

Breton, Mary B

From: Paul Curtis <pcurtis306@gmail.com>
Sent: Sunday, August 27, 2023 5:33 PM
To: DEP Rule Comments
Subject: Comment on 06-096 C.M.R. Chapter 127-A, Advanced Clean Cars II Program

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To whom it may concern,

Maine DEP should not adopt a rule establishing motor vehicle emission standards for new passenger cars, and light-duty truck, and medium-duty vehicles by incorporating the requirements of the California Advanced Clean Cars II regulations, beginning with the 2027 model year and continuing through the 2032 model year.

Requiring the sale of zero-emission vehicles (“EVs”), will adversely affect Mainers by creating standards more stringent than federally required, which will be a disadvantage to the people of Maine. At a time when inflation is at an all-time high, and wages stagnant, this body proposes making it more expensive to purchase a vehicle in Maine compared to consumers living elsewhere in the country. The proposed savings of \$7,900 over 10 years will be eclipsed by the additional cost of the EVs. EVs impose additional hidden cost - upgrades to the power grid, improvements to peoples’ homes for vehicle charging, and costly battery replacements, to name a few. Maine is a rural state where people may have to travel large distances with only limited charging infrastructure in place. This rule will force the adoption of EVs by consumers potentially decades ahead of the charging infrastructure needed to support these vehicles. Who will pay for the electrical generation and transmission infrastructure to support these EVs?

Under the estimated fiscal impact of the rule, it is stated, “While there are no direct costs to individuals as a result of these rules, vehicle manufacturers may choose to pass down costs to consumers.” This statement is disingenuous. Manufactures will most definitely pass on the additional cost of EVs to the end consumer including the cost of any required useful life and warranty provisions outlined in the proposed rule. Also, EVs will not be using traditional gasoline and diesel fuel. Has a study been performed on how the lower revenue from the gas and diesel taxes will affect the people of Maine? Will a tax be imposed on owners of EVs to offset the lost gas and diesel tax revenue?

But if this body disagrees, and imposes this burdensome and nonsensical rule, then this body must allow the fast-tracking of EV infrastructure to be permitted, even if it disturbs a vernal pool or wetland. It does the people of Maine no service to mandate EVs and to then hamper the improvement and deployment of the necessary electrical infrastructure upgrades potentially for years through an additional permit application and review process.

Sincerely,

