



CERTIFICATION PROPOSAL

CAMINO REAL REGIONAL UTILITY AUTHORITY WASTEWATER TREATMENT PROJECT SUNLAND PARK, NEW MEXICO

Submitted: March 12, 2015

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INDEX

EX	ECUTIVE SUMMARY	2
1.	FLIGIBILITY	

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EXECUTIVE SUMMARY

CAMINO REAL REGIONAL UTILITY AUTHORITY WASTEWATER TREATMENT PROJECT SUNLAND PARK, NEW MEXICO

Project: The proposed project consists of the construction of a new

wastewater treatment plant (WWTP) to replace the existing north WWTP, owned and operated by the Camino Real Regional Utility Authority (CRRUA), which serves the City of Sunland Park and unincorporated areas of southern Doña Ana County (the "Project").

Project Objective: The purpose of the Project is to provide improved access to

sustainable wastewater treatment services by replacing the existing overloaded and failed North WWTP, reducing the risks of untreated or inadequately treated wastewater discharges, and improving the

quality of effluent discharges to receiving water bodies.

Expected Project Outcome:

The Project is expected to generate environmental and human health benefits related to the following Project outcomes:

- Eliminate the risk of untreated or inadequately treated wastewater discharges, benefitting 1,981 residential connections served by the north plant.¹
- Increased wastewater treatment capacity, adding 1.0 mgd to CRRUA's treatment capacity for a total of 3.3 mgd.
- Improved wastewater effluent quality to comply with current permit requirements. The existing facility is under the Environmental Protection Agency (EPA) enforcement action for untreated discharges to "Waters of the US."

Population Benefited 6,438 residents of Santa Teresa and the City of Sunland Park in

southern Doña Ana County.2

Project Sponsor: Camino Real Regional Utility Authority (CRRUA).

Project Cost: US\$11,700,000.

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¹ Information provided by CRRUA in email dated 9/22/2014. CRRUA has a total of 5,068 connections served by both the North and South Plants.

² Source: http://factfinder2.census.gov/faces/nav/jsf/pages/community_facts.xhtml#none
Estimated from number of residential connections and an average number of 3.25 residents per housing unit: 2.88 in Santa Theresa and 3.63 in Sunland Park.

BEIF Grant: U\$\$8,000,000.

Uses & Sources of Funds:

(U.S. Dollars)

Uses	Amount	%
Construction, contingencies, and supervision	\$11,700,000	100
Sources	Amount	%
NADB BEIF Grant	\$8,000,000	68
State of New Mexico Grant	\$3,700,000	32
TOTAL	\$11,700,000	100

CERTIFICATION PROPOSAL

CAMINO REAL REGIONAL UTILITY AUTHORITY WASTEWATER TREATMENT PROJECT SUNLAND PARK, NEW MEXICO

1. ELIGIBILITY

Project Type

The Project falls within the eligible sector of wastewater treatment.

Project Location

The Project will be located in the community of Santa Teresa, Doña Ana County, New Mexico, approximately 5 miles (8 kilometers) from the U.S.-Mexico border. The project is in the border region defined as within 62.5 miles (100 km) of the U.S.-Mexico International Border.

Project Sponsor and Local Authority

The public-sector project sponsor, the Camino Real Regional Utility Authority (CRRUA), is a legal and separate governmental entity created jointly by Doña Ana County and the City of Sunland Park pursuant to the provisions of the New Mexico Joint Powers Act (11-1-1 et seq. NMSA 1978). CRRUA is authorized to own, operate and maintain public water and wastewater systems and to provide public water and wastewater utility service, and is responsible for developing infrastructure improvement projects.

2. CERTIFICATION CRITERIA

2.1. TECHNICAL CRITERIA

2.1.1. Project Description

Geographic Location

The new WWTP will be constructed immediately to the south of the existing North WWTP. The site is approximately 5 miles from the U.S.-Mexico border. The new plant will be located at approximately 31o 51'14"N and 106o 37'50"W.

