

COMMENTS FROM INDIVIDUALS

Received prior to the 48 hour rule deadline of August 2, 2016 at 1 pm

Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Tuesday, August 02, 2016 8:46 AM
To: Lehner, Catalina L.
Subject: FW: EPC Coments

For the record. I'll be sending a bunch over in the next few minutes.

Thanks,
Terra

From: Gary Abeyta [<mailto:Gary@dynamicpropertiesofnm.com>]
Sent: Thursday, July 28, 2016 4:54 PM
To: Planning Comp Plan-UDO
Subject: EPC Coments

I just want to say that I think this is great what is being done to Re Zone, and I am for it 100%.

Gary Abeyta
Associate Broker
Dynamic Properties of NM LLC
Cell: 505-816-8439
Office: 877-887-8818
Gary@dynamicpropertiesofNM.com

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Reed, Terra L.

From: John Black <jblack@wwrealty.com>
Sent: Monday, August 01, 2016 5:33 PM
To: Planning Comp Plan-UDO
Cc: Lubar, Suzanne G.; Jim Strozier (cp@consensusplanning.com); ray@trombinos.com; Rusty Hugg; Pat Buck @ Zia Management; Wade Black (wblack@7bar.com)
Subject: Official EPC Comments on the ABC Comp Plan and City's new IDO Rezoning Plan
Attachments: 2016 City of Alb Re Zoning Project - East Coors Properties.pdf; 2004 Cottonwood Crossing EPC Plans Approved.pdf

Importance: High

Dear City Planning Department,

There appears to be some errors in the new IDO Rezoning Plan in terms of the commercial developments along the east side of North Coors Blvd between Paseo del Norte river crossing north to Alameda Blvd. (please see attached PDF).

I had met with the City planners on this matter before but I see know changes to reflect the existing commercial zoning we have in place. I am not sure what "MX L and MX T" but the brown and tan colors shown on these properties in your new plan appear to be some kind of residential zoning, not the existing commercial zoning we have. The subdivisions I am referencing in my attached PDF which shows the IDO proposed zoning and the existing zoning as well as aerial photos showing the existing developments in these subdivisions and the immediately surround areas. There are a lot of commercial buildings already built in these subdivisions and I am sure they will not accept the downzoning of their properties to a residential zoning, either. We want to cooperate with the City on the simplification of our zoning codes, but we are not cooperating on a down zoning of our properties.

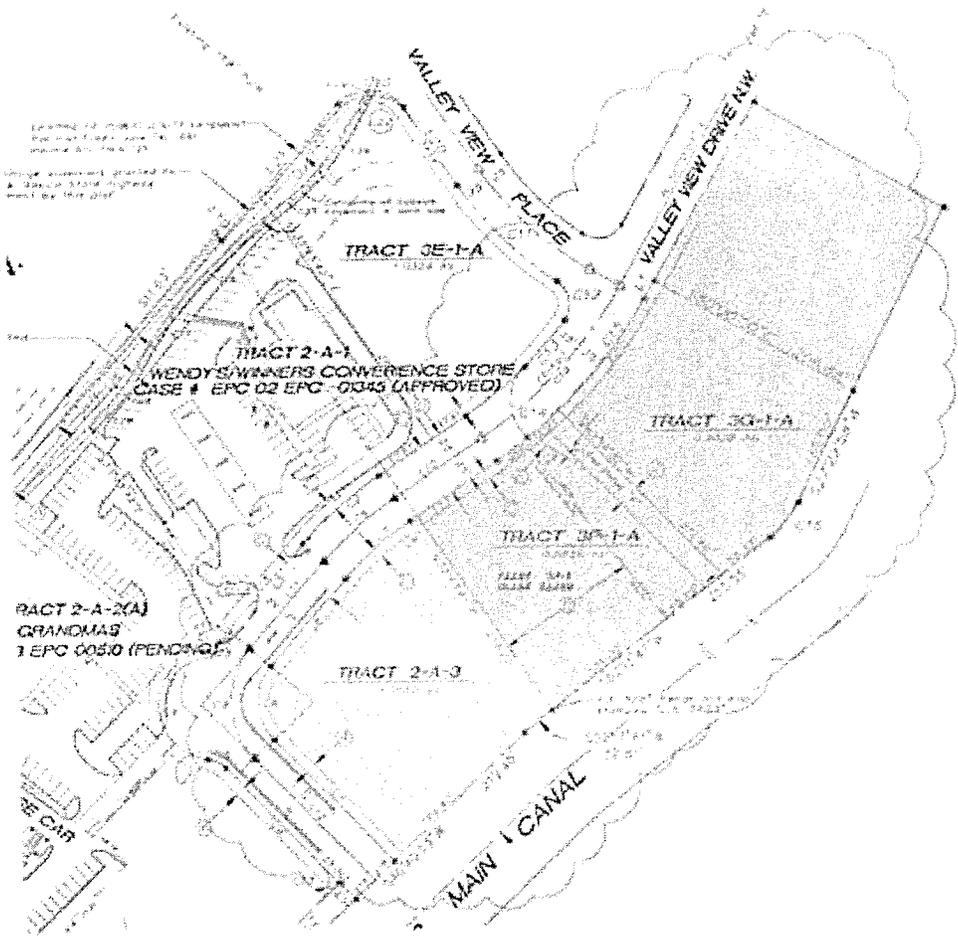
Look at the aerial photos supplied in my PDF and you will see a lot of existing commercial businesses and the few commercially zoned and developed vacant lots in between these existing businesses. These properties have been non-residentially zoned since the 1980's through the early 2000's. They are owned by myself and other people I sold the lots to several years ago at commercial prices. The commercial zoning for these lots were approved by the City and the adjacent neighborhoods. The new IDO Rezoning Plan appears to downzone even the existing businesses as well as the few remaining vacant commercial lots in these subdivisions. This downzoning is not acceptable nor appropriate for these properties. A lot of the existing property owners are not even aware of the current proposed zoning changes. Non-residential commercial zoning is the only appropriate zoning for all of these lots.

As an example of our existing zoning see the attached EPC approvals for the Cottonwood Crossing Phase II subdivision. The Black Ranch Subdivision Lots which are still vacant on or adjacent to Coors in our commercial sub division are zoned as follows:

Tract 2-A-3 The parcel in YELLOW below is zoned SU-1 for C-1 (Neighborhood Commercial) Permissive Uses & Hotel not to Exceed 2 Stories & Restaurant w/ Full Service Liquor. This parcel would allow for a "Green Jeans" concept with restaurant, brewery, retail sales, services, etc. all permissive with the exclusion of a drive up restaurant which is Conditional. This parcel is part of the Amended Site Plan for Subdivisions Tract 2 A approval and is subsequently governed by the design standards in place. The standards allow for a height of up to 32 ft. as long as the view corridor restrictions of the Coors Corridor Plan are met.

Tract 3F-1-A, Tract 3G-1-A, Tract 3H – All of these parcels in BLUE plus the adjacent Tracts 3I and 3J in the Black Ranch Subdivision are zoned straight O-1 (Office and Institutional). These parcels would allow as a CONDITIONAL USE the Retailing of food and drink, for consumption on premises or off, but not drive-in facility and provided that alcoholic drink is not dispensed for off-premise consumption in broken packages or the following packages within 500 feet of a pre-elementary, elementary or secondary school, a religious institution, a residential zone, a designated Metropolitan Redevelopment Area (as defined in the State Metropolitan Redevelopment Code), a city owned park or city owned major public open space:

- (a) distilled spirits, as defined in the New Mexico Liquor Control Act, in any package that contains less than 750 milliliters;
 - (b) beer, as defined in the New Mexico Liquor Control Act, in any single container labeled as containing 16 or fewer ounces; and
 - (c) fortified wines with a volume of alcohol of more than 13.5 percent, provided that retailing alcoholic drink, for on or off premise consumption, within 500 feet of a community residential program.
- If there are other uses being considered, we would need to go through the intended uses specifically for each tenant to ensure the zoning code would allow.



We request in the new IDO Rezoning Plan a zoning that is a “non-residential” commercial zoning that is at least as good as the existing zoning we have on these properties. I know the City is trying to clean up the old SU-zoning and replace it with straight zoning which we applaud, but we cannot tolerate a down zone on our properties in this new plan.

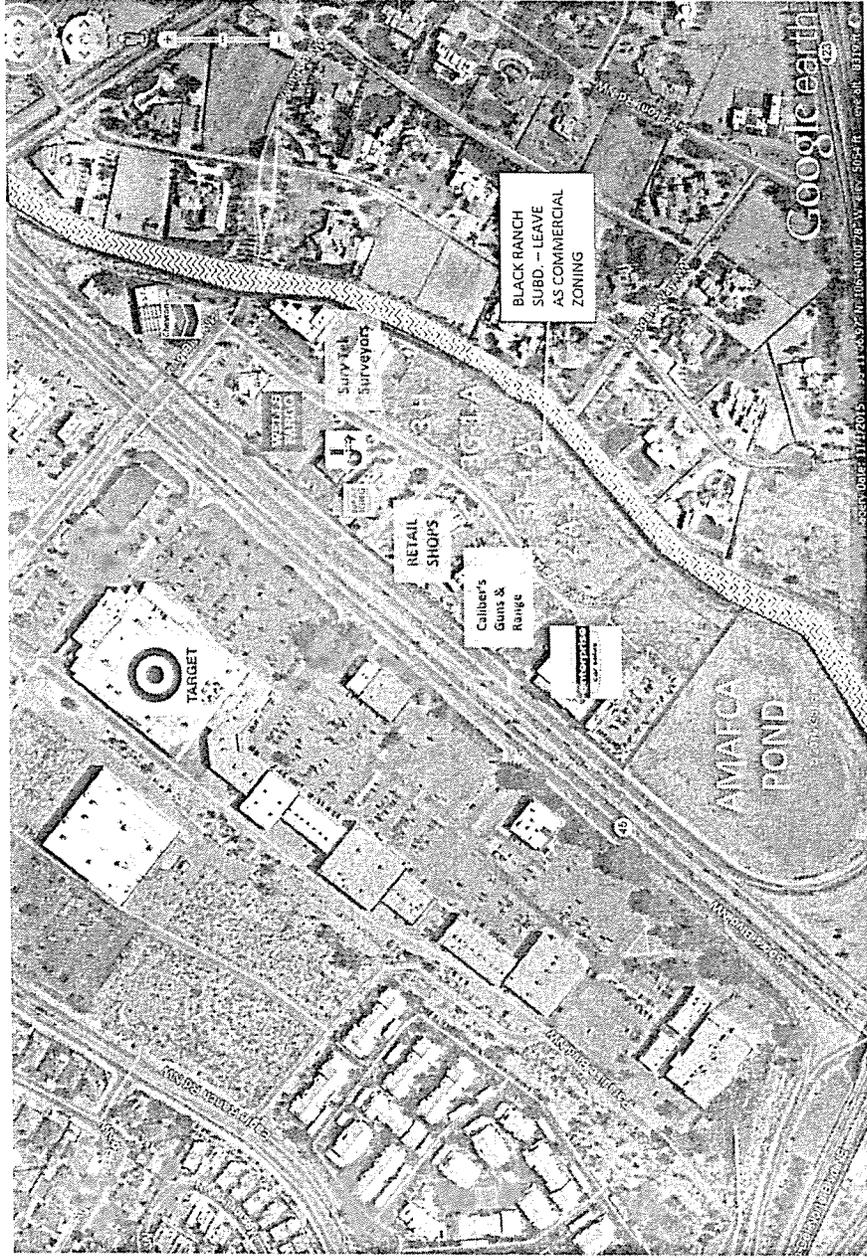
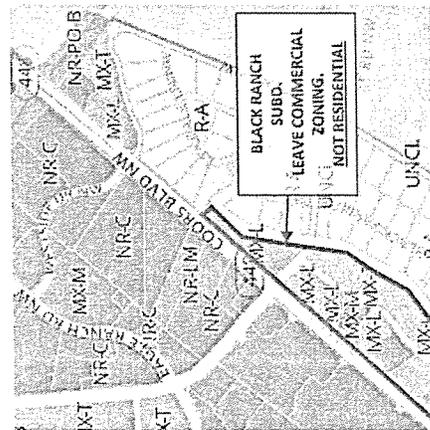
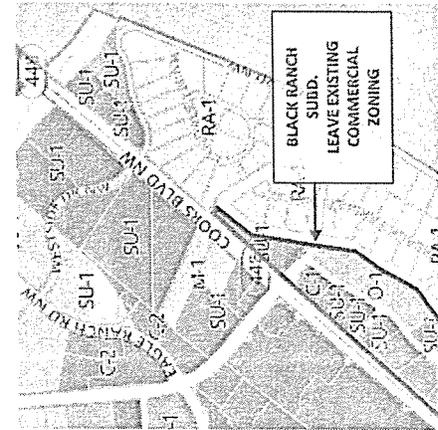
I will be willing to meet with you again and bring some of the other owners in these subdivisions with me. Somehow we need to resolve these issues before the EPC meeting if possible. Owner of several of these

lots, agent for some of these owners, and seller of all these lots in these subdivisions. Please call me at 505-228-9351 or e mail a reply to all of us with proposed changes to these new plans that we can accept.

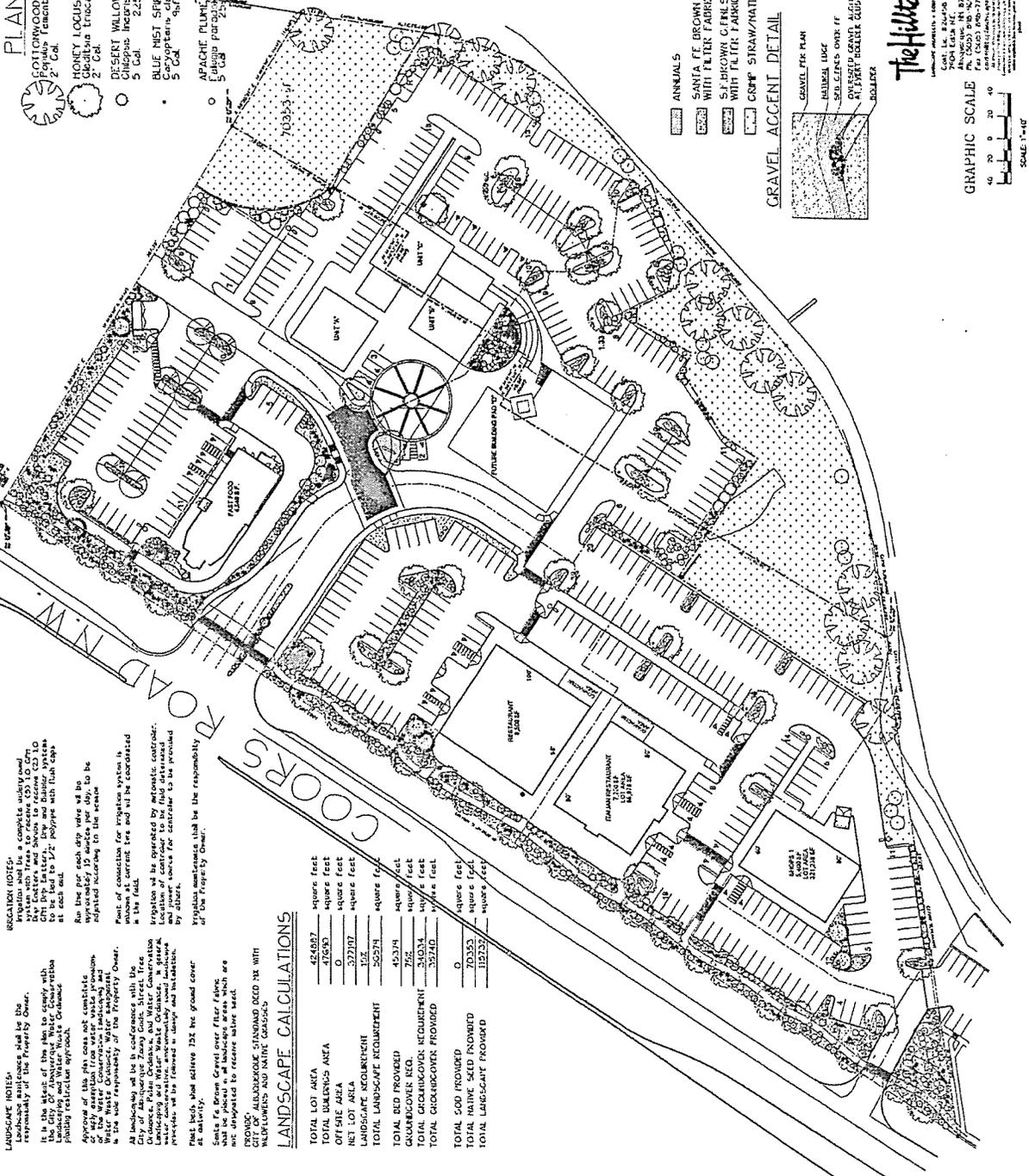
Sincerely Yours,

John Black,

BLACK RANCH SUBDIVISION COMMERCIAL LAND EAST OF NORTH COORS BLVD.



- ### PLANT LEGEND
- CHINESE PISTACHE (CH) 8
Pistacia chinensis
2 Cal.
 - AUSTRIAN PINE (CH) 8
Pinus nigra
6-15
 - NEW MEXICO OLIVE (CH) 23
Forestiera neomexicana
15 Cal.
 - MUGO PINE (CH) 1
Pinus mugo
5 Cal.
 - PALM TUCCA (LJ) 7
Hesperaloe parviflora
5 Cal.
 - MAIDENHAIR (CH) 134
Maconochilus stemple
5 Cal.
16sf
 - RUSSIAN SAGE (CH) 95
Perovskia atrisicyliaca
5 Cal.
25sf
 - INDIAN HAWTHORN (CH) 1
Raphanocarpus nudica
5 Cal.
16sf
 - TAM LAMPFR (CH) 75
Juniperus sibirica
5 Cal.
225sf
 - Autumn Sage (CH) 37
Salvia greggii
2 Cal.
9sf
 - RECAL MST (CH) 15
Habenaria ridgelyi
1 Cal.
1sf
 - THREADEGRASS (LJ) 19
Stipa tenuissima
1 Cal.
4sf
 - HONEYBUCKLE (CH) 110
Lonicera sempervirens
1 Cal.
200sf
 - CHAMISA (LJ) 128
Chrysothamnus nauseosus
1 Cal.
25sf
 - WILDFLOWER 119
1 Cal.
4sf
 - NATURAL EDGE
 - CONCRETE GRADE
 - STEEL BOLLING
 - OVER-SIZED GRAVEL
 - 17 BOULDERS



REGULATOR NOTES: Regulator shall be the responsibility of the Property Owner. It is the intent of this plan to comply with the City of Albuquerque Water Conservation Utility Restriction Approach. All landscaping will be in accordance with the City of Albuquerque Water Conservation Utility Restriction Approach. Irrigation will be provided in design and installation. Plant beds shall address 125 lbs ground cover. Santa Fe Brown Gravel over Filter Fabric. All plants shall be installed in accordance with the City of Albuquerque Water Conservation Utility Restriction Approach.

