

Breton, Mary B

From: Vickey Witham <vwitham@lynchgroup.co>
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To: DEP Rule Comments
Subject: FW: Comment on Chapter 128

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Good morning. On behalf of The Lynch Group, a Smartway Partner, who strives to reduce carbon footprint while providing excellent customer service to our customers, we offer the following comments on the proposed Adoption of Chapter 128 rules.

- Public and private EV charging stations are limited and they are not equipped to handle heavy trucks.
- Investment in more expensive trucks, charging stations, and meeting the demand for power through transmission and delivery upgrades will cost Maine businesses, Maine taxpayers and Maine consumers.
- Remote locations for product delivery will be challenging along with routes that do not have charging capacity, such as rural Maine or new buildings.
- The trucking industry might feel differently about MHDV electrification if plans were in place to address Maine's needed grid upgrades to handle the additional electrical demand, nonexistent charging infrastructure that will result in supply chain chaos, and there was a plan to incentivize adoption of ZEV trucks due to their 3x higher cost to purchase than their clean diesel counterparts.
- MHDV electrification may be one of many solutions to consider in the future when Maine is ready for adoption. Taking a chance on adopting these mandates too early will have serious consequences for Mainers.
- New EV trucks are not currently equipped to handle additional equipment like snowplows, dump bodies, cranes, and other important tools.
- The range of new EV trucks, especially given Maine's cold weather climate, is a limiting factor for consumers and could create additional trucks needed for companies who have to meet product delivery schedules.
- Maine shouldn't allow California lawmakers to craft our regulations.
- Consumer choice to purchase the vehicle that meets their needs for commercial activity is important. Additionally, New Hampshire isn't moving to adopt it, meaning Maine businesses will be competing with other states that can offer more choices and solutions.
- The uncertainty of adopting the CA ACT before important questions are answered will create chaos in an already fragile supply chain, and consumers/taxpayers will end up paying higher prices.

Thank you for taking the time to consider these comments.

Vickey Witham, CSS
Senior Manager of Safety & Compliance
Lynch Family of Companies
(207) 942-2220 x124
www.lynchgroup.co



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