

48-hour Comments Received after
10/21/25 and by 9 am on 10/26/25

First Name	Last Name	Interested Party	Other - Interested Party	Project Number	Comment	Attached PDF	Do you wish to submit an image?
Patricia	Willson	Local business owner			The IDO Update page notes that the public may submit "simple statements of support or opposition" in compliance with the 48-hour rule. I urge the Environmental Planning Commissioners to read all the cogent letters received from individuals, Neighborhood Associations and Coalitions--and not just tally the number of 'pro's' and con's'. A comment such as "YES!", or "Love it!" should not carry the same weight as a carefully crafted letter (of either support or opposition).	N/A	No
Patricia	Willson	Local business owner			Please note that altho I select "local business owner" under the "Interested Party" tab, I fit all the categories. This letter is being submitted ahead of the 48-hour deadline this weekend. Thank you.	2025_10_21LTRtoEPC.pdf	No
Patricia	Willson	Neighborhood Association Repres			Altho I selected "Neighborhood Association Rep", I am also a resident and local business owner. Please accept attached letter ahead of this weekend's 48-hour deadline for next week's hearing. Thank you.	2025_10_22LTRtoEPC48hr.pdf	No
Lisa	Huval	other	Nonprofit housing developer		Please see attached letter.	Homewise IDO Letter 10.25.pdf	No
Gabriel	Sautter	Resident			I support the update.	N/A	No
Patricia	Willson	Neighborhood Association Repres		PR-2018-001843	Please acknowledge receipt of the attached letter from the InterCoalition Council. It is signed by 18 representatives of Districts 1, 2, 4, 5, 6, 7, 9, the Paradise Hills Special Zoning District (PHSZD), and Bernalillo County. Thank You.	2025_10_23LTRtoEPCfromICCdraft4.pdf	No
Guy	Santo	Resident		TA-2025-00002	I oppose changes as too many and complex with little time to review, but which may drastically alter the neighborhood and city I chose to moved to based on existing characteristics and zoning. Don't force these changes on established neighborhoods.	N/A	No
Eleanor	Walther	Resident		TA-2025-00002	PDF submitted	EPC letter 48 hr rule.pdf	No
Eleanor	Walther	Resident		TA-2005-00002	See pdf	EPC IDO letter.pdf	No

Jane	Baechle	Neighborhood Association Repres	PR-2018-001843	Please find attached the written comments of the WSCONA Executive Committee which we submit under the 48 hour rules. We appreciate their inclusion in materials provided to the Commissioners. Thank you, Jane Baechle WSCONA President jane.baechle@gmail.com 505-400-6516	WSCONA Letter to EPC 48 Hr. Submission.pdf	No
Patricia	Willson	Resident		Special Hearing for October 28, 2025 - EPC Public Hearing October 28, 2025 at 08:40 AM Mountain Time - Zoom Link - Call in: (719) 359-4580 - Meeting ID: 546 472 9575 - Agenda for October 28, 2025: - TA-2025-00001 Text Amendment - Small Area - Martineztown/Santa Barbara CPO - Staff Report 113 pages - TA-2025-00002 Text Amendment - Citywide - Staff Report 228 pages - Attachment - Public Comments 313 pages - Attachment - Redline IDO Exhibit 709 pages Total number of pages to review = 1,363 I have written 5 letters to the EPC regarding the 2025 IDO Update. I hope the EPC has had enough time to carefully review the Staff Report (228 pages), the Public Comments (313 pages), the Redline exhibit (709 pages), and the MartinezTown/Santa Barbara CPO-7 (113 pages). That's a grand total of 1,363 pages of material. I would recommend denial until there has been adequate time for review.	N/A	Yes
Peggy	Norton	Resident		IDO comments. See pdf	ido comments 10.2025.pdf	No
Michael	Voorhees	Neighborhood Association Repres		Please see attached .pdf.	IDO 2025 Review-48 Hour Comments.pdf	
Rene'	Horvath	Neighborhood Association Repres	2025 IDO Annual Update	Submitted PDF document is attached,	48 hour letter for IDO-EPC Oct. 28 2025 hearing.pdf	No

Patricia	Willson	Resident			In the final minutes ahead of the 48 hour deadline, I would like to offer one last "simple statement of opposition."	2025_10_26Final48hr.pdf	No
Jordon	McConnell	Resident			Please find attached letter in support of most IDO amendments and some opposition. Let's build a pro-home ABQ and move beyond Exclusionary Zoning!	EPCLETTER-MCCONNELL.pdf	

