

SOUTHWEST ORGANIZING PROJECT

211 10TH STREET S.W. • ALBUQUERQUE, NEW MEXICO 87102 (505) 247-8832 • FAX 247-9972

FAXTRANSMISSION

ENVIRONMENTAL MANAGEMENT DIVISION

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A Project of Southwest Community Resources, Inc.

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August 23, 1994

Board of Directors: Eleanor Chavez Valentin García Sofía Martínez Roger McNew Rose Shaw

Staff: Jeanne Gauna Louis Head Michael Guerrero Roberto Roibal Aida Franco Diannah Nufiez Col. Thomas Norris
377 ABW/EM
Suite 5659
2000 Wyoming Blvd. SE
Kirtland Air Force Base, NM 87117-5659

Dear Col. Norris:

We are writing to you to state our position regarding the Bernalillo County/Kirtland Environmental Working Group. Recently there have been various proposals regarding the status and future direction of the Group. South West Organizing Project is one of the founding members of the EWG and at this point we feel it is important to clarify our position.

At this point we see three possibilities for the future of the EWG:

- 1) Nullify the Charter of the EWG and develop a new public participation process for environmental restoration according to the Department of Defense's new approach: Restoration Advisory Boards (RAB);
- 2) Merge the EWG with the newly developing Site Specific Advisory Board (SSAB) which is being created by the Department of Energy, the Environmental Protection Agency, the New Mexico Environment Department, Sandia National Laboratories, and various citizens and organizations;
- 3) Continue the EWG process in its current form.

It is our understanding that according to the EWG Charter, abolishing the EWG would require a consensus decision of all of the signature parties, and that the EWG is required under the Resource Conservation and Recovery Act permit of the EPA.

We will not agree to abolishing the EWG to reform under the DOD Restoration Advisory Board process. One of the strengths of the EWG has been the opportunity to discuss issues beyond the narrow field of environmental restoration. We feel that the scope of the RAB is much too limited.

After two and a half years of participating in this process, we maintain that there should be a consolidated public participation process between Kirtland Air Force Base and Albuquerque Department of Energy facilities.

The EWG process has been extremely beneficial and worthwhile. We feel, however, that it is too limited.

- * One of our main criticisms is that Department of Defense and Department of Energy concerns cannot be adequately addressed under the EWG process alone. This creates serious obstacles and inconveniences for the public to have meaningful participation and a full understanding of all of the environmental issues at local DOD/DOE facilities.
- * We also feel that financial and other resources should be made available by government agencies to members of the public to encourage their full participation in an advisory/oversight process. The resources should cover outreach and compensation for work time lost due to meetings. At this point, the EWG commits no such resources to broaden public participation.

For these reasons, we feel it is in the best interest of government agencies, and the public to explore the possibility of a merger between the EWG and the SSAB process. Although, at this point the SouthWest Organizing Project has not endorsed the SSAB process, we feel that the SSAB, if developed in an open, democratic way, can be an important vehicle for citizen participation. We encourage DOE and DOD to cooperate and assure that the public has meaningful oversight and input into environmental decision-making at Kirtland and Albuquerque DOE facilities.

Please feel free to call me if you have any questions.

Sincerely,

Michael Guerrero

SWOP

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EWG members

Congressman Steven Schiff

Dr. Wallace Ford, New Mexico Conference of Churches