

## Breton, Mary B

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**From:** Paul Sheridan <sheridanpa@earthlink.net>  
**Sent:** Thursday, August 10, 2023 5:21 PM  
**To:** DEP Rule Comments  
**Cc:** Curry, Chip; Dodge, Jan  
**Subject:** Comments supporting Chapter 127-A and Chapter 128, Advanced Clean Cars/Trucks Programs

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Maine Dept of Environmental Protection

Comments RE:

Chapter 127-A, Advanced Clean Cars II Program

Chapter 128, Advanced Clean Trucks Program

I am writing in **SUPPORT** of these two rule changes to promote increased use of electric vehicles in as many ways as possible in Maine.

Despite the state's statutory goal of reducing emissions 45 percent below 1990 levels within the next decade and 80 percent in 2050, the state missed a 2021 rulemaking deadline and has failed to adopt policies on the largest contributor: *transportation*.

About half of Maine's greenhouse gas emissions come from the transportation sector, a share that has historically been far higher than the national average in part due to long commutes.

The administration has set an goal of having 219,000 electric vehicles registered in the state by 2030. The state had so far reached only about 4 percent of its goal, with roughly 9,500 electric vehicles.

The proposal rules here would require light-duty, zero-emission vehicles to make up 43 percent of sales for model year 2027 and make up 82 percent of sales in model year 2032.

By not adopting this rule in 2022, Maine has already missed the requirement for the 2026 model year, so the most important thing is we as a society get started. Otherwise, we're going to fall behind.

We should commit to a responsible, thoughtful approach to electric vehicles that will help Maine consumers and businesses save money, while reducing carbon emissions and protecting our economy and environment from the climate crisis.

Other petitions you may have received urge “...requiring Maine by 2028 to *review* progress...” That is simply “counting the deckchairs on the Titanic” as we miss goal after goal. “How far off goals are we this year?” Is it *too soon* to mandate change, **YET??**

People will still be able to buy used vehicles or drive the vehicles they already have, but we have to reduce emissions, and we have to do it quickly. Has not the earth in 2023 shown us that?

I would further add that the DEP should **ignore** those who say “we should not adopt rules from other states.” It seems to me that using California standards (CARB) is simply good science on the part of Maine regulators. We do not have to re-invent the wheel, here is a good, smart set of guidelines that we can follow to get us to our goal of cleaner air. Remember, if California were a country, it would be the 5th largest economy in the world! They have done the research already.

We should also be doing *as much as possible* to encourage the adoption of electric vehicles: ensure there are sufficient public charging stations along ALL state highways, and that these stations are monitored by the state for minimal maintenance, availability, and safety. Incentivize appropriate property owners to install. Conversion of existing fuel stations is the best approach.

Additional tax incentives for **used** vehicle (perhaps within a timeline of 5 years from manufacture, to ensure efficiency?) will help quicker adoption. The manufacturers of new vehicles are already committed to early electric adoption, so to those who say “the marketplace should lead the way, not regulations,” the answer is: the Market is LEADING, and Maine needs to follow! We need new cars NOW on the roads, so those who choose/can afford to upgrade every few years are adding to the supply of decent used vehicles, at substantially reduced prices. I need a good condition, used electric vehicle that I can purchase that is substantially below \$40,000.

We should ensure that our tech schools are **teaching training** for electric vehicle repair and maintenance. While a certain percentage of maintenance is the same for fossil fuel and electric vehicles (steering, shocks, brakes, etc.) a good percentage is all-new to the mechanics of Maine. If we do not want to see a shortage of qualified electric mechanics, nor a long list of unemployed ICE mechanics, we need to get these improvements going. What better way than to proclaim again the state's goal to: “Adopt now!”

Of course there are many other factors involved: electric grid resilience, power sourcing from renewables —as far as possible, new battery technologies forthcoming that replace lithium with safer and more abundant materials, recycling industries for batteries and associated electronics (also used in existing ICE and hybrid vehicles now), etc, etc.

**BUT:** the **sooner** we get started, the **sooner** we encourage—the **SOONER** we get the future we want!

Thank you all for the work you do.

cc: Senator Glenn Curry, Representative Jan Dodge, Governor Janet Mills

Paul Sheridan  
88 Hart Rd  
Northport, ME 04849-3419  
207-322-3961 Cell  
207-338-0350 Hm  
[sheridanpa@earthlink.net](mailto:sheridanpa@earthlink.net)