LANDSCAPE CALCULATIONS

TOTAL LOT AREA	424087	square feet
TOTAL BUILDING AREA	47693	square feet
OFF-SITE AREA	0	square feet
NET LOT AREA	377397	square feet
LANDSCAPE REQUIREMENT	125	square feet
TOTAL LANDSCAPE REQUIREMENT	369574	square feet
TOTAL BED PROVIDED	45219	square feet
GRASS/COVER REQ.	765	square feet
TOTAL GRASS/COVER REQUIREMENT	34934	square feet
TOTAL CHECK/COVER PROVIDED	33242	square feet
TOTAL SOB PROVIDED	0	square feet
TOTAL CHECK/COVER UNOBTAINED	20692	square feet
TOTAL LANDSCAPE PROVIDED	102232	square feet



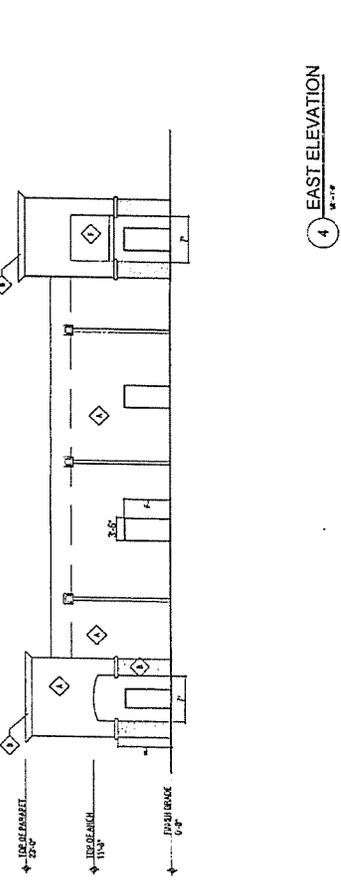
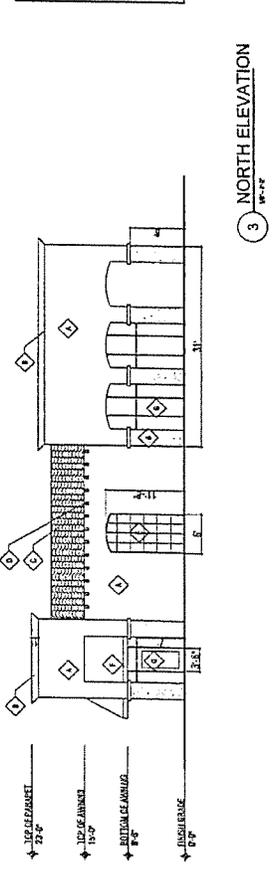
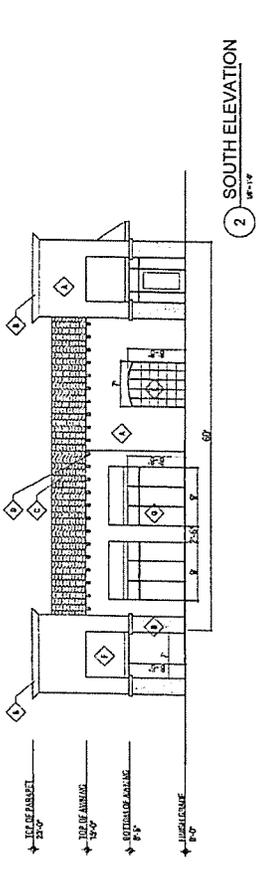
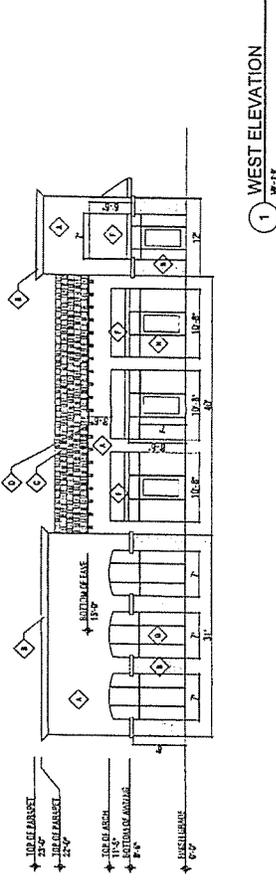
The Hilltop
 LANDSCAPE ARCHITECTS & PLANNERS
 1001 N. 24th Ave. Suite 100
 Albuquerque, NM 87104
 P: 505.263.9100
 F: 505.263.9101
 www.thehilltop.com

REV	DATE	BY	REVISION


GEORGE RAINHART ARCHITECT AND ASSOCIATES P.C.
 2225 SAN PEDRO N.E. SUITE 2-B
 ALBUQUERQUE, NEW MEXICO 87110
 PHONE (505) 884-9110 FAX (505) 837-9877

PROJECT TITLE: **COTTONWOOD CROSSING PHASE 2**
 PROJECT MANAGER:
 JOB NO.: DRAWN BY:
 DATE:

PROJECT TITLE	DATE	SCALE	SHEET
COTTONWOOD CROSSING PHASE 2	03-20-11	1/8" = 1'-0"	A2

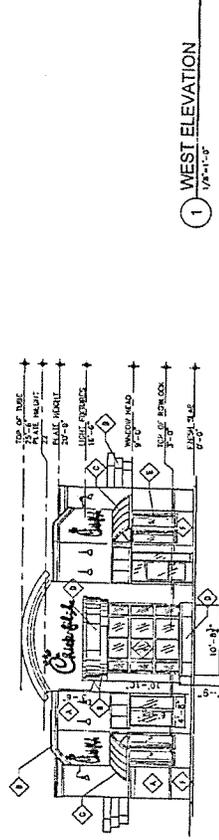


- EXHIBIT TO MATERIALS AND COSTS**
- 1. EXTERIOR WALLS: 4" CMU WITH 1/2" GYPSUM BOARD AND 1/2" SHEETROCK ON EXTERIOR SIDE.
 - 2. EXTERIOR WALLS: 4" CMU WITH 1/2" GYPSUM BOARD AND 1/2" SHEETROCK ON EXTERIOR SIDE.
 - 3. EXTERIOR WALLS: 4" CMU WITH 1/2" GYPSUM BOARD AND 1/2" SHEETROCK ON EXTERIOR SIDE.
 - 4. EXTERIOR WALLS: 4" CMU WITH 1/2" GYPSUM BOARD AND 1/2" SHEETROCK ON EXTERIOR SIDE.
 - 5. EXTERIOR WALLS: 4" CMU WITH 1/2" GYPSUM BOARD AND 1/2" SHEETROCK ON EXTERIOR SIDE.
 - 6. EXTERIOR WALLS: 4" CMU WITH 1/2" GYPSUM BOARD AND 1/2" SHEETROCK ON EXTERIOR SIDE.
 - 7. EXTERIOR WALLS: 4" CMU WITH 1/2" GYPSUM BOARD AND 1/2" SHEETROCK ON EXTERIOR SIDE.
 - 8. EXTERIOR WALLS: 4" CMU WITH 1/2" GYPSUM BOARD AND 1/2" SHEETROCK ON EXTERIOR SIDE.
 - 9. EXTERIOR WALLS: 4" CMU WITH 1/2" GYPSUM BOARD AND 1/2" SHEETROCK ON EXTERIOR SIDE.
 - 10. EXTERIOR WALLS: 4" CMU WITH 1/2" GYPSUM BOARD AND 1/2" SHEETROCK ON EXTERIOR SIDE.

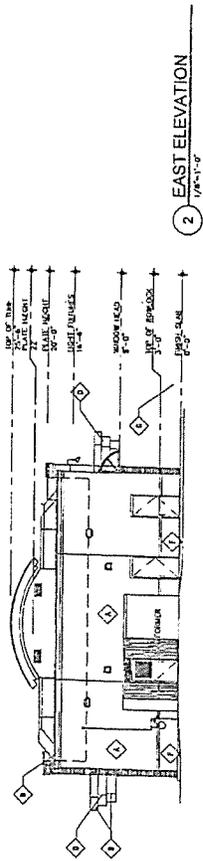
REV	DATE	BY	REVISION


GEORGE RAINHART ARCHITECT AND ASSOCIATES P.A.
 2925 SAN PEDRO N.E. SUITE 2-B
 ALBUQUERQUE, NEW MEXICO 87110
 PHONE (505) 884-9110 FAX (505) 837-8877

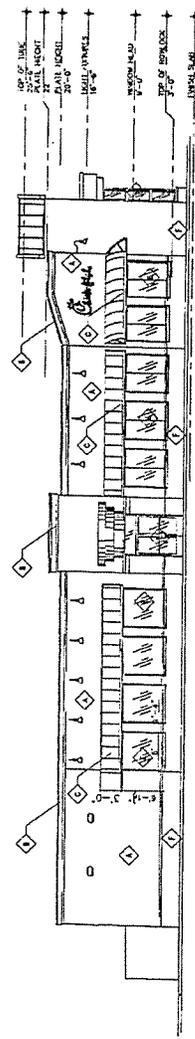
PROJECT TITLE		BUILDING ELEVATIONS	
DATE	07/12/03	PROJECT NUMBER	0203
SCALE	1/8" = 1'-0"	OWNER	DRONEZ AND SONS, BAR LOBBY
SCALE	1/8" = 1'-0"	DESIGNER	GEORGE RAINHART ARCHITECT AND ASSOCIATES P.A.
SCALE	1/8" = 1'-0"	DATE	07/12/03



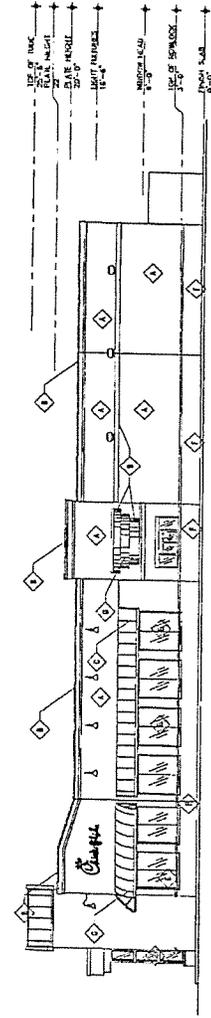
1 WEST ELEVATION
1/8" = 1'-0"



2 EAST ELEVATION
1/8" = 1'-0"



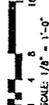
3 NORTH ELEVATION
1/8" = 1'-0"



4 SOUTH ELEVATION
1/8" = 1'-0"

LEGEND TO MATERIALS AND COLORS

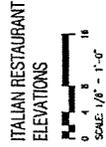
	BRICK
	CONCRETE
	GLASS
	WOOD
	PAINT
	ROOFING
	STAINLESS STEEL
	TEXTURED CONCRETE
	TRUSS
	WALL
	WOOD SHAKES
	WOOD TRUSS

CHICK FILLET
RESTAURANT ELEVATIONS

 SCALE: 1/8" = 1'-0"

REV	DATE	BY	REVISION

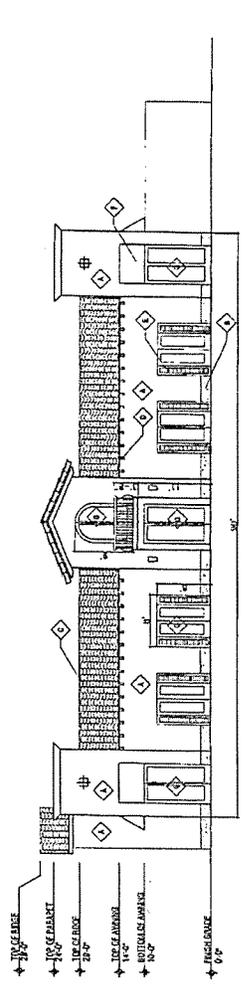
GEORGE RANHART ARCHITECT AND ASSOCIATES P
 2325 SAN PEDRO N.E. SUITE 2-B
 ALBUQUERQUE, NEW MEXICO 87110
 PHONE (505) 864-9110
 FAX (505) 837-9877

PROJECT TITLE	COTTONWOOD CROSSING PHASE 2
CLIENT	CS
PROJECT MANAGER	CS
JOB NO.	0099
DRAWING BY	CS
DATE	8/17/03
SCALE	1/8" = 1'-0"
SHEET NO.	A2.2

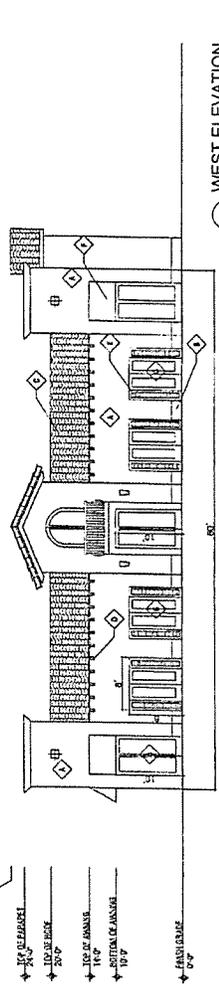


LEGEND TO MATERIALS AND COLORS

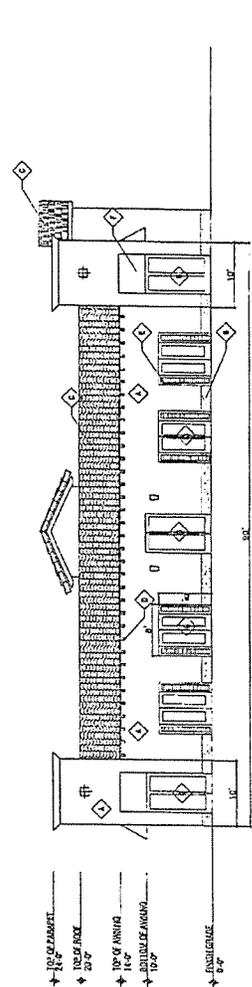
BRICK	BRICK
CONCRETE	CONCRETE
GLASS	GLASS
WOOD	WOOD
ROOF	ROOF
LANDSCAPE	LANDSCAPE
PAVING	PAVING
POLE	POLE
SCREEN	SCREEN
STAINLESS STEEL	STAINLESS STEEL
WOOD	WOOD



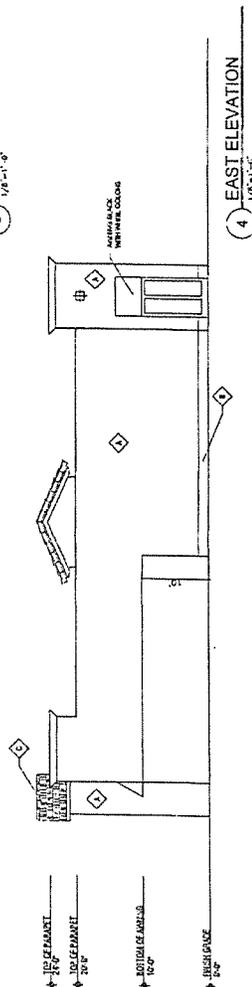
1 SOUTH ELEVATION
1/8" = 1'-0"



2 WEST ELEVATION
1/8" = 1'-0"



3 NORTH ELEVATION
1/8" = 1'-0"



4 EAST ELEVATION
1/8" = 1'-0"

ITALIAN RESTAURANT
ELEVATIONS

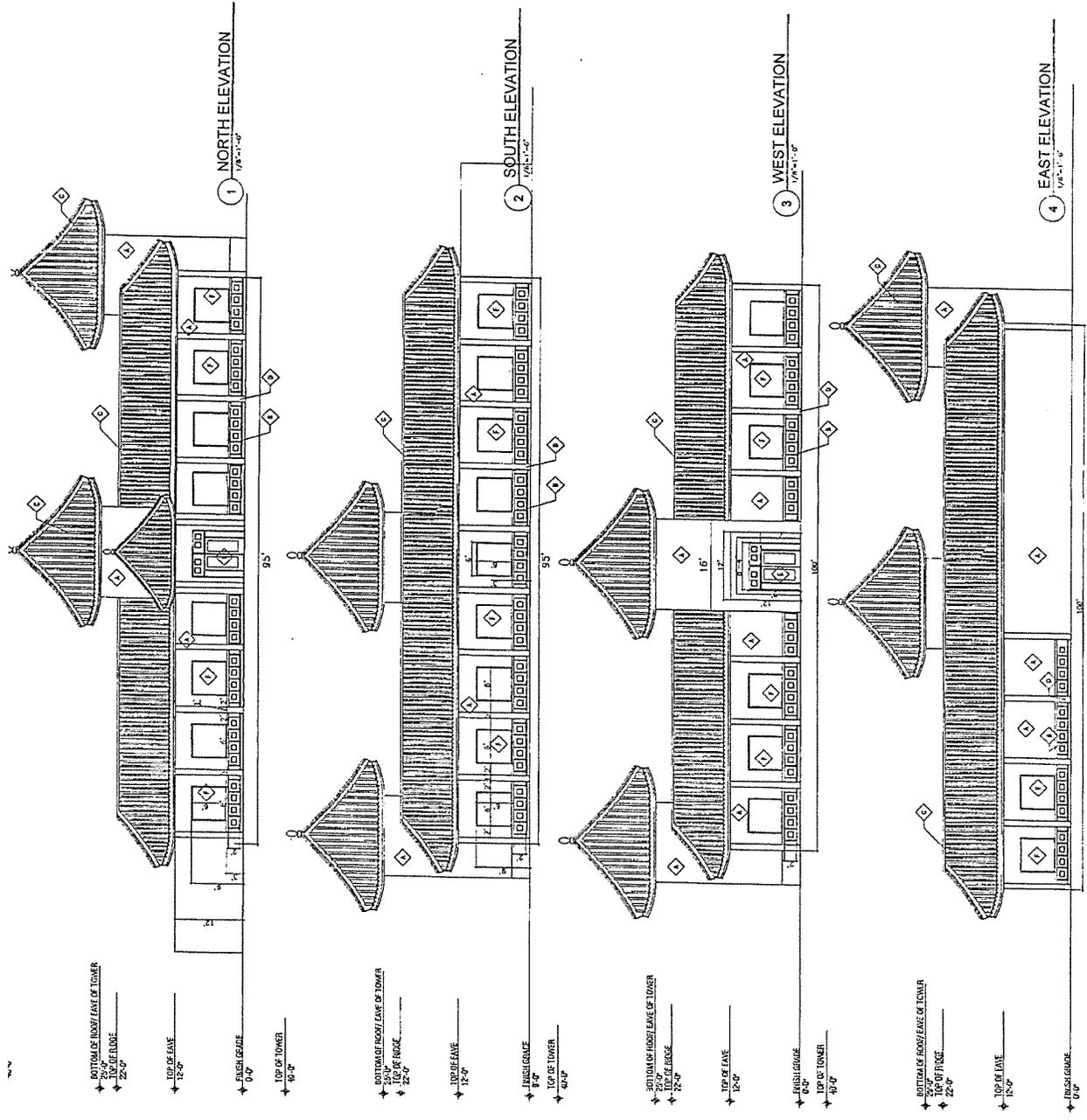
PROJECT TITLE COTTONWOOD CROSSING PHASE 2		SHEET A23	
DATE 6/12/03		SCALE 1/8" = 1'-0"	
DESIGNER COTTONWOOD CROSSING PHASE 2		DRAWN BY CS	
CHECKED BY CS		DATE 03/09	
GEORGE RAINHART ARCHITECT AND ASSOCIATES P. 2325 SAN PEDRO N.W. SUITE 2-B ALBUQUERQUE, NEW MEXICO 87110 PHONE (505) 884-9110 FAX (505) 837-9877			
REV	DATE	BY	REVISION

JAPANESE RESTAURANT
ELEVATIONS

SCALE: 1/8" = 1'-0"

LEGEND TO MATERIALS AND COLORS

- ◊ EXTERIOR WALL (SEE SECTION)
- ◊ EXTERIOR ROOF (SEE SECTION)
- ◊ EXTERIOR FLOOR (SEE SECTION)
- ◊ EXTERIOR CEILING (SEE SECTION)
- ◊ EXTERIOR DOOR (SEE SECTION)
- ◊ EXTERIOR WINDOW (SEE SECTION)
- ◊ EXTERIOR LIGHTING (SEE SECTION)
- ◊ EXTERIOR PLANTING (SEE SECTION)
- ◊ EXTERIOR SIGNAGE (SEE SECTION)
- ◊ EXTERIOR FINISHES (SEE SECTION)
- ◊ EXTERIOR MATERIALS (SEE SECTION)
- ◊ EXTERIOR COLORS (SEE SECTION)



Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Tuesday, August 02, 2016 1:07 PM
To: Lehner, Catalina L.
Cc: Renz-Whitmore, Mikaela J.; Toffaleti, Carol G.; Barkhurst, Kathryn Carrie
Subject: FW: Official EPC Comments on the ABC Comp Plan
Attachments: 201608021205.pdf

For the record.

