PUBLIC COMMENTS

- Received prior to the deadline of July 22 at 5 pm and filed alphabetically by last name of commenting individual.
- Please refer to the Staff Response to Comments table.

Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Wednesday, July 27, 2016 1:21 PM
To: Lehner, Catalina L.
Subject: FW: Official EPC Comments on the ABC Comp Plan

Catalina,

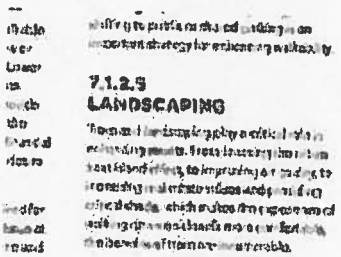
This was the email that we noticed was missing from your file yesterday. We didn't make it through all of the file, but I wanted to make sure you got this one.

Thanks,
Terra

From: Jitka Dekojova [mailto:JitkaD@dpsdesign.org]
Sent: Tuesday, July 12, 2016 10:14 AM
To: Planning Comp Plan-UDO
Cc: Ken Romig
Subject: Official EPC Comments on the ABC Comp Plan

Attn: Karen Hudson

There are many instances, where the draft mentions "LANDSCAPING". This term is misleading, degrading to the profession of landscape architects, and purely unprofessional. I suggest to use "landscape design", "landscape", or "landscape elements" (as fitting to the context) instead.


7.1.2.5
LANDSCAPING

DEKKER PERICH SABATINI

Jitka Dekojova, ASLA
Landscape Architect / NMASLA President
Dekker/Perich/Sabatini
505.761.9700 / dpsdesign.org

Newly Renovated Albuquerque Convention Center Wins National ENR Best of the Best Award.

Reed, Terra L.

From: Loren and Sherri Hines <hinesl_s@msn.com>
Sent: Wednesday, July 13, 2016 1:26 PM
To: Trujillo, Nicole M.; Planning Comp Plan-UDO
Subject: Re: EPC case Planners
Attachments: 2016-07-13 EPC transmittal 001.jpg; comp plan recommendations OSAB 7-12-16.doc

Nicole:
I have attached the comments and the transmittal. I copied this email to the email address recommended by the Planning Department email. Please forward to the three Planning Dept. employees you listed below, to Board Members and anyone in Parks and Rec that needs a copy. If anyone needs the originals before the 26th, let me know.
Thanks again,
Loren

From: Trujillo, Nicole M. <nmtrujillo@cabq.gov>
Sent: Wednesday, July 13, 2016 12:52 PM
To: 'hinesl_s@msn.com' (hinesl_s@msn.com)
Subject: FW: EPC case Planners

Loren,
Please see below e-mail from Kym Dicome. She said you could e-mail the comments/recommendations. Please let me know if you have any questions. Thanks!

Nicole
452-5212

From: Reese, Jourdan
Sent: Wednesday, July 13, 2016 12:45 PM
To: Trujillo, Nicole M.
Subject: FW: EPC case Planners

Hi, Nicole

So these are comments for the comprehensive plan correct? that's what the august 4th meeting for EPC is about. Comments for that meeting are due today....When I spoke to Kim she said she would email me and here it is! let me know if you need anything else.

From: Dicome, Kym
Sent: Wednesday, July 13, 2016 12:42 PM
To: Reese, Jourdan
Subject: EPC case Planners
vquevedo@cabq.gov
mgould@cabq.gov
mvos@cabq.gov

Please copy me on the email. Thanks.

The City of Albuquerque
Open Space Advisory Board

July 12, 2016

Report to the City of Albuquerque Environmental Planning Commission regarding the proposed Draft Revised City-County Comprehensive Plan

The Open Space Advisory Board wishes to congratulate the City Planning Department for the time and thought evident in the draft Comprehensive Plan. The draft is the product of the commitment and expertise of the planning staff. Everyone who participated should be proud of this guide for the City's future.

The Board is directed by city ordinance to review and make recommendations on the Comprehensive Plan to the Environmental Planning Commission. We have adopted the following recommendations for the EPC's consideration. Our remarks relate to Chapter Ten "Parks and Open Space".

A. General policies and principles. We believe that the draft plan captures the vision needed in policies and principles to continue Albuquerque's impressive progress in developing our community's Open Space system.

B. Page 10-5: Challenges. Number four "Mandate to manage Open Space. . ." could be improved with a reminder of the additional costs associated with expanding open space holdings. Maintenance of the current open space is not adequately funded.

C. Page 10-5: Challenges. Number six "timing acquisition concurrently". The timing of open space acquisitions could better be viewed as "coordinated" or "sequenced" with development. The word concurrently implies at the same *time.*

D. Page 10-11: Paragraph three, reference to "level of service". The City's ability to respond to increasing population and use of our open spaces calls for a "Use Plan", based on research into the volume and types of future demands. This would be an appropriate place to call for the development of a Use Plan.

E. Page 10-12: Last paragraph referring to the Open Space Advisory Board. This short description is inadequate to provide the reader with understanding of how the board of volunteers serves the public interest in the planning and management of the huge land holdings and Trust Fund of our open space system. We suggest the following replacement, with the heading The Open Space Advisory Board:

A board composed of seven citizen volunteers appointed alternately by the Mayor or City Council meets at least once monthly to implement a broad range of duties required by City ordinances, policy resolutions, and administration of the open space system. Major concerns of the Board include investment policy for the Open Space Trust Fund, acquisition of selected additional open space lands, maintenance of the existing system, plans for improvements such as trails, revegetation, or visitor access, and coordination with the Bernalillo County open space system. Meetings of the Board are traditionally convened at the Open Space Visitors' Center and are open for public participation.

F. Page 10-14: Third paragraph regarding purchase of additional lands. This paragraph is now out of date. We suggest the following replacement:

Financing of land acquisitions has depended on many sources of funds. The Open Space Trust Fund is invested and will provide increasing acquisition and maintenance funds for future budgets. In 2016, the City Council authorized a twenty-year program of bond issues with two (2) percent of general obligation bond proceeds dedicated to the open space program. This is estimated to provide approximately $30. million for the open space system.

G. Page 10-22: Preserve the ceja from Central Avenue south to its terminus, north of I-25, as Open Space.

H. Page 10-23: To insert the word "Government" in between Maintain and Irrigation and add a "to" before the be. So it should read,

"Design and maintain *government* irrigation ditches and acequias *to* be compatible with neighborhood character."

Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Wednesday, July 20, 2016 4:12 PM
To: Renz-Whitmore, Mikaela J.; Barkhurst, Kathryn Carrie; Toffaleti, Carol G.; Lehner, Catalina L.
Subject: FW: Official EPC Comments on the ABC Comp Plan

FYI.
I responded and am adding to the digital folder/spreadsheet.

Thanks,
Terra

-----Original Message-----
From: Catherine Mexal [mailto:cmexal@gmail.com]
Sent: Wednesday, July 20, 2016 3:08 PM
To: Planning Comp Plan-UDO
Subject: Official EPC Comments on the ABC Comp Plan

Chair Karen Hudson:

I appreciate to intent of revising the Comp Plan so that many layers of regulation are flattened to one and I appreciate the difficulty of such a large undertaking in a short time. And it's attractive to look at....

However, fairness and quality are glaring problems with the latest draft.

Fairness:
- Neighborhoods were given little time to process the hundreds of pages in the versions. Many of our valued residents (valued to us, anyway) don't have access to or skill with computers which can handle PDFs, magnify maps, navigate the maze of links, etc., to be able to verify statements and provide feedback. There is a whole, large audience that has been ignored — because involving it is not expedient.
- And it is grossly unfair that planning professionals have spent their work time developing these versions and the public is given such a small window in which to process the volume and provide feedback.
- And we're trying to hit a moving target when the chapters are being updated (and completely renamed!) as we're trying to review them — the rug is being pulled from under us.

Quality:
- A document is not ready for prime time when it's filled with references of "See Table X" throughout Chapter 8 and ALL the tables are labeled "Table X". (Corrected in the last week).
- The Zone Conversion Map for my neighborhood (Wells Park) was wrong. We were set to go from Residential to Mixed-Use Transitional (commercial). After a lot of time and effort and a meeting, ABC-Z staff agreed that they'd made a mistake. While that was good news, it was still an expensive waste of our (unpaid) time and effort. And the "improved" zoning designation is Residential-Townhouse which means our neighborhood of bungalows will become an unattractive cacophony of housing styles.
- The map showing Areas of Consistency and Change, as recently as the second week in July, stated that Areas of Change were shown in blue but the only blue on the map was the river! (Corrected after my comment.)
- How many other mistakes have been missed by the public reviewers?!

Finally, sector plans are being discarded solely for the benefit of developers. What about the residents who developed those smart and functional sector plans for the benefit of their neighborhoods? No pun intended but developers trump residents.

This document is not ready to "go live" with so many errors still in it. The public hasn't had adequate time to process and debug the document. And, finally, it's disrespectful to give the public such an error-filled draft that is being updated as we review it.

Respectfully submitted,
Catherine Mexal
1404 Los Tomases NW
87102

Reed, Terra L.

From:	Kim Murphy <kmurphy@unm.edu>
Sent:	Friday, July 22, 2016 1:21 PM
To:	Planning Comp Plan-UDO
Cc:	Renz-Whitmore, Mikaela J.; Webb, Andrew
Subject:	Part 1 of 3: Official EPC Comments: ABC Comp Plan (Karen Hudson, Chair)
Attachments:	ABC-Z ~ EPC Letter (DA- AA 7-22-2016).pdf

Please see the following correspondence addressed to Karen Hudson, EPC Chairperson, regarding the ABC Comprehensive Plan (June 2016 Draft):

Part 1 of 3 Attached: Letter dated July 22, 2016 regarding Development Areas (Albuquerque Academy)

Part 2 of 3: Memo dated July 22, 2016 regarding Employment Center (UNM)

Part 3 of 3: Letter dated July 22, 2016 regarding General Comments (Institutional Clients)

As always, thank you again for the opportunity to participate in this important planning endeavor.

Kim D. Murphy
Altura Real Estate LLC
505-610-1001

Altura Real Estate, LLC

Kim D. Murphy, Principal
kim@altura-real-estate.com

July 22, 2016

Chair Karen Hudson, Environmental Planning Commission
c/o City of Albuquerque Planning Department
600 2nd Street NW
Albuquerque, NM 87102

RE: Official EPC Comments on the ABC Comprehensive Plan
Representing Albuquerque Academy: Development Areas (City)

Dear Chairperson Hudson,

I have been following the ABC-Z Project, encompassing both the Comprehensive Plan Update ("Plan" or "CPU") and Integrated Development Ordinance ("IDO"), on behalf of several large institutional property owners in Albuquerque since mid-2015. This is a very complex and important undertaking with far-reaching implications for growth and development having significant impacts to all property owners and users.

I have submitted a number of written memos to the ABC-Z Team providing comments on previous CPU Drafts. These comments have been both general, dealing with the broad principles and policies of the Plan, and specific, in terms of their application to my client's property.

The purpose of this memo is to point out an inconsistency in the City's Development Area designations set forth in the Plan involving the Albuquerque Academy Property caused, we believe, by a mapping error in the AGIS Data Base and lack of appropriate consideration of the Academy Master Plan.

A summary of general, overarching concerns with the Plan on behalf of my institutional clients is being submitted to the EPC in a separate companion memo of this same date.

Albuquerque Academy Property: Current Zoning & Master Plan

The Albuquerque Academy Property, bounded by Wyoming Blvd. and Ventura, and by Harper and Academy Blvd comprising approximately 312 acres, was zoned SU-1

Kim D. Murphy, Principal
kim@altura-real-estate.com

for Planned Residential Development (Z-78-153) in 1979, specifically including the approval of the following uses:

Academy Campus	146 acres
Mixed Office/Residential	25 acres
Neighborhood Commercial	12 acres
Multi-family (R-2)	15 acres
Townhome (8 Du/Ac Max.)	69 acres
Townhome (RLT)	40 acres
Neighborhood Park	5 acres

On July 20, 1989, the EPC approved a Site Development Plan for Subdivision (Z-78-153-3) covering the Academy Property which indicates the locations, land use requirements and development/design standards for all of the land uses approved by the 1979 zoning action.

It is noteworthy that the EPC voted to approve the Site Development Plan based in part on the following finding (#1):

> *Future site development plan submittals of the Academy property were required to be accompanied by a "Master Plan" for the entire school property at the time of the approval of the Middle School (Z-78-153-2). The site development plan for subdivision purposes fulfills this requirement.*

Further, the City Zoning Code defines Master Development Plan as "a plan meeting the requirements for a site development plan for subdivision" (Section 14-16-1-5, City of Albuquerque Comprehensive Zoning Code.

<u>It is absolutely clear that the Site Development Plan for Subdivision approved by the EPC on July 20, 1989 constitutes a City-approved Master Plan of the Academy Property.</u>

2016 Comprehensive Plan: Development Areas (City)

Since 1975, the Comprehensive Plan has identified Development Areas to guide growth to appropriate areas. For the City, the 2016 Plan creates just two (2) types of Development Areas: Areas of Change and Areas of Consistency (Figure 5-7, Page 5-25). As stated in the Plan: "Directing growth to Areas of Change is intended to help preserve and protect established neighborhoods in Areas of Consistency." (Page 5-24). With respect to Areas of Change, the Plan goes further to state:

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kim@altura-real-estate.com

Areas of Change policies allow for a mix of uses and development of higher density and intensity in areas where growth is desired and can be supported by multi-modal transportation. (Page 5-24)

Albuquerque Academy Property: Area of Change Designation

Beginning in January and through June, the various drafts of the Comprehensive Plan have characterized the Albuquerque Academy Property very differently with respect to Areas of Change and Areas of Consistency.

The January 2016 Draft Comprehensive Plan identified **all** the Academy Property as Area of Change (Page 5-13), consistent with criteria set forth on page 5-16 of the draft, which criteria includes: "Large properties with approved Master Development Plans (site development plans with specialized, detailed design standards)"

A Focus Group Presentation on Land Use dated April 15, 2016 showing the latest modifications to the Draft Comprehensive Plan identified that **none** of the Academy Property was designated Area of Change. **All** of the Academy Property was designated as Area of Consistency in this draft.

The May 2016 Draft Comprehensive Plan identified just the **western** portion of the Property (campus & mixed office/residential tracts) as Area of Change and the remaining **eastern** portion of the Property (multi-family, neighborhood commercial, & townhome) as Area of Consistency.

The EPC June 2016 Draft Comprehensive Plan is consistent with the May 2016 Draft with respect to Areas of Change and Areas of Consistency for the Academy Property.

The Academy Property meets the criteria for Area of Change designation set forth in the Plan (Page 5-26 and Appendix C). However, as stated in a prior memo to the ABC-Z Team dated April 20, 2016, the re-designation of the Academy Property from Area of Change in the January 2016 Draft to Area of Consistency in the April 2016 Draft appears to be based on incorrect information in the City's AGIS Data Base (See memo attached). Further, it appears that this AGIS mapping error is continuing to influence the current designation set forth in the EPC June 2016 Draft. The result being that the Academy Property, covered in its entirety by an approved Site Development Plan, is inexplicably split between Area of Change and Area of Consistency.

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kim@altura-real-estate.com

It's possible that the AGIS mapping error may not be the sole reason for the spit designation, which may be in part due to the desire to "protect" the adjoining established neighborhoods to the east of the Academy Property. While this is a reasonable concern, the Area of Consistency designation on the eastern portion of the Academy Property is unnecessary. The Plan itself acknowledges that development in Areas of Change can provide appropriate buffering and protection to abutting land designated Area of Consistency through regulations, requirements and standards proposed in the draft Integrated Development Ordinance (May 2016), specifically Section 4-8 Neighborhood Edges. Handling these concerns at the development-level rather than the Comp Plan level seems proper.

Albuquerque Academy Property: Recommendation

The consistent application of the Plan's stated criteria for Areas of Change and Areas of Consistency would result in all the Academy Property covered by the approved Site Development Plan being designated as Area of Change as shown in the January 2016 Draft. We recommend that this change be instituted in the current draft Comprehensive Plan document and that the Albuquerque Academy Master Plan (1990) be added to the list of City Master Plans in Table A-3, Appendix C.

Thank you for your consideration of this important matter.

Respectfully,

Kim

Kim D. Murphy

Altura Real Estate, LLC

Kim D. Murphy, Principal
kim@altura-real-estate.com

Memo

To: ABC-Zone Team

From: Kim Murphy KDM

Date: April 20, 2016

RE: Revised CP Draft Comments (Partial)

The purpose of this memo is to comment on the Comp Plan Update ("CPU") revisions presented in the public information meeting on April 15, 2016. While the complete revised CPU is forthcoming, and thus will provide an additional opportunity review and comment, it would seem timely to mention several significant changes in the Plan in the vicinity of Albuquerque Academy that were announced last Friday, since these changes may be based in part on misinformation in the City's mapping data base.

At the outset, I wish to emphasize that the concerns addressed in this memo relate solely to the revised CPU *vis-à-vis* the current approved zoning and site master development plan for the Academy Property, and <u>are not based</u> on any new development under consideration. These concerns are especially significant due to the importance of the Academy Campus within the overall ownership area, and the desire by the Academy to preserve the integrity of current master development plan for the Campus and surrounding property.

First, as background, the Academy Property is currently zoned SU-1 for Planned Residential Development (Z-78-153), which was approved in August 1979. A table summarizing the current zoning totaling approximately 312 acres is shown on the attached graphic exhibit. Additionally, the entire Academy Property is subject to an approved Site Plan for Subdivision or Master Development Plan (Z-78-153-3) dated March 1990, based on the date of final DRB approval. This Master Development Plan is also shown on the attached graphic exhibit.

As the graphic exhibit illustrates, the southern portion of the Academy Property abutting Wyoming/Academy intersection is approved for Mixed Office & Residential Uses, with Incidental Commercial, up to a maximum 1.0 FAR (Tract A-2 containing 25.12 acres). A parcel designed Multi-family adjoins the Mixed Use parcel to the east and is approved for R-2 residential uses, up to a maximum density of 30 dwelling units per acre (Tract A-3 containing 13.15 acres). The remaining portions of the Master Development Plan are approved for a Townhome, Townhome/Single Family, Neighborhood Commercial and Park uses.

8633 Kacey Lane SW Albuquerque NM 87105-7612 (505) 610-1001

Altura Real Estate, LLC

Kim D. Murphy, Principal
kim@altura-real-estate.com

The revised CPU presented publically last week indicates several important changes from the first CPU draft with respect to Areas of Change/Consistency which don't take into account the approved Academy Master Development Plan, and I suspect that this is due in part to misinformation located on the City's GIS Existing Land Use Map. This error may have caused a re-evaluation of the Academy Property based on revised criteria for Area of Change/Consistency designation.

Specifically, the City's GIS Existing Land Use Map shows the entire southerly portion of the Academy Property along Academy Blvd from Wyoming to Ventura as "Parks / Recreation", when in fact this area should be designated "Vacant / Other". As already mentioned, this error may have influenced the Area of Change designation for this area.

