



Testimony of

DANA A. DORAN
Executive Director
Professional Logging Contractors of the Northeast

Before the Joint Standing Committee on Environment and Natural Resources on LD 2261, An Act Designating New Motor Vehicle Emissions Rules as Major Substantive Rules

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Senator Brenner, Representative Gramlich, and members of the Joint Standing Committee on Environment and Natural Resources, my name is Dana Doran, and I am the Executive Director of the Professional Logging Contractors of the Northeast (PLC). The PLC is a trade association that represents logging and associated trucking contractors throughout the Northeast, predominately in the state of Maine.

As background, the PLC was created in 1995 to give logging and associated trucking contractors a voice in a rapidly changing forest products industry. As of 2021, logging and trucking contractors in Maine employed over 3,000 people directly and were indirectly responsible for the creation of an additional 2,500 jobs. This employment and the investments that contractors make contributed \$582 million to the state's economy. Our membership, which includes 210 contractor members and an additional 120 associate members, employs more than 75% of the individuals who work in Maine's logging industry and is also responsible for 80% of Maine's annual timber harvest.

Thank you for providing me with the opportunity to testify on behalf of our membership in support of LD 2261. We would like to thank Representative Soboleski for bringing this bill forward, as the Chapter 128, California Advanced Clean Trucks Regulation rules will have a significant impact on the logging industry.

The PLC testified in opposition to the adoption of the Chapter 128, California Advanced Clean Trucks Regulation rules by the Maine Board of Environmental Protection in July 2023. Our membership hauls and delivers raw forest products throughout the state from the forest to the mill. The majority of the product that our members haul is derived from remote forested areas and is delivered by heavy duty trucks to other rural areas. These trucks generally operate in areas without access to electrical infrastructure, must be able to function 24 hours a day and must be reliable at all times of year, especially in the winter.

We also learned during the public input process in July 2023 that there are no plans by any heavy-duty manufacturer to produce a Class VIII Heavy Duty Tractor in an electric model at any time in the future. Put simply, this industry cannot be mandated to use Heavy Duty Zero Emission Vehicles when there is no plan to manufacture them, and our members operate in locations that lack the proper electrical infrastructure to support them. Forcing the industry to use these vehicles puts the entire forest products supply chain at risk.

For those unfamiliar with some of the many additional costs our industry has already taken on to reduce emissions. Since 2014, the federal government has mandated that all new trucking equipment manufactured in the United States must meet Tier IV (zero emissions) specifications. This has lowered diesel emissions by 99%, but it has increased the cost of all new equipment and trucks by 80%. I can tell you that the price of wood has not increased to accommodate the increased cost of investment.

We believe strongly that by changing the designated rulemaking process for potential mandates like the California Advanced Clean Trucks Rule to Major Substantive through this legislation, the rules will receive input from the entire Maine Legislature and be fully vetted through a public process. Policy decisions that have such a wide scale impact such as the California Advanced Clean Trucks Regulation rules, should not be implemented by a process that only requires 150 signatures. It is crucial, to have representation from all areas Maine weigh-in, as what is good for Portland, may not be good for Presque-Isle.

With that being said, this bill is not only about the rules themselves, but the process on how they get implemented. Rural economies, which may not have the infrastructure to support such a change are unfairly targeted by the implementation of these rules. Rural economies deserve to have their elected state senator or representative stand up for their best interests.

In closing, LD 2261 has an opportunity to improve the process by which new motor vehicle emission rules are implemented by putting the rulemaking process before the full legislature, instead of being unilaterally implemented through the Department of Environmental Protection. We are thankful for your time and service to the people of Maine and encourage you to vote ought to pass.