

**Testimony of Eliza Townsend, Maine Conservation Policy Director**  
**In support of**  
**Proposed Chapter 128, *Advanced Clean Trucks Program***  
**Maine Board of Environmental Protection**  
**August 17, 2023**

Good morning, Chair Lessard and distinguished members of the Board of Environmental Protection. I am Eliza Townsend, Maine Conservation Policy Director for the Appalachian Mountain Club, whose mission is to foster the protection, enjoyment, and understanding of the outdoors. We have 6,600 members in Maine and own 100,000 acres of forestland in the 100-Mile Wilderness region of Piscataquis County, managed for multiple-use including sustainable forestry, backcountry recreation, and environmental education.

I am pleased to speak to you today to ask you to adopt the *Advanced Clean Trucks Program*. The need to address climate change has never been more urgent, and the evidence has been all around us this summer, from record-breaking heat to devastating floods to the tragic loss of life in Maui.

With the death toll climbing in Hawaii, we are only too aware of the dangers of climate change. As reported by the Bangor *Daily News*, Maine has experienced a record number of flash floods this summer, with the resulting damage to infrastructure.<sup>1</sup> The University of Maine's Climate Change Institute found that the hottest days ever recorded in human history took place on July 3 and 4.<sup>2</sup> Partnering with the Mount Washington Observatory to analyze 100 years of weather data, AMC's Research Department has determined that winters in our region are now 3 weeks shorter, and punctuated by periods of warming they refer to as "winter whiplash"<sup>3</sup> which threatens not only safety, but also crops, infrastructure, and the future of our outdoor recreation economy.

We need to act swiftly and boldly to avert the worst effects of climate change. Both Maine's Climate Action Plan<sup>4</sup> and our statutes<sup>5</sup> recognize the urgency and therefore call for achieving net-zero greenhouse gas emissions by mid-century. To get there, we must tackle the transportation sector, which accounts for nearly half of Maine's annual carbon pollution. That means adopting the two proposed rules before you today.

The trucking sector is a leading source of unhealthy air pollution and also has an outsized climate impact. While trucks and buses account for only 5 percent of vehicles on Maine roads, they are responsible for 27 percent of our transportation greenhouse gas emissions.<sup>6</sup> In fact, emissions from trucks are the fastest growing source of climate-harming greenhouse gas emissions, and the number of truck miles traveled on the nation's roads is forecast to continue to grow significantly in the coming decades.

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<sup>1</sup> <https://www.bangordailynews.com/2023/08/08/news/infrastructure-damage-flash-flooding-maine/>

<sup>2</sup> <https://umaine.edu/news/blog/2023/07/05/media-cite-umaine-climate-reanalyzer-in-reporting-about-unofficial-hottest-day-on-record/>

<sup>3</sup> <https://iopscience.iop.org/article/10.1088/1748-9326/ab54f3>

<sup>4</sup> [https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/MaineWontWait\\_December2020.pdf](https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/MaineWontWait_December2020.pdf)

<sup>5</sup> <https://legislature.maine.gov/legis/statutes/38/title38sec576-A.html>

<sup>6</sup> [www.maine.gov/future/sites/maine.gov.future/files/inline-files/Maine%20Clean%20Transportation%20Roadmap.pdf](http://www.maine.gov/future/sites/maine.gov.future/files/inline-files/Maine%20Clean%20Transportation%20Roadmap.pdf)

This proposed rule will accelerate sales of zero-emission vehicles over 8,500 pounds gross vehicle weight rating. By transitioning from gasoline and diesel combustion engines to zero-emission engines, the proposed rule will reduce emissions of carbon dioxide (CO<sub>2</sub>), oxides of nitrogen (NO<sub>x</sub>) and fine particulate matter (PM<sub>2.5</sub>) including one of PM<sub>2.5</sub>'s highly warming components, black carbon. By 2050, implementing the ACT rule will reduce CO<sub>2</sub> equivalent emissions by 12%, NO<sub>x</sub> emissions by 13%, and fine particulate matter emissions by 10%.

Reducing pollution will benefit Mainers in multiple ways. Not only will we meet the critically important climate goal of net-zero emissions by mid-century, but by cleaning our air we can improve health, reduce asthma attacks, lost workdays and hospitalizations, even avoid premature deaths. According to a Clean Air Task Force analysis, diesel pollution from heavy-duty vehicles costs Mainers more than \$290 million in health care costs and over 1,000 lost workdays each year, with more than 6,000 individuals impacted by days where poor air quality restricts activity<sup>7</sup>.

Further, by 2027, zero-emission trucks and buses will become less expensive to purchase and to operate than their combustion engine counterparts, saving fleet operators money.<sup>8</sup>

The urgent need to act to counter the worst effects of climate change, in addition to the improvements to our economy, health, and quality of life make the choice clear. Please adopt the proposed *Advanced Clean Trucks* rule before the end of 2023.

Thank you.

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<sup>7</sup> <https://www.catf.us/deathsbydiesel/>

<sup>8</sup> <https://www.edf.org/media/new-study-finds-rapidly-declining-costs-zero-emitting-freight-trucks-and-buses>