# *Environmental Planning Commission*

***Agenda Number: 4***
***Project #: 2020-003658***
***SI-2020-00356***
***Hearing Date: August 13, 2020***

# *Supplemental Staff Report*

| | |
|---|---|
| ***Agent*** | Consensus Planning, Inc. |
| ***Applicant*** | Greystar |
| ***Request*** | 1) Major Amendment to Site Plan –EPC |
| ***Legal Description*** | Tracts 1-6 North Andalucia at La Luz<br>Tract 4 North Andalucia at La Luz |
| ***Location*** | SE corner of Coors Blvd. NW and Montano Rd. |
| ***Size*** | Approximately 60 acres |
| ***Zoning*** | PD |

## *Staff Recommendation*

***Denial of SI-2020-00356 based on Findings 1-13 beginning on p. 12.***

***Staff Planner***

***Leslie Naji, Senior Planner***

## *Summary of Analysis*

On July 9, 2020 the EPC began review of this request for Major Amendment of a Prior Approved Site Development Plan for property owned by Greystar. At the time of the hearing, technical issues on the part of community representatives prevented their concerns from being properly provided and considered. As a result, the EPC voted for a continuance to allow supplemental information to be submitted by all stakeholders.

Supplemental view analysis drawings were provided by community representatives and reviewed by staff and shared with the applicant. No new or additional view analysis of this project was submitted by the applicant.

The request consists of the following major changes to the existing, governing site development plan:

1. Increase in density on Tract 4 from 20 units per acre to 24 units per acre.
   - 155 one and two-bedroom apartments
   - 16 duplex cottages
2. Reduction in parking requirements:
   - Multi-family above 1000 square feet from 2 per unit to 1.25 per unit
   - Multi-family less than 1000 square feet from 1.5 per unit to 1.25 per unit

Re-evaluation of the view plane analyses has resulted in a change in staff findings, whereby denial of the application is recommended.

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Hearing Date:
July 9, 2020
Project Number:
PR-2020-003658
Case Numbers:
SI-2020-00356
SI-2020-00357
0
475
950
Feet
N
PR-2020-003658
MONTANO RD
COORS BLVD
ANTEQUERA RD
BOSQUE SCHOOL RD
MIRANDELA ST
WINTER HAVEN RD
LA COLONIA DR
DELLYNE AV
TRES GRACIAS DR
VALLE RIO TRL
B/LIFT STATION #24
K/PRIVATE STREET
A/PRIVATE STREET
COMMON AREA
PRIVATE ACCESS EASEMENT
PRIVATE ROAD EASEMENT
LOWER CORRALES RIVERSIDE DRAIN EXTENSION
CORRALES DRAIN
RIO GRANDE
UNPLATTED

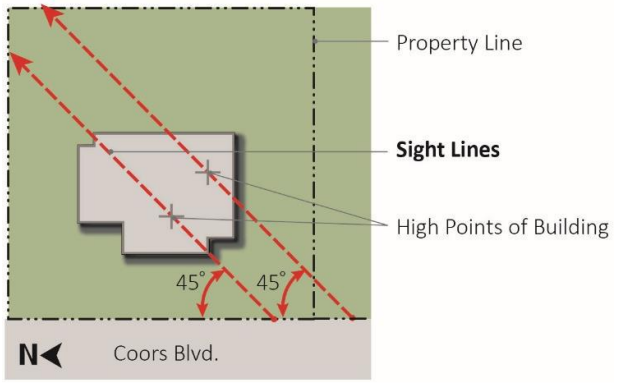
## *I. ANALYSIS OF APPLICABLE ORDINANCES, PLANS, AND POLICIES*

### *Integrated Development Ordinance (IDO)*

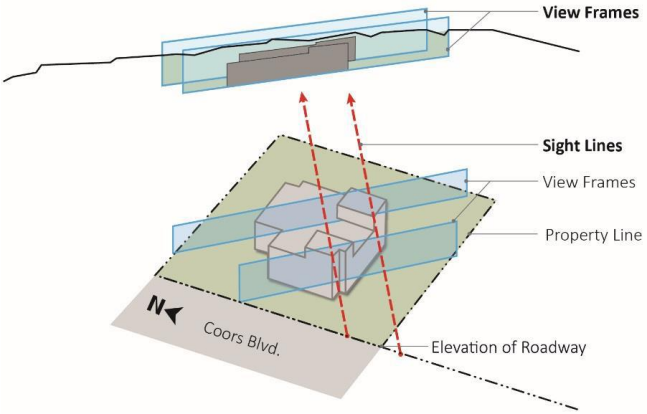
The subject site is zoned PD - Planned Development for residential development. The Master Site Plan for Andalucia at La Luz was approved prior to the effective date of the IDO and may be amended per Subsection 14-16-6-4(Y).

### *a. Definitions in Use*

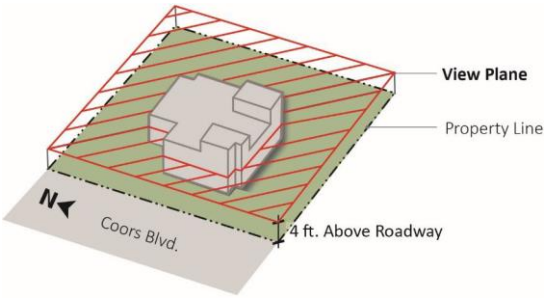
Sight Lines: Lines that begin at the east edge of the Coors Boulevard right-of-way and follow a 45-degree angle to the road alignment, in an approximately northeast direction toward the Sandia ridgeline. Sight lines are required to intersect the highest point(s) of the proposed building(s) on the site and, if the building has no higher point, the lowest elevation(s) of the Coors Boulevard right-of-way abutting or nearest the site (see figure below).




View Frame: A vertical rectangular frame drawn perpendicular (i.e. 90 degrees) to a given sight line through the highest point of the proposed building. The top of the view frame is established by the highest visible point of the Sandia ridgeline within the view frame. The bottom of the view frame is the elevation of the Coors Boulevard right-of-way where the sight line begins. The left and right edges of the view frame are an upward projection of the property lines at the site boundary where the view frame intersects the property lines. As many view frames as necessary to capture all the sight lines on a site are required (see figure below).




**View Plane:** A view plane 4 feet above the elevation of the east edge of the east driving lane on Coors Boulevard and extending horizontally above sites located east of Coors Boulevard (see figure below).




**b. Coors View Protection Overlay, VPO-1**

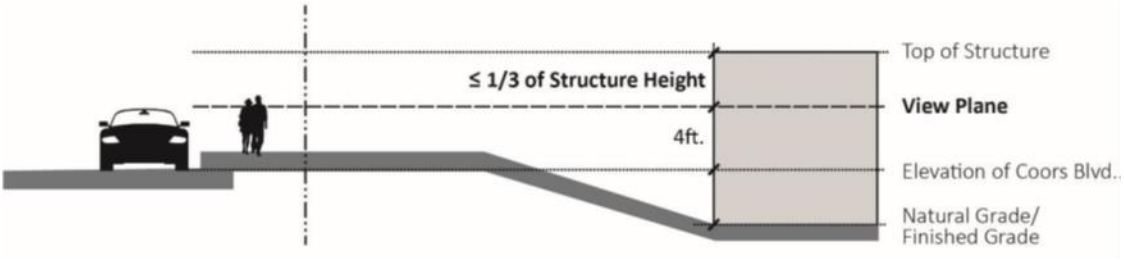
The purpose of the View Protection Overlay (VPO) zone is to preserve areas with unique and distinctive views that are worthy of conservation, such as those from public rights-of-way to cultural landscapes identified in the ABC Comp Plan, as amended.

Views protected by this VPO-1 are from Coors Boulevard right-of-way, along the segment between Western Trail/Namaste Road and Alameda Boulevard, looking toward the Rio Grande Bosque and Sandia Mountains.

3-6(D)(5) Height, Bulk, and Massing
All development within this VPO-1 shall meet all of the following requirements.

3-6(D)(5)(a) No more than 1/3 of the height of structures (including building parapets, mechanical equipment and associated screening, walls, and fences) shall be allowed to penetrate above the view plane as shown in section diagram below. On lots with developable area that is constrained because the natural grade (or finished grade, if infrastructure is already installed) is less than or equal to 10 feet below the elevation of

the east edge of Coors Boulevard and may also include sensitive lands (see Subsection 14-16-5-2(C)), a total height of 16 feet for low-density residential and 20 feet for other uses is allowed (see figure below).



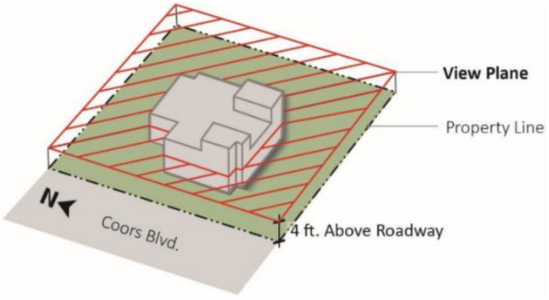

***Planning Staff would like to acknowledge the exhibits provided by Pat Gallagher of the La Luz Neighborhood Association that prompted staff to revisit the applicant's VPO analysis. Mr. Gallagher's exhibit uses multiple site lines as described in 3-6(D)(3)(a).***

***It is important to note that the intent of the Coors VPO is to protect and preserve views of both the Sandia Mountains ridgeline and the Rio Grande Bosque.***

***<u>Height Analysis-View Plane</u>***

***The first requirement is to assess if the 'height' of the structure has more than 1/3 of the building height penetrating the 'view plane'. The View Plane is defined as a horizontal plane 4 feet above the elevation of the east edge of the east driving lane on Coors Boulevard and extending horizontally. (Please note: the higher the elevation of Coors Boulevard, the taller the structure can be and the lower the elevation of Coors Boulevard, the shorter the structure must be.)***

***The Andalucia site is located along Coors Blvd in an area where it drops in elevation from south to north. The applicant has chosen to take the View Plane as a flat plane taken from the highest elevation on Coors determined by a site line utilized in the determination of the View Frame (analysis below). The View Plane makes no mention of a site line but rather just 4 feet above Coors from their chosen location at the site's high point along Coors Blvd.***



***Staff has updated its analysis to acknowledge and reflect this View Plane to be a sloping plane that reflects multiple sight line points because the roadway, including the right driving lane of Coors Blvd, is sloping. The intent of the VPO and its View plane is to protect views along the entirety of the Coors Blvd. roadway and not from one isolated spot. The roadway is not flat and since it is the generator of the View Plane, VPO analysis should accommodate the sloping topography of the roadway.***

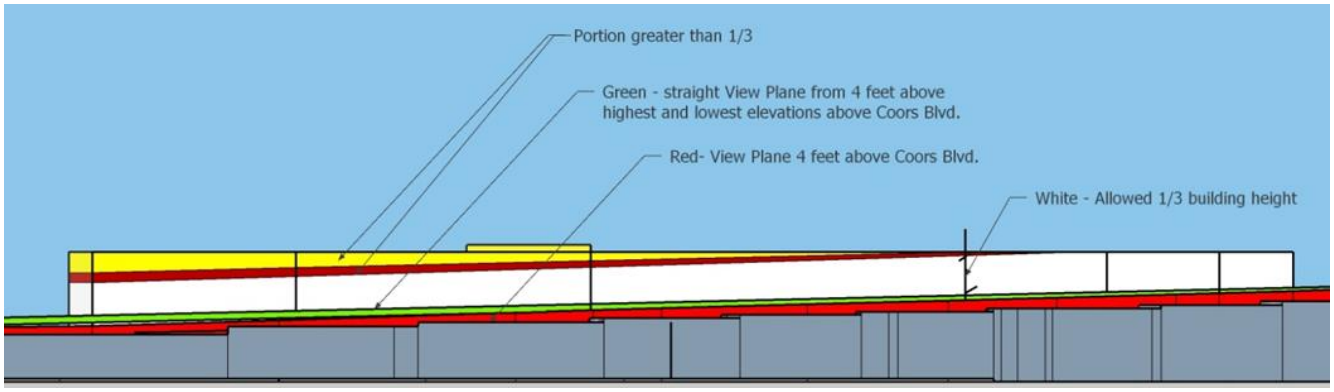


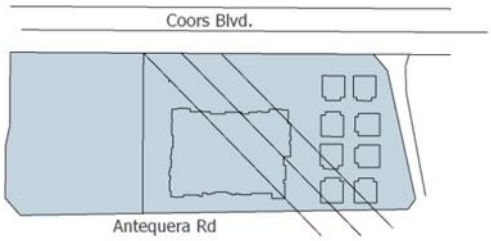

Figure 1: Continuous View Plane

***The image above (Figure 1) shows:***

***Gray = The elevation of Coors Blvd. as it lowers from south to north.***
***Red = The view plane which is the 4-foot measurement above the elevation Coors in a specific location.***
***Green = The View Plane as a straight slope from highest to lowest elevation. Extending that plane horizontally at multiple sight line points.***
***White = the portion of the building allowed to penetrate the view plan (1/3 of the building height.)***
***Yellow: The portion of the building that penetrates the View Plane and is not allowed, per the Green View Plane.***
***Orange: Additional portion of the building that penetrates the View Plane and is not allowed, per the Red View Plane.***

