9-24-15
#1010582

Mr Nicholls, Chair EPC

I have read the application, Resolution 270-198, policies and goals and all the printouts given by the city at meetings. I have worked on the North Valley Health Impact Assessment since last November.

Resolution 270-1980(A) The proposed zone change may be found to be consistent with the health, safety, morals and general welfare of 3/4's of the city but not for the close businesses and residents or the North Valley.

Policy 11.B.5d: The location does not respect the existing neighborhood values, natural enviromental conditions or the carring capacities. The city is not concerned about its neighbors or the traffic it will generate.

Policy 11.B.5i: The noise and pollution will drift down on us and into the valley; especially in winter. Refer. to the NVHIA.

Policy 11.B.5K: None of the residents of 7 homes in the NE corner of Edith and Rankin knew of these plans. The employees of WTS will use Rankin to get to parking and garbage trucks will have the parking lot 92 feet from them.

Policy 11.C.1e: Motor vehicles emissions and their adverse effect will be minimized for the city but not for the area of the WTS. ... us ... the valley.

Policy 11.C.1g: Pollution from particulates shall be minimized. See HIS. Pollution can not be avoided in close in area.

Policy 11.C.1h: During air stagnation episodes the garbage will be collected and hauled away as usual. There are no plans to stop collection at these times.

Policy 11.C.1K: The citizens who work closest to the WTS will not be protected from toxic air emissions. However the employees will probably wear protective suits, gloves and masks.

Policy 11.C.2a: We asked if water would be monitered and were told no. . no need. See HIS

Policy 11.C.2c: Water contamination resulting from solid waste disposal shall be minimized. The plan is to be scrubbed nightly, but concrete floors crack, splash etc. How is this to be handled?

Policy 11.C.3b: No plan has been mentioned to convert waste to energy. Which should be what we are doing instead of transferring it to the landfill. There is no green waste collection and we either.

Policy 11.C.3c: Illegal dumping in the immediate area to the WTS and CS will not be minimized. When the center is closed the people will dump all over the area rather than haul it back home. The recycle areas are dumps of everything.. toilets, mattresses, paint, oil-any and everything.

Policy 11.C.3f: I fear how household hazardous waste will be handled. We have watched and taken pictures of the recycle center and side our door and the way it was mishandled.

Policy 11.C.4b: How can noise not effect business close to the WTC. Are we not neighbors? Neighbors who work, pay taxes and will be greatly effected by the noise of trucks, doors, backup safety signals all day long. The truck park closer than 1300 feet from their neighbors on Rankin and Edith.

Policy 11:D The plan began in 2006. Who knew? They want to provide a sustainable method for solid waste collection and transport. The new "state of the art", energy efficient, aesthetically pleasing facility seems none of the above. It is to transfer garbage to a landfill. It is not collecting, composting green waste. Turning waste to energy. It seems to be as the city says.. very beautiful but old school and obsolete.

Policy 11.D.4a: Peak hour traffic in this area is

North Valley Area Plan - Goals and issues:

1. The proposed zone change does not recognize the North Valley as a unique and fragile resource or as an inestimable and irreplaceable part of the entire metropolitan community. See the HIA The North Valley should not take in what the entire city dumps.

Air Quality - see HIA

Drainage - see HIA

Transportation: The city and county should encourage the smooth flow of traffic on arterials.

The traffic will be congested and dangerous on Comanche, on ramp to I 25, the Big I, returning from Big I to frontage road and Comanche. There is a huge amount of trucks already. They have to have 2 lanes to turn. There is a short distance between the lights on the 2 frontage roads under the I 25. The railroad crossing below Edith sometimes ties up AM & PM traffic clear to I 25. There is no way to encourage a smooth flow of traffic in this area. This is not a good location for WTS.

The WTS is out dated garbage disposible. We should on the West side of town where the future growth is located be building an Energy from waste, state of the art facility.

I oppose the zone change.

Marian Tavione
4404 Edith NE
4013 Julane NE
Alb. NM 87107

Quevedo, Vicente M.

From: =David Wood CPA= <wood_cpa@msn.com>
Sent: Monday, September 28, 2015 9:53 AM
To: Quevedo, Vicente M.
Cc: G.G.N.A. BOARD
Subject: Document submission #1
Attachments: 1990 Zone Decision001.pdf

Importance: High

Good morning Mr. Quevedo,

Please accept the attached document as evidence for the Commissions consideration.

This is 1 or 3 submissions we will make before 5 pm today.

Thank you for your distribution of this document.

Respectively,

David Wood
GREATER GARDNER NEIGHBORHOOD ASSOCIATION

David Wood, C.P.A.

(505) 221-2626
Email: Wood_CPA@msn.com

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Greater Gardner Neighborhood Association

A North Valley Association of Concerned Albuquerque Residents

September 28, 2015

Mr. Peter D. Nicholls, Chair
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

=Transmitted Electronically=

RE: ZONE MAP AMENDMENT: Proposed Edith Transfer Station
EPC Project # 1010582

Commissioner Nicholls:

Our Neighborhood Association respectively submits a 1990 Bernalillo County Planning Commission notification of their decision for a *Special Use Permit for a Solid Waste Transfer* station, *on a portion of the same parcels* that the applicant is now requesting the same zone change for in 2015.

While we fully recognize that this was a County zoning decision, prior to that same property being annexed by the City in 2002. We believe this is relevant to the current zone map amendment request for the following reasons:

1. **This decision sets *precedence*, in that a Transfer Station has *previously been* <u>*proposed and rejected*</u> on a portion of the current site.**

2. **The findings that, *"This requested use is incompatible with the surrounding land uses"*, is in our judgement, more valid today, than back in 1990, and not in conflict with R270-1980.**

3. **The second finding, *"This location is near to several food manufactures (SYSCO), and pests will be a problem"*, is still relevant to this requested zone map amendment.**

Thank you for your consideration of this document.

Sincerely,

Greater Gardner Neighborhood Association

David Wood President

OFFICIAL NOTICE

NOTIFICATION OF DECISION

DATE: APRIL 6, 1990

LOCATION: Tract 108-A-3-B, Tract 108-A-1-A-2-B-1, and Tract 108-A-1-A-2-B-2, Middle Rio Grande Conservancy District Map Number 33 zoned M-1, located on the north side of Rankin Road, NE, south of Griegos Road, NE, and east of Edith Boulevard, NE, containing 5 acres (C-15-Z).

T. Brown Constructors, Inc.
P. O. Box 26508
Albuquerque, NM 87125

FILE: CSU-90-20

DECISION AND CONDITIONS

At the April 4, 1990 public hearing the Bernalillo County Planning Commission Denied your request for a Special Use Permit for a Solid Waste Transfer station, based on the following Findings.

FINDINGS:

1. The requested use is incompatible with surrounding land uses.

2. This location is near to several food manufacturers and pests will be a problem.

If you wish to appeal this decision, you must so do by APRIL 19, 1990 in the manner described below. A filing fee of $40.00 is required for properties consisting of one (1) acre or less, and $60.00 is required for all others.

APPEALS: Appeal of any denial or approval of an application by the Bernalillo County Planning Commission may be submitted in writing to the office of the Zoning Director within 15 days after the date of determination by the Bernalillo County Planning Commission. The date the determination in question is issued shall not be included in the 15-day period for filing an appeal, and if the fifteenth day falls on a Saturday, Sunday or holiday, the next working day shall be considered as the deadline for filing the appeal.

A building permit or Certificate of Occupancy & Compliance shall not be issued until any appeal is decided, or the time for filing such appeal has expired. If a written protest is signed by the owners of 20% or more of either the area of the lots and lands included in such proposed change or of those immediately adjacent within 100 feet of the area proposed for change, disregarding public ways, such change to the Zone Map shall require the majority vote of the members of the Board of County Commissioners.

WRITTEN NOTICE OF APPEAL SHALL BE FILED WITH THE ZONING DIRECTOR ON THE PRESCRIBED FORM ALONG WITH PAYMENT OF THE REQUIRED FILING FEE.

Susan F. Connors
Susan F. Connors, Senior Planner

SFC:mes:11239

cc: File
County Manager
County Zoning Director
Bolesio Romero, County Public Works Department
Ted F. Brown, PO Box 26508; 87125
W. J. Hall, 3424 Vasser, NE; 87106
Mike Kauffman, 601 Comanche Rd., NE; 87107
Guy Conway, 567-C Comanche, NE; 87107
Ed Tinsley, 800 Rankin Road, NE; 87107

September 28, 2015

Mr. Peter D. Nicholls, Chair
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

=Transmitted Electronically=

RE: ZONE MAP AMENDMENT: Proposed Edith Transfer Station EPC Project # 1010582

Commissioner Nicholls:

I was one of the members of the **Citizen Design Advisory Task Force** team. We were invited by the City of Albuquerque to join them in developing a "wonderful project" for the proposed Edith Transfer & Convenience centers. The City and its Consultant team developed this working group to meet with concerned citizens. The community appointed four people initially to meet with the City and its team, then a couple more people joined in occasionally for a few of the meetings. This group came to be known as the "DATF" – Design Advisory Task Force.

Our purpose for accepting was our belief that we would bring neighborhood and community input to the design table, in a good faith effort to mitigate some of the community concerns identified.
What we ended up, was a feeling of being used by the City to claim public involvement in their process.

The process was not entirely smooth or transparent.
On one occasion early on, the citizen group asked for a topographic survey which the City was using to study and develop alternatives; we had wanted to see the problem areas to better see the issues through the City's & consultants' eyes as alternatives were considered. This request was not honored.

At a later meeting the consultants showed us a drawing with turning radii for various truck types, as demonstrations of possible needed property acquisitions if certain schemes under consideration were adopted. Again we requested copies for study, and again we were not given them.

The final plans and building design / elevations and landscape were *never shared* with the working group – the first time the designs were known or available to the Citizens was upon final submission to the EPC.

The process was, overall, not ideal from the point of view of citizen input, and for that reason we request your Commission to **not consider the City's claim of public involvement in their application**, when our input was only marginally considered for appearance.

Also, the City in its application states they have been working on this project since 2006.
The public only found about the project from a Journal article in mid-2014
That is no way entitles the City to claim public involvement, or conforms to Policy.

David Wood
Design Team Advisory Task Force member.

September 27, 2015

Peter Nicholls, Chairman
Environmental Planning Commission
c/o Planning Department
600 Second St. NW
Albuquerque, NM 87102

Dear Mr. Nicholls,

Please add my voice (once again) as strongly opposed to the construction of the Edith Transfer Station in my neighborhood here in Albuquerque.

I cited many reasons for my opposition in previous letters (sent in January and March) to City Councilors, and the "appropriate" City and Wilson company contacts provided at that time. Later I was informed that the process was over, that the City had voted to proceed. Now I understand that the waste transfer project violates Albuquerque's own Comprehensive Plan and the traffic analysis was based on invalid and "faulty" information.

Traffic has always been one of my primary concerns, as our local streets (like Griegos and Fourth) were never intended for the heavy trucks already ruining our infrastructure. This project involves bringing ALL the City's huge garbage trucks down our narrow, already congested streets. As I stated previously, I've lived in my home for 25 years and previous plans that were to keep commercial traffic on 2nd or Montano never work. Traffic has constantly increased on Fourth and Griegos to the point we can barely access our own homes!

I've also learned that a required zoning change (to proceed with this project) is still pending! This was not revealed previously. In fact we (area residents) were led to believe that that the process of hearings and zoning changes were done, so many of us had simply given up on voicing our continued opposition.

Many other residents, the North Valley Coalition and State Senator Bill O'Neill have provided in depth details about misleading and erroneous information used to proceed with the project. I ask that you take a serious look at all the information submitted and consider that we have been repeatedly duped with sketchy information and sometimes outright LIES about the status of this project that will essentially "finish off" our neighborhood and lifestyle.

Sincerely,

Jamelle Morgan

613 San Lorenzo Ave. NW, Albuquerque, NM 87107

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Greater Gardner Mailing List
ggnaabq@gmail.com

Greater Gardner Neighborhood Association

A North Valley Association of Concerned Albuquerque Residents

[Insert Date]

Mr. Peter D. Nicholls, Chair
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

RE: ZONE MAP AMENDMENT: Proposed Edith Transfer Station
COA Project No. 7006.92 EPC Project # 1010582

Dear Chairman Nicholls:

The Greater Gardner Neighborhood Association has the following concerns about this zone amendment change request, based on R270-1980, and the City Comprehensive Plan.

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

II.B.5

Policy k

Land adjacent to arterial streets shall be planned to minimize harmful effects of traffic; livability and safety of established residential neighborhoods shall be protected in transportation planning and operation.

II.C.1

Policy k

Citizens shall be protected from toxic air emissions.

II.C.1

Policy i

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

II.C.2

Policy c

Water quality contamination resulting from solid waste disposal shall be minimized.

B. **Stability of land use and zoning is desirable; therefore, the applicant must provide a sound justification for the change. The burden is on the applicant to show why the change should be made, not on the City to show why the change should not be made.**

A requested zone change that may not be necessary, does not provide stability of land use zoning, is not a desired community condition. The request makes a mockery of R270-1980.

II.D.d

Policy d

Public service expansion costs, benefits, and effects should be evaluated and balanced between new service recipients, existing users and the community at large.

C. **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.**

II.B.5.k
Policy k

Land adjacent to arterial streets shall be planned to minimize harmful effects of traffic; livability and safety of established residential neighborhoods shall be protected in transportation planning and operation.

II.C.3.d
Policy d

The potential for water and air pollution from regional landfills shall be minimized.

Since there is no specific policy for transfer stations, Policy d, is also applicable to a transfer station and convenience station

D. **The applicant must demonstrate that the existing zoning is inappropriate because (1) there was an error when the existing zone map pattern was created or (2) changed neighborhood or community conditions justify the change, or (3) a different use category is more advantageous to the community, as articulated in the Comprehensive Plan or other City Master Plan, even though (1) or (2) above do not apply.**

Application says, no change is needed. It that is true, then there is no basis for a zone change under R270-1980. Applicant admits they do not have a facility plan. If the use is permitted then the existing zoning is not inappropriate.

As for more advantageous to the Community:

1. If you take their assumption that they can do it anyway, then ipso facto per say, they don't meet the requirement as being more advantageous.
2. If they can do the functions they propose under IP zoning, than a zone change to IP is not more advantageous.
3. Removal of the requirement for consistency with a facilities plan is not more advantageous to the community.
4. Zoning now says, the applicant does not need a facility plan, but has not stated if this is a declaratory ruling, or something else.

E. ***A change of zone will not be approved where some of the permissive uses in the zone would be harmful to adjacent property, the neighborhood, or the community.***

II.C.1.i

II.C.1.i

Policy i

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

You have seen, many policy based letters from Valley residents. Traffic, Water, and Air Pollution are the key areas. Please refer to these letters on specific policies of concern.

Submitted for the record, September 28th 2015

Greater Gardner Neighborhood Association.

Jill Gatwood, Vice President

September 20, 2015

Peter Nicholls, Chairman
Environmental Planning Commission
c/o Planning Department
600 Second St. NW
Albuquerque, NM 87102

Dear Mr. Nicholls,

I am a concerned citizen writing to you about the City's proposed Waste Transfer Station at Edith and Griegos. I have attended the public meetings about this project and still feel my questions have gone unanswered, my voice unheard.

I understand the City has requested a zoning change in order to proceed with this project. I hope you will take my concerns into consideration when reviewing the proposal. I have taken the time to study the Goals and Policies of the Albuquerque/Bernalillo County Comprehensive Plan and would like to point out some policies that will be violated if this transfer station is allowed to move ahead.

II.C.3 The Goal is an economical and environmentally sound method of solid waste disposal which utilizes the energy content and material value of municipal solid waste.

II.C.3.b Encourage solid waste recycling systems which reduce the volume of waste while converting portions of the waste stream to useful products and/or energy.

II.D.3 The Goal is to maintain an adequate, economical supply of energy through energy management techniques and use of alternative and renewable energy sources.

II.D.3.b Efficient and economic use of alternative and renewable energy sources such as solar, wind, solid and liquid waste, and geothermal supplies shall be encouraged.

Pardon my pun, but with this Waste Transfer project Albuquerque sits at a tipping point for the direction of its future. Will we adhere to our stated goals and join forward-thinking cities that use WtE technologies - or will we slink into the dustbin of history with our oversized, environmentally appalling landfills?

The first consideration in this process must be to reduce our quantity of generated waste (waste diversion). Recycling and composting are tried and true techniques to achieve this reduction. I have noticed that few of my neighbors put out their blue recycling bins on trash day. Instead, they pull out their black garbage bins, overflowing with cardboard, plastic and other obviously recyclable materials. Albuquerque residents need better incentive to recycle and compost.

According to a Journal article by Megan Cruz of KOAT dated 9/7/15, the city has an agreement with a local recycler to bring in 3200 tons of paper, plastic and cardboard a month. When the city falls short, it has to pay a shortage fee. In June, the city was short and

paid $16,000. In July there was no penalty. In August we were short again.

We can learn from the many American cities that have successfully reduced their volume of waste. I cite here just a few examples.

California dominates the field of waste diversion. In 1989 they passed a law that required cities and counties to cut their landfill shipments in half by 2000; another law passed in 2011 upped that to 75 percent by 2020.

San Francisco is the undisputed queen of recycling cities in the country, with an 80 percent success rate at keeping discards out of landfills as of 2013. That's partly because of the heightened environmental awareness among San Franciscans. It's also because the City by the Bay has spent the last decade instituting sweeping—and strict—rules about how its residents and businesses can discard items they no longer want. For instance, the city's 2007 ban on disposable plastic bags - the first in the nation - was subsequently adopted by other cities and soon the entire state of California. The ban prompted more use of reusable shopping bags, cutting down on the amount of litter reaching local landfills.

Two years later, San Francisco made recycling and composting mandatory: residents, businesses, and events face fines if they put recyclables or compostables like food waste in regular trash instead of the proper curbside bins.

Guillermo Rodriguez, policy director for San Francisco's Department of the Environment, said, "People like to poke fun at 'San Francisco Values,' but the reason our program is so successful is that reaching Zero Waste has really become one of the core values of San Francisco."

Los Angeles diverted more than three-quarters of its waste from landfills in 2012, and the city has set an aggressive waste reduction goal of 90 percent by 2025, with Zero Waste as an ultimate goal.

Portland, Oregon, has kept 70 percent of its discards out of area landfills, and the diversion rate for households was an impressive 74 percent. That's especially noteworthy given that Portland's waste managers have to coordinate recycling and source reduction programs among the 40 independent private haulers that handle curbside pickup of both recyclables and trash.

Austin, Texas uses single stream recycling. Single stream requires no sorting, as residents are able to recycle paper, glass, metals and plastic all in one recycling cart. What sets Austin apart, though, is their recent introduction of curbside composting to select neighborhoods. Starting in January, 7,800 Austin residences have been using 96-gallon carts to compost organic material for weekly pickup.

When it comes to processing that reduced load of trash, WtE (Waste to Energy) is the wave of the future. It appears that no thought was given to this policy by the drafters of Albuquerque's Waste Transfer Station plan. If the City planners would like to research this topic, listed below are some places to start.

As of 10 years ago, there were 431 WtE plants in Europe and 89 in the United States. The following are some examples.

Waste incineration WtE plants
- Essex County Resource Recovery Facility, Newark, New Jersey
- Lee County Solid Waste Resource Recovery Facility, Fort Myers, Florida, USA
- Montgomery County Resource Recovery Facility in Dickerson, Maryland, USA

Plasma Gasification Waste-to-Energy plants
- The US Air Force Transportable Plasma Waste to Energy System (TPWES) facility (PyroGenesis technology) at Hurlburt Field, Florida

Refuse-derived fuel (RDF) or solid recovered fuel/ specified recovered fuel (SRF) is a fuel produced by shredding and dehydrating solid waste (MSW) with a Waste converter technology. RDF consists largely of combustible components of municipal waste such as plastics and biodegradable waste.

II.C.9 The Goal is to preserve and enhance the natural and built characteristics, social, cultural and historical features that identify Albuquerque and Bernalillo County sub-areas as distinct communities and collections of neighborhoods.

II.C.9.a The City and County differentiate into thirteen sub-areas as shown on the Community Aras map; the unique character and constituent neighborhoods of each area identified on the Community Areas map shall be respected in all planning and development actions.

I bought a home in the North Valley 11 years ago precisely because it was peaceful, quiet and friendly. Older homes, ethnic diversity, a plethora of flora and small businesses to support our community needs were big factors in my decision. It was small-town feel within a major New Mexico city.

I converted the yard to xeriscaping, upgraded appliances to environmentally friendly models and consistently recycle and compost. However, in the intervening years, I have noticed a distinct degradation of our quality of life.

With the implementation of the City's North Fourth Corridor "improvement" plan we have seen an increase of multiple story, high-occupancy buildings in our single-story neighborhood, resulting in increased traffic on our streets. It is no longer practicable to make left turns onto 4th Street. I find myself driving extra blocks to make a left turn at a signal – an increase of driving time, idling time at lights, and gas consumption overall.

It seems the planners of the Waste Transfer Station at Edith and Griegos have not taken into consideration the already increased traffic burden on nearby N. 4th St. Additional huge trucks on our narrow streets will certainly cause further traffic jams and accidents. This combination of plans negatively impacts the North Valley disproportionately, directly violating the City's own policy of preserving and enhancing our neighborhood's qualities. What was once

peaceful and quiet is now a dangerous and increasingly hostile traffic corridor. Let's not make it worse by adding 18-wheeler garbage trucks to the mix!

II.D.5.c The displacement of low income households shall be ameliorated and the objectives of historic preservation and conservation of affordable housing balanced.

Possible Techniques
1) Monitor the effects of home improvement and preservation programs on nearby land costs, property values and rents, and conversion to non-residential uses.

Placing the waste transfer station in an existing neighborhood will almost certainly reduce property values. For low-income residents, this is a double whammy. They could not afford to sell their homes and move to a more desirable location. The homes will become unsalable once the waste facility is installed.

Here is how one local realtor puts it:
" If a home meets 100% of a buyer's criteria and the photos look beautiful...they will IMMEDIATELY cross it off of their list if they don't like the area/neighborhood...end of story. Therefore, the most important factor in purchasing a home begins with the surrounding area. So values/prices will fall. When owners dislike their surrounding neighborhood they will leave; this creates an excess supply of homes on the market which drives the values/prices downward. Combine this with un desirability of the area and values/prices fall further."

Reduced property values will also result in reduced property tax income for the city. It is a downward spiral.

Mr. Nicholls, these are just three examples of the violations to our Comprehensive Plan inherent in this Waste Transfer Station project. Please listen to the community and stop this travesty before it becomes a dreadful reality.

Sincerely,

Carol P. Chamberland

Carol P. Chamberland

609 San Lorenzo Ave. NW, Albuquerque, NM 87107

Nancy Bourne
5029 Guadalupe Trl NW
Albuquerque, NM 87107
(505) 259-1034

September 28, 2015

Peter Nicholls, Chairman
Environmental Planning Commission
600 2nd Street NW, 3rd Floor
Albuquerque, NM 87102

Re: Edith Transfer Station, Case No 1010582

Dear Mr. Nicholls,

I am a concerned resident of the North Valley. I am opposed to the proposed Edith Transfer Station ("ETS") for many reasons. I cannot give them all adequate time and attention, so I only list the ones that are most important to me. I have attended every public meeting since January 2015. I did not attend meetings before that because I was unaware of this project.

1. **Traffic** –The Edith/Comanche area will inconvenience each and every resident of Albuquerque that uses either I-40 or I-25 at or near the interchange. Please be aware that the City has downplayed the ETS as a North Valley issue. Attached is a map showing accidents on the interstate that will be used by the transfer trucks. According to Wilson & Company's Zone Map Amendment letter to you on page 3, paragraph 3, "the transfer trucks will only circulate between the site and Interstate 25 via Comanche Road" and "[Tr]ansfer trucks entering the site will utilize Interstate 25 northbound" and "[T]ransfer trucks leaving the site will take a right onto Edith northbound, Comanche Eastbound, and onto Interstate 25 southbound." In other words, all the transfer trucks and 18-wheelers are instructed by the Solid Waste Division to use only the interstates to get from all the neighborhoods to the ETS, thereby inconveniencing the ENTIRE City of Albuquerque's commuters, the travelers passing through our fine City, the neighbors close by, and all the other businesses nearby using this area to deliver to other parts of the City. The Comanche/Griegos exit located on I-25 in either direction is a complete mess every day with multiple accidents, bottlenecked traffic, and a confusing area to outsiders. The traffic coming west on I-40 and heading north onto I-25 is one little lane (backed up and multiple accidents since being built on the Big I Interchange remodel 15 years ago). That traffic then must merge over two lanes to go north or they will exit onto Comanche/Griegos traffic. By the way, this exit ramp has six lanes by the time you get to Comanche and it still backs up onto I-25 and not just during peak hours. The people on I-25 going South who need to go West onto I-40 run into the entrance ramp of Comanche/Griegos traffic and must try to merge with those getting onto the freeway and then merge over two lanes. Now picture all this traffic with an additional 350 trips of dump trucks and 18-wheelers getting on and off the Comanche/Griegos exits each and every weekday. Please see the two very small turning lanes under the freeway to go North from Comanche to the frontage road to access the freeway. One semi-truck uses both lanes backing up all traffic going east on Comanche. There is not room under the freeway to expand these

lanes. At the public meetings, the City was asked and the public was told that the dump trucks and 18-wheelers are instructed to use these ramps and the freeways whenever possible. Please note that Wilson & Company's letter to you does not mention the 18-wheel semis that will be moving the trash every day to the landfill. All this additional traffic is contrary to **Resolution 270-1980(A)** and will adversely affect the "health, safety, and general welfare of the City." It is in direct conflict with the **North Valley Area Plan pp. 5-6** (all listed goals and issues relate to this issue), **93** ("to provide a balanced circulation system through efficient placement of employment and services, and encouragement of bicycling, walking, and use of transit/paratransit as alternatives to automobile travel, while providing sufficient roadway capacity to meet mobility and access needs."), **112** ("The City and County shall encourage the smooth flow of traffic on arterials.") **and 113** ("The City and County shall limit conflicts between rail travel, roadways, and land use."). Please also see **Comprehensive Plan II-71.C.9.a** ("The City and County differentiate into thirteen sub-areas as shown on the Community Areas map; the unique character and constituent neighborhoods of each area identified on the Community Areas map shall be respected in all planning and development actions."), **II-90.D.3.P** ("Efficient, safe access and transfer capability shall be provided between all modes of transportation."). The residents living as far as Rio Grande Blvd. from Candelaria to Los Ranchos use Griegos to access the freeways. Please see **R270-1980E** ("A change of zone will not be approved where some of the permissive uses in the zone would be harmful to adjacent property, the neighborhood, or the community.")

As a side note, I would like to mention the railroad tracks west of Edith on Comanche. The traffic will back up east of Edith when a long train is going through. This causes a bottle-neck of traffic that the Edith Transfer Station will have to contend with at both its proposed entrance on Comanche and its proposed exit on Edith. See **North Valley Area Plan, p. 14(4)** ("The City and County shall limit conflicts between rail travel, roadways, and land use.").

2. **Pollution** - From listening to area residents at the public meetings, I don't believe the transfer station will be a good neighbor. They have already shown that keeping the property free of pollution, whether it is trash flying out of the trucks, the smell of diesel trucks, to polluting the groundwater, they have for the last 9 years not proved to be good neighbors in keeping the property in good condition as they state they are going to do now. This area is so polluted from the many trucks that use this area to transport their goods. See **minutes of City meetings** where Pat Maloy, owner of Maloy Storage and across Comanche from the site, stated that he has to clean up his property every single day from trash that has blown into his front area from the trucks' bad designs. See **minutes of the City meetings** where Larry Stepp, business owner that is adjacent to the property, has multiple pictures of trash dumped by the public next to the recycling bins, or the picture of the dirt where oil from the trucks has leached into the ground for many years, or hazardous waste from people just dropping it off outside the closed fence during off hours. This industrial area must be considered as unusual, because it has people living right next door. This is contrary to **R270 1980E** ("A change of zone will not be approved where some of the permissive uses in the zone would be harmful to adjacent property, the neighborhood, or the community.") This is why the City has not complied with the Comprehensive Plan, **II-27-5.i** ("Employment and service uses shall be located to complement

residential areas and shall be sited to minimize adverse effects of noise, lighting, pollution, and traffic on residential environments."), **II-28.k.1** ("Amend City Zoning Ordinance to improve lot configuration requirements for sites adjacent to arterial streets to prevent conflicts between private driveways and arterial traffic.") **and 3** ("Use noise impact analysis for noise-sensitive uses proposed adjacent to arterial streets; analyze projected traffic and noise impacts of proposed street widening and similar project upon adjacent neighborhoods and mitigate accordingly.") **See also North Valley Area Plan, pp. 65 (air pollution) and 87 (water quality).**

3. **Water Quality** - I have a well as my only source of water for my home. It is only 100 feet deep. There are people living closer to this site that have wells that are only 30 feet deep. There is not adequate depth to the groundwater to minimize percolation or leaching of pollution. See policy **II-56-d.1 of the Comprehensive Plan.** It states "sites will have geologic and soil characteristics and adequate depth to groundwater . . . ." The North Valley is downhill from the ETS. See **North Valley Area Plan, page 87** ("The valley floor . . . generally slopes from north to south with an average slope of 5' per mile and has little or no slope from east to west.") Any spillage, even through cracks in the concrete or asphalt, will go right into the groundwater and right to the North Valley neighbors' wells. Spillage is a very good possibility and/or water will permeate through their multiple asphalt parking lots. Contrary to **II-56-3.d.1** ("Select any additional sites which will not contaminate groundwater. Sites will have geologic and soil characteristics and adequate depth to groundwater which will minimize development or percolation of leachate. Where existing landfill sites do not have adequate natural protection against groundwater contamination, use impermeable liners, leachate collection and treatment systems, and groundwater monitoring well networks."), the City cannot possibly clean up all the oil and gas that has already seeped into the dirt areas from their trucks being parked on that site for the last 12 years and then add impermeable liners. Since household hazardous waste will be stored there for at least 90 days (quoted from an open City meeting), the City have not mentioned any way of developing and implementing a program for preventing hazardous substances from entering the aquifer and the water supply system. This is also contrary to **II-52-C.2.c.9** ("Prevent the disposal of hazardous waste in municipal or County solid waste landfills."); **II-52-C.2.c.2** ("Use impermeable liners with leachate collection and treatment system in landfills which lack adequate natural groundwater protection.") **and 8** ("Site future landfills away from drainage channels and natural water courses."). At a minimum, all overflow ponds, historic ditches, and aquifers should have in place monitoring systems. **II-56-C.d.4** ("Establish a groundwater monitoring program at all landfills which includes the installation of monitoring wells.")

4. **Overburdened Area** – Contrary to **II-57.3.e.1** ("Improve coordination between landfill site selection and city-wide land use planning."), this area has multiple businesses that use 18 wheel trucks to move their products throughout the day to various places in the City. There have been multiple accidents in this area even prior to the transfer station being built. I have tried using the Griegos area to get from place to place in the City and now use the smaller roads away from the traffic on Griegos. I heard a businessperson at one of the City meetings, say that he instructs his truck drivers NOT to use the on and off ramps at the freeway on Griegos, because of the multiple accidents in the area. As an avid bicycle rider, I never use the area near

Edith/Comanche/freeway. It is a deathtrap. Comanche/Griegos is a City designated bikeway that goes all the way from the Rio Grande Blvd. to Tramway Blvd. There are four ghost bikes along this stretch. This is also one of the few routes taken by North Valley residents that live off of Rio Grande and Griegos. These people are very inconvenienced by the congestion in trying to get to the freeways the only way available to them. The train is a whole other issue. I have witnessed the west bound traffic backed up into the intersection of Comanche and Edith blocking the entire area from moving. This will affect the ETS's trucks and further burden the area. Please see **II -5.d.1** (no environmental impact analysis of air has been done), **5.d.3** (the City picked this site without any input from the surrounding areas or the many neighborhoods that will be effected by this), and **II.B.5.k** (the safety of all of Albuquerque has not been taken into account by the City picking this site). Please also see **R270-1980(G)** ("the cost of land or other economic considerations pertaining to the applicant shall not be the determining factor for a change of zone").

5. **Common Sense** – Is the City crazy? Who builds a major transfer station in the middle of a City? Dumps, transfer stations, and landfills are placed outside of populated areas because they are a nuisance! They attract bugs, mice, rats, and other disease carrying vermin. I don't know how clean you try to make a dump, it does not belong in the middle of a City where it can cause all sorts of neighborhood problems! Please note that on the first page of the Wilson & Company's letter, they state, "The proposed use of the site would remain very similar to its current use". When is parking garbage trucks, a maintenance yard, and a gas station the same as a transfer station that is going to have **all** the trash from every resident of the City dumped there, picked back up, and transported to the landfill considered "very similar to its current use"? This is against the **North Valley Area Plan at pp. 5(1), (2), (3); (6), (7), (8).** Please also see **R270-1980(G)** ("the cost of land or other economic considerations pertaining to the applicant shall not be the determining factor for a change of zone").

6. **Forward-thinking** - Let's get with the 21st Century! Look to Europe for ideas on how to turn trash into energy. Most of my trash in the summer is green waste from all the weeds that grow in my yard. Can't we find a way to separate and convert green waste to mulch or fertilizer that can be then be purchased by the City residents? Can we have deposits on our glass bottles? The state of Oregon has been doing this successfully for more than 40 years! The City of Albuquerque doesn't even have a compacter to reduce what trash goes to the landfill. I believe there are ways to make our trash productive rather than burdening our land with more waste, inconveniencing our neighbors, and making a whole City have to deal with an even worse traffic issue. Please note in Wilson & Company's letter, they mention a compacter, but there is no specifications stated in the letter or no map showing a compactor. At the City meetings, they explained the transfer trucks go into the transfer building and dump their loads into a tilted floor that holds the semi-trucks. When the semi-trucks are full they leave with their load to the dump. When do they compact the trash? There is a mention of the first page of a "waste-to-energy facility." They mention recycling green waste, but there is not an area on their maps that show that is in the plans. Instead, they are just moving the trash from this dump to the landfill. This is contrary to Comprehensive Plan, **II-55.C.3.a.1** ("Continue investigating and using up-to-date equipment and collection methods."), **II-55.C.3.b.1** ("Encourage marketing of containers which

are biodegradable or recyclable; support legislation which prohibits distribution and sale of beverages in non-recyclable cans or non-returnable bottles.") and .5 ("Periodically evaluate the feasibility of a recovery plan to reutilize valuable materials from municipal solid waste and to generate energy for local use or sale."), and II-78.D.3.b.3 ("Consider development of a recovery plant to produce energy from municipal waste.").

Please reject this proposed change in zoning of the transfer station and request the City build less invasive transfer stations outside of City limits in each of the City's quadrants where growth is occurring and where it will be less harmful to all the residents of the City of Albuquerque and more in compliance with the Comprehensive Plan and city-wide land use planning.

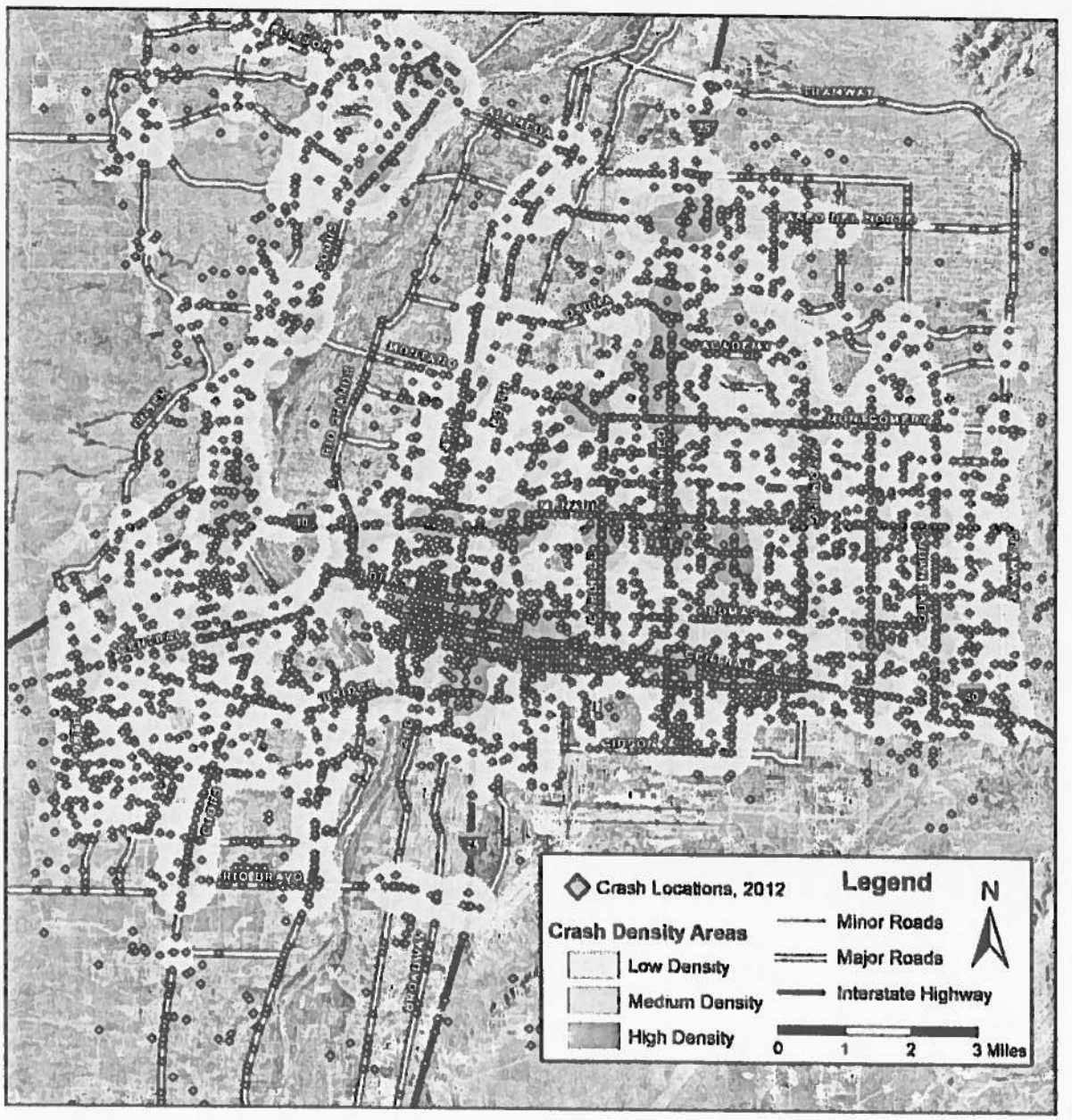
Very truly yours,

Nancy Bourne

Nancy Bourne

Enclosures

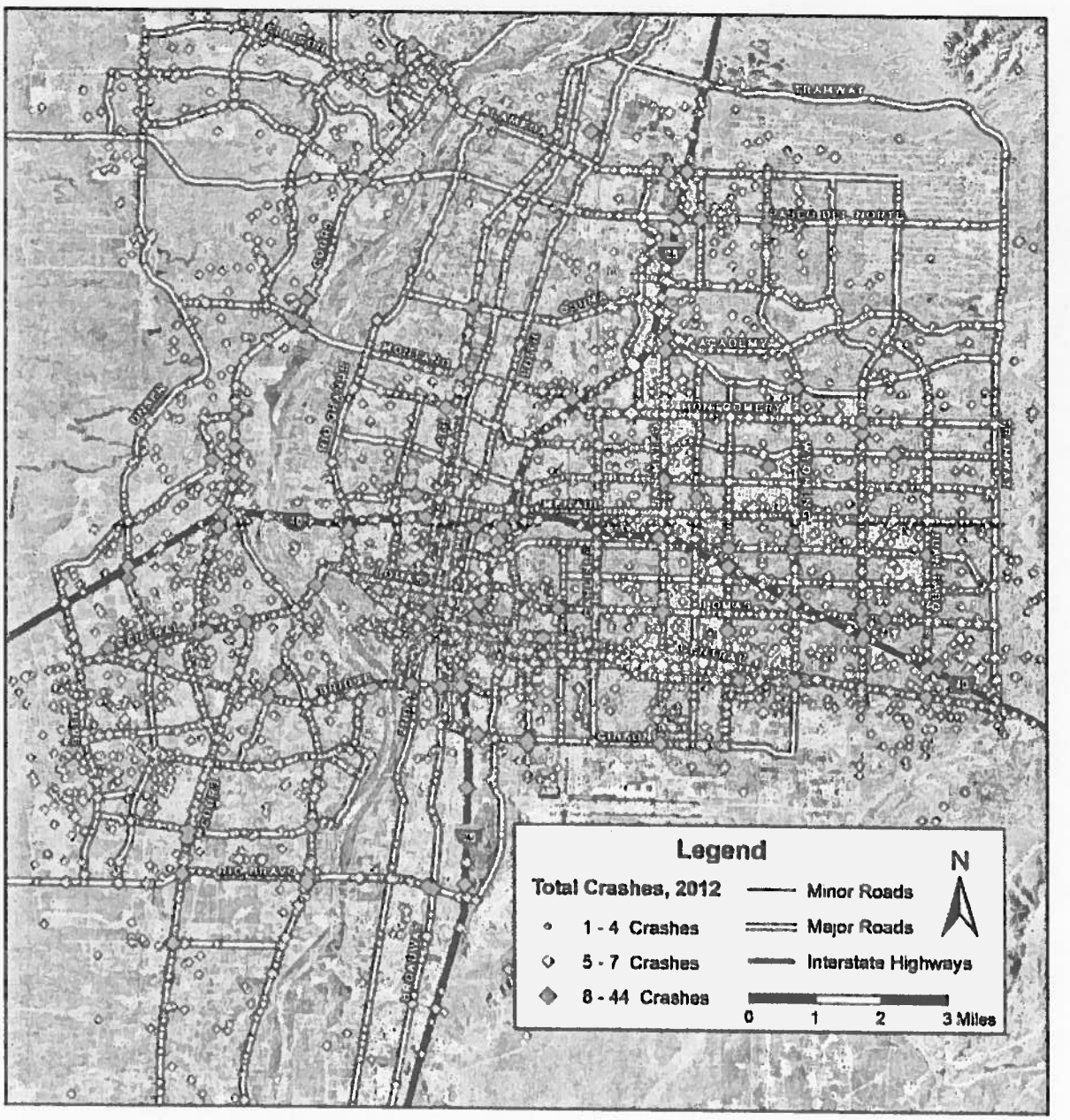
Map 14: Density[38] of All Crashes in Albuquerque, 2012



All maps are available in high-resolution color at tru.unm.edu.

[38] All density maps in this report use a green dot to identify a location with one or more crashes in 2012. Crash density color is calculated using both the number of crashes at each location and the proximity of each location to other crashes.

Map 13: Albuquerque Crashes, 2012



All maps are available in high-resolution color at tru.unm.edu.

Nancy Bourne
5029 Guadalupe Trl NW
Albuquerque, NM 87107
(505) 259-1034

September 28, 2015
VIA HAND-DELIVERY AND EMAIL

Peter Nicholls, Chairman
Environmental Planning Commission
600 2nd Street NW, 3rd Floor
Albuquerque, NM 87102

Re: Proposed Edith Transfer Station, Case No 1010582

Dear Mr. Nicholls,

I am the South Guadalupe Trail Neighborhood Association representative. I have written to the members of this Association and asked for their opinions of the proposed Edith Transfer Station ("ETS"). These are the comments I have received.

1. **Traffic** – The majority of the people in my neighborhood are opposed to the proposed Edith Transfer Station because of the added traffic burden it will cause. The shortest route to get on I-25 from this neighborhood is by way of Griegos/Comanche. There are many other North Valley associations that utilize this way to get on I-25 and also use these entrances to get on I-40, especially going East. The impact the proposed ETS will have on traffic was mentioned as especially injurious for this area. All this additional traffic is contrary to **Resolution 270-1980(A)** and will adversely affect the "health, safety, and general welfare of the City."

2. **Bicycle Riders** – My next most frequent complaint from the residents are the bike riders. Many of the neighborhood residents commute either for enjoyment or as a way to get to work. They informed me that this is one of the few East/West corridors for bicyclists in the City. Griegos/Comanche goes from Rio Grande Blvd. to Tramway Blvd. in a straight line. There is Tramway to the North and a patchwork along Silver Ave. but ends at Washington in the SE part of the City. There is the North Diversion channel, but you have to use Griegos/Comanche to get to it from the North Valley. It also veers to the North part of the City. Griego/Comanche also has four ghost bikes along it because the bicyclists are forced to share the road with automobile traffic.

3. **Pollution** – I heard multiple neighbors complaining the proposed ETS will further pollute the already overburdened North Valley. The North Valley has inversions of air most days in the winter. The air settles in the lowest part of the City. That is right where our area is. We have no monitoring station for the air pollution near us, even though we are one of the most polluted areas of the City. This is contrary to **R270 1980E**. This industrial area must be considered as unusual, because it has people living right next door. Dumps, transfer stations, and

landfills are placed outside of populated areas because they are a nuisance! They attract bugs, mice, rats, and other disease carrying vermin.

4. **Water Quality** - I have a well as my only source of water for my home. It is only 100 feet deep. There are people living closer to this site that have wells that are only 30 feet deep. There is not adequate depth to the groundwater to minimize percolation or leaching of pollution. See policy **II-56-d.1 of the Comprehensive Plan.** It states "sites will have geologic and soil characteristics and adequate depth to groundwater . . . ." The North Valley is downhill from the ETS. Any spillage, even through cracks in the concrete or asphalt, will go right into the groundwater and right to the North Valley neighbors' wells. Spillage is a very good possibility and/or water will permeate through their multiple asphalt parking lots. Contrary to **II-56-3.d.1** ("Select any additional sites which will not contaminate groundwater. Sites will have geologic and soil characteristics and adequate depth to groundwater which will minimize development or percolation of leachate. Where existing landfill sites do not have adequate natural protection against groundwater contamination, use impermeable liners, leachate collection and treatment systems, and groundwater monitoring well networks."), the City cannot possibly clean up all the oil and gas that has already seeped into the dirt areas from their trucks being parked on that site for the last 12 years and then add impermeable liners. Since household hazardous waste will be stored there for at least 90 days (quoted from an open City meeting), the City have not mentioned any way of developing and implementing a program for preventing hazardous substances from entering the aquifer and the water supply system. This is also contrary to **II-52-C.2.c.9** ("Prevent the disposal of hazardous waste in municipal or County solid waste landfills."); **II-52-C.2.c.2** ("Use impermeable liners with leachate collection and treatment system in landfills which lack adequate natural groundwater protection.") **and 8** ("Site future landfills away from drainage channels and natural water courses."). At a minimum, all overflow ponds, historic ditches, and aquifers should have in place monitoring systems. **II-56-C.d.4** ("Establish a groundwater monitoring program at all landfills which includes the installation of monitoring wells.")

Thank you for your attention to this matter. The South Guadalupe Trail Neighborhood Association would appreciate your denying this application.

Very truly yours,

Nancy Bourne

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5029 Guadalupe Trl NW
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Thank you for your attention to this matter. The South Guadalupe Trail Neighborhood Association would appreciate your denying this application.

Very truly yours,

Nancy Bourne

Nancy Bourne

Henry, Dora L.

From: Ken Balizer <kenbalizer@gmail.com>
Sent: Monday, September 28, 2015 9:45 AM
To: Henry, Dora L.
Subject: Letter to EPC re: Edith Waste Transfer Station Project 1010582
Attachments: Transfer Station Letter to EPC.docx; [NVC HIA] Final HIA on the North Valley - kenbalizer@gmail.com - Gmail.webarchive

Dear Ms.Henry;
Please accept this letter and attached Health Impact Analysis regarding the above project. Sincerely, Ken Balizer

PS Please contact me at 505-573-2648 if there are questions or you do not receive the above materials.

September 27, 2015

Peter Nicholls, Chair
Environmental Planning Commission
City of Albuquerque
PO Box 1293
Albuquerque, NM 87103

Re. Waste Management Station at Edith and Cherokee NE
Proposed Zone Map Amendment, EPC Project 1010582

Dear Chairman Nicholls;

In a July 10 editorial the Albuquerque Journal, gave an unqualified endorsement to the Solid Waste project, the Edith Transfer Station, accepting the City perspective without question.

For example, the Journal states, "The City has listened to the public and made adjustment to the plan". In reality, the City made the decision to create an all City waste transfer station and decided where to put it long before the neighborhood ever heard about the project. The public input is all about the "design of the building," the least consequential aspect of the project.

Does the Solid Waste Department plan really help the environment as they claim? A City concerned about the environmental impacts of its solid waste stream would be putting more effort into diverting recyclable and compostable material away from the landfill and into productive uses. It wasn't that long ago (2009) that Albuquerque announced a Zero Waste goal. More recently Zero Waste as a goal seems to have disappeared. Less waste means less garbage into the landfill, less greenhouse gas and less danger of contamination

of the aquifer. It also means less justification for the transfer station as there is less waste to haul and bury.

The Journal says "Money Matters" and that is the big reason for building a transfer station. However, we can't lightly ignore the costs to the health, safety and property of the people and businesses living and working nearby. Health professionals were contracted by the North Valley Coalition to conduct a Health Impact Analysis (HIA) of the proposed Waste Transfer Station. That analysis demonstrates disparate impacts on the 18,000 closest neighbors in terms of health, air and water pollution, traffic, noise and loss of property values. Reading the HIA report leaves one asking: **Does the City's waste transfer station really save money or does it just shift the burden of costs to its closest neighbors?**

To sum up: the City has not listened to the community. A waste transfer station at that location was decided without public knowledge. The project does not respect the environment as a zero waste agenda would do much more to reuse and recycle the waste and reduce the amount being buried at the landfill. And, it is questionable whether it saves money given the uncompensated cost burden for the neighbors and the forgotten alternative of reducing waste rather than hauling it to the landfill.

Solid Waste could best use our tax dollars to help us all to produce less garbage and divert more waste to beneficial uses.

Clearly The Solid Waste Department has not met the tests laid out in City Enactment 270-1980 for a Zone Map Change. Section 1A. The proposed zone change is not consistent with the health, safety, morals and general welfare of the City. And, Section 1E, A proposed zone change shall not be approved

where some of the permissive uses in the zone would be harmful to adjacent property, the neighborhood or the community. Clearly the North Valley Health Impact Assessment of the Proposed Edith Transfer Station, August 2015 demonstrates that the facility being proposed by the Solid Waste Department is not beneficial and is harmful to the health and well being due to the extra burden of traffic, air quality, noise, water quality, odor, litter and loss of property value. (the HIA is incorporated here by reference).

Furthermore, Section 1G of 270-1980 states "The cost of land or other economic considerations pertaining to the applicant shall not be the determining factor for a change of zone." The argument that the Solid Waste Department makes over and over is that by building this facility at the proposed location they will save $75million over 20 years leads one to believe that this is the overriding concern of the City. Even the Albuquerque Journal in making its case (Money Matters) for the WTS emphasizes this conclusion. In a Executive Communication to the City Council EC 14-44 the Solid Waste Department states, "The primary goal of building a transfer station is to reduce the overall cost of transporting waste to the landfill." This is not a valid reason for a zone change under 270-1980. Even if saving money or making a profit was a valid excuse for a zone change, the error in logic is to ignore the cost of the uncompensated negative impacts on the 18,187 neighbors as identified by the HIA, Aug, 2015.

For these reasons, the Jardines Escondidos Homeowners Association Board of Directors does not find the Edith Transfer Station in keeping with the North Valley Area Plan or the Albuquerque Bernalillo County Comprehensive Plan and is unanimously opposed. We ask the EPC to reject the Solid

Waste Department proposal as the wrong project in the wrong location.

Sincerely,
Ken Balizer, Vice Chairman,
Jardines Escondidos Homeowners Association

cc. Karen Hudson, EPC
Moises Gonzales, EPC
Victor Beserra, EPC
Derek Bohannon, EPC
Maia Mullen,EPC
James Peck, EPC
Bill McCoy III, EPC
Vicente Quevado, Staff

Henry, Dora L.

From: Marcia Finical <marcia_finical@yahoo.com>
Sent: Sunday, September 27, 2015 4:33 PM
To: Henry, Dora L.; Quevedo, Vicente M.; David Wood
Subject: objections to the proposed Edith Transfer Station

September 27, 2015

Dear EPC,

I live at 141 Griegos Rd NW, less than .4 of a mile from the proposed Edith Transfer Station. I am very concerned about the effects of the Edith Transfer Station on the air and water quality within my neighborhood and adjacent areas.
When GCC and Friedman Recycling applied for operating permits, the Greater Gardner Neighborhood Association where I live was told by the City's Air Quality Board that there was no way to measure the cumulative impacts of toxic particular matter in the neighborhood. Yet 105 out of 694, or over 15% of facilities permitted to emit air pollutants in Bernalillo County are located within a 2-mile radius of the proposed Waste Transfer Station. Given that Albuquerque encompasses 189.5 square miles, and the above mentioned 2 mile radius (or 12.6 square miles) equals less than 6.7% of the total square miles of the City, this tiny area is home to over 2.275 times the number of permitted air polluters compared to the rest of the City.

Here are some of the policies adopted by the EPC that directly address my concerns:

EPC Policy II.C.1. – The Goal is to improve air quality to safeguard public health and enhance quality of life
Policy k – Citizens shall be protected from toxic air emissions.
Policy g – Pollution from particulates shall be minimized.

Given that the average high temperatures in Albuquerque are over 80 and 90 degrees in June, July, August, and September, can you imagine the smell of over 2 million pounds of garbage every day that will be transported in and out of this area? And what happens during the summer when air inversions trap pollutants at ground level instead of circulating them away? The Edith Transfer Station will only magnify the stench, trapping it inside the city where it could remain for weeks if not months and adversely affect the health of the residents and businesses nearby. With the siting of this project at Edith and Comanche, the City is disregarding its own policies concerning air quality, toxic air emissions and quality of life.

I'm also concerned that the City will have inadequate storm water runoff collection devices during monsoon rains.

EPC Policy II.C.2 Water Quality
Policy a - Minimize the potential for contaminants to enter the community water supply.
Possible techniques:
2. Systematically monitor and analyze groundwater for contaminants at various locations and depths in the aquifer.
4. Develop and implement a program for preventing hazardous substances from entering the aquifer and water supply system.

Henry, Dora L.

From: Denise Wheeler <deniserw@unm.edu>
Sent: Friday, September 25, 2015 4:00 PM
To: Henry, Dora L.; Quevedo, Vicente M.
Cc: Peggy Norton
Subject: Proposed Edith Waste Transfer Station Project 1010582
Attachments: ltr to Peter Nicholls.docx; ATT00001.txt

Please confirm that you have received the attached document and that it has been added to the public record.

Thank you

Peter Nicholls, Chairman
Environmental Planning Commission
c/o City of Albuquerque Planning Department
600 2nd Street NW, 3rd Floor
Albuquerque, NM 87102

Re: Project # 1010582

I am writing to voice my opposition to the Proposed Edith Waste Transfer Station at 4600 Edith NE. I ask that my letter be part of the public record.

A zoning change from M-1 Light Manufacturing to SV-1 for M-1 Uses should be denied. This project makes major changes to the existing site. The City proposes to dump all the trash for the City of Albuquerque at this site; proposes to compact that trash and load it into larger trucks; proposes to add parking for employees, the public and visitors with more than 300 parking spaces. The City proposes to take household hazardous waste and be able to store that waste for up to 90 days. The City proposes to recycle major and minor recyclable materials. These changes are among the many changes required to create a waste transfer station. These changes are out of bounds for a M-1 Light Manufacturing Zone designation and as such pose a major change to the current site.

The project conflicts with Enactment 270-1980 specifically Section D. (2) in that it would significantly change the neighborhood and community conditions, and Section 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. This project will be harmful to the adjacent property, the North Valley and the city as a whole. The project will increase noise, traffic, air pollution, contaminate the water table and ditch system and increase health risks by bringing all of

Albuquerque' s trash into the north valley where it will be dumped, scooped up, loaded into bigger transfer trucks to be driven to another site. The resulting traffic, noise, potential water contamination, housing of household hazardous waste, will result in the North Valley becoming the trash bin for the City of Albuquerque. The character of the area will be significantly impacted in a negative manner. As the city grows the need for more trash collection will increase and more and more trash would need to be dumped into the center of the city. Pollution from toxic and cancer causing diesel fuel will be increased hundreds fold. Pollution from the increase in public vehicles including employees and visitors to the site will affect those working at the site, those on adjacent property, those traveling through the area by vehicle, bike or walking as well as the city as a whole. People walking and biking through this area will be adversely affected by the increase in traffic and noise from the increase in the number of trash trucks and other vehicles. The criteria has not been met.

The reason given for this project is that it will save money. The savings are projected for 20 years. With regard to Policy II.D.d. Public Service expansion costs, benefits, and effects should be evaluated and balanced between new service recipients, existing users and the community at large. There does not appear to be a fiscal analysis of the potential savings and or cost to the citizens. There is no guarantee that a rate increase will be forestalled. There is no guarantee that this proposed project will not need significant improvements and expansion over time as it becomes obsolete. The criteria has not been met.

According to the Albuquerque/Bernalillo County Comprehensive Plan II.C.3.a and b: The Goal is an economical and environmentally sound method of solid waste disposal which utilizes the energy content and material value of municipal solid waste. Policy a Planning and implementation of more efficient

and economical methods of solid waste collection shall be continued. Technique 2) Encourage designs utilizing advanced waste collection technology (e.g. hydraulic or collection tube systems). This criteria is not met. There is no comprehensive recycling or green waste system within the project. There is no comprehensive system to recover or reduce waste. The criteria has not been met.

This project is using the same old school method of collecting trash and dumping it somewhere. It does not have advanced methods of reducing its volume, its reclamation, or its use to the city. II.c.3.b.5) There is no feasibility study for recovery to reutilize valuable materials from municipal solid waste and to generate energy for local use or sale. The criteria has not been met.

With regard to II.C.3.d: The potential for water and air pollution from regional landfills shall be minimized. Water and air pollution will not be minimized but rather increased. Water will be used throughout the day to wash down the concrete. Concrete fails and cracks. Liners below the concrete will fail at some point allowing the water to seep into the water table. There will be increased hard surfaces for the parking lots that will allow accumulation of standing water. The water from the parking surfaces and the floors where the trash is dumped will be contaminated by the contents of the trucks leaking, spilling and being dumped, fluids from the trucks, fluids from the repair bays, public and employee vehicles. The existing maximum allowable discharge of 47.6cfs is not changed to accommodate the increase in needed capacity for drainage creating further potential problems. In the event of heavy rains the streets, ditches and water table will be contaminated. The criteria has not been met.

Section II.C.4 Noise: The Goal is to protect the public health and welfare and enhance the quality of life by reducing noise and by preventing new land use/noise conflicts. Noise of more than 600 trash collection trucks per day, plus transfer trucks, employees, visitors and the public will not be mitigated by a few trees and landscaping. Diesel trucks are loud, 600 diesel trash truck

trips a day is very loud. Trucks will be going in and out of the site. They will be idling on the site on Comanche and on Edith. They will be idling at the freeway entrances and exits. They will be driving on the freeway and other roadways. Any trash compacting and sorting will be additional increased noise. This is a centralization of noise rather than a reduction in it. There is no noise study available to the public. The criteria has not been met.

II.C.9 9. COMMUNITY IDENTITY AND URBAN DESIGN: The Goal is to preserve and enhance the natural and built characteristics, social, cultural and historical features that identify Albuquerque and Bernalillo County sub-areas as distinct communities and collections of neighborhoods. This goal is undermined by the proposal. The criteria has not been met.

Policy c: The identity and cohesiveness of each community shall be strengthened through identification and enhancement of community Activity Centers that have a scale, mix of uses, design character, and location appropriate to the unique character of the community. (See also policies under "Activity Centers")

This project will not fit into the community. It will change the identity to one of trash heap rather than preserving or enhancing the natural and built characteristics. Each day will see hundreds of trash trucks and other vehicles dumping waste. That is what will be seen as you drive the freeway and as you drive, bike or walk the roadways in this area.

II.D.3.b.3. Policy b Efficient and economic use of alternative and renewable energy sources such as solar, wind, solid and liquid waste, and geothermal supplies shall be encouraged. This is not met. There is no plan for alternative or renewable energy sources.

Traffic problems will increase and intensify if this project is allowed. There are already traffic problems getting off and on the freeway at Comanche and I-25. The freeway is congested during peak hours and shut down almost weekly

with traffic accidents during the daytime. It is not safe to walk or ride a bike on Comanche especially near the existing waste site. No safety accommodations have been made for pedestrians, bikers or people traveling through the area on their daily commutes. I have watched as trash trucks wait for the light, backing up traffic on Edith and on Comanche. This will be increased to an intolerable degree with the proposed traffic to and from the proposed site. People will then seek alternative means to get off and on the freeway and to avoid Edith. Businesses using Comanche and Edith will be affected as traffic congestion will be increased. The project will negatively impact traffic on both I-25 and I-40. The goals of migrating traffic cannot be met.

This proposal is a solution to the wrong problem. The problem is not how do we get the trash from here to there. It is how do we as a community reduce our use, reduce our trash, reduce our waste. Trash collection trucks driving a few less miles a day will not affect the needed reduction and redistribution of our waste. We need systems to effectively and efficiently recycle, to compost our green waste. Just doing those two things would reduce the amount of waste being trucked through our city by at least 25%. We need to cut the need for trash collection rather than dump it from the house to the trash bin, from the trash bin to the trash collection truck, from the trash collection truck to the floor of a building in the center of town, from there to be shoved into a bigger trash truck to be dumped and buried on the outskirts of town. We need a project that looks to the future, that looks to protecting our citizens, our environment, our water, air, our fragile resources and irreplaceable environment. This project is in conflict with the North Valley Area Plan for these reasons it should be denied.

Denise Wheeler

3565 Rio Grande Blvd. NW

Albuquerque, Nm 87107

September 24, 2015

Peter Nicholls, Chair
Environmental Planning Commission
c/o Albuquerque City Planning Department
600 Second Street NW, 3rd Floor
Albuquerque, NM 87102

Project #1010582, City of Albuquerque zone amendment and site plan

Dear Chairman Nicholls:

I oppose granting the City of Albuquerque Department of Municipal Development a zone map amendment and site development plan approval for a transfer station at the southeast corner of Edith and Griegos. I have been involved in preparing a Health Impact Assessment (HIA) of the proposed project and have attended all city and community meetings. I have spent many hours educating myself on this project and conclude that it violates Section 1 (E) of Enactment 270-1980 which states "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". I think the facts indicate it would be harmful to all three of those entities.

Adjacent to the city property on the south is American Marine, a small business that has been in business at that location for 40 years. The Edith entrance to the site will be moved south 70 feet and the semi trucks (130 one way trips a day) will be driving in and out along the north side of his property. The noise and fumes will make this location unworkable for his business. He will not be able to stand in his parking area to talk with his customers about the vehicles they bring in to his shop. Conway Electric, adjacent to the east, currently experiences problems with noise, fumes, and odors. Odors from garbage and fumes are always apparent and more so when trucks are waiting to be fixed. This will obviously be increased as more garbage passes through the site and diesel trucks are added. Maloy Storage, across the street on Comanche, has problems accessing Comanche with the current traffic load and will spend much more wait time trying to access Comanche with the increased truck traffic load (173%).

The City has represented the site plan as state of the art and that there will be no impact beyond the footprint of the site. The preliminary traffic study ignored the impact of the convenience center traffic and their estimate of convenience center traffic is very low, as noted in the Review of Traffic Impacts by Sustainable Systems. The other convenience centers are on the edge of town, which is where garbage should be. If a convenience center is built in the middle of the city, more than 25% of the traffic to outlying convenience centers will use the more central location. These vehicles will be idling while waiting in line, polluting the air with gasoline emissions.

Because of traffic flow created by the design of the project, garbage trucks will be polluting the air with emissions as they wait for a left turn (no light) across

Comanche to the site, 18-wheelers will be polluting the air with diesel emissions as they wait for a left turn light at Comanche/Edith, as they wait for a left turn (no light) across Edith onto the site, and as they leave the site (no light) to take right turns at those intersections. There has been no report prepared by the City to study the effects on air quality. The site is currently permitted to release up to a maximum of 0.42 tons per year of volatile organic compounds (VOC's). However, no data is currently available on actual emissions from this site. WHY NOT? Therefore, it is impossible to quantify the total pollution created by the current traffic, additional garbage truck trips, 18 wheelers and private vehicles, and the data should include both on-site and off-site (while idling in the roads) emissions.

This additional pollution directly impacts residences nearby, the closest one being within 100 feet, an apartment complex within 700 feet, not the 1300 feet the city indicates is the closest. However, air MOVES and with it goes the pollutants so the effect is far beyond the nearest residences. There will also be negative impacts on cyclists, pedestrians, and children.

Nearby intersections affected by the additional traffic have ratings of D and F. While the routes of the garbage trucks are primarily between the site and I-25, there has been no thought given as to the routes of the private vehicles for the convenience center. They will be coming through these D and F intersections. There is no contingency plan offered by the City but what will happen when the highway is closed (which has happened at least 5 times in the last month)? These trucks will be using alternative streets which impact nearby neighborhoods and these intersections.

The City claims Section 1D (2) of Enactment 270-1980 "the existing zoning is inappropriate because of changed community conditions" justifies the change. The City seems to consider community to be the entire City of Albuquerque – their argument being "The City's population continues to grow and there is more demand for services". I consider the community to be more a collection of neighborhoods and could be expanded to mean the North Valley. The ABQ/BernCo Comprehensive Plan supports this latter definition (IIC9). This growth, however, is primarily on the West Side, not in the North Valley. Changed community conditions on the West Side don't support a zone change in the North Valley. Additionally, the City uses the argument "with budgets and resources continuing to shrink, the City has to become more nimble and efficient in providing services". However, Section 1G states "The cost of land or other economic considerations pertaining to the applicant shall not be the determining factor for a change of zone". Therefore, the City's reasoning is a violation of Section 1G of Enactment 270-1980.

I am also concerned that a zone change for this site makes it easier for a future applicant in the area to claim 1D(2) "changed neighborhood or community conditions justify the change". This proposed zone change and project WILL change the neighborhood and community.

I would also like to point out violations of Section 1C of the same Enactment: "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". While significant is a subjective determination, I will discuss elements I think would fit that determination.

Not providing an air quality study of the effects of the proposed project violates IIC1k of the Comprehensive Plan. "Citizens shall be protected from toxic air emissions. IIC1k1 states possible techniques "Develop an air toxic program to inventory existing sources of toxic emissions and assess the air quality effects of existing and future industries". As noted above, data is not available on the existing sources of the site and there has been no assessment of the proposed future project.

The Goal (of Solid Waste) is an economical and environmentally sound method of solid waste disposal which utilizes the energy content and material value of municipal solid waste. Policy IIC3a states "planning and implementation of more efficient and economical methods of solid waste collection shall be continued". Possible techniques (1): "Continue investigating and using up-to-date equipment and collection methods". There is no indication that this project satisfies this technique. The project continues the method of picking up garbage in trucks, dumping it (at the transfer station), picking it up in another truck, driving it to a landfill and dumping it. There is no discussion of any innovative methods of reducing volume, if only by compaction.

Policy IIC3b states "Encourage solid waste recycling systems which reduce the volume of waste while converting portions of the waste stream to useful products and/or energy". I am a gardener and a prime method to accomplish this goal would be to accept green waste as its own waste stream and compost it. The Rainbow Transfer Station in Huntington Beach (an example on the city web site www.abqets.com), has an area set aside for compost dumping and selling compost products; they also rent out bins for this purpose. That is not part of the design of this project and there is not space accommodation for it. At the July 21 public meeting, a person asked if the site would be collecting green waste or at least Christmas Trees (like at Eagle Rock). Ms. Savina Garcia answered there were no plans for this.

In addition to Huntington Beach, two other transfer stations were identified as being similar to this. However, the Tacoma station is actually located on a 200 acre landfill in South Tacoma. The Phoenix station is located on the outskirts of the city. Another station closer to home, Buckman, is located at the Santa Fe city limit. Nobody moves garbage to the middle of town.

There are numerous policies in the Comprehensive Plan protecting community identities. The Central Urban Area (IIB6) is promoted 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. Perhaps this is why the Little League (public facilities/activities) located just down the street. A transfer station does not fit any of the three categories. And who puts a transfer station in the historic center of the city?

The applicant could not demonstrate that the existing zoning is inappropriate (1D of Enactment 270-1980). I have cited several instances where this proposed project violates the ABQ/BernCo Comprehensive Plan which violates 1C of Enactment 270-1980. The applicant has cited economic reasons as justification for the zone change which violates 1G of Enactment 270-1980. And I have articulated negative effects on adjacent properties and neighborhoods which supports 1E of Enactment 270-1980, "a zone change shall not be approved where some of the permissive used in the zone would be harmful to adjacent property, the neighborhood or the community".

I therefore ask that you deny the request for a zone change and site plan approval by the City of Albuquerque, project #1010582.

Sincerely,

Peggy Norton

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

#1010582

Mr Nicholls, Chair EPC

I oppose the zone change at 4600 Edith, because what the city plans to build and do with the garbage is a waste of money. It does not follow Policy 11.0.3 Community Resource Management

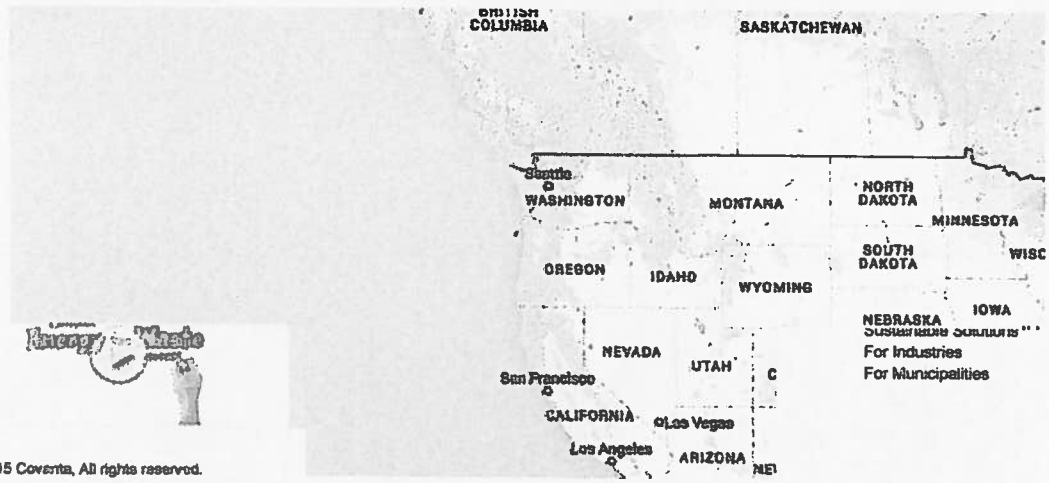
3. Energy Management

b. Efficient and economic use of alternative and renewable energy sources such as solar, wind, solid and liquid waste.

3. Consider developement of a recovery plant to produce energy from municipal waste.

The city plan is archaic, outdated and costly. The money should be spent on Energy from waste plant.

Marian Sanioni



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Energy-from-Waste Facility Americas-Facilities

Locations

Safe, Reliable Renewable Energy for Communities

Covanta currently operates over 40 modern Energy-from-Waste (EfW – also known as waste-to-energy) facilities around the world. These facilities safely and securely convert approximately 20 million tons of solid waste into more than 9 million megawatt-hours of clean energy each year. Processing more than five percent of the waste in the United States, our facilities provide a sustainable solution to the solid waste disposal needs of more than 20 million people in communities.

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Energy-from-Waste Facility

Covanta Marion, Inc.

Brooks, Oregon

The Marion County Energy-from-Waste facility began commercial operation in March 1987, serving the solid waste management needs of the 300,000 people of Marion County, Oregon. The facility operates as Covanta Marion and processes 550 tons per day of municipal solid waste (MSW), which generates up to 13.1 megawatts of renewable energy sold to Portland General Electric. The facility was the first mass-burn waterwall resource recovery facility combusting MSW in the United States to use dry flue gas scrubbers and fabric filter baghouses to control acid gases and particulates. In addition to MSW, the facility processes about 250 tons-per-month of supplemental waste. It is located in Brooks, a small farming community about four miles north of Salem, the state capital, and 40 miles south of Portland.

Notably, the facility has been a member of Oregon's safety and health recognition program, the Safety and Health Achievement Recognition Program (SHARP) Alliance , since 2006 and an Occupational Health and Safety Association (OSHA) Voluntary Protection Program (VPP) Star member since 2008.

Technical Data

Address:
4850 Brooklake Road, NE
Brooks, OR 97305
(503) 393-0890

Site:
15.2 acres in Brooks, OR

Commercial Operation:
March 1987

Energy-from-Waste System:
Two 275 ton-per-day waterwall furnaces with Martin® reverse-reciprocating grates and ash handling system

Boiler Design:
655 psig/700°F superheater outlet conditions

Air Pollution Control Equipment:
Semi-dry flue gas scrubbers injecting lime, fabric filter baghouses, nitrogen oxide control system, mercury control system, and continuous emissions monitoring system

Rated Refuse Capacity:
550 tons per day

Energy Generation at Rated Capacity:
up to 13.1 megawatts from one condensing steam turbine generator

Sold to:
Portland General Electric Company

Covanta Marion

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Henry, Dora L.

From: North Valley Coalition <nvcabq@gmail.com>
Sent: Monday, September 28, 2015 2:23 PM
To: Henry, Dora L.; Quevedo, Vicente M.; Savina Garcia
Cc: NVC Executive Committee
Subject: Submission from NVC re' Project #1010582, Edith Transfer Station
Attachments: NVC 9-28-15 letter to EPC w-Traffic Review re' Project #1010582.pdf; 08-11-15 Sustainable Systems letter w- Traffic Review.pdf; 08-11-15 WasteXfer Traffic Impacts Aug11 Final.pdf

Good afternoon Ms. Henry, Mr. Quevedo and Ms. Garcia:

Attached please find the following:

9-28-15 Letter from the North Valley Coalition to the EPC
8-11-15 Letter from Sustainable Systems Research, LLC
8-11-15 Review of Traffic Impacts prepared by Sustainable Systems Research, LLC

A hard copy is being hand-delivered to Ms. Henry as well.

These three documents are being submitted for the EPC's consideration and for the record in Project #1010582, the proposed Edith Transfer Station.

We would appreciate your confirming your receipt of these documents.

Thank you.

NVC Executive Committee

-

North Valley Coalition

Visit our website at bit.ly/nvcabqweb

NORTH VALLEY COALITION, INC.

Individuals, Neighborhood Associations, Businesses & Community Groups Working Together

September 28, 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:

Attached to this letter you will find a document entitled "Review of Traffic Impacts from the Proposed Waste Transfer Station in Albuquerque, New Mexico," and dated August 11, 2015, along with a cover letter from the author, which we are submitting for your consideration and for the record in the above-referenced matter. We will also provide an electronic copy to Ms. Henry.

This Review of Traffic Impacts was completed at the request of the North Valley Coalition by Sustainable Systems Research, LLC, with funding from Bernalillo County.

We appreciate your consideration of this document.

Sincerely,

Peggy Norton

Peggy Norton, President
North Valley Coalition

Copy via e-mail to:
Vicente Quevedo, Assigned Staff Planner
Savina Garcia, PE, Wilson & Company

POB 70232, ABQ, NM 87197 • nvcabq@gmail.com • bit.ly/nvcabqweb • 918-0978

Sustainable Systems Research, LLC
27276 Meadowbrook Dr.
Davis, CA 95618
August 11, 2015

To:

North Valley Coalition
Kitty Richards
Kristine Suozzi

As requested, we have completed our review of the Draft Traffic Study and documents related to traffic impacts of the Proposed Edith Waste Transfer Station. We have completed a report examining the potential impacts of the Proposed Waste Transfer Station. In brief, our findings are as follows:

1. **The project-related traffic information that has been presented is inconsistent.** The information that has been presented about the trips generated by the proposed Waste Transfer Station varies, and many of the estimates are not justified or seem to conflict with each other. This makes it difficult to ascertain the traffic-related impacts of the project. In our analysis of trips generated by the project and their potential impacts, we relied on the more detailed project information that has been presented to date.
2. **The Draft Traffic Study relies on a number of faulty assumptions, causing its analysis to underestimate the impacts of the project.** In particular,
    a. Our analysis indicates that the project will likely result in 390 to 732 new trips per weekday; 232 to 254 of these will be truck trips. This range exceeds the projections presented by the City. (See pages 25-26.)
    b. 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. (See pages 14 – 15.)
    c. Convenience center and other household drop-off trips were substantially underestimated in the Draft Traffic Study. (See pages 17 – 21.)
    d. Trips made by collection trucks and vehicles traveling to and from the convenience center are likely to occur on routes that were not considered in the Draft Traffic Study (such as on Griegos Rd west of the project, and on Montano Rd, 2nd St, and 4th St.). (See pages 16-17, 21-22.)
3. **The project has the potential to worsen traffic in the project area.**
    a. On the most heavily impacted corridors, the project will increase vehicle volumes by 3% to 7% and truck volumes by 47% to 151%. (See pages 27-30.)
    b. On corridors that currently exhibit volume-to-capacity ratios greater than 1 during the afternoon peak period, the project will increase peak traffic volumes by up to 6%. (See pages 30, 33-34.)

4. **The project has the potential to reduce safety and bike/pedestrian/transit accommodation on nearby corridors.**
    a. Given that greater traffic volumes, speeds, and truck shares can adversely impact safety there is elevated concern about safety on nearby corridors (particularly on routes carrying vehicles to/from the project and I-25). Safety impacts are of particular concern in areas that already exhibit safety risks, such as Montaño Road & 4th Street and Montaño Road & Edith Blvd. (See pages 35-37.)
    b. In light of the increased traffic volumes (particularly truck volumes), the project's new trips may adversely impact the accommodation of non-auto modes. (See pages 37 – 43.) 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, which 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.
        - Montaño Road, which has a bus line, a Transit Center, and a bike lane with a gap.
5. **The project has the potential to increase noise and air pollution in nearby residential areas.**
    a. In light of the additional vehicle and truck travel on corridors in the project area, the project will increase emissions in the project area. (See pages 43 – 49.) 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.
        - 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, Montaño Road west of 2nd Street, Montaño Road just east of Edith Blvd, and 2nd Street from Candelaria Road to north of Montaño 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.

b. 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 (including Edith Blvd just north of the Griegos Road, Griegos Road just west of Edith Blvd and west of 2nd Street, Montaño Road between 2nd Street and 4th Street, Montaño Road and Edith Blvd, and 2nd Street from Candelaria Road to north of Montaño Road.) (See pages 49-50.) Homes that are of particular concern include:
   - 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, nearby access points will carry approximately one truck every 41 seconds, 600 to 800 feet away.
   - The homes on Edith Blvd just north of Griegos Road, near Montaño Road and Edith Blvd (on Tahoe Place NE), and on 2nd Street north of Montaño Road are also in proximity to weekday truck traffic. During the busiest hour, these corridors will carry approximately one truck every five to six minutes.

6. **We close with a number of recommendations for conducting an improved evaluation of traffic impacts. (See pages 54-55.)**

Note that our 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 in our report but may also be of concern.

Attached please find the full report. Please contact me if you have any questions.

Sincerely,
Dana Rowangould, PhD
Principal
Sustainable Systems Research, LLC

Enclosures:

Technical Memorandum: Review of Traffic Impacts from the Proposed Waste Transfer Station in Albuquerque, New Mexico.

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 Montaño 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

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[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 Montaño 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 Montaño Road) is over capacity and severely congested,

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[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 Montaño Road and Candelaria Road.

- 4th Street (in both directions from Candelaria Road to Griegos Road and northbound to Montaño Road) is over capacity and severely congested,
- Montaño 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.

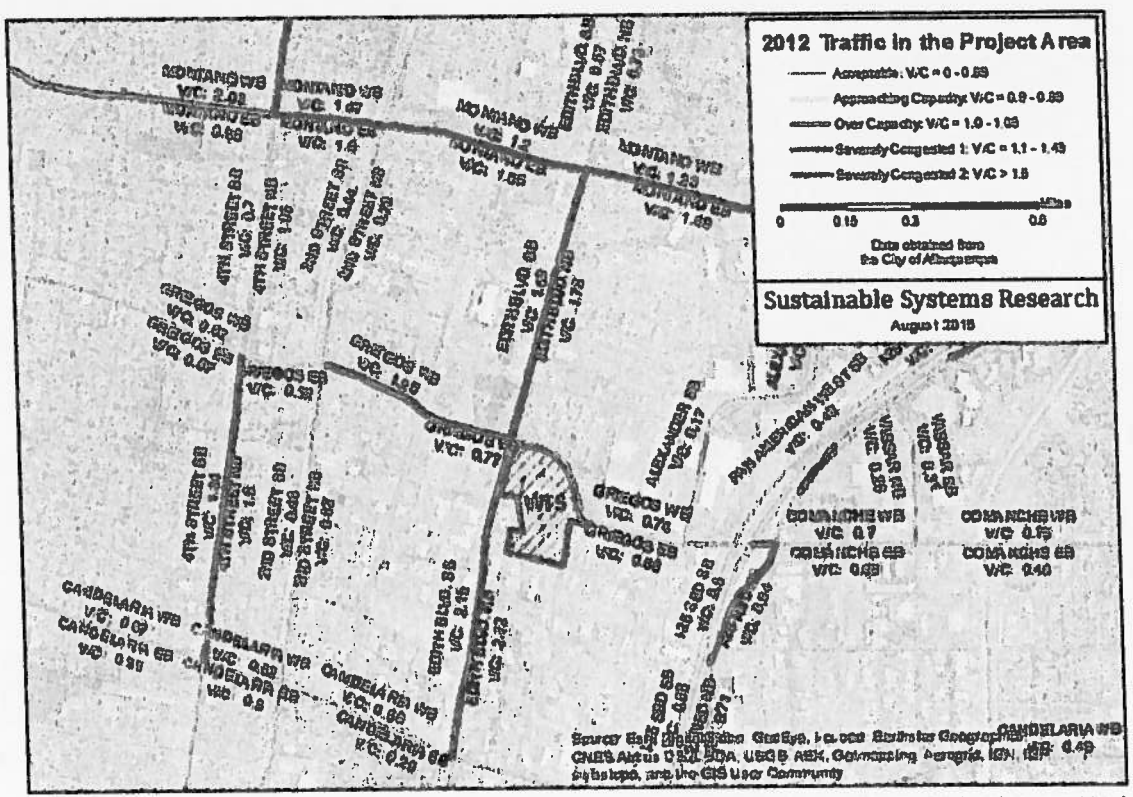

Figure 1: Traffic along roads near the Proposed WTS. Volume to Capacity (V/C) ratios shown reflect 2012 traffic counts and roadway capacities during the afternoon peak period. Roadway data provided by MRCOG. WTS property outline based on city owned property data obtained from the City of Albuquerque.

