EMPOWERMENT CONGRESS

New Mexico Environmental Law Center™

# COMMUNITY EVALUATION & PUBLIC COMMENT

## *On the Comprehensive Performance Evaluation of the Camino Real Regional Utility Authority Four Arsenic Treatment Facilities*

*Photo credit: KFOX 14/CBS4*

*Based on the Comprehensive Performance Evaluation, Final Results and Report Prepared by the Eastern Research Group*

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The following is an evaluation and public comment by Empowerment Congress of Doña Ana County and the New Mexico Environmental Law Center ("NMELC") on the Eastern Research Group's ("ERG") Comprehensive Performance Evaluation ("CPE") of the Camino Real Regional Utility Authority ("CRRUA") conducted on May 28-30, 2024. ERG, the New Mexico Environment Department ("NMED"), and CRRUA released the Final Report, *Results of the Comprehensive Performance Evaluation of Camino Real Rural Utility Authority Four Arsenic Treatment Facilities*, on August 19, 2024.

*Photo credit: KVIA/ABC7*

ERG presented the Final Report to the CRRUA Board of Directors on August 19, 2024. Since the Report's release, CRRUA's primary actions and focus have been centered around only one of the fifteen recommendations included in the Report: the raising of residential utility rates. Because the ERG Report raises several other concerns and recommendations that are more imperative to the provision of consistently safe and clean drinking water to the public, Empowerment Congress and NMELC take this opportunity to highlight four (4) key findings from the Final Report CRRUA should address, as well as to provide additional recommendations for CRRUA.

## EXECUTIVE SUMMARY:

The Comprehensive Performance Evaluation conducted by ERG and the subsequent Final Report identified several issues within CRRUA's Arsenic Treatment Facilities, systems, processes, and policies. Below, Empowerment Congress and NMELC highlight the following four (4) key findings from the ERG Report, with additional context as to why each finding is significant to public health and integral to the provision of clean and safe public water:

(1) CRRUA equipment has failed, is broken, or is malfunctioning;

(2) CRRUA inadequately monitors and maintains its facilities;

(3) CRRUA lacks emergency response plans and procedures; and

(4) CRRUA staff lack technical knowledge and expertise.

Moreover, in response to these significant issues and failures with CRRUA's operations, systems, and ultimate provision of clean and safe public water to residents of Sunland Park and Santa Teresa, New Mexico, Empowerment Congress and NMELC provide the following recommendations for CRRUA to consider and implement:

(1) Prioritize CRRUA funds, grants, and expenses towards the maintenance and repair of its facilities;

(2) Create a maintenance procedure and schedule;

(3) Invest in proper and adequate monitoring systems, alarms, flow meters, flow controls, and generators at each Arsenic Treatment Facility;

(4) Mandatory, extensive, and recurrent training for CRRUA operators and staff; and

(5) Improve public notice procedures and practices, consistent with the federal Safe Drinking Water Act, 42 U.S.C. §300f *et seq.* (1974), and the New Mexico Open Meetings Act, NMSA 1978 §§ 10-15-1 to 10-15-4.

## ERG FINDINGS:

### 1. CRRUA Equipment Has Failed, is Broken, or is Malfunctioning.

The Final Report identified several equipment failures and malfunctions in its evaluation of CRRUA's four arsenic treatment facilities, which raise significant concerns surrounding the adequacy and efficacy of CRRUA's operations and ultimately, the quality of the public water supply. For example, the Report states the Santa Teresa Community Arsenic Treatment Facility has an unidentified number of broken chemical feed pumps in need of replacement. *See* Report at 15. These chemical feed pumps are necessary to remove arsenic from well water and ensure the water is safe for human use and consumption. Meanwhile, the Report also identifies an unknown "number" of wells[1] that are in need of repair or replacement. *See* Report at 15.

Additionally several of the filters and media at CRRUA's four Arsenic Treatment Facilities have, or are likely to have, exceeded their design life. Filters and media that are functioning past their design life inhibit and adversely impact the efficiency and quality of the water treatment process, further jeopardizing the quality of the public water supply. Below includes a table from the Final Report, in which such findings are highlighted.

