



Anne M. Carney  
Senator, District 29

THE MAINE SENATE

3 State House Station  
Augusta, Maine 04333

August 28, 2023

Board of Environmental Protection  
17 State House Station  
Augusta, ME 04333-0017

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

Dear Board of Environmental Protection,

Please accept these comments related to the Chapter 127-A and 128 rulemaking. My comments are in support of adopting the proposed regulations, though I believe adopting the full requirements of the California ACC II regulations is necessary to slow climate change and to ensure that Maine consumers receive the same benefits as our New England neighbors and other states that set a clear path to a goal of 100 percent of new vehicle sales by 2035.

In December 2022, my family purchased a zero emission vehicle (ZEV) for environmental reasons. David and I have three adult kids and two grandchildren on the way – we want to do everything we can to reduce carbon emissions and slow climate change. As an environmentalist and lawmaker, I'm acutely aware that Maine's transportation sector produces more than half of statewide, fossil-fuel GHG emissions, and a significant portion of this is due to light-duty cars and trucks. Maine's [Clean Transportation Roadmap](#) identifies electric vehicles as the most important and readily available option for reducing GHG emissions. When we purchased our ZEV, we also joined a community solar project so that our home and ZEV net zero.

[Senator Collins](#) recently reiterated Maine's status as the "tailpipe of the nation" in her statement supporting the Comprehensive National Mercury Monitoring Act:

“Maine has been called the ‘tailpipe of the nation,’ as the winds carry pollution, including mercury, from the west into Maine.” I urge the Board to adopt the full ACC II rule and the ACT rule so that Maine can work with our New England neighbors to reduce emissions that are generated in our region.

When we purchased our Ford Mach E last year, I had concerns about experiencing ‘range anxiety,’ limiting my travel or having to wait for my vehicle to charge, but none of this has happened. Instead, I've been amazed by the convenience and fun of owning a ZEV.

Until I started driving a ZEV, I never realized how much time I spent comparing gas prices and worrying about whether I needed to stop to fill my tank on the way to the State House or could wait for my drive home. Now, I charge my car overnight and really appreciate the time savings and convenience. When the battery is 90% charged I easily make it to work and home even on the coldest days. The weight of the battery gives my car great traction in snowy weather. I can spend a week in Augusta without needing to recharge.

The safety features and navigation technology typical of ZEVs make the car easy to drive regardless of the traffic conditions and potential need to take a detour. I've put a lot of miles on the vehicle in the last 10 months, and the only service has been changing the snow tires. There is also something incredibly fun about driving a ZEV. David and I always choose the Mach E when we run errands or take longer trips. Our kids and friends love to drive it, too.

I feel strongly that, in addition to the environmental benefits, Maine must adopt the full ACC II rule so Maine consumers have the same market benefits and access to ZEVs as our New England neighbors. Massachusetts, Vermont, Rhode Island and Connecticut have adopted or are in the process of adopting ACC II. ACC II imposes requirements on car manufacturers, not on dealers or customers, to increase their sale of ZEVs. Full adoption of ACC II to bring sales to 100% of new vehicles by 2035 would put Maine on a level playing field in our region.

Adopting these rules would help bring down the price of ZEV's and increase the availability of electric vehicles on the market. The cost of a new ZEV is expected to be on par with gas-powered vehicles soon, for many reasons including improvements in the manufacturing processes. A recent New York Times article noted: “Auto executives say they are finding it is [easier and cheaper to design and build new electric models](#) than gasoline-powered ones.” In addition, studies show that owners of ZEVs [spend less on operating and maintenance](#), and that has

certainly been my experience. The 2022 Consumer Reports study found “EV owners could save between \$1,800 and \$2,600 in operating and maintenance costs for every 15,000 miles they drive ... compared to drivers of gas-powered vehicles.” Id.

Maine’s Clean Transportation Roadmap recommends implementation of ACC II and ACT as “the most critically important in terms of impact on GHG emissions. Assuming they are adopted and remain unchanged in the future, these two programs together can lead to large reductions in transportation sector GHG emissions.” Ibid., pg. 52. Nationally and here in Maine this will send a consistent signal to automakers to increase deliveries of ZEVs. It will accomplish two urgent goals. It will give Maine customers more choices to purchase the ZEV that saves them money and meets their needs. It will reduce transportation emissions nationally, regionally and here in Maine, so we’ll no longer be the “tailpipe of the nation.”

Thank you once again for your work to reduce vehicle emissions, and for considering adoption of the Advanced Clean Cars II and Advanced Clean Trucks regulations.

Sincerely,

Anne Carney  
Senate District 29