***The applicant contends that this interpretation is without precedent and that the traditional method was to use the elevations along sight lines. The applicant cites several examples where this is the case. However, these examples all use multiple sight lines and include multiple buildings when present. Staff's updated analysis uses multiple sight lines for a site that has multiple proposed buildings and a varying elevation along Coors.***

***Planning staff evaluated the main building using various elevations as the starting point along Coors. The structure height penetrates the View Plane more than the 1/3 of building height allowed in multiple locations toward the northern property line. (See Figure 2).***




View Plane cross-section locations taken from 45-degree angle at various points along Coors Blvd. (see fig. 2 below)

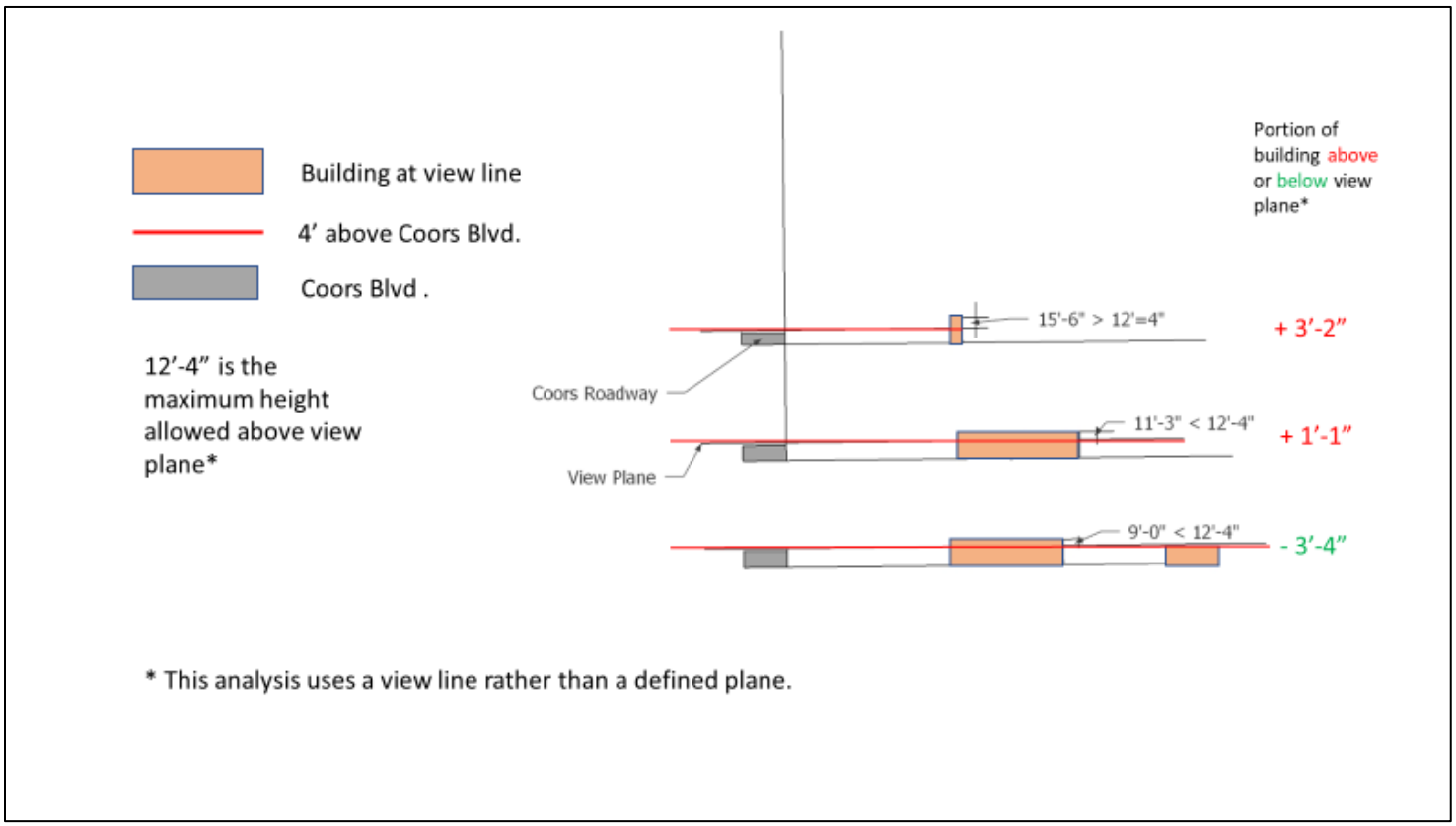
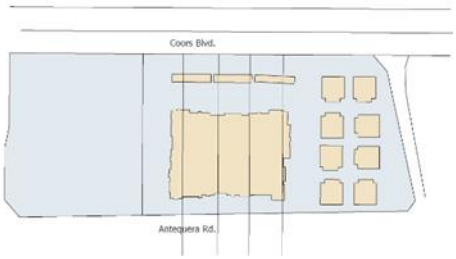



***Figure 2: Various View Planes diagonal to Coors Blvd.***

***The resulting analysis shows points of disallowed penetration of the View Plane and supports the use of a continuous plane using multiple sight lines as represented in Figure 1. If taken perpendicular to Coors, as the Height, Bulk, Massing diagram from the IDO seems to represent, and the original View Protection language of the Coors Corridor plan clearly stated, the non-compliant height above the view plane becomes more apparent.***




View Plane cross-section locations taken from 90-degree angle at various points along Coors Blvd. (see fig.3 below)

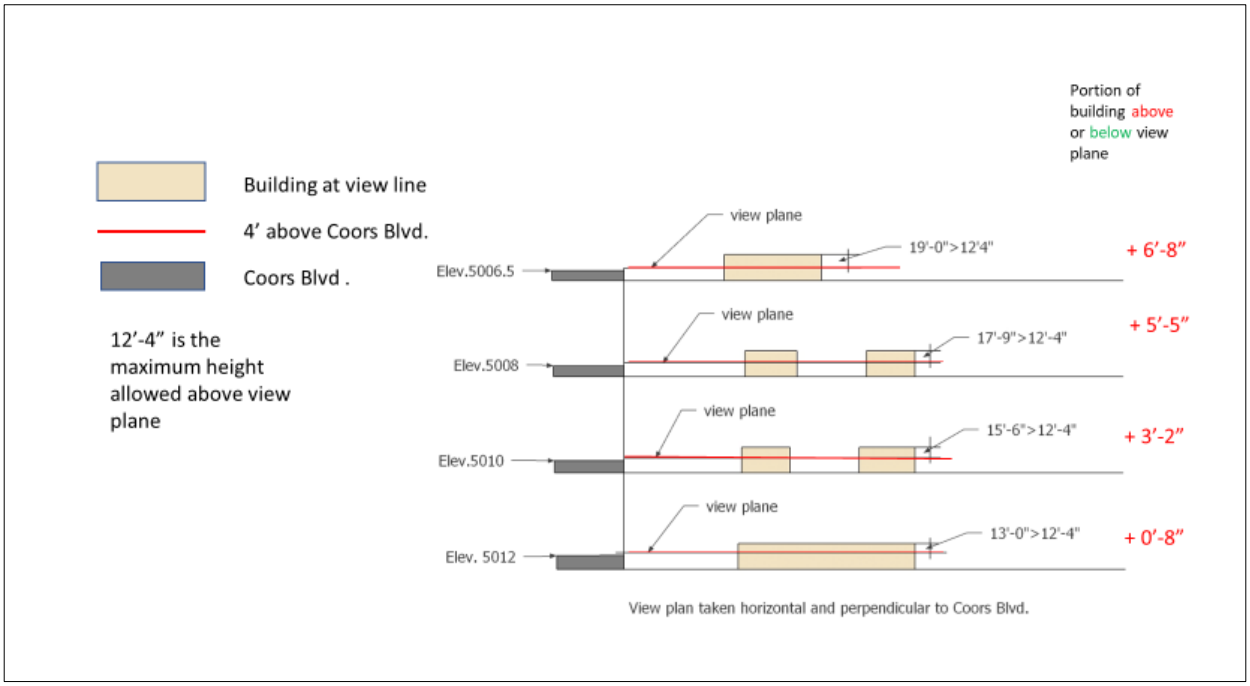


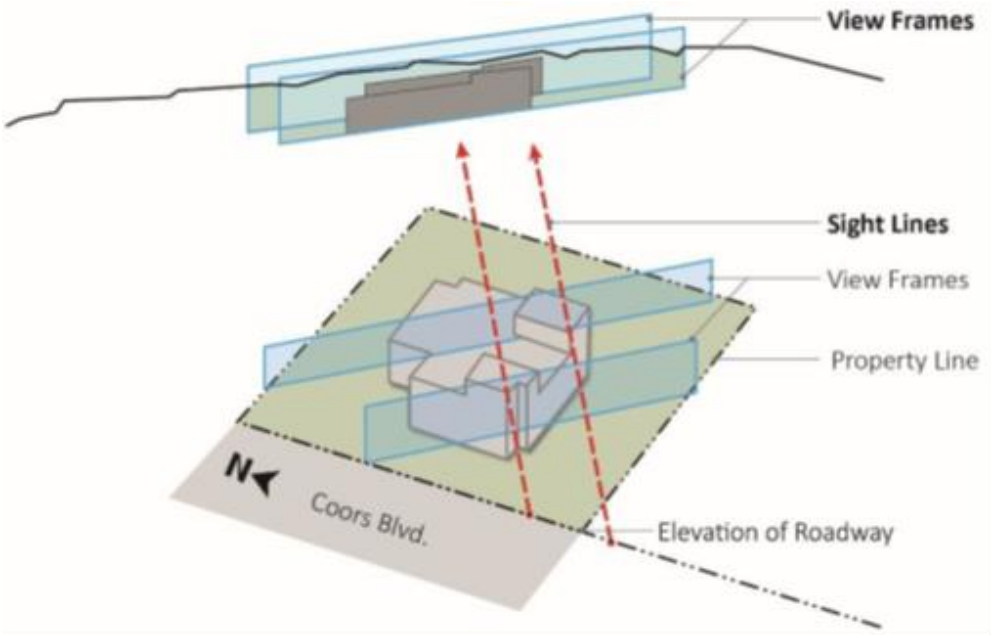

Figure 3: View Plane Drawn Perpendicular to Coors

***In all methods of analysis, a portion of the main building above the view plane, penetrates more than 1/3 of the total building height, in violation of the required view protection regulations. Revisions would be required to the building design and height to meet the VPO standards.***

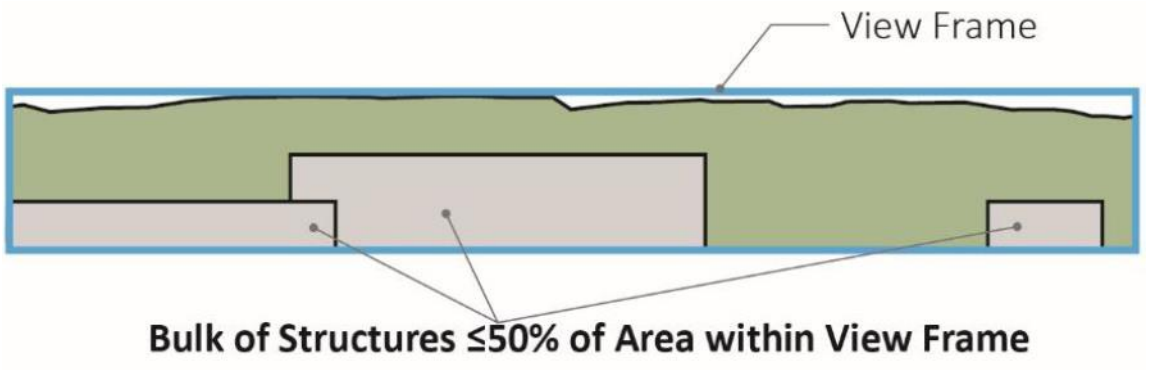
***Bulk Analysis-View Frame (correctly based on sight lines)***

3-6(D)(3)(b) View Frame

A vertical rectangular frame drawn perpendicular (i.e. 90 degrees) to a given sight line through the highest point of the proposed building. The tope of the view frame is established by the highest visible point of the Sandia ridgeline within the view frame. The bottom of the view frame is the elevation of the Coors Boulevard right-of-way where the sight line begins. The left and right edges of the view frame are an upward projection of the property lines at the site boundary where the view frame intersects the property lines. As many view frames as necessary to capture all the sight lines on a site are required (see figure below).




3-6(D)(5)(b) Not more than 50 percent of the area within any view frame for a property shall be obscured by the bulk of the structure(s) (including walls and fences) placed on the property (see figure below).