Thanks,
Terra

From: Calvin Tanner Davis [<mailto:kalvin24@unm.edu>]
Sent: Tuesday, August 02, 2016 12:13 PM
To: Planning Comp Plan-UDO
Subject: Official EPC Comments on the ABC Comp Plan

Chair Karen Hudson,

Please review the attached comments.

Kalvin Davis, MCRP



August 2, 2016

Mrs. Karen Hudson, Chairwoman
City of Albuquerque
Environmental Planning Commission
600 second Street NW
Albuquerque, NM 87102

Re: Official EPC Comments on the ABC Comprehensive Plan with emphasis on proposed zoning in the Integrated Development Ordinance

Dear Mrs. Hudson,

Central is a major corridor of Albuquerque and a corridor along which the City has expressed the desire to see redevelopment. Yet, the prevalence of MX-M zoning rather than MX-H zoning will stifle the potential for redevelopment along the corridor. Consider that from Wisconsin ST NE (one block west of Wyoming) all the way to the I-25 there is no MX-H zoning. Yet there are already high rise and mid-rise buildings along the corridor.

The policies outlined in the May 2016 Land Use Chapter of the draft reiterate a desire for density that does not align with the proposed MX-M zoning along most of Central and will not encourage the desired development. For example Policy 5.1.1 c) states "encourage employment density, compact development, redevelopment, and infill in Centers and Corridors...", policy 5.1.10 a) and policy 5.1.11 a) state "encourage high-density residential developments within ¼ mile of transit stations," policy 5.3.3 states "encourage development that clusters buildings and uses," policy 5.4.1 a) states "prioritize higher density housing where services and infrastructure are available," policy 5.6.2 d) states "encourage higher-density housing and mixed-use development as appropriate uses that support transit and commercial and retail uses." Goals and policies outlined in the Housing chapter and elsewhere in the draft reinforce the desire for density along transit corridors.

As an experienced real estate developer, the clash between the Land Use goals and policies outlined and the proposed MX-M zoning along Central is obvious. Redevelopment is messy and hard, and the returns must be worth the troubles. MX-M zoning restricts buildings to four stories or less, and as a developer it is very challenging to redevelop a one, two or three story building into a four story.

The first issue is making the deal pencil out financially. Considering the costs of demolition, construction, etc., limiting redevelopment to four stories severely limits the potential for creative redevelopment projects, particularly on properties fronting Central that are non-standard block dimensions. Limiting redevelopment to four stories will require higher rental rates for commercial and residential tenants along the corridor. The ability

for new development to compete with the existing lower rental rates in the market depends on developers being able to provide desirable, modern spaces for a reasonable price per unit. Allowing more stories/density would permit redevelopment projects the economies of scale to add more residential or commercial units to offset costs and produce better, more affordable developments.

The second issue is securing the financing for redevelopment. Limiting redevelopment to a certain height reduces the ability for a developer to create large projects, which severely limits the potential for developers to explore creative financing packages. Speaking from experience, small financing deals are much more challenging to close than larger financing deals. Larger deals are easier for the developer to close and they also add more square footage to the market at a lower cost per unit. The most attractive financing in the market are the HUD insured lending programs under FNMA and GNMA. The programs that will finance mixed use have a cap of 20% commercial within a project. In order to stay under that cap, for a building with a regular footprint (the most efficient foot print) to have commercial uses on the first floor, it needs to rise five stories to meet the cap. It is imperative that in those parts of the corridor where commercial space is needed at the ground floor to maintain good urban form, five stories be permitted.

If the City is serious about the goals and policies related to multifamily housing and mixed-use development outlined in the Land Use Chapter of the draft, then it should adopt zoning regulations that will support developers in realizing those goals and policies. If the City wants to see redevelopment, which it does, according to the Land Use goals and policies, then it needs to allow for more density in its zoning along Central and other corridors that will have bus rapid transit serving the corridors. To truly encourage redevelopment along Central, the City should strongly consider changing all of the MX-M zoning to allow five stories, or change the zoning along the bus rapid transit corridors to MX-H zoning or MX-FB zoning and remove the four story limit along the corridor. The City should also strongly consider changing all of the MX-L zoning within 4 blocks of Central to MX-M.

Thank you for your consideration of these comments.

Sincerely,

Geltmore LLC



Paul L. Silverman

CEO/Manager

Geltmore LLC

Suite 130

6211 San Mateo Blvd. NE

Albuquerque, NM 87109-3534

Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Tuesday, August 02, 2016 1:04 PM
To: Lehner, Catalina L.
Cc: Barkhurst, Kathryn Carrie; Toffaleti, Carol G.; Renz-Whitmore, Mikaela J.
Subject: FW: Official EPC Comments on the ABC Comp Plan

For the record.

Thanks,
Terra

From: Renia Ehrenfeucht [<mailto:rehrenfeucht@unm.edu>]
Sent: Tuesday, August 02, 2016 11:57 AM
To: Planning Comp Plan-UDO
Subject: Official EPC Comments on the ABC Comp Plan

Chair Karen Hudson,

I commend the City for developing a forward thinking Comprehensive Plan and working towards an Integrated Development Ordinance that simplifies the guidelines and regulations. These greatly increase the likelihood that future change and development is consistent with City's vision and goals.

I also commend the staff for developing a contemporary Comprehensive Plan that recognizes the city's form and character (and the ongoing dominance of auto travel and trucking) but also presents visions for change such adding main streets corridors to reflect the trend towards walkable destinations and neighborhoods.

I have a few more specific comments.

Sector Plans versus a Comprehensive Plan

I have attended many meeting and I hear how strongly residents favor their sector plans. However the problem with having so many individualized plans is twofold. First, the sector plans can conflict with other city documents, creating a confusing regulatory environment. This leads to decisions and outcomes that some party thinks is unfair. Second, not all neighborhoods have sector plans or the same resources to dedicate to their plans so the individualized system can lead to unjust outcomes. I strongly support having a comprehensive plan that is responsive to the neighborhoods' unique characteristics but also creates processes and policies that ensure that ALL neighborhoods have the same planning resources. I support integrating the sector plans into one comprehensive plan.

Allowing Change

The "Areas of Change and Areas of Consistency" framework is an effective way to recognize that city and region will change but that there are qualities that residents value and want to retain. This creates the basis for responsive design in areas that are designated areas of consistency and innovative interventions in areas of change.

Flexible Housing

I respectfully suggest that the housing chapter does not go far enough. Demographic trends suggest we have smaller households (including single person) which are not well served by single family houses. This trend is expected to continue. Allowing singles to be converted to doubles and allowing secondary dwelling units in addition to allowing tiny houses (as described in the housing chapter) or very small houses (as complete dwelling units) and small lots would create more flexible housing without substantially changing single family residential character. This also creates a range of opportunities for affordable housing and affordable home ownership and, as household size declines, it retains population density. In addition, it is also critical that alternative land tenure such as co-housing or community land trusts are allowed, that manufactured housing communities are preserved, and new manufactured housing communities can be established.

Planning can be controversial and frustrating. I attended many of the meetings. I have been impressed by the city staff, which has genuinely engaged with residents, listening but also responding with real discussion rather than simply allowing people to speak. They maintained good spirits and professionalism throughout (which, for example, has not been the case in all the ART meetings). Albuquerque is lucky to have such talented people working towards our future!

Respectfully,

Renia Ehrenfeucht

Renia Ehrenfeucht
Professor + Director
Community and Regional Planning
School of Architecture + Planning
University of New Mexico
rehrenfeucht@unm.edu

Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Tuesday, August 02, 2016 8:47 AM
To: Lehner, Catalina L.
Subject: FW: Official EPC Comments on the ABC Comp Plan

For the record.

Thanks,
Terra

From: Don Hancock [mailto:srcidon@earthlink.net]
Sent: Monday, August 01, 2016 9:29 AM
To: Planning Comp Plan-UDO
Subject: Official EPC Comments on the ABC Comp Plan

Chair Karen Hudson,

I'm re-submitting comments that were submitted on June 24, 2016 by Don Hancock, Joseph Aguirre, Julie Kidder, and Eugene Trosterud to "[Mikaela Renz-Whitmore, mrenz](mailto:Mikaela.Renz-Whitmore@cabq.gov)"@cabq.gov and [awebb](mailto:awebb@cabq.gov)@cabq.gov.

The comments were generally not incorporated into the revised EPC draft, resulting the inconsistency in Chapter 7 not being addressed. We believe that EPC's consideration of the following comments is important.

Thank you.

The June 24 comments:

Thanks for having the one-on-one meeting with Don Hancock on May 26 and the public meeting on Monday, June 13.

The four signers are all residents of the University Heights area.

We generally agree with the priorities in the Comprehensive (Comp) Plan of Improving Economic Opportunities, Protecting Our Neighborhoods, Enhancing Quality of Life, Improving Mobility & Options for Transportation, Protecting Our Cultural and Natural Resources, and Promoting Sustainable Development. P. 1-12. However, "safe" transportation options must be included as part of enhancing quality of life (as it is included in the transportation priority) because existing unsafe transportation through our neighborhood is a serious detriment to quality of life. That specific example can be a general reality that should be acknowledged in the Comp Plan.

Likewise, we generally agree with the six guiding principles of strong neighborhoods, mobility, economic vitality, equity, sustainability, and community health. P. 3-5. But we believe that "safe" mobility options should be explicitly stated. Further, we request that the text on page 3-6 be revised to state that the local transportation network will give people a variety of options for traveling safely and efficiently within and between neighborhoods and to Centers and Corridors around the city and county, while protecting the safety and health of those living and working along the transportation network.

We are concerned that because the Comprehensive (Comp) Plan overrules other plans and ordinances, as stated on page 1-9, over-specificity in the Comp Plan can have serious negative impacts in specific instances. For example, the Comp Plan is extremely specific about how many feet from a certain area requirements apply. There are no caveats, such as “generally” or “in most instances” for those dimensions. The only specific counter-balance appears to be: “Areas of consistency that are within Centers and Corridors will be protected by policies to limit densities, new uses and negative impacts from nearby development.” P. 5-21.

An apparent inconsistency is in Chapter 7, page 7-22. Action 7.4.1.1 states “Use residential permits or zone parking permits to prevent the intrusion of outside parking within neighborhoods.” However, Policy 7.4.2.b)iii provides: “Credit on-street parking toward parking requirements.” In areas, such as University Neighborhoods on-street parking cannot be given where there are residential on-street parking permits. Thus, we’d suggest changing 7.4.2 to state: “Credit on-street parking toward parking requirements, except where residential parking permits are used.”

We are very concerned about the elimination of the Sector Development Plans, including the University Neighborhoods Plan, before the Community Planning Area (CPA) assessments are completed. The draft Comp Plan states: “In the future, the City plans to replace sector planning efforts with a proactive, ongoing five-year cycle of assessments of Community Planning Areas to understand the pressures and needs of neighborhoods and recommend updates to policies in the Comp Plan, regulations in the zoning code, and/or implementation steps for agencies and departments.” P. 1-10. We oppose eliminating the Sector Plans now and request that the Comp Plan state that provisions of Sector Plans not specifically superseded would remain in place until the CPA assessments are adopted.

The University Neighborhoods was the first “pedestrian orientation” designation, through the 1978 Sector Plan. We also have a lot of experience with increased density, and too much density, which resulted in the City Council reducing zoning density in 1978. Thus, we suggest that a sentence be added on page 5-1, after the second sentence in the second paragraph:

Too high-density development also is not compatible with our vision.

We appreciate the use of maps in the draft Plan and encourage expanded use of interactive maps. The Appendices D and E list the Activity Centers and Corridors is essential to supplement the maps. They are also necessary for consistency in the Plan. For example, page 5-9 includes Nob Hill as an Urban Center. Is that correct? We’re unaware of that as a previous designation. We’d also suggest that the Plan include either the specific boundaries of Activity Centers and Corridors or state that there are no precise boundaries.

We appreciate your work and your consideration of these comments.

Reed, Terra L.

From: aboard10@juno.com
Sent: Tuesday, August 02, 2016 1:17 PM
To: Planning Comp Plan-UDO
Subject: Official EPC Comments on the ABC Comp Plan
Attachments: TRNA Comments.docx; Comparing Matrix to CCP to the ABC-Z Draft.doc; NWMEP comparing to ABC-Z draft.doc

Chair Karen Hudson,

Here are my comments regarding the ABC-Z Plan. Please let me know that you recieved them. Please see attachments.

Thank you,

Rene' Horvath

TRNA

August 2,2016

Dear Chairwoman Hudson and fellow Commissioners,

I have attended most of the meetings regarding the ABC-Z Plan. I am concerned how the proposed changes will affect our Communities. The current Comp Plan was adopted in 1975, and has been updated several times over the years. Many of the goals and policies are still relevant today.

Albuquerque Sector and Area plans were developed to ensure that future development would fit the character of our historic neighborhoods, and compliment the natural, cultural, and scenic landscapes. They are more meaningful when they remain intact, and not separated into different documents.

Trying to combine all three Rank I, II, III plans into one ABC-Z Comp Plan is a huge undertaking. This is more than an update. More time was needed to understand it.

The West side has 6 Area and Sector plans. I tried to review 2 of them, the Coors Corridor Plan and the North west mesa Escarpment Plan, and how they compare to the ABC-Z Comp Draft Policies. I was not able to completely review all of it. More time is needed.

My concern is that the Coors Corridor Plan has served our community well. It still represents our Neighborhood values. One reason the plan was created was to preserve the scenic beauty along the river corridor. That should not be changed in any way.

As I reviewed the Coors Corridor Plan I soon realized that the vision for Coors has changed from a Principle Arterial to Premium Transit Corridor. A Premium Transit Corridor has a totally different land use development pattern and road design than a Principle Arterial Roadway. This changes a lot. The community needs to know what is the plan for Coors Blvd.

The ABZ-Draft also does not address the Sector Plan Regulations. It is our understanding that the regulations will be in the IDO when it gets completed. So we don't know at this point how the regulations will turn out.

I am sending you my analysis comparing the ABC-Z Plan Policies to the Coors Corridor Plan and the North West Mesa Escarpment plan.

Thank You,
Rene' Horvath
TRNA Land Use Director

Coors Corridor Plan / Matrix/ ABC-Z Draft Comparisons:

Comments are in Blue

Rene' Horvath -TRNA August 2, 2016

I reviewed Policies from the Coors Corridor Plan that are listed in the Matrix and compared those policies to the policies in the ABC-Z-Comp Plan draft. The Matrix is a list of most of the policies taken from all the current Rank 1, 2 and 3 Plans. These policies were combined into a generalized policy that is now in the ABC-Z Draft. These ABC-Z policies will replace our existing Comp/ Area and Sector policies. Once the ABC-Z Comp Plan and the IDO are approved our current Sector and Area and Comp Plan goes away. It is our job to determine if we think this way of planning is going to work for us and the whole city. Does the final result reflect the values of our current Sector and Area Plans? Are they strong enough to ensure protection of our neighborhoods and the things the citizens care about? Here's how the Coors Corridor Plan policies and ABC-Z Policies compare.

1) Matrix (226) (pg.28) from the **Coors Corridor Plan: Principle Arterial – Policy 1** (pg. 11): Coors Blvd. shall be designed to improve traffic carrying function as a major north-south arterial for the Northwest Mesa area. (See ABC-Z - Transportation, policy 6.2.8.f).

The ABC to Z Plan policy reads:

Policy 6.2.8: Auto Network: Prioritize automobile travel on Commuter Corridors and balance it with other travel modes on other streets.

Policy 6.2.8.f : See MRCOG Access Control Policy for access-controlled arterials and intersections and Development Process Manual for access and intersection spacing standards for non- access controlled arterials.

Comment: The Coors Corridor Plan (CCP) policy above designates Coors Blvd. as a Principle Arterial. The ABC Policy is about commuter corridors. In the ABC-Z draft plan there is a map

on page 5-15 that shows Coors Blvd. as a Premium Transit Corridor. What is a Premium Transit Corridor? The 6.2.8.f policy directs the reader to other documents - the "MRCOG Access Control policy" and the "Development Process Manual" for transportation information. The Neighborhoods do not have the Development Process Manual to review. The nice thing about the CCP, all this information is in one document, so its easily available to the reader.

2) Matrix #(227) (pg. 28) from CCP policy 10, Noise Standards, (pg. 44): The City Transportation Department shall coordinate with the State HWY Dept. to perform a **Noise level analysis** at the time of the roadway engineering design phase. These dept.'s shall also recommend and coordinate noise mitigation measures that represent a reasonable balance between public expenditure and social, economic, and environmental values of the community. Mitigation measures shall be in accordance with the design guidelines and policies contained in the Coors Corridor plan. See ABC-Z policies: 4.1.4.a and 6.2.8.f, 6.4.3, 6.4.3.1, 6.4.3.2

Note: The Matrix left out the CCP rationale for Noise Standards that reads. Traffic and roadway noise is a nuisance ... Coors Blvd. should be designed and constructed so that noise levels are controlled within acceptable standards.

Comment: The Matrix does not include the Coors Plan rationales (above) that explain the reason behind the policies. Sometimes the rationale is helpful by being more explanatory or more direct. The above CCP rationale is more direct and should be included as a policy in the ABC-Z Plan.

The ABC-Z Draft reads:

Policy 4.1.4.a: Neighborhoods: Promote neighborhoods and traditional communities as key to our long term health. (a) Respect existing neighborhood values and social, cultural, recreational, resources.

Policy 6.2.8.f: Auto network: See MRCOG Access Control Policy and Development Process Manual.

Policy 6.4.3: Noise: Mitigate traffic noise along roadways using measures that represent a reasonable balance between public expenditure and social, economic, and environmental values of the community. OK

6.4.3.1: Analyze noise impact of roadways on proposed noise -sensitive uses (eg. Hospitals, daycares, schools, and residents) adjacent to existing arterial streets. 6.4.3.2: Analyze and mitigate projected traffic and noise impacts of proposed street widening and similar projects upon adjacent neighborhoods and uses.

3) Matrix (228) pg. 29 and the CCP (pg.46) State HWY Dept. / I-40 and Coors interchange improvements. The Matrix notes that these improvements have already been – Staff: This has been “Accomplished”.

