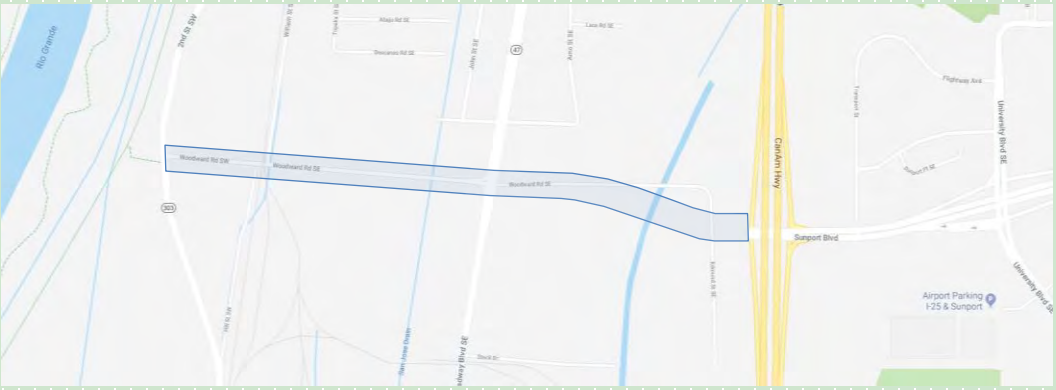
October 2018

Input Synopsis

Sunport Boulevard Extension: Broadway Boulevard to Interstate 25 and Woodward Road Improvements: Second Street to Broadway Boulevard

Control Numbers: A300160 and A300161



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Abbreviations and Acronyms

AASHTO	American Association of State Highway and Transportation Official
AMAFCA	Albuquerque Metropolitan Arroyo Flood Control Authority
BMP	best management practice
CE	categorical exclusion
CFR	Code of Federal Regulations
CME	Construction Maintenance Easement
CN	Control Number
CO	carbon monoxide
County	Bernalillo County Public Works Division
CWA	Clean Water Act
EA	environmental assessment
Ecosphere	Ecosphere Environmental Services, Inc.
EIS	environmental impact statement
EPA	U.S. Environmental Protection Agency
FFY	Federal Fiscal Year
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
I-25	Interstate 25
ISA	Initial Site Assessment
LA	Laboratory of Anthropology
LOS	level of service
mph	miles per hour
MRCOG	Mid-Region Council of Governments
MRGCD	Middle Rio Grande Conservancy District
MRMPO	Mid-Region Metropolitan Planning Organization
MSAT	mobile source air toxic
MTB	Metropolitan Transportation Board
MTP	Metropolitan Transportation Plan
NAAQS	National Ambient Air Quality Standards
NAC	noise abatement criteria
NEPA	National Environmental Policy Act
NMDOT	New Mexico Department of Transportation
NMED	New Mexico Environment Department
NO_2	nitrogen dioxide
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to 10 microns
PSI	Preliminary Site Investigation
ROW	right-of-way
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
STIP	Statewide Transportation Improvement Program
Sunport	Albuquerque International Sunport

SWPPP	Stormwater Pollution Prevention Plan
TIP	Transportation Improvement Program
USFWS	U.S. Fish and Wildlife Service
vpd	vehicle per day

1. Introduction

This document provides a summary of the input received at the public hearing for the proposed Sunport Boulevard Extension: Broadway Boulevard to Interstate 25 and Woodward Road Improvements: Second Street to Broadway Boulevard (Control Numbers [CN]: A300160 and A300161) (together these two undertakings are referred as the Project). The Project is located within Bernalillo County and portions of the City of Albuquerque, New Mexico. The information summarized in this document will be used along with the environmental assessment (EA) for this Project as the basis for the decision by the Federal Highway Administration (FHWA) and New Mexico Department of Transportation (NMDOT) to either: (1) conclude the EA with a Finding of No Significant Impact (FONSI) and authorize the project to proceed to final design, right-of-way acquisition, and construction; or, (2) determine that the proposed project would have significant impacts that require the preparation of an environmental impact statement (EIS) before a final decision is made with regard to Project authorization.

The following information is included in this input synopsis:

- A brief description of the proposed project.
- A description of the methods used, and process followed to circulate the EA to agency and public stakeholders for review and comment.
- A summary of comments on the environmental assessment received from agencies and the public, and the NMDOT's responses to these comments.
- Any changes to the environmental assessment and/or project design features made in response to agency and public comments.
- The final list of commitments and mitigation measures to be implemented as part of the proposed Project.

2. Proposed Project

2.1 Sunport Boulevard Extension

The proposed Sunport Boulevard Extension would consist of a four-lane, median-divided urban arterial roadway, designed for traffic operating at 45 miles per hour (mph), from Broadway Boulevard east to the existing interchange of Sunport Boulevard and I-25. The elevation differential between the interchange and Broadway Boulevard is approximately 120 feet; therefore, the roadway would require a maximum grade of 7 percent. Twin bridges would be built over the existing Albuquerque Metropolitan Area Flood Control Authority (AMAFCA) South Diversion Channel and Edmund Street, which would allow Edmund Street to continue functioning for local access. The roadway would include a combination of retaining walls and fill slopes to meet existing grades.

Two bike lanes (one in each direction) would be included as part of the typical roadway cross section for the Sunport Boulevard Extension. Sidewalks would also be included on both sides of the roadway connecting Broadway Boulevard to the east side of the Sunport Boulevard/I-25 interchange. Curb ramps would be provided

at the intersections along Sunport Boulevard, in accordance with Americans with Disabilities Act (ADA) requirements. The signalized intersection of Sunport Boulevard and Broadway Boulevard would include pedestrian push buttons for full accessibility.

The existing Sunport Boulevard bridge over I-25 was constructed with 110 feet of available roadway width, providing for future traffic growth and added lanes. In each direction within the 110-foot roadway width, there would be two through-lanes, a single left-turn lane, two sidewalks, and two shoulders for bicyclists. The Project would also require modifications to the southbound on- and off-ramps. These modifications are anticipated to consist of adding two lanes to the southbound off-ramp and one lane to the southbound on-ramp and signalizing the intersection to facilitate turning movements and reduce or eliminate traffic queuing. The ramp interface with I-25 would not change. The Project would also require modifications to the northbound off-ramp to add turning lanes and signalization of the Sunport Boulevard intersection with the northbound ramps. The existing traffic island on the southeast corner of the interchange would be modified to allow through-traffic for bicycles on Sunport Boulevard. No further modifications of the existing Sunport Boulevard would be required east of the northbound off-ramp.

The Sunport Boulevard/Broadway Boulevard/Woodward Road intersection would remain signalized and include two lanes in each direction except for westbound Sunport Boulevard where the two approaching lanes would become one right-turn lane and one thru-lane, with the thru-lane continuing westbound on Woodward Road. The intersection would include single left-turn and right-turn lanes for all approaches except for the eastbound to southbound right-turn lane, where the outside eastbound lane would serve both eastbound thru and right turning traffic.

Access to properties near the Preferred Alternative would be provided by an at-grade intersection approximately halfway between Broadway Boulevard and the South Diversion Channel. This intersection would serve as a connection with Woodward Road to the north, Edmund Street to the east, and the Arno Street right-of-way (ROW) to the south. The configuration of this intersection consists of a roadway curving from Sunport Boulevard north to Woodward Road and a stub-out connection to the south that would be configured more specifically with input from local landowners during the ROW acquisition process.

The new roadway would include a storm drainage system to collect stormwater runoff and direct it to designated locations. The system would include detention ponds to generally contain stormwater on site, and to meter its eventual outfall to downstream drainageways at levels no greater than current outfalls. Although the specific details of the storm drainage system would be subject to change during final design, one pond of just over 0.5 acre is proposed on vacant land southeast of the intersection of Sunport Boulevard and Broadway Boulevard; another pond of approximately 0.08 acre is proposed north of Sunport Boulevard between the South Diversion Channel and Edmund Street.

Approximately 11.44 acres of property would be required for the Sunport Boulevard Extension; this would include ROW acquisitions and construction and maintenance easements (CMEs). Part of the required ROW is already publicly owned, occupied by a segment of Woodward Road. Land for the new ROW includes part of an industrial facility, a commercial property, currently vacant land, and the existing public ROW. In addition to the

acquisitions of private property, a license agreement with AMAFCA would be required for the 0.74-acre crossing of AMAFCA's South Diversion Channel.

2.2 Design Concepts for the Woodward Road Improvements

Woodward Road is currently a two-lane undivided roadway extending 0.58 mile west from Broadway Boulevard to Second Street, where it ends in a "T" configuration with stop control on Woodward Road. Analysis shows that 2020 and 2040 traffic on Woodward Road can be accommodated with a two-lane roadway section that would operate at an acceptable level of service (LOS) D or better. With the closely spaced intersections at either end of the Woodward Road segment (at Second Street and Broadway Boulevard) operating at or above LOS C, Woodward Road is expected to operate at a LOS C also. This efficient traffic operating level would be expected to degrade at times during long train crossings or train switching operations. A three-lane configuration is proposed to accommodate turning movements from Woodward Road to adjacent properties where there are numerous driveway turnouts. The three lanes would be constructed with two 12-foot travel lanes, a 14-foot continuous left-turn lane, and two bike lanes, plus standard curb and gutter. The Project may include waterline upgrades within the existing Woodward Road ROW. The design would also include sidewalks on both sides of the roadway and a connection to the County's Rio Grande Bosque multi-use trail west of Second Street. A stormwater storage pond is also proposed south of Woodward Road and the intersection of Second Street. An additional 0.83-acre of ROW and CMEs is required for the Woodward Road Improvements.

Based on results of the analysis, a traffic signal would be needed at the intersection of Second Street and Woodward Road to accommodate 2020 and 2040 traffic. Along with introduction of a traffic signal, other intersection geometric improvements are also needed to provide an acceptable level of service. These include a dedicated left-turn lane for westbound-to-southbound traffic and a lane for either left- or right-turning traffic, which would provide an effective double-left turn from westbound to southbound movements. An additional southbound lane on Second Street departing the intersection is also anticipated to be required to receive the two left-turning lanes.

3. EA Distribution and Public Notification Process

Opportunities for public involvement have been provided to obtain input at key milestones since the initiation of the Project in 2010.

- In June 2010, a public meeting was conducted to review alternatives under consideration and inform the public of the National Environmental Policy Act (NEPA) process.
- The initial EA was distributed for public review in September 2011 and public meetings were held in October 2011 and February 2012. Public comments were submitted to Bernalillo County, NMDOT, and FHWA during that period. In response to those comments, the County opted to conduct additional analyses in areas of concern including traffic impacts, environmental justice, air quality, and land use.
- Members of the study team attended a neighborhood meeting in August 2013, and individual and agency correspondence occurred throughout the study process.

- Another public meeting was conducted in September 2013 to review the supplemental technical information and to provide an opportunity for further public input prior to completion of a revised EA.
- In 2015, a revised EA was prepared for the Sunport Boulevard Extension and made available for public review. A public hearing was subsequently held in August 2015 to obtain input on the revised EA. Based in part on the comments received, the FHWA determined that a new EA should be prepared that combined the Sunport Boulevard Extension and Woodward Road Improvements into one Project.

The EA for the current Project was prepared and authorized by the FHWA on May 8, 2018. The public availability of the EA and public hearing were advertised in the Albuquerque Journal on July 1, 2018 and the EA was publicly available for review until July 31, 2018 online at www.bernco.gov/Sunport locations in Table 3-1.

Table 3-1. Locations for Publicly Viewable Environmental Assessment

Location Addresses	
Bernalillo County Public Works Division 2400 Broadway Boulevard SE Albuquerque, NM 87102	Mountain View Community Center 201 Prosperity Avenue SE Albuquerque, NM 87105
Herman Sanchez Community Center 1830 William Street SE Albuquerque, NM 87102	Jack Candelaria Community Center 400 San Jose Avenue SE Albuquerque, NM 87102

Additional community announcements were included in the County's neighborhood e-newsletters, emails to neighborhood associations, and numerous social media posts and tweets. Reminder postcards for the public hearing were sent out 1 week prior to the hearing to approximately 2900 households and businesses located near the Project area. Emails were also sent to individuals and organizations who had expressed interest in the Project in the past. Two television interviews about the Project and hearing were conducted and aired during prime-time news broadcasts. The Albuquerque Journal highlighted the public hearing on the day of the event. Appendix A includes copies of public notification materials.

An invitation for agency comments on the Project was sent to 34 federal, state, and local governmental representative and elected officials on April 20, 2018. Extensive agency coordination was also conducted as part of the previous phases of the Project. Appendix B includes copies of agency correspondence.

4. Public Hearing

The public hearing was held July 19, 2018, from 6:30 p.m. to 8:30 p.m., at the Mountain View Community Center, 201 Prosperity Avenue SE, Albuquerque, New Mexico 87105. Approximately 100 people attended the hearing. Displays, information, and project representatives were available at the hearing starting at 6:00 p.m. to answer questions and discuss the Project with individual members of the public. The presentation started at approximately 6:30 p.m. followed by the formal public comment period. Bill Moya, Hearing Facilitator, introduced the Project study team and described the agenda and ground rules for the hearing. Rodrigo Eichwald, Project Engineer with Bernalillo County, introduced Steven Michael Quezada, Bernalillo County Commissioner. Commissioner Quezada discussed the history of economic development efforts in the area and

expressed his support for the Project. Elias Archuleta, Technical Services Director for Bernalillo County, then described the Project development process and how we got to this point. Peter Hinckley, Consultant Project Manager for AECOM, presented technical information on the Project alternatives, the design of the Preferred Alternative, and the purpose and need for the Project, including the traffic forecasts. John Taschek, Environmental Consultant with Ecosphere Environmental Services, Inc. (Ecosphere), then discussed the key findings of the EA. Elias Archuleta concluded the presentation with a discussion of the options for how the Project could go forward, either a FONSI and authorization to move the Project to final design, ROW acquisition, and construction or a determination by FHWA that an EIS is needed. Bill Moya then opened the public comment period. He stated that verbal comments would be limited to 5 minutes each to allow everybody an opportunity to speak. A copy of the hearing PowerPoint presentation is included in Appendix C.

The public hearing was streamed live on Facebook allowing for real time comments from residents not able to attend the public hearing in person. A link to the video of the hearing was posted on the County's website, www.Bernco.gov, and sent to over 86,000 residents via Nextdoor, a neighborhood social media platform. Thus, the public could view the proceedings after the hearing and make comments up to the deadline of July 31, 2018. A comment form was also provided at the hearing to facilitate written comments at or after the hearing (see Appendix C).

Verbal and written comments received from the public and governmental agencies with County/NMDOT/FHWA responses are summarized on the following pages. Most of the comments are summarized to highlight key points and organized into lists; however, some of the comments are reported in full to ensure that their meaning and intent are properly conveyed. The hearing transcript and all written comments received are included in Appendix D.

5. Public Hearing Comments

5.1 Hearing Comment 1

Nora Garcia, 236 Sunnyslope Street, SW, Albuquerque, New Mexico 87105

a. The Sunport Extension and Woodward Road Project (Project) was implemented for the sole purpose of:
    - increasing the number of industrial businesses in our northern border area
    - allowing additional truck traffic congestion
    - hazardous pollution and more dangerous chemical industries to move in
    - further promotion of businesses such as hot mix and recycle asphalt plants from locating their businesses across from Mountain View Elementary School
    - concrete demolition companies whose dust you can see for miles
    - transloading facilities containing chemical hazards who are allowed to have train tankers to sit on the tracks endangering the community.

b. A safe distance for residences from potential chemical accidents, explosions and release of hazardous chemicals is at least five miles. Yet, you are willing to risk our lives by expanding roadways to accommodate more continually polluting businesses.

c. The Project will mean an increase of large truck fumes from the traffic running on a 24-hour schedule, will further pollute the air for local residents, and subject them to even more respiratory diseases and chronic and fatal illnesses.

d. You talk about how design overlay standards are intended to have a positive influence on development patterns and enhance the character of the industrial area and adjacent communities. However, what we see is not about enhancing the character of our communities, rather it is about assuring financial gains for the few in the county at the expense of the health and wellbeing of the many low-income, minority residents living in San Jose and Mountain View.

e. Since the concerns of Mountain View and San Jose have not been thoroughly addressed by Bernalillo County, the Mountain View Neighborhood Association is asking for the FHWA to give the Sunport Extension a No-Build Alternative or make the decision for an EIS.

5.2 Hearing Response 1

a. The purpose and need for the Project does not include any of the conditions identified in this comment and has been well defined in the EA. From its inception, the primary purpose of the Project was to enhance transportation system connectivity and close the gap between Broadway and I-25 adjacent to existing Sunport Boulevard. Also described in the EA, improved access and circulation was considered as a corollary need. “Improved access to potential economic centers…” is a key element of the Purpose and Need. Considerable adjacent vacant land exists in the area where currently only environmental cleanup and heavy industrial uses exist, which effectively has degraded the immediate area and created many of the present undesirable conditions that have been commented on by the public. The access proposed by the Sunport Boulevard Extension would be directly to I-25, which would draw traffic away from Broadway Boulevard and Second Street north of the Project area. The Project is included in local and regional transportation plans that include multi-jurisdictional government oversight.

b. The EA acknowledges that additional development may be encouraged as a result of the new access. This Project cannot change zoning or regulate existing development. The County has expressed its intent to develop design overlay standards that would impose additional requirements above and beyond existing zoning on future development in the area.

c. The air quality models used in developing the EA included a mix of vehicle types, including trucks, and showed minor impacts from transportation on air quality. Future emissions are calculated in the models based on information about the effects of clean air standards on vehicle emissions, as propagated by the US Environmental Protection Agency (EPA), which will become stricter in the future. Future emissions are predicted to be generally lower in the future—even through traffic volumes may be greater. Air quality has improved throughout the urban area over the past 30 years and there have been no violations of the Clean Air Act standards for 20 years. The EA acknowledges future growth may occur including industries that involve air emissions and related permitting.

d. See Hearing Responses 1-a and 1-b above.

e. The FHWA will make the final decisions on whether to proceed with the No-Build Alternative or an EIS.

5.3 Hearing Comment 2

Steven Abeyta, 2419 William Street, Albuquerque, New Mexico 87102

a. I'm where the Sunport Extension is going to be. Past performance is the best indicator to predict future results. The San Jose and Mountain View areas are listed as Environmental Justice neighborhoods. The EA states that we have existing zoning and land use mechanisms to review and regulate development and future overlay standards to protect us. We are saturated with many polluting industries and many protections do not work. When we hear, only good industrial companies will locate in the area, considering our past performance and record, you'll realize more polluting companies are coming and we can't stop it.

b. I'm familiar with the traffic issues affecting all of us, especially those that live in Mountain View. Many of us in this room think we're going to get a faster way home. We're not. The EA says that traffic is going to increase more south of Woodward Boulevard. But guess what, the bureaucrats who are trying to dictate this Project are going to have less traffic going downtown.

c. The Project says we're going to make bike trails to get to work safely. I don't know if you've driven a bike next to a semi traveling at 45 mph, it's not fun, it's not safe, and no one in their right mind is going to walk their baby carriage up the Sunport Extension.

d. Even though our history tells us that there are many environmental issues in the area of the Sunport Extension, they did no laboratory work as part of the Initial Site Assessment (ISA). Somebody just came out, drove around, did a visual assessment, looked at some aerial photographs, and looked at some web results. We need an EIS to be performed.

5.4 Hearing Response 2

a. See Hearing Responses 1-a and 1-b.

b. Traffic forecasts show the Project would relieve traffic on the Rio Bravo Boulevard/I-25 and Gibson Boulevard/I-25 interchanges. Table 5-1 below—Table ??? from the EA—shows a comparison of the Build versus No-Build scenarios with 2040 forecasts. According to these forecasts, with the Project, traffic using the Sunport Boulevard Extension and Woodward Road Improvements to access I-25 would be diverted from the Gibson Boulevard and Rio Bravo Boulevard interchanges. Thus, these interchanges would have more available capacity and less congestion.

c. An additional result of the Project would be to reduce traffic on Broadway Boulevard and Second Street north of the Project because vehicles would have access to I-25 south of Gibson Boulevard via the Sunport Interchange. Consequently, less traffic would pass through the developed residential areas of the San Jose neighborhood on Broadway Boulevard and Second Street, north of the Project. Traffic volume would increase on Broadway Boulevard and Second Street south of the Project as vehicles travel to the new interchange.

Table 5-1. Comparison of Forecast 2040 Traffic—No-Build vs. Build Scenarios

Roadway Segment	No-Build Scenario[1]	Build Scenario[1]	Difference in Volume (No-Build – Build)	Comments
Gibson, Broadway to I-25	21,426	17,024	Decrease by 4,402 (-21%)	Traffic shifts from Gibson to Sunport Extension
Sunport, Broadway to I-25	0	10,992	Increase by 10,992	Attracts traffic to Sunport Extension
Woodward, Second to Broadway	3,841	6,611	Increase by 2,770 (+72%)	Attracts traffic to Woodward
Broadway, north of Sunport/Woodward	14,780	8,783	Decrease by 5,997 (-41%)	Traffic bound for Gibson shifts to Sunport Extension
Broadway, south of Sunport/Woodward	11,347	12,548	Increase by 1,201 (+11%)	Traffic shifts to Sunport Extension
Second, north of Woodward	10,000	7,864	Decrease by 2,136 (-21%)	Traffic bound for Gibson shifts to Sunport Extension
Second, south of Woodward	12,612	13,776	Increase by 1,164 (+9%)	Traffic shifts to Sunport Extension
Rio Bravo, Broadway to I-25	42,069	39,626	Decrease by 2,443 (-6%)	Traffic shifts from Rio Bravo to Sunport Extension

[1] Average daily traffic (vehicles per day).

Pedestrian and bicycle facilities are currently inadequate in the immediate Project area. Broadway Boulevard, Second Street, and Woodward Road do not contain sidewalks or adjacent trails. The Metropolitan Transportation Plan (MTP) includes planned pedestrian and bicycle facilities along Woodward Road from Broadway Boulevard to Second Street and a network of proposed bikeways or trails along the Albuquerque Riverside Drain, Second Street, the San Jose Lateral, and the AMAFCA South Diversion Channel. East of I-25, on-street bike lanes and either a multi-use trail or sidewalks are planned on University Boulevard between Rio Bravo Boulevard and Gibson Boulevard. The Project would provide east-west connectivity for the pedestrian and bicycle system along Woodward Road and the Sunport Extension in conjunction with these facilities.

The Project pedestrian and bike facilities are designed with safety features. Sidewalks and bike lanes or multi-use trails would be included as part of the typical roadway cross section for the Sunport Extension. The multi-use trails would be separated from the driving lanes by concrete wall barriers. Curb ramps would be provided at the intersections along the Sunport Extension, in accordance with ADA requirements. The signalized intersection of Sunport Boulevard and Broadway Boulevard would include pedestrian push buttons for full accessibility. On Woodward Road, bike lanes and sidewalks would be provided on both sides of the road and a connection would be provided to the Rio Grande Bosque multi-use trail west of Second Street.

d. The standard approach for NMDOT and FHWA Project construction within potentially contaminated areas is to move forward in stages from the ISA level, which evaluates existing data, to more detailed investigations that typically involve sampling and testing. These investigations define the specific characteristics of contamination, if it exists, and provide remediation strategies (NMDOT, Environmental Geology Bureau. March 2010. Hazardous Material Assessment Handbook). As the design proceeds, detailed plans would be developed to mitigate and avoid any risks associated with contamination. Avoidance of wells and other infrastructure associated with the groundwater remediation systems would be implemented as part of the final design and construction. Coordination has been ongoing and would continue between the County, New Mexico Environment Department (NMED), EPA, and responsible parties. (More information on hazardous materials is included in later responses.)

5.5 Hearing Comment 3

Esther Abeyta, 2419 William, SW

a. The purposes of the proposed Project (transportation system connectivity, improved access and circulation, balance traffic volumes and congestion relief, multi-modal transportation, and emergency vehicle access) are (not) enough reason to justify a change in the characteristics and quality of life of the residents of San Jose for many decades. This road Project is only going to increase truck traffic; the EA states heavy trucks are more likely to use the proposed new interchange instead of local streets, but "more likely" is not a guarantee that heavy trucks will use the proposed road extension. The community is exposed to idling trains and noise from train activity and exceeds the city ordinance. Particulate matter from two idling trains in the community of San Jose are compared to a freeway in Los Angeles. Volatile organic compounds smell of chlorobenzene and sulfurs. San Jose resident are exposed to polluting industries that surround the community.

b. The analysis in the EA that implementation of the Project would not result in significant adverse impacts is not true. In fact, the Project will significantly impact the community of San Jose and Mountain View by bringing more polluting industries to apply for air permits.

c. Cumulative impacts (all the pollution, noise and traffic from all sources added up together) is too much for a community to bear. We are at the level right now and the Sunport Extension would definitely push us past the livable thresholds.

d. The EA was done for the standard situation; however, the Sunport Extension is not a typical highway project location. The Project is located in a superfund site within a landfill buffer zone that may be leaking and with underground storage tanks and unknown contaminations in the ROW. An EA is sufficient for a typical site. The Project is located in an area requiring an EIS, because it is in a known polluted area and the risks are greater.

e. We also need an EIS because San Jose is an Environmental Justice neighborhood with two superfund sites and more importantly because the Project will severely impact the families of San Jose and Mountain View by bringing in more polluting industry to the area.

f. The San Jose/Mountain View design overlay standards have not been approved by the County. The EA says we have existing zoning and land use mechanisms to deal with unwanted polluting companies. These mechanisms rarely work.

g. This Project is about the environmental legacy San Jose and Mountain View are right now dealing with. The money from the Project should be diverted to Mountain View to add sidewalks, flood control, and repave the streets.

5.6 Hearing Response 3

a. See Hearing Responses 1-a and 2-b. The Project would not affect existing rail operations or industrial development.

b. See Hearing Responses 1-a and 1-b above.

c. According to the Practitioners Handbook: Assessing Indirect Effects and Cumulative Impacts Under NEPA. (ASSHTO 2016), indirect and cumulative impacts must be considered if they are reasonably foreseeable. Impacts that are merely possible, or that are considered "speculative," are not reasonably foreseeable.

d. Cumulative impacts are addressed in the EA only for those resource areas affected by the Project. Impacts to natural and cultural resources are not anticipated. Impacts would also not result in the areas of visual resources, Section 4(f) properties, Environmental Justice, farmland, relocations and ROW, utilities, or construction activities. Although the Project would affect remediation systems for contaminated sites, adverse impacts would be avoided through additional testing and continued coordination with the parties responsible for the remediation systems. Because anticipated impacts are minimal in these areas, there would be little or no cumulative impact with other actions. The analysis in the EA shows that the Project would not cause transportation-related air quality impacts; therefore, cumulative impacts are not anticipated. The Project would create direct noise impacts, which would have cumulative impacts with other environmental noise sources from rail and airport operations and other urban activities. Project-related noise impacts affect a relatively small number of sensitive receptors. Growth in the Project area may also have cumulative impacts with other regional developments in terms of possible changes in travel and land use patterns and neighborhood character. The provision of pedestrian and bicycle facilities within the Project corridor would improve multimodal circulation in the immediate area and provide a needed east-west linkage that would have positive cumulative impacts with the regional trails network.

e. See Hearing Response 2-d.

f. The FHWA's Environmental Justice Strategy identifies three principles of that guide its actions:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

The EA considered Environmental Justice in detail (see Table 5.2) and concluded that the Preferred Alternative would comply with EO 12898 on Environmental Justice. The Project would not have disproportionately high adverse impacts on minority or low-income population groups. Although it has

been contentious, there has been substantial public involvement throughout the Project, inclusive of affected communities. The Project would not deny, reduce, or significantly delay the receipt of benefits by minority or low-income populations. Major Environmental Justice-related concerns, such as induced growth, air emissions from new industry, traffic congestion, and hazardous material contamination, are addressed in the EA and throughout these responses.

g. The Project cannot change zoning or regulate existing development. The County has expressed its intent to develop design overlay standards that would impose additional requirements above and beyond existing zoning on future development in the area. The proposed San Jose and Mountain View overlay is an ongoing County planning process that will provide opportunities for public involvement in the development of guidelines that will apply to land use proposals in the Project area. The overlay planning process is not dependent on the current road Project. The intent of the overlay is to provide a set of design standards that incorporate fundamental design standards regarding, landscaping, building materials, loading and unloading orientation, etc. These are elements to encourage a quality commercial and industrial employment area.

The primary purpose for this Project is transportation system connectivity with respect to all modes of travel. A project to add sidewalks, flood control, and repave the streets would have to be programed by the City of Albuquerque or County and included in the Mid-Region Council of Governments (MRCOG) and/or NMDOT planning processes.

Table 5-2. Compilation of Effects on Environmental Justice Populations

Section of Chapter 4	Potential Impact	Environmental Justice: Are there disproportionately high and adverse effects?
Communities and Land Use (4.13)	The Project would encourage industrial development and contribute to further pollution, increased traffic, and other adverse impacts in adjacent neighborhoods.	No—Land that would be directly impacted by the Project is primarily industrial, vacant, or occupied by groundwater remediation systems, and is situated between the more highly developed residential areas of the San Jose and Mountain View neighborhoods. No displacement of people or relocations would result from the Project. The Project may facilitate and encourage growth in commercial, industrial, and manufacturing development; however, these land uses are permitted by the existing zoning and encouraged in the planning documents for the area. The County is developing mechanisms with the San Jose/Mountain View Design Overlay standards to guide the growth of future commercial and industrial development in the Project area. If this plan is not approved, the present County planning and development approval process would continue to employ existing controls, including public hearing procedures, to guide future development.
Socioeconomics (4.14)	The Project would adversely alter the character and/or cohesion of the San Jose and	No—It is not likely that the Project would have adverse effects on the surrounding communities because the corridor is located largely south of the San Jose

Section of Chapter 4	Potential Impact	Environmental Justice: Are there disproportionately high and adverse effects?
	Mountain View neighborhoods, which include high percentages of low-income and minority populations.	neighborhood and north of the Mountain View neighborhood residential areas. The Project is not expected to create a barrier that would impact daily social interactions, the use of local facilities, participation in local organizations, or involvement in community activities. It would not divide the local neighborhoods.
Socioeconomics (4.14)	The Project would result in increased traffic through residential neighborhoods in the area.	No—Although traffic on Second Street and Broadway Boulevard is expected to increase south of the Project area because access to I-25 would be more efficient, this area is largely industrial. Through-traffic is predicted to decrease on Broadway Boulevard and Second Street north of the Project area in the residential San Jose neighborhood. Heavy truck traffic is more likely to use the new interchange instead of local streets. The proposed Project pedestrian and bicycle facilities would improve multimodal circulation in the immediate area and provide a needed east-west linkage to the regional trail network.
Socioeconomic Conditions (4.14)	The Project may attract additional businesses to the area that have potential adverse health impacts on the surrounding community.	No—Mitigation measures for these concerns include existing zoning and land use mechanisms to review and regulate development and the proposed San Jose/Mountain View Design Overlay standards, which would enhance regulations. Additional businesses in the area may also have positive economic effects, which are generally associated with better community health.
Air Quality (4-10)	Project-related emissions would contribute to air quality impacts from industrial sources, which have been identified by the community as a health concern that disproportionately impacts minority and low-come populations and is not adequately addressed in the permitting process.	No—An evaluation of potential traffic-related air quality impacts shows that the Project would not cause or contribute to CO exceedances of the NAAQS. Cumulative CO impacts with other sources of air pollution would be negligible. The region has historically been in attainment for other criteria pollutants, such as O_3, PM_{10}, $PM_{2.5}$, and NO_2, and besides broad scale strategies contained in the SIP, a need for project-specific transportation control measures has not been established. The EPA's national control programs to reduce MSAT are projected to lower emissions in the future in virtually all locations.
Noise (4.11)	The Project would introduce traffic noise where it currently does not exist and at higher levels than now experienced by low-income and minority communities.	No—Existing noise levels are already relatively high in the Project area and exceed the NAC in some locations. Noise levels would increase slightly for all the receptors with the proposed Project, and approach or exceed the NAC at four individual residential receptors that already experience high noise levels.

Section of Chapter 4	Potential Impact	Environmental Justice: Are there disproportionately high and adverse effects?
Water Resources (4.3, 4.4, 4.5)	The Project would alter water resources to adversely affect protected populations.	No—The Project would not impact surface or ground water, wetlands, or floodplains in a manner that would adversely affect minority or low-income populations.
Biological Resources (4.6, 4.7, 4.8)	The Project would alter biological resources sufficiently to adversely affect protected populations.	No—The Project would not impact vegetation, wildlife, or threatened and endangered species in a manner that would adversely affect minority or low-income populations.
Cultural Resources (4.9)	The Project would impact or alter cultural resources sufficiently to adversely affect protected populations.	No—The SHPO has concurred that the proposed Project would have no adverse effect on any historic property listed, or eligible for listing, on the NRHP, thus would not adversely affect protected populations.
Hazardous Materials (4.20)	The Project would release and expose hazardous materials to protected populations or affect ongoing remediation activities.	No—Although the Project crosses portions of contaminated sites and construction would affect some of the existing remediation system, avoidance, protection, adjustment, and relocation measures have been included as part of the Project. Coordination would continue between the County, NMED, EPA, and responsible parties. Other measures would be included during construction to prevent spills or contamination.
Visual Resources (4.12)	The Project would introduce features that would have visual impacts on protected populations.	No—Although the Project would alter the visual landscape of the area, the proposed bridges and retaining walls would be designed to include aesthetic elements, which may generate a positive visual effect.

Note: CO = carbon monoxide; NAAQS; National Ambient Air Quality Standards; O_3 = ozone; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns; NO_2 = nitrogen dioxide; SIP = State Implementation Plan; MSAT o= mobile source air toxic; NAC = noise abatement criteria; NRHP = National Register of Historic Places; SHPO = State Historic Preservation Officer; NMED = New Mexico Environment Department; EPA = U.S. Environmental Protection Agency.

5.7 Hearing Comment 4

Victor Larranaga, business at 3024 Broadway, SE

We employ 10 to 15 employees, and most of them are from the South Valley. I think this would be a good Project to go with and would be a great asset to the whole community. I hope that we can go along with it and continue to help the South Valley and its people with more jobs and better industry.

5.8 Hearing Response 4

This comment is noted.

5.9 Hearing Comment 5

Roberto Roybal—resident at 2233 Don Felipe Road, SW and President of the Pajarito Village Association and Vice President of the South Valley Coalition of Neighborhood Associations

a. I'm here today to talk in support of my friends and communities in the East San Jose and Mountain View communities and their neighborhood associations. As stated, there's a whole lot of issues that we see going on with this Project. It's nice the assessment mentions Environmental Justice, but what it's going to do is take us further away from Environmental Justice. I also believe that this extension is just going to bring more businesses, more industry down here, more polluting industries and we've got too much of that here in East San Jose, in Mountain View, and in the South Valley entirely. That is against Environmental Justice. It's affecting people of color more and more. And we oppose it.

b. I'm also very concerned that once they do this extension, that it's going to dump all this traffic down into Broadway and Woodward and Second Street. I work downtown, and I drive down Second Street every day to work and back home and the traffic is getting worse. I don't think this road is going to alleviate that traffic. I think it's going to increase traffic, more trucks and more industrial businesses. It's going to increase the pollution, the smells of the petrol chemical companies. And I oppose that.

c. I'm also concerned that this will just be one step to extending the road west across the river and meeting the west side. I've been very active in fighting the Santolina development on the west side and I think this will just be another excuse to help them build the road to that development, which impacts us in the South Valley. And I oppose that.

d. Also, we know that Mayor Keller and the City of Albuquerque has pulled the city's support of the Sunport Extension, so why is the County still trying to push this.

5.10 Hearing Response 5

a. See Hearing Response 3-e

b. See Hearing Response 2-d.

c. There are no plans to extend the Project across the river. The transportation planning process, conducted through the Mid Region Council of Governments (MRGCD) and NMDOT, is available for review by the public through the Metropolitan Transportation Plan (MTP), Transportation Improvement Program (TIP), Statewide Transportation Improvement Program (STIP), and other planning documents.

d. On July 3, 2018, Brandye Hendrickson, FHWA's Acting Administrator, responded to Mayor Tim Keller stating:

> "The Federal Highway Administration (FHWA) does not decide which projects to advance. Instead, we make Federal-aid highway funds available to the State transportation departments by formula. They work with local officials to decide which projects to fund and are responsible for project development, subject to our oversight.
>
> The Mid-Region Metropolitan Planning Organization (MRMPO) has included the Sunport Boulevard Extension Project in its approved transportation improvement program with the longstanding support of the city of Albuquerque. Bernalillo County and the New Mexico

> Department of Transportation (NMDOT) are developing the project. The officials at MRMPO and NMDOT may be able to address your comments."

On July 9, 2018, Gloria Shepherd, FHWA's Associate Administrator for Planning, Environment, and Realty, responded to Julie Morgas Baca, Bernalillo County Manager, informing her that:

> "Acting Administrator Hendrickson advised Mayor Keller to express his concerns about the project to the New Mexico Department of Transportation and the Mid-Region Metropolitan Planning Organization. They are in the best position to address his concerns. "

In their two responses, the FHWA has clearly stated that the Mayor's concerns with the project and his opposition to the project should be brought up through the established and federally approved transportation planning processes. His letter furthermore does not nullify the MRMPO's approvals to date. These approvals include approving the federal funding for both Sunport Boulevard and Woodward Road Improvements. Even though Woodward Road is a City street, there are no City funds included in the Project. The funds in the Woodward Road Project are federal Surface Transportation – Large Urban funds with the local match paid by Bernalillo County. The Mayor's letter also does not rescind or revoke any City Council Resolutions or formal agreements between the City of Albuquerque and the County.

5.11 Hearing Comment 6

Juan Reynosa with Southwest Organizing Project, 211 10th Street, SW, 87102

a. The ISA was done to evaluate the environmental concerns associated with the Project. The ISA was done by surveys with the companies in the area searching databases and doing drive-by surveys. Yet, no actual testing of the soil or water was done in the Project area. No exploratory soil or groundwater sampling or lab analysis of soil waters or otherwise were performed. Thus, the ISA acknowledges that currently unrecognized contamination may exist on the site and the levels of such contamination may vary. It's already been noted that the South Valley Superfund Site, which is right at Woodward, is still in the process of being cleaned up, as is the Schwartzman landfill and Duke City Fueling. It's a ridiculous premise to want to build a highway extension through an ongoing site clean-up. I don't think anything should be built there until the full remediation of that Project has been completed. It's also noted that with Schwartzman landfill there are no designated boundaries. They may still not know what is there yet. With both of these sites, including Duke City Fueling, there were no hazardous tests actually done. I just think this is a very poor way of providing information to the community around hazardous materials, especially since this has been one of the biggest area of concern that the community has continuously brought up and continues to bring up tonight. It seems to be done in a way that purposely assumes there aren't any hazardous materials in the Project area. And within that we're told that they did not find any indicators and they should not assume liability for information that proves otherwise. Their interpretation should not be used as legal opinion, and it's used solely for the three contaminated sites that are noted within the use of Bernalillo County. It seems to me that they're making sure to relieve themselves any of liability regarding their limited hazardous materials assessment, because there's a large likelihood that if actual soil testing was performed, there would be a slew of hazardous materials found. Thus, this EA does not do its job assessing environmental concerns associated with the Project if they're not providing real information on hazardous materials contained within the Project

area. I think that's a lot of baggage and raises a lot of red flags for FHWA, who would eventually approve this Project. I'm assuming there's a lot of extra liabilities involved and cost will increase dramatically.

b. Moving on to the section on Environmental Justice, I find it interesting that none of the 11 potential impacts found on Table 4.6 were shown to have any potential impacts for the Project. I completely disagree with the assessment done earlier that there will be no impacts on this already overburdened community. 11,000 cars coming in right next to your neighborhood and you think there's going to be no air pollution or noise impacts on your community. This report even acknowledges that the Project may facilitate polluting industry and that's exactly what the community has been saying all along. Yet, the County claims the design overlay standards will help mitigate this. But that is not an actual document or a piece of policy yet. It is a carrot hanging in front of people to make it seem like what we're saying isn't going to happen. But I will say that until that is actually a valid document, that's a lie and they shouldn't be saying that as a claim to ensure that what the community has been saying all along won't happen. That's not good enough. Economic growth doesn't mean better public health, so you can't uphold that as better quality of life for a community. So once again, Southwest Organizing Project stands with the community against this Project and it should not be approved.

5.12 Hearing Response 6

a. See Hearing Response 2-d and Written Responses 14-s, 14-v, 14-w, and 14-x.

b. See Hearing Responses 3-e and 3-f.

5.13 Hearing Comment 7

Alfred Volden, resident at 3215 Second Street, SW 87105

I'm a third-generation resident of this area. My family has lived continuously in this area for 115 years. I am a proponent of this Project. I only see positive support that will occur in the area with this Project. It will create jobs and bring clean industry. As an owner of surrounding land, we have implemented restrictive covenants that prohibit noxious uses. This is an economic development area for the County that the entire Bernalillo County can be proud of. It has been blighted and it's time for this area to shine. So, I am a supporter of this.

5.14 Hearing Response 7

This comment is noted.

5.15 Hearing Comment 8

NM State Representative Andres Romero, resident at 4503 Valley Park Drive

Since I was elected to the legislature to serve, in part, the communities of Mountain View and San Jose, I always heard at the legislature that we're short on money for various reasons, and community Projects in particular. When I've gone out to your communities I've asked what projects you prioritize for your areas so that we can make the best of the money that is available. Not once did I hear this Project being a priority for these communities. I also don't understand the benefit to the communities, that has not been made clear to me at all.

One of the stated benefits is congestion relief. However, as has been mentioned, there's going to be increased truck traffic throughout the Project, which can only indicate the use of this road by heavy industry. We have a few projects, one that is ongoing, the I-25 Rio Bravo interchange that is intended to relieve the congestion that us in the South Valley and in these communities feel. The FHWA and the NMDOT have also done a south I-25 corridor study. Part of that study is restructuring and rebuilding I-25 and Gibson. That would also go a long way in reducing the congestion and traffic in our communities. It's also a much more viable project to explore than this Woodward/Sunport Extension. I don't know of any businesses, other than heavy industry, that would want to locate near sites that are being remediated. So in this I stand with a lot of community members from Mountain View and San Jose on opposing this Project and hope that we can get moving on some of the other priorities, like the south I-25 corridor.

5.16 Hearing Response 8

This has been a controversial Project, as evident in the comments. The Project purpose and need are addressed in Hearing Response 1-a. Traffic is addressed in Hearing Response 2-b. Other projects in the area are also important and intended to improve the operation of the transportation network in conjunction with the Project. The types of businesses of businesses that locate in the area are addressed in Hearing Response 1-b and 3-f.

5.17 Hearing Comment 9

Maria Globus, resident at 531 Shirk Lane, SW, Albuquerque 87105

I feel like Mountain View and San Jose are like stepchildren. It feels like you're indifferent to what our felt experience is here. I don't understand why you're bringing in Second Street to this whole thing. I can understand Broadway, if you must. I guess the money is burning a hole in somebody's pocket. But I don't understand the Second Street thing. There's probably some kind of Project in the future that we don't know about, but Second Street is our street. You've taken all kinds of stuff from us. You pollute the air, you've zoned everything so all this heavy-duty commercial business can come in, tremendous pollution, and the danger to us in case of accident. You don't need to do this.

5.18 Hearing Response 9

The Sunport Extension connects to Broadway Boulevard at Woodward Road, which currently extends to Second Street. The Project would increase traffic on Woodward Road by an estimated 2,770 vehicles per day (vpd) in 2040; therefore, improvements to Woodward Road are proposed to handle this traffic. Together, the Sunport Extension and Woodward Road Improvements enhance transportation system connectivity. Traffic on Second Street would increase by approximately 1,164 vpd in 2040 south of Woodward Road and decrease by about 2,136 vpd north of Woodward Road in 2040. The impacts to Second Street include both positive and negative traffic growth. Bernalillo County will monitor the traffic situation on Second Street and consider planning for future improvements when traffic growth dictates.

5.19 Hearing Comment 10

Paul Chavez, resident at 2209 Elm Street, SW

I think this Project should have been done 30 years ago and the reasons are because -- one of the reasons is noise. The off ramp on I-25 to Gibson has been a thorn in our side for 30 years from the trucks using their jake brakes early in the morning, late at night. And not only that, we heard about the environmental -- or the hazardous point. In the '80s there was a gas truck that overturned there on Broadway and Gibson going east. It dumped the gas all the way down Broadway. It went into the sewer next to East San Jose and the fire department, they evacuated the school. The fire department poured water into that drain for 24 hours. A tar truck turned over in that same intersection. Two gravel trucks turned over going west and south on Broadway in those years. Now, it hasn't happened again, but it's real possible. I count the trucks, because I live right on the corner, the northwest corner of the freeway and Gibson. There's 20 to 30 gas trucks that come off that freeway and go back up every day. You're talking about the fumes and the environment for the school, for the kids. The study that they've taken here shows that the traffic is going to increase in the next ten years quite a bit. Is it all going to come down Gibson and down Broadway? It can't. We need this extension, no matter what everybody else says. It's progress, people. Get over it.

5.20 Hearing Response 10

This comment is noted. The traffic forecasts show that traffic volumes would decrease on Gibson Boulevard between Broadway Boulevard and I-25 by an estimated 4,402 vpd or -21 percent in 2040 with the Project.

5.21 Hearing Comment 11

Daniel Chavez, resident at 924 Ross Avenue, SW

a. I ride my bike every day and I always commute south on Broadway and then from there to CNM. People don't realize that when you're biking that it's just as much of a hazard as being in a car, because there's less safety. I think the Project would be a benefit because they would build sidewalks. I am not for riding on the bike lanes on the road because I've been hit three times. I think sidewalks are good for all of us, especially for the children in that area, because there's no sidewalks there right now. Even for transportation to and from the airport it would help. The congestion would go down and also emergency services would be able to access that neighborhood from a different position in the city versus where we stand now. And not only that, it would provide growth for businesses, engineers and electrical people, construction people, they would all benefit from this.
b. I think an EIS is definitely required because there's people that live here. If you're going to build this, have some respect for the neighbors and people that live here, because this is the air I breathe every day, this is the air I wake up to, this is the air I go to sleep in. The businesses that thrive in our neighborhood, I'm not too proud of them either. I'm not too proud of what's been hidden from us and what is hidden still from us. So definitely, care for the environment is required. So I'm for it, but at the same time I think there's respect due to the community.

5.22 Hearing Response 11

a. This comment is noted. Response 2-c describes the bicycle and pedestrian network and proposed facilities.
b. This comment is noted.

5.23 Hearing Comment 12

Rachel Riboni, resident of Mountain View

I don't think that this should be approved as it is. I agree that we need to move forward with progress, but we also have to look at what has been done and what has not been addressed, which is air quality, traffic, safety, and poor planning on Second Street. I live down the road on William. We have a problem with all the trucks and fugitive dust from all the businesses and a lot of contamination in the ground and air, and the noise. And this is what we have to look forward to with this. I think that Second Street was a disaster because that's a beautiful area for the bosque, but now we have all this debris and build up right behind my house, which is on William and Rio Abajo. We have children and we have to consider their health. We have a lot of cancer. We have a lot of problems with breathing. But this has been going on for over 15 years. We got the Railrunner. We got the airplanes. We got the train. We got the traffic, all the diesels. We need to address sidewalks and bike lanes, of course. We have too many contaminates already. I don't agree with this until it's further studied or some of the sites and codes are enforced.

5.24 Hearing Response 12

This comment is noted.

5.25 Hearing Comment 13

Marisol Archuleta, resident at 3615 Big Cottonwood Drive SW 87105

a. I live in the area that is just behind Second Street and Rio Bravo (Rossmoor), an area that wasn't included in this EA, though I know that we will be experiencing the impacts that we do not want. We live in an area where during rush hour traffic Second Street gets backed up going south and people like to cut off onto the side, where there is no sidewalk, and then they cut through my neighborhood and they drive very fast so that they can get onto Rio Bravo and skip all the traffic. This EA says that the traffic is going to increase going south on Second Street. I see this road as making my community more unsafe. I feel like the decision's already been made here.
b. I really wish that people who are hired to do these EAs would actually speak to the people who live in the areas. Our children's schools are located right across the street from industry. We are constantly battling things against our own elected officials that are supposed to be protecting us. And to hear the contractor say that none of this will impact us is infuriating. I don't know how much of my tax money was spent to pay him, but I feel very uneasy allowing that type of report to represent what's really happening in my community.

5.26 Hearing Response 13

a. It is expected that cut-thru traffic in the Rossmoor neighborhood located west of Second Street and north of Rio Bravo would be alleviated with improvements to Second Street. Improvements to Second Street that are proposed with this Project are only those necessary for the widening, channelization, and improvements to the intersection with Woodward Road. Although other improvements are likely needed for Second Street, those would be the subject of other planning and future projects. Although various needs are identified with transportation projects such as this, governmental agencies are financially constrained in what can be built now versus future needs. Transportation improvements are done incrementally since funding is limited. However, improvements to Second Street are not planned at this time due to funding constraints. Installation of traffic calming mechanisms would likely alleviate the cut-thru use of neighborhood streets. Bernalillo County will monitor this situation and consider the installation of traffic calming devices when cut-thru traffic problems become significant.

b. This comment is noted.

5.27 Hearing Comment 14

John Hunter, resident at 221 Rossmoor, SW 87105

Right in the area where this lady just got through speaking, we are impacted with a lot traffic from Second Street. In the afternoon traffic is backed up sometimes clear to Woodward across the tracks on Second Street. My biggest concern though is, why would you build a road for the west side which only goes one block? Then it goes south to Rio Bravo and to Rossmoor, which is going to make Rossmoor a thoroughfare. It's heavy traffic now. And the kids playing out there, if they lose control of their scooter or their bicycle, they'll get run over by speeders. These people come across that ditch on Rossmoor about 60 miles an hour. This Project is going to impact Rossmoor and the Rossmoor addition tremendously unless they build a flyover. So without a bridge this is a useless Project.

5.28 Hearing Response 14

See Hearing Response 13-a.

5.29 Hearing Comment 15

Mark Rudd, resident at 506 Valley High, SW

It's almost a law of urban planning that the more roads you build, the worst the traffic becomes. Plus, every single person in this room knows that global warming is a terrible problem. It's a crisis. The west is burning right now. We have to stop doing what we're doing, which means burning fossil fuel. In all good conscience, the only moral thing to do here is to stop road improvements and build mass transit, especially for an airport. It's ridiculous to keep exacerbating the crisis of global warming. It's a moral problem. No more road improvements. Stop global warming. Got to do it.

5.30 Hearing Response 15

This comment is noted.

5.31 Hearing Comment 16

Angela Vigil, representing Martineztown Santa Barbara and Victory Hills neighborhood

I am here to support the residents of South San Jose. We've worked with Esther for many years. And she's told me about her health problems throughout the years, and it breaks my heart. She's my friend and I watch her suffer.

5.32 Hearing Response 16

This comment is noted.

5.33 Hearing Comment 17

Loretta Naranjo-Lopez, President of Santa Barbara Martineztown Neighborhood Association

I am here to support the community of San Jose and Mountain View. I agree with the previous speaker, if we keep building roads we'll keep getting more traffic. That's common sense. We need to stop building them and really start planning in our communities and looking at the impacts that are already existing for these communities with the polluting industry.

5.34 Hearing Response 17

This comment is noted.

5.35 Hearing Comment 18

Art De La Cruz, resident at 1800 Elena 25 Circle, SW

I wholeheartedly support this Project. I supported it from the first day that I got on the County Commission. And the reason that I supported it is something that's being left out. Environmental Justice is absolutely important, and I am glad to share that and much has been done to mitigate the pollution that occurred historically. What's being left out and one of the reasons that I ran for the County Commission was because of economic justice. Growing up in the South Valley in the 1960s, I saw a time where Isleta Boulevard was an active, vibrant commercial, living community. And if you look back in the short history of about eight years, what do you have now? You don't have any new polluters in the community. Anything that that you consider a polluter was here. Some were here before you were here. But we do have U.S. Foods and Admiral Beverage. I helped negotiate Wagner, on the corner of I-25 and Rio Bravo. What has that meant? What has Las Estancias meant on Rio Bravo and Coors? It has meant shopping opportunities, so you don't have to drive as far, don't have to drive that car and pollute the environment so much. Now let me share with you something that I asked my friends, my neighbors, that do not support this Project. What I will share with you is that you need to be careful of what are

called unintended consequences. Even if you have the ability to shut that Project down, if you ignore the fact that the scientists and engineers have said it's not going to be a negative impact, I will tell you about unintended consequences. Right now there's about a thousand acres that are undeveloped. If you look at those properties, they are already zoned industrial. That is an entitlement. And if you don't allow this Project to move forward, what will happen is that you're going to get, at some point in time, new companies that come in there. And they're very likely to be exactly the ones that you do not want, because that is an entitlement. They have a right to be there. They will be there. But if you open up that corridor and if you look at the County's planning and what the County Development and Planning Department in the past has done, they are after good, clean industrial development. That is what they want. That is what we need for jobs. So, I will tell you that opening up that corridor will open up opportunity for good, clean, smart, not only retail opportunities, but also good, clean industrial. Or consider what you may have the other way by trying to shut it down.

Hearing Response 17

This comment is noted.

6. Written Comments

6.1 Written Comment 1

Sister Joan Brown, osf, Executive Director, NM Interfaith Power and Light New Mexico Interfaith Power and Light, PO Box 27162, Albuquerque, New Mexico 87125, www.nm-ipl.orginfo@nm-ipl.org, 505-266-6966**

a. I write to express opposition to the Sunport Extension into the San Jose neighborhood. The community does not support this Project. They have sent in public comments on at least three EAs. Continuing to pursue this Project in a neighborhood which has so many environmentally polluting businesses and industries poses Environmental Justice and ethical concerns.
b. The air quality in San Jose is already compromised, as is the health of those who live there.
c. In addition, I am confused that this Project is being brought forth since Mayor Tim Keller in May of this year publicly stated that the City of Albuquerque was withdrawing its support for the Sunport Blvd. Extension Project. Why is the County pursuing this Project at the cost of taxpayers?
d. I request that the County close the pursuit of this Project on the grounds of Environmental Justice and cost to taxpayers, when the city of Albuquerque has already stopped this Project from consideration.

6.2 Written Response 1

a. Environmental Justice is addressed in Hearing Response 3-e.
b. Air quality is addressed in Hearing Response 1-c.
c. The Mayor’s letter is addressed in Hearing Response 5-d.
d. This comment is noted.

6.3 Written Comment 2

Nora Garcia, President, Mountain View Neighborhood Association, P.O. Box 19081, Albuquerque, NM 87119-9081, E-mail: ngarcia49@yahoo.com

The Mountain View Neighborhood Association concludes that the Project was implemented for the sole purpose of enhancing the industrial use of businesses in our northern border area, allowing truck traffic congestion to further promote businesses such as transloading facilities containing chemical hazards and allowing train tankers to sit on the tracks with possible faulty release values which could ignite and explode. This is the way we view your design overlay standards intended for positive influence on development patterns and enhancing the character of the area. Yes, for your own financial gain and at the risk of several low-income and minority residents living in San Jose and the Mountain View Area. You know for a fact that a safe distance for these explosions is a distance of five miles minimal. Yet you are still trying to sustain roadways for accommodating these continual polluting businesses while the fumes from these trucks running on a 24-hour schedule are polluting the air quality of the residents and subjecting them to respiratory diseases and illnesses such as asthma, cancer, etc.

6.4 Written Response 2

See Hearing Responses 1-a, 1-b, and 1-c.

6.5 Written Comment 3

John Hunter, 221 Rossmoor SW, Albuquerque, NM 87105, (505) 459-4680, hshmom@comcast.net

a. The extension from Sunport Blvd. and Woodward Rd. will have a very negative impact (without a bridge) on the Mountain View community and neighborhood. Especially the Rossmoor addition. It is supposed to help the west side. But it only goes one block west of the railroad tracks, then it literally goes south. Without a bridge it is a waste of money. It will have a very negative impact on Second Street, Rio Bravo, and the Rossmoor addition. Due to the increase of traffic in the Rossmoor area, people are using this street as a short cut in the mornings and evenings. Wherever people and cars are in close proximity, traffic safety is a heightened concern. We are against the Sunport Extension because people already use our neighborhood as a short cut. If the Project goes thru it is going to have a very bad impact on Second Street and Rio Bravo neighborhoods worse than what it already does. It will be another mess of bumper to bumper cars thru the Rossmoor neighborhood. It will also make it hard for all the people who live here to get in and out of their driveways. Since school is getting ready to start, the school busses will have a hard time getting thru. But most important, it will be very dangerous for our kids at the bus stops. We have already seen people not watch for hem when they started the freeway Project.

b. The Sunport Boulevard Extension is supposed to be good for the west side. But from the railroad tracks to Second Street is only about one block west. Then it literally goes south. It is supposed to be for the west side, but the west side is over the river.

6.6 Written Response 3

a. See Hearing Response 13-a.

b. The Sunport Boulevard Extension is intended to provide another means of access between Broadway and I-25, and it will help distribute traffic that is otherwise more concentrated on Gibson Boulevard, Rio Bravo Boulevard, and other area roads. It will benefit the Southwest Albuquerque area in general with this greater distribution of traffic, providing an alternative to Rio Bravo to some drivers, and thus generating some reduction to traffic on Rio Bravo and indirectly benefiting the west side. However, there are no plans or intention to provide another river crossing at this location.

6.7 Written Comment 4

Connie Martinez, 209 Abajo Road SE, Albuquerque, NM 87102, (505) 843-8462

I feel that we haven't received enough information about this Project. The presentation was very hard to understand because of the wording used. I have lived here since 1967 and we've always been dumped on. There is no benefit for the community. This is very sneaky, and someone has a personal agenda. We do need sidewalks and bike paths but we don't need the traffic and the noise. We already have porta-potty storage, construction waste, and junk yards. We need walls to hide these eyesores and we need government to control development. I oppose this plan.

6.8 Written Response 4

This comment is noted.

6.9 Written Comment 5

Evelyn Costello, 1809 Del Norte SW, Albuquerque, NM 87105, (505) 877-9288, evelyncostello@msn.com

2015 traffic counts indicate there is enough traffic at the Second/Woodward intersection to have a stop light. Bernalillo County should evaluate the installation of a stop light prior to the start of the Project. The increase in westbound traffic on Rio Bravo just causes drivers to seek alternative routes and Second Street is one of those alternate paths to get to Rio Bravo. When turning south on Second Street from Woodward Road there is poor visibility looking north due to a curve in the road. The sooner a traffic light is installed, the safer the intersection will be.

6.10 Written Response 5

The traffic signal recommended in this comment is actually planned to be installed at the intersection of Second Street and Woodward Road with this Project. Due to the need to identify funding, program a project, design the improvements, and to develop engineering plans and construction documents, a faster project would not be possible prior to the Woodward Road Improvements planned with the Project. No new project could be

developed faster than that which is underway already. The design and installation of a new traffic signal where none previously existed is not the type of work that can be performed by County maintenance forces.

6.11 Written Comment 6

Irene Entila, 415 Columbia Drive SE, Albuquerque, NM 87106, (505) 263-4530, ientila@icloud.com

I was initially for both Projects because of adding more bike infrastructure. After hearing the presentation and community comments, I am going to say no to both Projects. It sounds like this Project is going to gentrify the San Jose and Mountain View communities, and that is something I morally cannot support. Plus, more pollution means environmental racism. I am going to go with the no build option and wait for another project to take on bike lanes or revisions to this current Project.

6.12 Written Response 6

This comment is noted.

6.13 Written Comment 7

Gerald Bowe, 216 12th Street NW, Albuquerque, NM 87102, (505) 977-1562, jerrybowe@yahoo.com

This is an important Project to connect the South Valley to the Sunport. It will also provide another connection to I-25 saving commuters time and the movement of goods. It will also bring needed improvements to Woodward Road. And it will also lead to economic development.

6.14 Written Response 7

This comment is noted.

6.15 Written Comment 8

Nan Morningstar, 2022 Edith Blvd SE, Nan and John Morningstar, Owners Free Radicals, 300 Yale Blvd SE, Albuquerque, NM 87106, 505-254-3764, www.FreeRadicalsHQ.com

I am a resident of South Broadway neighborhood. I attended the Public Hearing on July 19th. I am curious about the design overlay standards for the Project. It was mentioned that they are yet to be written. Are they to be a simple zoning overlay or will there be incentives as well? What types of businesses are being kept away and what sort are being courted? I'd like to be kept in the loop.

6.16 Written Response 8

The proposed design overlay standards are addressed In Hearing Response 3-f.

6.17 Written Comment 9

Robert Nelson, resident of Wells Park, robert.nelson.abq@gmail.com

I do not support the Project and I've described below the many points as to why I do not support it.

a. The April 2018 EA prepared by AECOM (URS) and Ecosphere Environmental Service on behalf of Bernalillo County Public Works states:

> "This report is intended for the sole use of Bernalillo County. Services performed during this investigation may not be appropriate for other users, and any use or re-use of this document or of the findings, conclusions, or recommendations presented herein is at the sole risk of said user."
>
> "LIMITATIONS AND EXCEPTIONS: This study was not intended to be a definitive investigation of any potential contamination, which may exist at the subject property. Given that the scope of services for this investigation was limited, and given that no exploratory soil borings, soil or groundwater sampling, or laboratory analyses of soils, water, air or other media were performed, currently unrecognized contamination may exist on the site, and the level of such potential contamination may vary across the site."
>
> "URS does not assume any liability for information that has been misrepresented to us or for items not visible, accessible, or present on the subject property during the time of the site reconnaissance. Unless otherwise specified the tasks included no collection and analysis of samples."
>
> "URS cannot warrant or guarantee that not finding indicators of hazardous materials means that hazardous materials do not exist on the subject site. There is no investigation thorough enough to preclude the presence of materials on the subject site, which presently, or in the future, may be considered hazardous. Because regulatory evaluation criteria are constantly changing, concentrations of contaminants present and considered to be acceptable may, in the future, become subject to different regulatory standards and require remediation. Opinions and judgments expressed herein are based on URS' understanding and interpretation of current regulatory standards and should not be construed as legal opinions."

Writing Point Suggestions

URS (AECOM) and Bernalillo County Public Works Department stating they do not take any liability and responsibility for what is written in the EA. The EA was not intended to investigate any potential contamination on the road Projects. There was no sampling of soil borings, soil or ground water sampling, or laboratory analyses of soils, water, air or other media were performed. Admittedly they only did a visual inspection and web database searches. There is the potential that unrecognized contamination may exist and may vary across the sites located in the road Projects Sunport Extension /Woodward Road. These sites include South Valley Superfund Site and the Schwartzman Landfill.

It is an insult to the people and the environment of San Jose and Mountain View, who have suffered from the nuclear bomb industry, oil and gas industries, metal processing for recycling, unlined waste dumping, chemical industries, and many others that have left a legacy of toxic pollution on the land, air and groundwater--all because an entirely Hispanic community of poor working people cannot afford legal fees to make companies clean up their environmental wastes. For the FHWA to assure that Environmental Justice is properly and adequately considered in the Sunport Extension road Projects the

FHWA should require URS (AECOM) and Bernalillo County Public Work to do a full-scale EIS or give the Sunport Extension a "No-Build Alternative".

b. The EA states the purpose and need for the Sunport Extension is to balance traffic volumes and congestion relief. Better balance traffic volumes on the roadway network by providing another connection from the existing arterial system (Broadway Boulevard and Second Street) to I-25.

Writing Point Suggestions:

- The Sunport Extension is not being designed for the stated purpose and need to balance traffic volumes, improve circulation, and congestion relief. It is designed to only increase traffic on Broadway Blvd (south), Woodward Road and Second Street south to Rio Bravo and to decrease traffic to the downtown Albuquerque central business district.
- Over ten thousand vehicles traveling every day on Woodward Road (south side of the community of San Jose). Will create adverse direct effects, such as noise and vehicle emissions for the families living in San Jose. Traffic noise that will disrupt a child's ability to sleep and concentrate, which may affect a child's acquisition of speech, language, and language-related skills, such as reading and listening interfere with speech and language. On adults and elderly, the traffic noise may cause hypertension, heart disease, and sleep disturbance.
- The increase of chemical pollution from vehicle emissions along with the idling trains and chemical smells that come from the polluting industries in San Jose will exacerbate the breathing in of air pollutants and put children and families of San Jose at a higher risk for asthma and other respiratory diseases.
- The additional ten thousand or more vehicles traveling from the Sunport Extension east and west on Woodward Road, will make it impossible for the families to merge from William Street on to Woodward Road; which is one of the three only entrances and exits the community of San Jose neighborhood has. An exit and entrance (William Street and Woodward Road) the community of San Jose has had accessed for over seventy-five years.
- The additional auto emissions from over ten thousand vehicles along with idling trains in the community of San Jose will increase the community's cumulative impacts of air toxics such as benzene, PM10 and PM 2.5.
- The multi-modal bike and pedestrian lanes are dangerous. Who will ride a bicycle or take a baby carriage up the Sunport Extension next to big semi-trucks traveling at 45 miles per hour and other traffic speeding to pass a semi-truck at 60 miles per hour. The Sunport Extension is unsafe for multi-modal use.
- The Sunport Extension bike lanes (one in each direction) will be extremely dangerous to bicyclists riding a bicycle along the side of a semi-truck traveling at speeds of 45 MPH.
- Drivers traveling west on Woodward Road will become frustrated when the trains are completing a track switching operation; impatient and frustrated drivers trying to avoid lengthy delays from the freight train switching operations will speed through the neighborhood of San Jose trying to find an exit to get back onto Broadway Blvd. Putting the children and families living on William St, Bethel Ave and San Jose Ave in harms way.

- Big semi-trucks and tanker trucks are going to have difficulty making their way up a grade 7 hill (Sunport Extension), then queue up and turn onto the northbound I-25 ramp. When the exiting airport traffic is fast and unyielding, especially for a big semi-truck.

The Environmental Assessment states traffic vehicles will increase on 2nd street and Rio Bravo.

Writing Point Suggestions:
Bernalillo County has not addressed what they are going to put in place to protect and keep the children and families on Quetzal Drive and Poco Loco Drive safe from adverse direct effects of vehicles speeding through their neighborhood. When traffic on 2nd Street is backed up waiting to turn right on Rio Bravo. Frustrated drivers will drive on the dirt shoulder of 2nd St then turn right onto Rossmoor Dr. and Cameo Dr. cutting through the neighborhood as fast as they can to get to Rio Bravo, then other frustrated drivers will follow repeating the same pattern. This is already happening today.

c. The EA states the purpose and need for the Sunport Extension is Improved Access and Circulation. Improve access to economic centers and related commercial and industrial development through a more direct roadway link from Albuquerque International Sunport and I-25 to Broadway Boulevard and Second Street.

Writing Point Suggestions:
In 2017, the community members of San Jose and Mountain View had to request and attend 6 Public Information Hearings on polluting industries for numerous hot mix and recycle asphalts plants, a Concrete Crushing Demolition Company and a Chemical Terminal Company applying for air quality permits. All six air permits where approved. On August 30, 2018 community members of Mountain View and San Jose will be attending a second Public Information Hearing for 2018 regarding another polluting industry applying for an Air Quality Construction Permit (New Mexico Terminal Services) to build another hot mix asphalt facility in the community of Mountain View. With all the new hot mix asphalt facilities and existing hot mix and recycling asphalt facilities that have already been approved for air permits in 2017/2018. The community of Mountain View is becoming the corridor for hot mix and recycling asphalt facilities for the Unincorporated Bernalillo County, City of Albuquerque and the State of New Mexico.

- The proposed Sunport Extension roadway WILL NOT bring economic centers, hotels or restaurants to build near Broadway Blvd (south), Rio Bravo Blvd. and 2nd Street. The land the County would like to see developed is cheap to purchase and zoned M-2 & SU-2 for Heavy Industries. It will attract and encourage more polluting industries to locate and build their facilities in the communities of San Jose and Mountain View.
- Albuquerque Asphalt owner told the community of Mountain View and San Jose at the Public Information Hearing/Round Table held on April 26, 2018 that Commissioner Quezada assisted them (Albuquerque Asphalt) in finding a location to build a Portable Hot Mix Asphalt facility in Mountain View as long as they did not build across from the school. Albuquerque Asphalt is planning to built across the street on Broadway (east side) a distance away from Mountain View Elementary School.
- Commissioner Quezada failed to see across the street from the Mountain View Elementary School the existing Black Rock Asphalt facility, the proposed building of Mountain States Constructors

(Hot Mix Asphalt Plant) and Albuquerque Asphalt planning to build their Hot Mix Asphalt Plant are all within a mile range east from the Mountain View Elementary School.

- If San Jose and Mountain View were to have filed an appeal on any of the 7 approved air permits, according to the City of ABQ/Bernalillo County Air Quality Control Board Adjudicatory Guidebook. The only way the hearing Officer for Air Quality Control Board will accept the community's research, technical or scientific data is through an attorney, toxicologist or scientist.
- We should ask if Roger Paul from the Public Works Department's budget and if Commissioner Quezada from his discretionary funds are going to put money aside for the community of Mountain View and San Jose to hire attorneys, toxicologists or scientists to challenge all the new air permits that will be approved from the new polluting industries the Sunport Extension is going to attract.
- People traveling through the Sunport Extension to Woodward and 2nd Street will see two Bulk Gasoline Terminals and four Concrete Crushing Demolition Companies will get the impression the Sunport Extension is the major arterial for polluting industries in the Unincorporated Bernalillo County.
- People will only see the mountains of boulders and broken concrete stacked so high, you no longer can see the beautiful cottonwood trees in the Bosque and the view of the mountains.
- For Bernalillo County to attract US Foods and Admiral Beverage into the area the County had to give US Foods and Admiral Beverage personal Property Tax Exemptions and Industrial Revenue Bonds and the families of San Jose living on Broadway Blvd. (North), Wesmeco Dr and Arno St who pay property taxes do not have storm drainage and sidewalks.
- From the 2900 Block of William Street to Woodward Rd the community of San Jose does not have sidewalks to walk to the proposed Woodward Road Improvements. The County Public Works Deputy Manager Roger Paul said at the July 19, 2018 Public Hearing: "Woodward Road is a city street and the city may have other plans for it beyond this Project. None that they know of, there will be no road reconstruction between 2nd, Woodward, Broadway and I-25 there will be no bike lanes, no sidewalks and no improvements. These could be done potentially if another Project was setup, without this Project improvements will not happen."
- Ask Roger Paul, what happens to the General Obligation Bond funding tax payers approved for the Woodward Road Reconstruction? How can Bernalillo County Public Works take away the money from General Obligation Bond voters approved for the Woodward Road Reconstruction?
- Request the County and Bernalillo County Public Works to be transparent with the public and disclose within thirty days (after July 31, 2018 on the Sunport Extension Project website) a complete breakdown of all the funding sources and allocations that has been secured for the Sunport Extension, Woodward Road and 2nd Street Improvement Reconstruction.

d. The EA states Bernalillo County has land use regulations to review and control development. The County is preparing, has prepared a developing mechanism in the draft San Jose/Mountain View design overlay standards to guide the growth of future commercial and industrial development in the Project area. A draft design overlay (San Jose/Mountain View) Bernalillo County stated in the 2015 EA "Bernalillo County is addressing land use issues in the Mountain View and San Jose communities and has prepared the draft San Jose/Mountain View Design Overlay plan to "positively influence development patterns in

an effort to shape and enhance the character and identity of Upper Mountain View." "The County has prepared the San Jose/Mountain View Design Overlay plan which, when adopted (anticipated in late 2015), could mitigate impacts from future new development."

Writing Point Suggestions:

- In the three years Bernalillo County has made the above statement in the 2015 EA, no known community members of San Jose and Mountain View has seen or read the draft San Jose/Mountain View Design Overlay.
- A Design Overlay (San Jose/Mountain View) that will probably only be a checklist for the undesirable business to know how to build a parking lot, address off-street parking, signage, landscaping, fencing and walls, lighting and setbacks.
- The draft San Jose/Mountain View Design Overlay will not change the zoning codes needed to protect the quality of lives of families living in San Jose and Mountain View.
- The community members of San Jose and Mountain View believe the draft San Jose/Mountain View Design Overlay that is being prepared or that is already prepared by Bernalillo County Public Works will not be approved by the Bernalillo County Commission. In the past twelve years the County Commissioners have not officially adopted or approved the draft Mountain View Sector Development Plan, then why will the County Commissioners officially adopt or approve the draft San Jose/Mountain View Design Overlay.

e. Public Involvement Meetings: Ecosphere's letter addressed to Agency Representative or Interested Party on April 20, 2018 mentions, "citizen involvement, as mandated by FHWA and NMDOT procedures, was accomplished through individual contact, correspondence, and meetings. During the past eight years, five public meetings and numerous agency and stakeholder consultations have taken place, and additional public involvement and agency coordination are ongoing. The NEPA process requires coordination with pertinent agencies and interested parties.

Writing Point Suggestions:

Ecosphere's Senior Project Manager letter John Taschek dated April 20, 2018 on the EA is an insult to the community members of San Jose & Mountain View who will receive the greatest potential adverse impacts of the road Project--noise, dust, traffic, interference with existing superfund monitoring and remediation systems for groundwater. The area we live in was polluted by G.E., Chevron, the American Car and Foundry (during the making of an atomic bomb), the Atchison, Topeka and Santa Fe Rail Road's creosote facility, UNIVAR who makes all kinds of hazardous chemicals (some of which are explosive), and other heavy industries that pollute the ground, air and the water in San Jose and Mountain View.

Mr. Taschek saying public involvement had been attained as part of the Project. Is not true, the public advertised meetings held by URS and Bernalillo County Public Works did not give the community members of San Jose, Mountain View and the public the opportunity to make comments or ask questions. The community and public were told after the PowerPoint presentations, "there would be no questions or comments out loud, questions or comments would be addressed at the stations on a post it notes or on an easel pad. The public was denied an opportunity to ask questions or make comments out loud. Is a violation of our basic rights as human beings to be treated with fairness and decency and respect.

f. The community of San Jose and Mountain View are economically disadvantaged communities comprised of mostly Hispanic people, it even says so in the EA prepared for the Project. URS, Ecosphere Environmental Services and Bernalillo County Public Works admit they did not take any sampling of soil borings, soil or ground water sampling, or laboratory analyses of soils, water, air around the Schwartzman and Demolition Debris Landfills. South Valley Superfund Site and rights-of-way along Woodward Road and 2nd St. admit they only did a visual inspection and web database search.

   The FHWA needs to give the Sunport Extension a "No-Build Alternative" or make the decision for an EIS to be completed to thoroughly and truthfully examine all the negative impacts the Sunport Extension will have on the families of San Jose and Mountain View for many decades.

g. The City of Albuquerque No Longer Supports the Sunport Extension Project. On May 1, 2018, Mayor Tim Keller publicly stated that the City of Albuquerque was withdrawing its support for the Sunport Blvd Extension Project. The Project, including the Woodward Road Improvements, is almost entirely on City property so there is a serious question as to why the County is doing continuing to pursue this Project.

6.18 Written Response 9

a. Hazardous materials are addressed in Hearing Response 2-d and Written Responses 14-s, 14-v,14-w, and 14-x. This comment refers to the ISA not EA.

b. Traffic-related concerns

   - Project purpose and need are addressed in Hearing Response 1-a.
   - The FHWA and NMDOT noise analysis procedures were followed, including evaluation of mitigation measures. Only a few individual residences are impacted by noise from the Project, and most of these residences already experience high noise levels from existing traffic. A large percentage or number of members of the surrounding community are not impacted by increased noise. Under FHWA criteria, noise mitigation is not feasible for the individual impacted because noise walls would cut off their access.
   - Air quality is addressed in Hearing Response 1-c.
   - The traffic forecasts for 2040 on Woodward Road show an increase of about 2,770 vpd with the Project for a total of 6,611 on Woodward Road between Second Street and Broadway Boulevard. The continued use of the Woodward/William intersection and the access that this intersection provides to the San Jose neighborhood is expected to be maintained after this project is constructed. Gaps in the flow of traffic on Woodward Road are expected as the result of the traffic signals at the nearby intersections of Woodward/Second Street and Woodward/Broadway/Sunport. These gaps will create opportunities for traffic to use this intersection for access to William Street and San Jose. Bernalillo County will work with the City of Albuquerque to monitor traffic operation at this intersection and consider the installation of a traffic signal if warranted.
   - The analysis in the EA shows that the Project would not cause transportation-related air quality impacts; therefore, cumulative impacts are not anticipated.
   - Pedestrian and bicycle issues are addressed in Hearing Response 2-c.

- Bernalillo County will work with the City of Albuquerque to monitor cut-thru traffic in the San Jose neighborhood and will consider traffic calming devices if warranted.
- The roadway would require a maximum grade of 7 percent, which is in accordance with the American Association of State Highway and Transportation Official's (AASHTO's) A Policy on Geometric Design of Highways and Streets (AASHTO 2011).
- See Hearing Response 13-a.

c. Industrial development related concerns are addressed in Hearing Responses 1-b and 3-f. Funding for the Sunport Extension includes $16,892,980 of local and federal funds available during the 4-year period from 2018 to 2021, and additional funds anticipated in subsequent years. The Woodward Road Improvements are estimated to cost approximately $4,782,641, with the full amount available from local and federal sources.

d. The proposed design overlay standards are addressed in Hearing Response 3-f.

e. Regarding past public involvement, an Input Synopsis summarizing comments and responses from the 2015 public hearing was prepared in February 2016 and published on the Bernalillo County website. Comments from the 2015 public hearing and subsequent correspondence were addressed in the current EA to the extent possible. Notably, the Sunport Extension and Woodward Road Improvements were combined and analyzed in a single EA, as requested by the public. Other comments were addressed regarding traffic congestion, air quality, multi-modal access, and cumulative impacts.

   The public availability of the current EA and public hearing were advertised in the Albuquerque Journal on July 1, 2018 and the EA was publicly available for review until July 31, 2018. Additional community announcements were included in the County's neighborhood e-newsletters, emails to neighborhood associations, and numerous social media posts and tweets. Reminder postcards for the public hearing were sent out one week prior to the hearing to approximately 2900 households and businesses located near the Project area. Emails were also sent to individuals and organizations who had expressed interest in the Project in the past. Two TV interviews about the Project and hearing were conducted and aired during prime-time news broadcasts. The Albuquerque Journal highlighted the public hearing on the day of the event.

f. The FHWA will make the final decisions on whether to proceed with the No-Build Alternative or an EIS.

g. The Mayor's letter is addressed in Hearing Response 5-d.

6.19 Written Comment 10

Manuel Candelaria, 207 Abajo Road SE, Albuquerque, NM 87102, (505) 843-7638

We don't really see a necessity for Woodward to be changed. It will create more congestion and traffic, especially big semi-trucks and such.

6.20 Written Response 10

This comment is noted.

6.21 Written Comment 11

Rita Candelaria, 207 Abajo Road SE, Albuquerque, NM 87102, (505) 843-7638

We've lived here since 1970; All my four kids were raised here. For the forty years I've lived here I haven't seen improvement. We have concrete waste, port-potty storage, and Second Street in a mess. I disagree with the Woodward Road Improvements and Sunport Extension because it will add more pollution and more contamination of the environment. And we have enough.

6.22 Written Response 11

This comment is noted.

6.23 Written Comment 12

Loretta Naranjo-Lopez, President, Santa Barbara Martineztown Neighborhood Association (505) 270-7716, mailto:sbmartineztown@gmail.com

It is easy to write down on paper the Bernalillo County has land use controls, when dealing with adverse companies that will pollute your neighborhood. I have helped our sister neighborhood of San Jose when they need assistance in challenging special use permits, or air permits. The County Planning Commission normally has meetings scheduled during business hours. So, the residents have to miss work to attend. The air permit meetings are usually held in the evening and it is normally a two-hour meeting. The results are usually the same with the applicant gaining approval with very few restrictions.

This is what usually takes place when an applicant is seeking a special use permit. The applicant views the land and negotiates with the land owner's representative to see if a land use permit can be obtained before the land is purchased. Then an application is presented to a Bernalillo County Community Development Manager. If it is determined a special use permit is needed the additional forms are completed and fees paid. The applicant has to post zone change request sign on the property and must notify neighborhood associations of the special use request, is encouraged to meet with the neighborhood associations.

Once the application is completed and provisionally approved a hearing is scheduled with the County Planning Commission. Then the representatives of the neighborhood have to schedule time off of work and attend the hearing. The day of the hearing, the applicant and applicants' attorneys see a large community presence a deferral is requested, and the hearing is rescheduled for another day. The cycle is continued until the hearing day the applicant feels there is weak opposition. Then the special use permit is approved. The community may appeal the decision to the County Commission which usually rules in favor of the applicant.

The air permitting application process is similar to requesting a special use permit, except only if there is significant interest the Director of Environmental Health Department will schedule a Public Information Hearing. At the Public Information Hearing both sides are allowed to present testimony and these hearing are passionate and lively. Then the Environmental Health Department meets behind the scenes with a couple of Air Quality Division staff members to approve the air quality permit. If the community has an attorney, they may appeal on

the merits of the case to the Albuquerque/Bernalillo County Air Quality Control Board. The appeal may take years for the hearing to happen.

All of the laws, regulations and guidelines are written to protect the applicant and the neighborhood has to prove the new company will be injurious to the community. Everyone has a definition of injurious and hearing officer thinks injurious is imminent harm, while the community is looking at the harm that occurs 5, 10 and even 15 years later. The Sunport Extension will be injurious on the first day it is opened because of the steep grade. Someone will drive down the hill faster than they should and will misjudge the traffic lights and a bad accident will happen right on the corner of Woodward and Broadway. The San Jose neighborhood is saying the freeway extension is unneeded and unwanted, yet the County is choosing to force this on the neighborhood. This community knows exactly what it feels like to have an unwanted Project forced on them. It is a shameful day when the NMDOT and FHWA join the County and impose another Project on the San Jose and Mountain View neighborhoods.

6.24 Written Response 12

See Hearing Response 1-b. This Project does not involve the special use or air quality permitting processes.

6.25 Written Comment 13

Ray Kottke, 211 Abajo Rd. SE, Albuquerque,NM 87102, 505-440-5786, rekhilo@hawaiiantel.net

I and my neighbors would receive direct impact of the pollution that would result from the proposed industrial and transportation involved in the “Build it and They Will Come” Woodward modification from the Sunport Extension bringing the Freeway into our streets and property. The notion that this expansion of Woodward and broadening of the roadways toward Second Street, allowing more building materials distribution, roadway products, waste redemption, and other base industrial products would enhance the employment possibilities and result in the cleansing of the environmental problems in our area is ridiculous and foolhardy. This area is already supposed to be an "Environmental Justice” area, to be cleansed of air and water pollution entities currently present. First of all, isn’t this a bit of the “cart before the horse” theme - telling the citizens they will get improved pollution control by approving this “pollution producing” road expansion before completing the supposed Superfund clean-up activities already plaguing the area. The folks in the area fought for some Superfund action, and now the government wants to allow pollution producing industry to expand further into our neighborhoods. Maybe it’s because this is a lower income area that government and industry think they can run over the citizens, but this isn’t over yet and there will be more and more opposition. The area citizens cannot be convinced that there will suddenly be Malls and/or stores and/or clean industry in an area that has already become a road materials, industry waste, and base industrial production area - we live here and we see the reality.

6.26 Written Response 13

This comment is noted. See Hearing Responses 1-b and 3-f.

6.27 Written Comment 14-a

Jonathan Block, Staff Attorney, New Mexico Environmental Law Center

a. (Section I-A-1) The ES is not a stand-alone document covering both the Sunport and Woodward Projects.

6.28 Written Response 14-a

The FHWA concluded in 2016 that the two environmental documents (EA for Sunport Extension and draft categorical exclusion [CE] for Woodward Road) should be combined and presented as a single EA. This conclusion was based on the premise that analyzing impacts linked to both Projects separately would constitute segmentation; implementation of the Sunport Extension Project would necessitate improvements to Woodward Road. As a result, the current EA was prepared to updated information, including conducting new studies, incorporating study results from the previous individual Projects where still applicable (such as regarding cultural resources), and evaluating both Projects as a combined action.

6.29 Written Comment 14-b

b. (Section I-A-2) The 2014 Technical Study for Woodward Road was not an EA, rather a study to support preparation of a CE.

6.30 Written Response 14-b

The 2014 Technical Study addressed traffic conditions and preliminary design concepts. That study is now updated. It was never portrayed as an EA. The current EA contains a detailed description of how the design of the Sunport Extension and Woodward Road Improvements evolved into the current Project. This process involved at least five traffic related technical studies.

6.31 Written Comment 14-c

c. (Section I-A-3) No additional study or analysis was done to prepare the current EA and no reply was prepared to 2015 Public Hearing comments.

6.32 Written Response 14-c

The current EA includes updates or new studies of Project purpose and need, traffic forecasts and analysis, and design features. A new biological study, ISA, noise analysis, and air quality analysis were prepared for the current EA. These studies were documented with individual reports. Previous Cultural resource studies for the entire corridor (Sunport and Woodward) are still relevant and are summarized in the EA. Analysis and text throughout the current EA was updated to incorporate the new study findings and address the combined Project.

See Written Response 9-e regarding past public involvement.

6.33 Written Comment 14-d

d. (Section I-A-4) There are lapses in the NEPA process. Health Impact Partners (HIP) was not notified until 3 days prior to the hearing, no new schedule was shown on the County website, the EA was not available until end of June, the air quality report was not provided until a few days prior to the hearing, and the EA did not respond to agency coordination letters.

6.34 Written Response 14-d

Regarding the public availability of the EA, see Written Response 9-e.

Not all technical reports were published on the website (biological evaluation, ISA, noise report, traffic studies, etc.) Although the air quality analysis was not required because Bernalillo County was designated as an "attainment" area in 2016, a follow up analysis was performed to confirm the findings of the previous 2015 analysis in light of new 2040 traffic forecasts. The air quality modeling and analysis was done early in the process to report the findings in the EA, but the final report was completed concurrent with the EA.

Extensive agency coordination has been conducted over the past 8-10 years as part of the development of this Project. New agency letters with an invitation for comments were sent in April 2018. Agency comments received at the time of EA publication included concurrence from the SHPO on the finding of the cultural resource reports, information from the US Fish and Wildlife Service on protected species, and several agency responses with no comment. No other new comments were received from agencies.

6.35 Written Comment 14-e

e. (Section I-A-5) When a single EA is prepared, it must have another public hearing. The July 19 hearing was merely a comment opportunity, with no questions allowed.

6.36 Written Response 14-e

A single EA has been prepared and a public hearing held. The attached responses address all the comments received at the meeting and in subsequent correspondence. The approach of listening to comments without engaging in extensive discussion allowed time for all commenters to present their questions and concerns and for informed responses to be considered and prepared. Numerous previous public meetings have been held that allowed the opportunity for questions, answers and general discussion regarding the Project. The July 19th Public Hearing represented the culmination of the public involvement process. Although new studies were performed as described above, results and conclusions were not materially different from past findings and conclusions, thus diminishing the value of further meetings.

6.37 Written Comment 14-f

f. (Section I-A-6) The EA does not establish purpose and need and therefore the preferred alternative is not acceptable.

6.38 Written Response 14-f

See Hearing Response 1-a.

6.39 Written Comment 14-g

g. (Section I-B-1) There is no demonstrated need for the Project: The EA fails to evaluate traffic congestion, need for new access, and the economic rationale for the Build Alternative.

6.40 Written Response 14-g

Traffic growth has been forecast for the Project area by the MRCOG. These forecasts have been developed both with Sunport Boulevard Extension in place (the Preferred or Build Alternative) and without Sunport Boulevard Extension being constructed (No-Build Alternative). Traffic growth—increases in daily traffic volumes—is forecast for the future design year (2040) regardless of whether the Sunport Boulevard Extension is constructed. With the use of the forecast traffic volumes, capacity and operational analyses of the intersections within the Project limits has been completed using nationally accepted software (the Institute of Transportation Engineers' *Synchro*). This includes the intersections of Woodward/2nd Street, Woodward/Broadway/Sunport, and the Sunport/I-25 ramps. Delays and LOS have been calculated. These analyses have been performed for the Build Alternative only. No intersection operational analyses have been performed for the No Build conditions because the Project's primary purpose is transportation system connectivity and not related to addressing congestion problems on the existing street system.

Traffic congestion has been included as part of the Project's purpose and need because of the inherent benefit associated with the broader distribution of traffic over more roadways. As described in the EA and in all previous related Project documents, traffic on Broadway and Second Street, north of Woodward Road and Sunport Boulevard, is forecast to be *reduced* with Sunport Boulevard Extension in place, thus there is a benefit relative to traffic congestion with the Build Alternative, particularly to the adjacent San Jose neighborhood.

Traffic volume forecasts and operational analyses have not been performed for the alternatives ruled out from further consideration. Alternatives D and H have been eliminated from further consideration because they do not meet the purpose and need for the Project and due to the numerous fatal flaws associated with their alignments. Therefore, there is no practical reason for additional analyses of these alternatives.

6.41 Written Comment 14-h

h. (Section I-B-2) The EA does not provide an evaluation of whether traffic congestion is problematic. Future traffic on Second Street needs to be analyzed.

6.42 Written Response 14-h

In the No Build condition, 2040 traffic on Second Street south of Woodward is forecast to be 12,600; traffic on Second Street north of Woodward is forecast to be 10,000. *These forecasts volumes are without the addition of Sunport Boulevard*. In the Build condition, 2040 traffic on Second Street south of Woodward is forecast to be

13,800; traffic on Second Street north of Woodward is forecast to be 7,900. Thus, a traffic reduction is seen north of Woodward with the Project. Forecast traffic volumes on Second Street south of Woodward are lower with the No-Build Alternative by about 8 percent; however, in either case with the Build or No-Build Alternatives, major improvements to Second Street between Rio Bravo and Woodward will likely be needed by 2040 to accommodate the forecast traffic growth. Bernalillo County will monitor this situation and consider planning for future improvements to Second Street when traffic growth dictates.

In the No Build condition, 2040 traffic on Broadway south of Woodward is forecast to be 11,300; traffic on Broadway north of Woodward is forecast to be 14,800. These forecasts volumes are without the addition of Sunport Boulevard. In the Build condition, 2040 traffic on Broadway south of Woodward is forecast to be 12,500; traffic on Broadway north of Woodward is forecast to be 8,800. As with Second Street, in either the Build or No-Build Alternatives, major improvements to Broadway will likely be needed by 2040 to accommodate the forecast growth.

6.43 Written Comment 14-i

i. (Section I-B-3) The EA does not demonstrate an access problem using travel time accessibility measures.

6.44 Written Response 14-i

Detailed studies of travel time comparisons or accessibility analyses have not been performed and are considered unnecessary since the issues of travel time for area access to I-25 are basically moot—the transportation gap identified in the 1980s and 1990s studies, and in current Project studies since 2009 still exists and is best addressed via the Preferred Alternative.

6.45 Written Comment 14-j

j. (Section I-B-4) The discussion of economic growth is too optimistic and does not account for the fact that the area already has access, albeit less direct.

6.46 Written Response 14-j

The EA utilized the Strategic Highway Research Program II (SHRP2) EconWorks *Assess My Project* tool. This planning tool draws from the case study database to estimate the range of economic impacts likely to results from a specific type of Project in a defined setting. It identifies a reasonable range for expected economic impacts based on factors such as the type of facility proposed, costs, and traffic volumes (in this case a connector type facility with an estimated cost of approximately $26 million and a daily traffic volumes of about 11,000 vpd). The *Assess My Project* tool does not provide information on the effects of changing reliability, connectivity, or accessibility (SHRP2 2016).

6.47 Written Comment 14-k

k. (Section I-B-5) The EA does not make it clear that industry will be allowed to locate here—how will the area look? Is the Project compatible with future uses?

6.48 Written Response 14-k

The EA identifies existing zoning in the area with a narrative and zoning map, describes previous planning documents such as the Southwest Area Plan, and acknowledges that permissible land uses, including heavy industry, can locate in the area under these regulations and policies. The EA acknowledges that growth is likely to occur in the area (and probably more rapidly with the Project), but it cannot appropriately speculate as to the rate of growth or type of specific development that may be proposed on individual parcels.

6.49 Written Comment 14-l

l. (Section I-B-6) The EA does not make it clear that economic benefits are to the entire region.

6.50 Written Response 14-l

The economic benefits predicted by the EconWorks *Assess My Project* tool would accrue within the entire region.

6.51 Written Comment 14-m

m. (Section I-B-7) The EA does not consider a bike/pedestrian only No-Build Alternative.

6.52 Written Response 14-m

The primary purpose for this Project is transportation system connectivity with respect to all modes of travel, not just pedestrian and bicycle modes. A pedestrian-bicycle only alternative would not satisfy this purpose in itself; however, the inclusion of pedestrian and bicycle facilities along with vehicle facilities does satisfy the Project purpose. A pedestrian-bicycle only alternative would have to be programed as a separate Project by the City or County through the MRCOG and/or NMDOT planning processes.

6.53 Written Comment 14-n

n. (Section I-B-8) The EA does not include a discussion of contamination pathways and potential health risks from construction in contaminated areas.

6.54 Written Response 14-n

See Hearing Response 2-d and Written Responses 14-s, 14-v, 14-w, and 14-x.

6.55 Written Comment 14-o

o. (Section I-B-9) The EA is vague in regard to hazardous materials contamination pathways, traffic changes, and the importance of noise impacts. Specifically, the EA does not address the potential impacts of a possible new parking area in the corridor.

6.56 Written Response 14-o

- Hazardous Materials: See Hearing Response 1-d.
- Traffic: See Written Responses 15-g and 15-h.
- Noise: See Written Response 9-b, bullet 2.
- Parking: Forecasting and analysis of site specific traffic due to any given development (parking areas) would be the subject of future traffic impact studies that Bernalillo County would require to be completed by developers and is thus not part of this Project's analysis.

6.57 Written Response 14-p

p. (Section I.B.10:) Indirect and Cumulative Impacts should be evaluated in more detail. Population forecasts that show less future growth indicating that there is less need for the Project.

6.58 Written Response 14-p

- According to the Practitioners Handbook: Assessing Indirect Effects and Cumulative Impacts Under NEPA. (ASSHTO 2016), indirect and cumulative impacts must be considered if they are reasonably foreseeable. Impacts that are merely possible, or that are considered "speculative," are not reasonably foreseeable. In the EA, indirect effects were addresses only for those resource areas with potential impacts from the Project. Because of the disturbed nature of the area, impacts to natural resources are not anticipated. Impacts to cultural resources are also expected to be relatively minor, based on full surveys of the area. Although air quality impacts have been identified as a concern during the public involvement process, the analysis shows that the Project would not cause transportation-related air quality impacts. The Project would create some direct noise impacts, but no indirect effects are anticipated. Indirect effects are not anticipated to result in the areas of visual resources, Section 4(f) properties, farmland, relocations and ROW, utilities, or construction activities. Multimodal transportation and hazardous materials have potential direct impacts, but indirect effects are not expected. The areas where potential indirect effects may occur include land use and socioeconomic concerns, primary related to induced-growth, which is discussed in detail.
- Cumulative impacts are addressed in Hearing Response 3-c.

6.59 Written Comment 14-q

q. (Section I.B.11) 30-year old rainfall data does not account for climate change.

6.60 Written Response 14-q

According to the National Weather Service, the official 30-year normal (1981-2010) is 9.45 inches. Recent years have been drier than normal, with only 2015 wetter than normal in Albuquerque since 2007. (https://www.weather.gov/abq/climonhigh2017annual-tempprecipabq).

6.61 Written Comment 14-r

r. (Section I.B.12) The EA does not account for increased impermeable surfaces and run-off.

6.62 Written Response 14-r

The Project includes a drainage plan with stormwater ponds to manage runoff associated with the proposed improvements.

6.63 Written Comment 14-s

s. (Section I.B.13) The EA does not address how it will handle continued remediation.

6.64 Written Response 14-s

As stated in the EA, the County has coordinated mitigation measures with USEPA, NMED, and responsible parties. Coordination would continue through design and construction.

6.65 Written Comment 14-t

t. (Section II.A) The EA does not establish purpose or need that justifies a cost of $20 million. The Project is not part of a regional transportation plan. It is not a connecting link but rather a dead end at Second Street and it impacts already overburdened Second Street. It doesn't benefit new economic centers rather benefits Sunport parking lot owners. It does not explain new traffic patterns or improve emergency access.

6.66 Written Response 14-t

- The purpose and need for the Project are discussed in Hearing Response 1-a.
- The current Sunport Boulevard Extension and Woodward Road Improvements are included as part of future transportation planning for the Albuquerque area in the MTP, approved by the Metropolitan Transportation Board on April 17, 2015 (MRMPO 1015), including designated bicycle facilities. The project is also included in the MRMPO's Federal Fiscal Year (FFY) 2018-2023 Transportation Improvement Program, which was approved on May 19, 2017 by the MTB and the NMDOT's Statewide Transportation Improvement Program, approved by the New Mexico State Transportation Commission, FHWA, and Federal Transit Administration.
- Impacts on Second Street are address in Written Response 14-h.
- Parking lot owners are addressed in Written Response 14-o.

6.67 Written Comment 14-u

u. (Section II.B) With no established purpose and need, the alternatives analysis is flawed. The Project does not have independent utility because it requires improvements to Second Street.

6.68 Written Response 14-u

- With the established Project purpose of transportation system connectivity, only alternatives that addressed this purpose were considered. Therefore, bicycle (only), pedestrian (only), traffic system management and travel demand management alternatives (only) were eliminated from consideration because they do not address the Project's purpose and need. In order to provide a reasonable connecting roadway between the existing Sunport Boulevard/I-25 Interchange and Broadway, three roadway alignment alternatives were developed. Two of these alternatives were effectively the same as previous alternatives developed during similar Project studies done in the late 1980s. These alternatives were labeled as Alternative D and H. The third was developed for this study and consisted of the direct connection between the Sunport/I-25 Interchange and the existing Woodward/Broadway intersection. This alternative was designated as Alternative A which ultimately became the Preferred Alternative. No alternatives were considered that were north of the Woodward Broadway Interchange because of their probable impacts on the developed San Jose neighborhood. To the south, Alternatives D and H were eliminated from further consideration because they are fatally flawed from an engineering and basic feasibility perspective, and they did not adequately satisfy the Project purpose and need. The EA thus addressed the potential impacts of Alternative A, the Preferred Alternative, and determined that this alternative is the only practical alternative that would address the purpose and need.
- The initial studies performed during the inception of the current Project addressed the connecting roadway only, between Broadway and I-25. As part of those studies, traffic volume increases forecasted for Woodward Road between Second Street and Broadway would effectively require future improvements to Woodward Road. These improvements were not initially included in the Project due to the concept that the primary need was to provide a connection where none existed previously. The addition of Woodward Road to the Project was the result and response to public comment.

6.69 Written Comment 14-v

v. (Section II.C) Because there are RECs in the Project area, the Project can only be addressed with an EIS. The 2017 ISA failed to reexamine RECs from the 2015 ISA.

6.70 Written Response 14-v

There is confusion between the ISA and EA (NEPA) processes. The presence of RECs does not trigger an EIS. The ISA was consistent with the methods and procedures for Phase I Environmental Site Assessments (ESAs) (ASTM E1527-13). The ISA was intended to identify RECs along the right-of-way and properties requiring further assessment. The ISA included an evaluation of the 2015 ISA and a discussion of whether properties identified in the 2015 ISA constituted RECs for the 2017 ISA.

6.71 Written Comment 14-w

w. (Section II.C-1) The EA does not address concerns raised about the 2015 EA regarding the South Valley Superfund Site, Schwartzman landfill, Duke City fueling site, and Chevron property.

6.72 Written Response 14-w

- *Item C.1.a*. The ISA was not intended to be an in-depth evaluation of costs. Mitigation methods and costs should be evaluated and detailed as part of Phase II and III proposals.
- *Item C.1.b*. The Duke City Refueling property was identified as a REC in the 2017 ISA and a Preliminary Site Investigation (PSI) was recommended.
- *Item C.1.c*. The Schwartzman Landfill was identified as a REC in the 2017 ISA and further assessment was recommended to determine if the landfill would impact the site or not. As discussed in the ISA, if landfill areas are found and utility work is proposed, the City of Albuquerque Landfill Interim Guidelines would be followed to prevent landfill gas migration.
- *Item C.1.d*. Based on information provided by the NMED for the Chevron facility related to the groundwater contamination, groundwater beneath the facility underwent remediation and as of the 2017 ISA was undergoing monitored natural attenuation. No groundwater monitoring wells related to the Chevron facility were located on or immediately adjacent to the subject property (Project area), and this groundwater contamination was not considered to be a REC to the subject property. The recommendation for landowner liability protection was related to the South Valley Superfund Site, of which the Chevron facility was identified as a responsible party.

6.73 Written Comment 14-x

x. (Section II.C-2) The 2017 ISA does not meet ASTM Standards for Environmental Assessments

6.74 Written Response 14-x

The ISA was performed in accordance with ASTM E1527-13 for Phase I ESAs. The evaluation included reviews of historical records sources and NMED agency records, where available, for sites identified as potential environmental concerns. The evaluation of RECs included information within NMED agency records (i.e., Chevron groundwater sampling data). Use and handling of chemical substances and/or hazardous materials does not necessarily constitute a material threat of a future release. Information provided within the environmental database report, historical records, regulatory records and the site reconnaissance were evaluated as a whole to determine whether or not a specific facility constituted a REC to the subject property (proposed right-of-way areas). A facility without a reported release or hazardous waste violations and where chemical and/or waste storage/handling was not observed or noted in historical records on or adjacent to the proposed right-of-way areas were not considered to represent a material threat of a future release to impact the subject property and were therefore not considered to be RECs.

Areas of known or delineated contamination were limited to the South Valley Superfund Site. Maps depicting the defined area of groundwater impacts were included in the 2017 ISA Appendix G. In addition, the boundaries of the South Valley Superfund Site, the approximate Schwartzman Landfill buffer zone boundary, and properties identified as RECs are depicted on the 2017 ISA Figure 2. Subsurface investigations (PSIs, Phase II/III ESAs) would be required to define contamination, if any, and to determine potential clean-up costs, if any, at sites identified as RECs in the 2017 ISA.

The specific recommendation for landowner liability protection in the 2017 ISA is related to the known contamination in the South Valley Superfund Site, in order to protect Bernalillo County from becoming an owner, and therefore a potentially responsible party, to the contamination. The statement, "URS cannot warrant or guarantee that not finding indicators of hazardous materials means that hazardous materials do not exist on the subject site," is a standard limitation statement for Phase I ESAs and continues, "there is no investigation thorough enough to preclude the presence of materials on the subject site, which presently, or in the future, may be considered hazardous. Because regulatory evaluation criteria are constantly changing, concentrations of contaminants present and considered to be acceptable may, in the future, become subject to different regulatory standards and require remediation." The statement in no way attempts to "distance" AECOM from our work. We stand by our professional judgement and the results of our work. The ISA is an initial assessment intended to identify properties for further evaluation. As recommended in the ISA, additional assessment should be performed on several properties along the proposed right-of-way prior to construction.

6.75 Written Comment 14-y

y. (Section III.A) The Sunport Commerce Center Design Overlay proposes land uses that should be considered as part of this Project.

6.76 Written Response 14-y

The Sunport Commerce Center Design Overlay was abandoned and never adopted; therefore, the various concepts proposed in the plan are not relevant to the analysis in the EA. The Sunport Commerce Center Design Overlay does provide a model or example of how the proposed San Jose and Mountain View Overlay might function in the sense that it would create additional standards that apply to the underlying zoning.

6.77 Written Comment 14-z

z. (Section III.B) Design Overlays instead of Environmental Justice-The proposed San Jose and Mountain View overlay would not address underlying problems of existing zoning and land use.

6.78 Written Response 14-z

The proposed San Jose and Mountain View Overlay is an ongoing County planning process that will provide opportunities for public involvement in the development of guidelines, in addition to existing zoning requirements, that will apply to land use proposals in the Project area. The overlay planning process is not dependent on the current road Project.

6.79 Written Comment 15

(Section IV.A): Supplemental Comments of Steve and Esther Abeyta: 2419 William Street, Albuquerque, New Mexico 87102

a. **Purpose and Need:** The main purpose of the EA is improving access to industrial development. The Project will provide congestion relief, especially on south Second Street. Multi-modal travel will be dangerous next to high-speed traffic on the Sunport Extension.

b. **Public Involvement throughout the Process:** Our concerns were never addressed, and questions were not answered at some of the public meetings.

c. **Development of the Current Project:** The Project studies are outdated. Access to the airport has changed; there are multiple routes to access the airport now. There is no explanation of how the South Diversion Channel multi-use trail would connect to the Sunport Extension.

d. **Project Purpose and Need:** The Project no longer makes sense because there are multiple access routes to the airport. Additional traffic to Second Street and Broadway Broadway is a disaster; these streets need improvement first. The Projects is mainly intended to provide access to industrial development.

e. **Preferred Alternative:** The 7-percent grade will slow down truck traffic. Bike and pedestrian travel will be dangerous next to the truck traffic.

f. **Cultural Resources**: The Project area should be preserved as a historic site to tell the community's story of suffering.

g. **Air Quality:** An increase in semi-truck traffic will emit more air pollution. In addition, more industry in the area, attracted by the Project, will also generate more air emissions.

h. **Noise**: The community is supposed to endure added noise because of an unnecessary road Project

i. **Socioeconomic and Environmental Justice**: The community has a history of industrial contamination. It is not a typical community and has Environmental Justice populations. The Project will worsen the situation and there is no protection by local government.

j. **Hazardous Materials**: There are unknow hazardous materials and old land fill sites. The Project did not conduct testing.

k. **Indirect Effects**: There is a history of air permits and industrial development in the area and local government has done nothing to control them.

l. **Cumulative Impacts**: There has been no control of the cumulative effects of industrial development with air permits. We need an EIS that considers these air emissions along with traffic emissions.

m. **Public Involvement Process**: Summarizes nine meetings held on the Project since 2010. The November 15, 2015 meeting on the Woodward Road Improvements was not mentioned in the EA. The public was not allowed to asked questions at some of the meetings, but rather was directed to stations.

n. **Final Obsevations/Comments:** There are many impacts and the EA downplays or disregards them The Project should have the No-Build Alternative or EIS.

o. **Conclusion:** The attached letter from HIP is incorporated by reference. The No-Build Alternative should be selected for the Project.

6.80 Written Response 15

a. See Hearing Response 1-a.

b. See Written Response 9-e.

c. Although there are numerous means of access to the airport from the southwestern portion of the metropolitan area, the Project provides more direct access to the airport from Broadway Boulevard, Second Street, and the land west of I-25. The trail connection to the South Diversion Channel would be addressed in final design.

d. See Hearing Response 1-a and Written Response 15-c.

e. See Written Response 9-b.

f. The cultural resource investigations for the Project did not identify resources or effects related to the modern community's history. The cultural resource report was reviewed by the SHPO, who concurred with the findings.

g. See Hearing Response 1-c.

h. See Hearing Response 3-c.

i. See Hearing Response 3-e.

j. See Hearing Response 2-d and Written Responses 14-s, 14-v, 14-w, and 14-x.

k. See Hearing Response 14-p.

l. See Hearing Response 3-c.

m. See Written Response 9-e. The November 15, 2015 meeting on the Woodward Road Improvements was another opportunity for public involvement on the Project that was not mentioned in the EA

n. See Hearing Response 1-e.

o. The comments in the letter from HIP primarily concern the earlier 2015 Project EA and are addressed in the current EA.

7. Any changes to the EA and/or Project design features made in response to agency and public comments

Table 7-1. Matrix of Comment Categories and Project Responses

Comment Category/Topic	Project Response
Purpose and Need	The purpose and need for the Project has been reevaluated as part of the current EA, including analysis of revised traffic forecasts based on updated regional population forecasts. This reanalysis affirmed the primary purpose and need of the Project to improve roadway system connectivity, access and circulation, and multimodal transportation facilities.

Comment Category/Topic	Project Response
Air Quality	The reevaluation of air quality in the current EA demonstrates that the Project would not cause transportation-related impacts. Air emissions from existing or new industrial development in the Project area are regulated by the City under state and federal law. The EA acknowledges the potential for growth in the Project area but has no ability or authority to analyze potentially related, hypothetical air quality impacts.
Hazardous Materials	In accordance with NMDOT policy, the current EA included an updated ISA for hazardous materials, which evaluated existing data and identified a need for more detailed investigations to define the specific characteristics of contamination, if it exists, and provide remediation strategies. As the design proceeds, detailed plans would be developed to mitigate and avoid any risks associated with contamination. Avoidance of wells and other infrastructure associated with the groundwater remediation systems would be implemented as part of the final design and construction. Coordination has been ongoing and would continue between the County, NMED, EPA, and responsible parties.
Noise	An updated noise analysis was prepared as part of the EA. The FHWA and NMDOT noise analysis procedures were followed, including evaluation of mitigation measures. Only a few individual residences are impacted by noise from the Project, and most of these residences already experience high noise levels from existing traffic, as well as from aircraft and rail operations. Under FHWA criteria, noise mitigation is not feasible for the individual properties impacted.
Land Use	Land that would be directly impacted by the Project is primarily industrial, vacant, or occupied by groundwater remediation systems, and is situated between the more highly developed residential areas of the San Jose and Mountain View neighborhoods. The EA acknowledges that additional development may be encouraged as a result of the new access. This Project cannot change zoning or regulate existing development. The County has expressed its intent to develop design overlay standards that would impose additional requirements above and beyond existing zoning on future development in the area. The status of the current Project would allow this planning process to go forward with reasonable expectations about the future transportation system in the area.

Comment Category/Topic	Project Response
Traffic Impacts	The revised traffic forecasts in the current EA showed that traffic volumes would decrease north of the Project area and increase to the south on Broadway Boulevard and Second Street. As part of the public involvement process, concerns were expressed about increased traffic on south Second Street and potential cut-thru traffic in the Rossmoor neighborhood located west of Second Street and north of Rio Bravo. Although improvements may be needed for south Second Street, those would be the subject of other planning and future projects and are not planned at this time due to funding constraints. Installation of traffic calming mechanisms would likely alleviate the cut-thru use of neighborhood streets. Bernalillo County has been and will continue monitoring this situation and consider the installation of traffic calming devices when cut-thru traffic problems become significant.
Multi-Modal Facilities	The Project includes planned pedestrian and bicycle facilities along the Sunport Extension and Woodward Road from I-25 to Second Street and provides a connection to the network of proposed bikeways or trails along the Albuquerque Riverside Drain, Second Street, the San Jose Lateral, the AMAFCA South Diversion Channel, and University Boulevard. The Project would provide east-west connectivity for the pedestrian and bicycle system along Woodward Road and the Sunport Extension in conjunction with these facilities. As a result of previous public comments, multi-modal facilities were provided along the entire length of the Project corridor. The Project pedestrian and bike facilities are designed with safety features. Sidewalks and bike lanes or multi-use trails would be included as part of the typical roadway cross section for the Sunport Extension. The sidewalks, bike lanes, or multi-use trails would be separated from the driving lanes by concrete wall barriers on Sunport Boulevard. Curb ramps would be provided at the intersections along the Sunport Extension, in accordance with ADA requirements. The signalized intersection of Sunport Boulevard and Broadway Boulevard would include pedestrian push buttons for full accessibility. On Woodward Road, bike lanes and sidewalks would be provided on both sides of the road and a connection would be provided to the Rio Grande Bosque multi-use trail west of Second Street.

Comment Category/Topic	Project Response
Environmental Justice	The EA considered Environmental Justice in detail (see Table 5.2) in the context of FHWA's Environmental Justice Strategy and concluded that the Preferred Alternative would comply with EO 12898 on Environmental Justice. The Project would not have disproportionately high adverse impacts on minority or low-income population groups. Although it has been contentious, there has been substantial public involvement throughout the Project, inclusive of affected communities. The Project would not deny, reduce, or significantly delay the receipt of benefits by minority or low-income populations. Major Environmental Justice-related concerns, such as induced growth, air emissions from new industry, traffic congestion, and hazardous material contamination, are addressed in the EA and throughout these responses.
Cumulative Impacts	Cumulative impacts are addressed extensively in the current EA for those topics where direct impacts are anticipated. Although the Project would affect remediation systems for contaminated sites, adverse impacts would be avoided through additional testing and continued coordination with the parties responsible for the remediation systems. Any needed relocation of existing remediation facilities is planned as part of the Project, at Project expense. The analysis in the EA shows that the Project would not cause transportation-related air quality impacts; therefore, cumulative impacts are not anticipated. The Project would create direct noise impacts, which would have cumulative impacts with other environmental noise sources from rail and airport operations and other urban activities. Project-related noise impacts affect a relatively small number of sensitive receptors. Growth in the Project area may also have cumulative impacts with other regional developments in terms of possible changes in travel and land use patterns and neighborhood character. The provision of pedestrian and bicycle facilities within the Project corridor would improve local multimodal circulation and provide a needed east-west linkage that would have positive cumulative impacts with the regional trails network.
Public Involvement	An Input Synopsis summarizing comments and responses from the 2015 public hearing was prepared in February 2016 and published on the Bernalillo County website. Comments from the 2015 public hearing and subsequent correspondence were addressed in the current EA to the extent possible. Notably, the Sunport Extension and

Comment Category/Topic	Project Response
	Woodward Road Improvements were combined and analyzed in a single EA, as requested by the public. The public availability of the current EA and public hearing were advertised in the Albuquerque Journal on July 1, 2018 and the EA was publicly available for review until July 31, 2018. Community announcements were included in the County's neighborhood e-newsletters, emails to neighborhood associations, and numerous social media posts and tweets. Reminder postcards for the public hearing were sent out one week prior to the hearing to approximately 2900 households and businesses located near the Project area. Emails were also sent to individuals and organizations who had expressed interest in the Project in the past. Two TV interviews about the Project and hearing were conducted and aired during prime-time news broadcasts. The Albuquerque Journal highlighted the public hearing on the day of the event.

8. Final list of commitments and mitigation measures that will be implemented as part of the proposed Project

The following commitments would be implemented by the County as stipulations and provisions included in the design and construction contract. These design features are incorporated as part of the Preferred Alternative.

- **Climate, Geology, and Soils (Section 4.2).** The construction contractor would file a Notice of Intent (NOI) as an operator with the EPA. The NOI would allow the contractor to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) general construction activity permit. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared to define erosion control measures, stormwater management measures, structural controls, and best management practices (BMPs) to mitigate erosion.
- **Water Resources (Section 4.3).** The County would obtain all required permits to comply with Section 404 and Section 401 of the Clean Water Act (CWA) for work in waters of the U.S., if applicable.
- **Floodplains (Section 4.5).** Measures would be taken to avoid impacts to floodplains. The South Diversion Channel would be protected from sediment, construction debris, and fuels entering the channel.
- **Vegetation (Section 4.6).** All disturbed areas would be reseeded according to standard NMDOT protocols and the revegetation plan, which would be detailed in the construction plans. Any disturbed areas that have not been improved with roadway surfacing or structures would be revegetated after construction.
- **Wildlife (Section 4.7).** If construction cannot be scheduled outside of the migratory bird nesting season, pre-construction surveys for migratory bird nests would be conducted during the nesting season, and any unoccupied nests would be removed. If active burrowing owl nests are found, the nests would be

avoided until the young have fledged. If active nests cannot be avoided, the County and NMDOT would coordinate with the U.S. Fish and Wildlife Service (USFWS) prior to commencement of construction activities.

- **Cultural Resources (Section 4.9).** If buried cultural deposits are encountered during Project activities, work would cease immediately and NMDOT and the SHPO would be notified. A limited testing plan for archaeological site Laboratory of Anthropology (LA) 167700 would be implemented. Complete avoidance of LA 167701 may be possible based on the final Project design. If avoidance is not possible, a testing program and follow-up activities would be implemented. If the South Diversion Channel is damaged or altered during construction activities, it would be replaced with like materials.
- **Air Quality (Section 4.10).** A dust control plan and a fugitive dust permit would be developed and dust control measures would be incorporated into construction plans, as required by the City of Albuquerque.
- **Visual Resources (Section 4.12).** Aesthetic elements, such as the use of colored concrete and form liners that create patterns and texture in the exposed concrete surfaces, would be included in final design for visible bridges and retaining walls. Street-lighting features that are included in the final Project design would comply with the New Mexico Night Sky Protection Act of 1978.
- **Relocations, Rights-of-Way, and Easements (Section 4.17).** Monitoring wells identified within the Project's area of disturbance that cannot be avoided would be relocated. Coordination and mitigation measures would continue with the responsible party, USEPA, and NMED. Access to properties would be maintained during construction except for brief intervals. Bernalillo County would coordinate with property owners regarding ROW acquisitions, and easements. Affected individuals would be fairly compensated through the Uniform Relocation Assistance and Real Properties Acquisitions Policies Act and other applicable legislation (49 CFR 24).
- **Multimodal Transportation (Section 4.18).** Bike lanes would be provided in both directions as part of the Project. Sidewalks would be provided along both sides of Woodward Road and along Sunport Boulevard between Broadway Boulevard and I-25.
- **Utility Adjustments (Section 4.19).** Reasonable permanent access to all utilities would be provided and incorporated into the design and ROW-acquisition activities. Coordination would be conducted between the County, NMDOT, and the utility owners to minimize impacts on utilities. The County would require the contractor to notify and coordinate with utility and remediation-system owners regarding the schedule and sequence of construction activities, including utility and monitoring well relocation work.
- **Hazardous Materials (Section 4.20).** Avoidance of wells and other infrastructure associated with the groundwater remediation systems would be implemented as part of the Project final design and construction. Coordination would continue between the County, NMED, EPA, and responsible parties.
- **Construction Activities (Section 4.21).** The construction contractor would implement a construction sequencing and traffic control plan, as well as the following to minimize impacts.
    - Reasonable efforts would be taken to minimize construction noise through use of low-vibration equipment and other abatement measures.
    - Solid waste generated during construction would be removed as soon as practical and managed in accordance with federal and state regulations. Dust would be minimized.

- Construction activity schedules would be communicated to and coordinated with businesses and industrial facilities in the Project area.
- Bernalillo County would adequately notify the public of planned construction activities and any rerouting of local traffic.
- A traffic control plan to maintain traffic during construction would be developed during Project final design.
- Traffic may be temporarily closed off, if necessary, during construction activities. Lane closures would be coordinated with appropriate fire and community officials.
- Construction equipment would be staged in the roadway ROW or other areas acquired by the construction contractor. Some areas may otherwise be designated to be disturbed by construction activities.
- To the extent practical, contractors would recycle roadway materials for reuse on the Project.

Appendix A– Public Notification Materials

Public Hearing Announcement and
Notice of Availability of an Environmental Assessment for the

Sunport Boulevard Extension / Woodward Road Improvements Project

CN A300160 & CN A300161

Bernalillo County, the New Mexico Department of Transportation (NMDOT), and the Federal Highway Administration (FHWA) have completed an environmental assessment (EA) for the proposed extension of Sunport Boulevard between I-25 and Broadway and associated improvements to Woodward Road between 2nd Street and Broadway. The purpose of this project is to improve roadway connectivity, and address other transportation and access needs in this area. The EA evaluates the No Build and the Build Alternative and provides detailed information about the purpose and need for the project, the major design features, and the impacts to the human and natural environments and to cultural resources.

Sunport Boulevard Extension / Woodward Road Improvements Project Public Hearing:

Thursday, July 19, 2018
6:30 – 8:30 p.m.
Mountain View Community Center
201 Prosperity Ave. SE
Albuquerque, NM 87105

The public hearing will provide a summary of the EA and the major findings, and provide an opportunity for the public to comment on the EA and the proposed action. Comments will be welcomed on bicycle and pedestrian issues as well as natural and cultural resources. Displays, information, and project representatives will be available at the hearing starting at 6 p.m. **A presentation will start at 6:30 p.m. followed by a formal public comment period.** There will be a five minute limit to verbal comments during the comment period. Additional comments may be submitted in writing, no later than July 31, 2018. Spanish translation will be provided at the meeting.

The EA is available for review online at www.bernco.gov/Sunport. Copies of the EA are available for review at the following locations from June 29 to July 31, 2018:

BernCo Public Works 2400 Broadway Blvd. SE Albuquerque, NM 87102 (505) 848-1500	Mtn. View Community Ctr 201 Prosperity Ave. SE Albuquerque, NM 87105 (505) 314-0297	Herman Sanchez Community Ctr 1830 William St. SE Albuquerque, NM 87102 (505) 848-1336	Jack Candelaria Community Ctr 400 San Jose Ave. SE Albuquerque, NM 87102 (505) 848-1324

For additional information about the hearing and / or the project, please contact either of the following:

- Rodrigo Eichwald, Project Engineer, Bernalillo County, (505) 848-1574
- Peter Hinckley, Project Manager, AECOM, (505) 855-7409

Comments on the EA and project are requested no later than July 31, 2018. Please send comments to Peter Hinckley, AECOM, 6501 Americas Parkway NE, #900, Albuquerque, NM 87110 / peter.hinckley@aecom.com or to John Taschek, Ecosphere, 1660 Old Pecos Trail, Suite H, Santa Fe, NM 87505 / jtaschek@ecosphere-services.com. Special needs or accommodations for individuals with disabilities will be provided upon request at least 48 hours in advance of the hearing by calling Catherine Lopez at (505) 224-1641.

he shooting shattered the usual tranquility. In a quiet own where the incoming lass of the U.S. Naval Academy just arrived this week and residents take pride in a rich colonial egacy, the shooting at The Capital Gazette that claimed five lives opens a new chapter in its long history.

"It feels so personal," said Mary Adams, who owns The Annapolis Bookstore and knew two of the victims. "It has shifted our community, and maybe it's made us more attuned to the fact that we are all in this together."

Adams knew Wendi Winters, the paper's special projects editor. They met years ago at a "Harry

profanity-laced tweets.

Designed more for an age of horses and buggies than SUVs, Annapolis has a baroque street plan of downtown traffic circles and diagonal streets that can make it feel distant from modern times. For some, that sense of withdrawal made Thursday's tragedy all the more shocking.

Lisa Quina, owner of an interior design studio called Barefoot Dwelling, recently moved from Baltimore — a city struggling for years to lower a high homicide rate — in search of a smaller, safer community.

One of the considerations for choosing Annapolis

Steve Samaras, who owns Zachary's Jewelers on Main Street near the City Dock, said he attended a vigil Friday night with his 12-year-old niece. He said she already was grappling with consequences of gun violence, because a friend of hers who had moved to Florida had attended Marjory Stone Douglas High School in Parkland, where 17 people died in a shooting in February.

"She said 'Uncle Steven, I'm scared.' What do you tell a 12-year-old kid? What do you tell any child?" he said.

More than 1,000 people streamed through Annapolis Friday evening to remember the victims.

Identity thief drains bank account of 112-year-old veteran in Texas

Richard Overton

ASSOCIATED PRESS

AUSTIN, Texas — Someone obtained the personal information of a Texas resident who's believed to be the oldest man in the U.S. and used it to drain his bank account.

The family of Richard Overton says Social Security and banking account numbers for the 112-year-old Austin man were used to make seven withdrawals over the past several months.

Cousin Volma Overton declined to say how much was stolen but said it was a "significant amount of money." He says the money was used to purchase savings bonds. A police report was filed Friday.

The money was separate from a 2015 online campaign that raised more than $300,000 for Overton. He is the nation's oldest World War II veteran and was at Pearl Harbor just after the Japanese attack.

The fundraiser provided around-the-clock, in-home care for Overton.

NEWS SHOWS

Lineup for today's TV news shows:

CNN's "State of the Union" (7 a.m.) — Sens. Susan Collins, R-Maine; Sen. Tammy Duckworth, D-Ill.

PBS's "Report From Santa Fe" (KNME Channel 5, 8 a.m.) — David Suzuki, geneticist, environmentalist, author of 52 books, and best known as host of the long-running CBC Television science program "The Nature of Things."

"Fox News Sunday" (KASA Channel 2, 8 a.m.) — Pre-empted by World Cup Soccer.

NBC's "Meet the Press" (KOB Channel 4, 9 a.m.) — Sens. Lindsey Graham, R-S.C., and Maria Cantwell, D-Wash.; House candidate Alexandria Ocasio-Cortez, D-N.Y.

ABC's "This Week" (KOAT Channel 7, 9 a.m.) — Collins; Sen. Amy Klobuchar, D-Minn.

CBS' "Face the Nation" (KRQE Channel 13, 9:30 a.m.) — National security adviser John Bolton; Sens. Pat Toomey, R-Pa., and Richard Blumenthal, D-Conn.; Roberta Jacobson, former ambassador to Mexico; Mark Salter, co-author with John McCain of "The Restless Wave."

Public Hearing Announcement and Notice of Availability of an Environmental Assessment for the

Sunport Boulevard Extension / Woodward Road Improvements Project

CN A300160 & CN A300161

NMDOT

U.S. Department of Transportation
Federal Highway Administration

Bernalillo County, the New Mexico Department of Transportation (NMDOT), and the Federal Highway Administration (FHWA) have completed an environmental assessment (EA) for the proposed extension of Sunport Boulevard between I-25 and Broadway and associated improvements to Woodward Road between 2nd Street and Broadway. The purpose of this project is to improve roadway connectivity, and address other transportation and access needs in this area. The EA evaluates the No Build and the Build Alternative and provides detailed information about the purpose and need for the project, the major design features, and the impacts to the human and natural environments and to cultural resources.

Sunport Boulevard Extension / Woodward Road Improvements Project Public Hearing:

Thursday, July 19, 2018
6:30 - 8:30 p.m.
Mountain View Community Center
201 Prosperity Ave. SE
Albuquerque, NM 87105

The public hearing will provide a summary of the EA and the major findings, and provide an opportunity for the public to comment on the EA and the proposed action. Comments will be welcomed on bicycle and pedestrian issues as well as natural and cultural resources. Displays, information, and project representatives will be available at the hearing starting at 6 p.m. **A presentation will start at 6:30 p.m. followed by a formal public comment period.** There will be a five minute limit to verbal comments during the comment period. Additional comments may be submitted in writing, no later than July 31, 2018. Spanish translation will be provided at the meeting.

The EA is available for review online at www.bernco.gov/Sunport. Copies of the EA are available for review at the following locations from June 29 to July 31, 2018:

BernCo Public Works 2400 Broadway Blvd. SE Albuquerque, NM 87102 (505) 848-1500	Mtn. View Community Ctr 201 Prosperity Ave. SE Albuquerque, NM 87105 (505) 314-0297	Herman Sanchez Community Ctr 1830 William St. SE Albuquerque, NM 87102 (505) 848-1336	Jack Candelaria Community Ctr 400 San Jose Ave. SE Albuquerque, NM 87102 (505) 848-1324

For additional information about the hearing and / or the project, please contact either of the following:

- Rodrigo Eichwald, Project Engineer, Bernalillo County, (505) 848-1574
- Peter Hinckley, Project Manager, AECOM, (505) 855-7409

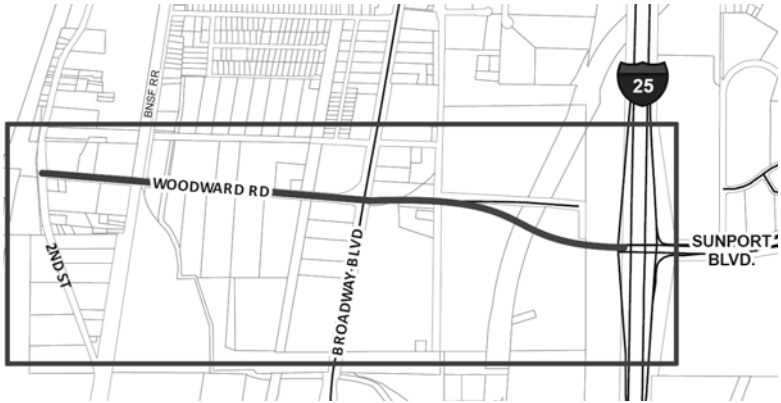
Comments on the EA and project are requested no later than July 31, 2018. Please send comments to Peter Hinckley, AECOM, 6501 Americas Parkway NE, #900, Albuquerque, NM 87110 / peter.hinckley@aecom.com or to John Taschek, Ecosphere, 1660 Old Pecos Trail, Suite H, Santa Fe, NM 87505 / jtaschek@ecosphere-services.com. Special needs or accommodations for individuals with disabilities will be provided upon request at least 48 hours in advance of the hearing by calling Catherine Lopez at (505) 224-1641.

Text IMPROVEMENTS to 43766

Commissioner Steven Michael Quezada invites residents and businesses to attend an important public hearing.

Thursday, July 19
6:30 p.m.
Mountain View Community Center
201 Prosperity Ave. SE

SUNPORT BOULEVARD EXTENSION / WOODWARD ROAD PROJECT PUBLIC HEARING



Bernalillo County Public Works Division in cooperation with the NMDOT and the Federal Highway Administration have completed an environmental assessment (EA) for the proposed extension of Sunport Boulevard between I-25 and Broadway Boulevard, and associated improvements to Woodward Road between 2nd Street and Broadway Boulevard. The purpose of this project is to improve roadway connectivity, and address other transportation and access needs in this area. The EA evaluates the No Build and the Build Alternative and provides detailed information about the purpose and need for the project, the major design features, and the impacts to the human and natural environments, and to cultural resources.

The public hearing will provide a summary of the EA and the major findings, and provide an opportunity for the public to comment on the EA and the proposed action.

El Comisionado Steven Michael Quezada invita a los residentes y negocios para que asistan a una junta pública muy importante.

Reunión Pública sobre el Proyecto de Extensión de la Calle Sunport

El jueves, 19 de julio a las 6 y media de la tarde
Mountain View Community Center
201 Prosperity Ave. SE

La División del Condado Bernalillo de Obras Públicas con la cooperación de NMDOT y la Administración Federal de Carreteras proponen una ampliación de la Calle Sunport desde la carretera interestatal I-25 al oeste hasta la calle Broadway Boulevard y mejoras a Woodward Road entre 2nd Street y Broadway Boulevard.

La reunión pública permitirá a los residentes hacer comentarios sobre el proyecto.

La interpretación en español estará disponible.

Bernalillo County
Public Works Division
2400 Broadway Blvd. SE
Albuquerque, NM 87102

PRSRT STD
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U.S. POSTAGE
PAID
EDDM RETAIL

**********ECRWSS****

Local Postal Customer

Hinckley, Peter

From: Wanda White <wwhite@ecosphere-services.com>
Sent: Monday, July 16, 2018 3:28 PM
To: JUGARCIA@BERNCO.GOV; ngarcia49@yahoo.com; aguamatic@aol.com; AGERICHS@AOL.COM; BOOKEYLUV@HOTMAIL.COM; greathousedonnie02 @gmail.com; mandy.v.griego@hud.gov; Scott_hak@me.com; mwelfi@exhib-it.com; ehebard@yahoo.com; hebert.michael@epa.gov; greg.heitmann@dot.gov; heimann@pbworld.com; dherrera@bernco.gov; Hinckley, Peter; jhinde@cabq.gov; ralphh@kinneybrick.com; THOVDA@QUIKRETE.COM; MARIAHUERTA844@GMAIL.COM; jansky.michael@epa.gov; Jenson_m-j@hotmail.com; timkarpoff@msn.com; cindykeith@gmail.com; rogerkeith@gmail.com; AOCIHK@MSN.COM; jslotkey@gmail.com; klasjeff@gmail.com; carol@eventsplus.net; L.P.KOEHLER@GMAIL.COM; aguamatic@aol.com
Subject: FW: Sunport Boulevard Extension
Attachments: AD_Sunport Public Hearing_Final_2018 0719.pdf; Email_Press Release_BernCo_2018 0711.pdf

Dear Potentially Interested Parties:

Attached is a Press Release, Public Hearing Announcement and Notice of Availability of an Environmental Assessment for the Sunport Boulevard Extension /Woodward Road Improvements Project. The Hearing will be held Thursday, July 19, 2018, 6:30 – 8:30 p.m., at the Mountain View Community Center, 201 Prosperity Ave. SE, Albuquerque, NM 87105. We thank you for your interest in this project and look forward to your continued participation.

