Townsend, Erle

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

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My name is Steven Woodsum. I am a resident and business owner in Kents Hill, a small village in the town of Readfield Maine.

I am concerned about recent proposals to institute mandatory electric vehicle sales in Maine in the near future. As someone who has given this much thought and who is in favor of protecting the environment from pollution and the harmful effects of human activity I find this solution to be ill conceived.

A simple cost benefit analysis of this proposal reveals that this is not the time nor is it the best path to follow. Allow me to lay out a few positives with regard to EVs and the negatives as I see them.

On the plus side electric vehicles do not burn fossil fuels directly. Therefore there are no tailpipe emitted hydrocarbons entering the atmosphere. That is it. There are no other benefits to electric vehicles, other than to those wealthy enough to invest in companies dedicated to their production.

On the negative side:

*Electric vehicles are very expensive. Even when heavily subsidized by taxpayer dollars they cost much more than highly efficient gas vehicles. This will place an additional burden on the less well to do here in Maine and especially those whose meager earnings depend upon pickup trucks and agricultural equipment.

*EVs are heavier than equivalent-use gas powered vehicles and therefore do more damage to road surfaces. Surfaces that are maintained in part by fuel taxes. Taxes that EVs do not pay.

*EVs are manufactured with far greater quantities of heavy metals and rare earth minerals, very few of which are available in the U.S.A.. The mining of these materials such as nickel, cadmium and cobalt (among others) is one of the great human rights crises of our time, as well as disastrous to a host of environmental sites, such as the nickel mines in Alberta Canada. Irreparable damage to aquifers and local flora and fauna has been done.

* EV batteries themselves must be purchased in large quantities from foreign countries such as China who use those earnings to expand industrial production that is not environmentally regulated. That increase in industrial production is almost exclusively powered by coal burning power plants. And not the highly efficient plants like the ones here in the U.S. but older generation ones. The carbon offset equation does not come out in favor of conversion to EVs.

*Maine has very cold winters. The advertised range of electric cars tends to be calculated under ideal conditions. Very cold weather slows the molecular activity that makes batteries work. Fully charged batteries will last much less time under these conditions. Common commuter distances in Maine will not be possible without stopping for a time consuming recharge. If in fact the needed charging stations can be built, serviced and maintained by the proposed conversion dates.

*EV fires have become very common, such as the fleet of Ford electric trucks that burned for days recently. Battery fires are very difficult to extinguish. Local and municipal fire departments will need to be trained and equipped at enormous expense, once again further burdening the taxpayers. EV fires pour huge quantities of toxins into the atmosphere. Just a few of these fires will exceed the quantity of emissions of thousands of efficient gas burning vehicles.

*End of usable life contingencies have not been adequately discussed or have been altogether ignored. The quantity of toxins, heavy metals and carcinogens resulting from the disposal of " clean energy " systems has the potential for

becoming an environmental nightmare. EV manufacturers as well as solar farm corporations have abdicated all responsibility for this inevitable outcome.

So now is not the time for this change. Much better solutions are on the horizon such as fuel cell technology and hydrogen powered vehicles. To force an ill-conceived mandate on the beleaguered people of Maine would be irresponsible at this time.

Steve Woodsum