New Mexico Cattle Growers' Association

Please see comments attached.

Thank you,

Loren Patterson



New Mexico Cattle Growers' Association

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November 13, 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: NMCGA comments on EIB 23-56 (R)

Dear EIB Board Members:

The New Mexico Cattle Growers' Assocaition (NMCGA) urges you to vote no on EIB 23-56 (R).

The mission of the New Mexico Cattle Growers' Association is to advance and protect the cattle industry of New Mexico, work toward solutions of cattle industry problems, promote the wellbeing of the industry, provide an official and united voice on issues of importance to cattle producers and feeders, and create and maintain an economic climate that will provide members of the Association the opportunity to obtain optimum return on their investments within the free enterprise system. NMCGA has members in 32 of our state's 33 counties and in 18 other states.

NMCGA opposes EIB 23-56 (R) for the following reasons:

There are many areas in New Mexico that don't register pollution problems. Many of these areas are rural. Residents in those areas must travel long distances to school, work, groceries, and hospitals. Given the limited range of EVs, these residents will have to rely in whole or in part on vehicles with internal combustion engines. Why do residents in those areas where there is no pollution problem have to abide by the proposed rules for areas that have pollution issues? Where is the environmental justice in the placement of that burden on rural New Mexicans?

There are also multiple practical issues with EVs and hybrids. Given the long distances in rural New Mexico that residents must travel and the limited range and lack of charging stations for an EV, EVs are not an option. Those rural residents will need hybrids or used vehicles with internal combustion engines. The availability of hybrids is projected; it is not a given. The dual energy function on a hybrid will raise the cost of the hybrid. That increased cost of hybrids will be imposed on rural New Mexico, including on the rural poor. The rule will increase the demand for used vehicles with internal combustion engines. That will raise their price. At the same time those residents must pay more for their vehicles, they will also have to pay more for fuel if supply decreases, which will happen if electricity usage increases.

But there is questionable availability of electricity in remote New Mexico (who operate on solar or have unreliable electricity or none at all (32 percent of people on Navajo Reservation have no electricity)) and of fuel if this initiative has slashed demand.

We urge you to vote no, wait until infrastructure and cars are proven, not projected and, when you do act, authorize exemptions for rural New Mexico.

Sincerely,

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Loren Patterson President