

CITY OF ALBUQUERQUE



August 2, 2010

Mr. Doug Peterson, Chair
Environmental Planning Commission (EPC)
City of Albuquerque Planning Department
600 2nd St. NW
Albuquerque, NM 87102

Re: EPC Hearing on Project #1001620, 10 EPC-40039: Amendment to Zoning Code or Subdivision Regulations text, proposing to remove the requirement to conduct an Air Quality Impact Analysis (AQIA) or assessment as a precondition for certain land use approvals.

PO Box 1293

Dear Mr. Peterson,

Albuquerque

The Environmental Health Department (EHD) was involved in the development of and fully supports the current proposal before the EPC, to remove the requirement to conduct an AQIA or assessment for Carbon Monoxide (CO) as a precondition for certain land use approvals. This proposal is scheduled for hearing before the EPC on August 12, 2010.

NM 87103

The development requirement for CO analysis (AQIA) was adopted in 1990 when Albuquerque and Bernalillo County were in nonattainment for CO, and this was one strategy put in place to mitigate this problem. As stated in the ordinance, "attainment and maintenance of the National Ambient Air Quality Standards (NAAQS) can be significantly influenced by area and site-specific land use decisions". So this ordinance was designed to "estimate the magnitude of impact that certain land uses may have, and use this information in the decision process . . . to prevent deterioration of air quality" (i.e. reduce trip generation, trip length, congestion, etc.).

www.cabq.gov

However, local CO levels have been steadily declining, and no violation of the Federal 8-hour CO standard has occurred in Bernalillo County since 1991. Emissions limitations have been put into place at both the federal and local levels to reduce and fully control ambient carbon monoxide levels. The current transportation related pollutant of concern is ground level ozone, which this ordinance can not address, as ozone is generated on a large scale and cannot be controlled on a project-by-project basis. The AQIA requirement has no practical value for the Air Quality Division of this department and it requires an unnecessary expenditure of limited resources to implement and verify.

Therefore, the Environmental Health Department is in full support of Council Bill No. O-10-9 and recommends that the requirement for an Air Quality Impact Analysis be repealed as a precondition for certain land use approvals.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Lou Leonard". The signature is fluid and cursive, with the first name "Mary" being the most prominent.

Mary Lou Leonard, Director
Environmental Health Department

cc: Laurie Moyer, Vice Chair, EPC
Deborah Stover, Director, Planning Department
Catalina Lehner, Senior Planner, Planning Department
Margaret Nieto, Control Strategies Supervisor, Air Quality Division
Neal Butt, Environmental Health Scientist, Air Quality Division