



**Environmental
Planning
Commission**

Agenda Number: 1
Project #: PR-2018-001843
Case #: RZ-2022-00059
Hearing Date: December 08, 2022

Staff Report

Applicant

City of Albuquerque Planning
Department

Request

Amendments to the Integrated
Development Ordinance (IDO)
Text regarding the Housing
Forward Initiative (Council
Bill No. O-22-54)

Location

Citywide

Staff Recommendation

***That PR-2018-001843/RZ-2022-00059 be continued
for one month to the January 19, 2023 regular EPC
hearing.***

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Summary of Analysis

The request is for various legislative amendments to the text of the Integrated Development Ordinance (IDO) to address the need citywide for more housing opportunities in conjunction with the 2022 IDO Annual Update. The proposed text amendments, which are part of the Mayor's Housing Forward Initiative, are contained in Council Bill No. O-22-54. The other citywide proposed text amendments constitute the IDO annual update, which is required by Subsection 14-16-6-3(D) and is the subject of another Staff report.

Council bill O-22-54 introduces regulatory revisions intended to respond to changes in the supply and demand for housing, improve access to affordable housing, and remove regulatory barriers. The intent is to facilitate provision of additional housing options in order to address homelessness, prevent displacement, and increase housing options for families at all income levels, but especially for lower-income households.

The proposed text amendments are found in Council bill O-22-54. Staff has also summarized the proposed changes in a spreadsheet for easy review, attached to this report. For each proposed change, the following information is provided: relevant page and section of the IDO, the text proposed to change, and an explanation. The bill and the spreadsheet are the main components of the request.

The request is generally consistent with applicable Comprehensive Plan goals and policies that pertain to land use and housing. The proposed changes are intended to address a community-wide housing shortage.

As of this writing, Staff has received many comments from the public. Some include suggested revisions. Staff recommends a continuance to the regular EPC hearing on January 19, 2023, but will be prepared should the EPC choose to make its recommendation at the December 8, 2022 special hearing.

Comments received before November 28th at 9AM are attached to and addressed in this Staff Report. Comments received before December 1st at 12 PM are attached, but not addressed. Clarifying materials received before December 6th at 9 AM (after publication of this report and more than 48 hours before the hearing) will be forwarded to the EPC for consideration at the hearing and are not attached to this report.

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I. INTRODUCTION

Background

In October, the Mayor launched the Housing Forward initiative, which includes multiple strategies to increase housing supply and access to existing housing. These strategies include City projects to convert hotels and motels to supportive affordable housing; funding for others to convert commercial and office buildings to housing; legislation to protect tenants, limit short-term rentals, and prohibit discrimination based on source of income (i.e. vouchers for rent); and efforts to improve enforcement of nuisance properties and expand the workforce that can construct housing. More information about the Housing Forward Initiative can be found on this City webpage: <https://www.cabq.gov/family/housing-forward-abq-1>

The Housing Forward initiative is intended to address a worsening housing shortage in Albuquerque affecting families at all income levels and an ongoing challenge of addressing homelessness for many people that impacts existing neighborhoods and businesses. Both rents and housing costs have risen dramatically in recent years, which affects everyone but disproportionately impacts lower-income families, since the supply of affordable housing is decreasing faster than incomes rise.

Albuquerque is a city of neighborhoods. Over the last decade, the growing housing shortage at all income levels, but especially affordable housing, and the increased number of people living without shelter have placed new pressure on neighborhoods. Throughout the city, rising home prices have incentivized some homeowners to sell, but fewer residents can afford to buy. Generational shifts mean more Millennials and Boomers (the largest generations) want rental units. Albuquerque's multi-family development has not kept pace with demand, so people looking for market-rate housing and people needing affordable housing are competing for too few rental units. Rising rents, living costs, and addiction and other challenges associated with poverty have put more families at risk for homelessness. Over recent years, encampments have become commonplace in public areas. The impacts to neighborhoods have included loss of safe and inviting access to parks, sidewalks, and thoroughfares, as well as degradation of the business and tourism districts.

The Housing Forward initiative has identified proposed changes to remove regulatory barriers to residential development, while increasing flexibility for incremental residential development that provides "naturally affordable" dwelling units that can also be an income source for existing residents. In combination, these strategies are designed to address the housing shortage we face now and to prepare for the growth we will continue to face in the future, if current trends continue. Given existing deficiencies, these strategies seek to increase opportunities for affordable housing development balanced with the objective of preserving the best aspects of our communities.

The proposed zoning changes to increase housing supply and housing options throughout the city were introduced by City Council as an Ordinance ([O-22-54](#)) in November 2022 and referred to the Environmental Planning Commission (EPC) to be heard in conjunction with the City's Annual Update of the Integrated Development Ordinance (IDO) at the December 8, 2022 hearing.

This bill and the other text amendments to be heard on December 8 propose to change the IDO that will be in effect as of December 25, 2022.

IDO Subsection 14-16-6-4(3) allows the City to submit an application to amend IDO text, while Subsection 14-16-6-4(3) requires the Planning Department to submit amendment for the Annual Update pursuant to Subsection 14-16-6-3(D) (Annual Updates to the IDO).

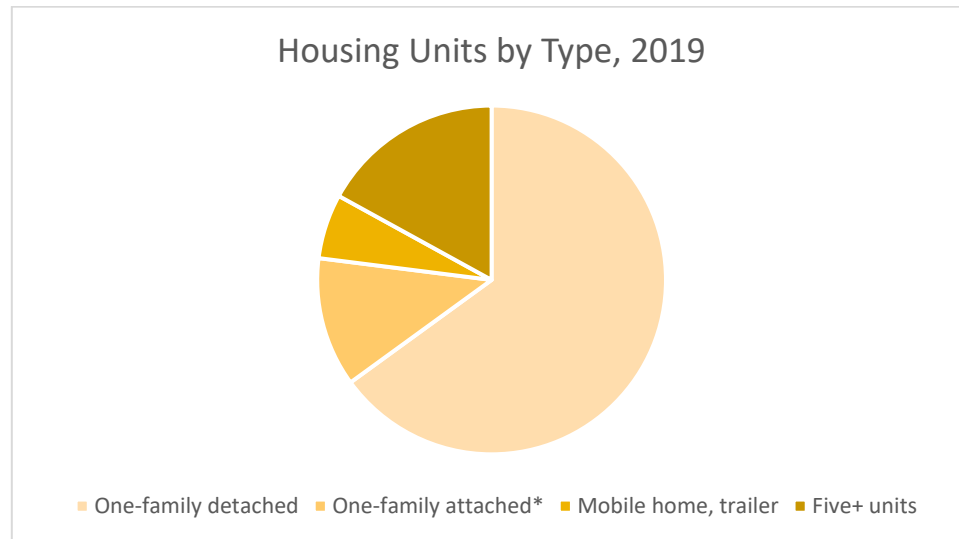
Table 6-1-1 establishes the requirements for applications that request an Amendment to IDO Text – Citywide, pursuant to specific procedures in Subsection 14-16-6-7(D). Citywide text amendments apply generally throughout the City, are legislative in nature, and are reviewed using a legislative process.

Growing Housing Shortage

A review of existing housing conditions, projected population growth, and housing development patterns from recent years makes clear that our existing pressures of housing supply and affordability are on track to grow worse.

The New Mexico Mortgage Finance Authority (MFA) noted, in its Housing Strategy released in September 2022, that Bernalillo County (including the City of Albuquerque) struggled to keep up with growth in terms of housing production: “[G]rowth in housing units barely kept up with population growth and it is unlikely that enough units were added to maintain a healthy vacancy rate.”¹

The Housing Strategy reported that housing options in Bernalillo County are heavily weighted toward single-family detached units as of 2019, while only 17 percent of the housing stock is multi-family with 5 or more units.²



¹ New Mexico Mortgage Finance Authority, “Housing New Mexico: A Call to Action,” September 2022, page 1. Available here: https://housingnm.org/uploads/documents/New_Mexico_Housing_Strategy_Complete_Report_Sept_2022.pdf

² Ibid, figure I-8, page 13.

Homeownership is much more prevalent for white families, so Black, Indigenous, and People of Color (BIPOC) families face more housing challenges, given the city's imbalanced housing stock. A housing needs assessment contracted by the City's Office of Equity and Inclusion reported that homeownership for white families is 68 percent, while Black homeownership is 42 percent and Native homeownership is 40 percent.³

Meanwhile, the MFA housing strategy projected that Bernalillo County would absorb 42 percent of the state's growth expected by 2035.⁴ Bernalillo County is projected to add around 27,400 new households by 2035, or a 10 percent increase.⁵

For these new households, the MFA strategy projects the number of housing units in Bernalillo County that need to be added at the different income levels for these households by 2025 and 2035.⁶ As of 2019, the U.S. Census estimated the area median income (AMI) for Bernalillo County to be \$53,329.

Total units needed by 2025		Percent of Area Median Income (AMI)					
		0-30%	30-50%	50-80%	80-100%	100-120%	120%+
Total	10,154	1,812	1,428	1,728	937	851	3,396
<i>Rental</i>	<i>4,333</i>	<i>1,130</i>	<i>951</i>	<i>768</i>	<i>615</i>	<i>569</i>	<i>299</i>
<i>Ownership</i>	<i>5,821</i>	<i>682</i>	<i>477</i>	<i>960</i>	<i>322</i>	<i>282</i>	<i>3,097</i>

Total needed by 2035		Percent of Area Median Income (AMI)					
		0-30%	30-50%	50-80%	80-100%	100-120%	120%+
Total	19,382	3,459	2,727	3,299	1,789	1,625	6,483
<i>Rental</i>	<i>8,271</i>	<i>2,156</i>	<i>1,815</i>	<i>1,466</i>	<i>1,174</i>	<i>1,087</i>	<i>571</i>
<i>Ownership</i>	<i>11,111</i>	<i>1,303</i>	<i>911</i>	<i>1,832</i>	<i>615</i>	<i>538</i>	<i>5,912</i>

The Planning Department does not capture data about affordability or tenure for building permits issued, but generally, building permits for multi-family would contribute to rental housing units, while single-family would contribute to homeownership opportunities.

³ City Office of Equity & Inclusion, "City of Albuquerque Housing and Entrepreneurship, Part I: Needs Assessment Report," October 11, 2022, page 47. Available here: https://www.cabq.gov/office-of-equity-inclusion/documents/221011_abq-housing_site-planning-analysis-report-d3.pdf

⁴ New Mexico Mortgage Finance Authority, "Housing New Mexico: A Call to Action," September 2022, page 3. Available here: https://housingnm.org/uploads/documents/New_Mexico_Housing_Strategy_Complete_Report_Sept_2022.pdf

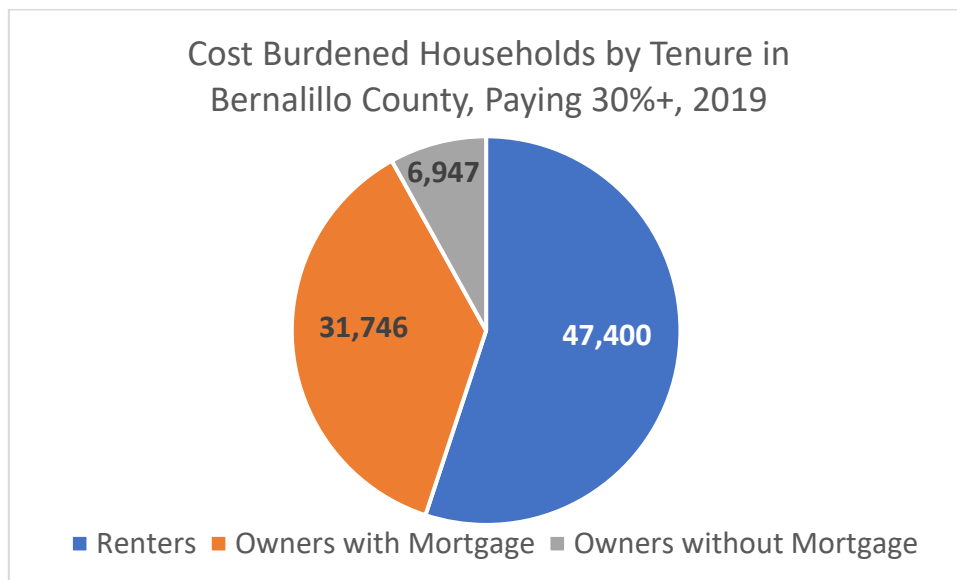
⁵ Ibid, page 28.

⁶ Ibid, page 31 and page 32.

Year	SF permits	MF permits	Total
2016	915	567	1,482
2017	971	984	1,955
2018	1,331	148	1,479
2019	827	839	1,666
2020	935	126	1,061
2021	800	791	1,591

During the years 2016 through 2021, an average of 963 single-family and 575 multi-family developments received permits. If this pattern continues, the City would approve 3,853 single-family units and 2,303 multi-family units by the end of 2025. Even acknowledging that housing development in unincorporated Bernalillo County will contribute to these numbers, it is unlikely that the County would approve more than the City, so housing supply would still be short of the projected need.

This housing shortage would disproportionately affect low-income households. The MFA housing strategy reported that as of 2019, almost 1 of every 3 households in Bernalillo County pays 30 percent or more of their income on housing, which is commonly defined as “cost burdened households.”⁷ Of those households, renters are an overwhelming majority.



Taken together, these statistics indicate that the housing shortage in Albuquerque, which disproportionately impacts low-income and BIPOC families, is likely to continue without a significant change to the status quo.

⁷ New Mexico Mortgage Finance Authority, “Housing New Mexico: A Call to Action,” September 2022, combination of Figure I-12 on page 20 and Figure I-13 on page 21, calculated with household total of 285,185 for Bernalillo County in the U.S. Census ACS estimates for 2019. MFA report available here: https://housingnm.org/uploads/documents/New_Mexico_Housing_Strategy_Complete_Report_Sept_2022.pdf

Zoning to Increase Housing Supply

Generally, the most effective strategy to ensure an adequate supply of housing that local families can afford is to make sure that housing production keeps pace with housing demand. Affordable housing, particularly affordable to households with incomes at the lowest percentage of AMI, requires additional subsidy, as the rents charged cannot cover the cost of construction or maintenance.

Albuquerque only has large tracts of developable land in Mesa del Sol, which is zoned PC and bordered by the Isleta Pueblo on the south; in North Albuquerque, which is bordered by Sandia Pueblo on the north; and on the West Side. Additional housing development on the West Side, which already suffers from an imbalance of jobs-housing, would exacerbate traffic congestion on the few, already-crowded river crossings.

Given the land-locked nature of ABQ, increasing housing supply to keep rents and housing prices down will require increasing density in existing areas to keep up with growth. Without intervention, families will begin to move to surrounding jurisdictions with less-costly housing. People will either have to commute to Albuquerque for work, adding to traffic congestion, or change jobs, worsening the city's economy. This downward cycle for Albuquerque would incentivize job creation elsewhere if too much of the workforce moves away from ABQ.

In terms of zone districts that allow different types of housing, different zone districts allow a different mix of housing types in order to provide predictability for property owners and neighbors, as well as minimize potential conflicts among uses with different impacts on surrounding properties. (See Table below.)

Category	Zone Districts	Total Zoned Acreage	% of Total Zoned Acreage	% of Developable, Straight-zoned Acreage	Total SF Acreage	Total Duplex Acreage	Total MF Acreage
		160,151	100%				
Unclassified		1,945	1%				
NR-PO*		20,579	13%				
Developable, straight-zoned land**		56,753	35%	100%	36,578	10,383	12,730
	R-A	2,559	2%	5%	2,559		
	R-1***	27,564	17%	49%	27,564	4,587	
	R-MC	659	0%	1%	659		
	R-T	2,373	1%	4%	2,373	2,373	
	R-ML	2,243	1%	4%	2,243	2,243	2,243
	R-MH	1,734	1%	3%			1,734
	MX-T	1,180	1%	2%	1,180	1,180	1,180
	Other MX zones	7,573	5%	13%			7,573
	Other NR zones****	10,869	7%	19%			
Other zones*****		24,120	15%				

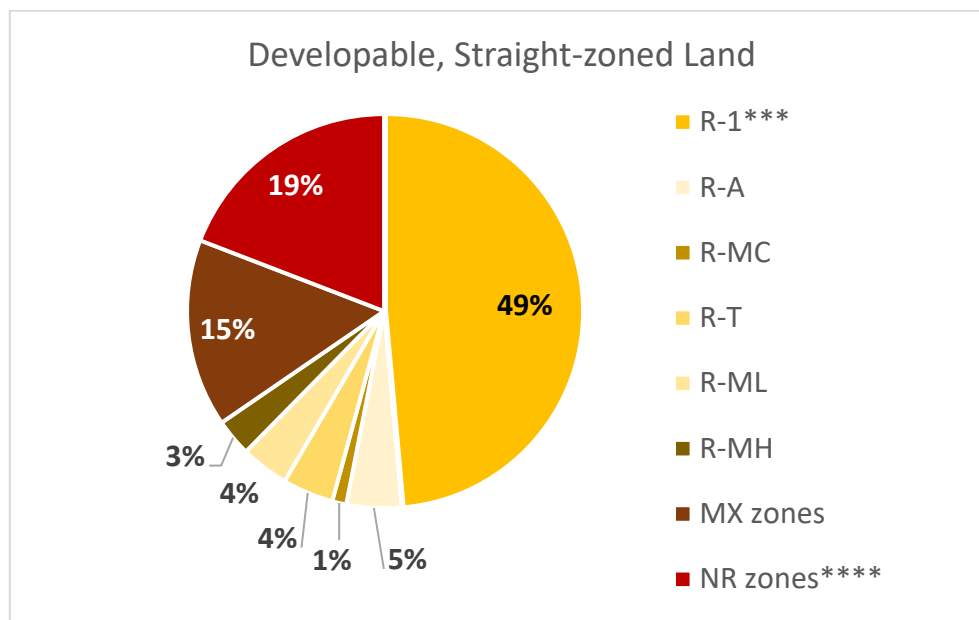
* Includes NR-PO-A, NR-PO-B, NR-PO-C sub-zones

** Includes R-1, R-MC, R-T, R-ML, MX-T, MX-L, MX-M, MX-H, NR-C, NR-BP, NR-LM, NR-GM

*** Includes R-1A, R-1B, R-1C, R-1D sub-zones (note that the Duplex Acreage only includes R-1A)

**** Includes NR-C, NR-BP, NR-LM, NR-GM

***** Includes NR-SU, PC, PD



Approximately 64 percent of the land that is developable and zoned with a “straight” zone that includes a range of allowable uses by right in Table 4-2-1 is zoned to allow single-family (SF) development (i.e. zoned R-A, R-1, R-MC, R-T, R-ML, or MX-T).

The R-1 zone district makes up 49 percent of this land, with 27,564 acres, and 68 percent of parcels in the city, with 135,894 parcels of the 199,031 parcels in the city. The R-1 zone district primarily allows single-family, detached dwellings, whether on their own parcels or part of a cluster or cottage development. R-1 does not allow townhouses or multi-family development.

Currently, only the R-1A sub-zone allows two-family detached dwellings (i.e. duplexes) and only if the duplex is on 2 parcels, with each unit on its own parcel, and the shared wall on the shared property line. R-1A makes up only 8 percent of developable, straight-zoned land in the city. R-T, R-ML, and MX-T are the only other zones that allow duplexes, since R-MH and the other Mixed-use zone districts are intended to allow higher-density development. This totals to 10,383 acres where duplexes are allowed in the city, or 18 percent of developable, straight-zoned land.

Approximately 22 percent of developable, straight-zoned land, or 12,730 acres, is zoned to allow multi-family (MF) development (i.e. zoned R-ML, R-MH, MX-T, MX-L, MX-M, or MX-H). While single-family development is allowed in R-ML and MX-T, it is not allowed in the other zone districts that allow multi-family in order to reserve adequate land for multi-family development.

The proposed amendment is intended to increase housing supply by allowing more housing options in the R-1 zone district, which currently accounts for half the developable land with straight zoning, and providing incentives for additional multi-family development primarily in the Mixed-use zones, provided as both affordable housing and market-rate housing.

The housing crisis is a national issue; Albuquerque would not be the first to adopt measures such as those proposed.

In 2019, the City of Minneapolis adopted a long-range housing plan that ended the SF exclusive zoning that existed in approximately 70 percent of the city's land. Under the revisions, homeowners in previous R-1 zones were able to add one or two dwelling units, effective January 2020. In the 30 months from January 2020 through June 2022, fewer than 50 permits have been issued, representing approximately 100 new residential units.

The state of Oregon, also in 2019, passed HB 2001 which used various means to remove R1 restrictions, effectively prohibiting exclusive single-family zoning throughout the state. While the precise measures differ based on the size of the city, the policy effectively allows duplexes in areas where only single-family housing had been allowed previously.

Request

This request is for various citywide amendments to the text of the Integrated Development Ordinance (IDO) in conjunction with the Annual Update required by IDO Subsection 14-16-6-3(D).

Council bill O-22-54 proposes six (6) changes. For easy review, a spreadsheet (see attachment) of these changes has been prepared that provides the following information: item number for tracking purposes, the page and section of the IDO that would be modified, the text proposed to change, an explanation of the purpose and/or intent of the change, and a cross reference to the relevant section of the bill.

Applicability

The proposed IDO text amendments apply citywide to land within the City of Albuquerque municipal boundaries. Where citywide regulations conflict with special regulations that apply in a small area, small area regulations prevail; therefore, proposed citywide amendments would not apply in a small area with special regulations that conflict with proposed citywide amendments. The IDO does not apply to lands controlled by another jurisdiction, such as the State of New Mexico, or to Federal lands. Properties in unincorporated Bernalillo County or other municipalities, such as the Village of Los Ranchos and City of Rio Rancho, are also not subject to the IDO.

Environmental Planning Commission (EPC) Role

The EPC is hearing this case pursuant to IDO Subsection 14-16-6-7(D), Amendment to IDO Text – Citywide. The EPC's task is to review the proposed changes and make a recommendation to the City Council regarding the proposed IDO text amendments in O-22-54 as a whole. The EPC is a recommending body with review authority and can submit Conditions for Recommendation of Approval as it deems necessary. As the City's Planning and Zoning Authority, the City Council will make the final decision. This is a legislative matter.

II. ANALYSIS OF ORDINANCES, PLANS, AND POLICIES

Integrated Development Ordinance (IDO)

The request for an Amendment to IDO Text – Citywide was submitted in November 2022, so this application is subject to the applicable standards and processes of the IDO effective as of July 28, 2022. Specifically, the specific procedure in Subsection 14-16-6-7(D) applies. Planning Department staff submitted the changes proposed by Council bill no. O-22-54 to the EPC for review and recommendation, as required.

The request is required to meet the review and decision criteria for Amendment to IDO Text – Citywide in Subsection 14-16-6-7(D)(3)(a-c). The “Whereas” clauses in O-22-54 constitute the applicant’s justification letter (see attachment). Staff analysis below demonstrates that the request adequately meets the criteria. The requirement is in plain text; Staff analysis follows in ***bold italic*** text.

Criterion 14-16-6-7(D)(3)(a)

The proposed amendment is consistent with the spirit and intent of the ABC Comp Plan, as amended (including the distinction between Areas of Consistency and Areas of Change), and with other policies and plans adopted by the City Council.

The proposed citywide text amendments are generally consistent with the spirit and intent of the Comprehensive Plan, and other policies and plans adopted by the City Council, because they would generally help guide growth and development and identify and address significant issues in a holistic way (Comprehensive Plan, p. 1-5). The proposed changes are consistent with Comprehensive Plan Goals and policies that direct the City to adopt and maintain an effective regulatory system for land use and zoning. Though analysis reveals a few instances of conflict, overall the request meets Criterion 14-16-6-7(D)(3)(a). See Section III of this report for Staff’s policy analysis.