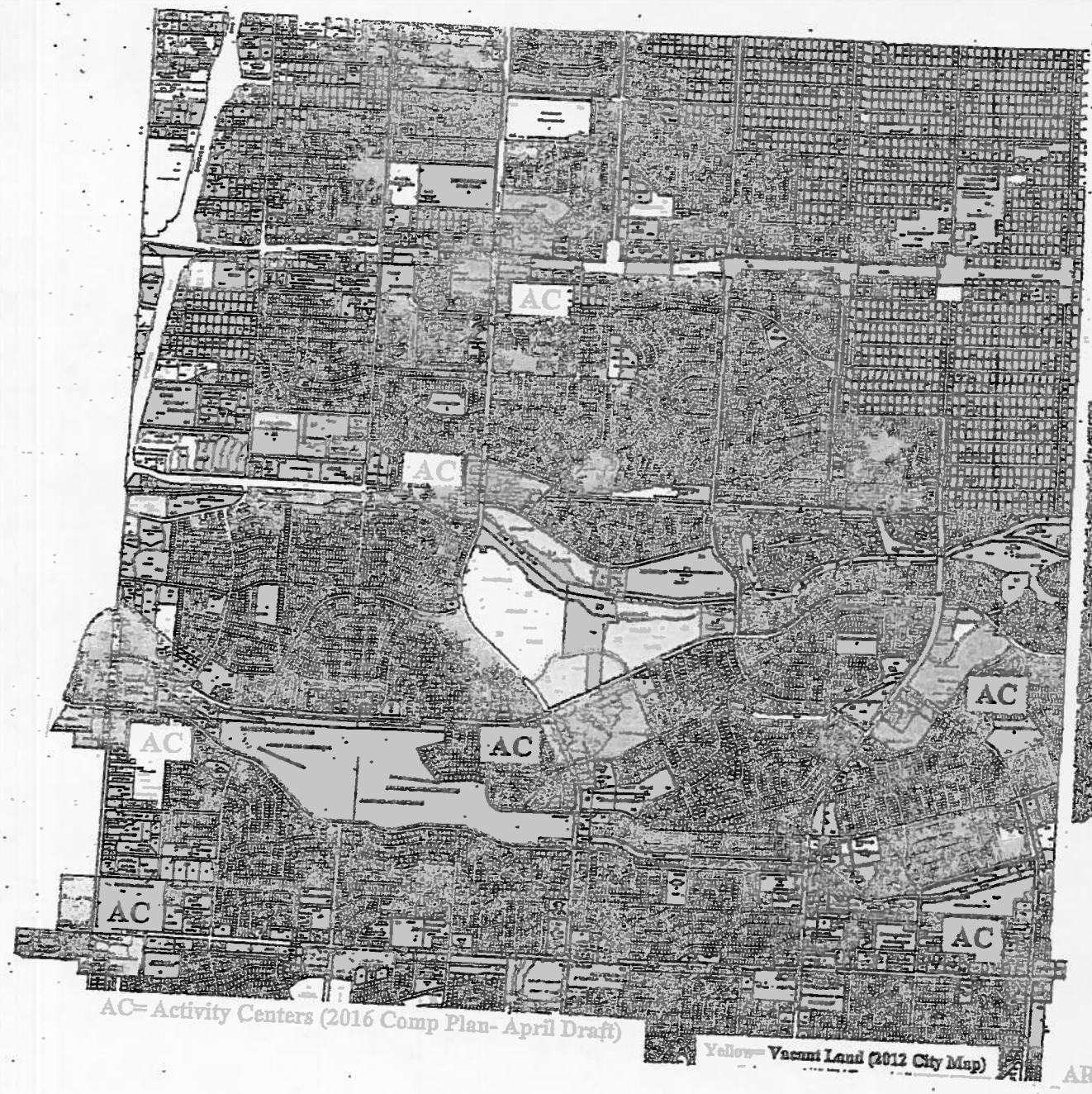
The revised CPU also incorporates changes in the types of Centers & Corridors, as well as the criteria for their designation. In my opinion, the new typology is an improvement. However, I'm concerned that the GIS Map error mentioned above, combined with a lack of awareness of the Academy Master Development Plan may be responsible for less than full consideration of the importance of Activity Center designation in the vicinity of Wyoming Blvd and Academy Blvd (see attached graphic exhibit).

From a more general perspective, while Centers & Corridors and Areas of Change/Consistency are valid and useful concepts as a framework for accommodating the City's growth, the application of these concepts as presented in the revised CPU appear in some cases to be problematic, especially in already developed areas. For example, in the portion of the City north of Montgomery Blvd. and east of I-25, the revised CPU Centers & Corridors Map shows eight (8) "Activity Centers", almost all of which are shown on the attached graphic exhibit as well. No Urban Centers or Employment Centers are shown in this area, which may or may not be appropriate. However, when the Centers Map and the Areas of Change/Consistency are compared, it appears that while the CPU intends to focus new growth to these Activity Centers, the Area of Change Map suggests that this may be difficult or impossible in this area as only a very few small areas of <u>already existing developed parcels</u> are associated with the Activity Centers. Understanding that accommodating new growth in existing developed areas is challenging, it would seem obvious that new growth should be encouraged for vacant parcels adjacent to Activity Centers, especially those appropriately zoned for development.

Thank you for your consideration of these matters. I welcome the opportunity to discuss them with you further.

Warm regards.

8633 Kacey Lane SW Albuquerque NM 87105-7612 (505) 610-1001



AC= Activity Centers (2016 Comp Plan- April Draft)

Yellow= Vacant Land (2012 City Map)

Current Zoning- SU-1 for PRD (Z-78-153)

Academy Campus	146 Ac	Townhome (8du/ac)	69 Ac
Mixed Office/ Residential (1.0 FAR)	25 Ac	Neighborhood Commercial	12 Ac
Multi-family (R-2)	15 Ac	Townhome/SF (RLT)	40 Ac
Park	5 Ac		

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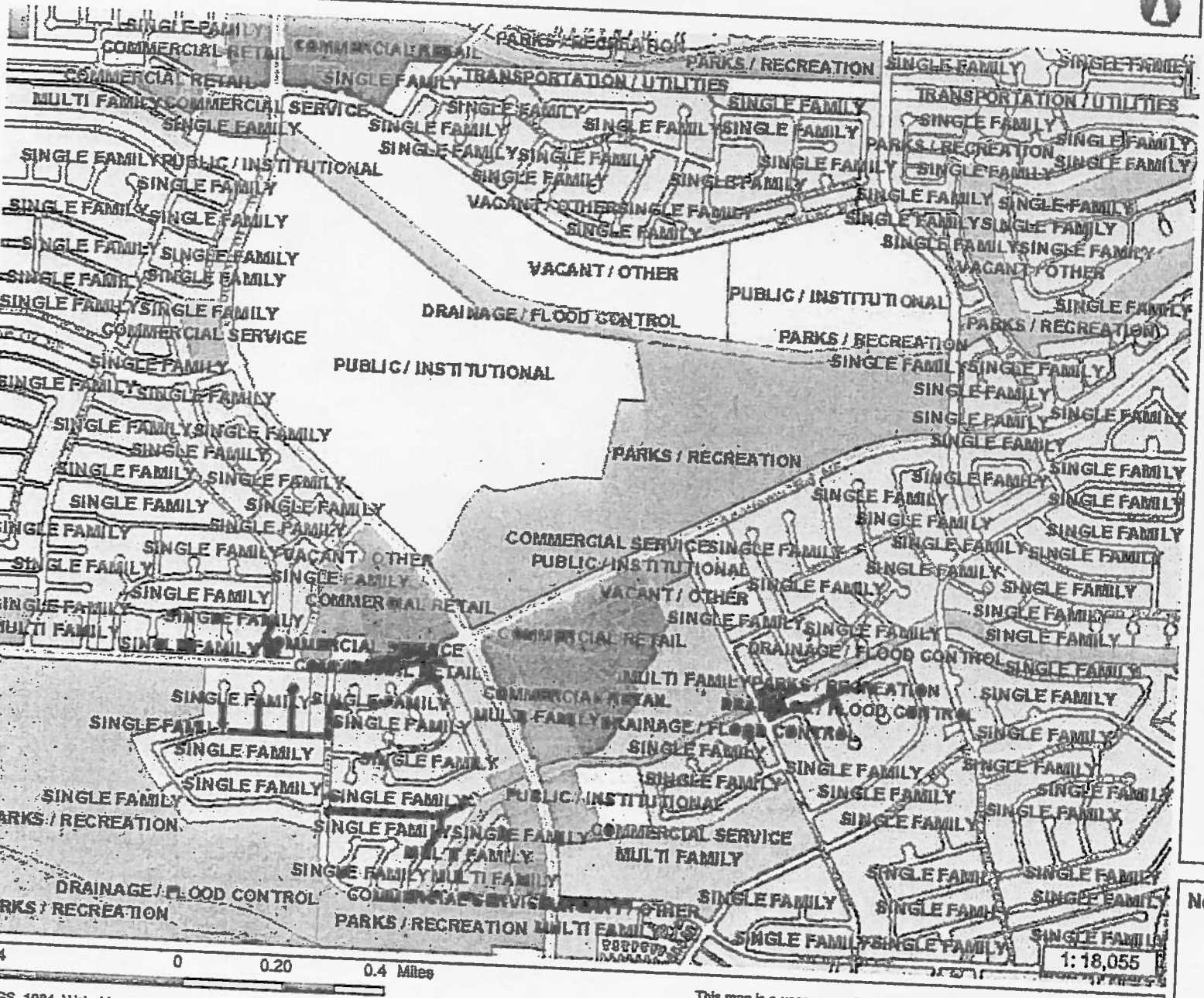
City of Albuquerque



Legend

Land Use

- <all other values>
- SINGLE FAMILY
- MULTI FAMILY
- COMMERCIAL RETAIL
- COMMERCIAL SERVICE
- WHOLESALE / WAREHOUSING
- INDUSTRIAL / MANUFACTURING
- DRAINAGE / FLOOD CONTROL
- PARKS / RECREATION
- PUBLIC / INSTITUTIONAL
- TRANSPORTATION / UTILITIES
- PARKING LOTS / STRUCTURES
- AGRICULTURE
- VACANT / OTHER

Municipal Limits

- Corrales
- Edgewood
- Los Ranchos
- Rio Rancho
- Tijeras
- UNINCORPORATED

World Street Map

0.4 0 0.20 0.4 Miles

1:18,055

WGS_1984_Web_Mercator_Auxiliary_Sphere
4/20/2018

© City of Albuquerque

This map is a user generated static output from www.cabq.gov/gis and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.
THIS MAP IS NOT TO BE USED FOR LEGAL PURPOSES

Notes

Altura Real Estate, LLC

Kim D. Murphy, Principal
kim@altura-real-estate.com

July 22, 2016

Chair Karen Hudson, Environmental Planning Commission
c/o City of Albuquerque Planning Department
600 2nd Street NW
Albuquerque, NM 87102

RE: Official EPC Comments on the ABC Comprehensive Plan
Representing University of New Mexico: Employment Center (UNM South Campus)

The following is re-statement of my memo to the ABC-Z Team dated June 20, 2016 regarding the expansion of the Employment Center designation of UNM South Campus-CNM Main Campus and the designation of this expanded Employment Center as an Area of Change. The text below reflects the original memo in its entirety.

On behalf of the University of New Mexico, I have reviewed both the April and May version of the City's Comprehensive Plan 2016 Update for consistency with the University's South Campus current land use and future development plans.

Generally, but with the acknowledgement that University land is not subject to local zoning and development regulations, the City's Comprehensive Plan 2016 Update (CPU) incorporates very little information from the UNM Campus Master Plans (2011). And there are few meaningful linkages between the planning framework and concepts of the UNM Campus Master Plans and those of the CPU, when in fact many exist. Perhaps (and hopefully) better coordination will occur later during the more detailed Community Planning Area planning endeavor.

However, one important opportunity exists currently for the CPU to reflect anticipated UNM-CNM growth and development that relates to UNM South Campus, and the adjoining CNM Main Campus, comprising approximately 500 acres. The geographic boundaries of this area are shown on the UNM South Campus-CNM Map, included as Attachment 1. Land use and demographic information for this area is provided on the UNM-CNM Employment Center Fact Sheet, included as Attachment 2.

The UNM South Campus-CNM Map and Fact Sheet illustrate two different geographic areas: the smaller area (500 acres) is composed on almost entirely UNM, CNM and City land, with a minor amount of adjoining private land (approx. 2% of total). This is the area being recommended for inclusion in the CPU Employment Center for this area. The larger area (673 acres) conforms with MRCOG DASZ boundaries, and includes APS and

Kim D. Murphy, Principal
kim@altura-real-estate.com

additional private land. Statistics are presented on the Fact Sheet for this larger area for comparison purposes only.

In the April CPU draft, UNM South Campus-CNM is generally identified as an Employment Center (See Exhibit "A"), which seems reasonable and appropriate. The current Comprehensive Plan (1988, amended thru 2013) identifies UNM South Campus-CNM Main Campus area as combination of Major Activity Center and Community Activity Center, with a Special Activity Center overlay (See Exhibit "B" with 2 pages). However, under the improved and simplified Activity Center scheme (new terminology) reflected in the May Comp Plan Draft, especially the Centers & Corridors Map (See Exhibit "C"), the Activity Center boundaries are an inadequate indication of the importance of the regional importance of the UNM/CNM area, as large portions of the UNM Science & Technology Park and South Campus Commercial Development District are omitted (See Exhibit "D" from UNM South Campus Placemaking Plan 2010).

Further, as you know, the CPU identifies two types of Development Areas within the City: Areas of Change and Areas of Consistency (See Exhibit "E"). Unfortunately, this map appears to rely on the 2013 Comp Plan activity center boundaries, and therefore overlooks the UNM Campus Master Plan growth and development potentials as indicated on Exhibit "D".

On behalf of UNM, I am requesting that the UNM South Campus-CNM Employment Center include all the land shown on Attachment 1 totaling 500 acres, and that these areas be further designated as "Areas of Change" in the 2016 Comprehensive Plan Update.

Please feel free to contact me with any questions or comments.

Regards, Kim

Google earth

miles 1

km 2

Attachment 1

Attachment 2

Comprehensive Plan Update (2016)- City of Albuquerque
FACT SHEET: UNM South Campus – CNM Employment Center
June 2016

	UNM-CNM	MRCOG (2012) (8032, 8051, 8052, 8071 & 8072)
Land Area:	500 Acres	673 Acres
Population:	1,300	2,594
Households:	1,000	1,567
Single-family:	0	334
Multi-family:	1,100	1,316
Employment:	2,800	3,286
Post-Secondary Students (HC):	13,000	13,162
Annual Visitors- Sports / Entertain.	1.3 million	Not Specified

Land Use:

• Sports Fac.+ Parking	164 acres	33%
• Research Park	57 acres	11%
• Multi-family	36 acres	7%
• Education	89 acres	18%
• Hospitality	5 acres	1%
• Commercial	1 acres	
• Vacant	88 acres	17%
• AMAFCA	27 acres	5%
• Major ROW	39 acres	8%
Total	500 acres	100%

Land Ownership:

• UNM	311 acres	62%
• CNM	82 acres	17%
• City	68 acres	14%
• AMAFCA	27 acres	5%
• Private	12 acres	2%
Total	500 acres	100%

Employment Centers

Exhibit "A"

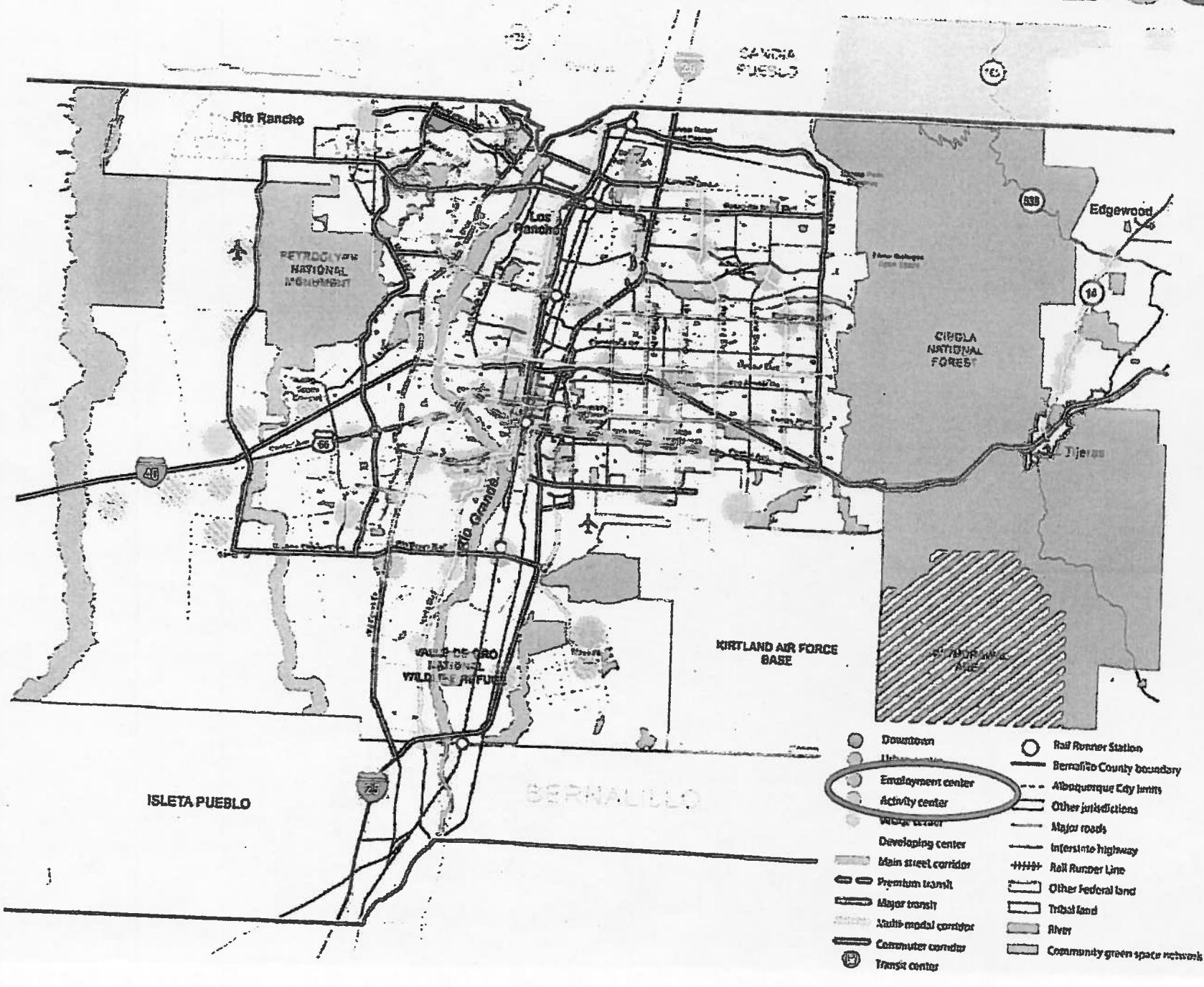


Exhibit "B"

Figure 30

DEVELOPMENT AREAS WITH ACTIVITY CENTERS & TRANSPORTATION CORRIDORS

Ref. CABQ R-13-172; BernCo 2013-70

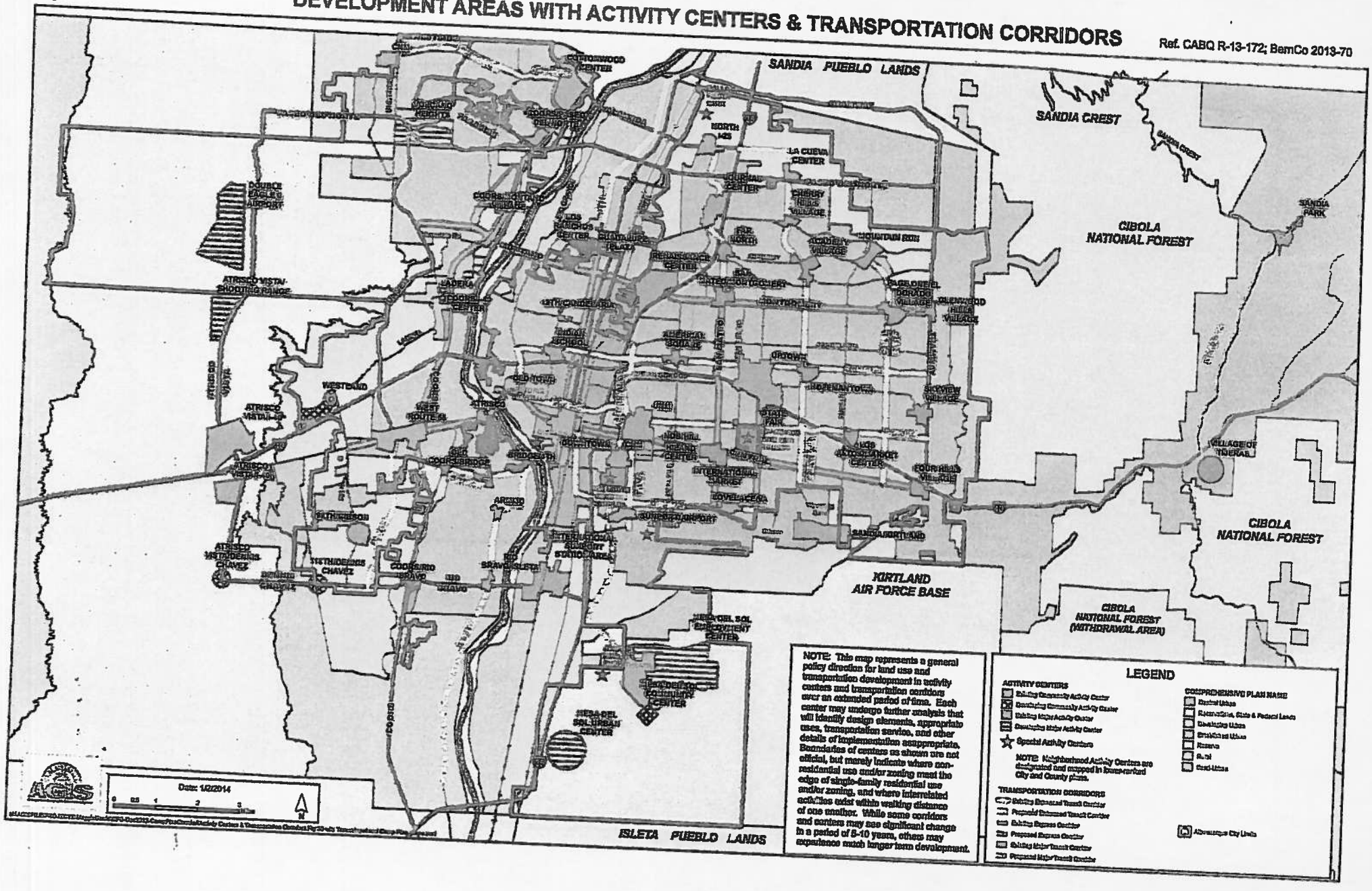


Exhibit "B" Cont.