10/26/2025

Dear EPC Chair Aragon, and fellow Commissioners,

I want to clarify that none of the 150 IDO amendments the EPC is reviewing came from neighborhood representatives. These same representatives are responsible to review land use proposals for their neighborhoods and provide feedback. The IDO update started with 99 amendments which was already too many amendments to review. It took weeks to analyze and research these first 99 amendments in order to pin comments onto the spread sheet. Once this comment period was closed, a whole new second spread sheet suddenly appeared unexpectedly with 51 more significant amendments. Instead of handling these 51 amendments separately, they were integrated with the initial 99 amendments, making a total of 150 amendments. The neighborhood representatives now had to weed out the new amendments and start their review all over again. This time, the comment period ended too early for many of us to complete a full review and post comments onto the second spread sheet. It is clear these amendments are significant zone changes that will have a negative impact on the character of our neighborhoods and its zoning protections.

Apparently, the staff report is focused on the second spreadsheet where they were able to round up groups that support these zone changes, believing it will solve the housing crisis. Unfortunately it won't, and it gives the impression that everyone supports all these changes, but they don't. What happened to the comments we pinned on first spread sheet where most of the Neighborhood representatives made comments on the initial 99 amendments? I did not see those comments in the staff report. Please note, these amendments will create conflicts within the community and not solve the housing affordability issue. Housing costs are market driven, and may only be affordable with government subsidies.

Albuquerque currently has a significant amount of housing on the market, in both homes 2,465 as well as 4,032 apartment vacancies. See below. There is a misconception that the IDO zoning is old and outdated. Not everyone realizes that the IDO replaced the prior zone code in May 2018, resulting in an increase in apartment development, with increased density, taller buildings, and reduced parking requirements. There are also zoning categories for town houses and duplexes. There is no need to do more zone changes. It will create more problems than solve, as there have been numerous appeals as a result of taller buildings being out of scale and character with the surrounding area, as well as complaints about the lack of parking. It does not pay to upset the community any further. Good Planning should prevent problems, not create them, by understanding area constraints and to maintain quality of life for everyone through good design that is compatible and complementary to the surrounding area. These amendments will not do that, and should not be approved.

The screenshot displays the Apartments.com website interface. At the top, there's a navigation bar with the logo and links for 'Manage Rentals', 'Sign Up / Sign In', and 'Add a Property'. Below this is a search bar with filters for 'Price', 'Beds/Baths', 'Home Type', 'Specialty Housing', 'Move-In Date', and 'All Filters'. The main content area is divided into two sections. On the left is a map of Albuquerque, NM, with numerous green diamond markers indicating apartment locations. On the right is a list of apartment listings. The first listing is 'Peaks at Sandia View' located at 1501 Indian School Rd NE, Albuquerque, NM 87102, with a price range of \$950 - \$1,375. The second listing is 'Wintergreen Apartments' located at 10800 Golf Course Rd NW, Albuquerque, NM 87114, with a price range of \$1,450 - \$2,350. The third listing is 'The Reserve' located at 1001 Tramway Blvd NE, Albuquerque, NM 87112, with a price range of \$1,118 - \$1,595. Each listing includes a thumbnail image of the interior, a brief description of the unit, and an 'Email' button.

Thank You,
Rene' Horvath

Date: October 21, 2025

To: Environmental Planning Commission

Re: 2025 Integrated Development Ordinance Biennial Update; 48-hour submission

Chair Aragon and Commissioners:

As I mentioned in my letter dated October 10th, the following recent pieces of legislation have already made many substantive changes to the IDO—yet with no data available regarding their success or failure.

ORDINANCE NUMBER	EFFECTIVE DATE	NAME	ALLOWS (IN PART):
O-24-69	1/28/25	AMEND IDO RE: APPLICABILITY, APPEALS...EASING RESTRICTIONS ON HOUSING DEVELOPMENT	Upzoning of residential in certain 1/4 mile corridors
O-24-13	8/3/24	2023 IDO ANNUAL UPDATE	Removal of certain facilitated meeting protections
O-22-54	7/27/23	HOUSING FORWARD	Allows 'casitas' permissively in R-1 zone citywide

One of these ordinances (O-24-69) is currently under legal challenge in District Court; approving amendments that overlap with a pending lawsuit could conflict with a court ruling.

