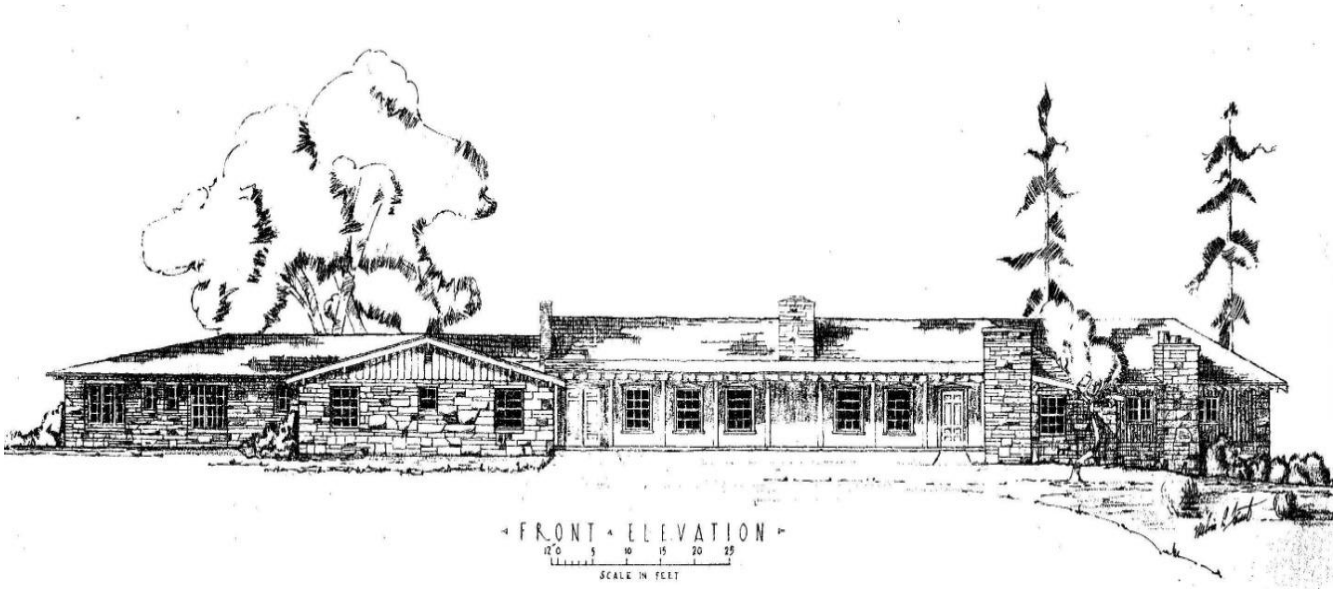
Environmental Assessment

Conchas Lodge Demolition and Mitigation Project

San Miguel County, New Mexico

EAXX-202-00-L4P-1754424225



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List of Acronyms Used

APE	Area of Potential Effect
CCC	Civilian Conservation Corps
EA	Environmental Assessment
EDA	Economic Development Administration
EDR	Environmental Data Resources, Inc.
ESA	Endangered Species Act
FCA	Flood Control Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FIS	Flood Insurance Study
HABS	Historic American Buildings Survey
HTRW	Hazardous, Toxic, and Radioactive Waste
MOA	Memorandum of Agreement
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NM	New Mexico
NMED	New Mexico Environment Department
NM EMNRD	New Mexico Energy, Minerals, and Natural Resources Department
NMDGF	New Mexico Department of Game and Fish
NMOSE	New Mexico Office of the State Engineer
NMSP	New Mexico State Parks
NMSPC	New Mexico State Parks Commission
NPS	National Park Service
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service

NRHP	National Registry of Historic Places
LERRD	Lands, Easements, Rights-of-way, Relocations, and Disposal Areas
PSDP	Prevention of Significant Deterioration Program (of the NMED)
PWA	Public Works Administration
SHPO	State Historic Preservation Office
SWPPP	Storm Water Pollution Prevention Plan
SWQB	Surface Water Quality Bureau
TCP	Traditional Cultural Property
THPO	Tribal Historic Preservation Office
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
WPA	Works Progress Administration

1. INTRODUCTION

The U.S. Army Corps of Engineers (USACE), Albuquerque District, Operations Division is planning to demolish the historic Conchas Lodge at the Conchas Dam and Lake Project, San Miguel County, New Mexico (NM) with mitigation of adverse effects. This Environmental Assessment (EA) has been prepared to evaluate environmental impacts of the project and solicit input from agencies and the public as required by the National Environmental Policy Act (NEPA) of 1969.

The historic Conchas Lodge was built in 1942 by the Civilian Conservation Corps (CCC) and has been managed by New Mexico State Parks (NMSP) and USACE. The Conchas Lodge closed in 2005 following the departure of the last remaining private concessionaire. Currently unoccupied and boarded up, the building is presently in a dilapidated condition and has suffered deferred maintenance, acts of vandalism, and biological infestation in addition to having asbestos containing materials, lead-based paint and lead containing materials. Section 110 of the National Historic Preservation Act (NHPA) obligates the USACE to manage the property "in a way that considers the preservation of [its] historic, archaeological, architectural, and cultural values." The Lodge remains a historic asset to the USACE and a significant piece of the New Deal legacy that brought economic relief and ambitious water management to this part of the state. The building's thoughtful design, fine sandstone masonry, and meticulous craftsmanship make an important architectural statement in this less populated region of New Mexico. For these reasons, a full exploration of all possible preservation alternatives was conducted, and a report was produced by the USACE Technical Center of Expertise – Preservation of Historic Structures and Buildings. USACE fully considered the preservation alternatives in that report and developed alternatives to partially preserve the building. However, USACE was not able to identify a cost-effective alternative to rehabilitate the Lodge, as analyzed in this EA. Therefore, USACE determined that the most effective way to preserve the history of the Lodge is to perform documentation and mitigation prior to demolition.

1.1. Conchas Dam and Lake

Conchas Dam was the 17th dam constructed by USACE. It was completed in 1939 at a cost of $15.8 million and has a primary purpose of flood control and secondary purpose of irrigation. Authorities and legislation pertaining to the dam and lake are listed in the Master Plan (USACE 2022). The dam is located in northeastern New Mexico, in the South Canadian River Canyon just downstream from the confluence of the South Canadian and Conchas Rivers, about 35 miles northwest of Tucumcari, NM.

Conchas Lake is a 25-mile-long reservoir behind Conchas Dam on the Canadian River. This lake features secluded coves, canyons, and sandy beaches, which are excellent for camping, boating, and fishing. Visitors can explore the 11 miles of the Conchas River or 14 miles of the South Canadian River arms of the lake. With miles of shoreline, there is ample opportunity for hiking and birding. Conchas Lake is a USACE-managed lake; however, most campgrounds and recreation areas are managed by NMSP as Conchas Lake State Park.

One of New Mexico's largest lakes, Conchas Lake is unique in that seaplane operations are permitted in the area south and west of Conchas Dam on the Conchas arm of the lake. During a normal rainfall year, as water is withdrawn for irrigation purposes in the summer and early fall months, the average pool available for public recreation is approximately 6,000 acres and is normally about a half mile to 2 miles wide. The lake's minimum elevation, the permanent pool, is 4,155 feet above mean sea level and stores 70,500 acre-feet, covering just 2,750 acres. At elevation 4,201.0 feet, the top of the irrigation pool, the water surface is 9,727 acres (USACE 2022). Conchas Lake provides 254,422 acre-feet of storage for conservation and irrigation, supplying water to the Arch Hurley Conservation District, the area of Tucumcari, and the Bell Ranch, located northeast of the lake. The reservoir has 199,467 acre-feet of storage space allocated for flood control purposes; the top of flood control storage elevation is 4,218 feet. USACE has flowage easements allowing for flood control operations up to elevation 4220 feet; however, natural inflows from large storm events could cause that level to be exceeded. The reservoir at maximum water surface elevation of 4,228.6 feet and 672,536 acre-feet of storage would cover 16,134 acres.

Recreation areas are leased to the State Parks Division of the New Mexico Energy, Minerals and Natural Resources Department and private operators, and have included campsites, restrooms/showers, a 9-hole golf course, marina, lodge and restaurant, unmanned airstrip, a convenience store/restaurant, gas station, bait shop, and boat launching ramps.

USACE operates and maintains day-use facilities with picnic sites, grills, a shelter, drinking water, restrooms and playground equipment. A Visitors Center is located at the USACE Conchas Lake Project Office in the administration building.

1.2. History of the Conchas Lodge

The idea of building a dam in San Miguel County, near the confluence of the Canadian and Conchas Rivers, had been discussed previously in 1931. Such a dam would provide both work and water for the people in an area that had been hit, first by the Depression, and then by the Dust Bowl. Despite this, the project was rejected due to its eleven-million-dollar price tag. Four years later the Emergency Relief Appropriation Act (ERAA) made the dam possible (Schelberg and Stone 2005).

Riding in on FDR's coattails in 1934, Governor Clyde Tingley, a New Deal democrat, was in full support of the dam. Tingley promised the federal government that the state would acquire the needed land without speaking to the legislature or the owners of Bell Ranch, where the dam would be located. A heated struggle followed, with lawsuits on both sides, and was only settled when Tingley spoke to President Roosevelt personally and received the president's backing. It was decided the federal government would purchase the land from Bell Ranch, and New Mexico would buy it in January of 1936 (Schelberg and Stone 2005:8.23-25).

Approved by the President on July 29, 1935, Conchas Dam was a Works Relief Program under the ERAA of 1935. Later it was included in the Flood Control Act of 1936, which besides flooding, also dealt in irrigation. The project was a conjoined effort of the Works Progress Administration (WPA) and the Public Works Administration (PWA), which worked on the dam, while the Civilian

Conservation Corps (CCC) was responsible for a small park and the Southside Recreation Area, (Schelberg and Stone 2005).

The location for the dam, however, was isolated, so an entire town had to be constructed to house workers. Construction began in mid-August 1935, with the production of adobe bricks, and was completed in the summer of the following year. It comprised eighty-nine buildings included a town hall, hospital, restaurants, gas station, other facilities, and, of course, homes for the workers and their families. Fifty of these buildings were made of adobe bricks, which totaled more than 700,000. Twenty-nine buildings were sandstone, because the building type had to change in the winter when it was too cold to make adobes. One building was a combination of the two, and there were six wooden buildings, and three metal warehouses. Once the dam was completed in 1939, most of the buildings were no longer needed (Schelberg and Stone 2005).

CCC Company 833 established the last State Park camp in New Mexico, SP-8-N at Conchas, fifty-nine miles northwest of Tucumcari on November 11, 1939, and remained until June 15, 1942 (Conchas Dam Recreational Area 1942). Along with government employees, the CCC dismantled the town, but the adobes were reused in the building of the Corps of Engineers' administration building, a gateway leading to it, and employee housing units (Schelberg and Stone 2005:7.10 and 7.12). In a document entitled *Work Accomplished under the supervision of the National Park Service between December 1, 1939, and June 30, 1941*, the projects performed are listed. These included demolishing buildings, planting trees, construction of the lodge building and temporary bath and supply houses, among other projects (Conchas Dam Recreational Area 1941).