Criterion 14-16-6-7(D)(3)(b)

The proposed amendment does not apply to only one lot or development project.

The proposed citywide text amendments would apply throughout the City and not to only one lot or development project. The changes would apply across particular zone districts or for all approvals of a certain type; therefore, the proposed citywide amendments are legislative in nature. Proposed changes to specific zones (ex. Mixed-use zone districts) would apply equally in all areas with the same designation and are not directed toward any specific lot or project, and use-specific changes would apply equally to all applications for that land use; therefore, the request meets Criterion 14-16-6-7(D)(3)(b).

Criterion 14-16-6-7(D)(3)(c)

The proposed amendment promotes public health, safety, and welfare.

The request generally promotes the public health, safety, and welfare of the City because overall the proposed text amendments further a preponderance of applicable Goals and policies in the Comprehensive Plan. (See Section III for Staff’s in-depth policy analysis.) The proposed amendments are intended to address a crisis in housing supply community-wide with proposed changes that would promote housing citywide; therefore, the request meets Criterion 14-16-6-7(D)(3)(c).

Charter of the City of Albuquerque

The Citizens of Albuquerque adopted the City Charter in 1971. Applicable articles include:

Article I, Incorporation and Powers

The municipal corporation now existing and known as the City of Albuquerque shall remain and continue to be a body corporate and may exercise all legislative powers and perform all functions not expressly denied by general law or charter. Unless otherwise provided in this Charter, the power of the city to legislate is permissive and not mandatory. If the city does not legislate, it may nevertheless act in the manner provided by law. The purpose of this Charter is to provide for maximum local self-government. A liberal construction shall be given to the powers granted by this Charter.

Amending the IDO via text amendments is consistent with the purpose of the City Charter to provide for maximum local self-government. The revised regulatory language in the IDO would generally help implement the Comprehensive Plan.

Article IX, Environmental Protection

The Council (City Commission) in the interest of the public in general shall protect and preserve environmental features such as water, air and other natural endowments, ensure the proper use and development of land, and promote and maintain an aesthetic and humane urban environment. To affect these ends the Council shall take whatever action is necessary and shall enact ordinances and shall establish appropriate Commissions, Boards or Committees with jurisdiction, authority and Staff sufficient to effectively administer city policy in this area.

The proposed citywide text amendments would help ensure that land is developed and used properly and that an aesthetic and humane urban environment is maintained. The IDO is the implementation instrument for the City's Comprehensive Plan, which protects and promotes health, safety, and welfare in the interest of the public.

Article XVII, Planning

Section 1. The Council is the city's ultimate planning and zoning authority, including the adoption and interpretation of the Comprehensive Plan and the Capital Improvement Plan. The Council is also the city's ultimate authority with respect to interpretation of adopted plans, ordinances, and individual cases.

Amending the IDO is an instance of the Council exercising its role as the City's ultimate planning and zoning authority. The IDO will help implement the Comprehensive Plan and ensure that development in the City is consistent with the intent of any other plans and ordinances that the Council adopts.

Section 2. The Mayor or his designee shall formulate and submit to the Council the Capital Improvement Plans and shall oversee the implementation, enforcement, and administration of land use plans.

Amending the IDO through the annual update process will help the Administration to implement the Comprehensive Plan vision for future growth and development, and will help with the enforcement and administration of land use plans.

Albuquerque / Bernalillo County Comprehensive Plan (Rank 1)

The Comprehensive Plan and the IDO were developed together and are mutually supportive. The overarching purpose of the IDO (see Subsection 14-16-1-3) is to implement the Comprehensive Plan and protect the health, safety, and general welfare of the public.

The request for an Amendment to IDO Text – Citywide is generally consistent with a preponderance of applicable Comprehensive Plan Goals and policies, though some conflicts emerge and are explained below in the Staff analysis in Section III.

Chapter 5: Land Use

Goal 5.3 - Efficient Development Patterns: Promote development patterns that maximize the utility of existing infrastructure and public facilities and the efficient use of land to support the public good.

Policy 5.3.1 - Infill Development: Support additional growth in areas with existing infrastructure and public facilities.

The proposed text amendments would generally help promote development patterns that maximize the utility of existing infrastructure and public facilities. For example, allowing two-family dwellings (duplexes) and accessory dwelling units in the R-1 zone district would promote gentle infill development, which by definition uses existing infrastructure and public facilities. The request is generally consistent with Goal 5.3- Efficient Development Patterns and Policy 5.3.1- Infill Development.

Policy 5.3.7 – Locally Unwanted Land Uses: Ensure that land uses that are objectionable to immediate neighbors but may be useful to society are located carefully and equitably to ensure that social assets are distributed evenly and social responsibilities are borne fairly across the Albuquerque area.

The proposed amendments are consistent with this policy because they would allow additional housing in existing areas throughout the city so that all neighborhoods can help address the housing shortage by allowing more dwelling units in R-1 and allowing higher densities in R-MH and Mixed-use zone districts. Multi-family development (commonly referred to as apartments) is often unwanted by immediate neighbors, even though it provides necessary rental housing for families that cannot afford to own a home, cannot access capital, or choose a different housing style. Proposed amendments would provide additional housing and rental options in R-1 areas, which may reduce the need for multi-family development in desirable neighborhoods.

Policy 5.7.2 - Regulatory Alignment: Update regulatory frameworks to support desired growth, high quality development, economic development, housing, a variety of transportation modes, and quality of life priorities.

The proposed amendments help to implement goals and policies in the Comprehensive Plan, thereby updating the regulatory framework to support desired growth, housing, and quality of life. Where proposed text amendments do not further Comprehensive Plan goals and policies, conditions for recommendation of approval can be applied. The request is generally consistent with Goal 5.7- Implementation Processes and Policy 5.7.2- Regulatory Alignment.

Policy 5.7.5 - Public Engagement: Provide regular opportunities for residents and stakeholders to better understand and engage in the planning and development process.

The purpose of the Annual Update process for the IDO is to provide a regular opportunity for residents and stakeholders to better understand and engage in the planning and development process. The proposed amendments pertaining to housing have been submitted as a separate bill but referred to EPC to be heard at the same hearing to allow those participating in the Annual Update to also weigh in about the proposed housing changes. The request is generally consistent with Policy 5.7.5-Public Engagement.

Chapter 7: Urban Design

Goal 7.4 - Context-Sensitive Parking: Design parking facilities to match the development context and complement the surrounding built environment.

Policy 7.4.1 Parking Strategies: Provide parking options, optimize parking efficiencies, and plan for parking as essential infrastructure.

Policy 7.4.2 - Parking Requirements: Establish off-street parking requirements based on development context.

The proposed text amendments include changes to reduce parking requirements for multi-family development in Mixed-use zone districts, which would generally match the applicable development context and complement the surrounding built environment. The proposed text amendments also include changes to eliminate parking requirements for affordable housing provided as multi-family development in any zone district that allows multi-family development, regardless of development context. While parking could still be provided with an affordable housing project, the City would not be able to require it even if transit was not available nearby or other parking opportunities were not available nearby, thereby limiting the ability for the City to plan for parking as essential infrastructure through off-street parking requirements in the zoning code. The request is partially consistent with, and partially conflicts with, Goal 7.4 - Context-Sensitive Parking, Policy 7.4.1 Parking Strategies, and Policy 7.4.2 - Parking Requirements. See Section III for Staff's recommended Conditions of Approval that would help to eliminate conflicts and further the Comprehensive Plan goals and policies.

Chapter 8: Economic Development

Policy 8.1.2 - Resilient Economy: Encourage economic development efforts that improve quality of life for new and existing residents and foster a robust, resilient, and diverse economy.

The proposed text amendments would generally encourage economic development because they would result in increased housing construction. The request is generally consistent with Policy 8.1.2- Resilient Economy.

Chapter 9: Housing

Goal 9.1 Supply: Ensure a sufficient supply and range of high-quality housing types that meet current and future needs at a variety of price levels to ensure more balanced housing options.

Policy 9.1.1 Housing Options: Support the development, improvement, and conservation of housing for a variety of income levels and types of residents and households.

Policy 9.1.2 Affordability: Provide for mixed-income neighborhoods by encouraging high-quality, affordable and mixed income housing options throughout the area.

Goal 9.3 Density: Support increased housing density in appropriate places with adequate services and amenities.

Goal 9.4- Homelessness: Make homelessness rare, short-term, and non-recurring.

Goal 9.6 Development Process: Promote cost-effective housing redevelopment and construction that meets community needs.

Policy 9.6.1 Development Cost: Reduce development costs and balance short-term benefits of delivering less costly housing with long-term benefits of preserving investment in homes and protecting quality of life.

The proposed text amendments would promote additional housing at all income levels and housing options for a wide range of residents and households. In particular, allowing two-family dwellings (duplexes) and accessory dwelling units where only single-family dwellings are allowed currently would expand both housing options and availability in areas with existing services and amenities. The proposed expansion of the existing kitchen exemption for conversions of non-residential development to affordable housing to all conversions would allow a new housing option for households at all income levels. Because conversions do not require new construction, the housing created is expected to be “naturally affordable,” since rents do not have to cover the high cost of construction. Where these conversions are done specifically to provide affordable housing, especially when paired with supportive services, this proposed change would help to make homelessness rare, short-term, and non-recurring. The request is generally consistent with Goal 9.1 Supply, Policy 9.1.1 Housing Options, Policy 9.1.2 Affordability, Goal 9.3 Density, Goal 9.4- Homelessness, and Policy 9.6.1 Development Cost.

III. KEY ISSUES & DISCUSSION

The proposed citywide text amendments pertaining to housing are presented and explained in the spreadsheet “IDO Housing Amendments – EPC Review.” (See attachment.) This section focuses on key substantive changes and offers further discussion.

These changes are grouped by category and referred to by page number to track with the IDO effective as of December 25, 2022, since that document will become effective as the City’s review and

decision process for the proposed amendments is underway. The December IDO document is available here: <https://tinyurl.com/CABQ-IDO-12-2022>. An explanation of the proposed amendment is provided in plain text, followed by Staff analysis of policies for each proposed change in *italic text*.

Section 1: Allowing Two-Family Dwellings (Duplexes) in the R-1 Zone District

The proposed amendment would allow two-family detached dwellings (duplexes) in the R-1 zone district. IDO Section 14-16-7-1 defines this use on page 558 as follows:

Dwelling, Two-family Detached (Duplex)

A residential building containing 2 dwelling units, each of which is designed for or occupied by 1 family only, with kitchens for each. Each unit in a two-family dwelling is completely separated from the other by an unpierced wall dividing the 2 units side-to-side or back-to-front or by an unpierced ceiling and floor extending from exterior wall to exterior wall (over-under), except for a stairwell exterior to 1 of the dwelling units.

The IDO currently allows second kitchens in single-family and two-family detached dwellings permissively in R-1. (See Table 4-2-1 in the Accessory Uses category on page 149.) These can be added to create an additional independent living space within the main dwelling, often for a family member. From a land-use perspective, there is no way to distinguish a second kitchen in a dwelling from an attached accessory dwelling unit. The difference between an attached accessory dwelling unit and a duplex is that the additional unit would not be required to be accessible from the primary dwelling. In combination with the proposed change to the definition and use-specific standard for ADUs described in Section 2 below, this proposed amendment helps clarify the difference between attached and detached ADUs, second kitchens in a dwelling, and a duplex.

While this additional allowance may garner objections from some members of the public who generally do not support rentals in the R-1 zone district, the land use impacts between an accessory dwelling unit, a second kitchen, and a duplex are indistinguishable. Zoning generally does not regulate use based on whether a unit is rented or owned, or whether a dwelling unit is for a family member or an unrelated person, beyond the limits established by the definition of family in IDO Section 14-16-7-1 on page 560.

Family- Any of the following individuals or groups:

1. An individual.
2. Two (2) or more persons related by blood, marriage, legal guardianship, or adoption, plus household staff.
3. Any group of not more than 5 unrelated persons living together in a dwelling that do not meet the definition of group home. See also Group Home.
4. Any group of 5 persons or more that has a right to live together pursuant to the federal Fair Housing Act Amendments of 1988 (or as amended), as interpreted by the courts.

Beyond this limit, the Housing Code regulates occupancy to prohibit overcrowding in a dwelling.

Given the existing housing shortage, the limited land currently zoned for this use, and the disproportionate gap in homeownership for Black and Native residents, allowing duplexes in the R-1

zone could increase housing supply by allowing conversions of existing single-family houses into two-family houses. These conversions are often cited as an anti-displacement strategy, as a family can live in one unit and rent the other to help cover the mortgage or living expenses.

Where duplexes are constructed, the shared roof and wall would reduce the cost of construction per dwelling unit. The resulting dwelling units can be “naturally affordable,” since rents do not have to be as high to cover construction costs.

Duplexes are a low-density residential use, and the land use impacts would be similar to single-family dwellings. The off-street parking requirement is 1 space per dwelling unit up to 2 bedrooms or 2 spaces for dwelling units with 3+ bedrooms. Objections from commenters cite the policy about Areas of Consistency as inappropriate for significant growth; yet, from a land use perspective, duplexes constitute development or redevelopment that is consistent with the established character of low-density residential neighborhoods. This debate warrants significant consideration by the EPC.

Adding residential units helps support nearby businesses and services, and because duplexes are similar in scale and character to single-family, they are often referred to as a “gentle infill” option. Adding duplexes to existing residential neighborhoods can expand housing options for families at multiple income levels and life stages.

Policy Analysis: This amendment is consistent with the following Comprehensive Plan goals and policies in Community Identity, Land Use, and Housing.

Policy 4.1.1 Distinct Communities: Encourage quality development that is consistent with the distinct character of communities.

Policy 4.1.2 Identity and Design: Protect the identity and cohesiveness of neighborhoods by ensuring the appropriate scale and location of development, mix of uses, and character of building design.

Because of the modest scale, two-family detached dwellings (duplexes) provide an incremental increase in the supply of housing that is consistent with the community character of existing residential neighborhoods.

The policy debate is whether “character” is really about a single use – single-family homes – as opposed to the scale and design of a detached house. Both single-family and two-family dwellings are detached houses with the same character of building design. Note that Policy 4.1.2 calls for a mix of uses in neighborhoods.

From a land use perspective, neighborhoods with a mix of housing options are more resilient, vibrant, family-friendly, and supportive of the larger community than neighborhoods with exclusively single-family houses, which work best for one type of family and that do not work as well for multi-generational families, extended families, and people at different life stages (e.g. families with college age students, single parents, or single people). Adding duplexes as an allowable use in R-1 will help make existing residential neighborhoods more family-friendly for these other types of families.

Policy 4.1.4 Neighborhoods: Enhance, protect, and preserve neighborhoods and traditional communities as key to our long-term health and vitality.

The existing shortage of housing is a threat to the special places in the built environment and the safety and preservation of neighborhoods. The issues and challenges of addressing homelessness put other community characteristics at risk. The overriding objective of the Housing Forward initiative is to address this housing shortage with every strategy possible.

While adding duplexes are not directly intended to house people experiencing homelessness, adding housing supply at all income levels is expected to loosen housing pressure, allowing families to afford more housing. This proposed amendment, in combination with others proposed for the IDO and in separate Ordinances (e.g. short-term rental ordinance and public projects for the Gateway Center and hotel conversions) is intended to make fewer families at risk for homelessness and to make more options for those experiencing homelessness to transition to housing with supportive services that can address root causes, including poverty and mental health challenges.

Policy 5.1.1.g Desired Growth: Encourage residential infill in neighborhoods adjacent to Centers and Corridors to support transit ridership.

Policy 5.2.1 – Land Uses: Create healthy, sustainable, and distinct communities with a mix of uses that are conveniently accessible from surrounding neighborhoods.

5.2.1.d: Encourage development that broadens housing options to meet a range of incomes and lifestyles.

Policy 5.3.7 - Locally Unwanted Land Uses: Ensure that land uses that are objectionable to immediate neighbors but may be useful to society are located carefully and equitably to ensure that social assets are distributed evenly and social responsibilities are borne fairly across the Albuquerque area.

5.3.7.a: Minimize the impacts of locally unwanted land uses on surrounding areas through policies, regulations, and enforcement.

Goal 5.7 – Implementation Processes: Employ procedures and processes to effectively and equitably implement the Comp Plan.

Policy 5.7.2 – Regulatory Alignment: Update regulatory frameworks to support desired growth, high quality development, economic development, housing, a variety of transportation modes, and quality of life priorities.

The proposed amendment is consistent with these goals and policies because duplexes typically are provided as a rental product, so allowing duplexes in R-1 will add a housing option for families that is not currently available in these locations. Multi-family dwellings (i.e. apartments) are more common as the rental product available to families. Even though multi-family dwellings are not allowed in R-1, multi-family dwellings bordering single-family neighborhoods are often

objectionable to residents. Rental housing options are needed by many families, so they are social assets. Allowing duplexes in R-1 ensures that rental options are located equitably and distributed evenly across Albuquerque, since so much of Albuquerque is zoned R-1.

The existing regulations about setbacks and off-street parking ensure that duplexes will fit in appropriately to neighborhoods and minimize off-site impacts. Making duplexes permissive, as opposed to conditional, ensures that this necessary housing option is available where setbacks and parking standards can be met.

Goal 9.1 – Supply: Ensure a sufficient supply and range of high-quality housing types that meet current and future needs at a variety of price levels to ensure more balanced housing options.

Policy 9.1.1 – Housing Options: Support the development, improvement, and conservation of housing for a variety of income levels and types of residents and households.

9.1.1.a: Increase the supply of housing that is affordable for all income levels.

9.1.1.c: Assure the availability of a wide distribution of quality housing for all persons regardless of race, color, religion, sex, national origin, ancestry, age, or disabled status.

9.1.1.e: Provide for the development of quality housing for elderly residents.

9.1.1.f: Encourage community compounds to support multi-generational housing where such traditional development patterns exist.

9.1.1.g: Ameliorate the problems of homelessness, overcrowding, and displacement of low-income residents.

9.1.1.h: Maintain an affordable housing supply in neighborhoods, in addition to creating market-rate housing, as part of revitalization efforts.

9.1.1.j: Work on conservation, improvement, and expansion of the housing available to low- and moderate-income families until all housing in the area meets City Housing Code standards.

Policy 9.1.2 Affordability: Provide for mixed-income neighborhoods by encouraging high-quality, affordable and mixed income housing options throughout the area.

9.1.2.b: Encourage a diversity of housing types, such as live/work spaces, stacked flats, townhouses, urban apartments, lofts, accessory dwelling units, and condominiums.

9.1.2.c: Encourage housing types that maintain the scale of existing single-family neighborhoods while expanding housing options.

Policy 9.6.1- Development Cost: Reduce development costs and balance short-term benefits of delivering less costly housing with long-term benefits of preserving investment in homes and protecting quality of life.

The proposed amendment is consistent with these policies by broadening housing options in R-1 for families with a variety of income levels and generally allowing additional housing supply on 49 percent of the developable land with straight zoning in the city as part of the strategy to keep rents and housing costs more affordable.

Due to the shared wall and roof, the construction cost for new duplexes is expected to be lower per dwelling unit than a single-family home. Duplexes that are converted from an existing single-family house are expected to result in rents that can be “naturally affordable” due to the savings in construction costs.

Where large families are currently living in one dwelling unit, adding a second dwelling unit would help ameliorate overcrowding. Where a family lives in one unit and rents the other unit, the rent can help to cover mortgage and living expenses, which is an anti-poverty and anti-displacement strategy for low-income residents. Additional rental income can also help cover the cost of maintenance and improvements to existing houses.

As noted above, duplexes also provide flexibility to accommodate multi-generational families, seniors, and people with disabilities who want to live independently without having to maintain an entire single-family house.

Staff recommends that the proposed amendment be edited to keep the illustration, since it would still apply, given the use-specific standard 14-16-4-3(B)(5)(a) that allows duplex units to span a property line (i.e. have a zero lot line for an interior side setback).

Policy 9.2.1 Compatibility: Encourage housing development that enhances neighborhood character, maintains compatibility with surrounding land uses, and responds to its development context – i.e. urban, suburban, or rural – with appropriate densities, site design, and relationship to the street.

Goal 9.3 Density: Support increased housing density in appropriate places with adequate services and amenities.

Policy 9.3.1 Centers and Corridors: Encourage higher density, multi-unit housing and mixed-use development in Downtown, Urban, Activity, and Village Centers, and along Premium and Major Transit Corridors to capture growth, relieve development pressure at the edge of the urban footprint, and maintain low densities in rural areas.

Policy 9.3.2 Other Areas: Increase housing density and housing options in other areas by locating near appropriate uses and services and maintaining the scale of surrounding development.

The proposed amendment supports these policies because it is intended to increase density in existing neighborhoods that already have services, amenities, and infrastructure. While additional people can place extra burden on these existing areas, all areas require maintenance and investment over time. When public funds are inevitably needed for repairs, the cost per person will be lower. Serving existing development is by far more efficient than expanding services, infrastructure, and amenities to new areas.

As noted above, the policy debate will be about whether duplexes are the same scale of development as single-family homes. From a land use perspective, both are detached houses and low-density residential uses with the same relationship to the street.

The proposed amendment does not call for high-density housing options in low-density residential neighborhoods, so the amendment is not in conflict with Policy 9.3.1.

The proposed amendment conflicts with the following Comprehensive Plan policy:

Policy 5.6.3 Areas of Consistency: Protect and enhance the character of existing single-family neighborhoods, areas outside of Centers and Corridors, parks, and Major Public Open Space.

As noted above, if “character” is taken to mean “use,” then the proposed amendment would conflict with this policy that specifically names single-family neighborhoods, since the amendment would allow two-family dwellings where only single-family dwellings are allowed currently. The preponderance of other goals and policies that the proposed amendment is consistent with outweighs this conflict.

It is important to note that single-family neighborhoods are currently under threat from the pressures and challenges related to the severe housing shortage and issues related to homelessness. Helping to provide more housing is a strategy that can help to protect single-family neighborhoods. As commenters have noted, that additional housing could be allowed exclusively outside of R-1, but that approach would conflict with Policy 5.3.7 - Locally Unwanted Land Uses, which advocates for socially beneficial uses to be distributed throughout Albuquerque. Because R-1 makes up the vast majority of residential areas, allowing duplexes would help meet the preponderance of Comp Plan goals and policies. The broader policy question is therefore which threatens the character of single-family neighborhoods more – the status quo related to the severe housing shortage or the potential impact of multi-family development at neighborhood edges and some duplexes in the neighborhood itself.

Section 2: Allowing ADUs with Kitchens in the R-1 zone district

The proposed amendment would allow accessory dwelling units (ADUs) with kitchens permissively in the R-1 zone district citywide and add a size limit of 750 square feet. ADUs without kitchens are currently a conditional use in R-1, so the proposed amendment would also make ADUs without kitchens permissive.

This citywide allowance and size limit would not apply in small areas that already allow ADUs either permissively or conditionally with their own special regulations in use-specific standards. (See table and figure below.)

