

February 14, 2021

Dear City Planning, EPC, and City Councilors,

There must be a better process to do the Annual IDO Update. Proposing 101 City wide Amendments, and 14 small area Amendments is much too much to review, understand, and comment on all at once. Most of these amendments are substantive and need more evaluation, and research to look at best practices to develop good planning regulations. Doing this all at once makes it impossible to do that

The few Zoom meetings held for the public before and after the Holidays could not cover all the amendments. It is impossible to go over all 101 + 14 amendments, at these meetings. We did our best to try and understand them. Now it appears there is a rush to approve the amendments. This is an overwhelming process to go over this many amendments at once without adequate time for review, evaluation and understanding to ensure we get the best possible zoning for the city. It is difficult for all involved including the Neighborhoods, the staff planners, the EPC and the Councilors.. This is not a good way to Plan a city and get good results. There must be a better way to do this. We don't want to approve things that we may later regret.

In the meantime, in preparation of the EPC Feb. 18th Hearing, I am providing comments on a few amendments that could be supported, those that need more work, and those that should not be approved at this time.

Thank you,  
Rene' Horvath  
Land Use Director for WSCONA and TRNA

**City wide IDO Amendments to support: comments are in red:**

**1. This is the first IDO Amendments on Pg. #1 of city wide amendments:**

**1) Protect Natural Resources/Councilor Bassan/IDO pg.1,section 1-3:** Adds a purpose statement to reinforce protection of the Natural resources: River, waterways, OS, Sensitive lands. Protect the abundant natural resources that characterize Albuquerque including but not limited to major public open space, sensitive lands, the Rio Grande, and the waterways that lead to the river.

This is a good purpose statement that strengthens the intent of protecting our natural resources, which has always been the goal for Albuquerque. This can be done through applying good design technique, adequate buffer protection, and having good zoning rules that are well thought out.

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**2. Three IDO Amendments related to Multi-family : There is widespread public support for amendments to improve Multifamily developments**

**1. Dwelling Multifamily development/Landscape standards/DRB /IDO pg.154,**

**4-3(B)(7)(a):** Revise to include these standards except for areas in UC-MS-PT: 25% of net lot area shall contain landscaping, with 75% being tree canopy and plants. Turf areas are restricted to 20% of area, drought tolerant turf may cover an additional 70%. **Seeing more vegetation in landscapes for multi-family developments, will make the City look more attractive, and help to reduce heat islands. This amendment includes drought tolerant plants which we also appreciate. Thank you!**

**2) Dwelling Multifamily/usable open space/DRB /IDO pg.154, 4-3(B)(7)(b):** No more than 30% required open space can be private or occur on upper stories, unless within 660 ft. of NR-PO or MPOS. See Memo.

**4-3(B)(7)(b) Except in DT-UC-PT-MS areas, no more than 40 percent of required usable open space can be private to a household or occur on or under upper stories of the project buildings unless the site is located no more than 660 feet in any direction of an NR-PO zone district or Major Public Open Space.**

**Usable open space is important for all apartments, I would recommend it for all apartments in the city, regardless if it is near Open Space or not. It adds to the quality of life for the residents living there, and makes a good impression to the community.**

**3) 5-2(D) SITE DESIGN TO RESPOND TO CLIMATE AND GEOGRAPHIC FEATURES: Support!**

All multi-family residential development containing more than 25 dwelling units and all non-residential development, **except industrial development**, shall comply with all of the standards in this Subsection 14-16-5-2(D).

**5-2(D)(1) Climatic Responsiveness**

The site design process shall include a sun and shade analysis of daily and seasonal position of the sun. The site analysis shall be included with applications for Site Plan.

5-2(D)(1)(a) Building **layout** and window **placement shall be evaluated** to reduce summer heat and glare and to capture winter sun.

5-2(D)(1)(b) Living landscape elements shall **be evaluated for placement** in the most beneficial microclimates and/or to provide the best cooling conditions to mitigate heat gain.

**5-2(D)(2) Geographic Responsiveness**

5-2(D)(2)(a) The site design process shall include an analysis of the ability to capture views of prominent geographic features. The site analysis shall be included with applications for Site Plan.

5-2(D)(2)(b) The placement and orientation of buildings, windows, balconies, and patios shall **be evaluated to** capture available views of prominent geographical features, such as the Sandia mountains, the Bosque/Rio Grande, the Volcanoes/Northwest Escarpment.

Note: This entire section is a new proposed addition to the IDO. The text shown in red and underlined has been revised from the original EPC submittal dated November 30, 2020.