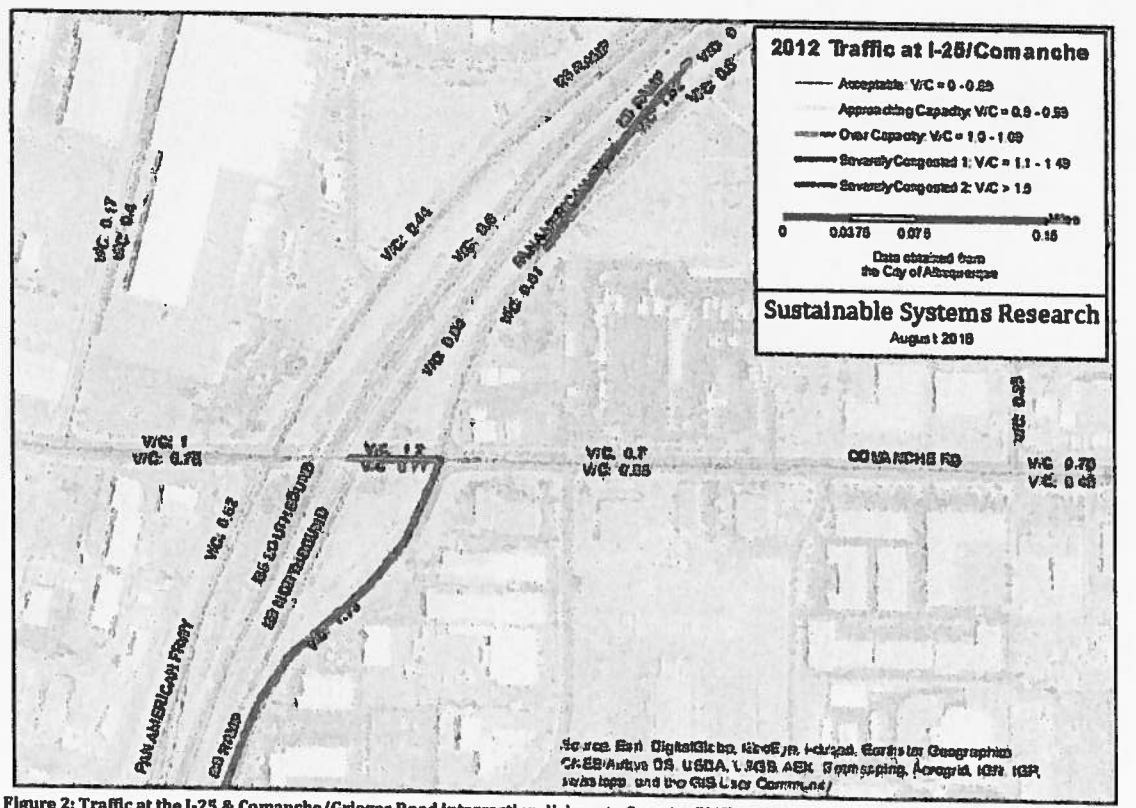

Figure 2: Traffic at the I-25 & Comanche/Griegos Road intersection. Volume to Capacity (V/C) ratios shown reflect 2012 traffic counts and roadway capacities during the afternoon peak period. Roadway data provided by MRCOG. WTS property outline based on city owned property data obtained from the City 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 estimates[9] 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

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[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 Table[13] [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

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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 × (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 × (5 - 1) = 40 new trips plus 10 trucks making 4 loads yield 10 × (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

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[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 impacts[23], 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 Montaño Road.[25]

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[24] At the January 20, 2015 public meeting, the City indicated that Montaño 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/Geocortex/Essentials/geo42/REST/sites/AddressLookup/viewers/Advanced/virtualdirectory/Config/Viewer.xml) indicates that Montaño 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 Montaño 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 maps[26]. 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 Montaño 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 Montaño 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

Montaño 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 Montaño 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 Montaño 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 Montaño 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 weekday[29] 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

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[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

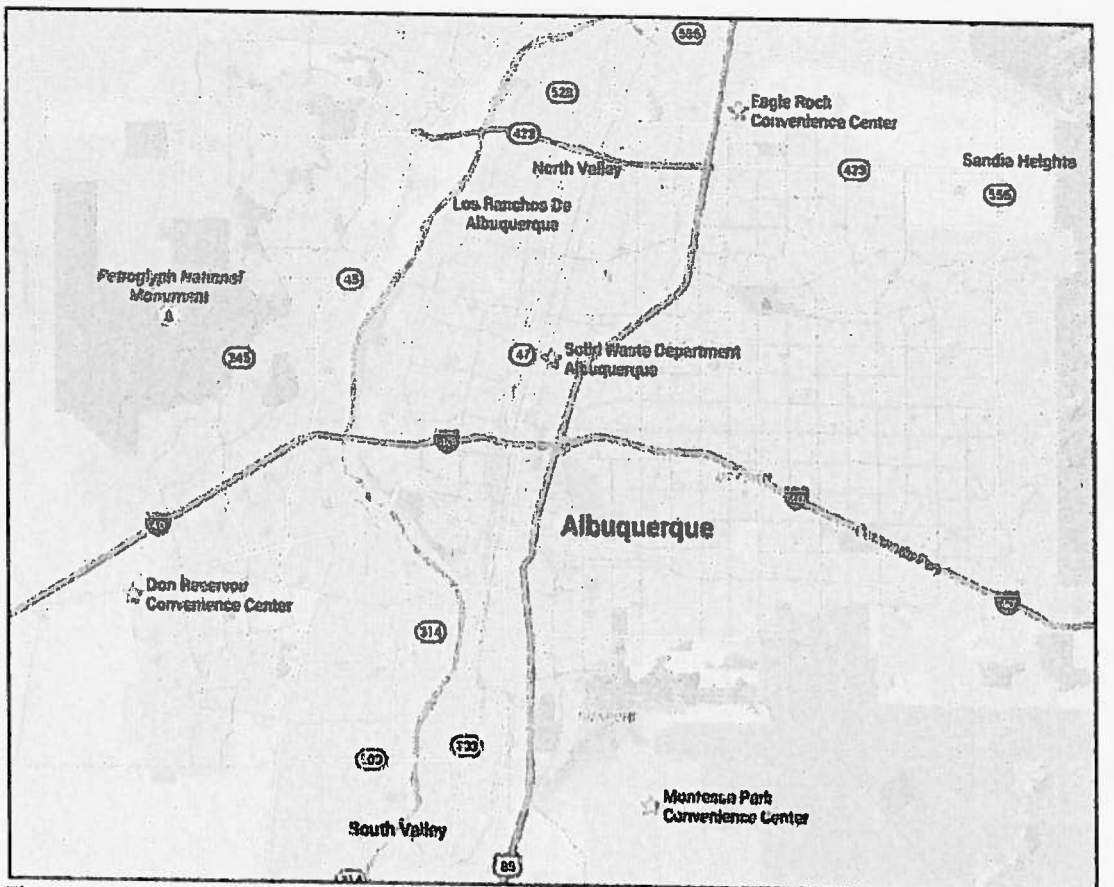

Figure 3: Existing convenience center and current solid waste department (proposed WTS) locations. Map created using Google Maps.

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

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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 closed[32], 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

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[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 unknown[37]. 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 Montaño 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 Montaño Road, we recommend that the traffic study

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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 Montaño 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

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[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%

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[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		
	City	SSR	City	SSR	Comments
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 - 517[48]**	**390 - 732**	**374 - 378**	**528 - 680**	Includes collection trucks, transfer trucks, and residential and private self-haul waste drop-offs.
Trips for City trucks	*190 - 217[49]*	*232 - 254*	*24 - 28*	*33 - 43*	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 weekday[51] 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.

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[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 base[53]	2018 project[54] min	2018 project[54] max	% change[55] min	% change[55] max
Griegos Road / Comanche Road	West of 4th Street	10,756	11,305	13	25	0.1	0.2
	4th Street to 2nd	13,056	13,722	17	42	0.1	0.3
	2nd 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 Montaño Road	15,011	15,777	47	103	0.3	0.7
	North of Montaño Road	14,379	15,112	11	28	0.1	0.2
2nd Street	Candelaria Road to Comanche/Griegos Road	18,989	19,958	9	23	0.0	0.1
	Comanche/Griegos Road to Montaño Road	17,820	18,729	27	78	0.1	0.4
	North of Montaño 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 min	2018 project max	% change min	% change max
4th Street	Candelaria to Comanche/Griegos Road	22,635	23,790	11	23	0.0	0.1
	Comanche / Griegos Road to Montaño Road	23,420	24,615	6	6	0.0	0.0
	North of Montaño Road	15,859	16,668	-	-	0.0	0.0
Montaño Road	West of 4th Street	25,149	26,432	25	76	0.1	0.3
	4th Street to 2nd Street	26,737	28,101	34	85	0.1	0.3
	2nd 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 area[57]. 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 Montaño Road intersections is not accounted for in the five intersections examined in the Draft Traffic Study.

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[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 4th Street	6	6
	4th Street to 2nd	4	4
	2nd 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 Montaño Road	28	46
	North of Montaño Road	4	9
2nd Street	Candelaria Road to Comanche/Griegos Road	4	8
	Comanche/Griegos Road to Montaño Road	4	8
	North of Montaño Road	24	42
4th Street	Candelaria to Comanche/Griegos Road	4	4
	Comanche Griegos Road to Montaño Road	6	6
	North of Montaño Road	0	0
Montaño Road	West of 4th Street	0	0
	4th Street to 2nd Street	8	8
	2nd 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.

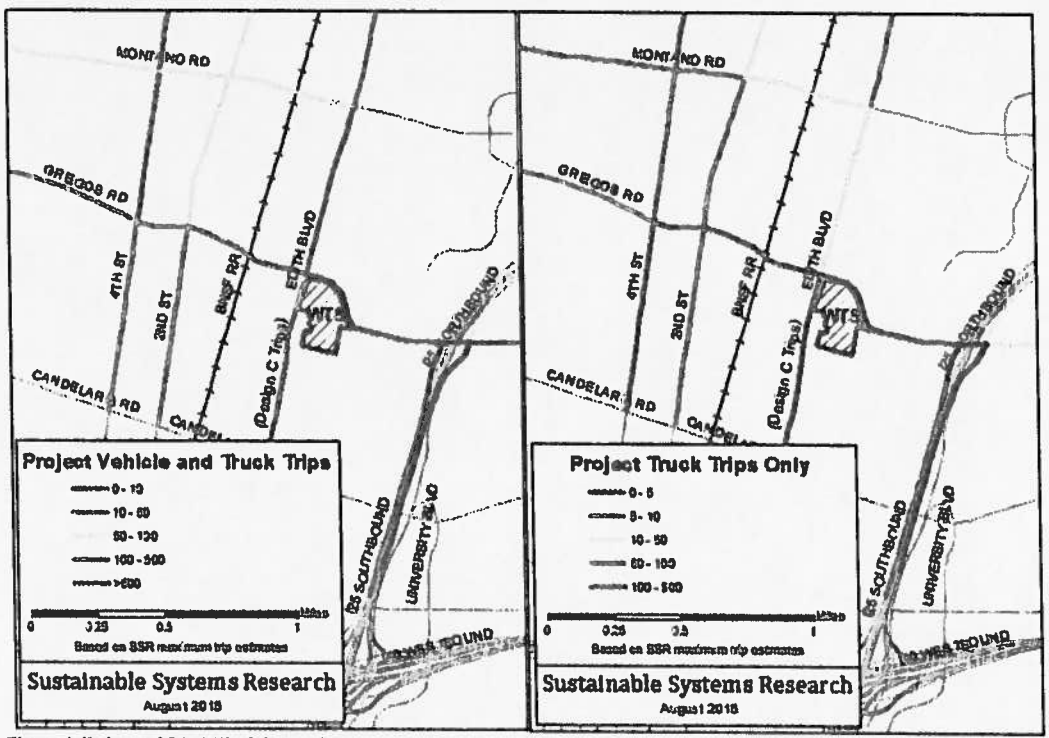

Figure 4: Estimated 2018 Weekday Project Trips. Maximum estimated one-directional trip values from Table 4 and Table 5 are shown. Values shown for each segment represent the greatest traffic levels that may occur on that segment and in some cases they will only occur on part of the road segment. For 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[62] min	% change[62] max	2012	2018 baseline	2018 project min	2018 project 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 (2nd to 4th)	2553	2710	1	4	0.0%	0.2%	1.60	1.69	1.69	1.70
Montaño Road WB (2nd to 4th)	2348	2492	1	4	0.1%	0.2%	1.47	1.56	1.56	1.56
Montaño Road WB (Edith to 2nd)	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).

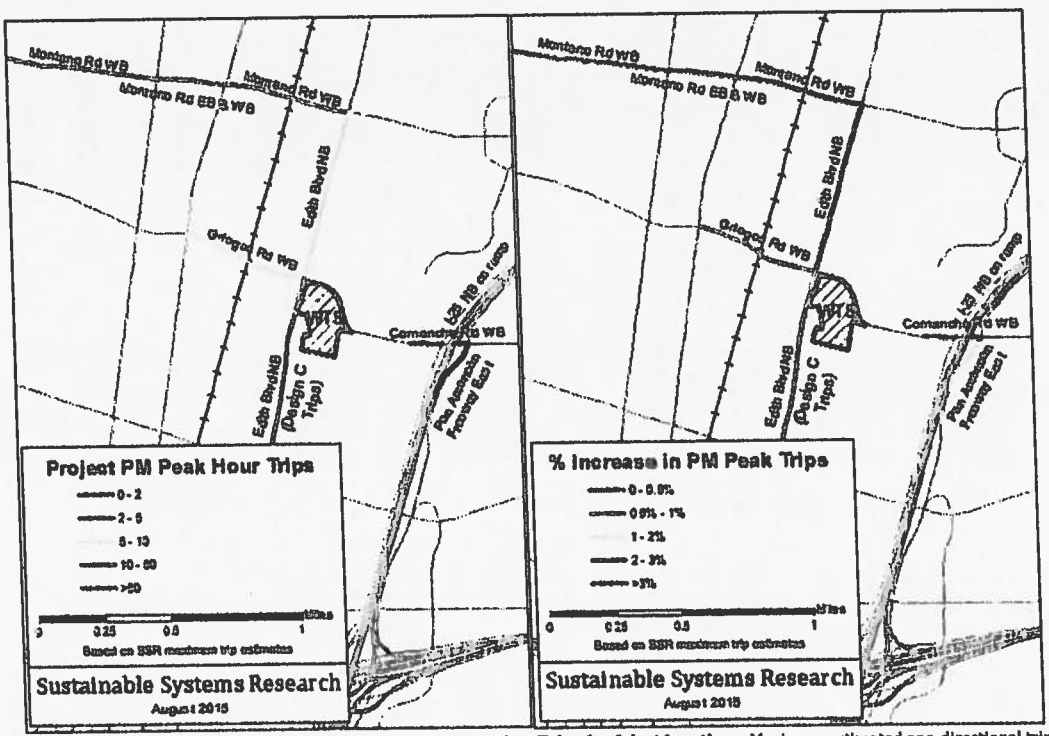

Figure 5: Estimated 2018 Weekday Afternoon Peak Hour Project Trips for Select Locations. Maximum estimated one-directional trip values from Table 6 are shown. Values shown for each segment represent the greatest traffic levels that may occur on that segment and in some cases they will only occur on part 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 2010[64] (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 Montaño Road and 4th Street has been identified as one of the worst intersections in the region in terms of vehicle and bicycle crash rates[65], 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 Montaño 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.

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[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] Montaño 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 collusion 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.

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[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, Montaño 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 Montaño Road, with service along 2nd Street via Griegos Road and Montaño Road), Route 157 (on Montaño Road extending west of 4th Street and east of Edith Blvd), and the Montaño Transit Center (south of Montaño 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 Montaño Road to the City limits to the north).

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

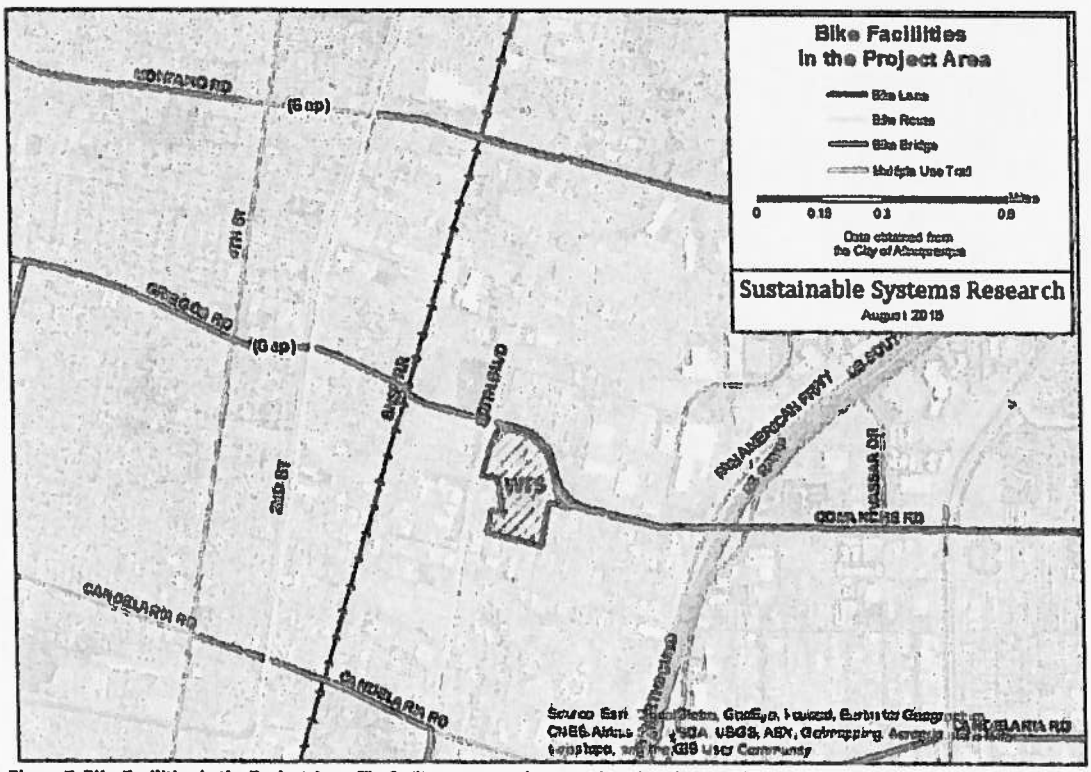

Figure 7: Bike Facilities in the Project Area. The facility segments shown are based on the City of Albuquerque shapefile. The presence of a bike lane shown on Griegos between 5th Street and 1 block east of 2nd Street does not agree with the data sources used in Table 7 and appears to be an error; we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

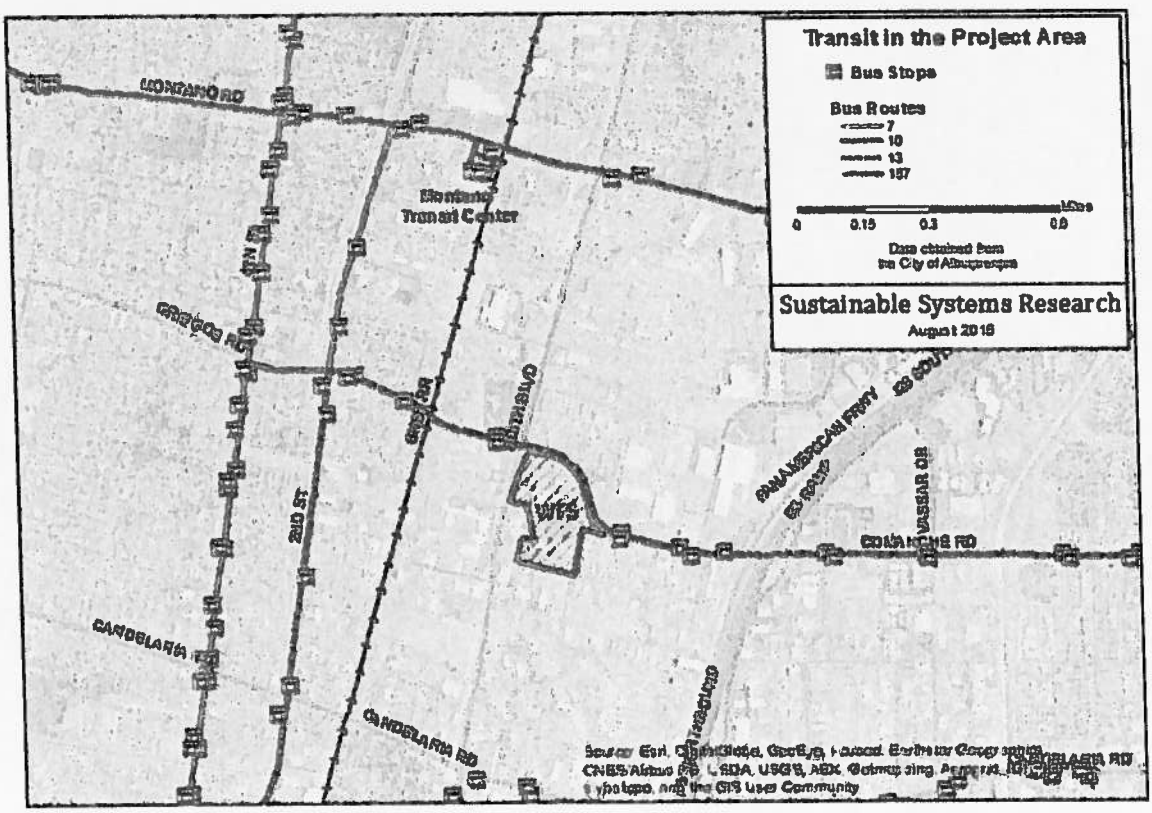

Figure 8: Transit Facilities in the Project Area.

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 4th – E of I-25	Bike lane	Gap: 5th St - 1 block E of 2nd 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 4th – E of I-25	Bike lane	Gap: 5th St - 2nd St	Fill gap. Intersection improvement at 4th & Montaño.	These are "critical link" improvements in BTFP.
2nd 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).

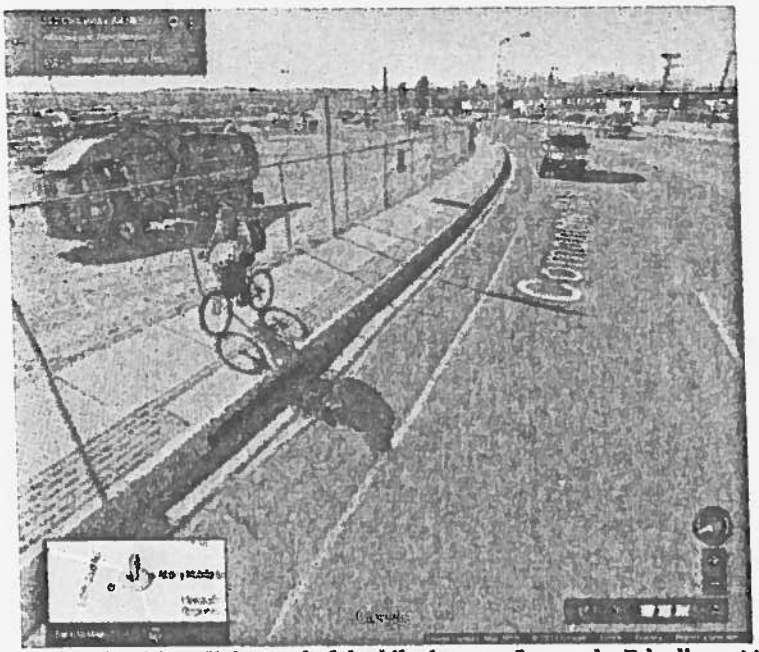

Figure 9: Bicyclist using the sidewalk instead of the bike lane on Comanche Rd adjacent to the site of the proposed WTS. Photograph from Google Maps' StreetView.

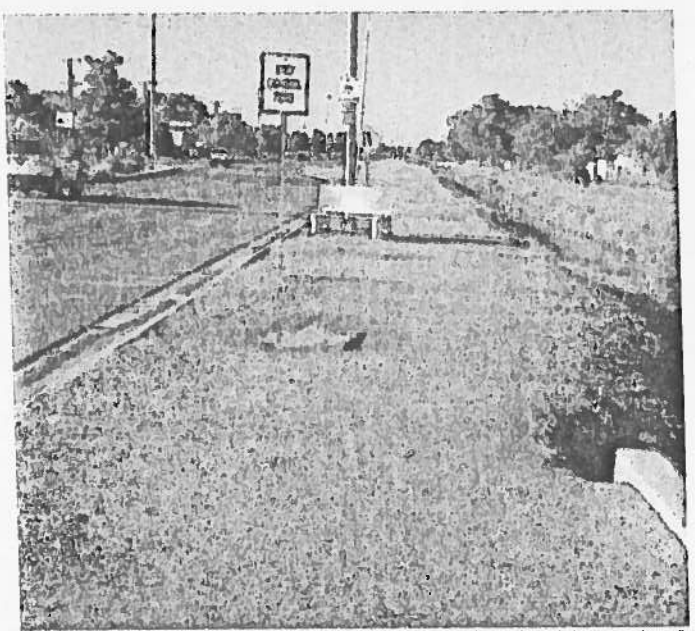

Figure 10: Dirt sidewalk at the southwest corner of Griegos Road and 2nd Street (at the edge of a school zone and at a bus stop).

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 Montaño 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 Montaño Road may also be vulnerable to additional project traffic. Comanche Road, 2nd Street, Griegos Road, 4th Street, and Montaño 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 sources[72], as well as near a number of heavily traveled roads (including I-25, Montaño 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

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[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

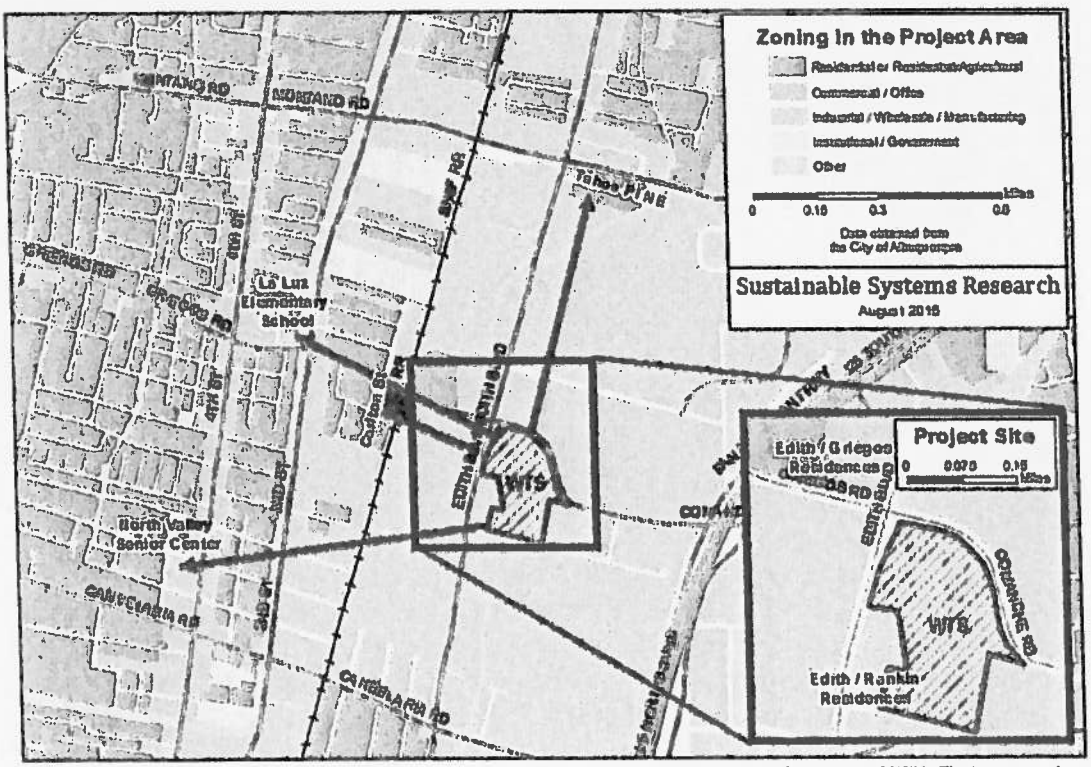

Figure 11: Area zoning and residences, elementary school, and senior center that are nearest to the proposed WTS. The inset map shows the approximate location of the Edith Blvd / Rankin Road residences (located in an industrial zone) and the Edith Blvd / Griegos Road residences (located in a commercial/office 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 NOx 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 (NOx): 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 NOx 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 (PM10[73]) 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 standards[74], while ground level ozone in Bernalillo County is just below current standards and exceeds proposed standards.[75]

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[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/m^3 no more than an average of once per year over a three year period (http://www.epa.gov/airprogm/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/m^3 (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 trucks[78]. 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/airprogm/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 Montaño Road) and I-25 (from Candelaria Road to I-40), on the north by Montaño/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).

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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 PM2.5 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 residences[81], 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, Montaño Road west of 2nd Street, Montaño Road just east of Edith Blvd, and 2nd Street from Candelaria Road to north of Montaño Road (see zoning in Figure 11). Traffic increases along Griegos Road, Montaño 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

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[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, Montaño 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 morning[82]. 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:

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[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, Montaño Road between 2nd Street and 4th Street, Montaño Road and Edith Blvd, and 2nd Street from Candelaria Road to north of Montaño 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 Montaño Road (on Tahoe Place NE), and the homes west of 2nd Street north of Montaño 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 Fridays[83] 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 locations[84].

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[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 & Montaño Road on weekdays and 6 to 8%, 6 to 8%, and 11 to 21% of trips will occur along 2nd Street north of Montaño 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 Montaño Road & 4th Street and Montaño Road & Edith Blvd may be of concern in light of the safety risks that are already present.

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.
- Montaño 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, Montaño Road west of 2nd Street, Montaño Road just east of Edith Blvd, and 2nd Street from Candelaria Road to north of Montaño 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, Montaño Road between 2nd Street and 4th Street, Montaño Road and Edith Blvd, and 2nd Street from Candelaria Road to north of Montaño 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 Montaño Road and Edith Blvd (on Tahoe Place NE), and on 2nd Street north of Montaño 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 Montaño 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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References

1. JRM&A, W.C., CDM Smith,, *Edith Transfer Station Basis of Design Memorandum Programming Phase, Issued March 18, 2015*. 2015. p. 56 pages.
2. Wilson & Company, *Solid Waste Department (SWD) Transfer Station Traffic Impact Analysis Draft Report (Preliminary) June 2014*. 2014. p. 30 pages.
3. J.R. Miller & Associates, *Addendum: Albuquerque Transfer Station Feasibility Analysis, February 2014 Update*. 2014. p. 21 pages.
4. City of Albuquerque. *Existing and New Traffic (dated April 2015)*. 2015 June 14, 2015]; Available from: http://www.abqets.com/wp-content/uploads/2015/01/Existing-and-New-Traffic-.pdf.
5. City of Albuquerque, *Data table provided to Kitty Richards by Jill Holbert and John Soladay in February 2015*. Unknown. p. Summarizes current landfill, Freidman recycling, and SWD facility trip estimates by vehicle type.
6. City of Albuquerque. *Frequently Asked Questions*. Accessed June 5, 2015]; Available from: http://www.abqets.com/faqs/, .
7. J.R. Miller & Associates, *Albuquerque Transfer Station Feasibility Analysis, December 2011*. 2011. p. 41 pages.
8. City of Albuquerque. *ETS - Public Meeting Presentation 7-15-2015*. Accessed on July 19, 2015]; Available from: http://www.abqets.com/wp-content/uploads/2015/04/Edith-Community-Mtg-3-Presentation-07.15.15_Final-small.pdf.
9. City of Albuquerque. *Edith Transfer Station Public Meeting 2 : Site Development Alternatives*. April 21, 2015 Accessed on June 9, 2015]; Available from: http://www.abqets.com/wp-content/uploads/2015/01/Edith-Community-Mtg-Presentation-04.21.15.pdf.
10. City of Albuquerque. *Trash Collection Routes | Edith Transfer Station (maps are dated 2/16/2015)*. Accessed June 9, 2015]; Available from: http://www.abqets.com/about/resources/trash-collection-routes/.
11. City of Albuquerque. *Summary note of questions and answers from Public Meeting held on January 20, 2015*. Accessed on June 9, 2015.]; Available from: http://www.abqets.com/wp-content/uploads/2015/01/Final-Summary-Notes-from-Public-Meeting-1-20-15.pdf.
12. City of Albuquerque. *Presentation Materials | Edith Transfer Station Project*. 2015 [cited Accessed June 3, 2015; Proposed Site Plans from April 21, 2015 Public Meeting]. Available from: http://www.abqets.com/about/resources/presentation-materials/.
13. City of Albuquerque, *Letter to Kyle Silfer, President, North Valley Coalition. Dated 3-30-2015.*, M.J. Riordan, Editor. 2015.
14. Wang, C., M.A. Quddus, and S.G. Ison, *The effect of traffic and road characteristics on road safety: A review and future research direction*. Safety Science, 2013. **57**: p. 264-275.

15. Campbell, B.J., et al., *A Review of Pedestrian Safety Research in the United States and Abroad*. 2004, Federal Highway Administration, US Department of Transportation.
16. Federal Highway Administration, *Synthesis of Safety Research Related to Speed and Speed Management*. 1998, US Department of Transportation.
17. Kim, J.-K., et al., *Bicyclist injury severities in bicycle–motor vehicle accidents.* Accident Analysis & Prevention, 2007. **39**(2): p. 238-251.
18. Rosén, E., H. Stigson, and U. Sander, *Literature review of pedestrian fatality risk as a function of car impact speed.* Accident Analysis & Prevention, 2011. **43**(1): p. 25-33.
19. Chang, L.-Y. and F. Mannering, *Analysis of injury severity and vehicle occupancy in truck- and non-truck-involved accidents.* Accident Analysis & Prevention, 1999. **31**(5): p. 579-592.
20. UNM School of Law. *In Memorium: Tim Vollman*. 2010 Accessed July 26, 2015]; Available from: http://lawschool.unm.edu/news/archives/2010/december/vollmann.php.
21. Mid Region Metropolitan Planning Organization, *Safety Doesn't Happen By Accident: General Crash Data and Trends, 2001-2011 for the Albuquerque Metropolitan Planning Area (AMPA)*.
22. City of Albuquerque, *Bikeways & Trails Facilities Plan, Albuquerque, NM*. 2015.
23. Albuquerque Metropolitan Redevelopment Agency and City of Albuquerque Planning Department, *North Fourth Street Rank III Corridor Plan*. 2010.
24. Academies, T.R.B.o.t.N., *Highway Capacity Manual*. 2010: Washington, D.C.
25. US EPA. *Health | Nitrogen Dioxide | US EPA*. 2014 Accessed March 7, 2015]; Available from: http://www.epa.gov/oaqps001/nitrogenoxides/health.html.
26. US EPA. *Health Effects | Carbon Monoxide | US EPA*. 2014 Accessed March 7, 2015]; Available from: http://www.epa.gov/airquality/carbonmonoxide/health.html.
27. Health Effects Institute Air Toxics Review Panel, *Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects*. 2008: Boston, Massachusetts.
28. USEPA. *Health | Particulate Matter | Air & Radiation | US EPA*. 2014 Accessed March 7, 2015]; Available from: http://www.epa.gov/airquality/particlepollution/health.html. .
29. US EPA, *Health Assessment Document for Diesel Engine Exhaust*, National Center for Environmental Assessment, Editor. 2002: Washington, D.C.
30. US EPA. *Effects | Ground-level Ozone | US EPA*. 2014 Accessed March 7, 2015]; Available from: http://epa.gov/glo/health.html.
31. Rowangould, G.M., *A census of the US near-roadway population: Public health and environmental justice considerations.* Transportation Research Part D: Transport and Environment, 2013. **25**: p. 59-67.
32. Health Effects Institute, *Traffic-Related Air Pollutin: A Critical Review of the Literature on Emissions, Exposure, and Health Effects*. 2010.
33. Karner, A.A., D.S. Eisinger, and D.A. Niemeier, *Near-Roadway Air Quality: Synthesizing the Findings from Real-World Data.* Environmental Science & Technology, 2010. **44**(14): p. 5334-5344.

34. US EPA. *Noise Pollution | Air and Radiation*. 2012 Accessed July 20, 2015]; Available from: http://www.epa.gov/air/noise.html.
35. Federal Highway Administration, *Highway Traffic Noise: Analysis and Abatement Guidance*. 2011, US Department of Transportation.
36. Federal Highway Administration. *Three-Part Approach to Highway Traffic Noise Abatement*. 2012 Accessed July 24, 2015]; Available from: http://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/polguide01.cfm.

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.

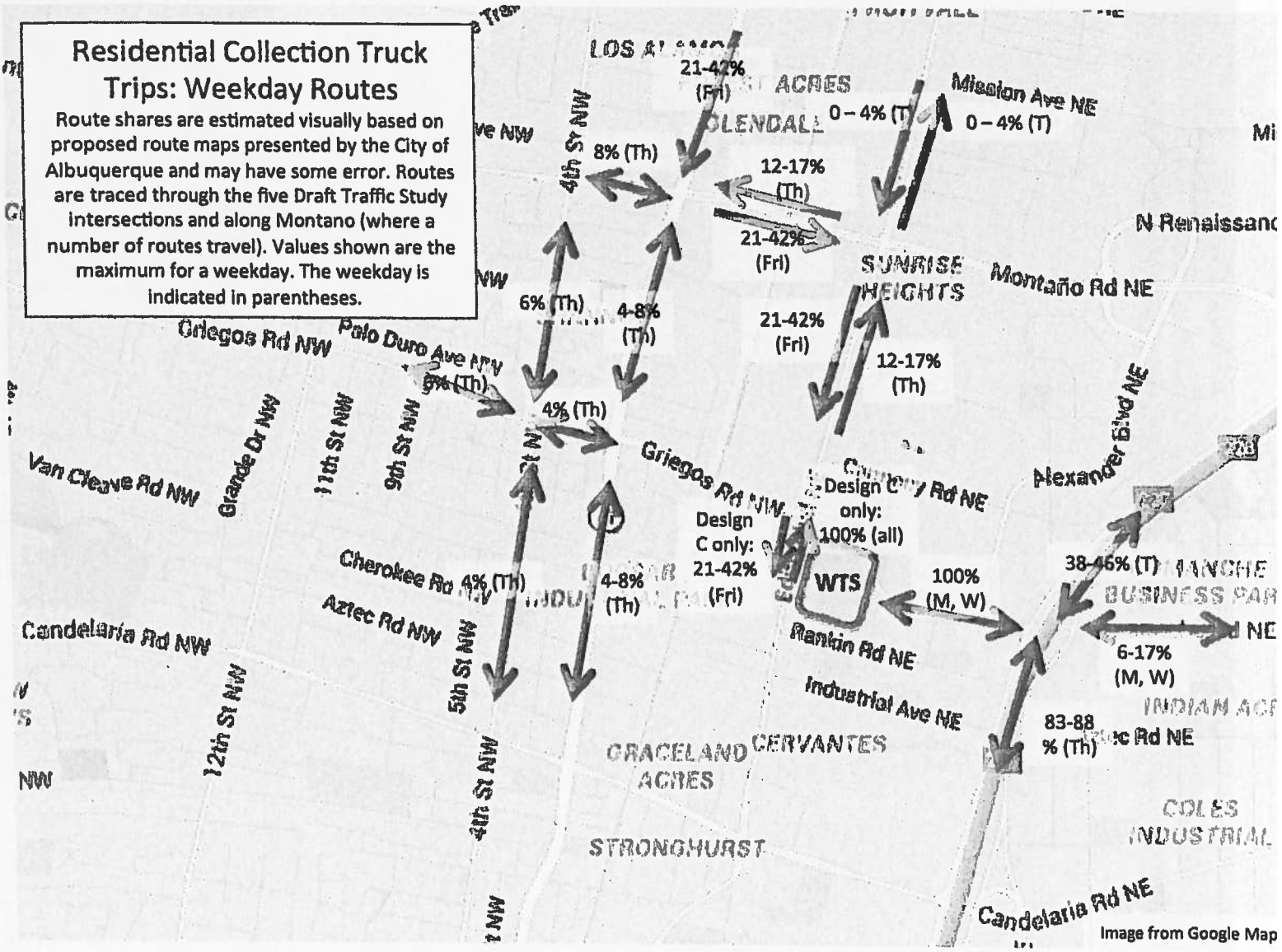
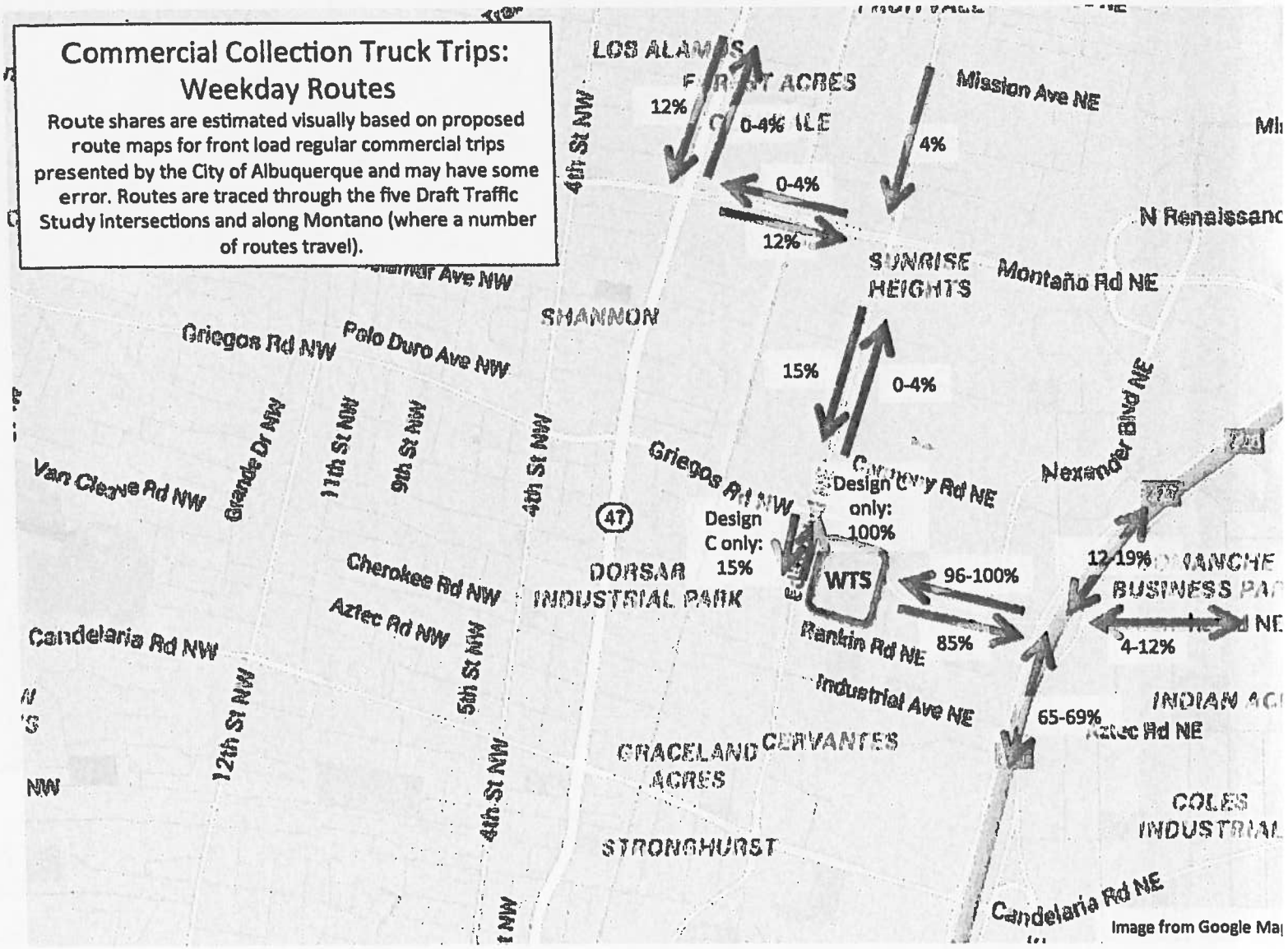
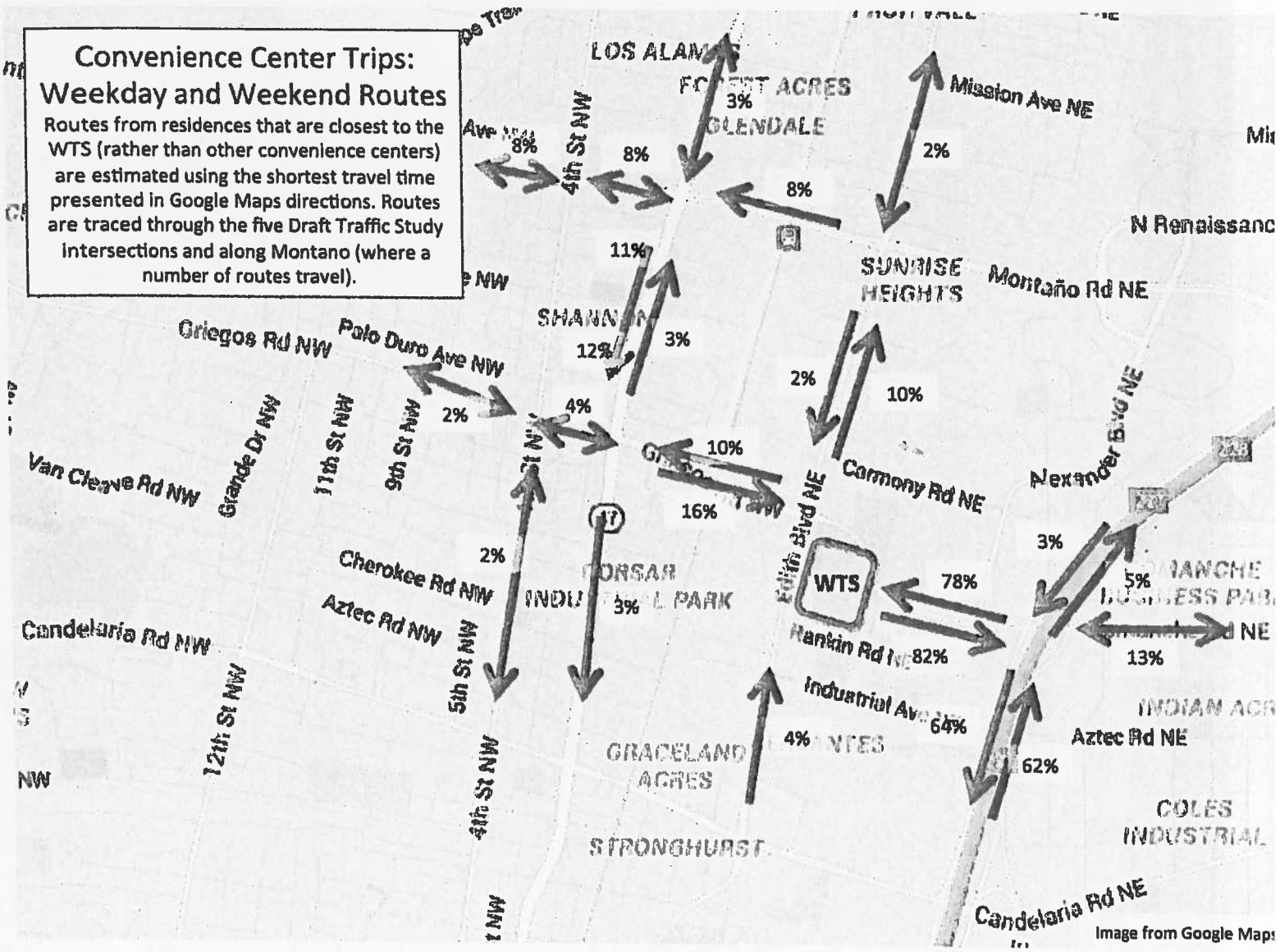


Image from Google Map


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).
LOS ALAMOS
Mission Ave NE
12%
0-4%
4%
0-4%
12%
4th St NW
N Renaissanc
SUNRISE HEIGHTS
Montaño Rd NE
SHANNON
Griegos Rd NW
Polo Duro Ave NW
15%
0-4%
Nexander Blvd NE
Van Cleave Rd NW
Grande Dr NW
11th St NW
9th St NW
4th St NW
Griegos Rd NW
Design only: 100%
Design C only: 15%
47
WTS
96-100%
12-19%
Cherokee Rd NW
DORSAR INDUSTRIAL PARK
Aztec Rd NW
Candelaria Rd NW
Rankin Rd NE
85%
4-12%
Industrial Ave NE
65-69%
Aztec Rd NE
5th St NW
12th St NW
GRACELAND ACRES
CERVANTES
4th St NW
COLES INDUSTRIAL
STRONGHURST
Candelaria Rd NE
Image from Google Ma


Convenience Center Trips:
Weekday and Weekend Routes
Routes from residences that are closest to the WTS (rather than other convenience centers) are estimated using the shortest travel time presented in Google Maps directions. Routes are traced through the five Draft Traffic Study intersections and along Montano (where a number of routes travel).
LOS ALAMOS
FOREST ACRES
GLENDALE
Mission Ave NE
4th St NW
8%
8%
3%
2%
8%
11%
SUNRISE HEIGHTS
Montaño Rd NE
N Renaissanc
SHANNON
Griegos Rd NW
Palo Duro Ave NW
12%
3%
2%
4%
2%
10%
Alexander Blvd NE
Van Cleave Rd NW
Grande Dr NW
11th St NW
9th St NW
10%
Carmony Rd NE
16%
Edith Blvd NE
3%
Cherokee Rd NW
2%
CORSAR
INDUSTRIAL PARK
3%
WTS
78%
5%
Aztec Rd NW
Candelaria Rd NW
Rankin Rd NE
82%
13%
5th St NW
Industrial Ave NE
64%
INDIAN ACR
12th St NW
4%
Aztec Rd NE
GRACELAND ACRES
62%
4th St NW
COLES INDUSTRIAL
STRONGHURST
Candelaria Rd NE
Image from Google Maps

September 22, 2015

TO: Peter Nicholls, Chairman of the Environment Protection Commission
FROM: North Valley Outreach Committee
Loren Kahn, Lori King and Camille Varoz
RE: Opposition to the Proposed COA Waste Transfer Station (WTS)

Dear Mr. Chairman:

The North Valley Outreach Committee ***strongly objects*** to the proposed WTS for the following reasons (Referencing from the Albuquerque/Bernalillo County Comprehensive Plan (A/BCCP) and from the Application for Zone Change COA and Wilson & Co.):

1. **II.C.1.i (A/BCCP)**
   Policy i
   Air Quality Considerations to prevent new air quality/land use conflicts.
2. **II.C.2. 4.-7.**
   Policy c
   Water Quality Contamination resulting from solid waste disposal shall be minimized.
3. **II.B.5.k**
   Policy k
   Land Adjacent to Arterial Streets shall be planned to minimize harmful effects of traffic.

Application for Zone Change: COA and Wilson & Company (Contracted Architecture and Engineering Firm:

They conclude that the application for zone change from M-1 to SU-1 will not compromise air quality, water quality and minimize harmful effects of traffic.

We ***strongly disagree*** with the proposed use from **solid waste recycling to transporting multiple tons of garbage daily** from throughout the Albuquerque metropolitan area. We outline the data below to prove our ***disapproval***:

- 1443 tons of garbage will be dropped off each day.
- 640 City garbage trucks will make 1014 runs per day transferring waste to the WTS.
- 18-wheeler trucks will make at least 65 trips daily to transfer trash.
- 90% of the garbage trucks use diesel fuel which will emit particles of matter polluting the air. (40 carcinogens)
- Increased surface water runoff from operations and increased ground water contamination.
- 173% increase of vehicle use on surface streets and highway exits.

We conclude that the health, air/water quality and traffic impact will have a devastating and harmful effect on over 18,000 residents, students from 9 schools and over 90 businesses in a 2-mile radius of the proposed WTS project. In reality, the entire Albuquerque metropolitan area will be affected as well.

We ***urge*** you to reject the proposed WTS project for the above stated reasons.

Sincerely,

Loren Kahn

Lori King

Camille Varoz

North Valley Outreach Committee,
Loren Kahn, Lori King and Camille Varoz

NOTE: For further questions or information you can contact,
Camille Varoz at camillev0610@gmail.com or at (505) 615-8381.

Quevedo, Vicente M.

From: Laurie Blackwood <somethingsmoving@earthlink.net>
Sent: Monday, September 28, 2015 4:17 PM
To: Quevedo, Vicente M.
Subject: Edith Transfer Station - Project #1010582

Peter Nicholls, Chair
Environmental Planning Commission
% City of Albuquerque Planning Department
600 2nd Street NW, 3rd Floor
Albuquerque, NM 87102

Dear Chairman Nicholls,

I am writing to express my opposition to the proposed site for the Edith Transfer Station.

First of all, why don't we reduce waste altogether? Policy IIC3b: "Encourage solid waste recycling systems which reduce the volume of waste while converting portions of the waste stream to useful products and/or energy".
The City was going to start using smaller trash collection cans, which makes so much sense to me and to many of my neighbors. Why did that not happen? It could still happen, if the City would step up to the plate and encourage the reduction of waste by charging more for picking up more trash. If we do things right, we won't be generating more trash each year and we will not need a new transfer station east of the river.

Policy IIC1k: The Goal is to improve air quality to safeguard public health and enhance quality of life.
Policy K states that citizens shall be protected from toxic air emissions.
Increased air pollution will certainly result from the increase in garbage trucks, recycling trucks, 18-wheelers, and private vehicles coming and going with trash and recycling. This will degrade the quality of life and the health of residents in the impacted neighborhood.

Thanks for considering my concerns.

Sincerely,

Kristine Roy
3827 San Isidro Street NW
Albuquerque, NM 87107

Quevedo, Vicente M.

From: Laura Blackwood <healthartists@icloud.com>
Sent: Monday, September 28, 2015 4:25 PM
To: Quevedo, Vicente M.
Subject: Proposed Edith Transfer Station

Peter Nicholls, Chair
Environmental Planning Commission
% City of Albuquerque Planning Department
600 2nd Street NW, 3rd Floor
Albuquerque, NM 87102

Dear Chairman Nicholls,

I am writing to express my opposition to the proposed site for the Edith Transfer Station.

As a resident of the Los Griegos Neighborhood, I live two miles from the proposed site at Edith and Griegos. My concerns regard traffic congestion, noise pollution, air pollution, highway safety, bicycle/pedestrian safety, reduced property values, health impact, and environmental justice.

Traffic Congestion: I often enter and exit Interstate-25 at Comanche. Two weeks ago, Saturday September 12th, at about 1:57pm, my partner and I witnessed a very dangerous driving incident by a blue trash/recycling truck. We were second in line at a red light in the far-left-turn lane of Comanche (heading East), waiting to turn left to go North on the frontage road for I-25. The traffic moving East and West had green lights. The left turn arrow (to turn North) was red. It applied to both left-turn lanes. Suddenly, a trash/recycling truck zoomed (very fast, without any pause) by us in the other left-turn lane (to our right) and turned left (North) directly through the red arrow! It was really shocking! So dangerous! Luckily, there was a break in the West-bound Comanche traffic, so no accident occurred. When vehicles are heading downhill Westbound on Comanche, they temporarily become invisible (due to a large dip in the hill) to the Eastbound traffic. I am concerned that any increase in heavy truck traffic through this intersection will result in serious traffic accidents.

Highway Safety: The increased burden of heavy trucks entering and exiting I-25 at this already congested area seems like trouble to me. It is already a very congested area. Heavy trucks entering and exiting increase the likelihood of accidents in highway merging lanes.

Noise Pollution: II.C.4 The Goal is to protect the public health and welfare and enhance the quality of life by reducing noise and by preventing new land use/noise conflicts. Increased noise pollution from the increase in garbage trucks, recycling trucks, 18-wheelers, and private vehicles coming and going with trash and recycling.

Air Pollution: II.C.1.k The Goal is to improve air quality to safeguard public health and enhance quality of life.
Policy K states that citizens shall be protected from toxic air emissions.
Increased air pollution will certainly result from the increase in garbage trucks, recycling trucks, 18-wheelers, and private vehicles coming and going with trash and recycling. This will negatively impact the health of nearby residents, business owners, employees, students, and people in the nearby juvenile detention center.

Bicycle/pedestrian Safety: II.D.4.g Isn't Griegos a bike path? Where will bicyclists be diverted to? The greening of our city requires increased accessibility and increased safety for bicyclists and pedestrians.

Reduced Property Values: II.C.9, II.C.9.a Do waste transfer stations help to maintain or increase property values? Or do they cause nearby home values to drop? It seems to me that this neighborhood is a place where residents come to live in a quiet historic area close to downtown. I do not see how this facility will improve the character or home values of this neighborhood.

Environmental Justice: The most impacted neighborhood has a low income minority population that is already challenged in terms of health and quality of life by the industrial activity in the neighborhood. I am deeply concerned that the proposed Edith Transfer Station increase the cumulative burden of environmental pollutants and stress on the neighborhood residents.
One of the primary goals of the EPC is to improve quality of life within neighborhoods. Why not turn this area into a park with trees that would give life and fresh air back to the community?

Thank you for considering the health and wellbeing of the community.

Sincerely,

Laurie Blackwood
3827 San Isidro Street, NW
Albuquerque, NM 87107

9-24-15

Mr Nichols, Chair E.P.C.
#1010582

We own the property and business closest to the proposed WTS at 4600 Edith. All of the trucks will come in and out beside and behind us. It could be 1000 or more a day. The noise and smell will be terrible for our business. As the city grows there will be more trucks needed.

The traffic is heavy now. Peak hours are 5am-9pm. Many times businessowers can not get in or out. Edith design makes our customers who use trailors to bring cars and boats stop traffic to pull in.

We can only hope the City's new design for flood control is better than their present one. Someone failed to realize that water does not drain up.

We fear our property value will fall greatly. No one could run a business here without ear protection.

The city people keep telling the area business and residents how beautiful the place will be and I'm sure it will. They want to be good neighbors but they have not been until this early summer. We worry about the future.

People dump anything and well all over the area if the convience center is closed. It garbage blows and is a fire hazard. The owners are to pick up their garbage on our property.

So we object strongly to a zone change.

Marian Panioni
4404 Edith NE
87107

• semi haulers
• garbage truck

7 rental Homes

444 Edith

EDITH BLVD.

ALAMEDA LATERAL

ALAMEDA LATERAL

RANKIN RD.

COMANCHE RD.

COMANCHE LN.

SITE CIRCULATION

Edith Transfer Static

City of Albuque

Department of Municipal Develop

Solid Waste Management Departm

VICINITY MAP

LEGEND

Transfer Trucks

Collection Trucks

Employee / Visitors

Public Self Haul

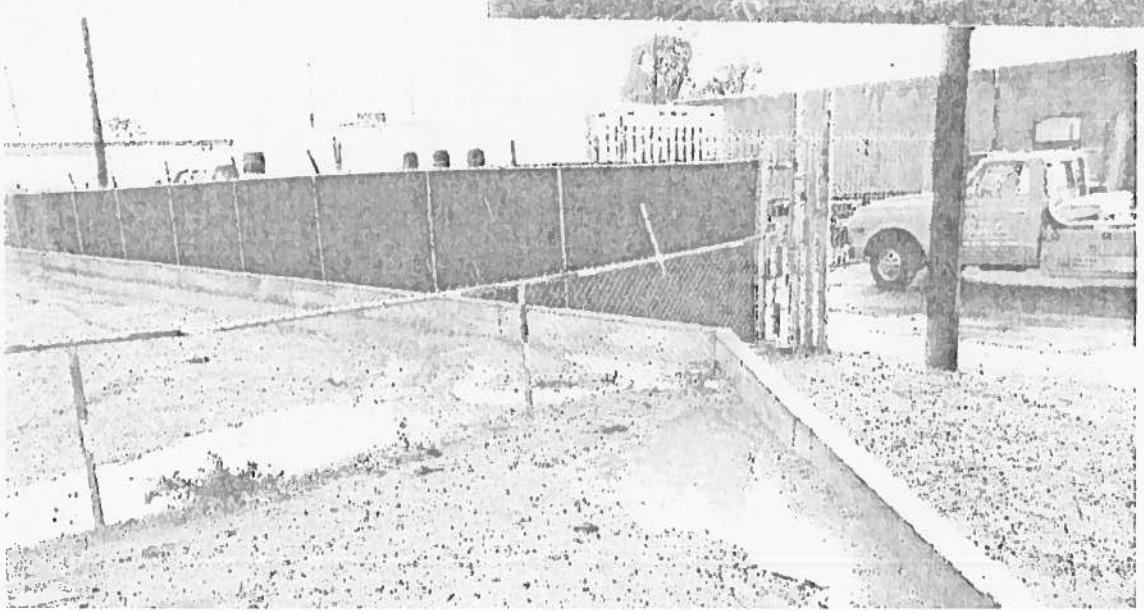
Public Access / H.H.W. / Recycle Dro

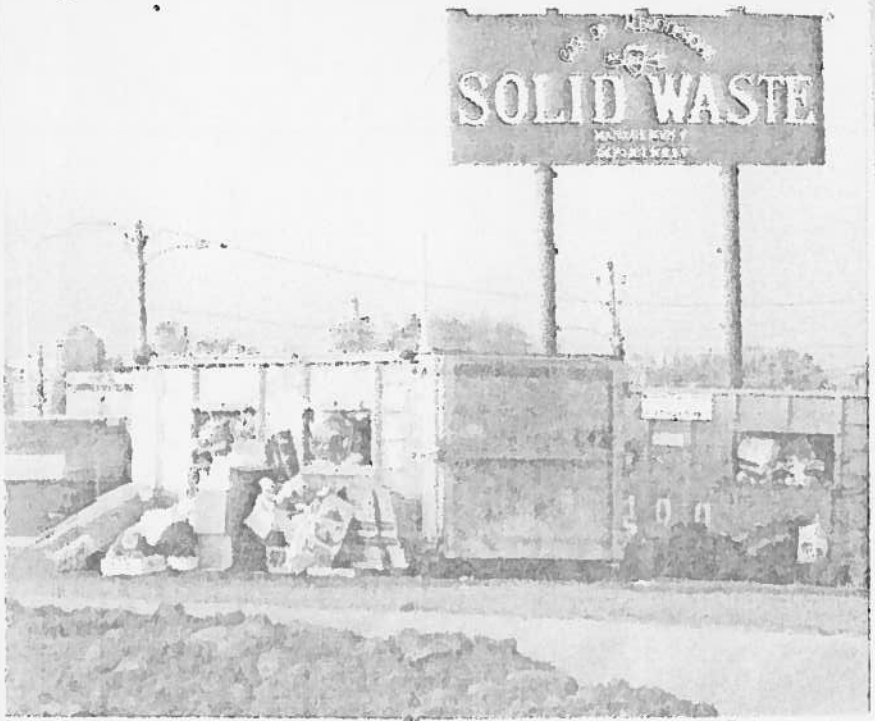
SITE CIRCULATION

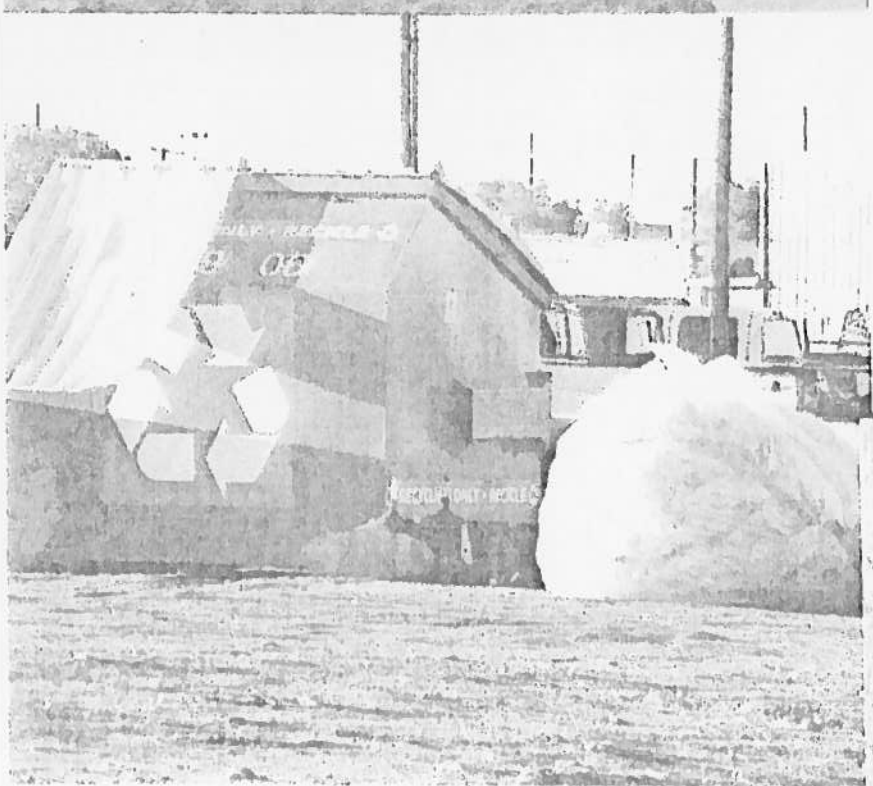
August 27, 201

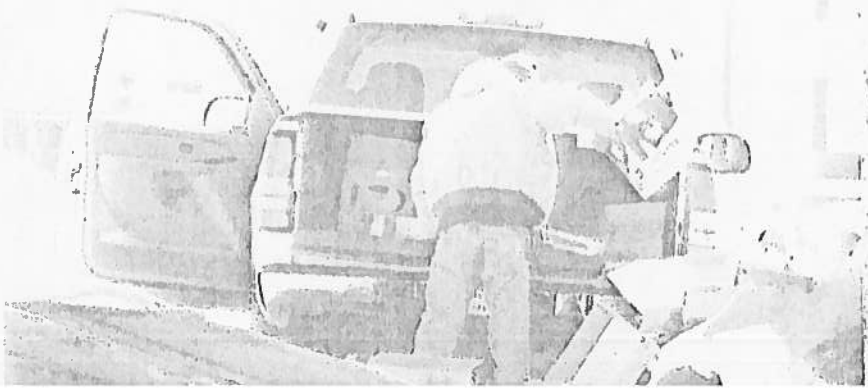
SHEET No. S

COA PROJECT No. 7005.82 JRMA No. 49




SOLID WASTE





September 27, 2015

Peter Nicholls, Chairman
Environmental Planning Commission
c/o Planning Department
600 Second St. NW
Albuquerque, NM 87102

Dear Mr. Nicholls,

Please add my voice (once again) as strongly opposed to the construction of the Edith Transfer Station in my neighborhood here in Albuquerque.

I cited many reasons for my opposition in previous letters (sent in January and March) to City Councilors, and the "appropriate" City and Wilson company contacts provided at that time. Later I was informed that the process was over, that the City had voted to proceed. Now I understand that the waste transfer project violates Albuquerque's own Comprehensive Plan and the traffic analysis was based on invalid and "faulty" information.

Traffic has always been one of my primary concerns, as our local streets (like Griegos and Fourth) were never intended for the heavy trucks already ruining our infrastructure. This project involves bringing ALL the City's huge garbage trucks down our narrow, already congested streets. As I stated previously, I've lived in my home for 25 years and previous plans that were to keep commercial traffic on 2nd or Montano never work. Traffic has constantly increased on Fourth and Griegos to the point we can barely access our own homes!

I've also learned that a required zoning change (to proceed with this project) is still pending! This was not revealed previously. In fact we (area residents) were led to believe that that the process of hearings and zoning changes were done, so many of us had simply given up on voicing our continued opposition.

Many other residents, the North Valley Coalition and State Senator Bill O'Neill have provided in depth details about misleading and erroneous information used to proceed with the project. I ask that you take a serious look at all the information submitted and consider that we have been repeatedly duped with sketchy information and sometimes outright LIES about the status of this project that will essentially "finish off" our neighborhood and lifestyle.

Sincerely,

Jamelle Morgan

613 San Lorenzo Ave. NW, Albuquerque, NM 87107

LETTER TO MR. NICHOLLS, CHAIR EPC 9/21/2015

Mr. Nicholls, I object to a zone change from M1 to Special Use at 4600 Edith Blvd. NE for building a Waste Transfer Station. It would be a detriment to the North Valley. It would also be a huge waste of money for the City of Albuquerque. The WTS is old technology of "bury the waste". We cannot continue to make and bury our garbage at the rate we do now.

The city claims that this WTS will be "State of the Art", "Improved aesthetics to showcase their stewardship"," and will save the city $2.8 million a year". However, at their estimate of $38.8 million in 2015 it will take over 14 years to offset construction costs alone. The city has never built anything that came in under budget. The norm for city construction will be over budget by the time that extra costs for change orders etc. comes in. So it will take well over 14 years to recoup their investment. By 2029 this facility will be obsolete.

The City of Albuquerque should be researching and building a Waste to Energy Plant with the more than $38.8 million they have budgeted for this project. And the $2.8 million a year savings would grow exponentially.

As a North Valley resident these are the reasons I strongly oppose the Zone Change request.

Sincerely, Kasey M. Pavioni

6134 4th St. NW Apt. 26

Los Ranchos, Albuquerque, NM 87107

9/22/15

CONWAY ELECTRIC

September 15, 2015

Mr. Peter D Nicholls, Chair
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

RE: ZONE MAPE AMENDMENT: Proposed Edith Transfer Station
EPC Project #1010582

Dear Chairman Nicholls:

My name is Guy Conway. My residence is at 3021 Casa Del Norte NE.

I own and operate Conway Electric, at 567C Comanche Ln NE.

My business is less than 100 ft. from the Solid Waste Department (SWD) located at 4600 Edith Blvd. NE.

I oppose the zone change from M-1 to Special Use.

The Written Project Summary, was submitted to the EPC on August 27th 2015, by Wilson & Company. I Would like to bring the Commission's attention to perhaps the biggest untruth that I have seen, since this project came to my attention.

Page 1 of the Written Project Summary, states: "the proposed use of the site would remain very similar to its current use...."

The proposed use of this facility will be to bring in daily, tons and tons of garbage into a new facility, as well as have private vehicles with their unsecured loads also bringing trash there.

The proposed use and primary use, are the only reason for the zone change. The other existing elements to not require zone change.

To represent to your Commission that its use is a similar to its current use, is disingenuous at best, and a deliberate attempt to mislead the Commission at worst.

After being in business at my location for many years, my experience with the Solid Waste Department is they are not in any way concerned about their business neighbors, or how the operations affect their neighbors. This zone change would have a destabilization effect on the M-1 and M-2 zones. I have seen no justification that the transfer station and convenience station would be desirable for the area and even the surrounding neighborhoods.

I would ask that the Commission deny this zone change request.

Thank You,
Guy Conway
Guy Conway

567 C Comanche NE Phone (505) 344-6096

9/24/15

Chairman Peter Nicholls, Environmental Planning Commission,
c/o City of Albuquerque Planning Department, 600 2nd Street NW, 3rd Floor,
Albuquerque, NM, 87102

Chairman Nicholls,

Re: Proposed Edith Transfer Station (ETS), Project #1010582
I strongly object to a zoning change and to the proposed ETS, to be located in the middle of Albuquerque, at Comanche and Edith. My three main concerns (among many) are:

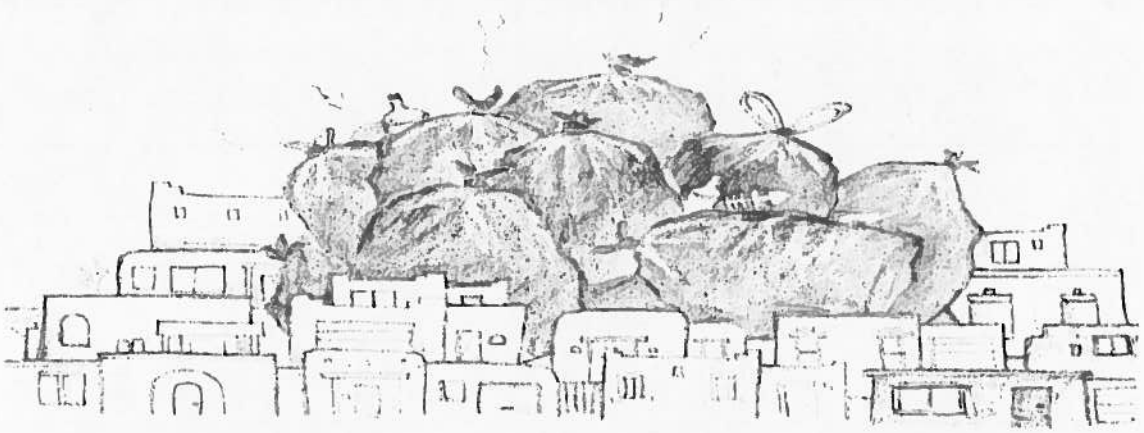
1. The traffic on I-25: The entrance from Comanche to go south on I-25 is already difficult at rush hour and during heavy traffic days. Two lanes (which diverge to I-40) have to be crossed in order to go south. This is already dangerous and difficult. There is no plan to remodel the Big I interchange, even with the projected traffic increase of 173%, predominately trucks.

2. The potential risk of having just one big transfer station for the entire city, in the event of a natural disaster, technological malfunction, labor strike, etc: Why not make several smaller transfer stations, which can back each other up in the event of the unexpected. WHY put one giant garbage transfer station in the **middle** of the city?

3. OUTDATED! There is no consideration of any new technology to manage and convert urban waste into energy. Albuquerque does not even have a compacter to reduce what's put into the landfill! We can and should do better than this, with taxpayer money.

Sincerely,

Isabelle Kessler
4913 Guadalupe Trail NW, Albuquerque, NM 87107-3369



City Hall's Proposal for Albuquerque's Quality of Life

Loren Kahn
4913 Guadalupe Trail NW
Albuquerque, NM 87107
505-344-2186

Peter Nicholls, Chairman
Environmental Planning Commission
600 2nd Street NW, 3rd Floor
Albuquerque, NM 87102

September 24, 2015

Re: Edith Transfer Station, Case #1010582

Dear Chairman Nicholls,

I am a resident of the North Valley, vehemently opposed to the proposed map amendment necessary to construct the Edith Transfer Station (ETS). The concept of one sole Waste Transfer Station in the middle of our city is ill conceived, duplicitous and outdated.

According to COA Zoning Code, Appendix B: Enactment 270-1980, the proposed zone change "should be consistent with the health, safety, morals, and general welfare of the City."

Contrary to this Zoning Code Enactment, the proposed waste transfer station will negatively impact the quality of life of the entire city as well as the immediate neighborhood. Traffic will increase by 173% at the already congested Comanche/I-25 entrance and on the freeway. Air and noise pollution will impact an already overburdened neighborhood, with NINE schools and a Little League Facility within the breathing area.

There have been no forward thinking proposals about new environmental technologies to manage garbage, just mention of old methods that are wasteful and polluting.

The community was never consulted, just "informed," **after** a site decision had been made.

It is strikingly apparent that the ONLY consideration for this proposed project is cost savings. Does quality of life mean profit? NO! It means the well-being of citizens. Shame on the City of Albuquerque for ignoring the impact of this proposed fiasco and seeing only dollar signs.

I hope your Commission will vote to **deny** the zone map amendment request made by the City of Albuquerque and return some dignity to the process.

Sincerely,

Loren Kahn

Loren Kahn, Citizen
505-344-2186

4935 Guadalupe Trl. NW
Albuquerque, NM 87107
9/24/2015

Peter Nicholls, chairman
Environmental Planning Commission
% the Planning Department
600 Second St. NW
Albuquerque, NM 87102

Mr Nicholls,

I have been a citizen of New Mexico for 77 years. Many times I have been disappointed in local government, but the present proposed transfer station takes the cake.

Citizen participation would have been appropriate before granting a lucrative contract to a design firm to place a single massive transfer station in the center of a city, interrupting the regular neighborhoods, schools and businesses.

An intelligent approach would have been (and still could be) to divide the city into perhaps four areas and handle the transfer stations on the outskirts of the population.

I cannot believe that anyone on the city planning department has taken the time to exit the north bound freeway onto the west comanche street during even moderate traffic (it is a dangerous nightmare).

I do so hope that your commission will show the good sense to respect the present zoning and encourage the city to devote the property to a positive addition to the neighborhood.

Hopefully yours,

Janet L. Jenkins

Janet L. Jenkins

September 22, 2015

Peter Nicholls, Chairman
Environmental Planning Commission
c/o Planning Department
600 Second St. NW
Albuquerque, NM 87102

Dear Mr. Nicholls,

I heartily agree: The City's proposed Waste Transfer Station at Edith and Griegos DOES NOT BELONG there or in any other neighborhood whether upscale, middle class or low income. Albuquerque has historic neighborhoods, the Griegos area being one of them.

According to the Albuquerque /Bernalillo County Comprehensive Plan,

II.C.9 The Goal is to preserve and enhance the natural and built characteristics, social, cultural and historical features that identify Albuquerque and Bernalillo County sub-areas as distinct communities and collections of neighborhoods,

this Transfer Station will not preserve nor enhance this historic community. I have taken classes about the history of this area that goes back to the 18th and 19th centuries showing its contribution to the integrity of the cultural character of Albuquerque. Ed Boles and Mo Palmer can attest to this.

Let alone blowing trash escaping from garbage trucks, this Waste Transfer Station will be a huge traffic burden on this community. It will also create a continuous loud racket from the hundreds of trucks roaring in and out of the narrow streets in this area. And then there's the loss of property values to the residents and businesses as well. Who would want to purchase a home in this area for their family?

A Waste Transfer Station, if in fact you even need one, must be in a location away from residential communities, perhaps in a big industrial area like South Broadway near Coronado Wrecking and Salvage Company. It might even be an improvement to this area.

THINK: Would you want this Transfer Station in your back yard?

Sincerely,

Sondra Diepen
Member North Edith Corridor Neighborhood Asso.
124 Marlowe Lane, NE
Albuquerque NM 87113

New Mexico State Senate

State Capitol
Santa Fe

COMMITTEES:

VICE CHAIR:
·Public Affairs

MEMBER:
·Education

SENATOR BILL B. O'NEILL
D-Bernalillo-13

343 Sarah Lane, NW - Apt. D
Albuquerque, NM 87114

Cell: (505) 450-9263
E-Mail: oneillsd13@billoneillfornm.com

September 23, 2015

Peter Nicholls, Chair
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

RE: Zone Map Amendment: Proposed Edith Transfer Station

Dear Chairman Nicholls:

I would like to voice my strong opposition to the proposed map amendment necessary to construct the Edith Transfer Station.

As the State Senator representing this area of Edith and Comanche, I am very concerned about the impact on the surrounding residential neighborhoods of a 24-hour continuous onslaught of garbage trucks that this change would mean to the families in the immediate area (I would also point out that there is a newly constructed North Valley Little League facility just across the street).

I am also frankly offended at the "process" for community input that the city presented: instead of starting with the question of whether or not the Edith Transfer Station was a good idea, the city launched into this "choose between several options" approach, as if it had already been decided that this was going to happen.

In addition, the feasibility studies done in 2006, 2011 and 2014 centered exclusively on cost savings for the City of Albuquerque. It is clear that costs are the *only* consideration for this proposed project, and certainly not the impact on the lives of the residents of this part of Albuquerque.

I hope that your Commission will vote to *deny* the zone map amendment request made by the applicant, The City of Albuquerque.

Sincerely,

Bill O'Neill

Bill B. O'Neill
State Senator

cc: Karen Hudson
Moises Gonzalez
Victor Beserra
Derek Bohannon
Maia Mullen
James Peck
Bill McCoy III

Mr. Peter D. Nicholls
Chair Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, N.M. 87103

Re: Proposed Garbage Collection Center
at Edith and Comanche

Dear Mr. Nicholls:

I am writing today to express my concerns and opposition to the proposed Garbage Collection Center at Edith and Comanche. The primary reasons for my opposition to this facility at this location are:

1.) Increased toxic immissions from the additional 1,014 garbage truck runs coming to this location, versus the land fill, to dump 1,443 tons of garbage.

2.) Increased traffic and noise, seven days a week, at or around the site that is already a busy traffic area, parti-clearly on Comanche.

3.) The potential for pollution to the area ground water and to the water currently passing through the drainage ditch west of the property along Edith.

4.) The potential harm to air quality to local residents, employees and staff of local businesses, juveniles and staff

at the Detention Center south of the property and to players and their families at the new Little League baseball facility south and west of the property.

5.) All of the waste and contaminated material will be in a designated flood plain.

The primary motive that is driving this decision by The City is the fuel savings it will realize from their garbage trucks no longer taking their loads to the landfill west of town.

Respectfully submitted:

Jeff B. Newland

Jeff B. Newland
3515 Campbell Farm Lane
Albuquerque, NM 87104

4620 5th NW
Albuq. NM
87107
505-344-6376
c) 505 417-4882

Peter Nicholis, Chairman
Environmental Planning Commission
Planning Dept.
600 2nd St.
Albuq. NM
87102

Sir:

I oppose the proposed transfer station's location in a residential area — Griegos and 2nd.

I am particularly concerned about the following:

This is my #1 Concern → 1) Any increase in traffic (inconvenience and <u>air pollution</u>) My daughter has asthma,

2) Private vehicles headed to the dumping area (unsecured loads) I already deal w/ blowing trash from local stores)

3) Large truck traffic (causes cracks in the walls of my old adobe)

4) lower real estate value of my home.

Please consider neighborhood concerns!

Thank you, [illegible] H McSalem

Mr Nicholls, Chair EPA

This is a policy I do not believe the city is following

10	II-94	II-D-5-C #1, #2	The displacement of low income households, shal be ameliorated & the objectives of historic preservation & conservation of affordable housing balanced. #1 Monitor the effects of home improvement & preservation programs on nearby land costs, property values & rents, & conversion to on-residential uses. #2 Establish strategies to minimize displacement of low income people from affordable housing by: 1) identifying funding to assist individuals & families whose homelessness has been caused by displacement; & 2) coordinating the work of local government agencies.