**Table 1: Summary of Filtration Rates and Media Life for CRRUA ATFs.**

| Arsenic Treatment Facility | Flow | | Media | | |
|---|---|---|---|---|---|
| | Maximum Design* | Observed during Site Visit | Estimated Design Life | Estimated Remaining Life | Comments |
| Sunland Park | Maximum treatment plant design flow of 1,406 gpm, or 703 gpm per filter with a maximum loading rate of 6.7 gpm/ft$^2$. 25% bypass allowed. At maximum plant flow of 1,406 gpm, allowed bypass is 469 gpm. | 1,067gpm flowing to the plant (fed by Wells 19A (STWS) and 30A (STWS)). These two wells are not on SCADA and are manually operated. | Filters placed into service in 2011.Per O&M manual, design life of over 10 years estimated based on average flow rate and arsenic concentrations. | Media is near its useful life and documented loss of media through failed valve on filter vessel. | CRRUA is using reserves to fund replacement of media in 2024. |
| Industrial Park | Maximum treatment plant design flow of 2,500 gpm, or 833 gpm per filter with a maximum loading rate of 4.9 gpm/ft$^2$. No bypass exists at this plant given the high raw water arsenic concentrations (42 ppb). | 795 gpm flowing to the plant (fed by Well 6A (STIP)). Flow is manually controlled. | Filters placed into service in 2013. Could not find media design life information in O&M Manual or other documents provided. | Unknown; however, these filters treat a high arsenic concentration and could be approaching useful life. | CRRUA is using reserves to fund replacement of media in 2024. |
| Santa Teresa Community | Maximum treatment plant design flow of 2,430 gpm, or 810 gpm per filter, with maximum loading rate of 5 gpm/ft$^2$. 23% bypass allowed. At maximum plant flow of 2,430 gpm, allowed bypass is 720 gpm. | 886 gpm flowing to the plant (fed by Well 30A (STWS)), with 109 gpm bypass. Flows are manually controlled. | Filters placed into service in 2015.Could not find media design life information in O&M Manual or other documents provided. | Unknown. | Remaining media in the filter vessel unknown. |
| Border | Maximum treatment plant design flow of 800 gpm, or 400 gpm per filter, with maximum loading rate of 6.3 gpm/ft$^2$. 30% bypass allowed. At maximum plant flow of 800 gpm, allowed bypass rate is 350 gpm. | Well 3 (STBC) serving this plant and only provides approximately 500 gpm, below the maximum design flow. | Designed to treat a total of 92.6 million gallons before media requires replacement. Filters in service for approximately 4 months. | Media has approximately 3 years left before replacement is needed based on current flow records and demands. | Current use is approximately 2.0 million gallons per month. |

*Maximum flow and filter loading rates obtained from the O&M manuals provided by CRRUA.

[1] We further raise concerns surrounding the comprehensiveness and adequacy of ERG's evaluation and Final Report, considering ERG fails to provide a specific amount of chemical feed pumps and wells in need of repair or replacement. Based on the data and findings provided in the Final Report, it is unclear whether ERG adequately identified to CRRUA each chemical feed pump, well, and other equipment in need of repair or replacement.

## 2. CRRUA Inadequately Monitors and Maintains its Facilities.

All four Arsenic Treatment Facilities ("ATF") lack the necessary inline monitoring, data collection, and alarms to immediately notify operators of malfunctions and contaminations to the public water supply, further jeopardizing the public's health and safety. *See* Report at 15-16. Specifically, the Final Report states that the current CRRUA equipment, instrumentation, and procedures cause operators to not be timely notified if:

- "A chemical feed pump is offline or malfunctioning";
- "Chlorine residuals are outside of acceptable operating range";
- "pH values are outside of acceptable operating range"; and
- "Flow exceeds ATF rated capacity or allowed bypass flow percentage exceeded." *See id*.

The Final Report further emphasizes the lack of alarms at each Arsenic Treatment Facility in the table below:

