



Friends of the Wild Rivers

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EPA Region 6, Water Quality Protection Division (6WQ-CA)

Attn: Diane Smith

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RE: MS4 Designation Review / Docket No. 6WQ-03-SW01

To Whom It May Concern:

As a statewide river conservation organization based in New Mexico, Amigos Bravos, Friends of the Wild Rivers, would like to submit the following comments on the small MS4 designation review. In New Mexico, issues of water quality and quantity are integral to all aspects of life. The cultural and ecological survival of the communities of New Mexico is intricately tied to our rivers, acequias and other water bodies and we strongly support efforts to curb pollution to our waters through strong storm water controls. We work to protect and conserve wild rivers in New Mexico and have a number of concerns about the MS4 designation or lack thereof.

We were disturbed to see that none of the outside urbanized areas populations that presently meet the over 10,000 population and 1,000 per square mile density criteria have been listed as receiving a definite MS4 designation. Because water is such a precious resource in the arid west we need to protect every last drop that falls from the sky and flows through our rivers. Therefore all of the cities/areas listed in the Tentative Designation Decision Chart- Alamogordo, Artesia, Clovis, Deming, Gallop, Hobbs, Las Vegas, Los Alamos, Portales, Roswell, and Silver City- should be designated as MS4s and should be required to obtain coverage under the general storm water permit.

There are two areas in which we have been recently doing work on water quality issues and are particularly concerned about – Las Vegas and Los Alamos. The Gallinas river, which flows through the middle of Las Vegas, is on the 303(d) list and is impaired for unknown toxicity, streambed deposits, and ammonia. The state of New Mexico is presently in the beginning process of drafting a TMDL for the Gallinas. Downstream from Las Vegas on the Gallinas river there are numerous farmers who depend upon the water from the river to irrigate their fields using traditional acequia irrigating systems.

The Gallinas eventually flows into the Pecos river which is one of the largest and most economically important river systems in New Mexico. Because the river flows directly through the middle of town and because Los Vegas well exceeds the population criteria and almost doubles the population density criteria Amigos Bravos feels that it is essential that Las Vegas be designated a MS4 and is required to obtain coverage under the general MS4 storm water permit.

Storm water from the city of Los Alamos eventually flows into the Rio Grande, a river system that Amigos Bravos has worked for over 15 years to protect and restore. It is essential to protect the Rio Grande from storm water from communities as large as Los Alamos. As the table of tentative designation decisions indicates, Los Alamos experiences a higher daytime population due to commuters working at Los Alamos National Laboratories. A large daily influx of commuters into the area means more traffic and larger potential pollution problems from petroleum products on roadways than would be expected from the 2000 census data population figure of 11,909 which represents the population of people who reside in the Los Alamos.

New Mexico is presently undergoing the triennial review process of our water quality standards. As part of that process the New Mexico Environment Department is planning on creating segment designations for water bodies in the Los Alamos area. Uses of secondary contact, wildlife habitat, livestock watering, coldwater aquatic life, limited aquatic life, secondary and primary contact will be applied to these waters. To protect these uses it is crucial to control storm water pollution from the community of Los Alamos.

In conclusion, Amigos Bravos strongly urges the EPA to designate all 11 populations listed above as MS4s with a special emphasis on designating Las Vegas and Los Alamos.

Sincerely,

Rachel Conn
Clean Water Circuit Rider
Amigos Bravos