

CITY OF ALBUQUERQUE

PLANNING DEPARTMENT

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August 28, 2020

Public Service Company of New Mexico (PNM)
Attn: Ken Maestas, Public Participation and Regulatory Relations
2401 Aztec NE, Z200
Albuquerque, NM 87107

RE: Security Wall for West Mesa Switching Station

Mr. Maestas,

We are in receipt of your request for Administrative Approval of a Site Plan per the standards and processes of the City's Rank II *Facility Plan: Electric System Transmission and Generation (2010-2020)* (aka the "Electric Facility Plan").

Request and Background

The request is for the installation of a new perimeter security wall around the existing PNM West Mesa Switching Station with associated landscape. The West Mesa Switching Station has been in this location since 1968, pre-dating any City electric system regulations and standards, including those in the current Electric Facility Plan and any of its previous iterations. There is no existing, controlling Site Plan, so the proposed security wall and landscape are an amendment to a non-conforming "as-built" site plan that would bring it into compliance with the standards of the Electric Facility Plan.

Process

Table 1, Approval Process for Electric Transmission and Substation Facilities – City of Albuquerque, found in the City's Rank II *Facility Plan: Electric System Transmission and Generation (2010-2020)*, details the review and approval processes for requested actions. Because the West Mesa Switching Station is an "as-built" facility that is currently non-conforming as to applicable standards, the proposed change to bring it into conformance with the standards of the Electric Facility Plan is an Insignificant Action that has limited change and the Electric Facility Plan remains essentially the same. Therefore, the approval process is an Administrative Amendment to the "as-built" site plan by the Planning Director or designee.

Analysis – Electric Facilities Plan and the Integrated Development Ordinance (IDO)

The primary goal of the Electric Facility Plan is to ensure that the City of Albuquerque and Bernalillo County have an electric transmission and generation system capable of delivering electric energy in the amount and locations needed currently and in the future.

As described, this proposed project meets the definition of an Insignificant Action that results in a limited change and the Electric Facility Plan remains essentially the same. The new security wall and associate landscape will provide necessary protection for the electric transmission system to help secure the delivery of electric energy in the amount and locations needed currently and in the future.

The Electric Facility Plan’s design standards are contained in Section III. Standards for the Location and Design of Transmission and Substation Facilities. Subsection A. Location Standards is not applicable because the West Mesa Switching Station has been in place as an “as-built” facility since 1968. Subsection B. Design Standards include applicable items 14 (profile and size) and 15 (walls and landscape):

III. B. 14. Station profile and size should be as unimposing as possible.

The West Mesa Switching Station is an existing, very large 41.4-acre facility that was built in 1968, prior to any surrounding development. This existing facility is appropriately sized given the scope and scale of the service it provides to the metro area’s electric service transmission needs.

III.B. 15. All new and expanded substations will be standard PNM design, surrounded by a 12-foot wall and landscaped as approved through the site development plan approval process.

The West Mesa Switching Station is not new (it has been in place since 1968) and is not proposed to be expanded as part of the subject application to provide security walls and landscape. The proposed security wall is 14-feet in height, which has been determined to be necessary meet US Department of Homeland Security directives for critical infrastructure sectors and the Federal Energy Regulatory Commission (FERC) reliability requirements for planning and operating a bulk electric power system. The proposed landscape is appropriately located to provide maximum visual buffering for adjacent residential neighborhoods given the area’s topography and lines of sight.

Integrated Development Ordinance (IDO) Section 1-8(B): If any regulation in this IDO conflicts with other applicable laws or regulations of the City, or conflicts with applicable state or federal law, the more restrictive provision shall prevail, unless the provisions of state or federal law, as interpreted by the courts, prevent that result.