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Carbon Sente Targe North WWIP Replacement

Sonora

To Sonora

Figure 1
PROJECT VICINITY MAP

General Community Profile

According to the 2010 US Census Data, the Census Designated Place (CDP) for Santa Teresa had an estimated population of 4,258 and the City of Sunland Park's estimated population was 14,106.³ The plant will provide services to 2,162 total connections (1,981 residential connections) in the unincorporated community of Santa Teresa and in the northern portion of Sunland Park. A little more than 40% of the CRRUA's total connections will be served by the new facility.

The estimated Median Household Income (MHI) for the community of Santa Teresa is \$42,649 with 21.5% of its residents living below the poverty level; the MHI for the City of Sunland Park is \$25,990 and 42.7% of its population lives below the poverty level. For comparison, the MHI for the state of New Mexico is 44,886 and 19.5% of the state's population lives below the poverty level.

The status of public services in the CRRUA service area is described in Table 1 below.

³ Source: http://factfinder2.censu<u>s.gov/faces/nav/isf/pages/community_facts.xhtml#none</u>

overloading of the North WWTP led to its inability to meet its permit requirements and the discharge of untreated or inadequately treated discharges.

Modifications to the North WWTP discharge were implemented to prevent continuous untreated discharges. Currently, the North WWTP is used to provide pretreatment before pumping the effluent stream to the CRRUA's South WWTP. Although this solution has avoided further exposure to inadequately treated flows, there is a significant risk of these conditions recurring, because the South Plant is operating at its design capacity. The North WWTP is required to provide the utility with adequate wastewater treatment capacity. This situation supported the selection of the Project for funding from the EPA's U.S.-Mexico Border Water Infrastructure Program.

It is important to note, that in addition to the proposed capital improvement project, to address issues with high organic loading and prevent similar consequences for any new infrastructure, CRRUA has adopted a pretreatment ordinance requiring industrial users to pretreat their effluent before discharging to the CRRUA wastewater collection system. The pretreatment ordinance requires that wastewater from industrial users comply with characteristics similar to normal residential discharges.

Project Scope

The design for the new WWTP is based on recommendations developed in *Technical Memorandum for Sunland Park North Wastewater Treatment Plant Replacement, December 2012.* The Technical Memorandum (TM) recommended replacing the existing plant with a 1.0 MGD package plant using an extended aeration technology. Per the final design, the new plant will consist of the following components:

- <u>View Pointe Lift Station rehabilitation</u>: Existing pumps and pipes, will be replaced as needed, and a new electromagnetic flow meter will be installed;
- *Head works*: Influent meters, mechanical bar screens, and grit chamber;
- <u>Treatment basins</u>: An extended aeration package facility consisting a selector tank for settling of solids, first and second stage aeration tanks, and a clarifier;
- <u>Effluent flow meter</u>: Parshall flume with an ultrasonic flow meter will be placed downstream of the ultraviolet (UV) system to meter effluent discharges;
- <u>Effluent pumps</u>: New effluent pumps will be connected to existing an existing force main to discharge effluent to the Rio Grande;
- <u>Sludge digesters</u>: Two tanks integrated into the package plant, with coarse bubble aeration system, submersible sludge pumps, and telescoping valves;
- <u>Belt filter press</u>: For sludge thickening to be housed in a metal building;
- <u>Blower building</u>: Housing for plant's three blowers for the fine bubble aeration system and 3 blowers for the coarse bubble aeration system the plant's electrical room will also be housed in the blower building;
- <u>Wash water system</u>: Pumps and plumbing to use plant effluent to wash components such as washer compacter, grit chamber, bar screens, belt filter press, etc.;

- <u>Biofilter</u>: Odor control system, the system will consist of piping, ventilation and odor control elements;
- <u>Generator</u>: Backup generator will be provided to support plant operations, especially in the event of a power outage; and
- <u>Administration building</u>: Office space, maintenance areas, and restrooms for operations staff.

Figure 2 outlines the service area to be served by the proposed WWTP. Figure 3, below, provides a general schematic of the treatment process proposed for the Project.

