



Sysco Corporation
1390 Enclave Parkway
Houston, TX 77077

sysco.com

December 16, 2016

Savina G. Garcia, PE
WILSON & COMPANY INC. (agents for the City of Albuquerque, Edith Waste Transfer Station Project)
4900 Lang Ave. NE
Albuquerque, NM 87109

Dear Ms. Garcia:

On behalf of Sysco New Mexico, I am writing to request a deferral of the Environmental Planning Commission scheduled for next month.

We recently learned the City of Albuquerque has applied for a zone map amendment change for the Edith and Comanche solid waste transfer station site. We are aware surrounding businesses were notified of this application, but we received no such notification. Further, we learned from a business neighbor that a proposed meeting between the City and interested parties has been discussed; however, we are getting this information second-hand, were not notified, and have no information regarding this meeting.

Sysco New Mexico submitted a letter to the Albuquerque City Council's hearing on October 17, 2016 to support the appeal of the June 10th declaratory ruling for the transfer station, issued by the Code Compliance Official (AC-16-9). Considering the size and economic impact of Sysco New Mexico, in addition to our close geographic proximity to the site—our southwest boundary is less than 100 feet from the proposed location—we have a considerable financial interest in this matter, and thus we believe we have standing.

In light of these developments, Sysco will need adequate time to obtain all relevant documents, review such documents, and submit comments and evidence. Since we were never notified of this zone change application and are heading into the holiday season, we have insufficient time to conduct a thorough analysis and prepare a thoughtful response for a January 12th hearing.

For these reasons, we respectfully request that the Environmental Planning Commission hearing scheduled for January 12th be deferred until a future hearing date, but not sooner than February 2017.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gerald R. Kunde, II". The signature is fluid and cursive, with a prominent initial "G" and "K".

Gerald R. Kunde, II
Vice President of Government Relations

cc: John Soladáy, Director, City of Albuquerque Solid Waste Management Department
Jill Holbert, Deputy Director, City of Albuquerque Solid Waste Management Department

HAND DELIVERED

January 1, 2016

Mrs. Karen Hudson, Chair, Environmental Planning Commission, et al EPC Members
600 Second St. NW
Albuquerque, NM 87102

REFERENCING EPC CASE#: 1010582 Section 1.E. *"A change of zone shall not be approved where some of the permissive uses in the zone would be harmful to adjacent property, the neighborhood or the community."*

Dear Chair Karen Hudson and all Environmental Planning Commission Members:

I am Patricia Garcia Martinez to strongly oppose the COA Edith Transfer Station. The change of zoning from M1 to SU1, will allow an operation that will negatively impact adjacent property, the neighborhood, community.

My family has a vested interest in this area, as well as the North Valley proper; going back to the 1600's. How will the proposed zone change be harmful to the neighborhoods and surrounding communities?

I am so very concerned for the residents living in the area, as well as business owners. I walked the area speaking with area citizens living on Los Hermanas, Carlton, Tyrone, Griegos and Edith, as well as parents at the Little League, East of this location.

I have looked into their eyes, heard their heart-felt emotions, in total opposition to what is being proposed by the City officials, in proposing bringing all city, Bernalillo County +?; garbage close to their homes, area and North Valley; where their past generations lived before them. They are very discouraged that the city; is not listening to them about what it will mean to them, bringing this travesty to their neighborhood and what its' affects will do to their health, environment and lives. Some say isn't the city "supposed" to be looking after their interests, well-being, safety; allowing residents their Democracy; "By the People, For the People" and not for all the self interest groups.

The facts are that these neighborhoods and communities are deemed predominately Hispanic origin and are of low income households; but does that justify these negative changes. Everyone affected, will be excluded from experiencing a life free of pollutants, carcinogenic particles of matter, noise, heavier traffic impacts, rats, flying debris and putrid odors?

Why and how can COA EPC Commissioners and their constituents not for-see, the devastating and harmful situation that you will put on this metropolitan area and City at large.

 Patricia Garcia Martinez menudochuy@q.com

RESIDENTS

OPPOSITION

STATEMENTS

4200-4208 EDITH NW

December 20, 2016

Mrs. Karen Hudson, Chair
Environmental Planning Commission
City of Albuquerque
P O Box 1293
Albuquerque, NM 87103

RE: **PROJECT # 1010582 EDITH TRANSFER STATION PROJECT-4600 Edith Blvd. NE**

Dear Chair Hudson:

I am writing you and your fellow Commissioners to implore you to reject the zone map amendment request for the Edith Transfer Station proposed Project.

I have lived at 4200 Edith NE-Apt B for two years and live less than 100 feet from the Solid Waste Departments yards.

The proposed more intensive use for this property will be harmful to my residence by the increased traffic, increased idling of large trucks, as well as private vehicles entering a convenience station. Bicycle traffic will also be adversely affected.

My neighbors and I already put up with a lot of noise odors and acrid odors. Now I am afraid that with up to 2,500 tons of garbage coming into the area, it will surely cause increased rodent and bird activity.

Design of the facility cannot mitigate rodents or bird activity. The City has never been a good neighbor to any of the residents of my area, in the years I have lived in the area. Public meetings have not been productive in producing design modifications.

This is inappropriate in an Urban area. It is one thing to have M-1 zoning all around me. It is quite another to have all of Albuquerque garbage coming into my living area, daily.

It seems like the little guy has to put up with the harmful, intrusive industries.

Please DENY THIS ZONE MAP CHANGE.

Thank you,

Gabriel Benavidez



gblbmn@yahoo.com
4200 Edith NE - Apt. B
Albuq. nm 87107

December 20, 2016

Mrs. Karen Hudson, Chair
Environmental Planning Commission
City of Albuquerque
P O Box 1293
Albuquerque, NM 87103

RE: **PROJECT # 1010582 EDITH TRANSFER STATION PROJECT-4600 Edith Blvd. NE**

Dear Chair Hudson:

I am writing you and your fellow Commissioners to implore you to reject the zone map amendment request for the Edith Transfer Station proposed Project.

I have lived at 4208 Edith NE-Apt A for two years and live less than 100 feet from the Solid Waste Departments yards.

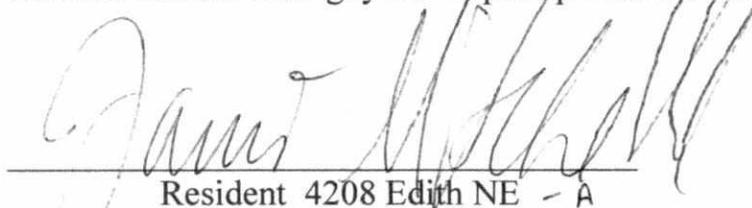
The proposed more intensive use for this property will be harmful to my residence by the increased traffic, increased idling of large trucks, as well as private vehicles entering a convenience station. Bicycle traffic will also be adversely affected.

My neighbors and I already put up with a lot of noise odors and acrid odors. Now I am afraid that with up to 2,500 tons of garbage coming into the area, it will surely cause increased rodent and bird activity.

Design of the facility cannot mitigate rodents or bird activity. The City has never been a good neighbor to any of the residents of my area, in the years I have lived in the area. Public meetings have not been productive in producing design modifications.

This is inappropriate in an Urban area. It is one thing to have M-1 zoning all around me. It is quite another to have all of Albuquerque garbage coming into my living area, daily.

It seems like the little guy has to put up with the harmful, intrusive, industry.


Resident 4208 Edith NE - A

Email: Mitchell@yahoo.com
Phone: 4208-A-Edith NE-87107

Date:

Ms. Karen Hudson, Chair
Environmental Planning Commission
City of Albuquerque
P. O. Box 1293
Albuquerque, NM 871103

RE: Project #1010582 – Edith Transfer Station Project 4600 Edith Blvd. NE

Dear Chair Hudson:

I live at 4209 Edith Unit B. I am writing you and your fellow Commissioners to **URGE** you to **REJECT** the zone map amendment request for the proposed Edith Transfer Station (ETS) project.

I live less than 100 feet from the Solid Waste Department's yards.

The proposed industrial use for this property will be harmful to my residence by: increased traffic increased idling of large trucks, as well as private vehicles entering a convenience station.

Also, bicycle traffic will be adversely affected.

My neighbors and I already put up with a lot of noise and acrid odors. I am afraid that with up to 2500 tons of garbage coming into the area, it will cause increased rodent and bird problems.

The City has **not** considered the impacts of the existing Solid Waste activity for the residents in my location. The proposed ETS project will further jeopardize the **quality of life** for the residents in this area.

The M-1 zoning for this urban area is inappropriate. The increased industrial use of the proposed ETS will bring unnecessary health hazards and create safety concerns to this residential area.

Please, **DENY** this zone map change.

Sincerely,

Signature

Print Name


Martin Arrellin

December 20, 2016

Mrs. Karen Hudson, Chair
Environmental Planning Commission
City of Albuquerque
P O Box 1293
Albuquerque, NM 87103

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It seems like the little guy has to put up with the harmful, intrusive, industry.

Darville Mc Donald

Resident 4208 Edith NE - B

Email: molgool.mo@gmail.com

Phone:

4208-B - Edith NE - 87107

P E T I T I O N S

O P P O S I N G

E D I T H

W A S T E

T R A N S F E R

S T A T I O N

We, the undersigned: sign this Petition to the COA in STRONG OPPOSITION to the Proposed Zone Change, which would allow the COA to proceed with expansion of the Edith/Comanche Waste Transfer Station We, OPPOSE THIS because, permitting this zone change and "All City Garbage to be brought here" would be very harmful to adjacent properties, our neighborhood and the community.

Nosotros, los abajo firmantes: firme esta petición para el COA en fuerte oposición a la propuesta zona cambiar, que permitiría el COA continuar con la expansión de la Edith/Comanche residuos transferencia estación, se oponen a este debido a que permite este cambio de la zona y "Basura de la ciudad de todos de ser traído aquí" sería muy perjudicial para las propiedades adyacentes, nuestro barrio y la comunidad.

| NAME | Address | ZIP | Signature | Phone/Email |
|-------------------|---------------------------------|-------|------------------|---------------------------------------|
| Loren Kahn | 4913 Guadalupe ^{TRND} | 87107 | Loren Kahn | 505-3442186 loren@ |
| Yahweh KESSLER | 4913 Guadalupe | 87107 | | lorenKahn.pupp@comcast.net |
| JANET JENKINS | 4935 " " | 87107 | Janet Jenkins | - |
| DANNEN WOOD | 500 SHIRLEY ST NE | 87123 | | 505-5048481 |
| Kristen Wood | 500 Shirley St | 87123 | | 505-261-6313 |
| Arthur A. Gradi | 6358 4th St NW | 87107 | | 505-350-5867 artgradie@comcast.net |
| Jackie Robins | 800 MONROE | 87107 | Jackie Robins | jackie@comcast.net |
| Maria | 2618 Los Tomates | 87107 | | 1601502123@gmail.com |
| Obina John | 4007 8th St NW | 87107 | | 505-254-4998 |
| Joe Lynch | 2813 TRAS LUCEROS ^{NW} | 87104 | | 610-1258 |
| Gerald BACA | 1743 Los Jardines | 87104 | | 505-3633687 |
| VITORIA BACA | " | " | | vicky.albuquerque@outlook.com |
| Stella Martin | 516 Berry Rd NW | 87107 | Stella Martin | 615-7759 |
| Shirley Arellano | 4633 11th St NW | 87107 | Shirley Arellano | 345-1033 |
| Olivia Jimenez | 5014 5th St NW | 87107 | Olivia Jimenez | 610-6115 |
| Sean Jimenez | 5014 5th St NW | 87107 | | 7305 |
| Steven Chavez | 5 Venado Rd. | 87059 | | 321-8141 |
| Chay Carol | 804 Valencia St | 87108 | Chay Carol | 265-3933 |
| Poppy Norton | 3810 11th NW | | | |
| CAROL CHAMBERLAND | 609 SAN LORENZO NW | 87107 | C. Chamberland | |
| Jerold Cole | 251 Willow Rd NW | 87107 | Jerold Cole | 344-2653 |
| Patricia Cole | " " | " | Patricia Cole | " " |

We, the undersigned: sign this Petition to the COA in **STRONG OPPOSITION** to the Proposed Zone Change, which would allow the COA to proceed with expansion of the Edith/Comanche Waste Transfer Station We, **OPPOSE THIS** because, permitting this zone change and "All City Garbage to be brought here" would be very harmful to adjacent properties, our neighborhood and the community.

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| NAME | Address | Zip | Signature | Phone/Email |
|--------------------|------------------------|-------|------------------|------------------|
| ✓ Charles Smith | 4448 3rd St NW | 87107 | Charles Smith | Charles 9282 |
| ✓ Rachel McElister | 643 9th Street NW | 87107 | Rachel McElister | Rothman |
| ✓ Luenda Estrada | 1424 Gregos Rd | 87107 | Luenda Estrada | luenda_e99@yahoo |
| Joe Marley | | | | |
| Joyce Graham | 229 VINEYARD | 87107 | Joyce Graham | Joyceinistata@y |
| MARIAN PAVONI | 4013 Tulane NE. | 87107 | Marian Pavoni | |
| ✓ Dennis Harrown | 501 Tres Lagunas LN NE | 87113 | Dennis Harrown | cashstone @ gm |
| ✓ Shelly Cavell | 2746 Sierra Dr NE | 87110 | Shelly Cavell | lawga156@ki |
| ✓ Joe Bookumbe | 9617 Robin Avenue | 87112 | Joe Bookumbe | |
| IGOR PONOMAREFF | 1305 1/2 15th N.W | 87104 | I. Ponomareff | ERNRSE2000@YAH |
| ✓ Amalia Torrez | 116 Pequeno | 87107 | Amalia Torrez | |
| Jeanne Michael | 607 Cimarron | 87113 | Jeanne Michael | |
| ✓ Ed DePriest | 4913 Douglas M. | 87110 | Ed DePriest | |
| GLORIA DEPRIEST | " | " | Gloria DePriest | |
| ✓ PAUL SACKSON | Palo Duro | " | Paul Sackson | |
| Robert Hulene | 118 Gregos Rd NW | 87107 | Robert Hulene | 344-6493 |
| Julian J | 118 Gregos Rd | 87107 | Julian J | 344-6493 |
| ✓ Ray Chavez | 818 Palo Duro | 87107 | Ray Chavez | 344-6313 |
| Rita Chavez | 818 Palo Duro NW | 87107 | Rita Chavez | 344 6313 |
| ✓ James Smith | 3713 Palo Duro Av | 87110 | James Smith | |
| Sonia Smith | same as | | Sonia Smith | |
| Francis Busseth | 317 Panorama Pl | 87123 | Francis Busseth | Fbusseth@k |
| ✓ Patsy Flores | 816 Arsenal Rd SW | 87105 | Patsy Flores | |
| ✓ Salli Wehr | 4216 12th NW | 87107 | Salli Wehr | |

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| NAME | Address | ZIP | Signature | Phone/Email |
|----------------------|--------------------|-------|-------------|-------------------------|
| 1. [Signature] | 4627 Las Hermanas | 87107 | [Signature] | 505-379-4807 |
| 2. Pamela Saiz | 4616 Las Hermanas | 87107 | [Signature] | 505-343-6017 |
| 3. Leslie Battrop | 5000 Edith Blvd NE | 87107 | [Signature] | 505-944-9514 |
| 4. George Monter Jr | 5100 Edith Blvd NE | 87107 | [Signature] | 505-710-8163 |
| 5. Sally Mont | 5100 Edith NE | 87107 | SALLY MONT | 505-710-8161 |
| 6. Jason H. Lopez | 5100 EDITH NE | 87107 | [Signature] | 505-261-6716 |
| 7. [Signature] | 5445 Edith NE | 87107 | [Signature] | 505-440-6453 |
| 8. [Signature] | 5445 Edith Ave | 87107 | [Signature] | 505-401-6911 |
| 9. JACOB HOSEY | 5445 EDITH BLVD | 87107 | [Signature] | 505-401-6911 |
| 10. Michael Zapier | 5445 EDITH BLVD | 87107 | [Signature] | 505-401-6911 |
| 11. Steven Zapier | 5445 EDITH BLVD | 87107 | [Signature] | 505-401-6911 |
| 12. Charles Hosley | 5901 Alice Ave NE | 87110 | [Signature] | 505-415-4075 |
| 13. Kent Nufer | 716 Grace St. NE | 87123 | [Signature] | 305-306-6180 |
| 14. Michella Benyard | 8445 Edith | 87107 | [Signature] | Michella@dbch |
| 15. Kimberly Sanders | 16423 Milne Rd NW | 87120 | [Signature] | PrincessHummingbird@net |
| 16. Chloe Olson | 131 Griegos NW | 87107 | [Signature] | colson13@cnm.edu |
| 17. Mary Louise Romo | 2709 Sunlight NW | 87120 | [Signature] | 505-450-6972 |
| 18. R. Basela | 2435 Welford St | 87120 | [Signature] | 505-301-0000 |
| 19. [Signature] | 11111 5th St NE | 87107 | [Signature] | 505-578-6995 |
| 20. Denise Thomas | 41579 Comanche NE | 87110 | [Signature] | 721-4849 |
| 21. Elizabeth Gomez | 49709 Comanche NE | 87110 | [Signature] | 9109323 |
| 22. Roseann Duran | 136 1/2 Hilltop NW | 87107 | [Signature] | 505-550-5541 |
| 23. | | | | |
| 24. | | | | |
| 25. | | | | |

AREA RESIDENTS

SIGNED LETTERS

OF

OPPOSITION

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: Les Jolley

128 Arroyo Rd NW 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

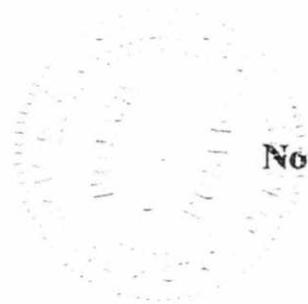
FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC, NOVEMBER 5, 2015.

ENCLOSED PROPERTY INFORMATION IS IN CLOSE PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND FACILITY OF THIS MAGNITUDE IN THE USA. LOCAL AREA RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAVE NOT BEEN ALLOWED TO VOTE ON THIS ISSUE AFFECTING ALL OF US!

Signed: Les Jolley

Date: 2/22/2016

Witnesses: [Signature]
[Signature]



Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019



| | |
|--|---|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 062 450 20518 |
| OWNER 1: | JOLLEY LESLIE J & DEBORA L |
| MAILING ADDRESS: | 128 GRIEGOS RD NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS 128 GRIEGOS RD NW 87107 | |
| LEGAL DESCRIPTION <ul style="list-style-type: none">• LOT 3-B PLAT OF LOTS 3-A & 3-B LOS HERMANOS ADD'N• CONT .1157 AC• | |

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: Mark E. Duran

118 Druce NW 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC, NOVEMBER 5, 2015.

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Signed: Mark E. Duran

Date: 2/22/16

Witnesses: [Signature]
[Signature]



Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: Michelle L. Kelcourse
118 Duigas nw 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

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Signed: Michelle Kelcourse

Date: 2/22/16

Witnesses: [Signature]
[Signature]



Notary: Patricia D. Martinez
Patricia G. Martinez
My commission expires 11/7/2019



| | |
|--|---|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 075 456 20510 |
| OWNER 1: | OLIVAS EILEEN NICOLE & JORDAN DAVID |
| OWNER 2: | OLIVAS-KELCOURSE |
| MAILING ADDRESS: | 118 GRIEGOS RD NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS 118 GRIEGOS RD NW 87107 | |
| LEGAL DESCRIPTION • * 004 LOS HERMONOS ADD | |

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: MARY McDonald
4425 Canyon A/Bu. N.M. 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION
AND TO BRING ALL CITY GARBAGE IN VERY CLOSE
PROXIMITY OF OUR PROPERTY**

**FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC,
NOVEMBER 5, 2015.**

**ENCLOSED PROPERTY INFORMATION IS IN CLOSE
PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF
ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT
SECOND FACILITY OF THIS MAGNITUDE IN THE USA. LOCAL
AREA RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAVE
NOT BEEN ALLOWED TO VOTE ON THIS ISSUE AFFECTING
ALL OF US!**

Signed: Mary McDonald

Date: 2-27-16

Witnesses: Robert Garcia
[Signature]



Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: GERARD McDONALD.

4425 CARLTON NW

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

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Signed: Gerard McDonald

Date: 2/27/16

Witnesses: Hector Barcia
Deey



Notary: Patricia G. Martinez

Patricia G. Martinez
My commission expires 11/7/2019



| | |
|-----------------------------------|--|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 061 392 20205 |
| OWNER 1: | MCDONALD MARY L & GERARD J |
| MAILING ADDRESS: | 4425 CARLTON ST NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS | |
| 4425 CARLTON ST NW 87107 | |
| LEGAL DESCRIPTION | |
| • * 020 LOS HERMONOS ADD S1/2 L20 | |



OWNERSHIP DATA

PARCEL ID: 1 015 060 061 392 20205

OWNER 1: MCDONALD MARY L & GERARD J

MAILING ADDRESS: 4425 CARLTON ST NW
ALBUQUERQUE NM 87107

LOCATION ADDRESS

4425 CARLTON ST NW 87107

LEGAL DESCRIPTION

• * 020 LOS HERMONOS ADD S1/2 L20

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: Nanette McManas

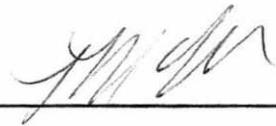
4631 Las Hermanas NW 87107

DATE: February 22, 2016

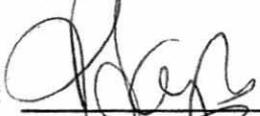
REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

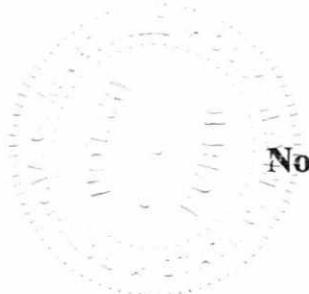
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Signed: 

Date: 2/27/2016

Witnesses: 

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FROM: Derwin Cupp

4631 Las Hermanas NW 87107

DATE: February 22, 2016

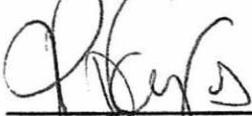
REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC, NOVEMBER 5, 2015.

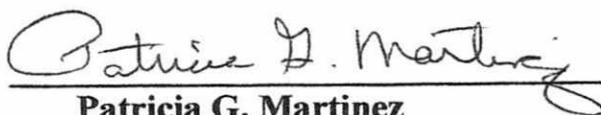
ENCLOSED PROPERTY INFORMATION IS IN CLOSE PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND FACILITY OF THIS MAGNITUDE IN THE USA. LOCAL AREA RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAVE NOT BEEN ALLOWED TO VOTE ON THIS ISSUE AFFECTING ALL OF US!

Signed: 

Date: 2/27/2016

Witnesses: 




Notary: 
Patricia G. Martinez
My commission expires 11/7/2019

TO: WHOM IT MAY CONCERN/CITY OFFICIALS

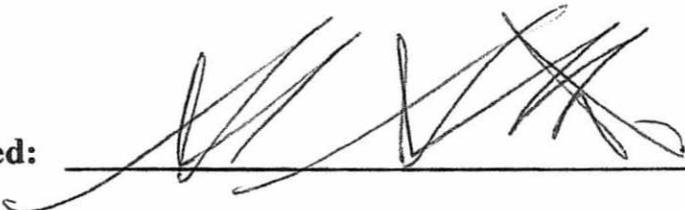
FROM: Angelo Archuleta / Antonette Archuleta
4623 Las Hermanas NW 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

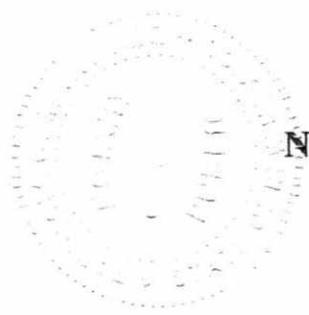
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Signed: 

Date: 2/27/16

Witnesses: 

Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: DANIEL J MARTINEZ SR.

4429 Carlton NW 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC, NOVEMBER 5, 2015.

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Signed: *Daniel J Martinez*

Date: 2-22-16

Witnesses: *Hector Barcia*
[Signature]



Notary: *Patricia G. Martinez*
Patricia G. Martinez
My commission expires 11/7/2019



| | |
|-----------------------------------|--|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 063 398 20206 |
| OWNER 1: | MARTINEZ DANIEL J SR |
| MAILING ADDRESS: | 4429 CARLTON ST NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS | |
| 4429 CARLTON ST NW 87107 | |
| LEGAL DESCRIPTION | |
| - * 020 LOS HERMONOS ADD N1/2 L20 | |

TO: WHOM IT MAY CONCERN/CITY OFFICIALS

FROM: Linda Daisy
4616 Las Hermanas NW - 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

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Signed: _____

2 signature
3 petition

Date: 3/7/16

Witnesses: _____

Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019

TO: WHOM IT MAY CONCERN/CITY OFFICIALS

FROM: Placido Corral
4607 Los Hermanos NW 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

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Signed: _____ (#19 on Petition)

Date: 3/7/16

Witnesses: _____

Notary: Patricia G. Martinez

Patricia G. Martinez

My commission expires 11/7/2019



| | |
|---------------------------------|---|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 025 448 20310 |
| OWNER 1: | CORRAL BENJAMIN |
| MAILING ADDRESS: | 4607 LAS HERMANAS ST NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS | |
| 4607 LAS HERMANAS ST NW 87107 | |
| LEGAL DESCRIPTION | |
| • • 001 LOS HERMONOS S135 FT L1 | |

TO: WHOM IT MAY CONCERN/CITY OFFICIALS

FROM: Richard Fabrizio
4601 Carlton NW 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

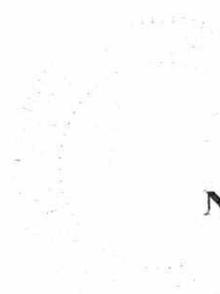
FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC, NOVEMBER 5, 2015.

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Signed: _____ ^{#18}
(petition)
Richard FABRIZIO

Date: 3/7/16

Witnesses: _____



Notary: Patricia D. Martinez
Patricia G. Martinez
My commission expires 11/7/2019



| | |
|--|--|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 075 429 20506 |
| OWNER 1: | SAAVEDRA PAUL & PAULINE % JUAREZ JOSE |
| OWNER 2: | LUIS & JACINDA K |
| MAILING ADDRESS: | 8006 MARROW AVE NE ALBUQUERQUE NM 87110 |
| LOCATION ADDRESS | |
| 4601 CARLTON ST NW 87107 | |
| LEGAL DESCRIPTION | |
| • * 008 LOS HERMANOS ADD L8 EXC N 133.33FT | |

TO: WHOM IT MAY CONCERN/CITY OFFICIALS

FROM: David Garcia
4500 Carlton NW 87107

DATE: February 22, 2016

REGARDING: COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION
AND TO BRING ALL CITY GARBAGE IN VERY CLOSE
PROXIMITY OF OUR PROPERTY

FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC,
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AREA RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAVE
NOT BEEN ALLOWED TO VOTE ON THIS ISSUE AFFECTING
ALL OF US!

Signed: David Garcia

Date: 2/22/16

Witnesses: [Signature]
[Signature]



Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019



| | |
|--|--|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 084 392 20406 |
| OWNER 1: | GARCIA ARLENE & DAVID |
| MAILING ADDRESS: | 4500 CARLTON ST NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS | |
| 4500 CARLTON ST NW 87107 | |
| LEGAL DESCRIPTION | |
| • * 014 LOS HERMONOS ADD S50 FT L14& N1/2 FT L15 | |

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: Richard Martinez
4503 Carlton h w - 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

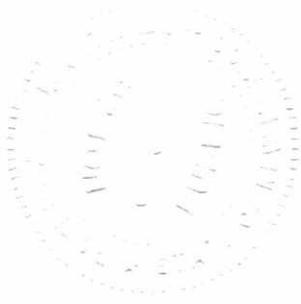
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Signed: Richard Martinez

Date: 2-27-16

Witnesses: [Signature]
[Signature]



Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019



| | |
|---|---|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 064 402 20207 |
| OWNER 1: | MARTINEZ RICHARD CHRISTOPHER & FLORA |
| OWNER 2: | MARY & MUNOZ RUBEN M & ANGELA REINA |
| MAILING ADDRESS: | 4503 CARLTON ST NW ALBUQUERQUE NM 87107 4018 |
| LOCATION ADDRESS 4503 CARLTON ST NW 87107 | |
| LEGAL DESCRIPTION • LOS HERMONOS ADD S1/2 L21 | |

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM:

Herbert Garcia
4512 Carlton NW 87107

DATE: February 22, 2016

REGARDING:

**COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION
AND TO BRING ALL CITY GARBAGE IN VERY CLOSE
PROXIMITY OF OUR PROPERTY**

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SECOND FACILITY OF THIS MAGNITUDE IN THE USA. LOCAL
AREA RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAVE
NOT BEEN ALLOWED TO VOTE ON THIS ISSUE AFFECTING
ALL OF US!**

Signed: Herbert Garcia

Date: 2-22-016

Witnesses: [Signature]
[Signature]



Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019



| | |
|---|---|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 087 399 20407 |
| OWNER 1: | GARCIA HERBERT |
| MAILING ADDRESS: | 4512 CARLTON ST NW ALBUQUERQUE NM 87107 4019 |
| LOCATION ADDRESS 4512 CARLTON ST NW 87107 | |
| LEGAL DESCRIPTION • * 014 LOS HERMONOS ADD N1/2 | |

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**
FROM: Angelo Archuleta / Antonette Archuleta
4623 Las Hermanas NW 87107

DATE: February 22, 2016

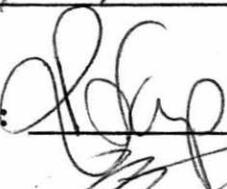
REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE
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AND TO BRING ALL CITY GARBAGE IN VERY CLOSE
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NOT BEEN ALLOWED TO VOTE ON THIS ISSUE AFFECTING
ALL OF US!**

Signed: 

Date: 2/27/16

Witnesses: 




Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019



| | |
|---|---|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 022 454 20332 |
| OWNER 1: | ARCHULETA ANGELO & ARCHULETA BARBARA L |
| MAILING ADDRESS: | 4623 LAS HERMANAS ST NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS | |
| 4623 LAS HERMANAS NW 87107 | |
| LEGAL DESCRIPTION | |
| <ul style="list-style-type: none">• LT 1-D A PLAT OF LTS 1-A, 1-B, 1-C & 1-D OF LOS HERMANOS ADD• N CONT 0.2205 AC M/L OR 9,605 SF M/L | |

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: Derwin Cupp

4631 Las Hermanas NW 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC, NOVEMBER 5, 2015.

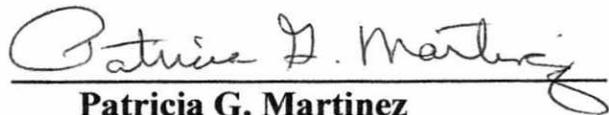
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Signed: 

Date: 2/27/2016

Witnesses: 




Notary: 
Patricia G. Martinez
My commission expires 11/7/2019



| | |
|--|---|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 023 479 20313 |
| OWNER 1: | CUPP DERWIN |
| MAILING ADDRESS: | 4631 LAS HERMANAS ST NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS 4631 LAS HERMANAS ST NW 87107 | |
| LEGAL DESCRIPTION <ul style="list-style-type: none">• LT 1-A A PLAT OF LTS 1-A, 1-B, 1-C & 1-D OF LOS HERMANOS ADD• N CONT 0.1674 AC M/L OR 7,292 SF M/L | |

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: DAVID S MARTINEZ SR.
4429 Carlton NW 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION
AND TO BRING ALL CITY GARBAGE IN VERY CLOSE
PROXIMITY OF OUR PROPERTY**

**FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC,
NOVEMBER 5, 2015.**

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ALL OF US!**

Signed: *David S. Martinez*

Date: 2-22-16

Witnesses: *Hobert Barcia*
[Signature]



Notary: *Patricia G. Martinez*
Patricia G. Martinez
My commission expires 11/7/2019

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: Vince Martinez

4429 Carlton N.W. 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

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Signed: Vince Martinez

Date: 2 - 22 - 16

Witnesses: Alber Garcia
[Signature]

Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019





| | |
|---|--|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 063 398 20206 |
| OWNER 1: | MARTINEZ DANIEL J SR |
| MAILING ADDRESS: | 4429 CARLTON ST NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS 4429 CARLTON ST NW 87107 | |
| LEGAL DESCRIPTION • * 020 LOS HERMONOS ADD N1/2 L20 | |

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: Deborah Spansel
132 Ariegos Rd NW 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION
AND TO BRING ALL CITY GARBAGE IN VERY CLOSE
PROXIMITY OF OUR PROPERTY**

**FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC,
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AREA RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAVE
NOT BEEN ALLOWED TO VOTE ON THIS ISSUE AFFECTING
ALL OF US!**

Signed: Deborah Spansel

Date: 2/22/2016

Witnesses: [Signature]
[Signature]



Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019



| | |
|---|---|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 015 060 067 466 20511 |
| OWNER 1: | JOLLEY LESLIE J & DEBORA L |
| MAILING ADDRESS: | 128 GRIEGOS RD NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS | |
| 132 GRIEGOS RD NW 87107 | |
| LEGAL DESCRIPTION | |
| <ul style="list-style-type: none">• LOT 3-A PLAT OF LOTS 3-A & 3-B LOS HERMANOS ADD'N• CONT .3422 AC• | |



TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

FROM: Margaret R. Miller
848 Palo Duro NW 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION
AND TO BRING ALL CITY GARBAGE IN VERY CLOSE
PROXIMITY OF OUR PROPERTY**

**FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC,
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SECOND FACILITY OF THIS MAGNITUDE IN THE USA. LOCAL
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NOT BEEN ALLOWED TO VOTE ON THIS ISSUE AFFECTING
ALL OF US!**

Signed: Margaret R. Miller

Date: 2-22-16

Witnesses: [Signature]
[Signature]



Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019



| | |
|------------------------------|---|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 014 061 258 071 30636 |
| OWNER 1: | RUSSELL-MILLER MARGARET J |
| MAILING ADDRESS: | 848 PALO DURO AVE NW ALBUQUERQUE NM 87107 3837 |
| LOCATION ADDRESS | |
| 848 PALO DURO AV NW 87107 | |
| LEGAL DESCRIPTION | |
| • * 037 002SANDIA PLAZA SUBD | |

TO: **WHOM IT MAY CONCERN/CITY OFFICIALS**

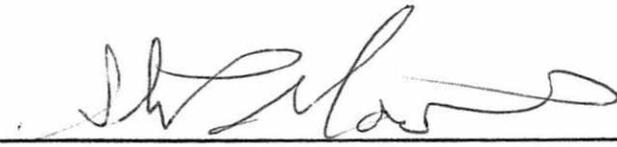
FROM: Albert Martinez
4441 3rd NW

DATE: February 22, 2016

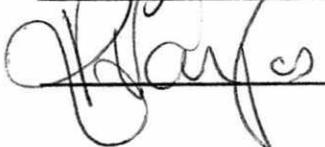
REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE
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**FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC,
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AREA RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAVE
NOT BEEN ALLOWED TO VOTE ON THIS ISSUE AFFECTING
ALL OF US!**

Signed: 

Date: 2-27-16

Witnesses: Margaret Miller


Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019





| | |
|--------------------------|--|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 014 060 433 393 11502 |
| OWNER 1: | BUCKLEY FERN L & LISA B MARTINEZ & |
| OWNER 2: | ALBERT G MARTINEZ |
| MAILING ADDRESS: | 4441 3RD ST NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS | |
| 4441 3RD ST NW 87107 | |
| LEGAL DESCRIPTION | |
| - * 012 001GARDNER ADD | |

TO: WHOM IT MAY CONCERN/CITY OFFICIALS

FROM: GREG MARTINEZ

4441 - 3rd NW - 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

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Signed: *Greg Martinez*

Date: 2-22-16

Witnesses: *Margaret Melby*
[Signature]

Notary: *Patricia G. Martinez*
Patricia G. Martinez
My commission expires 11/7/2019





| | |
|--|--|
| OWNERSHIP DATA | |
| PARCEL ID: | 1 014 060 433 393 11502 |
| OWNER 1: | BUCKLEY FERN L & LISA B MARTINEZ & |
| OWNER 2: | ALBERT G MARTINEZ |
| MAILING ADDRESS: | 4441 3RD ST NW ALBUQUERQUE NM 87107 |
| LOCATION ADDRESS 4441 3RD ST NW 87107 | |
| LEGAL DESCRIPTION • * 012 001GARDNER ADD | |

FROM:

Andres SALAZAR &

Rose M. SALAZAR

Property Owner(S)

DATE:

November 14, 2015

REGARDING:

**COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMMANCHE WASTE TRANSFER STATION IN VERY
CLOSE PROXIMITY OF OUR PROPERTY**

**FOR ALL THE REASONS AS RECORDED AT THE
HEARING/EPC, NOVEMBER 5, 2015**

ENCLOSED/ PROPERTY INFORMATION IN CLOSE
PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF
ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND
FACILITY OF THIS MAGNITUDE IN THE USA.....LOCAL AREA
RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAS NOT VOTED
FOR THIS
TRAVESTY

Signed:

Andres Salazar

Rose M. Salazar

Date:

11/16/2015

Witnesses:

[Signature]

[Signature]

Notary

Patricia G. Martinez

Patricia G. Martinez

My Commission expires 11/7/2019

*Signed before me
this 16th day of Nov. 2015*

| | | | | | | |
|--|--|--|--|--|--|--|
| | | | | | | |
|--|--|--|--|--|--|--|

PARCEL NUMBER
1 015 060 082 448 20508

PROPERTY ADDRESS AND DESCRIPTION 4611 CARLTON ST NW
 * 005 LOS HERMONOS ADD S1/2 L5

AFC MRGB



T59 P1 11 RP RN: 262 SN: 513618
 SALAZAR ANDRES & ROSE M
 4611 CARLTON ST NW
 ALBUQUERQUE NM 87107-4020

A1AM

◀ TAX DISTRICT

R

PROPERTY CLASSIFICATIONS
 R = RESIDENTIAL
 N = NON-RESIDENTIAL

SENT TO # 08501251
RANK OF AMERICA

Please read taxpayer's remedies and remedies available to the taxing authorities on back

2015 TAX BILL
MANNY ORTIZ
TREASURER
BERNALILLO COUNTY
 ONE CIVIC PLAZA NW, BASEMENT
 ALBUQUERQUE, NM 87102
 (505) 468-7031
<http://www.bernco.gov/treasurer>

FROM:

Danny Robert Trujillo

Property Owner(S)

DATE:

November 14, 2015

REGARDING:

**COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMMANCHE WASTE TRANSFER STATION IN VERY
CLOSE PROXIMITY OF OUR PROPERTY**

**FOR ALL THE REASONS AS RECORDED AT THE
HEARING/EPC, NOVEMBER 5, 2015**

ENCLOSED/ PROPERTY INFORMATION IN CLOSE
PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF
ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND
FACILITY OF THIS MAGNITUDE IN THE USA....LOCAL AREA
RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAS NOT VOTED
FOR THIS
TRAVESTY 125 Arizozas NW - 87107

Signed:

Daniel R. Trujillo

Date:

11-14-15

Witnesses:

Michael Thomas
[Signature]

Notary

Patricia G. Martinez

Patricia G. Martinez

My Commission expires 11/7/2019

Signed this
14th day of
Nov. 2015.

Profile
Values
Map

PARID: 101506006548820706
TRUJILLO ROBERT D & LUCINDA A,

125 GRIEGOS RD

1 of 1

Return to Search Results
Tax Year [2015 ▼]

Class

Class Residential

Ownership

Tax Year 2015
Owner Name TRUJILLO ROBERT D & LUCINDA A
Owner Mailing Address 125 GRIEGOS RD NW
Unit
City ALBUQUERQUE
State NM
Zip Code 87107 4024
Foreign Mailing Address

Actions

Printable Summary
Printable Version

Reports

Property Attributes

Go

Description

Location Address 125 GRIEGOS RD NW
City ALBUQUERQUE
State NM
Zip Code 87107
Property Description LOT 25 EXCEPT A PORTION TO R/W GRIEGOS ROAD
NW PLEASANT ACRE
S ADDITION

Public Improvement District
Tax Increment Development Districts

Attributes

Primary Building SQ FT 1420
Year Built 1942
Lot Size (Acres) .4

Document #

Document #: 8453453 062184 000000

FROM: Michael R. Thornton

Property Owner(S)

DATE: November 14, 2015

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMMANCHE WASTE TRANSFER STATION IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC, NOVEMBER 5, 2015

ENCLOSED/ PROPERTY INFORMATION IN CLOSE PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND FACILITY OF THIS MAGNITUDE IN THE USA.....LOCAL AREA RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAS NOT VOTED FOR THIS TRAVESTY 115 Arizos NW - 87107

Signed: Michael Thornton

Date: 11-15-15

Witnesses: [Signature]
[Signature]

Notary Patricia G. Martinez
Patricia G. Martinez

My Commission expires 11/7/2019

Signed this
15th Day of
Nov. 2015.



PROPERTY ADDRESS AND DESCRIPTION PARCEL
 115 GRIEGOS RD NW
 * 24 EXC POR TO R/W GRIEGOS RD NW
 PLEASANT ACRES ADDN

2015

PARCEL NUMBER: 101506007548220708



TREASURER BERNALILLO
 COUNTY
 PO BOX 627
 ALBUQUERQUE, N.M. 87103-0627
 (505) 468-7031
 TREASURERS OFFICE
 E-MAIL: TREAS@BERNCO.GOV

2015 TAX BILL

THIS TAX BILL IS THE
ONLY NOTICE YOU WILL
 RECEIVE FOR PAYMENT
 OF BOTH INSTALLMENTS
 OF YEAR 2015
 PROPERTY TAX

AFC MRGB

1 015 060 075 482 20708
 THORNTON MICHAEL RAY
 115 GRIEGOS RD NW
 ALBUQUERQUE NM 87107

A1AM TAX DISTRICT

| PROPERTY | CODE | VALUE | AGENCIES | TAX RATE | NET TAXABLE VALUE | AMOUNT DUE |
|-----------------------------|-------------|--------|-------------------|---------------|--------------------------|-----------------|
| ASSESSED VALUE LAND | | 46,837 | STATE | 1.360 | 30,787 | 41.87 |
| ASSESSED VALUE IMPROVEMENTS | | 51,533 | COUNTY | 8.721 | 30,787 | 268.50 |
| ASSESSED VALUE PERS PROP | | 0 | ALBUQ | 11.469 | 30,787 | 353.10 |
| TAXABLE VALUE LAND | | 15,611 | SCHOOL APS | 10.531 | 30,787 | 324.22 |
| TAXABLE VALUE IMPROVEMENTS | | 17,176 | CNM | 3.381 | 30,787 | 104.09 |
| TAXABLE VALUE PERS PROP | | 0 | UNMH | 6.334 | 30,787 | 195.01 |
| TOTAL VALUATION | | 32,787 | AMAFCA | 0.852 | 30,787 | 26.23 |
| STATUTORY EXEMPTION | | 2,000 | MRGCD | 4.379 | 30,787 | 134.82 |
| VETERAN EXEMPTION | | 0 | | | | |
| NET TAXABLE VALUE | HOHX | 30,787 | TOTAL RATE | 47.027 | 2015 TAX >> | 1,447.84 |

1st half payment becomes delinquent after Dec 10, 2015

FROM:

Andrew Martinez

Property Owner(S)

DATE:

November 14, 2015

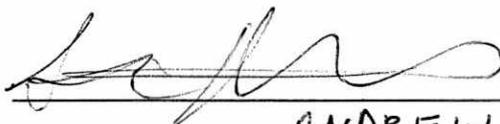
REGARDING:

**COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMMANCHE WASTE TRANSFER STATION IN VERY
CLOSE PROXIMITY OF OUR PROPERTY**

**FOR ALL THE REASONS AS RECORDED AT THE
HEARING/EPC, NOVEMBER 5, 2015**

ENCLOSED/ PROPERTY INFORMATION IN CLOSE
PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF
ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND
FACILITY OF THIS MAGNITUDE IN THE USA.....LOCAL AREA
RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAS NOT VOTED
FOR THIS
TRAVESTY - 4607- Carlton NW - 87107

Signed:



ANDREW MARTINEZ

Date:

11-14-15

Witnesses:

Nicholas J. Martinez


Notary

Patricia G. Martinez

Patricia G. Martinez

My Commission expires 11/7/2019

Signed this 14th
day of Nov, 2015.