Continuous major changes to the IDO defeat its purpose of providing stability and predictability for development—hard for the major players and basically impossible for small, incremental developers. Has anyone at the City done the research to understand the possible ramifications of all these changes? I have: see the following summary:

IDO UPDATES						
YEAR	ORD. NUMBER	# OF CHANGES	# OF EPC MTG.	# OF LUPZ MTG.	# OF COUNCIL MTG.	REMARKS
2019	O-20-10	256	6	3	2	Creation of "Citywide" and "Small Area" amendment classifications
2020	O-21-60	101	3	2	2	
2021	O-22-10	73	1	3	2	Add subsection to 6-3(D)(2) to include numbering and summary to explain intent, origin and need.* Also, Small Area Amend (HPO-5) included as part of update
2022	O-23-77	49	8	2	2	
	O-22-54	6				HOUSING FORWARD Introduced at Council by Mayor in Nov. 2022; referred to EPC to be heard as part of the Annual Update**
	O-23-72	1				Small Area: North 4th CPO-9
	O-23-73	1				Small Area: NW Mesa VPO-2
	O-23-76	1				Small Area: East End Addition HPO
2023	O-24-13	60	2	4	1	Revise 6-3(D) to change from Annual to Biennial update*
	O-24-11	1				Small Area: VHUC (allow drive-thru's)
	O-24-12	1				Small Area: VPO-2 (require referral to Tribal Reps)
	O-24-17	3				Small Area: Rail Trail
2024 NO UPDATE; SWITCH FROM ANNUAL TO BIENNIAL UPDATES						
	O-24-69	8				This legislation was introduced 12/16/24 and passed at Council on 1/6/25. There was no review by EPC, LUPZ, or public meetings. The bill contained 8 sections; half dealing with applicability, administrative appeals, and changes to the amendment process. The other half increased housing density in certain areas, removed height limitations, and reduced parking requirements. The Mayor did not sign nor veto the bill; pursuant to City Charter, Ordinance was in full effect beginning 1/16/25 without Mayor's approval or signature. There is litigation pending.***
2025		151				1st EPC meeting October 28, 2025 Additional amendments include 12 Council and 3 Mayor
		712	≈ Number of existing and proposed changes to date			
						* Amendment authored by ICC (InterCoalition Council) member(s)
						** The first time that amendments were added outside of the prescribed 3-step process for updating the IDO
						*** This bill is not about affordable housing. See attached letter.
NOTE: JUST LIKE THE PROCESS, MANY LINKS ON THE CITY'S IDO WEBSITE ARE BROKEN...						

Previously I urged you to have at least two hearings on this case. At this point, I recommend denial of the entire 2025 Biennial Update, and a moratorium on future amendments until the Update process is fixed. These are my personal comments.

Respectfully,

Patricia Willson

Albuquerque resident since 1972

Date: October 22, 2025

To: Environmental Planning Commission
Re: 2025 Integrated Development Ordinance Biennial Update; 48-hour submission

Chair Aragon and Commissioners:

The EPC will be receiving many messages of support, no doubt including the following messaging from a local group:

"I support the proposed IDO updates because they make Albuquerque more affordable, walkable, and resilient."

Similarly, many comments pinned on the IDO spreadsheet—"Good idea", "Support", "Agreed!"—offer no specifics on how that amendment might increase the supply of affordable housing or create more walkable and resilient neighborhoods. While these messages of support may outnumber the messages of opposition, they should not carry the same weight as letters that provide facts that counter the re-zone/upzone narrative.

Today, it's not the residential neighborhoods that are broken—it's the corridors that need fixing. Adaptive re-use of decayed commercial buildings has worked successfully elsewhere and is a better option than encroaching on established residential neighborhoods. Many parts of town were originally built with duplexes, garden apartments, etc.; you can still do this, it just requires a zone map amendment from R-1 to RT or R-ML.

There seems to be magical thinking that a bodega on every corner will send us back to a gentler time. The reality is that corner stores, once very prevalent in Albuquerque, have gone the way of the buggy whip manufacturers. Manuel's and the Girard Market (pictured below) were supplanted by Walmart, and we all know what happened there...



Continuous and substantive changes to the IDO defeat its purpose of providing stability and predictability for development—hard for the major players and basically impossible for small, incremental developers. Members of the InterCoalition Council (representatives from city and county coalitions of neighborhoods) have been begging for a better IDO Update process since its initial update in 2019. Our pleas have fallen on deaf ears. Planning needs to be done by PLANNERS, not POLITICIANS!

Previously I urged you to have at least two hearings on this case. At this point, I recommend denial of the entire 2025 Biennial Update, and a moratorium on future amendments until the IDO Update process is revised.

These are my personal comments.

