

Public Comments  
EPC IDO Draft Submittal - Hearing #1 April 6, 2017

No.	Name	Representing	Date	Comment / Question / Request for Change	No Change / Explanation	Change
<b>Below are comments directed to the Environmental Planning Commission (EPC), received prior to the 21 March 2017 comment submittal date.</b>						
1	Kent, Jason	Denish Consulting	12/30/16	We appreciate having been able to meet with City staff to become better educated about the impact of the proposed consolidated and updated IDO on properties currently undergoing development by the Garcia Family, as well as on other properties owned and occupied by them within the City. Based on our current (better) understanding of the updated IDO, the Garcia Family should be in a position to support the IDO as it progresses through City processes, subject to further review of various details.	Staff appreciates the public's engagement with the various drafts of the IDO.	
2	Kent, Jason	Denish Consulting	12/30/16	A general suggestion we have at this time is that the IDO could be improved with more specific language in the adopting ordinance which would accomplish 2 things:	See Lines 3 and 4.	
3	Kent, Jason	Denish Consulting	12/30/16	(1) Allow owners with properties now in the development process to retain current zoning for applications first submitted during a 6 to 12 month transition period after adoption of the IDO, so that investments in planning which have been made based on existing zoning (but which were not submitted or finalized by the adoption date) will not have to start over from scratch under new zoning concepts.	<p>Any complete application submitted to the City's review and approval process prior to the effective date of the IDO will be allowed to proceed through the process under existing zoning rules.</p> <p>Decision-makers will need to decide whether there will be a transition period after adoption and before the effective date of the IDO where projects may be submitted under the current zoning code or under the IDO. City Council will need to determine the length of the transition period and what procedures staff will follow during that period with input from the project team, City Legal, and stakeholders.</p>	Staff intends to build transition period language and procedures into the enacting ordinance for the IDO, based on City Council discussion.

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4	Kent, Jason	Denish Consulting	12/30/16	(2) Allow a similar 6 to 12 month transition period after adoption within which owners may submit minor zoning correction and rationalization suggestions to the Planning Department for contiguous parcels which wind up with inconsistent internal spot-zones (for example - or other anomalies), so that they can be administratively corrected by the Planning Department without formal rezoning, as long as such corrections are not materially detrimental to or otherwise inconsistent with the IDO as adopted.	The conversion map has been available on the project webpage for public review and comment since April 2016 and will continue to be available throughout the adoption process. Planning staff encourage property owners to review the proposed conversion for their properties and submit comments if the proposed zoning is inconsistent with existing entitlements. See also Line 3.	Staff intends to build in "errors and corrections" language in the enactment ordinance that allows corrections to be made by Council before the effective date for mistakes to the zoning map or text.
5	Mexal, Catherine		1/2/17	Where is it defined exactly who can reside in those 18-person facilities that are proposed to be permitted in Wells Park? We've already got sex offenders 2 blocks away on 3rd and 6 blocks away on 4th.	See Page 391-2 for a definition of "Community Residential Facility." In contrast to "Group Homes," These facilities are for "protected classes," individuals whose right to housing is protected by the federal Fair Housing Act.	

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6	Mexal, Catherine		1/2/17	Somewhat like the "bail bond" issue*, if it probably can't ever happen in Wells Park, why permit it in the first place? We were told at a WPNA meeting that our homes and lots are too small to actually accommodate such a facility, so why is it even permitted? (* As nearly as I can tell, it looks like bail bond offices are no longer an issue for Wells Park. Thank you!)	<p style="text-align: center;">See Line 5.</p> <p>Because of the federal Fair Housing Act, we are required to allow for these types of facilities throughout the city; they cannot be eliminated completely from any area that allows residential uses. This is why they are tied to zone districts that apply citywide, with a broader range of locations and property sizes that would accommodate different sized facilities.</p> <p>Regarding bail bonds, the commenter is speaking about land currently zoned SU-2/S-R, which is proposed to be converted to R-T. The R-T zone does not allow "personal and business services," which is the IDO use that includes bail bond offices.</p>	<p>On page 106, remove the "P" for Community residential facility, medium from the R-T zone column. Current practice for permitting Community Residential Programs does not allow facilities for 10 or more residents in R-T or R-LT zones.</p> <p>On page 123, in the USS for Community Residential Facility, consider incorporating distance separation requirements from current Community Residential Programs Handbook.</p> <p>On page 392, in the definition for Community Residential Facility, small consider changing the maximum number of residents 10 to match current practice.</p>

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7	Mexal, Catherine		1/2/17	Or better yet, why is Wells Park being proposed as R-T? Is it because we've been bundled with Sawmill which has the space available for such facilities? Maybe it's time to de-couple Sawmill from Wells Park? We are consistently small- and medium-sized homes, just like much of Downtown which is R-1A and -1B.	The IDO aims to most closely match the permissive uses allowed by existing zoning. The Sawmill/Wells Park SU-2/S-R zone allows both R-1 uses and limited R-T townhouse development, as well as limited R-C, C-1, and C-2 uses, which is why this area is proposed to be converted to R-T. We are aware that the permissive uses allowed by existing zoning do not always match the way that development has occurred on the ground, and a process to address those mismatches and propose discretionary zone changes is intended to be part of the CPA assessment process after IDO adoption. If we do change the community residential facility uses to only allow small facilities in R-T, then for the purposes of that part of the discussion, the change in zone categories would not change what is allowed in terms of community residential facilities, since small community residential facilities are allowed in the R-1 zone districts.	
8	Fisher, Jim		1/4/17	The term "..single family detached" should be reconsidered to allow for the now popular duplex style of residence where just two families occupy one dwelling. They are basically two separate attached dwellings and differentiated from multi-family. This allows for slightly higher density in residential zones and better use of traditional services. It also addresses the aging population who don't want to move to higher density areas. This concept is being used in other states and communities for that exact reason.	Duplexes (referred to in the IDO as "Dwelling, two-family detached") are permitted uses in all R-T, R-ML, and MX-T zone districts (see Table 3-2-1).  Accessory Dwelling Units ("Dwelling unit, accessory") are permissive or conditional uses in those mapped areas where SDPs currently allow such uses (see Section 14-16-3-3.6.E).	

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9	Schroeder, Carl		1/5/17	Regarding the use and value of my property at Lyons and Paradise Blvd, I am not shocked that the Planning Department continues to align with corporate and special interests to consciously create those previously discussed "unintended consequences" in a plan to disrupt the life long plans of everyday Albuquerque land owners and tax payers. I do not approve of removing my property from SU-1 designation and demand that you respect small landowners in your grand IDO plan, leaving Special Use-1 (SU-1) the designation for my property, as it has been for at least the past 30 years.	Approved site plans (which SU-1 zones are based on) will continue to remain valid after the adoption of the IDO until the site plan expires or is amended by the owner. More information is needed about what property the commenter is referring to and what aspects of the proposed zoning for this property are not consistent/compatible with the current entitlements associated with the existing SU-1 zoning.	

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9 (cont'd)	Schroeder, Carl		1/5/17	(cont'd)	<p>ABC-Z is proposing to replace the City's existing system of over 700 individual zones to a set of 20 zones. The project team used existing zoning maps to identify where today's zones are and replace them with the closest match to the proposed zones in terms of allowable uses and intended densities/intensities. The project team converted SU-1 zones based on information available within the GIS data for permissive land uses and matched these as closely as possible to one of the proposed zone categories, described in the draft Integrated Development Ordinance (see chapter 14-16-2 Zone Districts).</p> <p>Note that in the IDO, Special Use zoning (NR-SU) will be more strictly applied to highly specialized uses that have impacts on surrounding property and need additional levels of review. See Section 14-16-2-5.5 for a description of the NR-SU zone in the IDO. For general commercial uses, the proposed conversions are more appropriate.</p>	
10	Anderson, Bonnie	Huning Highlands Historic District Association (HHHDA)	1/7/17	We applaud your efforts on this vast and important undertaking. We have reviewed the current EPC Draft of the ABQ IDO, and at our recent Huning Highlands Historic District Association Board meeting, with the assistance and advice of C. David Day, we voted to request the following changes and additions:	Staff appreciates HHHDA's engagement with and input on the various drafts of the IDO.	

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11	Anderson, Bonnie	HHHDA	1/7/17	<p>1. HPO-4 Standards &amp; Guidelines, Huning Highland Overlay Zone Development Guidelines, page 31 Map: Huning Highland Historic District: Significant, Contributing, Non-contributing buildings, 1982.</p> <p>CONTEXT: This map is 35 years old, and needs to be updated to preserve the fabric of the HHHDA district. During the intervening years, many buildings originally deemed Noncontributing have gained age and importance in the area. In addition, some styles, such as Moderne and Mid-Century modern, have since become respected architectural contributors. Until a Map update can occur, Non-Contributing structures should be included with Significant and Contributing buildings procedure for review in cases of demolition. This will allow a case-by-case update of buildings (threatened by demolition) by L.U.C.C. Please update page 31 map with asterisk or a note:</p> <p>ADDITION "Update 2017: Buildings marked 'Non-contributing' on this map which are 50 years of age or older as of the year 2017 (age as determined by historic maps such as the Sanborn Insurance Maps) might now contribute value to the district. Such structures shall require a Certificate of Appropriateness for demolition, following the review procedure for Contributing buildings."</p>	<p>This comment refers to a map on Page 31 of the Huning Highland Historic Overlay Zone Guidelines. Modifying existing Historic Overlay Guidelines is not part of the scope of the ABC-Z project. Updates to these guidelines would need to be handled as a separate process reviewed by the LUCC (Landmarks Commission) and approved by City Council.</p> <p>Within all designated HPOs, Staff has review authority for all demolition of existing structures, which is described on page 333, Certificate of Appropriateness – Minor. Within all designated HPOs, the LC has review authority for demolition of a landmark or a contributing structure, which is described on page 342, Certificate of Appropriateness – Major. These comments are more appropriately addressed in the Procedure section of the IDO. See Line 13.</p>	<p>On page 344, Section 5-5.2C.1.c, add a new map of the EDO CPO-1 as an area that is covered by the "Demolition of Non-Designated Structure Outside of HPO" to retain Staff and/or LUCC review of structures over 50 years old.</p>

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12	Anderson, Bonnie	HHHDA	1/7/17	<p>2.HPO-4 Standards &amp; Guidelines, Huning Highland Overlay Zone Development Guidelines, page 86 Demolition, please add to the current language:            ADDITION "Appropriateness - Major, for Demolition (Significant, Contributing, and Non-Contributing Building of 50 yrs. age or older)            Timeliness: from the day of filing the application of Certificate of Appropriateness for demolition with the City, a minimum of 120 day demolition delay will occur to allow due diligence of Landmarks Commissions in determining preservation and economic viability of the property / structure. Subsequent Landmarks hearings may extend the time period if conditions warrant it. A demolition delay is best practice for active historic districts and preservation institutions in the U.S."</p>	<p>This comment refers to page 85 of the Huning Highland Historic Overlay Zone Guidelines. See Line 11.</p>	

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13	Anderson, Bonnie	HHHDA	1/7/17	<p>3. HPO Demolition 14-16-5.5-5.2.a.3.g Certificate of Appropriateness - Major, for Demolition (Significant, Contributing), please add to current language:            ADDITION "Appropriateness - Major, for Demolition (Significant, Contributing, and Non-Contributing Building of 50 yrs. age or older            Timeliness: from the day of filing the application of Certificate of Appropriateness for demolition with the City, a minimum of 120 day demolition delay will occur to allow due diligence of Landmarks Commissions in determining preservation and economic viability of the property / structure. Subsequent Landmarks hearings may extend the time period if conditions warrant it. A demolition delay is best practice for historic districts and preservation institutions in the U.S."</p>	<p style="text-align: center;">See Line 11.</p> <p>Current practice is that all demolition permits within an Historic Overlay Zone are required to have a Certificate of Appropriateness.            Demolition review for Non-Contributing Buildings is conducted by the City Historic Preservation Planner and is approved through what is referred to in the IDO as a Certificate of Appropriateness - Minor. See Section 14-16-5-5.1.A. There is no required review period for a Certificate of Appropriateness - Minor.            Demolition permits for landmark or contributing structure require a Certificate of Appropriateness - Major. See Section 14-16-5-5.2.A. LUCC (referred to in the IDO as LC) reviews these applications and may take up to 90 days for review and public hearings, but there is no provision for an additional demolition delay beyond the LUCC process.            Staff would need direction from decision makers to change the current IDO requirements for demolition review.</p>	<p>On page 333, Section 5-5.1A.1.a.ii, revise text to read "All construction of new structures and new accessory structures."             On page 333, Section 5-5.1A.1.a.iii, revise text to read "All demolition of existing structures and non-contributing accessory structures."</p>
14	McKinley, Banu	ULI NM	1/9/17	<p>Comments in Lines 15-52 are from a report created in Fall 2016 after an IDO Testing Session led by ULI NM on September 13, 2016. The entire report, including a description of the process, can be found within the public comments attachment of the EPC Staff Report.</p>	<p>The project team attended this testing session and was provided copies of the report when it was released prior to submission of the EPC Draft IDO. In revising the Draft IDO for EPC submission, staff addressed many of the concerns raised in this process.</p>	<p>On page 344, Section 5-5.2C.1.c, add a new map of the EDO CPO-1 as an area that is covered by the "Demolition of Non-Designated Structure Outside of HPO" to retain Staff and/or LUCC review of structures over 50 years old.</p>
15	McKinley, Banu	ULI NM	1/9/17	<p>The IDO is an improvement over the existing code both in regulation and in clarity.</p>	<p style="text-align: center;">Noted.</p>	

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16	McKinley, Banu	ULI NM	1/9/17	Groups almost all agreed that it was a lot easier to find what they needed in the new IDO.	Noted.	
17	McKinley, Banu	ULI NM	1/9/17	Users may have a learning curve in trying to understand the new organization and structure. The development standard summary tables are a great start to use in conjunction with the narrative sections, but it is hard to determine where you need to look for other standards and requirements that are not listed in the summary tables.	The new organization will take some getting used to for stakeholders. However, staff feels that this draft document is organized in an intuitive way and contains cross-references to guide the user. The Table of Contents indicates where various standards can be found in the IDO. In the digital version of the IDO, the table of contents and internal cross-references are hyperlinked to allow for more ease of use. More information is needed about how the document could be made easier to navigate.	
18	McKinley, Banu	ULI NM	1/9/17	One participant asked for more cross-references among sections that relate.	See Line 17. Staff has added additional cross-references in the EPC draft. More information is needed about where there should be more <u>cross-references</u> .	
19	McKinley, Banu	ULI NM	1/9/17	The code needs to specify which regulations apply when a corner site has dual corridor designations.	The allowances that come with being in an Urban Center, on a Main Street, within a Premium Transit station area, or in proximity to transit are related to the boundaries of the Center, Corridor, or station area, not to the building orientation or frontage. Staff believes that this comment relates primarily to parking reductions. See Section 14-16-4-5.3.D for an explanation of when parking reductions may apply. For the proximity to transit reduction, and parcel that is within the designated distance of a transit stop or station would be eligible for a parking reduction, regardless of the building's orientation.	

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20	McKinley, Banu	ULI NM	1/9/17	Groups could not find solar requirements.	Solar Access regulations are indicated in the <b>Table of Contents.</b>	
21	McKinley, Banu	ULI NM	1/9/17	Groups could not find the setback chart.	In the current code, setbacks and other dimensional standards are listed separately in each zone district. In the IDO, these standards are consolidated in the Dimensional Standards section. See Section 14-16-4-1 Dimensional Standards.	
22	McKinley, Banu	ULI NM	1/9/17	Several participants asked for clarification on basic definitions; ie. adjacent, abut.	Definitions were added for the terms "adjacent" and "abut" for the EPC draft IDO to <b>address this concern.</b>	
23	McKinley, Banu	ULI NM	1/9/17	One group requested credit for elevated planters and rooftop gardens as usable open space and landscaping.	The definition of "Open Space, Usable" describes what elements may be included in the calculation of usable open space, which may include gardens and plantings. Section 14-16-4-6.3 describes the amount of coverage; types of plantings; soil condition; location, size, and spacing of plant material; etc. for something to be considered landscaped area. Areas that meet this requirement for landscaped area may be counted toward the open space requirement if they meet the requirements for usable open space as well.	On page 405, clarify the definition of "Landscape Area."  On page 412, in the definition of "Open space, usable," add a reference that rooftop decks may be included in usable open space.  On page 232, revise 14-16-4-6.3.B.1, revise second sentence to read " <u>In these areas</u> , landscaping required..."  On pages 232-247, review and revise
24	McKinley, Banu	ULI NM	1/9/17	Landscaping requirements and standards need to be more clear and precise.	Staff has made some revisions to these requirements for clarity and consistency since the Consolidated Draft. More information is needed about where the standards are still unclear.	See Line 23.

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25	McKinley, Banu	ULI NM	1/9/17	It was difficult to understand the differences between open space, landscaping, and drainage, and if they could double count among the different requirements.	Staff feels that the EPC draft of the IDO is appropriately clear on these definitions and where these elements can be counted toward different requirements. The definition of "Open Space, Usable" was revised for the EPC Draft to clarify that required drainage facilities and utility easements cannot be counted toward required usable open space. However, stormwater management features added to the site that meet landscaping requirements count toward landscape area requirements (see Section 14-16-4-6.3.M). See Lines 23 and 24.	See Line 23.
26	McKinley, Banu	ULI NM	1/9/17	The landscaping section was challenging and had large sections that were more philosophical and conceptual with the actual standards buried near the end.	See Lines 23-25.	See Line 23.
27	McKinley, Banu	ULI NM	1/9/17	Parking requirements are difficult to calculate (please add a parking worksheet/calculator).	Noted. A parking worksheet may be created after adoption of the IDO as an administrative form that is available to users who need it.	
28	McKinley, Banu	ULI NM	1/9/17	It is difficult to determine which parking reductions apply.	Section 14-16-4-5.3.D explains that any combination of parking adjustments and credits may be applied to a site depending on the criteria in this section that the site satisfies, as long as the total reduction does not exceed 50%. This has been revised for the EPC Draft IDO. More information is needed about how these regulations could be made more clear.	
29	McKinley, Banu	ULI NM	1/9/17	Parking terms need to be better defined, e.g. 'frontage,' 'directly in front'.	Staff feels that the language describing on-street parking adjustments and credits is clear (see Section 14-16-4-5.3.D.6). More information is needed about how this language could be improved.	On page 216, revise Section 14-16-4-5.3.D.6 and 6.b to refer to on-street parking abutting any lot line instead of on-street parking in front of the subject property.

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30	McKinley, Banu	ULI NM	1/9/17	Parking is restrictive.	Minimum parking requirements have been slightly reduced from the current requirements for most types of development and the IDO updates existing parking reductions. The modifications made to parking requirements and parking reductions are based on national best practices for cities of a similar size. Staff would need direction from decision makers to further reduce parking requirements.	
31	McKinley, Banu	ULI NM	1/9/17	Parking isn't consistent with market demand in auto-oriented areas of the City.	The IDO uses parking <i>minimums</i> to allow development to increase the amount of parking on a site to respond to market demand. Staff would need direction from decision makers to increase parking requirements.	
32	McKinley, Banu	ULI NM	1/9/17	Lenders will not finance projects with too little parking.	See Line 31.	

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33	McKinley, Banu	ULI NM	1/9/17	Shared use parking is unwieldy and old-fashioned. Consider APA's version.	<p>The Shared Parking Table (Table 4-5-1) is a proxy for hours of operation and complementarity based on general land use categories – and that is the direction many cities are going in to simplify administration. We think the matrix in the draft should be kept.</p> <p>The APA matrix, and other shared parking matrices that depend on comparison of hours of operation, are sometimes useful at the initial development stage, but an increasing number of cities don't want to go to that level of detail. Hours of operation for shared uses could be complementary on Day 1, and then down the road tenants change and the city is faced with the choice of (1) re-running the calculator when hours of operation or tenants change (and potentially saying “no, you can't do that because your hours are no longer complementary so there's not enough parking”) or (2) ignoring future changes that make the calculation no longer applicable. Many cities are moving to a version of (2) – namely, they run the calculator when the development/ redevelopment is approved, but don't rerun it when tenants or hours change – relying on the tenant/market to sort that out. So if the city is not going to make the OK/not OK decision based on hours of operation in the future, an increasing number of cities decide they don't need to do that at the beginning.</p>	
34	McKinley, Banu	ULI NM	1/9/17	Further reductions should be allowed for projects receiving tax credits for below market rate housing; this population is shown to have fewer cars.	Staff feels that the reductions provided in the IDO are sufficient. Staff would need direction from decision makers to further reduce parking requirements. See Line 30.	

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35	McKinley, Banu	ULI NM	1/9/17	One group requested greater specificity regarding incentives available along specific corridors. For example, would new apartments on the corner of Montgomery and Wyoming qualify for the density bonuses and parking reductions available to the Montgomery corridor if they face Wyoming?	See Line 19.	Add a section at the beginning of the IDO, with the List of Area-Specific Maps, that indicates where there are special regulations for UC-MS-PT. Include in this section cross-references to the definitions and measurements for these areas.
36	McKinley, Banu	ULI NM	1/9/17	Neighborhood representatives were concerned that the new IDO will be challenging to learn and review.	See Line 17. The Planning Department intends to provide training opportunities for staff, decision-makers, and the public to help stakeholders understand the IDO after adoption.	
37	McKinley, Banu	ULI NM	1/9/17	There were questions about whether the zoning is by right or if there is a still a neighborhood process and what delays / obstructions that could present.	Table 5-1-1 (begins on page 298 of the EPC draft) describes the notification and meeting requirements, as well as the type of review and decision-making authority for various types of development decisions. The table also refers the user to the sections with more detail, including thresholds for when a development proposal requires a public hearing.	
38	McKinley, Banu	ULI NM	1/9/17	In general, groups felt that the IDO allowed for greater density than the current zoning code. This had some exceptions:	See Lines 39-52.	
39	McKinley, Banu	ULI NM	1/9/17	The 4-story MX-M height is not sufficient. It may not allow as much density as current C-2 with angle planes on a large lot and inhibits development and financial potential. A project on a large suburban lot (Montgomery and Wyoming) fared worse under the IDO than current zoning.	The 26' base height in the the existing C-2 zone has been increased to 45' in the MX-M zone. This comment refers to an IDO draft from August 2016. For the EPC draft, staff replaced the angle plane rule, which is confusing for many users, with a rule that height limits do not apply to portions of a building located more than 100 ft. from any lot line in the R-ML, R-MH, MX-M, and MX-H zones to make development standards clearer.	

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40	McKinley, Banu	ULI NM	1/9/17	Existing SU-1 Form-Based Zoning allowed for greater density than the IDO on a site on Tennessee and Central. 55 ft. building height is not sufficient; 60 ft. is better.	<p>Under the current zoning, this site is zoned C-1 and allows 26 ft. in base height plus height allowed within angle planes. This comment is based on the assumption that a zone change to an SU-1 Form-based zone would be approved and allow for higher building heights.</p> <p>Under the proposed IDO, there is not an option to change zoning to a form-based zone on a site-by-site basis. However, for areas in Centers and along Corridors, where development is desired, building heights vary from the current base height limits.</p> <p>Building height limits have been revised for the EPC Draft IDO. For this particular property, the proposed zoning conversion is MX-M on a Main Street and the maximum height would be 65 ft.</p>	
41	McKinley, Banu	ULI NM	1/9/17	It was hard to go high enough with the IDO. Would prefer 5 stories on top of podium (San Mateo and Montgomery).	See Lines 39 and 40.	

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42	McKinley, Banu	ULI NM	1/9/17	One participant expressed concern that the IDO promotes too much retail and multi-family, and this is not appropriate everywhere. This type of development should be targeted only in areas where the market supports it.	The focus of the IDO testing session was to determine whether or not the provisions in the IDO will make development in certain areas possible. Sites for this exercise were chosen to reflect parts of the city where more dense mixed-use development is desirable, and on many of the sites, possible with today's zoning. While the IDO does make this type of development possible in more parts of the city, development will continue to be driven by the market. There is no requirement for first-floor retail or multi-story development in the IDO. See also See Lines 87, 89, 90 108, 186, 189 for comments that indicate the IDO limits retail activity too much.	
43	McKinley, Banu	ULI NM	1/9/17	The IDO does not disallow building signage which is good; however, do all illuminated signs require a permit?	See Section 14-16-4-11.6.B. New illuminated signs will require a sign permit. This is consistent with the provisions of the current zoning code.	
44	McKinley, Banu	ULI NM	1/9/17	Groups appreciated that the IDO makes it explicitly clear how to increase density without resulting in adverse impacts, e.g. rules for development adjacent to single-family residences or Areas of Consistency.	Noted. See Section 14-16-4-8 Neighborhood Edges.	
45	McKinley, Banu	ULI NM	1/9/17	Neighborhood representatives expressed concern that straight zones will not offer as much protection as the existing code, SU-2 and overlay zones.	The intent of the IDO is to carry over the existing, adopted protections in the existing, SU-2, and overlay zones. More information is needed about what protections are missing in the current draft.	

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46	McKinley, Banu	ULI NM	1/9/17	Neighborhoods believe SU-1 is successful to preserve natural features, Bosque, and ecological systems.	<p>Additional regulations were added to the IDO based on public comment for development abutting Major Public Open Space, sensitive lands, arroyos, and acequias. See Sections 4-2.3 (Avoidance of Sensitive Lands), 4-2.5 (Arroyo Standards), 4-2.6 (Acequia Standards), and 4-2.8 (Properties Along Major Public Open Space).</p> <p>The approach in the IDO is to establish regulations that provide adequate protections for natural features, the Bosque, and other ecologically important areas up front, rather than needing to be negotiated on a case-by-case basis. Most cities do not impose extra review and approval procedures in these cases. Upfront requirements implement protections and context-sensitive site design needed in these areas without an additional review and approval process. If additional controls on these development sites is desired, they should be implemented through substantive changes to Chapter 14-16-4 (Development Standards) or – if they related to uses of land – to Chapter 14-16-3 (Use Regulations) rather than through additional/different review procedures. Direction is needed from decision-makers if rezoning to NR-SU zones, which would require EPC review and decision, would provide better protection on these properties.</p>	

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47	McKinley, Banu	ULI NM	1/9/17	Neighborhood representatives explained that residents are concerned with density because they fear parking spill-over impacts in areas that don't have transit access or if they don't get the expected ridership. Therefore, parking expectations need to be realistic or they won't work.	See Line 31 for market demands for on-site parking. Businesses and developers may provide additional parking to serve their market. Staff feels that IDO parking requirements are sufficient. Parking requirements have generally been reduced in order to provide an incentive for development within Centers and Corridors, where development is desired.	
48	McKinley, Banu	ULI NM	1/9/17	Lot sizes are problematic. In particular, large lots were difficult to do a financially feasible concept due to a perceived lack of market demand and inability to achieve market rents in specific areas.	The IDO regulates site design and building and does not require minimum lot coverage, floor-area ratios, or building height. Phasing development on large sites is often appropriate on large sites. The IDO cannot create market demand for development. The IDO does not create or change parcel boundaries. Since the testing session, minimum lot sizes in many of the zones have been removed.	
49	McKinley, Banu	ULI NM	1/9/17	Height allowances and dwelling unit setbacks allowed projects to be more viable under the IDO.	Noted.	
50	McKinley, Banu	ULI NM	1/9/17	The new IDO does not require setbacks, which removes a clear barrier to project design.	Noted. See Lines 39 and 44.	
51	McKinley, Banu	ULI NM	1/9/17	Higher transit bonuses are beneficial in the IDO.	Noted. See Section 14-16-4-1 for Dimensional Standards, where Premium Transit station area building height standards are found.	