The applicable federal law and regulations are more restrictive than the standards of the Electric Facility Plan, which is a Rank II Facility Plan component of the Integrated Development Ordinance (IDO), so the more restrictive provisions of the federal law and regulations prevail. The proposed 14-foot high wall is appropriate given the scope and scale of the service the West Mesa Switching Station provides and the federal directives to

deter, detect, delay, defend, and respond to potential threats and to prevent and/or significantly mitigate the severity of damage that may be caused by physical attacks.

Analysis - Comprehensive Plan

Goal 12.1 Infrastructure: Plan, coordinate, and provide for efficient, equitable, and environmentally sound infrastructure to support existing communities and the Comp Plan's vision for future growth.

The requested Insignificant Action will secure the provision of electric infrastructure that is needed to support existing communities and the vision for future growth.

Policy 12.1.1 Infrastructure Design: Encourage design of visible infrastructure (surface and overhead) that respects the character of neighborhoods and communities and protects significant natural and cultural features.

The requested Insignificant Action will decrease the visibility of this important transmission facility from surrounding properties and residential neighborhoods that have developed after the West Mesa Switching Station was built in 1968. The security wall and the associated landscape will visually screen and buffer the electric equipment from public view.

Policy 12.1.6 Energy Systems: Coordinate with energy providers to safeguard essential infrastructure to serve existing development and ensure a safe, adequate, and reliable supply to support growth.

The requested Insignificant Action is per the standards and processes of the adopted Rank II Electric Facility Plan, which was established to coordinate with energy providers to safeguard essential infrastructure.

Goal 12.4 Coordination: Coordinate with other providers to leverage resources, maximize efficiencies, bridge service gaps, and provide added value.

The requested Insignificant Action is per the standards and processes of the adopted Rank II Electric Facility Plan, which was established to coordinate with energy providers to maximize efficiencies and provide added value.

Policy 12.4.1 Collaborative Strategies: Develop strategies to meet changing demand over time for public infrastructure, community facilities, and services.

The requested Insignificant Actions is per the standards and processes of the adopted Rank II Electric Facility Plan, which was established to develop and implement strategies to meet changing demand over time for public infrastructure, such as ensuring the security of critical infrastructure and key facilities like the West Mesa Switching Station.

Findings

1. This is a request for an Insignificant Action per the Rank II *Facility Plan: Electric System Transmission and Generation (2010-2020)* (aka “Electric Facilities Plan”). The action is an Administrative Amendment to an “as-built” site plan for the West Mesa Switching Station to provide new security walls and landscape.
2. Comprehensive Plan. This request furthers applicable goals and policies as follows:
 - a. Goal 12.1 Infrastructure: The requested Insignificant Action will secure the provision of electric infrastructure that is needed to support existing communities and the vision for future growth.
 - b. Policy 12.1.1 Infrastructure Design: The requested Insignificant Action will decrease the visibility of this important transmission facility from surrounding properties and residential neighborhoods that have developed after the West Mesa Switching Station was built in 1968. The security wall and the associated landscape will visually screen and buffer the electric equipment from public view.
 - c. Policy 12.1.6 Energy Systems: The requested Insignificant Action is per the standards and processes of the adopted Rank II Electric Facility Plan, which was established to coordinate with energy providers to safeguard essential infrastructure.
 - d. Goal 12.4 Coordination: The requested Insignificant Action is per the standards and processes of the adopted Rank II Electric Facility Plan, which was established to coordinate with energy providers to maximize efficiencies and provide added value.
 - e. Policy 12.4.1 Collaborative Strategies: The requested Insignificant Actions is per the standards and processes of the adopted Rank II Electric Facility Plan, which was established to develop and implement strategies to meet changing demand over time for public infrastructure, such as ensuring the security of critical infrastructure and key facilities like the West Mesa Switching Station.
3. Integrated Development Ordinance (IDO):
 - a. **Section 1-8(B)**: If any regulation in this IDO conflicts with other applicable laws or regulations of the City, or conflicts with applicable state or federal law, the more restrictive provision shall prevail, unless the provisions of state or federal law, as interpreted by the courts, prevent that result.
 - b. The applicable federal law and regulations (US Department of Homeland Security directives for critical infrastructure sectors and the Federal Energy Regulatory Commission (FERC) reliability requirements) are more restrictive than the standards of the Electric Facility Plan, which is a Rank II Facility Plan component of the Integrated Development Ordinance (IDO).
 - c. The proposed 14-foot high wall is appropriate for compliance with the federal law given the scope and scale of the service the West Mesa Switching Station provides.
4. Electric Facilities Plan:
 - a. This insignificant action supports the goal of the Plan to ensure delivery of electric energy.
 - b. This proposed project meets the definition of an Insignificant Action that results in a limited change and the Electric Facility Plan remains essentially the same.
 - c. Insignificant Actions are approved administratively by the Planning Director or designee.
 - d. This project meets the intent of Section III.B.14. because the West Mesa Switching Station is an existing facility that is appropriately sized given the scope and scale of the service it provides.
 - e. This project meets the intent of Section III.B.15. because the West Mesa Switching Station is not new nor proposed to be expanded; the 14-foot security wall has been determined to be necessary meet US