Small Areas that Allow ADUs	Permissive (P) or Conditional (C)	Use-specific Standard
Barelas – CPO-1	C	14-16-4-3(F)(5)(e)2
Downtown Neighborhood Area – CPO-3	P	14-16-4-3(F)(5)(e)3
High Desert	P	14-16-4-3(F)(5)(e)4
Huning Highland	C	14-16-4-3(F)(5)(e)5
Sawmill/Wells Park – CPO-12	P	14-16-4-3(F)(5)(e)6
South Broadway	C	14-16-4-3(F)(5)(e)7
University Neighborhoods	C	14-16-4-3(F)(5)(e)8
Volcano Mesa – CPO-13	P	14-16-4-3(F)(5)(e)9

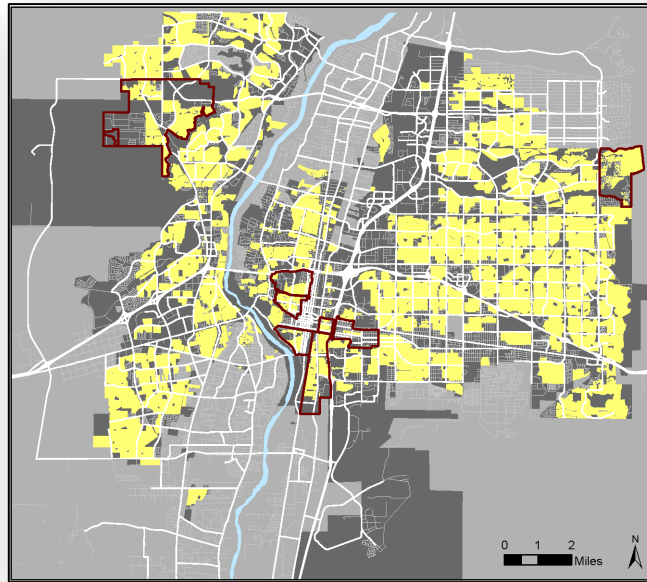


Figure 1: Properties Zoned R-1 and Small Areas Where ADUs are Currently Allowed

The proposed amendment would remove the existing allowance for ADUs to be permissive within 1,320 feet ($\frac{1}{4}$ mile) from Premium Transit (PT) and Main Street (MS) areas, since allowing ADUs citywide would render that allowance un-necessary.

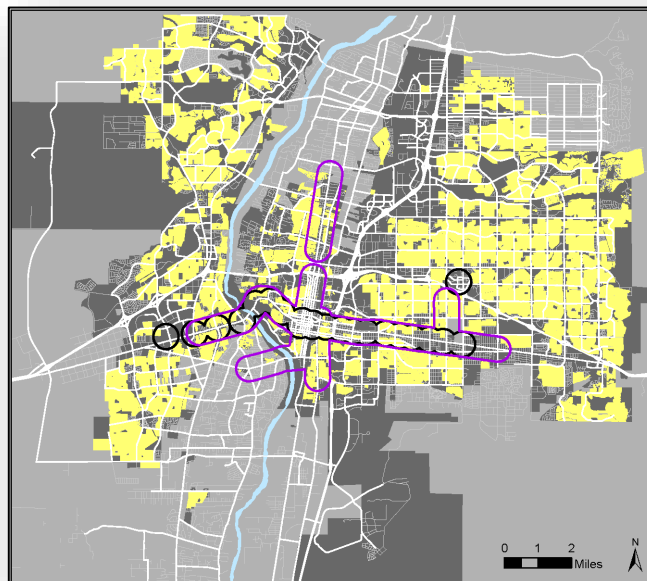


Figure 2: Properties Zoned R-1 and PT and MS Areas

The use-specific standard would note that ADUs accessory to single-family or two-family detached dwellings must be provided as an accessory building, i.e. not added to the existing structure. This proposed amendment eliminates a conflict between a second kitchen allowed in an existing dwelling unit, which is currently permissive, and an attached ADU, which is not allowed. As noted in the discussion in Section 1 above, from a land-use perspective, there is no way to distinguish these two uses, so the proposed amendment would clarify that both would be allowed in R-1. The proposed amendment provides a cross section to the second kitchen accessory use (i.e. allowing two units in a structure with shared spaces) and two-family detached dwelling (duplex) (i.e. allowing two units in a structure with no shared spaces within the building).

The proposed changes would also change the definition of an ADU to remove reference to attached and detached ADUs and add a reference to accessory buildings, which also have regulations in IDO Subsection 14-16-5-11(C)(4) that would limit the size, placement, and building height of ADUs accessory to single-family dwellings. For example, accessory buildings cannot be placed in a front setback and cannot occupy more than 25 percent of the side and rear yards combined. The accessory building regulations and the use-specific standard for ADUs would both apply, and the more restrictive provision would prevail in the case of conflicts.

While the proposed changes have raised objections from some members of the public, existing regulations would sufficiently limit ADU size and placement to prohibit them on lots that are too small. ADUs would only be allowed on lots where all requirements in both the use-specific standards and the accessory building standards can be met. Even if there are only a small number of ADUs built, the allowance gives the flexibility to homeowners who want and need them.

Parking is sometimes cited as an objection to adding ADUs in a neighborhood. The IDO requires one (1) off-street parking space for an ADU in Table 5-5-1.

As at least 1 commenter has noted, ADU construction costs would likely be too high for many households. In order to add ADUs to help add housing supply in developed neighborhoods, the City would need to provide additional incentives to property owners. Several cities have developed building permit sets that are pre-approved for property owners to use, eliminating the cost for an architect to design the ADU. The City might need to work with local lenders to identify policies and procedures that might need to change to allow property owners to take out loans to cover construction costs.

Several commenters have objected to the possibility that ADUs would be turned into rental units. Zoning is not very effective in regulating ownership or tenants. The Housing Forward initiative recommends amending a separate ordinance that regulates short-term rentals.

From the perspective of increasing housing supply, allowing ADUs in R-1 for those households that can afford to construct them, the additional housing provides flexibility to support multi-generational households and help to those who would benefit from rental income.

Policy Analysis: This amendment is consistent with the following Comprehensive Plan goals and policies in Community Identity, Land Use, and Housing.

Policy 4.1.1 Distinct Communities: Encourage quality development that is consistent with the distinct character of communities.

Policy 4.1.2 Identity and Design: Protect the identity and cohesiveness of neighborhoods by ensuring the appropriate scale and location of development, mix of uses, and character of building design.

Because of the modest scale, accessory dwelling units (ADUs) provide an incremental increase in the supply of housing that is consistent with the community character of existing residential neighborhoods.

The policy debate is whether “accessory” dwelling units when added to a “single-family” residential area is really allowing two families where only one is allowed currently and further, whether “character” is really about a single use – single-family homes – as opposed to the scale and design of a detached dwelling. The proposed amendment would require ADUs to be detached accessory buildings when accessory to a single-family or two-family detached dwelling. All three of these uses are detached, so arguably, all have the same character of building design as a housing type. Note that Policy 4.1.2 calls for a mix of uses in neighborhoods.

From a land use perspective, neighborhoods with a mix of housing options are more resilient, vibrant, family-friendly, and supportive of the larger community than neighborhoods with exclusively single-family houses, which work best for one type of family and that do not work as well for multi-generational families, extended families, and people at different life stages (e.g. families with college age students, single parents, or single people). Adding ADUs as an allowable use in R-1 will help make existing residential neighborhoods more family-friendly for these other types of families.

Policy 4.1.4 Neighborhoods: Enhance, protect, and preserve neighborhoods and traditional communities as key to our long-term health and vitality.

The existing shortage of housing is a threat to the safety and preservation of neighborhoods. The issues and challenges of addressing homelessness put other community characteristics at risk. The overriding objective of the Housing Forward initiative is to address this housing shortage with every strategy possible.

While adding ADUs are not directly intended to house people experiencing homelessness, adding housing supply at all income levels is expected to loosen housing pressure, allowing families to afford more housing. This proposed amendment, in combination with others proposed for the IDO and in separate Ordinances (e.g. short-term rental ordinance and public projects for the Gateway Center and hotel conversions) is intended to make fewer families at risk for homelessness and to make more options for those experiencing homelessness to transition to housing with supportive services that can address root causes, including poverty and mental health challenges.

Policy 5.1.1.g Desired Growth: Encourage residential infill in neighborhoods adjacent to Centers and Corridors to support transit ridership.

Policy 5.2.1 – Land Uses: Create healthy, sustainable, and distinct communities with a mix of uses that are conveniently accessible from surrounding neighborhoods.

5.2.1.d: Encourage development that broadens housing options to meet a range of incomes and lifestyles.

Policy 5.3.7 - Locally Unwanted Land Uses: Ensure that land uses that are objectionable to immediate neighbors but may be useful to society are located carefully and equitably to ensure that social assets are distributed evenly and social responsibilities are borne fairly across the Albuquerque area.

5.3.7.a: Minimize the impacts of locally unwanted land uses on surrounding areas through policies, regulations, and enforcement.

Goal 5.7 – Implementation Processes: Employ procedures and processes to effectively and equitably implement the Comp Plan.

Policy 5.7.2 – Regulatory Alignment: Update regulatory frameworks to support desired growth, high quality development, economic development, housing, a variety of transportation modes, and quality of life priorities.

The proposed amendment is consistent with these goals and policies because ADUs can be provided as a rental product, so allowing ADUs in R-1 will add a housing option for families that is not currently available in these locations. Multi-family dwellings (i.e. apartments) are more common as the rental product available to families. Even though multi-family dwellings are not allowed in R-1, multi-family dwellings bordering single-family neighborhoods are often objectionable to residents. Rental housing options are needed by many families, so they are social assets. Allowing ADUs in R-1 ensures that rental options are located equitably and distributed evenly across Albuquerque, since so much of Albuquerque is zoned R-1.

The existing regulations about setbacks and off-street parking ensure that duplexes will fit in appropriately to neighborhoods and minimize off-site impacts. Making duplexes permissive, as opposed to conditional, ensures that this necessary housing option is available where setbacks and parking standards can be met.

Goal 9.1 – Supply: Ensure a sufficient supply and range of high-quality housing types that meet current and future needs at a variety of price levels to ensure more balanced housing options.

Policy 9.1.1 – Housing Options: Support the development, improvement, and conservation of housing for a variety of income levels and types of residents and households.

9.1.1.a: Increase the supply of housing that is affordable for all income levels.

9.1.1.c: Assure the availability of a wide distribution of quality housing for all persons regardless of race, color, religion, sex, national origin, ancestry, age, or disabled status.

9.1.1.e: Provide for the development of quality housing for elderly residents.

9.1.1.f: Encourage community compounds to support multi-generational housing where such traditional development patterns exist.

9.1.1.g: Ameliorate the problems of homelessness, overcrowding, and displacement of low-income residents.

9.1.1.h: Maintain an affordable housing supply in neighborhoods, in addition to creating market-rate housing, as part of revitalization efforts.

Policy 9.1.2 Affordability: Provide for mixed-income neighborhoods by encouraging high-quality, affordable and mixed income housing options throughout the area.

9.1.2.b: Encourage a diversity of housing types, such as live/work spaces, stacked flats, townhouses, urban apartments, lofts, accessory dwelling units, and condominiums.

9.1.2.c: Encourage housing types that maintain the scale of existing single-family neighborhoods while expanding housing options.

The proposed amendment is consistent with these policies by broadening housing options in R-1 for families with a variety of income levels and generally allowing additional housing supply on 49 percent of the developable land with straight zoning in the city.

Where large families are currently living in one dwelling unit, adding an accessory dwelling unit would help ameliorate overcrowding. Where a family lives in one dwelling unit and rents the other dwelling unit, the rent can help to cover mortgage and living expenses, which is an anti-poverty and anti-displacement strategy for low-income residents.

ADUs also provide flexibility to accommodate multi-generational families, seniors, and people with disabilities who want to live independently without having to maintain an entire single-family house.

Some commenters with property in the R-A zone district requested that ADUs be allowed in R-A, where they are currently allowed as an accessory conditional use. This change would need to be made in Table 4-2-1.

Goal 9.3 Density: Support increased housing density in appropriate places with adequate services and amenities.

Policy 9.3.1 Centers and Corridors: Encourage higher density, multi-unit housing and mixed-use development in Downtown, Urban, Activity, and Village Centers, and along Premium and Major Transit Corridors to capture growth, relieve development pressure at the edge of the urban footprint, and maintain low densities in rural areas.

Policy 9.3.2 Other Areas: Increase housing density and housing options in other areas by locating near appropriate uses and services and maintaining the scale of surrounding development.

The proposed amendment supports these policies because it is intended to increase density in existing neighborhoods that already have services, amenities, and infrastructure. While additional people place extra burden on these existing areas, all areas require maintenance and investment over time. When public funds are inevitably needed for repairs, the cost per person will be lower. Serving existing development is by far more efficient than expanding services, infrastructure, and amenities to new areas.

As noted above, the policy debate will be about whether ADUs are the same scale of development as single-family homes. From a land use perspective, both are detached buildings and low-density residential uses.

The proposed amendment does not call for high-density housing options in low-density residential neighborhoods, so the amendment is not in conflict with Policy 9.3.1.

The proposed amendment conflicts with the following Comprehensive Plan policies:

Policy 5.6.3 Areas of Consistency: Protect and enhance the character of existing single-family neighborhoods, areas outside of Centers and Corridors, parks, and Major Public Open Space.

While public comments have expressed opposition to allowing accessory dwelling units in the R-1 zone district, it remains true that the City faces a significant gap between the housing needed and the housing available. The City boundary is essentially landlocked on the north, east, and south. Residential growth west of the river would only worsen congestion on river crossings, given the severe imbalance of jobs and housing on the West Side. The proposal to add accessory dwelling units in R-1, in particular, is a way to allow additional density and housing flexibility on properties that currently only allow a single dwelling unit, without changing the character of the built environment. While some public comments have expressed opposition to allowing additional rental opportunities in existing single-family neighborhoods, zoning is an ineffective tool to regulate ownership. In general, allowing ADUs to lessen the pressure of the existing housing shortage is a way of protecting existing single-family neighborhoods from the challenges they are experiencing now, which will only get worse as home prices and property values rise with no intervention.

Section 3: Kitchen Exemption for Conversions from Non-residential Development to Multi-family

The proposed amendment would extend the existing exemption from the definition of kitchen for affordable multi-family housing that is created by converting non-residential development in Mixed-use zone districts and eliminate the limit of 100 units.

The IDO defines a kitchen in Section 14-16-7-1 as follows:

Kitchen- An area of a dwelling where there is a sink of adequate size and shape for washing dishes and food items (as opposed to washing hands) and a cooking stove, range, or oven. The presence of a sink and a hot plate or microwave does not constitute a kitchen, unless specified otherwise in this IDO.

In general, converting non-residential buildings to multi-family development helps re-use existing buildings, particularly if they are vacant or under-utilized, as is the case for more and more office, retail, and hotel/motel buildings throughout Albuquerque. Re-using buildings saves on demolition and construction costs as well as the need for construction materials, which are resource-intensive. The resulting dwelling units can be “naturally affordable,” since rents do not have to be as high to cover construction costs.

Providing full kitchens with room for an oven and full-size refrigerator can be problematic when converting an existing building. The annual update in 2021 provided an exemption to the kitchen definition for projects that received funding from the City Department of Family and Community Services (DFCS) for up to 100 units. The use-specific standard established a different set of minimum standards for kitchens in converted units, as well as two requirements to provide “wraparound” services for tenants that would be enforced through developer agreements with DFCS.

The proposed amendment would open this provision to any multi-family development (i.e. eliminate the incentive for affordable housing) and eliminate the “wraparound service” requirements. This change is intended to incentivize more conversions to multi-family units. As noted above, more housing supply generally helps keep rents down, and avoiding the cost of construction is expected to result in units with lower rents.

Units without full kitchens can be attractive to younger people with active lifestyles who do not cook and older people who no longer cook, so this incentive could help increase housing options for people who do not want full stoves or full-size kitchens.

Note that this proposed amendment conflicts with the proposal in the 2022 annual update to eliminate the existing exemption for affordable housing. The policy issue seems to hinge on whether a kitchen without a stove and full-size refrigerator constitutes a “lesser kitchen” that results in substandard housing or whether these conversions constitute a “modern living” housing option at affordable levels that would be desirable for some people, if not others. In the case of the latter, it seems that people who desire this option would appreciate not paying more for a kitchen that they will not use. In the case of the former, the fact that the proposed change in O-22-54 removes the exclusive allowance for affordable housing only removes the potential stigma that people in affordable housing do not “deserve” a full kitchen.

Given the severe housing shortage, allowing this option for households at all income levels provides an additional source to increase housing supply.

Policy Analysis: This amendment is consistent with the following Comprehensive Plan Goals and policies in Land Use and Housing:

Policy 5.1.1.g Desired Growth: Encourage residential infill in neighborhoods adjacent to Centers and Corridors to support transit ridership.

Policy 5.2.1.h Land Uses: Encourage infill development that adds complementary uses and is compatible in form and scale to the immediately surrounding development.

Policy 5.2.1.n Land Uses: Encourage more productive use of vacant lots and under-utilized lots, including surface parking.

Goal 5.3- Efficient Development Patterns: Promote development patterns that maximize the utility of existing infrastructure and public facilities and the efficient use of land to support the public good.

Policy 5.3.1- Infill Development: Support additional growth in areas with existing infrastructure and public facilities.

Policy 5.3.7- Locally Unwanted Land Uses: Ensure that land uses that are objectionable to immediate neighbors but may be useful to society are located carefully and equitably to ensure that social assets are distributed evenly and social responsibilities are borne fairly across the Albuquerque area.

Policy 9.3.2 Other Areas [versus Centers and Corridors]: Increase housing density and housing options in other areas by locating near appropriate uses and services and maintaining the scale of surrounding development.

The proposed amendment is consistent with these policies because it provides an incentive to re-use existing and under-utilized or vacant non-residential buildings and converting them to multi-family uses in locations that are surrounded by existing services and already have necessary infrastructure.

The Mixed-use zone districts are intended for that purpose. Adding residents to areas with non-residential uses can help support surrounding businesses. Existing parking for non-residential uses can often be shared with residential uses, since most residents are away during the day when most businesses are the most active and home in the evening and at night, when most businesses are closed.

While additional people place extra burden on these existing areas, all areas require maintenance and investment over time. When public funds are inevitably needed for repairs, the cost per person will be lower. Serving existing development is by far more efficient than expanding services, infrastructure, and amenities to new areas.

Given the housing shortage and the need for additional rental housing, converting existing non-residential buildings to multi-family can help relieve the need for new multi-family development, which is often objectionable to nearby neighbors. These conversions will help add housing options in existing commercial areas throughout Albuquerque.

Policy 9.1.1 Housing Options: Support the development, improvement, and conservation of housing for a variety of income levels and types of residents and households.

9.1.1.a: Increase the supply of housing that is affordable for all income levels.

9.1.1.i: Provide for the development of multi-family housing close to public services, transit, and shopping.

Policy 9.1.2 Affordability: Provide for mixed-income neighborhoods by encouraging high-quality, affordable and mixed income housing options throughout the area.

9.1.2.b: Encourage a diversity of housing types, such as live/work spaces, stacked flats, townhouses, urban apartments, lofts, accessory dwelling units, and condominiums.

Goal 9.6 Development Process: Promote cost-effective housing redevelopment and construction that meets community needs.

Policy 9.6.1 Development Cost: Reduce development costs and balance short-term benefits of delivering less costly housing with long-term benefits of preserving investment in homes and protecting quality of life.

The proposed amendment is consistent with these goals and policies because conversions can be less expensive than new construction, resulting in dwelling units that can be “naturally affordable” because they do not have to cover construction costs.

Because these dwelling units do not have to have a full kitchen with stove and full-size refrigerator, the rents may be more affordable and more attractive to families and individuals that do not want or no longer need a full kitchen.

The proposed amendment conflicts with the following Comprehensive Plan policies:

Goal 5.1 Centers & Corridors: Grow as a community of strong Centers connected by a multi-modal network of Corridors.

Policy 5.1.1 Desired Growth: Capture regional growth in Centers and Corridors to help shape the built environment into a sustainable development pattern.

Policy 5.1.2 Development Areas: Direct more intense growth to Centers and Corridors and use Development Areas to establish and maintain appropriate density and scale of development within areas that should be more stable.

Policy 5.2.1.f.i Land Uses: Encourage higher density housing as an appropriate use within designated Centers and Corridors.

Policy 5.6.2 Areas of Change: Direct growth and more intense development to Centers, Corridors, industrial and business parks, and Metropolitan Redevelopment Areas where change is encouraged.

Policy 6.1.2 Transit-Oriented Development: Prioritize transit-supportive density, uses, and building design along Transit Corridors.

Policy 6.1.3 Auto Demand: Reduce the need for automobile travel by increasing mixed-use development, infill development within Centers, and travel demand management (TDM) programs.

Policy 9.3.1 Centers and Corridors: Encourage higher density, multi-unit housing and mixed-use development in Downtown, Urban, Activity, and Village Centers, and along Premium and Major Transit Corridors to capture growth, relieve development pressure at the edge of the urban footprint, and maintain low densities in rural areas.

The proposed amendment does not differentiate between Centers and Corridors and other areas. It would incentivize adding multi-family dwellings throughout Albuquerque in existing non-residential buildings in the Mixed-use zones.

Staff recommends keeping a limit on the number of units that can be converted outside of Areas of Change but removing the limit in Areas of Change, which by policy includes the most appropriate locations to absorb intense development and higher densities. Areas of Change include Urban Centers (UC), Main Street areas (MS), Premium Transit areas (PT), Major Transit Corridors (MT), Activity Centers (AC), some Metropolitan Redevelopment Areas, and existing business parks. (See figure below.)

The proposed amendment could go further to allow conversions to multi-family in the NR-BP zone district as a Conditional Vacant use (CV) in Table 4-2-1. This allowance would further Policy 5.2.1.n Land Uses by incentivizing the re-use of vacant buildings without undermining the purpose of NR-BP, which is to allocate land that keeps business and employment as the top priorities.

Goal 9.5 Vulnerable Populations: Expand capacity to provide quality housing and services to vulnerable populations.

The proposed text amendment would eliminate a regulation that currently applies exclusively to affordable housing and requires supportive services to be incorporated, which is intended to help a vulnerable population of underhoused people by allowing conversions to be done more affordably and thereby increasing the availability of housing and services to address homelessness. While the proposed text amendment would still allow these conversions, and services could still be incorporated in affordable housing projects constructed in a Mixed-use zone, the proposed change generally conflicts with Goal 9.5- Vulnerable Populations.

As noted above, Staff recommends keeping a limit on the number of units that can be converted in Areas of Consistency. The limit could be reduced to 50 dwelling units, but any units provided as affordable to households at or below 80 percent of the Area Median Income (AMI) would not count against that limit, and each affordable unit could allow an additional market-rate unit above the 50-unit maximum. (See example below.)

The advantage of this approach would be to maintain an incentive for providing affordable units and an incentive for creating mixed-rate multi-family development projects. Each market-rate unit can help supplement the discounted rent from the affordable unit.

