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From: russophile64@gmail.com
Sent: Sunday, August 20, 2023 10:33 PM
To: DEP Rule Comments
Subject: Comments Chapter 127-A and Chapter 128

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Hello,

I support the theory that we can have vehicles with zero emissions on our roads. It's a worthy goal. Unfortunately there are numerous issues to deal with as we try to get from here to there. Let's not rush it.

For my comments on this proposal, I'm forwarding a letter I wrote to legislators — Jared Golden, Susan Collins, Angus King and others. It outlines why a push for more EVs will not work for the people of Maine, and elsewhere for that matter. I urge you to reject the above referenced proposal until these issues are worked out.

Thank you.

Johanna S. Billings
Greenville

Sent from my iPhone

Begin forwarded

Dear Rep. Golden:

I have considerable concerns about the movement toward electric vehicles and some ideas which I believe will help mitigate them.

I don't object to the concept of zero-emissions vehicles but rather the lack of government attention to the pitfalls and how they affect the consumer. As I see it, potential problems with EVs include the lack of range, lack of infrastructure such as charging stations, time required for charging, the initial cost to purchase an EV, the cost to install a new EV battery, and the lack of road taxes paid by those who own and drive EVs. I am also concerned about potential mandates such as the one passed in California requiring vehicles with zero emissions by 2035 and policies enacted in 12 other states along those same lines. Most importantly, I fear potential backlash from oil companies as they see their market shares decline significantly. I have detailed these concerns on a separate sheet.

Here are some potential interim solutions. But first, some background: I own a 2014 Chevy Sonic and a 2022 Chevy Spark. The Sonic, which has 180,000 miles on it, has averaged 38 mpg since it was new. The Spark averages 41 mpg locally, though it gets lower mileage on the highway because, frankly, it could use a sixth gear. These cars prove that manufacturers are capable of making vehicles that get decent gas mileage. Both cars, but especially the Sonic, are also fast, maneuverable and can haul a surprising amount of cargo. In fact, as an antique dealer, I use the Sonic as my primary vehicle for hauling purchases including small pieces of furniture.

When I bought the Spark, I really wanted another Sonic but Chevy stopped making them in 2020. The last year for the Spark was 2022. The staff at the dealership from which my husband and I purchased the Spark told us Chevy is discontinuing the small cars because it's more profitable to sell expensive ones. They agreed this is a shame because cars like the Spark offer an affordable alternative to the \$70,000 trucks and SUVs that dominate the roads these days.

So, while we work toward increasing the number of EVs on the road, let's address the consumer need for affordable cars while also addressing the environment. Start by mandating or finding a way to encourage car manufacturers to make vehicles that get, say, at least 30 mpg. Those people who wish to purchase vehicles that get lower mileage are welcome to do so but they should be

assessed an additional fee for each year they own and drive the vehicle. The fee should be based on the gas mileage. The lower the fuel efficiency, the higher the fee. For vehicles that get more than, say, 35 mpg, offer an incentive in the form of an annual tax cut or rebate, available regardless of how you file your taxes and whether or not you owe or get a refund. Increase the amount of these incentives as the mpg for the vehicle in question increases.

People do not need huge, gas guzzling vehicles, even if they have large families who play sports. The belief that they do comes from car company marketing. It's just ridiculous to push a switch to EVs while allowing everyone to drive gas guzzlers in the meantime. Auto manufacturers and government officials must work to overcome the issues I'm outlining with EVs so that the transition from internal combustion engines to electric vehicles can be a smooth one.

Thank you for hearing me out.

Sincerely,

Johanna S. Billings

The Trouble with Electric Vehicles

Lack of Range — According to *Car and Driver*, the 32 electric vehicles with the highest range can travel from 100 to 520 miles on one charge. Only one vehicle has a 520 mile range. The second highest range is 405. Then, ranges drop into the 300-350 range. As an antique dealer living in rural Maine, I can easily put 300 miles on my car in one outing. That gives someone like me only 15 cars to choose from. Not enough.

