Environmental Planning Commission

Staff Report

Agent: Cannady Architect Studio
Applicant: Devin Cannady
Request: Zone Map Amendment
Site Development Plan for Building Permit
Legal Description: Tract B-1, Plat of Tracts A-1 and B-1, Mariposa Square
Location: On Ladera Dr. NW, between 72nd St. NW and Laurelwood Parkway NW
Size: Approximately 2 acres
Existing Zoning: C-1
Proposed Zoning: SU-1 for C-1 Uses to Include self-Storage with Direct Outdoor Access to Individual Units

Staff Recommendation

DEFERRAL of 17EPC-40047, based on the Findings beginning on page 9, for 30 days.

DEFERRAL of Case 17EPC-40046, Site Development Plan for Building Permit Amendment, based on the Findings beginning on page 10, for 30 days.

Summary of Analysis
The proposal is for a zone map amendment for an approx. 2 acre site, zoned C-1. The applicant wants to change the subject site’s zoning to an SU-1 designation in order to allow a self-storage facility with direct outdoor access. The zone change is accompanied by a request for a site development plan for building permit for the storage facility.

The subject site is in an Area of Consistency. The Westside Strategic Plan and the El Rancho Atrisco Phase III Sector Development Plan apply.

The Ladera West NA, the Laurelwood NA, the Westside Coalition, and property owners within 100 feet of the subject site were notified. A neighbor called to indicate his opposition due to concern about noise, traffic, and his home’s value.

Staff recommends a 30 day deferral to allow additional time to ensure that the zone change is adequately justified pursuant to R270-1980, using the “clearly facilitates” standard as required. The time could also be used to address agency comments and neighborhood concerns.

City Departments and other interested agencies reviewed this application from 09/05/2017 to 09/21/2017. Agency comments used in the preparation of this report begin on Page 12.
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I. INTRODUCTION

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<td>Commercial (car wash)</td>
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<td>El Rancho Atrisco Phase III Sector Development Plan</td>
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Proposal

The proposal is for a zone map amendment (zone change) and a site development plan for building permit for an approximately (≈) 2 acre site located on Ladera Dr. NW, between 72nd St. NW and Laurelwood Parkway NW (the "subject site’’), zoned C-1 (Neighborhood Commercial) and known as Tract B-1, Plat of Tracts A-1 and B-1, Mariposa Square.

The zone change (17EPC-40047) is accompanied by a request for a site development plan for building permit (17EPC-40046) as required by the SU-1 zone (14-16-2-22(A)(1)). The applicant proposes to change the subject site’s zoning to SU-1 for C-1 Uses to Include self-Storage with Direct Outdoor Access to Individual Units to allow development of a self-storage facility with direct outdoor access to the storage units. The proposed facility consists of an approximately 440 sf office building and six 3,600 sf self-storage buildings.

EPC Role

The EPC is hearing this case because the EPC is required to hear all zone change cases, regardless of site size, in the City. The EPC is the final decision-making body unless the EPC decision is appealed [Ref: §14-16-2-22(A)(1)]. If so, the Land Use Hearing Officer (LUHO) would hear the appeal and make a recommendation to the City Council. The City Council would make the final administrative decision. The request is a quasi-judicial matter.

Context

The subject site is located in an area characterized by single-family homes and undeveloped land. To the north, at the junction of Ladera Rd. NW and 72nd St., is a car wash. Further north is
the Ladera Pond, a drainage facility consisting of unoccupied land. To the west, south, and east are single-family homes. Further west is the Ladera Business Park.

The subject site is not located in a designated Activity Center or along a designated corridor.

History
The subject site received its current zoning of upon adoption of the El Rancho Atrisco Phase III Sector Development Plan in 1981 (Council Bill No. R-473, Enactment No. 170-1981, see attachments). A 2.5 acre piece of C-1 zoning, which included the subject site, was created near the Plan’s northeastern boundary to provide future neighborhood commercial services. Most of the area was zoned R-T to provide flexibility to meet housing needs, except for the approximately 25 acre planned office park/commercial development zoned SU-1 and known as the Ladera Industrial Park.

The 2.5 acre site was replatted in 1994 (SP-94-91) and Tract A-1 and Tract B-1 were created; the subject site is Tract B-1. The car wash on the lot adjacent north (Tract A-1) was developed in 2004 (Project #1003548/04DRB-10190) and was approved by the Development Review Board (DRB). A zone change was not needed because a car wash is a permissive use in the C-1 zone.