#1 When the city people attending the meeting were asked about land values around a WTS. They stated values would go up.

However property owner do not agree. A commercial realtor came to the meeting and sited several cases where land & building values decreased close to garbage sites, convence centers and transfer centers.

One city employee said to sell a property when the WTS is built and let him know if the value went up or down.

#2 There is no evidence of a study of historic properties has been considered or done. There are at least three very close. Two are in the NW corner of Edith and Cornwalle.

Marian Pavioni

12	II-98	II-D-6-D #3	Tourism shall be promoted. #3 Manage development & change to retain & enhance unique features which give this area its identity.

To Mr Nicholls, Chair EPA

The valley of Albuquerque is a valuable asset to the city. It is unique and draws many tourists to drive Route 66; come to Balloon Fiesta, to walk along the river, go to the Nature Center.

The tourists travel Comanche and Edith; so do the balloonists and Chase Crews. They will all be competing with the WTS trucks on this dangerous corridor.

The WTS will promote disaster not tourism. The unique features of the valley are being ignored. The valley will not be enhanced by a zone change. The valley has an identity which is being endangered.

Marian Lavioni
4013 Tulane Dr NE
Alb. NM 87107

13	II-98	II-D-6-F #3,#4	The City & the County should remove obstacles to sound growth management & economic development throughout the community. #3 Target economic incentive programs to promote equitable economic development condition throughout the community. #4 Develop strategies to correct problems of disinvestment.

To Mr Nicholls, Chair EPA

Increased traffic volume and size of collection and transfer trucks for garbage will make access to the roadways more difficult and dangerous. The present traffic from the businesses in the area (over 250 in a one mile radius) often ties up the intersections (longer when the train goes by.)

Many business owners are renters and will simply leave if the zone change is allowed and the WTS is built. No one else will want to rent. This is a huge obstacle to the economy and property owners. There is no incentive for a business to come to an area of constant heavy traffic.

The present renters and owners have traffic problems. This will be compounded with (130) semi + pups in and out; 200 garbage trucks making 5 trips a day (1200); the employees coming and going (600).

No strategies are in place or planned to correct these problems of disinvestment to the businesses or property owners.

M. Pavini 4013 Leland NE Alb. NM 87107

1010582

To Mr Peter Nicholls, Chair EPH

9	II-93 ??	II-D-5-A #3	The Goal is to increase the supply of affordable housing; conserve & improve the quality of housing; ameliorate the problems of homelessness, overcrowding, & displacement of low income residents; & assure against discrimination in the provision of housing. #3 Institute strategies to minimize the displacement of low income people from affordable housing.

The noise and odor from the garbage trucks parked less than 100 feet (not 1300 as stated by the city) might displace the residents of seven low income houses at the corner of Rankin Road and Edith.

A wall as on the freeway might help but not a fence and a few trees.

The city has no concern for the residents at this location and has not contacted them. The city has failed on II.D.5.A #3.

Marian Pavioni
4404 Julane Dr N.E.
Albuquerque, NM
87107

P.O. Box 6715
Albuquerque, N.M.
87197-6715

9-21-15

Dear Mr. Peter Nichols and the
Environmental Planning Commission,

I write to express my views against the proposed trash transfer station on Edith.

There will be harmful effects for those in the immediate area on Edith & Comanche due to increased traffic with "larger tractor-trailers" in an area that is a hazard to drive now.

Neighborhoods near the site will be compromised with increased traffic, larger trucks, exposure to toxic materials, and increased use and lines of people waiting to dump their extra trash. What will be the impact on nearby schools & students walking to school? What about air quality and the impact of noise on citizens nearby?

I am a home owner just off of 4th St. N.W. I have lived in this area for 23 years. This modest area is not one where people speak up for their rights.

I believe we need to follow the example of Sandoval county which

houses its trash transfer station out of the city limits where huge lines of trucks and cars wait for their turn to unload their trash. I have seen this.

Thank you for considering my letter.

I am a retired, Bilingual, APS Elementary school teacher. The issues of non-English speakers and undocumented people in neighborhoods near the proposed trash transfer station need to be addressed. A portion of people in nearby neighborhoods have no background in the process of receiving city information or how to even begin to respond to the city.

Sincerely,
Judy Giblin

CBS CHIMNEY SWEEPERS
P.O Box 6982
Albuquerque, NM 87197-6982
505-884-8666

Mr. Peter D. Nicholls, Chair
Environmental Planning Commision
City of Albuquerque
PO Box 1293
Albuquerque, NM 87103

Sepember 17, 2015

Re: Zone Map Amendment: Proposed Edith Transfer Station
EPC Project # 1010582

Dear Chairman Nicholls,

My name is Gilbert Gonzales and I own and operate CBS Quality Lawn Care at 600-C Comanche Ln NE. My location is near the Solid Waste Department located at 4600 Edith NE. I oppose the zoning change being requested from M-1 to special use for the Solid Waste Property. I see no benefit for the area to be inundated with tons and tons of garbage brought to an already overburdened area. There are already two polluters less than a ¼ mile from the Solid Waste yards that require oversight from the Air Quality division. The added pollution that this change will bring will endanger the health of myself and my neighboring businesses. I ask the commission to consider the comments and feedback from residents and businesses that are closest to this project and realize it will be detrimental to health, safety, and living conditions for this area.

I ask the Commission to not approve this zone change request

Thank You

Gilbert Gonzales

Fleet Maintenance
620 Rankin Rd NE
Albuquerque, NM 87107
505-344-3036

Mr. Peter D. Nicholls, Chair
Environmental Planning Commision
City of Albuquerque
PO Box 1293
Albuquerque, NM 87103

September 17, 2015

Re: Zone Map Amendment: Proposed Edith Transfer Station
EPC Project # 1010582

Dear Chairman Nicholls,

My name is Dennis Harp and I own and operate Fleet Maintenance at 620 Rankin Rd NE. My business is less than 100ft from the Solid Waste Department located at 4600 Edith NE. I am writing to inform you that I oppose the zoning change from M-1 to special use for the Solid Waste Location. The written project summary that was submitted to the EPC on August 27th by Wilson and Company is misrepresents to the commission that the new use is similar to the current use. The summary states, " The proposed use of the site would remain very similar to its current use..." However the proposed use will bring in daily, tons and tons of garbage into the new facility as well as private vehicles with their unsecured loads bringing trash in.

I feel that this zone change would be detrimental on all the surrounding properties including residences and businesses. I have seen no justification for this change and this project

I ask the Commission to deny this zone change request.

Thank You,

Dennis Harp

Peter Nicholls, Chairman EPC

I oppose the zone change from M-1 to Special Use by the city for a Waste Transfer Station at 4600 Edith N.E. I own the property and business next door. Site plan C was chosen by the city and now they have moved the driveway to be used by trucks 75 feet closer to my property, only 15-18 feet from my office and lot.

The noise from crashing glass into recycle containers north of the present drive location is at numerous times excessive and makes conducting business difficult . The constant noise from the trucks will make conducting business in or out of my office or on the phone virtually impossible.

Most of my customers use trailers to bring boats and cars to my business. Getting in or out due to the street redesign (construction in 2008-2010) and the heavy traffic is difficult . It will be extremely difficult if not impossible with the zone change and trucks the WTS will be using.

The off ramp from I 25 to Comanche is often at a standstill due to semi traffic trying to access the truck stop at Menaul and the many local business trucks in this area. West under the freeway on Comanche only a very few vehicles can sit for the light to change, three semis at most can sit between those two lights. When the trains go by traffic can back up east to the freeway.Semi trucks with a "pup" will back up traffic quicker and longer.

I have seen the traffic many times stopped in all directions. There is a minimum of 200 businesses within a one mile radius of the proposed WTS. The traffic consists of cars, but mostly, semi and work trucks. It is very congested throughout the day. Obviously, the impact with the zone change will create much worse and dangerous streets and intersections.

I oppose the zone change for my business and for the safety of the public and other businesses in my area.

Larry Stepp Owner of American Marine & Stepp's Custom

TOVA INDRITZ
524 GRIEGOS ROAD, N.W.
ALBUQUERQUE, NEW MEXICO 87107

September 21, 2015

Peter Nicholls, Chair
Environmental Planning Commission
c/o The Planning Department
600 Second Street, NW
Albuquerque, NM 87102

by fax only: 924-3339

RE: proposed garbage transfer station at Edith and Griegos Roads, NW

Dear Mr. Nicholls:

I write to oppose the location of a single garbage transfer station at Edith and Griegos Roads, NW for the entire City of Albuquerque's solid waste.

The idea of this garbage transfer station was presented to the neighborhood at a meeting as a "fait accompli" and the community was only asked for input regarding the design. But the more fundamental question is whether there should be a single such garbage transfer station for the whole city, or whether it would be better from both an efficiency point of view and an environmental point of view to have multiple smaller stations spread throughout the city, perhaps a half dozen or so, so each garbage collection truck would have a shorter distance to travel from its collection points to the transfer station. On this question, there has been no input from the community. For that reason alone, the plan should be denied at this point.

Second, we are a poorer and minority section of town in this part of the near North Valley. The idea of siting an environmental hazard in a poor, minority part of the City is repugnant, with its increase in traffic and noise, reduced air quality, reduced ground water quality, and numerous other negative impacts.

As you know, a group of concerned citizens have been working with health professionals Kristine Suozzi and Kitty Richards to prepare a Health Impact Assessment of the proposed Edith Transfer Station in the near North Valley. This report, which has been in preparation for nearly a full year, draws several alarming conclusions, including:

----the Waste Transfer Station (WTS) will contribute to existing health disparities among Hispanics and sensitive populations, and to poorer health among all population groups living in the impacted neighborhoods;

---the WTS does not provide for the health, safety and welfare of residents living in adjacent neighborhoods as required by (City of Albuquerque Zoning Code) Enactment 270-1980;

---the City of Albuquerque has failed to consider health impacts that might harm residents living in neighborhoods close to the site;

---the City of Albuquerque has failed to provide a cost-benefit analysis comparing the proposed site with alternative sites;

---the proposed site for the WTS follows a disturbing historical trend that many of today's municipalities are attempting to reverse—the siting of WTSs in low-income and minority communities.

For these and other reasons specified in the report, the Health Impact Assessment Committee "recommends denial of the City of Albuquerque's request for a zone change to Special Use and recommends that the City of Albuquerque evaluate alternative sites that are more protective of human health."

I support the findings of that Health Impact Assessment, and ask that the project be denied for reasons set forth in their full report which the North Valley Coalition is furnishing to the EPC.

Sincerely,

Tova Indritz

Tova Indritz

Collins Engine-Generator Service, Inc.

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

Date: 9-15-15
Reference: M-1 Special Use
Address: 4310 Edith NE Alb, NM 871097

To Whom It May Concern,

The purpose of this letter is object to a zone change from M-1 to special use at 4600 Edith NE for building a waste transfer station. It would be harmful to the adjacent business, properties, the neighborhood and the valley community.

Thank you,

Steve Collins
President/Owner
505-269-1968

Quevedo, Vicente M.

From: THERESAHANRETTA3392 <theresahanretta3392@comcast.net>
Sent: Monday, September 28, 2015 2:37 PM
To: Quevedo, Vicente M.
Subject: Re: Proposed Edith Transfer Station Project #1010582

September 28, 2015

Peter Nicholls, Chair
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87107

Re: Proposed Edith Transfer Station Project #1010582

Dear Commissioner Nicholls:

I own a home approximately one mile west of the proposed transfer station. I am a retired senior citizen with grave concerns about the proposed zoning change that would allow the City of Albuquerque to proceed building a Waste Transfer Station and Hazardous Waste Convenience Center in my immediate neighborhood that also includes two elementary schools, a softball park, and bike trails. This community has already accommodated a Recycling Center, cement processing plant, and Holly Asphalt -- all of which have impacted to various degrees on the well being and health of our community. The addition of the Transfer Station would only bring substantially more traffic, noise, air pollution, potential waste water contamination, vermin, health and safety issues, to an already overburdened residential community. The certain possibility of decreased property values would be devastating to me since my home is my only insurance against a financial catastrophe. I have many neighbors who share that same anxiety. Who would want to purchase a home one mile from a Waste Transfer Station and Hazardous Waste facility?

It is absolutely shameful that the City would want to proceed with this project in spite of the enormous opposition from neighborhood citizens who were never even consulted until after the site had been selected. It would be a grave injustice if the City was allowed to proceed with a project that is clearly not in the best interests of the citizens who will be most directly affected.

Respectfully,
Theresa Hanretta
4449 Jupiter Street NW

Quevedo, Vicente M.

From: Daniel P Waldman <DPWaldman@salud.unm.edu>
Sent: Friday, September 18, 2015 11:06 AM
To: Quevedo, Vicente M.
Subject: Edith Transfer Station special use permit and zone change

Importance: High

Dear Mr. Nichols and the Environmental Planning Commission, I am writing about the potential special use and zone change being requested for the development of the Edith Transfer Station.

As a physician I spend a lot of time thinking about the existing and potential harms that our communities face. After all, despite all the impressive bells and whistles of modern medicine, medical care only accounts for about 20% of the health of a population. The rest is outside physician control. The single largest contributors to our health are our social and physical environments.

What's it worth for a fellow citizen to avoid a chronic illness? How should a community weigh the health impact of a sizable increase in diesel exhaust fumes in comparison with a city's tax savings? These are the questions we need to be grappling with as the city moves forward with plans to locate a major Transfer Station in an area with 18,000 residents and 9 public schools. This is a process that requires rezoning, which by definition should not be granted in situations with potential to harm local populations.

As you know, moving significant quantities of trash around will require a large increase in large truck traffic- with a resultant increase in diesel exhaust. Taking just one potential harm: what do we know about the potential health effects of exhaust fumes? The science is developing and we're learning more all the time. Many studies for example have shown a significant association between diesel exhaust and lung cancer rates. The World Health Organization recently classified diesel emissions as a known carcinogen. The harms of poor air quality aren't limited to lung cancer: a study found that a population of women had increased heart attacks, strokes, and deaths directly related to their exposure to pollution. Other studies show that living close to major roads is associated with wheezing and asthma in children. Air pollution levels have been correlated with days lost from work. Exposure to air pollution was even found to be linked to gestational diabetes, a disease with worsening prevalence in New Mexico. The more we look, the more we find.

Precautionary measures should be taken when an activity raises threats of harm to human health. According to the "precautionary principle," the proponent of the activity, rather than the public, should bear the burden of proof. In other words it shouldn't be up to citizens to make the definitive case that there will be harm from the Edith Transfer Station, it should be up to those interested in development to definitively prove it will be safe.
While not surprising, it is absolutely shameful that the community who would bear the health burden is 64.6% Hispanic, with 35.6% of the families living below the federal poverty line. The area is more Hispanic and poorer than Bernalillo County as a whole. Minorities and the poor are already understood to have worse health outcomes in New Mexico. Simply put: *the proposed development would not have gotten this far if the affected community was wealthier and had more time and disposable income to devote to fighting* it.

Would the transfer station save money? That's more complicated than tax dollars saved on fuel and vehicle maintenance: we'd need better statistical and healthcare cost-modeling than currently exists. Likely the transfer station wouldn't be so much a cost savings for taxpayers as it would be a cost shift: some people would get sicker- and chronic illness is extremely expensive.

A truism of medicine is that preventing disease is more cost effective than paying for treatment: an ounce of prevention is worth a pound of cure. We should resist the creation of an in-city transfer station, and thus not move forward with the rezoning process.

If I can provide any references about the health effects of diesel exhaust, please don't hesitate to contact me.

Thanks for your time,
-Dan Waldman, MD

Family Medicine Residency Program Director
Department of Family and Community Medicine
UNM Health Sciences Center

MALOY
MOBILE STORAGE
535 Comanche Rd., NE, Albuquerque, NM 87107
Phone 505.344.6123 Fax 505.344.3351
www.maloystorage.com

September 28, 2015

Mr. Peter Nicholls
Chairman
Environmental Planning Commission
City of Albuquerque Planning Department
600 2nd Street NW, 3rd Floor
Albuquerque NM, 87102

via email: dhenry@cabq.gov & vquevedo@cabq.gov

Re: Edith Solid Waste Transfer Station Proposal
Project# 1010582

Dear Mr. Nicholls:

We are the owners of Maloy Mobile Storage, Inc., located at 535 Comanche Road NE. We strongly oppose and have serious concerns about the proposed Edith Solid Waste Transfer Station being designed for the 22-acre City property at the southeast corner of Edith and Griegos/Comanche.

A competent traffic flow and pattern study would readily demonstrate that Comanche Road cannot handle the substantially increased traffic that will occur if the proposed solid waste transfer station is located at the proposed site. The north and south Highway I-25 access and exit ramps that feed from and onto Comanche Road will not be able to handle the substantially increased traffic from the city garbage trucks, let alone the ancillary traffic visiting the transfer station. The City representatives have stated the garbage trucks would not be on those roads during peak traffic hours, which is frankly an irrelevant argument. The Highway I-25 access and exit ramps and Comanche Road cannot adequately and safely handle *the current* traffic at any time of day. The increased traffic due to the general public using the transfer station throughout the day will be a major safety and ingress/egress problem for the businesses in the surrounding area, including ours.

The traffic pattern in front of our business on Comanche Road is currently so heavy that the drivers of our trucks and semi trailers and our employees can hardly pull out onto Comanche in a safe manner and the traffic sometimes backs up to Comanche and I-25. There is a substantial curve on Comanche between I-25 and Edith which has been part of the dangerous situation we already face with heavy traffic. It is literally a dangerous race to squeeze into the fast traffic pattern going both ways. Additional traffic due to the waste transfer station will substantially and adversely impact our business and livelihood. Cars and trucks travel at a high speed westbound on Comanche, and accidents happen frequently and have become ever more severe as time has gone on.

The increased traffic from a waste transfer station will cause potential deadly collisions.

Our business, Maloy Mobile Storage, has dealt with trash blowing over from the current city garbage yard for the last fifteen years that we have been located at 535 Comanche. We have frequently and

repeatedly called to complain, but have consistently been given the run around and put on hold for 20 minutes at a time. Despite numerous left messages, no manager or City employee ever calls back. The City representatives have stated they had no idea we had any trouble. The truth is they have stuck their heads in the sand and have not dealt with it. We have been forced to clean up the mess ourselves for years. If a solid waste transfer station is built in this location the trash mess will be much worse than it is now.

Although indoors, the waste transfer station will stink up the neighborhood and make it a bad place to do business. Our property value will decline with a solid waste transfer station located across the street from our property. It is a known fact that the land we own will be worth much less once the solid waste transfer station is built, which has been confirmed by several commercial real estate brokers.

A Mega solid waste transfer station should not be built in the middle of an already congested area within the city. It will devalue the neighborhood and businesses in the area.

The proposed solid waste transfer station at Edith and Griegos/Comanche will bring increased traffic, litter, smell, and devalued property values to the businesses and neighbors in the area. Do not build a solid waste transfer station in this location. There may be a need for an additional waste transfer station, but not in the middle of the city at Edith and Griegos/Comanche.

Regards,

Pat and Mary Beth Maloy

Cc: North Valley Coalition via email: nvcabq@gmail.com

State of New Mexico
House of Representatives
Santa Fé

DEBORAH A. ARMSTRONG
D - Bernalillo
District 17

2015 Dietz Place NW
Albuquerque, NM 87107
Home Phone: (505) 795-5164
E-mail: deborah.armstrong@nmlegis.gov

COMMITTEES:
Enrolling & Engrossing - A
Health
Regulatory & Public Affairs

September 25, 2015

Mr. Peter D. Nicholls, Chair
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

RE: ZONE MAP AMENDMENT: Proposed Edith Transfer Station
EPC Project # 1010582

Dear Chairman Nicholls:

I write to oppose the proposed zone map amendment necessary to construct the Edith Transfer Station. I request that my letter be entered into the official record.

As a member of the NM Legislative Health & Human Services Committee, as well being involved with public health issues for years, I have deep concerns about the health outcomes, and increased health risks to this already overburdened area of my District.

I have seen no justification from the City of Albuquerque that the health and safety of the workers and public have in any way been studied. The City has failed to show why this change should be made. It appears that costs benefits are the only factor driving this zone change request.

The *"Health Impact Assessment"* that was submitted to your Commission, was requested by the **community**, written by health professionals, reviewed by health professionals, demonstrate that should this zone request move forward, there will be long lasting health ramifications to the businesses and neighborhoods, extending out from the immediate area.

A Special Use designation, which carries a high standard for change, will in my estimation have a destabilization effect on the surrounding zoning, of M-1 and M-2 businesses, which is in conflict with B, in Resolution 270-1980.

The applicant correctly stated in their application that the closest *neighborhood* was 1,300 feet from the site. I would like to point out there are apartments, and houses within 100 feet of the Solid Waste Departments current boundaries.

A vote to *deny* this zone change modification is in my view the only appropriate vote. I respectively ask that your Commission *not approve* the zone change request for EPC Project # 1010582.

Thank you.

Deborah Armstrong

Representative Deborah A. Armstrong
District 17
New Mexico State Legislature

From: **Laura Blackwood** healthartists@icloud.com
Subject: Proposed Edith Transfer Station
Date: September 28, 2015 at 4:25 PM
To: vquevedo@cabq.gov

Peter Nicholls, Chair
Environmental Planning Commission
% City of Albuquerque Planning Department
600 2nd Street NW, 3rd Floor
Albuquerque, NM 87102

Dear Chairman Nicholls,

I am writing to express my opposition to the proposed site for the Edith Transfer Station.

As a resident of the Los Griegos Neighborhood, I live two miles from the proposed site at Edith and Griegos.
My concerns regard traffic congestion, noise pollution, air pollution, highway safety, bicycle/pedestrian safety, reduced property values, health impact, and environmental justice.

Traffic Congestion: I often enter and exit Interstate-25 at Comanche. Two weeks ago, Saturday September 12th, at about 1:57pm, my partner and I witnessed a very dangerous driving incident by a blue trash/recycling truck. We were second in line at a red light in the far-left-turn lane of Comanche (heading East), waiting to turn left to go North on the frontage road for I-25. The traffic moving East and West had green lights. The left turn arrow (to turn North) was red. It applied to both left-turn lanes. Suddenly, a trash/recycling truck zoomed (very fast, without any pause) by us in the other left-turn lane (to our right) and turned left (North) directly through the red arrow! It was really shocking! So dangerous! Luckily, there was a break in the West-bound Comanche traffic, so no accident occurred. When vehicles are heading downhill Westbound on Comanche, they temporarily become invisible (due to a large dip in the hill) to the Eastbound traffic. I am concerned that any increase in heavy truck traffic through this intersection will result in serious traffic accidents.

Highway Safety: The increased burden of heavy trucks entering and exiting I-25 at this already congested area seems like trouble to me. It is already a very congested area. Heavy trucks entering and exiting increase the likelihood of accidents in highway merging lanes.

Noise Pollution: II.C.4 The Goal is to protect the public health and welfare and enhance the quality of life by reducing noise and by preventing new land use/noise conflicts. Increased noise pollution from the increase in garbage trucks, recycling trucks, 18-wheelers, and private vehicles coming and going with trash and recycling.

Air Pollution: II.C.1.k The Goal is to improve air quality to safeguard public health and enhance quality of life.
Policy K states that citizens shall be protected from toxic air emissions.
Increased air pollution will certainly result from the increase in garbage trucks, recycling trucks, 18-wheelers, and private vehicles coming and going with trash and recycling. This will negatively impact the health of nearby residents, business owners, employees, students, and people in the nearby juvenile detention center.

Bicycle/pedestrian Safety: II.D.4.g Isn't Griegos a bike path? Where will bicyclists be diverted to? The greening of our city requires increased accessibility and increased safety for bicyclists and pedestrians.

Reduced Property Values: II.C.9, II.C.9.a Do waste transfer stations help to maintain or increase property values? Or do they cause nearby home values to drop? It seems to me that this neighborhood is a place where residents come to live in a quiet historic area close to downtown. I do not see how this facility will improve the character or home values of this neighborhood.

Environmental Justice: The most impacted neighborhood has a low income minority population that is already challenged in terms of health and quality of life by the industrial activity in the neighborhood. I am deeply concerned that the proposed Edith Transfer Station increase the cumulative burden of environmental pollutants and stress on the neighborhood residents.
One of the primary goals of the EPC is to improve quality of life within neighborhoods. Why not turn this area into a park with trees that would give life and fresh air back to the community?

Thank you for considering the health and wellbeing of the community.

Sincerely,

Laurie Blackwood
3827 San Isidro Street, NW
Albuquerque, NM 87107

Received
9/28/15
4:46pm
7-7

From: **Laurie Blackwood** somethingsmoving@earthlink.net
Subject: Edith Transfer Station - Project #1010582
Date: September 28, 2015 at 4:16 PM
To: vquevedo@cabq.gov

Peter Nicholls, Chair
Environmental Planning Commission
% City of Albuquerque Planning Department
600 2nd Street NW, 3rd Floor
Albuquerque, NM 87102

Dear Chairman Nicholls,

I am writing to express my opposition to the proposed site for the Edith Transfer Station.

First of all, why don't we reduce waste altogether? Policy IIC3b: "Encourage solid waste recycling systems which reduce the volume of waste while converting portions of the waste stream to useful products and/or energy".
The City was going to start using smaller trash collection cans, which makes so much sense to me and to many of my neighbors. Why did that not happen? It could still happen, if the City would step up to the plate and encourage the reduction of waste by charging more for picking up more trash. If we do things right, we won't be generating more trash each year and we will not need a new transfer station east of the river.

Policy IIC1k: The Goal is to improve air quality to safeguard public health and enhance quality of life.
Policy K states that citizens shall be protected from toxic air emissions.
Increased air pollution will certainly result from the increase in garbage trucks, recycling trucks, 18-wheelers, and private vehicles coming and going with trash and recycling. This will degrade the quality of life and the health of residents in the impacted neighborhood.

Thanks for considering my concerns.

Sincerely,

Kristine Roy
3827 San Isidro Street NW
Albuquerque, NM 87107

Received
9/28/15
4:46 pm
7-7

New Mexico State Senate

State Capitol
Santa Fe

COMMITTEES:

VICE CHAIR:
·Public Affairs

MEMBER:
·Education

SENATOR BILL B. O'NEILL
D-Bernalillo-13

343 Sarah Lane, NW - Apt. D
Albuquerque, NM 87114

Cell: (505) 450-9263
E-Mail: oneillsd13@billoneillfornm.com

September 23, 2015

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

RE: Zone Map Amendment: Proposed Edith Transfer Station

Dear Chairman Nicholls:

I would like to voice my strong opposition to the proposed map amendment necessary to construct the Edith Transfer Station.

As the State Senator representing this area of Edith and Comanche, I am very concerned about the impact on the surrounding residential neighborhoods of a 24-hour continuous onslaught of garbage trucks that this change would mean to the families in the immediate area (I would also point out that there is a newly constructed North Valley Little League facility just across the street).

I am also frankly offended at the "process" for community input that the city presented: instead of starting with the question of whether or not the Edith Transfer Station was a good idea, the city launched into this "choose between several options" approach, as if it had already been decided that this was going to happen.

In addition, the feasibility studies done in 2006, 2011 and 2014 centered exclusively on cost savings for the City of Albuquerque. It is clear that costs are the *only* consideration for this proposed project, and certainly not the impact on the lives of the residents of this part of Albuquerque.

I hope that your Commission will vote to *deny* the zone map amendment request made by the applicant, The City of Albuquerque.

Sincerely,

Bill O'Neill

Bill B. O'Neill
State Senator

cc: Peter Nicholls
Moises Gonzalez
Victor Beserra
Derek Bohannon
Maia Mullen
James Peck
Bill McCoy III

New Mexico State Senate

State Capitol
Santa Fe

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E-Mail: oneillsd13@billoneillfornm.com

September 23, 2015

Bill McCoy III, Commissioner
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

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Sincerely,

Bill O'Neill

Bill B. O'Neill
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Karen Hudson
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Victor Beserra
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James Peck

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343 Sarah Lane, NW - Apt. D
Albuquerque, NM 87114

Cell: (505) 450-9263
E-Mail: oneillsd13@billoneillfornm.com

September 23, 2015

James Peck, Commissioner
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

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Sincerely,

Bill O'Neill

Bill B. O'Neill
State Senator

cc: Peter Nicholls
Karen Hudson
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Bill McCoy III

New Mexico State Senate

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Cell: (505) 450-9263
E-Mail: oneillsd13@billoneillfornm.com

September 23, 2015

Derek Bohannon, Commissioner
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

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Sincerely,

Bill O'Neill

Bill B. O'Neill
State Senator

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D-Bernalillo-13

343 Sarah Lane, NW - Apt. D
Albuquerque, NM 87114

Cell: (505) 450-9263
E-Mail: oneillsd13@billoneillformm.com

September 23, 2015

Maia Mullen, Commissioner
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

RE: Zone Map Amendment: Proposed Edith Transfer Station

Dear Chairman Nicholls:

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Sincerely,

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State Senator

cc: Peter Nicholls
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E-Mail: oneillsd13@billoneillfornm.com

September 23, 2015

Victor Beserra, Commissioner
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

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Bill O'Neill

Bill B. O'Neill
State Senator

cc: Peter Nicholls
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Bill McCoy III

New Mexico State Senate

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SENATOR BILL B. O'NEILL
D-Bernalillo-13

343 Sarah Lane, NW - Apt. D
Albuquerque, NM 87114

Cell: (505) 450-9263
E-Mail: oneillsd13@billoneillfornm.com

September 23, 2015

Moises Gonzalez, Commissioner
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

RE: Zone Map Amendment: Proposed Edith Transfer Station

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Bill B. O'Neill
State Senator

cc: Peter Nicholls
Karen Hudson
Victor Beserra
Derek Bohannon
Maia Mullen
James Peck
Bill McCoy III

September 28, 2015

To: Environmental Planning Commission
c/o: Peter Nicholas, Chairman and Vicente Quevedo, Staff Planner
RE: Project#1010582

To Whom It May Concern:

On behalf of the Stronghurst Neighborhood Improvement Association, who has participated in the multiple public meetings discussing the Transfer Station Improvement Plan located on 4600 Edith NE ; we a strong community of neighbors incorporated in 1929, who work, live, and thrive in the downtown area, 1.1 miles from the proposed transfer site, oppose the zoning changes requested by Wilson & Company agent for the CABQ Municipal Department. There have been numerous objections from the Private Residents and Business alike on how developing this location for the consolidated city's waste transfer would negatively impact our immediate location in quality of life and business commerce, which include and are not limited to:

- Lack of planning to mitigate the increase in traffic and increase in public safety both large trucks and private use
- Lack of planning and remediation with the inevitable dumped and blowing trash from private use
- Lack of planning and mitigation of the public safety & health impacts of the close neighbors and commerce alike that choose to employ and live in proximity

Its been resoundingly clear through the numerous public hearings, the city intends to use this location regardless, on the premise it will "save millions of dollars" in the dumpster truck's wear and tear. Stronghurst recognizes and agrees with the immediate negative impacts of this project listed above. As a long-standing neighborhood and residents of the city of Albuquerque, we are committed to the long-term vision of our great city. We strongly believe the proposed location of the Transfer Station is also not in the best interest in the community overall from an economic development standpoint.

This Transfer Station Infrastructure Project is a short-term savings measure that Mayor Berry and the City of Albuquerque Municipal Dept are after without considering the long-term impacts of the "Dream Big Again Albuquerque" statement Berry is asking each one of us to embrace. Quoting Mayor Berry in his op'ed in the Albuquerque Journal dated Sept 26th he states emphatically that "Successful cities invest in themselves and, as important and tax and infrastructure may be, businesses follow the talent and talent searches for the highest quality of life." This includes improvement in quality of life of all its residents and the major economic development investments the CABQ is making by way of its quest to become the newest Center of Excellence in Technology and Business.

Additional points we respectfully ask you to consider:

The city is embarking on a 70 Million dollar infrastructure plan to bring the city a rapid transient train system (ART) with major depots located along Central Ave including near the corner of Broadway and Central at the public/private venture headquarters of Innovate Albuquerque. This is a walk able 2.5 miles northbound on Broadway Ave, ripe with partially demolished warehousing space, adequate parking, a budding craft beer district, and re-gentrified neighborhoods towards the Proposed Transfer Site. The exit on Comanche and I-25, which is the only egress from I 25 southbound and serves as the only route proposed for the Transfer Site. It would also serve as the primary southbound entry into our Technology Business Hub towards Innovate Albuquerque. Would we really require recruiting talent, economic development investors, residents and businesses alike to fight traffic with the dumpster trucks, view the inevitable blowing trash and smell, to get to their

place of work and residence?

Public Research shows that major technology centers (Atlanta, Chicago, Silicon Valley California, and upcoming tech centers such as Austin, TX have their Transfer locations 10-20 miles from its Economic Development Tech Centers. This isn't a short-sided decision by these economically advanced communities. Attracting Millennial Talent to their vibrant and growing cities, a city must offer more than a rapid transient system "ART" or one building complex to develop a business. Millennial Talent expects to work, live, and play all within a close proximity. Deidre Firth, CABQ's Deputy Director of Economic Development stated in the Journal dated Sept 26th, that NM can become a global leader in Optics and "We need to emphasize that New Mexico is recognized as a leader nationally and that companies look to us as a preferred location". Really? The city is creating private/public partnerships located in the downtown area for development, yet have no planning or mitigation of the health impacts of the close neighbors and commerce alike who choose to employ and live in 2.5 miles to this Proposed Transfer Site. Our neighborhood has committed to this location because of its high quality of life, intimate residential partnerships and favorable location/proximity. We're happy and proud for the high-power laser startup Tri-Lumina who is touted with being a future global leader in light-based technologies, but we're curious if they would consider moving to this "Technical Center of Excellence" surrounding Innovate Albuquerque headquarters knowing the City Transfer Dump is going to be located 2 miles away?

Stronghurst Neighborhood is the oldest incorporated neighborhood in the city and over its eighty-six years has embraced change, disputed change, and frankly put up with it. In the last decade, we've seen the CABQ strategically place a Cement Plant, Asphalt Plant, City Recycling Center, Food Pantry's and Homeless Shelters to mention a few within our pedestrian heavy neighborhood and surrounding area. We ask the EPC to consider the full spectrum of this 3-5 mile radius from the city's proposed economic development area where the city is also touting an interest and putting major city funds in recruiting talent to live, work, and play. Is there not a breaking point where our neighborhood and the surrounding area; which includes the ART depot, the economic development area including Innovate Albuquerque which is proposed a "Technical Center of Excellence", will take on a heavier burden of wide-spectrum of Public Safety Issues, and overall desirability of the neighborhoods?

Included is a table from the Health Impact Assessment for the City of Albuquerque and was part of the information presented by NVC:

Table 1. Collision rates at intersections within the impacted community.

Collision Rates	Overall Collision Rates	Fatal and Injury Collision Rates	Pedestrian Collision Rates	Bicycle Collision Rates
Up to 3 times above the average collision rate	4th Street and Griegos intersection	4th Street and Griegos intersection	N/A	N/A
Up to 2 times above the average collision rates	Edith and Comanche intersection	Edith and Comanche intersection	4th Street and Montano	4th Street and Montano
	I-25 and Comanche intersection	I-25 and Comanche intersection		2nd Street and Montano

As you see, the potential for increased collisions and fatalities for pedestrians and bicyclists will increase significantly. New York City is going through a similar debate about a new Waste Transfer Center on the Upper East Side. Following is a quote from that debate; *the study, conducted by Sam Schwartz Engineering, found that trucks caused 87 traffic deaths in the city during the last five years, and that 26 of those were caused by garbage trucks.* (New York, 2014) Garbage trucks cause 30% of all truck-related deaths in New York City. Thus, we can deduce increased truck traffic near the proposed transfer site will likely increases traffic deaths here in ABQ as well. Increased truck traffic in the city's economic development zone will likely deter not encourage new potential employees & residents who we know want to work, play, and live nearby.

We are told the future growth of our cities development doesn't currently live here. We need to attract them. If we are pursuing them, we need to pursue the quality of life they seek.

Putting this Transfer Station is a short-sided reduction of operational expenses, without looking at the long-term developmental impact of what we want Albuquerque to be. The Environmental Planning Commission is charted with reviewing developmental plans and through zoning control; determine if the location and use is in the best interest of the community. This Commission has the opportunity, right now, to stop the CABQ; who has talked out of both sides of its mouth - wanting to save operational expenses and create infrastructure to recruit companies as a "preferred location". We respectfully ask you to consider all the immediate concerns of this zoning request but also urge you look beyond the corner of Comanche and Edith and the dumpster truck's wear and tear. "Dreaming Big Again" means in action, we must look at each infrastructure project as it relates to the overall common community goal. If we want Albuquerque to be a preferred location to create business and jobs, don't stink it up with the City's Trash being collected in the middle of our Community's Future Technology Center of Excellence.

Respectfully,

Hope McIntosh – Board President
With support of all Board Members and Residents
Stronghurst Improvement Association
m.hopemcintosh@gmail.com

NOTICE OF PUBLIC HEARING

Notice is hereby given that the City of Albuquerque Environmental Planning Commission will hold a **Public Hearing on Thursday, October 8, 2015 at 8:30 a.m.**, in the Plaza del Sol Hearing Room, Lower Level, Plaza del Sol building, 600 2nd St. NW, Albuquerque, NM to consider the following items:

Distribution of the Planning Department's staff reports regarding the following items will occur at a **Case Distribution Session on Thursday, October 1, 2015 at 3:00 p.m.**, in the Office of the City Clerk, Hearing Room 1, 7th Floor, Plaza del Sol Building, 600 2nd St. NW, Albuquerque, NM.

Project# 1003675
15EPC-40048 Zone Map Amendment (Zone Change)
15EPC-40047 Site Development Plan for Building Permit

Dekker/Perich/Sabatini, agents for City of Albuquerqu Family and Community Services, request the above action for Tract C-8-B, Town of Atrisco Grant, Airport Unit, Lots & 6 Torres Addition, and a vacated portion of Esperanz Drive NW, zoned R-1 to SU-1 for R-2 and Community Cent Uses, located on Avalon Rd. NW, between 57th St. NW ar 58th St. NW, containing approximately 3.8 acres. (K-11)
Staff Planner: Catalina Lehner

Project# 1006864
15EPC-40049 Site Development Plan for Subdivision
15EPC-40050 Amendment to Site Development Plan for Subdivision

Consensus Planning agent for Pulte Homes of New Mexic Inc. requests the above actions for all or a portion of Tracts and N-2-A-1, Watershed Subdivision, zoned SU-2 for PD located on Tierra Pintada Blvd. between Mirehaven Parkw and West Creek Place, containing approximately 72.9 acr (H-8 & 9)
Staff Planner: Maggie Gould

Project# 1010581
15EPC-40045 Zone Map Amendment
15EPC-40046 Site Development Plan for Building Permit

DAC Zoning & Land Use Services, agents for Longs Pea LLC requests the above actions for Tract A-1, Block Cenaroca Subdivision, zoned C-1 to SU-1 for C-1 Uses include the Retail Sale of Beer and Wine for On and (Premises Consumption, located on Tramway Blvd. between Cloudview Ave. NE/Encantado Rd. NE and Sky Rd. NE, containing approximately 2.1 acres. (K-23)
Staff Planner: Catalina Lehner

Project# 1010582
15EPC-40051 Zone Map Amendment
15EPC-40052 Site Development Plan
For Building Permit

Wilson & Company, agent for City of Albuquerque, Department of Municipal Development, requests the above actions for all or a portion of a northerly portion of Tract 107B1A1, Tract 107B1A1 excluding portion to right-of-way & excluding a northerly portion, Tract 107B1A2 excluding portion to right-of-way, Tract 108A3A1A, Tract 108A3A1B, and Tract 108A3B, MRGCD MAP #33, zoned M-1 to SU-1 for M-1 Uses, Solid Waste Transfer Station and Convenience Center, located on Edith and Comanche (4600 Edith NE), containing approximately 22 acres. (G-15)
Staff Planner: Vicente Quevedo

Details of these applications may be examined at the Planning Department, 3rd Level, Plaza Del Sol Building, 600 Second Street NW, between 8:00 a.m. and 5:00 p.m., Monday through Friday, or you may call 924-3860. INDIVIDUALS WITH DISABILITIES who need special assistance to participate at the public hearing should call 924-3860.

Peter Nicholls, Chair
Environmental Planning Commission

TO BE PUBLISHED IN THE ALBUQUERQUE JOURNAL September 16, 2015.

APPROVED

Kym Dicome
Urban Design & Development
Planning Department

OFFICERS

David Wood, President wood_cpa@msn.com
Jill Gatwood, Vice President jillgat@gmail.com
Marca Finical, Treasurer marcia_finical@yahoo.com
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ggnaabq@gmail.com

Greater Gardner Neighborhood Association

A North Valley Association of Concerned Albuquerque Residents

September 28, 2015

=Transmitted Electronically=

Mr. Peter D. Nicholls, Chair
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

RE: ZONE MAP AMENDMENT: Proposed Edith Transfer Station
EPC Project # 1010582

Commissioner Nicholls:

Please accept this document as part of our neighborhood association's *written* testimony for the record.

This document uses the original Project Narrative as submitted by Wilson & Company. We then inserted our annotated comments on the page whenever we believed a comment was necessary or appropriate.

Our goal in this submission is to highlight the community's experience with this proposed project. This included 3 City public meetings and 2 neighborhood association, and the understanding that the independent Health Impact Assessment Committee gained of the possible health impacts from the proposed facility. We also participated by invitation of the City, on their Citizen Advisory team for *design input* for this project.

Our *annotated comments* speak for themselves on the pages. A summary of our major findings include:

- **Narrative appears to be repetitive throughout much of the document in justification.**
- **The overriding theme is that "cost savings" is the driving force for this proposed zone change.**
- **Another consistent theme is the applicant' justification attempts to marginalize our neighborhood, by *repeating, "the closest neighborhood is over 1300 feet from the site"*.**
- **In many cases when Policy is stated, the justification for that policy is either weak or not relevant at all.**
- **There is an addendum at the end, which are public comments left at the City's web site for the project.**

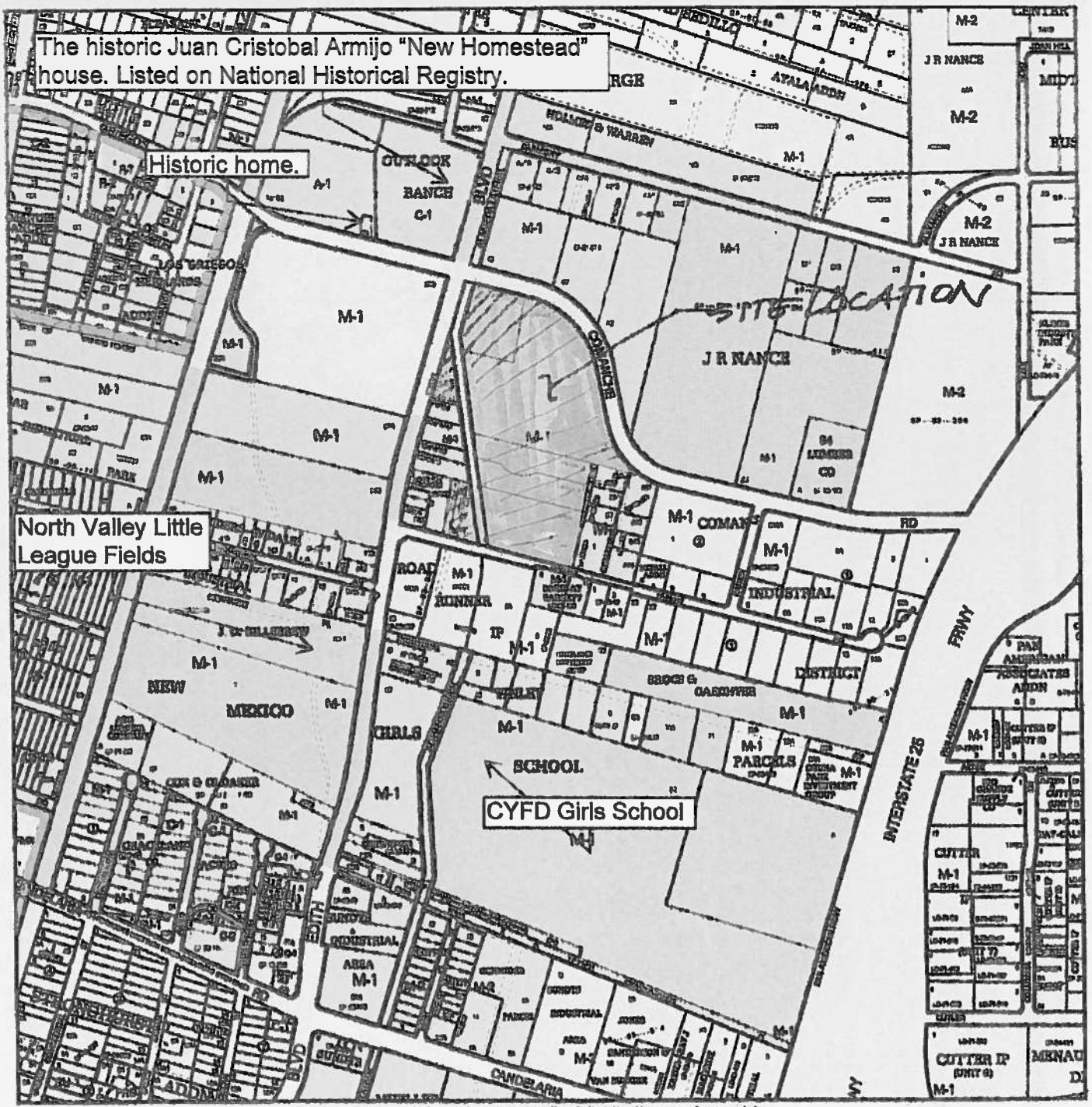
Unfortunately, a lot of our comments are repetitive, like the applicants justifications. We made a good faith effort to look at the policy referenced, and then look at the applicant's justification for that policy.

Our comments were made based on our experience and knowledge of this project. They are not casual comments; rather they are fact-based.

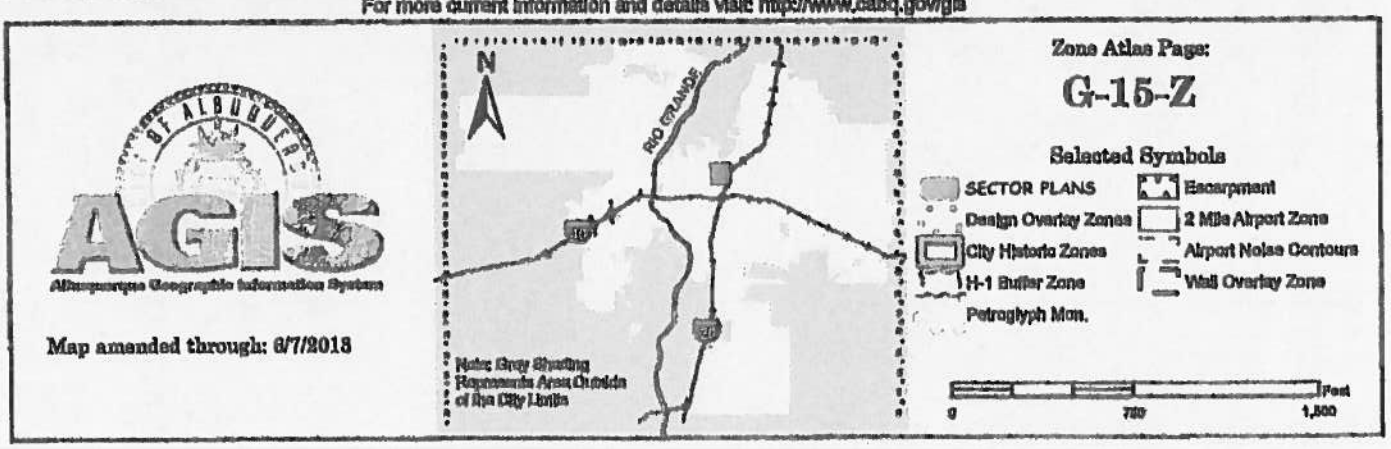
Respectively submitted to the Commission by,

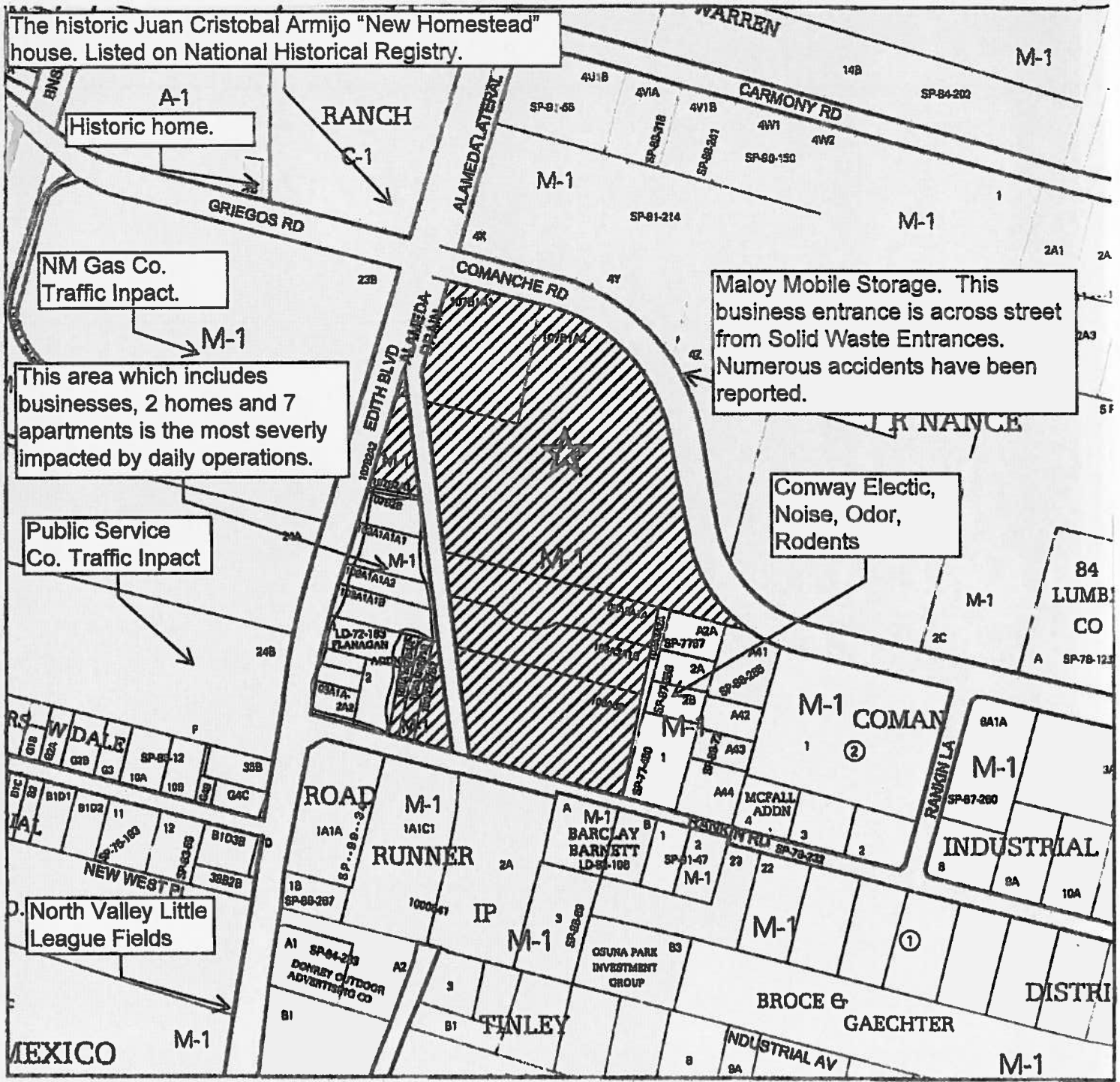
Greater Gardner Neighborhood Association

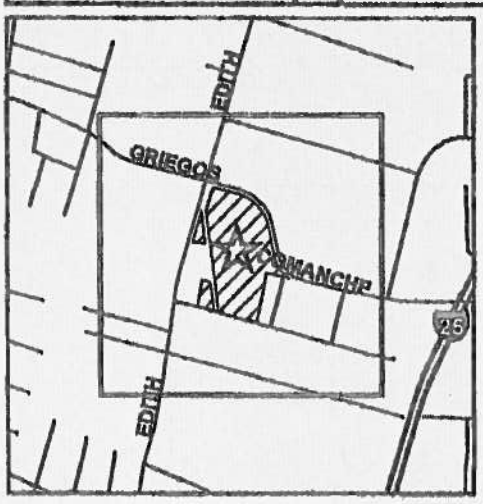
David Wood President



For more current information and details visit: http://www.cabq.gov/gis





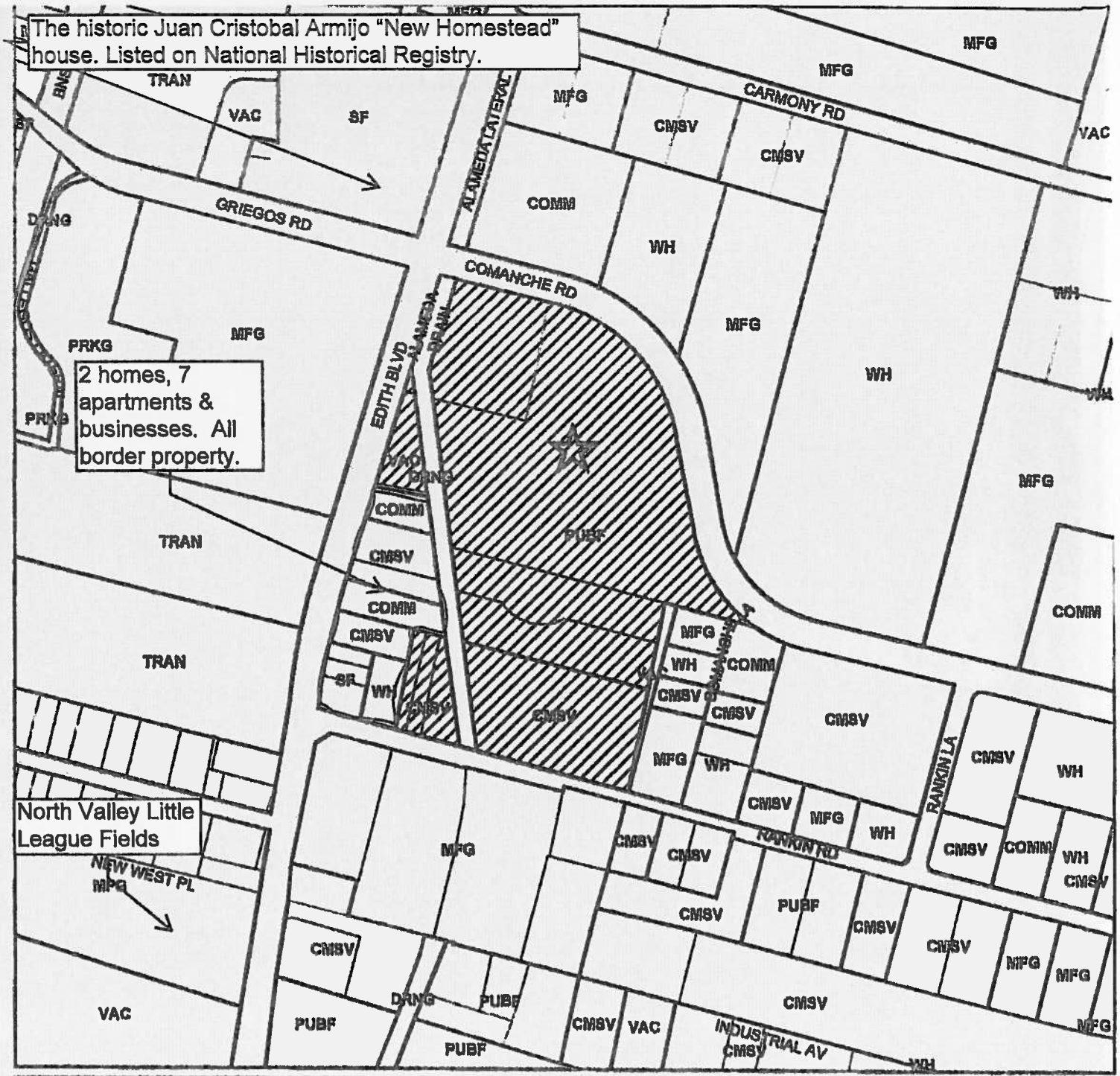


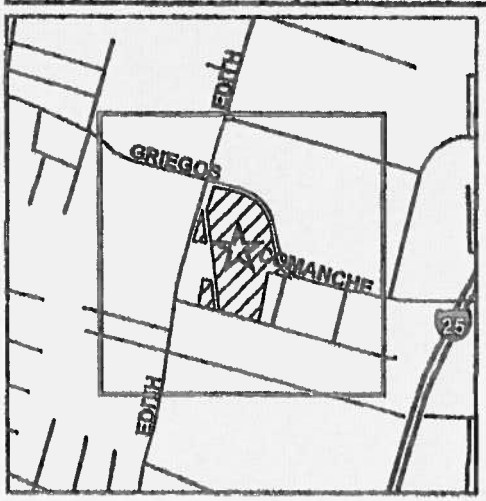
ZONING MAP

Note: Grey shading indicates County.

1 inch = 400 feet

Project Number: 1010582
Hearing Date: 10-8-2015
Zone Map Page: G-15
Additional Case Numbers: 15EPC40051 &40052





LAND USE MAP

Note: Gray shading indicates County.

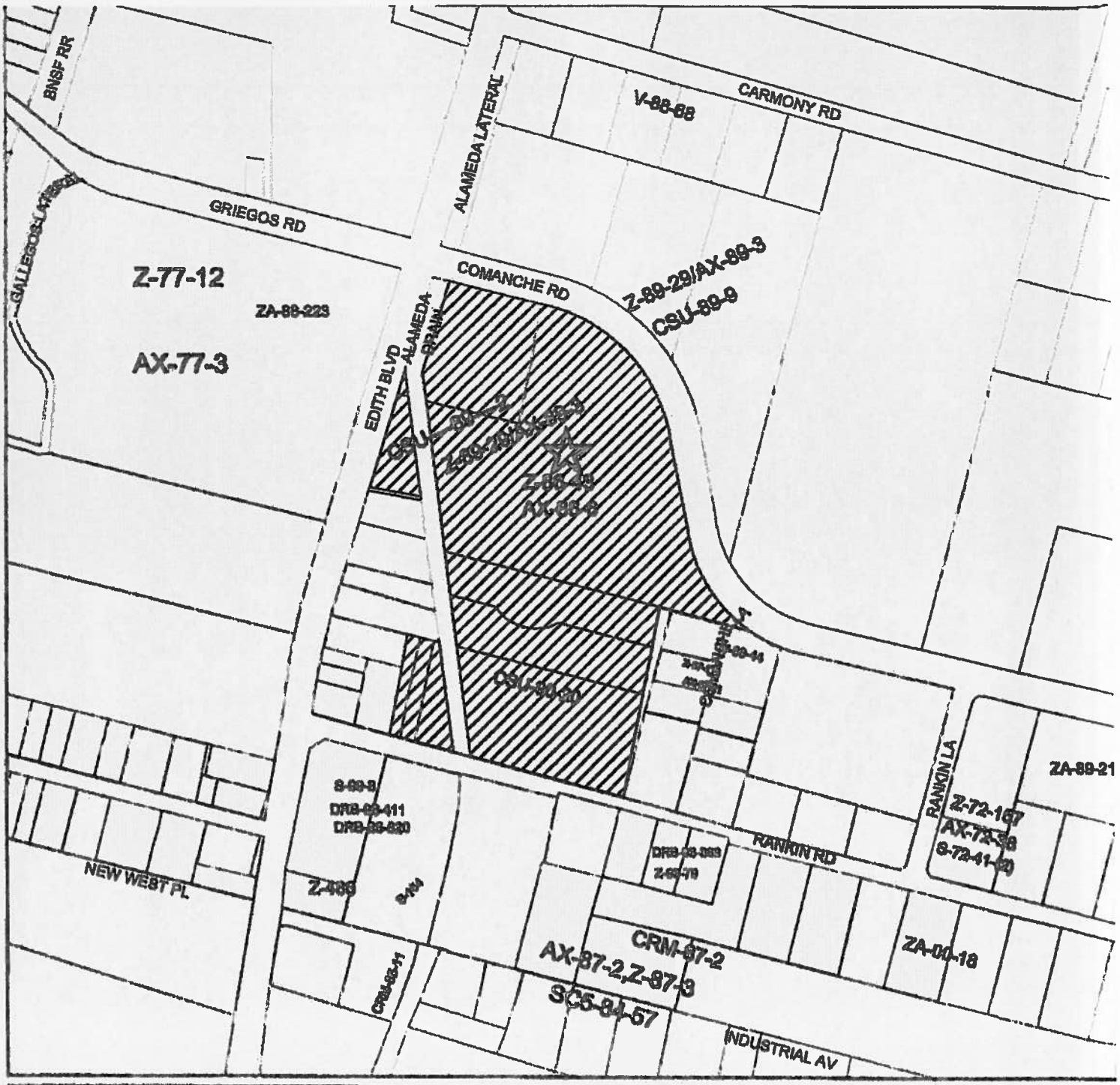
KEY to Land Use Abbreviations

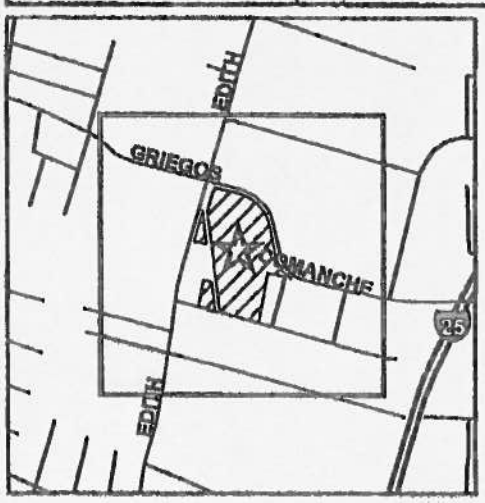
- AGRI Agriculture
- COMM Commercial - Retail
- CMSV Commercial - Service
- DRNG Drainage
- MFG Manufacturing
- MULT Multi-Family or Group Home
- PARK Park, Recreation, or Open Space
- PRKG Parking
- PUBF Public Facility
- SF Single Family
- TRAN Transportation Facility
- VAC Vacant Land or Abandoned Buildings
- WH Warehousing & Storage

AGIS

1 inch = 400 feet

Project Number: 1010582
Hearing Date: 10-8-2015
Zone Map Page: G-15
Additional Case Numbers: 15EPC40051 &40052



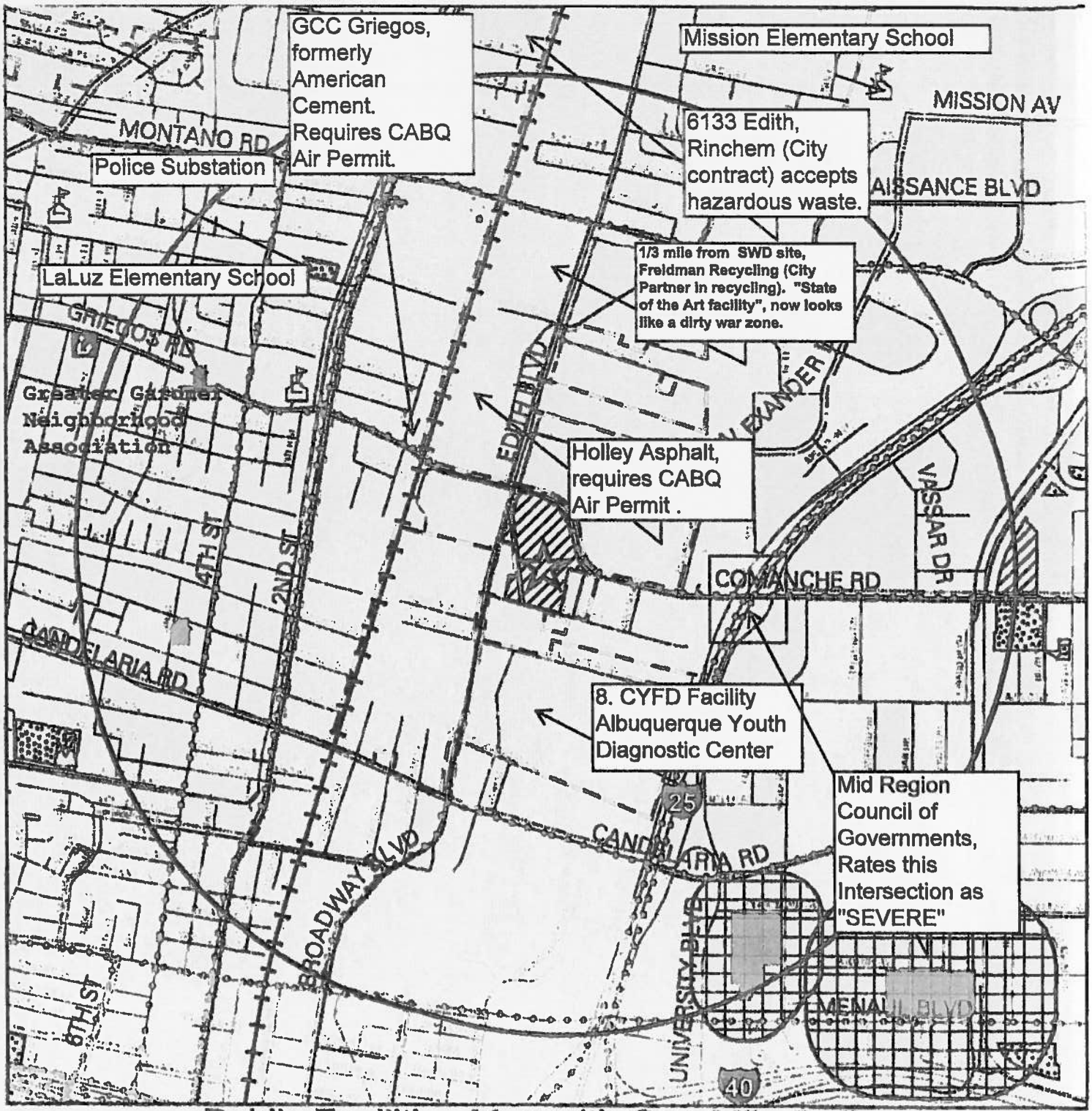


HISTORY MAP

Note: Grey shading indicates County

1 inch = 400 feet

Project Number:
1010682
Hearing Date:
10-8-2015
Zone Map Page: G-15
Additional Case Numbers:
15EPC40051 &40052



Public Facilities Map with One-Mile Buffer

COMMUNITY CENTER
MULTI-SERVICE CENTER
SENIOR CENTER
LIBRARY
MUSEUM
FIRE
POLICE
SHERIFF
SOLID WASTE
APS Schools
ABQ Ride Routes
ABQ Bike Facilities
Proposed Bike Facilities
Albuquerque City Limits
Landfill Buffer (1000 feet)
Landfills designated by EHD
Developed County Park
Undeveloped County Park
Developed City Park
Undeveloped City Park

Project Number: 1010582

0 0.5 1 Miles

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Alaska
Arizona
California
Colorado
Kansas
Louisiana
Minnesota
Missouri
Nebraska
New Mexico
Texas
Utah

Written Project Summary
Site Development Plan for Building Permit Checklist
August 27, 2015

Misrepersented. While some uses will remain. The center piece of the facility is a Transfer Station & Convenience Station. All other activities will be in support of the new Transfer Station & Convenience Station.

P AMENDMENT; SITE DEVELOPMENT PLAN FOR BUILDING PERMIT
Edith Transfer Station, COA Project No. 7006.92
4600 Edith Boulevard NE (SE corner of Edith and Comanche)
7B1A1, 107B1A2; and tracts 108A3A1A, 108A3A1B, 108A3B; together with all of tracts
08A1A2B2, 108A1A2B1B, and 108A1A2B1A and tract 107B2A1.
RGCD MAP 33 Sub
AS PAGE: G-15-Z

Prior to SWD on this site, it was occuppied by N. C. Ribble Conctruction. Former employees testify that gas, diesel, oil was dumped and buried on the site. SWD has resisted efforts to test the area for contamination.

don and History

ct site is located in an established industrial area at 4600 Edith Boulevard NE at the southeast the intersection of Comanche Road NE and Edith Boulevard NE (both are arterial streets). The City erque Solid Waste Management Department has been located at this M-1 zoned site since 1980 as not have an existing Site Development Plan.

The subject site falls within the Central Urban area and the Established Urban Area of the Comprehensive Plan and the North Valley Area Plan. The proposed Zone Map Amendment would change the existing zoning from M-1 Light Manufacturing to SU-1 for M-1 Uses, Solid Waste Transfer Station and Convenience Center. The proposed use of the site would remain very similar to its current use, and site plan control ensures changes cannot be made without some type of amendment to the site development plan, either through the EPC for major changes or administratively for minor changes.

In addition, the proposed solid waste transfer station is defined by the Environmental Protection Agency (EPA) as a light industrial-type facility where trash collection trucks discharge their loads so trash can be compacted and then reloaded into larger vehicles (e.g. trucks) for shipment to a final disposal site, typically a landfill or waste-to-energy facility (EPA, January 2001).

EPA also recomends Public participation in site selection. This process was done internally, with not community input.

Site Orientation

The approximately 22-acre property currently has several bu administration building, vehicle maintenance facilities, fuel island, storage structures and yard for bins and other equipment, parking lots for employees, and recycling drop-off bins. The site currently serves as a truck terminal for all solid waste and recycling collection vehicles and service vehicles.

NOTE: There is not another Transfer Station facility **Nationally**, that contains all the elements, Transfer & Convenience Station, Administration building, Maintaince facilty, fuel island, storage structures, vehicle and bin storage, other equipment + parking lots, and recycling drop off bins. The architects managed to squeeze it all in. But site remains too small (22 acres) for safety & functionality.
Unforseen Consequences.

similar to that of the existing site but will be thetically pleasing buildings and facilities. They

HIGHER Relationships

include a 62,000 sf transfer station/convenience center building; 11,600 sf administration building; 40,100 sf vehicle maintenance building; 3,900 sf household hazardous waste building; 33,400 sf parking structure; 555 sf scalehouse; parking for employees and collection vehicles; bin repair area; and recycling drop-off area. The existing fuel island will remain in place and provisions will be made for a future compressed natural gas (CNG) fuel island.

The administration building will be located to face Comanche Road. The transfer station is proposed to be located south of the administration building. The entrance into the transfer station building for convenience center traffic will face east, while the entrance into the building for collection trucks will face south, and the exits out of the building for both will face south. The load-out for transfer trucks will open to the north and south and is located on the west side of the transfer station. The maintenance building will be located at the south end of the site and the truck bay doors will open to the east and west. The parking structure will be located at the southeast corner of the property with its entrance/exit from Rankin Road.

Site Access

There are currently three access points to this industrial site located on Comanche, Edith, and Rankin Road. For the proposed site development plan, these full access points (left-in, left-out, right-in, right-out) would remain. The site has been designed to use these specific entrances/exits to keep larger collection and transfer trucks separate from public self-haulers, visitors, and staff, while allowing for flexible access.

1. The Comanche access is located approximately 425 feet east of the signalized intersection of Edith Boulevard and Comanche Road. Public self-haulers to the convenience center, visitors, and administrative staff would enter/exit the site from this location. In addition, collection trucks would enter the site from this location.
2. The Edith access is currently located approximately 550 feet south of the signalized intersection of Edith Boulevard and Comanche Road. It would be shifted south (approximately 70 feet), further away from the signal, which could help improve functionality of the signalized intersection. Transfer trucks would enter/exit the site from this location. Collection trucks would enter/exit the site from this location. Driver and maintenance employees would also enter/exit from this location.
3. The Rankin Road access is located along the south side of the property. Driver and maintenance employees would enter/exit from this location.

Traffic Impact

Refer to submitted independant traffic analysis by **Sustainable System Research, LLC.**

While the site generated traffic ~~does not meet the warranting~~ criteria for a Traffic Impact Study (100 or more additional (new) peak direction, inbound or outbound vehicle trips to or from the site in the morning or evening peak period of the adjacent roadways), we did complete a traffic impact study for the proposed site development plan and its uses.

The signalized intersections of Edith and Comanche, 2nd Street and Griegos, I25 Southbound Frontage Road and Comanche, I25 Northbound Frontage Road and Comanche (each the confluence of two arterial streets) currently have an acceptable Level of Service (LOS) of D (acceptable per Development Process Manual, Chapter 23 Transportation Design, Section 8 Traffic Impact Studies). The Traffic Impact Study for the subject site development plan and its uses shows that these intersections would continue to have an acceptable LOS of D because the new trips generated by the site redevelopment occur primarily outside of the AM and PM peak hours. The site currently has all collection trucks leaving in the morning and returning in the afternoon. The new trips generated by the site consist of the new return trip by collection trucks to the transfer station

and their new trip back out to their collection route, both occurring after the AM peak hour and before the PM peak hour. The new trips also include the new transfer truck trips from the site to the landfill and the return trip from the landfill to the site, and the convenience center traffic to and from the site, occurring primarily after the AM peak hour and before the PM peak hour.

The signalized intersection of 4th Street and Griegos currently has a LOS of F and since no new truck traffic this intersection nor any residential neighborhoods it will continue to have a LOS of F regardless of this site redevelopment.

Because the transfer trucks will only circulate between the site and Interstate 25 via Comanche Road, there will be no new truck traffic into or through any residential neighborhoods. Transfer trucks entering the site will utilize Interstate 25 northbound, Comanche westbound, Edith southbound and into the site via the driveway located approximately 550 feet south of the intersection of Comanche and Edith. Transfer trucks leaving the site will take a right onto Edith northbound, Comanche eastbound, and onto Interstate 25 southbound.

On-Site Parking

The proposed layout and amount of parking will meet the needs for each of the buildings and its users as it is designed to include parking for all daily staff as well as visitors. Personal vehicle parking areas are in two areas of the site. One area is at the north of the site and one is at south end of the site. Both areas provide accessible parking, motorcycle parking and bicycle parking as well per City Zoning Code requirements.

The north area of the site provides 109 spaces. This will accommodate the approximate 70 staff in the adjacent administration building, six employees for the transfer station, scalehouse and HHW, as well as visitors.

The south area is a two level parking structure with a total of 210 spaces which will provide parking for the maintenance staff and drivers. The provided parking is based on a total of daily shift of 208 employees for this area of the site. This total includes the vehicle maintenance service bays and parts which will have a typical shift of 18 staff, supervisors and operations located in the 2-story portion of the vehicle maintenance building (approximately 30 employees), and approximately 160 collection truck drivers who will park and depart the site for daily routes.

Total parking spaces provided is 319 spaces. An analysis of the City Zoning Code § 14-16-1-5 indicates a required number of parking spaces based on use, to be 279 spaces. Note: The design assumes that a collection truck driver will park a personal vehicle in a separate space from the truck space; parking totals are separate from parking required for fleet vehicles.
The south area of the site provides 173 spaces for collection trucks, while there are two areas provided for light duty trucks (44 spaces). They include 20 light duty truck spaces along the south property line, and 24 light duty truck spaces to the west of the north administration building staff/visitor parking area.

Building Elevations and Signage

The administration building design will be contemporary in style defined by the use of simple architectural elements that will be repeated with the other structures on site for overall design continuity. This 2-story office building will be the signature architectural component of the facility facing the main public entry and

oriented to the intersection of Comanche and Edith. The architecture will be defined by use of light-green-tinted glass, exterior insulation finish systems (EIFS), metal shading canopies and metal accent panels. The design plan is L-shaped with the second floor offset from the first floor with column accents. Balconies and stair tower features complete the architectural composition.

In addition to light-green-tinted glass and light bronze anodized metal, the proposed color palette of the structures will include a thematic khaki tan with accents of white and gray. Larger walls will be precast concrete with an integral dark tan color and finished with a light sandblast to provide architectural texture and character. These walls will alternate with smooth painted walls that may have off-white accents. In addition, these high mass walls will help with buffering sound from interior activities as well as offer long term durability. As it is used on the administration building, EIFS will also be used on the transfer station for architectural continuity. All concrete and EIFS surfaces will be defined with a horizontal reveal pattern including larger proportions for more distant visibility and smaller scale for pedestrian level. In addition, the upper portion of the transfer station will be designed for sightlines and off-site viewpoints. Mechanical ventilation equipment will be housed in rooms at floor level instead of on the roof. Rooftop parapets will assure that the view is of the building architecture and not a roof surface.

Some structures (e.g. the scalehouse) will use integral color concrete masonry in a stack bond pattern. The masonry will be used in low building walls adjacent to walks and drives to resist incidental damage. This masonry will also will be used for on-site screen walls and the 8-ft high site perimeter walls at street frontages to mitigate any critical sightlines.

The intent of primary signage will be to provide clear way-finding to public users as well as traffic control signs for public safety. Sign construction materials will be composite aluminum plaques and/or raised aluminum text. All monument-style signs will be mounted on concrete or masonry walls; post style will be square tube. Two monument signs are proposed: a 5-ft high, 10ft long primary entry sign on Comanche for the main public entrance; and a 4-ft high, 8-ft long secondary entry sign on Edith. The signs are designed with integral color split face block bases and will have photocell lighting. Primary directional signs at the entry drive (e.g. "Public Recycle Drop-off & Convenience Center") will be monument style.

Drainage

Existing Conditions:

The site is not located within a designated FEMA flood plain map, see firm maps 35001C0119G and 35001C0332G. The existing site topography generally slopes from east to west. The existing drainage infrastructure diverts all the site flows through a series of water/oil separators and inlets into two ponds located on the north and south of the site. The larger detention pond to the north has an outlet structure that discharges through a 30" corrugated metal pipe (cmp) into a drainage system in Comanche Road. The pond has a maximum allowable discharge of 47.6 cubic feet per second (cfs). The northern three quarters of the site drains into this pond. The remainder of the site drains into the smaller retention pond to the southwest corner of the site.

The commercial businesses to the east of the site also drain from the east to west. The buildings on these commercial sites are approximately 10'-15' higher than the site's existing grade. The offsite flows will flow directly to the west. The northern half of the offsite flows eventually drain into the north pond and the southern half of the offsite flows drain into the south retention pond. The area to the north of the site is

Commercial business on the West, have lower elevation than SWD. Runoff has impacted American Marine, 4404 Edith NE, for years. No mitigation.

Comanche Road and it has existing drainage infrastructure in place to prevent flows from being discharged to the project site. Rankin Road to the south drains east to west and the flows do not enter the property. The area to the west of the site drains east to west and those flows will enter Edith Boulevard and its existing drainage infrastructure.

We are not sure

Proposed Conditions:
The proposed site will maintain the general flow direction of east to west. The existing drainage system will be replaced and new water/oil separators and inlets will be installed. The retention pond located on the southwest corner will be removed. This pond will be replaced with a detention pond located to the northeast of its existing location. The new pond will be connected to the reconfigured north pond and will maintain the maximum allowable discharge of 47.6 cfs.

Landscaping
The landscape is designed to screen and soften the visual and environmental impact of the proposed facility. This will be accomplished in-depth via a combination of walls, shrubs, and trees. Plant species have been selected for low water use and compatibility with the uses of the proposed site. The landscape will be irrigated with low-flow bubblers providing efficient point irrigation at each plant. The existing site currently contains 15 trees, many of which are Siberian Elms that have grown opportunistically in inappropriate locations. The Siberian Elms are an invasive species that will be removed during demolition operations. The proposed landscape plan includes street trees, parking lot trees, screening trees, and other shade or accent trees throughout the site, greatly increasing the total number of trees at the facility. These trees will help mitigate the urban heat island effect and increase the urban forest coverage in the area, as well as help to screen the facility. All planting areas will be covered with gravel mulches in order to further preserve water, prevent erosion, and minimize dust and weed growth.

Passive water harvesting techniques will be employed throughout the parking areas to supplement the piped irrigation system and support tree health.

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&COMPANY

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505-348-4055 fax

Alaska
Arizona
California
Colorado
Kansas
Louisiana
Minnesota
Missouri
Nebraska
New Mexico
Texas
Utah

August 27, 2015

Mr. Peter D. Nicholls, Chair
Environmental Planning Commission
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

RE: ZONE MAP AMENDMENT; SITE DEVELOPMENT PLAN FOR BUILDING PERMIT
Proposed Edith Transfer Station, COA Project No. 7006.92
at 4600 Edith Boulevard NE (SE corner of Edith and Comanche)
Tracts 107B1A1, 107B1A2; and tracts 108A3A1A, 108A3A1B, 108A3B; together with all of tracts 108A1A2B2, 108A1A2B1B, and 108A1A2B1A and tract 107B2A1; MRGCD MAP 33 Subdivision
ZONE ATLAS PAGE: G-15-Z

Misrepersented. While some uses will remain. **The center piece of the facility is a Transfer Station and a ConvenienceStation.** All other activities will be in support of the new Transfer Station & Convenience Station.

Nicholls:

any, Inc. on behalf of the City of Albuquerque Department of Municipal Development and nagement Department requests approval of a Zone Map Amendment for Tracts 107B1A1, acts 108A3A1A, 108A3A1B, 108A3B; together with all of tracts 108A1A2B2, 108A1A2B1B, d tract 107B2A1 of the MRGCD MAP 33 Subdivision and Site Development Plan for Building .

d History

is located in an established industrial area at 4600 Edith Boulevard NE at the southeast tersection of Comanche Road NE and Edith Boulevard NE (both are arterial streets). The City Solid Waste Management Department has been located at this M-1 zoned site since 1980 and it does not have an existing Site Development Plan.

The subject site falls within the Central Urban area and the Established Urban Area of the Comprehensive Plan and the North Valley Area Plan. The proposed Zone Map Amendment would change the existing zoning from M-1 Light Manufacturing to SU-1 for M-1 Uses, Solid Waste Transfer Station and Convenience Center. The proposed use of the site would remain very similar to its current use, and site plan control ensures changes cannot be made without some type of amendment to the site development plan, either through the EPC for major changes or administratively for minor changes.

No Compaction proposal that we are aware of.

In addition, the proposed solid waste transfer station is defined by the Environmental Protection Agency (EPA) as a light industrial-type facility where trash collection trucks discharge their loads so trash can be compacted and then reloaded into larger vehicles (e.g. trucks) for shipment to a final disposal site, typically a landfill or waste-to-energy facility (EPA, January 2001).

