

Christine Dobbin

Before you can even begin to consider this air quality permit, I urge this body to thoroughly educate themselves and reflect on the blatantly compromised processes that have brought us here. In fact, legal and ethical failures are the only consistent outcomes delivered by this project and its associates thus far. I hope you can even slightly imagine what this same behavior would mean when accompanying the privatized development of an experimental fuel cell plant of unprecedented scale. We know these deceptive practices are common among massive, out-of-state corporations and institutionalized within Doña Ana County and the state government. The decisions you make surrounding this air quality permit will clearly demonstrate whether this body functions as an independent regulatory authority or a charade entrenched in the very political favor that brought this community health disaster to your desks.

Do you know why the department and bureau's mission statements contain the words 'healthy' and 'public health'? Surely you are aware that, fundamentally, environmental contamination undermines human health at best and eviscerates livability at worst— at least that which is humane and dignified. Calculated complacency has left southern Doña Ana County with decades of poor air quality. Consistently ranking in the top 20 most ozone-polluted areas of the country has brought us higher rates of neonatal complications, childhood asthma, and premature death. To even contemplate forcing more pollution into our lungs when you have been so silent about ongoing suffering— so much of which is quite literally in your control— is unbelievable. My HOME— my FAMILY— sits less than 7 miles away from this proposed operation. We have already had high ozone days which trap people indoors with the advice of 'keep the evaporative cooler off' in the midst of blistering heat. You are deciding whether people in my community will live or die because of frivolous hazards that are 100% PREVENTABLE.

Given the applicants' insufficient testing and the technology's complete lack of reliable evidence exhibiting lifetime safety risks or efficiency at a scale that is even remotely close to what is proposed here, the applicants' pollution estimates are certainly the floor of what they will emit. It is an insult to our intelligence and homegrown education to expect us to believe that this theoretical monstrosity and its corporate handlers will respect the boundaries of these rough approximations. Let's remind ourselves of how anemic NM oil & gas regulation is in practice, particularly in terms of illegal venting and undisclosed spills. You are fully aware of ongoing and egregious oversight failures driven by strategic funding choices. With the knowledge that this is a deeply ingrained, statewide status quo at the earliest stages of reform, allowing this permit to move any further would make you complicit in generations of unescapable harm.

You know full well that the denial of this air permit is one of the only leverage points our community has to protect ourselves from expedited exploitation. If you do not stop it here, at the gateway of the very air we breathe and cannot run away from, let alone live without, you are signaling to every predatory corporation in the nation and the world that our agencies are hollow and our health is for sale. The impact of your decision will long outlast you— it can loom over and darken even your greatest accomplishments or cement your integrity in time. If the local, community-based opposition is not enough to indicate the weight of this decision, the choices made by relevant corporations to commit identity theft and fraud via this very comment portal and violate the Open Meetings Act, Inspection of Public Records Act, Lobbyist Regulation Act, and statutory IRB and LEDA application and grantee mandates, should.

If, for a moment, we ignore the fraudulent comments, I already see more than double that of the first permit. That is growing support for our community and growing fear on the part of the project's handlers. The panic of the latter is palpable. If this AIR QUALITY proposal is so beneficial for our community, why resort to illegal activity? Throwing money at communities in Las Cruces that are almost an hour away from the frontline neighborhoods of Sunland Park and Santa Teresa should never be considered an acceptable defense for worsening a chronic nonattainment zone with unproven experiments. This shiny fuel cell façade for methane gas-powered air pollution is a classic marketing ploy. To act like this is better than the prior applications is the industrial equivalent of Big Tobacco's push for vaping as a 'healthier' alternative to smoking cigarettes because it doesn't 'combust' or have an 'open flame'. Would you introduce vaping to children with the idea that it's 'healthier' than alternatives? I hope you don't expect us to allow our children to breathe in a bit of benzene and carbon monoxide here, some nitrogen oxides and smog there, and accept that it's all better than it could've been.

There is absolutely no room for more air pollution or dangerous gas pipelines in our community. Approving this permit would be nothing short of government-sponsored environmental racism. The public should be given an additional 60 days to review and comment on the air quality permit so community members can participate equitably. A public hearing needs to be held in Santa Teresa, in both English and Spanish, with an option to participate virtually. The air quality permit application must be denied given the irreversible health impacts of the applicants' estimated pollution, the technology's complete lack of scientific credibility, and Bloom Energy's history of illegally dumping hazardous waste into municipal waste streams. We already have an epidemic of illegal dumping in the area which has gone underregulated for decades. Inviting a proven bad actor that historically endangers the lives of people it profits from into our community is institutional malfeasance.

You have much more experiential information than our community did when IRBs were initially forced through despite our questions and concerns. Excuses like mistakes and incompetence no longer apply. If this permit to ravage our air moves forward, please have the decency to remove any mentions of health from your mission statements because you cannot possibly represent that word while doing so.

Christine C. Dobbin, MPH