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52	McKinley, Banu	ULI NM	1/9/17	Some groups did not find the parking requirements or reductions to be an improvement over the existing code and reported that they were still too high. This compromises the potential feasibility of projects, given that more density is allowed under the IDO but the parking requirements were almost the same.	See Lines 30 and 34.	
53	Contreras, Mike		1/11/17	It was a pleasure meeting with all of you yesterday in your office. This site located at 7226 Central Ave. SW, it being on a high traffic corridor, and with the adjacent parcels being zoned MX-H, I believe this parcel needs to have the same designation as well. Any other designation will not work for any of the developers I am currently working with.	<p>The subject site, which is currently SU-1, has been converted to PD and retains site plan control. The SU-1 approval allows uses permissive in O-1, C-1, and C-2. A straight conversion of these uses would go to NR-C West of the River.</p> <p>Regarding the surrounding properties, staff reviewed the zoning conversion and found a mapping error in the IDO Conversion Map. Based on policies to address the jobs-housing balance, C-2 zoning on the West Side is proposed to convert to NR-C unless it is within 660 ft. of a Premium Transit station. Those properties that are within 660 ft. of a PT station would be converted to MX-M. The subject property is more than 660 ft. from the proposed PT station areas on Central, which supports a conversion to NR-C.</p>	Revise the IDO Conversion Map based on decision rules for C-1, C-2, and C-3 to address any possible inconsistencies.

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54	Krause, Carol		1/12/17	First I would like to thank members of the planning department for the tolerance and patience with all of us community members who are trying to work our way through these drafts. Their help and guidance has been immeasurable when it comes to understanding and locating the information in the Drafts that address our areas of concern.	Staff appreciates the public's engagement in the various drafts of the IDO.	
55	Krause, Carol		1/12/17	One area of concern that has yet to be fully diminished is the lack of notification when it comes to variances. According to page 253 of the IDO (#3) table 1-16-5 Administration and Enforcement no notice of variance needs to be sent at all to neighbors or NA regarding variances. In a community such as ours (SBMT), which is notorious for its mismatched use vs zoning, one of the few protections we have is the building code itself when it comes to buildings, setbacks and allowances. For someone else to decide if a variance is ok, which may seem harmless at the desk level, but on site with our close neighbors and narrow streets it becomes detrimental. I find it alarming that no notice needs to be given.	This comment refers to a formatting issue in Table 5-1-1 on page 298 of the EPC Draft. There are two types of variance in this table - Development Standards and Public R-O-W Sidewalk. The "Variance" line contains no information about review procedures because the procedures are listed for the two types of variance. A Variance for Development Standards includes requirements for public notice.	In Table 5-1-1, for "Fence, Wall, or Sign Permit," "Subdivision of Land - Major," and "Variance," remove the lines separating the different columns in the rows to clarify that these are header rows and the relevant content is in the rows below.
56	Krause, Carol		1/12/17	We already have instances of paved lots draining directly onto neighbors property and tall buildings blocking the Right to Sunlight.	This comment refers to an enforcement issue. Staff believed the standards in 14-16-4-4.8 (Stormwater Management) and 4-9 (Solar Access) are sufficient. More information is needed to improve these standards.	

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57	Krause, Carol		1/12/17	While the new Areas of Consistency is going to help with this, it is not a guarantee and to be certain I would very much like to see notification to the neighbors and NA's of Variances.	See Line 55.	See Line 55.
58	Houde, Kristi	Citizens Information Committee of Martinez-town (CICM)	1/17/17	Chapter 14-16-5: Administration and Enforcement, we request you consider expanding the Electronic Mail notification requirement to Recognized Neighborhood Associations (RNAs) to include all Application Types unless Application Type requires a Mailed Notice to the RNA. This expanded notification allows more transparency of proposed development to residents.	Under today's system, notice is not provided for development that does not go to a public meeting or hearing. The vast majority of development does not require public notice or go before a body that takes public comment. Under the IDO, <i>email</i> notice is a new requirement and is required for some administrative decisions, including Site Plans. All development decisions that require a public meeting or hearing require email notification to RNAs that include the subject site. Administrative and Policy Decisions that impact a specific geography also require notification to impacted RNAs. Direction will be needed from decision makers to expand notice requirements.	

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59	Houde, Kristi	CICM	1/17/17	Regarding required Section 5-4.3.A Neighborhood Meeting: we request that you require the applicant have at least one meeting with a Recognized Neighborhood Association located partially or completely within one-quarter (1/4) mile of the proposed project or facility. This request is to allow neighborhoods in "areas of consistency" near proposed new development in "areas of change" an opportunity to uphold good planning, protect the environment, and promote community welfare. Neighborhood residents need information about proposed development close to the RNA boundary to be informed residents.	See Section 14-16-5-4.3.A. For projects that require a neighborhood meeting and are within the boundaries of an RNA, that RNA is the most appropriate to discuss potential impacts and opportunities. Language was added to the EPC Draft IDO that applies to projects that are not within the boundaries of an RNA. For these projects, the applicant will be required to have a meeting with an RNA within 1/4 mile of the property. See Section 14-16-5-4.3.A.	
60	Houde, Kristi	CICM	1/17/17	Current zoning code violations: how will the IDO treat these. Will enforcement or remedies be strengthened in the IDO? Or could violations be grandfathered as permitted use?	Violation of the existing code that also violate the IDO standards will continue to be violations and can be enforced. If the IDO changes a development standard that makes the previous violation legal, then it ceases to be a violation. The IDO provides clearer, more consistent regulations, which allows for better enforcement. If a penalty of the violation has been assessed, it continues. The penalties for violations of the IDO are enumerated in Section 1-1-99 of the City Code. Modifying these penalties is outside of the scope of the ABC-Z project.	In the enacting ordinance fo the IDO, specify that any violation that is cured by this IDO is no longer considered a violation. Any fees or penalties assessed under the pre-existing code may still be assessed.

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61	Houde, Kristi	CICM	1/17/17	<p>Additional site specific concerns (related to the Lovelace facility on Martin Luther King Jr. Blvd are:</p> <ul style="list-style-type: none"> <li>-Unscreened HVAC equipment and generators on the Lovelace Medical Campus</li> <li>-Open standing water storm drainage catch basin installed by Lovelace on City property at the east end of Martineztown Park</li> <li>-Unscreened vents installed on Medical Office building</li> <li>-Globe lighting recently activated on top of rehabbed parking lot adjacent to the Medical Office building.</li> <li>-Another concern is the drainage issue from the east end of Martineztown Park and from the Fruit/High St comer: In 2006 and on 1 August 2014 heavy rainstorms resulted in flooding one of the Villa de San Martin townhouse units (517 Roma NE.)</li> </ul> <p>How does the proposed IDO address these issues? Is there a process to address these concerns?</p>	<p>These are concerns related to an approved site plan. Site plans remain valid after the adoption of the IDO. See Section 14-16-1-10.3. See also Lines 100-103.</p> <p>Some of these concerns may be violations of the approved site plan, and some may need to be addressed at a future date when the site plan is amended or when a new site plan is submitted for the site. Any site features that become nonconformities under the new IDO regulations will need to be addressed when the site plan is amended for expansions of at least 25% of the net square footage or 2,500 square feet, whichever is less. See Section 14-16-5-6 for nonconformities.</p> <p>Violations of an approved site plan will continue to be considered violations. See Section 14-16-1-10.5. See also Section 14-16-5-7 for general code violations.</p>	

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62	Houde, Kristi	CICM	1/17/17	<p>Buffers and setbacks - Identify location of the buffers and set-backs between areas of consistency, areas of change; transit corridors; open space city park; and our elementary school. Specifically:</p> <ul style="list-style-type: none"> <li>-Lomas and adjacent single family residences on cui-de-sacs within South Martineztown;</li> <li>-Broadway and adjacent low density public housing on Arno;</li> <li>-Martin Luther King and adjacent single family homes on Marquette and low-density public housing units on Arno; and</li> <li>-The residential townhomes on High St. adjacent to the Lovelace Medical Campus.</li> </ul>	<p>Staff is developing an interactive map that shows Areas of Change and Consistency. See Section 14-16-4-8 for neighborhood edge provisions that protect single-family neighborhoods. Building heights are found in Section 14-16-4-1, which includes taller building heights for properties within 660 ft. of a Premium Transit Station. There are provisions for screening and fences and walls adjacent to parks and/or Major Public Open Space. See Section 14-16-4-6.8 and 14-16-4-6.9. The IDO does not include and additional buffers or setbacks from City parks. The IDO carries over existing separation requirements between schools and adult uses and alcohol sales. See 14-16-3-3.4.F, G, and DD.</p>	
63	Houde, Kristi	CICM	1/17/17	<p>Allowances - Our experience with Administrative Amendments issued to the Lovelace Medical Campus causes concern that a generic city-wide up to 25% expansion of usage may be detrimental to adjacent residential neighborhoods. Additional lighting, signage, unscreened HVAC, and unscreened venting equipment have negatively affected our residential quality of life. The less than 25% allowance is too generous to avoid public hearings on expanded development city-wide. We request you consider reducing the maximum from less than 25% expansion to 5% expansion for "large" projects to 10% for "smaller" projects. City planning staff should define "huge" and "small" according to accepted standards.</p>	<p>What are currently referred to as "Administrative Amendments" are handled in the IDO under Section 14-16-5-4.24.B. This text will be revised to explain that Minor Amendments to approved Site Plans can be approved for up to 25% or 2,500 S.F., whichever is less, increase in gross floor area as long as the increase does not expand the building beyond the Dimensional Standards for the base zone (see Section 14-16-4-1) or the Administrative Deviations found in Table 4-3-1.</p>	<p>Revise Section 14-16-1-10 for clarity and consistency.</p> <p>Revise Section 14-16-5-4.24 for clarity and consistency.</p>

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64	Houde, Kristi	CICM	1/17/17	<p>Hospital expansion: On January 12, 2016, the Albuquerque Journal reported that Lovelace Health System and UNM Medical Group are forming a new venture to deliver rehabilitation services at the Lovelace Medical Campus and plan to launch a new residency program in physical medicine and rehabilitation on the Lovelace Medical campus.</p> <p>-Is this an example of the less than 25% expansion that would avoid the need for public hearings and Required Neighborhood Meetings?</p> <p>-Does the current St Joseph/Civic Auditorium Sector Plan allow this development/expansion?</p> <p>-Is there enough parking for the additional outpatient services and for additional student parking?</p> <p>-Is City Planning staff involved in this proposed development/expansion?</p> <p>-Neighborhood residents were alerted by the newspaper article to the proposed development/expansion. Did the recent addition of the CVS Pharmacy to the Medical Office Building increase the parking requirements on the site?</p>	<p>Staff believes that this expansion of services involved the rehabilitation of existing buildings on the site, not an expansion of the building itself. If there is no change of the site itself, such projects are handled through a building permit for tenant improvements, not an amendment to the site plan. In these situations, neighborhood notice and hearings are not required and only the Building Permit Office of the Planning Department would be involved. In this case, a parking review would only be triggered if the property owner were requesting a change of use - i.e. from commercial to residential or vice versa. Providing additional medical-related services within a hospital facility is not considered a change of use.</p> <p>The same is true for the addition of a pharmacy within the existing building.</p>	

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65	Houde, Kristi	CICM	1/17/17	Administrative Amendments permitting additional uses on St Joseph/Civic Auditorium SDP have had a deleterious effect on our neighborhood quality of life. Permitting additional ambulatory services, a retail pharmacy and a helipad increased noise, air pollution, traffic access and congestion. These now permitted uses increase visual pollution of light at night emitting from enlarged windows, and visual pollution from unscreened venting on the Medical Office Building. As an aside, what's being vented into the neighborhood? Lovelace Hospital still has not complied with their 1998 agreement to vacate Walter St (see attached). Continued noncompliance and additional ambulatory services with retail pharmacy usage worsen traffic access and congestion issues with Longfellow Elementary School on Walter St that spill over into the residential neighborhood.	Noted. See Lines 60-62.	
66	Houde, Kristi	CICM	1/17/17	The current St Joseph/Civic Auditorium SDP as amended is now a patchwork of permitted uses. Will a Facility/ Redevelopment Plan address this SU-1 area to review and upgrade standards to ensure minimal impact on our residential quality? Or would a Community Planning Area Assessment address this large site in the proposed IDO?	The Site Plan for the St. Joseph site determines what development and uses can take place on the site. The approved Site Plan will remain valid after the IDO is adopted. See Line 61. The Community Planning Area assessment may provide an opportunity for residents, Planning staff, and property owners to address issues like this in the future.	

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67	Houde, Kristi	CICM	1/17/17	<p>Martineztown Park-</p> <p>-What is the buffer or a set-back allowance from the SU-1 boundary to the adjacent Martineztown Park?</p> <p>-Will the IDO permit high-rise development to be built along the park without a set-back or buffer?</p> <p>-Does the IDO require visual screening between the Lovelace Medical campus valet parking lot and the east end of Martineztown Park?</p> <p>-Currently, no screening exists; the fencing is open iron work with no landscaping. Is the absence of screening/buffering a current zoning code violation?</p>	<p>See Lines 61 and 62.</p> <p>Under the IDO conversion map as of December 2016, the Lovelace Campus parcels are shown as MX-M. After further review, staff realized the existing C-2 zone (of which MX-M is the straight conversion) does not allow hospitals. Staff will be revising the conversion for existing hospital sites to MX-H, the conversion of C-3 zones, which would allow for buildings up to 55 ft. For future development, Edge Buffer Landscaping is required adjacent to the Park and the abutting R-T properties, see page 244, Section 4-6.5E. For future development, Parking Lot Edges provisions require screening of parking areas, see page 246, Section 4-6.6A. For future development, Neighborhood Edges protections are required for portions of the site that abut the R-T properties, see page 261, Section 14-16-4-8.</p> <p>These provisions would apply with a building expansion of 2,500 SF.</p>	<p>Revise conversion map to zone existing hospital sites (predominantly SU-1 for hospital) as MX-H.</p>
68	Houde, Kristi	CICM	1/17/17	<p>Ugly Billboards -Billboards should be eliminated along Lomas from Railroad tracks to top of hill just east of I-25 northbound frontage road and along the I-25 Frontage roads to protect historic downtown views.</p>	<p>We are generally carrying over existing standards for signs rather than changing entitlements. Minor changes to temporary signs have been made to comply with a recent Supreme Court decision Reed v. Gilbert. Prohibiting off-premises signs in new areas is outside the scope of the ABC-Z project.</p>	

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69	Griffie, Jim	Nor Este NA (NENA)	1/17/17	The Nor Este Neighborhood Association (NENA) would like to express our thanks for meeting with us on 1/13/2017 to go over the IDO and Zone Conversion Map issues we had identified within the Association's boundaries. The meeting was very informative and professional and did indeed address our most important concerns. The following are a few remaining comments/concerns that we wanted to pass along for your consideration.	Staff appreciates the public's engagement in the various drafts of the IDO.	
70	Griffie, Jim	NENA	1/17/17	The current conversion map shows all parcels in Nor Este Estates (Wyoming to Barstow, Modesto to Alameda) zoned R-1B. We believe most of the parcels along both sides of the La Cueva Channel and then North to Modesto are at or more than the 7000 sqft minimum size for R-1C but not all satisfy the 10' minimum side lot setback requirements for R1-C. Since the Nor Este Estates if fully developed and there is no distinction in terms of land uses between R-1B and R-1C there is no real concern but it does tend to distort the housing density and housing density gradient "picture" in the area.	As the commenter notes, uses for R-1 are the same. Contextual standards in Section 4-1.3.B are intended to ensure consistency at the street edge for redevelopment in the future. Staff will review the R-1 conversions in this area to verify that the correct sub-types were used.	
71	Griffie, Jim	NENA	1/17/17	There is a zoning error in the existing zoning map for the parcels at the South East corner of Barstow and Modesto. The density in this development is probably 5DU/A, not 3DU/A as shown on the existing zoning map and therefore probably should be R-1C rather than R-1D as shown on the IDO map.	The flavors of R-1 are based on lot size, not density. The IDO zone conversions are based on existing zoning and entitlements. While this area may have developed as higher density than it was zoned for, the conversion is based on the zoning, not the current development. See Line 70.	

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72	Griffie, Jim	NENA	1/17/17	Assuming the zone conversion map is adopted at the same time as the IDO, it would seem advisable to have a streamlined process (something other than the normal zone change request process) for correcting conversion errors for some period of time after the adoption.	See Line 4.	
73	Griffie, Jim	NENA	1/17/17	We also hope the pre-adoption zoning/land use data is maintained in ABQ Maps (AGIS) for a period time (possibly years) after the new zoning map is adopted.	The current zoning will be maintained by AGIS during the transition period to the IDO zoning. After that, a record of the current zoning will be kept in the City's records.	
74	Griffie, Jim	NENA	1/17/17	We recommend that the records that document the transition from the current zoning ordinance to the IDO are retained and kept available to the public for quite some time, possibly even as recorded public records. Examples include the final draft of the IDO with all of its foot notes, staff responses to public comments, and policy tracking matrices.	Staff intends to maintain all drafts of the IDO as public record and will be available for the public to review in the future.	

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75	Griffie, Jim	NENA	1/17/17	<p>The residential development unit densities identified in the La Cueva SDP that are explicitly identified in the current zoning (i.e. R-D xDU/A) are being replaced by the minimum lot area requirement of R-1A through D in the IDO. Our calculations (see following) find that this approach does not yield an exact match and seems to move toward slightly higher densities. We believe the IDO should explicitly address this aspect of the conversion.</p> <p>R-1B 5,000sqft min = .11 net acre or 9DU/net acre (~8DU/gross acre) The Conversion Map is using R-1B for 7DU/A</p> <p>R-1C 7,000sqft min = .16 net acre or 6DU/net acre (~5DU/gross acre) The Conversion Map is using R-1C for 5DU/A</p> <p>R-1D 10,000sqft min =.23 net acre or 4DU/net acre (~3DU/gross acre) The Conversion Map is using R-1D for 3 and 4DU/A</p>	See Lines 70 and 71.	
76	Griffie, Jim	NENA	1/17/17	<p>14-6-3-3.6.J Accessory Uses: Home Occupation has expanded the scope of what is considered "Home Occupation" from that of the current code with a potential residential neighborhood impacts. Of particular note is the number of Non Resident Family Employees. In the current code, only Resident Family members can be employees while the IDO permits up to 2 non-family member employees. This would seem to muddy the distinction between Home Occupation and Live-Work.</p>	<p>The IDO adds a provision for home occupation that limits the number of individuals that can simultaneously be attracted to the residence, which does not exist in the current Zoning Code, and which serves to limit the amount of traffic - including both employees and patrons - created by the home occupation.</p>	<p>On page 156, Section 14-16-3-3.6.J.2, revert the language to the current code "Only members of the residing family may be employed."</p> <p>On page 157, Section 14-16-3-3.6.J.8, reduce the number of individuals that can be regularly attracted to the premises to two instead of four.</p>

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77	Griffie, Jim	NENA	1/17/17	There are numerous references to 14-16-4-11 Operation and Maintenance in the current draft that are incorrect. 14-16-4-12 is the current section number for Operation and Maintenance.		Search entire document for references to Operation and Maintenance and fix incorrect cross-references.
78	Massey, John P.		1/17/17	I commend the work of the City Council and the City Planning Department. I am hopeful that their efforts, and yours, will significantly advance the turnaround of the economic difficulties in Albuquerque.	Noted.	
79	Massey, John P.		1/17/17	Because I have lived and worked in the Nob Hill area over a course of decades, I have closely followed and on multiple occasions provided written and verbal comments to City officials on the ABC-Z zoning code recompilation. My significant research on professional articles dealing with zoning and bus rapid transit systems convinces me that the City's work on this zoning matter will provide a great public benefit consistent with the guiding public policies of improving mobility, economic vitality, equity in housing and transportation, all in a sustainable and economically feasible manner.	Noted	

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80	Massey, John P.		1/17/17	The interplay between zoning changes and the construction of the Albuquerque Rapid Transit (ART) is quite heartening. ART is designed to be more than a transportation upgrade. ART will be a much needed economic boon due to the multipliers that will directly accompany this public construction project and those that will accompany the associated increased private construction and commercial activities. (The DOT and Fed Reserve studies of other such systems referenced in ART literature are appropriately encouraging on this public-private economic relationship.)	Noted	
81	Massey, John P.		1/17/17	To facilitate economic, transportation and environmental component success, the ABC-Z Consolidated Plan of December 2016 largely encourages the private developments that must accompany ART. The increased uses allowed in the MX- zones will set the stage for additional commercial, business and multi-residential construction. The realization of these opportunities, however, requires density. If you don't have the population to support the businesses, the businesses won't come. If the businesses don't come you won't have the much desired "walkability" of our affected neighborhood.	Staff believes that the "Consolidated Plan" refers to the EPC draft IDO. Agreed. The market is an important driver in determining what development will take place. While the IDO allows some additional building height, density, and uses in Mixed-use zone districts, a market for these things is necessary for the development to happen.	

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82	Massey, John P.		1/17/17	<p>This brings me to my current suggestion on how to improve the Consolidated Plan with respect to Nob Hill's potential density increase. The area east of Carlisle to Washington has much open or delapidated existing spaces. This area appears ideal for greater residential and commercial density. The Nob Hill Character Protection Overlay unnecessarily inhibits that density opportunity in that area. Accordingly, I recommend the application of the CPO be limited to the area between Girard and Carlisle. If the CPO boundaries cannot be reduced then please allow the height bonuses available elsewhere in Main Street and Premium Transit corridor designations to be applied throughout the Nob Hill area, from Girard to Washington. If that is too extensive then allow the bonuses to be applied at least to the developments between Carlisle and Washington.</p>	<p>Staff believes that the "Consolidated Plan" refers to the EPC draft IDO. Staff has attempted to balance the regulations in the current Nob Hill Highland SDP with a desire to support development in Centers and along Corridors. Despite the importance of the Nob Hill area as a Main Street as well as its Premium Transit stations, there has been neighborhood opposition to increasing building heights in the area between Girard and Aliso (just East of Carlisle). East of Aliso to Graceland, Premium Transit station area height standards do apply - as does the Workforce Housing incentive - allowing for additional building heights in this area. Staff feels that the proposed zoning regulations and the provisions of the Nob Hill Highland - CPO-5 strike a balance between the Centers &amp; Corridors vision and the desires of the surrounding residents.</p> <p>Staff would need guidance from decision-makers to allow higher building heights in the Nob Hill Highland CPO-5.</p> <p>See Lines 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.</p>	

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83	Massey, John P.		1/17/17	There is a practical and legitimate need to permit developers a reasonable return on their capital and their experience. My concern is that without the associated bonuses available elsewhere under the new plan, the private construction activity in the Nob Hill area will be restricted. Contributing projects may not be undertaken. That would imperil the realistic vision and potential success of both ART and this much needed zoning overhaul.	See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	
84	Jaramillo, Jaime	Consensus Planning	1/17/17	First and foremost, thank you for such a strong December draft! We believe that most of the issues we raised throughout this process were addressed in the December draft.	Staff appreciates the public input that has led to this EPC Draft of the IDO.	
85	Jaramillo, Jaime	Consensus Planning	1/17/17	With that said, there are several items we still believe should be addressed. Now that the IDO draft is under EPC consideration, we understand that each comment we submit will be addressed and if not addressed in the draft with a change, an explanation will be provided as to why it is not recommended for a change. The following list addresses the issues we have identified in the December draft:	See Lines 86-90.	

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86	Jaramillo, Jaime	Consensus Planning	1/17/17	Master Development Plans (e.g. Balloon Fiesta Master Development Plan) – Section 14-16-1-10.3 states that Master Plans are listed in Section 14-16-2-5.2, which they are not. Section 14-16-1-10.3 also states that Master Plans are subject to Section 14-16-5-4.23 (Expiration of Approvals), which Master Plans are not found in the table of approvals and expirations.	Staff determined that it is not appropriate to list approved Master Plans within the IDO as this list is likely to change over time. The new reference in Section 14-16-2-5.2.C.2 states that a list of approved Master Plans is available from the Planning Department. This practice will allow interested parties to receive an up-to-date list of approved Master Plans at any time.	On page 4, Section 14-16-1-10.3, remove the reference to the list of Master Plans in Section 14-16-2-5.2.
87	Jaramillo, Jaime	Consensus Planning	1/17/17	Restaurants are currently an accessory use in the O-1 zone. This use was this not carried over into the MX-T (O-1 conversion) zone, please revise.	The MX-T zone is intended to create a buffer between residential neighborhoods and more intense commercial areas and is not intended to include auto-oriented commercial uses. Restaurants tend to attract more traffic than other small-scale offices, which may spillover into nearby residential neighborhoods. Additionally, the IDO does not distinguish between restaurants that serve liquor and those that do not; therefore, staff believes that opening up this zone to include liquor sales would be inappropriate. For these reasons, staff has determined that it is not appropriate to include restaurants as permissive uses in the MX-T zone district. Staff would need direction from decision-makers to change this use. See Line 186.	

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88	Jaramillo, Jaime	Consensus Planning	1/17/17	<p>“Storage of household goods, office records, equipment or material reasonable to neighborhood function” is a current conditional use classification in the C-1 zone. The IDO renamed this use “Self-storage” and it is no longer allowed at all (not even conditionally) in the MX-L (C-1 conversion). With the existing popularity and market potential in Albuquerque for storage, this use should be added back to the MX-L zone as a conditional use.</p> <p>Additionally, the proposed use specific standard for self-storage (3-3.4.X.1.) severely restricts storage in the MX-M and MX-H zones, which is a large change from the existing C-2/C-3 storage use standards and should be removed.</p>	See line 187.	<p>On page 111, in Table 3-2-1, add a C in the MX-L Column for "Self-Storage."</p> <p>On page 136, in Section 14-16-3-3.4.X.1, add "MX-L" before "MX-M"</p>
89	Jaramillo, Jaime	Consensus Planning	1/17/17	<p>Retail uses allowed in the C-2 and C-3 conversions to MX-M and MX-H were changed significantly. This is a significant taking of the existing C-2 and C-3 property rights. We continue to request removal of this arbitrary restriction. As a compromise, we suggest modifying the threshold from 50,000 to 75,000 SF to match the current Large Retail Facility definition and making over 75,000 SF retail a conditional use.</p>	<p>The IDO is a legislative action to completely replace the City's zones with new ones. In this process, individual uses may be gained or lost in particular zones, but the project team is proposing zone conversions that match as closely as possible the bundle of permissive uses in the existing zones. In the IDO, MX-H is envisioned to be a more urban, mixed-use zone, which prioritizes pedestrian mobility and walkable environments. See Lines 110-112 for more discussion of changes to retail uses. The IDO proposes zones with a range of intensities and uses that are compatible in each. Direction would be needed from decision-makers to adjust the thresholds for small, medium, and large retail and in which zones each is appropriate.</p>	

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90	Jaramillo, Jaime	Consensus Planning	1/17/17	Also in the C-3 conversion to MX-H, the provision of a drive through facility changed from permissive in C-3 to conditional if vacant for five or more years in MX-H. This is an issue which should be resolved for all C-3 to MX-H conversions city-wide.	In the IDO, MX-H is envisioned to be a more urban, mixed-use zone, which prioritizes pedestrian mobility and walkable environments.  The C-3 zone is being converted to NR-C outside of Center and Corridor areas. Drive-throughs are permitted as Accessory uses in the NR-C zone district. See also Lines 90 and 191.	
91	Davis, Kalvin	Geltmore, LLC.	1/17/17	We support the City's extensive effort in updating the zoning code through the Integrated Development Ordinance (IDO) and their combined effort with the County in completing the revised Comprehensive Plan.	Noted.	
92	Davis, Kalvin	Geltmore, LLC.	1/17/17	The City has taken great measures to simplify the rules and regulations that protect existing neighborhoods, while also accommodating much needed new development and redevelopment. The move from a convoluted system of overlapping and confusing Sector Plans to an integrated model, in which all the rules and regulations are contained within a single document, will allow the Planning Department to administer their duties more fairly and perform more efficiently when reviewing proposed new development projects.	Noted.	

