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RECEIVED

MAR 14 2003

SURFACE WATER
QUALITY BUREAU

Date: March 13, 2003
Refer to: RRES-WQH: 03-061

Mr. James Davis
Surface Water Quality Bureau Chief
New Mexico Environment Department
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87502

**SUBJECT: LOS ALAMOS NATIONAL LABORATORY COMMENTS ON STATE
OF NEW MEXICO STATEWIDE WATER QUALITY MANAGEMENT
PLAN, INTRODUCTION AND WORK ELEMENT 11**

Dear Mr. Davis:

Los Alamos National Laboratory is pleased to comment on the State of New Mexico Statewide Water Quality Management Plan, Introduction and Work Element 11, January 14, 2003, Version. The Laboratory appreciates having the opportunity to attend the public meeting held in Santa Fe on February 17.

Attachment A contains the Laboratory's comments on the draft plan. The Laboratory would like to complement the Surface Water Quality Bureau on the continued improvement of the Statewide Water Quality Management Plan. The proposed revisions provide useful background information and make the document more accessible for the general public. Our comments consist largely of suggestions that might clarify portions of the document, or suggestions where the use of graphics may allow simplification of the text.

If you have any questions regarding the attached comments, please call Michael Saladen at (505) 665-6085.

Sincerely,

A handwritten signature in black ink that reads "Steven Rae".

Steven Rae
Group Leader
Water Quality & Hydrology Group

SR:FF/yg

Attachments: a/s

Cy: Louis Rose, Montgomery and Andrews, Santa Fe, NM, w/att.
Joseph Vozela, DOE/OLASO, w/att., MS A316
Gene Turner, DOE/OLASO, w/att., MS A316
Lisa Cummings, DOE/OLASO, w/att., MS A316
Beverly Ramsey, RRES-DO, w/att., MS J591
Kenneth Hargis, RRES-DO, w/att., MS J591
Doug Stavert, RRES-EP, w/att., MS J591
Charlie Nylander, RRES-GP, w/att., MS M992
Mike Saladen, RRES-WQH, w/att., MS K497
Deborah Wiotte, LC-ESH, w/att., MS A187
Phil Wardwell, LC-ESH, w/att., MS A187
RRES-WQH File, w/att., MS K497
IM-5, w/att., MS A150

**Los Alamos National Laboratory Comments on
Proposed Revisions to the Statewide Water Quality Management Plan
Introduction – January 14, 2003, Version**

The proposed revision of the Introduction to the Statewide Water Quality Management Plan (received at the February 17, 2003, public meeting in Santa Fe) is an improvement to the version adopted by the Water Quality Control Commission in December 2002. It provides additional explanation that is helpful for readers who are not familiar with water quality management. The following suggestions on the organization and content of the introduction are intended to improve the reader's comprehension of this complex subject.

Historical Perspective: Consider having a graphic representation of a time line to show the significant federal actions on clean water. Further, consider showing on the same timeline, the New Mexico developments in response to the federal actions. This section does a good job of explaining what occurred on the federal level, but the actions within the state of New Mexico are less clear. If there was a graphic, the text could be shortened to indicate the changing federal and state statutory mandates.

Institutional Roles and Responsibilities: Consider moving this section to follow "Water Quality Monitoring Assessment and Reporting". The order of presentation in this section would then be: background, what New Mexico does (Water Quality Monitoring and Assessment), and then who is responsible for doing it (Institutional Roles and Responsibilities). This section might be more clear if the descriptions were divided by federal and state roles/responsibilities and a graphic was presented showing the different federal and state roles. Within the state roles, the descriptions of the NMED bureaus in the draft does not specifically address their role in water quality management as described in the Water Quality Management Plan. We suggest that the Surface Water Quality Bureau should be listed first among the state agencies since it has primary responsibility, which should be clearly indicated. We also suggest that you indicate in the FOD section that the Liquid Waste program regulates septic tanks and other small domestic wastewater systems. Consider adding a graphic with an organization chart, showing the bureaus, with a bulleted description of their mission (the information currently in the text). The text could then be supplemented with focused information about what the bureaus are responsible for in this plan, with specific references to the work elements.

Water Quality Monitoring, Assessment, and Reporting: Consider a broadened section that is an executive summary of what the state does to manage water quality. The "thumbnail" sketches could be two to three sentences or a paragraph and include a reference to the work element where the activities are described in more detail. Note that much of the information is already here and this would be complete with some additions. This section could also describe the relationship between the Water Quality Management Plan (describes what New Mexico does to manage water quality) and the Continuing Planning Process (describes how New Mexico manages water quality).

**Los Alamos National Laboratory Comments on
Proposed Revisions to the Statewide Water Quality Management Plan
Work Element 11 – January 14, 2003, Version**

The proposed Work Element 11 of the Statewide Water Quality Management Plan (received at the February 17, 2003, public meeting in Santa Fe) provides information on the opportunities for public comment on water quality program elements. The work element could be improved with additional explanation of how the public input works. It would be helpful to have a graphic that shows the progression all the way from a petition to the WQCC, through the hearing process, to deliberations and adoption of proposed changes. The graphic could highlight junctures where any party wishing to have input has the opportunity to do so. This process is described in the WQCC guidelines, and the Work Element could refer to the guidelines and include a hyperlink. The graphics showing the TMDL public participation could also be presented and/or referenced in this section. A description of how NMED responds to comments received and how the comments and responses are communicated to the WQCC would be very helpful. Overall, the proposed Work Element 11 does a good job of describing NMED public participation responsibilities. However, additional information would make useful for the public to know how they can take advantage of the public participation opportunities described in the work element.