A waste-to-energy facility is much prefered over landfill, and transfer station. City has not met its own goals for reducing landfill use.

HIGHER Relationships

NOTE: There is not another Transfer Station **Nationally**, that contains all the elements, Transfer & Convenience Station, Administration building, Maintaince facilty, fuel island, storage structures, vehicle and bin storage, other equipment + parking lots, and recycling drop off bins. The architects managed to squeeze it all in. But site remains too small (22 acres) for safety & functionality.
Unforseen Consequences.

Site Orientation

The approximately 22-acre property currently has several buildings and appurtenances including an administration building, vehicle maintenance facilities, fuel island, storage structures and yard for bins and other equipment, parking lots for employees, and recycling drop-off bins. The site currently serves as a truck terminal for all solid waste and recycling collection vehicles and service vehicles.

The proposed site buildings and appurtenances are very similar to that of the existing site but will be constructed as state-of-the-art, energy efficient, and aesthetically pleasing buildings and facilities. They include a 62,000 sf transfer station/convenience center building; 11,600 sf administration building; 40,100 sf vehicle maintenance building; 3,900 sf household hazardous waste building; 33,400 sf parking structure; 555 sf scalehouse; parking for employees and collection vehicles; bin repair area; and recycling drop-off area. The existing fuel island will remain in place and provisions will be made for a future compressed natural gas (CNG) fuel island.

The administration building will be located to face Comanche Road. The transfer station is proposed to be located south of the administration building. The entrance into the transfer station building for convenience center traffic will face east, while the entrance into the building for collection trucks will face south, and the exits out of the building for both will face south. The load-out for transfer trucks will open to the north and south and is located on the west side of the transfer station. The maintenance building will be located at the south end of the site and the truck bay doors will open to the east and west. The parking structure will be located at the southeast corner of the property with its e

This shift of 70 ft. puts it dangerously close to **American Marine** business. This is a negative impact.

Site Access

There are currently three access points to this industrial site located on Comanche, Edith, and Rankin Road. For the proposed site development plan, these full access points (left-in, left-out, right-in, right-out) would remain. The site has been designed to use these specific entrances/exits to keep larger collection and transfer trucks separate from public self-haulers, visitors, and staff, while allowing for flexible access.

1. The Comanche access is located approximately 425 feet east of the signalized intersection of Edith Boulevard and Comanche Road. Public self-haulers to the convenience center, visitors, and administrative staff would enter/exit the site from this location. In addition, collection trucks would enter the site from this location.

2. The Edith access is currently located approximately 550 feet south of the signalized intersection of Edith Boulevard and Comanche Road. It would be shifted south (approximately 70 feet), further away from the signal, which could help improve functionality of the signalized intersection. Transfer trucks would enter/exit the site from this location. Collection trucks would enter/exit the site from this location. Driver and maintenance employees would also enter/exit from this location.

3. The Rankin Road access is located along the south side of the property. Driver and maintenance employees would enter/exit from this location.

Refer to submitted independant traffic analysis by Sustainable System Research, LLC. We believe there are faulty assumptions in City Traffic study.

Traffic Impact

While the site generated traffic does n ore additional (new) peak direction, inbound or outbound vehicle trips to or from the site in the morning or evening peak period of the adjacent roadways), we did complete a traffic impact study for the proposed site development plan and its uses.

The signalized intersections of Edith and Comanche, 2nd Street and Griegos, I25 Southbound Frontage Road and Comanche, I25 Northbound Frontage Road and Comanche (each the confluence of two arterial streets) currently have an acceptable Level of Service (LOS) of D (acceptable per Development Process Manual, Chapter 23 Transportation Design, Section 8 Traffic Impact Studies). The Traffic Impact Study for the subject site development plan and its uses shows that these intersections would continue to have an acceptable LOS of D because the new trips generated by the site redevelopment occur primarily outside of the AM and PM peak hours. The site currently has all collection trucks leaving in the morning and returning in the afternoon. The new trips generated by the site consist of the new return trip by collection trucks to the transfer station and their new trip back out to their collection route, both occurring after the AM peak hour and before the PM peak hour. The new trips also include the new transfer truck trips from the site to the landfill and the return trip from the landfill to the site, and the convenience center traffic to and from the site, occurring primarily after the AM peak hour and before the PM peak hour.

The signalized intersection of 4th Street and Griegos currently has a LOS of F and since no new truck traffic this intersection nor any residential neighborhoods it will continue to have a LOS of F regardless of this site

Mid Rio Grande Council of Governments, rates this intersection as "SEVERELY CONGESTED"

Because the transfer trucks will only circulate between the site and Interstate 25 via Comanche Road, there will be no new truck traffic into or through any residential neighborhoods. Transfer trucks entering the site will utilize Interstate 25 northbound, Comanche westbound, Edith southbound and into the site via the driveway located approximately 550 feet south of the intersection of Comanche and Edith. Transfer trucks leaving the site will take a right onto Edith northbound, Comanche eastbound, and onto Interstate 25 southbound.

But local route trucks, which previously didn NOT come & go to the subject site, but instead went directly to the dump, will now need to use this intesection to get to the Transfer Station Also many private vehicles will use this route to the convenience station.

On-Site Park
The propose
designed to include parking for all daily staff as well as visitors. Personal vehicle parking areas are in two areas of the site. One area is at the north of the site and one is at south end of the site. Both areas provide accessible parking, motorcycle parking and bicycle parking as well per City Zoning Code requirements.

The north area of the site provides 109 spaces. This will accommodate the approximate 70 staff in the adjacent administration building, six employees for the transfer station, scalehouse and HHW, as well as visitors.

The south area is a two level parking structure with a total of 210 spaces which will provide parking for the maintenance staff and drivers. The provided parking is based on a total of daily shift of 208 employees for this area of the site. This total includes the vehicle maintenance service bays and parts which will have a typical shift of 18 staff, supervisors and operations located in the 2-story portion of the vehicle maintenance building (approximately 30 employees), and approximately 160 collection truck drivers who will park and depart the site for daily routes.

Total parking spaces provided is 319 spaces. An analysis of the City Zoning Code § 14-16-1-5 indicates a required number of parking spaces based on use, to be 279 spaces. Note: The design assumes that a collection truck driver will park a personal vehicle in a separate space from the truck space; parking totals are separate from parking required for fleet vehicles.

The south area of the site provides 173 spaces for collection trucks, while there are two areas provided for light duty trucks (44 spaces). They include 20 light duty truck spaces along the south property line, and 24 light duty truck spaces to the west of the north administration building staff/visitor parking area.

Building Elevations and Signage

The administration building design will be contemporary in style defined by the use of simple architectural elements that will be repeated with the other structures on site for overall design continuity. This 2-story office building will be the signature architectural component of the facility facing the main public entry and oriented to the intersection of Comanche and Edith. The architecture will be defined by use of light-green-tinted glass, exterior insulation finish systems (EIFS), metal shading canopies and metal accent panels. The design plan is L-shaped with the second floor offset from the first floor with column accents. Balconies and stair tower features complete the architectural composition.

In addition to light-green-tinted glass and light bronze anodized metal, the proposed color palette of the structures will include a thematic khaki tan with accents of white and gray. Larger walls will be precast concrete with an integral dark tan color and finished with a light sandblast to provide architectural texture and character. These walls will alternate with smooth painted walls that may have off-white accents. In addition, these high mass walls will help with buffering sound from interior activities as well as offer long term durability. As it is used on the administration building, EIFS will also be used on the transfer station for architectural continuity. All concrete and EIFS surfaces will be defined with a horizontal reveal pattern including larger proportions for more distant visibility and smaller scale for pedestrian level. In addition, the upper portion of the transfer station will be designed for sightlines and off-site viewpoints. Mechanical ventilation equipment will be housed in rooms at floor level instead of on the roof. Rooftop parapets will assure that the view is of the building architecture and not a roof surface.

Some structures (e.g. the scalehouse) will use integral color concrete masonry in a stack bond pattern. The masonry will be used in low building walls adjacent to walks and drives to resist incidental damage. This masonry will also will be used for on-site screen walls and the 8-ft high site perimeter walls at street frontages to mitigate any critical sightlines.

The intent of primary signage will be to provide clear way-finding to public users as well as traffic control signs for public safety. Sign construction materials will be composite aluminum plaques and/or raised aluminum text. All monument-style signs will be mounted on concrete or masonry walls; post style will be square tube. Two monument signs are proposed: a 5-ft high, 10ft long primary entry sign on Comanche for the main public entrance; and a 4-ft high, 8-ft long secondary entry sign on Edith. The signs are designed with integral color split face block bases and will have photocell lighting. Primary directional signs at the entry drive (e.g. "Public Recycle Drop-off & Convenience Center") will be monument style.

Drainage

Existing Conditions:

The site is not located within a designated FEMA flood plain map, see firm maps 35001C0119G and 35001C0332G. The existing site topography generally slopes from east to west. The existing drainage infrastructure diverts all the site flows through a series of water/oil separators and inlets into two ponds located on the north and south of the site. The larger detention pond to the north has an outlet structure that discharges through a 30" corrugated metal pipe (cmp) into a drainage system in Comanche Road. The

pond has a maximum allowable discharge of 47.6 cubic feet per second (cfs). The northern three quarters of the site drains into this pond. The remainder of the site drains into the smaller retention pond to the southwest corner of the site.

The commercial businesses to the east of the site also drain from the east to west. The buildings on these commercial sites are approximately 10'-15' higher than the site's existing grade. The offsite flows will flow directly to the west. The northern half of the offsite flows eventually drain into the north pond and the southern half of the offsite flows drain into the south retention pond. The area to the north of the site is Comanche Road and it has existing drainage infrastructure in place to prevent flows from being discharged to the project site. Rankin Road to the south drains east to west and the flows do not enter the property. The area to the west of the site drains east to west and those flows will enter Edith Boulevard and its existing drainage infrastructure.

Proposed Conditions:
The proposed site will maintain the general flow direction of east to west. The existing drainage system will be replaced and new water/oil separators and inlets will be installed. The retention pond located on the southwest corner will be removed. This pond will be replaced with a detention pond located to the northeast of its existing location. The new pond will be connected to the reconfigured north pond and will maintain the maximum allowable discharge of 47.6 cfs.

Landscaping
The landscape is designed to screen and soften the visual and environmental impact of the proposed facility. This will be accomplished in-depth via a combination of walls, shrubs, and trees. Plant species have been selected for low water use and compatibility with the uses of the proposed site. The landscape will be irrigated with low-flow bubblers providing efficient point irrigation at each plant. The existing site currently contains 15 trees, many of which are Siberian Elms that have grown opportunistically in inappropriate locations. The Siberian Elms are an invasive species that will be removed during demolition operations. The proposed landscape plan includes street trees, parking lot trees, screening trees, and other shade or accent trees throughout the site, greatly increasing the total number of trees at the facility. These trees will help mitigate the urban heat island effect and increase the urban forest coverage in the area, as well as help to screen the facility. All planting areas will be covered with gravel mulches in order to further preserve water, prevent erosion, and minimize dust and weed growth.

Never discussed. Question implementation.

Passive water harvesting techniques ~~will be employed throughout the parking areas~~ to supplement the piped irrigation system and supp

Applicant also states a zone change is not really needed. If so, there is no basis for a zone change under R270-1980

ZONE MAP AMENDMENT
Per the policies and criteria of Resolution 270-1980, the requested zone change is justified as follows:

Resolution 270-1980 (Policies for Zone Map Change Applications)
This Resolution outlines policies and requirements for deciding zone map change applications pursuant to the Comprehensive City Zoning Code. The requested zone map amendment meets and furthers applicable policies and criteria as follows:

Response speaks to efficiency. Does not address health, safety, morals and welfare.

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

The proposed zone change is consistent with the health, safety, morals and general welfare of the City. It will create conditions for a more efficient solid waste collection system to meet the service needs of our growing community. By using a consolidated, city-wide transfer station, collection trucks will no longer have to drive each load out to the Cerro Colorado Landfill (approximately 20 miles each way). This saves over 2 million miles of travel by collection trucks per year and reduces fuel use and the City's emissions/carbon footprint;

Household hazardous waste can be kept on site for up to 90 days. Saftey & health hazzard.

The convenience center will provide a convenient drop-off location for the public, recycling, disposal of large items and household hazardous waste. This centralized location will potentially save additional miles travelled by the public (6.5 miles each way between Eagle Rock Convenience Center and Edith Transfer Station). We expect this to also further reduce the amount of illegal dumping that is related to travel distance to the landfill or other convenience centers.

Not demonstrated.

The site's existing outdated facilities will be redeveloped into a state-of-the art, energy efficient and aesthetically pleasing public facility that will enhance the industrial area in which it resides. New perimeter and on-site landscaping will further improve the visual quality of the area.

In addition, it furthers the applicable goals and policies of the Comprehensive Plan and the North Valley Area Plan (See Section C below).

(B). Stability of land use and zoning is desir
for the change. The burden is on the applic
show why the change should not be made.

A approved site plan is also required under M-1, but site plan does not equate to stability of land use and zoning.

Not if maintained.

The proposed zone change will promote stability of land use and zoning by providing site plan control. This will ensure that changes cannot be made without some type of amendment to the site development plan, either through the EPC for major changes or administratively for minor changes. The existing M-1 zoned site does not currently have a site development plan, so the existing facility could remain and add more M-1 uses without a review process. The existing facilities will continue to decline and the comprehensive improvements of the proposed project cannot be made without the change. A zone change that allows this project will result in the savings of $75 million over 20 years, the operational advantages of the new facility, the convenience to the citizens of Albuquerque, and the fuel savings and decreased emissions/carbon footprint.

First of many "cost based" justifications.

(C). 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 develop
been adopted by the City.

While there is language in the N. Valley Area plan allowing a transfer station. In that same area plan, is also a recomendation from a 100 member advisory team, recommending NO TRANSFER STATION. Another example of community recomendations NOT being adopted.

*The proposed zone change meets and furthers numerous applicable City goals a
compliance with the Comprehensive Plan and the North Valley Area Plan.*

Many instances of non compliance

Albuquerque / Bernalillo County Comprehensive Plan

Central Urban
The subject site is located in the area designated Central Urban by the Comprehensive Plan. The Goal is 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.

The proposed zone change is not in conflict with this goal or the policies of areas designated Central Urban because the site's location, in an established industrial area, will not detract from the character of any residential neighborhood. It helps further the Goal and its applicable policies as described below.

Policy II.B.6a: New public, cultural, and arts facilities should be located in the Central Urban area and existing facilities preserved.

This project will replace the existing outdated and inefficient buildings with state of the art, energy efficient, and aesthetically pleasing new public facilities. The zone change will facilitate a development that will include new educational programs and the current Keep Albuquerque Beautiful program for youth, residents, and businesses to teach and encourage sustainability, recycling, and an understanding of solid waste management.

Policy II.B.6b: Upgrading efforts in neighborhoods within the Central Urban Area should be continued and expanded and linkages created between residential areas and cultural/arts/recreation facilities.

A state of the art facility is a Waste to Energy facility as recommended in the Coprehensive PLan.

l replace the existing outdated inefficient buildings with state of the art, energy efficient, and leasing new public facilities; and will provide landscaping and streetscape along Comanche and enhance the site's industrial neighborhood/area.

Applicants justification is none of these.

ban Area
a Central Urban Area, the subject site is also part of the Established Urban Area and as such is subject to policies of Section II.B.5. The Goal is to create a quality urban environment which perpetuates the tradition of identifiable, individual but integrated communities within the metropolitan area and which offers variety and maximum choice in housing, transportation, work areas, and life styles, while creating a visually pleasing built environment.

The proposed zone change is not in conflict with this Goal or the policies of the areas designated Established Urban Area. The new state of the art, energy efficient, and aesthetically pleasing new public facilities will create a quality urban environment as well as a visually pleasing built environment through landscape and improving the streetscape. This will perpetuate and enhance the identity of this established industrial area. It will help further this goal and its applicable policies as described below.

Policy II.B.5a: The Developing Urban and Established Urban Areas as shown by the Plan map shall allow a full range of urban land uses, resulting in an overall gross density up to 5 dwelling units per acre.

Main use would be new, not at all similiar to current operations.

The current zoning in this industrial area is predominantly M-1. With approval of this request, the proposed uses of the site would remain very similar to its current uses plus a transfer station and convenience center that minimally add to a full range of urban land uses. Site plan control ensures changes cannot be made without some type of amendment to the site development plan, either through the EPC for major changes or administratively for minor changes.

Policy II.B.5d: **The location, intensity, and design of new development shall respect existing neighborhood values, natural environmental conditions and carrying capacities, scenic resources, and resources of other social, cultural, recreational concern.**

We believe this proposal does not respect any of the listed concerns.

This is an existing Solid Waste Management facility that currently includes vehicle maintenance facilities, [illegible] employee parking, collection truck parking, bin repair, and other [illegible] manufacturing, industrial and commercial properties. The new [illegible] greatly enhance and respect the site's established industrial [illegible] nce and protect the Alameda Lateral that runs along the west [illegible] Rio Grande Conservancy District (MRGCD) access, stabilizing its [illegible] bonding of the first flush of stormwater will minimize contaminants from entering the Rio Grande). The visual quality of this industrial area will be enhanced by the project's new buildings and the extensive perimeter and site landscaping.

A letter from MRGCD to planner Quevedo dated 9/24 states the MRGCD has not approved any changes to the Alameda Lateral and has set many conditions prior to any work commencing.

Policy II.B.5e: **New growth shall be accommodated through development in areas where vacant land is contiguous to existing or programmed urban facilities and services and where the integrity of existing neighborhoods can be ensured.**

Repetitive cost savings

The proposed site is already established and currently houses several Solid Waste Management Department services such as maintenance facilities, administrative building, bin repair, collection truck and employee parking. There are no un-programmed urban facilities or services affecting this site, nor would this be an issue for any future use. This sustainable and resilient facility will allow for the savings of over 2 million miles travelled per year by the collection trucks out to the landfill, decreasing emissions and the carbon footprint. The project will help ensure the integrity of the surrounding industrial neighborhood as well as the City's solid waste management program and improve the efficiency of the system. The savings of $75 million over the next 20 years will delay future waste collection rate increases, and there will be no increase in truck traffic through any residential neighborhoods. This project will enhance and help ensure the integrity of the site's existing industrial neighborhood/area.

Not address industial neighobrs and certainly not residential adjacents.

Policy II.B.5g: **Development shall be carefully de[illegible] features and include trail corridors in the development where appropriate.**

The topographical features of the site, namely grade differences across the site from east to west, will be advantageous to the proposed site grading and drainage design.

Policy II.B.5i: **[illegible] d shall be sited to minir[illegible] ents.**

Buildings could have been bermed in to high areas, also making set backs from Edith & Comanche.

Not true, there are homes and apartments adjacent to the facility.

This is not siting.

Overhead ?

The subject site's location in an already established industrial area and the proposed site development plan will mitigate any adverse effects of noise, lighting, pollution, and traffic on residential environments. The transfer station is enclosed and the operations occur within the building. Use of quick-close doors, air curtains, and air filtration systems will also mitigate noise, odors and particulates from leaving the building. Lighting will be designed to minimize light overspill, further the intent of the State's Night Sky protections, and meet the requirements of 14-16-3-9 of the Zoning Code. The new traffic associated with the proposed ...ment occurs primarily outside of the peak hours (AM and PM), and there will be no increase in truck ...through any residential neighborhoods. The transfer trucks will access the interstate at the Comanche ...erstate 25 interchange. While there are no residential neighborhoods adjacent to the site (closest ...tial neighborhood is approximately 1,300 feet to the west of the project site), landscape and ...cape will be implemented to buffer all adjacent properties and enhance the view of the project from Comanche, Edith and Rankin Road.

Applicant again trying to minimize facility impacts to neighborhoods. **Repetitive.**

"Addendum A" lists **public comments** from www.abqets.com

The only material function to the DATF,was to submit community preference Site Plan D, to mitigate traffic concerns at Edith & Comanche. After a private meeting with Rankin Rd. businesses, and C.O.O. Michael Riordan, the design team perferred design option was rejected. The design team was USED by the City to claim public involvement.

...ve notified the recognized neighborhood associations of the site plan proposal in accordance with the ...eighborhood Recognition Ordinance 92. The project team has had several public meetings over the last ...months (January 20, April 21, and July 15, 2015) to introduce the project, gather ...borhood/stakeholder concerns and input on the redevelopment of the site, and present and discuss the ...sed site development plan. A project website was established for those who haven't been able to ...the public meetings (www.abqets.com). We have also met monthly with a design advisory task force ...up of representatives from the North Valley Coalition, Stronghurst N.A., Near North Valley N.A. and ...er Gardner N.A. to gather further input, discuss their concerns, and collaborate on the redevelopment ...of the site. In addition, the project team participated in a panel session for the North Valley Coalition ...bruary 19th to discuss the project and answer questions from the public.

The submitted redevelopment design, was never presented to design advisory task

...Power 11.8.5K: Land adjacent to arterial streets shall be planned to minimize harmful effects of traffic; livability and safety of established residential neighborhoods shall be protected in transportation planning and operation.

Mid Region Council of Governments, Rate this Intersection as "SEVERLY CONGESTED"

While there are no residential neighborhoods adjacent to the site (closest residential neighborhood is approximately 1,300 feet to the west of the project site), landscape and streetscape improvements will be implemented to buffer all adjacent properties and enhance the view of the project from Comanche and Edith (both are arterials). Because the transfer station is enclosed and the operations occur within the building, any noise concerns will be mitigated. The use of quick-close doors, air curtains, and air filtration systems will also mitigate noise, odors and particulates from leaving the building. The site's established industrial neighborhood/area ...quest and the site development pla...

Refer to submitted independant traffic analysis by Sustainable System Research, LLC. Faulty assumptions.

The new traffic associated with the proposed development occurs primarily outside of the peak hours (AM and PM), and there will be no increase in truck traffic through neighborhoods. The transfer trucks will access the interstate at the Comanche and Interstate 25 interchange and will not enter any residential neighborhoods. With the different types of vehicles and drivers entering and exiting the site, keeping them separate was a focus for the design for both the safety of the public and the efficiency of the transfer station/convenience center operations. Access points and site operations have been designed to separate the public self-haulers and passenger vehicle type visitors from the larger collection trucks and transfer trucks.

Repetitive, attempt to marginalize neighborhood. 2 homes & 7 apartments border the facility.

Creates conflicts for **Complete Streets Ordinance** for many daily users.

Refer to submitted independant traffic analysis by **Sustainable System Research,LLC** Faulty assumptions.

With the implementation of the transfer station and convenience center in this central location, a reduction of approximately 2 million miles travelled per year by the collection truck fleet will be realized along with its associated reduction in carbon emissions, particulates, wear and tear on the vehicles and roadways, and decrease in the number of trucks on Interstate 40 that crosses the North Valley and the Rio Grande travelling to the landfill. The centralized convenience center location will also reduce the miles travelled for the public. The development of the convenience center could save approximately 13 miles roundtrip for each public self-hauler (6.5 miles from the subject site to the Eagle Rock Convenience Center).

This is generally tru of transfer stations, but does not address the cited policy or this site

and innovation in design shall be encouraged in all new development; design shall be appropriate to the Plan area.

s will be state of the art, energy efficient and use the best practices for modern solid acility design. High quality and resilient construction materials will be used.

The proposed design of this redevelopment project is appropriate to the Central Urban and Established Urban Areas because of its much improved quality and innovation for a light industrial use in the site's established industrial setting.

The landscape will be constructed of high quality materials meeting all relevant City of Albuquerque specifications and practices. The irrigation system will use a state of the art controller with point-emitting bubblers to increase irrigation efficiency. Plant materials will be selected for their low water use and aesthetic quality. Mulches and groundcovers will be aesthetically appealing and will be installed over permeable weed barrier to suppress weed growth while preserving soil microbiology and fertility. Finally, passive water harvesting techniques will be employed to supplement potable irrigation water.

Policy II.B.5m: **Urban and site design which maintains and enhances unique vistas and improves the quality of the visual environment shall be encouraged.**

The new buildings and facilities along with landscape and streetscape improvements will greatly improve the visual quality of the subject site's industrial neighborhood/area.

Policy II.B.5o: **Redevelopment and rehabilitation of older neighborhoods in the Established Urban Area shall be continued and strengthened.**

While there are no residential neighborhoods adjacent to the site (closest residential neighborhood is approximately 1,300 feet to the west of the project site), the redevelopment of the site with the new buildings with landscape and streetscape will greatly enhance this older industrial neighborhood/area.

Air Quality

See *Health Impact Accessment* for Air Quality

The Goal is to improve air quality to safeguard public health and enhance the quality of life.

The proposed zone change is not in conflict with this goal and the proposed project furthers this goal as described below.

Repetitive, attempt to marginalize neighborhood. 2 homes & 7 apartments border the facility.

Policy II.C.1b: Automobile travel's adverse effects on air quality shall be reduced through a balanced land use/transportation system that promotes the efficient placement of housing, employment and services.

With the implementation of the transfer station and convenience center in this central location, a reduction of approximately 2 million miles travelled per year by the collection truck fleet will be realized along with its associated reduction in carbon emissions, particulates, wear and tear on the vehicles and roadways, and decrease in the number of trucks on Interstate 40 that crosses the North Valley and the Rio Grande travelling to the landfill. The centralized convenience center location will also reduce the miles travelled for the public. The development of the convenience center could save approximately 13 miles roundtrip for each public self-hauler (6.5 miles from the subject site to the Eagle Rock Convenience Center).

Policy II.C.1c: Traffic engineering techniques shall be improved to permit achievement and maintenance of smooth traffic flow at steady, moderate speeds.

Not applicable

A traffic impact analysis has been completed for the project. Because the new trips associated with the proposed development occur primarily outside of the morning and afternoon peak hour times the Levels of Service (LOS) for the surrounding intersections remain as LOS D. With the routing for the collection trucks already established by the Solid Waste Management Department and the proposed routing for the transfer trucks, there will be no increase in truck traffic through any residential neighborhoods. In addition, the access point on Edith will be shifted south to allow for additional length between the signalized intersection of Comanche and Edith and the Edith driveway, which could help improve the functionality of the signalized intersection.

Policy II.C.1e: Motor vehicle emissions and their adverse effects shall be minimized.

With the implementation of the transfer station and convenience center in this central location, a reduction of approximately 2 million miles travelled per year by the collection truck fleet will be realized along with its associated reduction in carbon emissions, particulates, wear and tear on the vehicles and roadways, and decrease in the number of trucks on Interstate 40 that crosses the North Valley and the Rio Grande travelling to the landfill. The centralized convenience center location will also reduce the miles travelled for the public. The development of the convenience center could save approximately 13 miles roundtrip for each public self-hauler (6.5 miles from the subject site to the Eagle Rock Convenience Center). In addition, the Solid Waste Management fleet meets all tailpipe emissions standards and the site has provisions for the future use of alternative fuels (CNG).

Since no operation plan was submitted, implementation of II.C.1h is not met.

Policy II.C.1g: Pollution from particulates shall be mi
Policy II.C.1h: During air stagnation episodes, activities which contribute to air pollution shall be reduced to the lowest level possible.
Policy II.C.1k: Citizens shall be protected from toxic air emissions.

The proposed project landscape and streetscape will enhance the site, minimize dust and particulates, and the plants and trees will absorb more carbon. The transfer station is enclosed and the operations occur within the building. Use of quick-close doors, air curtains, and air filtration systems will keep odors and particulates from leaving the building. With the implementation of the transfer station in this central location, a reduction of approximately 2 million miles travelled per year by the collection truck fleet will be realized along with its

associated reduction in carbon emissions, particulates, wear and tear on the vehicles and roadways, and decrease in the number of trucks on interstate 40 that crosses the North Valley and the Rio Grande travelling to the landfill. The centralized convenience center location will also reduce the miles travelled for the public. The development of the convenience center could save approximately 13 miles roundtrip for each public self-hauler (6.5 miles from the subject site to the Eagle Rock Convenience Center). The transfer trucks and collection trucks all have covered tops or are enclosed to prevent air polution.

Water Quality
The Goal is to maintain a dependable, quality supply of water for the urbanized area's needs.

The proposed zone change is not in conflict with this goal and the proposed project furthers this goal as des

Significant concern that **cracks in concrete or asphalt floor** will leak, and groundwater will be at some risk. Suggest liners under many areas.

Poli ... **y water supply.**
Policy II.C.2c: Water quality contamination resulting from solid waste disposal shall be minimized.

The site will be designed per the City's Drainage Ordinance and EPA MS-4 permit to manage the first flush and control runoff generated by contributing impervious surfaces. Water quality features, landscaping, ponding areas, and other methods will be used to manage the site's stormwater runoff. With the transfer station being enclosed and all of the operations occurring within the building, the opportunity for garbage to leave the facility and enter the water supply is minimized. The transfer station/convenience center will greatly reduce and help prevent illegal dumping by providing a convenient facility for proper disposal of solid waste, improving recycling efforts, and providing a household hazardous waste drop off site to keep these materials out of the landfill.

Solid Waste
The Goal is an economical and environmentally sound method of solid waste disposal which utilizes the energy content and material value of municipal solid waste.

The proposed zone change is not in conflict with this goal. The economic benefits of implementing the transfer station will greatly enhance the City's solid waste collection and disposal capabilities, making them more efficient, encouraging sustainable practices, recycling (including the diversion of green waste for mulch and compost), and providing an environmentally sound method of solid waste disposal furthering the life cycle of the Cerro Colorado landfill. Best practices, used nationally and internationally, are used for the design of this project. The proposed project furthers this goal additionally as described below.

Policy II.C.3a: Planning and implementation of more efficient and economical methods of solid waste collection shall be continued

There are unmet goals from the **Intergrated Waste Management Plan.** (landfill reduction, reuse, recycle.)

This facility is part of the City's long-term plan to provide more efficient and economical methods of solid waste collection. It has been studied and considered as part of the Solid Waste Management's long term goal since 2006. It will save $75 million over the next 20 years while reducing the carbon emissions in our community equivalent to planting more than 114,000 trees. This will delay rate increases for solid waste services. The operational advantages of the facility designed with national and international best practices, as well as state of the art equipment, will service our ever-growing population for decades to come.

Repetitive and No Justification

Concersions to energy is not addressed.

Policy II.C.3b: Encourage solid waste recycling systems which reduce the volume of waste while converting portions of the waste stream to useful products and/or energy.

City uses "segregation of materials". It is really sorting, which is very labor intensive.

The transfer station and convenience center will improve recycling efforts, including the diversion of green waste for mulch and compost, to benefit our community by keeping material out of the landfill that could be recycled or could be harmful to our environment through the household hazardous waste and the recycling drop off facilities.

Policy II.C.3c: Illegal dumping shall be minimized.
Policy II.C.3f: Continue development of a program for managing hazardous waste generated by households and conditionally exempt small quantity generators.

There is no correlation between a convenience center and the preventation of illegal dumping.

The centralized location of the convenience center w system by providing a low cost, convenient disposal location for the community, and a place for the public to handle their solid waste in a sustainable and environmentally friendly manner. This convenience center will greatly reduce and help prevent illegal dumping in our City. By providing a convenient facility for proper disposal garbage, household hazardous waste items can be disposed of properly and kept out of the landfill and other areas of our City.

See **"Health Impact Accessment"** for Noise as a determinant to health and learning.

Noise
The Goal is to protect the public health and welfare and enhance the quality of life by reducing noise and by preventing new land use/noise conflicts.

The proposed zone change is not in conflict with this goal and furthers this goal as described below.

Policy II.C.4a: Noise considerations shall be integrated into the planning process so that future noise/land use conflicts are prevented.

SWD, Director Soladay has gone on record as saying the noise problem will come from the maintaince facility, not the transfer station. No sound mitigation for maintaince shop.

Noise will be controlled at the sit contain interior noise. Perimeter walls, landscaping, building wall extensions and roof canopies will be used to deflect noise, and building walls will utilize high STC (Sound Transmission Classification) ratings based on mass (i.e. concrete and/or component assemblies including absorptive insulation and building façade materials that absorb sound via perforated panels). The surrounding properties in this industrial area will be buffered by walls and landscape, and no additional truck traffic will enter any residential neighborhoods.

Policy II.C.4b: Construction of noise sensitive land uses near existing noise sources shall include strategies to minimize adverse noise effects.

The plan only calls for noise mitigation **ON-SITE** The projected increase in new traffic with additional ingress and egress to the facility of blue garbage trucks and the new 18-wheelers is a new land use/ noise conflict.

While there are no residential neigh approximately 1,300 feet to the wes implemented to buffer all adjacent properties and enhance the view of the project from Comanche and Edith. The transfer station is set back from the property lines and placed in the middle of the property to further the buffer between the adjacent properties.

Repetitive, attempt to marginalize neighborhood. 2 homes & 7 apartments border the facility.

Developed Landscape
The Goal is to maintain and improve the natural and the developed landscapes' quality.
The proposed zone change is not in conflict with this goal and will further this goal by redeveloping an old and unattractive site with a state of the art, energy efficient and aesthetically pleasing facility. The quality of the building along with the landscape, streetscape, and perimeter walls will enhance the industrial area and the adjacent neighbors' views. This goal is furthered additionally as described below.

Policy II.C.8a: The natural and visual environment, particularly features unique to Albuquerque, shall be respected as a significant determinant in development decisions.
Policy II.C.8b: Public facilities (including buildings, parks, plazas, utilities, bridges, streets, stadiums, and airports) shall be designed to realize opportunities for City/County beautification.
Policy II.C.8d: Landscaping shall be encouraged within public and private rights-of-way to control water erosion and dust, and create a pleasing visual environment; native vegetation should be used where appropriate.

The existing site is an industrial area and is visually unappealing with very little vegetation. While the topography of the area currently negates most views externally, the placement of the tallest building in the middle of the site will allow for buffering and enhancement of the site and the visual environment by perimeter walls, landscape, and streetscape. The public facility will be designed to be visually appealing as well as functionally efficient. The landscape will help to screen the facility, creating a more visually appealing condition than exists at the current facility.

The landscape will be low [illegible] ***on. A variety of native tree and shrub spe*** [illegible] ***e selected for low water requirements, per t*** [illegible] ***-allergen plants will be used.***

Edith still maintains part of its historic character as does Griegos. The Facility furthers the erosion of the unique charachter of those streets and districts.

Community Identity and Urban Design
The Goal is to preserve and enhance the natural and built characteristics, social, cultural and historical features that identify Albuquerque and Bernalillo County sub-areas as distinct communities and collections of neighborhoods.

Edith? Comanche? Streetscapes?

The proposed redevelopment will not detract from the characteristics of the site's distinct, industrial urban area, and will only enhance the area with improved design and landscaping.

There will be an increased burden on the areas' low-income, minority population. This area is already over-burdened with environmental threats.

II.D. Community Resource Management
Service Provision
The Goal is to develop and manage use of public services/facilities in an efficient and equitable manner and in accordance with other land use planning policies.

The development of this project has been underway since 2006, and the purpose is to integrate solid waste management best practices, increase operational efficiency, and provide sustainable methods for solid waste collection and transport. The new state of the art, energy efficient, aesthetically pleasing facility will only enhance the site's industrial area. The proposed convenience center will provide a new location to more

The public was not involved until mid-2014. There were already 8 years of City planning and site selection without public involvement. .

conveniently and equitably serve the City's residents (the nearest convenience center, Eagle Rock, is 6.5 miles away).

Energy Management
The Goal is to maintain an adequate, economical supply of energy through energy management techniques and use of alternative and renewable energy sources.

Through this project, the City will save over 2 million miles of travel per year by collection trucks, and reduces fuel use and the City's emissions/carbon footprint. This translates into saving Albuquerque taxpayers/ratepayers $75 million over the next 20 years. By optimizing the operations of the solid waste collection system, recycling will increase and the life cycle of the Cerro Colorado landfill will be extended. Provisions for the future use of alternative fuels, such as CNG, will be programmed into the design of the site. The project will also repla ady buildings.

Applicant does not in any way demonstrate "energy management techniques". Instead, repetitive "cost savings"

Transportation & Transit
The Goal is to develop corridors, both streets and adjacent land uses, that provide a balanced circulation system through efficient placement of employment and services, and encouragement of bicycling, walking, and use of transit/paratransit as alternatives to automobile travel, while providing sufficient roadway capacity to meet mobility and access needs.

This project will provide for efficient placement of public facilities and services. There is sufficient roadway capacity on the adjacent arterial streets to accommodate the proposed uses. The proposed zone change is not in conflict with this goal and furthers this goal as des

Project will not spend any resources out side their boundaries. Bikers and walkers will have to fight off trucks where they cross. **Does not meet the stated goal.**

Policy II.D.4o: Peak hour demands on the circulation sys

The new traffic associated with the proposed development occurs primarily outside of the peak hours (AM and PM) and the surrounding intersections will continue to operate at a LOS D. In addition, there will be no increase in truck traffic through any neighborhoods

Housing
The Goal is to increase the supply of affordable housing; conserve and improve the quality of housing; ameliorate the problems of homelessness, overcrowding, and displacement of low income residents; and assure against discrimination in the provision of housing.

Irrelevant citation.

This goal is furthered by the implementation of a convenience center to service more of the citizens, and the facility will not increase truck traffic in any residential neighborhoods. Because this project will help forestall increases in solid waste fees, citizens may realize more income to address housing needs.

Very weak justification

Economic Development
The Goal is to achieve steady and diversified economic development balanced with other important social, cultural, and environmental goals.

Clever, but very weak justification

Because this project will help to forestall increases in solid waste fees, ratepayers may realize more income to support economic development. The environmental benefits resulting from this project will improve the City's quality of life and enhance economic development. The proposed zone change is not in conflict with this goal and it is furthered as described below.

Irrelevant to this site.

Policy II.D.6e: A sound fiscal position for local government shall be maintained.
Policy II.D.6f: The City and the County should remove obstacles to sound growth management and economic development throughout the community.

Repetitive "cost savings" Can in no way predict delay in rate increases.

Through the savings of over 2 million miles traveled yearly out to the landfill by the collection trucks, the City will save $75 million over the next 20 years. This would help keep rates the same for solid waste services and delay rate increases, provide sustainable City government and services, and this would allow the City to focus on other investments in our infrastructure and services. By implementing a sustainable and resilient service, the City will have an advantage to withstand and better address future environmental and market changes.

Education
The Goal is to provide a wide variety of educational and recreational opportunities available to citizens from all cultural, age and educational groups.

Policy II.D.7e: Variety and flexibility in educational and recreational resources shall be encouraged through joint use of facilities.

The proposed zone change is not in conflict with this goal and it is furthered as described below.

The proposed redevelopment will serve as an educational resource with a new comprehensive education/outreach program and the current Keep Albuquerque Beautiful program for youth, residents, and businesses that encourage sustainability through waste reduction, recycling (including the diversion of green waste for mulch and compost), and other diversion methods. The building plans include a fully enclosed viewing area of the waste transfer operations where the community will be invited to learn firsthand how much waste is generated in Albuquerque, and how it is managed.

North Valley Area Plan (Rank Two Plan)
The North Valley Area Plan was adopted in 1993 and was prepared to guide future development by addressing general land use, zoning, air quality, wastewater, drainage, transportation, housing, community design, agriculture and implementation.

The proposed zone change is not in conflict with goals, issues nor policies of the North Valley Area Plan. It will help further these goals, issues and policies as described below.

Goals and Issues:
1. To recognize the North Valley area as a unique and fragile resource and as an inestimable and irreplaceable part of the entire metropolitan community.

Repetitve. There is little correlation between a convenience center and the preventation of illegal dumping.

The proposed zone change will further this goal by protecting the North Valley area as a resource. The transfer station and convenience center will discourage illegal dumping by providing a convenient location for North Valley citizens to haul their garbage, recyclables and household hazardous waste. A reduction of approximately 2 million miles travelled per year by the collection truck fleet will be realized along with its associated reduction in carbon emissions, particulates, wear and tear on the vehicles and roadways, and decrease the number of trucks on Interstate 40 that cross the North Valley and the Rio Grande travelling to the landfill. It will further protect the Alameda Lateral and its water by providing better access to the lateral for MRGCD maintenance, stabilizing slopes, and providing landscape buffer between the site and the lateral. In addition, the transfer station is enclosed and the operations occur within the building. Use of quick-close doors, air curtains, and air filtration systems will also mitigate noise, odors and particulates from leaving the building.

2. To preserve and enhance the environmental quality of the North Valley by:
   a. maintaining the rural flavor of the North Valley
   b. controlling growth and maintaining low density development
   c. providing a variety of housing opportunities and life styles including differing socioeconomic types
   d. reducing noise level impacts

The proposed zone change will further this goal by redeveloping the outdated facilities into a state of the art, energy efficient and aesthetically pleasing public facility that will enhance the industrial area in which it resides. The transfer station is enclosed and the operations occur within the building. Use of quick-close doors, air curtains, and air filtration systems will also mitigate noise, odors and particulates from leaving the building.

3. To preserve air, water and soil quality in the North Valley area. To prohibit hazardous waste disposal sites and transfer stations and solid waste disposal sites; and to address problems of individual waste disposal systems on lots of inadequate size.

#3 Correct ! Prohibit transfer stations !

The proposed zone change will further this goal with a reduction of approximately 2 million miles travelled per year by the collection truck fleet that will be realized, along with its associated reduction in carbon emissions, particulates, wear and tear on the vehicles and roadways. The project will result in a decrease in the number of trucks on Interstate 40 that crosses the North Valley and the Rio Grande travelling to the landfill. Water quality infrastructure will be implemented with the project to further protect the area's water resource.

Per City Council Resolution 60-1993, Solid Waste Transfer Stations shall be allowed in the North Valley Plan area only on land zoned for manufacturing uses and only if, after thorough investigation of relative benefits and costs, such location is deemed appropriate and the potential impacts on adjacent residential land can be mitigated through proper site design. The site is currently zoned M-1 for manufacturing uses and through an investigation of benefits and costs, was found to be the best central location for the transfer station. While there are no residential neighborhoods adjacent to the site (closest residential neighborhood is approximately 1,300 feet to the west of the project site), landscape and streetscape will be implemented to buffer adjacent

While there is language in the North Valley Area Plan, that same area plan includes a recommendation from a 100-member advisory team that there be NO TRANSFER STATION. This is another example of community recommendations not being followed
Choice based benefits & Costs.

Need liners under many risk areas.

5. To reduce or eliminate flooding and improve ponding and drainage capacities in the plan area.

The proposed zone change will further this goal by designing the site per the City's Drainage Ordinance and EPA MS-4 permit which will manage the first flush and control runoff generated by contributing impervious surfaces. Water quality features, landscaping, ponding areas, and other methods will be used to further manage the site.

6. To encourage quality commercial/industrial development and redevelopment in response to area needs in already developed/established commercial industrial zones and areas. To discourage future commercial/industrial development on lots not already zone commercial/industrial.

The City's population continues to grow and there is more demand for services. This redevelopment of the existing Solid Waste Management site is in response to our ever-growing population and the sustainable methods needed to maintain services. As part of an existing industrial area and currently zoned M-1, the site's location is ideal for this modern public facility.

7. To develop a strategy for arterial roadways that creates a transportation system compatible with a semi-rural lifestyle.

Takes Edith and Comanche further from a semi-rural.

The site's area and the adjacent arterial roadways are in an industrial area.

9. To establish area beautification standards and designate sites for beautification through community neighborhood input.

Irrelevant response.

The proposed zone change will establish beautification standards through the site plan approval. We have notified the recognized neighborhood associations of the site plan proposal in accordance with the City Neighborhood Recognition Ordinance 92. The project team has had several public meetings over the last eight months (January 20, April 21, and July 15, 2015) to introduce the project, gather neighborhood/stakeholder concerns and input on the redevelopment of the site, and present and discuss the proposed site plan. A project website (www.abaets.com) was established for those who haven't been able to attend the public meetings. We have also met monthly with a design advisory task force made up of representatives from the North Valley Coalition, Stronghurst, and Greater Gardner to gather further input, discuss their concerns, and collaborate on the redevelopment design of the site.

11. To locate commercial and industrial development within the I-25 corridor, and selected areas along the I-40 corridor, especially as an alternative to extensive lower valley commercial/industrial development.

The proposed zone change will allow for the redevelopment of this industrial site within the I-25 corridor, and it will remain approximately 1,300 feet from the nearest residential neighborhood and further away from the lower valley.

12. To develop incentives to preserve farmland and open space and to maintain ditches and acequias for agricultural and low-impact recreational purposes.

The project would enhance and protect the Alameda Lateral that runs along the west side of the property by improving MRGCD access, stabilizing slopes and protecting water quality.

Plan Policies
Zoning and Land Use:
1. The Comprehensive Plan area boundaries shall reflect existing character, resources and development potential in the North Valley.

The outdated facilities will be redeveloped into a state of the art, energy efficient and aesthetically pleasing public facility that will enhance the industrial area in which it resides.

Air Quality:
No specific policy is applicable to this development, but the proposed development will improve air quality as follows:

With the implementation of the transfer station in this central location, a reduction of approximately 2 million miles travelled per year by the collection truck fleet will be realized along with its associated reduction in carbon emissions, particulates, wear and tear on the vehicles and roadways, and decrease in the number of trucks on Interstate 40 that crosses the North Valley and the Rio Grande travelling to the landfill. The centralized convenience center location will also redu[illegible] e site, the implementation of the convenience center w[illegible] approximately 13 miles roundtrip for each public self[illegible] Convenience Center and Edith Transfer Station).

A letter from MRGCD to planner Quevedo dated 9/24 states the **MRGCD has not approved any changes to the Alameda Lateral and has set many conditions prior to any work commencing.**

Drainage:
No specific policy is applicable to this development, but the proposed development will further drainage policies by protecting the Alameda Lateral and its water by providing better access to the lateral for MRGCD maintenance, stabilizing slopes, protecting water quality, and providing landscape buffer between the site and the lateral.

The site will be designed per the City's Drainage Ordinance and EPA MS-4 permit and will manage the first flush and control runoff generated by contributing impervious surfaces. Water quality features, landscaping, ponding areas, and other methods will be used to manage the site and prevent erosion.

What protects groundwater.?

Transportation:
1. The City and County shall encourage the smooth flow of traffic on arterials....
2. The City and County shall actively promote sustainable transportation in and through the plan area by encouraging reduced automobile use and improving the safety of non-motorized travel....
3. The City and County shall limit industrial and heavy commercial traffic through residential areas in order to enhance residential stability and preserve area history and character....

The proposed zone change is not in conflict with these policies and they are furthered as described below.

A traffic impact analysis has been completed for the project and because the new trips associated with the proposed development occur primarily outside of the morning and afternoon peak hour times the Levels of

Sustainable Systems Research, LLC . There are faulty assumptions in the City's Traffic Study.

Service (LOS) for the surrounding intersections remain as LOS D. With the routing for the collection trucks already established by the Solid Waste Management Department and the proposed routing for the transfer trucks, there will be no increase in truck traffic through any residential neighborhoods. In addition, the access point on Edith will be shifted south to allow for additional length between the signalized intersection of Comanche and Edith and t f the signalized intersection.

In fact, however the proposed expanced use will have a deleterious effect on traffic in the area.

With the implementation of the transfer station in this central location, a reduction of approximately 2 million miles travelled per year by the collection truck fleet will be realized along with its associated reduction in carbon emissions, particulates, wear and tear on the vehicles and roadways, and decrease in the number of trucks on Interstate 40 that crosses the North Valley and the Rio Grande travelling to the landfill. The centralized convenience center location will also reduce the miles travelled for the public. For those near the site, the implementation of the convenience center will save approximately 13 miles roundtrip for each public self-hauler (6.5 miles each way between Eagle Rock Convenience Center and Edith Transfer Station).

Community Design:

The applicant has failed to demonstrate how a different use category would be more advantageous to the community

pment, but the proposed development will improve aesthetics of area that it resides in.

t the existing zoning is inappropriate because:

- There was an error when the existing zone map pattern was created.
- Changed neighborhood or community conditions justify the change.
- A different use category is more advantageous to the community, as articulated in the Comprehensive Plan or other City master plan, even though (1) or (2) above do not apply.

Weak justification

The existing zoning is inappropriate because changed community conditions justify the change. The City's population continues to grow and there is more demand for services. With budgets and resources continuing to shrink, the City has to become more nimble and efficient in providing services. By the implementation of a transfer operation for solid waste, the program will become more sustainable and help in conserving resources.

True City wide, but Valley use of Comanche & Edith remain sensitive.

As discussed in item (C) above, this new zoning in an already established industrial area is more advantageous to the community, as articulated in the Comprehensive Plan and the North Valley Area Plan.

(E). A change of zone shall not be approved where some of the permi harmful to adjacent property, the neighborhood or the community.

See **Health Impact Assessment** on how the project would be deleterious to the community at large, and specifically to low-income minorities in the area.

The proposed zone change will be beneficial to the adjacent properties community by providing landscape buffers and streetscape; by stabilizing the land use with the approval of a site development plan for the property; implementing a state of the art, energy efficient, aesthetically pleasing facility that enhances the industrial area it resides in; improved access; water quality infrastructure, and the convenience center for the public. In addition, the facility will not increase truck traffic in any residential neighborhoods.

Applicant has made no effort to mitigage concerns with local business, Maloy Storage, American Marine, Conway Electric. This will be harmful to adjacent property. SWD has been a bad neighbor for over 30 years. A new facility will neither improve attitudes nor behavior.

(F). A proposed zone change which, to be utilized through land development, requires major and unprogrammed capital expenditures by the City may be:

1. Denied due to lack of capital funds, or;
2. Granted with the implicit understanding that the City is not bound to provide the capital improvements on any special schedule.

The City has been planning for this project for many years, and the proposed zone change will not require any unprogrammed capital expenditures on the part of the City. The Solid Waste Department is an enterprise fund program, and the redevelopment of this site and any necessary infrastructure will be funded by revenue bonds.

Earlier discussions centered on **"satellite" transfer stations** for further savings.

(G). The cost of land or other economic considerations pertaining to the applicant shall not be the dete

West side population does not support **"must be in a central location to the City"**

Owning the land" and cost savings been offered repeatedly as a good reason for the site selection. However, this is in conflict with G.

City does own the property of the proposed development, the cost of land or other economic tions are not the determining factor. In order to service the needs of the community in an efficient the location of the transfer station must be in a central location to the City, have convenient and access to the interstates, and be on a property large enough to house the building and all of its site n and access needs. This location meets all of these requirements.

tion on a collector or major street is not in itself sufficient justification of apartment, office or cial zoning.

e location of the proposed development is on major streets, that is not in itself the justification for est. In order to service the needs of the community in an efficient manner, the location of the transfer station must be in a central location to the City, have convenient and efficient access to the interstates, and be on a property large enough to house the building and all of its site circulation and access needs. This location meets all of these requirements.

(I). A zone change request, which would give a zone different from surrounding zoning to one small area, especially when only one premise is involved, is generally called a "spot zone."
Such a change in zone may be approved only when:

1. The change will clearly facilitate realization of the Comprehensive Plan and any applicable adopted sector development plan or area development plan, or;
2. The area of the proposed zone change is different from the surrounding land because it could function as a transition between adjacent zones; because the site is not suitable for the uses allowed in any adjacent zone due to topography, traffic or special adverse land uses nearby; or because the nature of structures already on the premises makes the site unsuitable for the uses allowed in any adjacent zone.

The proposed zone change is a spot zone, and it does clearly facilitate the goals and objectives of the Comprehensive Plan and the North Valley Area Plan as described in item (C).

(J). A zone change request, which would give a zone different from surrounding zoning to a strip of land along a street, is generally called "strip zoning." Strip commercial zoning will be approved where:

We believe he applicant has not proved how they will facilitate their goals and objectives.

The change will clearly facilitate realization of the Comprehensive Plan and any applicable adopted sector development plan or area development plan, or;
The area of the proposed zone change is different from the surrounding land because it could function as a transition between adjacent zones or because the site is not suitable for the uses allowed in any adjacent zone due to traffic or special adverse land uses nearby.

This requirement does not apply to this request. This would not become a strip zone.

Conclusion
This request for approval of a Zone Map Amendment and Site Development Plan for Building Permit meets the intent and furthers the intent, goals and policies of all the applicable criteria and policies for this request and the area including Resolution 270-1980, the Comprehensive Plan, and the North Valley Area Plan.

Declaritory ruling or something else?

The existing M-1 zoned site does not currently have a site development plan, so the existing facility could remain and add more M-1 uses without a review process. Through approval, the request will enhance and help ensure the integrity of the site's existing industrial neighborhood/area.

Should you have any questions or need any other information regarding this matter, please do not hesitate to contact me at 505.348.4018 or via email at Savina.Garcia@wilsonco.com.

Sincerely,

Savina G. Garcia, PE
Wilson & Company, Inc., Engineers & Architects

Enclosures

Cc: Jerry Francis, COA DMD
Clark Davis, JRMA
File 1410013200

ADDENDUM 1

Public Comments Received at web site: www.abqets.com for Edith Transfer Station

Comments through 9/25/2015

Submitted to Environmental Planning Commission, Peter Nicholls, Chairman

Written comment to Mayor Richard J. Berry expressing concern about waste transfer station and requesting that a meeting be scheduled between the City and surrounding businesses to discuss the project and how its impacts can be mitigated.
—Wes Bigney, Sysco Foods of New Mexico

I am a nearby property owner and would like to look at the proposed new construction plans for the Edith transfer station. Do you have them available in a pdf file that you can send me or can I come to your office and view them before the Jan. 20, 2015 meeting to be able to make knowledgeable comments. Let me know please.
— Jeff Henry

I have several serious concerns along with some small ones concerning this transfer station. I own property abutting the city yards now. Over the years we have had to make several changes in our operation because of the city yard. One of the biggest ones is the diesel soot that came into my building when we use a swamp cooler. All are ceiling tiles have black lines all the way around them as air pushes out around them from the cooler. We changed to refrigerated air to correct the problem, but adding all that diesel soot by the unloading and the tractor-trailers loading up and leaving, will make this air very polluted and affect the health of our employees. The other problem will be with the garbage laying around. We will have an increase of pigeons. The pigeons have been so bad that we had to remove all our landscaping in front of our offices because the pigeons use it to roost and went to the bathroom all over the place causing a possible health problem. The other thing is the increased truck traffic on Comanche will make that exit very hard to use. There is a lot of truck traffic from businesses along Comanche including I-25. Sometimes the line to get on I-25 backs up for 4 or 5 light changes. Business traffic and personal traffic from South of Menual use this access to get onto the interstate system for both I-25 and I-40. Also the southbound ramp of I-25 to get to I-40 is a fairly steep grade which makes it very slow for tractor-trailers. They will reach the top of the grade and may be going 30 plus miles per hour and then the lighter traffic will try to cut around them which will create a dangerous situation on the 65 mile per hour road. This is already happening to some extent. What makes this bad is when the Big I interchange was redone, a lot of exits were closed so there is not one for the Candelaria and Menaul area anymore. All that traffic has moved over to Comanche. I believe moving the transfer

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station somewhere else would be better for our health and keep a safe entrance to the interstate system.
—Guy Conway

My concerns:

1. Additional traffic from return visits of garbage trucks during each day.

2. Additional traffic from citizens bringing their own trash – it doesn't seem that our streets can handle the extra traffic.

3. For trash that falls out along the streets as citizens drop off their trash; how will that be managed so that we don't have loose trash over the neighborhoods.

4. How will Griegos going on to I-25 handle this traffic? At 8:00 am there is already a huge line. I have to wait 3 or 4 lights to get onto I-25 now. What will happen when all the extra traffic is added?
—Shirley Arrellano

Concerned about condition and maintenance of roads, traffic backup at interstate, increased fumes with traffic idling at on ramps, especially during ?? times. Is savings from fuel and maintenance going toward purchasing natural gas trucks? In budget decision, is road up-keep being considered? Concerned about air quality which is already compromised at asphalt plant and cement plant.
—Susan Garriott

How many of the other transfer stations are built in established residential neighborhoods such as this? How are you going to control the traffic going in and out of the transfer station? It can be pretty heavy as it is. How will the noise and odors be controlled?
—Yolanda Gradi

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Anybody who don't live within a 1 mile radius really don't care about this issue! As a resident of the area for 50 years, I have seen several changes to our neighborhood involving commercial business expanding not caring about the health and well-being of residents. Within ½ mile area, asphalt plant, cement plan, odors, traffic, graffiti, property damage, etc. Anybody who wants this in their neighborhood should ask the City to place stations in their area and live with noise, odor, traffic, rodents, etc. Paseo del Norte completion won't help ease traffic and noise issues. "Bad Idea" A Fight and or petition will be done to keep the City's Solid Waste garbage away! Look out!
—Dan Martinez

I wonder about trucking routes for the transfer station trucks.
—Karen McSorley

1. Why here? Economics aside.

2. What are you going to do about trash being brought in pickup trucks (with or without tarps)?

3. What about noise?

4. Traffic?

5. Take out convenience center.
—Diana Rebelledo

I attended the 20 Jan meeting at the NV Sr Citizen Cntr. Items the design team should take into account:

1. Consider peak loads for employee vehicles, garbage trucks, transfer trucks and convenience drop-off user vehicles.

2. Pollution in irrigation lateral.

3. Site lights for vehicle exiting the site for oncoming autos and bicycles.

ADDENDUM 1

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4. Effective but low impact signage for facility.

5. Consider solid low fencing with open fencing above so that trash trapped against fence is not visible but site lines are not completely obscured.

6. Site exist[s] as far from traffic lights as possible.

7. Effective left turn control mechanisms or no left turns at all.

8. Effective traffic flows that separate different types of visitors, i.e., those going to the admin offices, recycle drop off, hazardous waste drop-off, public garage drop-off, garbage trucks, transfer trucks, employees, service traffic (fuel trucks, contractors, mechanics, other support and suppliers.

9. Solar and wind power generation.

10. Waste water usage for landscaping and other appropriate uses if possible.

11. Partnership with PNM for possible natural gas usage.
—Leroy Romero

The amount of truck traffic going onto and off I-25 at Comanche could make that busy intersection a real bottleneck and safety hazard for regular traffic. I suggest that you include in your budget re-vamping of the I-25/Comanche intersection to avoid serious problems.
—Doug Spence

I am a North Valley resident protesting the Project. I have a lot of concerns.
—Richard Trujillo

ADDENDUM 1

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Why not have multiple, smaller stations placed around the city rather than dump all the garbage in our middle-class part of town
—Anonymous

Cement plant can go 24/7 with railroad – 3 blocks from possible transfer station.
—Anonymous

Owner – Royal Plumbing and Heating

1. What is going to happen at the back side of the property along Rankin Road. Is the chain linked fence going to stay up, or will a block or metal wall take its place?

2. Will there be enough room on the site to openly accommodate the Saturday and Sunday traffic, or will the traffic line spill out into the surrounding area (major streets) Candelaria and Edith?

3. What will happen with the rain water that flows towards Rankin Road?
—Mark Hosington, owner, Royal Plumbing & Heating

ya' know, I think that area stinks enough just with the garbage trucks being housed there empty.
—Vincent *Amendolagine*

I have 3 comments: I am fine with the transfer station if it is used only by the garbage trucks and they only use Griegos/Comanche entrance. I am not fine for the general public's use because that means loads of traffic into that area. I also am concerned about environmental quality. We already have the cement plant and recycling center close.
—Beth Brownell

I am writing in regards to the proposed waste transfer station at 4600 Edith NE. I am a north valley resident and stakeholder. First and foremost it's a terrible location and it doesn't pass the age old 'smell test', figuratively or literally. But more importantly it will negatively affect traffic, transportation, quality of life, noise and air quality in the north valley. The following points will be expanded upon during the appropriate forums in the near future but it's safe to say that city and

ADDENDUM 1

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your firm will face an uphill battle trying to sell this project without adequately addressing some very legitimate points as follows:

• Traffic egress from the north valley to Interstate 40 – Currently there are two (2) optimal routes to get to I-40 from the intersection of Griegos and Rio Grande. One is to go south on Rio Grande or east on Griegos. Rio Grande will soon be inhibited by a single lane round-about which will decrease easy access, and by all previous engineering studies will be ineffective due to its single lane construction. A two lane round-about would work but is not possible due to the private properties on all four corners but the County Commission is moving ahead anyway. And now Griegos/Comanche is going to be backed up with refuse trucks and 18 wheeled trash haulers all day long. And Mr. Riordan at the city calls this his selling point? That the traffic will only be between Edith and the freeway ramp on Comanche? That's our only way out of the valley! If this is a 'transfer station' for residents it will also be accepting residential trash and debris which will cause an uptick in residual neighborhood traffic, pollution, litter, and homemade trash trailers. That has not been addressed yet.

• We have an inversion problem in the valley during the winter months where smog gets trapped. The daily use of front end loaders, 18 wheeled semi-trucks hauling trash to the landfill, the private vehicles and the refuse trucks are going to add to the pollution problem.

• Pedestrian and Bicycle traffic – There is a bicycle lane each side of Comanche which is going to be seriously affected by the aforementioned activity. There have already been two deaths and another major accident on Comanche involving cyclists and vehicles; once including a refuse truck. As a community we need to enhance and improve our bicycle paths and safety, not propose development that will make it worse. This is just another example of this development being proposed in the wrong geographic area of our city.

• Developmentally, geographically and environmentally it's just a bad idea. These sort of developments are typically situated in an area of dense industrial developments, not at the crossroads of residential neighborhoods and non-industrial sites. If your purpose is to change the neighborhood demographics to an industrial site, you should transparently state as much. There are historic properties adjacent to the site, there are flood control arroyos, some pedestrian pathways, bicycle lanes, and residential areas that require respect and preservation; not wanton disregard to quality of life issues to the area's residents.

—Chet Karnas

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1. There are already two large recycling plants close-by. Why do we need another one?

2. If private dumping will be allowed here, there will be a huge increase in traffic to our area. How will this reduce air pollution? Will public dumping be allowed on weekends?

3. The current bike lane on Griegos is very dangerous for bicyclists. Several have been killed along that route, including one run over by a garbage truck. There is no question that there will be a huge increase in traffic to and from the transfer station by large trucks and private dumpers. What will be done to protect bicyclists on this route?

4. Comanche/Griegos is an important east/west route for residents living near and west of 4th St. During rush hour (am and pm) there is often traffic congestion/gridlock between the Fwy and 4th St. because of the train crossing and the slow school zone. How can additional traffic to the transfer station not make this worse? Thank you.
—Jill Gatwood

Certainly the city has, or can acquire, the land for a transfer station southwest of the city. The corner of Edith and Griegos is NOT where it should go. Please put it where it has the least impact on residential neighborhoods. Thank you.
—Kristina Anderson

Hello, I attended last week's meeting about the Waste Transfer Station project. I agree with those who are opposed to this project and also want answers to the questions that were raised. My own questions and concerns are as follows:

• One of the reasons given for using this plot of land is that the city already owns it. So what? It could be SOLD for a more suitable development project and the proceeds used to purchase a more appropriate site.

• Many people are concerned about the increase of traffic. Has the city forgotten they've already increased traffic in this neighborhood with the North Fourth Development projects? Enough is enough!

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• I have heard no mention of the expense of wear and tear on the road itself. Griegos/Comanche is a main thoroughfare already. These huge trucks will impact the road surface negatively, resulting in more ongoing road maintenance. Is this included in cost estimates? Road maintenance routinely causes traffic jams.

• Saving city money at the expense of individual property owners is no real savings. Our property values will plummet with the realization of this project.
—Carol Chamberland

I live in the area and feel that this is something that should not be built in the city. I'm sure you could find an acceptable site in a non-residential area. The North Valley could use that site for so many more things. Parks, Pools, Health Center, Community Center, Head Start Centers. There is surely someplace else much less residential for garbage.
—Mary Tuttle

I am opposed to the proposed transfer station at Edith and Griegos.

1. It will increase the already high pollution in the area with the added exhaust from truck, dump trucks and other vehicles.

2. It will increase traffic on an already congested road, Griegos by both City trucks and personal vehicles.

3. It will bring hazardous waste dumping to a fragile environment. There is already a site for hazardous waste drop off. Extend the times people can bring things there.

4 The head of waste management stated at the Jan. meeting that the green waste and recyclables will be separated at the site and that that already happens at the other sites such as Eagle Rock. I have witnessed more than six times that the waste that people bring in is all combined and put into trucks. A big front loader pushes it all together to the end of the building loading it all into trucks. It is not separated and I believe the same will hold true at the proposed site.

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5. What is needed is to reduce the amount of all overall trash. A simple and economically feasible alternative it for the city to collect green waste in separate containers.

6. It was stated a number of times that the city wants to clean up the current site and having the transfer station there would cause that to happen. It needs to be cleaned up regardless of what does or does not happen. It needs to be cleaned up now. The City should have done this before and you have the opportunity to do it now.

7. It is an unnecessary expense for the taxpayers, what is desired can be achieved in easier, neighborhood friendly, and environmentally friendly ways.
—Denise Wheeler

1. As property values in the North Valley decline how will the City help reduce property taxes. Don't forget the North Valley pays the highest mill rate in NM.

2. The Greater Gardner neighborhood already exceeds EPA particulate standards by 50%. How will the additional particulate load be managed?

3. At what times/location/day of week will particulates be measured and published.

4. The Comanche bike lane has become unsafe. A cyclist has already been squashed by a garbage truck. What effects will more & larger garbage trucks have on cyclists? The bike lane under I25 is gone. What alternatives are going to be put in place for cyclists, our cleanest commuters?

5. How will rodents, mosquitos, flies, & unwanted birds be addressed?

6. Is there a plan to prevent toxic chemicals & medical waste from transport through our neighborhoods?

7. What improvements, at what taxpayer cost, will be required at Comanche/I25?

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8. What additional cost will be incurred by taxpayers for damage to I25/I40 & Comanche with the heavy loads transported?
—Name not available

I have lived in the Greater Gardner Addition for over 29 years, a mile away from the Edith Solid Waste Facility. I have some strong objections to the proposed transfer station. The main one being the impact on the roadways – Comanche between Edith and I25 and the Big I. You could put a building to rival the Taj Mahal, but that will in no way compensate for the additional traffic and having semis on city streets. I frequently travel these routes and am very troubled by the prospect of the future scenario. Also, I believe the traffic situation will deter people from coming into our neighborhood negatively impacting the local businesses, among them valley treasures like Bookworks and the Flying Star on Rio Grande Blvd. I am also disturbed by the fact that trash will be transported from the west side across the river on I40 and then back across the bridge. The corner of Edith and Comanche where the solid waste station is located has always been an eye-sore and an embarrassment to me when having visitors from other parts of the city or from out of town. It has been an indication to me of how little regard the city has for this part of town. This proposed plan is just another example. Are the costs of infrastructure improvements including in total cost? I would really like to see the project be scaled down. Thank you for hearing my voice.
—Irene Walkiw

Concerning the proposed waste transfer station: It is clear that the project is likely to be a great aesthetic improvement over the current condition of the site, and that it is likely to be beneficial for the city as a whole. It seems much less certain that it would be beneficial for the neighborhood surrounding the project. After watching the video of the first 90 minutes of the public meeting about 2 weeks ago, I have two questions.

1. The presentations by city staff and the design team seem to assume that the project will be built. Are there any plausible conditions under which the project would not be built? What are the most serious impediments to approval of the project?

2. The man who owns a home and business on the east side of Edith adjacent to the site made a brief statement that he opposes the project. I have participated in meetings discussing potential objections to the project. He has showed photos of serious trash problems on his property, stated that the trash blew in from the current site, and stated that reporting this

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problem to site managers drew the response that they had no responsibility to clean up the trash and that cleanup was his problem. With this kind of attitude, what assurance does the neighborhood have that transfer station management would work with neighbors to resolve problems that may occur?
—John Karon

Should not be done at this location but relocated to the SB frontage road along I25 This site is too busy and will be having conflicts with local traffic and bike use on a critical e-w bike connection.
—Stephen Verchinski

I went to the Edith Transfer Station meeting thinking bicyclists really didn't have much at stake in this one. After a couple weeks talking to people and digesting/contemplating what I heard, I have a feeling that this is a much bigger deal for bicycle travel in inner North Valley and between NE and NE ABQ than I thought.

Before I get into my specific concerns I should say that I fully support some sort of transfer/recycling facility (perhaps multiple) and think we should have made something happen a long time ago. That said, I am not so sure that this is the best location or that enough care was taken to assess ancillary impacts during the site selection process. In that vein, I would like much more specific site selection information with regard to site selection goals and specific criteria used in researching and evaluating sites. Ideally this would include the rationale for the two sites considered but not selected. Further, because of the significant impact this project will have on surrounding neighborhoods and Griego/Comanche to wherever trucks will get back on to head to landfill (I-40?), I think it is very important that CABQ be completely transparent in why other logical sites were not considered. Specifically, sites south of Big I on i-25 and 12th and i40 at either the Indian School or Prager Station/Ponderosa Products areas (seems logical as much easier and practical off/on Interstate, less street travel required and even more conveniently located central locations). Also, 12th is not designated bicycle facility and Griegos is, with two ghost bikes including one from Garbage Truck.

To understand my major concerns (it's a very big one because of the huge impact this project will have on area roads with increased heavy truck volume) you/someone will need to drag out 2000 on-street bike plan, MRCOG AMPA Long Range Bicycle Facility Map, Draft of Bike and Trails Plan Update (specifically maps, programmed and critical links project tables) currently being considered at LUPZ, and the 2014 Albuquerque Bicycle Map and the project list you submitted to GABAC last August. All of these Plans treat bicycles facilities in this part of North Valley differently and often contradict. That's a

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real problem that needs to be remedied. I had hoped that the Bike and Trails Plan would do that. Sadly, it actually confuses me when I try to grasp community intent and balance it with opportunity and quality multi-modal infrastructure (both existing and proposed/planned)

If you go up to a 2500' bird's eye view of bicycling facilities in North Valley, I think this project will have immediate and significant negative impact on E-W bicycle travel and connectivity. But I wonder if an even bigger issue is the N-S bicycle impact this project will have on Edith. Right now, the Valley is served N-S by Bosque Trail, Rio Grande and North Diversion trail (gap between over 3 miles). Most cyclists (probably 95%) consider riding 4th or 2nd for any distance at all prohibitively dangerous. That's the key—we will and do ride these streets, but only for very short distances so we can fit into traffic gaps. 4th Street has always been a problem with ROW/4 lane configuration and 2nd has always been a problem because of the very high posted roadway speeds and also average travel often 15mph over that. It's just not a roadway environment vulnerable users are ever going to feel comfortable using (unless speeds are literally cut in half). Edith is a different story and has been a roadway that has been subject of significant discussion for bicycle facilities over last 20 years. And it makes sense. It's lower speed and it would not take much to make a few minor modifications to make it a great N-S bicycle facility. From downtown, I often use it when I have to get North and don't have time to get up to NDC or over to Rio Grande. It's not great now, but I just rode it a few days before the meeting to get to Honeywell from Downtown and it was fine as long as I controlled MV traffic in my lane at intersections and RR Tracks. I think the entrance for the Transfer Facility on Edith would ruin any future opportunity for the intermediate N-S distance connectivity we do need in inner North Valley.

Another significant concern is access to the Montano RR station. Right now it's just a big parking lot. That's a lost community opportunity because it could and needs to be much, much more.

At meeting I happened to mention N-S concern to Councilor Benton and he said that we were okay due to Alameda Drain Project. After thinking about it and talking more to Bernalillo County, I'm not so sure I agree. Yet. I think Alameda Drain Trail will be great for local bicycle and pedestrian connectivity (I see folks struggling in the area all the time) but I think the distance connectivity opportunities would be limited from Montano to the South due to expense of providing safe and efficient bike/ped/Equestrian crossings (and yeah, there are people that would want Equestrian access from far NV) at Montano, Candelabra and Manual. Nolan thinks that he could get safe crossings at signals/crosswalks but the reality is we see very few communities doing that any more as the balance of risk and ROI just don't pencil. Also, whether we are

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ready or not, that ebike thing is going to hit within the next few years and that's probably going to be game changer in places like the North and South Valleys (don't ask me how but I heard a lot of smart people in other communities like ours worrying about ebike impacts this summer)

My last concern that I am just going to throw out there is I still get the sense that you, the Administration, high-level management and the Council see cyclists as a class that can be boxed and grouped. I think the reality is much, much different as there are a few hundred flavors and almost as many needs. I also think this distinction is very important as we plan our multi-modal network (and yes, I think constantly revising old decisions instead of a very hard reset and fresh analysis is a disaster for us as we know have plans with concepts and decisions that are rapidly going extinct, yet require significant investment). For me, daily, I probably am six or seven types of cyclists with many diverse needs: connectivity; safety; transit; shopping, medical; commerce; health (exercise); professional/commuter; social; recreational/mountain biker; thirst quencher and dog exerciser. Just as my needs and expectations are diverse and change throughout the day, the facilities need to and can be as well. Want to take a run up to MSP, Seattle or Spokane? I can show you and that's an important point. A lot of communities are already doing it and it is working very, very well.

I've had a hard time sitting down to write this as I know it's opening another can of worms for cycling community/CABQ relationship and I am pretty worn down by that. I was especially disappointed to see that there was no mention of this project and roadway impacts/needs in this area in any part of BTFP and most important, to me, the list you provided and discussed with GABAC this summer. It just doesn't feel right and seems yet another example of a fairly large disconnect within CABQ/BernCo/NMDOT concerning people traveling on bicycles. As a community we want to talk the talk, but boy, it sure seems like when it comes to put rubber to the road, agencies and politicos are often pretty much tone deaf as to what the user communities think our needs are—quite often what should be very important community relationships feel gratuitous or simply dismissive.

Anyway, now I've put it out there. Do with it what you will. I do want to be a part of any Advisory Committee that serves this effort going forward as I think my knowledge of bicycling in NV and previous discussions and plans is important and bicycle/pedestrian interests deserve representation and consideration.

Thanks for your time and consideration.
—Scott Hale

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I believe that this would be a terrible thing to do to this area due to the noise from traffic, the added traffic congestion, more litter on the streets from loss of trash from vehicles going to and from the site and the smell from all the garbage. The existing operation there is already problematic from the previous issues I have cited. Please do not expand this use. Thank you.
—Douglas Coots

I have lived in the Stronghurst neighborhood for 33 years. What was a very quiet neighborhood in 1982 has gotten noisier and noisier. (Too bad sound barriers were not put up during the I 25 freeway project.) So because the proposed transfer station would undoubtedly contribute more noise to this beautiful area, I am 100% against it. Please choose another site away from residential neighborhoods. Yes, I understand that the proposed site at Edith and Griegos would save the city a lot of money, MONEY should not always be the deciding factor. Any city, THIS city, is about people.
—PK Kozel

I am extremely concerned about the impact this transfer station will have on the North Valley community. The traffic increase alone will make travel to I-25 almost impossible for valley residents. It will be easy for the garbage transport vehicles to enter the interstate, but having to dodge a thousand extra vehicles a day, will be an insurmountable obstacle for residents. The literature and dialog indicate that air and noise pollution will be cut, but I see this as ludicrous with the increase in garbage and traffic. Property values are surely going to be affected by this facility and not in a good way which is a tremendous concern to all property owners in this area. I question the city's motives in placing a facility such as this, in an area that is located within a residential community. Certainly the city owns property in a more isolated area that would facilitate this operation without affecting such a large population and without causing such traffic congestion.
—Jane Foster

As I noted in a drawing on your poster board at the January 20th public meeting, the "3% increase" in traffic in the area due to several hundred garbage truck and trailer trips to and from the transfer station will have a serious impact on an already congested and poorly-designed freeway off-ramp and frontage road on the east side of Interstate 25. Traffic going north from Candelaria on University Blvd. already has to contend with a merge and lane loss from the east frontage road, and soon thereafter another lane loss and merge with vehicles using the Griegos/Comanche I-25 exit. This is followed by vehicles crossing several lanes in a short distance to get into lanes that will allow them to turn either east or west on Comanche. When you add several hundred garbage trucks daily proceeding off I-25 northbound to turn left to the transfer

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station, it makes the congestion and lane crossing all the more dangerous. I know that this situation is not part of the scope of the project, but I believe that DMD should make the redesign of University Blvd. from Candelaria to Comanche a major priority, in advance of the construction of the transfer station.
—Joe Sabatini

I am very concerned about the deteriorating impact heavy and loud garbage trucks converging from all over the city, five days a week and perhaps all day long, will have on this low income neighborhood. Although your materials say a mere 3% increase in traffic on the interstate is expected, when a driver is heading north after passing through the big I, there is a very short lead distance for merging or entering the freeway before coming to the Comanche/Griegos on and off ramps, and to be contending with big garbage trucks in that space will create a dangerous driving situation. Also, your figures indicate anywhere from 10 to 15 years before the investment in creating and renovating the facility will be paid off in savings on wear and tear on the trucks. I find that an unconvincing trade off; after 10 to 15 years, more expenditures will be needed to upgrade what will by then be a hard-used facility. Finally, I see no environmental impact studies in the materials you have made available. At this point, without more information, I would have to weigh in as opposed to the facility. Thank you.
—Teresa Storch

A transfer station of this kind does not belong in a city. No One would want this in their neighborhood!! Is there a correlation of a poorer community for this vs Tanoan area? Just wondering.
–Sondra Diepen

I am concerned about traffic and the resulting air quality problems. The intersection at I-25 is very congested as it is now. I think it will require some major adjustment to accommodate at least 4 times more traffic from the trash trucks and transfer 18 wheelers throughout the day. Has that probability included in the cost saving formula. That intersection is mentioned in most traffic updates every weekday. In the past meetings there has been used as a selling point that with fewer landfill trips there will be a decrease in exhaust fumes in citywide air quality. I am concerned that those fumes are being moved just north to Comanche-Edith neighborhood. With the increase in trash trucks through that intersection by three to four times plus the 65 trips of the 18 transfer trucks, it seems that there will marked concentration pollution that cannot be glossed over. It would be especially problematic on temperature inversion days for people with compromised respiratory status. I can certainly see why this station meets many of the city goals, but I haven't seen that probable revision of roadways and all health have been thoroughly examined. I have other concerns about traffic increase along the roads. The routes shown for Monday and Tuesday pick-ups were along Comanche. That road is only two lanes

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from west of San Pedro to Carlisle and goes by a park with bike and walking paths and a middle school in those blocks. I think there needs to be much more consideration with many aspects of the planning. Thank you for taking time to listen to my concerns. There are many problems that will definitely have a negative impact on this neighborhood.
– Susan Garriott

Please link to the video taken of the North Valley Coalition meeting on February 19, 2015. The link contains the full video transcript of the 2/19 meeting in 2 parts. Also, will you commit to posting all past, current, and future contracts regarding this proposed Waste Transfer Station on the public contracts website, with a link to a PDF of each full contract. It would be helpful if all these contracts shared WTS as a keyword in their names so they could be easily found (Cognos is a terrible database).
– J. Zimmerman

Why is the City's budget more important than the health (increased air pollution by way of increased city and convenience center vehicles, insects and rodents, blowing trash, hazardous waste holding) of my community and neighborhood? Why should my health, my property value and my safety be the last in the decision to put this transfer station in my neighborhood? The citizens of Bernalillo county are already paying for this transfer station, so how is it saving money? Why do I have to be burdened with yet another industry in my neighborhood, that will layer upon the already high burdened area that is Edith and Comanche area
—Antoinette Vigil

Similar transfer stations given as examples, Phoenix and Washington, show transfer stations separated from homes by much larger distances. The Phoenix transfer station is very far north of the city and the closest neighborhood is new- meaning that people CHOSE to move there with a transfer station as a next door neighbor. This is not the case in the North Valley. I do not need more odors and pollution settling into the North Valley. There is a cement factory, asphalt business, a recycling business...etc. etc. There used to be a dairy and a historic building with peacocks. Now we get bugs, flies and rodents and I wonder how long the historic houses on Comanche will last with the number of large vehicles passing by up to three times more often, not even counting the number of "off peak" vehicles. Why does the City want to put this smack into the middle of the city? Is it because it is predominately populated by Hispanic citizens?
—Antoinette Vigil

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I am opposed to locating a new transfer station at Griegos and Edith. This has not been an open and transparent process so far – adjacent neighborhoods first heard about this in the Albuquerque Journal. There was no public input for the site selection. The first public meeting was held in January of this year at the urging of the North Valley Coalition. At that meeting and in the subsequent meeting in February, we (concerned neighbors) were told how fortunate we are to have been chosen to have this located in our neighborhood. I don't think many of the people in the nearby neighborhoods would agree with that. I also don't think many of the people who are going to be affected by the traffic increase are even aware of this plan. The City has decided to build the station in the close-in north valley which is somewhat of a rural area, although the immediate vicinity is industrial, to accommodate all the trash produced by the east side (east of Carlisle) and the west side (west of Coors) which greatly outnumbers the amount of trash produced in the north valley. It would make much more sense to put a site on the west side and one on the east side – all the new development is going up on the west side. Why not sell this site and buy some land out there?

Traffic has not been assessed accurately. It would be great to have one meeting on only traffic – traffic flow, calculations, routes, etc. The city is being disingenuous to say there is a slight increase of 3% and therefore traffic is not an issue. Everyone is fully aware that this is going to be the biggest issue. While the city may be able to control garbage truck routes, it will not be able to control convenience center routes. Griegos is a two lane road west of Edith and a two lane road east of Carlisle; it is also a bike lane, albeit not up to code. When I try to take a right hand turn from a business on the east frontage road just south of Griegos and move over several lanes to make a left on Griegos, I can't do it, there is that much steady traffic there now on a slow Saturday afternoon. High density housing is being planned/built on San Clemente east of 4th Street – this creates more additional traffic trying to access the freeway. There are no plans to address problems with traffic and road maintenance.

Air quality is also a big issue. Several times recently I have driven in the area and smelled fumes, I assume from the asphalt plant. There are already many trucks from the nearby businesses and fumes from the cement plant. Any additional pollution should be considered as compounding what is already a problem. This is not an issue to be swept under a rug – it is a very valid concern and needs to be fully addressed. I would hope that applying for an air quality permit would address these concerns and yet the city is avoiding doing that. Why? What issues might surface that people should know about?

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These issues should be fully addressed before any forward movement in design occurs – this is owed to the nearby neighborhoods. Hopefully, this will result in a transfer station(s) being relocated to more appropriate locations.
–Peggy Norton

Can you please explain how the public outreach to the Hispanic community was performed? Keep in mind, ***while Hispanics comprise 48 of Bernalillo County's (including the City of Albuquerque) population, 70 of the population in the proposed Transfer Station area of the North Valley are Hispanic.***

In addition could you please explain the justification on why you are bring more polluting industries to an undeserved community that is overburdened with industrial companies?

