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March 10, 2026

The Honorable William C. Smith, Jr.  
Chair, Senate Judicial Proceedings  
2 East Miller Senate Office Building  
Annapolis, MD 21401

***RE: Letter of Concern – Senate Bill 912 – Vehicle Emissions Inspection Program -  
Exemption for Vehicles Formerly Registered as Historic***

Dear Chair Smith and Committee Members:

The Maryland Department of Transportation (MDOT) takes no position on Senate Bill 912 but offers the following concerns for the Committee's consideration.

SB 912 would exempt a vehicle which was formerly registered as Class L (Historic) prior to July 1, 2025, and was no longer eligible following the effective date of Chapter 604 of the Acts of the General Assembly of 2025 from having to participate in the Vehicle Emissions Inspection Program (VEIP). Owners would be required to self-certify their vehicle was previously registered as Class L and lost eligibility. However, SB 912 does not limit this exemption to the owner at the time the Class L vehicle lost eligibility and had to obtain alternative Class A, M, or E registration plates.

SB 912 would increase the administrative costs for operating the VEIP for the Motor Vehicle Administration (MVA). The creation of a unique subset of vehicles needing to be classified as eligible for an exemption throughout the life of the vehicle and regardless of owner would create potential points of conflict with customers trying to navigate the process as MVA staff work to accommodate these exemptions accurately. It also poses a conflict in fairness and equity in administering the VEIP as these vehicles should otherwise be subject to testing to ensure compliance with State clean air goals. The older the vehicle, the higher the likelihood its emissions systems are in need of repair to remain compliant in their use.

The Maryland VEIP is jointly administered by the MVA and the Maryland Department of the Environment (MDE), with significant support by a contractor that performs vehicle testing and operates and maintains the network of test stations and kiosks. The MVA provides operational oversight and contract monitoring and is responsible for ensuring the highest level of customer service and that the contractor upholds the same standards. The MDE provides technical oversight and ensures program quality.

The VEIP has helped dramatically improve Maryland's air quality since its implementation. The benefits of these improvements are demonstrated in reports issued by the MVA and do not negate the need for continued progress. Further, the VEIP is an important component of the State Implementation Plan required under the Federal Clean Air Act. Ensuring vehicles that are

regularly used on Maryland highways with a higher likelihood of required repairs needed for these important emissions systems is vital to ensure continued progress in improving air quality in the State.

The MVA understands the frustration of customers who have lost previous Class L registration eligibility for vehicles they do not in fact use on a daily basis. However, the MVA understands that some vehicles were potentially abusing the historic tag program by not adhering to the use limitations and continues to work with the General Assembly to provide technical feedback for equitable alternatives for all vehicle owners.

The Maryland Department of Transportation respectfully requests the Committee consider this information during its deliberation of Senate Bill 912.

Respectfully submitted,

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