Transportation System
The Long Range Roadway System (LRRS) map, produced by the Mid-Region Council of Governments (MRCOG), identifies the functional classifications of roadways. Ladera Rd. NW is a Minor Arterial. Laurelwood St. is a Minor Collector, and 72nd St. is a local street.

Trails/Bikeways
There are no bike lanes or bike routes along Lomas Blvd. A bicycle lane crosses Lomas Blvd. at Carlisle Blvd., and a bicycle route crosses near Los Altos Park (near Eubank Blvd.)

Transit
ABQ Ride Route #92-Taylor Ranch Express is a commuter route that passes by the subject site. It offers limited, commuter service with two runs in the am and two runs in the pm. There is a bus stop on Ladera Rd., in front of the subject site (see Agency Comments section of this report).

Public Facilities/Community Services
Please refer to the Public Facilities Map (see attachment), which shows public facilities and community services within one mile of the subject site.

II. ANALYSIS of APPLICABLE ORDINANCES, PLANS, AND POLICIES

Albuquerque Comprehensive Zoning Code
The subject site is currently zoned C-1 (Neighborhood Commercial, Zoning Code 14-16-3-16). The request proposes to change the zoning to SU-1 for C-1 Uses to Include self-Storage with Direct Outdoor Access to Individual Units.
The C-1 zone (Zoning Code §14-16-2-16) provides “suitable sites for office, service, institutional, and limited commercial uses to satisfy the day-to-day needs of residential areas.” Permissive uses include office, retail, church, institution, etc. Residential uses are permissive subject to certain requirements and exceptions.

Storage of household goods is a conditional use in the C-1 zone §14-16-2-16(B)(21), and would be allowed if a conditional use is obtained through the Zoning Hearing Examiner (ZHE) process. However, individual storage units are not allowed to be directly accessible from outside of a building in the C-1 zone. Because the applicant wants storage units that are directly accessible from outside of the building, a zone change is needed rather than a conditional use.

The SU-1 zone (Special Use Zone, Zoning Code §14-16-2-22) zone “provides suitable sites for uses which are special because of infrequent occurrence, effect on surrounding property, safety, hazard, or other reasons, and in which the appropriateness of the use to a specific location is partly or entirely dependent on the character of the site design.”

Albuquerque / Bernalillo County Comprehensive Plan

The subject site is located in an area that the 2017 Albuquerque/Bernalillo County Comprehensive Plan has designated an Area of Consistency.

*The applicant has not provided sufficient citations of Goals and Policies in the response to Section C of R270-1980, so a complete policy analysis cannot be done at this time.*

West Side Strategic Plan (WSSP) (Rank II)

The *West Side Strategic Plan (WSSP)* was first adopted in 1997 and amended in 2002 and 2009. The WSSP area is bounded by the Sandoval County line on the north, the Rio Puerco Escarpment on the west, a line south of Gun Club Road (the Atrisco Grant line) on the south, and the Rio Grande on the east for areas north of Central, and Coors Boulevard on the east for areas south of Central. It encompasses over 96,000 acres of land, or approximately 150 square miles. Specific boundaries are shown on the Plan Boundary map on p.2 in the WSSP.

The 2002 amendments to the WSSP include several changes to policies, activity center boundaries and locations, and clarifications of conflicting and unclear policies. The adopting resolution for the amendments (R-01-278, Enactment No. 35-2002) Section 3 states: “The West Side Strategic Plan is a Rank 2 Plan and its provisions shall be mandatory except where they conflict with existing zoning.” In 2009, the *Southwest Albuquerque Strategic Action Plan (SWASAP)* was adopted as part of the WSSP (R-08-169, Enactment R-2009-035, 3/2/2009) and begins on p. 305.

The WSSP identifies 13 communities in established areas of the West Side, each with a unique identity and comprised of smaller neighborhood clusters. The subject site is located in the Ladera community, which lies within the following boundaries: Central Ave. on the north, Coors Blvd. on the east, the 118th St. corridor on the west, and Blake Rd. on the south (see p. 70). The WSSP contains policies particular to the Ladera Community.
The applicant has not provided sufficient citations of WSSP Goals and Policies in the response to Section C of R270-1980, so a complete policy analysis cannot be done at this time.

