

CLPP Recommendations to the Mitigation Working Group

1. GHG Reduction Goals in the GGRA

CLPP favors the 60% by 2030 goal or a compromise between 50% and 60% (e.g., 55%). A 50% reduction from 2006 levels would be consistent with the 2018 IPCC target, but recent events (floods, droughts, wildfires) demonstrate that climate impacts are greater than scientists anticipated, hence, the IPCC targets may need to be strengthened.

2. Other provisions in the GGRA

The Commission should consider recommending relaxation of the economic/jobs constraints in the GGRA. MDE modeling shows that it may be possible to devise a 50% by 2030 plan without violating these constraints, but 60% is likely out of reach. Beyond 2030, MDE modeling shows a very slight reduction in future jobs and GSP (less than 0.5% of jobs in 2040 and 0.1% of GSP, which we believe is in the margin of error). Nevertheless, the current GGRA language would not permit MDE to adopt this scenario (PS2) as a long term plan.

The state should have the flexibility to identify the scenario that yields the greatest economic benefit and job growth while achieving the GGRA goals, even if those benefits are less than no-action scenarios. In § 2–1206(8)(vi), we recommend replacing “Produce a net economic benefit to the State’s economy and a net increase in jobs in the State” with “Produce the greatest net economic benefit to the State’s economy and net increase in jobs in the State consistent with the requirements of § 2–1205 of this subtitle.”

If necessary, as a backstop, economic and job loss could be limited to 1% of GSP relative to the no-action alternative.

We agree with all the submitted comments in this section.

3. Environmental/Climate Justice

Low income households in MD have received below average benefits from programs like EmPOWER, which improves energy efficiency by 2% per year statewide but improves low income energy efficiency by only 0.4% per year, despite the fact that low income households spend a disproportionately large share of their disposable income on energy.

MDE should coordinate with MEA, DHCD and other agencies to address the challenge of low-income households receiving insufficient benefits under the State’s energy efficiency and weatherization assistance programs.

4. Transportation

The Commission should recommend that, beginning in FY 2022, all new school buses purchased by county boards must be zero-emission electric vehicles and, beginning in FY 2024, all new school buses purchased for use under a contract with a county board must be zero-emission EVs (HB1451 Note: this bill sets 2026 as date for privately owned buses).

The commission should recommend that, beginning in FY 2022, all purchases or leases of State fleet vehicles must be zero-emission electric vehicles (HB1233).

The Commission should recommend that by 2030, at the latest, all new light duty vehicles sold or registered in the state be zero-emission vehicles.

CLPP agrees with other submitted comments in this section.

5. The Power/Electricity Sector

In furtherance of a State goal to decarbonize and achieve 100% clean electricity no later than 2040, the Commission should recommend that the State implement a moratorium on natural gas pipelines.

CLPP generally agrees with all comments in this section, although we believe that limiting MD's energy resources to wind, solar and storage is too restrictive. Other technologies, e.g., geothermal and green hydrogen, can play a valuable and necessary part in eliminating MD's GHG emissions. We support the combustion of forest and lumber waste only if the carbon is captured and sequestered (BECCS). Otherwise, forest regrowth will not occur quickly enough to safely offset emissions from combustion of waste.

6. Buildings

The Commission should recommend that the Maryland Net Zero Energy Schools Program be funded sufficiently to finance 100% new net zero schools in the state as well as cost effective retrofits of all existing public schools.

At a minimum, all public schools in the State should have solar roofs or access to offsite solar where solar roofs are not feasible or cost effective.

All public schools that require replacement of heating, ventilation or air conditioning systems should be retrofitted with geothermal heat pumps and water heaters.

CLPP supports all the recommendations in the Buildings Subgroup report (see CLPP Comments on Decarbonizing Buildings in Maryland Recommendations, Discussion Draft 9-11-20, submitted 9-17-20).

7. NWL/Carbon sequestration

The State forest inventory is outdated and likely significantly overstates the size of the forest and soil sink in Maryland. The inventory should include the most conservative estimates justified by science.

CLPP agrees with all comments in this section but notes that carbon credits for sequestration require further study before being implemented. Credits should be discounted to account for potential release of sequestered carbon. Alternatively, sequestered carbon must be closely monitored, and all releases should be debited as soon as they occur.

8. Short-lived Climate Pollutants

MDE has stated that it intends to account for out-of-state methane emissions from MD consumption of natural gas. CLPP recommends that MDE also account for out-of-state methane emissions from MD consumption of imported electricity.

We agree with the comments in this section.

9. Process

CLPP recommends that MDE update its GGRA plan and the adequacy of GGRA targets on a rolling basis and issue annual reports.

CLPP disagrees with the third bullet.