What is being done to ensure that the voices of minorities will be heard? Especially for minorities that do not have the money to purchase the newspaper, have access to the internet and particularly community members who only speak and read in Spanish.

What I want you to do is to go back to the community and properly complete the outreach to those that are Hispanic; because you the City of Albuquerque and the design team that were hired did a poor job the first time around.

To ensure that minorities and Spanish speaking community members are given an equal opportunity to have their voices heard and participate in the decisions of the types of industries that will affect their health, safety, environment and general welfare. You need to send a notice in the mail to all the residents in Spanish and English. Provide Spanish Translators and material in Spanish.

Do you feel the minorities and Hispanic community members have no rights to live in a safe and clean environment? The neighborhood needs to be protected from harmful exposures imposed on them against their will by corporate polluters and government agencies that are callous of the impacts affecting the health of the people living in the neighborhood.
–Esther Abeyta

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Thank you for allowing comments on this project. While I understand the purposes for a project of this kind (save fuel, save wear and tear on the trash trucks), I am apposed to this location for the project. I am concerned about the amount of traffic in the area especially the I25 interchange. This is a difficult and overused interchange already. I think this number of additional trucks will make getting into the North Valley much more difficult. Number 2, I am concerned about the amount of air pollution these trucks will emit into this area. The California Air Quality Board proved that the particulate matter emitted from trucks in and out of The Ports area of Los Angeles directly contributed to lost school and job time as well as increased hospitalizations of children with respiratory illnesses. The solution there was to mandate all heavy trucks change fuel sources to something cleaner. At the North Valley meeting I was told that no such plan is in the works for these trucks. Thirdly, I am concerned that this area of the city is not valued. UNM found that the Near North Valley is populated by predominantly older adults. The proposed city homeless centers will decrease property values and potentially safety. This project will not increase the quality of life in these older neighborhoods.
Thank you for your consideration in this matter.
–Lorraine Olson

We live somewhat removed from the immediate area near Griegos and Guadalupe Trail. I am not in favor of this station at your proposed location.

My first concern is road safety:

1. I feel like the Griegos exit from the freeway and roads leading to and from the proposed station are narrow, curvy and unsafe for lots of trucks to be going in and out of.

2. I have watched trucks exit northbound I-25 and making the left onto Griegos is tricky, and I think unsafe.

3. Turning into the station from Griegos is dangerous because the road curves near there, making visibility a problem.

4. There is a railroad track with more curves nearby.

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5. While I think that Edith and 2nd Street are decent roads for trucks to travel, many roads such as Griegos from I-25 to Rio Grande are not.

6. I think that more trucks in this area will not be a safe thing.

My second concern is neighborhood air quality.

1. There are several homes near the proposed facility. It seems unfair to these homeowners to have increased vehicle exhaust etc.

2.We have frequented the Eagle Rock facility innumerable times. The location is removed from residential areas and therefore seems more reasonable.
–Jen Parker

I own a home approximately one mile west of the proposed transfer station. I am a retired senior citizen. Because I do not own a car, I walk to the local shops and also use public transportation ***on a daily basis***. I am very concerned about deteriorating air quality from the increased air pollution from 140 garbage trucks traveling through the neighborhood as well as the pollution the 18 wheelers will generate. In addition to increased pollution, I am very concerned for my personal safety as I have already had several close calls while trying to cross 4th and 2nd streets even at non rush hour times (always in the crosswalk with the walk sign) because of impatient drivers in already heavy traffic. There are two elementary schools about a mile from this proposed facility and many parents walk their kids to and from school. The increase in traffic would be not more cars, but huge garbage trucks. I can't even visualize trying to outrun a garbage truck if the driver doesn't see me. Imagine this situation with a small child going home from an after school activity when there's no crossing guard!!

Another concern is my property values decreasing. My home is my only insurance against a personal health catastrophe. I don't regard a humongous garbage transfer station a mile from my home to be a positive selling point. If it was, more neighborhoods would be *begging* that you build this facility in theirs. I have already seen large rats running in and out of pipes in the drainage ditch on 2nd street and I can only imagine that vermin would increase. Although the city states that

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this will be an enclosed facility, garbage still spills and blows around. Garbage pickup on my street almost always leave bits of trash in its wake.

I was especially taken aback by the city's admission that they have not done a very good job maintaining the current waste facility on Edith and Griegos. I don't care how old and outdated that facility is, it is still not an excuse for it to be constantly littered with trash and broken glass. This situation only got better in the past month after it became an embarrassing issue. If there was no interest in keeping the existing property clean, why would I feel confident that the city is going to keep the new facility grounds clean as well as the surrounding properties?

To recap, my concerns include: pedestrian safety, increased air pollution, environmental pollution, litter, and the potential health hazards generated by 140 garbage trucks traveling through my neighborhood in order to dump tons and tons and tons of filthy garbage one mile from my house.

And, to add insult to injury, I get to help to help pay for it!

Thank you and I look forward to your response.
–Theresa Hanretta

I would hope that If the Waste Transfer Station is built, that the City of Albuquerque take into consideration modification of the traffic routes and serious study of the real impacts of the traffic on the adjacent areas, including and far beyond the immediate neighborhood of the project. **ALSO.... I suggest the creation on the site of a small park and small building to accommodate a PUBLIC ART element that would include only and specifically RECYCLED MATERIALS IN ART/SCULPTURE. These would be changing works sponsored by a local or state funding source. We could also include classes for the community that include art work from recycled materials. I believe that the City Public Art Program would be amenable to maintaining the project. This would be a significant PUBLIC ART project for this part of the City, with visibility from the Interstate as well. A park of this nature would also be a useful good will gesture to the neighborhood. Other cities around the country have provided this at recycle facilities.**
–Carolyn Robbins

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As a longtime Valley resident and 4th Street, NW business owner I favor the transfer station because of the projected efficiency improvement over the existing system. My concerns are twofold:

1-The facility must be state of the art and address citizen's concerns....

2-Once the facility is completed, meetings are held to address unanticipated issues...
–Dan Kutvirt

The City says the building will be contained. I went up to Eagle Rock and observed the process. The building is not contained at all. The doors were all opened. The odors and pollution was all going out into the community thru the open doors. The City neglected to mention that the trucks have to go in and out all day along with the noise – odors – dust!
–Perry Key

Was agreement with the city and property owners looked at from the 90's?
–Guy Conway

Who's going to clean up the wind driven trash that will cover the neighborhood – we haven't solved this problem at the 2 recycling plans further north on Edith. Is there any plan to check incoming haulers for contaminants & radioactive debris? What are the expected hours of operation?
–Ken Andrews

1. By what route are the garbage trucks & 18 wheelers taking to transfer 1,443 tons of garbage a day? And what route to I-25?

2. How about safety of kids, parents, etc., who make up several school populations in areas affected by trucks, ex., woman on bike who months ago who was hit by garbage truck who lost a leg and would have died if not saved by passerby. Children are hard to see & don't always make wise choices.

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What the City refers to as Edith transfer station is in fact a daily garbage dump – garbage by any other name is still garbage. I think what the City refers to this garbage dump as convenient for the adjacent neighborhoods to use is a travesty. Are individuals' trucks, vehicles containing dump material even able to drive up & use this site?
–Joan Verplank

Not only was there no public participation in the site location selection, but there appears to be no thought to whether the City should have one single transfer station or multiple smaller transfer stations located throughout the city. We should take a step back and consider a multiple location/smaller station option. Riordan says traffic will increase 3%. Soladay told me that today garbage trucks leave in the morning and return at the end of the day, that under this transfer station plan, trucks will leave in AM, return mid-day, go out again, and return end of the day. This means each truck goes from 2 entries per day to 4 per day – that is doubling that traffic PLUS the large loaded semi-trucks leaving many times per day for the landfill.
–Anonymous

Put it some place (undesignated mesa area). North Valley has already absorbed big recycle center, asphalt hot batch plant. What else do we get blessed with?
–Patrick Garrison

Why is the NMDOT STIP (State Transportation Improvement Project) list upgrading the Comanche/I25 Entrances and Exits as not to be addressed until 2025? This (ETS) plan is obviously (and documented by the 2014 Feasibility Study) adding tremendous numbers of entrances, exits, and sharp turns by high-profile vehicles onto an already short angle and busy freeway approach. NMDOT plans, designs, and funding must be addressed as part of this proposal and part of the EPC report before any going forward.
–Colwyn Gullick

I have personally nearly been run down by a garbage truck at that site already while riding my bicycle to work up Griegos at 0630 am. I wound up on the ground, with the driver driving away without even seeing me! I have had numerous close calls in that area with trucks turning. Adding semis into the mix will only make a bad traffic situation worse. The smell is

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also bad now. That can only get worse as well.
–Vincent Amendolaginer

1. What are the negative impacts at our other exits and entrances of Eagle Rock Facility?

2. Eagle Rock gets very busy and vehicles are stacked 15-20 deep on Eagle Rock St. What is the stacking capacity for this site?

3. Do you have elevations of any of your proposed site plans?
–Anonymous

I pass through the intersection of Edith and Comanche no less than 8 times a day. The traffic heading west on Comanche always bottle necks at Edith because it goes down to one lane over the railroad tracks and then widens again. I cannot support a project that is going to add a lot more traffic to this area until the road narrowing is addressed. I have owned property in the area since 1998 and am very concerned about reduced property values also.
–Colleen Grathwol

Prefer [Rankin] Road Access
–Anonymous

1. [Rankin] Road plan is costly. The right of way is not adequate and site distance of the hill crest if inadequate.

2. What guarantee is there that other existing convenience centers will remain open?

3. Please address resolution 270-1980 as to how this will benefit the neighborhood and community.

4. Site Plan A or Site Plan B are preferred by me.
–Franklin E. Wilson

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I am concerned that all questions, concerns and fears are being smoothed over by the architects with glib and unrealistic statements about how beneficial this will be for us here in the valley. If this project comes to fruition, where will they be 10 or more years down the road when their unrealistic projections about garbage, traffic, noise pollution, air quality etc. are proven wrong? They will have completed their project and we will be stuck with the mess of their slick campaign.
–Jane Foster

As I read about the Transfer Station, I have concerns about the amount and type of traffic increases that will occur not only on Comanche and Edith, but on I-25 entrances and exits for Comanche and the frontage roads on either side. There is a significant amount of traffic existing on these roads already, as this is a dense neighborhood of commuters. Will there be a safety study done? I also have safety concerns for the amount and size of trucks in and out of the station traveling on this road, impeding the existing traffic. Thank you.
–Josi Ortiz

I would like to see this happen I think it is GREAT!!!
–Rita Raley

I am against having a transfer station at Edith and Griegos, ABQ, NM. It will cause pollution in the north valley from all the dump trucks going to this location and it is near schools and the area has too much traffic already. You need to put the transfer station outside of the main part of ABQ. Why do you want to put it in the northwest valley of ABQ? It will not enhance our neighborhood at all and it will lower our property values. We have traffic problems already with Montano and 4th NW and 2 nd St NW. We do not need more traffic problems which this transfer station will cause us. Please move it somewhere else and put it on the outskirts of Albuquerque.
–Ann Marie Sekula

Are all the trucks which are currently picking up garbage near the land fill going to drive all the way to Edith and Comanche to dump the garbage so it will be re-carried to the landfill? That doesn't make sense. Nor do all the trucks coming east over bridges from the west side, so garbage can be re-carried to the west side. Based on the experience of other transfer stations, what are the health effects and traffic consequences of putting a garbage transfer station servicing the entire city, in the middle of the city? What happens if something goes wrong? There is no alternate transfer station.

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When can I expect your answer? Thank you.
–Loren Kahn

I understand the City is 'committed 'to the Edith site. Though it may not be the 'best'site, I acknowledge the City's direction in further developing the waste transfer station on the Edith site. In that regard, the City and their design team have a responsibility to address the community's concerns and to mitigate and minimize any and all deleterious effects of the new development on the surrounding neighborhoods. Such requirements can be more fully explored in the future Environmental Planning Commission review of the project, as well as the NM environment department review for licensing/regulatory compliance.

1.Based on neighborhood concerns, and environmental issues of health, life and safety it appears the Rankin Road option is most preferred while it meets the programmatic needs of the project.
2. All of the design options including the current Rankin road option have a commonality of keeping the fueling station in its current location. I believe starting the design process with the premise that the fueling station needs to remain is a bad idea. By having the option to relocate the fueling station elsewhere on the site creates a multitude of more desirable design features that can be incorporated into the site plan. The cost to relocate the fueling station appears to be negligible as compared to the size of the $30 million project. Furthermore, the design options gained by relocating the fueling station will exponentially increase the favorable acceptance of the project. In reviewing the Rankin Road option, by relocating the fueling station, the transfer building can be located further south, closer to Rankin Rd., and the vehicle maintenance facility could be located north of the transfer building thus creating a buffer between the publicly accessible drop off area and the large refuse vehicles. I believe it is imperative that there be a clear separation of circulation paths between all of the refuse trucks and the public/vehicles.
3. It was stated that this project is to be an example of "environmental stewardship". If that is true, the project should be a LEED Silver or higher level rated project. In addition, in addressing many neighborhood concerns of air quality and air pollution, this project should have enhanced commissioning and enhanced environmental monitoring built into it on a yearly basis after the project is completed to show the neighborhoods that the city is serious about its "environmental stewardship".
–Lee Gamelsky

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There is talk of extending Rankin to the I-25 Access Road to provide a way for the trucks to access the Edith transfer station without using Comanche. Will this route still use Edith to enter the transfer station? Have you analyzed the impact to traffic exiting I-25 at Comanche? It is my experience that the north bound exit gets backed up as it is. How do you know that there will not be bad odors exiting the facility? What happens if after it is built order is a problem?
–Eleanor Walther

This use is so exceptional that the arbitrary restriction on traffic volumes needed to justify a signal should be suspended. Also, the Comanche curve down the slope of the hill creates additional traffic hazards.
–Joe Sabatini

My comments were sent via email to Patti Watson. I oppose Site Plan D – Rankin Road transfer truck access. I support Site Plan C – utilize existing Comanche/Edith. Tonight's meeting was well conducted.
–Anonymous

As a member of the cycling community, I make regular use of the bike lanes on Griegos & Comanche boulevards. Even though it is the least dangerous east-west corridor for ABQ cyclists, there are still four "ghost bikes" commemorating cyclists who died in collisions with motor vehicles over the past 10 years. Aside from all the other reasons I wouldn't want a transfer station in my back yard, the resultant increase in heavy truck traffic would be contrary to ABQ's intentions of becoming more bike commuter friendly. For cyclists, Comanche/Griegos is a valuable connector to bike paths that follow the diversion channels and the Rio Grande. If there is no other option to the WTS than the Edith location, then the city owes it to the cycling community to build a dedicated East-West bike lane that physically separates bikes from vehicular traffic.
–Tom Teegarden

We prefer Plan D, Rankin Rd.. It alleviates traffic on Comanche west of Rankin and also on Edith Blvd. providing a more direct route to I-25. We understand the reservations of the business owners on Rankin but feel that the Plan D will not be devastating, as they perceive, and that they can adjust. Furthermore, they will benefit from an improved and better

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maintained roadway on Rankin.
–Stuart and Julie McIntosh

I am opposed to the 22 acre trash station intended for the Griegos/Comanche dump center. I believe it will harm the already impoverished neighborhood and create another major problem for traffic flow in the area to the I-25 entry point.
–Cliff Sarrel

I already sent an email but I was in a hurry to get on I-40. In order to get on I-40 I must travel up a 1 lane rd. (Griego) to get to I-25. Also, there is a bike lane going up Griego to the freeway. These bicyclists already face dangerous conditions. I also bike and will be in more danger with the slowdown that will occur on that 2 way rd. It will become worse than Montaño at rush hour, and you know how horrible that is. I see multiple problems with this plan and its disregard for the effects on the surrounding area and traffic flow. People already have difficulty merging onto I-40 from the Griegos entrance and also switching to I-25 right there. There will be an increase in highway accidents with all those slow moving trucks entering the freeway there at Griegos! If you have ever tried crisscrossing from the I-40 lanes to the I-25 lanes, now add the 364 trash trucks plus the environmental implications. There must be a better location. UNLESS THIS IS ALL ABOUT CONTRACTS AND MONEY AND NOT THE PUBLIC'S CONCERNS. VERY POOR PLANNING.
–Phil Chynoweth

Just Sayin'. What ever happened to the quiet, green North Valley? Oh, that's right–we now have Albuquerque's Solid Waste Department on 22 acres of land at Edith and Griegos. We have adjusted (somewhat) to the dust and noise from all of the garbage trucks in the City of Albuquerque parking at the end of the day and then leaving in the morning from that site. Now we are informed that the city proposes to build a large indoor transfer station at this site. It would hold tons of trash dumped in the trailer of a big rig where it would wait to be hauled to existing landfills. Dust, noise and odors would not be problems because all activity would take place inside. A "possible lengthening of nearby Rankin Road to the I-25 Frontage Rd." The entire project would save taxpayers over a predicted $4 million a year. It's hard to argue with these figures! Soon the quiet, green North Valley will be a fading memory.
–Agnes H. Baxter

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Air quality, smell, safety and traffic are all concerns to me. I have contacted you before to tell you I am a bike commuter who had more than one near miss in front of the facility and Griegos leading to the freeway. As to the smell, just go by there. The truck exhaust is concerning as well. I understand the ecological reasoning, but not at the cost of my life and limb. What are alternatives to this? I have not been to the meetings so I do not know what mitigation to traffic have been proposed. I know the NVC is asking for the entry to be NOT on Griegos. Will there be a light/with NO RIGHT TURN ON RED on to Griegos?
–Vincent Amendolagine

I manage a rental property near the site of the proposed transfer station (address is 4444 3rd St. NW). I'm really concerned that the city has decided to put yet another industrial installation in an area of the city that has been primarily residential or agricultural for one hundred and fifty years. The proposed Edith transfer station will bring even more heavy truck traffic to a corner that already accommodates cement trucks and asphalt trucks. It will also bring even more odiferous cargo to the neighborhood that already receives plumes of tar cooking from Holly Asphalt and dust from the cement plant whenever their filter system fails. Those industrial uses appeared here after the two nearest neighborhoods (the Gardner Addition! and the neighborhood bordering the Griegos Adobe which is literally a block and a half from Edith and Griegos) were built. The full court adobe on the corner of Edith and Griegos, now the Albuquerque Museum Foundation headquarters, dates back to the 1870s! It is thoughtless and self-serving of the city to put a clearly industrial and obtrusive garbage transfer station in the midst of residences and across the street from the last full court adobe remaining in the city, a beautifully restored historical landmark. Garbage transfer stations do not belong in residential neighborhoods, no matter how much money the city will save in gasoline, the ostensible reason for developing the Edith site. To save that gas money, you are imposing an unequal burden on a neighborhood that is historic, but lower middle class and therefore lacking the funds to fight back as effectively as, say, the folks one mile away on the edge of Los Ranchos.
–Sharon Karpinski

I oppose the location of a waste transfer station at this site. I support development of an alternative location not within the city.
–Susan Selbin

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I am opposed to the proposed Edith Transfer Station. I have lived in the north valley since 1991 and have seen incredible growth in population and traffic. This proposed transfer station will decrease the quality of life for the north valley and significantly increase the traffic, bringing with dangerous traffic situations, noise and pollution that is detrimental to the health and wellbeing of all living, working and being in the north valley. Traffic on Griegos/Comanche is already difficult especially near the freeway entrance, exit and Edith. I have watched the trash trucks take at least two lanes to turn left onto Edith with an increase in over 300 trash trucks at least twice a day and the larger transfer trucks traffic problems with be increased to the point of causing dangerous situations. Getting off the freeway will be impeded five days a week all day long. This will cause problems for everyone using the freeway around Comanche. This increase in traffic will bring with it an increase in noise that cannot be mitigated by parking lots. I live more than two miles from the freeway and hear it day and night. The exhaust from the over 620 truck trip each day of the workweek will further negatively impact the health of the more than 18,000 people living in the area, all those working in the area and those passing through the area. The exhaust will impose a health hazard to all those exposed to it and the natural surroundings.
–Denise Wheeler

I live in a nearby neighborhood. I am concerned primarily about the health impact of substantially increased diesel traffic in an area close to schools and neighborhoods that are already overburdened. Driving on Griegos daily, I think the traffic assessment that was done fails to capture the real impact of the proposed project — the Griegos and Edith intersection area (extending to I-25) is already the most hectic part of my commute. The fast drivers and steep curves will not accommodate this traffic well. Secondarily, it seems that the Rankin Road proposal was never expected to be viable and I am disappointed that it was proposed as an "alternative".
–Heather Brislan

The City Waste Transfer Station, contrary to Albuquerque Journal opinion, demonstrates little care for the environment or the neighborhoods and families that live in the area. The Albuquerque Journal editorial, "Transfer station debate isn't simply trash talk" is an unqualified endorsement of the project that accepts the City perspective without question or independent research. For example, the Journal states, "The City has listened to the public and made adjustment to the plan". In reality, the City made the decision to create a new all waste transfer station and decided where to put it long before the neighborhood ever heard about the project. The public input is all about the "design of the building," the least consequential aspect of the project. This is, at best, shoddy governmental manipulation in order to gain credibility for on a deal already decided. Does the Solid Waste Department plan really help the environment as they claim? Yes, they cut

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miles driven by using bigger trucks and getting garbage to the landfill more efficiently. However, a City concerned about the environmental impacts of its solid waste stream would be putting more effort into diverting recyclable and compostable material away from the landfill and into productive uses. It wasn't that long ago (2009) that Albuquerque announced a Zero Waste goal. More recently the Solid Waste Department website makes no mention of Zero Waste. Less waste means less garbage into the landfill and less danger of contamination of the aquifer. It also means less justification for the transfer station as there is less waste to bury. The Journal says "Money Matters" and that is the big reason for building a transfer station. However, we can't lightly ignore the costs to the health, safety and property of the people who live and work nearby. Health professionals were contracted to conduct a Health Impact Analysis that demonstrates disparate impacts on the 18,000 closest neighbors in terms of air pollution, traffic, noise and loss of property values. Reading the HIA report, developed over a period of eight months with active participation of the affected community, I was left asking a big question. Does the City's waste transfer station really save money or does it just shift the burden of costs to its closest neighbors? To sum up: the City has not listened to the community. A waste transfer station at that location was decided without public knowledge. The project does not respect the environment as a zero waste agenda would do much more to reuse and recycle the waste and reduce the amount being buried at the landfill. And, it is questionable whether it saves money given the uncompensated cost burden for the neighbors and the forgotten alternative of reducing waste rather than hauling it to the landfill. The transfer station is a questionable project that should not be built. Solid Waste could best use our tax dollars to help us all to produce less garbage and divert more waste to beneficial uses.
–Ken Balizer

Despite GABAC members attending the various public meetings and the presentation given to GABAC last winter, it still seems pretty much impossible to select a preferred alternative and sort out the impacts on bicycling and multi-modal travel along two important bicycle corridors. Further exacerbating the problem is that current facility conditions are considered deficient by the local bicycle community and do not meet most national guidelines or even our own DPM. It seems like it would be logical to expect an analysis of impact on current bicycle facilities for all scenarios if CABQ has no plans for modification. Conversely, it seems appropriate that if there are upgrade (or moving facility designation to other corridors...) opportunities, now is the time they should be discussed with and processed by impacted communities. If I recall correctly, GABAC was told that the traffic impact study would be updated with bicycle network impacts but the process as I understood it does not make sense in current scenario scheduled for EPC. At what point will further vulnerable roadways user impacts be presented and discussed with impacted (bicycle/pedestrian/Transit dependent) communities? And what will be the process/schedule? Just so we are all on same page, the schedule reference below is

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from communication sent to North Valley residents by the North Valley Coalition earlier this evening (taken from ETS project website): "The City said it plans to select a site plan by August 3 and submit the plan to the Environmental Planning Commission by August 27 for a zone change request. The hearing is currently scheduled October 8. The New Mexico Environmental Department is expected to begin the permitting process in February 2016." GABAC and bicycle community in general do not know enough about planning and zoning processes or institutional machinations to know if we are being excluded until after important decisions are made or not. I would appreciate some guidance and insight into how and where our concerns can best be presented and processed by both design team and important decision makers. Thanks for your time and consideration.
–Scott Hale

Please consider these my comments with respect to the City's July 15, 2015 public meeting about the two site plans remaining under consideration for the proposed waste transfer station at Edith and Griegos/Comanche. Neither "Site Plan C" nor "Site Plan D" is acceptable. Neither plan routes traffic in a manner that best moves trucks and other vehicles quickly and safely from the interstate into the site. Both plans use ingress and egress points that lengthen rather than shorten the distance that trucks must travel. Site Plan C, by using the existing Edith entrance/exit, requires the large transfer trucks to travel the longest distance possible between the interstate and the site. Site Plan D, by using Rankin Road, also lengthens the travel distance as well as causing substantial disruption to the adjacent businesses. Both site plans, by using the existing entrance/exit on Comanche, bring traffic conflicts too close to the Comanche/Edith intersection, and do nothing to minimize or reduce conflicts with existing truck traffic from the businesses on the north side of Comanche. As a consequence, these site plans do not make economic sense. Neither site plan appears to use landscaping and building location to mitigate noise, trash, visual clutter, and other predictable impacts. Neither site plan demonstrates "planning outside of the box." I urge the City's design team to reconsider its approach. Thank you for your consideration. Marit Tully, Member, North Valley Coalition Board Member. Near North Valley and Executive Committee
–Marit Tully

I am a person who has been active in learning about the plans for the Edith Transfer Station and in understanding its effects on communities nearby by participating on the Health Impact Assessment Committee. I am a member of the North Valley Coalition Executive Committee, recently elected President. I have attended every city meeting and helped host a North Valley Coalition Meeting. The comments I express in this letter are my own personal views. After hearing the site plans discussed at the July 15, 2016 public meeting, I cannot at this time endorse either site plan; neither one alleviates

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the issues and concerns of residents and businesses. Too many questions were either unanswered or answered ambiguously, and problems which have been previously mentioned were not alleviated. Negative effects to businesses on Rankin Road, which were newly introduced in this public meeting, have not been considered. Did the city communicate with these businesses concerning the plans? It wasn't apparent at the meeting that they had. Many of the previously mentioned problems concerning traffic at already congested intersections have not been addressed. Intersections near the proposed site already have a D rating. High density housing near Fourth Street and Griegos and unleased buildings and undeveloped land north of Comanche are going to create more traffic than the 1% increase being considered. Dense and unsafe traffic flow between the big I and the Comanche exit/entrance north and south is not being addressed and the city does not consider that their problem. Left turns and queuing created by left turns are a problem with either plan and no traffic signals or road adaptations are being considered. How many vehicles can queue on the site? No answer was given, but they are still idling vehicles providing air pollution. Vehicle numbers have been vague which makes it difficult to assess the impact on roads, and specifically Rankin Road. 312 vehicles on Rankin Road was presented but without a complete explanation. Information was provided that there are only two routes planned per truck per day (which is the current number) and no drivers will be laid off (confirmed by discussions with the union). The majority of the money saved in the feasibility study is from labor; how and when is that savings going to be accomplished? Bicyclists mentioned problems with the design for cyclists and it would seem that nobody involved in the project has talked with cyclists. So, the city has not communicated with bicyclists or local businesses, and are only communicating with nearby neighborhoods because someone read about this in the newspaper. At this point, no baseline noise data has been collected. Without that, how can you consider the effect of noise on businesses on Rankin? No air quality permit will be requested. Timing of traffic studies has been called into question. Concerns were expressed about water contamination and it was stated that a Storm Water Pollution Prevention Plan (SWPPP) is in place now to prevent this problem. Generally, a SWPPP plan is for construction only so is there really a SWPPP plan in place? This is the same administration that attempted to circumvent EPA regulations regarding SWPPP's when building the Bosque trail north of Central. As one person suggested, it would have been helpful to have a representative from the Environmental Protection Agency at the meeting to address concerns of water contamination if that is the organization that would address the issue and permit the plan. The question asked about the number of transfer stations in the state and the experience of NMED with permitting this type of facility was not correctly asked and the person answering (who was never introduced) took advantage of that. The question should have included transfer stations "similar to this", which will be handling 28% of the state of New Mexico's garbage and will include garbage, garbage trucks, 18-wheelers, private vehicles, recyclables, household hazardous waste, fueling station, maintenance facility, administration. Instead, the answer included all convenience centers in New Mexico. Is there any

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facility in New Mexico that provides all these planned functions? I'm sure the city knows that answer and could have been more informative and truthful. Many people spent many hours attending meetings and learning about this project — all unpaid hours. I think the city should be more respectful of that. The convenience center will operate 7 days a week. The additional traffic, air pollution from idling vehicles, and litter for this center is being downplayed and is the same for both site plans. There has been no guarantee offered to ensure that Eagle Rock will not be closed, a scenario included in the feasibility study calculations. If this occurs, there will only be more negative effects than are currently being considered. I came away from this meeting with many more questions than answers. Each site plan created problems and maybe the real problem is the site.
–Peggy Norton

Please accept my comments to be included in the record for the Edith Transfer Station. The transfer station is not in the best interests of residents living in the Greater Gardner Neighborhood. This transfer station will be an extreme burden bringing increased traffic and pollution. The increased traffic poses a danger to the general public with too many trucks in one location. The solution is to limit the amount of truck traffic to 75 loads per day. We strongly feel increasing the amount of traffic will result in unsafe road conditions. The Transfer Station will also result in similar companies locating in the area. We implore you not to build the waste transfer station in the Greater Gardner neighborhood and locate the facility in an area with less industry.
–Steven & Esther Abeyta

To my knowledge the proposed site will be a refuse transfer station open to the public and for city use. I feel that this site will create a large amount of unforeseen issues in the area. I already have a couple concerns which are listed below:
1. A much higher amount of traffic
2. Cleanliness of the area
3. Debris all over the streets
4. Odor
5. Vermin

This is just to name a few!
I am already on the fence whether I should keep our warehouses in this area due to overall look, traffic, cleanliness, etc... I am very much now considering searching elsewhere for my warehousing needs. Our customers and their opinion are very important to us! I want in every aspect to have my customers feel that they made a great purchase with our

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company. To me, the above concerns will alter our customers opinions and overall experience. It is my opinion that this proposed site would just bring down the value, overall look, and integrity of the area. Not to mention hurt the local surrounding economy. I for one, will definitely be searching elsewhere if this site is built. I feel sorry for the surrounding area businesses that this will affect as well. This area is already FULL of vacant warehouses that have been on the market for quite some time. I find it hard to imagine that new prospects will be excited and motivated to purchase/lease if there is a "dump" nearby. I feel the domino effect of businesses moving out will continue. Although I feel the city has made great strides in the last couple years to improve all processes, I still think that the upkeep of a "dump" site will not be kept up, clean, and/or organized as it should. I can just see my parking lot a pit stop for all of the refuse users to put on their required tarp on, not the mention the trash that will be left behind due to negligence. I would feel a little better if this site was for city use only, but still feel that the surrounding area will not be kept as it should. I personally think you are shooting yourself in the foot by creating this site. I think this site will do nothing more but hurt our local economy!
Question: Do I get reimbursed for every tire that has a nail in it?
–Jake Schlessinger

Both C and D designs will not work at this proposed site. C affects the local traffic, including the bicycling community, which is already overburdened with huge trucks coming from the commercial zones all over that place. Are you aware that there were 4 bike deaths along Comanche, the only east/west commute for the biking community? Design D is even worse. Rankin Road cannot possibly take any traffic; it is a tiny street not built for trucks and those poor people that live on the corner of Edith and Rankin will never survive traffic! Please find another place for this "proposed" transfer!
–Nancy Bourne

Maloy mobile storage is a business across the street from the city solid waste facility. we already have a bad traffic problem on Comanche due to the amount of traffic going in and out of the city yard. the curved road on Comanche does not allow the normal amount of traffic for a road this size, their are constant accidents on this stretch of road , which damages our property, the city property , our Neighbor's property and the lives of the people getting in these accidents . we have had constant problems with trash all over our yard due to the trash blowing from the city yard and from the trucks

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that pass by our facility's. we see trash blowing all around the entire neighborhood every time the wind blows. We also have constant odor proble! ms due to the smell of the garbage trucks and all the dumpsters, opening a transfer station would only greatly increase the problems in this area which will be a detriment to the neighborhood , employee's, and the businesses in this area. I think the city needs to look at alternative sites that will not impact our community in such a negative way. this site is also way to small, as it exists right now it is extremely congested , utilizing very bit of space available with no room for expansion, that makes no sense. This is the way the city of Albuquerque has always operated why not look to the future 10 to 15 years instead of 10 years behind
–Pat Maloy

abq edith transfer station who does space btw edith and alameda belong to and what is proposed utilization or is it to be landscapes other side space btw parking and street same question also plenty industrial property for recycling facility and collection area and trucks maintenance recycled materials used in any number of commercial products also hazardous waste handling facility needed should be separate locations
–M.W.

Quevedo, Vicente M.

From: Jen Parker <jen.bookworm@gmail.com>
Sent: Wednesday, September 30, 2015 1:14 PM
To: Quevedo, Vicente M.
Subject: N. Valley Waste Transfer

Peter Nicholls, Chairman
Environmental Planning Commission
c/o City of Albuquerque Planning Department
600 2nd Street NW, 3rd Floor
Albuquerque, NM 87102

Chairman Nicholls,

I commend the City's Waste Management department for aggressively seeking to save taxpayer's money. That is a laudable goal. However, I am writing to state my vehement opposition to the proposed waste transfer station complex at Edith and Comanche.

I am an at home mom, who has lived 5 miles from the proposed site for 17 years (for 5 yrs we were 3 miles east and for 12 yrs we have lived 2 miles west). During these years, Comanche/Griegos has been a route that my family and I have regularly travelled. Many of those years I was either driving a carpool or riding with one of my teens, who was learning to drive. I also had many friends and neighbors who drove through the intersection, coming from Dietz Farms, Rio Grande and the Northeast Heights.

I have two main concerns:

1. Traffic. I believe that by rezoning the property and allowing WM to build their complex, you will be endangering the lives of automobile drivers, bicyclists and pedestrians in the North Valley--not to mention commercial truck drivers, garbage truck drivers and semi drivers immediately.

This is an already unsafe driving area because of the awkward mix of residential and commercial traffic, including large trucks. Further, the curvy nature of the road and lack of signals to stop or slow traffic make it in my mind preposterous to even contemplate the WM scenario.

2. I think it is an affront to the residents who live, go to school, and work in that area: the Greater Gardner Neighborhood, La Luz Elementary School, The North Valley Little League and New Mexico's Camino Nuevo Youth Center (CYFD) to name a few. What are you telling them if you approve WM's zoning request? The safety of their homes, schools and businesses, their health will be violated by increasingly dangerous traffic, increased noise and odors and decreased air quality. I hope you agree with me that they deserve better.

Sincerely,
Jen Parker
1613 Bayita Lane NW
ABQ, NM 87107

505/362-6046

Sent from my iPhone

rec'd 9/30/

Dumping On Ourselves: The Mess of the Proposed Edith Transfer Station

By Dan Waldman, MD

What's it worth to us for a fellow citizen to avoid a chronic illness? What's it worth to prevent a child's asthma exacerbation? How much per year is saved by preventing one more person living in poverty from exposure to poor air quality? How about a few thousand people? How should a community weigh the health impact of something like a sizable increase in diesel exhaust in comparison with a city's tax savings?

These are the questions that we need to be grappling with as the city moves forward with plans to locate a major "Transfer Station" in an area where 18,000 people live, and 9 public schools are located, which serve 4,833 students.

As a physician and the director of the UNM Family Medicine Residency, the largest supplier of primary care doctors to our state, I spend a lot of time thinking about the existing and potential harms that our communities face. Our training program is known for its curriculum addressing health factors that impact us on a population level. These are skills future front-line physicians need so they can advocate for the health of the communities they serve. After all, despite all the impressive bells and whistles of modern medicine, medical care only accounts for about 20% of the health of a population: the rest is outside physician control. The single largest contributors to our health are our social environments (i.e. discrimination, income) and physical environments (i.e. air quality, overcrowding).[1]

So, what's a transfer station? It's a dump more or less. A dump where the trash moves in, gets processed, and then goes to a landfill. The proposed Edith transfer station would process all of Albuquerque's trash. It requires a lot of large vehicle traffic to bring the trash to a transfer station and later haul it out, and large vehicles use diesel fuel.

Roads have to be reinforced, and the area needs to be rezoned. Incidentally, the rezoning process is supposed to be possible only when "the rezoning does not cause harm to the community." There is no debating that harm will be caused, the only debate is how much harm. Since one of the UNM Family Medicine clinics is located just about a mile from the proposed transfer station, this has gotten our attention- it's a potential threat to the community's health that we are working to improve.

Taking one potential harm: what do we know about the potential health effects of exhaust fumes, such as diesel exhaust? A growing amount it turns out, and the more we find out the worse it gets. A large study in Europe found a significant association between "particulate matter air pollution" (like diesel exhaust) and lung cancer rates.[2] Actually, multiple studies have demonstrated an increased risk of lung

---

[1] http://www.cdc.gov/socialdeterminants/FAQ.html

[2] Air pollution and lung cancer incidence in 17 European cohorts: prospective analyses from the European Study of Cohorts for Air Pollution Effects (ESCAPE). Lancet Oncol. 2013 Aug;14(9):813-22. Epub 2013 Jul 10.

cancer with diesel exhaust exposure.[3,4] The World Health Organization even recently classified diesel emissions as a known carcinogen. What's a safe amount? No one knows, but probably no amount is perfectly safe. According to the Environmental Protection Agency: *"The exposure response data in human studies are considered too uncertain to develop a carcinogenic unit risk for EPA's use.[5]"*

Supporters of the transfer station may feel the traffic increase isn't significant- but it's around a 170% increase in large truck traffic. Though the area looks industrial, looks are deceiving: there are over 7,500 housing units nearby. Part of the reason the area looks industrial is that over the past few years more and more waste management vehicles have been housed in the area (otherwise the 170% number would be even higher). It's time to draw a line in the sand and say "no more."

More bad news: a study in the New England Journal of Medicine found that a population of women had increased heart attacks, strokes, and deaths related to their exposure to pollution[6]. Consistently, studies show that living close to major roads is associated with wheezing and asthma in children[7]. Exposure to air pollution was found to be linked to gestational diabetes,[8] a disease that already affects many New Mexicans and worsens birth outcomes. Air pollution levels have even been associated with days lost from work.[9] The more we look, the more we find.

When an activity raises threats of harm to human health, precautionary measures should be taken even if some of the cause and effect relationships are not fully established. This is called the "precautionary principle." The proponent of the activity, rather than the public, should bear the burden of proof. In other words it shouldn't be up to citizens to make the definitive case that there will be harm, it should be up to those interested in the development of the transfer station to definitively prove it will be safe. Based on the existing evidence, you don't have to be an expert to realize the transfer station couldn't be proven to be safe, even if they used the newest trucks and building materials.

Will the transfer station save money? That's a question no one can truly answer, and the more certain someone is in their forecasting, the less you should trust them. It's much more complicated than tax dollars saved on fuel and vehicle maintenance; we'd need more advanced knowledge and modeling of exhaust harms than currently exists. This economic model, incidentally, ignores quality of life- a

---

[3] Exposure to diesel motor exhaust and lung cancer risk in a pooled analysis from case-control studies in Europe and Canada. Olsson AC. Am J Respir Crit Care Med. 2011 Apr;183(7):941-8. Epub 2010 Oct 29

[4] The Diesel Exhaust in Miners study: a nested case-control study of lung cancer and diesel exhaust. Silverman DT, J Natl Cancer Inst. 2012;104(11):855.

[5] http://www.epa.gov/region1/eco/airtox/diesel.html

[6] Long-term exposure to air pollution and incidence of cardiovascular events in women. Miller KA. N Engl J Med. 2007 Feb 1;356(5):447-58.

[7] Assessing the health benefits of air pollution reduction for children. Wong EY Environ Health Perspect 2004;112(2):226–32

[8] Preconception and early pregnancy air pollution exposures and risk of gestational diabetes mellitus. Robledo CA. Environ Res. 2015 Feb;137:316-22. doi: 10.1016/j.envres.2014.12.020. Epub 2015 Jan 17.

[9] Samet JM, Zeger SL, Dominici F, Curriero F, Coursac I, Dockery DW, et al. 2000b. The National Morbidity, Mortality, and Air Pollution Study. Part II: Morbidity and Mortality from Air Pollution in the United States. Research Report 94 Part II. Boston, MA:Health Effects Institute.

mistake. It also ignores the value of nearby homes (likely to fall) and the psychological effects on children of growing up somewhere the city brings its trash.

Future patients and insurers (including the state) will have to pay the hefty ER costs for an asthma flare, but as anyone who has dealt with even the smallest amount of ill health can attest, the true impact of illness goes beyond a dollar amount. I personally suspect this transfer station won't be as much as a cost savings for our city as it will be a cost shift.

Social determinants of health are the circumstances in which people are born, grow up, live, work, and age, as well as the systems put in place to deal with illness. In this case, the relevant determinants of health for citizens in this North Valley neighborhood are be about to change drastically- unless this project is halted.

While not surprising, it is absolutely shameful that the community who would bear this burden is 64.6% Hispanic, with 35.6% of the families living below the federal poverty line, per recent data obtained by Public Health professionals investigating the health impact. The area is more Hispanic and less wealthy than Bernalillo County as a whole. Minorities and the poor are already understood to have worse health outcomes in the United States and New Mexico. Simply put: the proposed development would not have gotten this far if the affected community was wealthier and had more time and disposable income to devote to fighting the process.

A truism of medicine is that preventing health problems is significantly more cost effective than paying for treatment: an ounce of prevention truly is worth a pound of cure. For this reason, it would be a costly mistake for our city to locate a transfer station this close to where so many people live and attend school.

Received
9-29-15

Rancho Guadalupe Homeowner's Association

PO Box 6126

Albuquerque NM 87197-6126

Mr. Peter Nicholls

September 28, 2015

600 2nd Street NW

Albuquerque NM 87107

Dear Mr. Nicholls

After reading the information available on the proposed transfer station, we feel it would be detrimental to the surrounding neighborhoods including our own. After touring a Waste Management land fill and watching the arrival and dumping of large trucks coming from transfer stations in Oregon, it became obvious to me that the traffic created and the unpleasant odors certainly outweighed any possible benefit to local neighborhoods.

I urge your committee to find a location that is not located in or near a residential neighborhood. That should not be difficult considering the open land in western Albuquerque.

Thank you for the opportunity to express our views and concerns.

Sincerely

James E Chittick

James E Chittick

President, Rancho Guadalupe HOA

September 28, 2015

Dear Mr Nicholls

Thank you for your consideration of my thoughts on the proposal to construct a Waste Transfer Station (WTS) at 4600 Edith Blvd, NE.

I am a family physician who has had the privilege of providing primary care for the Albuquerque community for the past 32 years. I am currently caring for patients at the UNM Center for Family & Community Health at 3401 4th St NW. Perhaps the most striking lesson I have learned in my time in practice is how incredibly important it is for people to live, work, learn and play in a healthy environment if they are to achieve the best possible health. As we all know, health is an essential element of being a productive member of society.

In addition to being a practicing physician addressing the health and illness of individual patients and families, I take seriously my responsibility as a citizen to support the accountability of local government to assure opportunities for healthy living. At a minimum, I expect our elected and appointed officials to avoid the creation of unhealthy and dangerous environmental conditions.

Given this background, I would like to share with you my specific concerns about the proposed Edith Transfer Station.

1. The increase in heavy truck and self-haul vehicle traffic will have a significant **negative impact on motor vehicle, bicycle and pedestrian safety**. This area already suffers from some of the highest rates of collision and injury; increased traffic will only increase the risk to those traveling in the area.
2. Diesel emissions, general traffic emissions and basic operation of the WTS will have a **negative effect on air quality** and will result in increased risks for lung diseases such as asthma and emphysema. I am particularly concerned because of the proximity to the new baseball fields which will expose children participating in Little League to harmful particulate matter and other pollutants.
3. Traffic and general operations will **increase noise exposure** which is well documented to contribute to sleep disturbance, increased stress and irritability in general and, most concerning, diminished learning capacity in children.
4. **Litter, odor, rodents and insects** are more prevalent in areas in proximity to Waste Transfer Stations and decrease the quality of life and sense of well-being of the local residents. In addition, this contributes to a vicious cycle of deteriorating property values which in turn further impacts quality of life negatively.
5. **Deterioration of roadways and buildings due to vibrations** from heavy truck traffic will have a harmful impact on the physical infrastructure of the community. The decrease in property values and loss of desirability for businesses to locate in the community resulting from this degradation of the built environment will have deep and long lasting impacts on the local economy.

In addition to these specific concerns, I am struck by the plan to locate this facility in an area of town which already struggles with a disproportionate burden of poor health, excess injuries, low income and limited education. For the reasons I have listed above, building the Edith WTS will most certainly **not** provide these families with the opportunity to achieve the best possible health.

This proposed WTS causes too many concerns, creates too many risks and jeopardizes the health of too many members of this area. As a health professional and a member of the Albuquerque community, I urge you not to approve this proposal.

Sincerely,

Sally Bachofer, MD, MS

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

From: Kelly O'Donnell, PhD

Date: September 28, 2015

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

Dear Mr. Chairman,

Thank you for the opportunity to share the results of my preliminary analysis of the 2014 update to the Albuquerque Transfer Station Feasibility Analysis.

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 city convenience centers are closed, a prospect opposed by Albuquerque residents. The finding of on-going net cost was arrived by city consultants even though their model greatly under-estimated project costs by failing to include costs imposed on the surrounding communities, meaning that the costs of the proposal exceed the benefits to an even greater extent than is acknowledged on page 10 of the consultants' 2014 Feasibility Study .

Waste facilities such as the waste transfer station (WTS) contemplated at 4600 Edith NE generate numerous negative externalities including significant health and safety risks. 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 $21 million in lost home values, job and productivity losses due to traffic congestion and environmental degradation, and a several hundred thousand dollar reduction in annual property tax revenue and lower gross receipts taxes. WOW! And how did you arrive at this figure – for us non-economists!

The 2014 feasibility study weighs the costs of constructing the proposed facility against the operational cost savings that will result from reducing the number of trips city vehicles take to the landfill. By these metrics, the transfer station appears to be a good investment for the city. But these results are skewed in favor of the project because the cost side of the equation fails to include the significant negative impact of a high volume waste facility on the businesses and residents of the surrounding community.

Homeowners will see a significant decline in property values. The over 500 area businesses may experience declining property values, diminished productivity due to traffic congestion and more adverse working conditions and reduced retail sales as streets become less walkable and the neighborhood environment is degraded. In addition, by damaging the public perception of the surrounding neighborhoods, the WTS is likely to diminish the community's future prospects for economic development and revitalization.

There are approximately 7,500 housing units with a combined value of over $300 million in the area surrounding the proposed transfer station. These homes house over 18,000 residents and generate over $4 million in annual property tax revenue. Proximity to the noise, congestion, odors and toxicities of a waste transfer station 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 two 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.

If homes in the area most likely to be impacted by the transfer station experience an average 7 percent decrease in value, residential property tax revenue will decrease by almost $300,000 annually and area homeowners will experience a $21 million decrease in their most valuable asset.

The tax revenue impact to local governments should be reflected in the feasibility analysis, but the impact on household assets is likely to be far more significant. Home equity is the largest asset held by most American households. For the low-and moderate-income homeowners in the area of the proposed transfer station their residence is often their *only* asset. 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. With real estate values still somewhat depressed, a 5 or 10 percent reduction in home value could diminish or even eliminate net worth for many neighborhood families.

The impacted area is home to a variety of retail and service sector businesses as well as food manufacturers, warehousing, and distribution. Business operations and profitability may be negatively impacted by increased traffic congestion and pollution. Businesses in the impacted area employ over 8,000, have annual payrolls in excess of $272 million, and generate over $20 million in gross receipts tax revenue for state and local government. A five percent reduction in revenue for these businesses could cost the economy hundreds jobs and tens-of-millions in economic activity.

The Health Impact Assessment of the transfer station provided 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 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 the utilize conservative assumptions.

Reducing the cost of solid waste disposal through development of a new transfer station is a laudable objective that warrants further study. However, any study should consider multiple sites and must accurately reflect all costs of the proposed project, including those absorbed by the surrounding community.

Sincerely,

Kelly O'Donnell, PhD

Quevedo, Vicente M.

From: Brito, Russell D.
Sent: Tuesday, September 29, 2015 9:04 AM
To: Quevedo, Vicente M.
Subject: Fwd: Solid Waste Transfer and Convenience Center proposed for Edith and Commanche

V,

Another comment.

Thank you,

- Russell

Begin forwarded message:

From: "Lubar, Suzanne G." <slubar@cabq.gov>
Date: September 29, 2015 at 8:55:20 AM MDT
To: 'Roger Hartman' <nmpops@gmail.com>, "Williams, Brennon" <bnwilliams@cabq.gov>
Cc: 'Roger Mickelson' <FHVHARoger@aol.com>, 'Geneiva Meeker' <genmeek100@centurylink.net>, 'Rose Sena HOA Singing Arrow' <roserealtor89@yahoo.com>, "'JOEVALLES@aol.com'" <joevalles@aol.com>, "'wood_cpa@msn.cl'" <wood_cpa@msn.cl>, "Brito, Russell D." <RBrito@cabq.gov>
Subject: RE: Solid Waste Transfer and Convenience Center proposed for Edith and Commanche

I will make sure that your e-mail is provided to the EPC. Thank you for your comments.
Best regards,
Suzanne

Suzanne Lubar
Planning Director
City of Albuquerque
600 2nd Street NW
Albuquerque, New Mexico 87102
(505) 924-3352 Direct
(505) 924-3339 Facsimile

From: Roger Hartman [mailto:nmpops@gmail.com]
Sent: Tuesday, September 29, 2015 8:46 AM
To: Lubar, Suzanne G.; Williams, Brennon
Cc: Roger Mickelson; Geneiva Meeker; Rose Sena HOA Singing Arrow; JOEVALLES@aol.com; wood_cpa@msn.cl
Subject: Solid Waste Transfer and Convenience Center proposed for Edith and Commanche

Please pass to Mr Peter Nicholls, EPC Chair.

Mr. Peter Nicholls
Environmental Planning Commision Chair

Mr Nicholls

The East Gateway Coalition of Associations opposes project 1010582, construction of a Solid Waste Transfer and Convenience Center proposed to be built on approximately 22 acres at Edith and Comanche. The traffic and noise associated with such a center would be seriously detrimental to the quality of life and property values in surrounding neighborhoods. Additionally, the increased traffic would be a safety issue. No neighborhood, unless the residents desire it, should be subjected to such after-the-fact change of use for any parcel of land. In this case, clearly they do not.

The East Gateway Coalition understands the City's desire to place such a facility close to the interstate highway, but urges the EPC to deny this request and to suggest the City find a place well away from developed neighborhoods for this facility.

Respectfully,

Roger Hartman
President, East Gateway Coalition of Associations

copy to: Inter-coalition

Chair: Peter Nicholls

Environmental Planning Commission

c/o Vicente Quevedo, Case Planner

Re: Statement in Opposition

North Valley Waste Transfer Station—Project 1010582

Greetings,

In the Matter of Project 1010582, *the Inter-Coalition Panel stands in opposition to the proposed construction of a Solid Waste Transfer Station and associated Convenience Center* on roughly 22 acres at Edith-Comanche. We base our opposition on potential adverse impacts to the surrounding neighborhoods and community.

The Legal Standards Set Out in City Resolution 270-1980 Are Not Met: A Request for a Zoning Map Amendment is a request for an exception to the carefully determined zone map; a document that reflects significant planning efforts on the part of the City and its residents. This is recognized in City Resolution 270-1980 which sets out only three circumstances where amendments are appropriate: (1) There was an error when the existing zoning map pattern was created; (2) Changed neighborhood or community conditions justify the change; or (3) A different use category is more advantageous to the community, as articulated in the Comprehensive Plan or other City master plan, even though (1) or (2) do not apply. In this proposal none of these circumstances exist to warrant the zone change request for the proposed project.

There are no circumstances supporting the first ground for approving an amendment to the zoning map. 1) There was no error when the existing zoning map pattern was created. 2) There are no circumstances supporting the second ground for approving an amendment to the Zoning Map, 'changed neighborhood and or community conditions.' 3) There are no circumstances supporting the 'more advantageous to the community' test.

The surrounding neighborhoods have spoken loudly and clearly that the adverse impacts of noise, traffic congestion and safety, property devaluations, etc. associated with the proposed project would detrimentally impact their health safety and general welfare. We believe the standards set in R-270-1980 were appropriately instituted to provide the surrounding community that protection.

With alternative city owned properties and existing facilities available, we believe the City should explore other locations remote from established neighborhoods.

For these and other reasons, the Inter-Coalition Panel strongly urges the EPC to deny this request.

Respectfully submitted for the Inter-Coalition Panel,

Dr. Joe L. Valles

COMMUNITY CONCERNS AND CONSIDERATIONS
Inter Coalition Panel

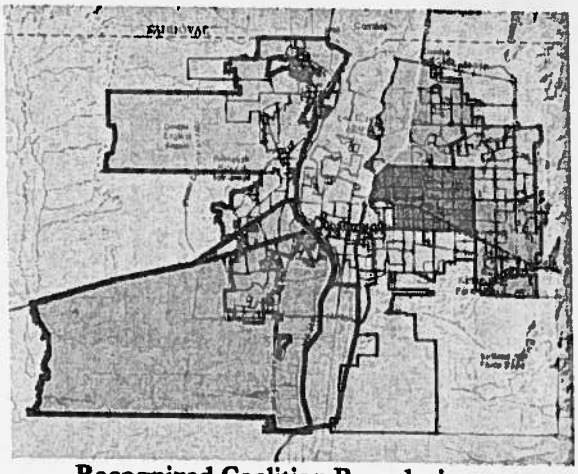
A common intelligence and wisdom exists out here with the public that is too often ignored by decision-makers encumbered with enormous logistical responsibilities and constant emerging problems—and politics. We also are forced to recognize that our Fourth Estate—the media—too frequently offers a superficial perspective on pertinent issues impacting the general public; issues that can't be captured in a sound bite or cursory flash news reporting.

We recognized that most organized neighborhood associations typically have common concerns and pressing issues that are mostly parochial in nature. We also understood that at the Coalition of Neighborhood Associations level, the focus was more on district-wide or regionally significant ('big picture') issues. However, we also accepted that not all Coalitions may be seeing the same big picture or at least; may not be viewing it the same way. That was the basis for inviting known Coalitions to coalesce toward a common cause.

This informal, collaborative organization, comprised of Coalitions of Neighborhood Associations from throughout the City of Albuquerque and Bernalillo County, has been meeting since May 2014 to reach consensus on broad, common concerns. Over a series of meetings, representatives identified several community-wide issues, each of which includes short—and long-range concerns and overlaps with other broadly labeled concerns.

Our Mission: The Coalitions of Albuquerque and Bernalillo County Neighborhood Associations will be proactive in important issues that affect all citizens by:

- Providing a means for neighborhoods and homeowner associations, through their respective Coalitions, to achieve and maintain communications on civic and neighborhood matters,
- Providing broader channels for effective interaction and communication with local, state, and federal governments to voice our concerns and recommendations,
- Providing for a means to preserve, protect, and enhance the quality of life for the citizens of Albuquerque and Bernalillo County, and Providing a collective voice on significant issues that affect us all—now and into the future.



Recognized Coalition Boundaries

THE OVERALL PRIORITY CONCERNS ARE:

- Albuquerque Police Department Reforms and a Diminishing Number of Available Police Officers
- Transparency in Government: Unresponsive-Obstructive Government
- Water: Inextricably Related to Overall Economic Development and the Region's Viability into the Future (Including Kirtland Jet Fuel Spill, Prolonged Drought Conditions, Infrastructure Deficiencies, Increased Demands for New Developments, etc).
- Office of Neighborhood Coordination: No longer the true Neighborhood Liaison as Originally Intended
- Education: Inextricably Related to Sound Economic Development and Future Viability—Real Concern is the Quality of Education.
- Economic Development: New Mexico and the Region are Falling Behind
- Mental Health Services: New Mexico and the Region have an Increasingly Severe Shortfall in Providing Mental Health Services.
- Land Use Policies, Affordable Housing, Code Enforcement: Inequitable Application of Policies—Residents Viewed as Obstructionists.
- Open Space: As the Region's Population Grows—Diminished Opportunities for Available Open Space
- Unused City Property: Albuquerque and Bernalillo County 'Acquire' Excess-Unnecessary Real Estate through a Number of Programs without Purpose.
- Transportation and Infrastructure: Projected Future Growth Estimates may be Highly Optimistic—Reality Dictates that Transportation and Infrastructure Planning Carefully Allocate Costs for Potential Needs Across Government Entities, Private Commercial and Residential Developers, and Future Occupants.

North Valley Health Impact Assessment of the Proposed Edith Transfer Station

August 2015

Prepared by:
William Hudspeth, Ph.D., Kitty Richards, MS, MPH
and
Kristine Suozzi, MS, Ph.D.

In collaboration with
The North Valley Health Impact Assessment Committee
and the North Valley Coalition

Reviewers:

Sally Bachofer, MD, Associate Professor, University of New Mexico, Department of Family & Community Medicine

Victoria Sanchez, MPH, Dr.PH, Associate Professor, Public Health Program, University of New Mexico, Department of Family & Community Medicine

Daniel Waldman, MD, Assistant Professor, University of New Mexico, Department of Family & Community Medicine

Nina Wallerstein, MPH, Dr.PH, Professor, Public Health Program, University of New Mexico, Department of Family & Community Medicine

This Health Impact Assessment was funded by County Commissioner Debbie O'Malley on behalf of the North Valley Coalition. Thank you to Commissioner O'Malley for funding the North Valley Health Impact Assessment process and report, and for her enthusiastic support of her community and its health and wellbeing.

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Figure 2. Characteristics of impacted communities near the proposed Edith Station site and the remainder of Bernalillo County.

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Figure 4. Census tracts underlying impacted community and 2-mile radius of site.

Figure 5. Traffic Pathway

Figure 6. Air Quality Pathway

Figure 7. Water Quality Pathway

Figure 8. Cumulative Impacts Pathway

Figure 9. Economic Wellbeing Pathway

Figure 10. Noise, Vectors, Odors, Litter Pathway

Figure 11. Occupational Safety Pathway

Figure 12. Age-adjusted chronic disease death rate per 100,000 persons, Bernalillo County and impacted community for non-Hispanic white and Hispanic, 2008-2011.

Figure 13. Life Expectancy from birth, Bernalillo County and impacted community for non-Hispanic white and Hispanic, 2011.

Figure 14. Age-adjusted motor vehicle related death rate per 100,000 persons, Bernalillo County and impacted community for non-Hispanic white and Hispanic, 2008-2011.

Figure 15. Map of proposed Edith Station transportation route.

Figure 16. Map of facilities with air pollution permits, schools, day care centers, and youth detention facility within 2-mile radius of Edith Station.

Figure 17. Death rates for lower respiratory tract disease (chronic lower respiratory diseases – ICD10: J40-J47) in Hispanics and non-Hispanic whites in the impacted community and Bernalillo County.

Figure 18. Death rates for cardiovascular disease (Heart disease – ICD10: 100-109, I11, I13, 120-151) in Hispanics and non-Hispanic whites in the impacted community and Bernalillo County.

Figure 19. Death rates for strokes (Cerebrovascular diseases – ICD10: 160-169) in Hispanics and non-Hispanic whites in the impacted community and Bernalillo County.

Figure 20. Mean July maximum temperatures, Albuquerque, NM.

Figure 21. Map showing drains and laterals the SWD site and surrounding area.

Figure 22. Campylobacor Infections (2006-2014): Age-adjusted rates.

Figure 23. Cryptosporidiosis Infections (2006-2014): Age-adjusted rates.

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EXECUTIVE SUMMARY

This Health Impact Assessment (HIA) was done to assess the impacts of a Waste Transfer Station (WTS) on the health of residents and others who live, work, attend school, or play in neighborhoods that are located near the site. These neighborhoods correspond with census tracts 32.01, 32.02, 30.01, and 29. If constructed, garbage trucks will haul up to 5 million pounds of waste per day to the WTS for transport by semi-trucks to the Cerro Colorado Landfill (Gordon Environmental Inc., 2015). The City of Albuquerque (COA) is proposing to build their WTS at the current 22-acre site of their Solid Waste Department (SWD) located at the corner of Comanche Rd. and Edith Blvd.

The COA has stated the WTS will benefit the neighborhood because of reduced air pollution, nearby access to a household hazardous waste drop-off center (which the neighbors currently have at Rinchem), nearby access to a convenience center for self-hauled waste, and neighborhood beautification attributed to the WTS's state-of-the-art design. Further, the COA has stated the WTS will reduce their solid waste costs.

Based on figures from the U.S. Census, a total of 18,187 people live in the impacted community (Census, 2013). The neighborhoods are more racially and ethnically diverse than Bernalillo County, with 64.6% of the population comprised of minorities, and 35.6% of the population living below 100% of the federal poverty level ($24,250 for a family of four). Some neighborhoods within the impacted community have experienced over five decades of persistent poverty (Joint Center for Political and Economic Studies, 2012). Sensitive populations close to the proposed site include residents who live in an apartment complex at the corner of Edith Blvd. and Rankin Rd., detainees at the nearby Youth Detention Center on Edith, children who play at the baseball field across the street from the proposed site, and students who attend nearby La Luz Elementary on Griegos.

Environmental and health data assessed for this report indicate residents bear a disproportionate environmental and health burden. Due to this burden and the neighborhoods' socio-economic and demographic composition, the impacted community meets the U.S. Environmental Protection Agency's (EPA) criteria for an environmental justice neighborhood.

Residents and business owners/managers living and working in the impacted community have the following concerns:

1. The WTS's impact of heavy truck and self-haul private vehicle traffic on motor vehicle, pedestrian and bicycle safety; noise levels; traffic congestion; air quality from diesel emissions; and the deterioration of roads and home foundations from truck vibrations.
2. The impact of WTS operations on air quality.
3. The impact of WTS operations on the antiquated sewer infrastructure, ground water quality, surface water quality, and flooding.

4. The cumulative impacts from the WTS, and other existing industrial facilities, on human exposures - particularly for sensitive populations.
5. The impact of the WTS on the local economy and economic wellbeing in terms of property values; recruitment of new businesses and new jobs to the area; slower freight delivery rates for area businesses; and land-use incompatibility with nearby food distribution companies.
6. The impact of WTS operations on noise, pests, odor, and litter.
7. The impact of WTS operations on worker safety due to the hazardous nature of working at WTSs.
8. The impact of the WTS on increased household hazardous waste volumes coming into the community.
9. SWD's history of poor enforcement and cleanup at the current SWD facility, the site of the proposed WTS.
10. Inadequacy of advanced notice to the affected community and an absence of public input into the WTS siting decision or siting criteria.

Predictions

Based on analysis of health outcome data by location, race, and ethnicity, the HIA concludes the WTS will contribute to existing health disparities among Hispanics and sensitive populations, and to poorer health among all population groups living in the impacted neighborhoods.

Findings

Overall

This Heath Impact Assessment (HIA), conducted by Dr. Hudspeth, Ms. Richards, and Dr. Suozzi, in collaboration with residents and business owners/managers living and working in the impacted neighborhoods, concludes the WTS does not provide for the health, safety and welfare of residents living in adjacent neighborhoods as required by Enactment 270-1980.

With the exception of a preliminary Traffic Impact Study, the COA's focus has been within, rather than outside of the WTS site's boundaries. Consequently, the COA has failed to consider health impacts that might harm residents living in neighborhoods close to the site, should the WTS proceed. As an example, although the COA claims the WTS will help the general community by providing benefits such as reductions in air pollution, the COA has not provided air quality data to substantiate their claim.

Process

Neighborhood residents learned about the proposed WTS through an Op Ed on a solid waste rate hike to pay for the WTS. In contrast to guidance by the EPA to involve impacted residents in the development of WTS site criteria and the site selection processes, the COA made an internal decision to locate the WTS at the site of their current SWD facility. Criteria, other than within 3 miles of the I-25/I-40 Interchange, used by the COA for their selection of the proposed WTS site have not been provided to residents of the impacted community. The COA has also failed to provide a cost-benefit analysis comparing the proposed site with alternative sites.

Traffic

229 additional round trips into and out of the WTS are expected to occur each weekday, a 173% increase from current round trips (132) made by SWD's heavy truck fleet. Together, heavy trucks will make a total of 361 round trips into and out of the WTS each weekday. These round trips do not include privately owned vehicles that will be self-hauling trash to the WTS's convenience center. The COA estimates the convenience center will receive 225 round trips by private self-haul vehicles each weekday and 300 round trips each Saturday and Sunday. The COA's preliminary Traffic Impact Study did not include the additional volume of garbage trucks coming into and out of the impacted community because the study assumed that garbage truck traffic would occur during off-peak hours. MRCOG has classified Pan American East - South of Comanche, and Comanche - West of Pan American East, as severely congested (volume to capacity ratio of 1.1 to > 1.5). Traffic generated by the WTS will increase congestion along these key roadways.

Hispanics of the impacted community experience disproportionately high death rates for health outcomes associated with traffic, including cardiovascular disease; cerebrovascular disease; lower respiratory disease; and vehicle related fatalities, which are 12 deaths per 100,000 persons compared to 5.9 deaths per 100,000 persons for non-Hispanic whites.

Area bicyclists have stated that heavy truck traffic, poor physical road conditions, and a lack of safety are currently the main barriers to using the Comanche bicycle facility. With additional heavy truck and vehicle traffic, barriers to using the Comanche and Edith bicycle facilities will increase. Safety risks to children who attend nearby La Luz Elementary School and who play Little League at the baseball field located across the street from the proposed WTS will increase as well. Several intersections within the impacted community experience extremely high vehicle collision rates that result in death, involve pedestrians, or involve bicyclists (Table 1).

Table 1. Collision rates at intersections within the impacted community.

Collision Rates	**Overall Collision Rates**	**Fatal and Injury Collision Rates**	**Pedestrian Collision Rates**	**Bicycle Collision Rates**
Up to 3 times above the average collision rate	4th Street and Griegos intersection	4th Street and Griegos intersection	N/A	N/A
Up to 2 times above the average collision rates	Edith and Comanche intersection	Edith and Comanche intersection	4th Street and Montano	4th Street and Montano
	I-25 and Comanche intersection	I-25 and Comanche intersection		2nd Street and Montano

Air Quality
Although the COA claims the WTS will benefit the general community because of a decrease in overall air pollution (from the reduction of garbage trucks travelling to and from the Cerro Colorado Landfill, which will be substituted by semi-trucks), there has been no air quality data provided to support their claim. Air pollution from increased diesel emissions and WTS operations in the impacted community will increase. Based on air quality records for the air monitoring station located closest to the site, measured concentrations for particulate matter have almost exceeded EPA's current standard of 150 ug/m3 on several occasions.
Although the affected neighborhoods comprise only 2.7% of Bernalillo County's population, more than 15% of facilities permitted to emit air pollutants are located within a 2-mile radius of the proposed WTS site.

With the opening of a new baseball field across the street from the proposed site, children who are playing Little League will be adversely impacted. Consideration of the health impacts from diesel emissions to children's health, which remains unaddressed by the COA, is critical given children's greater vulnerability due to lung development and higher respiratory rates.

Water Quality
Due to the gradient of the proposed site, from a high point on the eastern boundary of the site to a low point on the western boundary, and impervious surfaces, storm water runoff from the site has resulted in flooding of business properties that are located down-gradient of the site. In addition to flooding, residents are concerned about the presence of contaminants associated with WTS operations that could be carried by storm water runoff into the historic Alameda Lateral and the Rio Grande.

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. According to EPA's Enforcement and Compliance History online site, the COA has a poor compliance record for water related discharges. The COA has provided little information on how they will contain storm water runoff, given the site's gradient.

Noise
The presence of prolonged loud noise contributes to the loss of sleep, increased stress levels, irritability, and diminished learning capacity among children. The major sources of noise related to the proposed WTS are the increases in traffic volume, the types of traffic, and overall operations. The noise level produced by one heavy diesel truck is equivalent to the noise produced by 32 passenger cars. Noise measurements taken in May-June of 2015 exceeded the COA's noise standards for the morning and the afternoon at all locations measured, including at La Luz Elementary. Of the schools within 2 miles of the proposed site, La Luz Elementary - the school located the closest to the proposed WTS site (.72 miles), has the highest percentages of Hispanic students, the highest percentages of students who receive free or reduced cost lunches, the lowest school rating of D, and the lowest

percentages of students who are proficient in reading and math, 34%, and 26.2%, respectively (Albuquerque Public Schools, 2013).

The COA has not provided data on the anticipated noise levels that would occur should the WTS proceed. The COA has failed to assess the health impacts from increased noise levels on the health and wellbeing of those who live in an apartment complex close to the proposed site (.03 miles), attend school at La Luz Elementary, and play Little League at the baseball field. It is predicted that noise associated with heavy trucks will contribute to stress levels and deter work and school performance.

Odor, Litter, Rodents, Insects

Waste contributes to the presence of odors, litter, and disease carrying rodents and insects negatively affecting residents' overall quality of life and sense of wellbeing. Residents who live close to WTSs in other communities have reported that odors and pervasive dust from WTSs aggravate their allergies (National Environmental Justice Advisory Council, et al., 2000). WTSs are also associated with increased litter contributing to disease carrying rodents and insects, and possible vector-borne diseases. The COA has not provided data on the WTS's impact on illegal dumping, litter, and disease carrying vectors. Due to the presence of waste streams associated with the WTS and based on reports from other residents who live adjacent to WTSs, the authors conclude the WTS will contribute to increases in odors, litter, illegal dumping, and disease carrying insects and rodents.

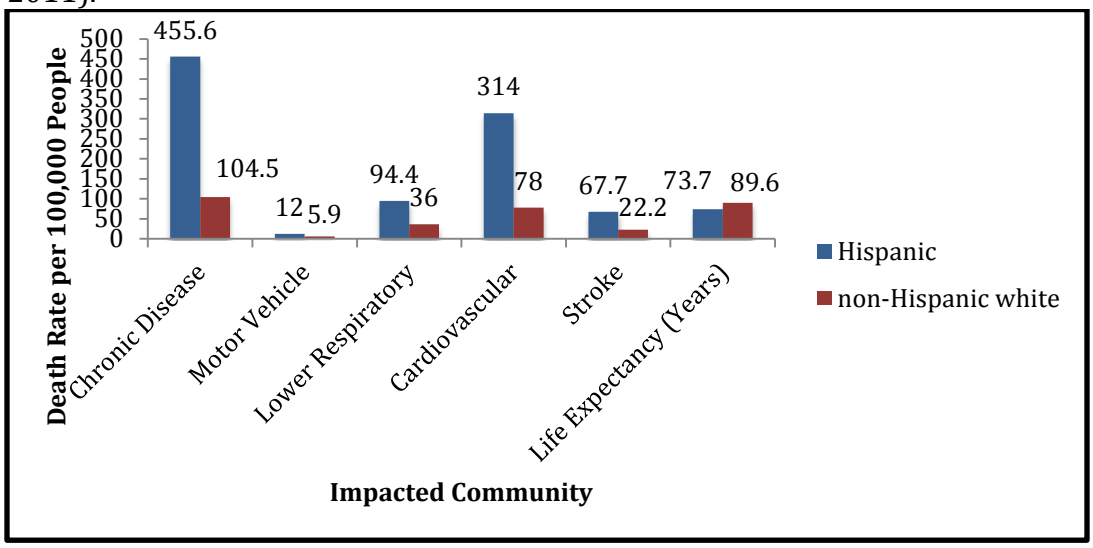
Occupational Health

Refuse and recyclable material collection is the fifth most dangerous industrial occupation in the U.S., with death rates averaging 30 per 100,000 persons (U.S. Department of Labor, 2014). Hazardous conditions include exposures to loud noise, toxic chemicals, odors, physical exertion, and heat. These conditions contribute to high death rates from unintentional injuries and cardiovascular disease. When compared with Bernalillo County, the impacted community currently experiences higher death rates for unintentional injuries, 70.3 deaths vs. 58.7 deaths - per 100,000 persons, and cardiovascular diseases, 314.5 deaths vs. 78 deaths - per 100,000. Depending on COA's policies regarding the employment of impacted residents, the impacted community's existing health burden could increase.

Cumulative Impacts and Environmental Justice

Hispanic residents of the impacted community currently experience a disproportionate health burden when compared with non-Hispanic residents of the impacted community (Figure 1). HIA results indicate that the health of our most vulnerable populations - children, the poor, and minorities will be disproportionately affected, should the WTS proceed.

Figure 1. Ave. annual age-adjusted death rates per 100,000 persons and life expectancy by Hispanic and non-Hispanic white in the impacted community (2008-2011).



Title VI of the Civil Rights Act of 1964 offers protection for minority populations against intentional and unintentional discrimination. Title VI precludes any agency from deeming a site suitable or locating a facility where it will have discriminatory effects on the basis of race, color, or national origin (40 CFR Section, 7.35 (c)).

The COA has not provided data on the cumulative impacts that could occur as a consequence of the WTS and the effect of cumulative impacts on our most vulnerable residents. The proposed site for the WTS follows a disturbing historical trend that many of today's municipalities are attempting to reverse - the siting of WTSs in low-income and minority communities.

Economic Wellbeing

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 closeness to the proposed WTS. In their feasibility studies, the COA has focused solely on the cost savings to their operations without consideration of costs to area businesses from delays in freight shipments or increased worker's compensation claims, or costs to residents from decreased property values.

Recommendations

The NV HIA Committee recommends denial of the COA's request for a zone change to Special Use and recommends that the COA evaluate alternative sites that are more protective of human health. The COA has failed to provide data on the impacts of the WTS to the health and wellbeing of residents living in the impacted community. HIA findings suggest the proposed WTS will result in 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.

Introduction

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). The Coalition wanted to assess the broad health impacts the proposed WTS might have on residents and businesses. A HIA is a tool that is used to assess the potential, and sometimes unintended, effects of a proposed project on the health of a community. To meet professional standards, HIAs must adhere to the minimum requirements established by the HIA Practice Standards Working Group (2014).

The Proposed Facility

The COA is proposing to build a WTS, named the Edith Station, 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).

According to the U.S. Environmental Protection Agency (EPA), WTSs are "facilities where municipal solid waste is unloaded from collection vehicles and briefly held while it is reloaded onto larger long-distance transport vehicles for shipment to landfills or other treatment or disposal facilities" (EPA, 2015). A convenience center is a collection-point for residents to drop-off their waste.

If constructed, the COA's 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.

The COA will dump up to 2,500 tons, equivalent to 5 million pounds, per day at the Edith Station for transport by semi-trucks to the Cerro Colorado Landfill (Gordon Environmental Inc., 2015). This change in SWD operations to a proposed WTS would result in a 173% increase in the number of round trips made by heavy trucks into and out of the community, and the Edith Station, each day. This figure does not include SWD employee vehicles or private vehicles that would self-haul their loads to the convenience center.

It is noteworthy the COA's contracted Traffic Impact Study did not include the additional volume of garbage trucks coming into and out of the impacted

community because the study assumed that garbage truck traffic would occur during off-peak hours.

The timeline for the Edith Station is: Planning Design (2014-2015), Permitting Processes (2015-2016), Funding Approval (2016), and Construction (2016-2018). The COA states that the Edith Station will cost $38.8 million, will result in annual savings of $2.5 million to $4.4 million, and will improve air quality because of fewer vehicle miles travelled (Edith Station Fact Sheet). Further, COA has stated they selected the current SWD facility site because it would eliminate the need to purchase other property for the WTS. During public meetings, COA staff mentioned the Edith Station would benefit adjacent communities by offering a nearby household hazardous waste drop-off center (even though there is currently a household hazardous waste drop-off center at nearby Rinchem) and a convenience center. COA staff also mentioned the WTS would beautify the neighborhood, and that although the SWD had been a bad neighbor in the past, they now intended to be a good neighbor (City of Albuquerque, Edith Transfer Station, public meeting, January 20, 2015).

The Edith Station is part of a larger COA vision begun in 2002 and articulated in the Albuquerque Integrated Waste Management Plan. The Plan recommends that the COA conduct an inventory of City-owned land according to criteria for the future siting of a WTS, Materials Recovery Facility, and Multi-Purpose Resource Recovery Park. Part of the COA's vision has already been realized with the opening of Friedman Recycling, a Materials Recovery Facility, in July of 2012. Friedman Recycling, at 5029 Edith Blvd., is located 1/3 mile from the SWD facility and processes over 120,000 tons of recyclable material each year, equivalent to 657,534 pounds per day. Some of the material originates from households and commercial businesses throughout Albuquerque and is transported to Friedman by SWD's recycling truck fleet.

The Affected Business and Residential Community

The community learned about the COA's proposed Edith Station after reading an Albuquerque Journal Op Ed, dated May 29, 2014, on a scheduled rate change for solid waste collection. After reading the Op Ed, community residents questioned the COA regarding its plans to place a WTS in their community and the City's lack of transparency, resulting in an absence of community notification or input into the site selection process. Already the home to Friedman Recycling and Rinchem's hazardous waste drop-off center, community members living close to the proposed Edith Station believe their community has become, and will continue to be, Albuquerque's ground zero for waste (public meeting, January 2015).

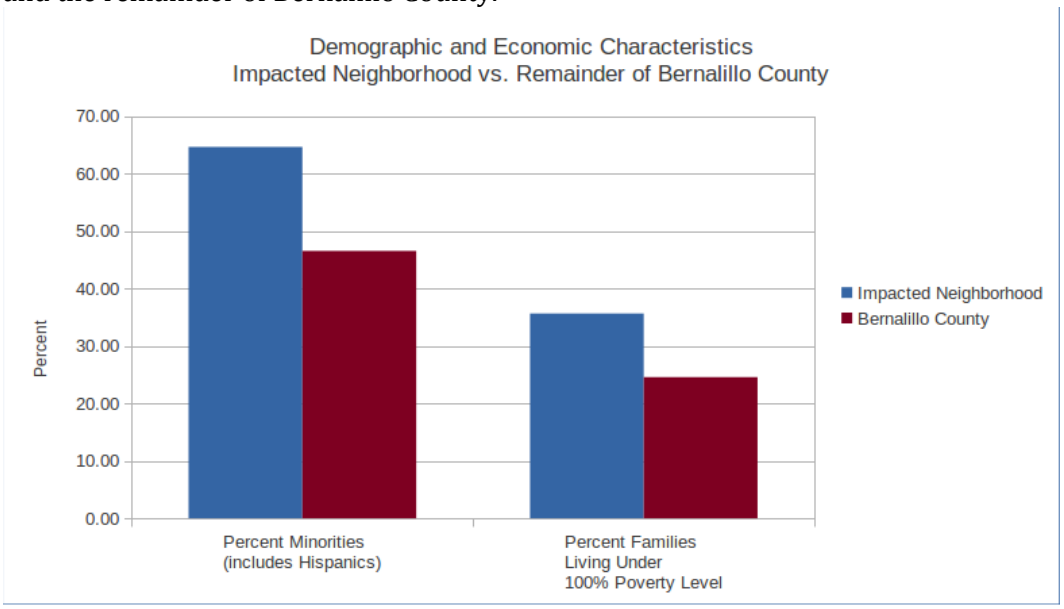
The proposed location of the Edith Station follows a disturbing historical trend. Prior to 2000, a majority of WTSs had been placed in vulnerable communities that were predominantly minority or low-income. In fact, in response to this trend, the EPA has published several resources, including, *A Regulatory Strategy for Siting and*

Operating Waste Transfer Stations: A Response to a Recurring Environmental Justice Circumstance: The Siting of Waste Transfer Stations in Low-Income Communities and Communities of Color (2000); *Hazardous Waste in Your Community* (2000); and *Waste Transfer Stations: A Manual for Decision-Making* (2002). It is important to note that all of these resources recommend working with affected communities ***prior to*** siting decisions.

Those living closest to the proposed Edith Station site, and the most likely to be adversely affected, are from the Greater Gardner, Stronghurst and Near North Valley communities. These communities correspond with Census Tracts 29, 30.01, 32.01, and 32.02, and with the New Mexico Department of Health's (NMDOH) Small Area 19. Together, these communities are predominantly minority (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 minority population is 46.5%, with 24.6% living below the federal poverty level (Figure 2). In 2013, 18,420 people lived in census tracts 29, 30.01, 32.01, and 32.02 (Census, 2013). The closest residences are .03 miles from the proposed Edith Station site, a group of apartments located at the NE corner of Rankin Rd. and Edith Blvd.

These communities experience greater health burdens when compared with other neighborhoods in Bernalillo County. A child born in this area can expect to live 2 years less than children living elsewhere in Bernalillo County. Life expectancy is 76 years, while life expectancy for other areas of Bernalillo County is 78. Deaths from chronic disease are also greater with 564 deaths per 100,000 persons, compared with the chronic disease death rate for the remainder of Bernalillo County of 498 deaths per 100,000 persons.

Figure 2. Characteristics of the impacted community near the proposed Edith Station site and the remainder of Bernalillo County.



Nearby businesses that are likely to be affected include: Sysco, Roto-Rooter, American Home Furniture, Premier Distributing, North American Moving Services, United Parcel Service, ABC Supply Co., Public Service Company of New Mexico, New Mexico Gas Company, Conway Electric, and Maloy Mobile Storage, among others.

Residents' and Businesses' Concerns Regarding the Proposed Edith Station:

11. The impact of heavy truck and self-haul private vehicle traffic on motor vehicle, pedestrian and bicycle safety; noise levels; traffic congestion; air quality from diesel emissions; and the deterioration of roads and home foundations from truck vibrations.
12. The impact of Edith Station's operations on air quality.
13. The impact of Edith Station's operations on the antiquated sewer infrastructure, ground water, downstream surface water quality, and surface water drains.
14. The impact of Edith Station's operations on flooding.
15. The cumulative impacts from the Edith Station, and other existing industrial facilities, on human exposures - particularly for sensitive populations such as students who attend La Luz Elementary, Mountain Mahogany, and the Menaul School; children who play Little League at the nearby baseball field on Edith Blvd.; and detainees of the Youth Detention Center.
16. The impact of the Edith Station on the local economy and economic wellbeing in terms of property values; recruitment of new businesses and new jobs to the area; slower material delivery rates for area businesses; and land-use incompatibility with nearby food distribution companies.
17. The impact of Edith Station operations on noise, pests, odor, and litter.
18. The impact of Edith Station operations on worker safety due to the hazardous nature of working at WTSs.
19. The impact of the Edith Station on increased hazardous waste volumes coming into the community.
20. SWD's history of poor enforcement and cleanup at the current SWD facility, the site of the proposed Edith Station.
21. Inadequacy of advanced notice to the affected community and a complete absence of public input into the siting decision or siting criteria.

