



Maine Forest Products Council

The voice of Maine's forest economy

Companies represented on the MFPC Board

A & A Brochu Logging
American Forest Mgmt.
Baskahegan Co.
BBC Land, LLC
Columbia Forest Prod.
Cross Insurance
Family Forestry
Farm Credit East
Fontaine Inc.
H.C. Haynes
Huber Resources
INRS
J.D. Irving
Katahdin Forest Mgmt.
Key Bank
Kennebec Lumber
LandVest Inc.
Louisiana Pacific
Maibec Logging
ND Paper
Nicols Brothers
Pingree Associates
Prentiss & Carlisle
ReEnergy
Richard Wing & Son
Robbins Lumber
Sappi North America
Southern Maine Forestry
Stead Timberlands
St. Croix Tissue
St. Croix Chipping
TD Bank
Timber Resource Group
Timberstate G.
Wadsworth Woodlands
Wagner Forest Mgt.
Weyerhaeuser
Woodland Pulp

August 28, 2023

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

Dear Ms. Cayting,

Please accept these rulemaking comments on behalf of the Maine Forest Products Council in strong opposition to the proposed adoption of Chapter 128, Advanced Clean Trucks Program.

The Maine Forest Products Council is an organization representing more than 300 members from all facets of the forest products industry. Members include paper mills, sawmills, loggers, truckers, foresters, panel manufacturers, biomass and pellet facilities and secondary manufacturers. We also have more than 8 million acres of dues paying members.

In addition to serving as the Executive Director of the Council, I am also currently serving a second term on Governor Mills' Maine Climate Council. While the Council advocates for intelligent climate actions to reduce Maine's reliance on fossil fuels, we recognize that they must balance the economic and logistical realities of a rural state. Maine's forests are vital in our quest to reduce Maine's carbon footprint. Currently, they sequester 60% of the petroleum-based emissions from Maine with an additional 15% stored in durable wood products. This means that, as a whole, the forest products industry sequesters 75% of our state's carbon emissions, making the health and vitality of this industry critical for our climate future.

As proposed, the Advanced Clean Trucks Program poses significant challenges for the forest products industry, which has immense transportation needs. On an annual basis, over 15 million tons of wood is moved from the forest to manufacturing facilities (an estimated 750,000 loads). These truck routes begin in remote sections of Maine on gravel roads¹ and can end traveling down I-95 to various mill locations. Tremendous horsepower is required of these trucks that range into areas with no electric power, or

¹ There's reference in the regulations to off-road vehicles, but no clear definition for this category.

cell service, for that matter. Once wood is delivered to mills, most forest products are moved by trucks to consumers all along the east coast, representing millions of shipping miles.

We are concerned about a California mandated approach to convert trucking capacity in Maine when we are in our early stages of building the components to a comprehensive action plan. As highlighted in the Mainers for Smart Energy Coalition materials, the challenge cannot be met with mandates for many reasons, including:

- Our electricity supply infrastructure is chaotic and undergoing transformation, but we have a long way to go before we have an understanding of the system design required and the scope of public and private investment needed to establish our desired outcome.
- It is destabilizing to the business community to assume operational roadblocks will be resolved (i.e., ZEV availability and service support, supplemental power requirements of pulp loaders and chip dump trailers, cold weather reductions in driving range, etc.)
- A rule focused on dealerships mandates does not insulate trucking companies from price increases. Dealerships forced into maintaining expensive equipment inventories will pass increased costs to all customers. Particularly in rural states operating in a natural resource economy (these are not Amazon packages being transported).
- These rules will have a disproportionate effect on the regulated community and should be major substantive. We believe it is your prerogative and urge you to reject this rule as routine technical to instead favor more broad and extensive review by the Legislature.

We are a long way off from having the ability to transport logs from the private dirt roads of the North Maine Woods to our mills. For our industry, the logistics simply don't work at this point, making a heavy-handed mandate approach taken in the Chapter 128 program unworkable. The Council recognizes that ZEV's may be ready for certain commercial applications before others, warranting a more targeted adoption strategy. The Climate Council can be tasked to work on a comprehensive approach that matches transportation technology and logistics with electrical capacity.

Maine can do better than incorporating the California Code of Regulations and we should continue our efforts to prepare a State based plan of action that reflects the consensus of Maine's varying economic regions and businesses.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick J. Strauch", with a long horizontal line extending to the right.

Patrick Strauch
Executive Director
Maine Forest Products Council