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19 July 2001

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Mr. Steve Pullen
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Dear Mr. Pullen:

I am writing on behalf of the Chihuahuan Desert Conservation Alliance(CDCA) in regards to the proposed Triassic Park project east of Roswell. CDCA was formed in 1986. We address environmental issues, especially as they pertain to public lands, endangered and threatened species, and other area environmental issues. We have over 100 members in southeastern New Mexico and additional members elsewhere in New Mexico and in 8 other states.

Our organization is unalterably opposed to Triassic Park—**in any form.** We remember when this subject first came up several years ago and we don't see any difference in the current plan and the one that was rejected in 1997. Now that they have come back with a slightly altered proposal, Gandy Marley, Inc. is treating this as a different issue altogether. It is not.

CDCA is opposed to Triassic Park for a number of reasons. Some of them are outlined below.

HUMAN HEALTH AND SAFETY: Below is a discussion of the volume of toxins under consideration. If the state approves this project, the state is then saying that public health and safety issues have taken a backseat when compared with a company without a track record. Ranches in the area will be impacted by potential contamination of the land and water. Residents of New Mexico and tourists will be endangered by the huge volume of truck traffic on already poor roads. There will be spills and there will be accidents increased the contamination and impact on communities. These thousands and thousands of trucks hauling the material to the site will not be monitored like trucks hauling waste to WIPP. Be prepared for accidents, for lawsuits from people harmed and from excuses from Gandy-Marley, Inc.

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WATER: The proposal for Triassic Park, Inc. includes the outrageous item that the facility would be exempted from any ground-water monitoring. This would enable ground-water contamination to occur at serious levels LONG before it was ever detected. Additionally, the facility would require the use of 50,000 gallons of water per day. This facility will then run counter to water conservation efforts in New Mexico. If the 50,000 gallons is coming from an area that is recharging the Pecos River, it could make it more difficult for New Mexico to meet it's water obligations with Texas and could hurt farmers in southeastern New Mexico.

TOXICS: According to news accounts, Triassic Park would handle 42,000 tons of toxic each year for a period at least 25 years. This amounts to a total of **2.1 billion pounds of toxins including lead, mercury, DDT, arsenic, PCBs, strychnines and benzenes and 484 other compounds!** We don't know the accumulative impact of these toxins, how they will interact and what else might "somehow accidentally" end up there. And if the company fails and walks away from the project, then who gets the bill for cleaning it up? We all know the answer to that question.

WILDLIFE ISSUES: Triassic Park would be located adjacent to Mescalero Sands National Recreation Area where several endangered or threatened species are found including the Mescalero Sand Dunes Lizard and the Lesser Prairie Chicken. While our state spends large amounts of money attracting tourists to visit such areas, it would be counterproductive to place a facility next to a NRA.

In closing, we are additionally opposed to this proposal because of the message it would send the rest of the nation, i.e. that other states don't need to deal with their waste, they can simply truck it to the "wastelands" of New Mexico. The implication is that the people of New Mexico are either too greedy or too dumb to guard against such things as Triassic Park. We are not greedy and the people are not dumb. The people of New Mexico are opposed to this. New Mexico is already more than doing it's fair share in dealing with energy production and waste disposal for the rest of the nation.

We are totally opposed to the permit approval for the Triassic Park.

Sincerely,



Steve West, President
Chihuahuan Desert Conservation Alliance

cc: State Representative John Heaton
State Senator Don Kidd

State Representative Joe Stell
State Senator Carol Leavell