Building layout is so beneficial in terms of energy conservation, view protection and providing a quality of life for the residents and community. There is always widespread support for a well thought out plan. Thank you!

#### **4) 5-11(D) MULTI-FAMILY RESIDENTIAL DEVELOPMENT**

##### **5-11(D)(1) Building Entrances**

Primary pedestrian entrances to each primary building shall be emphasized and provide weather protection through variations in the façade, porticos, roof variations, recesses or projections, or other integral building forms.

##### **5-11(D)(2) Façade Design**

Façades shall be designed to provide a sense of human scale. Building facades shall meet all of the following requirements or provide justification that the intent of this section is achieved by an alternative design approach.....

##### **5-11(D)(2)(b) Articulation**

Facades shall change in massing and form as specified below to visually break up the building. Each front and side façade shall meet all of the following requirements or provide justification that the intent of this section is achieved by an alternative design approach

##### **5-11(D)(3) Roof Design**

Rooflines longer than 60 feet shall include at least one vertical or horizontal elevation change of at least 2 feet. Roofs with a pitch of less than 2:12 shall be screened by a parapet wall.

##### **5-11(D)(4) Garages and Carports**

5-11(D)(4)(a) Garages and carports shall not be located between any streetfacing façade of any primary multi-family dwelling and an abutting street, but shall instead be internalized within building groups so as not to be directly visible from the street frontage.

5-11(D)(4)(b) Where the ground floor of the project is 75 percent or more of parking, vehicular ingress/egress to a parking garage at ground level shall include a planter.

Note: The text shown in black and underline shows proposed revisions to the IDO. The text shown in red and underlined/strike-through has been revised from the original EPC submittal dated November 30, 2020..

**Staff Analysis:** *If approved, the amendment would further the Regulatory Alignment Policy (5.7.2), Community Character Policy (7.3.2.e), Development Quality (7.3.5), Compatibility Policy (9.2.1), High Quality Policy (9.2.2), and Development Cost Policy (9.6.1). The proposed changes would have a minor impact on the way multi-family housing is designed and developed as most current projects comply with these standards. The standards balances quality, affordability, and livability. The proposed changes have also involved a public engagement effort with several local architects and developers/owners of both market rate and affordable multi-family housing in order to ensure that the amendment is feasible to implement. The proposed changes amend the building design standards and use-specific standards regarding landscaping and usable open space for multi-family buildings. They also take into consideration the value of a multifamily project being an aesthetic complement to the surrounding area and neighborhood. The new standards*

*are narrowly tailored, context-sensitive, and only apply to multi-family developments outside of the UC-MS-PT areas.*

We appreciate the City working with architects to come up with good design standards to ensure a high quality attractive, energy efficient design for apartments, as well as making them affordable. Thank you!!

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### **3. There are 2 Amendments for Riparian Areas: Support!**

#### **1) Sensitive lands Riparian Areas (new definition)/OSAB /IDO pg.551,section 7-1:**

Add a new definition with text as follows:"Aquatic ecosystems and the transitional ecosystems surrounding them, as shown on the map maintained by the City Parks and Recreation Department. The transitional riparian ecosystem is characterized by distinctive vegetative communities and soils that are affected by the presence of surface and groundwater, and provides critical habitat, including for endangered species and migratory birds."

Adds a definition for a proposed type of sensitive land to avoid. See related item to add riparian areas to the list of sensitive lands in 5-2(C)(1). See additional explanation in the Council Services memo related to requests by Open Space Advisory Board and Open Space Staff. **Support!**

#### **2) Add Additional Buffer near Sensitive lands/OSAB/IDO Pg. 229, section 5-2(J)(2)(b): See Below**

Not be located within 50 ft. of steep slopes, escarpments, wetlands, riparian areas in MPOS, excluding single loaded streets and landscape buffer requirements in **section 5-2**

**(J)(2)(a)(1)/: See Memo** below from Council services & OSAB.

We support with added comments: Buffer protection is critical for these areas. The larger the buffer, the better the protection. A large buffer and a single loaded street has been a very beneficial edge treatment thereby providing the community wonderful views of the city and open space, and protects residents from soil erosion and storm water flooding. Large Buffers, along with single loaded streets, have provided the greatest protection for developed areas near the Petroglyph escarpment. Please Note: The Coors Corridor Sector Plan required a minimum of 100 ft. for buffer protection, along the west side of the Bosque. Developments on the west side of the river have complied with this requirement. We recommend increasing the buffer protection for riparian areas to a minimum of 100 ft.

