



Committee on Environment & Natural Resources  
% Legislative Information Office  
100 State House Station  
Augusta, ME 04333

January 27, 2025

**RE: LD 495, An Act to Require Rules Designed to Reduce Climate Change to Include Estimates of the Reduction in Adverse Climate Effects and of the Cost to Consumers**

Dear Sen. Tepler, Rep. Doudera, and Members of the ENR Committee:

My name is Ania Wright and I am Maine Audubon's Policy Advocate. Maine Audubon is a wildlife conservation non-profit – we fulfill our mission to “conserve Maine wildlife and wildlife habitat” by engaging people of all ages in nature through a science-based approach to education, conservation, and advocacy. On behalf of Maine Audubon and our 30,000 members, supporters, and volunteers, thank you for the opportunity to submit testimony in opposition to LD 495, *An Act to Require Rules Designed to Reduce Climate Change to Include Estimates of the Reduction in Adverse Climate Effects and of the Cost to Consumers*.

Maine Audubon is supportive broadly of initiatives that help policymakers to create informed decisions on climate change impacts, but we do not believe the LD 495 will achieve this in a balanced way. The bill requires an estimate of the costs associated with reduction in greenhouse gas emissions, but does not account for the full scope of benefits.

We know that addressing the climate crisis will cost money. Reaching our climate and clean energy goals will require investment in all sectors, from transportation to energy to agriculture. Without accounting for the full cost-benefit analysis of a policy, which this bill would negate to do, we will be ignoring both the potential long term savings and avoided costs that a policy will achieve. In the ‘Cost of Doing Nothing’ analysis, for example, completed by Eastern Research Group (ERG) and the Governor’s Office of Policy, Innovation, and the Future (GOPIF) in 2020, it is projected that the state economy could incur a 15% loss by 2050 if the state does not adapt to the climate crisis<sup>1</sup>. Failing to include a full analysis of costs and benefits of a policy increases our risk of realizing these losses in the long term.

---

<sup>1</sup> ERG & GOPIF, Assessing the Impacts Climate Change May Have on the State’s Economy, Revenues, and Investment Decisions: Volume 2: Cost of Doing Nothing Analysis Final:  
[https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/ERG\\_MCC\\_Vol2\\_CostOfDoingNothing\\_9-1-2020.pdf](https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/ERG_MCC_Vol2_CostOfDoingNothing_9-1-2020.pdf)

Furthermore, agency staff are already tasked with providing estimation of the fiscal impact of rules under MRS Title 5, §8057-A - 'Preparation of Rules' under the Administrative Procedures Act. This proposal therefore narrows the scope of analysis that is already being provided by agencies, and does not allow for full review of a proposal.

In order to provide agencies with the full scope of information needed to make decisions in the best interest of all Mainers, we encourage you to vote 'ought not to pass' on LD 495.

Sincerely,

Ania Wright  
Policy Advocate