

**Environmental Assessment
Determinations and Compliance Findings
for HUD-assisted Projects
24 CFR Part 58**

Project Information

Project Name: Mobile-Integrated-Healthcare-Facility

HEROS Number: 900000010522676

Start Date: 03/04/2026

Responsible Entity (RE): LAS CRUCES, P.O. BOX CLC LAS CRUCES NM, 88004

RE Preparer: Raymond Burchfield

State / Local Identifier: NM/CLC

Certifying Officer: Sonya Delgado

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable): Terracon, Inc.

Point of Contact: Tanya Mitra

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

- ✓ By checking this box, I attest that as a consultant, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

Project Location: 390 N Valley Dr, Las Cruces, NM 88005

Additional Location Information:

The project site is located at 390 North Valley Drive, Las Cruces, Dona Ana County, New Mexico (32.30791, -106.79439). The project site encompasses an approximately 0.74-acre tract of land improved with a 7,883 square feet (sq ft) building that formerly operated as Fire Station #3 for the City of Las Cruces. The site is located at the southeast corner of N. Valley Drive and Hayner Avenue. (See Figure 1 - Project Location, and Site Design Plans).

Direct Comments to:

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

This project will develop a new facility that will be known as the Mobile Integrated Healthcare Facility. The City of Las Cruces is proposing to partially demolish and add an expansion to the existing former Fire Station #3 building to create the new Mobile Integrated Healthcare (MIH) Station. The proposed project will expand the existing 7,883 sf building to approximately 7,408 sf of interior space that will house services, personnel, offices, storage, apparatus and equipment bays and storage, as well as living quarters including sleeping, restroom, shower, and kitchen/dining facilities. The proposed building height at the highest elevation is approximately 24 feet. The proposed project will remain within the existing property boundaries and will not require additional land acquisition. The Mobile Integrated Health program will provide resources to resolve health care problems by sending paramedics and social workers to visit frequent 911 callers which lack other options to receive care. The program would add personnel to the fire department that understand how to de-escalate and treat a mental health crisis. This project is partially funded with a \$3,000,000 CPF through Senator Heinrich, as well as State Capital Outlay and other sources.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The Las Cruces region is currently lacking in long term mental health treatment services. To continue to grow and provide valuable services to our community, funding is needed to design, construct, and furnish a response station for the Project LIGHT program associated with the MIH program. The mission of the Mobile Integrated Health Program is to "assist and navigate citizens to health and human resources to solve their health care problems". The building does not meet current building code and design requirements for proposed future use. Additionally, the building does not meet mechanical, electrical and plumbing (MEP) systems for the proposed future use due to age. The building systems are inadequate to service the

Las Cruces community during emergencies. The purpose is to provide a facility that will meet current specifications, building code and provide the required access accommodations for new services for mental health response for critical needs.

Existing Conditions and Trends [24 CFR 58.40(a)]:

City of Las Cruces continues to increase the healthcare system in the area. By providing community citizens, especially seniors, Mobile Integrated Health system is "in a unique position to recognize, correct and prevent poor health outcomes (City of Las Cruces). City of Las Cruces continues to plan by targeting assistance to members of the community improving the quality of life through direct interaction and providing medical and critical mental health services to meet community needs. Currently, the old fire station No. 3 building is not in use, and operations are closed. Fire Station There are no other known proposed plans or uses for the site; the site would remain empty if the project is not constructed. Future use of the surrounding areas are not planned at this time. The project will be scoped with office space to accommodate the current and projected future sizes. Space for community meetings, patient evaluations, team member respite, and storage for equipment and vehicles. This project is not a part of a larger project and is one of the first MIHs in the area to provide critical health care services (Attachment L, Land Use and Community Facilities Map)

Maps, photographs, and other documentation of project location and description:

[MIH Project Location 2.pdf](#)

[MIH Project Location.pdf](#)

Determination:

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

Approval Documents:

7015.15 certified by Certifying Officer
on:

7015.16 certified by Authorizing Officer
on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B-24-CP-NM-1486	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants	\$3,000,000.00

Estimated Total HUD Funded, \$3,000,000.00
Assisted or Insured Amount:

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$11,000,000.00

Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	☐ Yes ☒ No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	☐ Yes ☒ No	This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	☐ Yes ☒ No	The project area is not within a 100-year or 500-year floodplain as indicated on the Federal Emergency Management Agency (FEMA)'s National Flood Hazard Layer (NFHL) Map, effective on July 6, 2016 (Attachment C). The project is in compliance with Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]. No further compliance activities are necessary.

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	☐ Yes ☒ No	State Implementation Plan (SIP) for the New Mexico area, all of Dona Ana County is within an area of partial non-attainment of the 2008 Ozone Standard and of moderate non-attainment of the 2015 Ozone Standard. Activities would not conflict with Existing Ozone Control Measures Applicable to the New Mexico - Dona Ana County Nonattainment Area. Implementation of standard best management practices (BMP) would control dust and other emissions during construction and grading activities. Per the State of New Mexico Environment Department infrastructure State Implementation Plan (iSIP) for the 2015 Ozone National Ambient Air Quality Standard to the EPA dated November 1, 2018, projects of this scope and nature would have no notable impacts on air quality nor affect the attainment status of the area; therefore, a SIP letter of consistency is not necessary. The project is in compliance with the Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93. No further compliance activities are necessary. See State of New Mexico Environment Department SIP; Greenbook 8-hour ozone non-attainment areas; Criteria Pollutant Nonattainment Summary Report, EPA, City of Las Cruces Climate Action Plan (Attachment D).
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	☐ Yes ☒ No	This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	☐ Yes ☒ No	A Phase I Environmental Site Assessment (ESA) was completed on June 23, 2025 to determine recognized environmental conditions (RECs) and the presence/absence of hazardous