After the reservoir began to fill, officials, including Captain Hans Kramer, USACE District Engineer at Conchas, began to realize the recreation potential for the reservoir. Eventually the details, with a few complications, were ironed out, and an agreement was made between the state, the USACE, and the National Park Service (NPS) and signed into law on May 1, 1940. The state would maintain Conchas Dam recreational area, which was owned by the USACE, and the NPS would construct the needed facilities (Van Citters and Dodge 2007).

Some idea of parkitecture (a style of architecture that developed through the NPS's efforts to create buildings that harmonized with the natural environment) was present in the state, even outside of the NPS. In 1934 the New Mexico State Planning Board was in favor of the Spanish-Pueblo Revival Style for New Deal public works. The board, along with architects John Gaw Meem, Willard C. Kruger, and James F. Zimmerman promoted the use of the style (Schelberg and Stone 2005). Instructions from the Corps of Engineers in the 1939 Specifications for Permanent Facilities stated:

> **The exterior plaster shall be…uneven and wavy…lacking in uniformity and mechanical workmanship…to harmonize with the Pueblo style of architecture. Generally the effects strived for are … by workmen using small trowels, no straight edges, and their eye for plumbing and leveling [Doty 1939:7.11].**

Those in charge realized the recreation area would not be supported by the revenue of the local population alone, and would have to draw tourists off the highway, and from cities such as Amarillo and Tucumcari (Van Citters and Dodge 2007). Conchas Lodge (Figure 1), located south of the reservoir, was constructed to give these visitors a place to stay.

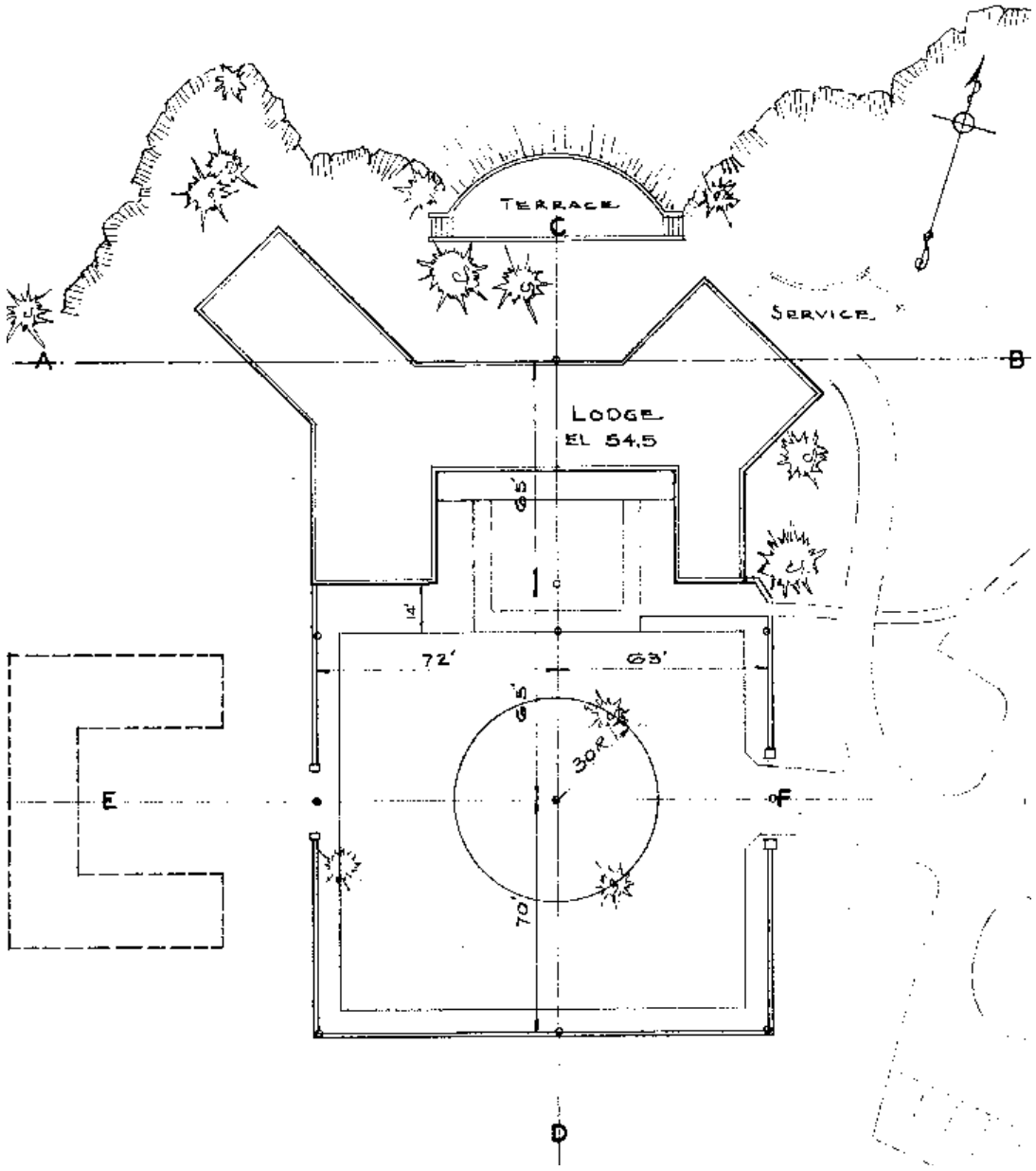

Figure 1. A plan of Conchas Dam Lodge (Conchas Dam Lodge Location Plan 1940).

The NPS was allowed to use the material removed from the dismantled city, and this was used in the construction of the Lodge. Unlike the USACE administration and housing buildings, the Lodge incorporated a combination of styles typical to the cultural history of the Southwest. The one-story building is primarily in the ranch style, with a low-pitched gable roof and asphalt shingles, a long front porch supported by 6 x 6 wooden columns, with a flagstone floor. The east wing diverges from this style due to its flat roof. The central room has a large ranch style chimney. Perhaps the ranch styling is a nod to the Bell Ranch, which sold the land so that the dam/reservoir could be constructed. The walls of the Lodge, on the other hand, were made of stacked tabular sandstone, with recessed mortar joints, suggestive of Pueblos. The Spanish-Pueblo Revival style was

represented by vigas, and the wooden door to the main entrance is framed by a lintel, as are the windows along the porch. One of the gabled ends of the building is filled with vertical wood boards, while the opposite end is stuccoed.

Completed in 1942 by the CCC, the Lodge has a central room that runs east to west, with wings protruding from each side. To the south the wings form 90-degree angles from the central section. These wings also extend to the north, but at 45-degree angles. The west wing included the residence for the Lodge manager, and rooms for rent. The east wing contained the kitchen and dining area and a gift shop (Van Citters and Dodge 2007).

The one-story building with gently pitched roofs featured walls of random ashlar sandstone (load bearing) and regularly spaced window openings with multi-lite wood frame sash windows. The caliber of masonry craftsmanship was high and consistent with much of the nation's body of New Deal era stone buildings. A major design feature was the portico/loggia supported by plain wood columns that ran the length of the front elevation. Native Pueblo-Mission influences were referenced in the cosmetic vigas that extend beneath soffits, and Spanish Territorial flavor was imparted by the molded triangular pediments found above the portico's window and door frames. Behind the portico, the great hall featured an open ceiling of hewn pole timber rafters and trusses, a system also used in the former restaurant space to the east. Great economy was shown not only in the recycling of stone for wall construction, but in the reuse of former telephone pole rafters that were fitted alongside newly-hewn rafters.

Though documentation is spare, a strong design attribution can be traced, not to one of the state's recognized New Deal architects, but to the Albuquerque District's pool of design engineers. What appears to be the original floor plan and architectural rendering of the front elevation was identified in the 1947 planning document, "Master Recreation Plan, Conchas Dam Project," signed, Melvin L. Faust (Figure 2, Figure 3) (Master Recreation Plan, Conchas Dam Project, Plate 10, 1947).

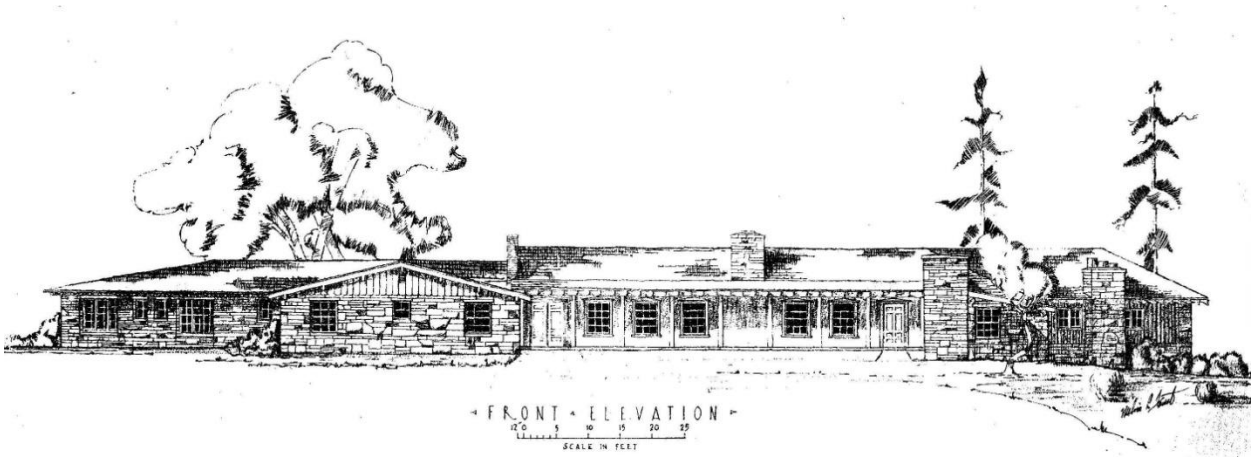

Figure 2. South elevation, original Lodge, as depicted in *Master Recreation Plan, Conchas Dam Project, Corps of Engineers, Albuquerque District, May 1947, Plate No. 10.* The drawing is signed, Melvin Faust.

