TESTIMONY to The Board of Environmental Protection

as it considers

Chapter 127-A (Advanced Clean Cars II Program) and Chapter 128 (Advanced Clean Trucks Program) rules

28 August 2023

My name is Mal Carey. I'm a resident of Newcastle, Maine.

The Board has been asked by 150 Maine residents and three national environmental organizations to create a "boots on the ground" reality with wide-ranging, profound, and perhaps enduring economic and natural systems impacts.

I urge the Board to decline this opportunity to adopt the "California" rules.

With due respect, the elected Governor and Legislators are the appropriate policy guides and deciders of how our energy systems will morph to deal with climate change challenges. It is their role to raise and direct the needed funds. That "directing" will of necessity include crafting "Robinhood" cross subsidies to ameliorate the heating and transportation costs and functional impacts of any substantial shift from fossil fuels to electricity in Maine's rural energy profile.

Where I "come from" when approaching this issue:

I'm 81, retired (sort of)

I live in North Newcastle (Cow Sh*t Corner), at the edge of "rural" 100% wood space heat

I have a BA in Math, and a Career in Planning, Social Science Research IT, Higher Ed IT Management, GIS, and Scientific Programming

I'm on the Board of LCRPC (10 years) and hold the Public Seat on Maine

GeoLibrary Board (2023)

I think the IPCC is pretty much on the mark on slow moving issues, but the stability of the AMOC, Thwaites, Arctic Permafrost, & Clathrates is "iffy".

Family Gas Vehicles: 2000 Chevy plow truck for 1/4 mile driveway, Honda Civic 2008 275k, Honda Civic 2016 175k (2 Drivers)

Vehicle maintenance solely in local small shops: Community support, Dealer distance, and Cost!

The State of Maine under Mills has taken a very forward-looking approach to climate change. Maine's climate change mitigation investments are clearly rational given the human-driven trajectory of key natural systems. However, potential State-level climate change prevention investments which are not mirrored regionally, nationally, and beyond are almost assuredly for nought. While a clear distinction between the two in public discourse is often absent, an inchoate sense that the two part "plan" in the large is not well-engineered, thought out, or funded tends to emerge in extended conversation.

The "California" propositions were put forward by local branches of national environmental organizations in a manner which appears to have been chosen

to create a difficult-to-change reality in administrative law

to create a firm and aggressive time frame for vehicle electrification without reference to either supply-side or demand-side realities

to ignore geographically-determined/influenced functional requirements and financial capacity

The electrification of transportation and home heating which is practical today for a Portland-employed professional living in, say, Yarmouth, will be a long time coming for a majority of rural Maine residents.

The needed "electrification" build-out of the grid in this sparse market would be very expensive on a per customer basis. A quick view for one segment of Maine's "rural" can be seen at

https://www.versantpower.com/energy-solutions/connecting-renewable-resource s/hosting-capacity-maps/

In meme, tech, and market spaces (off-shore wind, grid-level storage, cost of money, inflation, long-term supply of key minerals, small nuclear, synthetic fuel, grid ownership, and a host of other "moving parts") which are churning, a formulaic lock-in to a west coast model doesn't seem all that wise.

Sincerely,

-mal carey-