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To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program

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Acadia Center respectfully submits the following comments in support of the Department of Environmental Quality (DEP) Rulemaking, *06-096 Chapter 127, Advanced Clean Cars II Program (ACT)*. The DEP is proposing to adopt California's Advanced Clean Cars II Program to accelerate sales of zero-emission light duty vehicles (LEV) and reduce greenhouse gas emissions and criteria air pollutants from on-road mobile sources in Maine, ensuring that manufacturers offer affordable zero-emission vehicle choices in Maine. Current LEVs are extraordinary vehicles in every regard, and their owners in Maine are enthusiastic advocates for LEVs. For good reason, modern LEVs are capable in every way, and cost less than ICE vehicles to operate and maintain. Moreover, LEVs are becoming ever more affordable each year, with some LEVs now competing with equivalent ICE cars. Of course, change does not always come easy, but in these times as we see the environment flaring into natural disasters all around us, the time to act in now.

[Acadia Center](#) is a non-profit, research and advocacy organization incorporated in Maine and committed to advancing the clean energy future by offering real-world solutions to the climate crisis. Acadia Center tackles complex problems, identifies clear recommendations for reforms, and advocates to create significant change that supports a low-carbon economy across the Northeast which can then be a model for application elsewhere. Acadia Center identifies regional, state, and local improvements that will dramatically reduce carbon pollution and improve quality of life throughout the Northeastern United States.

Maine is nearly 100% dependent on petroleum to fuel rail, truck, bus, aerospace, marine, and automobile transportation vehicles. Transportation accounts for more than half of the state's energy use, emissions, and costs. Transportation is responsible for 54 percent of Maine's annual greenhouse gas emissions. When emissions are analyzed by vehicle type, 59% of Maine's transportation-related emissions are from light-duty passenger cars and trucks; 27% are from medium- and heavy-duty trucks; and the remaining 14% come from rail, marine, aviation, and utility equipment vehicles. Gasoline and diesel fuel prices can be extremely volatile due to global, national, and regional constraints. Maine is a relatively rural state, necessitating widespread travel within a limited transportation infrastructure base. In a planned economy-wide transition to electrified transportation, EVs for all vehicle types must be supported and incentivized with appropriate regulations that promote the manufacture and operation of EVs. The Maine Climate Action Plan sets targets and goals to reduce emissions and transition to clean energy and transportation in the fast-approaching decades. Putting in place goals for climate action is only a first step, as the actualization of those goals rest largely on effective regulatory and implementation strategies and actions that follow. The proposed Chapter 127 rule advances the Climate Action Plan's recommendation, "By 2022, create policies, incentives, and pilot programs to encourage the adoption of electric, hybrid, and alternative-fuel medium- and heavy-duty vehicles, public transportation, school buses, and ferries."

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