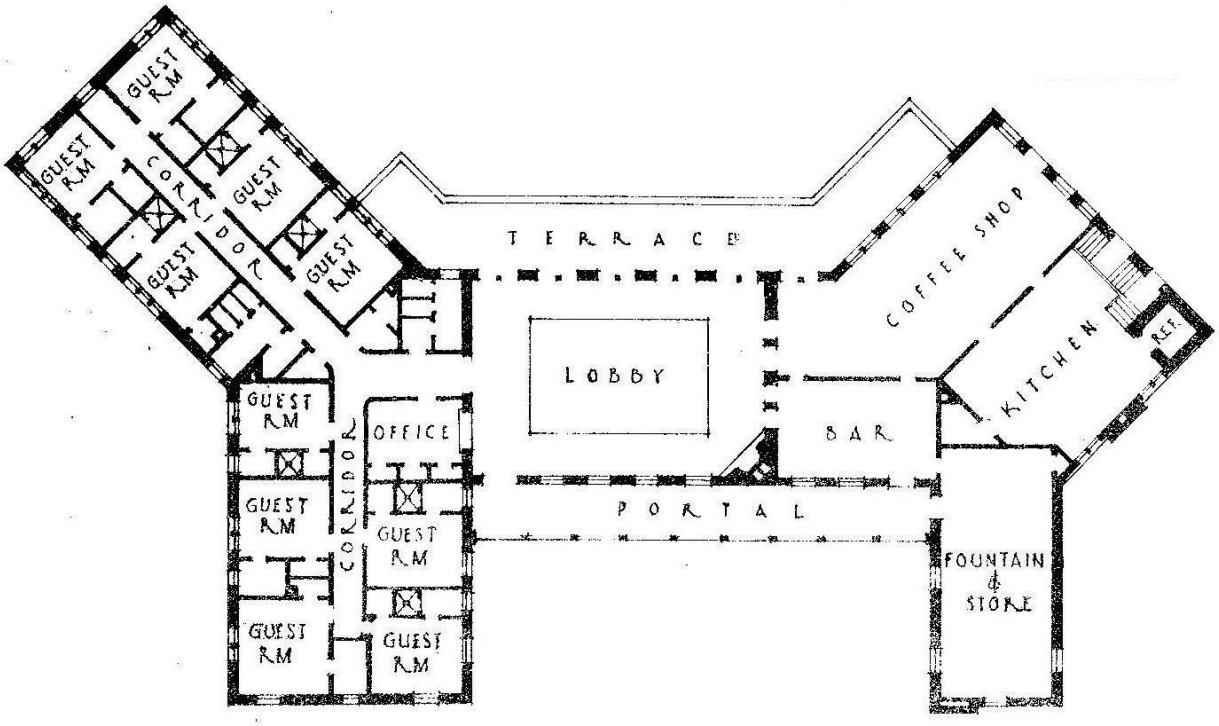

Figure 3. Original lodge floor plan, as depicted in Master Recreation Plan, Conchas Dam Project, Corps of Engineers, Albuquerque District, May 1947, Plate No. 10.

Upon completion of the Lodge and other projects in May of 1942, the CCC camp, which was located in the remaining structures of the dam construction camp, was dismantled, and the company reassigned to Socorro. The US had already entered WWII when the Lodge was finished, and the CCC was soon to be disbanded. The War, meanwhile, took its toll on Conchas. The cost of running the park the first year was $3,500, but despite 7,000 visitors, the net revenue was only $265. After the war, when restrictions were lifted, and the Depression a mere memory, Conchas Lake experienced growth, and new constructions were added (Van Citters and Dodge 2007).

1.3. Alteration and Expansion

Following completion of the Conchas Lake Lodge in 1942, additional recreational studies were commissioned as data poured in about the potential of a larger tourist market for the lake. In 1945, the National Park Service estimated the regional towns of Tucumcari, Clovis, and Amarillo, would comprise a visitor population of almost 10,000 ("History of the Conchas Dam and Reservoir Project, War Department," 1940; and "Design and Construction of Conchas Dam, 1941). The Corps' reporting in 1947 projected 5,000 visitors would recreate at Lake Conchas per year (Master Recreation Plan, Conchas Dam Project, page 16, 1947). To meet the expected demand, plans were soon formalized for additional facilities, to include boat docks, picnic areas, and campgrounds. Among the needs cited in the 1947 Master Recreation Plan prepared by the Albuquerque District was the intention to expand the west wing of Conchas Lodge, which was described as having been destroyed by a fire.

Two years later in 1949, a free-standing addition to the facility was erected diagonally and to the southwest of the main Lodge. The one-story rectangular structure with gabled roof became known as "Fisherman's Wharf," due to its frequent use by anglers. Though outwardly compatible with the lodge building in scale and mass, the Fisherman's Wharf building was of frame construction clad with stucco and lacked the masonry signature of the New Deal lodge building (Figure 4). While only seven years removed from the Lodge's completion; Fisherman's Wharf fell short of the architectural significance established in the Lodge and Adobe Belle, a set of dwellings constructed in the Pueblo Style originally meant to provide employee housing. The building has an incidental relationship to the recreational development around the lake and has lost its integrity of design, materials, and workmanship needed to convey an association with the historical events of the period.

Figure 4. "Fisherman's Wharf" was constructed in 1949 as an accessory lodging facility. The building lacks the sandstone masonry character of the original lodge building, but repeats the general scale, gable pitch, and continuous porch. ***(Photo: "Building Evaluations," prepared by the Albuquerque District, 2005)***

Around 1949, the fire-damaged, front facing gable of the original Lodge was reconstructed, and the gable's vertical siding, clad in stucco in the manner of the Wharf building. The gable today features simple two-by-four vigas, which are consistent with the treatment of the Wharf, but which contrast with the Lodge's round pole vigas. However, given that Faust's drawing depicts both round and squared vigas a mixture of both may have been intended.

From 1948 to 1960 additional improvements to the Lodge and South Recreation Area were made, including construction of a park manager's residence (demolished), as well as picnic and restroom facilities. Some of the later projects began to erode the Lodge's integrity. In 1959 the east end of the Lodge was extended slightly, to include an insensitive enclosure of the lake-side porch that concealed its design character. This resulted in a reconfiguration of the hipped roof into a gabled roof, and removal of the chimney and original window openings. Construction of the East Annex took place in 1959-60, resulting in a pair of one-story gabled frame buildings with stucco finish that converged to form a broad "V" along the shoreline bluff (Figure 5).

Figure 5. Two lodging buildings known as the East Annex were constructed in 1959 along the bluff as a pair of intersecting but separate gabled buildings. *(Photo: K. Hill, May 2012)*

The next formal planning for the Conchas Lake facilities occurred in 1965, with a study commissioned by New Mexico State Parks entitled, "Development Plan of Recreation Facilities for Conchas Lake and Ute Lake State Parks." This document treated all existing infrastructure, including campgrounds, boating facilities, as well as the Lodge as one study unit, with data on projected visitor patronage intended to support a number of new projects. Among the planned amenities were additional marinas, docks, launch areas, a store, café, and golf course.

The Lodge, at this time, part of Conchas Lake State Park, was to be enlarged from 24 guest rooms to 36 rooms offering first class accommodations. Although visitation figures for the Lodge were expected to grow modestly, the expansion doubled the size of the west end of the building. When completed in 1966, the extended west wing consumed the former hipped roof, which was re-designed to terminate as a gable in the manner of the earlier east end extension. The contemporary extension featured tabular sandstone veneer, although the craftsmanship was not of the same caliber as the original core building (Figure 6). The incompatible addition and enclosed cocktail lounge represented the last major compromise to the Lodge's original design.

Figure 6. Original sandstone walls to the left, and right side of the juncture crack. Note the heavier mortar joints and lesser craftsmanship of the veneered addition. ***(Photo: K. Hill, May 2012)***

Another component of the 1965 plan was the installation of a pool and bathhouse on the terrace just below the Lodge (Figure 7). Now demolished, the pool facility remains as a filled in open area with a concrete pad. Since the last alterations were made to the building, vacancy and vandalism have further marred original fabric and features, though Faust's elegant composition remains mostly intact.

Figure 7. Foundation remains of the bathhouse and former pool area on the terrace below the lakeside elevation of the lodge. This area has potential for redevelopment as an amphitheater or patio. Left of the staircase is the porch that was extended and enclosed in 1959. ***(Photo: K. Hill, May 2012)***

1.4. Current Status of Conchas Lodge

The Lodge has been closed and disused since the departure of its last concessionaire in 2005 and has experienced ongoing deterioration in the years since. Currently, Conchas Lodge is in dilapidated condition. The roof in the main hall has partially collapsed leading to years of exposure to the elements, water damage and animal infestation. The effects of abandonment and vandalism have become more apparent and public sentiment has grown, raising concern about the Corps' stewardship of Conchas Lodge.

If the situation is not addressed, the complex will continue to degrade, making the Lodge a danger and a liability. Because the Corps owns Conchas Lodge, it is obligated to protect public safety and manage the property in a manner that takes into consideration the complex's historic and architectural values pursuant to Section 110 of the NHPA.

1.5. Project Purpose and Need

Since the closure of Conchas Lodge in 2005, there has been much discussion as to the future of lodge building. During this time USACE, Albuquerque District explored several options for reuse of the building, up to the current study to determine the viability of partial demolition and partial renovation of the historic parts of the building. As time has passed during exploration of various options, the structure continued to deteriorate. Due to severe structural deterioration, presence of hazardous materials (lead and asbestos), and safety hazards, as well as the present significant increase in construction costs, the funding that would be required to partially renovate even the central part of the building far exceeds the Corps' preliminary estimates or any amount of funding that could be provided in the foreseeable future. Rather than continue to allow a deteriorating structure to sit on Conchas Lake Project land, USACE proposes to demolish the Lodge.

The current project objectives are to remove dilapidated and structurally unsound structures from the site, remove hazardous materials, and mitigate the loss of the historic structure. Mitigation would include documenting the Lodge and its significance to the community in accordance with Section 106 of the NHPA, as well as other tasks developed during consultation with the New Mexico State Historic Preservation Office (SHPO). Following demolition, the site would be restored to native vegetation.

1.6. Project Location

Conchas Lake is approximately 32 miles from Tucumcari via NM-104, 50 miles from Santa Rosa, NM, 76 miles from Las Vegas, NM, and 166 highway miles from Albuquerque, NM. The Conchas Lodge, where the proposed project would take place, lies on the south side of Conchas Lake, southwest of the dam and adjacent to the USACE-operated Southside boat launch, in the Southside Recreation Area (Figure 8). The Lodge lies north of the Conchas Subdivision, north-northwest of the golf course and air strip.

Existing development adjacent to the Lodge includes a boat launch with parking, the Southside Recreation Area Campground, a golf course, and a paved airstrip. The community of Hooverville, NM is located nearby to the south and southwest of the Lodge and is served by the Big Mesa Mutual Domestic Water Consumers Association.

1.7. Existing Recreation Facilities

Recreation development and improvement facilities on the south side of Conchas Lake include the Southside USACE campground and the Southside Recreation Area Boat Ramp. These currently existing facilities operate nearby to the Conchas Lodge. Additional recreation and improvement facilities within 5 miles of the Lodge include the NMSP/USACE Conchas Dam Project Visitor Center, the Adobe Belle Resort, and multiple campgrounds, recreation areas, and boat launch areas.

1.8. Authority

This Draft EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. § 4321 *et seq*.), and USACE Procedures for Implementing NEPA (33 CFR 230). The Assistant Secretary of the Army for Civil Works (ASA(CW)) has removed most of the sections from 33 CFR 230 and indicated that the Civil Works program will follow the DoD implementing procedures for NEPA issued on 30 June 2025. Actions that were ongoing as of the effective date of the new rule will continue to use the rule in place at the time the action was started. Therefore, this EA follows the USACE Procedures that were in place at the time the draft EA was prepared.

The Conchas Lodge study and demolition with mitigation project is being conducted consistent with USACE Operations and Maintenance authority for the Conchas Lake Project and the National Historic Preservation Act (54 USC 300101 et seq). Funding was provided by Congress in the Infrastructure Investment and Jobs Act (IIJA), 2023 (P.L. 117-58A) and IIJA, 2024 (P.L. 117-58B).

