

WQCC 24-46 (R) – 2024 ONRW Special Designations Nomination

Public Comments

The Water Quality Control Commission (WQCC) held a public comment period on this rulemaking from October 8, 2024 through December 10, 2024. The following public comments and letters of support were provided at the hearing or submitted electronically to the WQCC via email or the New Mexico Environment Department's Public Comment Portal. All of the written comments were supportive of the designations and did not offer amendments, revisions, or new language to the proposed rule, new water bodies were not nominated for ONRW designation, and removal of nominated waters was not suggested. On behalf of the WQCC, NMED acknowledges and thanks the hearing participants for their time and interest in this matter. The written comments below are lightly edited for clarity, grammar, spelling, and format.

Oral Public Comments

The WQCC received and considered oral public comments at the hearing. The majority of the comments were supportive of the petition and nominated water bodies for ONRW designations. However, the Village of Pecos and the New Mexico Department of Game and Fish (NMDGF) raised concerns with two of the nominated waters and the proximity to their existing facilities with National Pollutant Discharge Elimination System (NPDES) Permits. At the direction of the WQCC, NMED discussed the Village's and NMDGF's concerns and addressed their issues before the end of the hearing.

The full text of oral public comments and the WQCC's and NMED's responses may be found in the Transcript of the hearing and deliberations (pg 108 – 161) available on NMED's website at www.env.nm.gov/surface-water-quality/2024onrw. Additionally, a recording of the hearing is available on NMED's YouTube channel at <https://youtu.be/Y-LJ0suhZmA?si=jCqDUQdyMwyRBF2>. The public comment portion begins at 2:21:51.

Written Public Comments

Catherine A Louise

I have lived in the Pecos River Valley for 37 years. My family has walked the valley and swum in the river for all that time. We have also seen the effects from the different fires that pollute the river, the mine in the Upper Pecos that killed the fish for many years and harmed other animals and people from contaminated water.

It is imperative to keep this river clean and healthy. The designation for ONRW is a necessity for the health and well being of this area, clean water and the planet. It's the sensible thing to do. It is time for human beings to honor our future as well as our present. We must take care of what we have for ourselves and our children.

Stop the devastation and destructive madness now! Protect the Pecos Wilderness and River!

Amy Brenneman

I am writing to convey the significance for the Water Quality Control Commission to grant designation to the nominated Outstanding National Resource Waters of New Mexico. As a native New Mexican, I determined to help protect the place I love not only for my generation, but for future generations to

come. With this designation, these waters will receive enhanced protection under the State of New Mexico's Standards for Interstate and Intrastate Surface Waters and the federal Clean Water Act.

To do my part to ensure New Mexico continues to care for the land I call home, I serve as a member and volunteer for several conservation groups, including New Mexico Trout, New Mexico Wildlife Federation, and the national organization, Trout Unlimited. I also serve as board member for my local chapter of Trout Unlimited, the Bosque Chapter. The Bosque Chapter has over 600 members and makes up one of the four chapters within New Mexico, which has a total of about 1200 members. I have participated in several volunteer activities including but not limited to: volunteering during Public Lands Day on the Valles Caldera National Preserve, fish monitoring in the Valles Caldera, and willow planting in the Rio Cebolla to improve habitat for beavers and trout. I also attend regular monthly speaker programs to educate myself with conservation efforts around the state.

I would like to emphasize the importance of what this designation means for the state of New Mexico. We must do our part to protect these waters to ensure clean water and protection of valuable habitat and wildlife. This is why I urge the Water Quality Control Commission to grant Outstanding National Resource Waters to those that are designated.

Thank you for your support in this extremely important matter.

Ralph Vigil

As a farmer and 7th generation acequero in East Pecos, NM, I support WQCC 24-46 (R) Outstanding National Resource Waters, 20.6.4.9.D NMAC for the following reasons:

1. **Protecting Our Water Heritage**
New Mexico's rivers are the lifeblood of our communities, providing clean drinking water, sustaining agriculture, and supporting fish and wildlife. Designating these river miles as Outstanding Waters ensures future generations will benefit from the clean, healthy ecosystems that are vital to our way of life.
2. **Climate Resilience through Clean Water**
As climate change continues to challenge New Mexico's water resources, protecting these rivers is a critical step in safeguarding the water security of our state. Outstanding Waters designation helps mitigate the impacts of drought and extreme weather by preserving the natural functions of these waterways.
3. **Economic and Recreational Benefits**
Outdoor recreation is a cornerstone of New Mexico's economy. By safeguarding these river miles, we not only protect clean water but also enhance opportunities for fishing, boating, and tourism, which contribute significantly to local economies and livelihoods.
4. **Cultural and Agricultural Importance**
For centuries, farmers, ranchers, and acequia communities have depended on these rivers for irrigation and sustenance. Protecting these waters as ONRWs recognizes their cultural significance and secures their availability for traditional agricultural practices that are the backbone of our rural communities.
5. **A Shared Responsibility**
This designation reflects a commitment by all New Mexicans to protect the rivers that unite us. It's not just an environmental issue but a moral responsibility to ensure that clean, flowing waters remain a part of our collective future.

6. Biodiversity and Wildlife Habitat

The proposed rivers support diverse ecosystems that are critical for wildlife, including threatened and endangered species. Protecting these waters ensures that their habitats remain intact and thriving, reinforcing New Mexico's commitment to preserving biodiversity.

7. Aligning with Community Voices

Local governments, water conservation groups, farmers, and community members have all voiced strong support for protecting these river miles. The WQCC has the opportunity to honor this collective effort and make a bold statement in favor of water stewardship.

