Heyne, Catherine M.

From: Jane Baechle <jane.baechle@gmail.com>

Sent: Monday, April 15, 2024 6:15 PM **To:** Heyne, Catherine M.; Planning EPC

Subject: EPC Meeting of 4/18/2024

Attachments: Master Plan EPC.pdf

[EXTERNAL] Forward to phishing@cabq.gov and delete if an email causes any concern.

Re: PR-2018-001577 SI-2024-00321

DEII Airport Master Plan Major Amendment

Please include the attached letter in the 48 hour materials for this meeting.

The letter represents my individual comments re: the proposed amendments to the Double Eagle II Master Plan to be discussed at this meeting.

I appreciate your assistance in ensuring this is distributed to the Chair and Commissioners and reflected in the record of 48 hour materials.

I would also appreciate confirmation this has been received and included.

Thank you for your time and assistance.

Jane Baechle

Jane Baechle 7021 Lamar Avenue NW Albuquerque, NM 87120 Jane.Baechle@gmail.com

Date: April 15, 2024

To: Jonathan Hollinger

Chair, EPC

From: Jane Baechle

Re: PR-2018-001577

SI-2024-00321

DEII Airport Master Plan Major Amendment

Chair Hollinger and Commissioners,

I am writing to *oppose* the requested changes to the DEII Airport Master Plan which would permit additional uses including commercial, lodging, light industrial, film studio, educational and renewable energy generation. My opposition is not specifically about the inclusion of any non-aeronautical uses. Rather, it reflects the real risk that added uses under this application would not be sensitive to the natural and cultural landscape of the NW Mesa and the Petroglyph National Monument and that even existing IDO requirements for development adjacent to MPOS and PETR are insufficient when uses are approved in the absence any site plans.

The application cites multiple goals and policies of the ABC Comp Plan which support its request. Notably, it does not cite Comp Plan Goal 11.3, Cultural Landscapes, "Protect, reuse and/ or enhance significant cultural landscapes as important contributors to our heritage and rich and complex identities."

Policy 11.3.1 and specific sub-policies call for the protection of views with "site design that enhances and leverages views to and from cultural landscapes" and includes limits on building heights as well as building designs and colors that blend with the natural landscape. Policy 11.3.4 specifically references the Petroglyph National Monument and defines it as encompassing the *volcanoes and NW mesa* as well as the escarpment. The language of 11.3.4 also calls for the protection of views and development that blends with the landscape. Integration into the landscape requires more than simply using natural colors and native plants.

There appears to be an assumption in this application that IDO requirements for development near MPOS and the Petroglyph National Monument will adequately protect these areas from the impacts of new uses, particularly the impact on the cultural and natural landscape. Yet, the area remains zoned NR-SU where dimensional standards are not defined but subject to site plan approval by the EPC and no site plans are available or submitted with this application. "5-1(E)(2) (b) NR-SU Zone District Dimensional standards in NR-SU shall be determined in the approval of a Site Plan – EPC as part of the approval of a Zoning Map Amendment to the NR-SU zone district.

In my view, this application contains inadequate protections of the Cultural Landscape as defined in the ABC Comp Plan and IDO process and risks allowing profoundly damaging development by approving uses in the absence of site plans or dimensional standards. I respectfully request that the application be denied until protections of the cultural landscape are adequately defined and enforceable.

Sincerely,

Jane Baechle

April 15, 2024

To: Jonathan Hollinger

Chair, EPC

From: Elizabeth Haley

Re: PR-2018-001577 SI-2024-00321

DEII Airport Master Plan Major Amendment

A Master Plan must conform to a Comprehensive Plan. The Double Eagle II Airport Master Plan is an overlay zone. It supersedes ordinance regulations. In 2019, the Albuquerque City Council approved and laid out the required steps for a DEII Master Plan Aviation Amendment: "The Double Eagle II Airport Master Plan (2018 the DEII Master Plan) would supersede the existing Airport Master Plan: Double Eagle II Airport (2002). The 2018 DEII Master Plan contains standard elements such as a facilities inventory, a needs assessment, forecast, development alternatives, and a Capital Implementation Plan (CIP) with a 20-year horizon."

A simple text amendment to the DEII Master Plan is not a substitute for a Master Plan Amendment Process. Although much of the amended 2018 aviation plan could support the uses outlined in the proposed text amendment, a Master Plan Process ensures that proposed changes are appropriate. The Planning Department notified some interested parties of future preparation and review of the design criteria, site plan approval process, and the preparation of the new Master Plan. However, the Master Plan has not been amended by the City Council as it was in 2019. There are no supporting zone maps, traffic, transportation, or infrastructure statements, facilities inventory, a needs assessment, forecast, development alternatives, and a Capital Implementation Plan (CIP) with a 20-year horizon. The City must clarify how the proposed changes would meet the Comprehensive Plan's Goals and policies listed below and excerpted from the same legislation. An aviation planner did meet with the Westside Coalition in April, but the coalition meeting is not a facilitated meeting or part of the record. The Westside Coalition has yet to receive notice from the City, although it is listed as a required notification in the 2019 legislation.

