



PO Box 202
Waterville, ME 04903
(207) 209-3944
info@maineambulance.org

Comments on Proposed Chapter 127-A, Advanced Clean Cars II Program and Chapter 128, Advanced Clean Truck Program

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The Maine Ambulance Association (MAA) is a non-profit trade association committed to improving and supporting Maine's Emergency Medical System (EMS). Our members include emergency medical services of all sizes and corporate structures, from every corner of the state. For over 35 years we have worked to provide vision, leadership, and advocacy for the Maine EMS system and to provide a unified voice to represent and support the broad interest and common positions of ALL Maine EMS providers.

We would like to express our thoughts concerning the application of these proposed rules on vehicles used for EMS. Our EMS vehicles need to be on call and ready to respond at all times, and EMS providers do not normally have backup vehicles readily available. So we are concerned that the limitations on charging and operating EV cars and trucks would impede the operations of emergency services in Maine, or require additional vehicles at high cost. The proposed rules would reduce the availability of cars and trucks that can be used for EMS, make them more expensive to obtain, or require more vehicles to provide the same level of EMS service.

Advanced Clean Cars II Rule

The Definition of Emergency Vehicle in Section 2.H acknowledges the operating limits of EV cars for EMS providers and excludes them from the rule. However, the definition is limited to "publicly owned" vehicles. Numerous communities across our state have EMS services provided by non-publicly owned entities. The proposed definition would not grant the exemption to Non-Profit, Hospital, or Privately owned ambulance services. All of these non-public EMS providers have the same responsibility to act, respond, and function as publicly owned ambulance services, so they should be treated the same way in the proposed rule. We propose the following modification to the definition:

Emergency vehicle. "Emergency vehicle" means any authorized vehicle ~~publicly owned and operated~~ that is used by a peace officer, used for fighting fires or responding to emergency fire calls, used by emergency medical technicians or paramedics, used for towing or servicing other vehicles, used for repairing damaged lighting or electrical equipment.

Advanced Clean Trucks Rule

The proposed rule would apply to EMS trucks with GVWR over 8500 pounds. Again, the proposed requirement to supply increasing levels of EV Trucks presents significant operational challenges for EMS providers that would either impair service or increase the cost of providing the same service. We

therefore request that an exemption be made for EMS vehicles that is the same as the revised exemption in the proposed Advanced Clean Car II Rule described above.

We extend our sincere appreciation for your attention to this pressing matter and for your steadfast support of Maine's Ambulance Services across the board. Your collaboration is invaluable in ensuring the optimal functioning of our EMS system.

A handwritten signature in blue ink, appearing to read 'R. Russell', with a stylized flourish at the end.

Robert Russell, President
Maine Ambulance Association
rrussell@nemhs.com
207-318-2323