

July 13, 2021

By email: pamela.jones@state.nm.us

Re: Public Comments for Triennial Review - Docket No. WQCC 20-51(R)

Dear New Mexico Water Quality Control Commissioners

My name is Sunny DeYoung; my husband and I are participant farmers of the Rosalio Lopez Acequia outside of Tularosa, New Mexico.

Traditional rural communities such as acequias and land grant-mercedes are experiencing rapid land use development that negatively impacts our water resources. Impacts include potential risks of groundwater contamination and increased degradation of surface water quality from municipal wastewater treatment facilities and industrial water users, such as oil & gas, mining, and national laboratories. The state Triennial Review is therefore critical to ensure our precious water is protected for current and future generations of acequeros.

I support the proposals by Communities for Clean Water (CCW) and the Gila Resources Information Project (GRIP) to provide more protections of New Mexico's waters. Specifically, I urge the New Mexico Water Quality Control Commission (WQCC) to:

- Adopt CCW's and GRIP's proposed definition of climate change that identifies human activities as the major cause of climate change and make clear that the purpose of these regulations is to address climate change;
- Adopt CCW's and GRIP's proposed definition of **Emerging Contaminants** especially as they now pertain to the new cannabis and established pecan industries.
- Adopt language that clearly gives NMED authority to require monitoring for **Emerging Contaminants**;
- Add PFAS to the definition of **Emerging Contaminants**;
- Not limit the definition of **Toxic Pollutants** to the EPA list of toxic pollutants. New Mexico should not cede its authority to identify and regulate toxic pollutants;
- Oppose the efforts of Los Alamos National Laboratory (LANL) to weaken the human health-organism only (HH-OO) criteria;
- Not eliminate requirements to monitor for **PFAS**, a group of harmful 'forever' chemicals.
- Express dismay that LANL is spending taxpayer dollars on lawyers to fight state efforts protecting waters from toxic and persistent pollutants.

Thank you for your careful consideration of my comments.

Sincerely,

Sunny DeYoung

15 Baca Farms Rd.

Tularosa, NM 88352

From: [Juanita J. Lavadie](#)
To: [Jones, Pamela, NMENV](#)
Subject: Public Comments for Triennial Review - Docket No. WQCC 20-51(R)
Date: Monday, July 12, 2021 1:56:34 PM

July 12, 2021

Pamela Jones, WQCC Administrator
New Mexico Environment Department
P.O. Box 5469
Santa Fe, NM 87502

Re: Public Comments for Triennial Review - Docket No. WQCC 20-51(R)

Dear Ms. Jones:

I support the proposals by Communities for Clean Water (CCW) and the Gila Resources Information Project (GRIP) to provide more protections of New Mexico's waters. Specifically, I urge the New Mexico Water Quality Control Commission (WQCC) to:

- adopt an adequate definition of climate change that identifies human activities as the major cause of climate change. *See* the CCW and GRIP proposed changes to definitions.
- state in the regulations that a purpose of the regulations is to address climate change.
- support adoption of CCW and GRIP proposed definition of **Emerging Contaminants**.
- support adoption of language that clearly gives NMED authority to require monitoring for **Emerging Contaminants**.
- support adding PFAS to the definition of **Emerging Contaminants**.
- not limit the definition of **Toxic Pollutants** to the EPA list of toxic pollutants. New Mexico should not cede its authority to identify and regulate toxic pollutants.
- oppose efforts of Los Alamos National Laboratory (LANL) to weaken human health-organism only (HH-OO) criteria. In order to protect public health and New Mexico communities, ensure fish we catch in rivers, streams, reservoirs, and lakes are safe to eat.
- not eliminate requirements to monitor for **PFAS**, a group of harmful 'forever' chemicals. PFAS have been detected at LANL. PFAS, or per- and poly-fluoroalkyl substances, have been around since the 1940s and are found in Teflon and in military-grade fire retardants.
- not eliminate the requirement that LANL monitor for **PCBs** with sufficient accuracy to determine whether state standards are violated.
- express its dismay that LANL is spending taxpayer dollars on lawyers to fight state efforts to protect waters from toxic and persistent pollutants.

Thank you for your careful consideration of my comments.

Sincerely,

Juanita J Lavadie <juanita_j_lavadie@yahoo.com>

July 12, 2021

To: New Mexico Water Quality Control Commissioners, via Pamela Jones
(pamela.jones@state.nm.us)

Re: Public Comments for Triennial Review - Docket No. WQCC 20-51(R)

We are members of the Acequia Madre del Rio Lucero and are writing concerning the Triennial Review of New Mexico's Surface Water Quality Regulations. We support the proposals by Communities for Clean Water (CCW) and the Gila Resources Information Project (GRIP) to provide more protection for New Mexico's waters.

