



**Maryland PIRG**  
Maryland Public Interest Research Group

**Testimony HB829  
Zero-Emission Truck Act of 2022  
Environment & Transportation  
February 25th, 2022  
Emily Scarr, Maryland PIRG Director  
FAVORABLE**

*Maryland PIRG is a state based, small donor funded public interest advocacy organization with grassroots members across the state. For fifty years we've stood up to powerful interests whenever they threaten our health and safety, our financial security, or our right to fully participate in our democratic society.*

*Environment Maryland is a citizen-based environmental advocacy organization. We work to protect clean air, clean water, and open space.*

Throughout the state, Maryland children and families are suffering from the damaging effects of living with unhealthy air quality. In October, Maryland PIRG Foundation and Environment Maryland Research and Policy Center released "[Trouble in the Air](#)," which outlined elevated air pollution days throughout the state. The Baltimore area experienced 43 elevated air pollution days in 2020, and many metropolitan areas throughout Maryland faced similar levels of air pollution. Elevated air pollution increases the risk of premature death, asthma attacks, cancer and other adverse health impacts.

**In the [American Lung Association's 2021 State of the State Report](#), six Maryland counties received an "F" for air quality. [See chart on final page]**

Clearly, the Advanced Clean Truck rule (ACT) won't clean up all of our vehicles or even electrify all our trucks. But it will start to put us towards a path of mandating an increasingly higher number of electric trucks sold in the state starting in 2025, and ramping up for more than a decade.

Diesel fumes from medium and heavy duty trucks on the road is a true health hazard.

Diesel particulate matter contributes to numerous health impacts including increased hospital admissions, particularly for heart disease, but also for respiratory illnesses, and even premature death.

Diesel trucks, like all fossil fuel vehicles, are also a source of global warming pollution.

The Advanced Clean Truck rule would apply to everything as small as delivery trucks to as big as 18-wheelers. It sets a sales requirement that increases each year, starting in 2025, so that a certain percentage of all trucks sold each year must be electric and ratcheting up through 2035.

This rule requires that vehicle manufacturers sell an increasing annual percentage of medium and heavy duty vehicles including pickup, delivery, and semi trucks as well as school buses

between Model Year 2026 (for states that adopt in 2022) and 2035. **These vehicles represent 10% of vehicles on the road but disproportionately contribute to 30% of carbon emissions, 45% of toxic nitrogen oxide emissions, and 57% of health harming particulate matter emitted by the entire transportation sector in the US.**

The most common opposition to this bill by the vehicle industry is that the cost exceeds the benefits. This is false from multiple perspectives.

First, zero-emission trucks provide savings to fleets: many trucks are already cost competitive on a total cost of ownership basis; larger vehicles are expected to achieve parity by 2025, and heavy-duty long-haul vehicles are expected to achieve parity by 2030, even without incentives (ZEV owners are anticipated to save \$30,000 over the lifetime and especially after model year 2035).<sup>1</sup> This is largely due to fuel cost savings from charging with less expensive fuel and anticipated lower maintenance costs.

The upfront price of vehicles is also expected to continue to decline significantly as battery prices decline; adopting the ACT will only further that trend by increasing supply and improving economies of scale in a way that continues to depress prices. That being said, it is important to remember in the nearer term that looking only at these upfront expenses results in a myopic point of view - one that tells only a small part of the story and doesn't take into account public health impacts and related healthcare costs.

By passing this bill, Maryland would join a growing number of states adopting the Advanced Clean Truck Rule, including California, Massachusetts, New York, New Jersey, Washington, and Oregon. This legislation would also help Maryland follow through on its commitment for 30% of all medium and heavy duty vehicles sales to be electric by 2030 and could create high quality, environmentally friendly jobs in the process.

**We respectfully request a favorable report.**

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<sup>1</sup> North American Council for Freight Efficiency, *Electric Trucks: Where They Make Sense* (May 2019) at 13-14, <https://nacfe.org/emerging-technology/electric-trucks/>; ICF, Comparison of Medium- and Heavy-Duty Technologies in California – Executive Summary (Dec. 2019) at 4, [https://www.caletc.com/assets/files/ICF-Truck-Report\\_Final\\_December-2019.pdf](https://www.caletc.com/assets/files/ICF-Truck-Report_Final_December-2019.pdf).