

May 18, 2022

The Honorable Larry Hogan
Governor
100 State Circle
Annapolis, MD 21401

Dear Governor Hogan,

Maryland must swiftly adopt the Advanced Clean Trucks Rule and Heavy-Duty Omnibus Rule to tackle climate change and improve public health. As transportation, environmental, public health, climate, and economic justice advocates, we are writing to urge you to adopt both the Advanced Clean Trucks Rule and the Heavy-Duty Omnibus Rule.

First, we applaud you for signing onto the [Multi-State Medium- and Heavy-Duty Vehicle Memorandum of Understanding](#) (MOU) on July 13, 2020 and working on initiatives to increase the electrification of passenger vehicles in Maryland. Thanks to your support, we have made important steps in electrifying the light-duty vehicle sector. We must now take swift action to make sure we are also cutting pollution from the larger vehicles that continue to harm Marylander's health and contribute to the climate crisis.

Exhaust from **diesel trucks and buses is a leading source of harmful air pollution** that sends countless Maryland residents to the hospital every year. Though medium- and heavy-duty trucks and buses make up only [nine percent](#) of the state's 4.2 million registered vehicles, they [contribute a disproportionate](#) 39 percent of nitrogen oxide (NO_x) emissions in the state, 48 percent of fine particulate matter (PM_{2.5}), and 21 percent of global warming emissions from all on-road vehicles in the state. 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 unsafe pedestrian conditions, higher rates of asthma, and unremitting noise pollution. The harm to human health and the increasingly severe impacts to the climate demonstrate the magnitude of this problem and why it is so imperative to take steps now to address it.

To cut harmful air pollution and meet Maryland's new goal of reducing greenhouse gas emissions 60% from 2006 levels by 2031, Maryland must adopt the Advanced Clean Trucks Rule (ACT) and the Heavy-Duty Omnibus rule (low NO_x rule) as quickly as possible. In its recent draft *Multi-State Medium- and Heavy-Duty Zero-Emission Vehicle Action Plan*, the Northeast States for Coordinated Air Use Management (NESCAUM) recommended states adopt these policies to hit the targets laid out in the Medium and Heavy-Duty Vehicle MOU. **California, Massachusetts, New York, New Jersey, Oregon and Washington state have already adopted these standards**— and many more states, including Connecticut, are actively considering it. Regulatory action to implement the ACT and low NO_x rules is the key next step for states that joined the MOU.

