



# Maryland Climate Coalition

2 January 2019

Ben Grumbles  
Secretary  
Maryland Department of the Environment  
1800 Washington Blvd  
Baltimore, MD 21230

RE: Comments regarding Maryland's 2019 Draft Greenhouse Gas Reduction Plan

Dear Secretary Grumbles,

We, the undersigned organizations, respectfully submit the following comments regarding Maryland's Draft Greenhouse Gas Reduction Plan ("Draft Plan").

The globe is in the midst of an unprecedented climate crisis, caused by the unsafe and poorly-mitigated burning of fossil fuels. The United Nations' Intergovernmental Panel on Climate Change (IPCC) has made it overwhelmingly clear that we have 10 years to reduce our climate-disrupting emissions to levels that will avoid the worst impacts of a warming planet. The world must cut GHG emissions 7.6% per year to keep warming below 1.5 degrees C and avoid the threat of irreversible climate destabilization. As one of the wealthiest states in one of the wealthiest countries in the world, Maryland has a responsibility to lead with more ambition and more aggressive pollution reduction plans and policies.

After the Maryland Department of the Environment (MDE) did not follow state law by submitting the Draft Plan by December 31, 2018, and instead submitted an unambitious Draft Plan more than nine months overdue, we are concerned that our state is failing to respond to the urgency of the climate crisis.

We appreciate that the Draft Plan recommends that the state collectively develop and participate in a regional cap-and-invest system aimed at reducing pollution from the transportation sector and we encourage Maryland and other Transportation and Climate Initiative states to create a program that will reduce emissions from regulated sources by at least 45% by no later than 2032. Further, we support the state's efforts to expand the Regional Greenhouse Gas Initiative, continue and strengthen EmPOWER Maryland. We appreciate the research and best practices named in the Just Transition Chapter of the Draft Plan; however, we are disappointed that the Chapter does not provide specific



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recommendations for ways that Maryland should fund transition programs, or specific updates to or creation of new Maryland programs to address the issues raised.

Unfortunately, the plan fails to put us on track to meet mid-century targets identified by the world's leading climate scientists as necessary to avoid the worst of climate disruption, and provides no clear policy specifics on how to achieve goals. As an example, the proposed "Clean and Renewable Energy Standard" (CARES) is very thin on details, has been developed with minimal public input, and continues to rely on the burning of fossil fuels which are neither clean nor renewable.

The Maryland Climate Coalition has a vision for climate action that looks at the entirety of the greenhouse gas problems our state is experiencing from every major source—not just energy usage. We know a solution that will achieve net zero greenhouse gas emissions by 2045 is necessary. We must address energy production, transportation, agriculture, and housing as well as sequestration strategies such as forestation and healthy soils.

Therefore, we call for the Final Greenhouse Gas Reduction Plan ("Final Plan") to:

- Seek to achieve greenhouse gas emissions reductions consistent with reductions implied for wealthy nations in the IPCC's Special Report on Global Warming of 1.5° Celsius—a 63 percent reduction by 2030 and net-zero by 2045.
- Update its reporting and benchmarking emissions inventories and 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.
- Achieve deeper reductions from the electricity sector by:
  - Setting forth a 100% by 2040 electricity plan that is made up of clean, renewable electricity from wind, solar, storage technologies, and focused on providing the benefits of clean energy to overburdened and underserved communities first.
  - Establishing a clear, enforceable schedule to responsibly phase Maryland off its remaining coal-fired power plants by no later than 2030, supplemented with a workforce and community transition plan to support laid-off workers and impacted communities, following the recommendations within Appendix I of the Draft Plan. While these impacts are likely to occur first in the coal sector, they quickly ripple through the entire community and beyond, even more so as coal closures are followed by other fossil plant closures.



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- Recommending that the state immediately halt the construction or permitting of any gas-fired power plants in the state that are not already online and fully operational.
- Recommend and implement aggressive, innovative, policy solutions to transform our transportation systems by expanding public transit, bikeable and walkable infrastructure, and electric vehicles, including but not limited to:
  - A withdrawal of major highway expansion plans paired with a more robust focus on programs to reduce vehicle miles traveled and increasing public transit ridership.
  - Establishment of a program to build-out and operate a 100 percent electric transit and school bus fleet by 2035.
  - Identification of funding sources for new transit projects that reduce pollution and get people to work, school, and economic opportunity.
- Propose more robust programs to significantly lower the emissions from the use of fossil fuels in our commercial and residential building sectors by:
  - Halting the expansion of gas use in new buildings by prohibiting the connection of new construction to gas lines.
  - Requiring all new residential buildings above a certain size be net zero buildings by 2022 and all new commercial buildings be net zero by 2025.
  - Developing a plan for retrofitting existing buildings, e.g., 40% conversion of oil and propane and 20% natural gas to electricity by 2030; 80% oil and propane and 60% natural gas by 2040; and 100% in 2050.
  - Providing more specifics by which the Public Service Commission or General Assembly may incentivize the transition of existing buildings away from on-site fossil fuel consumption, specifically gas, to electric heating and cooking alternatives.
  - Recommending the strengthening of the EmPOWER Maryland program as soon as possible to measure program success by reduction of greenhouse gas emissions rather than simply kilowatt hours.

Additionally, the Draft Plan's discussion on equity and climate justice within Chapter 6 is inadequate. This section should identify environmental and climate justice communities and the threats those individual communities are facing. To supplement that practice, we request a thorough community environmental equity analysis regarding the impact of the draft plan, its programs, and its policies on communities of color, low-income communities, communities historically overburdened by pollution, and communities underserved by our historic energy and transportation systems.



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As a supplement to this letter, we have provided a set of guiding principles which we believe should serve as a critical lens through which to assess legislation, policies, and programs purporting to confront the challenges and threats to Marylanders posed by climate change and environmental degradation.

We look forward to working with you to improve upon the Draft Plan and ultimately publish a Final Plan that embodies the attached guiding principles for climate action and includes our recommended upgrades to the Draft Plan.

Respectfully,

1. 1199SEIU
2. 350.org
3. Central Maryland Transportation Alliance
4. Chesapeake Climate Action Network
5. Chesapeake Physicians for Social Responsibility
6. Climate Law & Policy Project
7. Climate XChange
8. DoTheMostGood Montgomery County
9. EcoLatinos, Inc.
10. Environment Maryland
11. Frack-Free Frostburg
12. Greenbelt Climate Action Network
13. Howard County Climate Action
14. Indivisible Howard County
15. Institute for Energy and Environmental Research
16. Interfaith Power and Light (DC.MD.NoVA)
17. League of Women Voters of Maryland
18. Maryland Legislative Coalition
19. Maryland League of Conservation Voters
20. Sierra Club
21. Sunrise Movement Howard County
22. Takoma Park Mobilization Environment Committee
23. Towson Unitarian Universalist Church Green Sanctuary Committee
24. Unitarian Universalist Legislative Ministry of Maryland
25. Waterkeepers Chesapeake