**Table 2: Sunland Park, Industrial Park, and Santa Teresa Community ATF Chemical Feed Information**

| Chemical | Target Goal | Pumps | Control | Alarms | Comments |
|---|---|---|---|---|---|
| Gas Chlorine: Used to oxidize arsenic to improve arsenic removal and maintain free chlorine residual throughout distribution system. | Raw Water: 0.6 to 1.0 ppm free chlorine Filtered Water: 0.4 to 0.8 ppm free chlorine | Gas chlorine fed at each well; did not visit gas chlorine facilities during the CPE. | Manual grab samples taken and measured with field test kit at ATFs before filters and after filters. Feed rates are flow-paced based on flow from the well. | None | CRRUA plans to install inline chlorine analyzers and alarms as part of SCADA upgrades. Measured free chlorine residual values in finished water were not within range at Industrial Park ATF (0.29 ppm) and Santa Teresa Community ATF (0.32 ppm). |
| Sulfuric Acid: Used to reduce pH to improve arsenic removal. | Target pH of between 6.7 and 7 after sulfuric acid feed. | Two dosing pumps at each plant that alternate and shutdown if flow to plant is 0 gpm. | Pump feed is flow paced with ability to modify manually if pH is out of target range. pH is measured using both grab samples and inline pH probes. | None | Replaced pumps at Industrial Park ATF in 2023. Plan to replace pumps at Santa Teresa Community ATF. SCADA upgrades and additional inline pH probes are planned to better control chemical feed. Observed pH values from inline probes and grab samples indicate pH is within acceptable ranges. |
| Ferric Chloride: Used to coagulate arsenic into larger particles for removal through filtration. | Ferric chloride feed is adjusted if arsenic field test (taken Monday, Wednesday, and Friday) of filtered water indicates arsenic concentration above 10 ppb. | Two pumps at each plant that alternate. One pump out of service at Santa Teresa Community ATF. | Pumps are flow paced with ability to modify manually. | None | Replaced pumps at Industrial Park ATF in 2023. All finished water arsenic concentrations observed to be below 10 ppb using CRRUA field test kit. Recent arsenic samples sent to laboratory indicate arsenic concentrations in finished water below 10 ppb (see Appendix B). |
| Caustic Soda: Used to increase pH after filtration. | Try to maintain filtered water pH between 7.4 and 7.8. | Two pumps at each plant that alternate. One pump out of service at Santa Teresa Community ATF. | Inline pH probe is used to control caustic soda feed on/off to maintain pH. | None | Plan to replace pumps at Santa Teresa Community ATF. SCADA upgrades are planned to better control chemical feed. Observed pH values from inline probes and grab samples indicate pH is close to or within acceptable ranges. |

Furthermore, the Final Report identified that no flow meters, or flow controls, exist for each individual filter at each Arsenic Treatment Facility. *See id.* at 18. The purpose of flow meters are to accurately measure corrosive chemicals and compensate for pressure changes due to fluctuating chemical tank levels. Flow meters are essential in water treatment facilities because

they help ensure that the quality and condition of water is monitored throughout the treatment process. Meanwhile, flow controls regulate the flow of water from the water well to the rest of the facility and its systems. Flow controls are necessary to ensure safe operating conditions and can help improve the efficiency of the water treatment process and increase the water supply. Due to CRRUA's absence of flow meters and flow controls, the Final Report states "[i]t is unknown if flow is evenly distributed to each filter or how the flow to the plant is maintained below the maximum filter loading rates." *See id.* Without this necessary equipment, it is unclear whether and if the water quality and quantity is protected and adequately monitored throughout CRRUA's arsenic treatment process.

CRRUA's lack of monitoring extends beyond inadequate equipment and data collection, however, as the Final Report notes that "CRRUA operators do not inspect the filter media annually, including coring of filter media and measuring depth of media" – "activities [that] are critical to assess the media condition and identify when media is approaching its useful life or needs replacement." *See id.* at 17. Without the adequate and consistent monitoring of the filter media, filters at CRRUA's Arsenic Treatment Facilities may be broken, malfunctioning, or not performing up to standard and may remain in such conditions for extended periods of time – further jeopardizing the quality of the water used and consumed by the public.

### 3. CRRUA Lacks Emergency Response Plans and Procedures.

Alarmingly, despite CRRUA's long history of emergencies and contamination to the public water supply, placing public health and safety at risk, CRRUA continues to lack adequate, if any, emergency response plans, protocols, and procedures.

