

July 9, 2025

Environmental Planning Commission  
City of Albuquerque  
600 2nd St NW  
Albuquerque, NM 87102

**RE: Cumulative Impact Analysis for Discount Towing project - 4000 2nd Street NW**

Dear Environmental Planning Commission Members,

Community Design Solutions, LLC (CDS), on behalf of J&M Discount Towing, LLC, respectfully submits this Cumulative Impact Analysis (CIA) in support of an EPC Site Plan application, in accordance with Section **14-16-5-2(E)(2)** of the Integrated Development Ordinance (IDO).

The subject site (see figure 1) is currently an operating towing and light vehicle repair facility located within the NR-LM (Non-Residential – Light Manufacturing) zone at 4000 2<sup>nd</sup> Street NW. The applicant proposes to construct a new 12,900 square foot shop building on the existing site to expand operations and improve service efficiency. The proposed development meets all the criteria of IDO section **14-16-5-2(E)(1)**, thereby triggering the need for a Cumulative Impact Analysis and an EPC site plan for the proposed development.

As outlined in the following CIA, the new shop building will not increase impacts to any surrounding residential areas. The project is being designed in a way that reduces existing operational impacts by enclosing activities, internalizing circulation, minimizing offsite lighting and noise, and screening outdoor storage—thereby improving compatibility with nearby residential uses while supporting the City's broader goals for economic reinvestment and infill development.



*Figure 1: Site location map*

## Cumulative Impacts Analysis

Per IDO 14-16-5-2(E)(2), the development shall do all the following:

**5-2(E)(2)(a)** Mitigate any material negative cumulative impacts on surrounding residential development through adequate and effective measures, including but not limited to all of the following:

1. Locating and designing vehicle access, circulation, parking, and loading to minimize impacts on residential uses within 660 feet in any direction of the subject property.

***Applicant response:*** *The existing use of the site as a towing and light vehicle repair facility will be significantly improved through the construction of a new 12,900-square-foot shop building that consolidates and encloses repair operations. This enclosure reduces visual clutter, operational noise, and other sensory impacts on surrounding residential properties, including those within 660 feet of the subject site.*

***Vehicle Access:***

*The proposed development maintains all existing curb cuts, avoiding the introduction of new driveways or changes to established traffic patterns. This preserves existing traffic flow on adjacent streets and avoids new impacts to nearby residential streets.*

***Circulation:***

*Circulation is fully internalized within a gated area and separated from public sidewalks, minimizing conflicts with pedestrians and residents.*

***Parking and Vehicle Storage:***

*All parking and vehicle storage areas are located internal to the site and screened by a combination of new buildings, existing perimeter fencing, and landscaping. Vehicle storage for repair work is in a gated area clearly delineated from customer parking, ensuring operational organization and reducing offsite visibility of stored vehicles.*

***Loading Areas:***

*Loading and service areas are located behind the primary building mass and away from adjacent residential uses. These activities are buffered by the new structure and oriented to limit visual and acoustic impacts.*

2. Locating, designing, and orienting site lighting to be compatible with residential uses within 660 feet in any direction of the subject property.

***Applicant Response:*** *All proposed exterior lighting will utilize 45 degree-shielded, cut-off fixtures directed downward to prevent light trespass onto adjacent properties, consistent with the requirements of the New Mexico Night Sky Protection Act, City of Albuquerque lighting standards, and ANSI/IES standards. Fixture placement is limited to areas necessary for site safety and security, such as building entrances and vehicle circulation areas.*

*Lighting levels are designed to be the minimum necessary for safe operation and do not exceed City allowances. These measures ensure that residential uses within 660 feet in any direction of the subject property are protected from glare and fugitive light. The overall*

*lighting plan is intended to enhance site functionality while maintaining compatibility with nearby residential development.*

3. Locating the storage of hazardous materials, as defined by federal regulation, to minimize impact on surrounding residential uses.