Pecos River Open Spaces, Susan Livermore

I am writing with support for designating the Pecos River, south of the village of Pecos to Villanueva as an Outstanding National Resource Waters. This stretch of river enriches the lives of numerous families who live here and of those who visit. Swimming, kayaking, tubing, picnicking, hiking, swimming and fishing are the activities of so many families here in El Valle. We all want to preserve this river and surrounding areas and to prevent contamination. The prospect of mining starting up again in the mountains is a true threat to the Pecos River. ONRA designation would help in this battle.

I am a board member of Pecos River Open Spaces, a non-profit formed 20 years ago, whose goal is to acquire river land and to put it under easement with the Santa Fe Conservation Trust to preserve it in perpetuity. Our family is also 1/5th owner of Swimming Hole LLC. which is under conservation easement with the Santa Fe Conservation Trust. Yes, it is quite a large swimming spot which so many enjoy in this dry high desert area.

My husband, an artist-blacksmith sculptor, and I have a studio near this canyon, which inspires us creatively and provides a renewal of spirit after work weeks. Walking down this canyon to the river restores us....forest bathing and river bathing!

I ask that our river receive this designation and help us to continue our efforts to keep the Pecos River clean and available for recreation.

NM Wild, Garrett VeneKlasen

The New Mexico Environment Department (NMED) nominated 245 river miles across the state that mitigate the impacts of climate change, safeguard clean drinking water, preserve fish and wildlife habitat, and strengthen New Mexico's outdoor recreation economy.

Community members, local governments, farmers, ranchers, and water conservation groups are urging the New Mexico Water Quality Control Commission's (WQCC) to protect these 245 river miles in the Rio Grande, Rio Chama, Cimmaron, Pecos, and Jemez watersheds as Outstanding Waters (Outstanding National Resource Waters or ONRWs) under the state Water Quality Act. Communities surrounding these watersheds depend on healthy streams to provide clean drinking water, and support agriculture, recreation, and the local economy.

These waters all have special attributes: they are located in state and national parks, are designated as Wild and Scenic Rivers, or are state Special Trout Waters. These are exceptional waters that deserve the highest level of clean water protection the state can give. An ONRW designation for these rivers will protect traditional community water uses, and safeguard waterways from degradation from mining, development and transportation, waste disposal, recreational overuse, and the impacts of climate

change, which is why there is such broad and wide ranging support across the state for Outstanding Waters protection.

Designating these 245 river miles as Outstanding Waters will help preserve traditional water uses like farming and ranching and our 400-year old acequia communities. By protecting clean water, we help preserve New Mexicans' way of life and our rich cultural heritage.

New Mexico's waters protect critical habitat for New Mexico's wildlife and support biodiversity. The waterways nominated – in our state and national parks, refugees, and national monuments – are home to many of our most beloved and valued species.

New Mexico's rivers and waterways draw locals and visitors from all over the state and the world to hike, bike, camp, hunt, fish, horseback ride, and enjoy the outdoors. This recreational activity in turn helps fuel the state's booming outdoor recreation economy and sustain local businesses, including restaurants, hotels, and retail shops. Clean rivers and streams are vital to New Mexico's agricultural economy, which depends on clean water to grow healthy crops.

New Mexico is experiencing one of the worst droughts in recent history. Safeguarding the lifeblood of our communities -- our rivers -- is critical to sustaining our communities and wildlife habitat, and mitigating against the worst impacts of climate change.

Protecting these 245 river miles as Outstanding is not just good for farming, and our health and wellbeing, but it is also good for our bottom line as a state. According to the U.S. Department of Commerce's Bureau of Economic Analysis, outdoor recreation contributes \$2.4 billion to New Mexico's economy, every year.

Enchanted Circle Trout Unlimited Chapter, Marc Space

The Enchanted Circle Chapter of Trout Unlimited (ECTU) is a volunteer non-profit organization based in Norther New Mexico. We are a diverse group of sportspeople and conservationists bound together by our shared appreciation of cold-water streams and lakes and the trout that inhabit them. ECTU became a chartered member of Trout Unlimited in 2007. Our mission is to protect, restore, reconnect, and sustain native and wild trout watersheds. We have 150 dedicated members, who carry out projects such as river cleanups, habitat improvement, environmental education, and community engagement.

ECTU fully supports all the Outstanding National Resource Waters nominations and urges the WQCC to grant ONRW designation to these important waters. Many of the streams nominated are within the Enchanted Circle and beloved by our members, including the Cabresto, Columbine Creek, Bear Creek, Red River, every stream in the Columbine-Hondo Wilderness, Frijoles Creek, Palociento Creek, and the Cimarron River. Protecting these streams from degradation will help ensure that current and future generations will enjoy clean waters filled with healthy, native species of trout.

ONRW designation will have benefits beyond trout health, including safe, clean drinking water and benefits for the local economy in small towns across the Enchanted Circle. ECTU fully supports the nominations and we applaud the WQCC for making this positive step forward for all New Mexicans.

American Rivers, Rachel Ellis

American Rivers wholeheartedly supports Outstanding National Resource Waters (ONRW) designation for the 46 stream reaches totaling 256.5 miles that have been nominated by the New Mexico Environment Department (NMED). NMED's nominated streams are already recognized as some of New Mexico's most exceptional in that their "water is a significant attribute of a state special trout water, national or state park, national or state monument, national or state wildlife refuge or designated wilderness area, or is part of a designated wild river under the federal Wild and Scenic Rivers Act." However, these waters do not have the highest water quality protection available—which is ONRW designation. ONRW designations are particularly important in New Mexico considering the recent removal of federal water quality protections from the vast majority of the states' rivers, streams, and wetlands through the Sackett vs. EPA Supreme Court decision. Importantly, ONRW designations provide protection while also allowing for continued existing uses, acequia operations, and watershed restoration.