Table 22: Policy a: TYPES OF ACTIVITY CENTERS

	Neighborhood Activity Center	Community Activity Center	Major Activity Center	Specialty Activity Center	Rural Village Center
Purpose:	Provides for the daily service of convenience goods & personal services for the surrounding neighborhoods. It serves as the social and recreational focal point for the surrounding neighborhoods and is accessible from all surrounding residential developments.	Provides the primary focus for the entire community sub-area with a higher concentration and greater variety of commercial and entertainment uses in conjunction with community-wide services, civic land uses, employment, and the most intense land uses within the community sub-area.	Provides the most highly concentrated locations of commercial, service and employment uses in conjunction with area-wide needs.	Provides locations for unique attractions serving local, regional and statewide needs.	Provides a location for the daily goods and service needs of surrounding rural communities. It should include pedestrian and non-motorized travel amenities such as sidewalks or trails, depending on area character and respecting its history.
Service/Market Area:	- ideally up to .5 mile walking distance - serves 15,000 population - in a larger driving service area	- up to 3 miles - serves population of 30,000+	- serves the entire metropolitan population and beyond	- serves the entire population of the metro area; draws some users from around New Mexico and nationally	- surrounding rural communities
Access: - street designation - modes of travel	- located on local or collector streets - least auto dependent - active pedestrian and bicycle connections should be provided to all adjacent neighborhoods, schools, and parks - convenient transit services should be connected with community-wide and regional transit development	- very accessible by automobile - located on minor & major arterial streets - should provide main hub connecting to regional transit system - community-wide trail network should provide access to center - the interior of the center should be very accommodating to the pedestrian, even within the predominantly off-street parking areas	- accessible by all modes of travel, including pedestrians and bikes - located at major roadways and/or major transit stops/transfer points - served by on street and off-street parking; structures encouraged - major street intersections designed to facilitate pedestrian - transit connections	- accessible by all modes of travel, depending on nature of uses - located on or easily accessible to major roadways - served mainly by off-street parking	- accessible by vehicle, located on an arterial street - should afford opportunity to walk safely from one use to another, proximate use on same side of roadway - pedestrian and non-motorized travel amenities
Land Uses:	Core Area: 5-15 acres - minimum noxious impacts to sensitive adjacent uses EXAMPLE OF TYPICAL USES: - convenience grocery, dry cleaners, gift shop, deli - public and quasi-public uses (branch library, post office, police, fire, etc.) - garden offices - Neighborhood Service Area - daycare center - apartments, townhouses, patio homes and shop houses - elementary school	Core Area: 15-60 acres + adjacent contributing uses EXAMPLE OF TYPICAL USES: - low-rise office - public & quasi-public uses (e.g. post office, library) - entertainment (restaurants, theaters, etc.) - hotel/motel - shelter care - medical facilities - education facilities - large religious institutions - medium density residential - middle/high school - senior housing - community or senior center - park-and-ride facility under certain conditions	Area: 300 acres or more - land uses typical in modern commercial, office, and technology centers, including medium to high density residential in sensitive relationship to employment - transition from intense core to surrounding residential neighborhoods EXAMPLE OF USES: - mid & high rise office - hotels - major cultural, entertainment uses - regional & corporate offices - retail; service - technology/light manufacturing - higher education facilities - public & quasi-public uses - medium to high density residential	Area: Up to several hundred acres, depending on nature of uses EXAMPLES OF USES: - unique, large-scale recreational attractions - major air transportation hub - supporting retail and service uses (e.g. restaurants gift shops, administrative offices)	Area: several acres, depending on use/mix EXAMPLES OF USES: - grocery - service station - post office or other civic use - restaurant - office - retail and service uses - residential
Scale: a. platting b. buildings (size, massing, height, intensity, setbacks) c. parking d. pedestrian amenities	a. walkable from one side to another; fine grain/small parcels b. 1-2 story; small buildings close or touching each other, is transparent; windows toward street buildings oriented to street c. on-street parking is encouraged; "tenser" parking; park once; bicycle parking is required d. intimate outdoor seating should be provided by individual businesses for informal gathering (depends on business) at or near pedestrian paths/sidewalks	a. Some larger parcels, but heavily punctuated with fine grain, smaller parcels; very walkable b. 2-3 story; moderate floor area ratios (.3 to 1.0); connections between buildings and to sidewalks; more than one façade; buildings separate off-street parking from the street c. predominantly off-street parking; site circulation plan is important to avoid conflict between pedestrian and auto; parking in lots or structures; pedestrian paths between parking & bldg.; bicycle parking is encouraged d. public plaza/open space should be provided	a. mixed small and large parcels b. 3 story and higher; floor area ratios of 1.0 and larger; connections between buildings and to sidewalks; buildings close or touching in more urban of centers c. on-street and off-street parking; opportunity for park-and-ride; structured parking encouraged d. larger scale plazas and paths; greater opportunity for public-private partnership in creating public spaces	a. typically one large parcel, but may be broken up by multiple buildings b. buildings and related facilities may be of any height, appropriate to use and size c. predominantly off-street surface parking; site circulation plan should avert conflict between pedestrian movement and vehicles d. interior of center should be very accommodating to the pedestrian, even within off-street parking areas	a. platting varies with use b. 1-2 story buildings in scale with surrounding rural character & market c. off-street parking per use; might be shared d. should afford opportunity for pedestrians to walk from one use to another, especially when on same side of highway

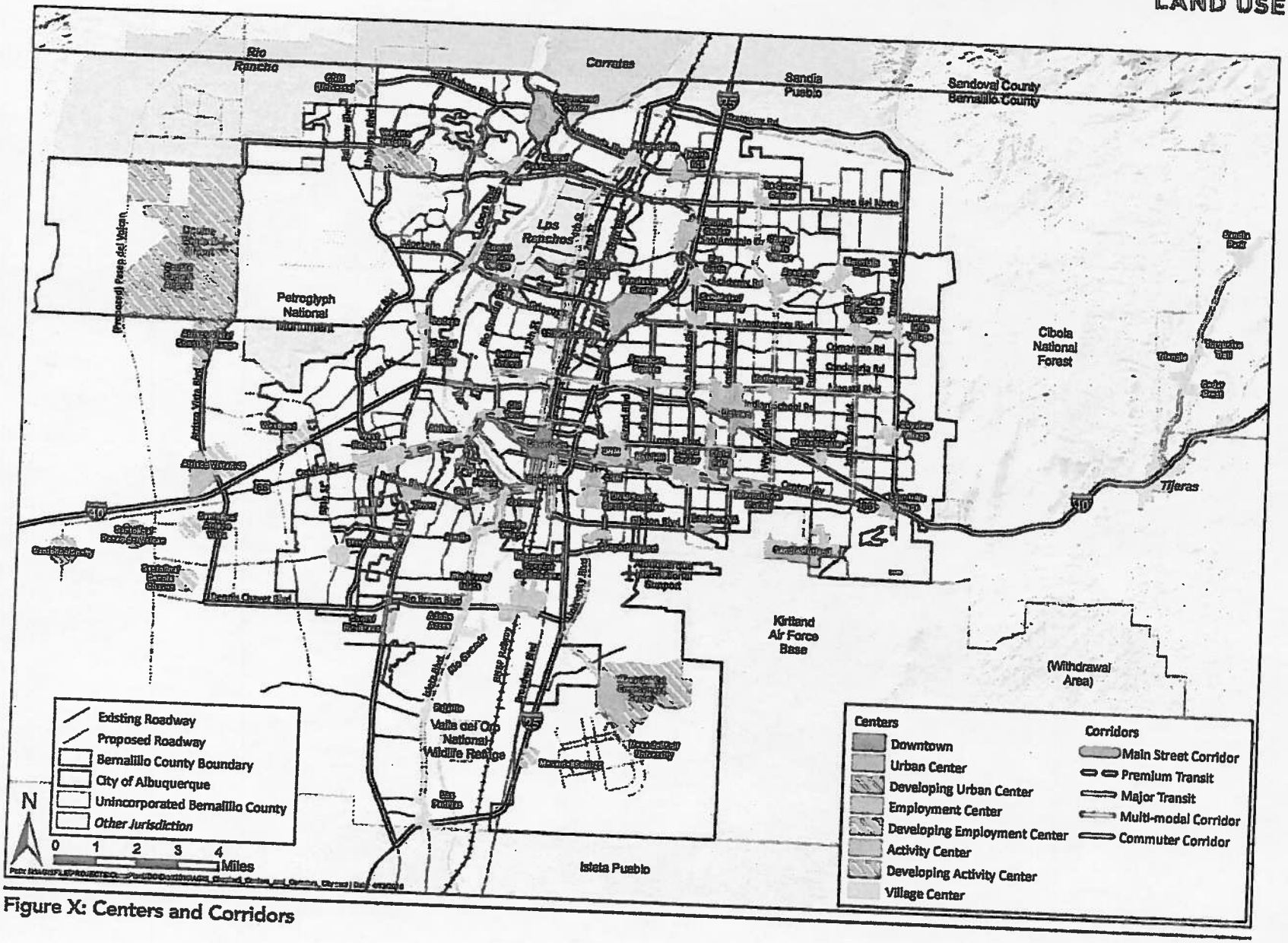
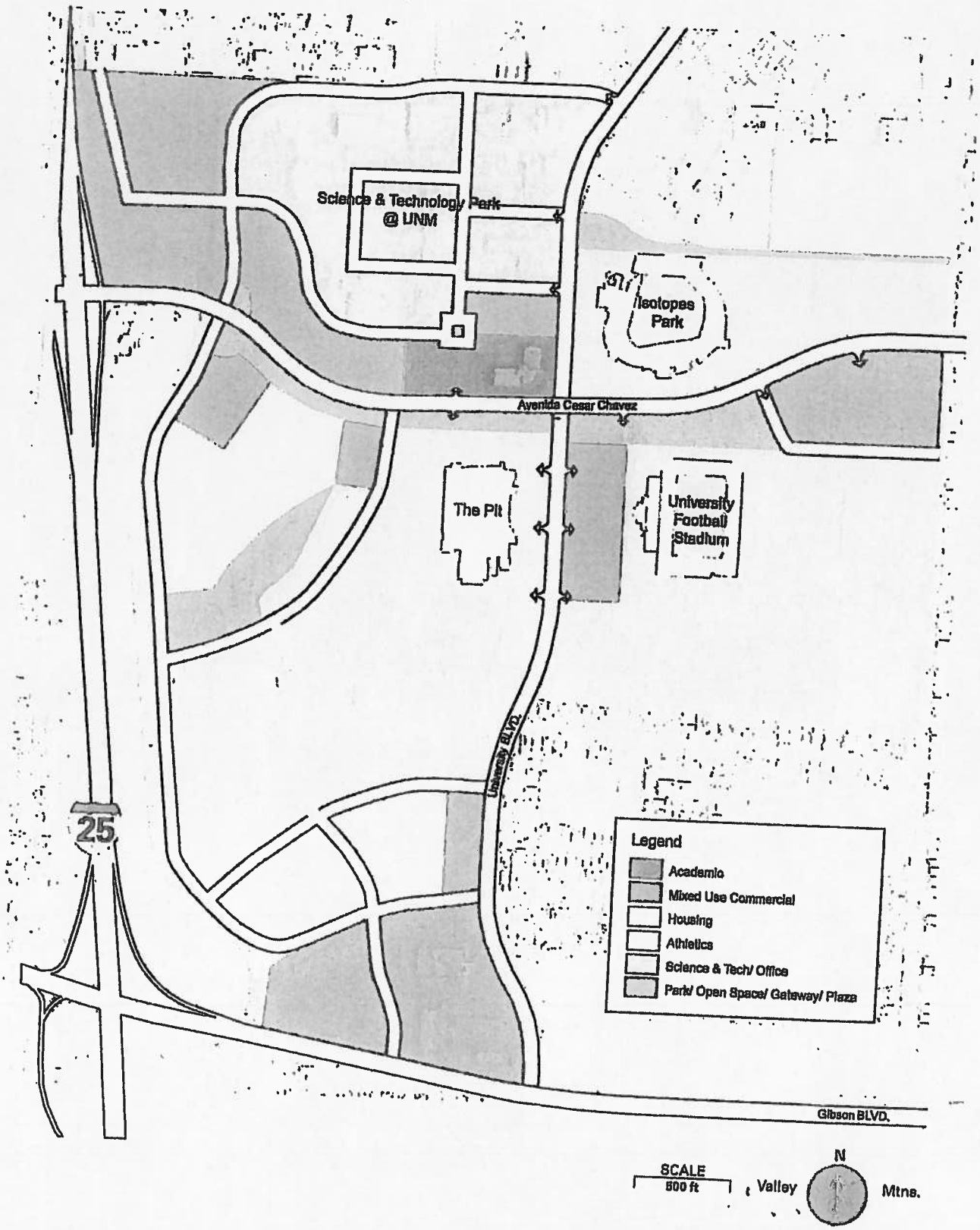


Figure X: Centers and Corridors

Exhibit "D"

Land Use

The land use pattern illustrated in the diagram below is based on the overall master plan program needs, opportunities for public private partnerships and a desire to create a cohesive campus environment.



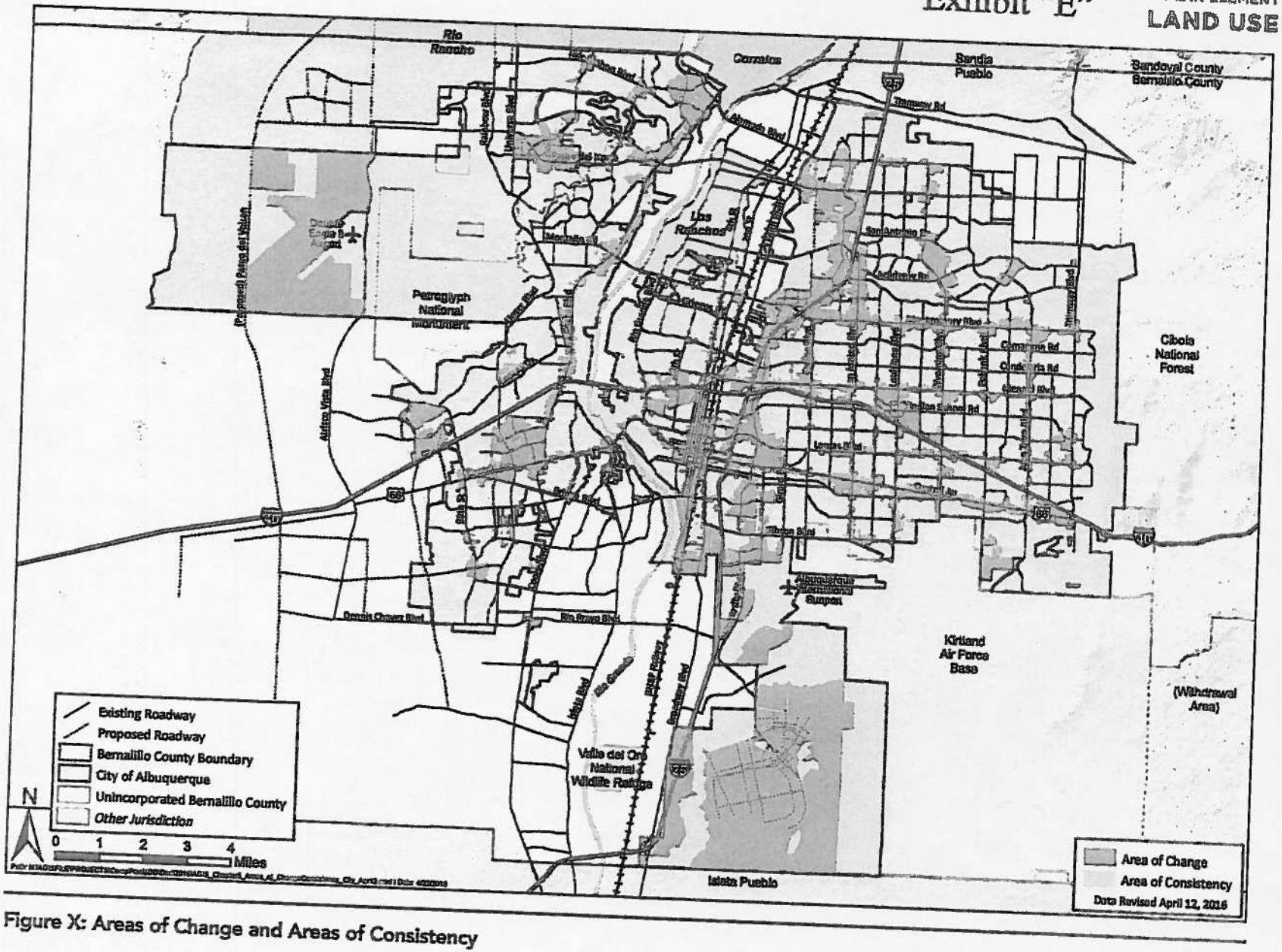


Figure X: Areas of Change and Areas of Consistency

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Kim D. Murphy, Principal
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July 22, 2016

Chair Karen Hudson, Environmental Planning Commission
c/o City of Albuquerque Planning Department
600 2nd Street NW
Albuquerque, NM 87102

RE: Official EPC Comments on the ABC Comprehensive Plan
Representing Institutional Clients: General

Dear Chairperson Hudson,

I have been following the ABC-Z Project, encompassing both the Comprehensive Plan Update ("Plan" or "CPU") and Integrated Development Ordinance ("IDO"), on behalf of several large institutional property owners in Albuquerque since mid-2015. This is a very complex and important undertaking with far-reaching implications for growth and development with significant impact to all property owners and users.