***Applicant Response:*** *The business qualifies as a Small Quantity Generator of hazardous waste under federal regulations and handles only limited quantities of hazardous materials, specifically automotive paints. All such materials are stored indoors in 5-gallon or smaller fire-rated containers, in full compliance with applicable EPA, OSHA, and NFPA regulations. Storage is located within the new shop building, away from property boundaries, and is not accessible to the public. These practices ensure that hazardous material storage poses no adverse impact to surrounding residential uses.*

4. Locating outdoor storage of materials or equipment to minimize impact on surrounding residential uses.

***Applicant Response:*** *The site will continue to include outdoor storage of vehicles associated with repair operations; however, the proposed development significantly reduces the visual and operational impact of such storage on nearby residential uses. The new 12,900-square-foot shop building provides expanded indoor workspace, allowing a greater number of vehicles to be serviced and stored inside rather than outdoors.*

*Outdoor vehicle storage areas are located toward the interior of the site, screened from view by existing and proposed fencing, new building massing, and landscaping. These site design elements minimize the visibility and impact of outdoor storage on residential uses within 660 feet.*

5. Locating activities on the site that generate noise to minimize impacts on residential uses within 660 feet in any direction of the subject property.

***Applicant Response:*** *The proposed development locates noise-generating activities—such as vehicle repair and equipment operation—inside the new 12,900-square-foot shop building, which significantly reduces noise transmission to adjacent properties. Enclosing these operations within a fully constructed building provides a substantial barrier to sound, especially compared to the existing condition where much of the activity occurs outdoors.*

**5-2(E)(2)(b)** Provide a cumulative impact analysis to the EPC that addresses, at a minimum, the items required in Subsection **14-16-6-4(H)**, which the EPC may use as the basis to require mitigation of identified impacts through conditions of approval.

**6-4(H)(1)(b)** The cumulative impacts analysis shall include all of the following:

1. A list of other uses listed in Subsection 14-16-5-2(E)(1)(c) that are within 660 feet in any direction of the subject property.



Figure 2: List of uses within 660ft of the subject property

2. A Traffic Impact Study, pursuant to Subsection 14-16-5-2(E)(2)(c).

**Applicant Response:** A traffic scoping form was prepared and submitted to the City Traffic Engineer. The City Traffic Engineer determined that a traffic study is not required. The completed scoping form has been included as a separate attachment with this application.

3. A list, estimated amount, and storage location of hazardous materials, as defined by federal regulation, to be used for operations, including but not limited to fuels.

**Applicant Response:** The business qualifies as a Small Quantity Generator of hazardous waste under federal regulations and handles only limited quantities of hazardous materials, specifically automotive paints. All such materials are stored indoors in 5-gallon or smaller fire-rated containers, in full compliance with applicable EPA, OSHA, and NFPA regulations. Storage is located within the new shop building, away from property boundaries, and is not accessible to the public. These practices ensure that hazardous material storage poses no adverse impact to surrounding residential uses.

3. A summary of sewer and storm water discharge, including volumes.

**Applicant Response:** An approved grading and drainage plan for the proposed site is included as part of the EPC Site Plan application. The approved grading and drainage plan complies with the most current Development Process Manual requirements for stormwater discharge and contains the proposed stormwater volumes. The new shop building will be connected to the existing sewer system, which is adequately sized for the predicted volume of wastewater discharge.



4. A Letter of Availability from the ABCWUA, including an estimate of volume of water to be used annually for operations.

***Applicant Response:*** ABCWUA Letter of Availability #230411 was issued for this proposed development. However, the proposed building will utilize the existing water and sewer service for the site. The new shop building contains 28 water supply fixture units (WSFU) as defined by the 2021 Uniform Plumbing Code (UPC). Per UPC chart A 103.1(2), this corresponds to a peak flow of 20 gpm. Assuming average water usage is 15% of peak flow and occurs 8 hours a day, 50 weeks a year, results in an annual water volume estimate of 504,000 gallons.