Respectfully,

Patricia Willson
Albuquerque architect, neighborhood activist and resident since 1972

ICC Inter-Coalition Council

The ICC is a Council of Coalitions of Albuquerque and Bernalillo County Neighborhood Associations that has been meeting since May 2014 to reach consensus on broad, common concerns. Its purpose is to promote stronger, better neighborhoods and communities through group action and interfacing with the governmental, social, environmental, cultural and historic needs and interests of all residents.

Date: October 23, 2025
Re: 2025 IDO Biennial Update; 48-hour submission
Attn: Environmental Planning Commission
From: Inter-Coalition Council (ICC) IDO Working Group Committee

Chair Aragon and Commissioners,

Members of the ICC IDO Working Group have been reviewing the huge increase of amendments proposed—from the Pre-EPC Submittal (99 changes on July 11th) to the current EPC Submittal of **≈151 changes**. We have posted comments, written letters, spoken at Council and Committee meetings. Rather than comment now on any of these specific amendments, we are once again questioning THE BROKEN PROCESS.

Since its first update in 2019, there have been over 700 amendments adopted and proposed—far, far more than any other jurisdiction in the country. Several of these changes have limited public notification and appeal rights. **We question the need to continually change an ordinance that was designed to provide stability and predictability to our zoning code.** Albuquerque has a rich history of urban planning that truly considered its unique environment and cultural diversity...we have abandoned that in favor of a rubber-stamping of land speculation. There was a reason we had a two-foot-high stack of Sector Development Plans; we are not “OneAlbuquerque,” but a collection of distinctive and vibrant neighborhoods.

Please consider your name—the ENVIRONMENTAL PLANNING Commission (note the definitions below)—and **look to the sustainability of our future** rather than the short-term financial gain of the present.

We are continuing to review the options for recommended conditions of approval and appreciate the Staff Report’s Recommendation to Continue PR-2018-001843/TA-2025-00002 to the November 20th EPC hearing. However, we **Recommend Denial** of the 2025 IDO Biennial Update.

Signed,
ICC IDO Working Group Committee:

Michael Brasher, District 9
Patricia Willson, District 6
Jane Baechle, District 1
Rene’ Horvath, District 1
Merideth Paxton, District 6
Eleanor Walther, District 2
Jaemes Shanley, District 7
Elizabeth Haley, PHSZD, County
Peggy Neff, District 7
Peggy Norton, District 2
Willa Pilar, District 7
John Hooker, District 6
Debbie Conger, District 6
Mike Voorhees, District 5
Janet Simon, District 6
Steve Wentworth, District 4, County
Jim Price, District 1
Holly Hitzemann, District 6

 **en·vi·ron·men·tal**
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adjective

1. relating to the natural world and the impact of human activity on its condition.
"acid rain may have caused major environmental damage"
2. relating to or arising from a person's surroundings.
"environmental noise"

 **plan·ning**
/ˈplaniŋ/

noun

the process of making plans for something.
"mass production methods call for detailed planning"

Similar: [preparation\(s\)](#) [organization](#) [arrangement](#) [forethought](#) [design](#) 

- the control of urban development by a local government authority, from which a license must be obtained to build a new property or change an existing one.
"the local planning authority"

Maher, Nichole

From: jimprice@swcp.com
Sent: Sunday, October 26, 2025 9:36 AM
To: PlanningEPC
Subject: Amount of IDO amendments unfair and unreasonable

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Date: October 26, 2025
To: Environmental Planning Commission
Re: 2025 IDO Biennial Review Proposals
Dear Chair Aragon and Commissioners,

Ordinances are laws enacted by a community or municipal government. The current proposal is to make 151 changes to the Integrated Development Ordinance. This is an “unreasonable” amount that a “reasonable” person who attempts to be “reasonably” informed can not keep up with. In fact, since 2019, this will make roughly 650 changes to the Integrated Development Ordinance (IDO). That’s roughly 10 ordinance modifications or additions a month.

Since the time of Ur-Nammu, Hammurabi, The Old Testament and the Torah, written law is intended in tended to be just, fair and proper to all involved. This abuse of legislative process is not fair or reasonable to all involved. This is self-evident when meeting with a councilor who is not familiar with the IDO. This is evident when councilors ask each other what the current ordinance is before taking a vote during a council meeting. This is evident when the Police Department puts out advice that directly conflicts with the lighting ordinance. It is all too much for reasonable city personnel and citizens to keep up with.

When Moses came down from the mountain with laws inscribed in stone, in God’s wisdom he gave only 10 commandments as opposed to a confusing morass of ordinances.

