

UNIVERSITY HEIGHTS ASSOCIATION

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October 21, 2015

Ms. Therese McMillan
Acting Administrator
Federal Transit Administration
1200 New Jersey Avenue, SE
Washington, DC 50590

RE: City of Albuquerque Small Starts Application

Dear Administrator McMillan:

The University Heights Association (UHA), which represents one of the historic neighborhoods along East Central Avenue between Yale and Girard in Albuquerque, opposes the City of Albuquerque's proposal, dated July 31, 2015, for Central Avenue Bus Rapid Transit (BRT).

Our major concerns are the following:

1) Process:

a. Although in some respects the City's community outreach has been commendable, unfortunately project design largely has been done section by section as if design elements in one neighborhood would not have effects on another. This process therefore has been inherently divisive. A citizen's advisory group consisting of neighborhoods and stakeholders along Central Avenue would have helped assure that competing needs and interests were productively and successfully addressed.

b. The City's BRT proposal, especially in the section of East Central where vehicle lanes would be reduced from two to one in each direction, would radically effect traffic not just on Central but on nearby neighborhood streets. This effect is not considered in the application, since the Travel Forecasting and Technical Supplement #2 VISSIM Analysis calculates the Level of Service (LOS) to be adequate so that no significant traffic diversion would occur. The Categorical Exclusion also does not address this and other major issues. Thus, neither funding for this project nor the City's Transit Department apart from this project would address those effects. Furthermore, City administration outside of the Transit Department does not appear to have addressed nor made a commitment to address possible BRT effects on neighborhood streets.

2) Priorities for Mass Transit in Albuquerque:

a. In our neighborhood we see more bus-riders than probably any other area in the City. Many of us use public transportation including the City's Central Avenue Rapid Ride (express) service. We do not share the City's opinion that a Central Avenue BRT system is a critically needed enhancement to mass transit in Albuquerque. Instead, we favor improved north-south service with connectivity to Central Avenue and the development of express east west service on other corridors besides Central.

b. We support a role for BRT in Albuquerque's mass transit future. However, for multiple reasons, we conclude that a more appropriate roll-out would be along the previously recommended University Boulevard (Airport) route in the UNM/CNM/Sunport Study done during 2012-2013. The application for that project was not submitted because of the subsequent Central Avenue BRT plan.

3) Cost benefit analysis: The City's Central Avenue BRT design constitutes a radical transformation of Central Avenue, of its relationship to surrounding neighborhoods, and of traffic throughout the area. We have heard the City address the purported benefits of this project. At the same time we are all aware of its stated dollar costs. However, we have not heard the City address non-dollar costs: it has neither recognized them nor made a commitment to address them. Some of the more critical non-dollar costs are addressed below. Lacking a fully public consideration of this cost-benefit analysis (what is the cost to neighborhoods of the increment of benefit along Central?), we cannot support the City's proposal.

4) Safety:

a. Especially for the section of East Central where vehicle lanes are reduced from two to one in each direction, the City's proposal will significantly divert traffic to alternative east-west routes most of which are largely residential. This is especially the case given plans to preserve or create street-side parallel parking for most of this section and that regular Route 66 bus service will continue. We believe that the City's traffic study underestimates this effect. And we note that given the proposed changes on Central are fixed, these effects are 24/7 irrespective of when BRT is operational or not.

b. South of Central Avenue from Morningside to Broadway, the highest volume and most proximate east-west alternative routes are Lead and Coal Avenues. Although Lead and Coal are preponderantly residential (there are no more than perhaps 20 businesses and institutions along this section) the City made them one-way arterials decades ago. Surrounding residents and neighborhoods have been concerned about Lead and Coal safety since. In response to years of community mobilization and with federal funding support, the City re-designed Lead and Coal in a project completed in June 2012. The project was meant to make Lead and Coal safer and better serve the needs of residents, pedestrians, and bicyclists. Substantial street scape improvements were achieved, but safety problems continue: speeding, multiple collisions, and out-of-control vehicles impacting residences.

