## Townsend, Erle

From: Mal Carey <malcarey@tidewater.net>
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**To:** DEP Rule Comments

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

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Maine Board of Environmental Protection

(E-Mail) Testimony of Mal Carey Concerning

Proposed California Advanced Clean Cars II Regulations

Maine's approach to climate change

Taken as a whole, Maine's Dirigo-grade Climate initiative is a moral shining North Star, but unless a great deal of the developed world follows us, is an impoverishing folly.

Some parts of Maine's Climate plan make sense in the short term. For instance, Heat Pumps are a "today" means of decarbonization. Even if not subsidized, they do make sense in many situations.

However, considering the next decade, Electric vehicles, present a fraught picture for much of Maine.

We don't have and won't have for a long time the charging infrastructure in much of the State.

We have a cold weather battery efficiency and vehicle heating penalty which is typically not well-described in EV promotion pitches.

Maine's electrical grid and uni-direction dispatch and distribution are not currently adequate to support this new kind of potentially two-way traffic.

A substantial growth of EV and memories of the Ice Storm are not a good night's sleep.

The electrical grid still lacks the surge capacity (via storage, mostly) to match evening domestic power consumption for the usual domestic use and emerging charging demands.

Electric vehicles are not yet contributing, via an equivalent of the gas tax, to road maintenance.

By intent of EV manufacturers, the ability of EV owners to obtain professional repairs at the local, reasonably-priced garage will be practically nil. "Right to Repair" initiatives will help to a degree, but scale-driven base participation costs will make rural repair for EVs both expensive and a transportation nightmare for (single vehicle) owners.

Dealers and private parties in other states will be happy to fulfill the needs of Maine rural drivers for function-fitting gas vehicles. The Commerce Clause of the US Constitution will preempt most State action to interfere with this trade.

EVs will likely dominate the market in 20 years and most of my listed issues will have been adroitly addressed, but today and for some time to come, California's approach will not make practical or economic sense for most of Maine.

We need to make our climate change contributions to the planet in other areas where the costs are lower.