

From: [Jane Baechle](#)
To: [City of Albuquerque Planning Department](#)
Subject: Comments re: ZMA
Date: Monday, January 15, 2024 10:54:40 AM
Attachments: [48 hr ZMA Gold.pdf](#)

[EXTERNAL] Forward to phishing@cabq.gov and delete if an email causes any concern.

Please find attached comments submitted under the 48 hour rule ahead of the EPC meeting of 1/18/2024.

I hope you all enjoy a lovely holiday and look forward to confirmation you have received our comments.

Jane Baechle
Resident of ABQ

Jane Baechle
7021 Lamar Avenue NW
Albuquerque, NM 87120
Jane.Baechle@gmail.com

Date: January 15, 2024

To: David Shaffer
Chair, EPC

From: Jane Baechle
Resident of ABQ

Re: Gold Avenue ZMA

Please accept the following comments opposing the requested zoning map amendment for 1701 Gold Avenue SE, item 3 on your agenda for the EPC meeting of 1/18/2024. As I indicated, I am writing as an individual. That does not, however, mean that your analysis of this request and decision are without consequence and implications for other neighborhoods.

If granted, this zone change would allow the development of a structure 65' in height, far out of scale and character with a walkable, welcoming neighborhood, homes and businesses. It would loom over more modest multi-family and single family homes adjacent to this property or mere blocks away. The existence of taller structures in the larger area, around Presbyterian Hospital or on the UNM campus, which also has abundant open areas and green space that encourages walking, meeting and spending time with the campus community, does not mitigate the harm that a much taller structure would have on the nearby homes and residents.

This is not knee jerk opposition to higher density housing. Higher density housing, however, should not intrude on the surrounding area and impose on an established and modest neighborhood for the sake of simply adding density.

IDO purpose statement 1-3(E) is clear, "Protect the quality and character of residential neighborhoods." Creating a spot zone of high density housing in the midst of lower density housing and modest homes is entirely inconsistent with that purpose statement.

I respectfully request you deny this zoning map amendment.

Sincerely,
Jane Baechle

From: emailbrowns@aol.com
To: [City of Albuquerque Planning Department](#)
Subject: Letter from SPNA EPC Jan 18
Date: Tuesday, January 16, 2024 8:36:40 AM
Attachments: [SPNA letter in opposition to spot zone change at 1701 Gold final.pdf](#)

[EXTERNAL] Forward to phishing@cabq.gov and delete if an email causes any concern.

Good Morning,

Please accept this letter for the 48-hour material for the January 18, 2024 meeting of the

Environmental Planning Commission (EPC). By vote of the Board of Directors, the Spruce Park

Neighborhood Association (SPNA) opposes the zone change from Low Density (R-MXL) to High Density (R-MX-H) at 1701 Gold Ave. SE; where the former University Church of Christ building occupies the 5 lots in question (agenda item 3).

Heidi Brown
President



Spruce Park Neighborhood Association
1603 Sigma Chi Road, NE
Albuquerque, NM 87106

January 16, 2024

Dear Chairman Shaffer and Members of the EPC:

Please accept this letter for the 48-hour material for the January 18, 2024 meeting of the Environmental Planning Commission (EPC). By vote of the Board of Directors, the Spruce Park Neighborhood Association (SPNA) opposes the zone change from Low Density (R-MXL) to High Density (R-MX-H) at 1701 Gold Ave. SE; where the former University Church of Christ building occupies the 5 lots in question (agenda item 3).

Allowing spot zoning with much higher densities and heights violates the very intent of the City's Historic Protection Overlays. The lots in question are essentially surrounded on three sides by the Silver Hill Historic Protection Overlay (HPO) comprised largely of detached single family, single story homes. The purpose of the HPO is to preserve the overall historic appearance of a neighborhood, and building projects in an HPO should be compatible with its traditional neighborhood character. It is absolutely inappropriate to use spot zoning to allow construction of a high-density apartment building, up to 65 feet tall (5 stories), to be built in this location essentially surrounded on three sides by an HPO comprised largely of single story residences.

Allowing spot zoning, with much higher densities and heights, sets an unacceptable precedent for other older neighborhoods in and near the Central Avenue Major Transit and Main Street Corridor. As an example, our own Spruce Park Neighborhood contains churches, and our neighborhood is largely within ¼ mile of the Central Avenue Major Transit and Main Street Corridor. Though we are not an HPO, it would be devastating to our property values and quality of life to rezone select parcels and allow construction of a 5-story apartment building next to our 100-year old single family homes.

The ABC Comprehensive Plan defines "Areas of Consistency . . . [which] will experience limited new development. Change that does occur will reinforce or enhance the existing character of those neighborhoods" (emphasis added, page 5-4). Additionally there are two policy goals that are important to the Spruce Park Neighborhood: (1) Policy 5.6.3 "Areas of Consistency: *Protect and enhance the character of existing single-family neighborhoods ...*" and (2) Goal 11.2 Historic Assets "Preserve and enhance significant historic districts and buildings to reflect our past ..."