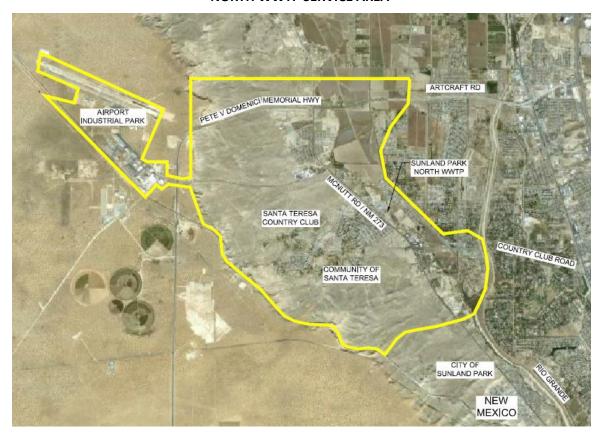


Figure 2
NORTH WWTP SERVICE AREA

Second Stage
Sequencing Aeration - Denitrification

Aerobic Digester

First Stage
Aeration Nitrification

Surge Tank

First Stage
Aeration Nitrification

Second Stage
Sequencing Aeration - Denitrification

Aerobic Digester

Figure 3
TYPICAL PROCESS SCHEMATIC

Source: http://www.aeromod.net/sequox.cfm

Table 2 shows the proposed schedule for project implementation milestones.

Table 2
PROJECT MILESTONES

Key Milestones Status	
Procurement	Anticipated: 2 nd quarter 2015
Installation period	Complete within 14 months from notice to proceed.

2.1.2. Technical Feasibility

Design Criteria

The new WWTP has been designed to meet anticipated National Pollutant Discharge Elimination System (NPDES) discharge permit requirements. The Preliminary Engineering Report (PER), and TM provide analysis of the plant's hydraulic loading and anticipated influent characteristics. The New Mexico Environment Department (NMED) and EPA will not issue an NPDES discharge permit until the plant is under construction, but they have provided guidance for anticipating the final discharge requirements. The anticipated influent and effluent characteristics for the plant's design are listed in Table 3.

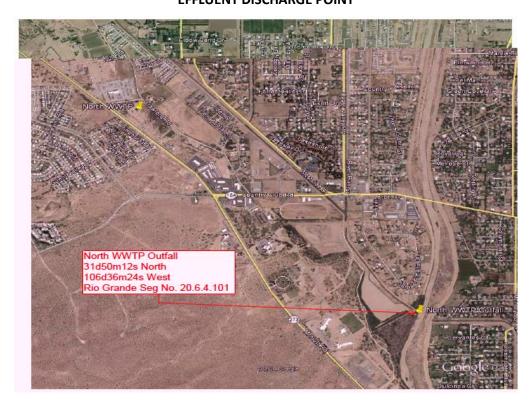
Table 3
ANTICIPATED INFLUENT CHARACTERISTICS AND DISCHARGE REQUIREMENTS

Parameter	Influent	Design Effluent	Anticipated Effluent Permit Requirements
Average Flow (MGD)	1.0	1.0	
BOD (mg/L)	250	≤10	≤30
TSS (mg/L)	250	≤20	≤30
TKN (mg/L)	40	-	
NH ₃ -N (mg/L)		≤1.5	≤1.5
Total N (mg/L)		≤10	
E. Coli CFU/100 mL		≤126	≤126

The plant's design is based on the organic and hydraulic loading from anticipated influent and the target effluent quality to insure that permit requirements will be met. The plant's design is based on the TM's recommendation for a 1 MGD facility with the organic loading listed in Table 3. Considerations for future expansion have been incorporated into the design, which will allow for the plant to meet new demands driven by developers with phased expansion.

The plant's effluent will be discharged approximately two miles south of the North WWTP site. The location of the discharge point is 31°50′12″ North, and 106°36′24″ West, to Rio Grande Segment No. 20.6.4.101. The point of discharge is shown in Figure 4.

Figure 4
EFFLUENT DISCHARGE POINT



Selected Technology

The following considerations were taken into account for the process selection criteria:

- <u>Wastewater Treatment</u>: The plant must meet anticipated regulatory requirements as outlined in Table 3 above. The wastewater treatment plant must meet the NPDES permit requirements which will be set during the construction process.
- <u>Treatment Capacity</u>: The replacement plant will treat the current average wastewater stream of 0.70 MGD, have the capacity to treat additional demand resulting from natural growth over the life of the plant, and be expandable to meet future demands resulting from development led growth. The design capacity of the North WWTP is 1.0 MGD, which will allow the plant to treat current wastewater flows and allow for anticipated natural growth.
- <u>Capital Cost</u>: The utility's capacity to fund the construction of the Project is extremely limited therefore the selection of a low cost option was targeted. The TM was performed specifically to identify a low cost alternative to the recommendations provided by the PER.
- Operations and Maintenance (O&M) Costs: O&M costs have an ongoing impact on the
 utilities financial viability therefore O&M considerations were included in the evaluation
 process.

