

Biswell, David, NMENV

From: Maestas, Ricardo, NMENV
Sent: Tuesday, February 20, 2018 9:36 AM
To: Allen, Pam, NMENV
Cc: Biswell, David, NMENV
Subject: FW: Support for SRIC Feb 2 comments

-----Original Message-----

From: Janet [mailto:contactus@cardnm.org]
Sent: Monday, February 05, 2018 7:41 PM
To: Kieling, John, NMENV <john.kieling@state.nm.us>; Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>; Don Hancock <sricon@earthlink.net>; Deborah Reade <reade@nets.com>
Subject: Support for SRIC Feb 2 comments

Dear Mr. Keiling,

CARD supports SRIC's position that NMED should issue a Class 3 determination for the proposed new WIPP shaft and underground drifts.

In addition to the many sound regulatory and legal references supporting SRIC's position noted in their comments, we would add the following supportive comments:

NMED settled a lawsuit with our organization in January of this year.

The settlement agreement, known as The Resolution, sets goals for citizen participation in the NMED permitting process. Limiting public participation when regulations support a full public process which includes a hearing goes against the spirit and the actual wording of The Resolution, a legal document.

An example related to The Resolution is that no study of the communities surrounding WIPP has ever been made concerning their ability to respond to a class 2 mod determination. How will the Hispanic community know about and respond to a class 2? That community would be better served by the more extensive public process of a class 3 mod.

As I, Janet Greenwald, have commented orally to NMED, CARD considers the new shaft (see SRIC's more comprehensive comments) an expansion of WIPP. There is no doubt that any expansion of WIPP is of great concern to the communities surrounding WIPP. The organization Alliance for Environmental Strategies, centered in Artesia and Eunice, New Mexico with members in Hobbes holds the expansion of WIPP as one of its major concerns.

In conclusion, designating the construction of the new WIPP shaft and underground drifts as a class two mod violates regulatory mandates and could be considered a violation of the legal agreement between CARD and NMED.

Thank you for your consideration,

Janet Greenwald, Coordinator, Citizens for

Alternatives to Radioactive Dumping

