

## Breton, Mary B

---

**From:** Scott Welch <SWelch@hartt-trans.com>  
**Sent:** Friday, August 25, 2023 1:10 PM  
**To:** DEP Rule Comments  
**Cc:** Scott Welch  
**Subject:** Opposition to the Routine Technical changes proposed in Chapter 128: Advanced Clean Truck Program

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

To the Board:

My name is Scott Welch and I am a resident of Veazie, Maine. I work as a Directory for Bison Transport USA out of the Bangor terminal. I have worked for Bison for five years and take pride in the company's commitment to efficient and environmentally friendly operations in Maine which span over 60 years. I am writing to express my opposition to the Routine Technical changes proposed in Chapter 128: Advanced Clean Truck Program.

Please consider the following related to my opposition:

- Bison USA is certified as a Smartway Transport Partner, recognizing the company meets or exceeds all environmental standards for the commercial vehicle industry.
- Needed infrastructure for Commercial EV operations is not in place. Current efforts to expand and update electrical infrastructure has been delayed by numerous court actions.
- Similar opposition and hurdles to future infrastructure upgrades will continue to present significant challenges and delays to attempts at system improvements.
- Our maintenance facilities would require major upgrades to the current electrical systems, including installation of 3 Phase power. Those costs would negatively impact the company and its employees.
- Our maintenance technicians would require substantive technical and safety training to work on high voltage vehicles.
- Very few, mostly urban areas, have the electrical capacity in place to adequately handle the load needed to power a 1 megawatt charging station needed for Commercial EVs.
- The power required to fully recharge (10 hours) one Commercial EV is the same power required for 2,600 average households for that same 10-hour period.
- The increased weight of a Commercial EV means less freight would be able to be hauled each load, or weight limits on Maine's already failing road systems would need to be increased well beyond 100,00 lbs.
- The cold climate of the Northeast will negatively impact every aspect of the Commercial EV including increased charge times and accelerated depletion of battery energy,
- Increased costs will undoubtedly be passed on to the end consumer for businesses to survive.

While I fully support efforts to improve and protect our environment, the timeline associated with the mandates contained within Chapter 128 are simply too aggressive to succeed. Maine should

not limit its commercial vehicle future to electric vehicles, as other technologies are already beginning to evolve. The future of all vehicles will certainly include those powered by electric batteries, however forcing and limiting ALL vehicles to electric in the timeline proposed in Chapter 128 is unrealistic, unattainable, bad for business, and bad for Maine. Please allow a natural, gradual progression to the vehicles of the future as science, technology and infrastructure allow by rejecting the proposals contained in Chapter 128.

Thank you in advance for your consideration.

Best Regards,  
Scott



**Scott A. Welch, MBA, SHRM-SCP**

Director of Human Resources, Eastern Division

(O) (207) 992-5906

(C) 207-249-0795

swelch@hartt-trans.com

**Bison USA - North America's Freight Solutions Partner**