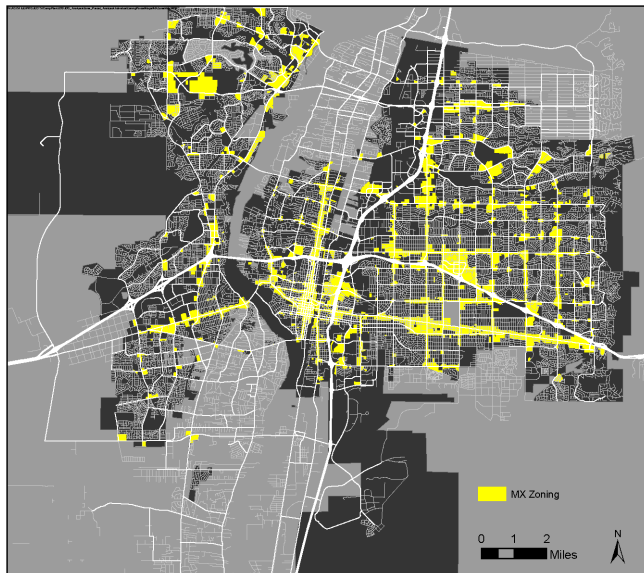


Figure 3: Mixed-use Zone Districts

Proposed amendment would apply in all Mixed-use zones with no limit on the number of units

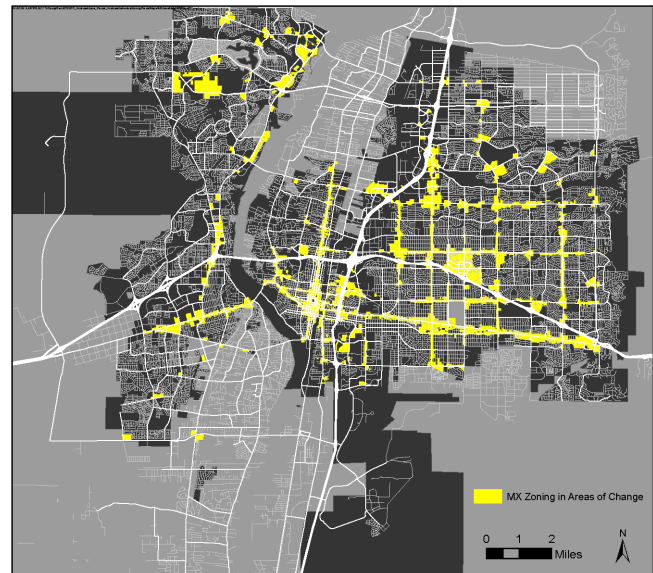


Figure 4: Mixed-use Zone Districts in Areas of Change

Staff recommendation would apply the exemption in Areas of Change with no limit on the number of units

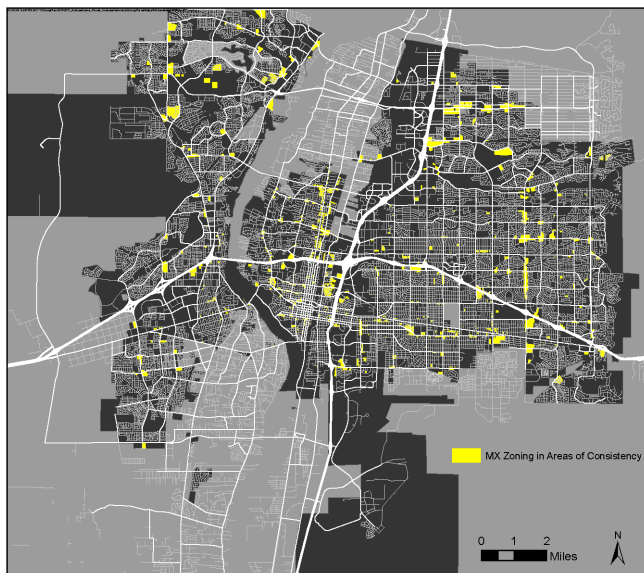


Figure 5: Mixed-use Zone Districts in Areas of Consistency

Staff recommendation would be to limit the number of units in Areas of Consistency

Limit: 50 dwelling units (market rate)

Dwelling units affordable to households at or below 50 percent of Area Median Income (AMI) would not count against the limit

Each affordable unit would allow another market-rate unit above the limit

Example:

*50 market rate units
 + 25 affordable units
 + 25 additional market-rate units
 100 mixed-income units in the conversion*

Section 4: Eliminating Building Height Maximums for Multi-family and Mixed-use Development in Mixed-use Zone Districts

The request proposes to eliminate building height maximums in Mixed-use zones (e.g. MX-T, MX-L, MX-M, and MX-H) for multi-family and mixed-use development. (See Figure 3 for map.)

The rationale for the proposed change is that allowing additional height could result in additional multi-family units, although the proposed change would not *require* additional units or taller projects. Developments could use the additional height allowed by this proposed change to make each story taller without adding any dwelling units or to allow additional stories for non-residential uses. Each additional dwelling unit typically helps the project cover the cost of construction and maintenance, so it is possible that allowing taller buildings would be an incentive to add dwelling units in additional stories.

Multi-family development is generally the most cost-effective housing type per dwelling unit because of shared walls and roof. Multi-family development is most often, but not necessarily, provided as rental units. For these reasons, multi-family is an important housing type to incentivize in order to ensure the full range of housing options in Albuquerque and increase the supply of what is often the source of “naturally affordable” (i.e. unsubsidized but still affordable to households with a range of income levels).

Building height maximums are established in Table 5-1-2 of the IDO and differ for each of the zone districts above, as the zones are meant to allow development at different levels of density and intensity. The proposed change would eliminate that differential in the zone districts for multi-family development and for non-residential development that includes a residential component (i.e. mixed-use development as defined by IDO Section 14-16-7-1).

The proposed change eliminates the taller building height by right that is allowed in Centers and Corridors (specifically, Urban Centers, Main Streets, and Premium Transit areas or UC-MS-PT), which the City has established by policy are the most appropriate locations for the most dense and intense development.

Table 5-1-2 currently provides between 1-3 stories in bonus building height for projects that provide workforce housing (i.e. housing affordable to households at or below 80% of the Area Median Income for Albuquerque) and/or parking structures. This bonus height is allowed beyond the maximum building height for each zone district, so the distinctions between the zone districts is maintained. In addition to eliminating the differences between zone districts, the proposed change also eliminates the existing incentive for providing affordable housing and parking structures.

The proposed change would apply in both Areas of Change, which the City has established by policy as appropriate to attract growth and development, and Areas of Consistency. By policy, development in Areas of Consistency is encouraged to reinforce the scale and character of existing development.

One potential consequence of the proposed change would be to further challenge ABQ Ride's public transit system. Albuquerque's low-density development pattern combined with its 100 square mile service area makes efficient and cost-effective public transit all but impossible to provide. The Center and Corridor approach to development over time helps to direct development to districts that are easier to serve by transit.

Albuquerque's market for development is not sufficient to add density evenly throughout the city, which would justify and support transit service throughout the network. Until the market and the transit network are sufficient to support such development throughout the city, it makes more sense to incentivize taller buildings, and therefore higher densities, where growth is designated by the Comp Plan as appropriate areas, which transit service can be planned and designed to accommodate.

Similar consideration extends to other public facilities, services, and amenities. The Centers and Corridors strategy encourages additional development where public investment in libraries, community centers, infrastructure, etc. has already occurred, and it helps service providers anticipate where additional growth will need to be accommodated. Directing additional multi-family development to Centers and Corridors helps ensure that infrastructure and services will be available for new residents, and additional residents in these areas can help support retail, services, and other private investments to create vibrant and sustainable districts.

The planning profession is talking about 15-minute cities right now – the idea that high-quality of life results from being able to walk 15 minutes or less to meet most, if not all, of your daily needs. Again, given Albuquerque's spread-out development pattern, the best way to achieve 15-minute cities is to concentrate development into districts connected by vibrant, multi-modal corridors.

A possible objection to the proposed change is tall buildings looming over development in neighboring Residential zones. Neighborhood edges in IDO Section 14-16-5-9 would require a transition in building height within 100 feet of a protected lot (i.e. lot with low-density residential development zoned R-A, R-1, R-MC, or R-1). This protection would not apply to development in R-ML and R-MH, which are often located next to Mixed-use zone districts as an appropriate transition to the lower-density zone districts.

The proposed amendment may not be useful beyond allowing 7 stories (which generally speaking can be assumed at 12 feet per story above the ground floor, which is typically 15 feet). The cost of construction jumps at 3 stories, when ADA standards generally require elevators, which are expensive. The International Building Code generally allows all-wood construction up to 4 stories or 5 stories of wood construction over 2 stories constructed with concrete and steel (commonly referred to as "5 over 2"). Beyond 7 stories, the International Building Code requires all-steel structures. Steel is much more expensive than wood; residential rents in Albuquerque currently would not cover the cost of all-steel construction. The cost for constructing between 3-7 stories is generally only a factor of the cost of construction materials. Beyond 7 stories, the International Building Code requires steel construction. The "sweet spot" for incentivizing additional units is an additional story for all-wood construction and every story above the steel/concrete podium for

building up to 7 stories. Height allowed above 7 stories is unlikely to be used in the current market.

Policy Analysis: The proposed amendment is consistent with the following Comprehensive Plan goals and policies in Land Use and Housing:

Goal 5.3- Efficient Development Patterns: Promote development patterns that maximize the utility of existing infrastructure and public facilities and the efficient use of land to support the public good.

Policy 5.3.1- Infill Development: Support additional growth in areas with existing infrastructure and public facilities.

Policy 5.3.7- Locally Unwanted Land Uses: Ensure that land uses that are objectionable to immediate neighbors but may be useful to society are located carefully and equitably to ensure that social assets are distributed evenly and social responsibilities are borne fairly across the Albuquerque area.

The proposed amendment would further these policies because it provides an incentive to add multi-family development in Mixed-use zone districts, which are intended to create districts where residents are close to services – to be served and to support local businesses – and where both can be efficiently served by infrastructure and public facilities.

While additional people place extra burden on these existing areas, all areas require maintenance and investment over time. When public funds are inevitably needed for repairs, the cost per person will be lower. Serving existing development is by far more efficient than expanding services, infrastructure, and amenities to new areas.

Given the housing shortage and the need for additional rental housing, the proposed amendment is intended to result in more multi-family development, which is often objectionable to nearby neighbors. Because the proposed amendment would apply in all Mixed-use zone districts, the amendment would help distribute rental housing options throughout Albuquerque.

Policy 9.1.1- Housing Options: Support the development, improvement, and conservation of housing for a variety of income levels and types of residents and households.

9.1.1.i: Provide for the development of multi-family housing close to public services, transit, and shopping.

Policy 9.1.2 Affordability: Provide for mixed-income neighborhoods by encouraging high-quality, affordable and mixed-income housing options throughout the area.

Goal 9.6 Development Process: Promote cost-effective housing redevelopment and construction that meets community needs.

Policy 9.6.1 Development Cost: Reduce development costs and balance short-term benefits of delivering less costly housing with long-term benefits of preserving investment in homes and protecting quality of life.

The proposed amendment is consistent with these goals and policies by providing an incentive for more multi-family development. Generally, shared walls, roof, hallways, and common areas lower construction cost per dwelling unit, and each additional unit helps cover construction costs. Multi-family is therefore often the most cost-effective housing option, which can result in rents that are lower than mortgage payments. Because the supply of single-family housing in Albuquerque is much larger than multi-family housing, rents for multi-family can be more than single-family rentals. Multi-family is also often provided in areas near transit and other public facilities and services. “Location location location,” as the saying goes, often drives rental costs. Multi-family is the most efficient way to meet market demands for people to live near goods and services and enjoy a walkable, bikeable lifestyle.

Providing more multi-family on the supply side should generally lower rents, which helps meet the affordability policy.

The proposed amendment conflicts with the following Comprehensive Plan goals and policies in Community Identity, Land Use, and Housing.

Goal 5.1 Centers & Corridors: Grow as a community of strong Centers connected by a multi-modal network of Corridors.

Policy 5.1.1 Desired Growth: Capture regional growth in Centers and Corridors to help shape the built environment into a sustainable development pattern.

Policy 5.1.1.g Desired Growth: Encourage residential infill in neighborhoods adjacent to Centers and Corridors to support transit ridership.

Policy 5.1.2 Development Areas: Direct more intense growth to Centers and Corridors and use Development Areas to establish and maintain appropriate density and scale of development within areas that should be more stable.

Policy 5.2.1.f.i Land Uses: Encourage higher density housing as an appropriate use within designated Centers and Corridors.

Policy 5.2.1.f.ii Land Uses: Encourage higher density housing as an appropriate use in areas with good street connectivity and convenient access to transit.

Policy 5.7.2 - Regulatory Alignment: Update regulatory frameworks to support desired growth, high quality development, economic development, housing, a variety of transportation modes, and quality of life priorities.

Policy 6.1.2 Transit-Oriented Development: Prioritize transit-supportive density, uses, and building design along Transit Corridors.

Policy 6.1.3 Auto Demand: Reduce the need for automobile travel by increasing mixed-use development, infill development within Centers, and travel demand management (TDM) programs.

Policy 9.1.1.i Housing Options: Provide for the development of multi-family housing close to public services, transit, and shopping.

Policy 9.1.2.d Affordability: Encourage the development of higher-density affordable and mixed-income housing in Downtown, near job centers, and along transit corridors.

Policy 9.3.1 Centers and Corridors: Encourage higher density, multi-unit housing and mixed-use development in Downtown, Urban, Activity, and Village Centers, and along Premium and Major Transit Corridors to capture growth, relieve development pressure at the edge of the urban footprint, and maintain low densities in rural areas.

The proposed amendment does not differentiate between Centers and Corridors and other areas or between Areas of Change and Consistency. It would incentivize adding multi-family dwellings throughout Albuquerque in Mixed-use zone districts. As noted above, this undermines the spirit and intent of the Comprehensive Plan, which adopts the Centers and Corridors approach as the community vision and land use/development strategy. It also further challenges the provision of services to new residents for transit and public facilities, which are planned for and organized based on the Centers and Corridors pattern of growth and development.

To eliminate this conflict, but still incentivize multi-family development, Staff recommends keeping the maximum building height in Table 5-1-2 but adjusting the proposed amendment to instead amend the use-specific standard for multi-family dwellings to allow 24 additional feet of building height (i.e. 2 extra stories) in Areas of Change and 12 feet of building height (i.e. 1 extra story) in Areas of Consistency. Staff recommends removing R-ML and MX-T from this additional height, as these zone districts are intended to have lower densities than R-MH and the other Mixed-use zone districts. The use-specific standard would apply this provision to R-MH, MX-L, MX-M, and MX-H zone districts.

This approach would also eliminate one complication of the proposed amendment. As written, the amendment would allow unlimited building height for “mixed-use development,” which the IDO defines as a mix of non-residential and residential uses on a lot. If the recommendation above does not move forward, the language in the proposed amendment should be edited to read “vertical mixed-use development (i.e. mixed-use building).” In addition, the definition of Mixed-use Development in IDO Section 14-16-7-1 should be edited to add, “unless specified otherwise in this IDO.”

Policy 9.1.2 Affordability: Provide for mixed-income neighborhoods by encouraging high-quality, affordable and mixed-income housing options throughout the area.

Goal 9.5 Vulnerable Populations: Expand capacity to provide quality housing and services to vulnerable populations.

The proposed text amendment would eliminate an incentive for workforce housing. Table 5-1-2 includes a workforce housing bonus of 12 feet in all Mixed-use zones. While the proposed text amendment would still allow workforce housing as an option for a multi-family

development, but the regulatory incentive to provide permanently affordable housing would be eliminated; therefore, the proposed amendment would conflict with the above goal and policy.

To avoid this conflict, Staff recommends keeping the existing Workforce Housing bonus in Table 5-1-2 and adding an additional 12 feet in the MX-L, MX-M, and MX-H zone districts, keeping the bonus for MX-T at 12 feet, since the MX-T zone district is intended to provide a transition from the Residential zone districts that allow up to 26 feet.

In combination with the recommendation to allow taller buildings for multi-family development in the use-specific standard, the proposed amendment would potentially allow the additional height that gets to the “sweet spot” to incentivize multi-family up to 7 stories without over-entitling development with building height that would go unused or that would not result in affordable housing.

Goal: 4.1 Character: Enhance, protect, and preserve distinct communities.

Policy 4.1.2 Identity and Design: Protect the identity and cohesiveness of neighborhoods by ensuring the appropriate scale and location of development mix uses, and character-building design.

Policy 4.1.4 Neighborhoods: Enhance, protect, and preserve neighborhoods and traditional communities as key to our long-term health and vitality.

Policy 5.2.1.h Land Uses: Encourage infill development that adds complementary uses and is compatible in form and scale to the immediately surrounding development.

Policy 5.6.4 Appropriate Transitions: Provide transitions in Areas of Change for development abutting Areas of Consistency through adequate setbacks, buffering, and limits on building height and massing.

Policy 9.3.2 Other Areas [versus Centers and Corridors]: Increase housing density and housing options in other areas by locating near appropriate uses and services and maintaining the scale of surrounding development.

The proposed amendment would allow tall buildings on any Mixed-use zone district, regardless of surrounding development or the allowable building height in neighboring zone districts. The Neighborhood Edge provision in IDO Subsection 14-16-5-9 would limit building height to 30 feet within 100 feet of protected lots zoned R-A, R-1, R-MC, or R-T with low-density residential development, which does require a transition to a larger scale, the provision would still potentially allow development at much larger scale than surrounding areas.

Currently, the IDO uses differences in the building height maximums allowed by the different zone districts that allow uses beyond low-density residential development to ensure development at appropriate scale and location. By eliminating the differential across Mixed-use zone districts for multi-family development to allow unlimited building height, and in the

absence of regulations to require a transition between development in R-ML (with a maximum building height of 38 feet) and R-MH (with a maximum building height of 48 feet citywide or 65 feet in UC-MS-PT areas), the proposed amendment eliminates the predictability of zoning allowances and the purpose of the different zone districts, which are currently the primary strategy for controlling the form and scale of development; therefore, the proposed amendment conflicts with these goal and policies.

To avoid this conflict, staff recommends adding a new regulation to Neighborhood Edges in Subsection 14-16-5-9 that would require a transition between R-ML and R-MH as protected lots and development in the Mixed-use zone districts as regulated lots. Similar to the structure for the existing Neighborhood Edge provision, the new provision could be written to apply within 50 feet of the protected lot citywide (the distance for UC-MS-PT in the existing Neighborhood Edge provisions) and limit building height above 48 feet (the maximum building height citywide in R-MH and in MX-M) on regulated lots. Together with the Staff recommendation to change the proposed amendment from unlimited building height to a maximum of 24 additional feet in Centers and Corridors or 12 feet citywide, the intent of the amendment would be met while ensuring the appropriate scale and location of multi-family development.

Section 5: Exempting Affordable Housing from Off-Street Parking Requirements

The proposed amendment would exempt affordable housing from off-street parking requirements. The rationale for this change is that eliminating the off-street parking requirement could reduce housing costs, providing an incentive to construct more affordable housing. Providing parking is a significant cost for a development project, and the City's off-street parking requirements may be higher than the amount of parking needed for a particular development project based on market demand and anticipated tenants. Eliminating the City requirement would leave the amount of parking to be determined for each project based on the market and requirements of funders.

The IDO currently exempts some small areas from off-street parking requirements in Subsection 14-16-5-5(B)(2)(a). The proposed amendment would add an exemption for multi-family or mixed-use development that provides at least 20 percent of dwelling units as affordable to households at or below 50 percent of the Area Median Income (AMI) for Albuquerque as calculated by the U.S. Department of Housing and Urban Development (HUD). The IDO defines Mixed-use Development in Section 14-16-7-1 as follows:

Mixed-use Development- Properties with residential development and non-residential development on a single lot or premises. For the purposes of this IDO, mixed-use development can take place in the same building (i.e. vertical mixed-use) or separate buildings on the same lot or premises (i.e. horizontal mixed-use).

As written, the proposed amendment would exempt the non-residential uses in a mixed-use project from parking requirements, as well.

Note that a proposed amendment in the 2022 annual update related to parking maximums would prohibit surface parking in the areas that are exempt from parking requirements, specifically

Downtown, Old Town, and McClellan Park. The language in the annual update should be carefully reviewed in tandem with the proposed exemption for affordable housing to avoid prohibiting parking associated with affordable housing in these areas and citywide. Underground and structured parking is extraordinarily expensive. Affordable housing could become infeasible in locations where providing parking is still necessary for residents.

Many households that would benefit from affordable housing are also transit-dependent. The cost of owning and maintaining a vehicle, much less multiple vehicles, may be prohibitively expensive, so low-income households are more likely to need to be close to transit, particularly for households with multiple family members.

The IDO currently reduces parking requirements near transit as an incentive for development that can support, and be supported by, public transit.

Reduction	Location or Distance	Peak Service Frequency
50%	Premium Transit (PT) areas	≤ 15 min
30%	Within ¼ mile of stop/station	≤ 15 min
10%	Within 330 feet of stop/station	≤ 45 min

ABQ Ride is struggling to maintain service on many routes that connect residential areas farthest from Downtown and major corridors. The proposed amendment would undermine the incentive for developing near existing transit stations and stops and allow affordable housing development without parking in areas that may not be served by transit.

Conversely, affordable housing projects that provide less parking incentivize residents to use transit, so development projects that are located near transit both help support, and be supported by, public transit.

Policy Analysis: This amendment is consistent with the following Comprehensive Plan goals and policies in Land Use and Housing:

Policy 5.1.1.g Desired Growth: Encourage residential infill in neighborhoods adjacent to Centers and Corridors to support transit ridership.

Policy 5.2.1 – Land Uses: Create healthy, sustainable, and distinct communities with a mix of uses that are conveniently accessible from surrounding neighborhoods.

5.2.1.d: Encourage development that broadens housing options to meet a range of incomes and lifestyles.

Policy 5.7.2 – Regulatory Alignment: Update regulatory frameworks to support desired growth, high quality development, economic development, housing, a variety of transportation modes, and quality of life priorities.

Goal 9.1 – Supply: Ensure a sufficient supply and range of high-quality housing types that meet current and future needs at a variety of price levels to ensure more balanced housing options.

Policy 9.1.1 – Housing Options: Support the development, improvement, and conservation of housing for a variety of income levels and types of residents and households.

9.1.1.a: Increase the supply of housing that is affordable for all income levels.

Policy 9.1.2 Affordability: Provide for mixed-income neighborhoods by encouraging high-quality, affordable and mixed income housing options throughout the area.

Goal 9.6 Development Process: Promote cost-effective housing redevelopment and construction that meets community needs.

Policy 9.6.1- Development Cost: Reduce development costs and balance short-term benefits of delivering less costly housing with long-term benefits of preserving investment in homes and protecting quality of life.

The proposed amendment is consistent with these policies by incentivizing affordable housing, reducing development costs, and lessening the subsidy needed to keep rents, which generally cover development costs, affordable. Providing off-street parking adds considerably to housing costs, which are passed on to the renter or buyer. Providing an exemption for affordable housing may help to reduce development costs and reduce rents. Affordable housing projects could still provide off-street parking; the proposed amendment removes the City requirement for parking and lets the amount of parking to be determined on market conditions for construction, financing, and rents.

The proposed amendment conflicts with the following Comprehensive Plan policies in Community Identity, Land Use, Urban Design, and Housing:

Policy 4.1.4 Neighborhoods: Enhance, protect, and preserve neighborhoods and traditional communities as key to our long-term health and vitality.

Policy 7.4.1 Parking Strategies: Provide parking options, optimize parking efficiencies, and plan for parking as essential infrastructure.

Reduced off street parking could result in spillover parking in nearby neighborhoods. This can be addressed with parking management strategies, many of which are already in place and managed by the Parking Division in the Department of Municipal Development. The City might need to invest in public parking structures, incentivize parking districts, install parking meters in residential areas with multi-family dwellings, and/or adapt the existing residential neighborhood permit program to better address conflicts between low-density and high-density residential development.

Staff recommends editing the amendment to replace “multi-family or mixed-use development” with “multi-family dwellings.” This change would exempt the multi-family units but not the non-residential uses from parking requirements per Table 5-5-1 for the relevant land use.

Goal 5.1 Centers & Corridors: Grow as a community of strong Centers connected by a multi-modal network of Corridors.

Policy 5.1.1 Desired Growth: Capture regional growth in Centers and Corridors to help shape the built environment into a sustainable development pattern.

Policy 5.1.2 Development Areas: Direct more intense growth to Centers and Corridors and use Development Areas to establish and maintain appropriate density and scale of development within areas that should be more stable.

Policy 5.2.1.f.i Land Uses: Encourage higher density housing as an appropriate use within designated Centers and Corridors.

Policy 5.2.1.f.ii Land Uses: Encourage higher density housing as an appropriate use in areas with good street connectivity and convenient access to transit.

Policy 5.6.2 Areas of Change: Direct growth and more intense development to Centers, Corridors, industrial and business parks, and Metropolitan Redevelopment Areas where change is encouraged.