4) Matrix (229) (pg.30) is CCP(pg.14) - Policy 2: ROW: The City shall acquire **Additional ROW for Coors Blvd.** from Central to Corrales, to achieve a minimum of 156 ROW. ... additional 5 ft. ROW ... on approach to intersection to provide for an exclusive right turn lane. ... Additional 12 ft. ROW required for exclusive right turn lane for driveways... Additional 11 ft. ROW required at intersections between Central and Fortuna to provide for the existing bike lane and sidewalk... Until an alternate route for bike trail can be implemented. See ABC-Z - Transportation, policies: 6.1.4, 6.2.8.f, 6.7.2.b

Note: CCP rationale, (not in the Matrix), reads: The **UTPPB – Urban Transportation Planning Policy board** - has adopted a policy stating Coors Blvd., from I-40 to Corrales, a **Principle Arterial, high capacity, limited access facility**, having a 156 ft. wide ROW.

Comment: The Rationale above is not in the matrix, but it mentions that the UTPPB designated Coors Blvd. a Principle Arterial in the CCP. This is why Coors Blvd. is designed the way it is. The ABC draft has a different designation for Coors Blvd. that replaces Coors as a “Principle arterial”. See policy below.

ABC-Z - Transportation - Policies:

Policy 6.1.4: Premium Transit Corridors: Prioritize transit vehicles within the travel way and transit users in street design and improvements, incorporating

pedestrian amenities, such as bulb-outs, pedestrian activated signals, and refuge medians at intersections and near transit stations. (endnote (10) – City of Albuquerque Council Bill O-14-27, enactment No. O-2015-003.)

Policy 6.2.8.f: See MRCOG Access Control Policy and Development Process Manuel. (Same as above).

Policy 6.7.2: Regional Systems: Coordinate across transportation agencies to plan a transportation system for the region. (b) Follow design recommendations in the Long Range Transportation System Guide for functional classification and appropriate access management strategies, roadway design guidelines, and guidance on ROW width. (ABC)

Comment: We did not know that Coors was labeled a Premium Transit Corridor, until the draft plan came out. How does this change Coors? While we have always been supportive of transit this kind of designation may not work for us. How will the land use change? How much density is needed for a Premium Transit Corridor? What happens to the views? What will happen to the remaining rural areas along Coors; such as Alban Hills and the farm like areas near the Open space visitor Center? There needs to be a discussion with the Community of the City's plans to transform Coors Blvd. into a Premium Transit Corridor.

5) Matrix (230) (pg.30) is CCP (pg.170) Policy 3: Control of access and

driveways: Vehicle access to Coors Blvd. shall be limited to protect primary function as a major traffic carrier. Driveways shall not be permitted within 400 ft. approaching major signalized intersection... 150 ft. on the departure side. The intent is to limit the number of allowable driveways... In a typical quarter mile segment no more than three driveways shall be permitted per side of the corridor. If driveway design does not provide access to a property, then the Traffic Engineer shall consult with City planner to consider alternatives to provide access to that property. ... Traffic Engineer makes final determination. City shall work with property owners, developers, neighborhoods, and residents to establish a circulation system to provide alternative access opportunities to properties from facilities other than Coors Blvd. Alternative access for adjacent properties shall be developed before direct access points to Coors Blvd. are closed. See ABC-Z policies 6.2.8.f and 6.7.2.b

Note: The CCP Rationale, pg. 17, (not in Matrix), reads: **Controlled access provides better traffic flow** and safer traffic operations. Anticipated traffic flow on Coors requires design solutions that favor safe and effective movement of vehicles.

Comment: The Rationale helps to educate the reader the reason for the controlled access along Coors Blvd. It is for better traffic flow. The ABC-Z plan has all the traffic information in another document. The CCP had all this information in one document.

ABC-Z draft policies 6.2.8.f and 6.7.2.b: Same as above.

Policy 6.2.8.f: See MRCOG Access Control Policy and Development Process Manuel.

Policy 6.7.2: Regional Systems: Coordinate across transportation agencies to plan a transportation system for the region. (b) Follow design recommendations in the Long Range Transportation System Guide for functional classification and appropriate access management strategies, roadway design guidelines, and guidance on ROW width. (ABC)

6) Matrix (231) (pg.31) from **CCP** (pg. 22) – **Policy 4: Medians:** Median Openings will be permitted only at the major ½ mile signalized intersections. The medians shall be built to a 28 ft. width to provide area for dual left turns at major intersections, landscaping, drainage, and other necessary improvements. All other median opening cuts shall be closed when the midpoint of level of service D is reached in that segment of roadway. Close existing median openings not being used for access to developed properties from St. Josephs Drive north. Install median from Montano north to its ultimate design width. See ABC-Z policies 6.2.8.f - See MRCOG Access Control Policy and Development Process Manuel.

Note: The CCP Rationale, (not in Matrix), states: **Left turn is the most disruptive movement along any traffic-carrying facility.** In order to encourage and maintain a reasonable traffic flow on a major traffic carrying facility, this movement must be limited and controlled to ensure smooth and safe operation of the roadway with high traffic volumes.

Comment: The Coors Corridor Plan (CCP) provides the reader with details on when median should be closed. The Rationale explains that left turns are disruptive movement to traffic flow. Details like this have been helpful to the community to understand the function of the roadway and why it is designed this way.

7) Matrix (232) (pg.31), from CCP (pg. 23) - Policy 5: Intersections: Distance between major intersections on Coors Blvd. shall be as far apart as possible and practical to encourage continuous traffic flow.

There shall be minimum distance of approximately ½ mile for signalized intersections. Limited access locations for right-turn-off and right-turn -on traffic movements shall be placed with careful consideration for proximity to full intersections and to provide reasonable access to property within the corridor. Limited access locations shall be a minimum distance of approximately one quarter mile from full intersections or from other limited access locations.

An exclusive right-turn- lane shall be provided at all major one half mile signalized intersections and one quarter mile right- turn only intersections.

At the signalized one- half mile intersections a radius sufficient to accommodate channelized right-turns shall be utilized to improve pedestrian crossing time and by reducing crossing time and by providing a pedestrian refuge area, as well as enhancing vehicle operation. The specific design shall be determined by Traffic engineer.

The proposed traffic signals shown along Coors shall be installed when the warrants contained in the NM Manuel and specifications for a Uniform System of Traffic control devices are met at each location. See ABC-Z policies 6.2.8.f (MRCOG Access Control Policy and Dev. Process Manuel) and 6.7.2.b. (design recommendations in the Long Range Transportation System Guide for functional classification and appropriate access management strategies).

Note: The CCP Rationale, not listed in Matrix, states: Maximum distance between traffic signals and ... limited access is essential to accommodate the best possible traffic flow and the anticipated traffic volumes on Coors. One-half mile spacing for signalized intersections will allow speeds in the 35-40 mph along Coors.

Comment: All the traffic information in the CCP is in the "Traffic movement/ Access/ Roadway Design" section. It educates the reader the reason Coors Blvd. is designed as a Principle Arterial with limited Access - with traffic lights spaced ½ mile apart, limited driveway access, limited median openings, which keeps the traffic flowing at a certain speed. The ABC-Z plan does not provide this information, because it's carrying too much information already.

Below are the following policies related to streetscapes, transit, trails and view sites.

8) Matrix (233) (pg. 32) from **CCP** (pg.36) – **Policy 6: Streetscape:** Streetscape improvements for Public ROW shall be required.

9) Matrix (234) (pg. 32) from **CCP** (pg.38) – **Policy 7: Public view sites:** Public view sites shall be provided at appropriate locations along Coors and within the Corridor as suggested on the recommended land use plans. (See **ABC-Z policy: 11.3.1.d - Heritage Conservation** chapter. Also specific views sites should be addressed through a view protection overlay, **handled in the IDO.**)

Note: Rationale in CCP pg. 38, also states: Coors Blvd. ... offer some of the finest scenic views in the Albuquerque area which will be more easily enjoyed at the public view sites at appropriate locations.

Comment: In the past the development community has offered to build view platforms long Coors or to use view corridors such as arroyos or streets to preserve views for the public, in order to build taller buildings. The Coors Corridor plan promotes the preservation of the panoramic views of the Bosque, Valley, and Mountains which the public has always enjoyed, and considers a community asset.

ABC-Z - Heritage Conservation - Policy 11.3.1: Natural and Cultural Features: Preserve and enhance the natural and cultural characteristics and features that contribute to the distinct identity of communities, neighborhoods, and sub-areas. (end note (27) – Says this policy is taken from current Comp Plan, Barelvas, North I-25, NW Mesa Escarpment Plan, Volcano Cliffs, and Vol. Hts. Vol. Trails, WSSP.)

Policy 11.3.1.d: Protect important views from Public ROW along key corridors and from strategic public locations through regulations on building height limits, site layout, and street orientation. (end note (31) – CCP (234,257,270,271), North I-25, NWMEP, SW Area Plan,, Uptown, Vol. Cliffs,Vol. Hts. Vol. Trails, WSSP)

Comment: Ask staff how they plan to preserve views along Coors, based on this policy.

10) Matrix (235) (pg.32) & CCP (pg. 40) - Policy 8: Walks and Trails: Where appropriate, roadway design shall provide for pedestrian and bicycle traffic and horse trails. Preferably trails will be off Coors Blvd. See ABC-Z -Transportation, policy 6.2.6

CCP pg.40 Rationale also adds: Land uses in Coors Corridor ... should be connected with a multi-purpose network of access and circulation.

ABC-Z - Transportation Policy 6.2.6: Equestrian Network: Follow guidance on equestrian facilities in the Bikeways & Trails Facility Plan; the Bicyclist and Pedestrian Safety Action Plan; and the Parks, Recreation, and Open Space Plan. (endnote (49) – CCP (235), Rio Grande Corridor plan (707, 710)

Comment: Too many plans to refer to. I thought the idea was to consolidate the plans to make things simpler and easier to find by the reader. It seems a summary of the intended goal is needed.

11) Matrix (236) (pg.32) and CCP (42) - Policy 9: Public Transportation and transportation management program: The City and the County shall continue planning and implementing programs.....for an improved public transportation system and for an expanded Transportation System Management (TSM) program. Shall achieve the best possible traffic movement for Coors: Traffic operations improve – computerized signalization system. Ridesharing. Incentives to use high occupancy vehicles(HOV) such as buses, car and vanpools. Design of roadway to accommodate HOV. Transit rate and transit schedule changes. Transit improvements. Pedestrian provisions. Commuter – oriented bicycle, motorcycle and moped programs. Parking management programs. See ABC-Z Policy 6.2.7.3

CCP rationale: not included in matrix: These programs will support community goals of conserving energy and improving air quality. TSM improves transportation... while requiring little capital investment, being cost effective...resulting in a more effective use of roadway.

ABC-Z Transportation Policy 6.2.7.3: Explore and invest in strategies to add capacity through additional transit service, dedicated lanes, and/ or peak hour directional lane changes. [A] ((60) move footnote to #6.2.7.3: ABC comp plan[132], CCP [236])

Environmental Concerns:

12) Matrix (237) (pg. 33) and CCP (pg.52): The Rio Grande Bosque and surrounding river lands are desirable and appropriate for recreation, scientific and educational purposes. Development in the Coors Corridor area shall be carefully designed to provide access to these lands while still preserving the natural wildlife habitat and maintaining essential flood control and drainage functions. Because public access to river lands is desirable and feasible with careful design, City and county should seek acquisition. Dedication, and lease or easement agreements for private lands in the Bosque as a part of the Rio Gr. Valley St. Park. See (Parks and O.S: 10.3.3.2, 10.3.5,10.3.5.3) & (Heritage conservation; 11.3.3, 11.3.3.1)

Parks and Open Space Policy 10.3.3: Use: Provide low-impact recreational and educational opportunities consistent with the carrying capacity of the Open Space resource. [ABC] ((29)- ABC (2), (4), WSSP(1241))

10.3.3.2: Develop standards to minimize impacts and environmental damage on areas suited for public access. ((31) - ABC (3), CCP SDP (237), WSSP (1241))

10.3.5.3: Acquire adjacent lands suitable for recreation uses that provide links to the river and Bosque through dedication, easements, leases, or fee simple purchases. [ABC] ((35) – CCP (237), Los Duranes SDP (457))

Heritage conservation:

Policy 11.3.3: Bosque: Regulate development on adjacent lands to preserve and enhance the Bosque as an important cultural landscape that contribute to the

history and distinct identity of the region, as well as nearby neighborhoods and sub-areas. [ABC] (37) – ABC Comp (3), Barelás (202), CCP(237,255,257) Los Duranes (457), North Valley Area plan(629,643), WSSP (1072,1076,1135,1234,1240))

Action: Policy 11.3.3.1: Acquire, encourage dedication, and secure easements or leases to ensure public access on private lands adjacent to the Bosque as a part of the Rio Grande Valley State Park. ((41) ABC Plan (3) Barelás (202), CCP (237), Los Duranes (457), North Valley Area plan (629), WSSP (1234, 1240))

13) Matrix (238) Extension ... of public sewer and water services in the Coors Corridor area shall be based on the capability to provide adequate service and to encourage development in accordance with approved plans and policies. Assessment or means to share extension and service costs shall be based on a fair and equitable procedure. (See Infrastructure , CF&S)

14) Matrix (239) The City and County shall work with the utility companies to encourage and support recommendations to place existing power distributions lines and existing telephone lines underground, as they need to be replaced. New power lines and telephone lines shall be installed underground in accordance with existing regulations. (See Urban design -7.6.3.1, Infrastructure 12.1.1)

Urban Design 7.6.3.1: Prioritize projects to relocate overhead utilities underground in visually sensitive areas and view corridors. [ABC] ((63) CCP (239), Rio Grande Corridor plan (721))

Comment: OK

15) Matrix (240) and CCP (pg.52) Policy 2: Disturbance or removal of existing natural vegetation from the Bosque shall be minimized. (See Parks and O.S. policy 10.3.5.a & Heritage conservation 11.3.3.a))

ABC-Z Parks and Open Space:

Policy 10.3.5: Bosque and Rio Grande: Carefully design access to the Rio Grande, the Bosque, and surrounding river lands to provide entry to those portions suitable for recreational, scientific, and educational purposes, while controlling access in other more sensitive areas to preserve the natural wildlife habitat and

maintain essential watershed management and drainage functions. [ABC] ((33) Comp plan (3), Barelás SDP (202), CCP (237), WSSP (1076))

10.3.5. (a) Minimize disturbance or removal of existing natural vegetation from the Bosque. ((34) CCP (240))

Comment: Use existing language in original policy: Disturbance or removal of existing natural vegetation from the Bosque shall be minimized.

16) Matrix (241) and CCP Policy 3 (pg. 53): Oxbow Marsh and bluff ... shall be protected and preserved through designation of this area as a wildlife refuge with limited access for scientific and educational purposes. A minimum 100 foot wide set back along bluff shall be obtained Alternative outfalls for development runoff shall be developed to prohibit flows directly into the Oxbow area.

Rationale: The Oxbow is a 37 acre wetland the only marshland in the urban area. It is a unique feature of the bosque ... whose fragile environment must be protected. **Staff comment: Accomplished. Out fall too specific to add to ABC-Z draft. Coordinate with O.S. to confirm or update MPOS.**

Comment: Is the Oxbow mentioned in the ABC-Z Plan to indicate its significance as a 37 - acre wetland and a wildlife refuge, that will always need to be protected in the future with careful planning?

17) Matrix (243) & CCP Policy 5 (pg.55): Prime agricultural farmland which lies between Corrales Main Canal and the Corrales Drain shall be preserved. Cluster development on nonagricultural land shall be encouraged and prime agricultural land shall be utilized as open space area. **See: land use:5.3.4.c, .5.4.h**

CCP Rationale (Not in Matrix) reads: Albuquerque/ Bernalillo County Comp Plan, recommends protection of high quality, agricultural lands so they are not used for residential, commercial, or industrial sites at the expense of the farm potential of those lands.

Comment: The CCP Rationale brings up the significance of preserving agricultural land for future farmland potential, thanks to the Albuquerque, Bernalillo Comp Plan, language. This rationale should not be eliminated. It should be included in the ABC-Z Plan.

Land Use: 5.3.4: Conservation Development; Encourage conservation development to promote private open space and preserve natural landscape and other features of the natural environment to encourage development that is sensitive to the open, natural character of the area and the geological and cultural conditions. [ABC] ((67) CCP (282), High Desert (353), La Cueva (395), Los Duranes (464), North I-25 (607), North Valley (657), Sawmill/ Wells park (744), Uptown (848), Volcanos Cliffs(930, 931,932) Vol. Trails(1015) WSSP (1229, 1238, 1243))

Policy 5.3.4.c: Use cluster development to concentrate buildings on a portion of the site, in particular near floodplains or other natural features, to allow the remaining land to be used for recreation, open space, or preservation of sensitive land areas. [A] ((70) CCP (242,243), North Valley (612), Uptown (857), Volcano cliffs (930, 931, 932)

Comment: The ABC-Z Policies are more general and not specific to any particular area. Whereas, the CCP policy is more specific to the farmland & floodplains between Coors and the River. The CCP provides stronger language for the protection for our farmland because it mentions them specifically. We need stronger language to preserve our remaining farmland

18) Matrix (245) & CCP Policy, (pg.57): Changes to natural topography shall be kept to a minimum. In general, grading shall be minimized. If grading is necessary, contour grading shall be encouraged to preserve natural features and vegetation. On slopes of ten percent or greater, no grading shall take place until a specific development plan has been approved for construction. The development plan shall retain the sense of the natural features and vegetation. Reconstruction and revegetation to a natural setting shall be encouraged. See **Urban Design:7.3.1, Heritage Conservation: 11.3.1.b, 11.3.1.f, 11.3.3.a, 11.3.3.b**

Comment: The CCP policy is very important to us, and should not be eliminated.

Urban Design: 7.3.1 Natural and Cultural Features: Preserve, enhance, and leverage natural features, and views of the cultural landscapes. [ABC] ((17) ABC Comp, (34), Los Duranes (469), NWMEP (699), SW Area Plan (806,) Uptown (859), Vol. Trails (1015, 1016))

Comment: This comment is too general, to preserve the topography of the landscape and protects against cut and fill practices, which turn out to be very ugly developments.

Heritage Conservation: 11.3.1.b:

Policy 11.3.1: Natural and Cultural Features: Preserve and enhance the natural and cultural characteristics and features that contribute to the distinct identity of communities, neighborhoods, and sub-zones. [ABC] (27) Comp Plan (17, 100), Barelás (185), North -25 (573), NWMEP (690), Vol. Cliffs (901,913,914,915, 931,932), Vol. Hts. (1003), Vol. Trails (1015), WSSP (1032, 1123))

Policy 11.3.1.b: In areas with scenic vistas, site buildings to minimize alteration of existing vegetation and topography. ((29) Comp plan (28,99), CCP (245), 258))

Comment: Good

Policy 11.3.1.f: Encourage reconstruction and revegetation to a natural setting. (33) (CCP (245))

Policy 11.3.3: Regulate development on adjacent lands to preserve the Bosque and important cultural landscape that contribute to the history and distinct identity of the region, as well as nearby neighborhoods and sub-areas. [ABC] (37)ABC Comp 3), Barelás (202), CCP (237,255,257), Los Duranes (457), North Valley (629,643, WSSP) (1072,1076,1135,1234,1240)

Policy 11.3.3.a: Minimize grading, changes to natural topography, and land disturbance to preserve natural features. ((38) ABC Comp plan, 28), CCP (240 ,245))

Policy 11.3.3.b: Encourage reconstruction and revegetation to a natural setting on lands adjacent to the Bosque. (39) CCP (245) OK

Comment: When development follows the slopes of the hillside, it looks a lot better and everyone has a view. When hillsides are cut out and made flat, the developments look ugly, have high retainer walls and no one can enjoy the views. This is a practice we do not like. Need stronger language. Development should follow the topography of the land.

