

New Mexico Interfaith Power and Light (Clara Sims)

Dear Environmental Improvement Board,

On behalf of New Mexico Interfaith Power and Light, an organization that mobilizes faith communities across the state to address climate change, we submit the following comments.

First, we want to express gratitude to the New Mexico Environment Department for their hard work in proposing this rule. We also want to thank you, the EIB, for carefully deliberating upon the most climate responsible and economically just way of implementing the Clean Transportation Fuel Program.

Along with many other grassroots organizations working with frontline communities who are disproportionately burdened by the impacts of fossil-fuel emissions and road pollution, our primary concern is that any rules to implement the state's Clean Transportation Fuel Program actually yield measurable and enforceable emissions reductions. We ask that your decision making be grounded in consensus driven science and that the economic benefits of this program are focused on helping disadvantaged communities, including substantial investments in public transportation.

In light of attempts to roll back federal regulations of greenhouse gas emissions, you have an incredible opportunity to pass a nation-leading program that meaningfully cuts emissions, supports jobs for New Mexicans, and promotes healthier air for our communities of life. Additionally, as the second-largest producer of oil and gas in the country, our actions to adopt strong clean transportation fuels standards are a crucial responsibility in working toward the common good of not only the people of New Mexico but people across the entire globe.

To create the most effective, climate responsible, and economically just rule possible, we urge the Board to address the following key components of the rule that could undermine its effectiveness:

Measurable and In-State Benefits: The proposed "book-and-claim" accounting loophole would allow the industry to take credit for fuels used in other states. This does nothing to help our communities or reduce pollution here at home. We must ensure that credits are only generated by actions that lead to real emissions reductions within New Mexico.

Science-Based Standards: We urge the Board to ensure the rule recognizes the full benefits of electric vehicles, which are far more efficient and run on increasingly cleaner power sources. The rule must also recognize public transit for its work in reducing emissions. Ignoring these benefits weakens the overall effectiveness of the program.

No Special Treatment for Polluters: The current proposal includes special treatment for methane from factory farms, which are a source of significant pollution. Rejecting this provision is essential to ensure the program incentivizes true emissions reductions across all sectors and does not benefit polluting industries.

Effective Enforcement: A lengthy and complex enforcement process directly hinders the ability to ensure the rule is working as intended. We urge the Board to streamline these measures so that compliance can be swiftly and effectively enforced.

We thank you again for your service and for your consideration of these crucial points. By strengthening this rule, you can ensure we build a program that truly reduces climate pollution, increases economic opportunities and justice for disadvantaged communities, and serves the flourishing of New Mexicans and this sacred web of life on which we depend.

In gratitude,

Rev. Clara Sims,

Assistant Executive Director, New Mexico Interfaith Power and Light