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93	Davis, Calvin	Geltmore, LLC.	1/17/17	<p>In addition to increased fairness and efficiency, the new integration of the IDO zoning with the goals and policies outlined in the Comprehensive Plan related to land use regulations, transportation, housing, and jobs will connect them in a thoughtful manner, with an eye towards accommodating future growth. The combination of mixed-use zoning categories with height bonuses made available to properties in appropriate locations, like near Premium Transit, Urban Centers, Main Streets, and Downtown, represents the best in current techniques of land use, transportation, and housing planning. The most thoughtful bonus criteria, which best aligns the goals and policies of the Comprehensive Plan with the zoning and supports the future growth of the City, is the Premium Transit bonus.</p>	Noted.	

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94	Davis, Calvin	Geltmore, LLC.	1/17/17	<p>New mixed-use residential/commercial projects in the applicable bonus areas will create much needed housing near to jobs and transportation. Those individuals that live, work, and play in these new mixed-use development areas will be able to reduce their vehicle miles traveled and help to not only normalize the City's jobs/housing balance but to keep our skies blue and our air clean. We believe that mixed-use projects that create new housing and commercial space near Premium Transit, Urban Centers, Main Streets, and Downtown will be of a great benefit to the City as noted in the study done by the Center for Neighborhood Technologies. We support the City's effort to encourage these types of projects and we believe that the more quality housing that can be added to these areas the better.</p>	Noted.	

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95	Davis, Calvin	Geltmore, LLC.	1/17/17	<p>We recognize the benefit of development height bonuses, and having recognized that, we do not believe that development height bonuses should be limited in any mixed-use zoned areas. We noticed that the Nob Hill CPO section on building standards and building heights [section 2-7.2(5)(d)(i)(b)] has limited the ability of properties to qualify for development height bonuses. We believe that limiting development height bonuses in areas where they should be applicable is contrary to goals and policies outlined in the Comp Plan. The Planning Department, the EPC Commissioners, and the City Councilors should act to modify this section of the Nob Hill CPO. <i>The Premium Transit bonus should be applied normally within the Nob Hill CPO (i.e. within 660 feet of a station) instead of the vague "within one block" as it is currently written.</i> At the minimum, the Premium Transit bonus should be applied normally between Carlisle and Washington while retaining the "within one block" language for the area between Girard and Carlisle. Also, note that no other area along a Premium Transit corridor will experience a restriction of the Premium Transit bonus.</p>	<p>Noted. It is important to note that the Nob Hill SDP currently limits building height to 39 feet between Girard and Aliso and 59 feet between Aliso and Graceland. The IDO does not change the existing height entitlements significantly up or down. The additional height associated with supporting transit-oriented development is proposed to only apply to the blocks immediately adjacent to the station areas in order to protect the historic character of lower Nob Hill. The draft represents an intent to balance existing entitlements with new policies to support transit-oriented development. Staff would need direction from decision-makers to adjust the Nob Hill Highland CPO-5. See Lines 82, 96-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.</p>	

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96	Davis, Kalvin	Geltmore, LLC.	1/17/17	This map [see comment letter for graphic] was created using the boundary outlined in the Nob Hill CPO. It shows those properties between Carlisle and Washington impacted by the restriction of the Premium Transit bonus. The thick red outline shows properties that are located within the Nob Hill CPO and within 660 feet of a new Premium Transit station. The thinner red outline filled with red hatch marks shows properties that are located "within one block" of a new Premium Transit station.	See Lines 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	
97	Davis, Kalvin	Geltmore, LLC.	1/17/17	There is a net negative impact to transit oriented development in the City by restricting the Premium Transit bonus. The negative impact is significant as it impacts eight city blocks that have frontage on Central which are within short walking distance of a Premium Transit station. This restriction has the potential to redirect several hundred million dollars in new mixed-use investments into other areas and halt the creation of new multifamily units in those blocks that are within 660 feet of a Premium Transit station but not "within one block." Also, this area is covered by a Metropolitan Redevelopment Area, so new investment should be encouraged here and not restricted more than other areas along the Premium Transit corridor. Restricting the Premium Transit bonus in this area does not represent good land use, transportation, or housing planning and is contrary to many goals and policies outlined in the Comp Plan.	See Lines 95-96, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill. The Central/Highland/Upper Nob Hill MR area extends along Central Ave. between San Mateo and Carlisle. MR Plans are standalone documents that do not contain zoning. The redevelopment tools contained in the MR Plan for this area will continue to be available after the IDO is adopted to encourage development proposals that support the intent of that plan. Staff would need direction from decision-makers to adjust the Nob Hill Highland CPO-5.	

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98	Murphy, Kim		1/17/17	Thank you for the opportunity to comment on the latest draft of the Integrated Development Ordinance (IDO). Many of my earlier comments on the previous draft (November 14, 2016 Memo) have been addressed, for which I am very appreciative. I continue to be very supportive of the IDO project overall, but have some additional questions and comments set forth in this memo.	Staff appreciates the public input that has led to this EPC Draft of the IDO.	
99	Murphy, Kim		1/17/17	Section 1-10.1 (page 4) First sentence deals with timing of applications prior to the Effective Date of the IDO. The second sentence is confusing in that it addresses amendments and changes to applications, but references Subsection 5-4.24 which deals with minor and major amendments to "permits, approvals or plans." Obviously, these are two different things.	Noted.	See Line 63.
100	Murphy, Kim		1/17/17	Section 1-10.3 (page 4) This subsection states (in part): "Any permit or development.. prior to the Effective Date.. shall remain valid." What is meant by "valid" should be clarified. I'm assuming that with respect to use, "valid" means either conditional or nonconforming, if not permitted.	Correct. With respect to uses, any approved use based on current zoning would be allowed to continue after the adoption of the IDO. If there is a use that is currently permitted by the zoning code, but becomes conditional in the IDO, then that use will be considered an approved conditional use and will not need additional conditional approvals. See Section 14-16-3-1.4. A use that is permitted by the current zoning code but not permitted under the IDO would become a nonconforming use and would be regulated by Section 14-16-5-6. See also Line 116 for period of validity.	See Line 63.

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101	Murphy, Kim		1/17/17	Section 1-10.3 (page 4) However, the meaning of "valid" with respect to development standards for permits and development approvals prior to IDO is less clear. Is the intent that they become nonconforming and therefore subject to Section 5-6 and Subsection 5-5.2D? Please clarify.	<p>A permit or development approval may identify uses and/or site design elements, and will be considered valid if approved prior to the effective date of the IDO. "Valid" means that the uses and buildings on the site are considered legal as long as they do not change to something that was not approved (i.e. a different use or expansion of the building or site features).</p> <p>Just as in today's zoning system, if the property owner wants to change the site, they can request an amendment to the site plan. Minor Amendments can be approved administratively based on the criteria in Section 14-16-5-4.24.B, to be revised for clarity based on public comment. Changes to the site that go beyond the criteria in Section 5-4.24.B would be considered Major Amendments and would be handled by the decision-making body that issued the permit or approval, as described in Section 14-16-5-4.24.C). See also Line 63.</p>	<p>See Line 63. The revised language in Section 1-10 will clarify how approvals will be handled.</p> <p>Clerical: On Page 346, fix Section references in Section 14-16-5-5.2.D.1 (Nonconformities and Definitions references are incorrect).</p>
102	Murphy, Kim		1/17/17	Section 1-10.3 (page 4) Are there any instances when an inconsistency of prior approved development standards with IDO development standards would become an Approved Variance (new term used herein)?	<p>If there is an approved site plan for the site, it remains valid. See Lines 63 and 101. Minor amendments can be made to the approved site plan per Section 14-16-5-4.24.B.</p> <p>For the purposes of future amendments, approved buildings or developments that do not meet the Development Standards in the IDO would be considered nonconforming after the adoption of the IDO. See Section 5-6 for Nonconformities.</p>	<p>See Line 63. The revised language in Section 1-10 will clarify how approvals will be handled.</p>

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103	Murphy, Kim		1/17/17	Section 1-10.3 (page 4) Also, with respect to amendments to prior development approvals, does this subsection mean that minor amendments to development approvals prior to IDO are processed in compliance with the requirements of the <u>original approval</u> ? And major amendments are processed in compliance with the IDO?	Minor and major amendments will need to comply with the IDO. For site plans with elements that become nonconforming once the IDO is adopted, see the Nonconformities Section 5-6 for how amendments will be handled and limits on expansions. See also Line 102.	See Line 63. The revised language in Sections 1-10.1 and 1-10.3 will clarify how approvals will be handled.
104	Murphy, Kim		1/17/17	Section 1-10.3 (page 4) Also, if a <u>use</u> was previously permitted, but now conditional under the IDO, then use would be "Approved Conditional" pursuant to Section 3-1.4 (page 103). Correct?	This is correct. See Line 100.	
105	Murphy, Kim		1/17/17	Section 1-10.3 (page 4) What's the rationale for the specific reference to Master Plans listed in NR-BP? Is there linkage to the Comp Plan, which refers to City Master Plans (Table A-3, Appendix C and Master Development Plans (Appendix H). Should not this provision apply to all approved "Master Plans", including Site Plans for Subdivision aka Master Development Plans?	See Line 86. See the Definition for Master Plan in Section 14-16-6-1. What the IDO considers a "Master Plan" could include what are currently referred to as "Site Development Plans for Subdivision" or "Master Development Plans." Some Site Development Plans for Subdivisions may be considered Site Plans under the IDO. This language has been simplified to reduce confusion created by the use of a variety of terms in the past. In either case, approvals in place before the effective date of the IDO remain valid. See Lines 9, 61, 100-102, and 107.	See Line 86.  AGIS currently uses the term "Master Development Plan" to refer to what the IDO currently calls "Master Plans" in the EPC draft. The IDO will be revised throughout to refer to Master Development Plans for private development vs. Master Plans for City-owned facilities.
106	Murphy, Kim		1/17/17	Section 2-5.2 (page 44) Can Planning Department provide a current list of approved Master Plans?	The list that is current as of December 2016 can be found in Table A-3 in Appendix C of the December Council Greenline Draft of the Comp Plan.	Clerical: On page 44, Section 14-16-2-5.2.C.2, replace the ":" at the end of the sentence with a "."

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107	Murphy, Kim		1/17/17	<p>Section 3-1.4 (page 103) This subsection deals primarily with use and secondarily, by implication, with development standards related to "continue(d) operation." as well as expansion of use.</p> <p>-Is it correct to assume that Approved Conditional encompasses both use and development standards? The statement "continue operations in structures" seems to suggest so. If not, do they become nonconforming with respect to development standards? Or alternatively, should they become Approved Variances (new term used herein)?</p> <p>-How does this situation dovetail with Subsection 1-10.3 (page 4)? Seems like there is overlap.</p>	<p>If a site is deemed to have a Conditional Use Approval per Section 14-16-3-1.4, the use may continue within the structures and land areas where it was conducted prior to the effective date of the IDO. Part (b) of this section says that the use can be expanded, which means that other uses that are allowed in the zone could be added to the site, provided that they conform to and Use Specific Standards. This means that the structure is legal under the IDO.</p> <p>However, future expansions will need to comply with the development standards of the IDO for the zone district.</p> <p>If there is an approved site plan for the property, then the site plan would remain valid based on section 14-16-1-10.3. See Lines 86 and 101-103 and 110-112.</p>	

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108	Murphy, Kim		1/17/17	Table 3-2-1 (Permitted Use Table) MX-L Zone: Seems reasonable to include Personal and business services, large (page 111) and General retail, medium (page 113) as "conditional" uses.	<p>The size distinctions for Personal and business service and General retail uses were added in the IDO to ensure that the scale of development is consistent with the context and purpose of the zone district. Using the size of establishments as a proxy for the intensity of off-site impacts is a more modern and effective way to regulate uses than our current system of regulating the type of products or services provided.</p> <p>The MX-L zone district is intended to provide for neighborhood-scale retail and services. Within this zone, General retail and Personal and business services are limited to small establishments under 10,000 sq. ft. to achieve this purpose. Staff would need direction from decision-makers to allow for larger General retail or Personal and business services in the MX-L zone.</p>	
109	Murphy, Kim		1/17/17	Table 3-2-1 (Permitted Use Table) MX-M Zone: Seems reasonable to include Hospital (page 107) as a "conditional" use.	<p>The MX-M zone district is based on the current C-2 zone, which does not allow hospitals. Direction would be needed from decision-makers to add hospitals as a Conditional use in MX-M.</p>	See Line 67.

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110	Murphy, Kim		1/17/17	Table 3-2-1 (Permitted Use Table) MX-M Zone: General retail, large is a "conditional" use. Many of the existing large format retail properties (Costco, Wal-Mart, & Target) are programmed to be zoned MX-M under the IDO (based on NE ABQ only), and would continue as Approved Conditional under Section 3-1.4. Would they however become "nonconforming" as to structures, signs and site features under Section 5-6?	See Lines 101 and 107. For future changes to the site, if the structure or site features do not meet the standards of the IDO, then the structure and/or site features become nonconforming and would need to follow Section 14-16-5-6. A zone change would be required if the use were to expand or other site development features need to change.	
111	Murphy, Kim		1/17/17	Table 3-2-1 (Permitted Use Table) All MX & NR Zones: With respect to General retail (page 113), I would suggest increasing the square foot parameters somewhat to better align with market realities as follows: -General retail, small <15,000 sf (allows drug & hardware anchors) -General retail, medium 15,000-65,000 sf (Allows hobby, sports, home, and fashion anchors) -80,000 sf (Grocery) -General retail, large >65,000 sf >80,000 sf (Grocery)	See Line 89. Ranges provided in the IDO were based on Clarion recommendations. Direction would be needed from decision-makers to adjust the ranges in the IDO.	
112	Murphy, Kim		1/17/17	Table 3-2-1 (Permitted Use Table) All MX Zones: Building and home improvement, large (>50,000 sf) is neither a permitted or conditional use. Several existing Home Depot and Lowes properties will be zoned MX under the IDO. I assume that they would become Approved Conditional under Section 3-1.4, but perhaps "nonconforming" as to structures, signs and site features. Please clarify?	See Lines 101, 107, and 110.	

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113	Murphy, Kim		1/17/17	Section 3-3.1 (page 120) Subsection C states that prior approved uses and plans "remain valid." See comments on Subsection 1-10.3 above.	See Lines 100-103.	
114	Murphy, Kim		1/17/17	Table 4-5.1 (Off-street Parking Requirements) General retail (page 209) establishes a maximum 4 spaces per 1,000 GFA for structures larger than 100,000 GFA. I believe that many large format retailers commonly use 4.5 space per 1,000 GFA.	The maximum is intended to result in less parking than a typical retailer might provide in order to reflect the non-auto dominant policy for UC-MS-PT environments.	On pages 209 and 210, revise the standards for maximum parking for office and retail to only apply to UC-MS-PT areas.
115	Murphy, Kim		1/17/17	Section 4-8 (Neighborhood Edges) It would appear that 4-8.3 relating to building "stepdowns" would apply to properties that are "adjacent" as defined on page 382, which includes properties separated by a public street. While 4-8.5 dealing with buffering applies only to properties that "abut", also defined on page 382, which means having a contiguous boundary. Is this the intent?	Yes. Building height provisions for neighborhood edges were extended to include adjacent buildings - which would impact buildings across the street from low-density residential zones. This decision was in response to public concerns that allowing very tall buildings across the street from low-density residential uses can impact neighborhood character and privacy on residents. Buffering, on the other hand, addresses noise and circulation concerns that have less impact when there is a street between the two properties, so these regulations are only for abutting properties.	
116	Murphy, Kim		1/17/17	Section 5-4.23 (Expiration of Approvals) In Subsection B.2 the phrase "whichever date occurs sooner" should be changed to "whichever date occurs later", because a) the prior approved expiration date should prevail and b) the current regulation at 14-16-3-11 provides "grandfathering" period for approved Site Development Plans prior to the effective date of 14-16-3-11 which may not have yet expired.	Table 5-4-2 lists expirations for the different approval processes and specifies that once a project has been developed for more than 50% of the gross square footage, there is no expiration. The suggested change to "whichever date occurs later" would result in all existing approvals being extended to the period of validity listed in the IDO. Staff would need direction from decision-makers to make this change.	

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117	Murphy, Kim		1/17/17	Section 5-4.23 (Expiration of Approvals) Subsection C: Cite referenced in footnote 1255 (page 326) should be "current 14-16-3-11". Correct?		On Page 329, Section 14-16-5-4.23.C, update Footnote 1255 to refer to Section 14-16-3-11.
118	Murphy, Kim		1/17/17	Section 5-4.23 (Expiration of Approvals) Subsection C.2.c refers to "Major Site Plan." Should this be "Site Plan"?		On page 330, revise Section 14-16-5-4.23.C.2.c to read "... (TIS) prepared for that Site Plan if the prior..."
119	Murphy, Kim		1/17/17	Section 5-4.24 (Amendments of Existing Approvals) While this Subsection 5-4.24 deals with "approval(s) under this IDO", Subsection 1-10.3 regarding amendments to prior development approvals references Subsection 1-10.1 which in turn references this subsection as applying to major amendments to prior development approvals. Perhaps a cross-reference back to Subsection 1-10.3 would be useful.		See Line 63. Staff will consider this comment when revising Section 14-16-1-10 and 14-16-5-4.24.
120	Murphy, Kim		1/17/17	Section 5-4.24 (Amendments of Existing Approvals) Considerable additional coordination between the provisions of Subsection 1-10.3, Subsection 3-1.4, Subsection 5-5.2.D, Section 5-6 and this Subsection 5-4.24 regarding amendments to prior development approvals is in order with respect to: Minor and major amendments, Decisions requiring public meetings verses public hearings, Amendments dealing with use verses those involving development standards, Amendments concerning approved conditional uses and nonconforming uses	Noted. See Lines 63, 101-103, and 119. Section 14-16-1-10 clarifies how the IDO treats projects that have been submitted or approved prior to the effective date of the IDO. The other sections of the IDO are written primarily to address projects that will be approved after the effective date of the IDO. Property owners who have approved Site Plans or who submit projects before the effective date of the IDO should use Section 14-16-1-10 to determine how their property is treated and where to look for the appropriate regulations. Adding extensive cross-references back to Section 14-16-1-10 may be confusing for property owners and developers submitting projects after the effective date of the IDO.	See Lines 63 and 119.

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121	Murphy, Kim		1/17/17	Section 5-4.24 (Amendments of Existing Approvals) Subsection A.2: Reference to Facility Plans, Master Plans and Metropolitan Redevelopment Plans is odd. These have been adopted by the City as policy documents. However, Master Plans can also mean City-approved plans that guide and regulate development of private land, e.g. Master Development Plans. Can be confusing. In Subsection A.2 add "Master Plans" to the last phrase so it reads: "or by the procedures specified in the relevant Facility Plan, <u>Master Plan</u> , or Metropolitan Redevelopment Area."	See Lines 86 and 105.	See Line 63. Staff will consider this comment when revising 14-16-5-4.24. In Section 6.1, add a definition for "Resource Management Plan" and revise terminology throughout the IDO for consistency.
122	Murphy, Kim		1/17/17	Section 5-4.24 (Amendments of Existing Approvals) Subsection B Reference in provision #3 should be Table 4-1-1 (page 165), I believe.	Table 5-4-1, referenced in 14-16-5-4.24-B.3 is the Allowable Administrative Deviations table and is correctly referenced. Section 14-16-5-4.24-B.3 indicates that Minor Amendments may be approved to increase the height of a building beyond what is allowed by the Development Standards, but not beyond the possible Administrative Deviation(s).	See Line 63. Staff will consider this comment when revising Section 14-16-5-4.24.
123	Murphy, Kim		1/17/17	Section 5-4.24 (Amendments of Existing Approvals) Subsection C Add "plans" to line 1 of the first sentence.		See Line 63. Staff will consider this comment when revising Section 14-16-5-4.24.
124	Murphy, Kim		1/17/17	Section 5-5.2 (Decisions Requiring a Public Meeting and/or Hearing) Subsection B (Conditional Use Approval) -The reference should be 14-16-5-5.2.B not 14-16-5-5.2A.		On page 342, Section 14-16-5-5.2.B, revise to read "...provisions of this Section 14-16-5-5.2. <u>B</u> "

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125	Murphy, Kim		1/17/17	-There's a conflict regarding the decision maker for conditional uses. Table 5-1-1 says the decision maker is the ZEO. Subsection B.2.b (page 343) says the decision maker is the ZHE. And footnote 1285 (page 342) says the decision maker is EPC.	Both Table 5-1-1 and and Section 14-16-5-5.2.B.2.b indicate that the Zoning Hearing Examiner is the decision maker for Conditional Use Approvals.	On page 342, revise Footnote 1285 to remove reference to Clarion's recommendation of EPC as decision-maker to reflect current practice that the ZHE is the decision-maker for Conditional Use Approvals.
126	Murphy, Kim		1/17/17	Section 5-5.2 (Decisions Requiring a Public Meeting and/or Hearing) Subsection D (Expansion of a Nonconforming Use or Structure) Statement in Subsection that "Nonconforming site features may not be expanded." may conflict with Section 5-6.6 (page 376). What would happen in the instance where the primary structure is expanded less than 2,500 sf and, as a consequence, nonconforming site features require modification also?	The Review and Decision Criteria for Expansion of Nonconforming Uses or Structures (Section 14-16-5-5.2.D.3) includes provision e., which states that expanding the use or structure up to 25% or 2,500 sq. ft. can be approved if the expansion "will not increase an existing nonconformity or create a new nonconformity." If the expansion of a structure created a situation where parking or landscaping were removed and doing so expanded or created a nonconformity, then the ZHE would not be able to approve the expansion.	On page 377, Section 14-16-5-6.3.E, revise provision to read: "A nonconforming structure may be expanded in size by an amount not to exceed 25 percent, <u>provided that the expansion will not increase an existing nonconformity or create a new nonconformity</u> , if approved by the Zoning Hearing Examiner pursuant to Section 14-16-5-5.2.D."  On page, 346, fix cross-references to Nonconformities and Definitions in Section 14-16-5-5.2.D.1.
127	Murphy, Kim		1/17/17	Section 5-5.2 (Decisions Requiring a Public Meeting and/or Hearing) Subsection D (Expansion of a Nonconforming Use or Structure) Criteria "a" (page 346) is very subjective.	Staff believes this comment is in reference to Section 14-16-5-5.2.D.3.a. Staff is considering this comment for subsequent recommendations.	Remove D.3.b and revise language for Section 14-16-5-5.2.D.3.a.

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128	Murphy, Kim		1/17/17	Section 5-5.2 (Decisions Requiring a Public Meeting and/or Hearing) Subsection D (Expansion of a Nonconforming Use or Structure) Criteria "c" was 25% but now is 25% or 2,500 sf or less. This appears excessively limiting.	14-16-3-4 in today's Zoning Code allows up to 25% expansion allowed for nonconforming uses. The intent is to provide a balance between allowing some expansion of nonconforming buildings, while requiring compliance at a reasonable threshold. Providing a square footage threshold, in addition to the 25% threshold, is meant to address very large buildings, which would otherwise be allowed to add significant square footage if only a percentage requirement were in place. Staff would need direction from decision-makers to adjust or remove the square footage threshold.	On page 346, Section 14-16-5-5.2.D.3.c, remove the "s" on "gross floor areas."  On page 376, Section 14-16-5-6.2.B, delete "by an amount not to exceed 25 percent" so as to defer to provision in the referenced Section 14-16-5.6.2.D.  On the same page and section, fix Typo: should be "nonconforming use <u>of</u> land or structure"
129				Also, the 2,500 sf limitation appears to apply to both building floor area and site area equally.	Sections 5-5.2.D.3.c and d use the phrase "gross square footage of the structure" or "area occupied by the non-conforming use." This language does not include the site area. More information is needed about what is unclear and how to provide additional clarity.	
130	Murphy, Kim		1/17/17	Section 5-5.2 (Decisions Requiring a Public Meeting and/or Hearing) Subsection D (Expansion of a Nonconforming Use or Structure) Criteria "d" (page 343) seems to be a re-statement of "c", unless "c" is intended to address uses and "d" structures. In which case, some clarification is needed.	Staff believes the language is clear and needs more information about how to clarify further. Subsection c is intended for nonconforming uses, and d is intended for nonconforming structure.	Editorial: On page 346, Section 5-5.2.D.3, revise the articles used for "the expansion" to "an expansion" and from "a nonconforming" use/structure to "the nonconforming" use/structure to clarify what is intended in sections c and d.

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131	Murphy, Kim		1/17/17	Section 5-5.2 (Decisions Requiring a Public Meeting and/or Hearing) Subsection D (Expansion of a Nonconforming Use or Structure) Criteria "e" would be largely unavoidable, would it not?	This provision is similar to a provision in today's Zoning Code Section 14-16-3-4. While the structure may be expanded, Criteria e. refers to the expansion of a <i>different</i> nonconformity or the creation of a <i>new</i> nonconformity. As long as the expansion does not violate any Dimensional Standards (see Chapter 14-16-4) for the zone district, then the expansion may be approved.	
132	Murphy, Kim		1/17/17	Section 5-6 (Nonconformities) Many of the questions, comments and concern expressed in my November 14, 2016 memo remain. Perhaps a meeting with City staff will clarify, particularly in light of the items present above.	Noted. Staff is happy to meet with any individuals or groups who are interested in discussing their questions in more detail upon request.	
133	Murphy, Kim		1/17/17	Section 6-1 (Definitions) As noted above "Abut" is defined differently from "Adjacent". I assume this is intentional, and that the particular use of these terms in the IDO document have been carefully chosen.	See Lines 115 and 134.	
134	Murphy, Kim		1/17/17	Section 6-1 (Definitions) Note that "Contiguous" is very similar to "Abut". Definitions appear to overlap.	The IDO needs to distinguish between "abut" and "adjacent." "Contiguous" appears to be a carryover from the existing Zoning Code but is not used in the IDO. The definition for "Contiguous" references the definition for abutting but adds that it may be separated by an alley. The definition for "Adjacent" adds that it may be separated by a street.	On page 386, Section 6-1, change the definition for "Abut" to delete "contiguous" and "or border." On page 386, Section 6-1, change the definition for "Adjacent" to read: "Those properties that are abutting or separated only...". On page 392, delete the definition for "Contiguous."

