

27 Millstone Rd.
Harpwell, ME. 04079
August 22, 2023

Maine Department of Environmental Protection
28 Tyson Dr. 17 State House Station
Augusta, ME. 04333

To Whom It May Concern:

I am writing in opposition to a proposed rule by the Natural Resources Council of Maine that would require 43% of new vehicles sold in Maine to be zero emission by the 2027 model year, increasing to 82% by 2032. While I absolutely agree that the climate crisis requires urgent attention and that any number of activities involving fossil fuels must change, I see this proposal as an example of green-washing whose harm would outweigh its good. I have many concerns about current EVs:

- Their additional weight generates more pollution from their brakes and tire emissions than comparable fossil fuel-powered vehicles. Although this type of pollution is almost entirely overlooked, the health and environmental consequences are real and considerable;
- The supply chain challenges we have experienced to date are minor compared to those in our future and mandates such as the proposed that increase American dependence on foreign materials are short-sighted;
- Current batteries require rare elements in finite supply, largely outside the United States (although we do have that large lithium deposit in Maine and if this rule were approved, to be philosophically consistent this deposit would be allowed to be mined, hopefully in an environmentally responsible manner). Moreover, these necessary rare elements are often mined internationally with exploited human labor and few if any environmental safeguards. One of the things that distresses me most about many environmental efforts in the United States is a blasé attitude about severe correlated environmental impact displaced to other places in the world. *We are one planet...*
- I am concerned about environmentally sound disposal of exhausted EV batteries.
- This rule would have a disproportionately negative impact on lower income citizens.

I am also not advocating that we do nothing.

1. One change that would be very appropriate, and at least as unpopular as the proposed rule, even with me, would be to advocate for a lowering of the highway speed limit to 55. Not only would that ensure considerable progress on emissions, but more lives would be saved and more money on fuel would be saved. This is an example of a simple, environmentally correct action.
2. Another unpopular action, also with disproportionate impact on lower income citizens, would be to increase the tax on fuel to accurately represent the precious resource that it is, encouraging multi-destination use of personal vehicles and use of public transportation.
3. A third appropriate action would be to work hard to increase viable rural public transportation.
4. I am concerned that so much money and attention is being spent on mitigating the climate impact of personal transportation. Yes, it is a significant negative environmental impact, but it is dwarfed by such things as transporting goods, the increasing personal jet fleet and industrial emissions. Our economy is predicated on us all buying *stuff*. Although it is necessary to reduce this consumerism, and will happen voluntarily or involuntarily, it will create economic distress

and accompanying social/political upheaval. Attention and resources toward creating a softer landing on that inevitable culture change would be appreciated.

5. I would also like to see more research money directed to developing geothermal energy, which is posited to be unlimited and is equally distributed around the globe.
6. There is no plausible way out of our environmental crisis, absent a total collapse of lifestyle, without increasing the use of nuclear energy. I hate it. I hate that our country spent billions developing a safe storage disposal site and are not using it. Moving forward in an environmentally safe manner as possible would be a good use of NRCM and EPA resources.

Finally, civilization as we know it is dependent on four petroleum-based products: Concrete, Ammonia (fertilizer), Steel and Plastics. While we remain dependent on these products, every barrel of oil refined results in more than 30% gasoline. What are we going to do with the gasoline? It has to be disposed of in some way – there is no way presently to avoid creating it when oil is refined. Thus my concern that the proposed rule wastes political capital and moves emission goals incrementally when good will, energy, money and effort could be better spent on other goals.

Sincerely,



Elizabeth Bailey

cc: Natural Resources Council of Maine