		facilities of concern within 3,000 feet or superfund sites within one mile of the proposed project activity. The Phase I ESA did not identify on-site or adjacent recognized environmental conditions (RECs) to the site. The current fire station was constructed in 1968 (as determined by a SOI qualified architectural historian). Prior to 1978, Lead- Based Paint (LBP) was commonly utilized; however, sampling did not show LBP to be present within the structure. Prior to 1982, Asbestos-Containing Materials (ACM) was utilized within structures and based upon the age of the building it is assumed to be present within the structure. Based upon previous ACM sampling, ACM is present within the facility. The asbestos at concentration equal to or greater than 1 percent in the following materials: * 9" x 9" Ceramic Wall Tile (Joint compound) * Flashing (Roof) * Exterior Stucco (Peach-exterior walls) * Cove Base (Living Room & Hallways) * Textured CMU Coating * Window Glazing (Kitchen) Since friable ACM has been found, abatement/ demolition and disposal of the materials is mandatory and disposal must be in accordance with all local, state, and federal laws. The contractor must follow appropriate worker safety and LBP and ACM disposal regulations and policies. These include: * National Emission Standard for Asbestos, standard for demolition and renovation, 40 CFR 61.145 * National Emission Standard for Asbestos, standard for waste disposal for manufacturing, fabricating, demolition, and spraying operations, 40 CFR 61.150 * HUD LBP regulations in 24 CFR 35(b)(h)(j) * HUD Radon regulations in 24 CFR 58.5(i). The project was reviewed using Center for Disease Control (CDC), data for lab
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		samples for median pre-mitigation in the area. The radon level in the laboratory data for this area was less two pCi/L, which is less than threshold of four pCi/L. Additional testing is not required for compliance. All materials removed from the site will be disposed of and transported in accordance with New Mexico Environment Department Air Quality Bureau. Materials will be tracked, and manifests completed as required. Upon completion of the transportation and disposal, a disposal site ticket should be presented to the site owner or inspector technician and included in the ERR. The project is in compliance with the Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2). No further compliance activities are necessary. See Attachment E for Phase I ESA, Asbestos and Lead-Containing, Paint Survey Report, CDC Radon Test from Labs (2008-2017)
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	☐ Yes ☒ No	Review of the official list provided by the US Fish and Wildlife Service (USFWS) identified within the IPaC report identified the Sneed Pincushion Cactus (<i>Coryphantha sneedii</i> var. <i>sneedii</i>) as endangered and known to occur in the county. Additionally, the IPaC report identifies these federally listed species known to occur in the county: * Mexican Wolf (<i>Canis lupis baileyi</i>) and the Northern Aplomado Falcon (<i>Falco femoralis septentrionalis</i>) listed as Experimental Population, Non-Essential; * Yellow-billed Cuckoo (<i>Coccyzus americanus</i>) listed as threatened; and Monarch Butterfly (<i>Danaus plexippus</i>) as proposed threatened. The project area includes limited open space and includes scattered trees and shrubs. None of the species listed utilize the vegetation / habitat on the site. The species list was

		obtained from the USFWS using the Information for Planning and Consultation System on May 27, 2025. A review of state-listed and known reported occurrences of threatened or endangered species in the project vicinity was completed by consultation with the New Mexico Department of Game and Fish (NMDGF). Results of the inquiry determined that no species were identified in the immediate area (see Attachment F for the Protected Species Habitat Assessment). Due to the historic nature of the sightings, lack of suitable habitat, and the significant fragmentation of the surrounding area it was determined these species could not be supported at the subject property and therefore will not be impacted. As proposed, the project will have No Effect on federally listed species. The property has a tree and other vegetation in the surroundings where migratory birds may nest; therefore, project activities which include vegetation removal should occur outside of the peak nesting period of March through August to avoid destruction of individuals or eggs. However, if land clearing activities must be conducted during this time, a survey for active nests should be conducted by a qualified biologist no more than 7-10 days prior to commencing work. As proposed, the project will have No Effect on federally listed species. The project is in compliance with the Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402. No further compliance activities are necessary. Attachment F -USFWS Critical Habitat Map, Protected Species Habitat Assessment, IPAC Report, Natural Heritage - Biota Information System New Mexico Species List.
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Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	☐ Yes ☒ No	Locations of HUD-assisted projects involving new residents, an increase in residential density, or introduction of new explosive and flammable hazards must have acceptable separation distances (ASD) between residences and the stationary hazardous operations that store, handle, or process chemicals or petrochemicals of an explosive or flammable nature. The proposed project includes activities such as redevelopment of the retired Fire Station 3 with a Mobile Integrated Healthcare Station. The project would not increase residential density and use. Handling of hazardous flammable fuels or storage facilities would not occur and precludes the project from further evaluation under this section. The project is in compliance with Explosive and Flammable Hazards 24 CFR Part 51 Subpart C. No effects are anticipated, and no further compliance activities are necessary.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	☐ Yes ☒ No	The proposed project occurs on urban land developed with retired Fire Station 3 and associated paved parking lot. The project does not contain lands that are designated prime farmland or farmland of statewide importance (Attachment G). The project is in compliance with Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658.No further compliance activities are necessary.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	☐ Yes ☒ No	The project area is not within the Federal Flood Risk Management Standard (FFRMS), The FFRMS floodplain for the project area was defined using the 0.2-Percent Annual Chance Floodplain Approach based on the FEMA Flood Insurance Rate Maps (FIRMs) Panel Number 35013C1091G, effective on July 6, 2016. Climate Informed Science Approach (CISA) data was not available for this location. There

		are no critical actions within the 100 or 500-year floodplains (Attachment C). The project is in compliance with Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55. No further compliance activities are necessary.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	☒ Yes ☐ No	Based on Section 106 consultation the project will have an Adverse Effect on historic properties. With mitigation, as identified in the MOA or SMMA, the project will be in compliance with Section 106. Satisfactory implementation of the mitigation should be monitored.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	☐ Yes ☒ No	The Mobile Integrated Healthcare Station project does not include residential use and is not subject to HUD noise assessment. All noise generated activities including the use of sirens will be conducted in accordance with City ordinances and guidelines. No further evaluation of compliance actions under HUD's noise regulation are required. The project is in compliance with Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	☐ Yes ☒ No	According to the U.S. Environmental Protection Agency's (EPA) Source Water Protection, Sole Source Aquifer Protection Program, Las Cruces, Dona Ana County, has no sole source aquifers. The closest sole source aquifer is the Upper Santa Cruz & Avra Basin SSA, approximately 230 miles west of the project area (Attachment I). Also, the project involves no activities affecting sole source aquifers as the facility would utilize municipal water. The project is in compliance with Sole Source Aquifers - Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149. No further compliance activities are necessary.