American Rivers is particularly invested in the protection of our nation's Wild and Scenic Rivers. With the nominations of portions of the Rio Chama Wild and Scenic River and the entire segment of the Red River Wild and Scenic River, we agree with NMED that ONRW designation complements and strengthens the water quality protections already afforded to these designated Wild and Scenic Rivers.

Overall, the scope of NMED's nominations demonstrates a more watershed-scale approach to water quality protection, particularly through highlighting the importance of headwater streams and creating continuity with previously designated ONRWs. We appreciate this approach to clean water protection as it moves us towards more comprehensive safeguarding of New Mexico's ecosystems, wildlife, agriculture, and growing outdoor recreation economy.

We encourage the WQCC to approve the entirety of NMED's petition.

Truchas Chapter, Trout Unlimited, Bruce Scott

The Truchas Chapter of Trout Unlimited is a volunteer non-profit organization based in Santa Fe, New Mexico, with a local membership of over 500 members. Our organization is dedicated to conserving, protecting and restoring New Mexico's cold-water fisheries and their watersheds. The Truchas Chapter seeks to secure the remaining populations of native Rio Grande Cutthroat Trout and to restore that species into more of its historical waters. We also seek to improve the condition of the watersheds in northern New Mexico through habitat improvement projects, youth education and engagement, river cleanups, and advocacy.

By action of our Board of Directors on December 4, 2024 the Truchas Chapter strongly supports all the Outstanding National Resource Waters nominations, and we urge the WQCC to grant ONRW designation to these important waters. These streams are incredibly important to our members and we are thrilled to see them getting the protection and recognition they deserve. We also recognize that there are many reasons beyond trout fishing to grant the designation, such as securing safe drinking water and preserving traditional uses like acequias and farming. When we go out and fish these streams, we continue a storied cultural tradition in New Mexico. Conserving these waters will go a long way to ensure future generations will be able to do the same.

We thank the Commission for its consideration and the NM Environment Department for making the nominations.

The following organizations provided the attached letters of support.

Conservation Voters New Mexico, Douglas Meiklejohn

NM Trout, Ronald Loehman

Bosque Chapter Trout Unlimited, Harris Klein

Amigos Bravos, Steven Fry

The Pew Charitable Trusts, Patrick Lane

Western Resource Advocates, Brittany Fallon

Our New Mexico Waters Coalition , Steven Fry



Memorandum

To: New Mexico Water Quality Control
Commission members

Re: Outstanding National Resource Waters
nomination

From: Douglas Meiklejohn
Water Quality & Land Restoration Advocate
Conservation Voters New Mexico

Date: December 5, 2024

I write for Conservation Voters New Mexico (“CVNM”) to support the New Mexico Environment Department’s (“NMED’s”) nomination of about 245 river miles in New Mexico to be designated Outstanding National Resource Waters (“ONRW”) and to urge the New Mexico Water Quality Control Commission (“WQCC”) to designate the named waters as ONRWs to increase protection of those waters.

Introduction

By way of introduction, CVNM is a statewide non-profit non-partisan organization that values responsible stewardship of New Mexico’s water, land, and other natural resources. CVNM believes that ecological health and social equity among New Mexico’s diverse and culturally rich communities protect our state’s quality of life. CVNM is dedicated to ensuring democratic accountability and access for all New Mexicans in decision making at all levels of government. CVNM supports policies that promote long-term ecological and economic sustainability. These are the bases for CVNM’s support for the NMED’s nominations, as outlined below.

Argument

I. There is broad support for the NMED's nominations, which will help preserve traditional New Mexico uses.

As the WQCC members are aware, community members, local governments, farmers, ranchers, and water conservation groups are urging the WQCC to approve the NMED's nomination and to protect approximately 245 river miles in the Rio Grande, Rio Chama, Cimmaron, Pecos, and Jemez watersheds as ONRWs pursuant to the New Mexico Water Quality Act. The communities surrounding these watersheds depend on healthy streams to provide clean drinking water and support agriculture, recreation, and the local economies.

Designating these 245 river miles as ONRWs will also help preserve traditional water uses like farming and ranching and New Mexico's centuries old acequia communities. By protecting clean water, the WQCC will help sustain outdoor activities New Mexicans have enjoyed for generations, such as fishing, hunting, hiking, and camping.

Moreover, none of these nominated river segments are on private land and they do not impact already-existing water rights and uses, including existing irrigation, grazing, and mining.

II. Designation of the waters at issue will support local New Mexico economies.

New Mexico's rivers and waterways draw locals and visitors from all over the state and the world to hike, bike, camp, hunt, fish, ride horseback, and enjoy the outdoors. This recreational activity in turn helps fuel the state's booming outdoor recreation economy and sustain local businesses, including restaurants, hotels, and retail shops. Moreover, this recreational activity depends upon clean rivers and healthy watersheds which will be preserved by the NMED's proposed designation of ONRWs for the waters at issue.

III. Designation of the proposed ONRW's will protect the environment and combat the effects of climate change.

New Mexico is experiencing one of the worst droughts in recent history. Safeguarding the lifeblood of our communities -- our rivers -- is critical to

sustaining our communities and wildlife habitat and mitigating against the worst impacts of climate change. As the climate warms, so do rivers and streams. High stream temperature is especially dangerous to aquatic life because it can lead to less oxygen, less water, and reduced water quality. Healthy watersheds help mitigate against the impacts of climate change by acting as a buffer for the impacts of fire, floods, drought, and extreme weather events brought on by a changing climate. ONRW designation is an important tool to protect water quality against these impacts of climate change.