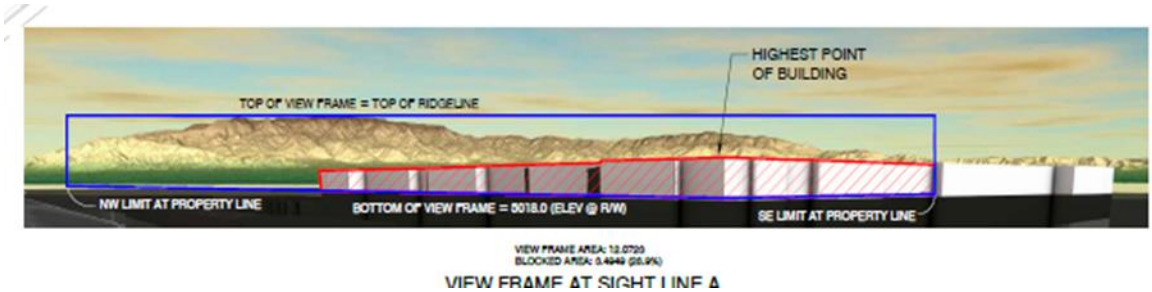




Figure 4: Applicant's View Frame

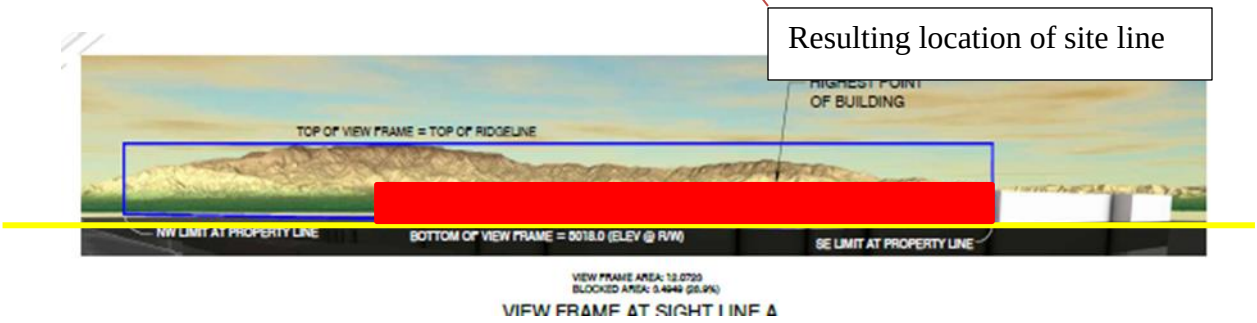



Figure 5: View Frame with straight lines

***The applicant's proposed building heights are 35'-37' to the top of the parapet with minor***

***2' undulations. The highest structure height is 39'-0" along the eastern property line.***

***The applicant's View Frame in the above illustration is determined by using a site line that runs from the Coors right-of-way at a 45-degree angle towards the Sandia Mountains and passing through the highest point of the building, thus showing the greatest obstruction caused by the building. That resulting site line location is approximately 70 feet to the south of the site's southern boundary.***

***The applicant's View Frame is then configured showing all of the building above the elevation of the Coors right-of-way at the beginning of the Sight Line, this being the bottom of the frame, the top of the highest peak of the Sandia's forms the top line of the frame, and the sides representing the property line.***

***The View Frame should result in a 'slice' of the building mass at one frame location. More are required. The View Frame provided by the applicant (figure 4) shows the building with a tapering roof line as in perspective. This should not be the case. The building height should be at a straight height (figure 5). Although the building does not appear to exceed the 50% Mass/Bulk limitation in this one view frame, the applicant should submit a more accurate drawing of each View Frame to accurately represent bulk and massing.***

***The Sight Line the applicant used for the View Frame was along a portion of the building with an additional 2-foot parapet wall at the far northeast corner of the largest building. The location of this added parapet height appears to be arbitrary and does not correspond to any rooftop equipment screening, elevator tower, or architectural features. It is located at one of several entrances to the building; however, each of those entrances has a 2-foot parapet at a height of 37', which would be appropriate for this location as well, rather than the 4-foot parapet. This particular parapet wall location, adjacent to the 2-story portion of the building, further brings into question the purpose of this additional parapet height other than to create a single high spot for the sole purpose of benefiting the applicant's view analysis.***

***This one View Frame provided is based on this small area of additional height. As demonstrated with the View Plane analysis, the building exceeds the acceptable 1/3 view plane penetration. The removal of the 39' height area then requires additional View Frames per IDO section 3-6(D)(3)(a) Sight Lines:***

Lines that begin at the east edge of the Coors Boulevard right-of-way and follow a 45 degree angle to the road alignment, in an approximately northeast direction toward the Sandia ridgeline. Sight lines are required to intersect [all] the highest point(s) of the proposed building(s) on the site..

***and IDO section 3-6(D)(3)(b) View Frame:***

A vertical rectangular... As many view frames as necessary to capture all the sight lines on a site are required (see figure below).

***With the removal of the 39' (4-foot high) building parapet at the northeast corner of the building, there are then two areas of highest building height closer to Coors Blvd, and an addition 3 along the south elevation. There should be one View Frame for each high point.***

***In addition, the Sight Lines should pass through the highest points of all buildings on site. Analysis, as incomplete as it is, has only been provided for one building. No sight line and resulting view frame has been provided for the garages or any of the duplex cottages. A separate sight line for each of the cottages would be unnecessary but there should be one sight line and view frame through the highest point of the building closest to Coors and at the lowest elevation.***

***Without the additional view frames as required by the VPO-1 regulations, compliance of this project cannot be determined.***

## *II. AGENCY & NEIGHBORHOOD CONCERNS*

### *Reviewing Agencies*

**Long Range Planning** Staff note that this is a request for approval of a Site Plan – EPC and Major Amendment to Site Plan – EPC. Long Range recommends that the request be simplified to a Major Amendment to Site Plan – EPC, adding details for the proposed lot as the current phase of the larger development.

### *Neighborhood/Public*

Analysis and concerns from neighborhood groups for the preservation of the view along Coors has generated the continuance of this application. Rather detailed analysis has been provided by those concerned parties and is attached. Elements of that submittal, namely the Bulk/Mass diagrams cannot be confirmed by staff to be accurate.

## *III. CONCLUSION*

The request is for a Major Amendment of a Prior Approval of a Site Plan for an approximately 69-acre property known North Andalucia. Amendments to the plan are for Tract 4, a 7.7-acre site known as the Overture Andalucia, (the "subject site"). Major Amendments are required to be heard by the original, approving body, which in this case is the EPC. Two major changes to the existing site development plan are proposed:

1. 1 Increase in density on Tract 4 from 20 units per acre to 24 units per acre.
    - 155 one and two-bedroom apartments
    - 16 duplex cottages
2. Reduction in parking requirements:
    - Multi-family above 1000 square feet from 2 per unit to 1.25 per unit

- Multi-family less than 1000 square feet from 1.5 per unit to 1.25 per unit

Several neighborhood organizations are affected and were notified as required. Property owners within 100 feet of the subject site were also notified, as required. The applicant conducted three neighborhood meetings. The greatest concern for the surrounding neighborhood associations is the protection of the view.

The subject site is along a Major Transit Corridor and in a Premium Transit (PT) area. The request generally furthers a preponderance of applicable Goals and policies and meets most applicable IDO requirements. Criteria for the VPO are not met. Building height is too high and the location of the Sight Line for generating the View Frame is improperly located, since the high point selected will need to be reduced.

***FINDINGS –SI-2020-00356, August 13, 2020 - Site Plan Major Amendment***

1. The request is for a Major Amendment of a Prior Approved Site Development Plan for North Andalucia at La Luz ("prior approval"). The property contained within the prior approval is legally described as Tracts 1 thru 4, 5-A, 5-B, and 6, Plat of North Andalucia at La Luz, containing approximately 69.6 acres.

2. The proposed amendment will facilitate the development of senior independent living on Tract 4, North Andalucia at La Luz, containing 7.7061 acres ("subject site"). North Andalucia at La Luz is located on the east side of Coors Boulevard NW, south of Montano Road NW.

3. The subject site is within the larger North Andalucia at La Luz development located on Antequera Road NW south of Mirandela Street NW. Coors Boulevard forms the western edge of the subject site.

4. The request consists of the following major changes to the existing, governing site development plan:
    1. Increase in density on Tract 4 from 20 units per acre to 24 units per acre.
        - 155 one and two-bedroom apartments
        - 16 duplex cottages
    2. Reduction in parking requirements:
        - Multi-family above 1000 square feet from 2 per unit to 1.25 per unit
        - Multi-family less than 1000 square feet from 1.5 per unit to 1.25 per unit

5. The request exceeds the thresholds for a Minor Amendment, and therefore is being considered pursuant to Section 14-16-6-4(Y)(1)(b)1, which states that Major Amendments shall be reviewed and decided by the decision-making body that issued the approval being amended. The EPC approved the existing site development plan for the subject site prior to effective date of the IDO.

Pursuant to IDO Section 14-6-4(P)(2), the decision-making body may impose conditions necessary to bring the application into compliance with the requirements of this IDO.

6. The subject site is located in an Area of Change as designated by the Comprehensive Plan. Located along Coors Blvd. the subject site is along a Major Transit Corridor.
7. The Albuquerque/Bernalillo County Comprehensive Plan (ABC Comp Plan) and the Integrated Development Ordinance (IDO) are incorporated herein by reference and made part of the record for all purposes.
8. The subject site is within the Coors Character Protection Overlay Zone, CPO-2 and meets the CPO requirements for setback from Coors, exterior lighting, signage and landscaping.
9. The subject site is within the Coors View Protection Overlay, VPO-1. The purpose of the View Protection Overlay (VPO) zone is to preserve areas with unique and distinctive views that are worthy of conservation, such as those from public rights-of-way to cultural landscapes identified in the ABC Comp Plan, as amended.
10. Staff used the criteria in the VPO-1, as presented in the IDO, and found that the proposed buildings block views beyond what is permitted in the IDO. Building height exceeds 1/3 of total height above view plane and the applicant's View Frame diagram is not accurately drawn.
    A. The applicant limited their submitted view analysis to a single Sight Line that only accounts for a view form a point that is 70 feet south of the site's southern property line.
    B. The Sight Line was generated from a small portion of the building, furthest from Coors, Pulling the bottom of the View Frame higher and showing less of the building mass.
    C. This higher parapet used to generate the Sight Line is not justified by a significant entrance, utility screening, elevator equipment, or other element in need of the added height. It is also adjacent to a 15-foot drop to the north where the building is two-stories.
    D. The Coors Blvd roadway and the subject site both slope downward from south to north, so multiple Sight Lines are needed to provide an accurate view analysis.
    E. The IDO requires a sight line be drawn through the highest point of proposed buildings on the site and that as many view frames as necessary to capture all the sight

       lines on a site are required.
    F. No sight lines have been drawn through the garages or cottages, nor are these buildings included in a view frame.
    G. IDO definition of View Plane (A view plane 4 feet above the elevation of the east edge of the east driving lane on Coors Boulevard and extending horizontally above sites located east of Coors Boulevard.) refers to 4 feet above Coors and refers to the entire site.
        1. The View Plane shown in this application is from a point above the project building;
        2. The View Plane should be taken across the site at 4 feet above the elevation of the east edge of the east driving lane on Coors Boulevard and extending horizontally.

Since the elevation of Coors Blvd. is sloping, the View Plane should be sloping, or for simplicity, multiple lines must be drawn from various elevations. The building design exceeds the 1/3 of building height allowed to penetrate the View Plane in all but the south end of the main building and the small duplex units to the north.

11. The applicant notified the La Luz Landowners Association, Westside Coalition of Neighborhood Associations, and Taylor Ranch NA as required. The applicant also notified property owners within 100-feet of the property boundaries as required. Facilitated meetings were held with some changes recommended being incorporated in the final design submittal.
12. The applicant conducted two facilitated neighborhood meetings on April 22, 2020 and June 29, 2020. Most of the concerns focused on the building heights and VPO-1 encroachment.
13. As of the writing of this report, planning staff has received three detailed submittals with concerns about the accuracy of the applicant's view analysis.

***RECOMMENDATION - SI-2020-00356, August 13, 2020***

**DENIAL of Project #2020-003658, Case # SI-2020-00356, a Major Amendment to an existing Site Plan for an approximately 68-acre site located east of Coors Blvd NW and South of Montano. The specific Tract 4 is further located south of Mirandela Rd and north of Learning, zoned PD, based on the preceding Findings 1-13.**

***Leslie Naji***
***Senior Planner***

# APPLICATION

CONSENSUS PLANNING

# Memorandum

**To:** Leslie Naji, Senior Planner, City of Albuquerque

**From:** James K. Strozier, FAICP, Principal, Consensus Planning, Inc.

**Date:** July 31, 2020

**Re:** Overture at Andalucia View Analysis Response

We are in receipt of the additional view analyses completed by the neighbors, Rene Horvath and Pat Gallagher, and by staff. The purpose of this memo is to provide a response to those view analyses, and your memo dated July 24, 2020 in particular to explain why we believe our view analysis, which was previously reviewed and supported by City staff, meets the requirements of the Integrated Development Ordinance (IDO) Section 14-16-3-6(D) Coors Boulevard VPO-1.

