



August 19, 2023

Department of Environmental Protection  
State of Maine  
Rule Committee  
Augusta, Me

**Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program**

Dear Committee:

It is with extreme concern that I provide the comments and facts against the adoption of California EV standards.

First, I am well versed on the economy of Maine and the Automobile industry. I spent several years researching and writing a book, called "Our Real War: What Happened to America." During Covid, we were one of a very few dealers in the entire state that did NOT take any government money. I helped run our dealership through the General Motors bankruptcy, we were one of just 28 dealers in the nation that prevailed, by the grace of God, in the arbitration process to avert GM's imposed "wind-down". I was here during the Great Northern bankruptcy and closure, which caused 30% unemployment. Through all this, in my almost 30 years of working full time at Katahdin Motors, we have not laid anyone off, or reduced benefits. I've got a Bachelor of Science degree from Husson, and graduated as valedictorian. I know the issues; I know how to do research and the unnecessary adoption of these proposed EV rules will do more harm than good to the people of Maine.

**Reasons NOT to Adopt California EV Auto Requirements:**

1. EV's on average are about \$10,000 or more than a comparable gas model, thereby pricing many people out of buying a new vehicle, thus relegating them to drive older much less efficient models whose efficiency reduces as components wear. Not to mention the increased risk of injury or death in an accident, because of the loss of structural integrity due to rust with age.
2. The cost of an EV to a consumer also requires them to spend \$2000 for a charger, more if their electrical service needs to be upgraded. For the thousands of consumers that rent, home chargers may not be an option. The public charging network, even in states like California, is not as reliable as it needs to be.
3. With an aging vehicle population, that becomes less efficient over time, due to worn components and poor maintenance, it is likely that much of the estimated CO2 reduction will be offset by increased pollution from these older vehicles.
4. In addition to the significant consumer costs, Dealers and Retailers also have significant costs. All manufacturers require dealers to spend up to hundreds of thousands of dollars on special tools and equipment. GM mandates dealers purchase, among other things, special vehicle hoists and a forklift capable of lifting over 4000 lbs. The batteries come in large crates, need special equipment to lift, and are expensive to transport and even more expensive to recycle. There will be retailers and service centers in Maine that will not be able to afford the costs, thereby reducing the number of service points and choices for consumers. The choices that will be left will be significantly more expensive. As an example, in 2020, Maine had 5 Cadillac dealers dispersed throughout the state. After they announced the move to all electric and the associated costs to dealers, 3 dealers sold their franchise back to the factory. Leaving just 2 Cadillac dealers to service thousands of Cadillac customers throughout the state. Making it even harder and more expensive for lower income Mainers to obtain vehicle service. Not to mention the potential loss of jobs.

5. As dealers have started to make necessary upgrades for charging stations, they have discovered that the electrical grid is not sufficient to sustain the necessary electrical load that the chargers require. Upgrades to the lines in front of the dealerships are sometimes required, at an enormous cost to dealers and ultimately the consumer. In talking with power engineers on this subject, they all have informed me that residential neighborhoods will have the same problem when large amounts of consumers, in residential neighborhoods, install level 2 chargers in their homes. This will ultimately involve huge costs to the utilities and ultimately to consumers. Further increasing the burden on lower income Mainers.
6. The thruput of public charging stations is significantly less than the thruput of a traditional gas station. If you are traveling the 5-minute stops to refill, will not happen with EV's, because the charge times, on the very best systems is 30+ minutes for 300-mile range. That can occur in less than 5 at a gas station. These bottle necks will prove expensive and potentially disastrous for the trucking industry. Significantly increasing the cost to consumers for everything. The increased travel time due to charging will cause significant increases in shipping on all goods, including food, will again hit the lowest income Mainers the hardest. Potentially causing shortages and the inability for people to afford bare necessities. Potentially causing severe health consequences, malnutrition, and possibly death.
7. General Motors' own research shows that approximately 20% of EV buyers' next vehicle purchase is NOT an EV.
8. Volkswagen, a company that is transitioning to EV's, research states that it takes approximately 60,000 miles before an EV, due to the massive carbon requirement to manufacture, becomes as clean as a gas-powered vehicle.
9. Approximately 500,000 lbs. of earth must be mined to process the minerals for 1 EV battery. The environmental damage is staggering. Not to mention, it puts China, who is the leader, in rare earth minerals in control of the Auto industry, because they, not the U.S., controls 70% of that industry. (Reuters)
10. EV batteries are very EXPENSIVE and extremely difficult and expensive to recycle. Insurance companies are totaling autos that would be fixable normally, but because it was determined that the battery was potentially damaged, the cost of replacing the battery outweighed the cost of the car. This will lead to significantly higher insurance premiums long term.
11. When EV's are in a crash, they must be towed a very specific way, making any error could increase the risk of the battery going into an uncontrolled thermal event (fire). They must be stored away from other vehicles, because of fire risk. If they do catch on fire, they are almost impossible to extinguish.
12. EV's are much heavier. An EV Silverado weighs over 8,000 lbs. with an approximate 1,300 lbs.-payload capacity, compared to a normal half-ton Silverado that weighs approximately 5,000 lbs. with a payload between 1,750-2,280 lbs. The laws of physics will certainly increase the risk to individuals in older smaller autos, increasing the likelihood of death in a crash.
13. Maine's extreme climate limits the feasibility of EVs. EVs suffer from extreme loss of range in cold winter climates, as much as a 100 mile or more reduction. EV makers suggest using heated seats to keep warm instead of warming the cabin of the vehicle. Many auto makers (BMW is one) now charge a monthly subscription fee for the use of heated Seats. GM Stated that it expects to generate over \$20 billion in revenue on subscription fees alone (GM said it was not going to charge a subscription for heated seats).
14. Maine's rural topography reduces the ability for many people to safely use EVs. Great Northern Paper alone had 3,000 miles of woods roads. These roads are still in use today, by loggers, foresters, rangers, game wardens, hunters, campers and more. Due to the remote location of these roads, there will never be sufficient infrastructure for charging. Thereby increasing the likelihood of people, including STATE EMPOLYEES of freezing to death in the winter due to severely limited range.
15. As more and more homes transition to heat pumps and other NON carbon forms of heat, there is a significantly higher burden on the electric grid. A rapid, forced transition to EVs on top of the existing increased electric demands, will cause problems like California has today. Several times a year, California issues "Do Not Charge" orders for EV owners, because their grid does not have enough production or capacity to heat/cool homes and charge cars. Maine, in the winter, will be worse.
16. The increased levels of CO2 in the atmosphere have, according to NASA, contributed to a "greening of the earth." Plants need CO2 to survive. When levels get below 120 ppm, they die, the optimal level is between 1,000 and 2000 ppm. There have been at least 2 times in the earth's history when CO2 levels went up and temperatures went down. (Dr. Patrick Moore)

