



June 22, 2026

Submitted through NMED Public Comment Portal

Megan McLean, WIPP Program Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Re: Public Comment in Support of New Mexico Environment Department Agency-Initiated
Draft Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant

Dear Ms. McLean:

Communities for Clean Water (CCW) submits these public comments in support of the New Mexico Environment Department (NMED) Agency-Initiated Draft Hazardous Waste Permit (HWFP) for the Waste Isolation Pilot Plant (WIPP).

Communities for Clean Water (CCW) is a coalition of organizations whose mission is to ensure that community waters impacted by Los Alamos National Laboratory (LANL) are kept safe for drinking, agriculture, sacred ceremonies, and a sustainable future. Our coalition includes Amigos Bravos, Breath of My Heart Birthplace, Concerned Citizens for Nuclear Safety, Honor Our Pueblo Existence, New Mexico Acequia Association, Partnership for Earth Spirituality, Tewa Women United, Elder Kathy Sanchez, and ecological artist Kaitlin Bryson. CCW brings together the vast expertise and commitment of widely respected advocacy groups from culturally diverse backgrounds.

We offer the following blessing to ground our public comments:

Everyone here walks, lives, and breathes within these sacred lands of Tewa, Tiwa and Towa Peoples. As we begin our activities, let us fully acknowledge where we are and give thanks for living mountains, valleys and waters, which sustain our lives and form Tewa, Tiwa and Towa ancestral homelands and those of Land-Based Peoples. Let us ground our activities in awareness of where we are and may the mannerism of Tewa, Tiwa and Towa Peoples enter our lives and fill us with gratitude, love, care, and respect for all that is shared between us and all beings.

For decades, the Department of Energy (DOE) promised New Mexicans that if WIPP would be allowed to operate in New Mexico, it would clean up the plutonium-contaminated transuranic (TRU) waste at Los Alamos National Laboratory (LANL) and Sandia National Laboratories. Many New Mexicans believed DOE. As you know, WIPP received its first shipment of LANL TRU waste on March 26, 1999. DOE claimed that all the TRU waste at LANL would be cleaned up in 25 years, or by March 26, 2024. That did not happen. DOE/LANL failed to keep their



promises. New Mexicans wait for DOE/LANL to fulfill their promises to clean up their mess and to protect air, water, soils, human health and the environment. But for how long?

While 22 DOE sites across the country that stored/disposed of legacy TRU waste have been cleaned up since the end of the Cold War, LANL has not. LANL TRU waste is stored in metal drums, plywood boxes, cardboard boxes and plastic bags, and disposed of in unlined pits, trenches and shafts dug into volcanic tuff. Further, filled waste drums sit above ground in fabric tents at Area G in a wildfire zone. Drought and high winds plague the landscape.

Our frustration furthers as DOE/LANL wastes migrate through the landscape into the Española Basin Sole Source Drinking Water Aquifer, into the deep aquifer below Pueblo de San Ildefonso and into the Rio Grande. To the east of LANL and across the Rio Grande, radionuclides have been detected in the drinking water wells at the Buckman Wellfield. When will DOE/LANL take responsibility for their mess to ensure LANL is the next DOE site to be cleaned up? The proposed NMED Agency-Initiated Modification (AIM) is a new tool that could be used to accomplish comprehensive cleanup at LANL.

CCW is grateful for NMED's leadership to release the AIM to the WIPP Hazardous Waste Facility Permit (HWFP) for public comment and review. We recognize the opportunity it provides to get waste "off the hill" in a deadline driven manner.

DOE argues WIPP does not have the authority to dictate LANL's operations and schedules to get waste off the hill. It is a hollow argument. DOE has demonstrated time and time again that it does have that authority. Witness the number of shipments of newly-generated waste from operations at the Plutonium-Facility (PF-4) to WIPP that take priority over legacy waste shipments.

Thank you for the opportunity to submit these comments in support of the NMED Agency-Initiated Modification to the WIPP Hazardous Waste Facility Permit. Please contact me with any questions or comments.

Sincerely,

Kalyn Mae Finnell *6/22/2026*

Kalyn Mae Finnell, Coordinator
Communities for Clean Water