Communities For Clean Water

June 15, 2015

Evelyn Rosborough
Water Quality Protection Division
U.S. EPA Region 6
1445 Ross Ave., Suite 1200
Dallas, TX 75202
Submitted via email to rosborough.evelyn@epa.gov

Re: EPA's Preliminary Determination that Discharges of Storm Water from MS4s at LANL and Los Alamos County Result in Exceedances of Water Quality Standards and Require Clean Water Act Permit Coverage.

Dear Ms. Rosborough:

Communities for Clean Water (CCW) is a network of organizations whose mission is to ensure that community waters impacted by Los Alamos National Laboratory (LANL) are kept safe for drinking, agriculture, sacred ceremonies, and a sustainable future. Our growing network includes Concerned Citizens for Nuclear Safety (CCNS), Amigos Bravos, Honor Our Pueblo Existence (HOPE), the New Mexico Acequia Association, Partnership for Earth Spirituality, and Tewa Women United. CCW brings together the vast expertise and commitment of widely respected and well-tested advocacy groups from culturally diverse backgrounds. Collectively CCW represents the only community-based coalition in Northern New Mexico that has been monitoring and advocating for better public water policy to address the toxic threats from LANL to the Pajarito Plateau and the Rio Grande. As the sacred homeland of the Pueblo Peoples it is vitally important that clean water be protected on the Pajarito Plateau. We write today to give our support to the Environmental Protection Agency's (EPA's) March 6th, 2015 Preliminary Determination that Discharges from Municipal Separate Storm Sewer Systems (MS4s) at LANL and Los Alamos County Result in Exceedances of Water Quality Standards and Require Clean Water Act Permit Coverage (Preliminary Determination).

CCW has been working as a coalition to address contaminated storm water runoff from LANL and Los Alamos County since 2006. While we have been encouraged by some progress made under the Individual Industrial Storm water Permit to address contaminated storm water runoff, we are concerned by the overwhelming data and evidence that indicates that storm water contamination from urban sources on the Pajarito Plateau is contributing to violations of water quality standards. We are encouraged that EPA is following through on its the responsibility to ensure that the waters of the Pajarito Plateau and the Rio Grande are protected by issuing this Preliminary Determination.

CCW calls on EPA to include the small urbanized area in White Rock that has been left out of the EPA's proposed coverage area in the final MS4 coverage area. This subdivision is close to the Mortandad and White Rock canyons and therefore has the potential to release storm water discharges directly into the Pajarito Plateau tributaries as well as directly into the Rio Grande. To protect water quality this area should be included in the final coverage area.

Given the nature of the pollution and the extensive monitoring infrastructure already in place at LANL, CCW calls on EPA to move forward expeditiously with issuing an Individual MS4 permit that includes rigorous monitoring and treatment requirements. Coverage under the General Small MS4 Permit will not be adequate to address the level of contaminants found in the urban storm water discharges coming off of LANL and Los Alamos County's urbanized areas. Site-specific treatment and monitoring requirements are necessary to control these contaminated storm water discharges.

In closing, the Communities for Clean Water urge EPA to move forward expeditiously with making a Final Determination that Discharges from Municipal Separate Storm Sewer Systems (MS4s) at LANL and Los Alamos County Result in Exceedances of Water Quality Standards and Require Clean Water Act Permit Coverage.

Sincerely,

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