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135	Murphy, Kim		1/17/17	Section 6-1 (Definitions) "Amendment" deals with policy and regulations; while minor and major amendment is document related to permits and development approvals. Can be confusing.		On page 387, Section 6-1, add to the definition of "Amendment" to include revisions to approved site plans.
136	Murphy, Kim		1/17/17	Section 6-1 (Definitions) "Area of Change" uses the term "master planned areas" which I believe is a reference to "master development plans" and not City-adopted Master Plans.		On page 388, Section 6-1, revise the definition of "Area of Change" to reference "Master Development Plans". Revise terminology throughout the IDO to distinguish the term from City facilities with Master Plans vs. private Master Development Plans. On page 44, Section 2-5.2.C, change "Master Plan" to "Master Development Plan."
137	Murphy, Kim		1/17/17	Section 6-1 (Definitions) "Dwelling, Multifamily" refers to "townhome" which I believe should be "townhouse".		On page 397, in Section 14-16-6-1, revise the definition of "Dwelling, Multifamily" to read "...and that does not meet the definition of a <u>townhouse</u> dwelling."
138	Murphy, Kim		1/17/17	Section 6-1 (Definitions) "Master Plan" seems to refer to City-adopted policy documents. The Comp Plan refers to Master Development Plans as City-approved plan governing private development. Confusing.	Noted.	See Line 136.
139	Murphy, Kim		1/17/17	NOTE: Additional review and comment may be forthcoming on the following subsections: Section 4-6 (Landscaping, Buffering & Screening), Section 4-7 (Outdoor Lighting), Section 4-9 (Solar Access), Section 4-10 (Building Design), Section 4-11 (Signs), Section 4-12 (Operation and Maintenance)	Noted.	

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140	Haines, Govinda		1/17/17	Nob Hill Highland CPO-5 (page 78): Please limit building heights (page 79) from Girard to Aliso to 39 feet and do not allow any bonuses for premium transit locations. This is consistent with the current sector plan and essential to the historic character and walkability of Nob Hill.	See Lines 82, 95-97, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill. CPO-5 refers to the height limits for the zone. This area is largely zoned MX-M, which allows 45 feet as a base height. The IDO allows additional building height along Main Street Corridors and within 660 ft. of transit stations on PT Corridors to encourage density and transit-oriented development within walking distance of transit stations. In order to respect the character of Nob Hill and the intent of the adopted Sector Plan, the CPO-5 eliminates the MS provision and restricts the PT height allowance of 65 ft to properties within 1 block of a PT station.	Add story limits to building heights in Dimensional Tables and Zone summaries.
140 (cont'd)	Haines, Govinda		1/17/17	(cont'd)	Using the base height allowance for MX-M provides consistency across the city. The Sector Plan has a height limit of 39 feet or three stories. The MX-M base height of 45 feet is also expected to result in 3-story buildings.	

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141	Haines, Govinda		1/17/17	Also, we do not want 39 feet uninterrupted walls along Central, which would block off the residential neighborhood from the commercial zone and damage the historic commercial streetscape. It is imperative that the requirement to vary massing is preserved. Please use the language (or closely equivalent) from amendment 7 to the 2007 Nob Hill Highland Sector Development Plan, "If 75% or more of the block frontage along Central is being developed or redeveloped, one third of the new development is limited to 2 stories (26 feet) in height." The seamless integration of the commercial and residential zones is fundamental to the historic character and walkability of Nob Hill.	Direction would be needed from decision-makers to further limit building height within CPO-5 or to remove the PT building height provision.	
142	Haines, Govinda		1/17/17	Please prohibit premium transit bonuses all the way to Graceland to provide an appropriate transition to the very tall building heights from Aliso to Graceland. The premium transit bonuses up to 65 ft are not consistent with the current Nob Hill-Highland SDP.	See Lines 82, 95-97, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill. Dimensional Standards that are applied differently for UC-MS-PT areas are designed to encourage development in Centers and along Corridors. Allowing development between Aliso and Graceland within the CPO-5 to use the PT Development standards will allow for a more gradual transition between the lower heights west of Aliso and the higher heights east of Graceland.  The Neighborhood Edge provisions in Section 14-16-4-8 require transitions between denser development along Central Ave and single-family residential neighborhoods.	

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143	Haines, Govinda		1/17/17	Nob Hill Highland CPO-5 (page 78): Please limit MX-T zones to 26 feet to be consistent with our current sector plan and provide an appropriate transition to historic residential properties that are typically 12 feet high.	R-1 allows building heights of 26 feet. MX-T allows both residential and commercial uses that are appropriate transitions between single-family residential neighborhoods and more intense zones. The 30-foot base height allowance is intended to be generally consistent with 26 feet building height limit of R-1 but accommodate non-residential uses, which often need 30 feet even for a single story building. Staff would need direction from decision-makers to limit the MX-T building heights to match the R-1 zone.	
144	Haines, Govinda		1/17/17	Part C, Exception to Maximum Height (page 252): Please eliminate condition (a); this condition is true for almost all properties in Nob Hill (residential standard front yard setback is 20 feet). We do not want to see any non-transparent walls greater than 3 feet in the front yard setback in Nob Hill since they damage streetscape, walkability, and community safety. Transparent fences are acceptable up to 5 feet as well as living fences (i.e. landscaping). If this change is not possible for the entire city, please prohibit non-transparent walls greater than 3 feet for all of Nob Hill residential zones (expand the mapped area on page 252 to include all of Nob Hill).	Section 14-16-4-6.9.B.6 carries forward the adopted provision from the Nob Hill Highland Sector Plan that walls cannot go higher than 3' within the Monte Vista and College View Historic District. In that SDP, wall heights are limited to 3' height only in the single-family, townhouse, and mixed residential zones within the Historic District. Staff would need direction from decision makers to expand the area where this provision applies.	On Pages 250-255, revise Section 14-16-4-6.9 for clarity.

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145	Haines, Govinda		1/17/17	Use, Carports (page 221): Please expand the map of the prohibited area in section 1.b.ii. (Page 222) to include all of Nob Hill.	As with walls, the provision that prohibits carports in the Nob Hill Highland SDP only applies to single-family, townhouse, and mixed residential zones within the Historic District. This provision has been carried forward in the IDO. Staff would need direction from decision makers to expand the area where this provision applies. See Lines 277, 296, 325-326, and 341 for carports.	
146	Negrette, Michelle		1/17/17	Please find a compiled list of major change requests identified by our team of consultants of current IDO draft regulations that negatively impact potential development. We have also attached the reports from Gibbs Planning and Placemakers for your review.	Noted. The commenter is from a City Economic Development / ABQ RIDE project team looking at encouraging Transit-Oriented Development along Central Avenue as a Premium Transit and Main Street Corridor. Staff has reviewed these reports in their entirety, which are included in the attachment to the Staff Report. Only those comments that provide recommendations for changes to the IDO have been included in this spreadsheet.	
147	Negrette, Michelle		1/17/17	Building side setbacks on interior lot lines do not allow a Main Street development.		On page 169, Table 4-1-2, Interior Side Setback, add a 0 ft. minimum for UC-MS-PT. On page 167, Table 4-1-1, Interior Side Setback, add a 0 ft. minimum for R-MH within UC-MS-PT.

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No.	Name	Representing	Date	Comment / Question / Request for Change	No Change / Explanation	Change
148	Negrette, Michelle		1/17/17	Building frontage requirements, though they vary by zone, do not create a predictable environment that attracts retail. In some areas, additional building articulation standards are required. These seem superfluous and are often hard to find and difficult to know where they apply.	Staff needs more information about the intent of this comment. Section 14-16-4-1 establishes maximum front setbacks on UC-MS-PT Corridors in order to provide a predictable environment of buildings at the street edge. Citywide building design standards in Section 14-16-4-10 are intended to require high-quality development throughout the city. This approach is part of a larger strategy to build in standards for quality up-front rather than negotiate them on a case-by-case basis through Special Use zoning or Shopping Center Site Plan approvals. The standards from adopted Sector Plans and Overlay Zones have been carried over because they reflect carefully negotiated agreements between residents and property owners to protect the character of small areas. Character Protection Overlays or Historic Protection Overlays are mapped and described in Section 2-7. Section 14-16-4-1.2.B explains that the Overlays may have different dimensional standards, which prevail if different from citywide standards. While this is still a complex system, it is much less complicated than the existing system.	

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149	Negrette, Michelle		1/17/17	Glazing requirements for retail are too low and should have clear glass.	Section 14-16-4-10.5.A sets out a requirement for 30% of the façade to be non-opaque and non-mirrored windows or doors within UC-MS-PT. CPOs for Nob Hill, EDo, and MX-FB-DT have higher requirements. In most cases, these requirements have been reduced from the adopted provisions, as the higher standards have proven problematic due to solar gain and the need for energy-efficiency. Staff would need direction from decision-makers to raise the requirement or add a requirement for clear glass. See also Lines 154, 164, 175, 214, 220, and 229.	
150	Negrette, Michelle		1/17/17	Parking standards, though improved, are too high and while much of Central has robust parking location standards, one consistent problem is the requirement to build at the corner for corner lots. Many parcels require buildings at 50% of the frontage, but the regulations do not indicate that if it's a corner parcel, the 50% must begin at the corner. This is critical for the other three corners' success, particularly in a retail/mixed use environment.	See Lines 30-34, 47, and 115 for other comments related to parking standards.	Add requirement for MS, 50% of the frontage must begin at the corner.
151	Negrette, Michelle		1/17/17	In general, reviewers found the organization of the document to be challenging, with regulations found in multiple areas. Reviewers recommended additional instructions be included on how to use the document.	The document while still complex, is much improved over today's system with multiple documents, many of which mix policy and regulation. The City intends to provide a Citizens Academy to familiarize and train staff and stakeholders on the new IDO.	

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152	Negrette, Michelle		1/17/17	Most important, height restrictions due to proximity to residential areas prevent or severely limit development to one story along Central Avenue, the area that has been identified in the Comprehensive Plan as higher density, transit oriented development.	<p>Staff believes that this comment refers to the fact that properties within CPO-5 along Central between Girard and Aliso cannot take advantage of being within a Main Street or Premium Transit station area. See Section 14-16-2-7.2.B.5.d.i.b.</p> <p>In these areas, maximum building height is proposed to be 45', which is more than one story. This comment might also be referring to the Neighborhood Edge provisions in Section 4-8, which limit building heights within 100 feet of residential zones. The shallow lots on Central might be limited to 30 feet as a result.</p> <p>Neighborhood Edge provisions are a powerful tool used intentionally to limit building heights from negatively impacting nearby residential zones. See Lines 82, 95-97, 140, 142, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.</p>	
153	Negrette, Michelle		1/17/17	In addition, reviewers have noted that it is very difficult to discern which regulations prevail and where to find them with respect to the CPO and HPO areas.	The Dimensional Standards Tables, Tables 4-1-1 - 4-1-3, indicate in their headers that "any different dimensional atandards in Sections 14-16-2-7 (Overlay Districts) and 14-16-4-8 (Neighborhood Edges) applicable to the property shall supersede the standards in" the tables. The two tables after the Table of Contents that list area-specific maps have been added to make it easier to determine where there are special rules for small areas.	

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154	Negrette, Michelle		1/17/17	Requested Change: The percentage of the façade with glazing on the first floor on any MS or PT corridor should be a minimum of 60%. Rationale: This percentage also varies across zones and overlay zones, but for a walkable pedestrian environment that assures successful retail and incentivizes redevelopment, 60% is the minimum. Residential buildings could be as low as 30% at the first floor.	See Line 149. Nob Hill, Downtown, and EDo SDPs have standards at 60% for some development. Staff is considering this comment for subsequent recommendations. It appears there may be a difference in interpretation of how to measure the surface area that should be clarified. This is meant to be reasonable for all development but still result in good, active facades. Lines 149, 164, 175, 214, 220, and 229.	
155	Negrette, Michelle		1/17/17	Table B. F Recommend the corner condition is 5' min. – 15' max for UC-MS-PT. Rationale: Promotes greater predictability that is important to the success of the urban condition.	Comment refers to Table 4-1-2 for side setback.	On page 169, Table 4-1-2, Streetside of Corner Lot Side Setback, add a 0 ft. minimum, 15 ft. maximum for UC-MS-PT. On page 167, Table 4-1-1, Streetside of Corner Lot Side Setback, add a 0 ft. minimum, 15 ft. maximum for R-MH within UC-MS-PT.
156	Negrette, Michelle		1/17/17	Table 4-1-2: Requested Change: No side setback requirements on internal lots in MX zones. Rationale: The 5' side setback prohibits a main street condition. Zero side setbacks should be permitted within the limitations of fire code. Section 2-3 allows for a zero-rear setback on the alley, but that isn't indicated in this table. It should be included for clarity.	The tables in Section 2-3 currently have blanks in Row H. These were inadvertently left blank and should be filled in.	See Line 147. On the dimensional tables for the zones in Section 2-3, add "5 ft." for "Adjacent to alley..." in Row H.

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157	Negrette, Michelle		1/17/17	<p>4-3.4 B.2.b. Requested Change: Width of sidewalk should be tied to level of pedestrian activity and should be greatest near the stations and in MX-FB and MX-H. Recommend the following change for the MX zones:</p> <ul style="list-style-type: none"> <li>-MX-T and MX-L: 8' wide</li> <li>-MX-M: 10' wide</li> <li>-MX-H and MX-FB: 15' wide</li> </ul> <p>-All sidewalks along PT corridors within 680 ft. of the station: 10' wide minimum unless in MX-H or MX-FB</p> <p>Rationale: Tying sidewalk width to property size won't assure adequate sidewalks in TOD areas.</p>		Staff is considering moving requirements to the DPM, Ch. 23 on Transportation and will consider these recommendations. The IDO will be revised accordingly based on coordination with the DPM Transportation subcommittee.
158	Negrette, Michelle		1/17/17	<p>4-5.7. A.2. Change Request: Change façade articulation standard to 50'.</p> <p>Rationale: Requires a 25' change in material or architectural elements and at that frequency will likely result in very expensive, hyperactive structures.</p>	On page 269, Section 4-10.5.A, building façade requirements are based on 40 feet. Staff recommends changing the requested standard to 40 feet to be consistent.	On page 227, Section 14-16-4-5.7.A.2, change 25 ft. to 40 ft.
159	Negrette, Michelle		1/17/17	<p>4-5.7. B and C. Change Request: The garage standards for MX-FB should be applied to station areas as well.</p> <p>Rationale: Streets should be active and pedestrian oriented along Central. MS and PT should be included under C. for a predictable built environment that incentivizes private investment.</p>	Section 4-5.7.B requires the project to build the first floor to be able to convert to retail, which would accommodate the intent of the request without proving a disincentive to development or potentially empty storefronts.	On page 227, Section 14-16-4-5.7.B, add "Premium Transit Corridor."

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160	Negrette, Michelle		1/17/17	<p>4-8.3. Change Request: Reduce step down to within 50'.</p> <p>Rationale: Requires a stepdown to 30' within 100' of a low density single-family zone. This stepdown is a common practice, but the best practice is to use a distance of 50'. The will usually be covered with the ROW if the change in zone is across the street and is normally adequate, particularly with the reduced heights in Albuquerque, to assure solar access. The R-T and R-1 zones abut much of the Central corridor, so this regulation could limit the anticipated private sector investment.</p>	<p>The Neighborhood Edge requirement for higher-intensity uses adjacent to lower-intensity residential uses was a provision important to many residents during the ABC-Z meetings. In fact, many asked for more than 100 feet. The edge provision provides protection for lower density residential areas with a standardized citywide approach that meets the intent of many customized strategies in various Sector Plans. Many residents are concerned about the higher building heights proposed in the IDO, and this provision is an important protection that makes the additional height more acceptable to nearby residents. Staff would need direction from decision-makers to lower the required distance. See also Line 152.</p>	
161	Negrette, Michelle		1/17/17	<p>4-8.5. Change Request: Clarify that 25' buffer is not needed if property is separated by a public ROW.</p> <p>Rationale: Requires a 25' buffer for any lot developed after 1990. This could be considered excessive in the TOD environment. If the ROW could contribute to the buffer, it wouldn't be an issue.</p>	<p>Section 4-8.5 requires a landscaped 10-ft buffer, not 25 ft.</p>	<p>On page 263, Section 4-8.5, edit to read as follows: "For lots abutting the zone districts listed in Section 14-16-8.2.a or b, a special buffer..."</p>

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No.	Name	Representing	Date	Comment / Question / Request for Change	No Change / Explanation	Change
162	Negrette, Michelle		1/17/17	<p>4-10.4 Requested Change: Simplify and clarify design standards.</p> <p>Rationale: This section applies a series of architectural requirements that aren't rational nor regulated with clarity. This is quite unfortunate, and while it does not preclude density or mixed use, it most likely will assure a stylistic mess when it comes to architecture. The rational, restrained American Mercantile style of historic Downtown and the more eclectic, but simple forms of Nob Hill and Old Town cannot be replicated with the requirements of this section. Fortunately, the regulations do not apply to MX-FB, but one should expect these requirements to create hyperactive, overly embellished facades that do not reflect the simple massing and composed facades of Albuquerque.</p>	<p>These regulations were drafted to allow some flexibility for property owners to comply with the IDO while creating a variety of attractive, pedestrian-oriented streetscapes. We believe that offering property owners options for compliance is more consistent with Albuquerque's economic development traditions than trying to replicate a particular style. See also Line 148, 162, and 224.</p>	
163	Negrette, Michelle	Placemakers	1/17/17	<p>While the current map indicates a direct zone translation from the existing to the IDO, this includes some poor zoning practices from mid 20th-century. For example, most of Central is zoned commercial one parcel deep for its length. While the translation to mixed use assists with this over zoning of commercial, the depth of one parcel precludes any meaningful redevelopment in many areas. The upcoming TOD planning process could be a City-sponsored shift in the zoning map to provide a more meaningful physical plan, if supported by the adjacent neighborhoods.</p>	<p>Noted. The Neighborhood Edge provision is intended to provide adequate transitions/buffers between more intense development on the corridor and lower-density residential zones behind. See Lines 152 and 160. The project team acknowledges that future efforts are needed after a new toolbox is in place with the IDO to analyze and make discretionary, elective changes to zoning to better implement the Comp Plan vision and goals.</p>	

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164	Negrette, Michelle	Placemakers	1/17/17	There are numerous ways to address percentage and type of clarity of glazing throughout Sections 2-3 and 2-7. Likely this migrated over from the sector plans, but there should be a consistent method of measurement. In general, all TOD areas should require 100% clear glass at the street. The percentage of the façade with glazing on the first floor on any MS or PT corridor should be a minimum of 60%. This percentage also varies across zones and overlay zones, but for a walkable pedestrian environment that assures successful retail and incentivizes redevelopment, 60% is the minimum. Residential buildings could be as low as 30% at the first floor.	See Lines 149, 154, 175, 214, 220, and 229.	
165	Negrette, Michelle	Placemakers	1/17/17	While much of Central has robust parking location standards, one consistent problem is the requirement to build at the corner for corner lots. Many parcels require buildings at 50% of the frontage, but the regulations do not indicate that if it's a corner parcel, the 50% must begin at the corner. This is critical for the other three corners' success, particularly in a retail/mixed use environment.	See Line 150.	

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166	Negrette, Michelle	Placemakers	1/17/17	<p>The mixed-use districts are very different in character along the Central corridor, and likely should remain so. Permitting a zero-front setback is very good, but having a uniform 15' max is a little contrived. A better reflection of character and likely a more palatable range in the blocks off Central that include the MX-T and MX-L zones would be to have an 8' – 20' range, with 0' – 12' directly on Central, or in the MX-M and MX-H zones. The homogeneous setback standard is conventional for suburbia and does not reflect local character that can be leveraged in a TOD reinvestment strategy. Nor does it assist in a publically acceptable transition to the single-family neighborhoods.</p>	<p>The 15 ft. maximum allows flexibility up to the 15 ft. vs. proscribing a variation along the corridor. This approach is intended to provide the predictability for retail uses that the commenter noted is important in previous comments while still maintaining flexibility for individual projects.</p>	

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167	Negrette, Michelle	Placemakers	1/17/17	2-4.5 Mixed-Use Form-Based Zone (MX-FB) Mapping issue: While this is a robust and very useful zone for Downtown, its expansion with a single level of intensity will likely have unintended consequences. It has effectively up zoned the edges and could create a problem with land-banking as a result. The 2025 plan allocated districts within Downtown that permitted and excluded various building types, and created immersive environments while directing economic development. The loss of that nuance could be a problem for Downtown over the long term.	The Downtown 2025 Sector Plan has a strategy that allows a broad range of uses but controls building form more tightly, largely through building types, which allow up to 8 stories, even in the Housing focus areas. Staff has found the building types to be largely ineffective and hard to apply. The IDO draft removes the building types but leaves articulation and facade requirements. These changes are intended to meet the intent of the Plan while providing maximum flexibility to develop within Downtown. The Neighborhood Edge provisions in Section 4-8 apply to development within MX-FB that is adjacent to single-family and two-family uses, which may negate the "upzoning" at the edges that the commenter describes. Staff would need direction from decision-makers to reinstate the difference in uses based on the different focus areas in today's Downtown 2025 Sector Plan.	
168	Negrette, Michelle	Placemakers	1/17/17	The language of 2.b.ii. works well, but the example illustration at c. misrepresents the intent of b. The "enter" sign should be the last thing required if the building is properly designed. The marquee illustrated as well as the central location of the door are all that is needed to illustrate the regulations of b.		Edit illustration on page 31 to remove "Enter" sign.

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169	Negrette, Michelle	Placemakers	1/17/17	2.c.i.b. is written in an unclear manner. The last sentence is giving a pass on the regulation rather than enforcing the regulation. A better practice is to simply require 65% or 75% minimum clear glazing at the frontage line. This assures an active pedestrian environment and simplifies the administration of the code. It also eliminates the problem that Downtown currently has with reflective or dark glazing that does not contribute to walkability.	Section 2-4.5.C.2.e.i.b requires 60% glazing. See also Lines 149, 154, 164, 175, 214, and 229.	On page 32, delete the second sentence in Section 2-4.5.C.2.c.i.b and move Section 2-4.5.C.2.c to follow section Section 2-4.5.C.2.e.
170	Negrette, Michelle	Placemakers	1/17/17	2.v.c. illustrates a building in the middle of a corner parcel on the right. The building should always hold the corner, and even if you do not elect to regulate that, you certainly should not illustrate the worst-case scenario. Recommend moving the building to the right corner of the illustration.		Change the illustration to move the building to the corner. Consider revisions to the text in v.b

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171	Negrette, Michelle	Placemakers	1/17/17	<p>2-5.2 Non-Residential Business Park Zone (NR-BP)</p> <p>This zone, with its restrictions on residential use, is not the ideal tool for incentivizing TOD. Additionally, its suburban lot size and setbacks will assure an auto-dependent environment. Since it occurs at Unser and Central, the Councilor of that district as well as the landowners and adjacent residents should seriously consider if this is the environment they are hoping to achieve. This zoning district works for business park solutions, but not for the needs of a TOD condition.</p>	<p>This zone district is not intended to incentivize TOD. It is the straight conversion for today's IP zone. Zone changes may be needed in the future for properties that are currently IP along Premium Transit corridors if TOD development is desired. The property owned by the City on the northwest corner of Central and Unser is currently zoned C-2. As of December 2016, the Conversion Map is showing NR-C for this property. New C-2 conversion rules that are proposed would result in this property being converted to MX-M, since the property is within 600 ft. of the Premium Transit station area. The MX-M zone would accommodate TOD development. See Line 53.</p>	See Line 53.
172	Negrette, Michelle	Placemakers	1/17/17	<p>Coors Boulevard Corridor – CPO-1</p> <p>No standards in this subsection were of critical concern and the area is limited to the north side of the Coors &amp; Central intersection.</p>	Noted.	
173	Negrette, Michelle	Placemakers	1/17/17	<p>Downtown Neighborhood Area – CPO-2</p> <p>2.c.i. requires the building setback to relate to adjacent setbacks. This could be a problem when the adjacent buildings are a suburban format such as the 20' minimum front yard setback. If this is unintended for Central Avenue, it should be clarified in this paragraph.</p>		<p>On page 69, revise Section 2-7.2.B.2.c.i to apply to "R-1A, R-T, and R-ML" properties only. Revise Section 2-7.2.B.2.c.iv, revise to apply to MX-L and MX-M properties abutting Central Ave. Revise footnote 107 to reference subsections ii and iii instead of i and ii.</p>

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174	Negrette, Michelle	Placemakers	1/17/17	Downtown Neighborhood Area – CPO-2 2.c.iv. states a 10-ft. minimum which is more appropriate, but contradicts i. In addition to the contradiction, the existing conditions of much of Central has a zero front setback. While this is permitted in the second sentence of 2.c.i., it is prohibited in the last sentence. This section needs a good bit of clean-up for clarity and harmony with the built environment. To reflect existing conditions, the overlay should permit 0 – 15 front setbacks for parcels that face Central.	Staff is considering this comment for subsequent recommendations.	
175	Negrette, Michelle	Placemakers	1/17/17	Downtown Neighborhood Area – CPO-2 2.d.ii.a.ii has no metrics to judge what a “darkly tinted” window is. The best practice in a walkable, TOD environment is to require “clear glass.” This eliminates issues with tinting and mirroring.	See Lines 149, 154, 164, 214, 220, and 229.	
176	Negrette, Michelle	Placemakers	1/17/17	East Downtown – CPO-3 There were no problems in this overlay for TOD.	Noted.	
177	Negrette, Michelle	Placemakers	1/17/17	Nob Hill Highland – CPO-5 5.D. on page 79 has a photograph that appears before the text it illustrates, thus creating confusion to its relevance. It is a best practice to regulate with illustrations rather than photography.	The photograph is intended to illustrate regulation 2-7.2B.5.d.ii.a.iv, about the vertical alignment of windows in additions above historic buildings with the existing storefront windows below. In practice, this has been confusing to explain to applicants and staff believes that the illustration from the plan helps convey the intent. The related regulation has the text "(see photo)" to clarify what the image is intended to illustrate; it is not meant to be associated with regulations that follow the image.	Replace photograph on page 79 with an illustration.

