



September 17, 2020

Kim Coble and Michael Powell
Co-Chairs
Mitigation Working Group
Maryland Commission on Climate Change

CC: Chris Hoagland
Climate Program Manager
Maryland Department of the Environment

Dear Kim and Michael,

The Sierra Club would like to propose the following climate actions for consideration by the Maryland Commission on Climate Change (the "Commission") for inclusion in its 2020 Annual Plan. We urge the Commission to adopt climate action recommendations in 2020 which, if implemented, would reduce climate pollution. In recent years, the Commission often has failed in its Annual Plans to meet its statutory requirement to guide the Governor and General Assembly "on ways to mitigate the causes of, prepare for, and adapt to the consequences of climate change." We hope that in 2020, in the midst of the ongoing and worsening climate crisis, the Maryland Commission on Climate Change will meet its statutory obligations to recommend specific mitigation practices, policies, and programs.

Our suggested actions are the steps we believe the Commission can and should put forward in its 2020 Plan. They do not, however, fully encompass all of the strategies the Sierra Club believes the state should enact and implement to reduce climate pollution, create union jobs in the clean energy economy, and advance the climate justice movement, but these are steps we believe the Commission can recommend in 2020. We appreciate Secretary Grumbles' recent recognition that Maryland must increase its current target for climate pollution reduction, and our requests are designed to ensure that promised reductions will be achieved.

Emissions Targets and Accounting

- The Commission should recommend the General Assembly adopt updated greenhouse gas emission reduction targets in the Greenhouse Gas Reduction Act to better reflect the latest science from the Intergovernmental Panel on Climate Change. This includes a 60% reduction by 2030 and a net zero emissions target by 2045.
- The Commission should recommend the Maryland Department of the Environment (MDE) update its reporting and benchmarking emissions inventories and the General

Assembly update climate action laws to evaluate the warming potential of methane pollution based on modern science, including an infrastructure leakage rate of at least 3 percent and the 20-year warming potential associated with methane emissions.

State Government Consideration of Climate Change Impacts & Climate Justice

- The Commission should recommend that the General Assembly follow the lead of the New York legislature and require climate change actions by all state agencies. This action should include the implementation of strategies to reduce greenhouse gas emissions, and in consideration and issuance of permits, licenses, and other administrative approvals and decisions, consideration of whether such decisions are inconsistent with or will interfere with the attainment of the statewide greenhouse gas emissions reduction targets of the Greenhouse Gas Reduction Act.
- The Commission should recommend that the General Assembly require the PSC to take a more active role in energy planning and elevate climate change as a component of all decision making, as detailed in 2020's HB 531.
- The Commission should recommend that MDE work with the public, other agencies, and the General Assembly to identify environmental and climate justice communities, and set forth the threats those individual communities are facing. Further, the Commission should recommend that MDE complete a thorough community environmental equity analysis of the impact of its suite of climate action policies, programs, and proposals on communities of color, low-income communities, communities historically overburdened by pollution, and communities underserved by our historic energy and transportation systems.

Electricity Sector

- The Commission should recommend the General Assembly and Governor establish a "100% by no-later-than 2040" electricity plan that relies on clean, renewable electricity from wind, solar, and storage technologies, and is focused on providing the benefits of clean energy to overburdened and underserved communities first.
- The Commission should recommend the General Assembly establish a clear, enforceable schedule to responsibly manage Maryland's transition off its remaining coal-fired power plants by no later than 2030, including the creation of a workforce and community transition plan to support laid-off workers and impacted communities, following the recommendations within Appendix I of the Draft GGRA Plan and further implementing the General Assembly's intent to "...eliminate carbon-fueled generation from the state's electric grid..." as codified in §7-702 (a)(2) of the Public Utilities Article.¹
- The Commission should recommend the Governor and state agencies halt the construction or permitting of any gas-fired power plants in the state that are not already online and fully operational.

¹ This recommendation was presented to the Mitigation Working Group in February 2020.
<https://mde.maryland.gov/programs/Air/ClimateChange/MCCC/MWG/SIERRA%20CLUB%20Presentation%20on%20Coal.pdf>

Transportation Sector

- The Commission should recommend the General Assembly Reintroduce or modify the Transit Safety & Investment Act of 2019 (HB 368) to fully fund the investments outlined in the 2019 MTA's Capital Needs Inventory so the MTA system is safe and reliable for people to use.
- The Commission should recommend the General Assembly mandate that no later than 2024 all bus replacements be for zero-emissions buses.
- The Commission should recommend the state ensure that future federal response or recovery aid for public transportation improves worker protections through hazard pay, and sick leave and all future stimulus money dedicated for public transit is only used for that purpose.
- The Commission should recommend the state withdraw the Maryland Department of Transportation's decision to widen I-495 and I-270 with toll lanes.
- The Commission should recommend the state reverse MTA's harmful decisions to cut bus service by 20%, reduce MARC, commuter local bus, and paratransit service, and cut the MTA's already strained six year capital budget for critical safety needs by \$150 million.
- The Commission should recommend the state ensure that the Purple Line Light Rail project gets built without further delay and build the East-West Baltimore Red Line.

Buildings Sector

The Sierra Club participated extensively in the Buildings Subgroup formed by the Mitigation Working Group during 2020. This nearly four-month-long process included extensive information presented by experts and stakeholders, which information is confirmed by MDE's modeling collaboration with E3 for the Final GGRA Plan. The information demonstrates the need for deep electrification of the building sector to respond to the climate crisis, and showcases that significant progress can begin immediately and cost effectively.

Based on this process and our work on this sector across the country, we offer support for a significant portion of the recommendations presented in the September 11, 2020 draft report from the Buildings SubGroup, *Decarbonizing Buildings in Maryland - Buildings SubGroup Report to the Mitigation Work Group*. by Mark Stewart, convener of the SubGroup. Specifically, our current positioning on the recommendations in the September 11, 2020 report are:

- Recommendation 1 -- Support
- Recommendation 2 -- Support
- Recommendation 3 -- Support with a strong Preference for Option A
- Recommendation 4 -- Support with a strong Preference for Option A
- Recommendation 5 -- Support
- Recommendation 6 -- Neutral
 - Should the recommendation move forward we believe the study would most benefit from A) an evaluation of exit strategies for gas utilities, heating oil, and propane distributors and their customers, especially LMI customers; B) creating a training and workforce needs assessment; C) evaluation of policies and

programs that will foster the creation of high-quality, family-supporting, and union jobs in the building electrification sector; D) identification of known gaps in the equitable distribution of housing and housing programs to better inform proposed action steps, and; E) establishing statewide targets for building sector greenhouse gas reductions.

- Recommendation 7 -- Support
- Recommendation 8 -- Support

Thank you for your time and consideration. Please let me know if you have any questions regarding the suggested climate actions in this letter and we look forward to the opportunity to discuss these with the MWG.

Sincerely,

David Smedick
Senior Campaign Representative
Sierra Club

CC:
Josh Tulkin
Chapter Director
Sierra Club Maryland Chapter

Rosa Hance
Chapter Chair
Sierra Club Maryland Chapter

Paula Posas
Deputy Director
Sierra Club Maryland Chapter

Lindsey Mendelson
Campaign Representative
Sierra Club Maryland Chapter

Mark Posner
Legislative Chair
Sierra Club Maryland Chapter