This IDO process does not serve the citizens of Albuquerque. The IDO is designed to serve the development industry and does not really address the real issues it purports to address. The development industry tells us they are the panacea for all of the community’s ills if we only give them carte blanche. Opinion pieces and editorials by the Developer Industry tell us they will solve homelessness, the lack of medical services and affordable housing if we only get those pesky Neighborhood Associations and their frivolous appeals out of the way. (When Councilor Lewis was asked for a list of the frivolous appeals he based 024-069 upon, his assistance Giselle Alvarez sent a list that included the appeal of the Wal Mart at Coors and Montano which he supported. It was also a list of only 12 list and not enough to modify legislation about.)

I, with others call for a modification of this ridiculous and unreasonable process so we can get to the real business of being a city.

Jim Price
Resident since most of this place was dirt.

Date: October 19, 2025

To: Chair Aragon and Commissioners

From: Eleanor Walther, Vice President, Rio Grande Blvd Neighborhood Association

Re: 2025 IDO Review

The 2025 IDO Review contains more than 150 proposed amendments—an overwhelming number that makes genuine public review and informed participation nearly impossible. This volume of changes effectively shuts out residents, neighborhood associations, and even commissioners from providing meaningful input.

Many of these amendments appear designed to **codify and expand the “upzoning” agenda** embedded in O-24-69 and the rejected “Opt-in” zoning bill, R-25-167. O-24-69 is currently under legal challenge in District Court. It is entirely inappropriate—and potentially irresponsible—for the City to advance IDO changes that overlap with a pending lawsuit. Any such amendments must be **deferred until the court rules**.

Let’s be honest: **how much have you heard about these amendments in the public domain?** How many of you were aware of them before the last EPC meeting? If commissioners and highly engaged residents are struggling to keep up, what chance does the average citizen have? The City has created a process so opaque and cumbersome that it **excludes the very people whose neighborhoods will be most affected**.

Many of the proposed amendments would **increase residential density citywide while reducing parking requirements**. Proponents claim these changes will solve housing shortages and lower costs. In reality, they will **erode single-family neighborhoods, undermine property rights, and accelerate gentrification** in lower-income areas.

Even the EPC’s own actions contradict this agenda. You recently removed housing development from the 35-acre **UNM Lobo Crossing Project (ZMA-2025-00014)**. If housing density is such a priority, why eliminate that opportunity while pushing to convert R-1 zones to R-T elsewhere? This inconsistency raises serious questions about the integrity of the planning process.

Let’s be clear: **increasing density will not solve homelessness**. The unhoused crisis stems from complex social, economic, and behavioral factors that cannot be solved by rewriting zoning codes.

This plan rests on a **“Field of Dreams”** theory of urban planning—change the zoning and assume affordable housing, corner markets, and efficient transit will somehow appear. The far more likely outcome is that **developers will continue to build for maximum profit, HOAs will enforce exclusionary rules, and wealthier neighborhoods will remain untouched while low-income areas bear the burden of “increased density.”**

Past IDO changes have already failed to deliver. Only **14 accessory dwelling units** have been built. Instead of doubling down on failed strategies, the City should investigate **why these measures did not work** and address the systemic barriers that block true housing diversity and affordability.

The City's own materials make thorough review nearly impossible. Many amendments conflict with one another or create **cascading effects** that are not disclosed. I have spent hours entering comments into the official spreadsheets, cross-checking redline documents and amendment lists—only to find that my pre-EPC comments were not carried forward. This has added significant, unnecessary time to the review process.

I urge the Commission to **recommend “Do Not Pass”** on any amendments that mirror the legislative changes in O-24-69 until the court case is resolved. The total number of amendments must be **reduced to a manageable level**, and the public must be given a **real opportunity** to understand and comment on the proposals. Anything less undermines transparency, accountability, and public trust.

Respectfully,

Eleanor Walther

Vice President, Rio Grande Blvd Neighborhood Association

To: EPC Commissioners

From: Eleanor Walther, Rio Grande Boulevard Neighborhood Association

Date: October 25, 2025

Subject: Biennial Update 2025

Between your Planning Department briefing and the EPC meeting on October 28, you have had only 12 days to review 210 proposed amendments to the IDO, and just one week to review the 228-page staff report. That is not enough time for anyone—commissioners or the public—to meaningfully analyze and respond to such an extensive set of changes.

The staff report includes only comments submitted by October 10. Yet many additional comments were made after that date on the amendment spreadsheet, and none of the comments from the pre-EPC spreadsheet were carried over into the post-EPC version. As a result, important public input has been left out of the record.

