

Dear Board of Environmental Protection,

Dear Board Members,

To address the state's largest source of transportation emissions, Maine must adopt the Advanced Clean Cars II (ACC II) program. This rule will provide Mainers with cleaner air and the ability to choose from a wider array of electric vehicles, all while saving families money at the pump. The rule also includes provisions that advance equity in the zero-emission vehicle transition and provide consumers certainty about the quality and durability of clean cars and trucks and their batteries.

We must adopt the proposed rule before the end of 2023 to ensure that Maine hits its own mandatory 2030 climate objective. In addition, to avail Mainers of the rule's full suite of climate, health, and economic benefits while enhancing certainty for Maine's people, businesses, utilities, and regulators, we urge you to go further than the proposal which stops short of its full potential by running only through 2032. The rule should continue ramping up zero-emission vehicle requirements, culminating with a 100% requirement for 2035 and beyond. The state is ready for ACC II, and we cannot afford to delay implementation of this crucial standard.

At the same time, Maine's trucking industry is a leading source of unhealthy air pollution and also has an outsized climate impact. Medium- and heavy-duty (MHD) trucks that support the shipping, freight, and delivery industries are a major source of harmful smog-forming pollution (Nitrous Oxide), particulate matter (PM 2.5), and air toxics. These emissions disproportionately impact low-income communities and communities of color often located near major trucking corridors, ports, and distribution hubs. Adopting the Advanced Clean Truck (ACT) rule will save lives, especially those of our most vulnerable populations, while also creating high quality green jobs.

Additionally, the medium and heavy duty vehicle sector accounts for 27% of Maine's transportation emissions. If Maine is going to turn the tide on climate change and vehicular air pollution, we must begin replacing our dirtiest trucks and buses as soon as possible. Adopting the ACT rule creates market certainty and allows Maine to access the at least 70 electric truck and bus models that are currently available.

Maine also needs to adopt the Heavy Duty Omnibus rule and Phase 2 Greenhouse Gas standards. The Omnibus rule will cut NOx emissions from heavy-duty trucks by roughly 75% below current standards beginning in 2024 and 90% in 2027. In addition to cleaning up NOx, the Omnibus rule looks to institutionalize PM pollution controls and prevent backsliding by adopting a more stringent standard that aligns with current industry certifications. These reductions add up to \$36 billion in statewide health benefits from 3,900 avoided premature deaths and 3,150 hospitalizations from 2022 to 2050. Phase 2 standards for medium- and heavy-duty vehicles through model year 2027 will improve fuel efficiency and cut carbon pollution to reduce the impacts of climate change, while bolstering energy security and spurring manufacturing innovation.

Finally, we strongly urge Maine to adopt complementary MHDV emission standards, including the Innovative Clean Transit rule, which would require public transit agencies in the state to gradually transition their fleets to zero emissions buses, with the goal of having all operating buses on the road be zero-emission by 2040. Further, the state should adopt the large entity reporting requirement component of the ACT rule and set the reporting threshold at an appropriate level for Maine. The state should also move expeditiously toward adoption and implementation of California's Advanced Clean Fleets rules as soon as those are finalized.

Maine communities need and deserve equitable access to clean air. And our markets need certainty to adopt EVs. Please adopt these standards now!

Sincerely,