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*via email:* rulecomments.dep@maine.gov

**RE: Support Full Adoption of Advanced Clean Cars II standards (06-096 C.M.R. Chapter 127-A) and Advanced Clean Trucks standards (06-096 C.M.R. Chapter 128)**

The American Lung Association in Maine calls on the State of Maine to join the growing list of states to fully adopt the Advanced Clean Cars II (ACC II) and Advanced Clean Trucks (ACT) standards to reduce harmful emissions from the transportation sector. Transportation continues to be a leading source of harmful air and climate emissions in the United States and zero-emission transportation policies are a critical tool to address these risks to public health. Maine has previously taken advantage of its Clean Air Act authority to implement more health-protective vehicle emission standards, and we support moving ahead with the full suite of ACC II and ACT programs without delay.

Continuing this clean air leadership through the ACC II and ACT rules will provide much-needed emission reductions in support of healthier air for all residents, and especially those most impacted by transportation pollution. The Lung Association's "[State of the Air](#)" 2023 report found that Maine is home to over 130,000 adults and children living with asthma who face greater risk and need stronger protections against harmful ozone ("smog") and particle ("soot") pollution. Air pollution can cause a wide range of health emergencies including asthma attacks, heart attacks, and other respiratory and cardiovascular impacts. This is especially true for lower-income communities and communities of color which often bear greater transportation pollution burdens.

Major disparities continue to exist in terms of access to clean, healthy air and transportation sources represent a major source of this harm. The United States Environmental Protection Agency estimates that 72 million Americans live near major freight routes, noting that those residents are more likely to be exposed to harmful air pollution impacts, tend to have lower incomes, and tend to be people of color. For these residents, the adoption of the ACT and ACC II programs will provide critical relief locally, support healthier air across the state, and reduce climate pollution.

The Lung Association calls on Maine to adopt the ACC II and ACT programs to reduce air pollutants, health disparities and greenhouse gas emissions in support of a healthier future for all:

**Rule 127-A: Advanced Clean Cars II Standards**

Adopting the ACC II standards will clean up harmful emissions from new combustion-powered passenger vehicles while also charting a course to increasing zero-emission vehicle sales. While the proposal for the ACC II adoption runs through 2032 and achieving 82 percent zero-emission new vehicle sales, we encourage the Board to consider adoption of the full ACC II program with 100 percent of new vehicles sold being zero-emission by 2035. We encourage full adoption to extend health and clean air benefits and align Maine's policy with the full ACC II policies that Massachusetts and Vermont have recently adopted and that Connecticut, Rhode Island and several other states are expected to complete this calendar year. As a leading source of transportation emissions that harm our health and climate, the cleaning up and transitioning the passenger vehicle fleet to zero-emissions is a critical public health intervention.

**Rule 128: Advanced Clean Trucks Standards**

Maine is a signatory to the 2020 Multi-State [Memorandum of Understanding](#) in support of Zero-Emission trucking and, more recently contributed to the 2022 [zero-emission action plan](#) for medium- and heavy-duty vehicles developed along with 16 other states, Washington, DC, and the Province of Quebec. Adopting ACT will address the harms of trucking pollution by increasing sales of zero-emission medium- and heavy-duty vehicles over the coming decades. These standards are designed to ensure that 40 to 75 percent of new vehicle sales are zero-emissions by 2035, depending on weight classification. The ACT standards will save lives and reduce local exposures to diesel exhaust and fine particle emissions known to cause lung cancer and a host of other negative health consequences.

The transition to zero-emission transportation through these policies will provide critical health benefits to all residents and directly address disparities in our most vulnerable communities. Maine must establish stronger Zero Emission Vehicle (ZEV) standards to secure real-world emission reductions that combustion vehicles cannot deliver. The Lung Association's "[Zeroing in on Healthy Air](#)" report projects that Maine's transition to zero-emission transportation and clean energy could generate major public health benefits through 2050, including:

- \$4.5 billion in public health benefits
- 400 premature deaths avoided
- 5,870 asthma attacks avoided
- 31,000 lost workdays avoided

We urge Maine to approve the full ACC II and ACT standards without delay so residents can breathe healthy air. Please contact me at [Lance.Boucher@Lung.org](mailto:Lance.Boucher@Lung.org) or 207.624.0325 for more information.

Sincerely,



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