

## Breton, Mary B

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**From:** Thea Sames <Thea.Sames.392548720@p2a.co>  
**Sent:** Saturday, August 26, 2023 9:58 PM  
**To:** DEP Rule Comments  
**Subject:** Comments Regarding Proposed Chapter 128: Advanced Clean Trucks Program

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Dear Maine Board of Environmental Protection,

I would like to express my support for the proposed Chapter 128, Advanced Clean Trucks Program, and to ask you to adopt the rule before the end of 2023.

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.

To avert the worst effects of climate change, we must achieve net-zero Greenhouse Gas emissions by mid-century, and to get there we need to adopt the Advanced Clean Trucks Program before the end of 2023.

The trucking sector is a leading source of unhealthy air pollution and also has an outsized climate impact. While trucks and buses only account for 5 percent of vehicles on Maine roads, they are responsible for 27 percent of our transportation 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.

We need to act now to reduce the climate impact of trucks and buses. This proposed rule establishes a program to reduce emissions from on-road vehicles over 8,500 pounds gross vehicle weight rating (GVWR) by incorporating the requirements of the California Advanced Clean Truck regulation. It is intended to accelerate sales of zero-emission vehicles over 8,500 pounds GVWR.

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 PM<sub>2.5</sub> 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, and 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.

Further, by 2027, zero-emission trucks and buses will become less expensive to purchase and operate than their combustion engine counterparts, saving fleet

operators money.

For all these reasons, I urge you to adopt the proposed Advanced Clean Trucks Program by the end of 2023. Thank you for the opportunity to comment on this proposed rule.

Regards,  
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