

Tiffany Rivera

Please find attached New Mexico Farm and Livestock Bureau's comments in opposition to the ONRW.



NEW MEXICO FARM & LIVESTOCK BUREAU

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June 10, 2022

Water Quality Control Commission
1190 Saint Francis Drive
Suite # South 2102
Santa Fe, New Mexico 87505

ATTN: Ms. Pamela Jones, NMWQCC Administrator

Dear Commissioners,

Thank you for the opportunity to comment on the Outdoor Recreation Division's petition to designate segments of the Rio Grande, Rio Hondo, Lake Fork, East Fork Jemez River, San Antonio Creek, and Redondo Creek as Outstanding National Resource Waters (ONRWs).

New Mexico Farm and Livestock Bureau [NMF&LB] is the largest agriculture organization in the state, representing more than 20,000 member families involved in all aspects of agriculture including dairy, livestock, fruits, and vegetables. NMF&LB is a grassroots advocacy organization which represents our members' interests at a local, state, and national level.

NMF&LB respectfully opposes the proposal submitted by the petitioners to designate segments of the Rio Grande, Rio Hondo, Lake Fork, East Fork Jemez River, San Antonio Creek, and Redondo Creek as ONRWs. NMF&LB adamantly opposes ONRW designations, these designations have the potential to severely limit economic growth while also placing additional restrictions and regulations on water and land use. In a state as arid and dry as New Mexico, continued access and use of water on our working lands is imperative. We actively support and encourage voluntary and incentive-based conservation and management practices and these efforts should be conducted through a grassroots effort and supported by citizens of the state.

Water Data

Data presented in the petition, which was collected by the New Mexico Environment Department's Surface Water Quality Bureau (SWQB), described that the water quality was equal to or better than the numeric water quality criteria outlined in the New Mexico Administrative Code for each respective segment. This data indicates that the current management practices in place are providing sufficient protection to the water segments identified and are supporting a higher quality standard than those established in the administrative code. For this reason, we do not support any additional regulations to control water quality.

Activities that Might Reduce Water Quality

The petition highlights climate change, increased recreation without proper management, and wildfires as a few of the activities that may reduce water quality. This year New Mexico has already faced its fair share of wildfire and its impacts on our local communities. Wildfires across the state have severely damaged the landscape and compromised our water resources. New Mexico, along with the Federal Government, must rethink its approach to forest and watershed management, proactive and preventative management measures must be taken to better protect our resources. The designation of an ONRW cannot shield our natural lands from extreme wildfires, flooding, and the impairment of water resources that follow. Active management practices like forest thinning, grazing of hazardous fuels, and herbaceous weed control not only contribute to overall forest health, but also work to provide more beneficial and thriving habitat for wildlife.

Additionally, we oppose this petition as it aligns with the Governor's Executive Order (2021-052) which looks to protect 30% of the state's land and waters by 2030. Our state's farmers and ranchers are some of the best and most experienced stewards of our natural resources as their very livelihoods depend on land and water. In New Mexico, our state's farmers and ranchers have voluntarily enrolled over 10.5 million acres in the Conservation Reserve Program, Conservation Stewardship Program, and the Environmental Quality Incentives Program. Our state's farmers and ranchers continue to do their part by reducing their carbon footprints, participating in voluntary conservation programs, and working to restore and improve our state's natural resources. We encourage more voluntary and incentive-based approaches to assist in caring for our environment and natural resources instead of additional mandates, restrictions, and designations.

Lastly, we oppose the submitted proposal as we do not believe that the designation will mediate the root cause of the problem which it is trying to solve. Water quality, especially on our natural lands should be approached from a holistic perspective and not one that seeks to address only one specific component of the problem. The State and Federal Government must place more emphasis and designate additional resources to collectively improve the entire forest ecosystem. These improvements will result in healthier forests, better wildlife habitat, and higher water quality, all of which will lead to increased recreation and economic opportunities.

Thank you for the opportunity to provide comment on the proposed ONRW designation. We encourage the commissioners to reject the petition and instead encourage a more comprehensive approach to watershed conservation and resource management.

Best,

A handwritten signature in black ink, appearing to be 'Tiffany Rivera', written in a cursive style.

Tiffany Rivera
Director of Government Relations