



Maryland Motor Truck Association

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HEARING DATE: February 25, 2022

BILL NO/TITLE: HB829: Department of the Environment – Zero-Emission Medium and Heavy Duty Vehicles – Regulations (Zero-Emission Truck Act of 2022)

COMMITTEE: House Environment & Transportation Committee

POSITION: Oppose

Maryland Motor Truck Association recognizes the continued need to lower greenhouse gas emissions from the transportation sector. **The trucking industry is fuel neutral**; however, we must have access to a readily available and affordable fuel supply that meets our operational needs so that we can deliver the food, clothing, medical supplies and other products that citizen's need. Electric trucks do not currently meet those criteria and are unlikely to do so in accordance with the timetable mandated in HB829.

The passage of HB829 will require that the state of Maryland mirror California's Advanced Clean Trucks rule. This mandates an increasing percentage of medium and heavy duty trucks sold in the state to be zero-emission vehicles beginning in 2024. Under the Clean Air Act, states are prohibited from setting their own emissions standards, with the exception of California. States must follow federal standards; however, if California deviates from the federal standards, other states may choose to adopt **identical standards**. Because there is no current federal standard governing zero emission trucks, Maryland would have no choice but to adopt California's standard. This means that Maryland would be automatically opted into future California standards, even if they do not represent the best interests of our state's citizens.

As noted above, electric vehicles are not yet a feasible alternative for most of the trucking industry – particularly in the heavy duty sector. Here are a few of the issues that have yet to be solved.

- Model availability – there are six major heavy duty truck manufacturers in the U.S. In a survey of those six, very few models are currently available for sale. Others are still being tested in pilot programs. Even among those that are offering vehicles, the lead time is in excess of one year to obtain the vehicle. While other manufacturers have garnered headlines about their electric trucks, actual production has yet to occur and is frequently delayed. For example, Tesla's electric semi-truck was announced in 2017, with a release date of 2019; however, none of these vehicles have yet been produced.
- Battery range and charge time – current battery ranges among the heavy duty manufacturers are projected between 150 to 250 miles. This is sufficient for local medium delivery trucks but falls well below the needs of most heavy duty regional or long-haul operations. Charge time is roughly two hours. A traditional diesel-powered tractor trailer can travel 2,000 miles on a single fill up and takes less than 15 minutes to fill up.
- Electric grid capacity – there are tremendous differences in power needed to charge a truck versus a car. This challenge cannot be overstated. Recently one trucking company with approximately 150 trucks in Joliet, IL attempted to outfit its terminal for electric vehicles. The company's application was denied by the city because the power required was greater than the rest of the city's daily use.
- Cost – by all accounts, the cost for a new electric truck is two to three times higher than the cost of a traditionally powered vehicle. This does not include charging equipment or grid infrastructure, which can be hundreds of thousands of dollars. California has attempted to overcome this by offering massive financial incentives in the billions of dollars to assist with this conversion. A single heavy duty electric tractor is eligible for a rebate of \$120,000.
- Reliability – a January 2022 report by CALSTART that was commissioned by the California Air Resources Board found that, "over 60% of the zero emission trucks that have been deployed in the United States are believed to be currently non-operational."
- Infrastructure – there are approximately 1,200 stations in Maryland for electric vehicle charging. MMTA is not aware of a single site that provides charging for trucks. The lead time for buildout of a private charging facility is 12 to 18 months.

- Additional trucks will be needed to deliver the same amount of freight – there is a 6,000 lbs. to 7,000 lbs. loss in payload with an electric truck because of the weight of the battery. This means that it will require one additional truck on the road for every six truck shipments to deliver the same amount of cargo.

Maryland is recognized primarily as a pass-through state for trucking. Most truck traffic on our roads originated in another state and is destined for a location out of Maryland. Without a federal solution, the impact of this legislation on greenhouse gas emissions reductions will be minimal as trucks traveling through Maryland will still be burning fossil fuels. Federal action to reduce GHGs from trucks is happening, but few people are aware of the tremendous activity that has occurred in recent years.

- Over the last 12 years, emissions from heavy duty diesel trucks and buses have been reduced by:
 - 99% for NOx
 - 98% for particulate matter
- It now takes 60 new trucks to equal the same emissions from one truck 30 years ago. The environmental impact was the equivalent of eliminating pollution from 13 million rigs.

Greenhouse gases have also been improved. The federal government implemented Phase 1 of its GHG reduction plan for trucks with model years 2014 – 2018. We are now in Phase 2, which runs until 2027.

- New commercial trucks being manufactured today reduce fuel consumption and GHGs by approximately 20% when compared to a truck manufactured just in 2010.
- Going forward, three additional rounds of increasingly stringent federal engine and vehicle GHG emissions standards are slated for new commercial trucks sold nationwide.
- Newly manufactured trailers will also be subject to increasingly stringent federal greenhouse gas emissions standards for the first time.
- By 2027, commercial trucks will further reduce fuel consumption and greenhouse gas emissions by an additional 25%. Improvements to trailers will provide an extra 9% reduction.

To that end, MMTA encourages a multi-faceted strategy that includes:

- A focus on infrastructure buildout backed by financial incentives for both trucks and charging stations. This is crucial to the large-scale adoption of ZEVs.
- An approach that considers all fuel options – including some continuation of fossil fuel use, such as clean diesel, natural gas, and biofuels as bridge fuels while other technologies are enhanced to meet the operational needs of the trucking industry. Both biodiesel and renewable diesel fuel are capable of significantly reducing greenhouse gas emissions without the major infrastructure investment that is required for other fuel sources.
- Bid preferences on state contracts for motor carriers that are partners in the Environmental Protection Agency’s SmartWay program and have taken steps to reduce their greenhouse gas emissions voluntarily.

Maryland is not California, which has the fifth largest economy in the world. We also do not have the pollution challenges it does. For example, in 2020, California had 157 days when it exceeded the federal ozone standard. Maryland had three such days. Getting to a ZEV truck future will be best achieved through a national program that will reduce greenhouse gases, rather than Maryland putting California in charge of our state’s trucking fuel and equipment policies. Yes, ZEV trucks are coming, but it does not make sense to adopt a policy that cannot be achieved in our state.

For the reasons noted above, MMTA asks for an unfavorable report on HB829.

About Maryland Motor Truck Association: Maryland Motor Truck Association is a not-for-profit trade association representing the trucking industry since 1935. In service to its 1,000+ members, MMTA is committed to supporting and advocating for a safe, efficient and profitable trucking industry across all sectors and industry types, regardless of size, domicile or type of operation.

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