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New Mexico's water-quality standards should reflect the science, the full risk of emerging contaminants, and the lived experience of the communities those standards are supposed to protect.

PFAS protections are important but incomplete. The Commission should adopt the additional human-health, mixture, and aquatic-life protections to the fullest extent supported by the record and permitted by law. If the Commission decides that any provision requires separate notice or another rulemaking, it should order NMED to begin that process on a publicly funded and enforceable timetable.

Regulation of per- and polyfluoroalkyl substances, i.e. PFAS or "forever chemicals" is a key issue. NMED proposes aquatic-life criteria for PFOA and PFOS. These protections should be adopted without weakening. They recognize that these persistent chemicals can accumulate in water and aquatic organisms and can impair survival, growth, and reproduction.

But aquatic-life criteria do not provide a complete system for protecting people from PFAS exposure. They are not drinking-water standards. They do not, by themselves, adequately address people who consume contaminated fish, the combined effects of multiple PFAS, private-well contamination, contamination moving between groundwater and surface water, or the thousands of PFAS compounds that remain outside the proposed rule.

Human-health criteria for exposure through consuming aquatic organisms, benchmarks for eight additional PFAS, and a hazard-index method for evaluating the combined risk from PFAS mixtures are proposed by Amigos Bravos, supported by the testimony of toxicologist Dr. Jamie DeWitt.

These additions matter because communities are not exposed to one chemical at a time. PFAS move through water, sediment, soil, wastewater, biosolids, fish, wildlife, and human bodies. A regulatory program that evaluates only PFOA and PFOS separately can miss the cumulative risk created when several PFAS are present together.