

Breton, Mary B

From: Scott Cyr <Scott.Cyr@oconnormaine.com>
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Subject: Comment on Chapter 128: Advanced Clean Trucks Program

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Most of us have experienced a slow turning car battery on a cold February morning, it is a fact of life even with new vehicles in cold weather climates. Maine is a large state, many don't realize the variation of climate throughout the state. I've lived in the greater Portland area for decades but grew up in a small town in Northern Maine and quickly came to realize that summer lasts 3 weeks longer in southern Maine and spring comes three weeks earlier. Down east, western and northern Maine weather varies greatly from Cumberland and York county, in fact most areas of Maine weather differs greatly from the coastal counties.

Have you ever heard someone say that 20 degree below zero weather is no worse than a 0 degree temperature? That is a sure sign they have spent little or any time in truly cold weather because there most definitely is a difference. Another thing I've heard many comment on is that they have never traveled north of Bangor, Waterville, Augusta, Brunswick..... Fort Kent is 200 miles north of Bangor- Kittery is 185 miles south, much of rural Maine relies on our natural resources to make a living. Allowing people who have little knowledge of the climate, terrain and the jobs people of Maine do to feed their families in some of the most beautiful and remote areas of our state would be irresponsible.

It is nice the technology for BE passenger vehicles soon will allow trips to some remote areas of our state in the warm months of the year. My question is who would consider putting their own family; maybe infant grandchildren, in a BEV in the middle of a cold windy night in February for a 150 mile drive. If that vehicle fails half way to Jackman or Machias or Caribou and the nearest street light is 20 miles away you have a problem.

BE commercial vehicles (trucks) are an entirely different animal, in the south some are in use in tightly controlled routes between warehouses on short hauls with light weight loads. Those types of loads are very uncommon, you can only ship so many loads of potato chips. The norm is for a freight truck to be loaded to 80,000 pounds in varying weather conditions, road surfaces and wind speeds that affect rolling resistance. Battery life estimates which we hear are in an ideal environment, they vary significantly in "real world" conditions

I've been involved with trucking, construction and commercial vehicles for most of my life and have spent much of the past couple of decades involved with the technologies designed to reduce trucking's carbon foot print. Much progress has been made, a properly running late model tractor trailer engine will have no soot; (particulate matter), in the tailpipe. The catalyst in the exhaust after treatment system produces a chemical reaction which significantly reduces NOx, in fact 1-1998 truck produces 30x more emissions than a late model truck. Trying to force \$450,000 BE trucks onto people will entice them to rebuild their 30 year old engines over and over again (remember these are the engines which produce 30X the emissions as a late model diesel engine).

Until these alternative fuel trucks are capable of doing the same amount of work as today's trucks to implement them on a large scale would be irresponsible. Even if it was possible the cost would cause significant disruption to our economy. At the end of the day we the consumers will always have to pay the bill.

Scott Cyr / GM
O'Connor Motor Company
Main: 207-797-7837
Cell: 207-242-4513
www.oconnortrucks.com

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