The proposed WWTP will have a capacity of 1.0 MGD, to treat an average wastewater flow of approximately 0.7 MGD. The excess capacity will allow the plant to serve the existing demand, as well as providing for estimated natural growth throughout the life of the plant. It is anticipated that future demand on the new WWTP will be driven by planned developments. Allowances for phasing have been taken into consideration to allow the plant to be expanded in order to meet future demands. Future phases will be supported by user fees.

2.1.3. Land Acquisition and Right-of-Way Requirements

The WWTP will be constructed on vacant land already owned by CRRUA, adjacent to the existing North WWTP. Since the plant will be constructed immediately to the south of the existing facility only new yard piping will be needed to make connections between the CRRUA's existing wastewater collection infrastructure and the new treatment facility. This project will not require the purchase of any additional land or right-of-way easements.

The site has adequate space for an additional set of treatment basins which will be constructed when increased demand warrants the plant's expansion. The design of the new facility has included considerations such as yard piping, stub outs, and earthwork to account for the future basins.

2.1.4. Management and Operations

The operations and management of the proposed Project will be the responsibility of CRRUA. The utility will ensure that sufficient resources, training, and staff are available for the proper operation and maintenance of the new WWTP.

CRRUA provides both water and wastewater services, and has established procedures for operations and maintenance (O&M) of both services. CRRUA has 13 licensed operators, at levels of I, II, III, and IV; all operators are cross-trained in water and wastewater operations. The design consultant and plant vendor will provide the operators with O&M manuals and training for the correct operation of the new WWTP. NMED requires wastewater operators with a level IV certification to operate and maintain the system; therefore, the existing staff complies with this requirement. The utility maintains an ongoing training program to ensure that it has qualified personnel to operate and maintain its water and wastewater infrastructure.

The CRRUA took over day-to-day operations of the utility in February 2012. Prior to CRRUA's involvement, the facilities were owned and managed by the City of Sunland Park. Many of the management responsibilities for CRRUA are handled by Doña Ana County Utilities. For example, the county provides, payroll, accounting and procurement services for the CRRUA, but the CRRUA's technical operations are independent of the county.

2.2. ENVIRONMENTAL CRITERIA

2.2.1. Compliance with Applicable Environmental Laws and Regulations

Applicable Laws and Regulations

The Project is subject to the environmental clearance process included in the National Environmental Policy Act (NEPA). In considering funding from the US-Mexico Border Water Infrastructure Program, the Project was reviewed in accordance with the U.S. National Environmental Policy Act (NEPA), 42 USC §§4321-4370f. In accordance with NEPA, Council on Environmental Quality (CEQ) regulations found at Title 40 CFR §§1500.1-1508.28, and EPA NEPA regulations at 40 C.F.R. Part 6, EPA Region 6 completed the environmental review and clearance process.

A National Pollutant Discharge Elimination System (NPDES) permit will be required before the proposed plant begins operations. The statutory basis for the NPDES program was established under the Clean Water Act in 1972. The permit will set the water quality requirements for discharges from the new North WWTP before it begins operations. The NPDES permit is not issued until the plant is under construction, therefore the final permit limits are still not known. However, the design targets, as reported in Table 3 above, will produce high quality effluent, which are expected to exceed the water quality typically required under the NPDES program.

Environmental Studies and Compliance Actions

Since December 2003, the North WWTP has been under an Administrative Order from the EPA (CWA-06-2004-185) requiring corrective actions, for failing to meet the requirements of its NPDES permit. Since failing, the North WWTP has been used to provide pretreatment to the

waste stream, then the wastewater is conveyed to the South WWTP. The North Plant's NPDES permit has expired; therefore, it cannot directly discharge effluent. Currently, all of its waste stream must go to the South Plant. A new NPDES permit will be obtained during the construction of the new facility.

