

To: Santa Fe County Board of County Commissioners

From: Camilla Brom

Date: Jun 10, 2025

Subject: Request for Interested Party with Standing at the Board of County Commissioners Hearing regarding the Appeal of the Planning Commission Order for Case #24-5200 (AES Rancho Viejo Solar Project)

Dear Board of County Commissioners,

I respectfully request to be granted status as an interested party with standing for the Board of County Commissioners hearing regarding the appeal of the Planning Commission decision on the Rancho Viejo Solar Project Conditional Use Permit application.

I was not a party with standing at the Planning Commission Hearing, as an unforeseen and unavoidable family emergency occurred during the window of time the county provided for letters of request to be submitted, which was approximately 3 days. I did submit a request for standing for the SLDC Hearing Officer hearing, however only two parties were selected out of six applicants; the two being the San Marcos Association and the Clean Energy Coalition.

Over the past several years, I have been actively involved in public outreach regarding responsible renewable energy development, with the mission of supporting our state in transitioning to clean energy, while avoiding unnecessary risks to our communities and further destruction to our environment. During this time, a specific focus has been on opposing the Rancho Viejo Solar Project due to the potential risks and impacts associated with its development.

As part of my outreach efforts, I founded and continue to lead a grassroots campaign, New Mexicans for Responsible Renewables (NM Responsible) through which I have expanded public awareness using a range of platforms, including a website, Facebook group, Change.org petition, mass email communications, public presentations, and media interviews. This public outreach has also led to connections with numerous communities, both nationally and internationally, who are confronting similar land use concerns.

I have been involved in the proposed Rancho Viejo Solar project since early spring of 2022, and although I oversee a grassroots campaign which opposes the Rancho Viejo Solar Project, this campaign is not affiliated with any organizations of record (Rural Organizations) who are parties with standing for the upcoming Board of County Commissioners hearing.

Today, I respectfully request standing both in my individual capacity as an aggrieved adjacent property owner who will be directly and materially impacted by the proposed project, and in my capacity as the founder and sole administrator of a local grassroots

campaign that has worked to inform and engage the public on this issue through sustained outreach efforts.

With respect to qualifications for legal standing in my individual capacity, the following factors apply:

Proximity to the Project:

My property lies adjacent to land which will be developed for this facility and located only half a mile from the SW corner of this facility; therefore, my property lies well within a zone of impact regarding safety, environmental and economic hazards.

Water Well Vulnerability:

I rely on groundwater from a well situated approximately half a mile southwest of the proposed facility. Given that the groundwater in this area flows generally W/SW, my well lies directly downgradient from the project site—placing it squarely in the path of any potential groundwater contamination originating from the facility. Given the facility’s scale and use of lithium-ion batteries, I have specific concerns about potential impacts to groundwater quality — including from runoff, spills, stormwater contamination, or long-term degradation. This constitutes a pecuniary and health-related interest.

Environmental and Public Health Concerns:

The facility’s scale and nature — including utility-scale lithium-ion battery storage and solar infrastructure — pose unique environmental and public safety risks, such as, but not limited to, fire, toxic gas release, and runoff into nearby arroyos. These risks directly impact my health, safety, property value, and water access.

Legal Basis for Standing:

From my understanding of New Mexico land use law, standing is generally granted to individuals who can demonstrate they are “directly and substantially affected” by a land use development decision. My groundwater reliance, direct environmental and safety concerns, and close proximity to facility infrastructure, should clearly satisfy this threshold.

Lastly, my role as the leader of a grassroots campaign reflects my sustained engagement, commitment to public awareness, and connection to broader community concerns regarding this project. I respectfully request that this be taken into consideration as well, when evaluating my request for standing.

If granted status as an interested party with standing, I will be providing information and evidence that has not been raised by other parties in the hearings. My intent is to not repeat information that has been or will be discussed by others, but rather to present additional information that is critical in this hearing.

As a result of extensive research regarding the Rancho Viejo Solar project and its associated risks, I plan to present in-depth information on issues such as groundwater, wildlife, and public safety—insights that are both pertinent to the Commission’s decision-making and distinct from those presented by other parties. I believe the information I will provide is vital to this hearing, therefore I do request the opportunity to present it formally.

I appreciate your consideration of my request for status as an interested party with standing.

Sincerely,

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