

## Eme Fitzgerald

Yucca Growth Infrastructure's gas-powered fuel cell plant is 1,000 times larger than Bloom Energy's biggest existing fuel cell plant. In fact, worldwide, Bloom Energy has developed 1.4 GW of fuel cell technology across more than a thousand locations, yet Yucca Growth Infrastructure is asking for nearly double that (2.46 GW of fuel cells) at a singular location. The largest fuel cell plant in the entire world is more than 30 times smaller than the fuel cell plant under consideration in Santa Teresa. There is absolutely no way to know, with certainty, what the actual pollution levels will be given the tremendous size differential, and thus gap in data, between operational fuel cell plants and this theoretical plant proposed by Yucca Growth Infrastructure. Betting the livability of our county on this unpredictable and unproven plan would be a total capitulation and betrayal of your so-called values: "protects the public health of New Mexicans...by preventing the deterioration of air quality;" "protect and restore the environment...foster a healthy NM for present and future generations" Though approximations of annual air pollution were provided, the testing used an extremely weak methodology leaving us, ultimately, with pseudoscientific guesses that have large margins of error. Estimated pollution levels for this gas-powered fuel cell plant are based on only three 4-hour pollution tests from a very small unit (only 65 kW). This is a far cry from thousands of sweltering fuel cells operating 24/7 at maximum output in close proximity, all in the scorching heat of our open desert. The lack of rigorous testing at even this small of a scale is lazy and very concerning, especially given that the gas power plant Yucca Growth Infrastructure wants to build is 37,000 times bigger than this unit. A 15% "safety margin" was added to the numbers provided by the applicant. Safety margins are not usually added if a company is confident in the accuracy of their pollution estimates. The public should be given an additional 60 days to review and comment on the air quality permit so community members can participate equitably.

The air quality permit application should be denied outright given Bloom Energy's history of illegal dumping hazardous waste. Approving this permit would be government-sponsored environmental racism directed at residents of Doña Ana County.

If the permit is not denied outright, a public hearing needs to be held in Santa Teresa, in both English and Spanish, with an option to participate virtually.