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### **Citywide IDO amendments - Don't support or needs more work:**

#### **1. Drive Thru's/ Changes from CA (Conditional Accessory) to A (Accessory use) in MXL/Jones and Pena/IDO pg.147, Table 4-2-1:** During the COVID-19 pandemic the use of drive-throughs and drive-ups have been essential to certain businesses is the reason given by the Councilors.

MX-L zones was previously zoned C-1 Neighborhood Commercial under the former Zoning Code. In C-1 zones, drive-throughs were permissive for lower-impact uses (banks, loaning money, or pawn shops) but were conditional for uses that have greater impact on nearby neighborhoods (retail and restaurants). Due to the greater impact on neighborhoods, the conditional use requirement was put in place for restaurant and retail drive-throughs to provide the opportunity for the public to participate in the process and provide input.

*Staff suggests considering non-permanent mechanisms through which drive-throughs can be facilitated as a response to the pandemic only, such as issuing special permits with a sunset date, rather than change the IDO wholesale. Perhaps this change could be included in a special “pandemic response” bill. The Planning staff explanation is good. The current IDO regulations for Drive thru's are appropriate, in maintaining "conditional accessory use" for drive thru's in MXL zones, just as it was for C-1 zones. Many sites can be ruined if high traffic generating uses, such as drive thru's are not properly located. We also support the staff planners analysis and recommendation for adding a temporary emergency use.*

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**2.Cottage Development.** There are 3 Council amendments being proposed, plus a recent 4th amendment that has been proposed. See below:

**1). Dwelling Cottage Development/Pena/IDO pg.151,4-3(B)(3)(b):** Revise minimum project size for cottage development is 10,000sf. *What is a cottage development ? Is it a Family Compound, Tiny homes, an additional dwelling unit for a mothers quarters, or a subdivision of cottages? A 10,000 sf. lot is very small and usually only has one home on it. There needs to be more explanation as to what the vision is for this amendment regarding cottage development, and allow more time for the public to understand and provide input to ensure a quality product.*

**2). Dwelling Cottage Development/Borrego/IDOp.151. 4-3(B)(3)(b):Add new subsection 14-16-6-6(A):** This use shall require a conditional use if outside of UC-MS-PT, at least 10,000sf, no larger than 1 acre. This is one of 3 changes to cottage development.

**3).Dwelling Cottage Development/Borrego/IDOp.151, 4-3(B)(3)(b)2:** Allows cottage development on smaller lots (10,000sf) in all Centers and corridors UC-MS-PT-[AC-DT-EC] within 1,320 ft. 1/4 mile of this areas.

**This is the latest proposal:**

**4) • Row 9. Cottage Development**

• “This use shall require a Conditional Use Approval pursuant to Subsection14-16-6-6(A) if **located in an Area of Change** on a lot outside of a UC-MS-PT area that is at least 10,000 square feet but no larger than 1 acre.” *Note Coors Blvd. is an Area of Change, as well as Paseo del*

Norte on the Mesa top, and many other properties in Albuquerque, affecting the following zones for cottage development: (R-A,R-1,R-MC, R-ML,R-T,MX-T).

This seems more like a zone change that needs more analysis. This is turning a single family lot to more of a multi-family lot, allowing more density without any protection or design criteria, or public input. Most of Albuquerque does not know anything about cottage development, to provide input.

Cottage development sounds like a great concept if done well. We have learned many times what sounds good is not good. We would like to know more about cottage development, what it looks like. We have concerns about the proposed amendments making the lot sizes too small, going from 1 acre (43,560 sq. ft.) to 10,000sf. Albuquerque may end up with undesirable results that cannot be changed later. Most standard lots in Albuquerque are 10,000sf for one home. Squeezing 3 homes onto 10,000sf lot, with only 1 parking space per home, with a total 2 visitor parking spaces, seems too crowded and undesirable, with very little useable Open space left. (We would recommend 3 small homes (1000 sf each) on an half acre site with 2 parking spaces per home and 4 spaces for guests, with a nice amount left for common usable open space. But this still needs more discussion.) Therefore we recommend, keeping the existing IDO language until more understanding and thoughtful analysis of what we want to see in cottage development, to ensure a quality product. There are other requirements that should be considered but are completely absent from this ordinance.

Therefore the Cottage amendments should not be approved at this time. Thank you!