This is far as I could get in reviewing the Coors Corridor Plan with the policies from the ABC-Z Plan. There are more important policies in the Coors Plan. More time was needed to compare to the ABC to Z Plan policies.

Northwest Mesa Escarpment Plan / Matrix/ ABC-Z Draft Comparisons:

Comments are in Blue

Rene' Horvath -TRNA August 2, 2016

1) Matrix (678) pg.82, & 83- **Current 1989 NWMEP states: The following 9 Governing Concepts for Development and Conservation are Established:**

- a) The unique environment, visual, recreational, archaeological, and historical qualities and opportunities of the Escarpment are to be conserved.
- b) The escarpment area is recognized as a fragile and valuable environmental resource which harbors plant and wildlife within a unique geological formation. Disturbances to the natural environment, in particular to the drainage, basaltic caprock, slopes and vegetation could result in erosion and caving of slopes and boulders and pose a threat to the public safety and welfare by impacting existing and future downstream and down slope development.
- c) The escarpment is to be conserved as an entire unit with a recognizable relationship to the volcanoes which created it, the mesa top which borders it, and the arroyos which bisect it.
- d) The black escarpment face is recognizable as giving physical order to the community and as acting a visual reference point. Views to it and from it are recognized as important.
- e) The archaeological/historical resources are recognized as inexorably linked to their setting. The resources and the setting must always be considered in relationship to each other as well as to other influences.
- f) The natural setting and archaeological/historical resources of the escarpment combine to provide recreation and educational opportunities which are to be developed in ways which will not damage either the setting or the resource. Management and maintenance are recognized as intrinsic needs.
- g) The escarpment is not an isolated portion of the community. It is recognized as physically, culturally and economically integral to the rest of the community and as providing physical, cultural, and economic benefit to the community.
- h) Conservation of the escarpment rock art, and related archaeological sites allows for further research and discoveries of the people who inhabited the Mid Rio Grande Valley. The art is not only an artistic expression of prehistoric peoples, but a record of their culture of their culture and history. The physical and historical connection from the mesa to the valley through an open space network will create significant educational, research and recreational opportunities.
- i) The escarpment's archaeological/ historical resources are recognized as important to the world as well as the local community. The benefits of having the resources in our community carries with it a corresponding responsibility to the larger world community.

See ABC-Z policies - Parks and Open Space policies: 10.3.6.a, & 10.3.6.b

Heritage Conservation: 11.3.4, 11.3.4.c, 11.3.4.d, 11.3.4.f, 11.3.4.2, 11.4.1, 11.4.5.b

The following ABC-Z policies will keep, replace, or eliminate the above current NWMEP policies:

Parks & O.S. 10.3.6: Petroglyph National Monument: Preserve the volcanoes, key portions of the basalt flow, and the Northwest mesa Escarpment as part of the open

Space network. [ABC] ((36) - Comp Plan [5]) OK

10.3.6.a: Identify and conserve the unique environmental, visual, recreational, archaeological, and historical qualities and opportunities of the Northwest mesa Escarpment. (37 - NWMEP (678, 679, 697) WSSP (1148)) A

Comment: OK

10.3.6.b: Conserve the Escarpment as an entire unit with a recognizable relationship to the volcanoes that created it, the mesa top which borders it, and the arroyos that bisect it. ((38) - NWMEP 678,679,697)

Comment: OK

Heritage Conservation (main heading): 11.3.4: Petroglyph National Monument Regulate adjacent development to protect and preserve the Petroglyph National Monument- its volcanoes, petroglyphs, and North west Escarpment – as a priceless cultural landscape and community resource that provides physical, cultural, and economic benefits. ((42) - NWMEP (678, 679, 693, 694), WSSP (91145))

11.3.4.c: Conserve and protect the Monument and surrounding lands through regulations associated with the escarpment face, conservation area, impact area, and view area. ((45) - NWMEP (678, 679, 690, 697)) ?

Comment: What regulations?

11.3.4.d: Minimize negative impacts, including fugitive dust; storm water runoff; and damage to vegetation, slopes, or boulders. ((46) - NWMEP (679,681) Vol. Cliffs SDP (927) Vol. Heights SDP (971) WSSP (1077,1148, 1241))

Comment: Change Minimize to “Mitigate”. Also add policy b in NWMEP to explain why the need for this policy.

11.3.4.f: Protect views to and from the black Escarpment face, which gives physical order to the community and acts as a visual reference point. ((48) - CCP (257), NWMEP (678, 679, 682, 683, 692,693))

Comment: OK

11.3.4.2: Work with the National Park Service to provide educational, research, and recreational opportunities that leverage the physical and historical connection from the mesa to the valley through an open space network. [A] ((53) - NWMEP (679)) ?

11.4.1: Archaeological Setting: Consider archaeological and historical resources in relationship to their setting and to each other in terms of determining their significance, appropriate treatment and preservation, appropriate management, and appropriate access and educational opportunities. [A] ((73) - NWMEP (679))

Comment: OK

11.4.5 (Heading): Private protections: Encourage the private protection of sensitive lands, such as rock outcrops or significant cultural, archaeological, volcanic, or geologic land through private conservation easements, or replatting as private open space. [A] ((84) -Vol. Hts. (965))

Comment: May want to trench rather than dynamite the mesa top to put in utilities, to avoid damage to the bedrock and man- made structures.

11.4.5.b: Prioritize the conservation of rock art on the Northwest Mesa Escarpment and related archaeological sites to allow further research and discoveries of the people who inhabited the Middle Rio Grande Valley. ((86) - NWMEP (679))

2) Matrix (680) pg.83 and 1989 NWMEP: archaeological sites shall be identified and protected or mitigated, as appropriate.
See ABC-Z policies 11.3.4.a, 11.4.1.1, 11.4.5.a

11.3.4.a: Protect the archaeological and historical resources of the Monument. ((43) - NWMEP (680))

Comment: OK

11.4.1.1: Allocate adequate funds for management and maintenance to protect these resources in perpetuity and meet our stewardship responsibilities. [A] ((74) NWMEP (680))

Comment: OK

11.4.5.a: Protect archaeological resources and rock outcroppings on the Northwest mesa through in-place avoidance, if possible, and next through mitigation, which tends to have a much higher cost. ((85) - NWMEP (680), Vol. Hts. SDP (965))

Comment: Put a period at the end of North west mesa. Leave off the rest of the sentence.

3) Matrix (681) pg.83 & current 1989 NWMEP: Any damage to the vegetation,

slope, or placement of boulders due to or related to construction shall be mitigated.
See ABC-Z policy 11.3.4.d- Heritage Conservation:

11.3.4.d: Minimize negative impacts, including fugitive dust; storm water runoff; and damage to vegetation, slopes, or boulders. ((46) - NWMEP (679,681) Vol. Cliffs SDP (927) Vol. Heights SDP (971) WSSP (1077,1148, 1241))

Comment: Cross out Minimize and replace with mitigate to Open Space areas". Also include "trench the volcanic rock, rather than dynamite to avoid damage to the mesa and building structures."

4) Matrix (682) pg. 83 & current 1989 NWMEP: Structures shall not block views of the escarpment or visually contrast with the natural environment.

See ABC-Z policies- Heritage Conservation: 11.3.1.d, 11.3.1.1, 11.3.1.2, 11.3.4.e, 11.3.4.f

11.3.1.d: Protect important views from public ROW along key corridors and from strategic public locations thru regulations on building height limits, site layout, and street orientation. ((31) - CCP (234 ,257, 270, 271) North I-25 SDP (577), NWMEP (682, 692) SW Area Plan (806) Uptown SDP 851,859), Vol. cliffs SDP (902,903) Vol. Hts. SDP (935, 936, 1003) Vol. Trails SDP (1016), WSSP (1073,1092))

Comment: We do not know what the building heights will be in their revisions. Currently the building Hts. are limited to 19 ft. in the NWMEP Street orientation means view corridors.

11.3.1.1: Actions: Adopt site development standards and/ or view protection overlays for building and wall height, massing frontage, color, and tree preservation as needed to identify and protect significant views from the public ROW along key corridors and from strategic public sites. [ABC] ((34) - CCP (270) NWMEP (683, 692), SW Area Plan (806) Uptown SDP 851) Vol. Hts. SDP (1003) Vol. Trails SDP (1016) WSSP (1092, 1226,1244)

Comment: This relies on overlays to get done. When will they be done?

11.3.1.2: Adopt design guidelines with color and reflectivity restrictions to minimize the visual impact of development on the West Mesa. [A] ((35) NWMEP(682), Vol. Trails SDP (1016)

11.3.4.e: Minimize visual impact of adjacent development through design standards related to color, building materials, and screening. ((47) NWMEP(682,684),WSSP (1077,1148,1241))

Comment: Should include also include reflectivity.

11.3.4.f: Protect views to and from the black Escarpment face, which gives physical order to the community and acts as a visual reference point. ((48) CCP (257), NWMEP (678, 679, 682, 683, 692,693))

Comment: OK

5) Matrix (683) pg. 83, and 1989 NWMEP: Sites which cannot be set aside as open space, including recreational facilities, and sites adjacent to open space, shall have minimal visual impact.

See 11.3.4.e, 11.3.4.f - Heritage conservation.

11.3.4.e: Minimize visual impact of adjacent development through design standards related to color, building materials, and screening. ((47) NWMEP(682,684), WSSP (1077,1148,1241))

Comment: Should also include reflectivity.

11.3.4.f: Protect views to and from the black Escarpment face, which gives physical order to the community and acts as a visual reference point. ((48) CCP (257), NWMEP (678, 679, 682, 683, 692,693))

Comment: OK

6) Matrix (684) pg.84, and 1989 NWMEP: No structures shall be placed 50 ft. of the top or the base of the escarpment face. **(leave mid portion out and keep following:)** Any construction within the conservation area must be certified geotechnically sound by the city engineer, so as not to cause a threat to public safety. (see regulations 22-8 pg.84 for possible exceptions.) (Handled through regulation)

7) Matrix (685) pg. 84 and 1989 NWMEP: Public access and public facilities shall be compatible with the sensitive nature of the escarpment. ... **(Leave rest out)**
See Urban design - 7.6.3, Parks and Open Space - 10.3.6.c, 10.3.6.e, Infrastructure CF & S.

Urban Design (Heading) 7.6.3: Utility infrastructure: Encourage design of visible infrastructure (surface and overhead) that respects the character of neighborhoods and communities and protects significant natural and cultural features. [ABC] ((60) ABC Comp Plan (97), North I-25 SDP (588) Volcano Hts. SDP (937)

Comment: Some may need to be placed underground.

Parks and Open Space - 10.3.6.c: Design public access and public facilities to be compatible with the sensitive nature of the Escarpment. [A] ((39)- NWMEP (685), WSSP (1148, 1241))

10.3.6.e: Limit utilities and roads to areas that are least sensitive to disturbance,

avoiding Piedras Marcadas Canyon, the point where the mid branch of the San Antonio crosses the Escarpment, the Marsh peninsula, Rinconada Canyon, and the south of Rinconada Canyon. [A] ((41) - NWMEP (685))

Comment: This needs to be reworded to make more clear.

8) Matrix (686) pg. 84, and 1989 NWMEP: Unser Blvd. shall be designed...
Accomplished.

9) Matrix (687) pg. 84, and 1989 NWMEP: Design regulations for Paseo del Norte... **Accomplished.**

10) Matrix (688) pg. 84, and 1989 NWMEP: ...bike trail on top of mesa be deleted. ... trail planning will be conducted. **Accomplished**

11) Matrix (689) pg.84, and NWMEP: Drainage facilities design shall be sensitive to the character of the existing escarpment. Arroyo corridor and drainage management plans are the appropriate planning level for specific channel treatment recommendations for arroyos identified in the “Facility Plan for Arroyos.”
See Infrastructure CF& S

Comment: What does the “Facility Plan for Arroyos” say? What does it say in regards to arroyo treatment? Need language to preserve arroyos in more of its natural state. Concrete work needs to blend with the soil color.

12) Matrix (690) pg.84 and NWMEP: Four Areas, including Escarpment and surrounding lands, are established for different degrees of conservation as shown on maps 10, and 2: the escarpment face, conservation area, impact area, and view area. See 11.3.1, 11.3.4.c Heritage Conservation.

11.3.1: Natural and Cultural Features: Preserve and enhance the natural and cultural characteristics and features that contribute to the identity of communities, neighborhoods, and sub-areas. [ABC] ((27) ABC Comp plan, (17, 100), Barelás (185,) North I-25 (573). NWMEP (690), Vol. Cliffs (90), 913, 914,931, 932) Vol .Hts.

Comment: Good.

11.3.4.c: Conserve and protect the Monument and surrounding lands through regulations associated with the escarpment face, conservation area, impact area, view area. ((45)NWMEP (678,679,690,697)

Comment: Good

This is far as I got with the North West Mesa Escarpment Plan. More time was

needed to review the other Matrix Policies and compare them to the ABC-Z plan.

Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Tuesday, August 02, 2016 8:52 AM
To: Lehner, Catalina L.
Cc: Barkhurst, Kathryn Carrie; Renz-Whitmore, Mikaela J.; Toffaleti, Carol G.
Subject: FW: Official EPC Comments on the ABC Comp Plan"

For the record...

Thanks,
Terra

-----Original Message-----

From: Gary W. Kelly - gMail [<mailto:gary.wynn.kelly@gmail.com>]
Sent: Monday, August 01, 2016 3:43 PM
To: Planning Comp Plan-UDO
Subject: Official EPC Comments on the ABC Comp Plan"

Dear Chair Karen Hudson;

The Comprehensive Plan is an admirable document in terms of the effort and detail contained in the plan. It does well at covering hundreds of topics in considerable detail. It is not surprising that points are absent that should be considered.

* It is exciting to anticipate that in the future, more attention is to be paid to a walking community--improved pedestrian routes and crossings. What is missing is a plan to ensure that sidewalks remain usable. Current policy fails to keep mailboxes from overhanging sidewalk areas--particularly a barrier for persons having a disability, or elderly persons who may have more difficulty walking and managing to avoid obstructions. Current policies are inadequate at keeping vegetation from sidewalk areas. The COA depends on citizens to report obstructions and takes no action unless a specific address is given. When it is, a letter is written, but there is no requirement for compliance at keeping sidewalks clear of overgrowth. The Comprehensive Plan should address this in terms of a policy to develop new requirements and practices to ensure that walking sidewalks and trails remain clear of obstructions, and provide an on-going method for maintaining such areas.

* Albuquerque differs from most other cities in the US in that once permission has been given to a utility such as Comcast to do work, Comcast or any other utility can disrupt pedestrian access by tearing up sidewalks without any provision for safe pedestrian passage while the construction persists. Most cities have a policy requiring that the utility provide safe pedestrian/cycling access while the construction progresses. This should be addressed if a walking/cycling option is to be a usable one.

The Comp Plan provides for future automation alternatives, and encourages developments such as Rapid Ride services. There appears to be no mechanism to study the consequences of such options. The consequences are assumed to be known and desirable. That may be a poor assumption. Example: Automation will redefine what prime real estate means, assuming that it will have any meaning at all. When

people are only concerned with points of departure and a final destination, they will value transit time over other experiences, as automation permits preoccupation with digital media, and reduces interactions with the environment. What is along the route or nearby may have no value. The appeal of destinations will be in terms of time factors rather than appearance factors. The reduced interactions may well impact the ability of the COA and County to obtain voter approval for public projects other than transit projects. Historical landmarks, public facilities, and maintenance of infrastructure may well become out of sight, and out of mind. The Comp Plan should suggest ways to research and understand the impact of such advances before adoption rather than attempt to respond to an unfortunate implementation after the fact. Interaction versus transaction factors need to be understood in terms of community development, growth, law enforcement, recreation, and quality of life. It is essential to balance community interaction factors against transaction factors such as commercial development and transportation if the COA and County are to remain viable environments where people wish to live, work and to which they will want to contribute.

Thank you,
Gary W. Kelly,
Human Factors Engineer

Reed, Terra L.

From: Scot Key <jscotkey@gmail.com>
Sent: Sunday, July 31, 2016 6:32 PM
To: Planning Comp Plan-UDO
Subject: Official EPC Comments on the ABC Comp Plan

Chair Karen Hudson:

I preface my scant remarks having read those submitted prior to July 22, 2016, and having read the Plan draft, particularly Chapters 6 and 7. While my personal passion in making Albuquerque and Bernalillo County the absolute best it can be, particularly from a pedestrian and cycling perspective, is strong, my comments will be brief, and on a relatively simple level, for principally the following reasons:

- I'm not a professional planner, traffic engineer, landscape architect or any of the other areas of expertise encompassed in the draft Plan;
- I must admit the complexity and density in both the draft Plan and published comments are a tad intimidating; and,
- That said, I have a very strong confidence that those who are crafting, commenting and implementing this Plan can take my simple comments and incorporate them into reality to a degree that would take me approximately 1,000,000 hours to study and understand on my own.

In other words, I like what I'm reading in this most recent draft, particularly in the areas of pedestrian/cycling access and safety, and advocate that the admittedly vague, yet very encouraging, general policies stated here lead to on-the-ground changes now and into the future when it comes to pedestrians and cyclists.

Just as important, I very much like the emphasis on neighborhoods in this document, walkable neighborhoods. Somewhere in the pre-July 22 comments former Albuquerque mayor David Rusk mentions that Metro Portland has a two-sentence planning mission statement. The second sentence is: Every kid can walk to a library.

Now *that's* a statement I can understand and regarding which I completely agree. While we're at it, let's add in a grocery, a park, and maybe a place to get a cup of coffee, all within walking distance, for everybody. We can quibble about what the absolute essentials of a great neighborhood are, but being able to safely and comfortably walk to those chosen establishments is paramount.

Hence, my only comment here is that I strongly favor what I'm reading in the document, appreciate the complexity in its creation and review process, and urge that the Plan's pedestrian/cycling and neighborhood recommendations be crafted in the best way possible to foster their successful implementation. As analogy, while "Complete Streets" is merely a small component of this Plan, it is perhaps helpful to look closely as how the language of the City's "Complete Streets Ordinance" was crafted, and how its specific language has helped and, in some cases, hindered, a bit, implementation of multi-modal strategies and requirements.

We're all learning here, even those with far more expertise than me in all the areas encompassed by this plan. Complete Streets is another important stepping stone in that community learning process.

Sincerely,

Scot Key
Member, Greater Albuquerque Bicycle Advisory Committee
2329 Lakeview Rd. S.W.
87105

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Scot Key
Abq, NM USA, Earth
jscotkey@gmail.com

Reed, Terra L.

From: Robert R McCabe <bob.mccabe@me.com>
Sent: Monday, August 01, 2016 6:22 PM
To: Planning Comp Plan-UDO
Cc: Renz-Whitmore, Mikaela J.
Subject: Official EPC Comments on the ABC Comp Plan

Robert R. McCabe AIA
bob.mccabe@me.com

August 1, 2016

Ms. Karen Hudson, Chair
Environmental Planning Commission
Albuquerque, New Mexico

RE: The ABC Comp Plan

Dear Ms. Hudson and members of the Environmental Planning Commission

I would like to add my support for your approval of the proposed ABC Comp Plan.