Wetlands Protection Executive Order 11990, particularly sections 2 and 5	☐ Yes ☒ No	Review of the National Wetlands Inventory map and confirmation of site conditions during the performance of the Phase I ESA shows no indication of wetlands on the site. Therefore, the project is in compliance with Wetlands Protection Executive Order 11990, particularly sections 2 and 5. No further compliance activities are necessary. See Attachment J, Wetland Protection, National Wetlands Inventory Map.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	☐ Yes ☒ No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	According to the City of Las Cruces Community Development Department Zoning GIS Map, the facility is zoned as Industrial Standard (LI), Attachment L. The proposed redevelopment of the facility complies with the City's zoning.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	3	Demolition, removal of structures and new structure materials throughout the area would create hazards typical of construction sites. During implementation of the project, demolition, grading, and reconstruction activities may result in temporary elevation of ambient noise levels in immediate areas around target properties. Noise impacts would be addressed by conducting these activities during normal working hours on weekdays in accordance with local noise regulations, and with proper construction equipment maintenance. Standard BMPs, such as construction fencing, would be applied to protect the public from hazards during structure demolition and removal.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	Demolition, removal of structures and new structure materials throughout the area would create hazards typical of construction sites. During implementation of the project, demolition, grading, and reconstruction activities may result in temporary elevation of ambient noise levels in immediate areas around target properties. Noise impacts would be addressed by conducting these activities during normal working hours on weekdays in accordance with local noise regulations, and with proper construction equipment maintenance. Standard BMPs, such as construction fencing, would be applied to protect the public from hazards during structure demolition and removal.	
SOCIOECONOMIC			
Employment and Income Patterns	2	The Mobile Integrated Healthcare Station will serve as a health service provider in the area. Due to the nature and size of the project, it is assumed that a local	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		construction company will utilize existing employees to perform the construction activities. As the construction activities would employ local companies, no temporary increase in employment is anticipated. Upon construction, existing staff will be relocated to the newly constructed building from other centers and existing health industry. No impact to employment is anticipated.	
Demographic Character Changes / Displacement	2	Demographics of the immediate area would not change because of the demolition and reconstruction of the structure as the facility will not increase residential density. Residents and businesses in the area will not be affected by the project and no displacement will occur.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	Based upon the nature of the project there will be no increase in population. The project will not affect educational and cultural facilities (Attachment L).	
Commercial Facilities (Access and Proximity)	2	Based upon the nature of the project there will be no increase in population who would utilize these facilities and no impact would occur.	
Health Care / Social Services (Access and Capacity)	1	Health care and social services facilities would be beneficially impacted by the proposed project. The proposed project would benefit access to health care, emergency and social services to the public. It would not increase demand for health care and social services facilities but would provide additional services to the community.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	1	Demolition of the structure would result in solid waste generation. LBP and ACM materials will be abated/demolished, transported off-site, and disposed of in accordance with: * New Mexico Environment Department (NMED) on the Demolition of Small Residential Buildings by Municipalities * National Emission Standard	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		for Asbestos, standard for demolition and renovation, 40 CFR 61.145 * National Emission Standard for Asbestos, standard for waste disposal for manufacturing, fabricating, demolition, and spraying operations, 40 CFR 61.150 * HUD LBP regulations in 24 CFR 35(b)(h)(j) * HUD Radon regulations in 24 CFR 58.5(i). The removal of these materials will be a benefit to those who will be working with the existing facility during demolition as the potential for exposure will be removed. The City of Las Cruces supports demolition activities similar to the proposed project and operates waste disposal facilities across the city. Project-wide salvaging/recycling of materials from demolition of the structure (e.g. copper wire and plumbing, concrete rubble) would occur as determined feasible in accordance with the City requirements. All other materials would be taken to the appropriate landfills designated by City or Dona Ana County. LBP and ACM materials require proper coordination and disposal with certified handlers or specialized facilities such as the South Central Solid Waste Authority (SCSWA). LBP and ACM are classified as 'special waste' and require disposal at an authorized facility requiring a signed manifest. A solid waste management plan should be developed and implemented to ensure potentially hazardous solid waste is handled properly, and daily capacities of landfills and other solid waste facilities are not exceeded. All waste will be disposed of appropriately and with any applicable permitting.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The existing wastewater/sanitary sewer system connections to the property would remain. Waste water from the project site would cease temporarily and will resume when redevelopment has been completed.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		No additional requirements to discharge wastewater is required.	
Water Supply (Feasibility and Capacity)	2	Connections to the existing water supply system for the facility will remain. Operations will be ceased temporarily during demolition and redevelopment of the property and will resume when construction is completed. No additional drinking water is anticipated as the number of facility personnel is anticipated to remain the same or if increased, the use of water efficient systems is anticipated to off-set the increase. The Las Cruces Municipal Water System Consumer Confidence Report (2024) is below the EPA levels of water quality standards and Maximum Contaminant Level Goals (MCLGs) and all tested contaminants are within safe levels (Attachment L).	
Public Safety - Police, Fire and Emergency Medical	1	The project will not involve temporary removal of emergency services, fire and medical, in the immediate area since the existing facility is not operational. The new Fire Station No. 3 is proposed adjacent to the proposed project site located at 380 North Valley Drive. The closest health center, Amador Health Centr is located -.64 mile south from the former Fire Station #3 facility. Upon completion of construction, services to the area will remain unchanged. The project will benefit the community by providing new services for mental health response for critical needs as the Las Cruces region is currently lacking in long term mental health treatment. The added services will continue to grow and provide valuable services to our community.	
Parks, Open Space and Recreation (Access and Capacity)	2	The proposed project would not create or destroy any new parks, open space, or recreational activities. It also would not increase use of those facilities.	
Transportation and Accessibility (Access and Capacity)	3	The project would not impact local transportation facilities. Due to the lack of residential use in connection with the	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		project, an increase demand on the local public transit system is not expected. During project implementation, a temporary increase in traffic along the road into the project site would occur to accommodate construction workers and equipment (including waste hauling equipment).	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	The project would result in the reconstruction of the existing property. It will not affect natural features or water resources.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The project would result in no change in land use. The property currently does not have habitat that supports wildlife as there is no habitat that would promote wildlife, no impact is anticipated. The project would involve demolition, minor excavation, and minor backfill.	
Other Factors 1		No other factors were identified that would be affected by the proposed project.	
Other Factors 2			
ENERGY			
Energy Efficiency	2	As a result of the building facility not currently in operation or use, when the proposed project is reconstructed, energy demand will increase in the immediate area when demolition begins . Once reconstruction is completed, energy consumption will increase as operations expand. However, building windows for the facility are proposed for improved energy efficiency.	