IV. The nominated waters all have special attributes.

Finally, the waters nominated by NMED all have special attributes. Many of them are located in state and national parks or are designated as Wild and Scenic Rivers. Many also are managed as Special Trout Waters by the New Mexico Game and Fish Department. These waters represent some of the best trout fishing streams in the state, while also providing important refuge for native fish species and other wildlife.

All of these exceptional waters should have the highest level of clean water protection the state can give – ONRW status. There is broad support for ONRW designation of these waters because that designation will protect traditional community water uses, and safeguard waterways from degradation from mining, development and transportation, waste disposal, recreational overuse, and the impacts of climate change.

Conclusion

For these reasons, CVNM urges that the WQCC approve the NMED's nomination of the named approximately 245 river miles for ONRW status.

Thank you for your attention to this important issue.

/s/ Douglas Meiklejohn

Douglas Meiklejohn

Water Quality & Land Restoration Advocate
Conservation Voters New Mexico



December 5, 2024

New Mexico Water Quality Control Commission
1190 Saint Francis Drive
Suite South 2102
Santa Fe, New Mexico. 87505

Re: Docket # 24-46 (R) – “The New Mexico Environment Department’s petition to designate 245 miles of stream that meet New Mexico’s criteria at 20.6.4.9.B(1) NMAC (“Criteria One Waters”) as Outstanding National Resource Waters (“ONRWs”)”.

Dear Commission Members:

New Mexico Trout strongly supports the New Mexico Environment Department’s petition to designate parts of 45 streams in the Rio Grande, Cimarron, Chama, and Jemez watersheds as Outstanding National Resource Waters.

New Mexico Trout is a three hundred fifty-member-strong, 501(c) 3, local, all-volunteer organization dedicated to preserving and improving trout habitat and trout fishing in the state of New Mexico. Our mission statement succinctly expresses this commitment: *New Mexico Trout is dedicated to the preservation and enhancement of trout fishing in New Mexico’s waters through restoration of riparian habitats and through the education of the public about trout fishing and the value of trout habitats.*

We believe that enjoyment of fly fishing also brings with it the obligation to give something back to the environment that supports it. Working jointly with organizations such as the USFS, the Valles Caldera National Preserve, NM Game and Fish Department, and the BLM, each year our group adopts a number of volunteer conservation projects to restore and protect riparian areas along New Mexico’s coldwater streams. We demonstrate through these actions our strong interest in the water quality and riparian health of New Mexico’s trout streams and lakes.

Collectively, our organization may have some of the most comprehensive, first-hand knowledge of these waters in New Mexico. Our members have spent countless hours exploring even the most remote reaches of the State’s coldwater streams and lakes in search of special fishing spots. We have hiked and waded most of the waters that are the subject of this petition, and we know how special they are. Floating a fly to wild, stream-bred trout in a beautiful wilderness setting is an opportunity that everyone should be able to experience. We work to ensure that our children and grandchildren will have these same opportunities we do.

ONRW status for these streams will provide benefits beyond those already conferred by other laws and regulations. ONRW-designated waters will receive an extra layer of protection against degradation of water quality, which in turn will benefit aquatic habitat and the fish that depend on it. A previous New Mexico State agency document succinctly makes the case for ONRW protection. “Outstanding National Resource Water designation is a precautionary measure for the future, and its emphasis is prevention of water quality degradation. Regardless of the threats

that these waters may or not face in the future, it is important for the economy and the ecology of New Mexico to keep these waters clean.” Non-point source pollution is an issue in some of these waters. Backpacker camps and fire rings that are too close to the water, banks eroded by trailing cattle, and trash left by hikers and anglers are examples where no single action is particularly harmful to water quality, but where collectively they can be. With ONRW status and proper publicity, it is possible that people will be a little more thoughtful of their individual behavior and water quality will benefit. The non-degradation standard will give us a benchmark against which we can measure water quality over time to ensure that the health of a given body of water is maintained.

In summary, we strongly urge the Commission to designate the proposed streams in the Rio Grande, Cimarron, Chama, and Jemez watersheds as Outstanding National Resource Waters. NM Trout members believe that this extra protection will help preserve the character of these mountain streams for future generations. This is important to us because we treasure the clear, cool waters in northern New Mexico mountain streams that harbor the trout that we value.

Sincerely yours,

A handwritten signature in cursive script that reads "Ronald Loehman".

Ronald E. Loehman
Conservation Chairman
ronloehman@gmail.com
(505) 328-1489



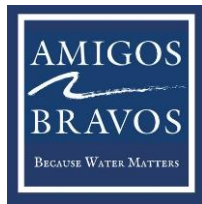
November 29, 2024

New Mexico Environment Department
Water Quality Control Commission

Trout Unlimited is a nationwide volunteer non-profit organization with 300,000 members in 37 states. New Mexico has 4 chapters within the state with about 1200 members. I am writing you on behalf of the Bosque Chapter of Trout Unlimited based here in Albuquerque. Our mission is to conserve, protect and restore New Mexico's cold-water fisheries while building community. The Bosque Chapter has over 600 dedicated members. Our home watershed is the Jemez and San Antonio River and creek. We not only work in the Jemez but help all over the state. Bosque TU fully supports all the Outstanding National Resource Waters nominations and urges the WQCC to grant ONRW designation to these important waters. The nominated streams include some of the best trout fishing streams in the state. Protecting these streams will ensure that current and future generations of New Mexicans and visitors will enjoy clean waters filled with healthy, native species of trout.

