

September 26, 2022

The Honorable Larry Hogan
Governor of Maryland
100 State Circle
Annapolis, MD 21041

Governor Hogan:

The undersigned organizations in Maryland urge you to issue an emergency regulation to adopt the Advanced Clean Cars II regulation by the end of 2022.

The Clean Air Act allows states to adopt regulations California has promulgated under Section 177 for vehicle emissions standards that are stricter than the federal government. In 2007, Maryland adopted the Clean Cars program and is legally required to adopt and maintain California's clean car standards as they are updated.

On August 25, 2022 the California Air Resources Board [approved the Advanced Clean Cars II standard](#) which requires manufacturers to sell an increasing percentage of new zero-emission cars and light-duty trucks, with 100% of these sales being zero-emission vehicles in 2035. The regulation includes provisions that advance equity in the zero-emission vehicle transition and provides consumers certainty about the quality and durability of clean cars and trucks and their batteries. [Ford](#), [Toyota](#), [General Motors](#), [Honda](#), and [Stellantis](#), have made supportive statements in favor of the rule and [Washington, Oregon, Massachusetts, and New York](#) have already taken steps to follow California's regulation. Together, the Clean Cars states represent about 40% of new car sales.

Within the transportation sector, over 70% of climate pollution comes from passenger cars and trucks. This regulation is one of the most significant opportunities to address the number one source of climate change pollution in the state and will make us less reliant on expensive fossil fuels with volatile prices. **Maryland's adoption of the Advanced Clean Cars II rule would result in reducing light-duty CO₂ emissions 63% below 2021 levels in 2035¹.** The Maryland Department of Environment Mitigation Working Group [presentation](#) in May 2022 indicated that achieving our state's goal of 60% emissions reductions by 2031 could require 100% of light-duty vehicle sales by 2035. Climate change is eroding our shorelines and cliffs, bringing changing weather patterns to our crops, removing the snow from our mountains, and threatening the health and economic livelihoods of our populace. The strongest possible Advanced Clean Cars program is a critical tool for Maryland to slash these emissions.

More than 80% of Marylanders live in counties that do not meet federal EPA clean air standards for ozone. Communities of color and low-wealth communities bear an especially unfair burden

¹ Based on a Sierra Club analysis using EV-REDI, a transportation analysis tool developed by Synapse Energy Economics

of fuel costs and [harmful air pollution](#) due to decades of [systematic marginalization](#). The Advanced Clean Cars II rule is an important step to mitigating these impacts by accelerating the number of cars on our roads that don't emit tailpipe pollution and incentivizing placement of these vehicles in communities disproportionately impacted by vehicle pollution. In 2035, the Advanced Clean Cars II standard would reduce light-duty NO_x emissions by 75%, light duty PM_{2.5} emissions by 61%, and light duty SO₂ emissions by 62% below 2021 levels in Maryland².

The original Advanced Clean Car program ends in 2025. Without standards in place in 2026 and beyond, Maryland will lose out on critical policies to reduce transportation emissions and will have decreased access to electric vehicle inventory in a global market.

The latest [IPCC report](#) says we are running out of time to take bold action on the climate crisis that disproportionately impacts frontline communities. Please adopt the Advanced Clean Cars II regulation as soon as possible to start reaping the benefits of cleaner air and an economy that is less reliant on expensive fossil fuels that fuel the climate crisis.

Sincerely,

Audubon Mid-Atlantic
Audubon Naturalist Society
Beaverdam Creek Watershed Watch Group
Central Maryland Transportation Alliance
Chesapeake Climate Action Network
Environmental Justice Ministry Cedar Lane Unitarian Universalist Church
Glen Echo Heights Mobilization
Greenbelt Climate Action Network
Green Team at St. Vincent de Paul Church
HoCo Climate Action
Indivisible Howard County
Labor Network for Sustainability
Locust Point Community Garden
Maryland Conservation Council
Maryland League of Conservation Voters
Maryland Legislative Coalition
Maryland Sierra Club
MaryPIRG Student Climate Action Coalition
MLC Climate Justice Wing
The Climate Mobilization Montgomery County
Transit Choices
Union of Concerned Scientists
Unitarian Universalist Legislative Ministry of Maryland
Washington Area Bicyclist Association

² Based on a Sierra Club analysis using EV-REDI, a transportation analysis tool developed by Synapse Energy Economics