Supporting documentation[MIH ERR DOC Part 6.pdf](#)[MIH ERR DOC Part 5.pdf](#)[MIH ERR DOC Part 4.pdf](#)[MIH ERR DOC Part 3.pdf](#)[MIH ERR DOC Part 2.pdf](#)[MIH ERR DOC Part 1.pdf](#)**Additional Studies Performed:**

Phase I Environmental Site Assessment (ESA), Terracon, June 23, 2025 Cultural Resources Desktop Review, Terracon, July 7, 2025 Protected Species Habitat Assessment, Terracon, June 23, 2025 Asbestos and Lead-Containing Paint Survey Report, Terracon, June 23, 2025

Field Inspection [Optional]: Date and completed
by:

Rachelle K. Christian

5/29/2025 12:00:00 AM

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

* Federally Recognized Native American Tribes: A total of six tribes including White Mountain Apache Tribe, the Comanche Tribe, the Fort Sill Apache Tribe, Isleta del Sur Pueblo, the Mescalero Apache Tribe, and Pueblo of Islet were contacted. * The US Fish and Wildlife (USFWS) - Information and Planning Consulting (IPAC) * New Mexico Historic Preservation Division's (NMHPD) * New Mexico Cultural Resources Information System (NMCRIS) * Correspondence with Raymond Burchfield, Neighbourhood Programs Specialist, City of Las Cruces * Correspondence with Orlando Granado, Senior Project Manager, City of Las Cruces * Center for Disease Control and Prevention, Radon Tests from Labs, Median Pre-Mitigation Radon levels in Tested Buildings, New Mexico, 2008-2017 * 2024 Consumer Confidence Report, Annual Water Quality, Las Cruces Municipal Water System * EPA Greenbook 8-hour Ozone * New Mexico Environment Department * New Mexico Department of Game and Fish * U.S. Fish and Wildlife National Wetland Inventory * Federal Emergency Management Agency * National Rivers Inventory * City of Las Cruces, Climate Action Plan, July 2020

List of Permits Obtained:

All demolition, construction and hazardous waste permitting will be completed prior to construction activities.

Public Outreach [24 CFR 58.43]:

A combination notice to the public will be published as soon as the review is complete.

Cumulative Impact Analysis [24 CFR 58.32]:

No cumulative impacts will occur within the project boundary. There are no other projects that are anticipated within the vicinity of the project. The proposed project

has been and is currently developed. Expansion of the existing footprint would not result in significant cumulative impact. Cumulative beneficial impacts of increasing vehicle accessibility and safety of facility personnel would be significant. Impervious covers and surface water discharge will not change from previous and future project activities. Construction stormwater runoff will be addressed by the contractor using BMPs.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

The Council on Environmental Quality's A Citizens Guide to the NEPA defines reasonable alternatives as "those that substantially meet the agency's purpose and need." The purpose and need established for this project by the City of Las Cruces is to meet the need for and access to health care, emergency and social services to the public. No other alternatives were considered since existing resources such as the adequate lot size, building type and layout were available. Also, considerations were made to review sites central to the represented population dependent on critical mental health services in the vicinity. Any other alternatives would consider increased fees with additional studies and create higher risk for environmental impacts.

No Action Alternative [24 CFR 58.40(e)]

Under the no action alternative, the redevelopment of the property would not take place with the Mobile Integrated Healthcare Station and critical mental health services for public would not be accessible. This new service would not be available to the community and risk to individuals needing mental health services and care would diminish.

Summary of Findings and Conclusions:

Under the proposed action, no significant impacts are anticipated. Best management and mitigation practices have been identified for the redevelopment of the facility as described in the Mitigation Measures and Conditions section of this ERR. Temporary impacts to the community of the City of Las Cruces will not occur as the facility is currently not in use during the demolition and construction activities. Emergency services will not be interrupted as other fire stations are available at other nearby locations. Upon completion of construction, the Mobile Integrated Healthcare Station will provide additional community services and benefit the City of Las Cruces. During demolition, the structure will need to be inspected, and visible chipping/peeling paint would be tested for non-encapsulated asbestos-containing materials (ACM). The disposal site ticket should be presented to the site owner or inspector technician and included in the ERR. City of Las Cruces entered into an MOA with NMHPD to establish mitigation measures to compensate for the impact to the eligible property, specifically the demolition of the fire station. All mitigation measures stated would need to be completed, in compliance with the MOA. Substantive changes to the scope of work of the proposed activity, including a change in project location, would

require revision and resubmission of the EA to be in compliance with the National Environmental Policy Act (NEPA) and other laws and Executive Orders. This review addresses all HUD NEPA requirements under 24 CFR Part 58; however, it does not address all federal, state, and local requirements. Acceptance of federal funding requires the recipient to comply with all federal, state, and local laws, and obtain all appropriate federal, state, and local environmental permits and clearances for this project.

