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**To:** [DEP Rule Comments](#)  
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Respectfully to whom it may concern,

I have been providing new and pre-owned medium duty trucks to businesses all over New England for 15 years. I was hired by Rochester Truck in Rochester N.H. and trained by Hino Motors the manufacturer of Hino Trucks based in Novi Michigan.

I sell on average 150 new and pre-owned trucks per year; putting that into perspective that is approximately 2,300 medium duty trucks I have sold and that are operating all over New England.

I have provided at least 40% of those trucks to business in Maine. The majority of customers that operate medium duty trucks, fuel oil delivery, refrigerated, tow trucks, box trucks, are Mom and Pops, they on average own two or up to five trucks.

My book of business allows me to hear firsthand from the owners and operators of these trucks every day and in turn I guess you could say my finger is on the pulse of the medium duty trucking industry.

They are VERY concerned about the reckless pace at which these zero emissions standards are being implemented, some have said it's like being told to build the penthouse suite, when the cement for the foundation hasn't been mixed yet.

Before we begin - The EPA announced on 8/25/22 - regarding the

#### Diesel Emissions Reduction Act

Between 2008 and 2018, DERA led to cleaner air across the United States, saving 520 million gallons of diesel fuel and preventing emissions of the following harmful pollutants:

- 491,000 tons of nitrogen oxides (NOx)
- 16,800 tons of particulate matter (PM)
- 65,600 tons of carbon monoxide
- 5,307,100 tons of carbon dioxide

**In the Past 10 Years, Emissions From Diesel Trucks and Buses Have Been Reduced By 99% for NOx and 98% for Particulate**

## Emissions.

While diesel emissions and emissions in general in the USA have been declining at a record pace over the past 10 years people tend to forget that emissions have increased in the countries that the minerals are mined to make and produce the batteries and components to power electric vehicles and related technologies.

Humanity resides on the same planet, sharing the same atmosphere, so while we decrease and eliminate pollutants and other countries increase them.. I think of the Native American analogy regarding daylight savings time - **"Only a paleface would think that cutting off 2 inches on one end of a blanket and sewing it on to the other end would make it longer"**

In July I traveled to San Diego California and sat in meeting after meeting listening to suppliers of the EV technology Hino Truck Manufacturing is implementing for people who CHOOSE to invest in EV trucks starting next year from engineering to batteries to charging stations.

I had conversations with the engineers and owners of the companies supplying the technology, and they talk a great game, but then again so does every snake oil salesman.

The game falls apart when you start talking about operating daily in and through New England winters.

Now I don't know about you, but I heat my house for about 8 months and a few days out of the year starting in October, and as soon as I started asking about efficiency of charging stations - which I was told cease to work efficiently or at all at 20 degrees and below; and knowing that we have WEEKS of that weather late December through February well, they would get a little uncomfortable.

DOWNTIME costs THOUSANDS of dollars.

If the truck is down because it can't be charged up enough because it's too cold outside to run its delivery route at all or in full effects not only the supplier of the goods but the vendors who depend on that supplier, and the customers who depend on that vendor.

I could go on, but here is the one thing that you can count on -

The driving force behind the increased cost of goods and services is the cost to transport, and the cost of the vehicles that transport and provide them.

As trucks cost more, your milk and eggs at the store cost more.

As diesel fuel costs more, your milk and eggs at the store cost more.

If a company has to buy a charging station, build a heated building to put it and the truck or trucks in your milk and eggs are going to cost a LOT more.

When the company has to buy two trucks to haul the same size load over the same area that they used to be able to do with one diesel powered unit, in turn having to hire another driver, carry more insurance, and charge both of them in the heated building they had to buy for their EV trucks..

You better go out and buy your own cow and some chickens.

Leave the medium duty industry alone, the trucks are running cleaner than they ever have, the manufacturers have a handle on the SCR technology and once the supply lines heal up new trucks are being produced at stocking levels again the prices will soften up across all OEM's and in turn your milk and eggs will be back to digestible prices.

If you implement the CARB crap, you are going to see the prices of used diesel powered trucks sky rocket, inflation continuing, as fleets will be cannibalizing off of their older trucks to keep things going before they ever have to invest their hard earned money into unsustainable inefficient EV technology

Sincerely,  
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