We focus on river habitat and trout populations; we also recognize the multiple benefits that clean water creates. ONRW designation will not only protect riparian habitat and wildlife; it will also have a positive impact on local economies, help provide safe drinking water, support agriculture, and preserve traditional water uses and users like Acequias.

Harris Klein
Bosque Chapter of Trout Unlimited
712 Charles Place NW
Los Ranchos, NM 87107



WATER IS LIFE.
It's Our Duty to Protect It.

Water Quality Control Commission
1190 Saint Francis Drive
Suite # South 2102
Santa Fe, New Mexico 87505
Submitted via SmartPortal

Re: WQCC 24-26(R) – New Mexico Environment Department's 2024 Petition to Nominate Surface Waters Designed as Special Trout Waters, or Wild & Scenic Rivers, or Located within a Wilderness, Park, Monument or Refuge as Outstanding National Resource Waters

Dear Commission,

Amigos Bravos is pleased to support New Mexico Environment Department's (NMED) 2024 Outstanding National Resource Waters (ONRW) Nomination. ONRWs are a critical tool in protecting the water quality of New Mexico's streams, especially in response to the recent Supreme Court Sackett vs EPA decision which removed federal protections for up to 95% of our state's rivers and streams and 88% of our state wetlands. ONRW designations protect traditional community water uses by stopping new and increased water pollution while protecting pre-existing uses, even if they are sources of historic impacts. Once a waterbody is designated as an ONRW it is protected from new water quality pollution from mining, development, transportation, industrial, and other sources. Nominating the streams included in NMED's 2024 Designation will play a significant role in maintaining the health of New Mexico's ecosystems and the communities who rely upon them.

The nominated streams, most of which are Special Trout Waters, provide some of the best trout habitat and fishing opportunities in the state. Therefore, protecting water quality in the nominated waters directly supports our growing outdoor recreational economy. Additionally, the nominated waters with our Wilderness, Parks, Monuments, and Refuges support the same outdoor economies while also providing critical habitat to keystone wildlife species and flora throughout New Mexico's watersheds.

Amigos Bravos commends NMED's efforts to collaborate with stakeholders across the state and joins the large coalition of community organizations, tribal communities, state and local government officials, farmers and ranchers, and recreationists in respectfully requesting the Water Quality Control Commission safeguard the water quality of New Mexico's streams by formally approving the entire nominated list as ONRWs under the Federal Clean Water Act at their December 10th, 2024 hearing.

Please let me know if you have any questions regarding our support of this nomination.

Respectfully,

Amigos Bravos | PO Box 238 | 114 Des Georges Place | Taos, NM 87571 | 575.758.3874



amigosbravos.org



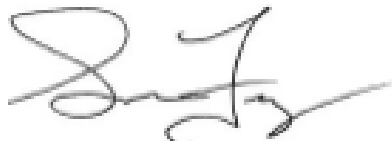
facebook.com/amigosbravos



Twitter.com/amigosbravos1



instagram.com/amigosbravos

A handwritten signature in black ink, appearing to read 'S. Fry', with a stylized, flowing script.

Steven Fry
Policy and Project Specialist
Amigos Bravos



November 22, 2024

The New Mexico Water Quality Commission
Harold Runnels Building,
1190 St. Francis Dr. Suite N4050
Santa Fe, NM 87505

RE: Docket # 24-46 (R). Support for the New Mexico Environment Department's nomination of 245 river miles for Outstanding National Resource Waters protections under the Clean Water Act (33 U.S.C Chapter 26)

Dear Commissioners:

On behalf of The Pew Charitable Trusts (Pew), I am writing in regard to Docket # 24-46 (R) to express Pew's support for the New Mexico Environment Department's (NMED) petition to designate streams that meet New Mexico's criteria at 20.6.4.9.B(1) NMAC ("Criteria One Waters") as Outstanding National Resource Waters 20.6.4.9.D NMAC ("ONRWs"). The forty-six streams totaling over 250 miles of waterways nominated by NMED include Criteria One Waters across the Rio Grande, Cimmarron, Chama, and Jemez watersheds which provide critical watershed function for New Mexico Special Trout Waters, Wild & Scenic Rivers, Wilderness Areas, National Monuments, and State Parks. Criteria One Waters are waterbodies that have already been identified as important to New Mexico or the nation, such as special trout waters or waters in state or federal parks. ONRW protections would provide much needed water quality protections to these important water resources.

Pew's U.S. Environment Program aims to conserve ecologically and culturally significant public landscapes by collaborating with local communities, businesses, government officials, and other stakeholders to achieve balanced, commonsense policy at the federal and state level. The maintenance of outstanding waters and the habitats they support is a vital component of this work and we have partnered with stakeholders across New Mexico on a variety of on-the-ground initiatives aimed at maintaining high quality water and increasing aquatic connectivity.

Pew believes that in addition to the critical services these waters provide to sensitive ecosystems, there are a myriad of benefits they provide for New

Mexicans. Protecting these waters as ONRWs will help sustain the agriculture dependent on these systems, including the farming and ranching within New Mexico's 400-year-old acequia communities. The proposed ONRWs are also critical to the health and well-being of the New Mexicans who rely upon them for their drinking water. Protecting these rivers is also good for the state's economy. According to the U.S. Department of Commerce's Bureau of Economic Analysis, outdoor recreation contributes \$2.4 billion annually to New Mexico's economy. The Bureau found that fishing and hunting support almost 8,000 jobs in New Mexico, contributing more than \$51 million in state and local taxes; By protecting clean water, we help preserve New Mexicans' way of life and, the State's rich cultural heritage, and the recreation economy.

Finally, none of the nominated segments are on private land and they do not impact already-existing water rights and uses, including existing irrigation, grazing, and mining.

