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From: trian@twc.com
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To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program

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To members of the Bureau of Environmental Protection and Ms. Lynne Cayting:

My name is Peter Triandafillou and I am a retired forester living in Orono, Maine. I am submitting this letter in opposition to adoption of California's Advanced Clean Cars II (ACC II) rules as presented on the DEP website.

There are several reasons not to adopt automobile EV mandates. Maine is not anything like California. Compared to California, Maine's economy is very small, and we are much less wealthy. It is unlikely that policies that may or may not work for California will work for Maine. Maine has a dispersed and rural population and work environment. People often commute long distances for work and life's necessities. They do not as a rule have access to high output charging stations or the wealth to purchase an EV. It is unlikely that the infrastructure can be built out in a time frame that fits these rules.

According to the Bangor Daily News, EVs were 6% of auto sales in Maine in 2022. The ACC II rules mandate 43% EV sales in 2027. Is this remotely realistic? We are needlessly setting ourselves up for failure by adopting unreasonable mandates. Instead, we should promote market-based solutions rather than mandate certain technologies. Converting half the auto fleet to hybrid platforms or natural gas may very well be more effective than converting a smaller portion of the fleet to EVs. Neither of those options require building out expensive charging infrastructure. We do not know the answer to that question at this time, but by adopting these rules, we will have effectively forced the answer. I don't think that makes much sense.

Electrifying the auto fleet in Maine represents a colossal investment in the mining and processing of lithium and other uncommon minerals. Is the environmental cost of this change a rational alternative to current technology?

Like much of the country, Maine's power grid is fragile. Electrifying the automobile fleets is like adding hundreds of thousands of homes on the grid. Nowhere in these proposals do I see concrete plans for the billions of dollars of investment needed to upgrade and expand our grid and the available power on the grid. Without such an investment, mandating EV sales is a fantasy.

The cost of living and doing business in Maine is very high and getting higher. In particular, the cost of energy and transportation in Maine is already uncompetitively high. Adopting the ACC II rules will only make this situation worse. We do not have the wealth to blindly follow California's lead.

This may be a comment borne of ignorance, but I notice on your website that the proposed rules are "Routine Technical." Mandating the electrification of our auto fleet is anything but routine and technical. This is a hugely substantive proposal.

I urge you to reject adoption of the ACC II rules. We are much better served by exploring our own market based solutions that accomplish similar goals at lower cost and without upending our economy and power grid.

Thank you for your time.

Peter Triandafillou