In January 2015 a collision caused a City transit bus, eastbound on Coal, to crash into a home on the corner of Coal and Girard. Media reports described multiple accidents and high speed along Coal at this intersection. Later, in the spring, there were more accidents causing one media report to describe Coal as a "demolition derby." The City has been asked to address the continuing safety problems on Lead and Coal. Specific changes were proposed by our neighborhood. Unfortunately we are unaware of any meaningful City action to address these critical safety concerns. The City's BRT proposal would add traffic to this unsafe environment and it does not include nor evaluate traffic accident data.

c. We also expect the City's BRT proposal to cause increased north-south traffic through residential neighborhoods as vehicles use alternative east-west routes to approach or leave Central Avenue. Several intersections along these north-south routes have been the site of multiple collisions, but no data on such accidents is included in the application. The City's BRT proposal would add traffic to this unsafe environment.

d. Central Avenue carries a large volume of commercial traffic. Some overweight commercial vehicles already illegally traverse residential streets. This is a particular concern for Lead and Coal between Morningside and Yale where the roadway configuration and right of way are that of a common residential side street. By diverting more commercial traffic to residential streets, the City's BRT proposal would add to this problem. The application includes no information about this problem, nor is any mitigation provided to address this concern.

5) Health:

a. Illegal vehicle noise at decibel levels harmful to human health is a concern along the Central corridor, especially on Lead and Coal with their high volume traffic and proximity to homes. Diversion of traffic to residential streets would add to that harm. The City has not included any discussion of this problem in the application nor in Technical Supplement #4 (Noise and Vibration). Furthermore it has not indicated any plan to monitor vehicle noise nor to systematically enforce its sound ordinance along roadways in our area.

b. Central Avenue conveys a significant number of large and small diesel vehicles as do Lead and Coal. Diversion of traffic from Central would add to residential exposure to diesel exhaust. This is a particular concern for the section of Lead and Coal between Morningside and Yale where the roadway configuration and right of way are that of a common residential side street and where yards and living spaces are feet away from exhaust emissions. The City has not included any discussion of this problem in the application, nor has it indicated any plan to monitor this problem and protect residents from those emissions.

6) Walkability: In part because University Heights adjoins the University of New Mexico campus along Central Avenue, we are one of the most walkable neighborhoods in the

City. Sidewalks are and have been a priority for us. Central Avenue sidewalks are commonly in poor condition so we were happy to hear that plans for BRT included new sidewalks. However, we were concerned to hear that sidewalks in our area, some of them clearly needing repair, would be unchanged. Consequently, we see no plan for comprehensive evaluation of Central Avenue sidewalks, no plan to consistently replace or repair them, and no standard for what an adequate sidewalk is for this area.

7) Sustainability: We are supporters of mass transit including for reasons of the environment. However, we do not accept as a given that this BRT proposal meets sustainability measurements. Some measures to consider: 1) Will BRT reduce vehicle use along the Central corridor or just shift the vehicles from Central to other streets?; 2) How many trees will be cut down for this project and how many will be planted? ; 3) What are the plans for the use of sustainable energy sources in this project?

8) BRT as an economic development driver: We love our City, we love our neighborhood, and we love Central Avenue and want it to thrive. The City is promoting BRT as a way to boost economic development on Central. That would be great, unless benefit for Central Avenue comes at the cost of significant harm to other streets businesses and neighborhoods.

Thank you for the opportunity to provide a community perspective and your consideration of our concerns on this important issue for our city.

Sincerely from the UHA Board of Directors,



Joe Gallegos, President



Julie Kidder, Vice President




Don Hancock, Secretary/Treasurer



Joseph Aguirre



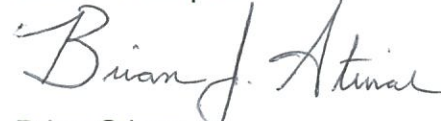
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Senator Martin Heinrich
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