

# **DFH EV Weight Exemptions Testimony LH.pdf**

Uploaded by: David Fraser-Hidalgo

Position: FAV

DAVID FRASER-HIDALGO  
*Legislative District 15*  
Montgomery County

Environment and Transportation Committee

*Chair*  
Motor Vehicle and Transportation  
Subcommittee



The Maryland House of Delegates  
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Annapolis, Maryland 21401  
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David.Fraser.Hidalgo@house.state.md.us

THE MARYLAND HOUSE OF DELEGATES  
ANNAPOLIS, MARYLAND 21401

Delegate Marc A. Korman  
Chairman, House Environment and Transportation Committee  
House Office Building – Room 251  
Annapolis, MD 21401

Mr. Chairman,

I am writing in favor of HB 652 – Vehicles Laws – Electric Vehicles – Weight Limits.

Electric vehicles weigh significantly more than gas-fueled vehicles, primarily because they are powered by a battery. The battery itself can weigh up to 16,000 pounds, accounting for nearly a quarter of the total weight of a truck.<sup>1</sup> To adhere to regulations, truckers often have to sacrifice cargo, reducing the quantity of goods transported per trip.

Currently, vehicles that utilize auxiliary power units or idle-reduction technology are permitted up to an additional 550 pounds total in gross, axle, tandem, and bridge formula weight limits. In Maryland, a semi-truck, including its cargo, can legally weigh a maximum of 80,000 pounds.<sup>2</sup> According to the American Trucking Associations, making trucks subject to strict weight restrictions decreases the payload of the truck while increasing traffic congestion. This can impede interstate commerce and deeply affect the ability to move critical goods at an efficient rate.<sup>3</sup>

To address concerns of transporting additional weight, it is important to recognize that electric trucks have a regenerative braking system. This system reverses electric motors that propel a vehicle, allowing the vehicle to decelerate as soon as the foot is lifted off the accelerator pedal. In turn, the vehicle is able to come to a smoother, quicker stop if necessary. Additionally, since the system captures the kinetic energy and transfers it into the vehicle's battery, it consumes less energy than friction braking.<sup>4</sup>

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<sup>1</sup> Bianca Giacobone, "Electrifying Trucking Will Mean Sacrificing Critical Weight for Heavy Batteries, Eating into Already-Slim Margins," Business Insider, n.d., <https://www.businessinsider.com/electric-trucks-longhaul-batteries-tesla-heavy-cargo-weight-problem-2023-2>.

<sup>2</sup> "2018 Maryland Code :: Transportation :: Title 24 - Vehicle Laws -- Size, Weight, and Load; Highway Preservation :: Subtitle 1 - Size, Weight, and Load :: § 24-109. Gross Weight of Vehicles," Justia Law, 2018, <https://law.justia.com/codes/maryland/2018/transportation/title-24/subtitle-1/section-24-109/>.

<sup>3</sup> "A Heavy Dose of Reality for Electric-Truck Mandates," American Trucking Associations, April 19, 2023, <https://www.trucking.org/news-insights/heavy-dose-reality-electric-truck-mandates#:~:text=Battery%20Electric%20trucks%2C%20which%20run,than%20their%20clean%20diesel%20counterparts.>

<sup>4</sup> "How Regenerative Brakes Work," Energy.gov, n.d., <https://www.energy.gov/energysaver/how-regenerative-brakes-work>.

Many states have enacted legislation to address the weight restrictions on electric trucks. In 2014, Virginia passed HB 341, which allowed any natural gas and/or electric vehicle to exceed the weight limits by up to 2,000 pounds.<sup>5</sup> Most recently, California adopted legislation in 2022 that authorized zero-emission vehicles to exceed weight limits on power units by up to 2,000 pounds.<sup>6</sup>

HB 652 allows plug-in electric drive vehicles and specific battery-operated vehicles to exceed gross, axle, tandem, and bridge weight limits by up to an additional 2,000 pounds total. This will ensure trucks do not have to sacrifice cargo weight on long haul routes, which often require larger batteries. Additionally, it will guarantee that the weight of the battery and electric devices are not subtracted from the cargo limits.

In order to achieve the state's carbon emissions goals, the pathway must be logical and technically achievable. As the state continues to transition to electric vehicles, regulations must be reflective of the changes in transportation. By providing an extension for electric truck weight requirements, Maryland would effectively address economic concerns while reducing our carbon footprint.