Mitigation Measures and Conditions [CFR 1505.2(c)]:

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Historic Preservation	STIPULATIONS The City shall ensure that the following measures are carried out: A. Prior to demolition, the City will hold a "Celebration of Service" for Fire Station No.3, with appropriate elected officials and staff present, to reflect on the building's history and service to the City of Las Cruces. The celebration will be announced in a press release, to be published on line and sent to news outlets no later than two weeks prior to the celebration. An event listing for the	N/A	The Section 106 review for the MIH project resulted in a finding of eligibility for inclusion in the National Register of Historic Places (NRHP) for the fire station building, with its demolition being determined an "adverse effect" to the eligible property. The city determined that it could not avoid or minimize impacts to the fire station. Subsequently, a resolution to the process was sought by entering into an MOA with NMHPD to establish mitigation measures to compensate for the	

	celebration will also be published on the City's events calendar and on the City's Face book. The celebration will be covered by the City's communication office and will be livestreamed and shared on the City's YouTube channel. B. The City shall complete a documentation report on Fire Station No.3. The report shall include: 1.tPhotographs of the exterior and interior, documenting all four elevations and significant interior spaces. 2.tCopies of existing architectural drawings. 3.tBrief history of the building. 4.tA draft of the documentation report shall be submitted to NM SHPO for review and comments by NM SHPO. 5.tOnce the final report has been submitted to NM SHPO and NM SHPO is satisfied with the report, then demolition may commence. C. Fire Station No. 9's dedicated exhibit space will include a permanent display of Fire Station No. 3's		impact to the eligible property, specifically the demolition of the fire station. The City of Las Cruces' MOA with SHPO was signed on February 23, 2026, and identifies four (4) mitigation measures the City is required to undertake to mitigate for the adverse effect finding. The four mitigation measures are: 1. A celebration of service for the fire station building, to be held prior to demolition; 2. Preparation of a historical documentation report on the history of Fire Station No. 3, along with its sister Fire Station No. 2; 3. Dedication of a permanent display of Fire Station No. 3's history at Fire Station No. 9's exhibit space; and 4. Nomination of Fire Station No. 2, No. 3's sister station, to the City of Las Cruces Register of Cultural Properties, pursuant to Las Cruces Municipal Code 35-2(D)(2) The MOA is intended to last for five (5) years. To date, the City of Las Cruces has completed mitigation measure #2. All mitigation	
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	history and service. A description of the building and information on its historic and architectural significance, accompanied by a historic photo, will be included in the display. D. Fire Station No. 3's sister station, Fire Station No. 2, will be nominated to the City of Las Cruces Register of Cultural Properties. A nomination form will be completed according to the Las Cruces Municipal Code 35-2(0)(2) by the City's historic preservation program, to be voted on by the Historic Preservation Committee and City Council when nominations are brought before both bodies for approval and designation. The City's historic preservation specialist will work to move the nomination forward to a successful conclusion.		measures stated would be completed and in compliance with the MOA.	
Contamination and Toxic Substances	Remediation of Asbestos and LBP will take place before demolition.	N/A	During demolition, the structure will be inspected, and visible chipping/peeling paint would be tested for non-encapsulated asbestos-containing	

			materials (ACM). If friable ACM is found, abatement/demolition and disposal of the materials would follow appropriate worker safety practices and ACM disposal regulations and policies, including: * New Mexico Environment Department (NMED) Asbestos Section of the Air Quality Bureau (aqb) on the Demolition of Small Residential Buildings by Municipalities * National Emission Standard for Asbestos, standard for demolition and renovation, 40 CFR 61.145 * National Emission Standard for Asbestos, standard for waste disposal for manufacturing, fabricating, demolition, and spraying operations, 40 CFR 61.150 Construction debris would be removed from site and disposed of in accordance with solid waste management regulations. Clearing and grubbing activities may occur to prepare the area of the placement of the foundation and associated ADA	
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			accessible route. Materials that contain ACM will be removed, transported, and disposed of in accordance with applicable laws under 24 CFR Part 50.3(i) & 58.5(i)(2). In order to keep track of the contaminated soil being hauled away from the site, a load manifest system should be used to keep an exact record of the time and location of disposal. The disposal site ticket should be presented to the site owner or inspector technician and included in the ERR.	
Migratory Bird Treaty Act	Under the MBTA, statutory authority of 16 U.S.C sections 703-712 for protection of birds, project activities which include vegetation removal should occur outside of the peak nesting period of March through August to avoid destruction of individuals or eggs. However, if land clearing activities must be conducted during this time, a survey for active nests should be conducted by a qualified biologist no more than 7-10 days	N/A	Do not demo in the spring when it could effect hatchlings.	

	prior to commencing work.			
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	The project will comply with the New Mexico Environment Department's (NMED) Point Source Regulation requirements. Authorization under the permit will be obtained and an Point Source Regulation requirements will be prepared and implemented by the Contractor.	N/A	A SWPP will be permitted and performed per the statutes.	

Project Mitigation Plan

remediation of hazardous materials will take place before demolition. The effects of the demolition of the building will be mitigated as agreed upon in the MOU with NMSHPO.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

✓ No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[AirportClearzoneMemo-2014.pdf](#)
[AirportClearzone Consultation.pdf](#)
[MIH Airport Hazards.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

[MIH Coastal Barrier.pdf](#)
[Coastal Area Map ADA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

- ✓ No. This project does not require flood insurance or is excepted from flood insurance.

Based on the response, the review is in compliance with this section.

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

- ✓ No

Screen Summary

Compliance Determination

The project area is not within a 100-year or 500-year floodplain as indicated on the Federal Emergency Management Agency (FEMA)'s National Flood Hazard Layer (NFHL) Map, effective on July 6, 2016 (Attachment C). The project is in compliance with Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]. No further compliance activities are necessary.