I would like to congratulate the Mayor and the City of Albuquerque for undertaking this comprehensive and creative update of Albuquerque and Bernalillo County's Comprehensive Plan and development process. I am particularly pleased that the Centers and Corridors concept remains as the organizing element for Albuquerque and Bernalillo County's growth and development future. As many of you know this idea has been a passion of mine for many years beginning in the 1980's and culminating in the 2001 with the inclusion of Centers and Corridors in the update of the Comprehensive Plan during my term as Planning Director. The ABC Comp Plan before you does a great job in supporting the original concept while at the same time improving and refining it by tailoring categories to better reflect how development has occurred over the intervening years. The new plan will reinforce the benefits of the Open Space network and support sustainable development patterns over time. The refinement of the Corridor types (Premium Transit and Main Street) provide new goals for coordinating land use and transportation to create great places and more transportation choices. The Plan does an exceptional job of integrating the Centers & Corridors concept into all parts of the plan and knits together ideas that will help guide implementation in the future.

In my opinion the ABC Comp Plan will be an exceptional tool to help Albuquerque and Bernalillo County realize its incredible potential through thoughtful, coordinated and sustainable development. I urge your support!

Sincerely yours,

Robert R. McCabe AIA
Planning Director 1998-2001
Member Environmental Planning Commission 1991-1993

Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Tuesday, August 02, 2016 1:01 PM
To: Lehner, Catalina L.
Cc: Renz-Whitmore, Mikaela J.; Barkhurst, Kathryn Carrie; Toffaleti, Carol G.
Subject: FW: Official EPC Comments on the ABC Comp Plan
Attachments: Comments about the ABCtoZ Comp Plan_submit.docx

More comments...

Thanks,
Terra

From: robert messenger [<mailto:robertmess@hotmail.com>]
Sent: Tuesday, August 02, 2016 11:48 AM
To: Planning Comp Plan-UDO
Subject: Official EPC Comments on the ABC Comp Plan

Dear Chair Karen Hudson,

Attached are my comments on the ABCtoZ Comprehensive Plan.

The City of Albuquerque and Bernalillo County planning department, consultants, and volunteers have done an excellent job in rewriting the Comprehensive Plan and making it consistent with the Integrated Development Ordinance, which is also being revised.

Thank you for considering my comments.

Robert C. Messenger
Unemployed Planner
Graduate of UNM MCRP 2003

Comments about the ABCtoZ Comp Plan

July 6th, 2016

Overall, the plan presents a hopeful, economically- and environmentally-sustainable vision for the future of land use, transportation, and other community resources valued by people in Albuquerque and Bernalillo County. I believe that the following elements, some new and some re-designed are beneficial to the majority of the residents in the metro area*:

1. An increased emphasis on gardening – especially community gardens, small-scale/local/organic farms, and the importance of maintaining an agricultural way of life. I especially like Chapter 13's discussion of remediation and policy 13.5.1 to address it.
2. Zoning codes to prevent the spread of more thrift/payday lending stores, especially in commercial strips where they are already established, and often in low-income areas.
Question: Does the plan or zoning code address "rent to own" businesses?
3. A re-thinking of engaging in Community Planning areas versus working with Neighborhood Associations. I believe that many residents are not represented by Neighborhood Associations and many renters are poorly represented by associations oriented towards home owners. For example, the residents in the mostly low-income neighborhoods surrounding Menaul (from Carlisle to San Mateo) have not had much neighborhood representation for at least 20 years (since I moved to Albuquerque). This is an investment in democracy but I think that some folks in the neighborhood associations will be unhappy as they will either lose power or have to share power.
4. I like the Citizens Planning Academy as a way to create and maintain long-term community involvement in the planning process. I would like to see more details about how the City Planning Department could work with UNM students and other volunteers to develop this program.

* Not everyone will benefit from these provisions. Owners and employees of payday/thrift lending institutions may lose new business opportunities with tighter zoning restrictions.

Comments about Areas of Change

Many of the commercial developments in the Areas of Change are run-down, auto-oriented, ugly strip malls and fast-food restaurants.

I look forward to seeing many of the blighted strip malls demolished and re-purposed into mixed land uses of housing and retail. Also, I look forward to them having businesses that do not take advantage of poor persons: currently, many of these strip malls feature thrift lenders, rent-to-own businesses, and other marginal businesses that prey on the poor and desperate. These places often lack pedestrian and bike-friendly design features, have distracting and ugly signage/storefronts, and include excessive parking spaces and driveway access points. Their

lack of human-scaled design and proximity to high-speed roadways discourages any form of community gathering.

In Albuquerque we celebrate our parades and street fairs in more historic, life-affirming commercial districts such as Baretas, Nob Hill, Downtown, or Old Town. In the future, blighted strip malls have the potential to also become places that benefit their neighborhoods and serve as a source of pride for residents by creating a genuine sense of place.

I had the experience of working in one of these unattractive strip malls near Menaul and San Mateo. The owner of the strip mall was slow to replace lighting under the awnings and the sign fixture, and charged an exorbitant amount of \$300.00 (my opinion) for monthly parking lot maintenance/cleaning. This owner had no problems leasing to thrift lenders and marginal, possibly criminal drug dealers/money launderers. The practices of slum lords like this commercial developer should be taken into consideration in any future land use decisions.

As dysfunctional and unattractive as these places may be, they are home to many legitimate and not so legitimate businesses. For redevelopment to occur there will be many challenges. These include:

1. Have any market studies been done to determine which strip malls and properties are best candidates for redevelopment? Who pays for such studies?
2. What should they become – mixed use housing and retail or housing only?
3. Who determines the feasibility of such redevelopment?
4. Which owners are most willing to have their properties redeveloped, demolished, or sold? Which tenants are most willing to be displaced?
5. Are the property owners' desires for their properties in sync with recommended market studies, above?
6. Who would broker deals among the City and developers and owners?
7. How would the retail and service needs of area residents be accounted for in any market analyses?
8. It might be more costly for small, locally-owned businesses to be displaced during any reconstruction or demolition of the buildings they currently lease. How can they be compensated for any lost revenue?
9. Is it fair to separate legitimate from questionable businesses? Who determines which is which?

Regarding this last item, I believe that one way to measure the utility of a business or service is whether or not that business contributes to the economic vitality of the area's residents and that of surrounding businesses. Businesses that charge very high interest rates and use deceptive advertising practices are not legitimate in that they decrease the economic vitality of neighborhood residents and take potential sales away from legitimate businesses. Businesses that pretend to be selling items when they are in fact selling drugs or acting as fronts for other illegal activities (gambling or money laundering) are also not legitimate. One of the challenges will be identifying businesses that are questionable, such as:

- Payday/thrift lenders;

- Businesses that only offer “rent to own” options;
- Auto dealers that are de facto thrift lenders, because their sales prices and financing terms are based on your credit score; and
- Businesses that are merely fronts for drug-dealing, money laundering or other illegal activities.

I think that these businesses should be excluded from any planning studies or market analyses, because they should not be allowed in any future developments. However, I am not sure how these businesses could be excluded without violating the Takings clause or other property or zoning laws.

Reed, Terra L.

From: Catherine Mexal <cmexal@gmail.com>
Sent: Monday, August 01, 2016 5:28 PM
To: Planning Comp Plan-UDO
Subject: Official EPC Comments on the ABC Comp Plan

Chair Karen Hudson,

Now that it's finally raining, I've realized another issue. My neighbor's 1-year old house occupies most of his lot so his roof runoff floods onto my property. This is supposed to be illegal but my only recourse is to sue but this is background for my comment.

Runoff consequences and prevention must be well defined (and subsequently enforced). Section 5.3.6.a states:

> Impermeable surfaces should not cover more than 50% of the lot.

This is absolutely not enforced presently so how will it be in the future? It must be specified rigorously. Improperly handled roof, driveway and other impermeable surface runoff goes into streets and alleys then to gutters and on to the river but does nothing to recharge our water table. This is a critical issue for the future of NM.

My second issue related to this section is yet another instance of my July 20 comments. Section 5.3.6.a refers to "Policy 5e below". That section is actually 5.3.6.e! I've found too many errors and mis-references in the limited sections I've read of the 400+ page document for it to be considered ready for public review.

Thank you, Chair Hudson, for your time.

Catherine
Wells Park

Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Tuesday, August 02, 2016 1:05 PM
To: Lehner, Catalina L.
Cc: Renz-Whitmore, Mikaela J.; Barkhurst, Kathryn Carrie; Toffaleti, Carol G.
Subject: FW: Official EPC Comments ABC Comprehensive Plan (Reply to Staff Responses)
Attachments: ABC-Z ~ Followup EPC Memo (DA-AA 8-2-2016).pdf; ABC-Z ~ Followup EPC Memo ~ (EC-UNM 8-2-2016).pdf

For the record.

Thanks,
Terra

From: Kim Murphy [<mailto:kmurphy@unm.edu>]
Sent: Tuesday, August 02, 2016 12:05 PM
To: Planning Comp Plan-UDO; Renz-Whitmore, Mikaela J.; Webb, Andrew
Subject: Official EPC Comments ABC Comprehensive Plan (Reply to Staff Responses)

Please find attached the following in reply to Staff Responses to Comments dated July 28, 2016:

1. Memo on behalf of Albuquerque Academy re Area of Change Designation
2. Memo on behalf of University of New Mexico re Employment Center Designation for UNM South Campus

Confirmation of receipt requested. Thank you.

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

Altura Real Estate, LLC

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

Memo

Date: August 2, 2016 11:55 am

To: Karen Hudson, Chair, Environmental Planning Commission
City of Albuquerque

From: Kim Murphy, ARE 

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

I'm writing in reply to the Staff Response to Comments, Item #70, and as a follow-up to my letter dated July 22, 2016 requesting that the Academy Property be designated as Area of Change, consistent with the January 2016 Draft Comprehensive Plan. This request is justified by the existence of a City-approved Site Development Plan for Subdivision or Master Development Plan dating from 1989 covering the entire Academy Property, comprising approximately 312 acres. One of the criteria for the Area of Change designation is: "Properties within approved Master Development Plans (site development plans with detailed design standards" (EPC Draft, Page 5-26).

As discussed in my July 22nd letter, the Academy Property, in its entirety, satisfies the criteria for Area of Change and should be so designated.

Staff Response, Item #70, states that a City-approved Site Plan for Subdivision "would not be considered a 'Master Development Plan' in the City's terminology. This is patently incorrect. As pointed out in my July 22nd letter, the City's zoning code defines "Master Development Plan" as "a plan meeting the requirements for a site development plan for subdivision" (Section 14-16-1-5). Further, the EPC determined in 1989 that the Academy Site Development Plan for Subdivision constituted a "Master Plan".

Albuquerque Academy reiterates its request that the EPC condition its approval of the Draft 2016 Comprehensive Plan by directing that the entire Academy Property covered by the 1989 Site Development Plan for Subdivision (Z-78-153-3) be designated "Area of Change" and that it be added to the list of City Master Plans in Table A-3, Appendix C.

Altura Real Estate, LLC

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

Please refer to my July 22nd letter re Albuquerque Academy Development Areas (City) for background.

Respectfully, Kim

Altura Real Estate, LLC

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

Memo

Date: August 2, 2016 11:55 am

To: Karen Hudson, Chair, Environmental Planning Commission
City of Albuquerque

From: Kim Murphy, ARE *KDM*

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

I'm writing in reply to the Staff Response to Comments, Items #71 & #72, and as a follow-up to my letter dated July 22, 2016 requesting that UNM South Campus-CNM Main Campus area be formally designated an Employment Center in the 2016 Comprehensive Plan Update ("CPU"). Staff response to comments dated July 28th do not reflect full consideration of this request in my opinion, and staff appear to be looking to the EPC for direction.

The EPC Draft CPU "Vision Map" at Figure 5-2 (page 5-10) shows the UNM South Campus area as an Employment Center. This is appropriate and consistent with current development and future plans of the University.

However, the "Centers and Corridors Map" at Figure 5-5 (page 5-15) shows only the CNM Main Campus area as "Employment Center". The UNM South Campus area is shown as "Activity Center", which is defined as neighborhood-scale commercial and residential. This is not appropriate and not reflective of current land use or future plans of the University.

With respect to the UNM South Campus area, the UNM Campus Master Plan (May 2011) calls for: 1) continued development of the Science & Technology Park, 2) enhancements of collegiate sports venues, 3) upgrading student housing and 4) providing new retail and mixed-use commercial, to balance employment, academic, research and sports visitor use. Each of these elements constitute significant economic development opportunities for Albuquerque, the region and the State.

One of the primary goals of the 2016 Comp Plan Update is to support and encourage economic development. The formal designation of the UNM South Campus-CNM

Altura Real Estate, LLC

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

Main Campus area as an "Employment Center" seems like an appropriate measure toward this important goal... one which would find little objection.

Staff concern that this is a "new center" (Response #71) is incorrect as the foregoing makes clear. The additional concern that this request is unnecessary and "of limited use" (Response #72) is also incorrect. While New Mexico courts have ruled that State-owned land is not subject to local zoning, land use controls and similar development restrictions, the University is governed by a wide variety of plans, policies and other regulations.

Response #72 by staff suggests that an Area of Change cannot occur outside a "Center" boundary. This is a very narrow interpretation of the Area of Change criteria (EPC Draft, Page 5-26 and Appendix L). My understanding, after hours of review of the CPU, is that Area of Change is a Development Area of the City where new growth is desired and encouraged (the other being Area of Consistency) and that Centers and Corridors are specific locations "incorporated into Areas of Change" (page 5-12) where higher-intensity, mixed-use development are connected by transit. Areas of Change is the broader planning concept, while Centers and Corridors is more specific.

In summary, if the purpose of the Comp Plan Update is to further economic development, why would the City not welcome the opportunity to formalize the UNM South Campus-CNM Main Campus as more expansive "Employment Center", allowing collaboration between two public entities with similar goals in creating new economic development opportunities? Would not the citizens we both serve appreciate joint efforts toward this end?

The University of New Mexico requests that the EPC condition its approval of the Draft 2016 Comprehensive Plan by directing that the area shown on Attachment 1, comprising approximately 500 acres, and described on Attachment 2 (both from my July 22nd letter and also enclosed herein) as an Employment Center and Area of Change.

Please refer to my July 22nd letter re UNM South Campus Employment Center for background.

Respectfully, Kim



Google Earth

miles
km



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:		
o Sports Fac.+ Parking	164 acres	33%
o Research Park	57 acres	11%
o Multi-family	36 acres	7%
o Education	89 acres	18%
o Hospitality	5 acres	1%
o Commercial	1 acres	
o Vacant	88 acres	17%
o AMAFCA	27 acres	5%
o Major ROW	39 acres	8%
Total	500 acres	100%
Land Ownership:		
o UNM	311 acres	62%
o CNM	82 acres	17%
o City	68 acres	14%
o AMAFCA	27 acres	5%
o Private	12 acres	2%
Total	500 acres	100%

Reed, Terra L.

From: Jim Wible <jimw@gotSPACEUSA.com>
Sent: Monday, August 01, 2016 11:26 AM
To: Planning Comp Plan-UDO
Cc: Renz-Whitmore, Mikaela J.; Keith Meyer
Subject: Official EPC Comments on the ABC Comp Plan

Chair Karen Hudson,

This draft comprehensive plan is built around a Vision in Chapter 3 that is built around a philosophy of Centers and Corridors. As the public works with this new plan, justifications will need to be developed for projects on how the project supports this vision just as justifications are now developed with the current comprehensive plan. Therefore the new projects will in some way need to be supportive of the Centers and Corridors overall Vision.

Chapter 14 touches briefly about the city's link with the Comprehensive Plan and the Capital Implementation/Improvement Program processes. Strategic Action 2.2 calls for an alignment of the CIP with the Comp Plan Vision, "to ensure public dollars are spent as efficiently and effectively as possible."

Please consider adding a condition to the Comprehensive Plan that requires the CIP process to justify expenditures with a similar justification on how this spending supports the Vision with Centers and Corridors just as would be required of a private project. The language in Strategic Action 2.2 is a good start but stops short of such a requirement.

Respectfully submitted,

Jim Wible, CCIM
Director
jimw@gotSPACEUSA.com

NAI Maestas & Ward
6801 Jefferson NE Suite 200
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NAI Maestas & Ward

COMMENTS FROM NEIGHBORHOOD ASSOCIATIONS

Received prior to the 48 hour rule deadline of August 2, 2016 at 1 pm

Reed, Terra L.

From: Patsy Nelson <patsyncnelson@msn.com>
Sent: Monday, August 01, 2016 4:03 PM
To: Planning Comp Plan-UDO
Cc: aboard10@juno.com; jakalyn@msn.com; KENBrudos@aol.com; pam.bell01@comcast.net; wolcott@swcp.com
Subject: Official EPC Comments on the ABC Comp Plan

Chair Karen Hudson,

The Alban Hills Neighborhood Association is not in favor of any changes that reduce the opportunity for public input on land use and zoning issues. Furthermore, the Plan should be written so the average citizen can easily find and understand the pertinent information concerning a project or neighborhood. Planners and developers deal with these issues every day and therefore know exactly where and how to access information, but an affected neighbor most likely does not.

The recent plans to revise the Coors Corridor Revision met with strong opposition from the public because we felt it was unnecessary and made the policies more complicated and less friendly to the neighborhoods. Perhaps this is another one of those instances. Sometimes it is best to leave well enough alone. All neighborhoods are not alike. What works for one does not necessarily work for another. While we can understand the need for standardization, smaller localized plans are more responsive to the neighborhoods and, therefore, better understood and received by the public.

Thank you for your consideration.

Patsy

Patsy Nelson, President
Alban Hills Neighborhood Association
505--228-5087 (cell)

Be kind to one another.

Lehner, Catalina L.

From: AVALON N.A. <avalon3a@yahoo.com>
Sent: Tuesday, August 02, 2016 10:12 AM
To: Lehner, Catalina L.; Renz-Whitmore, Mikaela J.
Cc: Samantha Pina
Subject: Project #1001195, 16EPC-40031 (ABC-Z Comprehensive Plan)
Attachments: avalon-ABC-Z LTR2 EPC.doc

Letter for the record in the Albuquerque/Bernalillo Comprehensive Plan, Project #1001195, 16EPC-40031, is attached.

Please see that Ms. Hudson and the commissioners get a copy. Also, please acknowledge receipt of attachment.

Thank you.

Lucy Anchondo
President
Avalon NA

Project #1001195, 16EPC-40031 (ABC-Z Comprehensive Plan)
Letter to EPC from Avalon Neighborhood Association

Avalon Neighborhood Association

avalon3a@yahoo.com

August 2, 2016

Ms. Karen Hudson, Chair
Environmental Planning Commission
600 2nd Street NW
Albuquerque NM 87102

SENT VIA ELECTRONIC MAIL ONLY

Staff Planners: Catalina Lehner (clehner@cabq.gov) and
Mikaela Renz-Whitmore (mrenz-whitmore@cabq.gov)

RE: Project #1001195, 16EPC-40031 (Albuquerque/Bernalillo County Comprehensive Plan)

Dear Commission Hudson,

We understand that ABC-Z intends to update the Albuquerque/Bernalillo County Comprehensive Plan and create an Integrated Development Ordinance and that the project will simplify the city's zoning and subdivision regulations. The ABC-Z team has conducted outreach to the community, and there have been numerous meetings and public hearings, which several west side communities have attended. Mikaela Renz-Whitmore has done a fine job at these presentations. However, there are some concerns that I will point out in this correspondence.

