

UNIVERSITY HEIGHTS ASSOCIATION

105 Stanford, SE
Albuquerque, NM 87106

August 11, 2016

Donald R. Koski, Director
Planning & Program Development
U.S. Department of Transportation
Federal Transit Administration - Region VI
Fritz Lanthan Federal Building
819 Taylor Street, Suite 14A02
Fort Worth, TX 76102



Dear Mr. Koski:

The purpose of this letter is to present evidence demonstrating that, because of the significant and substantial impact the project will have on the environment around the proposed ART corridor, the Albuquerque Rapid Transit (ART) project should not maintain its categorical exclusion (CE) granted by the FTA in August 2015. We understand that you have recently testified that the FTA is re-evaluating the appropriateness of the approval of the CE pursuant to its responsibility under 23 C.F.R. 771.129.

In that regard, we are attaching the following:

UHA letter to ABQ Ride regarding ART– December 18, 2014

UHA letter to Mayor Berry regarding Lead and Coal Safety problems – March 16, 2015

UHA letter to Mayor Berry and ABQ Ride - May 14, 2015

UHA letter to Therese McMillan (FTA) - October 21, 2015

The University Heights (neighborhood) Association (UHA) urges the FTA to specifically incorporate into its post-decision review our documented pre-decision concerns about significant environmental impacts on residential streets and on pedestrians crossing Central. **We specifically request FTA's response to those pre-decision letters and to this letter.**

Our neighborhood's northern border is Central Avenue. Lead and Coal Avenues, two of the City's three proposed alternate routes for diverted traffic, traverse the length of our neighborhood. Our neighborhood is highly urban, walkable, bikeable, and transit oriented. We have worked for decades to improve transportation options for residents of our neighborhood and areas along the Central corridor.

UHA participated in the planning of ART since January 2013, including neighborhood meetings and board discussions. We were active participants in the City's public outreach. In March 2013, UHA specifically communicated to the City that we opposed

plans to eliminate Central Avenue landscaped medians and to reduce traffic lanes . Various UHA residents participated in the round 3 City ART meetings in October and November 2014. Some of the concerns are included in the City's Categorical Exclusion (CE) Appendix B Public Involvement. Because the City meetings were inadequate and were not responsive to concerns and opposition being expressed, we invited ABQ Ride officials to a neighborhood-conducted meeting on November 10, 2014 (meeting #13 listed on page 2 of CE Appendix B). The UHA December 18, 2014 letter to ABQ Ride summarized some of the unresolved concerns, including that reducing vehicle lanes on Central would directly impact residential streets. While some of those "neighborhood impacts" comments are included in CE Appendix B, the only response was: "Traffic models will predict the effects of traffic on neighboring areas and will be considered as part of the design." (Pages 9 and 17). However, City officials ultimately told us that the north-south streets and Silver were explicitly excluded from the traffic models.

After the January 2015 crash of a City transit bus into a home on Coal Avenue, and many other accidents on Lead and Coal Avenues around that time, UHA's in its March 16, 2015 letter to Mayor Berry and ABQ Ride asked that life-threatening traffic safety problems on Lead and Coal Avenue be addressed. The City left those problems unaddressed even though they would be worsened with the diversion of Central Avenue traffic caused by ART.

Because of the continuing City lack of response to those concerns, we had another neighborhood-conducted meeting with ABQ Ride officials on May 5, 2015. Our May 14, 2015 letter to Mayor Berry and ABQ Ride specifically stated that we could not support the ART proposal, largely because of environmental impacts on residential streets (traffic safety, illegal and harmful vehicle noise, unregulated transit of overweight vehicles in close proximity to homes, etc).

Technical Supplement 4: Noise and Vibration states: "The study area for the assessment of noise is defined as 250 feet from the proposed Central Avenue BRT alignment centerline." Page 4. Thus, the residential streets and residences that will be impacted by traffic diversion from Central are specifically excluded from the study. Further, none of the receiver/monitor sites in that study were in the University area.

Review of the City's ART application showed that our concerns and opposition were not adequately considered or included. For example, the CE Worksheet states: "*Impacts to community cohesion, neighborhood access, or other community impacts are not anticipated.*" Page 6. There is no mention that UHA repeatedly gave evidence to the contrary throughout the ART process. On page 7 of the CE Worksheet, regarding intense public discussion, concern, or controversy, the "No" box is checked. Based on UHA's experience and interaction at public meetings and letters, that statement is clearly incorrect.

Because the City had not adequately considered our environmental concerns in its application, CE, and related traffic and noise and vibration studies, on October 21, 2015 we wrote the FTA Acting Administrator (and Regional Administrator Robert Patrick)

outlining those concerns and expressing our opposition to ART as proposed. We were unaware that the CE had already been granted.

Our continuing involvement with the ART process reinforces those concerns and UHA's opposition to ART. In addition, we were repeatedly told by ABQ Ride officials that the mature trees we advocated being maintained in the Central Avenue median in our area would be preserved, except for the four that would be removed for the Cornell ART station. We understood that those four trees would be replaced. The CE worksheet specifically states: *Trees removed by construction will be replaced on a 1:1 ratio.* Page 18. However, we have now been informed that those statements are not correct. All of the mature trees in the median in our area are being eliminated, and they are not all being replaced.

We were told by ABQ Ride officials that sidewalks in our area would not be replaced, but that, where necessary, they would be repaired to meet ADA requirements. The CE Worksheet states: *"Sidewalk ramps at street and drive pad intersections will be reconstructed to meet ADA standards from Coors Boulevard to 10th Street and from Broadway Boulevard to Louisiana Boulevard."* Page 4. We have now been informed that non-ADA compliant sidewalks and drive pads on the south side of Central in our area will not be repaired.

We are deeply concerned that our letters to the City were not conveyed to the FTA with the CE Worksheet and Small Starts application and that the City purports that the public involvement process demonstrated no intense public concern. We are further concerned about continuing changes to ART since the public meetings and the application submittal that further negatively impact this neighborhood.

We are grateful for the opportunity to now convey our letters to the City directly to the FTA. Our intense concern remains. The City has offered no mitigation for the impacts on residential streets. And we are very troubled by the City's continuing representation that Lead and Coal Avenues - residential, route-restricted streets - can handle any and all traffic diverted from Central Avenue - a busy commercial street which, moreover, is also a truck route.

Again, we specifically request FTA's response to those letters and to this letter

We would be pleased to discuss this matter further with you or other FTA officials. Our mailing address is on the letterhead. Email us at: info@uhanm.org and srcidn@earthlink.net. Phone to Don Hancock at 505/262-1862.


Sincerely,



Joe Gallegos



Julie Kidder



Joseph Aguirre



Marlene Brown



Don Hancock



Sherry Smith



Brian Stinar



Eugene Trosterud

Attachments:

- * UHA letter to ABQ Ride regarding ART– December 18, 2014 – 2 pages
- * UHA letter to Mayor Berry regarding Lead and Coal Safety problems – March 16, 2015 – 2 pages
- * UHA letter to Mayor Berry and ABQ Ride - May 14, 2015 – 3 pages
- * UHA letter to Therese McMillan (FTA) - October 21, 2015 – 5 pages

cc: Mayor Richard Berry
Rep. Michelle Lujan-Grisham
Sen. Martin Heinrich
Sen. Tom Udall