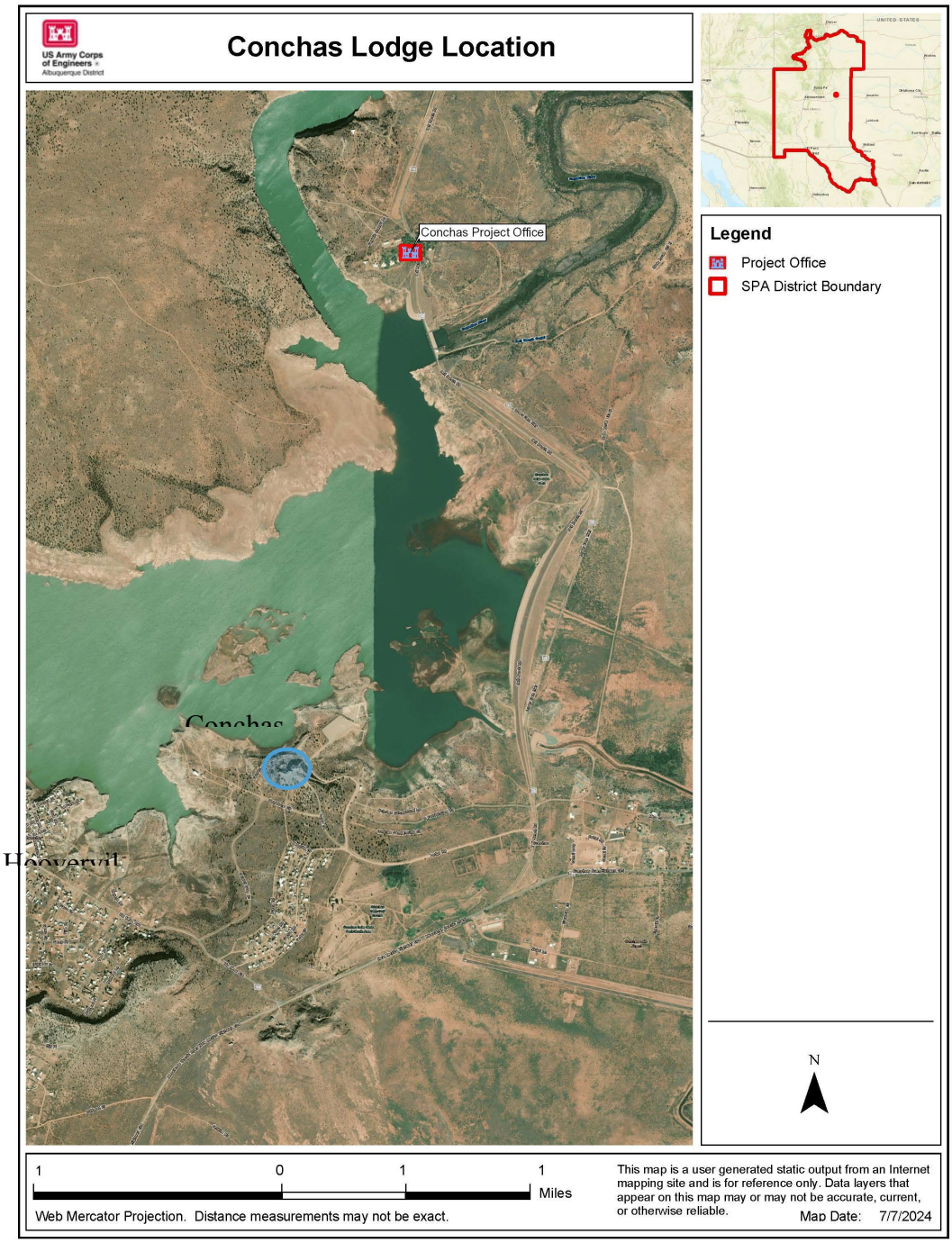

Figure 8: Conchas Lodge Project Location

1.9. Compliance with Applicable Laws and Policies

This Draft EA was prepared by the USACE, Albuquerque District, in compliance with all applicable federal statutes, regulations, and Executive Orders, as amended, including, but not limited to, the following:

- Americans with Disabilities Act (42 U.S.C. §§ 12101 *et seq.*)
- Archaeological Resources Protection Act (16 U.S.C. §§ 470aa - mm)
- Bald and Golden Eagle Protection Act (16 U.S.C. §§ 668-668d)
- Clean Air Act (42 U.S.C. §§ 7401 *et seq.*)
- Clean Water Act (33 U.S.C §§ 1251 *et seq.*)
- Endangered Species Act (16 U.S.C. §§ 1531-1544)
- Energy Independence and Security Act of 2007 (Pub. L. No. 110-140, Dec. 19, 2007, Section 438; 121 Stat. 1492, 1620)
- Farmland Protection Policy Act (7 U.S.C. §§ 4201 *et seq.*)
- Federal Noxious Weed Act (7 U.S.C. § 2814)
- Plant Protection Act of 2000 (7 U.S.C. §§ 7701 *et seq.*)
- Fish and Wildlife Coordination Act (16 U.S.C. §§ 661-666c)
- Migratory Bird Treaty Act (16 U.S.C. §§ 703-712; 50 CFR 10.13)
- National Environmental Policy Act (42 U.S.C. §§ 4321 *et seq.*)
- National Historic Preservation Act (54 U.S.C. §§ 300101 *et seq.*)
- Native American Graves Protection and Repatriation Act (25 U.S.C. §§ 3001-3013)
- Occupational Safety and Health Act of 1970 (29 U.S.C. §§ 651-678)
- U.S. Army Corps of Engineers' Procedures for Implementing NEPA (33 C.F.R. § 230; Engineer Reg. 200-2-2)
- Executive Order 11593, Protection and Enhancement of the Cultural Environment
- Executive Order 11988, Floodplain Management
- Executive Order 11990, Protection of Wetlands
- Executive Order 13112, Invasive Species
- Executive Order 13751, Safeguarding the Nation from the Impacts of Invasive Species
- Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds

2. ALTERNATIVES CONSIDERED

The USACE considered several alternatives during project planning, but only two alternatives are considered for full NEPA analysis: the No Action alternative and the Demolish All alternative (preferred alternative). The full range of alternatives considered included:

- No Action, which is used as the comparison basis. This alternative would perpetuate the ongoing deterioration and loss of the historic structure and would fail to address public safety. Any decision to continue management without maintenance would still require consultation with SHPO and resolution of those adverse effects per Section 106 of the NHPA.
- The "Demolish All" alternative would demolish all parts of the Lodge after consultation and mitigation under Section 110 of the National Historic Preservation Act. This alternative would be carried out in phases. The initial phase would consist of consultation and mitigation. Construction Phase 1 would entail removing and disposing of all vertical structure elements down to the concrete slab and terminating all utility connections; removing lead-based paints, asbestos containing materials; and properly disposing of hazardous materials off site. Construction Phase 2 would consist of removing and disposing of all foundations and concrete surfaces from the site, grading the land surface to restore native topography on all disturbed areas, and seeding all disturbed areas with a plant mix native to the region.
- The Original Lodge Facility Restoration Alternative would include restoring and rehabilitating the original historic portions of the lodge building while demolishing later additions and non-historic parts of the building. These different parts of the building are illustrated in Figure 9 and Figure 10. Consultation under Section 110 of the NHPA would address adverse effects to non-original parts of the Lodge. Originally proposed as the preferred course of action, this alternative was determined to be infeasible due to cost and structural issues with the building; therefore, this alternative is not carried forward for analysis.
- Rehabilitation of the non-historic portions of the Lodge, including Fisherman's Wharf and the East Annex. These alternatives were not carried forward for further consideration as these additions would not provide additional historical significance and would be an even more expensive undertaking than restoration of the historic portions of the lodge.
- Other alternatives that were considered but not analyzed included: 1- restoring the original lodge facility with additional recreation facilities and 2- stabilizing the building without restoring it. Financial limitations and USACE policy preclude adding recreation features at this time, and stabilizing the building would be costly, technically infeasible, and would not address safety concerns.

Figure 9. Aerial view of lodge. The original sections that were proposed to be repaired or restored under the "Original Lodge Facility Restoration" alternative include the Lobby & Restaurant and West Wing. However, USACE determined that restoration is not technically nor economically feasible.

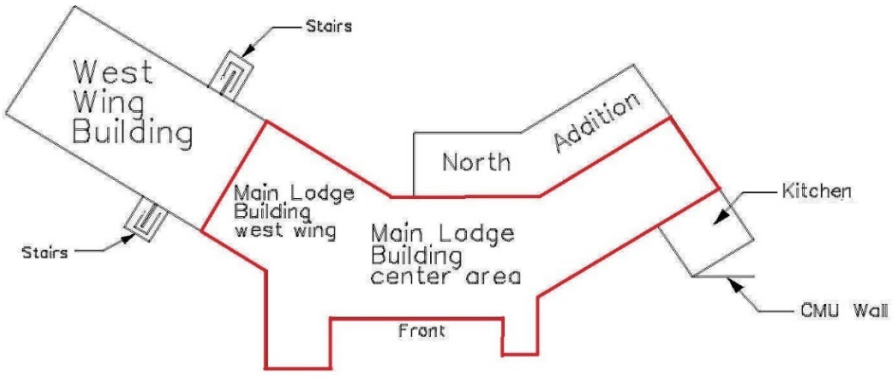

Figure 10: Footprint of the Conchas Lodge (above) with original portions outlined in red

2.1. No Action Alternative

A No Action Alternative is required pursuant to NEPA. The No Action Alternative considers the likely future conditions in the project area in the absence of the federal project. The No Action Alternative would do nothing to address the deteriorating structures, nor alleviate risks to public health and safety, nor the aesthetic values of the area. Under this alternative, there would be no changes to the existing dilapidated structures, including no asbestos and lead remediation, nor to the environment in and around the existing facilities.

If the No Action Alternative were to be selected, the Corps would still have responsibility to resolve the existing and future adverse effects stemming from that decision pursuant to Section 106 of the NHPA. This would involve negotiating a memorandum of agreement (MOA) with the New Mexico SHPO and involve consultation with the Advisory Council on Historic Preservation (ACHP) as well as the public. Potential mitigation measures might include documentation of the Lodge according to the Historic American Building Survey (HABS) standard, as well as actions to disseminate information about the Lodge and its history through public outreach, educational materials, interpretive displays, etc.

2.2. Demolish All (Preferred Alternative)

This alternative would consist of full demolition and removal of all existing structures and rehabilitation of the site to a natural area. This alternative would be carried out in phases. The initial phase would consist of consultation and mitigation. USACE has consulted with the State Historic Preservation Officer and interested parties and would document the historic structure by completing an Historic American Buildings Survey (HABS) Level 2 documentation of the original lodge building, and complete other mitigation as determined during consultation. Mitigation actions agreed to in the MOA include: USACE would conduct oral history interviews with members of the community to the extent feasible and assuming public willingness to participate. USACE would provide interpretive signage or educational information related to the history of the Lodge. For example, interpretive panels could be installed along the lakeside commemorating the Lodge, the New Deal era, CCC construction, and recreation history. Under the “Demolish All” alternative, some portions of the lodge building could be salvaged for re-use; for example, salvage of the corner fireplace and flue, and extended “wing walls” as seating benches, or salvage of stone and ceiling post beams for re-use as a picnic shelter.