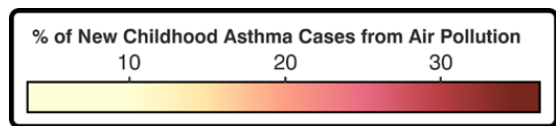
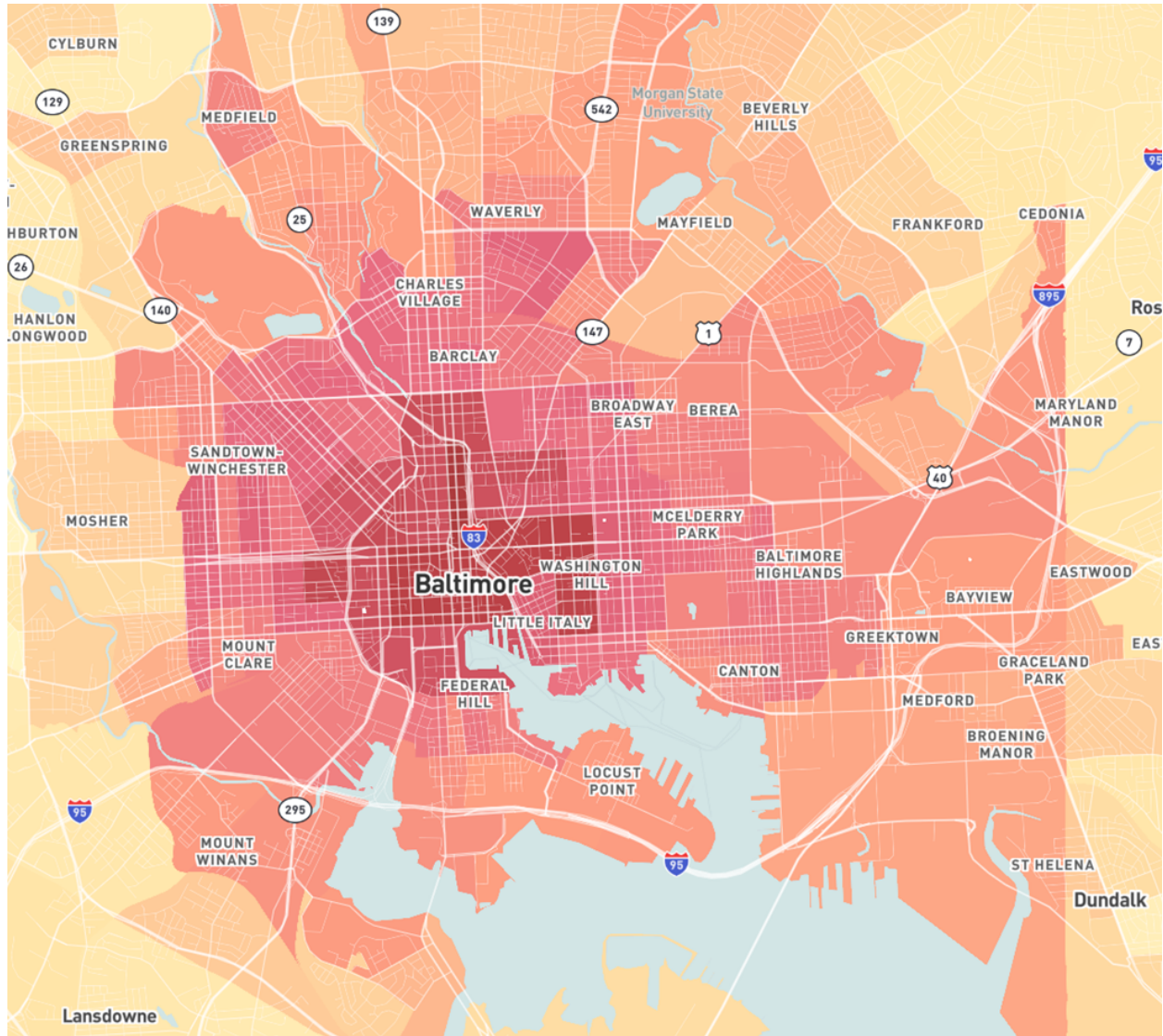
If adopted this year, the ACT would require all large vehicle manufacturers to sell an increasing annual percentage of zero-emission trucks and school buses in Maryland beginning in Model Year 2026. The sales targets in the ACT vary by truck size, increase at a pace that is gradual and technologically feasible, and are consistent with the goals laid out in the MOU. While the ACT rule works year-over-year to gradually increase the supply of zero-emission trucks and buses, diesel trucks and buses will continue to be sold in Maryland. The low NO_x rule would address this by limiting toxic air pollution from these diesel trucks and buses and require that new diesel trucks reduce their NO_x emissions 90% by 2027. This is necessary to ensure that diesel vehicles sold during the transition to zero-emission vehicles are as clean as possible. The ACT and low NO_x rules are two sides of the same coin: together, they collectively enable the state's long-term vision of a zero-emission truck and bus fleet and address toxic pollution in the near-term.

The technology is available to meet the requirements of the ACT and low NO_x rules. There are over [100 different models of zero-emission delivery vans and trucks from over 30 manufacturers](#) either in production already or will be within the next two years. On March 7, 2022, the U.S. Department of Energy (DOE) released a [study](#) showing that by 2030, nearly half of medium- and heavy-duty trucks will be cheaper to buy, operate, and maintain as zero emissions vehicles than traditional diesel-powered combustion engine vehicles. For some medium- and heavy-duty vehicles, the economics may be favorable even sooner. According to [a recent study done](#) by Roush Industries, some trucks and buses may be on par with diesel vehicles on an upfront cost basis as soon as 2027.

