

January 24, 2023

Ricardo Maestas, WIPP Group Staff Manager
Hazardous Waste Bureau – NMED
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

RE: WIPP RENEWAL PERMIT – REQUEST FOR 60-DAY EXTENSION OF THE COMMENT PERIOD

Dear Mr. Maestas:

The undersigned organizations request a 60-day extension until April 19, 2023 of the public comment period on the draft WIPP Renewal Permit.

We make the request because:

1. The draft Renewal Permit is 1,246 pages in length, and, as the Fact Sheet states: “The entire Permit is the subject of the draft Permit and this Renewal proceeding, and all portions are considered to be opened in this proceeding per 20.4.1.901.B.7 NMAC (incorporating 40 CFR § 270.41).” at 5. The length and complexity of the draft Permit and the many hundreds of changes proposed by the Permittees and NMED require a significant amount of time and effort for the public to adequately understand and address.
2. The 60-day public comment period is the same amount of time given to the Permittees to respond to some of the matters identified in the Technical Incompleteness Determination (TID), issued by NMED on May 13, 2022. The Permittees have many more resources to respond to the TID than individuals and organizations have to respond to the much more voluminous and complex draft Renewal Permit. Thus, the public should have a comment period of significantly more than 60 days.
3. The New Mexico Legislature is in session from January 17 to March 18 and many organizations and individuals will be involved with various bills and other matters during the session. Thus, the comment period should extend until sometime after the session ends.

Thank you for your consideration and favorable response to this request.

Sincerely,

Douglas Meiklejohn
Conservation Voters of New Mexico

Joni Arends/Deborah Reade
Concerned Citizens for Nuclear Safety

Scott Kovac
Nuclear Watch New Mexico

Don Hancock
Southwest Research and Information Center

Deborah Reade/Janet Greenwald
Citizens for Alternatives to Radioactive Dumping

John Wilkes
Veterans for Peace, Chapter 63

Cynthia Weehler
The 285 ALLIANCE

Marian Naranjo, Founder
Honor Our Pueblo Existence
Santa Clara Pueblo, NM

Gregory Corning, President
Veterans For Peace Chapter 55 (Joan Duffy Chapter)
Santa Fe, New Mexico

Beata Tsosie, Organizational Director
Breath of My Heart Birthplace
Española, NM

Marlene Perrotte and Joan Brown
Partnership for Earth Spirituality
Albuquerque, NM

Cc: Secretary James Kenney