

Rich Ford

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New Mexico Improvement Board

Via email: pamela.jones@state.nm.us

Attn: Pamela Jones, Board Administrator

New Mexico Environment Department – Harold Runnels Building

P.O. Box 5469

Santa Fe, NM 87502

Albuquerque Bernalillo County Air Quality Control Board

P.O. Box 1293

Albuquerque, NM 87103

Dear Respective Board Members,

In response to the proposed rules under consideration to implement the Advanced Clean Cars and Advanced Clean Trucks Rules, we would like to make it known, as a long time New Mexico automotive dealer, that we are not in favor of these proposed changes. While we recognize that Electric Vehicles and Plug in Hybrid Electric vehicles are viable transportation options for some, they, unfortunately, are not a good choice for most people, and here is why:

- **Cost.** Currently, even the least expensive all electric vehicle we sell is thousands of dollars more than a comparably equipped gas motor vehicle or even a hybrid. Approximately 90% of our customers finance their vehicles, and the proposed legislation would simply make these vehicles unaffordable. Most of our customers live paycheck to paycheck, and this would make matters worse, financially, for most of them. On a per mile cost, EV's are still more expensive to operate than comparably equipped gas models.
- **Availability:** While this is not nearly as much of a problem now, if the proposed legislation is passed, we fear that we would face the same kind of shortages we did in Covid simply because of the global supply chain issues that still linger with these technologically advanced vehicles.
- **Infrastructure and Charging issues:** Most of the high-capacity batteries used in all EV's require specialty chargers, which in turn require special electrical requirements to quickly and adequately charge their batteries to maximum capacity, and this also comes at the expense of the customer. Having an electrician come to a customer's residence would be a huge inconvenience, and a monumental expense that is additional to already higher price of an EV. While there are more public charging stations now, it would be hard to believe that rural stations, with high-capacity chargers, would be readily available for customers needing a quick charge to get them to their destinations.
- **Range:** New Mexico is a unique state in that, apart from the Albuquerque metro area, it is a very rural state. Many of the "published" ranges are not indicative of their actual range because of the way that the vehicle must be driven to attain the maximum range. Most customers want to run their Air Conditioning and heaters, and doing so degrades the maximum range. New Mexico, even on the eastern plains, is a very hilly state, and that also leads to more electric

consumption and lower ranges than published. Many customers simply must have a vehicle that will give them more range than many of these EV's can deliver.

- Towing and Hauling: While there are some EV's that do have some impressive max towing capabilities, they simply can't handle, for long distances, the loads, and trailers that many of our customers have. Many ranchers and farmers would be impacted economically if they were forced to own an EV that simply isn't able to haul and tow what they need to make their living.
- Choices: The proposed legislation would severely limit customers' choices and needs. Customers want to make choices that are based on economy, dependability, total ownership costs and limiting customer's choices would have a severe impact on the dealer's survivability.
- Education: Most customers, once truly informed on the true shortcomings of an EV, would find that this proposed legislation is nothing more than a "feel good" proposal, with little to no evidence that mandating 43% of the vehicles sold would really make a meaningful impact on our air quality or environment. In fact, the processes and materials that are used to manufacture the batteries for these EV's have proven to be more harmful. Also, what, if any, plans have been made for the disposal or recycling of the spent batteries once they have run their effective lives, especially if the legislation is passed.

All in all, I think that we, as a dealer body, need to offer real facts, based on real information to our law makers, and oppose such detrimental legislation. If this legislation is indeed passed, it would cripple an industry that provides a huge amount of tax revenue to our state, supports many employees and their families, and the residual jobs that are supported by the large automotive retail business.

Respectfully,

Rich Ford Sales

8601 Lomas Blvd NE

Albuquerque, NM 87112