I have submitted a number of written memos to the ABC-Z Team providing comments on previous CPU Drafts. These comments have been both general, dealing with the broad application of the principles and policies of the Plan, and specific, in terms of their application to my client's property. While I won't re-state all these comments, I appreciate the opportunity to summarize several overarching remaining concerns with Plan.

A separate, companion memo of this same date has been submitted to the EPC that addresses an inconsistency in the Development Area designations involving the Albuquerque Academy Property, which we believe is the result of a mapping error in the AGIS Data Base and lack of appropriate consideration given the Academy Master Plan. Additionally, a separate memo to the ABC-Z Team dated June 20, 2016 on behalf of the University of New Mexico recommends the expansion of the Employment Center designation for UNM South Campus-CNM Main Campus and the designation of this expanded Employment Center as an Area of Change. Today, a copy of this memo is also being submitted to the EPC for its consideration.

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I sincerely support the goals and objectives of the ABC-Z Project in order to:

- Improve opportunities for economic development and job creation
- Protect established neighborhoods
- Streamline the development review and approval procedures
- Promote more sustainable development

However, in my many, many hours of review/study of the various versions of the Plan, while I have noted many statements which support these goals and objectives, several high-level concerns and questions remain which appear to conflict with them.

As mentioned above, I have provided the ABC-Z Project Team (staff and consultants) written comments on a number of occasions during the Plan process. While certain of these comments have been addressed in the EPC June 2016 Draft, many have not. Since further testimony many be disallowed, I am taking the time to note these prior communications and enclose copies, in the interest of completeness with respect to the public record:

- *General Comments (CPU, January Draft) dated February 25, 2016*
- *Section Comments (CPU, January Draft) dated March 11, 2016*
- *Policy Comments (CPU, January Draft) dated March 11, 2016*
- *Development Areas Comments (CPU, April Presentation Draft) dated April 20, 2016*
- *Land Use Section Comments (CPU, May Draft) dated June 21, 2016 Revised*
- *General Comments (CPU, May Draft) dated June 24, 2016*

In addition to the foregoing written communications regarding the CPU Drafts, I have also provided comments on the IDO Modules 1 &2 in a memo dated June 2, 2016.

Overarching Concerns / Questions:

1. The Comprehensive Plan is intended to "guide private development land use decisions" and "has the power to shape land use and zoning decisions" (Section1.3). The CPU and IDO are closely connected in the ABC-Z Project. What the function and relation of the documents vis-à-vis use of private land? As merely a "guide", what about the concern that the Comprehensive

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Plan transitions into a land use regulatory document, as some statements in the current draft suggest?

2. Related to the foregoing, how will the CPU be amended to reflect desired changes in growth patterns and land use, specifically with respect to Areas of Change, Areas of Consistency and Centers & Corridors? Chapter 14: Implementation, which was only made public very recently with the EPC June 2016 Draft, addresses public polices, strategies and actions only. How will private landowners propose modifications to the Plan, and further its policies, particularly in instances when future circumstances conflict with Plan guidance?

3. Eliminating current Area Plans and Sector Plans in favor of one comprehensive policy document is laudable. However, incorporating virtually all land use policy statements from those plans creates an unwieldy, massive document. It also creates situations where policies uniquely created to address a particular local issue are applied broadly. I have suggested previously that many of these policies are better suited as "placeholders" in to-be-completed Community Planning Area Assessments, which will be the subject of more focused review in the future.

4. The Comprehensive Plan identifies Areas of Change as the primary areas for accommodating new growth and development, which includes designated Centers & Corridors. However, the EPC June 2016 Draft places great emphasis on Centers & Corridors as the principal form of that new growth and development and gives short shrift to other portions of Area of Change. While development should be encouraged in Centers & Corridors, over-emphasis on this form is too limiting.

5. Emphasis on high-density residential and mixed-use development ignores MRCOG projections which show that, while the growth rate of multi-family housing is expected to exceed that of single-family housing, about two-thirds of new housing growth by 2040 will be single-family. And, since the Plan prohibits single-family housing in Centers & Corridors, where will this new growth occur?

6. The Plan discusses the need to encourage "infill" development and denounces "sprawl" or "fringe" development. While public policies that support infill are important and necessary, it should be acknowledged that SB 241 adopted in 2003 limits the City's ability to annex land without approval of the County. The implication of is limitation is that the City's

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municipal boundaries are constrained, and may be so in the future, such that by 2040 (the time fame of the Plan) a large portion of the available City land may be "built-out" and at some point the City may become "land-locked" by other jurisdictions. Therefore, it's vital that the City have reasonable, accommodating and market-driven plans and policies to deal with new growth, development and re-development. If they become, or perceived to be an obstacle, new growth will shift to surrounding jurisdictions and the City will be burdened with the adverse regional consequences (traffic, air pollution, economic & tax base erosion, etc.) of development beyond its borders.

Thank you for your consideration of these important issues.

Respectfully,

Kim

Kim D. Murphy

Altura Real Estate, LLC

Kim D. Murphy, Principal
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To: ABC-Zone Team

From: Kim Murphy KDM

Date: February 25, 2016

RE: General Comments: ABC Comprehensive Plan ~ Public Draft (January 2016)

Thank you for the opportunity to comment on the 2016 Comp Plan Update Draft. While I appreciate very much the approach to the CP Update and agree with the overall concept and policy structure, I've noticed some inconsistencies and areas for improvement, which I have outlined below. These comments are based on over 25 years real estate / development experience in Albuquerque, initially as UNM Director of Real Estate and most recently as a private development consultant following my retirement from UNM, and includes my tenure on the EPC during the mid-1990's.

The general comments which follow, and the section-specific comments which are contained in Attachment "A", reflect my review of Chapter 1- Introduction through Chapter 9- Housing, exclusive of comments on goals, policies and actions contained within these sections. Review of the remaining Chapters 10 through 13 will be addressed in a follow-up memo prior to the March 11 comment deadline, as well as specific comments on all goals, policies and actions. Note that as used here, page references appear as "5-3" for example.

First, and most important, is the overall length and complexity of the document. Currently, the Plan is approximately 450 pages, without an Implementation Section, Plan-monitoring Section and Appendices, which may push the length to well-over 500 pages. This length of document could easily intimidate even the seasoned development professional, and most certainly the average citizen. Clearly, the decision to incorporate all land use and development-related Rank 2 Area Plan and Rank 3 Sector Plan policies has contributed to the overall length. One solution might be to incorporate policies and actions for "small area" plans into an appendix organized by Community Planning Area as a "placeholder" for follow-up planning efforts. Additionally, efforts should be made to "layer" the information in final editing so the essential concepts and most vital information is readily accessible.

Second, is policy and action redundancy and excessive (my opinion) policy cross-references, a situation which may be related to the concern mentioned above. A fair assumption is that the Comp Plan should be read as a whole; therefore repetition and cross-references should be eliminated except only where absolutely necessary.

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Third, is the use of inconsistent terminology, likely related to the inclusion of policies from Rank 2 and Rank 3 Plans. While many of these references relate to excerpts from previously adopted policies which contain "old" terminology, in many cases this old terminology has crept into the CP narrative, which can cause confusion, like the use of Activity Centers (5-7 as example) and reference to Far West Mesa (5-41), among others.

Fourth, is that in the desire to move forward with public review of the CP Draft, important information has been omitted, but "flagged" for later inclusion. Examples are: a) maps and charts related to constraints to future growth (page 2-4), b) map of land available for development (page 5-4), and c) map and chart related to areas of consistency and change. Having an opportunity to review these items would enhance understanding of the Plan recommendations.

Fifth, while the Plan states: "the Comp Plan's goals and policies must be broad and adaptable" (page 1-6), the current draft in some cases is far from this objective. Again, and most likely related to the first concern above, too often very specific and detailed policies and actions have found their way into the document, e.g. sidewalk widths (6-17), bike lane widths (6-38), street furniture requirements (6-41), transit map stations (6-36) and perimeter wall opening requirements (7-8), just to name a few.

Sixth, in several places the Plan provides historical and cultural context, particularly in Section 4B Neighborhood Character (4-9). Some (perhaps most) of this material has likely been copied from other Plans. However, it might be timely to "fact check" this information. Several obvious errors, such as definition of "Tijeras" (should be crossing canyons, not major roads) and location of Sandia Peak Ski Area (east side of mountain, not west) are indications that careful review is needed.

Seventh, the differences in Development Areas land use typology and policies between the City (Consistency & Change) and the Unincorporated County (Urban, Semi-urban, Rural & Reserve), as well as differences in approach to sub-area planning (Community Planning Area Assessments for City and Sector Plans for County) seem to suggest that the "bright line" delineation between the City and the Unincorporated County as it exists today will continue into the future. If so, what are the public policy implications (service, fiscal, political, etc.) for each governmental entity.

Eighth, while the CP states that the "growth vision" and resulting policy framework, both for the City and the County, is supported by the MRCOG 2040 Metropolitan Transportation Plan (Sections 1.F.3 and 2.D.4), major differences are apparent. The CP relies on much of the aggregate data contained in the MTP's 2040 Socioeconomic Forecast, but seems to ignore the land use implications of the Forecast allocations by over-emphasis on high-density residential and mixed-use development. While these are important and beneficial new development trends which should be encouraged, the CP

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states that by 2040 61% of new housing units will be single family, only slightly less that the current SF ratio of 63% for the City and substantially less than the current SF ratio for the Unincorporated County of 78%. Admittedly, the CP goes on to state that many of these SF units will be located in a "mixed-density setting", presumably with townhome and multi-family units (Section 9.B.3). However, the CP acknowledges that SF densities are not appropriate for Centers & Corridors, as the desired focus of new development (Policy 5.1.1). Since by 2040 the County as a whole is projected to add approximately 95,000 single family units (Section 9.B.3), which could translate into about 20,000 acres of additional residential land use, the question becomes: where will this growth reside if not in some fashion within Centers & Corridors.

Ninth, related to the point above, the role of Master Planned Communities in accommodating new development for both the City and the Unincorporated County is grossly understated in the CP, particularly when compared to the 2040 MTP Preferred Growth Scenario. With the exception of policies that relate to Master Planned Communities as alternate development approaches in Reserve and Rural areas of the County, only passing reference is made to already approved planned communities, such as Mesa del Sol (2008), Westland (2009) and Santolina (2015). The importance of accommodating new growth in these approved Master Planned Communities merits greater focus in the Comp Plan.

Tenth, lastly and most important, is the pivotal role of economic development in the Comp Plan (Section 8). While the document states that economic development is a "key factor" in the CP, the Plan relies mostly on general statements of "national and regional trends" (Section 8.A.1). Almost no mention is made of the MRCOG 2015 Comprehensive Economic Development Strategy. Efforts by the City, County, State, UNM, CNM and other institutions, working with the private sector, to "connect the dots" between marketable ideas, technology, venture capital, management and workforce development bears more attention in the Plan. Finally, given the emphasis on improving the jobs-housing balance west of the Rio Grande, this section seems to avoid meeting this challenge head on, and instead focuses on Downtown as a "regional employment center" (Policy 8.1.3), certainly an important policy goal, but only one of many designed to link employment and housing in order to lessen traffic impacts within the region.

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To: ABC-Zone Team

Attachment "A"

From: Kim Murphy

Date: February 25, 2016

RE: Section Comments: ABC Comprehensive Plan ~ Public Draft (January 2016)

Chapter 1 Introduction

Natural setting, culture and history are important factors in the settlement and growth of Albuquerque, but so are post WW-II military installations and national lab research, tourism and regional trade (1-1).

Clarify "metropolitan area" (1-1). MSA population estimate for 2015 is 907,679. Each jurisdiction, including MRCOG, measures differently.

Describe Plan Ranking (1-2, 1-5 and 1-6).

CP will also be used by AMAFCA, RMRDT, BC & State Environmental Health, as well as several federal agencies (1-3).

Growing local and small business are just one aspect of improving economic opportunities (1-6).

Statement that 2014 CP does not add any centers needs to be checked (1-7). Vision Map shows four new Urban Centers, and the NE Quadrant of the City only contains two (see Vision & Land Use comments below).

Comp Plan should emphasize only the "overarching" City and County policies. Policies relevant to only "small areas" should be "parked" in an appendix related to Community Planning Areas for further assessment.

Chapter 2 Factors of Growth & Development

Introduction Sections to both Chapter 1 and/or 2 would benefit from a brief discussion about the role of BC and COA in the growth and development of the region, particularly as defined by MRCOG in 2040 Socioeconomic Forecast. This would set the context for the data presented. For example, in 2012 the MRCOG "region" had population of

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915,316, of which BC accounted for 74%. And in 2015, COA represents about 82% of BC population. MRCOG population projections for 2040 indicate that BC will capture about 68% of the "regions" new growth. Also, the MRCOG map of population growth by DASZ (2012-2040), although not tied graphically to CP land use designations, presents a reasonable picture of where growth pressures are likely. Finally with respect to employment, MRCOG projections indicate that BC in 2040 will have 72% of the region's population, but 81% of the employment, while according to the Comp Plan Draft (5-4) the City's share of BC employment in 2014 will be 87%, which illustrates the City's role in regional economic development.

Development history of the region is understandably general, but lacks clarity. Also, a few statements are incorrect, such as timing of interstate road development and rate of growth since 1970. (2-1).

Table showing population growth (1900-2000) is already 15 years out of date (second page 2-1).

Statement indicating that population "slowed down" since the expansion of transcontinental railroad and end of WW II is grossly incorrect. Further, these events should not be lumped together as they span a period of 50 or 60 years in NM. Also, rather than cite only rates of growth, it may be better to include actual increases, such as from 1950 to 1960 County population increased by 116,500, and from 1970 to 1980 by 105,500 (second page 2-1).

Table showing change in generations (2000-2013) is confusing. Something's not right. (2-2).

Regional growth rate thru 2040 should be 46% not 40% (2-6).

Cite source for table showing future balanced housing profile and table showing housing affordability (2-8). Same table occurs on page 9-10.

Chapter 3 The Vision

Vision Map adds several new Urban Centers, which may be justified (map follows 3-3); however, please include rationale. Also, note that only two Urban Centers are identified in the NE Quadrant of the City, i.e. north of I-40 and east of I-25 (area of considerable population/employment), while six are located in the SE Quadrant and seven in the NW Quadrant. Are there opportunities for "emerging" Urban Centers in the NE Quadrant, particularly those that include employment, community facility uses?

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Chapter 4 Neighborhoods

Describe difference, if any, between Small Area Assessments (4-1) and Community Planning Assessments (4-6).

Define "complete communities" (4-3). Any examples?

Discussion concerning Areas of Change vis-à-vis neighborhood character seems to add a requirement that development proposals demonstrate financial viability and that they are "practical" for investment (4-5). The real estate marketplace determines feasibility.

In several places, the CP Update is referred to as 2015 Comp Plan (4-6), and elsewhere as 2016 Comp Plan. Needs to be consistent.

For the City, requiring assessments of all 13 Community Planning Areas over a 4-year period mean one every 3-4 months (4-8). Is this practical?

Neighborhood Character Descriptions (beginning on 4-9) should be reviewed carefully for accuracy, e.g. Volcano Mesa (?) as "major mixed-use" district (4-25).

Chapter 5 Land Use

Introduction to Ch.5 should include a brief discussion, in general terms, of the development patterns over the past 10-15 years, particularly since the adoption of "Centers & Corridors" Policy in 2003. In particular, how successful has the Comp Plan been in accomplishing its objectives? And, what role has infill and master planned communities served in accommodating this growth? There are numerous "success stories".

According to MRCOG the County is expected to grow by 46% not 40% by 2014 (5-4).

Plan indicates that the statement that "one-third of City is buildable, vacant land" will be supported by map or chart (5-4). This support is very important. MRCOG map showing "Population Growth by DASZ, 2012-2040" from Socioeconomic Forecast may be useful also.

Statement that there are no new centers is incorrect (5-6). There are four new Urban Centers and consideration should be given to adding a new Urban Center the NE Quadrant located north of I-40 and east of I-25, which has only two according to the Plan.

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Cibola National Forest boundary on map following page 5-12 appears incorrect for the area south of I-40 at Sedillo.

Development Areas discussion beginning at Section 5.A.6.3 (page 5-11) from subsection 5.A.6.3.1 through subsection 5.A.6.3.10 (page 5-21) is confusing. Better organization is needed. Also, the section ends with what appears to be repeat of Areas of Change and Areas of Consistency. Why?

Chapter 6 Transportation

Define "complete neighborhoods" (6-2). Are there good local examples?

Statement that younger people "have less desire to drive" and baby boomers are "retiring and making new housing choices" (6.3) needs explanation, particularly with respect to causes and location preferences. Both these "trends" contain economic and lifestyle factors that may change over time.

Define "complete streets" (6-4). Are there good local examples?

Chapter 7 Urban Design

Chapter 8 Economic Development

Current unemployment rates for BC should be used (8-5). And the statement that the NM rate is only "slightly" higher that the national rate is a stretch.

Discussion of factors that are not relevant to the CP is not enlightening (8-7).

Discussion of "talent" seems overly general and lacks relevancy (8-8).

Statement that federal sequestration in 2008 resulted in a loss of 20,000 jobs should be checked (8-11).

Statement regarding "greenfield development on the edge of the urban footprint" as compared to job growth shaped by centers and corridors (8-19) presents a false image. As the map that follows page 8-17 illustrates, the vast majority of region's employment is located in or near the urban core and not at the urban fringe.

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Chapter 9 Housing

Acknowledgement that "most homes will still be single-family" (9-2) seems to conflict land use policies related to centers and corridors, which discourages single-family (Policy 5.1.1).

Map illustrating Housing and Transportation Costs as a Percentage of Household Income on page 9-8 does not make any sense. Something is wrong, e.g. High Desert/Sandia Heights households pay more than 87% of family income (?).

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To: ABC-Zone Team

From: Kim Murphy KDM

Date: March 11, 2016

RE: Section Comments: ABC Comprehensive Plan ~ Public Draft (January 2016)

The following is a continuation of "section" comments on the ABC Comprehensive Plan Draft dated January 2016. Previously, on February 25th, section comments were submitted to the ABC-Z Team for Chapter 1 (Introduction) through Chapter 9 (Housing). This memo address comments on Section 10 (Parks & Open Space) through Section 13 (Infrastructure, Community Facilities & Services).

Chapter 10 Parks & Open Space

In general, this section comes across very disjointed and confusing. It's unfortunate because both the City and the County (citizens & elected officials) should be proud their efforts in acquiring, developing and managing parks and open space and many count these programs as one of the community's great success stories. Additionally, both the City and the County have been leaders for many decades in leveraging their resources with other public agencies- local, state and federal, to expand and enhance park and open space opportunities. The Comp Plan should reflect this level of cooperation and accomplishment, while providing a roadmap for the future.

Introduction Section addresses open space almost entirely; parks and recreation are barely mentioned.

Subsection 10.A.2.3.2 under Guiding Principles, states that "recreation-based business" will "generate funding" for public lands. Is there a specific proposal in mind?

Parks Overview (10-3) seems to be critical of the historic practice "since 1948" of requiring residential development to dedicate land for neighborhood parks and flatly states that "the number and location of neighborhood parks now inadequately serves the area's population". These statements do not reflect my personal experience growing up in ABQ dating from1958, and that of my extended family, and should be checked and supported by data with appropriate benchmarks.

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This subsection goes on to state that the ratio of parkland to population "compares poorly with other cities of similar size" (10-4). Again, this statement should be supported.

Discussion regarding Rio Grande Valley State Park on page 10-4 seems out of place as this is really more akin to open space.

Discussion regarding park "co-location" (10-4) could use some recent, local examples.

Subsection on Bernalillo County Parks and Recreation (10-5) should mention the Mesa del Sol Regional Park.

The Metropolitan Parks and Recreation Advisory Board is mentioned on page 10-5. Is this City, County or joint?