PROPERTY ADDRESS AND DESCRIPTION PARCEL
 4607 CARLTON ST NW
 LT 8-B PLAT OF LOTS 8-A & 8-B LOS HERMANOS
 ADDITION
 CONT .1936 AC

2015

PARCEL NUMBER: 101506007843320507



TREASURER BERNALILLO
 COUNTY
 PO BOX 627
 ALBUQUERQUE, N.M. 87103-
 0627
 (505) 468-7031
 TREASURERS OFFICE
 E-MAIL: TREAS@BERNCO.GOV

2015 TAX BILL

THIS TAX BILL IS THE
ONLY NOTICE YOU WILL
 RECEIVE FOR PAYMENT
 OF BOTH INSTALLMENTS
 OF YEAR 2015
 PROPERTY TAX

AFC MRGB

1 015 060 078 433 20507
 SKENDER ANTONIO
 3324 19TH AVE SE
 RIO RANCHO NM 87124

A1AM TAX DISTRICT

| PROPERTY | CODE | VALUE | AGENCIES | TAX RATE | NET TAXABLE VALUE | AMOUNT DUE |
|-----------------------------|------|--------|-------------------|---------------|--------------------------|-----------------|
| ASSESSED VALUE LAND | | 29,159 | STATE | 1.360 | 26,066 | 35.45 |
| ASSESSED VALUE IMPROVEMENTS | | 49,047 | COUNTY | 8.721 | 26,066 | 227.32 |
| ASSESSED VALUE PERS PROP | | 0 | ALBUQ | 11.469 | 26,066 | 298.94 |
| TAXABLE VALUE LAND | | 9,719 | SCHOOL APS | 10.531 | 26,066 | 274.50 |
| TAXABLE VALUE IMPROVEMENTS | | 16,347 | CNM | 3.381 | 26,066 | 88.13 |
| TAXABLE VALUE PERS PROP | | 0 | UNMH | 6.334 | 26,066 | 165.10 |
| TOTAL VALUATION | | 26,066 | AMAFCA | 0.852 | 26,066 | 22.21 |
| STATUTORY EXEMPTION | | 0 | MRGCD | 4.379 | 26,066 | 114.13 |
| VETERAN EXEMPTION | | 0 | | | | |
| NET TAXABLE VALUE | | 26,066 | TOTAL RATE | 47.027 | 2015 TAX >> | 1,225.78 |

1st half payment becomes delinquent after Dec 10, 2015
 2nd half payment becomes delinquent after May 10, 2016

FROM:

JOSE LUIS JUAREZ

JACINDA K. JUAREZ

Property Owner(S)

DATE:

November 14, 2015

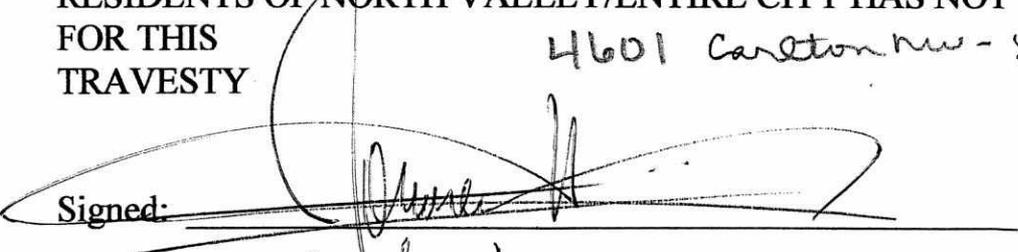
REGARDING:

**COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMMANCHE WASTE TRANSFER STATION IN VERY
CLOSE PROXIMITY OF OUR PROPERTY**

**FOR ALL THE REASONS AS RECORDED AT THE
HEARING/EPC, NOVEMBER 5, 2015**

ENCLOSED/ PROPERTY INFORMATION IN CLOSE
PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF
ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND
FACILITY OF THIS MAGNITUDE IN THE USA.....LOCAL AREA
RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAS NOT VOTED
FOR THIS TRAVESTY

4601 Carleton NW - 87107

Signed: 

Date: 11-14-15

Witnesses: Nicholas J. Martinez
Ray

Notary Patricia G. Martinez

Patricia G. Martinez

My Commission expires 11/7/2019

Signed this
14th day of Nov. 2015,



| | | |
|---|---|-----------------------|
| JURISDICT: 02 PARCEL ID: 1 015 060 075 429 20506 | | TAX YEAR: 2015 |
| ROLLTYPE: RP PROTEST DEADLINE: 01-MAY-15 | | |
| TAX DISTRICT A1 MRG: M AFC: A CLASS: RES | | |
| OWNER 1: SAAVEDRA PAUL & PAULINE % JUAREZ JOSE OWNER 2: LUIS & JACINDA K ADDRESS: 8006 MARROW AVE NE ALBUQUERQUE NM 87110 LOCATION: 4601 CARLTON ST NW DOCUMENT #: 2015011675 020515 RC- ENTRY BY ALM 030215 CODED BY LV 021215 | FULL LAND VALUE: 20,203 AGRIC. LAND: 0 FULL IMPV. VALUE: 59,517 TOTAL FULL VALUE: 79,720 TAXABLE (1/3 FULL): 26,571 EXEMPTIONS HEAD OF FAMILY: 2,000 VETERAN: 0 OTHER (): 0 NET TAXABLE VALUE: 24,571 | |
| PROPERTY DESCRIPTION LEGAL • * 008 LOS HERMANOS ADD L8 EXC N 133.33FT | | |
| COMMENTS | | |

FROM:

Julian Archuleta

Julian Archuleta

Property Owner(S)

DATE:

November 14, 2015

REGARDING:

COMPLETE AND TOTAL OPPOSITION TO THE *zone change/*
EDITH/COMMANCHE WASTE TRANSFER STATION IN VERY
CLOSE PROXIMITY OF OUR PROPERTY

FOR ALL THE REASONS AS RECORDED AT THE
HEARING/EPC, NOVEMBER 5, 2015

ENCLOSED/ PROPERTY INFORMATION IN CLOSE
PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF
ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND
FACILITY OF THIS MAGNITUDE IN THE USA.....LOCAL AREA
RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAS NOT VOTED
FOR THIS
TRAVESTY.

*010 Los Hermanos ADD. N 45.5 ft S50
46 18 Canton NW ALBUQ. NM 8710
87107*

Signed:

Julian E. Archuleta

Date:

11-14-15

Witnesses:

Nicholas J. Martinez

[Signature]

Notary

Patricia G. Martinez
Patricia G. Martinez

My Commission expires 11/7/2019

*Signed this 14th
day of Nov. 2015.*

2015

NOTICE OF VALUE

**THIS VALUE WILL BE A FACTOR
IN DETERMINING YOUR 2015
PROPERTY TAX BILL**

THIS IS NOT A TAX BILL

Property Listed and Valued as of January 1, 2015



**TANYA R. GIDDINGS
BERNALILLO COUNTY ASSESSOR**

P.O. BOX 27108
ALBUQUERQUE, NEW MEXICO 87125
(505) 222-3700 www.bernco.gov

THIS IS THE ONLY NOTICE OF VALUE YOU WILL RECEIVE UNLESS YOU ARE THE OWNER OF PERSONAL PROPERTY OR TAXABLE LIVESTOCK.
INSTRUCTIONS FOR PROTESTING AND FILING OF EXEMPTIONS ARE ON THE REVERSE SIDE.
FOR ASSISTANCE CALL (505) 222-3700, BETWEEN THE HOURS OF 8:00 AM - 5:00 PM MONDAY- FRIDAY.

SITUS: 4618 CARLTON ST NW

UPC# 101506009843320413
48325*104**50***0.574**1/1*****AUTO**5-DIGIT 87107
ARCHULETA J ETUX
4618 CARLTON ST NW
ALBUQUERQUE NM 87107-4021



Mailing Date
April 1, 2015

Protest Deadline Date
May 01, 2015

Tax District
A1AM

REAL PROPERTY: IF ANY CHANGES HAVE OCCURRED, PLEASE FILL OUT THE INFORMATION ON THE REVERSE SIDE OF THIS FORM AND RETURN IT TO THE BERNALILLO COUNTY ASSESSOR AT THE ABOVE ADDRESS.

IF THERE ARE ANY CHANGES, detach here and return top portion

| PROPERTY DESCRIPTION |
|--|
| <u>Legal</u> * 010 LOS HERMONOS ADD N45.5 FT S50 FT L10 |
| <u>Property Address</u> 4618 CARLTON ST. NW ALBUQUERQUE NM 87107 DOC# |

| VALUE RECAP | FULL VALUE | TAXABLE VALUE |
|-------------------|------------|---------------|
| LAND | 16,743 | 5,580 |
| Agric. land | 0 | 0 |
| STRUCTURES | 40,969 | 13,655 |
| TOTAL VALUE | 57,712 | 19,235 |
| VETERAN EXEMPTION | | 4,000 |
| FAMILY EXEMPTION | | 2,000 |
| OTHER EXEMPTION | | 0 |
| NET TAXABLE VALUE | | 13,235 |

"FULL VALUE" MEANS THE VALUE DETERMINED FOR PROPERTY TAXATION PURPOSES.
"TAXABLE VALUE" IS 33 1/3% OF THE "FULL VALUE"
"NET TAXABLE VALUE" IS "TAXABLE VALUE" LESS EXEMPTIONS AND IS THE VALUE UPON WHICH TAX IS IMPOSED.

THIS DOCUMENT CONSTITUTES A PROPERTY OWNER'S NOTICE OF VALUATION AS REQUIRED UNDER SECTION 7-38-20 OF THE NEW MEXICO PROPERTY TAX CODE.



**TANYA R. GIDDINGS
BERNALILLO COUNTY ASSESSOR**

P.O. BOX 27108
ALBUQUERQUE, NEW MEXICO 87125
(505) 222-3700 www.bernco.gov

2015 NOTICE OF VALUE

Please examine this notice carefully!

CLASS **RES** TD **A1AM**

NET TAXABLE VALUES WILL BE ALLOCATED TO THE GOVERNMENTAL UNITS IN THE TAX DISTRICT

AGENCIES

State, County, Albuquerque, School APS, CNM, UNMH, AMAFC, MRGCD

ALWAYS USE UPC# AS REFERENCE

UPC# 101506009843320413
ARCHULETA J ETUX
4618 CARLTON ST NW
ALBUQUERQUE NM 87107-4021

COMMENT: TO QUALIFY FOR A VALUE FREEZE, VETERAN OR HEAD OF FAMILY EXEMPTION, PLEASE READ THE GENERAL INSTRUCTIONS.

Previous Years Taxable Value \$12,675.00 Previous Years Tax Rate (per thousand) 46.633
Previous Years Tax \$591.04

Due to current mil rate setting which occurs every year the calculation of property tax may be higher or lower than the property tax that will actually be imposed.

Estimated tax calculation per NMSA 7-38-20; To estimate taxes based on the previous year's rate multiply the net taxable value on this notice by the previous year's rate and divide by 1000. Example: (\$100,000 X 41.074/1000 = \$4,107.40)

PROTEST DEADLINE: **May 01, 2015** Instructions for appealing, filing of exemptions or completing changes to this form are on the reverse side. For assistance call the number listed above, between the hours of 8:00 and 5:00, Monday through Friday.

PLEASE RETAIN THIS PORTION FOR YOUR RECORDS



FROM:

Maryann Gonzalez
Maryann Gonzalez Ex.
Joe Valdez
Property Owner(S)

Joe Valdez et al.

DATE:

November 14, 2015

REGARDING:

**COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMMANCHE WASTE TRANSFER STATION IN VERY
CLOSE PROXIMITY OF OUR PROPERTY**

**FOR ALL THE REASONS AS RECORDED AT THE
HEARING/EPC, NOVEMBER 5, 2015**

ENCLOSED/ PROPERTY INFORMATION IN CLOSE
PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF
ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND
FACILITY OF THIS MAGNITUDE IN THE USA....LOCAL AREA
RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAS NOT VOTED
FOR THIS
TRAVESTY

4602 Carlton NW - 2 Res. lots

Signed:

Maryann Gonzalez

Date:

11-14-15

Witnesses:

Nicholas J. Martinez
[Signature]

Notary

Patricia G. Martinez
Patricia G. Martinez

My Commission expires 11/7/2019

Signed this 14th
Day of Nov. 2015.



| | | |
|---|---|----------------|
| JURISDICT: 02 PARCEL ID: 1 015 060 093 416 20410 | | TAX YEAR: 2015 |
| ROLLTYPE: RP PROTEST DEADLINE: 01-MAY-15 | | |
| TAX DISTRICT A1 MRG: M AFC: A CLASS: RES | | |
| OWNER 1: VALDEZ JOE WALDO ETUX ADDRESS: 4602 CARLTON ST NW ALBUQUERQUE NM 87107-4021 LOCATION: 4602 CARLTON ST NW DOCUMENT #: | FULL LAND VALUE: 23,939 AGRIC. LAND: 0 FULL IMPV. VALUE: 93,737 TOTAL FULL VALUE: 117,676 TAXABLE (1/3 FULL): 39,222 EXEMPTIONS HEAD OF FAMILY: 2,000 VETERAN: 0 OTHER (): 0 NET TAXABLE VALUE: 37,222 | |
| PROPERTY DESCRIPTION LEGAL - * 012 LOS HERMONOS ADD | | |
| COMMENTS | | |

TO: WHOM IT MAY CONCERN/CITY OFFICIALS

FROM: Bernice Gabaldon

Property Owner(S)

DATE: November 15, 2015

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMMANCHE WASTE TRANSFER STATION IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC, NOVEMBER 5, 2015

ENCLOSED/ PROPERTY INFORMATION IN CLOSE PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND FACILITY OF THIS MAGNITUDE IN THE USA.....LOCAL AREA RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAS NOT VOTED FOR THIS TRAVESTY *115 TYRONE NW*

Signed: Bernice Gabaldon
Gabaldon

Date: 11-17-15

Witnesses: [Signature]
[Signature]

Notary Patricia G. Martinez
Patricia G. Martinez

My Commission expires 11/7/2019

Signed before me 11/17/15.

Profile
Values
Map

PARID: 101506008651521009
GABALDON HENRY & BERNICE,

115 TYRONE AV

1 of 1

[Return to Search Results](#)
Tax Year

Class

Class Residential

Ownership

Tax Year 2015
Owner Name GABALDON HENRY & BERNICE
Owner Mailing Address 115 TYRONE NW
Unit
City ALBUQUERQUE
State NM
Zip Code 87107
Foreign Mailing Address

Actions

[Printable Summary](#)
 [Printable Version](#)

Reports

[Property Attributes](#)

Go

Report complete.
[Click to open](#)

Description

Location Address 115 TYRONE AV NW
City ALBUQUERQUE
State NM
Zip Code 87107
Property Description * 048 PLEASANT ACRES ADD

Public Improvement District
Tax Increment Development Districts

Attributes

Primary Building SQ FT 2123
Year Built 1956
Lot Size (Acres) .23

Document #

Document #: 2006123494 061406 WD - ENTRY BY CRP 091106
CODED BY EG 082806

TO: WHOM IT MAY CONCERN/CITY OFFICIALS

FROM: Sylvia & Raphael E. Sandoval

Property Owner(S)

DATE: November 15, 2015

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE
EDITH/COMMANCHE WASTE TRANSFER STATION IN VERY
CLOSE PROXIMITY OF OUR PROPERTY**

**FOR ALL THE REASONS AS RECORDED AT THE
HEARING/EPC, NOVEMBER 5, 2015**

ENCLOSED/ PROPERTY INFORMATION IN CLOSE
PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF
ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND
FACILITY OF THIS MAGNITUDE IN THE USA.....LOCAL AREA
RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAS NOT VOTED
FOR THIS
TRAVESTY 103 Griegos Rd NW

Signed: Sylvia Sandoval
Raphael E & Sylvia

Date: 11/17/15

Witnesses: [Signature]
[Signature]

Notary Patricia D. Martinez
Patricia G. Martinez

My Commission expires 11/7/2019

Signed before me
11/17/15.

Profile
Values
Map

PARID: 101506009047820709
SANDOVAL R E ETUX,

103 GRIEGOS RD

1 of 1

Return to Search Results
Tax Year 2015

Class

Class Residential

Ownership

Tax Year 2015
Owner Name SANDOVAL R E ETUX
Owner Mailing Address 103 GRIEGOS RD NW
Unit
City ALBUQUERQUE
State NM
Zip Code 87107
Foreign Mailing Address

Actions

 Printable Summary
 Printable Version

Reports

Property Attributes

Go

Description

Location Address 103 GRIEGOS RD NW
City ALBUQUERQUE
State NM
Zip Code 87107
Property Description LOT 22-A EXCEPT A PORTION TO R/W GRIEGOS ROAD
NW PLEASANT AC
RES REPLAT

Public Improvement District
Tax Increment Development Districts

Attributes

Primary Building SQ FT 2148
Year Built 1954
Lot Size (Acres) .3

Document #

Document #:

TO: WHOM IT MAY CONCERN/CITY OFFICIALS

FROM: Henry Crabtree
4627 Las Hermanas NW 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC, NOVEMBER 5, 2015.

ENCLOSED PROPERTY INFORMATION IS IN CLOSE PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND FACILITY OF THIS MAGNITUDE IN THE USA. LOCAL AREA RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAVE NOT BEEN ALLOWED TO VOTE ON THIS ISSUE AFFECTING ALL OF US!

Signed: _____ ^{#1}
(on Petition)

Date: 3/7/16

Witnesses: _____

Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019



Profile
Values
Map

PARID: 101506002347120312
MITCHELL LEAH J & CREAM PATRICIA J,

4627 LAS HERMANAS ST

1 of 1

Return to Search Results
Tax Year [2015 ▼]

Class

Class Residential

Ownership

Tax Year 2015
Owner Name MITCHELL LEAH J & CREAM PATRICIA J
Owner Mailing Address 2549 CAMPBELL RD NW
Unit
City ALBUQUERQUE
State NM
Zip Code 87104
Foreign Mailing Address

Actions

Printable Summary
Printable Version

Reports

Property Attributes

Go

Description

Location Address 4627 LAS HERMANAS ST NW
City ALBUQUERQUE
State NM
Zip Code 87107
Property Description LT 1-B A PLAT OF LTS 1-A, 1-B, 1-C & 1-D OF LOS HERMANOS ADD
N CONT 0.1674 AC M/L OR 7,292 SF M/L

Public Improvement District
Tax Increment Development Districts

Attributes

Primary Building SQ FT 1901
Year Built 2006
Lot Size (Acres) .1674

Document #

Document #: 2007043324 032007 WD - ENTRY BY LT 042407 CODED BY DV/RS 032707

TO: WHOM IT MAY CONCERN/CITY OFFICIALS

FROM: MARIAN PAVIONI
4404 Edith NE 87107

DATE: February 22, 2016

REGARDING: **COMPLETE AND TOTAL OPPOSITION TO THE EDITH/COMANCHE WASTE TRANSFER STATION'S EXPANSION AND TO BRING ALL CITY GARBAGE IN VERY CLOSE PROXIMITY OF OUR PROPERTY**

FOR ALL THE REASONS AS RECORDED AT THE HEARING/EPC, NOVEMBER 5, 2015.

ENCLOSED PROPERTY INFORMATION IS IN CLOSE PROXIMITY TO PROPOSED ZONE CHANGE(S) AND INTENT OF ALBUQUERQUE CITY GOVERNMENT TO CONSTRUCT SECOND FACILITY OF THIS MAGNITUDE IN THE USA. LOCAL AREA RESIDENTS OF NORTH VALLEY/ENTIRE CITY HAVE NOT BEEN ALLOWED TO VOTE ON THIS ISSUE AFFECTING ALL OF US!

Signed: Marian Pavioni

Date: 3/12/16

Witnesses: J. Martinez

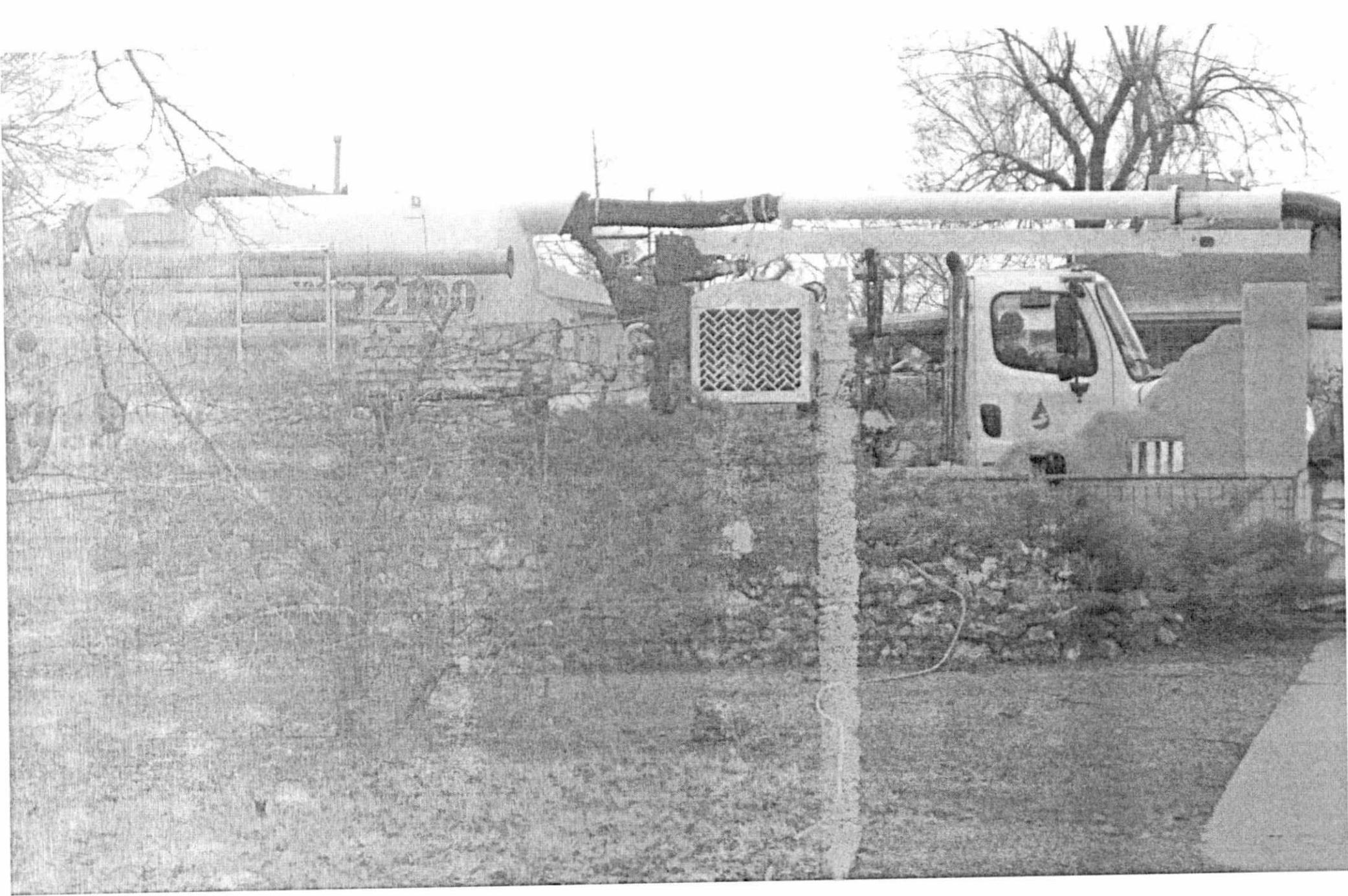
Notary: Patricia G. Martinez
Patricia G. Martinez
My commission expires 11/7/2019

Gould, Maggie S.

From: Jamelle Morgan <jami@zialink.org>
Sent: Tuesday, January 03, 2017 9:02 AM
To: Gould, Maggie S.
Subject: 8:45 AM...
Attachments: IMG_20170103_0851142_rewind.jpg

Moments after I sent my last email to you my home was shaking... looked out and saw this! Imagine trucks this size cutting thru San Lorenzo on a regular basis because they do!!

Sent from my Fire Phone



Gould, Maggie S.

From: Janice <janmaccou@comcast.net>
Sent: Tuesday, January 03, 2017 8:59 AM
To: Gould, Maggie S.
Subject: North Edith Letter

NORTH EDITH CORRIDOR ASSOCIATION

President- Bob Warrick 345-1773

Vice-President-Christine Benavidez 897-3340

Secretary-Evelyn Harris 379-3693

January 3, 2017

Planning Department
600 Second Street
Albuquerque, NM 87102

Ms. Maggie Gould @ mgouldcabq.gov
Karen Hudson

Re: Project # 1010582, Transfer Station

Our association members have reviewed information for the transfer station at Edith and Comanche at many of our monthly meetings and each time we have agreed that this is not an appropriate location due to the many residence in the area. This is defiantly an environmental issue/problem. The county residence should not be exposed to this situation right out their back door; their way of life would change drastically.

Please take our comments into consideration when making your decision.

Bob Warrick-President



January 2, 2017

Ms. Maggie Gould
c/o City of Albuquerque Planning Department
600 2nd St NW, 3rd Floor,
Albuquerque, NM 87102

Re: Proposed Edith Waste Transfer Station Project # 1010582

Members of the Environmental Planning Commission:

Greetings! My name is James Aranda. I am the Director of Health Matters New Mexico, a community-based organization that advocates for sound land-use, environmental, and social policies that provide equal opportunities for safe, clean and healthy neighborhoods and resolve the disproportionate environmental burdens on New Mexico's people of color, working poor, low-income and vulnerable communities.

We at Health Matters NM stand in support of our friends and neighbors in the North Valley who have serious concerns with the City of Albuquerque's proposed Waste Transfer Station (WTS) at its current Edith and Comanche Solid Waste facility. According to the application, the proposed facility will receive all of Albuquerque's daily collected garbage and transfer it to the Cerro Colorado landfill via 18-wheel truck, creating an additional 229 round trips—a 179% increase—into and out of the proposed waste transfer station each weekday. This does not include privately owned vehicles that will be self-hauling trash to the proposed WTS's convenience center.

The City of Albuquerque claims the proposed WTS will improve the surrounding neighborhood by providing benefits such as reductions in air pollution, nonetheless, the applicant has not provided any air quality data to substantiate this claim. Furthermore, the application—with the exception of a preliminary Traffic Impact Study—primarily focuses on site details and fails to consider anything outside of the site boundaries, including the potential health impacts that might harm residents living in neighborhoods close to the site, should the proposed WTS be approved.

In August 2015, a Health Impact Assessment (HIA) was conducted on the proposed Edith transfer station to assess the impacts of the proposed waste transfer station on the health of residents and others who live, work, attend school, or play in neighborhoods that are located near the site. The HIA Committee concluded that the proposed transfer station may pose a threat to the health, safety and welfare of community members living in adjacent neighborhoods. The Committee also found that the request is in conflict with City of Albuquerque Zoning Code Enactment 270-1980, and that it should not be built at the proposed site. Environmental and health data assessed for the HIA indicate that area residents bear a disproportionate environmental and health burden. This burden in conjunction with the community's



socio-economic and demographic composition make the impacted community meet the U.S. Environmental Protection Agency's (EPA) criteria for an environmental justice neighborhood.

In spite of the many potential impacts of the proposed waste transfer station, what is perhaps of graver concern to neighborhood residents is the way in which the City failed to involve those who will be most impacted by this project, and made an internal decision to locate the proposed waste transfer station at the site of their current facility. The fact that residents of adjacent neighborhoods learned about the proposed waste transfer station through an Op Ed in the Albuquerque Journal—and not the City of Albuquerque—is not only an affront, but further evidence of the lack of regard our local government agencies have for EPA guidelines to involve impacted residents in the development of WTS site criteria and the site selection processes.

The City of Albuquerque's actions throughout this process have only lent credence to the community's perception that that COA is imposing an ill-conceived project on their neighborhoods without the community's consent or input—all in the name of convenience. Community members can and should be engaged in the decisions that impact their neighborhoods. Only through open dialogue and a sincere willingness to work together can a relationship based on mutual trust and respect be built. Because the City is an applicant in this case, community members and those most impacted by the City's decision believe it is only right that that the City address their concerns and answer questions in an honest, transparent, and timely manner. As Health Matters New Mexico joins our friends and neighbors in the North Valley to once again demand a seat at the table, I urge you to side with those who are most impacted by the proposal and make the right decision regarding the proposed Edith Waste Transfer Station.

Respectfully,

James M. Aranda
Director,
Health Matters New Mexico

January 2, 2017

RE: Edith Transfer Station: Project #1010582

ATTN.:

Karen Hudson, Chair
C/O Maggie Gould, Planner
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

Dear Karen Hudson, Chair and
Maggie Gould, Planner:

I am a concerned citizen, mother, grandmother and a retired teacher from Albuquerque Public Schools (APS) and Central New Mexico College (CNM). This is my testimony against the proposed City of Albuquerque (COA) Edith Transfer Station on the intersection of Edith and Comanche NE.

The change in operations will greatly impact the *Quality of Life* in the nearby communities as well as the entire Albuquerque metropolitan area. *(Please refer to the data in the chart below.)* Within a 2-mile radius, there are 9 schools with a combined population of 4,833 students who will be directly affected by: air quality/pollution/water contamination, health hazards, noise and high volume of traffic. *(Student population will be subject to change with the density living complexes along 4th Street and other designated areas according to the Comp Plan.)*

NOTE: Comp Plan Policy II.C.I.k states that “citizens shall be protected from toxic air emissions.”

The Traffic Study Impact Analysis P.9 b. Land Use and Intensity states that there will be 248 garbage loads per day – direct hauling and 500 daily directional trips.

With this data, students and other citizens will be exposed to high levels of air pollutants: sulfur dioxide, carbon dioxide, contaminated water, noise measurements below standard ordinance established by the COA and the high volume of traffic: heavy equipment trucks and increased volume of motor vehicles which will compromise their health and safety. Studies have shown that health hazards and excessive noise levels hinder students’ hearing, general health and their academic performance. (This is contrary to the Comp Plan Policy II.C.I.k.)

Below is a Data Chart consisting of information in collaboration with the North Valley Coalition and the Health Impact Assessment Committee, 2014-2015.

| Areas of Concern. | Description/Factors | Data | Reference(s) | Findings |
|---------------------------|---|---|---|---|
| Air Quality/Pollution | Increased indoor/outdoor air pollution from diesel fuel and particles of matter (PM2). | Increase value of five pollutants: sulfur dioxide, ozone, nitrogen dioxide; carbon monoxide; particle matter. | Peel, J.L. et al., 2005; Environmental Protection Agency, 2004 | Air emissions from the WTS will increase releasing 40 carcinogens because 90% of the garbage trucks use diesel fuel. |
| Water Quality/Storm Water | Increased surface water runoff from operations and increased ground water contamination. | Pollutants deposited on the ground's surface are leading cause of surface water impairment. | Hsieh & Davis, 2005; EPA, 2012-2003 | Increased water borne diseases; increased employee and school absenteeism. |
| Noise Levels | Unwanted sound that is measured in decibels (db). | Major sources of environmental noise to the proposed WTS are traffic volume, overall operations. (Noise measurements exceed the COA's noise ordinance.) | Evans, Lercher, Meis, Ising, Kofler, 2001; COA's Noise Control Ordinance, 1974, 1975, 2001. | Noise exposure is associated with sleep disturbance, hearing impairment and learning difficulties; increased blood pressure. |
| Health Hazards | Prediction of air pollution and health impacts on community. | Air polluting appears to be linked to high rates of stroke, heart disease and lower respiratory disease. | National Environmental Justice Advisory Council et al., 2000. | Higher susceptibility of children/adults to respiratory/pulmonary damage/disease. |
| Traffic Volume/Safety | Increase of heavy truck and private vehicle traffic. (Still uncertain of the number of additional garbage trucks and semi-trucks from construction and operation of the WTS.) | Predicted increase of 173% of round trips into and out of WTS: 614 | Kim, et al., 2010; Rakha, et al., 2005; Jackson, et al., 2001 | Severely congested traffic flow on Comanche/Griegos I-25 Interstate: safety problems associated with congestion: truck and vehicle collisions; pedestrian collisions. |

In conclusion, EPC commissioners, I strongly **URGE** you to consider my testimony and **REJECT** the COA's proposed ETS. This will be a travesty for our children, elderly and citizens near the proposed site, which will also affect the City at Large *Quality of Life*.

Thank you,

Camille Varoz, Concerned Citizen

Gould, Maggie S.

From: Jami Morgan <jami@zialink.org>
Sent: Tuesday, January 03, 2017 8:28 AM
To: Gould, Maggie S.
Subject: Re: Zone Change project #1010582 (EPC Mtg)

Please consider this my Official "Packet Letter" for members of the Environmental Planning Commission (hereafter to be called the EPC) --

Ref: project #1010582

Dear EPC Members, while I appreciate your participation in local government and hopefully your commitment to true Environmental Protection, it was disappointing to learn over the holidays that letters for the upcoming zone change hearing (so the Edith Waste Transfer project can proceed) had to be submitted by 9 am today. This is, as you know, the first business day after the holidays, so trying to rush off a letter to meet this ridiculous deadline feels similar to learning this morning that our new Congress met in secret hearings overnight trying to abolish their independent Ethics Oversight Committee -- hard to take.

So no I did not drag out my stack of government rules and regulations over the holidays and spend time researching so I could meet this inane bureaucratic deadline. I simply want to put you on notice that we are aware that you are trying to make this zone change at the 11th hour so you can proceed with this awful project. Why do I call it awful?

In the 30 years I have lived in the near North Valley (near the intersection of Griegos and Fourth Streets) traffic has become absolutely unbearable. We feel trapped just trying to exit our residential streets to access Griegos or Fourth. We were promised, during many past zoning and planning hearings over the years, that Second Street would remain the commercial access for heavy trucks and high traffic, but that has NOT happened. You can review traffic studies (and I surely hope you do before your hearing on January 12, 2016) and see for yourself the incredible increasing traffic on these streets. What those studies may not show is the ever-increasing size and weight of trucks that plague our once quiet neighborhoods. In fact, recently huge, heavy dump trucks were using San Lorenzo as a "through way" since despite my pleas, no one has ever installed speed bumps here. When Fourth Street is blocked (as it often is and was recently for sewer line repairs), massive trucks rolled at high speed on San Lorenzo. That is totally unacceptable! Our streets were not designed for this amount of weight or traffic.

So, count me vehemently opposed to your plans for changing the zoning from M-1 to SU-1 so the City can proceed with the Edith Waste Transfer station which will inevitably create more traffic and far more noise in our residential areas. Put the station in one of the industrial areas, not this close to our neighborhood which was once designated as a future "artistic and creative living" area. Ha! It's becoming a nightmare. I will provide more specifics in my next letter (due by January 10) and present them in person at your hearing.

Very concerned resident,

e. Jamelle Morgan, 613 San Lorenzo Ave. NW, Albuquerque, NM 87107

Good Morning,

I am Larry Stepp owner of American Marine and Stepp's Custom at 4404 Edith N.E., next door to their site. I have been in this business for over 42 years. I've been at this location 38 years and lived in the house until Edith was widened.

I find nothing in the zone change and Waste Transfer Station plans that will be a benefit to me or my business. I have read the Comprehensive Plan and wish to use II.C.4a, 1 thru 7, Noise, as my reasons to oppose the zone change. There is nothing the city can do short of building a 20 foot wall up their driveway and behind my business to reduce the noise they will produce. They plan to use this driveway for all garbage trucks in and out and all transfer trucks in and out.

1. They are too close and higher than my property.
2. They plan to move the driveway 70 feet closer to my property.
3. No non-noise zone close to me.
4. Their driveways are not compatible to my land use.
5. No study of noise on my property has been made or considered.
6. No noise mitigation measures are in place or considered for businesses and residents adjoining their site.
7. Conflict, I will not be able to conduct business in or out of my buildings because of the constant noise. I visited Eagle Rock and from outside you hear loaders, trucks, back-up alarms, roars and bangs. The proposed station will be much closer and busier.

I've listen to crashing glass for years at the recycle bins next door. They are so loud at times conversations must halt until the recycling is done. The noise from the WTS will be constant and much closer by at least 100 feet.

I oppose the zone change on policy II.3.C1-3 Illegal dumping shall be minimized.

1. The public is not after years educated on how to use recycle bins. They will not be for the convenience center.
2. The city has only recently begun to clean up this site but not next to me. I have to pick up to avoid a fire.
3. There is no enforcement of the recycle rules, never has been, never will be. People leave everything and anything there: toilets, oil, paint, furniture, beds, wood, windows. I believe there are cameras but nothing seems to ever be done to prevent the mess.

When the center is closed or too busy the public will dump where ever they can, whatever they have hauled down. They will not haul it back home for another day. If they dump on private

property the city will not come and clean it up. The property owner is responsible to clean it up. We know because some of us have had paint and oil left on our property and the city was no help. We had to haul it to the proper disposal sites.

The zone change should not be approved for these and many more reasons.

It would be very harmful to me, my business, and my property. I am only one of 50 businesses in the immediate area that would be harmed by this zone change.

THANK YOU

Collins Engine-Generator Service, Inc.

P.O. Box 6264
Albuquerque, NM 87197
Phone 505 720-9815
Fax 505 883-2785

Address to:

Karen Hudson, Chair
C/O Vincente Quevado, Planning staff
Environmental Planning Commission
PO Box 1293
Albuquerque, NM 87102

RE: Project No. 1010582/Remand from City Council

Dear Chair Hudson,

I am the owner of Collins Engine Generator Service INC and our property and business is adjacent to the proposed Waster Transfer Station. My property will decrease in value at a minimum of \$1,800,000.00 if permitted. It will be impossible or much more difficult to continue to operate my business because of the increase in traffic. Much of the business requires meeting potential customers outside and this would be within 25 feet of the idling trash trucks and private vehicles that are waiting to enter the building to offload. The increase in traffic will make access to my business more difficult and consequently I will lose business. The decrease in value will occur for the property because of the increase in traffic, the noise from the trucks idling. My place of business is located right next door and the undesirable amount of noise, traffic, smells, and rodents will cause a huge impact on my work environment. This will be a detrimental deterrent for my customer base.



Shannon Boles
Owner/President
Operating at 4310 Edith NE

Questions: David Wood, wood_cpa@msn.com 505-221-2626

My name is Larry Stepp I am the owner of Stepp's Custom and American Marine. I am located at 4404 Edith blvd. NE. Directly in front of and adjacent to Solid Waste Management. This is where the proposed Public Transfer Station (Public Dump) is supposed to be located. I am adamantly against the above mentioned project. I do not feel that I could continue to operate my business of over 38 years, which has served the people of Albuquerque. The many reasons I would no longer be able to do this are as follows:

- 1) Noise, (diesel trucks, truck and equipment warning bells)
- 2) Air Pollution, (diesel trucks and equipment running all day long within 10' of my property)
- 3) Traffic, (trucks, equipment, etc.)
- 4) Rodents, (mice, rats, cats, dogs, skunks, raccoons, etc.)
- 5) Birds, (Pigeons, crows, etc.)
- 6) Insects, (flies, mosquitos, gnats, etc.)
- 7) Waste and Storm Water runoff
- 8) Fire and Hazardous Waste danger
- 9) Illegal Dumping (such as what already takes place on the existing site)

Thank You for your consideration Larry Stepp.

January 2, 2017

Karen Hudson, Chairwoman
Environmental Planning Commission
c/o City of Albuquerque Planning Dept.
600 2nd Street, NW
Albuquerque, NM 87102

emailed to Maggie Gould, Planner

Re: Edith Transfer Station Project #1010582

Dear Ms. Hudson:

When this project was heard by the EPC in 2015, the North Valley Coalition sent in a letter stating the results of voting on this issue by its board members and members present. We included a list of reasons for opposing it. We are resubmitting that letter and still have the same concerns. The project has not changed and our concerns have not been addressed. At the last hearing, there were 35 speakers presenting public comments and not one supported this project. Please take notice that the City did not send out notification to these speakers, advising them of the new application.

The City carefully submitted their application on December 1 so people opposing the project could spend the holidays preparing for an early January hearing, rather than enjoying the time with family and friends. This timing demonstrates an arrogance and disrespect towards the citizens of this community who are only interested in protecting the health, safety and well being of its residents and citizens of Albuquerque. This project WILL impact everyone who uses the Big-I, travels the Montano Bridge, drives along Griegos/Comanche, uses the Comanche/I-25 interchange, breathes air in the area.

Traffic is a major concern of everyone who attended the meetings or uses the area and hears about the project. A traffic impact analysis has been submitted, prepared by Wilson and Company, the project manager with a vested interest in making this project happen. This study, prepared according to county standards, was not approved by the City or the County. As a matter of fact, it was not even submitted to the City or the County. We had an independent analysis done by Sustainable Systems Research on a draft traffic study. They reviewed this study and confirmed the shortcomings are still not addressed.

We appealed the original ruling for a zone change. The LUHO prepared 4 pages of traffic issues/concerns. One of the issues was whether a Traffic Impact Study was required, which would have required final City Approval. One determining factor for this requirement is analyzing "the developments peak hour". This was not addressed in either the prior application or this application. Traffic Engineering appears to ignore this criteria.

Once again, we have concerns about the process. An application submitted by Solid Waste, a City Department, is approved by Planning, a City Department, and then submitted to the Environmental Planning Commission. We are hopeful that after education regarding zone change decisions needing to be justified by policy, that the EPC will make an independent judgment in this case.

Without having a valid, independent traffic study studying the effects of additional collection trucks (garbage trucks), transfer trucks (semi-trucks) and private vehicles, on everyone using these roads (pedestrians, drivers, bicyclists, skateboarders) the City cannot prove that the permissive use of an SU-1 zone is not harmful to adjacent property, the neighborhood or the community. Therefore, according to R270-1980, Section 1E, this zone map amendment request should be denied.

The NVC provides a forum for an exchange of ideas between residents, businesses, property owners, neighborhood associations, institutions and government toward preserving, protecting, and enhancing the North Valley Area consistent with the adopted Goals and Policies of the North Valley Area Plan. According to Section 1C of R270-1980, a proposed change shall not be in significant conflict with adopted elements of the Comprehensive Plan or other City master plans and amendments thereto including privately developed area plans which have been adopted by the City. This zone change allowing the Edith Transfer Station does provide significant conflict with the North Valley Area Plan and therefore the zone change should be denied by Section 1C.

Goal 1 states "To recognize the North Valley area as a unique and fragile resource and as an inestimable and irreplaceable part of the entire metropolitan community". While the City attempts to justify this goal by citing a savings of 2,000,000 miles, these miles are spread out over a 20 mile span (feasibility study, 2014) from the Big-I to the landfill. It is 2.1 miles from the Big-I to Rio Grande Blvd. exit. Therefore, a little over 1/10 of those miles (200,000) impact the North Valley. There is no mention of how many additional miles will be driven in the heart of the North Valley. I estimate that over 88,000 miles will be driven by garbage trucks and transfer trucks from I-25/Comanche to the site and this does not include any convenience center traffic or truck miles on the site. It is impossible to develop a transfer station with all the impacts of garbage trucks, semi trucks, garbage and private vehicles, state that it helps protect a unique and fragile resource, and have people believe that.