Lack of chargers and charging speed — At this point, there really aren't enough chargers. Obviously, that has to change. Assuming it does, attention must be paid to charging speed. According to the US Department of Transportation website, EVs require anywhere from 20 minutes to 50 hours to charge from empty, which is what the vehicle would be after a 300-mile trip in rural Maine. So, using myself as an example, if I drive to Augusta and return, it's possible I would not be able to use my EV again for two whole days while it charges, Unacceptable.

Like many Mainers I have family out of state. For me, a trip to see family in Pennsylvania is 600 miles one way. Assuming I have a vehicle capable of charging in 20 minutes and I can immediately access a charger without a wait, I can probably still make the trip in one day. However, it's highly likely that this won't be possible and a one-day trip becomes at least two days, severely cutting into the time I can spend with family during a visit. I'm also wondering if these charging stations will be near eateries and rest rooms, the way gas stations typically are. Or will those needs require yet another stop?

Cost to purchase an EV — As stated previously, *Car and Diver* reports one EV has a range of 520 miles. This is the Lucid Air, with a sticker price of more than \$89,000. The second highest range goes to the Tesla Model S, with a starting price of \$96,000. The third one in the lineup is the Tesla Model 3 at almost \$44,000. Jump down to the Kia EV6, which is 12th on that same list. Its starting price is \$48,500. At #14 is the Hyundai Ioniq 5, starting at \$42,785. Even the last one on the list, a Mazda MX-30, starts at \$36,480 and this one has a range of just 100 miles. In contrast, I paid about \$18,000 for my Sonic and less than \$17,000 for my Spark. Lots of articles report that the cost of owning an EV is less than that of owning a vehicle with an internal combustion engine, but these savings are realized *over time*. Such cost savings do not help someone with limited means to come up with the money necessary to purchase an EV in the first place. Owning a Sonic is still cheaper, even in the long run, than an electric vehicle costing upwards of \$36,000.

Battery replacement cost — According to [greencar.com](https://www.greencar.com), automakers generally provide battery warranties of eight years or 100,000 miles on EVs. When you do need to replace a battery, the cost ranges from \$2,500 for a hybrid to \$20,000 for a Tesla. The website indicates these prices are dropping — let's hope — but, if capitalism has taught us anything, it is that once a company is able to get a certain price for something, it has no incentive to lower the price, even if its costs drop significantly.

At the current prices, it costs more to change the battery in a Tesla than I paid in total for either of my cars. My Sonic is eight years old with nearly 200,000 miles. So, I would have had to replace the battery at least once, maybe twice. Even at the lowest estimate of \$2,500, that's way more than most people can afford. I've probably put \$2,500 to \$3,500 into the car over time but not all at once. I think \$1,000 was the most, when I had to replace the throttle assembly about a year and a half ago.

Taxes — Currently EVs do not pay road taxes because, as I understand it, road taxes are levied at the gas pump and they don't use gasoline. This needs to change, especially in Maine. A simple online search will turn up dozens of articles from reliable media outlets saying EVs are heavier than gasoline/diesel vehicles and cause more wear and tear to the roads than their traditional counterparts. Maine is already in a pickle where road condition is concerned. Don't let this continue

Payback is hell — Let's face it. The oil companies aren't going to just sit back and quietly watch their market share disappear as we switch to EVs. I can't predict what they might do, but I'm certain they aren't going to settle for lower profits. I would expect them to significantly raise prices on home heating oil to make up the shortfall. It's possible they will find another way to recover their losses. Whatever they do, my bet is it won't be good for citizens. You, as legislators, need to work to prevent the problems for consumers that are most definitely coming in one form or another.

Mandates? — Currently, California has mandated that all vehicles have zero emissions by 2035. Another 12 states are at least encouraging something similar and, perhaps, mandates are coming in those states. Please do not allow these kinds of mandates at the federal level until the problems listed above are solved.

We must protect the environment. That is indisputable. But our entire efforts should not be focused only on how individuals get around. Mandate lower emissions for trucks and buses. Crack down on polluting corporations. Offer incentives to bring manufacturing back to the US instead of allowing it to continue in China where pollution runs rampant and affects us all. There is lots to be done. Please do it, but don't aim all your efforts at individuals. That's not sustainable either.

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