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<sup>5</sup> Title 46.2. Motor Vehicles,” § 46.2-1129.2. Further extension of weight limits for vehicles fueled by natural gas or powered by means of electric battery power, 2014, <https://law.lis.virginia.gov/vacode/title46.2/chapter10/section46.2-1129.2/>.

<sup>6</sup> “2022 California Code :: Vehicle Code - VEH :: Division 15 - Size, Weight, and Load :: Chapter 5 - Weight :: Article 1 - Axle Limits :: Section 35551.,” Justia Law, 2022, <https://law.justia.com/codes/california/2022/code-veh/division-15/chapter-5/article-1/section-35551/>.

# **HB652 - Maryland Motor Truck Association - Support**

Uploaded by: Louis Campion

Position: FAV



# Maryland Motor Truck Association

9256 Bendix Road, Suite 203, Columbia, MD 21045  
Phone: 410-644-4600 Fax: 410-644-2537



**HEARING DATE:** February 15, 2024

**BILL NO/TITLE:** House Bill 652 – Vehicle Laws - Electric Vehicles - Weight Limits

**COMMITTEE:** House Environment & Transportation

**POSITION:** Support

Maryland Motor Truck Association offers its support for HB652, which would provide a 2,000 lbs. weight allowance for electric trucks similar to that allowed in federal law to help offset the lost carrying capacity created by the vehicle's additional weight.

Electric trucks weigh more than comparable diesel trucks due to the increased weight of their batteries. Consequently, electric trucks must reduce cargo loads to remain within legal weight limits (e.g., 80,000 lbs. for a five-axle tractor trailer). Reducing load capacity results in more trucks needed to deliver the same amount of freight. According to a December 2022 study by the American Transportation Research Institute, the lost carrying capacity for an electric five-axle tractor trailer is 13,800 lbs. This equates to one additional truck needed for every four deliveries, or roughly a 25% increase in truck traffic to carry the same amount of freight being delivered today.

In the Consolidated Appropriations Act of 2019, Congress recognized this challenge and increased the federal gross, axle, tandem, and bridge weight limits for electric (and natural gas) vehicles on the Interstate Highway System by 2,000 pounds; however, this does not apply to state roads. HB652 would address this inconsistency.

It should be noted that the passage of HB652 would not prevent the state from posting a maximum weight limit on a specific roadway or bridge based on safety and engineering designs. Trucks would still be required to operate within those posted weight limits regardless of this legislation.

For the reasons noted above, MMTA asks for a favorable report on HB652.

**About Maryland Motor Truck Association:** Maryland Motor Truck Association is a non-profit trade association that has represented the trucking industry since 1935. In service to its 1,000 members, MMTA is committed to support, advocate and educate for a safe, efficient and profitable trucking industry in Maryland.

**For further information, contact:** Louis Campion, (c) 443-623-5663

# **HB652.pdf**

Uploaded by: Richard Tabuteau

Position: FAV

# V O L V O

TO: The Honorable Marc Korman, Chair  
Members, House Environment & Transportation Committee  
Delegate David Fraser-Hidalgo

FROM: Richard A. Tabuteau

DATE: February 15, 2024

RE: **FAVORABLE** – House Bill 652 – *Vehicle Laws - Electric Vehicles - Weight Limits*

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In Maryland, Volvo Group North America's Hagerstown Powertrain Production facility employs nearly 2,000 people including over 1,400 members of the UAW Locals 171 and 1247 and is the last major automotive manufacturer in the state. The plant develops, manufactures, and tests heavy-duty powertrains, transmissions and axles for its Mack and Volvo trucks as well as Prevost and Volvo buses at its 280-acre campus. Volvo Group also employs more than 60 people at one of its U.S. parts distribution facilities in Elkridge.

Volvo and Mack Trucks are the North American industry leaders in Zero-Emission (ZE) Class 8 truck sales. In 2020, the Volvo Group made a global commitment to having 100% of its product sales being fossil free by 2040, including a nearer term goal of 35% of product sales being zero-emission by 2030. The Hagerstown plant plays a key role in this transition through the manufacturing of all modular power boxes for the Volvo VNR electric and Mack LR electric Class 8 trucks. Mack Trucks also sells an electric refuse truck.