We believe that the New Mexico Water Quality Control Commission (WQCC) should:

- Adopt CCW's and GRIP's proposed definition of climate change that identifies human activities as the major cause of climate change and make clear that the purpose of these regulations is to address climate change;
- Adopt CCW's and GRIP's proposed definition of Emerging Contaminants.
- Adopt language that clearly gives NMED authority to require monitoring for Emerging Contaminants;
- Add PFAS to the definition of Emerging Contaminants;
- Not limit the definition of Toxic Pollutants to the EPA list of toxic pollutants. New Mexico should not cede its authority to identify and regulate toxic pollutants;
- Oppose the efforts of Los Alamos National Laboratory (LANL) to weaken the human health-organism only (HH-OO) criteria;
- Not eliminate requirements to monitor for PFAS, a group of harmful 'forever' chemicals. Not eliminate the requirement that LANL monitor for PCBs with sufficient accuracy to determine whether state standards are violated; and
- Express dismay that LANL is spending taxpayer dollars on lawyers to fight state efforts protecting waters from toxic and persistent pollutants.

Thank you for this chance to provide input into the process.

Sincerely,

Robert Jensen and Eliza Gilkyson
122 Rim Road
PO Box 87
Arroyo Seco, NM 87514

From: [Rebecca M Summer](#)
To: [Jones, Pamela, NMENV](#)
Cc: howie.morales@nmlegis.gov
Subject: Docket # WQCC 20-51(R) water quality regulations
Date: Monday, July 12, 2021 1:51:32 PM

Dear Ms. Jones:

My friends, family and I here in southwest NM are advocates for stronger water quality protections, strengthen surface water regulations, and **oppose proposed amendments by LANL and NM Mining Association** that will seriously weaken existing surface water regulations.

Below are the five points that we submit to protect our water quality, our health, our lands, our water, and our lives.

1) Oppose a Limited Definition of Climate Change: The New Mexico Environment Department (NMED) is proposing a new definition of “climate change” that doesn’t identify climate change as predominantly human caused.

We urge the Commission to adopt a definition of climate change that identifies human activities as the major cause of climate change and to specify combating climate change as a purpose of the regulations.

2) Support Standards for Contaminants of Emerging Concern: NMED is proposing a new definition of “Contaminants of Emerging Concern” (CEC), while Los Alamos National Laboratory (LANL) and the New Mexico Mining Association (NMMA) are opposing adding a CEC definition and CEC monitoring requirements to the standards. Support adoption of a CEC definition that clearly gives NMED the authority to require monitoring CECs. Support adding PFAS to the CEC definition as an example of CECs. PFAS are perfluoroalkyl and polyfluoroalkyl substances that are a group of man-made chemicals that research has shown to affect reproductive health, increase the risk of some cancers, affect childhood development, increase cholesterol levels, weaken the immune system, and interfere with the body’s hormones. PFAS have been measured in the Gila River.

3) Say “No!” to Toxic Fish: LANL is proposing to substantially limit the number of waters, including waters on LANL’s property, that currently receive protections under the Human Health – Organism Only (HH-OO) criteria for toxic pollutants. These criteria

protect human health by ensuring that pollutants dangerous to human health do not build up in fish and other aquatic life that humans ingest.

Oppose LANL’s proposal to weaken HH-00 criteria because the fish we catch in our rivers, streams, reservoirs, and lakes must be kept safe to eat.

4) Support the Existing Definition of Toxic Pollutants: LANL and the NMMA propose to limit the definition of “toxic pollutant” to only toxic pollutants listed in an outdated EPA list.

New Mexico should not cede its authority to identify and regulate toxic

pollutants based on an outdated federal list of toxic pollutants.

5) Oppose Limited Monitoring for LANL: LANL proposes to limit monitoring to an outdated EPA list of monitoring methods for purposes of permit compliance and enforcement.

This proposal would prevent effective monitoring of PCBs and PFAS.

We express a strong objection that the U.S. Department of Energy and LANL are spending taxpayer dollars to fight state efforts to protect waters from persistent and harmful pollutants.

