

Testimony in opposition to the Advanced Clean Trucks Rule, as delivered in person to the Maine Board of Environmental Protection by Glenn Adams on August 17, 2023.

Good evening, Chair Lessard, Commissioner Loyzim, members of the board, and staff. My name is Glenn Adams, I'm a resident of Oakland, and I'm the business development director for Sargent Corporation of Orono, Maine. We are a 97-year young 100% employee-owned company with over 350 Maine employees. I'm testifying today in opposition to the Advanced Clean Trucks Rule. To be clear, Sargent is a supporter of, and a contractor involved with, green and renewable energy in Maine. We have many concerns with this rule, some of which I'll briefly outline for you.

1. Equipment availability. We are currently seeing 6-12-month lead times for heavy trucks in the already well-established diesel market. An order for 4 new Mack's placed in early July was given a "hopeful" delivery date of first quarter 2024. It's hard to fathom the timeline for delivery in an emerging zero-emission market.
2. Range limits and charging infrastructure. A major part of our work is remote specialty and heavy civil projects. Currently, some of our projects are in: Moscow – wind farm; Cherryfield – wind farm; Cutler – solar farm; Danforth – fish passage; and Calais – dam removal. Projects will continue to be developed in rural Maine for the foreseeable future, including large renewables projects. Will the electric infrastructure and EV ranges be able to support the development of these projects?
3. Weight limits. Our heavy equipment needs to be trucked to our projects and many pieces such as the Cat D8, Link Belt 350, and Cat 740 haul truck, for example, are all in excess of 40 tons. If the weight of an electric tractor increases, how will it change what we're able to mobilize? Will we need to invest in more trucks, new trailers, or make additional trips?
4. Maintenance. It's no secret in our industry that mechanics are hard to come by. The diesel market is long-established, and we have hiring struggles now. Will there be any folks trained to repair the new trucks? How many, and where will they be?
5. Reliance on hired trucks. Last week our company paid for 28 separate hired trucks to haul for us, in Maine. How will these sole proprietors / small businesses be affected by this change? Will they be able to stay in business? Many companies like ours rely on hired trucks. Let's not forget them while they're out there building Maine infrastructure.

Thank you, and I'll do my best to answer any questions you may have.

Corporate Headquarters

Telephone: 207-827-4435

Fax: 207-827-6150

3 Godfrey Drive
Orono, ME 04473

New Hampshire Operations

Telephone: 603-734-2132

Fax: 603-734-2197

25 Spaulding Road
Unit 19
Fremont, NH 03044

Mid-Atlantic Operations

Telephone: 804-368-7118

Fax: 804-368-7387

11139 Air Park Road
Suite 1
Ashland, VA 23005