I personally submitted detailed comments on both versions of the spreadsheet, including after October 10. If you rely solely on the staff report, you will not see my input—or that of many others who invested significant time reviewing these amendments and attending briefings. It is not possible to present this level of analysis in a two-minute public comment slot.

Proceeding without reviewing all relevant documents would effectively disregard much of the public input this process is supposed to consider. That would be a serious disservice to residents and a failure to uphold the purpose of public review.

You are being asked to evaluate major changes to the IDO. Doing so responsibly requires a full and fair review of all available information. If you do not **have adequate time to do that before the October 28 meeting, I urge you to defer this case.** Transparency and integrity in this process demand nothing less.

Dear Chair Aragon, Members of the Environmental Planning Commission, and the Planning Department,

I am writing to express my enthusiastic support for the majority of the proposed IDO amendments. These reforms move Albuquerque toward a more livable, affordable, and opportunity-rich future — one that can actually keep young people like me here.

I especially support the amendments that make duplexes, cottage courts, and townhomes legal again. I'm currently looking to buy a condo or townhome, but these home types are extremely limited and expensive in Albuquerque. Cottages to buy simply don't exist. When I've looked in cities like Portland, Oregon and Minneapolis, where these housing types are now widely legal, I've found small, beautiful, and affordable homes near light rail that people my age can actually buy. Why not here? Why not give young residents a reason to stay and invest our talents in Albuquerque instead of leaving for cities that already embraced these changes?

After reviewing the full amendment list, I want to express my clear support and opposition as follows:

I Support:

- **Legalizing *duplexes citywide*** (a huge step for affordability and fairness).
- **Allowing *cottage courts*** (beautiful, community-oriented homes that fill a missing middle need).
- **Allowing *townhomes*** in more areas (a proven, attainable ownership option).
- ***Simplifying ADU/casita rules*** to make small-scale housing easier.
- ***Encouraging commercial-to-residential reuse*** to bring life back to underused corridors.
- ***Reducing or removing parking minimums***, especially near transit. Parking mandates are **wasteful, arbitrary, and inflexible**. They inflate costs, consume valuable land, and make infill housing harder to build. Removing parking minimums has been one of the most effective ways cities have found to help housing production catch up to demand.
- ***Encouraging small businesses and corner stores (bodegas)*** to help walkability, provide daily necessities close to home, and support entrepreneurship. This complements parking reform by creating neighborhoods where fewer parking spaces are needed in the first place.
- ***Raising modest height minimums*** in corridors and centers to support vibrant mixed-use areas.
- **Items ZC-3, ZC-4, and ZC-5 (Legislative Rezones)**: These rezonings take proactive steps to align zoning with the Comprehensive Plan and reduce procedural barriers that have slowed infill housing for years. They make it easier to understand processes that the City Council has already passed.
- **Height Maximum Reductions**: I also support reducing overly restrictive height maximums, which have been **arbitrary, wasteful, and counterproductive**. Height caps

often prevent good design, reduce flexibility, and suppress the very kind of mixed-use and infill development our city needs most.

- ***Enabling mixed-use infill*** that helps small developers reinvest in existing neighborhoods.
- ***Streamlining approvals for infill and affordable projects.***
- ***Removing unnecessary barriers to accessory dwellings and small-lot development.***
- ***Supporting housing diversity and affordability***

These changes align with the Comprehensive Plan's vision for infill, affordability, and economic vitality. They also help close the gap on the **55,000 new homes** Albuquerque will need by 2045.

I Oppose:

- **Item 63 (Historic Buildings – 50-Year Automatic Review):** Adds cost, complexity, and punishes ordinary owners. Historic buildings are best preserved through cultural love and use, not extra red tape.
- **Item M-3 (Character Protection Overlays):** While the majority requirement is an improvement, CPOs have been widely abused to block new housing and should eventually be phased out.
- **Item 97 (Multifamily Near R-1/R-A):** Arbitrary and contrary to the Comprehensive Plan. The IDO already includes contextual design standards that address scale and compatibility.
- **Item 7 (Preservation Costs):** Preservation is valuable, but the financial burden should not be externalized onto individual property owners without city support.

These reforms are not just technical fixes but they are a moral and economic imperative. If we want Albuquerque to be a place where people can stay, raise families, and contribute, we must legalize more housing choices, remove unnecessary barriers like parking mandates, and make it possible for neighborhoods to evolve naturally over time.

Thank you for your consideration and for your work in shaping a stronger, fairer Albuquerque.