From: [Deborah Guerra](#)
To: [Jones, Pamela, NMENV](#)
Subject: Public Comment: Keep rivers, streams, reservoirs and lakes safe
Date: Monday, July 12, 2021 7:34:20 PM

- 1) include in the definition of climate change that one of the major causes is human activity and the purpose of regulations is to reduce climate change
- 2) require definition of CECs to monitor standards for CECs including PFAs
- 3) keep fish in rivers, streams, reservoirs and lakes safe to eat by NOT weakening HH-OO criteria
- 4) I support the existing definition of “toxic pollutants”, not the proposed, outdated list
- 5) I oppose limited monitoring for LANL, especially for PCBs and PFAS
- 6) I object to the fact that the DOE and LANL are spending taxpayer \$ to fight State efforts to protect waters

From: [Aurolyn Luykx](#)
To: [Jones, Pamela, NMENV](#)
Subject: Public Comments for Triennial Review - Docket No. WQCC 20-51(R)
Date: Monday, July 12, 2021 7:59:19 PM

Dear Ms. Jones:

I am writing in support of the proposals by Communities for Clean Water (CCW) and the Gila Resources Information Project (GRIP) to provide more protections of New Mexico's water resources. We need effective water protections for our locals businesses such as agriculture and tourism Specifically, I urge the New Mexico Water Quality Control Commission (WQCC) to:

- adopt an adequate definition of climate change that identifies human activities as the major cause of climate change. *See* the CCW and GRIP proposed changes to definitions.
- state in the regulations that a purpose of the regulations is to address climate change.
- support the adoption of the CCW and GRIP proposed definition of **Emerging Contaminants**.
- support adoption of language that clearly gives NMED authority to require monitoring for **Emerging Contaminants**.
- support adding PFAS to the definition of **Emerging Contaminants**.
- not limit the definition of **Toxic Pollutants** to the EPA list of toxic pollutants. New Mexico should not cede its authority to identify and regulate toxic pollutants.
- oppose the efforts of Los Alamos National Laboratory (LANL) to weaken the human health-organism only (HH-OO) criteria. In order to protect public health and New Mexico communities, ensure the fish we catch in rivers, streams, reservoirs, and lakes are kept safe to eat.
- not eliminate requirements to monitor for **PFAS**, a group of harmful 'forever' chemicals. PFAS have been detected at LANL. PFAS, or per- and poly-fluoroalkyl substances, have been around since the 1940s and are found in Teflon and in military-grade fire retardants.
- not eliminate the requirement that LANL monitor for **PCBs** with sufficient accuracy to determine whether state standards are violated.
- express its dismay that LANL is spending taxpayer dollars on lawyers to fight state efforts to protect waters from toxic and persistent pollutants.

As a public official, please do all in your power to keep NM waters clean, safe, and beautiful. Thank you for your consideration.

Sincerely,

Aurolyn Luykx
(915)760-3610

From: [Debi Taylor](#)
To: [Jones, Pamela, NMENV](#)
Subject: New Mexico Water Quality Control Commission (WQCC) Review public hearing on proposed changes to our state surface water quality standards and regulations.
Date: Monday, July 12, 2021 1:23:51 PM

We live in the rural/agricultural valley of San Cristobal in Northern New Mexico. We understand the importance of protecting our ground and surface waters. We can never stop paying attention to and protecting our waters. We are concerned that rapid land use development and inadequate protection for the health of the water will negatively impact our communities, families and livelihoods. Impacts include potential risks of groundwater contamination and increased degradation of surface water quality from municipal wastewater treatment facilities and industrial water users, such as oil & gas, mining, and national laboratories. We strongly support the state Triennial Review as an important way to ensure that our precious water is protected for current and future generations of acequero/as. It is our obligation to protect our precious water every single moment!

Thank you for your efforts!

Chris & Debi Taylor

From: [Guerra](#)
To: [Jones, Pamela, NMENV](#)
Subject: Water Quality Standards
Date: Monday, July 12, 2021 7:37:07 PM

- 1) include in the definition of climate change that one of the major causes is human activity and the purpose of regulations is to reduce climate change
- 2) require definition of CECs to monitor standards for CECs including PFAs
- 3) keep fish in rivers, streams, reservoirs and lakes safe to eat by NOT weakening HH-OO criteria
- 4) I support the existing definition of “toxic pollutants”, not the proposed, outdated list
- 5) I oppose limited monitoring for LANL, especially for PCBs and PFAS
- 6) I object to the fact that the DOE and LANL are spending taxpayer \$ to fight State efforts to protect waters

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dnaguerra@gmail.com