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### 3. Common Open Space for cluster development:

#### 1) Common Open space Definition/Borrogo and Sena/IDO pg.541, section 7-1:

Open Space Definitions: Common Open Space: Revise the first sentence as follows:"The area of undeveloped land and/or existing site features within a cluster development that is set aside for the preservation, use and enjoyment by the owners and occupants of the dwellings in the development and includes **historic buildings or structures, sensitive lands, hazard-prone areas, agriculture, landscaping, on-site ponding, or outdoor recreation uses.**" Removes Onsite Ponding. Adds preservation of existing features, historic buildings, sensitive lands and hazard prone areas. **See Council Service memo:** On-site ponding areas often have an AMAFCA or City of Albuquerque easement associated with them and may not always be preserved in a form that can be enjoyed by the residents of a cluster development.

***Remove "Sensitive lands and hazard-prone areas" from the common open space definition. The list of Sensitive lands include many hazard prone areas. Hazard zones in the list should not be considered Common open space for the enjoyment of the residents. Also note: many times, Sensitive lands need a protective buffer around them to protect them and the residents from natural hazards and to protect the natural resources. Common open space can be that buffer protection adjacent to sensitive lands. Common open space should not include hazard prone areas found in the sensitive land list.***

***More explanation:*** In the 2018 and 2020 IDO, common open space did not include sensitive lands nor hazard prone zones in the common open space definition.

***The reason we suggested removing on-site ponding, was because hazard zones, such as arroyos and detention ponds, were being misinterpreted as on-site ponding. The proposed***

*amendment removes on-site ponding which is good, to avoid this confusion. But the amendment now mentions sensitive lands and hazard prone areas, which should not be included in the 30% Common Open Space calculation for Cluster development. Sensitive lands include hazard prone areas such as: arroyos, wetlands, which are floodways, or flood fringe areas. Sensitive lands also includes steep slopes & escarpments that have drainage and erosion issues which are hazard prone as well, and large stands of mature trees in the Bosque are fire prone. The west side residents have experienced these hazards over the years. Hazard prone lands are not suitable for development, and it is not a fair exchange to use hazard prone areas for common open space in exchange for smaller lots. Please note: Cluster development requires 30 % Common open space in exchange for doing small lots. the common open space should be used as buffers adjacent to hazard prone or sensitive areas to protect the residents from these hazards. Again.... both sensitive lands and hazard prone areas should be removed from this proposed amendment. The benefits of cluster and common open space is that they can solve a lot of problems for developments adjacent to wildlife preserves and hazard prone/sensitive areas by providing the buffer protection; and be an open space amenity that the residents can enjoy.*

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#### **4. Additional comments for IDO Amendments:**

##### **1) Group Home<sup>805</sup>**

Any building, structure, home, facility, or place in which persons reside for a period of more than 24 hours designed to help the residents adjust to the community and society and that is intended to be used for the purposes of letting rooms, providing meals, and/or providing personal assistance, personal services, personal care, and protective care to persons that do not meet the definition of a handicapped person or another person protected against housing discrimination under the federal Fair Housing Act Amendments of 1988 (as amended) and court decisions interpreting that Act, but not skilled nursing care. This use shall include halfway houses for individuals in the criminal justice system or residential facilities to divert persons from the criminal justice system.

**Need to make sure there is enough distance separation between the drug treatment centers and half way house used for individuals coming from the criminal justice system and the residential neighborhoods to avoid conflicts. Also recommend to continue to track these places to help maintain a well run facility. Thank you!**

##### **2). Angle Plane/IDO pg. 317, 5-10(C)(1):** Revise to read as follows:

"The building height shall not exceed the relevant heights shown in Table 5-10-1 or the maximum building height allowed by the zone district, whichever is less. The building heights in the table were determined based... angle plane of 32 degrees angle that allows 1 hour of Winter Solstice. ... a complementary tool to ensure adequate solar access.

Simplifies the regulation to track with the table versus requiring geometry for each application based on the angle plan. Resolves the conflict between the angle plane and the Table. The result also generally tracks

better with established setback requirements, which are a complementary tool to ensure adequate solar access.

The table maximum building Ht. #'s that was approved in 2020 is inaccurate and needs to be corrected.

We support protecting our Solar Access, especially for residents, adjacent to tall buildings. This year we have a lot of people upset because now they are now losing solar access to their homes as a result to the IDO changes which is now allowing 3-4 story buildings behind their homes. The idea for Angle Planes is to protect solar access. Please note: The May 2018 IDO chart was correct. The new IDO 2020 Amended chart for Solar Access is incorrect. The new chart needs to be corrected before this amendment can be approved. We should go back to the 2018 chart #'s and then add to it for the R-ML zone. Specifically, the See at the bottom of the pages for the two charts.