**El Rancho Atrisco Phase III Sector Development Plan (ERASDP) (Rank III)**

The subject site is located within boundaries of the El Rancho Atrisco Phase III Sector Development Plan (ERASDP3), which was adopted by the City Council in 1981 (Enactment R70-1981). The ERASDP, prepared for Westland Development Company ("Westland") and submitted to the City Planning Department, covers 297 acres north of Interstate 40 and east of Unser Blvd. Upon Plan adoption, Westland petitioned for annexation and zoning of the sector plan area.

The ERASDP established zoning, including single-family, multi-family, and SU-1 for the Ladera Industrial Park. It also established the 2.5 acre portion of C-1 zoning near the northeastern boundary of the Plan area, which contains the subject site. Topics discussed in the Plan include zoning, transportation, utilities, and public facilities. Specific Goals and policies are not included. In general, developing the C-1 zoned parcels with neighborhood commercial services is consistent with the intent of the Plan.

**Resolution 270-1980- Policies for Zone Map Amendments**

**Requirements**

Resolution 270-1980 outlines policies and requirements for deciding zone map change applications. The applicant must provide sound justification for the proposed change and demonstrate that several tests have been met. The burden is on the applicant to show why a change should be made.

The applicant must demonstrate that the existing zoning is inappropriate because of one of three findings: 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 land use category is more advantageous to the community, as articulated in the Comprehensive Plan or other City master plan.

**Justification & Analysis**

The zone change justification letter analyzed here, received on September 26, 2017, is a response to Staff’s request for a revised justification (see attachment). The subject site is currently zoned C-1. The requested zoning is SU-1 for C-1 Uses to Include self-Storage with Direct Outdoor Access to Individual Units. The reason for the request is to allow development of a self-storage facility.

*Staff finds that the September 26, 2017 justification letter does not provide adequate responses to Sections C, D, and I. Because the request is for an SU-1 zone, the requirement is to demonstrate that the request clearly facilitates realization of Goals and policies in applicable Plans.*
In a 2014 decision regarding appeal AC-14-7, the City Council confirmed the LUHO’s opinion that the “clearly facilitates” standard in Section I must be demonstrated to be met in the response to Section C. The appeal was remanded to the Planning Department with specific instructions to make findings whether or not the request satisfied the spot zone standard in Section I, and if it would clearly facilitate realization of the Comprehensive Plan and any applicable sector development plan.

Citations of Goals and additional, relevant policies from the Comprehensive Plan and the WSSP are needed to support the request. The applicant does not make any conclusion regarding the request in Section C. In Section D, a connection between the standard and the response is not made, so the question is not sufficiently answered. Section D is closely related to Section C; these are the most significant sections of R270-1980 and the substance of a zone change request. The response to Section I must indicate that the request clearly facilitates realization of applicable Plans.

III. SITE DEVELOPMENT PLAN FOR BUILDING PERMIT

The applicant proposes to develop a self-storage facility, with direct access to outdoor units. The facility consists of an approximately 440 sf office building and six 3,600 sf self-storage buildings.

A site development plan is required when requesting a SU-1 zone pursuant to Zoning Code 14-16-2-22(A)(1) because, in the case of an SU-1 zone, the zoning and the site development plan are interdependent. Because further justification is needed for the zone change request, the proposed site development plan is not being discussed in full at this time.

Staff will continue to work with the applicant regarding the proposed site development plan which, at this time, would need several conditions of approval. For example, some items need correction to show that Zoning Code requirements are met: parking calculations and the landscaping plan (palette, notes, irrigation, details). Agency comments should be addressed before the EPC.

IV. AGENCY & NEIGHBORHOOD CONCERNS

Reviewing Agencies

City departments and other interested agencies reviewed this application from 9/5/2017 to 9/21/2017. Transportation Development Staff are requesting some revisions to the proposed site development plan, and noted (in error) that a variance is needed to allow reduced parking requirements (Note: The EPC has discretion over parking pursuant to the SU-1 zone). Department of Municipal Development (DMD) Staff request DMD requests that further coordination regarding the planned improvements to Ladera Dr. that affect the subject site. Solid Waste Management Staff noted that the proposed location of the refuse enclosure is inaccessible and that roll out bins over 4 yards are not permitted.