The Final Report states that CRRUA lacks written standard operating guidelines and procedures, as well as a preventative maintenance program. *See id.* at 16-18. This lack of formalized procedures and programs, the Final Report assessed, places staff in a "reactive mode to infrastructure needs," and has contributed to "staff making poor decisions or not properly addressing a problem at the ATFs" – specifically pointing to the consistent exceedance of the arsenic maximum contaminant levels to the public water supply in 2023, in violation of federal health standards and further placing public health and safety at risk. *See id.*

Furthermore, only one of CRRUA's four Arsenic Treatment Facilities is equipped with a generator – meaning that in the event of a power outage, the three Arsenic Treatment Facilities without generators (Sunland Park, Santa Teresa Community, and Industrial Park) must rely on their individual storage tanks. *See id.* at 19. While the Final Report does not provide the specific duration and the capacity of the storage tanks to provide the public with sufficient and safe amounts of public water, the Final Report does emphasize that "depending on the power outage duration, these storage tanks may not be able to keep the distribution pressurized and meet demands." *See id.* This further emphasizes CRRUA's inadequate preparation and capacity to

serve the public in the event of an emergency, which stands to leave communities vulnerable and without access to water in a notably arid region of the state.

4. **CRRUA Staff Lack Technical Knowledge and Expertise.**

CRRUA's lack of written and standardized procedures for their operations and management of the Arsenic Treatment Facilities is of critical importance especially because, as the Final Report notes, CRRUA operators and staff lack the knowledge and understanding necessary to adequately operate and maintain the Arsenic Treatment Facilities. *See id.* at 16, 19.

The Final Report highlights that "operators lack an understanding on how to operate the bypass or recycle systems, along with needed adjustments to chemical feed rates when bypass or recycling occurs." *See id.* at 16. This knowledge is necessary because bypassing requires diverting water around one or more treatment processes within the facility, which jeopardizes the safety of the public water supply if not done properly – especially when the arsenic contaminant levels from CRRUA water wells have been found to be as high as 42 parts per billion. *See* Report at 5. Under the federal Safe Drinking Water Act and EPA's implementing regulations, the federal health standard and maximum contaminant level for arsenic in public drinking water is 10 parts per billion. 40 C.F.R. § 141.61.

The Report also states that CRRUA operators were not knowledgeable, nor even aware, of the amount of allowed pH in the finished water sent to distribution, meaning CRRUA operators are not monitoring the pH levels in the public water supply. *See* Report at 19. Monitoring pH levels in the public water supply, especially before the finished water is sent for distribution to the public, is necessary to ensure the water is safe for human consumption and use, as low or high pH levels can be indicative of a chemical or heavy metal pollution in the public water supply.

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## COMMUNITY RECOMMENDATIONS:

Based on the above findings in the Final Report, Empowerment Congress and NMELC urge CRRUA to consider and implement the following recommendations:

1. **Prioritize CRRUA Funds, Grants, and Expenses Towards Maintenance and Repair of Facilities.**

At each Arsenic Treatment Facility, the equipment and materials necessary for effective operation and the provision of consistently clean and safe public water are missing, malfunctioning, broken, and in need of repair or replacement, including, but not limited to: chemical feed pumps; flow meters; flow controls; filters; various media; and alarm systems. To continue operations for the provision of water to the public, without ensuring these necessary

components are present, up to date, and fully operative, adversely impacts the quality of the public water supply and in turn, jeopardizes the health, safety, and welfare of residents and customers of CRRUA.

As a public utility, CRRUA may apply for and receive state and federal funding for the integral maintenance and repair needed at each Arsenic Treatment Facility. In fact, CRRUA has already received state and federal funding to invest in the operation and maintenance of its facilities. CRRUA may also seek funding support from local government bodies, the City of Sunland Park and Doña Ana County, that are responsible for ensuring CRRUA carries out its primary purpose and role: to provide consistently and reliably clean and safe public water to the communities of Sunland Park and Santa Teresa, New Mexico.

Instead of using and prioritizing such funds for purchasing new office buildings, combating negative press and media coverage, and increasing staff salaries into the six-figure range, NMELC and Empowerment Congress urge CRRUA to prioritize all existing funds, as well as seek and take advantage of any and all potential grant and funding opportunities available, for use in addressing the identified maintenance and operations issues with its four Arsenic Treatment Facilities. To place the financial burden on consumers to fund the necessary repairs, maintenance, and updates to CRRUA's facilities by raising residential water and wastewater rates is an inappropriate shifting of CRRUA's responsibility to ensure it provides clean and safe water to the communities it serves. As a public utility, CRRUA has ample access to, and has received, government funding to update and maintain its facilities, and all necessary equipment therein. NMELC and Empowerment Congress thus strongly encourage CRRUA to prioritize such funds for the maintenance, updates, and repairs of its Arsenic Treatment Facilities, so that CRRUA meets the public purpose it was created to serve.