It is also impossible to use this zone change to justify goal 2 "To preserve and enhance the environmental quality of the North Valley Area by a. maintaining the rural flavor of the North Valley and d. reducing noise level impacts. The City justifies this by describing a state of the art facility enhancing the industrial area. This doesn't even address maintaining a rural flavor. While the facility might look beautiful, the argument doesn't begin to address all the impacts outside of the building and off the site - additional traffic, noise, odors, toxic air emissions, pollution. It hardly is justification to create increased noise and then state that putting some part of the project in an enclosed facility is reducing noise level impacts. This enclosed facility may reduce some of the increased noise level impacts created by the project, but certainly not the noise impacts outside of the building

and on nearby streets. There have been no noise level studies except as noted in the Health Impact Assessment.

Goal 3 "To preserve air, water and soil quality in the North Valley Area". The initial North Valley Area Plan included prohibiting "hazardous waste disposal sites and transfer stations and solid waste disposal sites". This was obviously a concern of local citizens back in 1993 and still is. Again, the argument of 2 million miles saved along the I-40 corridor is not proof that the air quality in the rest of the North Valley area, particularly in this location, will be preserved.

Goal 6 encourages "quality commercial/industrial development". A garbage station is just not a quality development.

Because the applicant has not proven Section 1C and 1E of R270-1980 to be true, this zone map amendment should be denied.

Sincerely,

Peggy Norton
President
North Valley Coalition

NORTH VALLEY COALITION, INC.

Individuals, Neighborhood Associations, Businesses & Community Groups Working Together

October 5, 2015

Peter D. Nicholls, Chair
Karen L. Hudson, Vice Chair
Environmental Planning Commission
c/o City of Albuquerque Planning Department
600 2nd Street, NW, 3rd Floor
Albuquerque, NM 87102

Hand-delivered to Dora Henry

Re: Edith Transfer Station, Project #1010582, Zone Map Amendment and
Site Plan for Building Permit

Dear Chairman Nicholls and Vice-Chairwoman Hudson:

The North Valley Coalition respectfully requests that the Environmental Planning Commission deny the City's zone map amendment and site plan for building permit for the proposed Edith Transfer Station.

At our October 1, 2015 meeting, by a membership vote of 34 to 1, the NVC voted to oppose the Edith Transfer Station, setting forth numerous reasons. Our full statement is attached to this letter.

Following the vote, all board members present were polled to confirm their votes. All of the 19 board members in attendance, including five members at large and 14 members representing organizations, voted in favor of the statement and in opposition to the ETS.

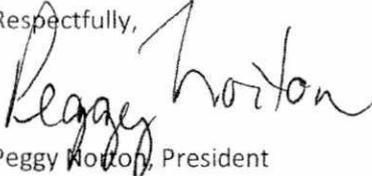
The 14 represented organizations are the following:

- 1) Alvarado Gardens Neighborhood Association
- 2) Greater Gardner Neighborhood Association
- 3) Jardines Escondidas Homeowners Association
- 4) Maria Diers Neighborhood Association
- 5) Martineztown Work Group
- 6) Near North Valley Neighborhood Association
- 7) North Edith Commercial Corridor Association
- 8) Rio Grande Boulevard Neighborhood Association
- 9) Sierra Club/Bosque Action Team
- 10) South Guadalupe Trail Neighborhood Association
- 11) Stronghurst Improvement Association, Inc.
- 12) Symphony Homeowners Association, Inc.
- 13) Western Meadows Area Civic Association
- 14) WTS?

The City's single-minded desire to save money is no justification for locating a waste transfer station in a vulnerable, already-burdened community, thereby risking the health, safety and quality of life of the thousands of men, women and children who live, work, recreate and travel in the area. The City's application fails to satisfy the requirements of Enactment 270-1980.

We urge the EPC to consider the NVC's opposition, and to deny the City's requested zone map amendment and site plan for building permit.

Respectfully,

A handwritten signature in cursive script that reads "Peggy Horton". The signature is written in black ink and is positioned above the typed name.

Peggy Horton, President
North Valley Coalition

Copy via e-mail to:

Vicente Quevedo, Assigned Staff Planner
Savina Garcia, PE, Wilson & Company

NVC's Position on the Edith Transfer Station

As adopted October 1, 2015 at the Board/Membership Meeting

The North Valley Coalition (NVC) opposes the Edith Waste Transfer Station (ETS) in its currently proposed form and at its currently proposed location, as planned by the City of Albuquerque. Our reasons include but are not limited to the following:

1. Federal Environmental Protection Agency (EPA) guidelines for effective public participation (as spelled out in *Waste Transfer Stations: A Manual for Decision-Making*) were not followed. No advance notice was given prior to site selection. No siting committee was formed.
2. In the same document, the EPA advises that "[d]uring the site selection process, steps should be taken to ensure that siting decisions are not imposing a disproportionate burden upon low-income or minority communities. Overburdening a community with negative impact facilities can create health, environmental, and quality of living concerns. It can also have a negative economic impact by lowering property values and hindering community revitalization plans." The City's siting decision creates precisely this burden.
3. The City's first public meeting was held in January 2015, after the site had been chosen.
4. There have been no economic studies comparing possible sites or analyzing the economic costs of traffic impacts on nearby businesses, increased workers compensation claims, decreases in property values, damage to historic properties, and increased health costs.
5. Neither a final full site plan nor a final traffic study has been presented to the public.
6. Over the past year, NVC members have educated themselves about waste transfer stations generally and the proposed Edith Transfer Station. NVC members have participated in good faith in all of the City's public meetings about the proposed Edith Transfer Station.
7. Members of the Greater Gardner, Stronghurst and Near North Valley neighborhood associations, along with a member of the NVC, participated in good faith in the City's Design Advisory Task Force.
8. The NVC Board voted unanimously at the August 21, 2014, board meeting, to request an independent Health Impact Assessment (HIA) of the ETS by health and other professionals, with the understanding that the HIA would be used to inform decision-makers during the approval and permitting processes.
9. NVC and other community members participated in developing the HIA.
10. The NVC also requested an independent professional review of the City's traffic data and other traffic information.
11. Based on the HIA and the Traffic Review, it can reasonably be predicted that the health and well-being of community members living, working, going to school and recreating near the site will suffer.
12. Neither of the COA's final two design options is acceptable; one pushes the additional traffic to the congested Edith and Comanche intersection, and closer to residents, and the other compromises businesses on Rankin Lane and Rankin Road.

13. In its final design option, the City has not used landscaping and other design features to adequately address environmental and quality of life concerns.
14. The city refuses to acknowledge that the project will have impacts beyond the perimeter of the site. Therefore, they have been unable to address the concerns of the community including traffic congestion; air, water and noise pollution; reduced safety for multi modal users.
15. It has become increasingly obvious that there is no way to design this facility to fully address the many reasonable concerns from both residents and business owners regarding traffic, noise, odors, trash, air quality and quality of life.
16. A community-vetted and adopted master plan for all waste management City-wide is necessary, as described in the Albuquerque/Bernalillo County Comprehensive Plan and the City of Albuquerque Zoning Code.

January 2, 2017

Dear City Council Members,

I own the house at 141 Griegos Road NW, where I have lived since 2005. My house is less than ½ mile from the proposed Edith Transfer Station.

Like many of my neighbors, most of my net worth is in my house. My property value, along with my neighbors, will plummet if you site the Edith Transfer Station here. Given that there are over 18,000 people within a two mile radius of the proposed site, that's a HUGE drop in net worth. It affects some of the most income insecure people in the entire City.

On page 93 of the Health Impact Assessment that was previously submitted, the Current Economic Wellbeing and Health in the Impacted Community section states:

Ready (2005) found that all “high-level” (greater or equal to 500 tons of waste/day) landfills are associated with a 12.9% depreciation in property values for adjacent properties with an estimated property value gradient of 6.2% per mile. BBC Research and Consulting (2012) found that properties within .75 miles depreciate by 9% while those within 1.5 to 1.75 miles depreciate by 0.8%.

Likewise, on page 93:

Because of negative public opinions of WTSs and their impact on property values, many municipalities (Pawtucket, Rhode Island, Minneapolis, Nashville and New York City) have stopped WTSs from locating in their communities.

Are you seriously proposing that the City's Solid Waste department has a better solution to solid and hazardous waste than New York City with a population of over 7 million?

And what of the immediate health impacts such air pollution on 2 elementary schools and a Little League Park all within two miles of the proposed site? There are already too many companies within this area that must have Air Quality permits from the City, including the GCC cement plant and Holly Asphalt. I know that Air Quality permits are not based on the cumulative effects of air pollutants, but how can all of the garbage for over 500,000 people not negatively impact the air quality by magnitudes of scale the City is not willing to address?

I suspect that the reason you want to site the ETS here is because you thought that you'd get no pushback from the mostly low income community. But we do care very much. Plus we are supported by many organizations from all over the City that think this is a gigantic mistake for a myriad of reasons.

As City Councilors you have the responsibility to work for the betterment of all communities, not just the more affluent neighborhoods. Please do not site the ETS in our neighborhood.

Best regards,

Marcia Finical, Homeowner



Scott Hale

505.301.9083 scott_hale@me.com 2321 Camino de los Artesanos NW Albuquerque, NM 87107

January 2, 2017

Environmental Planning Commission
% Maggie Gould, MCRP
City of Albuquerque, Planning Department
600 Second Street NW
Albuquerque, NM 87102

Subject: Project # 1010582–Edith Transfer Station

Dear Environmental Planning Commissioners:

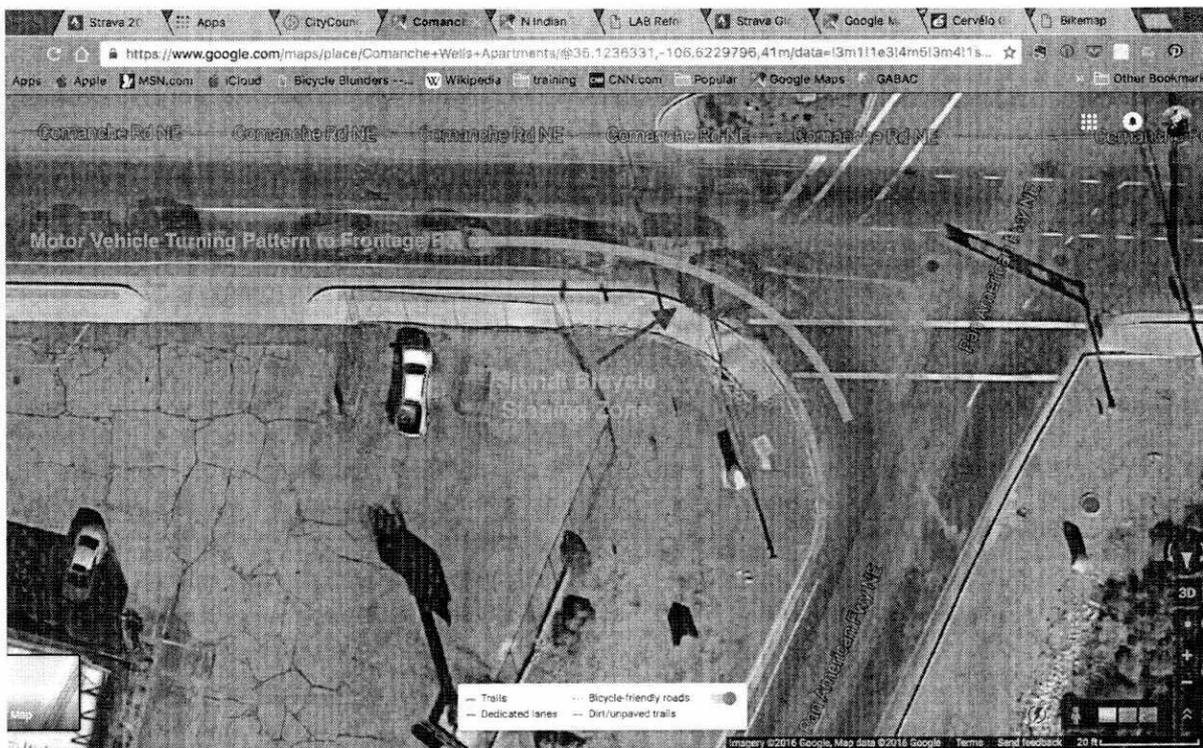
Please consider the following comments and those in the attached “visual” document while evaluating the application for zone change to construct/upgrade the Edith Solid Waste facilities. The impact on bicycle travel, as well as pedestrian and ADA user communities is significant with the introduction of several hundred daily additional heavy vehicle trips through the Griegos–Edith to I-25 corridor. Further, the inextricable link between street use/impacts and land use/impacts is of particular importance, especially for vulnerable street users, for promoting healthy community, safety, and general community well being as outlined in R-270-1980, A.

A quick analysis of the immediate impacts are the additional trips through the Griegos/Edith intersection as currently all heavy vehicle traffic enters and exits of Griegos East of Edith. This change is significant in a couple of notable ways: 1) 600+ additional heavy vehicle trips will occur through the poorly performing Edith/Griegos intersection for vulnerable users. Of specific concern are the free right–no stop, yield condition NB to EB where cyclists not generally expected; poor geometric alignment for EB bicycle traffic through pork chop area where cyclist actually are required to bump out into MV lane; archaic, freeway type turn bay that encourages high speed travel NB Edith and through EB turn onto Griegos and insufficient bike lane facilities immediately east of merge lane); 2) Employees that now enter off Griegos will also use Edith/Rankin Road requiring an undetermined, but certainly significant amount of additional MV traffic both on Edith and through intersection; 3) Edith is a significant N-S bike route corridor with no additional ROW for more adequate bicycle facilities. The performance for all modes at Griegos/Edith, Griegos/I25 Frontage and Griegos between RR tracks and I-25 must be considered to comply with R-270-1980. In previous EPC hearing for the transfer station, consideration focused on MV volume and timing in Wilson & Company Traffic Assessment and seemed to disregard bicycle and pedestrian impacts outlined in the assessment completed by Sustainable Systems Research, LLC, . Further, it would be prudent to take the motor

vehicle level of service model discussed in previous EPC hearing and overlay it with a Bicycle level of service analysis so that specific Edith/Griegos and Griegos I-25 signalized intersection impacts can be assessed.

Equally important to consider as part of this recommended study would be the impact of additional heavy truck travel on already deficient bicycle lane facilities on Griegos (1999 AASHTO states bicycles require minimum of 3'4" operating space, 2015 TRB research found that 4' required—note this is with no consideration of additional safety buffer that might be required similar to MV traffic lanes of 1-2' each side).

Remedying these simple conditions must be carefully considered if Griegos and Edith are to remain recommended bike facilities by CABQ and MRCOG. As an example, the existing condition of excessive vulnerability @ Griegos/I-25 in the photo below is easy to identify, but problematic in terms of both engineering and expense to remedy.



My final concerns relate to the previous EPC review where bicycle (and pedestrian) concerns were minimized by two problematic assumptions. One, stated by non cyclist is that Edith was not a safe place for cyclists anyway or something to that effect. The reality is

the bike facility designation by MRCOG and CABQ was vetted and approved by planning and engineering staff with significant bicycle expertise. While deficient in current state, there is significant need for bicycle facilities on both corridors impacted by the Edith Transfer Facility if we are to promote healthy, alternative transportation modes.

My second concern was proposed by the applicant as a "safety" solution to ameliorate bicycle and pedestrian vulnerability. That was the stipulation that Solid Waste would add protective side guards to all collection and transfer vehicles. While that sounds good, it needs to be pointed out that the guards are just that, a protective device, not a safety solution to the dangerous environment that exists in the many conflict zones along the corridors these vehicles must travel between proposed ETS and I-25.

An example of why this is important can be found in industry/OSHA environment in the context of grinders and grinder guards. By themselves (without safety glasses, protective shield, hard hat, heavy gloves, welder coat/sleeves, etc.) is just one protective device designed for a very specific supporting task, not operational grinder safety. For safe Grinder operation you need to have all of the elements above and many more like Hazardous materials and closed space operating procedures or you run the risk of explosion or fire. My point is that vulnerable street users, especially cyclists that operate vulnerably in/along/ and sometimes across the roadway, we need both significant situational awareness and also all the help we can get in both bicycle and Motor Vehicle lane facility design, communication (signage/lane markings), etc., etc., etc.. A protective device, no matter how well intended, is going to fall way short without significant attention paid to all potential intents and uses.

I appreciate the significant dedication and service each EPC Commissioner makes to our community. I hope that in this particular evaluation you require a bit more rigor from the applicant when it comes to street safety and meeting community standards, well being and safety goals. As I reviewed the disparate traffic analyses and balanced these with observations from the dozens, if not hundreds of trips I have taken through this area since this project was first presented to GABAC, I am stuck by how little we know of existing conditions, potential improvement opportunities and how little is being required by applicant to minimize street impacts, increase safety and address issues/concerns presented by impacted community.

Thank you for the opportunity and consideration.

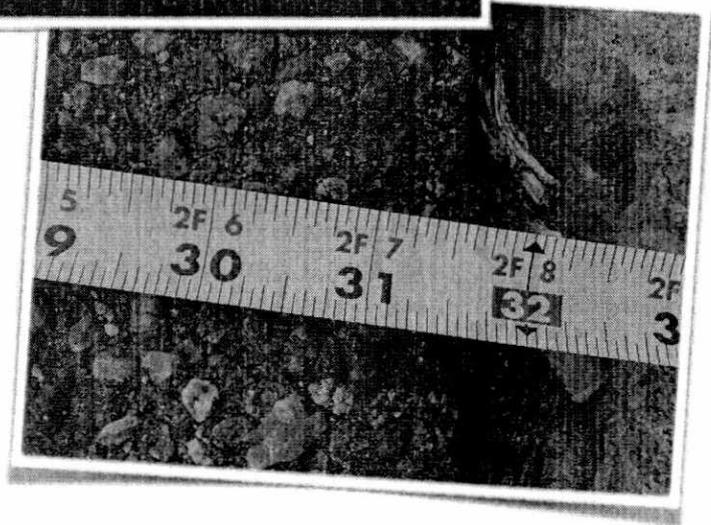
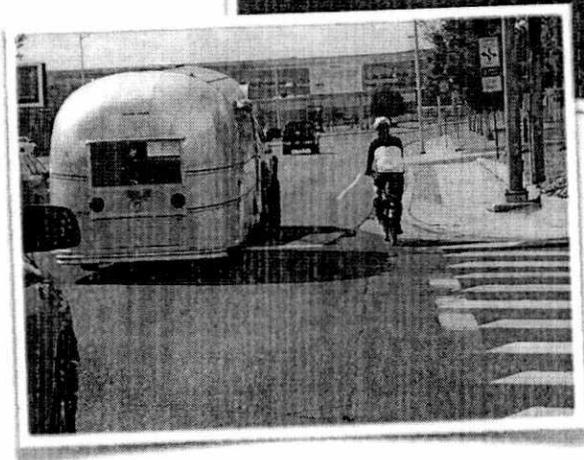
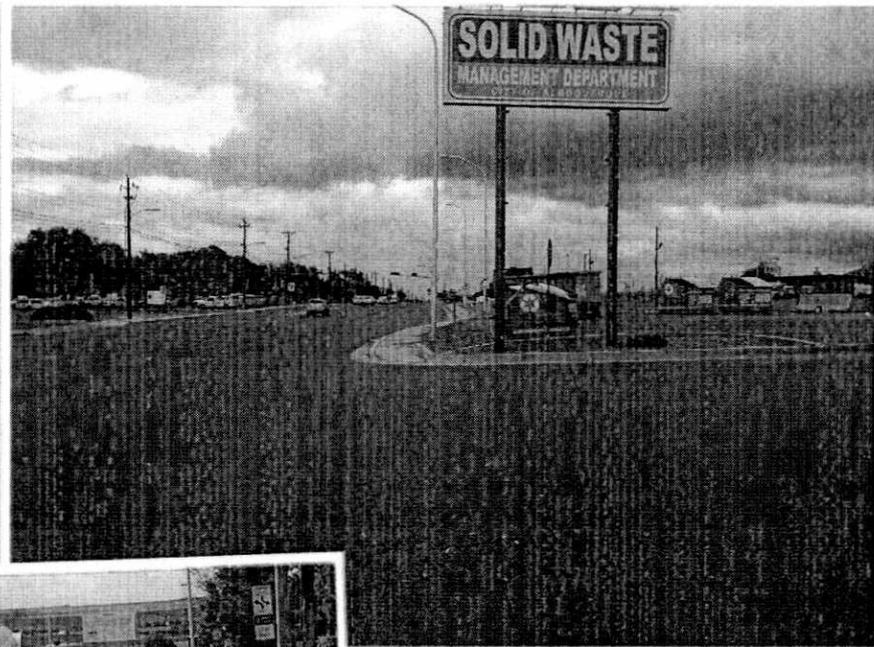
Scott Hale

Former GABAC Member

2321 Camino de los Artesanos NW

Albuquerque, NM 87107

Edith Transfer Station



Site Visit October 4,
2015

ETS Bicycle Network Impacts

Edith—Important N-S Bicycle “Route”

Comanche—Connects Westside/River Mountains
—Only ABQ Complete E-W Bicycle Facility

Edith

Edith Boulevard offers significant bicycle connectivity as it is one of the longest N-S bicycle routes in the Greater Albuquerque area (Gibson to the South; Osuna Road to the North (but often used to communities further to the North including Sandia Pueblo and Bernallillo). In addition to it's significant role as a long distance connecting bicycle facility, it also provides an ideal, low stress “local” route to and from many inner city destinations. Currently, there are no solid waste vehicles entering current SW Facility via Edith and very limited (30 parking spots) employee traffic. There is a Solid Waste recycle facility that is accessed via Edith but sees very little use¹

Of particular interest to bicyclists, especially in the context of safety impacts of Edith Transfer Station that have yet to be addressed are:

- Current MV activity to and from Solid Waste Facility is small (30 space?) parking lot to administrative building and Recycle Facility. Review of Circulation Site Plan show right in, right out, left in and left out access via Rankin Road; left in, right out via Edith for both Collection and Transfer Trucks. These new uses off Edith will have

significant impact on bicycle safety and the ability of the City to promote healthy alternative transportation modes. Safety along this corridor needs to be addressed for applicant to comply with R270-1980; A, MRCOG Bikeways Facilities Programming/Map and CABQ Bikeways and trails Facility Plan.

- North to East connection from Edith to Comanche is a free right, no stop, yield intersection movement (extremely hazardous for bicyclists) navigating West to East on Comanche which will see significantly more local heavy truck use the currently proposed ETS Facility will introduce (over 600 additional truck trips per day if Collection and Transfer Truck enter/egress off Edith rather than existing Griegos Entrance). The most important factor here, in relation to R270-1980 is that existing waste facility vehicles do not currently utilize this poorly designed intersection and the additional heavy vehicle traffic will discourage, rather than promote healthy transportation modes. If constructed, all waste hauling and transfer vehicles will utilize the Edith/Griegos intersection which will have a significant negative impact on bicycle safety on CABQ/MRCOG Planned and Approved efforts. This concern was presented to SW/Wilson Company at GABAC meeting early 2015. The response was that free right was older street design schema and would be updated as part of ETS Project.

- There is no evidence of any consideration outside the perimeter of the SW facility. Adequate consideration needs to be given to additional heavy vehicle and vulnerable street user conflict. When bicyclists are in roadway, street design and zoning decisions are inextricably linked and should be paramount in EPC analysis and decision making.

Griegos/Comanche

Comanche is the only continuous bicycle corridor that serves cyclists needing to get to and from the west side, the Bosque/Rio Grande area up to Tramway Boulevard and the Western Sandia Mountains. Additionally, due to close proximity to Montano River Crossing, it is the only NW/Westside bicycle connection to NE/SE Heights including Uptown, Sandia Labs/Kirtland AFB, UNM, as well as the Tijeras Canyon Gateway to the East side of Sandia and Manzano Mountains and recreational facilities.

Currently, bike facilities east and west bound through project impact area (for bicyclists 2nd street to North Diversion Channel including under i-25 and both frontage intersections are deficient by both AASHTO (Development of Bicycle Facilities, 4th Edition, 4.6.4) and NACTO (Urban Bicycle Design Guide, Page 6) guidelines and also CABQ DPM. As the following photographs taken October 4, 2015 show, the roadway the trucks will be traveling to access Transfer Station and then return to I-25 have width issues (we assume ROW driven but not clear from TIA, Application or Staff Report), signage issues, and lane marking/maintenance issues. Further, east bound under I-25, there is no bicycle lane though there is strange/confusing 3' concrete gutter pan striped to look like bike facility (actual dimension ~2.5')?

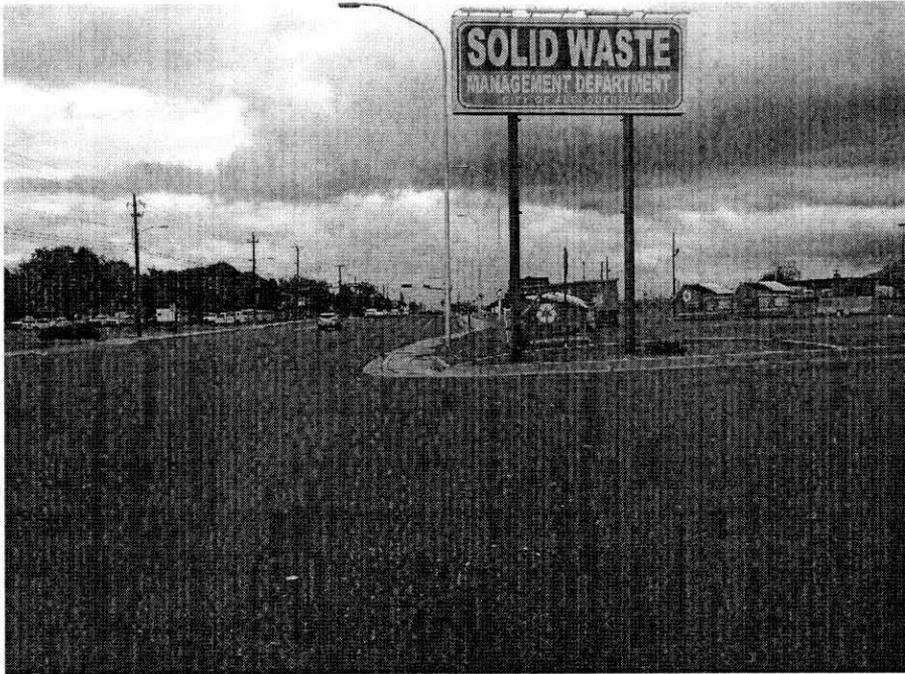
It is also important to point out that ghost bike at NE corner of Comanche/i25 was a fatality that was result of cyclist being run over by CABQ Waste Collection Truck. While witnesses unclear on what caused cyclist to fall onto roadway, result was certainly tragic and exhibitiv of concern cyclist have for facilities being impacted by a significant increase in heavy truck traffic. Heavy truck turning movements accessing SB

freeway onramp off Comanche with cyclists in deficient dimensioned bike lane (also in blind spot) certainly increases hazard and vulnerability to cyclists using this facility. The CABQ SWD commitment to eventually install guards on all SW vehicles, while appreciated, does fall more in the realm of equipment protective device rather than street safety. The ETS effort, particularly with regard to vulnerable street use, should focus on and commit to hazard and conflict elimination. Finally, the West bound bicycle facility underneath i-25 leaves cyclists extremely vulnerable as bike lane is less than half recommended lane width for bike lane facility and necks down to less than a foot (with off camber sewer grate at SB frontage road signal where cyclists queue).

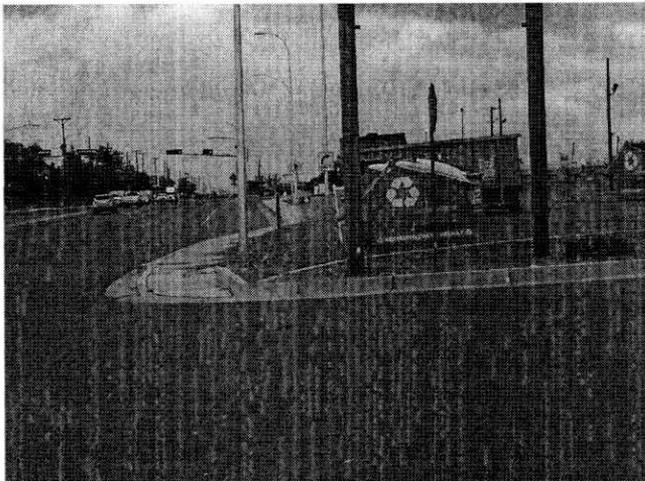
Important Consideration for both Edith and Comanche

Edith and Comanche as bicycle facilities and the need for safety/hazard consideration as part of EPC review of ETS zoning application needs to be considered in two contexts: 1) mobility and 2) access (particularly discouraging bicycle, pedestrian and ADA use) in relation to E-270-1980 (particularly a&c), Comprehensive Plan (all bike and multimodal references), CABQ Bikeways and Trails Plan (impacts much broader than just Goal 1 and objective 3; specifically negative/unaddressed impacts ETS may have on Goals 2 & 4), CABQ Comprehensive On-Street Bicycle Plan, and recently adopted CABQ "Complete Streets Ordinance" (E-0-2015-003), especially items A-G in 6-5-6-6–General Policy.

Photos of Edith and Comanche Bicycle Impacts



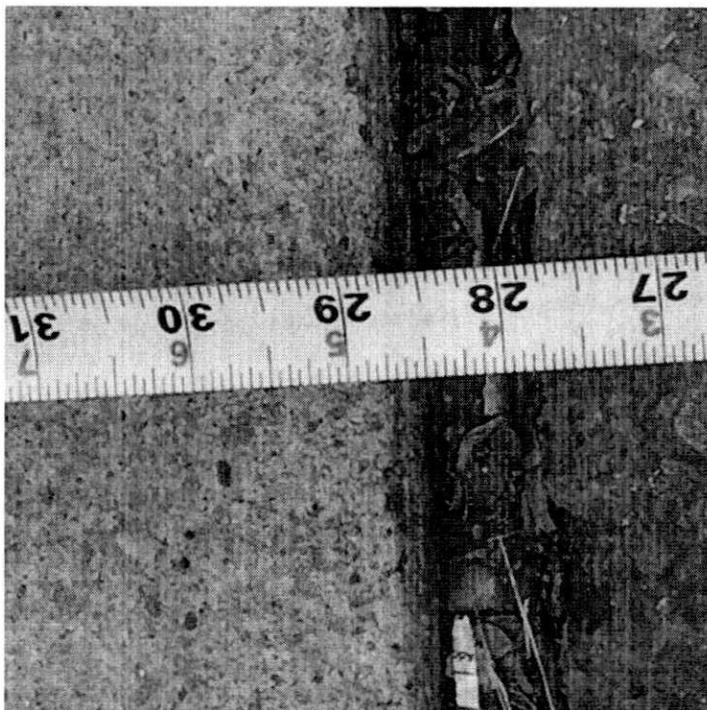
Current Community Recycling Facility and low use entrance to admin offices off Edith

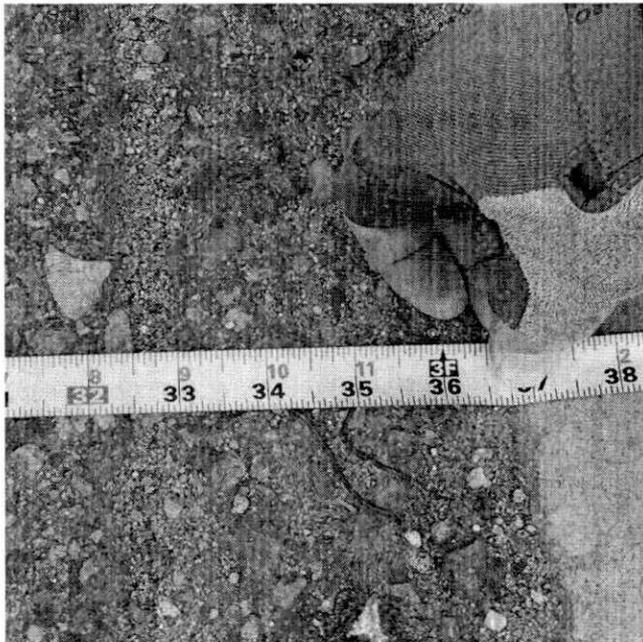


Unsignalized free right turn onto Comanche. Note Yield sign AFTER Pedestrian crossing to porkchop refuge



Measurement where bike lane recurs after signalized intersection (Comanche EB)

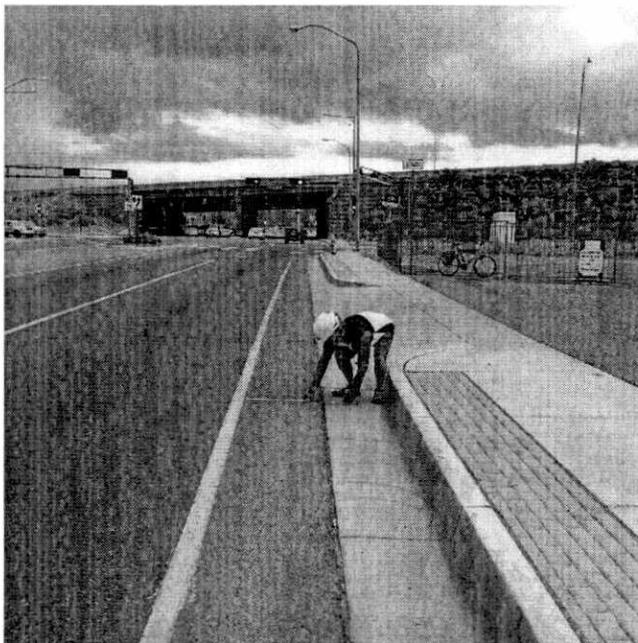




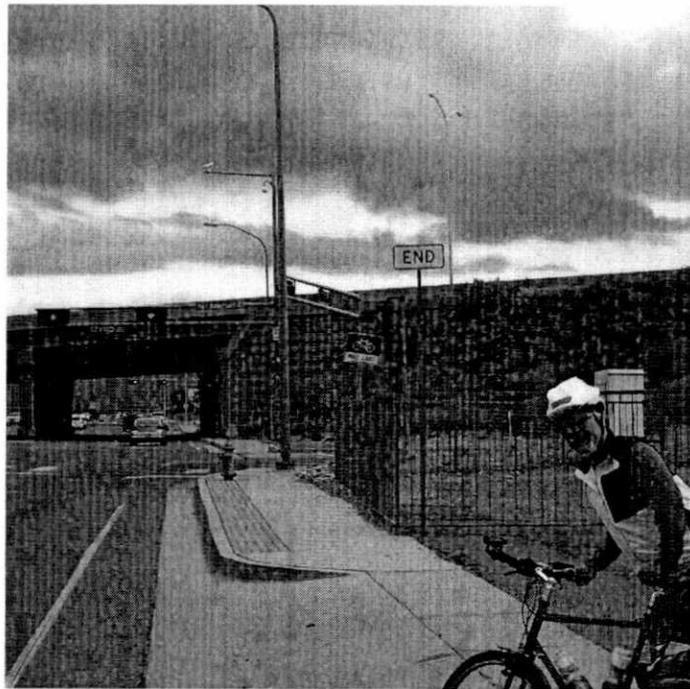
Widest Section of EB Comanche. AASHTO recommendation 5' . Application stipulation that bicycle facility impacts meet AASHTO "guidelines" inaccurate.



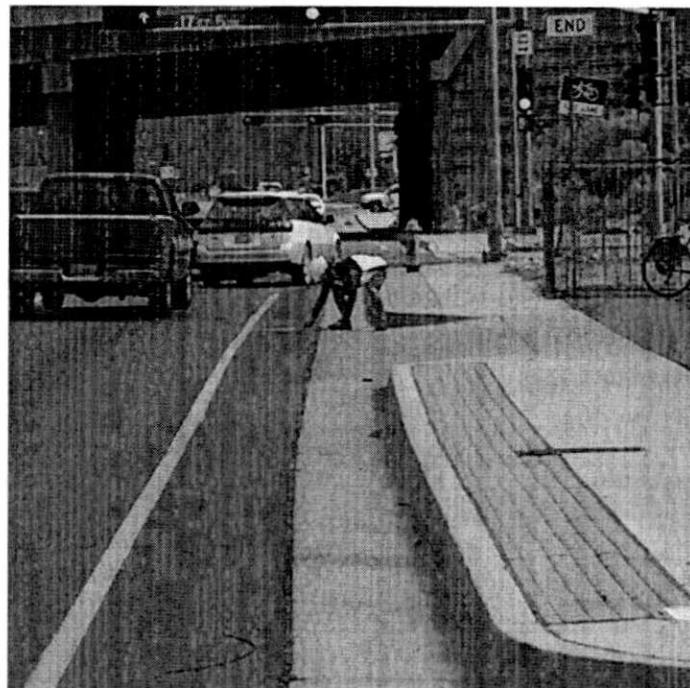
Posted speed limit (actuals significantly higher)



EB approaching right turn onto frontage road



Bike Lane less than 2.5' ~250' from turn onto frontage road (previous photo)



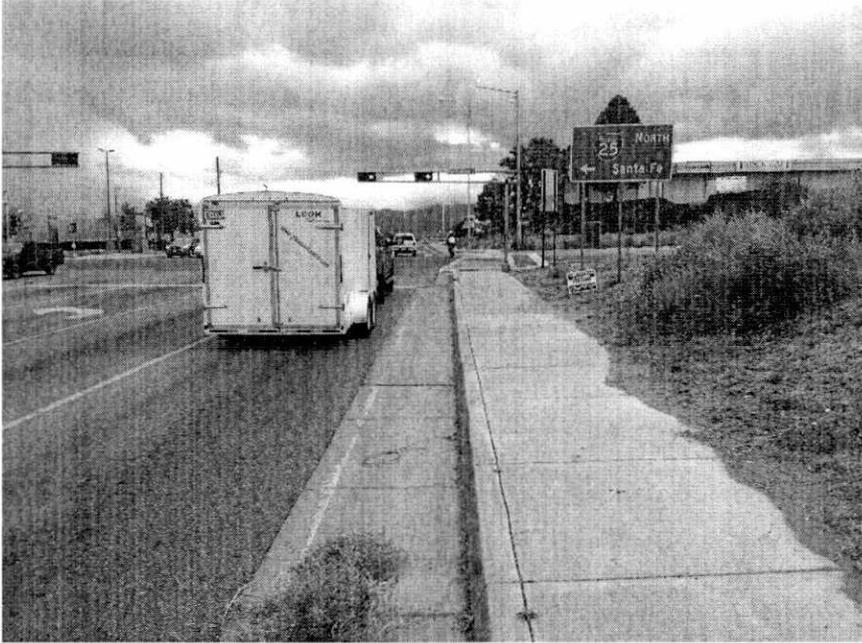
Note position of right turning vehicle right where cyclists need to queue if stopped at signal



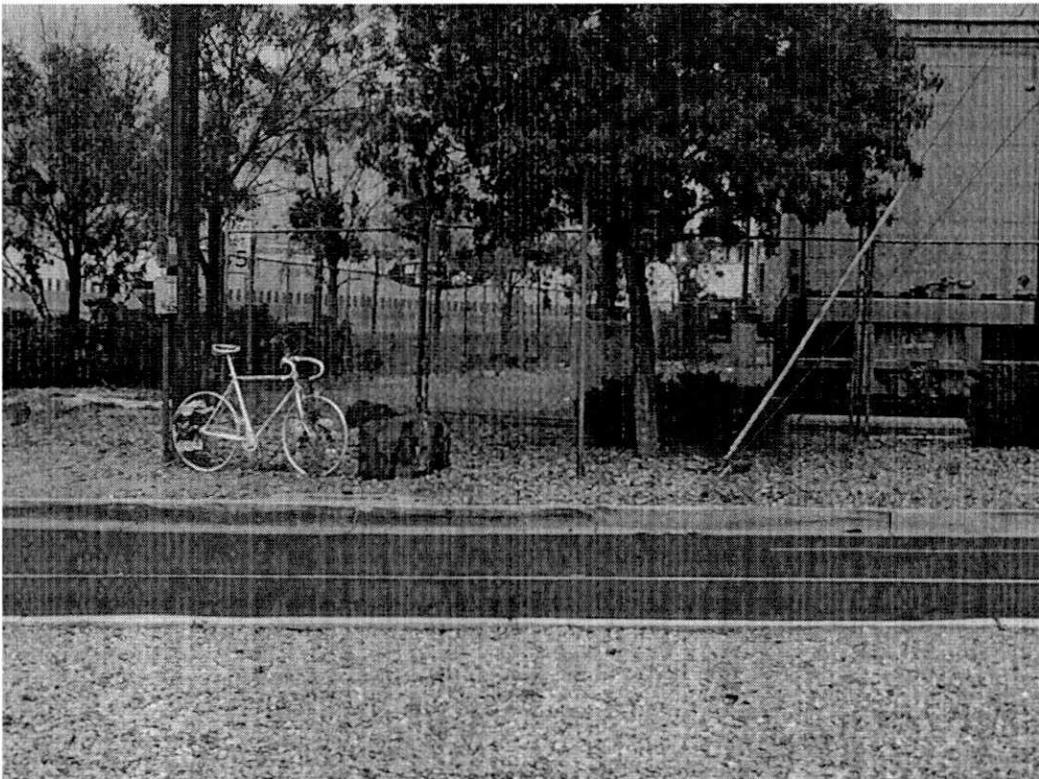
Cyclists need protection/space here. DO NOT want trucks turning on red or around cyclists...



Concrete gutter pan striped @ $< 30''$.
Bike Facility? Note sidewalk
deficiency as well.