Supporting documentation

[MIH FM35013C1091G.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

☒ Yes

☐ No

Air Quality Attainment Status of Project's County or Air Quality Management District

2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

☒ No, project's county or air quality management district is in attainment status for all criteria pollutants.

Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

Screen Summary**Compliance Determination**

State Implementation Plan (SIP) for the New Mexico area, all of Dona Ana County is within an area of partial non-attainment of the 2008 Ozone Standard and of moderate non-attainment of the 2015 Ozone Standard. Activities would not conflict with Existing Ozone Control Measures Applicable to the New Mexico - Dona Ana County Nonattainment Area. Implementation of standard best management practices (BMP)

would control dust and other emissions during construction and grading activities. Per the State of New Mexico Environment Department infrastructure State Implementation Plan (iSIP) for the 2015 Ozone National Ambient Air Quality Standard to the EPA dated November 1, 2018, projects of this scope and nature would have no notable impacts on air quality nor affect the attainment status of the area; therefore, a SIP letter of consistency is not necessary. The project is in compliance with the Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93. No further compliance activities are necessary. See State of New Mexico Environment Department SIP; Greenbook 8-hour ozone non- attainment areas; Criteria Pollutant Nonattainment Summary Report, EPA, City of Las Cruces Climate Action Plan (Attachment D).

Supporting documentation

[NEAP-Reevaluation2005DonaAnaCounty.pdf](#)

[EPAmay8hr 2015.pdf](#)

[CLC Climate Action Plan.pdf](#)

[Clean Air Doc DAC.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Screen Summary

Compliance Determination

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[MIH Coastal Barrier\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

General Requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
https://www.onecpd.info/environmental-review/site-contamination		

1. How was site contamination evaluated?* Select all that apply.

☒ ASTM Phase I ESA

☐ ASTM Phase II ESA

☐ Remediation or clean-up plan

☐ ASTM Vapor Encroachment Screening.

☐ None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances* (excluding radon) found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

Provide a map or other documentation of absence or presence of contamination** and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

No

Explain:

✓ Yes

* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

** Utilize EPA's EnviroMapper, NEPAAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?

✓ Yes

Explain:

This building will be demolished. The new building will be tested when complete.

No

* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental

review must include a consideration of radon using one of the methods in Section A below.

8. Mitigation

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental impacts cannot be mitigated, then HUD assistance may not be used for the project at this site.

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

No, all adverse environmental impacts cannot feasibly be mitigated.
Project cannot proceed at this location.

- ✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
Provide all mitigation requirements** and documents in the Screen Summary at the bottom of this screen.

* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

** Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

9. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls*, or use of institutional controls**.

Remediation of Asbestos and LBP will take place before demolition.

If a remediation plan or clean-up program was necessary, which standard does it follow?

- ✓ Complete removal

Risk-based corrective action (RBCA)

Other

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

** Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

Screen Summary

Compliance Determination

A Phase I Environmental Site Assessment (ESA) was completed on June 23, 2025 to determine recognized environmental conditions (RECs) and the presence/absence of hazardous facilities of concern within 3,000 feet or superfund sites within one mile of the proposed project activity. The Phase I ESA did not identify on-site or adjacent recognized environmental conditions (RECs) to the site. The current fire station was constructed in 1968 (as determined by a SOI qualified architectural historian). Prior to 1978, Lead- Based Paint (LBP) was commonly utilized; however, sampling did not show LBP to be present within the structure. Prior to 1982, Asbestos-Containing Materials (ACM) was utilized within structures and based upon the age of the building it is assumed to be present within the structure. Based upon previous ACM sampling, ACM is present within the facility. The asbestos at concentration equal to or greater than 1 percent in the following materials: * 9" x 9" Ceramic Wall Tile (Joint compound) * Flashing (Roof) * Exterior Stucco (Peach-exterior walls) * Cove Base (Living Room & Hallways) * Textured CMU Coating * Window Glazing (Kitchen) Since friable ACM has been found, abatement/ demolition and disposal of the materials is mandatory and disposal must be in accordance with all local, state, and federal laws. The contractor must follow appropriate worker safety and LBP and ACM disposal regulations and policies. These include: * National Emission Standard for Asbestos, standard for demolition and renovation, 40 CFR 61.145 * National Emission Standard for Asbestos, standard for waste disposal for manufacturing, fabricating, demolition, and spraying operations, 40 CFR 61.150 * HUD LBP regulations in 24 CFR 35(b)(h)(j) * HUD Radon regulations in 24 CFR 58.5(i). The project was reviewed using Center for Disease Control (CDC), data for lab samples for median pre-mitigation in the area. The radon level in the laboratory data for this area was less two pCi/L, which is less than threshold of four pCi/L. Additional testing is not required for compliance. All

materials removed from the site will be disposed of and transported in accordance with New Mexico Environment Department Air Quality Bureau. Materials will be tracked, and manifests completed as required. Upon completion of the transportation and disposal, a disposal site ticket should be presented to the site owner or inspector technician and included in the ERR. The project is in compliance with the Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2). No further compliance activities are necessary. See Attachment E for Phase I ESA, Asbestos and Lead-Containing, Paint Survey Report, CDC Radon Test from Labs (2008-2017)

Supporting documentation

[LBT Asbestos Test MIH.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service ("FWS" and "NMFS" or "the Services").	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect species or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

- ✓ Yes, the activities involved in the project have the potential to affect species and/or habitats.

2. Are federally listed species or designated critical habitats present in the action area?

- ✓ No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below. Documentation may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.

Yes, there are federally listed species or designated critical habitats present in the action area.

