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James R. Mountain
Governor



Pueblo de San Ildefonso
Department of Environmental and Cultural Preservation

SI-DECP07-373

January 26, 2007



Mr. John E. Kieling
Program Manager
Hazardous Waste Bureau - NMED
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Re: LANL MDA B Investigation Remediation Work Plan (SWMU 21-015)

Dear Mr. Kieling:

The Pueblo de San Ildefonso (the Pueblo) has reviewed the referenced document and has comments. Please note that due to time constraints we were unable to perform a complete and thorough review, but we feel we understand the salient activities, justifications and ramifications.

The Pueblo supports removal of contaminants from MDA B. This SWMU is located such that a release of contaminants could easily migrate to Pueblo land. However, the Pueblo has grave concerns with the possibility of this removed waste then being placed into MDA G. These concerns are twofold:

1. MDA G is like MDA B in that the disposal pits are unlined, which does not seem to be an improvement.
2. MDA G is even closer to Pueblo land. Essentially this option removes waste from unlined pits farther away from the Pueblo and places it in unlined pits closer to the Pueblo, and increases the risk to our people and resources.

These points also help form the basis for Environmental Justice issues with this proposed action. In basic terms, the plan calls for waste to be removed from the midst of a wealthy, dominant culture area, and allows this waste to be placed in an area that borders an economically-disadvantaged, minority landowner. The Pueblo would suffer disproportionate



effects from this proposed activity. Conversely, we realize that transporting this waste offsite could present risk to the general public, and to the people of San Ildefonso. Because of this possible risk from transportation, we feel it is necessary for the plan to present a detailed comparison of risk from transportation versus risk to the people and resources of San Ildefonso from placement in unlined pits in MDA G. Without such information to guide our decision-making, we must oppose this otherwise laudable plan.

Thank you for your attention to this important matter. If you have any questions, please feel free to contact me at 455-2273.

Sincerely,



Neil S. Weber, Director
Department of Environmental and
Cultural Preservation
Pueblo de San Ildefonso

Cc: Carol Woods, Tribal Administrator
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