Department of Homeland Security directives for critical infrastructure sectors and the Federal Energy Regulatory Commission (FERC) reliability requirements; landscape is appropriately located to provide maximum visual buffering.

Decision

Pursuant to the authority granted to me by the adopted Rank II Electric Facilities Plan, I approve the subject Insignificant Action (Administrative Amendment to an “as-built” Site Plan) for the West Mesa Switching Station based upon the above Findings.

for Brennon Williams
Planning Director

28 August 2020
Date

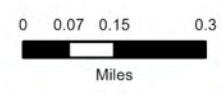
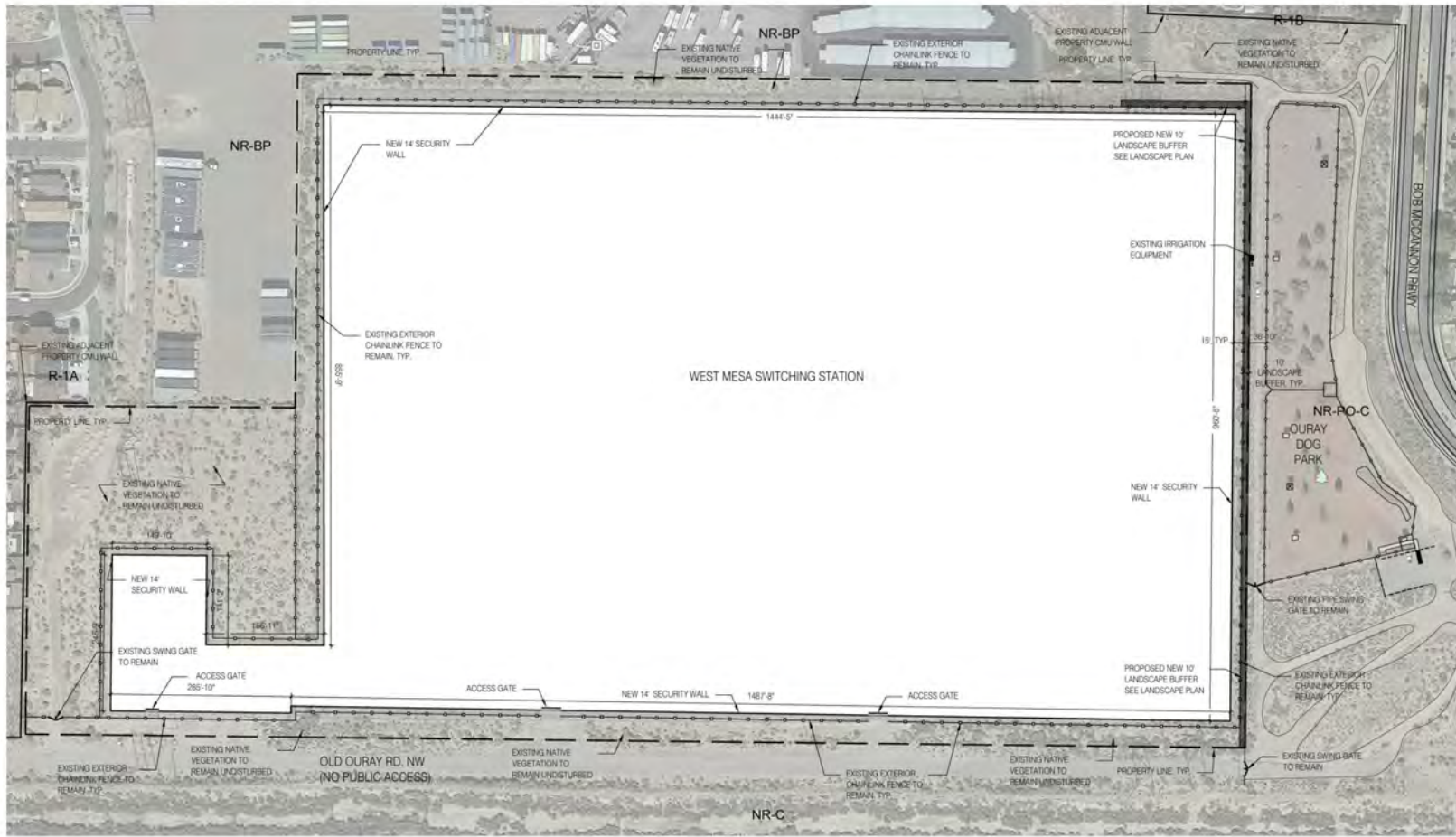