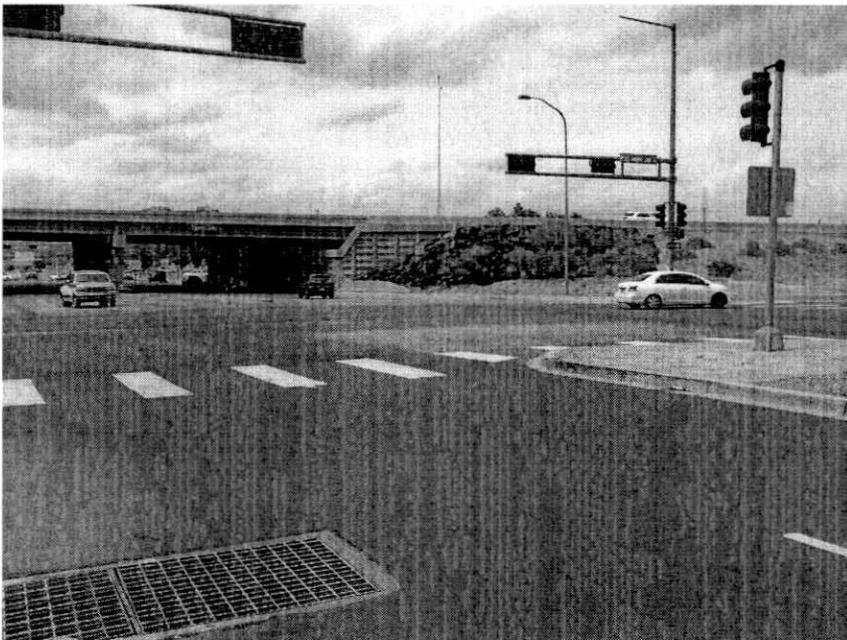
Not a pleasant place on bicycle.
Short yellow and no all red phase
make intersection risky if light
changes when cyclist beyond
stopping point



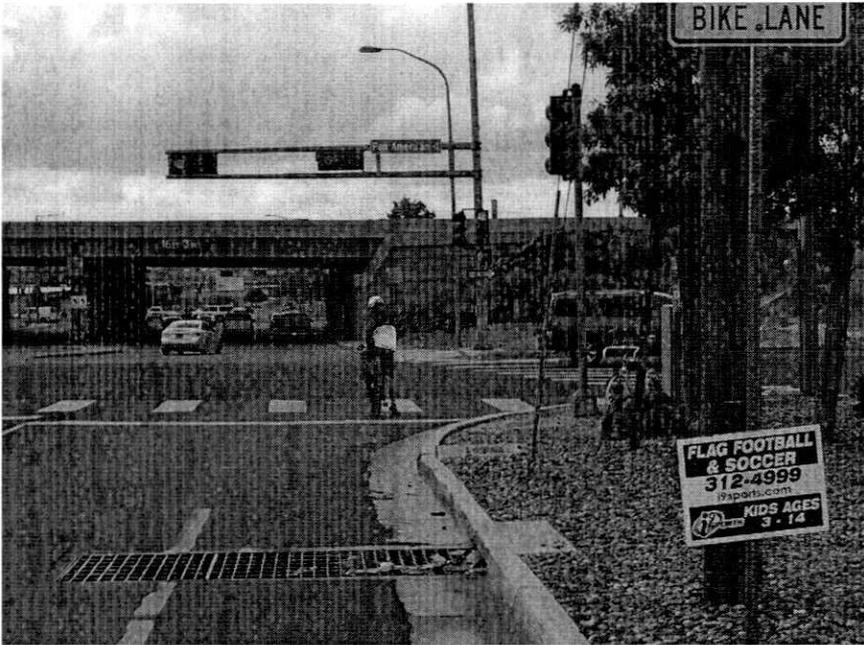
Ghost Bike NE
corner of I-25/
Comanche. cyclist
Timothy Vollman run
over by SW
Collection Vehicle



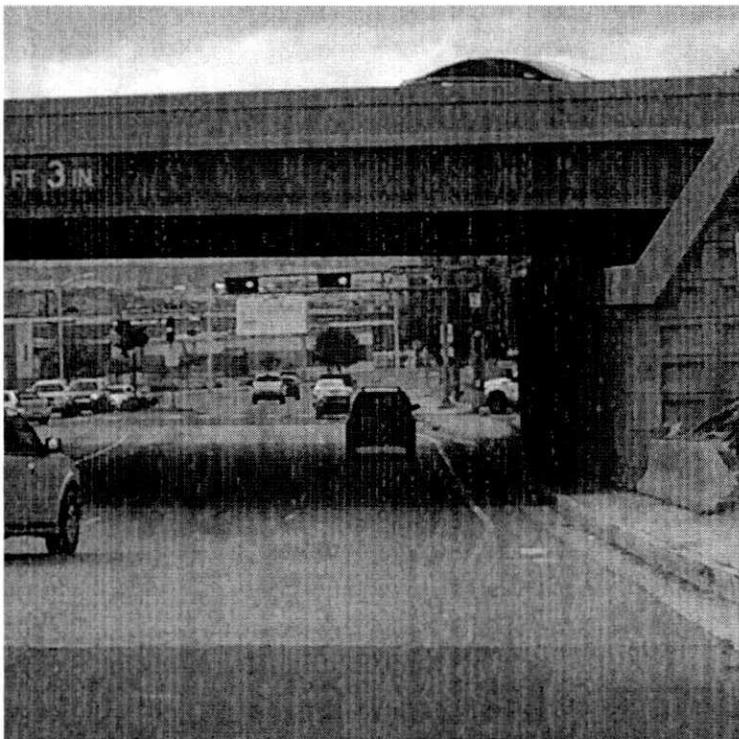
Speed Limit increases.
Bike lane dimension
increases to 4' still
below AASHTO/DPM
recommendations and
bicyclist safety best
practice guidelines



Perspective: very wide
intersection (with
insufficient signal
phases for bicycles)



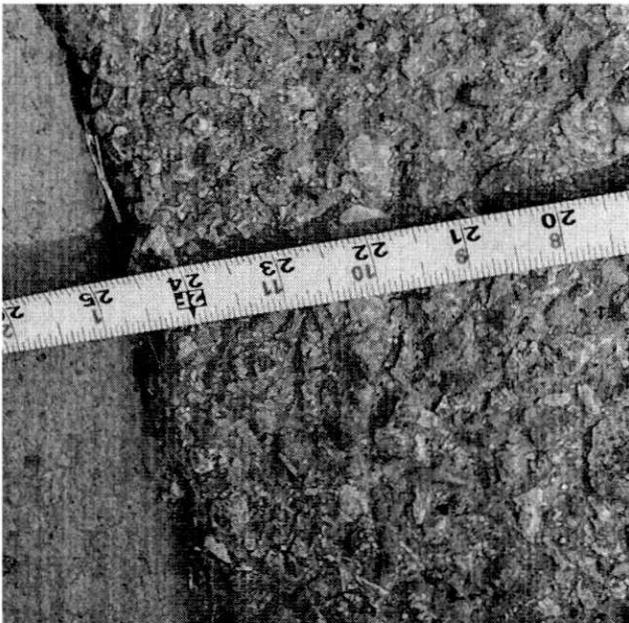
WB Comanche. Area in front of cyclist where transfer trucks would cross all lanes to enter Comanche off NB Frontage.



Bike facility marking then lane necks down



Scary Place to take measurement. Note sidewalk width



Width of bike lane where measurement in photo above taking place



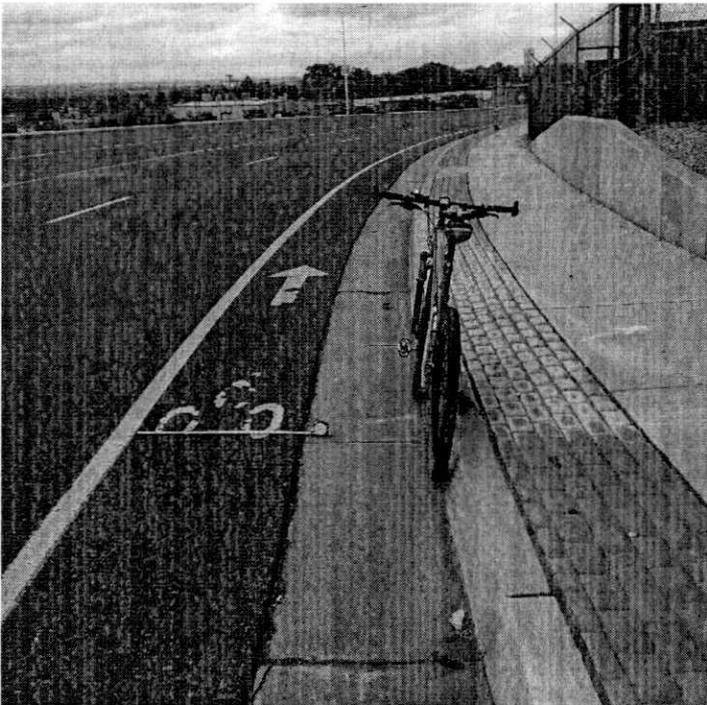
Note lane width in bicycle facility queue area



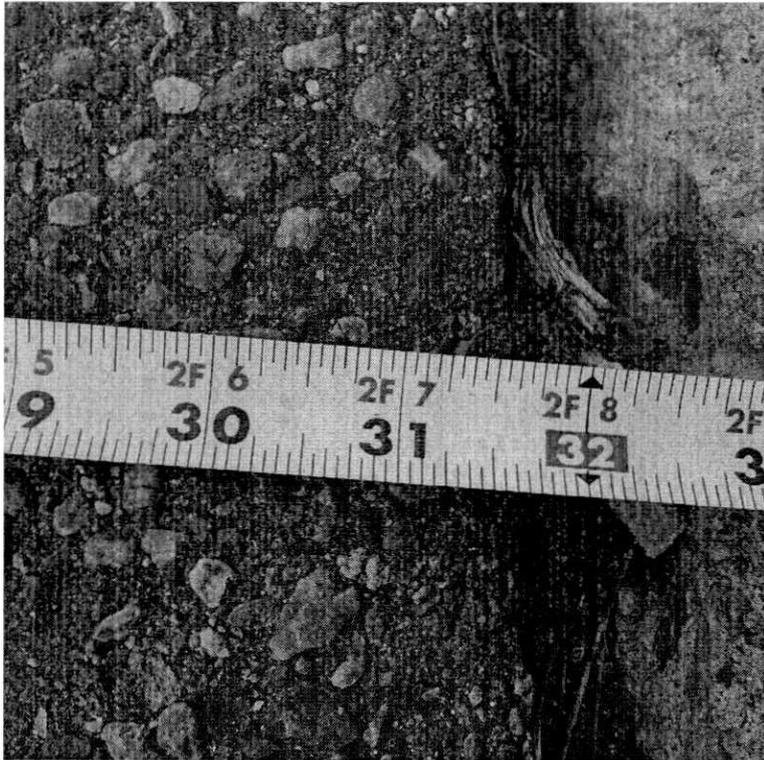
No fun. At least cyclist had wide tires and could negotiate uneven surface seams between gutterpan, curb cut and asphalt



Speed limit on Comanche West side of i-25 WB approaching Sysco. Note instinct to hug curb and ride in gutterpan



Entering WB curve. SW Facility on left. Note marking degradation and limited sight lines for approaching Malloy entrance/exit



Bike facility ~2.5'. Cyclists turning SB onto Edith need to start positioning for access to left turn bay and will be looking over shoulder to gauge oncoming traffic. Narrow bicycle lane is significant safety problem for inexperienced cyclists as they may swerve as they gauge opportunities behind them (Inadequate Operating Width for bicycles according to AASHTO and latest TRB research/recommendations).

¹ Traffic counts specifically into and out of existing SW facility at Edith not available. Significant problem with bike/ped traffic count data as one time count in December, not enough data to accurately assess existing facility usage or any improvement/deficiency if ETS is approved and constructed. User community would like to see better and more accurate pre and post construction data including conditional for more applicable study of current bicycle facility dimension and usage in this part of the Griegos/Comanche Bicycle Corridor. As mentioned above—we need to require better data on existing speeds on both corridors.

January 2, 2017

Ms. Karen Hudson, Chairwoman
Environmental Planning Commission
c/o Ms. Maggie Gould, Planner

Project #1010582, Solid Waster Transfer Station

delivered by email

Dear Ms. Hudson:

Many people are concerned about the traffic impacts of the proposed project. The LUHO, in the recommendation dated February 8, 2016, wrote 4 pages of opinion regarding traffic concerns/facts that had not been clearly addressed. The applicant has had ten months to address those concerns. Most of them have not been addressed in the new application, other than the submission of a Traffic Impact Analysis (prepared according to partial County requirements) with no approvals by City or County. I have attached a listing of issues/problems/incomplete information which should be addressed before deciding whether or not to grant a zone map amendment. I would like to emphasize item #24:

The applicant uses the amount of \$75 million saved to justify meeting the criteria of Section 1A and Section 1B of R270-1980, and Policy IIB5e, IIC3a, and IID6e of the Comprehensive Plan. However, this amount is never documented in the application. If we look at the Feasibility Study, 2014, this savings is accomplished by closing all the other convenience centers. This Traffic Impact Analysis does not address that scenario.

Is \$75 million saved a true statement? How will that be attained?

The problems with the traffic study and information provided in the applicant's letter to the EPC indicate traffic impacts to the surrounding area have not been clearly stated and analyzed. The applicant has to prove that the permissive uses will not be harmful to adjacent property, the neighborhood or the community. This has not been done and according to Section 1E of R270-1980, the request for a zone map amendment should be denied.

Sincerely,

Peggy Norton
3810 11th Street, NW
Albuquerque, NM 87107

Traffic Issues -

Application submitted to the EPC, 12/1/16, project #1010582, Solid Waste Transfer Station

1. The applicant submitted a traffic impact study form, and a traffic engineer confirmed a traffic impact study was not required. Last time, the requirement was borderline. Why the difference? What is the basis for not requiring a TIS? Wilson & Co. claims there are not enough additional trips during peak hours in am or pm. However, the LUHO, in the prior appeal, emphasized that the development's peak hour additional trips is also a criteria for requiring a TIS (p. 10). This would be when the garbage trucks return from their first load, transfer trucks are hauling off the garbage, convenience center traffic is arriving/leaving, and this is all new trips. If a TIS had been required, it would have had to meet city guidelines and been approved by traffic engineering. This did not happen with the submitted Traffic Impact Analysis. The submitted TIA was prepared by the project manager, who has a vested interest in making this project happen, and was approved by no independent party.

2. Last time, the TIS form had traffic engineering sign for receipt of a TIS. This time, there was no signature. What happened last time to the TIS? Ms. Garcia testified that they didn't submit it last time because they had submitted it to traffic engineering and hadn't addressed their comments, so it wasn't a final TIS. What were those comments? I submitted an IPRA for all comments regarding the study from 1/1/15 to current. However, the 15 day deadline is January 10, 2017.

3. This document is a TIA as required by the County. However, there is no record of the County receiving it.

4. Where will transfer trucks park at night? There doesn't appear to be area provided for this on the site plan. If they park at the landfill, they will be coming to the site during morning peak hours, assuming they need to arrive between 9 and 10 when collection trucks start returning. They will also be going to the landfill during peak evening hours. If collection trucks return to ETS between 1 and 2:30, and transfer trucks spend 2 hours going to the landfill and returning to pick up the last load, some of the trips will occur after 3, which is the beginning of the pm peak hour.

5. There are projected to be 17 transfer trucks (feasibility study 2014). Almost all of them will run 4 trips a day (8 hours of driving/loading time) to transport the project estimate of 65 loads. The 2014 feasibility study (p.2) uses 100 minutes for a trip, but that is only from the Big-I to the landfill, unloading and returning to the Big-I. Let's assume at least 20 more minutes to go from the Big-I to ETS, load, and return to the Big-I. That amounts to two hours for a trip. So when garbage is dropped at ETS, assuming it all comes in within a narrow time span, ½ the garbage will be sitting there until transfer trucks return.

6. The study does not include transfer truck trips for convenience center garbage during the week.

7. There is no documentation for the estimated convenience center traffic or its

peak hours, stated to be 9-11 and 2-4. Documentation from current convenience centers should have been included to justify the estimates and population densities should have been included to justify 30% of convenience center traffic coming to this site. The LUHO (p. 10) states it is not clear in the record if and how many additional trucks will be added to the operation and whether the public haulers are semi-truck traffic. This is still not clear.

8. Does the extra capacity of ETS allow for other trash beside City waste? The Proposed Site Operations (EPC letter, p5) states "the majority of trash comes from Bernalillo County and surrounding areas". This is not just City waste, it is Bernalillo County and beyond. This application projects 1100 T (see below, #14) per day, but the capacity allows for a surge of 2600 T. What prevents contracts with area private or public entities which would increase traffic and is not accounted for in this study?

9. The feasibility study calculates 24T per transfer truck but there is no prediction of the number of collection trucks to transfer trucks. If we use 228 loads (138 commercial, 90 residential) divided by 65 transfer trucks, there would be 3.5 garbage trucks per transfer truck. Is this a reasonable conclusion? Can it be confirmed as an expectation for the record? How is 24T calculated. USDOT allows 80,000 lb. as a maximum vehicle weight. A truck is approximately 33,000 lb. Therefore, a 47,000 lb. load would be 23.5 T. Can a load of garbage be tightly packed enough to weigh 24T? It would seem that there would be records on this from other transfer stations which could have been submitted to verify assumptions. The EPA Transfer Station Design Publication (p.274 of the public record from the last hearing) states 15-25T per transfer truck. 24T is almost the maximum. Anything less than that will require more transfer truck trips.

10. The TIA uses data from December 2013, three years old. At that time, 4th and Griegos had an LOS rating of F. A poor LOS is ok if it was poor before the project and additional trips don't result in a notable increase in delay. This would seem to be an unconfirmed subjective judgment call made by Wilson and Company, the project manager? Under the DPM (see LUHO, p. 10), the minimum standard level of service cannot be less than a LOS D on roadway elements where the level of service is controlled by traffic control devices.

11. To emphasize a statement in the Review of Traffic Impacts Study, the Bernalillo County Public Works Department requires analysis of the first major intersection in each direction from the site. These intersections were not included in the study.

12. Note that collection truck trips are within a short time span, not spread equally over the day. During a mid-day 1 ½ hour time period, we will have 200 collection truck trips, 34 transfer truck trips, convenience center trips (perhaps 50 trips). This amounts to a total of 284 trips in 90 minutes, or one every 20 seconds.

The next set of comments address statements in the letter to EPC.

Peak hours are never stated.

13. Current site operations

272 is not equal to 138 in/138 out. That would be 276 trips to the landfill. Using 54 collection trucks, this could be accomplished by 24 trucks doing 2 loads (4 trips), and 30 trucks doing 3 loads (6 trips). This amounts to an increase to the ETS site of 168 trips, assuming there are currently 108 trips (54 out/54 in).

14. Proposed site operations, 1st paragraph – 1100 T. If 404,000T per year are anticipated, 52 weeks in a year, 5 days in a week, that would be 1,553 T per day. While a small amount comes in on Saturday and Sunday from collection trucks, it is inaccurate to spread the total annual garbage over 7 days in a week.

15. Proposed commercial trucks – Where does 208 come from? It is still not clear and this was a question in the LUHO decision (p. 9).

16. Transfer trucks, 130 trips, all new.

17. Convenience center, as noted above, provides no documentation for the number of vehicles. No transfer trucks are included for weekday convenience center garbage. Who can be considered public self-haulers (see LUHO, p. 10)?

18. Traffic impact

How is the 653 total new trips calculated? Correcting the submitted numbers results in an increase of 90 residential collection trucks, 168 commercial collection trucks, 450 convenience center vehicles, 130 transfer trucks = 838, or a 5.07% increase daily. However, percents don't adequately measure the increase of impact due to vehicle types or that the trip increases will be in surges. The impact of the increase of one semi-truck is not equal to the impact of the increase of one small compact car. Current truck trips on site are 198 (90 + 108). The proposed operations estimate the truck trips to be 586 (180 (residential) + 276 (commercial) + 130 (transfer). Even though this does not include transfer trucks for the convenience center, it represents an increase in on-site truck traffic of 196%, nearly three times what it is currently.

19. There is no impact to intersections because the new trips are primarily outside am and pm peak hours. This is not true. Convenience center traffic will be in the peak hours, both from 8 – 9:30 am and from 3 – 5 pm. If collection trucks do not return until after 9:30 am, then transfer truck trips will occur in the pm peak hours, since it takes 8 hours to deliver all garbage to the landfill. Note also that if transfer trucks are stored overnight at the landfill, they will be traveling in the am peak hour. In any case, they will be traveling in the pm peak hours, either out to the landfill or round trip. Collection trucks doing routes to the west, northwest, and southwest of the site may be traveling through the intersections during am peak hours when returning to the site.

20. The LOS of 4th and Griegos is F. The statement “no new truck traffic will go through this intersection nor any residential neighborhoods” needs verification. It would seem that truck routes currently using 12th Street and Rio Grande Blvd. to travel to the landfill would now use Griegos to return to the site, increasing traffic at

the indicated intersection, as well as others that have an LOS of D. Additionally, Griegos narrows to a two lane road east of 2nd Street.

21. On-site truck storage - nothing for transfer trucks.

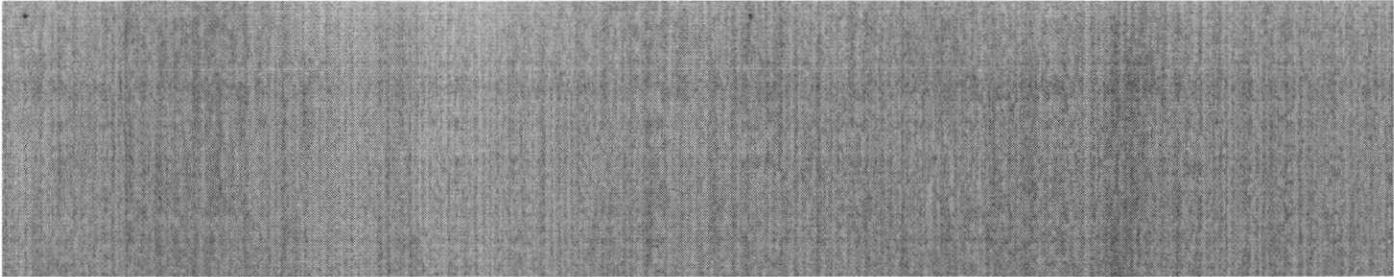
Additional concerns with respect to the TIA report - September 2015

22. Doesn't account for additional transport of increased recycling (by people using convenience center) and household hazardous waste.

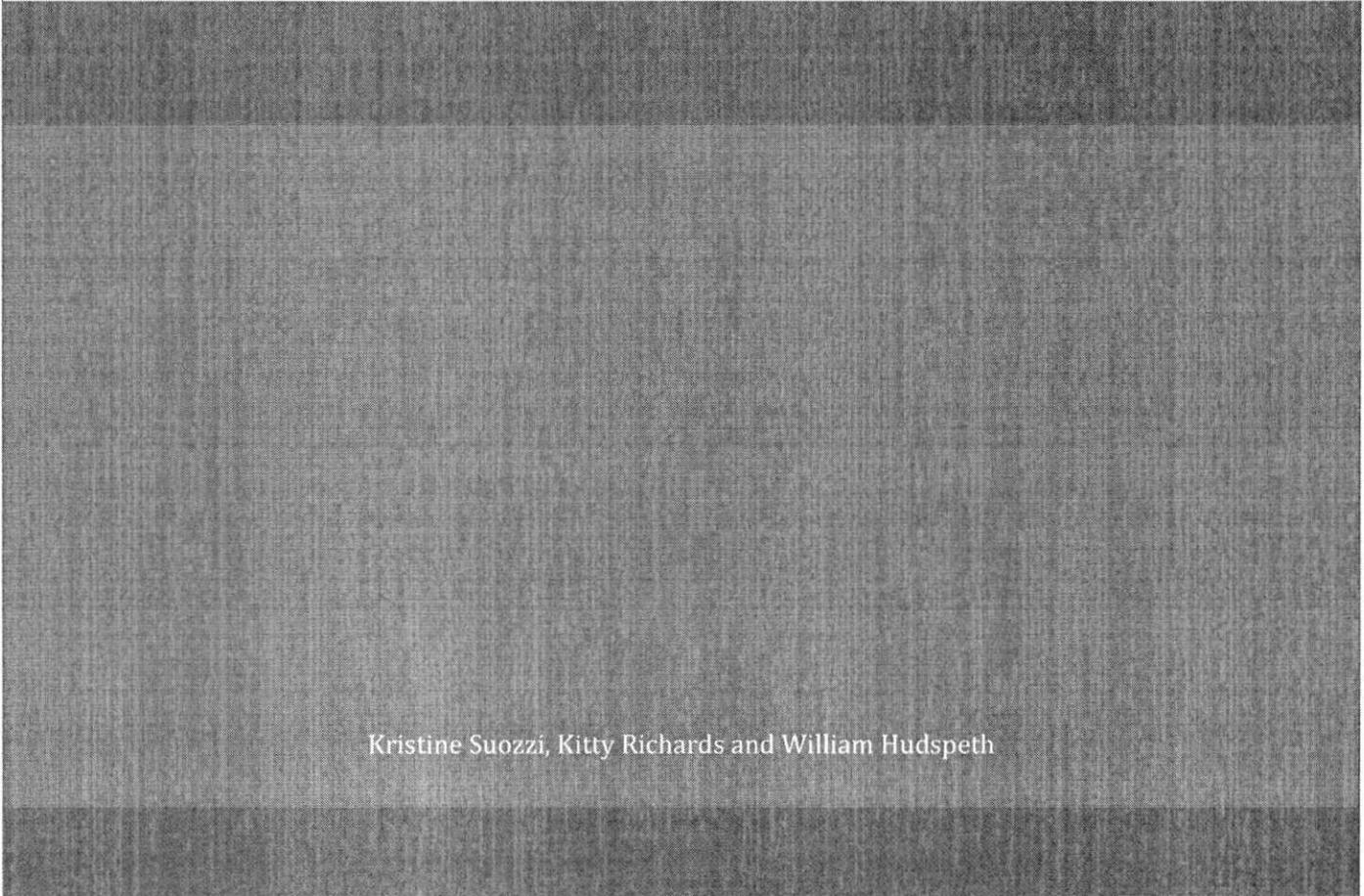
23. Big multi-dwelling apartment projects in the area, both new and unplanned, are not accounted for.

24. The applicant uses the amount of \$75 million saved to justify meeting the criteria of Section 1A and Section 1B of R270-1980, and Policy IIB5e, IIC3a, and IID6e of the Comprehensive Plan. However, they never document this amount. If we look at the Feasibility Study, 2014, this savings is accomplished, but only by closing all the other convenience centers. This Traffic Impact Analysis does not address that scenario.

Collection truck - garbage truck
transfer truck - semi truck (18-wheeler)
load - one truck load
trip - one trip, either in or out



NORTH VALLEY COALITION
HEALTH IMPACT ASSESSMENT
EXECUTIVE SUMMARY
FOR
EDITH TRANSFER STATION



Kristine Suozzi, Kitty Richards and William Hudspeth

January 3, 2017

Environmental Planning Commission
Karen Hudson, Chair
C/O Maggie Gould, Planner
1 Civic Plaza
Albuquerque, New Mexico 87107

RE: Project No. 1010582, 4600 Edith Blvd. NE.

Dear Chairman Hudson and Members of the EPC:

Please accept this cover letter and attachments for the record in case 1010582, the request for a zone change for the proposed Edith Transfer Station. Together the three primary authors of the North Valley Proposed Edith Transfer Station Health Impact Assessment (NV HIA) have two doctorates, five masters' degrees, over fifty years of public and environmental health experience, and have conducted over eight HIA's in New Mexico.

To assure that there was no reporting bias and that there was strict adherence to the North American HIA Practice Standards, the NV HIA was peer reviewed. Peer reviewers included two Doctorates of Public Health and two physicians, one of whom is an internationally recognized expert in health impact assessment practices. These peer reviewers concurred that the NV HIA followed all of the HIA standards and that the findings and recommendation are sound and should be adhered to.

In July of 2015, working in collaboration with the North Valley Health Impact Assessment Committee and the North Valley Coalition of Neighborhood Associations, the NV HIA on the Proposed Edith Transfer Station was submitted. This HIA demonstrates that the proposed Edith Transfer Station is not in the best interest of the surrounding community and further that it is in conflict with the 1993 North Valley Area Plan, the 2015 Complete Streets Ordinance, the CABQ Comprehensive Plan, and that conditions A, B, C D (1), (2), (3), E (1&2) in Enactment 270-1980 were not met. Proponents for the facility state that the facility "furthers" the policies in all of these plans, but fails to state how.

The HIA process was open to anyone interested in participating. We have heard that proponents for the facility argue that they were excluded from the HIA process. They were present at our first meeting and invited along with everyone else to sign up to be on the HIA Committee. All aspects of the HIA process were transparent and agendas for each meeting were sent out in advance and minutes were sent out after each two-hour bi-monthly meeting for just over a year that the NV HIA Committee was convened.

While some say that the area in question is an industrial area where no one lives, the 18,000 residents who live within two miles of the proposed facility would argue that this is grossly incorrect. This is an environmental justice community that is predominantly minority (64.6% compared to 46.5% for the rest of Albuquerque) and low income (35.6% compared to 24.6% for the rest of Albuquerque). The area is currently part of a Environmental Protection Agency investigation of violation of Title Six of the 1964 Civil Rights Act by the City of Albuquerque Air Quality Division and Air Quality Board.

Some of the criticisms of the HIA include that the proposed use is permissive per M-1 zone; LUHO and City Council have demonstrated that it is clearly not. We've heard that it there would not be a significant increase in traffic; our independent traffic study demonstrated that there would be a 173% increase in traffic near the facility.

The HIA never stated a causal relationship between exposures and health outcomes, but rather pointed out the associations between increases in exposure and potential increases in adverse health outcomes. For example, many peer-reviewed, scientific studies have pointed out the relationship between exposure to diesel fumes and increases in asthma and other respiratory illnesses.

Finally, it has been claimed that the proposed Edith Transfer facility through engineering and design methods would be able to mitigate or eliminate any potential harms that a transfer station might pose. While this may be true within the proposed enclosed building, it would not be true in the ingress or egress to the facility or in the adjacent communities. These communities would be subjected to the increases in traffic, the increases in diesel fumes, the increases in litter, rodents, insects and noise, the degradation of overall community health and well-being and decrease in economic stability.

Thank you for your attention to this letter and your review of documents.

Sincerely,

Kristine Olson Suozzi, Ph.D.

Referenced Documents:

1. North Valley Health Impact Assessment of the Proposed Edith Transfer Station
2. Review of Traffic Impacts from the Proposed Waste Transfer Station in Albuquerque, New Mexico, by Sustainable Systems.
3. Economic analysis of solid waste facility at 4600 Edith NE by Kelly O'Donnell.

So, what is a *Health Impact Assessment* anyway?

The International Association of Impact Assessment defines Health Impact Assessment (HIA) as “a combination of procedures, methods and tools that systematically judges the potential, and sometimes unintended, effects of a policy, plan, program or project on the health of a population and the distribution of those effects within the population. HIA identifies appropriate actions to manage those effects.” (Quigley, 2006)

HIA aims to make the health impacts of public decisions explicit. To do this HIA uses diverse methods and tools and engages health experts, decision-makers, and stakeholders including those with local knowledge to identify and characterize health effects resulting from a proposal and its alternatives (Quigley , 2006).

HIA is concerned with harmful effects and also with the ways public decisions can be shaped to promote and improve a population’s health. HIA is also explicitly concerned with vulnerable populations and includes analysis of a proposal’s impacts on health inequities.

HIA draws upon diverse sources of knowledge including lay and professional expertise and experience. HIA also offers recommendations to decision-makers for alternatives or improvements that enhance the positive health impacts and eliminate, reduce, or mitigate the potential negative impacts of a proposed policy, project or plan.

HIA does not endorse or oppose a project or policy; rather, HIA’s inform stakeholders and decision-makers about the health implications of a proposal. Democracy, participation, equity, and the ethical use of evidence are key values underlying HIA practice (Quigley 2006). Using public health as a shared value, HIA can encourage cooperation among stakeholders with potentially divergent interests.

**North Valley Health Impact Assessment
of the
Proposed Edith Transfer Station**

**Prepared By William Hudspeth, Kitty Richards¹, and Kristine Suozzi
In Collaboration With
The North Valley Health Impact Assessment Committee**

EXECUTIVE SUMMARY

Background

After learning about the City of Albuquerque's (COA) plans to construct a Waste Transfer Station (WTS), the Board of the North Valley Coalition (Coalition) voted to request that experienced health professionals, in partnership with interested residents and businesses, conduct a Health Impact Assessment (HIA) on the proposed Edith Transfer Station (Edith Station). HIAs are tools to help policy makers understand the impacts that a policy, plan or project can have on the community's health prior to making a decision. This summary provides background information on the proposed Edith Station, the impacted community, and the zone change process, along with HIA findings and recommendations.

The COA is proposing to build a WTS on the 22-acre site of its current Solid Waste Department (SWD) facility located on the west side of I-25 at the corner of Comanche Rd. and Edith Blvd. NE (4600 Edith Blvd.). In addition to the WTS—a 75,000 square-foot building that will also house a convenience center—the COA also plans to construct a household hazardous waste drop-off center (2,000 sq. ft.), a re-use center (4,200 sq. ft.), a recycling drop-off center (5,000 sq. ft.), a vehicle maintenance yard (40,000 sq. ft.), and SWD administrative offices (15,000 sq. ft.). The COA will maintain their current fueling station (Edith Station Fact Sheet).

If constructed, COA garbage trucks would no longer drive back and forth to the Cerro Colorado Landfill to dump their municipal waste loads, but would instead dump their loads at the Edith Station. As proposed, after dumping their loads onto the tipping floor, waste would be transferred to 18-wheeler semi-trucks that would transport the waste to the Cerro Colorado Landfill. Based on 2011 and 2012 annual waste volume estimates, each year 368,115 tons to 383,956 tons of waste, equivalent to 2 million to 2.1 million pounds of waste per day, would be dumped at the Edith Station for transport by semi-trucks to the Cerro Colorado Landfill.

Combined, these heavy trucks (including semi-trucks) would make a minimum of 229 additional round trips into and out of the Edith Station and the impacted community each weekday. This is a 173% increase from current round trips made (132) by SWD's heavy truck fleet. Heavy trucks would make a total of 361 round trips into and out of the Edith Station and the impacted community each weekday.

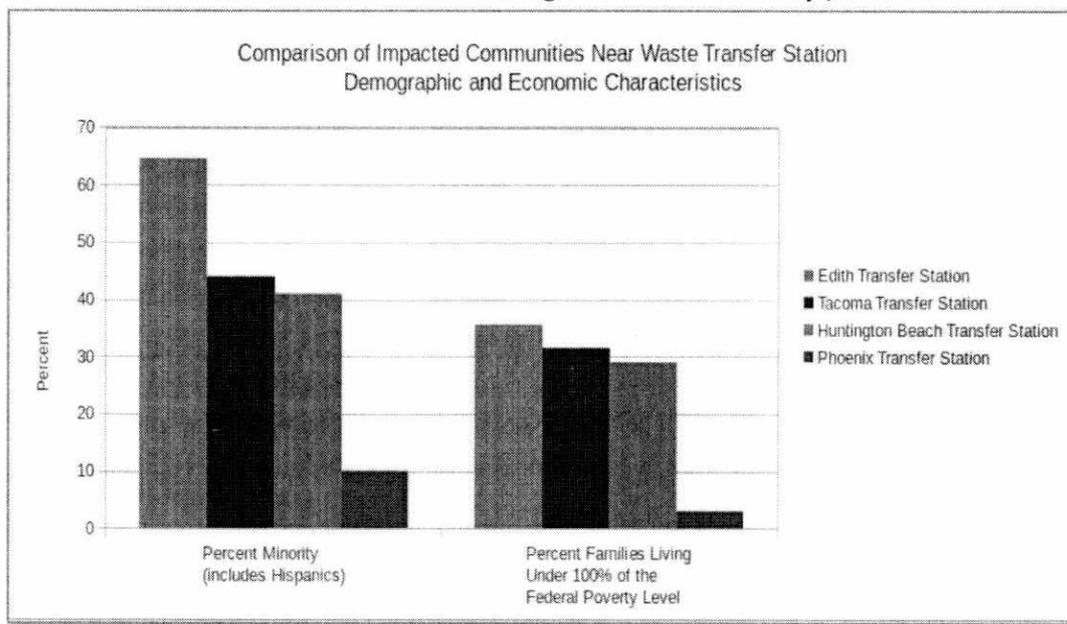
¹ Owner, Healthy Places Consulting, LLC

These round trips do not include the privately owned vehicles that will be self-hauling trash to the Edith Station's Convenience Center. The COA estimates that the Edith Station convenience center will receive 225 round trips made by private self-haul vehicles each weekday and 300 round trips each Saturday and Sunday. Data from the Mid-Region Council of Governments (MRCOG) shows portions of the road infrastructure surrounding the proposed Edith Station site to be already severely congested.

Environmental Justice Community

Those living closest to the proposed Edith Station site, and the most likely to be adversely affected, are from the Greater Gardner and Stronghurst communities. Together, these communities are predominantly Hispanic (64.6%) and low-income, with 35.6% of families living below the Federal Poverty Level. As a comparison, the remainder of Bernalillo County's Hispanic population is 46.5%, with 24.6% living below the Federal Poverty Level. Compared to the location of WTSs designed or constructed in other communities by the City's contractor JR Miller, the census tracts adjacent to the Edith Station have more minority and low-income populations (Figure 1).

Figure 1. Socio-economic and demographic characteristics of census tracts adjacent to the Edith Station and other transfer stations designed or constructed by JR Miller.



Due to the historical pattern of siting many WTSs in low-income and minority communities, the United States Environmental Protection Agency (EPA) has emphasized the necessity for municipalities to include the meaningful input of impacted communities in the development of siting criteria and site selection processes prior to making decisions (USEPA, 2002).

Although one would anticipate that a Feasibility Study would include criteria for the selection of an appropriate WTS site, as well as a comparison of costs and benefits for various sites as required by the North Valley Area Plan, the 2011 Feasibility Study and the 2014 Update only considered one site—the site of the current SWD facility.

Requirements to Change Zoning from M-1 Zone to Special Use Prior to constructing the proposed Edith Station, the COA which in this case is the applicant, must first go through several processes, including a request before the Environmental Planning Commission (EPC) for a zone change from the current M-1 zone, which prohibits a WTS, to a Special Use Zone.

As part of the EPC hearing, the burden of evidence is placed on the applicant to demonstrate that all conditions of Enactment 270-1980 have been met. The majority of these conditions consider the impact of a zone change to Special Use on the community's health, safety, and general welfare. Particularly significant is the language stating that, "a change of zone shall not be approved where some of the permissive uses in the zone would be harmful to adjacent property, the neighborhood, or the community."

Based on HIA findings, the proposed Edith Station would harm, rather than benefit, the adjacent community. Further, after reviewing relevant policies covering the impacted community, designated as the *Central Urban Area* in the Albuquerque Bernalillo County Comprehensive Plan, the NV HIA Committee concludes that the proposed Edith Station is in conflict with the:

1. 1993 North Valley Area Plan.
2. Recently adopted 2015 Complete Streets Ordinance.
3. Comprehensive Plan's *Established Urban Area* and *Central Urban Area* goals and policies, as well as other Comprehensive Plan policies protective of human health, as follows:
 - a. To create a quality urban environment which perpetuates the tradition of identifiable, individual but integrated communities within the metropolitan area and which offer variety and maximum choice in housing, transportation, work areas, and life styles, while creating a visually pleasing built environment (*Established Urban Area Land Use Designation*).
 - b. To promote the *Central Urban Area* as a focus for arts, cultural, and public facilities/activities while recognizing and enhancing the character of its residential neighborhoods and its importance as the historic center of the City (*Central Urban Area Land Use Designation*).
 - c. To protect, reuse, or enhance significant historic districts and buildings.
 - d. To protect the public health and welfare and enhance the quality of life by reducing noise and by preventing new land-use/noise conflicts.

Health Impact Assessment Findings

Traffic

Increased vehicle volumes have been shown to be associated with increased chronic disease, motor vehicle related accidents, and lower life expectancy. Table 1 shows the chronic disease death rates, motor vehicle related death rates, and life expectancy for non-Hispanic white and Hispanic residents of Bernalillo County and the impacted community.

As mentioned previously, the impacted community is quite different from other communities in Bernalillo County in terms of demographics and socio-economic status. The impacted community is largely low-income, with 35.6% of families living below the Federal Poverty Level and Hispanic (64.6%). Research shows that the lack of traffic safety disproportionately affects low-income and minority neighborhoods (Roberts et al., 1995; Cottrill et al., 2010).

Similar to other low-income and minority neighborhoods in the country, the impacted community’s Hispanic population bears a much greater health burden associated with traffic volumes and traffic safety (bolded numbers in Table 1). With the addition of more heavy truck and vehicle volumes generated by the Edith Station, and the absence of necessary transportation infrastructure improvements, the disproportionate health impacts among Hispanics living in the impacted community will continue.

Table 1. Deaths associated with increased vehicle volumes for Bernalillo County and the impacted community.

| Place | Chronic Disease Death Rate (Age-adjusted Death Rate per 100,000 persons, 2008-2011) | | Motor Vehicle Related Death Rate (Age-Adjusted Death Rate per 100,000 persons, 2008-2011) | | Life Expectancy from Birth (2011) | |
|--------------------|---|--------------|---|-------------|-----------------------------------|-------------|
| | Non-Hispanic White | Hispanic | Non-Hispanic White | Hispanic | Non-Hispanic White | Hispanic |
| Bernalillo County | 207.3 | 220.4 | 8.3 | 11.4 | 80.1 | 78.6 |
| Impacted Community | 104.5 | 455.6 | 5.9 | 12.0 | 89.6 | 73.7 |

Assuming that volumes of pedestrians and bicyclists do not change, the predicted increase in vehicles using the Edith Station’s Convenience Center, and heavy trucks travelling into and out of the Edith Station and the impacted community, will likely result in an increased frequency of vehicle-pedestrian/bicycle collisions, which will

be disproportionately severe when the vehicle involved is a truck.

Local Surface Temperatures, Water Quality, and Flooding

The Edith Station is likely to contribute to higher localized surface temperatures, particularly if metal is used for buildings and rooftops, and if planted vegetation is typical of desert landscape, which provides little, if any, natural shading.

According to the EPA, the assessment unit for the reach of the Rio Grande where the Alameda Lateral flows into the Rio Grande (NM-2105_50) is impaired for dissolved oxygen, e. Coli (fecal matter), PCBs in fish tissue, and temperature.

The Edith Station will likely further impair ground water and surface water quality simply because of the more intense land use for this property—from administration offices, a vehicle storage facility and maintenance shop, and fueling station to a full-fledged WTS that will also house a convenience center, a household hazardous waste drop-off center, a re-use center, a recycling drop-off center, and a vehicle maintenance yard. Further, an increase in the SWD fleet, to include semi-trucks, will contribute to increased air emissions that will eventually settle onto the ground's surface, increased wastewater discharges to the antiquated sewer system, and an increased likelihood of unanticipated spills occurring during routine vehicle maintenance.

Since the Edith Station site and surrounding area is predominantly covered by pavement and concrete, it is largely an impervious area. Therefore, depending on the duration and severity of a rainfall event, flash flooding is likely to occur in communities that are located down gradient of the site. Flash flood events negatively affect commercial and residential buildings through water damage that contributes to the growth of mold spores indoors and the presence of vectors in post-flood outdoor areas having stagnant water.

Air Quality

The impacted community is over-burdened with industry and air pollution. One hundred and five out of 694 facilities permitted to emit air pollutants in Bernalillo County are located within a 2-mile radius of the impacted community.

Residents of the impacted community were exposed to high levels of sulfur dioxide, ozone, particulate matter 2.5 and particulate matter 10 on numerous dates during 2014. Increased concentrations of air pollutants in the impacted community may result in higher rates of cancers and chronic diseases (respiratory diseases, cardiovascular diseases, and strokes), as well as health conditions associated with high stress such as migraines.

Noise and Other Nuisances

Baseline noise measurements in the impacted community currently exceed COA standards as established by ordinance. Noise is associated with a host of negative health outcomes, including sleep disturbance, hearing impairment, learning

difficulties, decreases in work performance, heart disease and increased stress hormones.

The nine public schools within two miles of the proposed Edith Station have a combined enrollment of 4,833 students, many of whom are under-achieving; the impact of noise would further hinder their academic achievement.

Research shows that communities affected by the storage, removal, transport, processing, or disposal of solid waste have a greater likelihood of nuisance-related problems such as increases in odors, litter, and pests that serve as vectors for infectious diseases, such as West Nile Virus.

Economic Wellbeing of the Historical Neighborhood, Residents, and Businesses

Based on economic studies of residential property values near other WTSs, property values in the impacted community are expected to fall in proportion to their proximity to the proposed Edith Station.

Businesses in the impacted community fear that the increase in traffic will adversely impact their ability to access their properties, conduct business, maintain employee health, and meet freight delivery deadlines.

Unless preventive measures are introduced, vibrations caused by increased truck traffic could contribute to the deterioration of the two historical properties located close to the proposed Edith Station site. Further, increases in surface water runoff could impair the structural integrity of the historic Alameda Lateral. The loss of historical structures could contribute to a loss of tourism generated revenue and neighborhood identity.

Health Impact Assessment Recommendations

The NV HIA Committee recommends that the Edith Station should neither be approved nor constructed, as the COA has failed to address concerns validated in the above findings. The proposed Edith Station would pose increased health and economic stresses on an already over-burdened low-income, minority community and would not be consistent with the health, safety, and general welfare of the Albuquerque metropolitan area or the impacted community.

The mitigation required to protect the health and safety of residents and businesses within the impacted community is both necessary and costly. Through their failure to incorporate **all** costs into their feasibility analysis, the COA has underestimated their costs and overestimated their savings and public benefits.

January 2, 2017

Re: Project #1010582

Dear Mr Nicholls and the Environmental Planning Commission,

I greatly appreciate the opportunity to again share my thoughts on the proposal to construct a Waste Transfer Station (WTS) at 4600 Edith Blvd, NE. Thank you for your consideration.

As a family physician providing primary care for the Albuquerque community for the past 33 years I am very concerned that my patients and your constituents have the ability to live, work, learn and play in a healthy environment. I have learned the vital lesson that this is essential for achieving the best possible health. I am currently caring for patients at the UNM Center for Family & Community Health at 3401 4th St NW and am very concerned about the impact of the Waste Transfer Station.

