

July 5, 2026

Dear Ms. Romero, Ms. Kuhn, and Permitting Program Staff:

I am commenting to deny the application of the Yucca Growth Infrastructure Micro Grid. The communities being targeted with this microgrid, along with the rest of Project Jupiter, are communities of color. This can be seen by the location of the current Project Jupiter construction site, and the proposed location for the YGI Microgrid. The community members of Santa Teresa and Sunland Park deserve the right to a hearing because these are the community members who would be most directly affected by the building of this micro grid. A hearing should be held in either Santa Teresa or Sunland Park, and should be held in both English, Spanish, with a hybrid option because the majority of community members are Spanish-speaking. Additionally, many residents who have the right to participate are elderly and disabled. The building of this site would simultaneously perpetuate environmental racism and global warming because of its location centering in a community of color while also emitting a damaging amount of pollutants.

- I. The YGI Microgrid application must be denied because the Microgrid will emit pollutants that would create deadly health risks for community members.

The YGI Microgrid would be a source of Hazardous Air Pollutants, according to Section 1-F of the application.¹ There is a lack of specificity about how these air pollutants would affect the environment, which can be seen by the insufficient Air Pollutant testing portion of the application.² According to Section 1-D of the YGI Microgrid Application, there are many

¹ See YGI Microgrid Air Pollution Permit Application at Section 1-F, Page 4, Row 4, Accessible at: https://cloud.env.nm.gov/resources/_translator.php/ZWM3Njk5ZGQ3MjNjNzZiMjRmZmU1ZjgyMF8yMjYwMDk~.pdf

² PROJECT JUPITER, BLACKSTONE, BCP, THE TIME TO SPEAK UP IS NOW, Accessible at: <https://newenergyeconomy.salsalabs.org/project-jupiter-blackstone-bcp-speak-now?wvpId=0640b58a-984b-435f-b5a3-3c2701bc2161>

communities that would be within a 10 mile radius of the microgrid. These communities include Santa Teresa (3.6 mi), El Paso (4.6 mi), Sunland Park (6.0 mi), and Vinton (9.85 mi).³ The combination of carbon dioxide emissions and Hazardous Air Pollutants will likely cause an increase of health issues for surrounding communities. Carbon Dioxide and pollutants classified as Hazardous Air Pollutants (HAP) increases the chances of many deathly health risks.⁴ Many which include:

- Lung disease⁵
- Heart attacks
- Strokes
- Cancer
- Autoimmune disease
- Neurodegenerative conditions⁶
- Asthma
- COPD

The community members of Santa Teresa and Sunland Park would have an increased risk of contracting the illnesses listed above due to the close proximity of this potential micro grid. According to an article by Healthy Climate Wisconsin called *Data Centers Harm Community Health*, living in a zip code with a fuel-fired power plant “increases the hospitalization rate for

³ See YGI Microgrid Air Pollution Permit Application at Section 1-D, Page 3, Row 7, Accessible at: https://cloud.env.nm.gov/resources/_translator.php/ZWM3Njk5ZGQ3MjNjNzZiMjRmZmU1ZjgyMF8yMjYwMDk~pdf

⁴ The United States Environmental Protection Agency, (February 10, 2026). Accessible at: <https://www.epa.gov/haps/health-and-environmental-effects-hazardous-air-pollutants>

⁵ What are possible data center health impacts and can they be reduced? (June 2026) Accessible at: <https://wausaupilotandreview.com/2026/06/23/what-are-possible-data-center-health-impacts-and-can-they-be-reduced/>

⁶ Stated by Dr. Jonathan Patz, a professor of population health sciences at the UW School of Madison and Public Health (n 5)

asthma by 11%, respiratory infections by 15% and COPD rates by 17% over communities without.”⁷ On average, a zip code contains approximately a 10 mile radius.⁸ Therefore, every community listed above would have an increased chance of COPD and respiratory issues because the farthest community listed is 9.85 miles (Vinton) which is less than 10 miles. These possible health risks require the Department to deny YGI’s Application.

II. The YGI Microgrid application should be denied because it perpetuates global warming.

The building of this microgrid would not only perpetuate environmental racism, but also the detrimental effects of climate change. Every year, human activities increase the amount of carbon dioxide released into the atmosphere—more than natural processes can remove.⁹ The years with the largest carbon dioxide output have a direct correlation with the strongest El Niños.¹⁰ An “El Niño” is defined as “the warm phase of a natural climate pattern in the tropical Pacific which leads to high temperatures over land and sea and an expansion of global drought.”¹¹ Therefore, the potential building of the micro grid would perpetuate global drought because the project will emit over 20 billion pounds of carbon dioxide. This is more than the total emissions of New Mexico’s three major cities put together—Albuquerque, Las Cruces, and Santa Fe.¹² Not even including the Hazardous Air Pollutants, the carbon dioxide output alone that the micro grid can generate would create added drought in a community that already experiences drought and water scarcity on a regular basis.