Has the City of Albuquerque Planning Department and the City Council truncated the planning and approval process by scheduling a quasi-judicial hearing to approve a yet-to-be-completed master plan? Approving a text amendment doesn't amend the supporting studies in the 2018 DEII Master Plan or stipulate how the text changes conform to the Comprehensive Plan. The EPC should defer this issue until those critical steps, data, and processes are completed.

Best regards;

Elizabeth Haley Westside Resident; member of WSCONA 6005 Chaparral Circle NW, Albuquerque 87114 elizabethkayhaley@gmail.com

The language below is excerpted from the same legislation and is an outline of the information provided in the last DEII Aviation Master Plan amendment.

END NOTES:

Excerpted 2018 the DEII Master Plan Legislation - examples

"The majority of the subject side (approximately three-quarters)) is located in an area that the 2017 Albuquerque Bernalillo county comprehensive plan has designated an Area of Change.

The exception is the airfield which are an Areas of Consistency and account for approximately (one-quarter) of the subject site.

The Albuquerque Bernalillo County Comprehensive Plan and the City of Albuquerque Integrated Development Ordinance (IDO) are incorporated herein by reference and made part of the record for all purposes.

The request furthers the following Land-use Goals and policy (Chapter 5):

- (i) Goal 5.3 Efficient Development Patterns: Promote development patterns that maximize the utility of existing infrastructure and public facilities and the efficient use of land to support the public good. The DE my eyes airport master plan 2018 addresses landside facilities that support aviation functions such as the administration buildings feel farm and hangers these maximize the utility Love existing infrastructure at the airport which was installed in 2003 and contributes to the efficient use of land to generally support the public good.
- (ii) Policy five. One. Five –E employment centers: create centers that prioritize employment opportunities and foster synergy among businesses. The DE my eyes airport is designated as a developing employment center by the comprehensive plan. It is envision to continue to be used as a commercial airport heliport and to expand its usage as a training center which would prioritize employment opportunities and foster synergy among aviation in aviation support businesses.
- (G) The request furthers the following Comprehensive Plan Goals and policies regarding city development areas:
- (i) Goal 5.6 City Development Areas: Encourage and direct growth to Areas of Change where it is expected and desired and ensure that development in and around Areas of Consistency reinforces the character and intensity of the surrounding area.

In general, airport and non-aviation growth would be directed to areas of change where it is expected and desired, and the Areas of Consistency would remain constant because growth is not desired there.

(ii) Policy 5.6.2 –Areas of Change: Direct growth and more intense development to Centers, Corridors, industrial and business parks and Metropolitan Redevelopment Areas where change is encouraged

The subject site is primarily designated as an area of change. The majority of the subject side is undeveloped and is envision to be used for airport and Airport related expansion and businesses in the future.

(iii) Policy 5.6.3-Areas of Consistency: Protect and enhance the character of existing single family neighborhoods areas outside of centers in Corridors, parks, Major Public Open Space.

The airfield areas which are a relatively small portion of the subject side, are not envision to change much accept for updates to meet federal safety standards.

- (H) The request furthers the following Comprehensive Plan Goals and policies regarding transportation (Chapter 6):
 - (I) Goal 6.6 Economy: Invest in a transportation system that stimulates and supports job creation and business development and improves the movement of people, goods, and services.

As discussed in the Master Plan, air travel is part of a larger transportation system that facilitates the movement of people, goods, and services. The DE IIII Airport has the potential to simulate and support job creation because expansion of the landside facilities would provide jobs that support aviation functions (such as administration and facilities used to train pilots). It's possible that some of the property in the subject site could develop with office, commercial, and industrial uses as is the case with the Sunport which would support business development and job creation.

(ii) Policy 6.2.19- Aviation: provide adequate accommodations for domestic travel shipping and military purposes.

Hey major purpose of the DE IIII master plan is to ensure that future demand for aviation (air side) and aviation support (landside) facilities can be accommodated. The master plan evaluates existing facilities uses forecast to determine future needs and proposes strategies to ensure that these functions can be adequately accommodated.

(i) The request furthers Goal 12.1 Infrastructure: Plan, coordinate and provide for efficient, equitable, and environmentally sound infrastructure to support existing communities and the Comp Plan's vision for future growth (Chapter12-Infrastructure, Community Facilities, and Services).

The 2018 DEIIII Master Plan focuses on Airport infrastructure (runways, terminals, support services) needed to support existing and anticipated aviation and aviation related needs. This supports the community because, as a general aviation airport, DEII accommodate smaller aircraft (planes and helicopters) used by businesses and individuals. Should additional infrastructure be needed in the future it would be planned and coordinated with the City's Capital Improvement (CIP) program and the Water Utility Authority.

- (J) The applicant and planning department staff will coordinate in the future to discuss proposed revisions to the comprehensive plan to be consistent with the updated DEII Master plan.
 - (K) Minor conditions and amendments are recommended to provide clarification.
- (L) The West Side Coalition is the affected neighborhood organization, which was notified as required to see attachments. Property owners within 100 feet of the subject side were also notified as required. A facilitated meeting was neither requested nor held. Staff has not been contacted or received any written comments there is no known opposition.

Passed and Adopted This 4th day of September, 2019."