Open Space Overview (10-7) is a jumble of figures and lacks appropriate context. It concludes that we've done a poor job acquiring open space land since 1985 by pointing out that the ratio of open space land to population (1000's) has dropped from 51.5 to 43 today, citing increasing population and "few and smaller land acquisitions". This doesn't sound correct and the "high" ratio in 1985 may just be a consequence of the large amount of land acquired prior to 1985. But if the trend is of concern, it should be supported by data with appropriate benchmarks.

Cooperative managed, significant open space (10-8) should mention the County's contributions to Valle del Oro NWR, as well as by AMAFCA.

Subsection 10.A.6.3.2 (page 10-11) combines City and County information, when the subsection is headed "City", and should be parallel to the previous subsection titled "County".

Chapter 11 Heritage Conservation

Comments pending.

Chapter 12 Resilience & Sustainability

Guiding Principles (12-2) need greater focus. They have little in common with the clear, concise statements in Challenges & Strategies (12-3).

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Sustainable Growth (12-4) should recognize the role of Master Planned Communities, such as Mesa del Sol, in accommodating growth as another model of sustainable development, in addition to centers & corridors.

Managing Our Water Resources (12-6) should:

- Expand on our current reclaimed water system (12-7) to stretch our water supply
- Elaborate on second sentence of second full paragraph on page 12-7: "Demand is lower, and supply is increasing, and is projected to continue..".
- 2016 WRMS develops 3 demand scenarios (12-8) for 2014 to 2130, a period of 114 years. "Low demand" indicates a 0.5% annual water use growth; while, "high demand" suggests a 0.9% annual water use growth. Population and demand assumptions would add meaning.
- Discussion of 2016 WRMS stops abruptly and shifts to another topic. Maybe a "teaser" or "placeholder" is needed.

Threats to Water Supply (12-8) should expand discussion of development patterns, particularly the "direct link" between water consumption and residential lot size. This seems to support the trend toward higher density single family development. Historical patterns in ABQ for SF lots size over the past 20 years would be enlightening.

Discussion in Water Supply Strategies (12-12) on "Low Impact Development" and "Green Infrastructure" should focus on current local strategies and implementation successes.

Natural Resources (12-14) mentions 'threats" but fails to point out many of the community successes achieved through sound public policy and political leadership, such as trend toward "natural" arroyos, improved water conservation, better air quality, solid waste recycling, etc.

Entire section on Resilience (pages 12-16 thru 12-29) does an injustice to the various technical research studies and adopted plans in the areas of climate change & risk assessment, drought management, natural hazard mitigation, wildland urban interface for ABQ and Central New Mexico. This section fails to adequately recognize this good work by highlighting areas where we are incorporating these recommendations into public and private lives, and in fairness, pointing out where we are falling short of the mark.

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Chapter 13 Infrastructure, Community Facilities & Services

Please see policy comments on this section. No additional comments at this time.

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To: ABC-Zone Team

From: Kim Murphy KDM

Date: March 11, 2016

RE: Policy Comments: ABC Comprehensive Plan ~ Public Draft (January 2016)

General Comment

Consolidation of policies from Rank 2 Area Plans, Rank 3 Sector Development Plans and Corridor Plans with those of the Comp Plan Draft ("CP"), while "putting all policies in one place" does not improve clarity. It only serves to make the CP even more opaque and inaccessible. While the CP notes that the intent is to "ultimately" organize area-specific policies by Community Planning Area ("CPA"), this effort should be incorporated with this CP Draft and not put off to later.

The opening narrative of each Chapter (content and format), beginning with the Introduction, followed by Guiding Principles and the Future Vision, ending with Challenges & Strategies, serves the reader well by bringing much-needed focus to the important elements of each topic. However, the understandings, insight and focus gained is undermined in the policy & action statements by mixing City-wide, area-specific and even design-level considerations. The user is given the impression that all have equal importance, and is left to sift through page after page of policies (37 for land use & 38 for transportation) for the important "big ideas".

A final point, the consolidation of policies from other plans has created almost mind-numbing repetition, both within individual Chapters and among them as well. One example: the importance of establishing appropriate pedestrian connections must be mentioned hundreds of times in the CP Draft. Excessive repetitive references eventually make one blind to the message attempting to be conveyed.

This memo is a follow-up to that submitted previously dated February 25th addressing General Comments and Section Comments (Chapters 1 thru 9) included as Attachment "A". A final memo with today's date is also being submitted addressing Section Comments (Chapters 10 thru 13). All three (3) memos constitute comments from the author through the March 11th comment deadline. Additional comments may be suggested at a later date.

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Chapter 4: Neighborhoods

Goal 4.2 Complete Communities

Policy 4.2.4

Action 4.2.4.1: Workforce Housing Trust mentioned again on page 9-11 as well, but may need elaboration. Also see Policy 9.5.1.

Policy 4.2.6 Define "locally unwanted land uses"? Mentioned again in Chapter 12 on page 12-15 with respect to waste management facilities.

Goal 4.6 Area-Specific Policies

Policy 4.6.1 thru 4.6.4: Policies are too specific and prescriptive for inclusion in CP.

Chapter 5: Land Use

While the City Development Areas, specifically "Areas of Change" appear to include areas covered by City-approved Master Planned Communities ("MPC"), such as Mesa del Sol, its seems appropriate to recognize the importance of MPC by designating MPCs as a separate Development Area category and specifically provide goals and policies for approved Master Planned Communities, which would provide a more appropriated context for Centers & Corridors policies.

Goal 5.1.1 Centers & Corridors This entire section appears to address development within the City only, with the exception of Policy 5.1.5 (Village Centers). However, "centers & corridors" exist within the Unincorporated County as well according to Vision Map.

As an aside, how is Village of Los Ranchos dealt with in CP? Only mentioned briefly in Chapters 12 & 13. Note that Village is included in MRCOG and ABCWUA.

Policy 5.1.1c) Broad statement that single family detached housing should be "discouraged" in centers & corridors is not reasonable or practical, given that 84% of new housing thru 2040 is estimated to be single family, according to MRCOG. Further, statement is not supported by footnote references to current CP.

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Policy 5.1.1f) General policy statement is probably OK. But subsections thereunder are too specific, especially reference to design issues.

Policy 5.1.3 Urban Centers occur in County as well, not just City. Why callout "west side" in subsection e)? Footnote references 39 thru 43 are incorrect.

Policy 5.1.4 Applies to County as well. Define "locally-oriented services" and "neighborhood-scale".

Policy 5.1.5 Can Village Centers occur in the City, such as near North Valley?

Policy 5.1.6 Any good local examples of Main Streets? Subsection d) appears to require Main Streets to be served by transit. Is this too limiting? Should this be "multi-modal transportation" instead?

Policy 5.1.9 Associated "action item" references "Second Street north of Lomas". Too specific?

As an aside, Commuter Corridors on Vision Map (appear to "feed" I-40 and I-25? Is this the concept?

Goal 5.2 Regional Identity

Policy 5.2.1 Understanding how economic development drives land use patterns and development forms is extremely important. Needs more focus.

Policy 5.2.2 Seems out-of-place. Just one element of regional identity.

Goal 5.3 Distinct Communities

Policy 5.3.1 Not sure what this means.

Policy 5.3.4 What does "promote community ownership" mean in action item #1? Is "daily needs" in Action #3 too limiting?

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Goal 5.5 Jobs-Housing Balance

Policy 5.5.2 Other than appropriately zoned land, what factors or elements are essential to increasing jobs west of the Rio Grande? Finding other ways to accomplish this goal is important. See Policy 13.1.1c) on page 13-24 allowing exceptions for "employment growth", as well.

Goal 5.6 Development Areas

Structure of this very important policy section is awkward, beginning with open space, then dealing with conservation techniques, then County Development Areas (Reserve, Rural, etc) and ending with City Development Areas (Consistency & Change). Restructuring seems in order. Also, adding a new Development Area designation for Master Planned Communities ("MPC") should be strongly considered.

Policy 5.6.2 Addressing West Side Design Guidelines may be too specific for CP. Either generalize concept or move to CPA(s).

Policy 5.6.4 Delete reference to City in subsection a)ii which relates to Reserve Areas in Unincorporated County only.

Reference to Developing Urban Area in subsection a)iv. What is this?

Does County have "transfer of development rights" ordinance as referenced in subsection b)i.?

Action 5.6.4.7: Addresses issue that should be negotiated in Planned Community development agreement.

Action 5.6.4.12: Addresses specific conditions of Planned Community approvals that should be negotiated in development agreement. Also reference to "Far West Mesa" should be changed to correspond to applicable County CPA.

Policy 5.6.5 Reference to "rural villages" in subsection a)v – is this the same as Village Centers?

Change reference in subsection a)vi from "East Mountain area" to applicable County CPA. Statement in same subsection regarding infrastructure "provided at the cost of

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developers" should be modified to "at no net expense" consistent with Planned Community Criteria.

Policy 5.6.7 Several Actions appear related to development within City, such as 5.6.7.7, when this is identified as a County policy. In other cases, they seem to address a level of detail not appropriate for CP.

Policy Subsection p) and action #19 address several financing techniques for public improvements, including TIDD, but in a very limited fashion. Needs more focus.

Goal 5.7 Process

Policy 5.7.1 Reference to Small Area Assessments for CPA and Indicators in Monitoring Plan relative to "Planning Ordinance" Update needs clarification. Also, should not the term "Community Planning Area Assessments" be used instead of "Small Area Assessments?

Policy 5.7.6 Stated objective to "Provide easy access to information and the Comp Plan.." requires better execution.

Chapter 6: Transportation

Goal 6.1 Land Use-Transportation Integration

Policy 6.1.1 Uses antiquated terminology: urban, suburban, rural, etc. related to current sub-CP plans. Since the goal is the "support the planned character of existing and future land uses", should we not use the current proposed land use terminology (centers & corridors)?

Policy 6.1.2 thru 6.1.6 Deals with street design and improvements for each corridor type. What are the implication for the various "center" types (if any), which would be addressed in Policy 6.1.1?

Goal 6.2 Context

Policy 6.2.1 & 6.2.3: Seems like there should be more to context than natural terrain, view corridors, streetscape and pedestrian/bike access. See Policy 12.1.3 on page 12-34 for other possible considerations.

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Goal 6.3 Multi-Modal System

What's meant by "vulnerable transportation modes"?

Policy 6.3.2 Seems like this relates more to Goal 6.1.

Action 6.3.2.1: Who would be responsible for creating Transportation Management Association?

Policy 6.3.3

Action 6.3.3.1.1 requires "pathways through cul-de-sac heads". Too detailed as design matter.

Policy 6.3.4

Action 6.3.4.1 recommends "transit feasibility & access analysis" as part of TIS for development in Centers & Corridors, as well as "transit-friendly" design. Further guidelines and standards are needed.

Subsection iii) requires Transportation Management Association. Who would be responsible for creating?

Actions 6.3.4.1 thru 6.3.4.18: Most of these are public responsibilities and should be identified as such.

Actions 6.3.4.11, 6.3.4.14 & 6.3.4.18: Too detailed for CP.

Policy 6.3.5 Design standards for bike routes and lanes (6.3.5.4 thru 6.3.5.6) are inappropriate level of detail for CP.

Policy 6.3.6

Action 6.3.6.2c): Clarify point.

Goal 6.4 Safety

Policy 6.4.3

Action 6.4.3.2: This is a design issue.

Goal 6.5 Public Health

Policy 6.5.3 Clarify point.

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Goal 6.8 System Effectiveness / Coordination

Policy 6.8.4 Seems to require a "cost-benefit" analysis for public infrastructure, with "no net expense" standard for certain areas. Is this justifies and/or appropriate?

Goal 6.10 Specific Corridors &
Goal 6.11 Specific-Area Priorities

Entire section under 6.10 and 6.11 are area- or corridor-specific and should be moved to appropriate CPA(s).

Chapter 7: Urban Design

Goal 7.1 Coordination of Land Use and Transportation

This entire section appears to be repetitive of Land Use Policies and Transportation Policies.

Goal 7.2 Pedestrian-Accessible Design

Policies 7.2.1 thru 7.2.4: Seem reasonable; however, many subsection policies thereunder are too specific and prescriptive for inclusion in CP.

Goal 7.4 Parking

Policy 7.4.1 Implies that on-street and off-street parking will become centrally managed by City.

Policy 7.4.3 Subsection f) encourages "reverse-angle" parking. Any local examples of how this works?

Goal 7.5 Sustainable Infrastructure

Policy 7.5.2 Bold statement.

Action 7.5.2.2: What are "Rainwater Design and Management Standards"?

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Goal 7.6 Priority Elements and Design Types

Policy 7.6.1 Uses antiquated terminology: urban, suburban, rural, etc. related to current sub-CP plans. Should we not use the current proposed land use terminology (centers & corridors)?

Goal 7.9 Place-specific Policies

Entire section is area- or corridor-specific and should be moved to appropriate CPA(s).

Chapter 8: Economic Development

Goals 8.1 thru 8.4

Perhaps one day soon, when ABQ has a concise, actionable strategic economic development plan, these goals and policies can be updated with more focus.

Chapter 9: Housing

Goal 9.3 Density

Policy 9.3.1 Uses antiquated terminology found in current CP. Should we not use the current proposed land use terminology (centers & corridors)?

Also, given the fact that MRCOG projections indicate by 2040 only 26% of the new housing units will be multi-family units (therefor 84% will be single family), would it not be reasonable to allow high-density, small lot single family in Centers and Corridors as well?

Subsections relate more to Land Use and/or Urban Design.

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Goal 9.4 Homelessness

Is this all we have to say? Seems like this issue is concentrated in a few CPA(s). If so, these should be called-out for additional planning effort. Also, what does City's Heading Home Project and NM Coalition to End Homelessness have to offer?

Goal 9.6 Development Process

Policy 9.6.2 Would not every proposal qualify for "streamlined approvals"?

Goal 9.7 Partnership

Policy 9.7.4 Uses antiquated terminology found in current CP.

Chapter 10: Parks and Open Space

Goal 10.1 Parks

Policy 10.1.3.c What is the status of "private park development" approaches?

Policy 10.1.4 Actions 2 thru 5 relate only to CPA(s).

Goal 10.2 Open Space Network

Policy 10.2.2 Encourages provision of open space in Master Planned Communities, but Chapter 2 (Growth) and Chapter 5 (Land Use) fail to mention them as important locales for accommodating new growth.

Goal 10.3 Special Features

Policy 10.3.2 thru 10.3.4: Many of these Actions are too specific for CP and should be moved to appropriate CPAs. Additionally, several Actions have been completed, e.g. 10.3.2.5.

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Goal 10.4 Facilities & Access

Policy 10.4.1

Actions 8, 9 & 10 are too specific for CP and should be moved to CPAs.

Chapter 11: Heritage Conservation

Comments pending.

Chapter 12: Resilience & Sustainability

Goal 12.1 Sustainable Growth

Policy 12.1.1.b) Designating new "Activity Centers" should be largely a public planning process, which would arise from CPA Assessments in the City or Sector Development Plans in the County. As proposed this policy sets certain criteria and standards for establishing Activity Centers as if such is exclusively a private, landowner initiative. If criteria and standards are appropriate, they should be reasonable, after all, accommodating new development in "Centers" is to be encouraged. If not totally deleted, this subsection b) should be moved to Chapter 5 Land Use.

Policy 12.1.4 Refers to antiquated land use terminology.

Policy 12.1.5 & 12.1.9: Addresses CPA-level issues and are too specific for CP.

Goal 12.2 Water

Policy 12.2.1 & 12.2.2: Actions are either too specific for CP and should be moved to CPA(s) or have already been implemented, e.g. 12.2.2.1 and 12.2.2.3.

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Goal 12.3 Natural Resources

Policy 12.3.3 Mentions "tree protection ordinance" (12-41). Is this appropriate for CP?

Policy 12.3.5 Most of the subsections are either too detailed for CP or are out of date.

Policy 12.3.6 Addresses only the NW Mesa. Is this appropriate in CP or best in CPA(s)?

Goal 12.4 Resilience

Given the lengthy discussion in the narrative portion of this Chapter, only five polices are given and no actions. Also, several policies as written appear to be actions items.

Chapter 13: Infrastructure, Community Facilities & Services

Goal 13.1 Infrastructure Systems

Policy 13.1.2 Should be titled: "small-scale water and wastewater systems".

Policy 13.1.3 Deals with North Valley only. Should be moved to CPA.

Policy 13.1.9 Subsection c) addresses proposed West Side development "outside areas programmed for public infrastructure". How do these areas relate to Development Areas for both City and County?

Policy 13.1.11 Deals with Volcano Heights only. Should be moved to CPA.

Also, this is the only portion of the Comp Plan that specifically addresses public finance, specifically TIDD and PID, with respect to a particular development area. The whole matter of public

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finance needs greater focus in the CP. See Policy 13.4.4 for general statement regarding public-private partnerships.

Policy 13.1.12 Deals with "visual mitigation" of ABCWUA facilities. How is this a problem?

Goal 13.2 Community Facilities

Policy 13.2.3 Requires community facilities to be located in Activity Centers. What has been the "track record" since 2003 when Activity Centers were added to the CP. Any lessons learned?

Policy 13.2.6 Requires compliance with ADA. Has this been a problem in the past?

Goal 13.3 Public Services

Policy 13.3.1 & 13.3.10: Encourages location of community facilities and services in "activity centers and corridors". Should be expanded to include approved Master Planned Communities.

Goal 13.4 Coordination

Policy 13.4.4 Deals with public- private partnerships and financing for infrastructure that "supports" centers and corridors. Should be Expanded to include approved Master Planned Communities.

Subsection a) should be expanded to include TIDD and PID.

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Memo

To: ABC-Zone Team

From: Kim Murphy KDM

Date: April 20, 2016

RE: Revised CP Draft Comments (Partial)

The purpose of this memo is to comment on the Comp Plan Update ("CPU") revisions presented in the public information meeting on April 15, 2016. While the complete revised CPU is forthcoming, and thus will provide an additional opportunity review and comment, it would seem timely to mention several significant changes in the Plan in the vicinity of Albuquerque Academy that were announced last Friday, since these changes may be based in part on misinformation in the City's mapping data base.

At the outset, I wish to emphasize that the concerns addressed in this memo relate solely to the revised CPU *vis-à-vis* the current approved zoning and site master development plan for the Academy Property, and <u>are not based</u> on any new development under consideration. These concerns are especially significant due to the importance of the Academy Campus within the overall ownership area, and the desire by the Academy to preserve the integrity of current master development plan for the Campus and surrounding property.

First, as background, the Academy Property is currently zoned SU-1 for Planned Residential Development (Z-78-153), which was approved in August 1979. A table summarizing the current zoning totaling approximately 312 acres is shown on the attached graphic exhibit. Additionally, the entire Academy Property is subject to an approved Site Plan for Subdivision or Master Development Plan (Z-78-153-3) dated March 1990, based on the date of final DRB approval. This Master Development Plan is also shown on the attached graphic exhibit.

As the graphic exhibit illustrates, the southern portion of the Academy Property abutting Wyoming/Academy intersection is approved for Mixed Office & Residential Uses, with Incidental Commercial, up to a maximum 1.0 FAR (Tract A-2 containing 25.12 acres). A parcel designed Multi-family adjoins the Mixed Use parcel to the east and is approved for R-2 residential uses, up to a maximum density of 30 dwelling units per acre (Tract A-3 containing 13.15 acres). The remaining portions of the Master Development Plan are approved for a Townhome, Townhome/Single Family, Neighborhood Commercial and Park uses.

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The revised CPU presented publically last week indicates several important changes from the first CPU draft with respect to Areas of Change/Consistency which don't take into account the approved Academy Master Development Plan, and I suspect that this is due in part to misinformation located on the City's GIS Existing Land Use Map. This error may have caused a re-evaluation of the Academy Property based on revised criteria for Area of Change/Consistency designation.