The benefits to Maryland's adoption of the ACT are enormous. Based on data from a recent International Council on Clean Transportation ([ICCT](#)) [report](#), the ACT would bring over **\$1.6 billion** in public health benefits to Maryland from 2020-2050, by avoiding over **230 hospital admissions** and emergency room visits, **270** premature deaths, and **116,200** cases of respiratory illnesses like asthma. Pediatric asthma attributable to nitrogen dioxide, of which transportation is a significant source, is demonstrated in visual detail in the map below. In the Baltimore metro region, nitrogen dioxide pollution contributes to more than 1,300 new childhood asthma cases every year; and, in some areas of the city, as many as 1 in 4 new childhood asthma cases are attributable to pollution.

Childhood Asthma Due to Air Pollution in Baltimore¹

¹ Map and estimates based on methodology described in SC Anenberg et al. 2022 (*Long-term trends in urban NO₂ concentrations and associated pediatric asthma incidence: Estimates from global datasets*. The Lancet Planetary Health Volume 6, E49-E58). Maps are presented at the census tract scale, using 2019 data from a global model analyzing nitrogen dioxide levels from satellite observations, government monitoring data, and publicly available information on land use, including roadways. Due to data limitations, not all local pollution hotspots may be reflected.



Adoption of ACT also presents a tremendous opportunity to create a significant amount of high-quality manufacturing and installation jobs in our state. Deferring consideration and implementation of ACT in Maryland risks ceding ground as a priority market for Zero-Emission Medium-and Heavy-Duty Vehicles. If Maryland doesn't adopt these rules, we would likely lose out on the clean energy economy emerging in other states and the associated benefits.

There is strong business support for the ACT and low NO_x rules. Large retailers operating in Maryland, such as Nestlé, IKEA Retail U.S., and Etsy, and energy solution companies like Siemens and Amply, [support the ACT rule](#). Electric vehicle manufacturers like Rivian and Tesla support the rule as well. The ACT rule would save truck drivers and fleets money while growing jobs. This is why some of the country's largest fleets, such as FedEx and IKEA Retail U.S., have

committed to buying only zero-emission trucks in the coming years. According to a January 2022 [Ceres study](#), members of the Corporate Electric Vehicle Alliance (which includes companies like Amazon, DHL, Hertz) are planning to acquire nearly 330,000 electric vehicles (class 1 to class 8) in the next 5 years. In addition to all-electric manufacturers, several of the largest legacy global truck makers including Daimler, Ford, and Volvo, have also made public commitments to sell only zero-emission trucks by 2040. These commitments from industry manufacturers demonstrate that the transition towards zero-emission trucks is feasible across all class segments and that the time is now for Maryland to join the ranks of leading states in adopting the ACT and low NO_x standards.

Please seize the opportunity to create good jobs, improve public health and protect future generations by adopting the ACT and low NO_x rules.

Sincerely,

ArchPlan Inc.
Central Maryland Transportation Alliance
Ceres
Chesapeake Climate Action Network and CCAN Action Fund
Clean Air Task Force
Climate Reality, Baltimore Area Chapter
Disability Rights Maryland
Elders Climate Action Maryland
Environment Maryland
Environmental Defense Fund
Indivisible Howard County Maryland
Labor Network for Sustainability (LNS)
Locust Point Community Garden
Maryland Conservation Council
Maryland League of Conservation Voters
Maryland Legislative Coalition
Maryland Sierra Club
Maryland PIRG
MLC Climate Justice Wing
Natural Resources Defense Council
Policy Foundation of Maryland
Rivian Automotive, LLC
Solutionary Rail
Strong Future Maryland
Transit Choices
Union of Concerned Scientists
Unitarian Universalist Legislative Ministry of Maryland
Voices Maryland

Cc:

Secretary Ben Grumbles, Maryland Department of the Environment

Deputy Secretary Horacio Tablada, Maryland Department of the Environment

Deputy Secretary Earl Lewis, Maryland Department of Transportation

Director George (Tad) S. Aburn, Jr., Maryland Department of the Environment