House Bill 652 allows plug-in electric drive vehicles and certain other electric vehicles to exceed gross, axle, tandem, and bridge weight limits by up to an additional 2,000 pounds total. The main goal of a truck is to carry freight or what in the industry we call payload. Unfortunately, battery electric trucks lose payload or freight carrying capabilities as batteries consume more of their weight allowance.

The U.S. Congress recognized that alternative fueled trucks deserve payload parity with their diesel counterparts. Initially, an allowance was provided for natural gas vehicles to be increased by 2,000 pounds to ensure this clean fuel did not lose freight carrying capabilities to its diesel counterparts. In 2019, Congress provided this payload parity to the battery electric trucks, which must carry heavy batteries to maintain range. However, the federal Congress only has the authority to provide this payload parity for interstates. Maryland must provide payload parity for intrastate roadways. Many of Maryland's neighbors, such as Pennsylvania, have already provided this payload parity to battery electric trucks operating on intrastate roadways. Intrastates are frequently located in environmental justice areas where deployments of ZEVs are high priority to

address longstanding air quality issues. This legislation will not only provide a level playing field for intrastate vehicle movement but also help address environmental justice.

Volvo Group urges the House Environment & Transportation Committee to give House Bill 652 a favorable report.

**For more information call:**

Richard A. Tabuteau

347.886.2904



**HB652\_MTBMA\_UNFAV.pdf**

Uploaded by: Michael Sakata

Position: UNF



February 15, 2024

Delegate Marc Korman, Chair  
House Environment and Transportation Committee  
Room 251, House Office Building  
Annapolis, MD 21401

**RE: HB 652 – UNFAVORABLE – Vehicle Laws – Electric Vehicles – Weight Limit**

Dear Chair Korman and Members of the Committee:

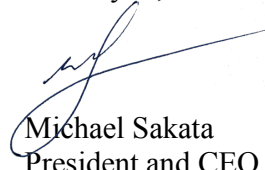
The Maryland Transportation Builders and Materials Association (“MTBMA”) has been and continues to serve as the voice for Maryland’s construction transportation industry since 1932. Our association is comprised of 200 members. MTBMA encourages, develops, and protects the prestige of Maryland's transportation construction and materials industry by establishing and maintaining respected relationships with federal, state, and local public officials. We proactively work with regulatory agencies and governing bodies to represent the interests of the transportation industry and advocate for adequate state and federal funding for Maryland’s multimodal transportation system.

House Bill 652 proposes amendments to Maryland’s transportation laws to accommodate electric vehicles by allowing them to exceed specific weight limits. The bill introduces formulas for calculating weight limits based on axle distances and provides additional allowances for vehicles equipped with fuel-saving technology, permitting plug-in vehicles to exceed weight limits by up to 2,000 pounds.

MTBMA opposes this legislation because it sets a precedent of giving preferential treatment to EVs over gas-production vehicles. While MTBMA recognizes the importance of promoting sustainable transportation options, this bill poses significant risks to our roads, leading to increased maintenance costs and potentially compromising road safety. Due to their heavier weight, the impact EVs have on our roads and infrastructure is irrefutable. The weight limit exceptions outlined in HB 652 will exacerbate Maryland’s roadway issues without fair contributions by EV users.

We appreciate you taking the time to consider our request for an **UNFAVORABLE** report on House Bill 652.

Thank you,

A handwritten signature in blue ink, appearing to read 'Michael Sakata', is written over a thin blue line that extends to the right.

Michael Sakata  
President and CEO  
Maryland Transportation Builders and Materials Association

**HB652\_MAA\_UNFAV.pdf**

Uploaded by: Rachel Clark

Position: UNF

CHAIRMAN:  
Jeff Graf  
VICE CHAIRMAN  
David Slaughter

**MARYLAND ASPHALT ASSOCIATION**



TREASURER:  
Paul Bramble  
SECRETARY:  
Curtis Hall  
PRESIDENT:  
Tim Smith

February 15, 2024

Delegate Marc Korman, Chair  
House Environment and Transportation Committee  
Room 251, House Office Building  
Annapolis, MD 21401

**RE: HB 652 – UNFAVORABLE – Vehicle Laws – Electric Vehicles – Weight Limit**

Dear Chair Korman and Members of the Committee:

The Maryland Asphalt Association (MAA) is comprised of 19 producer members representing more than 48 production facilities, 25 contractor members, 25 consulting engineer firms and 41 other associate members. MAA works proactively with regulatory agencies to represent the interests of the asphalt industry both in the writing and interpretation of state and federal regulations that may affect our members. We also advocate for adequate state and federal funding for Maryland's multimodal transportation system.