John Taschek
Ecosphere Environmental Services, Inc.

Hinckley, Peter

From: Bernalillo County Postmaster <exchange@bernco.gov>
Sent: Wednesday, July 11, 2018 12:34 PM
Subject: BernCo News Release: Sunport Boulevard Extension / Woodward Road Public Hearing Scheduled

NEWS RELEASE

For Immediate Release
July 11, 2018

www.bernco.gov

Contact: Catherine Lopez
cathylopez@bernco.gov
O. 505.224.1641
C. 505.259.0312

Sunport Boulevard Extension and Woodward Road Improvements Project Public Hearing Scheduled

Bernalillo County – An environmental assessment on extending Sunport Boulevard and improving Woodward Road has been completed and the public will have an opportunity to receive a project update and offer comment at a hearing scheduled Thursday, July 19.

Bernalillo County, the New Mexico Department of Transportation, and the Federal Highway Administration completed the environmental assessment that addresses extending Sunport Boulevard between I-25 and Broadway Boulevard and improvements to Woodward Road between 2nd Street and Broadway Boulevard.

A public hearing is scheduled for **Thursday, July 19 at the Mountain View Community Center, 201 Prosperity Ave. SE.** An open house will take place from 6 – 6:30 p.m. and a formal presentation will begin at 6:30 p.m. followed by a public comment period. Spanish translation will be provided at the hearing.

The public hearing will provide a summary of the environmental assessment and the major findings, and provide an opportunity for the public to comment on the environmental assessment and the proposed

action. Comments will be welcomed on bicycle and pedestrian usage as well as preserving natural and cultural resources.

The purpose of this project is to improve roadway connectivity, and address other transportation and access needs in this area. The environmental assessment evaluates the necessity of the project and provides detailed information about major design features, and the impacts to the human and natural environments, and to cultural resources.

The environmental assessment is available for review online at www.bernco.gov/Sunport.

Hardcopies of the environmental assessment are available for review at the following locations through July 31, 2018:

Bernalillo County Public Works Division
2400 Broadway Blvd. SE
(505) 848-1500

Mountain View Community Center
201 Prosperity Ave. SE
(505) 314-0297

Herman Sanchez Community Center
1830 William St. SE
(505) 848-1336

Jack Candelaria Community Center
400 San Jose Ave. SE
(505) 848-1324

Comments on the environmental assessment and project should be submitted no later than July 31, 2018.

Residents and businesses are encouraged to attend the public hearing to learn more about the findings of the environmental assessment and the proposed actions of the project.

# # #

About Bernalillo County

Bernalillo County is 1,160 square miles and is New Mexico's most populous county with more than 674,000 residents. Bernalillo County government provides a wide range of public services to residents who live in Albuquerque, Los Ranchos and Tijeras and the 111,000 residents who live outside the village and city limits in the unincorporated areas of the county. Bernalillo County employs approximately 2,500 people and has an annual operating budget and capital investments of more than $500 million. Elected officials include five county commissioners, assessor, clerk, probate judge, sheriff and treasurer.

Sunport Boulevard Extension / Woodward Road Improvements
Bernalillo County Project Number TS09-06

Public Hearing Attendance

July 19, 2018 Mountain View Community Center

Name	Address	Phone	E-Mail
RICHARD MEADOWS	Bernalillo Co Public Works		rmeadows@berneco.gov
Roxanne Blatt	AECOM	505-855-7438	roxanne.blatt@aecom.com
Claudia Diaz		(505)877-7717	claudia.21993@yahoo.com
ROGER PAUL	BERN. CO. PUBLIC WORKS	848-1515	ROGERP@BERNCO.GOV
Brian Lopez	Bern Co Public Works	848-1525	bjlopez@bernco.gov
Hilda Ewing	121 Washington Cove SE		
Tandy Freel	7500 Jefferson ST NE	823 1000	tfreel@bhinc.com
Nora Garcia	236 Sunnyslope St. SW.	414-1621	ngarcia49@yahoo.com
Esther Abeyta	2419 William SE	4401669	sjna1@live.com
Eugene Candelaria	2904 John ST. SE	203-7741	

AECOM

AECOM
One Park Square
6501 Americas Parkway, Suite 900
Albuquerque, NM 87110-6367

Sunport Boulevard Extension / Woodward Road Improvements
Bernalillo County Project Number TS09-06

Public Hearing Attendance

July 19, 2018 Mountain View Community Center

Name	Address	Phone	E-Mail
Brian L. Bailey	8717 Lagrima de Oro Rd ABQ 87111	235-4559	br, refone@msn.com
Ross Lujan	6501 Americas Parkway, Ste 900	855-7492	ross.lujan@aecom.com
Patrick A Reynolds	120 Woodward Rd	3281710	maparey nol@AOL.com
Juan Reynosa	211 10th St. SW, ABQ NM	242-8832	juaneswop.net
Diane Dolan	PO Box 1293	768-3186	ddolan@cabq.gov
Enrico Gradi	111 Union Square SE.	314 0385	EGRADI@BERNCO.GOV
Jo Schwartzman	3215 2ND ST SW.	—	—
Sean Sullivan	335 Woodward	463-6626	Royalempanocatering@gmail.com
Leo Johnson	507 Wesmeco SE	315.5048	leojunejohnson@gmail.com
Mr. Mrs Hermandjerra	904 Ross SE	—	—

AECOM

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6501 Americas Parkway, Suite 900
Albuquerque, NM 87110-6367

Sunport Boulevard Extension / Woodward Road Improvements
Bernalillo County Project Number TS09-06

Public Hearing Attendance

July 19, 2018 Mountain View Community Center

Name	Address	Phone	E-Mail
Frank Duran		345-8652	~~frank~~ fduran@MCT.com
JULIE LUNA	2400 Broadway SE	848-1508	jaluna@bernco.gov
Gloria Aubert	2200 William St SE	5055736353	gloriaubert@hotmail.com
David Wood	158 Pleasant NW	221-2626	wood_cpa@msn.com
Bert Thomas	7500 Jefferson NE	823-1000	athomas@bhinc.com
Steven Abeyta	2419 William St SE	440 2086	stevenabeyta@gmail.com
Michael Jensen	8711 Los Arboles Ave NE	362-1063	mjenson@nmetc.org
Robert Archuleta	304 Plaza Muchomas	681-1554	rarchuleta@mct-ind.com
Albert Chavez	1449 Sandia Rd SW	877 1635	
David Pernella	216 12th St NW ABQ 87102	—	mapperdp@yahoo.com

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Public Hearing Attendance

July 19, 2018 Mountain View Community Center

Name	Address	Phone	E-Mail
Laura Martinez	340 Abajo rd SE		laura.garcia505@gmail.com
Esther Rothke	211 Abajo Rd SE		rekhilo@hawaiiantel.net
Susannah Clary	4107 Montgomery Blvd		sclary@tierra-row.com
Wayne Elliott	120 Woodward Rd	328 0989	Elliottlocation@yahoo.com
Robert BACA	402 Bethel S.E.		RBACA@ymail.com
Mikyle Gray	4300 Bryn Mawr Dr NE Apt 53		Mikyle@swop.net
Sybil Weathers	3516 Chalmers SW		iwildo@comcast.net
Mark Rudd	506 Valley High SW	270-5449	mark@markrudd.com
Sam Baca	7420 Reading Ave. SE	975-2374	samb@auiinc.net
CAROL PHIFER	1402 HIGH ST SE		cephifer@msn.com

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Public Hearing Attendance

July 19, 2018 Mountain View Community Center

Name	Address	Phone	E-Mail
John Hunter	221 Rossmoor SW	2490605	
Paulan Dodge	9512 Cerro Largo	250-2585	pdodge-kwan@cabq.gov
Marylou Baca	404 Bethel SE	2033673	mloubaca@gmail.com
Mauro Silva	5005 5th Street SW 87105	720-4539	alcoatl944@gmail.com
Rachel Riboni	224 Rio Abajo SE	505 833-0301	
Bianca Encinias			nmcorazon75@gmail.com
Jennifer Overwhite	Valle de Oro	505-933-2700	jennifer_overwhite@fws.gov
Sylvia Reza	Sheldon SE	269-3293	
Marisol Archuleta	3615 Big Lottonwood SW	400-4815	lindsaymarisol@yahoo.com
Mark Fahey	2428 Criss SW	250-1847	~~mark.fahey~~ markfahey@q.com

AECOM

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Albuquerque, NM 87110-6367

Sunport Boulevard Extension / Woodward Road Improvements
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Public Hearing Attendance

July 19, 2018 Mountain View Community Center

Name	Address	Phone	E-Mail
Nan Morningstar	2022 Edith Blvd SE		nan@freeradicals
Elvira Lopez	Bernalillo County	314-0384	ellopez@bernco.gov.
Andrés Tamayo	4503 Valley Park Dr SW		—
Paul M Cha	2209 Elm SE	242-0229	—
Mike Conway	1524 CENTRAL SE	4505714	
Ray Kottke	211 Atrajo Rd SE	440-5786	rekhilo@swcentral.net
Olivia Price	408 Bethel Dr. SE		NONE.
Greg Bond	233 Camino Nos SW	907-4838	
Lisa neie	4001 Office Ct. Dr #801	505-820-2036	lisa.neie@dot.gov
Mary Lovato			mary.lovato@state.nm.us

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Sunport Boulevard Extension / Woodward Road Improvements
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Public Hearing Attendance

July 19, 2018 Mountain View Community Center

Name	Address	Phone	E-Mail
Ken Maestas	2401 Aztec NE	241.4436	Ken.maestas@pnm.com
Luke Smith	8008 Escarpment Ave NW	373-7411	Luke.Smith@state.nm.us
NATE MOODI	2022 EDITH SE	—	—
Blake Roxlau		827-5224	blak.roxlau@state.nm.us
DEAN LARRAÑAGA	3024 BROADWAY SE		
Bernice Chavez	2209 Elm SE	2420229	
Becky Carrillo	338 Abajo Rd SE	948-6866	Carrillo69@gmail.com
Marguerite Johnson	NMDOT	490-3502	Marguerite.johnson@state.nm.us
Moby Mirza	COA	768-2680	mmirza@cabq.gov
Catherine VerEecke	Bernalillo County Planning	314-0387	cvereecke@bernco.gov

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Public Hearing Attendance

July 19, 2018 Mountain View Community Center

Name	Address	Phone	E-Mail
Irene Entila	415 Columbia Dr SE 87106		ientila@icloud.com
Bonnie Martinez	7451 Pan American Fwy NE 87109	(505) 345-8651	bonnie_net@yahoo
Roberto Roibal	2233 Don Felipe Rd SW 87105	2478832	roberto@swop.net
Art DeLaCruz	1800 Elena Cir SW	203-1005	artdelacruz1@comcast.net
Rod Mahoney	1838 Sadora Rd SW 87105	681-3600	rmahoney21@comcast.net
MARIA GLOBUS	5315 Shirk Ln SW	877.1116	mlglobus@gmail.com
Roger Keith	2301 Stieglitz Ave SE	873 3541	rogerkeith@gmail.com
Daniel Chavez	924 Ross Ave SE	907-2978	Danielchavez750@gmail.com
Russell Fain	2214 William St. SE	818-9130	russfain.fain@gmail.com
Jill Mosher	NMDOT D3	553-5174	Jill.Mosher@state.nm.us

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One Park Square
6501 Americas Parkway, Suite 900
Albuquerque, NM 87110-6367

Sunport Boulevard Extension / Woodward Road Improvements
Bernalillo County Project Number TS09-06

Public Hearing Attendance

July 19, 2018 Mountain View Community Center

Name	Address	Phone	E-Mail
Evelyn Costello	1807 Del Norte SW	877-9288	evelyncostello@msn.com
KEITH MEYER	9426 RIO GRANDE BLVD NW	878-0009	KEITH MEYER@GOTSPACEVIA.COM
Elaine Kapusainski	150 Woodward	3851260	abigkap@msn.com elainybugs@msn.com
VICTOR LARRANAGA	3024 Broadway S.E.	220-1610	
KEVIN EADES	2701 MILES ROAD	242-5700	KEADES@MOLZENCORBIN.COM
RICHARD MOORE	303 LA VEGA DR. S.W	301-0276	LJINEWMEXICO@GMAIL.COM
Michelle Lune	Commission Aide		mlune@bernco.gov.
Dean Ford	748 Woodward Dr. S.E.	858-0300	dean@stecoatings.com
Alfred H Volden	3215 2nd St S.W. 87105	877-2311	a.volden@usa.net
EDWARD GERETY	1414 San Carlos SW	—	edward.gerety@gmail

AECOM

AECOM
One Park Square
6501 Americas Parkway, Suite 900
Albuquerque, NM 87110-6367

Sunport Boulevard Extension / Woodward Road Improvements
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July 19, 2018 Mountain View Community Center

Name	Address	Phone	E-Mail
Frances Armijo	915 William SE	247-8749	fparmijo@gmail.com
Chastine Jaramillo	212 Avenida Cesar Chavez SE	2345156	chastine@gmail.com
Angela D. Vigil	2714 Santa Clara SE		gopackgo123@hotmail.com
Jerald Widdism	3333 Wilway Ave. NE	256-0740	N/A

AECOM

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One Park Square
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Sunport Boulevard Extension / Woodward Road Improvements
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Name	Address	Phone	E-Mail
Jessica & Oscar Lozoya	1205 Broadway SE	243-1007	xupose@gmail.com
Raul and Ruth Sanchez	PO Box 7163 ABQNM 87194	545-9002	
Lorena Aragon	1127 Walter NE	270-7716	lnjalopez@msn.com

AECOM

AECOM
One Park Square
6501 Americas Parkway, Suite 900
Albuquerque, NM 87110-6367

Appendix B – Agency Correspondence

Ecosphere
Environmental Services

Durango, CO
Pagosa Springs, CO
Farmington, NM
Santa Fe, NM

April 20, 2018

RE: Environmental Assessment: Sunport Boulevard Extension: Broadway Boulevard to Interstate 25 and Woodward Road Improvements: Second Street to Broadway Boulevard (NMDOT Control Numbers [CNs]: A300160 and A300161)

Dear Agency Representative or Interested Party:

The Bernalillo County Public Works Division (County), in cooperation with the New Mexico Department of Transportation (NMDOT) and Federal Highway Administration (FHWA), propose to extend Sunport Boulevard from its current terminus at Interstate 25 (I-25) to the Broadway Boulevard/Woodward Road intersection, and improve Woodward Road along its existing alignment from Broadway Boulevard to Second Street (the Project). The Project is located within Bernalillo County and portions of the city of Albuquerque, New Mexico (see attached figure). The FHWA and NMDOT are providing oversight; federal funding is designated for the Project through the FHWA.

An environmental assessment (EA) is being prepared for the Project in compliance with the National Environmental Policy Act of 1969 (NEPA), including environmental analysis of alternatives and public involvement. This EA combines two proposed undertakings, the *Sunport Boulevard Extension: Broadway Boulevard to Interstate 25* (CN 300160) and the *Woodward Road Improvements: Second Street to Broadway Boulevard* (CN 300161). The process is intended to inform stakeholders of the potential consequences of the Project and to solicit input, thus affecting the decision-making process.

The purpose of the proposed Project is to improve roadway system and multimodal connectivity from the I-25/Sunport Interchange to Broadway Boulevard and Second Street. A variety of alternatives to address the need for improvements in this corridor were considered as part of prior studies conducted between 2010 and 2016. In 2016, the County concluded that the Sunport Boulevard Extension and Woodward Road Improvements should be evaluated as a combined project. The Preferred Alternative in the EA was identified as the recommended approach based on engineering feasibility, simplicity, cost, environmental factors, and other considerations.

The Preferred Alternative for the Sunport Boulevard Extension consists of constructing a four-lane median-divided urban arterial roadway from the intersection of Broadway Boulevard and Woodward Road east to the existing interchange of Sunport Boulevard and I-25, for approximately 0.5 mile. Bike lanes and sidewalks would be included as part of the typical roadway cross section, connecting Broadway Boulevard to the east side of the Sunport Boulevard/I-25 interchange. The roadway would contain twin bridges over the existing Albuquerque Metropolitan Arroyo Flood Control Authority's South Diversion Channel. Traffic signals would also be needed at the intersections of Sunport Boulevard and I-25 northbound and southbound interstate ramps.

The Preferred Alternative for the Woodward Road Improvements would consist of a three-lane configuration with two travel lanes, a continuous left-turn lane, two bike lanes, standard curb and gutter, and sidewalks on both sides of the roadway. The proposed improvements would extend approximately 0.58 mile. A signal would also be needed at the intersection of Second Street and Woodward Road to accommodate traffic.

Public involvement has been attained as part of the Project to solicit input at key milestones. During the past eight years, five public meetings and numerous agency and stakeholder consultations have taken place, and additional public involvement and agency coordination are ongoing. The NEPA process requires coordination with pertinent agencies and interested parties. Your review and comments on the Project are important elements of this process. The comment period will extend until June 15, 2018.

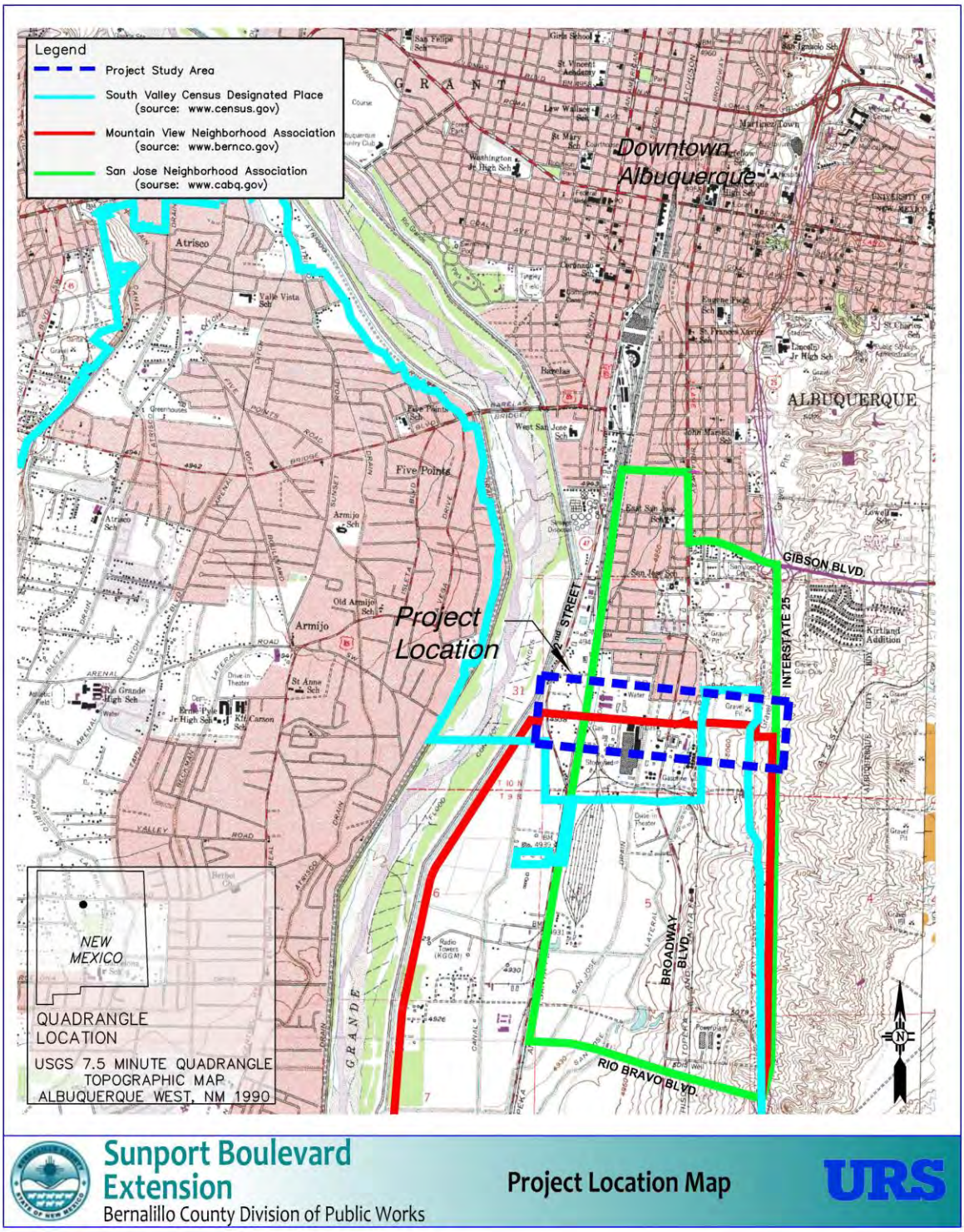
For further information, copies of the EA, and/or to submit comments, please contact the following project consultant representative:

John Taschek, Senior Project Manager
Ecosphere Environmental Services, Inc.
1660 Old Santa Fe Trail, Suite H
Santa Fe, New Mexico 87505
(505) 980-0993
jtaschek@ecosphere-services.com

We appreciate your interest and participation in this project, and look forward to your comments.

Sincerely,

John Taschek, Senior Project Manager
Ecosphere Environmental Services, Inc.


Legend
Project Study Area
South Valley Census Designated Place (source: www.census.gov)
Mountain View Neighborhood Association (source: www.bernco.gov)
San Jose Neighborhood Association (sourse: www.cabq.gov)
Downtown Albuquerque
Project Location
ALBUQUERQUE
GIBSON BLVD.
INTERSTATE 25
BROADWAY BLVD.
RIO BRAVO BLVD.
Five Points
Atrisco
Armijo
NEW MEXICO
QUADRANGLE LOCATION
USGS 7.5 MINUTE QUADRANGLE TOPOGRAPHIC MAP
ALBUQUERQUE WEST, NM 1990
Sunport Boulevard Extension
Bernalillo County Division of Public Works
Project Location Map
URS

AGENCY CORRESPONDENCE LIST

U.S. Fish and Wildlife Service *
New Mexico Ecological Services Office
Wally Murphy, Field Office Supervisor
2105 Osuna Road, NE
Albuquerque, New Mexico 87113-1001

U.S. Army Corps of Engineers
Albuquerque District
NM/TX Branch
Lesley McWhirter, Branch Chief
4101 Jefferson Plaza, N.E., Rm. 313
Albuquerque, NM 87109-3435

U.S. Department of Agriculture
Natural Resources Conservation Service
Albuquerque Service Center
Dennis Alexander, State Conservationist
6200 Jefferson, N.E.
Albuquerque, New Mexico 87109

U.S. Bureau of Reclamation
Albuquerque Area
Nancy Umbreit
555 Broadway Blvd. NE
Albuquerque, NM 87102-2752

U.S. Environmental Protection Agency
Superfund Program
Region 6 Compliance Assurance and Enforcement Division
6SF-RL, Superfund Program
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Air Planning Section
EPA Region 6, 6 PD-L
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Director of Transportation
Mid-Region Council of Governments
Transportation and Planning Services
809 Copper Avenue, N.W.
Albuquerque, New Mexico 87102

Nathan Masek, Transportation Planner
Mid-Region Council of Governments
Transportation and Planning Services
809 Copper Avenue, N.W.
Albuquerque, New Mexico 87102

N.M. Environmental Department
Environmental Impact Review Coordinator
PO Box 5469
1190 St. Francis Drive, Suite N4050
Santa Fe, New Mexico 87505

Chief
New Mexico Environment Department
Air Quality Bureau
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Santa Fe, NM 87505-1816

Chief
N.M. Environment Department
Surface Water Quality Bureau
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Santa Fe, New Mexico 87505

N.M. Environment Department
Ground Water Quality Bureau
P.O. Box 5469
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Santa Fe, New Mexico 87505

Chief
New Mexico Environment Department
Drinking Water Bureau
PO 5469
Santa Fe, NM 87502

Chief
New Mexico Environment Department
Solid Waste Bureau
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N.M. Environment Department
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N.M. Department of Game and Fish
Conservation Services Division
P.O. Box 25112
Santa Fe, New Mexico 87504

N.M. Energy, Minerals, and Natural
Resources Department **
Forestry Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

State Engineer
N.M. Office of State Engineer
P.O. Box 25102
Santa Fe, New Mexico 87504-5102

N.M. Department of Homeland
Security Emergency Management
Department Secretary
13 Bataan Blvd.
Santa Fe, New Mexico 87504

Director
New Mexico State Parks Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Aubrey Dunn, Commissioner
New Mexico State Land Office
310 Old Santa Fe Trail
Santa Fe, NM 87501

Principal Planner
City of Albuquerque
Municipal Development Department
Transportation Division
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One Civic Plaza, Room 7057
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Section Manager
Municipal Development Department,
Transportation Division
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Albuquerque, New Mexico 87103

Environmental Compliance Officer
City of Albuquerque Aviation Department
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2200 Sunport Blvd., SE
Albuquerque, New Mexico 87106

Albuquerque Bernalillo County
Water Utilities Authority
PO Box 1293
One Civic Plaza, NW
Room 5012
Albuquerque, NM 87103

Albuquerque Metropolitan Arroyo
Flood Control Authority
2600 Prospect Avenue
Albuquerque, NM 87107

City of Albuquerque
Environmental Health/Air Quality Division
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1 Civic Plaza, Room 3047
Albuquerque, NM 87102

Commissioner Steven Michael Quezada
Bernalillo County Commission, District 2
One Civic Plaza, N.W., 10th Floor
Albuquerque, New Mexico 87102

Julie Morgas Baca, County Manager
Bernalillo County
One Civic Plaza, N.W., 10th Floor
Albuquerque, New Mexico 87102

Bernalillo County Floodplain Administrator
2400 Broadway, S.E.
Building N
Albuquerque, NM 87102

Councilor Isaac Benton
City-County Building - 9th Floor
One Civic Plaza, N.W., 10th Floor
Albuquerque, New Mexico 87102

Representative G. Andrés Romero
New Mexico House of Representatives
4503 Valley Park Dr. SW
Albuquerque, NM 87105

Senator Gerald Ortiz y Pino
New Mexico State Senate-District 12
400 12th Street NW
Albuquerque, NM 87102

Senator Michael Padilla
New Mexico State Senate-District 14
PO Box 67545
Albuquerque, NM 87193

U.S. Department
of Transportation
**Federal Highway
Administration**

Office of the Administrator

1200 New Jersey Ave., SE
Washington, D.C. 20590

July 3, 2018

In Reply Refer To:
HEPE

The Honorable Timothy M. Keller
Mayor of Albuquerque
Albuquerque, NM 87103

Dear Mayor Keller:

Thank you for your letter informing us that the city of Albuquerque no longer supports the Sunport Boulevard Extension Project. We appreciate knowing of your concerns.

The Federal Highway Administration (FHWA) does not decide which projects to advance. Instead, we make Federal-aid highway funds available to the State transportation departments by formula. They work with local officials to decide which projects to fund and are responsible for project development, subject to our oversight.

The Mid-Region Metropolitan Planning Organization (MRMPO) has included the Sunport Boulevard Extension Project in its approved transportation improvement program with the longstanding support of the city of Albuquerque. Bernalillo County and the New Mexico Department of Transportation (NMDOT) are developing the project. The officials at MRMPO and NMDOT may be able to address your concerns.

Our Division Administrator in the State, Mr. J. Don Martinez, and his staff are available to work with State and local officials if they wish to discuss FHWA's role in the project.

Sincerely,

Brandye L. Hendrickson

Brandye L. Hendrickson
Acting Administrator

CITY OF ALBUQUERQUE

Office of the Mayor/ Chief Administrative Officer

May 1, 2018

Mr. Jeffrey Paniati, Executive Director
Office of the Highway Administrator
Southeast Federal Center Building
1200 New Jersey Avenue SE
Washington, DC 20590-9898

Re: Sunport Boulevard Extension

Dear Mr. Paniati:

The purpose of this letter is to withdraw the City of Albuquerque's support for the Sunport Boulevard Extension Project from I-25 to Broadway.

The Sunport Extension Project has raised issues regarding community participation and opposition, concerns about noise and traffic, and the development consequences that would come from the Project. Because those concerns have not been adequately addressed, the Mayor Keller's administration cannot continue to support this Project with its vote on regional transportation authorities and boards.

PO Box 1293

Albuquerque

New Mexico 87103

www.cabq.gov

Best regards,

Timothy Keller

Timothy M. Keller
Mayor

cc: Patrick Montoya, Director, Department of Municipal Development

FHWA-180511-004

U.S. Department
of Transportation
**Federal Highway
Administration**

New Mexico Division
4001 Office Ct. Dr., Ste. 801
Santa Fe, NM 87507

In Reply Refer To:
CN A300160

September 2, 2010

SUBJECT: Sunport Boulevard Extension Project, Bernalillo County, New Mexico

090413

RECEIVED
SEP 2 2010
HISTORIC PRESERVATION DIVISION

District 3, Cultural Resource Investigations

Ms. Jan Biella
State Historic Preservation Officer
Historic Preservation Division
Bataan Memorial Building
407 Galisteo Street, Suite 236
Santa Fe, New Mexico 87501

Dear Ms. Biella:

Enclosed is a copy of Parametrix Report No. 2010-23, *A Cultural Resource Survey for Sunport Boulevard Extension Project, Bernalillo County, New Mexico* (New Mexico Cultural Resource Information System Activity Number 118071). Bernalillo County—in cooperation with the New Mexico Department of Transportation (NMDOT) and the Federal Highway Administration (FHWA)—is proposing an extension of Sunport Boulevard from the existing Sunport Boulevard Interchange with Interstate 25 (I-25) west to Broadway Boulevard (NM 47) in southeastern Albuquerque, New Mexico. The proposed project will (a) reduce traffic congestion on the adjacent roadways, including Gibson Boulevard, Rio Bravo Boulevard, and Broadway Boulevard and (b) will close a gap in the area's transportation system and provide roadway continuity.

This undertaking is included in the Mid Region Council of Governments' (MRCOG) 2010 to 2015 Statewide Transportation Improvement Plan (STIP). In the STIP, the project is identified as CN A300160, Federal ID 09NM006. Federal funds are shown as STP-U and TCSP. The project is also included in the *New Mexico Department of Transportation ARRA Statewide Transportation Improvement Program FY 2010*, approved by the New Mexico State Transportation Commission, FHWA, and Federal Transit Administration on March 23, 2010. The FHWA is the lead federal agency for the proposed undertaking and Bernalillo County is the project sponsor.

In order to comply with federal guidelines such as Section 106 of the National Historic Preservation Act (NHPA), Bernalillo County contracted with Parametrix to conduct a cultural resource survey of the area of potential effects (APE) for the proposed project. URS Corporation (URS) was contracted to design engineering plans for the proposed road extension and assist Bernalillo County in compliance with environmental regulations. The APE was defined in consultation with Bernalillo County, URS, NMDOT, and Historic Preservation Division (HPD) guidelines as a linear alignment containing 3.5 hectares (8.6 acres [ac]). The APE includes the construction footprint as well as a 15-meter (m) (50-ft) buffer that was visually inspected for standing historic buildings, structures, or objects that may be affected by the

RECOVERY.GOV

proposed undertaking. Due to the nature of construction plans, the APE varies in width, although it averages 130 ft (39.6 m). While the proposed alignment is 0.46 mi long, the APE was expanded to 0.61 mi in length, in order to include the San Jose Drain at the west end of the project area and assess the impact of the project on this cultural resource. The proposed project consists of NMDOT right-of-way, Bernalillo County lands, and private property.

The project area is located in southeast Albuquerque, New Mexico, east of the Rio Grande and west of I-25. It is shown on the *Albuquerque West (1990)* 7.5-minute United States Geological Survey (USGS) quadrangle. The project area occupies portions of Sections 32 and 33 of Township 10 North, Range 3 East.

On May 21 and 22, Parametrix conducted an intensive (100 percent) pedestrian cultural resource survey of the APE. As a result of this investigation, two newly discovered archaeological sites (LA 167700 and LA 167701), two historic/modern diversion channel segments (South Diversion Channel and San Jose Drain), and one isolated occurrence (IO) were documented during the current investigation. The latter resource—the single IO—has not, and is not likely to provide important information to better our understanding of prehistory or history and is therefore recommended ineligible for listing in the National Register of Historic Places (NRHP) under any criteria. No further investigations are recommended for this resource.

Parametrix recommends a preliminary eligibility of *undetermined* for LA 167700 and LA 167701, as archaeological testing is required to confirm the presence of subsurface deposits and assess whether these sites will contribute to a better understanding of the prehistory of the region. Both LA 167700 and LA 167701 should be avoided by all project-related activities until an eligibility determination can be made. If complete avoidance is feasible, subject to consultation and comment, the proposed undertaking will have *no effect* on these resources. If avoidance is not possible, Parametrix recommends that a limited testing plan be implemented under existing survey permit NM-10-121-S and per the New Mexico Administrative Code (NMAC) 4.10.16. The testing program will be designed to identify the nature and extent of subsurface archaeological deposits within the APE and determine if each site contains elements that merit eligibility to the National Register of Historic Places (NRHP). If either site is determined eligible and if elements contributing to its eligibility will be affected by the proposed undertaking, the project proponent should prepare a data recovery plan per NMAC 4.10.8 and to the standards within NMAC 4.10.16

The two historic/modern diversion channels have previously been recommended as eligible for inclusion to the NRHP under Criteria A and C based on the fact that they have played an important role in the economic development of the area and represent a link between past and present for local communities. These ditches continue to play an important role in the community as flood control devices and irrigation systems and are integral to the development of Albuquerque's infrastructure and expansion by diverting storm-water runoff away from developed areas and into the Rio Grande.

A bridge will be constructed over the South Diversion Channel, and project plans indicate the resource will not be altered during construction. Although construction of this bridge constitutes a visual modification, the area is already highly developed and industrialized, and numerous roads cross the channel in the immediate vicinity of the recorded segment. Furthermore, the undertaking is consistent with both the character of the area and the original purpose of the South Diversion Channel as a functioning element of Albuquerque's infrastructure. The channel will continue to operate as designed and no historically important features will be affected. Subject to consultation and comment, Parametrix recommends that the proposed improvements will have *no adverse effect* on the qualities that make the flood control/irrigation system eligible to the NRHP. No additional investigation or treatment is recommended for the South Diversion Channel.

Although the survey area was extended across the San Jose Drain in order to update and fully assess any impact the project may have on this resource, project plans indicate that the San Jose Drain will not be affected by the Alignment A alternative. Therefore, the San Jose Drain will continue to operate as designed and no historically important features will be affected. Subject to consultation and comment, Parametrix recommends that the proposed improvements will have *no effect* on the qualities that make the flood control/irrigation system eligible to the NRHP. No additional investigation or treatment is recommended for the San Jose Drain.

Consultation has been initiated by Parametrix on behalf of the lead agency with the following Native American governments: the Hopi Tribe, the Pueblo of Isleta, the Pueblo of Laguna, Ohkay Owingeh Pueblo, the Pueblo of Sandia, the White Mountain Apache Tribe, Ysleta del Sur Pueblo, and the Navajo Nation. To date, no responses have been received that indicate the proposed undertaking will have an effect on any objects, sites, or locations of traditional religious importance.

Based on the results of this investigation, subject to consultation and comment, the proposed undertaking will have *no adverse effect* on any historic properties listed on, or eligible to, the NRHP. However, if buried cultural deposits are discovered during project activities, work should cease immediately and the County of Bernaillo, FHWA, the NMDOT Cultural Resources Section, and your office should be notified.

Your concurrence is requested for the Sunport Boulevard Extension Project, Bernailo County.

Sincerely,

Gregory L. Heitmann
FHWA Environmental Specialist
Lead Agency

For: J. Don Martinez
Division Administrator

R. Blake Roxlau
NMDOT Cultural Resources Bureau Manager

For: Gary L.J. Giron
NMDOT Cabinet Secretary

Enclosure

Concurrence: Michelle Ensey 10/4/10
for Ms. Jan Biella
State Historic Preservation Officer

Comments:

Susana Martinez
Governor

STATE OF NEW MEXICO
DEPARTMENT OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

BATAAN MEMORIAL BUILDING
407 GALISTEO STREET, SUITE 236
SANTA FE, NEW MEXICO 87501
PHONE (505) 827-6320 FAX (505) 827-6338

June 3, 2016

Rick Wessel
Cultural Resources Coordinator
NMDOT Environmental Section
P.O. Box 1149
Santa Fe, New Mexico 87504

RE: *A Cultural Resources Survey for Proposed NMDOT Road Improvements Along Woodward Road in Southern Albuquerque, Bernalillo County, New Mexico* (HPD log 103721)

Dear Mr. Wessel,

On behalf of the New Mexico State Historic Preservation Officer (SHPO), Historic Preservation Division Architect Barbara Zook and I have completed a review of the aforementioned report. This letter provides SHPO comments on the determinations of eligibility for the properties identified, and the finding of effect.

The SHPO concurs that Historic Cultural Properties Inventory (HCPIs) 31552, 38968, 40066, 40070, 40071, 40072, and 40073 are eligible for listing in the National Register of Historic Places (NRHP).

The SHPO also concurs that HCPIs 40064, 40068, and 40069 are not eligible for listing in the NRHP under any criteria.

The SHPO does not concur that HCPIs 40065 and 40067 are not eligible for the NRHP. It is the SHPO's opinion that HCPI 40065 is a mid-century modern gas station that could be eligible individually for the NRHP or eligible under a Multiple Property Nomination of NM gas stations under Significance Criterion C (architecture). HCPI 40067 is a classic Pueblo Revival style house, which although vacant and burned still maintains integrity of locations, setting, design and materials. It is eligible for the NRHP under Criterion C for its architectural style. Because the FHWA and SHPO disagree on the eligibility of these two properties, their eligibility is undetermined.

The SHPO concurs that the project will have no adverse effect on historic properties.

If you have any questions or comments, please feel free to call m directly at 505-827-4225 or email me.

Sincerely,

Bob Estes

Bob Estes Ph.D.
HPD staff Archaeologist

U.S. Department of Transportation
Federal Highway Administration

New Mexico Division
4001 Office Court Drive
Suite 801
Santa Fe, NM 87507
505-820-2021

In Reply Refer To:

ENVI 2
CN 300161

June 1, 2016

Dr. Jeff Pappas
State Historic Preservation Officer
Office of Cultural Affairs
Historic Preservation Division
407 Galisteo, Suite 236
Santa Fe, New Mexico 87501

Dear Dr. Pappas:

Please find enclosed for your review a report titled *A Cultural Resource Survey for Proposed Road Improvements along Woodward Road in Southern Albuquerque, Bernalillo County, New Mexico* (Okun Consulting; NMCRIS 134807). Bernalillo County, in cooperation with the New Mexico Department of Transportation (NMDOT) and the Federal Highway Administration (FHWA), is proposing improvements to Woodward Road to accommodate anticipated increased traffic from the future construction of Sunport Boulevard Extension. This project is referred to as NMDOT CN 300161 and will be funded with federal monies from FHWA.

FHWA is the lead federal agency for Section 106 consultation and is taking the administrative lead in completing coordination with land managing agencies and your office in order to meet requirements of Section 106 of the National Historic Preservation Act of 1966, as amended through 1992, and in accordance with 36 CFR 800.7 (August 5, 2004). The proposed Woodward Road improvements will occur on City of Albuquerque land and Bernalillo County land.

Bernalillo County retained the services of URS/AECOM, who in turn retained Okun Consulting Solutions to perform a cultural resources survey of the area of potential effect (APE). A total of 12.5 acres was surveyed: City of Albuquerque 11.1 acres and Bernalillo County 1.4 acres. Seven historic buildings, four acequias, one historic railroad, and one descanso were recorded.

HCPI 31552 is the BNSF Railway, formerly the Atchison, Topeka and Santa Fe Railway. This rail line was previously considered eligible under Criteria A. Woodward will be widened at this location and quad gates and new signals will be added. The project will have no adverse effect on this historic property.

HCPI 38968 is the San Jose Interior Drain which shows up on a 1947 aerial image. The Drain is considered eligible under Criteria A. The portion of the Drain within the project area has been concrete lined. The culvert will need to be extended at this location, but the project will have no adverse effect on this property.

HCPI 40064 is a house that was constructed sometime after 1947 and before 1954 according to aerial imagery. It is not considered eligible to the National Register of Historic Places (NRHP).

HCPI 40065 was a gas station that was moved to its present location sometime after 1973 according to aerial imagery. The building is considered not eligible to the NRHP.

HCPI 40066 is a house that was constructed sometime between 1947 and 1954. It is considered eligible to the NRHP under Criteria A. The project will be designed to have no effect to this property.

HCPI 40067 is a house constructed sometime in the 1920s. It is one of the earliest buildings in this area of the South Valley of Albuquerque, but the building has burned and is not eligible to the NRHP.

HCPI 40068 is a commercial building that was constructed sometime after 1947 and before 1954. With a later addition altering the building configuration, this is considered not eligible to the NRHP.

HCPI 40069 is a commercial building that was constructed between 1954 and 1959. The building has been added on to over the years and is considered not eligible to the NRHP.

HCPI 40070 is a commercial building that was constructed by 1954. Although the consultant recommends the building as not eligible, NMDOT is of the opinion the building exemplifies the rise of industry in the South Valley and is eligible to the NRHP under Criteria A and C. The project will be designed to have no effect on this property.

HCPI 40071 is a lateral of the Barr Main Canal and is referred to as Lateral No. 1. It shows up on a 1947 aerial paralleling 2nd Street on the east side, and crossing under 2nd Street. The lateral is considered eligible to the NRHP under Criteria A. The culvert carrying Lateral No. 1 under 2nd Street will be extended and might require headwalls at both the inlet and outlet. The portion of Lateral No. 1 along the east side of 2nd Street will be avoided by the widening of the street. The project will have no adverse effect on this property.

HCPI 40072 is an unnamed lateral of the Barr Main Canal and is visible on a 1947 aerial image. This lateral is considered eligible under Criteria A. A pipeline will cross 2nd Street and this location and will be installed under the ditch where it will convey runoff into a drainage pond. The ditch will be restored in kind after the installation of the pipe, and the ditch will continue to function as intended. The project will have no adverse effect on this lateral.

HCPI 40073 is comprised of four previously undocumented segments of the San Jose Lateral, also known as the Barelas Ditch. Segment 1 will require an extension to accommodate the widening of Woodward and will required inlet and outlet improvements. Segment 2 will be avoided except at the crossing at William Street. Curb returns at this location will require an extension of the culvert carrying the lateral under William Street and possibly new headwalls at the inlet and outlet. Segments 3 and 4 are outside the right of way and will be avoided by project activities. The project will have a no adverse effect on these resources.

In June 2015, the NMDOT Tribal Consultation Coordinator conducted traditional cultural property inquiries for tribal entities that have expressed interest in projects in Bernalillo County. So far, no responses have been received.

FHWA and NMDOT have determined that the proposed project along Woodward Road will have no adverse effect to the cultural properties identified in the project area along Woodward Road and Second Street. Your concurrence with a *no adverse effect* to historic properties is requested.

Sincerely,

Gregory L. Heitmann
FHWA Environmental Specialist
Lead Agency

For: J. Don Martinez
FHWA Division Administrator

Rick Wessel
NMDOT Cultural Resources Coordinator

For: Tom Church
NMDOT Cabinet Secretary

\gad\CN 300161

Concurrence: _____ Date _____
Dr. Jeff Pappas
New Mexico State Historic Preservation Officer

COMMENTS:

Woodward Road Improvements Project CN 300161 Cultural Resources Table

HCPI #	Type	Eligibility Recommendation	Criteria	Effect	Treatment	SHPO Concurrence/ Comments
31552	BNSF RR	Eligible	A	No adverse effect	Quad gates and new signals added	
38968	San Jose Interior Drain	Eligible	A	No adverse effect	Culvert extension	
40064	House	Not eligible		No effect		
40065	Former gas station	Not eligible		No effect		
40066	House	Eligible	A	No effect	Avoided	
40067	House	Not eligible		No effect		
40068	Commercial building	Not eligible		No effect		
40069	Commercial building	Not eligible		No effect		
40070	Commercial building	Eligible	A & C	No effect	Avoided	
40071	Lateral No.1 of Barr Main Canal	Eligible	A	No adverse effect	Culvert extended and head walls	
40072	Unnamed lateral of Barr Main Canal	Eligible	A	No adverse effect	Drainage pipe buried underneath lateral; repair in kind	
40073	Segments of San Jose Lateral	Eligible	A	No adverse effect	Segments 1 and 2 culvert extensions and head walls, Segments 3 and 4 avoided	

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New Mexico Ecological Services Field Office
2105 Osuna Road Ne
Albuquerque, NM 87113-1001
Phone: (505) 346-2525 Fax: (505) 346-2542
http://www.fws.gov/southwest/es/NewMexico/
http://www.fws.gov/southwest/es/ES_Lists_Main2.html

In Reply Refer To: May 03, 2017
Consultation Code: 02ENNM00-2017-SLI-0535
Event Code: 02ENNM00-2017-E-01036
Project Name: Sunport Biological Evaluation

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

Thank you for your recent request for information on federally listed species and important wildlife habitats that may occur in your project area. The U.S. Fish and Wildlife Service (Service) has responsibility for certain species of New Mexico wildlife under the Endangered Species Act (ESA) of 1973 as amended (16 USC 1531 et seq.), the Migratory Bird Treaty Act (MBTA) as amended (16 USC 701-715), and the Bald and Golden Eagle Protection Act (BGEPA) as amended (16 USC 668-668c). We are providing the following guidance to assist you in determining which federally imperiled species may or may not occur within your project area and to recommend some conservation measures that can be included in your project design.

FEDERALLY-LISTED SPECIES AND DESIGNATED CRITICAL HABITAT

Attached is a list of endangered, threatened, and proposed species that may occur in your project area. Your project area may not necessarily include all or any of these species. Under the ESA, it is the responsibility of the Federal action agency or its designated representative to determine if a proposed action "may affect" endangered, threatened, or proposed species, or designated critical habitat, and if so, to consult with the Service further. Similarly, it is the responsibility of the Federal action agency or project proponent, not the Service, to make "no effect" determinations. If you determine that your proposed action will have "no effect" on threatened or endangered species or their respective critical habitat, you do not need to seek concurrence with the Service. Nevertheless, it is a violation of Federal law to harm or harass any federally-listed threatened or endangered fish or wildlife species without the appropriate permit.

If you determine that your proposed action may affect federally-listed species, consultation with the Service will be necessary. Through the consultation process, we will analyze information contained in a biological assessment that you provide. If your proposed action is associated with

Federal funding or permitting, consultation will occur with the Federal agency under section 7(a)(2) of the ESA. Otherwise, an incidental take permit pursuant to section 10(a)(1)(B) of the ESA (also known as a habitat conservation plan) is necessary to harm or harass federally listed threatened or endangered fish or wildlife species. In either case, there is no mechanism for authorizing incidental take "after-the-fact." For more information regarding formal consultation and HCPs, please see the Service's Consultation Handbook and Habitat Conservation Plans at www.fws.gov/endangered/esa-library/index.html#consultations.

The scope of federally listed species compliance not only includes direct effects, but also any interrelated or interdependent project activities (e.g., equipment staging areas, offsite borrow material areas, or utility relocations) and any indirect or cumulative effects that may occur in the action area. The action area includes all areas to be affected, not merely the immediate area involved in the action. Large projects may have effects outside the immediate area to species not listed here that should be addressed. If your action area has suitable habitat for any of the attached species, we recommend that species-specific surveys be conducted during the flowering season for plants and at the appropriate time for wildlife to evaluate any possible project-related impacts.

Candidate Species and Other Sensitive Species

A list of candidate and other sensitive species in your area is also attached. Candidate species and other sensitive species are species that have no legal protection under the ESA, although we recommend that candidate and other sensitive species be included in your surveys and considered for planning purposes. The Service monitors the status of these species. If significant declines occur, these species could potentially be listed. Therefore, actions that may contribute to their decline should be avoided.

Lists of sensitive species including State-listed endangered and threatened species are compiled by New Mexico state agencies. These lists, along with species information, can be found at the following websites:

Biota Information System of New Mexico (BISON-M): www.bison-m.org

New Mexico State Forestry. The New Mexico Endangered Plant Program: www.emnrd.state.nm.us/SFD/ForestMgt/Endangered.html

New Mexico Rare Plant Technical Council, New Mexico Rare Plants: nmrareplants.unm.edu

Natural Heritage New Mexico, online species database: nhnm.unm.edu

WETLANDS AND FLOODPLAINS

Under Executive Orders 11988 and 11990, Federal agencies are required to minimize the destruction, loss, or degradation of wetlands and floodplains, and preserve and enhance their natural and beneficial values. These habitats should be conserved through avoidance, or mitigated to ensure that there would be no net loss of wetlands function and value.

We encourage you to use the National Wetland Inventory (NWI) maps in conjunction with ground-truthing to identify wetlands occurring in your project area. The Service's NWI program website, www.fws.gov/wetlands/Data/Mapper.html integrates digital map data with other resource information. We also recommend you contact the U.S. Army Corps of Engineers for permitting requirements under section 404 of the Clean Water Act if your proposed action could impact floodplains or wetlands.

MIGRATORY BIRDS

The MBTA prohibits the taking of migratory birds, nests, and eggs, except as permitted by the Service's Migratory Bird Office. To minimize the likelihood of adverse impacts to migratory birds, we recommend construction activities occur outside the general bird nesting season from March through August, or that areas proposed for construction during the nesting season be surveyed, and when occupied, avoided until the young have fledged.

We recommend review of Birds of Conservation Concern at website www.fws.gov/migratorybirds/CurrentBirdIssues/Management/BCC.html to fully evaluate the effects to the birds at your site. This list identifies birds that are potentially threatened by disturbance and construction.

BALD AND GOLDEN EAGLES

The bald eagle (Haliaeetus leucocephalus) was delisted under the ESA on August 9, 2007. Both the bald eagle and golden eagle (Aquila chrysaetos) are still protected under the MBTA and BGEPA. The BGEPA affords both eagles protection in addition to that provided by the MBTA, in particular, by making it unlawful to "disturb" eagles. Under the BGEPA, the Service may issue limited permits to incidentally "take" eagles (e.g., injury, interfering with normal breeding, feeding, or sheltering behavior nest abandonment). For information on bald and golden eagle management guidelines, we recommend you review information provided at www.fws.gov/midwest/eagle/guidelines/bgepa.html.

On our web site www.fws.gov/southwest/es/NewMexico/SBC_intro.cfm, we have included conservation measures that can minimize impacts to federally listed and other sensitive species. These include measures for communication towers, power line safety for raptors, road and highway improvements, spring developments and livestock watering facilities, wastewater facilities, and trenching operations.

We also suggest you contact the New Mexico Department of Game and Fish, and the New Mexico Energy, Minerals, and Natural Resources Department, Forestry Division for information regarding State fish, wildlife, and plants.

Thank you for your concern for endangered and threatened species and New Mexico's wildlife habitats. We appreciate your efforts to identify and avoid impacts to listed and sensitive species in your project area. For further consultation on your proposed activity, please call 505-346-2525 or email nmesfo@fws.gov and reference your Service Consultation Tracking Number.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

New Mexico Ecological Services Field Office
2105 Osuna Road Ne
Albuquerque, NM 87113-1001
(505) 346-2525

Project Summary

Consultation Code: 02ENNM00-2017-SLI-0535

Event Code: 02ENNM00-2017-E-01036

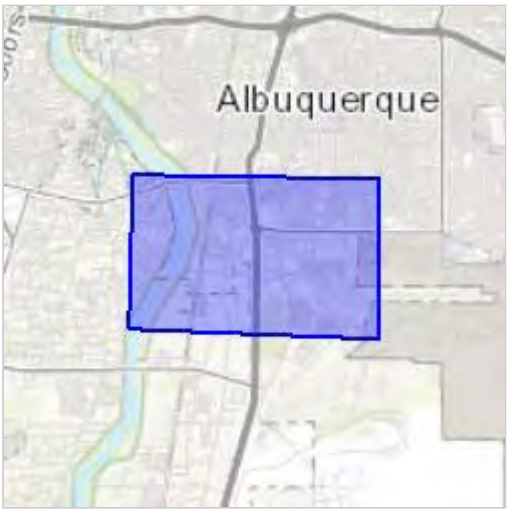
Project Name: Sunport Biological Evaluation

Project Type: BRIDGE CONSTRUCTION / MAINTENANCE

Project Description: Extension of Sunport Boulevard to Woodward Road and road improvements along Woodward Road and Second Street.

Project Location:

Approximate location of the project can be viewed in Google Maps:
https://www.google.com/maps/place/35.05293828589582N106.6382079367956W



Counties: Bernalillo, NM

Endangered Species Act Species

There is a total of 5 threatened, endangered, or candidate species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area. Please contact the designated FWS office if you have questions.

Mammals

NAME	STATUS
New Mexico Meadow Jumping Mouse *(Zapus hudsonius luteus)* There is a **final** critical habitat designated for this species. Your location is outside the designated critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7965	Endangered

Birds

NAME	STATUS
Mexican Spotted Owl *(Strix occidentalis lucida)* There is a **final** critical habitat designated for this species. Your location is outside the designated critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8196	Threatened
Southwestern Willow Flycatcher *(Empidonax traillii extimus)* There is a **final** critical habitat designated for this species. Your location is outside the designated critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6749	Endangered
Yellow-billed Cuckoo *(Coccyzus americanus)* Population: Western U.S. DPS There is a **proposed** critical habitat for this species. Your location overlaps the proposed critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

Fishes

NAME	STATUS
Rio Grande Silvery Minnow *(Hybognathus amarus)* Population: Wherever found, except where listed as an experimental population There is a **final** critical habitat designated for this species. Your location overlaps the designated critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1391	Endangered

Critical habitats

There are 2 critical habitats wholly or partially within your project area.

NAME	STATUS
Rio Grande Silvery Minnow *(Hybognathus amarus)*	Final designated
Yellow-billed Cuckoo *(Coccyzus americanus)*	Proposed

John Taschek

From: Garcia, Hector <hgarcia@usbr.gov>
Sent: Monday, April 30, 2018 11:14 AM
To: John Taschek
Subject: EA = NMDOT CN A300160 and A300161

Received an EA announcement for the improvements from I-25 to 2nd street through Woodward.

The Bureau of Reclamation has no jurisdiction over any part of the proposed work area.

We have no comments at this time.

Hector Garcia
Senior Environmental Protection Specialist

GOVERNOR
Susana Martinez

DIRECTOR AND SECRETARY
TO THE COMMISSION
Alexandra Sandoval

DEPUTY DIRECTOR
Donald L. Jaramillo

STATE OF NEW MEXICO
DEPARTMENT OF GAME & FISH

One Wildlife Way, Santa Fe, NM 87507

Post Office Box 25112, Santa Fe, NM 87504

Tel: (505) 476-8000 | Fax: (505) 476-8123

For information call: (888) 248-6866

www.wildlife.state.nm.us

STATE GAME COMMISSION

PAUL M. KIENZLE III
Chairman
Albuquerque

BILL MONTOYA
Vice-Chairman
Alto

CRAIG PETERSON
Farmington

RALPH RAMOS
Las Cruces

BOB RICKLEFS
Cimarron

ELIZABETH A. RYAN
Roswell

THOMAS "DICK" SALOPEK
Las Cruces

4 May 2018

Mr. John Taschek
Ecosphere Environmental Services
1660 Old Pecos Trail
Santa Fe, NM 87505

RE: Sunport Boulevard Extension; NMDGF No. 18415

Dear Mr. Taschek:

In response to your letter dated 20 April 2018 regarding the above referenced project, the Department of Game and Fish (Department) does not anticipate significant impacts to wildlife or sensitive habitats, with implementation of the applicable mitigation or avoidance measures included within the project description.

1. For Biota Information System of New Mexico (BISON-M) species accounts, searches, and county lists go to bison-m.org.
2. For the Department's Habitat Handbook Project guidelines go to http://www.wildlife.state.nm.us/conservation/habitat-information/habitat-handbook/.
3. For custom, site-specific database searches on plants and wildlife go to nhnm.unm.edu.
4. For state-listed plants go to nmrareplants.unm.edu/index.html.
5. For the most current listing of federally listed species **always** check the U.S. Fish and Wildlife Service's Information, Planning, and Conservation website at http://ecos.fws.gov/ipac/.

Thank you for the opportunity to review and comment on the proposed project. If you have any questions, please contact Mark Watson, Terrestrial Habitat Specialist at (505) 476-8115, or mark.watson@state.nm.us .

Sincerely,

Chuck L. Hayes, Assistant Chief
Ecological and Environmental Planning Division

cc: USFWS NMES Field Office

State of New Mexico
ENVIRONMENT DEPARTMENT

Office of the Secretary

Harold Runnels Building
1190 Saint Francis Drive, PO Box 5469
Santa Fe, NM 87502-5469
Telephone (505) 827-2855 Fax (505) 827-2836
www.env.nm.gov

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

May 22, 2018

John Taschek
Ecosphere Environmental Services, Inc.
1660 Old Santa Fe Trail, Suite H
Santa Fe, NM 87505
By email to: jtaschek@ecosphere-services.com

Dear Mr. Taschek,

The New Mexico Environment Department (NMED) has reviewed the scoping letter for the proposed Sunport Boulevard Extension project and offers the following comments:

NMED Drinking Water Bureau Comments

Please notify Albuquerque Water System, NM3510701, prior to construction on Woodward Rd SE. San Jose Well #4 within the Albuquerque Water System is an inactive well located on Woodward Rd SE between Broadway Blvd SE and Arno St. Consideration should be given to an alignment of the Sunport Blvd extension that avoids the radius of influence for San Jose Well #4 or is at least outside of a 1,000 foot radius of the well head.

NMED Ground Water Quality Bureau Comments

The project is not expected to have any adverse impacts on ground water quality in the area of the potential effect. However, implementation of the project may involve the use of heavy equipment thereby leading to a possibility of contaminant releases (e.g., fuel, hydraulic fluid, etc.) associated with equipment malfunctions. The GWQB advises all parties involved in the project to be aware of notification requirements for accidental discharges contained in 20.6.2.1203 NMAC. Compliance with the notification and response requirements will further ensure the protection of ground water quality in the vicinity of the project.

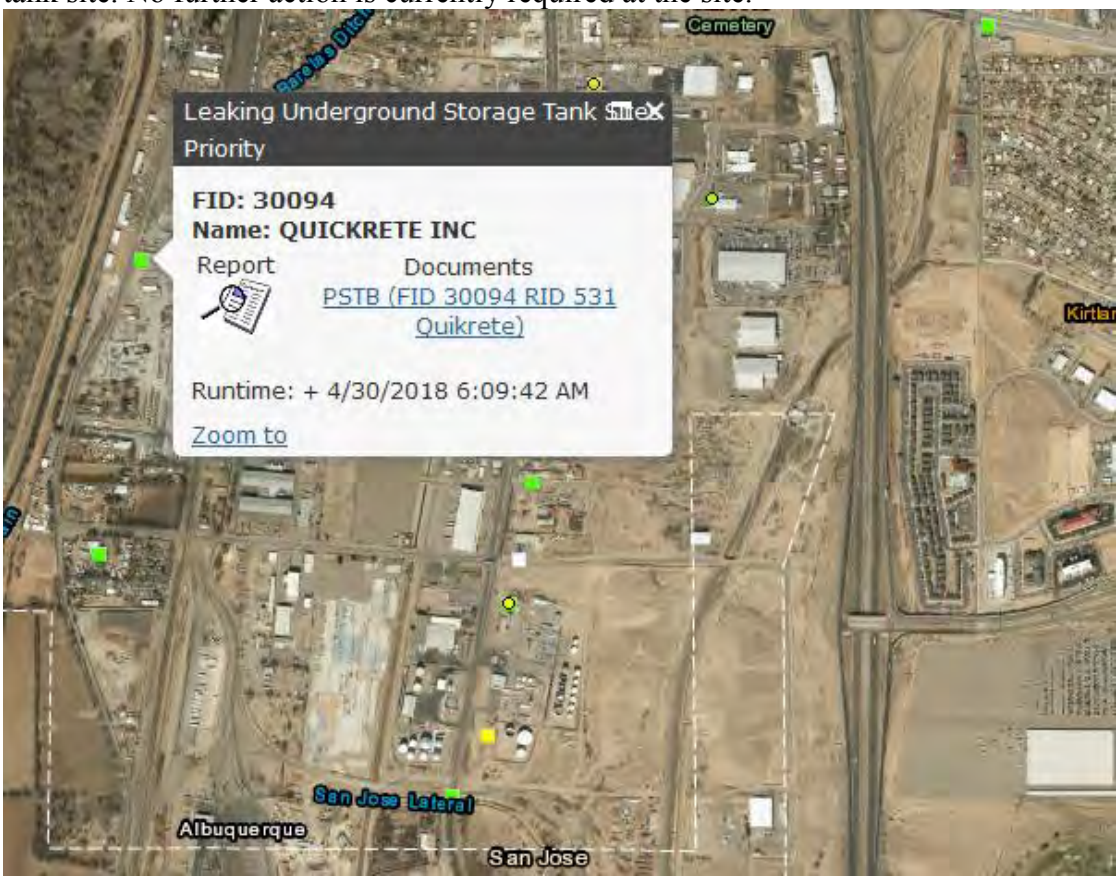
A copy of the Ground and Surface Water Protection Regulations, 20.6.2 NMAC, is available at http://164.64.110.239/nmac/parts/title20/20.006.0002.pdf .

NMED Petroleum Storage Tank Bureau Comments

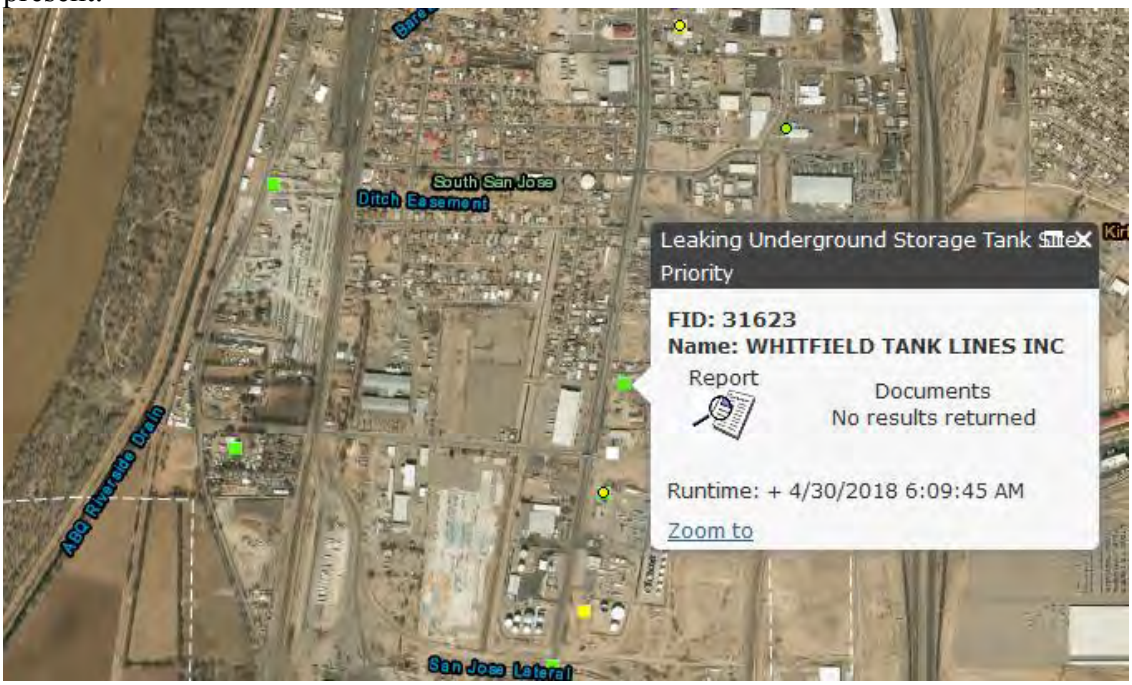
PSTB staff identified several facilities and release sites that may be located in or near the project area and may be affected by or affect the project. They are listed below with their map locations. GoNM map of facilities and listed confirmed releases (not all releases are plotted on map)

Barelas Railroad
East San Jose Elementary
San Jose Cemetery
Barelas Ditch
South San Jose Ditch Easement
Kirtland
ABQ Riverside Drain
San Jose Lateral
Albuquerque
San Jose
Championship Golf Course at UNM

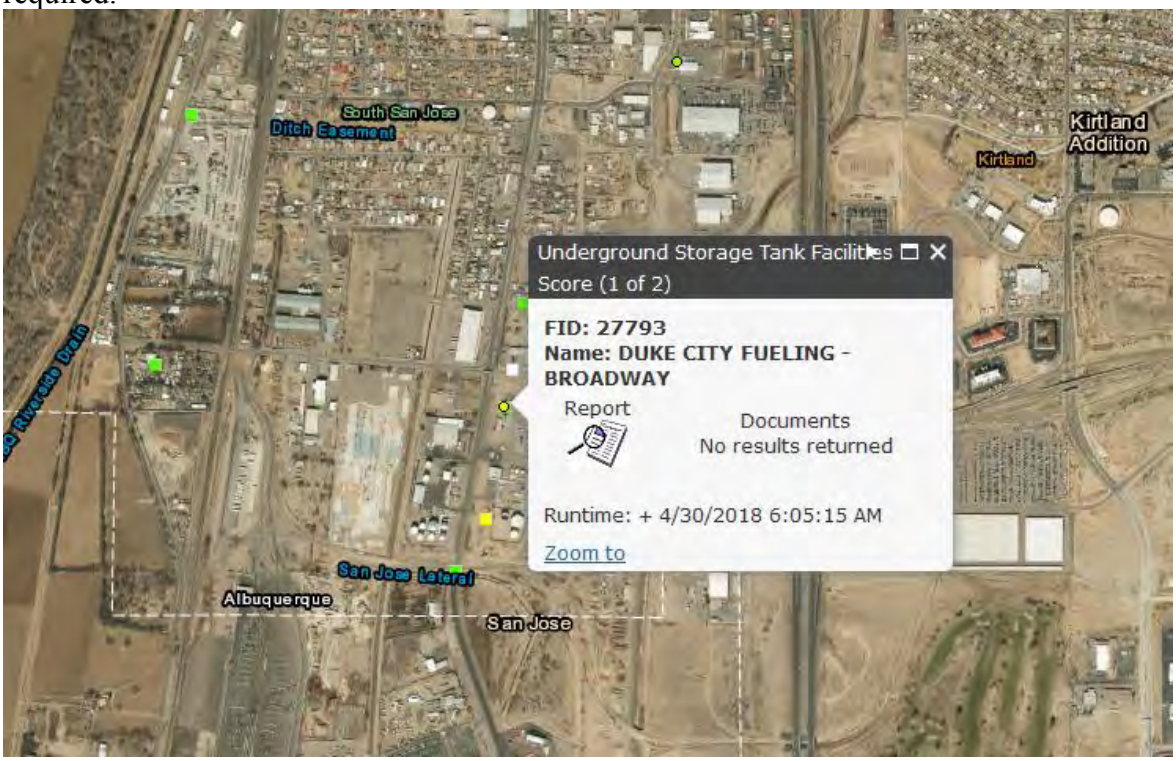
Quickrete, Inc, Facility ID 30094, 2700 Second SW, Albuquerque, had two underground storage tanks that have been removed, according to our records. This was a leaking underground storage tank site. No further action is currently required at the site.



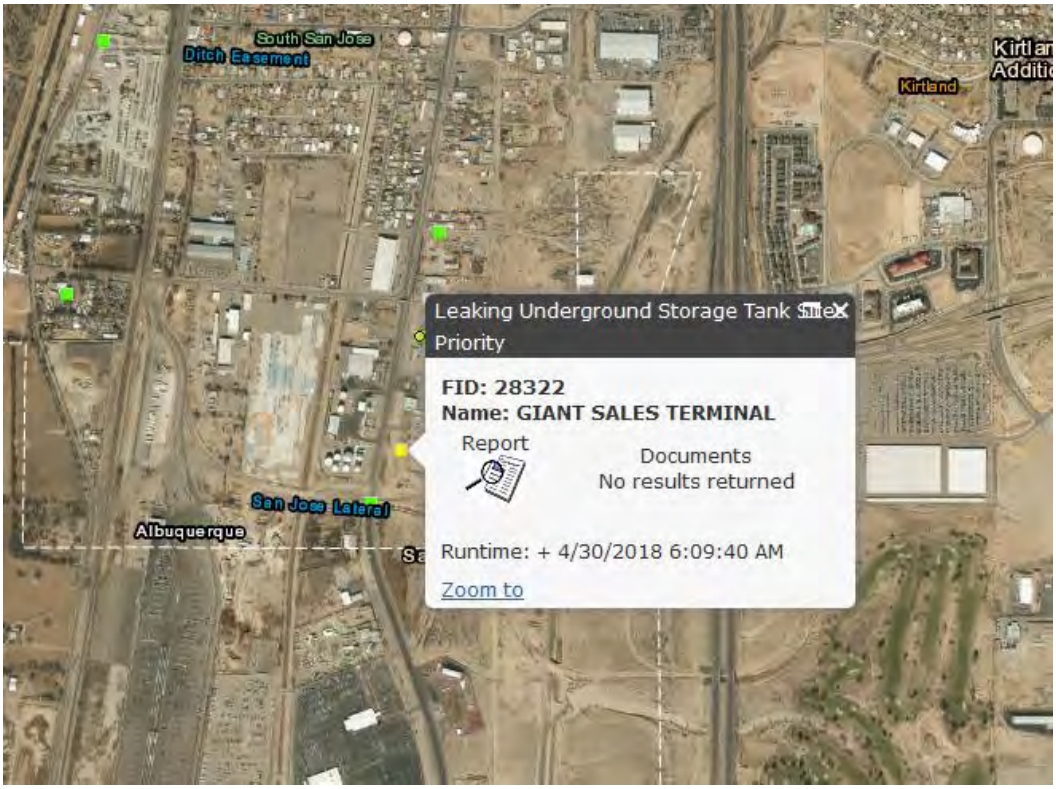
Whitfield Tank Lines, Inc, Facility ID 31623, 3000 Broadway SE, Albuquerque, was also a LUST site. No further action is currently required there. There's no information on the tanks at this facility in the database, which usually indicates there are no tanks regulated by PSTB present.



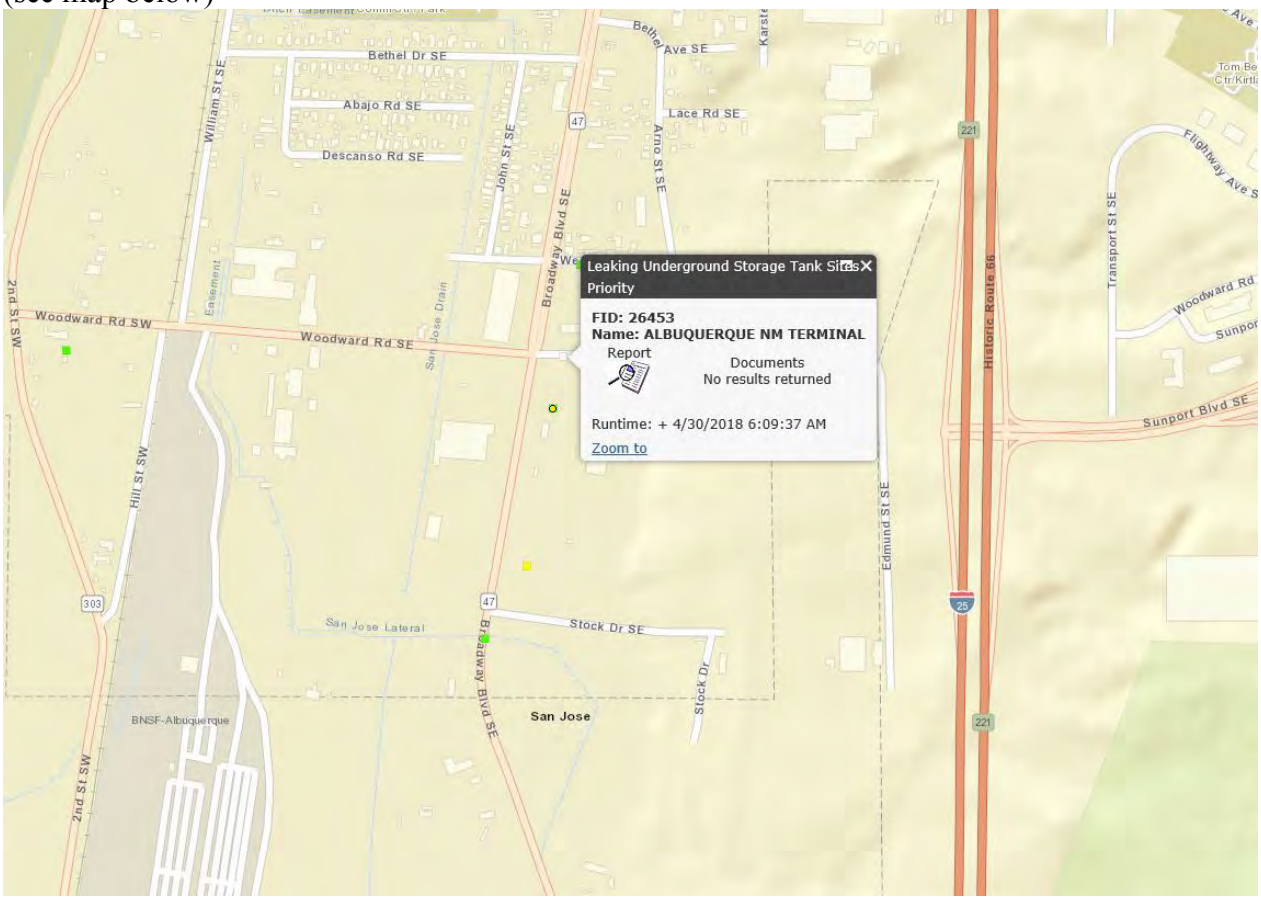
Duke City Fueling, FID 27793, 3203 Broadway SE, has four underground storage tanks currently in use. This was also a LUST site; no further action on the LUST site is currently required.



Giant Sales Terminal, FID 28322, 3209 Broadway SE, had 3 underground storage tanks, all of which have been removed, according to our records. There were two releases here; one, RID 532, has no further action required, and one, #1242, was referred to the Ground Water Quality Bureau.



Albuquerque NM Terminal, FID 26453, 3200 S Broadway, had one underground storage tank, which has been removed, according to PSTB records. This site also had two releases: one, RID 858, has no further action required, and one, RID 1054, that's been referred to the Ground Water Quality Bureau.
(see map below)



If you'd like to search our online records yourself, here are the directions:
Many of the records requested from the Petroleum Storage Tank Bureau are available online, and you can access them quickly yourself by following the directions below. If you'd like a further response from this bureau, please reply with the information you find (say no information if none; say whether you found info on leaks or not; and if possible, say whether there are tanks and whether they are underground or aboveground). In addition, please use any FID's (facility identification numbers) or RID's (release identification numbers) you've found in these searches for the facilities or releases you are seeking information on, and please state specifically which records you're looking for. If you want to see all records for a facility, you're welcome to arrange a time with us to come look at the files. If you need any help using the online resources, please let me know.

Please review the lists on the webpage, https://www.env.nm.gov/ust/lists.html. Click on the Active Leaking and NFA Sites link. The first document lists NFA sites (sites for which no further action is currently required) by county and city. The third document lists active sites alphabetically by priority (the second and fourth documents are pdfs). Click on the document you need, then click Download for the option you choose in the window that opens. You can search the Active Leaking or NFA Sites spreadsheets (or any other spreadsheet) by holding down the ctrl key on your keyboard and then hitting the F key, or by going to Find & Select (all the way to the right) on the Home tab of the spreadsheet, selecting Find, and entering an address or part of an address, a name, or any information you'd like to search on and then clicking on Find Next repeatedly to find all records that fit your search. You can download the No Further Action letter for many of these records by clicking the link in the last column of the NFA spreadsheet. If the No Further Action letter is not online and you need it or any other information, let us know.

If you are looking for information about the presence of underground or aboveground storage tanks at an address, please download the All Storage Tank list, also at https://www.env.nm.gov/ust/lists.html. This lists all storage tanks in the state that fall or fell under our regulations and have been registered with us, whether they are still present or not. This spreadsheet can be searched the same way as the above ones. If you only need to know about tanks that are currently in use or temporarily out of use, download the Active Storage Tank list.

The GoNM map link also enables you to locate quite a bit of information that will facilitate your search, including NFA letters. Not all information about each site has been uploaded there, but ***recently many site documents have been added***. Instructions for Go NM: Go to https://www.env.nm.gov/ust/lists.html. Click on the GoNM link at the bottom left of the page. Documents may download more easily if you use Internet Explorer. When you are in the GoNM Mapper, you can use the zoom slider at the upper left of the map to zoom in. Colored and white shapes represent facilities that have or had tanks and/or have been involved in a release. To find out more about a facility, click on the white i inside the blue circle at top of the screen and then click on the shape that represents that facility. When the dialog box pops up, you can click on either the Report or any link under Documents If it is a leaking site, there will usually be a link under Documents. Many No Further Action letters and other documents are accessible and downloadable this way. If you click on the icon under Report at the left of the dialogue box, there is also quite a bit of information there. If there is a triangle (like a "play" symbol on a media player) at the top right of the dialog box, click on it, and a second page of information will open.

NMED Solid Waste Bureau Comments

The NMED's Solid Waste Bureau (SWB) advises that such work sometimes results in the knowing or inadvertent generation of regulated asbestos waste, as the necessary trenching or excavation has the potential to impact asbestos-containing materials, such as asbestos-cement pipes (sewer, water or conduit). Suspect pipes, fragments or soils contaminated with related fragments or fines need to be sampled and analyzed by Polarized Light Microscopy to determine if the materials contain greater than one percent (1%) asbestos. If so, the pipes, fragments and/or contaminated soils require management as regulated asbestos waste per the New Mexico Solid Waste Rules (SWR), 20.9.2 – 20.9.10 NMAC, to include proper containerization, labeling, manifesting, transport by an approved commercial hauler and disposal at a permitted solid waste facility specifically permitted to accept regulated asbestos waste. Additionally, trenching and excavation also has the potential to identify areas of buried solid waste. If more than 120 cubic yards of solid waste from any one contiguous area requires excavation, the SWB may require submission of a Waste Excavation Plan pursuant to the SWR, 20.9.2.10.A(15) NMAC.

NMED Surface Water Quality Bureau Comments

USEPA Section 402 NPDES Stormwater Program, Construction General Permit
The U.S. Environmental Protection Agency (USEPA) administers the National Pollutant Discharge Elimination System (NPDES) program under Section 401 of the Federal Clean Water Act in the State of New Mexico. Coverage under the NPDES Construction General Permit (CGP) is required for storm water discharges from construction projects that will result in the disturbance of one or more acres (including common plans of development).

Among other things, the CGP requires that a Stormwater Pollution Prevention Plan (SWPPP) be prepared for the site and that appropriate Best Management Practices (BMPs) be installed and maintained both during and after construction to prevent, to the extent practicable, pollutants (primarily sediment, oil & grease, and construction materials from construction sites) in storm water runoff from entering waters of the U.S. This permit also requires that permanent stabilization measures (revegetation, paving, etc.), and permanent storm water management measures (storm water detention/retention structures, velocity dissipation devices, etc.) be implemented post construction to minimize, in the long term, pollutants in storm water runoff from entering these waters. In addition, permittees must ensure that there is no

increase in sediment yield and flow velocity from the construction site (both during and after construction) compared to pre-construction, undisturbed conditions.

USEPA requires that all "operators" (see Appendix A of the permit) obtain NPDES permit coverage for construction projects. Generally, this means that at least two parties will require permit coverage. The owner/developer of this construction project who has operational control over project specifications, and the general contractor who has day-to-day operational control of those activities at the site, which are necessary to ensure compliance with the storm water pollution plan and other permit conditions, and possibly other "operators" will require NPDES permit coverage for this project.

Operators of certain small construction activity (disturbance of one to five acres) may be waived from permit requirements under limited circumstances. To be eligible for this waiver, operators must certify to USEPA that they are eligible (see Appendix C of the CGP). Waivers are only available to stormwater discharges associated with small construction activities (i.e., 1-5 acres).

More information on USEPA's NPDES Stormwater Program is available at on-line at https://www.epa.gov/npdes/npdes-stormwater-program. The CGP was re-issued January 11, 2017 effective February 16, 2017 which includes additional state requirements in Part 9 of the permit. A link to the 2017 CGP and USEPA's reporting tool (NeT-CGP) for operators to apply for coverage or waivers is available at: https://www.epa.gov/npdes/2017-construction-general-permit-cgp.

USACE Section 404 Dredge and Fill Permits and NMED 401 Certifications
The U.S. Army Corps of Engineers (USACE) issues or authorizes Standard Individual Permits (IPs), Nationwide Permits (NWPs), and the Emergency Regional General Permit (RGP) under Section 404 of the Federal Clean Water Act.

The U.S. Army Corps of Engineers (USACE) issues or authorizes Standard Individual Permits (IPs), Nationwide Permits (NWPs), and the Emergency Regional General Permit (RGP) under Section 404 of the Federal Clean Water Act. Activities that result in the discharge of dredged or fill material to waters of the U.S., such as earth-moving work within wetlands, lakes, and streams (including ephemeral streams or arroyos), may require a permit. If you have questions about activities within watercourses or wetlands that may require coverage under a Clean Water Act Section 404 permit, then more information is available on-line from the USACE, Albuquerque District, Regulatory Division at http://www.spa.usace.army.mil/Missions/Regulatory-Program-and-Permits/.

A water quality certification is required under Section 401 of the Federal Clean Water Act for activities regulated under Section 404. More information on the permitting and certification requirements is available on-line from NMED at https://www.env.nm.gov/surface-water-quality/dredgeandfillactivities/.

Thank you for providing NMED with the opportunity to review and comment on this proposed project.

Sincerely,

Michaelene Kyrala
Director of Policy
New Mexico Environment Department
Office: 505.827.2892
E-mail: michaelene.kyrala@state.nm.us

Appendix C – Public Hearing PowerPoint Presentation

PUBLIC HEARING

Sunport Boulevard Extension & Woodward Road Improvements

Environmental Assessment

U.S. Department of Transportation
Federal Highway Administration

NMDOT

AECOM

Bernalillo County Project No. TS09-06

NMDOT Project Nos.

CN A300160 & CN A300161

July 19, 2018

Facilitator & Translator

- Bill Moye, Star Group LLC
- Spanish translation available

  La interpretación en español estará disponible

Presenters

- Elias Archuleta, PE
  - *Technical Services Director, Bernalillo County*
- Peter Hinckley, PE
  - *Consultant Project Manager, AECOM*
- John Taschek
  - *Environmental Consultant, Ecosphere*

Hearing Agenda

- 6 p.m. Open House
- 6:30 p.m. Welcome and Introductions
  - Opening Remarks
  - Ground Rules
  - Formal Presentation
  - Next Steps
- Formal Comment Period
  - Individual Public Statements (five minutes max)
  - Submit Written Comments
- Conclude Hearing

Opening Remarks

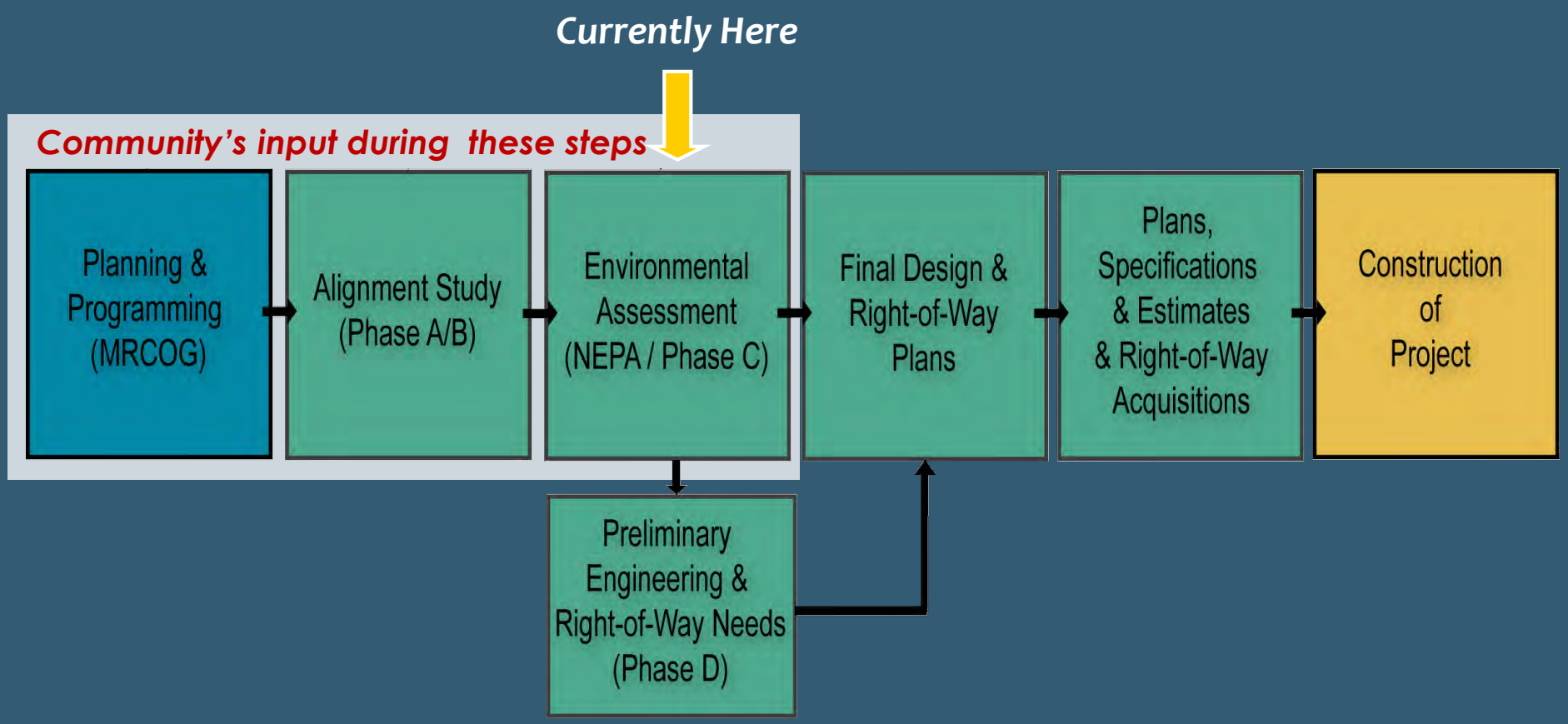
Ground Rules

- This is a formal public hearing process
  - It differs from a public meeting
- Silent/vibrate cell phones
- Respect the speaker and listeners
- Listen to learn
- To make formal comment sign up to speak
  - All comments / statements will be recorded by court reporter

Presentation Agenda

- Environmental Assessment is available for Public Review at:
  - County and City Community Centers
  - Bernalillo County Public Works Division
  - South Broadway Library
- Project Development Process
- Brief History of Past Public Involvement
- Build and No Build Alternatives
- Environmental Assessment Revisions, Updates and Major Findings
- What happens next?

Project Development Process
(NMDOT)



Environmental Process

National Environmental Policy Act (NEPA)

Currently Here

Public scoping of issues and alternatives

- Inform public and agencies of intent to conduct project
- Conduct public and agency meetings
- Collect comments

Prepare Environmental Document

- Analyze comments
- Develop and evaluate alternatives
- Collect data
- Analyze impacts
- Prepare environmental document

PUBLIC REVIEW OF ENVIRONMENTAL DOCUMENT

- INFORM PUBLIC OF EA AVAILABILITY (TYPICALLY 30 DAY COMMENT PERIOD)
- CONDUCT PUBLIC HEARING
- COLLECT COMMENTS

Finalize Environmental Document

- Address comments
- Identify measures to mitigate impacts
- Prepare Input Synopsis
- Recommend action

Finding of No Significant Impact (FONSI)

Final EIS and Record of Decision

AECOM

Public Involvement

- June 2010 — Public Meeting
- October 2011 — Public Hearing
- January 2012 — San Jose & Mountain View Neighborhood Assn Meetings
- February 2012 — Public Meeting
- Various dates — Small Group / Neighborhood Assn Meetings
- August 2013 — San Jose & Mountain View Neighborhood Assn Meetings
- September 2013 — Public Meeting
- April 2015 — South Valley Transportation Public Meeting
- August 2015 — Public Hearing
- July 2018 – Public Hearing

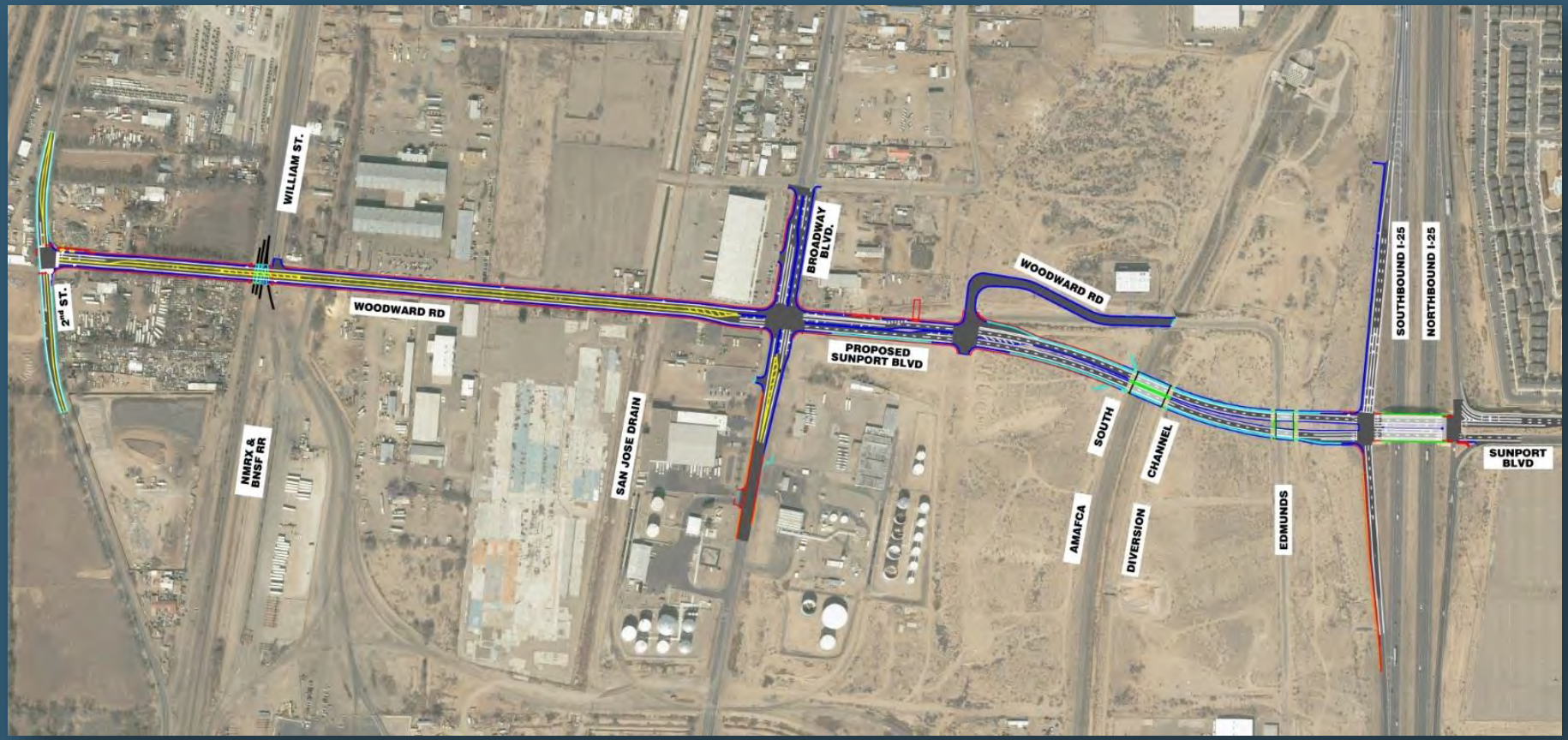
Alternatives

- Alternatives D and H Eliminated
  - Unacceptable geometry—inadequate bridge and rail clearances, extreme skew angles at bridges, circuitous alignments, effectively unsafe
  - Poor connectivity—no connection to Woodward or other public roads
  - Railroad impacts (crossings, relocations, Right of Way needed)
  - Business relocations and more right of way
  - Higher costs

Build Alternative

- Provides connectivity to the west
  - 2nd Street to I-25 connectivity
- Connects to Broadway & Woodward at existing signalized intersection / no new intersection on Broadway
- Spans the South Diversion Channel and Edmund Street with Bridges at approximate 90° angles
- Crosses three mainline RR tracks and freight spur track
- No relocations of businesses

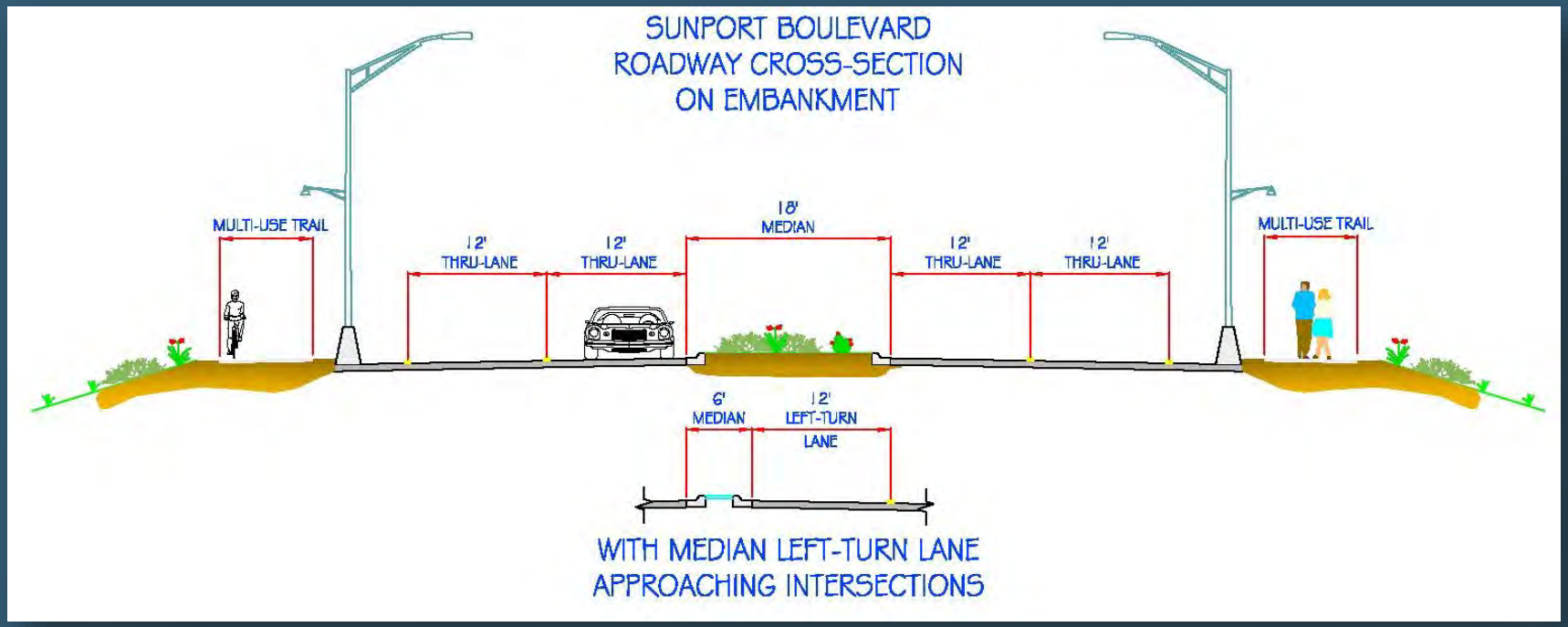
Sunport Boulevard / Woodward Road Alignment



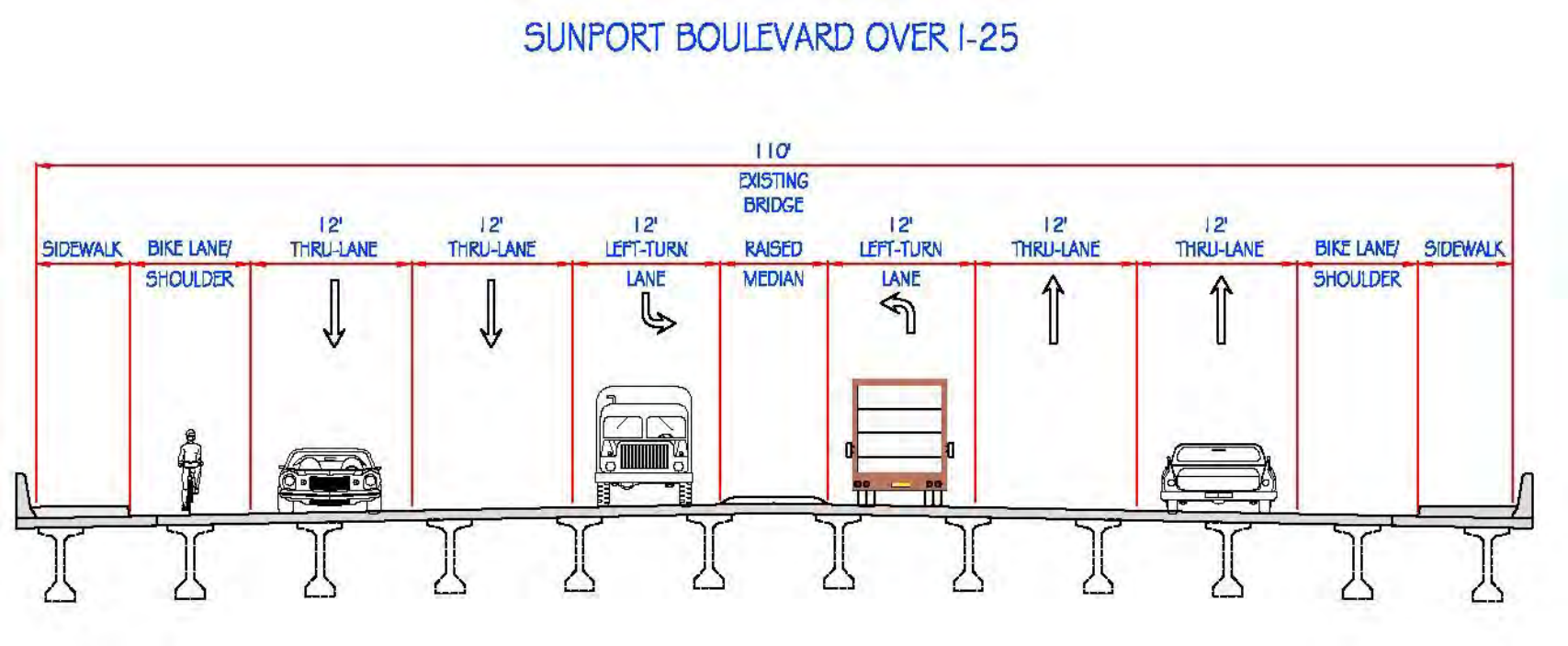
Build Alternative

- Sunport Boulevard designed as a four-lane median-divided urban arterial
- Woodward Road designed as a three-lane urban collector
- Bike lanes & sidewalks between 2nd Street and I-25
- Intersection improvements and traffic signals (2nd Street, Broadway and I-25 Ramps)
- Widening of I-25 southbound ramps
- Requires relocation of PNM transmission lines and other utilities
- 1% for Public Art

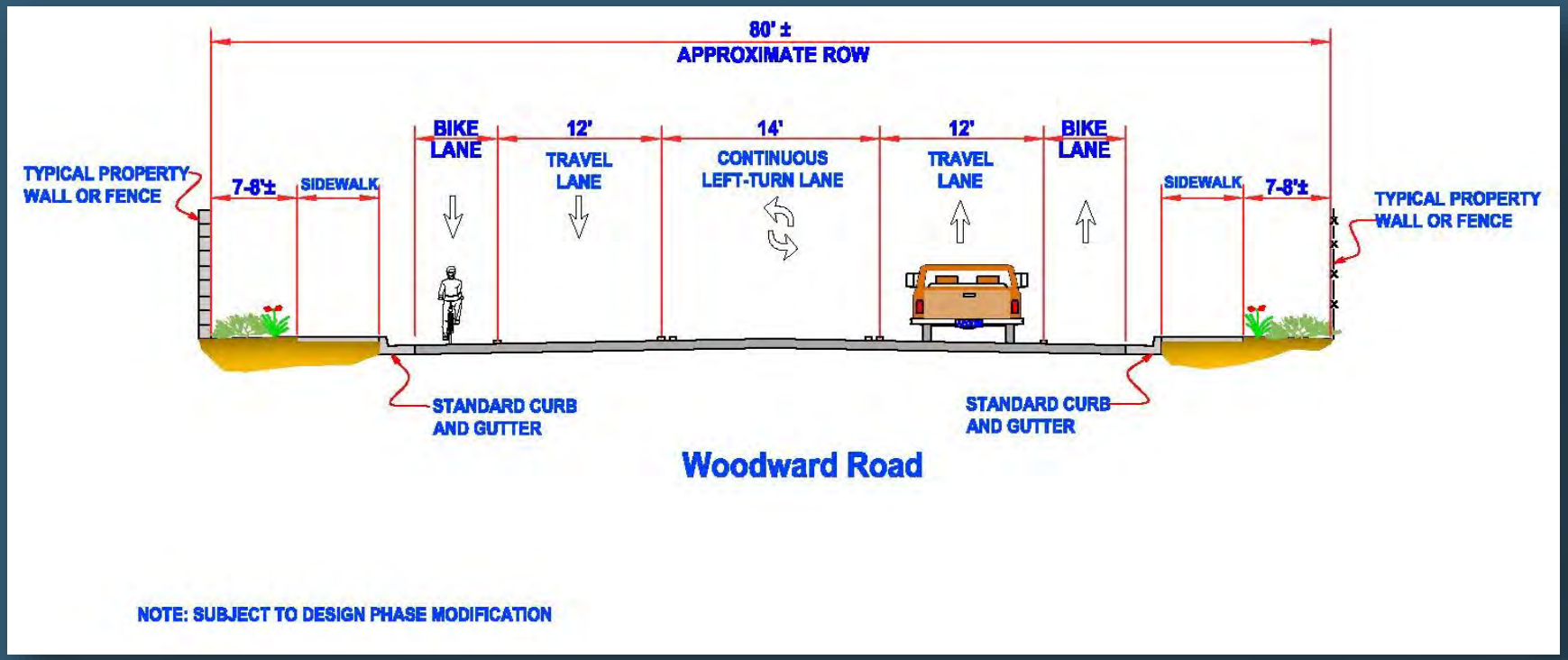
Sunport Boulevard Cross-Sections



Sunport Boulevard Cross-Sections



Woodward Road Cross Section



No Build Alternative

- No new construction or roadway improvements by the County
- Woodward Road is maintained by the City of Albuquerque
- No new connection between Woodward, Broadway and I-25
- No bike lanes or sidewalks improvements
- No improvements at Woodward / 2nd Street intersection
- Future traffic growth must be accommodated on existing roadways, particularly Broadway, Gibson, Rio Bravo, 2nd and Woodward

Environmental Assessment

Revisions, Updates & Findings

- Purpose and Need of the Projects
  - Transportation System Connectivity—i.e., **'close the gap' between Gibson and Rio** Bravo Boulevards
  - Improved access between Sunport Boulevard, I-25, and Broadway Boulevard
  - Congestion relief
  - Improve pedestrian and bicycle facilities
  - Improve emergency vehicle access to area

Environmental Assessment

Revisions, Updates & Findings

- Population & Employment Forecasts
  - Flat growth forecast for the area by UNM
  - Reduced Traffic Volume forecasts vs. previous plans
  - Addition of Sunport Boulevard still reduces traffic on Broadway north and Gibson
    - Broadway north of Sunport—41% less traffic with Sunport compared to No Build
    - Gibson east of Broadway—21% less traffic with Sunport compared to No Build

Environmental Assessment

Revisions, Updates & Findings

- Air Quality Analyzed
  - **Performed "hot spot" analyses three major intersections**
  - Addressed air toxics and greenhouse gases
  - Air quality studies / analyses have met all NEPA / FHWA requirements
  - Project is well within EPA guidelines for transportation related air quality (CO)
  - Addition of Sunport Boulevard & Woodward Road **improvements does not have significant impact on area's** air quality
  - Industrial air quality addressed by local governments via zoning and design controls

AECOM

Environmental Assessment

Revisions, Updates & Findings

- Noise Analyzed
  - Performed onsite noise monitoring in January 2018 at three locations
  - Developed Noise Model—calibrated vs. onsite measurements
  - Noise levels approach or exceed federal criteria at three locations near west end of Woodward (near RRs) and one location near northeast corner Broadway / Wesmeco
  - The above are imperceptible noise increases (<3 dBA); railroad and aircraft noise not considered

Environmental Assessment

Revisions, Updates & Findings

- Land Use
  - Acknowledgement of mixed use nature of area including residential with neighborhood boundaries
  - Conforms with existing plans (i.e. Sunport Station Area Plan, sector plans, etc.)
  - Development controls being added by county to encourage responsible development—Design Overlay District

Environmental Assessment
Revisions, Updates & Findings

- Not building the project has an impact — No potential to alter current land use trends

Environmental Assessment

Revisions, Updates & Findings

- Environmental Justice
  - Environmental Justice populations present in San Jose and Mountain View
  - History of community public health concerns
  - Traffic decreases in San Jose neighborhood north of project, and increases in industrial areas to the south
  - **Industries' effects addressed with overlay land use** controls to encourage responsible development
  - Potential economic benefits, jobs, wages, investment
  - Conclusion: No disproportionate impact on minority or low income populations

AECOM

Environmental Assessment

Revisions, Updates & Findings

- Hazardous Materials / Superfund Site
  - Alignment crosses South Valley superfund site
  - Site clean-up consists of deep groundwater remediation
  - Construction will not impact clean-up
  - Clean-up has been effective; some wells being closed / removed — plume size reduced
  - Other wells and pipelines affected by project will be reconstructed by remediation contractors

Environmental Assessment

Revisions, Updates & Findings

- Indirect Effects – Induced Growth
  - Improved access, successful remediation, past plans
  - Concern about community impacts – traffic, air quality
  - Mitigation through overlay land use controls
  - Potential economic benefits, jobs, wages, investment
- Cumulative Impacts
  - Major transportation projects, Sunport, other plans
  - Areas of no impact (air quality, etc.)
  - Cumulative impacts (noise, multimodal connectivity, urban development patterns)

AECOM

Next Steps

- Collect all public comments by July 31
- Preparation of agency and public input synopsis
- Determination by Federal Highways Administration
- Enter final design and right-of-way acquisition phase
- Develop Design Overlay—Sunport Commerce Center
- Public meetings during final design phase
- Eligible for public art installation
- **Begin construction…**

Ways to Submit Comments for the Record

- Verbal comments/statements tonight
- Via the comment form/submit tonight
- Written using e-mailing/mailing address on the comment form
- E-mail to peter.hinckley@aecom.com, jtaschek@ecosphere-services.com, or rleichwald@bernco.gov
- Comments are due by July 31
- Review the environmental assessment document at www.bernco.gov/Sunport

Public Comment Ground Rules

- All comments / statements will be formally recorded by a court reporter
- Please speak slowly and clearly, identify your name and address for the record
- Speak into the microphone
- Time period for comments is five minutes or less; longer statements can be submitted in writing
  - Bell notification at 30 seconds remaining
- Please respect the speaker

Thank you for attending

Sunport Boulevard Extension / Woodward Road Improvements Environmental Assessment Public Hearing

Appendix D – Hearing Transcript and Comments

SUNPORT BOULEVARD EXTENSION
AND WOODWARD ROAD IMPROVEMENTS
PUBLIC HEARING

Thursday, July 19, 2018, 6:40 p.m.

MOUNTAIN VIEW COMMUNITY CENTER
201 Prosperity Avenue, Southeast
Albuquerque, New Mexico 87105

BEFORE: KIM KAY SHOLLENBARGER, RPR, CCR #236
Paul Baca Professional Court Reporters
500 4th Street, Northwest, Suite 105
Albuquerque, New Mexico 87102

MR. MOYE: Ladies and Gentlemen, thank you very much for your patience. My name is Bill Moye and I'm with the Star Group and I'll be your facilitator tonight.

And you're here for the public hearing meeting for the Sunport Boulevard Extension and the Woodward Expansion or Road Improvements, and it's an environmental assessment, so it's a very formal hearing tonight. And so, if anybody wants to speak, I'll tell you now, you have to sign up back there to be able to come up here and speak. So it's not urgent but, whenever, in about 40 minutes we're going to have you speak.

So we have presenters with us tonight. Elias Archuleta, a professional engineer. He's the Technical Services Director for Bernalillo County. We got Peter Hinckley, he's a professional engineer also and Consultant Project Manager for AECOM. And then John Taschek, Environmental Consultant with Ecosphere.

Our agenda for tonight is basically from 6 to 6 -- whatever it is now -- 40, is an open house where you have an opportunity hopefully to look at the posters in the back that kind of describe the project. 6:30 was supposed to be -- it was a welcome

introduction. So then we want to have opening remarks, ground rules, formal presentation, and then one of the next steps. And that will pretty much conclude anything that looks like a presentation from the County and the contractors.

After that, so we start the formal comment period. Individual public statements are limited to five minutes each, and there will be a system of telling you you've got 30 seconds left and watch out, there's a train coming or something, and you got to get off the stage. And then we'll conclude the hearing when everyone who has signed up to speak has spoken. Fair enough?

So our ground rules for tonight, let me go to ground rules real quick. So ground rules for tonight, this is a formal presentation and public hearing and the process is different than a regular public meeting. There's no Q and A session. Anything that looks like a Q and A session will have -- after we conclude the meeting, and if you can get someone to answer questions for you, that's up to you guys. If you'd please have your cell phones on silent or vibrate. And if you need to take a call or make a call, would you take it outside and not in this room, please.

We also have a ground rule about respect to speaker and the listener. This is critical, because I believe everybody in this room, including the presenters, have something of value to say. Listen to learn, you know, give them your full attention, whoever is speaking.

And then, make your formal comments, sign up to speak. So making those comments. It says this about 25 times, we got to get that done. All comments and statements will be recorded by a court reporter, and she is over here. And the court reporter requires you to say your name clearly and give your address. That's it. That's pretty easy, right?

Okay, so now at this moment I would like to go back to opening remarks and introduce Rodrigo Eichwald with the County.

MR. EICHWALD: Good evening. I'm Rodrigo Eichwald from Bernalillo County, the project engineer. I would like to introduce Commissioner Quezada to say a few opening words, please, Commissioner.

(Applause)

COMMISSIONER QUEZADA: Thank you so much. Good evening. Thank you all for coming to learn more

about this important project. I hope you know that this project has been 30 years in the making, and so I brought a quick summary so you can kind of understand the whole process and how we've come to this point today.

Back in 1984 the project began as a recommendation from the South Valley community to facilitate economic development and to provide better access to the airport. So when they were talking about facilitate economic development they're talking about different types of economic development other than what historically has happened, not only in the South Valley, but in the Mountain View area. So access in order for that to change and to change what kind of corporations and what kind of stuff comes into these neighborhoods, that depends on access. And so they, for many years, as you well know, have been trying to change the access so we can change what types of industries and what kinds of jobs that we're able to provide for this community.

And then an environmental report in 1991 recommended only the eastern part of the project to be completed and the western part to be treated as a separate project. Then around 1995, the eastern portion serving the airport is built. And then in

2008 Bernalillo County agreed to build the western portion of the project. Since then Bernalillo County has been studying, analyzing, meeting with the community and finding the money to build the western part of this project.

Now, in 2018, today, we are presenting to you our findings of the most recent environmental assessment. We hope that you will listen, obtain a deeper understanding of what this project is really all about and what the potential it has for this community and all of Bernalillo County. But most importantly, the idea presented over 30 years ago to facilitate economic development and to provide better access not only to the airport, but different types of development still holds true today.

So thank you all for coming tonight and I hope we all learn and I hope that we're all able to compromise if we can't agree. We need more compromise in this country. So now is a good day to start that. Thank you.

(Applause)

MR. EICHWALD: Hello, I'd like to acknowledge Diane Dolan who is here from Councilor Benton's office.

(Applause)

MR. EICHWALD: With that, we'll get started with the presentation.

MR. MOYE: Okay. I would like to introduce Elias Archuleta again, who is the individual who's going to speak about the first half of this program.

MR. ARCHULETA: Thank you, Bill. Can you hear me? Good evening. Tonight we'd like to start with letting you know where you can review the environmental assessment document. The document is available at County and City community centers, at the Bernalillo County Public Works headquarters down on Broadway. You can also review copies at the South Valley library, and you can obtain electronic copies on our web site, which is www.bernco.gov/sunport.

So tonight our presentation is going to be broken into four areas to cover. We're going to go over the project development process on how we got here, a brief history of the public involvement efforts that we've had to date, and then we'll review the alternatives that were considered for the environmental assessment, as well as the revisions to the EA that have happened over the past two or three years, as well as the major updates and the findings that occurred in the EA that we are publishing now. And then, from that point, we'll cover where we go

from here after tonight's meeting.

So the project development process that we're following today is dictated by the New Mexico Department of Transportation Location Study Procedures Manual. This manual guides the steps that we need to go through to ensure that we meet all the requirements of the National Environmental Policy Act, otherwise known as NEPA.

So this process starts with the government's involved -- determining the scope and need for the project and this occurs at the programming level with the hearing in the Albuquerque metro area, occurs at the Metropolitan Planning Organization. And at that point they'll identify the funding that's going to be involved, as well as the work that we're going to evaluate.

From that point, once we have the funding identified, we'll go into the alignment study process which will evaluate all feasible alternatives for what we're looking for as well as compared against the no build, which is us doing nothing. From that point we move into the environmental assessment state and preliminary design, which is the phase we're in now. Once we receive an environmental clearance we can move on to final design, right-of-way acquisition

and finally construction.

So to go into a little more detail about the environmental process that we're in right now. The process began back about ten or so years ago on this project when we went to public scoping and at that point we took the ideas that came out of the programming and went to the public to inform not only the residents, but also any stakeholders, businesses in the area, as well as other agencies that are impacted by our construction. And then we took -- we explained what we were looking to do, the purpose of the project, what we want to get out, and we solicited comments about where we think we should go. And from there we took those comments, applied it to the alternatives that we developed and compared that to the conditions that exist today and in the future to see how our improvements would help and that helped to guide and select the preferred alternative to move forward.

So all of that was prepared and put into an environmental document and we publish it and that's what we're doing today with the public hearing, to get your formal comments. Once we're done here tonight and once the comment period ends, and our comment period will go through July 31st, we'll

compile all the comments from tonight, determine if there's any other mitigation or evaluation that needs to occur, prepare our final document and submit it to Federal Highways for them to give us a final determination.

If that final determination comes back that there's no significant impact, we can proceed to design. If we do not receive a finding of no significant impact, Federal Highways can recommend us going to an environmental assessment and at that point the County will determine where we go from there.

So to date, like I said, the project actually began in June of 2010, was the first public meeting that we had and since that date we've conducted six public meetings and another four neighborhood meetings, which includes tonight's public hearing.

The meetings in 2015 resulted in revisions to the environmental document at that time, which required us to combine the Woodward portions into our project and that's what's taken the two years that you've seen since 2015. Actually, three years until tonight for us to incorporate those changes and resubmit our environmental assessment.

So from here I'm going to turn it over to Pete Hinckley who's our engineering consultant and will discuss our alternatives.

MR. HINCKLEY: Good evening. So I'm going to start out with a description of alternatives. We actually looked at a number of alternatives over the course of the past few years of studies. As Elias said, we actually began the project some time ago and have gone through alignment analysis, alignment study, and set up a few different alternatives.

We have ruled out the other alternatives and carried forward what we call a build alternative. The previous alternatives that we ruled out were other alignments south of the Woodward Road location. Those alternatives effectively did not work as well. They were not acceptable. They did not have adequate roadway geometry. They were circuitous. They had poor clearances over the railroads and over the AMAFCA channel. They didn't work as well from the overview perspective. They didn't connect as well and provide connectivity to the west. So we eliminated those alternatives and really don't discuss those anymore, nor do we analyze those in the environmental document because they don't meet the purpose and need and really were infeasible.

I will describe now the build alternative that we have proposed here tonight and what we have illustrated on the boards in the back and some images on these slides.

The build alternative basically does provide connectivity to the west between Second Street, Broadway and I-25. We connect those three locations. We provide a signalized intersection actually at each end of the project. We span over the South Diversion Channel. We span over the Edmund Street location. We don't relocate any businesses. We feel like this alternative was clearly the best alternative to move forward with.

I have a pointer here. I'm just going to kind of describe the project from the west end to the east. We start over here at Second Street and we improve Second Street for channelization of the intersection. We intend to signalize the intersection at Second Street and we'll channelize it and that requires a few hundred feet of construction on Second Street as well. Then we proceed over the railroad. We actually do cross over the railroad stream main line tracks. Those tracks will remain. We'll continue with an at-grade intersection over the railroad. The intersection will be improved in order

to provide gates and a safe crossing at this location.

We then cross over Williams Street, the San Jose Drain and intersect with Broadway. From Broadway east then we connect in with Sunport Boulevard Extension Project, the original project. On Broadway south we have to widen Broadway to accommodate channelization and improvement to the intersection. The intersection is currently signalized and will continue to be signalized, but signals will have to be relocated for the wider intersection we're going to build.

We provide an at-grade intersection on Sunport Boulevard right here at Arno Street location for connection to existing Woodward to remain. In other words, this section of Woodward Road will remain in place and connect to Edmund Street in order to provide access to the properties along those locations and to remediation contractors who are doing the groundwater cleanup in those areas.

We're going to extend and across over the South Diversion Channel. We also cross over Edmund Street and then intersect with I-25. Our project includes widening of the southbound ramps, so both the southbound off ramp and the southbound on ramp

get an additional lane.

So to be a little more specific about the build alternative, it's basically a four lane urban arterial for Sunport Boulevard. A three lane urban collector roadway for Woodward Road. We do see traffic volumes considerably different between Woodward and Sunport. Sunport is predicted to carry something on the order of magnitude of 11,000 vehicles a day in the future for our design year. Whereas, Woodward Road is predicted to carry about 7,000 vehicles per day. So with the 7,000, a three lane section is adequate and a four lane section is planned for Sunport Boulevard for traffic volume.

Both roadways will have bike lanes in both directions and sidewalks in both directions. This is a change from what we described previously when we were here for our public hearing in the past in 2015. At that point in time we had stopped the sidewalks at the Arno Street intersection. We decided to continue them all the way up to I-25. So that's a relatively minor change, but provides great connectivity and access.

We improved the intersections at the edge of the project, Second Street and at I-25. We added signalized signals to those intersections and then we

reconstructed the Broadway intersection as well. And as I already mentioned, widening the southbound lanes.

And we do have to relocate utilities as part of the project. The PNM transmission lines just west of I-25 and that's obviously going to be a big cost and a big part of the project, so we're going to start working with PNM in the design phase.

Another issue with the project, we'll be able to use one percent for public art. The County has a program in place and this applies to funds that the County contributes towards the project, which is about 25 percent of the project costs, and 1 percent is dedicated for aesthetic design and public art. So this project has an opportunity to incorporate those kind of features into the project.

This is a typical section of Sunport Boulevard itself. This illustrates the roadway as if it were on an embankment section or a utility wall section.

Let me back up. Sorry, got carried away. What we have is two lanes each direction separated by an 18-foot median. We have an 18-foot divided median. The median would be used with a 6-foot divider and 12-foot left turn lanes at the

intersections. So at the Broadway intersection, at the Arno intersection and I-25, the median would come into play with left turns provided.

We also have a concrete wall barrier on the outside separating the roadway from the pedestrian and bicycle areas. Outside of the wall barrier we have either a multi-use trail or we have a combined bike lane and a sidewalk. That's going to be determined during the final design process as to what that configuration looks like.

This road cross-section illustrates the roadway on the bridge and the overpass bridge over I-25. The bridge will stay in place. It's about 110 feet wide and it will not be changed dramatically, but the deck and the configuration of the roadway on the deck will be changed.

What this represents, we have two lanes in each direction. We also have a left-turn lane in each direction. This is different from what we had previously, in that the original designs we were doing over three years ago had a double left-turn lane in each direction. We felt like at that time that was appropriate because we had forecast for higher traffic volumes. The traffic volumes that we're seeing now are going to be less than those

previously predicted, and I will get into a little more detail in a minute.

Then we have the left bike lane and the sidewalk on either side. So we provided for multimodal transportation all the way between Second Street and I-25.

This last cross-section is Woodward Road. Woodward has a single lane in each direction and a median area. We actually have a continuous left-turn lane. There's over 25 driveways along Woodward between Second Street and Broadway. In order to accommodate left turning into those driveways we put in the left turn lane. Along with that we provide bike lanes and sidewalks in both directions. And as I mentioned earlier, the three lane section looks like it's adequate to carry the traffic volumes for the 20 year design horizon. We designed for 2040 traffic.

One thing that's necessary as part of the environmental process is we compare the build alternative against the no build alternative. The no build alternative is set up as a baseline comparison. So the baseline in this case, the no build alternative, consists of no construction of this project. Basically, not building the project. That

means that this project as it stands today is not going to get done. Other projects and other configurations might get done. And Woodward Road, for example, Woodward Road is a city street and the city may have other plans for it beyond this project. There are none that we know of.

There would be no roadway connection therefore between Second and Woodward, Broadway and I-25. There would be no bike lanes. No other sidewalks or improvements. And again, those could be done potentially if another project was set up, but without this project they won't happen as part of this.

And future traffic growth would have to be accommodated with all the existing roadways. So Second Street, Broadway, Gibson, Rio Bravo and Woodward would have to carry whatever increases in traffic volume are forecast for the future.

So to initiate the environment process we have to define, after a needs analysis, we define the purpose and need of the project. And Mr. Quezada actually described quite a bit of the purpose of the project. But to put it into our transportation terms, we look at transportation system connectivity. We want to provide that connectivity with this.

1 Basically it was planning, and it was originally
2 started in the late 1980s and early 1990s. We want
3 to fulfill the intent of that planning and provide
4 that closure of a gap where a roadway doesn't
5 currently exist, but would really fill out the
6 transportation system. We therefore would provide
7 improved access between Second Street, Broadway,
8 I-25. This would have the benefit of congestion
9 relief and I described that with an earlier slide
10 also. It would certainly improve pedestrian/bicycle
11 facilities and those are a part of the need for the
12 project because in the existing condition there
13 really are no bicycle/pedestrian facilities in the
14 corridor. And also would have a benefit of providing
15 emergency vehicle access.
16 One thing that we have done as a big part of
17 these updates and revision that we've done with this
18 environmental assessment is look at the traffic
19 volume forecast. We worked with the Mid Region
20 Council of Governments to identify the traffic
21 forecast for the future. We're looking at 2040 as
22 our design year. Through the course of this project
23 we ran into issues where the traffic volume forecast
24 was shown to be very high. We went back with COG, we
25 worked with them and they worked with UNM and had

1 recently received new data from UNM showing forecast
2 for the future for population and employment to
3 actually be much flatter growth so we adjusted our
4 traffic volumes accordingly for lesser growth and
5 therefore we have different configurations in some of
6 our intersections.
7 The roadways themselves, Sunport, west four
8 lanes previously and continues to be four lanes. And
9 Woodward Road at one point in time we were showing an
10 ultimate four lane section for that, but we no longer
11 believe that that's necessary. So we're showing a
12 three lane section as proposed.
13 And then one issue that's always been part
14 of, or one result that's always been part of this
15 alternative or this environmental assessment and the
16 ones we did previously is a benefit to the area
17 relative to traffic shifts. With the introduction of
18 Sunport Boulevard into the mix the roadways north of
19 the project area, in other words Broadway north of
20 Sunport and Second Street north of Woodward,
21 experience significantly less traffic in the future.
22 We're looking at about 40 percent or so less traffic
23 on Broadway north of the project area with Sunport
24 Boulevard in place versus no Sunport or no build.
25 We see a benefit on Gibson as well with

about 21 percent of the traffic, a reduction of 21 percent of the traffic in the future. So what happens is Sunport then becomes a benefit in that it pulls traffic away from the area north where traffic would be currently using Gibson and use Sunport instead. So that area is really adjacent to the residential areas in the community and the community will see a direct benefit from that.

I'm going to turn this over to John Taschek now to discuss the environmental aspect.

MR. TASCHEK: Good evening everybody, again. I'm John Taschek. I'm with Ecosphere Environmental Services. And our role was to prepare the environmental assessment to consolidate and update the past studies.

And to add a little bit to what Elias Archuleta said about NEPA. This is a process that is intended to provide information to help make appropriate decisions. NEPA doesn't necessarily guarantee a project without impacts, but rather it provides information for better decisions.

NEPA really focuses on key issues, although we conducted natural and cultural resource studies and other environmental studies as part of the EA. I'm just going to focus on the key issues.

1 So air quality has been an issue that's come
2 up throughout the process many times. People are
3 concerned, in part, about many of the industrial end
4 uses that have been given air permits in the South
5 Valley and the impacts that may occur from those.
6 Those really aren't part of this project.
7 When we started the project the region the
8 County was designated as a limited maintenance area
9 for carbon monoxide under the Clear Air Act, under
10 those requirements we did a modeling for carbon
11 monoxide impacts as required with EPA models. The
12 results were reviewed by the Federal Highway
13 Administration and the conclusion was that the
14 project itself really has negligible impacts.
15 In 2016 the County was designated as
16 attainment for all pollutants covered under the Clean
17 Air Act, including carbon monoxide. But
18 nevertheless, we redid the analysis, the
19 microscale -- it's called hot-spot modeling with the
20 revised traffic forecast. And again, the impacts
21 that we found were really negligible. They were on
22 the order, right adjacent to the intersections in
23 question, of about .2 parts per million while the
24 standard is 35 parts per million.
25 The urban area has never been designated as

non-attainment for any of the other pollutants covered in the Clear Air Act and consequently there have never been transportation control measures or modeling required, so those really aren't impacts. And the same goes for mobile source toxic emissions.

Most of these pollutants are addressed by emission controls on manufactured vehicles. Those will be getting better and are projected to get better in the future and that's really the reason why Albuquerque's attainment and why there are no impacts related to transportation for this project.

Noise is another area where we did analysis. We did measurements in the project area and we did modeling with future traffic volumes with the proposed roadway geometry and what we found is that there are four sites, four individual sites, in the project area along Woodward at the intersection of Broadway that exceed the standards in the future. And all but one of these exceeds the standard presently. This is a noisy area. It has rail noise. It has air noise. It has a lot of auto traffic noise. It's an industrial area. Because the sites are isolated, individual residences, the driveway access onto the streets like Woodward and Broadway, there really is no way to create noise mitigation

through barriers. So noise mitigation is not recommended. Is not part of this project.

Land use has also been an issue. People are concerned that the project will induce growth in the area, that there will be dirty industry that moves in. The way the project is situated, it is actually in the industrial corridor. It lies between the San Jose -- the residential part of the San Jose Neighborhood and the residential part of the Mountain View Neighborhood. Basically it is an industrial corridor.

In the past, I think as the Commissioner mentioned, there has been planning. Notably the Southwest Area Plan that encouraged transportation facility and economic development and growth in this area. The area is also zoned for industrial development and it has existing development.

The County, in an effort to mitigate any potential land use impacts, because the County has listened to concerns in the past, is proposing to create a design overlay zone for the area for the Mountain View/San Jose Neighborhoods that would be intended to promote better development, design guidelines and so on to control development in this area in the future. So people will have an

1 opportunity to participate in developing that
2 planning process which is, as I understand it, just
3 starting out.
4 And I guess this slide sort of speaks for
5 itself. Even in the no build situation, the status
6 quo is an industrial situation. The area is
7 industrial as it presently exists.
8 The socioeconomic impacts and the
9 environmental justice are also very important topics.
10 Both these neighborhoods, the San Jose and Mountain
11 View area, have high percentages of low income and
12 minority populations. There has been several health
13 impact studies that have shown that this area has a
14 large number of industrial land uses that may produce
15 contamination. These HIAs indicate that there have
16 been health impacts in the area. Our environmental
17 assessment, although it didn't verify that
18 information, our environmental assessment attempted
19 to look at whether this project would have
20 disproportionate and adverse impacts on environmental
21 justice populations in the area.
22 We already talked about land use. The
23 project is in the industrial corridor. It complies
24 with the zoning. There are no direct takes of
25 businesses or residences. It doesn't split the

1 community.
2 I think Pete Hinckley talked a little bit
3 about the traffic increases, that's been a concern,
4 that there will be traffic, additional traffic, in
5 the neighborhood. The way the project will function
6 is, it will draw traffic onto the interstate before
7 it goes north toward the Gibson interchange and
8 through the San Jose Neighborhood. So there will
9 actually be less traffic to the north of the project
10 area, although Broadway and Second Street south of
11 the project will see more traffic. But this is
12 largely an industrial area.
13 We already talked about air quality and
14 noise. There would benefits in terms of improving
15 the multimodal network, the biking trail facilities
16 and also some economic impacts with a project that
17 will cost somewhere more than $20 million.
18 There will be significant jobs and wages and
19 economic output in the economy. The model that we
20 used shows somewhere in the range of 126 to $210
21 million in total output in terms of multiplier in the
22 economy.
23 Hazardous materials have been an issue right
24 from the beginning. When the Sunport interchange was
25 constructed in 1997 it was not extended to the west

because of the South Valley Superfund Site and some of the other contaminated properties. Since that time there has been significant improvement in terms of remediation and cleanup of these sites. And so our project construction will not impact any of the clean-up efforts and will be coordinated with the agencies and property owners that are involved in remediation.

Finally I want to say something about indirect and cumulative efforts. Indirect effects for this project primarily involve induced growth. It's likely that the area will experience some growth. I mean, in part because the hazardous materials issues have been cleaned up. In part because of the access that would be provided by the project and also in part because of the existing zoning and the proximity to the airport and the interstate. People expect this area to grow.

I already mentioned the County is making efforts to control the growth through the design overlay zone and to basically make sure that concerns about varying industry and other impacts are not realized. There will also be likely economic benefits in terms of jobs and wages and so forth that I already mentioned.

1 Cumulative impacts include other activities
2 in the region that have effects that cumulate with
3 this project. And these include transportation
4 projects like the Rio Bravo interchange in which
5 cumulatively should make the transportation system
6 work better. The east/west trails provided by this
7 project will have a benefit with the north/south
8 trails that are planned and already exist in the
9 project area, will make the system more complete.
10 There are several other development
11 proposals. The airport has a master plan. There's
12 Santolina, Mesa Del Sol. It's likely that these
13 projects will compete for development with
14 development in this Sunport area and it's hard to
15 know how the urban pattern will change, but those are
16 other cumulative effects.
17 Topics like air quality where no impacts
18 were identified in the EA are not considered to have
19 cumulative impacts. Topics like noise, which do have
20 some adverse impacts would have cumulative impacts
21 with the project. The same goes for the beneficial
22 impacts of things like improving the multimodal
23 system, there would be cumulative beneficial impacts.
24 So with that, that pretty much concludes the
25 summary of the findings, the key findings of the

environmental assessment. Part of the NEPA process is public input. We want to hear your concerns and issues and any information you have, that's why we're here tonight.

