

November 1, 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 Sandoval County Farm & Livestock Bureau, I am writing to express my concerns regarding the Clean Car II rules. Sandoval County Farm & Livestock Bureau represents members involved in all aspects of agriculture including farming, ranching, and value-added/processing. Sandoval County farmers and ranchers come from a long and diverse cultural background where agricultural has been an integral part of their families lives both in the past and currently. 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 Sandoval 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.

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

- The rules establish extreme goals without consideration of the impacts to some of the lowest income and rural residents of our state.
  - o Our residents travel nearly 80 miles to Albuquerque or 100 plus miles to Farmington to buy groceries, go to jobs, attend medical appointments, and do laundry.
  - o They travel 30-50 miles to get mail and buy fuel.
- 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.
  - o Specifically, many of the rural communities in Sandoval County still lack electrical infrastructure and basic needs.
  - o Many residents still have to travel in excess of 10 miles of dirt road before reaching poorly maintained chip sealed roads that lead to better asphalt highways. Today's vehicles struggle under these conditions without the added electrical components which are not designed for this environment.
- 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.
  - o Our ranchers have to haul animals at least two hours to either Belen or Kirtland to find a cattle market.
- There has not been a robust public engagement process on the rules that will impact New Mexicans statewide.
  - o 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,

  
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 President

Sandoval County Farm & Livestock Bureau

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