
February 9, 2023

The Honorable Brian J. Feldman
Chair, Senate Education, Energy, and the Environment Committee
2 West, Miller Senate Office Building
Annapolis, MD 21401

RE: Letter of Information – Senate Bill 224 – Department of Environment – Zero Emission Medium and Heavy-Duty Vehicles – Regulations (Clean Trucks Act of 2023)

Dear Chair Feldman and Committee Members:

The Maryland Department of Transportation (MDOT) takes no position on Senate Bill 224 but offers the following information for the Committee’s consideration.

Senate Bill 224 requires the Maryland Department of Environment to adopt regulations that establish requirements for the sale of zero-emission medium and heavy-duty vehicles in the State of Maryland.

The MDOT State Highway Administration’s (SHA) Statewide fleet currently includes 1,515 medium and heavy-duty vehicles. These vehicles operate across the State, utilized by the seven SHA districts to perform various maintenance and emergency response services. This includes, but is not limited to, snow removal, litter clean up, and Coordinated Highways Action Response Team (CHART) emergency roadside response, which encompasses temporary traffic control, relocation of disabled vehicles, and general support for stranded motorists on roadways. The SHA is actively pursuing methods to lower the carbon footprint and support Maryland’s goals for reducing Statewide greenhouse gas emissions. The SHA is reviewing creative methods to fund equipment purchases through the Carbon Reduction Program in the Infrastructure Investment and Jobs Act (IIJA), which may allow for diesel engines to be retrofitted with diesel emission reduction technology.

Currently, there is insufficient electrical capacity to support an entirely zero-emission medium and heavy-duty fleet at SHA. Large scale charging stations will need to be installed at all SHA maintenance shop facilities. There are additional concerns about the capability of electric heavy-duty equipment and performance during long-lasting extreme weather events or other emergency on-call operations. Converting SHA’s medium and heavy-duty fleet to fully electric would require an increased number of vehicles or additional contractor resources to maintain the current level of service. This conversion would also require a form of training for current fleet mechanics or the creation of new mechanic positions that specialize in the repair and installation of parts required by a fully electric fleet.

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The SHA anticipates a significant fiscal impact from Senate Bill 224. The preliminary estimate indicates that it could cost approximately \$950 million to replace the existing fleet with electric medium and heavy-duty vehicles. This estimate does not include the cost of acquiring and installing adequate charging infrastructure across the State, the need to invest in additional vehicle units to meet the operational demand, or the cost of training and recruiting qualified mechanics to maintain the fleet. These additional requirements would increase the fiscal impact to well over \$1 billion.

The Maryland Department of Transportation respectfully requests the Committee consider this information when deliberating Senate Bill 224.

Respectfully submitted,

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