In my previous comments I shared concerns about negative impacts on **motor vehicle, bicycle and pedestrian safety, increased exposure to noise, litter, odor, rodents and insects and deterioration of roadways and buildings due to vibrations**. I am still concerned about these issues.

Today I would like to focus on the negative effect of the WTS on air quality especially in light of the goals outlined in the Albuquerque/Bernalillo County Comprehensive Plan (as amended 2002). There are three specific goals of the plan in Section IC (Environmental Protection and Heritage Conservation) that I feel are at risk if the WTS is approved.

1. **Policy g (II-47): Pollution from particulates shall be minimized.**
2. **Policy I (II-48): Air quality considerations shall be integrated into zoning and land use decisions to prevent new air quality/land use conflicts.**
3. **Policy k (II-49): Citizens shall be protected from toxic air emissions.**

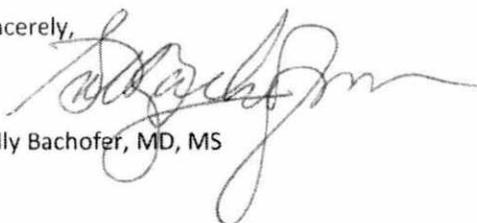
It is critical that you recognize that these goals for environmental protection must be interpreted and applied to **this specific community**. It is inaccurate and irresponsible to rely on statements and predictions about "overall air quality" when the people of this community will be exposed to localized increases in particulate matter and diesel exhaust. It is well documented in the medical literature that particulates and diesel exhaust are associated with increases in poor health from asthma, lung cancer, heart disease, strokes and even gestational diabetes in pregnant women. It is unconscionable to intentionally impose poorer air quality on a specific community.

Given the prospect of targeting this community with increased risk, I continue to be bothered by locating this facility in an area of town which already struggles with a disproportionate burden of poor health, excess injuries, low income and limited education. Building the Edith WTS will further reduce the potential for these families to achieve the best possible health.

This proposed Waste Transfer Station causes too many concerns, creates too many risks and jeopardizes the health of too many members of our community. As a health professional and a resident of Albuquerque, I once again urge you not to approve this proposal.

Thank you for your time and consideration.

Sincerely,



Sally Bachofer, MD, MS

January 3, 2017

Karen Hudson, Chair, Environmental Planning Commission
c/o. Maggie Gould
City of Albuquerque Planning Department
1 Civic Plaza
Albuquerque, NM 87102
RE: Project# 1010582, 4600 Edith Blvd NE

Dear Ms. Hudson and Members of the Environmental Planning Commission,
Please accept this letter for the record in project 1010582. My name is Dr. Kristine Suozzi. I have worked in public health for over thirty years and was the Director of the New Mexico Department of Health /Public Health Division during the Richardson Administration. I have been professionally trained in conducting health impact assessments and have worked on five Health Impact Assessments.

Through my doctoral studies and my extensive experience in public health, I have some professional expertise that I'd like to share. One of the primary jobs in public health is to keep healthy people healthy. For that reason, we wrote and enacted the Clean Indoor Air Act, the seat belt ordinance, and work to keep tobacco and alcohol products away from young people. We know that these acts are harmful. We also know that providing early childhood immunizations protects young people from life threatening infectious diseases. We all know that the potential risks associated with proximity to a transfer station are innumerable and include asthma and upper respiratory illnesses, cardiovascular diseases and diabetes. It is also why I am here today to reinforce for you the potential physical and mental health, and economic stressors in placing a transfer station in proximity to where people live, attend school, and are in care facilities. It is even potentially more harmful in a community already over-burdened with environmental toxins.

As you are aware, the area around the proposed Edith Transfer Station is an environmental justice community that is predominantly minority (64.6% compared to 46.5% for the rest of Albuquerque) and low income (35.6% compared to 24.6% for the rest of Albuquerque). The area is currently part of a national Environmental Protection Agency investigation of violation of Title Six of the 1964 Civil Rights Act by the City of Albuquerque Environmental Health Department due to the disproportionate burden of environmental toxins being placed in low-income communities of color in Albuquerque. It would be a faulty decision to consider adding even more environmental burdens to this community.

Finally, as enumerated in the HIA, this proposed Edith Transfer Station is not in the best interest of the surrounding community for a variety of reasons. Further, we have shown that the proposed Edith Transfer Station is in conflict with the 1993 North Valley Area Plan, the 2015 Complete Streets Ordinance, the CABQ Comprehensive Plan, and that conditions A, B, C D (1), (2), (3), E (1&2) in Enactment 270-1980 were not met.

As Dr Rajiv Bhatia, one of the HIAs peer reviewers and a national expert on HIA practices suggested, the CABQ would be wise to give serious consideration to the simple messages of potential harm of the proposed Edith Transfer Station outlined in the HIA and to provide alternatives that might avoid or mitigate the concerns presented.

Thank you for your attention to this letter.
Warmly,
Kristine Suozzi, Ph.D.

Gould, Maggie S.

From: Jen Parker <jen.bookworm@gmail.com>
Sent: Sunday, January 01, 2017 8:39 PM
To: Gould, Maggie S.
Subject: Project # 1010582 Edith Transfer Station Project
Attachments: Jen Parker Project#1010582 Edith Transfer Station Project.pdf

I want to voice my continued opposition to the proposed Edith Transfer station and my disappointment with the City's handling of this process. I am an accidental activist. I have lived two miles west of the project for 13 years. As an at home Mom, I drove past the proposed site innumerable times, driving carpools for school, sports, family outings, teaching my kids to drive and finally being a passenger with them. During this 13 year period, I have found Comanche to be a road on which I need to pay extreme attention while driving, as drivers speed, cut ahead at unsafe parts of the road, the road curves, there are railroad tracks and intersections.

I wrote my first letter in April of 2015, the same day that I learned about this proposed project, citing serious concerns about the location.

My concerns about the location include harm to the neighborhood and community. Specifically:

R-270-1980

(E). A Change of zone shall not be approved where some of the permissive uses in the zone would be harmful to adjacent property, the neighborhood, or the community.

1. The Comanche exits from I-25 are small, not easily navigated and are currently dangerous to maneuver with cars, motorcycles, trucks large and small and bicycles.

2. Comanche is a sharply curving road. This is particularly a problem, as motorcyclists, drivers of pick up trucks, industrial trucks and large trucks as well as bicyclists drive east and west, sometimes at high speeds and unsafely. In addition, just west of the proposed site, the road suddenly narrows and soon after crosses over railroad tracks.

3. Turning left into the Waste Management complex from Comanche is difficult because of:

Oncoming traffic

The curvy nature of the road doesn't allow for adequate notice of turns

There is no signal light or required stopping from the signal just west of I-25 until Edith and Comanche.

4. Queuing could be very dangerous for the same reasons as turning.

Because of these locational and traffic realities, I believe the City is bringing upon this neighborhood and the many areas that use this as a through street to the interstate, such as Dietz Farms and neighborhoods off of Comanche/Griegos and Rio Grande Blvd, a hazardous driving environment.

I believe this is patently unfair and harmful to the neighborhood it abuts:

1. Currently Waste Management parks their trash trucks at the site. As I understand it, they would leave in the am, return with loads of trash to dump, go out again and return at least one more time. While the numbers of trips have been disputed, there is no disputing that

this is at least doubling the current trips, including trash being on board, dumped and drivers understandably rushing to make their schedules.

2. Children are at real risk of harm:

The proposed project is near:

Schools (including La Luz Elementary, a couple of blocks west)

Bernalillo County's North Valley Little League is a half a block away on Edith

New Mexico has its Camino Nuevo Youth Center about a block away

New housing has been built on Comanche/Griegos and 4th Streets. This would seem to imply that this is a more residential area. This seems incompatible with the waste transfer/convenience center/hazardous waste drop off site that Waste Management is seeking a zone change for.

Antoinette Vigil
215 San Andres Ave NW
Albuquerque, NM 87107

December 30, 2016

Members of EPC Board
Planning Department
600 Second Street NW
Albuquerque, NM 87102

Reference Project # 1010582

Dear Members of EPC Board,

I am a third generation resident of our city and of the North Valley and I am writing to express my concerns about the ongoing Edith Transfer Station project and zone change application that has been submitted for your review once more. My Hispanic family has lived within 1.3 miles of the proposed location for over 50 years. My aunt lives down the street off Griegos. My uncle and his grandchildren and great grandchildren live just west of the railroad tracks on Carlton and Griegos. My mother lives within 1 mile of the SWD, as do I. My 2nd and 3rd cousins are infants to young adults in their twenties. Of my family, they live the closest, on Carlton St and on Pleasant Ave and they have asthma. Their grandfather, my uncle has emphysema and is on continuous oxygen. The board may choose to see this application from the industrial view point of Edith and Comanche but what I see is the residential side of Griegos and 2nd St...all less than mile as the wind blows or less than 1.3 street travel miles from the project site. I am invested in my neighborhood, my community and my city. I am deeply upset and worried about this project happening.

My neighborhood bears the burden of this high intensity project in many ways. However, the increase of collection truck trips and addition of transfer trucks is concerning but more so are the citizen vehicles that will be traveling from all points on the map to come to the Valley to dump their household hazardous waste and self-haul trash. They will not be limited to the direction or streets they can use to access this site, leaving behind their vehicle pollution and traffic jams with increased volume in my neighborhood. The Comanche/Griegos exit and path, heading west across the river, is quickly becoming an alternative route when there is an accident or traffic jam on I-40. I experience it more so now with the Central construction due to ART project. It is becoming difficult to get home with backups on 4th street because of those trying to cross the river without adding increased traffic with this trash transfer station.

Not only do I have to breathe in the fumes from these vehicles, but I have the added concern of the hazardous waste being driven past my home to be stored at the facility for unknown lengths of time. My family's health and property has already suffered from the area industry like Holley

Asphalt and GCC Cement Company. Now we will have to deal with trash collection trucks and increased car emissions outside our door and in our homes during the summer months or anytime we open our windows and doors to get fresh air. The fact that the application does not take into account this increased citizen traffic shows that the applicant has not done due diligence in conducting a Traffic Impact Study nor a Health Impact Study of their own. The applicant uses cost savings as reasoning for meeting R-270-1980 policy as shown on page 12 of Wilson & Company application letter dated 12/1/16, section A and B. Also in the City's Albuquerque Transfer Station Feasibility Analysis, page 17, it states:

If SWD were to redevelop the entire property and build a new office and maintenance center complex the additional capital expense is estimated to be \$12.4 million. When this is added to the cost of the transfer station and amortized over the same period the potential cost savings is estimated to be \$109 million, if all three convenience centers are closed. This scenario does not reflect directly on the feasibility of building or not building the new transfer station but it (sic) does show the impact of building the new facilities if constructed and financed over the same period.

My greatest fear is that the City will do just that and close the other 3 convenience centers siting cost savings and I-25 location as reasons to further burden me and my neighbors with a project that proposes to bring all of the City's waste and other areas to my fragile neighborhood.

One area of the city should not have to hold more industry than any other part of the city. The convenience centers were placed where they are to be convenient to those areas. By concentrating so many uses in one facility in an already overburdened community is NOT meeting R-270-1980 section A which states "A proposed zone change must be found to be consistent with the health, safety, morals, and general welfare of the City."

Already the Applicant is ignoring those that live next door to the SWD site. The residences on the Southeast corner of Edith and Rankin Rd NE are less than 500 feet from the SWD property as seen in the Google Map of 4600 Edith NE attachment #1.

On page 15 of Wilson & Company application letter, section quoting Policy II.B.5e., II.B.5i and II.B.5k demonstrate that the applicant simply ignores the existence of these homes on the same block they occupy.

Please consider that there are families like mine who have lived in this specific part of the North Valley for generations and that this project is harmful to me and them and the city at large.

Sincerely,

Antoinette Vigil

Attachment #1

There are 6 apartments that sit on the Southeast corner of Edith and Rankin Rd NE. The building with the blue rolling trash carts to the east of these apartments are on SWD property. That is less than 500 yard from SWD property. If you google map the SWD address, the apartments are mislabeled Engine & Performance Warehouse, thus giving the impression that there are no residences in the immediate vicinity. However, this is not the case and if you were looking at google map, you simply have to do a Street View browse to see that this corner property is not a business but 6 apartments, which means residences.



EPC c/o
Ms. Maggie Gould,
Planning Department,
600 Second Street, NW,
Albuquerque, NM 87102
In reference to project # 1010582

December 28, 2016

To members of the Environmental Planning Commission:

The less money you have, to buffer yourself in a gated community, the more exposed you are to varying degrees of environmental hazards. If we have the courage to be honest about what we all can see, Albuquerque has environmental justice issues.

M-1, light manufacturing neighborhoods, like where the Edith Transfer Station is proposed, are peppered with low income residential properties. There's a "discount" for living around environmental hazards. If Albuquerque's comprehensive plan is genuinely intended to be a vision for our **collective urban** future, there are many reasons for not putting one giant urban transfer station in the middle of the historic North Valley. I wonder if "disposable" applies more to people and neighborhoods than to garbage.

There is an elementary school, a little league field and a youth detention center all within walking distance of the proposed site. There are also residences, businesses, Sysco foods with diesel trucks running for hours every day, a cement processing plant which pollutes the air, to name a few the neighborhood residents.

I understand the location at Edith and Comanche was not the first choice.

Please consider locating it where it will have less impact on the lives of citizens.

Appendix B of ENACTMENT R-270-1980 states:

A. A proposed zone change must be found to be consistent with the health, safety, morals, and general welfare of the city.

Regardless of what statistics the city presents about how the increased number of diesel trucks going in and out of the proposed Transfer Station site will not affect air and noise quality, **common sense** tells us air and noise pollution will not remain static. It will get worse! Regardless of what the city tells us about the saving of money on gas, **we all know** that transporting waste which is collected near the landfill on the west side, all the way back to the north valley, to then be transferred to another vehicle, to return again to the landfill, is ridiculous. Regardless of what the city tells the community, this project will negatively affect our health, safety and general welfare. (Appendix B, R-270-1980 A)

Please consider more forward looking visions for treating and recycling waste, as modeled by cities like Portland, OR; San Diego, Riverside and Sacramento, CA.

And consider what Brooklyn citizens, quoted in a New York Times article dated December 23, 2016, say about living next to a transfer station: <http://nyti.ms/2ioRhoA>

It is so bad, Ms. Torres said, that residents cannot even open their windows because of the dirt and dust whipped up by the constant traffic at the Brooklyn Transfer Station on Thames Street, which has been the subject of a neighborhood campaign calling for it to be closed.

After the closing of Fresh Kills in 2001, a patchwork network of waste transfer stations emerged, often in what were then largely industrial sections of the city.

The burden fell particularly heavy on three neighborhoods in North Brooklyn, the South Bronx and southeast Queens, where some 75 percent of the city's trash is hauled and sorted.

For years, activists pushed for what they called waste equity, with more communities shouldering a share of the trash burden.

Lorraine Johnson says she remembers the garbage trucks that lined up near her housing project on the Upper East Side of Manhattan, to unload trash at a marine sanitation station on the East River.

They made noise, spewed diesel fumes, attracted rats and smelled bad — “like dead bodies,” she said.

The proximity of public housing figures prominently in a battle by Upper East Side residents to derail a city plan to reactivate a waste transfer station on the East River at 91st Street. In lawsuits, rallies and lobbying in the State Legislature, they argue that economically disadvantaged residents, already struggling, should not be saddled with additional problems.

“How can you ignore the fact that the closest community is 80 percent minority?”

“It shows that they generally don't build this sort of facility in high-income areas,”

Unlike with other agencies, she said, if anything goes wrong in the transition — even for a day — the public will notice and the political fallout will be swift.

Respectfully submitted,

Loren Kahn

Resides in South Guadalupe Trail Neighborhood (Association)

Works in Near North Valley Neighborhood (Association)

Member of the North Valley Coalition

To: Peter Nicholls, Chairman, City of Albuquerque Environmental Planning Commission

From: Kelly O'Donnell, PhD

Date: October 4, 2015

Re: Economic analysis of solid waste facility at 4600 Edith NE

Dear Mr. Chairman,

Thank you for the opportunity to share my analysis of the proposed transfer station at 4600 Edith with you and the members of the Commission. As an economist, I read through the 2014 update of the Albuquerque Transfer Station Feasibility Analysis and the recently submitted Project Narrative with great interest. Both documents contain a great deal of useful information. I would like to highlight the following:

1. The project does not produce cost savings for the city unless the three existing convenience centers are closed. City officials have repeatedly stated that the convenience centers will remain open.
2. Full build-out of the proposed transfer station and solid waste facilities will cost the City of Albuquerque and its residents \$1.6 million in the first year of operations and \$3.2 million over the project's life cycle.
3. In light of these facts, the assertions in the Feasibility Analysis and the Project Narrative that the project will save the city money and prevent future trash collection rate increases are inaccurate, and the reverse – that costs arising from the project may expedite increases in trash disposal rates and convenience center user fees – is more likely to be true.

In addition, it is important to note that:

1. Using the Edith site rather than purchasing a more suitable one does not save the city \$5 million as is stated in the Feasibility Analysis. The cost of using an asset is the revenue foregone in not employing it elsewhere. The city's land at 4600 Edith is worth \$3.2 million according to Bernalillo county assessor records.
2. Research on other, similar projects indicates that the transfer station may depress property values within a 1.5 mile radius, reducing property tax revenue by \$232,000 and depleting home owner assets by \$17.5 million.
3. The presence of a transfer station will undermine prospects for future revitalization, commercial development and job growth in the neighborhood.
4. The negative health outcomes likely to result from the transfer station all impose large costs on government and the community.

Full build-out will cost city residents \$3.2 million

Full build-out of the proposed transfer station and solid waste facilities at 4600 Edith NE will impose a \$3.2 million net cost on the City of Albuquerque unless all other city convenience centers are closed (updated Feasibility Analysis, p.10). City officials have stated that all convenience centers will remain open.

The city's cover memo to the 2014 Feasibility Analysis, states that "The primary goal of building a waste transfer station is to reduce the cost of transporting waste to the landfill." If the WTS increases, rather than decreases, the city's waste disposal costs, the primary justification for developing the transfer station is eliminated. Further, in responding to several of the policies and criteria from Resolution 270-1980, the Albuquerque-Bernalillo Comprehensive Plan, and the North Valley Area Plan necessary for a zone map amendment, the Project Narrative asserts that the project will "save the city \$75 million over 20 years," and "forestall rate increases" for consumers. If, as the feasibility analysis suggests, the project will impose a net cost on the city, these statements are inaccurate and should be disregarded. In fact, by the logic of the Project Narrative, costs arising from the project may expedite future increases in trash collection rates and user fees.

Using the Edith site does not save the city \$5 million

Contrary to the Feasibility Analysis, using the Edith site rather than purchasing more suitable property will not save the city \$5 million. The Feasibility Analysis recommends that the site's existing Solid Waste Department facilities be razed and rebuilt from the ground up. Thus the Edith site has no inherent advantage over other sites and, although it is already owned by the city, its use is not without cost. The cost to the city of using the Edith site is the value of the site's alternative uses. According to the county assessor, the city property at 4600 Edith is worth \$3.2 million. Presumably, the city could re-purpose, sell or swap the Edith parcel. The net value of such transactions must be subtracted to calculate the true value of using the site.

A transfer station may depress property values within a 1.5 mile radius, reducing property tax revenue and depleting homeowner assets

Proximity to the noise, congestion, odors and toxicities of a facility processing 3 million pounds of waste daily will likely reduce residential property values and thus property tax revenue. Numerous studies in the US and abroad have demonstrated a negative correlation between proximity to high volume waste sites and property values. This research suggests that the transfer station will depress property values within a 1.5 mile radius of the site, with properties closest to the station experiencing the greatest impact. A 2005 meta-analysis concluded that the value of residential property immediately adjacent to solid waste sites was depressed by an average of 12.9 percent while property values one mile from the site were depressed by an average of 7 percent.ⁱ However, the

most definitive study of how waste transfer stations impact property values, published in the journal Waste Management in 2007, found that transfer stations impacted the value of residential property within a 1.8 mile radius. The impact on property values decreased as distance from the facility increased, declining from roughly 9 percent within one-quarter mile of the facility to two percent at 1.4 miles from the facility.ⁱⁱ

The impact on residential property values from Edith WTS was estimated by applying the coefficients from the Waste Management study to geo-coded 2015 appraisal data from the Bernalillo County assessor. The results are provided in Table 1.

The areas surrounding the site in which property values may be impacted are depicted in Exhibit 1. The five concentric rings radiating outward from the site each correspond to a percentage change in property value. The inner ring represents those properties within one-quarter of a mile of the site. The value of these properties is expected to decline by 9 percent as a result of the WTS. The outermost ring represents those properties within 1 mile and 1.5 miles of the site. Property values in this zone are expected to decline by 2 percent. Percentage declines in property value as a function of proximity to the site are presented in Table 1.

There are 4,653 homes within 1.5 miles of the proposed transfer station with a combined property value of approximately \$594 million. If residential property values surrounding the site decline at the rates documented in earlier research and listed in Table 1, residents of the impacted area will lose \$17.5 million in home value and local governments will lose approximately \$223,232 in annual property tax revenue.

| Distance from WTS | Property Value Reduction | Homes | Residential Property Values | Property Value Reduction | Property Tax Reduction |
|-------------------|--------------------------|-------|-----------------------------|--------------------------|------------------------|
| 1/4 mile | 9% | 3 | \$299,020 | \$26,912 | \$343 |
| 1/2 mile | 8% | 69 | \$6,913,941 | \$553,115 | \$7,058 |
| 3/4 mile | 7% | 392 | \$44,362,132 | \$3,105,349 | \$39,624 |
| 1 mile | 5% | 905 | \$98,466,774 | \$4,923,339 | \$62,822 |
| 1 1/2 mile | 2% | 3,284 | \$444,300,000 | \$8,886,000 | \$113,385 |
| Total | | 4,653 | \$594,341,867 | \$17,494,715 | \$223,232 |

Source: Author calculations using geo-coded 2015 Bernalillo County Assessor data compiled by William Hudspeth.

It is very important to note that the analysis presented here considers only residential property values, which constitute just 21 percent of property value in the vicinity of the site. It is reasonable to expect the WTS to depress the value of some neighboring commercial property, however, because research to-date has focused on residential

property values, there is no basis upon which to quantify the potential magnitude of impacts on non-residential values.

Impact on household assets and homeowner net worth

Home equity is the largest single asset held by most American households. Home value may constitute the *sole* asset of many low-and moderate-income homeowners in the area of the proposed transfer station. Assets provide financial stability to families living paycheck-to-paycheck, enabling them to weather a temporary lay-off or health crisis without triggering the downward financial spiral that can easily culminate in homelessness. A several percent reduction in home value could significantly deplete or even eliminate net worth for many neighborhood families. If the presence of the transfer station forecloses future opportunities for neighborhood revitalization, the impact on property values and home equity may be compounded over time.



Location of Parcels within Zones based on Distance from Proposed Site of the North Valley Waste Transfer Station (1/4 Mile Increments)

Legend

- North Valley Waste Transfer Station
- Parcels within 1/4 Mile
- Parcels between 1/4 and 1/2 Mile
- Parcels between 1/2 and 3/4 Mile
- Parcels between 3/4 and 1 mile
- Parcels between 1 and 1 1/2 mile

A transfer station may undermine future revitalization and job growth

The area likely to be impacted by the transfer station is home to over 500 private businesses including retailers, professional services, food manufacturers, warehousing, distribution, and government services with over 16,000 proprietors and employees and payrolls in excess of \$272 million.ⁱⁱⁱ

These businesses may experience declining property values, diminished productivity due to traffic congestion and reduced retail sales as the neighborhood environment is degraded. In addition, by damaging the public perception of the surrounding neighborhoods, the transfer station is likely to diminish the community's future prospects for economic development and revitalization.

Health impacts impose high costs on government and the community.

The Health Impact Assessment of the transfer station provides an inventory of possible health consequences, all of which impose costs in the form of lost productivity, increased utilization of the healthcare and emergency response systems, and greater dependence on the social safety net. These costs are potentially quite large, but also difficult to forecast.

The more readily estimated tax revenue and employment impacts presented in this memo should be regarded as lower bound estimates of total cost, both because they exclude the aforementioned health impacts and because they do not account for reduced commercial property values or other business impacts.

In conclusion, reducing the cost of solid waste disposal through development of a new transfer station is a laudable objective that warrants further study. However, waste facilities such as the waste transfer station contemplated at 4600 Edith NE generate numerous negative externalities. It is therefore essential that the benefits and costs of any siting decision be weighed extremely carefully. Potential costs unaccounted for in the 2014 update of the transfer station feasibility study commissioned by the City of Albuquerque Solid Waste Department include \$17.5 million in lost home values, job and productivity losses due to traffic congestion and environmental degradation, and a \$232,232 reduction in annual property tax revenue.

Sincerely,

Kelly O'Donnell, PhD

ⁱ Braden, J., Feng, X., Won, D. (2011). Waste sites and property values: A meta-analysis. Environmental and

ⁱⁱ Eschet, T., Baron, M., Schecter, M., Ayalon, O. (2007). Measuring externalities of waste-transfer station using hedonic prices: Case study: Israel. Waste Management. 27 (5).

ⁱⁱⁱ U.S. Department of Commerce, County Business Patterns, 2013 by Zip Code, portions of 87107, 87102, 87104, and 87197 corresponding to census tracts 30.01, 30.02, 3100, and 2900

12/28/2017

RE: Proposed Edith Transfer Station

Dear Ms. Hudson and The Environmental Planning Commission:

My name is Dr. Dan Waldman, I'm a Family Physician and the Program Director for one of the largest and highest rated Family Medicine residencies in the country. Our program is also the largest supplier of physicians to the state and we have a clinic near the proposed Transfer Station.

I recently became aware of the Albuquerque and Bernalillo county Comprehensive plan. In it are the following statements under the section about Air Quality (IIC1):

"Citizens shall be protected from toxic air emissions."

Also

"Air quality considerations shall be integrated into zoning and land use decisions to prevent new air quality/land use conflicts."

I keep coming back to the phrase "toxic air emissions." Keep in mind, this is a document written in the late 80's and amended over time, but it's not meant to be a cutting edge technological treatise on how to minimize toxic air emissions- it sets out our ideals about how we make decisions.

One thing we do know- as our science gets better, we get better at seeing the harms of increased diesel exhaust. I've submitted recent articles for consideration. What they show is an alarming trend where we are finding more and more connections between exhaust fumes and not just lung cancer, which we've known for a while, but illnesses as diverse as heart attacks and strokes in women, wheezing and asthma in children and even gestational diabetes in pregnant women. Also, overall lost days from work.

Simply stated- this is an understandable pattern taking shape: the better our detection techniques get, the more we find. This usually means one thing: we're going to keep finding more and more. Decisions to expose localized neighborhoods to more airborne particles will look worse over time.

I've seen transcribed comments where proponents of this project state that they believe the Health Impact Assessment was biased, that the document was created to advance a specific point of view. Let me state clearly, the bias in that document is "The Health of the Community."

Another confused argument is that this will be better overall for air quality. The problem is that this will create a very specific and very local increase in diesel exhaust. The local community will bear the burden of worse air quality and health outcomes so others in the greater Albuquerque area could do very slightly better.

I also read the odd statement that basically this community already has such bad health outcomes- in effect they are so poor already- that the health impact assessment is overstating impacts that already exist because of their existing poverty. Well, at least there is agreement about the current health status of the community. Health inequality can be seen in health outcomes, and in that regard, the opposite of poverty is health.

I respect and appreciate pragmatic goals- in this case, to save taxpayer money. Would the transfer station save money over time? Maybe- maybe not. Fuel costs will decrease. The costs associated with chronic illness will increase. Prevention is always cheaper than paying for treatment. Also, let's not forget that there are things more important than money and health tops that list.

The creation of an in-city transfer station, in an area with houses and schools, doesn't seem in fitting with the Albuquerque I sell to our applicants, the city we are all proud of. This is the wrong direction to go.

Thank you for your time.

Sincerely,

A handwritten signature in black ink that reads "Dan Waldman" with a long horizontal flourish extending to the right.

Daniel Waldman, MD
Residency Director
University of New Mexico
Department of Family and Community Medicine
1 University of New Mexico
Albuquerque, NM 87131-0001
(505) 272-6607
dpwaldman@salud.unm.edu

December 20, 2016

Mrs. Karen Hudson, Chair
Environmental Planning Commission
City of Albuquerque
P O Box 1293
Albuquerque, NM 87103

RE: **PROJECT # 1010582 EDITH TRANSFER STATION PROJECT-4600 Edith Blvd. NE**

Dear Chair Hudson:

I am writing you and your fellow Commissioners to implore you to reject the zone map amendment request for the Edith Transfer Station proposed Project.

I have lived at 4200 Edith NE-Apt B for two years and live less than 100 feet from the Solid Waste Departments yards.

The proposed more intensive use for this property will be harmful to my residence by the increased traffic, increased idling of large trucks, as well as private vehicles entering a convenience station. Bicycle traffic will also be adversely affected.

My neighbors and I already put up with a lot of noise odors and acrid odors. Now I am afraid that with up to 2,500 tons of garbage coming into the area, it will surely cause increased rodent and bird activity.

Design of the facility cannot mitigate rodents or bird activity. The City has never been a good neighbor to any of the residents of my area, in the years I have lived in the area. Public meetings have not been productive in producing design modifications.

This is inappropriate in an Urban area. It is one thing to have M-1 zoning all around me. It is quite another to have all of Albuquerque garbage coming into my living area, daily.

It seems like the little guy has to put up with the harmful, intrusive industries.

Please DENY THIS ZONE MAP CHANGE.

Thank you,

Gabriel Benavidez



4200 Edith NE - Apt. B
ALBUQ. NM 87107

Gould, Maggie S.

From: sonofchavez <sonofchavez@aol.com>
Sent: Monday, December 26, 2016 9:43 PM
To: Gould, Maggie S.
Subject: Reference project #1010582

I ask that you do not allow the project 1010582 to be approved. I believe the project will negatively impact the surrounding area, and will create a major health and safety problems that comes from solid waste being in close proximity of urban neighborhoods. I also believe the surrounding home values will be depressed, and the bottleneck traffic resulting on the freeway and side streets will cause accidents, and even death. The current streets and freeway infrastructure were not intended, nor designed to handle such a large influx of traffic by heavy trucks loaded with solid waste. The side streets cannot be widened enough to handle such a large volume of traffic, nor can the freeway be modified to accommodate the excess traffic without freeway traffic backing up at the Griegos on ramp and freeway. In addition, the resulting trash that always flies off the back of trash trucks will be the cause of many accidents in an area that is very congested with traffic and people. If the safety and health of people is of any concern, then I ask that you reject project 1010582. Thank you
Michael

Review of Traffic Impacts from the Proposed Waste Transfer Station in Albuquerque, New Mexico

August 11, 2015

Prepared by:
Sustainable Systems Research, LLC

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Executive Summary

The City of Albuquerque proposes to build a Waste Transfer Station (WTS) at 4600 Edith Blvd at the southeast corner of Comanche Road and Edith Blvd. The site is currently owned and occupied by the City's Solid Waste Department (SWD), and is home to central administrative offices, the SWD dispatch center, and the main hauling yard where waste collection vehicles are stored and maintained.

The proposed project will reconfigure the site to expand its current uses to include a WTS. The City's waste collection vehicles will unload their waste at the WTS before returning to their routes to continue waste collection (instead of traveling directly to the landfill as they do currently). The facility will also serve as a convenience center for the general public to unload waste that will go to the landfill. Transfer trucks will then carry waste (from the City's collection and from the convenience center drop-offs) from the WTS to the landfill each day. The project will also include a Household Hazardous Waste Collection Facility and a Recycling Drop-off for the general public as well as a gatehouse and scale complex to serve vehicles dropping off waste. The site may also house a Re-Use area [1]. The proposal has been narrowed down to two possible designs (Design Plans C and D.)¹ The final design determination will occur at a later date.

Residents and businesses in the area have raised a number of concerns about the project's traffic, noise, odor, pest, economic, and environmental impacts. In an effort to evaluate those concerns, the Board of the North Valley Coalition requested that health professionals partner with interested residents and businesses to conduct a Health Impact Assessment.

The City has released a Draft Traffic Study which found that the project would not have traffic impacts [2]. A number of residents and businesses have expressed ongoing concern about the traffic impacts of the project and skepticism about the Draft Traffic Study findings. This report provides additional analysis of the project's transportation impacts in concert with the Health Impact Assessment effort. The focus is primarily on distilling the available information into reasonable and transparent estimates of new project trips traveling to and from the proposed WTS to allow for re-examination of the project effects in the project area.

In examining new project trips that will be generated by the proposed Waste Transfer Station, we are unable to verify the estimates that have been reported by the City. Depending on the source, estimates of expected new project trips vary, and many of the estimates are not justified or seem to conflict with each other. In order to determine reasonable and transparent estimates of project trips, we relied on

¹ <http://www.abqets.com>, accessed July 1, 2015

more detailed information about the underlying assumptions that were used to generate estimates. This allows us to unpack the trip estimates that have been reported by the City, evaluate the merits of the underlying assumptions, adjust assumptions where appropriate, and repack trip estimates using transparent assumptions. In many cases, more detailed information was provided after the Draft Traffic Study was released; we anticipate that some of the adjustments made in this report may also be made in a Final Traffic Study (which may be underway).²

Overall, our analysis indicates that the project will likely result in 390 to 732 new trips per weekday and 528 to 680 new trips per weekend day. Of these total trips, 232 to 254 trips per weekday and 33 to 43 trips per weekend day will be truck trips. These ranges exceed trip estimates calculated by summing the City's trips estimates. We also find that collection truck trips will likely occur during peak travel periods although they were excluded from the analysis of peak hour traffic in the Draft Traffic Study. Additionally, we find that trips made by collection trucks and made to and from the convenience center are likely to travel to and from the proposed site via intersections that have not been considered in the Draft Traffic Study (such as intersections along Montaña Road).

Finally, we find that residents' concerns about air quality, bike and pedestrian and transit accommodation, noise, and safety were not addressed in the Draft Traffic Study. Our analysis suggests that these potential project impacts should be analyzed more thoroughly in a Final Traffic Study to determine whether they are significant, and if so, to evaluate design and/or mitigation alternatives. We note too that this analysis was limited in several respects; noise, safety, air quality, and bike/pedestrian/transit accommodation impacts were not quantified, and concerns about other environmental considerations such as odors, pests, and water quality, were not addressed here.

² Since the Draft Traffic Study was completed, the City has presented additional information about baseline weekend traffic levels and the exact timing of project trips; it seems particularly likely that a Final Traffic Study will account for these details.

Introduction

The City of Albuquerque proposes to build a Waste Transfer Station (WTS) at 4600 Edith Blvd at the southeast corner of Comanche Road and Edith Blvd. The site is currently occupied by the City's Solid Waste Department (SWD), and is home to central administrative offices, the SWD dispatch center, and the main hauling yard where waste collection vehicles are stored and maintained.

The proposed project will include a reconfiguration of the site to continue to house its current uses as well as to provide a WTS. The City's waste collection vehicles will unload their waste at the WTS before returning to their routes to continue waste collection (instead of traveling directly to the landfill as they do currently). The facility will also serve as a convenience center for the general public to unload waste that will go to the landfill. Transfer trucks will then carry waste (from the City's collection and from the convenience center drop-offs) from the WTS to the landfill each day. The project will include a Household Hazardous Waste Collection Facility and a Recycling Drop-off for the general public as well as a gatehouse and scale complex to serve vehicles dropping off waste. The site may also house a Re-Use area [1]. The City's recycling collection fleet is currently housed at the site and unloads at the Friedman Recycling Center; this configuration is expected to remain unchanged when the project is built. Several potential site layouts have been considered, each with different routes for access to and egress from the site. The proposal has been narrowed down to two designs (Design Plans C and D.)³ The final design determination will occur at a later date.

Residents and businesses in the area have raised a number of concerns about the project's potential for increasing traffic, noise, odor, pests, economic, and environmental impacts. In an effort to evaluate those concerns, the concerned residents and businesses have partnered with health professionals to conduct a Health Impact Assessment.

In June of 2014, Draft Traffic Study was completed for the City. The Study found that the project would not have traffic impacts [2]. A number of residents and businesses have continued to express concern that report's assessment of traffic impacts has been vastly under-estimated.

This study provides external assessment of the project's transportation impacts, including discussion of the air quality, bike and pedestrian, noise, and safety impacts. This analysis accompanies a Health Impact Assessment that has also been performed.

In order to evaluate the potential traffic impacts of the facility, we reviewed a number of documents and data sources, including several that provided details

³ <http://www.abqets.com>, accessed July 1, 2015

about the project specifically. Our analyses relies primarily on information presented in: the Draft Traffic Study [2], the 2014 Feasibility Study [3], the City's Traffic Slide [4], the Design Memorandum [1], and the City's Data Table [5]. Each is further described below.

Draft Traffic Study (June 2014): The draft traffic study (prepared by Wilson & Company for the City of Albuquerque) estimates the expected traffic impacts of the project at buildout in 2018, assuming a background 1% annual growth rate in traffic levels along the affected corridors. The study evaluates peak traffic flows at five intersections: Griegos Road & 4th Street, Griegos Road & 2nd Street, Griegos Road/Comanche Road & Edith Blvd, Comanche Road & I-25 Pan American Frontage Road S, and Comanche Road & I-25 Pan American Frontage Road N.⁴ The study found that the project would not have any significant traffic impacts in the project area as the existing level of service (LOS) at four of the studied intersections is acceptable and would remain so under project conditions. The fifth intersection, Griegos Road & 4th Street, operates at LOS F during the afternoon peak (with an average of 102.9 seconds of intersection delay per vehicle), however the analysis predicts no new trips during the afternoon peak at that intersection due to the project.

2014 Feasibility Study (February 2014): The 2014 Feasibility Study (prepared by J.R. Miller & Associates for the City of Albuquerque) is an update to a 2011 Feasibility Study. It provides project parameters and evaluates the economic feasibility of various project alternatives.

City's Traffic Slide (April 2015): A slide entitled "Existing and New Traffic" shows the expected traffic associated with the project by time of day alongside the peak traffic volumes at the five intersections examined in the Draft Traffic Study. The slide is posted at the City's website and has logos for the City of Albuquerque, J.R. Miller & Associates, Wilson and Company, CDM Smith, and MRWM Landscape Architects.

Design Memorandum (March 2015): A report detailing the design parameters for the facility. The report was prepared for the City of Albuquerque by J.R. Miller & Associates.

City's Data Table (unknown date): A hard copy of a data table provided by the City of Albuquerque to the Health Impact Assessment team in February 2015 summarizes the current landfill, Friedman Recycling Center, and SWD facility trips by vehicle type. The table includes information about the timing

⁴ Peak periods are defined as weekdays 6:30 am – 9:30 am ("AM peak"), 11 am-1:30 pm ("mid-day peak"), and 3 pm – 6:30 pm ("PM peak"). Peak turning movement counts were collected at the five intersections on December 4, 2013 and December 12, 2013.

of trips (weekends vs. weekdays, time leaving and returning to the SWD facility).

We start by evaluating baseline traffic conditions in the project area. We then evaluate the potential for additional vehicle trips that can be expected in the project area as a result of the project. Subsequent sections discuss the potential impacts of those additional vehicle trips.

Due to limited time and resources we present a quantitative evaluation of the trips that will result from the project and a qualitative discussion of the impacts of those trips. We also provide a number of specific recommendations for improving the City's Traffic Study. It is beyond the scope of this analysis to quantify the traffic impacts in terms of intersection delay, specific changes in noise or air pollution levels, or other quantitative metrics.

Baseline Traffic Conditions

The project will result in additional collection truck trips, transfer truck trips and convenience center trips to and from the project site. Most of these trips will occur via I-25 to/from Comanche Road, although some trips will occur along other routes. Convenience center trips will likely be greatest on weekends.

In order to assess the effect of these trips on traffic flow in 2018, we review the baseline traffic conditions in the study area. When evaluating impacts in 2018, the Draft Traffic Study assumes a 1% growth rate in baseline traffic over existing conditions (which were measured in 2013). The 1% growth estimate is based on historic trends in traffic data and does not specifically account for development projects planned in the area [2, 6].

Intersections

Under the 2010 Highway Capacity Manual guidelines for signalized intersections, level of service (LOS) A, B, C, or D is generally considered acceptable and F represents highly congested conditions. The Draft Traffic Study states that the current LOS at the five study intersections during the AM, Mid-Day, and PM peaks are as follows, [2]:

- Griegos Road & 4th Street: C / C / F
- Griegos Road & 2nd Street: C / C / D
- Griegos Road/Comanche Road & Edith Blvd: C / C / D
- Comanche Road & I-25 Pan American Frontage Road S: C / C / C
- Comanche Road & I-25 Pan American Frontage Road N: C / C / D

The Draft Traffic Study also identifies the LOS for each approach direction, showing service levels of E and F for the following locations:

- Griegos Road & 4th Street: Eastbound PM (F), Westbound PM (F), Northbound PM (F)
- Griegos Road & 2nd Street: Northbound PM (E)
- Comanche Road & I-25 Pan American Frontage Road N: Westbound PM (E)

The LOS estimates presented in the Draft Traffic Study are based on peak period data collected at the five intersections on December 4, 2013 and December 12, 2013. Each intersection was observed during one day, and the Comanche Rd & I-25 Pan American Frontage Road S intersection was observed during slightly different periods than the other intersections (7:45am – 10:45am, 12:30pm – 3pm, and 4:15pm – 7:45pm instead of 6:30am – 9:30am, 11am – 1:30pm, and 3pm – 6pm, respectively); this variance was not explained in the Draft Traffic Study.⁵

The Bernalillo County Public Works Department's (BCPWD's) Traffic Impact Assessment (TIA) guidelines (Appendix A of the Draft Traffic Study) indicate that "...the minimum intersection analysis area requirement is site access and adjacent intersections, plus the first major intersection in each direction from the site." (page 6). Under this guidance and in light of the predicted trip routes (discussed later in this report), it is unclear why intersections located north or south of the site were not considered in the Draft Traffic Study (e.g. along Montaña Road or Candelaria Road).⁶

Roadways

The TIA guidance document discusses the evaluation of traffic for road segments as well as intersections. Below we review the available data for existing roadway traffic conditions in the area.

Weekdays

Figure 1 and Figure 2 show weekday afternoon peak period volume-to-capacity ratios (V/C) in the project vicinity (based on 2012 traffic data from the Mid-Region Council of Governments). These data indicate that several road segments are over capacity or severely congested during the afternoon peak period:

- Comanche/Griegos Road (westbound between Edith Blvd and 2nd Street and between the I-25 overpass and I-25 Pan American East Northbound) is severely congested,
- Edith Blvd (in both directions from Candelaria Road to Montaña Road) is over capacity and severely congested,

⁵ According to the Draft Traffic Study Appendix B, the four other intersections were observed from 6:30 am – 9:30 am, 11 am – 1:30 pm, and 3 pm – 6 pm on December 4, 2013 (4th Street & Griegos Road, 2nd Street & Griegos Road, Griegos/Comanche Road & Edith Blvd) or December 12, 2013 (Comanche & I-25 Pan American Frontage S, Comanche & I-25 Pan American Frontage N).

⁶ The Draft Traffic Study assumes that peak hour traffic travels along Comanche Road to/from the I-25 interchange and west of the interchange and to/from Edith Blvd south of the proposed WTS. It assumes that no traffic travels through the 4th Street / Griegos Road and 2nd Street / Griegos Road intersections (these intersections were evaluated), while it is very likely that the traffic assumed to travel south on Edith Blvd would travel through the Edith Blvd/Candelaria Road intersection (this intersection was *not* evaluated). In the Additional Project Trips section of this report, we evaluate routes and find that it is likely that a portion of new project trips will travel through the intersections examined in the Draft Traffic Study as well as intersections along Montaña Road and Candelaria Road.