Figure 1

West Mesa Switching Station Security Wall Vicinity Map

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SITE INFORMATION
 SITE AREA: 41.4 ACRES
 CURRENT ZONING: NR-BP
 LAND USE: PNM ELECTRIC SWITCHING STATION

WEST MESA SWITCHING STATION

OWNER
 PNM

PROJECT TEAM
 CONSENSUS PLANNING
 PLANNING/LANDSCAPE ARCHITECTURE

SITE PLAN



Figure 2

West Mesa Switching Station Security Wall Site Plan

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Figure 3

West Mesa Switching Station Security Wall New Security Wall

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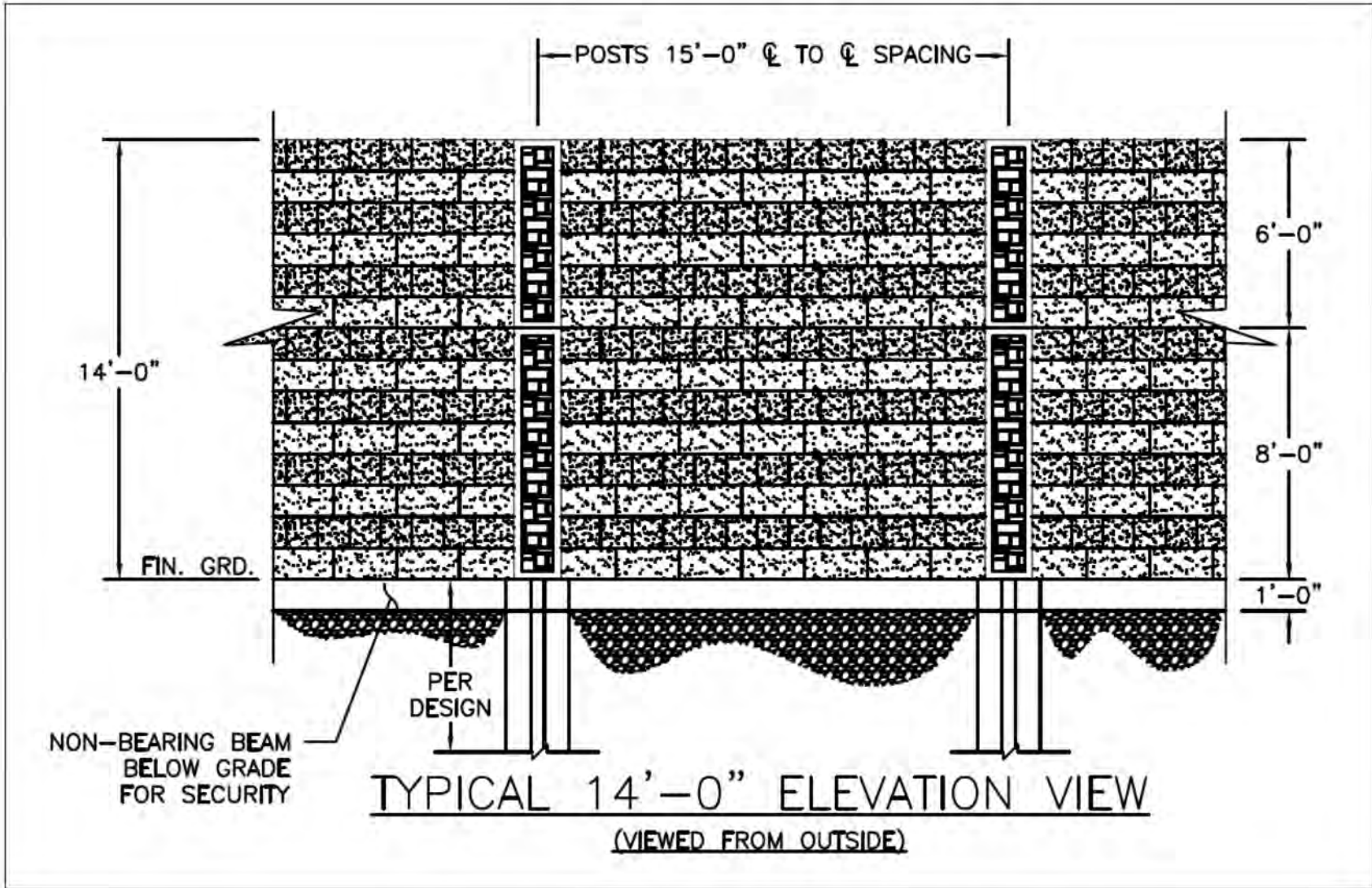


Figure 4

**West Mesa Switching Station Security Wall
Typical Elevation View**

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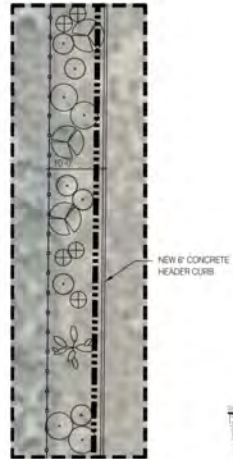


WEST MESA SWITCHING STATION

