



March 02, 2023

The Honorable Kumar P. Barve, Chair
Environment and Transportation Committee
House Office Building, Room 251
Annapolis, Maryland 21401

Re: House Bill 966 – Motor Vehicles-Modified Exhaust Systems and Noise Abatement Devices-Testing and Penalties

Dear Chair Barve and Members of the Committee:

The Maryland Department of the Environment (MDE or the Department) has reviewed House Bill 966 and would like to provide the following information.

The vehicle emissions inspection program (VEIP) is jointly administered by MDE and the Maryland Department of Transportation Motor Vehicle Administration (MDOT MVA). Each agency has distinct areas of responsibility with respect to VEIP. MDOT MVA oversees the VEIP contractor and overall VEIP operations while MDE is responsible for the technical aspects of the program such as program design, establishment of test procedures, quality assurance and auditing activities, data analysis and air quality benefits modeling, and managing the State Implementation Plan (SIP).

VEIP is required by the federal Clean Air Act. The VEIP statute that is being modified by this proposed bill to include sound testing was solely enacted to provide Maryland with the specific authority needed to implement the VEIP in accordance with the Clean Air Act and the Environmental Protection Agency's implementing regulations. The VEIP statute is part of the SIP that is submitted to and approved by the EPA and, as part of the SIP, it is a federally enforceable program. Adding sound testing to the statute could complicate the connection between the VEIP statute and its federally mandated function.

Finally, the VEIP is not a statewide program. VEIP testing is only performed in 14 Maryland jurisdictions and many in the geographic area, such as those registered as historic vehicles, are exempted from VEIP testing. For these reasons, as well as the significant operations and cost impacts to the VEIP, MDE doesn't agree with including sound testing in VEIP.

Thank you for your consideration. We will continue to monitor House Bill 966 during the Committee's deliberations, and I am available to answer any questions you may have. Please feel free to contact me at 410-260-6301 or by e-mail at gabrielle.leach@maryland.gov.

Sincerely,

A handwritten signature in black ink that reads "Gabrielle Leach".

Gabrielle Leach

cc: The Honorable Tiffany Alston
Christopher R. Hoagland, Air and Radiation Administration