- 4th Street (in both directions from Candelaria Road to Griegos Road and northbound to Montaña Road) is over capacity and severely congested,
- Montaña Road (in both directions between 4th Street and I-25 and westbound west of 4th Street) is severely congested,
- Exiting I-25 southbound and existing and entering northbound to/from Comanche/Griegos Road is over capacity and severely congested.

Weekends

The City has also collected weekend traffic counts along Comanche Road (west of Edith Blvd) and Edith Blvd (south of Comanche Road) from April 17th – 19th.⁷ These counts indicate that traffic at these locations is below capacity on the weekends, with the exception of Edith Northbound which exceeds its capacity during the Friday afternoon peak.⁸

⁷ These data were provided in a personal communication from Jill Holbert (City of Albuquerque) to Kitty Richards (Health Impact Assessment Team) on June 12, 2015.

⁸ The highest volumes observed from Friday through Sunday are as follows: Comanche Road EB (834 on Friday 4 pm), Comanche Road WB (615 on Friday at 8 am), Edith Blvd NB (645 on Friday at 4 pm), and Edith Blvd SB (504 on Friday at 4 pm). Corresponding capacities (based on MR COG 2012 data) are as follows: Comanche Road EB and WB (1200) and Edith Blvd NB and SB (600). The Edith Blvd NB volume exceeds capacity on Friday at 4 pm, while the next highest volume at that location, 568 observed on Friday at 3 pm, does not exceed capacity.

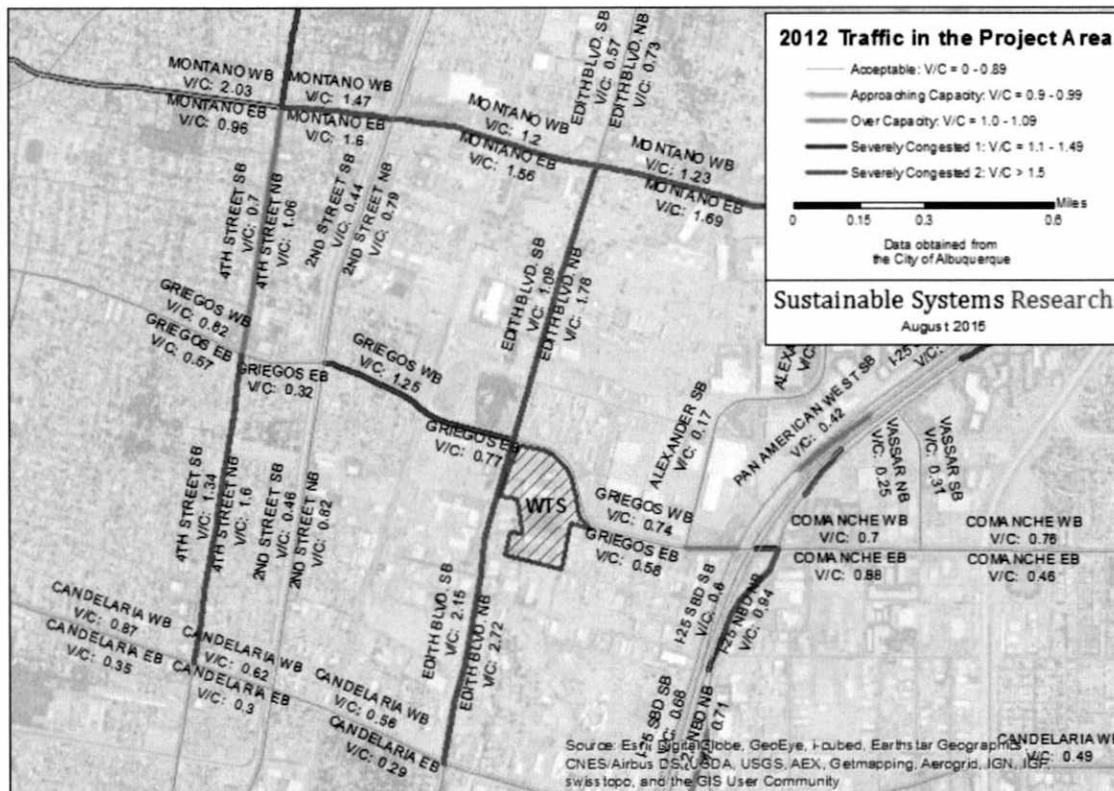


Figure 1: Traffic along roads near the Proposed WTS. Volume to Capacity (V/C) ratios shown reflect 2012 traffic counts and roadway capacities during the afternoon peak period. Roadway data provided by MRCOG. WTS property outline based on city owned property data obtained from the City of Albuquerque.

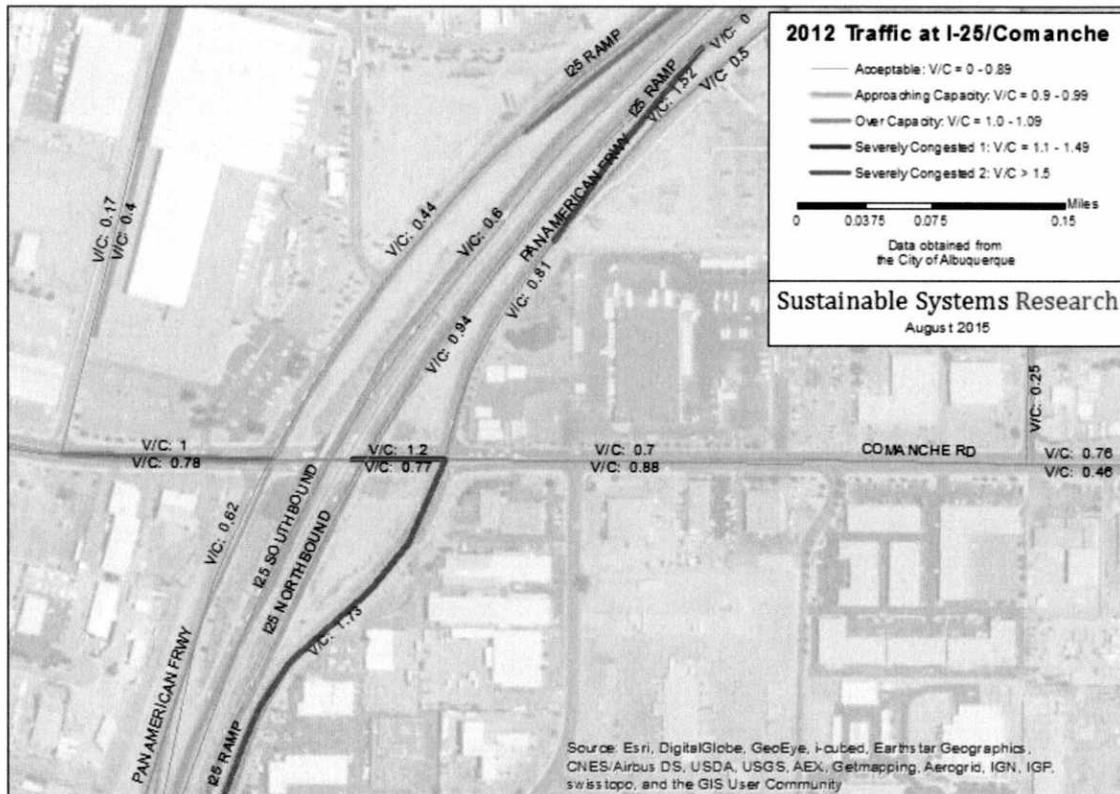


Figure 2: Traffic at the I-25 & Comanche/Griegos Road intersection. Volume to Capacity (V/C) ratios shown reflect 2012 traffic counts and roadway capacities during the afternoon peak period. Roadway data provided by MRCOG. WTS property outline based on city owned property data obtained from the City of Albuquerque.

Additional Project Trips

This report focuses on the *additional* transportation impacts of the project (those impacts that occur due to the project changes rather than impacts associated with existing site activities). Once the proposed WTS is completed, several new streams of traffic will access the site. First, waste collection vehicles will return to the facility during their routes to drop off waste rather than driving to the landfill. Additionally, the general public will visit the facility to drop off landfill waste, household hazardous waste, and recycling and re-use materials. Finally, transfer trucks will transport waste from the facility to the landfill.

In this section we estimate the timing, routes, and number of trips associated with collection trucks, public drop-off trips, and transfer trucks. As described below, we find that the City's estimates⁹ varied widely and the assumptions behind many of the estimates were not transparent. We use the most detailed and transparent information available to conduct our analysis.

Collection truck trips

Table 1 summarizes the City's trip estimates and the estimates used in this report. The City's estimates of the current collection truck trips to the landfill range from 246 to 250 round trips per day.¹⁰ These estimates are total landfill trips rather than new trips due to the project.

The estimated number of new trips to the WTS would be lower because the fleet is currently parked at the proposed facility.¹¹ The City's estimates of new collection

⁹ For brevity we use this phrase to refer to estimates reported to the City in reports drafted by consultants and estimates reported by the City at public meetings, in presentation and web materials, etc.

¹⁰ The Draft Traffic Study counts 246 trips going to the landfill currently [2], which is similar to information in the feasibility studies (246 trips in the 2011 Feasibility Study [7] and 248 in the 2014 Feasibility Study [3]), the July 15, 2015 public meeting presentation [8](248 collection trips/weekday), and in the Design Memorandum [1] (250 load/day estimate); based on this value the Draft Traffic Study estimates 500 one-way trips to the landfill per day. Note that cross checking these values with the City Data Table (which provides detailed information about current trips) yields a difference of 22 trips: based on the City Data Table, we estimate 268 trips to the landfill per weekday currently [5]. (According to the City Data Table there are 52 commercial bin trips, 16 commercial bin-hazard trips, 85 roll-off service trips, 15 roll-off special service trips, 96 residential trash trips, and 4 missed pickup trips delivered to the landfill on weekdays.)

¹¹ Waste collection vehicles are currently parked at the project site at the start and end of each day. These vehicles currently travel to the landfill to drop off waste during and at the end of their routes. Once the project is built, these trucks will drop their waste at the WTS instead of the landfill. Because the collection fleet is currently housed at the site of the proposed WTS, the actual number of **new** trips to the WTS is equal to the number of trips per day that each truck will make to drop off waste minus one. For example, a truck dropping off two loads of waste will result in one additional round trip (or two one-way trips) at the WTS. A truck dropping off five loads of waste will result in four additional round trips (or eight one-way trips) at the WTS.

To illustrate this calculation, consider that a residential collection truck making two trips to the landfill currently travels as follows: Origin at proposed WTS, travel route to collect waste, travel

trips that will result from the project also cover a range of values (from 125 to 149 round trips per weekday).¹² These estimates are low when compared with more detailed information: based on the City Slide [4], the City's Data Table¹³ [5] and proposed route maps [10] we estimate 154 to 167 new weekday round trips.¹⁴

For weekends, the City presented an estimate of 20 new round trips for Design Plans B, C, and D and 10 new trips for Design Plan A (which may be a typo) [9]. However there was no indication of the assumptions used to generate those estimates. We estimate the total number of collection trips currently occurring on

to landfill (first drop-off), travel route to collect waste, travel to landfill (2nd drop-off), return to proposed WTS to park for the night. Under the proposal, the same vehicle will travel as follows: Origin at proposed WTS, travel route to collect waste, *travel to WTS (first drop-off)*, travel route to collect waste, travel to WTS (2nd drop-off and park for the night). The additional trip to the WTS occurs at the first waste drop-off and is shown in *italics*. Note that this illustration assumes that trucks unload at the end of the day even when they are not full (it assumes that they do not hold waste overnight).

¹² The FAQ on the City's website [6] indicates that there will be 125 new weekday trips while the City's Slide [4] and Design D in the July 15, 2015 presentation [8] indicate that there will be a total of 149 new weekday trips. The City's April 2015 presentation to the Edith community [9] indicates that the project will have various new weekday trips with each design option (50 for design B, 149 for designs A and D, and 199 for design C); two of these values (50 and 199) may be typos. Each of these estimates is lower than estimates based on the more detailed information in the City Data Table, as described below. The City's presentation on July 15, 2015 indicates that there will be 224 or 298 (224+74) new collection trips in site plan C [8]; this may be a typo or a combination of new and existing trip estimates.

¹³ The City Data Table shows the current number of trips to the landfill and the number of routes and trucks. New trips are estimated from the City Data Table as follows: (# trips to the landfill per truck per day - 1) × (# routes) for weekday travel. Weekend and recycling trips listed in the City Data Table are not included in this estimate.

¹⁴ The estimate of 154 to 167 new trips is calculated as follows: 50 residential trash waste collection trips + 34 commercial front load waste collection trips + 70 to 83 commercial roll off waste collection trips. More detail about these estimates is as follows:

Residential trips: The City's Slide [4] counts 45 new residential collection trips collecting two loads each, which conflicts with an estimated 48 (residential routes) + 2 (missed pickup) collecting two loads each shown in the City Data Table [5]. We use the City Data Table estimate as it is consistent with the 48 residential routes shown for the proposed facility at the City's website. [10]

Commercial roll-off trips: The City's Slide counts 70 new trips from commercial roll-off trucks, in contrast to 80 - 83 new trips estimated from the City Data Table [4, 5]. The City Data Table estimate is more detailed. Based on the City Data Table: 17 roll-off trucks make five trips to the landfill each (for an estimated $17 \times (5 - 1) = 68$ new trips) in addition to 15 trips per day to the landfill for special roll-off collection (which may require three trucks of its own or may be carried out by the roll-off trucks engaged in regular pickups, for an estimated 12 to 15 new trips), which yields a total of 80 to 83 trips made by 17 to 20 trucks. The City Slide indicates that 20 commercial roll-off trucks drop off 4.5 loads to make 70 new trips (likely estimated as 10 trucks dropping 5 loads yield $10 \times (5 - 1) = 40$ new trips plus 10 trucks making 4 loads yield $10 \times (4 - 1) = 30$ new trips). It is unclear why the projected number of trips shown in the City Slide would be less than the current number of trips shown in the City Data Table while the number of trucks would remain the same. In light of this uncertainty we use the range of these estimates.

Commercial front-load trips: There are 34 new commercial front- and rear-load collection trips (as indicated in both the City Slide and in the City Data Table).

Saturdays based on the detailed information in the City's Data Table [5] as 24 trips/day.¹⁵

Note that the City's Data Table [5] presents the current trips for waste collection, so it does not account for the growth in waste collected in the future. We recommend accounting for growth in waste collection activities when estimating trips that will occur in 2018. Based on the details presented in the City Data Table and an assumed annual growth rate in waste of 1.5%¹⁶, we estimate that the project will result in 163 to 177 new collection truck trips per weekday and 25 new trips per weekend day in 2018.¹⁷ Note that if the assumptions about how many loads each truck takes to the landfill are incorrect then the number of new trips estimated would also need adjusting.¹⁸

Trip timing

The greatest potential for traffic impacts will occur during times of peak travel. The Draft Traffic Study does not evaluate the impacts of new collection truck trips as it indicates that the new trips will occur outside of peak travel hours (without providing the exact timing of the trips). However, the City Slide provides detail about the timing of new collection truck trips and the timing of the peak hour at each intersection, and it does indicate some overlap between new trip timing and peak hours in a number of cases [4].¹⁹ We note that the traffic counts at the

¹⁵ A total of 24 trips comes from 7 commercial bin trips + 1 rear loader trip + 4 roll-off service trips + 12 special roll-off service trips. New trips are estimated as: (# trips to the landfill/truck/day - 1) × (# routes) for weekend travel. Weekday and recycling trips listed in the spreadsheet are not included in this estimate.

¹⁶ A 1.5% rate of growth for waste (as used in the Design Memorandum [1]) would result 6% more waste in 2018 (the year the facility will be completed) than in 2014. This growth rate in waste is roughly consistent with anticipated growth in Bernalillo County, which is estimated to be 1.63% per year from 2010 to 2015 and 1.58% per year from 2015 to 2020 according to the Bureau of Business and Economic Research at the University of New Mexico (see <https://bber.unm.edu/demo/PopProjTable2.htm>.)

¹⁷ Assuming that the City's Data Table presents data for waste collection in 2014, and assuming that the new truck trips grow in proportion to waste.

¹⁸ At the January 20, 2015 public meeting it was noted that with more efficient collection (reduced travel time to drop-off waste loads) fewer trucks would be needed. We did not account for a reduction in trucks because the most detailed projected trip estimates (the City Slide and the proposed route maps posted at the City's website) assume the same number of trucks and routes as the City Data Table, which is the basis of our estimate.

¹⁹ Specifically, the commercial front- and rear-load trips are predicted to occur between 8:30 am and 10:30am; this overlaps with the peak hour at Comanche Road and I-25 southbound (which occurs from 8:30 am to 9:30am, as indicated in the City Slide [4] and in Appendix B of the Draft Traffic Study). The commercial roll-off collection trucks are predicted to occur from 7:45 am to 1 pm, overlapping with the peak hours at the following intersections: 4th Street & Griegos Road (7 – 8 am and 12:15 – 1:15 pm), 2nd Street & Griegos Road (7:15 – 8:15 am and 12:15 – 1:15 pm), Comanche Road & Edith Blvd (7:30 – 8:30 am and 12:15 – 1:15 pm), Comanche Road & I-25 Northbound (7:30 – 8:30 am and 12:15 – 1:15 pm), and Comanche Road & I-25 Southbound (8:30 – 9:30 am).

Note that for the intersection at 4th Street & Griegos Road, peak hours reported here are from the City Slide, although Appendix B from the Draft Traffic Study indicates that at 4th Street and Griegos Road the peak morning peak hour is from 7:15 to 8:15am and the peak mid-day hour is from

intersection of Comanche Road & I-25 Southbound in the Draft Traffic Study Appendix B did not include the period from 11 am to 12:30 pm; this omission is not noted or explained.

According to the City Slide, the residential collection trips are predicted to occur between 9:30 and 11:30 am,²⁰ not overlapping with any of the observed peak hours. If the City's assumption that these trucks travel to the landfill twice during each route is accurate, then this estimate is reasonable; however if these trucks make three or more landfill trips currently or in the future, then these trips would occur over a longer range of time and would overlap with peak hours at some locations.²¹ Similarly, if commercial front-load and rear-load trucks make more than two trips to the landfill then the actual time range of those trips would extend earlier and later.

In light of the information in the City Slide, which indicates that there is some overlap between new collection truck trips and peak hours [4], we find that collection truck trips merit analysis in order to determine their traffic impacts. Additionally, the greatest rate of collection trips may overlap with portions of the peak period that do not fall during the peak hour.²² It is possible that traffic levels are just slightly lower for these periods, so we recommend an analysis of traffic impacts for each hour of the peak periods in order to determine the worst project impacts²³, rather than simply evaluating the current peak hours. We also recommend that the omission of part of the mid-day peak period in the traffic counts collected at the intersection of Comanche Road & I-25 Southbound be corrected or explained.

11:45 am to 12:45 pm. Overlaps occur with these periods as well. Similarly, for 2nd Street and Griegos Road, peak hours reported here are from the City Slide, although Appendix B from the Draft Traffic Study indicates that the peak morning hour at the intersection of 4th Street & Griegos Road is 7:30 – 8:30 am. Overlap occurs with these periods as well as those described above.

²⁰ This timing is also roughly consistent with information presented in the City's Data Table, which indicates that residential trucks unload at the landfill twice and leave between 7 and 7:30 am and return between 2:30 and 3:30 pm.

²¹ With the time saved by traveling to the WTS instead of the landfill it is possible that fewer trucks could be used to carry more loads per truck. However this analysis assumes that the number of trucks remains constant based on the available data (see footnote 18.)

²² The Draft Traffic Study defines *peak periods* as 6:30 am to 9:30 am (AM), 11 am to 1:30 pm (Mid-day), and 3 pm to 6:30 pm (PM) [2]. Traffic counts were collected for the Draft Traffic Study during these peak periods in order to determine the traffic levels during the peak hours. These *peak hours* are the hours during which the traffic counts are greatest, and they are determined for each intersection and or each peak period. For example, at the intersection of Griegos/Comanche Road & Edith Blvd, traffic was observed during the three peak periods, and the highest traffic counts were observed during peak hours of 7:30 am to 8:30 am, 12:15 pm to 1:15 pm, and 3:45 pm to 4:45 pm.

²³ The worst project impacts might occur during a time period that isn't currently the worst peak hour if the project trips shift the peak hour.

Table 1: Collection truck trip estimates presented in WTS documents and estimated in this report. Round trip values are presented. One-way trip estimates are twice as much as the values shown.

| All weekday | New weekday | New weekend | Notes |
|----------------|---|--|---|
| 246 (~ 250) | -- | -- | Draft Traffic Study [2], consistent with the 2011 Feasibility Study [7] |
| 248 | -- | -- | 2014 Feasibility Study [3], July 15 public meeting presentation [8] |
| 250 | -- | -- | Design Memorandum [1] |
| -- | 125 | -- | City FAQ [6] |
| -- | 149 | -- | City Slide [4] |
| -- | 50 (Design B - typo?), 149 (Designs A, D), 199 (Design C - typo?) | 10 (design A, typo?), 20 (designs B, C, D) | April 2015 community meeting presentation [9] (shows one-way trips so they are halved here to show the number of round trips) [9] |
| -- | 163-177 trips/day in 2018 | 25 trips/day in 2018 | SSR Estimate (assumes a 1.5% annual growth rate) |

Trip routes

The effect of new collection truck trips is also a function of where they travel. Because they are not included in the Draft Traffic Study’s analysis of peak period traffic, the Study does not provide an indication of the routes that collection vehicles will use.

The City’s response to questions at the January 20, 15 public meeting [11] and the City FAQ [6] indicate that all trucks will be routed to/from the interstate via Comanche.²⁴ However the 2014 Feasibility study notes that “...some collection vehicles do not travel through the [I-40 & I-25] interchange but might use surface streets to access the transfer station” [3, page 3].

The City has posted proposed route maps for residential and commercial collection on their website [10]. The route maps (created in February 2015) indicate that for residential and commercial collection trips, most routes to and from the WTS travel via Comanche Road and I-25 northbound and southbound. However there are a number of exceptions, particularly for routes traveling along Montañó Road.²⁵

²⁴ At the January 20, 2015 public meeting, the City indicated that Montañó Road is not a truck route so all trucks would be routed to the interstates. The City of Albuquerque GIS Viewer (<http://coagisweb.cabq.gov/GeoSilver/Viewer.html?ViewerConfig=http://coagisweb.cabq.gov/Geortex/Essentials/geo42/REST/sites/AddressLookup/viewers/Advanced/virtualdirectory/Config/Viewer.xml>) indicates that Montañó is restricted from Unser to 4th Street (on the west side) and that Griegos Road is restricted from Rio Grande to 4th Street; these restrictions apply to trucks weighing more than five tons.

²⁵ Estimated exceptions for residential collection routes include: two routes traveling on Edith Blvd north of Comanche Road on Tuesdays as they travel to or from the WTS, 6 to 8 routes traveling along Montañó Road/Edith Blvd to and from the WTS on Thursdays (including 3 to 5 that travel through the intersection of 4th Street & Griegos Road), and 10 to 20 routes traveling down 2nd Street to

Appendix A shows the approximate direction of the routes in the project area as inferred from the City route maps²⁶. We note that a number of the routes shown on the proposed maps may not be accurate unless the truck routes are restricted to the routes shown and drivers do not deviate from their routes.²⁷ We recommend that the Final Traffic Study clearly delineate the proposed collection routes in the project area. In light of the project travel that is proposed to occur along Montaña and the current congested conditions observed there (see the Baseline Traffic section of this report), we also recommend that the traffic analysis evaluate traffic for potentially impacted intersections along Montaña Road.

The route that trucks use to enter the facility will depend on the final design selection. As of this report writing, the City is considering Designs Plans C and D. If Design Plan C is selected, collection trucks will access the site via Comanche Road NE and Edith Blvd NE and will exit via Edith Blvd NE [12]. If Design Plan D is selected, collection trucks will enter and exit the site from Rankin Road (via Comanche Road NE) [12]. Collection trucks currently access the site via Comanche Road NE. Note that access and egress for some existing collection truck trips (e.g. leaving the site at the beginning of the day and returning at the end of the day) will change under each design scenario (to Edith Blvd in Design C and to a location farther to the east on Comanche Road in Design D). We recommend that the traffic analysis evaluate the impact of the change in existing trip access to and from the project site, in addition to evaluating the impacts of new trips.

Convenience center, recycling, hazardous waste, and re-use drop-off trips

The proposed convenience center will accommodate residents' and small waste haulers' drop-offs of landfill waste.²⁸ These drop-offs are currently accommodated at the City's three existing convenience centers, located along the northeast, southeast, and southwest edges of the city (see Figure 3).

Information provided by the City includes a range of estimates of the traffic that will stem from convenience center drop-off of waste. Estimates range from 150 to 300

Montaña Road to Edith Blvd on Fridays as they return to the WTS). Ranges are presented here because it is difficult to visually determine each route on the maps provided. Similarly, the maps presented for commercial front-load regular collection trips indicate that on most weekdays four routes travel via Edith Blvd north of Comanche Road, with three routes traveling through Montaña Road and Edith Blvd.

²⁶ The maps show the routes that trucks take when traveling to their collection area and returning to the WTS when collection is complete. They do not show the point at which a truck might return to WTS mid-collection to drop off waste. Therefore we assume that the share of new trips taking each route is proportional to the share of all trips taking each route.

²⁷ If collection truck routes are unrestricted, on Thursdays 1 to 2 residential routes might take Montaña Road/Edith Blvd instead of I-40, 1 to 2 residential routes might take Candelaria Road/Edith Blvd, and 2 to 5 residential routes might take Greigos Road directly to the WTS. On Fridays, it may be easier to cross the river on Montaña Road rather than I-40 for 8 to 12 residential routes.

²⁸ According to <https://www.cabq.gov/solidwaste/trash-collection-drop-off/facilities>, "the [existing] convenience centers are provided for residents and small commercial haulers only."

round trips per weekday²⁹ with an estimated 350 round trips per day on weekends [6]. The weekday estimates are based on assumptions about the rate of diversion from the three existing convenience centers; assumed diversion rates range from 25 to 50%.

The diversion rates used in the City's estimates were not explained, and rates as low as 25% seem unlikely given the central location of the proposed WTS. We estimate a diversion rate based on the shortest travel time to the convenience centers from residences across Bernalillo County, arriving at a value of 50%.³⁰ Given the central location of the WTS, we recommend that the traffic study revisit the potential diversion rate from the three convenience centers to arrive at a more transparent estimate.

The estimated number of trips to the three convenience centers is not clearly explained, but appears to range from 297 to 900 trips per weekday, and from 885 to 1200 trips per weekend day.³¹ Based on the wide range of these estimates, we

²⁹ The Draft Traffic Study presents estimates that are labeled as recycling center drop-off trips; these trips appear to be convenience center drop-offs (based on the explanation of the assumptions in the Draft Traffic Study and from an explanation in the City's FAQ website [6]). These trips are estimated as 25% of the trips that occur at the other three convenience centers, totaling 48 round trips during the three peak hours. According to the City's FAQ, these peak hour estimates are based on a total of 150 trips per day, with one third of that traffic occurring during the peak hours. The FAQ also presents estimates of 225 trips per day on weekdays. This value is consistent with those presented in the City's Slide, which indicates that there will be 225 round trips per day using the convenience center from 8 am to 5pm, for an average of 25 trips per hour [4]. It is also consistent with estimates provided in recent correspondence with the City of Albuquerque (personal communication from John Soladay to Kitty Richards on May 14, 2015 and from Jill Holbert to Kristine Suozzi on June 25, 2015). In contrast, a letter to Kyle Silfer (of the North Valley Coalition) dated March 30, 2015 [13] indicates that there will be 150 to 180 weekday trips based on a diversion rate of 25-30% from existing customer trips to the convenience centers. Additionally, the Design Memorandum [1] indicates that there will be approximately 150 to 300 trips per weekday based on diversion estimates of 25-50%.

³⁰ To arrive at this estimate we assign the population of each census tract in Bernalillo County to the closest existing convenience center or the proposed WTS convenience center based on the fastest trip time from each census tract's population-weighted centroid to each convenience center. The resulting diversion estimate is 52%, which we round to 50%. Fastest trip times are determined using driving directions in Google Maps. We assume that vehicles visiting the WTS enter from Comanche (as indicated in Designs Plans C and D). For tracts where trip times are equal for the WTS and a convenience center (i.e. Google Maps indicates that the number of minutes traveling to the WTS and one of the convenience centers is equal), we assign the tract's population to the WTS because it is more centrally located than the three convenience centers and is therefore more likely to be visited by residents running a number of errands during one trip. The US Census Bureau's 2010 decennial census population and population centroid data are used in this analysis.

³¹ Based on the City's information, we infer three weekday trip rate estimates to the three convenience centers: 600 trips per weekday, 297 trips per weekday, and 900 trips per weekday, and three weekend estimates: 885 trips per weekend day, 933 trips per weekend day and 1200 trips per weekend day:

Using the diversion rates and trips rates outlined in footnote 29 (and those presented in the Draft Traffic Study), which imply that there are 600 round trips per weekday to the three existing convenience centers.

Data provided in an email correspondence with the City of Albuquerque (to Byron Gatwood from Betty Green on November 9, 2014 and November 12, 2014) indicates that visitation is 255 trips

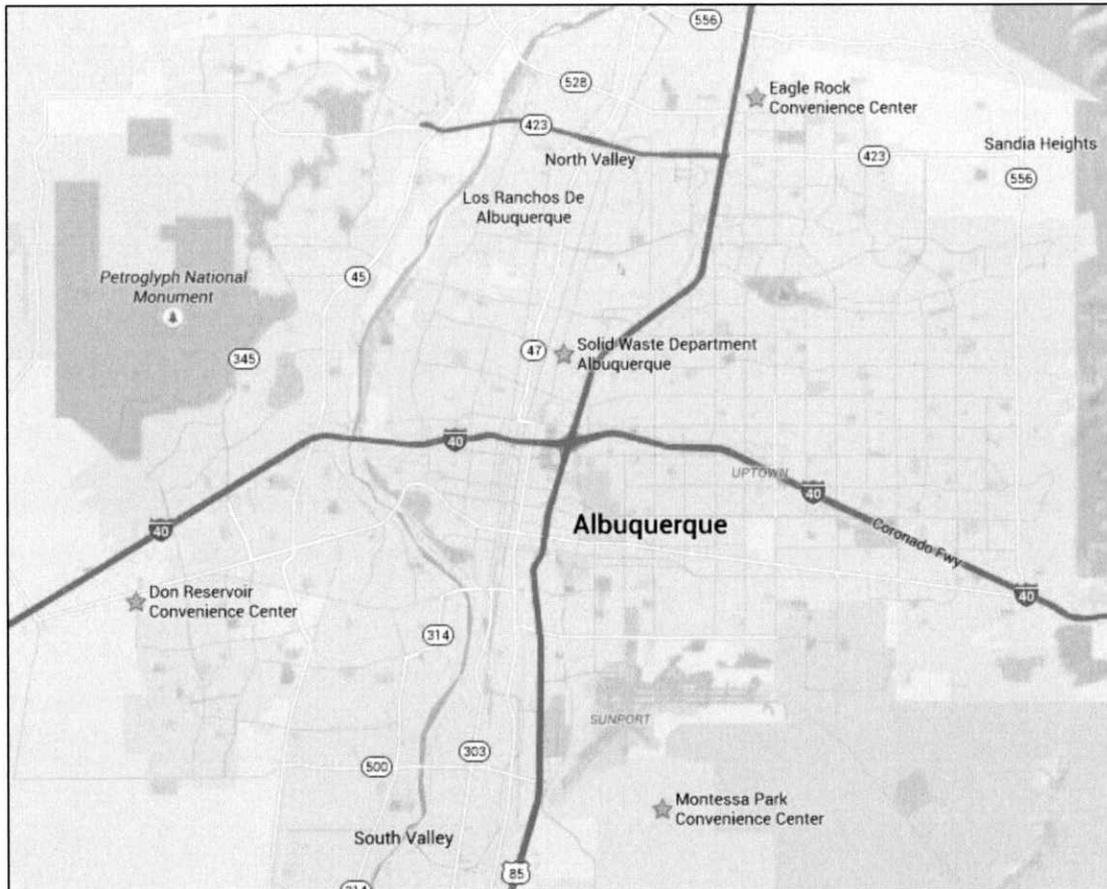


Figure 3: Existing convenience center and current solid waste department (proposed WTS) locations.
Map created using Google Maps.

recommend that the Final Traffic Study present more transparent information about typical convenience center visitation and/or collect traffic counts at the three

per weekday and 762 trips per weekend day at Eagle Rock and Montessa (2 of the 3 of the convenience centers). Scaling this information based on waste tonnage for each convenience center (as presented in the 2014 Feasibility study) implies approximately 297 trips per weekday and 885 trips per weekend day at the three convenience centers.

A final estimate is available in the Design Memorandum [1], which shows a design capacity for the self-haul area based on accommodation of all existing convenience center traffic (personal communication from Jill Holbert to Kristine Suozzi on June 25, 2015). The facility will be designed to accommodate 900 trips per weekday and 1200 trips per weekend day. The Design Memorandum indicates that these values are peak vehicles per weekday and weekend based on 2014 Waste Data from the City.

Diversion rates were not indicated for the City's weekend trips estimate of 350 trips/day, so the City estimates did not imply a trip rate for the three convenience centers. To arrive at an estimate of weekend trips rates to all three convenience centers, we assume that the City's estimate of 350 weekend trips (which was presented alongside an estimated 225 weekday trips) is based on the same diversion rate on weekdays and weekends. A diversion rate of 37.5% of 600 trips yields 225 weekday trips to the WTS. A diversion rate of 37.5% of 933 weekend trips yields 350 weekend trips to the WTS.

convenience centers on weekdays and weekends. Because the weekend convenience center visitation is expected to exceed weekday visitation, these impacts will occur when background traffic levels are lower than during the weekday peak. So while we don't expect major impacts on weekends, we recommend that the traffic study consider weekend traffic impacts or explain the their omission more transparently.

Using this 50% diversion of 297 to 900 trips per weekday and 885 to 1200 trips per weekend day from the three convenience centers we estimate that there are 149 to 450 convenience center trips per weekday and 443 to 600 round trips per weekend day to the WTS. As with the collection vehicles, these estimates are based on current convenience center visits. Growing this traffic by 1.5% per year from 2014 (consistent with the growth rate used in the Design Memorandum [1]), we estimate 158 to 478 round trips per weekday and 470 to 637 round trips per weekend day in 2018 for convenience center drop-offs.

Note that convenience center trips will be greater if the City closes any of the other three convenience centers. Although the 2014 Feasibility Study indicates that full buildout of the proposed Solid Waste Department facilities is only cost effective if the convenience centers are closed³², the City has indicated that the three existing convenience centers will remain open.³³ The Design Memorandum [1] presents WTS design parameters that are based on a worst case scenario that will accommodate all of the existing convenience center traffic.³⁴ If there is a possibility of closing the three convenience centers, we recommend accounting for full diversion of convenience center trips to the WTS in the traffic study.

The City has not presented trip estimates for the recycling drop-off, household hazardous waste drop-offs, or re-use center that will be at the site when the project is built. Without any data about existing trips for these services we are unable to quantify the trips that will be associated with these facilities. Based on an evaluation of existing and proposed facilities, we posit that the share of recycling trips that will be diverted to the proposed WTS is likely to be small,³⁵ the number of hazardous

³² In the 2014 Feasibility Study, Scenarios 1, 2, 4, and 5, which all include closing the convenience centers, show savings of \$61-133 million over the project lifecycle. Scenario 3, which assumes that the convenience centers would remain open and just the Transfer Station (but not other facilities) is built, shows \$18 million in savings over the 20 year project life cycle. Scenario 6, which assumes full project buildout similar to the Design Memorandum with convenience centers remaining open, shows losses of \$3.2 million over the 20-year lifecycle of the project. Notes from the public meeting on January 20, 2015 indicate that the project is justified by cost savings of \$2.5-4 million/year [11]. The basis for this estimate is unclear.

³³ Notes from the public meeting on 1-20-2015 indicate that this will be a fourth convenience center and that the existing convenience centers will remain open [11].

³⁴ Personal communication from Jill Holbert to Kristine Suozzi on June 25, 2015.

³⁵ According to <http://www.cabq.gov/solidwaste/recycling/recycling-dropoff>, recycling can currently be dropped off at 18 locations across the city. These drop-off locations include the Eagle Rock convenience center (so some recycling trips may be included in the total convenience center trip estimates) and the current solid waste main office (the site of the proposed WTS facility).

waste trips that will be diverted to the WTS is unknown,³⁶ and the share of re-use trips that will be diverted to the WTS is unknown³⁷. We recommend explicit consideration of recycling, re-use, and hazardous waste drop-off trips in the traffic study; omitting these trips from the analysis means that all estimates of travel to and from the WTS are under-estimated, as their omission means that the actual trips resulting from the project may be greater than the trips estimated in the analysis.

Trip routes

As with collection truck trips, the location of these trips is important for determining their impacts. In the Draft Traffic Study convenience center trips (labeled as “recycling center only”) are shown as 15% coming to/from Edith Blvd south, 30% to/from I-25 to the north, 25% to/from I-25 to the south, and 30% to/from Comanche Road on the east side of I-25. These estimates are not explained, and they do not support the notion that a significant portion of traffic will come from the neighborhoods around the project site.³⁸

We have estimated the share of convenience center traffic that is likely to take various routes to the project site based on more detailed information about the location of residences across Bernalillo County.³⁹ Based on our analysis, a number of vehicles may use portions of Montañó Road and Griegos Road to travel to and from the convenience center (see Appendix A for route details). Whether Design Plan C or D is selected, convenience center drop-offs will occur via Comanche Road.

In light of the likely routes that convenience center users will travel and the existing traffic along Griegos Road and Montañó Road, we recommend that the traffic study

Therefore the additional recycling that may result from the project is likely to be small and is not estimated separately in this analysis.

³⁶ According to <http://www.cabq.gov/solidwaste/household-hazardous-waste/household-hazardous-waste>, hazardous waste is currently dropped off at Advanced Chemical Transport (ACT, formerly Rinchem Company, Inc), located at 6137 Edith Blvd (just over a mile from the proposed WTS). ACT is open for drop-offs on Mondays, Wednesdays, and Fridays from 8:30 am to 4:30 pm and on Saturdays from 8 am to 3 pm. According to summary notes from the January 20, 2015 public meeting, this existing facility will remain open [11]. The proposed facility will accept hazardous waste from 8 am – 5 pm, seven days per week (as indicated in the Design Memorandum). Given the wider range of open hours, we expect that the share of hazardous waste drop-off trips that will be diverted to the proposed facility will be significant. However, without an estimate of how many hazardous waste drop-off trips are currently made, the overall impact of this finding is unknown.

³⁷ The City’s website does not list any re-use centers. However, there are a number of charities and thrift stores (and similar) across the city that currently accept many types of items for re-use and re-sale. The rate of diversion from these facilities to the WTS re-use center is unknown.

³⁸ Traffic is characterized as from the nearby community in the City’s FAQ website. This is consistent with the notion that the convenience center will serve the nearby community.

³⁹ We first assigned the population of each census tract to the closest existing or proposed (WTS) convenience center based on the fastest trip time from each census tract’s population-weighted centroid to each convenience center, as described in footnote 30 above. Then for each census tract that was closer to the WTS (rather than one of the other three convenience centers), we noted the route used for the fastest trip to the WTS (we used the first route recommended by Google Maps directions unless there was a recommended route that took less time.) We then assigned the population of each census tract to its shortest route.

revisit the estimates of routes assumed for convenience center traffic and include potentially impacted intersections along Montaña Road in the analysis.

Trip timing

The city has noted that convenience center trips will be greatest during mid-morning and mid-afternoon (but not during the area's peak traffic times).⁴⁰ The Design Memorandum [1] indicates that the facility will be sized to handle 70% of the tonnage unloading over four hours, or 207 vehicles during the peak unloading hour (although the time of this peak is not specified).

The only estimate of convenience center traffic during the peak hours comes from the Draft Traffic Study, which assumes that one third of the convenience center traffic is spread between the three peak hours as follows: 12 round trips during the morning peak hour, 20 trips during the mid-day peak hour, and 16 trips during the afternoon peak hour (for 24, 40, and 32 one-direction trips respectively). These estimates are not justified or explained. Peaking patterns on weekends would likely differ from weekdays. We recommend that this assumption be justified or that traffic count data be collected at the three convenience centers to determine the actual timing of convenience center trips on weekdays and weekends.

Table 2 summarizes the range of convenience center estimates presented by the City and the estimates arrived at in this study.

Transfer trucks

Waste will be transferred from the WTS to the landfill each day by 18-wheeler trucks. Most WTS documents estimate 65 round trips (or 130 one-way trips) per weekday for these transfer trucks in 2018.⁴¹ The exception is the Design Memorandum [1], which estimates 68 transfer truck trips. The City Slide presents the only estimate of weekend activity, indicating that there will be four transfer truck trips per day on weekends [4].

The basis for the estimates of weekday transfer trucks presented by the City are not described in the Draft Traffic Study [2], the City FAQ website [6], the April 2015 and July 2015 community meeting presentations [8, 9], or the City Slide [4]. Two sources do provide details that underpin their estimates: the 2014 Feasibility Study [3] and the Design Memorandum [1]. The estimates are based on assumptions about the trucks' capacity and the amount of waste that is transported. However, these estimates appear to be based on current volumes of waste dropped off by collection

⁴⁰ The City Slide indicates that peak convenience center usage will occur from 9 am to 11 am and 2 pm to 4 pm [4]. Similarly, the City FAQ indicates that most visits will occur in the mid-morning or early afternoon [6]. However these documents have not provided an indication of the share of trips that occur at each time of the day, and according to correspondence with the City, no traffic counts were conducted at the convenience centers (Personal communication from Jill Holbert to Kristine Suozzi, June 25, 2015) so we cannot verify the timing of convenience center trips.

⁴¹ See the April 2015 and July 2015 community meeting presentations [8, 9], City FAQ website [6], 2014 Feasibility Study [3], Draft Traffic Study [2], and City Slide [4].

Table 2: Convenience center trip estimates presented by the City and estimated in this report. Round trips per day are shown.

| Current weekday at all three convenience centers | Proposed WTS weekday | Current weekend at all three convenience centers | Proposed WTS weekend | Notes |
|--|----------------------|--|----------------------|---|
| [implies 600] | 150 | | | Draft Traffic Study "recycling drop-off center" trips assume 25% diversion from existing convenience centers. City FAQ clarifies that the Draft Traffic Study estimates refer to convenience center traffic and are based on 150 trips per day [6]. |
| | 225 | | 350 | City FAQ estimate of vehicles using the convenience center [6]. These values are consistent with the Edith presentation slide deck "public" trips (which seem to be shown as one-way trip counts, so are twice the value shown here) [9]. |
| [implies 600] | 150 - 180 | | | March 30, 2015 letter to Kyle Silfer N Valley Coalition assumes 25-30% diversion from existing convenience centers [13]. |
| [implies 598] | 150 - 300 | | | Design Memorandum [1] assumes 25-50% diversion from convenience centers yields 149 - 299 customers/day. |
| 255 at Eagle Rock and Montessa | | 762 at Eagle Rock and Montessa | | Emails Nov 5, 2014 and Nov 12, 2014 from Betty Green (CABQ) to Byron Gatwood, with total traffic counts for Montessa Park (March 17 to 21 2014 and April 12 to 13 2014) and Eagle Rock (April 7 to 11 2014 and March 22 to 23 2014) |
| 297 | | 885 | | Trip estimates from Betty Green email (above) scaled to all three convenience centers based on waste tonnage presented in the 2014 Feasibility Study. |
| [implies 900] | | [implies 1200] | | Design Memorandum [1] peak estimate for "self-haul" area (based on 2014 waste data), which was based on the worst case scenario of all existing convenience center drop-offs ⁴² . |
| 158 - 478 | | | 470 - 637 | SSR 2018 estimate. Assumes 1.5% annual growth and 50% diversion from existing convenience centers. |

⁴² Personal communication from Jill Holbert to Kristine Suozzi on June 25, 2015.

trucks only.⁴³ We recommend that the traffic study estimates of transfer truck trips account for the growth in waste collected as well as the waste that will be dropped off at the convenience center.

