

# Gabriel Carrion-Gonzales

Dear New Mexico Environment Department,

My name is Gabriel Carrion-Gonzales, and I am a resident of Albuquerque, New Mexico. I support the primary proposed changes outlined in the Draft Permit, including:

- From January 1, 2027 through December 31, 2031, at least 55% of the total volume of all waste emplaced at WIPP from all generator/storage sites must be LANL legacy waste.
- Beginning January 1, 2032, and until all LANL legacy waste has been emplaced at WIPP, LANL legacy waste must comprise at least 75% of the total volume of waste emplaced from all generator/storage sites.
- Legacy waste currently stored above ground at LANL Material Disposal Area-G should be shipped and emplaced at WIPP by July 1, 2028.
- If any of these conditions are not met, shipments from all other generator/storage sites (except LANL) should cease until compliance is restored.
- Annual reports should continue to document compliance and demonstrate that LANL legacy waste remains the priority for disposal.

I believe it is both achievable and necessary to remove the above-ground legacy waste by July 1, 2028.

However, I am concerned that the Annual Inspection and Monitoring (AIM) requirements do not establish a clear deadline for identifying and addressing the buried legacy waste at LANL. While the AIM sets annual percentage requirements for shipping legacy waste to WIPP, it does not require completion of a comprehensive inventory of the remaining below-ground waste. I encourage the Department to establish a firm deadline—such as January 1, 2029—to complete this inventory so that meaningful planning, accountability, and cleanup can move forward.

WIPP was never intended to function as a perpetual jobs program. It has already remained in operation well beyond its originally anticipated completion date. Delays have largely resulted from insufficient federal funding and planning by the U.S. Department of Energy. The federal government should be investing in long-term waste management solutions while fulfilling its cleanup obligations here in New Mexico.

At the same time, the federal government's rapidly expanding plutonium pit production program represents one of its most expensive nuclear weapons investments, with billions of taxpayer dollars committed annually over the coming decades. These resources should also be weighed against pressing national priorities, including environmental cleanup, climate resilience, public health preparedness, and the protection of communities that have borne the impacts of nuclear activities for generations.

The proposed AIM revisions appropriately strengthen state oversight because the Department of Energy has not consistently fulfilled its prior commitments to the people of New Mexico. I appreciate the New Mexico Environment Department's efforts to ensure that cleanup of legacy waste remains the highest priority.

Thank you for your consideration.

Sincerely,

Gabriel Carrión-González

Albuquerque, New Mexico