Pew commends NMED's efforts to collaborate with stakeholders and generate support for the nomination from community members, local governments, farmers, ranchers, and water conservation groups as well as the robust public comment period held earlier this year to arrive at these nominated segments.

Pew joins the large coalition of community organizations, Tribal governments, state and local government officials, farmers and ranchers, and recreationists in respectfully requesting that the Water Quality Control Commission safeguard the water quality of these waters by formally approving them as Outstanding National Resource Waters under the federal Clean Water Act at the Commission's December 10, 2024, hearing.

Sincerely,
Patrick Lane,
Senior Manager, The Pew Charitable Trusts

A handwritten signature in dark ink, appearing to be 'Patrick Lane', written in a cursive style.

CONTACT:

141 E. Palace Ave, Suite 200
Santa Fe, NM 87501
WesternResourceAdvocates.org

December 9, 2024

Water Quality Control Commission
State of New Mexico
1190 St. Francis Drive, Suite S-2102
Sante Fe, New Mexico 87505

Re: WQCC 24-46 (R) Outstanding National Resource Waters, 20.6.4.9.D NMAC.

Dear Water Quality Control Commission:

On behalf of Western Resource Advocates, I strongly urge the Water Quality Control Commission (Commission) to designate as Outstanding National Resource Waters (ONRWs) the 256.5 river miles in the Rio Grande, Rio Chama, Cimmaron, Pecos, and Jemez watersheds nominated by the New Mexico Environment Department (NMED). Western Resource Advocates is a nongovernmental organization that has, for decades, worked to protect and promote the water quality, stream flows, and habitat health of and equitable access to New Mexico's surface waters. As the nominating petition makes clear, the identified waters qualify for the highest water quality protection state regulations afford because of the significant value these streams provide to New Mexico's water supply, wildlife and recreational opportunities.

Initially, as dictated by 20.6.4.9(A)(1) NMAC, NMED has properly petitioned the Commission to designate 256.5 New Mexico river miles as ONRWs. In Re: Petition to Nominate Surface Waters as Outstanding National Resource Waters, 2024 (Petition). At the core of the Petition is a scientific analysis of how the nominated waters meet the criteria of 20.6.4.9(B) NMAC and so qualify as ONRWs. 20.6.4.9(B)(1) NMAC provides that an ONRW designation is appropriate when the water is a significant attribute of a state special trout water, national or state park, national or state monument, national or state wildlife refuge or designated wilderness area, or is part of a designated wild river under the federal Wild and Scenic Rivers Act.

As the petition establishes, each of the nominated stream segments satisfies at least one element of this provision, while several meet more than one. Petition at 5-6, Table 1. Some of the waters are fundamental parts of river networks that are already subject to protective designations and uses; others have been nominated because they lie within landscapes that have been distinguished because of their important and unique attributes. As these classifications reflect, the nominated segments provide critical wildlife and plant habitat and outstanding recreation, as well as protect water quality, thereby contributing to local economies and community well-being. For these reasons, the nominated waters also have "exceptional recreational or ecological significance" and so qualify as ONRWs pursuant to 20.6.4.9(B)(2) NMAC.

More specifically, 63% of the nominated waters are classified as Special Trout Waters or Wild and Scenic Waters, indicating that these stream segments have already been identified as possessing outstanding values. Petition at 6. Special Trout Waters safeguard native trout populations and provide superior angling opportunities precisely because they are “outstandingly remarkable,” stream segments classified as Wild and Scenic Rivers. Although these segments are already protected to some degree, the Petition argues convincingly that the ONRW water quality-based safeguards be extended to these waters to further safeguard the remarkable qualities that qualified them for their existing designations. Petition at 6-7. Other waters are in Wilderness and Wilderness Study Areas, National Monuments, State and Historic Parks, a Wildlife Management Area, and a National Preserve. Petition at 4-5. Each of these waters therefore serves as a fundamental component of the terrestrial and aquatic habitats, opportunities for solitude and conservation goals embodied by these lands. Once again, maintaining the quality of these waters will preserve the very attributes that have led to the decisions to distinguish them as especially important areas. As the Petition establishes, the nominated river miles meet both the 20.6.4.9(B)(1) & (2) NMAC criteria.

The Petition also concludes that designating the river miles as ONRWs will not have adverse impacts on New Mexico’s economy. Rather, the designations will promote state interests by mitigating the harmful effects of climate change while protecting downstream water supplies, agriculture, recreation and cultural and other important uses. Petition at 14.

Finally, it is appropriate to acknowledge that designating an ONRW protects existing water quality from degradation. 20.6.4.8(A)(3) NMAC. However, existing land uses controlled by best management practices; acequia operation, maintenance and repair; temporary activities undertaken to further public health or safety; and watershed restoration operations are permitted in an ONRW. 20.6.4.8(A)(3)(a)-(e) & (A)(4) NMAC. Thus, designating the nominated waters as ONRWs strikes an appropriate balance between safeguarding water quality for future generations and allowing uses and activities important to New Mexicans.

Thus, as the Petition confirms, a decision to designate the nominated waters as ONRWs will: 1) mitigate the impacts of climate change; 2) safeguard traditional water uses from degradation from threats such as mining, waste disposal and overuse; 3) preserve and promote clean water supplies for drinking, agriculture and economic stability; 4) protect habitats and the wildlife that depends on them; and, 5) enhance recreational opportunities and New Mexico’s outdoor recreation economy. Further, the proposed designations enjoy widespread support from New Mexico’s citizenry, including local governments, farmers, ranchers, outdoor enthusiasts and other community members. Based on these considerations, we urge the Commission to designate these invaluable resources as ONRWs to ensure the outstanding attributes they exhibit are preserved and conserved today and into the future.

