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August 28, 2023

Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333-0017
Email: rulecomments.dep@maine.gov

RE: Comment on Chapter 127-A: Advanced Clean Cars II Program

On behalf of The Union of Concerned Scientists (UCS) and our over 3,200 supporters, activists, and Science Network members in Maine, we urge the Board of Environmental Protection (BEP) to fully adopt the Advanced Clean Cars II (ACCII) standards to 2035. The ACCII standards are one of the most important air and climate pollution regulations to be considered by the state.

Adoption of the ACCII standard is an important step towards cleaner air and lower climate changing emissions in Maine. The transportation sector is the largest source of greenhouse gas emissions in the state (49% in 2019)[1], 60% of which comes from light-duty cars and trucks.[2] In order to meet the state's ambitious climate goals of a 80% reduction from 1990 levels by 2050, adopting the full ACCII proposal up to 100% of new zero emission vehicle sales by 2035 is necessary.

There are drastic benefits of electric vehicles (including plug-in hybrids) compared to gasoline fueled ones and conventional hybrids. Especially in the many rural areas of Maine who drive their vehicles many more miles—on average a rural EV driver saved $552 in 2018 by switching from gasoline to electricity.[3] Coupled with significant federal funding for vehicles and charging infrastructure from the Inflation Reduction Act[4], as well as Maine state incentives[5], these vehicles stand to bring major financial benefits to Maine. Additionally, according to a UCS analysis we conducted last year called Driving Cleaner, which took into account the full vehicle life-cycle as well as different electricity grid composition across the country, an average EV in Maine runs at 111 miles per gallon, with an average US hybrid at 51 mpg and average gasoline vehicle at 25 mpg. As the grid gets cleaner, these vehicles will become even more efficient.[6]

The ACCII standard will also address the steadily increasing demand for electric vehicles. Looking at the recent 90% increase in EV sales in 2019[7], it is clear that there is the demand for more availability of electric vehicles in the state. This rule would do just that—by putting Maine on a steady, gradual, predictable timeline and require manufacturers to ensure that these vehicles are increasingly available.

[1] https://www.maine.gov/climateplan/sites/maine.gov.climateplan/files/inline-files/9th_GHG_Report_FINAL%20%282%29.pdf
[2] https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/Maine%20Clean%20Transportation%20Roadmap.pdf
[3] https://www.ucsusa.org/sites/default/files/attach/2019/05/State%2520Benefits%2520of%2520EVs_batch%25202_ME.pdf
[4] https://electrificationcoalition.org/work/federal-ev-policy/inflation-reduction-act/
[5] https://www.efficiencymaine.com/electric-vehicle-rebates/
[6] https://www.ucsusa.org/resources/driving-cleaner
[7] https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/Maine%20Clean%20Transportation%20Roadmap.pdf

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There are also significant flexibility through the compliance credits that attain the same goals while giving manufacturers more routes towards meeting the sales requirements. Adopting the full rule to 2035 would allow for the longer term planning necessary for the transition, including utility planning for charging and grid infrastructure investments.

Sincerely,

Roger Stephenson
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