Policy 5.7.2 - Regulatory Alignment: Update regulatory frameworks to support desired growth, high quality development, economic development, housing, a variety of transportation modes, and quality of life priorities.

Policy 6.1.2 Transit-Oriented Development: Prioritize transit-supportive density, uses, and building design along Transit Corridors.

Policy 6.1.3 Auto Demand: Reduce the need for automobile travel by increasing mixed-use development, infill development within Centers, and travel demand management (TDM) programs.

Policy 9.1.1.i Housing Options: Provide for the development of multi-family housing close to public services, transit, and shopping.

Policy 9.1.2.d Affordability: Encourage the development of higher-density affordable and mixed-income housing in Downtown, near job centers, and along transit corridors.

Policy 9.3.1 Centers and Corridors: Encourage higher density, multi-unit housing and mixed-use development in Downtown, Urban, Activity, and Village Centers, and along Premium and Major Transit Corridors to capture growth, relieve development pressure at the edge of the urban footprint, and maintain low densities in rural areas.

The proposed amendment does not differentiate between Centers and Corridors and other areas. It would incentivize adding affordable multi-family development throughout Albuquerque in R-ML, R-MH, and Mixed-use zone districts. As noted above, this undermines the spirit and intent of the Comprehensive Plan, which adopts the Centers and Corridors approach as the community vision and land use/development strategy. It also further challenges the provision of services to new residents for transit and public facilities, which are planned for and organized based on the Centers and Corridors pattern of growth and development.

To eliminate this conflict, but still incentivize affordable multi-family development, Staff recommends adjusting the proposed amendment to only apply within an Area of Change (which includes Centers and Corridors).

Section 6: Reducing Parking Requirements for Multi-Family Dwellings

The proposed amendment would provide a reduction of 75 percent for multi-family and mixed-use development in Mixed-use zone districts. The rationale for this change is that reducing the off-street parking requirement could reduce housing costs, providing an incentive to construct more multi-family housing. Providing parking is a significant cost for a development project, and the City's off-street parking requirements may be higher than the amount of parking needed for a particular development project based on market demand and anticipated tenants. Reducing parking requirements only in Mixed-use zones, as opposed to including Residential zone districts that also allow multi-family development (i.e. R-ML and R-MH), avoids the potential of impacting residents in established neighborhoods.

The IDO currently establishes off-street parking requirements in Table 5-5-1 as appropriate for each land use. Parking requirements for multi-family development outside of Centers and Corridors tracks with the number of bedrooms in each dwelling unit. The parking requirement for multi-family in Urban Centers, Main Street areas, and Premium Transit areas (UC-MS-PT) is 1 space per dwelling unit, which is already a 55 percent reduction from the 1.8 spaces required for a 3-bedroom unit citywide. No parking is required in the Downtown Center. Note that an associated proposed amendment in the IDO annual update would prohibit off-street parking to be provided Downtown on a surface lot.

In IDO Subsection 14-16-5-5(C)(5)(b), development in other Centers and Corridors can be reduced by 20 percent. The IDO also currently reduces parking for development near transit, as noted in Section 5 above for the parking exemption for affordable housing, in IDO Subsection 14-16-5-5(C)(5)(c). The proposed amendment would replace that incentive for multi-family development with the straight reduction for multi-family development regardless of the location.

The proposed parking reduction for multi-family is not limited to Centers and Corridors, which are the locations designated by policies in the Comp Plan as the most appropriate place for additional development and density. As noted in Section 4 above for the proposed change to eliminate building height maximums, one potential consequence of the proposed change would be to exacerbate the existing challenge of providing an effective and efficient public transit system by incentivizing multi-family development outside of Centers and Corridors, where public services, facilities, transit, and private investment are directed by the vision, goals, and policies of the adopted Comprehensive Plan.

The IDO also includes a parking reduction if a parking study is conducted for a particular development and finds that less off-street parking is required based on the market and anticipated tenants than the City's requirements in Table 5-5-1. The City is not currently tracking how often this provision is used, but it would be helpful to gather this information as a feedback loop about the feasibility of the City's requirements.

Policy Analysis: This amendment is consistent with the following Comprehensive Plan goals and policies related to Land Use and Housing.

Policy 5.1.1.g Desired Growth: Encourage residential infill in neighborhoods adjacent to Centers and Corridors to support transit ridership.

Policy 5.2.1 – Land Uses: Create healthy, sustainable, and distinct communities with a mix of uses that are conveniently accessible from surrounding neighborhoods.

5.2.1.d: Encourage development that broadens housing options to meet a range of incomes and lifestyles.

Goal 9.1 – Supply: Ensure a sufficient supply and range of high-quality housing types that meet current and future needs at a variety of price levels to ensure more balanced housing options.

Policy 9.1.1 – Housing Options: Support the development, improvement, and conservation of housing for a variety of income levels and types of residents and households.

9.1.1.a: Increase the supply of housing that is affordable for all income levels.

Policy 9.1.2 Affordability: Provide for mixed-income neighborhoods by encouraging high-quality, affordable and mixed income housing options throughout the area.

Goal 9.6 Development Process: Promote cost-effective housing redevelopment and construction that meets community needs.

Policy 9.6.1- Development Cost: Reduce development costs and balance short-term benefits of delivering less costly housing with long-term benefits of preserving investment in homes and protecting quality of life.

The proposed amendment would further these policies by providing an incentive for multi-family development in Mixed-use zone districts throughout Albuquerque. By potential reducing development costs, rents could be lower and more “naturally affordable.”

The proposed amendments conflict with the following Comprehensive Plan policies for Community Identity, Land Use, Urban Design, and Housing:

Policy 4.1.4 Neighborhoods: Enhance, protect, and preserve neighborhoods and traditional communities as key to our long-term health and vitality.

Policy 7.4.1 Parking Strategies: Provide parking options, optimize parking efficiencies, and plan for parking as essential infrastructure.

As noted above, reduced off street parking could result in spillover parking in nearby neighborhoods. This can be addressed with parking management strategies, many of which are already in place and managed by the Parking Division in the Department of Municipal Development. The City might need to invest in public parking structures, incentivize parking districts, install parking meters in residential areas bordering Mixed-use zoning districts, and/or adapt the existing residential neighborhood permit program to better address conflicts between low-density and high-density residential development.

The proposed amendment would replace an existing reduction for providing public parking, which helps incentivize parking that benefit surrounding businesses and residential areas.

Goal 5.1 Centers & Corridors: Grow as a community of strong Centers connected by a multi-modal network of Corridors.

Policy 5.1.1 Desired Growth: Capture regional growth in Centers and Corridors to help shape the built environment into a sustainable development pattern.

Policy 5.1.2 Development Areas: Direct more intense growth to Centers and Corridors and use Development Areas to establish and maintain appropriate density and scale of development within areas that should be more stable.

Policy 5.2.1.f.i Land Uses: Encourage higher density housing as an appropriate use within designated Centers and Corridors.

Policy 5.2.1.f.ii Land Uses: Encourage higher density housing as an appropriate use in areas with good street connectivity and convenient access to transit.

Policy 5.6.2 Areas of Change: Direct growth and more intense development to Centers, Corridors, industrial and business parks, and Metropolitan Redevelopment Areas where change is encouraged.

Policy 5.7.2 - Regulatory Alignment: Update regulatory frameworks to support desired growth, high quality development, economic development, housing, a variety of transportation modes, and quality of life priorities.

Policy 6.1.2 Transit-Oriented Development: Prioritize transit-supportive density, uses, and building design along Transit Corridors.

Policy 6.1.3 Auto Demand: Reduce the need for automobile travel by increasing mixed-use development, infill development within Centers, and travel demand management (TDM) programs.

Policy 9.1.1.i Housing Options: Provide for the development of multi-family housing close to public services, transit, and shopping.

Policy 9.1.2.d Affordability: Encourage the development of higher-density affordable and mixed-income housing in Downtown, near job centers, and along transit corridors.

Policy 9.3.1 Centers and Corridors: Encourage higher density, multi-unit housing and mixed-use development in Downtown, Urban, Activity, and Village Centers, and along Premium and Major Transit Corridors to capture growth, relieve development pressure at the edge of the urban footprint, and maintain low densities in rural areas.

The proposed amendment does not differentiate between Centers and Corridors and other areas. It would incentivize adding multi-family dwellings throughout Albuquerque in R-ML, R-MH, and Mixed-use zone districts. As noted above, this undermines the spirit and intent of the Comprehensive Plan, which adopts the Centers and Corridors approach as the community vision and land use/development strategy. It also further challenges the provision of services to new residents for transit and public facilities, which are planned for and organized based on the Centers and Corridors pattern of growth and development.

The proposed amendment would replace existing incentives in the IDO for reduced parking in Centers and Corridors, near transit, and for projects that include public parking.

In order to keep these incentives that benefit the city and its residents, Staff recommends denying the request for this change.

IV. PUBLIC OUTREACH

Meetings and Presentations

Council bill O-22-54 was introduced at City Council on November 7, 2022. General public comment was taken, and Council referred the bill to the EPC for review and recommendation.

The housing amendments were reviewed at an online public study session on November 18, 2022 via Zoom, in conjunction with the Annual Update. Planning staff presented the proposed amendments and then answered questions from participants. The presentations, in .pdf format and in video format, are posted on the project webpage here: <https://abc-zone.com>.

The EPC held a study session regarding the proposed 2022 IDO amendments on December 1, 2022. This was a publicly-noticed meeting. Public comment was not taken at this time.

V. NOTICE

Required Notice for the EPC Hearing

For an Amendment to IDO Text, the required notice must be published, emailed, and posted on the web. (See Table 6-1-1: Summary of Development Review Procedures.) A neighborhood meeting is not required for an Amendment to IDO Text – Citywide. The City published notice of the EPC hearing on November 21, 2022, the legal ad, in the ABQ Journal newspaper.

Email notice was sent to the two representatives of each Neighborhood Association and Coalition registered with the Office of Neighborhood Coordination pursuant to the requirements of IDO Subsection 14-16-6-4(K)(2)(a). (See attachments.) Representatives without email addresses were mailed first class letters. The neighborhood association notification letter included information about the public open house meeting held on November 18, 2022 to review the proposed amendments.

The City posted notice of the EPC hearing on the Planning Department website at this address: <http://www.cabq.gov/planning/boards-commissions/environmental-planning-commission/epc-agendas-reports-minutes>.

The City also posted notice of the application and EPC hearing on the project website at this address: <https://abc-zone.com/ido-annual-update-2022>

The City posted bill O-22-54 on Legistar as of November 4, 2022: <https://cabq.legistar.com/LegislationDetail.aspx?ID=5924773&GUID=9075460C-9E36-4425-A250-E15FA865BC1E>

VI. AGENCY & PUBLIC COMMENTS

Agency Comments

Staff received comments from the Mid-region Metropolitan Planning Organization (MRMPO) supporting the proposed amendments and sharing analysis of the potential benefits to accommodate expected growth and use existing roadways efficiently by incentivizing infill (see attachment).

Staff received comments from the Public Service Company of New Mexico (PNM) reporting that infill development can be accommodated with the existing electric grid, although additional load demands may require upgraded equipment.

Public and Neighborhood Comments

Staff has received approximately 70 written comments regarding the proposed text amendments from interested parties that include neighborhood organizations, individuals, and other organizations. Some comments include other cases on the EPC agenda for December 8 that would also amend the IDO, which are analyzed in the relevant staff reports for those cases.

Neighborhood organizations that commented include, but are not limited to, Inez NA, Los Griegos NA, Near North Valley NA, Parkland Hills NA, Santa Fe Village Neighborhood Association (NA), Spruce Park NA, the Victory Hills NA, the District 6 Coalition of NAs, and the Inter-Coalition Council of Neighborhood Associations.

Most organizations that commented provided feedback on several proposed text amendments; others offered more specific comments and focused on a few. Some comments include suggested changes to the proposed text amendments. Several comments express concern about the IDO update process and state that their organizations would have liked more time to better understand the proposed amendments.

In general, most neighborhood groups opposed the proposed amendments regarding accessory dwelling units (ADUs) and two-family detached dwellings (duplexes) in the R-1 zone, while many individuals and members of the development community supported them. Most individuals and members of the development community supported the other proposed amendments for non-residential conversions, eliminating building heights, and lower or eliminating parking requirements for multi-family development.

Comments by Topic

Section 1: Allowing Two-Family Dwellings (Duplexes) in the R-1 Zone District

Most commenters did not address this proposed amendment specifically but rather either supported additional density or opposed additional density in R-1. Comments were evenly split. Those who supported additional density, primarily individuals and members of the development community, cited the benefits of increasing housing options; supporting multi-generational

families, extended families, and low-income families; and improving walkability, biking, and transit service. Those who opposed additional density, primarily neighborhood association representatives, cited increased market pressure to turn houses into income properties, dismay over a change to zoning allowances in general, and concern over changing the character of single-family neighborhoods.

Section 2: Allow Accessory Dwelling Units (ADUs) in R-1

This proposed amendment received the vast majority of comments. Comments were evenly split. In addition to the general comments for or against additional density in R-1 as described above, the comments in support of ADUs in particular were individuals who would like to be able to add an ADU on their properties to support family members. Some commenters said they would only support ADUs for family members but not for short-term rental. Supporters cited other cities who added ADUs to address housing shortages in a way that was appropriate in neighborhoods. Comments in opposition to ADUs expressed concerns about ADUs fitting on the property, adding traffic and parking to streets and additional stress on existing, aging infrastructure, bringing strangers into neighbors' back yards.

Section 3: Kitchen Exemption for Conversions from Non-residential Development to Multi-family

The majority of comments were in support. Most commenters did not address the proposed amendment in detail but rather referred to it as part of package of amendments in O-22-54.

Section 4: Eliminating Building Height Maximums for Multi-family and Mixed-use Development in Mixed-use Zone Districts

The majority of comments were in support. Most comments in support did not address the proposed amendment in detail but rather referred to it as part of package of amendments in O-22-54. Several comments in opposition specifically opposed the change citing concerns about allowing development at a vastly different scale close to neighborhoods.

Section 5: Exempting Affordable Housing from Off-Street Parking Requirements

This proposed amendment received the fewest comments. The majority were in support. As noted above, most commenters did not address the proposed amendment specifically but rather referred to it as part of package of amendments in O-22-54.

Section 6: Reducing Parking Requirements for Multi-Family Dwellings

Most comments in support did not address the proposed amendment in detail but rather referred to it as part of package of amendments in O-22-54. Several comments in opposition specifically opposed the change citing concerns about spillover parking in neighborhoods.

VII. CONCLUSION

The request is for Amendments to IDO Text – Citywide. Council bill O-22-54 proposes six (6) changes related to housing intended to increase housing options, increase housing supply, and thereby reduce rents and home prices. The Planning Department has analyzed them for the EPC's review and recommendation to the City Council.

The request meets the review and decision criteria for citywide text amendments in IDO Subsection 14-16-6-7(D)(3). The proposed changes are generally consistent with a preponderance of applicable Comprehensive Plan goals and policies from Chapter 5 Land Use and Chapter 9 Housing.

Planning Staff held online public study sessions on the proposed changes. The video of the presentation was posted on the project webpage. The request was announced in the Albuquerque Journal, on the ABC-Z project webpage, and by e-mail to a distribution list of over 10,000 addresses. The Planning Department provided notice to neighborhood representatives via e-mail as required and sent mail for those without an e-mail address on file.

Interested parties including various neighborhood groups, individuals, and organizations provided comments that cover a variety of topics. Topics generating the most interest and/or concern allowing duplexes and accessory dwelling units in the R-1 zone district. Some neighborhood organizations expressed concern about the process, and requested answers to questions about some of the proposed text amendments.

As of this writing, Staff has received many comments from the public. Some include suggested revisions. Staff recommends a continuance for one month to the regular EPC hearing on January 19, 2023, but will be prepared should the EPC choose to make its recommendation at the December 8, 2022 special hearing.

RECOMMENDED FINDINGS – RZ-2021-00059, December 08, 2022

1. The request is for various citywide, legislative amendments to the text of the Integrated Development Ordinance (IDO) in conjunction with the 2022 Annual Update required by IDO Subsection 14-16-6-3(D).
 2. Council bill O-22-54 proposes six (6) amendments to language in the IDO related to housing. The proposed changes are intended to increase housing supply and thereby decrease rents, while balancing these needs with the Comprehensive Plan vision of protecting and enhancing existing neighborhoods.
 3. Interested parties including various neighborhood groups, individuals, and organizations provided comments that cover a variety of topics. Topics generating the most interest and/or concern allowing duplexes and accessory dwelling units in the R-1 zone district. Some neighborhood organizations expressed concern about the process, and requested answers to questions about some of the proposed text amendments.
 4. As of this writing, Staff has received many comments from the public. Some include suggested revisions. Staff recommends a continuance for one month to the regular EPC hearing on January 19, 2023.
-



Mikaela Renz-Whitmore, AICP
UDD Division Manager



Michael Vos, AICP
Principal Planner

Notice of Decision cc list:

List will be finalized subsequent to the EPC hearing on December 08, 2022.

CITY OF ALBUQUERQUE AGENCY COMMENTS

PLANNING DEPARTMENT

Zoning Enforcement

Long Range Planning

CITY ENGINEER

Transportation Development

No comments.

Hydrology Development

New Mexico Department of Transportation (NMDOT)

DEPARTMENT of MUNICIPAL DEVELOPMENT

Transportation Planning

Traffic Engineering Operations (Department of Municipal Development)

Street Maintenance (Department of Municipal Development)

RECOMMENDED CONDITIONS FROM THE CITY ENGINEER: none

WATER UTILITY AUTHORITY

Utility Services

ENVIRONMENTAL HEALTH DEPARTMENT

Air Quality Division

Environmental Services Division

PARKS AND RECREATION

Planning and Design

Open Space Division

City Forester

POLICE DEPARTMENT/Planning

SOLID WASTE MANAGEMENT DEPARTMENT

Refuse Division- no comments at this time.

FIRE DEPARTMENT/Planning

TRANSIT DEPARTMENT

COMMENTS FROM OTHER AGENCIES

BERNALILLO COUNTY

ALBUQUERQUE METROPOLITAN ARROYO FLOOD CONTROL AUTHORITY

No adverse comments.

ALBUQUERQUE PUBLIC SCHOOLS

No comment.

MID-REGION COUNCIL OF GOVERNMENTS

See attached letter.

MIDDLE RIO GRANDE CONSERVANCY DISTRICT

PUBLIC SERVICE COMPANY OF NEW MEXICO

The PNM electric grid can support infill development and redevelopment that utilizes existing electric infrastructure. But the resulting increased electric load demands may require the installation of upgraded equipment (transformers, switches, etc.), enhanced easements, and/or upgraded power lines that can safely accommodate the resulting load growth.

Increased electric load demands related to infill development and redevelopment will need corresponding adjustments and changes to processes and standards in the *Facility Plan: Electric System Transmission and Generation* to allow for greater flexibility and responsiveness in order to help advance the proposed housing opportunities.

APPLICATION INFORMATION



Please check the appropriate box and refer to supplemental forms for submittal requirements. All fees must be paid at the time of application.

Administrative Decisions	Decisions Requiring a Public Meeting or Hearing	Policy Decisions
<input type="checkbox"/> Archaeological Certificate (Form P3)	<input type="checkbox"/> Site Plan – EPC including any Variances – EPC (Form P1)	<input type="checkbox"/> Adoption or Amendment of Comprehensive Plan or Facility Plan (Form Z)
<input type="checkbox"/> Historic Certificate of Appropriateness – Minor (Form L)	<input type="checkbox"/> Master Development Plan (Form P1)	<input type="checkbox"/> Adoption or Amendment of Historic Designation (Form L)
<input type="checkbox"/> Alternative Signage Plan (Form P3)	<input type="checkbox"/> Historic Certificate of Appropriateness – Major (Form L)	<input checked="" type="checkbox"/> Amendment of IDO Text (Form Z)
<input type="checkbox"/> Minor Amendment to Site Plan (Form P3)	<input type="checkbox"/> Demolition Outside of HPO (Form L)	<input type="checkbox"/> Annexation of Land (Form Z)
<input type="checkbox"/> WTF Approval (Form W1)	<input type="checkbox"/> Historic Design Standards and Guidelines (Form L)	<input type="checkbox"/> Amendment to Zoning Map – EPC (Form Z)
	<input type="checkbox"/> Wireless Telecommunications Facility Waiver (Form W2)	<input type="checkbox"/> Amendment to Zoning Map – Council (Form Z)
		Appeals
		<input type="checkbox"/> Decision by EPC, LC, ZHE, or City Staff (Form A)

APPLICATION INFORMATION

Applicant: City of Albuquerque, Planning Department / Urban Design & Development		Phone: 505-924-3860
Address: 600 2nd Street NW, 3rd Floor		Email: abcto@cabq.gov
City: Albuquerque	State: NM	Zip: 87102
Professional/Agent (if any): Mikaela Renz-Whitmore		Phone: 505-924-3932
Address: Same		Email: same
City: Same	State: Same	Zip: Same
Proprietary Interest in Site: None		List all owners:

BRIEF DESCRIPTION OF REQUEST

Amendment to IDO Text - Citywide for Mayor's Housing Forward Plan, associated with IDO 2022 Annual Update

SITE INFORMATION (Accuracy of the existing legal description is crucial! Attach a separate sheet if necessary.)

Lot or Tract No.: Citywide	Block:	Unit:
Subdivision/Addition:	MRGCD Map No.:	UPC Code:
Zone Atlas Page(s):	Existing Zoning:	Proposed Zoning:
# of Existing Lots:	# of Proposed Lots:	Total Area of Site (acres):

LOCATION OF PROPERTY BY STREETS

Site Address/Street: Citywide	Between:	and:
-------------------------------	----------	------

CASE HISTORY (List any current or prior project and case number(s) that may be relevant to your request.)

PR-2018-001843 / RZ-2021-0048 (2021), RZ-202-0046 (2020), RZ-2019-0046 (2019); Project 1001620 Case #16EPC-50082 (adoption of the IDO), RZ-2022-00043 (SOS removal)

Signature:	Date: November 8, 2022
Printed Name: Mikaela Renz-Whitmore, AICP	<input type="checkbox"/> Applicant or <input checked="" type="checkbox"/> Agent

FOR OFFICIAL USE ONLY

Case Numbers	Action	Fees	Case Numbers	Action	Fees

Meeting/Hearing Date:	Fee Total:
Staff Signature:	Date: Project #

Form Z: Policy Decisions

Please refer to the EPC hearing schedule for public hearing dates and deadlines. Your attendance is required.

A single PDF file of the complete application including all plans and documents being submitted must be emailed to PLNDRS@cabq.gov prior to making a submittal. Zipped files or those over 9 MB cannot be delivered via email, in which case the PDF must be provided on a CD.

☒ **INFORMATION REQUIRED FOR ALL POLICY DECISIONS (Except where noted)**

- ☒ Interpreter Needed for Hearing? No ☐ if yes, indicate language: _____
- ☐ Proof of Pre-Application Meeting with City staff per IDO Section 14-16-6-4(B)
- ☐ Letter of authorization from the property owner if application is submitted by an agent
- ☐ Traffic Impact Study (TIS) form (not required for Amendment to IDO Text)
- ☐ Zone Atlas map with the entire site/plan amendment area clearly outlined and labeled (not required for Amendment to IDO Text) NOTE: For Annexation of Land, the Zone Atlas must show that the site is contiguous to City limits.

