

Ron Fitzherbert

I respectfully urge the New Mexico Environment Department to deny, or at a minimum delay, issuance of this permit until the applicant has fully demonstrated that the project will not adversely impact air quality or public health.

Although the applicant describes the proposed microgrid as an improvement over previously proposed technologies, the fact remains that this is a new fossil fuel-powered energy facility intended to support an extremely large data center. The Department should require complete, transparent, and independently verifiable analyses of the project's emissions, cumulative air quality impacts, greenhouse gas emissions, hazardous waste generation, and any reasonably foreseeable future expansion before approving the permit. The applicant's revised proposal supersedes earlier applications, making careful scrutiny even more important. (ResourceSpace)

In addition, this project raises broader concerns regarding cumulative impacts on surrounding communities. Air permitting should not evaluate emissions in isolation if the microgrid is an integral part of a much larger development. The Department should consider whether the permit appropriately accounts for the overall environmental footprint associated with supporting the adjacent data center and whether additional review is warranted. Community members have already raised concerns regarding cumulative impacts, environmental justice, and the completeness of the application. (New Mexico Environmental Law Center)

New Mexico has an obligation to protect the health of its residents and the quality of its air. Where significant uncertainty exists regarding long-term emissions, public health impacts, or cumulative environmental effects, the prudent course is to require additional information rather than issue a permit that may later prove inadequate.

For these reasons, I respectfully request that NMED deny this permit unless and until the applicant has clearly demonstrated that the proposed facility complies with all applicable air quality standards, adequately addresses cumulative impacts, and serves the public interest.