And I think Elias is going to talk a little bit more about the next steps. Thank you.

MR. ARCHULETA: Thank you, John. So where we go from here is, we'll move into the public comment period of tonight's hearing and from there we'll collect all the public comments that we receive tonight as well as comments that we will continue to receive or you're able to submit to us through July 31st. So once the comment period ends we'll collect all those comments, we'll prepare our input synopsis and determine if there's additional mitigation that needs to occur, other than what's already been noted in the EA. We'll finalize our environmental document and submit it to Federal Highways for their evaluation and determination.

Once we receive the final determination, if we receive a finding of no significant impact we'll continue on through design. If we do not receive a FONSI, then we will consider our options. But if we're able to move on to design we'll continue on with it, with design right-of-way acquisition. And

concurrent to that process our Bernalillo County Planning and Development Services Department will be beginning their Sunport design overlay. We'll also be running concurrent with the County's Public Art Program process, which will run independently of design, but will be included in the corridor if we're able to move forward. Once design is completed, if we continue on the schedule that we're anticipating, we expect to be in construction in early 2020.

So from here I'm going to turn this back over to Bill who will begin our public comment portion of the hearing.

MR. MOYE: Thank you, Elias. Before we start the public comments I'd like to go over this one slide with you. Verbal comments and statements for tonight, they're for the record. We also have via comment forms. I don't know if you had comment forms in the back, but they were back in the back and if you picked one up and you want to send something in, then it's available to you either by mail or fax and the fax numbers and the address are on the list or if you are going to be able to hand write it tonight, they'll take it at the end of the meeting.

Let's see, you can email your information also to the three emails that are up here. And that

is in your packet so I'm not going to read all three emails. And then the comments are all due by July 21st, which is not too far from now. Oh, the 31st, I sorry. I misread that.

If you want to review the environmental assessment document you can go to www.bernco.gov/sunport. It's light reading.

Anyway, from that we have the ground rules for this part of the program. So all comments, statements will be formally recorded by the court reporter over here. Please speak slowly and clearly. Identify your name and address for the record. Speak into the microphone. I'll have a microphone approximately where that camera is. The time period for the comments is five minutes and no longer. Longer statements can be submitted in writing. There will be a notification so that when you have 30 seconds left, I think Brian over here will hold up a yellow sheet of paper, that's your signal you have 30 seconds left, then he's going to hold up a red one when your time is up.

So on that note, our first speaker is?

MR. EICHWALD: Nora Garcia. Excuse me if I say your name wrong. Some of these are kind of hard to read.

MS. GARCIA: My name is Nora Garcia. I live at 236 Sunnyslope Street, Southwest, Albuquerque, New Mexico 87105. The Mountain View Neighborhood Association concludes that the Sunport Extension and Woodward Road Project was implemented for the sole purpose of increasing the number of industrial businesses in our northern border area allowing additional truck traffic congestion, hazardous pollution and more dangerous chemical industries to move in, further promotion of businesses such as hot mix and recycle asphalt plants from locating their businesses across from Mountain View Elementary School. Concrete demolition companies whose dust you can see for miles. And transloading facilities containing chemical hazards who are allowed to have train tankers to sit on the tracks endangering the community. This situation can lead to possible releases of hazardous chemicals and even explosions due to truck and train or other types of serious industrial accidents. You know for a fact that a safe distance for residences from potential chemical accidents, explosions and release of hazardous chemicals is at least five miles. Yet, you are willing to risk our lives by expanding roadways to accommodate more continually polluting businesses.

1 The Sunport Woodward Project will mean an increase of
2 large truck fumes from the traffic running on a
3 24-hour schedule, will further pollute the air for
4 local residents and subject them to even more
5 respiratory diseases and chronic and fatal illnesses,
6 such as asthma and cancer. You talk about how design
7 overlay standards are intended to have a positive
8 influence on development patterns and enhance the
9 character of the industrial area and adjacent
10 communities. However, what we see is the Sunport
11 extension is not about enhancing the character of our
12 communities, rather it is about assuring financial
13 gains for the few in the county at the expense of the
14 health and wellbeing of the many low income minority
15 residents living in San Jose and the community of
16 Mountain View. Since the concerns of Mountain View
17 and San Jose have not been thoroughly addressed by
18 Bernalillo County, the Mountain View Neighborhood
19 Association is asking for the Federal Highway
20 Administration to give the Sunport extension a no
21 build alternative or make the decision for an
22 environmental impact study to be completed to
23 thoroughly and truthfully examine all the negative
24 impacts the Sunport extension will have on the
25 communities of Mountain View and San Jose for many

decades. Thank you.

(Applause)

MR. MOYE: The next speaker is Steven Anaya. I mean, Abeyta. Steven Abeyta.

MR. ABEYTA: Hello, everyone. My name is Steven Abeyta. I reside at 2419 Williams Street. I'm where the Sunport extension is going to be. Past performance does not guarantee future results. This is what we're always told before making an investment. However, past performance is the best indicator to predict future results. It is a true fact San Jose and Mountain View are listed as environmental justice neighborhoods. It started way back in the 1900s with AT&SF all the way to GE. We were poisoned by many companies. GE used to dispose of hazardous materials by spraying it on the roads to prevent dust control. This led to our history and legacy of the first superfund site in the State of New Mexico. In addition, we have the Schwartzman landfill in our neighborhood. We were also poisoned again by AT&SF and another superfund site was added to our neighborhood. It is sad to report to all of you today the current state of affairs in the neighborhoods of San Jose and Mountain View. We are saturated with many polluting industries and many

more that are planning to move or increase their pollution. Many residents, some here in this room, have fought countless battles to prevent new polluting companies from locating in our neighborhoods. I have personally worked with Juan Reynosa, John Block, Eric Janz, Nora Garcia, Lauro Silva, Kitty Richards, Loretta Naranjo, Richard Moore, Angela West, Marla Paynor, Mark Rudd, Deanna Baca, Olivia Greenhouse, my wife Esther, and many more great people that care about us. We even requested the help from New Mexico Environmental Law Center, Southwest Organizing Project, Health Impact Partners out of California. We even asked the help of our elected officials, Tim Keller, Andres Romero, Isaac Benton, Kiki Saavedra, to work towards a solution to mitigate the environmental impacts we're enduring in the neighborhoods of San Jose and Mountain View. I know the environmental statement, it states that we have existing zoning and land use mechanisms to review and regulate development and overlay standards to protect us. Oh, gee whiz. Take a look around the room, in the audience, and look at all the people who have fought hard to prevent polluting companies from locating in our neighborhoods, and they'll say to you, "these

protections do not work." We know where we live and the environmental conditions in our neighborhood. So when we hear, only good industrial companies will locate in the area, our past performance and record, you'll realize more polluting companies are coming and we can't stop it. Our history shows we have the State's first superfund site and a reclamation facility with injection and remediation and test wells. This is our history. You can't take away our history. We also have a graveyard to the north of the extension. I say these well sites are of historical significance and the County cannot take away our history from us, even if it's a bad history. I'm familiar with the traffic issues affecting all of us, especially those that live in Mountain View. Many of us in this room think we're going to get a faster way home. We're not. In the environmental assessment it says that traffic is going to increase north. I mean, increase more south of Woodward Boulevard. It's going to increase more on Broadway. More traffic on Broadway. More traffic on Second. But guess what, the bureaucrats who are trying to dictate this project on us are going to have less traffic going downtown. Me, I personally ride my bicycle to work everyday. And the Sunport extension

1 says, we're going to make bike trails for the bikers
2 to get to work safely. I don't know if you've driven
3 a bike next to a semi traveling at 45 miles an hour,
4 it's not fun, it's not safe, and no one in their
5 right mind is going to walk their baby carriage up
6 the Sunport extension. Even though our history tells
7 us that there are many environmental issues in the
8 area of the Sunport extension plan, they did no
9 laboratory work. Somebody just came out, drove
10 around, did an assessment by -- a visual assessment,
11 looked at some aerial photographs and looked at some
12 web results. We need an environmental impact
13 statement to be performed. We cannot allow this.
14 And if you think it's going to help you, think again.
15 (Bell ringing)
16 (Applause)
17 MR. MOYE: Thank you, Steve. Is Esther
18 next? Esther Abeyta.
19 MS. ABEYTA: My name is Esther Abeyta. My
20 address is 2419 Williams, Southeast. I would like to
21 thank the New Mexico Federal Highway Administration,
22 Lisa Neie, Civil Rights program manager, for meeting
23 with me in the spring of 2012, listening to the
24 concerns I wrote to the Federal Highway External
25 Civil Rights Office in 2012 on the Sunport extension

adverse impacts the Sunport extension will have on the families of San Jose, for investigating how Bernalillo County Public Works and URS failed to take responsibility in 2011 and 2012 to follow the NEPA process and for failing not to do a thing on Woodward and Second Street. John Don Martinez and Greg Heitmann for forcing Bernalillo County Public Works and URS to address Woodward and Second Street. I would like to state the purpose of the proposed Sunport extension project reasons for proposing and needs for the Sunport extension to build on the reason of transportation system connectivity, improved access and circulation, balance traffic volumes and congestion relief, multiple transportation and emergency vehicle access are enough reason to justify to change the characteristics and quality of life of the residents of San Jose for many decades. This road project is only going to increase more truck traffic and the EA URS states heavy truck is more likely to use the proposed new interchange instead of local streets of Broadway Gibson. More likely is not a guarantee that heavy trucks will use the proposed road extension for a community that every day and night is exposed to idling trains and noise from train activity. Train

activity noise that exceeds the noise the city ordinance threshold decibels. Particulate matter from two idling trains in the community of San Jose are compared to a freeway in Los Angeles. Volatile organic compound smells of chlorobenzene and sulfurs San Jose are exposed from the polluting industries that surround the community of San Jose. For community members of San Jose and Mountain View every day, every hour, life is precious. Making the time to care for things that matter. Volunteering their time and effort to protect the safety, health, wellbeing of their families, neighbors and environment in their community. The analysis conducted in the EA indicates the implemation (verbatim) of the Sunport extension would not result in significant adverse impacts is not true. In fact, the Sunport extension will significantly impact the community of San Jose and Mountain View by bringing more polluting industries to apply for air permits. There is a term called cumulative impacts, which means to us, that all of the pollution, noise and traffic from all sources added up together is too much for a community to bear. We are the level right now and the Sunport extension would definitely push us past the livable thresholds. There was an

environmental assessment that was done on the Sunport extension in which the person doing the assessment looking around the area, research historical records and did interviews and this is what is done in the standard situation. However, the location of the Sunport extension is not located in a typical highway project location. The extension is located in a superfund site within a landfill buffer zone that may be leaking underground storage tanks and unknown contaminations in the right-of-way. A bit, an environmental assessment is sufficient for a typical site. This site is not located in an area called for environmental. This area is located for an area that an impact -- environmental impact statement, because it is located in a known polluting area and the risks are greater. They can be potential and undiscovered issues that can only be addressed after the excavation starts. We also need an environmental impact statement to be completed first because San Jose is an environmental justice neighborhood with two superfund sites. More importantly, because the project will severe impact the families of San Jose and Mountain View by bringing in more polluting industry to the area. The San Jose/Mountain View overlay has not been approved by the County and URS

has not included the overlay as a way to decrease the environmental impacts. URS also says we have existing zoning and land use mechanisms to deal with unwanted polluting companies. It is mentioned that the mechanisms rarely work. If you read the EA it did not submit new forms at the time of the writing of the EA. Interviews with the Schwartzman landfill were not received and also the EA is not a trustworthy conclusion and this is not a typical highway. So we need an environmental impact study. In San Jose we have too many promises broken and we have lost trust in the bureaucracy downtown trying to impose on us. We need (bell ringing) outside organization (bell ringing) to conduct scientific laboratory studies (bell ringing) on pollution and land population. Look at the impacts new companies located in there will have. The noise, cumulative impacts the Sunport extension will have on San Jose and Mountain View. This project is not about Roger Paul building his legacy. It is about the environmental legacy San Jose and Mountain View we are right now dealing with. The money from the project to be diverted to Mountain View to add sidewalks, flood control and repave the streets. And I have a community member here from San Jose that

mentioned that she would like to know who from San Jose/Mountain View who will be adversely impacted by this road project present here tonight, to please stand.

MR. MOYE: Thank you, Esther.

(Applause)

MR. MOYE: Victor Larranaga.

MR. LARRANAGA: My name is Victor Larranaga and I have a business at 3024 Broadway, Southeast, a small business. We employ, you know, 10 to 15 employees, and most of them are from the South Valley. And I think this would be a good project to go with, you know. I know that we are there every day, you know, and we see a lot of people just going up Woodward, you know, and throwing trash, you know. As a matter of fact, we stop almost on a daily basis, we stop somebody and says, there's not a dump up there, you know. You can't go and dump over there, you know. So we're doing a little bit to help the community and we think that this would be a great asset to the whole community there, you know. I hope that we can go along with that and continue to help the South Valley and its people, you know, with more jobs and better industry and things like that. Thank you very much.

(Applause)

MR. MOYE: The next speaker is Roberto Roybal.

MR. ROYBAL: My name is Roberto Roybal. I live at 2233 Don Felipe Road, Southwest. I'm President of the Pajarito Village Association and Vice President of the South Valley Coalition of Neighborhood Associations. I'm here today to talk in support of my friends and communities in the East San Jose and Mountain View communities and their neighborhood associations. As stated, there's a whole lot of issues that we see going on with this project. It's nice the assessment mentions environmental justice, but what it's going to do is, it's going to take us further away from environmental justice. I also believe that this extension is just going to bring more businesses, more industry down here, more polluting industries and we've got too much of that here in East San Jose, in Mountain View and in the South Valley entirely. That is against environmental justice. It's affecting people of color more and more. And we oppose it. I'm also very concerned that this -- once they do this extension, that it's going to dump all this traffic down into Broadway and Woodward and Second Street.

And right now living in the South Valley -- I work downtown and I drive down Second Street every day to work and back home and it's just getting -- the traffic is getting worse and worse. I don't think this road is going to alleviate that traffic. I think it's going to increase more traffic, more trucks, more these industrial businesses. It's going to increase the pollution, the smells of the petro chemical companies there. It's atrocious sometimes just driving down the road. And I oppose that. I'm also concerned that this will just be one step to extending the road west across the river and meeting the west side. And I've been very active in fighting the Santolina development on the west side and I think this will just be another excuse to help them build the road to build that development which impacts us in the South Valley. And I oppose that. And I am here to stand with my brothers and sisters, San Jose and Mountain View, because they were with us opposing Santolina because that was going to negatively impact the South Valley. And I also am curious why we know that Mayor Keller and the City of Albuquerque has pulled the city's support of the extension of the Sunport extension, so why is the County still trying to push this, just want to know

that question real simple. Thank you very much.

(Applause)

MR. EICHWALD: Next is Juan Reynosa.

MR. REYNOSA: Good evening, everyone. My name is Juan Reynosa with Southwest Organizing Project. 211 10th Street, Southwest, 87102. First I want to start my comments off around the initial site assessment that was done by URS. In particular, its limited hazardous material assessment. The ISA, or the initial site assessment, was done in order to evaluate the environmental concerns associated with the project. And I would say limited is the perfect word for this assessment. As Steve mentioned earlier, that assessment was done by surveys with the companies in the area searching databases and doing drive-by surveys of polluted sites. Yet, no actual testing of the soil or water was done in the project area. In their own words, no exploratory soil or groundwater sampling or lab analysis of soil waters or otherwise were performed. Thus, the initial site assessment acknowledges that, in their own words, currently unrecognized contamination may exist on the site and the levels of such contamination may vary across the site. Yet, if you read the EA there are three contaminated sites that are noted within the

1 right-of-way of the project. It's already been noted
2 that the South Valley Superfund Site, which is right
3 at Woodward, is still in the process of being cleaned
4 up. The Schwartzman landfill, as well Duke City
5 Fueling. I would say that it's already a ridiculous
6 premise to want to build a highway extension through
7 an ongoing site clean up. I don't think anything
8 should be built there until the full remediation of
9 that project has been completed. It's also noted
10 that with Schwartzman landfill there are no
11 designated boundaries for this. They may still not
12 know what is held in there yet. Both of these sites,
13 including Duke City Fueling, there are no hazardous
14 tests actually done. I just think this is a very
15 poor way of providing information to the community
16 around hazardous materials, especially since this has
17 been one of the biggest area of concern that the
18 community has continuously brought up and continues
19 to bring up tonight. It seems to be done in a way
20 that purposely assumes there aren't any hazardous
21 materials in the project area. And within that we're
22 told by URS that they did not find any indicators and
23 they should not assume liability for information that
24 proves otherwise. Their interpretation should not be
25 used as legal opinion, and it's used solely for the

use of Bernalillo County. It seems to me that they're making sure to relieve themselves any of liability regarding their limited hazardous materials assessment, because there's a large likelihood that if actual soil testing was actually performed, there would be a slew of hazardous materials found. Thus, this environmental assessment does not do its job assessing environmental concerns associated with the project if they're not providing real information on hazardous materials contained within the project area. I would also ask the question of, what other Albuquerque road project plans to build through a superfund site and an old landfill? I think that's a lot of extra baggage that this project is holding that raises a lot of red flags that the Federal Highway authority who would eventually approve this project should take note of. I'm assuming there's a lot of extra liabilities involved with that. And once they get to having to clean up these sites, the cost will increase dramatically. Moving on in regards to the section on environmental justice. I find it interesting that none, absolutely none of the 11 potential impacts found on Table 46 were shown to have any potential impacts for the project. I completely disagree with the assessment done earlier

that there will be no impacts on this already overburdened community. 11,000 cars coming in right next to your neighborhood and you think there's going to be no air pollution or noise impacts on your community. So think about what that would do to your neighborhood and think about the impacts there. This report even acknowledges that the project may facilitate roads in the polluting industry and that's exactly what we've been saying and the community has been saying all along, that that's exactly what this road will bring. Yet, they claim -- the County claims the design overlay standards will help mitigate this. But as Esther and others mentioned before, that is not an actual document or a piece of policy yet. It is a carrot hanging in front of people to make it seem like what we're saying isn't going to happen, won't happen. But I will say that until that is actually a valid document, that's a lie and they shouldn't be saying that as a claim to ensure that what the community has been saying all along won't happen. That's not good enough. Economic growth doesn't mean better public health, so you can't uphold that as better quality of life for a community. So once again, Southwest Organizing Project stands with the community (bell ringing)

against this project and it should not be approved. Thank you.

(Applause)

MR. EICHWALD: Next is Richard Moore.

AUDIENCE: Richard had to leave.

MR. EICHWALD: We'll go to the next person. Alfred Volden, please.

MR. VOLDEN: Good afternoon. My name is Alfred Volden. I live at 3215 Second Street, Southwest 87105. I'm a third generation resident of this area. My family has lived continuously in this area for 115 years. I am a proponent of this project. I only see positive support that will occur in the area with this extension. It will create job creation and it will bring clean industry. As a land owner of land surrounding this we have implemented restrictive covenants that prohibit noxious uses for that. This is an economic development area for the County that the entire Bernalillo County can be proud of, and for the future. It has been blighted in the future and it's time for this area to shine. So I am a supporter of this.

(Applause)

MR. EICHWALD: Next is Andres Romero, State Representative.

REPRESENTATIVE ROMERO: Good evening, everybody. My name is Andres Romero. I live at 4503 Valley Park Drive. So since I was elected to the legislature to serve, in part, the communities of Mountain View and San Jose, I always heard at the legislature that we're short on money for various reasons, and community projects in particular. When I've gone out to your communities I've asked what projects do you prioritize for your area and for your communities so that we can make the best of the money that is available to us. Not once did I hear this project being a priority for these communities. So I also don't understand the benefit to the communities, that has not been made clear to me at all. One of the stated benefits is congestion relief. However, as has been mentioned, there's going to be increased truck traffic throughout the project, which can only indicate the use of this road by heavy industry. We have a few projects, one that is ongoing, the I-25 Rio Bravo interchange that is to relieve the congestion that us in the South Valley and in these communities feel. The Federal Highway Administration and the New Mexico Department of Transportation have also done an I-25, south I-25 corridor study. And a part of that study is restructuring and rebuilding

I-25 and Gibson. That would also go a long way in reducing the congestion and traffic in our communities. It's also a much more viable project to explore than this Woodward/Sunport extension. So I don't know any of businesses, and again this has been stated, but I don't know of any businesses, other than heavy industry, that would want to locate near a site or sites that are being remediated, other than heavy industry. So in this I stand with a lot of community members from Mountain View and San Jose on opposing this project and hope that we can get moving on some of the other priorities, like the south I-25 corridor and make that more of a priority than this project.

(Applause)

MR. EICHWALD: Next is Maria Globus.

MS. GLOBUS: My name is Maria Globus. I'm at 531 Shirk Lane, Southwest, Albuquerque 87105. I'm nervous. This is kind of intimidating. But I really want to speak to you all, gentlemen, because -- and all the government people here in the audience, because I feel like Mountain View and San Jose are kind of like stepchildren, or maybe it's all the residential areas, I don't know. I doubt it. But it feels like you're really indifferent to what our felt

experience is here. And I don't understand why you're bringing in Second Street to this whole thing. I can understand Broadway, if you must. I mean, I guess the money is burning some hole in somebody's pocket. But I don't understand the Second Street thing. There's probably some kind of project in the future that we don't know about, but Second Street is our street. You've taken all kinds of stuff from us. You pollute the air, you've zoned everything so all this heavy-duty commercial businesses can come in, tremendous pollution, and the danger to us in case of accident. You don't need to do this. You don't need to do this.

(Applause)

MR. EICHWALD: I think the next name is Paul M. Chavez.

MR. CHAVEZ: My name is Paul Chavez and I live in 2209 Elm Street, Southwest. And I think this project should have been done 30 years ago and the reasons are because -- one of the reasons is noise. The off ramp on I-25 to Gibson has been a thorn in our side for 30 years from the trucks using their jake brakes early in the morning, late at night. And not only that, we heard about the environmental -- or the hazardous point. In the '80s there was a gas

truck that overturned right there on Broadway and Gibson going east. It dumped the gas all the way down Broadway. It went into the sewer next to East San Jose and the fire department, they evacuated the school. The fire department poured water into that drain for 24 hours. Another thing, a tar truck turned over in that same intersection. Two gravel trucks turned over going west and south on Broadway in those years. Now, it hasn't happened again, but it's real possible. I count the trucks, because I live right on the corner, the northwest corner of the freeway and Gibson. There's 20 to 30 gas trucks that come off that freeway and go back up every day. You're talking about the fumes and the environment for the school, for the kids. The study that they've taken here that the traffic is going to increase in the next ten years quite a bit. Is it all going to come down Gibson and down Broadway? It can't. We need this extension, no matter what everybody else says. It's progress, people. Get over it.

(Applause)

MR. MOYE: Daniel Chavez.

MR. CHAVEZ: Hello. My name is Daniel Chavez and I live on 924 Ross Avenue, Southeast. So I ride my bike every day and I always find my commute

from south -- going south on Broadway and then from there going to CNM, every day. And in the community people don't realize that when you're biking that it's just as much of a hazard as being in a car, because there's less safety to us. And I think the project would be a benefit because they would build sidewalks. I am one -- I, for one, am not for riding on the bike lanes on the road because I've been hit three times. Once was by a cop. And it really doesn't matter where you're at on the road, you have to watch yourself regardless. So I think sidewalks are good definitely for all of us, especially for the children in that area, because there's no sidewalks there right now. Even like just for transportation from the airport, to and from there, would help. The congestion would go down and also emergency services would be able to access that neighborhood from a different position in the city versus where we stand now without that passover. And not only that, it would propose growth for businesses, engineers and electrical people, construction people, they would all benefit from this. But coming from that, I think an environmental impact report is definitely required because there's people that live here and we matter and we're not going to go away just because this is

built. And if you're going to build this, have some respect for the neighbors and people that live here, because this is the air I breathe every day, this is the air I wake up to, this is the air I go to sleep in. So I would like to have some respect as far as environmentalwise. You know, the businesses that thrive in our neighborhood, I'm not too proud of them either. I'm not too proud of what's been hidden from us and what is hidden still from us. So definitely, care for the environment is required. I think it's all okay when people come and build and make progress on our land and pollute our air, but I know that if we were to go to their side of town they would fight it because they see a side that we don't until they're threatened and they have to fight for it. So I'm for it, but at the same time I think there's respect due to the community. Thank you.

(Applause)

MR. MOYE: The next speaker is Lauro Silva. Lauro Silva, going once, going twice.

AUDIENCE: Might have stepped outside.

MR. MOYE: Rachel Riboni.

MS. RIBONI: Hi, my name is Rachel Riboni. I am a resident of Mountain View. I am also on the board and have worked with HIAs matters in the past.

I don't think that this has been -- should be approved as it is. I agree that progress -- that we need to move forward with progress, but we also have to go and look at what has been done and what has not been addressed, which is air quality and the traffic, the safety and poor planning on Second Street. You showed a picture, a slide, of Second and Woodward and what that six-foot fence contains inside it is debris and a lot of fugitive dust and that goes towards the river and contaminates the water, plus all the neighbors. And, yes, we do have problems with air quality and it is not addressed. The EPA does not cover all of this. I live down the road on Williams. We have a problem with all the trucks already coming down from there and fugitive dust from all the businesses and a lot of contamination on the ground, and the air, and the noise. And this is what we have to look forward to with this. The clean -- the site that they did clean up, that's great. It's a great thing that that happened, but we don't want to contaminate it again. We want something nice. I think that Second Street was a disaster as far as the planning across, because that's a beautiful area for the bosque, but it was all -- we have port-a-pots there now and we have all this debris and build up

from all the -- we have what we have right behind my house, which is on Williams and Rio Abajo down the road south from here. And it's going to be the same thing. Air quality, no one addresses it. No one does anything, EPA. As far as the State goes and monies, the school, we have Mountain View here. We have children that we have to consider their health. We have a lot of cancer. We do have a lot of problems with breathing. I'm kind of shooting from the hip here. But this has been going on for years, over 15 years. We got the Railrunner. We got the airplanes. We got the train. We got the traffic, all the diesels, and yet we have one of the best EVAC systems for sewage and no one has been forced to connect to it. And I don't know what they're doing with all the gray water. But we need to address sidewalks, yes. Bike lanes, of course. But we also need to have -- take into consideration the air quality that these kids are going to be -- we have lead in the soil. We have other issues. We have too many issues to bring more oil and different things, because they just change the standards instead of addressing it. And yes, we did have several spills. We had a spill from the place up on Broadway and yet no codes are enforced. And we have over a hundred

places here with at least 75 citations on my -- this little area here, so how do we expect to enforce everything on Woodward, and the studies and the air quality and so forth and so on. We have too many contaminates already. I don't agree with it -- with this until it's further studied or some of the sites and codes are enforced. Thank you.

(Applause)

MR. MOYE: Marisol Archuleta.

MS. ARCHULETA: My name is Marisol Archuleta. I live at 3615 Big Cottonwood Drive, Southwest 87105. I live in the area that is just behind Second Street and Rio Bravo, an area that wasn't really included in this environmental assessment, though I definitely know that we will be experiencing the impacts of this road that we do not want. We live in an area where during rush hour traffic Second Street gets backed up a lot going south and people like to cut off onto the side, onto the dirt, where there is no sidewalk and then they cut through my neighborhood and they drive very fast so that they can get onto Rio Bravo and skip out through all the traffic. Now this environmental assessment says that the traffic now is going to increase even more going south on Second Street. In

the morning times there are bus stops at the entrance of my neighborhood and at the exit of my neighborhood and I have seen children almost get run over three times from people going -- rushing through my neighborhood to try to cut through. And I see this road as only impacting this and making my community more unsafe. I know I heard over and over that things are zoned this way, environmental justice won't be impacted. I also see in these slides, it feels like the writing is kind of on the wall. So in the next steps you're saying you're going to collect all of our public comments, go through this process of reading them and then you're going to begin construction, so I feel like the decision's already been made here. I know that I personally have spent hundreds of hours researching, giving public comment, begging my elected officials to represent me. Andres Romero is one of the only ones who's come to speak on behalf of the community. And if you can recall in his comments what he has said is that from speaking to community members, there are a lot of problems in our community, but this is not one of the things that we want our resources spent on. And I really hope that our elected officials can hear that from us. And I really wish that people who are hired to do

these environmental assessments would actually speak to the people who live in the areas, take a little bit of time to dig a little bit deeper, not just use data, not just do drive-bys, but actually take -- do some actual testing to verify all of these things. We deal with a significant amount of health problems. Our children's schools are located right across the street from industry. We are constantly battling things against our own elected officials that are supposed to be protecting us. I sat here and watched -- you know, I watch our elected officials scroll on their phones as we give public comment. I know that we had to fight to have interpreters available for meetings so that our community members could be here. There's a reason that they call this neighborhood an environmental justice neighborhood. And to hear the contractor say that none of this will impact us, is infuriating. And it doesn't make me have any -- give him any credibility. And I don't know how much of my tax money was spent to pay him, but I feel very uneasy allowing that type of report to represent what's really happening in my community. Thank you.

(Applause)

MR. MOYE: Thank you. John Hunter.

MR. HUNTER: Good evening. My name is John Hunter. I live at 221 Rossmoor, Southwest 87105. Right in the area where this lady just got through speaking. We are impacted with a lot traffic from Second Street. In the afternoon traffic is backed up sometimes clear to Woodward across the tracks on Second Street. My biggest concern though is, why would you build a road for the west side which only goes one block? One block. Then it goes south to Rio Bravo and to Rossmoor, which is going to make Rossmoor a thoroughfare. It's heavy traffic now. And the kids playing out there, if they lose control of their scooter or their bicycle, they'll get run over by speeders. These people come across that ditch on Rossmoor about 60 miles an hour, some of them do. These things, it's going to impact Rossmoor and that Rossmoor addition tremendously unless they build a flyover over a Giant. So without a bridge this is a useless project.

(Applause)

MR. MOYE: Mark Rudd.

MR. RUDD: Thank you. My name is Mark Rudd. I live at 506 Valley High, Southwest. I'm a retired teacher at CNM-TVI. The other day I found myself on I-25 coming south from Paseo Del Norte. It was rush

hour, five o'clock. I thought, well, this is going to be a piece of cake, because they just built four new lanes. They just finished a complete remodel. Four lanes coming south with new access ramps. The traffic was just as bad last week as it was before the remodel. It's almost a law of urban planning that the more roads you build, the worst the traffic becomes. Look at L.A., look at Phoenix, Denver. We don't want to become like them, right? Plus one other thing, even bigger than that, every single person in this room knows that global warming is a terrible problem. It's a crisis. The west is burning right now. We have to stop doing what we're doing, which means burning fossil fuel. In all good conscience, the only moral thing to do here is to stop road improvements and build mass transit, especially for an airport. It's ridiculous to keep exacerbating the crisis of global warming. It's a moral problem. Even the Pope says it. Really, I mean, your jobs will be just as good. You'll have just as good jobs in a renewable energy economy with mass transit. No more road improvements. Stop global warming. Got to do it.

(Applause)

MR. MOYE: We have a trio here. Angela,

Loretta and Bianca. Maybe it's not a trio.

MS. VIGIL: I'm Angela Vigil and I'm representing Martineztown Santa Barbara and Victory Hills Neighborhood. And I am here to support the residents of South San Jose. I know Esther. We've worked with Esther for many years. And she's told me about her health problems throughout the years, and it breaks my heart. She's my friend and I watch her suffer.

MS. NARANJO-LOPEZ: My name is Loretta Naranjo-Lopez and I'm the President of Santa Barbara Martineztown Neighborhood Association. And I am here to support the community of San Jose and Mountain View. I agree with the previous speaker, if we keep building roads we'll keep getting more traffic. That's common sense. So we need to stop building them and really start planning in our communities and looking at the impacts that are already existing for these communities with the polluting industry. Thank you.

(Applause)

MR. MOYE: Art De La Cruz.

MR. DE LA CRUZ: Good evening, everyone. It's my pleasure to be here. I reside at 1800 Elena Circle, Southwest. I have lived there my entire

life. I currently reside at the same location, actually next door. My wife and I built a house with my two adult children, and my wife. I'm 62 -- I'm going to be 62 years old this December. I've never lived anywhere else, except in the South Valley. And I wholeheartedly support this project. I supported it from the first day that I got on the County Commission. And the reason that I supported it is really, I think something that's being left out. Environmental justice is absolutely important and I am glad to share that and others have shared this evening that much has been done to mitigate the pollution that occurred historically. What's being left out of this equation and one of the reasons that I ran for the County Commission was because of economic justice. Economic justice. Growing up as a little boy in the South Valley in the 1960s, I saw a time where Isleta Boulevard was an active, vibrant commercial, living community. Space. When the malls came in, the same thing that hurt downtown, hurt the South Valley. We had a place where you could buy a suit once upon a time. We had a place where you could buy a pair of shoes or a book, we had that. It went away. And in the time that I was growing up, and one of the things that I ran as a platform on,

was that we would bring places for people to shop, where people could eat, where they would have good spaces where they could walk, and we worked tirelessly to make that happen. And somebody talked about earlier, somebody said, pass performance indicates future performance. You're absolute right. And if you look back in the short history of about eight years, what do you have now? You don't have any new polluters in the community. Anything that is polluting that you consider a polluter was here. Some of those polluters were here before you were here. But we do have U.S. Foods. We do have Admiral Beverage. I helped negotiate Wagner, which has broken ground now on the corner of Interstate 25 and Rio Bravo. What has that meant? What has Las Estancias meant on Rio Bravo and Coors? It has meant shopping opportunities so you don't have to drive as far. So you don't have to drive that car and pollute the environment so much, that's what it's meant. Now let me share with you something that I asked my friends, my neighbors, that do not support this project. Let me have you please consider this. I'm going to be a little cynical now, because I've heard cynicism for a long time. I know that probably what I say with fall on deaf ears, but it doesn't matter.

I have a responsibility to say it anyway. What I will share with you is that you need to be careful of what are called unintended consequences. Even if you have the ability to shut that project down, if you ignore the fact that the scientists and engineers have said it's not going to be a negative impact, I will tell you about unintended consequences. Right now those properties, a vast majority of them, there's about a thousand acres that are undeveloped. If you look at those properties they are already zoned industrial. That is an entitled. That is something that they have. And if you don't allow that project to move forward, what will happen is that you're going to get, at some point in time, it will happen, you will have new companies that come in there. You will have new industries that come in there. And they're very likely to be exactly the ones that you do not want to be there, because that is an entitlement. They have a right to be there. They will be there. But if you open up that corridor and if you look at the County's planning and if you consider what the County Development and Planning Department in the past has done, they are after good, clean industrial development. That is what they're after. That is what they want. That is what we need

for jobs. That is exactly what we need. So I will tell you that opening up that corridor will open up opportunity for good, clean, smart, not only retail opportunities, but also for good, clean industrial. Or consider what you may have the other way by trying to shut it down. Thank you.

(Applause)

MR. MOYE: It appears that everybody that signed up has been able to speak. I want to draw this meeting to a close and tell you thank you. Thank you for being here. Thank you for your comments. I think a lot of people had a lot of good things to say and I believe our panel will review those and do what's right. Thank you.

(Record closed at 8:25 p.m.)

REPORTER'S CERTIFICATE

I, Kim Kay Shollenbarger, New Mexico Certified Court Reporter, No. 236, do hereby certify that I reported the foregoing proceedings in stenographic shorthand and that the foregoing pages are a true and correct transcript of those proceedings taken to the best of my ability.

I FURTHER CERTIFY that I am neither employed by nor related to any of the parties or attorneys in this matter and that I have no interest in the final disposition of this matter.

_____
Kim Kay Shollenbarger
CCR No. 236, RPR
License Expires 12-31-2018

New Mexico Interfaith Power and Light
PO Box 27162, Albuquerque, New Mexico 87125 www.nm-ipl.org**info@nm-ipl.org**505-266-6966

July 24, 2018

Re: Sunport Extension into San Jose neighborhood

Dear Mr. Hinkley and County Leaders,

I write to express opposition to the Sunport Extension into the San Jose neighborhood. The community does not support this project. They have sent in public comments on at least three environmental assessments.

Continuing to pursue this project in a neighborhood which has so many environmentally polluting businesses and industries posses environmental justice and ethical concerns. The air quality in San Jose is already compromised, as is the health of those who live there.

In addition, I am confused that this project is being brought forth since Mayor Tim Keller in May of this year publicly stated that the City of Albuquerque was withdrawing its support for the Sunport Blvd. Extension Project. Why is the County pursuing this project at the cost of taxpayers?

I request that the County close the pursuit of this project on the grounds of environmental justice and cost to taxpayers, when the city of Albuquerque has already stopped this project from consideration.

Thank you for your time and serious consideration.

In peace and good,

Sister Joan Brown, osf
Executive Director, NM Interfaith Power and Light

Hinckley, Peter

From: Nora Garcia <ngarcia49@yahoo.com>
Sent: Monday, July 30, 2018 8:04 PM
To: Hinckley, Peter
Subject: RE: Sunport Extension / Woodward Blvd. Project
Attachments: SUNPORT PROJECT.docx

Public Hearing Comments.

Thank you,

Nora Garcia: President MVNA
236 Sunnyslope St. SW
Albuquerque, NM 87105
Phone: (505) 414-1621
E-mail: ngarcia49@yahoo.com

SUNPORT EXTENSION / WOODWARD RD. PUBLIC HEARING

JULY 19, 2018

The Mountain View Neighborhood Association concludes that the Sunport Extension & Woodward Road Project was implemented for the sol purpose of enhancing the industrial use of businesses in our northern border area, allowing truck traffic congestion to further promote businesses such as transloading facilities containing chemical hazards and allowing train tankers to sit on the tracks with possible faulty release values which could ignite and explode.

This is the way we view your Design Overlay Standards intended for positive influence development patterns and enhancing the character of the area. Yes, for your own financial gain and at the risk of several low-income and minority residents living in San Jose and the Mountain View Area.

You know for a fact that a safe distance for these explosions is a distance of five miles minimal. Yet you are still trying to sustain roadways for accommodating these continual polluting businesses while the fumes from these trucks running on a 24 hour schedule are polluting the air quality of the residents and subjecting them to respiratory diseases, and illnesses such as, asthma, cancer, etc.

Nora Garcia: President
Mountain View Neighborhood Association
P.O. Box 19081
Albuquerque, NM 87119-9081

E-mail: ngarcia49@yahoo.com

Public Hearing Comment Sheet

(please print)

Sunport Boulevard Extension / Woodward Road Improvements
Environmental Assessment
Bernalillo County Project No. TS 09-06
NMDOT Project No. CN A300160 & A300161

July 19, 2018

Please submit your comments by July 31, 2018.

SEE attached papers

Mail To:
AECOM
Attn: Peter Hinckley
6501 Americas Pkwy. NE/ Suite 900
Albuquerque, NM 87110
(505) 855-7409 or fax (505) 855-7555
E-mail to: Peter.Hinckley@aecom.com

Your Name: John D. Hunter
Address: 221 Rossmoor S.W.
Albuq., New Mexico 87105
Phone: (505) 459-4680
E-mail: hshmom@comcast.net

The extension from Sunport Blvd. and Woodward Rd. will have a very negative impact (without a bridge) on the Mountain View community and neighborhood. Especially the Rossmoor addition.

It is supposed to help the west side. But it only goes one block west of the railroad tracks, then it literally goes south.

Without a bridge it is a waste of money. It will have a very negative impact on 2nd Street, Rio Bravo and the Rossmoor addition.

Thank-you,

John Hunter

221 Rossmoor Rd. SW

Albuquerque, New Mexico 87105

e-mail: hshmom@comcast.net

Due to the increase of traffic in the Rossmoor area, people are using this street as a shortcut in the mornings and evenings. Wherever people and cars are in close proximity, traffic safety is a heightened concern.

We are against the Sunport Boulevard Extension, because people already use our neighborhood as a shortcut. If the project goes thru it is going to have a very bad impact on 2nd Street and Rio Bravo neighborhoods worse than what it already does. It will be another mess of bumper to bumper cars thru the Rossmoor neighborhood. It will also make it hard for all of the people who live here to get in and out of their driveways.

Since school is getting ready to start, the school buses will have a hard time getting thru. But most important, **It will be very dangerous for our kids at the bus stops.** We have already seen people not watch for them when they started the freeway project.

The Sunport Boulevard Extension is supposed to be good for the west side. But from the railroad tracks to 2nd Street it is only about one block west. Then it **literally** goes south. It is supposed to be for the west side, but the west side is over the river.

Public Hearing Comment Sheet

(please print)

Sunport Boulevard Extension / Woodward Road Improvements
Environmental Assessment
Bernalillo County Project No. TS 09-06
NMDOT Project No. CN A300160 & A300161

July 19, 2018

Please submit your comments by July 31, 2018.

I feel that we haven't received enough information about this project. The presentation was very hard to understand because of the wording used. I have lived here since 1967 and we've always been dumped on. There is no benefit for the community. This is very sneaky and someone has an personal agenda.

We do need sidewalks and better paths but we don't need the traffic and the noise. We already have porta potty storage, construction waste and junk yards; we need walls to hide these eyesores and we need government to control development.

I oppose this plan

Mail To:
AECOM
Attn: Peter Hinckley
6501 Americas Pkwy. NE/ Suite 900
Albuquerque, NM 87110
(505) 855-7409 or fax (505) 855-7555
E-mail to: Peter.Hinckley@aecom.com

Your Name: Connie D Martinez
Address: 209 Alvajo Rd SE Alris N.M 87102
Phone: 5058438462
E-mail:

Public Hearing Comment Sheet

(please print)

Sunport Boulevard Extension / Woodward Road Improvements
Environmental Assessment
Bernalillo County Project No. TS 09-06
NMDOT Project No. CN A300160 & A300161

July 19, 2018

Please submit your comments by July 31, 2018.

2015 Traffic counts indicate there is enough traffic at the 2nd/Woodward intersection to have a stop light.
Bernco should evaluate the installation of a stop light prior to the start of the Sunport Extension.
The increase in westbound traffic on Rio Bravo just causes drivers to seek alternate routes and 2nd Street is one of those alternate paths to get to Rio Bravo.
When turning south on 2nd street from Woodward there is poor visibility looking North due to a curve in the road. The sooner a traffic light is installed, the safer the intersection will be.

Mail To:
AECOM
Attn: Peter Hinckley
6501 Americas Pkwy. NE/ Suite 900
Albuquerque, NM 87110
(505) 855-7409 or fax (505) 855-7555
E-mail to: Peter.Hinckley@aecom.com

Your Name: Evelyn Costello
Address: 1809 Del Norte SW
Albq 87105
Phone: 877-9288
E-mail: evelyncostello@msn.com

Public Hearing Comment Sheet

(please print)

Sunport Boulevard Extension / Woodward Road Improvements
Environmental Assessment
Bernalillo County Project No. TS 09-06
NMDOT Project No. CN A300160 & A300161

July 19, 2018

Please submit your comments by July 31, 2018.

I was initially "for" both projects because of adding more bike infrastructure. After hearing the presentation and community comments, I am going to say NO to both projects. It sounds like this project is going to gentrify the San Jose and Mountain View communities, and that is something I morally can not support. Plus, more pollution means environmental racism. I am going to go with the no build option and wait for another project to take on bike lanes or revisions to this current project.

Mail To:
AECOM
Attn: Peter Hinckley
6501 Americas Pkwy. NE/ Suite 900
Albuquerque, NM 87110
(505) 855-7409 or fax (505) 855-7555
E-mail to: Peter.Hinckley@aecom.com

Your Name: Irene Entila
Address: 415 Columbia Dr. SE Albuquerque, NM 87106
Phone: 263-4530
E-mail: ientila@icloud.com

Public Hearing Comment Sheet

(please print)

Sunport Boulevard Extension / Woodward Road Improvements
Environmental Assessment
Bernalillo County Project No. TS 09-06
NMDOT Project No. CN A300160 & A300161

July 19, 2018

Please submit your comments by July 31, 2018.

This is an important project to connect the South Valley to the Sunport. It will also provide another connection to I-25 saving commuters time and the movement of goods. It will also bring needed improvements to Woodward Road. And it will also lead to economic development.

Mail To:
AECOM
Attn: Peter Hinckley
6501 Americas Pkwy. NE/ Suite 900
Albuquerque, NM 87110
(505) 855-7409 or fax (505) 855-7555
E-mail to: Peter.Hinckley@aecom.com

Your Name: Gerald V. Bowe
Address: 216 12th St. NW
ABQ, NM 87102
Phone: 505-977-1562
E-mail: jerrybowe@yahoo.com

From: Hinckley, Peter
Sent: Tuesday, July 24, 2018 3:14 PM
To: Johnson, Alexandria
Cc: John Taschek
Subject: FW: Sunport Woodward Comment

For filing

Peter C. Hinckley, PE
Principal Engineer, Transportation, Rocky Mountain Area D 505-855-7409 C 505-948-4090
Peter.hinckley@aecom.com

AECOM Technology
Rocky Mountain Area
6501 Americas Parkway NE, Suite 900, Albuquerque, New Mexico 87110 www.aecom.com

-----Original Message-----
From: Enrico Gradi [mailto:egradi@bernco.gov]
Sent: Tuesday, July 24, 2018 3:08 PM
To: Hinckley, Peter; Free Radicals
Cc: Rodrigo L. Eichwald; Johnson, Alexandria; John Taschek; Edward Lopez
Subject: RE: Sunport Woodward Comment

Good afternoon Mrs. Morningstar,

Thank you for reaching out to us. We will keep your contact information so that you can be made aware of the plans progress. The intent of the overlay is to provide a set of design standards that incorporates some fundamental design standards regarding, landscaping, building materials, loading and unloading orientation etc. This are elements to encourage a quality commercial and industrial employment area.

Please let us know if you would like to meet with our staff as this process moves forward.

Sincerely,

Enrico Gradi

Enrico Gradi
Director
Planning and Development Services Department
111 Union Square SE, 3rd Floor, Albuquerque, NM 87102
Email: egradi@bernco.gov
O: (505) 314-0385 C: (505) 280-6735
www.bernco.gov

-----Original Message-----
From: Hinckley, Peter <peter.hinckley@aecom.com>

Sent: Tuesday, July 24, 2018 2:30 PM
To: Free Radicals <nan@freeradicalshq.com>
Cc: Enrico Gradi <egradi@bernco.gov>; Rodrigo L. Eichwald <rleichwald@bernco.gov>; Johnson, Alexandria <alexandria.johnson@aecom.com>; John Taschek <jtaschek@ecosphere-services.com>; Edward Lopez <elopez@bernco.gov>
Subject: RE: Sunport Woodward Comment

Ms. Morningstar:

Thank you for your comments and attendance at the Sunport / Woodward Public Hearing. The Design Overlay District is being developed by Bernalillo County's Planning Department, with the Overlay District project being managed by Elvira Lopez; Enrico Gradi is the Department Director and past manager of the District project. I recommend that you communicate directly with Elvira or Enrico regarding the public involvement process and development of the Overlay District.

Peter C. Hinckley, PE
Principal Engineer, Transportation, Rocky Mountain Area D 505-855-7409 C 505-948-4090
Peter.hinckley@aecom.com

AECOM Technology
Rocky Mountain Area
6501 Americas Parkway NE, Suite 900, Albuquerque, New Mexico 87110 www.aecom.com

-----Original Message-----
From: Free Radicals [mailto:nan@freeradicalshq.com]
Sent: Tuesday, July 24, 2018 2:15 PM
To: Hinckley, Peter
Subject: Sunport Woodward Comment

Good afternoon Mr Hinckley,

My name is Nan Morningstar and I am a resident of South Broadway neighborhood. I attended the Public Hearing on July 19th.

I am curious about the Overlay Standards for the project. It was mentioned that they are yet to be written. Are they to be a simple zoning overlay or will there be incentives as well? What types of businesses are being kept away and what sort are being courted? I'd like to be kept in the loop on the overlay process.

Thanks for your time,

Nan Morningstar

2022 Edith Blvd SE

--
Nan and John Morningstar, Owners
Free Radicals

Albuquerque, NM 87106
505-254-3764
www.FreeRadicalsHQ.com

Johnson, Alexandria

From: Hinckley, Peter
Sent: Monday, July 30, 2018 11:16 AM
To: Johnson, Alexandria
Cc: Rodrigo Eichwald Rodrigo L Eichwald (rleichwald@bernco.gov)
Subject: FW: Sunport Extension/Woodward Road Improvements

Alex
Please file

Peter C. Hinckley, PE
Principal Engineer, Transportation, Rocky Mountain Area
D 505-855-7409 C 505-948-4090
Peter.hinckley@aecom.com

AECOM Technology
Rocky Mountain Area
6501 Americas Parkway NE, Suite 900, Albuquerque, New Mexico 87110
www.aecom.com

From: rrnabq [mailto:robert.nelson.abq@gmail.com]
Sent: Monday, July 30, 2018 10:59 AM
To: Hinckley, Peter
Cc: jtaschek@ecosphere-services.com
Subject: Sunport Extension/Woodward Road Improvements

Dear Mr. Hinckley,

My name is Robert Nelson and I am a resident of Wells Park and I am writing to submit comment for the Sunport Blvd Extension/Woodward Road Improvements. I do not support the project and I've described below the many points as to why I do not support it. Thank you for your time and service.

Robert Nelson

RE: **Sunport Blvd Extension/ Woodward Road Improvements**
April 2018 Environmental Assessment
Control Numbers: A300160 and A300161

Comments:

The April 2018 Environmental Assessment (EA) prepared by AECOM (URS) and Ecosphere Environmental Service on behalf of Bernalillo County Public Works states:

This report is intended for the sole use of Bernalillo County. Services performed during this investigation may not be appropriate for other users, and any use or re-use of this document or of the findings, conclusions, or recommendations presented herein is at the sole risk of said user.

URS states on: LIMITATIONS AND EXCEPTIONS

This study was not intended to be a definitive investigation of any potential contamination, which may exist at the subject property. Given that the scope of services for this investigation was limited, and given that no exploratory soil borings, soil or groundwater sampling, or laboratory analyses of soils, water, air or other media were performed, currently unrecognized contamination may exist on the site, and the level of such potential contamination may vary across the site.

URS does not assume any liability for information that has been misrepresented to us or for items not visible, accessible, or present on the subject property during the time of the site reconnaissance. Unless otherwise specified the tasks included no collection and analysis of samples.

URS cannot warrant or guarantee that not finding indicators of hazardous materials means that hazardous materials do not exist on the subject site. There is no investigation thorough enough to preclude the presence of materials on the subject site, which presently, or in the future, may be considered hazardous. Because regulatory evaluation criteria are constantly changing, concentrations of contaminants present and considered to be acceptable may, in the future, become subject to different regulatory standards and require remediation. Opinions and judgments expressed herein are based on URS' understanding and interpretation of current regulatory standards and should not be construed as legal opinions.

Writing Point Suggestions: URS (AECOM) and Bernalillo County Public Works Department stating they do not take any liability and responsibility for what is written in the Environmental Assessment. The EA was not intended to investigate any potential contamination on the road projects. There was no sampling of soil borings, soil or ground water sampling, or laboratory analyses of soils, water, air or other media were performed. Admittedly they only did a visual inspection and web database searches. There is the potential that unrecognized contamination may exist and may vary across the sites located in the road projects Sunport Extension /Woodward Road. These sites include South Valley Superfund Site and the Schwartzman Landfill.

It is an insult to the people and the environment of San Jose and Mountain View, who have suffered from the nuclear bomb industry, oil and gas industries, metal processing for recycling, unlined waste dumping, chemical industries, and many others that have left a legacy of toxic pollution on the land, air and groundwater--all because an entirely Hispanic community of poor working people cannot afford legal fees to make companies clean up their environmental wastes. For the Federal Highway Administration to assure that environmental justice is properly and adequately considered in the Sunport Extension road projects the FHWA should require URS (AECOM) and Bernalillo County Public Work to do a full-scale Environmental Impact Study or give the Sunport Extension a "No Build Alternative".

Traffic: The EA states the purpose and need for the Sunport Extension is to balance traffic Volumes and Congestion Relief. Better balance traffic volumes on the roadway network by providing another connection from the existing arterial system (Broadway Boulevard and Second Street) to I-25.
Writing Point Suggestions:

- The Sunport Extension is not being designed for the stated purpose and need to balance traffic volumes, improve circulation, and congestion relief. It is designed to only increase traffic on Broadway Blvd (south), Woodward Road and Second Street south to Rio Bravo. Decrease traffic to the Downtown Albuquerque central business district.
- Over ten thousand vehicles traveling every day on Woodward Road (south side of the community of San Jose). Will create adverse direct effects, such as noise and vehicle emissions for the families living in San Jose. Traffic noise that will disrupt a child ability to sleep and concentrate, which may affect a child's acquisition of speech, language, and language-related skills, such as reading and listening interfere with speech and language. On adults and elderly, the traffic noise may cause hypertension, heart disease, and sleep disturbance.

• The increase of chemical pollution from vehicle emissions along with the idling trains and chemical smells that come from the polluting industries in San Jose will exacerbate the breathing in of air pollutants and put children and families of San Jose at a higher risk for asthma and other respiratory diseases.

• The additional ten thousand or more vehicles traveling from the Sunport Extension east and west on Woodward Road, will make it impossible for the families to merge from William Street on to Woodward Road; which is one of the three only entrances and exits the community of San Jose neighborhood has. An exit and entrance (William Street and Woodward Road) the community of San Jose has had accessed for over seventy-five years.

• The additional auto emissions from over ten thousand vehicles along with idling trains in the community of San Jose will increase the community's cumulative impacts of air toxics such as benzene, PM10 and PM 2.5.

• The multi-modal bike and pedestrian lanes are dangerous. Who will ride a bicycle or take a baby carriage up the Sunport Extension next to big semi-trucks traveling at 45 miles per hour and other traffic speeding to pass a semi-truck at 60 miles per hour. The Sunport Extension is unsafe for multi-modal use.

• The Sunport Extension bike lanes (one in each direction) will be extremely dangerous to bicyclists riding a bicycle along the side of a semi truck traveling at speeds of 45 MPH.

• Drivers traveling west on Woodward Road will become frustrated when the trains are completing a track switching operation; impatient and frustrated drivers trying to avoid lengthy delays from the freight train switching operations will speed through the neighborhood of San Jose trying to find an exit to get back onto Broadway Blvd. Putting the children and families living on William St, Bethel Ave and San Jose Ave in harms way.

• Big semi-trucks and tanker trucks are going to have difficulty making their way up a grade 7 hill (Sunport Extension), then queue up and turn onto the northbound I-25 ramp. When the exiting airport traffic is fast and unyielding, especially for a big semi-truck.

The Environmental Assessment states traffic vehicles will increase on 2nd street and Rio Bravo.
Writing Point Suggestions: Bernalillo County has not addressed what they are going to put in place to protect and keep the children and families on Quetzal Drive and Poco Loco Drive safe from adverse direct effects of vehicles speeding through their neighborhood. When traffic on 2nd Street is backed up waiting to turn right on Rio Bravo. Frustrated drivers will drive on the dirt shoulder of 2nd St then turn right onto Rossmoor Dr and Cameo Dr cutting through the neighborhood as fast as they can to get to Rio Bravo, then other frustrated drivers will follow repeating the same pattern. This is already happening today.

The EA states the purpose and need for the Sunport Extension is Improved Access and Circulation. Improve access to economic centers and related commercial and industrial development through a more direct roadway link from Albuquerque International Sunport (Sunport) and I-25 to Broadway Boulevard and Second Street.
Writing Point Suggestions: In 2017, the community members of San Jose and Mountain View had to request and attend 6 Public Information Hearings on polluting industries for numerous hot mix and recycle asphalts plants, a Concrete Crushing Demolition Companyand a Chemical Terminal Company applying for air quality permits. All six air permits where approved. On August 30, 2018 community members of Mountain View and San Jose will be attending a second Public Information Hearing for 2018 regarding another polluting industry applying for an Air Quality Construction Permit (New Mexico Terminal Services) to build another hot mix asphalt facility in the community of Mountain View. With all the new hot mix asphalt facilities and existing hot mix and recycling asphalt facilities that have already been approved for air permits in 2017/2018. The community of Mountain View is becoming the corridor for hot mix and recycling asphalt facilities for the Unincorporated Bernalillo County, City of Albuquerque and the State of New Mexico.

• The proposed Sunport Extension roadway WILL NOT bring economic centers, hotels or restaurants to build near Broadway Blvd (south), Rio Bravo Blvd. and 2nd Street. The land the County would like to see developed is cheap to purchase and zoned M-2 & SU-2 for Heavy Industries. It will attract and encourage more polluting industries to locate and build their facilities in the communities of San Jose and Mountain View.

• Albuquerque Asphalt owner told the community of Mountain View and San Jose at the Public Information Hearing/Round Table held on April 26, 2018 that Commissioner Quezada assisted them (Albuquerque Asphalt) in finding a location to build a Portable Hot Mix Asphalt facility in Mountain View as long as they did not build across from the school. Albuquerque Asphalt is planning to built across the street on Broadway (east side) a distance away from Mountain View Elementary School.

• Commissioner Quezada failed to see across the street from the Mountain View Elementary School the existing Black Rock Asphalt facility, the proposed building of Mountain States Constructors (Hot Mix Asphalt Plant) and Albuquerque Asphalt planning to build their Hot Mix Asphalt Plant are all within a mile range east from the Mountain View Elementary School.

• If San Jose and Mountain View were to have filed an appeal on any of the 7 approved air permits, according to the City of ABQ/Bernalillo County Air Quality Control Board Adjudicatory Guidebook. The only way the hearing Officer for Air Quality Control Board will accept the community's research, technical or scientific data is through an attorney, toxicologist or scientist.

• We should ask if Roger Paul from the Public Works Department's budget and if Commissioner Quezada from his discretionary funds are going to put money aside for the community of Mountain View and San Jose to hire attorneys, toxicologists or scientists to challenge all the new air permits that will be approved from the new polluting industries the Sunport Extension is going to attract.

• People traveling through the Sunport Extension to Woodward and 2nd Street will see twoBulk Gasoline Terminals and four Concrete Crushing Demolition Companies will get the impression the Sunport Extension is the major arterial for polluting industries in the Unincorporated Bernalillo County.

• People will only see the mountains of boulders and broken concrete stacked so high, you no longer can see the beautiful cottonwood trees in the Bosque and the view of the mountains.

• For Bernalillo County to attract US Foods and Admiral Beverage into the area the County had to give US Foods and Admiral Beverage personal Property Tax Exemptions and Industrial Revenue Bonds and the families of San Jose living on Broadway Blvd. (North), Wesmeco Dr and Arno St who pay property taxes do not have storm drainage and sidewalks.

• From the 2900 Block of William Street to Woodward Rd the community of San Jose does not have sidewalks to walk to the proposed Woodward Road Improvements. The County Public Works Deputy Manager Roger Paul said at the July 19, 2018 Public Hearing: "Woodward Road is a city street and the city may have other plans for it beyond this project. None that they know of, there will be no road reconstruction between 2nd, Woodward, Broadway and I-25 there will be no bike lanes, no sidewalks and no improvements. These could be done potentially if another project was setup, without this project improvements will not happen."

• Ask Roger Paul, what happens to the General Obligation Bond funding tax payers approved for the Woodward Road Reconstruction? How can Bernalillo County Public Works take away the money from General Obligation Bond voters approved for the Woodward Road Reconstruction?

• Request the County and Bernalillo County Public Works to be transparent with the public and disclose within thirty days (after July 31, 2018 on the Sunport Extension project website) a complete breakdown of all the funding sources and allocations that has been secured for the Sunport Extension, Woodward Road and 2nd Street Improvement Reconstruction.

The EA states Bernalillo County has land use regulations to review and control development. The County is preparing, has prepared a developing mechanism in the draft San Jose/Mountain View Design Overlay standards to guide the growth of future commercial and industrial development in the Project area. A draft Design Overlay (San Jose/Mountain View) Bernalillo County stated in the 2015 EA "Bernalillo County is addressing land use issues in the Mountain View and San Jose communities and has prepared the draft San Jose/Mountain View Design Overlay plan to "positively influence development patterns in an effort to shape and enhance the character and identity of Upper Mountain View." "The County has prepared the San Jose/Mountain View Design Overlay plan which, when adopted (anticipated in late 2015), could mitigate impacts from future new development."

Writing Point Suggestions:

• In the three years Bernalillo County has made the above statement in the 2015 and 2018 EA. No known community members of San Jose and Mountain View has seen or read the draft San Jose/Mountain View Design Overlay.

• A Design Overlay (San Jose/Mountain View) that will probably only be a checklist for the undesirable business to know how to build a parking lot, address off-street parking, signage, landscaping, fencing and walls, lighting and setbacks.

• The draft San Jose/Mountain View Design Overlay will not change the zoning codes needed to protect the quality of lives of families living in San Jose and Mountain View.

• The community members of San Jose and Mountain View believe the draft San Jose/Mountain View Design Overlay that is being prepared or that is already prepared by Bernalillo County Public Works will not be approved by the Bernalillo County Commission. In the past twelve years the County Commissioners have not officially adopted or approved the draft Mountain View Sector Development Plan, then why will the County Commissioners officially adopt or approve the draft San Jose/Mountain View Design Overlay.

Public Involvement Meetings: Ecosphere's letter addressed to Agency Representative or Interested Party on April 20, 2018 mentions, "citizen involvement, as mandated by FHWA and NMDOT procedures, was accomplished through individual contact, correspondence, and meetings. During the past eight years, five public meetings and numerous agency and stakeholder consultations have taken place, and additional public involvement and agency coordination are ongoing. The NEPA process requires coordination with pertinent agencies and interested parties.

Writing Point Suggestions:

Ecosphere's Senior Project Manager letter John Taschek dated April 20, 2018 on the EA is an insult to the community members of San Jose & Mountain View who will receive the greatest potential adverse impacts of the road project--noise, dust, traffic, interference with existing superfund monitoring and remediation systems for groundwater. The area we live in was polluted by G.E., Chevron, the American Car and Foundry (during the making of an atomic bomb), the Atchison, Topeka and Santa Fe Rail Road's creosote facility, UNIVAR who makes all kinds of hazardous chemicals (some of which are explosive), and other heavy industries that pollute the ground, air and the water in San Jose and Mountain View.

Mr. Taschek saying public involvement had been attained as part of the project. Is not true, the public advertised meetings held by URS and Bernalillo County Public Works did not give the community members of San Jose, Mountain View and the public the opportunity to make comments or ask questions. The community and public were told after the PowerPoint presentations, "there would be no questions or comments out loud, questions or comments would be addressed at the stations on a post it note or on an easel pad.

The public was denied an opportunity to ask questions or make comments out loud. Is a violation of our basic rights as human beings to be treated with fairness and decency and respect.

The community of San Jose and Mountain View are economically disadvantaged communities comprised of mostly Hispanic people, it even says so in the EA prepared for the project. URS, Ecosphere Environmental Services and Bernalillo County Public Works admit they did not take any sampling of soil borings, soil or ground water sampling, or laboratory analyses of soils, water, air around the Schwartzman and Demolition Debris Landfills. South Valley Superfund Site and rights-of-way along Woodward Road and 2nd St. admit they only did a visual inspection and web database search.

The FHWA needs to give the Sunport Extension a "No Build Alternative" or make the decision for an Environmental Impact Study to be completed to thoroughly and truthfully examine all the negative impacts the Sunport Extension will have on the families of San Jose and Mountain View for many decades.

The City of Albuquerque No Longer Supports the Sunport Extension Project

On May 1, 2018, Mayor Tim Keller publicly stated that the City of Albuquerque was withdrawing its support

for the Sunport Blvd Extension Project. The project, including the Woodward Road Improvements, is almost entirely on City property so there is a serious question as to why the County is doing continuing to pursue this project.

Robert Nelson | robert.nelson.abq@gmail.com

Woodward Road Improvements
Environmental Assessment
Bernalillo County Project No. TS 09-06
NMDOT Project No. CN A300160 & A300161

July 19, 2018

Please submit your comments by July 31, 2018.

We don't really see a necessity for Woodward to be changed. It will create more congestion and traffic, especially big semi trucks and such.

Manuel Candelaria

Mail To:
AECOM
Attn: Peter Hinckley
6501 Americas Pkwy. NE/ Suite 900
Albuquerque, NM 87110
(505) 855-7409 or fax (505) 855-7555
E-mail to: Peter.Hinckley@aecom.com

Your Name: Manuel Candelaria
Address: 207 Abajo Rd SE
Albuquerque, NM 87102
Phone: 505-843-7638
E-mail:

Bernal
NMDOT Project No.

July 19, 2018

Please submit your comments by July 31, 2018.

We've lived here since 1970; all my four kids were raised here. For the forty years I've lived here I haven't seen improvement. We have concrete waste porta potty storage and second street is a mess.

Improvements and Signal extension

I disagree with the Woodward Rd extension because it will add more pollution and more contamination of the environment. And we have enough.

Rita Candelaria

Your Name: Rita Candelaria
Address: 707 Abajo Rd SE
Albuquerque NM 87102
Phone: 505-843-7638
E-mail:

Mail To:
AECOM
Attn: Peter Hinckley
6501 Americas Pkwy. NE/ Suite 900
Albuquerque, NM 87110
(505) 855-7409 or fax (505) 855-7555
E-mail to: Peter.Hinckley@aecom.com

Johnson, Alexandria

From: Hinckley, Peter
Sent: Monday, July 30, 2018 12:55 PM
To: Johnson, Alexandria
Cc: Rodrigo Eichwald Rodrigo L Eichwald (rleichwald@bernco.gov)
Subject: FW: Sunport Extension

Alex

Please file

Peter C. Hinckley, PE
Principal Engineer, Transportation, Rocky Mountain Area
D 505-855-7409 C 505-948-4090
Peter.hinckley@aecom.com

AECOM Technology
Rocky Mountain Area
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www.aecom.com

From: SBMTNA [mailto:sbmartineztown@gmail.com]
Sent: Monday, July 30, 2018 12:51 PM
To: Hinckley, Peter; jtaschek@ecosphere-services.com
Cc: liliancrunk@hotmail.com; Jesse Lopez Member; rosalimartinez06@gmail.com; Angela Vigil Member; Christina Dauber; gilsman1@msn.com; dznaranjo11@gmail.com
Subject: Sunport Extension

RE: Sunport Blvd Extension/ Woodward Road Improvements
April 2018 Environmental Assessment
Control Numbers: A300160 and A300161
Via email to:
Peter Hinckley peter.hinckley@aecom.com
John Taschek jtaschek@ecosphere-services.com

Dear Mr. Hinckley,

It is easy to write down on paper the Bernalillo County has land use controls, when dealing with adverse companies that will pollute your neighborhood. I have helped our sister neighborhood of San Jose when they need assistance in challenging special use permits, or air permits. The County Planning Commission normally has meetings scheduled during business hours. So, the residents have to miss work to attend. The air permit meetings are usually held in the evening and it is normally a two-hour meeting. The results are usually the same with the applicant gaining approval with very few restrictions.

This is what usually takes place when an applicant is seeking a special use permit. The applicant views the land and negotiates with the land owner's representative to see if a land use permit can be obtained before the land is purchased. Then an application is presented to a Bernalillo County Community Development Manager. If it is determined a special use permit is needed the additional forms are completed and fees paid. The applicant has to post zone change request sign on the property and must notify neighborhood associations of the special use

request, is encouraged to meet with the neighborhood associations.

Once the application is completed and provisionally approved a hearing is scheduled with the County Planning Commission. Then the representatives of the neighborhood have to schedule time off of work and attend the hearing. The day of the hearing, the applicant and applicants' attorneys see a large community presence a deferral is requested, and the hearing is rescheduled for another day. The cycle is continued until the hearing day the applicant feels there is weak opposition. Then the special use permit is approved. The community may appeal the decision to the County Commission which usually rules in favor of the applicant.

The air permitting application process is similar to requesting a special use permit, except only if there is significant interest the Director of Environmental Health Department will schedule a Public Information Hearing. At the Public Information Hearing both sides are allowed to present testimony and these hearing are passionate and lively. Then the Environmental Health Department meets behind the scenes with a couple of Air Quality Division staff members to approve the air quality permit. If the community has an attorney, they may appeal on the merits of the case to the Albuquerque/Bernalillo County Air Quality Control Board the appeal may take years for the hearing to happen.

All of the laws, regulations and guidelines are written to protect the applicant and the neighborhood has to prove the new company will be injurious to the community. Everyone has a definition of injurious and hearing officer thinks injurious is imminent harm, while the community is looking at the harm that occurs 5, 10 and even 15 years later. The Sunport Extension will be injurious on the first day it is opened because of the steep grade. Someone will drive down the hill faster than they should and will misjudge the traffic lights and a bad accident will happen right on the corner of Woodward and Broadway. The San Jose neighborhood is saying the freeway extension is unneeded and unwanted, yet the County is choosing to force this on the neighborhood. This community knows exactly what it feels like to have an unwanted project forced on them. It is a shameful day when the New Mexico Department of Transportation and Federal Highway Administration join the County and impose another project on the San Jose and Mountain View neighborhoods.

Respectfully,

Loretta Naranjo-Lopez, President

Santa Barbara Martineztown Neighborhood Association

(505)270-7716

Hinckley, Peter

From: ESTHER KOTTKE <rekhilo@hawaiiantel.net>
Sent: Monday, July 30, 2018 7:24 PM
To: Hinckley, Peter
Subject: Opposition to NMDOT Project No. CN A300160 & A300161

As a citizen residing at 211 Abajo Road SE, Albuquerque, New Mexico, I and my neighbors would receive direct impact of the pollution that would result from the proposed industrial and transportation involved in the “Build it and They Will Come” Woodward modification from the Sunport Extension bringing the Freeway into our streets and property. The notion that this expansion of Woodward and broadening of the roadways toward Second Street, allowing more building materials distribution, roadway products, waste redemption, and other base industrial products would enhance the employment possibilities and result in the cleansing of the environmental problems in our area is ridiculous and foolhardy. This area is already supposed to be an "Environmental Justice” area, to be cleansed of air and water pollution entities currently present. First of all, isn’t this a bit of the “cart before the horse” theme - telling the citizens they will get improved pollution control by approving this “pollution producing” road expansion before completing the supposed Superfund clean-up activities already plaguing the area. The folks in the area fought for some Superfund action, and now the government wants to allow pollution producing industry to expand further into our neighborhoods. Maybe it’s because this is a lower income area that government and industry thinks they can run over the citizens, but this isn’t over yet and there will be more and more opposition. The area citizens cannot be convinced that there will suddenly be Malls and/or stores and/or clean industry in an area that has already become a road materials, industry waste, and base industrial production area - we live here and we see the reality.

Ray Kottke
211 Abajo Rd. SE
Albuquerque,NM 87102
505-440-5786
rekhilo@hawaiiantel.net

New Mexico
Environmental Law Center
TM

July 30, 2018

Mr. Peter Hinckley, URS/AECOM,
6501 Americas Parkway NE, #900
Albuquerque, NM 87110
By email to: peter.hinckley@aecom.com

RE: Critical Comments of SouthWest Organizing Project [SWOP] and Esther and Steven Abeyta on the Bernalillo County-URS/AECOM ["BernCo/AECOM"] Sunport Extension Project Revised Environmental Assessment ["REA"] and Human Impact Partners ["HIP"]

Dear Mr. Hinckley:

New Mexico Environmental Law Center (Jon Block, Staff Attorney) hereby submits the following critical comments on the Sunport Extension/Woodward Road Improvement project EA on behalf of the SouthWest Organizing Project ["SWOP"] and two representative members of the organization, Esther and Steven Abeyta, who are residents of the San Jose community--a community adjacent to the project that would receive potential project impacts.

We incorporate by reference from our previous comments which are attached hereto in Appendix A to the following comments the descriptions of SWOP and Esther and Steven Abeyta. We also not that Appendix A also contains a comment letter from HIP that is also incorporated into the following comments. We have emailed this comment to you today and placed in the mail, U.S. Postal Service Priority Mail, a black and white paper copy.

Thank you for consideration of the comments and those in the Appendix that were never responded to when filed in relation to the 2015 EA.

Sincerely,

Jonathan M. Block
Staff Attorney

cc: Juan Reynosa, SWOP; Esther and Steven Abeyta.

I. INTRODUCTION AND PRELIMINARY COMMENTS SUBMITTED ON BEHALF OF SWOP AND ESTHER AND STEVEN ABEYTA.

A. General Failings of the 2018 "EA" and NEPA Process in This Case.

1. The April 2018 Environment Assessment ("2018 alleged EA") is, in fact, not a stand-alone Environmental Assessment prepared in accordance with the National Environmental Policy Act ("NEPA") requirements and the regulations of the Federal Highway Administration ("FHWA"). It is instead the document merely combines the previous 2015 EA for Sunport Extension Project and the proposal (Technical Study (2014) cited in 2018 alleged EA, § 2.1.1, at 5) to make improvements to Woodward Road ("Woodward" or "Woodward corridor").

2. Plainly, the Technical Study regarding Woodward was *not* an Environmental Assessment. Rather, it was a Bernalillo County study prepared to support the County's ("County" or "Lead agency" or "BernCo") contention that the Woodward improvements qualified as a "categorical exclusion" ("CE") from the FHWA requirement to conduct an EA on such a project. Significantly, for an examination of the 2018 alleged EA, the FHWA rejected that contention. Mr. Gregory Heitmann, FHWA, letter to Mr. Tom Church, NMDOT (July 21, 2016) (a copy of the letter is in Appendix 'A' to these comments attached hereto).

3. In the letter, the FHWA suggested that one option for BernCo, if it wanted to pursue the project, would be combining the Woodward CE with the Sunport Extension EA as "a single EA." The County has not, in fact, done this. Rather, BernCo has merely repackaged the two documents without any significant additional study or

analysis – and, most notable, without ever replying to the extensive comments the New Mexico Environmental Law Center ("NMELC") submitted on behalf of SouthWest Organizing Project ("SWOP") and San Jose neighborhood residents, Esther and Steven Abeyta. Jonathan Block, Staff Attorney, New Mexico Environmental Law Center, comments conveyed by letter to Peter Hinkley, AECOM (September 21, 2015) ("NMELC Comments"), in Appendix A, attached hereto. The 2015 NMELC Comments included a Human Impact Partners ("HIP") study and analysis of the proposed project. Significantly, although BernCo/AECOM sent one of the co-authors, Sara Satinsky, an invitation to attend the July 19, 2018 public meeting on the 2018 alleged EA on July 16· 2018 (less than three days until the meeting), BernCo/AECOM has also yet to respond to the HIP comments – a matter addressed in the letter from HIP which is attached at the end of these comments.

4. It is also important to note the lapses in the NEPA process in this latest version of the BernCo/AECOM "Environmental Assessment" in relation to the public. As noted above, no response was made to comments from the last EA, major commenters (obviously interested persons such as HIP) were not invited to the public meeting until less than three days prior to the meeting, the BernCo website (as visited on 7/30/2018 to confirm this) had no new scheduled posted to the website showing a public hearing and comment period—the new schedule just shows plans moving forward to "Build." The new "EA" was not available to the public until near the end of June. The Air Quality assessment in relation to the project was not available to the public until a few days prior to the public meeting and is not properly a part of the published "EA". All

of these acts form a continuous stream of failures to conduct a proper NEPA process. One other noticeable failing in the current "EA" is that most of the letters to agencies (state and federal) that should be cooperating in the process—the very core of what NEPA is intended to do—did not respond to the letters send out for this EA. There was no documented follow up either by the company conducting the "EA" or BernCo/AECOM. This failure undermines a key aspect of the process: getting all of the various state, federal and local agency expertise relative to the project at issue to weigh in on the environmental issues within their respective bailiwicks.

5. The FWHA's letter also required the County to present "a single EA at a public hearing." Although a public meeting was held on July 19, 2018, the County failed to address any of the comments NMELC and HIP previously submitted, and did not present any new analysis that was done in support of a single EA. In fact, a new, single EA has yet to be prepared. When or if it is prepared; another hearing, which fully examines the issues raised here, should be held—at which the public allowed to question the presenters. Note also, that what BernCo/AECOM styled as a "public hearing" was, in fact, merely a comment opportunity, as BernCo/AECOM did not allow anyone participating to question any of the presenters. BernCo/AECOM had prepared an hour-long presentation – but gave all of the other interested members of the public who came to the meeting only five minutes each.

6. What BernCo/AECOM hold out as new EA (dated April 2018) does demonstrate a few things. First and foremost, it shows that the proposed project has no real transportation purpose. Second, it demonstrates there is no need for the project.

Third, is reveals that, in the absence of a purpose or need, the alternative analysis is meritless (which should have resulted in BernCo/AECOM selecting the "no build" alternative). Fourth, it makes quite clear that even if a purpose and need could be found, the (alleged) EA utterly fails to establish that the preferred alternative is acceptable in light of the known and unknown adverse environmental consequences. For those reasons we will refer to the document as the "2018 alleged EA" throughout these comments, as it resembles a proper NEPA Environmental Assessment in name only.

The following comments concern other inadequacies in the 2018 alleged EA highlight some of the issues that are taken up in greater detail in sections that follow.

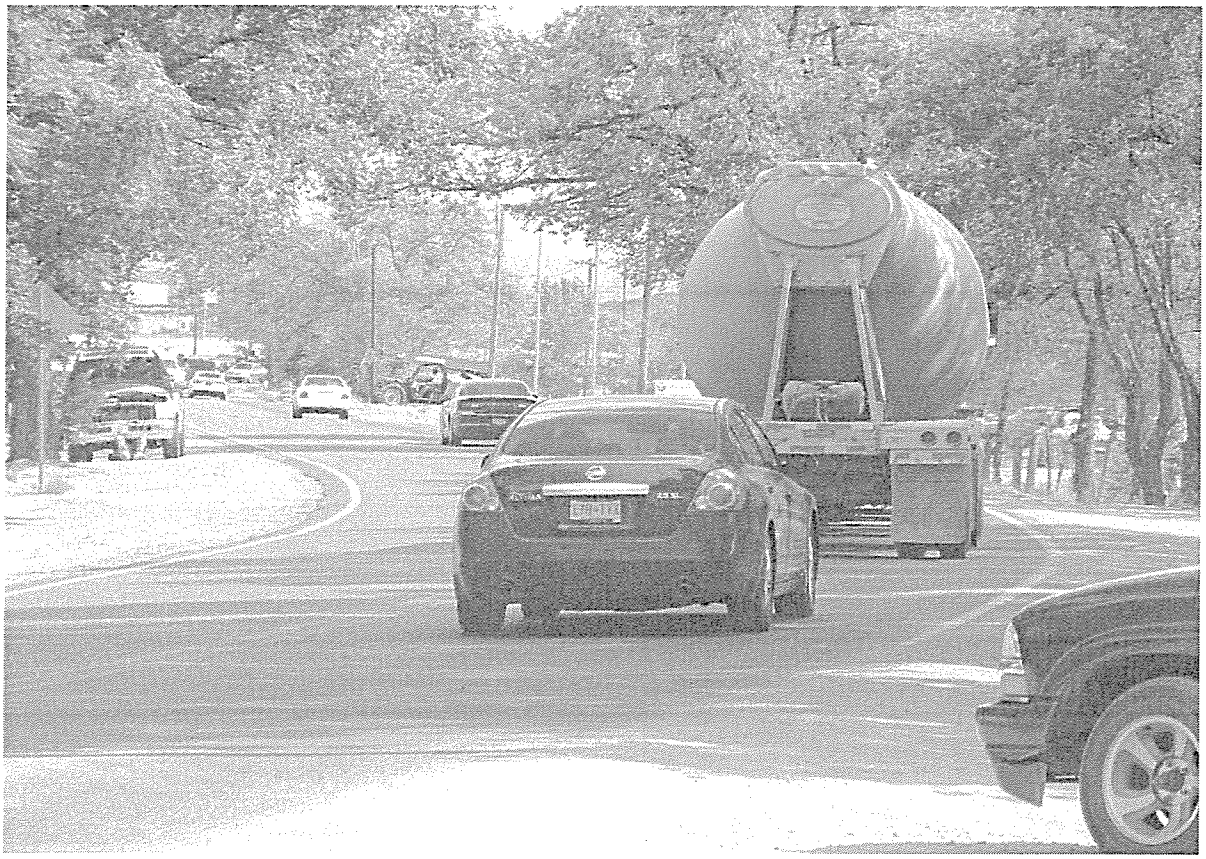
B. No Demonstrated Need for the Project.

1. In general, the 2018 alleged EA's discussion of the need for the combined project (Sunport Extension plus Woodward Road Improvements) is very thin as the comments below make clear. If the road is not needed and has no logical terminus, why spend a millions of dollars to dig into a contaminated area when the City and the community do not want it? The EA fails to properly evaluate traffic congestion, the need for new access, and the economic rationale for "Build" (as opposed to "No Build"). The **2018 alleged EA does not**: demonstrate or document an access issue, justify its economic benefit claims, show why this road is needed in the face of projected continued population declines in the Albuquerque area through 2040, deal with foreseeable, direct and indirect and/or cumulative impacts, or use scientific research materials that are current and, where relevant, take into account the effects of climate change. All of these

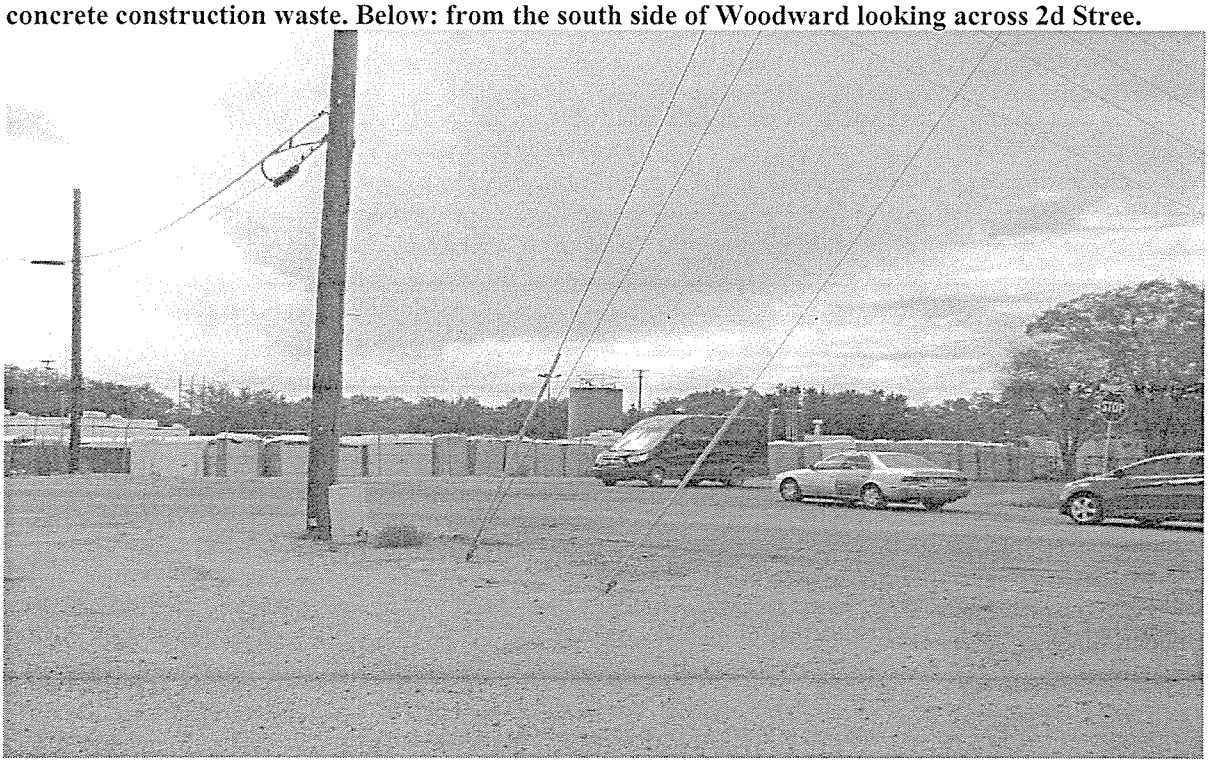
deficiencies in the 2018 alleged EA – and more -- are expended upon in the comments below.

2. The EA does not provide an evaluation of whether traffic/congestion is currently problematic or is expected to be problematic in the no-build alternative. There is a mention that the Project will reroute traffic so that traffic/congestion will generally decrease north of the extension as vehicles reroute. There is no mention in the EA of whether traffic levels were projected to be a problem in the "No Build: alternative. The EA fails to analyze for the build and no build alternatives whether there will be congestion. This needs to be done using accepted evaluative criteria such as LOS or vehicle delay or something similar. A proper analysis should use signalized intersection level of service (LOS), that is, the average total vehicle delay of all movements through an intersection stated in terms of average delay per vehicle during a specified time period (e.g. the "PM" or peak hour). This needs to be done on 2d Street as that is the illogical terminus of the project – also at the Broadway intersection. However, the same methodology should be used to evaluate all of the areas that the EA mentions as having potential traffic impacts (either increasing or decreasing).

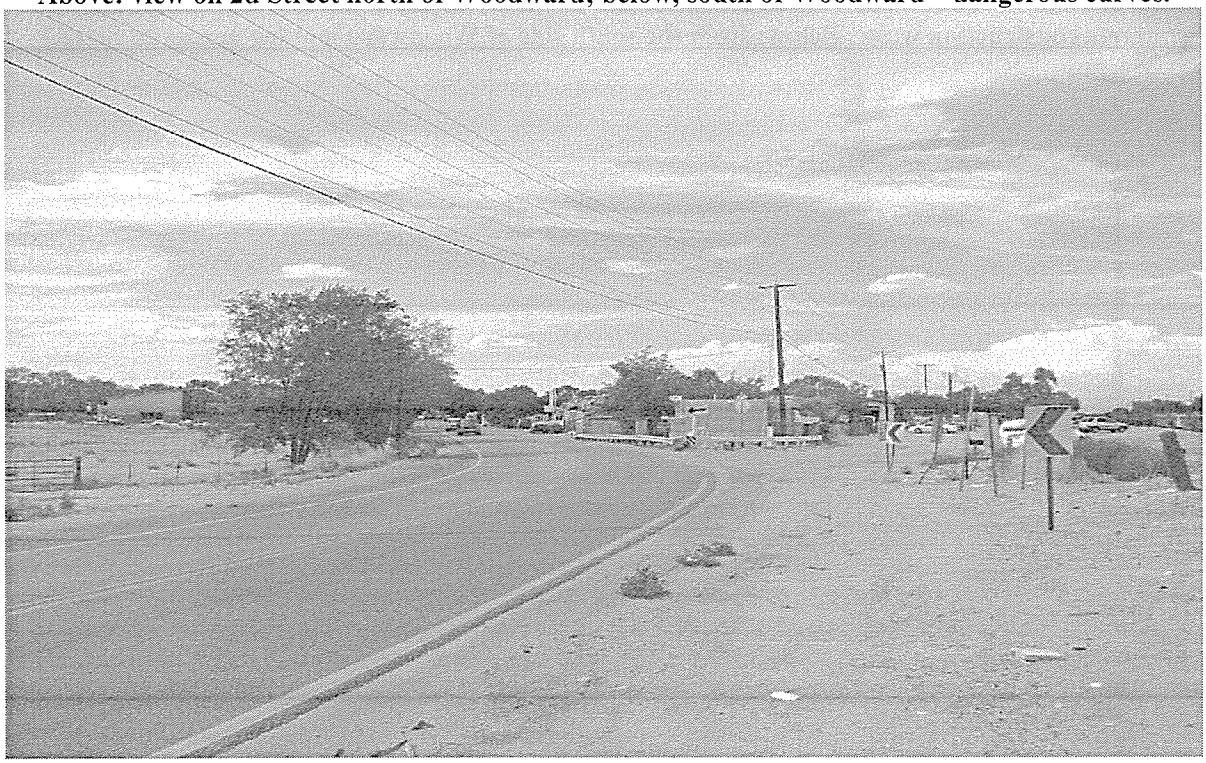
Looking north on 2d at the Woodward Road intersection



Above: looking south from Woodward from the driveway of the company that has a large pile of concrete construction waste. Below: from the south side of Woodward looking across 2d Stree.



Above: view on 2d Street north of Woodward; below, south of Woodward – dangerous curves.



Significantly, commenters at the public meeting on July 19, 2019 raised the issue of problems with traffic on 2d Street. They mentioned that congestion at Rossmore and 2d caused drivers in a hurry (and often speeding) to cut through the residential neighborhood in order to bypass Rio Bravo and 2d. Approval of the "Build" alternative will bring more traffic through this neighborhood as 2d Street is already congested with rush-hour traffic.

3. There is no description in the EA of the existence of an access problem that has been demonstrated using travel time or accessibility measures or similar. In other words, there is no evidence in the EA that there is a need a more direct route from/to the Sunport for the area that the project will serve. Current access from San Jose or Mountain View, according to Google Maps direction program, is about 8 to 10 minutes. That might change slightly with a more direct connection, but the EA does not evaluate the magnitude of change. If that change were evaluated, would it be large enough to justify the expense of building this project and the burden of this project on the San Jose and Mountain View area communities?

4. The discussion of economic growth that this project allegedly will bring to the area is rather thin and likely too optimistic. The calculator used in the EA to estimate the economic benefits does not account for the fact that there is already highway access to this area (albeit slightly less directly to/from one destination: the Sunport). Thus, the project's impact on access may be lower than a generic new connector, and therefore its economic benefits would also be less.

5. The EA does not make clear that industry will be allowed to locate here. The EA discusses how the community is concerned about growth in heavy industry and that there may be some upcoming changes (e.g., the Design Overlay standards discussed elsewhere) to address that concern. There is, therefore, an open question as to what the area will look like (especially if the County is likely to restrict heavy industrial uses). This undercuts the rational for the "Build" alternative, as there is no reason not to hold off on this project while a decision is made about how the area will look. It makes no sense building a very expensive short length of road that may be completely incompatible with the future vision and needs for the area.

6. The EA does not make clear if the estimated economic benefits are to the entire region, or just to the corridor in the project. In other words, there is no documentation of a demand to create new businesses in the Albuquerque region being so constrained by the lack of vacant industrial land that this connector will bring new growth for the region (that would not locate elsewhere in the region if the "No Build" option is selected).

7. The "No Build" alternative does not provide bike/pedestrian infrastructure, yet that is also mentioned in the EA as a need in the affected area. Yet, the EA does not consider a bike/pedestrian *only* alternative. The reason must be that the need for congestion relief and the potential economic benefits of it have not been demonstrated in the EA.

8. The discussion of the potential risks due to construction in contaminated areas seems thin. Appendix E discusses some of the history of

contaminated sites and their characteristics in more detail, but there is no narrative in the EA about the potential health risks or pathways. Some of the discussion in Appendix E also seems thin. For example, where (in relation to the ROW) is the contaminated soil in the several sites that seem to contain contaminated soil (some of which are considered RECs in the EA and some of which aren't)? While it may not pose a risk when it is intact under the surface and not in contact with groundwater or air or kids eating dirt, it may pose a health risk once you dig into it and expose it, so it seems important to know where it is in relation to the ROW.

9. In general, the EA's evaluation of impacts is pretty vague throughout and does not meet the FHWA and NEPA standards for a properly conducted EA. For example, there is a dearth of information about the risks from digging into hazardous waste and other contamination (as noted above). There are no maps of traffic changes. There is no description of why additional noise impacts are not important. Similarly, as demonstrated *infra* at § II.A, given that the project would open a direct route to the Sunport, and a very large amount of property on Woodward Road is owned by an operating airport parking company on the East side of I-25, the failure to evaluate the potential impacts of a highly probable new parking area is a serious flaw in the 2018 alleged EA. A lot comprised of two sections with a potential 43+ total acres that will operate 24/7 year-round with stadium lighting on high poles or towers bringing intense night time high-intensity light pollution, a calculable potential number of vehicles entering and exiting, jitneys or busses as well as automobiles, bringing additional vehicle pollution (idling and staring-up vehicles) and noise – should have been part of the EA's

evaluation of foreseeable impacts on the human environment. A major issue of large parking lots is storm water run-off. Such run-off needs to be taken into account, as it contains petroleum products and heavy metals that should not be deposited in the Rio Grande. Again, the EA's failure to look at this issue in relation to the highly likely development path for the Woodward Road in the "Build Alternative" is a fatal omission.

10. The EA discussions of indirect and cumulative impacts reads like a list of all the things that should be evaluated (but were not) with merely a statement of assurance that there will not be impacts. The EA should have an actual discussion of how impacts were evaluated and what was found. The discussion of the lack of Environmental Justice cumulative impacts (in the context of the community complaints, the discussion of growth the project will induce, and community concerns about more heavy, polluting industry) are extremely problematic in light of the FHWA's commitment to take into account Environmental Justice and community concerns when evaluating projects such as this one. From the FHWA's website information to the public concerning its policies on implementation of the National Environmental Policy Act and Environmental Justice, it is patent that a (properly conducted) EA should inform the public about potential impacts--which the 2018 alleged EA in so many ways fails to do.

The 2018 EA in § 4.23 ("Cumulative impacts" at 56) states that there is a general trend to decreasing population in the Albuquerque area. This paragraph is a testament to the lack of need for this project, due to a declining population projected through 2040:

> The potential indirect effects of induced industrial and commercial growth have already been discussed. Growth in the Project area may also have cumulative impacts with other regional developments in terms of possible

> changes in travel and land use patterns and neighborhood character. Growth trends in the Albuquerque metropolitan area over the past 10 years have experienced a significant economic decline and stagnant population levels, including high unemployment, low job growth, low birth rates, and negative net migration (MRMPO 2017). These factors are anticipated to have a lasting impact on future growth, and strongly affect the areas surrounding the Project. The population projections anticipate 253,876 fewer people in the MRCOG counties by 2040 than was initially projected in 2012. The effects of this negative urban growth trend would likely extend to transportation improvements and land development proposals, with consequent fewer impacts (positive and negative) on all resources.

Id. Less people means a lessened need for projects such as the Sunport/Woodward Road project--unless the entire purpose is *not* a necessary road with a logical terminus. Rather, as noted elsewhere in these comments, the purpose is a thinly veiled a public works project to fix-up a dilapidated industrial area. It is significant that the EAs of the past and the present 2018 alleged EA all state that if there is a "No Build" there will be no remediation of problems in the area of the proposed project. One can read that as a threat to the local citizenry -- support this project or you will never get sidewalk, street lighting, improved drainage, medians where needed, additional signage and traffic lights. Or, one can read this as meaning that the project is intended to get the money allocated for federal highway funding to do the kind of public works one expects from local and state government.

11. The 2018 alleged EA at § 4.2.1 states less than 10 inches of rain a year and seasonality. This is a citation to a paper from 1987. That is 30 yr. old data that does not take into account climate change impacts. The EA should reference more recent studies.

12. The 2018 alleged EA at §§ 3.4.3, 4.2.2, 4.3.2.1, 4.8.2, does not appear to account for an increase in impermeable surfaces (asphalt/concrete) on their soil erosion calculations. This increases the flashiness of an already event based system, possibly making flow rates faster and more erosive.

13. The 2018 alleged EA at §§ 1.4, 4.3.2.2, Table 4-6 at 47 (Hazardous Materials), §§ 4.19.2, 4.20.2.1 (which appears to just recycle a statement from the 2015 EA), 6.0 at 60, ISA at 6-4 to 6-5, 7-5, does not address how it will handle continued remediation with monitoring of the superfund site where it has needed to relocate monitoring wells and pipes. The EA and ISA say that monitoring wells that the project has an impact upon will need to be relocated but it provides no specificity as to where and how a change in location could or would impact interpretation of collected data.

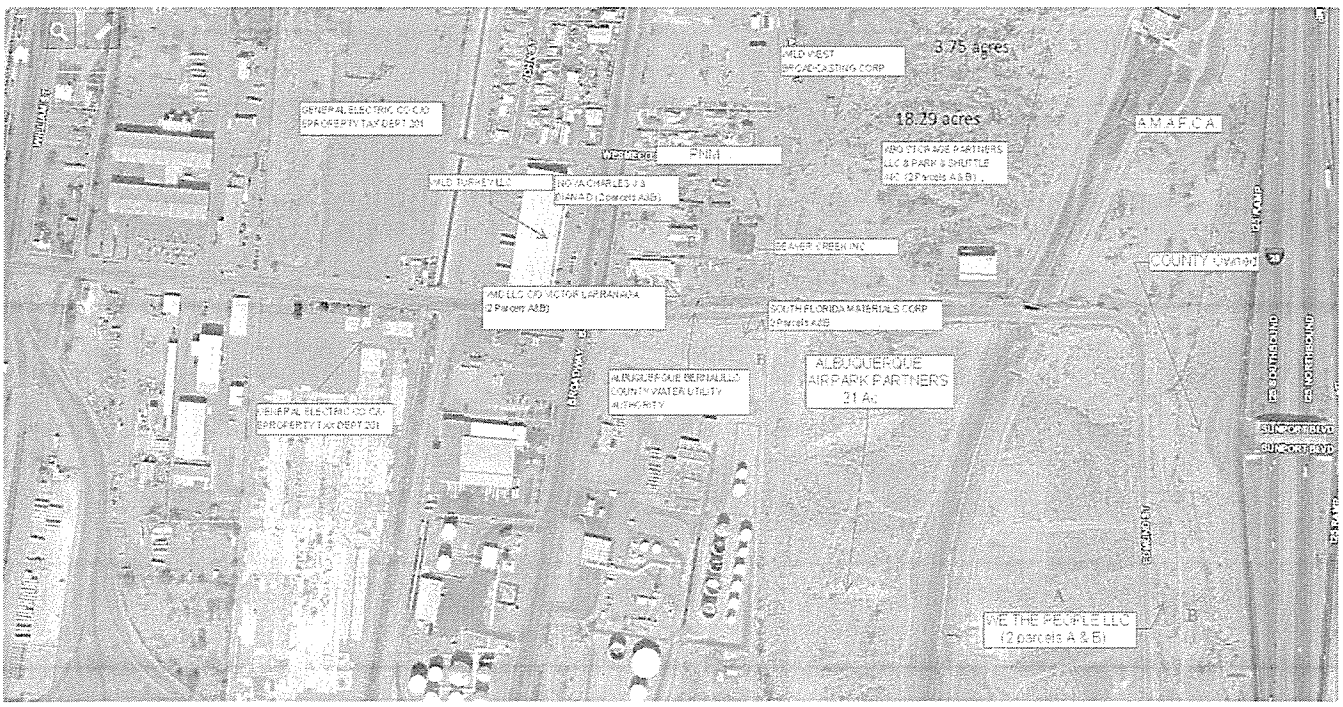
II. ADDITIONAL COMMENTS ON THE 2018 ALLEGED EA.

A. The 2018 Alleged EA Fails To Establish A Purpose Or Need For The Proposed Project.

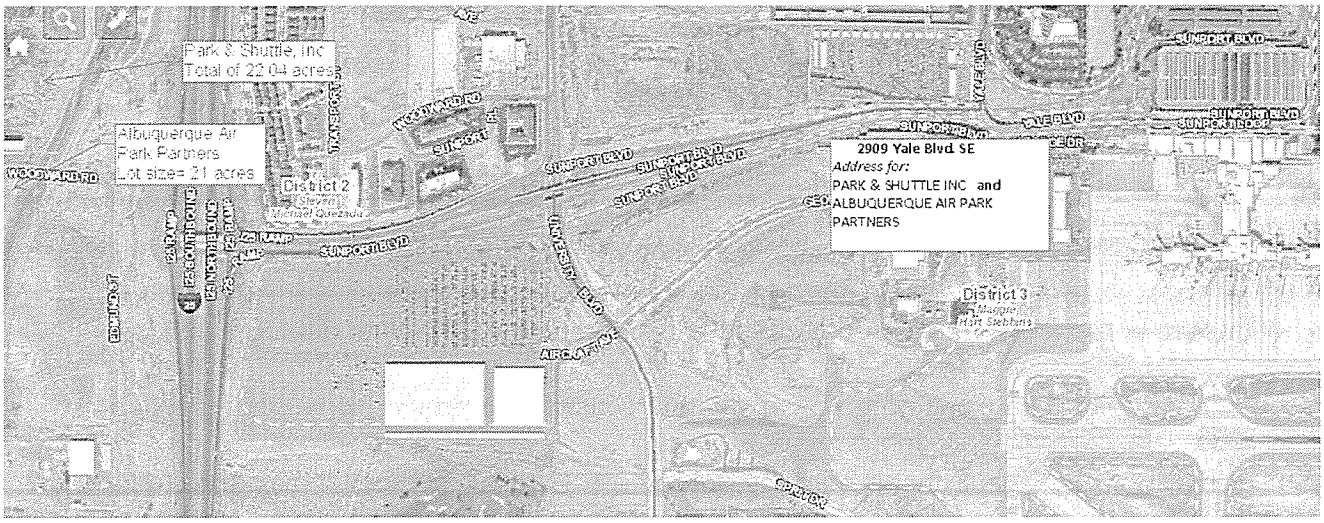
"[A]lthough significant environmental impacts are expected by the project, the purpose and need section should justify why the impacts are acceptable based on the projects importance". FWHA Guidance "The Importance of Purpose and Need in Environmental Documents" December 18, 1990 - FHWA Environmental Toolkit (Purpose Guidance Document). The 2018 alleged EA not only fails to demonstrate the importance of the proposed project but struggles to find any cogent reasons for spending 20 Million dollars to "improve road connectivity". *Id.* at 2.2.1. The proposed project is neither part of a regional or area wide transportation plan that will facilitate future

capacity, nor is it a connecting link. Instead, it "dead ends" at 2nd street, a street already overburdened and incapable of handling any increased traffic volume. Rather than creating better traffic volumes, it adds traffic to an already dangerous intersection, where there no sidewalks or drainage, marginal shoulders and dangerous curves with poor sight lines in both the North and South direction (as seen in the following photographs).

Rather than promoting new economic centers, the project, as a whole, appears to primarily benefit a Sunport parking lot owner East of I-25 who has three lots on Woodward that could be accessed via a new Sunport exit onto Broadway.



The lots Albuquerque Airport Partners and ABQ Storage Partners, LLC and Park & Shuttle own total 43.04 acres. The owners use the same business address shown below.



In addition to the failure of the 2018 alleged EA to analyze the easily foreseeable consequential environmental impacts of the project being the development of such large parking lots on Woodward, as mentioned *infra*, such massive parking lots would not meet the design standards in the proposed Overlay Plan which the County claims it will adopt to stimulate redevelopment of the area from heavy industrial to light industrial and office uses and will create a large amount of traffic, noise, and air and light pollution.

Simply drawing yellow lines on an aerial photograph (2018 alleged EA at Figure 2.1) does not create a transportation plan. The 2018 alleged EA fails to explain how these "new" traffic patterns will enhance capacity, linkage, address transportation demand, foster employment, and promote beneficial land uses, correct safety issues or correct roadway deficiencies. No evidence is provided that any of these goals-- which are necessary to establish the need for the project-- will be achieved. *See also* NMELC Comments at 4, § II.A, and at 4-5, § II.A.2. The suggestion that one of the purposes and needs of the project is to improve pedestrian and bicycle facilities and connectivity

borders on the absurd. Even if there is a need (cycling or walking to the airport?) this assertion relies on yet-to-be designed and funded pedestrian and bicycle trails along 2nd street. However, this is impossible unless and until 2nd street undergoes redevelopment. The alleged need to improve emergency access, a very weak need for a $20 million dollar project, is, nevertheless, unconvincing. Increasing traffic is some places as much as 72%will not enhance emergency vehicle access. 2018 alleged EA at Table 2.1.

The FHWA Purpose Guidance Document cited above states that, "At times it is possible that no alternative meets all aspects of the project purpose and need for the project at acceptable costs and levels of environmental impact relative to the benefits which would be derived from the project." Here, the proposed project not only fails to establish a purpose and need, but whatever needs that might be addressed by the project are, quite clearly, completely outweighed by adverse environmental impacts that would result.

B. Because There Is No Demonstrated Purpose Or Need for the Project, the Alternatives Analysis is Flawed.

In the absence of establishing a well-defined purpose and need, the evaluation of alternatives becomes an effort to find a solution where there is no problem. The 2018 alleged EA offers no transportation "solutions" but, instead, in creating a new access to the airport, confers benefits on some landowners (for parking lots and truck terminals) while imposing burdens and new hazards on the neighborhood. The FHWA Purpose Guidance Document states, "without a well-defined, well established and well justified purpose and need, it will be difficult to determine which alternatives are reasonable,

prudent, and practicable, and it may be impossible to dismiss the no built alterative." This is precisely the situation here. The project should be abandoned and the no build alternative selected.

The FHWA NEPA Implementation Guidance (November 5, 1993), "Development of Logical Termini," highlights the fundamental flaw in the proposed project's attempt to establish purpose and need. The FHWA Guidance states, "In order to insure meaningful evaluation of alternatives" a proposed project "shall have an in independent utility or independent significance, *i.e.,* be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made." The proposed project fails this test completely. Without future improvements to 2nd Street, the project is a $20 million dollar segment with no destination and no utility. It is no more than a public works project disguised as a highway project. If stimulating new land uses near the airport is the purpose and need that BernCo is seeking to address, project funding should be sought from other State of Federal programs not from the FHWA. *See also*, NMELC Comments at 9-11, § II.F.

C. The 2018 Alleged EA Fails To Demonstrate That The Project Can Proceed Without An EIS.

The existing conditions and the construction activities within the proposed project and the adjacent properties disclose the presence or highly likely presence of hazardous substances and petroleum products under conditions that pose a material threat of future release. Most of named properties along the Woodward corridor should be have been designated as having a Recommended Environmental Condition ("REC"). This is a

designation of the condition of a property involved in a proposed project that can only be properly accessed by conducting a full-scale Environmental Impact Study of the project area. Given this fact, a finding of insignificant environmental impact cannot be justified.

The Initial Site Assessment dated March 2017 (ISA) failed to address the concerns raised with regard to the prior 2015 Environmental Assessment ("2015 EA") and failed to reexamine the three RECs recommended in the 2015 EA. The technical document used as part of the proposed Woodward corridor was prepared in support of a Categorical Exclusion (CE). It is not an EA and fails to meet American Society for Testing Materials International ("ASTM") standards for a Phase I Environmental Site Assessment. This seriousness of this issue is explained as follows.

1. The EA fails to address the previous concerns raised with regard to the 2015 EA analysis of the South Valley Superfund Site, the Schwartzman landfill, the Duke City fueling site and the Chevron property.

a. South Valley Superfund Site.

No firm plans or costs projections are set forth, as was the case in the 2015 EA. Again, the 2018 alleged EA, based upon the 2017 ISA, makes vague assurances that discussions continue about how to design the project "in order to avoid and/or determine mitigation measures required for any impact of the roadway extension". ISA at 7-4. It is acknowledged that these measures will be significant, including protection and/or abandonment of wells, relocation of wells, and the lining of pipelines. ISA at 7-5. Again, as in the 2015 EA, there is no explanation of how the costs of mitigation could be calculated in the absence of any of a Preliminary Site Investigation (PSI). This is the

kind of issue an EIS would address. Thus, an EIS is required for this project before FHWA can reasonably assess the feasibility of it.

b. Duke City Refueling.

This property has a history of discharges of petroleum and five (5) fuel dispensers are within the Right of Way ("ROW"). No active release was found during the "site reconnaissance." Clearly, surface examination alone is inadequate to meet ASTM standards. *See* item 2 *infra*. A PSI should be conducted as part of an EIS before and not during construction as the 2018 alleged EA suggests.

c. Schwartzman Landfill.

Apparently, no new information has been acquired since the 2015 ISA. All of the assessment documents on this project to date have admitted that the landfill buffer is not well defined. No plan exists to prevent landfill gas migration. There is no knowledge of the actual range of contents in the landfill and, therefore, what dangers excavation of it may present to workers and the public (particularly the where the excavation would be adjacent to I-25). It remains a REC and only an EIS can determine where the boundary is and if it is possible to conduct construction safely along the proposed ROW.

d. Chevron.

Again designated as a REC in the 2018 alleged EA, the Chevron site is acknowledged as one where there is known contamination of groundwater and it is adjacent to the proposed route. The ISA recommends that BernCo seek landowner liability protection. This recommendation is a clear signal§ that further testing needs to be

done. The ISA suggests "discussions" to determine mitigation measures. ISA at 4.2. No liability protection and no mitigation design can occur in the absence of an EIS.

2. The 2017 ISA is fatally flawed because it does not meet the requirements of the ASTM Standards Practice for Environmental Assessments.

ASTM defines a REC as, "the presence or likely presence of any hazardous substances or petroleum products, in, on, or at a property: (1) due to the release to the environment; (2) under conditions indicative of the release to the environment; or (3) under conditions that pose a material threat of a future release to the environment." ISA at 1-3, § 1.2 The ISA contractor asserts it was hired to identify RECs related to past and current practices, yet fails to recommend RECs for numerous sites within the projected ROW and adjacent properties. The nature of the "recognizance" performed on the preferred alternative was limited to searching regulatory data bases, sporadic telephone calls, mail questionnaires, and "drive-by" inspections. ISA at 4-21. Despite uncovering evidence of prior petroleum releases from leaking underground storage tanks, regulated RCRA sites, and evidence of lead in soils, the ISA does not recommend RECs for properties within the ROW on Woodward and for thirteen (13) sites adjacent to the Woodward ROW.

Along Broadway, within the proposed project, the ISA identified the hazardous waste "benzene" at the Chevron property. However, it determined not to designate it as a REC, as no hazardous waste was "observed." ISA at 4-9. Similarly with Ever Ready Oil. As no hazardous waste was "observed" within the ROW, the ISA also does not deem it as

a REC, despite the ISA noting Ever Ready Oil's known history of handling "ignitable hazardous waste, corrosive hazardous wastes, lead and mercury."

The same failure to designate a REC applies to JTC, Inc. at 248 Woodward ("no observation") and Contech Construction at 150 Woodward ("not listed on a database indicative of a release").

Each of these is an example of the complete and utter failure of the 2018 alleged EA to assess the preferred alternative in accordance with ASTM standards. Those standards are quite explicit in not requiring the actual presence or release, but merely a material threat of a future release, as triggering the REC designation. The proposed Sunport/Woodward Road project calls for digging to a depth of twenty (20) feet. The threat of a release at some or all of these properties is evident. Each of the ROW and adjacent properties with any prior history of hazardous chemical and other substances or petroleum should have been designated RECs and, in so doing, should have disqualified the preferred alternative and required that the no built alternative have been selected.

Upon close examination of the ISA, it is difficult to imagine a road segment that could be a worse candidate for the kind of project being proposed here. As a result, given the unknown risks and costs of the project, certainly, even the wisdom of expending the money needed to prepare a very much needed EIS must be questioned.

The EA and its supporting ISA fail to comply with FHWA Guidance that calls for maps clearly delineating the extent of the hazardous waste sites in relation to the alternatives, information on the number and types of sites, and the relative costs of cleanup and justification for not avoiding the sites. FHWA Checklist for Addressing

Hazardous Wastes in EIS at Table 5.4.1. None of these tasks were performed as part of the ISA and would need to be included in an EIS of the preferred alternative.

FHWA issued a guidance document, "Interim Guidance – Hazardous Waste Sites Affecting Highway Project Development (August 1988). ("*FHWA Interim Guidance*"). It requires that an EA adequately investigate for the presence of known or unknown hazardous substances or wastes. *FHWA Interim Guidance* at 11-13. Here the limited investigation through local interviews and cursory drive-by field reviews fails to meet this standard. The "FHWA Supplemental Hazardous Waste Guidance" (January 16, 1997) ("*Supplemental Guidance*") calls for the "early" testing of the preferred alternative to confirm and estimate the contamination cleanup. It provides that, "In some cases, the extent of the contamination problem found through limited testing could lead to a reconsideration of the preferred alternative and the selection of another alternative." *Supplemental Guidance* 2 at 2. In this case, even the flawed ISA discloses the threat of possible contamination, yet there is no recommendation to reconsider the alternative.

The FHWA Supplemental Guidance further provides that, "It is necessary, prudent, and cost effective to provide this lead time by conducting a base of limited testing of the preferred alternative for the final environmental document." *Supplemental Guidance* 2 at 2-3. The FWHA should not give a tacit approval to the EA by issuing a FONSI in this case (which presumably would be the final environmental document pertaining to the project). Instead, it should either permanently reject the project or direct BernCo to proceed with an EIS that includes such testing. In order facilitate such testing, the *Supplemental Guidance* urges the lead agency to gain voluntary access to the

property. This seems unlikely in this case; especially along the Woodward corridor, given the poor record the ISA recounts in receiving responses from property owners. ISA at 6-2, Table 6.1.

Failure to do testing prior to ROW acquisition subjects the County, as lead agency and then owner of the ROW, to liability for the subsequent clean-up of any contaminated properties that emerge during construction. In this context, it is important to note that it is not uncommon for disturbed waste to emerge *after* construction is completed.

Potential liability in such a situation is the subject matter of FHWA's Interim Guidance ("*Interim Guidance*"). The *Interim Guidance* describes how liability for cleanups under CERCLA might attach in the case of ROW acquisition and how liability could attach to BernCo unless it meets the "due care" standard or can assert the "innocent landowner" defense. Neither is likely to be available with regard to the ROW acquisitions necessary for the proposed project. There is no better illustration than that found in the ISA. ISA at 1-2. There, the contractor advises BernCo to seek landowner liability protection. Even the contractor AECOM/URS wants to distance itself from this inadequate ISA by stating that it, "cannot warrant or guarantee that not finding indicators of hazardous materials means that hazardous materials do not exist on the subject site" ISA at 1-8.

Failures to designate RECs and failure to conduct on-site testing along Sunport and the Woodward corridors invites the possibility of subsequent disclosure or discharge of hazardous materials and the potential liability attaching to BernCo.

FHWA's "Guidance on Limitation of Claims Notice" under 23 USC 139(l) sets forth procedures that allow Federal agencies to assert a 180-day time limit for seeking judicial review of Federal Agency decisions on highway projects, including EA and EIS documents. Question E-11, "SAFETA-LU Environmental Review Process – Final Guidance" (issued jointly by the FHWA and DOT). If BernCo were to avail itself of this much abbreviated statute of limitations, it could escape liability for damage resulting from hazardous waste discharges that occur or are discovered after the expiration of 180 days of the notice.

Proceeding with the preferred alternative under these circumstances could create a new hazardous waste cleanup site with no responsible party. That would, potentially, put the new site at the bottom of a very long list of unfunded Superfund cleanup sites.

Under the circumstances described above, the proposed Sunport Extension/Woodward Road Improvement Project should be abandoned and the no build alterative selected. The reasons for this conclusion follows from the above analysis:

1. The EA fails to establish that the proposed project has a purpose.

2. The EA fails to establish that the proposed project is needed.

3. In the absence of an established purpose or need the selection of the preferred alternative and the alternative analysis is flawed and the no build alternative should be selected.

4. Even if purpose and need can be said to exist the EA fails to establish that the preferred alternative justifies the adverse environmental consequences' that would result.

5. The EA discloses a clear threat of adverse environmental consequences. No FONSI should be issued and an EIS is a necessary requirement for the project.

6. The consequences of proceeding with the preferred alternative without an EIS could trigger new hazardous substances discharges in a setting in which no party or governmental entity would be responsible for the cleanup.

When considering the hazardous waste issue in the Sunport Extension/Woodward Road corridors, BernCo and AECOM would do well to heed these words and be very "interested" in the difficult unknowns in the proposed project:

> Reports that say that something hasn't happened are always interesting to me, because as we know, there are known knowns; there are things we know we know. We also know there are known unknowns; that is to say we know there are some things we do not know. But there are also unknown unknowns -- the ones we don't know we don't know. And if one looks throughout the history of our country and other free countries, it is the latter category that tend to be the difficult ones.

Secretary of Defense Donald H. Rumsfeld (February 12, 2002).

III. THE MYTH OF DESIGN OVERLAYS AND THE HYPE OVER TRAILS.

A. Design Overlays and Hike/Bike Trails in an Industrial Wasteland.

The 2018 alleged EA, and the comments of a few people and the presenters at the July 19, 2018 public meeting, highlight the (alleged) "necessity" of developing Sunport Boulevard, via Woodward Road, down to 2nd Street, as well as the lack of viable alternatives to get from Broadway to Sunport Boulevard except up Woodward Road past Edmund Street. Significantly, however, other related planning documents do not support the rationales presented in the 2018 alleged EA and the presenters and a few commenters at the July 19th public meeting.

For example, the *Sunport Boulevard Extension Broadway to I-25 Alignment Study: NMDOT Combined Phase A/B Report* (November 2010) ("*Combined Phase A/B Report*") – which is the basis for the three (alleged) EAs produced so far – makes it quite clear that there is no justification under current planning scenarios for extending Sunport beyond Broadway. See *id.* at 3 ("Study Limits"), and at 4 ("Project Location Map"). This clear statement in the *Combined Phase A/B Report* is probably why the three references to it in the 2018 alleged EA ignore the Study Limits section and imply that the *Combined Phase A/B Report* concerns the extension of Sunport Boulevard down to 2nd Street. It is a convenient way to attempt to make it appear as if there were an actual EA of the now combined Sunport Extension/Woodward Improvement Project – when, in fact, there is none (hence our use of the moniker, "2018 alleged EA").

The 2018 alleged EA also discusses the "San Jose/Mountain View Design Overlay Standards" ("SJ/MV Overlay"). The SJ/MV Overlay is in "process" and is supposed to "work in tandem with existing zoning designations." 2018 alleged EA at 41. However, the County, while stating that it does not have the SJ/MV Overlay finished, has already produced the 2014 *Sunport Commerce Center Design Overlay*[1] ("*Center Design Overlay*"), which overlaps the area of the proposed Sunport Extension and covers almost the entire area between I-25 and 2nd Street and Woodward to Rio Bravo. *See Center Design Overlay* at 2 (map). The actual role of the oft-promised SJ/MV Overlay is questionable, though. The 2018 alleged EA states that current land uses "are permitted

[1] A PDF copy of the *Sunport Commerce Center Design Overlay* is located at the end of the Appendix to these comments.

by the existing zoning and encouraged in the planning documents for the area." (Emphasis supplied). *See* 2018 alleged EA at 46 (item 4.13 in the table).

The 2018 alleged EA tries to give the impression that much of the area is "light industry". *See, e.g.* 2018 alleged EA at 41 ("the Southwest Area Plan ... identifies a major light industrial corridor in the Project area"). Most of the entire area between I-25 and 2nd Street south of Woodward, however, is M-2 Heavy Industry; the "major" M-1 Light Industry area is north of Woodward and west of I-25 at the Woodward/Edmund intersection area. *See Center Design Overlay* at 34 (map). The SJ/MV Overlay, on the other hand states that it is, "intended to positively influence development patterns and enhance the character of the area." *Combined Phase A/B Report* at 60. It is difficult to see how the County intends to both encourage existing land use, almost all of which is M-2 Heavy Industry, while "positively" enhancing "the character of the area" already severely scarred by industrial blight: old, ugly unpainted and poorly maintained industrial facilities, heavy truck traffic, noise, industrial chemical and petroleum odors, asphalt processing odors, dust from graveling and concrete rubble and the odors from these activities, and the chemical and fuel emissions from the railroad yard.

The *Center Design Overlay* provides some very useful additional information for evaluating the veracity and utility of the 2018 alleged EA.

The "Commerce Center" area is divided into two parts. One part is east of Broadway and will contain "heavy industry and airport support services". *Center Design Overlay* at 29. Directly contradicting the promises of the 2018 alleged EA and the supposedly "positive enhancement" the SJ/MV Overlay promises, these businesses, the

Center Design Overlay states, "may have a deleterious impact on the overall development of the area." *Id.* at 42. The other part is west of Broadway and will have a "similar" character (it is zoned in the same manner) but with an emphasis on "light to clean industries." *Id.* at 29.

The *Center Design Overlay* states that is will, "Promote sustainable development through the recruitment of clean industry as well as the use of best practices in the design of landscape and the built environment." *Id.* at 1. Apparently, having design overlays will convert an area zoned M-2 Heavy Industry (with the noxious characteristics described above) into an area with M-1 and "clean" characteristics. Alternatively, this implies that the County – despite constant statements to the contrary about not being able to change zoning – can prevent or discourage heavy industry where it is a permitted (and "encouraged") activity.

The *Center Design Overlay* also states that extending Sunport Boulevard to 2nd Street "could attract additional interest for airport-related cargo and other businesses."[2] *Center Design Overlay* at 27. At the same time, however, it points out that the railroad easement on 2nd Street limits access to and from 2nd Street for any businesses located east of the tracks. *Id.* at 41. In other words, those businesses (and the new, additional traffic

[2] This is an interesting statement given that the parcels of undeveloped (and possibly brownfield) land on Woodward Road between Broadway and 2d Street include several owned by Sunport parking facilities east of I-25. This means that BernCo should be well aware – and making the FHWA aware – that the likely uses of the area include very large car parking facilities that will bring unanalyzed amounts of additional traffic (autos, jitneys, and perhaps busses), 24/7 year-round noise and transport pollution, as well as light pollution from all night lighting on high poles or towers for each parking area. This should be a very pleasant overlay on the existing industrial scene that, surely, local residents will enjoy. This is a very likely and unanalyzed set of consequential (adverse environmental) impacts due to the Sunport/Woodward Road improvement project that the 2018 alleged EA conveniently ignores.

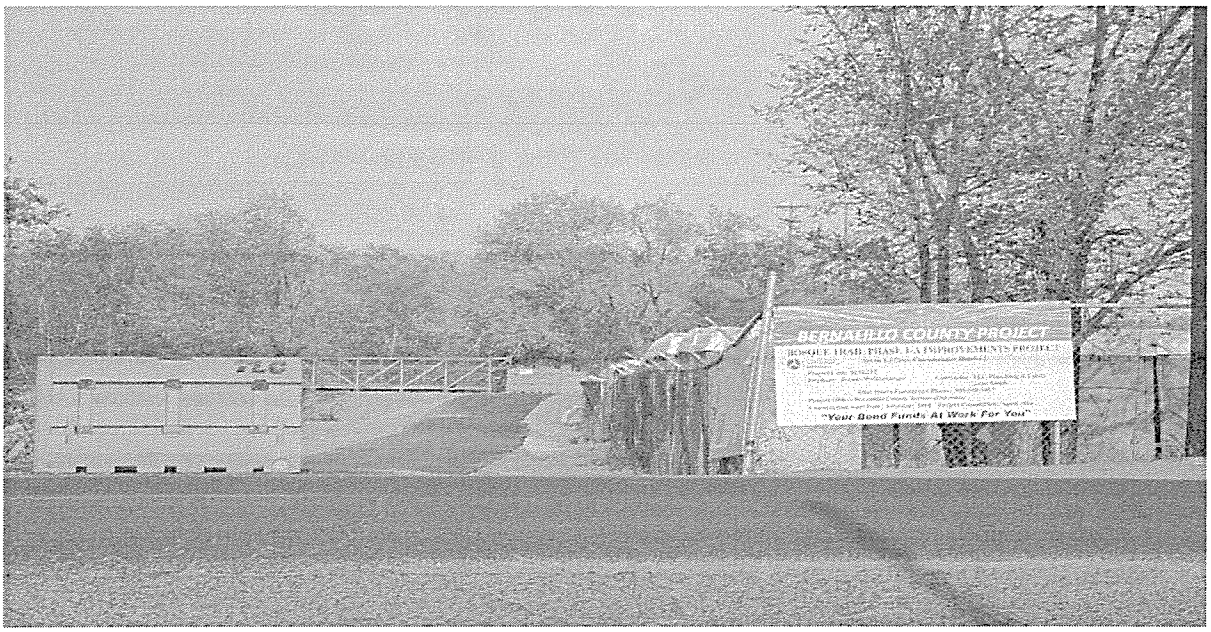
they create) would have to look for a way to get out of the area other than using 2nd Street.

The *Center Design Overlay* provides a very useful map that ostensibly shows the "Potential gateway signage locations," yet also shows an entire network of proposed streets in the *Overlay* area. *Id.* at 11. Most of the network of proposed streets is in the southern part of the Sunport Commerce Center near Rio Bravo. This means that BernCo believes that future businesses will move into and out of the area using Rio Bravo. Curiously, one of the East-West streets shows an arrow pointing west when the street reaches the railroad, which it cannot get across. This southern area is also the location of the "Sector Development Mountain View Transit-Oriented Development Zone" (SD/MV-TOD), the purpose of which is, "to provide higher density residential and mixed-use development with retail and employment in a pedestrian-oriented area and with ready access to commuter rail and other transit amenities." *Center Design Overlay* at 33. Apparently, the County was able to re-zone an area in the South Valley to accommodate this new and very different use.

Most interesting of all, though, is the proposed extension of Stock Drive across the South Diversion Channel to a terminus at Edmund, which is re-routed to angle up to the current Sunport/I-25 terminus. *Sunport Commerce Center Design Overlay* at 11. While not exact, this looks quite similar to a rejected alternative route (Alternative D) for the Sunport Extension, rejected in part because crossing the South Diversion Channel would require a too-steep grade and a too-skewed crossing. Apparently, both these problems

were solved in 2014, with Stock Drive crossing the Channel perpendicularly and Edmund providing access to Sunport Boulevard.

Finally, much of the "positively enhanced" industrial landscape depends on providing sidewalks, bike lanes, and multi-use trails. The bike path down Woodward is touted as connecting the existing Riverside Trail with the Sunport by way of a recently-built extension from the Riverside Trail to 2nd Street and Woodward. *Combined Phase A/B Report* at 49; see photos below. However, this extension passes along the southern boundary of a facility for industrial "Port-a-Potties" and, it is fair to say, absolutely reeks with highly offensive odors. On the other side is a company that handles construction rubble. Bordering the trail, it contains on-site rubble piles easily 30' high which, on windy days, occasionally stream offensive smelling dust. Few people will find this an appealing biking or hiking trail.



Porta-potties on 2d Street adjacent to the bike trial.

Construction material facility on 2d Street near intersection with Woodward Road

Aerial view of 2d Street and Woodward Road showing Porta-potties, construction materials site pictured above and the entrance to the riverside trails

Trails are also proposed along the South Diversion Channel and the San Jose Drain. *Sunport Commerce Center Design Overlay* at 5 (map). The San Jose Drain is especially problematic. In 2009 and 2010, Amigos Bravos, a New Mexico non-profit with the mission of enhancing, protecting and preserving state water quality, conducted water quality monitoring in the San Jose Drain just south of the former GE facility. The monitoring revealed extremely high levels of *E.coli* and Arsenic. The Arsenic apparently originates from a now-defunct facility that treated lumber with creosote and other chemicals. The bottom of the San Jose Drain is a thick, tar-like muck. Neither the Drain nor the Channel is very attractive in itself as a place to walk or ride a bike, nor for the immediate views of industrial sites, sounds, and disagreeable odors.

B. Design Overlays Instead Of Environmental Justice.

The Project 2018 alleged EA claims it will improve connectivity from industrial areas along Broadway Boulevard and Second Street to I25 and the Sunport, which may attract additional businesses to the area. As described previously, as well as in the supplemental comments of Steven and Esther Abeyta at the end of these comments, community concerns have been expressed about the potential adverse impacts of additional industrial development. Community residents of San Jose and Mountain View have been told over the course of the Sunport/Woodward project development that potential mitigation measures for these concerns will include existing zoning and land use mechanisms to review and regulate development and the San Jose/Mountain View Design Overlay standards, which have yet to be completed. They are also told that additional businesses in the area may also have positive economic impacts. Yet, these

design overlays cannot control expansions of polluting businesses in the area absent a zoning change and the relocation of the most polluting industries.

The adjacent San Jose and Mountain View neighborhoods have a relatively high proportion of low-income and minority residents and have been subject to the impacts of older industrial uses in the area that have caused pollution. Residents of these neighborhoods are concerned that the Project would attract additional undesirable, polluting, or nuisance businesses to the area. To address these concerns, the County is preparing the San Jose/Mountain View Design Overlay standards, which are intended to positively influence development patterns and enhance the character of the area. Unless and until there are zoning changes that will prohibit further industrial development coupled with the creation of a buffer between the affected communities and the existing industries and cumulative impact pollution controls, design overlays are just lipstick on a pig—much like the lovely bike/hike trails threaded between piles of Porta-potties and giant piles of construction waste.

IV. SUPPLEMENTAL COMMENTS OF STEVEN AND ESTHER ABEYTA

A. COMMENTS ON THE 2018 ALLEGED EA ("EA") BY SECTION.

1.1 Purpose and Need.

The Sunport Extension road project is not necessary because improvements to I-25 and Rio Bravo Blvd. Improving access for industrial development seems to be the main motive for developing the project. There will be no traffic congestion relief because the project will increase traffic on 2nd Street going southbound which is a single lane unimproved congested roadway. Multimodal transportation will be dangerous traversing

the Sunport Extension because riding a bicycle next to a semi-truck at 45 MPH is extremely hazardous and risky. Walking on sidewalks next to semi-trucks accelerating their engines to get up the 7% grade is too deafening and may damage pedestrian hearing without ear protection.

1.3 Public Involvement throughout the Process.

Throughout the process the public was against the project because our concerns were never adequately addressed. The concern of traffic increases was only stated as a fact and no improvements to south Broadway Blvd and south 2nd Street were addressed. The GE superfund site remediation wells may be relocated and how this will affect the water remediation was not answered and remains unanswered today. At many meetings we were silenced and not allowed to speak or ask questions; instead we were referred to posters and to use sticky-notes. This is not adequate public involvement.

2.1.1 Development of the Current Project.

Outdated studies are used to justify the project even though improvements are being made to Rio Bravo Blvd and I-25 that correct traffic issues. Access studies to airport are old. Today access to the Sunport from Southwest Albuquerque is easy because there are 6 access points (1. Rio Bravo then University Blvd to Sunport, 2. Rio Bravo then I-25 to Sunport, 3. Gibson Blvd then I-25 to Sunport, 4. Gibson Blvd to Yale Street, 5. Gibson Blvd to Girard Blvd, 6 Rio Bravo then University Blvd then Randolph Road to Yale Street). Adding a seventh access point will disrupt current routes because of dealing with traffic from Sunport to I-25. There is mention of the proposed South Diversion Channel Multi-Purpose Trail will connect to the Sunport Extension. There is no

explanation how the trail connection will be built. Planners usually choose a logical and less expensive route that handles access from both directions instead of two separate pedestrian bridges from the Sunport Extension to the Multi-Purpose Trail on the South Diversion Channel. Therefore, access to a multimodal trail should not be a consideration to build the Sunport Extension.