☐ **ADOPTION OR AMENDMENT OF COMPREHENSIVE PLAN**

☐ **ADOPTION OR AMENDMENT OF FACILITY PLAN**

- ☐ Plan, or part of plan, to be amended with changes noted and marked
- ☐ Letter describing, explaining, and justifying the request per the criteria in IDO Sections 14-16-6-7(A)(3) or 14-16-6-7(B)(3), as applicable
- ☐ Required notices with content per IDO Section 14-16-6-4(K)(6)
- ☐ Office of Neighborhood Coordination notice inquiry response, notifying letter, and proof of first class mailing
- ☐ Proof of emailed notice to affected Neighborhood Association representatives
- ☐ Buffer map and list of property owners within 100 feet (excluding public rights-of-way), notifying letter, and proof of first class mailing

☒ **AMENDMENT TO IDO TEXT**

- ☒ Section(s) of the Integrated Development Ordinance to be amended with changes noted and marked [See O-22-54]
- ☒ Justification letter describing, explaining, and justifying the request per the criteria in IDO Section 14-16-6-7(D)(3) [See O-22-54]
- ☒ Required notices with content per IDO Section 14-16-6-4(K)(6)
- ☒ Office of Neighborhood Coordination notice inquiry response, notifying letter, and proof of first class mailing [See email]
- ☐ Buffer map and list of property owners within 100 feet (excluding public rights-of-way), notifying letter, and proof of first class mailing [Not required for Amendment to IDO Text - Citywide]

☐ **ZONING MAP AMENDMENT – EPC**

☐ **ZONING MAP AMENDMENT – COUNCIL**

- ☐ Proof of Neighborhood Meeting per IDO Section 14-16-6-4(C)
- ☐ Letter describing, explaining, and justifying the request per the criteria in IDO Section 14-16-6-7(F)(3) or Section 14-16-6-7(G)(3), as applicable
- ☐ Required notices with content per IDO Section 14-16-6-4(K)(6)
- ☐ Office of Neighborhood Coordination notice inquiry response, notifying letter, and proof of first class mailing
- ☐ Proof of emailed notice to affected Neighborhood Association representatives
- ☐ Buffer map and list of property owners within 100 feet (excluding public rights-of-way), notifying letter, and proof of first class mailing
- ☐ Sign Posting Agreement

☐ **ANNEXATION OF LAND**

- ☐ Application for Zoning Map Amendment *Establishment of zoning must be applied for simultaneously with Annexation of Land.*
- ☐ Petition for Annexation Form and necessary attachments
- ☐ Letter describing, explaining, and justifying the request per the criteria in IDO Section 14-16-6-7(E)(3)
- ☐ Board of County Commissioners (BCC) Notice of Decision

I, the applicant or agent, acknowledge that if any required information is not submitted with this application, the application will not be scheduled for a public meeting or hearing, if required, or otherwise processed until it is complete.

Signature:



Date: November 8, 2022

Printed Name: Mikaela Renz-Whitmore, AICP

☒ Applicant or ☐ Agent

FOR OFFICIAL USE ONLY

Project Number:

Case Numbers

-

-

-

Staff Signature:

Date:



COUNCIL BILL O-22-54



CITY OF ALBUQUERQUE CITY COUNCIL

INTEROFFICE MEMORANDUM

TO: Alan Varela, Director – Planning Department

FROM: Chris Melendrez, Director – Council Services

A handwritten signature in black ink, appearing to read "Chris Melendrez".

SUBJECT: Bill No. O-22-54 - Adopting Citywide Text Amendments To The Integrated Development Ordinance §14-16 In Conjunction With The 2022 IDO Annual Update Process To Address The Need For More Housing Opportunities (Benton and Jones, by request)

DATE: November 8th, 2022

The attached ordinance was introduced by the City Council on November 7th, 2022. The intent of this ordinance is to propose amendments to regulations within the Integrated Development Ordinance related to housing development. This ordinance was sponsored by request of the Administration.

I understand that the sponsors intend for this matter be considered contemporaneously with the 2022 IDO Annual Update which is slated to make its first appearance at Environmental Planning Commission (EPC) on December 8th, 2022. For this reason, we request that you submit this ordinance to the EPC for a hearing at its December 8th meeting.

After the EPC has concluded their review, please submit the EPC comments and recommendations, including the transcripts from the meeting, back to the City Council as soon as possible.

cc: James Aranda, Deputy Director / ZEO
Mikaela Renz-Whitmore, Planning Manager, Urban Design + Development Division
Catalina Lehner, Principal Planner

CITY of ALBUQUERQUE

TWENTY FIFTH COUNCIL

COUNCIL BILL NO. O-22-54 ENACTMENT NO. _____

SPONSORED BY: Isaac Benton and Trudy Jones, by request

1 **ORDINANCE**

2 **ADOPTING CITYWIDE TEXT AMENDMENTS TO THE INTEGRATED**
3 **DEVELOPMENT ORDINANCE §14-16 IN CONJUNCTION WITH THE 2022 IDO**
4 **ANNUAL UPDATE PROCESS TO ADDRESS THE NEED FOR MORE HOUSING**
5 **OPPORTUNITIES.**

6 **WHEREAS, the City Council, the Governing Body of the City of**
7 **Albuquerque, has the authority to adopt and amend plans for the physical**
8 **development of areas within the planning, platting, and zoning jurisdiction of**
9 **the City authorized by statute, Sections 3-19-5 and 3-21-1, NMSA 1978, and by**
10 **its home rule powers; and**

11 **WHEREAS, the City's zoning powers are established by the City charter, in**
12 **which: Article I, Incorporation and Powers, allows the City to adopt new**
13 **regulatory structures and processes to implement the Albuquerque-Bernalillo**
14 **County Comprehensive Plan ("Comp Plan") and help guide future legislation;**
15 **Article IX, Environmental Protection, empowers the City to adopt regulations**
16 **and procedures to protect and preserve environmental features such as water,**
17 **air and other natural endowments, ensure the proper use and development of**
18 **land, and promote and maintain an aesthetic and humane urban environment;**
19 **and Article XVII, Planning, establishes the City Council as the City's ultimate**
20 **planning and zoning authority; and**

21 **WHEREAS, the City Council adopted an updated Albuquerque-Bernalillo**
22 **County Comprehensive Plan ("ABC Comp Plan") in 2017 via R-16-108**
23 **(Enactment No. R-2017-026); and**

24 **WHEREAS, the 2017 ABC Comp Plan adopted housing goals and policies,**
25 **including Goal 9.1 Supply; Policy 9.1.1 Housing Options, including Sub-**
26 **policies 9.1.1.a, 9.1.1.b, 9.1.1.c, 9.1.1.h, and 9.1.1.i to encourage housing**

[Bracketed/Underscored Material] - New
[Bracketed/Strikethrough Material] - Deletion

1 options for all types of households at all income levels, discourage
2 discrimination and segregation by race or class, and provide for multi-family
3 housing close to investments in public services, transit, and shopping; and
4 Policy 9.1.2 Affordability, including Sub-policies 9.1.2.a, 9.1.2.b, 9.1.2.c, 9.1.2.d,
5 and 9.1.2.e to prioritize affordable housing for populations with the lowest
6 income levels; encourage a diversity of housing types, including townhouses
7 and accessory dwelling units that are at a similar scale to existing
8 neighborhoods; encourage higher-density housing near job centers and along
9 transit corridors; and encourage mixed-use development; and
10 WHEREAS, the City Council adopted the Integrated Development
11 Ordinance (IDO) to implement Comp Plan Goals and policies; and
12 WHEREAS, the IDO establishes zone districts, allowable uses, use-specific
13 standards, and general regulations in Parts 1 through 5 that set the bar for
14 high-quality development that is compatible with surrounding land uses and
15 provides appropriate transitions and buffers to lower-intensity uses nearby;
16 procedures for review and decision of applications related to land use and
17 development in Part 6; and definitions and acronyms in Part 7; and
18 WHEREAS, any amendment of the IDO text that applies citywide is to be
19 reviewed and decided as a legislative action; and
20 WHEREAS, the City has the responsibility to establish land use and zoning
21 regulations that respond to changes in the supply and demand for housing;
22 and
23 WHEREAS, the Department of Family and Community Services'
24 Consolidated Housing Plan for 2018-2022 calculated the city's Area Median
25 Income (AMI) to be \$47,989, with over 20 percent of the city's 222,491
26 households making less than 50 percent of that AMI and 11 percent of
27 households at or below 30 percent of that AMI; and
28 WHEREAS, the City's point-in-time count identified over 1300 people
29 experiencing homelessness in 2022; and
30 WHEREAS, an Urban Institute study found that over 15,000 affordable
31 housing units were needed for households at or below 30 percent of Area
32 Median Income (AMI); and

1 WHEREAS, the Harvard Joint Center for Housing Studies reported that
2 Albuquerque rents increased nearly 20 percent year-over-year in 2021
3 compared to 2.6 percent in 2015; and

4 WHEREAS, rents in the city have increased more than 11 percent in the last
5 year alone, according to ApartmentList.com, and the vacancy rate for multi-
6 family development fell below 3 percent for the Albuquerque market in the first
7 quarter of 2022, according to Northmarq Real Estate Investment/REIS; and

8 WHEREAS, this upward shift in prices disproportionately impacts lower
9 income households, because the supply of rental units affordable to
10 households with incomes of less than \$25,000 per year decreased by over 50
11 percent between 2010 and 2019 compared to a 9 percent decrease in the
12 number of renters with incomes less than \$25,000 statewide, according to the
13 Mortgage Finance Authority's New Mexico Housing Strategy from September
14 2022; and

15 WHEREAS, typical Albuquerque home value increased nearly 20 percent in
16 2021 compared to just 0.2 percent in 2015, according to data from the Harvard
17 Joint Center for Housing Studies; and

18 WHEREAS, housing prices have increased more than 17 percent in the first
19 quarter of 2022, according to data from the Harvard Joint Center for Housing
20 Studies; and

21 WHEREAS, over 5,000 housing units of all types need to be added every
22 year statewide, on average, to accommodate growth expected by 2025, while
23 over the past 10 years, only 3,300 housing units were constructed, on average,
24 and the trend of more households moving to urban areas continues,
25 according to the Mortgage Finance Authority's New Mexico Housing Strategy
26 from September 2022; and

27 WHEREAS, recent commitments from Amazon, Netflix, Facebook, and Intel
28 for expansions are estimated to bring over 40,000 new jobs and households to
29 the region, necessitating over 14,000 new rental units and 26,000 single-family
30 dwellings, according to ULI and the Ventana Fund; and

31 WHEREAS, increasing the supply of all types of housing generally keeps
32 housing prices and rents more affordable; and

1 WHEREAS, only 36 percent of the total area of the city has Residential or
2 Mixed-use zoning that allows residential development; and

3 WHEREAS, the R-1 zone district makes up 23 percent of the total
4 geographic area of the city; and

5 WHEREAS, the R-1 zone district only allows one single-family dwelling per
6 lot; and

7 WHEREAS, there are 135,894 properties zoned R-1, which accounts for 68
8 percent of all zoned properties in the city; and

9 WHEREAS, the history of R-1 zoning includes efforts to exclude people
10 outside the dominant race and lower-income households; and

11 WHEREAS, low-density residential development includes many housing
12 options that can meet the needs of seniors to age in place; multi-generational
13 households to provide spaces for college students, aging parents, and
14 extended family members; and households that would benefit from additional
15 rental income from dwelling units on their properties; and

16 WHEREAS, adding an additional dwelling unit for rental or for family
17 members either as an accessory dwelling unit on a lot with an existing house
18 or renovating an existing house into a two-family dwelling can be an anti-
19 displacement strategy to help families stay in their homes, support extended
20 families and multigenerational households, and build generational wealth
21 through homeownership for many families who have been marginalized
22 historically; and

23 WHEREAS, most of the regulatory protections for neighborhoods and
24 Areas of Consistency in the IDO are tied to low-density residential
25 development; and

26 WHEREAS, allowing two-family dwellings (duplexes) and accessory
27 dwelling units in the R-1 zone district would immediately remove exclusionary
28 effects, allow triple the number of dwellings on 68 percent of the city's zoned
29 properties (38% of the city's total land area), and maintain the existing
30 protections for neighborhoods and Areas of Consistency; and

31 WHEREAS, only 9 percent of the city's total land area is zoned R-MH or one
32 of the Mixed-use zone districts, which allow multi-family at the highest
33 densities through higher maximum building height; and

1 WHEREAS, maximum building heights and required off-street parking can
2 be regulatory barriers to development projects that could increase the
3 availability of multi-family dwellings; and

4 WHEREAS, removing limits on building heights and reducing off-street
5 parking requirements for multi-family dwellings would be an incentive that
6 could lower the construction cost per dwelling unit, help projects be more
7 feasible, and increase the supply of multi-family dwellings; and

8 WHEREAS, affordable housing is often the most feasible when provided as
9 multi-family dwellings; and

10 WHEREAS, exempting affordable housing provided as multi-family
11 dwellings from the off-street parking requirement would be an incentive that
12 could reduce development costs, help projects be more feasible, and increase
13 the supply of affordable multi-family dwelling units.

14 BE IT ORDAINED BY THE COUNCIL, THE GOVERNING BODY OF THE CITY OF
15 ALBUQUERQUE:

16 SECTION 1. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO
17 ALLOW TWO-FAMILY DWELLINGS PERMISSIVELY IN THE R-1 ZONE
18 DISTRICT CITYWIDE.

19 (A) Revise §14-16-2-3(B)(1) Purpose as follows:

20 “The purpose of the R-1 zone district is to provide for neighborhoods of
21 single-family and two-family homes on lots with a variety of lot sizes and
22 dimensions, with limited civic and institutional uses to serve the surrounding
23 residential area. When applied in developed areas, an additional purpose is to
24 require that redevelopment reinforce the established character of the existing
25 neighborhood. ~~Primary land uses include single-family detached homes on~~
26 ~~individual lots, with limited civic and institutional uses to serve the~~
27 ~~surrounding residential area~~. Allowable uses are shown in Table 4-2-1.”

28 (B) Delete §14-16-4-3(B)(5)(b) and the illustration to allow two-family
29 detached dwellings in all R-1 subzones.

30 SECTION 2. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO
31 ALLOW DETACHED ACCESSORY DWELLING UNITS WITH KITCHENS
32 PERMISSIVELY IN THE R-1 ZONE DISTRICT CITYWIDE, EXCEPT IN SMALL
33 AREAS WHERE SPECIAL REGULATIONS APPLY.

1 (A) Revise Table 4-2-1 to remove “A” from Dwelling Unit, Accessory without
2 Kitchen in the following zone districts: R-MH, MX-L, MX-M, NR-C, NR-BP,
3 NR-LM, NR-GM, and NR-PO-B.

4 (B) Revise Table 4-2-1 to remove “A” from Dwelling Unit, Accessory with
5 Kitchen for the R-MH zone district.

6 (C) Revise §14-16-4-3(F)(5)(a) as follows:

7 "Where this use is allowed, only 1 accessory dwelling unit is
8 allowed per lot and shall be limited to 750 square feet of gross floor
9 area. A garage attached to the accessory dwelling unit shall not count
10 toward this size limit. See Table 4-2-1 for the zone districts where this
11 use is allowed and Subsection 14-16-4-3(F)(5)(e) for the small areas
12 where accessory dwelling units with kitchens are only allowed
13 conditionally in the R-1 zone district or have special regulations.

14 1. Where added as accessory to a single-family or two-family detached
15 dwelling, this use must be provided as an accessory building and may
16 be provided without a kitchen.

17 a. A renovation to create a second unit with a kitchen, a separate
18 entrance, and no shared spaces in a single-family dwelling is
19 regulated separately as a two-family detached dwelling in Table 4-2-

20 1.

21 b. A second kitchen within a single-family or two-family detached
22 dwelling is regulated separately as an allowable accessory use in
23 Table 4-2-1.

24 ~~1. If accessory to residential development in any zone district,~~
25 ~~the accessory dwelling unit can be attached or detached.~~

26 2. In a Mixed-use or Non-residential zone district, an accessory dwelling
27 unit may be added for the caretaker of a primary non-residential use,
28 either attached or detached to the building with a primary use, and must
29 include a kitchen."

30 ~~2. If accessory to a non-residential use in any Mixed-use zone~~
31 ~~district, the accessory dwelling unit shall be attached to the~~
32 ~~building with the non-residential use.~~

33 ~~3. In a Non-residential zone district, the accessory dwelling unit~~

1 is ~~allowed for the caretaker of the primary non-residential use~~
2 and may be attached or detached.

3 (D) Delete §14-16-4-3(F)(5)(b) and renumber subsequent subsections
4 accordingly.

5 ~~"When an accessory dwelling unit is attached to a primary dwelling,~~
6 ~~only 1 dwelling unit entrance may face the front lot line."~~

7 (E) Revise §14-16-4-3(F)(5)(e) as follows:

8 "Accessory dwelling units with or without a kitchen are allowed as a
9 permissive accessory use ~~prohibited~~ in the R-1 zone district, with
10 exceptions where they are allowed as ~~permissive or~~ conditional
11 accessory uses in ~~certain Center and Corridor areas and in certain small~~
12 ~~areas as specified below and as allowed pursuant to Subsection (f)~~
13 ~~below. Where allowed as a conditional accessory use, a Conditional Use~~
14 ~~Approval pursuant to Subsection 14-16-6-6(A) is required."~~

15 (F) Delete §14-16-4-3(F)(5)(e)1 and renumber subsequent subsections
16 accordingly.

17 ~~"Near Premium Transit and Main Street Areas~~

18 ~~Accessory dwelling units with a kitchen are a permissive~~
19 ~~accessory use within 1,320 feet (¼ mile) of PT and MS areas.~~

20 ~~An accessory dwelling unit shall not exceed 750 square feet of~~
21 ~~gross floor area."~~

22 (G) Revise §14-16-4-3(F)(5)(g) as follows:

23 "In the small areas in Subsection (e) above that require a Conditional
24 Use Approval pursuant to Subsection 14-16-6-6(A) for accessory
25 dwelling units with kitchens ~~R-1 zone district~~, accessory dwelling units
26 without kitchens require a Conditional Use Approval pursuant to
27 Subsection 14-16-6-6(A), ~~except in areas where accessory dwelling units~~
28 ~~with kitchens are allowed permissively pursuant to Subsection (e)~~
29 ~~above."~~

30 (H) Revise the definition of Dwelling Unit, Accessory in §14-16-7-1 as
31 follows:

32 "A dwelling unit that is accessory to a primary single-family or two-
33 family detached dwelling or a non-residential primary use. Accessory

dwelling units may be attached to the primary dwelling, contained within the primary dwelling, or built as a detached building. This IDO distinguishes between accessory dwelling units with and without a kitchen. A detached accessory dwelling unit is also considered an accessory building. See also Dwelling Definitions for Dwelling, Live/Work; Dwelling, Single-family Detached; and Dwelling, Two-family Detached (Duplex); Kitchen; and Measurement Definitions for Accessory Dwelling Unit.

SECTION 3. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO EXEMPT ALL CONVERSIONS FROM NON-RESIDENTIAL DEVELOPMENT TO MULTI-FAMILY DWELLINGS FROM THE DEFINITION OF KITCHEN. Amend existing text in the use-specific standard in §14-16-4-3(B)(8)(e) as follows:

~~“4-3(B)(8)(e) In Mixed-use zone districts, [a maximum of 100 dwelling units resulting from] a conversion of existing non-residential development to a residential use shall be exempt from the definition of kitchen in IDO Section 14-16-7-1 [in multi-family residential dwellings that receive funding through the City of Albuquerque Department of Family and Community Services as affordable housing as defined by Article 14-21 of ROA 1994 (Affordable Housing Implementation Ordinance),]~~ if all of the following requirements are met.

1. A separate kitchen and bathroom shall be provided in each dwelling unit.
2. The kitchen shall include all of the following requirements:
 - a. A sink of adequate size and shape for washing dishes and food items (as opposed to washing hands).
 - b. A refrigerator that inclu[d]es a separate freezer compartment.
 - c. A countertop surface, an appliance for warming food (such as microwave or hotplate), and an electrical outlet that allows the appliance to be plugged in safely.
- ~~3. An accessory or primary use for office or personal services shall be provided on the same premises for service coordination.~~
- ~~4. An agreement shall be provided with application materials to prove that a minimum of 40 hours of support services a week will be provided to residents.]~~

5. Units shall have a maximum of 2 bedrooms, and occupancy shall be limited as follows:

- a. 2 people per efficiency unit.
- b. 2 people per 1-bedroom unit.
- c. 4 people per 2-bedroom unit.”

SECTION 4. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO ELIMINATE BUILDING HEIGHT MAXIMUMS FOR MULTI-FAMILY RESIDENTIAL DEVELOPMENT AND MIXED-USE DEVELOPMENT.

A. Revise Table 5-1-1 by replacing the Workforce Housing Bonus in the R-MH zone district with the following text:

“No maximum building height for multi-family residential development”

B. Revise Table 5-1-2 by replacing the Workforce Housing Bonus in Mixed-use zone districts with the following text:

“No maximum building height for multi-family residential development or mixed-use development”

SECTION 5. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO EXEMPT AFFORDABLE HOUSING FROM OFF-STREET PARKING REQUIREMENTS. Add a new §14-16-5-5(B)(2)(a)1, renumbering subsequent subsections accordingly, with text as follows:

“Where allowed, multi-family or mixed-use development that provides at least 20 percent of dwelling units as affordable to households at or below 50 percent of Area Median Income (AMI) as calculated by the U.S. Department of Housing and Urban Development (HUD) for the City of Albuquerque.”

SECTION 6. ADD A PARKING REDUCTION FOR MULTI-FAMILY DWELLINGS IN MIXED-USE ZONE DISTRICTS. Add a new subsection in §14-16-5-5(C)(5) with text as follows:

Reduction for Multi-family Dwellings in Mixed-use Zone Districts

The minimum number of off-street parking spaces required by Table 5-1-1 may be reduced by 75 percent if a proposed multi-family dwelling is located in any Mixed-use zone district.

SECTION 7. SEVERABILITY CLAUSE. If any section, paragraph, sentence, clause, word or phrase of this ordinance is for any reason held to be invalid or unenforceable by any court of competent jurisdiction, such decision shall not

1 affect the validity of the remaining provisions of this ordinance and each
2 section, paragraph, sentence, clause, word, or phrase thereof irrespective of
3 any provision being declared unconstitutional or otherwise invalid.

4 SECTION 8. This ordinance shall be incorporated in and made part of the
5 Revised Ordinances of Albuquerque, New Mexico, 1994.

6 SECTION 9. EFFECTIVE DATE AND PUBLICATION OF SECTIONS 1
7 THROUGH 6. Sections 3 through 8 of this ordinance shall take effect after
8 publication by title and general summary upon the sooner of the effective date
9 of the 2022 IDO Annual Update or January 31st, 2024.

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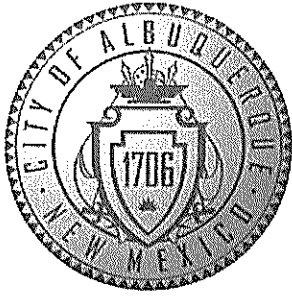
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CITY OF ALBUQUERQUE
Albuquerque, New Mexico
Office of the Mayor

Mayor Timothy M. Keller

INTER-OFFICE MEMORANDUM

October 28, 2022

TO: Isaac Benton, President, City Council

FROM: Timothy M. Keller, Mayor 

SUBJECT: Housing Text Amendments to the Integrated Development Ordinance (IDO) to be included in the 2022 Annual Update

The attached, recommended legislation would enact emergency text amendments to the Integrated Development Ordinance (IDO) to rapidly address the City's worsening housing shortage. These emergency amendments would apply city-wide as part of the 2022 Annual Update.

BACKGROUND

The City is experiencing a rapidly worsening housing shortage that is contributing to increased homelessness, record high rents and inflationary housing prices. In addition, the shortage is causing an alarming and growing gap between the shrinking affordable housing supply and the expanding demand. In response, the Office of the Mayor convened a task force in the summer of 2022 to create a Strategic Housing Initiative. The attached emergency legislation is a key piece of that initiative.

