

## Townsend, Erle

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**From:** Nathaniel Pace <Nathaniel.Pace.564145645@foradvocacy.com>  
**Sent:** Friday, December 22, 2023 3:38 PM  
**To:** DEP Rule Comments  
**Subject:** Comment on Chapter 127-A: Advanced Clean Cars II Program

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Dear Mobile Sources Section Chief Lynne Cayting,

I am writing to express my strong opposition to the proposed regulation to adopt California's Advanced Clean Cars II regulation, requiring that 82% of new vehicles sold in the state be zero-emissions vehicles (ZEV) by 2032. While I understand the importance of reducing greenhouse gas emissions and transitioning to cleaner transportation options, this proposed regulation is premature and will negatively impact consumers and the economy.

The proposed regulation overlooks the current limitations of electric vehicles (EVs) and the supporting infrastructure. While EV technology has shown promising advancements in recent years, challenges must be addressed before completely phasing out internal combustion engine vehicles. Range anxiety, limited charging infrastructure, and higher upfront costs remain significant barriers to widespread EV adoption. Implementing a ban on traditional vehicles without adequately addressing these concerns will result in transportation limitations for residents, particularly those in rural areas or with longer commutes.

Furthermore, the automotive industry is embracing new technology to make vehicles cleaner and more efficient, which includes hydrogen, new synthetic fuels, alternative fuels, and improvements to the internal-combustion engine. Simply put, the government should allow the market to continue to innovate all forms of technology that significantly reduce vehicle emissions, not just battery electric vehicles.

Moreover, the proposed regulation fails to consider the economic impact on consumers and the automotive industry. Many Mainers rely on affordable and accessible transportation options to meet their daily needs. A sudden shift towards electric vehicles will increase vehicle prices, making it unaffordable for low- and middle-income households to purchase new cars. This would disproportionately affect those who cannot afford the upfront costs of EVs or lack access to charging infrastructure at their residences.

Additionally, the proposed regulation neglects the potential consequences for the automotive industry and related businesses. Maine's automotive sector, including dealerships, repair shops, and service providers, contributes significantly to the local economy. The ban on gas- and diesel-powered vehicles will lead to job losses and financial hardships for these businesses, ultimately impacting the state's overall economic stability.

In conclusion, I request that the Bureau of Air Quality Department of Environmental Protection reject the proposed regulation to adopt California's Advanced Clean Cars II regulation. Balancing environmental goals and the practicality of implementing such measures is crucial. I believe a collaborative effort that involves stakeholders from various sectors will yield better results for Maine's environment, economy, and residents.

Thank you for your time and consideration. I trust that you will consider these concerns when making decisions that will shape the future of transportation in Maine.

Regards,  
Nathaniel Pace

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