In this report, we break down the capacity and typical waste quantity estimates to arrive at an estimate that accounts the growth in waste collected and the additional waste dropped off at the convenience center.

The truck capacities are reported at 22 tons per trailer in the Design Memorandum [1] and at 24 tons per trailer in the 2014 Feasibility Study [3]. We use an estimate of 22 to 24 tons per trailer. We note that truck capacities can vary depending on the truck used. We recommend that the traffic study either provide justification of the tons per trailer assumed or rely on a conservative assumption.

The number of transfer truck trips per weekday and weekend day depends on the volume of waste that is transported. The 2014 Feasibility Study indicates that 404,000 tons of waste per year is currently collected and 54,687 tons per year are dropped off at the three convenience centers. We estimate that approximately 1% to 3% of the City's collection vehicle waste is collected on Saturdays, while the remainder is collected on weekdays.⁴⁴ We estimate that 38% to 54% of convenience center waste is collected on Saturdays and Sundays.⁴⁵ Assuming a 1.5%

⁴³ The 2014 Feasibility study estimates transfer trips based on the 2010 waste quantity of 404,000 tons (which are approximately equivalent to current waste volumes of 405,000 tons assumed for collection trucks in Appendix C of the 2014 Feasibility Study). It notes that "if SWD receives waste from the convenience centers and/or other private collection companies, additional trucks will be needed" (pg 3.) Overall the Feasibility Study estimates are rough. In distributing annual waste volumes, they assume five days per week of collection (although a small portion of collection will occur on Saturday).

The more recent Design Memorandum weekday transfer truck trip estimates are based on 2014 annual waste tonnage transported to the landfill (1,500 tons per day.) The Design Memorandum also presents convenience center waste estimates of 202 tons per day (which are not included in the 1,500 estimate) and peak daily tonnage estimates of 1,600 to 1,700 tons per day currently. The Design Memorandum does provide estimates of weekday collection and weekend self haul activities, although it does not evaluate transfer truck trips on the weekends. It is difficult to consistently split assumptions into weekdays and weekends using information in the Design Memorandum because it focuses on peak activities and presents annual estimates of waste.

⁴⁴ The April 2015 community meeting presentation estimates transfer trips of 65 per weekday on weekdays and 4 per day on weekends (we assume this applies to Saturday only, when collection vehicles are active) [9], yielding an estimated 1.2% of collection waste transported on weekends. Additionally, the City Data Table indicates that there are 268 landfill trips each weekday and 36 landfill trips on Saturdays [5], yielding an estimated 2.6% of collection waste transported on weekends.

⁴⁵ These two estimates (54%, 38%) determined as follows:

Convenience center transaction information for Eagle Rock (3/22/14 to 3/23/14 and 4/7/14 to 4/11/14) and Montessa (3/17/14 to 3/21/14 and 4/12/14 to 4/13/14) was provided in an email correspondence with the City of Albuquerque (to Byron Gatwood from Betty Green on November 9, 2014 and November 12, 2014). The data indicate that visitation is 255 trips per weekday and 762 trips per weekend day at two of the convenience centers, yielding an estimated 54% of convenience center drop-offs on the weekend.

annual growth rate for waste and a 50% diversion of waste to the WTS from the three convenience centers yields weekday waste volumes of 1,651 to 1,702 tons per day and Saturday waste volumes of 189 to 398 tons per day.^{46 47}

Combining these waste estimates with the truck capacity of 22 to 24 tons, we estimate 69 to 77 transfer truck trips per day on weekdays and 8 to 18 transfer truck trips per day on Saturdays.

Trip routes

The Draft Traffic study states that the most direct route to the landfill is to take Comanche Road to I-25 Southbound. This route seems reasonable. Under Design Plan C, transfer trucks will enter and exit the WTS from Edith Blvd NE. Under Design Plan D, transfer trucks will enter and exit the WTS from Rankin Road (via Comanche Road.)

Trip timing

The City Slide indicates that the transfer truck trips will occur regularly from 8:30 am to 4 pm with one final trip at 5:30 pm [4] The Draft Traffic study assumes that all transfer trips occur during the mid-day or PM peak in order to evaluate the worst case scenario; trips are split evenly between the two peak hours. The latter estimate seems reasonable and the former is conservative; either would be appropriate for the traffic analysis.

Total Trips

Summing the trips estimated in the sections above yields total new trip estimates of 390 to 732 trips per weekday and 528 to 680 trips per weekend day (Table 3). Summing only the trips made by City trucks (which may have greater impacts than passenger vehicle trips) yields 232 to 254 truck trips per weekday and 33 to 43 trucks trips per weekend day. The ranges presented here exceed trip estimates arrived at by summing the City's trips estimates.

The City estimates 225 weekday and 350 weekend trips per day to the convenience center, yielding an estimated 38% of trips on weekends (assuming trips occur seven days per week).

⁴⁶ We focus on Saturdays as the worst case weekend day because 1) the City's baseline traffic counts for the weekend indicate that traffic volumes are higher on Saturday than on Sunday, 2) collection trucks travel on Saturdays but not Sundays, and 3) in the absence of convenience center traffic data we assume that weekend convenience center trips are divided equally between Saturday and Sunday.

⁴⁷ Weekday collection and convenience center volumes are estimated at 1,600 to 1,633 tons per day and 51 to 69 tons per day respectively. Saturday collection and convenience center volumes are 82 to 247 tons per day and 106 to 151 tons/day respectively. We assume that weekday collection occurs for five days per week and 52 weeks per year, weekend collection occurs for one day per week and 52 weeks per year, and convenience center drop-off occurs for seven days per week and 52 weeks per year. We also assume that convenience center drop-offs on Saturday and Sunday are equal in the absence of detailed data.

Table 3: Total new trips estimated based on City data and in this report (new round trips per day).

| | Weekdays | | Weekends | | Comments |
|---|-----------------------------------|----------------------|----------------------|----------------------|--|
| | City | SSR | City | SSR | |
| Collection | 125 - 149 | 163 - 177 | 20 - 24 | 25 | SSR estimate accounts for growth in waste in 2018. Weekend estimate is for Saturday. |
| Convenience, Recycling, Household Hazardous Waste, Re-Use | 150 - 300 | 158 - 478 | 350 | 470 - 637 | SSR estimate accounts for growth in waste drop-off trips in 2018 and assumes a 50% diversion rate from existing convenience centers. Range reflects uncertainty over trips to existing convenience centers. City estimate assumes 25-50% diversion rate on weekdays and an unspecified diversion rate on weekends. Neither estimate includes hazardous waste, re-use, or recycling drop-off. |
| Transfer | 65 - 68 | 69 - 77 | 4 | 8 - 18 | SSR estimate accounts for growth in waste in 2018 and transport of convenience center waste drop-off. Range reflects uncertainty in trailer capacity and waste estimates. Weekend estimate is for Saturday. City weekend estimate does not specify assumptions. |
| Total trips for all vehicles | 340 - 517⁴⁸ | 390 - 732 | 374 - 378 | 528 - 680 | Includes collection trucks, transfer trucks, and residential and private self-haul waste drop-offs. |
| <i>Trips for City trucks</i> | <i>190 - 217⁴⁹</i> | <i>232 - 254</i> | <i>24 - 28</i> | <i>33 - 43</i> | Includes collection and transfer trucks. |

Traffic Impacts

In this section we conduct several back-of-the envelope calculations in order to demonstrate the magnitude of some of the potential traffic impacts of the project that might be shown in a traffic analysis that addresses some of the suggestions included in this report. We focus our estimates on the locations and times with available data that are expected to have the greatest impacts. We present our estimates as ranges due to the uncertainties in the estimated new trip rates and

⁴⁸ Trip estimates are arrived at by summing the estimates described in each section. Notes from a public meeting on January 20, 2015 [11] indicate that the site will add approximately 400 – 500 trips per day on Comanche Road, roughly consistent with the round trips estimated by summing the City's estimates (as presented in this table).

⁴⁹ Trip estimates are arrived at by summing the estimates described in each section. Note that in a March 30, 2015 letter to Kyle Silfer of the North Valley Coalition [13] the City indicated that there will be a total of 380 additional truck trips. If these are one-way trips they are equivalent to 190 round trips, as indicated in this table.

routes. Due to time and resource constraints, it is beyond the scope of this analysis to estimate intersection delays for each affected intersection and for each weekday peak period (similar to what was done in the City's Draft Traffic Study).

Weekday traffic volumes in the project area

The majority of project trips will travel along Comanche Road NE between Edith Blvd and the I-25 interchange. The City has indicated that Comanche Road will experience an increase in traffic of approximately 3% as a result of the project.⁵⁰

In Table 4 we present estimated changes in weekday⁵¹ traffic volumes that are expected to occur with the project using the trip and route estimates presented in this report. Our estimates indicate that the greatest changes in traffic volumes will occur along Comanche Road and at the I-25 interchange, and on Edith Blvd (under Design Plan C), where traffic is expected to increase by approximately up to 3% to 7% over 2018 traffic levels. There will also be smaller increases in traffic volumes along other routes in the project area. Figure 4 shows a map of the location of the maximum estimates of project trips.

⁵⁰ According to the March 30, 2015 letter to Kyle Silfer of the North Valley Coalition [13], this increase in traffic is based on an estimated 380 truck trips, conservatively estimated as 400 trips out of 16,500, which results in a 2.5% increase in traffic. An email from the City (from John Soladay to Kitty Richards on May 14, 2015) also indicates that 380 truck trips per weekday added to 16,500 to 23,800 trips per weekday results in less than a 3% increase in traffic. The FAQ also indicates less than a 3% increase in traffic based on baseline traffic of 16,500 [6]. The 16,500 to 23,800 values are based on MR COG 2013 traffic flow data, and they refer to traffic in both directions. The 380 truck trips also seems to refer to traffic in both directions, or 190 round trips (the city has estimated 65 transfer trucks trips plus 125 collection truck trips, as described above).

⁵¹ We focus our analysis on weekdays due to the data available and because baseline traffic levels appear to be substantially lower on weekends than on weekdays (based on weekend traffic counts provided in a personal communication from Jill Holbert to Kitty Richards on June 12, 2015 and weekday traffic counts in Appendix B of the Draft Traffic Study), and because the majority of truck trips will occur on weekdays, although we note that convenience center traffic will likely be greater on weekends than weekdays.

Table 4: Weekday traffic volumes in the project area with and without the proposed WTS. Changes that exceed 1% are highlighted in **bold**.

| | | Weekday Traffic Volumes (one-way trips/day) | | | | | |
|------------------------------|---|---|-----------------------------|----------------------------|-------|------------------------|------------|
| | | 2012 ⁵² | 2018 baseline ⁵³ | 2018 project ⁵⁴ | | % change ⁵⁵ | |
| | | | | min | max | min | max |
| Griegos Road / Comanche Road | West of 4 th Street | 10,756 | 11,305 | 13 | 25 | 0.1 | 0.2 |
| | 4 th Street to 2nd | 13,056 | 13,722 | 17 | 42 | 0.1 | 0.3 |
| | 2 nd Street to Edith Blvd | 13,184 | 13,857 | 41 | 124 | 0.3 | 0.9 |
| | Edith Blvd to Alexander | 16,680 | 17,531 | 698 | 1,254 | 4.0 | 7.2 |
| | Alexander - Pan American West | 24,159 | 25,391 | 698 | 1,254 | 2.7 | 4.9 |
| | Pan American Fwy W to I-25 overpass | 24,484 | 25,733 | 217 | 1,057 | 0.8 | 4.1 |
| | Pan American Fwy E to I-25 overpass | 24,819 | 26,085 | 217 | 1,057 | 0.8 | 4.1 |
| | East of I-25 | 20,343 | 21,381 | 56 | 172 | 0.3 | 0.8 |
| Edith Blvd | Site Access to Comanche/Griegos Road (Design C) | 11,629 | 12,222 | 335 | 391 | 2.7 | 3.2 |
| | Candelaria Road to Comanche/Griegos Road (Design D) | 11,629 | 12,222 | 6 | 19 | 0.1 | 0.2 |
| | Comanche/Griegos Road to Montaña Road North of Montaña Road | 15,011 | 15,777 | 47 | 103 | 0.3 | 0.7 |
| | | 14,379 | 15,112 | 11 | 28 | 0.1 | 0.2 |
| 2 nd Street | Candelaria Road to Comanche/Griegos Road | 18,989 | 19,958 | 9 | 23 | 0.0 | 0.1 |
| | Comanche/Griegos Road to Montaña Road | 17,820 | 18,729 | 27 | 78 | 0.1 | 0.4 |
| | North of Montaña Road | 22,044 | 23,168 | 40 | 90 | 0.2 | 0.4 |

⁵² 2012 data are obtained from the Mid Region Council of Government via <http://taqa.mrcog-nm.gov>. Values represent the average weekday traffic volume.

⁵³ Estimated from the 2012 value using a 1% annual growth rate (consistent with the baseline traffic growth assumed in the Draft Traffic Study).

⁵⁴ New project trips are estimated based on the trip rates and routes presented in the previous section and are added to 2018 "no project" volumes. Note that the residential truck route shares vary by weekday; this analysis assumes the maximum share for any weekday along each route in order to evaluate the worst weekday impacts.

⁵⁵ Increases of over 1% are shown in **bold**.

| | | Weekday Traffic Volumes (one-way trips per day) | | | | | |
|--|--|---|------------------|--------------|-----|------------|------------|
| | | 2012 | 2018 baseline | 2018 project | | % change | |
| | | | | min | max | min | max |
| 4 th Street | Candelaria to Comanche/Griegos Road | 22,635 | 23,790 | 11 | 23 | 0.0 | 0.1 |
| | Comanche / Griegos Road to Montaña Road | 23,420 | 24,615 | 6 | 6 | 0.0 | 0.0 |
| | North of Montaña Road | 15,859 | 16,668 | - | - | 0.0 | 0.0 |
| Montaña Road | West of 4 th Street | 25,149 | 26,432 | 25 | 76 | 0.1 | 0.3 |
| | 4 th Street to 2 nd Street | 26,737 | 28,101 | 34 | 85 | 0.1 | 0.3 |
| | 2 nd Street to Edith Blvd | 23,268 | 24,455 | 37 | 80 | 0.2 | 0.3 |
| I-25 NB | North of Comanche Road on ramp | 97,809 | 102,798 | 41 | 72 | 0.0 | 0.1 |
| | South of Comanche Road off ramp | 87,667 | 92,139 | 282 | 506 | 0.3 | 0.5 |
| I-25 SB | N of Comanche Road off ramp | 84,311 | 88,612 | 38 | 62 | 0.0 | 0.1 |
| | South of Comanche Road on ramp | 10,039 | 10,551 | 286 | 515 | 2.7 | 4.9 |
| I-25 Pan American Fwy E (NB frontage) | North of Comanche Road to I-25 on ramp | 18,786 | 19,744 | 41 | 72 | 0.2 | 0.4 |
| | South of Comanche Road to I-25 off ramp | 23,518 | 24,718 | 282 | 506 | 1.1 | 2.0 |
| I-25 Pan American Fwy W (SB frontage) | North of Comanche Road to I-25 off ramp | 13,286 | 13,964 | 38 | 62 | 0.3 | 0.4 |
| | South of Comanche Road to I-25 on ramp | 15,523 | 16,315 | 286 | 515 | 1.8 | 3.2 |
| I-25 NB ramps to/from frontage | Comanche Road on ramp | 12,347 | 12,977 | 41 | 72 | 0.3 | 0.6 |
| | Comanche Road off ramp | 6,769 | 7,114 | 282 | 506 | 4.0 | 7.1 |
| I-25 SB ramps to/from frontage | Comanche Road on ramp | 9,779 | 10,278 | 286 | 515 | 2.8 | 5.0 |
| | Comanche Road off ramp | 8,838 | 9,289 | 38 | 62 | 0.4 | 0.7 |

Daily truck volumes in the project area

Many of the air quality, noise, safety, and bike/pedestrian accommodation impacts of new trips (discussed in subsequent sections) are more severe where new trips consist of heavy truck trips. We therefore evaluate new truck trips (from new collection and transfer trucks) along the routes near the project, as shown in Table 5. Comanche Road, Edith Blvd (under Design Plan C only), and I-25 are the primary routes that will be used by collection and transfer trucks, although a number of other roads in the area will also likely carry new truck trips. Figure 4 shows a map of the location of the maximum estimates of project truck trips.

We estimate that the number of truck trips traveling on Comanche Road between Edith Blvd and the I-25 interchange will increase by approximately 47% to 151% on weekdays.⁵⁶

Weekday afternoon peak traffic volumes along key roadways

The weekday afternoon peak period has higher traffic volumes than the other peak periods for the intersections examined in the Draft Traffic Study [2, Appendix B]. We evaluate the change in traffic volumes during the weekday afternoon peak for several potentially impacted roadway segments in the project area⁵⁷. Table 6 shows changes in traffic volumes as well as changes in volume-to-capacity (V/C) ratios. Figure 5 shows the location of the estimated afternoon peak hour trips.

We find that the greatest traffic impacts are expected on Comanche Road, with estimated traffic volume increases of up to 6% during the afternoon peak period. Additionally, a number of other roadway segments in the project area that currently exhibit congestion will likely experience modest traffic increases during the afternoon peak period. Notably, the projected traffic at Montaña Road intersections is not accounted for in the five intersections examined in the Draft Traffic Study.

⁵⁶ 2018 baseline truck traffic is estimated as follows: Based on Appendix B of the Draft Traffic Study, we estimate the share of traffic along Comanche Road between Edith Blvd and I-25 that is trucks during the three observed peak periods: 1.8% (258 / 13,980 on the Edith side) to 3.8% (550 / 14,599 on the I-25 side). In the absence of vehicle mix data for a full day and given that most traffic occurs during peak periods, we assume that these ratios hold for the entire day. Combining this information with the 16,680 to 24,159 2018 weekday traffic estimates from Table 4, we estimate 324 to 957 daily truck trips (one-way) on Comanche Road in 2018 without the project. Combining this with the estimated new truck trips along Comanche Road shown in Table 5 (for the segments between Edith Blvd and Pan American Freeway W) yields a 47% to 151% increase in truck trips.

⁵⁷ These road segments are identified based on meeting two criteria: 1) exhibiting congestion in the baseline case (with high baseline PM peak volume to capacity (V/C) ratios, equal to 1 or greater according to 2012 roadway V/C data provided by MR COG) and 2) carrying a number of project trips during the afternoon peak (routes with greater than 4% of convenience center, commercial collection, or transfer truck trips as shown in Appendix A, with no consideration of new residential collection trip routes because they are not expected to occur during the afternoon peak period according to the City Slide [4].)

Table 5: New weekday collection and transfer truck trips that are expected to result from the WTS.

| | | 2018 new project truck trips ⁵⁸ (one way trips per day) | |
|---------------------------------------|---|--|-----|
| | | min | max |
| Griegos Road / Comanche Road | West of 4 th Street | 6 | 6 |
| | 4 th Street to 2 nd | 4 | 4 |
| | 2 nd Street to Edith Blvd | 0 | 0 |
| | Edith Blvd to Alexander | 445 | 489 |
| | Alexander - Pan American West | 445 | 489 |
| | Pan American Fwy W to I-25 overpass | 160 | 340 |
| | Pan American Fwy E to I-25 overpass | 160 | 340 |
| | East of I-25 | 15 | 48 |
| Edith Blvd | Site access to Comanche/Griegos Road (Design C) | 329 | 372 |
| | Candelaria Road to Comanche/Griegos Road (Design D) | 0 | 0 |
| | Comanche/Griegos Road to Montaña Road North of Montaña Road | 28 | 46 |
| | | 4 | 9 |
| 2 nd Street | Candelaria Road to Comanche/Griegos Road | 4 | 8 |
| | Comanche/Griegos Road to Montaña Road North of Montaña Road | 4 | 8 |
| | | 24 | 42 |
| 4 th Street | Candelaria to Comanche/Griegos Road | 4 | 4 |
| | Comanche Griegos Road to Montaña Road North of Montaña Road | 6 | 6 |
| | | 0 | 0 |
| Montaña Road | West of 4 th Street | 0 | 0 |
| | 4 th Street to 2 nd Street | 8 | 8 |
| | 2 nd Street to Edith Blvd | 24 | 42 |
| I-25 NB | North of Comanche Road on ramp | 33 | 48 |
| | South of Comanche Road off ramp | 184 | 209 |
| I-25 SB | N of Comanche Road off ramp | 33 | 48 |
| | South of Comanche Road on ramp | 184 | 209 |
| I-25 Pan American Fwy E (NB frontage) | North of Comanche Road to I-25 on ramp | 33 | 48 |
| | South of Comanche Road to I-25 off ramp | 184 | 209 |
| I-25 Pan American Fwy W (SB frontage) | North of Comanche Road to I-25 off ramp | 33 | 48 |
| | South of Comanche Road to I-25 on ramp | 184 | 209 |
| I-25 NB ramps to/from frontage | Comanche Road on ramp | 33 | 48 |
| | Comanche Road off ramp | 184 | 209 |
| I-25 SB ramps to/from frontage | Comanche Road on ramp | 184 | 209 |
| | Comanche Road off ramp | 33 | 48 |

⁵⁸ Estimated as in Table 4 except excluding convenience center trips.

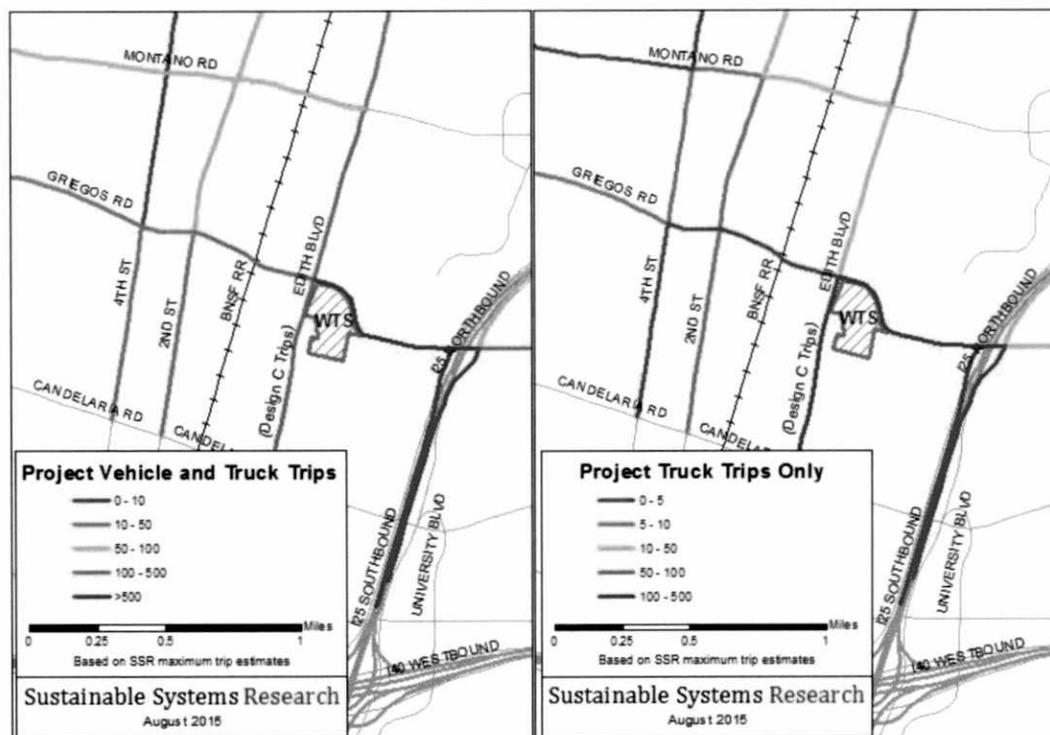


Figure 4: Estimated 2018 Weekday Project Trips. Maximum estimated one-directional trip values from Table 4 and Table 5 are shown. Values shown for each segment represent the greatest traffic levels that may occur on that segment and in some cases they will only occur on part of the road segment. For example, the values shown for Edith Blvd south of Comanche Road/Griegos Road are based on Design Plan C and will occur in the immediate project vicinity (extending from Comanche Road/Griegos Road to the site access point along Edith Blvd but not further south). Traffic levels will be lower than what is shown on Edith Blvd between the site access point and Candelaria Road.

Table 6: Weekday Afternoon Peak Traffic Estimates for Select Locations in the Project Vicinity.

| | Traffic Volume (trips per hour) | | | | | | Traffic Congestion (V/C ratio) ⁵⁹ | | | |
|--|---------------------------------|-----------------------------|---|---|---------------------|------|--|---------------|-------------------------|------|
| | 2012 | 2018 baseline ⁶⁰ | 2018 project ⁶¹ min ⁶² | 2018 project ⁶¹ max ⁶³ | % change min max | | 2012 | 2018 baseline | 2018 project min max | |
| Comanche Road WB (I-25 SB frontage to Alexander Blvd) | 1196 | 1270 | 22 | 80 | 2% | 6% | 1.00 | 1.06 | 1.08 | 1.12 |
| Comanche Road WB (under I-25 overpass) | 1438 | 1526 | 22 | 78 | 1% | 5% | 1.20 | 1.27 | 1.29 | 1.34 |
| Griegos Road WB (Edith Blvd - 2nd St) | 751 | 797 | 2 | 5 | 0.2% | 0.7% | 1.25 | 1.33 | 1.33 | 1.34 |
| I-25 NB on ramp (north of Comanche) | 1215 | 1290 | 1 | 3 | 0.1% | 0.2% | 1.52 | 1.61 | 1.61 | 1.62 |
| Pan American Freeway East (I-25 NB frontage road, south of Comanche) | 4406 | 4677 | 20 | 71 | 0% | 2% | 1.73 | 1.83 | 1.84 | 1.86 |
| Montaño Road EB (2 nd to 4 th) | 2553 | 2710 | 1 | 4 | 0.0% | 0.2% | 1.60 | 1.69 | 1.69 | 1.70 |
| Montaño Road WB (2 nd to 4 th) | 2348 | 2492 | 1 | 4 | 0.1% | 0.2% | 1.47 | 1.56 | 1.56 | 1.56 |
| Montaño Road WB (Edith to 2 nd) | 1917 | 2035 | 1 | 4 | 0.1% | 0.2% | 1.20 | 1.27 | 1.27 | 1.27 |
| Montaño Road WB (west of 4th St) | 1624 | 1724 | 1 | 4 | 0.1% | 0.2% | 2.03 | 2.15 | 2.16 | 2.16 |
| Edith Blvd NB (Griegos to Montaño) | 1065 | 1131 | 2 | 5 | 0.1% | 0.5% | 1.78 | 1.88 | 1.89 | 1.89 |
| Edith Blvd NB (Site Access to Griegos, Design C) | 1631 | 1731 | 10 | 41 | 0.6% | 2.3% | 2.72 | 2.89 | 2.90 | 2.95 |
| Edith Blvd NB (Candelaria to Griegos, Design D) | 1631 | 1731 | 1 | 2 | 0.0% | 0.1% | 2.72 | 2.89 | 2.89 | 2.89 |

⁵⁹ 2018 V/C ratios assume that the 2012 capacity value applies in 2018 (no capacity improvements, etc.)

⁶⁰ 2018 baseline traffic volume estimates assume a 1% annual growth rate (based on the general traffic growth rate assumed in the Draft Traffic Study.)

⁶¹ 2018 project trips are estimated as described in this report: 53 residential collection trips, 110 to 124 commercial collection trips, 158 to 478 convenience center trips, 69 to 77 transfer trips. Each trip follows the routes described in this report. Trips are allocated to the PM peak as noted below.

⁶² Minimum estimates of the project's 2018 PM peak traffic volumes are based on the lowest hourly estimate of the peak share of project trips occurring during the 3:00 - 6:30 PM peak period. These minimum estimates are: 0% of collection trips (based on the City Slide and the Draft Traffic Study), 11% of convenience center trips (based on the 16/150 share of trips occurring in the PM peak in the Draft Traffic Study), and 13% of transfer truck trips (based on the City Slide assumption of evenly distributed trips from 8:30 am to 4 pm, with a final trip at 5:30 pm). Note that we assume that the afternoon peak share of new project trips occurs at the same time as afternoon peak traffic levels, although they may not precisely coincide. A more detailed estimate would determine the worst project traffic impacts using the count data for the full afternoon peak period (e.g. highest hourly project + baseline volume).

⁶³ Maximum estimates of the project's 2018 PM peak traffic volumes are based on the highest hourly estimate of the share of project trips occurring during the 3:00 - 6:30 PM peak period. These maximum estimates are: 0% of collection trips (based on the City Slide and the Draft Traffic Study), 11% of convenience center trips (based on the average trip rate shown in the City Slide and used in the absence of detailed timing data), and 50% of transfer truck trips (based on the assumption that half of transfer trips occur during the PM peak hour in the Draft Traffic Study).

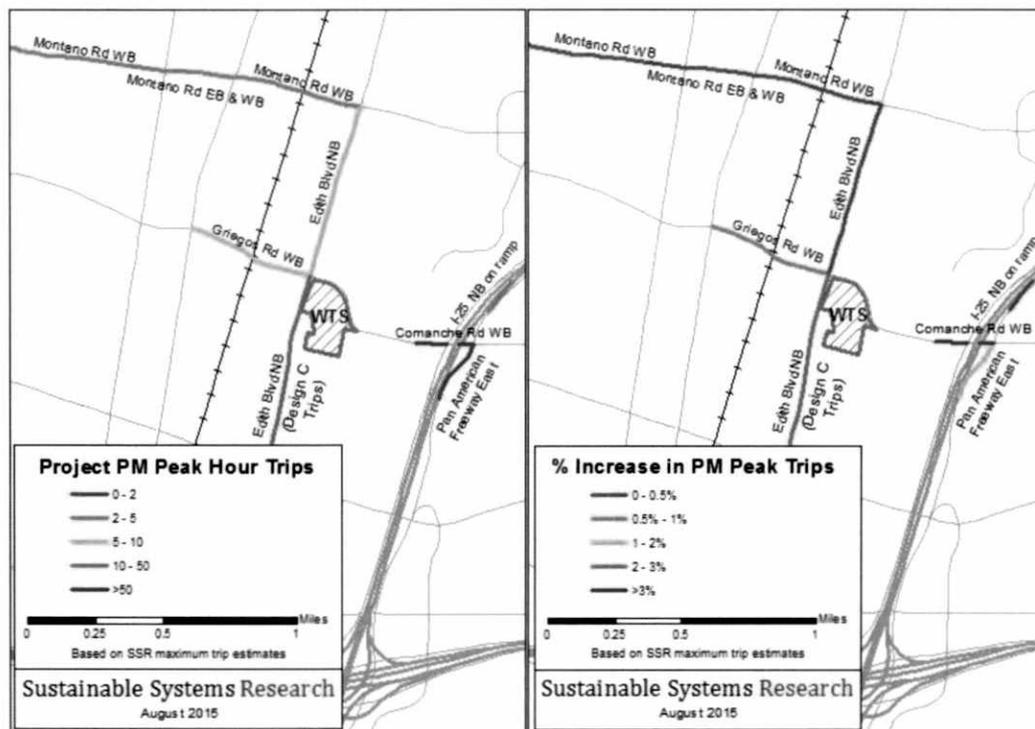


Figure 5: Estimated 2018 Weekday Afternoon Peak Hour Project Trips for Select Locations. Maximum estimated one-directional trip values from Table 6 are shown. Values shown for each segment represent the greatest traffic levels that may occur on that segment and in some cases they will only occur on part of the road segment. For example, the values shown for Edith Blvd south of Comanche Road/Griegos Road are based on Design Plan C and will occur in the immediate project vicinity (extending from Comanche Road/Griegos Road to the site access point along Edith Blvd but not further south). Traffic levels will be lower than what is shown on Edith Blvd between the site access point and Candelaria Road.

Safety Impacts

Roadway safety is a function of the risk of an accident as well as the severity of the accidents that occur. A number of situation-specific factors drive accident risk and severity, including traffic characteristics (e.g. traffic volumes, vehicle speeds and speed differentials, vehicle mix, bicycle and pedestrian volumes), roadway design (e.g. number of lanes, median, road curvature, intersection design), weather conditions, and human factors (e.g. driver or bicyclist or pedestrian behavior, age, use of alcohol or drugs).

The proposed WTS has the potential to affect the traffic characteristics of the area. The relationship between safety and traffic characteristics is complex, with research pointing to mixed effects for many factors that contribute to crash risks and crash severity. However there are a few relationships that are generally supported. We review these relationships below, although we caution that the nature of these relationships may vary in different locations due to variation in conditions.

Traffic flows: Higher flows indicate that more people are on the road, so there is more potential for human error and greater exposure to accident risk. Although higher flows in and of themselves are not generally a safety concern, in general higher vehicle flows are associated with greater *numbers* of crashes for vehicles [14] and pedestrians [15], while the *risk* of an accident is higher for high and low traffic flow rates [14].

Traffic speed: The evidence tying speed to accident risk is mixed (with some studies pointing to greater risks at high speeds and others pointing to lower risks at high speeds) [14], although higher vehicle speeds are positively associated with the severity of a crash in general [16], for cyclists [17] and for pedestrians [18]. Speed differentials may also be important drivers of accidents and accident severity [14, 16].

Trucks: Trucks are larger and heavier than passenger vehicles and they generally have poorer performance characteristics (e.g. acceleration and deceleration.) Truck involvement can be positively related to the severity of a crash (e.g. whether fatalities occur), particularly for bikes [17], pedestrians, and other vehicle occupants [19].

To summarize, safety and exposure to traffic dangers may be worsened when traffic flows increase, speeds increase, and more trucks are on the road (although specific impacts depend on site-specific conditions). As discussed above, the project will likely affect traffic volumes and the share of trucks using the roadway, and it may affect vehicle speeds. The overall magnitude of the project's impacts on safety is unknown, however we highlight a number of locations where concern is elevated.

Traffic volumes (including truck volumes) will have the greatest increases along Comanche Road between Edith Blvd and I-25, on I-25, at the I-25 interchange, and at Edith Blvd adjacent to the project site (under Design Plan C only) (see Table 4 and Table 5.) These factors may contribute to safety impacts along these corridors. The potential for conflicts with bicycles in this area is of particular concern: as described below, Comanche Road has a bike lane and is one of few connections between the North Valley and the Channel Bike Trail in the heights. Unfortunately, the potential for fatal accidents involving waste collection trucks and cyclists was tragically demonstrated on this corridor in 2010⁶⁴ (see Figure 6). Edith Blvd has a bike route where cyclists share the road with vehicles; the additional project trucks that will travel on this corridor under Design Plan C are also of concern.

Locations with project trips overlaid on existing safety issues may also be of concern. The intersection of Montaña Road and 4th Street has been identified as one of the worst intersections in the region in terms of vehicle and bicycle crash rates⁶⁵, and is targeted for pedestrian-oriented improvements under the 4th Street Corridor Plan [23]. The project is expected to result in some additional traffic at Montaña Road and 4th Street (25 to 76 trips per day, see Table 4); some of these additional trips will be trucks (8 trips per day, see Table 5).

Similarly, the intersection of 4th Street and Griegos Road may be of concern, as the crash rate two to three times the average rate in the region [21]. The project is expected to result in some additional traffic at this location (17 to 42 trips per day, see Table 4); some of these additional trips will be made by trucks (6 additional trips per day, see Table 5).

Finally, we note that the design of the site may affect the risk of accidents and the accident severity for bicyclists, pedestrians, drivers, and passengers traveling along affected corridors if there are changes in the roadway design at access points (or elsewhere) or if there is site traffic queuing onto adjacent arterials.

⁶⁴ Cyclist Timothy Vollmann was killed when he collided with a City waste collection truck at the Comanche / I-25 interchange in December 2010 [20].

⁶⁵ Montaña Road and 4th Street was identified as one of the top 20 intersections in the region in terms of crashes per traffic volume (See [21], based on 2007 - 2011 data) and one of the top 11 intersections in the City in terms of the number of bike crashes (See [22], based on 2008-2011 data.)



Figure 6: Ghost bike at the northeast intersection of Comanche and Pan American Freeway East (the I-25 NB frontage road). The ghost bike marks the approximate location of cyclist Timothy Vollman's fatal collision with a City waste collection truck.

Bike/Pedestrian/Transit Accommodation Impacts

Travelers who bike, walk, or walk to transit benefit in terms of their health, due to increased physical activity levels. Additionally, if they use these modes instead of driving a car, traffic and air quality impacts are marginally reduced.

The new trips associated with the proposed WTS have the potential to adversely impact bicycle and pedestrian accommodation along corridors in the project area. In general, higher vehicle volumes and truck traffic can compromise bicyclists' comfort.⁶⁶ Similarly, higher vehicle volumes and speeds can compromise pedestrians' comfort.⁶⁷ These impacts may be non-trivial when the level of service is already poor and is marginally close to degrading (e.g. from D to E). Additionally, stakeholder interviews with residents of Albuquerque indicate that better perceptions of safety would make bicycling more desirable [22]; as described in the safety section above, the proposed WTS may raise safety concerns for bicyclists and pedestrians at a number of locations.

⁶⁶ The 2010 Highway Capacity Manual (HCM) includes a measure of bicycle LOS, which is a function of the proportion of heavy vehicle traffic, as well as overall motorized vehicle volumes, in addition to other measures [24]. This is based on research on bicyclists' perceptions.

⁶⁷ According to the 2010 Highway Capacity Manual, pedestrian LOS is also a function of traffic volumes and speeds [24]. This is based on research about how pedestrians perceive walking on facilities with different characteristics.

A number of the roads in the area are critical routes for bicycles, pedestrians, and transit users. Several critical bicycle facilities are present on corridors where project trips are expected to occur (Figure 7), and several improvements are planned (Table 7). The major roads in the project area have also been classified by the Mid Region Council of Governments as moderate (or greater) priorities for pedestrian improvements (these include Griegos Road, Edith Blvd, 2nd Street, Montaña Road, and 4th Street, each spanning the project area.)⁶⁸ Additionally, there are a number of transit facilities on potentially affected routes (Figure 8); Route 13 (on Comanche Road east of 2nd Street and on 2nd Street south of Comanche Road), Route 10 (on 4th Street extending south of Candelaria Road and north of Montaña Road, with service along 2nd Street via Griegos Road and Montaña Road), Route 157 (on Montaña Road extending west of 4th Street and east of Edith Blvd), and the Montaña Transit Center (south of Montaña Road and west of the Rail Runner station.)

These bike, pedestrian, and transit facilities are critical routes for non-auto travel in the region, and many of the facilities are currently in need of improvement. Some of the potentially impacted facilities may already be undesirable for some non-auto users (e.g. see Figure 9). The gap in bike facilities (noted in Table 7) and the lack of pedestrian facilities, such as sidewalks (see Figure 10) in the vicinity of La Luz Elementary School are of particular concern, as children walk and bike to and from the school. Bike, pedestrian, and transit facilities are also crucial components of the 4th Street Corridor Plan [23], which plans for mixed use and transit-oriented development and improved accommodations for pedestrians on 4th Street (from just south of Montaña Road to the City limits to the north).

⁶⁸ See <http://www.mrcog-nm.gov/images/stories/transportation/bicycles/pedestrian-composite-index-scores.jpg>.

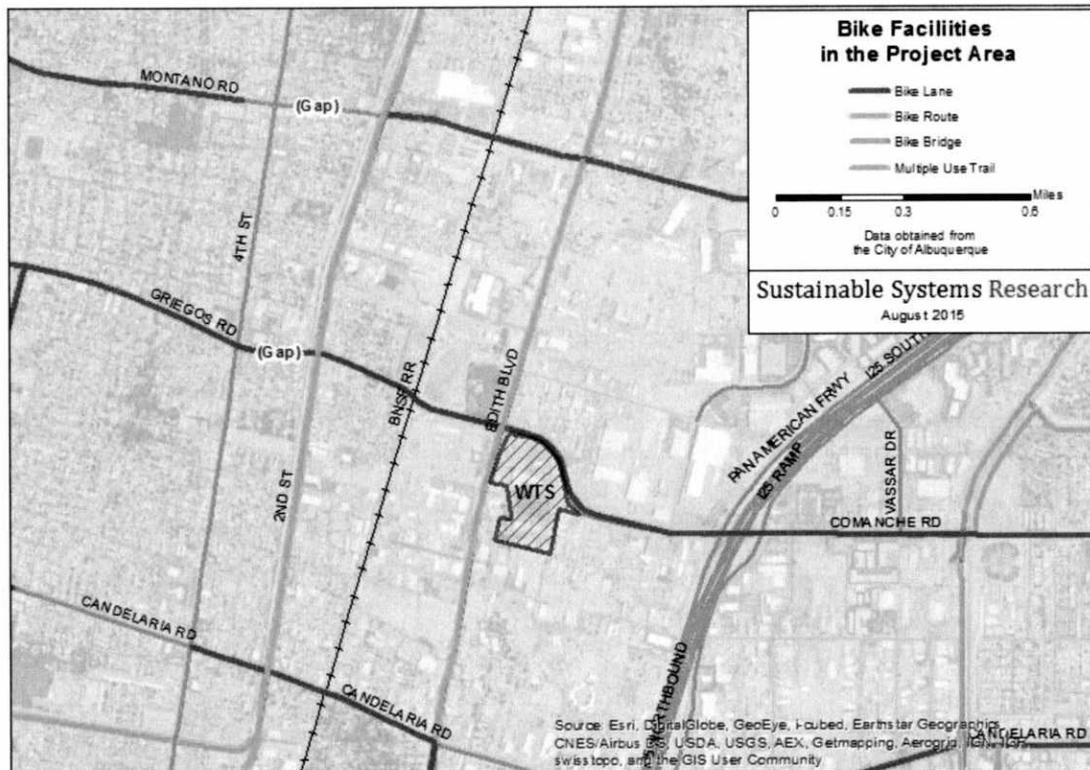


Figure 7: Bike Facilities in the Project Area. The facility segments shown are based on the City of Albuquerque shapefile. The presence of a bike lane shown on Griegos between 5th Street and 1 block east of 2nd Street does not agree with the data sources used in Table 7 and appears to be an error; we have labeled that location as having a gap.

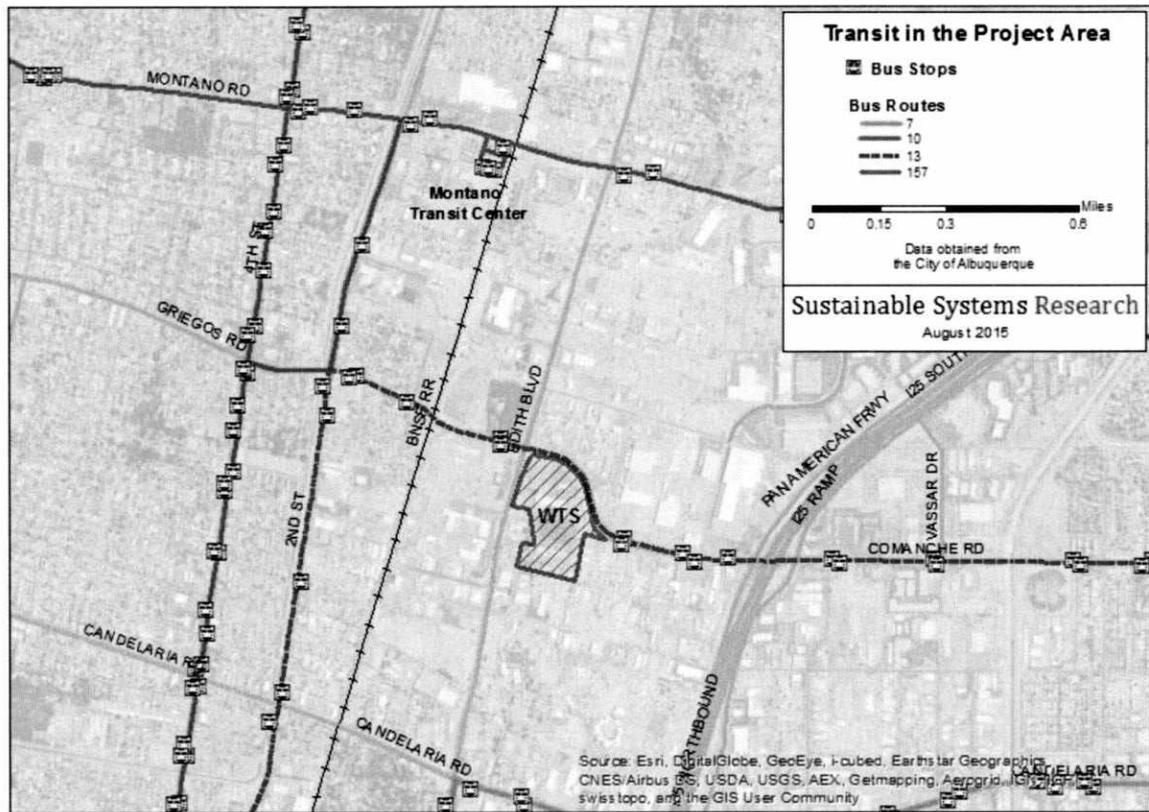


Figure 8: Transit Facilities in the Project Area.