Sincerely,

Jordon Bennett McConnell

Downtown Core, Albuquerque, NM



October 23, 2025

Dear Environmental Planning Commission members:

Homewise is writing this letter in support of the proposed changes to the IDO that will make it easier, faster and more cost-effective to build housing in Albuquerque.

Homewise is a nonprofit, Community Development Financial Institution (CDFI) whose mission is to help create successful homeowners and strengthen neighborhoods so that individuals and families can improve their long-term financial wellbeing and quality of life. As part of our mission, Homewise develops mixed income, for-sale communities. Since our founding in 1986, Homewise has built or renovated approximately 1,000 high-quality, affordable for-sale homes, including ten mixed income communities within the last decade.

Homewise pioneered the integration of homebuyer preparation, home purchase financing, and construction of affordable housing units to help modest families achieve financial security through homeownership. We know from our experience serving modest income potential homebuyers that the lack of housing supply is driving up housing costs for both renters and homeowners. Current zoning rules in Albuquerque are contributing to the housing supply problem. To facilitate the production of more housing, the City of Albuquerque needs to make changes to its land use code that:

- Fosters construction of missing middle housing, such as duplexes and townhomes. This is especially important to create modest starter homes that are more accessible, pricewise, for first time homebuyers.
- Allow for more density where it makes sense to do so, to support the creation of more housing units as well as a mix of housing types that are affordable to modest income Albuquerque residents.
- Reduce or eliminate other requirements that drive up the cost of building housing, which ultimately get passed on to renters and homebuilders. In particular, reducing or eliminating parking mandates will help lower housing costs, promote compact growth, and make better use of limited land.
- Increase the efficiency and predictability of the review and approval process.

Homewise supports the proposed changes to the IDO that promote a mix of housing types (including townhomes, duplexes, ADUs and cottage developments); that promote increased density and building heights in activity centers, along major transit corridors, and other areas where higher density makes sense; that reduce minimum lot size; that reduce minimum parking requirements; and that simplify review and approval requirements for housing projects.

WEB: homewise.org

SANTA FE OFFICE

1301 Siler Rd, Bldg D
Santa Fe, NM 87507
Phone: 505-983-9473

ALBUQUERQUE OFFICE

500 2nd Street SW
Albuquerque, NM 87102
Phone: 505-243-6566

In addition, Homewise supports the proposed change that would allow bodegas in residential areas, which will help create walkable neighborhoods. Homewise strongly urges the Environmental Planning Commission to support these changes, which will lead to more housing across the housing spectrum in our community for Albuquerque residents.

Sincerely,

A handwritten signature in blue ink that reads "Lisa Huval". The signature is written in a cursive, flowing style.

Lisa Huval
Chief Government Affairs Officer

Date: October 25, 2025
To: Daniel Aragon, EPC Chair
EPC Commissioners

From: Michael T. Voorhees

Re: IDO 2025 Review-48 Hour Comments

NM Stat § 3-21-6 (2024)

“B. No zoning regulation, restriction or boundary shall become effective, amended, supplemented or repealed until after a public hearing at which all parties in interest and citizens shall have an opportunity to be heard...”

State law is quite clear on this point and uses the singular form of the noun “regulation”.

And yet the City is attempting to change, en masse, 151 regulations simultaneously via the same hearing, where each party in interest and citizen is allowed a total of 2 minutes. That is 120 seconds, combined, for the whole lot. That comes to 0.79 seconds per proposed regulation. No reasonable person can express any meaningful or substantive comment in either support or opposition in such a short duration of spoken comment, and no public official could reasonably claim to have heard all parties in interest and citizens on each such proposed regulation or that 0.79 seconds was sufficient to qualify as “an opportunity to be heard.”

The City’s IDO amendment process is a violation of state law and a farce. The previous 100 amendments per year were bad enough. Now the City is upping the ante.

Do the lawful thing and vote to recommend denial of the entire package as a mockery of responsible government.

If the City wants to make 151 changes to its zoning regulations, it must hold 151 hearings with 151 separate notices. Any Councilor or Mayor that endorses this blatant disregard for the rule of law should be voted out of office.

