

My name is Susan Wiswell and I live in Kittery. I am writing to oppose limiting the sale of gasoline-powered vehicles in Maine.

The changes proposed by three environmental groups to the regulatory codes are much more substantive than mere routine technical changes and should therefore require legislative action. Only 150 petition signatures were required to be submitted to the Maine Board of Environmental Protection to initiate rule making; over 10,000 signatures were submitted in opposition; and over 1.3 million Maine residents will be affected by the ruling. That should require a roll call vote by our elected representatives.

Electric vehicles are clearly unpopular in Maine, accounting for only 6% of new vehicle sales, and these proposed changes would require that to increase to 43% by 2027 and 82% by 2032 – totally unrealistic expectations. Although the proposed rules would require a state review in 2029, it is highly unlikely that there will be enough demand, enough charging stations, or significant improvements to the electric grid to enable it to handle the increased demand for electricity to charge these vehicles, especially with the current trend to replace fossil fuels with less efficient renewable energy sources for powering the grid. Ensuring a robust supply chain for the rare earth materials used in manufacturing EV batteries and the environmental impact of disposal or recycling of used batteries must also be considered.

Maine is a much poorer and colder state than is California, and they are having rolling blackouts. We do not want that here! Electric vehicles are more expensive to purchase than are ICE vehicles, and mandates to increase the share of new EVs would distort the market, driving up the cost of used ICE vehicles. Those EVs that are designed to be more affordable have smaller battery packs, which decrease their range per charge. They must be charged regularly, incurring costs for installation of home charging stations (where they can be installed) and additional electricity usage. Our electric bills are already unaffordable, our grid is old and overburdened, and many rural areas of the state lack the infrastructure for EV charging stations.

Cold temperatures cause EV batteries to charge more slowly and decrease their driving range. A 2018 study by Motoaki, et. al., using the 2012 Nissan Leaf as taxis in New York City showed significant deterioration in direct current fast charging (DCFC) rates in cold temperatures. Recurrent Auto (2022) tested 7000 EVs, 13 different models, and found a decrease in driving range of 8%-35% at 20-30 degrees compared to 70 degrees due to slowed chemical and physical reactions in the battery and less heat generated by the motor requiring the cabin heater to draw from the battery.

Maine's economy, infrastructure, climate (both physical and political), and geography make limiting the sale of gasoline-powered vehicles in favor of electric vehicles an excessive regulatory burden on Maine's residents. I urge you to reject it.

<https://www.portlandpressherald.com/2023/08/17/proposed-clean-car-and-truck-mandate-draws>

<https://www.themainewire.com/2023/08/public-hearing-on-california-style-rules-to-limit-gas-powered>

<https://www.sciencedirect.com/science/article/abs/pii/S0301421518304828> (Motoaki, et. al.)

<https://www.recurrentauto.com/research/winter-ev-range-loss>