October 31, 2023

To whom it may concern:

On behalf of the New Mexico Association of Conservation Districts (NMACD), we would like to submit comments about the proposed Clean Fuel proposal for New Mexico. We understand that there is an exemption for agriculture but that is open to interpretation. If trucks carrying all Agriculture products are not exempt as well; this proposal will drive up the cost of food even more.

NMACD represents 47 New Mexico Soil and Water Conservation Districts. Our mission is to steward conservation of our public and private lands by providing opportunities and quality support to local conservation districts and partners through representation and leadership. Most of our boards and the conservationists we partner with are farmers and ranchers. Although the proposed New Mexico Clean Fuel Standard primarily targets the fuel industry, it can indirectly impact the cost of food and conservation efforts in several ways:

1. Increased production costs: If the CFS leads to a higher demand for clean fuels, it will increase the production costs for fuel companies. This can potentially result in higher fuel prices, impacting transportation costs for food producers, processors, and distributors. These increased costs may be passed on to consumers, affecting the overall cost of food.

2. Supply chain disruptions: As the CFS encourages a transition to clean fuels, there could be a temporary disruption in the supply chain for traditional fuels. This may cause logistical challenges for food producers and processors, potentially resulting in delayed deliveries or increased transportation costs. Ultimately, these disruptions could impact food prices. This is particularly true in rural areas like New Mexico.

3. Renewable energy in agriculture: The implementation of the CFS can encourage the use of renewable energy sources, such as biofuels, in the agricultural sector. This could lead to increased competition for crops used in both food production and fuel production, potentially driving up the prices of those crops. Higher input costs for farmers and ranchers will also have a ripple effect on food prices.

4. If you insist on moving down this path, it should only be implemented after increased research and development has occurred: To meet the requirements of the clean fuel standard, we need increased research and development in biofuel and alternative fuel technologies.

Sincerely, 

Debbie Hughes, NMACD Executive Director