Staff's reversal on this matter appears to hinge on a new interpretation of the View Plane definition and the associated height measurement standard based on that plane. Based on our meeting with you on July 29, 2020, your analysis utilizes a plane extending away from the Coors Boulevard right-of-way at a 90-degree angle from each separate elevation contour. This is somewhat similar to the analysis that was submitted by Rene Horvath of the Taylor Ranch Neighborhood Association, which showed an analysis done at the southern and northern ends of the proposed three-story building at 90 degrees from the roadway.

The definition of View Plane in the IDO is "A view plane 4 feet above the elevation of the east edge of the east driving lane on Coors Boulevard and extending ***horizontally above sites*** located east of Coors Boulevard (see figure below) [emphasis added]." The figure then shows a plane bisecting a building horizontally on an apparently flat site with a flat roadway adjacent to it. This new staff interpretation that the building height must be measured at each elevation contour along Coors (and at a 90-degree angle) is a radical departure from past practice, even though the definition remains relatively unchanged from the previous Coors Corridor Plan (CCP), and there is no indication from the definition or the associated graphic that the View Plane is intended to slope or step downward based on the underlying topography or that multiple planes are required for each possible elevation along Coors Boulevard. Taken to its most extreme this interpretation is no longer a plane, but morphs into a surface that undulates based on the terrain and slope of Coors Boulevard. We believe it is critical to note that the dictionary definition of a plane is "a flat or level surface" (Merriam-Webster).

In contrast to staff's new interpretation, the language of the definition appears to state that the View Plane must be extended horizontally ***above*** the site itself, which is a flat surface consistent with the graphic. This interpretation is supported by the one change that was made to the definition from the CCP to the IDO and longstanding past practice. The CCP definition for View Plane used to state: "On the east side of Coors Boulevard in corridor segments 3 and 4, a view plane is established at four feet above the elevation at the east edge of the east driving lane. The view plane extends **horizontally at 90 degrees to the easterly boundary of the corridor** [emphasis added]."

The IDO intentionally removed the horizontal extension of the View Plane based on a 90-degree angle from the Corridor and replaced it with a more clear explanation of the plane placed above the sites located on the east side of Coors Boulevard, which is consistent with past practice as will be explained

later in this memo. The slope of Coors itself along the frontage of the site is not part of the consideration needed for the view plane/building height analysis.

Since the plane is clearly a flat surface located ***above*** the project site, the next critical question becomes where you define the "elevation of the east edge of the east driving lane on Coors Boulevard." We believe there are two options for consideration:

1. Based on the graphic associated with the IDO definition for View Plane, the elevation of the roadway at the southwest corner of the project site.

2. Based on historic practice, the elevation of the roadway at the location of the sight line.

The first of these two options, while different from past practice, was the guidance we initially received from staff and is consistent with the graphic in the IDO. That graphic shows a single 4-foot dimension located at the southwest corner of the example property. This is also consistent with the intent and purpose of the view protection regulations to protect views toward the Rio Grande Bosque and Sandia Mountains, which are generally at a 45-degree angle from the roadway. On a theoretically square property, the most restrictive viewing location for a passenger in a car on Coors would be from this corner looking toward the mountains across the bulk of the property. As people drive farther north, less of the project site and fewer of the proposed buildings are in their view field towards the Sandia Mountains.

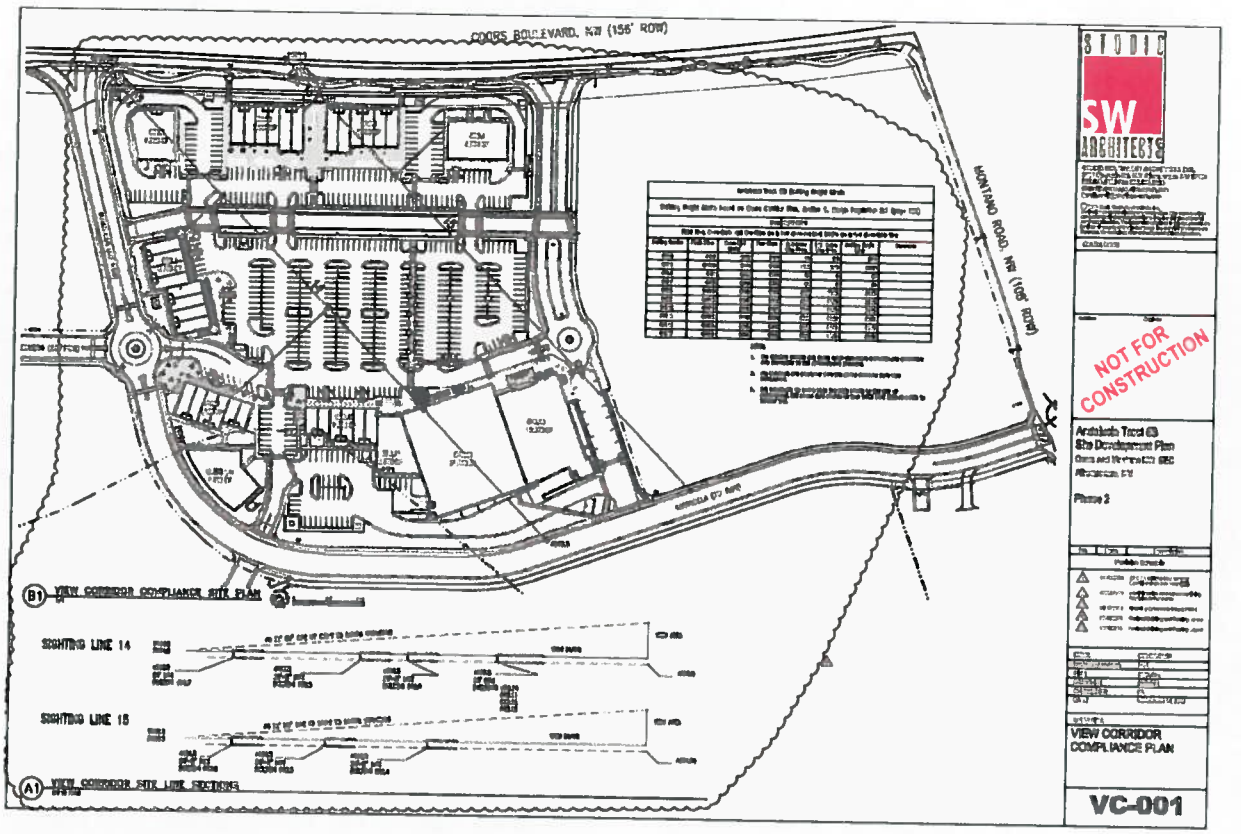
When you consider the impact of either an upward or downward slope on Coors Boulevard, the use of the southwest corner of the property to set the view plane makes even more sense. If the slope is increasing from the southern property line as you travel northward, the impact of buildings on your view northeast towards the Sandia Mountains, will increase. If the slope along Coors Boulevard is dropping, then as you travel north, the impact of the buildings becomes less. While the lower elevations at some point along the property frontage may result in a small portion of a building being above the 1/3 height limitation, the intent of the view regulations are still met because the passenger would need to look farther away and south from the Sandia Crest to perceive any negative impacts. Conversely, on sites where the Coors grade is increasing while heading northbound, utilizing the southwest corner for the height is the most restrictive upon the height of buildings on those sites. As stated previously, this is appropriate because those buildings will have a greater impact on the passengers' views across the property towards the mountain.

**The proposed Overture at Andalucia project meets the height limitation utilizing this first option as shown in our originally submitted view analysis.**

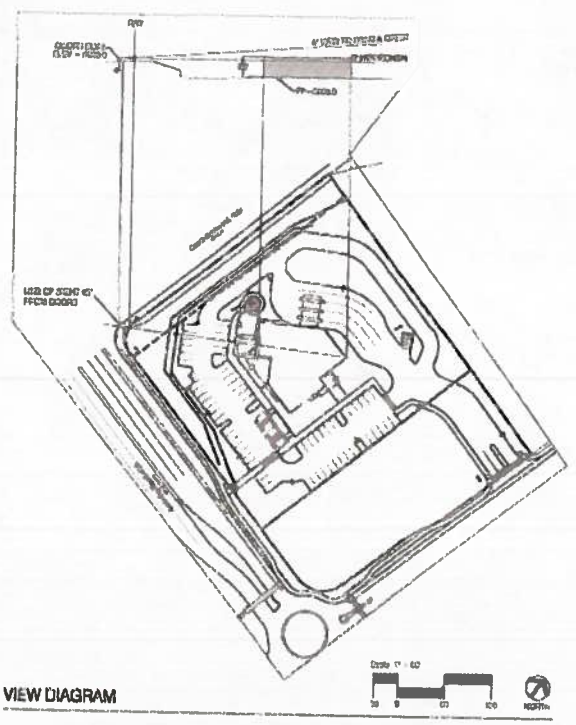
The second option is to base to the View Plane elevation upon the elevation of the roadway where the required Sight Line(s) begin. This method is consistent with the longstanding past practice under the CCP. We reviewed numerous previous approvals along Coors Boulevard, and we will show the three previous approvals for North Andalucia that were all done this way below.

The first one of these previous approvals is the shopping center located north of our project site. This analysis utilized two sight lines with each building tied to one of those lines. It is important to note that the CCP had a graphic that showed pre-determined sight line locations that were utilized for some projects, while not for others. Sight Lines will be addressed later in this memo. For the shopping center, the elevation at each of the sight lines was used to set the View Plane, which was translated to a maximum allowable building height for each building on the property. Because this project used two

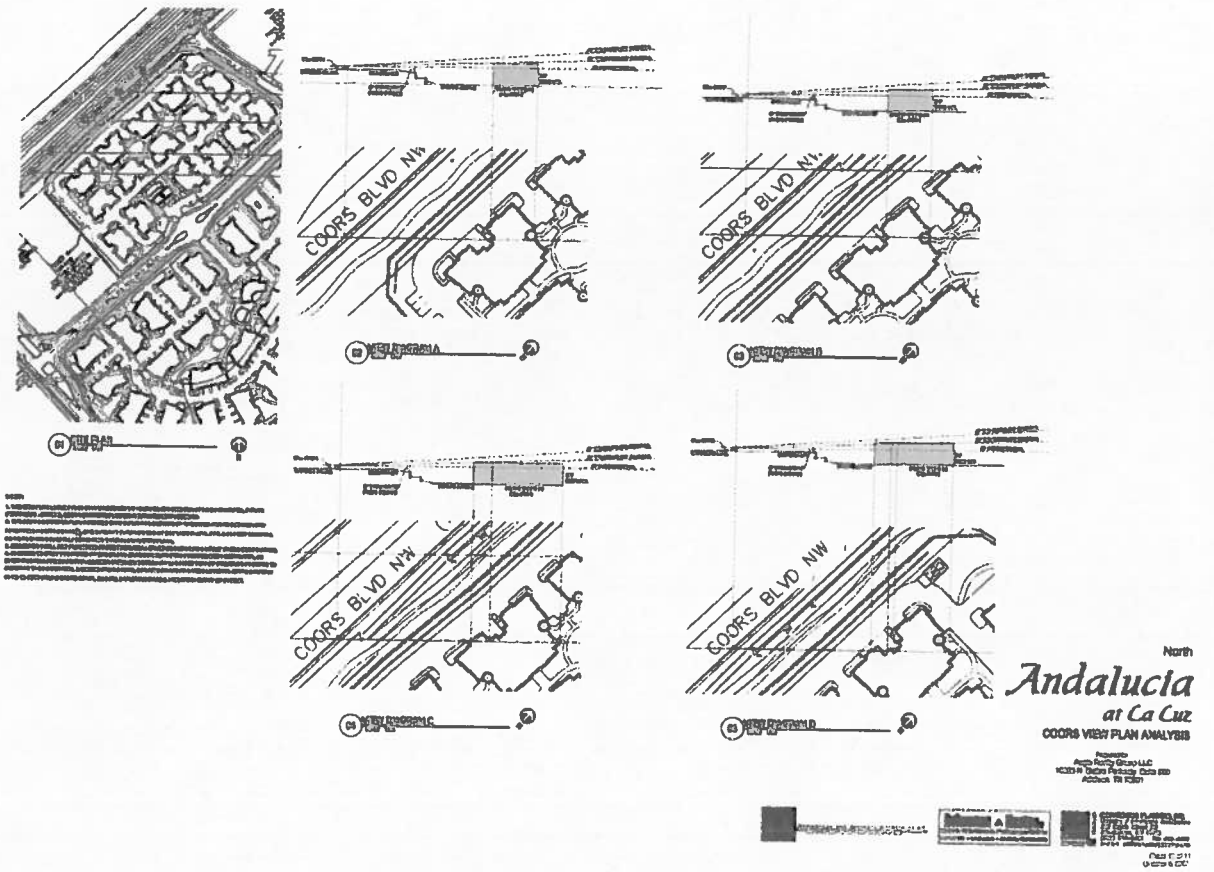
pre-determined sight line locations, the buildings were pulled to the closest sight line even though those sight lines did not intersect each building. That analysis is shown below:




Next, the credit union, located south of our project site, is shown to the right. This analysis included a single Sight Line through approximately the southwest corner of the site closest to Coors, which also bisected the tallest potion of the structure. This single Sight Line results in a single View Plane to measure the building height.



