



Testimony in Support  
*Maine Advanced Clean Cars II rule*

Todd Martin  
Northeast Senior Program Manager  
National Parks Conservation Association

Chair Lessard, members of the Maine Board of Environmental Protection, Commissioner Loyzum, my name is Todd Martin. I live in Winslow and serve as the Northeast Senior Program Manager for the National Parks Conservation Association. NPCA was founded in 1919 to advocate for our nation's national parks, national monuments, and historic sites. In my role, I advocate for National Park Service sites here in Maine including Acadia National Park, Katahdin Woods and Waters National Monument, Roosevelt-Campobello International Park, St. Croix Island International Historic Park, and the Appalachian National Scenic Trail. On behalf of our 5,500 members and supporters in Maine and the millions of visitors to Maine's National Park sites annually, I am testifying in support of Maine adopting California's full Advanced Clean Cars II standard.

Air pollution is one of the most serious problems facing national parks. It threatens the health of park visitors, wildlife, and neighboring communities, drives the climate crisis and compromises views with hazy skies. In fact, 90 percent of our more than 400 national parks are plagued by haze pollution caused mostly by coal plants, vehicles, and other industrial sources, as well as oil and gas development and operations. The summit of Cadillac Mountain in Acadia National Park, one of the most popular destinations in the park, is often shrouded in haze, limiting the view and the visitor experience.

Acadia National Park, Roosevelt Campobello International Park, and Moosehorn National Wildlife Refuge are designated Class 1 clean air areas under the Clean Air Act, granting them additional protection from air pollution. But we are falling short in protecting the clean air in these special places.

According to the American Lung Association's 2023 State of the Air Report, Hancock County, where Acadia National Park is located, suffered five days of "orange" ozone days in 2022. At elevated ozone levels, children, healthy adults who exert themselves, and individuals suffering

from a respiratory disease such as asthma, bronchitis or COPD can experience reduced lung function and irritation. When this happens, individuals may notice a shortness of breath, coughing, throat irritation, and/or experience an uncomfortable sensation in their chest. With 3.9 million visitors to Acadia National Park in 2022, including youths, seniors, and adults with respiratory diseases, it is critical to limit air pollution in Maine including ozone, haze, and particle pollution. We must do better

Accelerating the adoption of electric light-duty vehicles here in Maine is one of the single biggest actions we can take to improve air quality and visibility for national park visitors. Maine's transportation sector produced half of statewide, fossil-fuel GHG emissions in 2022, or approximately eight million metric tons of carbon dioxide. Light-duty cars and trucks accounted for about 60% of total sector GHG emissions. Electric vehicles have no tailpipe emissions, and, given Maine's relatively clean electricity mix, have a much smaller carbon footprint than fossil-fuel-powered cars. That energy mix will continue to become less carbon intensive as Maine makes progress towards its 80% renewable energy mandate by 2030. More electric vehicles on the road in Maine will reduce air pollution, hazy views, and help Maine meet its climate change goals.

Maine has set ambitious yet achievable greenhouse gas emission reduction targets and electric vehicle adoption targets in statute thanks to the 2020 Maine Won't Wait Climate Action Report. Maine must reduce GHG emissions by 45% by 2030 and 80% by 2050 and achieve carbon neutrality by 2045. Furthermore, the report sets a goal of 219,000 light-duty electric vehicles on Maine roads by 2030. As of October 2022, there were approximately 8,500 electric vehicles registered in Maine.

According to Maine's Clean Transportation Roadmap published in December 2021, the most important regulatory driver in the electrification of Maine's light-duty vehicles in the next two decades will be through Advanced Clean Cars II (ACC II) standards. ACC II place the obligation on vehicle manufacturers, not consumers. Six other states, including Massachusetts, Vermont, and New York in our region, have already adopted these commonsense standards. Vehicle manufacturers typically have a three- to five-year planning horizon for setting up new supply chains and retooling factories for new models. It is imperative that Maine adopt the ACT II rule by the end of calendar year 2023 to impact model year 2027 vehicles.

Finally, we encourage the Department to go a step further than the proposed rule by adopting the full ACC II rule to get to 100% electric and zero emission vehicle sales in Maine by 2035, following the lead of the seven other states that have adopted these clean car standards. By limiting the program to 2032, we fear Maine will set a dangerous precedent and slippery slope as other states will begin to follow our lead. As Maine goes, so goes the nation.