Specifically, the City's GIS Existing Land Use Map shows the entire southerly portion of the Academy Property along Academy Blvd from Wyoming to Ventura as "Parks / Recreation", when in fact this area should be designated "Vacant / Other". As already mentioned, this error may have influenced the Area of Change designation for this area.

The revised CPU also incorporates changes in the types of Centers & Corridors, as well as the criteria for their designation. In my opinion, the new typology is an improvement. However, I'm concerned that the GIS Map error mentioned above, combined with a lack of awareness of the Academy Master Development Plan may be responsible for less than full consideration of the importance of Activity Center designation in the vicinity of Wyoming Blvd and Academy Blvd (see attached graphic exhibit).

From a more general perspective, while Centers & Corridors and Areas of Change/Consistency are valid and useful concepts as a framework for accommodating the City's growth, the application of these concepts as presented in the revised CPU appear in some cases to be problematic, especially in already developed areas. For example, in the portion of the City north of Montgomery Blvd. and east of I-25, the revised CPU Centers & Corridors Map shows eight (8) "Activity Centers", almost all of which are shown on the attached graphic exhibit as well. No Urban Centers or Employment Centers are shown in this area, which may or may not be appropriate. However, when the Centers Map and the Areas of Change/Consistency are compared, it appears that while the CPU intends to focus new growth to these Activity Centers, the Area of Change Map suggests that this may be difficult or impossible in this area as only a very few small areas of <u>already existing developed parcels</u> are associated with the Activity Centers. Understanding that accommodating new growth in existing developed areas is challenging, it would seem obvious that new growth should be encouraged for vacant parcels adjacent to Activity Centers, especially those appropriately zoned for development.

Thank you for your consideration of these matters. I welcome the opportunity to discuss them with you further.

Warm regards.

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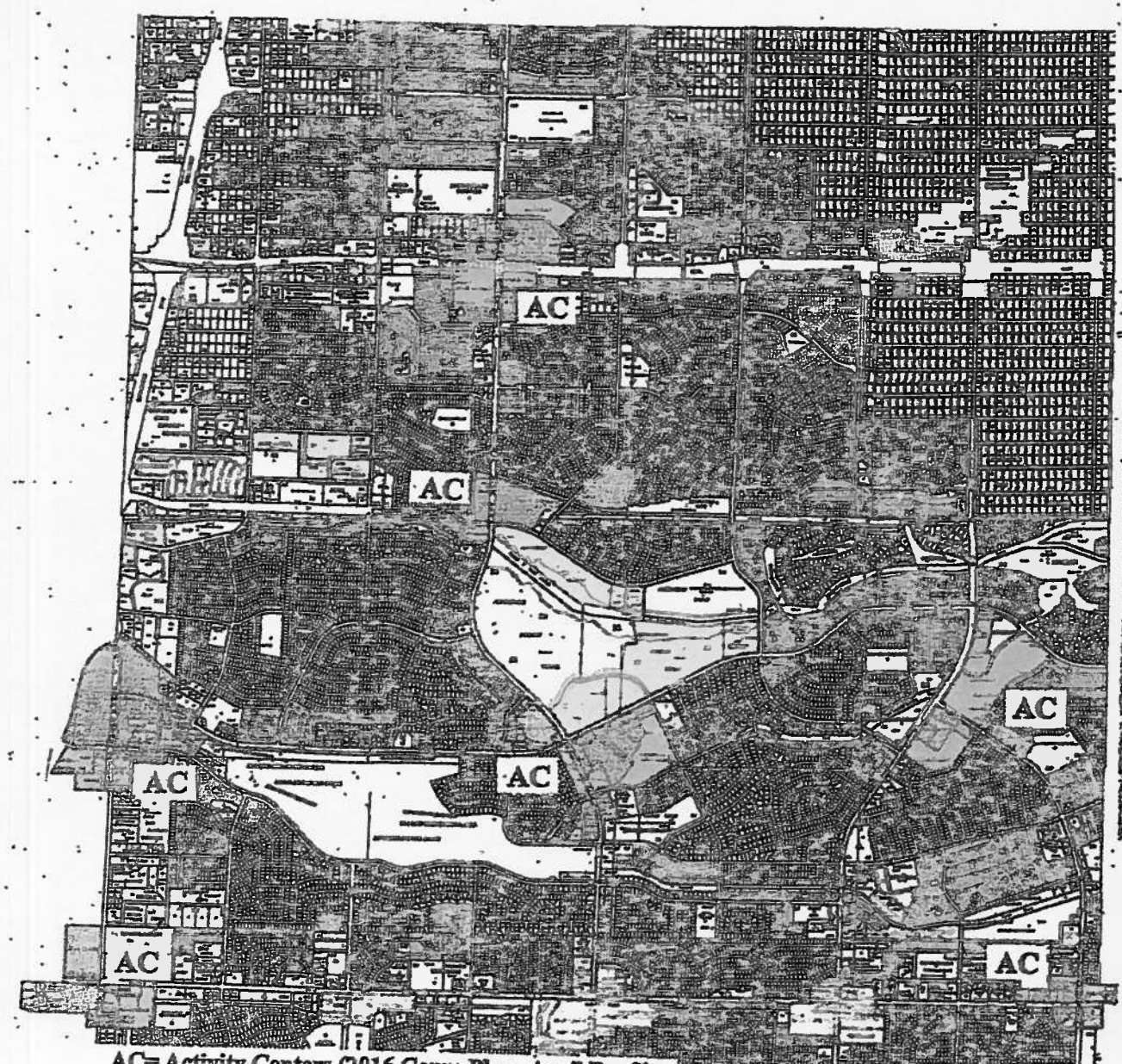

AC= Activity Centers (2016 Comp Plan- April Draft)

Yellow= Vacant Land (2012 City Map)

Current Zoning- SU-1 for PRD (Z-78-153)

Academy Campus	146 Ac	Townhome (8du/ac)	69 Ac
Mixed Office/ Residential (1.0 FAR)	25 Ac	Neighborhood Commercial	12 Ac
Multi-family (R-2)	15 Ac	Townhome/SF (RLT)	40 Ac
Park	5 Ac		

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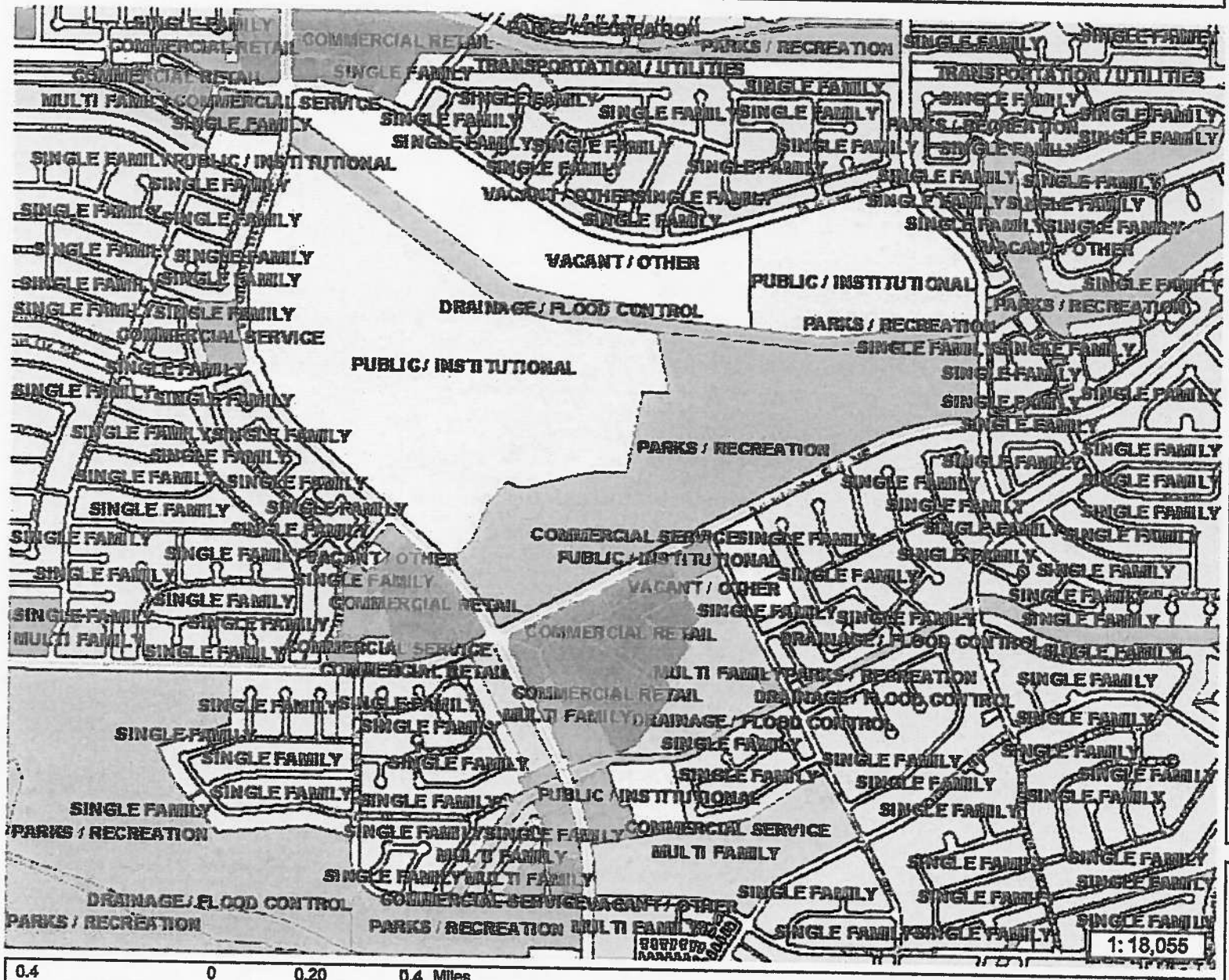

0.4 0 0.20 0.4 Miles

WGS_1984_Web_Mercator_Auxiliary_Sphere
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This map is a user generated static output from www.cabq.gov/gis and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.
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Legend

Land Use

- <all other values>
- SINGLE FAMILY
- MULTI FAMILY
- COMMERCIAL RETAIL
- COMMERCIAL SERVICE
- WHOLESALE / WAREHOUSING
- INDUSTRIAL / MANUFACTURING
- DRAINAGE / FLOOD CONTROL
- PARKS / RECREATION
- PUBLIC / INSTITUTIONAL
- TRANSPORTATION / UTILITIES
- PARKING LOTS / STRUCTURES
- AGRICULTURE
- VACANT / OTHER

Municipal Limits

- Corrales
- Edgewood
- Los Ranchos
- Rio Rancho
- Tijeras
- UNINCORPORATED

World Street Map

Notes

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Memo

Revised & Expanded (6/21/16)

To: ABC-Zone Team

From: Kim Murphy KDM

Date: June 20, 2016

RE: Land Use Section Comments: Revised Comprehensive Plan Update (May 2016)

As you know Chapters 4 thru 7, including Land Use, Transportation and Urban Design, of the Revised Comprehensive Plan Update (May 2016) were released for public comment on May 27th. With the latest release, all chapters are out for review except for Chapter 14: Implementation (referenced on the website), which is still pending.

While I have not had the opportunity to review all portions of the May Draft, I would like to commend the ABC-Zone Team, both staff and consultants, for a much more accessible and concise document.

As stated in the Introduction, the Comp Plan, while dealing with other related community planning matters, has "the power to shape land use and zoning decisions." And to that end: "The Comp Plan, along with zoning regulations, will be the primary implementation tool for the Centers and Corridors Vision" and the "Development Areas Map" for both the City and the County. Due to the short time frame to respond with comments, I am focusing only on the Land Use Section at this time, with comments on other Sections to follow.

First, the Land Use Section has been rather extensively edited and reorganized, which requires detailed review and close comparison to the January 2016 Draft to determine the extent and nature of the modifications. More time will be need to carefully review the May 2016 Draft in its entirety.

Second, it would appear that there may be a subtitle, recent shift in emphasis from accommodating new growth and development in Areas of Change, which includes Centers and Corridors, to solely Centers and Corridors. This impression may be misinformed, but seems indicated by careful comparison of the May 2016 Draft with the January 2016 Draft as follows:

> "Strategies" in Section 5.A of the earlier draft mentions: "Encouraging high-quality development and redevelopment in Areas of Change." While the recent draft, under the same section, states: "Encouraging high-quality development and re-

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development", with no mention of Areas of Change. What is the significance of this omission?
Section 5.6 "Context and Analysis" of the earlier draft, under subsection titled "How do Centers and Corridors related to Development Areas, states: "Centers and corridors are separate from Development Areas, and function as an overlay (emphasis added) of additional policies providing separate guidance about future development." The recent draft contains on mention of this relationship, leaving one with the impression that Centers and Corridors are the sole focus for new development.

Third, this concern about over-emphasis on Centers and Corridors is heightened even more after a review of the policies and actions at the end of the Land Use Section in the May 2016 Draft, when compared to the earlier draft, as follows:

Policy 5.6.8 "Areas of Change" of the earlier draft states: "Incentivize and encourage more intense growth in Centers, along Corridors, and where infill and redevelopment is well served by multi-modal transportation. Make Areas of Change the focus of new urban-scale development and redevelopment that benefit job creation and expanded housing options." Related Action 5.6.8.5 states: "Use the Change and Consistency Map as a guide to where future growth and development will occur." While the recent draft at Policy 5.6.2 "Areas of Change" simply states: "Direct growth and more intense development to Centers, Corridors, industrial and business parks, and Redevelopment Areas where change is encouraged." No mention of "Areas of Change" at all in the policy, only "Centers and Corridors". Further, the addition of "industrial and business parks and Redevelopment Areas does not comport with the criteria used to define Areas of Change, which also includes "large properties with approved Master Plans" (page 5-26).

Policy 5.2.1 "Land Uses" of the May 2016 Draft discourages zone changes to commercial, industrial or office uses outside of Centers and Corridors" (subsection d). This appears to be another example of over-emphasis, and would undermine goals related to jobs-housing balance and economic development. *Note: no comparison with earlier draft found.*

Its seems that having defined Areas of Change, which includes Centers & Corridors, it would be enough to simply state that new growth, development and redevelopment will be encouraged in the Areas of Change. Of course, with the understanding that the character of Center & Corridor development is further described by specific policies.

Fourth, Section 5.1.2.5 "City of Albuquerque Development Areas" mentions that 90 percent of new housing and 95 percent of new employment anticipated within the city between 2016 and 2040 can be accommodated in Areas of Change. Comparing the Centers and Corridors Map (page 5-15) with the Areas of Change & Areas of Consistency Map (page 5-

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25) offers an appreciation of non-Center & Corridor portions of Area of Change to that are necessary to accommodate new infill development and redevelopment. Land use policies should not minimize these opportunities outside of Centers & Corridors.

Fifth, the Centers and Corridors Map mentioned above (page 5-15) shows the current location of these important land planning elements, using 2013 boundaries; however, the May 2016 CP Draft does not indicate the process for expanding them or creating new Centers & Corridors. Based on the assumption that, much of the land within these areas has already been developed, procedures and policies for expanding Centers & Corridors and creating new ones are essential to accomplishing the overall goal of directing new growth to these planning elements.

Sixth, the following are additional specific comments on the "Goals, Policies & Actions" for the Land Use Section of the May 2016 Draft:

As stated above, Policy 5.1.2 "Development Areas" emphasizes Centers and Corridors, and while mentioning Development Areas, it's only in the context of Areas of Consistency. Areas of Change are not mentioned at all. Further, what is the purpose of this policy when Goal 5.5 and Goal 5.6 address Development Areas in greater detail?

Policy 5.1.5 "Employment Centers" emphasizes office, commercial and industrial development, while providing a threshold (80% build-out) for incorporating residential uses. This seems arbitrary and counter-productive. Perhaps some proportional measure could be substituted that would promote concurrent employment-based and appropriate residential development.

Policy 5.1.10 "Premium Transit Corridors" encourages higher-density residential near transit stations. This may conflict with Policy 5.1.5 mentioned above.

Action 5.2.3.3 under Policy 5.2.3 "Planned Communities" requires that Planned Communities "complement infill in urban areas." Planned Communities hopefully will complement urban infill by providing alternative lifestyles, housing and amenities. However, formalizing a nexus between the two as a policy mandate seems inappropriate.

Policy 5.4.1 "Housing Near Jobs" calls for prioritizing mixed-use development where employment exists in Employment Centers. While appropriate, this policy seems at odds with other Employment Center policies.

Policy 5.6.2 "Areas of Change" at subsection i) discourages zone changes from industrial uses to either mixed-use or residential uses in Areas of Change." Why are

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industrial uses "protected" in Areas of Change? Sees counter-productive to neighborhood protection and compatibility.

Action 5.7.2.2 under Policy 5.7.2 "Regulatory Alignment" promotes the creation mixed use zones to be developed by right in appropriate Centers & Corridors. This provision should be expanded to include the entire Areas of Change.

Thanks you for the opportunity to be involved in the ABC-Zone Project process. I appreciate the efforts of the staff and consultants and your willingness to consider these comments and questions.

Regards, Kim

Altura Real Estate, LLC

Kim D. Murphy, Principal
kim@altura-real-estate.com

Memo

To: ABC-Zone Team

From: Kim Murphy KDM

Date: June 24, 2016

RE: General Comments (Part 1of 2): Revised Comprehensive Plan Update (May 2016)

The purpose of this memo is to provide comments on the Revised Comprehensive Plan Update (May 2016 Draft), Chapters 1 through 8, exclusive of Chapter 5: Land Use which was the subject of a separate memo provided previously on Jun 21, 2016.

All chapters are much improved from the January 2016 Draft and are more readable and visually interesting. Congratulations!

Due to the shortness of time, general comments will be transmitted in two (2) parts. Comments on the remaining chapters (i.e. 9 through 13) will (hopefully!) be provided in a separate memo at a later time.

Chapter 1: Introduction
Chapter 2: Factors of Growth & Development
Chapter 3: The Vision

As mentioned previously, while the CP is for the City of Albuquerque and Bernalillo County, it should be mentioned that both are integral parts of an important mid-sized metropolitan area of nearly 1 million residents. Section 1.2 would be an excellent place to discuss this regional context. I'm told that reaching this threshold is significant for economic development efforts. If true, the statement on page 1-2 that the "Albuquerque area is the state's largest population center, accounting for over 675,000 people" may be misleading.

Section 1.7.4 refers to the implementation chapter, which is still pending. Of course, this is a very important element of the CP that will require careful review.

Related to the comment above regarding the importance of the greater Albuquerque Metropolitan Area, the MRCOG population forecast for the region resulting in a population of 1,3750,000 in 2040 should be added to the graph at the bottom of page 2-3.

Chart at bottom of page 2-4 (left side) should be modified by expanding the x-axis so that the point about the slow rate of growth in the City's median age is more obvious. Chart on right side of this page is puzzling.. it doesn't really show growth of millennials or seniors.

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Section 2.4.2 discusses the need for "policies that encourage infill development" and "sustainable growth patterns." These are desirable core values of the Plan. However, rather than denouncing "outward expansion", it should be acknowledged that today the City's boundaries are constrained and will likely be so in the future, as evidenced by the negligible amount of land annexed in the last 15 years, coupled by the filling-in of vacant land created by previous annexations since the 1980's. It is essential that the City provide incentives and encourage infill, including on-going development of approved Planned Communities, because further growth at the "urban fringe" through expansion is not just questionable public policy, it's virtually impossible in the current political environment. By 2040, during the timeframe of this Plan, I would predict that most of the readily-available undeveloped land and redevelopment opportunities will have been completed, and essentially the City will be "built-out" and land-locked. Therefore, it is vital that the 2016 Comp Plan and the IDO provide appropriate guidance for future growth and development, and not be an obstacle or hindrance, otherwise growth will shift to surrounding jurisdictions and the City will be burdened with the adverse regional consequences (traffic, air pollution, economic & tax base erosion, etc.) of development beyond its borders. If this comes to pass, we will have failed to realize many desirable objectives of the Plan, such as improved mobility, expanded & affordable housing options, jobs-housing balance, economic development and diverse, vibrant & compact communities.