Each of these concerns, along with potential health impacts, will be addressed in this report.

Background

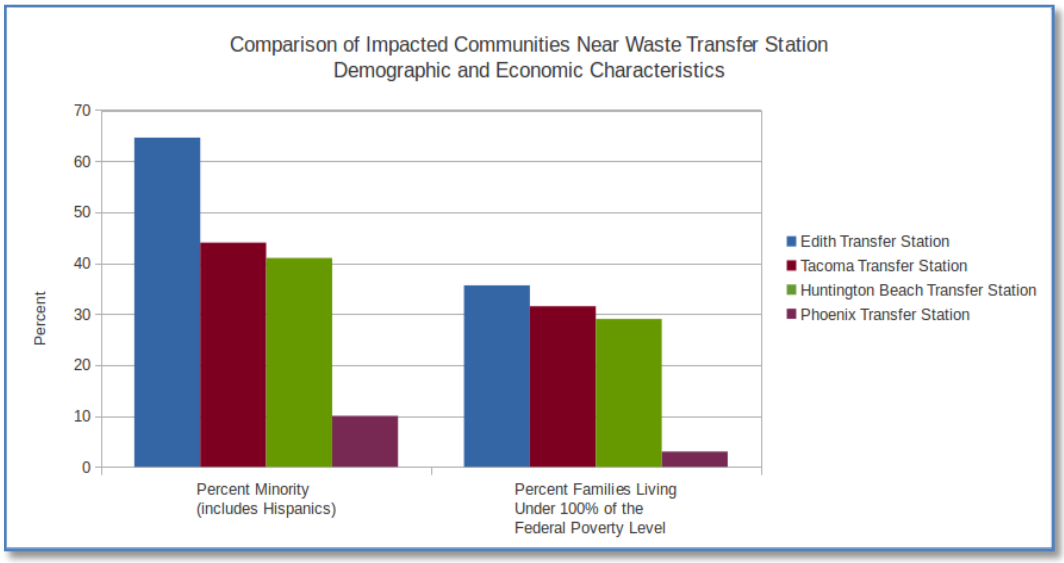
Feasibility Study

JR Miller and Associates, the consulting firm contracted by the COA to manage various aspects of the proposed Edith Station, contracted with the COA in 2011 to complete a Feasibility Study for a WTS (JR Miller & Associates, 2011). In 2014, JR Miller & Associates produced an Addendum to the 2011 Feasibility Study using recent cost estimates (JR Miller & Associates, 2014). 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 (a rank three plan adopted by the COA in 1993), the 2011 Feasibility Study, and the 2014 Addendum only considered one site - the site of the current SWD facility.

Site Selection Process

JR Miller & Associates has been a consultant for the siting, design, or construction of WTSs in other states. Figure 3 presents a summary of demographic and socioeconomic characteristics for the census tracts adjacent to the proposed Edith Station as well as other WTSs that have been sited, designed or constructed by JR Miller & Associates. JR Miller & Associates has followed the national historical trend of locating WTSs in low-income and minority communities, with the exception of the more recently developed Phoenix WTS, which is appropriately sited close to major thoroughfares, yet on the outskirts of population centers and away from low-income and minority communities. Notably, when compared with the location of WTSs in other communities, the census tracts adjacent to the Edith Station have a greater percentage of minority (64.6%) and low-income populations (35.6%).

Figure 3. Socio-economic and demographic characteristics of census tracts adjacent to the Edith Station compared with other WTSs sited, designed or constructed by JR Miller.



Lack of Public Input
Well after the COA decided on the current SWD site for their WTS, at a COA sponsored public meeting, a local resident asked whether the COA provided the community with an opportunity to comment on the proposed site (public meeting, January 20, 2015). COA management responded that an opportunity for public comment had been provided to the community when the Feasibility Study was approved by the City Council. In fact, there was little opportunity to provide public comment on the Feasibility Study, much less the siting decision, during this City Council meeting because approval for the Feasibility Study was placed on the Consent Agenda and was not discussed (COA, City Council meeting, May 19, 2014). Instead, the City Council meeting was devoted to issues surrounding the violent behavior exhibited by some members of the Albuquerque police force.

When asked by another resident at the same meeting whether the COA had considered other sites, COA management responded that they had considered other sites that were within 3 miles of the I-25/I-40 Interchange and had decided, ***internally***, that the site of the current SWD best met their criteria (public meeting, January 20, 2015). According to COA management, other sites that the COA considered included the current site of American Furniture, located at 801 Comanche Blvd., NE, near I-25; and the site of Albuquerque's now defunct Beach Water Park, closed in 2004. Based on literature summarizing preferable siting of WTSs, either of these sites would have been preferable to the proposed Edith Station site because they are located along the I-25 frontage road and farther away from residential areas (EPA, 2002).

To date, criteria, other than within 3 miles of the I-25/I-40 Interchange, used by the COA for the their selection of the proposed Edith Station site have not been provided to the public nor has there been any consideration by the COA on the placement of smaller WTSs throughout the city, rather than a large, single WTS.

With the decreasing capacity of many of the country's landfills, there have been many more WTSs constructed to handle municipal waste disposal demands. Due to the historical pattern of siting many of these in low-income and minority communities, the 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*** (EPA, 2002)**.**

Approval Process
Prior to constructing the proposed Edith Station, the COA, as the applicant in this case, must first go through several processes, including: 1) a request for a zone change from the current M-1 zone, which prohibits a WTS, to Special Use; 2) a request for a solid waste permit from the New Mexico Environment Department, and 3) a request for an air quality permit from the COA's Air Quality Division.

Change of Zone Status - Environmental Planning Commission

The applicant plans to go before the Environmental Planning Commission (EPC) to request a change in zoning from M-1 to Special Use on October 8, 2015. As part of the EPC hearing, the burden is placed on the applicant to demonstrate that all conditions of the COA's Resolution 270-1980: Policies for Zone Map Change Applications, approved 12-3-1-80 (COA, R-270-1980), and updated as COA Zone Code Enactment 270-1980 (2002) cited below, 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.

For approval, according to COA Zoning Code, Appendix B: Enactment 270-1980 (2002), the proposed zone change must meet each of the following:

A. A proposed zone change must be found to be consistent with the health, safety, morals, and general welfare of the City.
B. Stability of land use and zoning is desirable; therefore, the applicant must provide a sound justification for the change. The burden is on the applicant (again, in this case the City) to show why the change should be made, not on the City to show why the change should not be made.
C. 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 that have been adopted by the City.
D. The applicant must demonstrate that the existing zoning is inappropriate because;
    1) There was an error when the existing zone map pattern was created, or
    2) Changed neighborhood or community conditions justify the change, or
    3) A different use category is more advantageous to the community, as articulated in the Comprehensive Plan or other City master plan, even though (1) or (2) above do not apply.
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.
F. A proposed zone change which, to be utilized through land development, requires major and un-programmed capital expenditures by the City may be;
    1) Denied due to lack of capital funds, or
    2) Granted with the implicit understanding that the City is not bound to provide the capital improvements on any special schedule.
G. The cost of land or other economic considerations pertaining to the applicant shall not be the determining factor for a change of zone.
H. Location on a collector or major street is not in itself sufficient justification of apartment, office or commercial zoning.
I. A zone change request that would give a zone different from the surrounding zoning to one small area, especially when one premise is involved, is generally called a spot zone. Such a change of zone may be approved only when;
    1) The change will clearly facilitate the realization of the Comprehensive Plan and any applicable adopted sector development plan or area plan, or

2) The area of the proposed zone change is different from the surrounding land because it would function as a transition between adjacent zones; because the site is not suitable for the uses allowed in any adjacent zone due to topography, traffic, or special adverse land uses nearby; or because the nature of structures already on the premises make the site unsuitable for the uses allowed in any adjacent zone.

J. A zone change request which would give a zone different from surrounding zoning to a strip of land along a street is generally called strip zoning. Strip commercial zoning will be approved only where:
   1) The change will clearly facilitate the realization of the Comprehensive Plan and any adopted sector development plan or area development plan, and
   2) The area of the proposed zone change is different form surrounding land because it could function as a transition between adjacent zones or because the site is not suitable for the uses allowed in any adjacent zone due to traffic or special adverse land uses nearby.

At their first COA sponsored public meeting, the applicant reported that the proposed Edith Station would be beneficial to the community's health, safety, and general welfare for the following reasons:

1. The general community would benefit from reduced air pollution because trips to the landfill by garbage trucks would be eliminated.
2. The adjacent community would benefit from having a nearby convenience center and household hazardous waste drop-off center (which it already has at the nearby Rinchem facility) and would no longer be required to drive farther distances to dispose of their self-hauled waste.
3. The adjacent community would benefit because the Edith Station's state-of-the-art and energy efficient design would beautify their neighborhood.
4. The Edith Station would reduce SWD expenditures because: 1) it would be located on land already owned by the COA, and 2) it would result in reduced fuel costs due to fewer trips to the landfill.

Several of the requirements of COA Zoning Code, Appendix B: Enactment 270-1980 cannot be met, so the proposed zone change should not be approved for the following reasons:

1. Based on HIA findings, the proposed Edith Station will harm, rather than benefit, the adjacent community. Therefore, conditions A; B; C; D (1), (2), (3); E, and I (1), (2) have not been met.
2. The applicant's suggestion that the site of the Edith Station would economically benefit the COA because they own the land is irrelevant because, according to G above, "the cost of land or other economic considerations pertaining to the applicant shall not be the determining factor for a change of zone".
3. The proposed Edith Station is a use that is in significant conflict with the North Valley Area Plan (1993). In fact, Goal 3 on page 5 states, "To preserve air, water and soil quality in the North Valley. To prohibit hazardous waste

disposal sites and transfer stations and solid waste disposal sites; and to address problems of individual waste disposal systems on lots of inadequate size". Further, Council number R-255, Enactment 60-1993, Section 7, states, "Solid Waste Transfer Stations shall be allowed in the North Valley Plan area only on land zoned for manufacturing uses and only if after thorough investigation of relative benefits and costs, such location is deemed appropriate and the potential impacts on adjacent residential land can be mitigated through site design". Thus far, there has been no effort by the COA to investigate the relative benefits and costs of locating a WTS in the impacted community versus elsewhere, nor has there been an attempt to assess potential impacts on adjacent residential land. Further, little information has been provided to residents on the criteria used by the COA for siting the proposed Edith Station at the current SWD facility. Additionally, while the COA had an opportunity to assess the feasibility of locating a WTS elsewhere, they chose not to and only considered the current SWD facility site for the WTS.

4. The proposed Edith Station is in conflict with the recently adopted Complete Streets Ordinance, Council number C/S 0-14-32. For example, on page 3 the Complete Streets Ordinance says of transportation routes within the applicable *Central Urban Area*, "To express the City's commitment to creating and maintaining Complete Streets within the Central and Established Urban Areas specified by the Albuquerque/Bernalillo County Comprehensive Plan…for residents and visitors, regardless of their age, ability, or financial resources, to safely and efficiently use the public right-of-way within these corridors and meet their transportation needs regardless of their preferred mode of travel". The bike facility on Comanche is a primary bike facility that traverses the city east and west. As such, in keeping with the intent of the Complete Streets Ordinance it is important to ensure safe multi-modal passage near and around the proposed Edith Station. Many in the bicycling community feel that the Comanche bike facility is already unsafe and prohibits multi-modal accessibility. Bicyclists feel that with the additional heavy truck and vehicle traffic generated by the Edith Station, current unsafe multi-modal accessibility issues will become even greater.
5. The proposed Edith Station is a use that is also in significant conflict with the Comprehensive Plan's *Established Urban Area* and *Central Urban Area* goals and policies (the applicable land-use categories for the proposed Edith Station site) as illustrated in table 2. Additionally, other important goals and policies of the Comprehensive Plan will not be met (Table 2).

Table 2. List of Comprehensive Plan Goals and Policies **Not** Met by the Proposed Edith Station (Source: Albuquerque/Bernalillo County As Amended 2003 Comprehensive Plan, Section II. Goals and Policies)

Topic	Goal Language	Reference	Policy Language
Developing and Established Urban Areas B. Land Use Section 5.	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.	Policy d. (pg. II-25)	The location, intensity, and design of new development shall respect existing neighborhood values, natural environmental conditions and carrying capacities, scenic resource, and resources of other social, cultural, recreational concern.
		Policy k. (pg. II-28)	Land adjacent to arterial streets shall be planned to minimize harmful effects of traffic; livability and safety of established residential neighborhoods shall be protected in transportation planning and operation.
		Policy o. (pg. II-30)	Redevelopment and rehabilitation of older neighborhoods in the Existing Urban Area shall be continued and strengthened.
Central Urban Area[1] B. Land Use Section 6.	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.	Policy a. (pg. II-33)	New public, cultural, and arts facilities should be located in the Central Urban Area and existing facilities preserved.
		Policy b. (pg. II-33)	Upgrading efforts in neighborhoods within the Central Urban Area should be continued and expanded and linkages between residential areas and cultural/arts/recreation facilities.
Air Quality C. Environmental Protection and Heritage Conservation Section 1.	To improve air quality to safeguard public health and enhance quality of life.	Policy e. (pg. II-47)	Motor vehicle emissions and their adverse effects shall be minimized.
		Policy g. (pg. II-47)	Pollution from particulates shall be minimized
		Policy i. (pg. II-48)	Air quality considerations shall be integrated into zoning and land use decisions to prevent new air quality/land use conflicts.
		Policy k. (pg. II-49)	Citizens shall be protected from toxic air emissions.

[1] The Central Urban Area is included in the Established Urban Area boundaries; therefore, the goals and policies of the Established Urban Area apply.

Water Quality C. Environmental Protection and Heritage Conservation Section 2.	To maintain a dependable, quality supply of water for the urbanized area's water needs.	Policy c. (pg. II-52)	Water quality contamination from solid waste disposal shall be minimized.
Noise C. Environmental Protection and Heritage Conservation Section 4.	To protect the public health and welfare and enhance the quality of life by reducing noise and by preventing new land use/noise conflicts.	Policy a. (pg. II-59)	Noise considerations shall be integrated into the planning process so that future noise/land use conflicts are prevented.
Historic Resources C. Environmental Protection and Heritage Conservation Section 5.	To protect, reuse, or enhance significant historic districts and buildings	Policy b. (pg. II-61)	Research, evaluation and protection of historical and cultural properties in the City and County shall be continued.
Transportation and Transit D. Community Resource Management Section 4.	To develop corridors, both streets and adjacent land uses, that provide a balanced circulation system through efficient placement of employment and services, and encouragement of cycling, walking and use of transit/para-transit as alternatives to automobile travel, while providing sufficient roadway capacity to meet mobility and access needs.	Policy g. (pg. II-86)	Pedestrian opportunities shall be promoted and integrated into development t create safe and pleasant non-motorized travel conditions.
		Policy p. (pg. II-90)	Efficient, safe access and transfer capability shall be provided between all modes of transportation.
		Policy q. (pg. II-91)	Transportation investments should emphasize overall mobility needs and choice among modes in the regional and intra-city movement of people and goals.
Human Services D. Community Resource Management Section 8.	To site human service facilities in locations that provide the greatest possible access to services, consider human rights and human service needs in development and redevelopment throughout the Plan area.	Policy c (pg. II-103)	Development's negative effects upon individuals and neighborhoods shall be minimized.

Health Impact Assessment

HIAs are tools to help policy makers understand the impacts that a policy, plan or project can have on the community's heath prior to making a decision. In 2008, the North American Conference on Health Impact Assessment developed guidelines for HIAs. These guidelines were updated in 2010 (North American HIA Practice Standards Working Group, 2010). As of 2013, over 80 HIAs had been conducted throughout the U.S. to provide decision makers with scientific evidence to better inform their decisions (Environmental Protection Agency, 2013).

Components of an HIA are:

1. *Screening* – determines whether HIA is an appropriate tool to use to evaluate the decision, and whether the HIA will provide useful and timely information to decision-makers.
2. *Scoping* - outlines the goals of the HIA and describes: a) the health impacts to be considered, b) the impacted population or community, c) who will conduct the HIA, and, d) the data collection and assessment methods.
3. *Assessment* - describes the current health conditions of the impacted population, or community, and forecasts impacts to health conditions that may result from deciding to pursue the proposed plan, policy, or project.
4. *Recommendations* - based on assessment findings, suggests actions to avoid adverse health impacts or to improve beneficial health impacts resulting from the pending decision.
5. *Reporting* - documents the HIA process as well as the findings both verbally, for example by meeting with or testifying before decision-makers, and in writing.
6. *Monitoring and Evaluation* - evaluates the following: a) process used to conduct the HIA, b) impact of the HIA on the pending decision and decision-making process, and c) impact of the HIA on the health outcomes that were assessed.

Screening

Screening, step one of the HIA process, considers whether an HIA should be conducted on the pending decision. Factors favorable to conducting an HIA include: a) policy makers that are willing to consider HIA findings as part of their decision-making process, b) the ability to conduct an HIA given the timeline for the pending decision, c) clearly delineated roles and responsibilities for stakeholders, and d) mutual respect for decision-makers, community members, and other stakeholders. The HIA screening process results in a decision on whether to conduct the HIA and a statement regarding how the HIA will add value to the decision-making process, inform the pending decision, and improve future health.

An HIA Committee was formed in October 2014 with an open invitation to community members to attend the bimonthly meetings. The NV HIA Committee examined what a HIA involves and stated they wanted the HIA to be community-driven with community-generated questions and concerns leading the assessment.

The NV HIA Committee also discussed what was known about the proposed Edith Station.

Committee members held multiple discussions among themselves and other stakeholders regarding the HIA. Generally, meeting deliberation consisted of the following topics: a) the timeline for the proposed Edith Station and whether an HIA could be conducted within the required time frame, b) the receptiveness and openness of policy makers to HIA recommendations as part of their decision-making process, and c) the mounting community concerns regarding potential adverse health impacts in the event the proposed Edith Station proceeded.

Ultimately, the NV HIA Committee decided to move forward in conducting the HIA given: a) the robust documentation already available via stakeholders, the Coalition's website, and the COA's website dedicated to the Edith Station, b) the public health, land-use, economic, and policy expertise available via stakeholders and Committee members, c) the significance of the decision to the historical character of the North Valley, and d) the hope that policy makers would ultimately fulfill their role as Environmental Planning Commissioners and City Councilors to protect the health and well-being of the community they serve.

During the first two meetings in October 2014, the NV HIA Committee completed the Screening portion of the HIA. Although the Committee acknowledged that they didn't know whether or not the proposed Edith Station was a "done deal", they decided the HIA was warranted as it could inform decision makers.

In anticipation of a final HIA submittal date of June 30, 2015, the NV HIA Committee met for two hours on the first and third Thursdays of the month, from October 2014 through July 2015.

Scoping

The NV HIA Committee began the Scoping portion of the HIA by brainstorming questions that they had regarding the proposed Edith Station. In November 2014, these questions were compiled on a Scoping Grid with the following categories: traffic, air quality, water quality, cumulative impacts and environmental justice, economic impacts, noise, vectors such as rodents and insects, odors, litter, occupational safety, and hazardous waste (Attachment 1). Additionally, pathways diagrams were developed to link the issue of concern with potential health impacts (Figures 5-11).

During its November and December 2014 meetings, the NV HIA Committee identified data sources and Committee members volunteered to find data for several of the scoping categories. The NV HIA Committee also developed a one-page fact sheet on the proposed Edith Station titled, *Did you Know?*

At the December 18th meeting, the NV HIA Committee discussed the fact that the COA had decided to hold a public meeting regarding the Edith Station on January

20th that would be advertised, organized and facilitated by the COA. The NV Coalition created postcards that were distributed widely to advertise the meeting.

The January 15th NV HIA Committee meeting was dedicated to getting ready for this meeting and conducting sufficient outreach. To get the community organized for this meeting, the Scoping portion of the HIA was temporarily put on hold.

On January 20, 2015, the COA held its first public meeting on the Edith Station. Over 120 people were in attendance at the meeting with many residents and businesses expressing concerns about lack of community input, potential harms with backed up traffic, inadequate management of the current SWD facility, and questions about how the Edith Station would be operated and if it would constitute a dirty materials recovery facility.

On February 19th, the NV Coalition hosted its own community meeting with approximately 130 people in attendance. COA management, and its contractors, comprised a panel to answer questions from the NV Coalition, the NV HIA Committee and the community on the Edith Station.

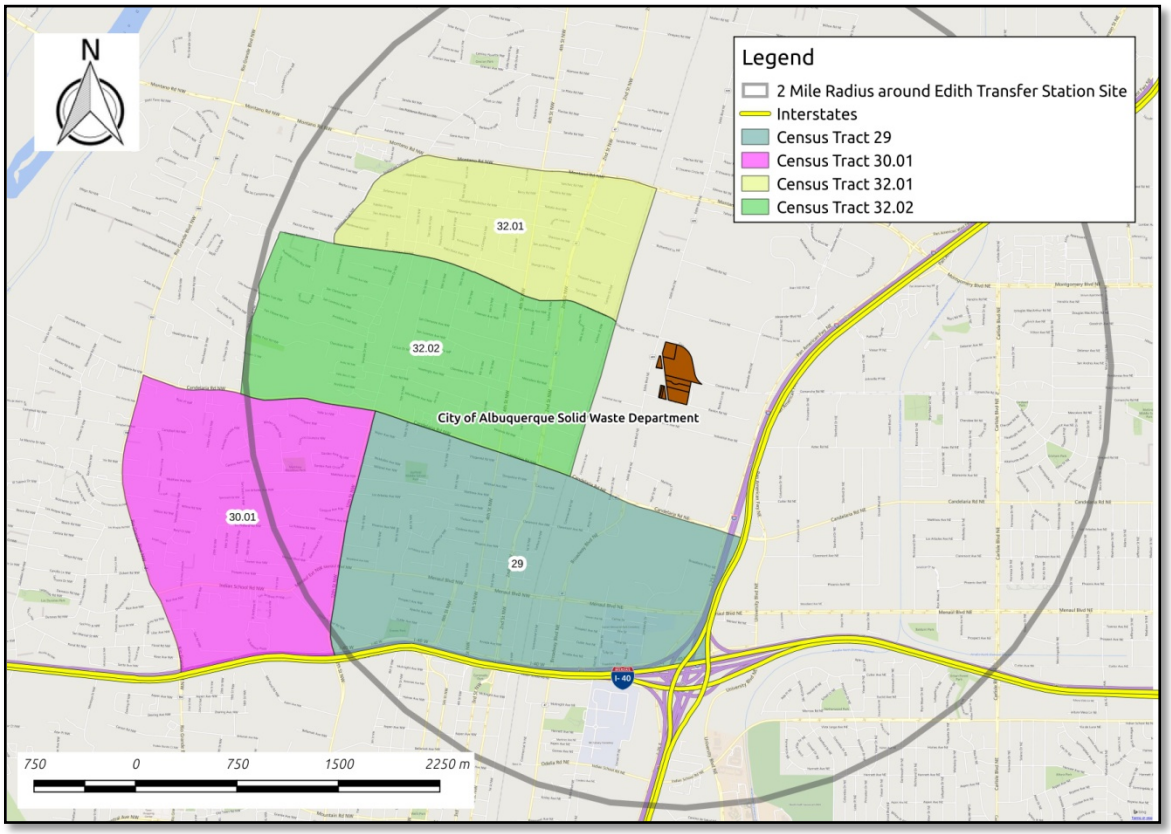
The City held two more public meetings, one on April 21, 2015, and a final public meeting on July 15, 2015. The majority of community residents and business owners/managers attending the City's three public meetings and the NV Coalition's community meeting voiced opposition to the proposed Edith Station.

Information used for this HIA was derived from data provided by the COA and its consultants, and from community members, government documents, health databases, and peer reviewed literature. Government databases that were used include the U.S. Census Bureau's American Fact Finder and the New Mexico Department of Health's (NMDOH), Indicator-Based Information System (IBIS).

For purposes of health outcomes, the "impacted community" was defined as Census Tracts 29, 30.01, 32.01, and 32.02 and NMDOH Small Area 19. The census tract underlying the Edith Station was not used because it extends all the way to Carlisle east of I-25, beyond the area that Committee members felt would be immediately affected. For purposes of industries that are either emitting air pollutants or discharging pollutants into water, the "impacted community" was defined as the as the neighborhoods that are within a radius of 2 miles of the site (Figure 4).

The Assessment Section of the HIA is found on pages 34-96. The Recommendation Section is found on pages 97-101. The Monitoring, Evaluation, and Conclusions Sections are on pages 101-102

Figure 4. Census tracts underlying the impacted community and 2-mile radius of site.



The Pathways Diagrams for each of the issues of concern are provided below.

Figure 5. Traffic Pathway

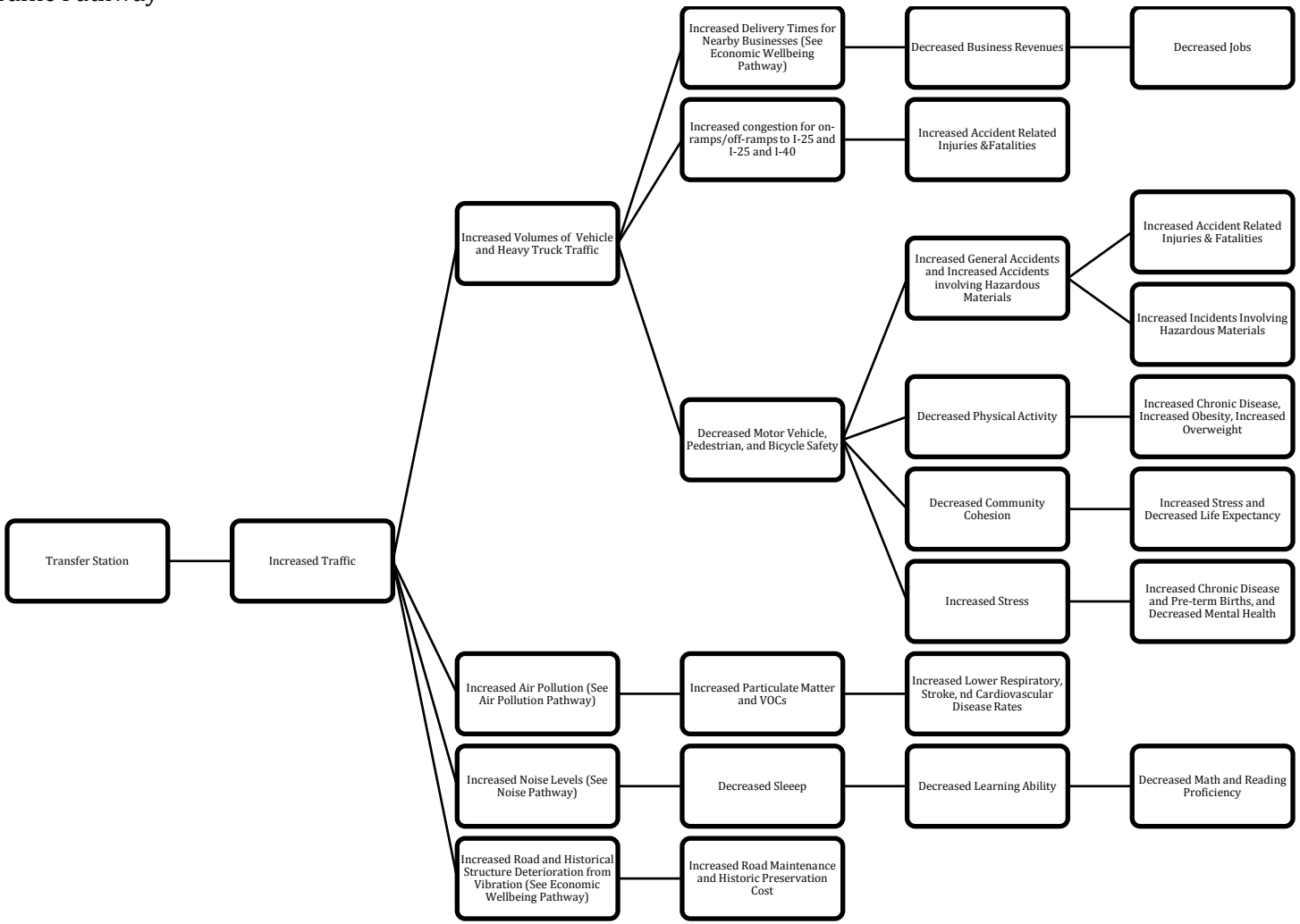


Figure 6. Air Quality Pathway

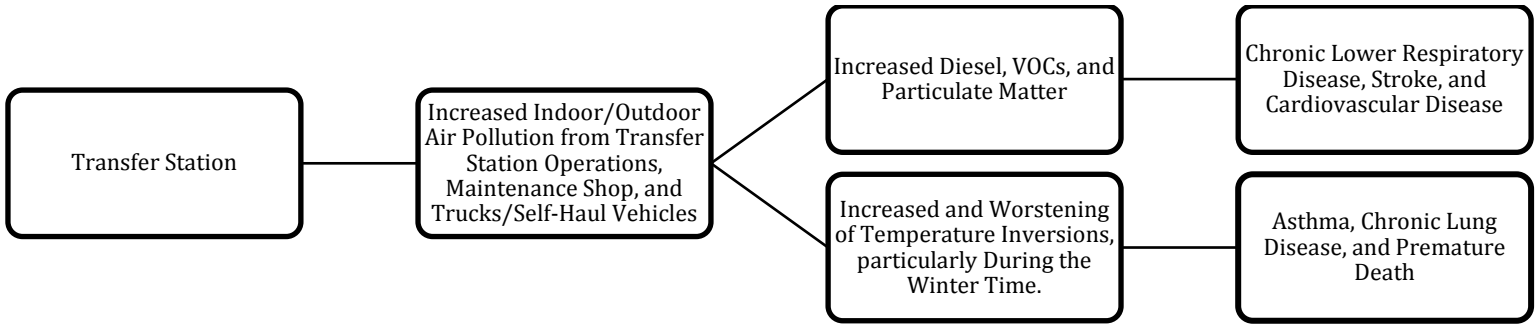


Figure 7. Water Quality Pathway

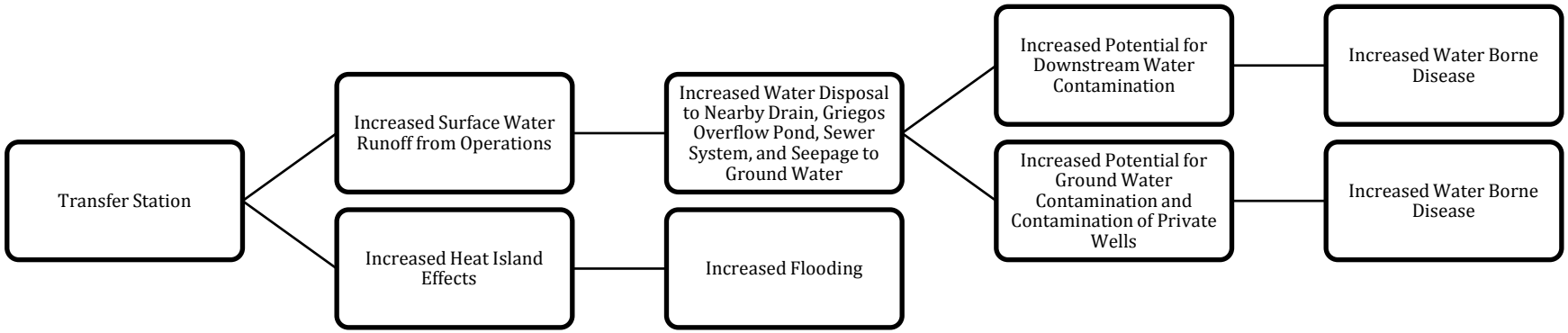


Figure 8. Cumulative Impacts Pathway

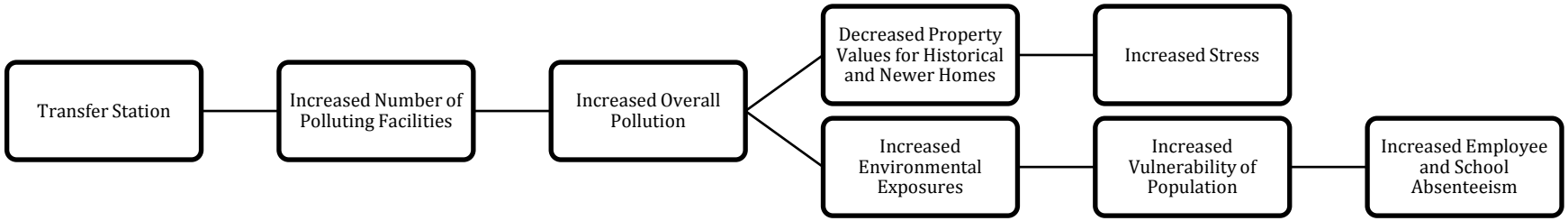


Figure 9. Economic Wellbeing Pathway

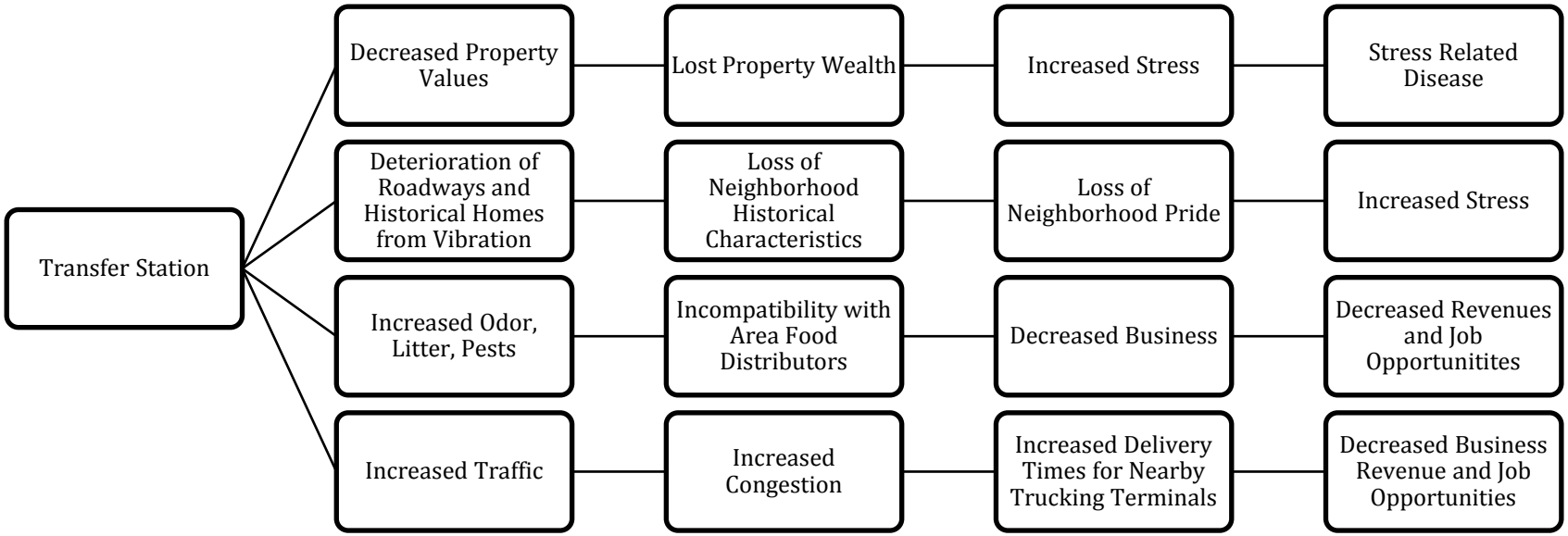


Figure 10. Noise, Vectors, Odors, Litter Pathway

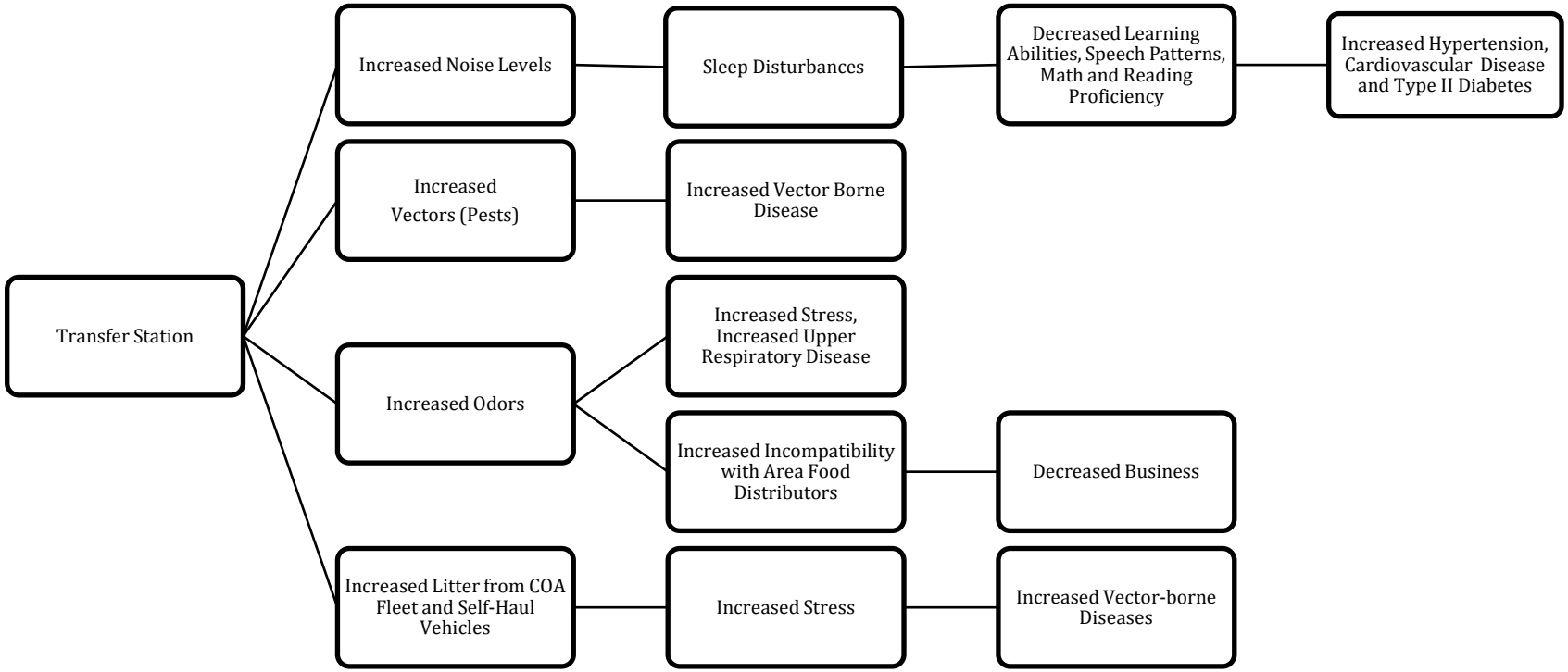
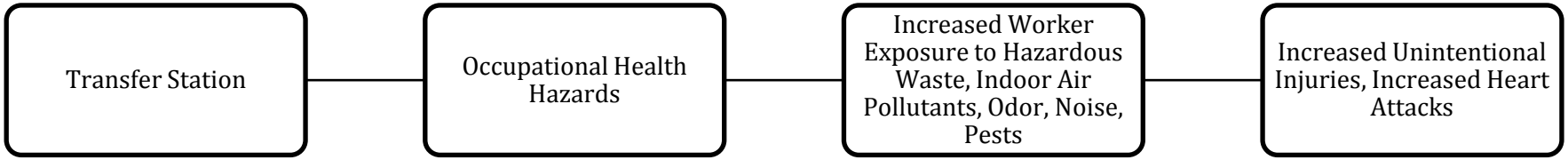


Figure 11. Occupational Safety Pathway



Assessment

Traffic

Vehicle Volume and Traffic Safety

The increase in heavy truck and private vehicle traffic generated by the Edith Station is a top concern of residents living in the impacted community, parents dropping their children off at the nearby community baseball park and schools, area business owners who haul freight into and out of nearby trucking terminals, and the bicycling community.

Residents' and Businesses' Concerns

Both residents and businesses are concerned about the impact of increased heavy truck and private vehicle volumes on:

1. Existing traffic congestion, particularly given the recent increase in heavy truck traffic generated by Friedman Recycling (2012) and increases in vehicle traffic generated by the recent commercial and residential development along nearby 4th Street.
2. Material shipment delays – the impacted community has many businesses and trucking terminals (discussion under *Economic Wellbeing* section).
3. Pedestrian safety – particularly for children attending nearby schools (La Luz Elementary, Menaul School, and Mountain Mahogany) and the baseball park.
4. Bicycle safety for those using the designated Comanche bike facility – one of the few existing "on-street" bicycle facilities that traverses the city from east and west, and Edith Blvd., which is the preferred north-south route that fills the gap between Rio Grande and the North Diversion Channel.
5. Structural integrity of historical and older homes due to road vibrations (discussion under *Economic Wellbeing* Section).
6. Road wear and tear (discussion under *Economic Wellbeing* Section).
7. Backed up traffic at the railroad crossing.
8. Traffic flow onto and off of the Comanche/Griegos I-25 interchange, designated as "severely congested" by the Mid-Region Council of Governments, and the Comanche/Edith intersection.
9. Existing traffic flow at the Big-I, along I-25, and along I-40.
10. Household hazardous waste transport to the Edith Station's hazardous waste drop-off center.
11. Traffic safety issues regarding the steep downhill grade when travelling on Comanche from east of I-25 to west of I-25 toward Edith Blvd.
12. Safe access to public transit stops and public transit commute times.

At the time of writing this HIA, various aspects of the proposed Edith Station were still unclear, such as the number of additional garbage trucks and semi-trucks that will result from the construction and operation of the proposed Edith Station should it proceed, the times of day that the trucks will go through neighborhoods, truck routes, and the number of private vehicles that can be anticipated to access the convenience center. Because of this uncertainty, an independent traffic study was requested to review the COA's Preliminary Traffic Study and to provide independent traffic analysis (Sustainable Systems Research, LLC, 2015).

Vehicle Volume
This section considers the effects of the Edith Station on traffic generation and congestion, and walking and bicycling infrastructure, with a focus on the ease of travel and the availability of safe multi-modal choices.

The Association between Vehicle Volume and Health
Vehicle volumes can have an effect on travel times and road safety. These, in turn, can impact health. Encouraging multi-modal travel through safe transportation infrastructure can improve travel time, opportunities for physical activity, and community cohesion.

Vehicle Volume, Physical Activity, and Chronic Disease
Land use, travel patterns, physical activity, and resultant chronic diseases are closely linked (Frumkin, et. al., 2004; Jackson, et al., 2001). According to bicyclists, multi-modal facilities in the area are already unsafe for travel, and with the addition of increased heavy truck and vehicle traffic, multi-modal facilities will become even more dangerous, resulting in a shift from walking and bicycling to driving. This switch will diminish opportunities for physical activity.

The lack of physical activity is associated with heart disease, hypertension, stroke, diabetes, obesity, osteoporosis, depression and some types of cancer (Policy Link, 2002; Task Force on Community Preventive Services, 2001). Research shows that regular walking and bicycling reduce deaths by 22% and 28%, respectively (World Health Organization, 2011). Additionally, obesity increases by 6% for each additional hour spent in a car per day (Frank, et al., 2004). Alternatively, obesity decreases by 4.8% for each hour walked per day (Frank, et al., 2004). Suggested measures to improve walkability include traffic calming, street connectivity, access to public spaces, well maintained sidewalks, traffic conditions that encourage maximum pedestrian visibility to drivers, safety from crime, and the presence of well-marked bike lanes (Ewing, et al., 2006; Li, et al., 2005; Frank, et al., 2004).

Vehicle Volume, Stress, and Chronic Disease
Among drivers, greater traffic volumes have been associated with higher blood pressure, more self-reported tense and nervous feelings, more self-reported colds and flu, and more days in the hospital (Wener, et al., 2006). Greater traffic volumes also decrease safe multi-modal accessibility for pedestrians and bicyclists, increasing the stress levels for those trying to navigate dangerous roadways to reach their destination.

Many health outcomes are attributed to stress, including increased risk of poorer mental and physical health for children and adolescents, increased risk for pregnant women having pre-term births, and increased likelihood of chronic disease, specifically heart disease and stroke among adults (Egerter, et al., 2011).

Vehicle Volume, Community Cohesion, and Life Expectancy
Community cohesion measures residents' sense of belonging to their neighborhood. Connection with and support from neighbors can prevent feelings of isolation and contribute to self-esteem. Transportation infrastructure can contribute to or detract from interaction among neighbors. For example, the availability of public transit, a component of the transportation system, contributes to less social isolation, decreased stress levels, monetary savings for families from using public transit rather than personal vehicles, and decreased air pollution (Bailey, 2007). For low-income families who do not own a car, public transit is a necessity to access needed services. Greater vehicle volumes detract from the ability to use public transit because of increased danger in accessing public transit stops.

<u>Current Congestion and Health in the Impacted Community</u>
SWD Facility Traffic Volumes
Based on information obtained from John Soladay and Jill Holbert (Attachment 2), at present SWD's heavy truck fleet and employee vehicles make a total 507 round trips into and out of the SWD each weekday and 52 round trips into and out of the SWD each Saturday. Additionally, residential and commercial recycling trucks make a total of 48 round trips into and out of Friedman Recycling, currently located in the impacted community, each day. The SWD heavy truck fleet, comprised of commercial, roll-off, and residential garbage trucks, make a total of 268 round trips to the Cerro Colorado Landfill each weekday and 36 round trips to the Cerro Colorado Landfill each Saturday.

Congestion
The Mid-Region Council of Governments (MRCOG) has designated roadway linkages with the Comanche/Griegos I-25 Interchange as "severely congested". Edith Station generated heavy truck traffic will be using these roadway linkages to access I-25. Table 3 shows congestion measures based on 2012 PM Peak Hour Congestion information provided by J. Luna, Transportation Planner with MRCOG (e-mail communication between J. Luna and K. Richards, February 2015).

Table 3. Measures of congestion within the impacted community.

Measure of Congestion	**Comanche/Griegos I-25 Interchange**	**Montgomery/Montano I-25 Interchange**	**Candelaria I-25 Interchange**
Severely Congested 2 (V/C > 1.5)	Pan American East, South of Comanche	Pan American West, South of Montano	N/A
		Montgomery, West of Pan American East	
Severely Congested 1 (V/C = 1.1 – 1.49)	Comanche, West of Pan American East	Pan American East, South of Montgomery	N/A
		Pan American East, North of Montgomery	
		Montgomery, West of Pan American East	
		Montano, East of Pan American West	

Over Capacity (V/C 1.0 – 1.09	N/A	I-25 Southbound, North of Montano	Pan American East, North of Candelaria
Approaching Capacity (V/C = .9 - .99)	I-25 Northbound, North and South of Comanche Comanche, West of Pan American West	N/A	University, South of Candelaria

Physical Inactivity as a Contributor to being Overweight or Obese
Although there is no physical activity data for the impacted community specifically, data are available for Bernalillo County by non-Hispanic white and Hispanic sub-populations. When asked whether they participated in any physical activities or exercises during the past month, according to 2013 Behavioral Risk Factor Surveillance System (BRFSS) age-adjusted data, 16% of the non-Hispanic white population and 27.5% of the Hispanic population reported that they had not.

When asked how much they weighed and how tall they were without shoes, 52.7% of the non-Hispanic white population and 62.8% of the Hispanic population were considered overweight or obese, defined as having a body mass index of 25-30, and greater than 30, respectively (NMDOH, BRFSS, 2013 data).

Stress as a Contributor to Adolescent and Adult Problems with Mental Health, Pre-term Births, and Chronic Disease
Although there is no mental health data for the impacted community specifically, data are available for Bernalillo County by non-Hispanic white and Hispanic sub-populations. When asked whether their mental health, consisting of stress, depression, and problems with depression was good during the past 30 days, 12.9% of non-Hispanic whites and 14.5% of Hispanics reported 14 or more days during which their mental health was not good (NMDOH, BRFSS, 2013 data).

When students attending Bernalillo County high schools were asked whether they felt so sad or hopeless for almost every day for two weeks or more that they stopped doing the usual activities they had been engaged in for the past 12 months, 29.3% of non-Hispanic white students, and 33.4% of Hispanic students replied, "yes" (NMDOH, Youth Risk and Resiliency Survey, 2011 data).

Again, there is no data for pre-term births for the impacted community; however, data are available at the county level. In 2013, 10.9% of all births to non-Hispanic white women were considered pre-term (less than 37 weeks), compared to 12% of all births to Hispanic women (NMDOH, IBIS, 2013 data).

In addition to the above health outcomes, stress also contributes to chronic diseases such as heart disease and stroke. A discussion of the chronic disease death rates for non-Hispanic whites and Hispanics is under "Death Rates and Life Expectancy" below.

Community Cohesion – Life Expectancy
Community cohesion, a measure of residents' sense of belonging in their community, is frequently a function of the transportation infrastructure. A lack of community cohesion contributes to greater stress levels and shorter life expectancies. Neighborhoods having major thoroughfares running through them or a mix of industrial and residential land uses tend to experience decreased community cohesion (Frumkin, et. al., 2004).

The impacted community covers four census tracts with neighborhoods that vary widely in their characteristics, with some neighborhoods having greater residential property densities and other neighborhoods characterized by a greater mix of industrial and residential land uses. Census tract 29, immediately south of the Edith Station, contains 1,778 residential units; while census tract 32.01 and 32.02, both located directly west of the Edith Station, contain 1,245 and 2,454 residential units, respectively (Census, 2013). The closest residences are .03 miles from the proposed Edith Station site, a group of apartments located at the NE corner of Rankin Rd. and Edith Blvd.

Death Rates and Life Expectancy
Table 4 shows the chronic disease death rates and life expectancy for residents of Bernalillo County and the impacted community. As mentioned previously, increased vehicle volumes have been shown to be associated with increased chronic disease rates and lower life expectancy.

Irrespective of whether one lived in Bernalillo County or the impacted community, the death rates for Hispanics is greater than for non-Hispanic whites. Additionally, the life expectancy for Hispanics is lower than for non-Hispanic whites.

Table 4. Deaths associated with increased congestion for Bernalillo County and the impacted community.

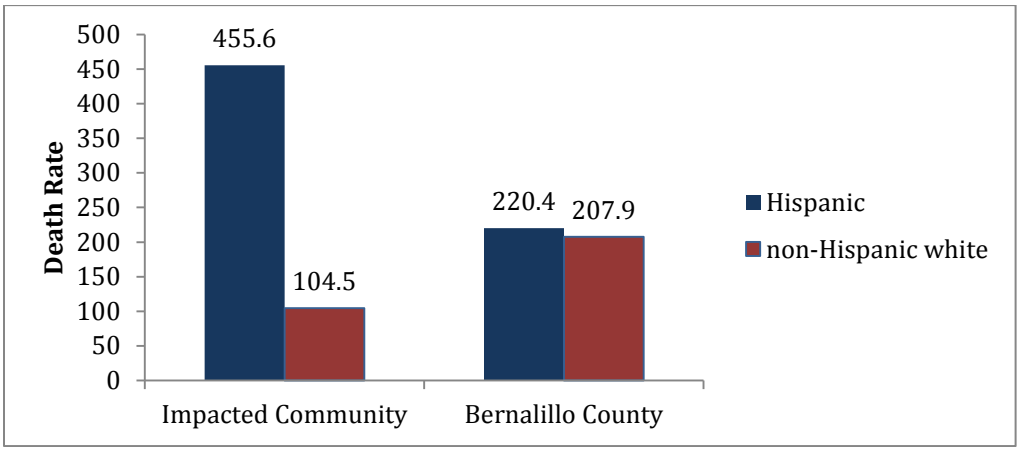
Place	Chronic Disease[2] Death Rate (Ave. Annual Age-adjusted Death Rate per 100,000 persons, 2008-2011)		Life Expectancy from Birth (2011)	
	Non-Hispanic White	Hispanic	Non-Hispanic White	Hispanic
Impacted Community	104.5	455.6	89.6	73.7
Bernalillo County	207.9	220.4	80.1	78.6

Chronic Disease Deaths
When compared to non-Hispanic whites, chronic disease death rates among

[2] For purposes of this report section, chronic diseases consist of those associated with lack of physical activity or increased stress and include: diabetes mellitus, hypertensive heart disease, ischemic heart disease, other diseases of the heart, and cerebrovascular disease (stroke).

Hispanics are greater in Bernalillo County and much greater in the impacted community, 220.4 and 455.6 deaths per 100,000, respectively. Within the impacted community, the difference between deaths attributed to chronic disease among non-Hispanic whites and Hispanics is extremely significant, 104.5 and 455.6 deaths per 100,000, respectively (Figure 12).

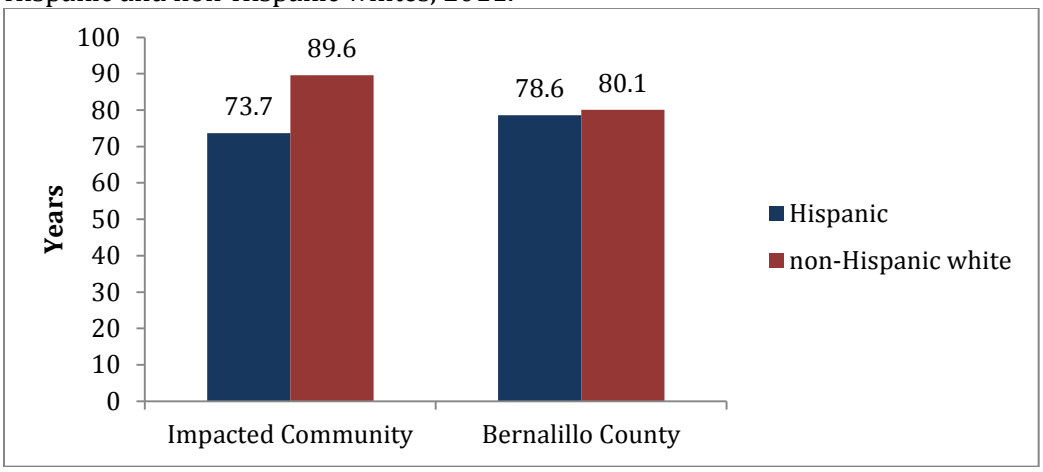
Figure 12. Ave. annual age-adjusted chronic disease death rate per 100,000 persons, the impacted community and Bernalillo County for Hispanic and for non-Hispanic white, 2008-2011.



Life Expectancy

Life expectancy is lower among Hispanics in the impacted community when compared with Hispanics in Bernalillo County, 73.7 years and 78.6 years, respectively. Significantly, there is a 16-year difference in the average life expectancy of Hispanics (73.7) and non-Hispanic whites (89.6 years) in the impacted community (Figure 13).

Figure 13. Life Expectancy from birth, the impacted community and Bernalillo County for Hispanic and non-Hispanic whites, 2011.



Predicted Congestion and Health in the Impacted Community

Edith Station Traffic Volumes

If the Edith Station proceeds, trips made by garbage trucks to the Cerro Colorado Landfill each weekday will instead travel to the Edith Station to drop off their waste loads. In addition, semi-trucks will make an estimated 65 round trips to the Cerro Colorado Landfill each weekday. Combined, these heavy trucks will make a minimum of 229 additional round trips into and out of the Edith Station each weekday[3], a 173% increase from current round trips (132) made by SWD's heavy truck fleet. Heavy trucks will make a total of 361 round trips into and out of the Edith Station each weekday (Table 5). 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 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.

Table 5. Current traffic into and out of the SWD and Friedman Recycling, and predicted traffic into and out of Edith Station, respectively.

Type of vehicle	Current # of round trips into and out of the SWD facility each weekday	Current # of round trips into and out of the SWD facility each Saturday	Current # of round trips into and out of Friedman Recycling each day	Predicted # of round trips into and out of the Edith Station each weekday	Predicted # of round trips into and out of the Edith Station each Saturday
Collection and support heavy truck fleet[4]	132	18	48	296	42
Semi-truck fleet	0	0	0	65	8
Collection support pickup trucks	28	4		28	4
Private self-haul vehicles	0	0	0	225	300
Total vehicles, not including private employee/administrative vehicles	160	22	48	614	354

Edith Station Congestion

With the addition of 229 round trips made by garbage trucks and semi-trucks into and out of the Edith Station, traffic congestion will increase, particularly for the "severely congested" Comanche/Griegos I-25 and Montgomery/Montano I-25 interchanges. Congestion on arterial streets will increase as well. Arterial streets

[3] Calculations estimate the number of new trips to the Edith Station when trips to the landfill made by the current SWD collection fleet are transferred there (2-5 round trips/day, varying by service). SSR estimate is 232-254 new truck trips because their estimate shifts the City's assumptions as described in their report.

[4] This includes heavy trucks used for trash and recycling collection and for collection and fleet support.

that will be impacted include Edith Blvd., Comanche, and Rankin Rd., depending on the selected Edith Station ingress and egress points, as well as other arterial roads in the area.

Physical Activity
There are no planned improvements to the Comanche/Griegos I-25 intersection or to arterial streets should the Edith Station proceed. Absent any transportation infrastructure improvements, barriers to safety will increase because of greater heavy truck and vehicle traffic volumes. Research shows that higher traffic volumes negatively impact perceptions of safety and the attractiveness of walking and bicycling decreasing opportunities for physical activity. Bicyclists in the area have already stated that heavy truck traffic, poor physical road conditions, and a lack of safety are the main barriers to using the Comanche bicycle facility. With additional heavy truck and vehicle traffic, these barriers to using the Comanche bicycle facility will increase. Additionally, area bicyclists also feel that added heavy truck and vehicle traffic will negatively impact the multi-modal use of Edith Blvd., which is a convenient multi-modal route because it runs north and south through the metropolitan area.

Stress
Traffic volume impacts to multi-modal accessibility and opportunities for physical activity, and community cohesion can increase stress levels. Stress can lead to more pre-term births, poorer mental health for children and adolescents, and increased cardiovascular disease in adults. Increased heavy truck and vehicle traffic volumes will increase stress because of diminished safety while navigating roadways and increased congestion on arterial roadways near the Edith Station (Babisch, et al., 2001).

Community Cohesion
Community cohesion helps alleviate stress and is connected to longer life expectancies. Increased heavy truck and vehicle traffic will decrease neighborhood connectivity, the ease of multi-modal travel, safe access to public transit stops, and community cohesion; therefore, the health benefits of community cohesion may not be realized (Frumkin, et al., 2004).

Health Outcomes For Hispanic, Low-Income, and Children of the Impacted Community
Low-income residents of the impacted community will be disproportionately impacted by the traffic generated from the Edith Station because they are less likely to drive and more likely to walk or use public transit given the costs of car ownership. Walking and bicycling on dangerous roadways will increased stress levels. Five hundred and thirty-three households in the impacted community do not have a car, and as a result are either required to walk, bicycle, or use public transit to access their destinations (Census, 2013). Additionally, given the greater percentages of low-income residents living closer to freeways, these residents will also experience an increased burden from the added heavy truck traffic travelling on I-25 and I-40 to access the Cerro Colorado Landfill.

The health outcome data provided in this section shows that the impacted community's Hispanic population bears a disproportionately greater burden of many of the negative health outcomes associated with greater traffic volumes and congestion, including a lack of physical activity, overweight and obesity, adult and adolescent mental health problems, pre-term births, heart disease, and stroke. With the addition of more heavy truck and vehicle volumes and the absence of necessary transportation infrastructure improvements, the disproportionate health burden among Hispanics living in the impacted community will continue.

Children who attend nearby La Luz Elementary and the baseball field that is located on Edith across the street from the proposed Edith Station are also likely to be disproportionately impacted. Children perceive the built environmental differently than adults, and as a result are more likely to become victims of the increases in heavy truck and vehicle traffic while crossing a busy street to access a school, playing outside, or visiting a nearby friend.

Table 6 shows how increased heavy truck and vehicle volumes generated by the Edith Station will diminish the impacted community's health.

Table 6. Summary of congestion-related health impacts

Indicator	Health Impact	Magnitude	Severity	Strength of Evidence
Lack of Physical Activity	(-)	Major	High	***
Overweight or Obese	(-)	Major	High	***
Mental Health (adolescents and adults)	(-)	Major	High	***
Percentage Pre-term Births	(-)	Major	High	**
Chronic Disease consisting of: diabetes mellitus, hypertensive heart disease, ischemic heart disease, other diseases of the heart, and cerebrovascular disease (stroke)	(-)	Major	High	***
Life Expectancy from Birth	(-)	Major	High	**

Explanations (Table adapted from Human Impact Partners, 2011):
Impact refers to whether the Edith Station will improve (+), harm (-), or not impact health effects (~).
Magnitude reflects a qualitative judgment of the size of the anticipated change in health effects (e.g., the increase in the number of cases of disease, injury, adverse events): Negligible, Minor, Moderate, Major.
Severity reflects the nature of the effect and its permanence: High = severe, Mod. = moderate, Low = not severe.
Strength of causal evidence refers to the strength of the research showing causal relationship between congestion and the health outcome: * = plausible but insufficient evidence, ** = likely but more evidence is needed, *** = high degree of confidence in causal relationship. A causal effect means the effect is likely to occur, irrespective of the magnitude and severity.

Traffic Safety

This section describes: 1) the link between traffic safety, collisions and health, 2) current traffic safety conditions near the existing SWD facility, and 3) the impact of traffic generated from the Edith Station on traffic safety.

The Association between Traffic Safety and Health

Motor vehicle traffic collisions are a leading cause of injuries and death in the U.S. and the number one cause of death for those aged 5 to 34 years (Centers for Disease Control and Prevention, 2011). Motor vehicle collisions are the 3rd most common cause of death, behind cancer and heart disease. In 2011, New Mexico ranked the 10th highest in the U.S. for motor vehicle related deaths – a fatality rate of 16.95 per 100,000 persons, compared with the national fatality rate of 10.4 per 100,000 persons (MRCOG, 2011).

Pedestrians and bicyclists are disproportionately injured and killed in traffic collisions. Nationally, about 14% of motor vehicle collisions involved pedestrians, bicyclists, and motorcycles (MRCOG, 2011).

Factors Affecting Outcome Severity for Collisions

Collision and injury severity increase exponentially with the impact speed of the vehicle and in proportion to the mass of the vehicle (Rettig, et al., 2008; Evans and Frick, 1992). The chance of a motor vehicle related injury being fatal increases by 370% when the vehicle involved is a heavy truck (Kim, et al., 2010).

Truck-Related Collisions

A greater volume of heavy trucks compounds existing safety problems associated with congestion. Heavy trucks are dangerous not only to other motor vehicles, but to bicyclists and pedestrians as well because of their exaggerated lateral movements while travelling down a street and their tendency to off track while turning right (Kim, et al., 2010). Further, compared to other vehicles, heavy trucks have longer stopping distances and far more blind spots. Eighty-four percent of fatalities in heavy truck collisions are passengers in other vehicles (MIG and ICF International, 2009). Freeway ramps are challenging to truck drivers because of the trucks' increased length, weight and higher weight distribution. Traffic collisions involving trucks have been shown to decrease when trucks travel in designated truck lanes (Rakha, et al., 2005).

Vehicle-Pedestrian Collisions

In 2011, New Mexico ranked the 5th highest in the U.S. for pedestrian fatalities. Collisions involving pedestrians were the highest around noon through early evenings on the weekdays and early evenings to late nights on the weekends. Collisions involving pedestrians were the highest in the winter months (MRCOG, 2011). It is well documented that higher traffic volumes contribute to more traffic-related pedestrian injuries (Levine, et al., 1995; Jackson, et al., 2001; LaScala, et al., 2000).

The lack of traffic safety disproportionately affects low-income neighborhoods. Research shows that pedestrian collisions occur more frequently in areas characterized as industrialized and having low-income and minority populations (Roberts, et al., 1995; Cottrill, et al., 2010). Using data from four California communities, researchers found that pedestrian injuries were greater in areas characterized by higher unemployment, lower median household incomes, younger populations, and greater traffic flow (LaScala, et al., 2004). A King County, Washington study found that pedestrian injuries and fatalities were greater in communities having lower median home values, regardless of the level of pedestrian activity or population density (Moudon, et al., 2011).

Vehicle-Bicycle Collisions

In 2012, New Mexico ranked the 3rd highest in the U.S. for per capita bicyclist fatalities (NHTSA Fatality Analysis Reporting System), up from a ranking of the 18th highest in the nation in 2011. Collisions involving bicycles were the highest in mid to late afternoons on weekdays and mid to late evenings on weekends (MRCOG, 2011).

Bicyclists face a much greater risk than other vehicles because of their proximity to vehicles and absence of protection. Improvements used to decrease vehicle-bicycle collisions, include dedicated bike lanes and protected and buffered bike lanes (Reynolds, et al., 2009). Risk of serious injury for a bicyclist, reported as an odds ratio (OR) here, follows (note that higher odds ratios indicate a stronger association): collision with a motor vehicle (OR=4.6), self reported speed >15 mph (OR=1.2), and age, less than 6 years old or greater than 39 years old, OR = 2.1 and 2.2, respectively (Rivera, et al., 1997).

Hazardous Waste Transport

Nationally, over half of the incidents involving the release of hazardous waste occur during transport, loading, or unloading (Binder, 1989). Nine percent of hazardous waste incidents involved collisions, derailments, and vehicle overturns (Binder, 1989). The injury severity from exposure to hazardous waste is dependent on several factors, including the material's toxicity, one's proximity to the incident, and the timeliness of effective treatment.

<u>Current Traffic Safety and Health in the Impacted Community</u>

Collision Rates

As shown in Table 7, some intersections within the impacted community experience up to 3 times above the average collision rates when compared to other areas in the Albuquerque metropolitan region. Extremely high collision areas resulting in death and injury occur at the following intersections: 1) 4th Street and Griegos, 2) Edith and Comanche, and 3) I-25 and Comanche. Areas having an extremely high number of collisions involving pedestrians occur at 4th Street and Montano. Areas having an extremely high number of collisions involving bicyclists occur at: 1) 4th Street and Montano, and 2) 2nd Street and Montano. Data provided in Table 7 is from the MRCOG's General Crash Data and Trends for 2002-2011 (MRCOG, 2011).

Table 7. Collision rates by category occurring at intersections within the impacted community.

Collision Rates	**Overall Collision Rates**	**Fatal and Injury Collision Rates**	**Pedestrian Collision Rates**	**Bicycle Collision Rates**
Up to 3 times above the average collision rate	4th Street and Griegos intersection	4th Street and Griegos intersection	N/A	N/A
Up to 2 times above the average collision rates	Edith and Comanche intersection	Edith and Comanche intersection	4th Street and Montano	4th Street and Montano
	I-25 and Comanche intersection	I-25 and Comanche intersection		2nd Street and Montano

Motor Vehicle Related Deaths

Table 8 shows motor vehicle related death rates. Irrespective of whether one lived in the impacted community or Bernalillo County, the death rate for Hispanics is greater than for non-Hispanic whites, 11.4 deaths per 100,000 persons and 12 deaths per 100,000 persons, respectively.

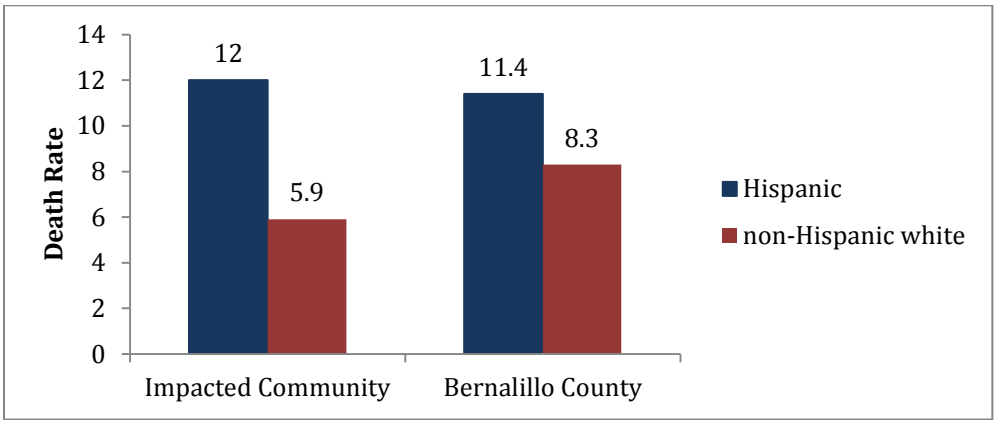
Table 8. Motor vehicle related death rates for Bernalillo County and the impacted community.

Place	Motor Vehicle Related Death Rate (Ave. Annual Age-adjusted Death Rate per 100,000 persons, 2008-2011)	
	non-Hispanic white	Hispanic
Impacted Community	5.9	12.0
Bernalillo County	8.3	11.4

When comparing the death rates for Hispanics and non-Hispanic whites in the impacted community, Hispanics experienced a far greater death burden, 12 deaths per 100,000 persons compared to 5.9 deaths per 100,000 persons for non-Hispanic whites[5] (Figure 14).

[5] Due to the small number of health events and/or population numbers, motor vehicle death rate statistics are very unstable for Hispanic and non-Hispanic whites for the impacted community. However, data from NMDOH IBIS is considered the most reliable for sub-county analysis of health.

Figure 14. Ave. annual age-adjusted motor vehicle related death rate per 100,000 persons, the impacted community and Bernalillo County for Hispanic and non-Hispanic white, 2008-2011.



Hazardous Waste Transport

In addition to the acceptance of hazardous waste at the nearby Rinchem facility, the Edith Station will also accept household hazardous waste. With two facilities accepting hazardous waste in their community, residents bear a disproportionate risk of being exposed to hazardous waste through unintended releases because of vehicle collisions, loading, or unloading. The presence of two facilities that accept hazardous waste in their neighborhood creates an environmental injustice and follows a national historical trend of locating hazardous waste sites in low-income and minority communities.

<u>Predicted Traffic Safety and Health in the Impacted Community</u>

Changes to Collisions on the Comanche/Griegos I-25 On-/Off-Ramps

Truck-Related Collisions

Truck collisions are highly dependent on truck volumes. Heavy truck volumes are anticipated to increase in the impacted community with the development of the Edith Station given the proposed truck routes into and out of the Edith Station (figure 15).

Figure 15. Map of proposed Edith Station Transportation Route

Research shows that many truck collisions occur on freeway ramps as trucks are merging into oncoming traffic. This research is particularly important given the already high number of collisions resulting in injuries and fatalities and the designation of the Comanche/Griegos I-25 interchange as "severely congested". Without freeway on-/off-ramp design improvements and mediating factors to alleviate already severe congestion, this interchange is predicted to have higher rates and higher severity of truck-related collisions.

As mentioned by one business owner and member of the NV HIA Committee, "the exposure of employees working in surrounding businesses and SWD employees to increased traffic and related injuries/fatalities is an OSHA concern and an insurance concern because of worker's compensation issues. My trucks have been involved in four accidents within the past year at the Comanche/Griegos I-25 Interchange. I tell my employees to avoid this interchange at all costs" (HIA Committee Meeting, 6/2015).

An increase in truck traffic will also contribute to deteriorated on-/off-ramp and interstate pavement conditions due to the immense weight of trucks when compared to other vehicles. Deteriorated road conditions can contribute to increased collision rates for all vehicles, "particularly on freeways where higher speeds occur" (Human Impact Partners, 2011).

Vehicle-Pedestrian/Bicycle Collisions
Pedestrian and bicycle collisions at intersections which contain on-/off-ramps are very dependent on the design of ramps. If the design of current on-/off-ramps accessing I-25 remains unchanged, vehicle-pedestrian/bicycle collisions will increase given the additional heavy truck and vehicle traffic generated by the Edith Station.

Changes to Collisions on Arterial Roads
Vehicle, pedestrian, and bicycle collisions off the freeway are also likely to change as a result of the Edith Station, resulting in more motor vehicle related injuries and deaths.

Vehicle-Vehicle Collisions
Vehicle volumes can be expected to increase due to the presence of a convenience center at the Edith Station. Although the COA has not provided exact numbers for vehicle round trips associated with the convenience center, they have stated they expect approximately 225 additional self-haul vehicle round trips on the weekdays and 300 additional self-haul vehicle round trips on Saturday and Sunday. As a result of increased vehicular traffic on arterial roads, it is expected that increased collisions will occur, particularly if arterial road improvements are not made.

Of particular importance is the impact of additional traffic volumes to the 4th Street and Griegos intersection, which currently experiences up to 3 times above the average injury and fatality collision rate. Due to the North 4th Street Corridor

Development Project, area traffic has increased. Should the Edith Station proceed, there will be even more traffic contributing to greater traffic volumes, greater congestion, and more collisions. Also important is the Edith and Comanche intersection, which experiences up to 2 times above the average injury and fatality collision rate when compared to the Albuquerque metropolitan region.

Truck-Vehicle Collisions
Truck collision rates are highly dependent by truck volumes. On arterials, truck volumes are expected to increase. If developed, the Edith Station will generate a 173% increase in SWD truck fleet traffic when compared to existing SWD truck fleet traffic. Since there are no anticipated roadway or intersection improvements, increased truck volumes will lead to increased truck-related collisions, which tend to be disproportionately severe due to the sheer mass of trucks.

Additionally, absent any road improvements, many garbage trucks will be turning left, across traffic headed east on Comanche, to access the Edith Station. Turning left, across oncoming traffic, is likely to increase truck-related collisions at the already dangerous Edith and Comanche intersection.

Vehicle-Pedestrian/Bicycle Collisions
Changes in vehicle-pedestrian/bicycle collisions are a function of the volumes of vehicles, pedestrians, and bicyclists on roadways. Recall that Comanche is a COA designated bike facility and that Edith is a heavily used south-north designated bike route. The Comanche bike facility is one of only a few that traverses the city east and west. 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 will result in an increased frequency of vehicle-pedestrian/bicycle collisions, which will be disproportionately severe when the vehicle involved is a truck. At present, there are four ghost bikes, each representing the death of a bicyclist, on Comanche.

Other key intersections likely to be impacted are 4th Street and Montano and 2nd Street and Montano, which currently experience up to 2 times above the average collision rates involving bicyclists, and 4nd Street and Montano, which currently experiences up to 2 times above the average collision rates involving pedestrians. Because of their close proximity to the Edith Station site, Edith and Comanche and 2nd Street and Griegos intersections will also be affected.

Motor Vehicle Related Deaths for Hispanic, Low-Income, and Children of the Impacted Community
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 in poverty, and minority (64.6%). As previously mentioned, the lack of traffic safety disproportionately affects low-income and minority neighborhoods (Roberts, et al., 1995; Cottrill, et al., 2010). When compared with non-Hispanic whites, the Hispanic

population in and outside of the impacted community experiences more motor vehicle related deaths. When compared with non-Hispanic whites from the impacted community, Hispanics from the impacted community bear an even greater health burden attributed to motor vehicle related deaths, 12 deaths per 100,000 persons compared to 5.9 deaths per 100,000 persons. Based on the current trend, Hispanics are disproportionately affected by motor vehicle related deaths. It is expected this trend will continue and that Hispanics will be disproportionately affected by motor vehicle related deaths attributed to the heavy truck and vehicle traffic generated by the Edith Station.

Low-income populations that cannot afford a car and instead walk or bicycle to their destination and children who perceive the built environment differently than adults will also be disproportionately affected by increased collisions and increased collision severity due to increased heavy truck and vehicle volumes associated with the Edith Station. As mentioned previously, collision severity increases when the collision involves a pedestrian or a bicyclist, or involves a heavy truck.

Hazardous Waste Transport

The potential for residents of the impacted community to become exposed to hazardous waste will increase because: 1) the Edith Station will accept household hazardous waste, and as a result more vehicles will be transporting hazardous waste, and 2) the Edith Station will generate more heavy truck and vehicle traffic increasing the potential for collisions with vehicles transporting hazardous waste.

Table 9 provides a summary of injuries and fatalities caused by collisions that would result from the additional traffic generated by the Edith Station, along with information on the magnitude and severity of collisions.

Table 9. Summary of injuries and fatalities caused by an increase in traffic collisions

Indicator	Health Impact	Magnitude	Severity	Strength of Evidence
Vehicle-Vehicle injuries/fatalities	(-)	Major	High	***
Truck-Vehicle injuries/fatalities	(-)	Major	High	***
Vehicle-Pedestrian/Bicyclist injuries/fatalities	(-)	Major	High	***
Incidents Involving Hazardous Wastes	(-)	Moderate	High	***

Explanations (Table adapted from Human Impact Partners, 2011):
Impact refers to whether the Edith Station will improve (+), harm (-), or not impact health effects (~).
Magnitude reflects a qualitative judgment of the size of the anticipated change in health effects (e.g., the increase in the number of cases of disease, injury, adverse events): Negligible, Minor, Moderate, Major.
Severity reflects the nature of the effect and its permanence: High = severe, Mod. = moderate, Low = not severe.
Strength of causal evidence refers to the strength of the research showing causal relationship between vehicle collisions and the health outcome: * = plausible but insufficient evidence, ** = likely but more evidence is needed, *** = high degree of confidence in causal relationship. A causal effect means the effect is likely to occur, irrespective of the magnitude and severity.

Air Quality

In March 2014, the World Health Organization (World Health Organization, 2014a) reported that air pollution is the single biggest threat to health. Shortly thereafter, the American Lung Association released its annual report indicating that more than 147.6 million people, 47% of the nation, live where pollution levels are too dangerous to breathe (American Lung Association, 2014b). Individuals living in cities are exposed to a variety of air pollutants that can affect health. Air pollution has numerous sources, but is primarily a consequence of inefficient combustion of fuels used for transport, power generation, and other human activities (World Health Organization, 2014b). Many emissions are produced by the combustion of fossil fuels. Those that are considered primary air pollutants and are directly emitted into the air include fine particulate matter ($PM_{2.5}$, PM_{10}), sulfur dioxide (SO_2), nitrogen oxides (NO and NO_2), carbon monoxide (CO), and volatile organic compounds (VOCs). The introduction of a WTS will significantly increase the amount of air pollution in the impacted community.

Residents' and Businesses' Concerns

1. Residents feel that they are already exposed to high levels of air pollution because of their location in the North Valley, an area with a high concentration of industries that release air pollutants.
2. Residents are concerned about the respiratory health of children who attend public schools, baseball parks, and day care centers within a short distance of the proposed Edith Station.
3. Residents are concerned about the location of their neighborhood within the context of winter air inversions, and the concentration of air pollutants in the bottom of the Rio Grande Valley.
4. Residents are worried about diesel emissions from the increased number of garbage trucks entering the neighborhood and idling trucks, the additional air pollution produced by the maintenance shop and Edith Station operations, and the cumulative increase in air pollution generated by the Edith Station and existing industries in their community.
5. Businesses are concerned about their employees' health.

<u>The Association between Air Quality and Health</u>

The presence of particulate matter in the atmosphere, referred to as PM_{10} and $PM_{2.5}$, constitutes a major health risk. Because particulate matter is inhaled deep into the lungs, it causes damage to lung tissue, resulting in respiratory and pulmonary diseases, as well as cardiovascular risks (Cordero, et. al., 2013). Each 10 $\mu g/m^3$ jump in concentration of $PM_{2.5}$ is tied to an 8% increase in lung cancer mortality, a 6% increase in cardiopulmonary mortality, and a 4% increase in mortality from general causes (New Mexico Indicator-Based Information System, 2015a). Similarly, an increase of 20 $\mu g/m^3$ causes an increase in hospital or emergency room visits of 4% - 8%. For childhood asthma, a 20$\mu g/m^3$ increase in PM_{10} has been associated with a 3.2% increase in emergency room visits (Trenga, et al., 2006).

The effects of ozone on health are no less pernicious. Because ozone has limited solubility in water, the upper respiratory tract is not as effective at removing this molecule from inhaled air. Instead, it reaches the lower respiratory tract where it dissolves in the epithelial lining fluid. Here it reacts rapidly with sensitive tissues to impede or obstruct full lung capacity. Symptoms include persistent cough, throat irritation, pain or burning in the chest, and wheezing or shortness of breath. Observational studies indicate that long-term effects due to high concentrations of ozone may lead to outcomes that include an increase in the number and severity of asthma attacks, an increase in hospital admissions, and an increase in daily deaths.

Exposure to air pollution in metropolitan areas also carries an increased risk of developing various types of cancers, especially among racial and ethnic minorities living in segregated neighborhoods (Morello-Frosch, et al., 2006). At a national level, this pattern was especially marked for Hispanics.

Finally, seasonal changes in weather and temperature have the potential to create inversions where colder air is found near the surface, atmospheric convection and mixing is impeded, and ground level air becomes stiller from the concentration of dust and pollutants that are no longer able to escape higher into the atmosphere (Wikipedia, 2015). In the Albuquerque area, while temperature inversions are most common in the winter, they may occur at any time of the year when warmer air 'caps' colder air below. Epidemiological research indicates that winter inversions are positively associated with increased rates of emergency department visits for asthma over and above baseline rates (Beard, et al., 2012).

Effects of Air Pollution on Children

Abundant research demonstrates the dangers of air pollution for children. Evidence from epidemiological data and toxicological studies have shown the higher susceptibility of children to respiratory damage from exposure to particulate matter. Among children, increases in the concentration of $PM_{2.5}$ are linked to decreases in breathing function, peak expiratory flow, maximal mid-expiratory flow, exacerbation of allergic disease and asthma, and increases in pulmonary injury and inflammation (Peel, et al., 2005). Because children breathe more closely to the ground (where particles are concentrated), and have a higher ventilation rate, children typically inhale more pollutants than adults per unit of body weight. Hospital or emergency room visits for asthma and respiratory infection in children can climb with even short-term increases in $PM_{2.5}$ (EPA, 2004). Finally, because children's lungs continue to grow for up to 10 years post-birth, the effects of air pollutants have permanent, irreversible consequences that will persist throughout adulthood.

