



**Auto Consumer Alliance**  
13900 Laurel Lakes Avenue, Suite 100  
Laurel, MD 20707

---

**Testimony to the House Environment and Transportation Committee  
HB 28 -- Passenger, Truck, and Multipurpose Vehicles – Annual Registration Fees  
(Pedestrian Fatality Prevention Act of 2024)  
Position – Favorable**

The Honorable Mark Korman  
Environment and Transportation Committee  
Room 251, House Office Building  
Annapolis, MD 21401  
cc: Members, Environment and Transportation Committee

Feb. 1, 2024

**Honorable Chair Korman and Members of the Committee:**

I'm a consumer advocate and Executive Director of Consumer Auto, a non-profit group that works to foster safety, transparency, and fair treatment for Maryland drivers and car buyers.

We support **HB 28** because raising the registration fees for very heavy cars and small trucks will create at least modest incentives to encourage people to move toward smaller, safer, more energy-efficient, less-polluting vehicles – or at least (if they don't) to raise some revenue to meet some of the many social costs that oversized vehicles cause.

As has been widely reported, America is in the midst of a road safety crisis, with close to 43,000 people dying on US roads in 2022<sup>1</sup> and pedestrian deaths spiking by a shocking 80% since 2009.<sup>2</sup> While traffic deaths seem to have dropped slightly in 2023 nationally, they were up sharply in Maryland and in the District of Columbia last year.<sup>3</sup>

The fact that the vehicles most people drive have gotten dramatically larger and heavier over the last two decades is a big part of the reason our streets have gotten more dangerous for everyone -- and dramatically more dangerous for pedestrians – in those decades. Larger vehicles are more dangerous to those outside them in a number of ways: they take longer to stop or decelerate; they produce much greater force in a crash (since force = mass x acceleration); they often have poor forward visibility and big blind spots directly in front of the car (where pedestrians often are).<sup>4</sup>

Research has also shown that the increasingly common light trucks and SUVs with a high front hood are dramatically more deadly in a crash than smaller vehicles – in part because their higher profiles and hoods strike pedestrians in higher and more deadly regions of the body when they collide. A 2023 study found that large vehicles with hood heights of 40 inches or higher are 45%

---

<sup>1</sup> <https://www.nhtsa.gov/press-releases/traffic-crash-death-estimates-2022>

<sup>2</sup> <https://www.theverge.com/2023/11/14/23960624/truck-suv-hood-height-pedestrian-death-report-iihs>

<sup>3</sup> <https://www.wusa9.com/article/news/local/maryland/600-deaths-maryland-roads-2023/65-b30b0933-a6e7-43ad-85fb-90314cf71e36>

<sup>4</sup> <https://slate.com/business/2023/12/cars-trucks-suv-sales-electric-safety-risk.html>



---

more likely to kill a pedestrian in a crash.<sup>5</sup> Any number of studies have reached similar conclusions.<sup>6</sup>

But that's just the beginning of the problems they cause. Heavy vehicles cause much more intensive particulate pollution as a result of the greater erosion of tires and road surfaces their weight causes. And scientists are increasingly emphasizing that particulate pollution is one of the main (and until recently under-recognized) environmental impacts caused by cars.<sup>7</sup>

Of course, heavier vehicles are also less fuel-efficient than lighter cars, which means they produce more pollution and greenhouse gas emission per mile driven than smaller cars. The trend toward oversize vehicles is the main reason that progress toward improved gas mileage for gas-powered cars largely stopped around 2015; many carmakers have even seen a decline in average fuel economy in recent years – a fact that ought to be a scandal as global warming looms as not just a threat but a dangerous day-to-day reality.<sup>8</sup>

And even where they're powered by electricity, oversize vehicles require a great deal of energy to move (which has to be generated somehow), create more intensive particle pollution from tire and road wear, and pose very serious dangers to pedestrians, cyclists and other vulnerable road users. In fact, because EVs are generally heavier than similar gas-powered cars and usually accelerate more quickly (which is dangerous in dense urban and suburban settings), many road safety advocates are concerned that heavy EVs may be even more dangerous to pedestrians than oversize gas vehicles.<sup>9</sup>

Oversize cars also quite simply eat up too much public space – for driving, parking, and other purposes. That's why Paris, for instance, is holding a referendum next week on a proposal to triple parking fees for heavy SUVs – to try to discourage SUVs in dense city neighborhoods and reclaim scarce public space for other users.<sup>10</sup>

Similar concerns have prompted many other cities to seek to combat car bloat in a variety of ways.<sup>11</sup> Indeed in 2022, the District of Columbia adopted a stronger version of the approach **HB 28** would mandate – adopting a more steeply graduated, weight-based schedule of car registration fees. In D.C., it now costs about 7X as much to register a 6,000-pound vehicle (\$500) as to register one that weighs 3,500 pounds (\$72)<sup>12</sup>

---

<sup>5</sup> <https://www.theverge.com/2023/11/14/23960624/truck-suv-hood-height-pedestrian-death-report-iihs>

<sup>6</sup> <https://www.planetizen.com/news/2024/01/127196-study-zeroes-dangers-taller-vehicles>

<sup>7</sup> <https://slate.com/technology/2023/11/car-tires-6ppd-pollution-epa.html>

<sup>8</sup> <https://www.washingtonpost.com/climate-environment/2024/01/08/fuel-efficiency-suvs-electric-vehicles/>

<sup>9</sup> <https://www.iihs.org/news/detail/as-heavy-evs-proliferate-their-weight-may-be-a-drag-on-safety>

<sup>10</sup> <https://www.reuters.com/world/europe/paris-aims-drive-out-large-suvs-by-increasing-parking-fees-2023-11-22/>

<sup>11</sup> <https://usa.streetsblog.org/2023/08/09/how-communities-can-fight-back-against-ever-larger-cars-and-trucks>

<sup>12</sup> <https://www.washingtonpost.com/transportation/2022/06/25/dc-higher-vehicle-registration-fees/>



**Auto Consumer Alliance**  
13900 Laurel Lakes Avenue, Suite 100  
Laurel, MD 20707

---

**HB 28** would accelerate fees quite a bit less sharply, establishing annual registration fees for passenger cars that are about 4X greater for very heavy cars (\$229.50) than for those under 3,500 pounds (\$50.50) and about 3X greater for very heavy vehicles in the case of Class E trucks.

Those higher fees for heavier cars would encourage some drivers to move to smaller vehicles that are safer not only for pedestrians but cyclists, wheelchair users and, yes, even other drivers – and also offer at least somewhat cleaner vehicle transportation in a time of growing environmental crisis. And if the added fees aren't enough to change the purchasing choices of many consumers, at least they'll generate some revenue the state could use to fashion improved and safer streetscapes, clean up pollution, fund more affordable transit options, and take other steps to make our streets safer and greener for all Marylanders.

**We support HB 28 and ask you to give it a FAVORABLE report.**

Sincerely,

Franz Schneiderman  
Consumer Auto