This has been an ambitious two-year project, but as huge an impact that this project will have on the the City of Albuquerque, two years to get this right for the community is not quite enough time for the neighborhoods to review the proposed plan. The project kicked off in February 2015 and here we are, already at the EPC study sessions 17 months later and the EPC hearings the following month, and the neighborhoods are not even close to reading the final draft in it's entirety!

The community has "listened to" the information presented at these meetings. As you know, that not all significant details can be covered in a meeting, not even in a series of meetings. We understand that the information is also posted on the website, but not everybody has access to a computer, and quite frankly, we need to be able to read off a hardcopy. Reading so much data off the computer is difficult and straining. We would have also liked to have met together with others and compare notes. We need to be able to highlight and write on something tangible.

The City and the County going "green" has made it more difficult and costly for the neighborhood associations to have access to the written materials pertaining to projects that are of interest to them (particularly the Staff Reports). The information on the ABC-Z project contains so much information, much more than a staff report. The neighborhood associations having to print City and County documents are very costly. Also, having to "borrow" the books or check them out at the library is not really suitable for our great need to review more thoroughly. This process did not allow enough time and enough people to use the written materials at the same time. Again, we cannot highlight or make notes on these borrowed hardcopies.

We have obtained the ABC-Z project information in bits and pieces--after an update, what we have read before, had changed. The very thick drafts completed June 2016, were available for loan, 1 set per neighborhood association, at the EPC study session of July 7th. Some of the neighborhood associations did not obtain a borrowed copy until July 28th, and comments to the EPC are due by 1 pm, August 2nd.

Project #1001195, 16EPC-40031 (ABC-Z Comprehensive Plan)
Letter to EPC from Avalon Neighborhood Association

What would have been best for the community, pertaining to the review of the proposed project, would have been for the project to give each neighborhood association, specifically the ones who attended the meetings, and/or those who asked, upon request, a copy of the proposed June 2016 Comprehensive Plan, together with the Comp Plan Policy Matrix, for review, with an option to purchase extra copies at a reduced rate, or at least the the cost of a set, when bulk printing, and not at the 50¢ per page rate.

In addition, the West Side has been bombarded with several projects occurring both, successively and concurrently, such as local multifamily developments, which would adversely affect our local schools with existing overcrowded conditions, the Santolina project, the ABC-Z project, the ART project, and the recent Westland Master Plan project (County). The west side neighborhood association members have had to attend numerous meetings and hearings on all these projects, every month, for the past several months, in addition to our monthly community meetings. Consequently, some neighborhood associations cannot afford printing expenses, especially when there are so many projects going on, one right after the other, and so many pages to print in each case.

For these reasons, we do, indeed, request for more time, and not just 30-60-90 days. The community needs a few months to be able to read and review the proposed comprehensive plan. In the short time that we've been allowed to look at the last edited version, it's like having to work a Rubik's cube, switching back and forth, to get all the pertinent information on each of the changes. The project is not at the 2-year mark yet, so there is plenty of time to allow us this opportunity to read things through.

Another concern, of course, pertains to the overcrowded school issues and approving multifamily developments in their district, which would adversely affect these schools. If you will recall, there have been recent issues with the WSSP Policy 2.5--certain expanded language having been later "repealed," and also the remaining language being interpreted as, all the commissioners and councilors have to do is "consider school capacity" and then ultimately ignore the dreadful conditions at the schools and approve a project that would exacerbate problem. How can this be for the good of the children and the community? (There have been numerous requests for a copy of the Resolution repealing the language of the WSSP Policy 2.5, but for some reason we have never been able to obtain it.)

Although City Planning does not have jurisdiction over APS, and the mantra lately is that the overcrowding situation is "an APS problem, not a City problem," everyone should clearly understand that the overcrowded school conditions are an Albuquerque community problem. APS cannot build schools as quickly as they would like; thus, APS cannot keep up with the multifamily developments being approved and built. So, yes, this is a City problem.

We can't emphasize enough that something needs to be done about approving multifamily developments in the district of schools operating in over capacity conditions. If this is not carefully taken care of at this level, then there is obviously no concern for the repercussions. What if one day, parents wise up and sue, due to these overcrowded school conditions, and then what? Just because a zoning allows for multifamily developments, it does not mean that it would be a good fit for the community, including the schools, as it was recently done to the Avalon and Laurelwood neighborhoods. Nevertheless, there should be some protection for schools in the proposed Albuquerque & Bernalillo County Comprehensive Plan; otherwise, this new process will simply approve projects, regardless of the impact that it would have on the community.

We looked, but could not find any reference to the WSSP 2.5 in the Matrix. We did not find APS' comments in the Staff Report, in order to read the language, in reference to the schools, which APS purportedly approved, as Ms. Renz-Whitmore mentioned at the EPC Study Session of July 28, 2016. However, if APS has approved that language and feels confident that they are protected by the language in the ABC-Z plan, we ask that the City of Albuquerque make absolutely sure that the language is clear and not as ambiguous as "consider school capacity." We would also appreciate the document reference and page number pertaining to the language regarding the schools, with which APS was satisfied.

There is concern with the Coors Corridor name change. Up until the day of the last study session with EPC, we had never heard Coors Blvd. referred to as a "Premium Transit" corridor. We noticed that reference on the map on page 5-15, Centers and Corridors. This presented a red flag to us. The 1984 Rank III Sector Plan established Coors as a Limited Access Parkway and major traffic carrier for the northwest mesa. It also

Project #1001195, 16EPC-40031 (ABC-Z Comprehensive Plan)
Letter to EPC from Avalon Neighborhood Association

established guidelines for the lands adjacent to Coors, and environmental and visual preservation regulations (mountains, bosque, Rio Grande Valley). In 2014, an attempt was made to replace the existing Coors Corridor Plan.

We might have heard Coors referred to as a "limited access major arterial" at some point, but we would like to know when it changed to a "Premium Transit" corridor and we would also like that defined. Our concern is whether Coors is being called a Premium Transit, in preparation to revisit the 2014 Coors Corridor Plan or something similar. If so, where would the Comprehensive Plan leave the community's input, in this case, and any other example, for that matter, if specific changes are being made in the proposed Comprehensive Plan that seem to have been predetermined?

Overall, what concerns us the most about this project is "getting zoning out of neighborhood plans" and virtually eliminating involvement from the community. What we have gathered from the ABC-Z meetings is that projects will basically have a clerical-type approval system. In other words, as long as the applicant meets all the requirements, according to the new Comprehensive Plan, the project will be generally be approved. That indicates to us, regardless of whether it is a good fit for the location and/or whether it would adversely impact the neighborhood, including schools operating above capacity, projects are going to be approved quickly and abundantly. That also means that there will be no need for public input on most of the projects.

It is clear to us that the applicant/landowner/developers will benefit the most (exceedingly) from the ABC-Z Comprehensive Plan, and once again, the neighborhoods will suffer the consequences of unfavorable decisions.

If you give this some thought, you'll see that there would not be much need for EPC hearings, soon after implementation of this plan. This project would weed out both the neighborhoods and the EPC. Consequently, the new process will make the job easier for the Planning Department. (We actually heard these comments, at least 4 times, throughout the meetings.) So, what will this mean for the ONC department? As a matter of fact, would the new system create a reduction in force at the Planning Department? So why would neighborhood associations feel encouraged to keep functioning? We are now being told that none of this will happen, but we are not convinced otherwise.

Furthermore, where would the checks and balances be, as projects are being approved? Pretty much the whole deal would be between the applicant and the Planning Department? What if one person signing off on the project disagrees with the other? Who makes the final decision in that department? Where is the accountability in the approval process? Will there be an unrelated (non-NAIOP affiliated) department, similar to the duties of an underwriter, overseeing what the Planning Department is approving?

The concept of the project makes sense, and we know that sooner or later, it will be approved, but as with ALL other projects, ABC-Z is being pushed through very speedily, right before our eyes. However, ALL of us will have to deal with the consequences of all its shortcomings, should we rush through this and not give the EPC and the neighborhoods more time, and thoughtful and thorough consideration. This is a very intricate project that should not be rushed or taken lightly. Again, there is plenty of time before reaching the 2-year time frame.

We hope that the EPC and City Council will fully consider the draft plan, beyond simply relying on the presentation summaries. We are hopeful that ALL commissioners and councilors will read everything in the June 2016 Albuquerque/ Bernalillo County Comprehensive Plan before making a decision.

Thank you for your time and consideration in this matter. The community of Albuquerque is in your hands.

Sincerely,

Lucy Anchondo

Lucy Anchondo
President
Avalon Neighborhood Association

SHSANA

Sandia High School Area Neighborhood Association

July 28, 2016

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

Dear Ms. Hudson:

Re: Support the use of "Mid-Heights" Neighborhood Designation

On behalf of the Sandia High School Area Neighborhood Association, we have been asked to convey our concern regarding and support for the "Mid Heights" designation of our neighborhood.

To be clear, we are NOT "Uptown", but are happy to be noted as Mid-Heights "close to Uptown".

As you know, Uptown is an Urban Center, with terrific shopping, restaurants, multi-modal transportation, and a plan for higher density housing befitting the "work, play, live" concept.

Sandia High School Neighborhood is a residential neighborhood, planned in the 1950's and 1960's. We have yards, mature trees and landscaping, off street parking, and generally lower density neighborhoods. Because of the recent Albuquerque City Council legislation that proposed permitting secondary dwelling units, Sandia High School Neighborhood is especially sensitive to being included in the term "Uptown" that would, by the definition of the term "Uptown, an urban center" make our neighborhood subject to increased density and burdensome on-street parking.

We appreciate the work that has gone into revising the Comprehensive Plan and applaud such statements as:

4.1.2.1 – Protecting and enhancing neighborhood character . . . As redevelopment and infill occur, policies help ensure that development is consistent with the community's vision and compatible with the surround area.

Community Identity - page 4

Neighborhood Associations . . . The City and County defer to how residents and local stakeholders draw these boundaries to organize themselves. *Community Identity, page 5.*

But on page 4-8, Figure 4-1: Neighborhoods by Historic Development Era marks our Neighborhood Area as "Uptown".

For long-time residents, there is nothing historic about this designation. There is a perceived threat that our City Planners will simply allow the take-over of our neighborhoods with secondary dwelling units simply because the area has been casually defined as Uptown.

The insert on page 4-12, Mixed-Use Neighborhoods: 2000-Present, gives us pause. We like the fact that our Neighborhood is referred to as the "Uptown Area" but are concerned that we are also listed in the "Area of Change" verses the "Areas of Consistency".

We are aware that this issue has been brought to the attention of the Planning Department Staff. That recognition and care is evidenced in section 4.1.3 Community Planning Areas, page 4-17, Figure 4-2 Community Planning Areas, where our Neighborhood is listed as "R" Mid-Heights, and on page 4-18, Figure 4-3: County Sector Development and Area Plans, where again our Neighborhood is labeled "Mid-Heights.

In section 4.1.3.3 City Community Planning Areas, page 4-28, the Mid-Height, correctly describes our Neighborhood area and notes that the "Uptown Urban Center" is a focal point. In the Land Use section of the plan, there are several places that note the boundaries of the "Uptown Urban Center" which is roughly Pennsylvania to San Pedro and I-40 to Menaul, with a carve out for the ABQ Park Neighborhood from Pennsylvania to Espanola and Indian School to Menaul.

Everything appears to be in place to consistently identify our neighborhood area as the Mid-Heights, with one exception, the local Realtors and MLS listings refer to the area from I-40 to Montgomery and San Mateo to Eubank as "Uptown". This casual identification of the area gives rise to the concern that all the neighborhoods will become "high density" neighborhoods.

We have expressed our concern to the Greater Albuquerque Association of Realtors (GAAR) and appreciate how difficult it is to re-label mapping tools. It is our hope that GAAR will be able to make a subtle change from labeling the area "Uptown" to "Uptown Area" making the concept inclusive of our established neighborhoods.

Again, thank you for your diligent effort in reviewing and revising the Comprehensive Plan, and for consistently being sensitive to defining the Mid-Heights area as such, of which, Uptown Center is a part and focal point.

Sincerely,



Janice E. Arnold-Jones
7713 Sierra Azul NE
Albuquerque, NM 87110
SHSANA D7 Representative



Mike Kiou
7901 Palo Duro NE
Albuquerque, NM 87110
President,
Sandia High School Area NA (SHSANA)

Reed, Terra L.

From: SRMNA <info@srmna.org>
Sent: Tuesday, August 02, 2016 8:01 AM
To: Planning Comp Plan-UDO; Renz-Whitmore, Mikaela J.
Subject: written comments for EPC hearing on Comp Plan
Attachments: EPC--Comp Plan.pdf

Please include this letter in the written comments for the August 4th EPC Public Hearing

Thank you,

Ms. Em Ward, President

--

S. R. Marmon Neighborhood Association
Albuquerque, New Mexico



www.srmna.org

S. R. Marmon Neighborhood Association
P. O. Box 7434
Albuquerque, New Mexico 87194

2 August 2016

Ms. Karen Hudson, Chairperson
Environmental Planning Commission
c/o Planning Department
600 2nd Street NW, 3rd Floor
Albuquerque, New Mexico 87102

Re: Comprehensive Plan Update

Dear Madam:

The two issues this letter addresses are proposed changes from the West Side Strategic Plan (WSSP) and the proposed change in classification of Coors Blvd. to a Premium Transit Corridor.

Please refer to item 1066 in the Policy Matrix. The proposed Comp Plan severely restricts the language addressing the requirements needed for approval of a residential development in areas where schools are at or over designed capacity. The published 2014 WSSP contains the following:

Policy 1.3: ... Changes of commercial and office zoning outside the centers to residential use is encouraged except where area schools are at or over design capacity. In cases where schools are at or over design capacity, zone changes from non-residential to residential uses should be denied unless the applicant demonstrates that the proposed development will create no net expense in enrollment for area schools. (e.g. senior housing)...

Policy 2.5: When considering approval of subdivisions or site development plans for residential development or zone changes to residential or higher density residential, the City Planning Department shall consider whether local public schools have sufficient capacity to support the increased number of homes. If area schools are at or over their designed capacity, then the requested action should be denied unless the applicant demonstrates that the proposed action will create no net increase in enrollment for area schools. (e.g. senior housing)

I have not found any record of a resolution that approves the weakening of the protection against a worsening problem.

Residents in our area have repeatedly requested increased bus service to the West Side, i. e., more than one local route on Coors Blvd. and service that goes into the neighborhoods. Please note that changes proposed in the Coors Corridor Plan Update of 2014 failed to garner adequate support from West Side residents and City Councillors.

Sincerely,

Em Ward, President

copy: file

505.225.0126

info@srmna.org

Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Tuesday, August 02, 2016 1:08 PM
To: Lehner, Catalina L.
Cc: Renz-Whitmore, Mikaela J.; Barkhurst, Kathryn Carrie; Toffaleti, Carol G.
Subject: FW: OOPS.....Use this letter
Attachments: CommentsMay2016Draft.pdf

This is the last of the comments before the deadline.

I will also forward the original email in case you want to include it or note it.

Thanks,
Terra

From: Jolene Wolfley [<mailto:sagehome@live.com>]
Sent: Tuesday, August 02, 2016 1:01 PM
To: Planning Comp Plan-UDO; Renz-Whitmore, Mikaela J.
Subject: OOPS.....Use this letter

I noticed a typo in my subject line in the earlier version.

Please use this version.

Thank You.



P.O. Box 66288
Albuquerque NM 87193-6288

August 1, 2016

Karen Hudson, Chair
Environmental Planning Commission
City of Albuquerque
(sent via email)

Re: Albuquerque/Bernalillo County Comprehensive Plan of 2016

Dear Chair Hudson and Members of the Environmental Planning Commission:

The Taylor Ranch Neighborhood Association has reviewed the Comprehensive Plan and the Board thinks that good topics are under discussion, but that the Plan still needs improvement before it is approved. We also ask that Sector/Area Plans on the Westside be retained until Community Planning Assessments are completed in Taylor Ranch/Westside. We encourage careful consideration by the EPC for such a massive change in the City's planning policy and regulatory documents.

A. TRNA has these general comments on the Comprehensive Plan:

1. The Vision document falls short of giving a distinct "vision" for Albuquerque's unique future. (See unanswered questions in part B of this letter.)
2. Extracting some sector/area plan policies and putting them into the Comprehensive Plan is a "weak" version of those sector/area plans. Too much of the context and policy foundation is missing. This background information helps people understand policy intent as they implement the policies/regulations. The background information is also useful to the analysis when someone wants to get an exception or amend the original policy. Also many existing policies are not fully accounted for in the Comprehensive Plan.

The sector plans now give a 'vision' for that sector. All the 'sector visions'—which represent substantial city, property owner, and community investment—need to be maintained.

3. The Areas of Stability and Change Map should be considered the beginning of an analysis. It should not become the basis for rezoning decisions. If such a map is put forward, it would need to be reconciled with policy in the area/sectors plans and in the Planned Growth Strategy.
4. We want to retain the SU-1 zoning and site plans existing in Taylor Ranch, particularly where we have natural features like the Bosque/River.

B. TRNA thinks that major questions about Albuquerque's future remain unanalyzed in the Draft Comp Plan. We would like to see these questions analyzed and developed into strategies to guide Albuquerque's future:

1. How will the City and County work together as partners and not competitors when it relates to growth?

In the past, lands that were to be developed with a suburban or a denser pattern were annexed to the City. This kept the County as the steward over rural lands and the City steward over city land. Past legislative changes have allowed the County to retain land developed at an urban scale, e.g., Santolina. This creates a less than ideal dynamic for City County cooperation and for jurisdictional specialization over urban and rural development. The implications of this (i.e., costs of infrastructure and service provision) should be analyzed and strategized in a Comprehensive Plan for both the City and the County. (See specific comments in D.1, D.2 and D.3 below.)

Land Use Element, page 5-7 shows a table of developed and vacant land. The County is shown with 160 square miles of vacant land. The City of Albuquerque is shown with 27 square miles of vacant land. From a vacant land standpoint, the County may have a competitive advantage to capture more new development. (See also page 5-12 for land balances between County and City's Area of Change.)

The County is also retaining its traditional planning tools, while the City seems to be focusing on urbanizing centers. What factors will lead developers to make urban centers? If the market still wants to build suburban style development, the County would have a competitive advantage over the City in capturing new growth.

Ignoring City development vis a vis that County development will likely mean the City will capture less new growth and tax base than will Bernalillo County.

2. What are the full policy implications of the Map of Areas of Stability and Change? Is the Map reconciled with existing policy in Area/Sector Plans and the Planned Growth Strategy?

The map of Areas of Stability and Change should be considered a starting point of a study and is not ready for the Comprehensive Plan as yet. These designations were derived mostly by calculations of proximity to centers and corridors? There are potential large consequences for property entitlement from these designations. Substantial consequences could exist for neighborhoods in proximity to these corridors. How will those designations and R-270 be used to evaluate zoning changes?

For example, much of the Coors Corridor in the Taylor Ranch area is developed, yet the designation is "area of change"? This brings about a great amount of uncertainty for property owners throughout our neighborhood. On the other hand, very little land along the I-40 West interstate is designated as an area of change. This may need to be reversed.

