

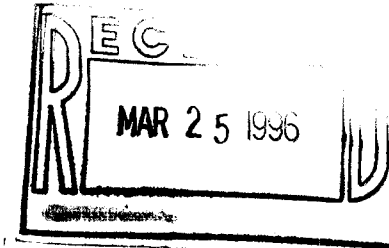


# The Rio Grande Chapter of the Sierra Club

 **ENTERED**

March 22, 1996

Cornelius Amindyas  
New Mexico Environmental Department  
2044 Galisteo Street  
Post Office Box 26110  
Santa Fe, New Mexico 87592



Re: OB/OD Operational Permit Modification, US Army Ft. Bliss in  
New Mexico

Dear Cornelius Amindyas:

As you requested at the informal public meeting held in Las Cruces on February 27, 1996, I am providing written Comments to the draft modification request to the OB/OD Operational Permit at US Army Fort Bliss, McGregor Range in New Mexico.

As we stated in previous Comments, it should be recognized that McGregor Range is not military fee land, but rather McGregor Range is land temporarily Withdrawn by Congress until the year 2001. McGregor Range is jointly managed with the Dept. of Interior, Bureau of Land Management, specifically the Caballo Resource Area of the Las Cruces District. See P.L. 99-606. McGregor Range is located in Otero County, New Mexico.

Therefore, we suggest that all future meetings regarding US Army Fort Bliss be conducted in the New Mexico County where the OB/OD site is located. This is Otero County; the County seat is Alamogordo, New Mexico. And, we suggest that the County Commission of Otero County and its planning units be fully informed of activities proposed to take place in their County.

Because Ft. Bliss is one of only two military installations in the United States that straddles a state border, we recommend strongly that the NMED coordinate with the State of Texas and EPA on any matters dealing with required environmental regulation of activities conducted by US Army Fort Bliss in New Mexico that have potential implications and impacts for both the State of Texas and the State of New Mexico.

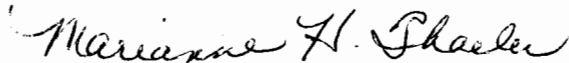
The OB/OD site on McGregor Range is close to the Texas/NM border and thus is in the same air and water sheds with the State of Texas.

Because the original Permit for the OB/OD unit is less than one year old, and this Permit modification request is to increase the permitted volumes of munitions to be disposed of at the site to 10,000 lbs. per year, we believe a decision on this modification request should await the final decision to the question, when are military munitions to be considered hazardous waste? This is particularly important since individuals representing Fort Bliss declared at the Feb. 27, 1996 meeting in Las Cruces that munitions are regularly moved across the State border. We are raising the issue of potential interstate transport of hazardous materials and issues of joint jurisdiction.

We strongly support the clean up of McGregor Range in anticipation of the return of McGregor Range lands to the BLM in Otero County, New Mexico. And, we support the use of new technologies for the disposal of military munitions.

The State of Texas and the State of New Mexico should work closely together to insure the proper levels of regulation for this uniquely located installation, US Army Fort Bliss, in the best interests of all.

Sincerely,



Marianne H. Thaeler, Military Issues Chair  
Rio Grande Chapter  
Sierra Club  
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Las Cruces, New Mexico 88011  
505-522-3421

cc: Murphy, BLM; G.B. Oliver, PLUAC