Screen Summary

Compliance Determination

Review of the official list provided by the US Fish and Wildlife Service (USFWS) identified within the IPaC report identified the Sneed Pincushion Cactus (*Coryphantha sneedii* var. *sneedii*) as endangered and known to occur in the county. Additionally, the IPaC report identifies these federally listed species known to occur in the county: * Mexican Wolf (*Canis lupis baileyi*) and the Northern Aplomado Falcon (*Falco femoralis septentrionalis*) listed as Experimental Population, Non-Essential; * Yellow-billed Cuckoo (*Coccyzus americanus*) listed as threatened; and Monarch Butterfly (*Danaus plexippus*) as proposed threatened. The project area includes limited open space and includes scattered trees and shrubs. None of the species listed utilize the vegetation / habitat on the site. The species list was obtained from the USFWS using the Information for Planning and Consultation System on May 27, 2025. A review of state-listed and known reported occurrences of threatened or endangered species in the project vicinity was completed by consultation with the New Mexico Department of Game and Fish (NMDGF). Results of the inquiry determined that no species were identified in the immediate area (see Attachment F for the Protected Species Habitat Assessment). Due to the historic nature of the sightings, lack of suitable habitat, and the significant fragmentation of the surrounding area it was determined these species could not be supported at the subject property and therefore will not be impacted. As proposed, the project will have No Effect on federally listed species. The property has a tree and other vegetation in the surroundings where migratory birds may nest; therefore, project activities which include vegetation removal should occur outside of the peak nesting period of March through August to avoid destruction of individuals or eggs. However, if land clearing activities must be conducted during this time, a survey for active nests should be conducted by a qualified biologist no more than 7-10 days prior to commencing work. As proposed, the project will have No Effect on federally listed species. The project is in compliance with the Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402. No further compliance activities are necessary. Attachment F -USFWS Critical Habitat Map, Protected Species Habitat Assessment, IPAC Report, Natural Heritage - Biota Information System New Mexico Species List.

Supporting documentation

[Wildlife MIH.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

✓ No

Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

✓ No

Based on the response, the review is in compliance with this section.

Yes

Screen Summary**Compliance Determination**

Locations of HUD-assisted projects involving new residents, an increase in residential density, or introduction of new explosive and flammable hazards must have acceptable separation distances (ASD) between residences and the stationary hazardous operations that store, handle, or process chemicals or petrochemicals of an explosive or flammable nature. The proposed project includes activities such as redevelopment of the retired Fire Station 3 with a Mobile Integrated Healthcare Station. The project would not increase residential density and use. Handling of hazardous flammable fuels or storage facilities would not occur and precludes the project from further evaluation under this section. The project is in compliance with Explosive and Flammable Hazards 24 CFR Part 51 Subpart C. No effects are anticipated, and no further compliance activities are necessary.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes

✓ No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

Project site already developed as Fire Station 3. It will be demolished and a new building constructed on site.

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary

Compliance Determination

The proposed project occurs on urban land developed with retired Fire Station 3 and associated paved parking lot. The project does not contain lands that are designated prime farmland or farmland of statewide importance (Attachment G). The project is in compliance with Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658. No further compliance activities are necessary.

Supporting documentation

[MIH Zoning.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance,

or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

(i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Describe:

✓ No

2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.

Yes

Describe:

✓ No

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

- ✓ CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

¹ Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood 'experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

² If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your [local environmental officer](#) with additional compliance questions.

³ Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at [24 CFR 55.2\(b\)\(12\)](#).

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

The project area is not within the Federal Flood Risk Management Standard (FFRMS). The FFRMS floodplain for the project area was defined using the 0.2-Percent Annual Chance Floodplain Approach based on the FEMA Flood Insurance Rate Maps (FIRMs) Panel Number 35013C1091G, effective on July 6, 2016. Climate Informed Science Approach (CISA) data was not available for this location. There are no critical actions within the 100 or 500-year floodplains (Attachment C). The project is in compliance with Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55. No further compliance activities are necessary.

Supporting documentation

[MIH FM35013C1091G\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

Threshold

Is Section 106 review required for your project?

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)

No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

- ✓ Yes, because the project includes activities with potential to cause effects (direct or indirect).

Step 1 – Initiate Consultation

Select all consulting parties below (check all that apply):

- ✓ State Historic Preservation Offer (SHPO) Completed

- ✓ Advisory Council on Historic Preservation Completed

- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

- ✓ Comanche Nation

Response Period Elapsed

- ✓ Fort Sill Apache Tribe

Response Period Elapsed

✓ Mescalero Apache Tribe	Response Period Elapsed
✓ Pueblo of Isleta	Response Period Elapsed
✓ White Mountain Apache Tribe	Completed
✓ Ysleta del Sur Pueblo	Response Period Elapsed

Other Consulting Parties

Describe the process of selecting consulting parties and initiating consultation here:

as prescribed by NM SHPO.

Document and upload all correspondence, notices and notes (including comments and objections received below).

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

Yes

No

Step 2 – Identify and Evaluate Historic Properties

1. Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:

940 N. Valley Dr.

In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
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Additional Notes:

2. Was a survey of historic buildings and/or archeological sites done as part of the

project?

Yes

✓ No

Step 3 –Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as per guidance on direct and indirect effects.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

No Historic Properties Affected

No Adverse Effect

✓ Adverse Effect

**Document reason for finding; upload the criteria with summary and justification.
Criteria of Adverse Effect 36 CFR 800.5.**

Building that is planned for demolition is over 50 years old and is eligible for inclusion in the national register under Criteria A and C.

Step 4 – Resolve Adverse Effects

Work with consulting parties to try to avoid, minimize or mitigate adverse effects. Refer to HUD Exchange guidance and 36 CFR 800.6 and 800.7.

Were the Adverse Effects resolved?

✓ Yes

Describe the resolution of Adverse Effects, including consultation efforts and

participation by the Advisory Council on Historic Preservation:

In the instance of MIH project and Fire Station No. 3, the City determined that it could not avoid or minimize impacts to the fire station; subsequently, a resolution to the process was sought by entering into a Memorandum of Agreement (MOA) with NMHPD to establish mitigation measures to compensate for the impact to the NRHP-eligible property, specifically the demolition of the fire station. Specific mitigation requirements are listed within the MOA and outlined in the "Mitigation Measures and Conditions" section. below.

