



March 20, 2026

Senate Education, Energy, and the Environment Committee
2 West Miller Senate Office Building
Annapolis, Maryland 21401

RE: Oppose unless Amended for HB 451: Maryland Zero Emission Electric Vehicle Infrastructure Council - Membership, Duties, and Sunset Repeal

Dear distinguished Chair Senator Brian Feldman, distinguished Vice Chair Senator Cheryl Kagan, and distinguished Senate Education, Energy, and the Environment Committee,

We appreciate the opportunity to share our thoughts on HB 451. The United States Hydrogen Alliance (USHA) is a non-profit association of members advocating for the development, deployment and utilization of clean hydrogen in all 50 states. We serve the hydrogen industry through state and federal policy advocacy, market development, and community building. Our mission is to leverage the unique attributes of hydrogen to reduce emissions across traditional sectors, increase energy resiliency and diversity, enhance local economies and workforces, and protect the nation domestically and abroad.

USHA respectfully submits this letter in opposition unless amended to HB 451. USHA appreciates the General Assembly's continued commitment to advancing zero emission transportation infrastructure and recognizes the value of extending the Maryland Zero Emission Electric Vehicle Infrastructure Council. The Council has played an important role in coordinating statewide planning, identifying infrastructure needs, and convening stakeholders to accelerate the deployment of zero emission transportation solutions across Maryland.

However, as currently drafted, the bill removes references to fuel cell electric vehicles from key provisions, including the definition of zero emission vehicles and the Council's membership structure. While the legislation continues to include hydrogen refueling infrastructure within the Council's duties, it no longer recognizes fuel cell electric vehicles as part of the zero emission vehicle framework.

Fuel cell electric vehicles are a fully zero emission technology that produce only water vapor at the tailpipe and play a particularly important role in heavy-duty transportation, fleet operations, and other



applications where rapid refueling, longer range, and higher power density are required. Removing these vehicles from the statutory definition creates a disconnect between the infrastructure the Council is directed to consider and the vehicles that utilize that infrastructure.

Additionally, the bill removes two designated representatives for manufacturers of fuel cell electric vehicles and related infrastructure equipment. This change would reduce the diversity of technical expertise and stakeholder perspectives available to the Council. The original structure appropriately recognized that achieving statewide zero emission transportation goals requires evaluating multiple technologies and infrastructure solutions.

This narrowing is inconsistent with widely recognized medium- and heavy-duty vehicle decarbonization pathways that explicitly include both charging and hydrogen refueling, and that emphasize the need for coordinated deployment across freight corridors and high-utilization hubs, including explicit recognition that infrastructure planning must address both grid needs and hydrogen fueling.

USHA therefore urges the General Assembly to amend HB 451 to retain fuel cell electric vehicles within the definition of zero emission vehicles and to restore the two representatives from the fuel cell electric vehicle industry and related infrastructure within the Council's membership. We respectfully request the following revisions:

1. Restore fuel cell electric vehicles to the Council "zero emission electric vehicle" definition in Transportation Article §2-113.
2. Restore the existing Council membership seats, one representing fuel cell electric vehicle manufacturers and one representing hydrogen refueling/hydrogen infrastructure equipment expertise.
3. Restore the Council's authority to consider hydrogen refueling infrastructure alongside charging infrastructure so barrier removal efforts remain aligned with real-world transit and medium- and heavy-duty vehicle deployment needs.

Maintaining a technology-inclusive approach will ensure that Maryland's transportation planning remains coordinated, forward-looking, and aligned with the full range of zero emission technologies available to consumers and fleet operators particularly for transit and medium- and heavy-duty applications.



For these reasons, USHA respectfully requests that HB 451 be amended to preserve the Council's inclusion of fuel cell electric vehicle technologies. With these amendments, the legislation could continue to support Maryland's zero emission transportation goals while ensuring a cohesive and comprehensive long-term strategy.

We at the United States Hydrogen Alliance thank you for your time and consideration. Please reach out to us if you have any questions.

Respectfully,

R. Bekemohammadi

Roxana Bekemohammadi
Founder and Executive Director
United States Hydrogen Alliance