House Bill 652 proposes amendments to Maryland's transportation laws to accommodate electric vehicles (EVs) by allowing them to exceed specific weight limits. The bill introduces formulas for calculating weight limits based on axle distances and provides additional allowances for vehicles equipped with fuel-saving technology, permitting plug-in vehicles to exceed weight limits by up to 2,000 pounds.

MAA opposes this legislation because it sets a precedent of giving preferential treatment to EVs over gas-production vehicles. While MAA recognizes the importance of promoting sustainable transportation options, this bill poses significant risks to our roads, leading to increased maintenance costs and potentially compromising road safety. Due to their heavier weight, the impact EVs have on our roads and infrastructure is irrefutable. The weight limit exceptions outlined in HB 652 will exacerbate Maryland's roadway issues without fair contributions by EV users.

We appreciate you taking the time to consider our request for an **UNFAVORABLE** report on House Bill 652.

Sincerely,

A handwritten signature in black ink that reads "Tim Smith". The signature is written in a cursive, flowing style.

Tim E. Smith, P.E.  
President  
Maryland Asphalt Association

# **HB0652 - SHA - Vehicle Laws - Electric Vehicles -**

Uploaded by: Patricia Westervelt

Position: INFO

February 15, 2024

The Honorable Marc Korman  
Chair, House Environment and Transportation Committee  
251 House Office Building  
Annapolis MD 21401

**RE: Letter of Information – House Bill 652 – Vehicle Laws – Electric Vehicles – Weight Limits**

Dear Chair Korman and Committee Members:

The Maryland Department of Transportation (MDOT) offers the following information on House Bill 652 for the Committee’s consideration.

House Bill 652 allows any plug-in electric drive vehicle or other vehicle propelled to a significant extent by battery power to exceed gross, axle, tandem, and bridge weight limits by 2,000 pounds.

The federal government’s Fixing America’s Surface Transportation Act (FAST Act) of 2015, as amended, authorizes vehicles operated by an engine that is fueled primarily by natural gas (including liquid natural gas, liquid petroleum gas, and compressed natural gas) or powered primarily by electric batteries to exceed the interstate weight limits on the power unit by up to 2,000 pounds (up to a maximum gross vehicle weight of 82,000 pounds).<sup>1</sup> A vehicle may exceed the limits on the power unit for the single axle, tandem axle, and federal bridge formula maximum weights, subject to the 2,000-pound allowance cap and gross vehicle weight maximum. As such, the FAST Act allows states to create an additional allowance for alternatively fueled vehicles. Maryland has provided an allowance for alternatively fueled vehicles that is consistent with the FAST Act and that exceeds the requirements of HB 652 since January 24, 2020, as part of the State’s official enforcement policy. The State Highway Administration’s (SHA) Motor Carrier Division recently updated its Commercial Vehicle Operations web page<sup>2</sup> to inform the public and operators of alternatively fueled vehicles of this enforcement policy.

SHA notes that the landscape for alternatively fueled vehicles is rapidly changing, and it is expected that vehicle weights for alternatively fueled vehicles will decrease over time as technology improves. As such, the amount and existence of allowances authorized by the federal government over the interstate weight limits could continue to change. SHA will continue to ensure compliance with these federally established standards and take action to avoid sanctions for noncompliance.<sup>3</sup>

The Maryland Department of Transportation respectfully requests the Committee consider this information during its deliberations of House Bill 652.

Sincerely,

Matthew Mickler  
Deputy Director (Acting), Office of Policy and Research  
Maryland State Highway Administration  
410-545-5629

Pilar Helm  
Director of Government Affairs  
Maryland Department of Transportation  
410-865-1090

<sup>1</sup> See 23 U.S.C. § 127(s).

<sup>2</sup> <https://www.roads.maryland.gov/mdotsha/pages/cvo.aspx?did=ahps&PageId=23>

<sup>3</sup> See 23 U.S.C. § 127(a).