2.2 Project Purpose and Need.

The project was conceived in in the late 1980s and may have made sense in that point of time. Today the project is not needed because there are 6 access points to the airport. Routing traffic from I-25 to Woodward Road then 2nd Street will only add more traffic congestion to an already busy intersection of 2nd Street and Rio Bravo Blvd. 2nd Street is a single lane roadway with no sidewalks or drainage system and very narrow shoulder about 8 to 12 inches. 2nd Street is in need of many repairs. South Broadway is aging two lane highway with no sidewalks and storm drainage and is in disrepair. Adding an additional 10,000 vehicles traveling southward on 2nd Street and an additional 20,000 vehicles traveling southward on Broadway Blvd is a disaster in the making. I strongly believe both 2nd Street and Broadway need to be improved prior to any construction of the Sunport Extension. It is stated in the Environmental Assessment to improve access to economic centers and related commercial and industrial development through a more direct roadway link from the Sunport and I-25 to Broadway Boulevard and Second Street. This is the first instance of truth specifying the real reason for the Sunport Extension. The county wants to have the area developed even if it means attracting recycled asphalt

plants, hot mix asphalt plants, petroleum storage facilities, metal shredding facilities, cement batching facilities or any other company that can build in M-2 and SU-2 zoning.

3.4 Preferred Alternative

The EA states that a steep, 7-percent profile grade would be necessary. Heavy-truck traffic would experience a slow climb from Broadway Boulevard to I-25; however, the two eastbound uphill lanes would provide adequate capacity, with the outside lane available for slow-moving vehicles. Then in section 3.4.1.2 Bicycle and Pedestrian Accommodations it states two bike lanes (one in each direction) would be included. I myself am an experienced bike rider and ride my bicycle to work every day. I personally feel it is extremely dangerous to ride a bicycle along the side of a semi-truck traveling at speeds of 45 MPH. Whom in good conscious can recommend the Sunport Extension as a safe alternative traveling east of I-25.

4.9 Cultural Resources

The EA states On June 3, 2016, the SHPO concurred that the proposed Woodward Road Improvements would have no adverse effect on any historic property listed, or eligible for listing, on the NRHP. There is a history that is not mentioned in the EA. The route of the Sunport Extension is on a historical site of great significance that tells the sacrifice a community endured for the building of nuclear weapons for the safety of the country. Then our community transitioned in to air craft engine parts. We are a patriotic community that suffered with environmental wastes to serve our country. Many died as a result of the contamination. The location and placement of the many injection and

extraction remediation wells tells the story of San Jose and the price the community paid for our country's freedom. This site should be preserved to tell our story of suffering.

4.10 Air Quality

The EA states Principal sources of CO in the project study area are vehicular traffic on the street system as well as emissions from industrial sources of the area. Under certain conditions, high traffic volumes result in localized impacts—or "CO hot spots"—which are detrimental to the health of people who are exposed. The San Jose neighborhood will be impacted by an increase in semi-truck traffic emitting more air pollution in an area that is dealing with environmental justice issues. In addition to that we will be ground zero for new industrial companies applying for air permits. Regardless of the amount of emissions the air permit will be approved. The Sunport Extension will be the impetus that attracts these industrial companies to the area. For the EA to state there will be reductions in future emissions should be a red flag demonstrating the eagerness to complete the project even if disingenuous statements are purported.

4.11 Noise

The EA specifies; State and federal policy stipulates that when traffic noise impacts occur, noise abatement must be considered and implemented if found to be feasible and reasonable. As easily predicted San Jose will not receive any noise mitigation. This is another reason the Federal Highway Administration must insist on an environmental impact statement to be completed. The community is supposed to endure additional noise because of the imposition of an unnecessary road project.

4.14 Socioeconomics and Environmental Justice

The EA states; Executive Order 12898, regarding Environmental Justice, seeks to prevent federal policies and actions from creating disproportionately high or adverse health or environmental impacts to minority or low-income populations. The community is already dealing with a disproportionately high or adverse health or environmental impacts to minority or low-income populations because of legacy air quality issues, environmental racism. The San Jose and Mountain View neighborhoods is where the city and county locate most of the polluting industries. We have high levels of PM 10, PM 2.5, Volatile Organic Compounds. The San Jose neighborhood has 12 railroad tracks with Petro-chemical tankers queued by the hundreds. We have an asphalt plant, major petroleum storage facilities, cement manufacturing, marble cutting, construction material disposal, metal shredding, several hazardous chemical storage facilities, and three superfund sites. So, San Jose is not your typical neighborhood because of these visible disparate impacts evidenced by ground, air, and water pollution that are constants in our daily lives due to heavy truck traffic and railroad shipments idling then loading onto truck, industrial and traffic noise, dust, and chemical odors which cause burning in the eyes, nose and chest. The Sunport Extension will worsen these disparate impacts that already burden our community.

4.20 Hazardous Materials

Please see the attached document in Appendix A, "Air Force Plant 83" that chronologically details the history of that site. It is a recognized environmental concern (REC) and there may be new hazardous waste yet to be unearthed. The Schwartzman

Landfill is a construction hazard due to potential methane gas releases during excavation. There were no laboratory tests of soil borings of the hazardous waste areas in the Sunport Extension and Woodward Road corridors performed as part of the Environmental Assessment. The EA only mentions visual site reconnaissance and internet research. This is insufficient and required an EIS be performed covering the entire project.

4.22 Indirect Effects

The indirect effects will be long lasting and irreversible causing irrevocable harm. How many more people need to get sick in the communities of San Jose and Mountain View? Our own county will not stop the scourge. Our Environmental Health Department has done nothing to protect the community by denying new air permits. The Environmental Health Department tells us they must approve all air permits and cannot deny permits if emissions are with in statutory limits. The project will only increase the air pollution that has damaged so many people in our communities.

The EA states that the conclusion of this analysis is that the Project could induce growth in the surrounding area. The extent of positive economic effects or negative community impacts depends on the degree to which the County engages in proactive planning and land development controls. The community has engaged public officials as evidenced with documents quoted in the Environmental Assessment. We (the community) have engaged in countless battles opposing new polluting companies from locating in the area however to no avail. In 2017 we attempted to get protections through the City of Albuquerque's new comprehension plan and integrated development ordinances through meetings and documents and were not successful. The land is zoned

M-2 and SU-2 the most permissive zoning codes in the county. The community was told by an official from GE if we wish to change the zoning we need to purchase the land and request a zone change with the proper officials. Past performance is a good indicator of future results; we have a legacy of great magnitudes of pollution as evidenced by 2 superfund sites in our neighborhood. The future looks bleak if the Sunport Extension is built.

My message is for the New Mexico Department of Transportation and Federal Highway Administration: our local county government will not help us stop the project or reduce adverse land uses. The onus of protecting the communities of San Jose and Mountain View is in your hands, and either you will help us or marginalize us like our local county government officials are doing now. Now, Albuquerque Mayor Tim Keller is opposing this project and has written to the FHWA and project proponents stating that opposition.

4.23 Cumulative Impacts

In New Mexico Administrative Code at "Title 20, Environmental Protection, Chapter 11 Albuquerque - Bernalillo County Air Quality Control Board" there is no mention of cumulative impacts. Yet, in San Jose and Mountain View, we suffer from the cumulative impacts I described in section 4.14 above. These state regulations implement the laws that are supposed to protect us. San Jose and Mountain View are not your typical neighborhoods because we are saturated with many industrial companies and we are subjected to a multitude of emission sources. Depending on the wind direction and smelling the air residents can identify the source of emissions. We know the difference

between chlorobenzene, sulfur, train emissions, diesel truck emissions, gas engine emissions, steel shredding, smell of a hot mix asphalt, refineries, sewage treatment facility, sawdust, production of fertilizing mulch, airport emissions, and much more. We know everything about cumulative impacts because we live in our neighborhoods. We have presented the concept of cumulative impacts to the Environmental Health Department and to Albuquerque - Bernalillo County Air Quality Control Board as of today's date we have not received any protections that address cumulative impacts and the Sunport Extension will not address our concerns on cumulative impacts it will do like the other departments and deny cumulative impacts exist in our neighborhood of San Jose and Mountain View. It is sad to report according to the adjudicatory guidelines; in order for us to present evidence of cumulative impacts to the Albuquerque - Bernalillo County Air Quality Control Board we need to hire a toxicologist, health scientist, and an attorney.

We need an environmental impact statement completed to address cumulative impacts of the proposed project in this case – one that includes all of the current the emission sources and future sources; not just vehicle emissions from the project because the EA has already mentioned indirect effects.

5.0 Public Involvement Process

We have had several meetings on the Sunport Extension over the years at some public advertised meetings we were silenced and not allowed to speak publicly or ask questions to the presenters. We were told we have to go to easels and write our concerns on post-it sticky notes. In fact at the latest public advertised meeting on July 19, 2018 we

were able to present our ideas verbally, however we were not allowed to ask any questions to the presenters. The Environmental Assessment talks about public engagement then we are engaged with reality and stifled from asking questions because the presenters may say the truth and jeopardize the project, this is a classic Bernalillo County tactic. These are our notes of the meetings and some of our comments:

5.1 Public Involvement Meeting Dates: Esther's notes on the months and year BernCo states in the 2018 alleged EA.

June 3, 2010 – Public Meeting held at Bernalillo County Public Works The 3 Signup sheets from the 2011 EA showed most of the people where business, industry and San Jose and Mountain View's city and county assistant representatives, and other government agency representatives.

October 18, 2011 – Public Hearing held at East San Jose Elementary School 39 members of the public attended. This is the meeting I heard of the road project a day before the meeting from Angela West of Mountain View. The meeting was documented by a stenographer. At the end of the meeting I requested a hard copy of the 2011 EA from URS. Submitted via email written comments.

Because of the public comments submitted at the public hearing BernCo had the following meetings:

January 26, 2012 – meeting held at Bernalillo County Public Works with San Jose and Mountain View Neighborhood Associations. The meeting was set up by Commissioner De La Cruz's Assistant Dolores Herrera. We were shown a calendar with designs and was told we could pick the design on the side of the Sunport extension wall. The meeting

was also to discuss the location of the February meeting. BernCo told us they will notify the community of San Jose via mail in English and Spanish.

February 9, 2012 a meeting was held at Herman Sanchez Community Center. In response to comments received from the October 18, 2011 Public Hearing. 51 members of the public attended. Public was allowed to make comments out loud.

Various dates – Small Group/Neighborhood Association Meetings. We have no idea what this refers to and could not find out who was in these small groups or where the meeting were held.

August 2013 – San Jose & Mountain View Neighborhood Association Meetings.

September 18, 2013 Public Involvement Meeting was held at East San Jose School to provide project related information and a status update on the revised EA document. According to EA 85 members of the public attended. The public was given a PowerPoint presentation, then was told "there would be no questions or comments out loud, questions or comments would be addressed at the stations on a post it note or on an easel pad.

April 2015 South Valley Transportation Public Meeting. Meeting was hosted by Mid-Region Council of Governments to share information about the many transportation projects planned for the South Valley.[3] Yet another public meeting where the public was told, "there would be no questions out loud, questions would be addressed at the stations." One station for the Sunport Extension/Woodward and the other for 2nd St road

[3] Below is a link to Mid-Region MPO that will be explained at the meeting: http://www.mrcog-nm.gov/latest-news/1242-meeting-to-focus-on-south-valley-transportation-improvements

projects in and around the development of Valle de Oro. The public could not ask questions out loud but Thaddeus Lucero asked for everyone in the room to introduce themselves. BernCo, ABQ Transit, and NMDOT gave PowerPoint presentation on the road projects. The majority of the road projects talked about where in the Unincorporated Bernalillo County with the exemption of Woodward in the city. It was mentioned each road project will have its own meeting at a later date. The Woodward Road project is a separate project from the Sunport and Woodward would have to be built first.

August 5, 2015 – Public Hearing on the release of the revised July 2015 EA. The Public Hearing was held at Mountain View Community Center.

Not mentioned in the 2018 EA - Woodward Road Improvements November 18, 2015. Public Meeting regarding Woodward Road Improvements was held on November 18, 2015 at Herman Sanchez Community Center. The purpose of the meeting was to discuss proposed improvements to Woodward Rd between 2nd St. and Broadway. BernCo was going to share information on:

- Project background and development process
- Roadway widening and improvements alternatives
- Results of coordination with BNSF Railway regarding crossing and transfer operations.

This was a meeting where the public was allowed to speak.

Steven and Esther's comments at the Woodward Road, November 15, 2015 meeting:

1. When we spoke about undocumented hazardous wastes we were referred to the appendix on the Sunport Extension Environmental Assessment that deals with recognized

environmental concerns. We indicated we were specifically speaking about the undocumented hazardous waste and not documented hazardous waste from all the companies from American Car Foundry all the way to GE. The County feels there is no need for any additional assessments of environmental waste.

2. We asked about the project segmentation and was told that Woodward has a categorical exclusion, yet we are being referred to the Sunport EA. The County stated that going forward all projects with the NM Federal Highway Administration will utilize Categorical Exclusions.

3. We spoke about how quiet railroad crossing was unobtainable because of safety for the remote operators who are on the ground and signaling has to be used. The County stated they are planning to meet with BNSF officials. We do not feel it is right for BernCo and URS/AECON to make locked door decision with BNSF of other entities without including the community of San Jose. The other concern I have with BernCo and URS/AECON meeting with BNSF – BernCo is going to negotiate some sort of railroad queueing scheme with Gandy Dancer and BNSF. A scheme where the community of San Jose is selected for all the queueing of railroad cargo and this will increase railroad activity at night in the neighborhoods of San Jose vs the community of Mountain View.

4. We asked about being locked out from turning north on William when traveling east on Woodward and we were told that traffic channelization will not be utilized. BernCo stated on May 16, 2013 at a meeting that the quiet railroad crossing design may affect the ability (of the residents in the San Jose Community) to turn from William St onto Woodward St. that indicates quiet crossing does not allow left turns.

5. We asked about being able to turn east on Woodward from William St and we were told about the use middle traffic lanes on Woodward. This is a questionable response because of railroad quiet crossing guidelines and the statement BernCo made in 2013.

6. We spoke about traffic being backed up at Woodward when utilizing the intermodal facility and we were told that "timed deliveries" will continue as usual and non-essential deliveries will be done at night. This is another example of BernCo negotiating on behalf of the project and not finding a solution to improve the conditions the community is dealing with. The noise (train honking) is already burdensome at night and additional non-essential deliveries will only exasperate the noise. Noise levels that will affect the residents of San Jose from sleeping.

7. The County spoke about a double turning lane from 2nd street thus giving us the impression there is going to be more traffic than what is projected. We feel we are being misled.

8. Councilor Benton stated that there should be road, bike lane, landscaping, and then sidewalks in complete streets model. The County stated the project will have road, bike lane, sidewalk, then landscaping Councilor Benton stated the landscaping is a barrier from traffic.

6.0 Final Observations/Comments.

There are many inconsistencies in the Environmental Assessment and some of the impacts are mentioned however the impacts mentioned always come to the same conclusion that there are no impacts. We the residents living in San Jose and Mountain

View neighborhoods are opposed to the project because it will significantly impact our neighborhoods. We are told traffic will be reduced traveling north on Broadway Blvd and 2nd Street and increase on southbound traffic. Our traffic issues have always been related to southbound traffic and the project that is supposed to bring traffic relief will only increase traffic. We are in the process of road improvements on Rio Bravo Blvd to I-25 that is addressing the traffic issues of gaining access to I-25. The project is not needed and should be tabled.

There should not be a finding of "no significant impact" because the project will have a significant impact two environmental justice neighborhoods for many lifetimes. Instead, the FHWA should entirely reject this project. If FHWA will not do that, it should require an Environmental Impact Study (EIS) for the reasons above.

V. CONCLUSION.

The Letter from HIP that follows these Comments and the documents contained in the Appendix are hereby incorporated herein by reference. For the reasons stated above and in the referenced documents, the No Build alternative should be selected for the project.

APPENDIX

A

CONTENTS:

1. 2018 Comment Letter from HIP
2. Comments submitted in 2015 which include HIP comments.
3. Comment letter on Woodward Project
4. FHWA Letter to NMDOT rejection 2015 EA
5. Report on Air Force Plant 83

HUMAN IMPACT PARTNERS

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July 26, 2018

Mr. Peter Hinckley, AECOM
6501 Americas Parkway NE, #900
Albuquerque, NM 87110
By email to: peter.hinckley@aecom.com

Subject: Comments on Sunport Boulevard Extension and Woodward Road Improvements Environmental Assessment

Dear Mr. Hinckley:

Human Impact Partners submits the following comment on the April 2018 Environmental Assessment about the Sunport Boulevard Extension and Woodward Road Improvements. As this letter will accompany comments that New Mexico Environmental Law Center ("NMELC") will submit on behalf of SouthWest Organizing Project ("SWOP") and Esther and Steven Abeyta, we have forwarded it to Attorney Jonathan Block to file with the NMELC comments.

Background and Qualifications

Human Impact Partners is a recognized national leader in the field of Health Impact Assessment (HIA), a process used to assess possible impacts of a Sunport Boulevard Extension project, as described in earlier iterations. We co-founded and have led the Society of Practitioners of Health Impact Assessment and have co-authored widely cited guidance for the field, including: *Minimum Elements and Practice Standards for Health Impact Assessment*;[1] *Guidance and Best Practices for Stakeholder Participation in Health Impact Assessments*;[2] and *Promoting Equity through the Practice of Health Impact Assessment.*[3]

Human Impact Partners provides tools that empower communities to transform the places people live and play to support healthy living by increasing community awareness of social and environmental factors that diminish or impair health, and identifying policies and practices that are available to enhance and promote health in decision making. We have conducted public health research projects, including HIA and Health in All Policies projects, on the local, state and federal levels – with experience supporting communities across the country from Hawaii to Maine. Findings from our research and our recommendations have been applied by decision makers to

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[1] Bhatia R, Farhang L, Heller J, Lee M, Orenstein M, Richardson M and Wernham A. (2014). *Minimum Elements and Practice Standards for Health Impact Assessment, Version 3.* Retreived from: https://hiasociety.org/resources/Documents/HIA-Practice-Standards-September-2014.pdf

[2] Stakeholder Participation Working Group of the 2010 HIA in the Americas Workshop. (2011). *Best Practices for Stakeholder Participation in Health Impact Assessment. Oakland, CA, October 2011.* Retreived from: https://hiasociety.org/resources/Documents/guide-for-stakeholder-participation.pdf

[3] Heller J, Malekafzali S, Todman LC, and Wier M. (2013). Promoting Equity through the Practice of Health Impact Assessment. Retreived from: https://hiasociety.org/resources/Documents/HIA-Promoting-Equity.pdf

integrate health benefits into policymaking, planning, and project design and implementation. To date, HIP has conducted over 50 HIA projects in many domains, including transportation and land use. We have also provided training and technical assistance to government agencies and non-governmental organizations in over 30 states as they conduct their first HIAs. HIP has successfully assisted these partners as they apply the HIA process to identify potential health benefits, and develop policies to improve health and reduce health inequities.

Previous Comment on Revised Environment Assessment for Proposed Sunport Boulevard Extension

Human Impact Partners prepared a comment letter and report that were submitted as part of public comment in September 2015 about a Revised Environmental Assessment (REA) for the proposed Sunport Boulevard Extension. The letter and report highlighted significant issues that were not adequately addressed in the County's Environmental Assessment document for the proposed extension.

Human Impact Partners conducted the HIA with residents of the San Jose neighborhood, local advocacy organizations, and the New Mexico Department of Health, from June to November 2013. The draft HIA analyzed Bernalillo County's first publicly available Environmental Assessment for the Sunport Boulevard extension project, which was released in September 2011, in anticipation of an expected public comment period. However, the comment period was postponed, and nearly two years later in July 2015, the county released an REA. After a review of the REA, the HIA report was finalized in September 2015. Although updated data for measures gathered in 2013 for the HIA may be available, the data presented in the HIA remains valid and supports the findings described in this summary.

To date, we have not received specific responses to the significant issues raised in that comment letter and report. Significant issues identified at the time are summarized in a table from our original comment letter and report, which is provided here on the following page:

Summary Table: Significant Issues with the Revised Environmental Assessment (REA) dated July 2015	
Traffic congestion	- Evidence does not support or is insufficient to support the stated purpose and need for the extension to relieve congestion - Data generally demonstrates traffic volumes have stayed the same or decreased in recent years - The REA recommends building the extension even though data it provides suggests benefits if the extension is not built compared to if Alternative A is built. These benefits include: 1) greater reduction in vehicles for roadways predicted to have poor Level of Service in 2035 and 2) less traffic in 2035 for a segment of 2nd Street south of Woodward Rd – an important segment where increased volumes could contribute to new congestion, which the REA does not discuss - Data is inconsistent or absent; for example: 1) using different roadway segments in tables that model 2035 data for the No Build Alternative and Alternative A and 2) providing projected 2018 traffic volumes only for Alternative A, but not other alternatives - Fails to provide substantive data on how improved access to economic centers will further contribute to vehicle traffic
Air quality	- Fails to provide data on the amount or type of emissions permitted for sources in the neighborhood today, where a Health Impact Assessment found residents who make up less than one percent of the city's population bear much greater shares – from six to 11% – of permitted levels for seven pollutants that affect health - Fails to provide monitoring or modeling data on pollutants associated with vehicle traffic, such as particulate matter, ozone, and nitrogen dioxide - Fails to predict future emissions for areas impacted by the project, including future industrial air emissions
Cumulative impacts	- Fails to consider cumulative impacts as defined in the spirit of the EPA definition for the NEPA process - Fails to describe cumulative impacts to each subject area in the REA or the additive effect from combining these individual cumulative impacts - Fails to consider negative cumulative impacts from Alternative A or positive cumulative impacts from other alternatives - States that a Design Overlay Plan will mitigate negative impacts of the extension. However, the Plan is proposed – not adopted – and has not been made available to the public prior to the comment period for the REA
Multi-Modal Access	- Fails to consider negative impacts of Alternative A on multi-modal accessibility from increased vehicle traffic - Does not achieve a stated aim of the project to improve pedestrian and bicycle connectivity by not including sidewalks for the entire length of the extension
Transparency of Data	- Does not provide important data, including: o Impacts to congestion from increased traffic on 2nd Street after the preferred alternative is implemented o Parallel data to compare traffic on Alternative A and other alternatives in 2018 o Data to compare 2035 traffic projections for the same roadway segments under Alternative A and No Build o Air quality monitoring – with the exception of carbon monoxide – or modeling o Data to compare cumulative impacts between Alternative A and other alternatives o Data to compare impacts in multi-modal access for the alternatives o Impacts of the extension to the health and well-being of neighbors living adjacent to the extension, including those it mentions are in six single-family homes located 550 feet north of Alternative A
Alternative Routes Considered	- Insufficiently demonstrates that Alternative A should be the preferred option (*see issues in this table*) - Fails to provide transparent justification for eliminating the TSM/TDM Alternative

Comment on April 2018 Environmental Assessment about proposed Sunport Boulevard Extension and Woodward Road Improvements

Human Impact Partners has reviewed the most recent Environmental Assessment, about the proposed Sunport Boulevard Extension and Woodward Road Improvements, dated April 2018, and finds that the issues we raised in the original comments (as summarized in the table on the previous page) have been inadequately or incompletely addressed.

We continue to urge for the recommendations described in our original comment and report, which were developed by Health Impact Assessment participants, including community members. In particular, we urge for more fully assessing the environmental impacts of the proposed extension on environmental and human health, including reasonable alternatives (including a No Action alternative) that would avoid or minimize adverse impacts or enhance the quality of the human environment.

Should you have any questions, please contact Lili Farhang at 510-452-9442, x101.

Sincerely,

Lili Farhang, MPH
Co-Director
Human Impact Partners

NMELC COMMENTS
APPENDIX
-A-
(3)

U.S. Department of Transportation
Federal Highway Administration

New Mexico Division

4001 Office Court Drive
Suite 801
Santa Fe, NM 87507
505-820-2021

July 21, 2016

In Reply Refer To:
PPM-NM
ENVI 3

SUBJECT: Sunport Boulevard Extension CN A300160
And Woodward Road CN A300161 Environmental Documents

Mr. Tom Church
Cabinet Secretary
New Mexico Department of Transportation
PO Box 1149
Santa Fe, NM 87507

Dear Secretary Church:

The Federal Highway Administration New Mexico Division Office (Division) has received and reviewed the National Environmental Policy Act (NEPA) documents for the Bernalillo County subject projects. The Sunport Boulevard Extension project was analyzed as an Environmental Assessment (EA) for its NEPA consideration, and Bernalillo County via the New Mexico Department of Transportation (Department), has requested a Finding of No Significant Impact (FONSI) for the project. The Woodward Road project was analyzed as a Categorical Exclusion (CE), and final signature from the Division has been requested. The Woodward Road project is discussed as a "co-dependent" project in the Sunport Boulevard Extension EA and noted as an environmental commitment that would be developed as a separate project to be open to traffic prior to the completion of the Sunport Boulevard Extension.

The Division's review of the FONSI request concluded that producing individual projects with separate NEPA documents constitutes a segmentation issue. Segmentation in this respect pertains to an evaluation of the Sunport Boulevard Extension project and its relationship to the Woodward project. Individual NEPA documents for the Sunport Boulevard Extension project and the Woodward Road project is construed as incrementally analyzing impacts materially linked to both projects.

Ultimately, the Division is unable to approve the NEPA decision documents based on the segmentation considerations relative to NEPA procedural requirements. The Division proposes that the information in the Woodward Road CE be combined with the Sunport Boulevard Extension EA and be presented to the public as a single EA at a public hearing. Planning requirements would also call for amending the State Transportation Improvement Program (STIP) to reflect a single project. Several options exist for consideration, as we discussed during the project meeting on Monday, July 18, 2016. Among these options include: pursuing a single

EA as proposed in the preceding paragraph, elevating the NEPA level of effort to an Environmental Impact Statement, or withdrawing the project altogether.

The Division acknowledges the critical link that the Sunport Boulevard Extension comprises in the Interstate 25 South Corridor. We are committed to working with you and Bernalillo County to evaluate the corridor and advance solutions. If you have questions on this matter, please do not hesitate to contact the Division Environmental/Realty Specialist, Greg Heitmann. He can be reached via email at greg.heitmann@dot.gov or by phone at (505) 820-2027.

Sincerely,

Gregory L. Heitmann
Environmental Specialist

For: J. Don Martinez
Division Administrator

cc:
Mr. Blake Roxlau, Environmental Program Manager, NMDOT
Mr. Ken Murphy, P.E., Acting District 3 Engineer, NMDOT
Ms. Priscilla Benavidez, P.E., District 3 Design Manager, NMDOT

September 21, 2015

Mr. Peter Hinckley, URS/AECOM,
6501 Americas Parkway NE, #900
Albuquerque, NM 87110
By email to: peter.hinckley@aecom.com

RE: Critical Comments of SouthWest Organizing Project [SWOP] and Esther and Steven Abeyta on the Bernalillo County-URS/AECOM ["BernCo/URS"] Sunport Extension Project Revised Environmental Assessment ["REA"]

Dear Mr. Hinckley:

New Mexico Environmental Law Center (Jon Block, Staff Attorney) hereby submits the following critical comments on the Sunport Extension project REA on behalf of the SouthWest Organizing Project ["SWOP"] and two representative members of the organization, Esther and Steven Abeyta, who are residents of the San Jose community--a community adjacent to the project that would receive potential project impacts.

SWOP was founded in 1980 by young activists of color to empower communities in the Southwest to achieve racial and gender equality and social and economic justice. SWOP is a multi-racial, membership organization with a Board of Directors elected directly from its membership. SWOP seeks to redefine power relationships by bringing together the collective action, talents, and resources of people within the communities with which it works. These are, primarily, low-income communities of color. SWOP helps these communities take control of their land and resources based upon the notion that all families have the right to healthy, sustainable environments in which to live, work, and play.

Esther Abeyta is former President of the San Jose Neighborhood Association. She and her husband Steven, who are members of SWOP, have been concerned with environmental issues in their community for a number of years. Most recently, they have been working to address issues surrounding the impacts of the Sunport Project on the San Jose community, and cumulative impacts on San Jose from industrial and transportation air pollution.

I. SUMMARY OF OBJECTIONS TO THE REA.

The Bernalillo County/URS ["BernCo/URS]" (Revised) Environmental Assessment dated June 2015 ["REA"] fails to adequately assess and address mitigation of the impacts of the proposed extension of Sunport Boulevard (the "proposed project") on the residents of the San Jose neighborhood and residents of adjacent areas of the Albuquerque's south valley between I-25 and the Rio Grande River (the "project study area" or "project area") in the following significant ways (which are supplemented by additional critical comments after this preliminary section and in the Health Impact Assessment ["HIA"] attached hereto as Exhibit 1):

1. **The REA fails to adequately demonstrate the need for the proposed project and fails to justify having only Alternative 'A' or "No build."** The REA does not support the need for transportation system connectivity, access, congestion relief, improved access to yet to be defined economic centers, or create (within the proposed project) improved pedestrian and bicycle connectivity. There was no true group of alternatives presented to the public in the Environmental Assessment [EA] Process. Alternative 'A' was pre-selected as the sole possible alternative. This choice was made without providing any meaningful cost-benefit analysis to support it. Moreover, the 2015 Revised EA eliminates all of the alternatives presented in the 2010 EA except 'A'--leaving the sole alternatives as "build" (using alternative A) or "no build." *See generally and compare* the 2010 EA *and* the 2015 Revised EA.

2. **The REA fails to assess, evaluate and mitigate the cumulative impacts of the project.** The "codependent" project to improve Woodward Road ("Woodward") is not included or evaluated by the REA. In addition, numerous other related projects are mentioned in relation to the Sunport Extension project, yet there is no cumulative impact analysis of these projects. Furthermore, the assessment of the impacts of the proposed project on the project study area is also flawed and incomplete. An Environmental Impact Statement ("EIS") assessing the cumulative impact of all of these projects—including, but not limited to, enhanced noise, traffic, air quality studies--are necessary to determine whether these projects will significantly affect the human and natural environment, and, if so, what mitigation measures are necessary.

3. **The REA fails to assess the impact of the proposed project on the foreseeable redevelopment of the project study area for industrial use.** No State or local regulations are in place to guide such foreseeable development. The REA does not address the consequences of the unplanned and unregulated industrial development of the project study area. The mitigation of the proposed project's impact on the project study area cannot be evaluated until substantive land use plans and regulations are developed and adopted. An EIS is needed to evaluate the impacts of the yet-to-be-developed plans and regulations. The air quality analysis in the REA only covers

Carbon Monoxide ["CO"] despite complaints from the San Jose community concerning increased diesel emissions from semi trucks, large semi-trailer rigs, tank trucks and heavy equipment trucks. The community has voiced concern about additional chemicals in the already polluted air that will also follow the increase in heavy industrial facilities in the now vacant brownfield areas near San Jose. This is overlooked by the County in its pollution projections. There is no cumulative impact analysis of this likely scenario--and segmenting out Woodward only allows these real impacts to be disregarded in the REA.

4. **The REA fails to address the feasibility, costs and consequences of the proposed project, which has impacts upon two active Superfund remediation sites and at least one historic closed landfill.** Without a defined plan for the required relocation of remediation facilities, and an incursion into an inactive, pre-Resource Conservation and Recovery Act ["RCRA"], i.e., unregulated landfill, it is impossible to gauge the extent of potential impacts the alignment of the proposed project may have on the project study area and, significantly, upon the ongoing required remediation and landfill control efforts. Of particular concern is a potential methane explosion during construction. This poses a substantial occupational and public health and safety risk.

5. **The REA fails to adequately address the impacts upon the environmental justice communities adjacent to the project area.** The REA fails to consider the potential adverse project impacts on the public health and safety of persons residing in the San Jose community. These potential adverse health impacts on an already pollution-burdened environmental justice community are extensively addressed in the attached HIA, the comments, criticisms and recommended findings of which are incorporated by reference (along with the entire study) in these critical comments. *See generally,* HIA, Exhibit 1, attached hereto.

6. **In the course of the REA process, BernCo/URS failed to consider and adapt to the special needs of the residents and families comprising the environmental justice communities around the project study area, denying these communities meaningful public participation in the National Environmental Policy Act ["NEPA"] process for this project.** When dealing with environmental justice communities, particularly communities in which there are English language communication difficulties for many of the residents, additional steps need to be taken to assure that the greatest number of interested persons is able to participate in the NEPA process. BernCo/URS failed to provide adequate notice and an opportunity for public hearing, in part by failing to adequately address the language communication issues, failing to provide Spanish language translations of the REA and relevant documents for the predominantly Spanish-speaking communities, and failing to hold public meetings and hearings at times and locations suited to the needs to working

families. This failure existed throughout the process and should be the basis for the Federal Highway Administration ["FHWA"] directing BernCo/URS to conduct a full-scale EIS on the projects at issue that is designed to be inclusive, given the special needs of the potentially more affected communities.

II. DEFFICIENCIES IN THE REA.

A. Project Purpose and Need Are Lacking In The REA.

1. REA provides no evidence of the need to "fill a gap"— a regional transportation plan is needed.

The REA claims that the project is needed to connect the Sunport to north/south access on Broadway and 2nd and that a "gap" now exists. REA at 7. Yet, such a connector now exists just one mile North of the proposed project. *Id.* at 8. But the proposed "gap" that is allegedly being filled stops before the yet-to-be-approved-and-evaluated improvements to Woodard Road. It then proposes that this new traffic route proceed on minor state highways--Broadway and 2nd--with no plan for improvements on Broadway and 2nd that would bring traffic from I-40 West, thereby creating a real connector which avoids the I-40/I-25 interchange.

Rather than "filling a gap", the proposed project is, plainly, one small piece of a yet-to-be-developed regional transportation plan. Hence, it is premature and not needed now. Moreover, in the context of a "piece" along with the others described in the REA cumulative impacts section, there is a clear indication that the Sunport Extension project is but a segment of a much larger group of projects with unevaluated individual and cumulative impacts.[1] *See generally* section **G** below. Without planning and the assessment of the impacts of an enhanced connection, there is no basis to contend that the proposed project is needed at this time, and it does not fulfill its stated purpose.

2. REA provides no evidence of the need for "improved access".

The stated purpose of the improved access has not been documented. REA at 8. No traffic studies were done to show how congestion might be relieved. No studies were done on whether the proposed project improves access when it proceeds along minor highways and neighborhood streets. The REA claims the traffic study "illustrates certain failing conditions "(LOF- F). REA at 10. In fact, the table shows LOF-

[1] NMDOT and FHWA must realize that the proposed short section of highway from I-25 down Woodward Road--which terminates at the Rio Grande--is intended to be "improved" by a bridge across the river? Given the on-going and scheduled highway improvements for the west side of the river—and the proposed, enormous Santolina development–a bridge would provide a more direct route for delivering road-building materials made in the South Valley (cement, asphalt, etc.) to the projects on the western side of the river.

F on only three (3) of sixteen (16) routes studied. The need to relieve congestion as a purpose of the project has not been established.

There is no evidence provided in the REA to support the purpose of the project delineated therein for "long range connectivity," "completing a link" or to "balance traffic" within the South Valley—or that such purposes will ever be achieved. REA at 10. No study has established that access to "economic centers" will be improved. In fact, no such "economic centers" have even been identified, nor is the impact on the project study area of "enhanced access" been addressed. *See generally* sections **E** and **F** below.

3. The REA provides no evidence to support "secondary needs".

The REA provides no data to support the alleged "secondary" needs for "improved bicycle and pedestrian facilities" and "connectivity" and "emergency access.". REA at 11-12. The REA contains no evaluation of how such alleged improvements will connect to anything outside the proposed project area. The claimed connectivity can only be realized, if at all, with the construction of the Woodward improvements. Ironically, there are not within the scope of the REA. As no firm assurances exist that the "improvements" will be made, these secondary purposes are not needed at this time, nor will the project meet those stated purposes.

B. "No Build" Alternative Inadequately Addressed -- REA §3.2 – at 24.

Since the REA has not established that the needs and purposes of the proposed project will be met, the "No Build" alternative should be adopted. Significantly, the "No Build" alternative, which BernCo/URS offer to the public, contains no analysis of potential positive impacts of not undertaking the project. It comes across to REA readers—as was stated in the Public Hearing in Mountain View on August--as a veiled threat to the affected community: if you do not accept this project your roads will never be upgraded, you will get no curbs or sidewalks, your flooding and drainage issues will not be addressed, you will get no bike lanes, etc. Given the fact that this project, as noted below and in the attached HIA, will result in an increase of noise, traffic and pollution, it is a major defect that the REA lacks any analysis of positive impacts of "No Build" and poses that alternative in solely negative terms. In short, the REA provides no meaningful analysis or even fair representation of the impacts of "No Build."

C. No Evidence In The REA Supports The "Preferred Alternative— It Is Just A *Very Expensive* Road To Nowhere -- REA §3.3 – at 24-25.

After eliminating the other alternatives, the preferred alternative (Alternative A) is a costly one, requiring a grade of 7% (the "maximum" allowable) with twin bridges over the existing AMAFCA South Diversion Channel, twin bridges over Edmunds Street, and a storm drainage system. REA at 25. It also requires land acquisition from

two active Superfund remediation sites and an historic landfill, the relocation of remediation wells and the construction of a "codependent" improvement project on Woodward that is not analyzed in the REA.

The REA states that the Woodward improvements "are **likely** to consist of four travel lanes, along with pedestrian and bicycle facilities.' REA at 29 (emphasis added). No firm plans are in place, nor has the Woodward project been officially agreed to or funded by BernCo. Moreover, the original 1991 EA, an extremely detailed engineering analysis of the alternatives, chose Alternatives D or H--a choice to which the BernCo raised no objection at the time. The engineered projections for the roads, grades and costs of those choices are compared with other alternatives in the 1991 EA--yet BernCo/URS chose not use this comprehensive study as a starting point for the REA. Instead, it raises issues with these alternative as if they were never viable—despite the direct evidence to the contrary contained in the 1991 EA. *Compare* Molzen-Corbin & Associates, *Sunport Transportation Corridor Study - Broadway Boulevard To Albuquerque International Airport - Environmental Assessment* ["1991 EA"] (July 1991) at 3-4 to 3-8; engineering plats Exhibits 1.3, 1.4. 3.14 through 3.27 *with* REA at 5; §3.1 at 21-23.

It is highly unlikely that the analysis and bases for the engineered choice of D or H in 1991 have changed substantially. In fact, given the changed status of what is now the BNSF yard, there could be fewer issues with these previously preferred alternatives than existed at the time they were selected as the best alternatives. At the same time, no consideration is given in the REA for the potential impacts of traffic waiting for train crossings due to the "improvements" to Woodward Road. The "improvements" will use traffic channelization. This is essentially a barrier. Residents utilizing William Street to access Woodward Road will have only one directional option: turn west. When freight trains use the Inter-Modal to move railcars in and out of that facility--a process takes as long as 20 minutes but could be even longer--traffic will be forced to turn on William Street. Traffic seeking an alternative route will be funneled into the San Jose neighborhood. One reason for this is that road channelization will not allow U-turns. Thus, the use of the Woodward Road "improvements" --a necessary segment of the entire Sunport Extension project -- will create additional traffic in the San Jose neighborhood, traffic snarls at the railroad crossing, and dangerous driving by frustrated drivers attempting to find a way to turn East.

With no evidence in the REA as to how or when this costly one-half mile road will serve area-wide transportation needs, the proposed project remains premature, lacking the necessary connection to area-wide transportation needs to justify the cost and expense of the project.

D. REA Inadequately Addresses Environment, Effects and Mitigations.

1. Air Quality is inadequately addressed – §4.10.

Air Quality data for CO was only obtained south of the project area and not within it. REA at 44-45. Air Quality baseline data for the project study area should be established and modeling done to measure the impact of the proposed project. The REA states that the modeling done demonstrates that the project development "would not cause or contribute to air quality exceedances." *Id.* at 46. This in no way measures the air quality impacts upon the residents of the project study area due to increased traffic the REA concedes will occur. *Id.* at 28. No assessment is made of the impact of increased truck traffic to and from foreseeable industrial development in the study area. An EIS is needed to make this assessment and to pose and evaluate possible mitigation measures-- such as the regulation of truck routes and truck weight limitations. *See also* HIA at iv, 24. The REA relies solely on area-wide regulation of transportation related pollutants. REA at 46. This in no way addresses the site-specific impacts of increased traffic on the project area. As no assessment has been made, no mitigation alternatives have been posed and analyzed. This needs to be done in an EIS for the proposed project, the projected Woodward improvements, and all of the related and reasonably foreseeable projects. *See* section **G** below (addressing cumulative impacts).

Similarly, the REA does not address the impacts of toxic pollutants on the project study area. Instead, it relies solely on area-wide modeling. The REA states, in pertinent part, that, "under the build and no build scenarios there may be localized areas where VMT [Vehicle Miles Traveled] would increase...and therefore it is possible increases and decreases in MSAT [Mobile Source Air Toxics] may occur." *Id.* at 48. Without supporting these assertions with data, the REA merely conjectures where increases and decreases might occur in the study area, then asserts "even where increases do occur, they will be substantially reduced in the future due to the implementation of EPA's vehicle and fuel regulation." If this were in fact true, the conclusion only pertains to the metropolitan area. There is no data to supporting this conclusion--and no modeling to indicate that such a forecast can be said to apply—in relation to a particular neighborhood facing increased traffic and new development by heavy, polluting industries. An EIS must be conducted to evaluate the impacts of this situation upon the communities that are near the project area. It should include a site-specific analysis assessing the potential for increased toxic air pollutants that would affect a population that already receives a disproportionate share of the impacts of "discharged pollutants." HIP at iv-v, 6.

2. Noise inadequately addressed --REA §4.11 at 49

The REA noise impact analysis and related traffic projections were performed on within an extremely limited site-specific portion of the project area. No area-wide

analysis was performed. There is no evaluation of the noise impacts related to the Woodward project—or the many other projects connected to the Sunport Extension Project. *See* **G** below (cumulative impacts). The modeling that was done addresses the intersections affecting only nine (9) residences. Even that highly restricted study reveals noise levels exceeding 67dBA in two (2) out of six (6) samples. In all cases, undertaking the proposed project results in noise levels that are higher than those under the "no build" alternative. Yet, the REA neither provides nor evaluates any mitigation measures. In some cases, the REA concedes that there are no viable mitigation measures. REA at 51. In an utterly bizarre twist, the described traffic analysis reaches the conclusion that these nine (9) residences will suffer increased noise from increased traffic on Broadway rather than from the proposed project. REA at 50. This is no way addresses the impacts of the proposed project and the conceded increased traffic it will generate in the project study area as a whole. Nor does it evaluate the noise impacts of the Woodward improvements, other scheduled and reasonably foreseeable road projects, and the foreseeable industrial redevelopment that have been "segmented" out of the scope of the project. *See* **G** below (discussing segmentation). An EIS with a noise analysis that includes the noise impacts of all of this development needs to be conducted and it needs to include, as Category B receptors, the San Jose residences along Bethel Avenue, that is, west of Broadway and north of the proposed project. REA at 62.

The REA points out that BernCo code does not specify noise limits for transportation source. Absent such limits, coupled with effective truck restrictions and related controls, noise mitigation cannot be achieved. BernCo needs to implement effective land use and transportation codes through comprehensive planning for the industrial redevelopment likely to result from the proposed project. These should be required to be in place prior to the FHWA and NMDOT approving any federally funded road project in this area.

E. Communities and Use Inadequately Addressed -- REA §4.13 at 54-56.

The REA states that the preferred alternative is consistent with existing and proposed land use plans. REA at 54. However, none of the approved land use plans directly address the project study area. The REA concedes that the plan referred to--Bernalillo County/International Sunport Area Plan--is south of the project study area. The REA relies on a yet-to-be approved and adopted Design Overlay Plan. No such proposed overlay plan was available to the public prior to or during the Public Hearing and is not part of the REA. The REA offers this yet-to-be approved and adopted plan as evidence of both compliance with existing plans and as a mitigating factor in the implementation of the proposed project.

Despite frequent summaries of its content, no copy of the proposed plan is included in the REA and, significantly, was not part of the public process on the REA. The REA claims that the Design Overlay Plan provides standards and guidelines for "architectural character, building design, parking and access, and landscaping, fencing and walls; lighting and signage...." REA at 56. These are merely aesthetic and design regulations. They do not and cannot address the issues of increased noise, air pollution and disparate land uses that will accompany the industrial redevelopment of the project area absent a zoning classification change. The zoning in the area has not been updated in many years and favors highly industrial, polluting uses. Although the REA admits that, "while the zoning will articulate the allowable uses" it "cannot be predicted with certainty whether or what businesses might move to the area...." REA at 62.

As noted in comments to the earlier draft REA, Gregory Heitmann, FHWA, in his letter dated May 23, 2014 to Blake Roxlau, New Mexico Department of Transportation ["NMDOT"], stated, in pertinent part, "The Design Overlay may have a positive impact but they are not enacted. Also, what if they don't work? Isn't the Design Overlay a voluntary program with incentives? The REA acknowledges that the design overlay is strictly voluntary. REA at 55.

No protections are in place or being implemented to prevent the project study area from repeating its history of "unsightly vacant land and legacy industrial uses." REA at 62. Without changing zoning, "overlays" are no more effective in eliminating heavy industrial eyesores than is lipstick used to "beautify" a pig.

Bernalillo County has the authority and resources to adopt substantive controls such as a revised land use plan specifying coherent requirements for locating new industrial uses, traffic flow restrictions including weight limits, and noise controls including operating hour restriction for truck traffic and loading dock operations.

To effectively deal with these issues, BernCo must prepare an EIS for the proposed project, the Woodward improvements, the numerous other related projects listed in the REA cumulative impacts section, and the reasonably foreseeable project that will follow all of these. BernCo also needs make an advance and firm funding commitment that include money for the development of a comprehensive land use plan and the re-zoning of the project study area. These should be implemented prior to FHWA and NMDOT approval for the undertaking any of these projects.

F. Indirect and Cumulative Impacts Inadequately Addressed - REA § § 4.22 & 4.23 – at 70-79.

The REA is flawed in failing to address indirect and cumulative impacts because it fails to assess the impacts of the Woodward improvements and all of the other known and reasonably foreseeable regional highway improvements that will have a significant

environmental impact on the project study area, and which flow from the Sunport Extension project. The REA cites federal regulations that define indirect impacts as "project effects that occur later in time or away from the immediate project area" (REA at 74). It makes no mention here of the "codependent" Woodward improvements which would abut the proposed project. Furthermore, the impacts of the Woodward project on the Sunport project have not been assessed. REA at 74-76.

Failure to include the Woodward improvements, the other already approved and scheduled projects, and other reasonably foreseeable future regional highway improvements within a cumulative impact evaluation, violates the intent, if not the substance, of Federal Highway Administration (FHWA) directives and guidelines. In his letter of January 28, 2015, Blake Roxlau, NMDOT, "in consultation with the FHWA" insisted upon certain "conditions" BernCo/URS had to meet to "ensure that the Sunport Blvd. [R]EA is completed adequately." He further stated, in pertinent part, "An analysis of traffic impacts to Woodward and specific mitigation plans shall be included in the [R]EA". This has not been done. Instead, the REA references the Environmental Commitment in Section 5 of the REA. REA at 76-77. That section simply asserts that a "stand alone" NEPA document will be prepared for the Woodward improvements the effort associated with it will be a Categorical Exclusion ["CE"]. This entirely schematic and superficial treatment of the requirements set out by the FHWA (and passed on to BernCo/URS by the NMDOT) is a major deficiency in the REA and shows that this project is "not ready for prime time".

Mr. Roxlau also required, in pertinent part, that, "The project termini shall be described in the [R]EA and include all Woodward Ave. improvements." This is consistent with FHWA guidance in *Development and Evaluation of Alternatives*[2] requiring that an EIS or FONSI "connect logical termini and be of sufficient length to address environmental matters on a broad scope" and "have independent utility or independent significance". *See generally*, FHWA Environmental Review Toolkit - NEPA and Transportation Decisionmaking.[3] This has not been done here and violates the intent of FHWA guidance on "segmentation" whereby smaller projects are evaluated separately without considering the cumulative impacts of the related foreseeable or, in this case, "codependent" projects.

Mr. Roxlau also stated that a "signed agreement between the County and City of Albuquerque shall be completed that outlines jurisdiction and maintenance responsibilities for Woodward Ave. This agreement shall include a commitment to fund the Woodward improvements and outline sources of funding". This agreement is not in place. Existing correspondence does not evidence a legal agreement by the

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[2] https://www.environment.fhwa.dot.gov/projdev/tdmalts.asp (accessed September 18, 2015).

[3] https://www.environment.fhwa.dot.gov/projdev/pd3tdm.asp (accessed September 18, 2015).

respective authorities of the two governing bodies to fund and maintain the Woodward improvements. Agreements to agree by lesser public officials do not constitute the City-County Memorandum of Understanding ["MOU"] that Mr. Roxlau (and Mr. Heitmann of the FHWA) stated as one of the necessary requirements prior to approvals and construction on Woodward Road—which they also state must be completed prior to the Sunport Extension project.

The REA fails to meet both explicit requirements and the directives of the FHWA. Thus, it cannot be the basis for a FONSI. An EIS must be prepared which demonstrates that all these requirements have been met, else the project would not be approved. Moreover, the REA fails to assess "the incremental impact of an action when added to other past, present or reasonably foreseeable actions regardless of what agency or person undertakes such action. REA at 76 (citing 40 CFR 1508.8(b)). As it stands now, the REA does not meet the Council on Environmental Quality ("CEQ") requirements under the NEPA for addressing cumulative impacts. BernCo/URS need to conduct a full-scale EIS to correct that deficiency.

G. Project Segmentation And Inadequate Cumulative Impact Analysis.

The fact that the REA forecasts that the Woodward analysis will be conducted as a CE further illustrates that a non-cumulative segmentation of two interdependent projects is underway. According to FHWA guidance a CE is <u>not appropriate</u> where there are "significant environmental impacts "and/or "substantial controversy on environmental grounds." 23 CFR 771.117(b)(1) and (2); *see also,* FHWA - NEPA Toolkit.[4]

The White House CEQ guidance dated November 23, 2010 calls for a CE to be supported by documentation showing that similar actions in the past have not produced significant impacts. It encourages agencies to review their CE issuances. The United States Department of Transportation has done that as part of a study completed November 27, 2012 (FHWA Publication No. FWHA-HEP 13-003). That study surveys the recent history of CE issuances under 23 CFR 77.117 (c) and (d). An examination of the survey reveals that CE issuances constitute 90% to 99% of the NEPA decisions in transportation programs of the majority of State DOTs and transit activities. <u>However, none of the activities approved through the use of CE's by State agencies would cover the magnitude of the improvements contemplated by the Woodward project</u>. When coupled with the proposed project, the use of a CE is clearly inappropriate. Moreover, <u>it is also questionable as to whether a CE is appropriate in a project area--such as Woodward Road—where there is a documented history of improper hazardous waste disposal and a closed, unregulated landfill</u>.

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[4] https://www.environment.fhwa.dot.gov/projdev/docuce.asp (accessed September 18, 2015).

Significantly, whether by design or not, a separate EA for the proposed project and a CE on the adjacent necessary interdependent Woodward improvements assures that, through segmentation, the cumulative impact of these two projects will not the examined.

Within the REA cumulative impacts section, there are a host of related projects without any analysis of the cumulative impacts of these projects, individually and collectively, upon the communities adjacent to the project area. Among these are the following funded and near-term projects, which are, clearly, directly related to the Sunport Extension project and the Woodward Road project, yet cumulative impacts have not been analyzed—and this is only list of the approved projects:

- 2nd Street, County Line to Woodward Bike/Ped facilities (Late term)
- 2nd Street, Sandia Salida to Woodward Multi-use Trail (Near term Phase 1 funded)
- San Jose Drain, Rio Bravo to Woodward Bike/Ped facilities (Near term)
- S. Diversion Channel, Rio Bravo to Gibson Bike/Ped facilities (Late term)
- University Blvd, Rio Bravo to Gibson Bike/Ped facilities (Funded)
- 2nd Street, Sandia Salida to Woodward Roadway improvements (Near term)
- I-25/Gibson Interchange reconstruction (Near term)
- 2nd Street/Rio Bravo Intersection improvements (Near term)
- Rio Bravo, Coors to University Adaptive traffic signals (Near term)
- I-25, Sunport to Gibson Auxiliary Lanes(Funded)
- NMRX Railroad, Crossing Broadway Safety improvements (Funded)

The proposed project and the Woodward improvements should be part of an EIS which includes both projects and assesses the cumulative impacts of both projects as well as all of the other transportation projects described in the REA § 4.23 and those reasonably foreseeable as a consequence of going forward on all these projects.

H. Inadequate Consideration Of Superfund Sites, Landfills, Hazardous Materials -- §4.20 at 68-73.

1. The REA does not assess potential hazardous waste impacts.

The REA fails to assess the impact the proposed project will have on ongoing remediation at the GE site, the Chevron site, and the Schwartzman landfill. There is neither evidence the project area is "ready for reuse" under the Superfund Redevelopment Initiative, nor is there a plans to fund projects to support the reuse or development of a Master Plan for redevelopment. REA at 73.

The original City of Albuquerque Environmental Assessment for the Sunport Transportation Corridor (1991) recognized that there were a variety of environmental hazards associated with the landfills, superfund sites, and the properties that would be in within the right-of-ways of the various proposed roads across I-25 and into the South Valley. The study includes detailed plats of these issues as well as a chart showing each type of problem with a reference number to the plat. *See* 1991 EA at Exhibits 4.9 and 4.11. There was also an additional study conducted to assay the "impaired" properties traversed by the chosen route. Marron, Taschek & Knight, Inc., *Supplemental Report on the Identification of Potentially Impaired Properties Along The D, H, and B Alternatives of the Sunport Project Area* (June 1991).[5]

No assessment has been made regarding the feasibility, cost or potential consequences of intruding on these sites. In fact, the Initial Site Assessment takes note (without analyzing or referencing any research or actual data) of the existence of hazardous waste issues throughout the project area. *See* Sunport Boulevard Extension, Phase 1 Initial Assessment (June 9, 2010) at 4-4 through 4-10. This listing of items in the EDR and RCRA CORRACTS databases--when taken in light of the earlier studies of the site for the 1991 EA--indicates that there are very serious potential public health and safety hazards involved in this project that should be fully analyzed under an EIS.

As should be clear from both these references, Woodward Road is also known to have hazardous materials on the properties and, potentially, in the construction right-of-way. These, too, will not be assayed properly absent an EIS including Woodward Road (and any scheduled or reasonably foreseeable projects that have potential hazardous waste issues). Caution in dealing with the historic conditions of the project area—much of which was occupied by an unregulated landfill and may contain methane gas—is imperative to assuring occupational and public and health and safety.

2. South Valley Superfund Remediation System Inadequately Addressed -- REA at 71-72.

Here, the REA calls for avoidance of wells "where possible" and projects that, prior to any specific design, the proposed project will, with regard to one monitoring well, "space over the well," and that access to the well for maintenance will not be

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[5] As noted above, the 1991 EA recommended a D/H alternative--a route BernCo/URS rejects in the REA, yet one to which the County had no objection in 1991. It is a southern route with intersections on Broadway. Significantly, Woodward Road (Alternative 'C') was considered in 1991 and rejected at the preliminary phase. *Compare* 1991 EA at 1-7 to 1-11, 2-1 to 3-8, Exhibits 1.3 and 1.4, Exhibits 3.14 to 3.27 (engineering analysis showing D & H viable); *and* REA at 5 and §3.1, at 21-23; *with* City of Albuquerque, *Responses to Comments on the Environmental Assessment and Study Recommendations - Sunport Transportation Corridor Study* (September 1991).

affected. There is no evidence that this can be accomplished nor is there any discussion of which remediation water lines and wells will be relocated, what the costs might be, and whether it could adversely affect the remediation system as a whole. The REA states that this will be done "per guidance by GE and EPA." REA at 72 and 83.

The REA asserts that planning for these unknown impacts has occurred by meetings between the parties. But examination of the referenced "Appendix B-Superfund Stakeholder Meeting Minutes" reveals that no coordinated effort has been undertaken to assess the relocation of the remediation lines and wells or the impact on the landfill site. The minutes of the April 1, 2010 meeting list numerous "action items" none of which are produced or evaluated in the REA. Similarly, the minutes of the December 13, 2010 meeting, entitled "Location Facility on **Woodward Avenue**" (emphasis added), lists a host of issues to be resolved, and which call for generalized assurances to be forwarded to EPA. REA Appendix B, 2d page of minutes, item VI(h). Although some preliminary cost estimates were prepared, many issues remain unresolved. The actual projections are vague. REA Appendix B (January 12, 2011, Email from John Billiard to Roxanne Blatz).

Based on this incomplete record, EPA issued a letter dated April 5, 2010, "acknowledging" that the County of Bernalillo has met with GE representatives and identified various items...." REA Appendix A. Although EPA goes on to say that the County "has made due diligence **to date,**" the letter, from Michael Hebert, EPA Region 6, Remedial Project Manager, completely fails to examine any of the specific efforts undertaken (or those undertaken and not completed) nor does it constitute an affirmative declaration that the proposed project will not have a significant environmental impact on the project study area and its residents. *Id.* (emphasis added). The information offered regarding the GE site clearly demonstrates that an EIS is required to assess the yet undisclosed remediation facility reconfiguration and its impact.

3. Inadequate analysis on impacts to or from the Chevron site.

Based on the REA, the impacts of and on the wells associated with the former Chevron bulk fuels terminal have not been adequately planned. Such impacts as might result cannot be assessed. Chevron may or may not request formal closure of the remediation site. REA at 72. The sole analysis of possible impacts is found in the referenced minutes to the Superfund Stakeholder meeting. Those minutes indicate uncompleted tasks, incomplete coordination, and no firm mitigation plans. For example, in the minutes of December 13, 2010, it states "The Department of Defense and Department of Energy will need to be informed." REA, Appendix B, 2d page of minutes, IV (f). There is no evidence this has been done or what the results of such a consultation might entail.

It is clear that there is one active well (designated HL-02) south of the proposed alignment. How the project may have an impact upon the well is not addressed except to say that it will be "protected." REA at 72. Significantly, and contrary to this assertion in the REA, the letter of April 5, 2011 from the EPA makes no reference to the Chevron facility (or the Schwartzman Landfill) and only addresses the GE site. Hebert letter, *supra*, REA Appendix A. The EPA has not reviewed this aspect of the proposed project and an EIS should be prepared to disclose the potential impacts and mitigation measures needed to protect this remediation facility and safeguard and protect the residents of the neighborhood and the South Valley.

4. No assessment of closed landfill impacts -- REA at 73-74.

The REA is devoid of any assessment of the impact intrusions by the proposed project will have on the Schwartzman Landfill. A study of such impacts apparently must wait for a Preliminary Design Assessment that will only take place immediately prior to construction. This lack of analysis comes despite the fact that the representative of the Landfill whom the County consulted stated, in pertinent part, "there is not a well defined boundary", and that testing would be required to look for residual waste, and that utility work must follow Landfill Interim Guidelines "in order to prevent landfill gas migration". Initial Site Assessment Update at 4-3 (reporting conversation with Suzanne Busch).

It is unclear whether the Interim Guidelines can address the potential for gas migration to an adjacent superfund remediation site or are capable of dealing with other unknown consequences that will follow upon opening a closed landfill containing undetermined waste. The REA does not address this issue. It should be assessed in an EIS. As mentioned earlier, this is a serious issue given the potential adverse consequences to occupational and public health and safety due to a construction-related methane gas explosion. Failure to conduct any analysis of the impacts of intruding into a closed, pre-RCRA, unregulated and undefined landfill clearly ignores significant potential adverse environmental impacts within the project area and provides a compelling reason for a full-scale EIS on this project, Woodward and all related ones.

I. REA Fails To Consider Adverse Health Impacts.

The Health Impact Assessment attached hereto as Exhibit 1, and incorporated by reference herein as part of and supplementing these critical comments on the Sunport Extension project, sets out specific findings on adverse, unconsidered or improperly evaluated health impacts of the proposed project. These are summarized in the following table:

Summary Table: Significant Issues with the Revised Environmental Assessment (REA)	
Traffic congestion	- Evidence does not support or is insufficient to support the stated purpose and need for the extension to relieve congestion - Data generally demonstrates traffic volumes have stayed the same or decreased in recent years - The REA recommends building the extension even though data it provides suggests benefits if the extension is not built compared to if Alternative A is built. These benefits include: 1) greater reduction in vehicles for roadways predicted to have poor Level of Service in 2035 and 2) less traffic in 2035 for a segment of 2nd Street south of Woodward Rd – an important segment where increased volumes could contribute to new congestion, which the REA does not discuss - Data is inconsistent or absent; for example: 1) using different roadway segments in tables that model 2035 data for the No Build Alternative and Alternative A and 2) providing projected 2018 traffic volumes only for Alternative A, but not other alternatives - Fails to provide substantive data on how improved access to economic centers will further contribute to vehicle traffic
Air quality	- Fails to provide data on the amount or type of emissions permitted for sources in the neighborhood today, where a Health Impact Assessment found residents who make up less than one percent of the city's population bear much greater shares – from six to 11% – of permitted levels for seven pollutants that affect health - Fails to provide monitoring or modeling data on pollutants associated with vehicle traffic, such as particulate matter, ozone, and nitrogen dioxide - Fails to predict future emissions for areas impacted by the project, including future industrial air emissions
Cumulative impacts	- Fails to consider cumulative impacts as defined in the spirit of the EPA definition for the NEPA process - Fails to describe cumulative impacts to each subject area in the REA or the additive effect from combining these individual cumulative impacts - Fails to consider negative cumulative impacts from Alternative A or positive cumulative impacts from other alternatives - States that a Design Overlay Plan will mitigate negative impacts of the extension. However, the Plan is proposed – not adopted – and has not been made available to the public prior to the comment period for the REA
Multi-Modal Access	- Fails to consider negative impacts of Alternative A on multi-modal accessibility from increased vehicle traffic - Does not achieve a stated aim of the project to improve pedestrian and bicycle connectivity by not including sidewalks for the entire length of the extension
Transparency of Data	- Does not provide important data, including: o Impacts to congestion from increased traffic on 2nd Street after the preferred alternative is implemented o Parallel data to compare traffic on Alternative A and other alternatives in 2018 o Data to compare 2035 traffic projections for the same roadway segments under Alternative A and No Build o Air quality monitoring – with the exception of carbon monoxide – or modeling o Data to compare cumulative impacts between Alternative A and other alternatives o Data to compare impacts in multi-modal access for the alternatives o Impacts of the extension to the health and well-being of neighbors living adjacent to the extension, including those it mentions are in six single-family homes located 550 feet north of Alternative A
Alternative Routes Considered	- Insufficiently demonstrates that Alternative A should be the preferred option (*see issues in this table*) - Fails to provide transparent justification for eliminating the TSM/TDM Alternative

J. REA's Consideration of Environmental Justice Is Inadequate.

Although the REA notes that San Jose is a low-income, minority community and has some of the highest concentrations of low-income, minority residents in the South Valley, the REA does not even take cognizance of this fact as indicative of there being more severe economic and environmental justice impacts on this community--and then actually looking at them in relation to the project at issue. While the REA acknowledges that San Jose is a community subject to special consideration of environmental justice issues, the entire REA §4.14 merely makes blanket descriptive statements without any substantive analysis of the potential impacts of the Sunport Project upon the residents of San Jose and Mountain View. It is they who already suffer disproportionately adverse environmental conditions as compared to persons living in other Albuquerque communities.

This lack of substance is telling: not only is there no analysis and discussion of existing data showing adverse health conditions on persons living in San Jose, there is no discussion of the adverse impacts which BernCo/URS admit will exist due to this project--increased traffic, noise, and related pollution. This is discussed in more detail within the HIA incorporated in these comments. *See generally*, HIA attached hereto. At the same time, the shallowness and inadequacy of the REA is highlighted in this regard where the authors note that there is data showing the adverse health conditions in the San Jose community.

This failure of BernCo/URS to properly consider the San Jose community was no sudden change or temporary lapse. From the inception of EA process--when the San Jose Neighborhood association was not invited to participate in meetings and notices were sent to someone who was neither a member of the organization or its leadership--through a series of meetings with the community which were on short notice, held at times when working people had difficulty attending, discussed documents not translated into Spanish, did not allow people to ask questions or comment, and, ultimately, a Title VI investigation of the BernCo/URS conduct of the NEPA process---all of which and more is properly part of the record of this project--BernCo/URS has shown defensiveness, hostility and a lack of respect for the people of San Jose.

The REA acknowledges San Jose and Mountain View as environmental justice communities and cites health statistics from the 2011 Place Matters HIA, stating, in pertinent part, "There have been demonstrated community and public health concerns in San Jose and Mountain View." REA at 57. Yet, other than observing these statements to be facts, it does nothing with them--it does not review or analyze them to see what can be learned about the health of these communities and then relate that information to the proposed project impacts. The intention of the NEPA is to require a public process in which agencies at all levels of government cooperate to provide the decision-

maker with the information necessary to give a hard look at the effects of federally funded, undertaken, or permitted actions upon the human and natural environment. The intention was that there be adequate information to take such a hard look rather than hardly looking at all as is the case with the REA.

The REA notes that public health improvements will come with sidewalks and bike lanes on Woodward. REA at 63. However, there is no analysis of the potential *adverse* health and safety impacts of increased foot and bicycle traffic along a street that will be filled with semi-trucks, double and triple semi-trailers, oil tank trucks, heavy equipment trucks and a variety of other vehicle traffic in an area that already has air carrying cement dust, asphalt related chemicals and other petrochemicals, as well as pm2 through pm10 particulates. The REA gives no consideration to the negative health and safety impacts of the project that creates this situation.

The REA states, in pertinent part, "There are transportation facility concerns that impact public health. Sunport Blvd. and Woodward Rd. lack facilities for pedestrians and non-motorized vehicle use. There are no sidewalk or bike lanes." *Id.* at 58. Yet, as the community already told BernCo in earlier comments, bike lanes and sidewalks--on a highway with a steep grade and many 18-wheelers--are not safe options for bikers or pedestrians. Moreover, there is no reason why constructing such facilities could not take place without a Sunport Extension project. *See, e.g.* REA at 62, stating in pertinent part, "No change to existing conditions would occur with "No Build"--which is no more than a veiled threat: if you do not support this project, you do not get any improvements—no improved drainage, no curbs, no sidewalks, no bike lanes.

Why should it take a highway project to provide an environmental justice community with sidewalks and bike lanes--and perhaps even locate these in a manner that improves public health and safety rather than further jeopardizing it by bringing in more pollution from heavy industries and traffic?

Executive Order ["EO"] 13045, Protection of Children From Environmental Health and Safety Risks, requires federal agencies -- such as the Department of Transportation -- to access health risks to children. The Sunport Extension project REA does not access risks. The REA states that East San Jose Elementary would not experience an environmental health and safety risk from the project that would have a disproportionate impact upon the children. REA at 58. However there is no assessment or data to back up this assertion. The Department of Transportation, as an agency subject to EO13045, has an obligation to require more than such blanket assertions where there may be health and safety risks to children. An Environmental Impact Study of the project would properly include the necessary data collection and a proper assessment.

EO 13166 addresses the need for federal agencies to provide access to persons with limited English proficiency. The BernCo/URS EA and REA process failed to provide access to persons with limited English proficiency, especially at the public hearing on the REA and the public meeting held in San Jose. REA at 58. No translation of the entire REA and related documents was available to persons for a reasonable period of time prior to an adequately noticed public hearing.[6]

Providing only the executive summary of an over 500-page document in one's first language is like being told you have to sit at the back of the bus. Moreover, holding meetings on short notice, during the dinner hour of working families--many of which have both parents working different shifts, many of whom have English as a second language and low-levels of English language proficiency—does not meet the intentions CEQ guidelines for conducting such meetings, nor the intention of EO 13166—or the Congressional intentions underlying the NEPA. In fact, whether by design or not, the net effect of such actions is to shut out a large portion of the population from the communities which would received the greatest adverse impacts of the project at issue and are already receiving disproportionately large adverse environmental impacts from nearby heavy, polluting industry and superfund sites. The working residents of San Jose and Mountain View—no matter where they are from, no matter what language is their first language--deserve to receive the same notice and opportunity to be heard that would, no doubt, be accorded to residents of the more affluent Albuquerque neighborhoods.

The REA attempts to minimize (unfortunately in words only) the potential adverse impacts that will follow on the Sunport Extension and Woodward Road projects. REA at 62. The language used, however, notes that San Jose is an industrial area and that BernCo/URS cannot guarantee the type of business that will move into the area as the result of the development. It also says that overlay zoning "may" result in positive impacts. However, overlay zoning—requiring the *voluntary* beautification of a chlorine gas plant parking lot or the façade of petrochemical plant is no more effective in mitigating the odors than painting flowers on a pigsty. It is also important to note that even if it were substantive, the overlay zoning referred to in the REA has not been approved--it is just window-dressing to make it *appear* that BernCo/URS plan to mitigate impacts on the affected communities.

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[6] The transcript of the August 2015 Public Hearing held in Mountain View is also replete with citizen complaints—as well as those of elected officials and past and present community leaders pointing out the lack of notice, document availability, time to read the key documents, and the lack of a public hearing held in San Jose on the revised, substantially enlarged EA.

Without going through the public approval process for overlay zoning, going through that same process to change the existing industrial zoning, or even obtaining agreements from "brown field" property owners to put covenants in their respective deeds limiting the uses to no more than light, non-polluting industry--the BernCo/URS plans will just place more adverse environmental impacts upon the already disproportionately burdened environmental justice communities that will receive the brunt of the Sunport Extension, Woodward Road and numerous other related and reasonably foreseeable projects that flow from the Sunport project.

The bottom line is that only a full-scale Environmental Impact Study could, at this stage, provide an opportunity for people in the most affected communities to have a voice in shaping these projects--and provide them with an opportunity to find ways to mitigate the additional adverse impacts on their already burdened communities.

III. CONCLUSIONS

The REA "Conclusions" are incorrect. REA at 89-90. The foregoing critical review and that in the HIA reveal, in pertinent part, but not limited to, the following:

1. The REA fails to adequately demonstrate the need for the proposed project; therefore, the "No Build" alternative should be selected;

2. The conclusion that yet-to-be specified avoidance and mitigation techniques would not significantly impact groundwater, hazardous materials or remediation efforts underway in the superfund sites and adjacent properties within the project area, is not supported by the analysis done to date; an EIS is required and necessary to perform this analysis;

3. The reliance on yet to be determined projected Woodward improvements, where no firm agreements exist and where no cumulative analysis of the codependent project has been completed, necessitates an EIS which assesses the cumulative impact of both projects taken together;

4. The air quality analysis fails to consider hazardous air pollutants and cumulative impacts of air pollutants, does not adequately address CO "hot spots", is limited to the project study area, and places unwarranted reliance on area-wide air quality controls. A comprehensive air quality analysis needs to be performed as part of an EIS to determine whether there are significant air quality impacts from the projects;

5. No land use plan or transportation related regulations exist to mitigate the potential for significant adverse environmental impacts associated with what is a foreseeable reindustrialization of a neighborhood already burdened with a "legacy" of heavy, polluting industrial uses;

6. It is patent that the environmental justice considerations dovetail with adequate consideration and analysis of the cumulative impacts of the proposed projects. By artificially dividing the project into two parts (which even the project proponents describe as "co-dependent"), it is evident that what should properly be recognized as a single project has been segmented to avoid an adequate analysis of the impacts of the whole project upon the residents of nearby communities. These communities are recognized—even within the REA—as already burdened by economic disadvantages, air pollution, noise, adverse health impacts, lack of sidewalks, traffic controls, and situated in an area zoned to allow heavy, polluting industries. Moreover, the REA indicates that there are a number of other road projects in the works —projects the REA links to the project at issue and the Woodward project—yet, significantly, it makes no attempt to analyze the direct, indirect, individual and cumulative impacts of these projects upon the residents of the adjacent communities.

From the foregoing, the FHWA should conclude with that either this project should not be built, or that a full-scale environmental impact study is necessary.

Respectfully submitted:

SOUTHWEST ORGANIZING PROJECT
&
ESTHER AND STEVEN ABEYTA

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Incorporated attachment:
Exhibit 1, Health Impact Assessment of Sunport Project

HUMAN IMPACT PARTNERS

September 21, 2015

Dear reader:

This document summarizes: 1) significant issues that are insufficiently addressed in the revised Environmental Assessment for the proposed Sunport Boulevard extension and 2) relevant key findings from a Health Impact Assessment (HIA) of the proposed extension.

Human Impact Partners conducted the HIA with residents of the San Jose neighborhood, local advocacy organizations, and the New Mexico Department of Health, from June to November 2013. The draft HIA analyzed Bernalillo County's first publicly available Environmental Assessment for the Sunport Boulevard extension project, which was released in September 2011, in anticipation of an expected public comment period. However, the comment period was postponed, and nearly two years later in July 2015, the county released a revised Environmental Assessment (REA). After a review of the REA, the HIA report was finalized in September 2015. Although updated data for measures gathered in 2013 for the HIA may be available, the data presented in the HIA remains valid and supports the findings described in this summary. The full HIA follows this summary.

Please contact Sara Satinsky at 510-452-9442, ext. 104 should you have any questions.

Sincerely,

Sara Satinsky, MPH, MCRP
Senior Research Associate
Human Impact Partners

SUMMARY OF SIGNIFICANT ISSUES

The Bernalillo County Public Works Division is proposing to extend Sunport Boulevard from its current end at Interstate 25 to the intersection of Broadway Boulevard and Woodward Road. However, residents of the San Jose neighborhood are concerned that the project, planned as a four-lane divided highway connecting to roads that go through the neighborhood, will increase traffic, harming their health and well-being.

The neighborhood of about 4,000 people in south Albuquerque already bears a disproportionate environmental burden, from past hazardous chemicals and other materials that contaminated soil and water, and air pollution from traffic and industry. San Jose is racially and ethnically diverse, younger, with lower income and higher unemployment than the county as a whole, and meets the U.S. Environmental Protection Agency's criteria for an environmental justice neighborhood. The neighborhood is in an area that has among the highest death rates in the county from several health conditions, including cancer, diabetes, and conditions related to heart disease.

Findings

The summary table below lists significant issues with the revised Environmental Assessment (REA) that are described in this document.

Summary Table: Significant Issues with the Revised Environmental Assessment (REA)	
Traffic congestion	- Evidence does not support or is insufficient to support the stated purpose and need for the extension to relieve congestion - Data generally demonstrates traffic volumes have stayed the same or decreased in recent years - The REA recommends building the extension even though data it provides suggests benefits if the extension is not built compared to if Alternative A is built. These benefits include: 1) greater reduction in vehicles for roadways predicted to have poor Level of Service in 2035 and 2) less traffic in 2035 for a segment of 2nd Street south of Woodward Rd – an important segment where increased volumes could contribute to new congestion, which the REA does not discuss - Data is inconsistent or absent; for example: 1) using different roadway segments in tables that model 2035 data for the No Build Alternative and Alternative A and 2) providing projected 2018 traffic volumes only for Alternative A, but not other alternatives - Fails to provide substantive data on how improved access to economic centers will further contribute to vehicle traffic
Air quality	- Fails to provide data on the amount or type of emissions permitted for sources in the neighborhood today, where a Health Impact Assessment found residents who make up less than one percent of the city's population bear much greater shares – from six to 11% – of permitted levels for seven pollutants that affect health - Fails to provide monitoring or modeling data on pollutants associated with vehicle traffic, such as particulate matter, ozone, and nitrogen dioxide - Fails to predict future emissions for areas impacted by the project, including future industrial air emissions
Cumulative impacts	- Fails to consider cumulative impacts as defined in the spirit of the EPA definition for the NEPA process - Fails to describe cumulative impacts to each subject area in the REA or the additive effect from combining these individual cumulative impacts - Fails to consider negative cumulative impacts from Alternative A or positive cumulative impacts from other alternatives - States that a Design Overlay Plan will mitigate negative impacts of the extension. However, the Plan is proposed – not adopted – and has not been made available to the public prior to the comment period for the REA
Multi-Modal Access	- Fails to consider negative impacts of Alternative A on multi-modal accessibility from increased vehicle traffic - Does not achieve a stated aim of the project to improve pedestrian and bicycle connectivity by not including sidewalks for the entire length of the extension
Transparency of Data	- Does not provide important data, including: o Impacts to congestion from increased traffic on 2nd Street after the preferred alternative is implemented o Parallel data to compare traffic on Alternative A and other alternatives in 2018 o Data to compare 2035 traffic projections for the same roadway segments under Alternative A and No Build o Air quality monitoring – with the exception of carbon monoxide – or modeling o Data to compare cumulative impacts between Alternative A and other alternatives o Data to compare impacts in multi-modal access for the alternatives o Impacts of the extension to the health and well-being of neighbors living adjacent to the extension, including those it mentions are in six single-family homes located 550 feet north of Alternative A
Alternative Routes Considered	- Insufficiently demonstrates that Alternative A should be the preferred option (*see issues in this table*) - Fails to provide transparent justification for eliminating the TSM/TDM Alternative

Based on findings from our Heath Impact Assessment (HIA) conducted on the first Environmental Assessment released in September 2011, as well as an analysis of the revised Environmental Assessment, Human Impact Partners concludes that the county's proposed project and revised Environmental Assessment of the project is lacking in key areas. Not only does the San Jose neighborhood ***not appear*** to suffer from the traffic congestion used to justify the extension, but the extension could harm public health, through increased air emissions and unsafe streets. Additionally, despite requirements from the Council on Environmental Quality that cumulative impacts be considered in an environmental assessment, the revised Environmental Assessment fails to undertake meaningful cumulative impacts analyses in each of the subject areas it covers, nor does it discuss the additive effect of these individual impacts.

Congestion and Stated Need for the Extension

The REA identifies congestion relief as one major reason for the extension (page 1, paragraph 5). However, the evidence presented does not support this stated need and is insufficient in at least three ways.

First, the REA states that over the past few years, traffic volumes have decreased due to the economic recession and a significant drop in air travel through the Sunport airport (page 18, paragraph 1). With the exception of the Rio Bravo Boulevard road segment, data provided in the REA generally demonstrates a historical trend of traffic volumes that have either stayed the same or have decreased over time from 2008 to 2011 (page 18, table 2-2).[1] Recent construction on Rio Bravo Boulevard in 2011 and 2012 (page 25, paragraph 2) has likely improved volume-to-capacity ratios for this roadway segment, though the REA does not provide current traffic volume data for Rio Bravo Boulevard after the construction.

Second, data in the REA for future traffic volumes suggests greater reduction in vehicles – an estimated 397 vehicles total during peak hours and for roadways having a Level of Service (LOS) of D, E, or F for 2035 – if the extension is not built compared to if the preferred version (Alternative A) is built, based on data provided.[2] Further data cited by the REA suggests the 2nd Street road segment south of Woodward Road will have less traffic in 2035 under the No Build Alternative compared to if the preferred version of the extension were built (tables 2-1 and 3-2).[3] Increased volumes on this particular segment of 2nd Street could contribute to new congestion by increasing traffic backups in two ways: while more vehicles wait at Woodward Road and William Street for railcar changes at the nearby BNSF intermodal rail, or while more vehicles wait to begin to navigate the Rio Grande bridge crossing near 2nd Street and Rio Bravo Boulevard. The REA fails to discuss either of these potential impacts. It simply states, "The No Build Alternative would not meet the purpose and need for connectivity, improving the transportation system continuity or easing area traffic congestion" (page 25, paragraph 3).

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[1] Comparing 2008 with 2011 data, average weekday traffic volumes have increased only for the Rio Bravo Boulevard roadway segment, between Broadway Boulevard and I-25, from 30,820 vehicles per day in 2008 to 32,345 vehicles per day in 2011.

[2] The preferred alternative will reduce congestion (as measured by 2035 projected traffic volumes and poor Level of Service) for Broadway Boulevard, north of Woodward Road and for Rio Bravo Boulevard, Broadway Boulevard to I-25, while the No Build Alternative will reduce congestion for Broadway Boulevard, south of Woodward Road; Woodward Road, east of 2nd Street; and 2nd Street, from Rio Bravo Boulevard to Woodward Road.

[3] As noted in this summary, the REA is not systematic in how it refers to the same road segments under different alternatives. In the absence of data in different years for the same road segments, this statement must assume that where Table 2-1 refers to "2nd Street, Rio Bravo to Woodward" and Table 3-2 refers to "2nd Street, south of Woodward" it refers to the same segment of road.

Third, traffic data is sometimes absent and when provided is inconsistent. A comparison of the preferred alternative (Alternative A) with the No Build Alternative is modeled for 2035, but the REA uses different roadway segments for both 2nd Street and Woodward Road, making it impossible to compare projected traffic volumes under the two alternatives for each of these roadways without assuming they refer to the same segment of road, which they may not. For 2nd Street, table 2-1 refers to the segment from Rio Bravo Boulevard to Woodward Road but table 3-2 refers to the segment south of Woodward Road. For Woodward Road, table 2-1 refers to the segments from 2nd Street to Broadway Boulevard but table 3-2 refers to the segment east of 2nd Street. Further, the REA only provides projected 2018 traffic volumes for Alternative A and does not provide projected 2018 traffic volumes for the No Build Alternative or for other alternatives.

The REA also fails to provide substantive data on whether and how improved access to area economic centers, which could encourage more development, may add to traffic congestion.

Air Quality

The REA acknowledges air emissions sources in the area today – including industry, an airport, and Air Force base – but does not provide data on the amount or type of emissions permitted for each source. It also fails to provide monitoring or modeling data on pollutants associated with vehicle traffic, such as particulate matter, ozone, and nitrogen dioxide. Absent monitoring or modeling data for these pollutants, it is difficult to evaluate the air quality impacts from the combination of existing sources, future traffic, and emissions related to development.

Indeed, the REA fails to predict future emissions for the neighborhood adjacent to the extension or the wider area impacted by the project. Instead, it generally states that the extension meets the federal National Ambient Air Quality Standards for carbon monoxide (page 46), and "the proposed Sunport Extension project is included in the MRCOG FY 2014 to FY 2019 TIP. The TIP conforms to the current State Implementation Plan for Air Quality developed by the Albuquerque – Bernalillo County Air Quality Control Board as required by the CAA." (page 46, paragraph 2). It further states that modeling of air emissions associated with future industrial air emissions was considered outside the scope of the REA (page 88), discounting the necessity of considering cumulative impacts for air quality.

Based on data provided by Human Impact Partners, the resident panel involved in the HIA came to the conclusion that the proposed project was likely to harm the health of San Jose residents – particularly children, older people and other sensitive populations – in a place that already permitted high levels of air pollution and has other contaminants. The table below highlights that ***while San Jose residents make up less than one percent of the City of Albuquerque's population, the community bears a much greater share of permitted pollution for seven important types of pollutants.*** The REA also does not address how the proposed project may contribute to this existing disparity.

Total tons of emissions allowed in San Jose and percent for City of Albuquerque, by pollutant, 2012						
Hazardous Air Pollutants (HAPS)	Sulfur Oxides (SOx)	Particulate Matter 2.5 (PM2.5)	Carbon Monoxide (CO)	Nitrogen Oxides (NOx)	Particulate Matter 10 (PM10)	Volatile organic compounds (VOCs)
76.8 **(11%)**	76.8 **(11%)**	57.0 **(11%)**	734.4 **(10%)**	571.3 **(7%)**	65.0 **(7%)**	295.3 **(6%)**
Source: City of Albuquerque Environmental Health Department, July 2012.						

It is imperative, said one resident, to "protect the health, safety, (and) lifestyle of the people that live in the community," and the extension is an opportunity to illustrate how future development can protect and improve spaces where residents gather.

Cumulative Impacts

The county's REA consistently fails to consider the *cumulative* impacts of adding more traffic and pollution to existing conditions. It fails to describe impacts to each of the subject areas that it covers – such as air quality, noise, socioeconomics and environmental justice that include public health and safety – as well as the additive effect from combining these individual cumulative impacts. Cumulative is defined here in the spirit of the Environmental Protection Agency definition for the NEPA process, as *incremental environmental impacts of an individual project combined with the environmental impacts caused by past projects, the environmental impacts caused by other current projects and the environmental impacts caused by reasonably foreseeable future projects.*

In assessing cumulative impacts, the REA states that the extension will result in positive cumulative impacts from increased economic development, without providing data to support the statement (page 79, paragraphs 2 and 5). It fails to consider possible negative cumulative impacts, stating, "The County has prepared the San Jose/Mountain View Design Overlay plan, which when adopted could mitigate impacts from future new development" (page 79, paragraph 2). Details of the Design Overlay Plan and how it may mitigate impacts are absent.

Without changes to the underlying zoning designation, it is unlikely the Design Overlay Plan will mitigate environmental pollutants from future businesses locating along Woodward Road. Design overlay only addresses the visual aesthetics of design, rather than operational elements of businesses. In fact, the REA states, "Although adherence to adopted design overlay requirements would not be a voluntary process, the presence of the design overlay does not erode property rights of landowners within existing zoning controls" (page 55, paragraph 4).

The REA states that the County's proposed – but not adopted – Design Overlay Plan will also mitigate negative impacts of Alternative A. The Design Overlay Plan was not completed and made available to the public for review or input prior to the comment period for the REA. The not yet adopted document remains an idea but not a definite plan until it is approved. Further, the REA states that Alternative A is in close proximity – approximately 550 feet – to six single-family homes located east of Broadway Boulevard on the north side of Wesmeco Drive (page 62, paragraph 3).

Multi-Modal Access

Through the HIA process, residents found that the proposed extension would make streets less safe for pedestrians and bicyclists through increased traffic. The REA fails to consider negative impacts of Alternative A to multi-modal accessibility from increased vehicular traffic. Additionally, by not providing sidewalks for the entire length of the extension – only 700 feet of it – the REA misses an opportunity to realize a stated aim of the project to improve pedestrian and bicycle facilities and connectivity (page 9, paragraph 3). The REA cites lack of demand for accessing businesses on the east side of Interstate 25 as the reason without providing information to support the statement (page 27, paragraph 2).

Alternative Routes Considered

The REA does not sufficiently demonstrate that Alternative A should be the preferred route for the extension. According to projections provided in the REA, when compared to the No Build Alternative, total vehicles per hour during peak hours would increase under Alternative A

along roadways having a Level of Service of D, E, or F. The REA also does not provide transparent justification for eliminating an alternative for Transportation System Management/Transportation Demand Management (TSM/TDM). Of the TDM, the REA states that no large employers are actively sponsoring TDM initiatives in the study area and of the TSM, it says the alternative would provide "modest and localized improvements" in the operations of the overall existing transportation system, without providing data to substantiate the statement or to compare the TSM alternative with other alternatives (page 23, paragraphs 4 and 5). The REA also fails to consider the negative cumulative impacts that might result from Alternative A and the positive cumulative impacts that might result from the selection of alternatives D or H, both located further from residential areas, a TSM/TDM Alternative, or No Build Alternative.

Transparency of Data

The REA does not provide the data needed to substantiate a number of statements made in the report. The REA does not include data to assess: 1) impacts to congestion from increased traffic along 2nd Street as a consequence of implementing the preferred alternative; 2) parallel traffic comparisons between Alternative A and other alternatives for 2018; 3) 2035 traffic projections under Alternative A compared to the No Build Alternative for the same roadway segments; 4) air quality monitoring – with the exception of carbon monoxide – or modeling; 5) a comparison of cumulative impacts between Alternative A and other alternatives; 6) a comparison of projected improvements, or detractions, in multi-modal access for Alternative A and other alternatives; and 7) impacts of the extension to the health and well-being of neighbors living adjacent to it - residents living in six single family homes 550 feet north of Alternative A.

RECOMMENDATIONS*

The recommendations below come from a variety of sources. Fourteen were developed by the HIA resident panel in response to their analysis of the impacts of the first environmental assessment released in September 2011. They are included here because they continue to be relevant to the significant issues that remain in the REA (as described in this document).

In making these recommendations, we take a broad perspective that includes both the half-mile extension itself and the future economic development that will follow. As such, many recommendations would be implemented after the proposed extension is built, and with an emphasis on preventing future environmental hazards.

Overall

1. The county should more thoroughly and transparently reconsider Alternatives D and H, not only Alternative A, and mitigations.

2. The city and county should improve public information-sharing about the proposed extension and related planning. Specific actions include:
   a. Publicly share plans to meaningfully involve the San Jose neighborhood in ongoing planning for the Sunport Boulevard Extension, to ensure that resident perspectives help shape future development.
   b. Increase communication between city and county, as well as directly to residents, including but not only through the San Jose Neighborhood Association, and ensure communication is in culturally appropriate methods and languages. Publicly and immediately share formal and informal plans for the extension and development in the surrounding area. Specifically, share information on whether there is a vision – and what it is – for promotion of commercial and industrial development along the

extension, such as zoning documents or plans ranging from the short-term to long-term (e.g., five-year plans, thirty-year plans, and so forth).

If the Sunport Boulevard Extension is built:

Environmental Hazards

3. The city and county should require that future permitting processes for the San Jose neighborhood include the completion of cumulative impact assessments that more accurately consider health impacts. Cumulative is defined in the spirit of the Environmental Protection Agency definition for the NEPA process, as *incremental environmental impacts of an individual project combined with the environmental impacts caused by past projects, the environmental impacts caused by other current projects and the environmental impacts caused by reasonably foreseeable future projects.*

4. The City of Albuquerque Air Quality Division should improve air quality monitoring and enforcement of existing air quality regulations in the San Jose neighborhood as follows:
   a. Collect baseline information throughout the neighborhood on actual air quality emissions. If the information is collected by City or County agencies, it should be validated by outside organizations.
   b. After the extension is completed, regularly monitor air quality at sensitive sites such as schools and community centers. Commit to retrofitting these facilities (e.g., provide upgrades to building thermal performance and ventilation systems) to keep indoor air pollutant levels below applicable state and federal standards, and mitigate exceedances found at baseline levels, if pollution levels surpass what is harmful to human health.
   c. Add an air monitor in San Jose where vulnerable populations congregate. The monitor should measure the six criteria pollutants (ozone, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide, and lead), as well as volatile organic compounds.

5. The city and county should ensure compliance with and enforcement of existing noise standards. To do so, the city and county should collect baseline noise measurements in the community of San Jose to ensure standards are not being exceeded.

6. The city and county should consider revising noise control ordinances to set the standard for traffic-related noise, at 65 dBA or less for daytime and 55 dBA or less for nighttime.

Safety from Injuries and Collisions

7. The city should prohibit heavy trucks on residential streets in San Jose neighborhood.

8. The city and county should implement appropriate traffic calming features to slow trucks on roads that will see increased traffic from the Sunport Boulevard Extension.
   a. Examples of traffic calming to consider are reduced speed limits, rumble strips, and landscaping.
   b. Example locations for reduced speed limits are Broadway Boulevard traveling down the hill by Bethel Avenue and San Jose Avenue.

9. The city and county should create facilities to protect and encourage pedestrians and bicyclists on roads near the Sunport Boulevard Extension that will experience increased traffic during and after its construction. Actions include:
   a. Building sidewalks with storm drainage. Example locations are Broadway Boulevard headed to Woodward Road, on Wesmeco Drive, on Arno Street, and John Street.
   b. Extending the bike lane on Broadway further into the San Jose neighborhood.

c. Adding traffic lights at the intersections of William Street and Woodward Road, as well as Second Street and Woodward Road.[c]

10. The City of Albuquerque Transit Department should ensure that the 16/18 bus route is maintained during and after construction of the Sunport Boulevard Extension. Also, the city should build bus shelters where the bus is used but there are not currently shelters to protect riders – for example, on William Street, Woodward Road, and Broadway Boulevard.

Miscellaneous Recommendations

11. Bernalillo County Public Works should include drainage facilities when building the Sunport Boulevard Extension.

12. To advance the economic prosperity of residents in the San Jose neighborhood, the Bernalillo County Economic Development Department should require businesses locating along Sunport Boulevard Extension to develop plans and commitments for local hiring, job training, and educational programs. For example, the city and county could work with businesses to start a GED program with instructors in the community that is free for low-income residents of the San Jose neighborhood.

13. To ensure San Jose residents are actually able to access workforce development and job training programs as well as access new jobs created in the community, the Bernalillo County Economic Development Department should require that businesses locating along Sunport Boulevard Extension *not ask* about applicants' history of arrest in job applications and interviews.[d]

14. The Bernalillo County Economic Development Department should establish a living wage (e.g., modeled on the living wage ordinance in Santa Fe) and require jobs created by businesses relocating or locating along the Sunport Boulevard Extension to pay such wages. In addition to paying a living wage, all permanent jobs (including part-time and full-time permanent jobs) created by business located near the extension should provide full health benefits.

Additional Recommendations

At the conclusion of the HIA process, the Steering Committee and project partners proposed additional recommendations to supplement those from the resident panel. These recommendations were not vetted in the same way, but are listed here as they provide valuable suggestions for appropriate parties to consider as well.

They include:

- Consider completing an Environmental Impact Statement to more fully assess the environmental impacts of the extension on environmental and human health, including reasonable alternatives (including a No Action alternative) that would avoid or minimize adverse impacts or enhance the quality of the human environment.

- The county, MRCOG, or other appropriate party should do a comprehensive traffic study that includes roadways connected to or near the extension that will be affected by it. The study should assess changes in traffic and how those are expected to affect air

[c] Two members of resident panel abstained from this vote

[d] There was not unanimous agreement on this proposal; however, the majority of residents on the resident panel voted in favor of it.

quality and noise. The study should consider potential short-term and long-term development (e.g., five-year plans, thirty-year plans, and so forth) that will and/or could take place if the extension is built.

- Absent discussion of cumulative impacts in this document, planning agencies and other authorities could consider a moratorium on approving projects that will result in new environmental hazards in the community.

- The city and county should draft relevant plans and commit funding to ensure pedestrian- and bicycle-safety measures and improvements on roadways such as Second Street that connect to the extension and will experience increased traffic or congestion, regardless of the alternative chosen. Plans should redesign these roadways for neighborhood pedestrian, bicycle, and vehicular safety, and to avoid increased cumulative air emissions. This should be done prior to completion of the extension in this environmental justice community.

- A specific way to implement the Steering Committee recommendation about public input is for the county to form and fund a Community Advisory Council that regularly provides input and feedback on plans for the proposed extension.

- Improvements to pedestrian and bicycle facilities on adjacent roadways that the extension will affect, such as Woodward Road, should be put in place when the extension is built.

- The County should consider building sidewalk adjacent to the entire length of the extension, rather than for only 700 feet.

- The appropriate body should provide voluntary relocation of residents living in housing that is the closest to the extension.

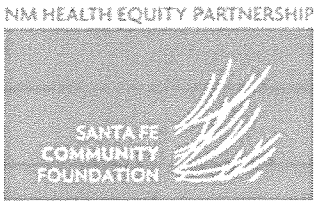
- The appropriate body should involve impacted residents in identifying requirements for developments within the boundaries of the Design Overlay Plan.

Shining a Light on Health: How the Sunport Boulevard Extension Project Will Affect Health and Well-Being

September 2015

By Human Impact Partners, with the participation of residents of the San Jose neighborhood

With support from
Bernalillo County PLACE MATTERS
New Mexico Health Equity Partnership–Santa Fe Community Foundation
New Mexico Department of Health
SouthWest Organizing Project



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I. Introduction

The Bernalillo County Public Works Division is proposing to extend Sunport Boulevard approximately one-half mile from its current end at Interstate 25 to the intersection of Broadway Boulevard and Woodward Road. There it would join Woodward, which eventually ends at Second Street. The Sunport Boulevard Extension (the extension) would be a four-lane divided highway.

The county indicates that the extension will reduce congestion on Rio Bravo Boulevard, Gibson Boulevard and their interchanges with I-25; improve traffic flow by providing another east-west arterial; and continue the development of the street system envisioned in planning documents, which date to the 1980s.

If built, the extension will connect to roads that go through the neighborhood of San Jose in Albuquerque. Over the past two years, neighborhood residents have expressed concerns about the planning processes for the extension, especially the public participation process, and the scope of impacts examined in the county's environmental assessment. San Jose's population is racially and ethnically diverse, younger, lower income, and with higher unemployment than Bernalillo County overall. It has a long history of environmental degradation from industrial and auto pollution, including the designation of two Superfund sites, and meets the criteria of the U.S. Environmental Protection Agency of an environmental justice neighborhood.[1]

San Jose residents approached Human Impact Partners (HIP) about leading a Health Impact Assessment (HIA) of the proposed extension. Residents wanted to understand how the project would impact their health and well-being and to identify recommendations they could submit to the county to mitigate negative health effects or enhance positive effects.

This report summarizes the HIA. It focuses on three key areas: exposure to environmental hazards, safety from injuries and collisions, and social connectedness. Section II gives background information on San Jose, with a focus on the history of environmental issues and current demographics. Section III provides greater detail on the extension, including proposed alternatives, related planning processes, and findings from the county's environmental assessment report. Section IV describes existing conditions and predicts effects if the extension is built as proposed. Section V includes recommendations to decision makers and Section VI concludes the report.

About This HIA

Human Impact Partners led this Health Impact Assessment to understand how the proposed extension will impact the health and well-being of residents of the San Jose neighborhood. According to the National Academies of Sciences, HIA is "a combination of procedures, methods and tools that systematically judges the potential, and sometimes unintended, effects of a policy, plan, or project on the health of a population and the distribution of those effects within the population. HIA identifies appropriate actions to manage those effects." The fundamental purpose of this HIA is to inform decision-makers before they decide on the extension proposal.

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[1] "To be classified as an environmental justice community, residents must be a minority and/or low income group; excluded from the environmental policy setting and/or decision-making process; subject to a disproportionate impact from one or more environmental hazards; and experience a disparate implementation of environmental regulations, requirements, practices and activities in their communities." Source: Environmental Protection Agency, Region 6. Frequently Asked Questions. http://www.epa.gov/region6/6dra/oejta/ej/ejfaq.htm

The HIA work was supported with funding from the W.K. Kellogg Foundation. Data was collected from June to November 2013, in anticipation of an environmental assessment public comment period soon after. However, the environmental assessment was revised and released approximately two years later, in July 2015. The HIA report was mainly drafted based on the original environmental assessment; however, it was completed in September 2015 to speak to significant issues identified in the original environmental assessment and still unaddressed or insufficiently addressed in the revised document.

Guiding the HIA process was a steering committee that included Human Impact Partners, a resident of the San Jose neighborhood, Bernalillo County PLACE MATTERS, New Mexico Department of Health, New Mexico Health Equity Partnership–Santa Fe Community Foundation, and the SouthWest Organizing Project. Early in the HIA planning process, the steering committee decided to use a consensus model. This approach seeks to meaningfully engage residents through a participatory research process, particularly when limited resources are available to weigh in on a proposal and a relatively short decision-making timeline is expected. The model is adapted from an approach that originated in Denmark to guide elected officials in science and technology decisions and stimulate public discussion of these issues.

For this HIA, the model included two meetings attended by a panel of residents likely to be affected by the decision (resident), members of the steering committee, and other stakeholders, as well as technical experts on the subjects under assessment (subject experts) who joined one of the meetings. The 10 panel members were all residents of the San Jose neighborhood and were identified and recruited by personal outreach from steering committee members. The HIA timing was initially targeted around an expected release of the EA in late Fall or early Winter 2013. The first meeting of the resident panel was on August 17, 2013. Panel members explored the connectedness between transportation and health, learned about the consensus process and how it could be used for the extension, and came to consensus on priority issues. From input at that meeting, the steering committee finalized the scope of the HIA.

At the second meeting, on September 14, 2013, panel members first examined demographic information about the neighborhood in the three issue areas. Then residents talked with experts in air quality and economic development, who provided a context for how these issues were relevant to the proposed extension. Residents also heard about resources for information on safety from injuries and collisions. Then they worked to reach consensus on likely effects the extension would have on factors that shape health, and came to consensus on recommendations to be included in the HIA.

HIP conducted the research and drafted the report, prepared materials for and helped facilitate the meetings and managed the overall process. Local steering committee members organized the meetings and facilitated portions of the agenda; provided feedback on the HIA's pathways and scope of research, and tracked the extension process. Resident panel members received a stipend of $100 for their participation at each meeting. At both meetings we provided breakfast and lunch, simultaneous Spanish interpretation, and all materials in English and Spanish. The second meeting also provided child care for participants.

Extensive research recognizes that health is a product of social, environmental and economic conditions that create opportunities for individuals, families and communities to lead healthy lives. We defined health in this broader context, leading the scope of research in the HIA to focus on three key areas: exposure to environmental hazards; safety from injuries and collisions; and social connectedness. See Appendix B for HIA pathway diagrams.

We examined more than 50 indicators and findings were derived through a range of methods. We reviewed the literature on the key areas of interest, conducted limited secondary data analysis and mapping of local data, and gathered statistics from administrative reports and government websites.

About Human Impact Partners

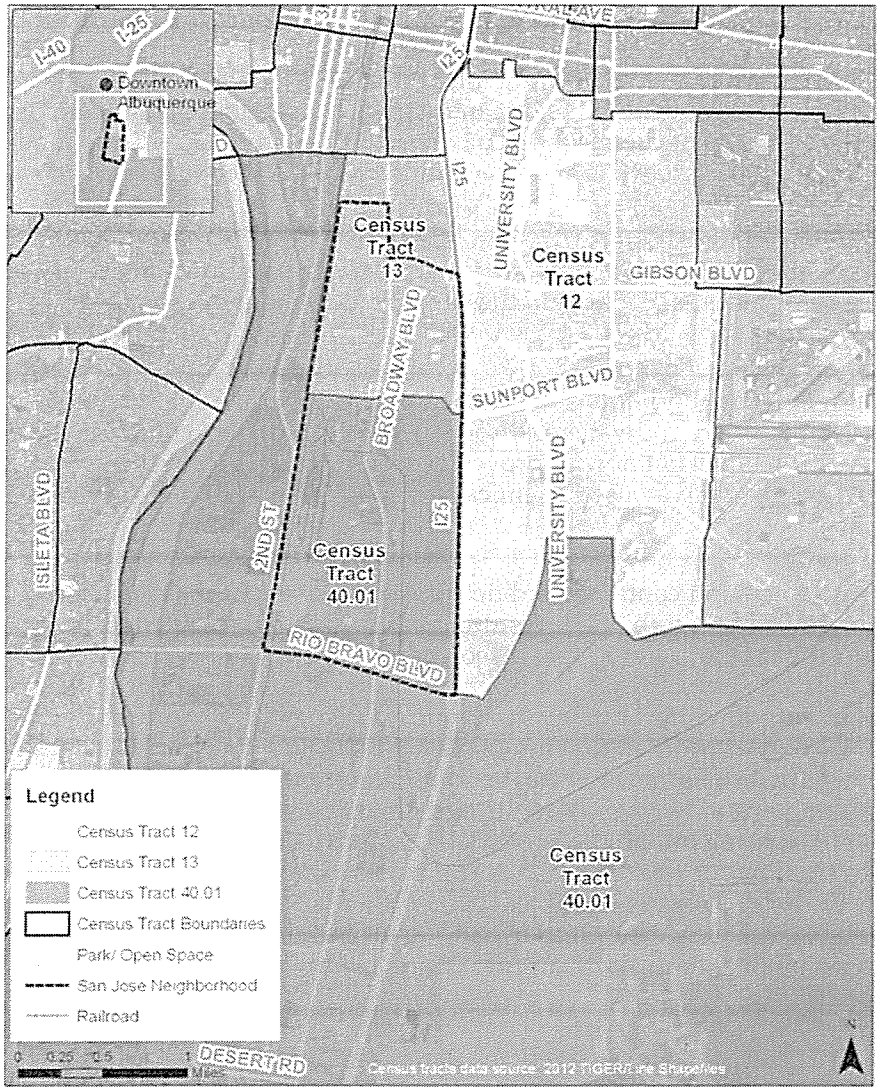
Human Impact Partners is a 501(c)3 organization based in Oakland, Calif. HIP's mission is to transform the policies and places people need to live healthy lives by increasing the consideration of health and equity in decision-making. Through research and advocacy, we help organizations and public agencies use innovative data, processes, and tools that evaluate health impacts and inequities to challenge the inequities that harm the health of our communities. Through training and mentorship we also build the capacity of impacted communities and their advocates, workers, public agencies, and elected officials to conduct health-based analyses and use them to take action.

Our work is guided by the definition of health established by the World Health Organization in 1946: "Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity." We are one of the few organizations in the United States conducting health-based analyses with an explicit focus on uncovering and then addressing the policies and practices that make communities less healthy.

II. Background

The study area for this HIA is the San Jose neighborhood of Albuquerque, as identified by the San Jose Neighborhood Association. This area is bounded on the south by Rio Bravo Boulevard, on the west by the Santa Fe railroad tracks, on the north by Kathryn Avenue, and on the east by Broadway Boulevard, Gibson Boulevard and Interstate 25.

Map 1. San Jose neighborhood



Source: Human Impact Partners, December 2013.

Below we describe a brief history of environmental issues in San Jose and an overview of the neighborhood's demographics.

IIA. History of Environmental Issues in San Jose

San Jose has been next door to industrial and commercial operations for over a century. The neighborhood began as a primarily agricultural area in the early 1800s, became an industrial area with the arrival of the Atchison, Topeka and Santa Fe Railroad in 1880, and entered a period of decline in the mid-20th century. Today, land use policies continue to reflect this legacy by permitting rail lines and industry close to homes.[1]

The Environmental Protection Agency lists two Superfund sites in San Jose, both considered national cleanup priorities. The South Valley site is a one-mile radius around a public well being treated for groundwater contamination. In 1978 testing was done in response to resident complaints and detected chemicals called volatile organic compounds, which can be toxic to humans. The contamination was attributed to historic industrial and commercial operations, in particular the byproducts of decades of chemical and manufacturing activities by Univar and General Electric.[2] In the 1980s, 20 private wells and two municipal wells were taken offline and in 1994 two municipal wells were plugged and permanently abandoned.[2,3,4] There have also been efforts to clean up underground aquifers that were contaminated. In 2009, a five-year review found signs of contaminants and recommended that treatment continue. Residences are in close proximity to the site – at least one is within the site's borders and additional residences are adjacent to the site.[2]

A second Superfund site in the neighborhood is the Atchison, Topeka & Santa Fe (AT&SF) site. It has been undergoing cleanup of groundwater and soil since 1990 to correct contamination to it and is due for review in 2013, but is not now approved for reuse. The AT&SF site is the former home to a plant where the railway used chemicals such as creosote, which is harmful to human health.[2,5]

In 1972 the plant was demolished and contaminated debris from the structure was unsafely dumped into a nearby wastewater reservoir. The resulting contamination threatened groundwater and the soil. A hazardous liquid that dissolves in groundwater and slowly seeps towards the underlying bedrock was released. Additional risks were posed by zinc in the soil and toxic concentrations of air pollutants known as polynuclear aromatic hydrocarbons (PAH). The company, renamed BNSF, was ordered to remove the debris from the reservoir in 1990. Corrective actions have included soil and water treatment, removing or capping contaminated soil and sludge, and replacing groundwater. Under an agreement between BNSF, EPA, and the New Mexico Environment Department, the site is restricted to future industrial and commercial activities as a tradeoff for relaxed on-site capping standards.[6]

There is a strong tradition in the South Valley and in San Jose of community involvement in identifying potential environmental hazards, including efforts led by organizing groups, a local church, and residents alike.

In the 1960s, two local political organizations, the Black Berets and Brown Berets, sought to address a foul-smelling sewage treatment plant affecting residences in San Jose, organizing a neighborhood tour for officials.[7] More recently, active groups have included the SouthWest Organizing Project, a national pioneer of the environmental justice movement that continues in the South Valley today.[8,9]

Separately, a local church played a key role in a lawsuit filed by the New Mexico Attorney General that resulted in a multi-million dollar settlement with Chevron-Texaco.[10,11] Similarly, in 2004, South Valley residents and Amigos Bravos, a statewide conservation organization, pushed for important revisions to the Water Quality Control Commission's surface water

quality standards.[12] As recently as 2008, South Valley residents were involved in an effort urging the Bernalillo County Air Quality Control Board to adopt an environmental justice resolution and consider cumulative impacts of pollution.[13]

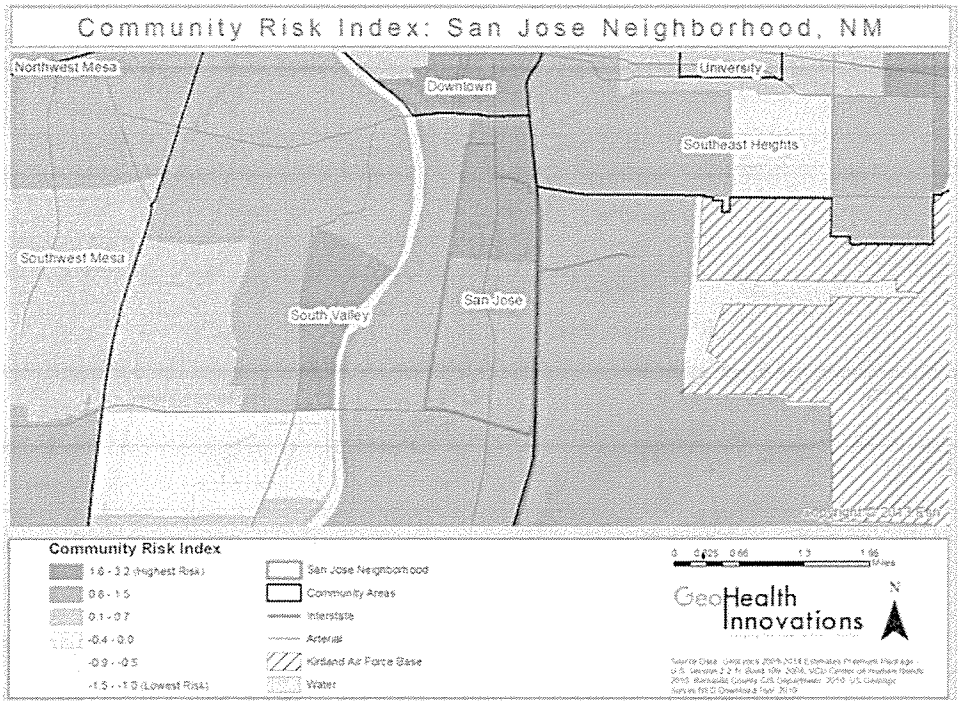
In the 1990s and 2000s, the now-defunct Albuquerque San Jose Community Awareness Council played an instrumental role in advocating for the environmental concerns of the community.[14] Growing from volunteers based in a neighborhood church to a state-funded environmental educational program, the council has been credited with many successes.[15,16] The record of public comment on the AT&SF plan shows that the council provided a strong, professionally informed presence on behalf of San Jose residents in the decision-making arena.[17]

More recently San Jose residents have urged consideration of the potential health effects of proposed projects such as an indoor dirty material recovery facility and a newly acquired Vecenergy bulk gasoline terminal.[18] Residents also have participated in a community-operated air-quality monitoring project in partnership with the SouthWest Organizing Project and Global Community Monitor.[18,19,20]

IIB. San Jose Today

A picture is worth a thousand words. The map of San Jose below depicts the neighborhood's *community risk index*, among the highest in Bernalillo County. Risk is defined here as a single measure that is created by combining several economic, educational, and social factors such as unemployment, education, and crime.[i]

Map 2. Community risk index by census tract, San Jose neighborhood, Albuquerque, 2010



[i] For the full list of factors included in the index, see: http://www.societyhealth.vcu.edu/Page.aspx?nav=214

Table 2 describes demographics in the neighborhood. (Data often are not available for this exact area, and in those cases we use the closest approximations available.[4]) Overall, San Jose makes up less than one percent of the county population. However, compared to Bernalillo County it is a younger neighborhood, with a larger portion of the population under age 18, and one with a much higher proportion of non-whites (it is predominantly Hispanic/Latino).

Nearly 1 in 4 families in San Jose lives in poverty; the median income is 60 percent that of Bernalillo County overall. Less than half of residents have a high school diploma or equivalent, in a county where jobs often require the equivalent of a high school degree or higher (see Table 1). Unemployment is nearly one-third higher in the neighborhood than within the county overall.

Table 1. Example of minimum education level required for jobs in Bernalillo County, October 2, 2013

Minimum Education Level	Percentages for Bernalillo County
Not Specified	N/A
High School Diploma or Equivalent	50 %
Vocational School Certificate	3%
Associate's Degree	11%
Bachelor's Degree	30%
Master's Degree	5%
Doctorate Degree	1%
Source: New Mexico Department of Workforce Solutions, October 2, 2013.	

San Jose residents spend less time, on average, getting to work than county residents overall. More residents take public transportation to work when compared to the county, and a larger portion does not have access to a car.

Table 2. Demographics of San Jose neighborhood and Bernalillo County, NM

Indicator	San Jose neighborhood	Bernalillo County
Population[21]	4,301	655, 306
Age[21]	33%	24%
Non-white population[21]	97%	58%
Hispanic / Latino population[21]	94%	48%
Median household income (in 2011 dollars)[22]	$28,507	$48,231
Income below poverty in the past 12 months[22]	13%	24%
Less than a high school diploma or equivalent[22]	53%	13%

[4] For health data, from the New Mexico Department of Health, and per the recommendation of staff at that agency, the report uses Small Area 7. For demographics and environmental hazards, we use census tract 13. For crime data, we use the San Jose Neighborhood Association boundary and report information only from the Albuquerque Police Department; this excludes the portion of the neighborhood in the Bernalillo County Sheriff Office's jurisdiction.

Table 2 (continued)

Indicator	San Jose neighborhood	Bernalillo County
Unemployment[22,24]	10.9%: 2007-2011 estimate 6.2%: 2006-2010 estimate	7.3%: 2007-2011 estimate 4.2%: 2006-2010 estimate
Time spent traveling to work[22]	19 minutes	22 minutes
Public transportation to commute[22]	6%	2%
Access to a motor vehicle[22]	8%	6%
Sources: American Community Survey, 2006-2010 and 2007-2011.		

High crime rates have decreased over time both in the San Jose neighborhood and Albuquerque overall, but remain an area of focus today. Recent rates for reported violent crimes are lower, but property crime rates are higher in San Jose than in the city overall.

Reported violent crimes in the neighborhood are an estimated 3 per 1,000 people compared to an estimated 8 per 1,000 people in the city overall; however are likely an undercount in the neighborhood.[s] Reported property crimes are an estimated 21 per 1,000 people in the neighborhood compared to an estimated 5 per 1,000 people in the city overall.[25]

In both Albuquerque and Bernalillo County, gross receipts dipped during the national recession in 2008, though the city experienced a larger dip than the county (see table 3).[-]

Table 3. Tax revenues for City of Albuquerque and Bernalillo County, FY2007-2011

Municipally Imposed Gross Receipts Tax Revenues, City of Albuquerque and Bernalillo County, Fiscal Years 2007 to 2011 (in millions of dollars)					
	2007	2008	2009	2010	2011
City of Albuquerque[26]	$188.6	$177.9	$154.2	$132.0	$ 144.5
Bernalillo County[27]	$100.1	$95.8	$91.7	$89.1	$89.7
Sources: City of Albuquerque, 2012 and Bernalillo County, 2008 to 2011.					

Zoning in San Jose allows various residential uses in the northern part of the neighborhood, and various types of industrial and heavy manufacturing uses in the southern part. In terms of how land is actually used, it is primarily a mix of vacant properties or other uses, industry, and homes (39% vacant or other, 29% industrial, 10% residential). There is some commercial land use (4%), but overall there are few commercial or retail opportunities for residents, either for jobs or as consumers (see map 3).[28]

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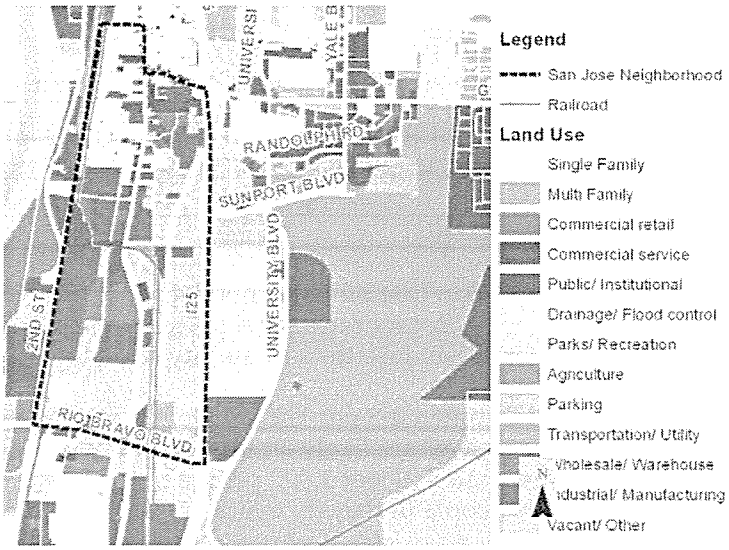
[s] For San Jose neighborhood estimated crime rates are derived from crime frequencies provided by the Albuquerque Police Department (APD) and population estimates from the U.S. Census. These numbers are likely an undercount. They include reported crimes in the APD jurisdiction, which does not include areas of San Jose that are in the jurisdiction of the Bernalillo County Sheriff's Department. Also, they include only reported crimes. Many crimes may go unreported. A limitation is that the estimates approximate the population of the area served by Albuquerque Police Department, using U.S. Census information. Estimates of crime rates for the City of Albuquerque are reported from the FBI's Uniform Crime Reporting system.

[-] Sales tax revenue is a major source of revenue for local, state, and federal governments. In New Mexico, sales tax revenue is measured in gross receipts revenue. Gross receipts revenues are not readily available at the level of the San Jose neighborhood; however, they are available for the city and county overall.

Map 3. Land use in and around San Jose neighborhood



Source: Human Impact Partners, December 2013.

Snapshot of health in San Jose

A recent study in the *American Journal of Public Health* that focused on women, summarized the importance of social conditions in thinking about demographics and health outcomes:

> *". . . Higher rates of both poor health outcomes and higher risk behaviors in women of color and low-SES women should be seen as reflective of adverse social circumstances rather than individual failing. In a similar way, data on lower rates of adverse health outcomes and risk behaviors in White and more affluent women should be seen as reflective of the privileges and advantages that accompany membership in a dominant social group."*
>
> *- Dehlendorf et al. AJPH, October 2013, vol 103, no 10*

From that perspective, we summarize current health conditions in San Jose and related costs.

San Jose's health area has among the highest rates in the county of deaths from several health conditions. It ranks first in deaths from cancer as well as conditions related to hardened arteries and high blood pressure, second in deaths from diabetes as well as respiratory diseases related to flu and pneumonia, and sixth in deaths from heart disease.[11,29]

Living with these conditions has costs for residents, and a large proportion of neighborhood residents do not have health insurance. The average cost of cancer treatment is $150,000.[30] One-year costs for patients with atherosclerosis, or hardened arteries, average approximately $13,000.[31] Costs associated with stroke average $15,000 per person, and the American Diabetes Association estimates around $8,000 in annual cost for a person with diabetes is.[32,33] For a person who experiences heart failure, costs to cover medication and hospital are an estimated $8,500.[34] Approximately one-fourth (24.3%) of residents in the neighborhood do not have health insurance; a higher proportion than for the county overall (19.8%).[35]

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[11] Based on death rates – meaning deaths per 100,000 people – that have been adjusted for age during the period 1999-2011 across small areas in Bernalillo County.

III. About The Sunport Boulevard Extension Project

This section describes in detail the proposed Sunport Boulevard Extension, lists planning documents apart from this project that explicitly reference the proposed extension, and describes findings from the county's initial environmental assessment.

III.A. The Proposed Extension in Detail

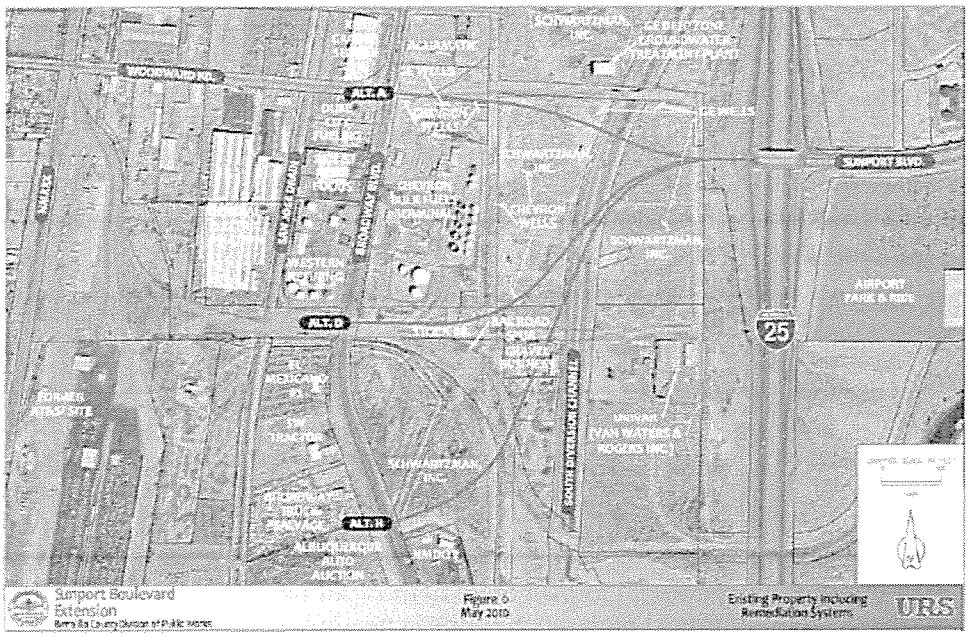
At-A-Glance (based on 2011 Environmental Assessment)

Justification: Lengthen Sunport Boulevard so it connects to Woodward Road and eventually ends at Second Street, instead of its current endpoint at the I-25 interchange
Length: Approximately half a mile
Design: 4 lanes
Cost: $17 million-plus
Funder: Federal and state transportation agencies, county public works
Location: TBD; county prefers Woodward Road option (called "Alternative A")

The county is considering three routes for the extension, all of which seek to extend Sunport Boulevard from its current end at I-25. Of the three options under consideration, the county prefers the Woodward Road option.

- Woodward Road option (Alternative A): Lengthen Sunport Boulevard to the intersection of Broadway Boulevard and Woodward Road. There it would join Woodward, which ends at Second Street.
- Stock Drive option (Alternative D): Lengthen Sunport Boulevard to the intersection of Broadway Boulevard and Stock Drive, south of the Chevron bulk fuels terminal.
- Unnamed street option (Alternative H): Lengthen Sunport Boulevard to the intersection of Broadway Boulevard and an unnamed 400-foot-long long dead-end street that is just north of an equipment yard for the New Mexico Department of Transportation.

Map 4. Alternatives under consideration, Sunport Boulevard Extension



Source: URS Corporation, September 2011.

The proposed extension would include:

- A median divider
- Bridges over the Albuquerque Metropolitan Arroyo Flood Control Authority South Diversion Channel and over Edmunds Street
- A combination of retaining walls and fill sloping to grade

The extension also crosses the South Valley Superfund site, described above.

The county is undertaking the proposed extension in cooperation with the New Mexico Department of Transportation and the Federal Highway Administration. The estimated cost is between $17.1 million and $17.9 million. Not included in the cost are proposed, but unfunded, improvements for Woodward Road, which connects to the Sunport Boulevard Extension.

Currently the project is undergoing environmental assessment. Funds have been allocated but the assessment must be completed before the county can complete design and construction by the projected fall 2017 completion date.

III.B. The Proposed Extension in Context

Over time, various planning processes for the city, county and region have shaped the San Jose neighborhood. Below are several key plans that mention the proposed extension. In these documents, the project is considered a "committed improvement," one that has dedicated funding and is expected to be built.[37]

Mid-Region Council of Governments (MRCOG) 2035 Metropolitan Transportation Plan, approved in June 2011. The Metropolitan Transportation Plan is a long-range planning document, updated every four years and projecting 20 years in the future. It identifies transportation needs, goals, and a framework to meet these needs.

MRCOG FY 2012 to FY 2017 Transportation Improvement Program. The Transportation Improvement Program is a plan for implementing needs identified in the Metropolitan Transportation Plan. It is updated twice a year and covers projects intended to begin six years into the future. It also lists anticipated federal, state, and local money for the projects.[38] For the proposed extension, the plan estimates the cost at nearly $18 million.

New Mexico Statewide Transportation Improvement Program. The state has its own version of the Transportation Improvement Program, since federal funds go through the state to regional agencies like MRCOG. The state plan, current as of September 2013, includes the proposed extension, listing state sources of funding to contribute to the nearly $18 million estimated cost.

Additional plans that touch on the San Jose neighborhood include the comprehensive plan, and various area and sector plans. See Appendix A for a summary.

About Environmental Assessments and Environmental Impact Statements[39,40,41,42]

Environmental Assessment is a brief public document that agencies use when the magnitude of impacts from a project are uncertain. It has three purposes: to provide sufficient evidence and analysis for agencies to determine whether to prepare a more in-depth report, known as an Environmental Impact Statement; to help an agency identify alternatives and mitigation measures if a more in-depth Environmental Impact Statement is not needed; and to help an agency prepare an Environmental Impact Statement, if one is needed. An Environmental

Assessment is made publicly available, and after public comments are received and considered, a final decision is made to either: 1) prepare a more in-depth Environmental Impact Statement because the Environmental Assessment showed that the project will have significant impacts, or 2) make a Finding of No Significant Impacts, known as a FONSI, meaning the project proceeds without preparing an Environmental Impact Statement. The Sunport extension project is currently in the environmental assessment phase.

Environmental Impact Statement is a detailed analysis that a federal agency must prepare if it is proposing a major federal action that will significantly affect the quality of the prospective, meaning future, human environment. The statement is prepared after an Environmental Assessment finds that the project will have significant impacts, or if an agency decides to skip an EA entirely because it considers a project environmentally controversial and goes directly to preparing the Environmental Impact Statement. The statement should discuss significant environmental impacts and reasonable alternatives (including a No Action alternative), which would avoid or minimize adverse impacts or enhance the quality of the human environment. The regulatory requirements for an Environmental Impact Statement are more detailed than the requirements for an Environmental Assessment.

Sources: Council on Environmental Quality, 2013; US Department of Transportation, 2013; US Environmental Protection Agency, 2013.

III.C. The Proposed Extension: Environmental Assessment Background and Findings

In September 2011, Bernalillo County Public Works released an environmental assessment for the Sunport Boulevard extension project. Prepared by the URS Corp., the document primarily describes the project's history, purpose and need; design alternatives for the extension; and the affected environment, projected effects and proposed mitigations. In July 2015, the county released a revised environmental assessment report for the same project.

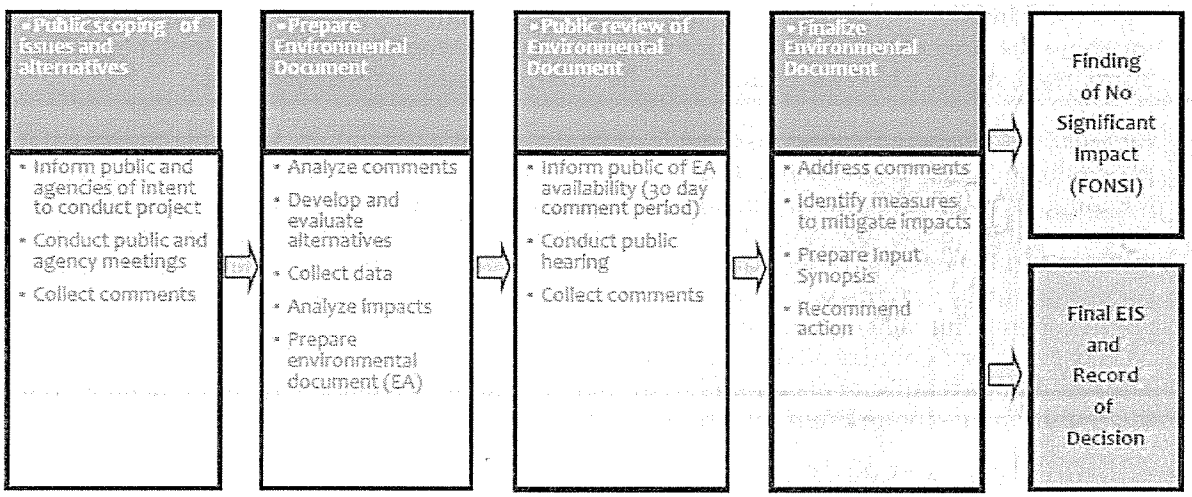
According to the 2011 assessment, the need for and purpose of the Sunport Boulevard Extension are to:

- Reduce traffic congestion on the adjacent arterial streets of Rio Bravo Boulevard, Gibson Boulevard and their interchanges with I-25.
- Connect elements of the area's transportation network by providing another east-west arterial roadway connecting Broadway Boulevard and I-25.
- Continue the development of the planned transportation system and incorporate Sunport Boulevard between Broadway Boulevard, I-25 and Albuquerque International Sunport Airport as envisioned in previous planning documents dating to the 1980s.

Draft environmental assessment findings that are particularly relevant to the HIA are described in Table 4. They include findings for traffic congestion, air quality, noise, bike lane access, bus access, economic development, monitoring of remediation on Superfund land, communities and land use, socioeconomics and environmental justice, and cumulative impacts.

The graphic below, from the county's Public Works Division, describes key points in the environmental assessment process for the extension.[a] In September 2011, the county released the first draft of the assessment. The revised assessment was made publicly available in mid-July 2015, with a subsequent public comment period ending in September 2015. The county intends to submit the report to relevant federal and state agencies for final approval with a request for a Finding of No Significant Impact (FONSI), unless significant impacts are identified during the public comment period. If a FONSI is requested, an Environmental

Impact Statement will not be required, meaning the county will be able to access allocated funds to begin design in 2014-2015 and construction in 2016-2017.



Source: Bernalillo County Public Works, (n.d.).

Table 4. Summary of Key Findings from Sunport Boulevard Extension Environmental Assessment	
Topic	**Future effects under Alternative A**
Traffic congestion	- More traffic by 2030 or 2035. - Extension will help decrease overall congestion and reduce traffic on Broadway Boulevard to the north of Sunport Boulevard and Woodward Road. Traffic volumes on Broadway Boulevard to the south of Sunport Boulevard and Woodward Road will increase.
Air quality	- Extension will not raise carbon monoxide emissions above the federal threshold criteria. - Extension is not expected to seriously affect overall air quality. - A dust control plan will be in place during construction.
Noise	- No anticipated noise impacts, so no plans to reduce noise impacts.
Bike lane access	- The half-mile extension will include five foot bike lanes on each side, to eventually connect Broadway Boulevard with University Boulevard - The bike lanes will be part of a future connectedness to the Riverside Trail.
Bus access	- Will look into making it easier to transition from one transportation type to another. - Will consider different forms of transportation, including how to get people to the airport.
Economic development	- New access to land for potential businesses will spur industrial redevelopment and the cumulative impact will be positive for economic and commercial growth.
Monitoring of remediation on Superfund land	- Road option will only impact a portion of the Superfund site and Chevron facility. - If needed, Woodward Road option (Alternative A) will relocate water lines and monitoring wells associated with remediation for the site.
Communities and land use	- Land use will not be significantly affected as it is primarily vacant land. - Preferred option is consistent with area planning and will conform to predicted growth of the area. - Extension will provide additional access to the area of the planned industrial corridor. - Preferred option will incorporate bicycle lanes and make provisions for future sidewalks
Socio-economics and environmental justice	- Residents will experience changes to traffic volumes (*see Traffic Congestion above*). Forecasted decreases in traffic volumes north of Woodward Road will result in an overall positive impact to these neighborhoods. - The preferred option is located within areas of Interstate highway right-of-way, vacant land, manufacturing, or special use zoned property, and is unlikely to disproportionately impact the neighborhood. - The project is not expected to impact community cohesion, displace people, or in other ways disproportionately and adversely impact minority or low-income populations.
Cumulative impacts	- Cumulative impact will be positive for economic growth *(see Economic Development)*. - A cumulative impact to alternative transportation will result from the preferred option. - No significant cumulative impacts are anticipated from the preferred option.

