



November 9, 2019

Sierra Club
7338 Baltimore Ave, Suite 102
College Park, MD 20740

Maryland Commission on Climate Change
1800 Washington Blvd
Baltimore, MD 21230

RE: Comments Regarding Maryland Commission on Climate Change Annual Report
Recommendations

Dear Commissioners,

We are deeply concerned that the Commission on Climate Change (the Commission) and the Mitigation Working Group (MWG) within the Commission are failing to meet their charge of providing recommendations to the Governor and General Assembly on strategies and programs to reduce climate-disrupting pollution.

For consecutive years, the recommendations from the MWG fail to propose any specific new or innovative programs to tangibly reduce climate pollution. Instead, the MWG is again proposing to recommend merely analysis, study, and coordination, in many cases on programs that already exist. The state, nation, and planet are facing an existential climate emergency, yet Maryland's primary stakeholder body charged with considering climate mitigation efforts is not recommending action to reduce pollution. This is unacceptable and damaging to our efforts to fight climate change.

We urgently request that the Commission adopt the following tangible recommendations. Many of these recommendations have been included in previous Commission Annual Reports or discussed in the MWG and in the public for the past two or more years.

Electricity Sector

- **Responsible phase-off of coal power plants in Maryland¹** — We recommend that by the end of 2020 the General Assembly and the Governor work with public stakeholders to develop and finalize a responsible and specific plan for transitioning from Maryland's six large-scale coal electricity generators over the ensuing decade, while maintaining reliable power, and for the establishment of programs that protect and support

¹ This recommendation was included in the 2018 Annual Report of the Commission, within the Minority Note, but was not adopted by the Governor or the General Assembly. (pages 64-65, https://mde.maryland.gov/programs/Air/ClimateChange/MCCC/Documents/MCCC_2018_final.pdf)

communities and workers traditionally reliant on these fossil fuel facilities before those coal plants are closed.

- The plan should follow the best practices for just transition as detailed in Appendix I of the Maryland Department of the Environment's (MDE) Draft 2019 Greenhouse Gas Reduction Plan, including, but not limited to:
 - Providing a timeline for the phase-out of activities and facilities
 - Receiving input from workers and impacted communities early in the planning stages
 - Responding to the concerns, feedback, and questions from those impacted stakeholders
- **No new gas-fired power plants in Maryland** — We recommend that the Governor or General Assembly adopt a moratorium on the construction or permitting of any gas-fired power plants in the state that are not already online and fully operational.
- **100% Clean Electricity** — We recommend the Governor, MDE, and the Maryland Energy Administration (MEA)—in consultation with the General Assembly, relevant stakeholders, and the public—develop a plan to reach 100% clean electricity no later than 2040 that does not include electricity generated in Maryland from fossil fuels like coal, gas, and oil, nor additional ratepayer or taxpayer subsidies for nuclear power.

Transportation

- **Electric Buses** — We recommend MDE and MDOT set a goal to fully electrify bus transport in Maryland by 2035, including setting aggressive targets for the rapid deployment of EV school buses, as well as provisions for low-interest financing.
- **Funding Public Transit and Sustainable Land Use** — We recommend that the state expand funding for WMATA and MTA. Maryland should also provide funding for critical projects such as the Baltimore Red Line, the Corridor Cities Transitway, and MARC expansion initiatives. We recommend the state also fund and support sustainable land use initiatives such as adding a bicycle and pedestrian crossing on the rebuilt Harry W. Nice Memorial/Senator Thomas "Mac" Middleton Bridge.
- **Stop Highway Expansion** — We strongly recommend that Maryland not expand or build new major highways. Maryland should not expand I-495 (the Capital Beltway), I-270, or the Baltimore Washington Parkway, or add a third span across the Potomac. These projects do not solve congestion issues and induce demand for more cars on the road, exacerbating air, water, climate, and noise pollution. Instead, Maryland must invest in real solutions that avoid and reduce congestion including funding transit oriented development projects, expanding affordable housing, and funding public transit as listed above.

Buildings

- **No new gas in Government buildings** — We recommend that the Governor issue an Executive Order or the General Assembly enact legislation to end gas hookups for state-owned new construction projects and instead rely on air source heat pump systems and induction cooking alternatives, where appropriate.

- **Incentivize Switching from Fossil Fuel Heating and Appliances to Electric** — We recommend the Public Service Commission adopt a new program for EmPOWER Maryland that specifically incentivizes the switching from fossil fuels (gas, propane, heating oil, etc.) to electric heating systems and appliances. The program should seek to annually incentivize the retrofit of 40,000 homes in order to meet a goal of a decarbonized residential building sector by 2050.

Other

- **Moratorium on additional new fracked gas infrastructure** — We recommend the Governor direct agencies to place a moratorium on approval of permits and applications of new fracked gas infrastructure such as new pipelines and compressor stations.
- **Forest Protection and Gains** — We recommend that the General Assembly and the Governor require net forest and tree canopy gains in Maryland by 2025 through the enactment of various forest management and tree planting programs and initiatives; including a strengthened Forest Conservation Act.²

This list of recommendations is not all-encompassing of what we believe needs to be done in the state to mitigate climate disruption. Maryland needs to adopt more robust zero waste policies and practices by phasing off of polluting trash incinerators and expanding composting, expand healthy soils and wetlands practices to draw-down and sequester carbon through natural processes, and provide more funding for the equitable deployment of more light-duty electric vehicles.

A body that is charged to recommend measures to mitigate climate disruption, but does not provide any recommendations for the state to reduce pollution, is a body that is broken. The Commission must fill in the missing pieces left by the MWG's failure to do its job by adopting specific recommendations to reduce climate pollution in its 2019 Annual Report.

Thank you for your time and consideration. Please do consider these recommendations and do not hesitate to reach out to the Sierra Club for additional information.

Sincerely,

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² This recommendation was included in the 2018 Annual Report of the Commission, within the Minority Note, but was not adopted by the Governor or the General Assembly. (pages 66, https://mde.maryland.gov/programs/Air/ClimateChange/MCCC/Documents/MCCC_2018_final.pdf)