<u>Current Air Quality and Health in the Impacted Community</u>

The EPA maintains a network of air quality monitoring stations across the U.S. that record the concentration of the six major air pollutants. In Albuquerque, there are a number of air monitoring stations that collect air quality data. Based on data collected from the EPA, Bernalillo County currently meets attainment of all National

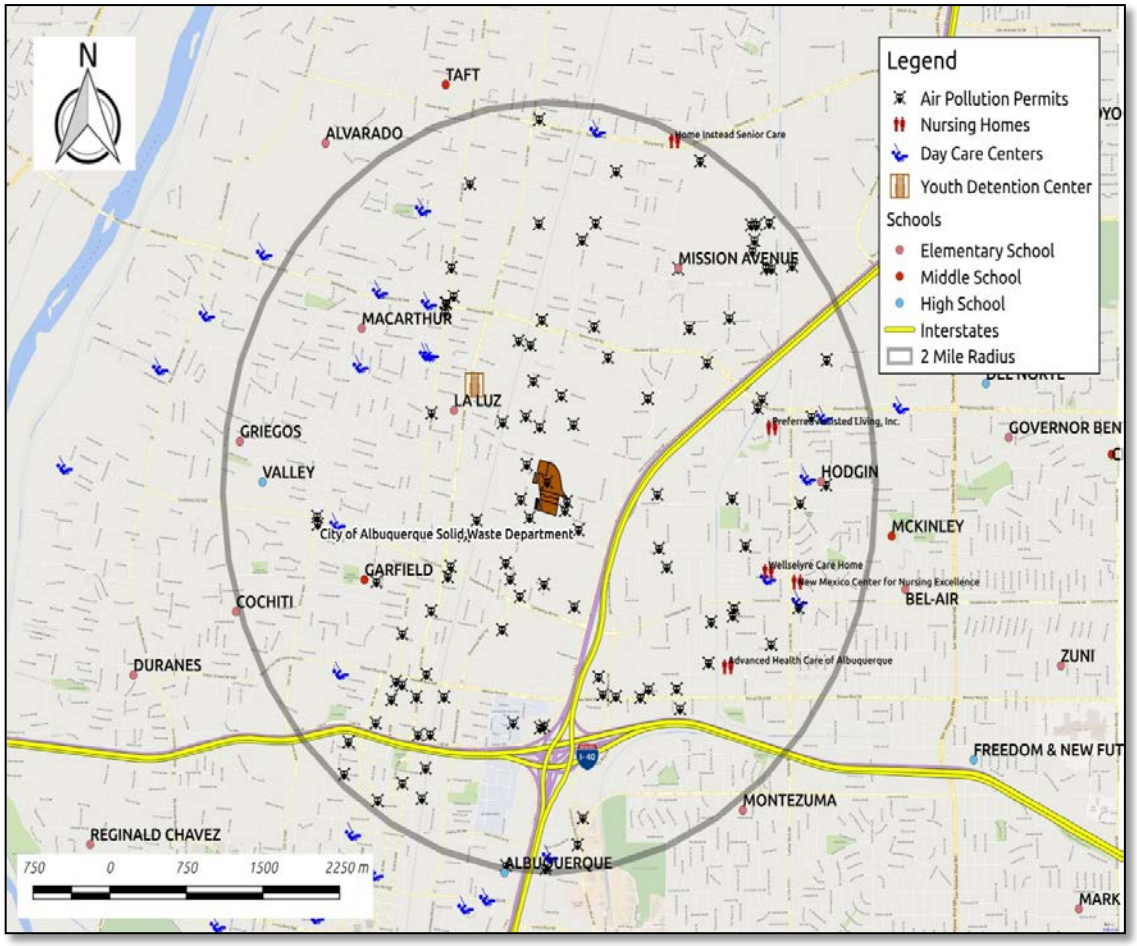
Ambient Air Quality Standards (NAAQS). However, inspection of specific station data indicates that air contaminant concentrations have come close to exceeding the PM_{10} standard on several occasions in the past few years. The air quality monitoring station located the closest to the impacted community is identified as No. 35-001-0026/Jefferson Station, and is sited at 3700 Singer Blvd., NE, approximately 1.9 miles from the proposed Edith Station site. Table 10 shows the three highest values measured for PM_{10} at this air monitoring station.

Table 10. Measured concentrations and associated NAAQS values for PM10 during 2014 at EPA Station No. 35-001-0026 (3700 Singer Blvd NE). Source: http://www.epa.gov/airdata/

Date	**Air Monitoring Station ID**	**Measurement**	**Measurement Value**	**Standard**	**Units**
02/19/2014	35-001-0026	Daily Mean PM10 Concentration	147	150	ug/m3
05/07/2014	35-001-0026	Daily Mean PM10 Concentration	131	150	ug/m3
10/07/2014	35-001-0026	Daily Mean PM10 Concentration	127	150	ug/m3

Residents of the impacted community are concerned with the high density of polluting industries already located within their neighborhood and the burden it imposes on community health. Although the impacted neighborhoods comprise only 2.7% of Bernalillo County's population, more than 15% (105/694) of facilities permitted to emit air pollutants are located within a 2-mile radius of the Edith Station (Figure 16; Attachment 3).

Figure 16. Map of facilities with air pollution permits, schools, day care centers, nursing homes, and youth detention facilities within a 2-mile radius of the proposed Edith Station.

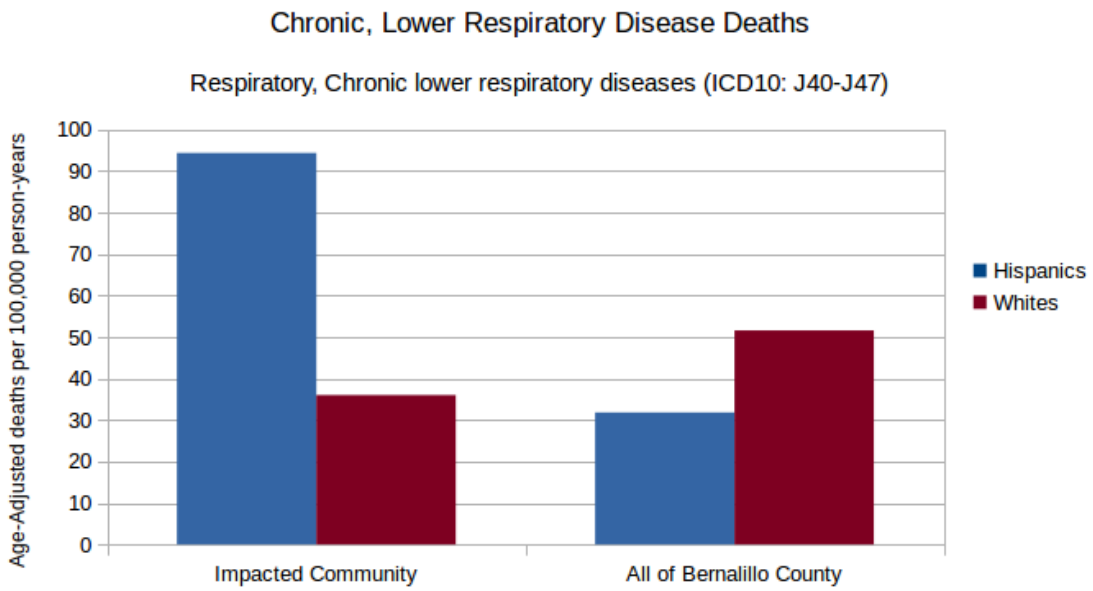


These facilities represent a variety of industries, and include fuel stations, boilers, sheet metal manufacturers, dry cleaners, wood manufacturers, aggregate processing, auto body shops, asphalt plants, concrete production plants, abrasive blasting, assorted manufacturing, and crematoria. Air pollutants that are emitted consist of carbon monoxide, nitrogen oxides, sulfur dioxide, $PM_{2.5}$, PM_{10}, VOCs, and lead (Attachment 3). Based on seasonally prevailing winds, pollutants from these facilities can be transported throughout the adjacent neighborhoods and are likely to contribute to the health inequities observed in the impacted community.

The SWD facility is currently permitted by the COA (Permit No. 659) as a gas service/fleet station. According to officials with Albuquerque-Bernalillo County Air Quality Control Board (personal communication), the SWD fleet station is currently permitted to release up to a maximum of 0.42 tons per year of VOCs. While no data is currently available on actual emissions from this site, the operation of the proposed Edith Station would likely result in increased emissions of air pollutants simply due to a more intensive land use and a larger truck fleet.

A comparison of death rates for health outcomes that can be attributed to air pollution, including lower respiratory disease, cardiovascular disease, and cerebrovascular (stroke) disease indicate that Hispanics of the impacted community experience a far greater death rate when compared to Hispanics and non-Hispanic whites of Bernalillo County and to non-Hispanic whites of the impacted community (Figures 17-19).

Figure 17. Ave. annual death rates for lower respiratory tract disease (chronic lower respiratory diseases – ICD10: J40-J47) in Hispanics and non-Hispanic whites in the impacted community and Bernalillo County.



Source: NM Dept. of Health, IBIS.

Figure 18. Ave. annual death rates for cardiovascular disease (Heart disease – ICD10: 100-109, I11, I13, 120-151) in Hispanics and non-Hispanic whites in the impacted community and Bernalillo County.

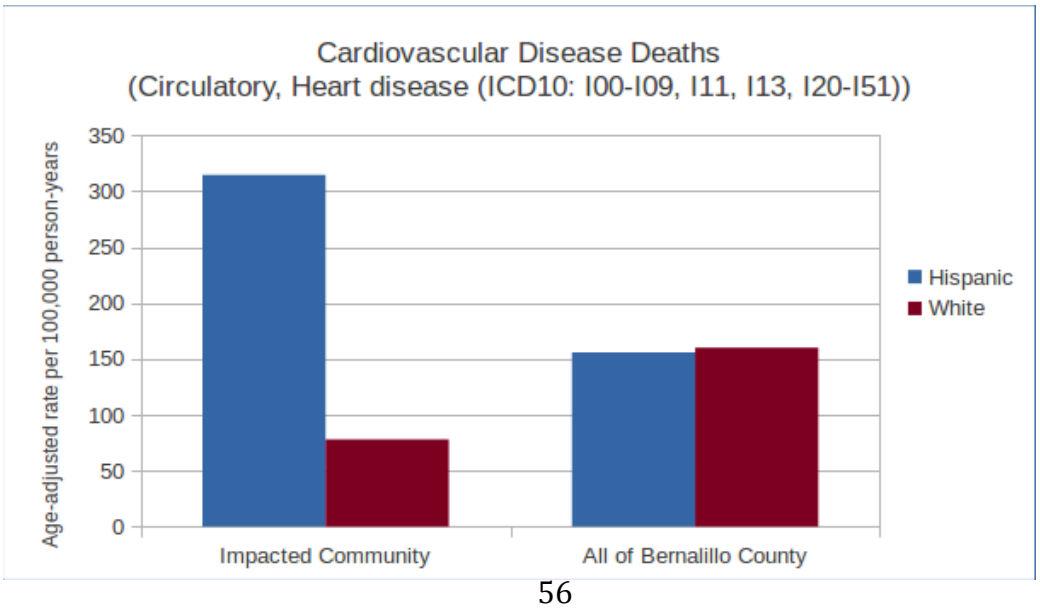
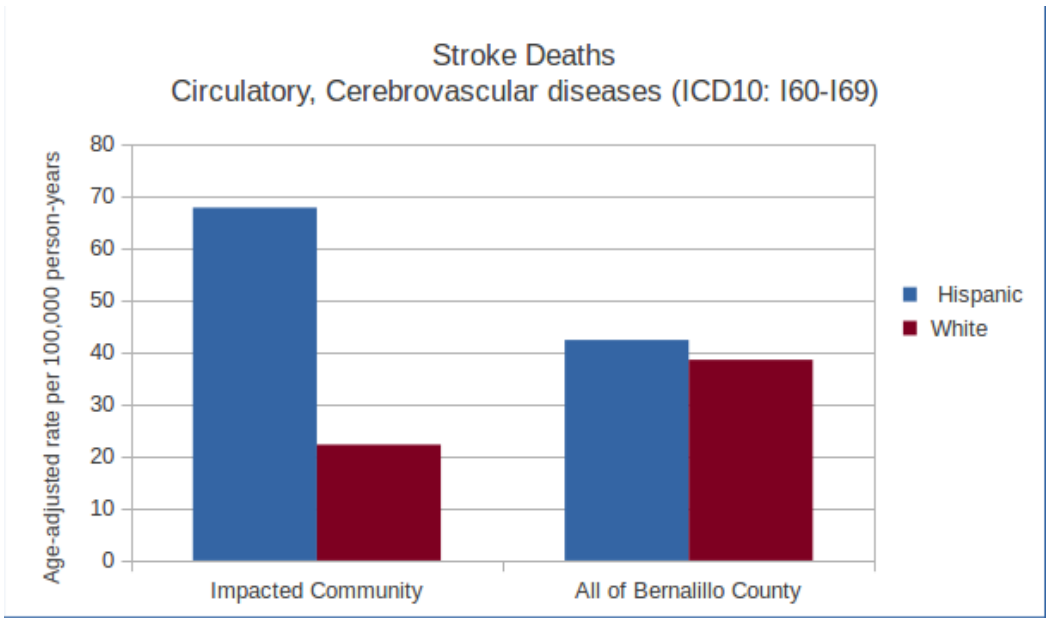


Figure 19. Ave. annual death rates for strokes (Cerebrovascular diseases – ICD10: 160-169) in Hispanics and non-Hispanic whites in the impacted community and Bernalillo County[6].



Source: NM Dept. of Health, IBIS

While no particular facility can be associated with specific instances of lower respiratory disease, cardiovascular disease or cerebrovascular disease, the presence of a high density of air pollution sources contributes to the burden of high death and disease observed for Hispanics residing in the impacted community. In other U.S. communities where WTSs have been placed, residents report experiencing unusually high asthma rates and respiratory problems, among other health concerns (National Environmental Justice Advisory Council, Waste and Facility Siting Subcommittee, and Waste Transfer Station Working Group, 2000).

<u>Predicted Air Pollution Issues in the Impacted Community</u>

Air emissions from WTSs can originate from a number of sources. These may include dry, dusty waste delivered to a WTS and exhaust from trucks, loaders, equipment, and vehicles. Some measures that have been proposed to mitigate air pollution include requiring garbage trucks to reduce unnecessary idling, using more efficient engines with cleaner fuels, spraying or misting wastes upon unloading, and keeping internal and external arterial streets clean and paved (EPA, 2001). Air emissions can also increase in the vicinity of a WTS because more garbage trucks are accessing the site within a given period of time. Garbage trucks in particular are some of the oldest (nationally, 41% are over a decade old), least fuel efficient, highest polluting vehicles on the road.

[6] Due to the small number of health events and/or population numbers, cerebrovascular death rate statistics are unstable for non-Hispanic whites for the impacted community. However, data from NMDOH IBIS is considered the most reliable for sub-county analysis of health.

The majority of garbage trucks (90%) use diesel fuel. While the EPA, in recognizing the extreme toxicity of diesel fuel emissions, has repeatedly lowered emission standards for heavy truck diesel engines, owners of older diesel vehicles have not been required to meet these low emission levels (Richards and Suozzi, 2011). These older vehicles continue to comprise a substantial proportion of the existing fleet nationwide and pose significant threats to the communities in which they operate.

Diesel engine emissions include carbon monoxide, nitrogen oxides, and fine particulate matter consisting of over 40 carcinogens, including benzene, arsenic and formaldehyde, which are among the most dangerous to health. These emissions, unlike power plants or other fixed emitting sources, are released near ground level, thereby significantly increasing exposure to those nearby (Richards and Suozzi, 2011). Death and disease from exposure to diesel exhaust particulate matter is high, with approximately 21,000 individuals in the U.S. succumbing each year. It is estimated that over 400,000 asthma attacks and 27,000 heart attacks can be attributed to diesel emission particulate matter each year. The increase in emergency room visits, hospitalizations, and lost school or workdays is significant (Clean Air Task Force, 2005).

Predicted Air Pollution and Health in the Impacted Community

Current data on the burden of a high density of air polluting industries in neighborhoods surrounding the proposed Edith Station and high poverty and minority representation appear to be linked to high rates of stroke, heart disease and lower respiratory disease among Hispanics within the impacted community (Figures 17-19). The health burden among Hispanics would likely become greater with air pollution generated by the Edith Station's operations and increased traffic.

Moreover, given the evidence of the alarming health effects of air pollution on children, it is worth noting that the site of the proposed Edith Station is in close proximity to locations where children are concentrated. If we restrict our attention to all schools, daycare centers, baseball parks, and youth facilities within a 2-mile radius of the Edith Station site, it is clear that a substantial number of young people are already exposed to a high density of polluting sources during those hours when these facilities are regularly used.

Additionally, with the opening of a new baseball field across the street from the proposed site, many children are now playing Little League there. According to Mary Werner, president of the North Valley Little League, 2-3 teams (playing T-Ball to Softball) practice at the field 3 times a week during Little League season. In total, there will be 190-202 games played (telephone call with Jen Parker and Mary Werner, 5/17/2015 and 5/19/2015). Children will be at an increased risk of respiratory disease attributed to air pollutants because of their age and the development of their lungs and greater respiratory rates while exercising.
Table 11 documents the distances for each of the public schools within a 2-mile radius of the proposed Edith Station. Table 12 presents analogous information for day care centers and nurseries within this catchment area, and Table 13 shows

distances for senior residential facilities.

Table 11. Distances of public schools to the proposed Edith Station.

School	Address	Distance
La Luz Elementary School	225 Griegos Rd. NW	0.72 miles
Garfield Middle School	3501 6th St. NW	1.22 miles
Mission Avenue Elementary School	725 Mission Ave. NW	1.36 miles
MacArthur Elementary School	1100 Douglas MacArthur Rd. NW	1.41 miles
Hodgin Elementary School	3801 Morningside Dr. NE	1.65 miles
Valley High School	1505 Candelaria Rd. NW	1.73 miles
Griegos Elementary School	4040 San Isidro St. NW	1.89 miles
Albuquerque High School	800 Odelia Rd. NE	1.99 miles
Cochiti Elementary School	3100 San Isidro Rd. NW	2.01 miles

Table 12. Distances of day care centers to the proposed Edith Station.

Day School	Address	Distance
Creative Cooperative	606 Candelaria Rd. NW	0.99 miles
Debbie Gomez Home Day Care	513 Delamar Ave. NW	0.99 miles
All Angel's Episcopal Day School	601 Montano Rd. NW	1.22 miles
Toddler Town	1105 Candelaria Rd. NW	1.30 miles
Guillermina Becerra Child Care	5007 San Luis Pl. NW	1.31 miles
Altamonte Child Development Center, Inc.	3305 Alta Monte Ave. NE	1.40 miles
The Children's House Montessori School	915 Montano Rd. NW	1.44 miles
Schools with Special Academic	3802 Hermosa Dr. NE	1.56 miles
Choices for Children Day School	808 Menaul Blvd. NW	1.59 miles
ABC Preschool and Childcare	3615 Candelaria Rd. NE	1.61 miles
Dove's Child Care	633 Camino Floretta NW	1.64 miles
Children's Center	4001 Montgomery Blvd. NE	1.71 miles
Calico Butterfly Preschool	1100 Indian School Rd. NE	1.89 miles

Table 13. Distances of senior living centers to the proposed Edith Station.

Senior Living Centers	**Address**	**Distance**
Preferred Assisted Living, Inc.	4308 Tulane Dr NE	1.39 miles
Wellesely Care Home	3209 Wellesley Ct NE	1.40 miles
Advanced Health Care of Albuquerque	2701 Richmond Dr NE	1.43 miles
New Mexico Center for Nursing Excellence	3200 Carlisle Blvd NE # 205	1.59 miles
Home Instead Senior Care	585 Osuna Rd NE Suite F, NE	1.95 miles

Given the proposed increase in the number of daily visits by garbage trucks and semi-trucks to the proposed Edith Station and the more intensive land-use of a WTS, it is evident that the considerable increase in diesel emissions, other vehicle emissions, and Edith Station operation emissions would lead to greater levels of air pollutants in the impacted community.

Data gathered from other WTSs indicate that increases in particulate matter, such as dust and glass, can be expected (National Environmental Justice Advisory Council, et. al., 2000). One can expect corresponding increases in the burden of respiratory diseases, cardiovascular diseases, and strokes among residents, especially so among vulnerable children. Table 14 shows how air pollutants generated by the Edith Station will diminish the health of residents who reside or exercise in the impacted community.

Table 14. Summary of air pollutants and health

Indicator	Health Impact	Magnitude	Severity	Strength of Evidence
Chronic Lower Respiratory Disease (disease and deaths)	-	Moderate	High	***
Cardiovascular Disease (disease and death)	-	Moderate	High	***
Stroke (disease and deaths)	-	Moderate	High	***

Explanations (Table adapted from Human Impact Partners, 2011):
Impact refers to whether the Edith Station will improve (+), harm (-), or not impact health effects (~).
Magnitude reflects a qualitative judgment of the size of the anticipated change in health effects (e.g., the increase in the number of cases of disease, injury, adverse events): Negligible, Minor, Moderate, Major.
Severity reflects the nature of the effect and its permanence: High = severe, Mod. = moderate, Low = not severe.
Strength of causal evidence refers to the strength of the research showing causal relationship between air pollution and the health outcome: * = plausible but insufficient evidence, ** = likely but more evidence is needed, *** = high degree of confidence in causal relationship.

Climate Change, Water Quality, and Flooding

Climate Change

According to the Assessment of Climate Change in the Southwest United States, a report prepared for the National Climate Assessment (NCA, 2013), the Southwest is considered to be one of the most "climate-challenged" regions of North America. Climate variability has caused droughts, floods, heat waves, cold snaps, heavy snowfalls, severe winds, intense storms, and acute air-quality conditions. Climate scientists have high confidence that the climate of the Southwest will continue to change through the 21st century and beyond in response to human-generated heat trapping greenhouse gas emissions, and will continue to vary in ways that can be observed in historic and paleoclimate records (NCA, 2013).

According to the Union of Concerned Scientists, New Mexico is the sixth-fastest-warming U.S. state; its average annual temperature has increased by an average of 0.603 degrees per decade since 1970. Regionally, the average annual temperature across the Southwest has increased by approximately 1.5°F and is projected to rise another 2.5 to 8°F by 2100. Average precipitation will decrease in the southern Southwest and perhaps increase in northern Southwest. Precipitation extremes in winter will become more frequent and more intense. Late-season snowpack will continue to decrease as will declines in river flow and soil moisture. In some areas, surface water quality will be affected by scarcity of water, higher rates of evaporation, and higher runoff due to increased precipitation intensity, flooding, and wildfire.

Climate Change and Ozone Pollution

Higher temperatures associated with climate change could make air pollution worse. The strong positive relationship between high temperatures and ozone formation is well established (Jacob, et al., 2009). This relationship has been shown both in large cities such as New York City and small cities such as Albuquerque. In addition to enabling the basic chemical reactions that create ground-level ozone, high temperatures often create stagnant air conditions that cause air pollution to settle over an area and remain for a longer time, which in turn increases the potential for human exposure to harmful ozone concentrations (Logan, 1989).

Residents' and Businesses' Concerns

1. Residents are concerned that negative impacts associated with the Edith Station will be compounded by changes brought about by climate change.
2. Residents are concerned about how the Edith Station might contribute to contamination of surface water routes (e.g., the Rio Grande and laterals) from surface water runoff occurring during more frequent and severe episodes of flash flooding attributed to climate change.
3. Residents are concerned about how the presence of increased rooftops and concrete might intensify the heat island effects should temperatures increase with climate change.
4. Businesses are concerned about how flash flooding may impact them.

The Association between Climate Change and Health

According to the EPA, changes in climate may enhance the spread of some diseases. Disease-causing agents, called pathogens, can be transmitted through food, water, and animals such as deer, birds, mice, and insects. Climate change could affect all of these transmitters. Food-borne diseases, water-borne diseases such as Giardia, and animal-borne diseases such as Lyme disease and West Nile virus are health risks. In 2002, a new strain of West Nile virus, which can cause serious, life-altering disease, emerged in the United States. Higher temperatures are favorable to the survival of this new strain.

Impact of Climate Change on Low-Income and Communities of Color

The disproportionate impacts that climate change has on vulnerable communities most often can be linked to the historical economic disenfranchisement of these neighborhoods through decades of well-documented financial redlining by banks and harmful land-use decisions by local governments. Many lack the basic infrastructure and economic opportunity to withstand environmental disasters, thus making the public health and economic consequences more severe. Events like Hurricane Katrina, Superstorm Sandy, California's record-breaking drought, and the recent snowstorm in the east have brought to surface the raw inequalities in vulnerable communities' resources to withstand and recover from these disasters.

Given their limited access to healthcare, low-income and some minority groups tend to suffer greater impacts when exposed to air pollution. Socioeconomic status is an important determinant of differences in asthma prevalence and severity among ethnic minorities in the United States. Further, very young children, poor children, and children from Spanish-speaking families appear to be at particularly high risk for inadequate asthma therapy—e.g., the use of inhalers (Miller, 2000).

Current Climate Change and Health in the Impacted Community

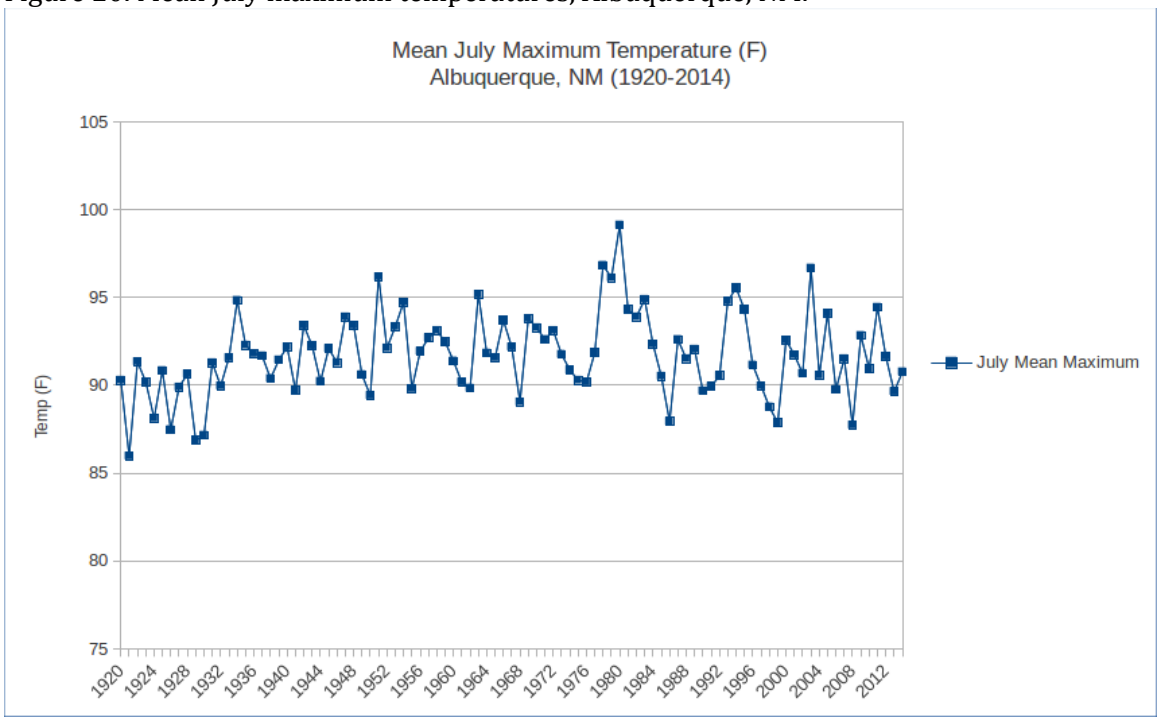
Infrastructure, such as concrete, pavement, and metal have lower albedo and higher heat capacity, which means more energy is absorbed within the community raising surface temperature. As surface temperature rises, air temperatures also rise, which can affect local microclimate conditions (Voogt and Oke, 2003).

Vegetation plays an important role in regulating surface and air temperature. Deciduous trees provide shading for the ground's surface and blocks sun radiation. Plants also release water into the surrounding air via evapotranspiration, which dissipates ambient heat and lowers air temperature (EPA, 2013). Reducing impervious surfaces and increasing tree canopy decreases ambient air temperatures.

Albuquerque experiences higher average annual temperatures than other regions of the US, with mean July temperatures ranging from 85 to 100 degrees, depending on the year (figure 20). Local temperatures at or near the Edith Station site are likely higher since there is a lack of protective vegetation cover as shade, a high

proportion of impervious surfaces, and the presence of metal buildings and rooftops.

Figure 20. Mean July maximum temperatures, Albuquerque, NM.



<u>Predicted Climate Change and Health in the Impacted Community</u>

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.

Table 15 shows how higher localized temperatures will diminish the impacted community's health.

Table 15. Summary of climate change and temperature-related health impacts

Indicator	Health Impact	Magnitude	Severity	Strength of Evidence
Vector-borne Disease	(-)	Negligible	Mod.	***
Heat related illness	(-)	Moderate	Mod.	***

Explanations (Table adapted from Human Impact Partners, 2011):
Impact refers to whether the Edith Station will improve (+), harm (-), or not impact health effects (~).
Magnitude reflects a qualitative judgment of the size of the anticipated change in health effects (e.g., the increase in the number of cases of disease, injury, adverse events): Negligible, Minor, Moderate, Major.
Severity reflects the nature of the effect and its permanence: High = severe, Mod. = moderate, Low = not severe.
Strength of causal evidence refers to the strength of the research showing causal

relationship between climate change/increased local temperatures and the health outcome: * = plausible but insufficient evidence, ** = likely but more evidence is needed, *** = high degree of confidence in causal relationship. A causal effect means the effect is likely to occur, irrespective of the magnitude and severity.

Water Quality and Storm Water

Water quality is determined by the physical and chemical properties of the water (EPA, 2012). Factors that influence water quality include land use, topography, presence of vegetation, soil composition, and pollutants. Storm water has three directions of movement in the hydrologic cycle: into the air (as evapotranspiration), underground (as downward infiltration and percolation), and over the land (as surface runoff) (EPA, 2003).

Impermeable surfaces, such as concrete and pavement, prevent storm water from infiltrating to the groundwater (Hsieh and Davis, 2005). Instead, water flows as runoff and pools in low-lying areas. As storm water runoff moves across a surface, it picks up solids that can be suspended in water (Hsieh and Davis, 2005).

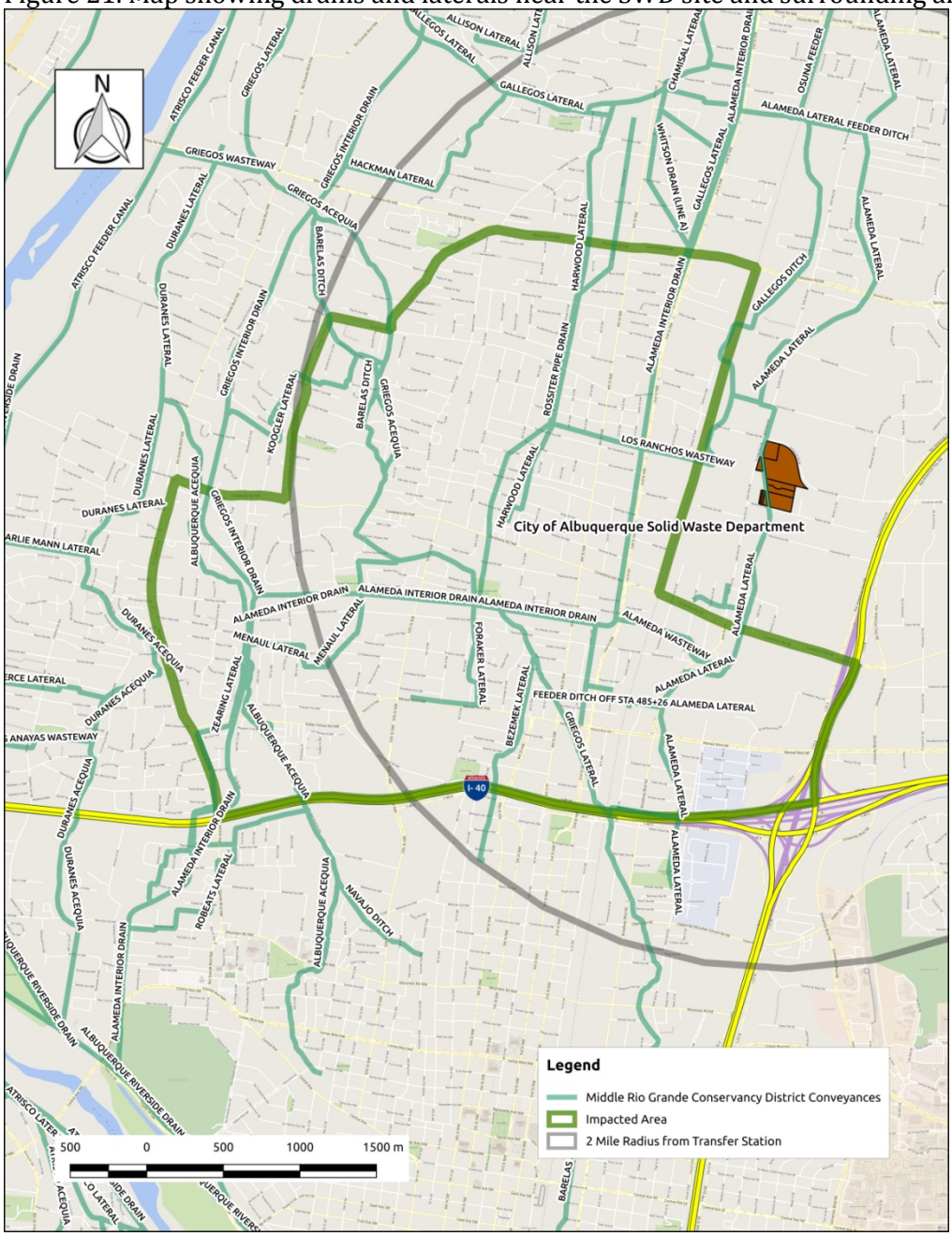
According to the EPA, pollutants deposited on the ground's surface are the leading cause of surface water impairment (EPA, 2003). Pollutant sources include vehicles, air pollution, dumpsites, and pollutants washed from rooftops. Pollutants from vehicles include engine oil and grease. Pollutant sources from illegal dumping include toxic chemicals and pathogens that can migrate from the surface to ground water or along the surface to nearby underground storm water drains, laterals or surface depressions.

Residents' and Businesses' Concerns

1. NV HIA Committee members and neighborhood residents have concerns regarding the Edith Station's contribution to storm water runoff and impacts to surface water and ground water quality.
2. Residents and business owners are concerned about possible drainage and storm water run off from the Edith Station.
3. Residents and business owners are concerned that the city's antiquated sewer system will be unable to handle the additional wastewater loads generated by Edith Station operations.

Due to the topography of the Edith Station property, which goes from a high point at the east to a low point at the west of the property, storm and surface water runoff has the potential to impair not only the water quality of the neighborhood's intricate surface water drainage and acequia systems (figure 21), but also the Rio Grande (since surface water runoff to the City's storm water drains goes untreated into the Rio Grande), and ground water.

Figure 21. Map showing drains and laterals near the SWD site and surrounding area.



<u>The Association between Water Quality and Health</u>

Water quality is directly linked to health (EPA, 2012). Substances such as heavy metals, pesticides and chemicals impact health. Exposure to waterborne pathogens can affect the gastro-intestinal tract causing diarrhea, vomiting, and abdominal pain. Exposure to toxic chemicals through ingestion of contaminated water or skin contact can also create illness or cause death (Craun, et. al, 2006). The Federal Clean Water Act has established water quality standards for pollutant discharges and regulated the discharge of pollutants into surface waters to protect human health.

Current Water Quality and Health in the Impacted Community

If not properly managed, industrial land-uses such as the current SWD and the proposed Edith Station can contribute to surface water and ground water pollution as a result of activities, such as: 1) equipment and vehicle washing, from which detergents, oils, and grease can travel into streets or storm drains and not into the sanitary sewer, 2) fueling at fueling islands that are uncovered and on a permeable surface, 3) storing hazardous substances outside without a canopy and in unsealed barrels, and 4) a lack of proper cleanup procedures in the event of a spill.

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 the following pollutants: dissolved oxygen, e. Coli (fecal matter), PCBs in fish tissue, and temperature. A Total Maximum Daily Load (TMDL) is currently being drafted for the e. Coli impairment. Designated uses that are fully supported for this reach of the Rio Grande include irrigation, wildlife habitat, and livestock watering. This reach of the Rio Grande does not support primary contact (e.g., wading in water) or marginal warm water aquatic life. This reach of the Rio Grande has not been assessed for use as a public water supply.

According to EPA's Enforcement and Compliance History online site, the COA has a poor compliance record for water related discharges. COA has been in violation of their water discharge permit for every quarter for the last three years, is currently out of compliance, and has had one significant violation and two formal enforcement actions in the last 5 years (EPA, 2015).

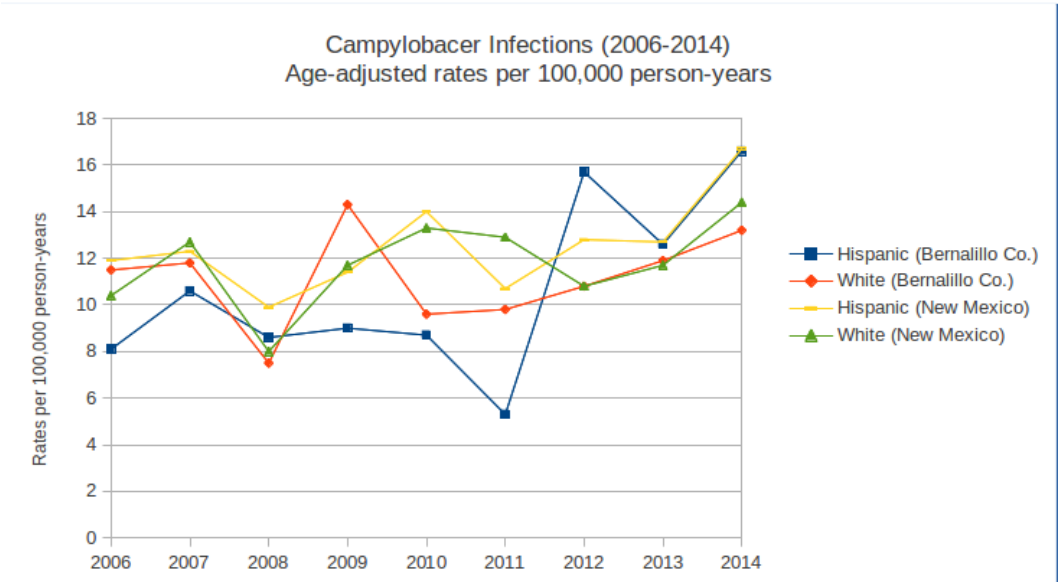
Although there have been no water samples collected from the Alameda Lateral that runs along the west side of the SWD site, in the absence of Best Management Practices, pollutants from SWD activities could impair the surface water flowing through the Alameda Lateral which drains into the Rio Grande where it is mixed with outflows of treated sewage effluent as it moves downstream.

Digestive diseases associated with exposures to waterborne pathogens are difficult to track and for this reason they are often underreported. Symptoms associated with exposure to waterborne pathogens include diarrhea, nausea, vomiting, and abdominal pain.

Figures 22-24 illustrate the time trends in water-borne diseases for Bernalillo County and New Mexico by Hispanic and non-Hispanic white. Unfortunately, these data are not available for the impacted community.

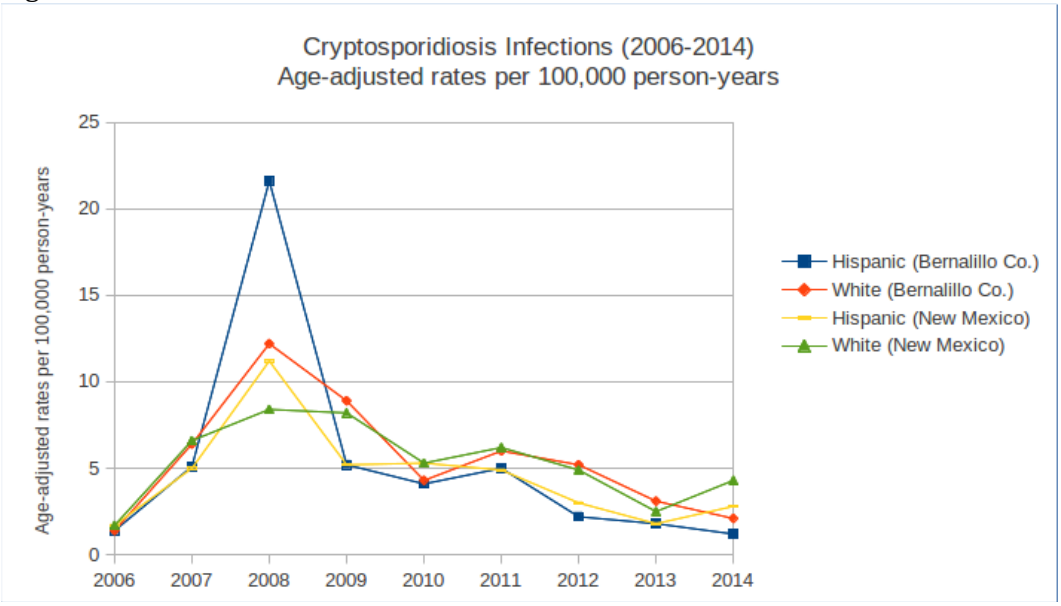
As indicated in Figure 22 below, campylobacter infections were greatest for Hispanics living in Bernalillo County and New Mexico from 2012 onward.

Figure 22



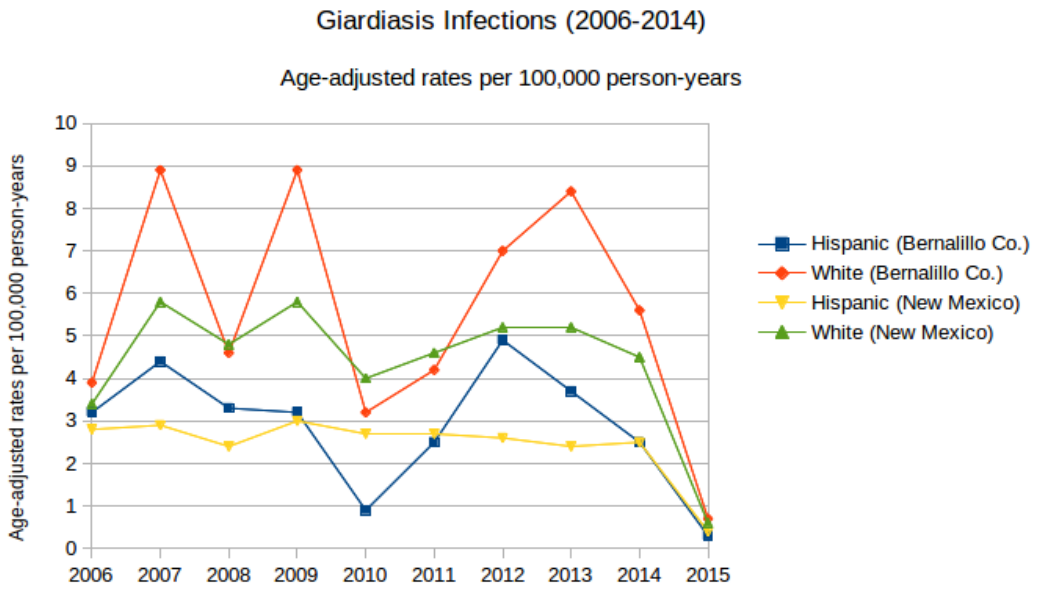
As indicated in Figure 23 below, with the exception of 2008, the trend in cryptosporidiosis infections occurring in Bernalillo County and New Mexico are quite similar.

Figure 23



As shown in Figure 24 below, with the exception of 2010 and 2011, giardiasis infections among non-Hispanic whites in Bernalillo County were greater than for Hispanic populations and for New Mexico as a whole.

Figure 24.



Predicted Water Quality and Health in the Impacted Community

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 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.

Potential risk of exposure to toxic chemicals in the impacted community will increase because of the more intense land use and increased contaminants associated with a WTS. Vulnerable populations (e.g., immune-compromised, elderly, and children) will be more at risk.

Table 16 shows how decreased water quality caused by Edith Station operations will diminish the impacted community's health.

Table 16. Summary of water quality-related health impacts

Indicator	Health Impact	Magnitude	Severity	Strength of Evidence	Notes
Water-borne Disease	(-)	Minor (see notes)	Moderate	***	Impact is dependent on whether exposure to water occurs through ingestion or contact with the skin.

Explanations (Table adapted from Human Impact Partners, 2011):
Impact refers to whether the Edith Station will improve (+), harm (-), or not impact health effects (~).
Magnitude reflects a qualitative judgment of the size of the anticipated change in health effects (e.g., the increase in the number of cases of disease, injury, adverse events): Negligible, Minor, Moderate, Major.
Severity reflects the nature of the effect and its permanence: High = severe, Mod. = moderate, Low = not severe.
Strength of causal evidence refers to the strength of the research showing causal relationship between water quality and the health outcome: * = plausible but insufficient evidence, ** = likely but more evidence is needed, *** = high degree of confidence in causal relationship. A causal effect means the effect is likely to occur, irrespective of the magnitude and severity.

Flood Management

Residents' and Businesses' Concerns

1. Flooding is one of the community's and the businesses' major concerns. NV HIA Committee members mentioned that after heavy rainfalls, water flows from the high elevation of the SWD site at the eastern boundary to the low elevation of the site at the western boundary.
2. Although there is a large storm water pond at the northwest corner of the site, according to residents it rarely holds water due to site topography. Residents mentioned that water flow from the SWD site runs onto their property during heavy rain events.
3. A newly developed baseball field located across the street from the SWD property on Edith Blvd. required the installation of pumps to prevent flooding during rains.
4. Sometimes the Alameda Lateral, which runs through the SWD site on the west side, overflows because of debris washed into the lateral during high rain events.

<u>The Association between Flooding and Health</u>

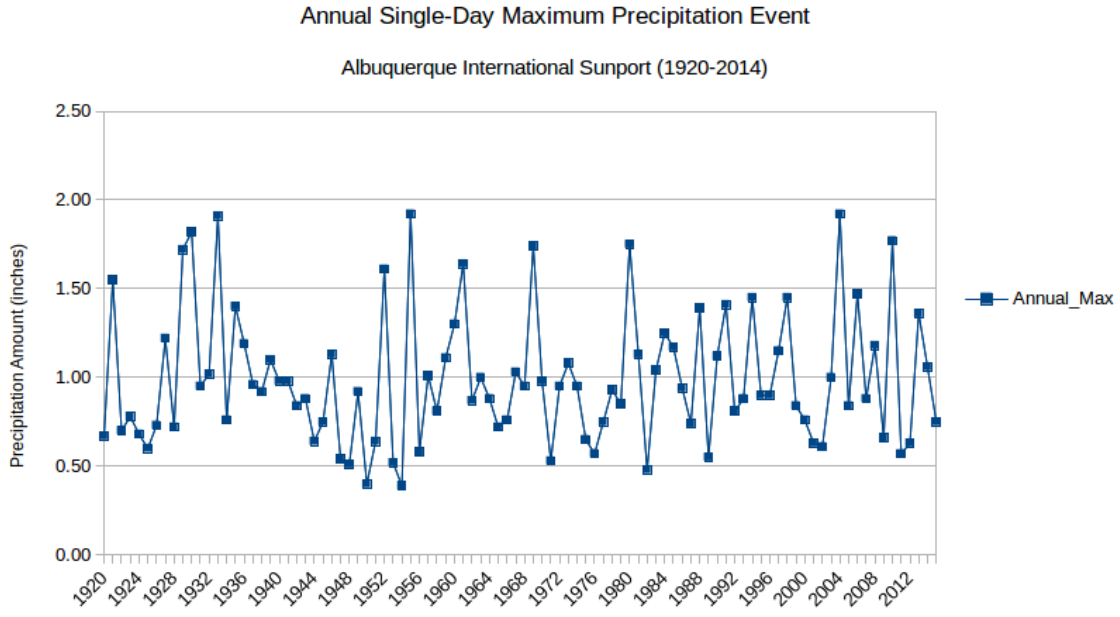
Flooding not only causes property damage, but also leads to storm water overflows and infrastructure and building damage (Plate, 2002). Flash flooding increases the risk of injury by creating hazards for falls and injury from floating debris (Maantay and Maroko, 2009).

Flooding and Housing Quality
When a home is damaged through flooding, resident displacement, mold and bacterial growth, and pest infestations can result. Health outcomes associated with poor housing conditions include lower quality of life, higher levels of stress, increased risk of heart disease, premature death, and increased risk of Hantavirus and Salmonella due to rodents. Indoor mold contributes to respiratory symptoms, allergies, asthma, and perturbation of the immunological system (WHO, 2009). As exemplified during Hurricane Katrina in New Orleans, low-income communities are frequently the least able to recover from flood damage because of their limited resources, for example a lack of flood insurance and limited access to health care.

Flooding and Vector Borne Disease
Populations that live in low lying areas have an increased risk of flooding along with an increased risk of being exposed to vector-borne diseases because of animals that may inhabit areas that hold stagnant water, such as illegally dumped tires (Calhoun, et. al., 2007; Vazquez-Prokopec, et. al., 2010; LaDeau, et. al., 2013).

Current Flooding and Health in the Impacted Community
As Figure 25 demonstrates, single day maximum precipitation events resulting in greater than 1.5 inches of rainfall have occurred on eleven occasions since 1920. Of the eleven events, 2 have occurred since 2004.

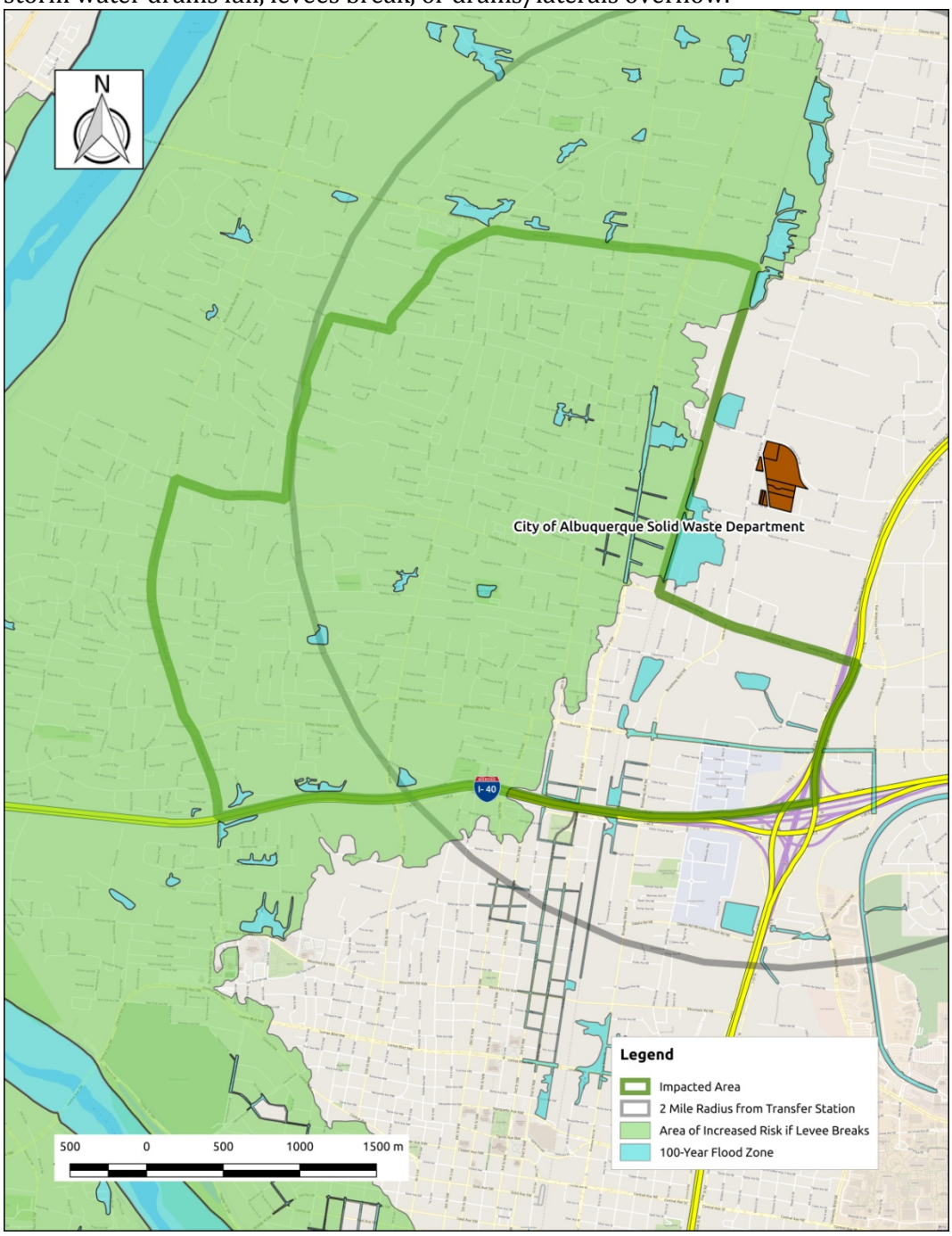
Figure 25



High precipitation events can lead to very localized flash flooding, the impacts of which can lead to severe flood damage if storm drains and laterals back up. As illustrated in figure 26, the community located directly west of the Edith Station site is at risk should protective laterals, canals, or drains fail. The green area represents

the area that is most likely to be impacted by heavy rainfall and flash floods should laterals overflow due to increased debris or water loads. Further, communities impacted by a 100-year flood are dispersed throughout (light blue).

Figure 26. Map illustrating 100-year flood zone designations and potential areas at risk if storm water drains fail, levees break, or drains/laterals overflow.



Predicted Flooding and Health in the Impacted Community

Since the Edith Station site and surrounding area is predominantly covered by pavement and concrete it is largely an impervious area. Therefore, depending of 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.

Table 17 shows how flooding occurring up-gradient of and at the Edith Station site will diminish the down-gradient community's health.

Table 17. Summary of health impacts in the event of flooding and increased storm water runoff to down-gradient communities.

Indicator	Health Impact	Magnitude	Severity	Strength of Evidence
Vector-borne Disease	(-)	Moderate	Moderate	***
Respiratory Disease	(-)	Moderate	Moderate	***

Explanations (Table adapted from Human Impact Partners, 2011):
Impact refers to whether the Edith Station will improve (+), harm (-), or not impact health effects (~).
Magnitude reflects a qualitative judgment of the size of the anticipated change in health effects (e.g., the increase in the number of cases of disease, injury, adverse events): Negligible, Minor, Moderate, Major.
Severity reflects the nature of the effect and its permanence: High = severe, Mod. = moderate, Low = not severe.
Strength of causal evidence refers to the strength of the research showing causal relationship between flooding and the health outcome: * = plausible but insufficient evidence, ** = likely but more evidence is needed, *** = high degree of confidence in causal relationship. A causal effect means the effect is likely to occur, irrespective of the magnitude and severity.

Noise
Noise is unwanted sound that is measured in decibels (dB). Noise reporting takes into account the frequency range of the human ear and is measured in Aweighted decibels (dBA). Normal conversation ranges about 50–60 dBA, while a fire engine siren at 100 feet is about 110–120 dBA (Berland and Lindvall, 1995). The World Health Organization (WHO) considers noise to be an environmental pollutant (WHO, 1972).

Residents' and Businesses' Concerns

1. Residents feel that noise in the area is a major contributor to decreased quality of life and to many health outcomes, including high blood pressure and heart disease, from which many residents suffer.
2. Residents are concerned about the effect of noise on children's ability to learn.
3. Residents worry about noise's potential effects on migraine headaches.
4. Residents are worried about noise associated with idling trucks, the maintenance shop, machinery, the air treatment systems, and overall Edith Station operations.
5. Businesses are concerned about the potential impact from noise on worker's health and safety.

<u>The Association between Noise and Health</u>
Former U.S. Surgeon General William H. Stewart (1967) stated, *"Calling noise a nuisance is like calling smog an inconvenience. Noise must be considered a hazard to the health of people everywhere".* In 1972, the federal Noise Control Act was passed, instructing the EPA to investigate and publish scientific information about exposure to noise and its effects. In response, the EPA issued the Level Documents (1974) describing exposure levels to noise necessary to protect public health.

Noise exposure is associated with sleep disturbance, hearing impairment, learning difficulties, performance reduction, increased blood pressure, cardiovascular disease, ischemic heart disease, changes in stress hormone levels, decreases in immune system functions, and Type II diabetes (WHO, 1999; Babisch, 1998; Berland and Lindvall, 1995). The EPA (1974) recommends an average 24-hr exposure limit of 55 dBA to protect the public from all adverse effects on health and welfare in residential areas.

There is a dose-response relationship for noise; as persistent noise levels increase, adverse health outcomes also increase. The biological pathway between noise and cardiovascular disease (hypertension and myocardial infarction) is based on noise-induced stress, which triggers the release of hormones such as cortisol and adrenaline, which in turn affect hypertension, blood lipids, and blood glucose, all of which are risk factors for cardiovascular disease (Berland and Lindvall, 1995; Van Kempen, et al., 2002). People who live near chronic road noise are twice as likely to have hypertension, while men are almost 4 times more likely to have hypertension (Barregard, et al., 2009). Furthermore, increasing community noise, such as traffic

noise, increases the risk of myocardial infarction at noise levels above 50–60 dBA (Babisch, 2014),

Traffic and Noise
Vehicle traffic is a significant source of noise in urban areas. The noise generated by vehicles depends on the number of vehicles, the speed of vehicles, the type of vehicles (trucks or cars), and the road surface. The more vehicles on the road, the higher the speeds, and the greater the proportion of trucks, the louder the traffic will be (Federal Highway Administration, 2006). An increase in traffic volume leads to a proportional increase in noise.

The literature states that noise from garbage trucks and diesel trucks ranges from 84 to 100 dBA, respectively (Berland and Lindvall, 1995). Exposure to 85 dBA for prolonged periods can result in gradual hearing loss, while exposure to 100 dBA for greater than one minute can result in permanent hearing loss. One diesel truck produces the noise effect of 32 passenger cars, and the noise level for starting up a diesel truck can exceed 90 dBA, the threshold for hearing loss (Transport Action, 2001).

Vulnerable Populations and Noise
Adverse health outcomes are particularly pronounced in children who have less well-developed immune, cardiovascular, and neurological systems, and therefore, have an additional risk from excessive ambient noise exposure. Evans examined children exposed to moderate road traffic noise (outside daytime > 60 dBA) (Evans, et al., 2001). The night time urine of children exposed to >60 dBA contained increased concentrations of free cortisol compared to children living in quieter areas (outside daytime level < 50 dBA). Studies have found that children exposed to intense ambient noise from traffic and aircraft at school may have lower reading and math scores than children who attend quieter schools (EPA, 1978). Populations vulnerable for adverse health outcomes from exposure to noise include children, the elderly, people with chronic illnesses, and people with a hearing impairment (Van Kemp and Davies, 2013).

<u>Current Noise Issues and Health in the Impacted Community</u>
The COA adopted a Noise Control Ordinance in 1974, re-adopted it in 1975 and again in 2001. The introduction to this Ordinance states, "A substantial body of scientific research has shown that exposure to excessive sound and vibration is a serious hazard to the public health, welfare, safety and quality of life. It is therefore declared to be the intent of the City Council (through this ordinance and through other City regulations) to minimize the exposure to the psychological dangers of excessive noise, and protect, promote and preserve the public health, safety and welfare. It is the express intent of the City Council to control the level of noise in a manner that promotes the use, value and enjoyment of property, conduct of business, sleep and repose and an environment free from unnecessary and excessive sound" (COA, Ordinance 9-2001).

This Ordinance further states that unnecessary noise should not be produced anywhere adjacent to a school, library, other institution of learning, religious institutions or hospitals. It also establishes acceptable general noise levels as follows:

Table 18. COA noise standards

Land Use Category	Time	Maximum dB
Residential	Daytime Nighttime	55 50
Office/Commercial	Daytime Nighttime	65 60
Industrial	Daytime Nighttime	75 70

Source: COA Noise Ordinance (accessed on line at: www.cabq.gov/environmentalhealth/ documents/chapter9noiseordinance.pdf). Accessed on May 2015.

The major sources of environmental noise related to the proposed Edith Station are the increases in traffic volume, the types of traffic, overall operations, and the cumulative impact of all noise-producing sites in the area. The current major noise producing facilities in the area include the SWD, Friedman Recycling, Holley Asphalt Plant, and the American Cement Company. Additionally, there are businesses such as the Gas Company of NM, the NM Public Service Company, Sysco, RotoRooter of New Mexico, and many others that use heavy trucks.

Members of the NV HIA Committee conducted noise measurements at the SWD, next door to the SWD on the corner of Edith and Comanche, at La Luz Elementary School, and in a variety of residential neighborhoods within a two-mile radius of the proposed Edith Station site from May 27 through June 4, 2015. These results are provided in table 19. Noise measurements exceeded the COA's noise standards both for the morning and the afternoon at all locations measured.

Table 19. Measured noise levels dated 5/27/15 – 6/4/15.

Site	Noise Level Standards (reported for daytime) per the COA noise ordinance	Measured Noise Level (dbA)	Time
Comanche, East of Edith	75	85-100 75-90	7:30 4:30
Garbage trucks travelling west on Comanche to enter the SWD	75	85-100 86-92	7:30 4:30
La Luz Elementary	55	75-85 75-85	7:30 4:30
Neighborhoods	55	88-95 88-95	7:30 4:30

The schools (two elementary, one middle school and one high school) within a two-mile radius of, and closest to the proposed Edith Station are primarily Hispanic and

have academic performance issues. Of the four closest public schools within a 2-mile radius of the proposed Edith Station site, La Luz Elementary is the nearest to the proposed Edith Station site (.72 mile), has the highest percentages of Hispanic students, the highest percentages of students who receive free or reduced cost lunches, the lowest school rating of D, and the lowest percentages of students who are proficient in reading and math, 34%, and 26.2%, respectively (Albuquerque Public Schools, 2013, accessed on-line May, 2015). Noise measurements taken at La Luz Elementary exceeded noise standards established by the COA noise ordinance. Student demographics, reading and math proficiencies, and distance to the proposed Edith Station site for all four of these schools are provided in table 20.

Table 20. School demographics, rating, distance to proposed Edith Station site.

School	Hispanic (%)	Free Lunch (%)	Rating	Reading Proficiency All	Reading Proficiency Hispanic	Math proficiency All	Math proficiency Hispanic	Distance to Edith Station site (miles)
La Luz Elem.	93.4	90	D	34	35.1	26.2	26.6	.72
McArthur Elem.	83.3	68.4	C	69	68.8	56.1	54.8	1.41
Garfield Middle	86.1	80.3	C	43.6	40.9	28.3	25.7	1.22
Valley	77.6	38.7	B	46	45	30.9	28.2	1.73

Predicted Noise and Health in the Impacted Community

The proposed Edith Station would result in a significant increase in traffic and noise due to increased heavy truck and vehicle traffic and Edith Station operations. These would negatively impact the health of the community. Negative outcomes include impaired or loss of hearing, increased stress and cardiovascular disease, and decreased performance at work and in school (Table 21).

Table 21. Summary of noise exposures and health impacts

Indicator	Health Impact	Magnitude	Severity	Strength of Evidence
Hearing impairment or loss	-	minor	high	***
Cardiovascular disease	-	minor	high	***
Sleep disturbances, impaired learning, and decreased school/work performance	-	major	high	***
Increase in stress levels, corresponding increase in hormone levels, and potential increases in Type II diabetes.	-	major	high	***

Explanations (Table adapted from Human Impact Partners, 2011):
Impact refers to whether the Edith Station will improve (+), harm (-), or not impact health effects (~).
Magnitude reflects a qualitative judgment of the size of the anticipated change in health effects (e.g., the increase in the number of cases of disease, injury, adverse events): Negligible, Minor, Moderate, Major.
Severity reflects the nature of the effect and its permanence: High = severe, Mod. = moderate, Low = not severe.
Strength of causal evidence refers to the strength of the research showing causal relationship between noise and the health outcome: * = plausible but insufficient evidence, ** = likely but more evidence is needed, *** = high degree of confidence in causal relationship. A causal effect means the effect is likely to occur, irrespective of the magnitude and severity.

Nuisances – Odors, Litter, Pests, and Vectors and Health
Residents' and Businesses' Concerns:

1. Residents are concerned about the impact of the proposed Edith Station on increased odors, litter, and pests – a common consequence of WTSs, and the potential for garbage being left overnight.
2. Residents and businesses are concerned about an increase in disease given the increase in garbage containing roaches, animal carcasses, and maggots.
3. Residents and business owners near the existing SWD facility feel that they are already exposed to high levels of odors, litter and pests.
4. Business owners near the existing SWD facility have repeatedly contacted the COA to complain about the ongoing presence of litter in their neighborhood without receiving adequate responses.
5. Residents are concerned that the establishment of a convenience center in their neighborhood will lead to a greater burden of illegal dumping when visitors bring waste to the facility during hours when it is not in operation.
6. Residents are concerned with an increase in vector-borne diseases.
7. Residents are concerned about trucks that remain parked overnight, and the pests that would be attracted to the Edith Station, including feral cats and rats.

Odors

A nuisance is considered to include anything that is injurious to health or offensive to the senses, interfering with the comfortable enjoyment of life and property. Nuisances may affect individuals or an entire community. When communities are affected by the storage, removal, transport, processing, or disposal of solid waste, the likelihood of nuisance problems becomes greater. Nuisances that have been associated with landfills and WTSs include odors and poor air quality, litter, and pests that serve as vectors for associated infectious diseases (Carpio, et al., 2015; Reynolds and Matt, 2013; Zak, 2013).

<u>The Association between Odors and Health</u>

An odor can be defined as "a chemical in the air that is 'smelled' or sensed by our nose (olfactory system)" (Ohio Bureau of Environmental Health, 2015). Humans breathe some 10,000 to 20,000 liters of air per day; thus, the olfactory systems may detect a variety of chemical odors throughout the day. Usually, odors can alert people to potential risks, but they also allow people to detect odors of chemicals that are present at concentrations below those that endanger health.

While exposure to unpleasant odors may indicate potential risks to health, they may also impose risks in and of themselves. Exposure to large industrial projects for example, whether animal production facilities, wastewater treatment plants, or landfills and WTSs, have been associated with health problems as diverse as eye, nose, and throat irritation, headache, nausea, vomiting, diarrhea, hoarseness, sore throat, cough, chest tightness, nasal congestion, palpitations, shortness of breath, tachycardia (increased heart rate), increased blood pressure, stress, drowsiness, and mood alterations (Schiffman, and Williams, 2005). Odors have been also been

linked to social and behavioral problems, stress, a reduced sense of well-being, and diminished enjoyment of life and ability to perform daily activities (Clougherty and Kubzansky, 2009). For those who are chemically sensitive, or who have asthma, exposure to certain odors related to industrial production and vehicle emissions are significantly more likely to report both upper and lower respiratory symptoms such as wheeze and dyspnea (Baldwin, et al., 1999). Sensitive populations include young children, pregnant women, the elderly, people with chronic health problems (especially those with asthma, emphysema, COPD), and persons with anxiety, depression and stress-induced illness (Ohio Bureau of Environmental Health, 2015). Because industrial operations and waste management sites are frequently sited near or in poor and minority communities, these groups are frequently exposed to unhealthful odors.

While some odors are caused by harmful chemicals that are regulated by the EPA under the Clean Air Act, other odors may not be regulated, making it quite difficult to address and/or enforce nuisance odor-type complaints (Ohio Bureau of Environmental Health, 2015). Complaints about odors are nonetheless widely reported by communities living adjacent to industrial operations. Whether an individual gets sick from exposure to odors depends on what they are exposed to, the amount they are exposed to, and how frequently they are exposed to the odor (New Hampshire Department of Environmental Services, 2012).

Current Odor Conditions and Health in the Impacted Community

Residents living in the impacted community and close to the proposed Edith Station are already exposed to environmental odors. Residents with conditions such as hypertension and migraines are particularly concerned about the effects of increased odors on their health.

Irritation of the upper respiratory tract can occur with chronic or acute exposures to toxic gases. This is especially true of the more water-soluble gases such as chlorine, ammonia, sulfur dioxide, and hydrogen chloride, which dissolve in the upper airway and immediately cause mucous membrane irritation. Though noxious odors may initially cause symptoms of nose and throat irritation and cough, prolonged exposure may lead to permanent damage to the upper respiratory tract, as well as distal airways and lung tissues (Newman, 2015). Damage to the upper respiratory tract may also give rise to infections by bacteria and viruses.

Data on death rates from respiratory diseases caused by pneumoconioses (damage from inhalation of dust) and certain toxic chemicals (represented by ICD10 codes of J60-J66, and J68), collected from New Mexico's Indicator-Based Information System (IBIS), suggest that existing levels of this particular category of respiratory disease are not common. Both whites and Hispanics exhibit an age-adjusted death rate that is 0.2 per 100,000 persons in Bernalillo County.

Although there is no mental health data for the impacted community specifically, data are available for Bernalillo County by non-Hispanic white and Hispanic sub-

populations. When asked whether their mental health, consisting of stress, depression, and problems with depression, was good during the past 30 days, 12.9% of adult non-Hispanic whites and 14.5% of adult Hispanics reported 14 or more days during which their mental health was not good.

Predicted Odor Conditions and Health in the Impacted Community

The placement of the Edith Station in the impacted community can result in an increase in the presence of unhealthful or obnoxious odors. Residents of other states who live close to WTSs have reported that odors and pervasive dust from these facilities aggravate allergies and impose housekeeping problems. This is especially true when the weather is hot, and residents must stay inside and incur the costs of running air conditioners to avoid odors. In addition, deodorizers frequently used to mitigate unpleasant odors have proven ineffective, and may themselves be aggravating allergies (National Environmental Justice Advisory Council, Waste and Facility Siting Subcommittee, and Waste Transfer Station Working Group, 2000).

Litter and Vectors

The Association between Litter, Vectors and Health

Vectors are defined as populations of birds, animals, mosquitoes, or other insects that can potentially transmit disease to humans. Landfills and WTSs, with their rich collections of garbage, attract vectors that harbor infectious diseases. Mosquitoes are among the most well known vectors in the world for transmitting infectious diseases to humans. In New Mexico, mosquitoes are known to transmit West Nile Virus, Saint Louis encephalitis, and Western equine encephalitis to humans. Similarly, flies are also known to create important public health problems, as they are vectors for many infectious diseases.

Rodents are known vectors or carriers of infectious diseases that carry risks for humans. Besides consuming and contaminating foods and animal feed, they may also cause structural damage to buildings through chewing, gnawing, and nest building activities.

Finally, illegal dumping is the illegal disposal of waste in an unpermitted area, and has become a serious problem in many communities in the US (EPA, 1998). Illegal dumping poses significant problems for public health, safety, property values, and quality of life. Illegal dumping is more common in low-income areas where residents may not be able to afford waste disposal fees, and where there are an abundance of industrial or undeveloped lots. It is also more common near existing junk yards, active and closed landfills, WTSs, and temporary dump areas near construction sites (EPA, 1998).

While most materials dumped illegally are not hazardous materials, they typically attract more waste, potentially introducing hazardous wastes such as asbestos, household chemicals, automotive fluids, or commercial and industrial wastes. These wastes may pose considerable health risks, as areas used for illegal dumping may be

accessible to children, rodents, insects, and other vermin. Moreover, illegally dumped material such as automotive tires can hold stagnant water, which are ideal breeding grounds for mosquitoes (EPA, 1998).

Current Conditions for Litter, Vectors and Health in the Impacted Community
Normal operations at landfills and WTSs generate stray waste that can become litter. This material includes litter that falls from garbage trucks as they transport waste, or material that is transported from the tipping area to areas outside. Residents and businesses that are adjacent to the SWD facility have long complained of litter that has piled up along fences, buildings, vehicles and other barriers. Litter attracts mice, rats, birds and mosquitos. Residents of the impacted community have complained of receiving multiple mosquito bites during the summer season and have expressed fears of contracting West Nile virus.

Birds can pose a significant nuisance, and may carry infectious diseases. Community residents and businesses have complained of a steadily increasing pigeon population in and around the existing SWD facility. Conway Electric, a company located adjacent to the SWD, recently removed all outdoor decorations as they had been ruined by pigeons.

Both mice and rats in New Mexico can infect people with diseases that include Hantavirus and rabies. Bubonic plague, while not carried by commensal rodents in New Mexico, can be transmitted from wild rodent species by fleas. Both bubonic plague and Hantavirus have been on the increase in New Mexico. To reduce the risk of acquiring these diseases, the Department of Health recommends limiting exposure to trash where rodents nest (New Mexico Department of Health, 2015).

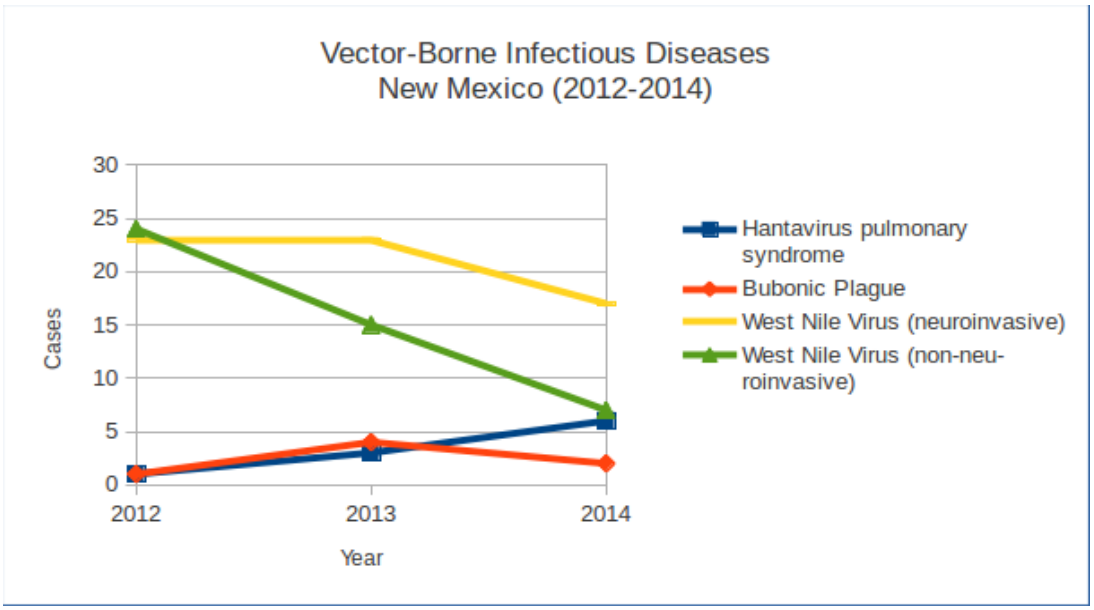
The number of vector-borne infectious diseases recorded in New Mexico between 2012 and 2014 are presented in Table 22 and Figure 27. While the numbers are low, Hantavirus pulmonary syndrome has increased from 1 case in 2012 to 6 confirmed cases in 2014. Bubonic plague, with similarly small numbers, has been observed each year through this period. The numbers of cases of West Nile Virus are significantly larger, and indicate that individuals living close to the Rio Grande (including the neighborhoods near the proposed Edith Station) are already at a greater risk of being exposed to mosquitoes carrying this virus.

Table 22. Number of cases of Hantavirus pulmonary syndrome, bubonic plague, and West Nile Virus in New Mexico between 2012 and 2014

Disease	**2012**	**2013**	**2014**
Hantavirus pulmonary syndrome	1	3	6
Bubonic Plague	1	4	2
West Nile Virus (neuroinvasive)	23	23	17
West Nile Virus (non-neuroinvasive)	24	15	7

Source: New Mexico Department of Health, 2015b.

Figure 27. Number of cases of Hantavirus pulmonary syndrome, bubonic plague, and West Nile Virus in New Mexico between 2012 and 2014.



The Edith Station will result in an increased probability of contracting diseases transmitted from mosquitoes and other vectors as the Edith Station can be expected to result in an increase in the quantity of rodents, insects, and birds.

Table 23 shows how nuisances, consisting of odors, litter, and vectors generated by the Edith Station will diminish the impacted community's health.

Table 23. Summary of nuisances, consisting of vectors, odor, and litter, on health

Indicator	Health Impact	Magnitude	Severity	Strength of Evidence
Vector-borne Disease	-	Moderate	Mod.	*
Upper Respiratory Disease	-	Major	High	***
Experiences of Stress	-	Major	High	**
Eye, nose, and throat irritation, headache, nausea, vomiting, diarrhea, hoarseness, sore throat, cough, chest tightness, and nasal congestion.	-	Moderate	High	***
Overall quality of life	-	Major	High	***

Explanations (Table adapted from Human Impact Partners, 2011):
Impact refers to whether the Edith Station will improve (+), harm (-), or not impact health effects (~).
Magnitude reflects a qualitative judgment of the size of the anticipated change in health effects (e.g., the increase in the number of cases of disease, injury, adverse events): Negligible, Minor, Moderate, Major.
Severity reflects the nature of the effect on the health effect and life expectancy and its permanence: High = severe, Mod. = moderate, Low = not severe.
Strength of causal evidence refers to the strength of the research showing causal relationship between nuisances and the health outcome: * = plausible but insufficient evidence, ** = likely but more evidence is needed, *** = high degree of confidence in causal relationship. A causal effect means the effect is likely to occur, irrespective of the magnitude and severity.

Occupational Safety and Health

Residents' Concerns

1. Residents are concerned their community will be subjected to significant increases in occupational injuries and risks associated with the proposed Edith Station.
2. Residents have greater career aspirations for their families than handling other people's trash.

<u>The Association between WTS Occupational Safety and Health</u>

The U.S. Department of Labor has concluded that 'refuse and recyclable material collection' is the fifth most dangerous industrial occupation in the U.S., with death rates averaging 30 per 100,000 persons (Bureau of Labor Statistics, U.S. Department of Labor, 2014). WTSs constitute a central node in many solid waste processing streams, as they concentrate commercial haulers, general public self-haulers, and facility operators into a high-activity, confined area where workers are exposed to a plethora of hazards (Sutton, 2014). Hazards are related to the physical dangers of working in the WTS, the nature of the material being handled, and the growing complexity of separation and processing activities. Individuals working in WTSs are exposed to health and safety risks that include falls, slips, and trips; lacerations, punctures, and cuts; flying objects and projectiles; collisions (vehicle-vehicle, vehicle-pedestrian, vehicle-building); spills, splashes, or release of acids, caustics and toxics; moving parts of vehicles and machinery that move waste; falling material; electrocution; fires; explosions, confined space hazards; and environmental exposures to dust, noise, toxic fumes, exhaust gases and smoke, or infectious agents. Moreover, heavy physical labor also poses risks of heart attacks or other medical/health emergencies. Clearly, risk exposure varies considerably amongst facility employees and users, though the lowest-paid workers on the WTS floor are the most at risk (Sutton, 2014).

<u>Current Occupational Safety and Health in the Impacted Community</u>

There are currently a total of 50 employees who work in Vehicle Maintenance with the City, all of whom would be eventually moved to the proposed Edith Station. In addition, 193 SWD employees would pass through the Edith Station in the course of their daily rounds. While it was not possible to locate information about occupational hazards by New Mexico Department of Health Small Areas, it was possible to locate data on unintentional injuries by Small Area.

Figure 28 shows age-adjusted unintentional injury death rates in both the impacted community and in Bernalillo County. The death rate in the impacted community is considerably higher (70.3 versus 58.7 per 100,000 persons).

Figure 28. Ave. annual age-adjusted unintentional injury death rates (per 100,000 persons) for the impacted community and Bernalillo County. Source: NM Dept. of Health, 2015b

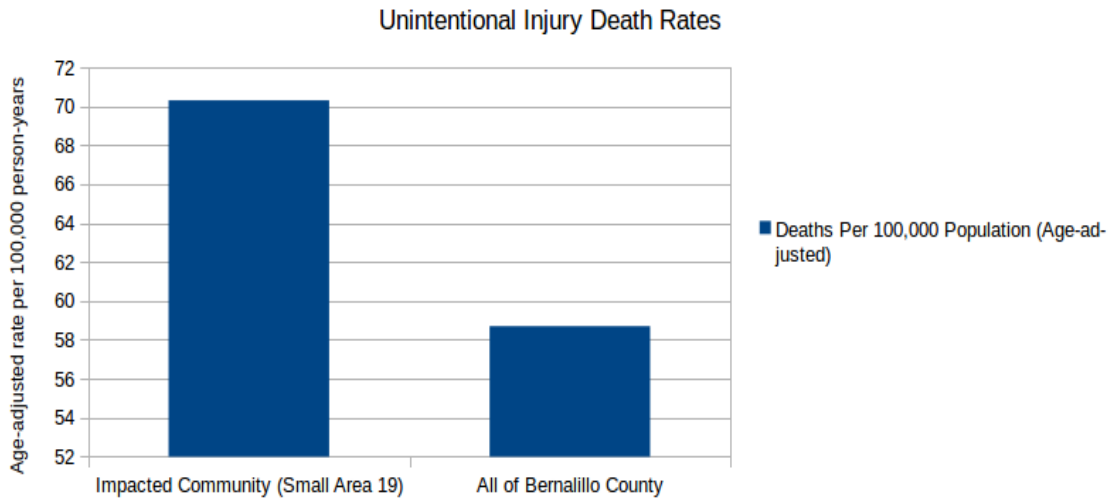
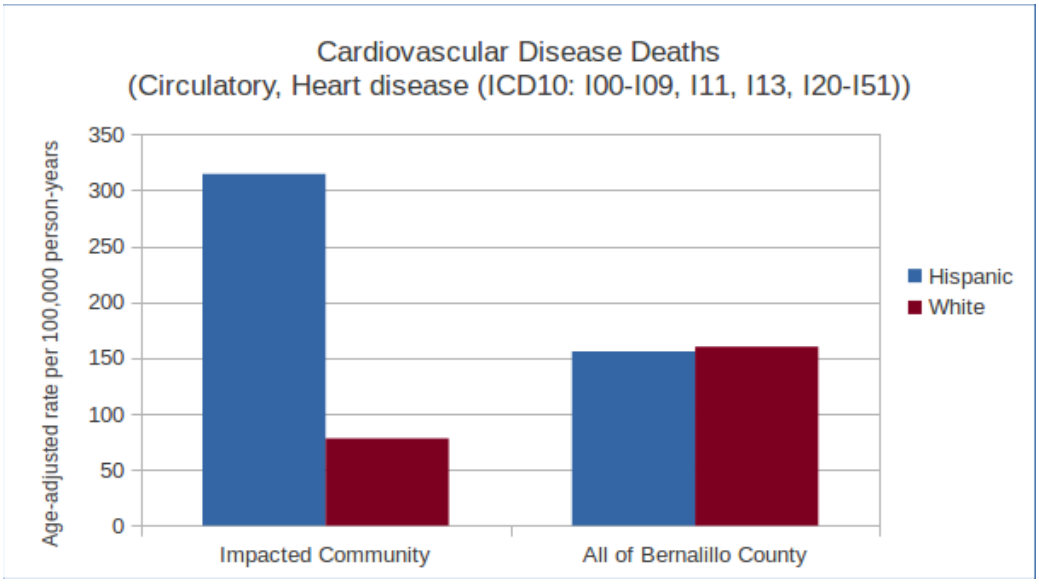


Figure 29 shows cardiovascular deaths in the impacted community and Bernalillo County. Among Hispanics, the rate of cardiovascular deaths in the impacted community is 314.5 per 100,000 persons and 155.8 per 100,000 persons in Bernalillo County. Particularly striking are the comparisons in deaths among Hispanics and non-Hispanic whites in the impacted community, 314.5 versus 78 per 100,000 persons.

