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Subject: ACT Rulemaking

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I respectfully urge adoption of the Advanced Clean Trucks (ACT) rule. It is essential to achieving the state's 2050 climate benchmark of 80% reduction in GHG emissions by 2050. We must move our transportation sector to electricity and away from economically volatile, polluting fossil fuels. The climate catastrophes around the world show that we have no time to lose.

According to [Maine's Clean Transportation Roadmap](#), while trucks and buses only account for 5 percent of vehicles on the road, they are responsible for nearly 27 percent of total transportation sector greenhouse gas emissions. 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. There are over [200 zero-emission truck and bus models in production, development or demonstration](#), with models for each major segment of the heavy-duty vehicle market, including transit and school buses, delivery vans, box trucks, and combination trucks. Truck manufacturers are continuing to advance the capacity of the trucks on the market. Many truck fleet operators [want electric trucks](#), and the ACT rule will ensure that electric trucks are available for purchase in Maine.

A recent [report](#) analyzing the projected total cost of ownership in 2027 for several medium- and heavy-duty market segments (including transit and school buses, shuttles, delivery vehicles and refuse haulers) shows that the electric vehicles are better investments for consumers than their fossil fuel counterparts. Another recent report shows that [by 2027](#), the purchase price alone will make many categories of electric MHD vehicles (including transit and school buses; delivery vans and trucks, and refuse haulers) less expensive than their fossil fuel counterparts. The ACT rule is technically feasible and cost-effective, with numerous compliance flexibilities built in to help manufacturers meet the requirements. Through these flexibilities, the rule can account for market fluctuations.

The time to act is now, there is no time to lose.

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