

## Townsend, Erle

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**From:** MrPeteP <mrpetep@fairpoint.net>  
**Sent:** Sunday, February 4, 2024 10:30 PM  
**To:** DEP Rule Comments  
**Subject:** Comment on Chapter 127-A: Advanced Clean Cars II Program

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Main Board of Environmental Protection,

I have a few questions and observations regarding the proposed "Department of Environmental Protection rules: 06-096 Chapter 127-A: Advanced Clean Cars II (ACC II) Program and Chapter 128: Advanced Clean Trucks (ACT) Program" aka "EV (Electric Vehicle) mandate".

I live in Maine, have no stock, grants, subsidies, employment or other similar interest in either EV or hydrocarbon technology.

I strongly urge you to oppose any electric vehicle mandate. Can you please answer these questions, concerns?

People will need new vehicles. 51 percent be forced to buy EVs by model year 2028 and 82 percent by model year 2032 by preventing alternatives from being sold, is that the plan?

How/why were the mandates calculated, why 51% EVs by model year 2028 and 82% EVs by 2023? Show your work please.

Who is invested in and/or gets support from and/or lobbied by the "green energy" industry? Follow the money please.

Are federal tax dollars an incentive to mandate EVs?

Some people have EVs and they are happy with them. I'm glad they are happy. No one else including taxpayers should be subsidizing EVs.

It's a sweetheart deal for the EV industry special interests at the expense of many isn't it?

The US has done a good job reducing air pollution, haven't we passed a point of diminishing returns?

"Maine's electricity generation in 2022 was about half of what it was two decades earlier." - U.S. Energy Information Administration

EVs require charging stations, mandating EVs therefore mandates charging stations and a massive increase in electricity generation.

Where will the power come from to replace gas and diesel powered vehicles with EVs?

How will the power for EVs be distributed? What are the distribution routes?

How do people living off-grid charge their vehicles?

Will there be a massive increase in electric generation, distribution and charging stations in time to meet the EV mandates?

How was the timeline for the electrical infrastructure supporting the EV mandate determined?

Electricity is already extremely expensive, taxes and public debt are both are high. How will the mandate help?

Who will invest in and own increased electric generation and distribution for EVs?

How many kilowatt-hours will EVs will need to replace gas/diesel vehicles?

What is the projected price for electricity with the EV mandate after an increase in electric generation, distribution and charging stations?

Maine is largely rural, what will be the distance between EV charging stations?

Where will charging stations come from, where will they be, who will invest and own them?

Will electricity from charging stations be taxed more per estimated mile than the gas tax to pay for heavier EVs using the roadways?

It's a good thing "emergency vehicles" are exempt. Those are ambulances, fire trucks, etc. That's because EVs would not be as dependable isn't it?

Charging a battery to 80% is a faster rate than charging a battery to 100%. Charging a battery to 100% will shorten the life of the battery.

Are claimed EV ranges based on a batteries with 100% charge?

Battery capacity is reduced in cold temperatures. It gets cold in Maine.

People in Calgary, Alberta with EVs are having trouble, their EVs will only charge half because of cold weather, they are predicting blackouts due to demand.

"People in Chicago abandoned EVs at charging stations because they won't charge in cold weather.

Electric Car Owners Confront a Harsh Foe: Cold Weather

In freezing temperatures, the batteries of electric vehicles can be less efficient and have shorter range, a lesson many Tesla drivers in Chicago learned this week." - NY Times

"Electric vehicle drivers stranded because of cold-weather charging problems

Driver said some of the charging stations weren't working – and those that were working took a lot longer than usual to charge." - CBS News

"Rental giant Hertz dumps EVs, including Teslas, for gas cars" - reuters

Michigan and Wisconsin tried to use electric buses, both attempts failed.

Vehicle cabins need to be heated in cold weather, requiring significant electrical power. Imagine heating a school bus.

How well do EV batteries stand up to snow, ice melt, salt air and flooding on the coast, sub-zero temperatures?

When it's cold out, an EV battery can't be charged, it has to be "preconditioned" (heated) before it will accept a charge, just like my cordless drill.

It takes even longer to charge an EV in cold weather

If an EV battery is deeply discharged, it's no longer usable, it must be replaced.

When it's cold out, does someone at a charging station waiting for the EV battery to precondition then charge just sit in the vehicle for hours with the electric heat on?

EVs are less reliable than gas powered cars according to consumers.

A tank of gas will go farther than a charged battery.

A fuel tank can be filled in much less time than a battery can be charged, will people forced to buy EVs be compensated for lost time?

After a minor accident, EV batteries often have to be scrapped, totaling the entire vehicle.

Since EVs are heavier due to the batteries they cause more damage, are less safe in case of an accident.

EV fires are dangerous, create extreme temperatures, appear to happen due to spontaneous combustion, emit toxic gasses and are difficult to extinguish.

Last year in NY, e-bikes caused 267 fires, causing 18 deaths and 150 injuries in the city.

Expect taxes supporting firefighting and insurance prices to go up due to EVs.

Why are we subsidizing Chinese EV charging stations, EV parts, materials, and Chinese "green energy" products?