REQUEST

The proposed city-wide emergency text amendments include changes to the Integrated Development Ordinance (IDO) that are intended to promptly remove regulatory barriers to increasing the supply of market rate and affordable housing in Albuquerque.

The proposed changes are intended to be transformative, which is fitting for the crisis facing our local government, thousands of families in our community, and our housing partners. The Administration is sending these changes for legislative action ahead of the IDO Annual Update due to the severity and urgency of the present housing crisis.

CONCLUSION

The Administration is forwarding proposed legislation for City Council to adopt as part of the IDO Annual Update for 2022.

Title/ Subject of Legislation: Housing Text Amendments to the Integrated Development Ordinance (IDO) to be included in the 2022 Annual IDO Update.

Approved:

Lawrence Rael Date _____
Chief Administrative Officer

Date _____

Approved as to Legal Form:

DocuSigned by:

lauren keefe

10/31/2022 | 1:56 PM MDT

1A21D96D32C74EE

Lauren Keefe
City Attorney

Date _____

Recommended:

- DocuSigned by:

Alan Varela

10/31/2022 | 11:39 AM MDT

947D8BB6EE4C443

Alan Varela
Director

Date _____

Cover Analysis

- 1. What is it?** Housing Text Amendments to the Integrated Development Ordinance (IDO) to be included in the 2022 Annual Update.
- 2. What will this piece of legislation do?** This legislation would enact text amendments to the Integrated Development Ordinance (IDO) to rapidly address the City's worsening housing shortage. These housing amendments would apply city-wide if adopted as part of the 2022 IDO Annual Update.
- 3. Why is this project needed?** The City is experiencing a rapidly worsening housing shortage that is contributing to increased homelessness, record high rents and inflationary housing prices. In addition, the shortage is causing an alarming and growing gap between the shrinking affordable housing supply and the expanding demand. These amendments are needed to promptly remove regulatory barriers to increasing the supply of market rate and affordable housing in Albuquerque.
- 4. How much will it cost and what is the funding source?** There is no cost to the City associated with this legislation.
- 5. Is there a revenue source associated with this contract? If so, what level of income is projected?** N/A
- 6. What will happen if the project is not approved?** If the amendments are not approved, the gap between the shrinking affordable housing supply and the expanding demand will not be addressed in a significant way and is likely to worsen as rent costs continue to increase.
- 7. Is this service already provided by another entity?** No.

FISCAL IMPACT ANALYSIS

TITLE: Adopting Housing Text Amendments to the IDO in the 2022 Annual Update R: O:
 FUND: 110
 DEPT: 4926000

- ☒ No measurable fiscal impact is anticipated, i.e., no impact on fund balance over and above existing appropriations.
- ☐ (If Applicable) The estimated fiscal impact (defined as impact over and above existing appropriations) of this legislation is as follows:

	2023	Fiscal Years 2024	2025	Total
Base Salary/Wages				-
Fringe Benefits at	-	-	-	-
Subtotal Personnel	-	-	-	-
Operating Expenses				-
Property			-	-
Indirect Costs	-			-
Total Expenses	\$ -	\$ -	\$ -	\$ -
<input checked="" type="checkbox"/> Estimated revenues not affected				
<input type="checkbox"/> Estimated revenue impact				
Amount of Grant	-			-
City Cash Match	-	-	-	-
City Inkind Match		-	-	-
City IDOH *15.30	-			-
Total Revenue	\$ -	\$ -	\$ -	\$ -

These estimates do not include any adjustment for inflation.

* Range if not easily quantifiable.

Number of Positions created 0

COMMENTS ON NON-MONETARY IMPACTS TO COMMUNITY/CITY GOVERNMENT:

This legislation would amend the IDO text with citywide changes related to the current housing crisis ahead of the 2022 IDO annual update. These amendments would replace the R-1 zone district with R-T zoning and associated standards, lower parking requirements for multi-family dwellings, eliminate parking requirements for affordable housing, and eliminate building height limits for multi-family dwellings.

PREPARED BY: APPROVED:

FISCAL MANAGER (date) DIRECTOR (date)

REVIEWED BY:

EXECUTIVE BUDGET ANALYST (date) BUDGET OFFICER (date) CITY ECONOMIST (date)

IDO Text Amendment 2022 - O-22-54 Table

Item #	IDO Page	IDO Section	Change / Discussion	Explanation	Source
1	15	2-3(B)(1)	R-1 Purpose Revise text as follows: "The purpose of the R-1 zone district is to provide for neighborhoods of single-family <u>and two-family homes on lots</u> with a variety of lot sizes and dimensions, <u>with limited civic and institutional uses to serve the surrounding residential area</u> . When applied in developed areas, an additional purpose is to require that redevelopment reinforce the established character of the existing neighborhood. Primary land uses include single-family detached homes on individual lots, with limited civic and institutional uses to serve the surrounding residential area. Allowable uses are shown in Table 4-2-1."	Reflects changes proposed in 14-16-4-3(B)(5)(b) to allow duplexes in all R-1 sub-zones.	O-22-54 Section 1(A)
2	149	Table 4-2-1	Accessory Uses Dwelling Unit, Accessory without Kitchen Remove "A" from R-MH, MX-L, MX-M, NR-C, NR-BP, NR-LM, NR-GM, and NR-PO-B.	Revised as a ripple of the proposed change to the definition of an Accessory Dwelling Unit (ADU) as a detached building associated with a single house or duplex, which are not allowed uses in R-MH, and required to have a kitchen if accessory to a non-residential use in the MX or NR zone districts. See associated proposed changes in Subsection 14-16-4-3(F)(5) and Section 14-16-7-1.	O-22-54 Section 2(A)
3	149	Table 4-2-1	Accessory Uses Dwelling Unit, Accessory with Kitchen Remove "A" from R-MH.	Revised as a ripple of the proposed change to the definition of an Accessory Dwelling Unit (ADU) as a detached building associated with a single house or duplex, which are not allowed uses in R-MH. In R-MH, an additional unit can be added to townhouse or multi-family without being an ADU. See associated proposed changes in Subsection 14-16-4-3(F)(5) and Section 14-16-7-1.	O-22-54 Section 2(B)
4	156	4-3(B)(5)(b)	Dwelling, Two-family Detached (Duplex) Delete text and illustration to allow two-family detached dwellings in all R-1 subzones.	Allows duplexes permissively in all R-1 subzones. Removes the requirement for duplexes to be built with each dwelling unit on a separate lot.	O-22-54 Section 1(B)

IDO Text Amendment 2022 - O-22-54 Table

Item #	IDO Page	IDO Section	Change / Discussion	Explanation	Source
5	158	4-3(B)(8)(e)	Dwelling, Multi-family - Kitchen Exemption Revise text as follows: "In Mixed-use zone districts, a maximum of 100 dwelling units resulting from a conversion of existing non-residential development to a residential use shall be exempt from the definition of kitchen in IDO Section 14-16-7-1 in multi-family dwellings that receive funding through the City of Albuquerque Department of Family and Community Services as affordable housing as defined by Article 14-21 of ROA 1994 (Affordable Housing Implementation Ordinance), if all of the following requirements are met."	Removes requirement for Family and Community Services funds for conversions from non-residential to multi-family to be exempted from the definition of kitchen. Exempts all conversions of any size from the definition of kitchen (i.e. requirement to provide a stove). See definition of kitchen in Section 14-16-7-1.	O-22-54 Section 3
6	158	4-3(B)(8)(e) (cont'd)	Dwelling, Multi-family - Kitchen Exemption Revise text as follows: "1. A separate kitchen and bathroom shall be provided in each dwelling unit. 2. The kitchen shall include all of the following requirements: a. A sink of adequate size and shape for washing dishes and food items (as opposed to washing hands). b. A refrigerator that includes a separate freezer compartment. c. A countertop surface, an appliance for warming food (such as microwave or hotplate), and an electrical outlet that allows the appliance to be plugged in safely."	Keeps minimum standards for kitchens in multi-family created through converting non-residential development. Fixes a typo in 2.a.	O-22-54 Section 3
7	158	4-3(B)(8)(e) (cont'd)	Dwelling, Multi-family - Kitchen Exemption Revise text as follows: "3. An accessory or primary use for office or personal services shall be provided on the same premises for service coordination. 4. An agreement shall be provided with application materials to prove that a minimum of 40 hours of support services a week will be provided to residents."	Removes items related to FCS funding for affordable housing.	O-22-54 Section 3

IDO Text Amendment 2022 - O-22-54 Table

Item #	IDO Page	IDO Section	Change / Discussion	Explanation	Source
8	158	4-3(B)(8)(e) (cont'd)	Dwelling, Multi-family - Kitchen Exemption Revise text as follows: "5. Units shall have a maximum of 2 bedrooms, and occupancy shall be limited as follows: a. 2 people per efficiency unit. b. 2 people per 1-bedroom unit. c. 4 people per 2-bedroom unit."	Removes items related to FCS funding for affordable housing.	O-22-54 Section 3
9	158	4-3(B)(8)(e) (cont'd)	Dwelling, Multi-family - Kitchen Exemption Revise text as follows: "5. Units shall have a maximum of 2 bedrooms, and occupancy shall be limited as follows: a. 2 people per efficiency unit. b. 2 people per 1-bedroom unit. c. 4 people per 2-bedroom unit."	Removes items related to FCS funding for affordable housing.	O-22-54 Section 3
10	205	4-3(F)(5)(a)	Dwelling Unit, Accessory (With or Without Kitchen) Revise text as follows: "Where this use is allowed, only 1 accessory dwelling unit is allowed per lot and shall be limited to 750 square feet of gross floor area. <u>A garage attached to the accessory dwelling unit shall not count toward this size limit.</u> See Table 4-2-1 for the zone districts where this use is allowed and Subsection 14-16-4-3(F)(5)(e) for the small areas where accessory dwelling units with kitchens are <u>only</u> allowed <u>conditionally</u> in the R-1 zone district <u>or have special regulations.</u> "	Allows ADUs permissively citywide in R-1 except in small areas where ADUs are conditional. Limits ADUs in size. See associated proposed changes in Subsection 14-16-4-3(F)(5) and Section 14-16-7-1.	O-22-54 Section 2(C)
11	205	4-3(F)(5)(a) (cont'd)	Dwelling Unit, Accessory (With or Without Kitchen) (cont'd) Replace existing text as follows: <u>1. Where added as accessory to a single-family or two-family detached dwelling, this use must be provided as an accessory building and may be provided without a kitchen.</u> 1. If accessory to residential development in any zone district, the accessory dwelling unit can be attached or detached.	Requires ADUs to be detached. Allows ADUs without kitchens. ¶ Adds reference to accessory building standards in Subsection 14-16-5-11(C)(4), which might also limit the size and placement of an ADU. Removes unnecessary regulation, since ADUs are proposed to be required to be detached when accessory to a dwelling.	O-22-54 Section 2(C)

IDO Text Amendment 2022 - O-22-54 Table

Item #	IDO Page	IDO Section	Change / Discussion	Explanation	Source
12	205	4-3(F)(5)(a) (cont'd)	<p>Dwelling Unit, Accessory (With or Without Kitchen) (cont'd)</p> <p><u>2. In a Mixed-use or Non-residential zone district, an accessory dwelling unit may be added for the caretaker of a primary non-residential use, either attached or detached to the building with a primary use, and must include a kitchen.</u></p> <p>2. If accessory to a non-residential use in any Mixed-use zone district, the accessory dwelling unit shall be attached to the building with the non-residential use.</p> <p>3. In a Non-residential zone district, the accessory dwelling unit is allowed for the caretaker of the primary non-residential use and may be attached or detached.</p>	Allows ADUs in MX or NR to be attached or detached but requires kitchens.	O-22-54 Section 2(C)
13	205	4-3(F)(5)(a)1	<p>Dwelling Unit, Accessory (With or Without Kitchen) (cont'd)</p> <p>Add new subsections with text as follows:</p> <p><u>a. A renovation to create a second unit with a kitchen, a separate entrance, and no shared spaces in a single-family dwelling is regulated separately as a two-family detached dwelling (duplex) in Table 4-2-1.</u></p> <p><u>b. A second kitchen within a single-family or two-family detached dwelling is regulated separately as an allowable accessory use in Table 4-2-1.</u></p>	Clarifies that attached ADUs with no shared spaces are regulated as duplexes. Clarifies that attached ADUs with shared spaces are regulated as a second kitchen in a house.	O-22-54 Section 2(C)
14	206	4-3(F)(5)(b)	<p>Dwelling Unit, Accessory (With or Without Kitchen)</p> <p>Delete this subsection and renumber subsequent subsections accordingly.</p> <p>"When an accessory dwelling unit is attached to a primary dwelling, only 1 dwelling unit entrance may face the front lot line."</p>	Eliminates the requirement that only 1 dwelling unit entrance can face the front lot line. See associated proposed change in Table 4-2-1 allowing two-family detached dwellings (duplexes) in R-1.	O-22-54 Section 2(D)

IDO Text Amendment 2022 - O-22-54 Table

Item #	IDO Page	IDO Section	Change / Discussion	Explanation	Source
15	206	4-3(F)(5)(e)	<p>Dwelling Unit, Accessory (With or Without Kitchen) Revise text as follows: "Accessory dwelling units with or without a kitchen are <u>allowed as a permissive accessory use</u> prohibited in the R-1 zone district, with exceptions where they are allowed as permissive or conditional accessory uses in certain Center and Corridor areas and in certain small areas as specified below and as allowed pursuant to Subsection (f) below. Where allowed as a conditional accessory use, a Conditional Use Approval pursuant to Subsection 14-16-6-6(A) is required." Delete subsection 1 and renumber subsequent subsections accordingly.</p>	Allows accessory dwelling units permissively in R-1 except in small areas where a Conditional Use Approval is required.	O-22-54 Section 2(E)
16	206	4-3(F)(5)(e)	<p>Dwelling Unit, Accessory (With or Without Kitchen) Delete subsection 1 and renumber subsequent subsections accordingly. "Near Premium Transit and Main Street Areas Accessory dwelling units with a kitchen are a permissive accessory use within 1,320 feet (¼ mile) of PT and MS areas. An accessory dwelling unit shall not exceed 750 square feet of gross floor area."</p>	Removes un-necessary allowance, given the proposal to make ADUs permissive citywide.	O-22-54 Section 2(F)
17	208	4-3(F)(5)(g)	<p>Dwelling Unit, Accessory (With or Without Kitchen) Revise the text as follows: <u>"In the small areas in Subsection (e) above that require a Conditional Use Approval pursuant to Subsection 14-16-6-6(A) for accessory</u> dwelling units with kitchens R-1 zone district, accessory dwelling units without kitchens require a Conditional Use Approval pursuant to Subsection 14-16-6-6(A), except in areas where accessory dwelling units with kitchens are allowed permissively pursuant to Subsection (e) above."</p>	Keeps the existing allowances for accessory dwelling units in the small areas that require Conditional Use Approval.	O-22-54 Section 2(G)
18	221	Table 5-1-1	<p>Building Height in R-MH Zone District Replace the Workforce Housing Bonus with the following text: "No maximum building height for multi-family residential development"</p>	Removes building height limits in R-MH for multi-family development. Neighborhood Edges in Subsection 14-16-5-9 would still apply to require a building height transition between Protected Lots and Regulated Lots.	O-22-54 Section 4(A)

IDO Text Amendment 2022 - O-22-54 Table

Item #	IDO Page	IDO Section	Change / Discussion	Explanation	Source
19	226	Table 5-1-2	Building Height in MX Zone Districts / Workforce Housing Bonus Replace the Workforce Housing Bonus with the following text: "No maximum building height for multi-family development or mixed-use development"	Removes building height limits in MX zones for multi-family development. Neighborhood Edges in Subsection 14-16-5-9 would still apply to require a building height transition between Protected Lots and Regulated Lots.	O-22-54 Section 4(B)
20	262	5-5(B)(2)(a)	Off-street Parking Exemption - Affordable Housing Add a new subsection (1) and renumber subsequent subsections accordingly: <u>"Where allowed, multi-family or mixed-use development that provides at least 20 percent of dwelling units as affordable to households at or below 50 percent of Area Median Income (AMI) as calculated by the U.S. Department of Housing and Urban Development (HUD) for the City of Albuquerque."</u>	Exempts affordable housing from parking requirements.	O-22-54 Section 5
21	272	5-5(C)(5)	Parking Reduction - Multi-family Dwellings in MX Zone Districts Add a new subsection with text as follows: <u>"Reduction for Multi-family Dwellings in Mixed-use Zone Districts</u> <u>The minimum number of off-street parking spaces required by Table 5-1-1 may be reduced by 75 percent if the proposed development is located in any Mixed-use zone district."</u>	Reduces parking requirements for multi-family development in MX zones.	O-22-54 Section 6
22	555	7-1	Dwelling Definitions Dwelling Unit, Accessory Revise text as follows: "A dwelling unit that is accessory to a primary single-family or two-family detached dwelling or <u>a non-residential primary use. Accessory dwelling units may be attached to the primary dwelling, contained within the primary dwelling, or built as a detached building.</u> This IDO distinguishes between accessory dwelling units with and without a kitchen. <u>A detached accessory dwelling unit is also considered an accessory building.</u> See also <u>Dwelling Definitions for Dwelling, Live/Work; Dwelling, Single-family Detached; and Dwelling, Two-family Detached (Duplex); Kitchen; and Measurement Definitions for Accessory Dwelling Unit.</u> "	Distinguishes a detached accessory dwelling unit (ADU) from a secondary kitchen in an existing primary residence, which is regulated as a separate allowable use in Table 4-2-1. Adds "accessory building" to the definition to clarify that regulations in Subsection 14-16-5-11(C)(4) apply. See associated proposed changes in Table 4-2-1 and Subsection 14-16-4-3(F)(5).	O-22-54 Section 2(H)

AGENCY COMMENTS



Mid-Region Metropolitan Planning Organization

Mid-Region Council of Governments

809 Copper Avenue NW
Albuquerque, New Mexico 87102
(505) 247-1750-tel. (505) 247-1753-fax
www.mrcog-nm.gov

TO: Alfredo Salas

FR: Peach Anderson-Tauzer, Outreach & Engagement Planner

RE: MRMPO Comments for Environmental Planning Commission Cases Scheduled for December 8, 2022 Hearing

November 21, 2022

The following staff comments relate to transportation systems planning within the Albuquerque Metropolitan Planning Area (AMPA). Principal guidance comes from the *2040 Metropolitan Transportation Plan (MTP)*; *Transportation Improvement Program (TIP) for FFY 2016-2021*; the *Intelligent Transportation Systems (ITS) Regional Architecture*; and the *Roadway Access Policies* of the Transportation Coordinating Committee (TCC) of the Metropolitan Transportation Board (MTB).

In keeping with the MTP's goals of optimizing mobility, enhancing economic linkages, increasing active transportation, and environmental resiliency (p.1-6, Table 1-1: Futures 2040 MTP Goals and Objectives), MRMPO recommends taking innovative approaches to address the housing shortage in Albuquerque and reducing the expansion of non-permeable surfaces and parking requirements to minimize urban heat and the impacts on existing hydrology.

Project# 2018-001843

RZ-2022-00054

MRMPO recommends approval of the Project based on the following comments:

- MRMPO supports parking maximums for the potential climate resiliency benefits of reduction in paved parking areas. Impervious surfaces increase volumes of surface water runoff in storm events and contribute to "urban heat island effect" by radiating absorbed heat from the sun and amplifying ambient air temperatures. Reducing impervious parking areas also potentially contributes to improved water quality and supply by allowing rainwater to be filtered through the soil and eventually stored in the aquifer.
- MRMPO supports reserving space and preparing to meet the increasing demand for electric vehicle charging infrastructure. Decarbonization of the transportation sector through continued electrification supports the MTP environmental resiliency goals of reducing greenhouse gas emissions.
- MRMPO supports providing for pedestrian and bicyclist connectivity through neighborhood design. Creating better connected networks for all modes of travel reduces the potential conflict between different users. Providing low-stress routes for pedestrians and bicyclists improves

accessibility by allowing people who are concerned about safety from traffic to reach destinations. In addition, improving connectivity improves efficiency by making trips more direct and reduces congestion by providing multiple routes to destinations.

Project# 2018-001843

RZ-2022-00059

MRMPO supports this Project considering the following:

The Bipartisan Infrastructure Law (BIL) sets forth policy that Metropolitan Planning Organizations (MPO's) such as MRMPO (Mid-Region Metropolitan Planning Organization), consider strategies that promote consistency between transportation improvements and local housing patterns and better connect workers and jobs. As such, MRMPO has a direct interest in the Integrated Development Ordinance (IDO) and proposals to amend the text.

The MRMPO supports efforts to increase the supply of market rate and affordable housing in Albuquerque. The Mortgage Finance Authority's Housing Strategy Report states that Bernalillo County is currently facing a shortage of 17,700 affordable rental units. This is contributing to the housing crisis in the region and specifically the housing cost burden on a County where 85,000 households, or one in every three spend more than 30% of their income on housing.

MRMPO adds that there are several co-benefits to increased housing to be gained from this Project:

IMPROVED ACCESS TO DAILY DESTINATIONS

- MRMPO has performed an initial analysis of the impact of the change in zoning to allow ADUs and duplexes in R-1 zoned land. It is projected that the majority of additional residential development related to the text amendment will take place east side of the Rio Grande, which has 176,000 homes in comparison to 76,000 homes on the west side. This is beneficial for our regional transportation systems because these parcels tend to have higher access to basic services such as shopping, groceries, medical care, educational opportunities, and transit. As demonstrated by the table below, there are significantly more existing acres utilized for supportive services east of the Rio Grande.

City of Albuquerque		Total Acres	
Land Use Code	Land Use Type	Eastside	Westside
1	Single Family Residential	20,618	9,751
3	Commercial Retail	2,336	879
4	Commercial Services	2,348	526
5	Office	1,907	121
6	Industrial/Warehouse	3,359	351
7	Medical	299	34
17	Community Uses	886	251

Source: CABQ Parcels

**Note: Tribal land, federal land, open space, roads, drainage and utilities are excluded from the acreage.*

HOUSEHOLD COST SAVINGS

- Transportation costs are a household's second greatest expense after housing. Greater access to goods and services also helps to reduce transportation costs for homeowners.

IMPROVED ACCESS TO JOBS

- Residential growth east of the Rio Grande provides households with greater access to jobs as well. In 2020 west of the Rio Grande there are 34,000 jobs and east of the Rio Grande there are 248,000 jobs.

LESS CONGESTION

- The 2035 Metropolitan Transportation Plan (MTP) presented a modeled scenario whereby 30,000 housing units were relocated from the west to the east side of the Rio Grande. The result was a systemwide reduction in vehicle hours of delay of 25% and 50,000 fewer river crossing trips per day. While there were more miles traveled on the east side in the scenario, the roads did not exceed capacity due to the existing capacity and redundancy of the grid system.

DECREASED ROAD COSTS

- According to the 2040 Connections MTP, residential development in areas that are already established will save the City costs in terms of roadways, both in upfront capital costs and in maintenance. This promotes the fiscal stewardship of public dollars.

OPPORTUNITY TO BUILD HOUSEHOLD WEALTH

- According to the MFA Housing Strategy report, there are 38,500 homeowners in Bernalillo County that spend over 30% of their income on housing expenses. The opportunity to add one to two units to their property will help families offset the cost of homeownership while expanding the supply of affordable units.

REDEVELOPMENT

- The MFA Housing Strategy report contains a call to action related to “redeveloping underutilized properties to increase supply and catalyze economic development.” This ordinance is in direct compliance with this goal.

MULTIGENERATIONAL HOUSING

- According to the University of New Mexico's Geospatial Population Studies, the number of persons 65 and over is expected to grow by **47,000** over the next 25 years in Bernalillo County. The ability to add units to existing residential lots allows the potential for multigenerational housing opportunities. More seniors will be able to age in place and maintain independence while being in proximity to services and care they may need.

