

August 25, 2023

Maine Board of Environmental Protection
C/O Ms. Lynne Cayting, Mobile Sources Section Chief
Lynne.A.Cayting@maine.gov
17 State House Station
Augusta, ME 04333-0017

Re: Adoption of Chapter 128 Advanced Clean Trucks Program

Dear Members of the Maine Board of Environmental Protection,

We appreciate the opportunity to provide comments in opposition to the citizen petition to establish a program to reduce emissions from on-road vehicles by incorporating the requirements of the California Advanced Clean Trucks regulation.

ReSource Waste Services operates a facility in Lewiston that processes construction and demolition waste. We accept a wide variety of solid, non-hazardous C&D material and optimize the recovery of usable materials, creating valuable products and diverting waste from landfills. We are proud to play an integral part of a regional solid waste network that supports the state's recycling goals.

We wish to be a strong partner with other stakeholders across the state and region in setting and meeting important goals to reduce greenhouse gas emissions and air pollutants. We believe that market forces, with the support of public policy, will continue to drive innovation toward those goals.

ReSource Waste of Lewiston supports dozens of direct and indirect jobs. The facility spends about \$14 million a year and has more than 50 customers and more than 100 vendors. We rely heavily on the trucking industry to haul both inbound and outbound material to and from our facility.

The proposed program is impractical for many reasons, including the following:

- Although innovations are taking place in the field of medium- and heavy-duty zero-emission vehicles (M&HD ZEVs), the technology for the types of heavy-duty vehicles used by the waste and recycling industry is not yet perfected, especially with regard to capacity issues. Furthermore, rear-load and roll-off collection ZEVs are not yet available on a significant enough scale to meet the logistical needs of our industry.

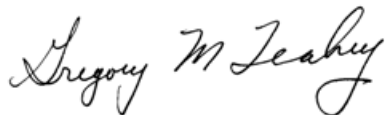
- Maine’s charging infrastructure and distribution system would require significant investment to meet the program’s requirements.
- The cost of M&HD ZEVs is significantly greater than the diesel equivalent and are likely to require an additional power source.
- The battery of a heavy-duty electric truck is likely to increase truck weights significantly. This is likely to create challenges for trucks to meet the state’s existing vehicle weight limits, leading to financial hardship if the trucking industry is forced to decrease load sizes – and possible pressure on the state to reevaluate truck weight limits.
- The Maine market and the Maine economy are vastly different than that of California, and Maine may not be in a position to provide adequate incentives to drive the innovation and investment required to support the program. The state of California Air Resources Board has reported that there is more than \$2.6 billion available in its Clean Transportation Incentives program.

We support market-driven choices for commercial adoption M&HD ZEVs when applications warrant it, not an arbitrary sales threshold that may jeopardize the availability of non-ZEVs that are necessary until technology catches up to aspirations. We believe there may be some shorter-term policies or pilot programs that could be pursued, such as the electrification of vehicles that travel short distances and return to the same location after each shift.

We respectfully request that this program not be approved as proposed and that policymakers pursue a more limited program that is viable, practical and cost-effective.

Thank you for your consideration.

Sincerely,



Gregory M. Leahey
Chief Strategy Officer
gleahey@resource-waste.com