An update to a previous Environmental Information Document (EID) was developed for this Project by Epsilon Systems in support of the NEPA process. A previous Finding of No Significant Impact (FONSI) was issued in July 2009, which expired in July 2014, requiring an update. The update has been completed. The EID evaluates the potential environmental impacts that would result from the implementation of alternatives considered, including the proposed action. To obtain a FONSI the proposed Project is evaluated for potential environmental consequences and methods for mitigating the effects are made. If the project's environmental impacts are determined to be immaterial then a FONSI is issued. The EID addresses each of to the following environmental areas:

- Air quality, odors, and greenhouse gas emissions
- Noise impacts
- Water quality, hydrology and floodplain impacts
- Biological resources and wetland impacts
- Cultural and historic resource impacts
- Geology and soils impacts
- Municipal and public service impacts
- Public health, hazards and waste management
- Socioeconomic conditions
- Land use and planning
- Transportation and circulation
- Utilities and service systems, and
- Environmental justice

Based on the findings and conclusions of the EID, EPA Region 6 prepared an Environmental Assessment (EA) and the FONSI, which was issued on October 9, 2014.

Pending Environmental Tasks and Clearances

There are no pending environmental tasks or authorizations.

Compliance Document

- EPA Finding of No Significant Impact (FONSI) issued July 21, 2009 (expired).
- EPA Finding of No Significant Impact (FONSI) issued October 09, 2014.

2.2.2. Environmental Effects / Impacts

CRRUA currently relies solely on the South WWTP to treat wastewater from the communities of Sunland Park and Santa Teresa. The South WWTP has the capacity to treat 2.0 MGD; the additional loading from the North Plant causes the South Plant to operate near capacity. The high loading at the South Plant increases the risks of its failure, especially because the high loading prevents CRRUA from performing normal cleaning and maintenance activities.

Prior the EPA's administrative order preventing the continued discharge from the north plant, the effluent from the plant was identified as the point source of elevated levels of pollutants associated with wastewater treatment facilities, such as total suspended solids (TSS), biological oxygen demand (BOD_5), and Fecal Coliforms.

Anticipated benefits include:

- Elimination of the risk of discharges of untreated or inadequately treated wastewater from the 2,162 residential, industrial, and commercial connections served by the North Plant.⁵
- Increased wastewater treatment capacity an additional 1.0 MGD to CRRUA's treatment capacity for a total of 3.3MGD.
- Improved wastewater effluent quality in compliance with permit requirements.

Existing Conditions and Project Impact – Environmental

CRRUA currently is permitted to discharge from its South WWTP only. Although the South WWTP meets its NPDES discharge requirements, it is operates at capacity, which severely limits the CRRUA's ability to provide adequate maintenance at the south plant or to accept new connections. The construction of the new WWTP, replacing the existing North WWTP, will allow the CRRUA to make needed upgrades and perform maintenance at the South Plant. The new WWTP will also ensure that the CRRUA has the capacity needed to deliver high quality effluent, and to provide needed services to a rapidly growing area of Doña Ana County.

Risks associated with discharges of untreated and/or inadequately wastewater present threats to the natural environment:⁶

- The increased levels of organic matter in the receiving body decreases dissolved oxygen (DO) in aqueous environment as a result of the organic matter breaking down. The reduced DO levels are detrimental to the health of aquatic plants and animals that need DO to live;
- Microbial pathogens can have negative impacts on public health and the health of the ecosystem;
- · Sedimentation from sewage can degrade native vegetation and soil; and

⁵ Information provided by CRRUA in email dated 9/22/2014, CRRUA has a total of 5,068 connections served by both the North and South Plants.

⁶ Source: http://www.water-matters.org/node/104.

• Sewage increases turbidity cutting off light to plants and animals.

The overall outcome of the project is anticipated to have a positive impact on the environment.

Mitigation of Risks

No negative long-term environmental impacts, related to the construction and operation of the replacement WWTP, have been identified. The existing plant is located on a 15-acre site which has sufficient space for the new facility. The site has already been disturbed and does not have any unique value in terms of biological resources. No new direct or indirect impact on land usage will be created by this facility. Water resources will be directly impacted by this Project since the new plant will discharge directly to the Rio Grande. Treated wastewater from the plant will meet effluent discharge limits, and will not have a negative impact on water quality in the river. Construction activities will result in fugitive dust and vehicular exhaust emissions that will have a negative impact on air quality. However, these impacts can be minimized through best management practices, and will only last for the duration of construction. Overall the long-term environmental impacts of the plant will be positive.