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178	Negrette, Michelle	Placemakers	1/17/17	Rio Grande Boulevard Corridor CPO-6 There were no problems in this overlay for TOD.	Noted.	
179	Negrette, Michelle	Placemakers	1/17/17	East Downtown HPO-1, Fourth Ward HPO-3, Huning Highland HPO-4, Old Town HPO-5, Silver Hill HPO-6 There may be some missed near-term value with requiring the HPOs to match scale and the limitation on expansion, but the long-term value of the character-rich historic districts offset this loss. These overlays can't be assessed for lost ROI in the near term because of the long-term value capture.	Noted.	
180	Negrette, Michelle	Placemakers	1/17/17	Section 3-2 This table will be reviewed from top to bottom and left to right for the zones in consideration: MX-T, MX-L, MX-M, MX-H, MX-FB and NR-BP. Comments will not be included for every missing use in NR-BP that is appropriate to TOD as the limitations of this zone were discussed in detail under Section 2-3.	Noted. See Lines 181-194. These comments refer to Table 3-2-1. See Also Line 171 for comments about the NR-BP zone.	
181	Negrette, Michelle	Placemakers	1/17/17	Dwelling, townhouse - The townhouse dwelling type is too low in density for MX-H and the core of MX-FB.	Single-family detached uses are disallowed in these zones as too low-density. As attached units, townhouses provide an ownership product that is higher in density and can provide options to the housing mix in these higher-density areas. Direction would be needed from decision-makers to remove TH as a permissive use in MX-H and MX-FB.	
182	Negrette, Michelle	Placemakers	1/17/17	Dwelling, live-work - The live-work is also too low in intensity for MX-H as its usually no more than a 3-story building.	See Line 181.	

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183	Negrette, Michelle	Placemakers	1/17/17	High school - The inclusion of high schools, with their excessive parking and sports demands is inappropriate in TOD areas. The large use of land for a very limited time-frame has a very poor ROI.	It is important to note that APS is not subject to the City's zoning authority, so APS school cannot be disallowed or allowed by a City zoning category. For private schools, a high school use would have to be in a building that meets the dimensional standards and other requirements for that zone. Not all high schools have the same sports and parking requirements. Amy Biehl High School works successfully downtown with neither parking nor sports demands. See chapter 14-16-4 for site and building design standards for all zones. See also Agency Comments from APS.	
184	Negrette, Michelle	Placemakers	1/17/17	Religious Institution - The inclusion of large religious institutions, with their excessive parking and low use is inappropriate in TOD areas. Recommend this use is CV.	See Line 183. A religious use in a TOD area would be subject to the dimensional standards for that zone. Many churches function successfully within urban areas of town.	
185	Negrette, Michelle	Placemakers	1/17/17	Sports field - The inclusion of sports fields, with their excessive parking and limited use is inappropriate in TOD areas. The large use of land for a very limited time-frame has a very poor ROI.	Land costs and other market factors would seem to preclude sports fields from developing in areas with high TOD potential. It does not seem necessary to make them a prohibited use, particularly as there is not one zone for TOD but rather the full spectrum of mixed-use zones.	
186	Negrette, Michelle	Placemakers	1/17/17	Food, Beverage, etc. - This section is extremely limited for MX-T. Neighborhood pubs and cafes are an asset in this transition area.	See Line 87. Neighborhood-serving pubs and cafes are appropriate in MX-L, which is meant to include these uses. MX-T is meant as the transition zone between residential and the neighborhood-serving uses in MX-L. Direction would be needed from decision makers to allow these more intense uses in the Transition zone.	

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187	Negrette, Michelle	Placemakers	1/17/17	Motor Vehicle-Related - For the purposes of TOD ROI, the permissive use of autodependent facilities is excessive along the Central corridor. Many of these may be built in an urban format, but they are all heavy non-transit trip generators. At a minimum car wash, light vehicle repair, and light vehicle sales and rental should be conditional uses. Particularly since many of these uses were prohibited in the base sector plans.	See Line 185. More information is needed about where auto-related uses are prohibited along Central Ave. Direction would be needed from decision-makers to disallow auto-related uses along Central. If such uses were to be prohibited, new Use Specific Standards should be added to prohibit these uses within 660 feet of PT stations and/or along Main Streets and/or within Urban Centers.	
188	Negrette, Michelle	Placemakers	1/17/17	Self-storage - This use is entirely inappropriate on a MS or PT corridor as well as in a TOD due to the lack of public space activation, high trip generation, lack of pedestrian activity, and blank walls. Recommend removal from all station areas, MS and PT corridors unless limited to upper floors of a multistory building.	See Lines 88 and 185. See also Section 14-16-3-3.4.X for use-specific standards for self-storage uses.  As with schools or any other uses that take up a lot of space and generate a lot of trips, this use would have to be on a site and in a building that meet the dimensional standards and other requirements for the zone where the use is located. See Line 183. There is some indication that self-storage facilities are complementary uses for multi-family uses, and that both might be needed in more urban areas.	See Line 88.
189	Negrette, Michelle	Placemakers	1/17/17	Retail - With the limitation on non-residential uses across all general categories in the MX-T zone, it is apparent that this zoning district will not be meaningful for the flexibility required by TOD. Recommend revisiting the definition of the district in 2-4.1. The inclusion of cafes, bakeries, and small retail all perfectly fit the description, but are prohibited in this table. There needs to be a realignment of the stated character with the permitted uses.	See Line 87. MX-T is not intended to encourage TOD but rather to transition from residential zones to more intense zones where TOD would be more appropriate. The traffic impacts of retail are not appropriate in this transition zone meant to be the closest to residential zones. Staff would need direction from decision makers to allow more retail in MX-T.	

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190	Negrette, Michelle	Placemakers	1/17/17	Pawn shop - The permissive use of pawn shops across most mixed-use zones could have negative consequences. Recommend C in all MX zones.	Pawn shops have a Use Specific Standard limiting more than one pawn shop within a 2-mile radius. These seems more than adequate to protect mixed-use areas. See Section 3-3.4.EE.	
191	Negrette, Michelle	Placemakers	1/17/17	Drive-through etc. - These should be conditional in all MX zones since this is the base of the urban fabric for Albuquerque and represents most of the sector plans. While the overlays and 3-3.6 D. will supersede this table, for clarity there is no reason they should be permitted in areas where they are largely excluded and the is a priority on premium transit.	MX-T through MX-H are the base zone conversions for O-1 through C-3 throughout the city. MX-T does not allow drive-throughs at all. MX-M allows them permissively (as does C-2). The other MX zones allow them conditionally. The higher-quality standards and more pedestrian-friendly design requirements in Section 4-5.9 are intended to ensure quality drive throughs and protect pedestrians better than today's standards. See also Line 90.	
192	Negrette, Michelle	Placemakers	1/17/17	3-3.2 F. Townhouses should require rear garages in all MX zones.	Alley access is not available throughout the city. Requiring rear access would severely limit the potential for townhouse development in these areas.	
193	Negrette, Michelle	Placemakers	1/17/17	3-3.2 H.1. Has a test calculation been done to see how many trees would be required on a possible lot? For example, the condo development on the SE corner of Central and Carlisle could require 20 trees on site. This standard should be calibrated to change based upon context – more trees required in suburban conditions and fewer in urban contexts.	The tree requirements in Section 14-16-3-3.2.H were added since the Consolidated Draft of the IDO in response to a Council Resolution adopted in 2016.	On page 123, Section 14-16-3-3.2.H, add a provision that requires trees only for the first-floor units within DT-UC-PT-MS areas.
194	Negrette, Michelle	Placemakers	1/17/17	3-3.4 X. If self-storage is permitted in MX zones it should be limited to stories above the first level and be required to have fenestration on the upper levels.	See Line 188. Staff believes the Use-specific Standard that requires access from interior corridors is sufficient for MX-M.	On page 136, add a Use Specific Standard for MX-H and MX-FB zones that requires a building of two story or more and requires glazing on the upper levels.

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195	Negrette, Michelle	Placemakers	1/17/17	Table 4-1-2: setback and build-to regulations were discussed in section 2-3. The 5' side setback prohibits a main street condition. Zero side setbacks should be permitted within the limitations of fire code. Section 2-3 allows for a zero-rear setback on the alley, but that isn't indicated in this table. It should be included for clarity.	See Lines 147 and 156.	See Lines 147 and 156.
196	Negrette, Michelle	Placemakers	1/17/17	Were studies done to show that the densities permitted can actually be achieved with these bulk standards? The bulk and density should match.	No. The general approach was not to correlate density with building heights but to allow property owners to use the property for many building types and be creative about maximizing one or the other standard.	
197	Negrette, Michelle	Placemakers	1/17/17	Table 4-1-4: Awnings, canopies, sills, etc. should all be allowed to encroach into the right-of-way to within 2' of the curb. This is common along Central and critical to successful retail.	This table does not address the type of encroachments requested here, which are generally permitted within the right-of-way with a permit.	Staff will ensure that encroachments into the right-of-way are adequately addressed in the DPM and allowed in retail areas.
198	Negrette, Michelle	Placemakers	1/17/17	4-3.4.B.2.b. Tying sidewalk width to property size won't assure adequate sidewalks in TOD areas. Width should be tied to level of pedestrian activity and should be greatest near the stations and in MX-FB and MX-H. Recommend the following change for the MX zones: MX-T and MX-L: 8' wide, MX-M: 10' wide, MX-H and MX-FB: 15' wide, All sidewalks along PT corridors within 680 ft. of the station: 10' wide minimum unless in MX-H or MX-FB		See Line 157.

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199	Negrette, Michelle	Placemakers	1/17/17	Table 4-5-1. The new parking requirements are definitely an improvement however they are still unreasonably high for station areas across most uses. This can be a major barrier to redevelopment unless there is a municipal parking reserve that the applicant may utilize for a portion of their requirements.	See Lines 30-34, 47, 115, and 150 for other comments related to parking standards.	
200	Negrette, Michelle	Placemakers	1/17/17	4-5.3 D. The shared parking reductions and proximity to transit assist in the parking burden, but some of the reduction factors are non-standard. Residential and office usually share at 1.4.	See Lines 30-34, 47, and 115 for other comments related to parking standards. Staff would need direction from	
201	Negrette, Michelle	Placemakers	1/17/17	The calculation for station proximity is unclear. How is the 660' calculated? To the edge of the property? If the station is in the center lane, does the crossing distance count, or is it calculated along the street? This distance only benefits the directly adjacent property in most situations. A best practice is to do significant reductions for a minimum of a block, so in the historic blocks of Albuquerque, it should be 400'. Ideally, parking quotas would be market-based rather than regulated within that distance of a station.	See the definition for Measurement, PT Area on page 408.	On page 215, Section 14-16-4-5.3.D.3.b revise section to read "within 660 ft. of transit stations" to address the typo in this section.
202	Negrette, Michelle	Placemakers	1/17/17	The TOD planning charrette will address the parking issues in detail with Nelson/Nygaard consulting on the issue. It would be ideal if their recommendations could be considered for the final draft of the IDO.	Noted. Comments submitted during the IDO review process at EPC and City Council will be included as part of the record for the project.	
203	Negrette, Michelle	Placemakers	1/17/17	4-5.6. Parking location and design is well written and will produce a predictable, walkable TOD environment.	Noted.	

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204	Negrette, Michelle	Placemakers	1/17/17	4-5.7. A.2. requires a 25' change in material or architectural elements and at that frequency will likely result in very expensive, hyperactive structures. The common requirement for façade articulation is 50'.	See Line 158.	See Line 158.
205	Negrette, Michelle	Placemakers	1/17/17	4-5.7. B and C. The garage standards for MX-FB should be applied to station areas as well. Streets should be active and pedestrian oriented along Central. MS and PT should be included under C. for a predictable built environment that incentivizes private investment.	See Line 159.	See Line 159.
206	Negrette, Michelle	Placemakers	1/17/17	4-6.3. B.1. requires a minimum of 10% of the lot is landscaped in the most urban environments including Downtown, Urban Centers, and Main Streets. This is an excessive area, and other than street trees and parking lot landscaping, landscape should not be required on urban lots. The city of London, with its many parks and squares is approximately 5% open space. This requirement precludes a zero-setback urban frontage, and will make it difficult to meet the parking requirements of UC and MS.	The definition of landscaped area is intended to include planters and street tree wells. Section 14-16-4-6.3.B also clarifies that in these areas, the landscaped area need not be at ground level - i.e. rooftop gardens and planters on rooftops and public balconies may be included in this requirement.	On pages 232-233, review and revise Section 14-16-4-6.3 as necessary to improve clarity of regulatory language.  On page 405, revise definition of "Landscaped Area" for increased clarity.
207	Negrette, Michelle	Placemakers	1/17/17	4-6.3. B.3. requires any area greater than 36 sf be covered with living, vegetative materials. The question is if this includes plazas? How are street trees calculated? Sub-section c. requires a minimum of five species but that seems to be for any area larger than 36 sf. This should be scaled to reflect area rather than a single standard. Five different plants will be very chaotic for an area as small as 6' x 6'.	See Line 206.	See Line 206.

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208	Negrette, Michelle	Placemakers	1/17/17	4-6.5. B.1. and C.1. requirements are not a problem.	Noted.	
209	Negrette, Michelle	Placemakers	1/17/17	4-6.7. is a suburban standard. There should be a separate exemption for Downtown, UC, and MS since most of these conditions will have a 0' front setback.		On page 247, Section 4-6.7, revise to begin the provision with "In all but DT, UC, PT, and MS areas,"
210	Negrette, Michelle	Placemakers	1/17/17	4-8.3. requires a stepdown to 30' within 100' of a low density single -family zone. This stepdown is a common practice, but the best practice is to use a distance of 50'. This will usually be covered with the ROW if the change of zone is across the street and is normally adequate, particularly with the reduced heights in Albuquerque, to assure solar access. The R-T and R-1 zones abut much of the Central corridor, so this regulation could limit the anticipated private sector investment.	See Lines 82, 139, and 160.	
211	Negrette, Michelle	Placemakers	1/17/17	4-8.5. requires a 25' buffer for any lot developed after 1990. This could be considered excessive in the TOD environment. If the ROW could contribute to the buffer, it wouldn't be an issue.	See Line 161.	See Line 161.
212	Negrette, Michelle	Placemakers	1/17/17	4-8.6. requires a 40' separation from parking. This is excessive and would equal 2/ 3 of a parking bay. This subsection also requires the same edge lot buffering requirements as Industrial which is entirely inappropriate for mixed-use or TOD.	The Neighborhood Edge provisions are an important tool meant to protect lower-density residential zones next to higher-intensity zones. Direction from decision-makers would be needed to change the standard.	On page 263, Section 4-8.6, exempt lots less than 10,000 square feet and revise the text to require 40 feet or 25% of the lot depth, whichever is less.

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213	Negrette, Michelle	Placemakers	1/17/17	4-10.4 applies a series of architectural requirements that aren't rational nor regulated with clarity. This is quite unfortunate, and while it does not preclude density or mixed use, it most likely will assure a stylistic mess when it comes to architecture. The rational, restrained American Mercantile style of historic Downtown and the more eclectic, but simple forms of Nob Hill and Old Town cannot be replicated with the requirements of this section. Fortunately, the regulations do not apply to MX-FB, but one should expect these requirements to create hyperactive, overly embellished facades that do not reflect the simple massing and composed facades of Albuquerque.	See Lines 148, 162, and 224.	
214	Negrette, Michelle	Placemakers	1/17/17	4-10.4.B.2 only requires 10% doors and windows while Section 2 has multiple requirements, most around 60% glazing at the first floor. It isn't clear if this is a contradiction, or if it is meant to cover other areas outside of those regulated in Section 2.	See Lines 149, 154, 164, 175, 220, and 229.	
215	Negrette, Michelle	Placemakers	1/17/17	4-10.5 also applies a series of regulations that will likely produce a hyperactive, non-contextual façade. The following in particular are problematic :	See Lines 148, 162, 213, and 224.	
216	Negrette, Michelle	Placemakers	1/17/17	A.1.a. would not permit the following storefronts: (comment includes photos of 2 buildings located in Albuquerque).	Staff is considering this comment for subsequent recommendations.	

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217	Negrette, Michelle	Placemakers	1/17/17	A.1.c.ii. prohibits the historic American Mercantile common on Central Avenue, particularly in Downtown unless it is clear that tall windows are an acceptable solution to this requirement.	Staff is considering this comment for subsequent recommendations.	
218	Negrette, Michelle	Placemakers	1/17/17	A.1.c.iii. is inappropriate in a zero setback TOD environment. Applying this specifically to the Downtown, Urban Center, Main Street and Premium Transit Areas is a misunderstanding of the urban context.	Staff is considering this comment for subsequent recommendations.	
219	Negrette, Michelle	Placemakers	1/17/17	A.1.c.iv. is inappropriate in a zero setback TOD environment. Applying this specifically to the Downtown, Urban Center, Main Street and Premium Transit Areas is a misunderstanding of the urban context.	Staff is considering this comment for subsequent recommendations.	
220	Negrette, Michelle	Placemakers	1/17/17	A.1.e.ii is yet another standard for glazing. There should be a single location, probably best served in the zoning district standards, that governs glazing.	See Lines 149, 154, 164, 175, 214, and 229.	
221	Negrette, Michelle	Placemakers	1/17/17	B.1. and 2. have good intent, but to require public gathering areas for each 40' or 60' of a MS or TOD environment is expecting the building to provide a neighborhood amenity on a single parcel. One plaza or seating area per block is sufficient. This regulation is giving up a large percentage of marketable area unless sidewalk dining could be considered part of it. And even then, it is requiring every building to have food service.	These standards were drawn from the 'Big Box' regulations in the zoning code and made citywide, as part of the projects improvements to raise the quality of design standards for all development. The IDO regulations require some outdoor gathering area for large buildings that would have many employees. There is no requirement that it be provided at certain intervals along the building facade or that it is publically accessible. These areas could be provided in decks or rooftop areas. Direction from decision-makers would be required to change this requirement.	

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222	Negrette, Michelle	Placemakers	1/17/17	Table 4-11-2 limits projecting signs to buildings 100' or greater in width. This is unfortunate as blade signs and hanging signs are very common historic types in Albuquerque and are appropriate on narrow buildings. This table also permits monument signs which are suburban in type and inappropriate in MS, UC, PT contexts.		On page 278, Table 4-11-2, delete "Lot must have 100' linear feet of frontage for the sign to be permitted." Revisit CPOs to add provisions reflecting existing prohibitions on Monument signs.
223	Negrette, Michelle	Placemakers	1/17/17	The scattered regulations make it difficult to find everything that applies to a specific parcel and will introduce the possibility of applicant frustration. However, it is a vast improvement over the current disparate ordinances. In addition, there is further opportunity for confusion with zoning districts, overlays, and place types all having overlapping and contradictory standards. A user's manual will likely be needed to show all the regulations that may apply to a single parcel.	This IDO organizes standards by type as opposed to repeating standards in each zone. This organization keeps the IDO shorter but does require looking at multiple sections for a particular parcel. Even when more standards are included with each zone description in other Zoning Codes, there are other sections you must read to learn all the rules that apply to a single property. Staff is comfortable with the proposed IDO organization as both efficient and rational.	

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224	Negrette, Michelle	Placemakers	1/17/17	Predictability - While it is quite possible to achieve close to the anticipated ROI from premium transit along the Central corridor with this draft of the IDO, it is also quite possible to build less than urban standards within all the MX districts, with the current parking regulations, and with specific standards associated with Downtown, Main Streets, Urban Centers and Premium Transit. Many of the requirements of 4-10, while the intent is good, will likely result in fussy, excessive architectural expression and buildings that are more expensive and less urban due to the offsets required. This lack of predictability will likely disincentivize private sector development.	See Line 148. The building design standards in Section 4-10 are intended to raise the quality of development in general, which should raise predictability for all property owners. These standards are also intended to assure residents and neighbors that the IDO is requiring high standards that can be applied objectively by staff, as opposed to negotiating quality standards for each project on a case-by-case basis before the EPC. Without building design standards, more discretionary review would be required, which increasing the risk and lessens predicatbility of high-quality development throughout the city. More information is needed about how these standards should be adjusted to result in more predictable, high-quality development.	
225	Negrette, Michelle	Gibbs Planning Group	1/17/17	This review of the proposed Integrated Development Ordinance (IDO) finds that the present draft is a forward-thinking advancement of the existing zoning regulations and the adopted sector development plan, that has the potential to positively impact existing and future retail development in the Nob Hill Highland neighborhood. The IDO removes many of the onerous regulations of the Comprehensive City Zoning Code, while improving and complementing the form-based aspirations of the SDP.	Noted.	

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226	Negrette, Michelle	Gibbs Planning Group	1/17/17	<p>However, there are improvements that should be considered to better support existing retailers, promote retail industry development standards and further the vibrancy and sustainability of retail commerce in the Nob Hill neighborhood. They are as follows:</p> <ul style="list-style-type: none"> <li>• Addition of a frontage-type or architectural standard for buildings facing Central Avenue that promotes retail industry standards.</li> <li>• Remove side-yard setbacks for interior lots to allow for continuous frontage along Central Avenue.</li> <li>• Eliminate maximum building height and replace with maximum building floors.</li> <li>• Expand sign code to allow for 3-dimensional signage.</li> <li>• Allow flexibility in street tree requirements to prevent visual blockage of building entrances, displays or signage.</li> </ul>	Noted. See Lines 228-235 for more detailed discussion of each of these recommendations.	

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227	Negrette, Michelle	Gibbs Planning Group	1/17/17	<p>Analysis: GPG finds that the proposed IDO contains several provisions which are improvements on previously established code or introduce new progressive requirements that favor retail development. These include:</p> <ul style="list-style-type: none"> <li>• Chapter 14-16-2-4.5 (e-iv) Corner Buildings – Corner buildings shall encourage intersection activity through their design.</li> <li>• Chapter 14-16-4-5 Parking and Loading: Parking requirements establish progressive minimums with advantageous adjustments and credits based on shared parking, proximity to transit and onstreet parking.</li> <li>• Chapter 14-16-4-6.6 Parking Lot Landscaping: Screening requirements for surface parking lots located within 30 feet of the front lot line.</li> </ul>	Noted.	

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228	Negrette, Michelle	Gibbs Planning Group	1/17/17	<p>Recommendation: Chapter 14-16-4 Development Standards should include a retail-specific frontage-type or architectural standard. Discussion: The proposed development standards improve upon previous regulations; however, the generalized Mixed-Use Medium Intensity classification is less prescriptive for retail development because it must apply to a wide variety of blocks along Central Avenue. There is an effort to promote retail frontage through the Nob Hill Character Protection Overlay Zone and the Mixed-Use Form-Based Standards, yet retail industry standards could more effectively be enforced through a frontage-type or architectural standard. A retail-specific standard should address storefront design, store lighting, store maintenance, visual merchandising, signage and awnings. See Chapter 9 of Principles of Urban Retail Planning and Development.</p>	<p>The IDO does not regulate frontage types. Many of the commenter's recommendations for retail will be incorporated based on market conditions, which do not require City enforcement. Albuquerque's development market may not be hot enough to cover the higher costs associated with more minute regulations. These more detailed standards might be more appropriately applied by a Main Street organization.</p>	
229	Negrette, Michelle	Gibbs Planning Group	1/17/17	<p>Recommendation: Chapter 14-16-2-7.4 Nob Hill Character Protection Overlay Zone should require 75 percent fenestration on the ground floor as prescribed in MU-FB District Standards. Discussion: The Nob Hill CPO requirement of 60 percent fenestration is more appropriate for northern climates. The 75 percent requirement in the MU-FB District Standards is more suitable for the character of retail along Central Avenue.</p>	<p>The higher fenestration requirements in the existing Nob Hill SDP have proven problematic for recent development. While an active façade is an important consideration, energy efficiency, solar gain on southern exposures, and other design requirements must also be addressed and balanced. The revised standards in the IDO are intended to strike a balance between the need for fenestration and other façade considerations. See also Lines 149, 154, 164, 175, 214, and 220.</p>	

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230	Negrette, Michelle	Gibbs Planning Group	1/17/17	<p>Recommendation: Chapter 14-16-4-1.4 Mixed-Use District Dimensional Standards should eliminate minimum lot size for residential land uses.</p> <p>Discussion: Most Nob Hill Highland blocks have a parcel depth of 100 to 150 feet suggesting that a residential development would need at least 145' (approximately three existing residential parcels) of block frontage to satisfy the minimum lot size. Ultimately, this prevents the type of "missing middle" housing that would be most appropriate for the Nob Hill Highland neighborhood.</p>	Minimum lot sizes have been deleted from the Mixed-use zone districts.	
231	Negrette, Michelle	Gibbs Planning Group	1/17/17	<p>Recommendation: Chapter 14-16-4-1.4 Mixed-Use District Dimensional Standards should eliminate side-yard setbacks.</p> <p>Discussion: Typical "Main Street" type development places buildings side-by-side with no side setbacks and there are many blocks along Central Avenue that exist in this layout. Side yard setbacks break apart an otherwise continuous urban block frontage. There should be a requirement for at least one midblock break in building frontage when public parking is located in the rear.</p>		See Line 147.

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232	Negrette, Michelle	Gibbs Planning Group	1/17/17	<p>Recommendation: Chapter 14-16-4-1.4 Mixed-Use District Dimensional Standards should eliminate maximum building height and instead limit the number of stories.</p> <p>Discussion: Modern retail development characteristically includes 14- to 18-foot floor to ceiling heights on the ground level, while office and residential heights can vary according to use and type. The current 55-foot maximum may limit 4-story development. GPG recommends the IDO considers allowing 5-story development, as long as it appears like 4 stories from the street, as this represents the most efficient development under current building-type construction limitations.</p>	<p>This comment refers to a previous version of the IDO that allowed 55 feet in MX-M for UC-PT-MS. The 65' associated with UC-MS-PT is designed to accommodate 5-story buildings. The 45 feet associated with MX-M is designed to accommodate 3 stories. The IDO generally assumes 15' first floor plus 12' upper floors. The extra feet provided in both allow the flexibility for taller first or penthouse floors. Providing maximum building height provides the most predictable outcomes for residents, neighbors, and property owners. Residents often cite fears that developers might build 5 18-foot stories and result in 90-foot tall 5-story buildings. See Lines 82, 95-97, 140, 142, 152, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.</p>	See Line 140.
233	Negrette, Michelle	Gibbs Planning Group	1/17/17	<p>Recommendation: Chapter 14-16-4-6.4 Street Frontage and Front Yard Landscaping should be flexible in street tree planting requirements to prevent the blockage of building entrances, displays or signage.</p> <p>Discussion: Many retailers do not have robust marketing budgets and are dependent on their visibility from the street as advertising. Street tree planting requirements should allow for asymmetrical planting, small variations in the spacing between street trees and encourage planting near property lines or the edges of buildings.</p>	<p>The IDO includes flexibility for the Planning Director to allow different placement of landscaping as long as it amounts to the minimum requirement. See Section 4-6.4.P.</p>	

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234	Negrette, Michelle	Gibbs Planning Group	1/17/17	<p>Recommendation: Chapter 14-16-4-10.6 Signs in Mixed Use and Non-Residential Zones should allow for and encourage 3-dimensional sculptural projecting signs.</p> <p>Discussion: Giving retailers an incentive to fabricate creative and unique signage contributes to the overall character of a neighborhood retail district. Visually appealing signage should be encouraged with size bonuses.</p>	Signage requirements are generally carried over from existing standards. Direction would be needed from decision-makers to create new signage standards to allow unique, 3-D, sculptural signage in Centers and Corridors (DT-UC-MS-PT).	
235	Negrette, Michelle	Gibbs Planning Group	1/17/17	<p>Recommendation: Chapter 14-16-4-10.6 Portable Sign Standards should be more explicit in prohibiting plastic or generic portable signs.</p> <p>Discussion: Plastic or generic portable signs can portray a retail area as cheap and poorly managed. Portable signs should have the appearance of being hand-made and use durable materials.</p>	The City would struggle to enforce a requirement for quality portable signs, and it may not be worth regulating by the City. Such standards might be better administered by a Main Street organization or Business Improvement District.	
236	Negrette, Michelle	Gibbs Planning Group	1/17/17	<p>Further Considerations: In addition to a review of the proposed IDO, GPG has been asked to provide suggestions to improve the retail commerce in Nob Hill and Albuquerque more broadly. These include short-term considerations for operations during the construction of the Albuquerque Rapid Transit (ART) and long-term strategies for tenant mix, anchor attraction and transit-oriented development. The following includes a discussion of each topic with key recommendations.</p>	These recommendations were for actions unrelated to the IDO and are therefore not included in this comment response matrix. See the full letter in the project file for these recommendations.	