5. The operating hours of the facility, including but not limited to times when there may be delivery or movement of freight vehicles to and from the property and activities that generate noise and occur outdoors.

***Applicant Response:*** The hours of operation are from 8am-5pm. All noise generating activities associated with business will occur indoors within the existing and proposed shop buildings.

6. A list of and copies of all permits required for the use.

***Applicant Response:*** This information will be provided in a separate submittal.

#### **6-4(H)(2) Traffic Impact Study**

***Applicant Response:*** A traffic scoping form was prepared and submitted to the City Traffic Engineer. The City Traffic Engineer determined that a traffic study is not required. The completed scoping form has been included as a separate attachment with this application.

#### **6-4(H)(3) Outdoor and Site Lighting Performance Analysis**

***Applicant Response:*** All proposed exterior lighting will utilize 45 degree-shielded, cut-off fixtures directed downward to prevent light trespass onto adjacent properties, consistent with the requirements of the New Mexico Night Sky Protection Act, City of Albuquerque lighting standards, and ANSI/IES standards. Fixture placement is limited to areas necessary for site safety and security, such as building entrances and vehicle circulation areas.

*Lighting levels are designed to be the minimum necessary for safe operation and do not exceed City allowances. These measures ensure that residential uses within 660 feet in any direction of the subject property are protected from glare and fugitive light. The overall lighting plan is intended to enhance site functionality while maintaining compatibility with nearby residential development.*

**5-2(E)(2)(c)** Provide a traffic impact study pursuant to Article 7-5(D) of the DPM, notwithstanding the thresholds or mitigation requirements in the DPM, which the EPC may use as the basis to require mitigation of the traffic generated by the use through conditions of approval.

***Applicant Response:*** A traffic scoping form was prepared and submitted to the City Traffic Engineer. The City Traffic Engineer determined that a traffic study is not required.

*The completed scoping form has been included as a separate attachment with this application.*

**5-2(E)(2)(d)** Be reviewed by the Environmental Planning Commission (EPC), pursuant to Subsection 14-16-6-6(I).

***Applicant Response:*** *This CIA is being prepared as part of an EPC Site Plan Application being submitted pursuant to 5-2(E)(2)(d) and 14-16-6-6(I).*

**5-2(E)(2)(e)** Have an approved Site Plan – EPC that meets conditions of approval deemed necessary by the EPC to further compliance with the above standards to minimize impact on the surrounding residential uses and maximize compatibility of the proposed development prior to the submittal of any request for platting on the property.

***Applicant Response:*** *This CIA is being prepared as part of an EPC Site Plan Application being submitted pursuant to 5-2(E)(2)(e).*

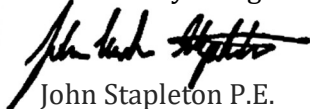
## Conclusion

The proposed development has been thoughtfully designed to mitigate material cumulative impacts on surrounding residential uses within 660 feet of the subject property. Through the construction of a new 12,900-square-foot enclosed shop building, the site reduces visual, noise, and operational impacts compared to existing conditions. Vehicle access and circulation patterns are maintained and internalized, site lighting is 45-degree shielded and downward-facing, and outdoor storage and noise-generating activities are strategically located and screened to minimize off-site effects. These measures—taken collectively—demonstrate compliance with the intent and specific requirements of IDO Section 14-16-5-2(E)(2) and promote compatibility with nearby residential development.

In addition to compatibility with nearby residential development, the project supports the City's economic development goals by reinvesting in an existing commercial property and expanding operational capacity for a locally owned business. This type of reinvestment aligns with Comprehensive Plan Goal 8.1 (Economic Development), which encourages infill and redevelopment that strengthens the local economy, creates jobs, and supports business retention. The project balances economic activity with appropriate mitigation measures, meeting the intent of IDO Section 14-16-5-2(E)(2) while contributing to the vitality and sustainability of the surrounding community.

Sincerely,

Community Design Solutions, LLC



John Stapleton P.E.

**CDS** | Project Manager  
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