Lastly, the Andalucia Villas apartments site plan, which included the subject property, provided an analysis with four sight lines (one tied to each building adjacent to Coors). This resulted in a View Plane for each Sight Line and the height of each building was analyzed against the View Plane established by the Sight Line associated with that specific building, as shown below.




While there was some minor variation in choosing the Sight Line location(s) among these examples, the positioning of the View Plane above the subject sites was done consistently based on the beginning of the Sight Lines that were chosen. We have also looked at several other site plans approved along Coors in addition to these three, and the View Plane was done in a similar way for all of them. If the buildings shown on these plans were to be analyzed using staff's new interpretation of the View Plane, several of them would likely fail the 1/3-2/3 height test.

As seen in the analysis submitted by Pat Gallagher, his View Plane analysis is consistent with this historic past practice. At the location of our Sight Line on the Overture at Andalucia view analysis, Mr. Gallagher agrees that we pass the tests for compliance with the view protection regulations, including the 1/3-2/3 height test. **Using the start of the Sight Line for the View Plane elevation for the proposed Overture at Andalucia project only improves compliance with the height requirements and could allow a taller building than designed.** Where we disagree with his analysis is where he chose to locate additional Sight Lines, which are arbitrary and ignore the plain language of the IDO defining Sight Lines.

The IDO definition for Sight Lines states: "Lines that begin at the east edge of the Coors Boulevard right-of-way and follow a 45-degree angle to the road alignment, in an approximately northeast direction toward the Sandia ridgeline. Sight lines are ***required to intersect the highest point(s) of the proposed***

***building(s) on the site*** and, ***if the building has no higher point, the lowest elevation(s) of the Coors Boulevard right-of-way*** abutting or nearest the site (see figure below) [emphasis added]." This definition was purposefully changed and updated from the CCP to the IDO. As seen in the historic view analyses earlier, there was consistency in establishment of the View Plane, but each one did something slightly different in determining the Sight Line. The only consistent practice was the provision of a single Sight Line per building. This new definition in the IDO adds clarity to the prior practice and ties the Sight Lines to specific, defined locations (the highest point of the proposed building in this case).

The proposed Overture at Andalucia has one highest point of the building; therefore, only one Sight Line is required through that point. Only if there is no singular or distinct high point(s) is there a requirement to use the lowest elevation(s) of the Coors Boulevard right-of-way. There is no requirement to analyze additional Sight Lines as submitted by Mr. Gallagher.

The neighbors and staff's memo argue that the tallest point on the proposed building was chosen arbitrarily because it serves no purpose and should not count as it relates to the definition. The plain reading of the IDO does not say anything about the highest point requiring a purpose. The word "highest" is defined as "great vertical extent" and the measurement definition in the IDO for building height clearly states that on a flat-roofed building the measurement is to the top of the parapet. Only one section of our parapet rises to the proposed 39-foot maximum height. It should also be noted, that if our "purpose" for locating the highest point of the building in a way to maximize our building height and compliance, we would have located it at the southeastern corner of the building.

Despite not requiring any purpose, as presented at the last EPC hearing, the façade design along Antequera was done to respond to the new site plan layout and building orientation that were changed in response to neighborhood concerns raised at the initial facilitated neighborhood meeting with a desire to increase the street presence along Antequera. These changes in building location also resulted in an improved view analysis as compared to the versions we initially presented and reviewed with staff.

Related to this increased street presence on the east side of the building, IDO Section 5-11(D)(3) for multi-family residential roof design states, "Rooflines longer than 100 feet shall include at least one vertical elevation change of at least 2 feet." We created an increase of 2 feet, which is the minimum allowed and provided the least impact on views. In addition, building entrances are encouraged in the IDO to be emphasized by different colors, materials, porticos, ***roof variations***, recesses or projections, and other building forms. The location of the highest point of the building corresponds to one of our primary pedestrian connections from Antequera to the building.

Finally, based on the required Sight Line(s), View Frames are established for review of the building bulk on the site. The IDO defines the View Frame as "A vertical rectangular frame drawn perpendicular (i.e. 90 degrees) to a given sight line ***through the highest point of the proposed building***. The top of the view frame is established by the highest visible point of the Sandia ridgeline within the view frame. The bottom of the view frame is the elevation of the Coors Boulevard right-of-way where the sight line begins. ***The left and right edges of the view frame are an upward projection of the property lines at the site boundary where the view frame intersects the property lines***. As many view frames as necessary to capture all the sight lines on a site are required (see figure below)."

The definition for View Frame also changed from the CCP to the IDO. The IDO definition immediately cuts the left and right edges of the view frame off where it crosses the property lines and doesn't define which property lines. The CCP stretched from the north to the south property lines and where that was not contained within the project site itself, the north and south property lines and View Frame were

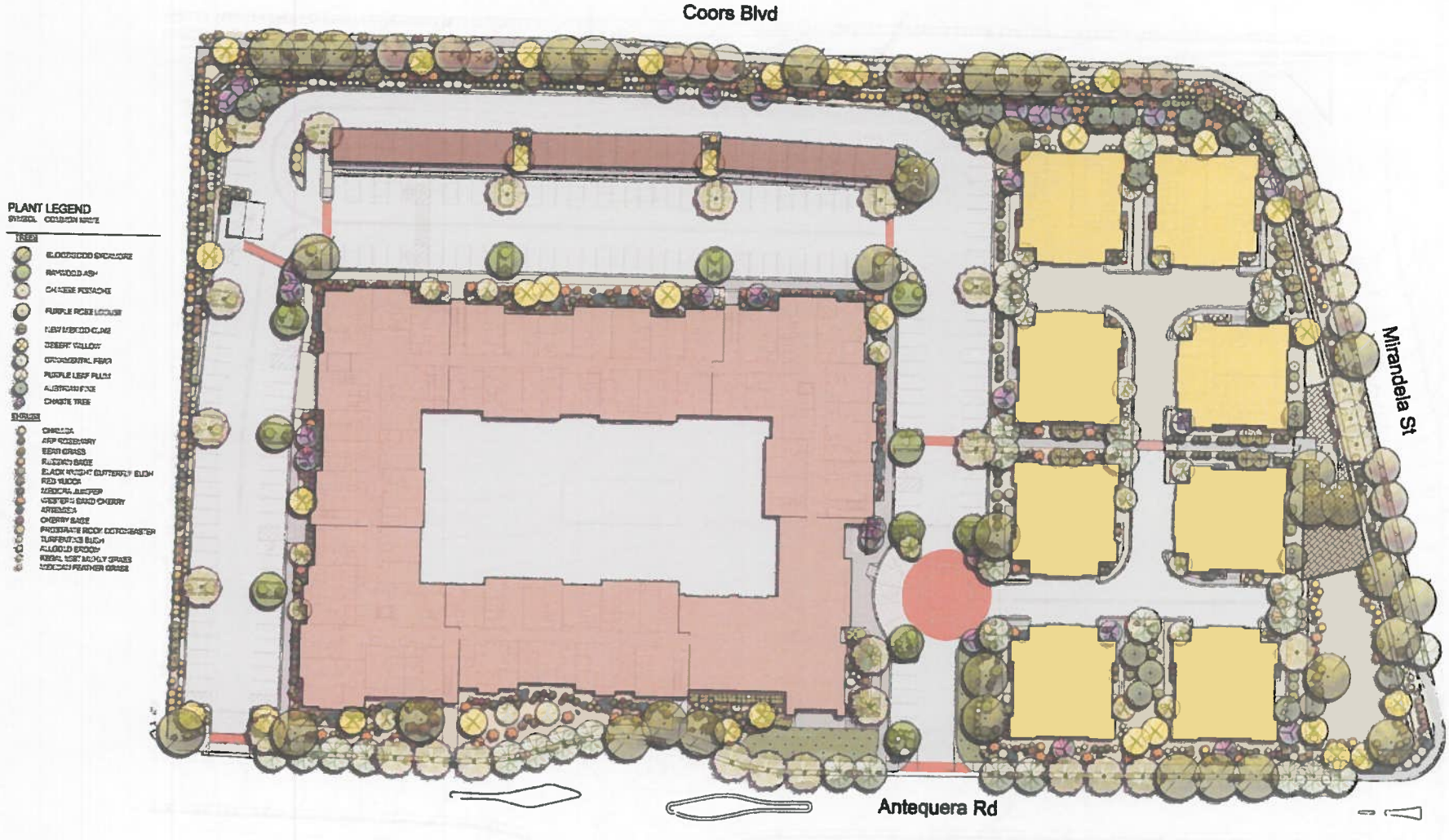
extended to meet each other. The result of this was frequently a wider frame than would be created under the IDO definition. By narrowing the frame, larger, taller buildings inevitably take up more of the View Frame, so this is a critical analysis and the Overture at Andalucia project passes it as shown in our view analysis.

In conclusion, If the view plane is established at the location of the sight line, or as close to the sight line as possible (which is the southwest corner of the property), then the building height, including the highest point is less than and meets the 2/3 1/3 test. This then results in a single sight line as shown on the view analysis. The single view frame, as determined by the sight line and highest point of the building, meets the massing test since it blocks less than 50 percent of the view frame and does not penetrate the ridgeline of the Sandias.

The video presented at the EPC Hearing was meant to show how the proposed building will impact the views to someone travelling north in the east driving lane across the property. While not a requirement, this video clearly shows that the objective of not blocking the view above the main building to the Sandia Mountains and opening up the view as you travel north due to the location of the single-story buildings and the Mirandela roadway corridor, which provide an opportunity for virtually unobstructed views.

The other requirement of the VPO, which does not get the same level of attention is also met with the proposed site plan. The site plan includes several buildings and those buildings provide a variety of building size and massing, the larger building is located farther back from Coors adjacent to Antequera Road (as requested by community members at the first facilitated meeting), and the single story garage buildings are between Coors and the larger building.

We have provided the required View Analysis and based on the definitions and requirements provided in the IDO, this analysis passes the tests required in VPO-1 of the IDO. There are two possible readings of how to set the View Plane and this project passes both, including the more limited interpretation. Only one Sight Line is required through the tallest point. Using that Sight Line, the View Frame is established, and the proposed structures pass the bulk test and do not penetrate above the ridgeline of the Sandia Mountains. Because the proposed project meets the requirements outlined by the Coors Boulevard VPO-2, we respectfully request approval of the proposed Site Plan – EPC.

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# Andalucia Senior Apartments Conceptual Landscape Plan

Scale: 1" = 30'

# NEIGHBORHOOD COMMENTS

**Supplementary Graphical information Related to the Antequera Apartments Project**

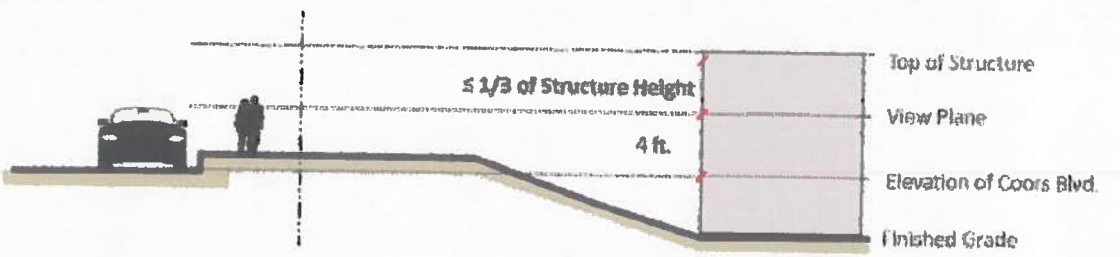
Submitted by Pat Gallagher 7-16-20

The developer, Greystone/Silverleaf, provided the EPC with a view analysis that consists of one sightline and one view point. The IDO places no limitation on the number of view points, but does require enough view frames to assure that the building(s) do not block views. See IDO Part 14-16-3 section 6(D)(3)(a) and (b). The analysis presented here shows the result of investigating four view points with their associated sightlines and view planes for the same project.

Briefly, to conduct these tests, the geography and site plans are combined into a virtual 3D model of the site. From there, tests are run on the model to *quantify* the effect of a future building on carefully defined views. This approach has been largely successful: Many attractive buildings have been built in the Coors view corridor that do not block mountain views.

**Three Tests**

The simplest test is the **1/3-2/3 Test** for a given View Point, Sightline and View Plane. A slice of the building is taken to show the floor and the top of the building in relation to the View Point and associated View Plane. How much of the building rises above the View Plane? The IDO Update 2019, page 130, provides clear illustration. It must be 1/3 or less.