Table 7: Current and planned bicycle facilities in the project area.

| Road | Section in the project area | Current facilities ⁶⁹ | Comments | Planned facilities ⁷⁰ | Comments |
|-------------------------|----------------------------------|----------------------------------|--|--|--|
| Comanche / Griegos Road | W of 4 th – E of I-25 | Bike lane | Gap: 5 th St - 1 block E of 2 nd St: in front of La Luz Elementary | Fill gap. | This is a "critical link" improvement in BTFP. Provides a link from the North Valley to the Channel Trail. |
| Montaño Road | W of 4 th – E of I-25 | Bike lane | Gap: 5 th St - 2 nd St | Fill gap. Intersection improvement at 4 th & Montaño. | These are "critical link" improvements in BTFP. |
| 2 nd Street | N of Montaño - S of Candelaria | Bike route | Bikes share road with cars. | Bike lane and bike trail. | These are "critical link" improvements in BTFP. There is currently no N-S bike lane in the area. |
| Edith Blvd | N of Montaño - S of Candelaria | Bike route | Bikes share road with cars. One of very few N-S bike facilities in the area. | -- | -- |

⁶⁹ Current facilities are shown on the City of Albuquerque bike map: <http://www.cabq.gov/parksandrecreation/recreation/bike/bike-map>

⁷⁰ Planned facilities are indicated in the Mid Region Council of Governments Long Range Bikeway System 2040 map, and in the City of Albuquerque's Bikeways & Trails Facilities Plan (BTFP), completed in May 2015 (see Figures 11 and 16).



Figure 9: Bicyclist using the sidewalk instead of the bike lane on Comanche Rd adjacent to the site of the proposed WTS. Photograph from Google Maps' StreetView.



Figure 10: Dirt sidewalk at the southwest corner of Griegos Road and 2nd Street (at the edge of a school zone and at a bus stop).

New trips generated by the project have the potential to further impact these facilities, particularly where truck traffic will increase. Comanche Road, which has a bike lane, will carry the greatest number of new trips (including truck trips) of the

arterials in the project area (see Table 4 and Table 5). Edith Blvd, which has a bike route, will also carry a majority of truck trips adjacent to the site (under Design Plan C). Griegos Road, 2nd Street, 4th Street, and Montañó Road will also carry new project trips (including truck trips). The bike routes on 2nd Street and Edith Blvd may be particularly vulnerable to impacts of additional trips because bicyclists are not separated from higher speed vehicle traffic on those routes. The gaps in bike infrastructure along Griegos Road and Montañó Road may also be vulnerable to additional project traffic. Comanche Road, 2nd Street, Griegos Road, 4th Street, and Montañó Road also carry bus lines.

The Draft Traffic Study mentions the current bike and transit facilities in the project area. In the projected traffic section, it indicates that the current level of bike and pedestrian activity is unknown. (Although the pedestrian counts shown in Appendix B shows 27 to 62 pedestrians at each of the five study intersections during the three peak periods.)⁷¹ The projected traffic section also indicates that the project is not expected to add any new non-auto trips. However, the Draft Traffic Study does not discuss planned bicycle facilities in the area or evaluate non-auto impacts of the new vehicle trips.

In light of the potential impacts of increased traffic volumes (particularly the increase in trucks) along corridors with critical bicycle, pedestrian, and transit facilities that are already in need of improvement, we strongly recommend more serious consideration of the potential impacts on bicycle, pedestrian, and transit travel (and potential mitigations) in the project area.

Air Quality Impacts

Air pollution comes from a number of different types of emissions sources, including mobile (on- and off-road) and stationary sources (e.g. industrial combustion and fugitive emissions.) The proposed WTS is also located near the edge of an industrial area (see zoning in Figure 11) with a number of stationary pollution sources⁷², as well as near a number of heavily traveled roads (including I-25, Montañó Road, and others: see Table 4).

Vehicles directly emit several pollutants that can result in health impacts: carbon monoxide (CO), nitrogen oxides (NO_x), and toxic air pollutants (some of which are volatile organic compounds, or VOCs); diesel exhaust also contains these pollutants and others, including particulate matter (PM). Vehicle emissions are a function of the vehicle characteristics (size, type, fuel type, state of repair, etc), weather (temperature, wind, etc), and the vehicle's travel characteristics (how far the vehicle

⁷¹ These data were collected in the winter, when pedestrian counts may be lower. Additionally we note that low usage rates may not indicate low need, but may instead be a reflection of the quality or perceived safety of the current facilities.

⁷² See permitted air toxics map data available at <http://www.arcgis.com/home/item.html?id=f4cc50cb1fd44e6cb8f3a6535c666e7c>

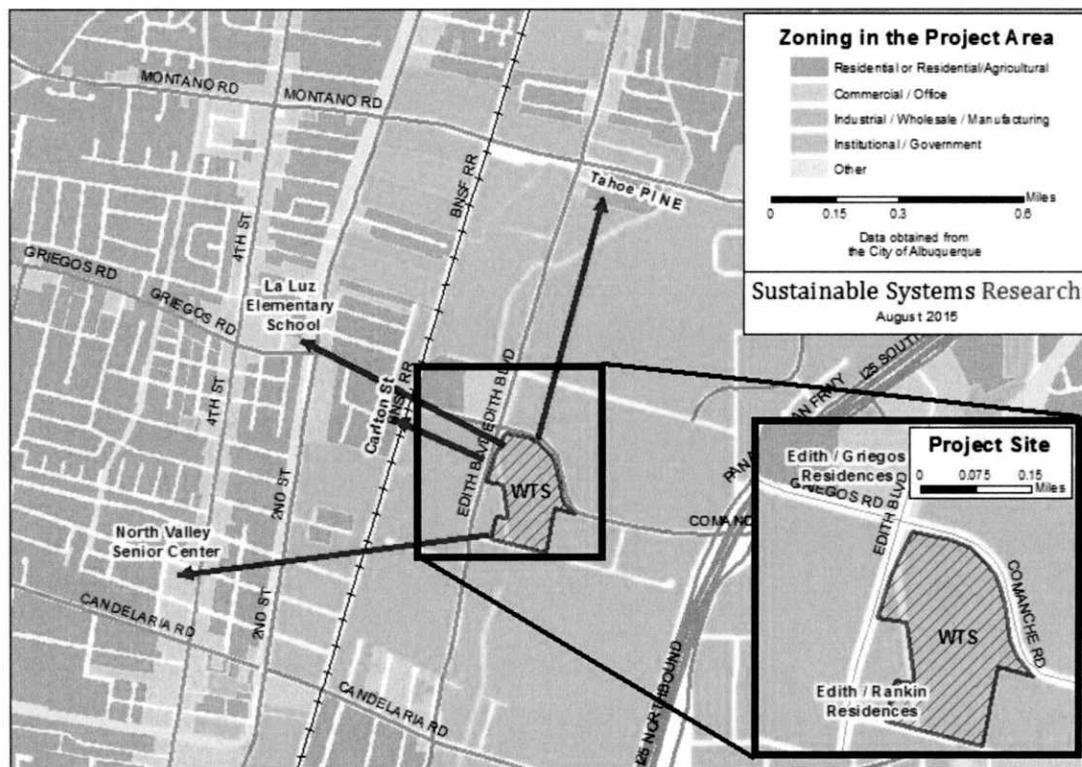


Figure 11: Area zoning and residences, elementary school, and senior center that are nearest to the proposed WTS. The inset map shows the approximate location of the Edith Blvd / Rankin Road residences (located in an industrial zone) and the Edith Blvd / Griegos Road residences (located in a commercial/office zone.)

travels, the speed and acceleration of the vehicle, the road grade, etc.) Ground level ozone is not emitted directly, but is formed secondarily when VOCs and NO_x combine in the presence of sunlight; ozone levels depend more heavily on regional (rather than very localized) emissions.

Exposure to these vehicle pollutants is associated with a number of adverse health outcomes:

- Nitrogen oxides (NO_x): Causes respiratory inflammation, increased symptoms in asthmatics [25].
- Carbon monoxide (CO): Reduces oxygen carrying capacity of the blood, leading to chest pain and myocardial ischemia in those with heart disease and even death at very high levels [26].
- Mobile Source Air Toxics (MSATs): Of particular health concern are benzene, 1,3-butadiene, formaldehyde, acrolein, acetaldehyde, polycyclic organic matter, and naphthalene. Human health effects studies are limited but evidence suggests that exposure to MSATs can increase cancer risks, respiratory irritation, and potentially lead to other health effects [27].
- Particulate matter (PM): Can lead to nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, irritation of airways, coughing, difficulty breathing, and premature death in people with preexisting health issues [28].
- Diesel exhaust (including diesel PM): In the short term can lead to acute irritation, neurophysiological symptoms, respiratory symptoms; in the long term it is associated with noncancer respiratory effects and elevated cancer risks [29].
- Ozone: Is formed at ground level when NO_x and VOCs combine in the presence of sunlight (is not emitted directly by vehicles). Ground level ozone causes respiratory inflammation and damage, aggravates existing respiratory conditions [30].

Bernalillo County is currently in attainment of all National Ambient Air Quality Standards (NAAQS). However, ground level ozone and coarse particulate matter (PM₁₀⁷³) levels in the area are very close to the standards. The PM₁₀ monitor that is nearest to the project site indicates that PM₁₀ values are just below current standards⁷⁴, while ground level ozone in Bernalillo County is just below current standards and exceeds proposed standards.⁷⁵

⁷³ PM₁₀ refers to particles that are less than 10 micrometers in diameter.

⁷⁴ The requirement to meet 24-hour PM₁₀ NAAQS is to exceed the standard of 150 µ/m³ no more than an average of once per year over a three year period (<http://www.epa.gov/airprog/oar/criteria.html>). The most recent design values for the Jefferson monitor (located about 1.9 miles away at 3700 Singer Blvd NE) show that it exceeded the PM₁₀ standard twice in the three year period from 2011 – 2013 (see PM₁₀ design values at <http://www.epa.gov/airtrends/values.html>). The most recent annual Jefferson monitor data indicates that there was nearly an exceedance in 2014, with a maximum observed value of 147 µ/m³ (see 2014 PM₁₀ annual measurements at http://www.epa.gov/airdata/ad_maps.html).

⁷⁵ Bernalillo County's most recent design value for 8-hour ozone is 0.072 ppm (see ozone design values at <http://www.epa.gov/airtrends/values.html>.) The current standard for 8-hour ozone is

Even in areas that are in attainment of these Federal standards, there can be health risks associated with air pollution. The health risks of air pollutants in a given area depend on local conditions. The National-Scale Air Toxics Assessments (NATA) provide coarse indications of health risks by census tracts based on roughly estimated air pollution levels.⁷⁶ These data should be interpreted with caution because they are too coarse to provide a clear indication of risks at the local level, although they can be useful for identifying areas that merit additional analysis. According to the 2005 NATA, the area around the proposed WTS may have elevated cancer and respiratory risks, largely due to vehicle emissions.⁷⁷

As detailed above, the proposed WTS is expected to increase vehicle travel in the project area. These activities have the potential to affect regional and local air pollution concentrations.

Regional Air Quality Impacts

There are several factors to consider when evaluating the project's impact on regional emissions. Emissions from collection truck trips will decrease as the distances that they travel decrease (collection trucks will travel shorter distances to the WTS rather than to the landfill). Emissions from vehicles dropping waste off at the convenience center will also likely decrease, as trips diverted to the convenience center will likely be those trips that are shorter when traveling to the WTS instead of the existing convenience centers. At the same time, emissions from transfer trucks will increase (where transfer truck trips will occur with the project but would not occur otherwise). Transfer trucks also emit more per mile than collection trucks⁷⁸. However we expect that the reduction in mileage of collection trucks will be substantial enough to outweigh the additional mileage and emissions rates of transfer trucks.⁷⁹ In other words, we expect that at the regional level, the project is likely to reduce overall transportation emissions.

0.075 ppm (<http://www.epa.gov/airprog/oar/criteria.html>). The proposed standard would be between 0.065 and 0.070 ppm (see

<http://www.epa.gov/airquality/ozonepollution/pdfs/20141125proposal.pdf>)

⁷⁶ See http://www.epa.gov/ttn/atw/nata2005/05pdf/nata2005_factsheet.pdf.

⁷⁷ Census Tract 003400, in which the WTS is located, is bounded on the east by the railroad tracks (from Candelaria Road to Montaña Road) and I-25 (from Candelaria Road to I-40), on the north by Montaña/Montgomery, on the west by Carlisle Blvd, and on the south by I-40 (from Carlisle Blvd to I-25) and by Candelaria Road (from I-25 to the railroad tracks). It has an estimated average total respiratory health index (HI) of 2.5 and a total cancer risk of 50 in a million. An HI of less than 1 indicates that adverse effects are unlikely. An HI greater than 1 may or may not indicate that adverse effects could occur – the HI is case specific. The respiratory index in Census Tract 003400 is driven primarily by onroad mobile sources (51%). The cancer risk is driven by onroad mobile sources and secondary formations.

⁷⁸ Based on EPA emissions estimates for 2008 heavy diesel trucks traveling in typical summer conditions (available at <http://www.epa.gov/otaq/consumer/420f08027.pdf>), we estimate that transfer trucks will emit more per mile than garbage trucks: 39% more CO, less than 1% more VOCs, 23% more NO_x, and 22% more PM per mile.

⁷⁹ This conclusion is based on a conservative estimate of the project's potential mileage savings. We estimate that in 2018 69 to 77 transfer truck trips will travel 36 miles to/from the landfill, for a total

Local Air Quality Impacts

Even if regional emissions decrease, emissions in the project area will increase as local trips increase. In areas around emissions sources, it is possible for local “hotspots” to occur. In these hotspots local pollution concentrations are greater than background levels (which are generally measured by local monitors). A number of studies have measured elevated levels of vehicle pollutants in close proximity to busy roads;⁸⁰ concentrations of most pollutants drop off between 115 and 570 meters, or 377 to 1870 feet [33]. These distances would vary depending on local weather patterns, traffic volumes, etc.

The local impacts of the proposed WTS will depend on the magnitude, location, and timing of vehicle emissions, which drive the concentrations to which people are exposed. The emissions will be greatest along corridors with the greatest number of new trips (particularly truck trips) and for corridors that are already congested or that will become more congested with project trips. The potential health impacts of these emissions is driven by the concentrations to which people are exposed, which will be a function of local environmental conditions and the location of people relative to emissions.

The proposed WTS site is approximately 100 to 200 feet from the nearest residences (approximately six homes at the corner of Edith Blvd and Rankin Road). Under Design Plan C these residences are approximately 600 to 800 feet from the proposed Edith Blvd entrance (which will carry some collection trucks and all transfer trucks) and approximately 350 to 500 feet from the proposed western Rankin Road entrance (which will carry some driver/maintenance employee vehicles). Under Design Plan D these residences are approximately 150 to 250 feet from the proposed western Rankin Road entrance (which will carry all collection trucks and transfer trucks).

of additional 2484 to 2772 miles each weekday if the project is built. There are currently 268 collection truck trips to the landfill each weekday (City Data Table); growing these by 1.5% yields an estimated 284 trips in 2018 (these are trips to the landfill that would occur if the project isn't built). Assuming that each collection truck saves 16 miles by traveling to/from the WTS rather than the landfill yields an estimated 4551 miles saved each weekday if the project is built. This mileage estimate is 64% to 83% greater than the transfer truck mileage estimate; the overall mileage difference of at least 64% to 83% likely outweighs the 0% to 39% greater emissions per mile from transfer trucks. The calculation is conservatively low for three reasons: 1) the collection truck mileage savings estimate is based on a collection truck entering I-40 at Coors Blvd NW although most trucks will enter the highway farther east, 2) the collection truck mileage estimate omits the mileage saved from the last trip of the day to park the collection truck at the WTS, and 3) the estimate does not account for regional project emissions savings from the change in mileage for convenience center drop-offs.

⁸⁰ A number of the studies reviewed did not specify the traffic levels on the busy roads evaluated. Dispersion modeling of Los Angeles indicates that PM_{2.5} is somewhat elevated near roads with 25,000 – 50,000 annual average daily traffic [31]. Health effects have been observed at traffic levels as low as 10,000 trips/day [32, Chapter 3, Appendix B]. For reference, daily traffic levels along affected arterials in the project area range from 10,756 to 26,737 (see Table 4).

There are also residences at a distance of 600 to 700 feet (northwest of the intersection of Griegos Road and Edith Blvd) and at 1,300 feet (or about 400 meters, along Carlton Street), a school at a distance of 2,700 feet (La Luz Elementary School), and a senior center at a distance of 4,200 feet (North Valley Senior Center). Figure 11 highlights these locations and zoning in the area (which indicates additional residential areas along potentially affected corridors.)

As described above, the majority of project traffic (including new truck trips) will occur along Comanche Road between Edith Blvd and I-25, on I-25, at the I-25 / Comanche interchange, and on Edith Blvd adjacent to the proposed site (under Design C); Comanche Road, Edith Blvd, and the I-25 interchange is also where project trips may contribute the most to congestion. Additionally, vehicles may idle at the site as they queue for drop-offs; vehicle idling would also result in emissions from the site itself. Air pollution levels in the project vicinity may increase modestly as a result of these trips and on-site idling; it is possible for pollution from the site and Comanche Road/Edith Blvd traffic to cause elevated concentrations as far as the nearest residences⁸¹, although the magnitude of these impacts is unknown.

Other corridors of interest are those that carry new traffic and are adjacent to nearby homes and La Luz Elementary School: Rankin Road adjacent to the site (under Design Plan D), Griegos Road west of 2nd Street, Montañó Road west of 2nd Street, Montañó Road just east of Edith Blvd, and 2nd Street from Candelaria Road to north of Montañó Road (see zoning in Figure 11). Traffic increases along Griegos Road, Montañó Road, and 2nd Street are more modest than increases that will occur adjacent to the project site and along Comanche Road at I-25.

Pollution dispersion modeling that accounts for local conditions and the project's emissions generating activities would be necessary to determine the proposed WTS impact on pollution concentrations experienced by nearby residents.

Overall, we find that the change in vehicle travel associated with the project is likely to lead to reduced regional emissions levels and to increased emissions levels in the area around the project. This increase in local emissions may result in slight increases in pollution levels to which residents are exposed, although the magnitude of these impacts is unknown.

Note that this analysis does not include the potential for pollution due to the stationary equipment used on-site; these activities may result in additional

⁸¹ The nearest residences are located approximately 100 to 200 feet (30 to 61 meters) to the southwest of the proposed site northeast of the intersection of Edith Blvd and Rankin Road. These Edith Blvd & Rankin Road residences and those located northwest of Griegos Road & Edith Blvd and along Carlton Street are within range of near-road pollution for busy roads [33]. Wind direction in the region varies, although in the winter it often blows from the north (based on National Oceanic and Atmospheric Administration. Albuquerque International Airport Wind Rose Plots: 1985 -2005. From <http://www.srh.noaa.gov/images/abq/WindRosePlots/ABQ8505ann.pdf>)

emissions at the site. Additionally, if the proposed facility does not accommodate drop-offs on-site and queuing vehicles are backed up onto surface streets, the on-site idling and congestion impacts (and therefore the pollution impacts) would be greater.

Noise Impacts

Excessive noise can increase stress, blood pressure, contribute to hearing loss, and lead to sleep loss [34]. Noise occurs along roads, as a function of vehicle volume and speeds, vehicle characteristics, pavement characteristics, the characteristics of the area adjacent to roads (e.g. presence of trees or barriers).

Trucks generally cause more road noise than passenger vehicles [35]. Most of the new truck trips that will result from the proposed WTS will travel along Comanche Road from Edith Blvd to the I-25 interchange, on I-25 south of Comanche Road, on Edith Blvd adjacent to the project site (under Design Plan C), and on Rankin Road adjacent to the project site (under Design Plan D) although some new collection truck trips will travel along other road segments (including Griegos Road west of Edith Blvd, Comanche Road east of I-25, Montaña Road, 2nd Street, and 4th Street, see Table 5).

The worst noise impacts generally occur when truck volumes and speeds are greatest, generally when traffic is free flowing (with a Level of Service "C") [35]. New truck trips will occur between the hours of 7:30 am and 6 pm, with the greatest number of truck trips occurring in the morning⁸². The impacted corridors exhibit a range of congestion conditions during the afternoon peak period (see Figure 1.) We expect that the greatest noise impacts of the proposed WTS will occur at different times along each corridor. For example, corridors that exhibit congested conditions during peak periods and carry a number of collection trucks (which travel in the mid-morning) may exhibit the worst noise impacts between the morning and mid-day peak period when speeds are high. For corridors that do not exhibit congestion and that carry a number of transfer trucks (which travel from 8:30 am to 4pm) and collection trucks, the worst noise impacts may occur from morning to mid-day, when most trucks are traveling.

The impacts of the proposed WTS will depend on the additional noise experienced by nearby residents. While the noise impacts of a road depend on the specific conditions of the traffic, the road, and its surroundings, FHWA indicates that in general "...highway traffic noise is not usually a serious problem for people who live more than 500 feet from heavily traveled freeways or more than 100 to 200 feet from lightly traveled roads." [36].

For the proposed WTS, the corridors of greatest concern are those that carry new project truck traffic and are located near homes and La Luz Elementary School:

⁸² See the timing shown in the City Slide [4].

Edith Blvd just north of the Griegos Road, Rankin Road adjacent to the site (under Design Plan D), Griegos Road just west of Edith Blvd and west of 2nd Street, Montaña Road between 2nd Street and 4th Street, Montaña Road and Edith Blvd, and 2nd Street from Candelaria Road to north of Montaña Road (see Figure 11). Note that several of these corridors are expected to carry collection trucks only (transfer trucks will travel to the Comanche Road entrance to I-25, via Edith Blvd under Design Plan C or Rankin Road under Design Plan D).

Of these locations, the homes southwest of the project site (at the northeast corner of Edith Blvd and Rankin Road) are in proximity to the greatest weekday volume of truck traffic that occurs near residences, particularly under Design Plan D. We estimate that 329 to 372 new one-way truck trips will occur on weekdays at the Edith Blvd access point (located approximately 600 to 800 feet away from these homes) under Design Plan C and 445 to 489 new one-way truck trips will occur on weekdays at the Rankin Road access point (located approximately 150 to 250 feet away from these homes) under Design Plan D. These new trips will be a mix of collection and transfer trucks. Assuming that these trips are evenly distributed during the hours of travel indicated in the City Slide, we estimate that the greatest rate of truck trips will occur from 9:30 am to 10:30 am, when there will be approximately one truck every 41 seconds under Design Plan C and one truck every 27 seconds under Design Plan D.

Additionally, one home northwest of Edith Blvd & Griegos Road (on Edith Blvd), the homes southeast of Edith Blvd and Montaña Road (on Tahoe Place NE), and the homes west of 2nd Street north of Montaña Road are also in proximity to modest levels of weekday truck traffic (see Table 5.) We estimate that 28 to 46, 24 to 46 and 24 to 42 new one-way truck trips will occur along these corridors on Fridays⁸³ respectively; these additional truck trips will be a mix of residential and commercial collection trucks that will travel from 7:45 am to 1 pm. Assuming that these trips are evenly distributed during the hours of travel indicated in the City Slide, we estimate that the greatest rate of truck trips will occur from 9:30 am to 10:30 am, when there will be approximately one truck every five to six minutes at these locations⁸⁴.

⁸³ Residential trip route shares vary by weekday; our estimates are based on the maximum share of any weekday.

⁸⁴ This estimate is based on the trip rate and route assumptions outlined earlier, which indicate that new collection truck trips in 2014 are as follows: 70 to 83 new commercial roll-off round trips, 34 new commercial front- and rear-load round trips, and 50 new residential collection round trips. In 2018 this equates to 74 to 88, 36, and 53 round trips respectively (assuming a 1.5% annual growth rate, consistent with the Design Memorandum [1]). From 9:30 am to 10:30 am, we estimate that 19%, 50%, and 50% of these trips occur, respectively (assuming that these trips are evenly distributed from 7:45 am to 1 pm, 8:30 am to 10:30 am, and 9:30 am to 11:30 am, respectively based on the City Slide.) We estimate that 8 to 10%, 8 to 10%, and 11 to 21% of trips will occur along Edith Blvd & Montaña Road on weekdays and 6 to 8%, 6 to 8%, and 11 to 21% of trips will occur along 2nd Street north of Montaña Road (reflecting the residential collection truck trip rate on Fridays, which is the highest of the weekdays). Round trips are converted to one-way trips to yield the estimates shown in the text.

Conclusions:

Based on the information that is currently available, it does not seem possible to verify the full extent of the traffic impacts of the proposed Waste Transfer Station that have been reported by the City. Estimates of expected new project trips vary depending on the source of the information, and many of the estimates that are available are not transparent in the reasoning behind their assumptions or conflict with other reported findings.

It is difficult to draw conclusions about the project's impacts without clear, transparent and consistent information. In addition, residents' concerns about air quality, bike and pedestrian accommodation, noise, and safety were not addressed in the Draft Traffic Study.

The primary purpose of this analysis was to distill the available information into reasonable and transparent estimates of new project trips. With these estimates, the potential impacts of the project can be re-examined (in the case of vehicle traffic impacts) or investigated more closely (in the case of air quality, noise, safety, and bicycle and pedestrian accommodation impacts). Due to limited time and resources our analysis of impacts has drawn largely from available data and resources. We have also clearly laid out the rationale behind our assumptions where necessary.

Based on our analysis, we find that the transportation impacts of the WTS project are likely to be greater than represented in the Draft Traffic Study. We recommend that the differences and inconsistencies we have identified in this report be evaluated more thoroughly to determine whether impacts will be significant. Significant impacts may indicate the need for design changes or mitigation alternatives. We note that this analysis was limited in two respects: the transportation analysis was conducted using available data and information, and concerns about odors, pests, water quality, etc were not addressed here.

It is our hope that as the decision making process moves forward, residents' concerns will be adequately addressed (many may already be being addressed in the Final Traffic Study currently underway). We have provided a number of specific recommendations for improving the project's traffic analysis –in terms of the assumptions used, the transparency of the analysis, and of the impacts evaluated and addressed. Below we summarize our findings in more detail and we present recommendations for improving the traffic analysis of this project. We close with a discussion about the limitations of this analysis.

Findings:

Trip Estimates:

- Based on the available data, we estimate that the project will result in 390 to 732 new trips per weekday and 528 to 680 new trips per weekend day. Of these, 232 to 254 trips per weekday and 33 to 43 trips per weekend day will

be truck trips. The ranges presented here exceed trip estimates calculated by summing the City's trips estimates.

- A number of additional new trips are expected to occur during peak traffic periods in the area, including collection truck trips (in contrast to what was indicated in the Draft Traffic Study).
- A number of collection truck and convenience center trips will likely access the site via intersections that have not been considered in the Draft Traffic Study.
- Recycling center trips, hazardous waste, and re-use drop-off trips have not been accounted for in the Draft Traffic Study or in this report.

Traffic Impacts:

The impact of the project on intersection delay was not quantified in this report. Based on the trip estimates above we highlight the areas with greater potential for traffic impacts:

- The greatest changes in traffic volumes will occur along Comanche Road, I-25, the I-25 interchange, and Edith Blvd adjacent to the site (under Design Plan C) although there will also be smaller increases in traffic volumes along other routes in the project area. The greatest percent change in traffic volumes will occur along Comanche Road (between Edith Blvd and I-25), at the I-25 interchange, and on Edith Blvd adjacent to the site (under Design C), where traffic will increase by up to 3 to 7% over 2018 traffic levels.
- Comanche Road and I-25 (and Edith Blvd adjacent to the project site under Design C) are the primary routes that will be used by collection and transfer trucks, although a number of other roads in the area will also carry new truck trips. We estimate that the number of trucks using Comanche Road between Edith Blvd and the I-25 interchange will increase by approximately 47% to 151% on weekdays.
- The greatest weekday afternoon peak traffic impacts are expected on Comanche Road, with estimated traffic volume increases of up to 6% during the afternoon peak period. Additionally, a number of other roadway segments in the project area that currently exhibit congestion will likely experience modest traffic increases during the afternoon peak period.

Safety Impacts:

The overall magnitude of the project's impacts on safety was not quantified in this report. Given that greater traffic volumes, speeds, and truck shares can adversely impact safety there is elevated concern about safety along the following corridors:

- Comanche Road between Edith Blvd and I-25, I-25, the I-25 interchange, and Edith Blvd adjacent to the site (under Design Plan C) will carry the majority of project traffic (including truck traffic). Truck traffic on Comanche Road and Edith Blvd is of particular concern in light of the bike facilities on Comanche Road and Edith Blvd.
- The addition of project trips at the intersections of Montaña Road & 4th Street and Montaña Road & Edith Blvd may be of concern in light of the safety risks that are already present.



Sysco Corporation
1390 Enclave Parkway
Houston, TX 77077

sysco.com

December 16, 2016

Savina G. Garcia, PE
WILSON & COMPANY INC. (agents for the City of Albuquerque, Edith Waste Transfer Station Project)
4900 Lang Ave. NE
Albuquerque, NM 87109

Dear Ms. Garcia:

On behalf of Sysco New Mexico, I am writing to request a deferral of the Environmental Planning Commission scheduled for next month.

We recently learned the City of Albuquerque has applied for a zone map amendment change for the Edith and Comanche solid waste transfer station site. We are aware surrounding businesses were notified of this application, but we received no such notification. Further, we learned from a business neighbor that a proposed meeting between the City and interested parties has been discussed; however, we are getting this information second-hand, were not notified, and have no information regarding this meeting.

Sysco New Mexico submitted a letter to the Albuquerque City Council's hearing on October 17, 2016 to support the appeal of the June 10th declaratory ruling for the transfer station, issued by the Code Compliance Official (AC-16-9). Considering the size and economic impact of Sysco New Mexico, in addition to our close geographic proximity to the site—our southwest boundary is less than 100 feet from the proposed location—we have a considerable financial interest in this matter, and thus we believe we have standing.

In light of these developments, Sysco will need adequate time to obtain all relevant documents, review such documents, and submit comments and evidence. Since we were never notified of this zone change application and are heading into the holiday season, we have insufficient time to conduct a thorough analysis and prepare a thoughtful response for a January 12th hearing.

For these reasons, we respectfully request that the Environmental Planning Commission hearing scheduled for January 12th be deferred until a future hearing date, but not sooner than February 2017.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gerald R. Kunde, II". The signature is fluid and cursive, with a prominent initial "G" and "K".

Gerald R. Kunde, II
Vice President of Government Relations

cc: John Soladay, Director, City of Albuquerque Solid Waste Management Department
Jill Holbert, Deputy Director, City of Albuquerque Solid Waste Management Department

Bike/Pedestrian/Transit Accommodation Impacts:

The overall magnitude of the project's impacts on non-auto traveler accommodation was not quantified in this report. A number of the roads in the area are critical routes for bicycles, pedestrians, and transit users, and many of the roads are currently in need of improvement and/or have planned improvements for better accommodating non-auto travelers. In light of the increased traffic volumes (particularly truck volumes), the project's new trips may adversely impact the accommodation of non-auto modes. Corridors that are of particular concern include:

- Comanche Road, which has a bike lane and a bus line, and which will carry the greatest number of new trips (including truck trips) of the arterials in the project area.
- 2nd Street, which has two bus lines and a bike route where cyclists share the road with vehicles.
- Edith Blvd, which has a bike route where cyclists share the road with vehicles, particularly under Design Plan C when it will carry a majority of new truck trips.
- Griegos Road, which has a bus line and a bike lane with a gap directly in front of a school.
- 4th Street, which has a bus line and which is planned for improved non-auto accommodation under the 4th Street Corridor Plan.
- Montaña Road, which has a bus line, a Transit Center, and a bike lane with a gap.

Air Quality Impacts:

We find that the change in vehicle travel associated with the project is likely to lead to reduced regional emissions levels and to increased emissions levels in the area around the project. This increase in local emissions may result in slight increases in pollution levels to which residents are exposed, although the magnitude of these impacts was not quantified in this report. Areas of elevated concern include:

- Residences at the northeast corner of Edith Blvd and Rankin Road, approximately 100 to 200 feet from the project site. These residences are the closest to the project site itself and to the most heavily impacted corridors, which are Comanche Road between Edith Blvd and I-25, Edith Blvd adjacent to the site (under Design Plan C), Rankin Road (under Design Plan D), and the I-25 interchange.
- Residences located northwest of Edith Blvd & Griegos Road, along Carlton Street, and near Carlton Street. These residences are also near the project site and the most heavily impacted corridors, although they are not as close as the homes at Edith Blvd and Rankin Road.
- Additional corridors of concern include Griegos Road west of 2nd Street, Montaña Road west of 2nd Street, Montaña Road just east of Edith Blvd, and 2nd Street from Candelaria Road to north of Montaña Road. Traffic increases along these corridors are more modest than along Edith Blvd, Rankin Road, Comanche Road and I-25, but potentially affected residents are located relatively close to these roads.

Noise Impacts:

The overall magnitude of the project's impacts on noise was not quantified in this report. Given that high vehicle speeds and high volumes of truck traffic can increase noise, the corridors of greatest concern are those that carry new project truck traffic and are close to nearby homes and La Luz Elementary School. These include:

- Edith Blvd just north of the Griegos Road, Rankin Road adjacent to the site (under Design Plan D), Griegos Road just west of Edith Blvd and west of 2nd Street, Montaña Road between 2nd Street and 4th Street, Montaña Road and Edith Blvd, and 2nd Street from Candelaria Road to north of Montaña Road.
- The homes at the northeast corner of Edith Blvd and Rankin Road are in proximity to the greatest weekday volume of truck traffic that will occur near residents. During the busiest hour at this location, nearby access points are expected to carry approximately one truck every 41 seconds (under Design Plan C, 600 to 800 feet from residences) and one truck every 26 seconds (under Design Plan D, 150 to 250 feet from residences).
- The homes on Edith Blvd just north of Griegos Road, near Montaña Road and Edith Blvd (on Tahoe Place NE), and on 2nd Street north of Montaña Road are also in proximity to weekday truck traffic. During the busiest hour at these locations, these corridors are expected to carry approximately one truck every five to six minutes.

Recommendations:

In light of the community's concerns about the traffic impacts of the project, we recommend a number of general principles for an improved evaluation of traffic impacts:

- The assumptions used in the traffic analysis should be more clearly explained and justified.
- Where data are unavailable, assumptions should be conservative (tending to estimate worst case traffic impacts) or better data should be collected to improve estimates and help justify explanations.
- Trip estimates should account for growth in waste collection and drop-off activities that are expected to occur between the present and 2018.

We also provide a number of specific recommendations for an improved traffic analysis:

Trip rates:

- The rate of diversion from the three convenience centers should be explained or evaluated in more detail. If there is a possibility that the convenience centers will be closed, the traffic evaluation should assume full diversion of convenience center drop-offs to the WTS.
- The visitation rates at the three convenience centers should be explained or evaluated in more detail. Similarly, the timing of convenience center trips should be determined using visitation data, or these visits should be conservatively assumed to coincide with peak traffic in the area.

- Visits to the recycling, hazardous waste, and re-use facilities should be quantified and included in the traffic assessment.
- Transfer truck trip estimates should account for convenience center waste in addition to collection truck waste.
- The transfer truck capacities should be explained or a conservative assumption should be used.

Trip timing:

- Collection truck trips should be evaluated, as a number of these trips are expected to occur during peak travel periods in the project area.

Trip routes:

- Assumptions about collection truck trip routes and convenience center trip routes should be explained or evaluated in more detail.

Traffic evaluation:

- Traffic should be evaluated for each hour in the peak period (6:30 – 9:30 am, 11 am – 1:30 pm, and 3:00 – 6:30pm) in order to determine the worst impacts expected from project.
- Traffic data collected at Comanche Road and I-25 Pan American Freeway Southbound does not include data from 11 am to 12:30 pm; this omission should be explained or rectified.
- Potentially impacted intersections along Montaña Rd should be evaluated.
- The impact of the change in entry/exit of existing truck trips that will occur with changing access under each design alternative should be evaluated.
- Weekend traffic impacts should be evaluated in light of the proportion of convenience center traffic that is expected to occur on the weekend.

Evaluation of impacts:

We strongly recommend revisiting the evaluation of the impact of additional project vehicle trips on non-auto modes. Additionally, there is potential for safety, air quality, and noise impacts from new project trips and site activities, particularly at the residences located very close to the project site (northeast of Edith Blvd and Rankin Road). A more detailed evaluation of those impacts may address residents' concerns by characterizing impacts and determining design alterations or mitigations as appropriate.

Limitations of this Study:

The primary limitation of this study was that it had a very limited scope. We relied on reasonably available data and information for our assessment of impacts. Additional analysis is required to fully evaluate the effects of potential additional trips at various locations, which would (in some cases) require collection of new data. We also did not consider non-transportation impacts of the project (e.g. odors, pests, water quality, etc.)

Additionally, we note the following specific limitations of this analysis:

- Because there is no “one-size fits all” answer to the question of the design of waste transfer facilities and its impacts, it is necessary to rely on the data provided to the public. Therefore, our estimates are presented as ranges because they rely on uncertain and varying assumptions gleaned from existing WTS documents.
- A number of assumptions adopted by this analysis are difficult to confirm and if they are incorrect the estimates in this report would need to be revised. For example:
 - if collection trucks make more trips to the landfill and/or if there are fewer trucks or routes than what was presented in the City Data Table
 - if some collection or transfer trucks will be stored off-site,
 - if transfer truck capacities are smaller or larger than assumed,
 - if any of the three existing convenience centers close,
 - if there is a change in the number of employees commuting to the site with the project (e.g. gatehouse personnel, etc)
 - etc.
- We have evaluated the number of trips expected in 2018; this time period is consistent with the evaluation in the Draft Traffic Study. We have not evaluated the trips expected for the project lifetime (e.g. through 2034) as was done in the Design Memorandum. Trips are assumed to increase at a rate of 1.5% per year in the Design Memorandum.
- We have evaluated expected typical trips (rather than peak trips). The Design Memorandum uses estimates of peak trips in order to determine the maximum capacity needed at the WTS.
- We have not evaluated the impacts of the proposed on-site activities, or the site design. Specifically, our analysis does not account for:
 - Safety impacts of any changes in the roadway at access points
 - Safety, air quality, noise, or bike/pedestrian accommodation impacts of any traffic that may spill onto adjacent arterials if the site cannot accommodate peak drop-off queues.
 - Safety, air quality, or noise impacts of on-site activities.

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Appendix A: Estimated Trip Routes

Residential Collection Truck Trips: Weekday Routes

Route shares are estimated visually based on proposed route maps presented by the City of Albuquerque and may have some error. Routes are traced through the five Draft Traffic Study intersections and along Montano (where a number of routes travel). Values shown are the maximum for a weekday. The weekday is indicated in parentheses.

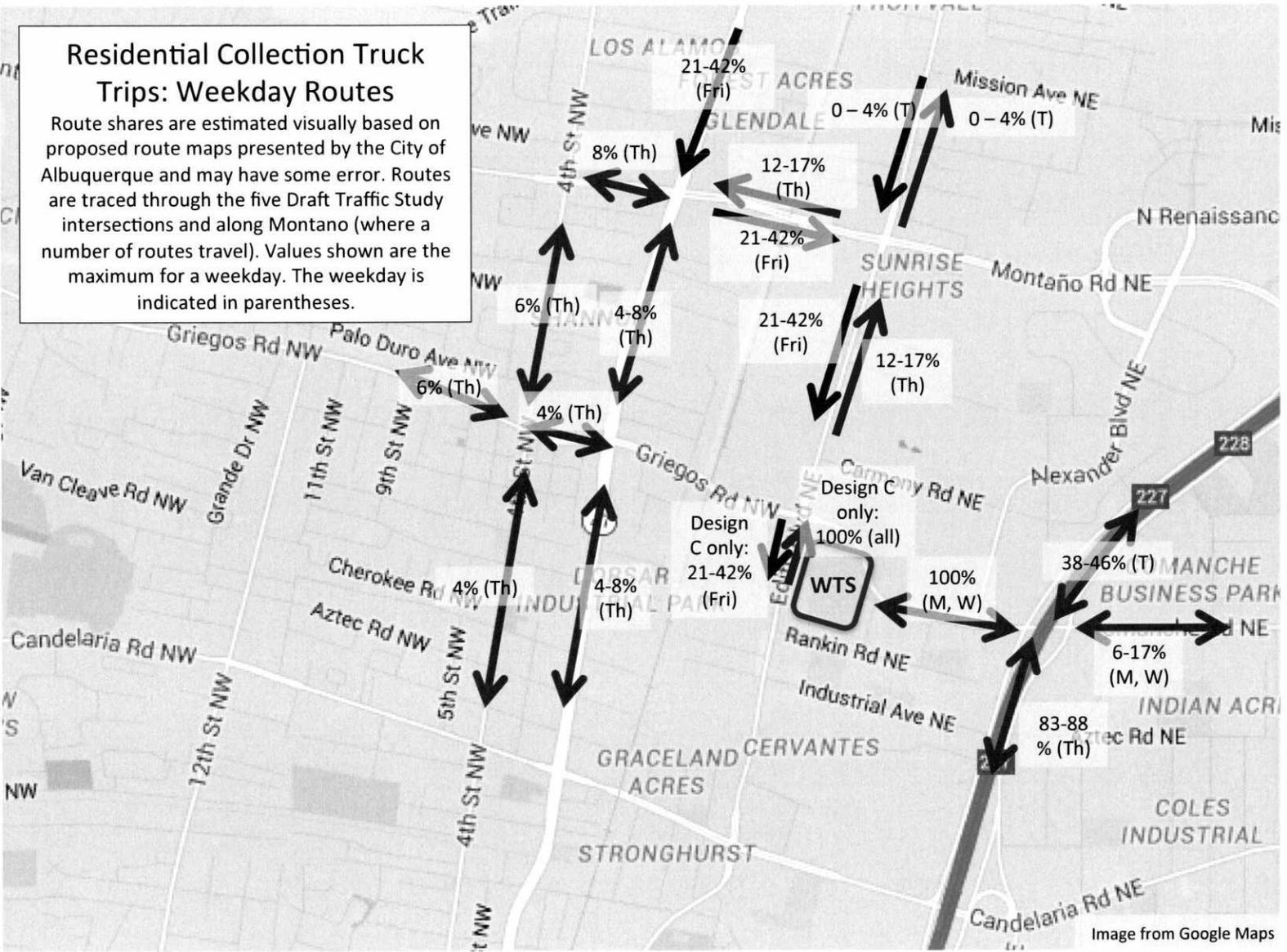


Image from Google Maps

Commercial Collection Truck Trips: Weekday Routes

Route shares are estimated visually based on proposed route maps for front load regular commercial trips presented by the City of Albuquerque and may have some error. Routes are traced through the five Draft Traffic Study intersections and along Montano (where a number of routes travel).



Image from Google Maps

