

Townsend, Erle

From: James Melloh MD (toxmelloh@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Thursday, January 11, 2024 11:29 AM
To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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Dear Board of Environmental Protection,

These measures are critical for our future health and the economy. They are vital for our grandchildren and all life on Earth.

Dear Board Members,

To address the state's largest source of transportation emissions, Maine must adopt the Advanced Clean Cars II (ACC II) program on the updated timeline in 2024. This reposting already loses a model year, so there is even more urgency to pass today!

This rule will provide Mainers with cleaner air and the ability to choose from a wider array of electric vehicles, all while saving families money at the pump. The rule also includes provisions that advance equity in the zero-emission vehicle transition and provide consumers certainty about the quality and durability of clean cars and trucks and their batteries.

We must adopt the proposed rule now to ensure that Maine hits its own mandatory 2030 climate objective. In addition, to avail Mainers of the rule's full suite of climate, health, and economic benefits while enhancing certainty for Maine's people, businesses, utilities, and regulators, we urge you to go further than the proposal which stops short of its full potential by running only through 2032. The rule should continue ramping up zero-emission vehicle requirements, culminating with a 100% requirement for 2035 and beyond. The state is ready for ACC II, and we cannot afford to delay implementation of this crucial standard.

Maine also needs to adopt the Heavy Duty Omnibus rule and Phase 2 Greenhouse Gas standards. The Omnibus rule will cut NOx emissions from heavy-duty trucks by roughly 75% below current standards beginning in 2024 and 90% in 2027. In addition to cleaning up NOx, the Omnibus rule looks to institutionalize PM pollution controls and prevent backsliding by

adopting a more stringent standard that aligns with current industry certifications. These reductions add up to \$36 billion in statewide health benefits from 3,900 avoided premature deaths and 3,150 hospitalizations from 2022 to 2050. Phase 2 standards for medium- and heavy-duty vehicles through model year 2027 will improve fuel efficiency and cut carbon pollution to reduce the impacts of climate change, while bolstering energy security and spurring manufacturing innovation.

Finally, we strongly urge Maine to adopt complementary MHDV emission standards, including the Innovative Clean Transit rule, which would require public transit agencies in the state to gradually transition their fleets to zero emissions buses, with the goal of having all operating buses on the road be zero-emission by 2040. Further, the state should adopt the large entity reporting requirement component of the ACT rule and set the reporting threshold at an appropriate level for Maine. The state should also move expeditiously toward adoption and implementation of California's Advanced Clean Fleets rules as soon as those are finalized.

Maine communities need and deserve equitable access to clean air. And our markets need certainty to adopt EVs. Please adopt these standards now!

Sincerely,

James Melloh MD
47 Sprague St
South Portland, ME 04016
toxmelloh@gmail.com
(207) 786-2346

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