

November 12, 2021

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VIA Email: rulecomments.dep@maine.gov

RE: 06-096 Chapter 128, Advanced Clean Trucks Program

Acadia Center respectfully submits the following comments in strong support of the Department of Environmental Quality (DEP) Rulemaking, *06-096 Chapter 128, Advanced Clean Trucks Program (ACT)*. The DEP is proposing to adopt California's Advanced Clean Trucks Rule (ACT) "to accelerate sales of zero-emission medium- and heavy-duty vehicles and reduce greenhouse gas emissions and criteria air pollutants from on-road mobile sources in Maine," ensuring that truck manufacturers offer affordable zero-emission vehicle choices to Maine fleets.

[Acadia Center](#) is a non-profit, research and advocacy organization incorporated in Maine and committed to advancing the clean energy future by offering real-world solutions to the climate crisis. Acadia Center tackles complex problems, identifies clear recommendations for reforms, and advocates to create significant change that supports a low-carbon economy across the Northeast which can then be a model for application elsewhere. Acadia Center identifies regional, state, and local improvements that will dramatically reduce carbon pollution and improve quality of life throughout the Northeastern United States.

Maine is nearly 100 percent dependent on petroleum to fuel rail, truck, bus, aerospace, marine, and automobile transportation vehicles. Transportation accounts for more than half of the State's energy use, emissions, and costs. Transportation is responsible for 54 percent of Maine's annual greenhouse gas emissions. When emissions are analyzed by vehicle type, 59 percent of Maine's transportation-related emissions are from light-duty passenger cars and trucks; 27 percent are from medium- and heavy-duty trucks; and the remaining 14 percent come from rail, marine, aviation, and utility equipment vehicles. Gasoline and diesel fuel prices can be extremely volatile due to global, national, and regional constraints. Maine is a relatively rural state, necessitating widespread travel within a limited transportation infrastructure base. In a planned economy-wide transition to electrified transportation, electric vehicles (EVs) for all vehicle types must be supported and incentivized with appropriate regulations that promote the manufacture and operation of EVs.

The Maine Climate Action Plan sets targets and goals to reduce emissions and transition to clean energy and transportation in the fast-approaching decades. Putting in place goals and targets for climate action is only a first step, as the actualization of those goals rest largely on effective regulatory and implementation strategies and actions that follow. The proposed Chapter 128 rule advances the Climate Action Plan's recommendation, "By 2022, create policies, incentives, and pilot programs to encourage the adoption of electric, hybrid, and alternative-fuel medium- and heavy-duty vehicles, public transportation, school buses, and ferries."

The proposed rule is the first step to reduce carbon pollution from medium- and heavy-duty trucks in Maine, and an additional step to reductions in ozone, fine particulate matter (PM_{2.5}), and toxic diesel particulate matter. Nearly 100 percent of the medium- and heavy-duty trucks in Maine are fossil-fuel driven and continued exposure to their pollution will lead to premature death and serious health problems for Maine citizens. The International Council on

Clean Transportation (ICCT) found that the ACT rule could reduce medium- to heavy-duty vehicle emission by 13 percent, PM emissions by 10 percent, and carbon dioxide emissions by 18 percent by 2050.

California is implementing the ACT rule and it is being adopted in other states, including New Jersey, New York, Oregon, and Washington. Maine's zero-emission-vehicles rules have been based on California regulations for decades and this adoption does not deviate from that trend. Maine is also a member of a group of fifteen states and the District of Columbia that signed a Memorandum of Understanding in 2020 to adopt market-enabling mechanisms and to consider regulatory approaches to spur the market for zero emission medium- and heavy-duty vehicles.¹ Adoption of the ACT rule will demonstrate Maine's commitment to reducing emissions in this sector.

While zero-emission trucks may have higher upfront costs, they have lower operating costs than conventional trucks. As technology advances, more manufacturers will build zero-emission truck for more applications and at less maintenance costs over the vehicles' lifetimes.

To avoid missing compliance years and delaying the rule's benefits, it is imperative that Maine adopt the ACT rule this year. Thank you for your work in developing this key transportation emissions rulemaking and please consider Acadia Center as a resource as you finalize the rule. We strongly support adoption of the ACT in 2021 to help Maine achieve its statutory climate targets while reducing health-harming air pollution and making significant progress toward a clean energy economy.

Respectfully Submitted,

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¹ Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Memorandum of Understanding." 2020, July 14, 2020. <https://www.nescaum.org/documents/multistate-truck-zev-governors-mou-20200714.pdf>.