



Natural Resources Council of Maine

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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

**To the Committee on Environment and Natural Resources
by Sarah Nichols, NRCM
February 24, 2025**

Senator Tepler, Representative Doudera, and distinguished members of the Committee on Environment and Natural Resources, my name is Sarah Nichols, and I am here on behalf of the Natural Resources Council of Maine (NRCM) today to oppose LD 495 primarily because it ignores the wide range of benefits of initiatives that reduce greenhouse gas emissions; but also because it creates unnecessary work and additional costs for the Department of Environmental Protection (DEP) – and ultimately Maine’s taxpayers.

NRCM is supportive of the notion that decision-makers use a cost-benefit analysis approach to determine if state-level initiatives are good public policy. However, LD 495 seems to purposefully leave out a full description of the “benefits” part of the analysis. We believe that this bill highlights a key reason why a lot of climate-friendly initiatives receive opposition – they are solely focused on immediate costs and not the bigger picture. They also ignore the enormous “costs of doing nothing” about the carbon pollution that causes climate change, which we know increase exponentially with inaction over time thanks to research by the Maine Climate Council.¹ If we evaluate policies based on cost without considering the full range of benefits they provide, or based on cost relative to a “do nothing” scenario, we are setting ourselves up for bad analysis, bad results, and ultimately failure to effectively protect Maine’s environment.

NRCM is also supportive of greenhouse gas analysis more broadly, and particularly for new projects and initiatives. The Maine DEP already does extensive emissions accounting and inventory and performs emissions analysis for GHG rulemakings, in addition to economic impact analyses. This legislation unfortunately does not seek to contribute additional

¹ *Cost of Doing Nothing Analysis*, Maine Climate Council.
<https://www.maine.gov/future/initiatives/climate/climate-council/reports>

understanding of the impact of new rules and projects but seems to be aimed at casting doubt on rules that would benefit Maine's climate.

We don't evaluate public health initiatives solely by their price tag—we also consider how many lives they save and the medical costs they prevent. We don't assess infrastructure projects only by their expense—we look at the economic growth they generate and the safety improvements they bring. So why would we look at initiatives that reduce greenhouse gas emissions only through the lens of what they cost, without acknowledging how they strengthen our economy, improve public health, lower long-term energy expenses, and make our communities more resilient?

Many policies that effectively reduce greenhouse gas emissions are overwhelmingly good for Maine, even if climate change weren't a concern. Consider:

- Energy efficiency upgrades lower electricity bills and reduce demand on the grid, saving households and businesses money.
- Clean energy investments bring stable, good-paying jobs to Maine and reduce reliance on volatile fossil fuel markets.
- Public transit expansion and electric vehicle adoption reduces traffic congestion and makes transportation more affordable.
- Heat pumps and building electrification cut energy costs, improve indoor air quality, and reduce dependence on expensive heating oil from out of state.
- Recycling and circular economy policies lower waste management costs for municipalities and taxpayers and create new business opportunities.

If we are serious about building a Maine that is economically strong, resilient, and competitive in the 21st Century, we need policies that consider the full picture—not just cherry-picked cost estimates that ignore long-term savings and widespread benefits. I urge you to swiftly reject LD 495 and instead focus on policies that lower costs, create jobs, and build a healthier, more prosperous future for all of us.