

November 8, 2023

New Mexico Improvement Board
Albuquerque/Bernalillo County Air Quality Control Board
Attn: Pamela Jones, Administrator
P.O. 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 a General Sales Manager at a new car dealership. I am committed to help New Mexicans purchase a car that is right for them based on their budget and transportation needs.

I want to be clear that I do not oppose electric vehicles and feel that they are part of our transportation future. As technology advances and when there is sufficient charging infrastructure to support the EV's the adoption rate or demand in EVs will certainly increase. I have several models of EVs currently available for sale and have noticed the steep decline in interest of EVs from my customers in recent months. The reasons stated is that they are unsure if an EV is right for them due to range anxiety, their safety while traveling and needing to spend close to an hour charging. Many have also have expressed concern about the price of EVs and the residual value of their vehicle as an EV battery shelf life is approximately 8 – 15 years.

Other obstacles to consider are the manufacturer's 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 their EV's due to the lack of demand. In fact, one manufacture has stopped supplying traditional vehicles to dealerships in clean car states. This has forced these residents to either 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 purchased a used vehicle to meet their needs. If consumers cannot purchase a new vehicle of their choice they may be forced to purchase a used vehicle which will cause the price of used vehicles to dramatically increase which will affect all New Mexicans negatively.

I am in the process of readying my dealership for EV charging infrastructure. What I am finding out is that many charging and equipment manufacturers are overwhelmed due to supply chain shortages on transformers and other utility equipment forcing us to wait anywhere from 18 to 40 months for our equipment to arrive in order for it to be installed. Demand for this equipment will be increasing therefore compounding this issue and these delays will set back the progress of reliable infrastructure and will further reduce consumer confidence in electric vehicles.

I encourage the Environmental Improvement Board to consider these concerns and work towards 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,

Brandon Pierce