Brittany Fallon, PhD
Policy Manager, Western Lands
Western Resource Advocates



December 6, 2024

Dear Water Quality Control Commission,

I am writing in regard to Docket # 24-46 (R) – “The New Mexico Environment Department's petition to designate 245 miles of stream that meet New Mexico's criteria at 20.6.4.9.B(1) NMAC (“Criteria One Waters”) as Outstanding National Resource Waters (“ONRWs”)”. Criteria One Waters are waterbodies that have already been identified as important to New Mexico or the nation, such as special trout waters or waters in state or federal or national parks. ONRW protections would provide much needed water quality protections to these important water resources.

In the light of the recent Supreme Court's Sackett Decision, it is imperative that New Mexico protect the water quality of our streams. ONRW protections prohibit increased pollution to our waters while ensuring traditional and historic uses. These waters are the lifeblood for New Mexicans, serving as water sources for downstream domestic use, acequias and irrigation needs, and recreational activities that draw visitors from all over the world to New Mexico. In addition, these waters ensure the integrity of critical habitat for plants and wildlife that make New Mexico the Land of Enchantment. Our culture, economy, and ecosystems all rely on clean water and this designation will protect these streams for today's residents as well as for future generations.

Therefore, I join the large coalition of community organizations, tribal communities, state and local government officials, farmers and ranchers, and recreationists in asking the Water Quality Control Commission to safeguard the water quality of these waters by formally approving them as Outstanding National Resource Waters under the federal Clean Water Act at their December 10th, 2024, hearing.

Please let me know if I can be of further assistance in your decision-making upon this issue.

Thank you,

[Signatures of 558 New Mexico Residents Follow on Subsequent Pages]

No.	First Name	Last Name	State	Zip Code
1	Carol	A Sassaman	NM	88041
2	Gayle	Abbott	NM	88240
3	Becky	Abbott	NM	87507
4	Rebecca	Abbott	NM	87507
5	Jean	Adams	NM	87110
6	Gregory	Aguilar	NM	88130
7	Sandra	Almand	NM	87107
8	Magda	Altman	NM	87505
9	Joanna	Angie	NM	87506
10	Jan	Ankerson	NM	87110
11	Sara	Annon	NM	87507
12	Linda	Arbogast	NM	87144
13	Barbara	Arnoth	NM	87508
14	Arnold	Atkins	NM	87508
15	Jack	Atkins	NM	87122
16	Rudy	Baca	NM	87120
17	Robert	Bachicha	NM	87507
18	Bren	Bacon	NM	88061
19	David	Bacon	NM	87505
20	Joan	Bacon	NM	88061
21	Ann	Bagley	NM	87144
22	Joel	Baker	NM	87124
23	Nina	Bar-Giora	NM	87557
24	Tanya	Barlow	NM	88345
25	Vernon	Batty	NM	88047
26	Sherry	Beatty	NM	87047
27	John	Belknap	NM	87043
28	Victoria	Bell	NM	87083
29	Margaret	Bell	NM	87107
30	Judith	Benkendorf	NM	87501
31	Eileen	Benner	NM	88049
32	Barbara	Bennett	NM	87901
33	Mike	Benson	NM	87510
34	Jeff	Berg	NM	87508

35	Bo	Bergstrom	NM	88061
36	Joan	Berish	NM	87047
37	Budd	Berkman	NM	87043
38	Russell	Besette	NM	87048
39	Alma	Best	NM	87505
40	Ariel	Bickel	NM	87108
41	Kelsey	Bicknell	NM	87110
42	Bethany	Bigler	NM	87505
43	Mary	Bissell	NM	87144
44	Uphoria	Blackham	NM	87112
45	Willis	Blackmore	NM	87529
46	Diane	Bloom	NM	87144
47	Tim	Blose	NM	87505
48	Karen	Boehler	NM	88201
49	Alicia	Bomhoff	NM	87571
50	Larry	Bonura	NM	87532
51	John	Boomer	NM	87021
52	Hailey	Booth	NM	87008
53	Peg	Borchardt	NM	87123
54	Chris	Bouajila	NM	87107
55	Candace	Boulay	NM	88001
56	Penelope	Bourdet	NM	87507
57	David	Bradbury	NM	87501
58	Sally	Brant	NM	87532
59	Candace	Breen-Lee	NM	88061
60	Matthew	Brennan	NM	87108
61	Nodiah	Brent	NM	87505
62	Dorothy	Brethauer	NM	87123
63	Lura	Brookins	NM	87504
64	Ann	Brooks	NM	87529
65	Sarah	Brown	NM	87083
66	Richard	Brown	NM	87144
67	James	Brown	NM	87144
68	Doug	brown	NM	87505
69	Mary	Brown	NM	88012

70	Dr. Joseph	Brownrigg	NM	87507
71	AnJanette	Brush	NM	87514
72	Linda	Buchser	NM	87501
73	Lynne	Bundesen	NM	87507
74	David	Burling	NM	87540
75	Chris	Burns	NM	87510
76	Ruth	Burstrom	NM	87122
77	Karen	Buxbaum	NM	87506
78	J	Bystrom	NM	87501
79	Chris	Calvert	NM	87501
80	Debra	Cameron	NM	87015
81	Patricia	Cardona	NM	87505
82	Jacqueline	Cardona	NM	87501
83	David	Carmichael	NM	88007
84	Rodney	Carnes	NM	87047
85	Dianne	Carrell	NM	87505
86	Walter	Carter	NM	88053
87	Heather	Castello	NM	88061
88	Ted	Chagaris	NM	87505
89	Terry	Chatterton	NM	87124
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91	Meredith	Cherven-Holland	NM	87112
92	Matthew	Chinchilla	NM	87120
93	Janie	Chodosh	NM	87501
94	Aaron	Citrin	NM	87106
95	Harriett	Clementson	NM	87043
96	John	Cochran	NM	87106
97	Bonnied	Coe	NM	87506
98	Beth	Cohen	NM	87102
99	Mary Lee	Colin	NM	87506
100	Patrick	Colvin	NM	87552
101	Loralee	Cooley	NM	87120
102	Ernestine	Coppedge	NM	88210
103	JC	Corcoran	NM	87535

