



February 9, 2022

Education, Energy, and the Environment Committee
Miller Senate Office Building, 2 West Wing
11 Bladen Street
Annapolis, MD 21401

Re: Support for SB 224, Clean Trucks Act of 2023

To the Education, Energy, and the Environment Committee,

Thank you for the opportunity to submit this letter in support of SB 224. Rivian Automotive, LLC (“Rivian”) strongly supports the Advanced Clean Trucks (“ACT”) regulations and encourages the state of Maryland to take the necessary steps to establish the rules. This could include legislative action by passage of SB 224 directing the Maryland Department of the Environment (“MDE”) to initiate a rulemaking in 2023.

Founded in 2009, Rivian is an independent U.S. company with more than 13,000 employees worldwide. It is Rivian’s mission to Keep the World Adventurous Forever. Our focus is the design, development, manufacture, and distribution of all-electric adventure vehicles, specifically the R1T pickup, R1S 7-passenger SUV, and a commercial van for Amazon. All our vehicle products meet the requirements of the ACT regulations and show the market’s readiness for sales requirements on manufacturers that achieve a full transition away from fossil fuel-powered medium- and heavy-duty (“MHD”) vehicles.

In the face of climate change, the transition from fossil fuels to electric transportation is critical to ensuring that forever is possible. Rivian strongly supports programs of ambitious emissions regulation and zero-emission vehicle (“ZEV”) sales requirements as core to our values and vision for the world. SB 224 would leverage the state’s authority under Section 177 of the federal Clean Air Act to direct MDE to adopt the ACT regulations pioneered by California. The rules would establish Maryland as a priority market for MHD ZEVs, thereby driving critical emissions reductions in the state’s transportation sector.

The ACT rules complement existing standards governing light-duty vehicles, also known as the Advanced Clean Cars program. Maryland has shown national leadership as an ACC state for more than a decade and Rivian looks forward to the state formally adopting the next phase of ACC standards for model years 2026 and beyond.

Setting ambitious, companion requirements for the MHD sector is a critical task. Conventional MHD vehicles contribute disproportionately to GHG emissions and air pollution. Nationwide, MHD vehicles comprise just 10 percent of vehicles on the road but they emit 20 percent of all transportation sector GHGs and more than 60 percent of tailpipe nitrogen oxides (NOx) and particulate matter (PM). In 2020, approximately 60 percent of those NOx and PM emissions occurred in urban areas. That’s why electrifying MHD vehicles can have particular benefits for frontline communities, which often neighbor ports, highways, and warehouse districts. According to the International Council for Clean Transportation (“ICCT”), adoption of the ACT rule in Maryland would avoid almost 70,000 tons of NOx, 613 tons of PM2.5,

and more than 7 million metric tons of GHG emissions by 2050.¹ These reductions would represent a crucial down payment on ever stronger public health improvements and the achievement of Maryland’s larger climate goals. With transportation contributing more to the state’s GHG emissions than any other economic sector, the state cannot afford to leave any emissions reductions from vehicles on the table.

Implementing the ACT rule will help catalyze growth in the MHD ZEV market and should be viewed as foundational for any state approach to eliminating emissions from the MHD sector. With its strong yet achievable standards, vehicle class-specific sales targets, and provisions for credit trading, the regulation is thoughtfully designed to support industry’s compliance efforts while driving accelerated deployment of EVs by manufacturers. This helps industry grow more quickly and cost-effectively to large-scale production—crucial for the long-term success of the industry as well as Maryland’s transportation electrification efforts.

Once again, Rivian applauds the goals of SB 224 and Maryland’s broader efforts to electrify transportation. To ensure this bill achieves its aims, we note that an amendment to the bill’s definitions of medium- and heavy-duty vehicles is required to conform with the California code, which the ensuing regulation would reference. Companion bill HB 230 includes the correct definitions that the Senate should reflect in its version of the legislation. We understand that this issue has been recognized and the necessary amendment will be made during the hearing. We urge this amendment and your support for this important bill to put Maryland on a path to being an ACT state by the end of 2023.

Sincerely,

Beau Whiteman
Public Policy Manager
Rivian Automotive, LLC
bwhiteman@rivian.com | 814-746-6615

¹ The International Council on Clean Transportation, *Benefits of Adopting California Medium- and Heavy-Duty Vehicle Regulations* (2022), available at www.theicct.org/benefits-ca-multi-state-reg-data/.