

Townsend, Erle

From: Trish <trishthebirder@gmail.com>
Sent: Monday, February 5, 2024 12:27 PM
To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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My name is Patricia “Trish” Berube, of Lewiston, Maine.

I oppose the EV mandates being proposed. It is clear that this mandate does not reflect the needs of Mainers:

1. The battery drains when temperatures dip. [EV work best for climates around 60-80 degrees year-round.](#)
2. EVs won't reduce carbon emissions if our electric grid can't handle it.
3. Electric batteries do not warrant the destruction of the environment in new ways. Battery material for these cars must be mined in areas that are environmentally vulnerable. Moreover, mining of these materials is far *worse* for the environment. [Lithium](#)
[Nickel](#) [Cobalt](#) [Manganese](#) [Graphite](#)

Is America officially owned by China? "[The leading EV battery manufacturer in the world is CATL \(Contemporary Amperex Technology Co. Limited\), a Chinese company with around 34% of the total EV battery market share. This is unsurprising given that China holds 70% of the production capacity for cathodes and 85% for anodes and that more than half of the raw minerals used for making an EV battery also come from China.](#)"

As a citizen of Maine, USA (until that changes), I see this mandate as downright nonsensical. Please do not support exclusively electric vehicles. Not now. Not ever.

Considerations:

- <https://www.consumerreports.org/cars/hybrids-evs/how-temperature-affects-electric-vehicle-range-a4873569949/>
- <https://blog.evbox.com/what-are-ev-batteries-made-off#:~:text=The%20cathode%20is%20typically%20made,protects%20it%20against%20mechanical%20damage.>
- Lithium: <https://www.mining-technology.com/analyst-comment/lithium-mining-negative-environmental-impact/>

- Nickel: "Nickel mining raises concerns about pollution, indigenous rights, GHG emissions, and working conditions. Dominance of nickel production by certain countries may also present problems: for example, the world's largest producer is Indonesia, a situation that presents both ESG and single-source risks"—<https://insights.issgovernance.com/posts/nickel-supply-risks-and-esg-issues/#:~:text=Nickel%20mining%20raises%20concerns%20about,ESG%20and%20single%2Dsource%20risks..>
- Cobalt: "Cobalt is fast turning from a miracle metal to a deadly chemical as toxic dumping is devastating landscapes, polluting water, and contaminating crops. High concentrations of cobalt have even been linked to the death of crops and worms, which are vital for soil fertility."—<https://earth.org/cobalt-mining-in-congo/#:~:text=Cobalt%20is%20fast%20turning%20from,are%20vital%20for%20soil%20fertility.>
- Manganese: "This [mining of manganese] is problematic as Mn [manganese] is easily bioaccumulated, which can lead to unwanted ecotoxicological effects, and—in the case of prolonged exposure to high doses of Mn and its compounds—to detrimental human health impacts."—<https://www.mdpi.com/2073-4441/14/7/1091#:~:text=This%20is%20problematic%20as%20Mn,to%20detrimental%20human%20health%20i mpacts.>
- Graphite: "Another reason why China is superior to other countries in the production of graphite is because China is a significant manufacturing center globally. China's strong industrial and technological sectors drive its constant need for graphite."—<https://globaledge.msu.edu/blog/post/57351/china-is-the-worlds-leading-graphite-pro#:~:text=Another%20reason%20why%20China%20is,its%20constant%20need%20for%20graphite.>

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“There is some good in this world, Mr. Frodo,” says the brave and loyal Samwise Gamgee, “and it’s worth fighting for.”