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September 26, 2023

The New Mexico Environmental Improvement Board
1190 St. Francis Drive, Suite N4050
Santa Fe, NM 87505

Albuquerque-Bernalillo County Air Quality Control Board
P. O. Box 1293
Albuquerque, NM 87103

RE: Santa Fe County Board of County Commissioners' Support for Advanced Clean Cars II and Advanced Clean Trucks Standards

Dear Board Members:

The Santa Fe County (County) Board of County Commissioners supports the adoption of the New Mexico Environment Department's (NMED) proposed standards to facilitate the transition to zero emission vehicles. We support the adoption of Advanced Clean Cars II and Advanced Clean Trucks rules. The Board of County Commissioners provides the following comments in response to the proposed amendments to 20.2.91 NMAC, which would update New Mexico's standards to align with the standards of California for low-emission and zero-emission vehicles. We appreciate the opportunity to provide comments as the issue of climate change is of vital importance to the County.

The emissions of greenhouse gases from human activities threatens ecological stability and human well-being. Per the U.S. Energy Information Administration, the transportation sector in particular is the largest anthropogenic source of carbon dioxide emissions in the United States and the second largest source in New Mexico according to the NMED. The proposed amendments to 20.2.91 NMAC will move us toward low-and zero-emission vehicles, proving beneficial to long-term public health as well as to the environment and climate. The Board of County Commissioners adopted [Resolution No. 2017-68](#), which expressed its intent to support greenhouse gas emission reduction within the County and the community in order meet the targets set forth in the Paris Climate Accords to limit global mean temperature increase. This is also in line with New Mexico's objective, as stated in [Executive Order 2019-003](#), to achieve a statewide reduction in greenhouse gas emissions of at least 45% by 2030 as compared to 2005 levels. The proposed amendments to 20.2.91 NMAC would ensure New Mexico continues on the path to meet these goals. These amendments have the potential to:

- Deliver more affordable transportation options for New Mexicans and protect our health by reducing health- and climate-damaging pollution.
- Transform the entire freight industry to reduce pollution harm to our communities and create high-quality green jobs by requiring that vehicle manufacturers sell an increasing percentage of new zero-emission trucks, vans, and buses through 2035.
- Make deep cuts in harmful tailpipe pollution that will save lives and make our households, businesses, and economy less dependent on dirty, volatile, and costly gasoline that damages our climate.
- Give the state a clear, certain path forward to a clean transportation future.

These standards reduce air pollution and will require auto and truck manufacturers to deliver an increasing number of zero-emission electric vehicles (EV) and plug-in hybrid vehicles for sale. The standards have the potential to create jobs, address climate change, and make EVs more accessible in New Mexico. [A study from the Natural Resources Defense Council \(NRDC\) and Sierra Club](#) shows that New Mexicans could receive up to \$44 billion in public and climate benefits, thousands in cost savings for vehicle owners, and utility savings by 2050.

The proposed amendments may also improve equity. Reducing tailpipe pollution from trucks may protect public health, particularly in low-income communities that live closest to transportation routes in New Mexico. The Advanced Clean Trucks standard proposes to hold trucking companies accountable for the pollution impacting New Mexicans' health. Expanding affordability is also one of the goals of these new standards. EVs may cost less to own and operate, relieving New Mexicans from volatile gas prices and lowering household costs. Advanced Clean Cars standards aim to bring these much-needed benefits to New Mexicans.

A \$35 million federal grant is allowing New Mexico to install charging stations every 50 miles along New Mexico's interstates, and the next phase would place chargers along roads in rural and tribal areas. Thanks to 2021 New Mexico infrastructure legislation, utilities are installing public chargers in key locations across their service areas and providing significant rebates for electrical upgrades and home chargers, with higher rebates of thousands of dollars for lower-income ratepayers. Car buyers can also take advantage of up to \$7,500 in upfront federal incentives to buy an EV. These incentives can be used to decrease the purchase price and do not require a buyer to receive a tax credit. Some other positive incentives include:

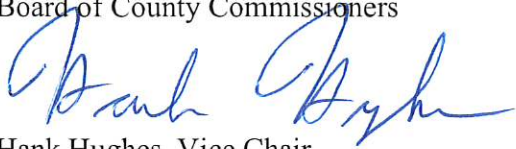
- The Clean Car Standard may force automakers to make better cars with longer ranges through technology standards.
- EVs are continuously extending their range, with the longest now exceeding 500 miles.
- People who can charge their EV at home overnight very rarely need to use a public charger.
- Chargers are rapidly growing in availability, and the charging speed is improving.
- Plug-in hybrids are also supported in these standards and may be a great solution for those taking longer drives; they use the electric battery for the first 30 to 50 miles before switching to gas.
- Most people with plug-in hybrids rarely need to use gas because daily driving tends to be less than 30 miles.
- Adding more EVs on the road may decrease electric rates, saving households and businesses money - even if they don't own an EV.

In addition to helping Santa Fe County meet its greenhouse gas reduction goals, the rules may provide for cleaner air along our major transportation corridors, resulting in health benefits to the citizens of our County. The new rules will also facilitate the transition of the County fleet of vehicles to zero-emission vehicles by making a variety of vehicles available in New Mexico.

Respectfully,



Anna Hansen, Chair
Board of County Commissioners



Hank Hughes, Vice Chair
Board of County Commissioners