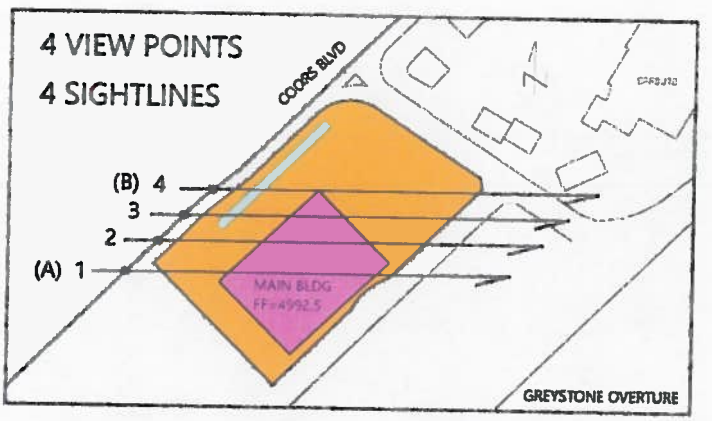



The second test is more involved but gives repeatable, accurate results. **The Mass/Bulk Test** uses the 3D model of the site to "see" how much of the available view is consumed by a building. It must be less than 50%.

The third test, the **Ridgeline Test** is the simplest of the three. Once the 3D model is established, it asks a yes-no question: Does any part of the building protrude above the ridgeline in the view?

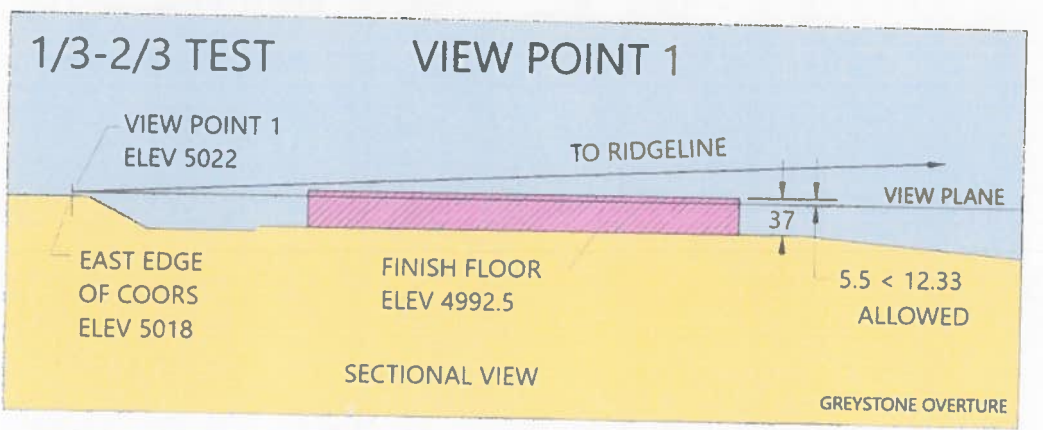
**Four View Points – Four Sightlines – Four View Planes**

With four view points and three kinds of tests, a total of twelve tests were run. To clarify comparison, we will look at each type of test as a group, investigating the four view points.




The above view points were selected in order to fully characterize the site as required by the IDO. See IDO Part 14-16-3 section 6(D)(3)(a) and (b). Since Coors is descending in the area of these view points, it can be expected that we will get different results for each viewpoint.

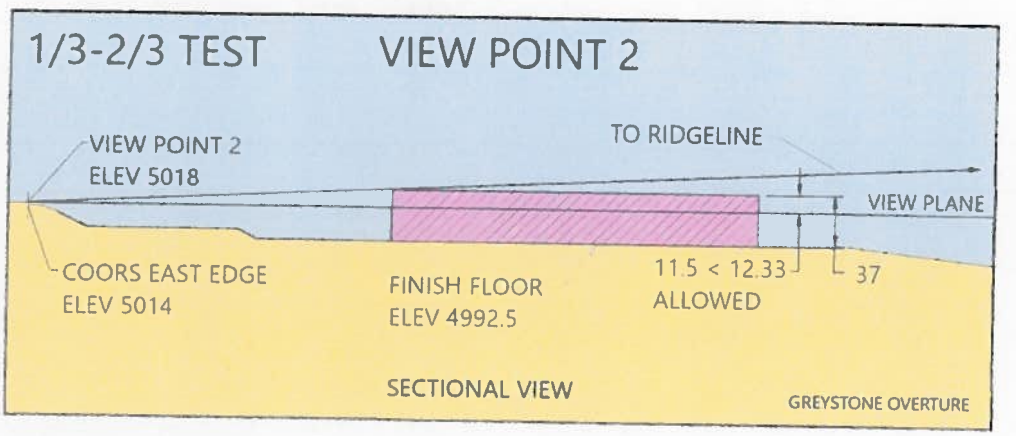
**1/3-2/3 Test - Viewpoint 1**




Shown above is the slice or sectional view of the building (purple) along the vertical plane of the first Sightline. Less than 1/3 of the building rises above the view plane, so this view point passes the 1/3-2/3 Test.

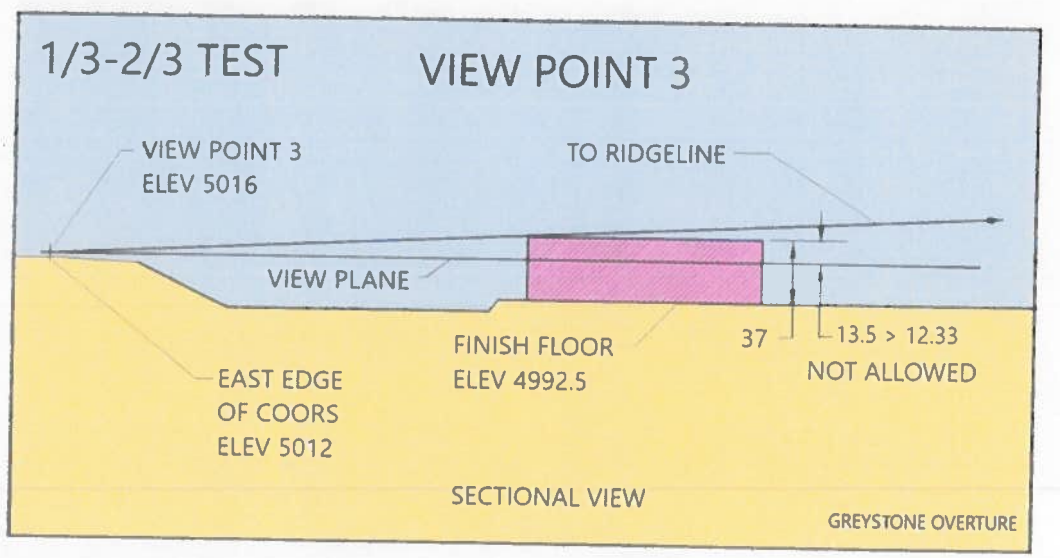
**1/3-2/3 Test - View Point 2**

Moving down the road about 100' for the second view point, the results are slightly different. Notice that the sight line going to ridgeline just touches the building, which means that it may rise above the ridgeline in the Ridgeline Test. For the 1/3-2/3 Test of View Point 2, the building rises 11.5' above the view plane. One third of 37' (building height) is 12.33'. So, it passes this test.




**1/3-2/3 Test - View Point 3**

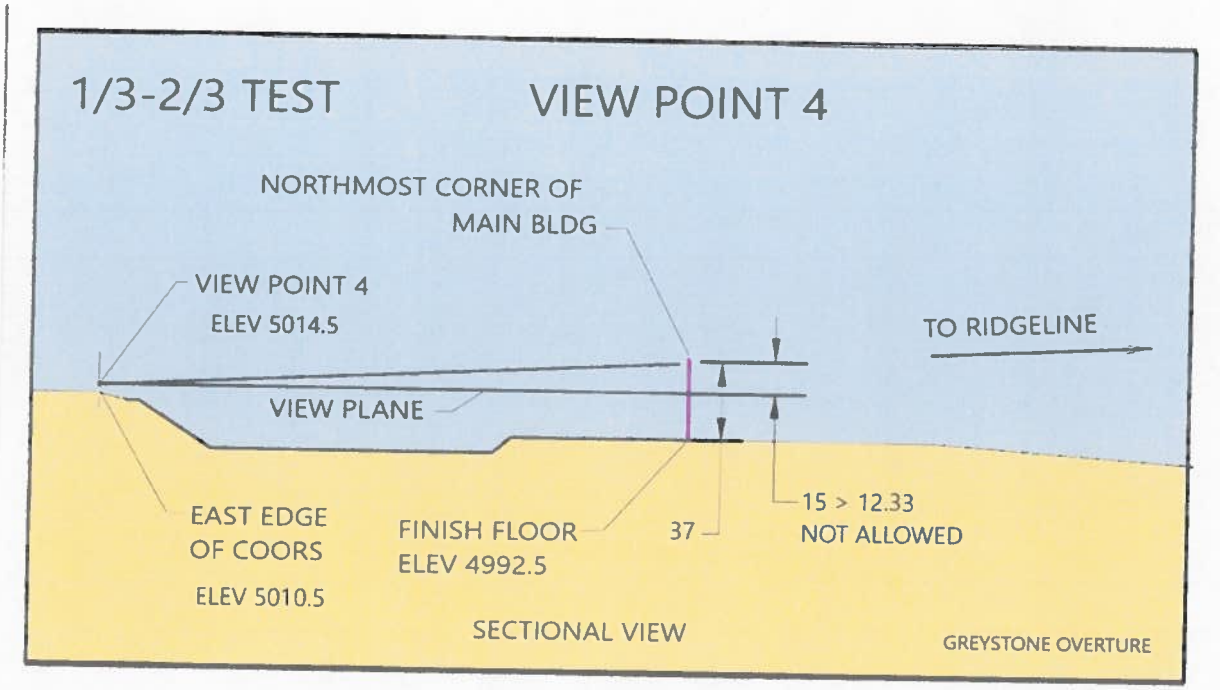
View Point 3 is about 100' north of View Point 2.




Here the top of the building is 13.5' above the view plane. Somewhere between View Point 2 and View Point 3, (about the middle of the west elevation), the building is more than the allowed 12.33' above the view plane.

**1/3-2/3 Test - View Point 4**

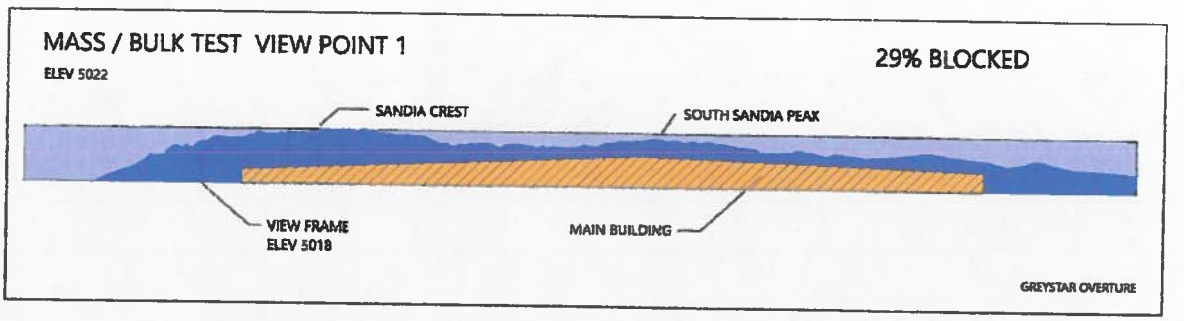
View Point 4 was selected to just catch the northmost corner of the building. This is similar to View Point B in the applicant's supplemental view analysis. The building rises 15' above the view plane or about 2.7' higher than allowed. It also clearly penetrates the ridgeline,



## Mass/Bulk Tests and Ridgeline Tests

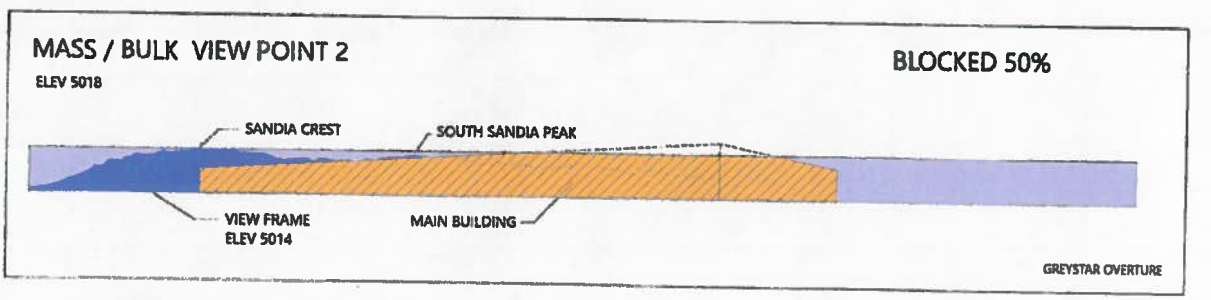
Mass/Bulk Tests and Ridgeline Tests for each of the four view points follows.