IV. Findings

The HIA focused on how the proposed extension would affect three key areas:

- Exposure to environmental hazards
- Safety from injuries and collisions
- Social connectedness

In this section we describe findings related to each of these areas – how they relate to health, what the environmental assessment says, and resident panel analysis and discussion of potential effects of the proposed extension. Table 5 briefly summarizes our findings about existing conditions.

Table 5. Summary of Existing Conditions

Exposure to Environmental Hazards

Stationary Sources:

- San Jose has numerous facilities producing hazardous environmental emissions and a high density of those facilities compared to other census tracts in the county.
- As of July 2012, the City of Albuquerque had permitted 17 sites in San Jose as stationary sources of air pollution. Data on permitted emissions illustrate that San Jose makes up less than one percent of Albuquerque's total population, yet the neighborhood bears a disproportionate share of permitted emissions for seven of eight pollutants reported.
- In 2012, the South Valley air monitor registered levels of ozone and PM10 that exceeded both primary and secondary health standards.

Mobile Sources:

- Average weekday traffic in the project area is heaviest on the east-west corridor of Rio Bravo Boulevard – about 32,000 vehicles a day– at the southern section of the neighborhood, and south of the proposed project.
- Cars are the majority of vehicles on these roadways but there are a large number of heavy trucks on Broadway Boulevard.
- The project area does not appear to suffer from traffic congestion, with exceptions such as Rio Bravo Boulevard west of I-25.

Noise:

- Despite the presence of many sources of noise, data are not available on baseline noise levels.

Safety from Injuries and Collisions

Collisions:

- Collisions between automobiles and either pedestrians or bicyclists are relatively infrequent in San Jose. Those that do occur tend to cluster in the north edge of the neighborhood.

Facilities for pedestrians and bicyclists:

- Facilities for walking and bicycling in the neighborhood are scarce. The entire project area currently has only three blocks with designated bike lanes.

Social Connectedness

- Gathering places in and near the neighborhood include churches, community centers, homes of friends and family, schools, parks and playgrounds. Residents did not mention gathering at restaurants or other retail areas.

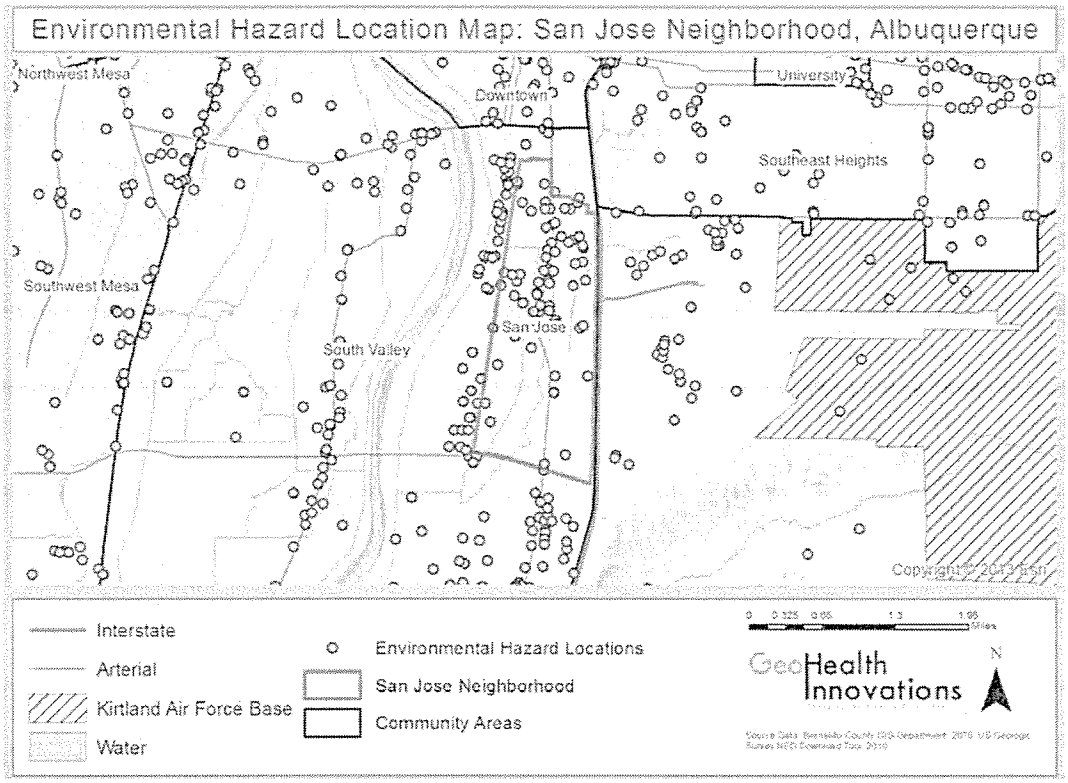
- Residents perceive the neighborhood as less close-knit today than in the past and as a place with a negative reputation owing in part to crime, which has decreased over time but remains relatively high.
- Residents want future development to protect and improve these gathering spaces, including parks and a health facilities and markets, schools and workplaces. They want to preserve and expand the ability to breathe and walk in the environment, safety from traffic and the scenery.

IVA. Exposure to Environmental Hazards

There is a wide range of potential environmental hazards in the neighborhood. Conventional practices in environmental hazards management address risks individually, segregating hazards from different chemical pollutants and from different exposure pathways. But human health depends on the cumulative effect of all exposures. As stated by Alves et al (2012):

> In reality, people are exposed to mixtures of pollutants or to the same pollutant through a variety of media, including the air, water, and food. It is now more recognized than before that environmental exposure to pollutants occurs via multiple exposure routes and pathways, including inhalation, ingestion, and dermal absorption.....Consequently, to arrive at a realistic assessment of exposure risks, regulatory authorities arguably should consider cumulative stressors and exposure data derived from cumulative risk assessment.[4]

Map 5. Environmental hazard locations in San Jose, 2010



Map 5 shows numerous facilities producing hazardous environmental emissions throughout the neighborhood. Facilities include hazardous chemicals dumpsites, locations contaminated by hazardous materials, railroad depots, discharge permit locations, petroleum storage sites, industrial and manufacturing sites, stationary air pollution sources, Superfund sites, and interstates and arterial roads. The density of these facilities relative to the rest of the city and county is high: ***San Jose has a greater density of hazards per square mile compared to many other areas of the county.***

San Jose stands to benefit from a more holistic assessment of environmental and social risks. Given the area's many hazardous facilities, it is insufficient to only examine the incremental

contribution of a single project to the neighborhood's burden of environmental exposure and risk. Local agencies charged with analyzing proposed projects should consider how exposures from multiple sources may act together over time to expose residents to increased health risks.

With cumulative impacts in mind the next section describes conditions for various hazardous exposures in San Jose.

Existing Conditions: San Jose has a disproportionate burden of facilities producing hazardous environmental emissions

Air Quality: Exposure to Stationary Sources of Air Pollution
There are two key categories of sources for air pollution: stationary sources and mobile sources. Mobile sources include vehicles, such as cars, trucks or airplanes. Stationary sources are fixed sites such as factories or refineries.[45]

As of July 2012, the City of Albuquerque had approved permits for 17 sites in San Jose that are stationary sources of air pollution. As there is no data available on actual emissions for these sites, Table 6 below shows the total tons of pollutants (by type) permitted in the air quality permits issued for San Jose.

The table also shows what share these permitted emissions in San Jose make up of the city's overall total. For example, the neighborhood of San Jose has seven percent of the City of Albuquerque's total permitted emissions for PM10 and 11 percent for PM2.5, two types of airborne fine particles that can penetrate deep into lungs.

These data illustrate that San Jose makes up less than one percent of the City of Albuquerque's population, but bears a much greater share of permitted pollution. The neighborhood bears a disproportionate share of the permitted emissions in the city for seven of eight pollutants reported.

Map 6. Stationary sources of air pollution in San Jose neighborhood, 2010

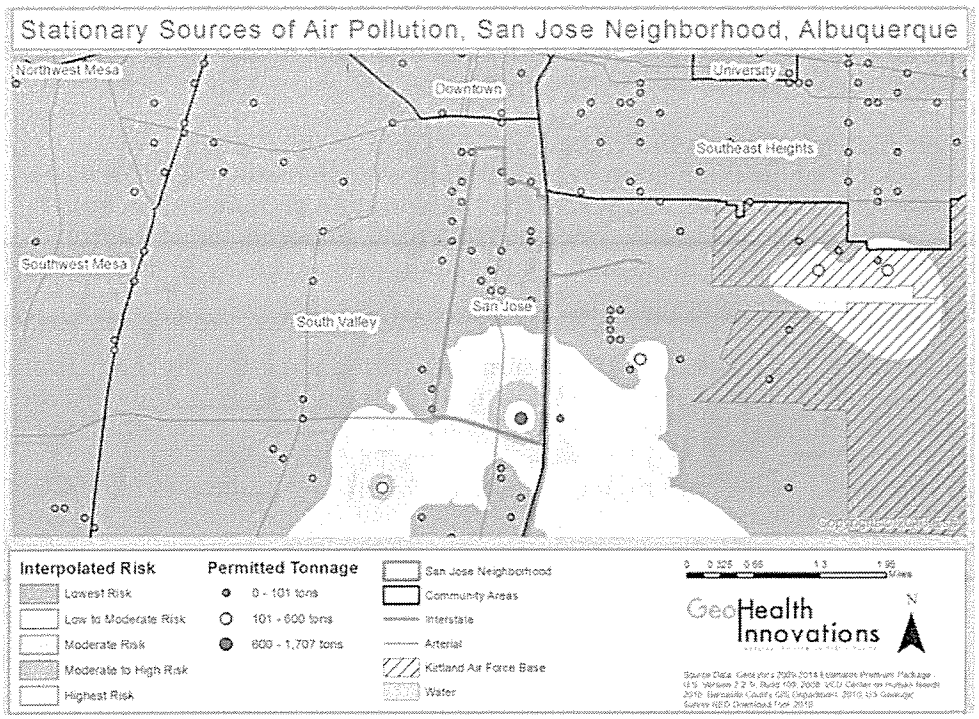


Table 6. Total tons of emissions allowed in San Jose and percent for City of Albuquerque, by pollutant, 2012

Particulate Matter 10 (PM10)	Particulate Matter 2.5 (PM2.5)	Carbon Monoxide (CO)	Nitrogen Oxides (NOx)	Hazardous Air Pollutants (HAPS)	Sulfur Oxides (SOx)	Volatile organic compounds (VOCs)	Lead (Pb)
65.0 **(7%)**	57.0 **(11%)**	734.4 **(10%)**	571.3 **(7%)**	70.0 **(28%)**	76.8 **(11%)**	295.3 **(6%)**	0.0 **(0%)**
Source: City of Albuquerque Environmental Health Department, July 2012.							

Data from the Prosperity air monitor in the South Valley – the closest monitor to San Jose, about four miles away – show that the neighborhood has recently been subject to outdoor air concentrations close to or exceeding the maximum levels accepted by national air quality standards. In 2012, the South Valley air monitor on some days exceeded both the primary and secondary standards meant to protect public health and welfare for levels of ozone and PM10, respectively.[46,47] The violations have not been consistent enough for the area to merit the EPA's official designation of non-attainment for air quality. Nevertheless, the information here suggests attention should be paid to the high levels of these pollutants.

For the last decade, the South Valley monitor has registered ozone levels approaching the national standard for all of the last decade.[48] Additionally, according to EPA data, a recent spike in PM10 levels in San Jose cannot be explained by exceptional events such as wildfires or weather.[49,50] This information directly contradicts the environmental assessment's suggestion that the excessive PM10 levels can be attributed to fires and high winds. In the context of cumulative impacts,[51] additional development that even marginally exacerbates the ambient levels of these pollutants could exceed safe margins.

There were no violations in 2012 for ambient levels of carbon monoxide (CO), a main point of focus in an Air Quality Review report for the extension.[49] Bernalillo County had high concentrations of CO in the past, but has been in attainment since 1996. According to the EPA's national database, no area in the country has been under a non-attainment designation from CO levels since 2010, reflecting advances in emissions controls.[51]

Air Quality: Exposure to Mobile Sources of Air Pollution
Nationally, nearly 20 percent of the population lives near high volume roads where daily average traffic is 25,000 vehicles or more, and where the concentration of mobile source air pollutants is typically elevated, posing health concerns.[52] In the US, minority and low-income households are more likely to live near these high volume roads or in an area with higher traffic density than white or higher income populations.[52]

The neighborhood of San Jose is adjacent to I-25 and numerous arterial roads with heavy traffic. Data from MRCOG demonstrate that average weekday traffic in the project area is highest on the east-west corridor of Rio Bravo (approximately 27,000 vehicles), which is at the southern section of the neighborhood, and south of the proposed project. Traffic along Broadway Boulevard in the project area is highest north of Gibson Boulevard headed into downtown

[51] The EPA has proposed reducing the federal standard for PM2.5 to 12 $\mu g/m3$, following guidance from their scientific advisory committee. This is important because historic assessment of air pollution is based on prior standards. Assessment of future projects and conditions should be based on new standards that are coming into practice.

(17,000 vehicles), and is generally greater than traffic on Second Street. Traffic data for local roads are unavailable, and all of the roads between Second and Broadway Boulevard in and around Gibson Boulevard are considered local roads.[53]

In terms of what types of vehicles are traveling on these roads, MRCOG maintains limited vehicle classification data; only about 30% of traffic volume counts also collect vehicle classification counts. Table 7 reflects the total traffic volume by vehicle type for a very limited number of streets in the project area.

Table 7. Percent of traffic counts by vehicle type[54]

Street segment (year of count)	**Auto**	**Heavy trucks**	**Pick-up / Bus / 2-axle**	**Motorcycle**
2nd St, south of Avenida Cesar Chavez (2010)	65%	5%	29%	<1%
2nd St, south of Woodward (2012)	72%	4%	24%	<1%
Broadway Boulevard, south of Woodward (2011)	59%	11%	30%	<1%
Broadway Boulevard, north of Avenida Cesar Chavez (2009)	64%	8%	27%	<1%
Gibson Boulevard, west of I-25 (2010)	71%	7%	21%	<1%
Source: Mid-Region Council of Governments, 2009-2012.				

Most vehicles on these roadways are cars, but there is a large proportion of heavy trucks on Broadway Boulevard. Local residents say the official counts may undercount the trucks actually using these streets.

The environmental assessment listed traffic congestion as a main reason for the proposed extension. But the project area does not appear to suffer from traffic congestion, with a few exceptions, such as Rio Bravo Boulevard west of I-25. The MRCOG report "A Profile in Congestion" indicates:

- West of I-25, Gibson Boulevard has "minor" congestion
- West of I-25, Rio Bravo Boulevard has "severe" congestion to Second Street
- Second Street and Broadway Boulevard have no or minimal congestion

Planners expect Rio Bravo Boulevard will get more congested with future population growth. The level of congestion should be considered relative to the Albuquerque region and reflects conditions across the peak period only.[55]

Noise

Sound is frequently described in terms of peak levels or as an average over varying time periods. The City of Albuquerque Noise Ordinance[56] sets maximum allowable noise levels for residential areas as 55 A-weighted decibels, or dBA, in the daytime and 50 dBA at night (A-weighted decibels express the relative loudness of sounds. High frequencies, which our ears are more sensitive to, are given more weight.) For industrial areas the maximums are 75 dBA in the daytime and 70 dBA at night. Bernalillo County sets maximum levels for residential areas as 55 dBA in the daytime and 45 dBA at night, with the same higher levels for industrial areas as in the city. The County also has specific regulations for motor vehicles.

No noise data are available for San Jose. The environmental assessment identifies noise sources in the vicinity as traffic on I-25 and Broadway Boulevard, aircraft at the airport and Kirtland Air Force Base, trains on the rail spurs servicing the bulk fuels terminals, and noise associated with industrial and commercial activities of the area. Similarly, the Albuquerque/Bernalillo County

Comprehensive plan found excessive noise levels near several residential areas, specifically in neighborhoods near the airport, adjacent to I-25, by certain arterial streets, as well as industrial areas. However, staff at the city's planning and environmental health departments were unable to provide the data behind these findings or more recent information, highlighting an opportunity for stronger data collection and publication.

Why It Matters: Exposure to environmental hazards affects health and well-being, particularly for vulnerable populations

Exposure to Air Pollution
The EPA identifies six criteria air pollutants that can be detrimental to human health, and for which the EPA is required by the Clean Air Act to set standards to protect public health and welfare. They are ozone, carbon monoxide, particulate matter, nitrogen dioxide (NO2), sulfur dioxide, and lead. The EPA also identifies six priority mobile source air toxics but there are no standards for these contaminants, which include benzene, butadiene, formaldehyde, acetaldehyde, acrolein, naphthalene, and diesel exhaust.

.Information about current levels of criteria air pollutants comes from a network of air quality monitors across the nation. Exposure to air pollutants at levels below existing standards also may result in health impacts for those with existing health conditions. The EPA regulates both mobile and stationary emissions of these pollutants. A 2013 study reported that that very few monitors used to enforce the priority air pollutant standards are located near populations along high-volume roadways, adding that although "current federal law requires 'hotspot' analysis for CO and PM2.5 when building new transportation infrastructure in non-attainment areas there is currently no method to enforce possible violations of the NAAQS alongside existing transportation corridors or in attainment areas lacking air quality monitors."[52]

Studies on the health effects associated with distance from traffic look at air pollutants as a mixture to examine their cumulative effects.[57] In 2008 a report by the Health Effects Institute concluded that current evidence is sufficient to say that exposure to traffic-related air pollution exacerbates asthma. The report adds that although evidence is yet sufficient, traffic-related air pollution could cause onset of childhood asthma, non-asthma respiratory symptoms, impaired lung function, and premature death.

Studies link vehicle emissions to lung disease;[58] asthma symptoms;[59,60,61] medical visits for asthma;[62] asthma prevalence and incidence;[63,64,65,66,67] and heart disease.[68,69] It's not yet possible to attribute the cumulative effects of roadway proximity and non-cancer health effects to one or more specific kinds of vehicles or pollutants. Table 8 is a summary of health effects of selected urban air pollutants relevant to the proposed extension.

Table 8. Summary of health effects of selected urban air pollutants relevant to Sunport

Pollutant	Examples of Sources	Health Effects	Maximum Allowed*
Nitrogen Dioxide (NO_2)	Combustion processes in vehicles and industrial operations	Increased risk of acute and chronic respiratory disease; reduced visibility.	100 ppb (1hr) 53 ppb (annual average)

Table 8 (continued)

Pollutant	Examples of Sources	Health Effects	Maximum Allowed*
Particulate Matter ($PM_{2.5}$)	Motor vehicles, fireplaces, cooking stoves, power generation, construction, and industrial activities	Impaired lung function; exacerbation of acute and chronic respiratory ailments including bronchitis and asthma; excess emergency room visits and hospital admissions; premature arteriosclerosis; premature death.	15 ug/m3 (annual average)
Diesel exhaust	Diesel engines	Probable increased risk of cancers (see: International Agency for Research on Cancer list for Group 2A substances). Health effects associated with particulate matter (see list above) that is emitted in combustion.	N/A

** Under Federal Air Quality Standards*

Air quality does not affect everyone the same way, and some groups are more sensitive to adverse health effects. Groups of people that are particularly sensitive to the health effects of air pollutants include the elderly and the young, those with asthma, and groups with other exposures linked to cardiovascular or respiratory diseases.[70] Poorer populations and people of color tend to live closer to sources of air pollution, and poverty may increase susceptibility to the health effects.[71]

Exposure to noise

According to the World Health Organization's Guidelines for Community Noise,[72] which reviews a substantial amount of the research on noise and health, long-term exposure to moderate levels of noise can harm sleep, school and work performance, raise blood pressure and increase the chance of cardiovascular disease. A significant body of research in that report and in other public health literature looks at traffic noise. According to the literature:

- *Sleep:* Traffic noise has been linked to poor sleep.[73] A lack of sleep may have consequences including fatigue, impaired endocrine and immune system and psychological effects.[74]
- *Annoyance:* Reports of annoyance are the most widely studied noise impact[75] and the relationship has been quantified.[76] Annoyance is related to several health effects associated with noise, including elevated blood pressure, circulatory disease, ulcer and colitis.[75]
- *Learning and educational performance:* Chronic road noise can affect cognitive performance of children, including attention span, concentration, memory and reading ability.[77,78]
- *Hypertension:* Traffic noise and high blood pressure have a dose-response relationship; increased traffic noise increases the likelihood and severity of high blood pressure. .[79] People who live near chronic road noise (more than 20,000 vehicles a day) are twice as likely to have hypertension – men almost four times as likely.[80]
- *Heart attack:* Increases in neighborhood noise, including traffic, at levels above 50 to 60 dBA increase the risk of heart attack.[81,82,83,84]

Review of Environmental Assessment: The assessment of impacts Sunport Boulevard Extension will have on air quality, noise and cumulative impacts is incomplete

Air Quality
The environmental assessment and accompanying air quality review state that the EPA designates Bernalillo County as an attainment area for all air pollutants identified in federal standards, and that previously carbon monoxide was the largest pollutant of concern in the county. However, the discussion of traffic-related air quality impacts focuses solely on carbon monoxide notably omitting nitrogen dioxide and PM2.5, which are associated with traffic. These could also be assessed to understand whether overall emissions and exposure levels may change. Focusing attention on a pollutant that is already successfully managed obscures more significant hazardous pollutants that are less well managed, including ozone and particulate matter.

Importantly, federal standards for maximum acceptable levels of both nitrogen dioxide and PM2.5 were recently lowered, reflecting scientific consensus that current standards do not protect health. While the county's modeling methodology for carbon monoxide is acceptable, there are no baseline monitoring data reported for any of these other pollutants, nor are traffic data modeled to show emissions for these pollutants in the future.

The additional discussion about industrial pollution in the air quality review states that industrial pollutants are a potential concern, but then places responsibility on the airport and other sources outside the project sponsor's control. Little data are presented to support this assertion. Also, there is no discussion in the original EA of how extension and associated development will contribute to air pollution. Nor is there discussion of whether the cumulative impact of these hazards will exceed existing standards.

Alleviation of traffic congestion in the region is argued as a main reason for the project. However, the environmental assessment does not provide any data to show existing congestion. The Mid-Region Metropolitan Planning Organization and Mid-Region Council of Governments of New Mexico identify a set of measures and criteria that are used to illustrate current congestion (volume-to-capacity ratio, speed differential, crash rates, daily volume, delay analysis).[35] Traffic volumes are the only data the assessment cites to support the assertion of current congestion. Also notable is that the original assessment only identifies congestion outside the project area, though MRCOG makes congestion data available for both Gibson Boulevard and Rio Bravo Boulevard (see above), two places in the project area but not included in the original EA.

Another reason for the extension, according to the environmental assessment, is to increase access to the airport via Sunport Boulevard to "[benefit] the proposed industrial corridor in the area and [provide] incentive for light industrial development."[36] The envisioned industrial development would be in the southern portion of the neighborhood, stretching from east of Second Street to west of I-25, and south of Woodward Road, along the neighborhood's more heavily trafficked streets. Any future plans, such as the proposed extension, must balance economic opportunity with protection of health and safety.

Noise
There is no analysis of current noise exposure in the environmental assessment, and therefore we are unable to say whether the area will comply with federal or local noise standards once the project is built. Also, as with all analyses in the environmental assessment, there is no discussion of the potential impacts that future development enabled by the extension will have on noise in the adjacent neighborhood.

Cumulative Impacts
Discussion of cumulative impacts of the project focuses on how the project will benefit the neighborhood by alleviating future congestion, improving the transportation network and future pedestrian/bike networks and encouraging economic and commercial growth. However, evidence is insufficient to support these assertions within the San Jose neighborhood.

The assessment also does not examine how changes resulting from the extension could have harmful cumulative impacts. For example, the report says the Sunport will enable economic development by providing access to businesses, but does not discuss how increased traffic, truck emissions, or other hazards might result. The original assessment states only that "No significant cumulative impacts are anticipated from the Preferred Alternative."

Furthermore, in describing recent projects in the area, the discussion only focuses on transportation-related projects and how those have improved the area. There is no recognition in the original EA of how transportation or land use (for example, the 17 permitted stationary sources of air pollution) has contributed to San Jose's status as an environmental justice community. Nor is there recognition of disproportionate environmental burdens that may be made heavier by the extension, or that existing air quality monitors may be insufficient to comply with recent EPA requirements that air monitors be located near highest, instead of average, source of pollution. Finally, there is no discussion of how the project may influence community exposure to multiple pollutants.

In sum, in the environmental assessment there seems to be a limited understanding of how to look at cumulative impacts. Various hypothesized benefits of the project are discussed as "a cumulative impact" in alternative transportation or in economic development. No supporting analysis or data are provided to show how these benefits may accrue.

Resident Analysis: Air quality and cumulative impacts are projected to worsen with the arrival of the Sunport Boulevard Extension

In reviewing the data, literature and analysis of the original environmental assessment, the resident panel reached consensus on the following set of findings for cumulative impacts and air quality. Though noise was important, the panel recognized there was very limited information on which to make judgments about how noise might change as a result of the project.

Consistent with thinking about cumulative impacts, the resident panel believed it was important to consider not only the contribution to environmental hazards of the proposed extension, but also of all the commercial and industrial development that would be enabled by it. To focus only on the effects of the extension itself would perpetuate the short-sighted pattern of failing to consider cumulative effects of environmental hazards.

In this context, the resident panel considered existing qualitative and quantitative information, as well as personal experience, to reach consensus about the impacts of the proposed extension and development spurred by it. Panel analysis includes the following:

- The evidence is *moderate to strong* that cumulative environmental hazards – and hence air quality – will worsen due to the Sunport Extension and all of the associated commercial development that will result from the Sunport being built.
- These increases are *certain*, as the Sunport will open the door to businesses locating in the area, with accompanying increases in trucks and other traffic.

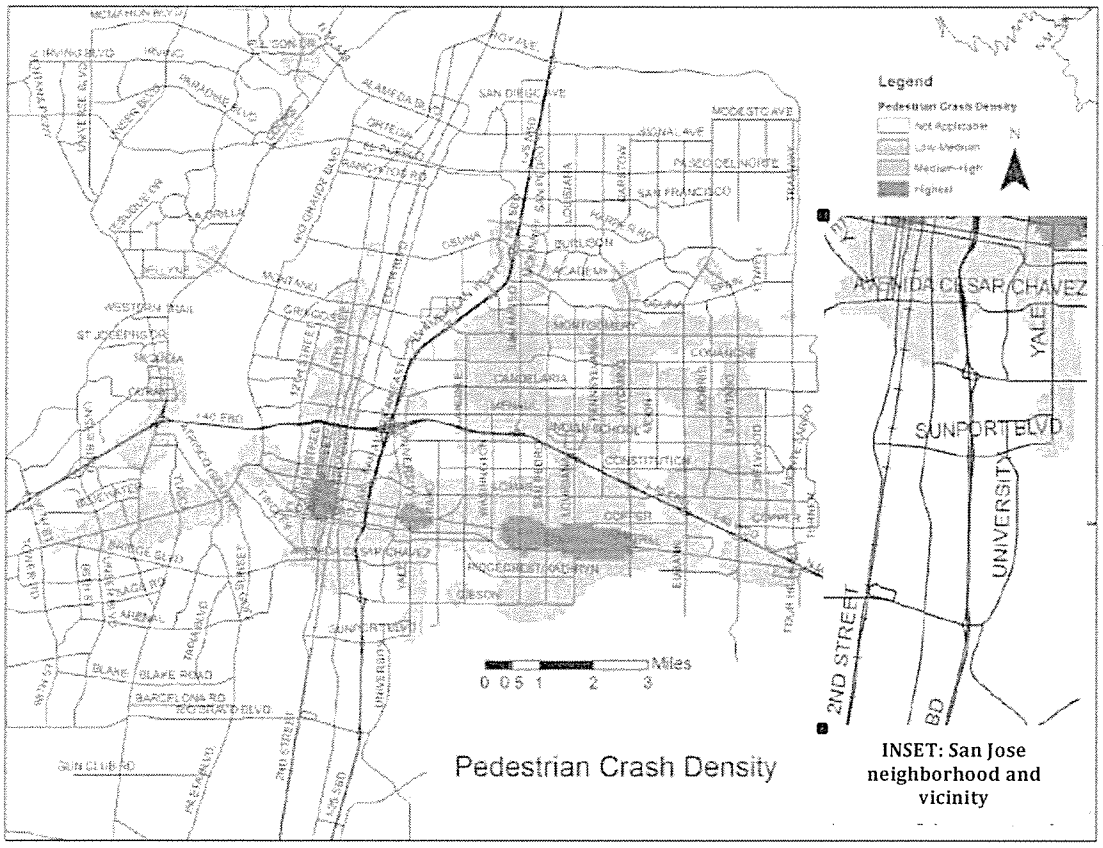
- Using the limited information available about future exposures, any increases in environmental exposures are *likely* to harm the health of residents, particularly those who are low income, the elderly and young, pregnant women and their unborn children, those living closest to the hazards, and those with underlying health conditions.
- Using the limited information available about future exposures, most people in San Jose – more than 70 percent – will be affected by these impacts, and the effects will range from *moderate to severe* depending on existing vulnerabilities.

IV.B. Safety from Injuries and Collisions

Existing Conditions: Pedestrian and bicycle crashes are relatively infrequent in San Jose, and facilities for walking and bicycling are scarce

Traffic-related deaths are slightly higher in the area that includes San Jose, as compared to Bernalillo County – 3.2 pedestrian deaths per 100,000 residents, compared to 2.7 per 100,000 in the county). In absolute numbers, there have been relatively few collisions between vehicles and pedestrians reported in recent years in San Jose. Map 7 shows where crashes involving pedestrians cluster in Albuquerque. In San Jose, the north edge has a low-medium cluster and elsewhere in the neighborhood there are no clusters recorded for crashes involving pedestrians.

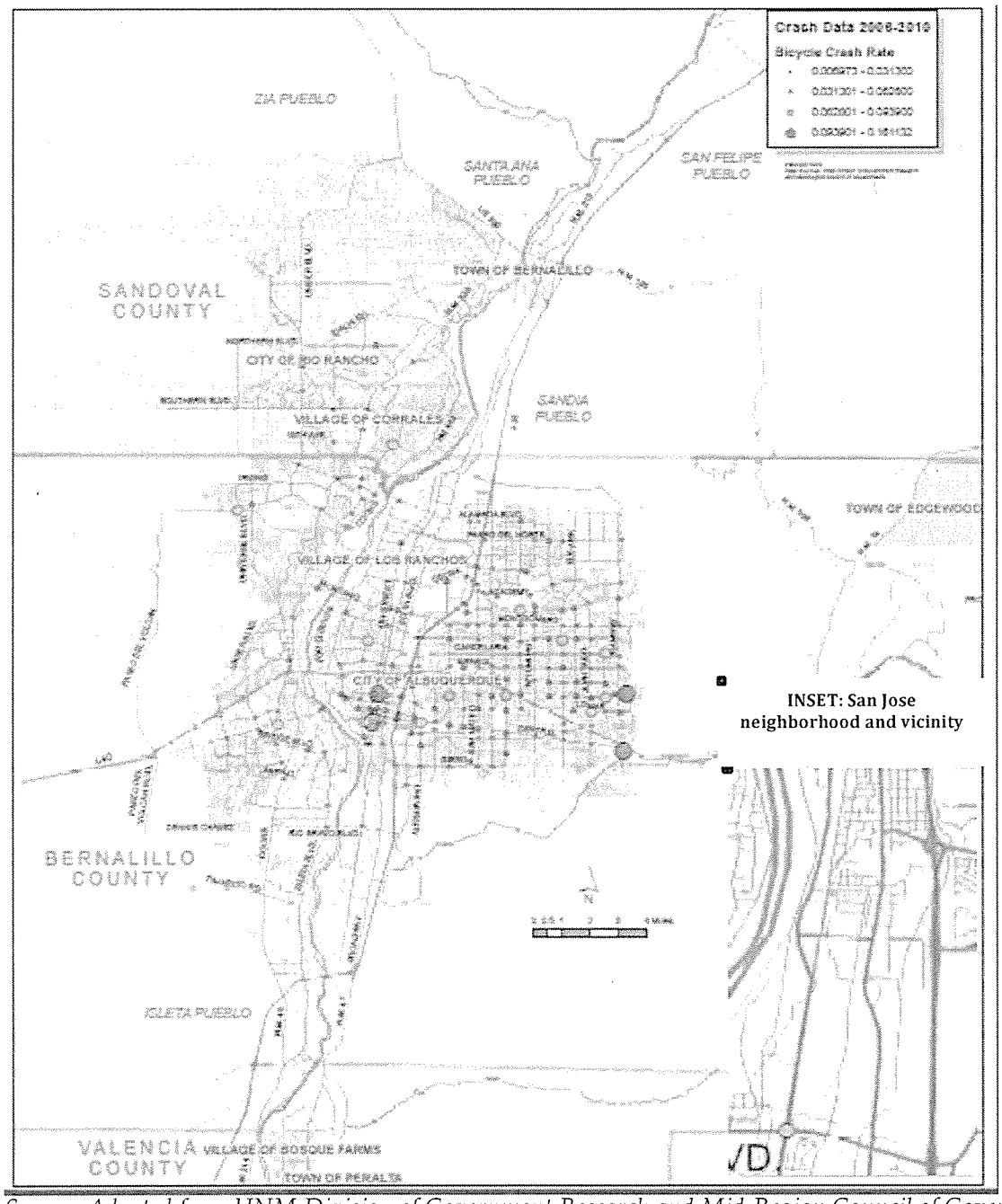
Map 7. Pedestrian crash density, 2000-2010



Source: Adapted from Mid-Region Council of Governments, July 2012.

A relatively low rate of crashes involving bicyclists is reported for San Jose compared to the county. Map 8 shows the intersection of Rio Bravo Boulevard and Second Street, where crashes tend to occur in the project area.

Map 8. Bicycle crash rate, 2006-2010



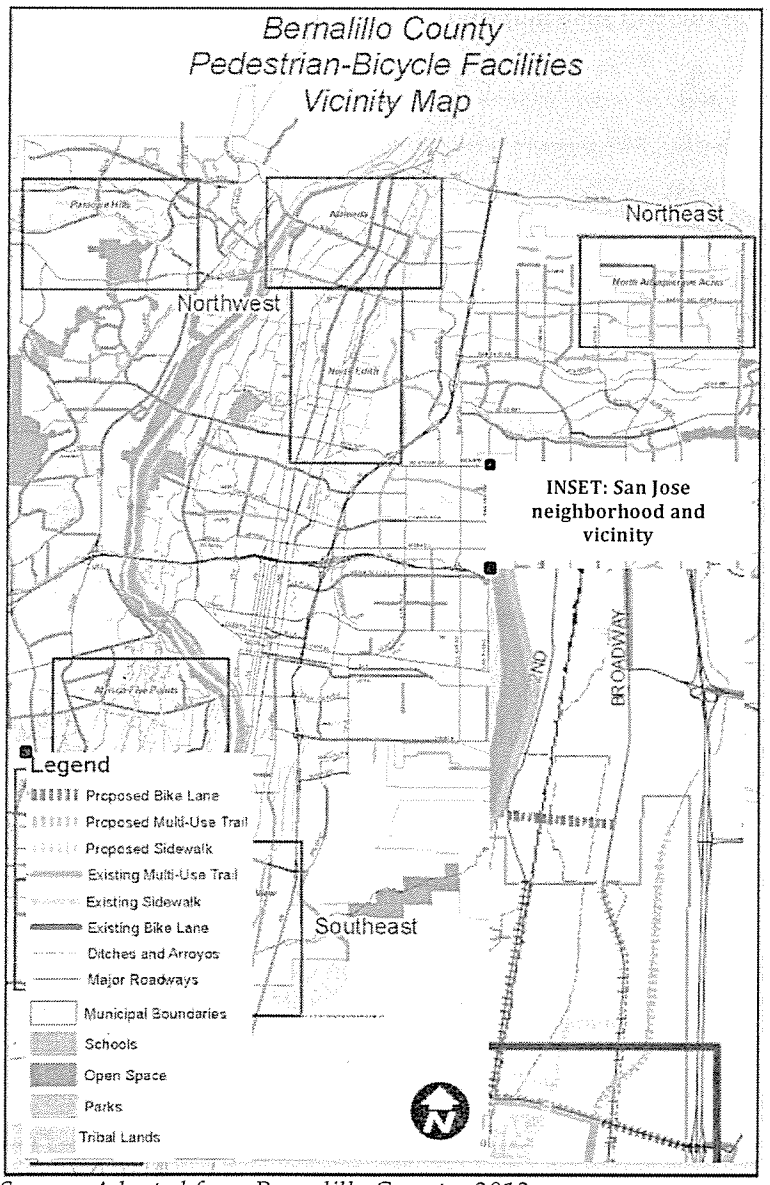
Source: Adapted from UNM Division of Government Research and Mid-Region Council of Governments, February 2013.

A chief cause of crashes is the absence of facilities for pedestrians and bicyclists, such as sidewalks and bicycle lanes. There are few sidewalks or designated bike lanes in the neighborhood, and little connectedness between those that do exist, as illustrated in Map 9. The project area currently has three blocks with designated bike lanes (on Broadway Boulevard from Kathryn Avenue to Gibson Boulevard). There are additional spaces for bicycling, but they

are not designated lanes. In these instances, cyclists are given a wide shoulder (as on Rio Bravo Boulevard), or can ride on what's known as a bike route, designed with the intention that bicyclists and cars share it (as for 3 blocks on Edith Boulevard).

Among facilities that do exist, access is a problem. To get to these spaces, bicyclists who start in the neighborhood ride with cars on streets lacking designated lanes, wide shoulders, or bike routes. Access also is an issue for the multi-use Paseo del Bosque Trail – also called the Riverside Bike Path – adjacent to the Rio Grande. For residents of San Jose, the trail is west of Second Street, so they have to cross the railroad tracks and property and walk or bicycle to an access point, such as the heavily trafficked Rio Bravo Boulevard.

Map 9. Current and proposed future pedestrian and bicycle facilities in Bernalillo County

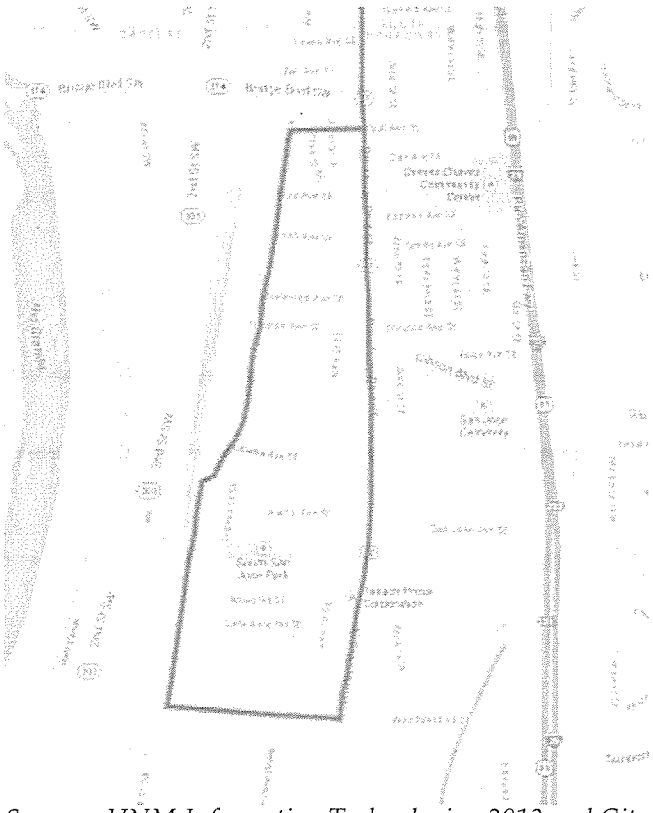


Source: Adapted from Bernalillo County, 2012.

Why It Matters: Safety affects use and the health benefits from it

People walk or bicycle for various reasons, including recreation, to get to work and school or to run errands, or as part of a journey that also includes trains or buses. For some, particularly those without access to private vehicles, walking, bicycling and/or public transit become important means of transportation. This is the case in San Jose, where approximately one in 12 residents do not have access to a car. One in 16 use public transportation to commute to work – a proportion three times higher than in the county as a whole. Four bus routes serve San Jose, though only one (the 16/18 "B-U-G") goes downtown every day. The route in the neighborhood follows a loop through the neighborhood that includes more heavily–trafficked streets, such as Woodward Road and Broadway Boulevard, so that users must walk or bike on or across these streets to reach the bus stops.

Map 10. Bus route for Route 16/18 in the San Jose neighborhood



Sources: UNM Information Technologies, 2013 and City of Albuquerque, 2012.

People also walk or bike if there are "trip attractors" – schools, parks, healthcare institutions, restaurants, grocery stores or childcare. According to the Mid-Region Council of Governments, "In general there is a scarcity of restaurants, grocery stores, and other retail that is associated with generating pedestrian activity" in the San Jose neighborhood.

Walking and bicycling are good for public health. Physical activity can help prevent or treat overweight or obesity; reduce risk of chronic diseases, such as cardiovascular disease, type-2 diabetes, and some cancers; improve mental health; and increase chances of living longer. Walkable neighborhoods are more likely to meet national physical activities guidelines compared to the least walkable neighborhoods.

It is important, then, to understand factors that may promote or threaten safety from injury for pedestrians or bicyclists. Key factors are the speed of traffic, types of vehicles, characteristics of the user, and road design.

A 2004 report by the World Health Organization and World Bank finds "a large amount of evidence of a significant relationship between average speed and crash risk." Specifically, for every 1 kilometer per hour (approximately 0.6 mph) increase in traffic speed, there is a four to five percent increase in fatal crashes.[89] A pedestrian has a 90 percent chance surviving a car crash if the car is traveling 30 kilometers per hour (approximately 18 mph) or less. That pedestrian has a less than a 50-50 chance of surviving if the car is traveling 45 kilometers per hour (approximately 28 mph) or more.[89]

The speed of cars on the extension and adjacent roads are important to collisions and resulting injuries to pedestrians and bicyclists in the neighborhood. On Interstate 25, it is legal to drive 75 mph outside of Albuquerque, and 65 mph inside the city limits. The extension is designed for 45 mph, so drivers will have to quickly reduce speeds upon entering the San Jose neighborhood. Speeds within the neighborhood are further reduced depending on the particular roadway. For example, currently the speed on Broadway Boulevard is 40 mph.

Research finds that the type of vehicle "strongly influences" risk of severe injury and pedestrian death. The chance of a vehicle-related injury being fatal increases by as much as 370 percent when the vehicle is a truck. Even light trucks (vans, SUVs, pickups, etc.) are associated with three times higher risk of severe injuries for pedestrians than lighter cars, and two times higher mortality rates.[36]

The pedestrian matters, too – older people and children are particularly vulnerable as car speed increases. Road design also is important. The World Health Organization/World Bank report, "If separation (giving pedestrians protected places to walk) is not possible, road management and vehicle speed management are essential."

Good planning now can help prevent future collisions and the injuries that may result from them. The extension and surrounding streets can be designed to manage speed and ensure safety for pedestrians and bicyclists with traffic calming measures such as lower speed limits, more signals, sidewalks, bulbouts, speed bumps, traffic circles or chicanes, landscaped medians and marked pedestrian crosswalks. One expert says sidewalks "are an absolute necessity along all through-streets serving developed areas." He reported that accidents with pedestrians were 2.5 times more likely on streets without sidewalks than streets with them.[93] Other important features that can increase a sense of safety include trees on streets and space between streets and sidewalk, as by parked cars.[93] For bicyclists, bike lanes and routes reduce injuries or and crashes by half compared to roads without them.

Review of Environmental Assessment: The extension includes short stretches of sidewalks and a bicycle lane that will be isolated from the few existing facilities in adjacent areas, and impacts to bus access are not discussed

Impacts to Pedestrian and Bicycle Facilities

The preferred Woodward Road option would include 700 feet of sidewalks along the half-mile extension that will not connect to existing sidewalks. The same preferred option also includes a five-foot wide bike lane on each side of the extension. The environmental assessment does not say if the bicycle lane will run the entire length of the extension. The bike lanes will connect to

Broadway Boulevard and University Boulevard, but since those stretches of those two streets have no direct connectedness to other bike lanes, they would be isolated.

The assessment does not predict how the extension may change traffic volumes, collisions, or the usability of adjacent streets for pedestrians or bicyclists.

Impacts to Bus Access
There is no mention in the environmental assessment of how the extension would affect resident's access to bus stops and buses.

Resident Analysis: Pedestrian and bicyclist safety on nearby streets will decrease

In reviewing the data, literature and environmental assessment, the resident panel reached consensus on the following findings for safety from injuries and collisions. Overall, the panel seeks to maintain the relatively low number of deaths and to prevent future collisions, and residents agreed that safety from injuries and collisions is already a problem in San Jose. Panel analysis includes the following:

- The evidence is *likely, but more information is needed* that the extension will *decrease* safety on nearby streets. It will be more dangerous for pedestrians and bicyclists if the proposed extension is built as planned.
- Decreases in safety are *likely* to harm the health of residents, particularly those who are low-income, bus users, people lacking access to cars, children who walk or bicycle to school, and bicyclists.
- Most people in San Jose will experience these changes, and the associated health effects will range from *not severe* to *moderate.*

IV.C. Social Connectedness

Existing Conditions: Residents gather in both public and private spaces in the neighborhood and nearby and want to protect and improve these spaces

Social connectedness among residents of a given community is a measure of solidarity and the ability to translate social ties into common good.[48] Limited information is available on the social fabric of San Jose today. To fill this gap, we used qualitative research methods with a photo and mapping activity to gather input from the resident panel, based on their personal experiences.

Resident panelists had various perspectives about whether social connectedness is an issue today for the San Jose neighborhood. The panel agreed that whether residents feel that social connectedness is lacking depends on one's experiences, age, and where in the neighborhood one lives. Residents perceive that the neighborhood is less close knit now than in the past and that the neighborhood has a negative reputation, owing partly to crime, which remains relatively high although it has decreased over time. Some residents said they felt safe at night; others did not.

All residents on the panel agreed that social connectedness is valuable. They also agreed that future activities that directly or indirectly affect the neighborhood should seek to improve social connectedness.

Answering two sets of questions about San Jose today, residents wrote responses that Human Impact Partners then grouped into themes. We found two main themes. First, residents gather in an array of places in or near the neighborhood, including private spaces like churches or homes of friends and family as well as public spaces like community centers, schools, parks or playgrounds. Second, residents want to protect and improve several aspects of the neighborhood – health facilities, markets, schools, workplaces, the ability to breathe and walk outdoors, safety from traffic, and the scenery.

Asked where residents gather, many named private spaces such as churches or homes, including the San Jose Parish as well as churches outside of San Jose. Churches were described as "the place community gather to worship-pray & grow in their faith," with others calling them "cultural assets to protect" and special places that represent the community or that "represent my people." One resident also spoke about access to church, wishing *"to be able to drive to the church, but more to be able to walk to the church and not breathing all those chemicals."* Homes of friends and family, again both inside the San Jose neighborhood and elsewhere in the city, are places that residents visit, eat, talk, and celebrate. No residents mentioned gathering socially at sporting events or arts events – two measures used in City of Albuquerque's Citizen Perception Survey to assess quality of life. Neither did they mention gathering at restaurants or bars.

Public spaces where residents mentioned gathering include the Herman Sanchez Community Center and public parks, though with reservations. Of the community center, one resident said it was a "good source of community" and multiple comments noted that children, in particular, use the center. One observation included, *"People take their children to the after/before school program - so their child does not go to an empty house after school."* In describing parks, residents identified them as places to gather for celebrations or for children to play, and expressed concerns about the safety of parks in the San Jose neighborhood. Comments included, *"[The parks] do not feel safe. Not clean,"* and one resident described going to a park outside of the San Jose neighborhood, saying it is far but that they do so because of problems in San Jose.

Looking at the other main theme about what residents want to protect and improve, physical aspects were mentioned. Residents want to protect health facilities and markets, as well as jobs and schools. Comments included, *"Protect health facilities,"* and *"we need to have an opportunity to excel learn and bloom."* Of jobs, one resident also said, *"we need to hire even those with a criminal conviction."* About aspects to improve, they included both daily needs and conditions in the physical environment of the neighborhood. One resident said, "[*Market*] *is needed.*" Speaking to neighborhood conditions, residents said currently, the trains' contamination and noise affects the ability to breathe and walk in the area, identifying it as an area for improvement: *"[Improve] Because of the noise. Because the black powder enters the house."* Two powerful statements from residents capture the sentiment well. They said, *"Our view of the scenery is sacred"* and *"We need to protect the health safety lifestyle of the people that live in the community."*

Why It Matters: The social fabric of a neighborhood is associated with myriad health-related factors

Social connectedness shapes factors that influence individual health behaviors and ultimately health outcomes. It is a buffer to stress and influences health status itself.

A 1998 study using national data reported that higher levels of social mistrust were associated with higher levels of violent crime involving guns.[96] The relationship also went the other way: Neighborhoods with higher rates of group membership had lower levels of gun crimes.[96]

Neighborhood social connectedness influences individual behaviors. In a 2008 study of six U.S. communities, less socially cohesive neighborhoods were associated with behaviors like increased depression, smoking, and not walking for exercise. The study adjusted for a bevy of factors like socioeconomic characteristics, neighborhood problems, and race and ethnicity.[97]

Social connectedness or social capital – the benefit gained through cooperation – also influences individual health outcomes. Research has shown that social capital is associated with lower levels of general health and well-being, lower cardiovascular and cancer mortality, lower suicide rates, and lower rates of violent crime.[97]

This also is reflected in the relationship between social connectedness and overall health. A 2006 journal article found that people who reported a severe lack of social support were more than twice as likely to report fair or poor health than people who said they did not lack social support.[98] Looking at it another way, people living in communities with high levels of social trust are four times less likely to report fair, bad or very bad health than people living in communities without it.[98]

The effect of social capital on health may vary with income level. A systematic review of literature on the interactions between social capital and socioeconomic inequalities found evidence in a dozen studies that social capital might buffer negative health effects of low socioeconomic status and in five studies that social capital has a stronger positive effect on health for people with a lower socioeconomic status.[97]

Review of Environmental Assessment: There is no analysis of impacts to social cohesion or connectedness

The environmental assessment report says: "The project is not expected to impact community cohesion . . . " It continues by describing topics covered elsewhere in this report, such as impacts to minority or low-income populations, but offers no evidence to support the assertion on cohesion.

Resident Analysis: The extension is unlikely to affect overall social cohesion

Based on personal experiences, residents predicted that social connectedness is likely to stay at the same level of low importance to the neighborhood if the proposed extension is built. One resident suggested that the extension could marginally bring together the neighborhood around efforts to understand and improve the project. However, the group said that it does not anticipate changes to social connectedness from the project. Residents added it is important in any future projects to protect and improve the places where people gather.

V. Recommendations For Sunport HIA

The recommendations below come from a variety of sources. Fourteen were developed by the HIA resident panel in response to their analysis of the impacts of the first environmental assessment released in September 2011. They are included here because they continue to be relevant to the significant issues that remain in the REA (as described in this document).

In making these recommendations, we take a broad perspective that includes both the half-mile extension itself and the future economic development that will follow. As such, many recommendations would be implemented after the proposed extension is built, and with an emphasis on preventing future environmental hazards.

Overall

1. The county should more thoroughly and transparently reconsider Alternatives D and H, not only Alternative A, and mitigations.

2. The city and county should improve public information-sharing about the proposed extension and related planning. Specific actions include:
   a. Publicly share plans to meaningfully involve the San Jose neighborhood in ongoing planning for the Sunport Boulevard Extension, to ensure that resident perspectives help shape future development.
   b. Increase communication between city and county, as well as directly to residents, including but not only through the San Jose Neighborhood Association, and ensure communication is in culturally appropriate methods and languages. Publicly and immediately share formal and informal plans for the extension and development in the surrounding area. Specifically, share information on whether there is a vision – and what it is – for promotion of commercial and industrial development along the extension, such as zoning documents or plans ranging from the short-term to long-term (e.g., five-year plans, thirty-year plans, and so forth).

If the Sunport Boulevard Extension is built:

Environmental Hazards

3. The city and county should require that future permitting processes for the San Jose neighborhood include the completion of cumulative impact assessments that more accurately consider health impacts. Cumulative is defined in the spirit of the Environmental Protection Agency definition for the NEPA process, as *incremental environmental impacts of an individual project combined with the environmental impacts caused by past projects, the environmental impacts caused by other current projects and the environmental impacts caused by reasonably foreseeable future projects.*

4. The City of Albuquerque Air Quality Division should improve air quality monitoring and enforcement of existing air quality regulations in the San Jose neighborhood as follows:
   a. Collect baseline information throughout the neighborhood on actual air quality emissions. If the information is collected by City or County agencies, it should be validated by outside organizations.
   b. After the extension is completed, regularly monitor air quality at sensitive sites such as schools and community centers. Commit to retrofitting these facilities (e.g., provide upgrades to building thermal performance and ventilation systems) to keep indoor air pollutant levels below applicable state and federal standards, and mitigate exceedances found at baseline levels, if pollution levels surpass what is harmful to human health.

c. Add an air monitor in San Jose where vulnerable populations congregate. The monitor should measure the six criteria pollutants (ozone, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide, and lead), as well as volatile organic compounds.

5. The city and county should ensure compliance with and enforcement of existing noise standards. To do so, the city and county should collect baseline noise measurements in the community of San Jose to ensure standards are not being exceeded.

6. The city and county should consider revising noise control ordinances to set the standard for traffic-related noise, at 65 dBA or less for daytime and 55 dBA or less for nighttime.

Safety from Injuries and Collisions

7. The city should prohibit heavy trucks on residential streets in San Jose neighborhood.

8. The city and county should implement appropriate traffic calming features to slow trucks on roads that will see increased traffic from the Sunport Boulevard Extension.
   a. Examples of traffic calming to consider are reduced speed limits, rumble strips, and landscaping.
   b. Example locations for reduced speed limits are Broadway Boulevard traveling down the hill by Bethel Avenue and San Jose Avenue.

9. The city and county should create facilities to protect and encourage pedestrians and bicyclists on roads near the Sunport Boulevard Extension that will experience increased traffic during and after its construction. Actions include:
   a. Building sidewalks with storm drainage. Example locations are Broadway Boulevard headed to Woodward Road, on Wesmeco Drive, on Arno Street, and John Street.
   b. Extending the bike lane on Broadway further into the San Jose neighborhood.
   c. Adding traffic lights at the intersections of William Street and Woodward Road, as well as Second Street and Woodward Road.[c]

10. The City of Albuquerque Transit Department should ensure that the 16/18 bus route is maintained during and after construction of the Sunport Boulevard Extension. Also, the city should build bus shelters where the bus is used but there are not currently shelters to protect riders – for example, on William Street, Woodward Road, and Broadway Boulevard.

Miscellaneous Recommendations

11. Bernalillo County Public Works should include drainage facilities when building the Sunport Boulevard Extension.

12. To advance the economic prosperity of residents in the San Jose neighborhood, the Bernalillo County Economic Development Department should require businesses locating along Sunport Boulevard Extension to develop plans and commitments for local hiring, job training, and educational programs. For example, the city and county could work with businesses to start a GED program with instructors in the community that is free for low-income residents of the San Jose neighborhood.

[c] Two members of resident panel abstained from this vote

13. To ensure San Jose residents are actually able to access workforce development and job training programs as well as access new jobs created in the community, the Bernalillo County Economic Development Department should require that businesses locating along Sunport Boulevard Extension *not ask* about applicants' history of arrest in job applications and interviews.[4]

14. The Bernalillo County Economic Development Department should establish a living wage (e.g., modeled on the living wage ordinance in Santa Fe) and require jobs created by businesses relocating or locating along the Sunport Boulevard Extension to pay such wages. In addition to paying a living wage, all permanent jobs (including part-time and full-time permanent jobs) created by business located near the extension should provide full health benefits.

Additional Recommendations

At the conclusion of the HIA process, the Steering Committee and project partners proposed additional recommendations to supplement those from the resident panel. These recommendations were not vetted in the same way, but are listed here as they provide valuable suggestions for appropriate parties to consider as well.

They include:

- Consider completing an Environmental Impact Statement to more fully assess the environmental impacts of the extension on environmental and human health, including reasonable alternatives (including a No Action alternative) that would avoid or minimize adverse impacts or enhance the quality of the human environment.

- The county, MRCOG, or other appropriate party should do a comprehensive traffic study that includes roadways connected to or near the extension that will be affected by it. The study should assess changes in traffic and how those are expected to affect air quality and noise. The study should consider potential short-term and long-term development (e.g., five-year plans, thirty-year plans, and so forth) that will and/or could take place if the extension is built.

- Absent discussion of cumulative impacts in this document, planning agencies and other authorities could consider a moratorium on approving projects that will result in new environmental hazards in the community.

- The city and county should draft relevant plans and commit funding to ensure pedestrian- and bicycle-safety measures and improvements on roadways such as Second Street that connect to the extension and will experience increased traffic or congestion, regardless of the alternative chosen. Plans should redesign these roadways for neighborhood pedestrian, bicycle, and vehicular safety, and to avoid increased cumulative air emissions. This should be done prior to completion of the extension in this environmental justice community.

- A specific way to implement the Steering Committee recommendation about public input is for the county to form and fund a Community Advisory Council that regularly provides input and feedback on plans for the proposed extension.

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[4] There was not unanimous agreement on this proposal; however, the majority of residents on the resident panel voted in favor of it.

- Improvements to pedestrian and bicycle facilities on adjacent roadways that the extension will affect, such as Woodward Road, should be put in place when the extension is built.

- The County should consider building sidewalk adjacent to the entire length of the extension, rather than for only 700 feet.

- The appropriate body should provide voluntary relocation of residents living in housing that is the closest to the extension.

- The appropriate body should involve impacted residents in identifying requirements for developments within the boundaries of the Design Overlay Plan.

VI. Conclusion

This HIA shines a light on numerous environmental and social conditions – including environmental exposures, safety, and social connectedness – in the San Jose neighborhood that could be affected by the proposed extension. In light of these findings and based on their own experiences in the community, residents are definite in their belief that air quality and safety will worsen as a result of the extension and the industrial and commercial development that will follow.

Numerous questions remain for the residents of San Jose: Are the purpose and need for the project transparent and being met? Will the Sunport Extension be further developed to the west of Rio Grande? Will new environmental hazards be introduced? What benefits will residents experience? Will community health and exposures get worse or better? What will the city and county do to protect the most vulnerable?

The community engagement process for the extension and the draft environmental assessment leave these questions unanswered, and have not facilitated trust within the community that such issues will be addressed in the future. Consequently, we suggest a more precautionary approach for the city and county. We propose a set of recommendations to mitigate the potential harms that may result from the extension and the development it will enable, as well as a series of recommendations that create opportunities for improved heath and well-being for the residents of San Jose. Over time, we intend to monitor whether these recommendations are adopted and implemented in response to the concerns raised herein.

As project proponents, the City of Albuquerque and Bernalillo County have a duty to consider how residents and neighborhoods will be protected from new harms that result from the development they advocate. With San Jose's long and well-known history of environmental hazards and poor health, now is an opportune time to consider whether a *no new hazards* approach is warranted for the neighborhood. Such an approach would begin the process of reassuring community members that their health and well-being – now and in the future – are valued and prioritized in the community they call home.

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VIII. List of Appendices

Appendix A. Additional Key Planning Documents that Affect San Jose
Appendix B. Pathway Diagrams
Appendix C. Explanation of Terms Used in Resident Predictions
Appendix D. Overview of Sunport HIA process

Appendix A. Additional Key Planning Documents that Affect San Jose

Area plans: Two area plans, in particular, are of interest. Adopted in 1998 and updated in 2000, the *Southwest Area Plan* sought to guide future development by addressing general land use, transportation, drainage, and public services. The original plan dates back to when the airport was still known as Albuquerque International and before ground was broken on Mesa del Sol. The plan is of particular relevance to the HIA because the environmental assessment cites it as one explanation for the extension. The current version of the plan also mentions a vision for "a major light industrial corridor with office and commercial uses is planned generally east of Second Street, south of Woodward Road, and west of Interstate 25," modifying a vision expressed in the original 1988 plan.

Also of interest is the *Bernalillo County/International Sunport Station Area Sector Development Plan*, adopted in 2009. The plan lays out a vision for the future for select areas adjacent to the Rail Runner train stationon Second Street. This vision includes human scale development, a multiuse area with access to employment and entertainment, and a safe pedestrian and bicycling environment. The southernmost edge of the San Jose neighborhood as defined for the HIA is in the boundary area for the station, meaning it is within a quarter mile of the station, although it is not immediately adjacent to the station and is not a main neighborhood focused on in the plan.

Complete Streets resolution and plan: Adopted in 2011 by the Mid-Region Council of Governments, the *Complete Streets resolution* aims to "safely mov[e] people of all ages and abilities along and across the roadway: pedestrians, bicyclists, motorists, and transit users. Complete Streets make it safe to walk to school, a nearby cafe, a senior center, or cross the street to reach a bus stop. Complete streets are made safe to bicycle to work, a neighborhood park or connecting trail."[§§] The Complete Streets resolution applies to the San Jose neighborhood, which is in the MRCOG jurisdiction. Similarly, a recently drafted *South Yale Complete Streets Master Plan* includes areas on Yale Boulevard that are north of Gibson Boulevard on the east side of I-25. It is mentioned here as a plan of interest; although just outside of the project area for this HIA, it provides a glimpse of recent efforts in a nearby neighborhood to improve conditions for all who use the roads.

Comprehensive plan: The comprehensive plan is the main planning document for the City of Albuquerque and unincorporated parts of Bernalillo County. Planning documents are ranked and the comprehensive plan is the top rank, meaning all lower ranking documents must be in accordance with the vision and guidance described in this plan.

Design overlay zone: The HIA project area is not in a design overlay zone; however, the space for the proposed extension is in the *Sunport Boulevard Design Overlay Zone*. The Design Overlay Zone controls signage.

Sector plans: The project area closely aligns with the neighborhood focused on in the *South Broadway Neighborhoods Sector Development Plan*, dating to 1986, and is part of an area today known as the South Broadway Redevelopment Zone. The plan declared the area blighted and set out to promote economic development and redevelopment. It also noted environmental concerns at the time about developing industrial zoned land in the neighborhood for heavy industry. Near the proposed extension, the neighborhood north of Gibson Boulevard SE,

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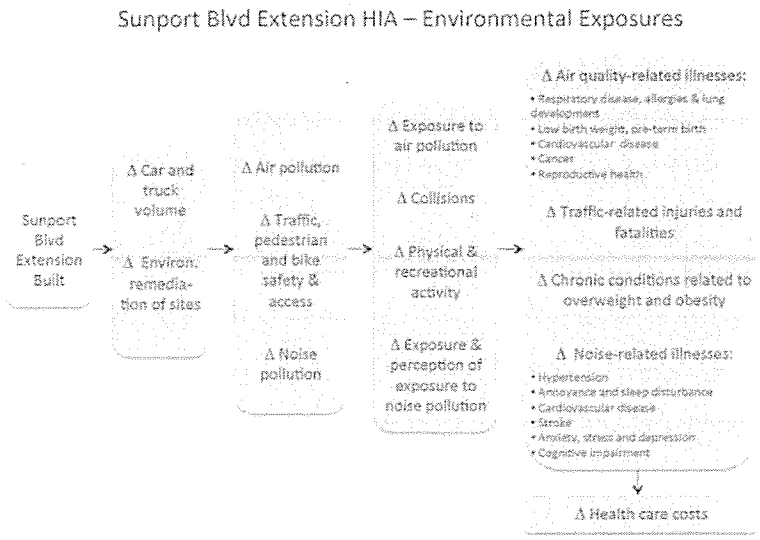
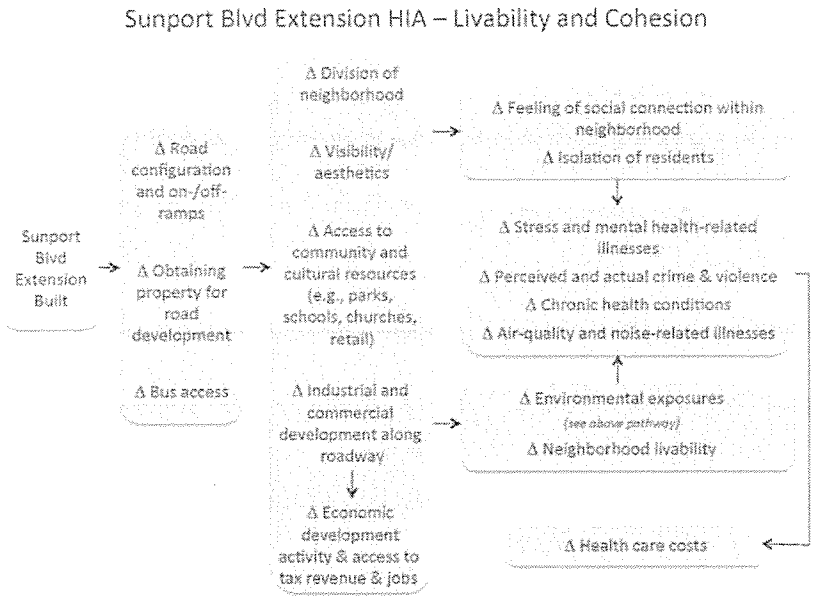
§§ Mid-Region Council of Governments. 2012. Bernalillo County Pedestrian and Bicyclist Safety Action Plan. Available at: www.bernco.gov/upload/images/public_works/pedestrian%20safety%20action%20plan%20(BCC%20final).pdf. Accessed October 25, 2013.

although not included in the HIA project area but near it, is in the *South Yale Sector Development Plan*, adopted in 2009.

Appendix B. Pathway Diagrams

The diagrams below illustrate the issues brainstormed for this project. Ultimately, residents prioritized the following topics for analysis: exposure to environmental hazards; safety from injuries/collisions; and social connectedness, with additional interest in economic development.





Appendix C. Explanation of Terms Used in Resident Analysis

Likelihood

- Certain = information says the extension definitely will cause changes or stay the same (causal)
- Likely = logically possible and has a lot of supporting information, though some uncertainty
- Possible = logically possible but with limited or uncertain supporting information
- Unlikely = logically not possible and lots of information against it

Severity

- Severely = potentially life-threatening or permanently disabling, or could affect sensitive groups like children
- Moderately = big effects on well-being, livelihood or general functioning
- Not severely = short-term effects that that are reversible or can be managed

Number of People

- Everyone in San Jose = around 4,000 people
- Most in San Jose = 7 out of 10 people in San Jose, or around 3,000 people
- Some in San Jose = half of people in SJ, around 2,000 people
- Few in San Jose = less than 1 in 10 people in SJ – 400 people or fewer

Appendix D. Overview of Sunport HIA Process

Following is a summary of the key steps of the Health Impact Assessment process as they apply to the Sunport Boulevard Extension Project HIA.

Screening: Deciding Whether To Do an HIA

Before the start of the HIA, from approximately September 2011 to January 2013, residents followed the environmental assessment process for the Sunport Boulevard Extension. In September 2011, Bernalillo County released an Environmental Assessment report about the proposed extension, finding that it was expected to have no significant impacts to the environment and health. Approximately six months later, in March 2012, San Jose neighborhood resident Esther Abeyta sent a letter on behalf of the San Jose Neighborhood Association to the Federal Highway Administration. The letter challenged the adequacy of the County Environmental Assessment, in particular around the assessment of environmental justice issues.

Screening for the HIA was primarily from February to April 2013. People and organizations involved in screening included: a resident of the San Jose neighborhood, members of Bernalillo County PLACE MATTERS, SouthWest Organizing Project, the New Mexico Health Equity Partnership–Santa Fe Community Foundation, and Human Impact Partners. In February 2013, Esther Abeyta began conversations with the New Mexico Health Equity Partnership–Santa Fe Community Foundation and Human Impact Partners about the potential value of a Health Impact Assessment on the extension and whether there was an upcoming decision that could benefit from the additional information an HIA could provide. The group started conversations with SouthWest Organizing Project and Bernalillo County PLACE MATTERS. Together, it was decided to move forward with the HIA after two additional letters were received. One was a reply from the Federal Highway Administration to Esther Abeyta in March 2013 saying the issue was being investigated and that the office in Washington, DC alerted both their New Mexico Division office and the New Mexico Department of Transportation about the matter. The other was a letter in April 2013 from the Federal Highway Administration's New Mexico Division to the New Mexico Department of Transportation that suggested changes to the Environmental Assessment report. From the HIA perspective this suggested a possible decision to inform. After this point, the group reached out to the New Mexico Department of Health while forming a project Steering Committee.

Scoping: Determining the HIA Research Focus

This HIA used a "rapid" approach to maximize community participation in a short timeframe. The approach included assembling a panel of 10 residents who were identified and invited by the Steering Committee as neighborhood residents potentially affected by the project. Panelists offered a sample of perspectives from residents in the neighborhood.

The panel convened two times, first on August 17, 2013 for five hours to learn about HIA, discuss the proposed Sunport Boulevard Extension project, and identify key questions on which the HIA would focus (also known in the HIA process as "Scoping"). The panel also refined diagrams hypothesizing the connections between the proposal and potential health outcomes that were drafted by Human Impact Partners and Steering Committee.

Key topics of focus for the HIA that came out of this first meeting included: exposure to environmental hazards, safety from injuries and collisions, and social connectedness.

The panel included both English- and Spanish-speaking residents and so the meeting included simultaneous English and Spanish interpretation and materials available in both languages. For

this meeting, the Steering Committee designed and helped facilitate a process in which the resident panel could learn, engage, and deliberate.

Assessment and Recommendations: Gathering Information, Making Predictions, and Identifying Strategies for Improvement

After the first meeting, the Steering Committee recruited subject matter experts and a researcher in the key topics of focus for the HIA. The experts included one health economist and assistant professor in family and community medicine from the University of New Mexico, and one retired air quality expert who previously worked also with the university, the Environmental Protection Agency, and the Albuquerque-Bernalillo County Air Quality Control Board. A HIP staff member with background in pedestrian and bicycle planning also spoke about research related to safety.

During a second meeting of the resident panel approximately one month later, on September 14, 2013, and that lasted for approximately eight hours, the subject matter experts and researcher spoke to these topics, and the resident panel reviewed existing conditions data collected by Human Impact Partners during the one month period. Using both sources of information, as well as reflecting on experience, the panel came to consensus on the likely impacts of the development on health, and identified a set of recommendations that could mitigate potentially negative health impacts.

As with the previous meeting, this second meeting was conducted simultaneously in English and Spanish, and the Steering Committee designed and helped facilitate a process in which the resident panel could learn, engage, deliberate, as well as come to consensus and provide data for residents to consider in their decisions.

Reporting: Synthesizing Findings

Human Impact Partners drafted this report based largely on the original environmental assessment and coordinated gathering feedback from experts from whom the Steering Committee invited review and comment. Those reached out to included subject matter experts from the in-person Scoping meeting, former staff of the County public health department, staff at the state public health department, and a representative of a neighboring community. San Jose neighborhood resident and Steering Committee member Esther Abeyta facilitated gathering feedback from the resident panel on the draft report. After the release of the revised Environmental Assessment report, and given a relatively short time period for review and public comment on it, an addendum was drafted to highlight lingering issues raised in this initial draft that seemed unresolved in the revised EA. This document will be submitted as public comment to the revised Environmental Assessment report.

Participation in Steps of HIA

The table below illustrates the capacity in which key stakeholders participated in the Health Impact Assessment process.

Step of HIA Process	Resident Panel	Subject Matter Experts or Researchers	Steering Committee	Human Impact Partners
Screening			L	L
Scoping				
Pathway development	P		P	L
Finalizing of issues to focus on in the HIA	L		P	P
Assessment				
Gathering existing conditions information				L
Review of existing conditions information	P		P	L
Conversation about key research	P	L		P
Literature review				L
Identification of likely impacts	L		P	P
Consensus on likely impacts	L		P	P
Recommendations				
Identification of recommendations	L		P	P
Consensus on recommendations	L		P	P
Identification of supplementary recommendations			L	P
Reporting				
Writing and finalizing				L
Review	P	P	P	
Monitoring / Evaluation *(to be done)*				

L = lead, P = participant

Esther & Steven Abeyta
2419 William Street, SW
Albuquerque, NM 87102

December 3, 2015

Peter Hinckley, URS/AECOM
6501 Americas Parkway, # 900
Albuquerque, NM 87110
peter.hinckley@aecom.com

Rodrigo Eichwald
Bernalillo County
2400 South Broadway
Albuquerque, NM 87102
rleichwald@bernco.gov

RE: Woodward Road project

Dear Mr. Eichwald and Mr. Hinckley:

We are writing to you concerning the proposed extensive expansion of Woodward Road, converting it from a neighborhood street adjacent to the GE superfund site and related contaminated properties, including abandoned, leaking underground storage tanks, and the Schwarzman pre-RCRA landfill. As you should recall, and we incorporate in this letter by reference, we submitted comments on what you have called the "co-dependent" and "related" Sunport Extension Project which have a direct bearing on what you are proposing for Woodward Road and its impact on us and the community in which we live.

Plainly, this project falls outside a "categorical exclusion" from the National Environmental Policy Act due to its size and impacts upon this community and the environment. Additionally, this project—again, by your own words cited above—is part and parcel of the entire group of road and road-related projects within the larger Sunport Extension Project. That means you have also failed to properly include all of these projects under a single Environmental Assessment [EA] properly addressing interactions and interconnections of the projects and, importantly, the cumulative impacts of the entire project.

As we did in the referenced comments, we again ask that this project, the Sunport Extension and all the related projects you listed in the Sunport Extension Project Revised EA be subject to a single environmental impact statement. We believe that your failure to do so is violation of the National Environmental Policy Act. We also think that it is not appropriate under the NEPA for you to go forward with the Woodward Project prior to completely addressing all of the comments that you received on the "related" and "co-dependent" Sunport Extension Project.

Please note that your response to these comments should be sent to Mr. Juan Reynosa and our attorney Jon Block. They are cc-ed below with their email addresses.

Thank you.

Esther and Steven Abeyta

cc: jblock@nmelc.org
juan@swop.org

INSTALLATION RESTORATION PROGRAM
PHASE I - RECORDS SEARCH

AIR FORCE PLANT NO. 83
Albuquerque, New Mexico

Prepared For

UNITED STATES AIR FORCE
HQ AFESC/DEV
Tyndall AFB, Flordia
and
HQ ASD/PMD
Wright Patterson AFB, Ohio

December 1983

Prepared By

ENGINEERING-SCIENCE
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NOTICE

This report has been prepared for the United States Air Force by Engineering-Science for the purpose of aiding in the Air Force Installation Restoration Program. It is not an endorsement of any product. The views expressed herein are those of the contractor and do not necessarily reflect the official views of the publishing agency, the United States Air Force, nor the Department of Defense.

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EXECUTIVE SUMMARY

The Department of Defense (DOD) has developed a program to identify and evaluate past hazardous material disposal sites on DOD property, to control the migration of hazardous contaminants, and to control hazards to health or welfare that may result from these past disposal operations. This program is called the Installation Restoration Program (IRP). The IRP has four phases consisting of Phase I, Initial Assessment/Records Search; Phase II, Confirmation and Quantification; Phase III, Technology Base Development; and Phase IV, Operation/Remedial Actions. Engineering-Science (ES) was retained by the United States Air Force to conduct the Phase I, Initial Assessment/Records Search for Air Force Plant No. 83 under Contract No. F08637-80-G0009-5009.

INSTALLATION DESCRIPTION

Air Force Plant No. 83, otherwise known as General Electric Aircraft Engine Business Group's Albuquerque Plant, is located in the southern portion of Albuquerque, New Mexico. The plant site is approximately one mile due west of Kirtland Air Force Base. The facility is comprised of approximately 30 major buildings which cover 586,790 square feet within a 33-acre area.

Surrounding land uses include residential to the north, heavy and light industrial to the west (including the Eidal Manufacturing Plant, which manufactures tractors; a vacant manufacturing plant; and a construction equipment storage yard), light industrial to the south (including a packing plant and an auto salvage yard), and light and heavy industrial and residential to the east (including Texaco's oil storage facility; a deep freeze locker storage facility; Conoco's storage facility; a vacant lot, and a small residential area). The area within one-fourth mile of the plant is populated by less than 1,000 people.

General Electric Company (GE) operates industrial facilities at Air Force Plant No. 83. GE has been at Plant No. 83 since 1967, when the Air Force assumed ownership of the plant from the Atomic Energy Commission (AEC).

GE operations at Air Force Plant No. 83 involve the manufacturing of aircraft engine parts, sub-assemblies, and spare parts for military and commercial jet engines. Operations include machining, fiber laminate composition, investment casting, and shrouds and seals manufacturing.

Prior to 1967, there were three separate occupants in the area now occupied by GE. From 1948 to 1951, Fidal Manufacturing Company, a machine shop and heavy equipment builder was the first known occupant of the plant site. Buildings No. 5 and No. 11 were the only buildings on the site during that period. In 1951 the site was purchased by the AEC. From 1951 until about 1967, American Car and Foundry, Incorporated (ACF) served as the AEC contractor. Manufacturing operations included forming, welding, plating, and machining metal parts and structures, and molding and machining plastics. Just prior to the Air Force's purchase and GE's subsequent occupation of Plant 83, Dow Chemical Company joined with ACF in the operation of a portion of the facility for about 6 months. This was done for the purpose of training Dow on how to duplicate ACF's methods and skills so that the same products could be thereafter manufactured by Dow at the AEC's Rocky Flats Plant. Dow was not permitted during this time to institute any changes in the methods, materials, processes or practices being used.

ENVIRONMENTAL SETTING

The environmental setting data reviewed for this investigation indicate that the following elements are relevant to the evaluation of past hazardous waste management practices at Air Force Plant No. 83:

1. The normal annual precipitation is 7.77 inches; the net precipitation is -54.23 inches and the 1-year, 24-hour rainfall event is estimated to be 1.25 inches. These data indicate that there is little or no potential for precipitation to infiltrate the surface soils on the plant property. Also, there is a slight potential for runoff and erosion.
2. There is limited area on the plant property where natural soils are exposed. Most of the plant property is covered by asphalt or concrete. The natural soils on the property are typically clayey

or sandy loam with low permeability values. These data indicate that recharge by precipitation infiltrating the soils will be slow.

3. Surface water in the vicinity of the plant may recharge the shallow water-table aquifer or may flow downstream in the San Jose Drain to the Rio Grande River.
4. Clay is a dominant lithologic unit under the plant which may limit the vertical migration of ground water.
5. Alluvial deposits of sand, gravel, cobbles and clay underly the plant. Water levels are approximately 15 to 20 feet below ground within the shallow alluvial deposits.
6. Water levels within the deeper alluvial depostis and the Santa Fe group (undivided) are approximately 35-50 feet deep. These data indicate that a shallow water-table aquifer exists under the plant and a potential exists for the horizontal and vertical migration of ground water from the shallow water-table aquifer to the regional water-table aquifer.
7. Ground-water contamination has been detected in shallow monitoring wells on the plant property.
8. The direction of ground-water flow within the shallow water-table aquifer cannot be determined based on available data.
9. The regional ground-water flow direction is east and northeast from the plant to major water producing wells for the City of Albuquerque.
10. The operation of wells SJ3 and SJ6 may impact the ground-water conditions underlying the plant in both the shallow and regional water-table aquifers.
11. The plant is located in a "declared underground water basin" which is the sole source aquifer for Albuquerque's water supply.
12. There are no Federally- or state-listed endangered or threatened species which inhabit the plant property.

METHODOLOGY

During the course of this project, interviews were conducted with plant personnel (past and present) familiar with past waste disposal practices; file searches were performed for past hazardous waste activities; interviews were held with local, state and Federal agencies; and

a field tour was conducted at past hazardous waste activity sites. All suspected sites were investigated and five sites were identified as potentially containing hazardous contaminants resulting from past activities (Figure 1). These sites have been assessed using a Hazard Assessment Rating Methodology (HARM) which takes into account factors such as site characteristics, waste characteristics, potential for contaminant migration, and waste management practices. The details of the rating procedure are presented in Appendix E and the results of the assessment are given in Table 1. The rating system is designed to indicate the relative need for follow-on investigations.

FINDINGS AND CONCLUSIONS

The following conclusions have been developed based on the results of the project team's field inspection, review of base records and files, and interviews with base personnel. Each of the five sites listed below were ranked using the HARM system and were determined to have a sufficient potential for environmental contamination to warrant some degree of follow-on investigation.

North Parking Lot

Hazardous Waste Storage No. 1

Hazardous Waste Storage No. 3

Hazardous Waste Storage No. 4

Underground Cyanide Vault

RECOMMENDATIONS

A program for proceeding with Phase II of the IRP at Air Force Plant No. 83 is presented in Chapter 6. The Phase II recommendations are summarized as follows:

North Parking Lot - Soil Sampling, Install and Sample Monitoring Wells.

Hazardous Waste Storage No. 1 - Soil Sampling, Install and Sample Monitoring Wells.

Hazardous Waste Storage No. 3 - Soil Sampling, Install and Sample Monitoring Wells.

Hazardous Waste Storage No. 4 - Soil Sampling, Install and Sample Monitoring Wells.

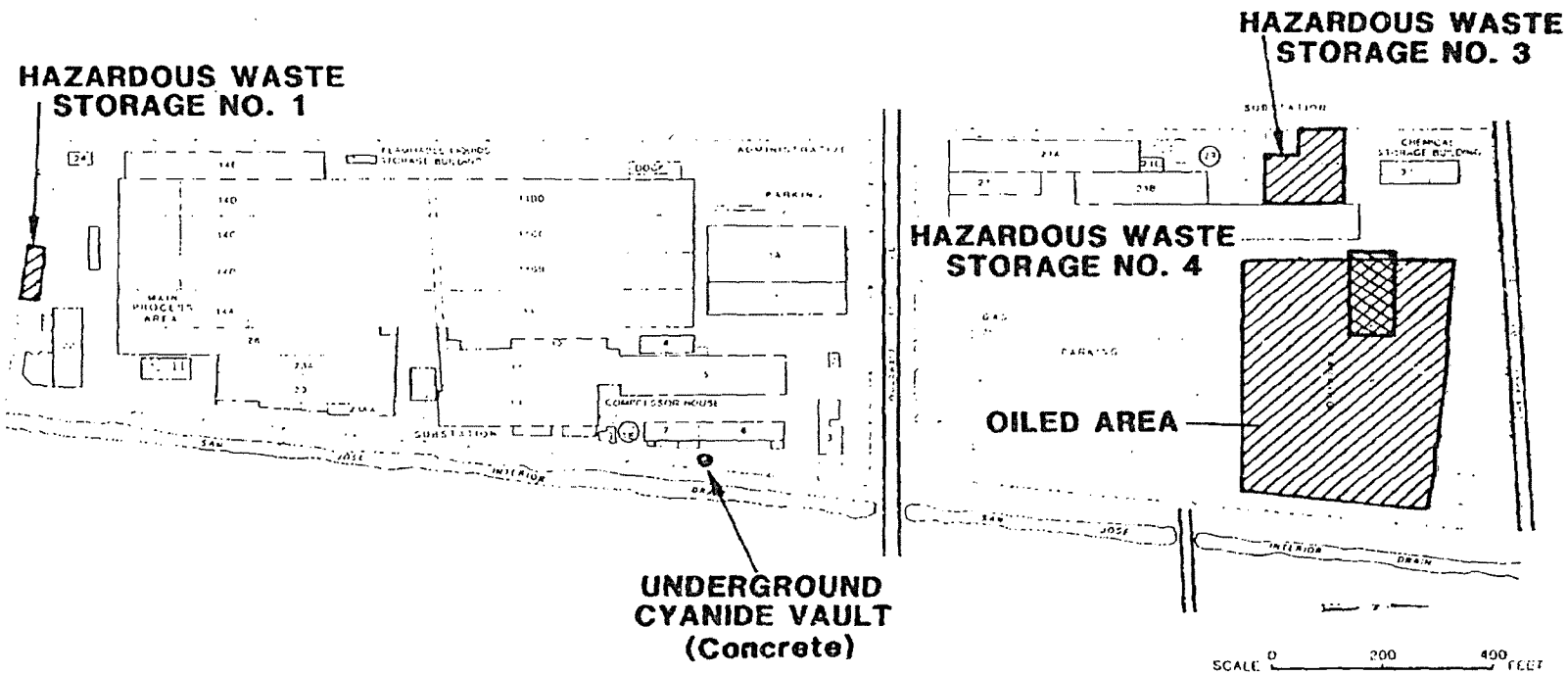
TABLE 1

SITES EVALUATED USING THE HAZARD ASSESSMENT
RATING METHODOLOGY
AIR FORCE PLANT NO. 83

Rank	Site	Operating Period	Final HARM Score
1	North Parking Lot	1979-1980	64
1	Hazardous Waste Storage No. 1	1954-Present	62
2	Hazardous Waste Storage No. 3	Late 1950's to Present	60
4	Hazardous Waste Storage No. 4	Mid 1970's-1981	54
5	Underground Cyanide Vault	Mid 1950's to Late 1970's	51

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

SITES OF POTENTIAL ENVIRONMENTAL CONTAMINATION



SOURCE: USAF PLANT NO. 83 DOCUMENTS

FIGURE 1

Underground Cyanide Vault	- Locate, investigate and analyze contents. If leakage has occurred, install and sample monitoring wells.

CHAPTER 1

INTRODUCTION

BACKGROUND

The United States Air Force, due to its primary mission of defense of the United States, has long been engaged in a wide variety of operations dealing with toxic and hazardous materials. Federal, state, and local governments have developed strict regulations to require that disposers identify the locations and contents of past disposal sites and take action to eliminate hazards in an environmentally responsible manner. The primary Federal legislation governing disposal of hazardous waste is the Resource Conservation and Recovery Act (RCRA) of 1976, as amended. Under Section 6003 of the Act, Federal agencies are directed to assist the Environmental Protection Agency (EPA) and under Section 3012, state agencies are required to inventory past disposal sites and make the information available to the requesting agencies. To assure compliance with these hazardous waste regulations, the Department of Defense (DOD) developed the Installation Restoration Program (IRP). The current DOD IRP policy is contained in Defense Environmental Quality Program Policy Memorandum (DEQPPM) 81-5, dated 11 December 1981 and implemented by Air Force message dated 21 January 1982. DEQPPM 81-5 reissued and amplified all previous directives and memoranda on the Installation Restoration Program. DOD policy is to identify and fully evaluate suspected problems associated with past hazardous contamination, and to control hazards to health and welfare that resulted from these past operations. The IRP will be the basis for response actions on Air Force installations under the provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, and clarified by Executive Order 12316. CERCLA is the primary federal legislation governing remedial actions at past hazardous waste disposal sites.

PURPOSE AND SCOPE OF THE ASSESSMENT

The Installation Restoration Program has been developed as a four-phased program as follows:

Phase I - Initial Assessment/Records Search
Phase II - Confirmation and Quantification
Phase III - Technology Base Development
Phase IV - Operations/Remedial Actions

Engineering-Science (ES) was retained by the United States Air Force to conduct the Phase I Records Search at Air Force Plant No. 83 under Contract No. F08637-80-G0009-5009. This report contains a summary and an evaluation of the information collected during Phase I of the IRP and recommendations for follow-on actions.

The goal of the first phase of the program was to identify the potential for environmental contamination from past waste disposal practices at Air Force Plant No. 83, and to assess the potential for contaminant migration. The activities that were performed in the Phase I study included the following:

- Review of site records
- Interview of personnel familiar with past generation and disposal activities
- Surveys of types and quantities of wastes generated
- Determination of estimated quantities and locations of current and past hazardous waste treatment, storage, and disposal
- Definition of the environmental setting at the plant
- Review of past disposal practices and methods
- Field tour of plant facilities
- Collection of pertinent information from Federal, state, and local agencies
- Assessment of potential for contaminant migration
- Development of follow-on recommendations.

ES performed the on-site portion of the records search during October 1983. The following team of professionals were involved:

- R. E. Mayfield, Environmental Engineer and Project Manager, MSCE, 6 years of professional experience
- M. I. Spiegel, Environmental Scientist, BS Environmental Science, 6 years professional experience
- H. D. Harman, PG, Hydrogeologist, BS Geology, 8 years professional experience.

More detailed information on these three individuals is presented in Appendix A.

METHODOLOGY

The methodology utilized in the Air Force Plant No. 83 Records Search began with a review of past and present industrial operations conducted at the plant. Information was obtained from available records and files, as well as interviews with past and present plant employees from the various operating areas. Those interviewed included current and past personnel associated with ACF, Dow and General Electric Company. A listing of the plant interviewee positions and approximate years of service is presented in Appendix B.

Concurrent with the plant interviews, the applicable Federal, state, and local agencies were contacted for pertinent plant-related environmental data. The agencies contacted and interviewed are listed below and additional information is included in Appendix B.

- o U.S. Department of Energy (DOE)
- o U.S. Environmental Protection Agency (EPA), Region VI
- o U.S. Geological Survey (USGS), Water Resources Division
- o U.S. Department of Defense DOD, Defense Logistics Agency
- o U.S. Army Corps of Engineers
- o Middle Rio Grande Conservancy District
- o New Mexico State Engineers Office
- o New Mexico Health and Environment Department (NMHED)
- o City of Albuquerque, Water Resources Department
- o City of Albuquerque, Water Systems Division

The next step in the activity review was to identify all sources of hazardous waste generation and to determine the past management practices regarding the use, storage, treatment, and disposal of hazardous materials from the various operations at the plant. Included in this part of the activities review was the identification of any past disposal sites and other possible sources of contamination such as spill areas.

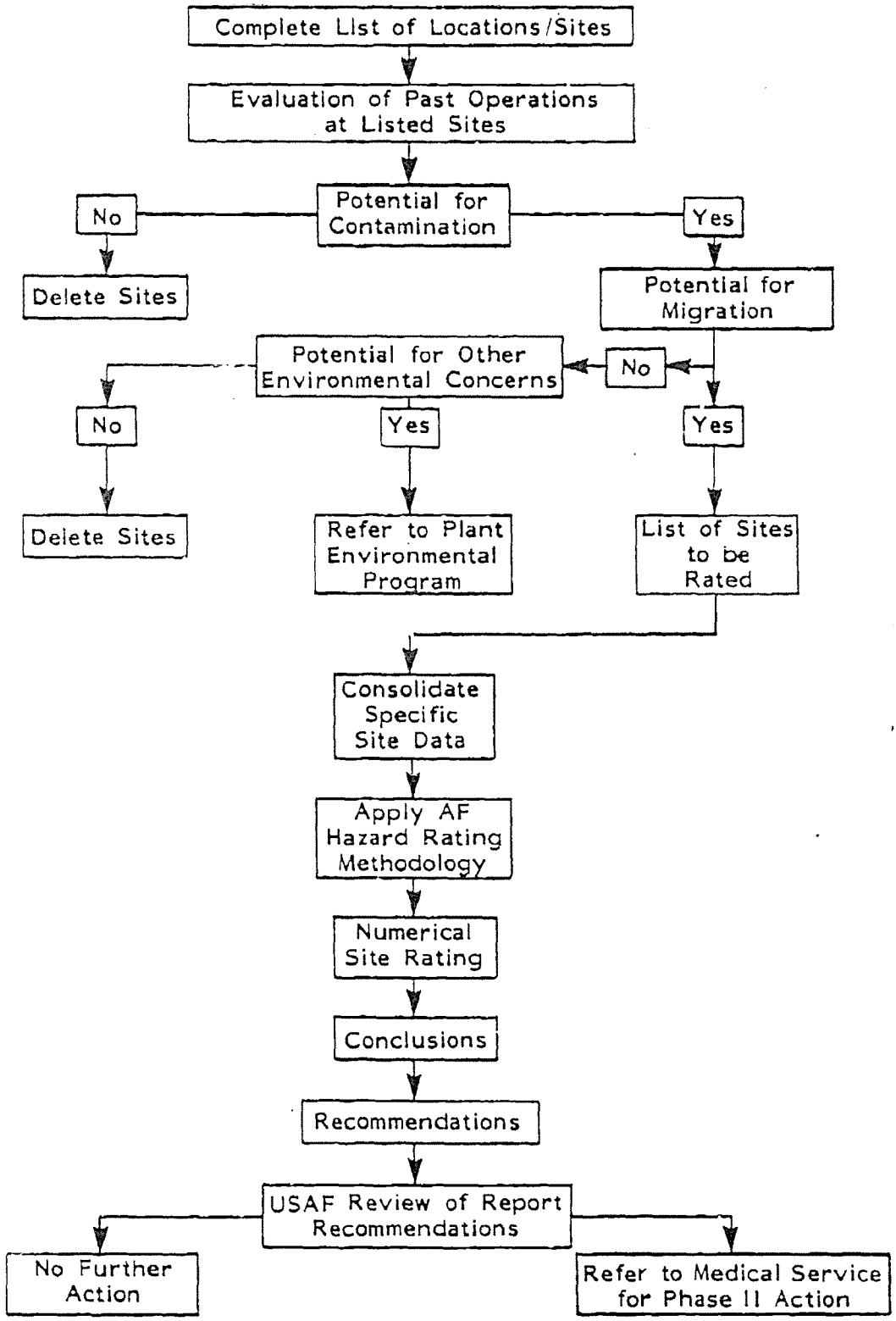
A general ground tour of the identified sites was then made by the ES Project Team to gather site-specific information including: (1) visual evidence of environmental stress; (2) the presence of nearby drainage ditches or surface water bodies; (3) visual inspection of these water bodies for any obvious signs of contamination; and (4) past waste management site conditions.

A decision was then made, based on all of the above information, whether a potential existed for hazardous material contamination at any of the identified sites using the Decision Tree shown in Figure 1.1. If no potential existed, the site was deleted from further consideration. For those sites where a potential for contamination was identified, a determination of the potential for migration of the contamination was made by considering site-specific conditions. If no potential for contaminant migration exists but other environmental concerns were identified, the site was referred to the plant environmental protection program. If there were no further environmental concerns identified, then the site was deleted. If the potential for contaminant migration was considered significant, then the site was evaluated and prioritized using the Hazard Assessment Rating Methodology (HARM). A discussion of the HARM system is presented in Appendix E. The sites that were evaluated using the HARM procedures were also reviewed with regard to future land use restrictions.

FIGURE 1.1

PHASE I INSTALLATION RESTORATION PROGRAM

DECISION TREE



CHAPTER 2

INSTALLATION DESCRIPTION

LOCATION, SIZE AND BOUNDARIES

Air Force Plant No. 83, otherwise known as General Electric Aircraft Engine Business Group's Albuquerque Plant, is located in the southern portion of Albuquerque, New Mexico (Figure 2.1). The plant site is approximately one mile due west of Kirtland Air Force Base (Figure 2.2). The facility is comprised of approximately 30 major buildings which cover 586,970 square feet within a 33-acre area (Figure 2.3).

Surrounding land uses include residential to the north, heavy and light industrial to the west (including the Eidal Manufacturing Plant, which manufactures tractors; a vacant manufacturing plant; and a construction equipment storage yard), light industrial to the south (including a packing plant and an auto salvage yard), and light and heavy industrial and residential to the east (including Texaco's oil storage facility; a deep freeze locker storage facility; Conoco's storage facility; a vacant lot, and a small residential area). The area within one-fourth mile of the plant is populated by less than 1,000 people.

HISTORY

General Electric Company (GE) operates industrial facilities at Air Force Plant No. 83. GE has been at Plant No. 83 since 1967 when the Air Force assumed ownership of the plant form the Atomic Energy Commission (AEC).

GE operations at Air Force Plant No. 83 involve the manufacturing of aircraft engine parts, sub-assemblies, and spare parts for military and commercial jet engines. Operations include machining, fiber laminate composition, investment casting, and shrouds and seals manufacturing.

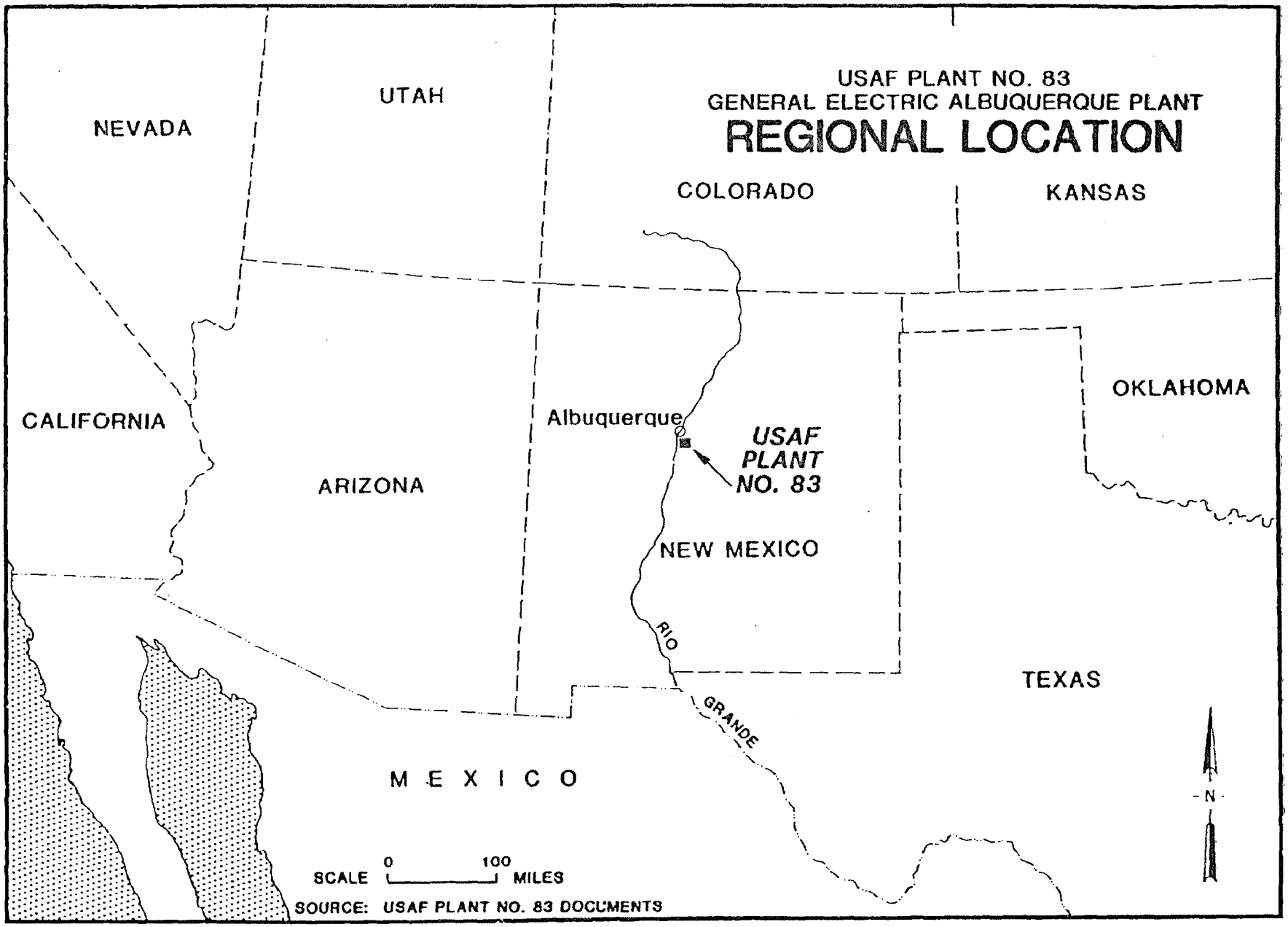
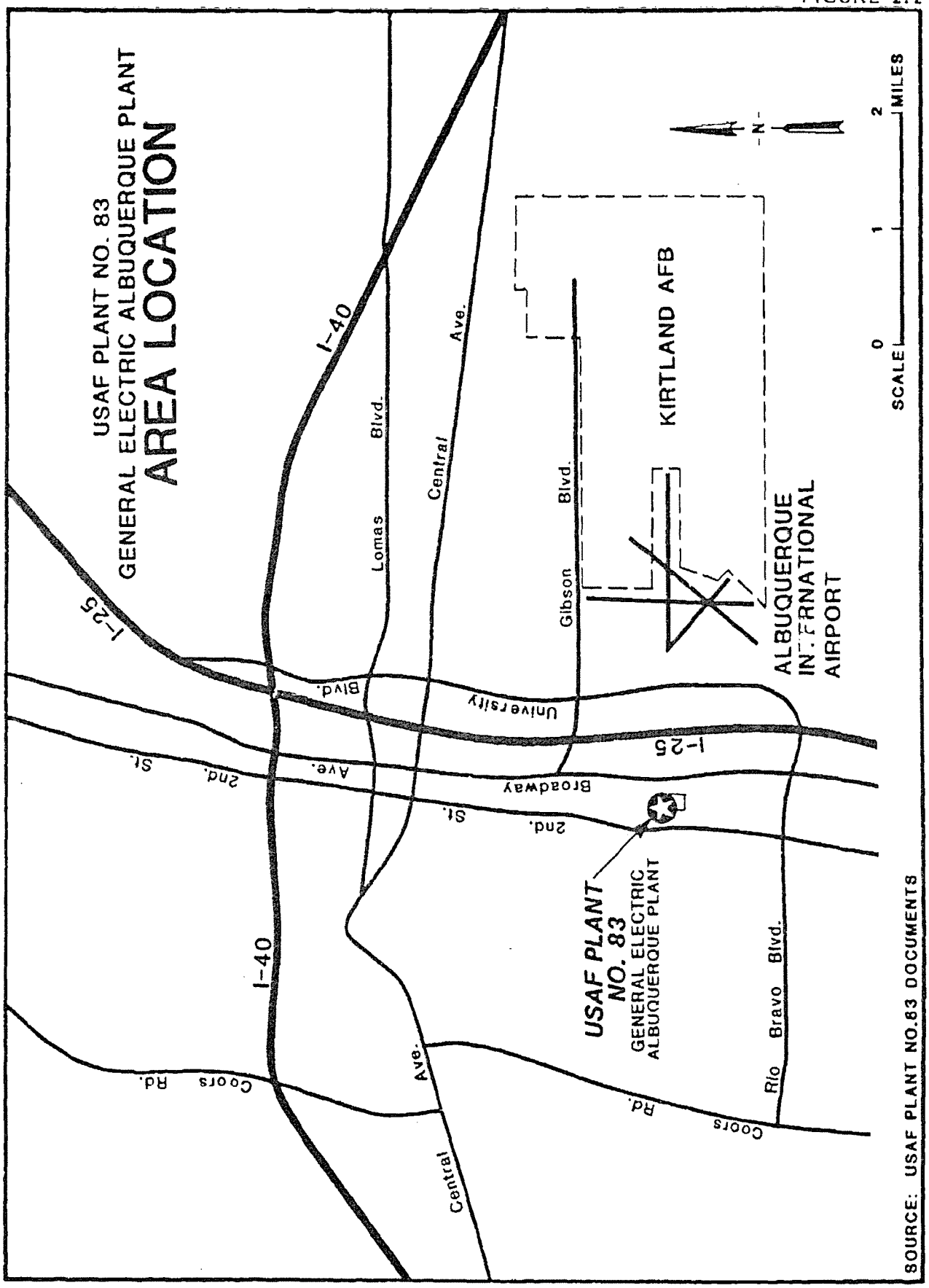


FIGURE 2.1

ES ENGINEERING-SCIENCE

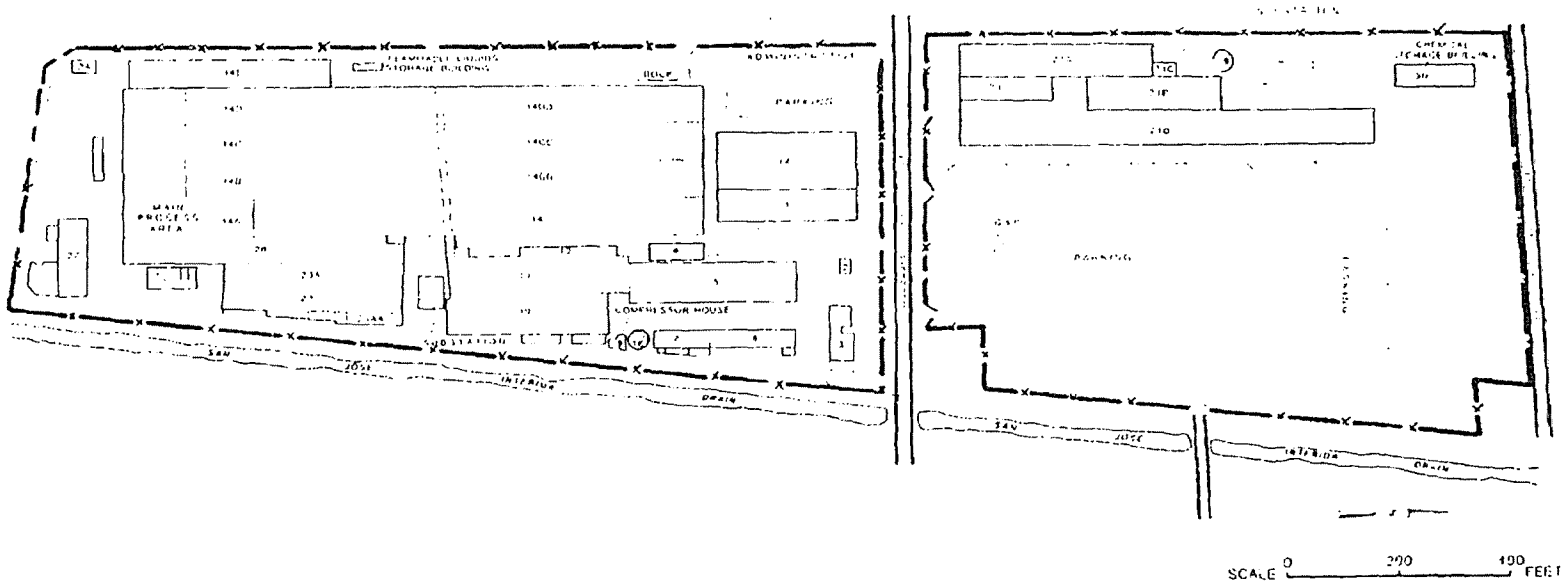
FIGURE 2.2



SOURCE: USAF PLANT NO.83 DOCUMENTS

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

SITE PLAN



SOURCE: USAF PLANT NO. 83 DOCUMENTS

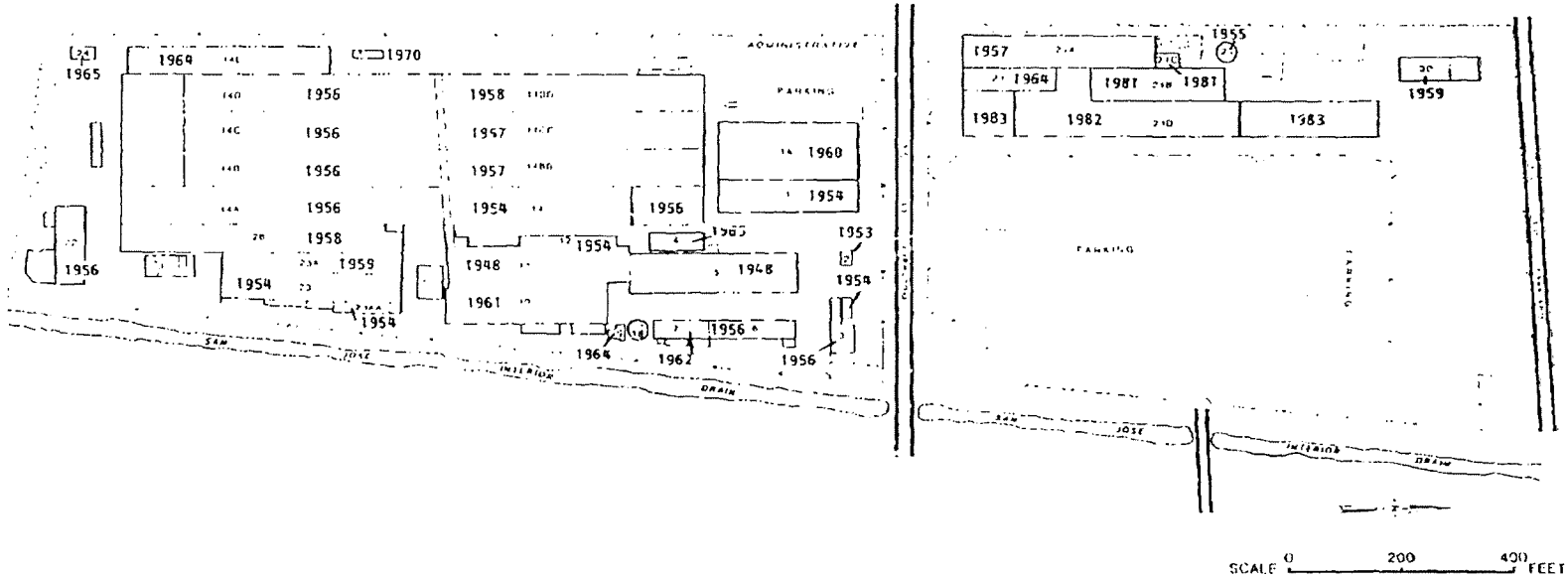
FIGURE 2.3

Prior to 1967, there were three separate occupants in the area now occupied by GE. From the late 1948 to 1951, Eidal Manufacturing Company, a machine shop and heavy equipment builder, was the first occupant of the plant site. Buildings No. 5 and No. 11 were the only buildings on the site during that period. In 1951, the site was purchased by the AEC. From 1951 until about 1967, American Car and Foundry (ACF), Incorporated, served as the AEC contractor. Manufacturing operations included forming, welding, plating, and machining metal parts and structures, and molding and machining plastics. Just prior to the Air Force's purchse and GE's subsequent occupation of Plant 83, the Dow Chemical Company joined with ACF in the operation of a portion of the facility for about 6 months. This was done for the purpose of training Dow on how to duplicate ACF's methods and skills so that the same products could be thereafter manufactured by Dow at the AEC's Rocky Flats Plant. Dow was not permitted during this time to institute any changes in the methods, materials, processes or practices being used.

A chronology of the facility construction is depicted on Figure 2.4.

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

CHRONOLOGY OF FACILITY CONSTRUCTION



SOURCE: USAF PLANT NO. 83 DOCUMENTS

FIGURE 2.4

CHAPTER 3

ENVIRONMENTAL SETTING

The environmental setting of USAF Plant No. 83 is described in this chapter with an emphasis on the identification of natural features that may promote the movement of hazardous waste contaminants. Environmental conditions pertinent to this study are summarized at the conclusion of this chapter.

METEOROLOGY

The climate of Albuquerque is characterized by a large number of sunny days and low humidity. Temperature extremes may vary from a high of 100°F on summer days to a low of 15°F on winter nights. This "Arid Continental" type of climate is usually dry with brief but heavy thundershowers occurring from July to September. Very little rainfall occurs during the winter months (National Oceanic and Atmospheric Administration (NOAA), 1983). Selected meteorological data for Albuquerque are summarized in Table 3.1.

Two climatic features of interest in determining the potential for movement of contaminants are net precipitation and rainfall intensity. Net precipitation is an indicator of the potential for leachate generation and is equal to the difference between precipitation and evaporation. Rainfall intensity is an indicator of the potential for excessive runoff and erosion. The one-year, 24-hour rainfall event is used to gauge the potential for runoff and erosion. Net precipitation at Plant No. 83 is minus (-) 54.23 inches as determined from meteorological records. Normal annual precipitation at the Albuquerque International Airport for the period 1941-1970 is 7.77 inches (NOAA, 1983) and the mean annual lake evaporation for the area is 62 inches (NOAA, 1979). The negative value of net precipitation indicates that there is little or no potential for precipitation to infiltrate the surface soils on the plant property. The presence of asphalt and concrete covering a

TABLE 3.1

CLIMATIC CONDITIONS FOR USAF PLANT NO. 83

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
TEMPERATURE (°F)												
Normal	35.2	40.0	45.8	55.8	65.3	74.6	78.7	76.6	70.1	58.2	44.5	36.2
PRECIPITATION (Inches)												
Normal	0.30	0.39	0.47	0.48	0.53	0.50	1.39	1.34	0.77	0.79	0.29	0.52
Maximum Monthly	1.32	1.42	2.18	1.97	3.07	1.71	3.33	3.30	1.99	3.08	1.45	1.85
SNOWFALL (Inches)												
Maximum Monthly	9.5	8.2	13.9	8.1	1.0	0.0	0.0	0.0	T	0.9	9.3	14.7

Note: T = Trace
Period of Record: 1941-1970
Source: NOAA, 1983

majority of the plant property further reduces infiltration. The one-year, 24-hour rainfall event in the area of the plant is estimated to be 1.25 inches (NOAA, 1963). This value indicates that there is a slight potential for runoff and erosion. Although the one-year, 24-hour rainfall event is small, the presence of asphalt and concrete covering a majority of the plant property increases the potential for runoff and erosion.

GEOGRAPHY

Plant No. 83 is located in the Basin and Range Physiographic Province (Figure 3.1). Within the Basin and Range Province it is located in the northern portion of the Mexican Highland Section (Wells, et al., 1981). The plant is further located in the Rio Grande Valley between the West Mesa and East Mesa (Figure 3.2). The Rio Grande is the major river flowing south through the valley.

Topography

The topography of the general area in which the plant is located is quite spectacular with three major topographic features. These features are the Sandia Mountains, the East and West Mesas and the Rio Grande Valley. The Sandia Mountains, rising to a crest of 10,682 feet above the National Geodetic Vertical Datum of 1929 (NGVD), are the most spectacular features of the area. From the foothills of the mountains the land surface gradually decends to the East Mesa with an average elevation of 5,000 feet NGVD. The West Mesa, across the Rio Grande, and the East Mesa comprise another major topographic feature of the plant area. The third major topographic feature of the area is the Rio Grande Valley. The valley is approximately four miles wide near the plant. The plant is located approximately 0.7 miles east of the Rio Grande in what is called the South Valley of Albuquerque. The land surface of the plant itself is relatively flat with an average elevation of 4,940 feet NGVD. The immediate area surrounding the plant is developed for industrial uses.

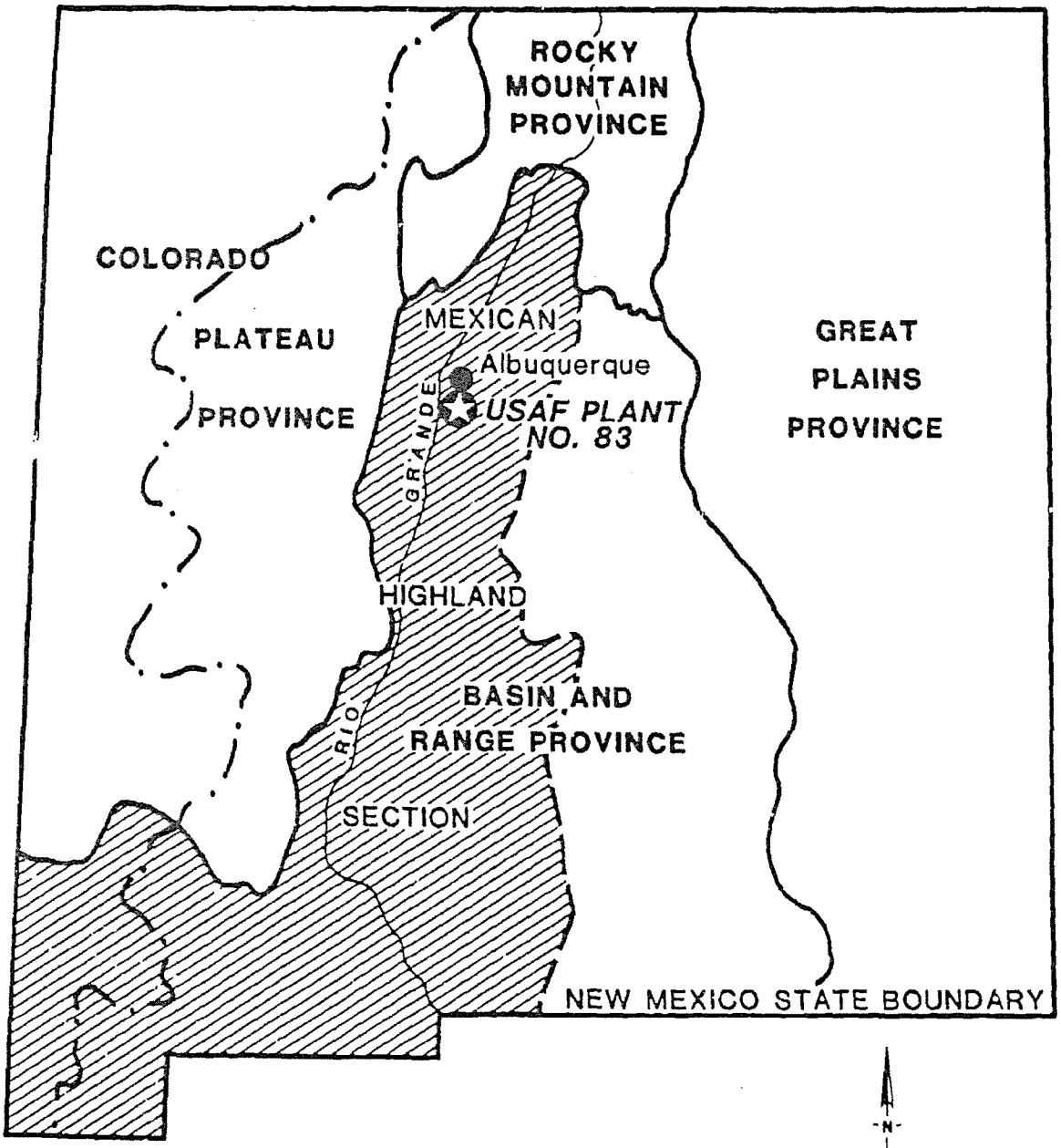
Soils

The natural exposed surface soils of Plant No. 83 are limited in area. Only areas near the administration buildings (1A, 1 and 3) and

FIGURE 3.1

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

REGIONAL PHYSIOGRAPHIC FEATURES



LEGEND

- CONTINENTAL DIVIDE
- PROVINCE BOUNDARY
- SECTION LIMITS

SOURCE: WELLS, LAMBERT AND CALLENDER, 1981

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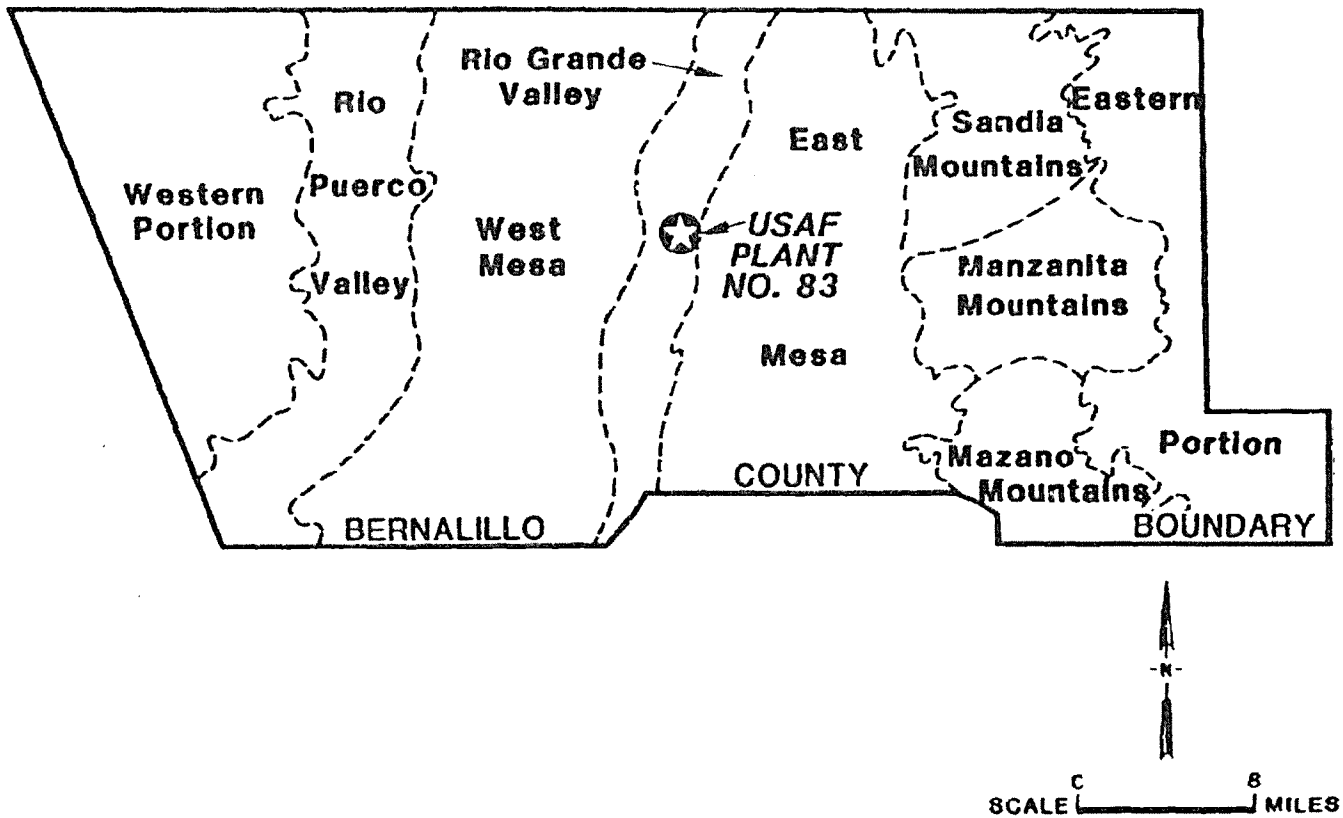
USAF PLANT NO. 83

GENERAL ELECTRIC ALBUQUERQUE PLANT

LOCAL PHYSIOGRAPHIC FEATURES



SOURCE: USDA, SCS, 1977

FIGURE 3.2

ES ENGINEERING-SCIENCE

the extreme northern portion of the plant have exposed soils; all other areas are covered by asphalt or concrete. The natural soils are characterized by clayey and sandy loam. Loam is a soil with varying proportions of clay, sand and organic matter. The soils are mapped on Figure 3.3 and their descriptions and engineering properties are summarized on Table 3.2. The soil property of concern in assessing the potential for surface-water infiltration is permeability. The permeability values for the type soils in the area of the plant range from 0.00042 centimeters per second (cm/sec) to 0.0014 cm/sec (Hacker, 1977). The actual values at the plant may vary from these type soil values due to increased percentages of localized sand underlying the plant. The values indicate that surface water will move relatively slowly through the surface soils of the plant. The Soil Conservation Service (SCS) has ranked the type soils underlying the plant as having severe use limitations for septic tank absorption fields. The SCS has noted wetness and slow percolation as reasons for the severe use limitations.

SURFACE-WATER RESOURCES

USAF Plant No. 83 is located in the Rio Grande Drainage Basin. In the Albuquerque area a system of ditches, drains and canals in the valley regulates the directions and flow rates of surface water to and from the Rio Grande. The system, maintained by the Middle Rio Grande Conservancy District, was constructed to alleviate problems related to drainage, flood control and irrigation of crop land in the Rio Grande Valley (Shah, 1983). Levees and riverside drains protect areas in the valley from floods.

Drainage

Drainage from Plant No. 83 is controlled by twelve discharge outfall points from the plant property to the San Jose Drain which borders the plant on its eastern side. Fourteen previously open discharge outfall points were plugged in 1978. The outfalls are connected to above-ground and underground drain lines which control the storm drainage and permitted discharges from the plant. Figure 3.4 shows the surface drainage map for the plant. The San Jose Drain flows south through a fully concreted ditch north of Woodward Road and an unlined ditch south of Woodward Road. The unlined portion supports

TABLE 3.2

SOILS DATA FOR USAF PLANT NO. 83 AND VICINITY

Symbol on Figure 3.3	Unit Description	Depth Below Ground (inches)	[1] Permeability (centimeters/second)	Septic Tank Absorption Field Use Limitations
Gd	Gila loam, moderately alkali	0-60	4.2×10^{-4} to 1.4×10^{-3}	[2] Severe: wet
Gk	Glendale loam	0-60	1.4×10^{-4} to 4.2×10^{-4}	Severe: percolation slow
Gm	Glendale clay loam	0-60	1.4×10^{-4} to 4.2×10^{-4}	Severe: percolation slow

Note:

[1] Actual values at plant may vary from reported vicinity values due to increased percentage of localized sand underlying the plant.

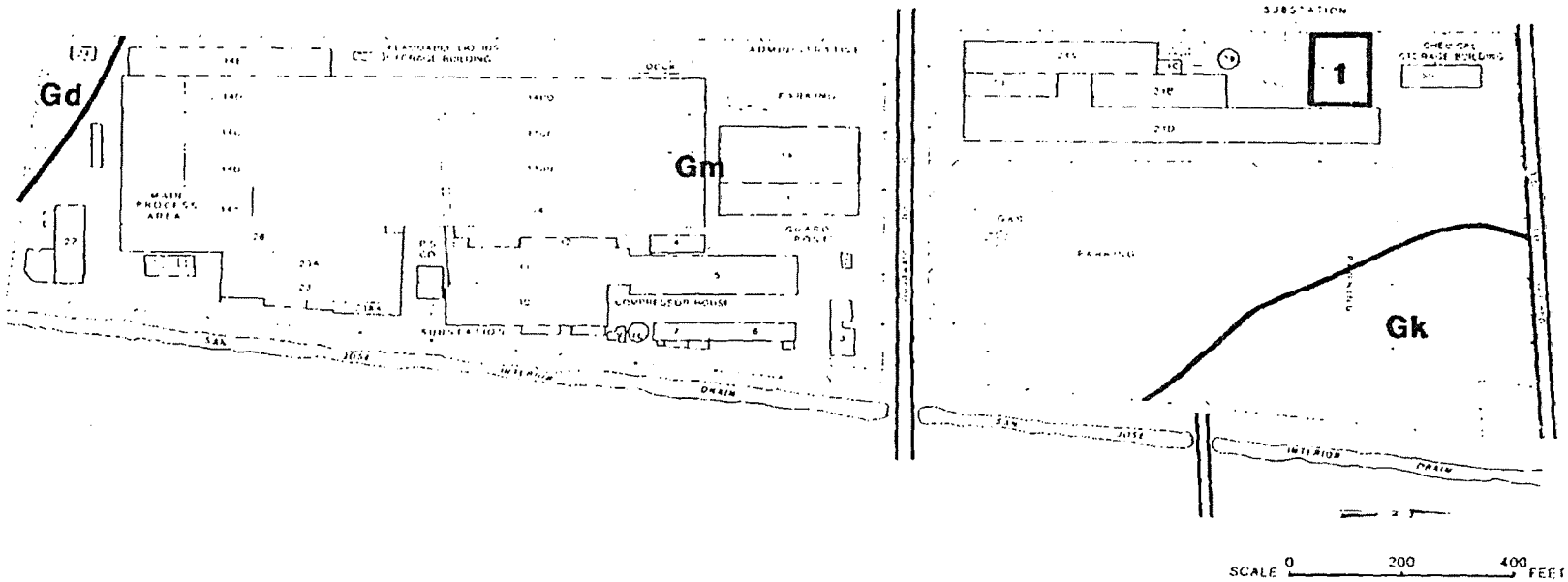
[2] Severe soil limitation indicates that soil properties are so unfavorable and so difficult to correct or overcome that major soil reclamation, special design, or intensive maintenance are required.

Source: Hacker, 1977

USAF PLANT NO. 83

GENERAL ELECTRIC ALBUQUERQUE PLANT

SOILS MAP



LEGEND

Gd GILA LOAM, MODERATELY ALKALI

Gk GLENDALE LOAM

Gm GLENDALE CLAY LOAM

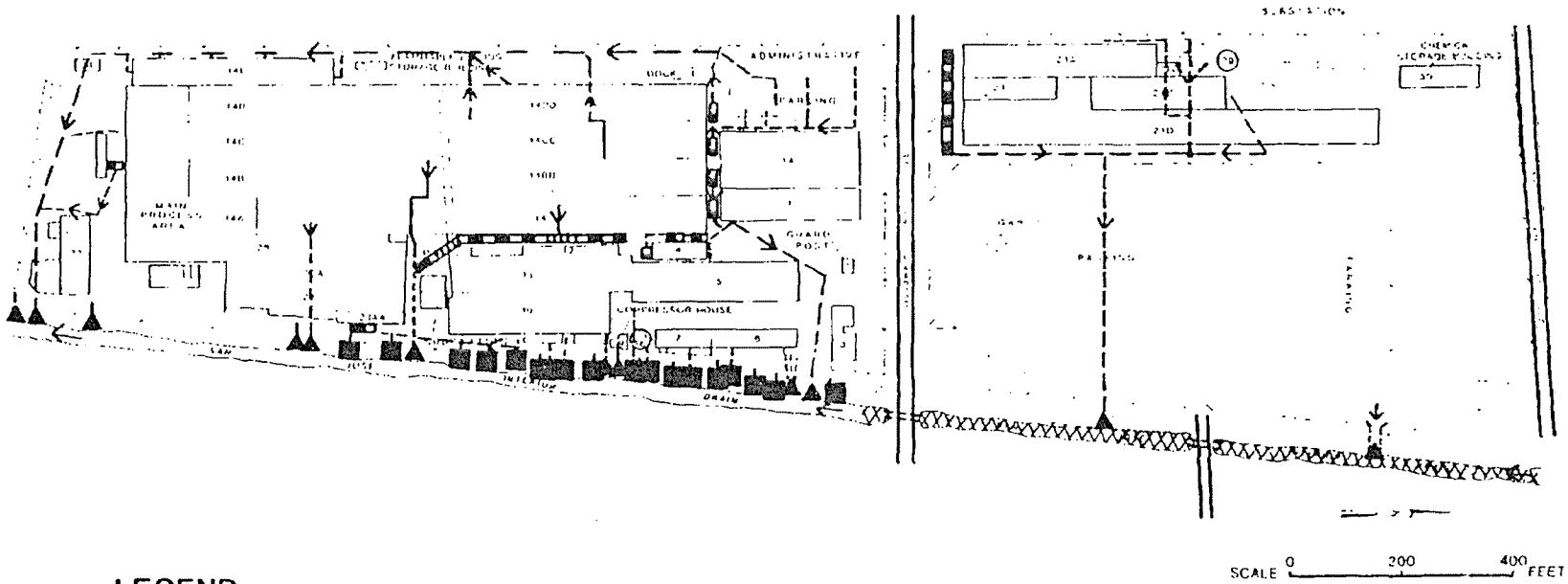
SOURCE: USDA, SCS, 1977

NOTE:
1. SANDY F' L WAS OBSERVED DURING SITE VISIT (OCTOBER 1983)

FIGURE 3.3

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

SURFACE DRAINAGE MAP



LEGEND

- ABOVE SURFACE DRAIN LINE
- UNDERGROUND DRAIN LINE
- SURFACE TRENCH (STEEL PLATE COVER)
- SURFACE TRENCH (GRATING COVER)
- DRAIN OUTFALL
- DRAIN OUTFALL (CLOSED) (Closed in 1978)
- DIRECTION OF DRAINAGE FLOW
- CONCRETE LINED

NOTE: SEE FIGURE 3.6 FOR OPEN DRAIN OUTFALL NUMBERS

SOURCE: USAF PLANT NO. 83 DOCUMENTS

FIGURE 3.4

abundant vegetation. Upstream of the plant the San Jose Drain controls water flow from the San Jose Drain storm sewer catchment basin. Water in the San Jose Drain moves rapidly in the drain section south of discharge outfall numbers 004 and 005, but moves relatively slowly in the drain section north of these outfalls. Discharges from outfalls 004 and 005 near Building 10 increase the water flow south of Building 10. Within the slow moving section of the drain surface water may infiltrate to the shallow water-table aquifer. Recharge from area drainage ditches to the shallow water-table aquifer has been reported by Bjorklund and Maxwell, 1961. During the 1920's and 1930's, prior to the construction of the ditches in the area, ground water recharged the natural surface streams. The ditches were installed to lower the high ground-water levels and reduce marshy and wet areas. The San Jose Drain was installed in 1934 (Shah, 1983).