Respectfully,
Michael T. Voorhees

October 25, 2025

I have put some notes on the spreadsheet, and want to express support for what others have written in detail – Patty Willson, Jane Baechle, Eleanor Walther, Rene Horvath. I am particularly distressed to find the amendment upzoning major transit corridors after having just had Menaul in the North Valley redesignated to major transit corridors opposed by all four adjacent neighborhood associations, the North Valley Coalition and our City Councilor. There was absolutely no mention made of consequences except compliance with the Comp Plan, which we all knew was a lie. That is how deceitful this process has become and generally, residents know nothing about it until they are impacted. Several communities have put up new gates, at least two others have looked at historic protections. It would seem wise to wait until O-24-69 is resolved by the Courts, and it is a sly move to steamroll over the rejection of R-167 with some of the amendments. The number of amendments is so overwhelming, there is no way I can present them to my board and ask for a vote, so although I am President of the North Valley Coalition, these comments are my own. I have no idea how to respond in a meaningful way. Perhaps we should look at 20-30 a month for the next 8 months.

Peggy Norton

WSCONA

West Side Coalition of Neighborhood Associations

Date: October 25, 2025
To: Daniel Aragon, EPC Chair
EPC Commissioners
From: WSCONA Executive Committee
Re: IDO 2025 Review-48 Hour Comments

I am writing here as the representative of the West Side Coalition of Neighborhood Associations (WSCONA) Executive Committee to outline our objections to the 2025 IDO Review. They can be distilled into two significant and irremediable flaws.

The first flaw is the IDO review process itself, impossible for the majority of ABQ residents to engage with and ensuring that the vast majority of community members will fail to understand what is proposed or have a voice in development which impacts them. The Spreadsheet of Proposed Changes includes 151 items. The Staff Report requires 228 pages to discuss the proposed changes including potential options for resolving conflicts between competing amendments. The process itself begs the question of whether the City is interested in either thoughtful analysis of proposed changes or public participation in the review. The apparent answer is that the City is not.

The second flaw in the 2025 IDO review is the City's cherry picking of data to support its proposals, specifically those intended to "up zone" development to increase density. The City repeatedly cites the Root Policy Research, "Albuquerque Region Housing Needs Assessment (2024)" while ignoring the fact that it uses data from the period of 2010 to 2022 over a five county area (Bernalillo, Sandoval, Valencia, Torrance and southern Santa Fe county) to project housing needs for the *city* of Albuquerque. The City also cites a report by Alex Horowitz from The Pew Charitable Trust as evidence that zoning changes which increase housing supply will produce more housing units and lower costs including lower rents.

What do other data sources report? U.S. Census Bureau QuickFacts: Bernalillo County, New Mexico, provides July 1, 2024 population estimates for both ABQ and Bernalillo County which are 0.7% lower than those of April 1, 2020. In a 2023 UNM BBER report, UNM GPS researchers projected weak population growth for the state and Bernalillo County from 2020-2040.

In 2024, ABQ had a rental vacancy rate of 6.7% according to the US Census Bureau, Current Population Survey/Housing Vacancy Survey, March 18, 2205, a level Horowitz data indicates is associated with rental increases below 0% (or decreasing). UNM BBER reports that COA issued an average of 1,457 residential building permits (both multi-family and single family) yearly between 2010 and 2022 with over 1,700 in 2022. Clearly, there are sources of relevant data that should be considered.

Increased housing density increases land costs with concomitant increases in property taxes and decreased affordability of single family homes, historically a significant mechanism for building wealth and contributing to intergenerational wealth. This has been the experience of the city of Vancouver, B. C. Between 1970 and 2020, Vancouver tripled the number of residential units, primarily by adding density. It also has the most expensive home prices in North America. "The more density a city allows, the more lucrative its land becomes for those in the business of buying and selling urban property." (Patrick Condon, "Why Is Vancouver So Insanely Expensive?", *MacLeans*, January 16, 2025).

Increased density exacts costs beyond the cost of housing alone. These costs include demands on natural resources, ie water, and the aridification that accompanies increasing the built environment. Albuquerque's abundant natural resources, historic neighborhoods and public spaces represent both an economic asset and a part of our collective heritage. Any increased density in the built environment needs to respect those assets. Development decisions need to consider the environment and sustainability. IDO amendment proposals need to be informed by the widest and most credible evidence and analysis.

This 2025 IDO review effectively became public less than 4 months ago. Beyond a small group of neighborhood advocates and special interest groups, the public has no clue what has been proposed or what its reasonably expected impacts will be. As such, there is no reason to believe that the upcoming EPC hearing or hearings will be sufficient to adequately evaluate 151 consequential and economically costly proposals. We respectfully request that the EPC recommend denial of the entire 2025 Biennial IDO review. Further consideration of proposed IDO amendments must include notice sufficient for the average citizen to understand what is contemplated and provide hearings adequate to ensure all residents have the opportunity to be heard on all proposed changes.

Thank you.

Respectfully submitted,

Jane Baechle
WSCONA President