Transit Department Staff commented that the landscaping should be redesigned to accommodate a future transit shelter, and requests that the developer grant a 5' x 20' easement behind the sidewalk for the shelter and fill in the existing park strip with paving to create a bridge between
the shelter easement and the curb. Long Range Planning Staff noted that the ponding area on the south side of the site is required to have trees that reach 25’ at maturity planted 25’ on center to buffer and screen abutting residential properties. PNM provided standard comments regarding new service and screening of ground equipment. Agency comments begin on p.12 of this report.

Neighborhood/Public
The Ladera West Neighborhood Association (NA), the Laurelwood NA, the Westside Coalition of Neighborhood Associations, and property owners within 100 feet of the subject site were notified as required (see attachments). A facilitated meeting was not requested.

Staff was contacted by a neighbor, who called on October 3, 2017 after having seen the yellow sign posted. He expressed concern that the proposed use would bring additional noise, traffic, and people to this residential area. He believes that the use could adversely affect the value of his home and is opposed to the proposal.

V. CONCLUSION
The request is for a zone map amendment (zone change) and a site development plan for building permit for an approximately 2 acre site, located on Ladera Dr. NW, between 72rd St. NW and Laurelwood Parkway NW. The applicant proposes to change the subject site’s zoning from C-1 (Neighborhood Commercial) to SU-1 for C-1 Uses to Include self-Storage with Direct Outdoor Access to Individual Units to allow development of a self-storage facility with direct outdoor access to the storage units.

Staff concludes that the applicant has not adequately justified the zone map amendment (zone change) pursuant to R270-1980 at this time. A deferral is needed to allow the applicant additional time to adequately address Sections C, D, and I by adding additional citations of applicable and relevant Goals and policies to ensure the “clearly facilitates” standard (applicable to zone changes to SU-1) is met.

The Ladera West Neighborhood Association (NA), the Laurelwood NA, the Westside Coalition of Neighborhood Associations, and property owners within 100 feet of the subject site were notified as required. Staff was contacted by a neighbor who expressed concern that the proposed use would bring additional noise, traffic, and people to this residential area. He believes that the use could adversely affect the value of his home and is opposed to the proposal.

Staff recommends a 30 day deferral to allow additional time to ensure that the zone change is adequately justified pursuant to R270-1980, using the “clearly facilitates” standard as required. The time could also be used to address agency comments and neighborhood concerns.
FINDINGS - 17EPC-40047, October 12, 2017- Zone Map Amendment (Zone Change)

1. The request is for a zone map amendment (zone change) for an approximately (~) 2 acre site, known as Tract B-1, Plat of Tracts A-1 and B-1, Mariposa Square, located on Ladera Dr. NW, between 72nd St. NW and Laurelwood Parkway NW (the “subject site”).

2. The subject site is zoned C-1 (Neighborhood Commercial). The applicant proposes to change the subject site’s zoning to SU-1 for C-1 Uses to Include self-Storage with Direct Outdoor Access to Individual Units to allow development of a self-storage facility with direct outdoor access to the storage units.

3. The request is accompanied by a request for a site development plan for building permit (17EPC-40046).

4. The subject site is in an area that the Comprehensive Plan has designated an Area of Consistency. The West Side Strategic Plan (WSSP) and the El Rancho Atrisco Phase III Sector Development Plan (ERASDP) also apply.

5. The Albuquerque/Bernalillo County Comprehensive Plan, the WSSP, the ERASDP, and the City of Albuquerque Zoning Code are incorporated herein by reference and made part of the record for all purposes.

6. The September 26, 2017 justification letter does not provide adequate responses to Sections C, D, and I. Because the request is for an SU-1 zone, the requirement is to demonstrate that the request clearly facilitates realization of Goals and policies in applicable Plans. Citations of Goals and additional, relevant policies from the Comprehensive Plan and the WSSP are needed to support the request. A conclusory statement regarding the request is needed in Section C. In Section D and Section I, a connection between the standard and the response needs to be made in order to sufficiently answer the question.

7. The Ladera West Neighborhood Association (NA), the Laurelwood NA, the Westside Coalition of Neighborhood Associations, and property owners within 100 feet of the subject site were notified as required (see attachments). A facilitated meeting was not requested.

