



Lynne Cayting, Chief, Mobile Sources Section
Bureau of Air Quality
Maine Department of Environmental Protection
17 State House Station Augusta, ME 04333

August 27, 2023

Rulemaking Comments for Chapter 128, Advanced Clean Trucks Program

Dear Ms. Cayting:

Public Works Departments across the state believe in the incorporation of green technologies as they are developed, however we have great concern how the proposed Chapter 128 Rules would impact public works departments.

Our departments have large road network systems they must maintain with a variety of different vehicles, including large, medium, and small trucks, that are required to plow during snow events that routinely last in excess of 24 hours and longer. Public Works Departments are required to drive long distances where there is no charging infrastructure and there will likely never be any due to the rural locations. Even where there is charging infrastructure, stopping for long charging periods, especially during snow events, would place the general public at risk since it would impact roadway conditions, in turn impacting emergency vehicle response. In addition, these winter events are occurring in extreme cold weather which has been reported to reduce expected battery output by up to 40% or more. Many commercial truck uses, such as dump bodies, snow plows, and sand/salt spreading equipment will require an additional power source or will significantly reduce the ZEV range.

There are also a number of practical concerns that we think have not been fully considered including ZEV availability, servicing equipment upgrades, finding/training technicians to maintain and repair them. These are all problematic.

The additional cost of ZEV would put significant strain on public works department budgets, many of which are already underfunded. In addition to the higher costs of ZEV vehicles, some departments may need to increase their fleet size in order to maintain service levels when other vehicles are charging.

Public works maintenance vehicles are not a good fit for ZEV vehicles currently on the market and do not present enough of a market for other fuel technologies to actively meet a 2027 deadline for replacement, therefore we would like to request a Public Works exemptions be included in any new ZEV rules.

Sincerely,

Maine Chapter of American Public Works Association

Ralph Norwood
President

Public Works in the Public Interest
Home Page: maine.apwa.net

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