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237	Negrette, Michelle	CABQ Econ Dev/UNM/ Greater Central Ave.	1/17/17	The purpose of the second IDO testing workshop was to assemble diverse groups that included a developer, a banker/lender, a neighborhood leader, a designer/architect, and a planner/ engineer and simulate the development of a mock project on small fictitious site on Central Avenue in Albuquerque using the proposed IDO. The goal of this exercise was to answer the following questions: 1. Can the proposed IDO work on small size lots? 2. Does the IDO create context sensitive design? 3. Are small sized developments using the proposed IDO be financially feasible for the developer?	Noted. The project team attended this testing session on Sept 21, 2016, and was provided copies of the report when it was released prior to submission of the EPC Draft IDO. In revising the Draft IDO for EPC submission, staff addressed many of the concerns raised in this process.	
238	Negrette, Michelle	Greater Central Ave.	1/17/17	Approximately 75 people attended the workshop, which was held from 6:00 pm until 8:30 on Wednesday, September 21, 2016. Dinner was provided by Economic Development and attendees sat at assigned tables, grouped by neighborhood area of interest. The attendees represented a diverse set of players related to land use planning and project development.	Lines 239-274 include only the recommendations from the IDO testing session workshop. The remainder of the report can be found in the record for the project.	
239	Negrette, Michelle	Greater Central Ave.	1/17/17	Of the 8 groups, 4 tables resulted in a developable project, 3 did not pencil, and 1 did not finish.	Noted. The IDO is intended to balance the need to encourage development with requiring adequate standards that result in predictable, high-quality outcomes.	
240	Negrette, Michelle	Greater Central Ave.	1/17/17	All tables initially realized their lots were undevelopable by current zoning limit of .5 acres. Lots ranged from 50' x 150' to 150' x 150.'	The minimum lot size requirement was removed in a subsequent draft of the IDO.	

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241	Negrette, Michelle	Greater Central Ave.	1/17/17	Tables with a CPO had difficulty determining what triggered the requirements, which requirements trumped and some did not follow them.	Subsequent drafts provided a table of contents with small-area mapped standards. Because it is easy to overlook Overlays, they are used sparingly in the IDO. More often, mapped standards are found in the section relevant to that particular standard - such as mapped prohibitions of taller front walls in the front wall section. Having all the standards in one document, even in separate sections, is still a huge improvement over standards being buried in separate documents, sometimes multiple standalone documents. Just as today, interactive maps and Zone Atlas maps show where SU-2 zones apply, the Overlay zones will appear in future maps.	
242	Negrette, Michelle	Greater Central Ave.	1/17/17	Parking generally was an issue, particularly on lots smaller than 100' x 100.'	More information is needed about what the issue was related to parking. Presumably, too much parking was required in the IDO, but more information is needed about what should be adjusted.	
243	Negrette, Michelle	Greater Central Ave.	1/17/17	Typical community demands, such as height limits and underground parking generally negatively impacted a development to happen. However, if no parking was required, heights could be limited. Additional height bonuses did not help underground parking pencil.	Noted. More information is needed about what should be adjusted.	
244	Negrette, Michelle	Greater Central Ave.	1/17/17	All lots were under developable limit of .5 acres. This precludes small scale infill development, supports buildings that have at least ½ block frontage, requires land aggregation and renders many smaller lots undevelopable.	See Line 240.	

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245	Negrette, Michelle	Greater Central Ave.	1/17/17	Parking requirements difficult to meet in almost all cases. Underground parking does not pencil, guest parking for residential is difficult to accommodate, hotel parking is not realistic.	Finding the right balance of how much parking to require is challenging. Residents in Nob Hill and Downtown Neighborhood Area decry the absence of parking restrictions, which impacts nearby residents as they see shoppers and diners parking on the street in front of their homes. However, the fact that these areas are seeing development may be partly attributable to the lack of parking requirements, which incentivizes development. The IDO parking requirements are intended to provide a reasonable minimum requirement. Direction would be needed from decision-makers to adjust these requirements.	On page 207, Table 4-5-1, add a new standard for hotel parking in DT-UC-PT-MS areas of 2 spaces per 3 hotel rooms.
246	Negrette, Michelle	Greater Central Ave.	1/17/17	Setback requirements are confusing and sideyard setbacks are introduced where not currently required, creating 10' alleys between buildings. Setbacks are limiting developable land area on small lots.	Section 5-4.15 and Table 5-4-1 were added to a subsequent version of the IDO to allow more flexibility for setbacks on small lots. Direction would be needed from decision-makers to make further changes. See also Lines 147 for adjustments to side setbacks.	See Line 147.

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247	Negrette, Michelle	Greater Central Ave.	1/17/17	Open space and landscaping requirements are difficult to understand, landscape requirements do not necessarily benefit streetscape, open space requirements are not clear if roofs and balconies count.	Tables 4-1-1 through 4-1-3 establish minimum requirements for Usable Open Space as part of the tables that general establish the buildable envelope on each lot. Usable Open Space is defined in Section 6-1 and includes roof decks and balconies. Landscape requirements are established in Section 4-6. The Street Tree Ordinance separately requires tree planting along streets that are Collector or above. Direction would be needed from decision-makers to add further requirements for landscaped areas along public rights-of-way or to allow street trees to count toward landscape requirements for private property. In general, many residents have expressed a desire for more, not less landscaping, even in urban areas. Of course, landscape requirements must be balanced with the feasibility of high-quality development.	
248	Negrette, Michelle	Greater Central Ave.	1/17/17	Recommendations for MX-M and MX-L zones:	See Lines 249-256.	
249	Negrette, Michelle	Greater Central Ave.	1/17/17	Remove lot size limitation.	See Line 240.	
250	Negrette, Michelle	Greater Central Ave.	1/17/17	Remove side and rear setback requirements.	See Lines 147 and 246 for side setbacks.	See Line 147.
251	Negrette, Michelle	Greater Central Ave.	1/17/17	Clarify the open space requirements, allow rooftop and balcony to count.	Both rooftop decks and balconies count as usable open space. See Line 247.	
252	Negrette, Michelle	Greater Central Ave.	1/17/17	Encourage landscape requirements to be used in public realm, provide incentives.	See Line 247.	
253	Negrette, Michelle	Greater Central Ave.	1/17/17	Reduce required parking for hotel use.	See Line 245. More information is needed about what would be a better standard for hotel parking.	

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254	Negrette, Michelle	Greater Central Ave.	1/17/17	Modify parking requirements, suggestions include regulating only uses which generate heavy parking needs, increasing parking reductions for residential in transit areas, reducing guest parking requirements, removing parking requirements on small lots.	See Line 245.	See Line 245.
255	Negrette, Michelle	Greater Central Ave.	1/17/17	CPO needs to be clearly identified as how and when it trumps straight zoning, what variance process can be applied and which areas have CPO. Should indicate CPO overlay on a map.	Overlay zones will be mapped by AGIS on an interactive map and in the Zone Atlas. Overlay requirements supercede straight zoning requirements, as specified in Section 2-7 and again in Section 4-1.2.B. Variances are generally not affected by Overlays. Variances are described in Section 5-5.2.K. View Protection Overlays are not eligible for Administrative Deviations, as described in Section 2.7-4.D and Table 5-4-1.	On page 320, edit Table 5-4-1 to remove reference to VPOs. In Section 5-4.15.B.4, edit to read as follows: "The requested deviation does not affect a property subject to a View Protection Overlay zone."
256	Negrette, Michelle	Greater Central Ave.	1/17/17	Clarify if alley is considered a street for setback purposes and parking access.		On page 387, Section 6-1, add to the definition of "Alley" to clarify that alleys do not count as streets for setback standards, unless specifically called out.
257	Negrette, Michelle	Greater Central Ave.	1/17/17	General Comments:	See Lines 258-274.	
258	Negrette, Michelle	Greater Central Ave.	1/17/17	Clarify if alley is considered a street for setback purposes and parking access.		See Line 256.
259	Negrette, Michelle	Greater Central Ave.	1/17/17	All lots were too small for zoning. Min lot size would have prevented development.	See Line 240.	
261	Negrette, Michelle	Greater Central Ave.	1/17/17	3rd floor made project pencil.	Noted. See Line 232.	
262	Negrette, Michelle	Greater Central Ave.	1/17/17	Open space requirement met by courtyard for residents.	Noted. See Line 247.	
263	Negrette, Michelle	Greater Central Ave.	1/17/17	Added retail store frontage.	Noted. The IDO is intended to provide flexibility to accommodate many types of projects.	

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264	Negrette, Michelle	Greater Central Ave.	1/17/17	On street parking and transit bonuses for parking made project work.	Noted. The IDO standards associated with PT are intended to encourage transit-oriented development.	
265	Negrette, Michelle	Greater Central Ave.	1/17/17	Had to assume higher rents – lose 40%/year, 14% return.	Noted.	
266	Negrette, Michelle	Greater Central Ave.	1/17/17	Underground parking desired by neighbors made project numbers fail. ½ the rents needed for cost.	Noted. See Line 245.	
267	Negrette, Michelle	Greater Central Ave.	1/17/17	CPO lower density, maybe less development than appropriate on high-density corridor.	Overlay zones are used sparingly in the IDO for areas with significant architectural character, historic districts, and views. In these areas, more emphasis is placed on preservation than development to protect what is valued.	
268	Negrette, Michelle	Greater Central Ave.	1/17/17	Landscape requirements met by side setbacks. No meaningful landscaping on street. Require streetwise minimum.	See Line 247.	
269	Negrette, Michelle	Greater Central Ave.	1/17/17	Density definition, units may give false picture, (500 sf unit =6000 sqft) – what you count and how you count it – add in sf/unheated sf, etc.	Direction would be needed from decision-makers to remove density limits in Table 4-1-1 and 4-1-2 or to provide more nuanced definitions of density for different unit sizes.	
270	Negrette, Michelle	Greater Central Ave.	1/17/17	5 foot setback is required no matter what, may not match character.	Staff believes this comment refers to side setbacks, as other setbacks vary from zone to zone.	See Line 147.
271	Negrette, Michelle	Greater Central Ave.	1/17/17	Allow landscape requirement to count if on roof in urban areas.	Section 4-6.3.B.1 specifies that within DT, landscaping requirements need not be planted at the ground level. Direction from decision-makers would be needed to extend this provision to UC-MS-PT and possibly other Activity Centers. See also Line 247.	
272	Negrette, Michelle	Greater Central Ave.	1/17/17	CPO gave advantages – no setbacks, higher building heights, but parking requirements killed \$ based on boutique hotel.	It is unclear which CPO is being referenced. See Lines 245 and 253 for hotel parking.	See Line 245.

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273	Negrette, Michelle	Greater Central Ave.	1/17/17	Parking is driving the design, suggest no min, max requirements only.	See Line 245. Parking minimums provide some assurance to nearby residents and business owners that spillover impacts will be minimized. Parking maximums are intended to restrict parking more than what the market prefers to provide, which seems to run counter to the need to provide feasible standards for high-quality development. If parking maximums are set higher than the market prefers, there is little reason to regulate parking at all.	
274	Negrette, Michelle	Greater Central Ave.	1/17/17	1 parking space/room for hotel seems high.	See Lines 245, 253, and 274. More information is needed about an alternative standard that would be more reasonable.	See Line 245.
275	Eyster, Gary		1/18/17	CHARACTER PROTECTION OVERLAY ZONES...Nob Hill Highland- CPO-5...Applicability Area...The CPO-5 standards apply in the mapped area shown... (map runs from Girard Blvd to Washington St)...The mapped area does not include any of Highland. Don't you want the name of the CPO to match the area it covers?		On page 78, Section 2-7.2.B.5, change the name of CPO-5 to "Nob Hill."

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276	Eyster, Gary		1/18/17	<p>BUILDING HEIGHT, MX-M ZONE, CENTRAL AVE FROM GIRARD BLVD TO ALISO ST...The draft proposes that Building Heights will be governed by the city wide standard for MX-M, 45 feet....The draft states: "Bonuses associated with Premium Transit are only available within one block of a Premium Transit Station".....This will allow another 20 feet of building height in these areas (65 ft). The community hammered out a 39 foot building height through the sector plan process in 2007. Neighbors gave a lot so others could get the heights up to 39 feet...I appreciate the desire to make standards consistent citywide but the purpose of a CPO is to recognize unique character that is worthy of preservation and preserve it.</p> <p>Building height in the CPO-5 zone between Girard Blvd and Aliso St should remain 39 ft and bonuses should not be available. The district creates city wide value from its historic character. Its historic character derives to a major extent from the heights of buildings being somewhat consistent with building heights during the historic period of significance.</p>	See Lines 82, 95-97, 140, 142, 152, 232, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	

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277	Eyster, Gary		1/18/17	CARPORTS...The draft states: "Carports for single family, two family detached dwellings, and attached townhouse dwellings are prohibited in the following mapped areas. (map of Monte Vista and College View Historic District)...This mirrors the current ordinance and I support it in the strongest terms. I would recommend making it larger, say the Nob Hill Highland Sector Plan area. I note that there are several three family dwellings in the mapped area. The language needs to cover them and perhaps it does.	Section 4-5.6.B.1.b that starts on page 221 prohibits carports for single-family, two-family detached, and attached townhouse dwellings. If the "three family dwellings" are attached townhouses, then this prohibition would apply. The ABC-Z process is intended to carry over adopted provisions for small areas but not to change the boundaries of where they apply. There is also a citywide standard in Section 4-1.3, Table 4-1-1 for the R-1 zone that garages or carports have a minimum setback of 20 ft., 5 feet beyond the 15-ft. minimum setback for the building. See also Lines 145, 296, 325-326, and 341 for carports.	On page 166, revise Table 4-1-1 to remove reference to carports. Add provision for 20 foot setback to R-T for garages.
278	Eyster, Gary		1/18/17	FENCE AND WALL STANDARDS...The drawing "In front of the primary building front façade" should probably refer to the front setback, 20 ft from the front property line, instead of in front of the primary building façade. It should show wall height of 36" max, not 42" max. The 36" max wall height is not high; why not allow max opacity of 100%?...Wall height behind the front setback should be 6 ft unless owner has an engineer's design, then 8 ft. max.	This comment refers to a graphic on page 250 in Section 4-6.9. The International Building Code requires an engineer to design walls over 6 ft. As this is not a zoning standard, staff does not recommend adding that language to the IDO. This prevents conflicts if/when the Building Code is updated, which happens periodically.	On Page 250, revise graphic illustration to reflect the correct 36" wall height and remove reference to opacity in graphic. On Page 242 remove graphic and replace with a graphic that better illustrates the policies in Section 14-16-4-6.5.B.

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279	Eyster, Gary		1/18/17	<p>The draft states: "WALLS, FENCES, AND RETAINING WALLS GREATER THAN THREE FEET are not allowed in the front setback area of parcels with single family detached dwellings, two family detached dwellings, and attached townhouse dwellings in the mapped areas shown. (map of Monte Vista and College View Historic District)....This mirrors the current ordinance and I support it in the strongest terms. I would recommend making it larger, say the Nob Hill Highland Sector Plan area. I note that there are several three family dwellings in the mapped area. The language needs to cover them and perhaps it does.</p>	<p>Section 4-6.9.B.6 on page 251 prohibits walls above 3 feet in the Monte Vista and College View Historic District to carry over the provision as adopted in the Nob Hill Highland Sector Plan. ABC-Z is not intended to change the boundaries of where these mapped provision apply. Staff would need direction from decision makers to expand the area where this provision applies.</p>	
280	Michie, Susan		1/18/17	<p>Below is the quote I referred to at the meeting yesterday, the full report published Dec. 2016 is attached.</p> <p>"A substantial majority of Americans are online shoppers, but for most this behavior is a relatively infrequent occurrence. Some 15% of Americans say that they make purchases online on a weekly basis (4% do so several times a week, while 10% do so about once a week) and 28% shop online a few times a month. On the other hand, nearly six-in-ten Americans say they buy online less often than a few times a month (37%) or they never make any online purchases (20%)."</p>	<p style="text-align: center;">Noted.</p>	

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281	Michie, Susan		1/18/17	As for Hey Johnny - despite their lament about online shopping, if you go to their website you will see they promised an online shopping option in November, but chose not to do it. If you read the news article it also states....Ford also cited a change in the Nob Hill area itself. He said the area has become more for breweries and restaurants rather than retailers.	Noted.	
282	Michie, Susan		1/18/17	My point being there is still plenty of room to attract brick and mortar retail to Nob Hill if we provide an attractive environment for them. We are not doing that now. The 1965 rule that exempts all parking for any change in use benefits a few property owners at the expense of everyone else in the community, including local residents, businesses, and other property owners. Given the current revamping of the zoning code (IDO) now will be the best time to remedy this issue. It is not unfair to apply the new standard "change in use" parking policy below for all commercial buildings to pre-1965 buildings too.	The IDO carries forward regulations from adopted Sector Development Plans. Direction would be needed from decision makers to change the exemption currently granted by the Nob Hill SDP.	
283	Michie, Susan		1/18/17	3. A change in use of a primary building that complies with the requirements of Tables 4-5-1 and 4-5-2 before the change in use, and that increases the minimum off-street parking requirements for the building, by more than 25 percent. Changes in use that result in a smaller increase in off-street parking spaces shall not be required to provide additional parking. (See IDO p. 202)	See Line 282.	

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284	Michie, Susan		1/18/17	<p>Doing so could...</p> <ol style="list-style-type: none"> <li>1) Limit some new restaurant/bar activity, but not all</li> <li>2) Stop the upward rent creep, that works against retail</li> <li>3) Slow the agglomeration of alcohol outlets and related rise in violent street crime.</li> <li>4) Help to buffer existing restaurants/bars against coming changes in liquor policy (i.e. SB 37)</li> <li>5) Encourage a more diversified business mix to serve both local and visiting consumers.</li> <li>6) Still allow new options for "change in use" for pre-1965 buildings also enhanced by other new "parking credits and adjustments" in the IDO (See IDO p.217).</li> </ol> <p>There will be no better time than now to change this policy.....just my two cents.</p>	See Line 282.	
285	Davis, Calvin	Geltmore, LLC.	1/20/17	<p>This comment is a revision to the letter received 17 January 2017. The first part of the letter was repeated, and can be found in Lines 91-97. Lines 286-290 include only the additions made in the 20 January 2017 letter.</p>	See Lines 286-290.	

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286	Davis, Calvin	Geltmore, LLC.	1/20/17	<p>The suggestion we made above, related to increased building heights within 660 feet of Premium Transit stations, specifically in east Nob Hill between Carlisle and Washington, is made in the interest of regulatory consistency along the Premium Transit line and with the end goal of improving the long-term viability of local businesses in the area. The City recently commissioned the Gibbs Planning Group to perform a review of the IDO and make recommendations for changes that would better benefit retailers in the Nob Hill Highland Neighborhood. In their report, titled IDO Retail Review &amp; Recommendations - Nob Hill Highland Neighborhood published on December 5, 2016, the Gibbs Planning Group made several recommendations that echo our suggestion related to the Premium Transit bonus. Consider the following excerpts taken directly from the report (emphasis added):</p>	<p>See also Lines 225-236 for the full comments from Gibbs Planning Group.</p>	

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287	Davis, Kalvin	Geltmore, LLC.	1/20/17	Recommendation: Chapter 14-16-4-1.4 Mixed-Use District Dimensional Standards should eliminate maximum building height and instead limit the number of stories. Discussion: Modern retail development characteristically includes 14- to 18-foot floor to ceiling heights on the ground level, while office and residential heights can vary according to use and type. The current maximum may limit 4-story development. GPG recommends the IDO considers allowing 5-story development[...], as this represents the most efficient development under current building-type construction limitations.	See Line 232.	See Line 140.
288	Davis, Kalvin	Geltmore, LLC.	1/20/17	Consider conducting office and residential feasibility analyses. Urban retail is best supplied in mixed-use environments where a steady supply of consumers are living, working and playing nearby. Mixed-use development should be encouraged if not required. Furthermore, since the Great Recession, many retailers are more willing to explore proven or up-and-coming urban sites over suburban or speculative sites due to the more dense and consistent trade areas that urban locations command.	Noted. New Mixed-use zone districts is intended to encourage mixed-use development. It is unclear whether the request for office and residential analyses is to determine whether these uses should be allowed in the MX zones or just to study how likely these uses will be. Such studies might be more appropriate by Main Street organizations or Business Improvement Districts.	

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289	Davis, Calvin	Geltmore, LLC.	1/20/17	<p>Potential impact of transit-oriented development (TOD) on supporting retail: Investments in transit have a multiplier effect on private investment in the areas immediately adjacent to the proposed line. The guarantee of regular service and consistent supply of potential residents, workers and consumers provides developers with an added level of security in an otherwise volatile industry. Generally, retail within one-half mile of a transit stop will see improved visibility and sales after the opening of the transit line. These areas should be well-signed and pedestrian connections should be regularly maintained to encourage walkability. For-sale and for-rent residential within one mile of transit will be in demand, potentially spurring new or expanded development. Retailers often consider the residential density of prospective locations when making decisions on new store deployments.</p>	<p>Noted. The IDO is intended to provide flexibility to accommodate many types of projects and encourage transit-oriented development along Premium Transit corridors and walkability along Main Street corridors.</p>	

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290	Davis, Kalvin	Geltmore, LLC.	1/20/17	We urge the EPC Commissioners and City Council members to strongly consider our suggestion related to the Premium Transit bonus, as well as the recommendations of the Gibbs Planning Group report. Our suggestion, and the Gibbs recommendations, particularly the one related to maximum building height, are made in the interest of encouraging mixed-use, transit-oriented development and benefiting Nob Hill retailers. Increased building height is a critical component of mixed-use development. It would be extremely challenging, if not impossible, to finance a new mixed-use project that is three stories or less.	See Lines 82, 94-97, 140, 142,152, 232, 276, 309, and 311-315 for discussion of building heights in Nob Hill.	
291	Morris, Petra	LUCC Commissioner	1/27/17	For each of the HPO we include a link to the guidelines, we should also include the title of the document, in case the link goes down, gets scrambled, etc. People should know the name of the document that they are being linked to. For example HPO-2 would read: "The standards and guidelines applicable in the HPO-2 zone are found in the New Town Neighborhoods Development Guidelines, and are available online: link" --The New Town guidelines are applicable for Huning Highland, 4th Ward, and 8th and Forester, so it will be the same document title. Also we should consider referencing this for the proposed EDO HPO, as I think it applicable to that as well, but Leslie can probably speak to that better on relevance.		For each HPO, add the name of the document being linked to, as well as the online link.

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292	Morris, Petra	LUCC Commissioner	1/27/17	When a Landmark is adopted, it is usually adopted with its own standards and guidelines. On page 97, under C. add the following sentence: "The standards and guidelines applicable to each City Landmark are available from the Historic Preservation Planner." --I'm not sure if we want to put each Landmarks standards online, or direct people to the planner, but somehow we should indicate that they exist and are to be followed.		On page 97, under C. add the following sentence: "The standards and guidelines applicable to each City Landmark are available from the Historic Preservation Planner."
293	Morris, Petra	LUCC Commissioner	1/27/17	On page 333, in the box next to 5-5.1. remove the reference to the Zoning Enforcement Officer. This is something that is the responsibility of the LUCC planner. This will make the box consistent with the text and will avoid ambiguity in the future.		On page 333, in the box next to 5-5.1. remove the reference to the Zoning Enforcement Officer.
294	Silbergleit, Beth; Trujillo, Dennis		2/25/17	We are writing to you today as we will be unable to join you for the scheduled meetings on the next two Mondays. We have lived in the Monte Vista subdivision since 2000 and our home on Bryn Mawr N.E. is a contributing property to the historic district.	Noted.	
295	Silbergleit, Beth; Trujillo, Dennis		2/25/17	Professionally, as a former assistant NM State Historian (Dennis) and as archivist at the Center for Southwest Research (UNM) and former Nob Hill Neighborhood Association board member (Beth), we are committed to maintaining the historic character of the entire Nob Hill area.	Noted.	

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296	Silbergleit, Beth; Trujillo, Dennis		2/25/17	We are particularly pleased to see the CABQ Integrated Development Ordinance contain sections 4-5.6 prohibiting carports and section 4-6.9 prohibiting walls and/or fences higher than 3 feet in the front setback for single family, two family detached dwellings, and attached townhouse dwelling in the Monte Vista and College View Historic District. These provisions will help ensure that the historic streetscape in our neighborhood is maintained. Additionally, considering Albuquerque's increase in criminal activity, it is important to keep as many eyes on the street as possible. Lower walls help do this. Perhaps extending these regulations to the rest of Nob Hill should also be considered.	See Lines 145, 277, 325-326, and 341 for carports. See also Line 282.	
297	Silbergleit, Beth; Trujillo, Dennis		2/25/17	Thank you for your continued good work. ¡VIVA NOB HILL!	Noted. The project team is thankful for the participation and engagement from community members.	
298	Jaramillo, Jaime	WALH	3/13/17	The purpose of this memo is to (1) summarize the City of Albuquerque Planning Department responses to our questions during our meeting on February 6, 2017 regarding the IDO, (2) provide a draft WALH response to those responses, and (3) obtain approval to submit formal comments for staff and EPC consideration. The memo is organized into two topic areas; Planned Community Zone and Uses and Standards.	Noted. See Lines 299-307.	

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299	Jaramillo, Jaime	WALH	3/13/17	<p>Planned Community Zone: Comment: Page 55: "Because of their large size, projects in this district include new traffic networks and infrastructure construction, are anticipated to impose significant impacts on the community and require additional study and analysis to document and mitigate those impacts." – This statement is unnecessarily negative insinuating that Master Planned areas may inflict harmful or damaging impacts on the community, which is not the intent of Master Planned communities and should not be the purpose of the PC zone. Would the team consider rewording this? Proposed Language: We propose the following language: "Because of their <del>large</del> size, projects in this district <u>will include new and expanded transportation traffic</u> networks and infrastructure construction, are anticipated to <u>accommodate future growth within</u> <del>impose significant impacts on the community,</del> and <u>this growth may</u> require additional study and analysis <del>to document and mitigate those impacts.</del>"</p>		Because of their large size, projects in this district will require additional study and analysis to document potential impacts on the community and mitigate them via new and expanded transportation networks and/or infrastructure."
300	Jaramillo, Jaime	WALH	3/13/17	<p>WALH Comment: Are the Planned Communities Criteria remaining in effect? Planning Staff response: The PCC was not analyzed in the IDO transition process. This will be considered further. WALH response: Agree with this, but reiterate that this is our understanding.</p>	The Planned Communities Criteria document is adopted by both the City and County and will remain in effect. Staff is taking another look at the PCC in light of the PC language in the IDO and may propose changes in the future but have no recommended changes at this time.	

