

Townsend, Erle

From: Thomas Bradley <thomas.1884@yahoo.com>
Sent: Wednesday, January 31, 2024 8:40 AM
To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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I am commenting as an individual Maine resident without association with any entity or office, but with a concern about the impact of climate change and how public policy responds.

Respectfully, the proposed rule Chapter 127-A, while well-intentioned, is premature and overly aggressive. Electric vehicles, i.e., zero-emission vehicles, are still an early technology and are severely challenged by extreme cold temperatures which occur with regularity in Maine winters. The New York Times and the Portland Press Herald have reported on issues with operating electric vehicles in cold weather, and the BEP independently can verify these issues. At this time, electric vehicles unfortunately are not practical for widespread use in Maine, which is reflected by electric vehicles' share in the current Maine market.

Certainly their adoption is growing, but imposing at this time a minimum adoption starting two years from now is not appropriate without more certainty in the timing of technological improvements.

For good reason, this proposed minimums also lack public support and in fact will generate public opposition. That has implications beyond the impact of the rule itself. Adoption will alienate the public toward the steps that need to be taken going forward toward electric vehicles and other environmental issues, and such alienation also will have a political impact, producing a reaction to public policies beyond and entirely unrelated to the zero-emissions goal and environmental concerns.

It is better public policy to not adopt Chapter 127-A at this time and to permit the issue to be reconsidered in 12 or 24 months, when technological improvements to zero-emission vehicles are more certainly on the horizon.

Thank you.
Thomas C. Bradley
122 Starbird Road
Portland ME 04102
207 807 5315

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