Natural Resource Conservation

The Project contributes to the conservation of natural resources by reducing environmental degradation, and the risks of contaminating surface waters and aquifers from discharges of untreated or inadequately treated wastewater. The replacement WWTP will provide CRRUA with the capacity to meet all of its discharge permit requirements, ensuring that effluent from CRRUA's treatment facilities will have a positive impact on water resources at its discharge point.

Impacts on natural resources have been taken into consideration in the design of the plant. For example, site earthwork has been designed to minimize the need for fill, to control erosion, and to minimize site runoff. Landscaping will be minimal and use xeric species to minimize water consumption. Concrete specifications have been written to allow the usage of recycled materials that will not negatively impact the concrete's strength. Plant blowers will be regulated by dissolved oxygen (DO) sensors to minimize energy demands. Buildings will include energy saving elements such as insulated panels, light transmitting ribbed panel roofing (PBR roofing), and efficient HVAC systems. A Ultra-violet (UV) disinfection system will be used to eliminate concerns related to Chlorination by-products. Although renewable energy installations were considered for the plant, they were generally not practical due to the limited space available at the site.

No Action Alternative

The No-Action alternative was not considered viable. Failing to construct the proposed Project will result in the continued use of the existing North WWTP for pre-treatment only. The South WWTP will continue to operate at capacity, the plants will not be able to provide service for future demands, and the risks of the South Plant failing to meet its permit obligations will increase.

Existing Conditions and Project Impact – Human Health

The increased capacity for wastewater treatment provided by this project will lead to additional human health benefits. According to the "World Health Organization Water, Sanitation and Hygiene Links to Health FACTS AND FIGURES – *updated November 2004", sanitation projects can have the following benefits to human health:

- Improved sanitation reduces diarrhea morbidity by 32%.
- One gram of feces may contain 10M viruses, 1M bacteria, 1000 parasitic cysts, and 100 worm eggs.
- 4% of global decease burden can be prevented through improved water supplies, sanitation, and hygiene.

Waterborne diseases are caused by pathogenic microorganisms that are transmitted as a result of inadequate wastewater disposal practices and unsafe water supplies. An individual may become ill after drinking water that has been contaminated with these organisms; eating uncooked foods that have been in contact with contaminated water; or through poor hygiene habits that contribute to the dissemination of diseases by direct or indirect human contact. Table 4 shows waterborne decease statistics for the State of New Mexico.

Table 4
WATERBORNE DISEASE STATISTICS FOR NEW MEXICO

Disease	N	Number of Annual Cases Per 100,000 Residents				
Disease	2006	2007	2008	2009	2010	
Campylobacteriosis	19	18	17	16	17	
E. Coli (STEC)	2.1	1.9	2.3	1.6	2.3	
Giardiasis	4	5.7	5	5.7	5.2	
Hepatitis A	0.8	0.6	0.9	0.5	0.2	
Shigellosis	8.5	5.1	7.3	4.2	7.8	

Source: New Mexico Department of State Health Services, Infectious diseases in Mexico 2011 Annual Report, values estimated from graphic data.

The Project will reduce the possibility of human contact with improperly disposed and partially treated or raw wastewater; as a result, it will eliminate the risks of water borne diseases.

Transboundary Effects

The only anticipated transboundary effects of the Project will result from effluent discharges to the Rio Grande. The effluent quality from the plant will be improved as a result of the Project. No negative transboundary impacts are anticipated as a result of the Project.

2.3. FINANCIAL CRITERIA

The total estimated cost of the Project is US\$11,700,000 which includes the funding for construction, supervision, and contingencies. The Project meets all BEIF program criteria and has been approved by EPA for a BEIF grant of up to US\$8,000,000 for the New Wastewater Treatment Plant to complete the financing of the Project. Table 4 presents a breakdown of total Project costs, as well as the sources of funds.

