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To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program

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I feel the need to comment on this proposed rule because it is completely unnecessary, and erodes away Maine's tradition of independence when it comes to establishing policy that works for our state. First and foremost, California's problems are not Maine's problems. California has an air quality problem; Maine does not. California is an arrogant, far left progressive state that assumes that whatever laws it enacts will automatically be mimicked by the other 49 states. Now, Maine wants to play "follow the leader?" Federal vehicle emission standards are satisfactory for a clean-air state such as Maine, and adopting a radical set of standards is simply not needed given that our transportation future is in all likelihood, electric.

As far as electrification is concerned, California is also very radical on this front. Electric vehicles are being forced into the faces of the public, who are not at all enthused at the prospect. Currently, the fast charging infrastructure is sparse in higher populated areas, and non-existent in the rural communities of this state. Secondly, the adequacy of the existing power grid to handle the rapid adoption of electric vehicles is either unknown or insufficient. The difficulties in launching the construction of offshore wind farms is not providing any optimism that we will have a grid that can handle the demands of future electric transportation. It would be best for Maine to slow down the transition push, and allow radical California to be the "guinea pig" in regards to a rapid transition to observe how it works out for them. I would like to see a much slower transition, say over a period of 25 to 30 years, by which time all private passenger vehicles sold in the state will be electric, through normal voluntary consumer demand and natural market forces, and not government mandate.

I am currently employed as a truck driver for a Bangor-based regional haul company. Based on my experience operating a tractor-trailer, electrification will not work in the type of vehicle that I operate. To have an electric tractor would incur a heavier weight, (from the battery pack), thus reducing the amount I can haul in a single load, needing to stay under 80,000 pounds. Another real problem would be the need to charge the battery. In the course of a week, I may only be able to park at a truck stop once. For my required 10-hour rest breaks for the other days of the week, I may have to stop at a travel plaza, rest stop, company drop yard, or behind the building of a customer. These other locations do not or would not have charging equipment to replenish the battery in the truck, preventing from charging daily. With diesel, I have a 1,200 mile range, and often need to refuel every 2-3 days, and requiring up to 12 minutes to do so. Electrification is simply not practical for semi-local, regional, over the road, and long haul operations. The only exception is local haul trucks that don't see more than 400 miles in a day, and return to the terminal at the end of the work day where they could charge overnight. Even then, local trucks would still be limited in how much cargo they can haul due to the weight of battery pack on the tractor.

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