

Jonathan Wilcox  
Paris  
LD 2261

LD2261, An Act Designating New Motor Vehicle Emissions Rules as Major Substantive Rules

Dear Chair Senator Stacy Brenner, Representative Lori Gramlich and members of the Environmental and Natural Resources Committee;

I'm a resident of Paris and I urge you to vote: ought not to pass.

Bill LD2261 would hold Maine back, slowing progress on climate action and giving Mainers fewer choices, all the while continuing to cause breathing issues for Mainers by inhaling soot and toxins from tailpipe exhaust (proven links, by both the National Institutes of Health and the federal Environmental Protection Agency, to-- heart and lung disease, premature deaths, and asthma in kids, Note1 below). I personally have experienced the disgusting act of pickup trucks "rolling coal" along the sidewalks in Norway, Maine every year for the past 10 years.

This bill would also contribute to slowing the transition to the most efficient form of transportation, based on the perspective of input energy to output function, (electric drive systems have the least conversion losses from energy capture onward). LD 2261 is a last-minute bill to undermine the progress to Clean Car Standards, I urge you to vote against it.

Approving it will undermine a year-long participatory process--carefully considering one of Maine's most important climate (and consumer choice) policies. For more than 20 years, Maine has followed a nonpartisan process through the Board of Environmental Protection (BEP) to adopt stronger emissions standards because we all value clean air and people's health.

The intent of this bill is clear: Singling out the Clean Cars Standards currently being considered by the BEP. The year-long, thoughtful public health and environmental policy-making process currently underway has already incorporated input and comments from thousands of Mainers, including many legislators. This is an example of bad policy rule-making.

The timing is not an accident. This last-minute bill, based on misinformation about what the Clean Car Standards do, is intended to predetermine the outcome of BEP's rational process. We should be vigilant to identify misinformation, which does not serve anyone's best interest.

The impacts of climate change are impacting local communities now (floods, shortened ski season, coastal damage, more intense storms, and drought conditions) and the last thing we need to do is delay progress in addressing climate change, rather, to me, we are in a climate crisis. Also, delay would contribute to other countries getting ahead of USA. Do you really want China to get ahead of USA?

Using business terms, "opportunity cost" is one we all should be aware of. Slowing the adoption of zero emission cars and trucks will hurt Maine people – ensuring new, less costly EV models go to other states first, leaving us with what's left over: Dirtier and more expensive gas cars that take more time away from driving by requiring more time in the repair shop because mechanical engines have increased failures due to more parts and are just not as reliable as electrical motors.

Electric vehicles cost less to fuel and maintain. One analysis estimated Maine would see \$16.9 billion in benefits from adopting this rule by 2050, mostly from drivers not having to pay high gas prices, Note2 below).

As you should already be aware, "Maine's Clean Transportation Roadmap" (Note3 below), developed in 2021 to evaluate all of our policy options to reduce emissions from cars and trucks, listed these standards as the number one recommendation. Transportation accounts for nearly half (49%) of Maine's annual greenhouse gas emissions, more than any other sector. Clean Cars Standards are the best option to

get more EVs on the road in Maine and to successfully address climate change as a state.

Adopting Clean Car Standards is a win-win-win (for better health of people, planet and economy). Adopting Clean Car Standards, and rejecting LD 2261, will ensure that Maine drivers and the businesses that want them can access the range of costs, models, and uses as they need. Already, 13 other states have adopted this standard. It's a smart direction to move toward. If Maine doesn't act, manufacturers will prioritize EV sales in those states, leaving Maine people out of the transition, causing increased costs, (fuel/attending to repairs) and keep Maine's residents to a lower standard of living. Under federal law, Maine can choose one of two emissions standards: the weaker federal standard, or higher standards available to some states under Section 177 (Note4 below).

Maine has chosen higher standards for efficiency and health since 2001. Now is not the time to go backwards. The Legislature authorized the BEP to adopt stronger standards three decades ago, and Maine has chosen higher standards for efficiency and health for years through routine technical rule-making like that currently underway.

The Clean Cars Standards are a reasonable and affordable approach to the EV transition. The standards phase in gradually, starting with model-year 2028, allowing time for carmakers to ramp up production. Clean Cars Standards only apply to big carmakers to supply more EVs to Maine over time. There are no requirements for any person or business to buy any particular vehicle. Also, Clean Cars Standards only apply to new car sales.

Kelly Blue Book states the cost of electric vehicles is dropping "all the time" (Note5 below), a trend backed by tens of billions of dollars in public and private investments in EV production spurred by the Inflation Reduction Act.

EVs are already cheaper to fuel and own – analysts expect EVs will be cheaper than gas vehicles up front in just a few years.

Again, I urge you to vote against LD2261, thank you for your consideration.

Jonathan Wilcox  
Paris, Maine

Note1:

Environmental Protection Agency:

<https://www.epa.gov/mobile-source-pollution/research-health-effects-exposure-risk-mobile-source-pollution>

National Institutes of Health:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5559575/>  
and

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2673207/>

Note2:

<https://www.maine.gov/dep/ftp/rulemaking/127A/public-comment/Support/Conservation%20Law%20Foundation%20comment%20in%20support%20of%20127-A.pdf>

Note3:

<https://www.maine.gov/future/initiatives/climate/cleantransportation>

Note4:

<https://www.transportpolicy.net/standard/us-section-177-states/>

Note5:

<https://mediaroom.kbb.com/2023-10-11-New-Vehicle-Transaction-Prices-Drop-Further-in-September,-Led-by-Price-Cuts-at-Tesla,-According-to-Kelley-Blue-Book-Report>