We didn't vote to add \$5 Billion in federal tax debt to subsidize charging stations or subsidize EVs but apparently it's been approved.

The authoritarian EV mandate proposal is a step toward the goal of eliminating the petroleum and natural gas industries isn't it?

They are referred to as "zero emission" EVs. Really?

How can EVs, electric generation equipment, distribution infrastructure, charging stations, EVs be produced without any (zero) "emissions"?

Are we to believe materials for EVs, charging stations, etc. will be mined, processed and produced without any hydrocarbon energy?

Oil industry products include plastic to make EVs and chargers, make tires, insulate wire and asphalt for roads.

"ACC II imposes requirements on vehicle manufacturers to produce and sell vehicles in our state that may have higher upfront costs. While there are no direct costs to individuals because of these rules, vehicle manufacturers may choose to pass down costs to consumers." - 06-096 Chapter 127-A Fact Sheet

Well, if "The rules require useful life and warranty provisions" then of course that will result in "higher upfront costs". Is that an inticement to get manufactrers onboard?

"Maine imports gas and diesel fuels, so in theory with the adoption of more electric vehicles, the need for imported fuel would decrease." - 06-096 Chapter 127-A Fact Sheet

Graphite, cobalt, lithium, manganese, nickel, for EV batteries come from foreign mines and refiners. Is the world stable enough to rely on foreign sources?

Where does the slag (and other byproducts) to make EV batteries go after processing?

China gets much of its energy from coal-fired power plants, they make polysilicon, magnets, motors, generators, chargers, etc.

Are there enough CCP controlled cobalt mines using child labor in the Congo to make enough batteries to replace US gas/diesel vehicles with EVs?

China is building many more coal-fired power plants.

Are the strip mines used to make EV battery, magnet, etc. materials zero emission and eco-friendly?

How will EV material be transported across the globe without petroleum fuel?

What will be done with scrap EV batteries, etc. at the end of their useful life?

How can EVs replace gas/diesel powered vehicles without increasing cost while reducing safety, efficiency, standard of living and transportation?

If EVs are so great why do they need mandates, subsidies and tax incentives?

EVs compared to gas

According to available information, 320 miles for \$33.41 (gas) vs 240 miles for \$95.858 (EV), what am I missing?

10 gallons = \$33.41 average price, Maine (gasprices.aaa.com)

10 gallons of gas will go 320 miles when a car gets 32 MPG

That's roughly equivalent to 334 kWh (calculateme.com), at \$0.287 per kWh average (7/15/2023, www.maine.gov) for \$95.858

One 80% EV charge will only provide 180 - 240 miles range - U.S. DEPARTMENT OF TRANSPORTATION (less if it is cold).

A scandal

"The Electric-Vehicle Cheating Scandal

A government rule makes them look nearly seven times as efficient as they are." - Wall Street Journal

"When carmakers test gasoline-powered vehicles for compliance with the Transportation Department's fuel-efficiency rules, they must use real values measured in a laboratory. By contrast, under an Energy Department rule, carmakers can arbitrarily multiply the efficiency of electric cars by 6.67. This means that although a 2022 Tesla Model Y tests at the equivalent of about 65 miles per gallon in a laboratory (roughly the same as a hybrid), it is counted as having an absurdly high compliance value of 430 mpg."

"That scandal, grabbing far fewer headlines, is buried deep in the Federal Register—on page 36,987 of volume 65."

Is an EV mandate really a "routine technical" regulation not subjected to legislative review?

#### Chapter 127-A: ADVANCED CLEAN CARS II PROGRAM

##### "10. Dealer Inspection

The Department or its agents may conduct inspections on any premises owned, operated, used, leased, or rented by any dealer."

Without a warrant? How does that comply with the 4th Amendment?

##### Conclusions

6000 years ago the Sahara desert was tropical. Glaciers as much as several thousand feet thick spread across northern North America and Eurasia during the ice age.

CO2 is a greenhouse gas, greenhouse owners use CO2 generators because CO2 is plant food. Are we expected to believe that the climate will stop changing if an authoritarian EV mandate is enforced and the hydrocarbon-based competition is stopped?

EVs require an authoritarian mandate because people do not want or need them.

Shouldn't electricity used to charge EVs be taxed more per estimated mile than the gas tax to pay for heavier EVs using the roadways?

Some day in the future a viable replacement to gas/diesel powered vehicles may be developed but currently EVs are not universally practical.

If someone wants to buy and drive an EV, fine. Let the people paying for the vehicles decide, not mandated by a few board members or politicians.

If it's a good idea, the transition to EVs will happen without regulations, mandates, subsidies or tax incentives.

It appears that a transition from gas/diesel fuel to EVs will certainly increase cost while reducing safety, efficiency, standard of living and transportation.

It is unconscionable to subsidize the EV industry while attacking the hydrocarbon industry competition.

EVs "Still just an expensive toy" - Buck Throckmorton

I strongly urge you to oppose any electric vehicle mandate.

Thank you for your service to our state,

Sincerely,

Peter Petrowich

Washington, Maine