

UNIVERSITY HEIGHTS ASSOCIATION

105 Stanford, SE
Albuquerque, NM 87106



August 9, 2017

Dear City Councilors:

The University Heights Association (UHA) Board of Directors has followed the development of the new Comprehensive Plan and the Integrated Development Ordinance (IDO) with interest, because of our experience with dealing with zoning and related issues for more than 40 years. UHA was very involved in the University Neighborhoods Sector Development Plan in 1978 and the update in 1986. We feel that many provisions of that Sector Plan are still important to the City and promote neighborhood quality of life. During the IDO process, UHA has submitted formal written comments and participated in several meetings and “ask an expert” sessions. UHA appreciates the provisions of the IDO that carry forward some specific requirements of the Sector Plan, including prohibitions on drive-through windows.

However, UHA has a major, unaddressed concern about Blood Plasma Centers. There are three blood plasma centers – one in Barelás at 701 2nd Street, SW; one in south San Pedro at 204 San Mateo, SE; and one in UHA at 122 Yale, SE. The 122 Yale, SE location has been non-conforming and objectionable for the almost 40 years that it’s been in existence, over UHA’s objections (Z-80-61(EA)). On three occasions – 1990 (ZA-90-237), 1998 (AP-97-46/ZA-97-326), and 2010 (10ZHE-80341/10BOA-20015) – attempts to expand the blood plasma center at 122 Yale, SE were all denied because of it being injurious to the neighborhood and because it would be expanding a non-conforming use. Despite UHA’s request, blood plasma centers are not specifically included in the IDO, which means that they will be permissive in all mixed-use and most non-residential zones.

On August 9, Don Hancock, UHA Secretary/Treasurer, discussed the situation with Ben McIntosh of Code Enforcement. Mr. McIntosh stated that blood plasma centers are considered to be similar to doctor’s offices since they don’t have patients staying overnight and are allowed as an O-1 use. He stated that the 122 Yale, SE location does not have adequate parking and landscaping and could not be expanded because of those deficiencies.

Based on the history of 122 Yale, SE, that blood plasma center is injurious to the neighborhood and has been so determined on the three occasions in 1990, 1998, and 2010 that Zoning Hearing Examiners have heard evidence. To have more blood plasma centers in this area and expansion of the existing center is inappropriate and totally unacceptable to UHA. Clearly, this blood plasma center is not at all equivalent to a doctor’s office, and it should not be so considered under the IDO. UHA’s suggestion is that blood plasma centers could be included as light manufacturing since, under Federal Food and Drug Administration regulations (21 CFR 601.20), such biologics licenses are for “good manufacturing practice requirements.” Alternatively, blood plasma centers could be a new use in Table 3-2-1 and be permissive only in the Non-Residential zones.

Thank you for your consideration.

Don Hancock
UHA Secretary/Treasurer
505/262-1862
sricdon@earthlink.net