17. There are many other factors that contribute to climate change, solar activity, earth's rotation, volcanic activity, and natural cycles that are minimized by the science community. As an example, a volcanic eruption of Tambora caused the year without a summer in 1816. This years under water volcanic eruption near Tonga, emitted about 146 tera tons of water vapor in to the stratosphere (equal to 10% of the water already in the atmospheric layer), and is a contributing factor to this year's weather anomalies. Water vapor is comprises the most abundant of all the greenhouse gasses.
18. There is evidence of significant glacial activity all over Maine. I can personally show people some of this evidence. Why did the glaciers melt? 10,000-20,000 years ago, Maine had glaciers, why did they melt? It was not because of automobiles.
19. Why did we have a Mid-Evil and Roman warm period? The Mid-Evil warm period was followed by the Little Ice Age, which ended shortly before the industrial revolution.
20. Temperatures were rising several decades before the industrial revolution.
21. Forced migration to EVs will ultimately cost consumers nationwide hundreds of billions of dollars that could be better used in other places to improve the lives of lower income people.

I am attaching some links to some credible sources that acknowledge climate change, but clearly show it isn't the existential crisis that it is claimed to be. We should make judicious use of our materials and resources, but picking an arbitrary date, to force consumers to switch to EVs, is irresponsible. The market is naturally shifting to cleaner forms of transportation. Doing so faster than the electrical infrastructure and consumer's ability to afford the transition will be disastrous and potentially deadly. I urge you to not follow California's ill-chosen path.

**Dr Patrick Moore, Co-founder of Greenpeace Canada:**

[https://www.amazon.com/Fake-Invisible-Catastrophes-Threats-Doom/dp/B08TFYJFMR/ref=sr\\_1\\_1?crid=O9Q97TE4YJHT&keywords=dr+patrick+moore&qid=1692289199&srefix=dr+patrick+moore%2Caps%2C322&sr=8-1](https://www.amazon.com/Fake-Invisible-Catastrophes-Threats-Doom/dp/B08TFYJFMR/ref=sr_1_1?crid=O9Q97TE4YJHT&keywords=dr+patrick+moore&qid=1692289199&srefix=dr+patrick+moore%2Caps%2C322&sr=8-1)

**Bjorn Lombog: former director of the Danish government's Environmental Assessment Institute:**

[https://www.amazon.com/False-Alarm-Climate-Change-Trillions/dp/B08BLW7RNV/ref=sr\\_1\\_2?crid=QYWAPHGIMBZC&keywords=bjorn+lomborg+books&qid=1692289236&srefix=bjor%2Caps%2C493&sr=8-2](https://www.amazon.com/False-Alarm-Climate-Change-Trillions/dp/B08BLW7RNV/ref=sr_1_2?crid=QYWAPHGIMBZC&keywords=bjorn+lomborg+books&qid=1692289236&srefix=bjor%2Caps%2C493&sr=8-2)

**John Stossel: consumer journalist:**

Electric Cars Inconvenient facts 1:

<https://www.youtube.com/watch?v=z2HneqfZGsM>

Electric Cars Inconvenient facts 2:

<https://www.youtube.com/watch?v=ptl6BRVC1Kw>

Judith Curry: How Science Got Hijacked by Alarmists

<https://www.youtube.com/watch?v=vVi01vJ4nxM>

Sincerely,

**Michael J. Murphy**  
Vice-president