

June 28, 2026

Re: Air Quality Construction Permit Yucca Growth Infrastructure, LLC

Good afternoon, Permit Review Team:

Thank you for the opportunity to comment on the Construction Permit for Yucca Growth Infrastructure LLC in Doña Ana County.

This proposal is of significant public concern, given the existing air quality issues in our region, and the likely increase to adverse health outcomes if a permit is issued. Below I will outline a number of these issues in detail, and have included references at the end of this letter.

The proposed microgrids are planned to release more than 10,100,000 pounds of greenhouse gases every year.

Our region currently experiences poor air quality due to our unique meteorological and geographic profile. Doña Ana County is often the only New Mexico county that appears on the EPA’s “Current Nonattainment Counties for All Criteria Pollutants,” including for May 2026 (Ozone and PM-10.) With substantial morbidity from a variety of respiratory and cardiovascular diseases (see chart) the cost of added pollutants from this plant would mean more missed work and school days, and higher risk of mortality from a number of diseases (American Lung Association, 2024).

Given the vulnerability of residents, and the existing air quality issues that Las Cruces experiences, I request that no permit be issued to Yucca Growth Infrastructure that would lead to increased hazardous air pollutants (EPA, 2016).

Respectfully,


Becky Corran, MPH

**Doña Ana County
Air Quality Risk Profile**

Total Population:	221,508
Children Under 18:	52,853
Adults 65 & Over:	36,602
Pediatric Asthma:	3,322
Adult Asthma:	17,850
COPD:	8,697
Lung Cancer:	69
Cardiovascular Disease:	11,371
Pregnancy:	2,419
Poverty Estimate:	41,993
People of Color:	163,692

*Source: American Lung Association,
2023 State of the Air*

References:

American Lung Association. (2024 Jan. 1). *State of the Air, New Mexico: Doña Ana*.
<https://www.lung.org/research/sota/city-rankings/states/new-mexico/dona-ana>

Environmental Protection Agency. (2024 Jan. 31). *Current Nonattainment Counties for All Criteria Pollutants*.
<https://www3.epa.gov/airquality/greenbook/ancl.html>

Environmental Protection Agency. (2016 Dec. 22). *Technology Transfer Network
U.S.-Mexico Border Information Center on Air Pollution (CICA)*. https://www3.epa.gov/ttnatc1/cica/airq_e.html

Orellano, P., Reynoso, J., Quaranta, N., Bardach, A., & Ciapponi, A. (2020). Short-term exposure to particulate matter (PM₁₀ and PM_{2.5}), nitrogen dioxide (NO₂), and ozone (O₃) and all-cause and cause-specific mortality: Systematic review and meta-analysis. *Environment International*, 142, 105876-. <https://doi.org/10.1016/j.envint.2020.105876>