



November 14, 2023

New Mexico Environmental Improvement Board  
Harold L. Runnels Building  
1190 St. Francis Drive, Suite N4050  
Santa Fe, New Mexico 87505  
% Pamela.Jones@env.nm.gov

**Clean Transportation  
Technologies and Solutions**

[www.calstart.org](http://www.calstart.org)

Albuquerque/Bernalillo County Air Quality Control Board  
Environmental Health Department  
1 Civic Plaza NW - 3rd Floor, Room 3023  
Albuquerque, NM 87102

## **RE: CALSTART Supports New Mexico's Adoption of Advanced Clean Cars & Trucks Standards**

Dear Members of the New Mexico Environmental Improvement Board and Members and Commissioners of the Albuquerque/Bernalillo County Air Quality Control Board,

CALSTART is pleased to support New Mexico's consideration and hopeful adoption of Advanced Clean Cars II (ACC II). CALSTART works with industry to bring about conducive conditions for zero-emission transportation to flourish and it is our view that zero-emission vehicle (ZEV) sales requirements, supported by purchase incentives<sup>1</sup> and robust infrastructure programs<sup>2</sup> are critical to bring about a smooth and cost-efficient transition for zero-emission passenger vehicles. By adopting the ACC II regulations, New Mexico is taking an important step to achieve an ambitious net-zero transformation of on-road transportation.

For more than 30 years, it's been CALSTART's mission to develop, assess, and implement large-scale zero-emission transportation solutions to mitigate climate change and support economic growth. CALSTART works with businesses, organizations, governments, and communities to create real-life impacts towards clean air and equitable access to clean transportation for all. CALSTART provides scientific, technical, and policy support for governments on all levels for regulatory development and clean technology and infrastructure acceleration. CALSTART members include Ford Motor Company, General Motors, Tesla Motors, Rivian, Audi of America, VinFast, ChargePoint, EVGo, Shell ReCharge Solutions, bp pulse, Blink Charging, ABB, and Siemens, among others.<sup>3</sup>

This regulation represents a historic step in transitioning the automotive industry toward a significant increase in sales of ZEVs. The effort to implement ACC II will result in New Mexico communities seeing reductions in tailpipe emissions and increasing the number and quality of light-duty ZEVs and plug-in hybrid electric vehicles (PHEVs) on the road. Further, a ZEV sales requirement would increase the stock of used ZEVs in New Mexico

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<sup>1</sup> <https://www.epelectric.com/renewables-tech/electric-vehicles/buying-an-ev/incentives-in-new-mexico>

<sup>2</sup> <https://www.dot.nm.gov/nevi/#::~:~:text=New%20Mexico%20is%20allocated%20%245.6,traffic%20control%20devices%20and%20signs.>

<sup>3</sup>Our comments are informed not only by the technical expertise of our staff, but also the insights of many of our members and partners in the light-duty vehicle industry. Our comments, however, reflect the views of CALSTART alone and do not represent consensus across these listed members or our broader membership.

O F F I C E S I N :

48 S. Chester Ave PASADENA, CA 91106 | 1607 Cole Blvd. LAKEWOOD, CO 80401 | 67 35<sup>th</sup> St. 5<sup>th</sup> floor Ste B508 BROOKLYN, NY 11232 | 2600 Tenth Street, Suite 407, BERKELEY, CA 94710 | 200 E. Big Beaver TROY, MI 48083 | 168 Smolian Circle, SANTA ROSA BEACH, FL 32459



more quickly, expanding more equitable access to clean transportation options, particularly to communities disproportionately burdened by transportation pollution.

The adoption of the ACC II regulation is not happening in isolation. The automotive industry has committed to expanding ZEV offerings and many automakers are already on a roadmap to transitioning to 100% ZEVs by 2035. Providing market certainty through a sales requirement unlocks greater deployment of capital, as evidenced by the \$100+ billion worth of announced sector investments within the past two years. Commensurately, as battery and vehicle production achieve greater economies of scale, ZEV cost declines are expected. Projections show ZEVs reaching purchase cost parity with internal combustion engine (ICE) vehicles by the mid to late 2020's, after which they are projected to further decline in cost, saving money for all consumers, with particular benefit for low-income consumers.

Thank you for the opportunity to provide comments on this important regulation. If you have any questions or comments, please contact me at [aburger@calstart.org](mailto:aburger@calstart.org).

Sincerely,

A handwritten signature in black ink that reads "Alissa Louise Burger".

Alissa Burger  
Regional Policy Director, CALSTART  
[aburger@calstart.org](mailto:aburger@calstart.org)