November 7, 2023

New Mexico Environmental Improvement Board

Attn: Pamela Jones, Board Administrator

P.O. Box 5469

Santa Fe, NM 87502

Albuquerque/Bernalillo County Air Quality Control Board

P.O. Box 1293

Albuquerque, NM 87103

Re: EIB 23-56 (R)

Dear Respective Board members, As President of the Union County Farm & Livestock Bureau, I am writing to express my concerns regarding the Clean Car II rules. Union County Farm & Livestock Bureau represents members involved in all aspects of agriculture including farming, ranching, and value-added/processing, who are often located in rural areas. Our county board works to promote and protect agriculture at the local level while providing a voice for rural communities. As the voice of agriculture in Union County, we respectfully request that you and the entire Environmental Improvement Board (EIB) vote **NO** on Docket Number EIB 23-56 (R). EIB 23-56 (R), known as the Advanced Clean Cars and Trucks Rules, will impose an unnecessary burden on the people, farmers, and ranchers of New Mexico.

New Mexico farmers, ranchers, and agribusiness owners are aware of the environmental effects emissions can create and have worked hard over the years to reduce our footprint. As some of the most seasoned stewards of the land, our state’s agricultural producers work diligently to ensure the land, air, and water are cared for. Natural resource stewardship is a cornerstone of farms and ranches as our producer's viability directly depends on upon them.

Union County Farm & Livestock Bureau opposes these rules for the following reasons:

* The rules establish extreme goals. These rules are going TOO FAR TOO FAST and NM will not be able to keep up.
* The rules entirely disregard the long distances perishable agricultural products are required to travel to market.
* Infrastructure statewide is ill-prepared to handle the expected demand caused by the conversion of thousands of vehicles.
  + Additionally, there continues to be a lack of infrastructure available statewide to support and serve our rural communities.
* The rules lack flexibility.
* Agricultural producers, rural businesses, and workers have been hit hard by the recent economic challenges including inflation, and new regulations might add more stress to already struggling communities.
* There has not been a robust public engagement process on the rules that will impact New Mexicans statewide.
  + Only three public meetings were held on the Clean Car II Rules, two of which were hosted in Albuquerque. Our rural residents, those who will likely be most impacted by these rules, have been ignored and bypassed during this process.

As a practicing steward of our natural resources, I believe it's essential for us to find a balance between protecting the environment and supporting our local economy. I urge you to consider the potential negative impacts these rules may have on our agricultural producers and rural communities.

I appreciate the opportunity to comment on the proposed rules, and I hope we can find a collective solution that helps our environment and supports New Mexico agriculture.

Respectfully,

Kim Miller

President

Union County Farm & Livestock Bureau