Table 4
USES AND SOURCES OF FUNDS
(US\$)

Uses	Amount	%
Construction, contingencies, supervision,	¢11 700 000	100%
& development costs	\$11,700,000	
TOTAL	\$11,700,000	100%
Sources	Amount	%
NADB-BEIF Grant	\$8,000,000	68%
State of NM Grant	\$3,700,000	32%
TOTAL	\$11,700,000	100%

3. PUBLIC ACCESS TO INFORMATION

3.1 PUBLIC CONSULTATION

BECC released the draft project certification proposal for a 30-day public comment period beginning February 5, 2015. The following documentation was made available upon request:

- City of Sunland Park Wastewater Treatment Plant Replacement, Preliminary Engineering Report, Molzen-Corbin & Associates, May 13, 2009.
- Sunland Park North Wastewater Treatment Plant, Environmental Information Document (EID), Parametrix, May 2009.
- EPA Finding of No Significant Impact for Expansion of the North Wastewater Treatment Plant, EPA, July 21, 2009.
- Technical Memorandum for Sunland Park North Wastewater Treatment Plant Replacement, Brown & Caldwell, December 2012.
- Final Design North Wastewater Treatment Plant Replacement, Bohannan-Huston, CDM Smith, Aegean Consulting, April 2014.
- EPA Finding of Significant Impact for Expansion of North Wastewater Treatment Plant, EPA, October 09, 2014.

The public comment period ended on March 7, 2015, with no comments received.

3.2 OUTREACH ACTIVITIES

CRRUA has conducted outreach efforts to communicate the Project goals, benefits, costs, and impacts. In accordance with the public outreach requirements of the U.S.-Mexico Border Water Infrastructure Program, activities such as the use of a local steering committee, public meetings, and appropriate project information access where conducted as described in the Public Participation Plan (PPP). The following information provides a summary of the outreach activities carried out to support this Project.

The Local Steering Committee was formed on March 31, 2014. The steering committee developed a PPP and periodically met to help the Utility to disseminate information regarding the Project. The Project's technical and financial information has been made available to the public for review. Information on the Project was presented to the community during public meetings held on April 29, 2014 and January 26, 2015. The first public meeting was advertised on March 28, 2014 and the second public meeting was advertised on January 8, 2015. Neither of the formal public meetings were attended by many community residents; however, the proposed Project has been in development for more than six years with updates have been provided on a periodic basis during the utility's board meetings. In this case, since the Project will use the site of the existing failed facility, opposition to the Project has not been identified.

Additional outreach activities were undertaken to develop support for this Project from stakeholders at the local, regional and statewide level. The results of the Project's Technical Memorandum were presented CRRUA's August 2012 board meeting to ensure that the board approved of this Project's revised scope. State funding was obtained from the New Mexico Finance Authority (NMFA) Colonias Fund to support the Project's design. Assistance to secure construction funds was provided by local politicians and leaders including Bill Mattiace, Mary Helen Garcia, and Gilbert Mesa. Finally, BECC and NADB personnel met with the Office of the NM Secretary of Economic Development's to promote the Project.

BECC conducted a media search to identify any other potential public opinion about the Project. Links to news articles related to the Project are provided below:

- https://donaanacounty.org/node/135984
 (Published September 22, 2011, provides a Doña Ana County Statement regarding the creation of CRRUA, and the merger of DAC and CRRUA systems.)
- http://www.elpasotimes.com/ci_20203736/sunland-park-may-face-utility-woes-new-development

(Published March 19, 2012, discusses the city's obligations to provide water and wastewater services to new developments.)

- http://www.lcsun-news.com/ci_20375381/sunland-park-sewage-topic-u-s-senate-field?IADID=Search-www.lcsun-news.com-www.lcsun-news.com
 (Published April 11, 2012, discusses need for WWTP capacity and upgrades to North WWTP.
- http://www.lcsun-news.com/las_cruces-business/ci_25515946/martinez-cuts-ribbon-new-road-announces-water-projects
 (Published April 04, 2014, mentions the state of New Mexico's commitment of \$3.7M to the North WWTP project.)

Opposition to the Project was not detected from the available media coverage or by the Project outreach activities. The Project Sponsor has followed all public consultation requirements in order to comply with applicable environmental clearance and participating program funding sources.