



October 15, 2023

Maryland Department of the Environment  
Climate Change Program – Climate Pathways Report  
1800 Washington Boulevard  
Baltimore, Maryland 21230  
Via email: [susan.casey1@maryland.gov](mailto:susan.casey1@maryland.gov)

Re: Comments on Climate Pathways Report

Dear Climate Change Team:

The Restaurant Association of Maryland appreciates the opportunity to provide comments on the Climate Pathways Report. We have serious concerns that the goals in this report for transitioning to zero-emission water heating and appliances in commercial buildings will be particularly challenging for restaurants and foodservice facilities.

Restaurants rely on the efficiency and performance of gas for commercial cooking. Electric cooking equipment is generally more expensive, costlier to operate, and lacks the high performance and BTUs that commercial kitchens require. Some restaurants rely specifically on gas cooking methods as part of their menu concept, including open kitchen concepts designed for flame cooking.

Although often mentioned as an alternative to gas, electric induction cooking has limitations. Induction cooktops require pans with magnetic flat bottoms, and generally cannot achieve the same high temperatures as gas-fueled equipment. And induction is not an option for other cooking methods like baking, grilling, broiling or woks.

Restaurants also rely on the efficiency of gas to meet hot water needs. Electric water heaters are not as efficient for foodservice uses that require higher water temperatures and flow rates to meet operating demands and sanitation requirements.

Maryland's General Assembly exempted foodservice commercial tenants from the greenhouse gas emissions or energy use calculations of covered buildings in the Climate Solutions Now Act. Montgomery County exempted foodservice commercial kitchens from their all-electric building standards for new construction that will become effective in late 2026. Other jurisdictions around the country have also made appropriate exemptions for restaurants or commercial kitchens in their related policies.

We urge MDE to consider appropriate exemptions for restaurants and foodservice facilities in the Greenhouse Gas Emissions Reduction Plan that will be submitted to the Governor and General Assembly later this year. Lack of such appropriate exemptions would hinder restaurant industry growth in Maryland.

Thank you for your consideration of these comments and concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Melvin R. Thompson".

Melvin R. Thompson  
Senior Vice President