

Johnnie Frazzini

Subject: Public Comment on Permit Application 10883 — YGI Microgrid (Project Jupiter)

To the New Mexico Environment Department,

As a resident of Doña Ana County, I am writing to express my severe concerns regarding the environmental, economic, and public health impacts of Project Jupiter (Permit Application 10883). I strongly urge the NMED to deny this permit, or at the very least, delay any decision to allow the State of New Mexico and Doña Ana County to implement a long-term moratorium of at least 18 months to fully evaluate the project's cumulative toll on our community.

My specific technical and community concerns regarding the draft permit parts are detailed below:

- **Aggregated Microgrid Emissions:** The draft permit separates the generation units into independent segments, but NMED must evaluate the total, cumulative air quality impact of the entire YGI Microgrid infrastructure as a single major source of stationary pollution.
- **Underestimation of Nitrogen Oxides (NO_x):** The continuous operation of a natural gas-fueled microgrid to power a large-scale data center introduces significant, localized NO_x emissions that threaten Doña Ana County's regional compliance with National Ambient Air Quality Standards (NAAQS).
- **Particulate Matter ($\text{PM}_{2.5}$ and PM_{10}):** The Modeling Review Report must account for localized, low-level ground impacts of fine particulate matter under worst-case weather conditions, especially considering the high frequency of dust storms in our region.
- **Inadequate Carbon Monoxide (CO) Controls:** The draft parts do not mandate the Maximum Achievable Control Technology (MACT) for reducing carbon monoxide emissions from continuous-run fuel cells or backup generators.
- **Flawed Baseline Modeling Assumptions:** The ambient air quality modeling relies on historical meteorological data that fails to project future climate extremes and localized heat island effects generated by the massive data center complex itself.
- **Environmental Justice Concerns (Public Involvement Plan):** The location of this heavy industrial microgrid disproportionately risks the air quality of surrounding border communities, making the current Limited English Proficiency outreach insufficient for ensuring true community-wide informed consent.
- **Unfunded Public Health and Remediation Costs:** The long-term costs of environmental cleanup and decommissioning when the project is no longer viable must be legally factored into the permit up front. Furthermore, the immediate and long-term public health costs inflicted on county residents by this facility must be calculated, with corresponding tax frameworks established, so the state and county are not left bearing the financial burden of Project Jupiter's pollution.
- **Compromised Public Record:** Given the New Mexico Department of Justice's active fraud investigation into forged community support letters submitted for this exact application, NMED cannot in good faith approve this permit until the public record has been completely audited and

cleared of fraudulent inputs.

For these reasons, the administrative review must be halted until the public health, environmental safety, and regulatory integrity of this project can be fully guaranteed.

Respectfully submitted,

John Frazzini
Las Cruces, NM