

Ziems Ford Corners

Please see attached letter.

November 9, 2023

New Mexico Improvement Board
Albuquerque/Bernalillo County Air Quality Control Board
Attn: Pamela Jones, Administrator
PO Box 5469
Santa Fe, NM 87502

Dear Respective Board Members,

Thank you for the opportunity to submit comments on the proposed rules that are under consideration. I am writing to express my strong opposition to the Advanced Clean Car II Rules. I am the General Manager of an auto dealer in Northwest New Mexico and have been in the Automotive business for close to 30 years.

To be clear, I am in no way opposed to electric vehicles, I feel they are an excellent choice and fit the needs of transportation for some New Mexicans. However, I feel that moving to the Advanced Clean Car II Rules at this point is premature for New Mexico. We have multiple EVs on our lot for sale now with very little interest from our consumers. When we present these vehicles to our customers, we often run into the common hesitations of range anxiety, charging time, cost of vehicle and future costs of battery replacement. Our customers have also voiced their anxiety about the loss of freedom their ICE vehicles afford them, the ability to travel long distances in short times especially in the rural environments we inhabit. Some of our biggest opposition to the EVs is from our Native American customers who live on the reservation, many of them live without running water and most with only enough electricity to power the necessities of life. I feel this rule will put undue hardship on a large group of New Mexico citizens that don't have the means to afford the purchase of the vehicles and installation of at-home infrastructure required by this type of transportation. I am confident that when presented with a choice of buying an EV vs going out of state to purchase a vehicle that fits their needs, the consumer will always choose the option that fits their needs and their budget. As a result, a great deal of business and tax revenue will likely leave the state of New Mexico.

Other obstacles to consider are the manufacturers' ability to produce enough EV's to meet the mandates of other clean car states. Many auto manufacturers are scaling back their investment and production targets of the EV's due to lack of demand. In fact, one manufacturer has stopped supplying ICE vehicles to dealerships in clean car states. This has forced these residents to special order a vehicle and wait 6-8 months, leave the state to purchase a vehicle from an out-of-state dealership or be forced to purchase a used vehicle to meet their needs. This would drive up the cost of used vehicles which would also be a detriment to New Mexico citizens.

Again, I am not against the sale of electric vehicles but I am definitely against a rule that requires consumers to either purchase a vehicle they cannot use or afford in state, or travel out of state to purchase a vehicle that fits their needs. I encourage the Environmental Improvement Board to consider these concerns and work toward a more inclusive and holistic approach. While I support the transition to cleaner vehicles, it is important that this transition does not leave behind our most vulnerable members of our society.

Sincerely,

Matthew Clugston
General Manager
Ziems Ford Corners