

**Breton, Mary B**

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**From:** Kevin King <KevinK@promptoil.com>  
**Sent:** Monday, August 28, 2023 11:34 AM  
**To:** DEP Rule Comments  
**Subject:** Comment on Chapter 128: Advanced Clean Trucks Program

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E-mail

Kevin A. King  
27 River Road  
Windham, Maine 04062

August 28, 2023

**PUBLIC COMMENT**

**REFERENCE: Adoption of California-style EV Mandates.**

THE BILL MAY BE: §585-D. New motor vehicle emission standards Subject to the provisions of this section, the board may adopt and enforce standards that meet the requirements of the federal Clean Air Act, Section 177, 42 United States Code, Section 7507 relating to control of emissions from new motor vehicles or new motor vehicle engines. These standards, known as a "low-emission vehicle program," must be designed to prevent air pollution and achieve and maintain ambient air quality standards within the State. [PL 2005, c. 245, §1 (AMD)].

While I strongly agree that there is a place for Electric Vehicles in the Maine Automotive Structure, I strongly disagree with any bill that mandates their use. Maine's overall contribution to World Pollution, when you consider our forests, is almost non-existent. The goal to reduce all Greenhouse Gases is admirable, but the very geography that benefits the environment also makes the adoption of the proposed standards difficult.

My Reasons are as follows:

1. I believe in Toyota's 1:6:90 Rule (Case for Hybrid) as well as Toyota's focus on the Hydrogen Combustion Fuel Engine with 0% Emissions. The Proposal would eliminate a Hydrogen based combustion engine, likely the real long-term solution to replace fossil fuels.
2. Electric Vehicles energy source remains 80% Carbon Fuels moving a diverse energy market to a centralized system, requiring huge investments in Utility Transmission and Electricity Fossil Fuel Production.
3. Electric Vehicle will require a huge investment in Charging Stations throughout a geographically enormous State.
4. The Precious Metals needed to build an electric battery in sufficient quantities requires substantial mining and possible damage to the Environment. In Maine Iridium Mining is banned even though we have this mineral in 'Maine forcing the use of Third World Mining in terrible mining conditions.
5. Solar Based Electric Infrastructure is not reliable or cost effective in Maine where forests must be demolished to put up sufficient solar panels for the needs of 100% electrical production.
6. Solar Panels Projects in Maine are subsidized by higher electric rates thereby driving up the costs of electric vehicles and reducing Maine disposable income.
7. Hybrid Vehicles give balance to the goal between cost and results. In a disaster, the Hybris Car could support minimal electric needs in a disaster.
8. The real cost of EV's are not publicly known as the assumption that the electricity needs of an EV have 0% fossil fuel impact.
9. The electricity needed for Maine EV system will rely on Solar and Wind, but mostly New Nuclear infrastructure. The previous Nuclear Infrastructure was dismantled in Maine once before. Any EV mandate MUST be tied to New Nuclear development.
10. Any collapse in the Maine Electric Grid, even temporary (Ice Store of 1998) would be a disaster for Maine's citizen's. It forces Maine residents into home generators, at far greater pollution.

In Summary: The question of Carbon Fuels and Emissions is a complicated issue. Like the Florescent Lightbulb, initially mandated to replace incandescent light bulbs, it ignored future competing technologies like the LED lightbulb as a possible solution as well as the effect that Mercury might have in the environment. That adoption has placed millions of mercury lightbulbs in landfills creating a new environmental nightmare. I think awareness of what each person can do to reduce our own greenhouse footprint would have a much greater effect. The use of Gas/Electric Hybrids is thew future over the next 20-30 years.

In the case of EV's, infrastructure, affordability, and critical mineral supply need to catch up to the ambitions that many environmentalists aspire in looking to de-carbonize the Country.

Respectfully submitted,

*Kevin A. King*

Kevin A. King  
Tel 207-318-7568

Toyota's 1:6:90 Rule (Case for Hybrid): The cost of one long-range battery electric vehicle could instead be used to make 6 plug-in hybrids or 90 hybrid vehicles. The overall carbon reduction of those 90 hybrid vehicles over their lifetimes is 37 times greater than a single battery electric vehicle