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301	Jaramillo, Jaime	WALH	3/13/17	<p>WALH Comment: Page 55: "Permitted and conditional uses are negotiated on a case-by-case basis but may not include any use that is not included in Table 3-2-1 (Permitted Use Table)." – Due to the IDO's reorganization/reclassification of uses that are in the current Zoning Code, what is the anticipated solution to any discrepancy in uses listed in the current code, which may fall into another category and/or may not be listed at all in the IDO Permitted Use Table? This relates to our later discussions in Agenda items 2-4.</p> <p>Planning Staff response: Please submit a list of uses allowed in each zone during the IDO Phase II process. We commit to add something to mitigate any of these issues to the enactment ordinance.</p> <p>WALH response: Agree with this, but reiterate that this is our understanding.</p>	<p>Approved site plans and master development plans will continue to remain valid after the adoption of the IDO. See Lines 9, 61, 86, 100-102, 105, 107, 121, and 136.</p> <p>See Section 3-1.3 Unlisted Uses for how unlisted uses will be handled in the future. Beyond these provisions, the adoption of the IDO may change allowable uses on properties throughout the City, which is within the land use and zoning power of the City.</p>	
302	Jaramillo, Jaime	WALH	3/13/17	<p>WALH Comment: Page 57: "No phase of a Planned Community may develop more than 80 percent of the land area designated for residential or mixed-use development as single-family detached dwellings." – We are unsure what the intent of this statement is. Could this be problematic for the undeveloped PDA portion of Westland being that it is anticipated to be built out with single family homes?</p>	<p>This provision is intended to ensure a mix of uses on vast tracts of land that come in. It is difficult if not impossible for the City to enforce a mix of uses over many phases. This provision is intended to affect phasing so that each phase includes some non-residential and some residential uses, which will help maintain or improve the jobs-housing balance, particularly on the City's edges, where the PC zone will provide the accommodate the majority of future greenfield growth.</p>	
303	Jaramillo, Jaime	WALH	3/13/17	<p>Uses and Standards: Generally, we believe that the following conversions are problematic because several uses are lost in the conversion.</p>	<p>See Lines 304-307.</p>	

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304	Jaramillo, Jaime	WALH	3/13/17	<p>WALH Comment: Westland SU-2 for Town Center. This zone is made up of C-2 permissive uses and R-2 permissive uses (excluding uses in R-T, R-LT, and R-1). The conversion from C-2 in this part of the City is NR-C (Non Residential Commercial). The primary issue with this conversion is that this area is intended to be a high intensity, mixed use zone, which is not allowed as the IDO is currently proposed. The differences between what is allowed under C-2 today and what is proposed under NR-C is the following:</p> <ol style="list-style-type: none"> <li>1. Club (nightclub) was a permissive use and is proposed to be prohibited.</li> <li>2. R-3 residential uses were permissive (provided certain design standards are met) and are now prohibited.</li> <li>3. Golf driving range, miniature golf course, and baseball batting range were permissive uses and are now conditional.</li> <li>4. Stand or vehicle selling fruit, vegetables, or nursery stock was a permissive use and is now prohibited.</li> </ol>	<p>See Line 301. As noted in the comment, some uses change in the converted zones. This area is proposed to be zoned as PC, which means that the adopted Westland Master Plan will remain on the books as the governing land use document for the area. This zoning conversion approach was agreed upon as the way to best preserve the existing entitlements and responsibilities from the adopted plan. The Westland Master Plan references R-2 and C-2 permissive uses. Section 1-10.3 states that Master Development Plans remain valid. Section 1-10.4 states that Master Development Plans that reference zones prior to the IDO will be administered per the relevant conversion zone in the IDO per table 2-2-1.</p>	

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304 (cont'd)	Jaramillo, Jaime	WALH	3/13/17	(cont'd)	Staff believes that the IDO conversion zones will allow the area to develop as a moderately-high density mixed use area but may result in changes to individual uses. On the West Side, C-2 converts to NR-C to address the imbalance of jobs and housing on the West Side and ensure land for jobs and services. The biggest change noted is from a zone that allowed residential uses to one that intentionally does not. The Westland Master Plan could be amended to specifically allow uses that would change under the IDO conversion zones.	
305	Jaramillo, Jaime	WALH	3/13/17	<p>WALH Comment: Westland SU-2 for Planned Development Area. This zone is made up of R-T permissive uses. The conversion from R-T is (IDO) R-T. The differences between what is allowed under R-T today and what is proposed under the IDO R-T is the following:</p> <ol style="list-style-type: none"> <li>1. Family day care use was permissive and is proposed to be conditional.</li> <li>2. School was a permissive use and is proposed to be conditional. APS currently owns a 110-acre property in this zone and a new K-8 school is proposed for construction this summer. The schools are shown on the approved Land Use Plan.</li> </ol>	The IDO changes these uses as the commenter notes, through the PC zone mapped for this area. The SU-2/PDA zone in the Westland Master Plan only includes "Uses Permissive in the R-T zone," but does not reference uses that are conditional. Therefore, those uses would not be allowed after the IDO is adopted. See Line 301 and 304. APS generally is not subject to the City's zoning standards.	

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306	Jaramillo, Jaime	WALH	3/13/17	<p>WALH Comment: Westland SU-2 for Town Center Village. This zone is made up of C-1, R-2, R-T, and R-LT permissive uses. We are only concerned about the C-1 conversion: MX-L. The differences between what is allowed under C-1 today and what is proposed under the MX-L is the following:</p> <ol style="list-style-type: none"> <li>1. Church, or other place of worship was a permissive use and is proposed to be conditional.</li> <li>2. Club (nightclub) was a permissive use and is proposed to be prohibited.</li> <li>3. General retail was permissive in any size and is proposed to be limited to under 10,000 square feet. Restricted retail size is a concern within all mixed use zones (including our proposal in the next section related to MX-H).</li> </ol>	<p>Religious institution is a permissive use in all the MX zones. In general, the MX-L zone is the conversion for C-1 and is meant to provide neighborhood-serving commercial activity. The limit on retail to 10,000 square feet indicates a limit related to neighborhood-serving retail. See Lines 87, 89, 90 108, 186, 189, 305, and 307.</p>	

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306 (Cont)	Jaramillo, Jaime	WALH	3/13/17	<p>4. Gasoline, oil, liquefied petroleum gas, including outside sales (gas station) was a permissive use (provided certain design standards are met) and is proposed to be prohibited.</p> <p>5. Car washing was a permissive use and is proposed to be conditional.</p> <p>6. Games, electronic and pinball was a permissive use and is proposed to be conditional.</p> <p>7. Medical or dental laboratory was a permissive use and is proposed to be conditional, and will only be allowed conditionally if the site and/or building is vacant for five or more years.</p> <p>8. Private Commons Development (cluster housing) was a permissive use and is proposed to be prohibited.</p>	<p>In the existing Zoning Code, gas stations were a Conditional use in C-1, which has proven problematic, since properties zoned C-1 are in such close proximity to residential zones and pose a potential negative impact. The IDO prohibits gas stations in C-1 but allows them in the conversion for C-2 - MX-M - which is intended for community-serving commercial uses. In general, the IDO is a significant departure from the pyramid structure of zoning, where uses build in the higher zones and allow the mix of all uses permissive in lower zones. The pyramid structure allows single-family in the same zones as non-residential uses and higher-density residential uses. These mixes tend to result in poor outcomes for single-family neighborhoods, where the most protections are wanted and needed from more intense activity. For this reason, the IDO disallows single-family homes from the MX zones; conversely, private commons development is also prohibited. The MX zones are intended for higher-density and higher intensity uses, both of which prove to be bad neighbors for single-family homes.</p>	

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307	Jaramillo, Jaime	WALH	3/13/17	<p>WALH Comment: General Retail</p> <p>We are particularly concerned with the retail provisions proposed in the IDO. The large retail category should have a threshold of 75,000 square feet, like today's standard and to allow grocery stores to be categorized in medium retail. Also, very concerning is the downzoning which will occur in many zones if the retail provisions are adopted as is. Retail uses are not categorized by size now and are allowed in a wide variety of zones that way in the current code. It is our recommendation that the retail provisions for size and location in each zone are revisited.</p>	<p>Existing uses that are legal remain legal after the IDO is adopted. The City is within its land use and zoning authority to adopt new legislation with new zones and new standards. The IDO provides the opportunity to rethink what zones are needed in Albuquerque and what uses should be allowed in each. This change represents a huge departure from the pyramid structure of zoning in today's Zoning Code to a new structure that provides the ability to determine which uses should be allowed in each zone. As such, the new zones and conversions from existing zones result in some change of uses. See also Lines 87, 89, 90 108, 186, and 189.</p>	
308	Landgraf, Gerald	Nob Hill Development Corporation	3/13/17	<p>I am a property owner of several developed and undeveloped properties in the east Nob Hill area and support the City's effort in updating the zoning code through the Integrated Development Ordinance and their combined effort with the County in completing the revised Comprehensive Plan.</p>	<p>Noted. Staff appreciates all of the public input that has contributed to the draft IDO up to this point.</p>	

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309	Landgraf, Gerald	Nob Hill Development Corporation	3/13/17	The integration of the proposed IDO zoning with goals outlined in the Comprehensive Plan related to land use regulations, transportation, housing, and jobs will connect them in a thoughtful manner, with an eye towards accommodating future growth. The creation of the mixed-use zoning categories, in combination with height bonuses made available to development projects in appropriate locations like near Premium Transit, Urban Centers, Main Streets, and Downtown represents the best in current techniques of land use, transportation, and housing planning. The most thoughtful bonus criteria, which best aligns the goals of the Comprehensive Plan with the zoning and supports the future growth of the City, is the Premium Transit bonus.	Noted. See Lines 82, 95-97, 140, 142, 152, 232, 276, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	
310	Landgraf, Gerald	Nob Hill Development Corporation	3/13/17	New mixed-use residential/commercial projects in the applicable bonus areas will create much needed housing near to jobs and transportation, reducing those individual's vehicle miles traveled and helping to normalize the City's jobs/housing balance. I believe that mixed-use projects that create new housing and commercial space near Premium Transit, Urban Centers, Main Streets, and Downtown will be of a great benefit to the City. I support the City's effort to encourage these types of projects and I believe that the more housing that can be added to these areas the better.	Noted. The IDO is intended to accommodate many types of projects and encourage transit-oriented development along PT corridors and mixed-use development in Urban Centers, Main Streets, and Downtown.	

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311	Landgraf, Gerald	Nob Hill Development Corporation	3/13/17	Having experienced failed attempts at developing my properties in Nob Hill, I recognize the benefit of development height bonuses, and having recognized that, I do not believe that development height bonuses should be limited in the mixed-use zoned areas. While reviewing the IDO draft prepared for the EPC I noticed that the Nob Hill CPO section on building standards and building heights [section 2-7.2(5)(d)(i)(b)] has limited the ability of properties to qualify for development height bonuses. I believe that limiting development height bonuses in areas where they should be applicable is contrary to goals outlined in the Comprehensive Plan. The Planning Department, the EPC commissioners, and the City Councilors should act to modify this section of the Nob Hill CPO.	Noted. See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 312-315, 327-331, and 337-340 for discussion of building heights in Nob Hill. Direction would be needed from decision-makers to modify the Nob Hill CPO.	

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312	Landgraf, Gerald	Nob Hill Development Corporation	3/13/17	<p>The most thoughtful bonus criteria, which best aligns the goals of the Comprehensive Plan with the zoning and supports the future growth of the City, is the Premium Transit bonus.</p> <p><i>Therefore, the Premium Transit bonus should be applied normally within the Nob Hill CPO (i.e. within 660 feet of a station) instead of the vague "within one block" as it is currently written. At the minimum, the Premium Transit bonus should be applied normally to the east of Carlisle while retaining the "within one block" language for the historic area between Girard and Carlisle. All other bonuses to development heights should also be available to properties to the east of Carlisle.</i></p>	See Line 311.	
313	Hufnagel, Tandi		3/17/17	<p>I wrote to Pat and the Nob Hill newsletter to voice my concern over the "bonus" building height allowances within one block of the new ART stations in Nob Hill. From what I understand, that bonus has not been added at the Bryn Mayr station, but is at the Solano Station.</p>	See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	

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314	Hufnagel, Tandi		3/17/17	I would like to point out that there is some misinformation out there. We are hearing planners and others suggest that the historic core of Nob Hill runs from Girard to Carlisle when, in fact, studies during the Sector Plan work in 2007 clearly defined the historic core as Girard to Aliso. Attached are allowable building heights from the sector plan showing that they are the lower 39 ft. up to Aliso. So the new 45 ft. proposal, with an additional 20 ft bonus height near stations, would take the limit to 65 ft near the Solano station, which is within the historic core of Nob Hill.	The Nob Hill CPO is mapped with Aliso as the eastern boundary of lower Nob Hill, as the Sector Plan showed. The IDO would currently allow addition height near both the Bryn Mawr and Solano transit stations in lower Nob Hill as currently written. See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	

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315	Hufnagel, Tandi		3/17/17	This is of great concern to the NH residents, as seen in the big response to my original message, below. The surrounding buildings are almost all one story - a five story building would stand out in a very negative way, would block the views that neighbors south of Central enjoy of the mountains, and would loom over Central itself. Three stories is the most that should be allowed in the historic neighborhood. This would preserve the architectural texture, maintain the "big sky" character of old Rte 66, feel appropriate to the scale of surrounding buildings, and prevent any tunnel effect on Central.	The IDO would generally allow 65 feet along Central, designated as a Main Street corridor in the Comp Plan. In recognition of the existing Sector Plan limits and the policies that recognize the character of lower Nob Hill, the IDO limits the Premium Transit building heights to within one block and does not apply Main Street building heights from Girard to Aliso. From Aliso to Graceland, PT building heights apply within 660 feet of transit stations, but Main Street building heights do not apply. There are competing policy interests within Nob Hill: preserving character and encouraging transit-oriented development associated with Premium Transit stations. The IDO attempts to balance those competing priorities in a way that poses minimal negative impacts to lower Nob Hill. Direction would be needed from decision-makers to change the CPO standards for Nob Hill. See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	See Line 140.
316	Hufnagel, Tandi		3/17/17	I know that you are nearing the end of the planning stages, but please, consider that the neighborhood very strongly does not want buildings over three stories in Nob Hill. 45 feet should be the maximum allowed height near the Solano station.	See Line 315.	

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317	Hakim, Besim,		3/17/17	The general impression is that the IDO is an exercise in consolidation of the existing numerous documents into a more compact format so that users can find everything that is relevant in one place. In most cases the identification (name) of zone is new to comply with the general grouping of Residential, Mixed-use, and Non-residential.	Agreed. This is the overriding impetus for the Integrated Development Ordinance.	
318	Hakim, Besim,		3/17/17	The other general impression is the IDO does not depart from the contents and type of coding system that currently exists. No alternative coding mechanisms is evident in the document. It is suggested that existing standards be evaluated to determine if they should continue to be used, or revisions and improvements are necessary.	[Please note that the reviewer is looking at Module 1 - released in October 2015.] The use table is a significant change from the existing zoning code. The consultant for the IDO - Clarion Associates - read the existing Zoning Code, Subdivision Ordinance, Development Process Manual, Planning Ordinance, and adopted Sector Development Plans and has carried over many provisions that are still enforceable and effective. See footnotes throughout the IDO.	
319	Hakim, Besim,		3/17/17	It is also suggested that the IDO include a section on repairing and improving existing sprawled neighborhoods. There are numerous methods of achieving that as shown by examples in the book <i>Sprawl Repair Manual</i> by Galina Tachieva, published in 2010.	More information is needed about what should be adjusted in the IDO.  The Comp Plan has significant guidance on where additional density is desired, such as Centers, Corridors, and Areas of Change. The IDO includes several tools to allow for densification in areas consistent with the updated Comp Plan.	Add to the Table of Contents a list of provisions specific to Downtown (DT), Urban Centers (UC), Activity Centers (AC), Main Street Corridors (MS), and Premium Transit Corridors (PT).

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320	Hakim, Besim,		3/17/17	Re graphics: all aerial axonometrics should be replaced with actual air photos of typical existing areas within Albuquerque, or examples from other cities. This will communicate better the character of each zone. Some of the axonometrics, as shown in the draft of Module 1, do not inform or relate to the District Standards sketches on the opposite page.	The drawings illustrating each zone district have been adapted from aerial photography of Albuquerque areas that seem to illustrate the intent of each zone. More information is needed about how these could be adapted to be more informative.	
321	Hakim, Besim,		3/17/17	As for District Standards graphics: more than one sketch is needed to show other possible permutations. The intent behind the numeric standards shown in each sketch should be explained so that they do not convey arbitrariness.	The illustrations are meant to illustrate the definitions of dimensional standards, not regulate design itself. More than one illustration might make a reader assume those were the only permutations allowed, whereas one drawing is more certainly to be interpreted as an illustration only.	
322	Hakim, Besim,		3/17/17	The District Standards use of setback and height requirements are too specific and extreme. Introduction of performance and site contingent conditions will allow sensitive response to unforeseen special site conditions. These might also be communicated with generic sketches.	Variances and administrative deviations are intended to provide flexibility to address site contingent conditions and allow sensitive response. Standards are provided as requirements in order to result in predictable outcomes for neighbors and property owners and objective standards that can be administered and enforced by staff.	
323	Hakim, Besim,		3/17/17	Sections 4.1 to 4.10 are not yet available. These might clarify how local applications might be tailored to specific site conditions.	See EPC draft of the IDO, which includes standards for developing next to sensitive lands, Major Public Open Space, acequias, arroyos, etc.	

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324	Hakim, Besim,		3/17/17	<p>From the box on the cover of Module 1 document: What will the IDO do?</p> <ul style="list-style-type: none"> <li>- Integrate land development regulations and procedures in one place (This seems to be undertaken).</li> <li>- Simplify the City's current rules and procedures (No evidence that this is forthcoming, or introducing innovative alternatives).</li> <li>- Help implement the Comp Plan that is currently being updated (Wait and see to determine effectiveness).</li> </ul>	<p>See EPC draft of the IDO, which includes Chapter 5 Administration and Enforcement. Table 5-1-1 lays out all development processes and requirements. The IDO helps to implement the Comp Plan in terms of protections for neighborhoods (Section 4.8) and Open Space (Section 4-2 Site Design and Sensitive Lands), etc. Additional building heights and reduced parking requirements in DT, UC, MS, and PT areas are a direct tie to the Comp Plan, encouraging development within Centers and along Corridors.</p>	
325	Eyster, Gary		3/20/17	<p>4-5.6 B 1, page 221, CARPORTS, the draft states: no building wall may be built within any required setback area.</p> <p>It seems clear that it means one cannot construct a "wall" of a carport in a front or even a side or rear setback. I would love to think that it also meant a "very short wall" or what you and I would probably call a post....no vertical element... This would effectively keep carports out of setback areas which would be a huge benefit to ABQ. People could still build them beside their house behind the front setback.</p>	<p>It appears that this comment is asking if a structure post would be considered to be a wall, and therefore be prohibited. Structure supports would not be considered walls, and therefore are allowed in setback areas. For prohibitions on carports themselves, see Lines 145, 277, 296, and 341.</p>	

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326	Eyster, Gary		3/20/17	If it is to be left as “no building wall” you would have to define when a post becomes a wall. Structurally speaking a post wouldn’t need to be over 4” if it’s steel or 8” if it’s wood to support a carport (with shear bracing at the connection to the roof structure). I might suggest that a wall is a structure with any horizontal dimension greater than 12”??? That would be an improvement over current ordinances.	See Line 325.	
327	Michie, Susan		3/20/17	My comments refer the following policy in the Nob Hill CPO-5 p. 79 of the IDO (Section: d.i.b) b. “On properties abutting Central from Girard Blvd. to Aliso Ave., height and density bonuses associated with the Main Street designation or Workforce Housing are not applicable. Bonuses associated with Premium Transit are only available within one block of a Premium Transit station.”	See Lines 328-329 for responses to comments related to building heights in Nob Hill.	
328	Michie, Susan		3/20/17	This policy means that 65’ tall buildings would be allowed within one block of a Premium Transit (PT) station. Please note several historic buildings are within the one block area of a PT station in Nob Hill and thus, vulnerable to demolition under the ABC-to-Z policies for the new Comp Plan and IDO. Including... <i>[Comment includes photos of these locations]</i> FORD MOTOR COMPANY BUILDING – NOW KELLY’S, MONTE VISTA FIRE STATION BUILDING – CONTINUED ON NEXT PAGE.....	Noted. See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	

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329	Michie, Susan		3/20/17	1) Allowing 65-foot building heights within one block of the Bryn Mawr transit station location is very undesirable for the community as this area contains some of the most characteristic and historic buildings, including the Monte Vista Fire Station, Kelly's (Ford Motor Building), and the entire commercial strip west of Nob Hill "The Place". In addition, some of the commercial property on the east side of this station area is directly adjacent to R-1 residential zoning with no MX-T buffer. Thus, the potential for a 65' tall building to adversely affect properties that are held by zoning and character protections to single stories is greater than in other areas of the city.	Noted. See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	
330	Michie, Susan		3/20/17	2) The proximity of the Nob Hill commercial district to a major institution (UNM) has already created a "high density" area. We are one of the most diverse, high density, areas of the city in terms of demographics, income, and housing, including supportive group and community housing. UNM recently added 800 new living units to this area. We can support BRT in Nob Hill without adding incentives for more density that is likely to undermine future student housing on campus. On campus student housing encourages students to live on campus, where security and support are at a premium.	Noted. See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	

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331	Michie, Susan		3/20/17	3) We have consistently asked the city to respect the building heights between Girard and Aliso in our Sector Plan (39' or 3 stories) that was updated in 2014 with much input from the community. Community members have already compromised on this issue by agreeing to higher building heights from Aliso to Graceland (which allows the Premium Transit bonus of 65' within ¼ mile of a PT station, plus an additional 12' for the Workforce Housing bonus). The area between Girard and Aliso has a history of being limited to 3-story buildings and changing that seems grossly unfair to existing housing development that invested in our area in recent years on that premise.	Noted. See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill. The proposed building heights in the CPO do represent a concession to building heights established by the Nob Hill Sector Plan. As noted above, decision-makers must weight the competing priorities of preservation of character and encouragement of transit-oriented development. The IDO is one attempt at striking that balance. In general, the City is within its land use and zoning authority to change zoning and associated standards over time.	See Line 140.

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332	Michie, Susan		3/20/17	<p>In general, I believe the UC-MS-PT credits/bonuses for building heights, parking requirements, landscaping requirements, etc. are even more confusing than the Sector Plans they are replacing. In addition, they are not represented in the zoning maps that compare the old and new zoning codes. Thus, the public is being misled by the new zoning maps and the city planners' claims that our zoning codes are not being substantially changed.</p>	<p>The IDO does represent a significant change from the existing zoning framework that many have come to know well. Going from very tailored requirements for a particular area in a plan for a small area to one document that tries to standardize approaches to providing protections and incentives in appropriate areas for the whole city is quite a challenge. The table of contents for mapped areas has been added to help people understand special rules in special areas. Interactive online maps will also help demonstrate where specialized rules apply. In general, the IDO provides a tool that can address the special needs of an area while still addressing the entire City, which was the intended outcome. While standards for zones are changing in the IDO, the zoning conversions from existing zones to a new set of IDO zones is trying to match bundles of permissive uses as closely as possible. Where possible, standards for mapped areas are being carried over as closely as possible, while weighing the competing interest to standardize approaches where possible. This is all a balancing act, and decision-makers have discretion to adjust the IDO as necessary to strike a better balance.</p>	

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333	Michie, Susan		3/20/17	At the beginning of the ABC-to-Z process the consultants hired by the city promised that Sector Plan policies that could not be merged across the city would be honored. The Central Good to Great consultants also recommended that the building heights in Lower Nob Hill be limited to 3 stories. Nob Hill residents work harder than most communities to preserve and promote our history and cultural background - please don't undermine that work by allowing buildings that have little or no potential to contribute to the existing character and culture of our community.	The CPO for lower Nob Hill generally allows 45 feet, assumed to result in 3 stories. See Line 232 for comments related to adding story limits in addition to height limits. See also Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	See Line 140.

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334	Weir, Greg	Nob Hill NA	3/19/17	<p>At our regular Board meeting on March 6th, 2017, the Nob Hill Neighborhood Association considered a number of statements on the Integrated Development Ordinance EPC Draft dated December 29, 2016. While there is much the Board likes in the draft, the Board is greatly concerned with some details in the IDO that would, if passed as written, detrimentally affect our neighborhood. The Board considered some of the most problematic sections and voted on specific changes to four clauses of the IDO text as well as the reasoning for such changes, as detailed in the attachment. The Board voted in favor of all the changes; the votes were, in order of the statements in the attachment, 11-1-0 (11 in favor, 1 opposed, 0 abstained), 9-2-1, 12-0-0, and 10-1-1. There were a number of other statements that the Board did not have time to consider on March 6th; these will be discussed at our next meeting and communicated to ABC to Z project team and directly to the EPC.</p>	Noted.	
335	Weir, Greg	Nob Hill NA	3/19/17	<p>2-4.1: Mixed-Use Transition Zone (MX-T) C. District Standards i. For the Nob Hill Highland Area, as mapped below, the Building Standard for the Height, principal Building, max. ft. shall be 26 ft.</p>	See Line 143.	

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336	Weir, Greg	Nob Hill NA	3/19/17	Reasoning: The 2007 NHHSDP allows a maximum height of 26 feet, consistent with the original residential nature of the buildings in this zone in Nob Hill. (NHHSDP, pg. 89) The character of this neighborhood must be maintained, and the existing character (in particular the massing of buildings that defines the streetscape) is based on the 26 foot maximum height.	See Line 146.	
337	Weir, Greg	Nob Hill NA	3/19/17	2-7.2.B.5 Nob Hill Highland-CPO-5 Proposed language: d. Building Standards i. Building heights b: On properties abutting Central from Girard Blvd. to Aliso Ave., height and density bonuses associated with the Main Street designation, Workforce Housing, or Premium Transit are not applicable. <del>Bonuses associated with Premium Transit are only available within one block of a Premium Transit station.</del> i. For MX-M Zone Districts in this area, building heights in this area shall be restricted to 39 feet.	See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 338-340 for discussion of building heights in Nob Hill. Decision-makers should note that this would affect both the PT station at Bryn Mawr as well as the one at Solano Dr.	
338	Weir, Greg	Nob Hill NA	3/19/17	The community hammered out a 39 foot building height for this area through the sector plan process in 2007. (NHHSDP pg. 89) Neighbors allowed a lot so others could get the heights up to 39 feet from where they had been. The purpose of a CPO is to recognize unique character that is worthy of preservation and preserve it. The district creates city wide value from its historic character.	Noted. See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill.	