RECOMMENDATION - 17EPC-40047, October 12, 2017

DEFERRAL of 17EPC-40047, a zone change from C-1 to SU-1 for C-1 Uses to Include self-Storage with Direct Outdoor Access to Individual Units, for Tract B-1, Plat of Tracts A-1 and B-1, Mariposa Square, an approximately 2 acre site located on Ladera Dr. NW, between 72nd St. NW and Laurelwood Parkway NW, for 30 days, based on the preceding Findings.
FINDINGS - 17EPC-40046-October 12, 2017-Site Development Plan for Building Permit

1. The request is for a site development plan for building permit for an approximately (≈) 2 acre site, known as Tract B-1, Plat of Tracts A-1 and B-1, Mariposa Square, located on Ladera Dr. NW, between 72nd St. NW and Laurelwood Parkway NW (the “subject site”).

2. The applicant wants to develop a self-storage facility with direct outdoor access to the storage units. The proposed facility consists of an approximately 440 sf office building and six 3,600 sf self-storage buildings.

3. The request is accompanied by a request for a zone map amendment (zone change) (17EPC-40047), which has not been adequately justified at this time.

4. The subject site is in an area that the Comprehensive Plan has designated an Area of Consistency. The West Side Strategic Plan (WSSP) and the El Rancho Atrisco Phase III Sector Development Plan (ERASDP) also apply.

5. The Ladera West Neighborhood Association (NA), the Laurelwood NA, the Westside Coalition of Neighborhood Associations, and property owners within 100 feet of the subject site were notified as required (see attachments). A facilitated meeting was not requested.

6. Staff will continue to work with the applicant regarding the proposed site development plan. At this time, several conditions of approval would be needed to show that Zoning Code requirements are met and that agency comments are addressed.

RECOMMENDATION - 17EPC-40047, October 12, 2017

DEFERRAL of 17EPC-40046, a site development plan for building permit, for Tract B-1, Plat of Tracts A-1 and B-1, Mariposa Square, an approximately 2 acre site located on Ladera Dr. NW, between 72nd St. NW and Laurelwood Parkway NW, for 30 days, based on the preceding Findings.

Catalina Lehner
Senior Planner
cc: Cannady Architect Studio, Devin Cannady, 300 Adams St. SE, ABQ,NM  87108
    Karen Boccola, Ladera West NA, 7716 Santa Rosalia NW, ABQ, NM  87120
    Steven Collins, Ladera West NA, 7517 Vista Alegre NW, ABQ, NM  87120
    Gregie Duran, Laurelwood NA, 7525 Maplewood Dr NW, ABQ, NM  87120
    Aaron Rodriguez, Laurelwood NA, 2015 Aspenwood Dr. NW, ABQ, NM  87120
    Gerald Worrall, Westside Coalition of NAs, 1039 Pinatubo Pl. NW, ABQ, NM  87120
    Harry Hendriksen, Westside Coalition of NAs, 10592 Rio Del Sole Ct NW, ABQ, NM 
    87114
CITY OF ALBUQUERQUE AGENCY COMMENTS

PLANNING DEPARTMENT

Zoning Code Services
No adverse comments.

Office of Neighborhood Coordination

Long Range Planning
The ponding area on the south side of the site needs trees that reach 25' at maturity planted 25' on center to act as buffer and visual screening for abutting residential properties.

CITY ENGINEER

Transportation Development
17EPC-40046 Site Development Plan for Building Permit- Conditions:

1. Developer is responsible for permanent improvements to the transportation facilities adjacent to the proposed development site plan, as required by the Development Review Board (DRB).

2. Site plan shall comply and be in accordance with all applicable City of Albuquerque requirements, including the Development Process Manual and current ADA criteria.

The following comments need to be addressed prior to DRB:

1. The ADA accessible parking sign must have the required language per 66-7-352.4C NMSA 1978 "Violators Are Subject to a Fine and/or Towing." Please call out detail and location of HC signs.

2. The ADA access aisles shall have the words "NO PARKING" in capital letters, each of which shall be at least one foot high and at least two inches wide, placed at the rear of the parking space so as to be close to where an adjacent vehicle's rear tire would be placed. (66-1-4.1.B NMSA 1978)

3. One-way vehicular paths require pavement directional signage and a posted “Do Not Enter” sign at the point of egress. Please show detail and location of posted signs.

4. Parking variance from the Zone Hearing Examiner (ZHE) will be required to reduce parking.

5. The drive entrance must line up with the median in Ladera DR.

17EPC-40047 Zone Map Amendment (Zone Change)- No objection to the request.

