

## Breton, Mary B

---

**From:** Sue Butler <sbutler202@outlook.com>  
**Sent:** Friday, August 25, 2023 8:28 AM  
**To:** DEP Rule Comments  
**Subject:** Electric Vehicle rule changes

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

I think in a capitalistic society, which this country still is, consumers should be able to have choices. I also think that we naively believe that one size fits all when we know or discover as adults that that is actually seldom true. Everyone going all in on electric at this point in time is ill-conceived and wishful thinking. California prides itself on idealized policies that they "hope" and "pray" will work out. Look at how well that is working out. Mainers are a more pragmatic bunch. We recognize that policies based on theoretical optimism are much less sound than those based on practical, reasonable realism. We would like our government leaders from every party to honor this pragmatism while still building what is needed to obtain desired goals. But please don't throw the baby out with the bath water.

So I believe that the State of Maine should do what it can to INCENTIVIZE EV usage, but to NOT mandate it.

There are many differences between the State of Maine and the State of California whom we, or at least some of we, seemingly wish to emulate. The weather, terrain, and life-styles are almost polar opposites. California home median value is double Maines. Its income is nearly 25 % higher. California's median income over \$200K doubles that of Mainers earning over \$200K. Climate couldn't be more different for where people tend to live. States are States for good reason; so that they can govern according to the will of the people who reside there. Please govern according to the will of Mainers. Please govern according to the realities of Maine vice California. Please govern in a manner that provides for a free and democratic society with mandates only for what is truly needed. We are jumping to mandates for everything. It is tiring. There has to be other mechanisms to use.

EVs are notoriously challenged in very cold weather. A large portion of the Maine population can ill-afford a change to mandated EVs from both a financial and practical perspective. Estimates vary, but according to a study from AAA, EVs can lose about 40% of their range when the temperature drops from 75 degrees to 20 degrees Fahrenheit, assuming people put their car heaters on ... which is a good assumption in Maine. In rural communities, this can be diastorous and dangerous since they could easily get stuck out in the middle of nowhere. In more populated communities, those who have a commute could also be in a world of hurt.

It is impractical to mandate a change to something for which the infrastructure is not sufficient to support that mandate. Mandating itself becomes government overreach as the more that gets mandated the less like a free and democratic society we remain.

There is also the blind eye to how the components / metals / materials are "harvested". Mandating EVs to help lessen environmental impacts is a bit of an oxymoron. It simply changes the type and location of those impacts. We have not, as a society, recognized our role in worsening the lives of children and adults in far away places. To mandate is to embrace child and human slavery and abuses. It is an unethical mandate as mining is routinely associated with human rights abuses and environmental degradation. We like to pretend that robbing Peter to pay Paul is somehow the better course of action, mostly because we "benefit" from the perceived gains.

My recommendation is to enhance incentives and to build the infrastructure. Once that is done, then more and more people will willing look at EVs as the better option. But the State of Maine and USA for that matter, also needs to come grips with the whole logistics chain so that we do not add to world suffering and environmental destruction elsewhere for our benefit. We need to look at changes in society that might be needed to reduce issues caused by lithium battery malfunction (garage and car fires). While the risk of fire from EVs is less than gas engines, the level of damage they do because of the difficulty in containing the fire is by far greater. But there may need to be collateral policy changes. For

example, are there new building codes that need to be established to better seal off garage fires from the house? Is there a retrofit approach for existing garages? Do firefighters need specialized training to deal with EV battery use? Etc

And we need to look at end of life issues. Where and how to dispose of EV batteries and vehicles? These are toxic components which also have environmental impact. Optimizing one small part of the logistics chain does nothing other than to make a small but vocal group "feel better", and feel "proactive". In reality, it is unlikely to lead to desired outcomes, and will create new just as challenging environmental issues.

Thank you for the opportunity to provide input to these issues.

Sue Butler, Wells ME