### View Point 1



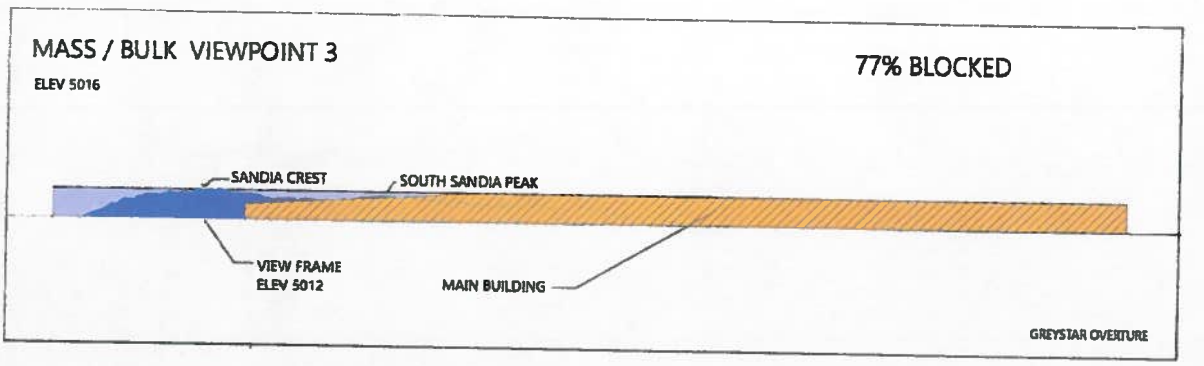

View Point 1 above shows that the building (gold) stays below the ridgeline and consumes only 29% of the view frame. For this view point, the building passes the Mass/Bulk Test and the Ridgeline Test.

### View Point 2




From View Point 2 the building consumes 50% of the view frame which marginally passes. It completely blocks South Sandia Peak and surrounding mountain terrain. It penetrates most of the ridgeline except near the Crest and north.

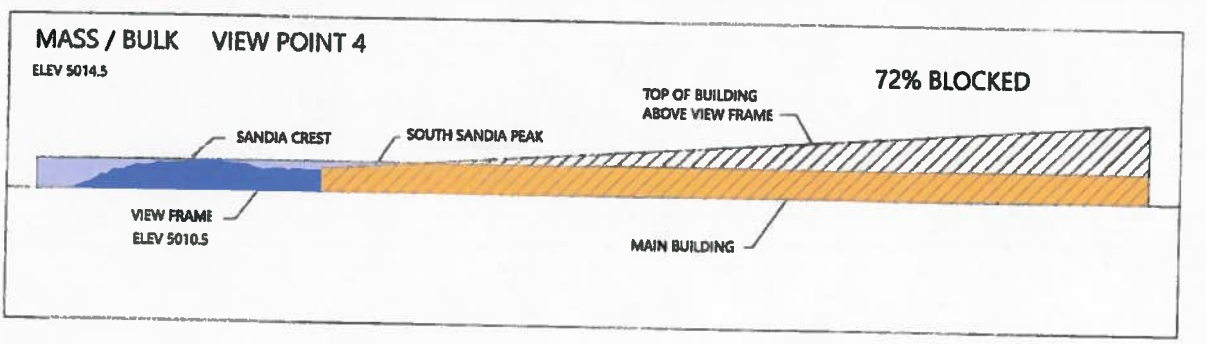
**View Point 3**




View Point 3 shows the building blocking 77% of the view frame. Predictably, it rises above the ridgeline in all but the left 1/5 of the view frame.

**View Point 4**

Finally, View Point 4 which coincides with the north end of the building, blocks 72% of the view frame. It also penetrates the ridgeline similar to View Point 3. The top of the building looms large above the view frame.




**Summary and Conclusions**

When analyzed with consistent IDO definitions, the building fails most of the tests.

| View Point | 1/3-2/3 | Mass / Bulk | Ridgeline |
|---|---|---|---|
| 1 | Pass | Pass | Pass |
| 2 | Pass | Marginal | Fail |
| 3 | Fail | Fail | Fail |
| 4 | Fail | Fail | Fail |

The biggest problem in the building design, as regards View Preservation, is the third story. Slightly north of View Point 2, the third story begins having an effect on the 1/3-2/3 Test and Mass/Bulk Test causing them to fail. The third story fails the Ridgeline test between View Points 1 and 2. It fails completely in View Points 3 and 4.

Conclusion

The third story makes the building too high even when trimmed as it is to 37'. Any likely construction changes in the design would certainly add to, not subtract from, this height.

The subject building is the size of a high school football stadium. It is, in its present design, too large for the site, which is a view preservation zone. This building is suitable for sites that are not encumbered by view regulations.

## Overture Andalucia Apartments – View Plane Analysis of Proposed Three Story Building

The applicant's engineer provided one "View Plane" building height analysis for the entire length of the three story Overture Andalucia Apartments proposed to be constructed on Coors Blvd. The engineer chose their "View Plane" location along Coors in line with the southern edge of the property, which is the highest spot along Coors in front of the building. We selected two more locations along Coors, where we had elevation data, from which to calculate the allowable height of the proposed buildings. In order to perform our view analysis, we needed the elevation of two spots on the pavement located on the east side of the Coors driving lane in front of the building. We used elevation information provided by the applicant in their submission.

We decided to use the known elevations of two grates covering the storm water inlets shown on the plans in the east driving lane of Coors in front of the building as a basis to establish our test locations. One of these grates is located on Coors slightly south of the southern face of the proposed three story structure and the other grate is very close to being in line with the northern face of the building. We ended up using an elevation on Coors as close as we could determine to be in line with the South end of the building in order to perform the "Southern Point" analysis. We chose to use the storm water grate on Coors near the northern end of the building as the basis for the elevation used for the "Northern Point" analysis. This grate is located in the right turning lane next to the curb. Since the driving lane on Coors is slightly west of this northern grate, we adjusted the elevation of the roadway one foot higher than the grate elevation, to compensate for any drop in elevation from the driving lane to the grate. This grate, as far as we can tell using the maps provided, is very close to being in line with the north end of the building. Note: There is a 9 ft drop in elevation between the two grates, but after our adjustments, the decrease in elevation been the two points we chose to use in the analysis was lowered to 7.5 ft. We included illustrations to help show the information we described above. The IDO allows one third of the building height to project above the view plane.

Calculations are below:

| | Southern Point | Northern Point |
|---|---|---|
| Elevation of Pavement in Coor's Driving Lane: | 5013.0 | 5005.5 |
| Adding 4 ft. for driver's height in a vehicle: | 4.0 | 4.0 |
| "View Plane" elevations: | 5017.0 | 5009.5 |
| Minus Finished Floor "Pad" Elevation: | (4992.5) | (4992.5) |
| Portion of Building below View Plane at this Location*: | 24.5* | 17.0* |
| Portion of Building **allowed** above the View Plane**: | 12.3** | 8.5** |
| Total **allowed** Building Height at this location: | **36.8 ft** | **25.5 ft** |
| Building Height proposed by Applicant: | 37.0 ft | 37.0 ft |
| Determine if Proposed Building exceeds allowable Height: | NOT ALLOWED | NOT ALLOWED |

*This figure represents the bottom 2/3rd portion of the Building. It is calculated by subtracting the Finished Floor Pad elevation of the proposed structure from the View Plane elevation along Coors.

**Dividing the results generated above by 2 will provide the height of the top 1/3rd of the building allowed to rise above the View Plane at this location.

The large size of the building, combined with the elevation drop of the roadway in front of the building, severely cuts off views of the mountains and the Bosque that Albuquerque is trying to preserve. Our calculations revealed that the proposed three story building exceeds its maximum allowable height by 11.5 ft (37ft-25.5ft=11.5ft) at the north end of the building and also fails at the southernmost face. The building should be restricted to two stories, which is similar to the existing nearby apartments.

The View Plane analysis on the prior page was calculated from the "Bottom-Up', using the Finished Floor elevation of the proposed structure. Shown below is another way of calculating the view analysis at the same locations from the "Top-Down", using the elevation of the top of the building. This "Top-Down" calculation determines whether a proposed structure complies with the 1/3-2/3 rule while the "Bottom-Up" approach generates useful information as to how high a building is allowed to be at each location.

**Step #1:** Calculate 1/3 of the height of the Proposed Building: 37ft /3 = 12.33 ft.

**Step #2:** Figure out the difference in elevation between the top of the building and the View Plane.

| | Southern Point | Northern Point |
|---|---|---|
| Elevation at the Top of the Proposed 37 ft Building: | 5029.5 | 5029.5 |
| Minus "View Plane" Elevation at each "Point": | (5017.0) | (5009.5) |
| Height of Proposed Building above the View Plane: | 12.5 ft | 20.0 ft |
| **Step #3:** Compare Height of Proposed Building above The View Plane to 1/3 of the Proposed Building Height Calculated in Step #1: | 12.5 ft > 12.33 ft | 20.0 ft > 12.33 ft |
| Determine if Proposed Building exceeds 1/3-2/3 Rule: | NOT ALLOWED | NOT ALLOWED |

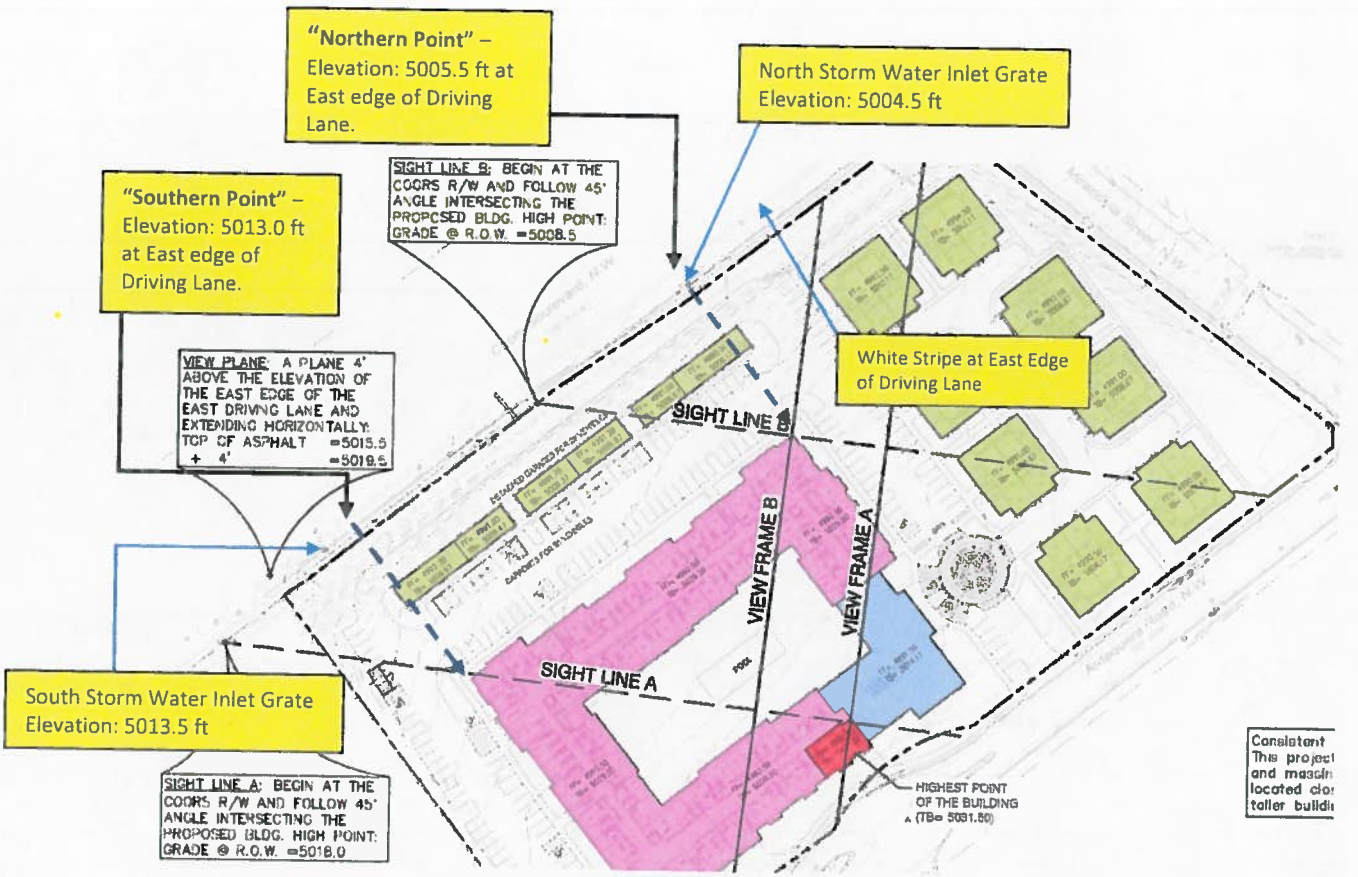
Both methods used to calculate the View Plane analysis showed that the three story building **FAILS** the view analysis tests at both locations, primarily because a three story building is too tall for the site and the Coors roadway drops nearly 8.5 feet in elevation across the face of the building.

Note #1: The View Plane, as defined on page 103 of the Coors Corridor Sector Plan, "Extends horizontally at 90 degrees to the easterly boundary of the corridor". (Page 103, showing this language, is attached). The View Plane illustration in the IDO shows the structure being evaluated along the entire frontage of Coors using a View Plane 4 feet above the pavement on Coors. Utilizing multiple View Plane locations for the view analysis provides a much clearer picture of a structure's impact on the views.