**For
the**

project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

STIPULATIONS

The City shall ensure that the following measures are carried out:

A. Prior to demolition, the City will hold a "Celebration of Service" for Fire Station No.3, with appropriate elected officials and staff present, to reflect on the building's history and service to the City of Las Cruces. The celebration will be announced in a press release, to be published on line and sent to news outlets no later than two weeks prior to the celebration. An event listing for the celebration will also be published on the City's events calendar and on the City's Face book. The celebration will be covered by the City's communication office and will be livestreamed and shared on the City's YouTube channel.

B. The City shall complete a documentation report on Fire Station No.3. The report shall include:

- 1.tPhotographs of the exterior and interior, documenting all four elevations and significant interior spaces.
- 2.tCopies of existing architectural drawings.
- 3.tBrief history of the building.
- 4.tA draft of the documentation report shall be submitted to NM SHPO for review and comments by NM SHPO.
- 5.tOnce the final report has been submitted to NM SHPO and NM SHPO is satisfied with the report, then demolition may commence.

C. Fire Station No. 9's dedicated exhibit space will include a permanent display of Fire Station No. 3's history and service. A description of the building and information on its historic and architectural significance, accompanied by a historic photo, will be included in the display.

D. Fire Station No. 3's sister station, Fire Station No. 2, will be nominated to the City of Las Cruces Register of Cultural Properties. A nomination form will be completed according to the Las Cruces Municipal Code 35-

2(0)(2) by the City's historic preservation program, to be voted on by the Historic Preservation

Committee and City Council when nominations are brought before both bodies for approval and designation. The City's historic preservation specialist will work to move the nomination forward to a successful conclusion.

Based on the response, the review is in compliance with this section. Document and upload the signed Memorandum of Agreement (MOA) or Standard Mitigation Measures Agreement (SMMA) below.

No

Screen Summary

Compliance Determination

Based on Section 106 consultation the project will have an Adverse Effect on historic properties. With mitigation, as identified in the MOA or SMMA, the project will be in compliance with Section 106. Satisfactory implementation of the mitigation should be monitored.

Supporting documentation

[SHPO MOA Signed MIH Section 106 Agreement.pdf](#)

[Log 127534 - dona ana - las cruces - fire station 3 - hud - 2026-03-18 - letter + project documents.pdf](#)

[CLC_ACHP_MIH Project Correspondence Log_2026 \(002\).pdf](#)

[CLC_ACHP e106 form_2026.pdf](#)

[SHPO Response - fire station 3 - hud - 2025-09-18 - letter + documents.pdf](#)
[Cultural Docs.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Noise Abatement and Control

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B

1. What activities does your project involve? Check all that apply:

New construction for residential use

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

✓ None of the above

Screen Summary

Compliance Determination

The Mobile Integrated Healthcare Station project does not include residential use and is not subject to HUD noise assessment. All noise generated activities including the use of sirens will be conducted in accordance with City ordinances and guidelines. No further evaluation of compliance actions under HUD's noise regulation are required. The project is in compliance with Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

✓ No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

✓ No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

Screen Summary

Compliance Determination

According to the U.S. Environmental Protection Agency's (EPA) Source Water Protection, Sole Source Aquifer Protection Program, Las Cruces, Dona Ana County, has no sole source aquifers. The closest sole source aquifer is the Upper Santa Cruz &

Avra Basin SSA, approximately 230 miles west of the project area (Attachment I). Also, the project involves no activities affecting sole source aquifers as the facility would utilize municipal water. The project is in compliance with Sole Source Aquifers - Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149. No further compliance activities are necessary.

Supporting documentation

[ssa r6.pdf](#)

[NM Wild Senic Rio Grande New Mexico.pdf](#)

[MIH SSA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 requires avoiding to the extent possible the long and short term adverse impacts associated with the destruction or modification of wetlands, and avoiding actions that directly or indirectly support new construction in wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory must be used as a primary screening tool, but observed or known wetlands not delineated on NWI maps must also be evaluated.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in 24 CFR 55.10 and referenced in Executive Order 11990? The term "new construction" shall include grading, clearing, draining, dredging, channelizing, filling, diking, impounding, and related activities for any structure or facilities, including the siting of new manufactured housing units.

No

✓ Yes

2. Will the new construction activities directly impact an onsite wetland?

The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, prairie potholes, wet meadows, river overflows, mud flats, and natural ponds. This definition includes those wetland areas separated from their natural supply of water as a result of activities such as the construction of structural flood protection methods or solid fill roadbeds and activities such as mineral extraction and navigation improvements. This definition includes both wetlands subject to and those not subject to Section 404 of the Clean Water Act as well as constructed wetlands.

✓ No, an onsite wetland will not be directly impacted by new construction activities, as defined in 24 CFR 55.10.

Yes, there is an onsite wetland that will be directly impacted by new construction activities, as defined 24 CFR 55.10.

3. Will the proposed project indirectly affect wetlands by modifying the flow of stormwater, releasing pollutants, or otherwise changing conditions that contribute to wetlands viability?

Yes, wetlands may be indirectly affected by changing conditions that contribute to wetlands viability.

- ✓ No, wetlands will not be indirectly affected by changing conditions that contribute to wetlands viability.

4. Will the proposed project indirectly affect off-site wetlands?

Yes, off-site wetlands may be indirectly affected.

- ✓ No, off-site wetlands will not be indirectly affected by changing conditions that contribute to wetlands viability.

Screen Summary

Compliance Determination

Review of the National Wetlands Inventory map and confirmation of site conditions during the performance of the Phase I ESA shows no indication of wetlands on the site. Therefore, the project is in compliance with Wetlands Protection Executive Order 11990, particularly sections 2 and 5. No further compliance activities are necessary. See Attachment J, Wetland Protection, National Wetlands Inventory Map.

Supporting documentation

[MIH Wetlands.pdf](#)

Are formal compliance steps or mitigation required?

Yes

- ✓ No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

✓ No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

Compliance Determination

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[NM Wild Senic Rio Grande New Mexico\(1\).pdf](#)
[MIH Wild Scenic Rivers.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