Figure 29. Ave. annual age-adjusted cardiovascular disease death rates in the impacted area and Bernalillo County for Hispanics and whites. Source: NM Dept. of Health, 2015b



Predicted Occupational Safety and Health in the Impacted Community

While all vehicle maintenance and SWD employees would be exposed to some level of occupational risk associated with Edith Station operations, employees that work on the tipping floor are at a greater risk from accidents associated with vehicles and machinery. It is expected that the impacted community would be subject to significant increases in occupational injuries and risks associated with this extremely dangerous occupation.

Workers at the Edith Station can be expected to experience many or all of the occupational risks outlined above. This includes physical, chemical, environmental and equipment injuries; exposure to indoor air pollution and odors from toxic substances; and exposure to heavy labor and its associated risks, such as cardiovascular disease. The number of occupational injuries would surpass existing levels simply by virtue of the creation of new jobs at the site.

Table 24 shows how occupational hazards generated by the Edith Station will diminish workers' health.

Table 24. Summary of occupational safety health impacts

Indicator	Health Impact	Magnitude	Severity	Strength of Evidence
Unintentional Injuries	-	Major	High	***
Heart Attacks	-	Moderate	Moderate	***
Medical emergencies	-	Major	High	***

Explanations (Table adapted from Human Impact Partners, 2011):
Impact refers to whether the Edith Station will improve (+), harm (-), or not impact health effects (~).
Magnitude reflects a qualitative judgment of the size of the anticipated change in health effects (e.g., the increase in the number of cases of disease, injury, adverse events): Negligible, Minor, Moderate, Major.
Severity reflects the nature of the effect on the health effect and life expectancy and its permanence: High = severe, Mod. = moderate, Low = not severe.
Strength of causal evidence refers to the strength of the research showing causal relationship between a lack of occupational safety and possible health outcomes: * = plausible but insufficient evidence, ** = likely but more evidence is needed, *** = high degree of confidence in causal relationship. A causal effect means the effect is likely to occur, irrespective of the magnitude and severity.

Cumulative Impact and Environmental Justice – Protections for Minorities
Title VI of the Civil Rights Act of 1964 offers protection for minority populations against intentional and unintentional discrimination. Title VI of the Civil Rights Act applies to all recipients of federal financial assistance and precludes any agency from using methods of administration, which have the effect of subjecting individuals to discrimination because of their race, color, or national origin (40 CFR, Section 7.35(b)). Title VI also precludes any agency from deeming a site suitable or locating a facility where it will have discriminatory effects on the basis of race, color, or national origin (40 CFR Section, 7.35 (c)).

Cumulative Impacts
The EPA states that, "the combined, incremental effects of human activity, referred to as cumulative impacts, pose a serious threat to the environment. While they may be insignificant by themselves, cumulative impacts accumulate over time, from one or more sources, and can result in the degradation of important resources" (EPA, accessed online May, 2015).

For projects that are located on federal property or that use federal dollars, the assessment of cumulative impacts are required per the National Environmental Policy Act (CEQ, 1987). To assess cumulative impacts, the CEQ recommends its handbook entitled "Considering Cumulative Effects under the National Environmental Policy Act" (CEQ 1997).

New Mexico House Bill 458, which was introduced during the 2013 Regular Session of the New Mexico State Legislature, defines cumulative impacts as "the incremental environmental impacts of an individual project combined with the environmental impacts caused by past projects, the environmental impacts caused by other current projects and the environmental impacts caused by reasonably foreseeable future projects" (NM HB 458, accessed online at www. nmlegis, May, 2015). Cumulative impacts are operating in the impacted community and present a disproportionate environmental and health burden to the impacted community.

Environmental Justice
The EPA defines environmental justice as, "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies". It further defines "fair treatment" to mean, "no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies" (EPA, 2015, p.20).

The EPA states that "disproportionate public health and environmental effects may be related to a population's differential proximity and associated exposure to environmental stressors, often stemming from evolving mixed land use patterns (EPA, 2015, p. 19).

In order to address potential environmental injustice issues, the EPA recommends that "meaningful involvement" be promoted with communities that are potentially impacted. According to the EPA (2015) "meaningful involvement" means that:

1 People have an opportunity to participate in decisions about activities that may affect their environment and/or health.
2 The public's contribution can influence the regulatory agency's decision.
3 The public's concerns will be considered in the decision-making process.
4 The decision makers seek out and facilitate the involvement of those potentially affected.

The EPA suggests that the following questions be asked; "How did the public participation process provide transparency and meaningful participation for minority populations, low-income populations, tribes and indigenous people and how were disproportionate environmental and public health impacts on minority and low-income populations identified and addressed?" (EPA, 2015, p. 23).

In 1995, President Clinton signed Executive Order 12898, directing federal agencies to address disproportionately high and adverse human health or environmental effects on minority and low-income populations.

On November 18, 2005, Governor Richardson issued Environmental Justice Executive Order 2005-056 instructing New Mexico's state agencies to work together to address environmental justice and to form a multi-agency Environmental Justice Task Force to make recommendations regarding environmental justice in the state. Furthermore, this Executive Order included the need to address cumulative impacts, especially in low-income communities of color.

The New Mexico Environment Department and the COA's Environmental Health Department share the goal of protecting public health, safety and welfare of all residents of the State of New Mexico and of the City of Albuquerque. The City's Environmental Health Department has the mission to "responsively and professionally serve the people of Albuquerque by promoting and protecting public health, by preventing disease, and by preserving the integrity and quality of our environment through sustainable management and responsible stewardship" (accessed on-line at www.cabq.gov/environemtnalhealth, June, 2015).

Residents' and Businesses' Concerns About Environmental Injustice

1. Residents and businesses of the impacted community feel that they have not been afforded meaningful involvement in the decision-making process regarding the proposed Edith Station site selection.
2. Residents and businesses feel that they have not had a voice in the site selection process. They only found out about it when they read an Op Ed in the Albuquerque Journal announcing a solid waste rate increase for a WTS.
3. Residents feel that they are the dumping ground for the entire city.

4. Residents feel that they already experience the burden of more than their fair share of junk.
5. Residents feel as if they don't count because they are not a wealthy community.
6. Residents and businesses feel that the proposed Edith Station would contribute negatively to existing environmental, health and economic burdens.
7. Residents expressed concerns that the SWD management has not listened to community members' input at the COA's public meetings and other meetings.

The Association between Cumulative Impact, Environmental Justice and Health

As many have pointed out (Kaplan, 1996; Marmot, et al., 1987; Morello-Frosch, 1997), there is a clear association between socio-economic status and health outcomes, which holds true both at the individual and at the community level. The more affluent the community, the less it experiences both chronic and infectious diseases. There is also a relationship between the number of polluting industries, increases in economic and social uncertainty, increases in corresponding stress levels, and increases in chronic diseases (Gee and Payne-Sturges, 2004). The authors refer to this phenomenon as the exposure-disease paradigm, concluding that community stress promotes human vulnerability.

Current Cumulative Impacts, Environmental Justice, and Health in the Impacted Community

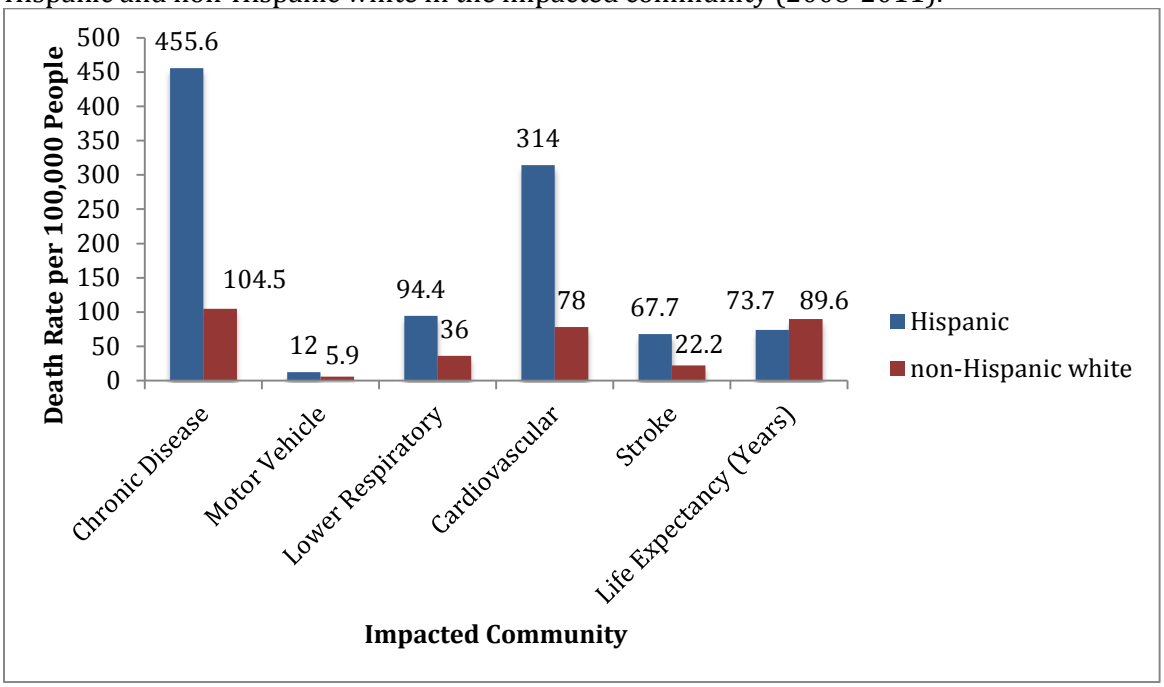
The impacted community is predominantly minority (64.6%) and low income, with 35.6% of families living below the federal poverty level. Partly because of residents' proximity to industrially zoned property (for example, the nearest residence to the proposed Edith Station is less than .03 miles), the impacted community is disproportionately affected by industrial operations. By EPA's definition, the impacted community is an environmental justice community because of its demographic and socio-economic characteristics and its proximity to polluting industries, which have resulted in greater health burdens among the minorities who live there.

Based on the disproportionate health burdens experienced by Hispanics in the impacted community, it appears that residents' immune systems may be compromised. The Joint Center for Political and Economic Studies also found disproportionate rates of death among Hispanics living in the impacted community, using life expectancy as an indicator. This finding was published in a report titled, "Place Matters for Health in Bernalillo County: Ensuring Opportunities for Good Health for All". This report shows areas of the impacted community as having the highest density of environmental hazards per square mile, lower life expectancies, and multi-generational poverty spanning over 5 decades when compared with other areas of Bernalillo County (2012). Bullard, among others, terms this environmental racism (Bullard, 1990).

Figure 30 below illustrates the disproportionate health burden for Hispanics when compared with non-Hispanic whites for the impacted community. Listed health outcomes are those associated with traffic, air quality, temperature, water quality,

flooding, noise, odors, litter, vectors, and occupational health – selected indicators for the Edith Station.

Figure 30. Ave. annual age-adjusted death rates per 100,000 persons and life expectancy by Hispanic and non-Hispanic white in the impacted community (2008-2011).



<u>Predicted Cumulative Impacts, Environmental Justice, and Health in the Impacted Community</u>

If the proposed Edith Station were to proceed at the current site, Hispanics of the impacted community would experience increases in chronic and infectious diseases, increases in stress levels and corresponding diseases, increases in environmental degradation, and decreases in overall well-being, quality of life, and social cohesion (Kawachi and Berkman, 2000).

Table 25 shows how increased cumulative impacts generated by the Edith Station and other neighborhood facilities will diminish the impacted community's health.

Table 25. Summary of cumulative exposures and health impacts

Indicator	Health Impact	Magnitude	Severity	Strength of Evidence
School and work absenteeism	-	major	high	**
Life expectancy at birth	-	major	high	**
Experiences of stress among adults and adolescents.	-	major	high	***

Explanations (Table adapted from Human Impact Partners, 2011):
Impact refers to whether the Edith Station will improve (+), harm (-), or not impact health effects (~).
Magnitude reflects a qualitative judgment of the size of the anticipated change in health effects (e.g., the increase in the number of cases of disease, injury, adverse events): Negligible, Minor, Moderate, Major.
Severity reflects the nature of the effect on the health effect and life expectancy and its permanence: High = severe, Mod. = moderate, Low = not severe.
Strength of causal evidence refers to the strength of the research showing causal relationship between cumulative impacts and the health outcome: * = plausible but insufficient evidence, ** = likely but more evidence is needed, *** = high degree of confidence in causal relationship. A causal effect means the effect is likely to occur, irrespective of the magnitude and severity.

Individual and Business Economic Wellbeing
Residents' and Businesses' Concerns

1. Saving the COA money at the expense of individual property and business owners is not a real savings.
2. Property values will plummet with the realization of the Edith Station. I am concerned about my property values decreasing. My home is my only insurance against a personal health catastrophe. I don't regard a humongous garbage transfer station a mile from my home to be a selling point.
3. How can having a WTS with all of its health and environmental issues do anything but decrease my property value?
4. We already have more than our fair share of junk in this community.
5. Please don't bring all the trash in Albuquerque to this neighborhood. It will decrease our property values.
6. The Edith Station is a land use that is incompatible with existing food distributors located nearby. Food distributors that may be impacted include SYSCO and the Rainbow Bakery.
7. The Edith Station would result in increased freight delivery times for freight distribution centers and businesses near the intersections of Montaño and Edith, on Comanche, and on Candelaria.
8. The Edith Station would result in increased employee health problems because of more dangerous driving conditions resulting in increased worker compensation claims.

Economic Wellbeing

<u>The Association between Economic Wellbeing and Health</u>

Wellbeing is considered to be a positive outcome that provides meaning to people when they perceive that their lives are going well. Wellbeing is shaped by good living conditions, adequate housing and employment opportunities, high quality relationships, and overall satisfaction with life. It is associated with a variety of health, job, family, and economically related benefits. Higher levels of wellbeing are associated with decreased risk of disease, illness, and injury, better immune functioning, faster recovery from illness, and increased longevity. Higher wellbeing is also associated with higher productivity at work, and greater contributions to communities. Environmental and social resources for health in a community can include peace, economic security, a stable ecosystem, and safe housing. Thus, central to wellness is a sense of economic security and economic wellbeing (Centers for Disease Control and Prevention, 2015).

Existing literature suggests that, for employers to attract high quality employees, they must offer a good quality of life by locating their businesses in neighborhoods where there are opportunities for quality education, upward economic mobility, and physical amenities such as libraries, safe streets that are enjoyable to walk, and parks (Salvesen, David & Renski, Henry, 2003). Land-use patterns are also known to affect the degree to which residents feel a sense of community and security. Land uses that do not encourage neighborhood interaction are often plagued by crime and a reduction in safety (Yen and Bhatia, 2002).

Current Economic Wellbeing and Health in the Impacted Community
The impacted community is currently a mix of residential, commercial and industrial land uses. Businesses include several food preparers and distributors, including SYSCO Foods and the Rainbow Bakery. Residents have been discouraged by the presence of so many polluting industries in their neighborhood and would like to see cleaner, locally owned businesses become part of the economic fabric of the neighborhood. The Edith Station is highly incompatible with this goal. At the same time, neighborhood businesses feel the Edith Station is incompatible with their efforts to transport materials in a timely and safe manner throughout the area.

Predicted Economic Wellbeing and Health in the Impacted Community
The proposed Edith Station is a departure from the desire of residents to attract clean industry and commercial development and it may discourage other businesses from locating in the neighborhood because of quality of life factors for future employees. It is also incompatible with food processing and distribution activities, having the potential to increase vectors and associated diseases.

Property Values
WTS's are not considered a benign land use; they are officially recognized as "noxious" (NEJAC, 2000; USEPA, 2002). The National Environmental Justice Advisory Council (NEJAC) suggests that the impact of WTSs on property values and the ability to attract and maintain appropriate businesses needs to be examined. Farber (1998) established that environmental risks pose economic risks to adjacent property values. There are both health risks and public image risks associated with WTSs. Lober and Green (1995) found that public opposition to solid waste sites in general diminished with more distance from the site. 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.

Eshet, et al (2007) conducted the most definitive study on property values and proximity to a WTS in Israel. The authors found statistically significant negative impacts on the value of residences extending up to 1.8 kilometers from the facility. Property values were reduced by 6.4% to 8.4% within one kilometer of the WTS and by 2.6% to 3.2% within two kilometers. Comparable studies in the United States have been conducted on landfills with similar results.

Most of these studies use hedonic pricing, which is a methodology that explains demand for a property by valuing each of its component characteristics, including proximity to a WTS. Ready (2005) found that all "high-level" (greater or equal to 500 tons of waste/day) landfills are associated with a12.9% 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%. Zeiss and Atwater (1989) claim that perceptible dis-amenities, such as a WTS, affect

housing values and suggest that "property-value guarantees" may be a way to compensate nearby property owners. Finally, Branden, Feng and Won (2011) in a meta-analysis on waste sites and property values concluded that all classes of waste sites affect real estate prices.

The Association between Property Related Wealth and Health

The loss of property related wealth is associated with increased property vacancy rates, which contribute to blighted neighborhoods, increased crime, and public and private disinvestment. Together, these factors contribute to stress-related diseases, such as heart disease and stroke (Frumkin, et al., 2004). These negative health impacts are particularly stark in communities having greater racial and income segregation (Kaplan, et al., 2009).

Current Property Values and Health in the Impacted Community

As already established in other sections of this HIA, Hispanic residents of the impacted community bear a disproportionate burden of death and disease. Further, census tracts within the impacted community have experienced over 5 decades of persistent poverty, defined as census tracts with a poverty rate of at least 20% for at least two consecutive census periods (this concept of persistent poverty is based on the U.S. Department of Agriculture's research on persistent poverty counties). Among Hispanics, the rate of cardiovascular deaths in the impacted community is 314.5 per 100,000 persons compared to 78 per 100,000 persons for non-Hispanic whites. Hispanic residents of the impacted community also experience a much higher death rate from strokes when compared with the impacted community's non-Hispanic white population (Figure 30).

Predicted Property Values and Health in the Impacted Communities

Based on the literature cited above, one can conclude that property values near the proposed Edith Station would decrease if the station proceeded, with property value decreases more pronounced closer to the Edith Station site. Several local realtors concur with this statement, stating that increases in traffic, noise, noxious odors, and the perception of degradation of the neighborhood would all contribute to decreases in property values near the proposed Edith Station (telephone conversations, May, 2015).

As community members already feel disengaged from the siting decision-making process and feel victimized by the potential environmental, health, and economic consequences of the proposed Edith Station, their stress-associated health outcomes would be further compromised.

Structural Integrity of Roadways and Historical Properties

The Association between Structural Integrity and Traffic Vibrations

Increases in heavy truck volumes deteriorate road conditions due to the immense weight of trucks when compared to other vehicles. Additionally, vibrations caused by heavy trucks can negatively impact the structural integrity of historical properties because vibration effects accelerate the process of deterioration initiated

by other causes, such as wet and cold weather, and nearby construction activities.

Current Structural Integrity of Roads and Historical Properties in the Impacted Community

Based on appearance, arterial roads surrounding the proposed Edith Station and in the impacted community have exceeded their lifecycle. Based on a letter provided by Michelle Ensey (2015), an archaeologist with the State of New Mexico's Department of Cultural Affairs, Historic Preservation Division, several historic properties are located nearby and one historic property is located within the site of the proposed Edith Station. Two properties listed on the State Register of Cultural Properties and the National Historic Register of Historic Places at Griegos Rd. and Edith Blvd., are: 1) SR #586 (the Juan Cristobal Armijo homestead) at 207 Griegos Rd., and 2) SR #939 (the Juan de Dios Chavez house) at 205 Griegos Rd. Additionally, the Alameda Lateral that crosses the western boundary of the site is eligible to be listed on the State and National Registers.

Predicted Structural Integrity of Roads and Historical Properties in Impacted Community

Unless preventive measures are introduced, increased traffic is likely to contribute to the deterioration of arterial roads. Deteriorated road conditions can contribute to increased collision rates for all vehicles. Further, truck traffic could also contribute to the deterioration of the two historical properties located close to the proposed Edith Station site. In direct conflict with the intent of the North Valley Area Plan and the Comprehensive Plan to revitalize communities within the *Established Urban Area* and *Central Urban Area* (the designation of the proposed Edith Station site), the Edith Station will contribute to the deterioration of two important historical properties and the possible impairment of the historical Alameda Lateral, which will in turn, detract from the historical and cultural identity of the community. Table 26 provides predicted health outcomes associated with the loss of economic wellbeing.

Table 26. Summary of loss of economic wellbeing and health impacts

Indicator	Health Impact	Magnitude	Severity	Strength of Evidence
Experiences of stress and depression among adults resulting in stress-related health outcomes such as cardiovascular disease and stroke.	-	Major	High	**
Vector-borne disease	-	Moderate	High	***
Disinvestment and loss of property values	-	Major	Mod.	**
Workers' compensation claims and insurance costs for businesses due to accidents.	-	Moderate	Mod.	**
Material shipment times.	-	Moderate	Mod.	**
Historical and cultural neighborhood identity	-	Major	Mod.	***
Quality of life	-	Major	Mod.	***
Motor vehicle related collision rates	-	Moderate	High	***

Explanations (Table adapted from Human Impact Partners, 2011):
Impact refers to whether the Edith Station will improve (+), harm (-), or not impact health effects (~).
Magnitude reflects a qualitative judgment of the size of the anticipated change in health effects (e.g., the increase in the number of cases of disease, injury, adverse events): Negligible, Minor, Moderate, Major.
Severity reflects the nature of the effect on the health effect and life expectancy and its permanence: High = severe, Mod. = moderate, Low = not severe.
Strength of causal evidence refers to the strength of the research showing causal relationship between loss of economic wellbeing and the health outcome: * = plausible but insufficient evidence, ** = likely but more evidence is needed, *** = high degree of confidence in causal relationship. A causal effect means the effect is likely to occur, irrespective of the magnitude and severity.

Recommendations
The proposed Edith Station should be denied because there is no degree of mitigation that can sufficiently address the impacts listed below:

Traffic

1. Added heavy truck and vehicle traffic on Comanche and Edith generated by the Edith Station will negatively impact multi-modal accessibility affecting the biking and pedestrian communities, as well as the general community.
2. Comanche is a designated bike facility; therefore it must be safe for bicyclists to travel. From the perspective of bicyclists and pedestrians, heavy truck traffic is the worst kind of traffic because of the collision severity.
3. Unsafe multi-modal accessibility caused from traffic generated by the Edith Station is in direct conflict with the recently adopted Complete Streets Ordinance.
4. Unsafe multi-modal accessibility will negatively impact access to the nearby Rail Runner Station on Montano.
5. It is likely that necessary arterial and Comanche/Griegos I-25 on-/off-ramp improvements will not occur because of cost and space constraints.
6. The Edith Station's proposed household hazardous waste drop-off center will increase the impacted community's risk for hazardous waste exposure because of increased hazardous waste shipments through the community, a decrease in road safety, and a predicted increase in heavy truck and vehicle collisions based on increased volumes.
7. Increased danger from traffic generated by the Edith Station to existing truck traffic as trucks travel north on I-25, exit off Comanche heading west, and head back onto I-25 south to access facilities via Candelaria.
8. Increased danger from Edith Station generated traffic for vehicles travelling through the Big-I, on I-25, and on I-40.
9. Increased danger from Edith Station generated traffic to vulnerable populations, such as the elderly, children, low-income, and minorities.

Air Quality

1. The COA lacks the funding to retrofit the diesel heavy truck fleet to natural gas; therefore, residents of and workers in the impacted community will be affected by the increase in diesel emissions.
2. The COA does not have a plan to reduce idling of their truck fleet.
3. The COA's proposed siting of the Edith Station demonstrates a lack of consideration of the disproportionate air pollution impacts to Hispanic residents of the impacted community when compared with other areas of Bernalillo County.
4. The COA's proposed siting of the Edith Station demonstrates a lack of consideration given to smaller WTSs, which would decrease the concentration of air pollutants in the low-lying valley neighborhoods near the proposed site.

5. The COA's proposed siting of the Edith Station demonstrates a lack of consideration to an alternative WTS located further from population centers and outside of an already burdened low-income, minority community.

Climate Change, Water Quality and Flooding

1. Absence of natural shading by deciduous trees to reduce health island effects.
2. Lack of shading structures comprised of high albedo materials.
3. Absence of ground water monitoring system to monitor current SWD and future Edith Station impacts to underlying ground water.
4. Lack of commitment to sewer infrastructure improvements to improve the infrastructure's capacity to handle increased wastewater discharges into the sewer system.
5. Inappropriate site grading, contributing to water flows from the east to the west of the property and to down-gradient adjacent properties.
6. Lack of enough storm water drains along Comanche to prevent flooding of Comanche and other nearby arterial roads during heavy rains.
7. Incorrect placement of surface water runoff ponds, as witnessed by residents who have received storm water runoff from the SWD site during high rainfall events.
8. Lack of management practices, such as added vegetation and soil permeability, to capture and treat surface water runoff before going into the storm water system.
9. Historical evidence of a lack of cleanup of litter and illegally dumped waste occurring near the recycling containers that can contribute to surface water and ground water contamination.
10. Evidence of COA's lack of compliance with federal water discharge permits.
11. Increased likelihood of the down-gradient Alameda lateral overflowing or becoming contaminated due to increased surface water runoff and debris from the proposed Edith Station during high rainfall events.

Noise

1. Recent noise monitoring revealed noise levels that exceeded the COA noise standards in the industrial and residential areas surrounding the SWD. Existing noise levels will increase with increased heavy truck and vehicle traffic, as well as with Edith Station operations.
2. Increased noise levels will likely contribute to learning impairment of students attending the school closest to the proposed Edith Station, La Luz Elementary, a school with a rating of D. Children are at the greatest risk of increased noise levels because of their less well-developed immune, cardiovascular, and neurological systems.
3. Chronic high noise levels will increase the stress levels and associated stress related health outcomes of those working or living near the proposed Edith Station site. The closest residences are less than .03 miles from the site.
4. Thus far, there has been no information regarding COA's plans for noise mitigation should the Edith Station proceed.

Nuisance

1. Communities that live next to WTSs in other parts of the country experience harmful odors.
2. Scientific evidence indicates that odors can be harmful to human health, specifically as they are associated with allergies and respiratory tract problems.
3. Chemical substances used to control odors can themselves pose risks to health.
4. Residents of the impacted community already complain of odors related to industrial operations in these neighborhoods.
5. WTSs can generate stray waste that can become litter, which is known to attract rodents, insects, and other pests that may introduce infectious diseases into a community.
6. Individuals and businesses that find themselves adjacent to the existing SWD facility have long complained of litter that has piled up along fences, and against buildings, vehicles and other barriers, and of other vectors, such as birds and rodents.
7. The numbers of cases of West Nile Virus are higher in the impacted community and indicate that individuals living close to the Rio Grande (including the neighborhoods near the proposed Edith Station) are at a greater risk of being exposed to mosquitoes carrying this virus.

Occupational Health

1. Occupations involved in the processing of refuse and recyclable material are known to be the fifth most dangerous industrial occupation in the U.S., with death rates averaging 30 per 100,000 persons. Thus, WTSs impose a number of physical, chemical, and other occupational hazards to workers in these facilities.
2. The impacted community is disproportionately affected by high death rates attributed to unintentional injuries.
3. The COA Plan must explicitly address how occupation safety risks will be minimized. This is particularly important in light of the current lack of occupational health protections at the SWD facility. While conducting noise monitoring activities, NV HIA Committee members witnessed that many garbage truck drivers failed to wear earplugs to protect against hearing loss, a basic occupational safety requirement.
4. Assuming that jobs associated with the Edith Station are prioritized for residents of the impacted community, the impacted community will be burdened by more deaths attributed to unintentional injuries and cardiovascular disease. This is particularly relevant for Hispanic residents.
5. Residents would rather work in high quality jobs that provide a living wage, pose fewer occupational dangers, and do not involve handling garbage.

Cumulative Impacts and Environmental Justice

1. The COA did not include the impacted community in the site selection process or in the development of criteria used by the COA for site selection.

2. As demonstrated throughout the HIA, based on health outcome data provided by the New Mexico Department of Health, Hispanics of the impacted community experience higher age-adjusted death rates for many different types of disease when compared to non-Hispanic whites in the impacted community and to Hispanics and non-Hispanic whites in Bernalillo County.
3. The proposed Edith Station will result in greater health burdens for the impacted community. Deaths in the impacted community will disproportionately impact the most vulnerable, including the elderly, children, and minority and low-income populations.
4. The proposed Edith Station operations will adversely impact those who live closest to the facility. The nearest residents (a cluster of apartments located on the northeast corner of Rankin Rd. and Edith Blvd.) live less than .03 miles from the site.
5. Siting the proposed Edith Station at the selected site violates the requirements of Enactment 270-1980, stating that zone changes to special use cannot adversely impact the health, safety and welfare of the adjacent community.
6. Siting the proposed Edith Station at the selected site has the potential to violate Title VI of the Civil Rights Act as follows, "Title VI of the Civil Rights Act of 1964, which apply to all recipients of federal financial assistance, preclude any agency from using methods of administration, which have the effect of subjecting individuals to discrimination because of their race, color, or national origin." 40 CFR, Section 7.35(b). "Title VI also precludes any agency from deeming a site suitable or locating a facility where it will have discriminatory effects on the basis of race, color, or national origin." 40 CFR, Section 7.35 (c).

Individual and Business Economic Wellbeing

1. A decline in property values is likely to occur.
2. The proposed use for a WTS is in direct conflict with goals outlined in Comprehensive Plan and the North Valley Area Plan "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." (Comprehensive Plan, B. Central Urban Area, Land Use, Section 6).
3. The COA has not provided a plan to reroute and restrict heavy truck traffic away from historical properties in the impacted community.
4. The COA has a lack of resources to repave and address surface irregularities of arterial roads and freeway on/off-ramps that are likely to become impaired due to the weight of heavy trucks.
5. The COA has a lack of resources to provide trenching, or other preventive measures, between vibration sources and historical properties.
6. The COA has not provided provisions to prevent negative impacts to the historical Alameda Lateral as a consequence of a more intensive land-use on the current SWD site.

7. The COA does not consider the effects of increased traffic on the freight transportation activities of established businesses in the neighborhood.
8. The COA does not consider the basic incompatibility between the proposed Edith Station and existing food processing and distribution centers in the impacted community.
9. The COA does not consider the Edith Station's impacts to increased insurance costs due to a greater number of worker's compensation claims because of increased motor vehicle accidents.

Monitoring and Evaluation

Along with the health professionals, members of the NV HIA Committee and the NV Coalition will evaluate the HIA process to assess the development of HIA skills among community members and to evaluate the strengths and weaknesses of the HIA process that was used. They will also monitor the health determinants (traffic, air quality, climate change, water quality, flooding, noise, nuisances, occupational health, cumulative impacts and economic wellbeing), along with the associated health outcomes, based on the health data provided in this report.

Also to be monitored is how the HIA will influence the decision-making process and the pending decision on the development of the proposed WTS at the site that was selected by the COA.

Conclusions

The HIA resulted in a clearer understanding of the potential health effects of the Edith Station, should it proceed. Additionally, the HIA provided residents with baseline data on the existing health status for their neighborhood and highlighted the existing disparities in health occurring among Hispanics in the impacted community.

This HIA is a robust document because it not only incorporates information from existing data sources and peer-reviewed literature, but also includes the invaluable knowledge of community members who experience day-to-day life in the impacted community – knowledge that cannot be found in a journal article. Together, this information provides a more complete picture of the potential health effects to the impacted community should the Edith Station proceed.

Additionally, by conducting the HIA together through a collaborative partnership, community members increased their capacity and resources to evaluate land-use decisions that directly affect them and they now have the capacity to provide decision makers with scientifically-based evidence to enable them to make sound decisions that promote the health of their community. It is in the best interest of the COA to promote equal opportunities for health by ensuring health protections to populations considered the most vulnerable. These populations include children, the disabled, the elderly, the poor, and minorities.

This HIA is unique because it considers the health impacts of WTSs in general, and in particular; it considers the health effects of the Edith Station on a low-income, minority community that is located in one of the most historical areas of the Albuquerque metropolitan area; an area that community residents feel should be revitalized rather than the home to Albuquerque's waste.

The HIA provides policy-makers with the information they need to consider the health effects of the proposed Edith Station in order to make a sound land-use decision that will benefit nearby communities as well as all of Albuquerque.

References Cited

Acevedo-Garcia, D., Osypuk, T., McArdle, N., & Williams, D. (2008). Toward a policy-relevant analysis of geographic and racial/ethnic disparities in child health. *Health Affairs (Project Hope)*, *27*(2), 321–333. http://doi.org/10.1377/hlthaff.27.2.321

Albuquerque Journal. (May 29, 2014). "Trash collection bills to increase July 1." Available at: http://www.abqjournal.com/407587/news/trash-collection-fees-to-increase-july-1.html.

Albuquerque Public Schools. (2015). School Ratings. Accessed on line at: www.aps.edu/schools/adequate-yearly-progress-ayp.15 May, 2015.

American Lung Association. (2014a). American Lung Association State of the Air 2013 - Particle Pollution. Accessed at: http://www.stateoftheair.org/2013/health-risks/health-risks-particle.html

American Lung Association. (2014b). State of the Air 2014. American Lung Association. Accessed at: http://www.lung.org/about-us/our-impact/top-stories/state-of-the-air-2014-top-story.html

Anstine, J. (2003). Property values in a low-populated area where dual noxious facilities are present. Growth Change. 34: 345-358.

Babisch, W., Fromme, H., Beyer, A., Ising, H. (2001). Increased catecholoamine levels in urine in subjects exposed to road traffic noise: The stress hormone in noise research. *Environment International.* 26, 475–481

Bailey, L. (2007). "Public transportation and petroleum savings in the US: reducing dependence on oil." Available at: www.publictransportation.org/reports/documents/ apta_public_transportation_fuel_savings_final_010807.pdf.

Baldwin, C., Bell, I., & O'Rourke, M. (1999). Odor sensitivity and respiratory complaint profiles in a community-based sample with asthma, hay fever, and chemical odor intolerance. *Toxicology and Health*, 15, 403–409.

BBC Research and Consulting. (2012). Potential impact of proposed waste transfer station near Carbondale. Accessed at: www.bbcresearch.com.

Beard, J., Beck, C., Graham, R., Packham, S., Traphagan, M., Giles, R., & Morgan, J. (2012). Winter temperature inversions and emergency department visits for asthma in Salt Lake County, Utah, 2003-2008. *Environmental Health Perspectives*, *120*(10), 1385–1390. http://doi.org/10.1289/ehp.1104349

Berglund, B., Lindvall, T., Schwela, D., Goh, K. (1999). "World Health Organization: Guidelines for Community Noise". World Health Organization.

Berglund, B., Lindvall, T., Schwela, D. (1999). WHO Guidelines for Community Noise. Available at: http://whqlibdoc.who.int/hq/1999/a68672.

Berkman, L., Kawachi, I. (eds) (2000). Social epidemiology. New York: Oxford University Press.

Binder, S. (1989). "Deaths, injuries, and evacuations from acute hazardous naterials releases." *American Journal of Public Health*, 79(8): 1042-1044.

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

Brunner, E. (1997). "Stress and the biology of inequality." *BMJ*, 314(7092); Boulder, CO: Westview.

Bureau of Labor Statistics, U.S. Department of Labor. (2014). National Census of Fatal Occupation Injuries in 2013 (Preliminary Results). U.S. Department of Labor. Accessed at: http://www.bls.gov/news.release/pdf/cfoi.pdf

Carpio, A. (2015). County told to investigate school district complaints about Rainbow waste facility - HB Independent. *Huntington Beach Independent*. Huntington Beach, California. Accessed at: http://www.hbindependent.com/news/tn-hbi-me-0212-rainbow-decision-20150205,0,4567946.story.

CDC (Centers for Disease Control and Prevention). (2015). Health-Related Quality of Life (HRQOL): Well-being Concepts. Centers for Disease Control and Prevention. Accessed at: http://www.cdc.gov/hrqol/wellbeing.htm

CDC (Centers for Disease Control and Prevention). (2011b)."Motor Vehicle Safety". Centers for Disease Control and Prevention. Available at: http://www.cdc.gov/motorvehiclesafety/.

City of Albuquerque, Environmental Health Department. Available at: www.cabq.gov/environmental health.

City of Albuquerque. (2011). Feasibility Study for a Waste Transfer Station. J.R. Miller & Associates.

City of Albuquerque. (1980). Resolution 270-1980: Policies for Zone Change Applications. Approved 12-30-1980.

City of Albuquerque (2002). Zoning Code. Appendix B. Enactment 270-1980. Revised October.

City of Albuquerque. (2014). Addendum Albuquerque Transfer Station Feasibility Analysis by D. Drenner for J. R. Miller & Associates.

COA and Bernalillo County. Amended (2003). "Albuquerque Bernalillo County Comprehensive Plan."

COA (City of Albuquerque). (January 2015). "Sponsored Public Meeting on Proposed Edith Station."

COA (City of Albuquerque). (2002). "Integrated Waste Management Plan."

COA (City of Albuquerque). (May 19, 2014). "City Council Meeting."

COA (City of Albuquerque). (1993). "North Valley Area Plan."

COA (City of Albuquerque). (2015). "Complete Streets Ordinance, Council Number C/S 0-14-32."

Clean Air Task Force. (2005). Diesel and Health in America: The Lingering Threat. Clean Air Task Force, Boston, MA.

Clougherty, J., Kubzansky, L. (2009). A Framework for Examining Social Stress and Susceptibility to Air Pollution in Respiratory Health. *Environmental Health Perspectives*, *117*(9), 1351–1358. http://doi.org/10.1289/ehp.0900612

Cordero, L., Malakar, N., Wu, Y., Gross, B., Moshary, F. (2013). Assessing Surface PM2.5 Estimates Using Data Fusion of Active and Passive Remote Sensing Methods. *British Journal of Environment & Climate Change*, *3*(4), 547–565.

Cottriill, C., and Piyushimita, T. (2010). "Evaluating Pedestrian Crashes in Areas with Low-Income or Minority Populations." *Accid. Anal. Prev*, 43:11-24.

Department of Health and Human Services. (2013). Healthy People 2020. Hearing and Other Sensory or Communication Disorders. Accessed at: http://www.healthypeople.gov/2020/topicsobjectives2020/overview.aspx?topicid=20.

Egerter, S., Braveman, P., Barclay, C. (2011). "How Social Factors Shape Health: The Role of Stress." The Robert Wood Johnson Foundation. Available at: http://www.rwjf.org/vulnerablepopulations/product.jsp?id=72468.

Ensey, M. Personal communication with Kitty Richards dated June 5, 2015. New Mexico Department of Cultural Affairs, Historic Preservation Division.

Environmental Protection Agency. (2010). National Environmental Justice Advisory Council.

Environmental Protection Agency. (2004). Air quality criteria for particulate matter. EPA/600/P-99/002aF-bF. Environmental Protection Agency.

Environmental Protection Agency. (2015). Guidance on Considering Environmental Justice During the Development of Regulatory Actions.

Environ Strategy Consultants, Inc. (2004). Phase I Environmental Site Assessment. Rainbow Disposal Co., Inc. 17121 Nichols Street Huntington Beach, California.

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

Evans, L., Frick, M. (1992). "Car Size or Car Mass: Which Has Greater Influence on Fatality Risk?" *American Journal of Public Health*, 82(8):1105-1112.

Evans, Lercher, Meis, Ising, Kofler. (2001). Community noise exposure and stress in children. Acoustical Society of America.

Ewing, R., Kreutzer, R. (2006). "Understanding the Relationship between Public Health and the Built Environment." A Report Prepared for the LEED-ND Core Committee. Available at: http://www.usgbc.org/ShowFile.aspx?DocumentID=3901.

Faber, S. (1998). Undesirable facilities and property values: a summary of empirical studies. *Ecological Economics*. (24), 1-14.

Faber, D., Krieg, E. (2002). Unequal exposure to ecological hazards: environmental injustices in the Commonwealth of Massachusetts. *Environmental Health Perspectives*, *110*(Suppl 2), 277–288.

FHWA (Federal Highway Administration). (2011). "Safety Facts & Statistics." Available at: http://safety.fhwa.dot.gov/facts_stats/.

Frank, L., Andresen, M., Schmidt, T. (2004). "Obesity Relationships with Community Design, Physical Activity, and Time Spent in Cars." *American Journal of Preventive Medicine* 27(2): 87–96.

Frumkin, H., Frank, L., Jackson, R. (2004). *Urban sprawl and Public Health: Designing and Planning for Health Communities*. Washington, DC. Island Press.

Gee, C., Payne-Sturges, D. (2004). Environmental health disparities: a framework integrating psychosocial and environmental concepts. *Environmental Health Perspectives*. 112(17):1645-1653.

Gordon Environmental Inc. National Transfer Station/Recycling Experience. Accessed at: http://www.gordonenvironmental.com/transferstations.htm.

Green, B. (November 12, 2014). "Personal email communication to B. Gatwood regarding visitations to Eagle Rock and Montessa Park Convenience Centers."

Hammer, M., Swinburn, T., Neitzel, R. (2014). Environmental Noise Pollution in the United States: Developing an Effective Public Health Response. *Environmental Health Perspectives*.

Human Impact Partners. (2011). "The Gateway Cities Air Quality Action Plan I-170 Corridor Project Health Impact Assessment."

Jackson, R., Kochtitzky. (2001). "Creating a Healthy Environment." Accessed at: http://www.sprawlwatch.org.

Jacob, D., Winner, D. (2009). Effects of climate change on air quality. *Atmospheric Environment.* 43(1):51–63.

Joint Center for Political and Economic Studies. (2012). Place Matters For Health in Bernalillo County: Ensuring Opportunities for Good Health for All. A Report on Health Inequities in Bernalillo County, New Mexico. Joint Center for Political and Economic Studies. Accessed at: http://jointcenter.org/docs/JCtextBernalillo.pdf

Kaplan, D., Sommers, G. (2009). "An Analysis of the Relationship between Housing Foreclosure, Lending Practices, and Neighborhood Ecology: Evidence from a Distressed County." *The Professional Geographer*. 61(1).

Kaplan, R., Norton, D. (1996). The balanced scorecard: Translating strategy into action. Watertown, MA: Harvard Business Press.

Kim, J., Ulfarsson, G., Shankar, V., Mannering, F. (2010). "A Note on Modeling Pedestrian-Injury Severity in Motor-Vehicle Crashes with the Mixed Logit Model." *Accid Anal Prev*. 42(6): 1751-1758.

LaScala, E., Gruenewald, P., Johnson, F. (2004). "An Ecological Study of the Locations of Schools and Child Pedestrian Injury Collisions." *Accid. Anal. Prev*. 36:569-576.

Levine, N., Kim, K., Nitz, L. (1995). "Spatial Analysis of Honolulu Motor Vehicle Crashes: I. Spatial Patterns." *Acid. Anal. Prev,* 27(5):663.

Li, F., Fisher, K., Brownson, R., Bosworth, M. (2005). "Multilevel modeling of built environment characteristics related to neighborhood walking activity in older adults." *Journal of Epidemiology Community Health*, 59(7):558–64.

Litman, T. (2004). "Economic Value of Walkability." Victoria Transportation Policy Institute. Available at: http://www.vtpi.org/walkability.pdf.

Logan, J. (1989). Ozone in rural areas of the united states. *Journal of Geophysical Researc.h* 94(D6):8511–8532.

Luna, J. (personal e-mail to K. Richards, 2/2015) Mid Rio Grande Council of Governments.

Mandal, Ananya. (2014). What are Health Disparities? Accessed at: http://www.news-medical.net/health/Health-Disparities-What-are-Health-Disparities.aspx

Marmot, M., Kogevinas, M., Elston M. (1987) Social/economic status and disease. *Annual Review of Public Health*. 8:111–135.

Marmot, M., Allen, J. (2014). Social Determinants of Health Equity. *American Journal of Public Health*, *104*(S4), S517–S519. http://doi.org/10.2105/AJPH.2014.302200

Morello-Frosch, R., & Jesdale, B. (2006). Separate and Unequal: Residential Segregation and Estimated Cancer Risks Associated with Ambient Air Toxics in U.S. Metropolitan Areas. *Environmental Health Perspectives*, *114*(3), 386–393. http://doi.org/10.1289/ehp.8500

MRCOG (Mid-Region Council of Governments). (2011). "Safety Doesn't Happen by Accident. General Crash Data and Trends, 2002-2011 for the Albuquerque Metropolitan Planning Area.

MRCOG (Mid-Region Council of Governments). "(2012) PM Peak Hour Congestion PM Peak Hour Volume to Capacity, Comanche/Griegos I-25 Interchange." Data provided by J. Luna to K. Richards, February 2015.

MIG (Moore Iacofano Goltsman, Inc.) and ICF International. (2009). "Healthy Communities an Healthy Economies: A Toolkit for Goods Movement." Prepared for the California State Department of Transportation, Los Angeles County Metropolitan Transportation Authority, Riverside County Transportation Commission, and San Bernardino Associated Governments. Available at: http://www.metro.net/projects_studies/mcgmap/images/6-guidebook-chapter6_final.pdf.

Miller, J. (2000). The effects of race/ethnicity and income on early childhood asthma prevalence and health care use. *Am. Journal of Public Health*.90:428-430

Morello-Frosch, R. (2002). Discrimination and political economy of environmental inequality. Environment and Planning C: *Government and Policy*. 20;477-496.

Moudon, A., Cook, Ulmer, J. Hurvitz, P., Drewnowski, A. (2011). "A neighborhood wealth metric for use in health studies." *American Journal of Preventive Medicine* 41(1): 88-97.

National Environmental Justice Advisory Council, Waste and Facility Siting Subcommittee, & Waste Transfer Station Working Group. (2000). "A Regulatory Strategy for Siting and Operating Waste Transfer Stations: A Response to Recurring Environmental Justice Circumstance: The Siting of Waste Transfer Stations in Low-Income Communities and Communities of Color". Environmental Protection Agency - EPA Report 500-R-00-001.

National Highway Traffic Safety Administration. (2011). FARS Data Tables: National Statistics. Available at: http://www-fars.nhtsa.dot.gov/Main/index.aspx.

National Research Council. (2011). "Improving Health in the United States: The Role of Health Impact Assessment."

New Hampshire Department of Environmental Services. (2012). Environmental Fact Sheet. Odors and Your Health (ARD-EHP-24).

Newman, L. (2015). Irritant Gas Inhalation Injury. Accessed at: http://www.merckmanuals.com/professional/pulmonary-disorders/environmental-pulmonary-diseases/irritant-gas-inhalation-injury

New Mexico Department of Health. (2015). Hantavirus Pulmonary Syndrome. Accessed at: http://nmhealth.org/about/erd/ideb/zdp/hps/

New Mexico House Bill 458. Accessed on-line 5/25/15.

New Mexico Indicator-Based Information System. (2012). New Mexico Indicator-Based Information System. New Mexico Department of Health. Accessed at: https://ibis.health.state.nm.us/query/builder/hidd/HIDD/Count.html

NMDOH (New Mexico Department of Health). (2013). Behavioral Risk Factor Surveillance System. "Adult participation in physical activities during the past month, age adjusted data, by Hispanic and non-Hispanic white."

NMDOH (New Mexico Department of Health). (2012). Indicator Based Information System. "Age- adjusted chronic disease death rate per 100,000 persons, Bernalillo County and impacted community for non-Hispanic white and Hispanic, 2008-2011."

NMDOH (New Mexico Department of Health). (2012). Indicator Based Information System. "Life Expectancy from birth, Bernalillo County and impacted community for non-Hispanic white and Hispanic, 2011",

NMDOH (New Mexico Department of Health). (2012). Indicator Based Information System. "Age- adjusted motor vehicle related death rate per 100,000 persons, Bernalillo County and impacted community for non-Hispanic white and Hispanic, 2008-2011."

NMDOH (New Mexico Department of Health). (2011). Youth Risk and Resiliency Survey. "Statistics on feelings of sadness and hopelessness among Bernalillo County High School Students by Hispanic and Non-Hispanic White Students."

North American HIA Practice Standards Working Group (Bhatia, R., Branscomb, Farhang, L., Lee, Orenstein, M., Richardson, M.). (2010). "Minimum Elements and Practice Standards for Health Impact Assessment, Version 2." North American HIA Practice Standards Working Group. Oakland, CA: November 2010.

Ohio Bureau of Environmental Health. (2015). Odors and your Health Answers to Frequently Asked Health Questions. Health Assessment Section.

Peel, J., et al. (2005). Ambient Air Pollution and Respiratory Emergency Department Visits. *Epidemiology*. *16*, 164–174.

PolicyLink. (2002). "Regional development and physical activity: issues and strategies for promoting health equity." Available at: http://www.policylink.org/Research/PhysicalActivity/.

Rakha H., Flintsch, A., Ahn, K., El-Shawarby, I., Arafeh, M. (2005). "Evaluating alternative truck management strategies along Interstate 81." Transportation Research Record: *Journal of the Transportation Research Board*. 1925:76-86.

Ready, R. (2005). Do landfills always depress nearby property values? Rural Development Paper No 27. The Northeast Regional Center for rural Development. Pennsylvania State University.

Retting, R., Teoh, E. (2008). "Traffic Speeds on Interstates and Freeways 10 Years after Repeal of National Maximum Speed Limit." *Traffic Injury Prevention*, 9(2):119-124.

Reynolds, C., et al. (2009). "The Impact of Transportation Infrastructure on Bicycling Injuries and Crashes: A Review of the Literature." *Environmental Health*. 8(1): 1-19.

Reynolds, M. (2013). Nauseating Scene at SoCal Elementary School. *Courthouse News Service*. Accessed at: http://www.courthousenews.com/2013/12/16/63760.htm

Rainer, J. (1982). "Effect of Vibrations on Historic Buildings: An Overview." *Bulletin of the Association for Preservation Technology.* 14(1):2-10.

Richards, K., Suozzi, K. (2011). Health Impact Assessment on NMRT's Request for a Special Use Permit. Prepared for the Bernalillo County Planning Commission April 6, 2011 Hearing. Bernalillo County Place Matters Team.

Rivara, F., Thompson, D., Thompson, R. (1997). "Epidemiology of Bicycle Injuries and Risk Factors for Serious Injury." *Injury Prevention*, 3:110-114.

Roberts, I., Marshall, R., Lee-Joe, T. (1995). "The Urban Traffic Environment and the Risk of Child Pedestrian Injury: A Case-Crossover Approach." *Epidemiology*. 6:169-171.

Salvesen, D., Renski, H. (2003). The Importance of Quality of Life in the Location Decisions of New Economy Firms. Center for Urban and Regional Studies, University of North Carolina at Chapel Hill. Accessed at: https://curs.unc.edu/files/2013/04/neweconomyreport.pdf

Schiffman, S., Williams, C. (2005). Science of odor as a potential health issue. *Journal of Environmental Quality*. *34*(1), 129.138.

Simpson M, Bruce R. (1981). Noise in America: Extent of the Noise Problem. (Report 550/9-81-101). Washington, DC: United States Environmental Protection Agency.

Sustainable Systems Research, LLC. (2015). Review of the Traffic Impacts From the Proposed Waste Transfer Station in Albuquerque, New Mexico.

Sutton, I. (2014). Incorporating Health and Safety Considerations into Transfer Station Design| Recycling Publication | Waste News. Accessed at: http://wasteadvantagemag.com/incorporating-health-and-safety-considerations-into-transfer-station-design/

Task Force on Community Preventive Services. (2001). "Increasing physical activity: a report on recommendations of the Task Force on Community Preventive Services." *MMWR*. 50(RR-18):1-14.

Transport Canada. (2001). *Transport Action*.

Trenga, C., et al. (2006). Effect of Particulate Air Pollution on Lung Function in Adult and Pediatric Subjects in a Seattle Panel Study. *Chest*. *129*:1614–1622.

U.S. Census Bureau, 2013 American Community Survey 5-Year Estimates. Selected Housing Characteristics. Accessed at: http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_13_5YR_DP04&prodType=table.

United States Environmental Protection Agency. (1974). Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. Accessed at: http://www.nonoise.org/library/levels74/levels74.htm.

U.S. Environmental Protection Agency. (1998). Illegal Dumping Prevention Guidebook. Document EPA-905-B-97-001. U.S. Environmental Protection Agency. US EPA Region 5. Waste, Pesticides, and Toxics Division.

United States Environmental Protection Agency. (2001). Waste Transfer Stations: Involved Citizens Make the Difference. United States Environmental Protection Agency, Solid Waste and Emergency Response.

USEPA (U.S. Environmental Protection Agency). (2015). "Definition of Waste Transfer Station". Accessed at: http://www.epa.gov/solidwaste/nonhaz/municipal/transfer.htm.

USEPA (U.S. Environmental Protection Agency). (2000). "A Regulatory Strategy for Siting and Operating Waste Transfer Stations: A Response to a Recurring Environmental Circumstance: The Siting of Waste Transfer Stations in Low Income Communities of Color."

USEPA (U.S. Environmental Protection Agency). (2000). "Hazardous Waste in Your Community."

USEPA (U.S. Environmental Protection Agency). (2002). "Waste Transfer Stations: A Manual for Decision-Making."

Van Kempen, E., Kruize, H., Boshuizen, H., Amerling, C, Staatsen, B. Hollander AE. (2002). The association between noise exposure and blood pressure and ischemic heart disease: a meta-analysis. *Environmental Health Perspectives.* 110(3): 307–317.

Van Kempen, E, Davies H. (2013) Noise and health in vulnerable groups: A review. In *Noise and Health* (15):153-159. University of British Columbia, School of Population and Public Health, Vancouver, Canada.

Wener, R., Evans, G., Lutin, J. (2006). "Leave the driving to them: comparing stress of car and train commuters." American Public Transportation Association.

Werner, M. President of North Valley Little League. Personal telephone communications with Jen Parker. 5/17/15, 5/19/15.

Wikipedia. (2015, June 1). Inversion (meteorology). In *Wikipedia, the free encyclopedia*. Wikipedia. Accessed at: http://en.wikipedia.org/w/index.php?title=Inversion_(meteorology)&oldid=664964107

World Health Organization, (1999). *Guidelines for community noise.* Geneva. Accessed at:http://www.who.int/docstore/peh/noise/guidelines2.html.

World Health Organization. (2013). Health Effects of Particulate Matter. Policy implications for countries in eastern Europe, Caucasus and central Asia. World Health Organization Regional Office for Europe. World Health Organization. Accessed at: http://www.euro.who.int/data/assets/pdf_file/0006/189051/Health-effects-of-particulate-matter-final-Eng.pdf

World Health Organization. (2014a). 7 Million Premature Deaths Annually Linked to Air Pollution. World Health Organization. Accessed at: http://www.who.int/mediacentre/news/releases/2014/air-pollution/en/

World Health Organization. (2014b). Children's Environmental Health: Air Pollution. World Health Organization. Accessed at: http://www.who.int/ceh/risks/cehair/en/

WHO (World Health Organization). (2011). "Air Quality and Health." Accessed at: http://www.who.int/mediacentre/factsheets/fs313/en/index.html.

Yen, I., Bhatia, R. (2002). How Increasing the Minimum Wage Might Affect the Health Status of San Francisco Residents: A Discussion of the Links Between Income and Health. Working Paper.

Zak, A. (2013). H.B. school district accuses waste hauler of health hazards. The Orange County Register. *Orange County Register*. Huntington Beach, California. Accessed at: http://www.ocregister.com/articles/rainbow-593665-district-company.html

Zeiss, C. (1997). Cause and effect patterns of noxious facility impacts on property values. *Journal of Environmental Systems*. 111-136.

Zeiss, C., Atwater, J. (1989). Waste facility impacts on residential property values. *Journal of Urban Planning and Development.* 115:2, September, 1989.

Attachment 1. Scoping Exercise Worksheets

Project: COA Edith Transfer Station			
Health Determinant: TRAFFIC			
Geographic Scope: 2 mile radius of Edith Station			
Impact – Research Questions	**Indicator**	**Data Sources**	**Methods**
What is the cumulative impact of the Station, as well as other area businesses, on traffic volume (particularly heavy trucks), traffic congestion, traffic delay, etc.?	Existing traffic counts, congestion measures, delays at key locations.	MRCOG C of A	Data analysis.
How will traffic generated from the Station impact pedestrian safety and parent drop-off/pick-up at schools?	Projected traffic based on additional traffic volumes.	MRCOG	Data analysis.
How will traffic generated from the Station impact the bike paths and bicycle safety?	Projected traffic based on additional traffic volumes.	MRCOG	Data analysis.
How will traffic generated from the Station impact the vehicles stopped at the railroad crossing?	Projected traffic based on additional traffic volumes sequenced with rail traffic at Griegos/Edith & Rail Runner	MRCOG BN&SF	Data analysis.
How will Station construction impact traffic?	Projected traffic based on additional traffic volumes	MRCOG C of A	Data analysis.
How will heavy truck traffic generated from the Station impact the road quality of neighborhoods?	Projected traffic based on additional traffic volumes. Adequacy of existing road network.	MRCOG C of A	Data analysis.
Has traffic increased on Griegos since Montano Bridge?	Pre- and post traffic counts since Montano Bridge construction	MRCOG C of A	Data analysis.
How will the traffic generated from the Station increase traffic (by type of vehicle, time of day, time of year)?	Projected traffic counts based on feasibility study, and Traffic Impact Assessment.	C of A	Data analysis. 18-wheelers = 100%/time; garbage trucks off 80% time – inconsistent.

How will the Station operate? Do trucks all go out at the same time? What time do they return? Do trucks travel throughout the day? What will the truck routes be? What will be the total number of trucks and from where will they originate? How will the route increase the number of large trucks in the area? # of trucks/day?	Projected traffic counts based on feasibility study, Traffic Impact Assessment.	C of A	Data analysis.
How will traffic to this Station be impacted if other Stations are shut down?	Projected traffic counts based on data from Montessa Park, Don Reservoir, and Eagle Rock Stations.	C of A	Data analysis. Received weekly and weekend counts from Byron.
How will the on-off of I-25 be impacted by the Station's traffic? Will the on-ramps off-ramps be re-designed/re-graded? What is the historical traffic data in the area – going toward the freeway, frontage road?	Projected traffic counts. I-25 off-ramp/onramp plans	MRCOG C of A	Data analysis.
How will traffic affect historical house structures (i.e Battan House - Griegos and Edith)	Projected traffic counts. Structural engineer analysis	MRCOG Structural engineer	Data analysis. Document review.
How will traffic impact students at Menaul, La Luz, Little League Teams, YDDC?	Projected traffic counts with emphasis on traffic congestion impacts on entrance/exists from subject facilities	MRCOG Other stakeholders C of A	Data analysis. Interviews. Document review.
How will the Station's traffic impact citywide traffic?	Projected traffic counts.	MRCOG C of A	Data analysis.
How will the City plan for road repairs and maintenance in the North Valley?	Road maintenance budget.	C of A Bernalillo County NMDOT	Data analysis.
What has happened in other areas, i.e. Phoenix? What has happened with other transfer stations when were they built and what happened after they opened? What was the impact on traffic/housing?	Review of related materials, website searches.	Interviews with Public Works Departments in other communities.	Data analysis. Interviews.
What are the complaints on existing transfer stations in Albuquerque?	Complaint roster – 311.	C of A, Betty Green	Document review.

Project: COA Edith Transfer Station			
Health Determinant: AIR QUALITY			
Geographic Scope: 2 mile radius of Edith Station			
Impact – Research Questions	**Indicator**	**Data Sources**	**Methods**
What is the impact of traffic generated by the Station on air quality (particulate matter from diesel engines, and ozone levels)?	Projected air quality (particulate matter, ozone)	C of A air monitoring stations C of A emission inventory C of A operations plans for Station	Data review and analysis.
How will construction of the Station, and associated traffic, impact air quality?	Traffic related pollutants such as particulate matter (# of construction related vehicles)	Literature review. Baseline air quality data from air monitoring stations and emission inventories.	Data review and analysis.
What are the existing concentrations of air pollutants at the site? In the neighborhood?	Concentrations of particulate matter, ozone, carbon monoxide.	EPA – existing air quality data.	Data review and analysis.
What are the emissions from existing facilities?	Existing concentrations of air pollutants.	EPA – emissions inventory.	Data review and analysis.
What are the emissions from compacting and other equipment, and fleet, at the Station?	Modeling based on fleet number and characteristics, miles, etc.	Literature review.	Literature review and data collection/analysis.
Is this going to be an enclosed facility? Will the air circulation be closed? What happens when it breaks down?	Air circulation/filtration system. Air quality protection protocols.	C of A, Architectural design.	Document review.
What are the emissions from existing SWD facilities (air quality concentrations by time of day? Time of year?)	Particulate matter concentrations. Indoor air quality concentrations.	C of A EPA	Data review.

What are the waiting times to get into the Eagle Rock Station?	Waiting time (in minutes) by number of vehicles in line. Number of vehicles that sit idle. Number of service kiosks. Number of lanes. Capacity of Transfer Station.	Architectural design for proposed Transfer Station. C of A for data on Eagle Rock and Montessa Park Transfer Stations.	Interviews. Document review. Data analysis.
Where are Transfer Stations in other cities? Where are landfills? How far do they drive to get to the Transfer Station? What contribution does this have on air quality?	Proximity (in miles) of Transfer Stations to population centers. Location of Transfer Stations in low-income or minority populations. Proximity (in miles) of Transfer Stations to landfills. Number of miles travelled between Transfer Stations and landfills.	Literature. Maps. MapQuest.	Literature review.

Project: COA Edith Transfer Station			
Health Determinant: WATER QUALITY			
Geographic Scope: 2 mile radius of Edith Station			
Impact – Research Questions	**Indicator**	**Data Sources**	**Methods**
How will the Station impact surface water quality of the acequias?	Baseline water quality data. Existing EPA storm water runoff permit. Number of violations.	NM Environment Dept., C of A Environmental Health Dept., EPA	Document review.
How will the City control surface water runoff from equipment washing and other Station operations?	Architectural Design. Storm water runoff prevention protocols.	C of A Operations Plan. Part of our questions on January 6th or 7th	Document review.

Project: COA Edith Transfer Station			
Health Determinant: CUMULATIVE IMPACTS – ENVIRONMENTAL INJUSTICE			
Geographic Scope: 2 mile radius of Edith Station			
Impact – Research Questions	**Indicator**	**Data Sources**	**Methods**
How does the Station contribute to existing environmental burdens?	Baseline air quality, traffic, water quality, and other environmental parameters within x distance of the site, plus the subject Station's impact to air quality, traffic, water quality and other environmental parameters.	NM Environment Dept. C of A, Environmental Health Dept., EPA Air Toxins database, literature review of diesel emissions based on fleet age and numbers.	Document review. Literature review. Statutes review. Operations review.
How does the Station contribute to existing health burdens?	Existing prevalence of asthma, upper respiratory, lower respiratory, cardiovascular, diabetes disease rates.	NM Department of Health, IBISS.	Data analysis. Database review.
What is the impact of the Station to nearby vulnerable populations (students, Little League teams, YDDC)	Demographic, socio-economic status of impacted community by 5-year age cohorts. Number of participants/students/detainees.	US Census. YDDC demographics. La Luz/Menaul student demographics. Little League frequency.	Data analysis. Database review. Primary data collection.

Project: COA Edith Transfer Station			
Health Determinant: ECONOMIC WELLBEING			
Geographic Scope: 2 mile radius of Edith Station			
Impact – Research Questions	**Indicator**	**Data Sources**	**Methods**
How will the Station impact property values?	Comparison of property value depreciation of post-construction for other Transfer Stations.	Peer-reviewed literature. Realty Trac data on neighborhood property depreciation.	Literature review. Data collection and analysis.
How will the Station improve the City's economic situation?	Costs associated with land lease/purchase, fuel and maintenance costs of fleet for travel to/from Cerro Colorado, Transfer Station construction/maintenance, etc.	C of A feasibility study.	Document review, underlying assumptions, economic impact analysis.
How will the Station impact the revenues of local businesses?	Annual business revenues	Business annual reports	Data analysis. Document review.
How will the Station impact historical properties?	Aesthetic and monetary value of existing historical properties. Structural integrity measure of existing historical properties.	Engineering report.	Document review.

Project: COA Edith Transfer Station			
Health Determinant: NOISE			
Geographic Scope: ¼ mile radius of Edith Station			
Impact – Research Questions	**Indicator**	**Data Sources**	**Methods**
How much noise will be generated during the Station's construction?	Noise meter measurements (decibels). Noise prevention protocols at other Stations.	Primary data collection. Noise prevention protocols.	Noise meter. Document review. Literature review.
How will the Station contribute to noise (e.g., idling heavy truck traffic, operations, general traffic)?	Noise meter measurements – during weekend hours (decibels). Noise prevention protocols at other Stations. Number of resident complaints regarding noise at other Stations.	Primary data collection. Noise prevention protocols. C of A logged complaints database.	Noise meter. Document review of architectural design. Document review of noise abatement protocols. Document review of complaint database. Literature review.

Project: COA Edith Transfer Station			
Health Determinant: PESTS			
Geographic Scope: ¼ mile radius of Edith Station			
Impact – Research Questions	**Indicator**	**Data Sources**	**Methods**
How will the Station impact vector-related diseases and vectors?	Vector control protocols. Incidence of vector-borne disease among residents of impacted community compared with Bernalillo County as a whole. Vector related complaints from residents near other Stations.	C of A vector control protocols for other Stations. NM Department of Health IBISS. C of A logged vector related complaints.	Document review. Data analysis of health data.

Attachment 2. Trucks to and from SWD facility, Friedman, and Landfill (Provided by J. Holbert & J. Soladay).

Type of service	#/Type of trucks	# Daily structured routes	Non-scheduled	Service days	# trips/day to landfill per truck	Total trips to landfill per day	# trips/day to Friedman	# trips/day/weekend	# trips/day/weekday
Commercial bin	47 front load trucks	26		M-F	2	52		0	26
Commercial bin-hazard	Front loader	8		M-F	2	16		0	8
Commercial bin	Front loader	7		Sat	2	14		7	0
Commercial recycling	Front loader	2		7 days/week		0	4	2	2
Rear loader	Rear loader	1		Sat	2	2		1	0
Roll-off service	27 roll-off trucks	17		M-F	5	85		0	17
Roll-off service	Roll-off truck	1		Sat	5	5		1	0
Roll-off service	Roll-off truck	Specials	110 containers	M-Sat	15	15		3	0
Residential trash	92 automated trucks	48		M-F	2	96		0	48
Residential recycling	Automated	22		M-F		0	44	0	22
Collection support vehicles	4 pickup trucks		28	M-Sat				4	28
Missed pickup	Pup automated	2	Missed routes from day	M-F	2	4		0	2
Collection bin support	4 flatbed trucks	3	1	M-F				0	3

Fleet services support	4 heavy duty service trucks	Dispatched as needed	4	M-Sat				4	4
Administration	Personal vehicles of staff (341 employees)			M-F				30	341
Administrative support	6 pickup trucks		6	M-F				0	6
Total	**241**	**137**				**275**	**48**	**52**	**507**

Attachment 3

Facilities permitted to release air pollutants within a two-mile radius of the proposed Edith Station. Permitted pollutants may include VOC (volatile organic compounds), PM 2.5 (particulate matter less than 2.5 microns in diameter), PM 10 (particulate matter less than 10 microns in diameter), NOX (nitrogen dioxide), CO (carbon monoxide), TSP (total suspended particles), HAPS (hazardous air pollutants), and SOX (sulfur dioxide). The existing COA facility is registered under permit number 659.

Permit No.	Facility Name	Facility Address	Permit Type	Industry Type
231	GIANT INDUSTRIES INC.	135 CANDELARIA RD NW	VOC, PM10	Gas Service/Fleet Stations
238	GIANT INDUSTRIES INC.	6242 4TH ST NW	VOC, PM10	Gas Service/Fleet Stations
247	PETROLINK/EVERREADY OIL COMPANY	1201 CANDELARIA RD NW	VOC, PM10	Gas Service/Fleet Stations
289	CITY OF ALBUQUERQUE FLEET MGMT DIV. - 4TH STREET SITE	1801 4TH ST NW	VOC, PM10	Gas Service/Fleet Stations
336	DIAMOND SHAMROCK STORE #1216	401 MONTANO RD NW	VOC, PM10	Gas Service/Fleet Stations
407	BREWER OIL COMPANY	3200 CANDELARIA RD NE	CO, PM10	SVES
437	FIREPROOFING PRODUCTS INC.	5119 EDITH BLVD NE	NOX, TSP, PM10	Aggregate Processing
441	ROADWORKS	6001 CHAPPELL RD NE	TSP, PM10	Aggregate Processing
460	RIO GRANDE PORTLAND CEMENT	100 MONTANO RD NE	TSP	Cement Distribution Terminal
567	PHILLIPS 66 COMPANY SITE # 2706247	5605 4TH ST NW	VOC	Gas Service/Fleet Stations
603	UNITED PARCEL SERVICE	2401 COMANCHE RD NE	PM10	Gas Service/Fleet Stations
632	RENTAL SERVICE CORPORATION	2401 MENAUL BLVD NE		Gas Service/Fleet Stations
659	CITY OF ALBUQUERQUE SOLID WASTE MANAGEMENT - EDITH FACILITY	4600 EDITH BLVD NE	VOC	Gas Service/Fleet Stations
685	CIRCLE K STORE NO. 1777	2001 MENAUL BLVD NE	VOC	Gas Service/Fleet Stations
698	7-ELEVEN	3808 MONTGOMERY BLVD NE	VOC	Gas Service/Fleet Stations
708	7-ELEVEN	3610 CANDELARIA RD NE	VOC	Gas Service/Fleet Stations
717	UNIVERSITY OF NEW MEXICO CONTINUING EDUCATION	1634 UNIVERSITY BLVD NE	NOX	Boilers
817	CHARM CURTAIN CLEANERS INC	5813 4TH ST NW		Dry Cleaners
826	SUN RAY CONSTRUCTION	523 RANKIN RD NE	TSP	Wood Manufacturing

859	ALBUQUERQUE CABINETS	730 RANKIN RD NE	VOC, TSP, HAPS	Wood Manufacturing
860	FAME MFG	3900 BOGAN AVE NE	TSP	Wood Manufacturing
861	WESTWOOD CABINETS	3011 2ND ST NW	TSP	Wood Manufacturing
869	DIAMOND PRESS	2901 EDITH BLVD NE		Sheetfed Offset Lithography
873	AURORA PUBLISHING LLC	2400 MENAUL BLVD NE	VOC	Sheetfed Offset Lithography
1146	ECONOMY GAS & FOOD MART	2523 4TH ST NW	VOC	Gas Service/Fleet Stations
1149	PLATEAU GAS STATION #119	5565 4TH ST NW	VOC	Gas Service/Fleet Stations
1194	COMANCHE GAS INC.	600 COMANCHE RD NE	VOC	Gas Service/Fleet Stations
1238	RIO GRANDE OIL COMPANY	3205 MONTGOMERY BLVD NE	VOC	Gas Service/Fleet Stations
1247	BREWER OIL CO. STORE # 66	2021 MENAUL BLVD NE	VOC	Gas Service/Fleet Stations
1251	BREWER OIL CO. STORE # 62	3208 RICHMOND DR NE	VOC	Gas Service/Fleet Stations
1292	MEGA CORPORATION	700 OSUNA RD NE	CO, NOX, SOX, VOC, TSP, HAPS, PM10	Manufacturing
1294	J&S MARBLE INC	2501 COMMERCIAL ST NE	VOC	Manufacturing
1300	GARFIELD MIDDLE SCHOOL	3501 6TH ST NW	CO, NOX,	Boilers
1304	NW REGION STRONGHURST	120 WOODLAND AVE NW	CO, NOX,	Boilers
1314	HODGIN ELEMENTARY SCHOOL	3801 MORNINGSIDE DR NE	CO, NOX,	Boilers
1321	MISSION AVE ELEMENTARY SCHOOL	725 MISSION AVE NE	CO, NOX,	Boilers
1333	ALBUQUERQUE HIGH SCHOOL	800 ODELIA RD NE	CO, NOX,	Boilers
1510	COMMERCIAL DOOR AND HARDWARE	2914 GIRARD BLVD NE	VOC	Wood Manufacturing
1541	THE PAINT SHOP	1441 CANDELARIA RD NE	VOC, HAPS	Coating and Spraying
1555	TRAVEL CENTERS OF AMERICA	2501 UNIVERSITY BLVD NE	VOC	Gas Service/Fleet Stations
1558	TWIN MOUNTAIN CONSTRUCTION II COMPANY	NW CORNER OF BIG I	CO, NOX, SOX, VOC, TSP, PM10	Aggregate Processing
1586	PETROLINK/EVERREADY OIL COMPANY	2524 4TH ST NW	VOC	Gas Service/Fleet Stations
1587	PETROLINK/EVERREADY OIL COMPANY	5640 4TH ST NW	VOC	Gas Service/Fleet Stations
1589	PETROLINK DBA EVER-READY OIL COMPANY	501 CANDELARIA RD NE	VOC	Gas Service/Fleet Stations
1644	LOWE'S #99 PAY AND SAVE	4701 4TH ST NW	VOC	Gas Service/Fleet Stations
1648	STERICYCLE INC.	1920 1ST ST NW	CO, NOX, VOC,	Nonsource

1661	RIGHT WAY ROOFING	1626 1ST ST NW	TSP	Aggregate Processing
1781	SAM'S EAST INC.	4921 CULTURE DR NE	VOC	Gas Service/Fleet Stations
1850	JOHN S. PALONI	1915 MENAUL BLVD NE	VOC	SVES
1897	CITY OF ALBUQUERQUE POLICE DEPARTMENT	5350 2ND ST NW	PM 2.5	Incinerator
1907	JVP 1 SOIL VAPOR EXHTRACTION SYSTEM	3412 BRYN MAWR DR NE	VOC, HAPS	SVES
1948	FREEWAY LIQUORS	2034 2ND ST NW	VOC	Gas Service/Fleet Stations
1988	NEW MEXICO FLEET DESIGN	4901 EDITH BLVD NE		Paint and Body
1990	DISCOUNT COLLISION	109 HEADINGLY AVE NW		Paint and Body
1995	LUCKY STRIPES & SIGNS	2107 MENAUL BLVD NE		Paint and Body
2002	CARMERS BODY SHOP	119 AZTEC RD NW		Paint and Body
2005	ABQ COLLISION INC.	3610 2ND ST NW		Paint and Body
2009	LOID'S RIDES LLC	4150 EDITH BLVD NE		Paint and Body
2010	L-3 COMMUNICATIONS	3825 EDITH BLVD NE		Paint and Body
2011	CAR CRAFTERS	600 MONTANO RD NE		Paint and Body
2012	SOUTHWEST COLLISION CRAFTSMEN	3401 CLAREMONT AVE NE		Paint and Body
2013	HAROLD'S BODY REPAIR INC.	3811 EDITH BLVD NE		Paint and Body
2026	ADVANCED COLLISION REPAIR	2714 GIRARD BLVD NE		Paint and Body
2044	CROWN COACHWORKS	431 EDMON RD NE		Paint and Body
2067	DIRECT FUNERAL SERVICES	2919 4TH ST NW	CO, NOX, SOX, TSP, PM10, PM 2.5	Crematory
2071	A-ONE COLLISION LLC	2370 AZTEC RD NE		Paint and Body
2074	SERVICE ONE AUTO BODY REPAIR	6446 EDITH BLVD NE		Paint and Body
2095	EARTHGRAINS BAKING COMPANIES INC.	111 MONTANO RD NE	CO, NOX, VOC, TSP, HAPS, PM10, PM 2.5	Manufacturing
2160	SOUTHWEST BIO FUELS LLC	2371 AZTEC RD NE	PM 2.5	NULL
2163	ACTION QUALITY PAINT & BODY	2415 2ND ST NW		Paint and Body
2165	NEW MEXICO SCIENTIFIC LABORATORIES	1101 CAMINO DE SALUD NE	CO, NOX, SOX, PM 2.5	NULL
2184	TLC Company Inc	5000 EDITH BLVD NE	TSP, PM 2.5	Minor NSR
0096r1	LAFARGE SOUTHWEST INC.	6001 CHAPPELL RD NE	TSP	Aggregate Processing

0362m3	Chappell Road Main Hot Mix Asphalt Plant	6001 CHAPPELL RD NE	CO, NOX, SOX, VOC, TSP, PM10, PM 2.5	Hot Mix Asphalt Plant
0363m2	CHAPPELL ROAD MAIN	6001 CHAPPELL RD NE	TSP, PM10	Aggregate Processing
0491m7rv1	OSO BIOPHARMACEUTICALS MANUFACTURING LLC	4401 ALEXANDER BLVD NE	CO, NOX, SOX, VOC, TSP, HAPS, PM10, PM 2.5	Manufacturing
0493m1	RICCOBENE MASONRY COMPANY INC.	6141 EDITH BLVD NE	TSP, PM10, PM 2.5	Manufacturing
0505m1rv2	HOLLYWOOD CONCRETE BATCH PLANT	6001 CHAPPELL RD NE	CO, NOX, TSP, PM10	Concrete Production
0521m1	EARTHGRAINS BAKING COMPANIES INC.	111 MONTANO RD NE	CO, NOX, VOC, TSP, HAPS, PM10, PM 2.5	Manufacturing
0559m3rv1	NK ASPHALT PARTNERS D/B/A HOLLY ASPHALT COMPANY	4949 EDITH BLVD NE	CO, NOX, VOC, TSP, HAPS, PM10	Asphalt Production
0599m1	COSTCO WAREHOUSE #116	1420 N RENAISSANCE BLVD NE	VOC	Gas Service/Fleet Stations
0601m1	LOVE'S COUNTRY STORES	2200 6TH ST NW	VOC	Gas Service/Fleet Stations
0611m1	PUBLIC SERVICE COMPANY OF NEW MEXICO	4201 EDITH BLVD NE	VOC	Gas Service/Fleet Stations
0612rv1	NMGC SERVICE CENTER	4625 EDITH BLVD NE	CO, NOX, VOC, PM 2.5	Gas Service/Fleet Stations
0677m2	CIRCLE K STORE NO. 8698	6600 2ND ST NW	VOC	Gas Service/Fleet Stations
0689m2	CIRCLE K STORE NO. 1428	6130 EDITH BLVD NE	VOC	Gas Service/Fleet Stations
0729m1	DIAMOND SHAMROCK CORNER STORE #1223	1425 UNIVERSITY BLVD NE	VOC	Gas Service/Fleet Stations
0800m3	SUNSET MEMORIAL PARK DBA BEST FRIENDS PET CREMATION	924 MENAUL BLVD NE	CO, NOX, TSP, PM10, PM 2.5	Crematory
0831m1	BARBONES CLEANERS	3812 CARLISLE BLVD NE		Dry Cleaners
0882rv1	NAVARRO'S PAINT & BODY	2401 4TH ST NW		Paint and Body
0902m3rv2	GCC RIO GRANDE INC.	4702 CARLTON ST NW	TSP, PM 2.5	Cement Distribution Terminal
0935m1rv1	CREGO BLOCK	6140 2ND ST NW	TSP, PM10, PM 2.5	Concrete Production
1097m1rv2	OSO BIOPHARMACEUTICALS MANUFACTURING LLC	4401 ALEXANDER BLVD NE	CO, NOX, PM 2.5	Manufacturing
1150m1	RIO GRANDE OIL COMPANY	2012 7TH ST NW	VOC	Gas Service/Fleet Stations
1200rv2	GIANT # 842	3200 MONTGOMERY BLVD NE	VOC	Gas Service/Fleet Stations
1237m1	RIO GRANDE OIL COMPANY	3641 12TH ST NW	VOC	Gas Service/Fleet Stations
1291m1rv1	CREAMLAND DAIRIES	1911 2ND ST NW	CO, NOX, PM 2.5	Boiler
1478rv1	PLASCO SALES	1900 7TH ST NW	VOC, HAPS	Manufacturing

1479m2	TWIN MOUNTAIN CONSTRUCITON II COMPANY	OLD SPRINGER SITE/I40&I25	CO, NOX, SOX, VOC, TSP, PM10	Asphalt Production
1506rv1	KOHLHASS CORPORATION	2212 1ST ST NW	VOC, TSP	Manufacturing
1580m1	J & B MANUFACTURING	5150 EDITH BLVD NE	VOC, NOX, TSP	Abrasive Blasting
1626rv3	LAFARGE SOUTHWEST	6001 CHAPPELL RD NE	CO, NOX, SOX, VOC, TSP, PM10	NULL
1629m1rv2	LAFARGE SOUTHWEST	6001 CHAPPELL RD NE	CO, NOX, VOC, TSP, PM10	NULL
1630rv1	CIRCLE K STORES	1400 MONTANO RD NE	VOC	Gas Service/Fleet Stations
1645m1	PAVEMENT MAINTENANCE OPERATION	3001 COMANCHE RD NE	TSP, PM10, PM 2.5	Aggregate Processing
1829rv1r3	J&H Services	516 MARTINEZ LN NE	CO, NOX, VOC, TSP, PM10, PM 2.5	Aggregate Processing
1987rv1	APM WEST	5531 MIDWAY PARK PL NE	CO	Manufacturing

Attachment 4. Did You Know Community Poster on Edith Station.