

Mayor Stacie Mitchell-Gweah

I submit these comments in my individual capacity as the Mayor of Stamps, Arkansas, a small rural community that has experienced the long-term consequences of industrial groundwater contamination. I understand firsthand what can happen when industrial contamination affects a community's water and environment.

Stamps was home to the former Red River Aluminum facility, which began operating in 1987. Our community spent years dealing with the consequences of industrial waste and groundwater contamination associated with that property. Federal and state investigations documented contamination, extensive remediation was required, and restrictions were ultimately placed on groundwater use at the site.

That history shapes my concern regarding PFAS regulation today.

Communities should not have to discover years or decades later that chemicals released into their environment posed risks that could have been prevented through stronger safeguards, earlier testing, better disclosure, and more cautious regulatory decisions.

I am particularly concerned about any PFAS law or regulation that delays meaningful protections, creates broad exemptions for classes of PFAS-containing products, or allows exemptions to remain when the scientific evidence supporting them is incomplete.

When scientific uncertainty exists, that uncertainty should not automatically benefit the polluter or manufacturer. It should result in greater precaution and protection for the public.

For rural and economically challenged communities, the stakes are especially high. Small municipalities often do not have the financial resources to independently conduct extensive environmental testing, install sophisticated treatment systems, pursue responsible parties, or absorb millions of dollars in remediation expenses.

The cost of contamination can therefore fall upon the very residents who had no role in creating it.

I respectfully urge the New Mexico Environment Department to:

1. Closely reconsider PFAS exemptions, including the fluoropolymer exemption, and require strong independent scientific evidence before determining that any category warrants exclusion.
2. Avoid unnecessary delays in restrictions on PFAS when safer alternatives and reasonable regulatory measures are available.
3. Require comprehensive baseline environmental testing before potentially contaminating industrial activities begin, particularly testing of groundwater, surface water, soil, and drinking-water sources.
4. Establish ongoing monitoring requirements so contamination can be identified before it spreads throughout a community or watershed.

5. Require transparency regarding PFAS chemicals used, manufactured, stored, discharged, or disposed of by industrial facilities.
6. Ensure that communities potentially exposed to PFAS have meaningful access to appropriate environmental testing, health information, and, where scientifically warranted, biomonitoring and medical monitoring.
7. Apply particular consideration to rural, low-income, and historically burdened communities that may lack the resources necessary to respond to environmental contamination on their own.

The lesson from communities such as Stamps, Arkansas, is that environmental contamination is not simply an environmental issue. It becomes a public-health issue, an infrastructure issue, an economic-development issue, and a generational community issue.

Once groundwater is contaminated, government cannot simply turn back the clock.

The public should not have to prove harm after years of exposure before reasonable safeguards are implemented. Government has an obligation to prevent foreseeable harm whenever reasonably possible.

Our experience in Stamps reminds me that prevention is far less costly—financially and humanly—than remediation after contamination has occurred.

I therefore encourage New Mexico to adopt the strongest scientifically defensible protections against PFAS, carefully scrutinize exemptions, require meaningful environmental monitoring, and place protection of human health and drinking water ahead of regulatory convenience.

A law called a "Protection Act" should provide actual protection.

Respectfully submitted,

Stacie Mitchell-Gweah

Mayor
City of Stamps, Arkansas