



February 15, 2022

## **SB 528 Climate Solutions Now Act of 2022**

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### **Position: Support**

Clean Air Task Force (CATF) supports SB 528, which requires net-zero statewide greenhouse gas emissions by 2045.

California, Hawaii, Louisiana, Massachusetts, Michigan, Nevada, New York, Virginia, and Washington have all made legally binding net-zero or carbon neutrality targets for no later than mid-century. In addition, a diverse group of states across the United States (U.S.), representing 27% of U.S. electricity consumption, have adopted clean energy standards for the electric sector with commitments to be fully decarbonized by no later than mid-century. In 2021 alone, Illinois, North Carolina, and Oregon, representing 7% of U.S. electricity consumption, enacted clean energy legislation.

CATF notes that in implementing a net-zero target, most recent studies demonstrate that employing an “all-of-the-above” suite of clean energy technologies will likely be necessary to achieve deep decarbonization at least cost.<sup>1</sup>

Along with our support, we are providing some additional comments for your consideration.

- CATF recommends including a representative of the fossil fuel industry within the Just Transition Employment and Retraining Working Group who has been dislocated by the downsizing of the fossil fuel industries.
- Oregon adopted new landfill methane emissions regulations in 2021.<sup>2</sup> CATF recommends considering Oregon’s new Landfill Methane Regulations as a basis for the minimum stringency of the SB 528 methane standard, instead of California’s Landfill Methane Regulations, which were adopted in 2010.

The following comments are directed to the Maryland Department of the Environment (Department) during the development of its proposed plan to reduce statewide greenhouse gas emissions, which will be submitted to the Governor and General Assembly on or before June 30, 2023. CATF is open and willing to provide further expertise to assist the Department with its planning.

- CATF recommends that the Department’s plan propose reducing each separate greenhouse gas within its own reduction pathway (e.g., methane, CO<sub>2</sub>, etc.).<sup>3</sup>
- In the case of methane reduction, CATF recommends a target of 60% by 2030.

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<sup>1</sup> [https://www.vibrantcleanenergy.com/wp-content/uploads/2021/10/US-Econ-Decarb\\_CCSA.pdf](https://www.vibrantcleanenergy.com/wp-content/uploads/2021/10/US-Econ-Decarb_CCSA.pdf)  
See also: Net Zero America Project Report ([https://netzeroamerica.princeton.edu/img/Princeton\\_NZA\\_Interim\\_Report\\_15\\_Dec\\_2020\\_FINAL.pdf](https://netzeroamerica.princeton.edu/img/Princeton_NZA_Interim_Report_15_Dec_2020_FINAL.pdf)) and Decarb America “Pathways to Net-Zero Emissions” (<https://decarbamerica.org/report/pathways-to-net-zero-emissions/>)

<sup>2</sup> <https://www.wastedive.com/news/oregon-landfill-methane-emissions-rule-strictest/608652/>

<sup>3</sup> <https://cdn.catf.us/wp-content/uploads/2020/09/21092651/AQCC-GWP-methane-June-16-2020-Final.pdf>

- CATF recommends that the proposed reductions not permit that overcompliance for one requirement offset noncompliance with the other. This approach is based on the risk that using a higher global warming potential for methane, relative to other greenhouse gases, such as CO<sub>2</sub>, can slow down mitigation of different greenhouse gases if multiple greenhouse gases are lumped together under a single policy.
- CATF recommends that the Department's plan improve upon prior regulations that control methane leakage. The reduction of methane leakage, and therefore overall methane emissions, will assist with the state's plan to reach net-zero statewide greenhouse gas emissions by 2045.

CATF also notes that the inclusion of other clean firm power generation sources, in addition to geothermal (e.g., advanced nuclear),<sup>4, 5</sup> in SB 528's allowable "low-carbon renewable energy source[s]" would incentivize the deployment of these zero-carbon resources within Maryland.

Finally, CATF notes and supports the inclusion of carbon capture and storage (CCS) technology as a greenhouse gas emission reduction measure within SB 528. The inclusion of CCS supports the ability to reduce greenhouse gas emissions from hard-to-abate industries (e.g., cement), the expansion of clean firm power for the maintenance of grid stability and is a key piece of a low-cost fully decarbonized electric system.

We urge the Committee to issue a favorable report on SB 528.

Please reach out to Angela Seligman (email: [aseligman@catf.us](mailto:aseligman@catf.us), cell: 314.922.5293) with any questions.

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*CATF is a global nonprofit organization working to safeguard against the worst impacts of climate change by catalyzing the rapid development and deployment of low-carbon energy and other climate-protecting technologies. With 25 years of internationally recognized expertise on climate policy and a fierce commitment to exploring all potential solutions, CATF is a pragmatic, non-ideological advocacy group with the bold ideas needed to address climate change. CATF has offices in Boston, Washington D.C., and Brussels, with staff working virtually around the world.*

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<sup>4</sup> [https://www.vibrantcleanenergy.com/wp-content/uploads/2021/10/US-Econ-Decarb\\_CCSA.pdf](https://www.vibrantcleanenergy.com/wp-content/uploads/2021/10/US-Econ-Decarb_CCSA.pdf)

<sup>5</sup> [https://www.catf.us/wp-content/uploads/2021/06/NorthBridge\\_Deep\\_Decarbonization\\_Literature\\_Review.pdf](https://www.catf.us/wp-content/uploads/2021/06/NorthBridge_Deep_Decarbonization_Literature_Review.pdf)