

Breton, Mary B

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To: DEP Rule Comments
Subject: Advanced Clean Vehicle - Public comment

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Good morning,

I am submitting my public comment in opposition to the proposed legislation to adopt restrictions on the sale and usage of internal combustion engine (ICE) driven vehicles in favor of electric vehicles (EV).

Maine has several factors that would create a hardship for the populace and create barriers to the full adoption to EVs for private transportation. I will detail these below for your consideration.

1. EV cost of ownership vs ICE for a five year period averages almost \$10,000 more per vehicle which would cause a hardship to the general populace of Maine which lags behind California by more than 10% at \$63,182 for Maine against CA at \$84,097 for median household income.
 - a. Cost of ownership reference: <https://www.nada.org/nada/nada-headlines/beyond-sticker-price-cost-ownership-evs-v-ice-vehicles#:~:text=The%20average%20cost%20of%20an,ICE%20vehicles%20average%20to%20%245%2C707>.
 - b. Median income reference: <https://www.census.gov/quickfacts/fact/table/ME,CA,US/HSG860221>
2. Population density: Maine's population density is significantly less than that of California or other states such as New York or Massachusetts that would have less challenges in implementation of EV conversion. Maine population per square mile is just 44.2 against California's at 253.7. Maine people need to travel much further for work, play, and fulfilling basic human needs such as shopping.
 - a. Reference: <https://www.census.gov/quickfacts/fact/table/ME,CA,US/HSG860221>
3. Environmental factors: Maine is challenged with significantly colder winters which would greatly impact EV charging and efficiency with the current and reasonably foreseeable technology state. California average temperature is 59.4 against Maine at 41 F.
 - a. Reference: <https://www.currentresults.com/Weather/US/average-annual-state-temperatures.php>
4. Charging station availability and infrastructure: California currently has 34,185 charging stations installed for EVs or roughly **1 station for every 4.56 sq miles** of area. Maine currently has just 537 charging ports or roughly **1 station for every 57.47 square miles!** The cost to build out the required infrastructure to facilitate the safe implementation of EVs would be astronomical. Severe winters coupled with lack of charging would equal deaths by exposure to Maine residents during travel, especially in the northern half of the state.
 - a. <https://evadoption.com/ev-charging-stations-statistics/charging-stations-by-state/>

Summary: Maine is not even close to being ready to adopt policies that will be a challenge for even California to achieve. This policy would be downright dangerous to the population of Maine.

Best regards,

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