

Pamela Jones, Office of Public Facilitation
New Mexico Environment Department
P.O. Box 5469
Santa Fe, NM 87502

**Please enter these public comments into the record for Docket Number
WQCC 20-51(R)**

On behalf of my children, grandchildren, and all future generations I urge the Commission to:

1. Adopt a definition of climate change that identifies human activities as the major cause of climate change and to specify combatting climate change as a purpose of the regulations.
2. Add an accurate and proactive definition for Contaminants of Emerging Concern (CEC) and CEC monitoring requirements to the standards.
3. Strengthen HH-00 criteria because the fish we catch in our rivers, streams, reservoirs, and lakes must be kept safe to eat.
4. Expand state authority to identify and regulate toxic pollutants to more than what is identified on the EPA list.
5. Expand state authority to assure effective monitoring of PCBs and PFAS.

The U.S. Department of Energy and LANL would be better off spending taxpayer dollars to protect our lands and water instead of using funds to fight state efforts to protect waters from persistent and harmful pollutants.

AGUA ES VIDA!

THANK YOU IN ADVANCE FOR PROTECTING OUR PRECIOUS WATERS.

Victoria Parrill

Victoria Parrill
900 Calle Carmilita
Santa Fe, NM 87505

July 13, 2021

Pamela Jones, WQCC Administrator -- By email: pamela.jones@state.nm.us
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 for New Mexico's waters. Specifically, I urge the New Mexico Water Quality Control Commission (WQCC) to:

- adopt a clear 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 adopting CCW's and GRIP's proposed definition of **Emerging Contaminants**;
- support adopting 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's 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 and to ensure that the fish we catch in rivers, streams, reservoirs, and lakes are safe to eat;
- keep requirements to monitor for **PFAS**, a group of harmful forever chemicals; PFAS, or per- and poly-fluoroalkyl substances found in Teflon and in military-grade fire retardants, have been around since the 1940s and have been detected at LANL;
- keep 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 to protect waters from toxic and persistent pollutants.

Thank you for your careful consideration of my comments.

Sincerely,

Y-M Lee, Ramah, NM

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:

As a subsistence farmer, Parciante on the Martinez Arriba Acequia Association and Board member of the Rio Quemado, Rio en Medio, Rio Frijoles, Rio Santa Cruz Stream System Acequia Association, a member of the Chimayo Mutual Domestic Water Users Association and owner of a private domestic well, I am writing to express my feelings that we must protect water any way we can.

Agua es vida. New Mexico's surface waters are the lifeblood of numerous acequias, sustaining and enriching centuries-old acequias and farming and ranching traditions which depend upon clean water. Acequias have a long history of respect and stewardship of these precious waters. Our intricate customs and traditions, our collective approach to water management, and our unique role in water governance has resulted in extensive empirical and cultural knowledge of numerous New Mexico surface water bodies.

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 therefore 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**.
- 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 your careful consideration of my comments and Communities for Clean Water's rebuttal testimony with proposed changes.

Sincerely,

Serafina Lombardi
Chimayo Resident

From: [Richard Martin](#)
To: [Jones, Pamela, NMENV](#)
Subject: WQCC 20-51 R
Date: Tuesday, July 13, 2021 1:32:54 PM

Thank you for taking public comment.

1. Please follow the science that climate change is for the most part human caused. People have to take responsibility for the changes humans are incurring on this planet and do everything possible to correct mistakes and prevent further damage.
2. The New Mexico Environment Department including Contaminants of Emerging Concern is a small step in the right direction to help monitor chemicals that are man made and directly affect the health of both humans and animals.
3. Fish can become addicted to methanphenimine. Our waters are being contaminated by hormones, antibiotics, chemicals and pharmaceuticals. Regulations for proper disposal should be increased to prevent water pollution. Human Health-Organism Only is not nearly enough protection for waterways.
4. Toxic pollutants change constantly so it is important to not rely on outdated EPA lists.
5. More monitoring is needed on chemicals in addition to PCB's and PFAs in our water. Fresh water is a precious resource that is being depleted. Please protect what water is left for consumption and habitats. Increase New Mexico Water Quality Standards for the benefit of all of us.

I appreciate the opportunity to have input.
Carol A. Martin
Grant County

Sent from [Mail](#) for Windows 10

From: [Susan More](#)
To: [Jones, Pamela, NMENV](#)
Subject: Public Comment on WQCC 20-51(R)
Date: Tuesday, July 13, 2021 9:57:10 AM

July 13, 2021

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

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 *as well as traditionally recognized sources of water pollution.*
- 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. *New Mexico should rely on current science to define toxic pollutants.*
- *oppose the proposed mining operation near Terrero. As a resident near Pecos, I am particularly concerned that the proposed mining operation near Terrero not contaminate the Pecos Watershed.*
- 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.

Thank you for your careful consideration of my comments.

Sincerely,

Susan L. More

46 Silver Feather Trail

Pecos, NM 87552

susleilmore@gmail.com

From: [Melissa Savage](#)
To: [Jones, Pamela, NMENV](#)
Subject: Docket number WQCC 20-51(R)
Date: Tuesday, July 13, 2021 1:15:12 PM

Dear Ms. Jones,

I would like to submit comments on the Triennial Review of New Mexico's Surface Water Quality regulations.

I have the following comments:

1. I support the existing definition of toxic pollutants. We should not limit New Mexico's ability to regulate toxic pollutants in our water, and we should be allowed, as a State, to determine our own standards for clean water.
2. I am very much opposed to changes in the monitoring standards that would allow LANL to limit New Mexico's choices for regulation of toxic substances or allow a relaxation of standards for PCBs and PFAS.
3. As a forest and climate scientist, I am strongly opposed to a redefinition of "climate change" that limits in any way diminishing the responsibility of humans for this global and catastrophic trend. Scientists have very convincingly demonstrated that the trends in climate we are seeing—temperatures exceeding 100° F. all over the US West right now for example, are specifically the result of human activities—carbon emissions from cars, the energy industry, deforestation, and many other sources. Please don't let New Mexico be the one state that is mired in the dark ages about the reasons for climate heating.

Thank you,

Dr. Melissa Savage
1475 Canyon Road
Santa Fe, NM 87501
forests@ucla.edu
(505) 983-8515