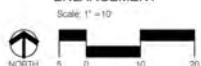
NR-PO-C

LANDSCAPE ENLARGEMENT
DETAIL AREA
NOTE:
SEE PLANT MASSING
ENLARGEMENT ON THIS
SHEET

OLD QUARY RD. NW
NO PUBLIC ACCESS



TYPICAL PLANT MASSING
ENLARGEMENT



PLANT LEGEND

QTY	SYMBOL	SCIENTIFIC NAME COMMON NAME	SIZE	INSTALLED SIZE MATURE SIZE	WATER USE
SHRUBS AND GROUNDCOVERS					
68	(Symbol)	ARTEMISA FILIFOLIA SAND SAGE	5-GAL	4 HT. X 4 SPR.	RW
16	(Symbol)	ATRIPLEX CANESCENS FOUR WING SALT BUSH	3-GAL	6 HT. X 8 SPR.	RW
44	(Symbol)	QUEROSTEMANUS NAUSEOSUS CHAMISA	3-GAL	5 HT. X 8 SPR.	RW
41	(Symbol)	FALLUGIA PARADOXA APACHE PLUME	5-GAL	5 HT. X 8 SPR.	LOW
90	(Symbol)	GUTIERREZIA SAROTHPAE SNAKE WEED	5-GAL	2 HT. X 3 SPR.	RW
33	(Symbol)	PSOROTHAMUS SCOPARIUS BROOM DALEA	15-GAL	3 HT. X 8 SPR.	RW
DESERT ACCENTS					
23	(Symbol)	OPUNTIA ENGLAMANNI ENGLAMANN PRICKLY PEAR	3-GAL	5 HT. X 8 SPR.	RW