Demolition Phase 1 would entail removing and disposing of all vertical structure elements down to the concrete slab and terminating all utility connections; removing lead-based paints, asbestos containing materials; and properly disposing of hazardous materials off site.

Demolition Phase 2 would consist of removing and disposing of all foundations and concrete surfaces from the site, grading the land surface to restore native topography on all disturbed areas, and seeding all disturbed areas with a plant mix native to the region.

3. AFFECTED ENVIRONMENT and FORESEEABLE EFFECTS

The alternatives that were evaluated were developed in response to the existing conditions within the project area. If the project is not implemented, some existing conditions may remain unchanged while others may deteriorate over time resulting in an increasing threat to public health, safety, and wellness. This chapter presents information on the existing physical and biological environment, along with socioeconomic and cultural conditions, and evaluates the foreseeable effects over time of rehabilitating, not rehabilitating, and demolishing the existing historic Conchas Lodge facilities.

3.1. Physical Environment

3.1.1. Built Environment

Existing Conditions

The original lodge building is a one-story side gabled building with a gabled wing angled toward the west; a restaurant and kitchen wing is angled toward the east; a former gift shop featuring a shed roof extends at the east side of the porch. Walls are double wythe, masonry bearing of tabular random sandstone. A porch supported by plain square wood columns runs the length of the front elevation, and features triangular pediments at window openings. Original six-over-six double hung sash windows are boarded over but intact on the south/front elevation. Eaves are accented with faux wood vigas; the east gable end features vertical wood boards with scalloped ends. The lake side originally featured a deep porch with multiple French double-door openings. This area is enclosed with tabular sandstone walls and plate glass windows. The primary interior space is an open hall with hard wood floor, located behind the front elevation. Its open ceiling consists of hewn wood pole beam trusses and rafters. An integrated sandstone fireplace is located on the interior of the central great hall and extends through the roof as a chimney. A two-story extension of the west wing consists of tabular sandstone veneer walls; replacement windows are contained in original openings with wood lintels. Two associated non-significant outbuildings are the frame and stucco Fisherman's Wharf, and concrete block East Annex. Original sandstone retaining walls outline the bluff below the Lodge's lake side.

As discussed above, the building is deteriorating and has suffered from some vandalism and biological infestation. Several site visits to the Lodge have ocurred during the course of this study and documented deteriorating conditions, with the most recent being 27 February 2024. Photos of the Lodge appear below (**Figure 11** through **Figure 17**).

Figure 11. Exterior view of the Lodge showing roof damage.

Figure 12. Exterior view of Lodge

Figure 13. Severe floor and ceiling damage within interior main room of Lodge

Figure 14. Interior damage including collapsed ceiling.

Figure 15. Exterior view of Lodge

Figure 16. Lodge setting, concrete patio and filled pool

Figure 17. Aerial view of Lodge

No Action Alternative

The No Action Alternative would not address the continued deterioration of the building and would have an adverse impact on the built environment. Mitigation measures as described above would be implemented.

Demolish All (preferred alternative)

The preferred alternative would demolish the lodge building, and would have an adverse effect on the built environment. Pursuant to Section 106 of the National Historic Preservation Act, Conchas Lodge is a historic property, and USACE has determined that it is eligible for the National Register of Historic Places. The Corps has determined that the proposed undertaking would have an adverse effect to historic properties. USACE is actively consulting with the NM State Historic Preservation Office (SHPO) and other consulting parties and is developing a MOA to resolve those adverse effects. Mitigation measures as described above would be implemented.

3.1.2. Climate

Existing Conditions

Climate in the Canadian River basin region in which Conchas Lake lies is described in detail in the 2022 Conchas Lake Master Plan (USACE 2022). Conchas Lake has a semiarid climate characterized by abundant sunshine, low relative humidity and fluctuating annual temperature

ranges. Summer temperatures are generally hot during the day and warm at night, while winter temperatures are generally cold, including freezing temperatures but rarely below 0 degrees on winter nights. The average high in July is 94°F and average low is 67°F, while the average high in January is 54 degrees Fahrenheit (°F) and average low is 25°F. Average annual precipitation is 16.12 inches, with the highest accumulation in June, July and August, during the monsoon season.

The Great Plains region is experiencing changing conditions in the form of rising temperatures and increased demand for water and energy which also has a negative impact on agricultural practices. Over the last few decades, the Great Plains region has experienced more frequent climate extremes of heat, drought, and precipitation. New Mexico is the sixth fastest warming state in the nation, with an average annual temperature increase of approximately 0.6°F per decade since 1970, equating to a 2.7°F increase over 45 years. This trend of rising temperatures and more frequent extreme climate events such as heat waves, drought, and heavy rainfall is predicted to continue (U.S. Global Change Research Program 2014), and will affect water and land usage throughout the region, including Conchas Lake.

No Action Alternative

The No Action Alternative would not affect, nor be affected by climate in the area.

Demolish All Alternative

The preferred alternative would not affect, nor be affected by climate in the area.

3.1.3. Geology and Soils

Existing Environment

The geology of the area is described in detail in the Conchas Lake Master Plan (USACE 2022). Conchas Lake is surrounded by sedimentary rock belonging to the Upper Triassic Chinle Group. The Chinle Group consists of layers of red-brown to maroon to gray mudstone, siltstone, and sandstone that were deposited in continental river and lake environments about 220 million years ago.

Five major soil types are mapped within the Conchas Lake Project boundary. The soil association found along the South Shore of Conchas Lake, where the lodge is located, is the Latom-Newkirk-Rock association. This is a fine sandy loam soil over calcareous sandstone bedrock (4 to 20 inches to lithic bedrock).

No Action Alternative

The geologic and soil conditions would continue unchanged from existing conditions.

Demolish All Alternative

The preferred alternative would have no effect on the area's geologic condition. There would be minor short-term disturbance to soils during demolition of the lodge building. Following construction, soils would be stabilized and revegetated with native species. There would be no long-term effect to soils.

3.1.4. Water Resources and Water Quality

Section 402 of the Clean Water Act regulates point-source discharges of pollutants into waters of the United States and specifies that stormwater discharges associated with construction activities shall be conducted under the National Pollution Discharge Elimination System (NPDES). Construction activities such as clearing, grading, and excavation subject the underlying soils to erosion by stormwater; when these activities result in disturbance to one or more acres of land, NPDES guidance requires preparation of a Stormwater Pollution Prevention Plan (SWPPP).

Section 404 of the Clean Water Act provides for the protection of waters of the United States from impacts associated with irresponsible or unregulated discharges of dredged or fill material in aquatic habitats, including wetlands as defined under Section 404(b)(1).

Section 401 of the Clean Water Act requires that Water Quality Certification be obtained for anticipated discharges associated with construction activities or other disturbance within waterways in the project area. Regulatory authority for the issuance of water quality certification resides with the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB).

Existing Environment

The NMED SWQB conducts water quality sampling to assess the quality of surface waters in the state, determine where water quality standards are not being met (i.e. where water quality is impaired), and to inform development of Total Maximum Daily Loads for impaired waters, which lay the foundation for restoring these waters. The SWQB conducted a water quality survey of the Canadian River from November 2014 to November 2016. Three sites in Conchas Lake and the irrigation canal outlet were sampled, and the following impairments were noted: mercury in fish tissue, nutrient/eutrophication biological indicators, and PCB in fish tissue. The Canadian River downstream of Conchas Dam was recorded as impaired due to *Escherichia coli* bacteria (SWQB 2017).

No Action Alternative

There would be no effects to or change in water quality. No discharge of dredged or fill material would occur; therefore, neither Section 404(b)(1) analysis, nor Section 401 Water Quality Certification would be required.

Demolish All Alternative

Under the Preferred Alternative, if an acre or more of land is disturbed, a SWPPP would be required in compliance with Section 402 NPDES permitting requirements. The lodge building is situated outside the flood pool of Conchas Lake and demolition of the historic lodge building would result in no effects to or change in water quality. No discharge of dredged or fill material would occur; therefore, neither Section 404(b)(1) analysis, nor Section 401 Water Quality Certification would be required.

3.1.5. **Floodplains and Wetlands**

Executive Order 11988 (Floodplain Management) provides Federal guidance for activities within the floodplains of inland and coastal waters. The order requires Federal agencies to take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by floodplains.

Executive Order 11990 (Protection of Wetlands) requires the avoidance, to the greatest extent possible, of both long and short-term impacts associated with the destruction, modification, or other disturbance of wetland habitats.

Existing Environment

The lodge building is situated outside the flood pool of Conchas Lake and there are no wetlands in the vicinity.

No Action Alternative

There would be no change or impacts to wetlands.

Demolish All Alternative

The project would not occur within a floodplain or wetland, so there would be no effect to floodplains or wetlands from either alternative.

3.1.6. **Air Quality, Noise and Aesthetics**

Existing Environment

Air Quality

The recommended plan area is located in the U.S. Environmental Protection Agency's (USEPA) designated Air Quality Control Region 8. This region is an attainment area for criteria pollutants, meaning that air quality standards are met within the region. The USEPA, through the Clean Air Act, regulates and sets standards for pollutant levels in the air. Primary National Ambient Air Quality Standards (NAAQS) are established for the sole purpose of protecting public health. NAAQS have been established for total suspended particulates smaller than 10 microns (PM_{10}), sulfur dioxides (SO_2), nitrogen oxides (NO_x), carbon monoxide (CO), ozone (O_3), and lead (Pb). The good air quality in the region is attributed to the low population and correspondingly low number of motor vehicles, and the absence of heavy industry discharging particulate matter into the atmosphere. Infrequently, high levels of total suspended particulates and CO occur in the proposed project area as a result of wind-blown dust and winter atmospheric inversions, which trap wood smoke and auto emissions in the lower layers of the atmosphere.

Regulations of the New Mexico Environmental Improvement Division's Prevention of Significant Deterioration Program (PSDP) allow air quality to deteriorate in small incremental amounts above existing levels of pollution in attainment areas throughout the state, which includes the majority of New Mexico. The PSDP divides state lands into three classes: Class I areas contain clean air and, therefore, only very small increases in air contaminant levels are permitted; Class II areas contain

moderately clean air and, therefore, only moderate increases of air contaminant levels are permitted; and Class III areas are areas of extensive growth with concomitant increases in air contaminant levels. New Mexico does not contain any Class III areas: Most areas in New Mexico, including the proposed project area, are designated as Class II.

Noise

The ear has the remarkable ability to handle an enormous range of sound levels. To express levels of sound meaningfully, a logarithmic scale is used, rather than a linear one. This scale is the decibel scale. Most noise levels are given in dBA, which are decibels adjusted to reflect the ear's response to different frequencies of sound (Center for Hearing and Communication 2024).

