

## Townsend, Erle

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**From:** Tim Collins <winterport1@gmail.com>  
**Sent:** Saturday, December 30, 2023 9:22 AM  
**To:** DEP Rule Comments  
**Subject:** Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting).

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EVs have a place in the mix of vehicle types. They are essentially a "niche" vehicle popular with the wealthy who have short, local commutes and who are able to charge the vehicles at home (and who often own "backup" ICE vehicles). The wealthy also can afford the hefty EV prices, and the wealthy benefit from the government (taxpayer) support. Essentially, EVs are a transfer of wealth from the poor and middle class to the rich. Nevertheless, they should be available to those who want to buy them, although without the subsidies.

For the rest of us, though, they are impractical due to high initial costs, short ranges (shorter still in winter), ridiculously long recharge times, inability to recharge them, along with higher insurance and repair costs, and uncertain/no resale values. If viewed from the mining of the raw materials to eventual disposal of the retired vehicle, they consume more energy, and produce more pollution, than a conventional vehicle. They will never - never- be able to replace one for one the ICE vehicles of all types on the road because large numbers of them would simply collapse Maine's already crumbling and increasingly weather-dependent electric grid. The only possible long term outcome of the Maine DEP "rule" is depopulation of large rural sections of Maine with the poor and middle class condensed into increasingly unpleasant and congested urban centers, with private personal transportation reserved for the wealthy. If the Maine DEP rule goes into effect, a further consequence of decreased ICE vehicles will be the loss of gas stations, which will further accelerate the depopulation of much of Maine.

So - should EVs be available (w/out subsidies) if someone wants to buy them? Of course. With time, they may make up a somewhat larger fraction of the vehicle mix, especially in urban/low distance travelled scenarios where they sometimes make sense. But for most people they are, and always will be, neither sensible nor realistic. The Maine DEP is far exceeding its authority by embarking on this sort of "rule making" activity.

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