



P.O. Box 278
Riverdale, MD 20738

Committee: Environment and Transportation

Testimony on: SB224- Department of the Environment - Zero-Emission Medium- and Heavy-Duty Vehicles - Regulations (Clean Trucks Act of 2023)

Position: Favorable

Hearing Date: March 29, 2023

The Maryland Chapter of the Sierra Club supports SB224, which would require the Maryland Department of the Environment to adopt the Advanced Clean Trucks (ACT) Rule by the end of this year. Adoption of the Advanced Clean Trucks rule is one of our priority issues this session. The rule would require vehicle manufacturers to sell an increasing annual percentage of zero-emission trucks and school buses in the state beginning in Model Year 2027 and concluding in 2035. The sales requirements of the Advanced Clean Trucks rule gradually ramp up at a rate that is technologically feasible.

Maryland Sierra Club has significant concerns about the amendment added to SB224 that would allow the Maryland Department of Environment to delay implementation of the Advanced Clean Trucks rule. This amendment undermines one of the core goals of the regulation, which is to create market certainty for the sale and timeline of zero-emission trucks and buses. Authorizing MDE to delay the implementation of the regulation is unnecessary. There is a wide degree of flexibility for manufacturers to meet the sales targets. The Advanced Clean Trucks rule allows credit trading across manufacturers and most vehicle classes. The regulation also allows the Maryland Department of Environment to establish enforcement and set penalties for non-compliance that is unique to our state. Delaying implementation would delay the climate and public health benefits of the regulation.

Transportation is the largest source of climate-damaging greenhouse gas emissions and a leading source of toxic air pollution that is hazardous to human health. According to data from a report by the International Council on Clean Transportation, if Maryland adopts the ACT, the state would avoid more than 116,000 cases of respiratory illnesses like asthma cumulatively through 2050. Residential neighborhoods located near major roads and highways face disproportionate burdens from traffic and transportation pollution. These neighborhoods are far more often communities of color due to decades of residential segregation and bear a burden of higher rates of asthma and other health conditions.

Section 177 of the Clean Air Act allows states to adopt vehicle emissions standards that are identical to those adopted by the state of California. In 2020, in the absence of federal regulations, California set the first-in-the-nation standards for the sale of zero-emission medium and heavy-duty trucks through adoption of the ACT Rule. Since then, New York, New Jersey, Massachusetts, Oregon, Vermont, and Washington have adopted the same ACT Rule, and a number of other states are considering doing so, too. In 2023, the Maryland Commission on Climate Change included a recommendation in its annual report that the state adopt the ACT Rule.

Companies across the nation are increasingly demanding electric trucks and vans to help them

Founded in 1892, the Sierra Club is America's oldest and largest grassroots environmental organization. The Maryland Chapter has over 70,000 members and supporters, and the Sierra Club nationwide has over 800,000 members and nearly four million supporters.

meet their climate and pollution goals, and to save on the costs of fuel and maintenance. More than 70 major corporations, including IKEA and Nestle that have large truck fleets, signed a letter urging state governors to accelerate the growth of electric trucks by adopting the ACT Rule. Electric trucks are increasingly available. There are over 100 models from more than 30 manufacturers that are currently on the market or will be before 2024. Maryland and other states can take advantage of an estimated \$2.8 billion of federal funding from the Inflation Reduction Act to purchase zero-emission medium-and heavy-duty vehicles and charging infrastructure.

By requiring the electrification of school buses and large pickup trucks, drayage, delivery, and semi-trailer trucks sold in Maryland, the ACT Rule would be a crucial step in the effort to combat climate change and reduce the toxic air pollution that makes us sick. We urge a favorable report on this bill.

Lindsey Mendelson
Transportation Representative
Lindsey.mendelson@MDSierra.org

Josh Tulkin
Chapter Director
Josh.tulkin@MDSierra.org