

## Breton, Mary B

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**From:** Graig Morin BDC <gmorin@browndogcarriers.com>  
**Sent:** Thursday, August 24, 2023 3:45 PM  
**To:** DEP Rule Comments  
**Subject:** Comment on Chapter 128: Advanced Clean Trucks Program

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Good afternoon,

My name is Graig Morin and I am the co-founder and president of Brown Dog Carriers LLC based in Biddeford Maine. I am against putting the cart before the horse when it comes to making rules pushing the use of electric vehicles. I am not against incorporating the use of electric trucks when the time is right but as of right now the technology is not there yet. Here are some points to consider.

**#1: As the trucking industry's essential role in the economy continues to grow, our environmental footprint continues to shrink.**

- Truck engines manufactured today emit 98% less nitrogen oxide (NOx) and particulate matter (PM) than those built thirty-five years ago.
- 60 of today's trucks emit what just one truck emitted in 1988.
- Since 2006, the industry has eliminated virtually all sulfur oxide (Sox) emissions.
- Trucking has worked with EPA and DOT on Phase 1 (2011) and Phase 2 (2016) regulations on greenhouse gas emissions, which stand to cut CO2 emissions by 1.37 billion metric tons and reduce oil consumption by over 2.5 billion barrels.
- In partnership with the EPA, we created the voluntary SmartWay program in 2004, further cutting CO2 emissions by 152 million metric tons and saving 357 million barrels of oil – the equivalent of annual electricity use in 23 million homes.

**#2: It is not a question of *if* we get to zero emission, but *when*.**

- The transition away from carbon-based fuels must be a carefully planned process.
- The transition away from carbon-based fuels must be a careful process. Success depends on cost parity, the right market incentives, necessary infrastructure, and access to a wide array of scarce natural resources.
- This transition will require clear, national standards that are technology neutral, empower innovation and enable the industry to plan and invest.
- Government policies and programs must provide sufficient lead time, create regulatory stability for consumers and manufacturers and support necessary infrastructure development.

**Thank you for your time and your consideration of voting down the Advanced Clean truck Program until the time is right and the infrastructure can support it.**

Graig Morin

President

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