



February 9, 2023

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

RE: SB 224 – FAVORABLE WITH AMENDMENTS – Department of the Environment – Zero-Emission Medium- and Heavy-Duty Vehicles – Regulations (Clean Trucks Act of 2023)

Dear Chair Feldman and Members of the Committee:

The Maryland Transportation Builders and Materials Association (MTBMA) has been and continues to serve as the voice for Maryland's construction transportation industry since 1932. Our association is comprised of 200 members. MTBMA encourages, develops, and protects the prestige of the transportation construction and materials industry in Maryland by establishing and maintaining respected relationships with federal, state, and local public officials. We proactively work with regulatory agencies and governing bodies to represent the interests of the transportation industry and advocate for adequate state and federal funding for Maryland's multimodal transportation system.

Senate Bill 224 requires the Maryland Department of the Environment to adopt regulations regarding the sale of new zero-emission medium- and heavy-duty vehicles in the state by December 1, 2023. These regulations must incorporate by reference the recently adopted California Air Resources Board's vehicle standards.

While MTBMA recognizes the impact of climate change, the regulatory directive proposed by Senate Bill 224 is shortsighted and too unwieldy to be accomplished in a six-month timeframe. If it is the will of the Committee to enact legislation to address this issue, we respectfully ask that the Committee incorporate the amendments proffered by the Maryland Motor Truck Association. These amendments address several critical shortcomings of the bill as proposed. For example, they would specify which California regulations must be incorporated by reference and give the industry four years to phase them in. In addition, they would create a second reporting deadline of December 1, 2024 for the submission of a detailed implementation plan aimed at preparing our infrastructure for the forthcoming changes, such as assessing the additional impact on the state's electric grid, increasing geographic coverage of public recharging stations, and outlining the level of purchase incentives that will be required to meet the goals of implementation.

MTBMA would add that the implementation plan should also make recommendations on the purchase and zoning of storage and disposal facilities adequate to process the inevitable influx of spent batteries, fuel cells, and other critical components brought on by the shift to zero-emission vehicles; moreover,

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MTBMA believes that the Administration should be required to conduct a complete environmental impact study of those facilities, including a period for public review and comment, prior to the effective date of the regulations.

We appreciate you taking the time to address our request on Senate Bill 224.

Thank you,

A handwritten signature in blue ink, appearing to read "Michael Sakata", written over a faint, circular embossed seal or watermark.

Michael Sakata

President and CEO

Maryland Transportation Builders and Materials Association