For these reasons, our Neighborhood Association strongly objects to the proposed zone change. We are also in concurrence with similar arguments stated by Patricia Willson. She wrote as a resident of the Victory Hills neighborhood, even though she is also the Victory Hills Neighborhood Association (VHNA) president, a District 6 Coalition officer, and an Inter-Coalition Council (ICC) representative.

Regarding notification of this zoning change request, we wish to thank the members of the EPC for modifying the distance that will — if final city council approval is received--be required from a radius of 330 feet to 660 feet (Items 29,

32, and 36 of the current IDO revision, per the January 11, 2024 EPC hearing). Although this matter is of considerable interest to residents of the Spruce Park Neighborhood, we were not notified because our neighborhood is outside the 330-foot distance. The proposed requirement of 660 feet would have included us.

Thank you for the time and expertise that you volunteer on behalf of creating a better Albuquerque.

Sincerely,

A handwritten signature in blue ink that reads "Heidi Brown". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Heidi Brown
President

From: [P. Davis Willson](#)
To: [City of Albuquerque Planning Department](#)
Subject: EPC Jan. 18th meeting; 48 hour material
Date: Monday, January 15, 2024 10:54:27 AM
Attachments: [LTR 48hrUniv&GoldZoneChangeRev3.pdf](#)

[EXTERNAL] Forward to phishing@cabq.gov and delete if an email causes any concern.

Attn: EPC Chair Shaffer,

Please accept this 48 hour material regarding Agenda Item #3, the Zone Map Amendment for 1701 Gold Ave. SE.

Thank you,

Patricia Willson

Victory Hills NA: President
District 6 Coalition: Treasurer
Inter-Coalition Council Representative

January 13, 2024

Via email: abcto@cabq.gov
Attn: Environmental Planning Commission Chair Shaffer

Re: PR-2018-007157 / RZ-2023-00048 – Zone Map Amendment

EPC Chairman Shaffer,

Regarding the zone map amendment request for 1701 Gold Ave. SE that you will hear Thursday, January 18, 2024, please accept this 48-hour material for your review. Though I serve as the Victory Hills neighborhood association president (VHNA), am a District 6 Coalition officer and an Inter-Coalition Council (ICC) representative, these are my personal comments.

VHNA received the July 21, 2022, Notice of Decision, but neither D6 nor VHNA received the Neighborhood Meeting Request dated 10/15/23. This case was brought to my attention yesterday (Friday, January 12, 2024).

Please note my following concerns:

- Staff Report claims *“Staff is not aware of any opposition as of this writing.”* Yet, in the Report on Page 23 (III. AGENCY & NEIGHBORHOOD CONCERNS), Staff notes *“board members of the Silver Hill NA were split in regard to the project, with 8 members voting against, 6 members voting for, and two members abstaining.”* To claim there is no opposition is disingenuous.
- On Dec. 22, the Applicant received a letter from the Planning Department to discuss his request and provide suggested revisions. These suggestions were then incorporated into the Applicant’s Dec. 29th letter to the EPC Chair to justify the “spot zoning” created by this Zoning Map Amendment Request. This gives the appearance of the City Planning Department coaching applicants in order to accomplish an end run around Comprehensive Plan and/or Community Planning Area (CPA) Assessment goals, rather enforcing the City’s guiding Rank 1 Comprehensive Plan’s vision.
- Just because you can do something; should you? While all the justifications noted in the application technically fit the bill for higher density housing, there are many examples of 12 to 20 unit projects within the Central Avenue Premium Transit (PT) Corridor that provide a careful transition between MX-M and RM-L and/or R-1. The Near Heights CPA Assessment Report does support higher-density housing within PT corridors, but also notes the four districts with Historic registry and the Historic Protection Overlay that covers Silver Hill—originally platted in 1886. Which one of these zone types should be allowed across the street and adjacent to single-story, multi-family, low density historic homes?



Diagram of RM-L; 38' height maximum



Diagram of RM-H; 48'-65' height maximum

Perhaps the project pro forma only pencils out if it is 65' high (the 48' height maximum increases to 65' in the transit corridor). If that is the case, the Applicant could find a properly zoned property to maximize their financial potential rather than force spot zoning in this location.

I am personally in opposition to this Zone Map Amendment request—not because of opposition to higher density housing—but because it sets a precedent for spot zoning. Development should be based on the existing zoning, not what could be done if the zoning were changed.

The EPC recently took a firm stand regarding the Volcano Heights Urban Center (VHUC)—by recommending DENIAL of an applicant's request to remove the ban on drive-thru's—because it was at odds with the Comprehensive Plan's definition of the VHUC as a walkable, pedestrian oriented community. Please review the CompPlan goals and the Near Heights CPA Assessment before allowing a 65' building to be built across the street from this historic, multi-family neighborhood.



Looking south from subject property

I respectfully request you deny approval of this request. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "A. D. Willson". The signature is written in a cursive, flowing style.

Patricia Willson