104	Susan	Cote	NM	87048
105	Lori	Covell Troncoso	NM	87031
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108	Roxanne	Darling	NM	87508
109	Robert	Davis	NM	87010
110	Gregory	Davis	NM	87508
111	Robert	Davis	NM	87010
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115	Rey	Deveaux	NM	87580
116	Joan	Dickerson	NM	87507
117	B. Thomas	Diener	NM	87112
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122	DeeDee	Downs	NM	87505
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145	Kristina	Fisher	NM	87501
146	Robert	Foehring	NM	87508
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184	John	Gregory	NM	87506
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186	Sandra and Glenn	Griffin	NM	88061
187	Ronald	Groves	NM	88061
188	Jana	Gunnell	NM	87571
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194	William	Harker	NM	87506
195	Lisa	Harris	NM	87107
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209	Gudrun	Hoerig	NM	87505
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211	Michelle	Hoffman	NM	87507
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213	Cristy	Holden	NM	87571
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262	Monique	Kueker	NM	87113
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363	Christine	Otto	NM	87501
364	Nathaniel	Owings	NM	87501
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449	Wesley	Sisson	NM	87505

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453	Stevie	Smaltz	NM	87505
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474	Bill	Stern	NM	87505
475	Sara	Stevens	NM	87701
476	Michael	Stevens-Chavez	NM	87701
477	Melissa	Stoller	NM	87574
478	Marilyn	Stoops	NM	87108
479	Signe	Stuart	NM	87508
480	Barbara	Stubbs	NM	87507
481	Martha	Sturgis	NM	87109
482	Cathie	Sullivan	NM	87506
483	S.	Sullivan	NM	87508

484	Margaret Mary	Sullivan-Blanch	NM	87505
485	Kristin	Swim	NM	87571
486	Barbara	Swyden	NM	87124
487	Marilynn	Szydlowski	NM	87111
488	Brent	Taft	NM	87047
489	Gail	Takeshita	NM	87505
490	Thomas	Talbot	NM	88021
491	Jonathan	Tanis	NM	87102
492	Yvette	Tapp	NM	87506
493	Shari	Tarbet	NM	87120
494	Annie	Taylor	NM	87109
495	Gregg	Taylor	NM	87144
496	Fabiola D	Teter	NM	87571
497	John	Thayer	NM	87712
498	Anna	Thomas	NM	87501
499	Russell	Toal	NM	87505
500	Joseph	Toledo	NM	87024
501	John	Tomas	NM	88345
502	Cheryl	Tomlin	NM	87112
503	Guy	Tool	NM	87121
504	Rosario H	Torres	NM	87505
505	Chris	Townley	NM	87529
506	Kateland	Townley	NM	87529
507	Steve	Townsend	NM	87701
508	John	Traceski	NM	87108
509	Hy	Tran	NM	87122
510	Ann Ellen	Tuomey	NM	87529
511	David	Tynan	NM	87068
512	Annette	Tynan	NM	87068
513	Kristin	Ulibarri	NM	87571
514	James	Ummel	NM	87506
515	Terry	Urioste	NM	87125
516	Robert	Valdez	NM	87532
517	Jennifer	Valentine	NM	87001
518	Ditas	Valenzuela	NM	87124

519	Carol	Vigil	NM	87532
520	zoe	viles	NM	87505
521	maryse	vrambout	NM	87501
522	LeRoy	W	NM	87059
523	Mark	Walch	NM	87043
524	Rebecca	Walding	NM	87010
525	Norman	Wallace	NM	87508
526	Mary	Walls	NM	88030
527	Monika	Walter	NM	88049
528	Chrissie	Waquie	NM	87110
529	L.	Watchempino	NM	87034
530	Matthew	Watford	NM	88011
531	Theresa	Watson	NM	87120
532	Allison	Webster	NM	87008
533	Hasso	Weiland	NM	87047
534	Carol	Weinreich	NM	87059
535	Peggy	Wells	NM	87111
536	Christopher	Wentz	NM	87048
537	R.A.L.	West	NM	87571
538	Kathleen	Westlund	NM	87507
539	Denise	Wilder	NM	87567
540	L.L.	Wilkinson	NM	87571
541	Joyce	Williams	NM	87506
542	Blaine	Wimberly	NM	87008
543	Rachel	Wirth	NM	87048
544	Ciera	Wiser	NM	87507
545	Rebecca	Wlthers	NM	87501
546	Emily	Wolf	NM	87507
547	Jon	Wolfe	NM	87506
548	Starr	Woods	NM	87505
549	Nancy	Woodward	NM	87505
550	Scott	Workinger	NM	87112
551	Cameron	Wraye	NM	87507
552	margo	wyse	NM	88049
553	Dale	Yamutewa	NM	87121

554	Mary	Yardley	NM	88062
555	Moises	Zamora	NM	87505
556	Linda	Zat	NM	88061
557	Charlene	Zdunczyk	NM	87144
558	Nancy	Zimmerman	NM	87574