Section 2.4.5 states that "existing and designated" Centers and Corridors will capture much of the future growth in the City and County. If this is the desired outcome, procedures and policies need to be implemented for the expansion or creation of Centers & Corridors over time. This comment is also relevant to the Vision Chapter (page 3.6) and the Land Use Chapter (various pages).

Chapter 4: Community Identity

See comment below regarding policy integration of Chapters 4. 5, 6 & 7.

Goal numbering is not sequential.

No other comments at this time.

Chapter 5: Land Use

Comments on this portion of the May 2016 Draft were made previously in a separate memo dated June 20, 2016 (Revised & Expanded on June 21, 2016).

Chapter 6: Transportation

Statement is Section 6.1.1 that "proportion" of seniors will "more than double" in 20 years should be checked. Should this be the number of seniors rather than proportion?

The issue of demand for public transportation by seniors is complex and should not be overstated (see Section 6.1.1), especially when compared to demand for paratransit (page 6-13). Also, note

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the importance of the pedestrian system as the "primary transportation element that connects all travel modes" (page 6-15).

See comment below regarding policy integration of Chapters 4, 5, 6 & 7.

Chapter 7: Urban Design

In the table at the bottom of page 7-6 (left side), Activities Centers should be represented in the "Suburban" column as well.

See comment below regarding policy integration of Chapters 4, 5, 6 & 7.

Chapter 8: Economic Development

The discussion in Section 8.1.2.6 regarding barriers to infill development which "draw" employment opportunities to "greenfield development" at the edges of the City (page 8-15) is a generalization which is not reality here in ABQ. A vast majority of the regions employment is centrally located in a triangle marked by Downtown, KAFB/Sandia and Uptown, not at the "urban fringe". However, removing the barriers to infill development which promotes employment growth are important areas for policy guidance.

Policy Integration: Community Identity, Land Use, Transportation & Urban Design

The level of detail and multitude of factors involved in the policies related to Community Identity (Ch. 4), Land Use (Ch. 5), Transportation (Ch. 6) and Urban Design (Ch.7) are overwhelming in terms of presenting a clear, concise, consistent models of development, particularly given the differences in character between the City and the County. The consolidation of individual policies from these chapters into a consistent whole which might offer an integrated model of desirable development is beyond challenging, and include City Development Areas (Goal 5.6), Land Use-Transportation Integration (Goal 6.1, especially Street Design in Policy 6.1.3 thru 6.1.8), Community Planning Areas (Policy 4.3.1 thru 4.3.12, re-numbered), Development Form (Policy 7.1.2) and Priority Street Elements (Policy 7.1.3).

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Reed, Terra L.

From: rrnabq <robert.nelson.abq@gmail.com>
Sent: Friday, July 22, 2016 3:07 PM
To: Planning Comp Plan-UDO
Subject: Official EPC Comments on the ABC Comp Plan
Attachments: EPC Letter Final.pdf

Good afternoon Chair Karen Hudson,

Please see the attached letter from the Historic Neighborhoods Alliance (HNA) for comments for the upcoming EPC hearing on the ABC Comp Plan. Thank you for your time and consideration.

Sincerely,

Robert Nelson
Wells Park Resident, Wells Park Neighborhood Association Board
Member of Historic Neighborhoods Alliance (HNA)

Robert Nelson | robert.nelson.abq@gmail.com

Letter to Environmental Planning Commission
RE: Comments in Regards to ABC-Z Comprehensive Plan

July 22, 2016

To Whom It May Concern,

The Historic Neighborhoods Alliance (HNA) is writing to express our concerns about the upcoming vote for ABC-Z Comprehensive Plan. While many of our members have attended the various public meetings hosted by the Planning Department in regards to the Comprehensive Plan, we have not been able to attend all of them due to our obligations to our jobs and dedication to community activities and our families.

We are concerned that the proceedings for the Comprehensive Plan have been inequitable to populations directly impacted by the plan, specifically people of color and people who experience poverty. We are also familiar with the Charter of the New Urbanism, which hosts a growing number of developers who see New Urbanism as a way to right some of the wrongs in their profession without neglecting their profits. One major tenet of New Urbanism is that in building and rebuilding towns and cities, we should respect the historical patterns, precedents and boundaries that made earlier settlements flourish.

The HNA agrees with these values. While the Comp Plan does express this respect rhetorically, we have reason to be concerned, as evidenced by recent actions (the attempt to usurp funds from Housing & Neighborhood Economic Development Fund, Santolina development, Albuquerque Rapid Transit project), as well as some troubling language within the current draft of the Comp Plan, that the city will not practice what it preaches.

We understand the plan is in draft form. However, the continued updating has created difficulties for the community to provide meaningful, complete feedback. The individual sector development plans have been discarded without any public notification process to inform neighborhoods and gain their input on these changes. In light of this, we question why Bernalillo County is keeping their sector development plans, while the city is not.

We have larger concerns over the implications of what we've cited above. This includes the elimination of individual neighborhood identities, which has raised human and civil rights concerns amongst our neighbors, as we are directly impacted by the changes of the plan, and subsequently, the proposed Integrated Development Ordinance (IDO), which is also in a draft phase.

We appreciate that you have received our input and would like to see this input reflected at the hearing dated for August 4th, 2016. If you have questions, we can be contacted via email at robert.nelson.abq@gmail.com.

Sincerely,

The Historic Neighborhoods Alliance:

Diana Dorn Jones, South Broadway Resident; Director, United South Broadway Corp
Bianca Encinias, Wells Park Resident, Wells Park Neighborhood Association
Angela Vigil, Martineztown Workgroup
Loretta Naranjo Lopez, President, Martineztown Workgroup
Esther Abeyta, San Jose Resident
Catherine Mexal, Wells Park Resident
Chad Gruber, Board Member, Barelas Community Coalition
Ian Mentken
Robert Nelson, Wells Park Resident, Wells Park Neighborhood Association

Comment from Susan Deichsel and David Rusk

In reviewing quickly the Planning Department's latest ABC-Z PowerPoint, I see on an early slide that "No more City annexation expected." THAT WOULD BE A HUGE, HUGE MISTAKE THAT WOULD DWARF ANY OTHER POLICIES IN THE REVISED PLAN. In fact, the fact that New Mexico state law allows annexation (albeit, with special restrictions in Albuquerque's case) has been more important for shaping Albuquerque's socioeconomic and fiscal health than anything that any city planning department/EPC/City Council has ever done. Believe me, I have studied this for all central cities in the USA's 380 metro areas probably more than anyone else. I recognize that, compared with my time, the City has a) lost effective control over the regional water-sewer agency which now operates without regard for the city's annexation policies, b) probably faces a more "independent," politically connected Bernalillo County Commission, and c) may well have seen other pro-City powers limited by the NM legislature (e.g. the 5-mile zone re: extraterritorial planning and zoning powers??). However, it is essential that Albuquerque's boundaries not be cut off from significant future growth.

This is true even for giant cities like Dallas and San Antonio. Dallas grew through annexation from 112.0 sq. mi. in 1950 to 342.4 sq. mi. by 1990 (about twice Albuquerque's area) but since then has been completely hemmed in by incorporated suburban municipalities and has not expanded one sq. ft. (in fact, it's lost 1.9 sq. mi/); since 2002, its bond rating had dropped from a blue-chip Aaa to a still excellent but declining Aa1 (IV 2010) and probably had declined further in the five years since. By contrast, San Antonio grew from 69.5 sq. mi. in 1950 to 333 sq. mi. by 1990, but has continued annexing, reaching 460.9 sq. mi. by 2010. Its bond rating has improved from Aa2 (2002) to Aaa (III 2011) even though, overall, the San Antonio area is a poorer region.

You might alert Mikaela to my comment on this right away (feel free to share this email with her). I will scan the ABC-Z revisions to see if there is more on this proposed policy/expectation, but will write up this issue for you tomorrow before I address other points in the plan.

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davidrusk@verizon.net

July 5, 2016

MEMORANDUM

TO Susan Deichsel

SUBJECT: My comments on draft ABC-Z Plan: Introduction

You have asked me to review and comment on the draft ABC-Z Comp Plan. You also provided me with the links to documents on the Santolina developments and "Taking the Wheel," the recent publication of MRCOG and the Urban Land Institute, for context.

I have finished reading through the draft Comp Plan's 451 pages. It is an impressive undertaking and I learned a good deal from it. You mentioned that the planning staff hopes to cut its length down by 10% (perhaps even 25%). I wouldn't bother. In its standardized format the 13 "Background & Analysis" sections are very informative and often lively reading. By contrast, the 13 "Goals, Policies & Actions" sections are tedious to read through, but they are, after all, the plan's to-do checklist.

However, the planning process might take to heart some advice from the Portland area. About 15 years ago Mike Burton, the elected chief executive of Portland Metro, the USA's only directly-elected regional government, and I gave a joint presentation to an Albuquerque audience. The Albuquerque community had just completed an extensive community visioning process and one of the civic leaders present was lamenting that nobody seemed to be paying any attention to it.

Mike asked him "How long is your Vision Statement?"

"About 100 pages."

"That's about 99 pages too long. The metro Portland vision statement is two sentences:

- "Everyone can always see Mount Hood."
- "Every child can walk to a library."

The Albuquerque audience laughed but when you think about these two statements, they convey quite profound planning implications.

- "Everyone can always see Mount Hood" doesn't mean that every home should have a big picture window facing east towards Mount Hood but that from anywhere in a 2+-million person metropolitan area, you can look through up to 25 miles of urban air and it will be clear enough to see Mount Hood. That has profound implications for growth policy (e.g. Portland's famed Urban Growth Boundary), housing policy (new development in all 22 municipalities is required to be at least 50% multi-family and townhouse units), transportation policy (the region has shifted most federal transportation funds from highways to its light rail and bus services), and retail development (Big Box stores are banned on industrially-zoned land).
- "Every child can always walk to a library" does not define the American Library Association's nirvana. It means that every child can also walk to school, a playground, or play on the sidewalk along safe streets and that adults can walk to stores, church, or nearby bus stops or transit stations.

I think that the planning staff, EPC, civic leaders, etc. need to give a lot of thought to what two or three phrases or sentences would capture the vision of the ABC-Z Comp Plan.

My comments will be organized in four parts. The first three deal with major issues that are not addressed or only mentioned in passing in the Comp Plan. In other words, what's *not* there but really should be. These topics are annexation, Albuquerque Public Schools, and mixed-*income* housing. The fourth part will provide my comments on about eleven pages of short passages I copied down from the draft text. Some of my comments will just provide further history and background to various issues and initiatives in the plan.

You and the planning staff need to bear in mind that it has now been 25 years since Delcia and I lived in Albuquerque ... and almost 35 years since I was mayor. I have only been back to Albuquerque less than a half dozen times in a professional capacity. The last was for "Governing Greater Albuquerque," the study on city-county consolidation that I did for the Albuquerque-Bernalillo County Unification Exploration Group in 2002 (which was widely ignored). There will have been many changes, particularly changes in state laws, local ordinances, etc. that I will not be familiar with. Both the Water Authority and the Surface Drinking Water program, for example, are significant developments since my time as a local resident.

On the other hand, I've spent the past 25 years as a consultant, writer and speaker on urban policy. In that capacity I've worked in over 130 metro areas in 35 states plus in Canada, England, Germany, South Africa, and The Netherlands

(where I was a visiting professor of urban planning at the University of Amsterdam in 1999-2001 and did a major study for the Dutch government). Except for some speeches at major national conferences I never trot out a canned presentation. I've always analyzed my host community extensively through multi-decade census reports, assessed valuation records, school report cards, and other sources.

Many would consider me one of the nation's leading experts on issues of annexation/city-county consolidation, the housing-school nexus, and mixed-income housing (particularly, inclusionary zoning) – the three "missing" issues I highlight for the ABC-Z Comp Plan. In the three following essays I won't ask you just to take my word for it. I'll provide enough documentation to illustrate my points. But I could write an extensive report (or even a book) on each issue – as indeed I already have.

I hope that these comments will be helpful to you and the planning staff while you both think about how to mold an even better future for Albuquerque.

All the best.

David Rusk

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July 5, 2016

MEMORANDUM

TO Susan Deichsel

SUBJECT: My comments on draft ABC-Z Plan: Part I: Annexation

This memo will address annexation, the first of the major "missing" topics in the draft ABC-Z Comp Plan. Before starting to read the ABC-Z draft plan, in reviewing quickly the Planning Department's latest ABC-Z PowerPoint, I saw on an early slide that "No more City annexation expected." I practically went ballistic in an immediate email to you, saying "THAT WOULD BE A HUGE, HUGE MISTAKE THAT WOULD DWARF ANY OTHER POLICIES IN THE REVISED PLAN. In fact, the fact that New Mexico state law allows annexation (albeit, with special restrictions in Albuquerque's case) has been more important for shaping Albuquerque's socioeconomic and fiscal health than anything that any city planning department/EPC/City Council has ever done."

Having now read through the 451-page draft Comp Plan, I found only one reference to annexation in the following historical restrospective:

> *11-9 "Through an aggressive policy of **annexation** beginning in the mid-1920s, City leaders began to shape a pattern of growth, largely influenced by the AT&SF Railroad, that continued through the 20th century. As the city grew, its boundaries expanded. The City **annexed** newly formed subdivisions and three previously unincorporated communities into its boundaries: the original Villa de Alburquerque (located two miles west of the railroad town); the seventeenth century Hispanic village of Barelas (situated immediately south of the original townsite); and the once semi-autonomous communities of Martineztown and Santa Barbara (located to the northeast of the historic downtown's commercial center)."*

The fact that is the sole reference to annexation in the Comp Plan gives me even greater concern. It suggests that the no further annexation is now settled policy.

Though the city did not undertake major annexations during my term as mayor (1977-81), I well understood its importance to the city's overall economic, social and fiscal health. In fact, sometime during those years I was invited to testify on urban policy before the Joint Economic Committee of the US Congress.

I invited the US Senators and Representatives present to consider a "tale of two cities," presenting a few census statistics to support the comparison. City A's population, job market, and tax base were steadily growing with an above average medium family income and modest poverty rate. City B's population was shrinking and aging, its job supply stagnant, a declining tax base with below average family income (and constantly falling) and high poverty levels. One of these cities was Albuquerque (seen as a Sunbelt star), the other was Cleveland (seen as one of the USA's most depressed Rust Belt cities). Which is which? I asked them.

To their surprise I said that Cleveland was City A, the expanding, healthy city and Albuquerque was City B, the declining, poverty-impacted city. However, I explained the "Cleveland" that I described was the entire, four-county Cleveland metro area whereas the "Albuquerque" I described was an Albuquerque trapped within its 1940 city limits (about 11 sq. mi.).

The basic difference was annexation. Under Ohio state law, the 79-sq. mi. city of Cleveland had become completely surrounded by incorporated suburbs and had annexed nothing since before mid-century. All the net growth (population, jobs, and tax base) in the Cleveland metro area had occurred outside its boundaries. By contrast, under New Mexico law, the city of Albuquerque had annexed most of the region's new growth; between 1940 and 1980 it expanded its boundaries from 11 sq. mi. to 95 sq. mi., thereby capturing 85% of Bernalillo County's net population growth and probably 90% of its property tax base growth. (Since my testimony Albuquerque has almost doubled again in area to 187.7 sq. mi. by 2010.)

More than a decade later, I analyzed the dynamics of all the nation's central cities and documented the distinction between "elastic" cities and "inelastic" cities Several years later I added to that terminology the notion of "Big Box" regions (with "elastic" cities at their core) and "little boxes" regions (with "inelastic" central cities).

Cities without Suburbs (now in its 4th edition) documents the advantages to both the central city and its entire region of having elastic central cities. Along with seven other paired communities, Chapter 1 compares Albuquerque and Syracuse (city and region) across a wide range of socioeconomic and fiscal measures. Chapter 2 generalizes those comparisons for all 117 metro areas above 350,000 population, categorizing Albuquerque as a "hyper-elastic" city/region and Syracuse as a "zero-elastic" city/region.

Drawing upon both the research of academic experts more skilled than I and upon my own research and hands-on, on-the-ground experiences in so many

communities, I can show that, as contrasted with "inelastic" cities/"little boxes" regions, "elastic cities/"Big Box" regions are

- Less racially and economically segregated residentially;
- Have somewhat higher median family incomes and lower family poverty rates (when adjusted for regional costs-of-living);
- Have stronger rates of economic growth; and
- Their central cities have much better credit ratings.

On this last point, look at the study that I did for The Brookings Institution (http://www.brookings.edu/research/reports/2006/08/metropolitanpolicy-rusk). It demonstrates that a central city's bond rating is directly related to its ability to capture the population growth of its central county (or counties). Indeed, if all the Aaa-rated cities are grouped together, all the Aa1s, etc. (thus, averaging out individual city variability), over five decades there was a 0.90 correlation between a city's record in capturing its central county (or central counties') population growth and its Moody's bond rating.

A city's ability to be "elastic" in the future is one of the factors that the bond rating agencies consider. In effect, annexation is the most effective method to maintain (or expand) a city's market share of higher end regional growth (whether residential or commercial). Back in the fall of 1993 I saw a brief article in the Washington Post's business section where a senior vice president of Standard & Poor's had announced that S & P was actively going to take a city's annexation prospects into account as one of the factors in determining bond ratings. I called that VP in New York, briefly introduced myself (maybe just as a former mayor) and expressed my appreciation of S & P's new policy. "Well, we've been reading your book," he explained.

And though it's been a decade since I looked up Moody's Investors Service research reports for a number of cities, a city's prospects for future annexations or city-county consolidation was the second topic addressed in their standard format.

If a region is going to continue to grow outward, a formerly "elastic" city's becoming inelastic either through being surrounded by incorporated suburbs, through adverse changes in state laws, or just as a matter of voluntary choice can have pretty immediate adverse effects. As I wrote in my instant email to you,

> This is true even for giant cities like Dallas and San Antonio. Dallas grew through annexation from 112.0 sq. mi. in 1950 to 342.4 sq. mi. by 1990 (about twice Albuquerque's area) but since then has been completely hemmed in by incorporated suburban municipalities and has not expanded one sq. ft. (in fact, it's lost 1.9 sq. mi/); since 2002, its bond rating had dropped from a blue-chip Aaa to a still excellent but declining Aa1 (IV

2010) and probably had declined further in the five years since. [Indeed, I just (i.e. July 5) looked up Dallas's latest rating by Moody's; *in October 2015 the city's General Obligation bonds were further downgraded from Aa1 to Aa2.*] By contrast, San Antonio grew from 69.5 sq. mi. in 1950 to 333 sq. mi. by 1990, but has continued annexing, reaching 460.9 sq. mi. by 2010. Its bond rating has improved from Aa2 (2002) to Aaa (III 2011) even though, overall, the San Antonio area is a much poorer region than the Dallas region.

In one of your emails to me you raise the question of "how the development of a huge, non-centralized community such as Santolina could likely derail the present focus of the City on revitalizing the central core neighborhoods that already have municipal infrastructure (as outdated as much of it is) to refocus attention on a community the size of a small town (i.e. Santolina)."

In theory, it is better for a city to control sprawl (viz. Metro Portland's Urban Growth Boundary) than for a city to simply capture its market share of sprawl through annexation. But if a region's not going to function like Metro Portland under Oregon's rigorous growth management laws and will continue to have peripheral growth, it is much, much better for that growth to be within a city's expanding boundaries than not.

