Here’s a sample public comment letter that you can use to submit your concerns to NM Environment Department Secretary James Kenney. Feel free to use the paragraphs that resonant with your concerns – edit them and add your own concerns.

June ­­\_\_, 2019

By email to: James.Kenney@state.nm.us

James Kenney, Secretary

New Mexico Environment Department

P. O. Box 5469

Santa Fe, NM 87502-5469

Re: Keep the NMED DOE Oversight Bureau at Los Alamos in Los Alamos

Dear Secretary Kenney:

I am very concerned that the New Mexico Environment Department (NMED) is even contemplating relocating the Oversight Bureau at Los Alamos National Laboratory (LANL) from Los Alamos to Santa Fe. For over 30 years, the Oversight Bureau has served as the eyes and ears of NMED at LANL and Los Alamos. As a New Mexican, I know the Oversight Bureau’s presence in Los Alamos makes a difference. I have relied on their scientific expertise in air, water, and sediment pollution analysis, their institutional knowledge of LANL operations, which takes years to acquire, and their community outreach.

LANL is a complex site that used radioactive, hazardous and toxic pollutants to do their work, which create wastes that require special handling. Over three times the amount of radioactive, hazardous and toxic waste destined for the Waste Isolation Pilot Plant (WIPP) (6.25 million cubic feet) is already buried in unlined pits, trenches, and shafts at LANL (18 million cubic feet). These wastes are moving through surface water and groundwater to the Rio Grande. More oversight of LANL’s activities is needed, not less.

I understand that NMED will be hosting a public meeting about this matter the week of June 24, 2019. I recommend that the meeting be held in Pojoaque or Española to make it easier for those living downwind communities to travel to the meeting and to fully participate.

I encourage NMED to place ads about the meeting in the Taos News, the Rio Grande Sun, and the Santa Fe papers, place PSAs on radio stations located in the downwind and downstream communities, and to send out an email notification to those on the LANL facility mailing lists that are managed by each NMED bureau.

I encourage NMED to cover the following topics during the meeting:

* explain why NMED is contemplating this change. It cannot be for state budgetary reasons because under the current memorandum of understanding (MOU) between NMED and DOE/LANL, DOE provides a grant of approximately $1.8 million a year to NMED for the Oversight Bureau at LANL. DOE has provided similar grants for decades. No state general funds support the Oversight Bureau.
* explain the current memorandum of understanding (MOU) between NMED and the DOE/LANL. It would be helpful to understand why the agreement was changed from the Agreement in Principle to an MOU.
* explain how and why the Oversight Bureau’s responsibilities changed. Oversight of the releases and environmental impacts of nuclear weapons work at LANL were eliminated from the MOU and/or Agreement in Principle.
* explain the justification for limiting the Oversight Bureau’s work exclusively to environmental management.

My experience with the Oversight Bureau is primarily during the devastating fires on the Pajarito Plateau when the staff demonstrated their dedication to their jobs, community, and the environment. During the 1996 Dome fire, the 2000 Cerro Grande fire, and the 2011 Las Conchas fire, the Oversight Bureau staff did not evacuate. They stayed and monitored the air emissions 24/7. The data is and was invaluable to determine whether I should evacuate. Just thinking about the Oversight Bureau not being located in Los Alamos, causes me to re-live the stress of what happened during the fires, the releases of pollutants into the environment, and the aftermath. The Oversight Bureau doubled their efforts to find out what happened post-fire through dedicated sampling, analysis and reporting, and community outreach.

If the office is moved to Santa Fe, I am concerned about the time and energy/fuel that will be wasted traveling 35 miles between Santa Fe and Los Alamos. There are obvious inefficiencies for the scientists to travel nearly two hours each time they want to do field work in Los Alamos. Over 70 percent of their work is in the field. In a week’s time, there would be a reduction of 25 percent in the fieldwork the Oversight Bureau does – or about a day a week traveling between Santa Fe and Los Alamos.

I am concerned that the subject matter experts within the Oversight Bureau will leave their jobs, creating a vacuum – especially in a year when LANL contaminants will be transported in bountiful snow melt and spring surface water runoff to the Rio Grande, and the Buckman Direct Diversion Project, which provides over 40 percent of Santa Fe’s drinking water. Protect our drinking water – keep the Oversight Bureau in Los Alamos.

I am also concerned that there is only one staffer with a Q clearance to have access to the LANL site – especially during an emergency. All of the Oversight Bureau scientists must have Q clearances in order to fully access the LANL site to do their jobs.

I reiterate: LANL needs more oversight by NMED, not less. The recent egregious examples of using the wrong kitty litter, which former NMED Secretary Ryan Flynn said “blew up WIPP,” and the faulty installation of carbon steel values in pipelines carrying corrosive radioactive liquid waste clearly demonstrate that more oversight of LANL by NMED is needed. May it be so.

Thank you for your careful consideration of my comments.

Sincerely,

cc: Senator Tom Udall

Senator Martin Heinrich

Congressman Ben Ray Lujan

Local media