

Townsend, Erle

From: Robert D. King <rdkingx2@twc.com>
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To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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To the Maine Board of Environmental Protection:

There are many reasons to oppose the Advanced Clean Cars II Program. To begin with, the vaunted “clean cars” aren’t all that clean. It takes the same amount of energy to propel EVs and petroleum-fueled vehicles (PFVs) on the highways, the only difference being that emission-producing combustion occurs in a power plant rather than in the vehicle’s engine. And since most EVs are charged at night, solar contribution to their energy consumption is minimal. In short, calling them “Zero Emission Vehicles” is a lie that would make propaganda master Joseph Goebbels proud.

Another top objection is the crass unfairness to the already-distressed lower half of Maine’s income spectrum. EV buyers, overwhelmingly from the upper income group, and EV manufacturers both receive obscene subsidies, while EV owners pay no highway taxes, which are collected solely from gasoline and diesel fuel sales. Meanwhile, the proposed rule burdens the rest of us with increasingly unaffordable prices for new and used PFVs. Lower income folks will be forced out of owning any car at all. We hear a lot of lecturing about “equity” lately. But where’s there any equity in this?

A further topline objection is the tyranny of an unelected bureaucratic entity being able to impose such a draconian and unpopular mandate without any checks and balances in play. Democratic governments are supposed to represent the will of the people, not the whims of would-be autocrats. In this case, we know that Mainers don’t want these EVs simply by looking at the dismally low sales history. Hence this rule is a radical departure from the democratic and free market norms of this country and of the American concept of freedom generally.

As to the truck component of the proposed rule, truck batteries weigh eight tons each, and up to three of them are required. That’s 24 tons of weight just for the batteries. And keeping a small fleet of such trucks operating could require more electricity than it takes to run the whole city where they’re based. Ridiculous.

Here’s a laundry list of other objections:

- Enormous environmental damage and a human toll resulting from mining the scarce minerals they need.

- The mandate's minuscule and insignificant effects on climate change.
 - Forced reliance on China for production of batteries and other components.
 - National security issues arising from reliance on unfriendly countries for critical minerals & manufacture.
 - Cyber attacks on grid by foreign or domestic bad actors can immobilize all electric transportation.
 - Massive and nightmarish disposal problems when EV batteries (along with solar panels) go dead in 20 years or less.
 - Painfully long time to recharge EVs compared to gassing up a PFV.
 - An EV stranded on highway can't be put back on road with a simple jump start or can of gas.
 - Hazard from fire-prone batteries, such fires being especially fierce.
 - Unsuitability of EVs for long-range trips.
 - Inability of EVs to operate reliably in cold winters (like ours), especially if you have no heated garage with its own charging port.
 - A/C power consumption is same for both types of vehicle, but EVs must consume extra power to heat their interiors in winter – usually by heat pumps.
 - The unrealistically rapid pace of the mandate will overwhelm the electric grid.
 - Pollution from the forced proliferation of many more electric power generation plants.
 - Huge battery weights is also a problem, as EVs increase road and tire wear, use more energy when accelerating and climbing hills, and cause more damage in collisions.
- And many more issues that will surely come to light if this folly is pursued.

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