

August 28, 2023



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

Rulemaking Comments for Chapter 128, Advanced Clean Trucks Program

Dear Ms. Cayting,

On behalf of the Maine Beer & Wine Distributors (MBWD) and our members who employ more than 1250 men and women working from 14 facilities statewide to ensure safe and responsible delivery of beverages to more than 4400 retailers, we offer the following comments on the proposed adoption of Chapter 128 rules.

MBWD are committed to environmental responsibility. We have invested in several environmental stewardship initiatives, including the installation of solar panels, free air for coolers, motion-controlled LED lights, air filtration systems and updating equipment to electric fork and lift trucks and pallet jacks. In addition to adding fuel efficient vehicles to our small truck fleet.

As beverage distributors, we rely on refrigerated units for product safety. The availability and range of new EV trucks, especially given Maine's challenging rural geography and cold weather climate, is a limiting factor for our companies who must meet product delivery schedules.

While we respect and appreciate the desired goal to reduce greenhouse gas emissions, as defined in the intent of the rule, we are concerned that the Maine electrical grid cannot handle the additional demand from the adoption of Advanced Clean Truck program. We are firm believers in voluntary adoption versus manufacturing mandates to let the market drive innovation for the trucking applications that make sense.

The [Voice of Maine \(VOM\) August 28, 2023](#), Mechanic Monday (EVs) interview with David Quirk, Quirk Automotive Group, highlighted the continued challenges that EV trucks pose for the state. The commercial sector is not ready yet to embrace EV trucks.

Given these practical and infrastructure concerns, we think the Maine Bureau of Environmental Protection Board should not adopt the proposed Chapter 128 rules. MBWD wants to be an active participant in finding climate solutions, however, adopting these California standards is not the answer, at least not right now.

Regards,

Cheryl Timberlake
Executive Vice President

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