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W.C. McIntosh, Assistant Administrator
U.S. National Coordinator Border 2020 Program
United States Environmental Protection Agency
Mcintosh.chad@epa.gov

Re: New Mexico comments on Border 2025

Dear Assistant Administrator McIntosh:

Thank you for the opportunity to provide feedback in the development of the next generation of border programming. I appreciate the United States Environmental Protection Agency (EPA) seeking border states' suggestions and perspectives on both the current and future programs. The New Mexico Environment Department (NMED) is pleased to provide the following comments for your consideration and has identified general recommendations related to the overall border program and direction, and two specific goals NMED would like to see for the border program in the future.

General Recommendations for Border2025:

- 1.) Return to a bottom up approach.** In order for the EPA to determine what state and local priorities are in each border state, and to ensure it is receiving input from all border states, NMED recommends that the EPA should schedule regular listening sessions and engages local communities and state governments in the development of the two-year regional action plans. NMED suggests that EPA consider virtual public engagement and targeted community meetings to better reach constituencies of interest.
- 2.) Ensure subject matter expertise.** The EPA El Paso Border Office often lacks technical staff with knowledge in the fields of atmospheric science, hydrology, environmental health and waste disposal, which can be a detriment to the border programs. At a minimum, the EPA staff should have an intermediate level of knowledge in such fields; alternatively, the EPA may align with its regional offices to bring in necessary and appropriate technical staff. The EPA Border Office staff serve as facilitators, setting up meetings and phone calls, and are strong communicators; however, in order to best serve state and local priorities, NMED recommends more subject matter expertise within the EPA Border Office.
- 3.) Increased frequency of meetings.** Ideally, the National Coordinators Meeting should occur annually, with policy meetings preceding the event. NMED suggests that correlated task forces should increase

meetings or teleconferences to bi-annual or quarterly in order to stay on track with the two-year action goals.

4.) Financial support for state programs. The EPA should provide funding to state agencies for their meaningful participation in Border2025 activities. Without such funding, the NMED may disinvest from participating in Border2025 due to lack of funding.

5.) Align the goals and priorities of Border2025 with the priorities of the Good Neighbor Environmental Board's (GNEB) 19th Report and build on the recommendations of regional sustainability planning and binational collaboration. GNEB does not carry out border region activities, but instead plays an integral role by advising the President and Congress environmental and infrastructure projects in the contiguous states of Mexico, which, if implemented, would improve the quality of life of persons living on the United States side of the border. Border2025 is a fitting vehicle to promote and support many of the recommendations found within GNEB's 19th Report.

Goals for Border2025:

1.) Promote and encourage improvements to boarder water and wastewater facilities. A goal for the Border2025 should be to substantially promote all funding sources available to U.S. and Mexican border communities to improve and upgrade drinking water and waste water infrastructure in the border area. Such funding sources include state, federal, and international opportunities.

2.) Focus on regional environmental impacts associated with life on the border. While major efforts in policy development and national infrastructure planning are considered at the federal level and as a feature of the Good Neighbor Environmental Board, local planning for land and water use in the Paso del Norte region requires attention. The environmental impacts of land use, water flow and distribution along the Rio Grande, and hazardous and non-hazardous waste generation are constant and continually evolving and should be a major focus of Border2025. NMED contends that such a focus would be timely and should transcend politics in order to address the present realities of our border region and communities.

Thank you again for the opportunity to provide feedback and recommendations on the federal/state collaborative border programs. NMED is highly cognizant of the issues facing its border region and strives to continue to both protect and promote such communities.

Respectfully,


James C. Kenney
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