

August 28, 2023

Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333-0017
Email: rulecomments.dep@maine.gov

RE: Comment on Chapter 128: Advanced Clean Trucks Program

On behalf of The Union of Concerned Scientists (UCS) and our over 3,200 supporters, activists, and Science Network members in Maine, we urge the Board of Environmental Protection (BEP) to fully adopt the Advanced Clean Trucks rule without delay. The ACT rule is one of the most important air and climate pollution regulations to be considered by the state.

Adoption of the ACCII standard is an important step towards cleaner air and lower climate changing emissions in Maine. The transportation sector is the largest source of greenhouse gas emissions in the state (49% in 2019)¹. Though they make up only around 8% of the vehicles on the roads, medium- and heavy-duty trucks and buses contribute about disproportionate 27% of transportation sector greenhouse gas emissions.² In order to meet the state's ambitious climate goals of an 80% reduction from 1990 levels by 2050, DEP must adopt the ACT as soon as possible.

Electric trucks perform better than their diesel counterparts. UCS has conducted analysis to show that in Maine, from smaller delivery vans to long-haul tractor trailers, electric trucks emit 83-91% less greenhouse gas emissions over their life cycles compared to their diesel counterparts, as well as contributing to 45-76% reduction in mortality from air quality.³ By adopting the ACT, the ICCT has shown that Maine would reduce medium- and heavy-duty emissions of nitrogen oxides by over 20,000 tons, particular matter emissions by over 180 tons, and well-to-wheel CO₂e emissions by over 22 million metric tons by 2050. This adds up to billions of dollars in public health, climate, and fleet benefits.⁴

This rule also provides market certainty with a gradual and technically feasible timeline for increasing sales of zero-emissions vehicles. In particular, it provides certainty for proactive utility planning to take advantage of the many grid benefits of zero-emissions vehicles, which include being able to use their batteries for grid resilience, as well as downward pressure on utility rates which will benefit everyone who pays an electricity bill. Fleets also will rely on a steady supply of these zero-emissions vehicles in order to take advantage of their lower fuel and maintenance costs that give them a lower total cost of ownership.⁵

¹ https://www.maine.gov/climateplan/sites/maine.gov.climateplan/files/inline-files/9th_GHG_Report_FINAL%20%282%29.pdf

² <https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/Maine%20Clean%20Transportation%20Roadmap.pdf>

³ Forthcoming UCS study

⁴ <https://theicct.org/wp-content/uploads/2022/09/HDV-fact-sheet-ME-092122.pdf>

⁵ <https://www.ucsusa.org/resources/ready-work>

Lastly, this rule prepares Maine to take advantage of the over \$2.8 billion in federal funding from the Inflation Reduction Act geared for medium and heavy-duty trucks and buses.⁶ In addition, there are significant incentives for charging infrastructure, including an announcement in February about a freight corridor study by National Grid that would forecast traffic demand.⁷ This rule would provide the certainty and timeline that would allow Maine to take advantage of more of these investments.

We commend the careful stakeholder outreach the BEP has done and now is the time to act. We urge BEP to move forward with these rules without delay to move Maine forward on a cleaner transportation future.

Sincerely,

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⁶ <https://www.erm.com/contentassets/154d08e0d0674752925cd82c66b3e2b1/edf-zev-baseline-technical-memo-addendum.pdf>

⁷ <https://www.energy.gov/articles/biden-harris-administration-announces-funding-zero-emission-medium-and-heavy-duty-vehicle>