**SOLAR ACCESS ADDENDUM: Additional comments: The maximum building Ht's. were revised upwards. The Ht's. are suppose to be OK for the whole range on each line of the table from the northern lot line. Unfortunately the "Maximum Building Ht." in the 2020 revision are typically only good for the most furthest distance away from the northern lot line. They fail on the lower distance in the range. In the 2018 chart, the building heights shown kept the shadow on the building to a maximum of 2 ft. In the 2020 chart the shadow on the building is greater than 2 ft. and blocks solar gain on the building walls and windows. Please compare the two charts below.**

**The chart below is the new 2020 chart and the numbers for the maximum building heights are incorrect.**

#### **5-10(A) PURPOSE**

This Section 14-16-5-10 is intended to allow for development while ensuring continued access to solar energy.

#### **5-10(B) APPLICABILITY**

The standards in this Section 14-16-5-10 apply to development in any zone district unless specified otherwise in this IDO.<sup>490</sup>

#### **5-10(C) BUILDING HEIGHT**

All development in the R-A, R-1, R-MC, R-T, and R-ML zone districts shall comply with the standards in this Subsection 14-16-5-10(C).<sup>491</sup>

5-10(C)(1) The building height shall not exceed the following heights, determined by the distance cardinally south from the northern property line as shown in Table 5-10-1, or angle plane equivalent, or the maximum building height allowed by the zone district, whichever is less. Distances in Table 5-10-1 have been calibrated to a 32 degree angle that allows 1 hour of Winter Solstice sunlight that hits at least 2 feet up on a southern-facing wall located 10 feet from the property line. Distances from the northern property line that are not whole numbers are rounded down.<sup>492</sup>



Distance from Northern Lot Line, ft. Maximum Building Height, ft. for new 2020 chart is incorrect:

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Distance from Northern Lot Line, ft.	Maximum Building Height, ft.
0-5	11
6-10	14
11-15	17
16-20	20
21-25	23
26-30	27
31-35	30
36-40	33
41-45	36

- 5-10(C)(2) The ZEO shall waive or adjust the provisions of Subsection (1) above if the ZEO finds that beneficial solar access can be protected for a lot to the north without compliance with the provisions of Subsection (1) because:<sup>494</sup>
- 5-10(C)(2)(a) The lot(s) to the north are large enough or higher in elevation than the lot to the south, so that there are many good locations for passive or active solar collector that would not be blocked by proposed construction that does not comply with the height restrictions of Subsection (1) above.
- 5-10(C)(2)(b) The development on the lot(s) to the north is already served by as much solar collector area as is likely to ever be needed for that lot,

<sup>493</sup> Revised per EPC Condition #1 (Tech Edits).

<sup>494</sup> added per EPC Condition #1 (Tech Edits). Revised per City Council Amendment B15.

<sup>495</sup> Revised per EPC Condition #1 (Tech Edits). Revised editorially for consistency with City Council Amendment B15.

<sup>496</sup> Revised per City Council Amendment B15.

<sup>497</sup> Revisions throughout this section per City Council Amendment B15.

The ZEO shall waive or adjust the provisions of Subsection (1) above if the ZEO finds that beneficial solar access can be protected for a lot to the north without compliance with the provisions of Subsection (1) because:<sup>494</sup>

5-10(C)(2)(a) The lot(s) to the north are large enough or higher in elevation than the lot to the south, so that there are many good locations for passive or active solar collector that would not be blocked by proposed construction that does not comply with the height restrictions of Subsection (1) above.

5-10(C)(2)(b) The development on the lot(s) to the north is already served by as much solar collector area as is likely to ever be needed for that lot,

**Below is the May 2018 chart for Solar Access. The numbers in this chart for the 32 degree angle plane are correct. Please use this chart and add to it for RML zone.**

### 5-10(A) PURPOSE

The standards in this Section 14-16-5-10 are intended to allow for development while ensuring continued access to solar energy.

### 5-10(B) APPLICABILITY

The standards in this Section 14-16-5-10 apply to development in the R-A, R-1, R-MC, and R-T zone districts.

### 5-10(C) BUILDING HEIGHT

5-10(C)(1) The building height shall not exceed the following heights, determined by the distance cardinally south from the northern boundary of the lot as shown in **Table 5-10-1, or angle plane equivalent.** Distances in Table 5-10-1 have been

calibrated to a 32 degree angle that allows 1 hour of Winter Solstice sunlight that hits at least 2 feet up on a southern-facing wall located 10 feet from the property line. Distances from the northern property line that are not whole numbers are rounded down.