MULCHES

(Symbol) SANTA FE BROWN CRUSHER FINES
(7\"/>

GENERAL LANDSCAPE NOTES

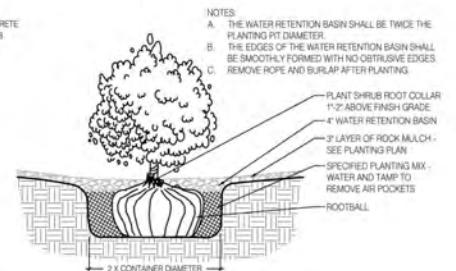
IRRIGATION
IRRIGATION SYSTEM STANDARDS OUTLINED IN THE WATER CONSERVATION LANDSCAPING AND WATER WASTE ORDINANCE SHALL BE STRICTLY ADHERED TO. A FULLY AUTOMATED IRRIGATION SYSTEM WILL BE USED TO IRRIGATE SHRUB AND GROUNDCOVER PLANTING AREAS. THE IRRIGATION SYSTEM SHALL BE DESIGNED TO ISOLATE PLANT MATERIAL ACCORDING TO SOLAR EXPOSURE AND WILL BE SET UP IN PLANT ZONES ACCORDING TO WATER REQUIREMENTS. SHRUBS SHALL BE PROVIDED WITH 25 GPM BUBBLERS, 1 PER SHRUB.

RESPONSIBILITY OF MAINTENANCE
MAINTENANCE OF ALL PLANTING AND IRRIGATION, INCLUDING THOSE WITHIN THE PUBLIC R.O.W., SHALL BE THE RESPONSIBILITY OF THE PROPERTY OWNER.

METHOD FOR COMPLYING WITH WATER CONSERVATION ORDINANCE
THE PLANT PALETTE IS PRECONSIDERABLY COMPOSED OF PLANTS WITH LOW TO MEDIUM WATER USE REQUIREMENTS, THEREBY MINIMIZING IRRIGATION NEEDS WHILE ENSURING THE ViABILITY OF THE PLANTS.

PMM COORDINATION
COORDINATION WITH PNM'S NEW SERVICE DELIVERY DEPARTMENT IS NECESSARY REGARDING PROPOSED PLANT MATERIAL'S LOCATION AND HEIGHT, SIGN LOCATION AND HEIGHT, AND LIGHTING HEIGHT IN ORDER TO ENSURE SUFFICIENT SAFETY CLEARANCES.

SCREENING WILL BE DESIGNED TO ALLOW FOR ACCESS TO ELECTRIC UTILITIES. IT IS NECESSARY TO PROVIDE ADEQUATE CLEARANCE OF TEN FEET IN FRONT AND AT LEAST 5 FEET ON THE REMAINING THREE SIDES SURROUNDING ALL GROUND MOUNTED EQUIPMENT FOR SAFE OPERATION, MAINTENANCE AND REPAIR PURPOSES.



SHRUB PLANTING DETAIL
SCALE: 1/2\"/>

WEST MESA SWITCHING STATION

OWNER
PNM

PROJECT TEAM
CONSENSUS PLANNING
PLANNING/LANDSCAPE ARCHITECTURE

LANDSCAPE PLAN

SHEET 2 OF 2
JULY 28, 2020

Figure 5

**West Mesa Switching Station Security Wall
Landscape Plan**

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