The "let's just focus on the needs of existing neighborhoods" argument could have been raised in every decade over the past half century. From the vantage point the city's central core neighborhood residents of 2016, should the municipality's expansion have been capped at

- 3.1 sq. mi. In 1930?
- 11.1 sq. mi. in 1940?
- 48.3 sq, mi. in 1950?
- 61.0 sq. mi. in 1960?
- 80.6 sq. mi. in 1970?
- 97.6 sq. mi. in 1980?
- 132.9 sq. mi. in 1990?
- 186.9 sq. mi. in 2000?
- Or 187.7 sq. mi. in 2010 (the worst decade since the 1920's)

It's the very existence of that 187.7 sq. mi. tax base ($44 billion market value property tax base in 2011; gross receipts tax collections of $298 million for FY 2014, etc.) that gives the City of Albuquerque the capacity to even allocate funds to upgrade services and facilities for core neighborhoods.

You doubt? Let me give you the (admittedly extreme) example of Camden, New Jersey. In 1950 the City of Camden's municipal area was 8.6 sq. mi. (not so different from Albuquerque's 11.1 sq. mi. area in 1940) and its area would be unchanged in the decades to come. Over the next 60 years Camden County's population grew from 300,743 to 513,657 (not Bernalillo County's explosive growth, but still a substantial 70% increase). However, boundary-constrained Camden's population dropped from 124.743 to 77,344; Camden not only did not capture any of the county's growth but actually contributed 22% of the population growth of its 33 suburban boroughs and townships.

And what it contributed was its middle class. By 2014, Camden's poverty rate was 39.3% – the country's fourth poorest central city behind Benton Harbor MI (47.4%), East St. Louis IL (45.4%), and Detroit MI (39.8%) – all of which are zero-elastic cities.[1] Both Camden's city government and Camden City Public Schools are bankrupt and have been taken over by state authorities. Its property tax base has become so depleted that if the city schools were dependent solely on local property tax revenues, the schools for 18,000 poor children would be open only four *days* a year! However much Camden's residents might want to concentrate city resources on core neighborhoods, there is nothing left to work with.

Albuquerque as we know it today will never be Camden. But an Albuquerque trapped forever within its 11.1 sq. mi. city limits of 1940 (i.e. "Old Albuquerque") would be much closer to Camden than anything approximating today's 187.7 sq. mi. city. And those 1940-era city neighborhoods would be more depressed than they actually are today because over the decades, as the quality of city services fell and facilities crumbled, most middle class residents and the retail businesses that served them would have moved out.

Contrast Old Albuquerque's hypothetical plight with Charlotte's "City within a City." Through annexation Charlotte grew from 30.0 sq. mi. in 297.7 sq. mi. in 2010 and has a property tax base of over $74 billion (market value). The Charlotte City Council has officially targeted older core neighborhoods covering 60 sq. mi. (roughly the city's boundaries in 1960) to receive enhanced services and major facility upgrades as its "City within a City." The result is that Charlotte's core neighborhoods are making a strong comeback.

So I repeat my earlier question: just when would you have cut off Albuquerque's past expansion through annexation? And why would ending the annexation policy at the very heart of Albuquerque's current municipal prosperity make any sense today?

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[1] By comparison, the city of Albuquerque's poverty rate was 18.5% in 2014 – in a lower cost-of-living region than the Philadelphia-Camden PA-NJ region.

Absent Metro Portland's policies, the let's-stop-annexing-peripheral-growth-and-concentrate-existing-resources-on-core-neighborhoods is the Sirens' Song. If the city planning director must listen to it, tie her to the mast but stuff everyone else's ears with wax.

Of course, in recent years, Albuquerque's annexation desires are caught between Scylla and Charybdis in the form of Bernalillo County Government and the Albuquerque-Bernalillo County Water Utility Authority. In my time the equivalent of the Water Authority was simply an operating department of city government subject to the policy direction of the City Council and executive direction of the Mayor and Chief Administrative Officer. When a new peripheral development sought utility services from the city, we could require that it agree to annexation. Now the city doesn't have that power. Policy direction is shared with the county and it has no executive power.[2] I'm confident that the Water Authority could care less whether a prospective new customer is annexed by the city or not. ("Just hook onto our system.") So much for Charybdis.

Moreover, my impression is that, Scylla-like, county government seems to want to gorge itself more and more on picking off municipal services for unincorporated communities. During my two decades as an area resident county government was a very junior partner with the city. By the early 2000s, however, county government had a very effective county administrator (who became head of the born-again Water Authority) and a very politically-savvy county commission composed of veterans of legislative and city council experience. The county thoroughly outmaneuvered the city at the state legislature on various issues.

It's ironic that whereas county commissioners are elected by constituents who are over 80% also city residents, it spends so much time and energy devoted to the 20% of Bernalillo County that lies outside the city limits – sometimes championing policies that are contrary to city residents' (i.e. most of their constituents') interests. Indeed, I recall that, during the city-county consolidation exploration process, the Unification Exploration Committee commissioned a study that showed that through taxes they paid to the county, city residents were heavily subsidizing municipal-type services to county residents.

It's time that city residents elected county commissioners that won't work against their interests. But that will take helping educate city residents to what their true interests are.

David Rusk

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[2] See 12-6 [Re: Water Authority] "The City and County therefore have a role in policy-making but no executive function."

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July 13, 2016

MEMORANDUM

TO: Susan Deichsel

SUBJECT: My comments on draft ABC-Z Plan: Part II: Albuquerque Public Schools

In FY 2015-16 Albuquerque Public Schools (APS) has a larger budget[1] and more employees than city and county government combined.[2] APS operates a bigger transit system than ABQ Ride.[3] APS probably owns more land than the city Parks & Recreation Department.[4] APS has more impact (by far) on the quality of our community's labor force and economic competitiveness than any workforce training and economic development programs undertaken by city and county government.

Most crucially, the two most important "inputs" into its educational mission are how many students there are and what is their socioeconomic mix (or lack of mix) in its 90 elementary, 26 middle, and 13 high schools. But APS has very limited influence over the "how many" and "who" of its 87,000 students. Those issues are substantially shaped by the planning and zoning decisions of city and county government.

So why is APS almost totally absent from the ABC-Z Comp Plan?

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[1] APS's budget exceeds $1.3 billion, including $688 million in operating funds, a $342 million annual capital budget, $134 million in annual debt service, and $142 million in special revenues funds (federal grants, food services, athletics, etc.). The City's total budget is $915 million ($504 million general fund) and the County's general fund budget is $258 million.

[2] APS has 15,261 employees (12,314 Full-Time Equivalent) while the City has 5,788 employees and the County has 2,490.

[3] APS's 389 school buses provide transportation for 41,627 students twice a day for 180 school days. That's 15 million passenger rides annually compared with ABQ Ride's 12.4 million in FY 2015.

[4] I've been unable to find printed statements from each regarding acreage of land owned, and have been unwilling to sort through the city's GIS system to find out.

APS is the subject of only one substantive recommendation in the draft Comp Plan, as follows: 6-53 "Policy 6.7.3 Schools: Collaborate with Albuquerque Public Schools and State School Districts to provide safe access to school sites for all transportation modes [ABC]." (And that is on a fairly minor issue and is stated without any further elaboration.)

Moreover, in the 451-page draft Comp Plan APS or, more generically, schools are mentioned only eight times, usually as part of a list of interested parties or factors to be considered without any subsequent discussion.[5]

Notably, APS isn't even considered a player, as in 3-20. "Action 1.1: Foster cross-department and cross-agency coordination between the City, County, MRCOG and ABCWUA" or "Action 1.2: Link the Comp Plan with the City's and County's capital planning programs." or in 6-29/30 where there's no mention of APS as key agency re transportation. Such omissions are only partially offset by 10-23 "Coordinate siting of new public, joint-use facilities with other agencies, such as AMAFCA and Albuquerque Public Schools."

The Comp Plan devotes an entire chapter to the City's and County's economic development activities while belatedly acknowledging that on 8-13 "City and County governments are largely dependent on the efforts of local education institutions and nonprofit organizations to coordinate and provide training."

Similarly, chapter 9 acknowledges that in 10-5 "City parks are also located on land owned by the Board of Education and managed to serve the adjacent school as well as the public" but doesn't develop that point.

The Albuquerque Planning Department is hardly unique in overlooking the area's largest and, in the eyes of many parents, most important local government in framing its Comp Plan. That's a common trait of many "comprehensive plans" as framed by professional planners trained in architectural and urban planning schools.

As is stated in the draft [1-6], the Comp Plan is "primarily a land use document.... At the same time, the distinctive benefit of comp plans is how they identify and confront significant issues *in a holistic way*.... Only a comprehensive plan fully considers *how the whole community's values, needs, people, and places are interrelated and interdependent* [emphasis added]."

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[5]See 4-28 [re Uptown CPA) – "Schools and parks as focal points for community events and social activities"; 5-26 [re criteria for Areas of Consistency] ... "Schools (APS)"; 6-16 "Trails provide off-street connectivity to community resources such as parks, open spaces, schools ..."; and 9-30 "Partner with public and private institutions, schools, human service providers, and other stakeholders to address the needs of children and families. [ABC]

Albuquerque Public Schools must be a central player in and focus of the ABC Comp Plan. The overriding reason is not that, discounting city ownership of the public right-of-way, APS is probably the city's largest land owner, but that "housing policy *IS* school policy" and, conversely, that "school policy *IS* housing policy." I will explain both of these observations in detail.

Housing Policy *Is* School Policy: National Studies

In 1966, sociologist James Coleman released his path-breaking study, *Equality of Educational Opportunity*. Sponsored by the then-US Office of Education, Coleman and his research team examined pupil, family, and school characteristics for over 600,000 public school children in 4,000 schools nationwide in search of factors that were associated with academic success.

The Coleman Report concluded that the socioeconomic characteristics of a child and of the child's classmates (measured principally by family income and parental education) were the overwhelming factors that accounted for academic success. Nothing else – expenditures per pupil, pupil-teacher ratios, teacher experience, instructional materials, age of school buildings, etc. – came close. *"The educational resources provided by a child's fellow students,"* Coleman summarized, *"are more important for his achievement than are the resources provided by the school board."* So important are fellow students, the report found, that *"the social composition of the student body is more highly related to achievement, independent of the student's own social background, than is any school factor."*[6]

For five decades, educational researchers, including Coleman, have revisited, refined, and debated Coleman's original findings. There has been no more consistent finding of educational research that the paramount importance of a school's socioeconomic makeup on academic achievement.

In 2010, two educational researchers reanalyzed Coleman's data, utilizing his original statistical model while also applying a "two level hierarchical linear model" that would more effectively isolate the effect of classmates' socioeconomic composition and the student's own family socioeconomic status on that student's

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[6] Quoted in Richard D. Kahlenberg. *All Together Now: Creating Middle-Class Schools through Public School Choice.* Brookings Institution Press: Washington, DC. (2001), page 28. Kahlenberg's 33 pages of footnotes to chapters 3 and 4 catalogue most major studies on the effects of racial and economic school integration.

achievement. Unequivocally, they found that *"both the racial/ethnic and social class composition of a student's school [were] more than 1 3/4 times more important than a student's individual race/ethnicity or social class for understanding educational outcomes. In dramatic contrast to previous analyses of the Coleman data, these findings reveal that school context effects dwarf the effects of family background"* (p. 1239).[7]

Also in 2010, Dr. Heather Schwartz published what is, to date, the definitive study of the impact of economic integration on the education of low-income students. Based on her doctoral dissertation for Columbia University, Dr. Schwartz's report for The Century Foundation summarized her detailed research into the academic performance of public housing children in the Montgomery County (Maryland) Public Schools.[8]

Dr. Schwartz summarized her findings thus:

> Although most education research attempts to quantify the effects of various promising school-based reforms for low-income children, many of which Montgomery County has embraced—for example, full-day kindergarten, smaller class sizes in early grades, a balanced literacy curriculum, increased professional development—the results from this study suggest that the efforts to enroll low-income children in low-poverty schools has proven even more powerful. Although the county's inclusionary zoning policy occurs outside the school walls, it has had a powerful educational impact, even as measured by the most demanding but perhaps most meaningful test. Namely, that over the course of elementary school, ***highly disadvantaged children with access to the district's lowest-poverty neighborhoods and schools began to catch up to their non-poor, high-performing peers, while similar disadvantaged children without such access did not*** [emphasis added].

Housing Policy *Is* School Policy: Albuquerque Studies

Over the past quarter century I myself have done at least two dozen metro-wide or statewide studies of the factors affecting academic outcomes. My first

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[7] Borman, G. D., & Dowling, M. (2010). Schools and Inequality: A Multilevel Analysis of Coleman's Equality of Educational Opportunity Data. *Teachers College Record* , *112* (5), 12011246.

[8] The report, "Housing Policy Is School Policy," can be accessed at http://tcf.org/publications/pdfs/housing-policy-is-school-policy-pdf/Schwartz.pdf .

study was an analysis of pupils from public housing families in the Albuquerque Public Schools[9] in collaboration with The Urban Institute and with the support of the Carnegie Corporation. With detailed data provide by both APS and Albuquerque Housing Services, we were ultimately able to match records for 1,108 public housing children attending APS elementary schools between 1981 and 1991. The findings:

- At the school level there was a very high correlation of 0.75 and 0.78 between the percentage of children receiving **F**ree **A**nd **R**educed-price **M**eals (FARM) and standardized math and reading scores for third and fifth grade pupils, respectively.
- At the level of the individual public housing pupil, controlling for individual and family characteristics, the socioeconomic status of the school that child attends has a statistically significant impact on academic performance. The higher the proportion of schoolmates from other low-income families [i.e. FARM pupils], the more negatively impacted that child's academic performance. Each percentage increase in the proportion of classmates receiving free lunches is associated with a 0.22 percentile decrease in the public housing pupil's test ranking. *In other words, on average, the effect of a public housing child's attending a school with 80 percent low-income classmates rather than that same child's attending a school with 20 percent low-income classmates would likely be a 13 percentile decline in the child's test performance.*
- Controlling again for the same individual and family-based variables, the average academic level of the school the public housing child attends also has a statistically significant impact on the child's academic performance. The higher the school's average academic achievement level, the higher the public housing child's academic performance. Each percentile increase in the school's academic level is associated with a 0.53 percentile increase in the public housing student's percentile ranking. *On average, the effect of a public housing child's attending a school ranked in the 80th percentile academically rather than attending a school ranked in the 20th percentile academically would likely be a 32 percentile improvement in the child's test performance.*

But, of course, almost invariably, high-performance schools are also low-FARM schools.

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[9] David Rusk and Jeff Mosely, "The Academic Performance of Public Housing Children – Does Living in Middle Class Neighborhoods and Attending Middle-Class Schools Make a Difference?" Washington, DC (May, 1994).

Summary Overview of Research

Since that initial study in 1994, in my two dozen other studies the typical correlation between percentage FARMS and standardized test scores has ranged from 0.65 to 0.88. Where data have been available, "school inputs" (e.g. expenditures per student, class size, teacher qualifications, etc.) hardly register – if at all. For example, in my study of 199 North Jersey school districts the correlation between percentage FARM and test scores was 0.82. The percentage of minority students (black and Latino) was largely subsumed by percentage FARM but still added 0.02 to the explanatory factor. The school inputs (expenditures per student, instructional expenditures per students, student-teacher ratio) added only 0.03.

In short, (and certainly supported by scores of studies by more qualified educational researchers than I), in a nation where public education is largely based on neighborhood schools, "housing policy *is* school policy." Where a child lives largely shapes what kind of educational opportunity the child has – not in terms of how much money the school board is spending on the neighborhood school, etc. but in terms of who are the child's classmates (and, presumably, playmates).

And, frankly, most middle-class parents know this – they know it in their gut even if they're not familiar with the research. They're searching for neighborhoods with "good" schools, yet their definition of a "good" school has little to do with the quality of the principal, the teachers, the building, etc. (which they've rarely investigated). A "good" school usually means "a school filled with children just like ours" or maybe even a bit higher up the income scale. (Many Asian parents strain family finances to reach the highest income/highest performing local schools they possibly can, for example.) It's for this reason that the realtors in a number of states (including New Mexico) are prevented by law from characterizing or providing data on the local schools.

These are not radical ideas espoused uniquely by me; they have been proven over and over again over the past half-century by very rigorous research. It's just that most educators don't want to hear them. They'll say "we can succeed with any child regardless of the child's circumstances." And as parents and taxpayers we want them to be motivated by that belief in order to make a maximum effort for every child. But many will also concede that there are circumstances – namely, economically mixed and balanced classroom – where the children's and the teachers' likelihood of succeeding are much higher.

Creating Mixed-Income Classrooms

In the third memo I'll address some strategies for creating more mixed-income neighborhoods (mixed-income as contrasted by mixed-use is hardly

mentioned in the Comp Plan). Here I'll share a non-housing related strategy for creating more mixed-income classrooms.

The idea comes from Albuquerque itself. I present it here because there is probably very little institutional memory left in city government or APS. In the mid-1980s (after I had left office) the Martineztown community was faced with a challenge. Its long-standing neighborhood school, Longfellow Elementary, had been condemned by city building inspectors as structurally unsafe and would have to torn down. Neighborhood students would either be dispersed into other nearby schools or, if the parents could convince APS, enrolled in brand-new Longfellow Elementary (which, I believe, APS was reluctant to undertake).

With the visionary leadership of Frank Martinez, the then-Martineztown Improvement Association convened a joint meeting of city and APS officials to present an inspiring proposal. APS would both a) build a new Longfellow Elementary, and b) commit to provide a magnet-style, enhanced curriculum. The City would pay APS extra funds to operate the school beyond normal school hours in order to cover the full workday (7 am - 7 pm). The neighborhood association would commit to supporting a creative enrollment policy: no more than half the seats at the new Longfellow Elementary would be filled by neighborhood children (who were 90%+ FARM, mostly the poorer ones receiving fully-subsided meals); the other half would be reserved for the elementary school age children of Downtown office workers. And so it was. (And the program was duplicated shortly in a re-opened Lew Wallace Elementary to serve the Downtown Neighborhood Association area.)

The program was wildly popular with Downtown office workers. Many were single parents or two parents who worked in distant locations from their home. They faced a latchkey problem at 3 or 3:30 pm when school was over. Now such parents could drive their children downtown, drop them off at the school just a few blocks from where they worked, know that their children were in a high-quality educational program followed by adult supervised, after-school activities, and pick them up again at the end of the workday. May problems solved.

To suddenly have many higher income classmates boosted test scores and aspirations for the neighborhood children as well (though some of the academic progress seemed to erode when they graduated from Longfellow or Lew Wallace and went into a "regular" middle school).

And the program had a special bonus for the City. It boosted the attraction of buying into downtown neighborhoods by young, professional families with school age children. Before, they might love the old adobe or Sears-catalogue home but feel they could deal with a 90%+ FARM school; now, looking at a 50%

FARM school, they would say "it will be a challenge but we can make that work for our children" and they would add to the revival of such neighborhoods.

Sometime in the 1990s, this innovative program ended at Longfellow and Lew Wallace. I don't know the details, but a budget crunch may have ended city subsidies for the extended day programs. Checking their websites I see that both schools now maintain standard 8:45 am – 3:30 pm schedules. Too bad.

I think that the Comp Plan should aggressively promote reviving this vision. Having full-workday schools fits both the changing structure of the labor market, the changing profile of families, and the Comp Plan's goals of promoting greater concentration of employment in urban centers and employment centers.

Other school-city Comp Plan thoughts

I'll just list several briefly because I'm running out of time (Delcia and I are off tomorrow for Vermont and Boston for five days) and want to get this memo off to you before we leave.

- There really ought to be creative ways for the two major transit systems to collaborate, especially for transporting older students. I see that UNM and CNM students get free rides on ABQ Ride. Why doesn't that happen for APS students? APS could provide a modest subsidy to ABQ Ride for a fraction of the cost to the state school transportation budget of transporting older students in school buses.
- Joint development of school grounds-city parks and school-based community activity centers seems almost to be an afterthought in the Comp Plan.
- APS really ought to be a central partner in the land use planning process.

Got to go. Good luck.

David