Part 14-16-5: Development Standards		5-10(D): Permits for Solar Rights
5-10: Solar Access		5-9(F)(2): Truck Loading Areas
<b>Table 5-10-1: Solar Rights Maximum Building Heights</b>		
Distance from Northern Lot Line, ft.	Maximum Building Height, ft.	
0-5	10	
6-10	11	
11-15	14	
16-20	17	
21-25	20	
26-30	23	
31-35	25	
36 or more	26	

5-10(C)(2) The Zoning Enforcement Officer (ZEO) shall waive or adjust the provisions of Subsection (1) above if the ZEO finds that beneficial solar access can be protected for a lot to the north without compliance with the provisions of Subsection (1) because:

5-10(C)(2)(a) The lot(s) to the north are large enough or higher in elevation than the lot to the south, so that there are many good locations for passive or active solar collector that would not be blocked by proposed construction that does not comply with the height restrictions of Subsection (1) above.

5-10(C)(2)(b) The development on the lot(s) to the north is already served by as

**IDO Amendments for Small Area plans: Needed more time to organize my comments for the small area amendments, which are also very important. Here are a few I was able to get to.**

**1) Northwest Mesa Escarpment – View Protection Overlay (VPO-2)**

**Actions:**

1. Create a new Height Sub-area 2 within VPO-2 that is within 660 feet of the existing Height Sub-area. This area shall not include the Volcano Heights Urban Center. The existing VPO-2 Height Sub-area shall be referenced as VPO-2 Height Restrictions Sub-area 1.
2. Revise the VPO-2 boundary to include any areas where the proposed VPO-2 Height Restrictions Sub-area 2 is outside of the existing VPO-2 boundaries.
3. Revise Subsection 3-4(N)(4) Volcano Mesa – CPO-13 to read as follows: “Standards in this Subsection 14-16-3-4(N)(4) apply only outside of the subareas indicated in Subsection 14-16-3-6(E)(2) as the Northwest Mesa VPO-2 Height Restrictions Sub-area 1 and Sub-area 2.
4. Move existing content in 3-6(E)(3) to a new subsection (a) with heading VPO-2

Subarea 1 and create a new subsection (b) VPO-2 Subarea 2 as follows:  
Structure height shall not exceed 30 feet, as measured from natural grade, or the maximum height of the underlying zone district, whichever is lower.

We support the maximum building Ht. height limitation of 30 ft. The mesa top is a unique feature of Albuquerque where Planning documents have always treated this area more special with the intent to do more to blend with the natural environment. To accomplish this, the building height needs to be limited to a more appropriate height, using earth tone colors also helps to blend development better with the natural environment. This helps preserve the quality for this area. Keeping the building heights low will allow development on the mesa to blend with the natural surroundings much better, and will help protect the views looking from the east side of Albuquerque to the Volcanoes, which is a valued asset for Albuquerque. We also support the small area amendments to use more compatible uses and restrict the more intensive uses near the escarpment, such as carwashes, light refueling stations, etc. Thank you!

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## 2) Coors Boulevard – View Protection Overlay (VPO-1)

- **Topic:** Major Transit Parking reduction exemption
- **IDO Page #:** 123
- **IDO Section:** 3-6(D)
- **Change/ Discussion:** Create a new section as follows:

### 3-6(D)(9) Parking Reductions

(a) Parking reductions associated with proximity to Major Transit are not applicable in the Coors Boulevard VPO-1.

- **Explanation:** With the adoption of the 2019 IDO Annual Update a 20% reduction in parking in proximity to Major Transit was applied. Coors Boulevard is a Major Transit Corridor. This revision would exempt Coors Boulevard VPO-1 from the reduction in parking. Reduced parking can result in more dense development patterns that could be contrary to the intentions of the Coors Boulevard VPO.

We support Councilor Sena's amendment to remove parking reductions along Coors Blvd. We recommend that the amendment also includes all of Coors blvd. not just the VPO section. Albuquerque does not have a strong transit system though out Albuquerque to rely on to justify removing parking spaces. We need those parking spaces along Coors blvd. Also note: that many people who do use the bus to get downtown, or UNM, from the west side use these parking spaces along Coors blvd. to park their cars in order to catch the bus. Need to make riding the bus more easy, not more difficult. Please remove the "parking reduction" requirement from Coors Blvd.