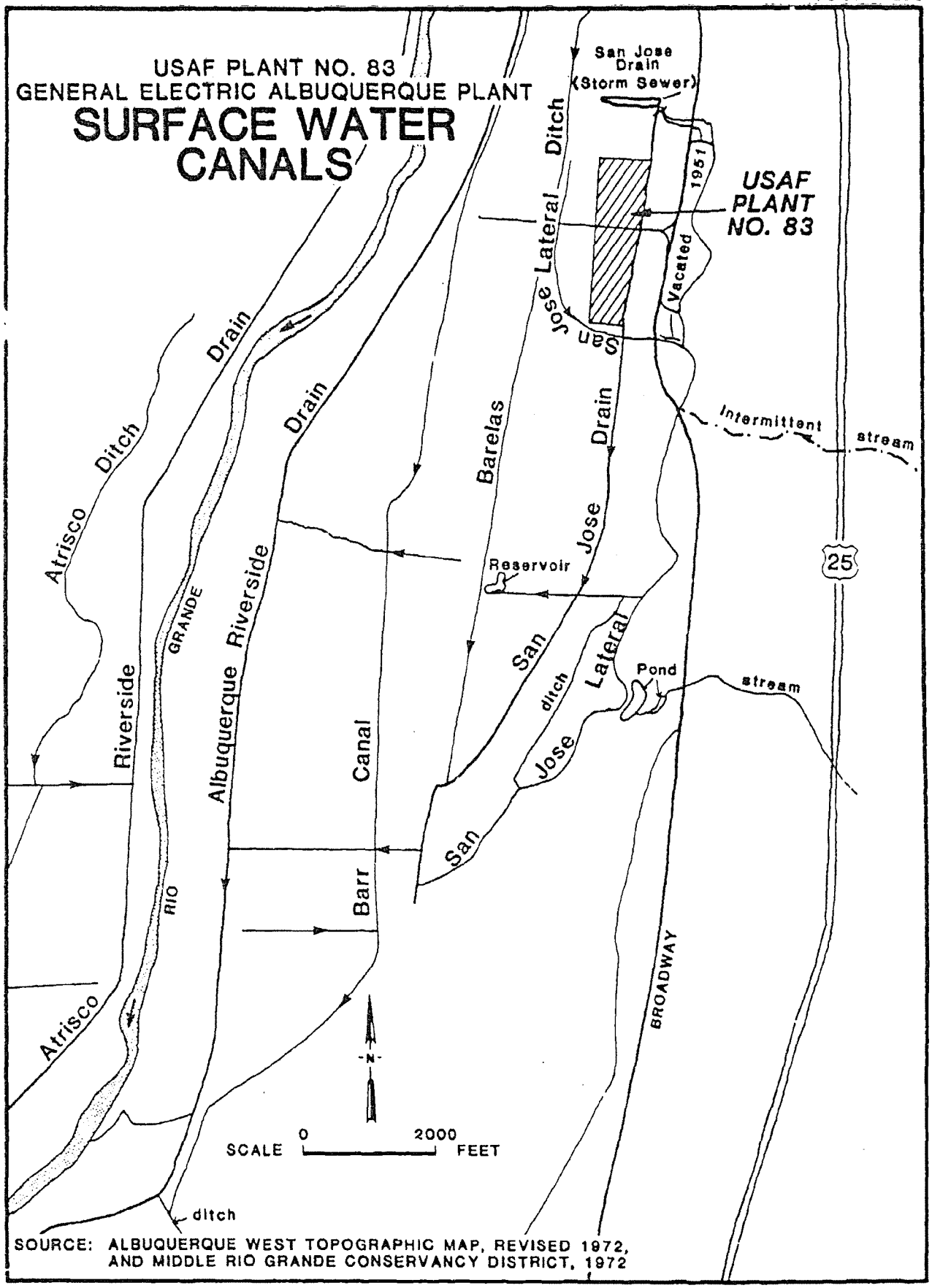
Water moving rapidly from the plant along the San Jose Drain flows south and southwest toward the Rio Grande. Figure 3.5 shows the surface-water drainage system south of the plant. Along its approximately four mile route from the plant to the Rio Grande, water from the Barelas Ditch, Barr Canal and Albuquerque Riverside Drain joins water in the San Jose Drain. Water is pumped from the San Jose Drain and other canals and ditches near the Rio Grande for irrigation purposes.

Surface-Water Quality

The general surface-water quality of the Rio Grande and local canals and drains in the Albuquerque area has been described as good, with suspended sediment the only problem (Bjorklund and Maxwell, 1961). Within Bernalillo County surface-water quality problems have been reported by Jercinovic, 1982 and McQuillian, et al., 1982. These problems were petroleum-product contamination and nitrate contamination within canals and drainage ditches.

In the immediate vicinity of the plant the New Mexico Environmental Improvement Division (NMEID) obtained two grab water samples from the San Jose Drain downstream from the plant (McQuillian, et al., 1982). The location is shown on Figure 3.6. Trace amounts of three organic contaminants were found. These contaminants were trichloromethane, 1,2-dichloroethane and 1,1,1-trichloroethane (Table 3.3). The highest concentration of 1,2-dichloroethane was 0.002 mg/l which is well below

FIGURE 3.5



SOURCE: ALBUQUERQUE WEST TOPOGRAPHIC MAP, REVISED 1972, AND MIDDLE RIO GRANDE CONSERVANCY DISTRICT, 1972

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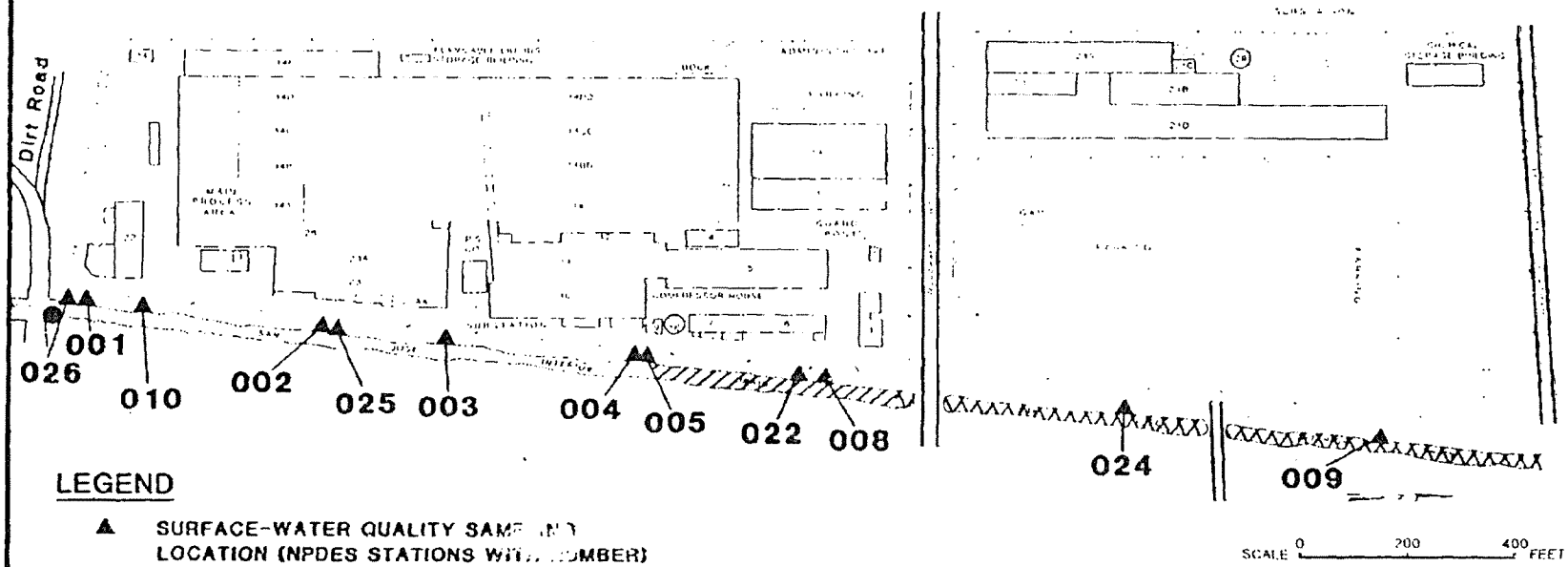
USAF PLANT NO. 83

GENERAL ELECTRIC ALBUQUERQUE PLANT

SURFACE-WATER QUALITY SAMPLING LOCATIONS



LEGEND

- ▲ SURFACE-WATER QUALITY SAMPLING LOCATION (NPDES STATIONS WITH NUMBER)
- ● SURFACE-WATER QUALITY SAMPLING LOCATION (NMEID)
- CONCRETE LINED
- STREAM SEGMENT OF LOW WATER FLOW

SOURCE: USAF PLANT NO. 83 DOCUMENTS

NOTE: SEE TABLE 3.3 FOR WATER-QUALITY DATA

FIGURE 3.6

the NMWQCC Human Health Standard of 0.02 mg/l. There are no standards for trichloromethane or 1,1,1-trichloroethane. The source of these three organic contaminants has not been identified. No sampling of the San Jose Drain upstream of the plant was conducted at the time of the downstream sampling.

Water quality sampling of the twelve water discharge outfall points into the San Jose Drain are conducted by the plant (Figure 3.6). These twelve discharge points are sampled according to the National Pollutant Discharge Elimination System (NPDES). The results of recent sampling are shown in Table 3.3. The allowable discharge limits for oil and grease has been exceeded on six occasions while the allowable discharge for chemical oxygen demand has been exceeded on five occasions. The stations at which these excesses were detected were station numbers 001, 002, 003, 008 and 010. The station at which the most excess occurred was station number 003 on August 1, 1983.

Surface-Water Use

The surface water of the Albuquerque area is used mainly for irrigation purposes. The Middle Rio Grande Conservancy District maintains the ditches, canals and drains for irrigation uses as well as for drainage and flood control. Water flow control gates are controlled by the District to allow farmers to use their allocated amounts of water. Other uses of surface water include limited warm water fishery, livestock and wildlife watering and secondary contact recreation.

The plant discharges its storm water and NPDES permitted waters into the San Jose Drain. Municipal type waste water is discharged into the Albuquerque sewage system. The waste water treatment facility is located approximately one mile northwest of the plant on the Rio Grande. No problems have been noticed by Albuquerque from the plant's discharge into the city waste water treatment facility (Holley, 1983).

GROUND-WATER RESOURCES

The ground-water resources of the Albuquerque area are generally abundant and are of good quality except in deposits less than 100 feet deep. Reports by Bjorklund and Maxwell (1961), Reeder, et al. (1967), New Mexico State Engineer (1974), Albuquerque District, U.S. Army Corps of Engineers (1979), McQuillan, et al. (1982), McQuillan (1982) and

TABLE 3.3
SURFACE-WATER QUALITY DATA
USAF PLANT NO. 83

(Parameter analyses are presented in milligrams per liter)

Station Identification	Date (mn-dy-yr)	pH (su) (6.0-9.0)[1]	Oil and Grease (15)[1]	COD (100)[1]	TOC (Sparged) (50)[1]	Trichoromethane	1,2-Dichloroethane (0.02)[2]	1,1,1-Trichloro-ethane	Benzene (0.01)[2]
San Jose Drain (RMEID)	9/15/82	NA	NA	NA	NA	0.002	0.002	0.007	ND
San Jose Drain (RMEID)	9/21/82	NA	NA	NA	NA	ND	ND	0.001	ND
001 (NPDES)	9/1/82[3]	8.0	ND	ND	NA				
	1/1/83	8.3	7	125 *	NA				
	2/1/83	8.0	ND	39	NA				
	3/1/83	7.8	ND	25	NA				
	5/1/83	8.1	82 *	334 *	NA				
	6/1/83	7.8	ND	ND	NA				
	7/1/83	7.7	ND	ND	NA				
	8/1/83	7.1	2	ND	NA		(Not analyzed in NPDES sampling)		
002	5/1/83	7.1	70 *	197 *	NA				
003	9/1/82	8.4	ND	ND	NA				
	1/1/83	8.2	1	30	NA				
	2/1/83	7.9	ND	39	NA				
	3/1/83	8.2	28 *	ND	NA				
	5/1/83	8.7	ND	26	NA				
	6/1/83	8.5	ND	ND	NA				
	7/1/83	8.1	ND	25	NA				
	8/1/83	7.2	560 *	1330 *	NA				
004	9/1/82	7.6	ND	ND	NA				
	1/1/83	7.8	ND	NA	2				
	2/1/83	7.8	ND	NA	4				
	5/1/83	7.9	ND	NA	1				
	6/1/83	7.7	ND	NA	4				
	7/1/83	7.6	ND	NA	ND				
	8/1/83	7.3	ND	NA	ND				
005	9/1/82	7.6	ND	ND	NA				
	1/1/83	7.8	ND	NA	2				

Notes: 1. NPDES maximum permit requirements
2. New Mexico Water Quality Control Commission Regulations, Human Health Standards for Ground Water (no standards for other organics listed). Standards listed are for present and potential future use of ground water as domestic and agricultural water supply.
3. Period lasting through month indicated; maximum values reported.

See Figure 3.6 for station locations

ND = None detected Sparged: A chemical analysis procedure in which an air diffuser is used to create large bubbles.
NA = Not analyzed
mn-dy-yr = month-day-year *Analyses in which standards have been exceeded.
su = standard units

Source: USAF Plant No. 83 documents and McQuillan, et al., 1982.

TABLE 3.3 (Continued)

SURFACE-WATER QUALITY DATA
USAF PLANT NO. 83

(Parameter analyses are presented in milligrams per liter)

Station Identification	Date (mn-dy-yr)	pH (su) (6.0-9.0)[1]	Oil and Grease (15)[1]	COD (100)[1]	TOC (Sparged) (50)[1]	Trichloroethane	1,2-Dichloroethane (0.02)[2]	1,1,1-Trichloro-ethane	Benzene (0.01)[2]
005 (continued)	2/1/83	7.8	2	NA	2				
	5/1/83	7.9	ND	NA	1				
	6/1/83	7.7	ND	NA	8				
	7/1/83	7.6	1.4	NA	1				
	8/1/83	7.3	ND	NA	ND	(Not analyzed in NPDES sampling)			
008	3/1/83	7.0	4	370 *	NA				
009	(NO WATER DISCHARGE FROM 1/1/83 TO 8/1/83)								
010	1/1/83	7.1	70 *	NA	NA				
	3/1/83	7.0	27 *	NA	NA				
022	5/1/83	8.2	ND	NA	NA				
	6/1/83	7.5	4	NA	NA				
024	9/1/82	8.4	ND	0	NA				
	1/1/83	8.2	2	NA	NA				
	2/1/83	8.3	ND	NA	NA				
	3/1/83	8.5	ND	NA	NA				
	5/1/83	8.2	3	NA	NA				
	6/1/83	8.2	ND	NA	NA				
	7/1/83	7.6	1	NA	NA				
	8/1/83	7.9	2	NA	NA				
025	9/1/82	7.2	0	0	NA				
	(NO WATER DISCHARGE FROM 1/1/83 TO 8/1/83)								
026	(NO WATER DISCHARGE ON 9/1/82 NOR FROM 1/1/83 TO 8/3/83)								

Notes: 1. NPDES maximum permit requirements
2. New Mexico Water Quality Control Commission Regulations, Human Health Standards for Ground Water (no standards for other organics listed). Standards listed are for present and potential future use of ground water as domestic and agricultural water supply.
3. Period lasting through month indicated; maximum values reported.

See Figure 3.6 for station locations

ND = None detected Sparged: A chemical analysis procedure in which an air diffuser is used to create large bubbles.
NA = Not analyzed
mn-dy-yr = month-day-year *Analyses in which standards have been exceeded.
su = standard units

Source: USAF Plant No. 83 documents and McQuillan, et al., 1982.

Hudson (1982) describe the ground-water resources of the area. Studies by the U.S. Geological Survey (USGS) and the U.S. Environmental Protection Agency (EPA) are in-progress and are related to the generally designated area of "known and suspected ground-water pollution by organic compounds in the San Jose area of the South Valley of Albuquerque, New Mexico" (McQuillan, et al. 1982). Plant No. 83 is located in this generally designated area, the boundary of which has not been defined. Owners and occupants of Plant No. 83 have been named as one of the many potentially responsible parties of the ground-water contamination in the South Valley (Wright, 1983). The investigation of this area by EPA is being conducted under the authority of Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA). Some potentially responsible parties in the area have voluntarily completed an investigation or are presently investigating the ground-water conditions underlying their property. This report is Phase I of the Air Force investigation of Plant No. 83.

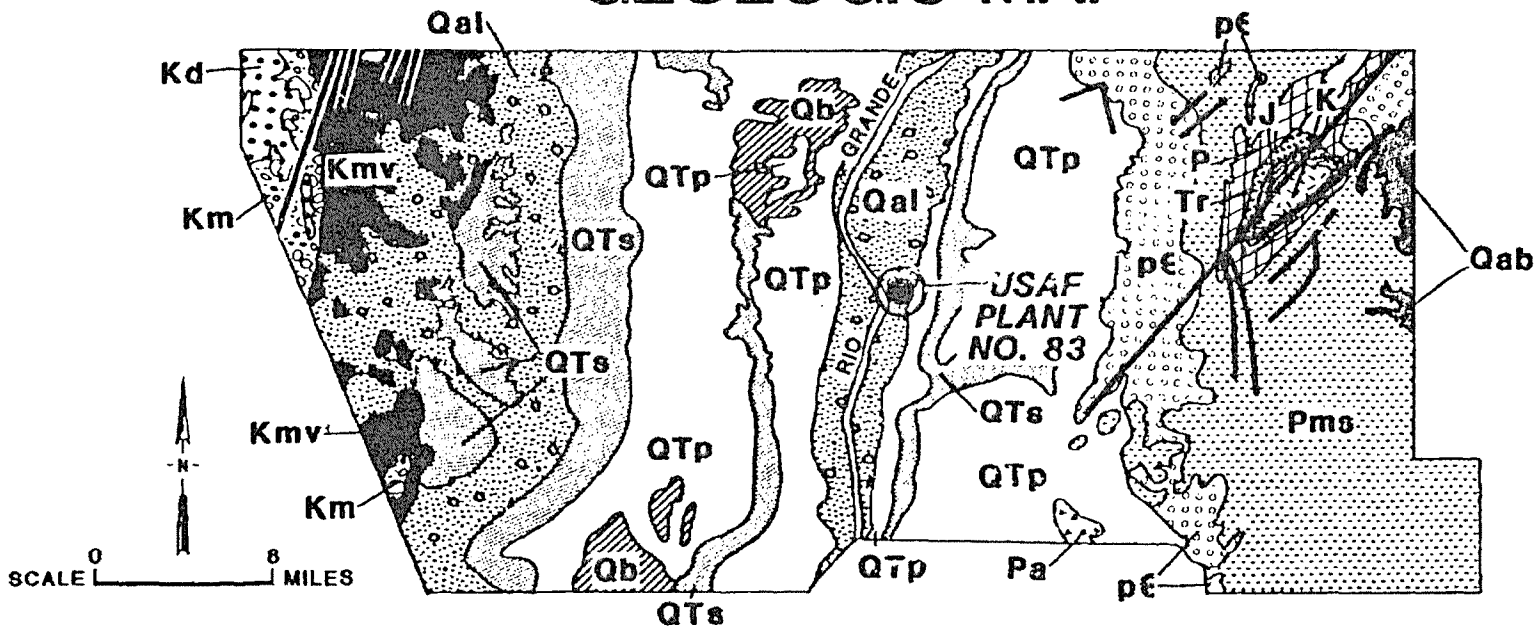
Hydrogeologic Units

Geologically, USAF Plant No. 83 is located in the outcrop area of Recent Alluvial deposits of sand, gravel, cobbles and clay. These deposits are approximately 120 feet thick underlying the plant. Other near-by geological outcrops include both unconsolidated sediments and consolidated rocks. The consolidated rocks consist of sedimentary, igneous and metamorphic units. Figure 3.7 is a geologic map of the area showing the numerous geologic outcrops while Figure 3.8 is a structural block diagram showing the approximate subsurface locations of selected geologic units. Table 3.4 summarizes the geologic units and their water-bearing characteristics. The Pediment/Santa Fe Group (undivided) are the major geologic units of concern in the area. These units are important because the City of Albuquerque withdraws its water supply from these units.

The Alluvial deposits underlying the plant have been penetrated by numerous soil test borings, three NMEID monitoring wells and two plant water wells. The log of test boring number 5 is shown on Figure 3.9. Clay is a dominant lithologic unit in this boring. Clay was also encountered by the three NMEID monitoring wells (SV8,SV9 and SV15) on the plant property. The clay is important as a semi-confining unit by

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

GEOLOGIC MAP



LEGEND

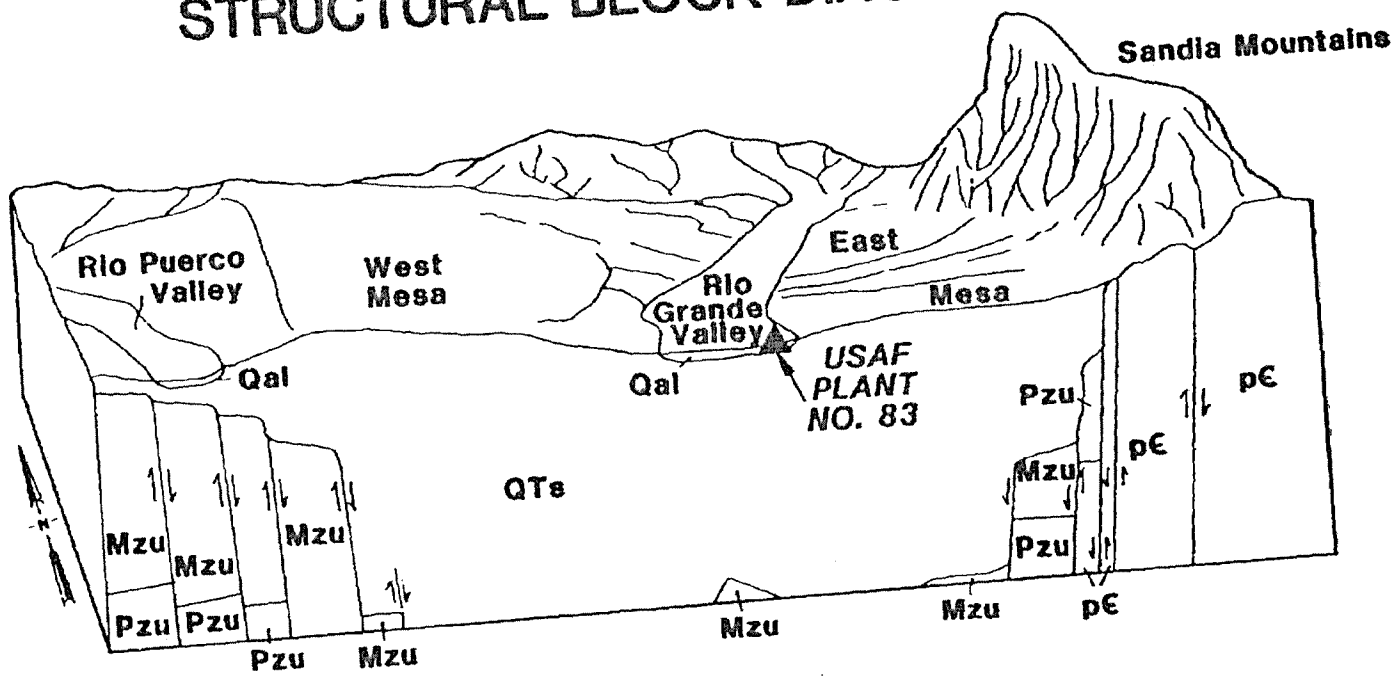
Qal	ALLUVIUM
Qab	ALLUVIUM AND BOLSON DEPOSITS
Qb	BASALT FLOWS
QTp	PEDIMENT
QTs	SANTA FE GROUP, UNDIVIDED
K	CRETACEOUS ROCKS, UNDIVIDED
Kd	DAKOTA SANDSTONE
Km	MANCOS SHALE
Kmv	MESAVERDE GROUP, UNDIVIDED
J	JURASSIC ROCKS, UNDIVIDED
Tr	TRIASSIC ROCKS, UNDIVIDED
P	PERMIAN ROCKS, UNDIVIDED
Pa	ABO SANDSTONE
Pms	MADERA LIMESTONE AND SANDIA FORMATION, UNDIVIDED
pЄ	PRECAMBRIAN ROCKS, UNDIVIDED
——	FAULT

SOURCE: DANE AND BACHMAN, 1965

FIGURE 3.7

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

STRUCTURAL BLOCK DIAGRAM



LEGEND

Qal ALLUVIUM

QTs SANTA FE GROUP, UNDIVIDED

Mzu SEDIMENTARY ROCKS, UNDIVIDED (SHALE & SANDSTONE)

Pzu SEDIMENTARY ROCKS, UNDIVIDED (LIMESTONE, SANDSTONE, SHALE)

pЄ GRANITIC AND METAMORPHIC ROCKS, UNDIVIDED

FAULT WITH DIRECTION OF MOVEMENT

HORIZONTAL SCALE 0 — 4 MILES

NOTE: APPROXIMATE LOCATION OF USAF PLANT NO. 83 IN ALBUQUERQUE AREA

SOURCE: BJORKLUND AND MAXWELL, 1961

FIGURE 3.8

TABLE 3.4

HYDROGEOLOGIC UNITS AND THEIR WATER-BEARING CHARACTERISTICS IN THE VICINITY OF USAF PLANT NO. 83

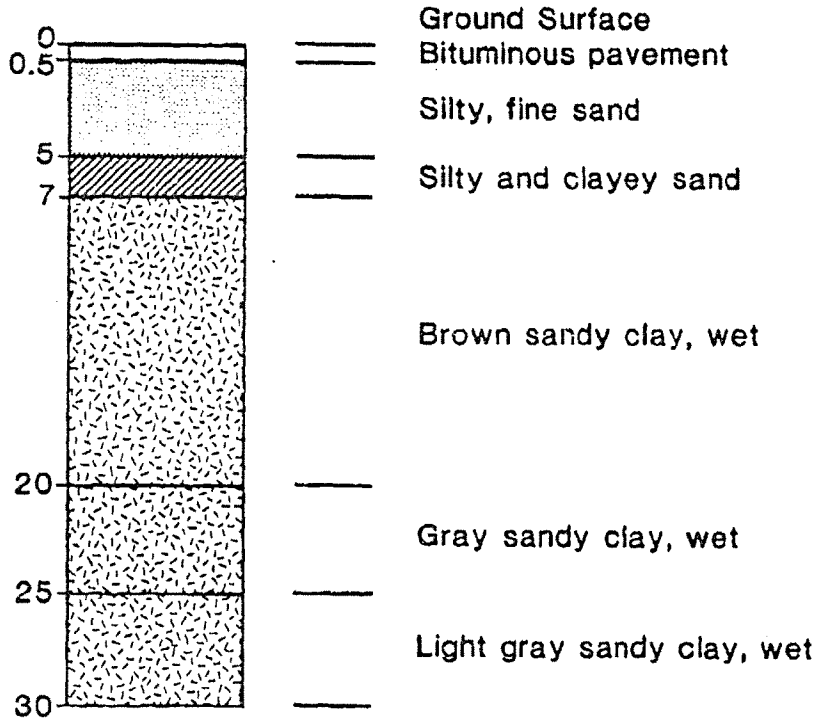
Era	System	Series	Unit	Approximate Thickness (Feet)	Hydrogeologic Classification	Dominant Lithology	Water-Bearing Characteristics
	Quaternary	Recent	Alluvium	120	Unconfined Aquifer	Sand, gravel, cobbles and clay.	Readily transmits water. Some wells yield as much as 3,000 gpm.
Cenozoic	Tertiary	Pleistocene	Sediment		Unconfined Aquifer	Sand, gravel and caliche	Readily transmits water. Transmissivities between 50,000 and 100,000 gpd/ft are common near the Rio Grande.
		Miocene	Santa Fe Group (Undivided)	>9,000		Sand, gravel and cobbles with clay. Unconsolidated to consolidated but weakly cemented.	
		Eocene	Espinaso Volcanic Rocks	1,400	Unknown	Breccia, conglomerate and tuff	No wells tap this unit because of great depth
		Eocene and Oligocene	Galisteo Formation	4,000	Unknown	Sand, clay, sandstone and shale	No wells tap this unit because of great depth.
Mesozoic	Cretaceous Jurassic Triassic	(Undivided)		7,100	Unconfined and Confined Aquifers	Sedimentary rocks	Moderately transmits water to wells on mesas and in adjoining areas.
Paleozoic	Permian Pennsylvanian	(Undivided)		5,100			
Precambrian		(Undivided)		>18,000	Unconfined and Confined Aquifers	Igneous and Metamorphic rocks	Transmits little water to wells in mountain areas.

Source: Bjorklund and Maxwell, 1961 and Dave and Bachman, 1965

gpm gallons per minute
gpd/ft gallons per day per foot

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

TEST BORING LOG NO. 5



Depth in feet
below ground surface

NOTE: SEE FIGURE 3.10 FOR TEST BORING LOCATION
SOURCE: USAF PLANT NO. 83 DOCUMENTS

reducing the possible downward migration of ground water. Figure 3.10 shows the location of two hydrogeologic cross sections of the plant's subsurface. The cross sections are shown on Figures 3.11 and 3.12. Clay is most abundant in wells SV9 and SV15 underlying the middle and northern sections of the plant. Clay is thickest (5.5 feet) in well SV15 where it is present from 2.5 to 8.0 feet below ground.

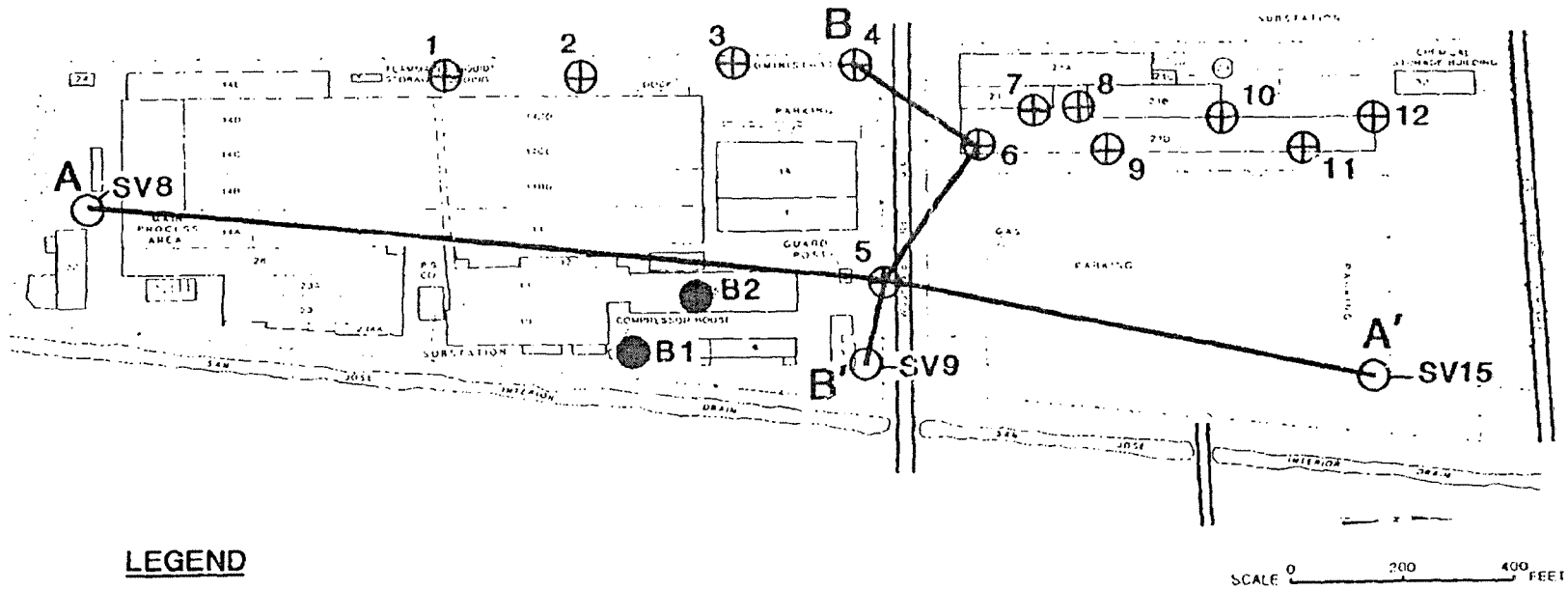
The Pediment/Santa Fe Group (undivided) which outcrop east of the plant are composed of sand, gravel and cobbles with moderate amounts of clay. Caliche, a calcium carbonate cemented zone of soil, is also present in these units near the plant as are zones of cemented sandstone.

Hydrologically, USAF Plant No. 83 is located in an area of large ground-water use. Due to the large amount of ground-water pumpage by the city of Albuquerque the once southwesterly direction of regional ground-water flow has changed to a northeasterly and easterly direction of flow. Figure 3.13 shows the 1960 configuration of the regional water table. The effects of the San Jose Well Field are not apparent in this figure, but are very apparent in Figure 3.14, the 1978 configuration of the regional water table. In 1980 major water producing wells (SJ3, SJ6 and Miles No. 1) northeast and east of the plant were shut down due to contamination. Miles No. 1 was put back on line in 1981. Figure 3.15 shows the approximate regional water-table configuration in the Spring of 1981. Due to increased pumpage from other Albuquerque wells further east and northeast of the plant the direction of regional ground-water flow remained easterly in 1981. Water-level measurements made in July 1983 by the USGS are being analyzed and will become part of a report planned for publication in the near future (Kues, 1983).

Water-level measurements made in December 1982 by the NMEID indicate that locally there exists three major hydrologic features near the plant. These features are (1) low horizontal hydraulic gradients, (2) two distinct hydrologic units and (3) ground-water leakage from the shallow water-table aquifer to the regional water-table aquifer. The first feature of low horizontal hydraulic gradients can be inferred from the water-level elevations in Figure 3.16. Wells less than 25 feet deep within the shallow water-table aquifer display water-table conditions with water-level elevations between 4919 and 4923 NGVD. The horizontal

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

LOCATION OF TEST BORINGS, WELLS, AND HYDROGEOLOGIC CROSS SECTIONS



LEGEND

- ⊕ TEST BORING (CONSTRUCTION FOUNDATION)
- ○ MONITOR WELL
- ● WATER SUPPLY WELL (UNUSED)
- A–A' LOCATION OF HYDROGEOLOGIC CROSS-SECTION

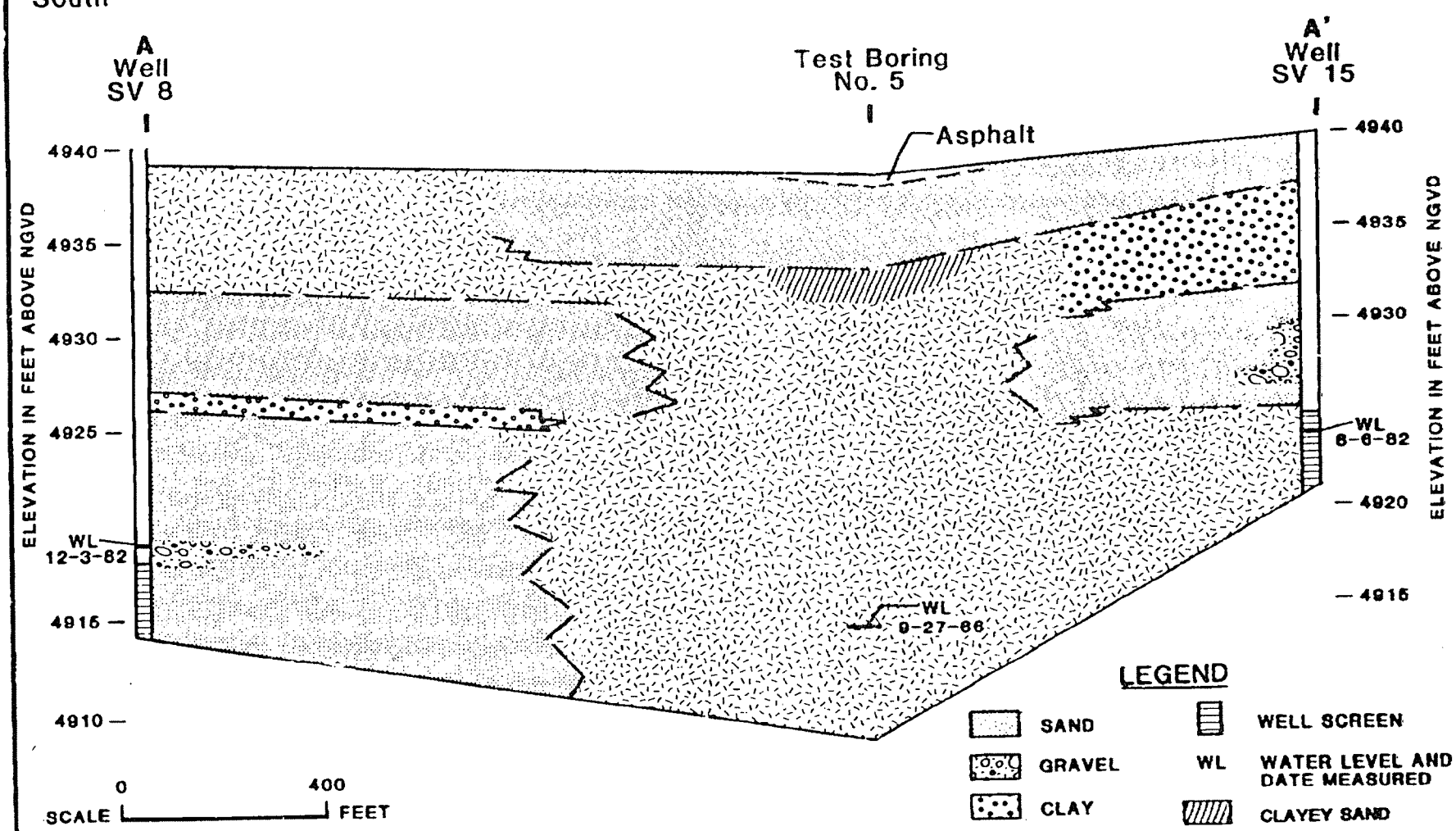
NOTE: SEE FIGURES 3.11 AND 3.12 FOR HYDROGEOLOGIC CROSS-SECTIONS

SOURCE: USAF PLANT NO. 83 DOCUMENTS AND McQUILLAN, et al., 1982

FIGURE 3.10

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

HYDROGEOLOGIC CROSS SECTION A – A'

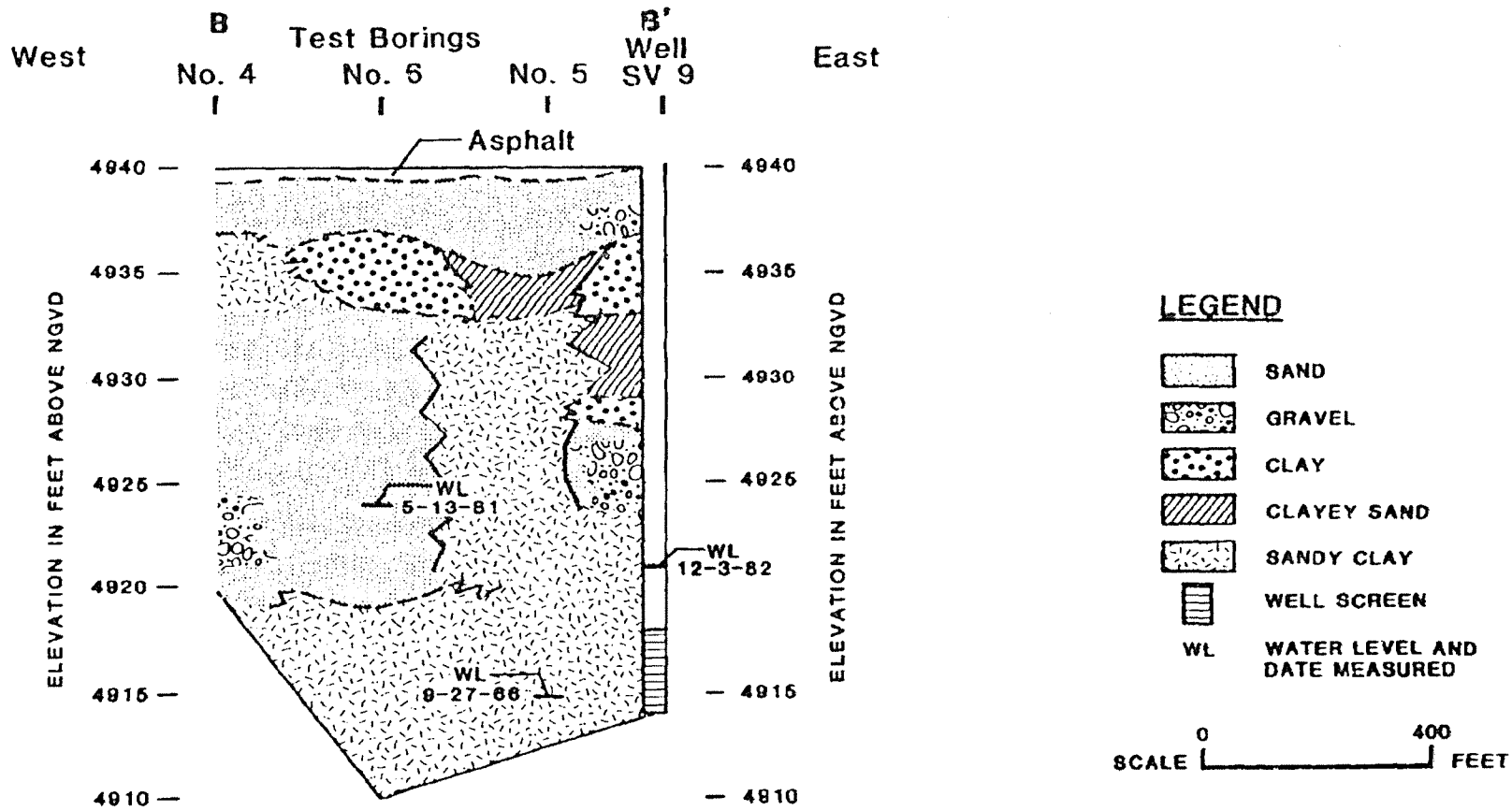


NOTE: SEE FIGURE 3.10 FOR CROSS SECTION LOCATION
SOURCE: USAF PLANT NO. 83 DOCUMENTS AND McQUILLAN, et al., 1982

FIGURE 3.11

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

HYDROGEOLOGIC CROSS SECTION B – B′

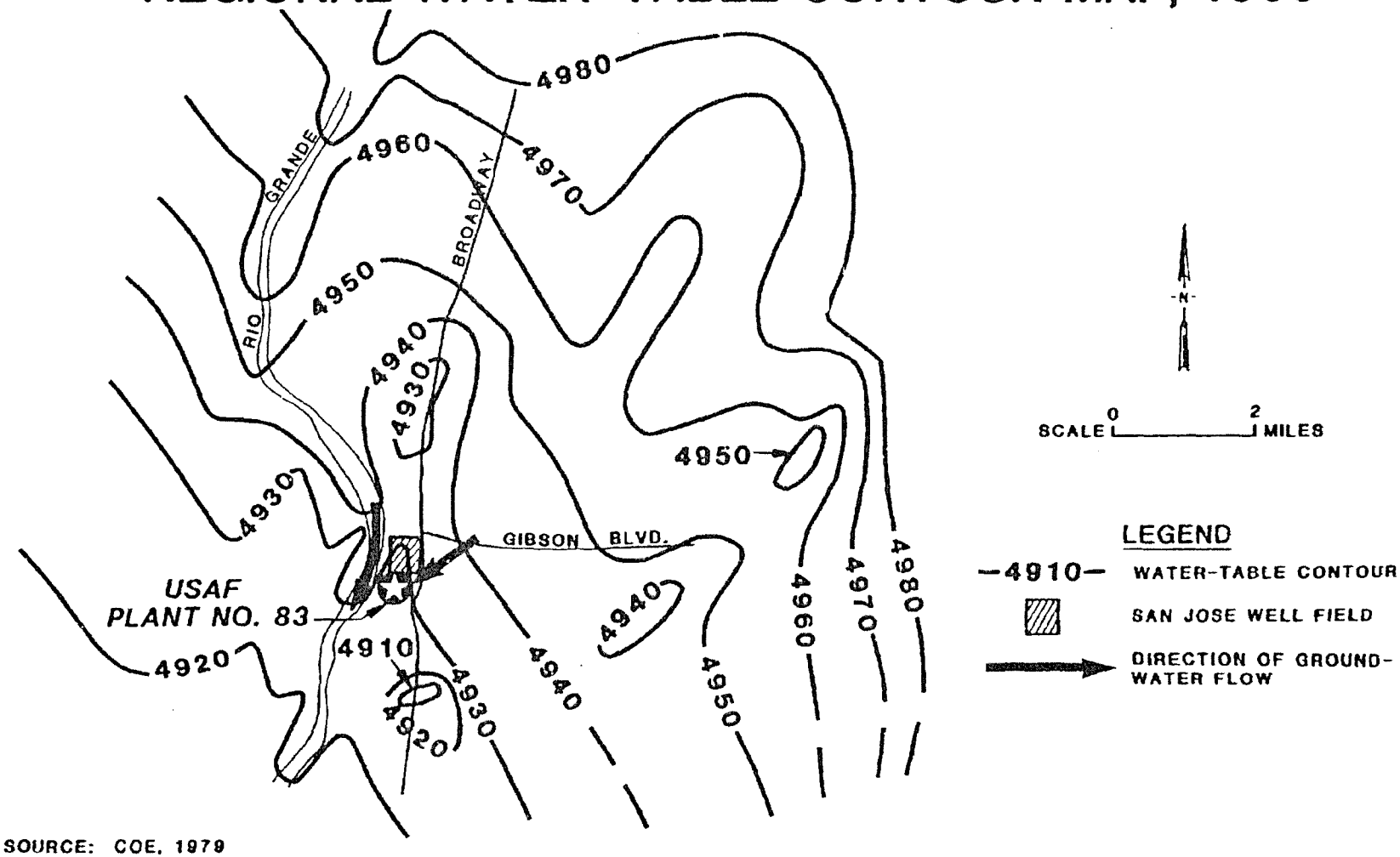


NOTE: SEE FIGURE 3.10 FOR CROSS SECTION LOCATION
SOURCE: USAF PLANT NO. 83 DOCUMENTS AND McQUILLAN, et al., 1982

FIGURE 3.12

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

REGIONAL WATER-TABLE CONTOUR MAP, 1960



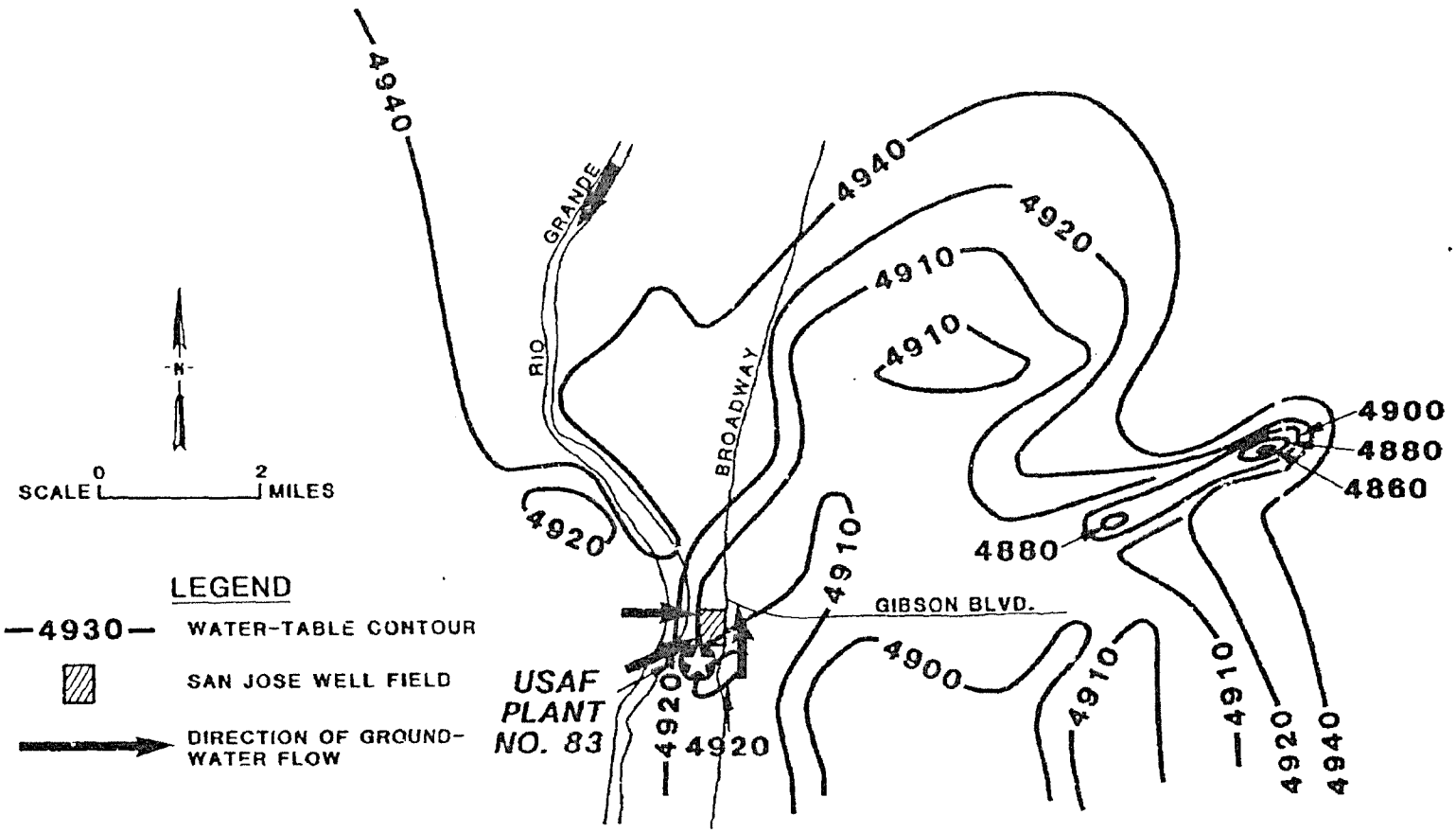
SOURCE: COE, 1979

FIGURE 3.13

USAF PLANT NO. 83

GENERAL ELECTRIC ALBUQUERQUE PLANT

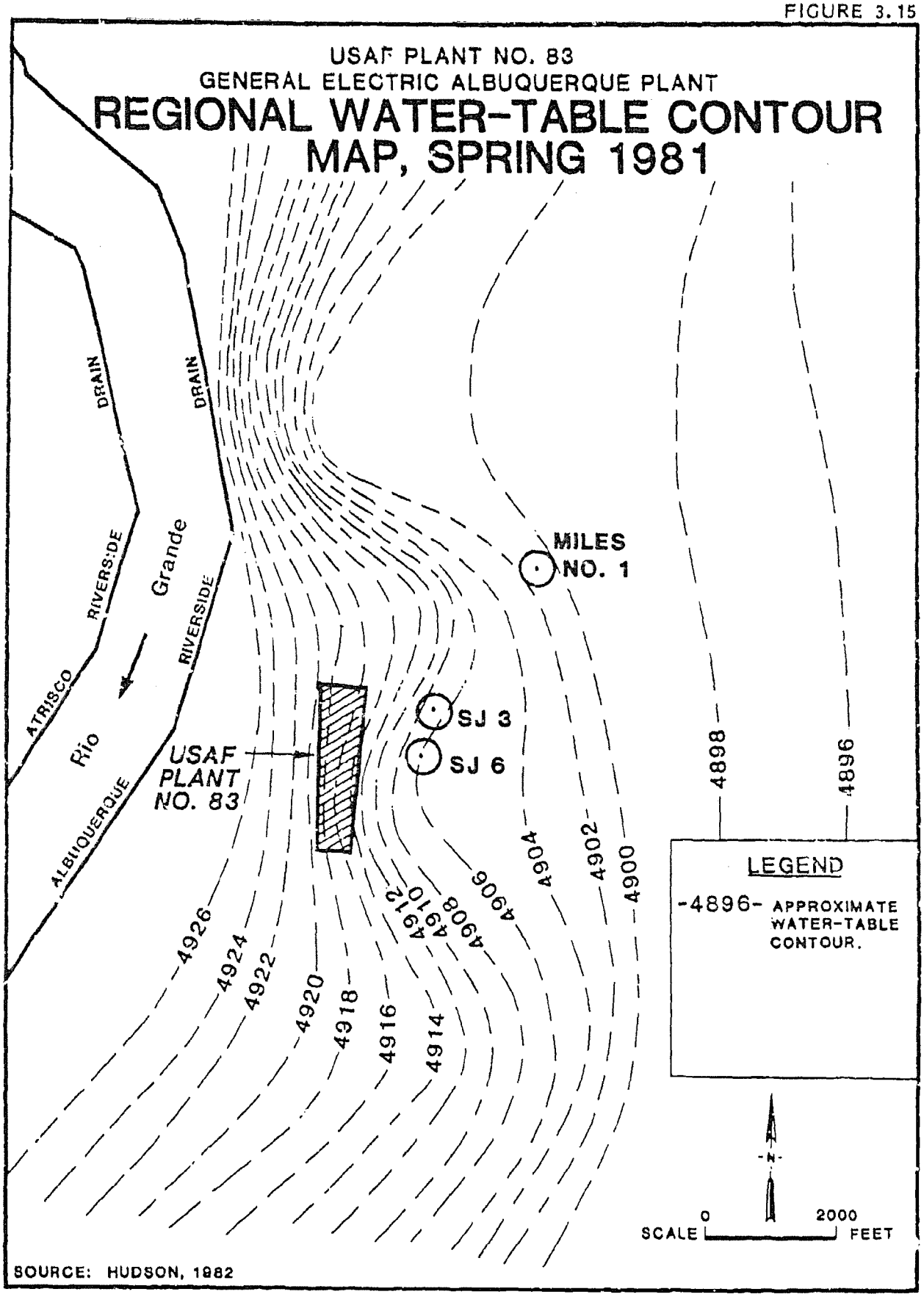
REGIONAL WATER-TABLE CONTOUR MAP, 1978



SOURCE: COE, 1978

FIGURE 3.14

FIGURE 3.15



SOURCE: HUDSON, 1982

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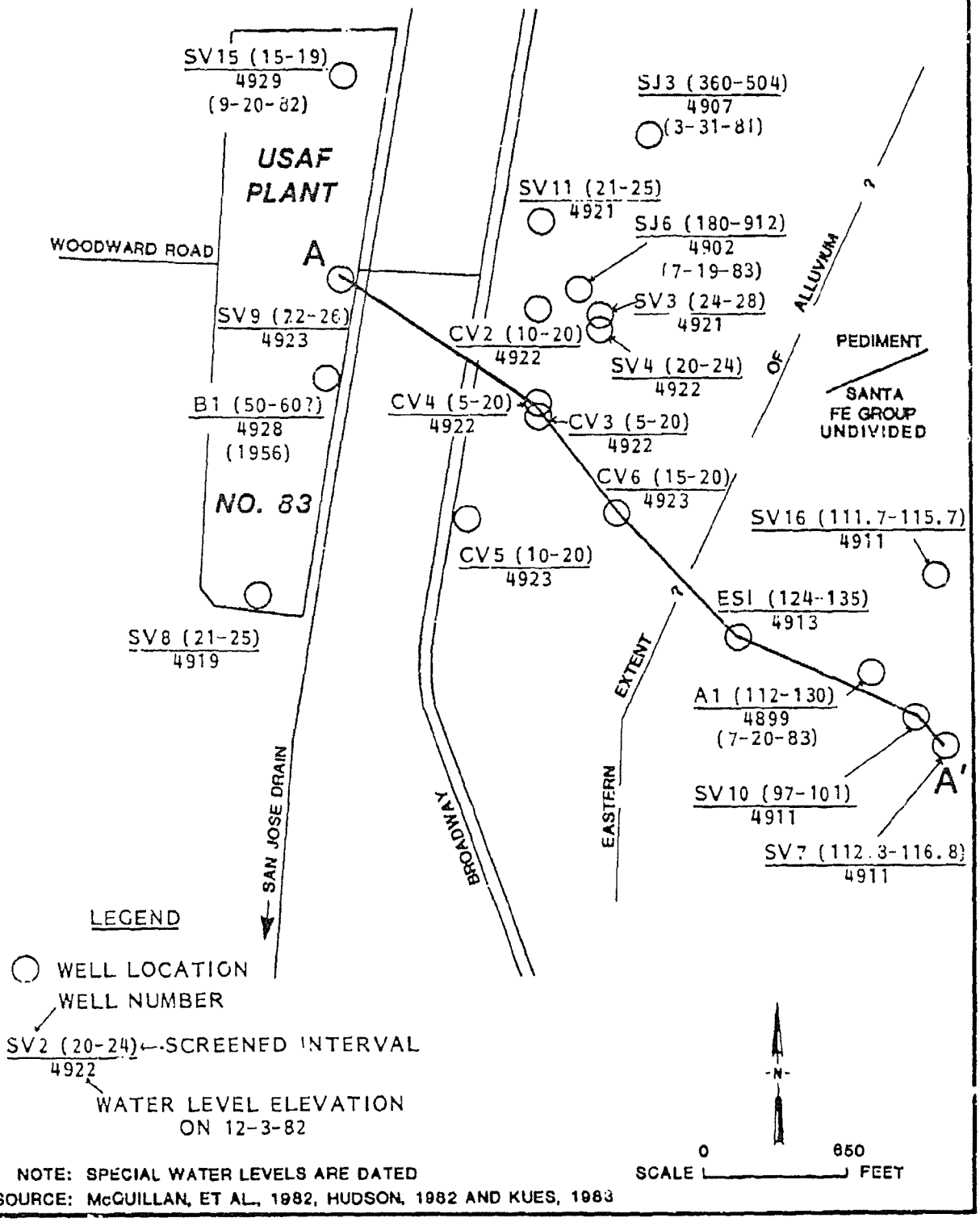
FIGURE 3.16

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

WELL CONSTRUCTION AND WATER-LEVEL DATA FOR SELECTED WELLS



NOTE: SPECIAL WATER LEVELS ARE DATED
SOURCE: McGUILLAN, ET AL., 1982, HUDSON, 1982 AND KUES, 1983

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hydraulic gradient is approximately 0.002 (2 feet per 1000 feet) near the plant. These wells are on plant property and within the Alluvium. The importance of this feature is the lack of a significant hydraulic head to cause ground water in the shallow water-table aquifer to move appreciably west to east from the plant to wells SJ3 and SJ6 in the San Jose Well Field. This condition may change if SJ3 and SJ6 resume pumping.

The second feature of two distinct hydrologic units can be seen from the difference in water-level elevations east and west of the geological extent of the Alluvium. Water levels in general are approximately ten feet lower in elevation on the east than on the west of the geological boundary. This feature displayed locally by the December 1982 water levels has been mapped regionally by Bjorklund and Maxwell, 1961. Note also that the 1983 water-level elevation of well SJ6, which taps the regional water-table aquifer and has been shut down for approximately three years, is well below those of the shallower wells which are also under water-table conditions. The SJ6 water level has been affected by a continual regional water-table decline in the Albuquerque area (Corps of Engineers, 1974). The wells east of the geological boundary have water levels similar to those of wells SJ3 and SJ6 indicating good hydraulic connection between the city wells and the wells east of the geologic boundary. The feature of two distinct hydrologic units is important in that a relatively isolated shallow water-table aquifer now exists under the plant and just east of the plant where SJ3 and SJ6 are located. The shallow water-table levels have not been affected by the regional water-table decline. Prior to 1978 the two aquifers had similar water levels indicating a one-flow system. The clays mentioned earlier as being present under the plant apparently contained ground water in this shallow aquifer as the ground-water level in the regional aquifer declined. Therefore, the clays may limit the hydraulic connection between the shallow water-table aquifer and the regional water-table withdrawal zones of SJ3 and SJ6 in the deeper Santa Fe Group (undivided). This hydraulic connection may increase if SJ3 and SJ6 resume pumping.

The third feature of ground-water leakage from the shallow water-table aquifer to the regional water-table aquifer is illustrated

in Figure 3.17. The cross-section location shown in Figure 3.17 is located on Figure 3.16 from well SV9 on the plant property to well SV7 southeast of the plant. Leakage of ground water may occur vertically down from the shallow water-table aquifer in the shallow Alluvium to deeper alluvial deposits and the Santa Fe Group (undivided). Although the water level measurement dates differ for the two aquifers, historical water level data indicates that the vertical migration potential has existed at the plant since 1978. These facts are important in that ground water directly underlying the plant may migrate vertically to the deeper alluvial deposits and Santa Fe Group (undivided), although the low permeability of the underlying clays would tend to limit vertical ground-water leakage. Data presently available does not allow the complete evaluation of the leakage potential.

Two other important concerns in terms of leakage and recharge are the facts that the San Jose Drain recharges the shallow water-table aquifer and that the Ric Grande being controlled by levees and canals is approximately eight feet above the shallow water-table (Bjorklund and Maxwell, 1961). The Rio Grande also recharges the shallow water-table aquifer.

Ground-Water Quality

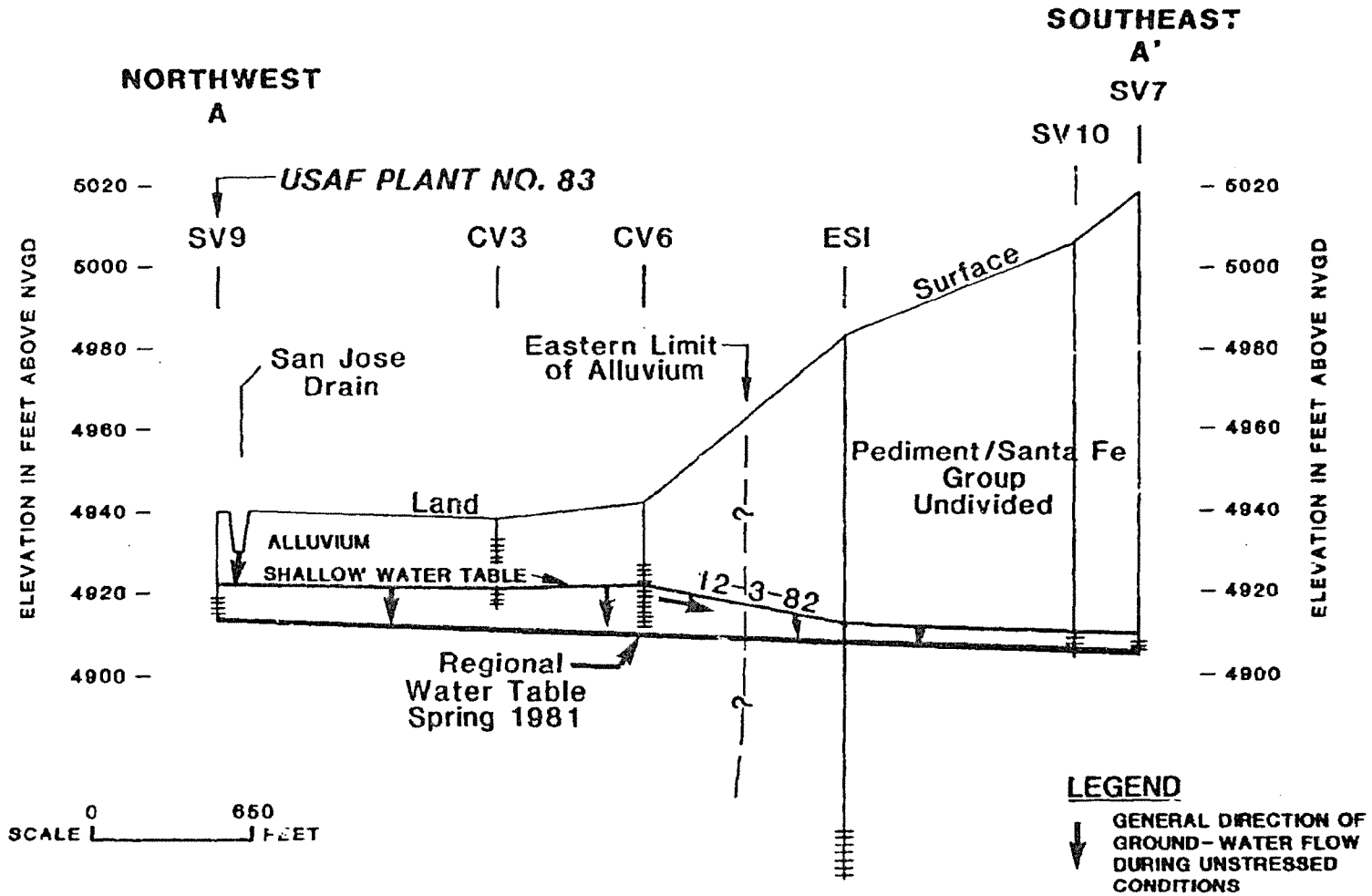
Ground-water quality in the vicinity of the plant has been investigated by McQuillan, et. al. 1982 and numerous potentially responsible parties named as possible contributors to the ground-water contamination in the South Valley of Albuquerque. Investigations in the general Rio Grande Valley of Albuquerque have documented ground-water contamination by nitrate from septic tanks, agricultural facilities, dumpsites and nitrate-contaminated surface water (McQuillan, 1982). Contamination by petroleum products from service station gasoline tanks and bulk fuel facilities has also been documented by McQuillan.

Plant No. 83 is located in the South Valley where wells SJ3 and SJ6 continue to be shut down due to organic contamination. Other wells which have been shut down due to past contamination problems are A1, C1 and ESI. Figure 3.18 illustrates the ground-water contamination problem in the vicinity of the plant. Seven wells in the area have ground water in which organic contaminants have exceeded the NMWQCC Human Health

USAF PLANT NO. 83

GENERAL ELECTRIC ALBUQUERQUE PLANT

VICINITY HYDROLOGIC CROSS SECTION



NOTE: SEE FIGURE 3.16 FOR CROSS SECTION LOCATION

SOURCE: McQUILLAN, et al., 1982 AND HUDSON, 1982

FIGURE 3.17

Standards. More varied organic contaminants in significantly higher concentrations have been detected in deeper monitoring wells in the area east of the vacated San Jose Lateral than in the vicinity of the plant. Table 3.5 summarizes significant ground-water quality analyses in the area. Appendix C-1 summarizes additional ground-water quality data for the area. The only organic contaminant which can be compared to a standard was found in shallow well SV15 underlying the plant. A concentration of 0.009 mg/l 1,1-Dichloroethene was sampled on September 8, 1982. This concentration is 0.004 mg/l over the NMWQCC Human Health Standard of 0.005 mg/l. Other organic contaminants in trace amounts detected at the plant monitoring wells were the following:

Well	Contaminant
SV8	1,1,2,2-Tetrachloroethane
SV9	1,2-Dichloroethane
	1,1,1-Trichloroethane
	Tetrachloroethene
SV15	1,1-Dichloroethane
	1,1,1-Trichloroethane
	Trichloroethene

Metal contaminants were also detected in the shallow plant monitoring wells. Metals which exceeded the MNWQCC Human Health Standards were arsenic, barium, total chromium and lead. Of these contaminants, 1,1,1-Trichloroethane, chromium, and lead are the only materials which have been utilized in significant quantities at the plant. Wells tapping the regional water-table aquifer underlying the plant have not been installed. The sources of the contaminants within the shallow water-table aquifer have not been identified.

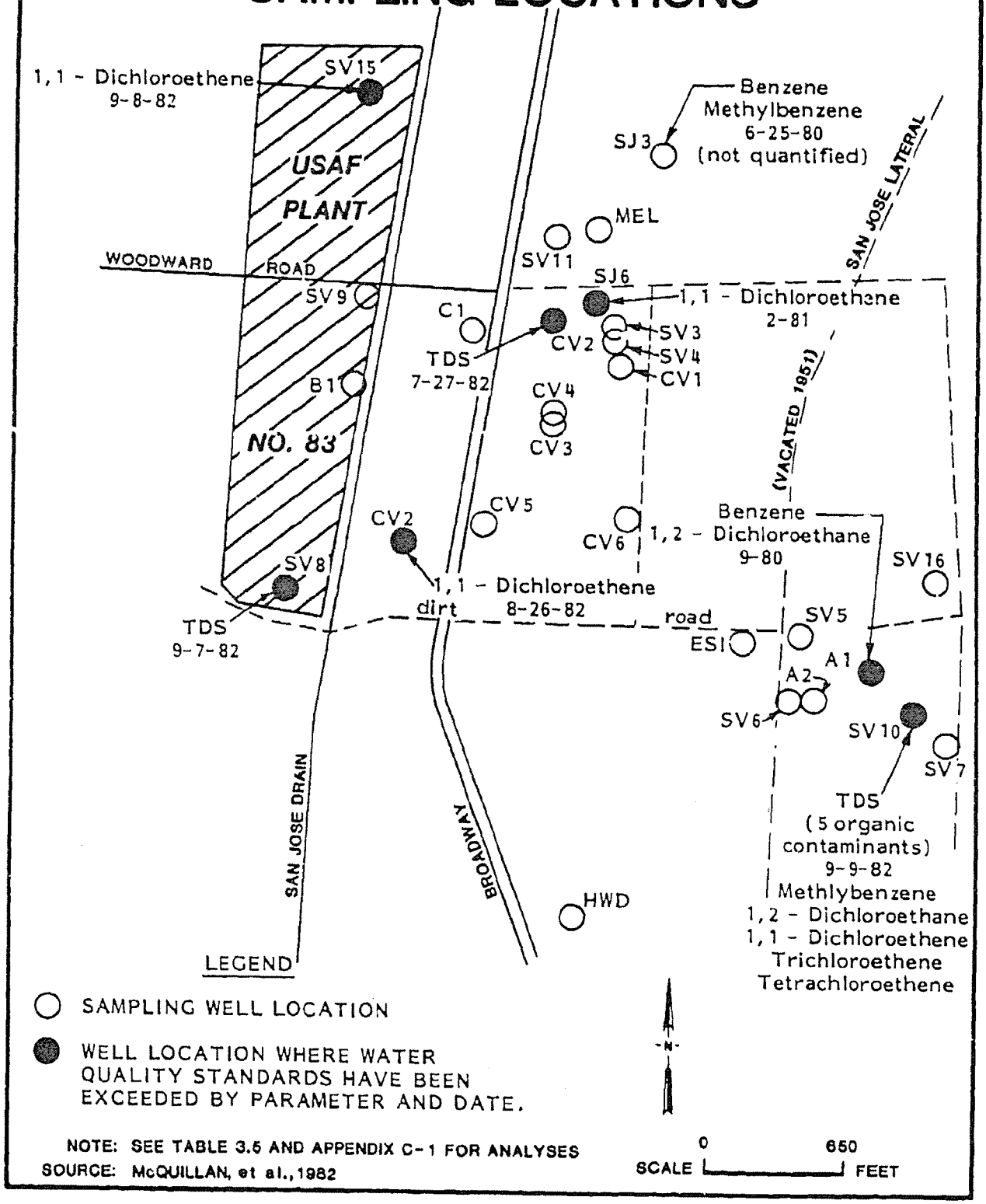
Ground-Water Use

Ground water in the Aubuquerque area is the only source of public water supply at the present time. Due to the importance of ground water the Rio Grande Basin has been officially designated as a "declared underground water basin" (New Mexico State Engineer, 1974). The basin ground water is regulated as a sole source of potable water. There are eighteen water supply well fields operated by the City of Albuquerque. The San Jose Well Field is near the plant as shown in Figure 3.19. Only

FIGURE 3.18

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

GROUND-WATER QUALITY SAMPLING LOCATIONS



NOTE: SEE TABLE 3.5 AND APPENDIX C-1 FOR ANALYSES
SOURCE: McQUILLAN, et al., 1982

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TABLE 3.5

SELECTED GROUND-WATER QUALITY DATA
FOR USAF PLANT NO. 83 AND VICINITY

(Parameter analyses are presented in milligrams per liter)

Well Identification	Date (mm-dy-yr)	Chloride [1] (250)	Total Dissolved Solids (1000)	Benzene (0.01)	Methyl-benzene (0.01)	Tetra-chloro-methane (0.01)	1,2-Dichloro-ethane (0.02)	1,1-Dichloro-ethene (0.005)	Trichloro-ethene (0.1)	Tetra-chloro-ethene (0.02)	Acetone (NS)	Methyl Ethyl Ketone (NS)
A1, Amerigas Well	7-23-80	NA	NA	ND	ND	ND	0.097	ND	ND	<0.001	NA	NA
B1, Plant No. 83, Well No. 2	2-25-82	NA	NA	ND	ND	ND	ND	ND	ND	ND	NA	NA
C2, Texaco Well	8-26-82	41.3	576	ND	ND	ND	0.0006	0.011	0.019	0.001	NA	NA
CV2, Chevron Monitor Well	7-27-82	54.7	2219	NA	NA	NA	NA	NA	NA	NA	NA	NA
NWD, New Mexico Hwy. Dept. Well	9-15-82	126.49	862	ND	ND	ND	ND	ND	ND	ND	ND	ND
MEL, Melchor Well	4-01-82	NA	NA	ND	ND	ND	ND	ND	ND	ND	NA	NA
SJ1, Albuquerque City Well	6-25-80	36	329	DNQ	DNQ	ND	ND	ND	ND	ND	ND	ND
[2]SJ6, Albuquerque City well	6-25-80	33	300	DNQ	DNQ	ND	ND	DNQ	DNQ	DNQ	ND	ND
SV5, NMEID Monitor Well	9-17-82	NA	NA	ND	ND	ND	ND	ND	0.0057	0.003	NA	NA
SV7, NMEID Monitor Well	8-25-82	9.2	171	ND	ND	ND	0.006	0.005	0.002	0.001	NA	NA
[2]SV8, NMEID Plant No. 83	9-07-82	98.8	1517	ND	ND	ND	ND	ND	ND	ND	NA	NA
[2]SV9, NMEID Plant No. 83	9-08-82	39.5	507	ND	ND	ND	0.0015	ND	ND	0.0018	NA	NA
[2]SV10, NMEID Monitor Well	9-09-82	2462	7066	ND	0.6	ND	1.7	9.0	6.0	20.0	150.0	6.0
[2]SV15, NMEID Plant No. 83	9-08-82	37.3	874	ND	ND	ND	ND	0.009	0.0006	ND	NA	NA

NOTES: 1 New Mexico Water Quality Control Commission Human Health Standards
2. See Appendix C-1 for additional water quality data.
See Figure 3.18 and 3.20 for well locations.
See Table 3.6 for well construction data.

NS = No Standard
ND = Not detected
NA = Not analyzed
DNQ = Detected but not quantified
NMEID = New Mexico Environmental Improvement Division

Source: USGS, 1981, McQuillan, et al., 1982, and Wilson Laboratories, 1982

TABLE 3.5
(Continued)
SELECTED GROUND-WATER QUALITY DATA
FOR USAF PLANT NO. 83 AND VICINITY
(Parameter analyses are presented in milligrams per liter)

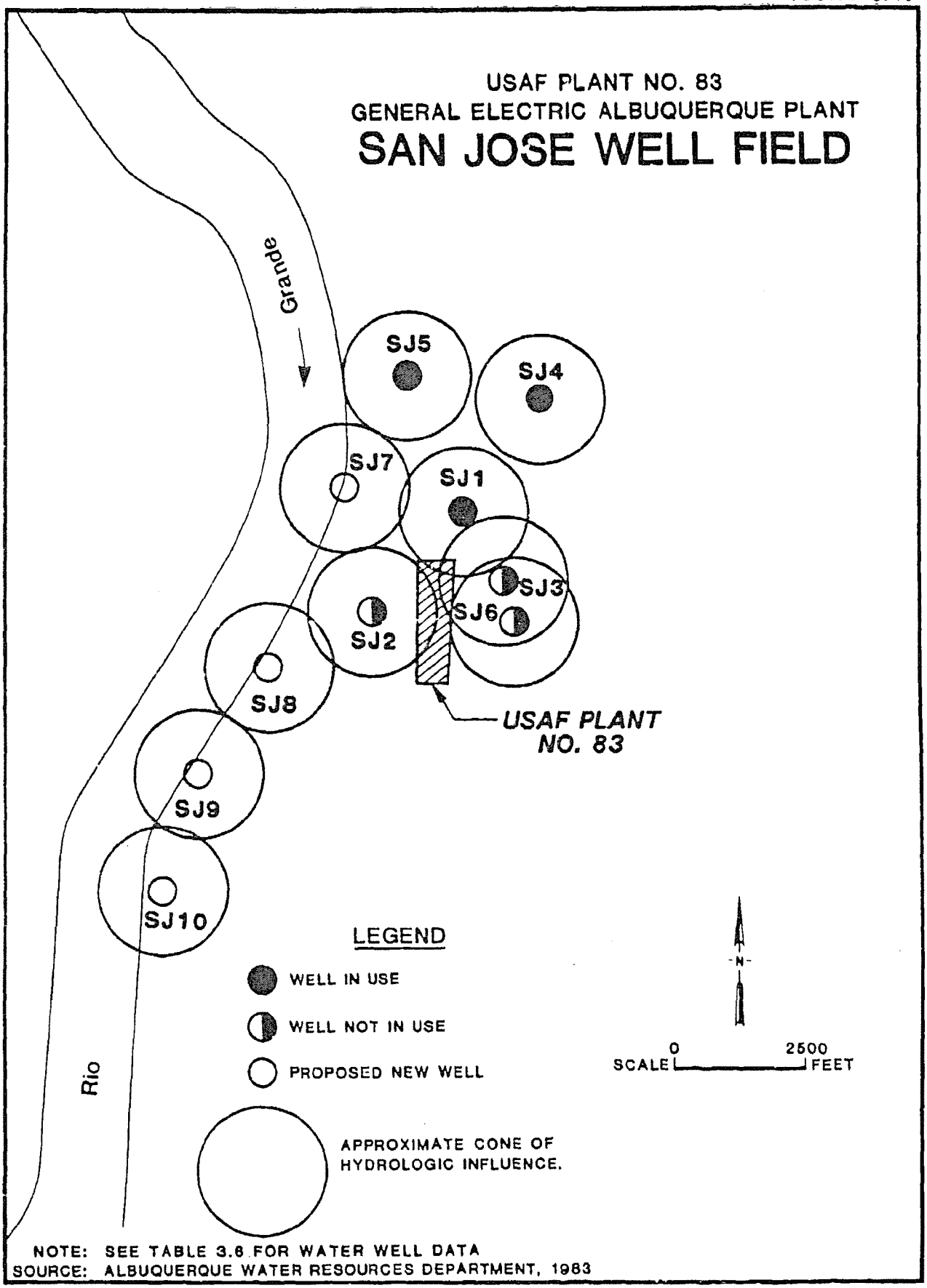
Well Identification	Date of Sample Collection (mo-dy-yr)	Parameter							
		Arsenic (0.1)	Barium (1.0)	Cadmium (0.01)	Total Chromium (0.05)	Lead (0.05)	Mercury (0.002)	Selenium (0.05)	Silver (0.05)
B1, Plant No. 83, Well No. 2	2-25-82	0.0014	0.069	0.00016	0.0013	ND	ND	ND	ND
SV8, NMEID Plant No. 83	9-7-82	0.093	3.7	0.0035	0.09	0.17	0.0002	0.0086	ND
SV9, NMEID, Plant No. 83	9-8-82	0.14	14.3	0.0076	0.21	0.7	0.004	0.0033	0.0010
SV15, NMEID Plant No. 83	9-8-82	0.13	3.8	0.0036	0.12	0.18	0.00064	0.0027	0.0007
[2]SJ6, Albuquerque City Well	6-25-80	0.021	0.1	<0.001	0.010	0	0	0	0

NOTES: 1. New Mexico Water Quality Control Commission Human Health Standards
2. See Appendix C-1 for additional water quality data.
See Figures 3.18 and 3.20 for well locations.
See Table 3.6 for well construction data.

NS = No Standard
ND = Not detected
NA = Not analyzed
DNQ = Detected but not quantified
NMEID = New Mexico Environmental Improvement Division

Source: USGS, 1981, McQuillan, et al., 1982, and Wilson Laboratories, 1982

FIGURE 3.19



NOTE: SEE TABLE 3.6 FOR WATER WELL DATA
SOURCE: ALBUQUERQUE WATER RESOURCES DEPARTMENT, 1983

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three of the possible six existing wells are presently pumping water. Wells SJ1, SJ4 and SJ5 are presently in use. Wells SJ3 and SJ6 are shut down due to contamination. Well SJ2 is not fully operational at the present time for mechanical reasons (Pirooz, 1983).

During 1982 Plant No. 83 used approximately 0.8 million gallons of ground water per day (Rhoades, 1983). All water used at the plant comes from the City of Albuquerque. A majority of the water used is for non-contact cooling purposes and is discharged to the San Jose Drain.

Other ground-water uses in the Albuquerque area include irrigation, industrial and domestic uses. Table 3.6 summarizes the ground-water uses and well construction data for wells in the immediate vicinity of the plant. Figure 3.20 shows the location of the wells in the immediate vicinity of the plant.

BIOTIC ENVIRONMENT

Within the Albuquerque area there are eight species of animals which have been listed as endangered or threatened by Federal or New Mexico agencies (Hubbard, et al., 1979). They are as follows:

Black-footed ferret (weasel)	Federal endangered
Mississippi kite (bird)	State endangered
Bald eagle	Federal and State endangered
Peregrine falcon	Federal and State endangered
Red-headed woodpecker	State endangered
McCown's longspur (bird)	State endangered
Bluntnose shiner (fish)	State endangered
Silvery minnow	State endangered

There are no Federally- or State-listed endangered or threatened species on USAF Plant No. 83.

SUMMARY OF ENVIRONMENTAL SETTING

The environmental setting data for USAF Plant No. 83 indicate the following facts are important when evaluating past hazardous waste disposal practices.

TABLE 3.6
WATER WELL DATA FOR USAF PLANT NO. 83 AND VICINITY

Well Identification	Owner and/or Location	Depth (Feet) Casing	Depth (Feet) Screen	Depth (Feet) Total	Diameter (inches)	Hydrogeologic Unit(s) Tapped By Well	Water Level (feet) Below Land Surface	Water Level (feet) Date (mn-dy-yr)	Water Level (feet) Approximate Elevation Below NGVD	Yield (gpm)	Use
A1	Amerigas Company	112	20	132	10	QTs	102.04	7/20/83	4899	NR	I/A
A2	Amerigas Company	510	12	522	5	QTs	118	1980	4773	NR	I
* B1	USAF Plant No. 83 Well No. 2, Bldg. 16	NR	NR	62	8	Qal	12	1956	4927	428	I/A
* B2	USAF Plant NO. 83 Well NO. 1, Bldg. 5	NR	NR	65	8	Qal	11	1953	4926	NR	I/A
C1	Conoco Oil Company	82	12	94	NR	Qal	NR	NR	NR	NR	I/A
C2	Texaco Oil Company	NR	NR	66	10	Qal	NR	NR	NR	NR	I/A
CV1	Chevron Oil Company	10	20	30	2	Qal	20.54	12-3-82	4921	NR	M
CV2	Chevron Oil Company	10	20	30	2	Qal	17.71	12-3-82	4921	NR	M
CV3	Chevron Oil Company	5	20	25	2	Qal	17.45	12-3-82	4922	NR	M
CV4	Chevron Oil Company	5	20	25	2	Qal	17.63	12-3-82	4922	NR	M
CV5	Chevron Oil Company	10	20	30	2	Qal	15.44	12-3-82	4922	NR	M
CV6	Chevron Oil Company	15	20	35	2	Qal	20.68	12-3-82	4923	NR	M

gpm = gallons per minute
mn-dy-yr = month-day-year

A = Abandoned
D = Domestic
I = Industrial
M = Monitor
U = unused

P = Public Supply
Qal = Alluvium
QTs = Santa Fe Group, Undivided
NR = Not Recorded
NMEID = New Mexico Environmental Improvement Division
NGVD = National Geodetic Vertical Datum of 1929

See Figures 3.19 and 3.20 for well location.
See Table 3.5 and Appendix C-1 for water quality data.

*Wells on USAF Plant No. 83 property

Source: Bynon, 1983, McQuillan, et al., 1982 and Hudson, 1982.

TABLE 3.6
(Continued)
WATER WELL DATA FOR USAF PLANT NO. 83 AND VICINITY

Well Identification	Owner and/or Location	Depth (Feet) Casing	Depth (Feet) Screen	Depth (Feet) Total	Diameter (inches)	Hydrogeologic Unit(s) Tapped By Well	Water Level (feet) Below Land Surface	Water Level (feet) Date (mn-dy-yr)	Water Level (feet) Approximate Elevation Below NGVD	Yield (gpm)	Use
ESI	Environmental Services, Inc.	NR	NR	NR	6	NR	71.64	12-3-82	4913	NR	I/A
HWD	New Mexico State Highway Dept.	NR	NR	70	6	Qal	NR	NR	NR	15	I
MEL	H. Melchor	NR	NR	56	2	Qal	12	1957	4929	NR	D
SJ1	Albuquerque, San Jose Well Field	NR	NR	306	NR	QTs	35.3	4-3-81	4915	NR	P
SJ2	San Jose Well Field	NR	NR	NP	NR	NR	NR	NR	NR	NR	P/U
SJ3	San Jose Well Field	360	144	504	NR	QTs	47.2	3-31-81	4907	1,000	P/U
SJ4	San Jose Well Field	268	732	1,000	NR	QTs	92.4	4-2-81	4900	NR	P
SJ5	San Jose Well Field	192	840	1,032	NR	QTs	43.7	4-1-81	4902	NR	P
SJ6	San Jose Well Field	180	732	912	NR	QTs	38.58	7-19-83	4902	NR	P/U
SJ7 thru 10	San Jose Well Field		(Proposed New Wells)								
SV3	NMEID	24	4	28	2	Qal	18.49	12-3-82	4920	NR	M

gpm = gallons per minute
mn-dy-yr = month-day-year

A = Abandoned
D = Domestic
I = Industrial
M = Monitor
U = Unused

P = Public Supply
Qal = Alluvium
QTs = Santa Fe Group, Undivided
NR = Not Recorded
NMEID = New Mexico Environmental Improvement Division
NGVD = National Geodetic Vertical Datum of 1929

See Figures 3.19 and 3.20 for well location.
See Table 3.5 and Appendix C-1 for water quality data.

*Wells on USAF Plant No. 83 property

Source: Bynon, 1983, McQuillan, et al., 1982 and Hudson, 1982.

TABLE 3.6
(Continued)
WATER WELL DATA FOR USAF PLANT NO. 83 AND VICINITY

Well Identification	Owner and/or Location	Depth (Feet) Casing	Depth (Feet) Screen	Depth (Feet) Total	Diameter (inches)	Hydrogeologic Unit(s) Tapped By Well	Water Level (feet) Below Land Surface	Water Level (feet) Date (mn-dy-yr)	Water Level (feet) Approximate Elevation Below NGVD	Yield (gpm)	Use
SV4	NMEID	20	4	24	2	Qal	18.15	12-3-82	4921	NR	M
SV5	NMEID	92	4	96	2	Qal	88.9	11-15-82	4912	NR	M
SV6	NMEID	92.5	4	96.5	2	Qal	91.69	11-15-82	4909	NR	M
SV7	NMEID	112.8	4	116.8	2	QTs	108.88	12-3-82	4911	NR	M
* SV8	NMEID	21	4	25	2	Qal	21.14	12-3-82	4919	NR	M
* SV9	NMEID	22	4	26	2	Qal	18.57	12-3-82	4922	NR	M
SV10	NMEID	97	4	101	2	QTs	95.21	12-3-82	4911	NR	M
SV11	NMEID	21	4	25	2	Qal	22.19	12-3-82	4921	NR	M
* SV15	NMEID	15	4	19	2	Qal	15.84	9-20-83	4929	NR	M
SV16	NMEID	111.7	4	115.7	2	QTs	106.32	12-3-82	4911	NR	M

gpm = gallons per minute
mn-dy-yr = month-day-year

A = Abandoned
D = Domestic
I = Industrial
M = Monitor
U = Unused

P = Public Supply
Qal = Alluvium
QTs = Santa Fe Group, Undivided
NR = Not Recorded
NMEID = New Mexico Environmental Improvement Division
NGVD = National Geodetic Vertical Datum of 1929

See Figures 3.19 and 3.20 for well location.
See Table 3.5 and Appendix C-1 for water quality data.

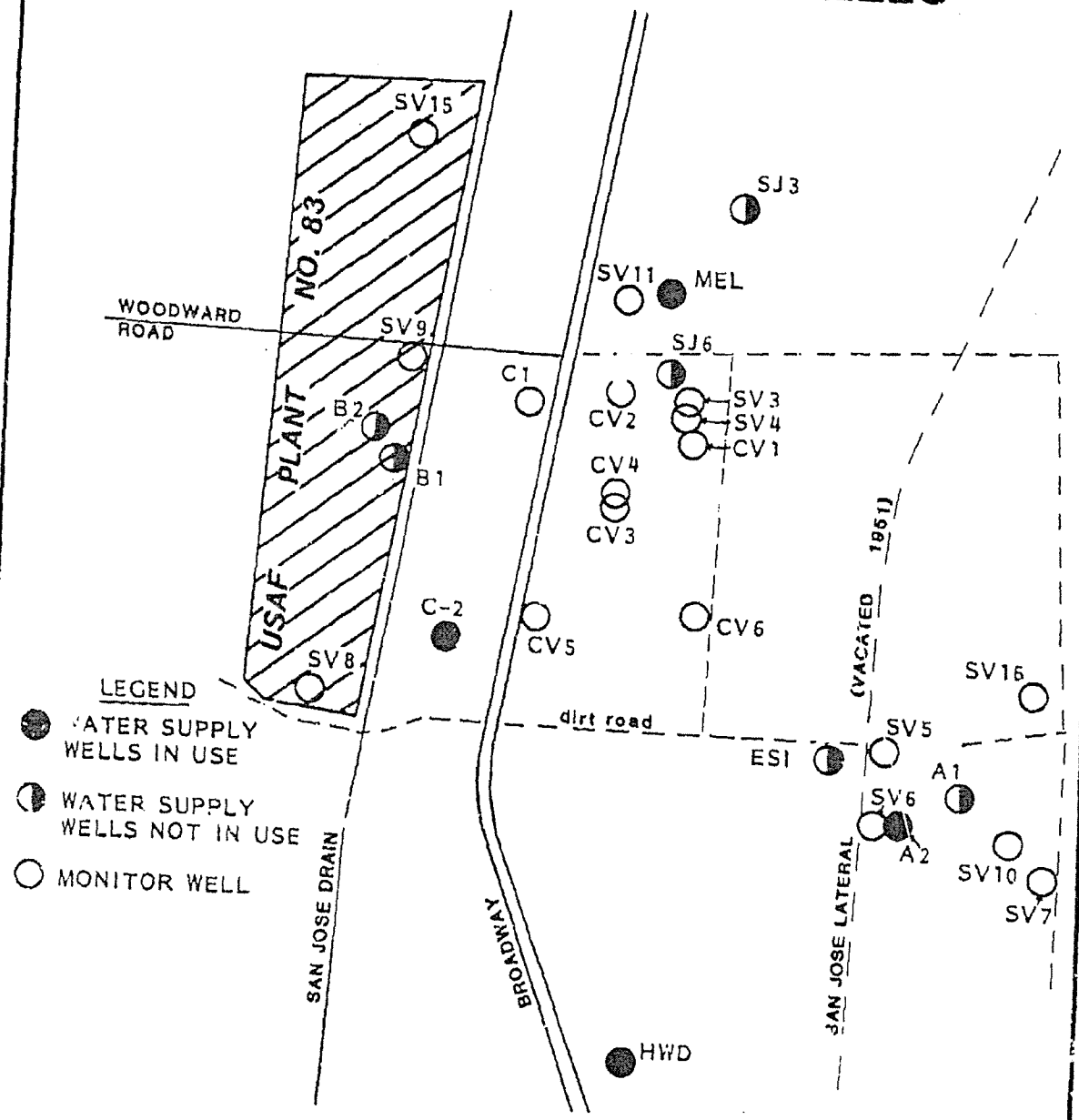
*Wells on USAF Plant No. 83 property

Source: Bynon, 1983, McQuillan, et al., 1982 and Hudson, 1982.

FIGURE 3.20

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT

LOCATION OF WATER WELLS



NOTES: SEE TABLE 3.6 FOR WATER WELL DATA

WELLS SJ3, SJ6, ESI AND A1 ARE TEMPORARILY NOT IN USE DUE TO CONTAMINATION.

WELLS B1 AND B2 WERE ABANDONED AND CAPPED WHEN PLANT NO. 83 BEGAN USING CITY WATER.

SOURCE: McQUILLAN, et al., 1982 AND USAF PLANT NO. 83 DOCUMENTS

ES ENGINEERING-SCIENCE

1. The normal annual precipitation is 7.77 inches; the net precipitation is -54.23 inches and the 1-year, 24-hour rainfall event is estimated to be 1.25 inches. These data indicate that there is little or no potential for precipitation to infiltrate the surface soils on the plant property. Also, there is a slight potential for runoff and erosion.

2. There is limited area on the plant property where natural soils are exposed. Most of the plant property is covered by asphalt or concrete. The natural soils on the property are typically clayey or sandy loam with low permeability values. These data indicate that recharge by precipitation infiltrating the soils will be slow.

3. Surface water in the vicinity of the plant may recharge the shallow water-table aquifer or may flow downstream in the San Jose Drain to the Rio Grande.

4. Clay is a dominant lithologic unit under the plant which may limit the vertical migration of ground water.

5. Alluvial deposits of sand, gravel, cobbles and clay underly the plant. Water levels are approximately 15 to 20 feet below ground within the shallow alluvial deposits.

6. Water levels within the deeper alluvial deposits and the Santa Fe Group (undivided) are approximately 35-50 feet deep. These data indicate that a shallow water-table aquifer exists under the plant and a potential exists for horizontal and vertical migration of ground water from the shallow water-table aquifer to the regional water-table aquifer.

7. Ground-water contamination has been detected in shallow monitoring wells on the plant property.

8. The direction of ground-water flow within the shallow water-table aquifer cannot be determined based on available data.

9. The regional ground-water flow direction is east and northeast from the plant to major water producing wells for the City of Albuquerque.

10. The operation of wells SJ3 and SJ6 may impact the ground-water conditions underlying the plant in both the shallow and regional water-table aquifers.

11. The plant is located in a "declared underground water basin" which is the sole source aquifer for Albuquerque's water supply.

12. There are no Federally- or State-listed endangered or threatened species which inhabit the plant property.

CHAPTER 4

FINDINGS

This section summarizes the hazardous waste generated by activity; describes waste treatment and disposal methods; identifies the storage sites located at the plant; and evaluates the potential for environmental contamination from those sites. A review was conducted of current and past waste generation and management methods in order to identify those activities that resulted in the generation of hazardous waste. This activity involved a review of files and records, interviews with current and former plant employees, and an inspection of the plant site.

The following discussion emphasizes those wastes which have been generated at Air Force Plant No. 83 which are either hazardous or potentially hazardous. In this discussion a hazardous substance is defined either as hazardous by the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) or a potentially hazardous waste, which is suspected of being hazardous although insufficient data are available to fully characterize the waste material. The source of most of the hazardous waste at the plant can be directly associated with the industrial operations and the methods of treatment, storage and disposal of these wastes. No landfills or other disposal sites were found to exist on the plant site. This study included a review of the potential sources of contamination such as chemical spills which occurred at the plant and other supplemental industrial activities such as fuels management, pest management, and heat and power production.

PAST INDUSTRIAL OPERATIONS

The materials manufactured and the levels of production during the 1951 to 1967 period, when American Car and Foundry (ACF) operated the plant for the Atomic Energy Commission (AEC) differed significantly from those manufactured since 1967, when General Electric began operating the

plant for the Air Force. The review of these activites was therefore divided into two sub-sections pertaining to the operations which occurred during these two distinct periods in the plant's history.

Two additional periods of industrial operations are also discussed below. These are the Eidal Manufacturing period (1948 to 1951) and the Dow Chemical period (1967).

Eidal Manufacturing Period - 1948 to 1951

Eidal Manufacturing conducted the first industrial operations on the plant site. Eidal manufactured trailers and other types of heavy equipment. Eidal constructed the first buildings on the site in 1948 (Buildings No. 5 and No. 11). The industrial processes conducted on the site consisted primarily of welding and thus would not have generated any hazardous wastes. In 1951, the property was transferred to the Atomic Energy Commission. Eidal still has a manufacturing operation located on a site adjacent to on the west side of the plant.

American Car and Foundry (ACF) Period - 1951-1967

From 1951 to 1967 the plant was owned by the Atomic Energy Commission and operated by American Car and Foundry as the AEC contractor. The plant was operated primarily to support activities at the Los Alamos Installation. The manufacturing operations included forming, welding plating, and machining metal parts and structures and molding and machining plastics. The plant was divided into seven functional groups: Materials and Process Development, Parts Preparation, Assembly, Plate Shop, Small Machine Weld, Lead Plate Line and Miscellaneous Processing. Table 4.1 identifies the areas of the plant which were occupied by each of these groups, the types and quantities of wastes generated at the various locations and the method of disposal of these wastes throughout the period of operation.

Dow Chemical Period - 1967 (10 months)

Just prior to the Air Force's purchase and GE's subsequent occupation of Plant 83, the Dow Chemical Company joined with ACF in the operation of a portion of the facility for about 6 months. This was done for the purpose of training Dow on how to duplicate ACF's methods and skills so that the same products could be thereafter manufactured by Dow at the AEC's Rocky Flats Plant. Dow was not permitted during this time to institute any changes in the methods, materials, processes or practices being used.

TABLE 4.1

INDUSTRIAL OPERATIONS (Shops)

Waste Management

SHOP NAME	LOCATION (BLDG. NO.)	WASTE MATERIAL	WASTE QUANTITY	METHOD(S) OF TREATMENT, STORAGE & DISPOSAL (1950 – 1980)
ACF PERIOD 1953 - 1967				
MATERIALS AND PROCESS DEVELOPMENT (AREA 512)	5	GOLD SEL-REX	50 GALS./ONE TIME	SOLD TO U.S. MINT 1966
		SILVER CYANIDE, POTASSIUM CYANIDE	30 GALS./ONE TIME	SOLD TO U.S. MINT
		FREON	110 GALS./2 MOS.	1960 – 1967 COMMERCIAL SALE, EVAPORATED
		COOLANT	<20 GALS./MO.	1956 REMOVED WITH RECYCLED SCRAP CHIPS
		SMUT GO (CHROMATE NITRIC ACID SOLUTION)	165 GALS./YR.	NEUTRALIZED TO STORM SEWER 1956
		TURCO-AVIATION (TRISODIUM PHOSPHATES)	125 LBS./YR.	NEUTRALIZED TO STORM SEWER
PARTS PREPARATION (AREA 508)	11	TURCO SMUT GO	300 LBS. & H_2O/6 MOS.	NEUTRALIZED TO STORM SEWER – 1967 – NEUTRALIZED TO SANITARY SEWER
			150 LBS./6 MOS. (SOLIDS)	TO KIRTLAND LANDFILL
	11	TURCO AVIATION	300 LBS. & H_2O/MO.	STORM SEWER – 1956 – DILUTED TO SANITARY SEWER
	11	TRICHLOROETHYLENE	55 GALS./2 WKS.	COMMERCIAL SALE
	5	PENETRANT	150 GALS./YR.	TO KIRTLAND LANDFILL
	5	FIXER	55 GALS./MO.	STORM SEWER – 1956 – SANITARY SEWER

DUST CONTROL - OILS SPREAD ON LOCAL ROADS FOR DUST CONTROL

TABLE 4.1 (cont'd)

INDUSTRIAL OPERATIONS (Shops)

Waste Management

SHOP NAME	LOCATION (BLDG. NO.)	WASTE MATERIAL	WASTE QUANTITY	METHOD(S) OF TREATMENT, STORAGE & DISPOSAL (1950 1960 1970 1980)
PARTS PREPARATION (AREA 504) (CONT'D)	5	EMULSIFIER	100 GALS./YR.	1954 — TO KIRTLAND LANDFILL
	5	DEVELOPER	100 LBS./YR.	STORM SEWER — 1955 — 1957 — SANITARY SEWER
ASSEMBLY (AREA 505)	18a	DOW 17 ANODIZE SANDIA SPEC 400188 (ANODIZING MAGNESIUM)	4000 GALS./ONE TIME	NEUTRALIZED TO SANITARY SEWER
			2000 LBS./ONE TIME (SOLIDS)	TO KIRTLAND LANDFILL
		PHOSPHORIC ACID, CHROMIC ACID, SULFURIC ACID	110 GALS./6 MOS.	1957 — NEUTRALIZED TO SANITARY SEWER
		TURCO AVIATION	1250 LBS. & H_2O/6 MOS.	STORM SEWER — 1956 — 1955 — 1967 — DILUTED TO SANITARY SEWER
		TURCO ARR (ALKALINE RUST REMOVER) (88-95% NaOH)	3 TANKS 1250 LBS. & H_2O/6 MOS. 1000 LBS. & H_2O/6 MOS. 25 LBS. & H_2O/MO.	1956 — NEUTRALIZED TO SANITARY SEWER
		IRON PHOSPHATE	100 GALS. & H_2O/YR.	NEUTRALIZED TO SANITARY SEWER SOLIDS TO KIRTLAND LANDFILL
		CHROMIC ACID RINSE	250 LBS. & H_2O/2 YRS.	NEUTRALIZED TO SANITARY SEWER
		TURCO 4409 (AMMONIUM BIFLUORIDE)	2000 GALS./6 MOS.	NEUTRALIZED TO SANITARY SEWER
		CHROMIC ACID	3000 LBS. & H_2O/2 YRS.	NEUTRALIZED TO SANITARY SEWER
			1000 LBS./2 YRS.	SOLIDS TO KIRTLAND LANDFILL

DUST CONTROL OILS SPREAD ON LOCAL ROADS FOR DUST CONTROL

TABLE 4.1 (cont'd)

INDUSTRIAL OPERATIONS (Shops)

Waste Management

SHOP NAME	LOCATION (BLDG. NO.)	WASTE MATERIAL	WASTE QUANTITY	METHOD(S) OF TREATMENT, STORAGE & DISPOSAL (1950 1960 1970 1980)
ASSEMBLY (AREA 505) (CONT'D)		ALODINE 1200, ALUMIGOLD TRUCO, MIL-L-5541	2000 GALS./2 YRS.	NEUTRALIZED TO STORM SEWER (1955–1956); NEUTRALIZED TO SANITARY SEWER (1956–1967)
			300 LBS./2 YRS. (SOLIDS)	TO KIRTLAND LANDFILL
		PAINT SLUDGE	50 LBS./WK.	TO KIRTLAND LANDFILL
		WATER WASH SPRAY, BOOTH OVERFLOW	50 GALS./DAY	STORM DRAIN (1964); SANITARY SEWER
		LUBE OIL	150-200 GALS./MO.	DUST CONTROL OR SANDIA BURN PIT FOR FIRE TRAINING
		TOLUENE	SMALL RESIDUAL QUANTITIES AND WIPE RAGS	1956 KIRTLAND LANDFILL
		MEK	SMALL RESIDUAL QUANTITIES AND WIPE RAGS	KIRTLAND LANDFILL
PLATE SHOP (AREA 514)	7	DYE SOLUTIONS		
		OLIVE DRAB	2 LBS./MO.	1959 SANITARY SEWER
		YELLOW	2 LBS./MO.	SANITARY SEWER
		NICKEL ACETATE	200 GALS. & H_2O/MO.	NEUTRALIZED TO SANITARY SEWER
		CADMIUM PLATING SOLUTION (CONTAINS CADMIUM AND CYANIDE)	600 GALS.[b]	NEUTRALIZED TO SANITARY SEWER TO HYPOCHLORITE
			300 LBS. (SOLIDS)[b]	TO KIRTLAND LANDFILL

(b) IN 15 YEARS PUMPED ONE TIME AFTER PLATE SHOP FIRE IN 1962.

DUST CONTROL - OILS SPREAD ON LOCAL ROADS FOR DUST CONTROL

TABLE 4.1 (cont'd)

INDUSTRIAL OPERATIONS (Shops)

Waste Management

SHOP NAME	LOCATION (BLDG. NO.)	WASTE MATERIAL	WASTE QUANTITY	METHOD(S) OF TREATMENT, STORAGE & DISPOSAL (1950 1960 1970 1980)
PLATE SHOP (AREA 514) (CONT'D)	7	NICKEL CHLORIDE	10 GALS. & 40 GALS. H_2O/3 WKS.	1959 – 1967 NEUTRALIZED TO SANITARY SEWER
			5 LBS./3 WKS. (SOLIDS)	TO KIRTLAND LANDFILL
		SMUT-GO (CHROMATE/NITRIC ACID SOLUTION)	300 LBS. & H_2O/3 MOS.	NEUTRALIZED TO SANITARY SEWER
			150 LBS./3 MOS. (SOLIDS)	TO KIRTLAND LANDFILL
		TURCO AVIATION	300 LBS. & H_2O/1 MO.	DILUTED TO SANITARY SEWER
		IRON PHOSPHATE (TURCO BRAND)	30 GALS. & H_2O/YR.	NEUTRALIZED TO SANITARY SEWER
			500 LBS./YR. (SOLIDS)	TO KIRTLAND LANDFILL
		CHROMIC ACID	180 LBS. & H_2O/6 MOS.	NEUTRALIZED TO SANITARY SEWER
			250 LBS./6 MOS. (SOLIDS)	TO KIRTLAND LANDFILL
		TURCO 3854 (NaOH SOLUTION)	600 GALS./MO.	NEUTRALIZED TO SANITARY SEWER
		MURATIC ACID	600 GALS./MO.	NEUTRALIZED TO SANITARY SEWER
		IRIDITE #1 (CHROMATE SOLUTION)	600 GALS./6 MOS.	NEUTRALIZED TO SANITARY SEWER
		SULFURIC ACID	600 GALS./3 MOS.	NEUTRALIZED TO SANITARY SEWER
		PERCHLOROETHYLENE	110 GALS./2 WKS.	COMMERCIAL SALE AND CONTRACT DISPOSAL

TABLE 4.1 (cont'd)

INDUSTRIAL OPERATIONS (Shops)

Waste Management

SHOP NAME	LOCATION (BLDG. NO.)	WASTE MATERIAL	WASTE QUANTITY	METHOD(S) OF TREATMENT, STORAGE & DISPOSAL (1950 1960 1970 1980)
SMALL MACHINE WELD (AREA 515)	14c	TURCO ARR	125 LBS. & H_2O/MO.	1963 NEUTRALIZED TO SANITARY SEWER
		NITRIC ACID	150 GALS. & H_2O/MO.	NEUTRALIZED TO SANITARY SEWER
		NITRADD HNO_3	300 GALS./MO.	NEUTRALIZED TO SANITARY SEWER
		1,1,1, TRICHLOROETHANE	110 GALS./2 WKS.	COMMERCIAL SALE
		PENETRANT	100 GALS./YR.	1959 TO KIRTLAND LANDFILL
		EMULSIFIER	25 GALS./YR.	TO KIRTLAND LANDFILL
		FIXER	70 GALS./WK.	SANITARY SEWER
		DEVELOPER	50 GALS./WK.	SANITARY SEWER 1967
LEAD PLATE LINE	21a	LEAD FLUOROBORATE, CYANIDE COPPER PLATE, ALUMINUM-D	NO DISCHARGE ALL WASTES GIVEN TO A PLATING COMPANY WHEN PROJECT FINISHED.	1964 RECYCLED
MISCELLANEOUS PROCESSING (AREA 506)	14a	TURCO AVIATION	2000 GALS./2 MOS.	1956 DILUTED TO SANITARY SEWER
		TURCO SOLUTION (CONTAINS TCE)	WIPE CLOTHS	TO KIRTLAND LANDFILL
		COOLANT	55 GALS./2 MOS.	DUST CONTROL 1967

DUST CONTROL - OILS SPREAD ON LOCAL ROADS FOR DUST CONTROL

General Electric (GE) Period - 1967 to Present

In 1967, the Air Force acquired ownership of the plant and contracted with General Electric to manufacture aircraft engine parts, sub-assemblies and spare parts for the military. GE also manufactures commercial jet engine sub-assemblies. The types of operations conducted at the plant included machinery, fiber laminate composition, investment casting and shrouds and seals manufacturing. General Electric organized the plant into seven operational groups. They included Composites Component Operations (plastics), Composites Program, Metals Manufacturing, Investment Casting, Production and Inventory Control, Turbine Shrouds and Seals and Miscellaneous Shops (e.g. plant maintenance). Table 4.2 identifies the areas of the plant which have been occupied by each of these groups, the types and quantities of wastes generated at the various locations and the method of disposal of these wastes throughout the period of operation.

SUMMARY OF WASTE MANAGEMENT PRACTICES

Despite the difference in the products manufactured during the two major periods of the plant's history, the major industrial processes were quite similar. Therefore, even though the specific wastes and the quantities generated varied, the major categories of waste were the same throughout the life of the plant.

During the early 1950's until 1954 the liquid industrial wastes were typically discharged to the San Jose Drainage Ditch and the solids were disposed of within the Kirtland AFB landfill. It should be noted that the operations at the plant were not extensive and because of this fact, only small quantities of waste were generated during this period. In 1954, the AEC began to expand the plant facilities as the operations became more extensive. As new buildings were constructed, process and sanitary drains were linked to a tributary sewer line connected to the city sewage treatment plant. Most non-combustible wastes were discharged to the Albuquerque sewer system. The acid and caustic solutions were typically neutralized prior to their discharge. Oils were disposed of in one of two manners. Either they were transported to the nearby Sandia Base burn pit and burned during fire protection training exercises or they were sprayed over adjacent dirt roads for

TABLE 4.2

INDUSTRIAL OPERATIONS (Shops)

Waste Management

SHOP NAME	LOCATION (BLDG. NO.) PRESENT	LOCATION (BLDG. NO.) PAST	WASTE MATERIAL	WASTE QUANTITY	METHOD(S) OF TREATMENT, STORAGE & DISPOSAL (1950 1960 1970 1980)
GE PERIOD 1967 - PRESENT					
COMPOSITES COMPONENT OPERATIONS (PLASTICS)	14d		1,1,1, TRICHLOROETHANE	50 GALS./2 WKS.	1967 CONTRACT RECYCLE 1975 COMMERCIAL SALE
	14c		ALKALINE CLEANERS	80 GALS./6 MOS.	SANITARY SEWER / SANITARY SEWER OR CONTRACT DISPOSAL
			CHROME ETCH	80 GALS./2 YRS.	NEUT. TO SANITARY SEWER / CONTRACT DISPOSAL 1975
	14c		ADIPRENE	3 GALS./MO.	LANDFILL / CONTRACT DISPOSAL
	14c		MS 123 (FREON BASE)	100 GALS./YR.	CONTRACT RECYCLE 1982 CONTRACT DISPOSAL
	14c		CAYTUR 21 (METHYLENE DEANALINE)	<5 GALS./YR.	SANITARY SEWER
	14c		PASAGEL	<5 GALS./YR.	SANITARY SEWER
	14c		PAINT BR127 (CONTAINS MEK & ORGANIC CHROMATE)	10 GALS./WK. (40 GALS./WK. PRIOR TO MID 1970's)	COUNTY LANDFILL / CONTRACT DISPOSAL 1975
COMPOSITES PROGRAM	14c		GRAPHITE PMR-15		COUNTY LANDFILL 1981
			1,1,1-TRICHLOROETHANE	5 GALS./MO.	COMMERCIAL SALE
			PASAGEL	5 GALS./YR.	SANITARY SEWER
METALS MANUFACTURING	14cc	6,7	WASTE CUTTING OIL		
	14bb		SIMCOOL (1968 - 1976)	200 GALS./WK.	1967 DUST CONTROL 1975
	14, 10 14a, 14b 14c		TRIMSOL (1976 - PRESENT)	3,400 GALS./3 WK. (90% H_2O)	CONTRACT DISPOSAL 1979 1980 1975 DUST CONTROL CONTRACT DISPOSAL

SAN. SEWER - SANITARY SEWER

NEUT. - NEUTRALIZED

DUST CONTROL - OILS SPREAD ON GROUND AND ROADS FOR DUST CONTROL

TABLE 4.2 (cont'd)

INDUSTRIAL OPERATIONS (Shops)

Waste Management

SHOP NAME	LOCATION (BLDG. NO.) PRESENT	LOCATION (BLDG. NO.) PAST	WASTE MATERIAL	WASTE QUANTITY	METHOD(S) OF TREATMENT, STORAGE & DISPOSAL (1950, 1960, 1970, 1980)
METALS MANUFACTURING (CONT'D)	14a	6,7	ALKALINE CLEANERS	3,000 GALS./YR.	NEUT. TO SAN. SEWER (1975, 1980); CONTRACT DISPOSAL FOR CHROME CONTAMINATED SOLUTIONS
	14a	6,7	CHROME ETCH	4,000 GALS./YR.	NEUT. TO SAN. SEWER; CONTRACT DISPOSAL
	14a	6,7	CHROME SEAL	7,500 GALS./2 YRS.	NEUT. TO SAN. SEWER; CONTRACT DISPOSAL
	14a	6,7	SULFURIC ACID	1,200 GALS./4 YRS.	NEUT. TO SAN. SEWER; CONTRACT DISPOSAL
	14a	6,7	NICKEL PLATING SOLUTION	80 GALS./YR.	NEUT. TO SAN. SEWER; CONTRACT DISPOSAL
		6,7		100 GALS./YR.	NEUT. TO SAN. SEWER (1977); CONTRACT DISPOSAL (1975)
	14a	6,7	NITRIC ACID NITRADD	800 GALS./2 YRS.	NEUT. TO SAN. SEWER; CONTRACT DISPOSAL
	14cc, 14bb, 14, 10, 14a, 14b, 14c	6,7	1,1,1-TRICHLOROETHANE	150 GALS./MO.	CONTRACT RECYCLE (1976); COMMERCIAL SALE
		14b, 14c, 14bb, 14cc	TURCO SOLVE 66 (CONTAINS TCE)	100 GALS./MO.	CONTRACT RECYCLE; CONTRACT DISPOSAL (1975)
	14cc, 14bb, 14, 10, 14a, 14b, 14c	6,7	MISCELLANEOUS LUBRICATING OIL	200 GALS./WK.	DUST CONTROL; CONTRACT DISPOSAL
	14a		PAINTS AND PAINT SLUDGE (CONTAINS TOLULENE & MEK)	15 GALS./WK.	COUNTY LANDFILL; CONTRACT DISPOSAL

SAN. SEWER - SANITARY SEWER

NEUT. - NEUTRALIZED

DUST CONTROL - OILS SPREAD ON GROUND AND ROADS FOR DUST CONTROL

TABLE 4.2 (cont'd)

INDUSTRIAL OPERATIONS (Shops)

Waste Management

SHOP NAME	LOCATION (BLDG. NO.) PRESENT	LOCATION (BLDG. NO.) PAST	WASTE MATERIAL	WASTE QUANTITY	METHOD(S) OF TREATMENT, STORAGE & DISPOSAL (1950 1960 1970 1980)
METALS MANUFACTURING (CONT'D)	14a		EDM OIL	100 GALS./YR.	DUST CONTROL; 1975 CONTRACT DISPOSAL
			CONTAMINATED OIL FILTERS	6/MO.	COUNTY LANDFILL
	22		CONDENSATE WITH OIL CONTAMINANTS	75 GALS./DAY	GREASE TRAP TO STORM SEWER
			GREASE AND OIL	20 LBS./6 MOS.	COUNTY LANDFILL
	14a	7	NICKEL ACETATE SEAL SOLUTION (CONTAINS NICKEL AND COBALT)	800 GALS./2 YRS. (PRIOR TO 1981 160 GALS.)	CONTRACT DISPOSAL
	14a	7	ORGANIC BLACK DYE	2,000 GALS./3 YRS. (PRIOR TO 1980 540 GALS.)	1975 CONTRACT DISPOSAL
	14a	7	ALUMINUM DEOXIDIZER (CONTAINS CHROMIUM)	800 GALS./5 YRS. (PRIOR TO 1978 540 GALS.)	CONTRACT DISPOSAL
	14a	7	CHROMATE CONVERSION	800 GALS./2 YRS. (PRIOR TO 1981 540 GALS.)	CONTRACT DISPOSAL
	12		FERRIC CHLORIDE	75 GALS./WK.	CONTRACT DISPOSAL
INVESTMENT CASTING	21b 21a		WAX	800 - 900 LBS./WK.	COUNTY LANDFILL
	21		(NOTE: YATES WAX WAS USED BETWEEN 1974 & 1975 CONTAINING 40% PCB FILLER)	11,000 LBS./ONCE	6,000 lb to COUNTY LANDFILL; 5,000 lb to CONTRACT DISPOSAL
	5	21a	CAUSTIC (POTASH)	500 GALS./WK.	SANITARY SEWER; 1975 SANITARY SEWER / CONTRACT DISPOSAL
	21d			900 GALS./2 MOS.	CONTRACT DISPOSAL
	14a			3,600 GALS./YR.	CONTRACT DISPOSAL

SAN. SEWER - SANITARY SEWER

DUST CONTROL - OILS SPREAD ON GROUND AND ROADS FOR DUST CONTROL

TABLE 4.2 (cont'd)

INDUSTRIAL OPERATIONS (Shops)

Waste Management

SHOP NAME	LOCATION (BLDG. NO.) PRESENT	LOCATION (BLDG. NO.) PAST	WASTE MATERIAL	WASTE QUANTITY	METHOD(S) OF TREATMENT, STORAGE & DISPOSAL (1950 1960 1970 1980)
INVESTMENT CASTING (CONT'D)	21c	21a	1,1,1 TRICHLOROETHANE	150 GALS./MO.	CONTRACT RECYCLE; 77 COMMERCIAL SALE
	21a		1,1,1, TRICHLOROETHANE	50 GALS./MO.	CONTRACT RECYCLE; COMMERCIAL SALE
	21a		FREON TF	150 GALS./WK.	CONTRACT DISPOSAL; 82; RECYCLED
		21a	METHANOL	75 GALS./WK.	DUST CONTROL; 77
	21a		METALS DUST	200 LBS./MO.	COUNTY LANDFILL; 76 COMMERCIAL SALE
PRODUCTION AND INVENTORY CONTROL	18A,B		OUT OF DATE PAINTS	100 GALS./YR.	CONTRACT DISPOSAL AND COUNTY LANDFILL; 75 CONTRACT DISPOSAL
TURBINE SHROUDS AND SEALS	21d	11	SODIUM NITRATE WITH CHROMATE	500 GALS./WK.	SEWER SANITARY; CONTRACT DISPOSAL
			EDM OIL	200 GALS./YR.	RECYCLED, CONTRACT DISPOSAL OF CONTAMINATED OILS
			CONTAMINATED OIL FILTERS	75/WK.	COUNTY LANDFILL
MISCELLANEOUS SHOPS					
AIR COMPRESSOR	9		BLOWDOWN (OIL & WATER)	2 GALS./DAY	DRAINS TO GROUND SURFACE (ABSORBANT MATERIAL TO LANDFILL)
QUALITY CONTROL					
NON DESTRUCTIVE TESTING (NDT)	11 18D	21	PENETRANT	500 GALS./YR.	DUST CONTROL; CONTRACT DISPOSAL
			EMULSIFIER	100 GALS./YR.	DUST CONTROL; CONTRACT DISPOSAL

DUST CONTROL - OILS SPREAD ON GROUND AND ROADS FOR DUST CONTROL

TABLE 4.2 (cont'd)

INDUSTRIAL OPERATIONS (Shops)

Waste Management

SHOP NAME	LOCATION (BLDG. NO.) PRESENT	LOCATION (BLDG. NO.) PAST	WASTE MATERIAL	WASTE QUANTITY	METHOD(S) OF TREATMENT, STORAGE & DISPOSAL (1950 – 1980)
QUALITY CONTROL (CONT'D)					
NON-DESTRUCTIVE TESTING (NDT) (CONT'D)			1, 1, 1-TRICHOLROETHANE	100 GALS./YR.	COMMERCIAL SALE AND CONTRACT DISPOSAL; DISPOSAL BY CONTRACT; CONTRACT DISPOSAL
			FIXER SOLUTION	80 GALS./WK. (PRIOR TO MID 1970's 150 GALS./WK.	SAN. SEWER, NO SILVER RECOVERY; CONTRACT DISPOSAL FOR SILVER RECOVERY
			DEVELOPER	60 GALS./WK.	SANITARY SEWER
			FLUORESCENT PHOSPHOR	20 LBS./YR.	SANITARY SEWER
CHEMICAL TESTING LABORATORIES	Yes		MISCELLANEOUS CHEMICAL WASTES	SMALL QUANTITIES	SANITARY SEWER; CONTRACT DISPOSAL

SAN. SEWER - SANITARY SEWER

dust control. Solvents were handled in one of several manners. The majority of the solvents were collected in drums and stored until enough had been accumulated to warrant a contract for its sale or disposal. Some solvents were also known to have been combined with the waste oils and either burned in the fire training pit or sprayed with the oil for dust control. Solid wastes (both hazardous and non-hazardous) were taken to the Kirtland AFB landfill and county landfill (also located on Kirtland AFB property). Some general refuse was incinerated on-site between 1955 and 1962.

In 1967, when the ownership of the plant was transferred to the Air Force, many of the disposal methods were modified. Acids and caustics continued to be neutralized and discharged to the sewers. Oils were stored in tanks on the south end of the plant. The tanks were periodically pumped into a truck which hauled the waste to the nearby Police Honor Farm where the oily waste was sprayed over the roads for dust control. Solvents were handled in manners similar to those of the ACF period. The majority of the solvents were stored in drums until a large enough quantity was accumulated to warrant a disposal or a contract for recycling the waste. Some solvents were combined with the waste oils and sprayed on the roads for dust control. The solid hazardous and non-hazardous wastes continued to be disposed of in the Kirtland and county landfills. Beginning around 1975 the plant began to arrange for contractors to pick up and dispose of the oils as well as the hazardous wastes generated at the facility.

HAZARDOUS WASTE STORAGE AREAS

Seven major hazardous waste storage areas have existed at Plant No. 83 (Figure 4.1). Only three of these sites are still in use. The seven sites are discussed below.

Hazardous Waste Storage No. 1

The area designated Hazardous Waste Storage No. 1 has been used as a chemical waste storage area since approximately 1954. The site was used primarily as a storage point for waste oils, coolants and some solvents used in the process areas. The area houses several tanks situated on a concrete slab. These include two 1300-gallon fiberglass open topped tanks (referred to as "swimming pool tanks"), and a

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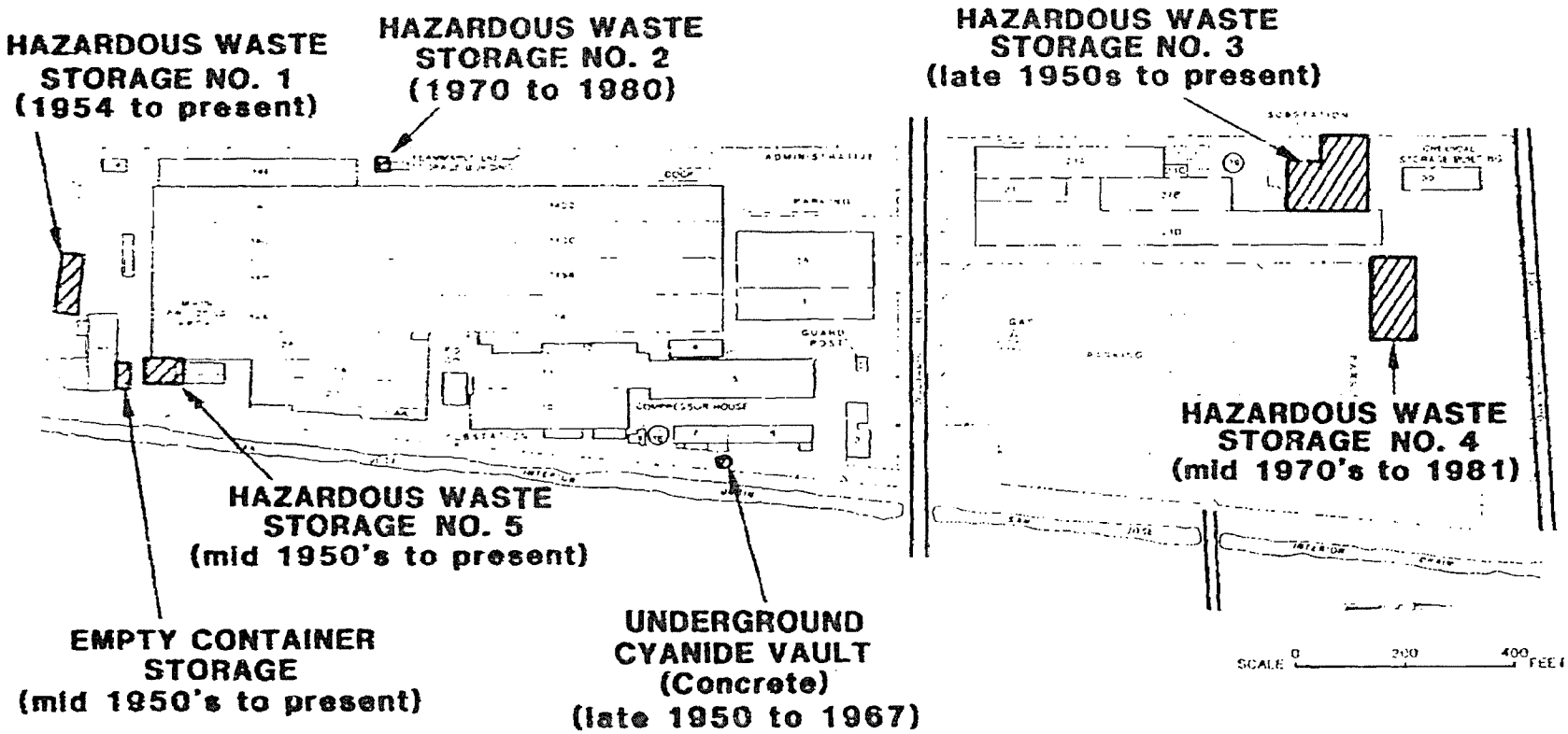
HAZARDOUS WASTE STORAGE AREAS



SOURCE: USAF PLANT NO. 83 DOCUMENTS

FIGURE 4.1

3400-gallon rectangular steel box (referred to as the "green tank"). Waste oils and coolants have been the principal products stored in the area. The coolant, known as Trimsol, is a water based lubricant used in cutting and grinding machines. A recent analysis of the waste Trimsol detected 37 mg/l of carbon tetrachloride and 2 mg/l of 1,1-dichloroethylene (refer to listing of data in Appendix C-3). Other contaminants previously reported to have been detected in the waste Trimsol include methylene chloride and 1,1,1 trichloroethane.

Until August 1983, waste coolant had been stored in the two 1300-gallon "swimming pool" tanks. In that month, the marginal condition of the tanks required relocation of waste Trimsol storage to the "Green Tank". When the two "swimming pool" tanks were deactivated, the waste coolant (Trimsol) was pumped out of the tank with a vacuum tanker truck and removed for off-site disposal at an approved disposal location. Sludge which had accumulated at the bottom of the tank was shoveled into barrels. The barrels were removed as hazardous waste by contract. The tanks were steam cleaned, allowed to dry, and then covered with polyethelene to prevent accumulation of rainwater in them. The concrete containment basin surrounding the Trimsol tanks was also steam cleaned and the wastewater generated was pumped into a small pump truck and placed into the green waste oil storage tank to await removal as a hazardous waste.

Spillage in the area in and around Hazardous Waste Storage No. 1 was evident from the oily coloration on the concrete and asphalt pads in the vicinity. However, no large scale spills were known to have occurred at this site. Some of the oily coloration in the storage area may be attributed to particular design features at the storage facility. An asphalt lot directly north of the site has been used as a storage area for bins containing the metal turnings generated during various machining processes. These metal turnings are typically coated with Trimsol. The coolant has a tendency to drip to the asphalt pad beneath the bins. Runoff from this area is currently directed to a concrete containment pit surrounding the "swimming pool" tanks and periodically pumped into the green waste oil storage tank. During the recent site visit, the concrete containment pit was observed to contain several inches of rainfall runoff with a layer of suspected tramp oil floating on the surface.

Hazardous Waste Storage No. 2

Hazardous Waste Storage No. 2 is located at the south end of Building 27 which is designated the flammable liquids storage building. Since approximately 1970, this section of the building was used to store spent solvents such as MEK and 1,1,1-trichloroethane. No spills were observed or known to have occurred in the area. The building is still used for storage of some flammable materials; however, waste chemicals have not been stored at this site since the early 1980's.

Hazardous Waste Storage No. 3

Hazardous Waste Storage No. 3 has been an active storage area for waste chemicals since the late 1950's. The area is located just south of Building 30 and west of Building 21D. Presently, the yard is separated into seven segregated areas: flammable waste, caustic waste, oxidize waste, acid waste, 1,1,1 trichloroethane storage, Freon TF storage, other waste storage and empty container storage. Bags of cement are placed around the perimeter of each section to provide containment in the event of spills. The storage area is outside and has a hard-packed dirt base recently covered with approximately six inches of sand. The surface of the ground beneath the sand cover was reported to have been noticably discolored. The discoloration may have been the result of occasional leakage from the containers in storage or possibly from a previous program of spraying exposed earth areas with waste oil to reduce fugitive dust.

Waste chemicals which have been stored within this area have included (Source: GE Closure Plan, August 1983):

- 45% Potassium hydroxide solution
- 22% Potassium hydroxide solution
- BR-127 adhesive primer
- Alumitech No. 2
- 1,1,1-Trichloroethane
- Ferric chloride solution
- Inorganic alkaline cleaner solution
- Chrome seal
- Alkaline cleaner solution
- Anocut electolyte solution

- Freon TF (Trichlorotrifluoroethane)
- Waste Paints
- Nitric nitradd nickel etch waste
- Phosphoric acid etch waste
- Sulfuric acid etch waste

Two sets of soil analyses were performed in this area, the first in March 1982 and the second in June 1982 (see Appendix C-2 for sampling locations and soil test results). Both were tested for lead and total hydrocarbons. The first samples were taken near an underground leaded gasoline tank that was removed in 1981 to accomodate plant modification. Five core samples were taken. One core, Sample #1, was not analyzed. The remaining four extended roughly linearly from the tank east into areas which are now Building 21D, a roadway between Building 21D and the North Parking Lot (see Figure C.1 in Appendix C). All of the lead values were below 15 micrograms per gram (ug/g), and all of the hydrocarbons were non-detectable except one which was 191 ug/g in Sample Location #5. The exact cause of the hydrocarbon levels found in Sample #5 is unknown.