A typical quiet residential area has a noise level of 40 dBA; a residential area near heavy traffic has a noise level of 85 dBA, and heavy machinery has a noise level of 120 dBA. The Center for Hearing and Communication advises that noise levels above 85 dBA will harm hearing over time and noise levels above 140 dBA can damage hearing after just one exposure (Center for Hearing and Communication 2024).

The area around the Conchas Lodge and lake is relatively quiet, as typical for a natural area, and noise is limited to occasional vehicle traffic.

Aesthetics

The current state of disrepair of the Lodge is aesthetically displeasing and public comment during scoping has emphasized the community's disapproval of the building's current state.

No Action Alternative

Sound and air quality levels, and aesthetic condition under this alternative would not change. The deteriorating condition of the lodge building would contribute to worsening aesthetics in the Southside area of the lake.

Demolish All Alternative

The preferred alternative would result in temporary, localized impacts to air quality and noise. Air quality would decrease, and noise levels would increase during project work; this would be a direct result of equipment operation and dust. These effects would be temporary, relatively minor in nature, and would not have significant cumulative effects on air quality or sound levels.

To minimize air quality impacts, machinery would be required to be equipped with emissions controls; disturbed soils would be kept wetted and would be revegetated as soon as practicable; and materials stockpiles would be kept covered or wetted.

To minimize noise impacts on people recreating at the lake, project work would be limited to daytime hours.

3.1.7. **Hazardous, Toxic, and Radioactive Waste**

The USACE Regulation 1165-2-132, Hazardous, Toxic and Radioactive Waste (HTRW) Guidance for Civil Works Projects, provides guidance for the consideration of issues associated with HTRW which may be located within project boundaries or adjacent properties. This regulation outlines procedures to facilitate early identification and appropriate consideration of HTRW concerns in the reconnaissance, feasibility, preconstruction engineering and design, operations, maintenance, repair, replacement, and rehabilitation phases of a project. Specific goals include identification of level of detail for HTRW investigations and reporting for each phase of the project, promotion of early detection and response by the appropriate responsible parties, determination of viable options to avoid HTRW problems, and the establishment of a procedure for resolution of concerns, issues, or problems.

Existing Environment

A preliminary evaluation of existing conditions for HTRW was conducted by USACE to determine the presence and character of contamination, if any, on lands potentially associated with the project, and which may impact the area of potential effect. Hazardous Materials Surveys, to determine the presence and location of asbestos containing materials, lead based paint, and lead containing materials, were performed in 2006, 2014, 2015, and 2019. The results of these surveys found asbestos and lead to be present in various materials at interior and exterior locations at Conchas Lodge, West Addition, East Annex (East Lodge), and Fisherman's Wharf (Fisherman's Lodge). These materials must be completely abated in accordance with all federal, state, and local requirements prior to any construction, renovation, or demolition activity. All HTRW requirements will be included in the contractor specification package.

No Action Alternative

Under the No Action Alternative, the buildings would not be demolished, and there would be no immediate impact on any hazardous, regulated, or solid waste at the site. The buildings would not be demolished, and they would remain in abandoned status. Many of the buildings contain asbestos containing materials, lead based paint, and/or lead containing materials that will disintegrate and mobilize over time. The buildings will continue to deteriorate and eventually collapse during which time and afterwards these materials will impact air and soil quality locally and potentially impact surface waters and groundwater quality over a larger geographical area. At some future time, the collapsed buildings may require a more complicated cleanup at a higher cost to prevent further adverse environmental impact.

Demolish All Alternative

Hazardous, regulated, or solid waste would be generated under this alternative, creating a negligible, short-term impact. Hazardous and regulated materials including asbestos containing materials, lead based paint, and lead containing materials would be removed and disposed of in accordance with applicable federal, state, and local regulations during building demolition activities. Standard industry practices would be used to ensure that no environmental impact occurs during abatement of these materials. Minimization of solid waste disposal would be achieved

through recycling to the extent practical. There would be a long-term beneficial environmental impact under this alternative due to removal and safe disposal of the hazardous materials.

3.2. Biological Environment

This section describes the biological environment including ecological and vegetation communities, invasive species and noxious weeds, wildlife resources, and special status species,

3.2.1. Ecological Region and Vegetation Communities

Existing Environment

The project area is located within the Conchas/Pecos Plains of the Southwestern Tablelands ecoregion, a semiarid region with broad, rolling plains, tablelands, and piedmonts. Uplands surrounding Conchas Lake are dominated by shrubby grassland that provides habitat for game and non-game mammal species, migratory waterfowl, reptiles, amphibians, insects, and resident and migratory birds.

Site visits to the project area have taken place on numerous occasions. Vegetation observed included scattered native and non-native shrubs, grasses, and forbs (including yucca, rabbitbrush, Russian thistle, snakeweed, and galleta, dropseeds, and grama grass species). Trees around the Lodge include juniper, mesquite, Siberian elm and saltcedar. More detailed information on the ecological and vegetation communities in the project area is provided in the Conchas Lake Master Plan (USACE 2022).

No Action Alternative

Under this alternative, there would be no effect to vegetation communities as no vegetation would be removed.

Demolish All Alternative

The proposed project would take place in a previously disturbed area and would eliminate some associated localized vegetation. However, project work will take place entirely in upland areas that have been previously disturbed by the original construction and ongoing maintenance of the Lodge. Disturbance caused by the proposed action will be confined to the construction and staging areas. Vegetation clearing will only take place in the staging areas and in the area immediately surrounding the buildings. Therefore, the proposed action would not affect ecological resources of concern.

The following requirements and conditions will be included in all contracts for the proposed action to avoid or minimize impacts to vegetation:

- Demolition and construction activities will be limited to the designated or otherwise approved areas shown on the construction drawings for project footprint, staging and access, and borrow

use. Any changes in access routes, staging areas, disposal sites and other high use areas must be approved by the Albuquerque District Environmental Resources Section.

- All earthen areas disturbed during construction and not developed would be reseeded with a native grass and forb seed mix appropriate for the area.

3.2.2. Invasive Plant Species and Noxious Weeds

Existing Environment

As per the New Mexico Department of Agriculture's *New Mexico Noxious Weed List* (updated October 2016; Appendix C), three Class C noxious weed species, Russian thistle, Salt cedar and Siberian elm, have been observed in the project area during site visits. Class C weeds are considered to be widespread in New Mexico, and management decisions for these species should be determined at the local level based on feasibility of control and level of infestation.

No Action Alternative

Without construction, there would be no change in existing noxious weeds or invasive species populations. Salt cedar is being managed by the Conchas Lake Project as time and resources allow.

Demolish All Alternative

Because of the small project footprint, the project work would have minimal effects on invasive species and noxious weeds. As discussed in the Vegetation Communities section, any areas of bare ground resulting from construction would be reseeded with native species to help prevent Russian thistle from taking hold. Areas around the project footprint would be managed by Conchas Lake Project staff, such as by mowing and selectively removing weeds.

3.2.3. Wildlife

Existing Environment

Lists of wildlife species, waterfowl, and fish found in or around Conchas Lake is provided in the Master Plan (USACE 2022). Common mammal species include the following:

Table 1: Common Wildlife – Mammal Species at Conchas Lake

Common Name	Scientific Name
Badger	*Taxidea taxus*
Beaver	*Castor canadensis*
Black-tailed jackrabbit	*Lepus californicus*

Bobcat	*Lynx rufus*
Coyote	*Canis latrans*
Desert cottontail	*Sylvilagus audubonii*
Mule deer	*Odocoileus hemionus*
Mountain lion	*Puma concolor*
Muskrat	*Ondatra zibethicus pallidus*
Porcupine	*Erethizon dorsatum*
Pronghorn antelope	*Antilocapra americana americana*
Raccoon	*Procyon lotor*
Red fox	*Vulpes vulpes*
Swift fox	*Vulpes velox*

The Biota Information System of New Mexico (BISON-M) and the New Mexico Environmental Review Tool (NM-ERT) were consulted regarding state-listed threatened or endangered species and species of conservation concern with potential to occur in the project area. These reports are provided in Appendix A. While there are several species that could occur in the general area, project construction would be limited to the Lodge building and immediate surroundings including the staging area. Two potential wildlife concerns came to light during the review process: Burrowing owls and bats.

- Bats have been observed roosting inside the lodge building and could also roost under the eaves. At the date of writing, only a few individuals have been observed, and species have not yet been identified. The Pale Townsend's Big-Eared Bat (*Corynorhinus townsendii pallescens*) is listed in the NM-ERT report. Cave myotis have been observed in the dam.
- Burrowing owls inhabit burrows of prairie dogs or other small mammals but may also use culverts or manmade structures resembling burrows. These features could be present within the project footprint.

No Action Alternative

The absence of construction would result in no significant impact to wildlife.

Demolish All Alternative

The proposed demolition activity would take place within the previously disturbed footprint of the lodge buildings. Minimal short-term, very localized habitat disturbance is anticipated to result from the proposed project. No significant effects would occur to wildlife from the proposed project.

- Any vegetation clearing or removal necessary for this project should be conducted between September 15 and April 15. If there is a need for vegetation removal to be performed between April 15 and September 15 the work area must be surveyed for nesting birds by a qualified biologist. For any active nest found with eggs or nestlings, the area of the nest will be avoided.
- The project would not affect natural habitat for bat species, but surveys will be conducted to ensure that no bats are roosting in parts of the building that will be demolished. An initial assessment for bats will be conducted and USACE will consult with NMDGF and implement their recommendations, as feasible, to avoid and minimize impacts to bats.
- The project site will be surveyed for burrows, and any burrows, culverts or similar openings would be surveyed to determine occupancy prior to any construction equipment entering the site. Any occupied burrow would be avoided and NMDGF would be consulted to determine an appropriate course of action to avoid impact to burrowing owls.

3.2.4. Special Status Species

Three agencies have primary responsibility for protecting and conserving plant and animal species within the proposed project area. The USFWS, under authority of the Endangered Species Act of 1973 (16 U.S.C. 1531-1544) (ESA), as amended, has the responsibility for federally-listed species. NMDGF has the responsibility for state-listed wildlife species (Table 4). The New Mexico State Forestry Division (Energy, Minerals, and Natural Resources Department) (NM EMNRD) has the responsibility for state-listed plant species. Each agency maintains a continually updated list of species that are classified, or are candidates for classification, as protected based on their present status and potential threats to future survival and recruitment into viable breeding populations. These types of status rankings represent an expression of threat level to a given species survival as a whole and/or within local or discrete populations.

Existing Environment

Federal Endangered Species Act Species:

A total of four threatened or endangered species, or species proposed for listing appear on the USFWS species list for the area (Table 2). Only the species with potential to occur in the project area will be discussed here.

Table 2: USFWS Endangered Species Act Species

GROUP	NAME	STATUS	POTENTIAL OCCURRENCE/EFFECT
Birds	Southwestern Willow Flycatcher (*Empidonax traillii extimus)*	Endangered	No suitable habitat exists within the project area.
Insects	Monarch Butterfly (*Danaus plexippus*)	Proposed Threatened	Potential to occur in project area, especially during migration; project could provide habitat; discussed below.
Plants	Holy Ghost Ipomopsis (*Ipomopsis sancti-spiritus*)	Endangered	No suitable habitat exists within the project area.

