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To: DEP Rule Comments
Subject: Comment on Chapter 101: Visible Emissions Regulation

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August 28, 2023

Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333-0017
Email: rulecomments.dep@maine.gov

RE: Comment on Chapter 127-A: Advanced Clean Cars II Program and Chapter 128: Advanced Clean Trucks Program

We, the undersigned 18 scientists, researchers, health professionals, and engineers respectfully submit this comment in support of the adoption of the Advanced Clean Cars II (ACCII) and Advanced Clean Trucks (ACT) rules to put Maine on path towards zero- emission vehicles.

Transportation is responsible for [54 percent](#) of Maine's annual greenhouse gas (GHG) emissions. The state's more than [1.1 million light-duty cars and trucks](#) and more than [100,000 medium and heavy-duty vehicles](#) make up [60 percent and 27 percent](#) of transportation sector emissions, respectively. By adopting the ACCII rule, Maine could avoid a cumulative 19.0 MMT of well-to-wheel GHG emissions, as well as 2,274 tons of nitrogen oxides (NOx) and 160 tons of fine particulate matter (PM2.5) by 2040.

The rule would also put Maine on track for the state goals in its climate plan *Maine Won't Wait* of 219,000 light-duty electric vehicles on the road by 2030. Meanwhile, the ACT rule would help Maine avoid a cumulative 22.13 MMT of GHG emissions as well as 20,440 tons of NOx and 182 tons of PM2.5. These rules are the top two transportation recommendations in Maine's 2021 Clean Transportation Roadmap because of their profound impacts on GHG emissions as well their clear signals to vehicle manufacturers to increase the delivery of zero-emission vehicles.

Not only are cars, trucks, and buses a drastic climate problem, but tailpipe emissions also contribute dangerous levels of nitrogen oxides and fine particulate matter that increases the risk of severe respiratory illnesses and other health problems. We have only seen this issue amplified as studies continue to link long-term exposure to fine particulate matter with an increased risk of death from the [COVID-19 pandemic](#).

The good news is that zero-emission cars and trucks are already becoming readily available in a wide variety of models and sizes. Recent analysis by the Union of Concerned Scientists has shown that in Maine in 2020, an average electric car reduces total lifetime emissions by [71 percent](#). Battery-electric trucks do not release tailpipe emissions, and when charged on the Northeast regional electric grid, they have around [66-87 percent](#) lower lifecycle global warming emissions compared to diesel trucks.

The urgency of the issue demands a strong response. For far too long, transportation pollution has been devastating the health of communities across the country. The solutions are here – and we urge the Maine Board of Environmental Protection to stand up to this moment and enact the strongest vehicle standards.

Thank you for taking public comment on this important topic.

Sincerely,

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