

Townsend, Erle

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To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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I am opposed to this law for several reasons:

1. The electrical grid in Maine is unreliable, often having lengthy power outages for many citizens. The infrastructure is antiquated and needs serious work to bring it to a level that would not only support current usage, but the increased usage required of this law. (Take the storm we just had where approximately 400,000 citizens (over ¼ of the state) were without power, many for 4+ days; how are they to get to work or go about their daily activities when their access to vehicles is impeded because they cannot be charged.) Also, what use is it to have all these vehicles charged with electricity that is not 100% (or even close to 100%) produced by renewable sources in lieu of power being produced by fossil fuels? Doesn't that defeat the purpose of switching to EV?
2. There is not enough EV charging stations available to support moving in this direction. While I know that various communities are in the process of implementing charging stations, there is a long way to go to make this a 'norm'. What about residents in rural Maine? Where are they to find charging stations to meet the needs of their communities?
3. The cost of electricity is rising drastically (without improvements to the delivery of service), making the transition unrealistic.
4. The cost of switching is prohibitive to many of Maine's citizens. As of 2022, approximately 11% of Maine citizens are living below the poverty level. Many others are on fixed incomes (retired) without the ability to absorb other major expenses and possible upgrades to their homes to accommodate charging these vehicles. A study published by the United Way of Southern Maine reported that in 2021 42% of Maine households struggled to afford basics due to the State's high cost of living. Maine continues to trend as the oldest (population age) state. As of 2021 19+% of Maine's population was 65 years or older.
5. These vehicles have a limited range of use and are prohibitive for distance travel, requiring repeated lengthy stops to re-charge (and with inadequate opportunities to charge, especially in the more rural areas of the state – which is the majority of the state). Also, the climate in Maine would further impact the range of a charge; batteries do not fully hold charges in cold weather.
6. What is the plan for dealing with the 1,500,000 gas/deisel powered vehicles in Maine as they are "retired" before their useful life is over? What is the environmental impact for these disposed vehicles?
7. What about the environmental impact of the materials to build the EV batteries and to dispose of the toxic chemicals and heavy metals required to produce the lithium batteries. Further, the minerals and metals are sourced primarily through China and other foreign countries; in the current geopolitical situation, it is not a wise direction for the US to increase it's dependence on these countries for resources controlled by their supply chains.

8. What is Maine planning to do to make the switch without burdening it's citizens? Who can afford to replace their vehicles? Certainly not the average person. And even if they could, where is the supply to come from. Currently, the wait for EV municipal vehicles are 2-3 years out (you have to order that new truck years ahead of when you need it). We are still recovering from the shortage of vehicles that occurred during COVID due to supply chains and production problems.

Unless Maine plans to "gift" each of it's tax payers with a new EV car and provide the infrastructure to support it, to safely dispose of the end of life battery components, and to recycle the CARcasses (pun intended) I don't support this law.

Maine is not California! Just look at the shape they are in, and we want to emulate that?! We should not be implementing a California law. Our climate, infrastructure, economy, and population in no way is comparable to California. This law does not make sense for the state of Maine. Why not let individuals decide what is best for themselves and not government mandates (can the government even force an individual to buy something, where is the free market in this mandate?). If EV is really the future for Maine, then it will sell itself and it won't need to be pushed on everyone.

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