The lead levels were above 5 ug/g at sample locations nos. 2, 4 and 5 (NMEID may consider 5 ppm the decontamination criteria), however, the lead in the soil at the sites close to the gas tank is not thought to be due to the underground storage tank. The tank was pressure tested after it was removed from the ground and was certified to be non-leaking. The lead levels may have resulted from the storage of lead turnings reported to have been stored in the area designated Hazardous Waste Storage Area No. 3 during the ACF period prior to 1967 (Source: GE Closure Plan, August 1983).

In the second set of soil samples, two were taken at the eastern boundary of the Hazardous Waste Storage No. 3 adjacent to Building 21D. In addition, three samples were taken to the east of substation (see Figure C.2 in Appendix C). Of the five samples in the area (the sixth was a control outside the plant boundaries), lead values ranged from 25-168 ug/g. Hydrocarbon values ranged from 279-691 ug/l. Again, the exact cause of the hydrocarbon levels found is unknown (source: GE Closure Plan, August 1983).

Hazardous Waste Storage No. 4

Hazardous Waste Storage No. 4 is an area located just east of Building 30 (Chemical Storage Building, located on the north end of the site) in an area which is now an asphalt parking lot. The asphalt cover was not in place at the time the site was used as a waste chemical storage area. Between the mid 1970's and 1981, drums of waste freon and waste 1,1,1 trichloroethane were accumulated in this location. As many as 120 drums of waste were estimated to have been stored on the lot. These chemicals were removed for disposal by a contractor in 1981. It was reported that some small leaks may have occurred while the drums were in storage.

Waste Storage Area No. 5 and Empty Container Storage

Waste Storage Area No. 5 and the Empty Container Storage area have been used since the mid 1950's. The two areas are adjacent to one another between Building Nos. 28 and 22 on the south end of the plant site. The waste storage area was used as a collection point for the plant's general refuse and the empty container storage area was used to temporarily store empty drums until they were reused to contain waste chemicals. Some chemical wastes were stored periodically in both areas; consequently, there is a likelihood that minor leakage of chemical waste and oils may have occurred on the asphalt-covered area. Since the area has been covered with asphalt throughout the period it has been used as a storage area, the potential for soil or ground-water contamination occurring as a result of any spills is greatly reduced. However, some minor surface water contamination in the San Jose Drainage Ditch may have occurred as a result of the surface water runoff from the area. These sites are still serving as storage areas for the designated materials.

Underground Cyanide Vault

An underground concrete vault was installed during the late 1950's on the southeast corner of Building No. 6. The purpose of this vault was to collect any spillage which may have resulted from the plating vats which were located in Building No. 6. Cyanide solutions were the primary contaminant which the vault was intended to trap. The concrete vault was described as having dimensions of 3'X3'X4'. The vault is capped with a steel cover having the word "Cyanide" welded on the

surface. There were no outlets associated with the vault. The interviews conducted during the site investigation revealed conflicting stories as to whether or not any cyanide wastes entered the vault. An attempt to locate the vault revealed that the area had been covered with asphalt and therefore, an inspection of the vault could not be accomplished during the on-site investigation.

SPILLS

Chemical spills which had the potential for contaminating the environment were only known to have occurred in three areas other than the hazardous waste storage areas previously discussed. The three isolated spill areas are depicted in Figure 4.2. Two of the spills occurred in the chemical storage area adjacent to Building 30. One spill involved the rupturing of a 55-gallon drum of 1,1,1 trichloroethane. The spill occurred late in 1982 and was immediately cleaned up. The second spill involved the loss of between 200 and 250 gallons of a caustic cleaner. This spill occurred in 1981 and was also promptly cleaned up. Other small leaks from storage containers were known to have periodically occurred in and around the material storage area. The third isolated spill occurred in 1981 or the east side of Building No. 5. The spill included approximately 55 gallons of pottasium hydroxide which overflowed from a concrete vat. The chemical flowed over a concrete drive and some portion of the chemical entered a storm drain. It was estimated tht approximately 10 gallons of the caustic material was discharged to the San Jose ditch. The chemical was immediately neutralized in the ditch with phosphoric acid to meet the New Mexico water quality standards. No long term contamination is expected to have resulted from any of these isolated spills due to the small quantities included and the clean up efforts immediately instituted.

The plant has several PCB transformers and capacitors located throughout the complex. Several small leaks have occurred over the years. All of the leaks have been contained and cleaned up. There are no indications of PCB's having been omitted to the environment from the plant.

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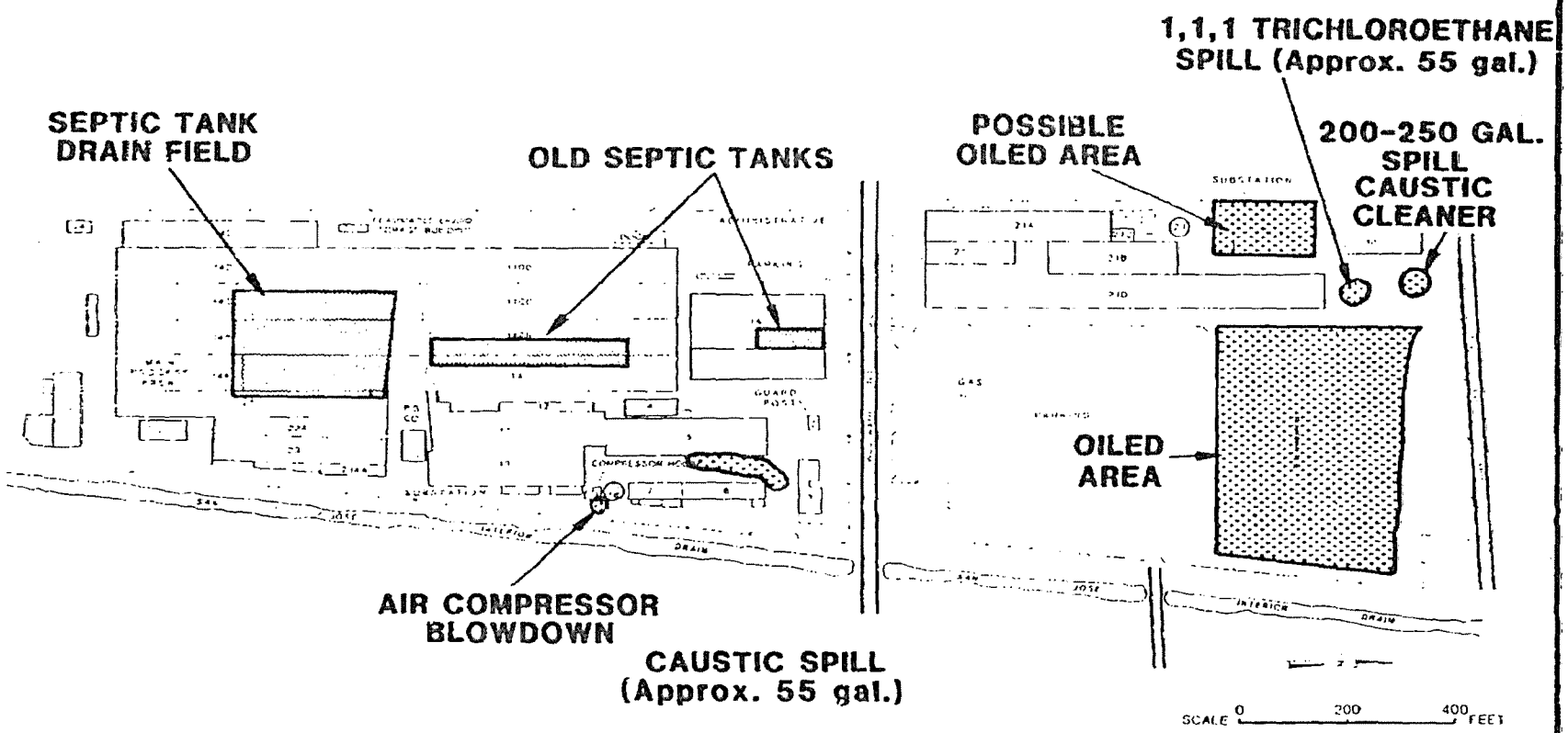
SPILL AND WASTE DISCHARGE SITES



SOURCE: USAF PLANT NO. 83 DOCUMENTS

FIGURE 4.2

DISCHARGE AREAS

Three discharge areas have been identified at the plant site. The earliest of these waste discharge areas was the San Jose Drain. During the early ACF period (1952-1955), prior to the plant's connection to the city sewer system, many of the industrial wastes were allowed to discharge directly into the San Jose Drain through direct outfalls from the process areas. Since the activity level at the plant was very low prior to the expansion which began in the mid 1950's, only small quantities of industrial wastes were directly discharged to the San Jose Drain. Typical of the types of wastes which were known to have been released into the ditch included plating solutions, etching solutions, acids, caustic cleaners and various solvents. Many of the acid and caustic solutions were neutralized prior to their discharge. After the connection to the city sewer system was completed, most discharging of chemical waste directly to the drain ceased. In recent years, many of the old outfall lines have been plugged to prevent any accidental discharges into the drain. Surface runoff from the plant site is however, still discharged to the drain via storm drain outfalls.

During the years preceding the city sewer connection, sanitary wastes were treated in septic tanks and leached to the ground in a drain field located on the site which now supports Buildings 14a, 14b and 14c (Figure 4.2). No contamination is expected to have occurred as a result of these septic tanks. Since approximately 1955, all sanitary wastes have been discharged to the City of Albuquerque sewage treatment plant.

Between 1979 and 1980, waste oil consisting of spent Trimsol and miscellaneous lubricating oils were sprayed over the North Parking Lot and possibly parts of Hazardous Waste Storage No. 3. The intent of the oil discharge was to control fugitive dust on the plant site. It was reported that approximately six applications of oil occurred during the one-year period. An analysis of a soil sample collected from the parking lot only detected trace concentrations of various metals and no organic contaminants (see Appendix C-3 for complete listing of data). An organic scan was also conducted on a sample of waste Trimsol which was the primary constituent of the oil sprayed on the parking lot. The results of this analysis revealed only two organic contaimants; carbon

tetrachloride (37 mg/l) and 1,1 dichloroethylene (2 mg/l) (see Appendix C-3 for complete listing of data).

A third discharge area still in use at the plant is located adjacent to the compressor house (Building No. 9, Figure 4.2). The discharge area consists of a minor amount (less than 1 gallon/week) of oil discharged with the compressor blowdown. The blowdown is presently discharged onto an absorbent material where the oil and water is trapped. The absorbent material is periodically disposed of with the general refuse.

SUPPLEMENTAL INDUSTRIAL ACTIVITIES

Fuels Management

An underground gasoline storage tank (leaded gasoline) was located on the north side of Building 21D. The tank was installed during the early 1960's and deactivated and removed from the ground in 1981. The tank was pressure tested after it was removed from the ground and was certified to be non-leaking. In 1971 a 3,500-gallon above ground gasoline storage tank was installed adjacent to Building 24. No leaks or spills are reported to have occurred around the new tank.

Pest Management

Pest management around the plant site has been performed under a contract by outside vendors. The vendor is responsible for cleaning equipment and discarding empty containers off plant property. No pesticide spills are known to have occurred on the plant site.

Heat and Power Production

The plant is heated by natural gas, therefore, no fuel storage tanks are required and no waste products are generated in heating the plant. The plant's electric power is purchased from the regional power company.

EVALUATION OF PAST DISPOSAL ACTIVITIES AND FACILITIES

The review of past operation and maintenance functions and past waste management practices at Air Force Plant No. 83 has resulted in the identification of 13 sites which were initially considered as areas of concern with regard to the potential for contamination, as well as the potential for the migration of contaminants. These sites were evaluated

using the Decision Tree Methodology referred to in Figure 1.1. Those sites which were considered as not having a potential for contamination were deleted from further consideration. Those sites which were considered as having a potential for the occurrence of contamination and migration of contaminants were further evaluated using the Hazard Assessment Rating Methodology (HARM). Table 4.3 identifies the decision tree logic used for each of the areas of initial concern.

Based on the decision tree logic, 8 of the 13 sites originally reviewed were not considered to warrant evaluation using the Hazard Assessment Rating Methodology. The rationale for omitting these eight sites from HARM evaluation is discussed below:

Hazardous Waste Storage Area No. 2 -	No spills known to have occurred at the site.
Hazardous Waste Storage Area No. 5 -	Only minor spills suspected, area is underlain by asphalt.
Empty Container Storage -	Only minor spills suspected, area is underlain by asphalt.
Septic Tank Drain Field -	Drain field only received sanitary wastes.
Air Compressor Blowdown -	Oil discharge (<1 gallon/wk) contained and properly disposed.
1,1,1 Trichloroethane Spill -	Small spill (approx. 55-gallon), contained and immediately cleaned up.
Caustic Cleaner Spill -	Small spill, (200-250 gallons) contained and cleaned up.
Caustic Spill -	Small spill (approx. 55-gallons), neutralized.

The remaining five sites identified in Table 4.3 were evaluated using the Hazard Assessment Rating Methodology. The HARM process takes into account characteristics of potential receptors, waste characteristics, pathways for migration, and specific characteristics of the site related to waste management practices. The details of the rating procedures are presented in Appendix E. Results of the assessment for the sites are summarized in Table 4.4. The HARM system is designed to

TABLE 4.3
SUMMARY OF DECISION TREE LOGIC FOR AREAS OF INITIAL ENVIRONMENTAL CONCERN AT AIR FORCE PLANT NO. 83

Site Description	Potential for Contamination	Potential for Contaminant Migration	HARM Rating
Hazardous Waste Storage No. 1	Yes	Yes	Yes
Hazardous Waste Storage No. 2	No	No	No
Hazardous Waste Storage No. 3	Yes	Yes	Yes
Hazardous Waste Storage No. 4	Yes	Yes	Yes
Hazardous Waste Storage No. 5	Yes	Yes	No
Empty Container Storage	Yes	No	No
Underground Cyanide Vault	Yes	Yes	Yes
Septic Tank Drain Field	No	No	No
Air Compressor Blowdown	Yes	No	No
1,1,1 Trichloroethane Spill	Yes	No	No
Caustic Cleaner Spill	Yes	No	No
Caustic Spill	Yes	No	No
North Parking Lot (Oiled Area)	Yes	Yes	Yes

indicate the relative need for follow-on action. The information presented in Table 4.4 is intended for assigning priorities for further evaluation of the Air Force Plant No. 83 waste storage areas (Chapter 5, Conclusions, and Chapter 6, Recommendations). The rating forms for the individual waste storage sites at Air Force Plant No. 83 are presented in Appendix F. Photographs of some of the key disposal sites are included in Appendix D.

TABLE 4.5

SUMMARY OF HARM SCORES FOR POTENTIAL CONTAMINATION SOURCES

Rank	Site Name	Receptor Subscore	Waste Character-ization Subscore	Pathways Subscore	Waste Management Factor	Overall Total Score
1	North Parking Lot	80	80	41	.95	64
2	Hazardous Waste Storage No. 1	80	60	46	1.0	62
3	Hazardous Waste Storage No. 3	80	60	41	1.0	60
4	Hazardous Waste Storage No. 4	80	50	41	.95	54
5	Underground Cyanide Vault	80	40	41	0.10	51

CHAPTER 5

CONCLUSIONS

The goal of the IRP Phase I study is to identify sites where there is potential for environmental contamination resulting from past waste disposal practices and to assess the probability of contaminant migration from these sites. The conclusions given below are based on field inspections, review of records and files, review of the environmental setting, and interviews with plant personnel, past employees, and state government employees. Table 5.1 contains a list of the potential contamination sources identified at Air Force Plant No. 83 and a summary of the HARM scores for those sites. Additional sites originally considered as potential contamination sources did not have sufficient data to warrant further consideration and were not evaluated using the HARM system. Information pertaining to those sites listed on Table 5.1 is summarized below and the follow-on recommendations are presented in Chapter 6.

NORTH PARKING LOT

There is sufficient evidence that the North Parking Lot site has potential for creating environmental contamination and a follow-on investigation is warranted. The North Parking Lot was an exposed dirt lot prior to 1981. Between 1979 and 1980 waste oils were applied to the surface of the lot to reduce fugitive dusts. The waste oil consisted primarily of Trimsol and other lubricants used at the plant. Analysis of the waste oil detected several solvent contaminants. Soil samples collected from the area detected only trace concentrations of heavy metals and no organic contaminants. Surface-water runoff from the site would flow east toward the San Jose Drain. Natural surface soils consist of loam and clay loam with relatively low permeability. Ground water is usually present at sixteen feet below ground. Clay is present between approximately two and eight feet deep, thus low permeability zones would be expected between the site and the water table. The site received a HARM score of 64.

TABLE 5.1

SITES EVALUATED USING THE HAZARD ASSESSMENT
RATING METHODOLOGY
AIR FORCE PLANT NO. 83

Rank	Site	Operating Period	Final HARM Score
1	North Parking Lot	1979-1980	64
1	Hazardous Waste Storage No. 1	1954-Present	62
2	Hazardous Waste Storage No. 3	Late 1950's to Present	60
4	Hazardous Waste Storage No. 4	Mid 1970's-1981	54
5	Underground Cyanide Vault	Mid 1950's to Late 1970's	51

HAZARDOUS WASTE STORAGE NO. 1

There is sufficient evidence that the Hazardous Waste Storage No. 1 site has potential for creating environmental contamination and a follow-on investigation is warranted. Hazardous Waste Storage No. 1 has been used as a chemical waste storage area since approximately 1954. The principal waste materials stored at the site were waste oils, coolants (Trimsol) and some solvents. The area is located on the south end of the plant and houses several different types of storage tanks. All of the tanks are situated on a concrete slab. Two of the larger tanks used for storing waste Trimsol have recently been deactivated and cleaned. The occurrence of spillage in the area was evident from the coloration of the concrete and asphalt in the vicinity of the waste storage area, as well as the Trimsol contamination observed on the surface of the storm water contained in the concrete pit surrounding the Trimsol tanks. Surface-water runoff at this site would flow south and east to the San Jose Drain. Natural surface soils consist of loam and clay loam with relatively low permeability. Ground water is usually present at twenty feet below ground. Subsurface sediments consist of sand with minor amounts of clay, thus the subsurface permeability would be expected to be higher than the surface soil zone permeability. The site received a HARM score of 62.

HAZARDOUS WASTE STORAGE NO. 3

There is sufficient evidence that the Hazardous Waste Storage No. 3 site has potential for creating environmental contamination and a follow-on investigation is warranted. Hazardous Waste Storage No. 3 has been an active chemical waste storage area since the late 1950's. The site is located on the north side of the plant just south of Building 30. Essentially all of the chemical wastes generated at the plant have been stored for one period or another at this site. Until early 1983, the chemicals were stored in drums or other smaller containers directly on a hard-packed dirt base. In 1981, the site was covered with approximately six inches of sand. During the study, it was indicated that the dirt base had been discolored. The discoloration may have been a result of past leaks and spills in the area or from suspected applications of waste oil to reduce fugitive dust. Soil samples were collected in and

around the site. The samples were tested for hydrocarbons and lead. Hydrocarbon concentrations ranged from non-detectable to 191 ug/g. Lead concentrations ranged from 5 to 168 ug/g. Surface-water runoff from this site would flow east toward the San Jose Drain. Natural surface soils consist of clay loam with relatively low permeability. Ground water is usually present at sixteen feet below ground. Clay is present between approximately two and seven feet deep, thus low permeability zones would be expected between the site and the water table. The site received a HARM score of 60.

HAZARDOUS WASTE STORAGE NO. 4

There is sufficient evidence that the Hazardous Waste Storage No. 4 site has potential for creating environmental contamination and a follow-on investigation is warranted. Hazardous Waste Storage No. 4 is situated on the north end of the plant site in an area which now serves as the North Parking Lot. Between the mid 1970's and 1981, drums of waste freon and waste 1,1,1 trichloroethane were accumulated in this location. It was estimated that as many as 120 drums were stored on the bare earth lot. The drums were removed for contract disposal in 1981. It was reported that some small leaks may have occurred while the drums were in storage. However, since both solvents are highly volatile, it is unlikely that minor leakage would have caused any long term contamination. The majority of this past storage area is now paved. Surface-water runoff from this site would flow east toward the San Jose Drain. Natural surface soils consist of loam and clay loam with relatively low permeability. Ground water is usually present at sixteen feet below ground. Clay is present between approximately two and eight feet deep, thus low permeability zones would be expected between the site and the water table. The site received a HARM score of 54.

UNDERGROUND CYANIDE VAULT

There is sufficient evidence that the Underground Cyanide Vault has potential for creating environmental contamination and a follow-on investigation is warranted. The Underground Cyanide Vault, located on the southeast corner of Building No. 6, was installed in the late 1950's to collect spillage from plating vats located in Building No. 6. The

primary purpose of the vault was to prevent the release of cyanide solutions utilized in the plating operations. The concrete vault was described as having walls with dimensions of 3'x3'x4' and a steel cover. The vault was reported to have no outlets. The interviews conducted during the site investigation revealed conflicting stories as to whether or not any cyanide wastes entered the vault. The cover of the vault is located beneath a paved area and therefore, could not be inspected during the site visit. The natural surface soils consist of clay loam with relatively low permeability. Ground water is usually present at eighteen feet below ground. Clay exists between approximately three and seven feet deep, thus low permeability zones would be expected between the vault and the water table. The site received a HARM score of 51.

GROUND-WATER CONTAMINATION IN THE SAN JOSE AREA OF THE SOUTH VALLEY OF ALBUQUERQUE

USAF Plant No. 83 is located in the general area of an EPA designated ground-water contamination problem in the San Jose Area of the South Valley of Albuquerque. City wells SJ3 and SJ6 are not being used due to organic contamination. The plant has been named by EPA as one of the many potentially responsible parties based on an Order of Consent issued under the authority of Section 106 of CERCLA. Several potentially responsible parties are conducting or have completed conducting an investigation of the ground-water conditions underlying their respective property. Organic compounds used at the plant and at other industrial sites in the area have been found in the plant monitoring wells and in wells SJ3 and SJ6. Seven organic contaminants have been detected in the monitoring wells on the plant. The concentration of one organic contaminant, 1,1-dichlorethane, was found to be above the NMWQCC Human Health Standard.

Hydrogeologically, the plant is located in an area which is underlain by clay layers which are not present in areas southeast of the city wells SJ3 and SJ6. These clay layers act as low permeability zones which would tend to slow the vertical migration of ground water from the shallow water-table aquifer to the deeper regional water-table aquifer from which wells SJ3 and SJ6 withdrew water while pumping. Data presently available does not allow the complete evaluation of the ground-water conditions underlying the plant.

CHAPTER 6
RECOMMENDATIONS

PHASE II MONITORING

Five sites were identified at Air Force Plant No. 83 as having the potential for environmental contamination (Figure 6.1). These sites have been evaluated using the HARM system which assesses their relative potential for contamination. As a result of the information collected during the study, it was determined that additional data and/or information concerning each of the sites would be required in order to clearly ascertain whether or not the site was contributing to any form of environmental contamination. Therefore, the following recommendations have been developed for each of the sites. The recommended actions are generally one-time sampling programs to determine if contamination does exist at the site. If contamination is identified, the sampling program may need to be expanded to define the extent of contamination. Ground-water monitoring wells should be installed and sampled in both the shallow water-table aquifer and the regional water-table aquifer. The wells should be constructed of 2-inch diameter stainless steel screen and casing. Stainless steel is recommended due to the potential problem of PVC screen and casing contributing organics to the well water and due to the relatively low values of organic contaminants found to date in the plant monitoring wells. Stainless steel would improve the accuracy of the well sample analyses. During the well installations readings with an organic vapor analyser or similar equipment should be made. Wells placed into the shallow water-table aquifer should be approximately 25 feet deep. The wells placed into the regional water-table aquifer should be approximately 150 feet deep. The complete EPA designated list of priority pollutants except asbestos should be analyzed in each sample. The recommended monitoring program for Phase II is summarized in Table 6.1.

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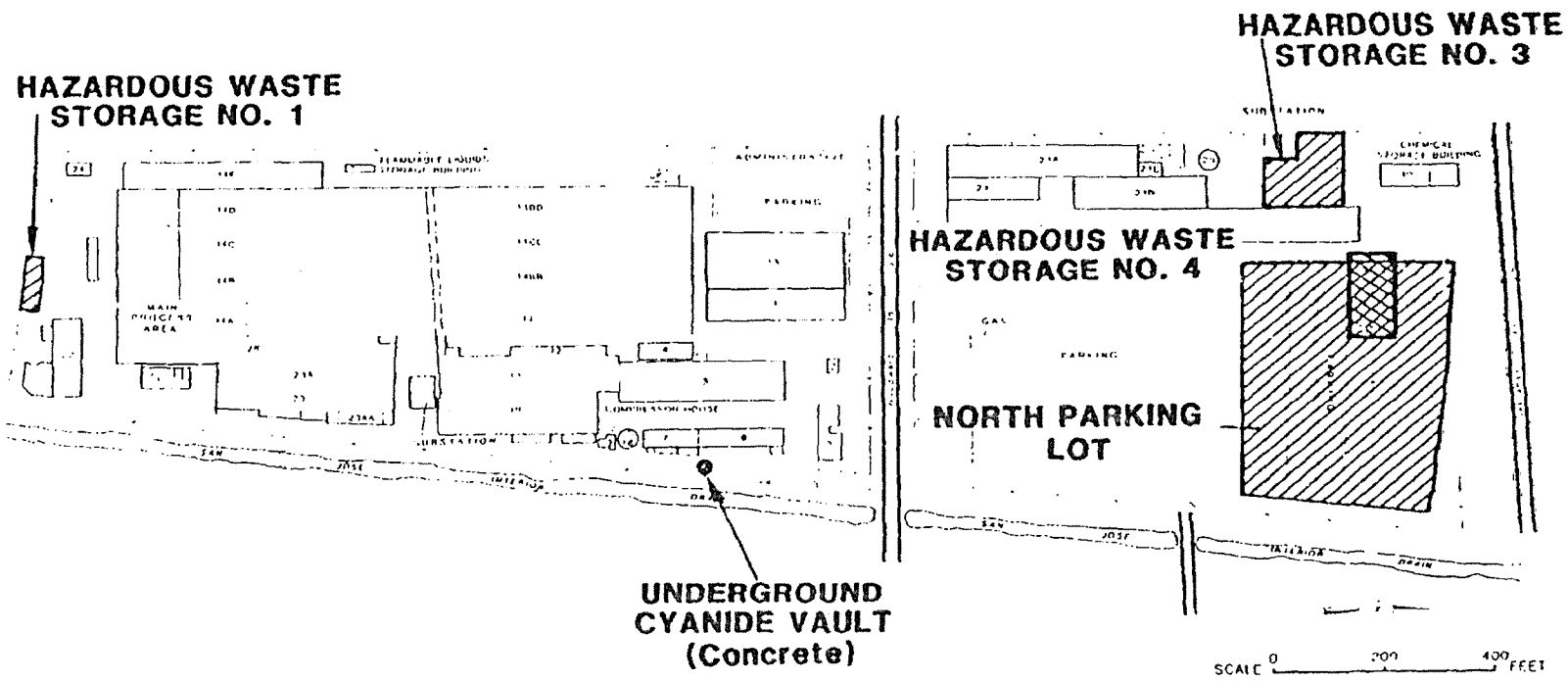
GENERAL ELECTRIC ALBUQUERQUE PLANT

SITES OF POTENTIAL ENVIRONMENTAL CONTAMINATION



SOURCE: USAF PLANT NO. 83 DOCUMENTS

FIGURE 6.1

TABLE 6.1
RECOMMENDED MONITORING PROGRAM FOR PHASE II
USAF PLANT NO. 83

Ranking Number	Site Name	Rating Score	Recommended Monitoring	Sample Analyses	Comments
1	North Parking Lot	64	Conduct shallow soil coring and sampling; coordinate placement of wells for this site with Hazardous Waste Storage No. 4; sample existing well SV15.	Complete priority pollutants except asbestos.	Continue monitoring if sampling indicates contamination. Additional wells may be necessary to assess extent of contamination.
2	Hazardous Waste Storage No. 1	62	Conduct shallow soil coring and sampling; install and sample 1 upgradient and 1 downgradient well in the shallow water-table aquifer and 1 upgradient and 1 downgradient well in the regional water-table aquifer and sample existing well SV8.	Complete priority pollutants except asbestos.	Continue monitoring if sampling indicates contamination. Additional wells may be necessary to assess extent of contamination.
3	Hazardous Waste Storage No. 3	60	Conduct shallow soil coring and sampling; install and sample 1 upgradient and 2 downgradient wells in the shallow water-table aquifer and 1 upgradient and 2 downgradient wells in the regional water-table aquifer.	Complete priority pollutants except asbestos.	Continue monitoring if sampling indicates contamination. Additional wells may be necessary to assess extent of contamination.
4	Hazardous Waste Storage No. 4	54	Conduct shallow soil coring and sampling; coordinate placement of wells for this site with North Parking Lot; sample existing well SV15.	Complete priority pollutants except asbestos.	Continue monitoring if sampling indicates contamination. Additional wells may be necessary to assess extent of contamination.
5	Underground Cyanide Vault	51	Inspect vault for leakage; if leakage has occurred install and sample 1 downgradient well in the shallow water-table aquifer; inspect existing wells B1 and/or B2 by downhole geophysical techniques and sample as upgradient wells; if contamination is found in shallow water-table aquifer, install and sample 1 downgradient well in regional water-table aquifer; sample existing well SV9.	pH, Total Dissolved Solids, Cyanide, EP Toxicity Metals.	Continue monitoring if sample indicates contamination. Additional wells may be necessary to assess extent of contamination.

1) North Parking Lot - At least ten soil core samples should be collected from the parking lot. The samples should be analyzed for the parameters on the complete EPA designated priority pollutant list except asbestos. Soil pH should also be tested. The core samples should be approximately 3 feet in depth.

One upgradient and two downgradient wells should be installed in the shallow water-table aquifer. One upgradient and two downgradient wells should be installed in the regional water-table aquifer. The wells will also serve as monitoring wells for Hazardous Waste Storage No. 4. Samples from the wells and existing well SV15 should be analyzed for the parameters on the complete EPA designated priority pollutant list except asbestos.

2) Hazardous Waste Storage No. 1 - At least ten soil core samples should be collected in the areas adjacent to the storage area to determine whether any soil or asphalt contamination may have resulted from runoff from the site. The samples should be collected south of the "green tank" and "swimming pool" tanks along the facility fence line. Samples of soil and asphalt should also be collected on the east and west sides of the storage area. Samples should be collected in the areas which have any visual evidence of oil contamination. One control core sample should be collected from an area close to the test area but away from hazardous waste or industrial activities. The core samples should be a minimum of 1 foot in depth and at least four samples including the control should be 3 feet in depth. The samples should be analyzed for the parameters on the complete EPA designated priority pollutant list except asbestos. Soil pH should also be tested.

One upgradient and one downgradient well should be installed in the shallow water-table aquifer. One upgradient and one downgradient well should be installed in the regional water-table aquifer. Samples from the wells and existing well SV8 should be analyzed for the parameters on the complete EPA designated priority pollutant list except asbestos.

3) Hazardous Waste Storage No. 3 - At least ten core samples should be collected in the areas within and adjacent to the storage area to determine whether any soil, sand or asphalt contamination exists at the site, as well as whether any contamination may have migrated from the site. The samples should be analyzed for the parameters on the complete EPA designated priority pollutant list except asbestos. Soil pH should also be tested. The core samples should be a minimum of 1 foot in depth and at least four samples should be 3 feet in depth.

One upgradient and two downgradient wells should be installed in the shallow water-table aquifer. One upgradient and one downgradient well should be installed in the regional water-table aquifer. Samples from the wells should be analyzed for the parameters on the complete EPA designated priority pollutant list except asbestos.

4) Hazardous Waste Storage No. 4 - Hazardous Waste Storage No. 4 is located within the North Parking Lot and therefore, the sampling program for this site will be combined with the sampling program for the North Parking Lot. At least two of the ten soil core samples for the North Parking Lot should be taken within the Hazardous Waste Storage No. 4. These two core samples should be 5 feet deep.

The ground-water monitoring wells for this site will be the same wells as for the North Parking Lot. Samples from the wells and existing wells SV15 should be analyzed for the parameters on the complete EPA designated priority pollutant list except asbestos.

5) Underground Cyanide Vault - During the site investigation the precise location of the underground vault could not be determined because the area had been paved. Further investigations should be conducted to locate the vault. A metal detector may be useful to identify the location of the vault's steel cover. When the vault

is located, the cover should be removed to determine whether any materials are still contained within the concrete chamber. If any materials are found, they should be removed and analzyed for cyanide and the EP Toxicity metals. The interior of the chamber should also be inspected to determine whether any leakage was evident.

If leakage has occurred, one downgradient monitoring well should be installed into the shallow water-table aquifer. Wells B1 or B2 could be used as upgradient wells. These wells would need to be geophysically logged to determine the exact screen settings prior to use. If cyanide contamination is confirmed in the shallow water-table aquifer, one downgradient well should be installed in the regional water-table aquifer. The upgradient well for either of the other two sites (Hazardous Waste Storage No. 1 or Hazardous Waste Storage No. 3) could be used as the upgradient well for this site in the regional water-table aquifer. Samples from the well and existing wells should be analyzed for pH, total dissolved solids, cyanide and EP toxicity metals.

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APPENDIX A

BIOGRAPHICAL DATA

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Roger E. Mayfield, P.E., Project Manager	A-1
Mark I. Spiegel	A-3
H. Dan Harman, P.G.	A-6

Biographical Data

R. E. Mayfield, P.E.

Civil/Environmental Engineer

Education

B.S. Civil Engineering, New Mexico State University, 1976.
M.S.C.E., Sanitary Engineering, New Mexico State University, 1978.

Professional Affiliations, Honors and Awards

Registered Professional Engineer (Georgia, #13254)
Georgia Water Control Association
Water Pollution Control Federation
Chi Epsilon
Tau Beta Pi

Experience Record

1972 - 1973 National Soils Service, Inc., Houston, TX
1978 - Date Engineering-Science, Inc., Atlanta, GA

Pertinent Experience

Mr. Mayfield has over four years project experience while working for Engineering-Science in liquid and solid waste management and spill control planning for both governmental and industrial clients. His experience includes planning, conducting and managing both investigative and design type projects. Specific management and engineering experience is highlighted below.

- Project engineer for identifying potential chemical spill situations and developing effective spill prevention, control and countermeasures (SPCC) plans for three industrial clients.

- Project Manager for an investigation of an abandoned hazardous waste landfill site. The project was sponsored by an industrial firm which had utilized the site during its active life. Project objectives included definition of site geology, hydrogeology and shydrology. The project resulted in collection of sufficient information for development of a remedial action plan and detailed design of closure procedures. Recommendations were made on the necessary steps to secure the site.

- Project Engineer on an Air Force Phase I IRP project conducted at a base located in the southwestern U. S. Responsibilitites included investigation of closed on-base landfill disposal sites.

- Project Engineer on a hazardous waste management study for a major plastics manufacturing company. Responsibilitites included identification and investigation of a number of operating commercial hazardous waste landfills and incinerators.

R. E. Mayfield, P.E. (Continued)

Recommendations were developed concerning the client's best disposal alternatives based on economic, technical, and regulatory considerations.

- Project Engineer involved in a detailed technical critique of a proposed hazardous waste disposal landfill design. Site soils and hydrologic conditions were examined as well as the proposed civil design. Facility design and site conditions were compared to RCRA 3004 Guidelines as well as regulations issued by several state agencies.

Publications and Presentations

"LFDESIGN; A Computer Model to Design and Cost Disposal Facilities for Fossil Energy Wastes," Summary Review of Fossil Energy Waste Sampling and Characterization Program, Laramie Energy Technology Center, Laramie, Wyoming, August 1982.

"Development of Preliminary Hazardous and Non-Hazardous Wastes Landfill Designs using Computer Methods", D.O.E. RCRA Utility Advisory Task Force Meeting, Atlanta Georgia, February 1982.

"Study of Solid Waste Managemen lternatives for the City of Murray, Kentucky," prepared for Office of Solid Waste Management, U.S. EPA, Region IV, Atlanta, Georgia, October 1979.

"Technical Assistance to the City of Birmingham, Alabama," prepared for Office of Solid Waste Management, U.S. EPA, Region IV, Atlanta, Georgia, October 1980.

"Technical Assistance to the City of Aiken, South Carolina," prepared for Office of Solid Waste Management, U.S. EPA, Region IV, Atlanta, Georgia, December 1980.

"Textile Industry/EPA Technical Study of July 1974 BATEA Effluent Standards," prepared for Industrial Processes Division, Industrial Environmental Research Lab, U.S. EPA, January 1980 (Coauthors, E. J. Schroeder and T. N. Sargent).

"Expansion and Improvement of the STPDESIGN Computer Program System, "M.S. Thesis, New Mexico State University, Las Cruces, New Mexico, 1978.

"State of the Art of Computer Programming in Sewage Treatment Plant Design," A.S.C.E. Conference on Computing in Civil Engineering, Atlanta, Georgia, June 1978 (Coauthors, W. A. Barkely, R. D. Hill, and T. M. Shoemarker).

#10

Biographical Data

MARK I. SPIEGEL

Environmental Scientist

Personal Information

Date of Birth: 11 April 1954

Education

B.S. in Environmental Health Science (Magna cum laude), 1976, University of Georgia, Athens, Georgia
Limnology and Environmental Biology, University of Florida, Gainesville, Florida
MBA 1983, Marketing, Georgia State University

Professional Affiliations

American Water Resources Association
Technical Association of the Pulp and Paper Industry

Experience Record

1974-1976 U.S. Environmental Protection Agency, Surveillance and Analysis Division. Cooperative Student. On assignment to Air Surveillance Branch, participated in ambient air study in Natchez, Mississippi, and operated unleaded fuel sampling program for Southeast National Air Surveillance Network. For Engineering Branch, participated in NPDES compliance monitoring of industrial facilities throughout the southeast; operation and maintenance studies of municipal waste treatment facilities; and post-impoundment study of West Point Reservoir, West Point, Georgia. Participated in industrial bioassay studies for the Ecological Branch.

1977-Date Engineering-Science. Environmental Scientist. Responsible for the conduct of water and wastewater sampling programs and analyses, quality control, laboratory process evaluations, and evaluation of other environmental assessment data. Conducted leachate extraction studies of sludges produced at a large organic chemicals plant to define nature of sludges according to the Resource Recovery and Conservation Act Guidelines. Involved in laboratory quality assurance program for the analysis of water samples used in a stream modeling project. Conducted a water quality modeling study for Amerada Hess Corporation to determine the assimilative capacity of

Mark I. Spiegel (Continued)

a stream receiving effluent from a southern Mississippi refinery.

Participated in bench-scale industrial treatability studies conducted for the American Textile Manufacturers Institute and Eli Lilly Pharmaceuticals in Mayaguez, Puerto Rico, and in carbon adsorption studies for an American Cyanamid chemical plant and Union Carbide Agricultural Products Division.

Involved in various aspects of several industrial environmental impact assessments including preliminary planning for a comprehensive study for St. Regis Paper Company on a major pulp and paper mill expansion project. Assisted in preparation of third-party EIS for EPA and Mobil Chemical Company concerning a proposed 16,000-acre phosphate mining and beneficiation facility. Developed an EIA prior to construction of a pulp and paper complex by the Weyerhaeuser Company in Columbus, Mississippi, which included preparation of a separate document for the Interstate Commerce Commission concerning the construction of a railroad spur to serve the complex. Also involved in formulating the water quality, water resource and socio-economic aspects of an environmental impact assessment for International Paper Company. Participated in large scale site evaluation to determine the suitability and environmental permitting requirements of a site for an east coast brewery for the Adolph Coors Company. Participated in a study to evaluate various options for developing a large parcel of land in the coastal section of North Carolina. The study involved evaluating both the market potential and environmental constraints of various options for development such as timber harvesting, peat mining, corporate farming and aquaculture.

Project Manager. Conducted comprehensive process evaluation of an 80 mgd wastewater treatment system for Weyerhaeuser Company. Responsible for a study to determine the leaching characteristics of sludges for a paint manufacturing facility for RCRA compliance. Also managed study for development of a solid waste management plan for a ceramic pottery manufacturer in northern Alabama which included evaluating surface and ground-water contamination potential from existing disposal site and assisting manufacturer in developing a disposal program acceptable to state agencies.

Mark I. Spiegel (Continued)

Participated as project team member for Phase I Installation Restoration Program projects for the Department of Defense. Studies were conducted at twelve Air Force bases to identify past hazardous waste disposal practices that could result in migration of contaminants and to recommend priority sites requiring further investigation.

Developed an Environmental Audit Manual for a pharmaceutical company. The purpose of the audit manual was to aid the company in identifying areas where a particular facility may not comply with Federal and state environmental regulations.

10/83

Biographical Data

H. DAN HARMAN, JR.
Hydrogeologist

Personal Information

Date of Birth: 7 December 1948

Education

B.S., Geology, 1970, University of Tennessee, Knoxville, TN

Professional Affiliations

Registered Professional Geologist (Georgia NO.569)
National Water Well Association (Certified Water Well Driller No. 2664)
Georgia Ground-Water Association

Experience Record

1975-1977 Northwest Florida Water Management District, Havana, Florida. Hydrogeologist. Responsible for borehole geophysical logger operation and log interpretation. Also reviewed permit applications for new water wells.

1977-1978 Dixie Well Boring Company, Inc., LaGrange, Georgia. Hydrogeologist/Well Driller. Responsible for borehole geophysical logger operation and log interpretation. Also conducted earth resistivity surveys in Georgia and Alabama Piedmont Provinces for locations of water-bearing fractures. Additional responsibilities included drilling with mud and air rotary drilling rigs as well as bucket auger rigs.

1978-1980 Law Engineering Testing Company, Inc., Marietta, Georgia. Hydrogeologist. Responsible for ground-water resource evaluations and hydrogeological field operations for government and industrial clients. A major responsibility was as the Mississippi Field Hydrologist during the installation of both fresh and saline water wells for a regional aquifer evaluation related to the possible storage of high level radio-active waste in the Gulf Coast Salt Domes.

1980-1982 Ecology and Environment, Inc., Decatur, Georgia. Hydrogeologist. Responsible for project management of hydrogeological and geophysical investigations at uncontrolled hazardous waste sites. Also prepared Emergency Action Plans and Remedial Approach Plans for U.S. Environmental Protection Agency. Additional

H. Dan Harman, Jr. (Continued)

responsibilities included use of the MITRE hazardous ranking system to rank sites on the National Superfund List.

1982-1983 NUS Corporation, Tucker, Georgia. Hydrogeologist. Responsible for project management of hydrogeological and geophysical investigations at uncontrolled hazardous waste sites.

1983-Date Engineering-Science, Inc., Atlanta, Georgia. Hydrogeologist. Responsible for hydrogeological evaluations during Phase I Installation Restoration Program projects for the Department of Defense.

Publications and Presentations

"Geophysical Well Logging: An Aid in Georgia Ground-Water Projects," 1977, coauthor: D. Watson, The Georgia Operator, Georgia Water and Pollution Control Association.

"Use of Surface Geophysical Methods Prior to Monitor Well Drilling," 1981. Presented to Fifth Southeastern Ground-Water Conference, Americus, Georgia.

"Cost-Effective Preliminary Leachate Monitoring at an Uncontrolled Hazardous Waste Site," 1982, coauthor: S. Hitchcock. Presented to Third National Conference on Management of Uncontrolled Hazardous Waste Sites, Washington, D.C.

"Application of Geophysical Techniques as a Site Screening Procedure at Hazardous Waste Sites," 1983, coauthor: S. Hitchcock. Proceedings of the Third National Symposion and Exposition on Aquifer Restoration and Ground-Water Monitoring, Columbus, Ohio.

APPENDIX B

LIST OF INTERVIEWEES

APPENDIX B

LIST OF INTERVIEWEES

Most Recent Position	Years of Service
1. Environmental Protection Engineer	<1
2. Manager of Employee and Community Relations	7
3. Supervisor of Safety and Security	5
4. Truck Driver	27
5. Waste Collector	<1
6. Maintenance Manager (retired)	25
7. Manager, Manitenance and Plant Engineering	29
8. Truck Driver	26
9. Truck Driver	27
10. Manager, Material Services	25
11. Manager, Non-Destructive Testing	23
12. ACF Plant Superintendent	14
13. ACF Plant Engineer	14
14. Manager, Quality Control Laboratory	22
15. Purchasing Agent	27
16. Chemical Engineer Quality Control	26
17. Supervisor Lift Truck Operations	28
18. Buyer, Chemical Products	15
19. Process Engineer, Plating	15
20. Manager of Safety Branch	12
21. Manager of Manufacturing	25

OUTSIDE AGENCY CONTACTS

Agency	Contact
City of Albuquerque, Water Resources Dept., Albuquerque, NM; Assistant Systems Planning Engineer; (505) 766-7354	Brian Pirooz
City of Albuquerque, Water Systems Division, Albuquerque, NM; Division Head; (505) 766-7100	Sam Cummings
City of Albuquerque, Wastewater Treatment Plant, Albuquerque, NM; Maintenance Superintendent; (505) 766-7955	George Holley
New Mexico Department of Game and Fish, Santa Fe, NM; (505) 827-7882	Publication Clerk
New Mexico Health and Environment Dept, Environmental Improvement Div., Water Pollution Control Bureau, Santa Fe, NM; Geologist; (505) 984-0020	Dennis McQuillan
New Mexico Health and Environment Dept, Water Quality Control Commission, Santa Fe, NM; (505) 827-5271	Publication Clerk
New Mexico State Engineers Office Albuquerque, NM; Engineer; (505) 841-6323	Jack Reed
New Mexico State Engineer Office, Water Use and Reports Section, Santa Fe, NM; Section Head; (505) 827-6110	Robert L. Borton
Middle Rio Grande Conservancy District, Albuquerque, NM; District Engineer; (505) 243-6796	Mr. Shah
U.S. Army Corps of Engineers, Albuquerque, NM; Technical Services Representative (505) 766-2616	Thomas Ryan
U.S. Department of Agriculture, Soil Conservation Service, Albuquerque, NM; (505) 766-3277	Publications Clerk
U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Climatic Data Center, Asheville, NC; (704) 259-0682	Publication Clerk

U.S. Department of Defense, Defense Logistics Agency, DLAS Residency - Albuquerque, NM Administrative Contracting Office (505) 844-3418	George Wilkinson
U.S. Department of Energy, ALO (Legal) - Albuquerque, NM; (505) 846-2123	Jim Randall
U.S. Environmental Protection Agency, Superfund Division, Enforcement Section, Dallas, Texas; Environmental Engineer (214) 767-9703	Larry Wright
U.S. Geological Survey, Water Resources Division, Albuquerque, NM; Hydrologist (505) 766-6506	Georgianna E. Kues
U.S. Geological Survey, Water Resources Division, Albuquerque, NM; Water Quality Specialist (505) 766-1173	Kim Ong

APPENDIX C

AIR FORCE PLANT NO. 83

SUPPLEMENTAL INFORMATION AND DATA

C-1 - Ground-Water Quality Data
C-2 - Analytical Results for Soil Samples Taken in the Vicinity of Hazardous Waste Storage Area No. 3
C-3 - Analytical Results for the Soil Sample Taken in the North Parking Lot

APPENDIX C-1

GROUND-WATER QUALITY DATA

APPENDIX C-1

ADDITIONAL GROUND-WATER QUALITY DATA FOR USAF PLANT NO. 83 AND VICINITY

(Parameter analyses are presented in milligrams per liter)

Well Identification	Parameter	New Mexico Standard	Date of Sample Collection (mn-yr) 6-80	11-80	12-80	2-81 (split sample)	2-81	2-81	2-81	10-81	2-82	2-82 (split sample)	2-82
	Benzene	0.01	DNQ	ND	ND	ND	ND	ND	ND	ND	ND	NA	ND
	Methyl-	0.01	DNQ	ND	ND	ND	ND	ND	ND	ND	ND	NA	ND
	Dimethyl-	NS	NA	NA	NA	NA	NA	NA	NA	ND	NA	NA	NA
	Ortho-	NS	NA	NA	NA	NA	NA	NA	NA	ND	NA	NA	NA
	Ethyl-	NS	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	Methane												
	Dichloro-	NS	DNQ	ND	ND	ND	ND	ND	ND	ND	ND	0.004	ND
	Trichloro-	NS	DNQ	ND	ND	ND	ND	<0.010	ND	NA	ND	0.003	ND
SJ6 (Albuquerque San Jose Well Field)	Tetrachloro-	0.01	DNQ	ND	ND	ND	ND	ND	ND	NA	ND	0.001	<0.001
	Ethane												
	1,1-Dichloro-	NS	ND	ND	ND	0.006	<0.010	<0.010	<0.010	DNQ	ND	<0.003	0.013
	1,2-Dichloro-	0.02	NA	ND	ND	ND	ND	ND	ND	NA	ND	<0.001	0.004
	1,1,1-Trichloro-	NS	NA	ND	ND	ND	ND	ND	ND	ND	ND	<0.001	ND
	1,1,2-Trichloro-	NS	NA	ND	ND	ND	ND	ND	ND	NA	ND	NA	NA
	1,1,2,2-Tetrachloro-	NS	NA	ND	ND	ND	ND	ND	ND	NA	ND	NA	NA
	Ethene												
	1,1-Dichloro-	0.005	DNQ	ND	0.011	0.007	0.011	<0.010	0.010	NA	ND	<0.003	0.010
	1,2-Trans-Dichloro-	NS	NA	ND	ND	<0.001	ND	<0.010	ND	DNQ	ND	NA	ND
	Trichloro-	0.1	DNQ	ND	0.010	0.006	0.010	<0.010	<0.010	DNQ	ND	0.006	0.021
	Tetrachloro-	0.02	DNQ	ND	ND	0.004	<0.010	<0.010	<0.010	DNQ	ND	0.004	0.016
	1,2-Dichloropropane	NS	NA	ND	ND	ND	ND	ND	ND	NA	ND	NA	NA
	Acetone	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Methyl Ethyl Ketone	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Other Organics	NS	DNQ	DNQ	NA	NA	NA	NA	NA	NA	NA	NA	NA
	3-Methyl 1-2-Butanone	NS	NA	NA	NA	NA	NA	NA	NA	DNQ	NA	NA	NA

Source: McQuillan, et al., 1982

NA = Not Analyzed
ND = Not Detected
mn-yr = month-year

DNQ = Detected but not quantified
NS = No Standard

APPENDIX C-1 (Continued)

ADDITIONAL GROUND-WATER QUALITY DATA FOR USAF PLANT NO. 83 AND VICINITY

(Parameter analyses are presented in milligrams per liter)

Well Identification	Parameter	New Mexico Standard	Date of Sample Collection (mo-dy-yr) 6-25-80	9-9-82	9-9-82 (split sample)	Well Identification	Date of Sample Collection 9-7-82	9-7-82 (split sample)	Well Identification	Sample Collect. 9-7-82	Well Identification	Date of Sample Collection 9-8-82	9-8-82 (split sample)
	Benzene	0.01	ND	ND	ND		ND	ND		ND		ND	ND
	Methyl-	0.01	.52	NA	NA		ND	ND		ND		ND	ND
	Dimethyl-	NS	.310	.300	NA		NA	NA		NA		NA	NA
	Ortho-	NS	.190	NA	NA		NA	NA		NA		NA	NA
	Ethyl-	NS	.016	.300	ND		ND	ND		ND		ND	ND
	Methane												
	Dichloro-	NS	6.3	37	35.4		ND	ND		ND		NA	ND
	Trichloro-	NS	.130	.05	ND		ND	ND		ND		ND	ND
	Tetrachloro-	0.01	ND	ND	ND		ND	ND		ND		ND	ND
SV10 (Monitor well on Amerigas Co. Property)	Ethane												
	1,1-Dichloro-	NS	ND	1.7	41.6	SV8 (Monitor Well on USAF Plant No. 83 Property	ND	ND	SV9 (Monitor Well on USAF Plant No. 83 Property	ND	SV15 (Monitor Well on USAF Plant No. 83 Property	0.049	0.017
	1,2-Dichloro-	0.02	ND	.035	ND		ND	ND		0.0015		ND	ND
	1,1,1-Trichloro-	NS	5.5	15	82.1		ND	ND		0.0038		0.002	ND
	1,1,2-Trichloro-	NS	ND	ND	ND		ND	ND		ND		ND	ND
	1,1,2,2-Tetrachloro-	NS	ND	ND	ND		ND	0.0012		ND		ND	ND
	Ethene												
	1,1-Dichloro-	0.005	.620	9	ND		ND	ND		ND		0.009	0.009
	1,2-Trans-Dichloro-	NS	1.5	ND	61		ND	ND		ND		ND	ND
	Trichloro-	0.1	3.1	6	85.6		ND	ND		ND		0.0006	0.0013
	Tetrachloro-	0.02	9.4	20	13.2		ND	ND		0.0018		ND	ND
	1,2-Dichloropropane	NS	ND	NA	ND		NA	ND		ND		NA	ND
	Acetone	NS	100	150	82.2		NA	NA		NA		NA	NA
	Methyl Ethyl Ketone	NS	4.5	6	22.5		NA	NA		NA		NA	NA
	113 Freon									DNQ			DNQ

NA = Not Analyzed
ND = Not Detected
NS = No Standard

DNQ = Detected but not quantified
mo-dy-yr = month-day-year

Source: McQuillan, et al., 1982

APPENDIX C-2

RESULTS FOR SOIL SAMPLES TAKEN IN THE VICINITY

OF HAZARDOUS WASTE STORAGE AREA NO. 3

Source: Closure Plan and Financial Requirements
for Interim Status Hazardous Waste Storage Facilities,
General Electric Co. Aircraft Engine Business Group
Albuquerque, NM Air Force Plant No. 83, August 1983

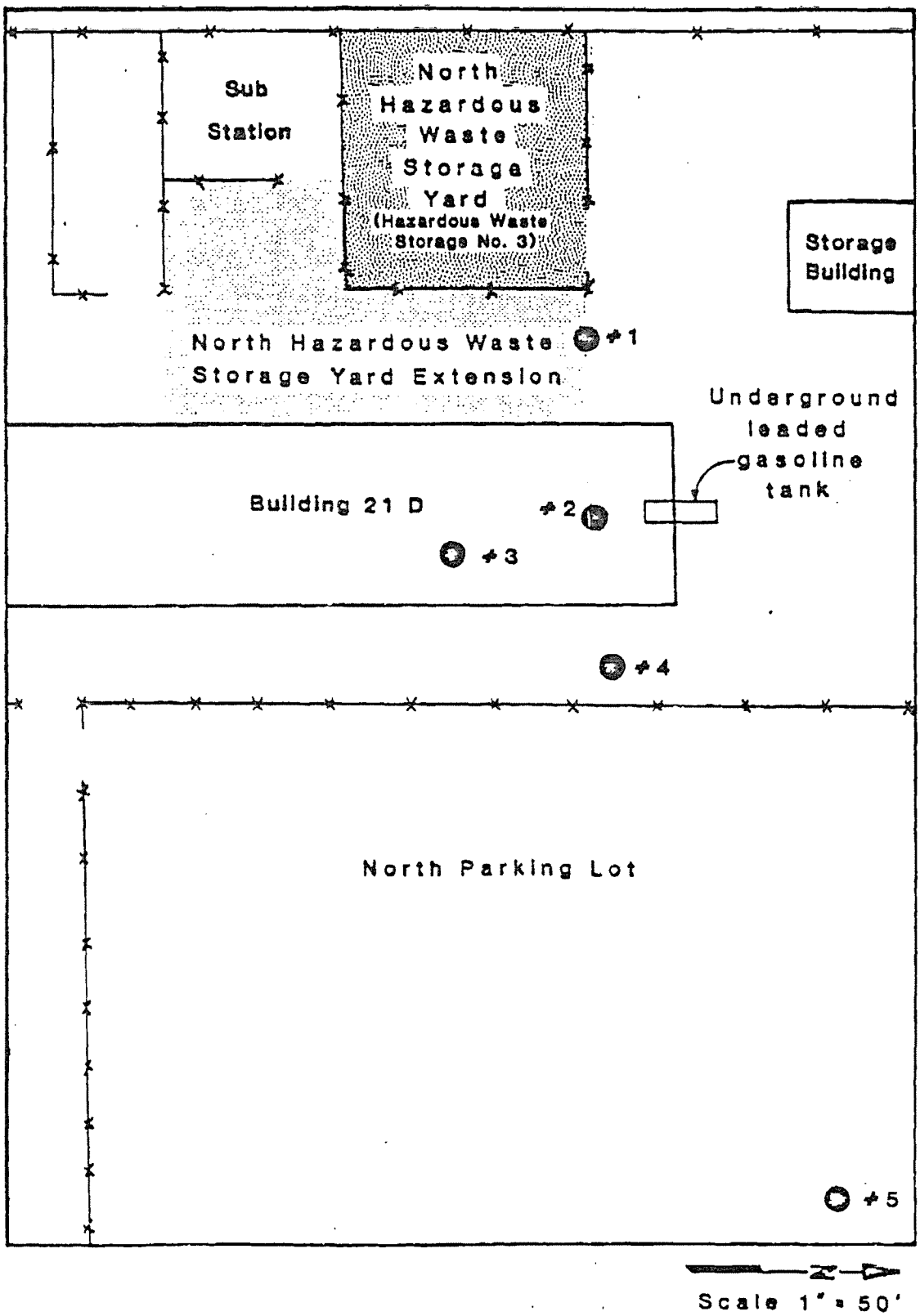


Figure C-1 Soil Samples Taken Near the Underground Leaded Gasoline Tank in March, 1982

WILSON LABORATORIES

525 NORTH NINTH STREET - P.O. BOX 1858 - SALINA, KANSAS 67401 - (913)825-7186

LABORATORY REPORT PAGE 1

CLIENT: GENERAL ELECTRIC
ATTN: JIM BAECHTEL
336 WOODWARD ROAD
ALBUQUERQUE, NM 87102

DATE RPTD.: 06/10/82
DATE RCVD.: 05/21/82
PURCHASE AUTH: A4806434
FILE NO.: 81-9570

	CONCENTRATION	UNITS	ANALYST	BOOK/PAGE
LAB NUMBER: 8205-0314	SAMPLE DESCRIPTION: N. STORAGE YARD #1			
ORDER NUMBER: .2398	SPECIAL INSTRUCTIONS: ANALYZED AS RECEIVED			
DATE SAMPLED: 04/27/82	TIME SAMPLED: 10:00 A.M.			
HYDROCARBONS, TOTAL	392.	UG/G, DRY WT.	WAR	119 / 41
--CONCLUSION--LAB NUMBER: 8205-0314				
LAB NUMBER: 8205-0314D	SAMPLE DESCRIPTION: N. STORAGE YARD #1			
ORDER NUMBER: .2398	SPECIAL INSTRUCTIONS: ACID DIGESTION			
DATE SAMPLED: 04/27/82	TIME SAMPLED: 10:00 A.M.			
LEAD	143.	UG/G, DRY WT.	DEM	180 / 54
--CONCLUSION--LAB NUMBER: 8205-0314D				
LAB NUMBER: 8205-0315	SAMPLE DESCRIPTION: N. STORAGE YARD #2			
ORDER NUMBER: .2398	SPECIAL INSTRUCTIONS: ANALYZED AS RECEIVED			
DATE SAMPLED: 04/27/82	TIME SAMPLED: 10:15 A.M.			
HYDROCARBONS, TOTAL	496.	UG/G, DRY WT.	WAR	119 / 41
--CONCLUSION--LAB NUMBER: 8205-0315				
LAB NUMBER: 8205-0315D	SAMPLE DESCRIPTION: N. STORAGE YARD #2			
ORDER NUMBER: .2398	SPECIAL INSTRUCTIONS: ACID DIGESTION			
DATE SAMPLED: 04/27/82	TIME SAMPLED: 10:15 A.M.			
LEAD	40.	UG/G, DRY WT.	DEM	180 / 55
--CONCLUSION--LAB NUMBER: 8205-0315D				
LAB NUMBER: 8205-0316	SAMPLE DESCRIPTION: N STORAGE YARD 13			
ORDER NUMBER: .2398	SPECIAL INSTRUCTIONS: ANALYZED AS RECEIVED			
DATE SAMPLED: 04/27/82	TIME SAMPLED: 10:30 A.M.			

WILSON LABORATORIES

LABORATORY REPORT

CLIENT:GENERAL ELECTRIC

DATE RPTD.:06/10/82

ANALYSIS	CONCENTRATION	UNITS	ANALYST	BOOK/PAGE
HYDROCARBONS, TOTAL	621.	UG/G, DRY WT.	WAR	119 / 41

--CONCLUSION--LAB NUMBER: 8205-0316

LAB NUMBER:8205-0316D
ORDER NUMBER:.2398
DATE SAMPLED: 04/27/82

SAMPLE DESCRIPTION:N. STORAGE YARD #3
SPECIAL INSTRUCTIONS:ACID DIGESTION
TIME SAMPLED: 10:30 A.M.

LEAD	47.	UG/G, DRY WT.	DEM	180 / 56

--CONCLUSION--LAB NUMBER: 8205-0316D

LAB NUMBER:8205-0317
ORDER NUMBER:.2398
DATE SAMPLED: 04/27/82

SAMPLE DESCRIPTION:N. STORAGE YARD #4
SPECIAL INSTRUCTIONS:ANALYZED AS RECEIVED
TIME SAMPLED: 10:45 A.M.

HYDROCARBONS, TOTAL	596.	UG/G, DRY WT.	WAR	119 / 41

-CONCLUSION--LAB NUMBER: 8205-0317

LAB NUMBER:8205-0317D
ORDER NUMBER:.2398
DATE SAMPLED: 04/27/82

SAMPLE DESCRIPTION:N. STORAGE YARD #4
SPECIAL INSTRUCTIONS:ACID DIGESTION
TIME SAMPLED: 10:45 A.M.

LEAD	25.	UG/G, DRY WT.	DEM	180 / 57

- CONCLUSION--LAB NUMBER: 8205-0317D

LAB NUMBER:8205-0318
ORDER NUMBER:.2398
DATE SAMPLED: 04/27/82

SAMPLE DESCRIPTION:N. STORAGE YARD #5
SPECIAL INSTRUCTIONS:ANALYZED AS RECEIVED
TIME SAMPLED: 11:00 A.M.

HYDROCARBONS, TOTAL	279.	UG/G, DRY WT.	WAR	119 / 41

-CONCLUSION--LAB NUMBER: 8205-0318

LAB NUMBER:8205-0318D
ORDER NUMBER:.2398
DATE SAMPLED: 04/27/82

SAMPLE DESCRIPTION:N. STORAGE YARD #5
SPECIAL INSTRUCTIONS:ACID DIGESTION
TIME SAMPLED: 11:00 A.M.

LEAD	168.	UG/G, DRY WT.	DEM	180 / 58

WILSON LABORATORIES

LABORATORY REPORT

CLIENT:GENERAL ELECTRIC

DATE RPTD.:06/10/82

ANALYSIS	CONCENTRATION	UNITS	ANALYST	BOOK/PAGE

--CONCLUSION--LAB NUMBER: 8205-0318D

LAB NUMBER:8205-0319 SAMPLE DESCRIPTION:BACKGROUND NEAR ROAD #6
ORDER NUMBER:.2398 SPECIAL INSTRUCTIONS:ANALYZED AS RECEIVED
DATE SAMPLED: 05/17/82 TIME SAMPLED: 9:30 A.M.

HYDROCARBONS, TOTAL	291.1	MG/L	WAR	119 / 41

--CONCLUSION--LAB NUMBER: 8205-0319

LAB NUMBER:8205-0319D SAMPLE DESCRIPTION:BACKGROUND NEAR ROAD #6
ORDER NUMBER:.2398 SPECIAL INSTRUCTIONS:ACID DIGESTION
DATE SAMPLED: 05/17/82 TIME SAMPLED: 9:30 A.M.

LEAD	95.	UG/G, DRY WT.	DEM	180 / 59

--CONCLUSION--LAB NUMBER: 8205-0319D

LAB NUMBER:8205-0320 SAMPLE DESCRIPTION:BLDG. 22 O.S./N.W. #7
ORDER NUMBER:.2398 SPECIAL INSTRUCTIONS:ORGANIC PREP
DATE SAMPLED: 05/05/82 TIME SAMPLED: 11:30 A.M.

**GC/MS VOLATILE COMPOUNDS				
1V. ACROLEIN	ND(10)	UG/G	CK	175 / 106
2V. ACRYLONITRILE	ND(10)	UG/G	CK	175 / 106
3V. BENZENE	ND(1)	UG/G	CK	175 / 106
4V. BIS(CHLOROMETHYL)ETHER	ND(1)	UG/G	CK	175 / 106
5V. BROMOFORM	ND(1)	UG/G	CK	175 / 106
6V. CARBON TETRACHLORIDE	ND(1)	UG/G	CK	175 / 106
7V. CHLOROBENZENE	ND(1)	UG/G	CK	175 / 106
8V. CHLORODIBROMOMETHANE	ND(1)	UG/G	CK	175 / 106
9V. CHLOROETHANE	ND(1)	UG/G	CK	175 / 106
10V. 2-CHLOROETHYLVINYL ETHER	ND(1)	UG/G	CK	175 / 106
11V. CHLOROFORM	ND(1)	UG/G	CK	175 / 106
12V. DICHLOROBROMOMETHANE	ND(1)	UG/G	CK	175 / 106
13V. DICHLORODIFLUOROMETHANE	ND(1)	UG/G	CK	175 / 106
14V. 1,1-DICHLOROETHANE	ND(1)	UG/G	CK	175 / 106
15V. 1,2-DICHLOROETHANE	ND(1)	UG/G	CK	175 / 106
16V. 1,1-DICHLOROETHYLENE	ND(1)	UG/G	CK	175 / 106
17V. 1,2-DICHLOROPROPANE	ND(1)	UG/G	CK	175 / 106
18V. 1,3-DICHLOROPROPYLENE	ND(1)	UG/G	CK	175 / 106
19V. ETHYLBENZENE	ND(1)	UG/G	CK	175 / 106

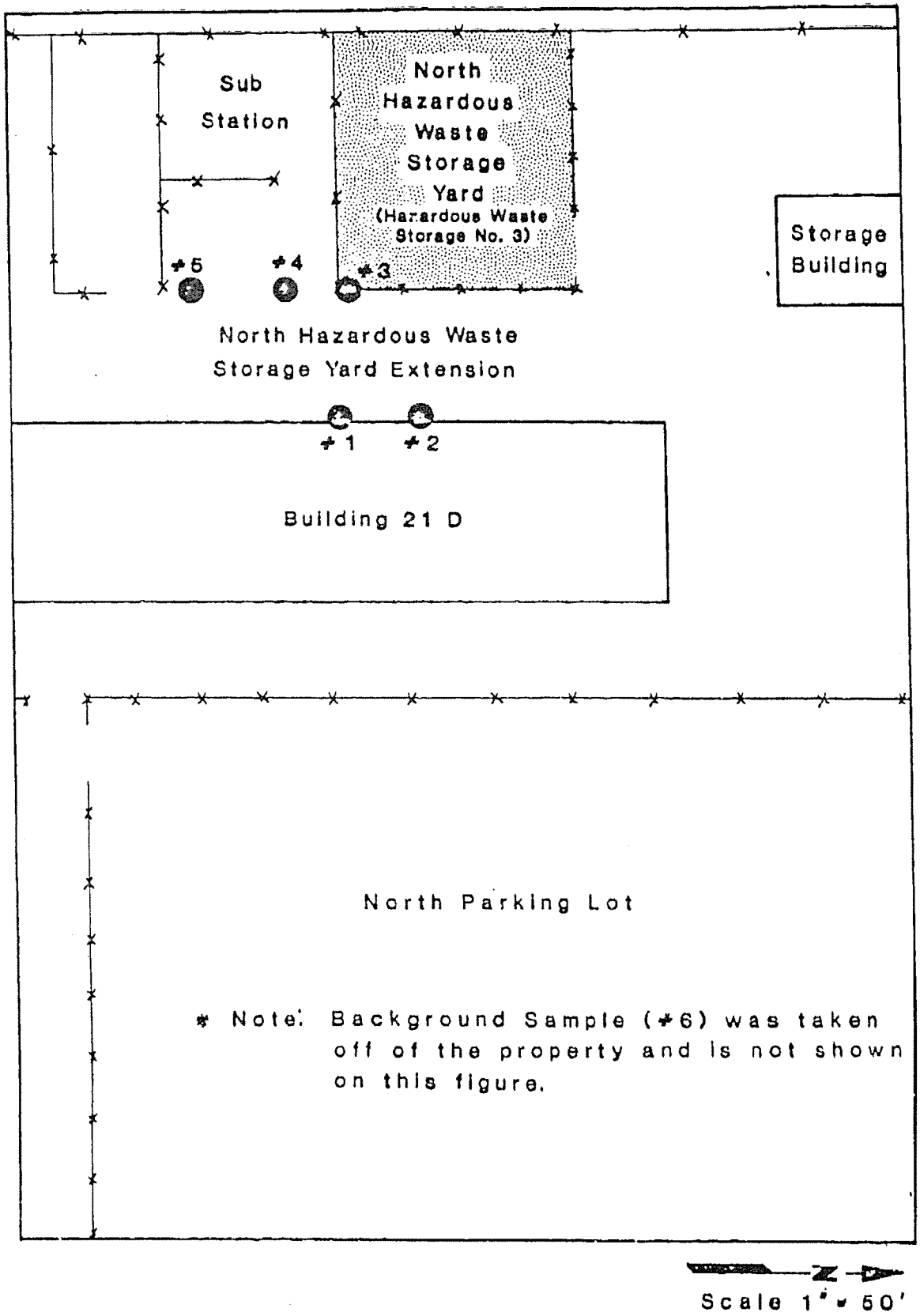


Figure C-2 Soil Samples Taken in the North Hazardous Waste Storage Yard Extension in June, 1982

WILSON LABORATORIES

528 NORTH NINTH STREET • P.O. BOX 1858 • SALINA, KANSAS 67401 • (913)825-71[illegible]

LABORATORY REPORT PAGE 1

CLIENT: GENERAL ELECTRIC
ATTN: JIM BAECHTEL
336 WOODWARD ROAD
ALBUQUERQUE, NM 87102

DATE RPTD.: 03/27/82
DATE RCVD.: 03/11/82
PURCHASE AUTHIZARA12597
FILE NO.: 81-9570

ANALYSIS	CONCENTRATION	UNITS	ANALYST	BOOK/PAGE
LAB NUMBER: 8203-0142 ORDER NUMBER: 2044 DATE SAMPLED: 03/10/82	SAMPLE DESCRIPTION: LOC. 42 35 FT X 48 IN SPECIAL INSTRUCTIONS: ANALYZED AS RECEIVED			
HYDROCARBONS, TOTAL --CONCLUSION--LAB NUMBER: 8203-0142	<10(1.0)	UG/G, DRY WT.	DEM	119 / 34
LAB NUMBER: 8203-0142D ORDER NUMBER: 2044	SAMPLE DESCRIPTION: LOC. 42 35 FT X 48 IN SPECIAL INSTRUCTIONS: ACID DIGESTION DATE PREP.: 03/18/82			
LEAD --CONCLUSION--LAB NUMBER: 8203-0142D	13.2	UG/G, WET WT.	BLD	178 / 31
LAB NUMBER: 8203-0143 ORDER NUMBER: 2044 DATE SAMPLED: 03/10/82	SAMPLE DESCRIPTION: LOC. 43 80 FT X 48 IN SPECIAL INSTRUCTIONS: ANALYZED AS RECEIVED			
HYDROCARBONS, TOTAL --CONCLUSION--LAB NUMBER: 8203-0143	<10(1.0)	UG/G, DRY WT.	DEM	119 / 34
LAB NUMBER: 8203-0143D ORDER NUMBER: 2044	SAMPLE DESCRIPTION: LOC. 43 80 FT X 48 IN SPECIAL INSTRUCTIONS: ACID DIGESTION DATE PREP.: 03/18/82			
LEAD --CONCLUSION--LAB NUMBER: 8203-0143D	4.9	UG/G, WET WT.	BTF	178 / 30
LAB NUMBER: 8203-0144 ORDER NUMBER: 2044 DATE SAMPLED: 03/10/82	SAMPLE DESCRIPTION: LOC 44 60 FT X 48 IN SPECIAL INSTRUCTIONS: ANALYZED AS RECEIVED			

WILSON LABORATORIES

LABORATORY REPORT

CLIENT:GENERAL ELECTRIC

DATE RPTD:03/29/82

ANALYSIS	CONCENTRATION	UNITS	ANALYST	BOOK/PAGE
HYDROCARBONS, TOTAL	ND(1.0)	UG/G, DRY WT.	DEM	119 / 34

--CONCLUSION--LAB NUMBER: 8203-0144

LAB NUMBER:8203-0144D
ORDER NUMBER:.2044
DATE SAMPLED: 03/10/82

SAMPLE DESCRIPTION:LOC 84 60 FT X 48 IN
SPECIAL INSTRUCTIONS:FILTER .45U, ANALYZE FILTRATE
DATE PREP.: 03/16/82

LEAD	6.6	UG/G, WET WT.	RLD	178 / 33

--CONCLUSION--LAB NUMBER: 8203-0144D

LAB NUMBER:8203-0145
ORDER NUMBER:.2044
DATE SAMPLED: 03/10/82

SAMPLE DESCRIPTION:LOC #5 230 FT X 12 IN
SPECIAL INSTRUCTIONS:ANALYZED AS RECEIVED

HYDROCARBONS, TOTAL	191.	UG/G, DRY WT.	DEM	119 / 34

--CONCLUSION--LAB NUMBER: 8203-0145

LAB NUMBER:8203-0145D
ORDER NUMBER:.2044

SAMPLE DESCRIPTION:LOC #5 230 FT X 12 IN
SPECIAL INSTRUCTIONS:ACID DIGESTION
DATE PREP.: 03/18/82

LEAD	13.6	UG/G, WET WT.	RLD	178 / 32

--CONCLUSION--LAB NUMBER: 8203-0145D

ND(), WHERE NOTED, INDICATES NONE DETECTED WITH THE DETECTION LIMIT IN PARENTHESES

ANALYSES WERE PERFORMED ON SAMPLES AS RECEIVED BY WILSON LABS UTILIZING APPROVED PROCEDURES PUBLISHED IN THE FEDERAL REGISTER, VOL. 44, NO. 233, DEC. 3, 1979 (67588-69575) AND AS AMENDED IN THE FED. REG., VOL. 44, NO. 244, DEC. 18, 1979.

WILSON LABORATORIES

Janis Butler

JANIS BUTLER, P.E.
LABORATORY DIRECTOR

APPENDIX C-3

ANALYTICAL RESULTS FOR THE SOIL SAMPLE TAKEN IN

THE NORTH PARKING LOT

Source: Closure Plan and Financial Requirements
for Interim Status Hazardous Waste Storage Facilities,
General Electric Co. Aircraft Engine Business Group
Albuquerque, NM Air Force Plant No. 83, August 1983

W I L S O N L A B O R A T O R I E S

528 NORTH NINTH STREET - P.O. BOX 1858 - SALINA, KANSAS 67401 - (913)825-7186

LABORATORY REPORT

CLIENT: GENERAL ELECTRIC
ATTN: JIM HESSE
336 WOODWARD ROAD
ALBUQUERQUE, NM 87102

DATE RPTD.: 03/11/83
DATE RCVD.: 02/11/83
PURCHASE AUTH: B12243
FILE NO.: 81-9570

LAB NUMBER: 8302-0130
ORDER NUMBER: .3767
DATE SAMPLED: 01/06/83

SAMPLE DESCRIPTION: SOIL SAMPLE
SPECIAL INSTRUCTIONS: ANALYZE AS RECEIVED
TIME SAMPLED: 1140

ANALYSIS	CONCENTRATION	UNITS	ANALYST	BOOK/PAGE
GC/MS VOLATILE COMPOUNDS				
1V. ACROLEIN	ND(1)	UG/G	CK	212 / 53
2V. ACRYLONITRILE	ND(1)	UG/G	CK	212 / 53
3V. BENZENE	ND(0.1)	UG/G	CK	212 / 53
4V. BIS(CHLOROMETHYL)ETHER	ND(0.1)	UG/G	CK	212 / 53
5V. BROMOFORM	ND(0.1)	UG/G	CK	212 / 53
6V. CARBON TETRACHLORIDE	ND(0.1)	UG/G	CK	212 / 53
7V. CHLOROBENZENE	ND(0.1)	UG/G	CK	212 / 53
8V. CHLORODIBROMOMETHANE	ND(0.1)	UG/G	CK	212 / 53
9V. CHLOROETHANE	ND(0.1)	UG/G	CK	212 / 53
10V. 2-CHLOROETHYLVINYL ETHER	ND(0.1)	UG/G	CK	212 / 53
11V. CHLOROFORM	ND(0.1)	UG/G	CK	212 / 53
12V. DICHLOROBROMOMETHANE	ND(0.1)	UG/G	CK	212 / 53
13V. DICHLORODIFLUOROMETHANE	ND(0.1)	UG/G	CK	212 / 53
14V. 1,1-DICHLOROETHANE	ND(0.1)	UG/G	CK	212 / 53
15V. 1,2-DICHLOROETHANE	ND(0.1)	UG/G	CK	212 / 53
16V. 1,1-DICHLOROETHYLENE	ND(0.1)	UG/G	CK	212 / 53
17V. 1,2-DICHLOROPROPANE	ND(0.1)	UG/G	CK	212 / 53
18V. 1,3-DICHLOROPROPYLENE	ND(0.1)	UG/G	CK	212 / 53
19V. ETHYLBENZENE	ND(0.1)	UG/G	CK	212 / 53
20V. METHYL BROMIDE	ND(0.1)	UG/G	CK	212 / 53
21V. METHYL CHLORIDE	ND(0.1)	UG/G	CK	212 / 53
22V. METHYLENE CHLORIDE	ND(0.1)	UG/G	CK	212 / 53
23V. 1,1,2,2-TETRACHLOROETHANE	ND(0.1)	UG/G	CK	212 / 53
24V. TETRACHLOROETHYLENE	ND(0.1)	UG/G	CK	212 / 53
25V. TOLUENE	ND(0.1)	UG/G	CK	212 / 53
26V. 1,2-TRANSDICHLOROETHYLENE	ND(0.1)	UG/G	CK	212 / 53
27V. 1,1,1-TRICHLOROETHANE	ND(0.1)	UG/G	CK	212 / 53
28V. 1,1,2-TRICHLOROETHANE	ND(0.1)	UG/G	CK	212 / 53
29V. TRICHLOROETHYLENE	ND(0.1)	UG/G	CK	212 / 53
30V. TRICHLOROFLUOROMETHANE	ND(0.1)	UG/G	CK	212 / 53
31V. VINYL CHLORIDE	ND(0.1)	UG/G	CK	212 / 53

--CONCLUSION--LAB NUMBER: 8302-0130

WILSON LABORATORIES

LABORATORY REPORT

CLIENT:GENERAL ELECTRIC

DATE RPTD.:03/11/83

ANALYSIS	CONCENTRATION	UNITS	ANALYST	BOOK/PAGE
LAB NUMBER:8302-0130E	SAMPLE DESCRIPTION:SOIL SAMPLE			
ORDER NUMBER:.3767	SPECIAL INSTRUCTIONS:EP TOXICITY			
DATE SAMPLED: 01/06/83	TIME SAMPLED: 1140		DATE PREP.: 02/22/83	
ARSENIC	0.11	MG/L	BTF	222 / 13
BARIUM	0.65	MG/L	DEM	225 / 16
CADMIUM	0.01	MG/L	BTF	192 / 66
CHROMIUM, TOTAL	ND(0.05)	MG/L	BTF	192 / 67
LEAD	0.1	MG/L	BTF	192 / 67
MERCURY	ND(0.01)	MG/L	MJB	224 / 7
SELENIUM	ND(0.001)	MG/L	BTF	222 / 14
SILVER	ND(0.01)	MG/L	BTF	192 / 67

--CONCLUSION--LAB NUMBER: 8302-0130E

LAB NUMBER:8302-0131 SAMPLE DESCRIPTION:WASTE TRIMSOL

ORDER NUMBER:.3767 SPECIAL INSTRUCTIONS:ANALYZE AS RECEIVED

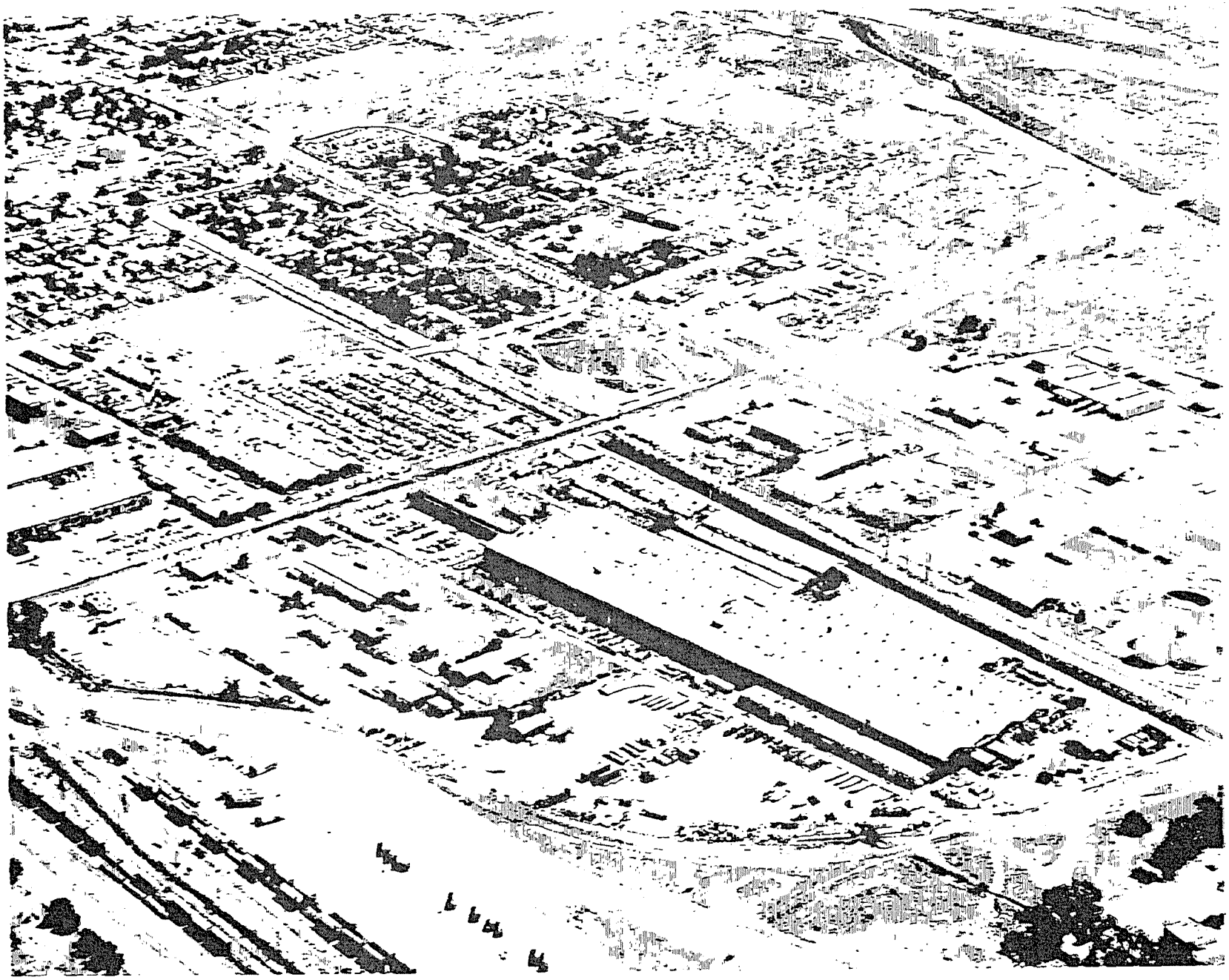
DATE SAMPLED: 02/09/83

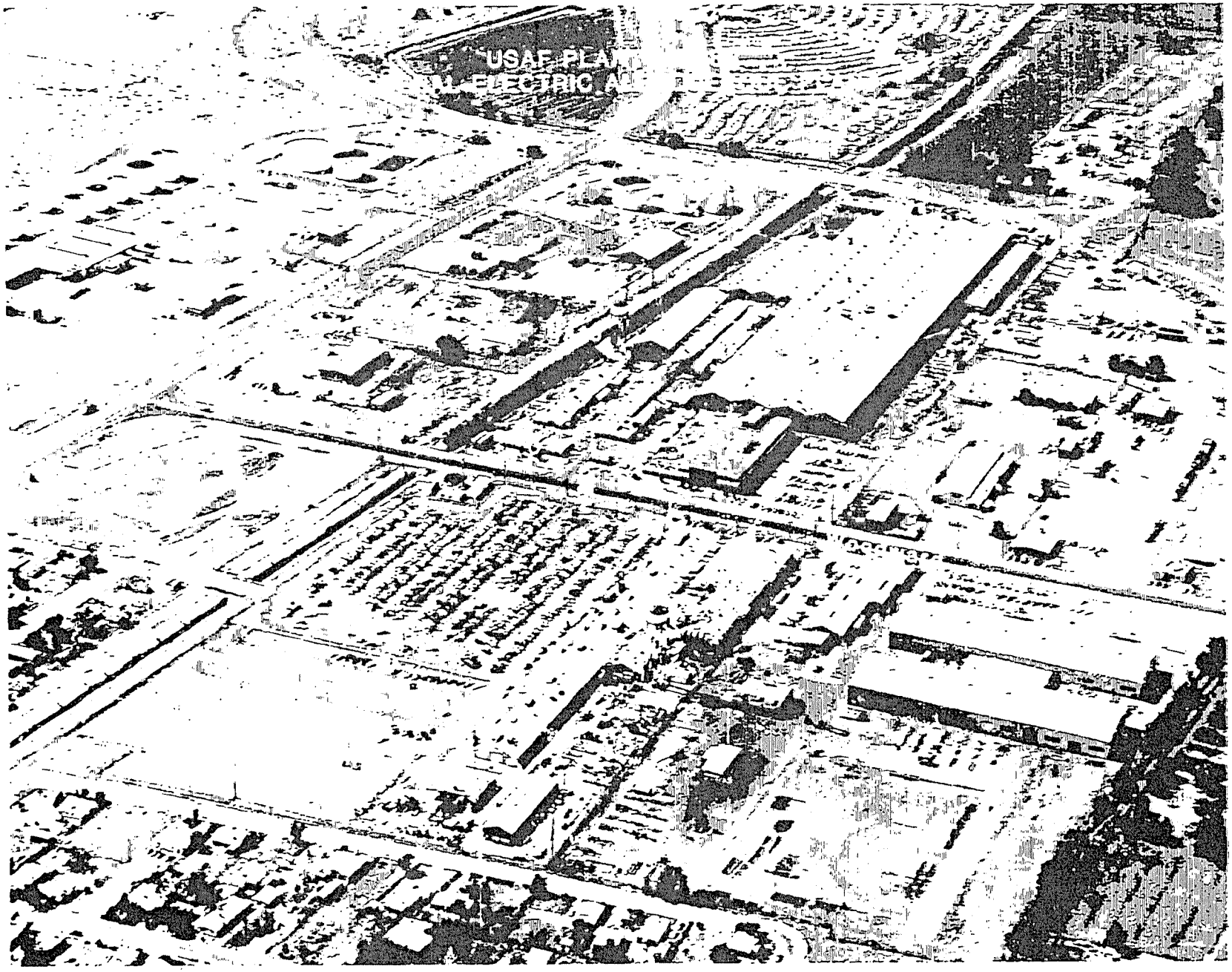
GC/MS VOLATILE COMPOUNDS

1V. ACROLEIN	ND(10)	MG/L	CK	212 / 53
2V. ACRYLONITRILE	ND(10)	MG/L	CK	212 / 53
3V. BENZENE	ND(1)	MG/L	CK	212 / 53
4V. BIS(CHLOROMETHYL)ETHER	ND(1)	MG/L	CK	212 / 53
5V. BROMOFORM	ND(1)	MG/L	CK	212 / 53
6V. CARBON TETRACHLORIDE	37.	MG/L	CK	212 / 53
7V. CHLOROBENZENE	ND(1)	MG/L	CK	212 / 53
8V. CHLORODIBROMOMETHANE	ND(1)	MG/L	CK	212 / 53
9V. CHLOROETHANE	ND(1)	MG/L	CK	212 / 53
10V. 2-CHLOROETHYLVINYL ETHER	ND(1)	MG/L	CK	212 / 53
11V. CHLOROFORM	ND(1)	MG/L	CK	212 / 53
12V. DICHLOROBROMOMETHANE	ND(1)	MG/L	CK	212 / 53
13V. DICHLORODIFLUOROMETHANE	ND(1)	MG/L	CK	212 / 53
14V. 1,1-DICHLOROETHANE	ND(1)	MG/L	CK	212 / 53
15V. 1,2-DICHLOROETHANE	ND(1)	MG/L	CK	212 / 53
16V. 1,1-DICHLOROETHYLENE	2.	MG/L	CK	212 / 53
17V. 1,2-DICHLOROPROPANE	ND(1)	MG/L	CK	212 / 53
18V. 1,3-DICHLOROPROPYLENE	ND(1)	MG/L	CK	212 / 53
19V. ETHYLBENZENE	ND(1)	MG/L	CK	212 / 53
20V. METHYL BROMIDE	ND(1)	MG/L	CK	212 / 53
21V. METHYL CHLORIDE	ND(1)	MG/L	CK	212 / 53
22V. METHYLENE CHLORIDE	ND(1)	MG/L	CK	212 / 53
23V. 1,1,2,2-TETRACHLOROETHANE	ND(1)	MG/L	CK	212 / 53
24V. TETRACHLOROETHYLENE	ND(1)	MG/L	CK	212 / 53
25V. TOLUENE	ND(1)	MG/L	CK	212 / 53

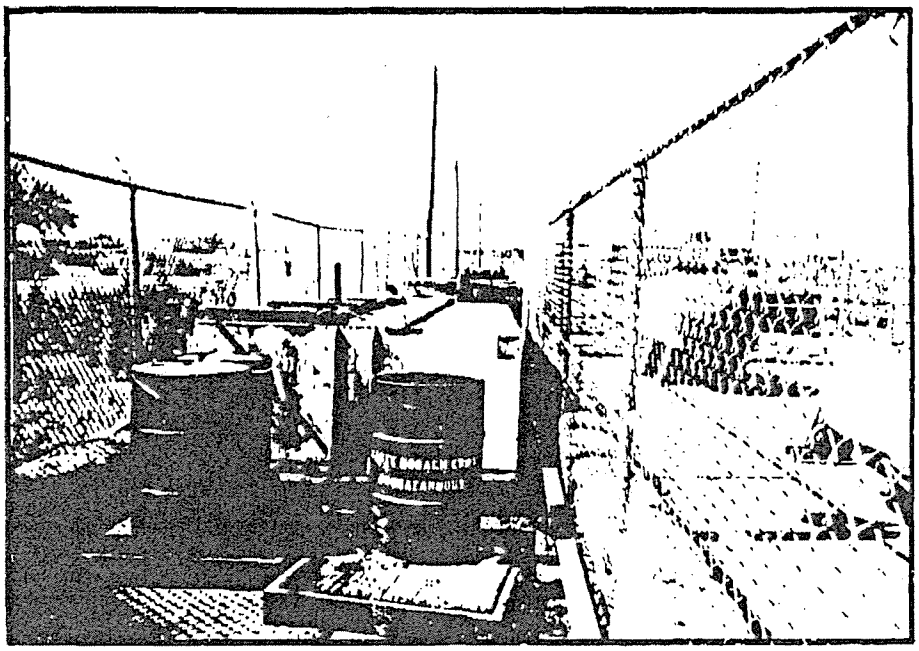
APPENDIX D

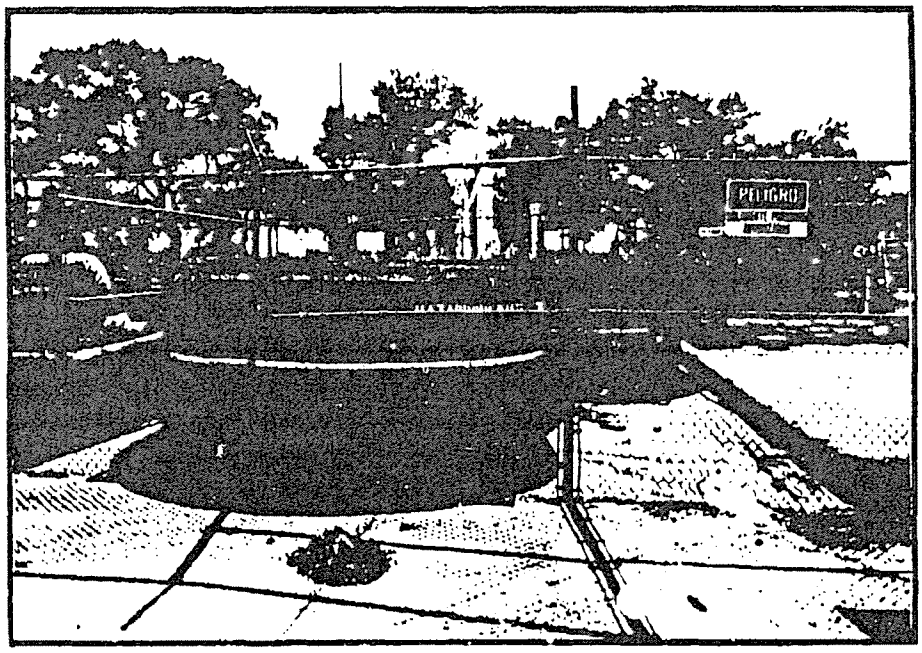
PHOTOGRAPHS




USAF PLA
ELECTRIC A

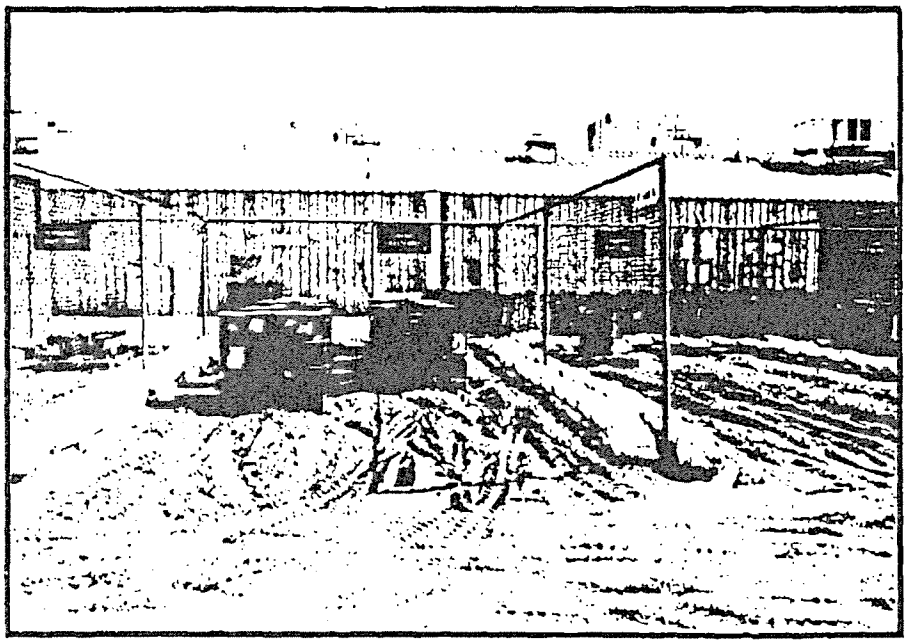
USAF PLANT NO. 33
GENERAL ELECTRIC ALBUQUERQUE PLANT

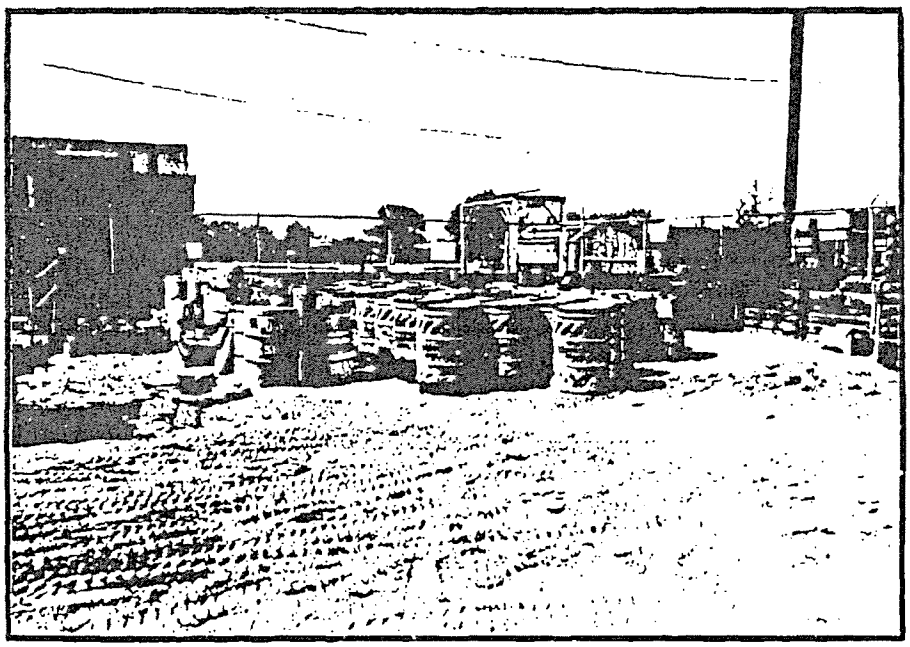




Hazardous Waste Storage Area No. 1

USAF PLANT NO. 83
GENERAL ELECTRIC ALBUQUERQUE PLANT





Hazardous Waste Storage Area No. 3

APPENDIX E

USAF INSTALLATION RESTORATION PROGRAM

HAZARD ASSESSMENT RATING METHODOLOGY

APPENDIX E

USAF INSTALLATION RESTORATION PROGRAM
HAZARD ASSESSMENT RATING METHODOLOGY

BACKGROUND

The Department of Defense (DOD) has established a comprehensive program to identify, evaluate, and control problems associated with past disposal practices at DOD facilities. One of the actions required under this program is to:

> "develop and maintain a priority listing of contaminated installations and facilities for remedial action based on potential hazard to public health, welfare, and environmental impacts." (Reference: DEQPPM 81-5, aa December 1981).

Accordingly, the United States Air Force (USAF) has sought to establish a system to set priorities for taking further actions at sites based upon information gathered during the Secords Search phase of its Installation Restoration Program (IRP).

The first site rating model was developed in June 1981 at a meeting with represenatives from USAF Occupational and Environmental Health Laboratory (OEHL), Air Force Engineering and Services Center (AFESC), Engineering-Science (ES) and CH2M Hill. The basis for this model was a system developed for EPA by JRB Associates of McLean, Virginia. The JRB model was modified to meet Air Force needs.

After using this model for 6 months at over 20 Air Force installations, certain inadequacies became apparent. Therefore, on January 26 and 27, 1982, representatives of USAF OEHL, AFESC, various major commands, Engineering-Science, and CH2M Hill met to address the inadequacies. The result of the meeting was a new site rating model designed to present a better picture of the hazards posed by sites at Air Force installations. The new rating model described in this presentation is referred to as the Hazard Assessment Rating Methodology.

PURPOSE

The purpose of the site rating model is to provide a relative ranking of sites of suspected contamination from hazardous substances. This model will assist the Air Force in setting priorities for follow-on site investigations and confirmation work under Phase II of the IRP.

This rating system is used only after it has been determined that (1) potential for contamination exists (hazardous waste present in sufficient quantity), and (2) potential for migration exists. A site can be deleted from consideration for rating on either basis.

DESCRIPTION OF MODEL

Like the other hazardous waste site ranking models, the U.S. Air Force's site rating model uses a scoring system to rank sites for priority attention. However, in developing this model, the designers incorporated some special features to meet specific DOD program needs.

The model uses data readily obtained during the Records Search portion (Phase I) of the IRP. Scoring judgments and computations are easily made. In assessing the hazards at a given site, the model develops a score based on the most likely routes of contamination and the worst hazards at the site. Sites are given low scores only if there are clearly no hazards at the site. This approach meshes well with the policy for evaluating and setting restrictions on excess DOD properties.

As with the previous model, this model considers four aspects of the hazard posed by a specific site: the possible receptors of the contamination, the waste and its characteristics, potential pathways for waste contaminant migration, and any efforts to contain the contaminants. Each of these categories contains a number of rating factors that are used in the overall hazard rating.

The receptors category rating is calculated by scoring each factor, multiplying by a factor weighting constant and adding the weighted scores to obtain a total category score.

The pathways category rating is based on evidence of contaminant migration or an evaluation of the highest potential (worst case) for contaminant migration along one of three pathways. If evidence of contaminant migration exists, the category is given a subscore of 80 to 100 points. For indirect evidence, 80 points are assigned and for direct evidence, 100 points are assigned. If no evidence is found, the highest score among three possible routes is used. These routes are surface water migration, flooding, and ground-water migration. Evaluation of each route involves factors associated with the particular migration route. The three pathways are evaluated and the highest score among all four of the potential scores is used.

The waste characteristics category is scored in three steps. First, a point rating is assigned based on an assessment of the waste quantity and the hazard (worst case) associated with the site. The level of confidence in the information is also factored into the assessment. Next, the score is multiplied by a waste persistence factor, which acts to reduce the score if the waste is not very persistent. Finally, the score is further modified by the physical state of the waste. Liquid wastes receive the maximum score, while scores for sludges and solids are reduced.

The scores for each of the three categories are then added together and normalized to a maximum possible score of 100. Then the waste management practice category is scored. Sites at which there is no containment are not reduced in score. Scores for sites with limited containment can be reduced by 5 percent. If a site is contained and well managed, its score can be reduced by 90 percent. The final site score is calculated by applying the waste management practices category factor to the sum of the scores for the other three categories.

HAZARD ASSESSMENT RATING METHODOLOGY FLOW CHART

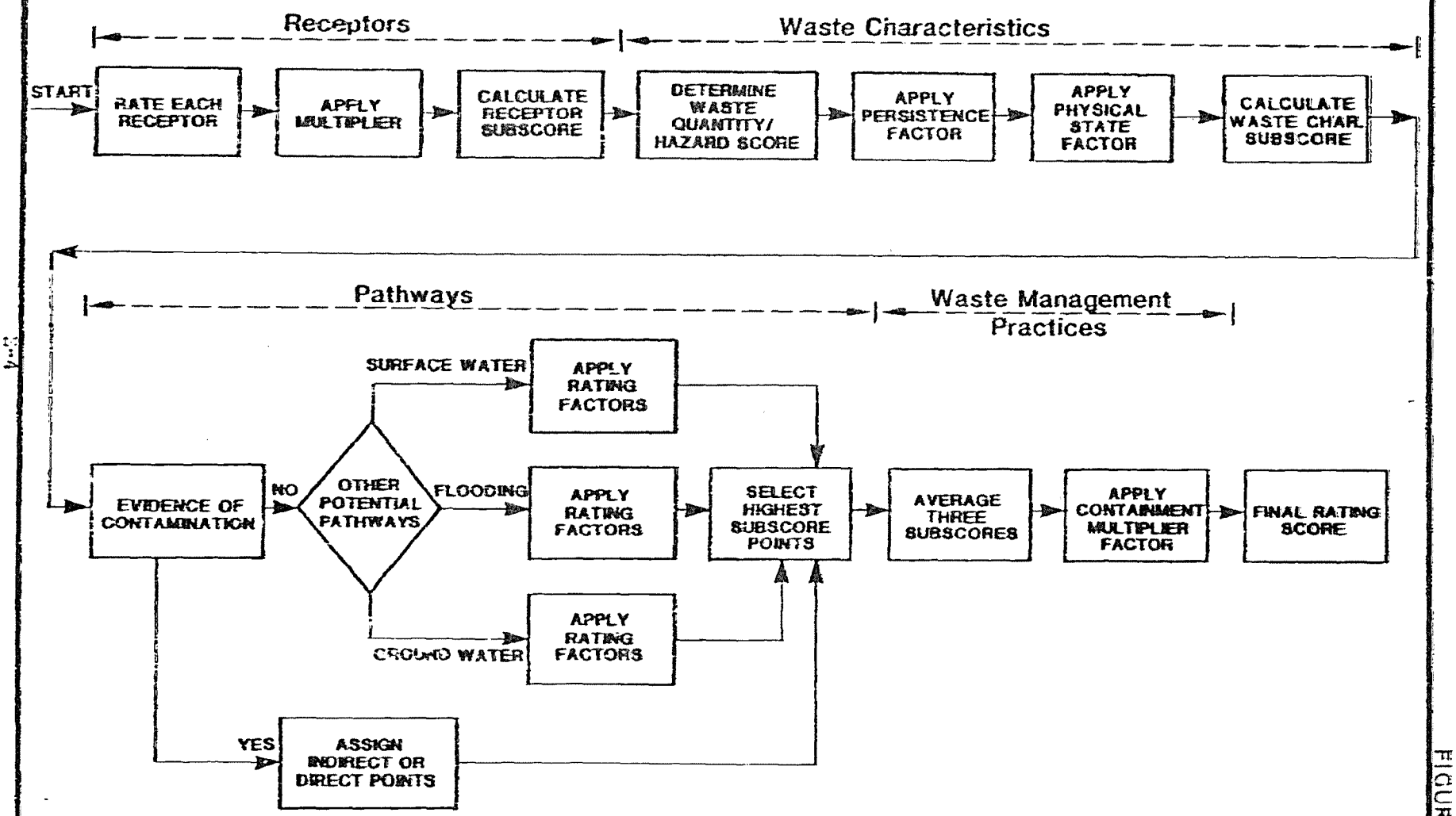


FIGURE 1

FIGURE 2

HAZARD ASSESSMENT RATING METHODOLOGY FORM

NAME OF SITE _____

LOCATION _____

DATE OF OPERATION OR OCCURRENCE _____

OWNER/OPERATOR _____

COMMENTS/DESCRIPTION _____

SITE RATED BY _____

I. RECEPTORS

Rating factor	Factor Rating (0-3)	Multiplier	Factor Score	Maximum Possible Score
A. Population within 1,000 feet of site		4		
B. Distance to nearest well		10		
C. Land use/zoning within 1 mile radius		3		
D. Distance to reservation boundary		6		
E. Critical environments within 1 mile radius of site		10		
F. Water quality of nearest surface water body		6		
G. Ground water use of uppermost aquifer		9		
H. Population served by surface water supply within 3 miles downstream of site		6		
I. Population served by ground-water supply within 3 miles of site		6		
		Subtotals	_____	_____

Receptors subscore (100 X factor score subtotal/maximum score subtotal) _____

II. WASTE CHARACTERISTICS

A. Select the factor score based on the estimated quantity, the degree of hazard, and the confidence level of the information.

1. Waste quantity (S = small, M = medium, L = large) _____
2. Confidence level (C = confirmed, S = suspected) _____
3. Hazard rating (H = high, M = medium, L = low) _____

Factor Subscore A (from 20 to 100 based on factor score matrix) _____

B. Apply persistence factor
Factor Subscore A X Persistence Factor = Subscore B

_____ X _____ = _____

C. Apply physical state multiplier

Subscore B X Physical State Multiplier = Waste Characteristics Subscore

_____ X _____ = _____

FIGURE 2 (Continued)

III. PATHWAYS

Rating Factor	Factor Rating (0-3)	Multiplier	Factor Score	Maximum Possible Score

A. If there is evidence of migration of hazardous contaminants, assign maximum factor subscore of 100 points for direct evidence or 80 points for indirect evidence. If direct evidence exists then proceed to C. If no evidence or indirect evidence exists, proceed to B.

Subscore _____

B. Rate the migration potential for 3 potential pathways: surface water migration, flooding, and ground-water migration. Select the highest rating, and proceed to C.

1. Surface water migration

Distance to nearest surface water		8		
Net precipitation		6		
Surface erosion		8		
Surface permeability		6		
Rainfall intensity		8		
		Subtotals	_____	_____

Subscore (100 X factor score subtotal/maximum score subtotal) _____

2. Flooding

		1		

Subscore (100 x factor score/3) _____

3. Ground-water migration

Depth to ground water		8		
Net precipitation		6		
Soil permeability		8		
Subsurface flows		8		
Direct access to ground water		8		
		Subtotals	_____	_____

Subscore (100 x factor score subtotal/maximum score subtotal) _____

C. Highest pathway subscore.

Enter the highest subscore value from A, B-1, B-2 or B-3 above.

Pathways Subscore _____

IV. WASTE MANAGEMENT PRACTICES

A. Average the three subscores for receptors, waste characteristics, and pathways.

Receptors _____
Waste Characteristics _____
Pathways _____

Total _____ divided by 3 = _____ Gross Total Score

B. Apply factor for waste containment from waste management practices

Gross Total Score X Waste Management Practices Factor = Final Score

_____ X _____ = _____

TABLE 1

HAZARD ASSESSMENT RATING METHODOLOGY GUIDELINES

I. RECEPTORS CATEGORY

Rating Factors	Rating Scale Levels 0	1	2	3	Mult'plier
A. Population within 1,000 feet (includes on-base facilities)	0	1 - 25	26 - 100	Greater than 100	4
B. Distance to nearest water well	Greater than 3 miles	1 to 3 miles	3,001 feet to 1 mile	0 to 3,000 feet	10
C. Land Use/Zoning (within 1 mile radius)	Completely remote (zoning not applicable)	Agricultural	Commercial or industrial	Residential	3
D. Distance to installation boundary	Greater than 2 miles	1 to 2 miles	1,001 feet to 1 mile	0 to 1,000 feet	6
E. Critical environments (within 1 mile radius)	Not a critical environment	Natural areas	Pristine natural areas; minor wetlands; preserved areas; presence of economically important natural resources susceptible to contamination.	Major habitat of an endangered or threatened species; presence of recharge area; major wetlands.	10
F. Water quality/use designation of nearest surface water body	Agricultural or industrial use.	Recreation, propagation and management of fish and wildlife.	Shellfish propagation and harvesting.	Potable water supplies	6
G. Ground-Water use of uppermost aquifer	Not used, other sources readily available.	Commercial, industrial, or irrigation, very limited other water sources.	Drinking water, municipal water available.	Drinking water, no municipal water available; commercial, industrial, or irrigation, no other water source available.	9
H. Population served by surface water supplies within 3 miles downstream of site	0	1 - 50	51 - 1,000	Greater than 1,000	6
I. Population served by aquifer supplies within 3 miles of site	0	1 - 50	51 - 1,000	Greater than 1, 000	6

TABLE 1 (Continued)

HAZARD ASSESSMENT RATING METHODOLOGY GUIDELINES

II. WASTE CHARACTERISTICS

A-1 Hazardous Waste Quantity

S = Small quantity (<5 tons or 20 drums of liquid)
M = Moderate quantity (5 to 20 tons or 21 to 85 drums of liquid)
L = Large quantity (>20 tons or 85 drums of liquid)

A-2 Confidence Level of Information

C = Confirmed confidence level (minimum criteria below)

- o Verbal reports from interviewer (at least 2) or written information from the records.
- o Knowledge of types and quantities of wastes generated by shops and other areas on base.
- o Based on the above, a determination of the types and quantities of waste disposed of at the site.

S = Suspected confidence level

- o No verbal reports or conflicting verbal reports and no written information from the records.
- o Logic based on a knowledge of the types and quantities of hazardous wastes generated at the base, and a history of past waste disposal practices indicate that these wastes were disposed of at a site.

A-3 Hazard Rating

Hazard Category	Rating Scale Levels 0	1	2	3
Toxicity	Sax's Level 0	Sax's Level 1	Sax's Level 2	Sax's Level 3
Ignitability	Flash point greater than 200°F	Flash point at 140°F to 200°F	Flash point at 80°F to 140°F	Flash point less than 80°F
Radioactivity	At or below background levels	1 to 3 times background levels	3 to 5 times background levels	Over 5 times background levels

Use the highest individual rating based on toxicity, ignitability and radioactivity and determine the hazard rating.

Hazard Rating	Points
High (H)	3
Medium (M)	2
Low (L)	1

TABLE 1 (Continued)

HAZARD ASSESSMENT RATING METHODOLOGY GUIDELINES

II. WASTE CHARACTERISTICS (Continued)

Waste Characteristics Matrix

Point Rating	Hazardous Waste Quantity	Confidence Level of Information	Hazard Rating
100	L	C	H
80	L	C	M
	M	C	H
70	L	S	H
60	S	C	H
	M	C	M
50	L	S	M
	L	C	L
	M	S	H
	S	C	M
40	S	S	H
	M	S	M
	M	C	L
	L	S	L
30	S	C	L
	M	S	L
	S	S	M
20	S	S	L

Notes:
For a site with more than one hazardous waste, the waste quantities may be added using the following rules:
Confidence Level
- o Confirmed confidence levels (C) can be added
- o Suspected confidence levels (S) can be added
- o Confirmed confidence levels cannot be added with suspected confidence levels

Waste Hazard Rating
- o Wastes with the same hazard rating can be added
- o Wastes with different hazard ratings can only be added in a downgrade mode, e.g., MCM + SCH = LCM if the total quantity is greater than 20 tons.

Example: Several wastes may be present at a site, each having an MCM designation (60 points). By adding the quantities of each waste, the designation may change to LCM (80 points). In this case, the correct point rating for the waste is 80.

B. Persistence Multiplier for Point Rating

Persistence Criteria	Multiply Point Rating From Part A by the Following
Metals, polycyclic compounds, and halogenated hydrocarbons	1.0
Substituted and other ring compounds	0.9
Straight chain hydrocarbons	0.8
Easily biodegradable compounds	0.4

C. Physical State Multiplier

Physical State	Multiply Point Total From Parts A and B by the Following
Liquid	1.0
Sludge	0.75
Solid	0.50

TABLE 1 (Continued)

HAZARD ASSESSMENT RATING METHODOLOGY GUIDELINES

III. PATHWAYS CATEGORY

A. Evidence of Contamination

Direct evidence is obtained from laboratory analyses of hazardous contaminants present above natural background levels in surface water, ground water, or air. Evidence should confirm that the source of contamination is the site being evaluated.

Indirect evidence might be from visual observation (i.e., leachate), vegetation stress, sludge deposits, presence of taste and odors in drinking water, or reported discharges that cannot be directly confirmed as resulting from the site, but the site is greatly suspected of being a source of contamination.

B-1 POTENTIAL FOR SURFACE WATER CONTAMINATION

Rating Factor	Rating Scale Levels 0	1	2	3	Multiplier
Distance to nearest surface water (includes drainage ditches and storm sewers)	Greater than 1 mile	2,001 feet to 1 mile	501 feet to 2,000 feet	0 to 500 feet	8
Net precipitation	Less than -10 in.	-10 to + 5 in.	+5 to +20 in.	Greater than +20 in.	6
Surface erosion	None	Slight	Moderate	Severe	8
Surface permeability	0% to 15% clay ($>10^{-2}$ cm/sec)	15% to 30% clay (10^{-2} to 10^{-4} cm/sec)	30% to 50% clay (10^{-4} to 10^{-6} cm/sec)	Greater than 50% clay ($<10^{-6}$ cm/sec)	6
Rainfall intensity based on 1 year 24-hr rainfall	<1.0 inch	1.0-2.0 inches	2.1-3.0 inches	>3.0 inches	8
B-2 POTENTIAL FOR FLOODING					
Floodplain	Beyond 100-year floodplain	In 25-year flood-plain	In 10-year flood-plain	Floods annually	1
B-3 POTENTIAL FOR GROUND-WATER CONTAMINATION					
Depth to ground water	Greater than 500 ft	50 to 500 feet	11 to 50 feet	0 to 10 feet	8
Net precipitation	Less than -10 in.	-10 to +5 in.	+5 to +20 in.	Greater than +20 in.	6
Soil permeability	Greater than 50% clay ($>10^{-6}$ cm/sec)	30% to 50% clay (10^{-4} to 10^{-6} cm/sec)	15% to 30% clay (10^{-2} to 10^{-4} cm/sec)	0% to 15% clay ($<10^{-2}$ cm/sec)	8
Subsurface flows	Bottom of site greater than 5 feet above high ground-water level	Bottom of site occasionally submerged	Bottom of site frequently submerged	Bottom of site located below mean ground-water level	8
Direct access to ground water (through faults, fractures, faulty well casings, subsidence fissures, etc.)	No evidence of risk	Low risk	Moderate risk	High risk	8

TABLE 1 (Continued)

HAZARD ASSESSMENT RATING METHODOLOGY GUIDELINES

IV. WASTE MANAGEMENT PRACTICES CATEGORY

A. This category adjusts the total risk as determined from the receptors, pathways, and waste characteristics categories for waste management practices and engineering controls designed to reduce this risk. The total risk is determined by first averaging the receptors, pathways, and waste characteristics subscores.

B. WASTE MANAGEMENT PRACTICES FACTOR

The following multipliers are then applied to the total risk points (from A):

Waste Management Practice	Multiplier
No containment	1.0
Limited containment	0.95
Fully contained and in full compliance	0.10

Guidelines for fully contained:

Landfills:

- o Clay cap or other impermeable cover
- o Leachate collection system
- o Liners in good condition
- o Adequate monitoring wells

Surface Impoundments:

- o Liners in good condition
- o Sound dikes and adequate freeboard
- o Adequate monitoring wells

Spills:

- o Quick spill cleanup action taken
- o Contaminated soil removed
- o Soil and/or water samples confirm total cleanup of the spill

Fire Proection Training Areas:

- o Concrete surface and berms
- o Oil/water separator for pretreatment of runoff
- o Effluent from oil/water separator to treatment plant

General Note: If data are not available or known to be complete the factor ratings under items I-A through I, III-B-1 or III-B-3, then leave blank for calculation of factor score and maximum possible score.

APPENDIX F

HAZARDOUS ASSESSMENT SITE RATING FORMS

TABLE OF CONTENTS

HAZARD ASSESSMENT RATING METHODOLOGY FORMS

PLANT NO. 83

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3.	Hazardous Waste Storage No. 3	60	F-5
4.	Hazardous Waste Storage No. 4	54	F-7
5.	Underground Cyanide Vault	51	F-9

HAZARD ASSESSMENT RATING METHODOLOGY FORM

Name of Site: North Parking Lot
Location: North end of plant
Date of Operation or Occurrence: 1979 - 1980
Owner/Operator: USAF
Comments/Description: Contaminated oils sprayed on bare earth lot for dust control

Site Rated by: Mark Spiegel, Dan Harman

I. RECEPTORS

Rating Factor	Factor Rating (0-3)	Multi-plier	Factor Score	Maximum Possible Score
A. Population within 1,000 feet of site	3	4	12	12
B. Distance to nearest well	3	10	30	30
C. Land use/zoning within 1 mile radius	3	3	9	9
D. Distance to reservation boundary	3	6	18	18
E. Critical environments within 1 mile radius of site	3	10	30	30
F. Water quality of nearest surface water body	0	6	0	18
G. Ground water use of uppermost aquifer	3	9	27	27
H. Population served by surface water supply within 3 miles downstream of site	0	6	0	18
I. Population served by ground-water supply within 3 miles of site	3	6	18	18
Subtotals			144	180

Receptors subscore (100 x factor score subtotal/maximum score subtotal) 80

II. WASTE CHARACTERISTICS

A. Select the factor score based on the estimated quantity, the degree of hazard, and the confidence level of the information.

1. Waste quantity (1=small, 2=medium, 3=large) 3
2. Confidence level (1=confirmed, 2=suspected) 1
3. Hazard rating (1=low, 2=medium, 3=high) 2

Factor Subscore A (from 20 to 100 based on factor score matrix) 80

B. Apply persistence factor
Factor Subscore A x Persistence Factor = Subscore B

80 x 1.00 = 80

C. Apply physical state multiplier
Subscore B x Physical State Multiplier = Waste Characteristics Subscore

80 x 1.00 = 80

III. PATHWAYS

A. If there is evidence of migration of hazardous contaminants, assign maximum factor subscore of 100 points for direct evidence or 80 points for indirect evidence. If direct evidence exists then proceed to C. If no evidence or indirect evidence exists, proceed to B.

Subscore 0

B. Rate the migration potential for 3 potential pathways: surface water migration, flooding, and ground-water migration. Select the highest rating and proceed to C.

Rating Factor	Factor Rating (0-3)	Multi-plier	Factor Score	Maximum Possible Score
1. Surface Water Migration				
Distance to nearest surface water	3	8	24	24
Net precipitation	0	6	0	18
Surface erosion	0	8	0	24
Surface permeability	2	6	12	18
Rainfall intensity	1	8	8	24
Subtotals			44	108
Subscore (100 x factor score subtotal/maximum score subtotal)				41
2. Flooding	0	1	0	3
Subscore (100 x factor score/3)				0
3. Ground-water migration				
Depth to ground water	2	8	16	24
Net precipitation	0	6	0	18
Soil permeability	1	8	8	24
Subsurface flows	0	8	0	24
Direct access to ground water	0	8	0	24
Subtotals			24	114
Subscore (100 x factor score subtotal/maximum score subtotal)				21

C. Highest pathway subscore.
Enter the highest subscore value from A, B-1, B-2 or B-3 above.

Pathways Subscore 41

IV. WASTE MANAGEMENT PRACTICES

A. Average the three subscores for receptors, waste characteristics, and pathways.

Receptors	80	
Waste Characteristics	80	
Pathways	41	
Total	201 divided by 3 =	67 Gross total score

B. Apply factor for waste containment from waste management practices.
Gross total score x waste management practices factor = final score

67 x 0.95 = \ 64 \ FINAL SCORE

HAZARD ASSESSMENT RATING METHODOLOGY FORM

Name of Site: Hazardous Waste Storage No. 1
Location: South boundary of plant
Date of Operation or Occurrence: 1954 - Present
Owner/Operator: USAF
Comments/Description: Used to store waste chemicals and oils

Site Rated by: Mark Spiegel, Dan Harman

I. RECEPTORS

Rating Factor	Factor Rating (0-3)	Multi-plier	Factor Score	Maximum Possible Score
A. Population within 1,000 feet of site	3	4	12	12
B. Distance to nearest well	3	10	30	30
C. Land use/zoning within 1 mile radius	3	3	9	9
D. Distance to reservation boundary	3	6	18	18
E. Critical environments within 1 mile radius of site	3	10	30	30
F. Water quality of nearest surface water body	0	6	0	18
G. Ground water use of uppermost aquifer	3	9	27	27
H. Population served by surface water supply within 3 miles downstream of site	0	6	0	18
I. Population served by ground-water supply within 3 miles of site	3	6	18	18
Subtotals			144	180

Receptors subscore (100 x factor score subtotal/maximum score subtotal) 80

II. WASTE CHARACTERISTICS

A. Select the factor score based on the estimated quantity, the degree of hazard, and the confidence level of the information.

1. Waste quantity (1=small, 2=medium, 3=large) 1
2. Confidence level (1=confirmed, 2=suspected) 1
3. Hazard rating (1=low, 2=medium, 3=high) 3

Factor Subscore A (from 20 to 100 based on factor score matrix) 60

B. Apply persistence factor
Factor Subscore A x Persistence Factor = Subscore B

60 x 1.00 = 60

C. Apply physical state multiplier
Subscore B x Physical State Multiplier = Waste Characteristics Subscore

60 x 1.00 = 60

III. PATHWAYS

A. If there is evidence of migration of hazardous contaminants, assign maximum factor subscore of 100 points for direct evidence or 80 points for indirect evidence. If direct evidence exists then proceed to C. If no evidence or indirect evidence exists, proceed to B.

Subscore 0

B. Rate the migration potential for 3 potential pathways: surface water migration, flooding, and ground-water migration. Select the highest rating and proceed to C.

Rating Factor	Factor Rating (0-3)	Multi-plier	Factor Score	Maximum Possible Score
1. Surface Water Migration				
Distance to nearest surface water	3	8	24	24
Net precipitation	0	6	0	18
Surface erosion	0	8	0	24
Surface permeability	3	6	18	18
Rainfall intensity	1	8	8	24
Subtotals			50	108
Subscore (100 x factor score subtotal/maximum score subtotal)				46
2. Flooding	0	1	0	3
Subscore (100 x factor score/3)				0
3. Ground-water migration				
Depth to ground water	2	8	16	24
Net precipitation	0	6	0	18
Soil permeability	0	8	0	24
Subsurface flows	0	8	0	24
Direct access to ground water	0	8	0	24
Subtotals			16	114
Subscore (100 x factor score subtotal/maximum score subtotal)				14

C. Highest pathway subscore.
Enter the highest subscore value from A, B-1, B-2 or B-3 above.

Pathways Subscore 46

IV. WASTE MANAGEMENT PRACTICES

A. Average the three subscores for receptors, waste characteristics, and pathways.

Receptors	80	
Waste Characteristics	68	
Pathways	46	
Total	194 divided by 3 =	62 Gross total score

B. Apply factor for waste containment from waste management practices.
Gross total score x waste management practices factor = final score

62 x 1.00 = 62

FINAL SCORE

HAZARD ASSESSMENT RATING METHODOLOGY FORM

Name of Site: Hazardous Waste Storage No. 3
Location: North end of plant between Buildings 21 and 30
Date of Operation or Occurrence: Late 1950's to Present
Owner/Operator: USAF
Comments/Description: Used to store chemical wastes

Site Rated by: Mark Spiegel, Dan Harman

I. RECEPTORS

Rating Factor	Factor Rating (0-3)	Multi-plier	Factor Score	Maximum Possible Score
A. Population within 1,000 feet of site	3	4	12	12
B. Distance to nearest well	3	10	30	30
C. Land use/zoning within 1 mile radius	3	3	9	9
D. Distance to reservation boundary	3	6	18	18
E. Critical environments within 1 mile radius of site	3	10	30	30
F. Water quality of nearest surface water body	0	6	0	18
G. Ground water use of uppermost aquifer	3	9	27	27
H. Population served by surface water supply within 3 miles downstream of site	0	6	0	18
I. Population served by ground-water supply within 3 miles of site	3	6	18	18
Subtotals			144	180

Receptors subscore (100 x factor score subtotal/maximum score subtotal) 80

II. WASTE CHARACTERISTICS

A. Select the factor score based on the estimated quantity, the degree of hazard, and the confidence level of the information.

1. Waste quantity (1=small, 2=medium, 3=large) 1
2. Confidence level (1=confirmed, 2=suspected) 1
3. Hazard rating (1=low, 2=medium, 3=high) 3

Factor Subscore A (from 29 to 100 based on factor score matrix) 60

B. Apply persistence factor
Factor Subscore A x Persistence Factor = Subscore B

60 x 1.00 = 60

C. Apply physical state multiplier
Subscore B x Physical State Multiplier = Waste Characteristics Subscore

60 x 1.00 = 60

III. PATHWAYS

A. If there is evidence of migration of hazardous contaminants, assign maximum factor subscore of 100 points for direct evidence or 80 points for indirect evidence. If direct evidence exists then proceed to C. If no evidence or indirect evidence exists, proceed to B.

Subscore 0

B. Rate the migration potential for 3 potential pathways: surface water migration, flooding, and ground-water migration. Select the highest rating and proceed to C.

Rating Factor	Factor Rating (0-3)	Multi-plier	Factor Score	Maximum Possible Score
1. Surface Water Migration				
Distance to nearest surface water	3	8	24	24
Net precipitation	0	6	0	18
Surface erosion	1	8	8	24
Surface permeability	2	6	12	18
Rainfall intensity	1	8	8	24
Subtotals			52	108
Subscore (100 x factor score subtotal/maximum score subtotal)				48
2. Flooding	0	1	0	3
Subscore (100 x factor score/3)				0
3. Ground-water migration				
Depth to ground water	2	8	16	24
Net precipitation	0	6	0	18
Soil permeability	1	8	8	24
Subsurface flows	0	8	0	24
Direct access to ground water	0	8	0	24
Subtotals			24	114
Subscore (100 x factor score subtotal/maximum score subtotal)				21

C. Highest pathway subscore.
Enter the highest subscore value from A, B-1, B-2 or B-3 above.

Pathways Subscore 41

IV. WASTE MANAGEMENT PRACTICES

A. Average the three subscores for receptors, waste characteristics, and pathways.

Receptors	80	
Waste Characteristics	60	
Pathways	41	
Total	181 divided by 3 =	60 Gross total score

B. Apply factor for waste containment from waste management practices.
Gross total score x waste management practices factor = final score

60 x 1.00 = \ 60 \
FINAL SCORE

HAZARD ASSESSMENT RATING METHODOLOGY FORM

Name of Site: Hazardous Waste Storage No. 4
Location: Parking lot east of Building No. 30, North end of plant
Date of Operation or Occurrence: 1970's to 1981
Owner/Operator: USAF
Comments/Description: Used for storage of waste 1,1,1 trichloroethane and Freon

Site Rated by: Mark Spigel, Dan Harman

I. RECEPTORS

Rating Factor	Factor Rating (0-3)	Multi-plier	Factor Score	Maximum Possible Score
A. Population within 1,000 feet of site	3	4	12	12
B. Distance to nearest well	3	10	30	30
C. Land use/zoning within 1 mile radius	3	3	9	9
D. Distance to reservation boundary	3	6	18	18
E. Critical environments within 1 mile radius of site	3	10	30	30
F. Water quality of nearest surface water body	0	6	0	18
G. Ground water use of uppermost aquifer	3	9	27	27
H. Population served by surface water supply within 3 miles downstream of site	0	6	0	18
I. Population served by ground-water supply within 3 miles of site	3	6	18	18
Subtotals			144	180

Receptors subscore (100 x factor score subtotal/maximum score subtotal) 80

II. WASTE CHARACTERISTICS

A. Select the factor score based on the estimated quantity, the degree of hazard, and the confidence level of the information.

1. Waste quantity (1=small, 2=medium, 3=large) 1
2. Confidence level (1=confirmed, 2=suspected) 1
3. Hazard rating (1=low, 2=medium, 3=high) 3

Factor Subscore A (from 20 to 100 based on factor score matrix) 50

B. Apply persistence factor
Factor Subscore A x Persistence Factor = Subscore B

50 x 1.00 = 50

C. Apply physical state multiplier
Subscore B x Physical State Multiplier = Waste Characteristics Subscore

50 x 1.00 = 50

III. PATHWAYS

A. If there is evidence of migration of hazardous contaminants, assign maximum factor subscore of 100 points for direct evidence or 80 points for indirect evidence. If direct evidence exists then proceed to C. If no evidence or indirect evidence exists, proceed to B.

Subscore 0

B. Rate the migration potential for 3 potential pathways: surface water migration, flooding, and ground-water migration. Select the highest rating and proceed to C.