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339	Weir, Greg	Nob Hill NA	3/19/17	2-7.2.B.5. Nob Hill Highland-CPO-5 Proposed language: d. Building Standards i. Building heights c: On properties abutting Central from Aliso Ave. to Graceland Dr., bonuses associated with the Main Street Designation or Premium Transit do not apply. ii. For MX-M Zone Districts in this area, building heights in this area shall be restricted to 54 feet.	See Lines 82, 95-97, 140, 142, 152, 232, 276, 309, 311-315, 327-331, and 337-340 for discussion of building heights in Nob Hill. Note that the base height for MX-M is 45 feet. This would be a one-off difference in building height. From the perspective of consistency in the interest of enforceability, the City would prefer to default to the MX-M height of 45 feet or go to the MS height of 65 feet.	
340	Weir, Greg	Nob Hill NA	3/19/17	Reasoning: Addition of non-applicability of the Premium Transit station to this section clarifies how bonuses can be applied in this area. Typical Premium Transit bonuses are available within two blocks. Because a Premium Transit Station is located within one block of Aliso Ave., one could interpret the bonus to be available on the block between Aliso. and Morningside Ave. This language clarifies that this bonus would not apply on this block. The 54 foot height was agreed upon in the NHHSDP in 2007, pg. 89.	The IDO as drafted would not allow additional building height associated with PT between Aliso and Graceland, since it limits PT to within 1 block of the station, and there are no stations proposed between Aliso and Graceland. Building heights within this stretch would be limited to 45 feet unless someone wanted to do Workforce Housing, which would be eligible for a 12-foot bonus, getting building heights to 57 feet (i.e. within 3 feet of the Nob Hill Sector Plan height limit).	
341	Weir, Greg	Nob Hill NA	3/19/17	4-5.6.B.1 Carports Proposed language: b. Carports in the <i>front yard setback</i> for single-family, two-family detached dwellings <i>and attached dwellings, and townhouse dwellings</i> are prohibited in the following mapped areas.	See Lines 145, 277, 296, and 325-326 for carports.	

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342	Weir, Greg	Nob Hill NA	3/19/17	Reasoning: Addition of "townhouse dwellings" includes the 3 and 4 plex dwellings in the mapped area.	See Line 341.	
<b>Below are comments received during the review and approval process for the ABC Comp Plan that referenced the IDO.</b>						
a	Naranjo-Lopez, Loretta	MWG / ABQ Interfaith	9/14/16	There was no explanation of what the new zoning districts included from the old zoning district and how that would impact the neighborhood. The City Staff never explained as to how these new zone districts will preserve and protect the neighborhood culture, character and traditions.	Module 1, which describes zones, uses, and conversions from straight zones has been available since October 2015. A table of proposed conversions from SU-2 zones was also released with Module 1. An interactive conversion map showing how zones are proposed to change with the IDO has been available since May 2016. Dimensional Standards for each zone were released with Module 2 of the IDO in May 2016. Staff has made multiple public presentations when each Module was released, and offers office hours to walk through proposed changes with individuals and small groups, including the MWG on several occasions throughout the drafting process. Protections are established through overlay zones, use-specific standards, and dimensional standards, particularly Neighborhood Edge provisions (see Section 4-4.8).	

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b	Mexal, Catherine	Wells Park	9/19/16	<p>Attached please find petitions signed by residents of Wells Park to indicate their opposition to Wells Park's residential section being re-zoned to anything other than Single-Family Residential, as we are now. We are protesting our re-zoning to R-T which would allow high-density townhouses (26 ft tall buildings on 2,200 sq. ft., 22 ft-wide lots) throughout our neighborhood of bungalows. All these issues would be solved by re-zoning the residential portion of Wells Park R-1. [This comment includes a petition to convert the S-R zone to R-1 with 86 signatures].</p>	<p>The Sawmill/Wells Park SDP zones much of the single-family neighborhood as S-R (single-family residential). Despite the SU-2 zone name, the S-R zone allows townhouses permissively. The zoning conversions proposed for the IDO match permissive uses as closely as possible. The SU-2/S-R zone has been converted to R-T to reflect the permissive townhouse use allowed by that plan.</p> <p>The S-R zone establishes limits and standards related to townhouses that have been carried over in the CPO-7 Sawmill/Wells Park. Contextual standards in Residential zones are intended to ensure consistency between new development and the existing development pattern in Areas of Consistency. See Section 4-1.3.B. Changing zoning to R-1 would be a downzoning in this case, and the project is not intended to make discretionary zone changes from one set of permissive uses to another. There are many single-family neighborhoods with R-T zoning throughout Albuquerque. This mismatch between zoning and land-use can be tackled in a future stage of City-sponsored discretionary zone changes.</p>	

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c	Mexal, Catherine	Wells Park	9/19/16	This would also open the door for bail bond offices and 18-person group-type residential facilities in our residential area.	<p>Bail Bonds are currently considered Office uses under the existing zoning code and office uses are allowed in the R-T zone. The IDO moves bail bonds to be included in "Personal and business services," which are not allowed in R-T. See the definition of Personal and business services in Section 6-1 and the Permitted Use Table 3-2-1 in Section 3-2.</p> <p>In addition, the IDO has use-specific standards for bail bond services that further limit where bail bonds are allowed (see Section 3-3.4.V), including the introduction of a 1-mile distance separation for bail bonds.</p> <p>See Lines 5-7 for discussion of Community Residential Programs.</p>	
d	Mexal, Catherine	Wells Park	9/19/16	Please note that many residents stated that for years they have fought some of the proposed permissive uses from encroaching into the residential area of Wells Park and none of the above issues are permitted in the Sawmill-Wells Park Sector Development Plan, even though all sector plans were to be "integrated" into the Comp Plan/IDO.	See Lines 5-7. Neither bail bonds nor community residential facilities are prohibited in the Sawmill/Wells Park SDP.	
e	Thompson, Blake		9/26/16	Concerned that changes to setback, height, and other building standards will negatively impact property owners in the Volcano Cliffs SDP area.	More information is needed about what changes are problematic. The Volcano Cliffs SDP area is included in CPO-8 Volcano Mesa. The City has the authority to change zoning and dimensional standards as part of its land use and zoning powers.	

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f	Anchondo, Lucy	Avalon NA	11/4/16	We know that a significant amount of involvement from neighborhoods will be taken out of the process, from the get-go, as projects will be approved by the Planning Department in most instances, in a sort of "check-off list" method of approval.	<p>The IDO standards are intended to result in higher quality development and to be written more clearly to achieve predictable results for neighbors, developers, and staff. The IDO distinguishes among small projects that are appropriate for staff to review administratively, larger projects that require technical review by the Development Review Board, and discretionary decisions that need review by the Environmental Planning Commission. The vast majority of projects that the Planning Department reviews today do not go to the Environmental Planning Commission, which is where neighborhoods often participate in the review and approval process. For larger projects and discretionary decisions, neighborhood involvement is proposed to take place earlier in the development review process for individual projects through the requirement for applicants to meet with recognized neighborhood associations prior to submitting to the City. The intended effect is that neighborhoods have more opportunity than they do today to participate in the development process. The process to approve special exceptions through the Zoning Hearing Examiner is not proposed to change.</p> <p style="text-align: center;">See Line q and w.</p>	

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g	Anchondo, Lucy	Avalon NA	11/4/16	There will only be specific instances that that the neighborhoods will be involved.	See Line f. Table 5-1-1 indicates which approvals require a neighborhood meeting, which require a public meeting and/or hearing, and which are policy decisions. In general, there is a misperception that most development projects go to the EPC, and therefore that neighborhoods are involved. Less than 20% of development between 2008-2014 required EPC approval. Almost half went directly to building permit. The rest went to the DRB and then building permit. Because meetings with neighborhood representatives will be required for most projects that require DRB or EPC approval, the changes in the IDO may result in <i>more</i> involvement with neighbors, not less.	
h	Anchondo, Lucy	Avalon NA	11/4/16	When the Applicant is required to meet with the neighborhood, as part of the process, checking off requirements from the list, this will eliminate grounds of Appeal, unless the neighborhood can afford to hire an attorney.	See Line g. The higher-quality standards in the IDO are meant to require upfront the protections that are currently negotiated on a case-by-case basis at EPC for the ~16% of projects that require EPC review. This is intended to help provide protection for all neighborhoods, some of which currently don't have the capacity to attend EPC hearings now, much less for every development in their area. Every decision by the City can be appealed and typically requires hiring a lawyer.	

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i	Anchondo, Lucy	Avalon NA	11/4/16	Early meetings revealed to the public that, eventually, the EPC will also be eliminated from the process that it and the neighborhood are accustomed to having. We have since been informed that the neighborhoods and the EPC will still be involved, but it will be different and very limited.	See Line h. The EPC will still have purview over discretionary decisions. See Table 5-1-1.	
j	Anchondo, Lucy	Avalon NA	11/4/16	As we see things developing in this Plan, we know that there will be very few opportunities for the neighborhoods to participate.	See Lines f-h.	
k	Anchondo, Lucy	Avalon NA	11/4/16	The EPC's function will be greatly reduced and/or they will have a different role in the process, as the DRB will be the primary reviewing board.	See Lines h and i.	
l	Anchondo, Lucy	Avalon NA	11/4/16	Even though the DRB does have public hearings, they do not always notify us by mail, but rather by public notices, which the neighborhoods do not typically review on a regular basis, nor do we know the case numbers beforehand.	Table 5-1-1 indicates what type of notice is required for all decisions. Site Plan - DRB requires all notice as well as a neighborhood meeting.	
m	Anchondo, Lucy	Avalon NA	11/4/16	Once this Plan is approved, we would like to have new neighborhood notification policy implemented by the DRB, notifying the neighborhoods, by USPS mail and e-mail, before each and every hearing, involving the affected neighborhoods, since the DRB is a public hearing.	See Line l. DRB is a public meeting, not a public hearing.	

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n	Gallagher, Pat	La Luz Landowners Association	11/4/16	A not so subtle shift of power has been included in the IDO. This is the part where the great ideas in the plan become law. The Environmental Planning Commission is chartered to listen to the public. While this volunteer/appointed commission is generally populated by members of the development community, it has a tradition of acting fairly. Its job is to weigh the merits of a given development plan and make sure that the public has its say. Sometimes the public has a better grasp of a given ordinance than does the planning department or the EPC, so the process serves as a checks-and-balance cornerstone. The new IDO is attempting to change all that. To trigger scrutiny by the public through the EPC depends on how big or intrusive a development is to be. The new plan intends to increase the threshold in square footage of what the EPC will review. That means that fewer projects will trigger neighborhood notification.	See Lines f-m, q, and w. The EPC is chartered to make discretionary decisions about land use. The DRB is chartered to review technical compliance with regulations. The IDO preserves these roles. DRB projects also require notification.	
o	Gallagher, Pat	La Luz Landowners Association	11/4/16	Finally, the IDO is filled with vague language which will work against the public in a court of law. The IDO says that a development cannot have "significant (adverse) impact" on a neighborhood. This is a phrasing that appears throughout the document. So it then falls on the neighborhood to hire a lawyer to prove that an impact is significant.	The IDO tries to make decision criteria as clear as possible, while still allowing an appropriate amount of discretion for decision makers. The project consultant drafting the IDO is a land use lawyer and has confirmed that this language is standard in city-wide codes.	

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p	Gallagher, Pat	La Luz Landowners Association	11/4/16	<p>Loopholes are a common way to neutralize a regulation. The following example is from Chapter 14-16-5. The chart on page 275 will allow a deviation of 10% in building heights and 15% in setback distance. Do you know what this can do to view preservation? From the same page there are reasons to ask for a deviation. Here is one:</p> <p><i>"The applicant's site is subject to site constraints not generally shared by surrounding properties, and not created by the actions of the property owner, that would prevent the development of a permitted land use in a type of structure generally found on sites of a similar size in the surrounding area"</i></p> <p>There are view sensitive places on Coors that fit this loophole where the 10% and 15% deviation provisions would result in destroying view preservation.</p>	<p>This comment refers to the Consolidated Draft of the IDO. In the EPC draft, administrative deviations are not allowed within a VPO zone. See Section 2-7.4.D.</p>	<p>Revise Table 5-4-1 and Section 5-4.15.B.4 to be consistent with Section 2-7.4.D.</p>

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q	Forbes-Gayton, Kim		11/4/16	I am also very happy to have learned that the process toward any development will not proceed unless a developer has shown proof to the City that it has in fact met with the potentially affected neighborhood, with either the neighborhood's registered blessing, or concerns about any proposed project. I believe this policy is a win-win, as the affected neighborhood/public gets to learn, weigh in on, and vote on any potential project before the developer commits to the costs and labor toward implementation and construction. This policy could alleviate public distrust and developer angst toward development in Albuquerque.	See Lines f-m and w.	
r	Norton, Peggy	NVC	11/4/16	We look forward to hearing how well the IDO encourages transit-oriented development along Central Ave., while protecting nearby residential neighborhoods from potential negative impacts of additional density and intensity.	Noted. See standards related to Premium Transit station areas and Neighborhood Edge provisions in Section 4-8. See Lines 146-274 for comments from a project team focused on transit-oriented development on Central Ave.	

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s	Norton, Peggy	NVC	11/4/16	In pages 89 through 104 of the IDO there are at least two new permissive uses in the R-A, R-1, and R-T zones: Co-housing developments and Cottage developments. The density of each of these two permissive uses is significantly higher than the existing guidelines for development in the respective zones. In addition, the guidelines for these new permissive uses are vague and imprecise, e.g., what are the required separations between buildings?	The densities allowed in Co-housing and Cottage housing are based on the densities allowed in base zone for that property but calculated based on square footage rather than unit counts. See Use Specific Standards in Section 3-3.2D and 3-3.2E. While these housing types might result in more units than more typical single-family detached units, the benefit is a broadening of housing types available, particularly in rural areas where more people are expected to want to live over time, while still maintaining the character of the area. The limits placed on these housing types - a minimum and maximum project size and maximum unit sizes - are intended to protect the character of surrounding development.	
t	Norton, Peggy	NVC	11/4/16	During the October 13,2016 presentation by ABC-Z team members to NVC, the team was asked if the Albuquerque ordinances applied to the City Government and the answer was yes. There are sites in the North Valley where requests for zone changes to permit increased densities have been fought successfully. Adding new permissive uses (zone changes), without notifying affected residents, disenfranchises neighbors and neighborhood associations. The inserted new uses appear to be catering to members of the development community.	The IDO has been drafted and discussed with the public from February 2015 - December 2016. Direct project emails, monthly Neighborhood News articles, Facebook and Nextdoor posts, and paid and free advertising has attempted to raise awareness of the IDO throughout that time. Legal notice was given of this legislative change, and Recognized Neighborhood Associations were notified by email and mail for those without email. See Lines 87-90 and 303-307 for discussion of uses changing in the IDO.	

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u	Norton, Peggy	NVC	11/4/16	NVC members saw this preferential and biased preference for the development community at two events: the EPC hearings and a "by invitation only" workshop.	The EPC Chair has discretion to assign time limits for speakers. The Chair often allows more time to representatives of an established group, such as Neighborhood Associations and Coalitions and professional organizations. The workshops referred to in this comment were held in September 2016, the first hosted by The Urban Land Institute and UNM, and the second by the City Economic Development Department. These events were attended by City staff, members of Neighborhood Associations, planners, developers, and design professionals.	
v	Norton, Peggy	NVC	11/4/16	With respect to the IDO, the team itself acknowledged that (1) permissive uses have been expanded in various zones, including the R-1 single family zone, and (2) there is no straightforward way for residents and property owners to determine whether and how their given zoning is affected by this expansion of permissive uses, i.e., there is no indication, either by highlighting, red-lining, chart or commentary, of new material. Following the meeting, the team committed to indicating new material in some way. This should be done and the information provided directly to all homeowners throughout the City-not just neighborhood associations- well before any EPC or Council hearing on IDO.	The project team has created summaries for each adopted SDP. In February 2017, the project team hosted meetings for recognized Neighborhood Association leaders to review the proposed zones. The Zoning Conversion Map and table of SU-2 zone conversions allow interested parties to understand and compare the proposed zones. See Line a. The footnotes in the IDO indicate how existing regulations have been carried over and changed throughout the drafting process. More information is needed about what concerns the commenter has about the draft as written. The City has the authority to change zoning and dimensional standards as part of its planning and zoning powers.	

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w	Edward, John		11/29/16	The minimums by which Staff/ Administrative approval can approve a project should be as large as noted (not reduced) if not larger, especially in the Major Centers like Downtown, Uptown, Volcano Heights. They are the only trained professionals in planning and for many other people the decision is political and possibly without in depth knowledge due to limited training, time to review the material as they are not full time (i.e. EPC or City Council). Let the trained professionals of the planning department make the decisions that they are trained to make.	Noted. See Lines f-m and q.	
x	Edward, John		11/29/16	The size of the project should be based upon the scale of the impending area. For instance a 100,000 sq. ft. bldg. in downtown, uptown or Volcano Heights quite frankly is not very big and quite small. The minimum for approval for Staff should be larger as the zoning and densities and scale call for that. If you include economy of scale required for projects in zones like this 100,000 does not meet the minimums for regional or even national projects and investors who support them with capital investment. Project scales should be increased for retail, office, multi-family and industrial for the Staff/ Administrative approval. Consider that many projects don't get built due to the project being too small to be financed. If a project cannot get financing then it will never get built. Special Language is needed to get larger minimums and especially so in the Downtown, Volcano Heights or other Major Centers.	The thresholds in section 5-5.1.F.1 were established citywide for all projects at a level that seemed reasonable for administrative review by staff. See Lines f-m and n-p. Direction would be needed from decision makers to revise the thresholds, particularly in Downtown and Urban Centers.	

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y	Edward, John		11/29/16	Approvals for higher density support structures, i.e. parking garages, transit center, etc in places like Volcano Heights or Downtown get quick administrative approval as the zoning in these planned areas cannot be built or support densities without these items present.	These uses would receive administrative approval if they are less than 100,000 S.F. per Section 5-5.1.F.1.d.	
z	Horvath, Rene'		12/14/16	IDO should not be submitted – not ready, incomplete.	There is ample opportunity through the review and adoption process at EPC and City Council to make necessary revisions to the IDO. More information is needed about what specific changes need to be made to the document.	
aa	Sandoval, Christina	City Parks & Recreation Department	12/15/16	Open Space Advisory Board wants to see a prohibition from developing on 9% or greater slopes [originally in the Comp Plan about the Sandia Foothills] incorporated.	This comment refers to a Policy in the 2013 Comp Plan to acquire or regulate development on slopes over 10% in the Sanfia foothills. The project team understood that most of the areas in the foothills with slopes over 10% had been acquired as MPOS. Section 4-2.3.A.2 is intended to have the same effect, while giving latitude for regulating development on steep slopes less than 10% and extending this protection throughout the city.	
bb	Abeyta, Stephen	San Jose Neighbor-hood	1/18/17	Nothing is protecting us.	The San Jose SDP requires a landscape buffer in the is 5 ft. The IDO has a larger required buffer, which would provide greater protection for residents than what is required by the SDP. See Section 4-6.5.D.	Add a Use Specific Standard for industrial uses that require an air quality permit to either establish a distance separation between the permits or a maximum number per square area. Staff is doing analysis in order to recommend an effective approach.

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cc	Caudill, Larry		1/18/17	Notion that there is incompatibility between zoning – don't buy that. Planning department is in charge of that.	The Planning Department is in charge of ensuring rational zoning that implements the Comp Plan. The proposed changes are intended to address the problem the Planning Department has with today's system in providing an efficient, consistent enforcement of zoning that should, but often struggles to, implement the Comp Plan.	
dd	Horvath, Rene	TRNA, WSCONA	1/18/17	Densities in the IDO are not appropriate.	See Line cc. The IDO attempts to strike a balance between encouraging development in appropriate zones while protecting surrounding development with Neighborhood Edge provisions, Contextual Standards for residential zones, and Building Design standards intended to result in higher-quality buildings throughout the city. Direction would be needed from decision-makers to change proposed densities in the IDO zones.	

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ee		HNA, et al.	3/1/17	<p>In low-income communities of color along the railway, and existing within the I-25 and I-40 corridors where uses of residential housing and industrial activities are adjacent, to avoid land-use conflicts (adverse noise, air pollution) and to protect the health, safety of residents from adverse impacts to maximize the health effects of families living near and around industrial development, housing should continue to remain a low-density residential area. In low-income communities of color along the railway, and existing within the I-25 and I-40 corridors where uses of residential housing and industrial activities are adjacent. Where existing residential housing is near/adjacent to industrial uses, impacted communities shall have a Redevelopment Program that engages community members to participate in the planning of redeveloping of their community by planning land uses carefully so that land is used in a better way than before. Polluting industries should be restricted from locating in these areas saturated with other polluting industries. This will improve the quality of the environment of that area.</p>	<p>The IDO codifies the commitment to long-range planning with communities on a 5-year cycle. See Section 5-3 for a description of the Community Planning Area assessments. The Comp Plan maps single-family uses and zones as Areas of Consistency, and the IDO includes extra landscape buffering where Areas of Consistency abut Areas of Change. See Section 4-6.5. See also Neighborhood Edges in Section 4-8 for other protections for low-density residential zones next to higher-intensity zones.</p>	See Line bb.

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ff	Varoz, Camille		3/3/17	It is my testimony in writing and through Public Comments that I have had concerns with the Density Living concept. The already existing structures down 4 <sup>th</sup> Street are not complementary to our southwest architecture. The elevations are beyond 4-stories, when you take into consideration the heating and cooling units on top of the building. The setbacks are a concern.	The North 4th Sector Development Plan allows multi-story development and establishes setbacks similar to those proposed in the IDO. This Sector Development Plan was developed over several years with residents, business owners, and other stakeholders. The IDO is intended to carry over the existing zoning entitlements established in that SU-2 zoning. See the conversion table for SU-2 zones for the proposed IDO conversions. See also the Conversion Map online.	See Line 140.
gg	Varoz, Camille		3/3/17	The structure on 4 <sup>th</sup> south of Griegos is beyond 4-stories. If there are guidelines and criteria for the developers, who monitors the building plans from start-finish? The density structure on south 4th Street past Mountain Road, the elevation and setbacks are not inline with the building codes. After the fact is NOT acceptable.	The Planning Department is responsible for monitoring building plans from start to finish. Likely, the building meets the SU-2 zoning in the North 4th Corridor Sector Development Plan.	
hh	Varoz, Camille		3/3/17	4. <b>Equity:</b> the zoning changes and development has to be equitable for all neighborhoods. Public Notices have to be distributed to all neighborhoods in both English and Spanish.	The existing Zoning Code does not currently require public notification in English and Spanish. Direction would be needed from decision-makers to add that requirement in the IDO.	
ii	Horvath, Rene		3/3/17	How will those designations and R-270 be used to evaluate zoning changes? For example, much of the Coors Corridor in the Taylor Ranch area is developed, yet the designation is "area of change"? This brings about a great amount of uncertainty for property owners throughout our neighborhood. (TRNA Feb.10, 2016)	Both R-270-1980 and Areas of Change/Consistency have been incorporated into the IDO as criteria for zone changes. See Section 5-5.3.B.3. Zone change requests in Areas of Consistency must show 2 of 3 criteria that warrant the zone change. Zone change requests in Areas of Change must show 1 of 3 (same as today's Zoning Code).	

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jj	Horvath, Rene		3/3/17	a) <del>Encourage</del> <u>Provide</u> meetings between developers and residents to identify and address issues prior to official submittal of projects for approval.	See Table 5-1-1 that requires meetings between applicants and Recognized Neighborhood Associations for projects requiring DRB or EPC review.	
kk	Horvath, Rene		3/3/17	b) <del>Encourage</del> <u>Require</u> pre-application review by staff and relevant departments/ agencies to facilitate coordinated reviews and early identification and resolution of issues.	See Table 5-1-1 that requires pre-application review by staff for projects requiring DRB or EPC review.	
ll	Vencill, Elizabeth		3/6/17	Buildings look the way they look because of soil conditions (sandy) for building.	This comment was related to building heights. The IDO does not require multi-story buildings. The quality of soil conditions on each site will certainly affect the design of buildings. This concern is largely a building issue handled by International Building Codes rather than a zoning issue, in which soil conditions do not come into play.	
mm	Valles, Joe		3/7/17	At least some of the Sector Plans were specifically adopted to keep rampant apartment development at bay in order to accommodate job-creating zoning. The current market trend in ABQ is to build apartments. Many of the plans contain C-2 Zoning and if recent attempts to accommodate apartments through commercial zoning is any indication, then say goodbye to the opportunity of having offices, shopping and jobs in those sector plans.	C-2 is proposed to convert different on the East and West sides specifically to address the jobs-housing imbalance. Properties zoned C-2 west of the river convert to NR-C, a Non-Residential Commercial zone crafted intentionally to preserve land for offices, shopping, and jobs. See also Lines 5, 90, and 304.	

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nn	Donna & Mike		3/7/17	I know that you have encouraged community discussion about the Plan, and recently set aside time to meet with Raynolds Addition residents at the Hotel Blue. This is to your credit, and I am sorry I couldn't make it to that meeting. Although I don't know if I could have asked informed questions at the time. The Jesse Lopez comment made me curious about this zoning issue, so I'm asking if you could share your perspectives on how zoning variances, if any, may impact the Raynolds Addition neighborhood.	The project team is appreciative of all the public input and participation in reviewing and improving the IDO. Staff is happy to meet with Neighborhood Associations to discuss the implications of the IDO. Staff also holds office hours Monday and Friday afternoons for individuals or small groups. Contact <a href="mailto:abctoz@cabq.gov">abctoz@cabq.gov</a> to request an appointment.	
oo	Strozier, Jim		3/13/17	The purpose of this email is to express concern regarding a proposed policy in the Comprehensive Plan and regulation in the Integrated Development Ordinance regarding on-street parking and residential parking permits. The regulation/policy reads as follows:  Comprehensive Plan – the following policy should be removed:  Chapter 7 – Urban Design Policy 7.4.2.b.iii. Credit on-street parking toward parking requirements, except where residential parking permits are used.	Parking in residential areas near active commercial areas is highly contentious. The IDO credits on-street parking toward minimum parking requirements except in areas where neighborhoods have established residential parking permits. By creating residential parking permit areas, the City is acknowledging priority for residential parking, and the IDO is respecting that City acknowledgment.	

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pp	Strozier, Jim		3/13/17	<p>This proposed regulation and policy is contradictory to the Comp Plan's stated goals of encouraging higher density and intense development along transit corridors and activity centers. On-street parking should be allowed to be counted toward the off-street parking requirement when residential parking permits are in place. On-street parking spaces can only be counted toward the off-street parking requirements when the on-street spaces are adjacent to the site. Future residents of the proposed project will be able to park in these on-street spaces by applying for a parking permit through the City. If it is a non-residential project, then those adjacent spaces are appropriate for customers and should not be reserved for non-adjacent neighbors. We believe this policy could be contradictory to revitalizing urban areas of the city as called for in the Draft Comprehensive Plan.</p>	<p>See Line oo. The purpose of residential parking permits is to help ensure that parking from nearby businesses does not encroach into the neighborhood, which has been a concern from many neighborhood residents. The Comp Plan policy is intended to continue those protections when non-residential development occurs.</p>	