Note: The Tricolored bat (*Perimyotis subflavus*), Mexican spotted owl *(Strix occidentalis lucida)* and Rio Grande Cutthroat Trout (*Oncorhynchus clarkii virginalis)* were included in the 2023 species list but are not in the updated (October 2025) species list.

Critical Habitats: there are no critical habitats within the project area.

Species accounts are provided in Appendix A for species with potential to occur in the project area. Only the Monarch Butterfly has potential to be present in the project area.

Monarch Butterfly (*Danaus plexippus*)

Proposed for listing as threatened.

With its iconic orange and black markings, the monarch butterfly is one of the most recognizable species in North America. Monarchs are particularly remarkable because they migrate each year, flying from as far as Canada and across the United States to congregate at a few forested overwintering sites in coastal California or the mountains of central Mexico, where thousands to millions of Monarchs cluster in the trees. For more than 20 years, communities and scientists have been tracking monarch populations with growing concern as the number of monarchs at overwintering sites has declined, prompting the U.S. Fish and Wildlife Service and other agencies and groups to identify threats to the monarch and take steps to conserve monarchs throughout their range.

Figure 18: Monarch butterfly (photo credit: USFWS)

The primary stressors affecting the two North American migratory populations are loss and degradation of habitat (from conversion of grasslands to agriculture, urban development, widespread use of herbicides, logging/thinning at overwintering sites in Mexico, unsuitable management of overwintering groves in California, and drought), continued exposure to insecticides, and effects of changing weather conditions.

No Action Alternative

Without project implementation, no significant short- or long-term effects to special status species are anticipated.

Demolish All Alternative

USACE has determined that there would be “no effect” from the project to species listed under the ESA. Although these species (Table 2) are known to exist in San Miguel County, only the candidate species, Monarch butterfly, could occur within the project area. The proposed action would not affect native vegetation or host plants; therefore, the Monarch would not be affected by demolition of the lodge building. The other species are not likely to occur within the project area as there is no suitable habitat for any of the listed species. Therefore, the proposed project would have no significant effect on special status species.

USACE has the opportunity to provide nectar and larval host plants (milkweeds) for the Monarch when the area is eventually reseeded/revegetated, and therefore the project may have a minor beneficial effect to the Monarch.

3.3. Cultural Resources

Section 106 of the National Historic Preservation Act [54 U.S.C. § 300101 et seq.] (NHPA) and its implementing regulations, 36 CFR Part 800, require Federal agencies to consider the effects of their undertakings (e.g., projects or permits) on historic properties. Historic properties are legally considered to be those properties (cultural resources) eligible for listing on the National Register of Historic Places (NRHP).

To be eligible for listing, a property must have "the quality of significance in American history, architecture, archeology, engineering, and culture" that can be "present in districts, sites, buildings, structures, and objects" and which must "possess integrity of location, design, setting, materials, workmanship, feeling, and association" and meet at least one of a set of four criteria relating to association with historical events, historically significant people, distinctive characteristics of a period or style, and/or are likely to yield information important to prehistory or history. There are many examples of historic properties, including archaeological sites, historic buildings, Traditional Cultural Properties (TCPs), and historic districts.

To comply with Section 106 of the NHPA, Federal agencies must consult on the effects of their undertakings on historic properties with the State Historic Preservation Officer (SHPO), or in the case of undertakings on tribal lands of Tribes that have assumes the role of the SHPO pursuant to Section 101 of the NHPA, with the Tribal Historic Preservation Officer (THPO) of that Tribe.

Eligibility and Consultation

Conchas Lake has National Register merit including the dam, and paintings by Hungarian born, Works Progress Administration (WPA) artist Odon Hullenkremer (Schelberg and Stone 2005).

In 2007, Karen Van Citters and William A. Dodge recommended the Lodge for National Register eligibility based on Criteria A and C. It is seen to represent the state’s development in tourism facilities, as well the agreement between federal and state agencies that made it possible. The west wing of the building was not considered eligible because it was added later and had not yet met the fifty-year stipulation. The authors of the National Register application for the Lodge recommended reevaluating it in 2016, when it would be old enough. Despite additions and the multiple architectural styles of the Lodge, it represents the Southwestern identity, particularly in the traditional Territorial and Spanish-Pueblo Revival aspects. These stylistic themes along with modern conveniences were designed to attract tourism to this part of the state and played a part in the growth of New Mexico’s historic tourism development (Van Citters and Dodge 2007).

In a letter to SHPO dated August 17, 2023, the Corps determined that there would be an adverse effect to historic properties for planned stabilization, renovation, and partial demolition of the Conchas Lodge complex. The Corps has previously consulted on NRHP eligibility status for the Lodge and associated buildings (including e.g. HPD Logs 084466, 102059, 104242, 105107). During these communications it was agreed that the original portions of the Main Lodge (Figure 19) were eligible under criteria A and C. During earlier consultation, the Corps determined that other components including the West Addition to the Lodge, Fisherman's Wharf, and the East Annex, were not eligible or contributing elements due to their expedient nature, inconsistency with the Lodge's design and craftsmanship, and their post-dating of what the Corps considered the Lodge's period of significance (see especially HPD Logs 84466, 105107). In SHPO's 2017 response, they did not concur with these determinations, arguing that these other components with the Main Lodge comprise a historic district representative of the development of tourism facilities for the area. In this 2023 letter to SHPO the Corps stated its goal of stabilizing the existing structure of the eastern portion of the Main Lodge, while demolishing the Lodge's West Wing and West Addition, as well as the Fisherman's Wharf. The demolition would be to ensure safety and to bring the facility to a scale that would be maintainable in the future. It also stated that while the West Wing is part of the original Lodge structure; that the Corps had determined the foundation to be unstable and repair and renovation would not be feasible. The letter sought SHPO's concurrence on memorandum of agreement to resolve adverse effects and was also open to considering other components of the Lodge complex as eligible.

On August 31, 2023, SHPO responded that they concurred with the plan to write a MOA to resolve the adverse effect. USACE notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect, and the ACHP elected not to participate in consultation or development of the MOA to resolve adverse effects.

On May 30, 2023, the Corps held an online public meeting to present and discuss plans for partial renovation and partial demolition of portions of the Lodge complex. Public responses were generally positive, with particular support for saving and reusing as much of the Lodge as possible.

Subsequent analysis determined that renovation of any part of the Lodge was not feasible due to cost, stability, and safety issues, and USACE made the decision to consider demolition of the entire complex. USACE then notified SHPO and ACHP of the change in course of action leading to full demolition, determining again that such a course would result in a substantial adverse effect to this historic property. SHPO concurred with this determination and agreed that continuing development of the MOA was the appropriate course of action to resolve adverse effects. ACHP requested additional information from USACE to reevaluate their earlier decision not to participate. After receipt of this information, ACHP once again notified USACE that they would not participate in resolution of adverse effects. A second public meeting was held virtually on 11 December 2024 to inform the public of the results of USACE's analysis and the selection of the demolition alternative, and to request comment and participation in potential mitigation efforts. In addition, consultation

letters were sent to Tribes with interests in the area. No Tribal concerns were communicated to USACE during consultation.

The MOA was finalized on 18 SEP 2025 and contains the following proposed measures to mitigate the adverse effects resulting from demolition of the Lodge complex:

- Preparation of historic documentation of the Conchas Lodge complex meeting the standards of the Historic American Buildings Survey (HABS) Level II, which would include a narrative report, copies of select existing drawings, copies of historic photographs, and large-format photographs of exterior and interior views of buildings within the complex;
- Preparation of oral history interviews with members of the community, to the extent such interviews are feasible and community members are interested in and willing to participate;
- Development of an interpretive display explaining the history of the Conchas Lodge complex, which may be located at the visitor center or some other appropriate location for public viewing.

Section 106 consultation correspondence and the MOA between USACE and NM SHPO are included in Appendix B – Cultural Resources.

Figure 19: Aerial View of a recommended National Register boundary to include the significant and original section of the Conchas Lodge (minus the 1959 west wing addition) and original view sheds.

3.4. Socioeconomic Environment and Land Use

3.4.1. Socioeconomics

Existing Environment

For this analysis the five-county area surrounding Conchas Lake (San Miguel, Mora, Guadalupe, Quay and Harding Counties) is considered as the area of interest that would be immediately affected by the proposed project. People from the surrounding counties can most readily travel to Conchas Lake for recreation although people do travel from farther away to visit the lake. These counties are mostly rural communities with small populations, although there are small cities within the area (Tucumcari). These counties have experienced a small loss of population (ranging from -0.2% to -4.1% loss) since 2020 (U.S. Census Bureau 2023).

Table 3: Population of counties surrounding Conchas Lake

Geographical Area	2020 Population Estimate Base	2022 Population Estimate	Population Change (April 1, 2020 to July 1, 2022)
New Mexico	2,117,525	2,113,476	-0.2%
Guadalupe	4,451	4,310	-3.2%
Harding	655	628	-4.1%
Mora	4,185	4,169	-0.4%
Quay	8,744	8,546	-2.3%
San Miguel	27,203	26,953	-0.9%
Zone of Interest Total	45,238	44,606	

Table 4: Socioeconomic indicators for counties surrounding Conchas Lake.

Geographical Area	Median household income, 2018-2022	Percent of persons age 5+ not speaking English at home	Persons 65 years and over, percent	Persons in poverty, percent
New Mexico	$58,722	32.6%	19.1%	17.6%
Guadalupe	$38,713	49.8%	20.6%	23.8%
Harding	$39,489	27.5%	41.4%	16.6%
Mora	$40,231	53.8%	30.7%	21.0%
Quay	$38,998	19.5%	26.7%	23.6%
San Miguel	$43,490	52.6%	24.8%	23.4%

Source: U.S. Census Bureau, 2023 QuickFacts, Quay, Mora, Harding, Guadalupe, and San Miguel Counties, New Mexico. Census.gov/quickfacts/

Other socioeconomic and demographic characteristics of the area within the area of interest are varied and it is important to avoid over-generalizing. The median household income within these counties is lower than the state of NM median, and the percent of people in poverty is higher except for Harding County. The percent of people speaking a language other than English at home is higher in Guadalupe, Mora, and San Miguel Counties compared to the state of NM, but lower in Harding and Quay counties. The percent of each county's population over age 65 compared to the state's ranges from only slightly higher in Guadalupe County to double in Harding County (

Table 4). Additional socioeconomic data is provided in the Conchas Lake Master Plan (USACE 2022).

No Action Alternative

Under the No Action Alternative, the buildings would not be demolished, and there would be no direct effects to these population characteristics in the area of interest. However, the deterioration of the Lodge could be one of many contributing factors to a general lack of opportunity in the area and the underserved nature of the population.

Demolish All Alternative

The demolition of the lodge would not directly affect population characteristics in the area of interest. However, it could be one of many contributing factors to a general lack of opportunity in the area and the underserved nature of the population.

3.4.2. Land Use

Existing Environment

Land use at Conchas Lake is detailed in the Master Plan (USACE, 2022). The land classification surrounding the Conchas Lodge is high-density recreation.