Rating Factor	Factor Rating (0-3)	Multi-plier	Factor Score	Maximum Possible Score
1. Surface Water Migration				
Distance to nearest surface water	3	8	24	24
Net precipitation	0	6	0	18
Surface erosion	0	8	0	24
Surface permeability	2	6	12	18
Rainfall intensity	1	8	8	24
Subtotals			44	108
Subscore (100 x factor score subtotal/maximum score subtotal)				41
2. Flooding	0	1	0	3
Subscore (100 x factor score/3)				0
3. Ground-water migration				
Depth to ground water	2	8	16	24
Net precipitation	0	6	0	18
Soil permeability	1	8	8	24
Subsurface flows	0	8	0	24
Direct access to ground water	0	8	0	24
Subtotals			24	114
Subscore (100 x factor score subtotal/maximum score subtotal)				21

C. Highest pathway subscore.
Enter the highest subscore value from A, B-1, B-2 or B-3 above.

Pathways Subscore 41

IV. WASTE MANAGEMENT PRACTICES

A. Average the three subscores for receptors, waste characteristics, and pathways.

Receptors		80
Waste Characteristics		50
Pathways		41
Total	171 divided by 3 =	57 Gross total score

B. Apply factor for waste containment from waste management practices.
Gross total score x waste management practices factor = final score

57 x 0.95 = 54 FINAL SCORE

HAZARD ASSESSMENT RATING METHODOLOGY FORM

Name of Site: Underground Cyanide Vault
Location: East of Building No. 7
Date of Operation or Occurrence: Mid 1950's to late 1970's
Owner/Operator: USAF
Comments/Description: used to collect spilled plating waste

Site Rated by: Mark Spiegel, Dan Harman

I. RECEPTORS

Rating Factor	Factor Rating (0-3)	Multi-plier	Factor Score	Maximum Possible Score
A. Population within 1,000 feet of site	3	4	12	12
B. Distance to nearest well	3	10	30	30
C. Land use/zoning within 1 mile radius	3	3	9	9
D. Distance to reservation boundary	3	6	18	18
E. Critical environments within 1 mile radius of site	3	10	30	30
F. Water quality of nearest surface water body	0	6	0	18
G. Ground water use of uppermost aquifer		9	27	27
H. Population served by surface water supply within 3 miles downstream of site	0	6	0	18
I. Population served by ground-water supply within 3 miles of site	3	6	18	18
Subtotals			144	180

Receptors subscore (100 x factor score subtotal/maximum score subtotal) 80

II. WASTE CHARACTERISTICS

A. Select the factor score based on the estimated quantity, the degree of hazard, and the confidence level of the information.

1. Waste quantity (1=small, 2=medium, 3=large) 1
2. Confidence level (1=confirmed, 2=suspected) 1
3. Hazard rating (1=low, 2=medium, 3=high) 3

Factor Subscore A (from 20 to 100 based on factor score matrix) 40

B. Apply persistence factor
Factor Subscore A x Persistence Factor = Subscore B

40 x 1.00 = 40

C. Apply physical state multiplier
Subscore B x Physical State Multiplier = Waste Characteristics Subscore

40 x 1.00 = 40

III. PATHWAYS

A. If there is evidence of migration of hazardous contaminants, assign maximum factor subscore of 100 points for direct evidence or 80 points for indirect evidence. If direct evidence exists then proceed to C. If no evidence or indirect evidence exists, proceed to B.

Subscore 0

B. Rate the migration potential for 3 potential pathways: surface water migration, flooding, and ground-water migration. Select the highest rating and proceed to C.

Rating Factor	Factor Rating (0-3)	Multi-plier	Factor Score	Maximum Possible Score
1. Surface Water Migration				
Distance to nearest surface water	3	8	24	24
Net precipitation	0	6	0	18
Surface erosion	0	8	0	24
Surface permeability	2	6	12	18
Rainfall intensity	1	8	8	24
Subtotals			44	108
Subscore (100 x factor score subtotal/maximum score subtotal)				41
2. Flooding	0	1	0	3
Subscore (100 x factor score/3)				0
3. Ground-water migration				
Depth to ground water	2	8	16	24
Net precipitation	0	6	0	18
Soil permeability	1	8	8	24
Subsurface flows	0	8	0	24
Direct access to ground water	1	8	8	24
Subtotals			32	114
Subscore (100 x factor score subtotal/maximum score subtotal)				28

C. Highest pathway subscore.
Enter the highest subscore value from A, B-1, B-2 or B-3 above.

Pathways Subscore 41

IV. WASTE MANAGEMENT PRACTICES

A. Average the three subscores for receptors, waste characteristics, and pathways.

Receptors	80	
Waste Characteristics	40	
Pathways	41	
Total	161 divided by 3 =	54 Gross total score

B. Apply factor for waste containment from waste management practices.
Gross total score x waste management practices factor = final score

54 x 0.95 = \ 51 \
FINAL SCORE

APPENDIX G

REFERENCES

APPENDIX G
REFERENCES

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APPENDIX H

GLOSSARY OF TERMINOLOGY AND ABBREVIATIONS

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GLOSSARY OF TERMINOLOGY AND ABBREVIATIONS

ACF: American Car and Foundary, Incorporated

AF: Air Force.

AFESC: Air Force Engineering and Services Center.

Ag: Chemical symbol for silver.

Al: Chemical symbol for aluminum.

ALLUVIUM: Materials eroded, transported and deposited by streams.

ALLUVIAL FAN: A fan-shaped deposit formed by a stream either where it issues from a narrow mountain valley into a plain or broad valley, or where a tributary stream joins a main stream.

ALODINE 1200: Alumigold Tinco Mil L-5541.

ARTESIAN: Ground water contained under hydrostatic pressure.

ASD/PMD: Aeronautical Systems Division, Directorate of Manufacturing.

AQUIFER: A geologic formation, group of formations, or part of a formation that is capable of yielding water to a well or spring.

AROMATIC: Description of organic chemical compounds in which the carbon atoms are arranged into a ring with special electron stability associated. Aromatic compounds are often more reactive than non-aromatics.

Ba: Chemical symbol for barium.

BIOACCUMULATE: Tendency of elements or compounds to accumulate or build up in the tissues of living organisms when they are exposed to these elements in their environments, e.g., heavy metals.

BIODEGRADABLE: The characteristic of a substance to be broken down from complex t simple compounds by microorganisms.

$CaCO_3$: Chemical symbol for calcium carbonate.

CAYTUR 21: Methleyene Dianaline.

Cd: Chemical symbol for cadmium.

CERCLA: Comprehensive Environmental Response, Compensation and Liability Act.

CIRCA: About; used to indicate an approximate date.

CLOSURE: The completion of a set of rigidly defined functions for a hazardous waste facility no longer in operation.

CN: Chemical symbol for cyanide.

COD: Chemical Oxygen Demand, a measure of the amount of oxygen required to oxidize organic and oxidizable inorganic compounds in water.

COE: Corps of Engineers.

CONFINED AQUIFER: An aquifer bounded above and below by impermeable strata or by geologic units of distinctly lower permeability than that of the aquifer itself.

CONFINING UNIT: An aquitard or other poorly permeable layer which restricts the movement of ground water.

CONTAMINATION: The degradation of natural water quality to the extent that its usefulness is impaired; there is no implication of any specific limits since the degree of permissible contamination depends upon the intended end use or uses of the water.

COOLANT: Lubricant used during machining and cutting processes (e.g., Simcool, Trimsol).

Cr: Chemical symbol for chromium.

Cu: Chemical symbol for copper.

DCAS: Defense Contract Administration Services

DIP: The angle at which a stratum is inclined from the horizontal.

DISPOSAL FACILITY: A facility or part of a facility at which hazardous waste is intentionally placed into or on land or water, and at which waste will remain after closure.

DISPOSAL OF HAZARDOUS WASTE: The discharge, deposit, injection, dumping, spilling, or placing of any hazardous waste into or on land or water so that such waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground water.

DOD: Department of Defense.

DOE: U. S. Department of Energy.

DOW 17 ANODIZE: Sandia Spec 400104, Anodizing Magnesium.

DOWNGRADIENT: In the direction of decreasing hydraulic static head; the direction in which ground water flows.

EDM OIL: Electrical discharge machining oil.

EFFLUENT: A liquid waste discharge from a manufacturing or treatment process, in its natural state, or partially or completely treated, that discharges into the environment.

EP: Extraction Procedure, the EPA's standard laboratory procedure for leachate generation.

EPA: U.S. Environmental Protection Agency.

EPHEMERAL AQUIFER: A water-bearing zone typically located near the surface which normally contains water seasonally.

EROSION: The wearing away of land surface by wind, water, or chemical processes.

ES: Engineering-Science, Inc.

EXTRACTION PROCEDURE TOXICITY METALS: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium and Silver

FACILITY: Any land and appurtenances thereon and thereto used for the treatment, storage and/or disposal of hazardous wastes.

FAULT: A fracture in rock along which the adjacent rock surfaces are differentially displaced.

Fe: Chemical symbol for iron.

FLOOD PLAIN: The lowland and relatively flat areas adjoining inland and coastal areas of the mainland and off-shore islands, including, at a minimum, areas subject to a one percent or greater chance of flooding in any given year.

FLOW PATH: The direction of movement of ground water as governed principally by the hydraulic gradient.

GC/MS: Gas chromatograph/mass spectrophotometer, a laboratory procedure for identifying unknown compounds.

GE: General Electric Company

GROUND WATER: Water beneath the land surface in the saturated zone that is under atmospheric or artesian pressure.

GROUND WATER RESERVOIR: The earth materials and the intervening open spaces that contain ground water.

HALOGEN: The class of chemical elements including fluorine, chlorine, bromine, and iodine.

HARDFILL: Disposal sites receiving construction debris, wood, miscellaneous spoil material.

HARM: Hazard Assessment Rating Methodology.

HAZARDOUS SUBSTANCE: Under CERCLA, the definition of hazardous substance includes:

1. All substances regulated under Paragraphs 311 and 307 of the Clean Water Act (except oil);

2. All substances regulated under Paragraph 3001 of the Solid Waste Disposal Act;

3. All substances regulated under Paragraph 112 of the Clean Air Act;

4. All substances which the Administrator of EPA has acted against under Paragraph 7 of the Toxic Substance Control Act;

5. Additional substances designated under Paragraph 102 of the Superfund bill.

HAZARDOUS WASTE: As defined in RCRA, a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical or infectious characteristics may cause or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating reversible illness; or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

HAZARDOUS WASTE GENERATION: The act or process of producing a hazardous waste.

HEAVY METALS: Metallic elements, including the transition series, which include many elements required for plant and animal nutrition in trace concentrations but which become toxic at higher concentrations.

Hg: Chemical symbol for mercury.

HWMF: Hazardous Waste Management Facility.

HYDROCARBONS: Organic chemical compounds composed of hydrogen and carbon atoms chemically bonded. Hydrocarbons may be straight chain, cyclic, branched chain, aromatic, or polycyclic, depending upon arrangement of carbon atoms. Halogentated hydrocarbons are hydrocarbons in which one or more hydrogen atoms has been replaced by a halogen atom.

INCOMPATIBLE WASTE: A waste unsuitable for commingling with another waste or material because the commingling might result in generation of extreme heat or pressure, explosion or violent reaction, fire, formation of substances which are shock sensitive, friction sensitive, or otherwise have the potential for reacting violently, formation of toxic dusts, mists, fumes, and gases, volatilization of ignitable or toxic chemicals due to heat generation in such a manner that the likelihood of contamination of ground water or escape of the substance into the environment is increased, any other reaction which might result in not meeting the air, human health, and environmental standards.

INFILTRATION: The movement of water through the soil surface into the ground.

IRIDITE #1: Chromate solution.

IRP: Installation Restoration Program.

LEACHATE: A solution resulting from the separation or dissolving of soluble or particulate constituents from solid waste or other man-placed medium by percolation of water.

LEACHING: The process by which soluble materials in the soil, such as nutrients, pesticide chemicals or contaminants, are washed into a lower layer of soil or are dissolved and carried away by water.

LINER: A continous layer of natural or man-made materials beneath or on the sides of a surface impoundment, landfill, or landfill cell which restricts the downward or lateral escape of hazardous waste, hazardous waste constituents or leachate.

LITHOLOGY: The description of the physical character of a rock.

LYSIMETER: A vacuum operated sampling device used for extracting pore water samples at various depths within the unsaturated zone.

MGD: Million Gallons per Day.

Mn: Chemical symbol for manganese.

MONITORING WELL: A well used to measure ground-water levels and to obtain samples.

MS 123: Freon solution.

MSL: Mean Sea Level.

NDI: Non-destructive Inspection.

NET PRECIPITATION: The amount of annual precipitation minus annual evaporation.

NGVD: National Geodetic Vertical Datum of 1929.

Ni: Chemical symbol for nickel.

NMEID: New Mexico Environmental Improvement Division

NMHED: New Mexico Health and Environment Department

NMWQCC: New Mexico Water Quality Control Commission

NOAA: National Oceanic and Atmospheric Administration.

NPDES: National Pollutant Discharge Elimination System.

OEHL: Occupational and Environmental Health Laboratory.

ORGANIC: Being, containing or relating to carbon compounds, especially in which hydrogen is attached to carbon.

O&G: Symbols for oil and grease.

Pb: Chemical symbol for lead.

PCB: Polychlorinated Biphenyl; liquids used as a dielectrics in electrical equipment.

PERCOLATION: Movement of moisture by gravity or hydrostatic pressure through interstices of unsaturated rock or soil.

PERMEABILITY: The capacity of a porous rock, soil or sediment for transmitting a fluid without damage to the structure of the medium.

PERSISTENCE: As applied to chemicals, those which are very stable and remain in the enviornment in their original form for an extended period of time.

pH: Negative logarithm of hydrogen ion concentration.

POLLUTANT: Any introduced gas, liquid or solid that makes a rescurce unfit for a specific purpose.

POLYCYCLIC COMPOUND: All compounds in which carbon atoms are arranged into two or more rings, usually aromatic in nature.

POTENTIALLY ACTIVE FAULT: A fault along which movement has occurred within the last 25-million years.

POTENTIOMETRIC SURFACE: The surface to which water in an aquifer would rise through tightly cased wells open only to the aquifer.

PPB: Parts per billion by weight.

PPM: Parts per million by weight.

PRECIPITATION: Rainfall.

QUATERNARY MATERIALS: The second period of the Cenozoic geologic era, following the Tertiary, and including the last 2-3 million years.

RCRA: Resource Conservation and Recovery Act.

RECEPTORS: The potential impact group or resource for a waste contamination source.

RECHARGE AREA: A surface area in which surface water or precipitation percolates through the unsaturated zone and eventually reaches the zone of saturation. Recharge areas may be natural or manmade.

RECHARGE: The addition of water to the ground-water system by natural or artificial processes.

SANITARY LANDFILL: A land disposal site using an engineered method of disposing solid wastes on land in a way that minimizes environmental hazards.

SATURATED ZONE: That part of the earth's crust in which all voids are filled with water.

SAX'S TOXICITY: A rating method for evaluating the toxicity of chemical materials.

SCS: U.S. Department of Agriculture Soil Conservation Service.

SEISMICITY: Pertaining to earthquakes or earth vibrations.

SIMCOOL: Water base coolant.

SLUDGE: Any garbage, refuse, or slude from a waste treatment plant, water supply treatment, or air pollution control facility and other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining, or agricultural operations and from community activities, but does not include solid or dissolved materials in domestic sewage; solid or dissolved materials in irrigation return flows; industrial discharges which are point source subject to permits under Section 402 of the Federal Water Pollution Control Act, as amended (86 USC 880); or source, special nuclear, or by-product material as defined by the Atomic Energy Act of 1954 (68 USC 923).

SMUT-GO: Chromate nitric acid solution.

SOLID WASTE: Any garbage, refuse, or sludge from a waste treatment plant, water supply treatment, or air pollution control facility and other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining, or agricultural operations and from community activities, but does not include solid or dissolved materials in domestic sewage; solid or dissolved materials in irrigation return flows; industrial discharges which are point source subject to permits under Section 402 of the Federal Water Pollution Control Act, as amended (86 USC 880); or source, special nuclear, or by-product material as defined by the Atomic Energy Act of 1954 (68 USC 923).

SPILL: Any unplanned release or discharge of a hazardous waste onto or into the air, land, or water.

STORAGE OF HAZARDOUS WASTE: Containment, either on a temporary basis or for a longer period, in such a manner as not to constitute disposal of such hazardous waste.

TCE: Trichloroethylene.

TDS: Total Dissolved Solid, a water quality parameter.

TOC: Total Organic Carbon.

TOXICITY: The ability of a material to produce injury or disease upon exposure, ingestion, inhalation, or assimilation by a living organism.

TRANSMISSIVITY: The rate at which water is transmitted through a unit width of aquifer under a unit hydraulic gradient.

TREATMENT OF HAZARDOUS WASTE: Any method, technique, or process including neutralization designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize the waste or so as to render the waste nonhazardous.

TRIMSOL: Water base coolant.

TSD: Treatment, storage or disposal.

TUCO 4409: Amonium bifluoride.

TURCO ARR: Alkaline rust remover, 88-95% NaOH

TURCO AVIATION: Trisodium phosphate.

UPGRADIENT: In the direction of increasing hydraulic static head; the direction opposite to the prevailing flow of ground-water.

USAF: United States Air Force.

USDA: United States Department of Agriculture

USFWS: United States Fish and Wildlife Service.

USGS: United States Geological Survey.

WATER TABLE: Surface of a body of unconfined ground water at which the pressure is equal to that of the atmosphere.

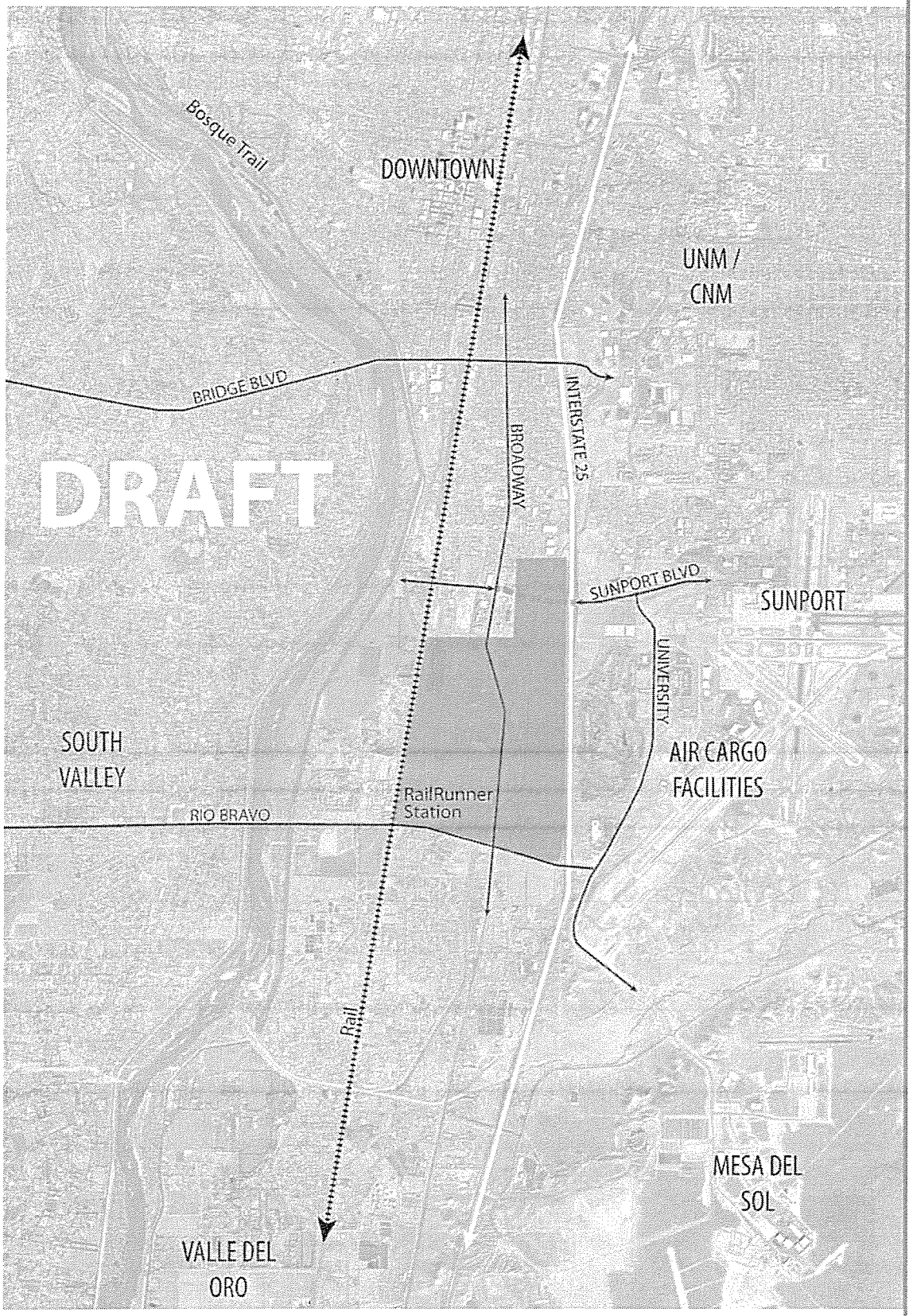
Zn: Chemical symbol for ~~zinc.~~

APPENDIX

B

CONTENTS:

1. Sunport Commerce Center Design Overlay



SUNPORT COMMERCE CENTER

Design Overlay

January 31, 2014

The Sunport Commerce Center Design Overlay was prepared by:

Dekker/Perich/Sabatini

architecture interiors landscape planning engineering

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01 INTRODUCTION

Purpose

The purpose of the Sunport Commerce Center Design Overlay (Design Overlay) is to positively influence development patterns in an effort to shape and enhance the character and identity of the area. The Design Overlay applies to all parcels that lie between 2nd Street to the west, Woodward Road and Sunport Boulevard to the north, Interstate 25 to the east, and Río Bravo Boulevard to the south (See Exhibit A on the following page). Zoning will continue to be regulated by the Bernalillo County zoning ordinance. This is an addendum to the Bernalillo County/International Sunport Station Area Sector Development Plan, whose boundary is shown in Exhibit A on the following page.

The Design Overlay works in tandem with the existing zoning designations which specify allowable land uses and basic design parameters. The Design Overlay provides more detailed requirements for site, building, parking, and landscape standards which will also be used by Bernalillo County for plan reviews. The set of straightforward design standards have been developed to assist owners, builders, architects, and designers in the preparation of building plans for development. The intent is to provide direction and establish a baseline of design that will result in a more attractive and cohesive built environment. Done correctly, the Design Overlay will reduce the scale and frequency of detrimental uses that impact the overall community, encourage new economic activity, and elevate the overall image and identity of the area. Its strategic location, adjacent to the railroad, Interstate 25, as well as the Sunport cargo facilities, makes the area well situated to capitalize on manufacturing, warehousing, and distribution.

Design Overlay Goals

The design standards of the Design Overlay are meant to inform development in a way that enhances the image and character of the area along with the following goals:

1. Physically reinforce the identity and character of the South Valley, the nearby Rio Grande bosque, and Valle Del Oro National Wildlife Refuge.
2. Strengthen existing communities through revitalization by increasing economic activity and generating new jobs for area residents.
3. Establish Sunport Commerce Center as a primary gateway to the South Valley.
4. Foster the Commerce Center's design to reflect the setting between the agricultural lands of the Rio Grande valley and the international commerce of the urbanized region.
5. Strengthen connectivity within the Design Overlay zone area and to adjacent areas.
6. Promote sustainable development through the recruitment of clean industry as well as the use of best practices in the design of landscape and the built environment.

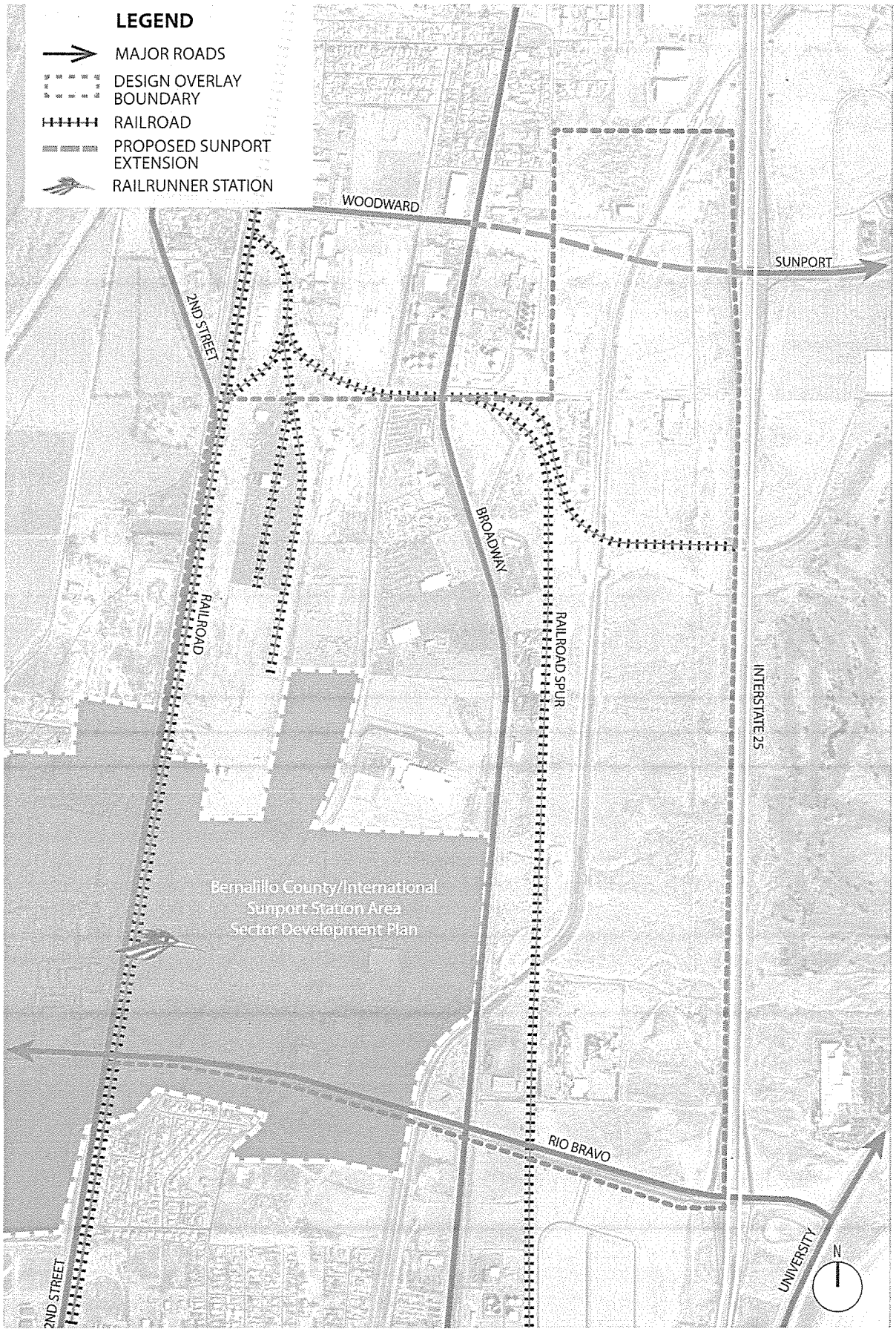


Exhibit A: Sunport Commerce Center Design Overlay boundary and context boundary and general context.

02 PROCESS

Submittals

Applicants will follow standard County requirements and procedures for site plan approvals. In addition, applicants will be required to provide the following information:

1. Color samples of base, trim, and accent colors.
2. Specifications for proposed exterior lighting.
3. Short narrative explaining how proposed development meets design overlay standards.

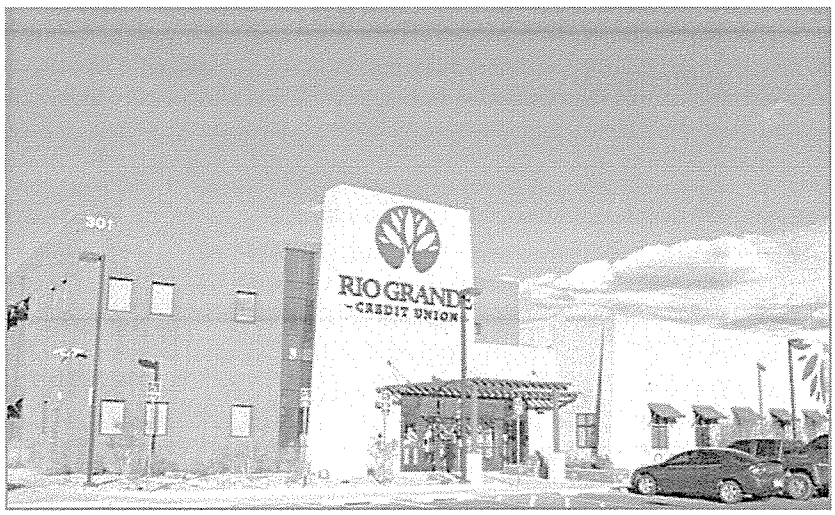
A checklist at the end of this document summarizes the elements that need to be addressed.

Implementation

Thresholds for application: Any addition to a building or structure that is 1,000 square feet or greater and all new development shall trigger compliance with the Sunport Commerce Center Design Overlay. Any project that requires a zone change or a Special Use Permit is also subject to these requirements. Additions greater than 20 percent of existing square footage will need to comply with landscape and signage requirements.

Utilizing the existing land use framework, the standards and guidelines address the following four design elements:

- circulation and access,
- area standards,
- architectural character, and
- site development.



03 STANDARDS + GUIDELINES

CIRCULATION + ACCESS

Streets

Access and circulation should create an interconnected street network to provide a safe environment for all types of users. Currently, the Sunport Commerce Center area is predominantly undeveloped and roadways are built to only serve motorists. As the area develops, safer mobility infrastructure will become increasingly necessary, particularly within the Sunport RailRunner Station area. A complete streets concept design approach is intended to facilitate this process. Complete streets are designed and maintained to allow for safe usage by all users, including pedestrians, bicyclists, transit, and motorists.

The area is made up of three roadway types including principle arterials, minor arterials, and collectors. Broadway is catergorized as a principle arterial. Principle arterials are roadways that are meant to carry high traffic volumes and accommodate trips leaving and entering urban areas. It should be noted that while Broadway is a principle arterial; its serves a significantly lower number of daily trips than its categorization suggests. There is significant opportunity for a complete street approach and possible lane reductions along this segment of the arterial. On the other hand, minor arterials interconnect and support higher service roads and sometimes carry local transit service. 2nd Street is catergorized as a minor arterial. Additionally, collectors gather traffic from local roadways and funnel that traffic to the arterial roadway network. Prince Street and the planned roadways within the Sunport Commerce Center will likely be classified as collectors.

The following standards apply to all roadways within the Sunport Commerce Center:

Standards

1. Automobile entrances to commercial development shall be designed to ensure safety for motorists, pedestrians, and bicyclists

2. Service access and circulation to commercial developments shall be designed to allow use by both emergency and service vehicles.

3. Provide separate loading and delivery facilities from customer and pedestrian areas.

4. Curb radius standards per County Code.

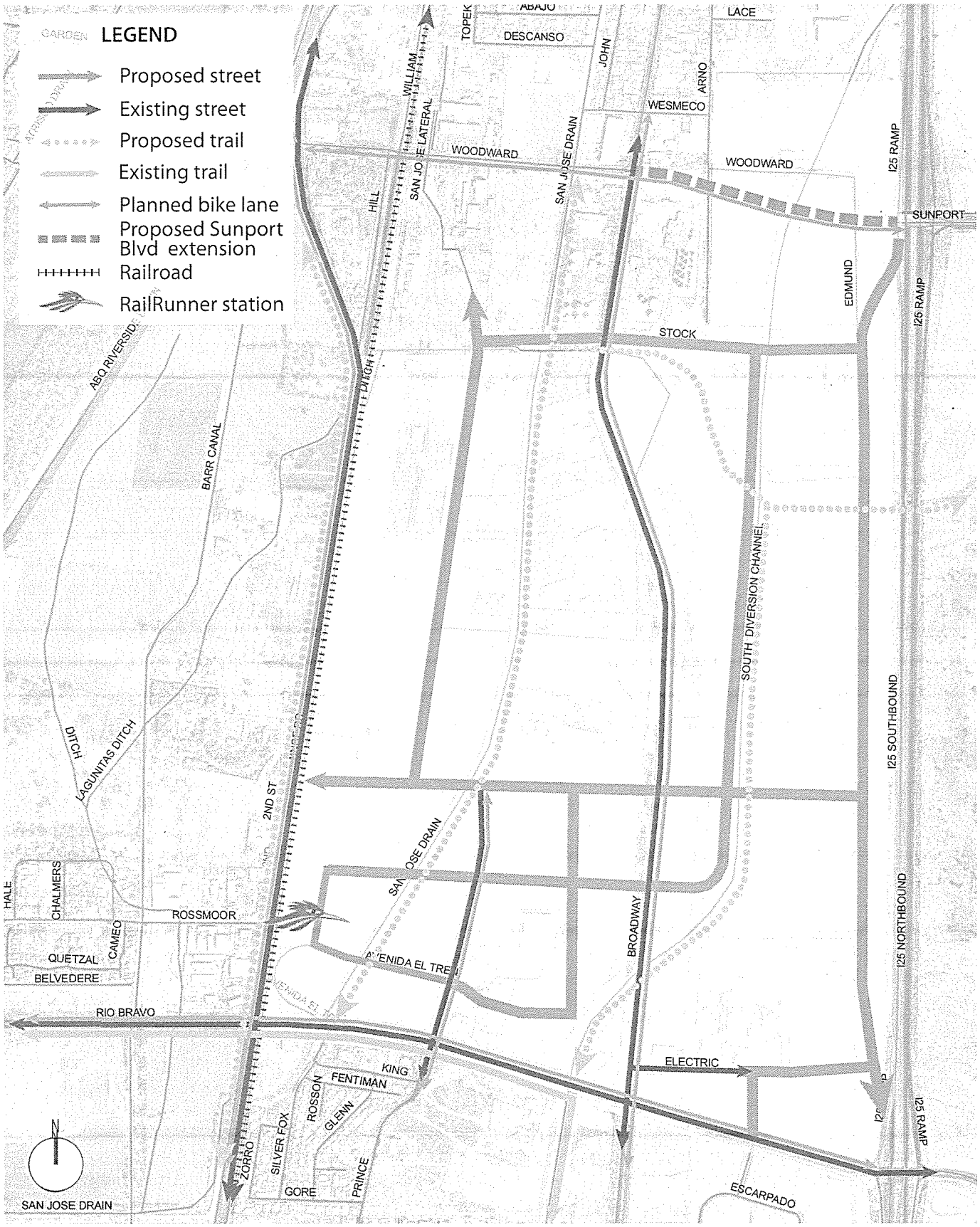


Exhibit B: Access and circulation framework.

Street Trees

Urban tree canopies contribute many positive aspects for the built environment such as reducing the urban heat island effect, providing relief from summer heat for pedestrians, and providing a positive visual aesthetic to urban development. This enhanced image will ultimately contribute to the value of the Sunport Commerce Center and surrounding communities.

Standards

1. Street trees are required along existing and proposed streets.

2. New trees shall have an approximate regular spacing of 30 feet or less on center. Modifications can be made in extraordinary circumstances where utilities or other infrastructure make it difficult to meet this requirement.

Trees should be planted in either a landscape strip a minimum of four feet wide parallel to and adjacent to the street or in minimum size 4' x 4' ground level planter with grates that are flush with the sidewalk.

Examples of street trees and landscape strip. Photo by Travis Lewis.

Sidewalks + Crosswalks

Connectivity and access characterize walkable environments. Crosswalks contribute to an area's walkability by providing attractive and safe routes for pedestrians to cross streets. This basic infrastructure also promotes health for nearby residents and employees by providing safe places to recreate and encouraging commuting by means other than the automobile.

Standards

1. Sidewalks shall be a minimum of 4' in width and include a landscape strip that is a minimum of 4' in width.

2. Crosswalks shall be marked by striping and/or textured/colored pavement for high visibility. Examples of allowable materials include:
    - Colored or Portland Grey concrete
    - Pavers/brick
    - Thermo-plastic striping

3. Crosswalks shall be required where sidewalks are interrupted by driveway curb cuts. Crosswalks are also required on-site in parking lots larger than 50 spaces to define a primary path to building entrances.

4. Raised medians shall be used for pedestrian refuges in crosswalks with cut-throughs for wheelchairs where turn-lanes exist.

Examples of crosswalk elements.

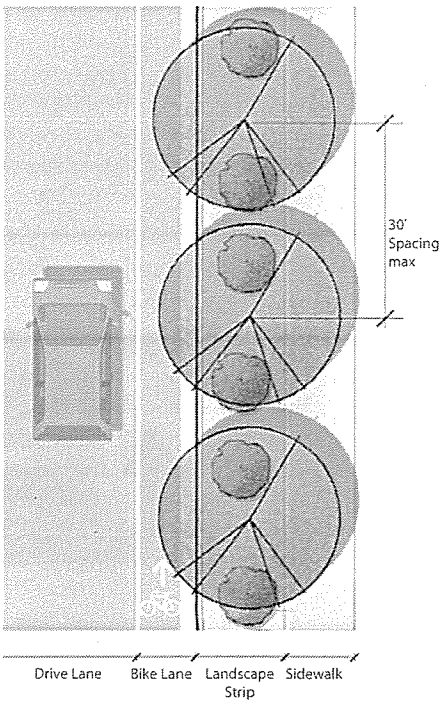


Exhibit C: Street tree spacing.

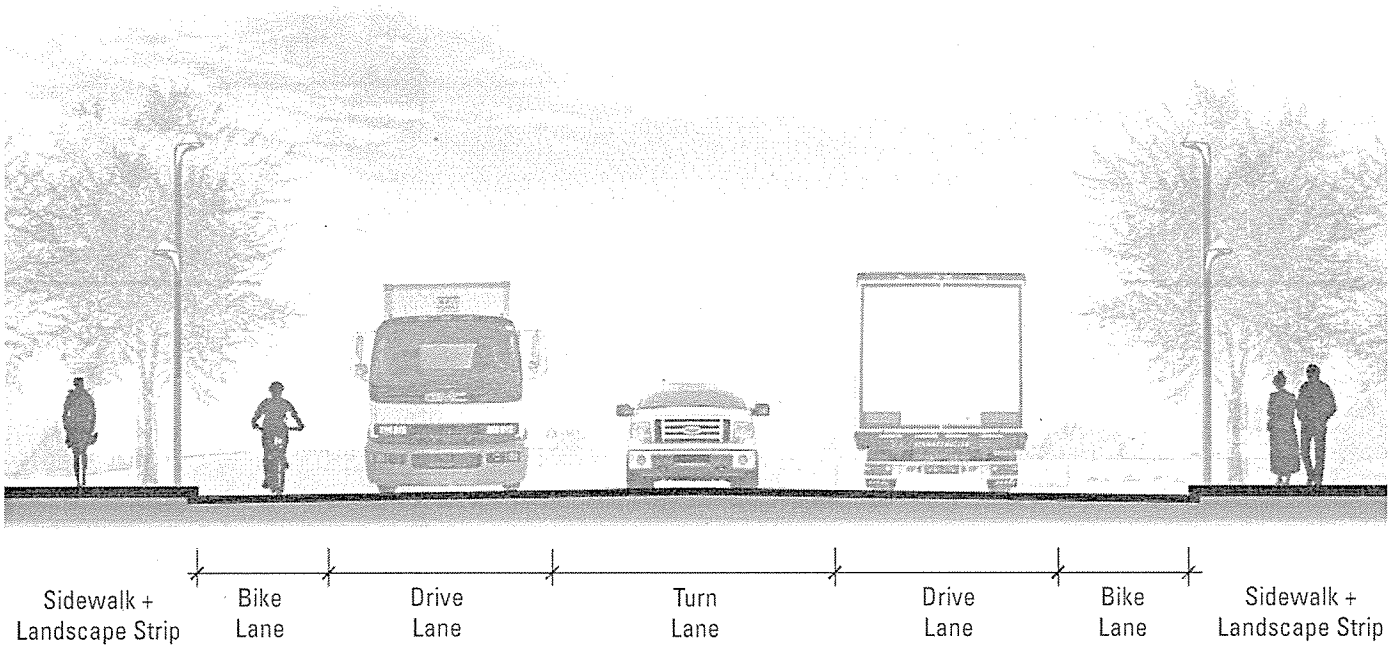


Exhibit D: Typical arterial street section.

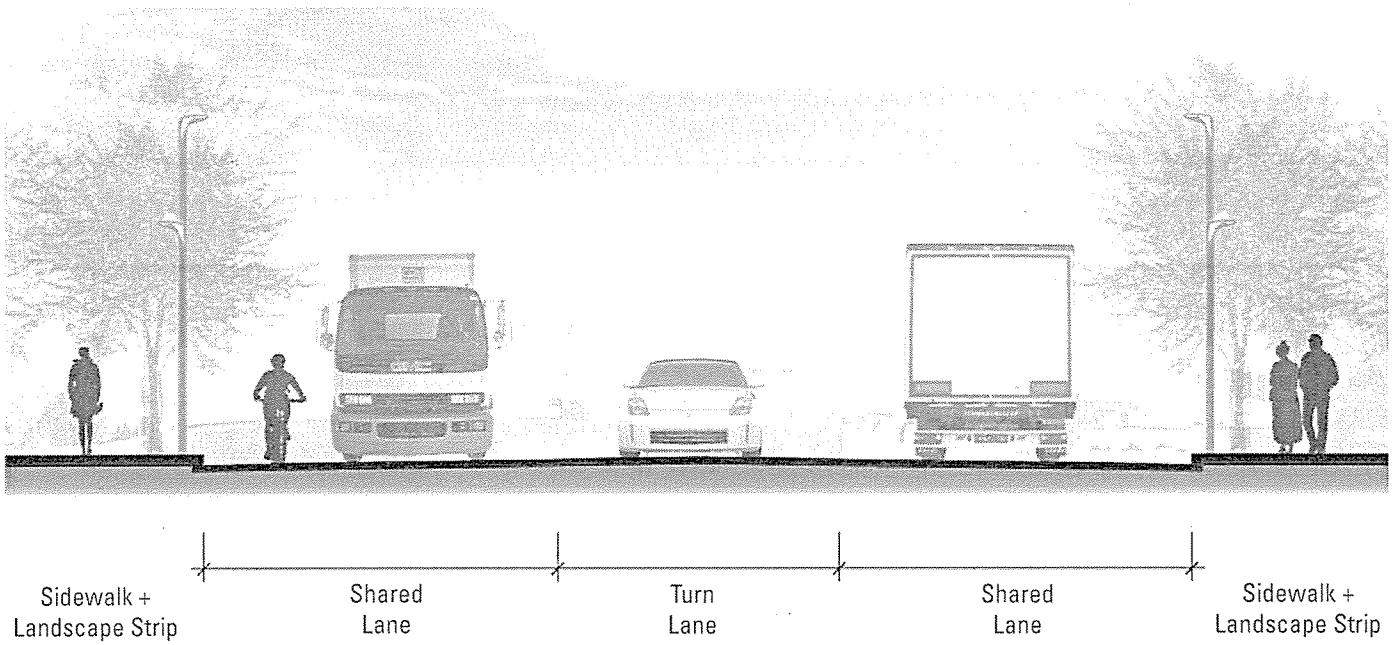


Exhibit E: Typical collector street section.

5. Pedestrian countdown signals that are audible and visual shall be installed and signal buttons shall be located at the appropriate height next to curb ramp landings. Signals shall be timed for children, seniors, and the disabled.

6. Bus stops shall consist of a sign and bench at the very minimum. In areas of higher use, a shelter is appropriate.

7. Pedestrian lighting shall be installed along sidewalks and all crosswalks shall be well lit.

8. Pedestrian and accessible facilities are to be constructed according to AASHTO, "Guide for Planning, Design, and Operation of Pedestrian Facilities."

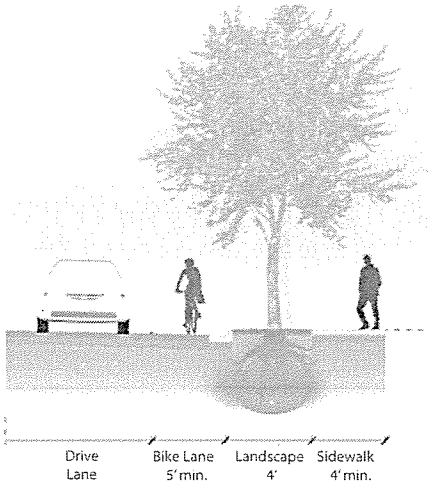
9. All ramps shall be designed to ADA standards and be in line with crosswalks. Two ramps at each corner are recommended.

10. All public art and site furnishings shall be coordinated with existing bus stops to accentuate the wayfinding and pedestrian experience.

Bus Shelter.

Bicycle Facilities

Despite the high volume of traffic on adjacent streets, bicycles can be an important element of daily life and contribute to the character and function of the area. To properly promote and support safe biking, practices such as those outlined below shall be followed.



Street accommodating bike lane.

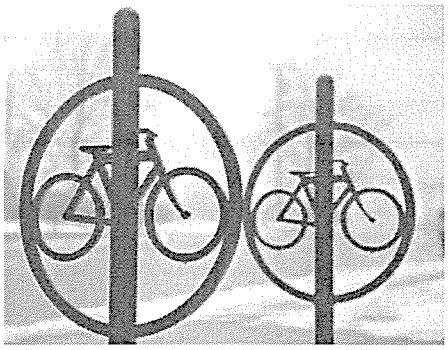
Standards

1. Major and minor arterial streets within the Sunport Commerce Center Design Overlay shall be designed to accommodate bike lanes (see Exhibit D and E on previous page). Bike lanes need to meet minimum County standards (5' wide) and be properly defined with a high contrast stripe. Ideally, the lane is painted a solid color to distinguish the extents of the bike lane.

2. Bike lanes shall be marked with proper signage, both within the lane on the ground and with posted street signs.

3. Bike lanes shall be properly coordinated and marked at right turn lanes.

4. Short-term bike parking shall be visible, secure, well lit, unimpeded by stationary objects, and easily accessible.



Example of bicycle racks.

5. Bicycle facilities shall be constructed according to AASHTO, "Guide for the Development of Bicycle Facilities 4th Edition."

6. One bike space shall be provided for every 20 car spaces. Bike racks will be located within 40' of the primary building entrance.

7. 10% of the required bike spaces shall be in the form of covered, secure bike storage. This can be indoors or outdoors.

Art related to the river.
Source: American City and County

Open Space + Parks

Provision of open space is vital to the development of healthy communities. As the area develops, there exists an opportunity to create useful, accessible, and inviting open spaces. There is also an opportunity for the open space to physically connect to and reflect the presence of the nearby Rio Grande bosque and International Sunport. Exhibit B shows proposed trails along the San Jose Drain and South Diversion Channel.

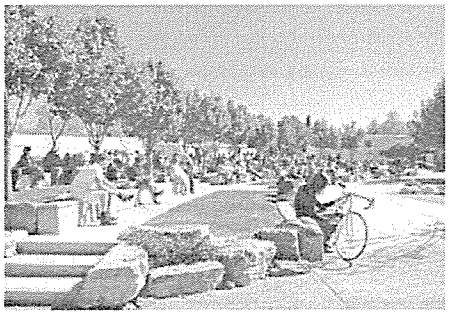
Standards

1. Public parks, plazas, and recreational spaces shall be open and accessible to the public from public streets, walkways, and trails.

2. Integration of art into the design and development of open space and parks is encouraged.

3. Consider integrating elements of the bosque as well as the Sunport in the design of open space and parks.

4. Properties adjacent to drainage arroyos shall have a minimum 20' buffer adjacent to arroyos and allow for passage along drainage arroyos.



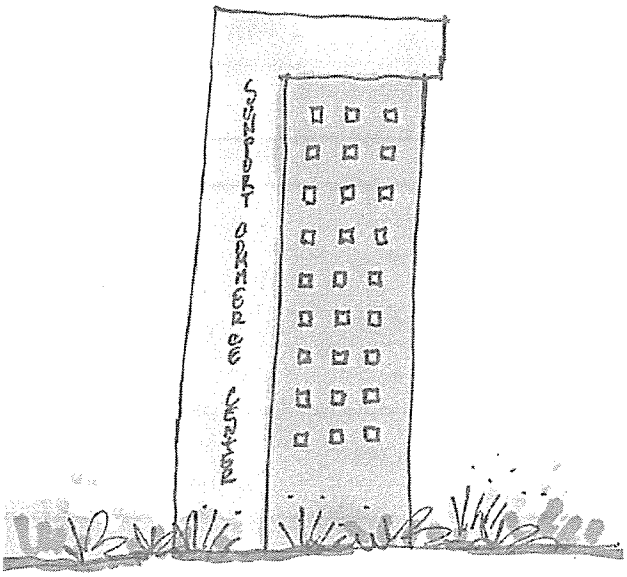
Example of active public space.

Gateways + Signage

The Sunport Commerce Center endeavors to become a primary gateway to the South Valley while simultaneously developing its own brand. Gateway signage helps to celebrate the unique qualities of places. They provide a sense of entry and exit as well as emphasize the importance of the place they are celebrating. Signage shall reflect key characteristics of the area through materiality and design in addition to the following guidelines:

1. Place gateway signage at key locations that will highlight the significance of the Sunport Commerce Center. See following page for potential locations.

2. Exact location, design, and placement of gateway signage shall be determined by the County.



Potential gateway concepts for Sunport Commerce Center.

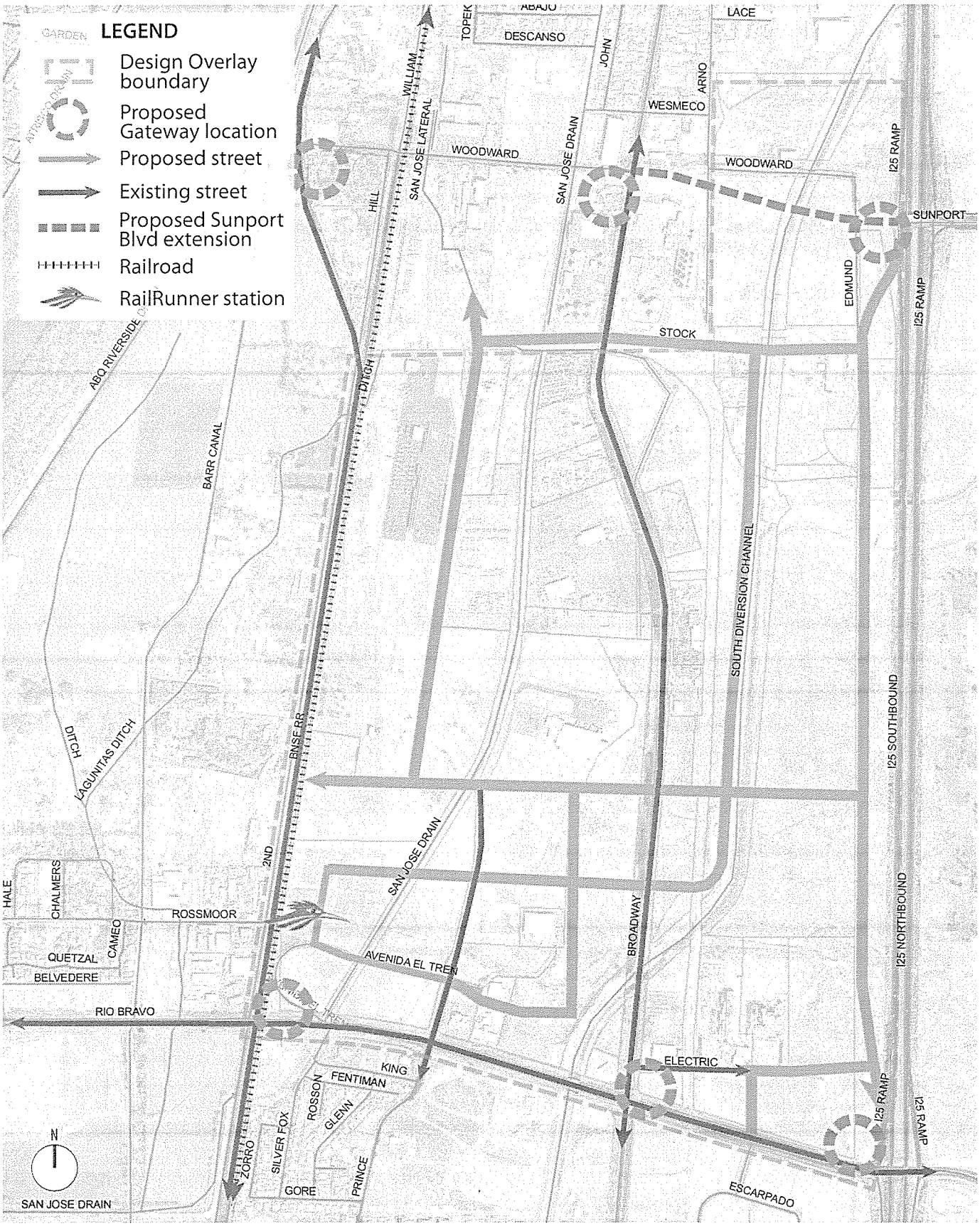


Exhibit F: Potential gateway signage locations.

AREA STANDARDS

Building Orientation

Buildings within the Sunport Commerce Center shall be oriented toward the street. The site circulation shall address and enhance the pedestrian realm. Building facades shall be designed to enliven the frontages of buildings and contribute positively to the overall character of the street and the district.

1. Primary entrances shall be prominent and placed along the primary street or near a street-adjacent corner. The primary street is the right-of-way that is taken to access the site.

2. Mirrored glazing and blank facades are not permitted on the ground-level of street-facing facades and are discouraged in general.

3. Loading docks, overhead doors, and service entries are strongly discouraged along street-facing facades and should only be used when other options are not available.

Height Standards

1. The maximum building height shall be 60 feet, measured to the tallest part of the building from grade. Special architectural features such as clock towers, bell towers, and cupolas may extend up to 8 feet above the maximum building height, provided they are no more than 30 feet in width and make up no more than one third of the building's entry façade.

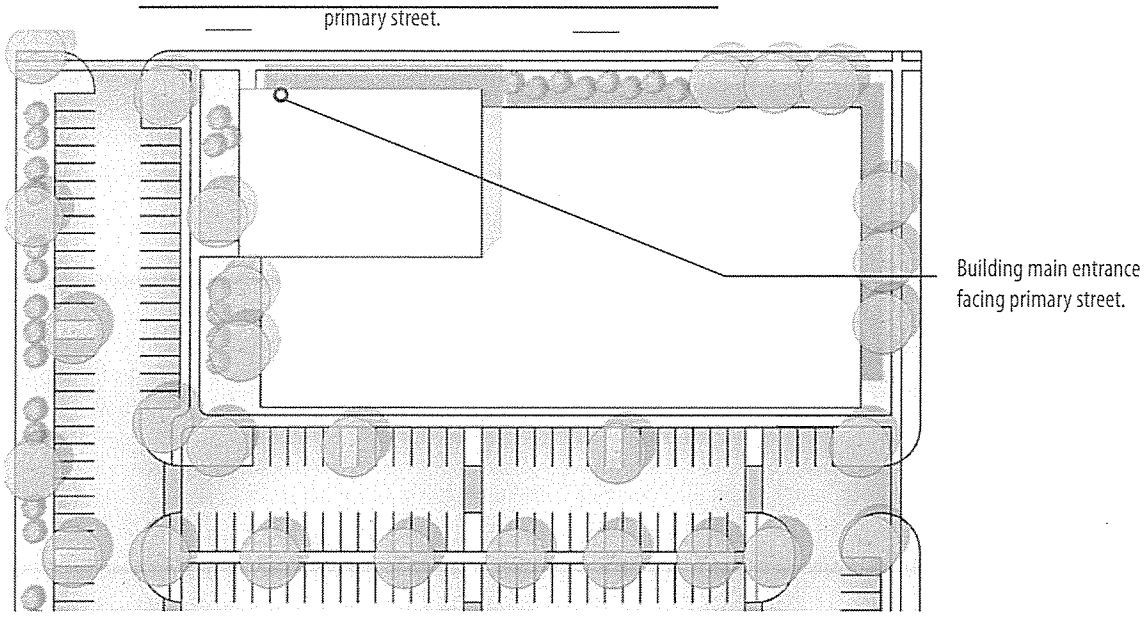


Exhibit G: Building location close to primary street.

Setback Standards

Reduced setbacks result in a more active and interesting pedestrian realm. Buildings should be sited near the public right-of-way to contribute to the public realm. Topography in this area makes it difficult to enforce area-wide, however. Thus, flexibility is provided for such instances.

1. Buildings shall be located as close to a primary street as possible. Setbacks standards are as follows.
    - Front: 100' maximum
    - Side: 10' minimum
    - Rear: 10' minimum

Examples of clearly expressed entrances, street facing building walls, and color variations.

ARCHITECTURAL CHARACTER

Standards

1. Primary building entrances shall be clearly expressed. Building entrances on corner lots shall address both streets.

2. All street-facing building walls shall be articulated with consistent style and materials. Exterior building walls shall contain windows, punched openings, change in height or plane, awnings or vertical posts every 80 feet or less.

3. Rooftop mechanical equipment shall be screened from view when standing on the adjoining sidewalk.

4. All industrial activities/materials and processing/assembling shall be conducted within an enclosed structure or covered area.

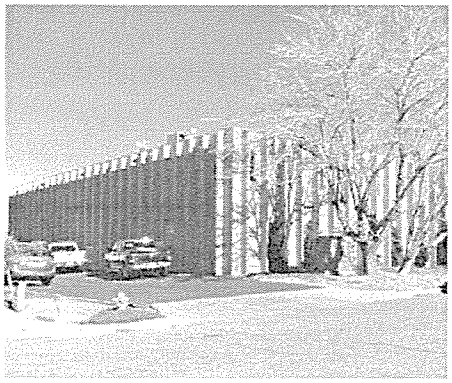
5. Materials stored in yards cannot be higher than 10 feet and must be screened by a 10-foot high wall or fence (see Walls + Fences, p.21).

6. Service areas such as loading docks, trash compactors, and storage yards shall be screened and/or located away from pedestrian areas to ensure they are out of sight of the public right-of-way and public open spaces.

7. Walls and/or fences are required for screening non-residential uses that abut residential properties (see Walls + Fences, p.21).

8. Limited use of accent colors on doors, covered entries and to highlight specific building masses is encouraged. Color palettes shall be approved by the County.

9. Refuse collection areas shall be screened with a maximum 8-foot high solid wall or fence, and must be effectively designed to contain all refuse generated on-site and deposited between collections. Deposited refuse should not be



Example of prohibited Twin-T construction.

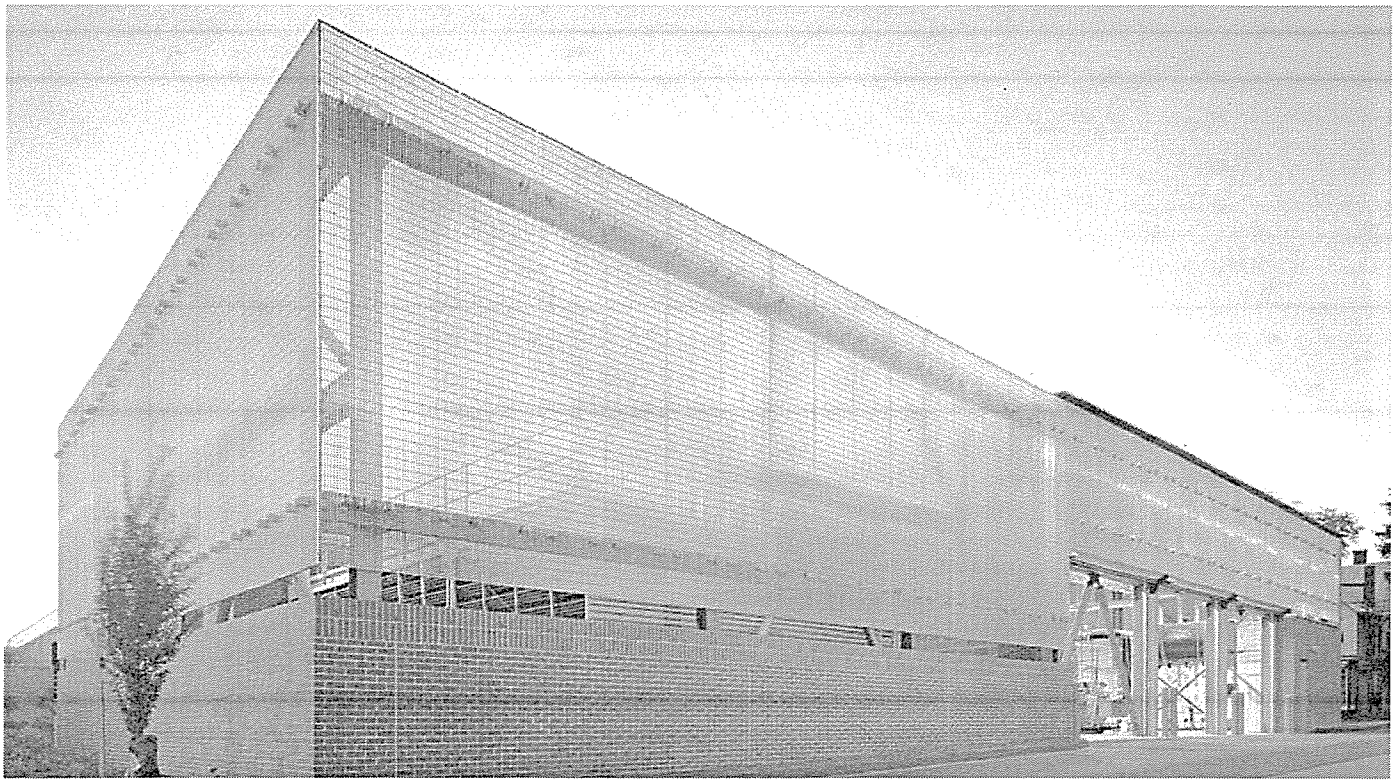
visible from outside the refuse enclosure. No refuse collection areas shall be located between street and building fronts.

Material Quality & Detail Standards

1. All buildings shall use materials that are durable, easily maintained, and of a quality that will retain their appearance over time.

2. Highly reflective mirror glass is prohibited at the ground level of street-facing facades.

3. The following materials shall be prohibited:
   - Twin-T construction.
   - Natural wood or wood paneling shall not be used as a primary exterior wall cladding system.
   - Natural concrete masonry unit (CMU) is not permitted as a primary exterior finish.
   - Pre-manufactured metal buildings shall be prohibited where visible from the public right-of-way.



Example of architectural character and screening.
Source: Spillman Farmer Architects

U.S. Foods facility, located within the Sunport Commerce Center.

Example of building orientation along a primary street.

Pedestrian paths through parking lot, with integrated native vegetation and pervious surfaces. Photo by Travis Lewis

Example of rainwater harvesting along the parking perimeter.

SITE DEVELOPMENT

Off-Street Parking

The design of off-street parking within the business park is a key consideration in creating an aesthetically pleasing area. Adequate and convenient off-street parking must be provided in a manner that does not make parking areas the predominant feature of an individual site. Required off-street parking ratios and requirements, including handicapped parking, shall be per the Bernalillo County Zoning Code and as listed below:

Standards

1. Parking minimum requirements shall be 1 space per 300 sf for office uses, 1 space per 250 sf for retail uses, and 1 space per 1,000 sf for manufacturing, warehouse, and light industrial uses, or per applicable zoning.

2. Bicycle parking shall be provided at one space per 20 parking stalls.

3. Development within 1,000 feet of a bus stop shall be eligible for a 20% reduction in overall off-street parking requirements.

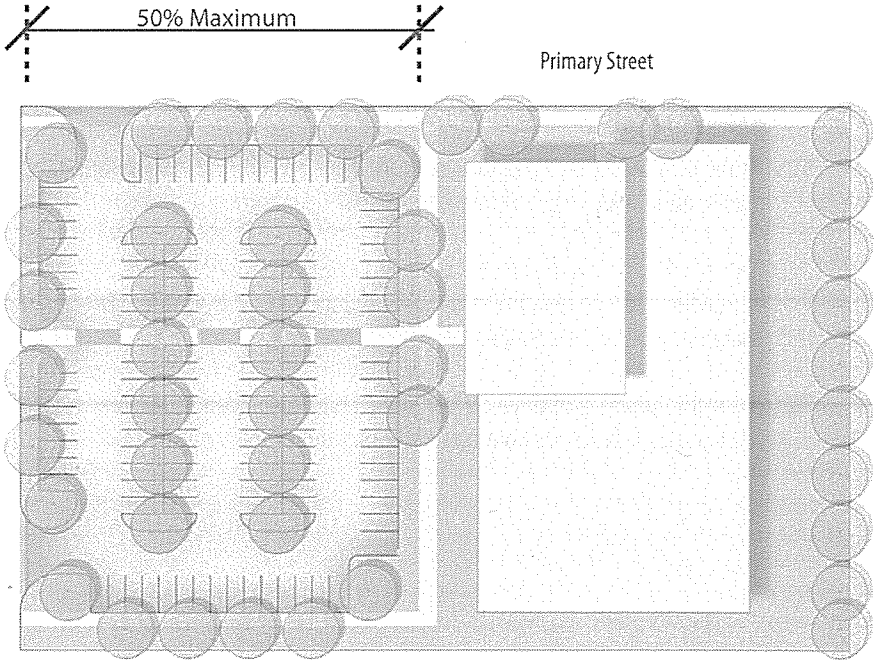


Exhibit H: Diagram illustrating maximum parking frontage for retail/ office uses, pedestrian pathways through the parking lot, and water harvesting areas located along the parking perimeter and parking medians

4. Shared parking is encouraged and may be applied when adjacent land uses have different/complementary parking demand patterns – allowing these spaces to be effectively and efficiently used throughout the day. Applicants for development should examine the feasibility of using shared parking.

5. Parking lots shall be subdivided by pedestrian paths and/or landscape areas so that no parking cell shall have greater than 100 spaces. Pedestrian paths with a minimum clear width of 6 feet shall be provided within parking lots to create direct connections between parking areas and buildings. Shade trees will be planted a minimum of 30 feet on center along parking lot pedestrian paths (see exhibits I and J to the right).

6. Surface runoff in off-street parking lots shall be directed to landscaped water harvesting areas. Drainage shall be directed to planting areas to maximize percolation and reduce the need for irrigation. Pervious paving/ surfaces are highly encouraged.

7. All parking should be located at the rear and/or sides of a building.

8. For retail/office uses, parking areas shall not constitute more than 50% of the street frontage.

9. Loading areas shall be separated from automobile parking and screened from view from the primary street right-of-way and adjacent properties.

10. Pedestrian walkways/ADA access shall be provided between bus stops, public sidewalks, and building entrances.

11. Pedestrian walkways shall be provided between parking aisles to building entrances. Walkways are to be clearly demarcated from the ADA parking spaces to building entrances.

12. Drive-thru aisles and drive-up windows shall be placed at the rear or sides of buildings where possible and not along the primary street.

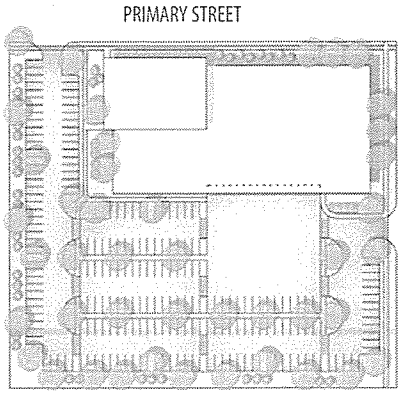


Exhibit I: Diagram illustrating loading area to the rear of a facility

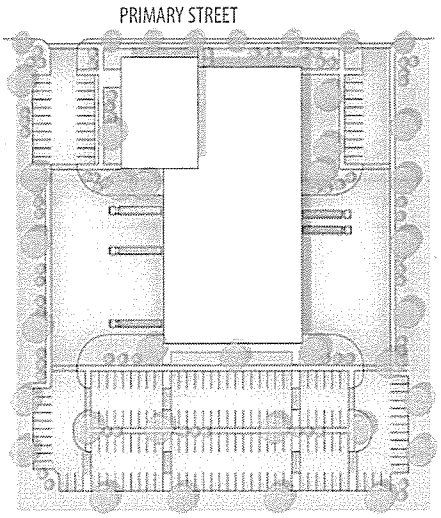


Exhibit J: Diagram illustrating cross-dock loading.

Example of landscaping.

Example of native vegetation.

Landscape

Landscape design standards are intended to create enduring landscapes that add value, create an overall district identity, as well as complement and protect the local natural environment. Landscape designs shall comply with applicable standards of the Bernalillo County Zoning Code. The landscape design shall be water conserving in the broadest sense by shading buildings and parking areas and reducing energy use, utilizing drip irrigation to eliminate overspray and reduce evaporation, using drought tolerant and native species that flourish in local conditions, and restricting the use of spray irrigation unless it is for turf or native seed areas. The following are additional requirements.

Standards

1. Native/Xeric Plants: a minimum of 50% of the plant materials visible from the street shall be regionally native, low water-use plants. Extensive use of low water use plants is recommended to reduce water, fertilizer, and pesticide use.

2. Turf: High water use turf shall be limited to a maximum of 10% of the total landscape area. There is no limit to turf use when using non-potable water. When used in the landscape design, all varieties of turf areas should be designed to be efficiently irrigated.

3. Irrigation: A fully automated irrigation system is required to support landscaping within sight of the street. The use of spray irrigation shall be limited to turf or seeded areas. The majority of emitter devices shall be drip. Use of evapotranspiration-based controllers is encouraged.

4. Erosion Control: All landscape areas shall be stabilized with mulches or plant material to keep soils from washing or blowing away.

5. Vegetative Cover: Landscape area visible from the street shall achieve a minimum of 75% vegetative coverage within five years. Planting is required in front of walls that are setback from the property line where visible from the street.

6. Water Harvesting: Wherever possible, the landscape design shall incorporate active and passive water harvesting techniques to reduce potable water use for irrigation. Water harvesting areas must meet vegetative coverage requirements and is required in off-street parking areas with more than 20 parking stalls.

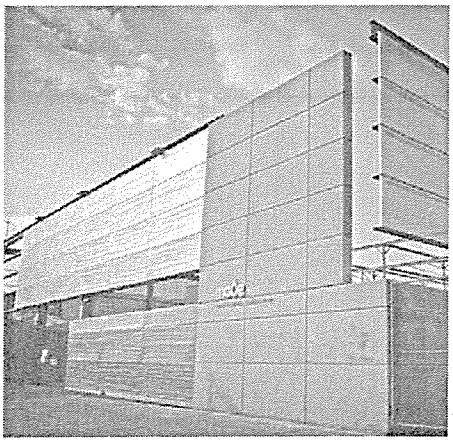
7. New development shall be required to surpass the number of required trees per current code by 10%.

8. Landscaping, low walls under three feet in height, and patios shall be used to define the transition from the public right-of-way onto private property.

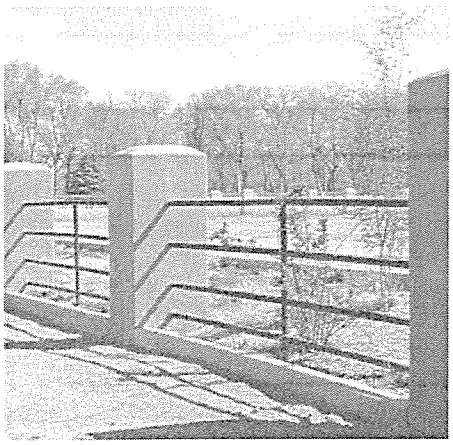
9. Street-fronting side yards (yards on corner lots) should be similar in design and quality to typical front setback landscaping.

10. Flood irrigation is prohibited unless it is for agricultural uses.

Example of native/xeric plants and water harvesting. Photo by Travis Lewis.



Example of screen wall.



Example of tubular steel fencing.

Walls + Fences

Delineation of property is done for many reasons and often by various styles of walls and fences. Walls and fences should be designed in an aesthetically pleasing manner, using natural and regional materials that contribute to the overall identity of the Sunport Commerce Center.

Standards

1. Use of fluted or plain gray CMU as the exposed wall surface is prohibited.

2. Chain-link, razor wire, and concertina wire are prohibited.

3. All walls visible from the primary street right-of-way shall have a finished appearance (stuccoed, painted, or cladded).

4. Walls and fences used for screening purposes are not to exceed 10 feet in height. Ten feet is the tallest that a solid wall can be, with up to two 2 feet of additional height consisting of a see-through material such as trellises, arbors, and semi open structures. Focus on walls abutting primary street. (note: walls over 6 feet in height may require to be engineered)

5. Walls and fences buffering residential uses from non-residential uses should take on the character of the residential use.

6. For fencing, allowable materials include the following:
    - Metal – tubular steel, wrought iron, metal panel, and wire mesh.

Utilities

Standards

1. Where required, above grade utility structures shall be grouped and located on the site in a manner that minimizes their visual impact from the street. Utility cabinets and structures shall be located on the sides or rear walls of structures. Free-standing meters are not permitted.

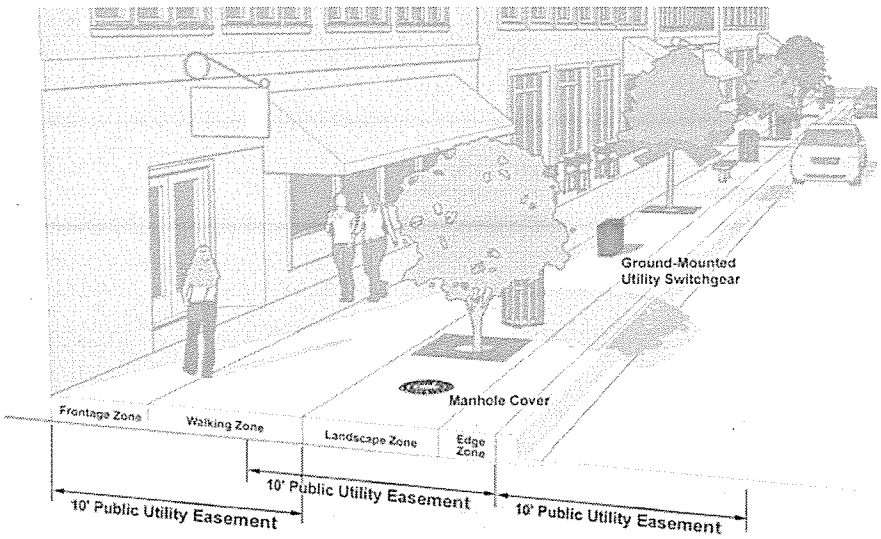
2. Solar technology (such as panels and solar hot water technology) is permitted and encouraged for use on rooftops and on grade.

3. Mechanical and other equipment on the ground and/or on rooftops shall be screened to obscure or minimize visibility from view when standing on the adjoining sidewalk. Any screening of ground-mounted transformers must be designed to allow for access to the equipment. All screening and vegetation surrounding ground-mounted transformers and utility pads shall allow 10 feet of clearance in front of the equipment door and 5 feet of clearance on the remaining three sides for safe operation, maintenance, and repair purposes.

4. Visible electrical equipment and conduits shall be installed in an orderly fashion and shall complement or blend in with the facility.

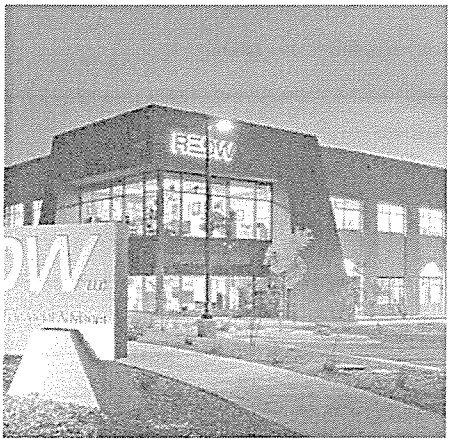
5 Any new utilities must be installed underground.

6. Consult with utility providers prior to finalizing site plans.



Potential Public Utility Easement Location
(not to scale)

Source: PNM



Example of outdoor lighting. Photo by Patrick Coulie

Example of signage.

Lighting

Lighting design standards are intended to minimize light trespass and protect views of the night sky. All site and landscape lighting shall be fully shielded to minimize light trespass. Temporary lighting for social or seasonal events is permitted.

Standards

1. Heights shall be a maximum of 25 feet.
2. All lighting fixtures shall be night sky/dark sky compliant.
3. Lighting shall be located so that it does not shine beyond the property boundary.
4. Lamps shall be incandescent, metal halide or light-emitting diodes (LED).
5. Lighting levels shall not exceed the standards set forth by the Illuminating Engineering Society of North America (IESNA).

Signage

Signage should complement the building by being compatible with the building architecture and be appropriately scaled. Signage in the Sunport Commerce Center shall be as per the Bernalillo County Zoning Code, C-1 Zone.

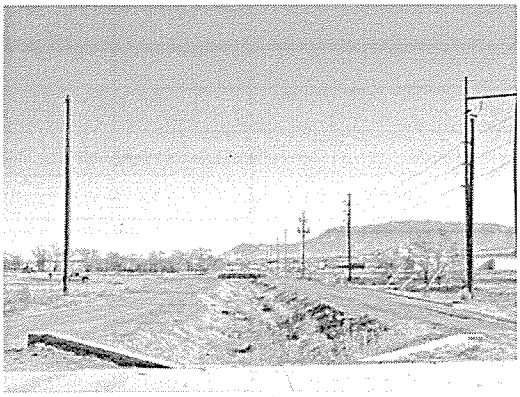
Submittal Requirements Checklist			
	On-Site Standards. These standards are compiled from the document. Applicants shall review the checklist for compliance. County reviewers shall verify compliance with the standards.	Applicant	County
	Written project summary:		
1	Provide a short narrative description of the proposed project, its primary features and its compatibilitywith the local context.		
	Colors		
2	Provide samples of colors to be used in the project. Provide samples of base, trim, and accent colors. Acceptable forms of samples include: Paint swatches/stucco color chart/actual sample painted surfaces 1 sq. ft. or less.		
	Lighting		
3	Identification of all light fixture locations including whether they are ground-mounted or structure mounted. Locations shall be shown on the site plan as well as the landscape plan.		
4	Provide a copy of the manufacturer's catalog sheet.		
5	For sites over one acre, a photometric plan shall be required. Provide the calculated illuminance levels on a maximum of 10' grid		
	DESIGN STANDARDS		
	Open Space + Parks		
1	Public space is open and accessible from public streets, walkways, and trails		
2	Drainage arroyo adjacent properties shall contain a minimum 20' buffer to allow for passage along arroyo		
	Building Orientation		
3	Primary entrance is prominent and placed along primary street or near a street-adjacent corner		
4	There is no mirrored glazing or blank facades on ground level		
	Height Standards		
5	Maximum building height is 60' or less		
	Setback Standards		
6	Setbacks are within allowable limits		
	Architectural Character		
7	Primary building entrance is clearly expressed		
8	Street-facing building walls are articulated		
9	Exterior building walls contain windows, punched openings, change in height or plane, awnings or vertical posts every 80 feet or less		
10	Rooftop mechanical equipment is screened from view		
11	Industrial activities/materials and processing/assembling is conducted within an enclosed structure or covered area		
12	Service areas are screened or located away from pedestrian areas		
13	Walls and/or fences are used to screen non-residential uses from residential properties		
14	Refuse collection areas are screened with a maximum 8' high solid wall or fence		
	Material Quality & Detail		
15	Building(s) use dureable, maintainable materials		

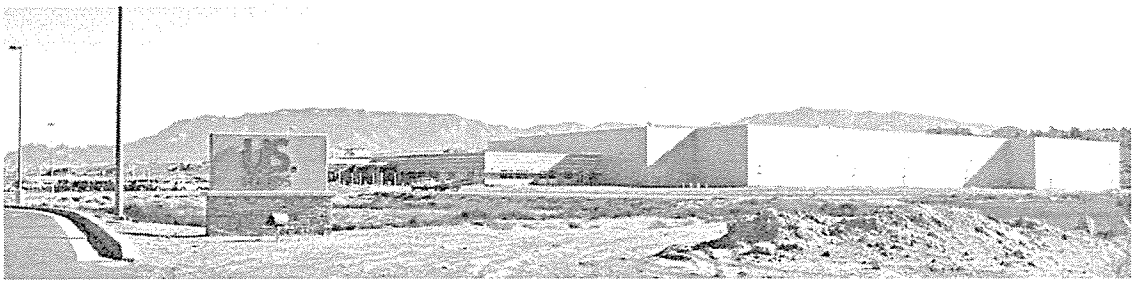
Submittal Requirements Checklist			
16	Highly-reflective mirror glass is NOT used on the ground level of a street-facing façade		
	Off-Street Parking		
17	Parking is provided at 1 space per 300 sf of office uses, 1 space per 250 sf for retail uses, and 1 space per 1,000 sf for manufacturing, warehouse, and light industrial uses, or per applicable zoning.		
18	Bicycle parking is provided at 1 space per 20 vehicle parking stalls		
19	Parking lots are subdivided by pedestrian paths and/or landscape areas so that parking cell does not contain greater than 100 spaces		
20	Pedestrian paths through parking lots are a minimum 6' in width		
21	Shade trees in parking lots are planted at no greater than 30' on center along pedestrian paths		
22	Surface runoff from parking lot is directed to landscaped water harvesting areas		
23	Parking is located at the side or rear of a building		
24	If retail/office use, parking area does not constitute more than 50% of street frontage		
25	Loading areas are separated from parking		
26	Loading areas are screened from primary street right-of-way and adjacent properties		
27	Pedestrian walkways/ADA access is provided between bus stops, public sidewalks, and building entrances		
28	Pedestrian walkways are provided between parking aisles and building entrance(s)		
29	Drive-thru aisles and drive-up windows are placed at the rear or sides of buildings Landscaping Landscaping		
	Landscaping		
30	A minimum of 50% of plants visible from the street are native, low water use plants		
31	High water use turf consistutes less than 10% of total landscaped area		
32	A fully automated irrigation system is installed to support street-visible landscaping		
33	Landscape areas are stabillized wth mulches or plant material to keep soils from washing or blowing away		
34	Planting is located in front of walls that are setback from the property line where visible from the street		
35	Water harvesting is incorporated where possible and in off-street parking areas greater than 20 parking stalls		
36	Landscpaing, low walls below three feet in height, and/or patios are used to define transition from public right of way to private property		
37	Street-facing side yards are similar in design and quality to front setback landscaping		
	Walls + Fences		
38	Walls visible from primary street right-of-way has a finished appearance		
39	Wall and fences used for screening do not exceed 10 feet in height		
40	Walls and fences buffering residential uses take on the character of the residential use		
41	Fencing utilizes an allowable material		
	Utilities		

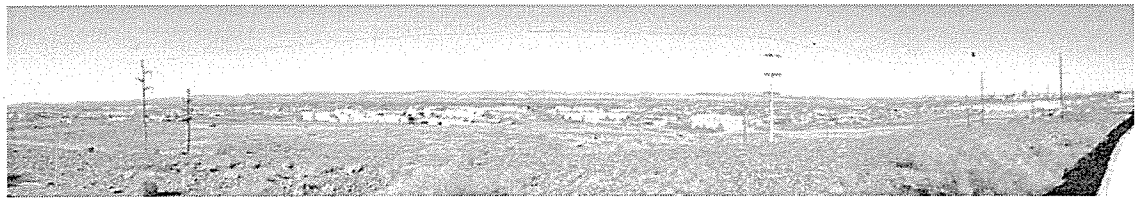
Submittal Requirements Checklist			
42	Above grade utility structures are grouped and located in a manner that minimizes their visual impact from the street		
43	Mechanical and other equipment on the ground and/or rooftop is screeend to obscure from view when standing on the adjoining sidewalk		
44	Visible electrical equipment and conduit is installed in an orderly fashion		
45	New utilies are installed underground		
	Lighting		
46	Fixture heights are a maximum of 25 feet		
47	Fixtures are night sky/dark sky compliant		
48	Lighting is located so that it does not shine beyond the property boundary		
49	Lamps are incandescent, metal halide, or light-emitting diodes (LED)		
50	Lighting levels do not exceed IESNA standards		

Submittal Requirements Checklist			
	Off-Site Standards. These standards are compiled from the document. Applicants shall review the checklist for compliance. County reviewers shall verify compliance with the standards.	**Applicant**	**County**
	Street Trees		
1	Street trees spaced maximum 30'		
	Sidewalks + Crosswalks		
2	Sidewalks minimum 4' width		
3	Landscape strips minimum 4' width		
4	Pedestrian crosswalks striped/textured/for high visibility		
5	Pedestrian refuges in medians (may be County responsibility)		
6	Pedestrian signals are audible as well as visual and timed for children, seniors, and the disabled		
7	Pedestrian countdown signal buttons are installed at the appropriate heights next to curb ramp landings.		
8	Bus stops contains a minimum of a sign and a bench		
9	Pedestrian lighting is installed along sidewalks		
10	Crosswalks are well lit		
11	Ramps are designed to ADA standards		
	Bicycle Facilities		
12	Bike lanes are marked with proper signage		
13	Bike lanes are properly coordinated and marked at right-turn lanes		
14	Short-term bike parking is visible, secure, well lit, and easily accessible		
15	Bike spaces are provided one space per every 20 auto spaces		
16	10% of required bike spaces are covered, secure spaces		
	Open Space + Parks		
17	Public space is open and accessible from public streets, walkways, and trails		
18	Drainage arroyo adjacent properties shall contain a minimum 20' buffer to allow for passage along arroyo		

APPENDIX A:
SUNPORT COMMERCE CENTER
Existing Conditions Assessment







Dekker/Perich/Sabatini
architecture interiors planning engineering

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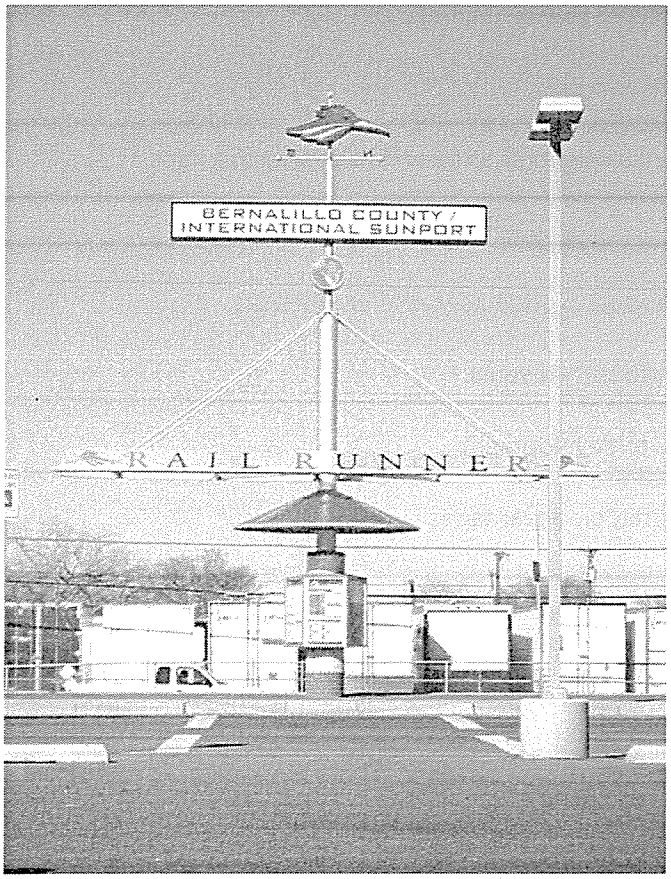


01 SUMMARY

The Sunport Commerce Center area, comprised of approximately 900 acres, has the potential to become a high quality employment district. With its proximity to rail, Interstate, and the Albuquerque International Sunport, this district is well suited for businesses that require good access to transportation. New developments such as the opening of the U.S. Foods Distribution Center and the Rio Grande Credit Union indicate renewed interest in the area for a variety of types of businesses. With the extension of Sunport Boulevard to Second Street, the area could attract additional interest for airport-related cargo and other businesses. The Rio Bravo Railrunner Station provides good public transit access for employees. The Rio Bravo Station Area Plan also has the potential to create a multi-use development adjacent to the station, with residential and retail components.

This Existing Conditions Assessment provides an overview of the area in its current state. This effort was completed in an effort to assess common issues that detrimentally impact the area as well as those opportunities and strengths that can be leveraged to enhace the image and character of the area.

The assessment includes review of:

- relevant policy such as comprehensive plans and sector plans
- existing zoning
- anticipated transportation projects that affect the area
- stakeholders and property owenrs
- known constraints to development
- competitive and strategic advantages

02 RELEVANT POLICY

Albuquerque/Bernalillo County Comprehensive Plan (A/BC Comprehensive Plan)
As a Rank I Plan, the A/BC Comprehensive Plan provides broad policy direction for development in Bernalillo County and the City of Albuquerque. Although the current document dates from 1988, there have been several periodic revisions to the plan in the past twenty years.

A primary policy directive is the Centers and Corridors Plan that emphasizes growth along established transportation corridors and within designated activity centers. The intent of this policy is to create higher concentrations of growth at strategic locations throughout the city and connect them with transportation corridors that enable multimodal mobility. Land uses along the corridors are intended to have higher density than the surrounding areas and a mix of land uses, enabling citizens to reduce their need to drive.

The A/BC Comprehensive Plan identifies the Mountain View plan area as Developing Urban. However, the intersection of Rio Bravo and I-25 is identified as a proposed Major Activity Center, with a proposed Community Activity Center located at 2nd and Rio Bravo.

Major Activity Centers are activity nodes that provide "the most highly concentrated locations of commercial, service and employment uses in conjunction with area-wide needs." (A/BC Comprehensive Plan) They typically cover large acreages of land and are accessible by all modes of travel.

Community Activity Centers, on the other hand, provide "the primary focus for the entire community sub-area with higher concentration and greater variety of commercial and entertainment uses in conjunction with community-wide services, civic land uses, employment, and the most intense land uses within the community sub-area. These areas typically range from 15-60 acres and are mostly accessible by automobile." (A/BC Comprehensive Plan)

Southwest Area Plan (SWAP)
This plan covers 115 square miles of the South Valley and the Southwest Mesa. The purpose of the SWAP is to "create a living document that will continue to encourage community involvement, including participation of the public and private sectors, and non-profit organizations, in order to implement the various policies and action strategies."The plan is broken into three sections, the built environment, community involvement and services, and economic development. The approach emphasizes physical planning and its intersection with other planning elements such as land

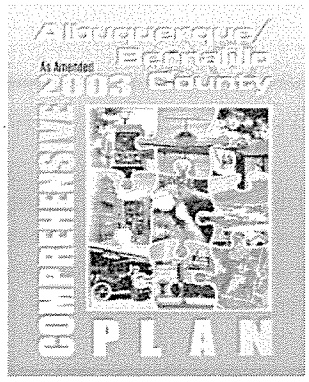
use, transportation, economic development, and natural resources. It establishes zoning and residential density levels, recommends social provisions for services and open space, and promotes economic development that are compatible with the unique and historic community.

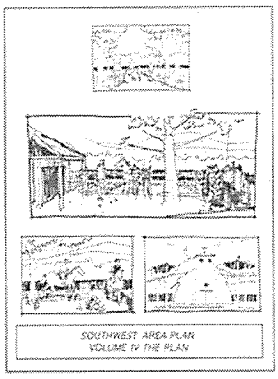
The plan calls for a light industrial corridor in the study area. It is consistent with current zoning in that it calls for M-1 and M-2 uses (described below) within the corridor.

Mountain View Sector Development Plan- Rank III (not adopted)
A recommendation under the Southwest Area Plan was to develop this sector plan, which covers approximately 8,400 acres within portions of the City of Albuquerque and unincorporated Bernalillo County. This plan addresses issues raised in the SWAP by establishing zoning regulations and policies.

The plan breaks up the planning area into 6 sub areas. This Design Overlay falls within the North Mountain View and West Frontage sub areas. Broadway Boulevard delineates the two areas within our study boundary, while 2nd Street and Rio Bravo Boulevard make up the western and southern boundaries, respectively.

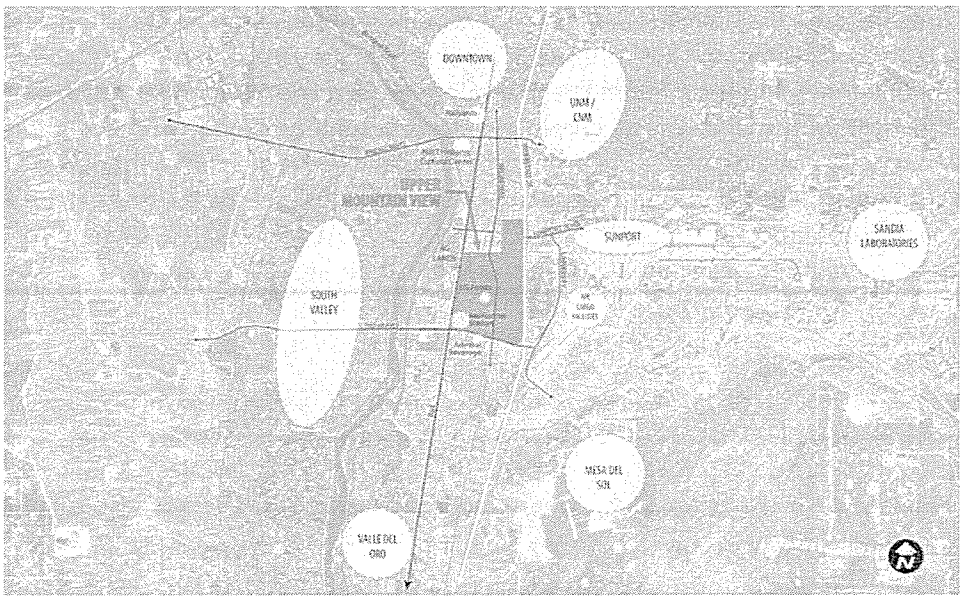
The plan's proposed vision involves the West Frontage sub area containing heavy industry and airport support service employment opportunities. North Mountain View would contain similar uses but have light to clean industries. Broadway Boulevard would become a commercial truck corridor and 2nd Street would become a safe and attractive corridor that is conducive to pedestrian and bicycle use. The plan calls for the station area to become an activity center with mixed uses that are accessible by all modes of mobility, and residential densities ranging from 12 and 20 dwelling units per acre.





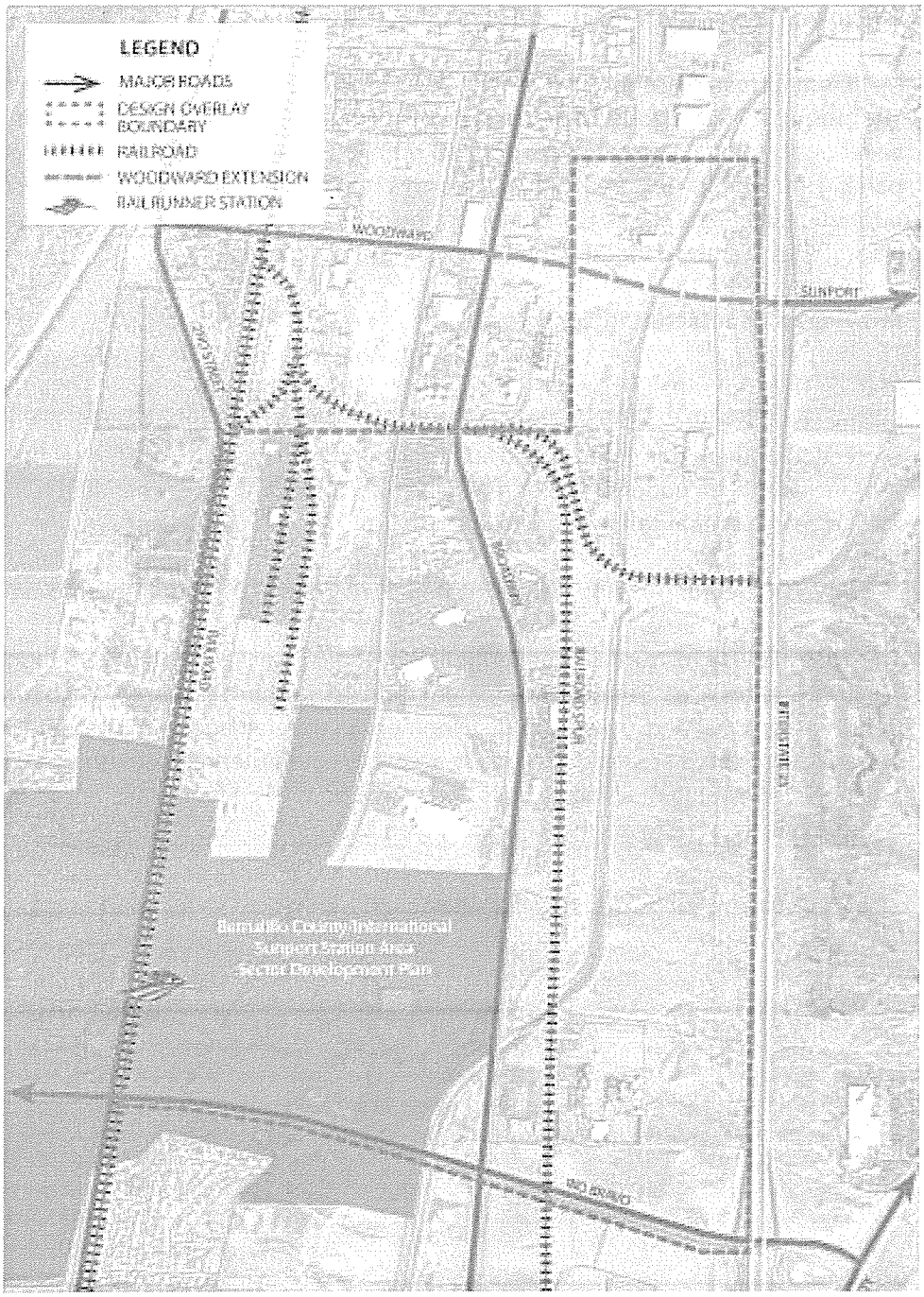
Bernalillo County/International Sunport Station Area Sector Development Plan
The purpose of the plan is to guide quality development within the activity center surrounding the Bernalillo County/International Sunport Rail Runner Station near 2nd Street and Rio Bravo Boulevard. Located in an area that is semi-rural and industrial in nature, the plan's goal is to provide a mixture of uses that are more suitable for areas surrounding the station. The plan promotes a mix of residential, retail, office and light industrial uses and employment opportunities, along with recreational options. Transit-Oriented Development (TOD) defines the development objectives of this plan, with ample open space opportunities as well as a useful street network that encourages pedestrian and bicycle usage. Allowable densities reach up to 60 dwelling units per acre and FAR maximums are 2.0 in designated areas.

03 AREA CONTEXT



The Sunport Commerce Center area of Bernalillo County is seeing renewed interest by the development community. The land represents the largest contiguous tract of undeveloped land centrally located in the Albuquerque metropolitan area. Close proximity to downtown, research insititutions such as UNM, CNM, and Sandia Laboraties, as well as the fertile, agricultural South Valley, make this location ideal for processing, warehousing, and manufacturing of products, which could range from local produce to high tech hardwear. The adjacent railroad and Interstate, along with the proximate Sunport cargo facilities mean products can be imported and exported in any given timeframe and with ease. The near term extension of Sunport Boulevard will create additional direct access to Interstate 25, generating additional potential for economic growth.

04 STUDY BOUNDARY



05 RELEVANT ZONING

Below is a brief overview of the zoning regulations that apply within the Sunport Commerce Center study area.

M-1 Light Industrial Zone
The purpose of this zone is primarily for light manufacturing, light fabricating, warehousing, and wholesale distribution with off-street loading and off-street parking for employees, and with access to arterial highways or railroads. Uses permitted within the M-1 zone include bottling plants, cold storage plants, foundries, laboratories, warehousing, and food processing, among others.

M-2 Heavy Manufacturing Zone
The purpose of this zone is to provide for industrial operations of all types except that certain potentially hazardous or nuisance-type industries as specified in Subsection B.2. below are permitted only after public hearing and review to ensure protection of the public interest and surrounding property and persons. Permitted uses include those under M-1, along with Iron and steel foundries, manufacturing, milling, railroad repair, and salvage yards.

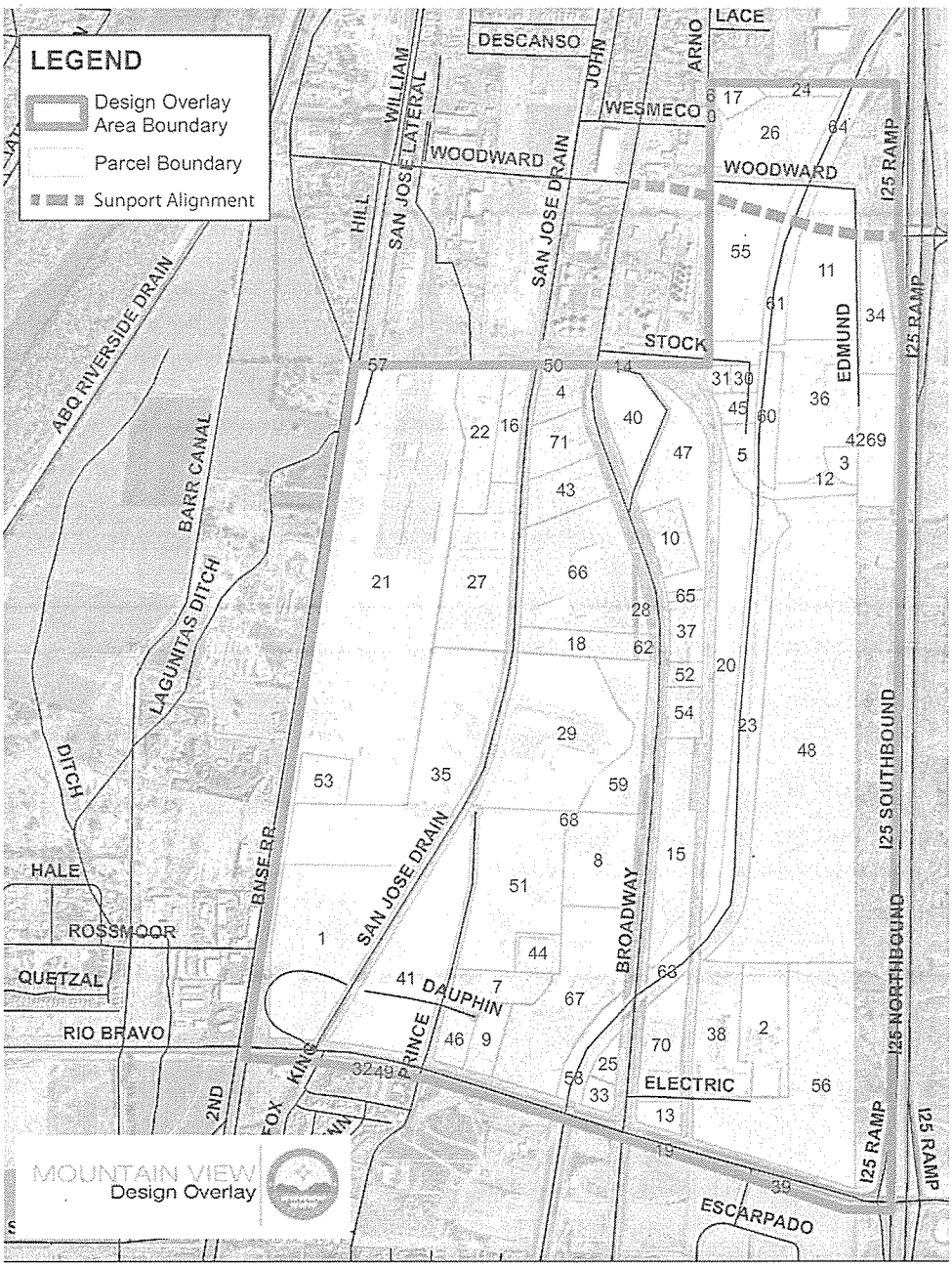
***SD/MV-TOD Sector Development Mountain View Transit-Oriented Development Zone**
This zone allows a mixture of uses controlled by the Bernalillo County/International Sunport Station Area Sector Development Plan. Its purpose is to provide higher density residential and mixed-use development with retail and employment in a pedestrian-oriented area and with ready access to commuter rail and other transit amenities. Allowable building heights are a maximum of 60 feet, while residential densities are allowed to reach 60 du/ac, or a building FAR of 2.0.

*This area is adjacent to but not a part of the study area.

M-1 Light Manufacturing
M-2 Heavy Manufacturing
SD/MV-TOD Sector Development Mountain View Transit-Oriented Development Zone
Feet
0 250 500 1,000

06 AFFECTED PARCELS

71 property parcels lie within the Design Overlay area boundaries. The numbers in the illustration below reference the assessor data listed in the following pages.



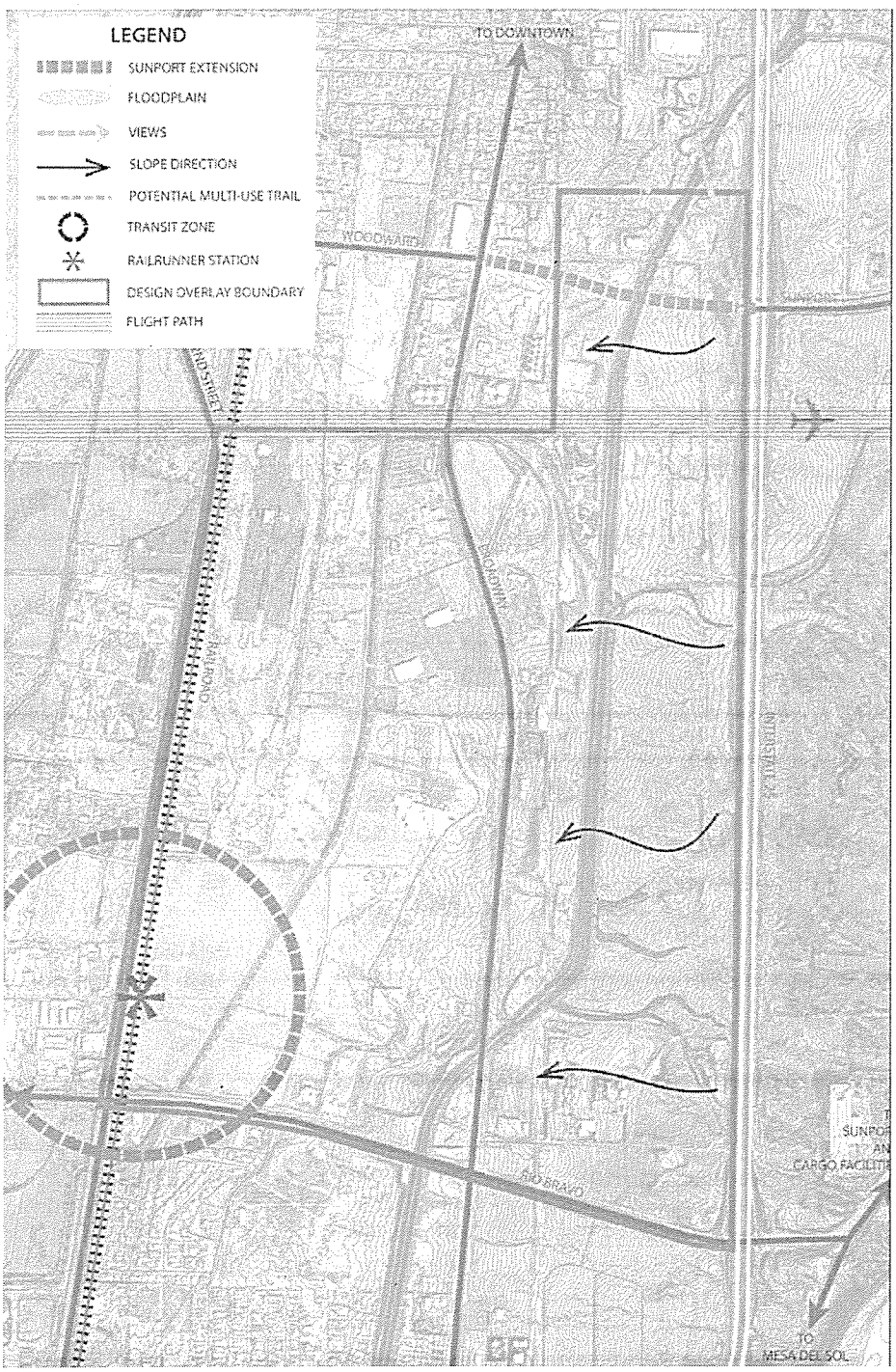
FID	UPC	Legal Description	Area (acres)	Owner
0	101405537822310205	* 012 C SO BROADWAY AC U1 VAC AVE E LOT12	.498	RIOS PABLO & PATRICIA CASILLAS
1	101405406504330112	TRACT 1A1 MAP 49 & TR 2A1 MAP 50 & TR 2B1B MAP 50 CONT 30.8045 AC M/L	30.94	SCHWARTZMAN INC
2	101405344848010539CA	TR 2 PLAT OF TRACTS 1 & 2 OF LANDS OF PERSON STATION BEINGA REPLAT OF TRACT 1-B OF MRGCD MAP NO 45 CONT 10.0000 AC	11.38	PUBLIC SERVICE CO OF NM
3	101405450941810511	TR A 3 & TR IN NE1/4 NE1/4 SEC 5 T9N R3E CONT 1.87ACTR A-3 IN NE1/4 NE1/4 IN SEC 5 CONT 2.132 AC (92,870 SQ FT)	2.00	SCHWARTZMAN INC
4	101405425650330255	THE N POR OF TR 22C1 MRGCD MAP # 45 (AKA PARCEL A LANDS OF FRANCIS W GREEN) CONT 5.00 AC M/L	4.08	CARRETE ALFONSO & SYLVIA
5	10140544194521064	LOT 4 PLAT OF LOTS 1 THRU 4 BACA ACRES BEING A REPLAT OF A PORTION OF TR 24-A1-A2 MRGCD MAP NO 45 CONT 2.224 AC M/L	5.76	W STOCK LTD TRUST
6	101405537125310228	LOT C BLK C REPL OF LTS 9 10 & 11 IN BROADWAY ACRES UNIT 1 CONT 45,786 SQ FT M/L	1.29	DFA LLC
7	101405321048020221	W'LY PORT OF TR C-2-A CORRECTED PLAT OF TRACTS C-1-A-1,C-1-B-1, C-2-A & C-3-A SCHWARTZMAN INDUSTRIAL CENTER (BEING REPLAT OF TRACTS C-1-A, C-1-B, C-3 SCHWARTZMAN INDUSTRIAL	6.20	SCHWARTZMAN INC
8	101405429008440110	TR C-1-B-1 EXCL NW'LY PORT CORRECTED PLAT OF TRACTS C-1-A-1,C-1-B-1, C-2-A & C-3-A SCHWARTZMAN INDUSTRIAL CENTER (BEINGA REPLAT OF TRACTS C-1-A, C-1-B, C-2, C-3 SCHWARTZMAN	12.20	SCHWARTZMAN INC
9	10140531894592023	MRGCD MAP 50 TRACT 2A3A1 CONT 3.81 AC	3.93	ALEXANDER GLEN ETUX
10	101405436838710210	MRGCD MAP 45 TRACT 24 A2 CONT 5.0 AC	5.12	STATE HIGHWAY DEPT
11	101405548507740629	TR IN E/2 SE/4 T10N R3E SEC 32 CONT 20.402 AC M/L OR 888,711 SQ FT M/L	18.23	SCHWARTZMAN INC
12	101405449440310510	NE1/4 NE1/4 SEC 5 TRN R3E	0.53	S E C CORPORATION NORTON BLDG FLOOR 16
13	10140533543961044	N'LY PORT TR 1A3 MRGCD MAP 50 (AKA N'LY PORT TR 9 LANDS OFDURAND) CONT 2.5146 AC	2.28	HERRERA LOUIS & ELIZABETH
14	101405431052910315	MRGCD MAP 45 TRACT 22C2B1B CONT .2000 AC	0.12	SCHWARTZMAN INC
15	101405436512340310	POR OF TR 1A MRGCD MAP 50 & POR OF TR 24A1A1 MRGCD MAP 45 CONT 13.711 AC +-	14.12	SCHWARTZMAN INC
16	101405420946720115	MAP 45 TR 22A1 CONT 5.6710 AC M/L OR 247,029 SQ FT M/L	5.28	SCHWARTZMAN INC
17	101405540725440238	POR OF SMALL HOLDING CLAIM # 1261 SEC 32 T10N R3E	3.17	WILD WEST BROADCASTING CORP
18	101405427527930239	PARCEL C1 CLIFFORD METROPOLITAN CENTER UNIT 1 CONT 5.6524 ACM/L	5.69	DEALERS AUTO AUCTIONS OF ALBUQUERQUE, INC.

FID	UPC	Legal Description	Area (acres)	Owner
19	10140533463581025	PORT TR 1A3 MRGCD MAP 50 CONT 1.4971 AC	1.96	HERRERA LOUIS & ELIZABETH
20	101405441224210720	POR OF TR 24A1A1 MRGCD MAP 45 & POR OF TR 1-A MRGCD MAP 50 (AKA AMAFCA PARCELS S-8-1-X, S-8-1-Y & S-8-1-W) CONT 22.011 AC +-	20.47	AMAFCA
21	101405409431820109CA	POR NW & POR NW SW T9N R3E SEC 5 CONT 100.4000 AC	96.23	BURLINGTON NORTHERN & SANTA FE RAILWAY COMPANY THE
22	101405418447620114	MAP 45 TR 22 B	10.27	BAKER COMMODITIES INC
23	10140544262394061	PARCEL 4 PLAT OF A M A F C A SOUTH DIVERSION CHANNELDRAINAG E RIGHT OF WAY PHASE 1 RIGHT OF WAYPARCELS 1 THRU 10 CONT 22.3918 AC	23.59	AMAFCA
24	101405546125840220	TR IN N 1/2 N 1/2 S32 10N 3E CONT 3.750 AC	4.31	SCHWARTZMAN INC
25	10140533074541074	*1 HARMS INDUSTRIAL PARK COMPRISING TRS 2A3B & 2A3C MRGCD MAP 50 TOGETHER WIT	1.60	RODGERS CLARENCE ETUX
26	101405544720740217	TR IN N1/2 NE 1/4 SE 1/4 LESS FOR TO AMAFCA SEC 32 T10N R3ECONT 18.290 A	13.39	SCHWARTZMAN INC
27	101405418533920110	PARCEL B1 CLIFFORD METROPOLITAN CENTER UNIT 1 CONT 18.7585 AC M/L	18.71	DEALERS AUTO AUCTION OF ALBUQUERQUE, INC
28	10140543373071085	PARCEL A-2-A CLIFFORD METROPOLITAN CENTER UNIT 1 CONT 0.9772 AC M/L OR 42,567 SQ FT M/L	0.90	SCHWARTZMAN INC
29	101405426019630238	WEST PORTION OF TRACT A CORRECTED PLAT OF TRACTS A, B,& C SCHWARTZMAN INDUSTRIAL CENTER CONT 34.2844 AC	32.37	UNITED STATES POSTAL SERVICE WESTERN FACILITIES SERVICE OFFICE
30	10140544215161062	LOT 2 PLAT OF LOTS 1 THRU 4 BACA ACRES BEING A REPLAT OF A PORTION OF TR 24-A1-A2 MRGCD MAP NO 45 CONT 1.000 AC M/L	1.45	W STOCK LTD TRUST
31	10140544055161061	LOT 1 PLAT OF LOTS 1 THRU 4 BACA ACRES BEING A REPLAT OF A PORTION OF TR 24-A1-A2 MRGCD MAP NO 45 CONT 1.000 AC M/L	0.96	W STOCK LTD TRUST
32	101405306740320314	TRACT 3 UNIT 1 SCHWARTZMAN INDUSTRIAL PARK TRS 1, 2, 3, 4 &5 REPL OF 1A3 MRGCD MAP 50 CONT 3.186 AC M/L	3.11	ENACON CORPORATION C/O PROPERTY VALUATION SERVICES
33	10140532934201078	LT 2 HARMS INDUSTRIAL PARK COMPRISING TRS 2A3B & 2A3C MRGCDMAP 50 TOGETHE	1.74	PELIGRO LLC
34	10150550140483015	TRACT OF LD WITHIN THE W/2 W1/2 OF SW1/4 SW/4 SEC 33 T10NR3E EXC THOSE PORTIONS OUT TO R/W FOR I-25 CONT 3.52 AC	7.40	SCHWARTZMAN INC
35	101405416814530115CA	PARC B2 CLIFFORD METROPOLITAN CENTER UNIT 1 & TR 2B1A MAP 50 CONT 37.0000 AC M/L	36.50	ATCHISON TOPEKA & SANTA FE RAILWAY CO
36	10140544884651059	MAP 45 TR 24 A1A3 EXC POR OUT TO AMAFCA CONT 21.49 AC	21.33	VAN WATERS & ROGERS INC% TAX DEPT
37	10140543772861024	THE NLY 520 FT M/L OF THE SLY 1900 FT M/L OF TR 24 MRGCD MAP#45 LYING E OF & ADJ TO BRAODWAY BLVD SE CONT 3.00 AC M/L	4.01	RITEWAY PROPERTIES CO LLC

FID	UPC	Legal Description	Area (acres)	Owner
38	101405340547010538CA	TR 1 PLAT OF TRACTS 1 & 2 OF LANDS OF PERSON STATION BEINGA REPLAT OF TRACT 1-B OF MRGCD MAP NO 45 CONT 11.9369 AC	12.39	PUBLIC SERVICE CO OF NM
39	101405344726540313	MAP 50 PORT OF TR 1A & TR IN N/2 SE/4 SEC 8 T9N R3E CONT 51.7600 AC M/L OR 2,254,666 SQ FT M/L	51.32	RIO 25 LLC
40	101405432848610310	TR 22C2B1C MRGCD MAP 45 CONT 7.618 AC	8.05	SCHWARTZMAN INC
41	10140541370073031	TRACT B CORRECTED PLAT OF TRACTS A, B & C SCHWARTZMANINDUSTRIAL CENTER CONT 26.1733 AC	26.29	SCHWARTZMAN INC
42	101405452143610513	TR A 1 IN NE NE SEC 5 T9N R3E CONT 0.213 AC	0.16	S E C CORPORATION
43	101405426042930250	TRACT 22-C-2 REPLAT OF THE NORTHERLY PORTION OF TRACT 22-C MRGCD MAP 45 CO	6.74	BOYER KENT D & CHARLOTTE F
44	101405423000130241	TR C-1-A-1-B PLAT OF TRACTS C-1-A-1-A & C-1-A-1-BSCHWARTZMAN INDUSTRIAL CENTER CONT 3.3443 AC	3.36	3800 PRINCE STREET LLC
45	10140544154891063	LOT 3 PLAT OF LOTS 1 THRU 4 BACA ACRES BEING A REPLAT OF A PORTION OF TR 24-A1-A2 MRGCD MAP NO 45 CONT 2.000 AC M/L	2.26	W STOCK LTD TRUST
46	10140531704582081	TR C-3-A CORRECTED PLAT OF TRACTS C-1-A-1, C-1-B-1, C-2-A &C-3-A SCHWARTZMAN INDUSTRIAL CENTER BEING A REPLAT OFTRACTS C-1-A, C-1-B, C-2, C-3 SCHWARTZMAN INDUSTRIAL	3.10	RIO GRANDE CREDIT UNION
47	101405436943710220	MAP 45 TR 22C2B2A & PORT OF TR A4A1A1 & PORT OF OLD ROAD CONT 11.6790 AC M/L OR 508,737 SQ FT M/L	14.15	SCHWARTZMAN INC
48	101405447220040547	PORTION OF TRACT 1A MAP 50 & PORTION OF TRACT 24A1A1 MAP 45CONT 85.7580 AC M/L	84.88	RANDEL RON L TRUSTEE
49	10140531144012035	TRACT 2 UNIT 1 SCHWARTZMAN INDUSTRIAL PARK TRS 1, 2, 3, 4 &5 REPL OF 1A3 MRGCD MAP 50 CONT 2.00 AC M/L	2.00	TK REALTY LLC
50	101405425953030260	MRGCD MAP 45 TRACT 22C2B1A CONT 0.19 AC	0.20	SCHWARTZMAN INC
51	101405421104630240	TR C-1-A-1-A PLAT OF TRACTS C-1-A-1-A & C-1-A-1-BSCHWARTZMAN INDUSTRIAL CENTER CONT 24.3874 AC	24.47	SVRB INVESTMENTS LLC
52	10140543762501025	THE NLY 224 FT M/L OF THE SLY 1370 FT M/L OF TR 24 MRGCD MAP#45 LYING E OF & ADJ TO BRAODWAY BLVD SE CONT 1.3445 AC M/L	1.58	RITEWAY PROPERTY COMPANY LLC
53	101405404515130103CA	T9N R3E SEC 5 CONT 4.5000 AC	4.59	AT & SF RAILROAD
54	101405437721840335	THE SLY PORTION OF TRACT 24A1B MRGCD MAP 45 CONT 2.8718 AC	3.40	HITE ALFRED C & SHELBY J
55	10140554140984055	TR IN E/2 SE/4 SE/4 LESS PORT TO AMAFCA T10N R3E SEC 32 CONT 21.3060 AC M/L OR 928,089 SQ FT M/L	20.54	SCHWARTZMAN INC

FID	UPC	Legal Description	Area	Owner
56	101405349543510501CA	A TR OF LAND BEING SITUATE WITHIN TR 4 SCHWARTZ-MAN INDUSTRIAL PARK WITHIN SECS 5 & 8 T9N R3E & PORTS OF TR1-A MRGCD MAP 50 & TR 24A-1 MAP 45 (AKA SCHWARTZMAN	37.10	PUBLIC SERVICE CO OF NM
57	101405511626130322CA	TR OF LAND WITHIN THE W1/2 SEC 32 T10N R3E EXC A NW'LY5.0769 AC PARCEL OUT TO TRS 1 & 2 LANDS OF B.N. & S.F RAILWAY CO CONT 46.2788 AC	34.83	UNION CARBIDE CORP LINDE DIV % DOW CHEM CO TAX DEPT APB BLDG
58	10140532804561081	PARCEL 2 PLAT OF A M A F C A SOUTH DIVERSION CHANNELDRAINAGE RIGHT OF WAY PHASE 1 RIGHT OF WAYPARCELS 1 THRU 10 CONT 5.5084 AC	5.53	AMAFCA
59	10140543271904011	EAST PORTION OF TRACT A CORRECTED PLAT OF TRACTS A, B&C SCHWARTZMAN INDUSTRIAL CENTER CONT 8.5470 AC	10.07	UNITED STATES POSTAL SERVICE WESTERN FACILI-TIES SERVICE OFFICE
60	10140544384751091	PARCEL 5 PLAT OF A M A F C A SOUTH DIVERSION CHANNEL DRAINAGE RIGHT OF WAY PHASE 1 RIGHT OF WAYPARCELS 1 THRU 10 CONT 5.8618 AC	5.64	AMAFCA
61	10140554500944071	PARCEL 6 PLAT OF A M A F C A SOUTH DIVERSION CHANNELDRAINAGE RIGHT OF WAY PHASE 1 RIGHT OF WAYPARCELS 1 THRU 10 CONT 7.4980 AC	7.03	AMAFCA
62	101405433627510810	PARCEL C2 CLIFFORD METROPOLITAN CENTER UNIT 1 CONT 25,652 SQ FT M/L	0.59	DEALERS AUTO AUCTION OF ALBUQUERQUE, INC.
63	10140533585221091	PARCEL 3 PLAT OF A M A F C A SOUTH DIVERSION CHANNELDRAINAGE RIGHT OF WAY PHASE 1 RIGHT OF WAYPARCELS 1 THRU 10 CONT 2.5861 AC	2.71	AMAFCA
64	10140555132464081	PARCEL 7 PLAT OF A M A F C A SOUTH DIVERSION CHANNELDRAINAGE RIGHT OF WAY PHASE 1 RIGHT OF WAYPARCELS 1 THRU 10 CONT 9.1267 AC	8.02	AMAFCA
65	10140543713181023	NLY PORTION OF TRACT 24B MRGCD MAP 45 CONT 0.5268 AC	0.67	RITEWAY PROPERTIES CO LLC
66	101405427526530245	PARCEL A1 CLIFFORD METROPOLITAN CENTER CONT 24.023 AC M/L	23.96	DEALERS AUTO AUCTION OF ALBUQ INC
67	101405325051520220	TR C-2-A EXCL W'LY PORT CORRECTED PLAT OF TRACTS C-1-A-1,C-1-B-1, C-2-A & C-3-A SCHWARTZMAN IN-DUSTRIAL CENTER (BEINGA REPLAT OF TRACTS C-1-A, C-1-B, C-2, C-3 SCHWARTZMAN	24.88	SCHWARTZMAN INC
68	101405427011540111	NW'LY PORT OF TR C-1-B-1 CORRECTED PLAT OF TRACTS C-1-A-1,C-1-B-1, C-2-A & C-3-A SCHWARTZ-MAN INDUSTRIAL CENTER (BEINGA REPLAT OF TRACTS C-1-A, C-1-B, C-2, C-3 SCHWARTZMAN	0.27	SCHWARTZMAN INC
69	10150540355002012	POR OF LAND IN SEC 4 T9N R3E CONT 2.36 AC	9.14	U S A DEPT OF ARMY HDQRS 377 CEG/CERR
70	10140533574551064	MAP 50 POR TR 1A SOUTH OF AMAFCA SOUTH DIVER-SION CHANNELL CONT 8.630 AC	8.82	GASKIN JOHN E ETUX
71	101405426146530265	THE S POR OF TR 22C-1 (AKA PARCEL B LANDS OF FRANCIS W GREEN) MRGCD MAP #45 CONT 5.0 AC M/L	5.85	BARROW MARK E & TONI T

07 SITE ANALYSIS



CONSTRAINTS

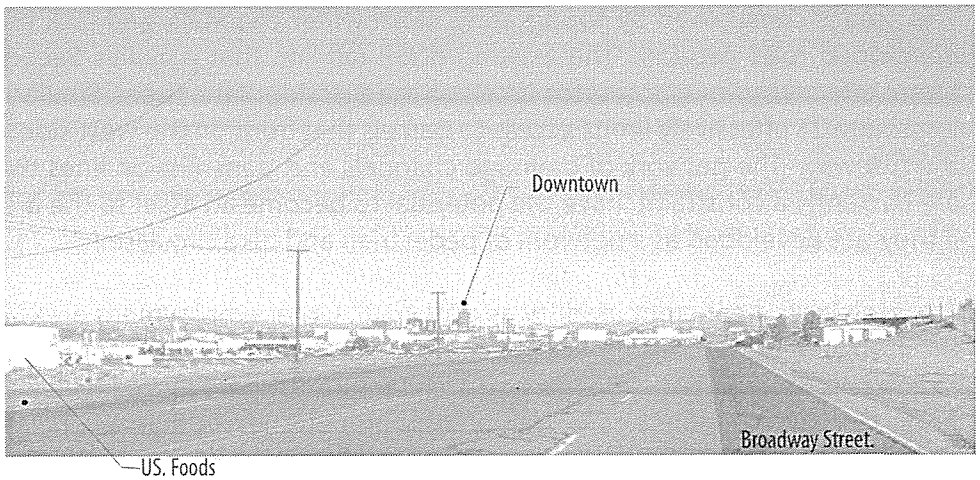
- Topography (slope)
- Floodplain
- Limited access to Rio Bravo
- Railroad easement limits 2nd St access
- Transmission lines
- BNSF contamination
- Adjacent oil refineries
- Airport flight path (noise & height regulations)

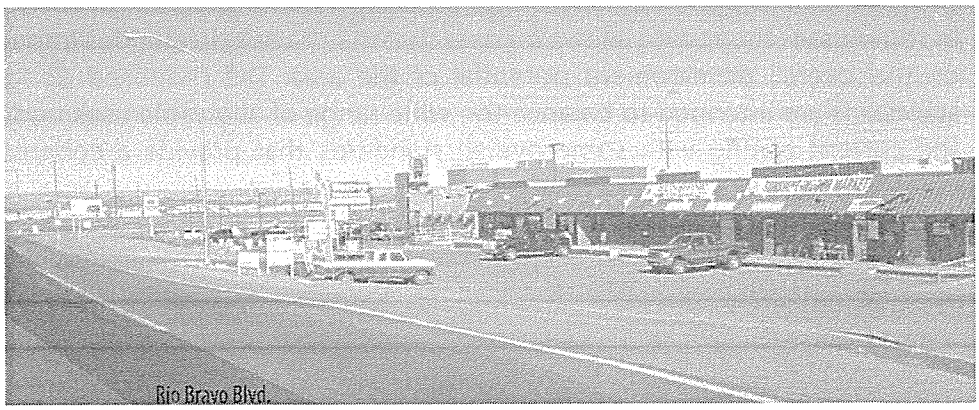
OPPORTUNITIES

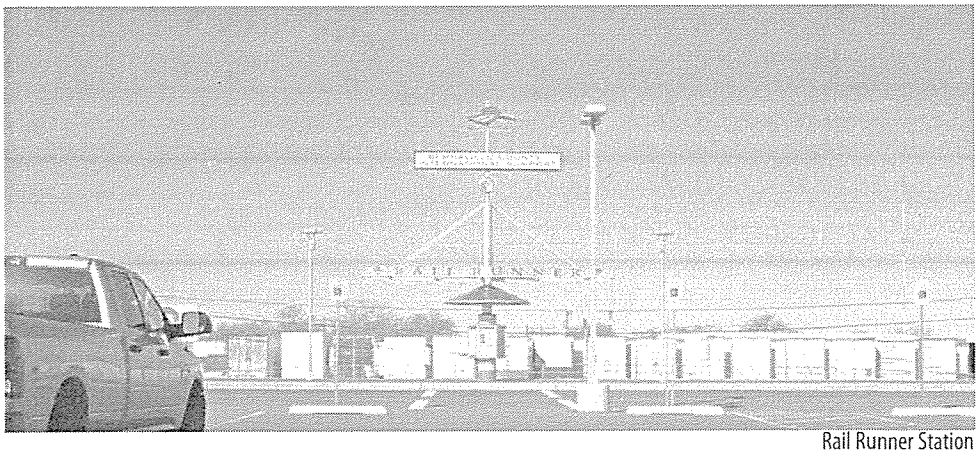
- I-25 access/frontage
- Rio Bravo access
- 2nd St access
- Broadway access
- Railrunner station
- Transit-oriented development
- Views (valley, mountains, volcanoes, downtown)
- Abundant vacant land
- Airport proximity
- Mesa del Sol proximity
- Air cargo facilities proximity
- Arroyos (open space)
- Bosque proximity
- Proximate agriculture

The area is constrained by topography, stormwater channels, and lack of a developed road network. The existing BNSF rail line that parallels Second Street effectively limits access to parcels on the east side of the street. Similarly, Interstate 25 effectively limits access to parcels that front on the west side of the freeway. The network of drainage channels and transmission lines that are currently a constraint, have the potential to become an asset to the area if they are developed as a network of pedestrian and bike circulation.

The area lacks a coherent identity as a "district". Other employment areas in the metropolitan area have a consistent set of standards for components such as lighting, landscaping, signage, and architecture. Upper Mountain View in its current state is more a collection of disparate businesses than a cohesive district. Existing County zoning, mostly M-2 (Heavy Manufacturing), along with some M-1 (Light Manufacturing) uses allows for a wide range of uses. In some cases the zoning allows for uses that may have a deleterious impact on the overall development potential of the area. The proposed design standards are intended to balance the wide range of allowable uses under the current zoning with some overall standards that provide a coherent identity for the area.







Rail Runner Station