

## Breton, Mary B

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**From:** Roger Crouse <scouterrlc@gmail.com>  
**Sent:** Monday, August 28, 2023 6:14 PM  
**To:** DEP Rule Comments  
**Cc:** Cyrway, Scott; LaFountain, David  
**Subject:** Comments on Chapter 127-A and Chapter 128

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Although I am submitting these comments shortly after the submission deadline, I hope you will still consider them.

The fact sheets for the proposed rules both contain information on the estimated fiscal impact of the rule. However, both descriptions of the fiscal impact appear to be woefully inadequate. Given the heavy dependence Maine residents and business have on trucks and cars, it would seem that much more effort is needed to evaluate the true financial implications on all residents and business in Maine.

The rules do not require the purchase of zero emission vehicles. However, the dramatic change necessary in the car and truck market needed to achieve the proposed standards will impact vehicle availability and costs across the State.

Manufacturers and dealerships have to make money to stay in business. If they are subsidizing one type of vehicle to incentivize its sale in Maine, they will need to make up their loss in the sale of other vehicles. This will likely result in more affluent areas of the State being able to buy ZEVs at discounted prices while more rural (and less affluent) areas will pay higher prices for traditional combustion engine vehicles. (Rural/less affluent areas of the State will face greater challenges adopting ZEV because ZEV will not be able to meet their needs 365 days a year and they cannot afford to buy a second vehicle.)

The Chapter 127 fact sheet includes a link to the State of California's Air Resources Board website ( [2]<https://ww2.arb.ca.gov/news/california-moves-accelerate-100-new-zero-emission-vehicle-sales-2035>) to provide supporting information regarding cost savings. However, this website indicates that the State of California is providing \$3.9 billion in subsidies to make ZEV affordable for all.

I could not find a reference in the rulemaking fact sheets of financial subsidies from the State of Maine. Additionally, it would seem that if California determined a \$3.9 billion state subsidy was needed, there must be a financial downside to the proposed rules.

Until a more thorough financial evaluation is completed, these rules should be tabled.

Thank you for your consideration.

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