

## Townsend, Erle

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**From:** Ralph Cadman <cadmanrw@gmail.com>  
**Sent:** Saturday, December 30, 2023 10:37 AM  
**To:** DEP Rule Comments  
**Subject:** Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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From: Ralph Cadman, Westport Island, Lincoln County

To BEP, I am submitting a follow-up to my comments from the initial comment period. Since close of the initial comment period, new relevant information and commentary have emerged. Specifically, your report in response to citizen comments, and requests from car dealers and car manufacturers to the Biden administration to “slow roll” the EV mandates. I am not opposed to EVs. I am opposed to government mandate. Let the market and the consumer decide. Freedom of choice is the basis for America’s founding.

First, to your report. The prevailing theme in the response to citizen comments is along the lines of: ‘yes, that is a valid concern (high cost, low range, high maintenance, lack of charging infrastructure, safety, homeowner investment for charging capacity, etc) but industry experts expect those problems to be resolved in the near future’. Well ok, that seems like the perfect reason not to implement a mandate now. Wouldn’t the wise consumer wait to see the proof of these claims before committing oneself to a new technology investment. Suppose, you have a teenage daughter who graduates high school in 2 years, and you promised to buy her a car for her graduation cross country trip, but you would only commit now to sending her in an EV. If you really thought this thru, you would wait until the time comes and get her the safest, most reliable vehicle you could, and not condition the trip on an unproven (today) EV.

Second, there is now mounting evidence from the auto industry that EVs, and their infrastructure are a ways off from prime time.

1. Ford Dealers (Epoch Times report 12/24) Just over half of all Ford dealers have opted to sell electric vehicles (EV) in 2024, down from roughly two-thirds that expressed willingness to do so around the same time last year, which comes as EV enthusiasm appears to be cooling. ‘lack of charging infrastructure, reliability issues, and persistent concern about “range anxiety” ‘
2. Honda & GM (same report as above) Honda and General Motors announced recently that they were scrapping a \$5 billion plan to develop EVs together, while GM said that it was slowing its electrification strategy
3. A recent [study](#) by the American Automobile Association (AAA) found that EV range can fall by up to a quarter when the vehicle is carrying heavy loads
4. [Another recent study](#) by consultancy Ernst & Young—in collaboration with European energy industry body Eurelectric—found that range anxiety is the second-most cited concern about switching to an EV, with a lack of public charging stations in the top spot.
5. As for reliability, a recent [Consumer Reports analysis](#) showed that, on average, EVs were found to have had 79 percent more problems than gasoline-powered cars.
6. A [recent study](#) from the Austin-based think tank Texas Public Policy Foundation (TPPF) found that, when taking into account various subsidies and regulatory credits, the actual cost of operating an EV is equivalent to running a gas-powered car with prices at a whopping \$17.33 per gallon
7. More recent research from the [Seattle-based Recurrent Auto](#) showed that cold temperatures can diminish the total range an EV can get out of a single charge by as much as 35 percent , running an EV during cold weather will drain the battery much faster, thereby shortening the distance an EV can travel on a single charge
8. In April ’23, the Texas House passed a bill to levy a fee on EV drivers to compensate for the reduced revenue from lower consumption of gasoline. So the total cost of an EV includes additional factors.
9. April ’23: Business Insider’s Tim Levin [drove](#) the new Toyota bZ4X electric SUV from New York City to Washington, DC and back, and discovered that he was forced to spend roughly a quarter of his time charging his electric vehicle. But it got worse from there.

“I hit the road back to New York on a chilly morning with 176 miles of range. When I went to turn on the heat, the indicated range plummeted to 125 miles,” Levin wrote.

Therefore, Levin had to make a decision: stay warm and charge twice, or turn off the heat — given the effect that it has on the vehicle’s battery life and range — and deal with the cold. He chose the latter.

Levin said he “bundled up and relied mostly on the seat and steering-wheel warmers” in order to “make things almost bearable.”

There are many more examples. Will these obstacles be overcome? Perhaps. My argument is to let the market decide. Government intervention almost always leads to unintended consequences and higher cost and risk to the consumer.