No Action Alternative

The no-action alternative would not result in any change in land use. The Lodge was designated as non-operational at the time the Master Plan was written, and the immediate area surrounding the lodge was classified as an environmentally sensitive area due to its historical significance. Leaving the building in its current state and mitigating for the adverse impact would not change the land use classification.

Demolish All Alternative

The proposed demolition of the lodge would not change any land use designations per the Master Plan (USACE 2022). Areas designated as High-Density Recreation in the Master Plan would not be affected by the demolition, and the area where the Lodge stood would retain its Environmentally Sensitive classification. There would be no other effects or changes to land use.

Table 5: Alternatives Comparison.

Alternative / Resource Assessed	No Action		Proposed Action	
	Short-term	Long-term	Short-term (construction)	Long-term
Aesthetics	Adverse effect	Adverse effect	Minor adverse effect	Beneficial effect
Air quality	No effect	No effect	Minor adverse effect	No effect
Aquatic resources: floodplains, wetlands, hydrology, water quality	No effect	No effect	No effect	No effect
Noxious weeds and invasive species	No effect	No effect	No effect	No effect
Fish and wildlife habitat	No effect	No effect	No effect	No effect
Vegetation	No effect	No effect	Minor adverse effect	Minor beneficial effect
Threatened/Endangered species/ critical habitat	No effect	No effect	No effect	No effect
Historic properties	Adverse effect	Adverse effect	Adverse effect	Minor adverse effect with mitigation
Tribal trust resources	No effect	No effect	No effect	No effect
Hazardous, toxic & radioactive waste	No effect	No effect	Minor beneficial effect	Minor beneficial effect
Land Use	No effect	No effect	No effect	No effect
Noise	No effect	No effect	Minor adverse effect	No effect
Socioeconomics	No effect	No effect	No effect	No effect
Soils	No effect	No effect	Minor adverse effect	No effect

4. CONCLUSIONS

The USACE proposes to demolish the historic Conchas Lodge with mitigation of adverse effects. Consultation with the New Mexico SHPO is ongoing, and a Memorandum of Agreement is being written to resolve the adverse effect to the historic building.

5. PREPARATION, CONSULTATION and COORDINATION

5.1. Preparation

This Draft EA was prepared by USACE. Personnel primarily responsible for preparation include:

- Summer Schulz Biologist
- Dana Price Biologist, Public Involvement Specialist
- Jonathan Van Hoose Archaeologist
- Katie Hill Archaeologist
- Chris Parrish Archaeologist
- Ellis Ho Civil Engineer (Structural)
- Keith Winemiller, P.E. Environmental Engineering, HTRW
- Richard Dourte Civil Engineer
- Monika Sanchez Project Manager
- Emily Irwin Project Manager

5.2. Quality Control

This Draft EA has been reviewed for quality control purposes. Reviewers include:

- Stephanie Jentsch Biologist
- Jessica Gisler Archaeologist
- Danielle Galloway Supervisory Biologist
- Reid Reilly Planner

5.3. Consultation and Coordination

Agencies and entities that were contacted formally or informally in preparation of this Draft EA are listed in full in Appendix C and include:

U.S. Fish and Wildlife Service

New Mexico Department of Game and Fish

State Parks Division of the New Mexico Energy, Minerals and Natural Resources Department (New Mexico State Parks)

County Manager, San Miguel County

County Manager, Quay County

County Manager, Guadalupe County

Las Vegas / San Miguel County Chamber of Commerce

Tucumcari / Quay County Chamber of Commerce

Friends of Conchas Lake State Park

Private citizens

5.4. Public Involvement under NEPA

Coordination with the public and interested parties has taken place throughout the development of the project. See Appendix C for public involvement, scoping, and agency coordination.

The public was provided a 32-day review period of this Draft EA from June 6 until July 7, 2025.

The New Mexico Department of Game and Fish (NMDGF) submitted recommendations via the NM Environmental Review Tool (NM-ERT) and email. USACE obtained an initial NM-ERT report and recommendations in December 2023 during project scoping. NMDGF updated the report when providing comments on the draft EA, but noted the recommendations were unchanged. NMDGF recommended conducting pre-demolition surveys for any roosting bats that might be using the structure; conducting a preliminary burrowing owl survey; surveying for prairie dog colonies; and avoiding removing riparian vegetation. USACE takes note of these recommendations and plans to survey the building for bats.

The State Parks Division of the New Mexico Energy, Minerals and Natural Resources Department (New Mexico State Parks, NMSP) provided editorial comments requesting a correction to the name of the Department and a correction to the map in Appendix A that incorrectly shows the Southside Recreation Area is being administered by NMSP. These edits have been made to the Final EA.

A detailed comment letter was received from a resident of the local community. The letter included historic information about the development of the community and the 'glory days' of the Lodge. Substantive points raised in the letter included:

- The lodge is a beautiful building deserving of restoration and Historic Monument status.
- The lodge has historic, cultural, and emotional significance to the community.
- Instead of tearing it down, sell the lodge to an enterprising individual. The ongoing deterioration shows lack of care by the Corps.
- The commenter suggested alternative uses for the Lodge as a retreat, senior living, or lodging/restaurant.

USACE appreciates the time, thought and sentiment that the writer put into the letter. Unfortunately, trying to sell the building in its state of extreme disrepair would be even less viable for a private entity than for the Government. The presence of lead and asbestos that would require abatement is extremely costly, as would be the structural repairs required to rehabilitate even the core, original part of the building. As the commenter noted, past concessionaires could not keep up with maintenance and code requirements. USACE explored possibilities for reuse of the building over the years, and each time no deal was reached while the building continued to deteriorate.

5.5. Libraries and Public Locations where Draft EA was made available

USACE Conchas Lake Project Office

Tucumcari Public Library

602 S 2nd St, Tucumcari, NM. 88401

Las Vegas Carnegie Public Library

500 National Ave, Las Vegas, NM

USACE public website: http://www.spa.usace.army.mil/Missions/Environmental/Environmental-Compliance-Documents/Environmental-Assessments-FONSI

5.6. Mailing List for Draft EA

U.S. Environmental Protection Agency
Office of Communities, Tribes and Environmental Assessment
1201 Elm Street, Suite 500 (ORACN)
Dallas, Texas 75270-21

U. S. Fish and Wildlife Service
New Mexico Conservation Field Office
3800 Commons NE
Albuquerque, NM 87113-1001

New Mexico State Parks
1220 S. St. Francis Drive
Santa Fe, NM 87505

New Mexico Department of Game and Fish
One Wildlife Way
Santa Fe, NM 87505

NM State Historic Preservation Officer
Historic Preservation Division
Bataan Memorial Bldg
407 Galisteo Street, Suite 236
Santa Fe, NM 87501

NM True / NM Tourism Department
491 Old Santa Fe Trail
Santa Fe, NM 87501

Las Vegas / San Miguel County Chamber of Commerce

San Miguel County Manager

Tucumcari / Quay County Chamber of Commerce

Quay County Manager

Guadalupe County Manager

Santa Rosa Chamber of Commerce

Friends of Conchas Lake State Park

Private citizens who participated in scoping

REFERENCES

Brown, David E. 1982. Desert Plants: Biotic Communities of the American Southwest-United States and Mexico. University of Arizona, Superior, Arizona.

Brown, David E. (editor). 1994. **Biotic Communities: Southwestern United States and Northwestern Mexico**. University of Utah Press, Salt Lake City.

Brown, David E. and C.H. Lowe. 1977. **Biotic Communities of the Southwest Map**. USDA Forest Service, Ft. Collins, Colorado.

Center for Hearing and Communication. 2024. The Noise Center. https://www.chchearing.org/the-noise-center (accessed: 09 July 2024).

Conchas Dam Lodge Location Plan. 1940. On file, Rocky Mountain Region National Archives, Broomfield, Colorado. Record Group 79, Records of the National Park Service, Southwest Regional Office: Santa Fe, NM, Correspondence Relating to the Civilian Conservation Corps Camps in State Parks 1933-1943, 8NS-079-92-223, Box 207, Folder 204-10 By Field Offices SP-8-N.

Conchas Dam Recreational Area. 1941. CCC Work Accomplished under the Supervision of the National Park Service, December 1, 1939, to June 30, 1941, Conchas Dam, New Mexico. On file, Rocky Mountain Region National Archives, Broomfield, Colorado. Record Group 79, Records of the National Park Service, Southwest Regional Office: Santa Fe, NM, Correspondence Relating to the Civilian Conservation Corps Camps in State Parks 1933-1943, 8NS-079-92-223, Box 207, Folder Administration and Personnel SP-5-8.

Doty, Cecil J., Associate Architect. 1939. Field Report, Plans and Design Division, Conchas Dam. New Mexico, April 23, 24 1939. On file, Rocky Mountain Region National Archives, Broomfield, Colorado. Record Group 79, Records of the National Park Service, Southwest Regional Office: Santa Fe, NM, Correspondence Relating to the Civilian Conservation Corps Camps in State Parks 1933-1943, 8NS-079-92-223, Box 207, Folder 204-10 By Field Offices SP-8-N.

Hill, Katie. 2014 Guidance for Documenting CCC Properties: Examples from New Mexico: In Partial Fulfillment of the Requirements for the Degree Masters of Arts, Eastern New Mexico University, Portales, New Mexico.

New Mexico Rare Plant Website. 2023. https://nmrareplants.unm.edu/rarelist (Accessed: December 27, 2023).

New Mexico Department of Game and Fish. 2023. New Mexico Environmental Review Tool (NM ERT). Home | New Mexico Environmental Review Tool (nmert.org) (Accessed: December 27, 2023).

Schelberg, John D. and Julie Stone. 2005. National Register of Historic Places Nomination Form: Conchas Dam Historic District. (Conchas Dam Historic District was listed on the National Register of Historic Places on May 22, 2005). Report on File, U.S. Army Corps of Engineers, Albuquerque District, Albuquerque, NM.

U.S. Army Corps of Engineers (USACE). 1947. Master Recreation Plan, Conchas Dam Project. Corps of Engineers, Albuquerque District, May 1947.

USACE. 2022. Conchas Lake Master Plan. Canadian River Basin, San Miguel County, New Mexico. https://www.spa.usace.army.mil/Missions/Civil-Works/Recreation/Conchas-Lake/Master-Plan/ (Accessed: December 29, 2023).

U.S. Engineer Office. 1940. "History of the Conchas Dam and Reservoir Project, War Department," U.S. Engineer Office, Conchas District, Conchas Dam, New Mexico.

U.S. Engineer Office. 1941. "Design and Construction of Conchas Dam New Mexico Volume II" U.S. Engineer Office, Caddoa, Colorado.

U.S. Fish and Wildlife Service (USFWS). 2020. Monarch (Danaus plexippus) Species Status Assessment Report. V2.1 96 pp + appendices.

USFWS. 2025. IPaC Information for Planning and Conservation. https://ecos.fws.gov/ipac/ (Accessed: August 07, 2025)

Van Citters, Karen, and William A. Dodge. 2007. Conchas Dam and Lake's South Side Recreation Area History Building Survey. Completed for the US Army Corps of Engineers, Albuquerque District. Albuquerque, New Mexico.