⁷ (n 5)

⁸ What is a Radius Map? Accessible at: <https://www.smappen.com/radius-map/>

⁹ “Climate change: atmospheric carbon dioxide,” (May 21 2025) Accessible at: <https://www.climate.gov/news-features/understanding-climate/climate-change-atmospheric-carbon-dioxide>

¹⁰ (n 9)

¹¹ (n 9)

¹² PROJECT JUPITER, BLACKSTONE, BCP, THE TIME TO SPEAK UP IS NOW,

Accessible at:

<https://newenergyeconomy.salsalabs.org/project-jupiter-blackstone-bcp-speak-now?wvpId=0640b58a-984b-435f-b5a3-3c2701bc2161>

In addition to the perpetuation of climate change, a high amount of carbon dioxide in a community is an increasing public health hazard.¹³ The emission of 20 billion pounds of CO₂ would have severe health impacts for the local communities, in addition to plants and animals. The heat island that would be created by Project Jupiter, and increased by the YGI Microgrid, would expose the community with extreme temperatures that can lead to severe injury and death.¹⁴ As defined by National Geographic, a heat island is an area that is created by energy that causes significantly warmer temperatures than its surrounding areas.¹⁵ These are usually found in population dense, metropolitan areas, but a data center alone mirrors the energy a dense city like New York City creates. The population of New York City is approximately 8.5 million people.¹⁶ The combined population of Santa Teresa and Sunland park is approximately 23,500 people.¹⁷ Therefore Sunland Park and Santa Teresa would emit the amount of pollution that a city 360 times its size would emit, simply from the YGI Microgrid and data center alone. A data center can increase temperatures up to 16 degrees on the property, which could make extreme heat more dangerous for up to 6.2 miles from the data center site.¹⁸ These extreme heat conditions, in an area that already has severe heat conditions due to its arid climate, exacerbates existing health conditions while also creating new ones. These reasons make it evident that the Department must deny YGI's Application.

III. The YGI Microgrid Application should be denied because the building of it would uphold racism.

¹³ (n 12)

¹⁴ "What are the possible data center health impacts and can they be reduced?" (June 2026). Accessible at: <https://wausaupilotandreview.com/2026/06/23/what-are-possible-data-center-health-impacts-and-can-they-be-reduced/>

¹⁵ National Geographic. Accessible at: <https://education.nationalgeographic.org/resource/urban-heat-island/>

¹⁶ US Census Bureau, Accessible at: <https://www.census.gov/quickfacts/fact/table/newyorkcitynewyork/PST045224>

¹⁷ Accessible at: https://www.bestplaces.net/compare-cities/sunland_park_nm/santa_teresa_nm/overview

¹⁸ (n 14)

The location of this proposed microgrid exposes how Project Jupiter is targeting communities of color. This form of racism is known as environmental racism. Environmental racism is defined as the intentional siting of polluting and waste facilities in communities primarily populated by African Americans, Latines, Indigenous People, Asian Americans and Pacific Islanders, migrant farmworkers, and low-income workers.¹⁹ These communities are disproportionately exposed to fumes, toxic dust, ash, soot, hazardous waste, and other pollutants.

A historical example which has been upheld in America for nearly the past century is redlining. Redlining is a discriminatory practice where low-income and minority communities are intentionally cut off from lending and investment.²⁰ These neighborhoods suffer from reduced wealth, greater poverty, lower life expectancy, and higher incidence of chronic diseases. The word “redlining” refers to the actual color-coded red patches that were used to indicate which neighborhoods were considered “Type D,” the most high-risk areas for home loans. The areas in red—usually urban areas with majority Black populations—were the biggest risks. This caused homebuyers within these areas to constantly be denied home loans, charged higher interest rates, and denied services.²¹ The constant exposition to high pollutants in redlined areas causes a health disparity for communities of color. These populations of color have an increased rate of child blood lead levels and firearm violence.²² Additionally, these communities lack access to a quality public education due to the lack of educational funding. The passing of the YGI Microgrid application would perpetuate the effects of redlining. Like redlining, the YGI Microgrid would create deadly health risks and suppress economic opportunities for

¹⁹ Coined by civil rights leader Dr. Benjamin F. Chavis Jr, Accessible at:

<https://www.nrdc.org/stories/what-environmental-racism>

²⁰ National Community Reinvestment Coalition, Accessible at:

https://www.ncrc.org/redlining/?utm_term=meaning%20of%20redlining&utm_campaign

²¹ Merlin Law Group, Accessible at: <https://www.merlinlawgroup.com/what-is-redlining/>

²² A study by the the University of Wisconsin-Milwaukee, Accessible at: <https://www.cuph.org/health-equity.html>

communities of color. This makes it evident that, if constructed, the microgrid will perpetuate structural racism which has historically existed in this country since the birth of America.

The YGI Microgrid would be a site of pollution that primarily targets Hispanic people and low-income workers. The population for Sunland Park is 93.6% Hispanic²³ while the population for Santa Teresa is 83.7% Hispanic.²⁴ These communities are being targeted because they are majorly Hispanic. This is evident by the fact that the construction site for Project Jupiter is directly across the street from Santa Teresa Highschool—a school where 95.9% of the student body is Hispanic.²⁵ The building of the YGI Microgrid would force developing teenagers to breathe in these toxic pollutants on a daily basis for simply attending school.

Lastly, there should be a public hearing held in Spanish and English. To uphold a just hearing, there must be options in both English and Spanish because 83% of Sunland Park residents are Spanish speaking and 60% of Santa Teresa residents are Spanish speaking.²⁶ The residents in these areas have a right to a public hearing because they are the people that would be most affected by the YGI Microgrid. The perpetuation of climate change and environmental racism makes it clear that the Department must deny YGI's Application.

Respectfully,

Kala Komanduri

²³ Data USA, Accessible at: <https://datausa.io/profile/geo/sunland-park-nm>

²⁴ Data USA, Accessible at: <https://datausa.io/profile/geo/santa-teresa-nm>

²⁵ US News, Student Demographics Table, Accessible at: <https://www.usnews.com/education/best-high-schools/new-mexico/districts/gadsen-district-independent-schools/santa-teresa-high-school-12933>

²⁶ Language Data Table, Accessible at: <https://data.nextburb.com/us/compare-places/santa-teresa-nm-vs-sunland-park-nm/demographics/>