The City developed a comprehensive Planned Growth Strategy in early 2000s. This work includes much policy on where and how growth is most advantageous to the City. It creates

a structure for reviewing infill alongside developing in new areas. Has this body of work been used to inform the Comprehensive Plan and any mapping of areas of stability and change? Each area and sector plan has detailed policy about what parcels might be suitable for change. The areas of stability and change need to be reconciled with all of the area and sector plans which represent existing city policy and consensus. Then new areas of change could be proposed in conversation with the community.

(See specific comments in D.4 and D.5 below.)

3. How should the City take strategic advantage of its open space network? How should the open space network be expanded?

The open space network is important as an ecosystem, an economic development tool, and a recreational opportunity. Yet strategic policy on the opportunities provided by the network is not developed in the Comp Plan. City policy on how to develop adjacent to open space features (foothills, river, escarpment) is not well formed. There seems to be only a map of the existing network. (Land Use page 5-13 “Community Green Space Network”) (We should retain the term “open space” in Albuquerque in lieu of “green space.”)

No policy guidance is given to new acquisitions. New acquisitions are needed to connect the open space network east and west as most holdings are north to south features. The east west connections would enhance the ecosystem, enhance recreational opportunities, and could promote non-automobile modes of travel. Thinking beyond the lands currently developed, the City should consider how the Rio Puerco should be preserved and how it will connect to the existing open space network?

New open space acquisitions should be based on actual topographic features with ‘resource value’ and how the lands connect the ecosystem. Some of these features are: mountains, rivers, volcanoes and escarpment, arroyos, drainages, lands retained for farming.

4. The Centers and Corridors is a good concept for the city’s growth. Since that concept has been in place for about 15 years, staff should thoroughly evaluate what is working and what is not working in the marketplace to implement that vision.

Where have centers developed according to plan and why? Where have corridors worked according to the Plan and why? What impediments have been evident over the past 15 years to this concept and how can they be overcome in the future?

If the City relies heavily on the Centers and Corridors concept for the next several decades of growth, without understanding how it has worked or failed, we may see growth going to the County instead of the City.

As an example, Coors Boulevard is designated as a Corridor and Coors/Montano is designated as a center. The approved site development plan was for a mixed use pedestrian area, e.g. a ‘center.’ The Planning Staff did not discourage the application. The citizens in the area spent two years working to defend the site plan and work to see that a large grocery store anchored suburban type development was not approved for that corner.

What does this new Comprehensive Plan do to protect vacant land in a key ‘center’ from being developed as a suburban-style shopping center? There is no obvious improvement in

the proposed Comp Plan to make centers happen when there are still strong market forces for suburban scale development.
(See specific comments in D.5 below.)

5. What strategies need to be in place to make sure that parcels at interstate interchanges (I-25, I-40)--which have the highest accessibility in the metro area--are developed to have maximum benefit to Albuquerque?

Albuquerque's interstate system is in the shape of a "t" through the heart of the City. Land adjacent to interchanges is and will remain the most accessible land in the metro area. The freeway interchanges are the major strategic parcels of land for the City of Albuquerque. The interstate and sites adjacent to it also evoke an "image" for the City that influences major corporations considering locating in Albuquerque. The I-40 west area still has much development potential.

Land Use Element, page 5-15, Centers and Corridos Map. This map/concept lacks analysis of the strategic importance of the interstate system in the development of employment centers. What developments take the most advantage of the Interstate's accessibility? Why are most freeway interchanges not considered for employment centers? As a city's grow and congestion increases, it often returns to put development at freeway interchanges because of their high accessibility. Denver is an example where office buildings, transit stops, and parking structures are built at freeway interchanges. Albuquerque would do well to think of this now before all the vacant land around freeway interchanges is built out in low density developments.

Also, how can development be managed over time so that unsightly development along the interstate is avoided/improved so as to maintain a positive 'image' for the City.

6. How will 'smart cars' affect the need for transportation infrastructure?

'Smart car' technology brings 'real time data' to drivers as they choose time of day to travel and travel routes. As drivers are informed about congestion, they have the choice to alter their travel behavior. Smart cars also give more opportunities to 'price' drivers for traveling on congested facilities. How do these technologies change the sentiment "to build our way out of congestion" with new facilities? Instead of adding lanes or grade separating, are there other 'infrastructure' investments that enhance the smart car technologies?

The Transportation Element does not analyze how the change to smart cars could or should influence the type of transportation infrastructure to be built in Albuquerque.

7. What is the strategic vision for investing in transit?

Albuquerque is pursuing ART on Central Avenue. Albuquerque also has investigated a major BRT or light rail line from the Jefferson corridor to Volcano Heights? What measures can be taken to make sure those investments are maximized? What development would allow more users to locate near those stations? What development is appropriate given the neighborhood context around the 'station'? Are connecting bus lines and park- and-ride parking lots adequate to get users to the BRT/light rail lines?

8. What are the future roles of the Sunport and Double Eagle airport?

How do those airports play into future economic development scenarios? How should land around the airport be planned/zoned so that airport expansions can occur without costly mitigation of airport noise? Should land around these airports be an “area of change”?

9. How can the jobs/housing imbalance be improved?

How can the city attract base employment west of the Rio Grande? Will Volcano Heights and Mesa del Sol areas be able to attract base employment? When should full development rights be granted to Santolina? How will transportation investments incent development to occur in one location versus another?

10. How will the shift of purchasing from ‘brick and mortar’ stores to internet purchases affect the layout of Albuquerque’s commercial areas? How does other internet business affect office development (banks, etc.)? How does all this affect ‘centers’ and other commercial areas?

11. What distinct policies can be written to protect many Albuquerque neighborhoods with rich cultural resources? Policy statements saying neighborhoods should be protected are inadequate protection when developers present new developments to the City that are contrary to neighborhood character.

12. Many of Albuquerque’s neighborhoods have housing stock that is deteriorating? What policies on neighborhood maintenance can slow or reverse this deterioration? What public/private investments can infuse new life into deteriorating neighborhoods?

13. Are we losing excellent policy detail on the Westside if area and sector plans are replaced by this draft Comprehensive Plan?

While it seems that many policies lifted from the sector plans would be useful in the Comprehensive Plan, it **does not** follow that the Comp Plan serves as a replacement for the sector and area plans. The sector and area plans on the Westside are full of context, history, vision, and detailed policies for that ‘sector’ or ‘area’. The Draft Comprehensive Plan is inadequate to replace these plans:

- Volcano Mesa Plan amendments to the Westside Strategic Plan
- Volcano Heights Sector Development Plan
- Volcano Cliffs Sector Development Plan
- Volcano Trails Sector Development Plan
- Coors Corridor Plan
- Northwest Mesa Escarpment Plan
- Westside Strategic Plan

Why remove existing sector/area plans and then require community assessments?
(See specific comments in D.7 below.)

C. TRNA thinks there needs to be a clear path to utilize all the geographic related policy in the sector plans listed above for the Westside. We advocate that these Sector Plans be retained with this Comprehensive Plan. When and if the Community Planning Areas Assessments are begun, then staff can consider the sector plans and how to use that established policy in the Community Planning Area Assessments.

D. More detailed comments on specific Draft Plan Elements follow:

1. Recommend changes to policy in Reserve areas section of Land Use Chapter

Policy 5.5.2

Reserve Areas: Allow opportunity for future development of high quality, mixed-use, largely self-sufficient planned communities, bounded by permanent open-space, in appropriate outlying areas, and to protect the non-urban development areas as Rural unless such planned communities are developed. [BC]

Is there a community that has developed as a ‘largely a self-sufficient community’ in our area? This reserve policy anticipates the creation of something that might be unattainable. All communities, even master planned communities, would be tied to the economy, water, wastewater, and education system of the greater Albuquerque area.

Base employment will locate based on regional location factors (transportation, land markets, raw materials, labor markets, etc.) not because of a demarcation of a ‘planned community development.’ The only jobs that could be guaranteed for a ‘self-sufficient community’ would be service jobs (retail, medical) that serve the residents of the planned community. Most other employment will cross various demographic and skills groups, and therefore, usually cross community boundaries.

Water and wastewater systems are regional and cross community boundaries. All planned communities will need to tie into the Albuquerque-Bernalillo County Water Authority. All wastewater systems would eventually be tied to the regional wastewater treatment and the Rio Grande.

A school system is generally the biggest tax burden for the community. Both capital to build schools and money to operate them year-after-year need to be considered. Would a planned community run its own school system?

The only possible candidate for a ‘somewhat’ self-sufficient community would be a retirement community of empty nesters....where most residents are no longer in the workforce and do not have children to send to school.

2. Recommend reconsideration of density for the County Semi-Urban Areas.**5.5.4. c**

“Maintain overall gross density up to three dwelling units per acre, or as specified in County Sector Plans.”

The suitable density for the County--with rural development standards--is probably a gross density of one dwelling unit per acre. The County should remain specialized in rural development in those locations where rural development makes sense (Comp Plan identifies most of those areas). The County could then retain a clear set of policies and standards related to infrastructure and services for a rural community.

It would also make sense for the City to annex any development that is of a suburban or urban density. The City would retain a clear set of policies and standards related to infrastructure and services for an urban community.

3. Recommend the Map of Areas of Change and Consistency be dropped from the Comp Plan and instead be used as a background study.**Action 5.6.2**

“Areas of Change: Direct growth and more intense development to Centers, Corridors....”

The Areas of Change and Consistency Map could have sweeping effects on property rights and rezoning potential. The above statement gives too much authority to a map that is a theoretical study and not vetted policy. Too little attention has been given to existing City policy on where growth should go (refer to area and sector plans and the Planned Growth Strategy).

The Comp Plan states that the criteria for areas of change are basically proximity to centers and corridors. Changes to land use in proximity to major transit oriented-centers makes sense because of high transportation accessibility. Encouraging change to land use in proximity to corridors would often not make sense. It could even prove counterproductive to the center concept.

For example, the Westside Strategic Plan Update in early 2000s determined that there was an oversupply of vacant commercial land along Coors Boulevard and at planned ‘centers.’ City planners recommended removing some smaller centers. They also recommended removing certain quadrants of larger centers because there would be no pedestrian linkages across a heavily travelled arterial. The intent was to capture the commercial market where it would be most beneficial to true ‘center’ development and not have the commercial market spread all up and down Coors.

Another consideration is how developers react to land markets and the price of land. If you make all the land along a corridor a potential change area, you will have developers seek out the lowest cost land for development and that will **not** usually be the land that is

designated as a 'center.'

People have already invested in commercial and residential properties based on existing plans and zoning. Many of the existing area and sector plans have thoughtful analysis and community dialogue about where "change" should occur. The proposed map would be very disruptive if it is not reconciled with existing policy.

Designating 'areas of consistency' could also prove problematic. The infusion of new development is often needed as commercial and residential properties age. It may not be prudent to signal to the market that new development is discouraged in established areas.

In contrast, there should be more emphasis on discouraging development on undeveloped land (sprawl) outside the current infrastructure system. An example is the entire Paseo del Volcan Corridor and around Double Eagle Airport.

4. Recommend that the analysis of development absorbed by theoretical areas of change not be used to justify the policy for Areas of Change.

Area of Change Methodology: "The analysis demonstrated that 92% of projected new housing and 97% of projected new employment between now and 2040 could be accommodated in Areas of Change."

This analysis is an interesting theoretical data point, but it is **not** analysis of market realities and existing development policies and entitlements. New economic-base employment will have a variety of factors at play when deciding where to locate. Those factors could overrule and conflict with a "Map of Change."

The market for housing is constantly evolving. Households are regularly making choices between the costs and benefits of denser housing compared to less dense housing. Since the Albuquerque Bernalillo marketplace has much affordable single family housing, it might mean the millennials tendency to urban living may not be quite as pronounced in Albuquerque as in other urban areas where single family homes are more costly.

5. Recommend the Centers and Corridors Map not imply that all quadrants of an intersection will be the 'Center.'

Many communities have found that freeway interchanges and major arterials have only one to two quadrants that successfully develop as an urban center. The design of the street (width, number of lanes, speed, volume of cars) can make crossing the intersection hostile to pedestrians. The Draft Plan does refer to the importance of pedestrian linkages for the center. Therefore, there are many 'centers' where the focus should be on one or two quadrants of the intersection and not the entire intersection. Each Center should be reviewed to see what quadrants of the intersection should make up the "Center."

The Centers map shows an urban center at Coors and Montano. The WSSP amendments done in early 2000s determined that an urban center would not occur straddling two major arterials, i.e. Coors and Montano. It was determined that only the quadrants east of Coors would be the Community Activity Center. Development has been allowed to

take place on the parcels in the west quadrants without the features of an urban center. The effort to create an urban center at this intersection is now focused on the east side of Coors, and, most particularly, at the vacant southeast corner of Coors and Montano. This site has an approved site plan for subdivision with requirements for the development of an urban village. The mapping of 'centers' should account for the uniqueness of each 'center.' (Note: The Plan says that Comp Plan boundaries for center were chosen over WSSP boundaries. It might be best to do the opposite based on past planner's work.)

Another example is Volcano Heights Sector Development Plan. The focus of the urban center is the northeast quadrant of the intersection of Unser and Paseo del Norte. The other quadrants could have some active uses, but the real "center or mini-downtown" for pedestrian activity is focused at the one quadrant.

Freeway interchanges are particularly important to evaluate in terms of where pedestrian-oriented development will occur. It is also important to evaluate the local street network around that interchange quadrant to determine access suitability.

- 6. Recommend that you give more value to planning work completed over past decades before you replace that work and call for substantial new work that is not funded.**

Policy 4.2.1

"Use Community Planning Areas to....organize planning efforts to identify distinct community character."

Policy 4.3 missing

Policy 4.5.9 Northwest Mesa CPA

Policy 4.5.12 West Mesa CPA

It does not make good fiscal sense to deconstruct sector and area plans (that were funded by the taxpayers in the past) to then construct 'new' Community Planning Area Assessments. No funding for these assessments has been identified. TRNA advocates making the best use of existing plans which are already paid for by the public. We encourage the use of today's technology which can manage data efficiently. It can synthesize the multiple plans/policy statements affecting a parcel of land to help make existing plans easy for planning staff, developers, and the community to use.

The Taylor Ranch Neighborhood is over 35 years old and one of the most active neighborhood associations in the City. TRNA thinks it will harm our community to be split at Montano and be divided into two CPAs. Please rethink the boundaries of these CPAs on the Westside. A better division is Western Trail.

The Comprehensive Plan is a monumental undertaking and we thank staff for their hard work. We ask the Environmental Planning Commission, to take their time to identify all the improvements that are still needed in the Comprehensive Plan now before them before sending it to the City Council.

Respectfully,

Jolene Wolfley, Director of Government Affairs
Taylor Ranch Neighborhood Association

COMMENTS FROM ORGANIZATIONS

Received prior to the 48 hour rule deadline of August 2, 2016 at 1 pm

Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Tuesday, August 02, 2016 1:07 PM
To: Lehner, Catalina L.
Subject: FW: Official EPC comments for Comp Plan from County
Attachments: County official comments.pdf

For the record.

Thanks,
Terra

From: Catherine VerEecke [<mailto:cvereecke@bernco.gov>]
Sent: Tuesday, August 02, 2016 12:50 PM
To: Planning Comp Plan-UDO
Cc: Toffaleti, Carol G.; Renz-Whitmore, Mikaela J.; Barkhurst, Kathryn Carrie; Enrico Gradi
Subject: Official EPC comments for Comp Plan from County

Hello Terra,
As requested by Carrie, here is a letter from Bernalillo County for the Comprehensive Plan request for Thursday's EPC hearing. Let me know if you have any questions.
Thanks, Catherine



Catherine VerEecke
Planning Manager
Planning and Development Services
111 Union Square SE, 3rd Floor, Albuquerque, NM 87102
Email: cvereecke@bernco.gov
O: (505) 314-0387
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Manuel Gonzales III
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Treasurer

August 2, 2016

Karen Hudson, Chair
Environmental Planning Commission
abctoz@cabq.gov
City of Albuquerque Planning Department
600 2nd St. NW
Albuquerque, NM 87102

Dear Chair Hudson,

This letter is to acknowledge Bernalillo County's participation in and support of the Comprehensive Plan update that is currently in the City's public hearing process. The update, which officially began early last year, has involved many hours of staff time, including research, analysis, and drafting of the plan, along with numerous meetings among staff and agencies and with the public. Bernalillo County staff has actively participated in the review process and has appreciated the efforts of the update to enhance the more specific planning frameworks of the City and the County while addressing common areas of regional concern, such as transportation, parks and open space, cultural heritage, and the natural environment. We and look forward to the review of the document within the County's public hearing process as it relates to the specific needs of Bernalillo County.

Please feel free to contact us if you have questions.

Sincerely,

ENRICO GRADI

Enrico Gradi
Director
Planning and Development Services
Bernalillo County

Lehner, Catalina L.

From: Reed, Terra L. on behalf of Planning Comp Plan-UDO
Sent: Tuesday, August 02, 2016 1:06 PM
To: Lehner, Catalina L.
Cc: Barkhurst, Kathryn Carrie; Toffaleti, Carol G.; Renz-Whitmore, Mikaela J.
Subject: FW: Official EPC Comments on the ABC Comp Plan
Attachments: BikeABQ ABC-Z plan letter_EPC.pdf

For the record

Thanks,
Terra

From: Austin Wetsch [<mailto:awetsch@gmail.com>]
Sent: Tuesday, August 02, 2016 11:46 AM
To: Planning Comp Plan-UDO
Subject: Official EPC Comments on the ABC Comp Plan

Hello,
Please see attached letter from BikeABQ's comments for the ABC Comp Plan.

Thank you,
Austin Wetsch
President
BikeABQ



Bike ABQ
PO Box 4119
Albuquerque, NM 87196-4119
board@bikeabq.org

Date: August 2nd, 2016
To: Chair Karen Hudson
From: BikeABQ
Re: Official EPC Comments on the ABC Comp Plan
Dear Chair Karen Hudson,

BikeABQ and its members would like to voice our support with considerations for the approval of the ABC to Z project as it relates to bike lanes/paths listed in the plan.

We understand that this is a very complex plan that will need constant tweaking throughout its development, but we feel this is a vital step and important document in continuing to develop a more multi-use friendly roadway infrastructure throughout the city. Due to the vast and complex nature of the project, BikeABQ is not going to list specific areas of concern in the plan in this letter, but want to point out that there are certain proposed projects in various neighbourhoods that will need re-working and we hope you will listen closely to those who use these roadways and their suggestions about how to better improve the plan. The purpose of this letter is to ensure that cycling infrastructure is handled effectively and with equal importance throughout the life of this project.

Please feel free to reach out to us and our members if guidance is needed in analysing specific developments related to bike lanes/paths during the course of this project.

BikeABQ was founded in 1998 our mission statement is: *Supporting, Educating, and Advocating for a Bike-Friendly Albuquerque. Our mission is to increase the number of bicyclists in Albuquerque for transportation, health and recreation. We provide education, advocate for the rights of cyclists, and work to create and preserve safe biking environments. We follow the League of American Bicyclists "5 E's" (Education, Encouragement, Enforcement, Engineering, and Evaluation & Planning) as well as our dedication to the Environment and Health.*

Sincerely,

A handwritten signature in black ink, appearing to read 'Austin Wetsch'. The signature is written in a cursive, somewhat stylized font.

Austin Wetsch

President
BikeABQ