Thank you.
Rene' Horvath
Taylor Ranch Neighborhood Association

Included Illustrations:
A.) Overture Andalucia Apartments Illustration - showing both Storm Water inlet Grate locations and the two analysis "Points" on Coors in line with the Proposed Building.
B.) Addendum – Site Grading Plan – with Annotations
C.) IDO page 121, containing an illustration showing the View Plane along the East side of Coors Blvd.
D.) Page 103 of the Coors Corridor Sector Plan containing directions on how to use the View Plane.

**A.) Overture Andalucia Apartments Illustration - showing both Storm Water inlet Grate locations and the two analysis "Points" on Coors in line with the Proposed Building.**

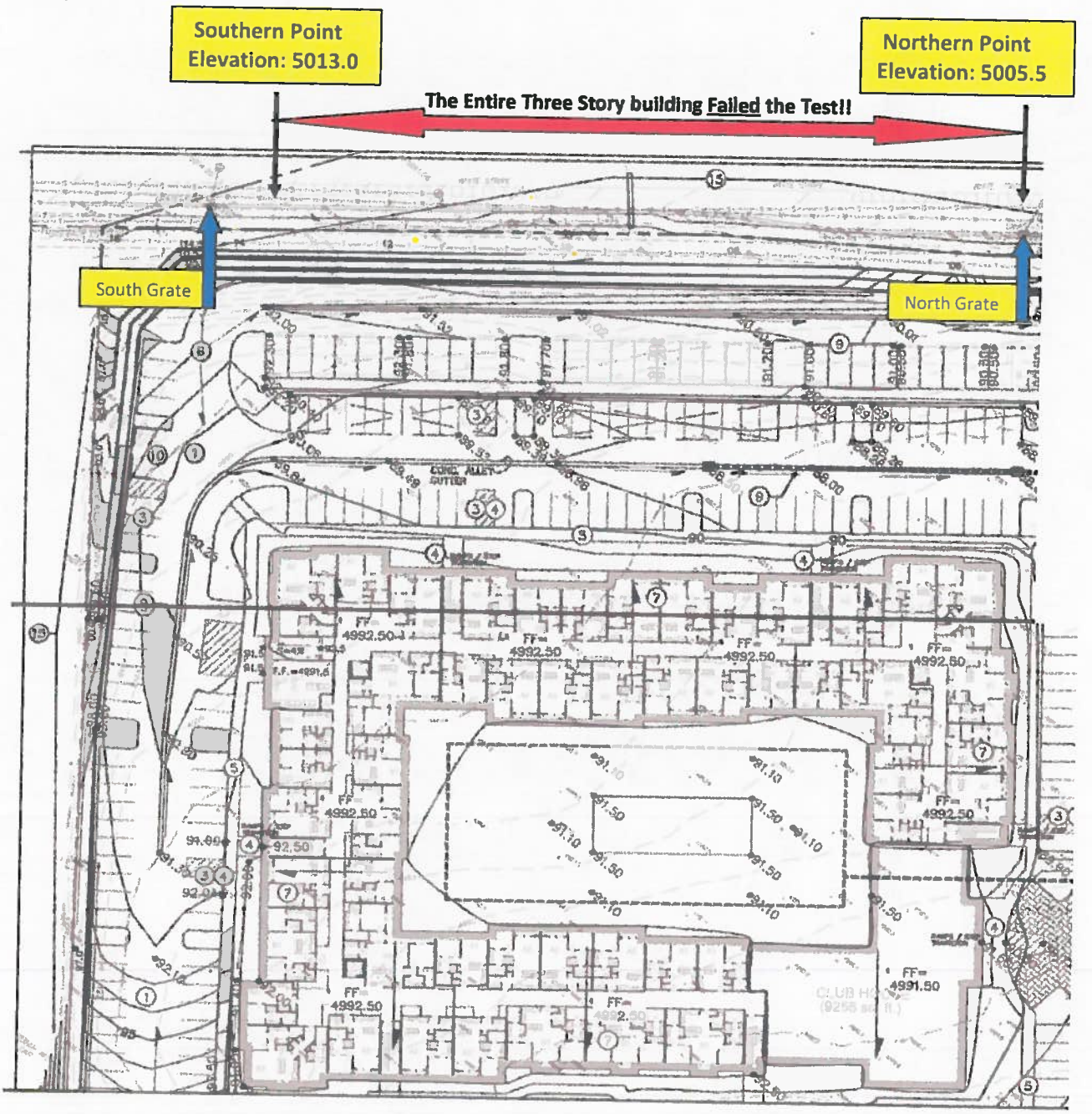



Note #1: The "Northern Point" roadway elevation (5005.5 ft) was estimated to be one foot higher than the elevation of the North Storm Water Inlet Grate (5004.5 ft) because the roadway is designed higher than the grate in order to drain storm water flows into the inlet. It is hard, using these small scale plans that were provided, to exactly determine the elevations, but we are sure that the elevations we are using closely represent the site data.

Note #2: The "Southern Point" roadway elevation (5013.0 ft) was determined by using the contour line crossing the roadway at this location. The elevation seems reasonable considering the "Point" is 25 or more feet north of the Storm drain grate, which has an elevation of 5013.5 ft. and the ground gets lower in elevation as we head north. We chose this spot on Coors because it appeared to line up with the south face of the building. As it turns out, this is where the building starts to fail the View Plane analysis test.

## B.) Addendum – Site Grading Plan - with Annotations

We increased the scale of the site's grading plan (shown below) to reveal the details of the grades along Coors. Elevation 5013.0 ft appears to be in line with the south face of the building. The North Storm Water Grate appears to be in line with the North face of the building. The entire building **failed** the View Plane Analysis!

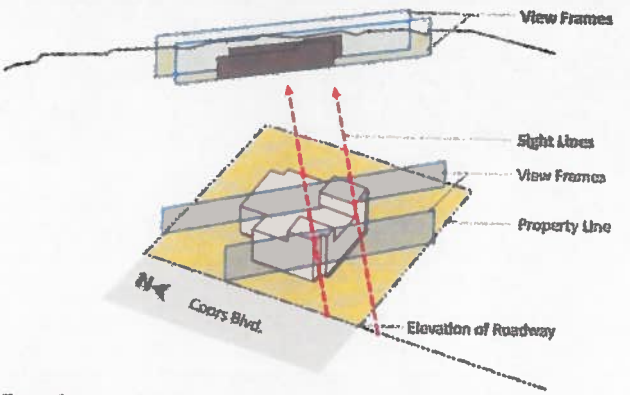


C.) IDO page 121, containing an illustration showing the View Plane along the East side of Coors Blvd.



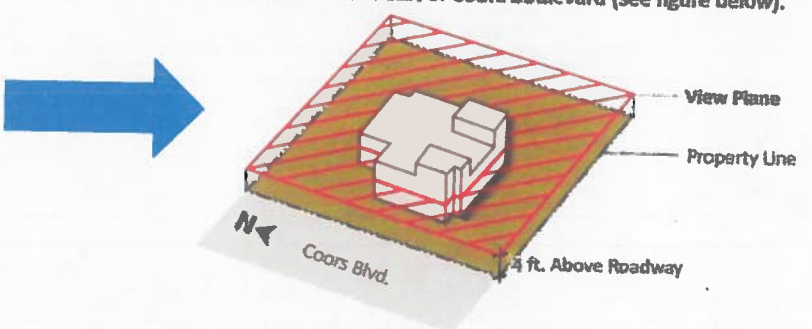
**3-6(D)(3)(b) View Frame**

A vertical rectangular frame drawn perpendicular (i.e. 90 degrees) to a given sight line through the highest point of the proposed building. The top of the view frame is established by the highest visible point of the Sandia ridgeline within the view frame. The bottom of the view frame is the elevation of the Coors Boulevard right-of-way where the sight line begins. The left and right edges of the view frame are an upward projection of the property lines at the site boundary where the view frame intersects the property lines. As many view frames as necessary to capture all the sight lines on a site are required (see figure below).




**3-6(D)(3)(c) View Plane**

A view plane 4 feet above the elevation of the east edge of the east driving lane on Coors Boulevard and extending horizontally above sites located east of Coors Boulevard (see figure below).




**3-6(D)(4) Setback Standards**

Within this VPO-1, the setback standards in Subsection 14-16-3-4(C)(3)(b) (Setback from Coors Boulevard) shall apply for lots abutting Coors Boulevard.

**3-6(D)(5) Height, Bulk, and Massing**

All development within this VPO-1 shall meet all of the following requirements.

# policy 1
# view preservation

Unique views within and beyond the Coors Corridor area in Segments 3 and 4 east of Coors Boulevard should be protected and enhanced in accordance with additional design guidelines for this portion of the corridor.

## rationale:

Views of the natural terrain, the bosque, the Rio Grande, the river valley, the east mesa, and the Sandia Mountains are particularly unique and attractive east of Coors Boulevard in corridor Segments 3 and 4. Site planning and design in this area should be especially sensitive to protection and enhancement of these views.

## definitions:

View Plane: On the east side of Coors Boulevard in corridor Segments 3 and 4, a view plane is established at four feet above the elevation at the east edge of the east driving lane. The view plane extends horizontally at 90 degrees to the easterly boundary of the corridor.

Sighting Lines: Imaginary sighting lines at a 45-degree angle to the road alignment are shown on the View Preservation Maps, Figures 32, 33, and 34 for corridor Segments 3 and 4. The sighting lines indicate the most restrictive viewing angle of the motorist when travelling northbound on Coors Boulevard.

View Area: The view area for a parcel of land is a series of rectangular view frames created by the Coors Boulevard grade level as the bottom of the view frame; the highest point of the ridge line of the Sandia Mountains as the top of the view frame. The north and south edges of the view frame are created by vertical extensions from the north and south property lines of the parcel.* The series of view frames change as the viewer travels north on Coors Boulevard. The view frames are perpendicular to sighting lines. Collectively, the series of view frames is the view area.

*In cases of sites which do not provide adequate depth for the view frame to intersect both north and south property lines, these property lines may be extended until they meet the first possible view frame on the site.

July 22, 2020

To: The Albuquerque Environmental Planning Commission

From: Arlo Braun, 11 Pool Street NW, Albuquerque, NM 87120

RE: **Project #2020-003658**
Tract 4, North Andalucia at La Luz Subdivision
5302 Antequera Road NW, Albuquerque, NM 87120

Dear Chairman Serrano and Commissioners,

I am an interested and concerned neighbor to the Greystar project. I have participated in the facilitated meetings with Greystar and attended the July 9th EPC review meeting. I whole-heartedly encourage the commission to approve the project. I hope the Coors view analyses can be resolved to the commission's complete satisfaction; but short of that, I hope the commissioners can see the wisdom in an observation by Confucius: "better a diamond with a flaw than a pebble without."

Yes, Coors is important; it's a state highway. But it is often disturbing to our neighborhood, especially the loud noise by racing drivers. So, personally, I find it hard to accept that perfect mountain views for Coors drivers might come at the expense of losing a project that is especially appropriate for the Antequera site and for our neighborhood.

Indeed, the project can be a gem. It satisfies the city's objectives of focusing growth near transit, shops, services, jobs, and amenities like the Bosque. It will become a very desirable place to live for people 55 and older; residents who will help support local businesses and add diversity to our neighborhood.

Furthermore, this addition to the neighborhood will add life to Antequera, the street. As an essential connection from our neighborhood to the Sprouts Center, to Montaño, and to the Bosque School, we experience Antequera every day.

After neighbors asked, Greystar replaced parking with apartments lining Antequera to help humanize the street. The City of Albuquerque can make Antequera even better by re-configuring it to complement the Greystar project.

Presently, Antequera is bleak; it is used mostly by cars and trucks. Its pavement is 40 feet wide for only two lanes, a clear incentive for drivers to speed, and a strong disincentive for pedestrians to use. The City would do our neighborhood a great favor by making Antequera into a "complete street,"* a street that would invite equal access for all users – pedestrians, bicyclists, and motorists. This would transform Antequera into a safe, comfortable, and lively place for both new residents and the entire existing neighborhood. A sketch of this idea is attached. The Greystar project, together with

Antequera as a "complete street," can form the gem our neighborhood and the City deserves.

> * Albuquerque's Complete Streets Ordinance defines a Complete Street as: *"A roadway with Cross-Sections (including public right of way and public or private easements abutting a public right of way that are designated for a roadway) built at a human scale, designed and operated for equal access by all users, including pedestrians, bicyclists, motorists and transit riders of all ages and abilities, to allow comfortable and convenient street crossings, and pedestrian access to adjacent land uses. Complete Streets components include, but are not limited to, sidewalks, bike lanes, dedicated bus lanes, comfortable and accessible public transportation stops, frequent and comfortable pedestrian crossing opportunities, median pedestrian islands, accessible pedestrian signals, curb extensions and pedestrian bulb-outs, reduced travel lane widths determined by the design speed of the roadway, context-appropriate curb return radii, roundabouts, or other features that accommodate efficient multimodal travel."*

Respectfully,

Arlo Braun


ANTEQUERA – as a "Complete Street"