



Seven Islands Land Company

Comment on Chapter 128: Advanced Clean Trucks Program

August 22, 2023

TO: State of Maine Board of Environmental Protection

FROM: Daniel LaMontagne, President & CEO, Seven Islands Land Company

Hello, my name is Daniel LaMontagne, and I am a resident of Veazie, Maine and President and CEO of Seven Islands Lands Company. Seven Islands is based in Bangor and oversees management of a large family timberland ownership in Northern and Western Maine. We manage over 800,000 acres of forestland and also have two wood products manufacturing facilities; a hardwood lumber sawmill and a hardwood chip mill -- located in Portage, Maine. We directly employ 85 hard working Mainers across our operations and indirectly employ hundreds more in the form of contractors and subcontractors to harvest and haul our timber and other wood products.

Seven Islands is a party to one of the most climate friendly industries in the state. The forest products industry, and specifically, Seven Islands, sequesters carbon in the forests that we manage; we lock up carbon in long-lived wood products such as lumber, and our lower quality wood is used to produce renewable energy from biomass and wood pellets. As such, we are strong advocates of finding market-based approaches in which to continually improve our impact on the climate.

While electrification of medium and heavy-duty trucks could be one possible option to transition our supply chain to lower greenhouse gas emissions, we believe that the petition prompting the Board of Environmental Protection's consideration of adopting the California Advanced Clean Truck Rules is poorly timed, irresponsible, and would create significant economic hardships for the forest products industry as a whole.

While great strides have been made in improving the performance, capacity, and range of electric vehicles, many questions and concerns remain regarding how these vehicles might perform in the conditions frequently encountered in the forest products industry. Some of these concerns include, but are not limited to:

1. **Range:** The industry operates in very rural and remote parts of the state. There is little to no electric infrastructure, whether for transmission or charging, in most of Maine's commercial timberland. This raises important concerns over the actual loaded range for the proposed vehicles.
2. **Payload:** Current payloads on private logging roads can exceed 100,000 lbs. which is well in excess of what current battery electric vehicle (BEV) technology can support. The need to add additional truck capacity to haul the same payloads would add substantial expense to the cost of moving forest products.
3. **Labor:** With needing more trucks to perform the same work, additional drivers would be needed. Currently there is a shortage of qualified drivers interested in hauling wood products or

other goods. This would exacerbate this issue as well as add significant expense in order to try and attract and retain additional drivers.

4. **Infrastructure:** In addition to severe lack of electrical supply infrastructure in the woods, many of the trucks used in the industry have center mount cranes which would represent a meaningful draw on battery storage and would, at a minimum, drastically lessen the range of the BEV vehicles. Furthermore, service trucks, mobile cranes, and snowplow trucks are also common vehicles used in the woods that would all experience capacity and range issues due to secondary draw on vehicle batteries.
5. **Reliability:** Trucks in the forest products sector, particularly those that work in the woods, are exposed to severe weather conditions such as sub-zero temperatures, deep snow, dust, and rough gravel roads, all conditions that could have a material negative impact on the performance and useability of electrification technology.
6. **Cost:** In addition to the cost considerations mentioned above, BEV's are significantly more expensive than their diesel equivalents, and coupled with needing more trucks to perform the same work, would put a material financial burden on an already fragile forest products supply chain.

Seven Islands believes that our forests, sustainable forest management, and the broader forest industry, including sawmills, pulp mills, logging and hauling contractors, and others, are an important, existing, proven, market driven, and scalable climate solution. Having a viable, solvent, cost effective, and robust forest products transportation supply chain is a vital part of the system that helps delivers forest-based climate benefits. Adopting the California Advanced Clean Truck Rule would create significant economic and regulatory hardship on this supply chain, increasing the cost and reducing the reliability of the supply chain associated with one of the state's most climate beneficial industries.

Thank you for your consideration.

Daniel J. LaMontagne
Seven Islands Land Company