**2. <u>Create a Maintenance Procedure and Schedule.</u>**

The Final Report also identifies a significant lack of data, recordkeeping, procedures and practices, and written policies surrounding the maintenance and monitoring of each Arsenic Treatment Facility. Consistent, standardized, and adequate maintenance and monitoring of CRRUA's equipment, systems, and facilities is integral to ensure the water CRRUA provides to the public is consistently and reliably safe for use and consumption. However, CRRUA lacks the necessary information surrounding the usage and life of several filters and media at each Arsenic Treatment Facility, indicating many of the filters and media necessary to the provision of safe and clean water may be out-of-date, malfunctioning, or nonoperative. Moreover, the large amount of broken chemical feed pumps and other equipment at each Arsenic Treatment Facility signifies a lack of monitoring and adequate maintenance of the Arsenic Treatment Facilities, its systems, and its equipment.

The maintenance of each Arsenic Treatment Facility and its equipment and systems is currently not guided by standardized procedures, schedules, or policies, leaving much of the

equipment unmonitored for an unknown period of time, as the Final Report notes "CRRUA operators do not inspect the filter media annually…". *See* Report at 17. This lack of scheduled monitoring and maintenance of equipment may in part be due to the fact that CRRUA operators and staff lack the knowledge and understanding necessary to adequately operate and maintain its Arsenic Treatment Facilities. *See id.* at 16, 19.

NMELC and Empowerment Congress recommend CRRUA create a standardized procedure and system for the consistent, timely, and adequate monitoring of all Arsenic Treatment Facilities, systems, and equipment therein, consistent with what is required to ensure the water supply meets all public health standards. Equipment should be monitored on a regular, scheduled basis, with documentation provided during each monitoring period. This includes the proper documentation of all filters, chemical feed pumps, media, and other equipment's design life and performance, so that such equipment can be timely repaired and replaced when necessary. Monitoring and maintenance practices should be completed by CRRUA operators and staff with the adequate and extensive technical expertise and training, so that issues and failures with Arsenic Treatment Facility equipment and systems are timely identified and remedied.

3. **Invest in Proper and Adequate Monitoring Systems, Alarms, Flow Meters, Flow Controls, and Generators at Each Arsenic Treatment Facility.**

All four Arsenic Treatment Facilities currently lack the proper equipment to ensure the public water supply quality is consistently safe for human use and consumption. None of the Arsenic Treatment Facilities have the necessary inline monitoring; data collection media and processes; flow meters; flow controls; or alarms to alert CRRUA operators and staff when equipment has failed and/or contamination to the public water supply has occurred. Moreover, only one Arsenic Treatment Facility currently has a generator it can rely upon in the event of an emergency or power outage. Thus, the majority of consumers served by CRRUA are without adequate protection and recourse in the event of an emergency or power outage, potentially leaving communities without access to public water.

CRRUA's primary role and responsibility is to provide consistently clean and safe public water to the communities of Sunland Park and Santa Teresa. In order to do so, as a public utility, CRRUA should have each Arsenic Treatment Facility outfitted with the equipment, controls, and systems necessary to ensure the public water quality is, and remains, safe and consistent with federal and state health standards. CRRUA should thus prioritize all current and available funding to install the necessary inline monitoring; data collection media and practices; flow meters; flow controls; alarms; and generators at each Arsenic Treatment Facility. As stated above, CRRUA has access to, and received, government funding to do so, and must prioritize the use of such funding for the improvement of its facilities' equipment and systems to ensure the consistent safety and quality of the public water supply.

**4. Mandatory Extensive Training for CRRUA Operators and Staff.**

The Final Report identified that CRRUA operators lack the adequate knowledge and training to adequately operate and maintain the four Arsenic Treatment Facilities and ultimately ensure the water served to the public meets federal and state health standards. CRRUA operators and staff lack the requisite understanding of how to operate the bypass and recycle systems, along with how to perform needed adjustments to chemical feed rates when bypass or recycling occurs; do not know how to address Arsenic Treatment Facility equipment failures and infrastructure needs; nor how to monitor the amount of allowed pH in the finished water sent to distribution. *See id.* at 16-19. It is alarming that CRRUA operators and staff do not know how to manage and operate the facilities, systems, and equipment they are employed to manage and operate. Moreover, that CRRUA operators "operators lack an understanding on how to operate the bypass or recycle systems, along with needed adjustments to chemical feed rates when bypass or recycling occurs," yet CRRUA's "Industrial Park Arsenic Treatment Plant, the Sunland Park Arsenic Treatment Plant, and the Santa Teresa Community Arsenic Treatment Plant were offline and intentionally bypassed for over a year allowing untreated water into the distribution system." *See id.* at 16; *see* NMED Amended Administrative Compliance Order and Assessment of Civil Penalty, ¶ 7 (March 1, 2024) (emphasis added).