Hydrology Development

New Mexico Department of Transportation (NMDOT)
NMDOT has no comments.
DEPARTMENT of MUNICIPAL DEVELOPMENT

Transportation Planning
Ladera Rd. is classified as a Minor Arterial and 72nd St. is a Minor Collector per MRCOG’s 2040 Long Range Roadway System Map.

DMD is currently in the final design stage of a new project along Ladera Rd that will narrow the medians and improve landscaping, which will allow for the addition of bicycle lanes along the roadway. The improvements will extend from west of Unser Blvd. to Ouray Rd. Should this application be approved, DMD requests that further coordination be arranged with our Project Manager, Mr. Joshua Ellison, who can be reached at (505) 768-3657, or jellison@cabq.gov.

Traffic Engineering Operations (Department of Municipal Development):

Street Maintenance (Department of Municipal Development):

RECOMMENDED CONDITIONS FROM CITY ENGINEER, DMD and NMDOT:

WATER UTILITY AUTHORITY

Utility Services
1. 17EPC-40046 Site Development Plan for Building Permit
   • Identification: UPC – 101005923029020207
     a. As a condition for approval, an Availability Statement is required. Requests can be made at the link below.
        ii. Request shall include a City Fire Marshal approved Fire 1 Plan and a zone map showing the site location.
2. 17EPC-40047 Zone Map Amendment (Zone Change)- No adverse commitment.

ENVIRONMENTAL HEALTH DEPARTMENT

Air Quality Division

Environmental Services Division

PARKS AND RECREATION

Planning and Design
Open Space Division

City Forester

POLICE DEPARTMENT/Planning
SOLID WASTE MANAGEMENT DEPARTMENT

Refuse Division
Site Plan/Bldg. Permit- All new/proposed refuse enclosures must be built to COA minimum requirements. Need site plan to scale w/new/proposed refuse enclosure clearly indicated, to verify safe refuse truck access. Suspected enclosure location behind office bldg. is not accessible w/refuse truck and roll-out bins over 4 yds are not permitted.

**FIRE DEPARTMENT/Planning**

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<tr>
<td>Zone Map Amendment from C-1 to SU-C1 and Site Plan for Building Permit for a self-storage facility on 1.9 acres at Ladera and 72nd Street</td>
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<tr>
<td>Not on a Corridor</td>
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<tr>
<td>Commuter Route 92</td>
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<td>Stop pair for the Route 92 is directly adjacent to the site on Ladera Road</td>
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<tr>
<td>The Site Plan notes that the 10% transit credit is being taken for parking, but takes no note at all that there is a bus stop in the Ladera right-of-way. The landscaping should be redesigned to accommodate a future transit shelter and ABQ RIDE requests the developer grant a 5' x 20' easement behind the sidewalk for the shelter and fill in the existing park strip with paving to create a bridge between the shelter easement and the curb. Aerial photo transmitted separately to the staff planner.</td>
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**COMMENTS FROM OTHER AGENCIES**

**BERNALILLO COUNTY**

**ALBUQUERQUE METROPOLITAN ARROYO FLOOD CONTROL AUTHORITY**

Reviewed. No comment.
ALBUQUERQUE PUBLIC SCHOOLS
This will have no adverse impacts to the APS district.

MID-REGION COUNCIL OF GOVERNMENTS
No adverse comments.

MIDDLE RIO GRANDE CONSERVANCY DISTRICT

PUBLIC SERVICE COMPANY OF NEW MEXICO

1. It is the applicant’s obligation to determine if existing utility easements or rights-of-way are located on or adjacent to the property and to abide by any conditions or terms of those easements.

2. It is necessary for the developer to contact PNM’s New Service Delivery Department to coordinate electric service regarding this project. Contact:
   Andrew Gurule, PNM Service Center
   4201 Edith Boulevard NE Albuquerque, NM 87107
   Phone: (505) 241-0589

3. Ground-mounted equipment screening will be designed to allow for access to utility facilities. All screening and vegetation surrounding ground-mounted transformers and utility pads are to allow 10 feet of clearance in front of the equipment door and 5-6 feet of clearance on the remaining three sides for safe operation, maintenance and repair purposes. Refer to the PNM Electric Service Guide at www.pnm.com for specifications.
Catalina, regarding the above noted project I request a 30 deferral to provide time for refinement of the project.

Thank you.

Devin Cannady
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www.cannadystudio.com

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Albuquerque, NM 87108

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