NMELC and Empowerment Congress recommend CRRUA invest in and require mandatory extensive training for CRRUA operators and staff immediately on all aspects of the operations, monitoring, and maintenance of the Arsenic Treatment Facilities, its systems, and equipment. Upon completion of such training, CRRUA operators and staff should be tested to ensure their knowledge and understanding, with training completion and testing documented. Moreover, CRRUA operators and staff should be required to undergo mandatory annual training and testing on all aspects of the operations, monitoring, and maintenance of the Arsenic Treatment Facilities, its systems, and equipment. Finally, CRRUA operators and staff should be subject to random compliance testing to ensure CRRUA operators and staff are following, and remain knowledgeable of, all operational procedures and practices.

**5. Improve Public Notice Procedures and Practices.**

Finally, due to CRRUA's historic and ongoing pattern and practice of leaving consumers uninformed of contaminations to the public water supply; equipment and operation failures; and CRRUA's public meeting dates and times until the day of or day before, effectively limiting public access and participation; NMELC and Empowerment Congress recommend CRRUA improve and standardize its public notice procedures and practices.

Under the federal Safe Drinking Water Act and EPA's implementing regulations, the New Mexico Environment Improvement Act, and the New Mexico Drinking Water Regulations, within 24 hours of a known contamination to the public water supply, CRRUA must provide public notice to all residents and consumers. 40 C.F.R. § 141.202; NMSA 1978 § 74-1-12;

NMSA 1978 § 74-1-13; 20.7.10.100 NMAC; 0.7.10.400(E) NMAC; 20.7.10.600(C) NMAC. To increase accessibility and ensure all affected members of the public are timely informed of any and all risks to their health and safety, CRRUA should provide public notice of contaminations, within 24 hours of their discovery, on the following platforms and in the following locations, at minimum: customer emails; mail to home addresses; CRRUA website; social media platforms; public spaces in Sunland Park and Santa Teresa; local and mainstream media outlets; and any and all other locations and methods frequently used by residents. CRRUA should always provide these notices in at least both English and Spanish.

To keep the public informed and adequately provide the opportunity for public participation, NMELC and Empowerment Congress further urge CRRUA to create a meeting schedule and follow it, consistent with the requirements of the New Mexico Open Meetings Act, NMSA 1978 §§ 10-15-1 to 10-15-4. The New Mexico Open Meetings Act establishes New Mexico's public policy that "all persons are entitled to the greatest possible information regarding the affairs of government and the official acts of those officers and employees who represent them." NMSA 1978 § 10-15-1(A). The Act requires "[a]ll meetings of a quorum of members of any board, commission, administrative adjudicatory body or other policymaking body of any state agency or any agency or authority of any county, municipality, district or political subdivision, held for the purpose of formulating public policy, including the development of personnel policy, rules, regulations or ordinances, discussing public business or taking any action within the authority of or the delegated authority of any board, commission or other policymaking body are declared to be public meetings open to the public at all times." *Id.*(B). Further, the New Mexico Open Meetings Act requires such meetings to be held "only after reasonable notice to the public." *Id.*(D).

These meetings should be scheduled at least one month in advance, with no practices of canceling and rescheduling such meetings as "special meetings," unless emergency circumstances arise. Should emergency circumstances arise necessitating the canceling and rescheduling of a public meeting, CRRUA should communicate to the public the reason and emergency circumstances behind such cancellations. When public meetings are scheduled, at least one month in advance, CRRUA should provide the public with the time, date, location, links, and all other applicable information on the following platforms and in the following locations, at minimum: CRRUA website; social media platforms; public spaces in Sunland Park and Santa Teresa; local and mainstream media outlets; and any and all other locations and methods frequently used by residents. CRRUA should always provide these notices in at least both English and Spanish.