LAND PRESERVATION

- According to the 2040 Connections MTP, residential development in areas that are already established promotes the preservation of open space, agricultural land, and rural communities. These are critical goals of the City of Albuquerque's Comprehensive Plan as well as a key element of the Target Scenario in the MTP.

Project# 2018-001843

RZ-2022-00054

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Project# 2018-001843

RZ-2022-00059

The MTP contains pathways that act as a toolbox to further support the MTP's goals. Appendix G of the MTP recommends the following relevant strategies that relate to both projects listed above:

- Adopt parking management strategies to decrease parking requirements in activity centers and redevelopment areas and increase parking costs in high demand locations.
- Adopt policies and standards that support Complete Streets and context sensitive design solutions for new and retrofitted infrastructure.
- Coordinate with local flood control authorities to increase/improve flood control infrastructure with roadway projects.
- Encourage place-making and the proliferation of community identity and innovation.
- Incentivize inclusion of green stormwater infrastructure and low impact design by offering expedited reviews, tiered fees, or exceptions to certain planning requirements such as setbacks or parking.
- Increase alternative housing concepts such as tiny homes, co-housing, multi-generational housing and accessory dwelling units.
- Promote a diverse mix of housing, in cost, unit types, and neighborhood settings.
- Promote shared parking agreements to maximize use of the existing supply.
- Require coordination of drainage and landscape plans to maximize efficient use of stormwater to meet vegetation irrigation needs.
- Support projects utilizing innovative technologies to improve regional competitiveness and sustainability.
- Target investment in street trees and shade structures in identified areas of extreme heat to provide relief and protection for the most vulnerable populations.

If you have any questions or require further information, please do not hesitate to contact me by e-mail at panderson-tauzer@mrcog-nm.gov.



PNM Comments
Environmental Planning Commission
Hearing Date: 08 December 2022

Project# 2018-001843 RZ-2022-00054 – Text Amendments to Integrated Development Ordinance (IDO)—City- wide	The City of Albuquerque Planning Department requests to amend the text of the Integrated Development Ordinance (IDO). This fourth annual update changes requested by neighbors, developers, staff, and Council Services. City-wide. Staff Planners: Michael Vos, Catalina Lehner
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PNM Comment PR-2018-001843 (City-wide)	No comment.
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Project# 2018-001843 RZ-2022-00059 – Text Amendments to Integrated Development Ordinance (IDO)—City- wide	The City of Albuquerque Planning Department requests to amend the text of the Integrated Development Ordinance (IDO) to address the need for more housing opportunities/ the Housing Forward initiative. This fourth annual update changes requested by neighbors, developers, staff, and Council Services. City-wide. Staff Planners: Michael Vos, Catalina Lehner
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PNM Comment PR-2021-001843 (Housing)	The PNM electric grid can support infill development and redevelopment that utilizes existing electric infrastructure. But the resulting increased electric load demands may require the installation of upgraded equipment (transformers, switches, etc.), enhanced easements, and/or upgraded power lines that can safely accommodate the resulting load growth.
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Increased electric load demands related to infill development and redevelopment will need corresponding adjustments and changes to processes and standards in the *Facility Plan: Electric System Transmission and Generation* to allow for greater flexibility and responsiveness in order to help advance the proposed housing opportunities.

Project# 2018-001843 RZ-2022-00055 – Text Amendments to Integrated Development Ordinance (IDO)— CPO 9- North Fourth Street	The City of Albuquerque Planning Department requests to amend the text of the Integrated Development Ordinance (IDO). This fourth annual update includes changes requested by neighbors, developers, staff, and Council Services to the standards applicable to one Small Area- North 4th Street Corridor CPO-9. Staff Planner: Leroy Duarte
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PNM Comment PR-2021-001843 (CPO-9)	There are PNM power lines along and within the 4 th Street right-of-way. The proposed requirement of a 6-foot setback for any portion of a building over 30 feet tall along 4 th Street may help promote compliance with National Electric Safety Code (NESC) safety clearances for buildings near existing power lines.
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Project# 2018-001843 RZ-2022-00056 – Text Amendments to Integrated Development Ordinance (IDO)—VPO 2- Northwest Mesa	The City of Albuquerque Planning Department requests to amend the text of the Integrated Development Ordinance (IDO). This fourth annual update includes changes requested by neighbors, developers, staff, and Council Services to the standards applicable to one Small Area- NW Mesa Escarpment VPO-2. Staff Planner: Megan Jones
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PNM Comment PR-2021-001843 (VPO-2)	Please make abundantly clear in <i>14-16-3-6 (D)(1) Applicability</i> and <i>14-16-3-6(E)(3) Building and Structure Height</i> that the VPO-2 height restrictions do not apply to any existing or proposed electric utility uses or facilities.
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PUBLIC NOTICE

**OFFICIAL PUBLIC NOTIFICATION FORM
FOR MAILED OR ELECTRONIC MAIL NOTICE
CITY OF ALBUQUERQUE PLANNING DEPARTMENT**



PART I - PROCESS

Use [Table 6-1-1](#) in the Integrated Development Ordinance (IDO) to answer the following:

Application Type: Amendment to IDO Text - Citywide

Decision-making Body: City Council

Pre-Application meeting required: ☐ Yes ☒ No

Neighborhood meeting required: ☐ Yes ☒ No

Mailed Notice required: ☒ Yes ☐ No [Only to NA Reps without email]

Electronic Mail required: ☒ Yes ☐ No

Is this a Site Plan Application: ☐ Yes ☒ No **Note: if yes, see second page**

PART II – DETAILS OF REQUEST

Address of property listed in application: City of Albuquerque - all properties

Name of property owner: All

Name of applicant: City of Albuquerque - Planning Department

Date, time, and place of public meeting or hearing, if applicable:

December 8, 2022, 8:30 am, Zoom: <https://cabq.zoom.us/j/2269592859> / (346) 248-7799, Meeting ID: 226 959 2859

Address, phone number, or website for additional information:

<https://abc-zone.com/ido-annual-update-2022>

PART III - ATTACHMENTS REQUIRED WITH THIS NOTICE

☐ Zone Atlas page indicating subject property.

☐ Drawings, elevations, or other illustrations of this request.

☐ Summary of pre-submittal neighborhood meeting, if applicable.

☒ Summary of request, including explanations of deviations, variances, or waivers. [See O-22-54]

IMPORTANT: PUBLIC NOTICE MUST BE MADE IN A TIMELY MANNER PURSUANT TO [SUBSECTION 14-16-6-4\(K\)](#) OF THE INTEGRATED DEVELOPMENT ORDINANCE (IDO). PROOF OF NOTICE WITH ALL REQUIRED ATTACHMENTS MUST BE PRESENTED UPON APPLICATION.

I certify that the information I have included here and sent in the required notice was complete, true, and accurate to the extent of my knowledge.

_____ (Applicant signature) 11/8/2022 (Date)

Note: Providing incomplete information may require re-sending public notice. Providing false or misleading information is a violation of the IDO pursuant to IDO Subsection 14-16-6-9(B)(3) and may lead to a denial of your application.

**OFFICIAL PUBLIC NOTIFICATION FORM
FOR MAILED OR ELECTRONIC MAIL NOTICE
CITY OF ALBUQUERQUE PLANNING DEPARTMENT**



PART IV – ATTACHMENTS REQUIRED FOR SITE PLAN APPLICATIONS ONLY

Provide a site plan that shows, at a minimum, the following: N/A - Not a Site Plan

- ☐ a. Location of proposed buildings and landscape areas.
- ☐ b. Access and circulation for vehicles and pedestrians.
- ☐ c. Maximum height of any proposed structures, with building elevations.
- ☐ d. For residential development: Maximum number of proposed dwelling units.
- ☐ e. For non-residential development:
 - ☐ Total gross floor area of proposed project.
 - ☐ Gross floor area for each proposed use.

[Note: Items with an asterisk (*) are required.]

Public Notice of a Proposed Project in the City of Albuquerque for Policy Decisions Mailed/Emailed to a Neighborhood Association

Date of Notice*: November 8, 2022

This notice of an application for a proposed project is provided as required by Integrated Development Ordinance (IDO) [Subsection 14-16-6-4\(K\) Public Notice](#) to:

Neighborhood Association (NA)*: All - See attachment

Name of NA Representative*: All - See attachment

Email Address* or Mailing Address* of NA Representative¹: All - See attachment

Information Required by [IDO Subsection 14-16-6-4\(K\)\(1\)\(a\)](#)

1. Subject Property Address* City of Albuquerque - all properties
Location Description All properties within City of Albuquerque boundary
2. Property Owner* Multiple
3. Agent/Applicant* [if applicable] City of Albuquerque - Planning Department
4. Application(s) Type* per IDO [Table 6-1-1](#) [mark all that apply]

☐ Zoning Map Amendment

☒ Other: Amendment to IDO Text - Citywide

Summary of project/request²*:

Amendments proposed by Ordinance 22-54, introduced at City Council on 11/7/2022

related to housing changes from the Mayor's Housing Forward Plan

5. This application will be decided at a public hearing by*:

☐ Environmental Planning Commission (EPC)

☒ City Council

This application will be first reviewed and recommended by:

☒ Environmental Planning Commission (EPC)

☐ Landmarks Commission (LC)

☐ Not applicable (Zoning Map Amendment – EPC only)

¹ Pursuant to [IDO Subsection 14-16-6-4\(K\)\(5\)\(a\)](#), email is sufficient if on file with the Office of Neighborhood Coordination. If no email address is on file for a particular NA representative, notice must be mailed to the mailing address on file for that representative.

² Attach additional information, as needed to explain the project/request.

[Note: Items with an asterisk (*) are required.]

Date/Time*: Thursday, December 8, 8:30 a.m.

Location*³: Zoom: <https://cabq.zoom.us/j/2269592859> / (346) 248-7799, Meeting ID: 226 959 2859

Agenda/meeting materials: <http://www.cabq.gov/planning/boards-commissions>

To contact staff, email devhelp@cabq.gov or call the Planning Department at 505-924-3860.

6. Where more information about the project can be found*⁴:
<https://abc-zone.com/ido-annual-update-2022>

Information Required for Mail/Email Notice by [IDO Subsection 6-4\(K\)\(1\)\(b\)](#):

1. Zone Atlas Page(s)*⁵ All - See <https://www.cabq.gov/planning/agis-maps>
2. Architectural drawings, elevations of the proposed building(s) or other illustrations of the proposed application, as relevant*: ~~Attached to notice or provided via website noted above~~ N/A
3. The following exceptions to IDO standards have been requested for this project*:

☐ Deviation(s) ☐ Variance(s) ☐ Waiver(s)

Explanation*:

N/A

4. A Pre-submittal Neighborhood Meeting was required by [Table 6-1-1](#): ☐ Yes ☒ No

Summary of the Pre-submittal Neighborhood Meeting, if one occurred:

N/A

³ Physical address or Zoom link

⁴ Address (mailing or email), phone number, or website to be provided by the applicant

⁵ Available online here: <http://data.cabq.gov/business/zoneatlas/>

[Note: Items with an asterisk (*) are required.]

Additional Information [Optional]:

From the IDO Zoning Map⁶:

1. Area of Property [typically in acres] City of Albuquerque boundaries
 2. IDO Zone District Multiple
 3. Overlay Zone(s) [if applicable] Application does not affect Overlay Zones
 4. Center or Corridor Area [if applicable] Multiple
- Current Land Use(s) [vacant, if none] Multiple
-

NOTE: For Zoning Map Amendment – EPC only, pursuant to [IDO Subsection 14-16-6-4\(L\)](#), property owners within 330 feet and Neighborhood Associations within 660 feet may request a post-submittal facilitated meeting. If requested at least 15 calendar days before the public hearing date noted above, the facilitated meeting will be required. To request a facilitated meeting regarding this project, contact the Planning Department at devhelp@cabq.gov or 505-924-3955.

Useful Links

Integrated Development Ordinance (IDO):

<https://ido.abc-zone.com/>

IDO Interactive Map

<https://tinyurl.com/IDOzoningmap>

Cc: All - See attachment [Other Neighborhood Associations, if any]

⁶ Available here: <https://tinurl.com/idozoningmap>

Cc List of Neighborhood Associations

ABQ Park NA	District 6 Coalition of	La Luz Landowners
ABQCore Neighborhood	Neighborhood Associations	Association
Association	District 7 Coalition of	La Mesa Community
Academy Estates East NA	Neighborhood Associations	Improvement Association
Academy Hills Park NA	District 8 Coalition of	La Sala Grande NA
Academy North NA	Neighborhood Associations	Incorporated
Academy Park HOA	Downtown Neighborhoods	Ladera West NA
Academy Ridge East NA	Association	Las Lomitas NA
Alameda North Valley	East Gateway Coalition	Las Terrazas NA
Association	Eastrange Piedra Vista NA	Laurelwood NA
Alamosa NA	Eastridge NA	Lee Acres NA
Albuquerque Meadows	EDo NA Incorporated	Loma Del Rey NA
Residents Association	El Camino Real NA	Los Alamos Addition NA
Altura Addition NA	Elder Homestead NA	Los Altos Civic Association
Altura Park NA	Embudo Canyon NA	Los Duranes NA
Alvarado Gardens NA	Enchanted Park NA	Los Griegos NA
Alvarado Park NA	Fair West NA	Los Poblanos NA
Anderson Hills NA	Four Hills Village Association	Los Volcanes NA
Antelope Run NA	Gavilan Addition NA	Mark Twain NA
Arroyo Del Oso North NA	Glenwood Hills NA	McDuffie Twin Parks NA
Avalon NA	Greater Gardner &	McKinley NA
Barelas NA	Monkbridge NA	Mesa Del Sol NA
Bear Canyon NA	Heritage East Association of	Mile Hi NA
BelAir NA	Residents	Molten Rock NA
Campus NA	Heritage Hills NA	Monte Largo Hills NA
Cherry Hills Civic Association	Highland Business and NA	Monterey Manor NA
Cibola Loop NA	Incorporated	Mossman NA
Cibola NA	Highlands North NA	Mossman South NA
Cielito Lindo NA	Hodgin NA	Near North Valley NA
Citizens Information	Hoffmantown NA	Netherwood Park NA
Committee of Martineztown	Huning Castle NA	Nob Hill NA
Classic Uptown NA	Huning Highland Historic	Nor Este NA
Clayton Heights Lomas del	District Association	North Albuquerque Acres
Cielo NA	Indian Moon NA	Community Association
Comanche Foothills NA	Inez NA	North Campus NA
Countrywood Area NA	Jerry Cline Park NA	North Domingo Baca NA
Crestview Bluff Neighbors	John B Robert NA	North Eastern Association of
Association	Juan Tabo Hills NA	Residents
Del Norte NA	Kirtland Community	North Valley Coalition
Del Webb Mirehaven NA	Association	North Wyoming NA
District 4 Coalition of	Knapp Heights NA	Ocate NA
Neighborhood Associations	La Luz Del Sol NA	Oso Grande NA

Palomas Park NA
Paradise Hills Civic
Association
Parkland Hills NA
Parkway NA
Pat Hurley NA
Peppertree Royal Oak
Residents Association
Piedras Marcadas NA
Pueblo Alto NA
Quaker Heights NA
Quigley Park NA
Quintessence NA
Rancho Sereno NA
Raynolds Addition NA
Rio Grande Boulevard NA
Riverview Heights NA
Route 66 West NA
San Jose NA
Sandia High School Area NA
Sandia Vista NA
Santa Barbara Martineztown
NA
Santa Fe Village NA
Sawmill Area NA
Siesta Hills NA
Silver Hill NA

Singing Arrow NA
Snow Heights NA
South Broadway NA
South Guadalupe Trail NA
South Los Altos NA
South San Pedro NA
South Valley Coalition of
Neighborhood Associations
South West Alliance of
Neighborhoods (SWAN
Coalition)
Southeast Heights NA
Spruce Park NA
SR Marmon NA
Stardust Skies North NA
Stardust Skies Park NA
Stinson Tower NA
Stronghurst Improvement
Association Incorporated
Summit Park NA
Supper Rock NA
Sycamore NA
Taylor Ranch NA
The Courtyards NA
The Paloma Del Sol NA
The Quail Springs NA
Thomas Village NA

Tres Volcanes NA
Trumbull Village Association
Tuscany NA
University Heights NA
Valle Prado NA
Valley Gardens NA
Vecinos Del Bosque NA
Victory Hills NA
Vineyard Estates NA
Vista Del Mundo NA
Vista Del Norte Alliance
Vista Grande NA
Vista Magnifica Association
Wells Park NA
West La Cueva NA
West Mesa NA
West Old Town NA
West Park NA
Westgate Heights NA
Westside Coalition of
Neighborhood Associations
Wildflower Area NA
Willow Wood NA
Winrock South NA
Yale Village NA

From: Camrona, Delaina L.
To: Ben Whitmore, Mikaela J.
Subject: City Council - Text Amendment to IDO Citywide Public Notice Inquiry Sheet Submission
Date: Tuesday, November 8, 2022 8:05:11 AM
Attachments: image001.png
 image002.png
 image003.png
 image004.png
 City Council - Text Amendment to IDO Citywide Public Notice Inquiry Sheet Submission.xlsx
 image006.png

PLEASE NOTE:

The City Council recently voted to update the Neighborhood Association Recognition Ordinance (NARO) and the Office of Neighborhood Coordination (ONC) is working to ensure all neighborhood associations and neighborhood coalitions are in compliance with the updated ordinance. There will likely be many updates and changes to association and coalition contact information over the next several months. With that in mind, please check with the ONC every two (2) weeks to ensure that the contact information you have for associations and coalitions is up to date.

Dear Applicant:

Please find the neighborhood contact information listed below. Please make certain to read the information further down in this e-mail as it will help answer other questions you may have.

Association Name	First Name	Last Name	Email	Address Line 1	Address Line 2	City	State	Zip	Mobile Phone	Phone	Phone Extension
ABQ Park NA	Tiffany	Mojarro	tiffany.m1274@gmail.com	7504 Sky Court Circle NE		Albuquerque	NM	87110	5053632643		
ABQ Park NA	Shirley	Lockyer	shirleylockyer@gmail.com	7501 Sky Court Circle NE		Albuquerque	NM	87110	5057107314		
ABQCore Neighborhood Association	Rick	Rennie	rickrennie@comcast.net	326 Lucero Road		Albuquerque	NM	87048		5054502182	
ABQCore Neighborhood Association	Joaquin	Baca	bacajoaquin9@gmail.com	100 Gold Avenue	#408	Albuquerque	NM	87102		5054176689	
Academy Estates East NA	James	Santistevan	dukecity777@yahoo.com	5609 Cometa Court NE		Albuquerque	NM	87111		5054508385	
Academy Estates East NA	Larry	Pope	lepope@msn.com	9000 Galaxia Way NE		Albuquerque	NM	87111		5058213077	
Academy Hills Park NA	Nadine	Waslosky	nwaslosky@comcast.net	9816 Compadre Lane NE		Albuquerque	NM	87111		5053621808	
Academy Hills Park NA	Donald	Couchman	dhc@zianet.com	6441 Concordia Road NE		Albuquerque	NM	87111	5052698335	5058212421	
Academy North NA	Debra	Wehling	dwehling@outlook.com	8112 Ruidoso NE		Albuquerque	NM	87109		5052807779	
Academy North NA	Adam	Warrington	adamjwar@hotmail.com	8400 Parrot Run Road NE		Albuquerque	NM	87109		5056101820	
Academy Park HOA	William	Pratt	prattsalwm@yahoo.com	6753 Kelly Ann Road NE		Albuquerque	NM	87109		5058561009	
Academy Park HOA	Chris	Ocksrider	chris@ocksriderlawfirm.com	6733 Kelly Ann Road NE		Albuquerque	NM	87109		5054894477	
Academy Ridge East NA	Ellen	Wilsey	elliellw@comcast.net	10828 Academy Ridge Road NE		Albuquerque	NM	87111		5055033821	
Academy Ridge East NA	Tom	Arnold	arnoldtom@yahoo.com	10901 Academy Ridge Road NE		Albuquerque	NM	87111	5055730535		
Alameda North Valley Association	Steve	Wentworth	anvanews@aol.com	8919 Boe Lane NE		Albuquerque	NM	87113		5058973052	
Alamosa NA	Jeanette	Baca	jeanettebaca973@gmail.com	900 Field SW		Albuquerque	NM	87121	5053792976	5058362976	
Alamosa NA	Jerry	Gallegos	jgallegoswccdg@gmail.com	5921 Central Avenue NW		Albuquerque	NM	87105	5053855809	5058362976	
Albuquerque Meadows Residents Association	Frances	Cunzeman	jc.fc.cunz@gmail.com	7112 Pan American E Frwy	#388	Albuquerque	NM	87109	4102920596		
Albuquerque Meadows Residents Association	Judy	Green	sandiajg@hotmail.com	7112 Pan American E Frwy	#25	Albuquerque	NM	87109		5052289486	
Altura Addition NA	Denise	Hammer	archhero@aol.com	1735 Aliso Drive NE		Albuquerque	NM	87110		5052681250	
Altura Addition NA	Colin	Adams	colinadams@earthlink.net	1405 Solano Drive NE		Albuquerque	NM	87110		5055440666	
Altura Park NA	Neal	Spero	nspero@phs.org	4205 Hannett NE		Albuquerque	NM	87110	7346585577		
Altura Park NA	Robert	Jackson	rajackso@msn.com	4125 Hannett NE		Albuquerque	NM	87110		5052101458	
Alvarado Gardens NA	Mike	Dexter	medexter49@gmail.com	3015 Calle San Ysidro NW		Albuquerque	NM	87107	5052897648		
Alvarado Gardens NA	Diana	Hunt	president@alvaradoneighborhood.com	2820 Candelaria Road NW		Albuquerque	NM	87107		5053635913	
Alvarado Park NA	Mary	Erwin	marybe9@gmail.com	PO Box 35704		Albuquerque	NM	87176	5052508158		
Alvarado Park NA	Elissa	Dente	elissa.dente@gmail.com	PO Box 35704		Albuquerque	NM	87176	5055733387		
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Anderson Hills NA	Jan	LaPitz	jlapitz@hotmail.com	3120 Rio Plata Drive SW		Albuquerque	NM	87121		5058774159	
Antelope Run NA	Dean	Willingham	dwillingham@redw.com	11809 Ibox Avenue NE		Albuquerque	NM	87111	5052502679	5052938986	
Antelope Run NA	Alex	Robinson	alexlrnm@comcast.net	12033 Ibox Avenue NE		Albuquerque	NM	87111	5056109561	5052940473	
Arroyo Del Oso North NA	Willie	Orr	willieorr1@msn.com	7930 Academy Trail NE		Albuquerque	NM	87109	3039105707		
Arroyo Del Oso North NA	Max	Dubroff	adonneighborhood@gmail.com	7812 Charger Trail NE		Albuquerque	NM	87109		5053856039	
Avalon NA	Joseph	Damon	avalonnw@comcast.net	9205 Harbor Road NW		Albuquerque	NM	87121		5052709643	
Avalon NA	Lucy	Anchondo	avalon3a@yahoo.com	601 Stern Drive NW		Albuquerque	NM	87121		5058396601	
Barelas NA	Courtney	Bell	liberty.c.bell@icloud.com	500 2nd Street SW	#9	Albuquerque	NM	87102		5059299397	
Barelas NA	Lisa	Padilla	lisa@swop.net	904 3rd Street SW		Albuquerque	NM	87102		5054537154	
Bear Canyon NA	Patsy	Beck	patsybeck@aol.com	7518 Bear Canyon Road NE		Albuquerque	NM	87109		5052397897	
Bear Canyon NA	Brian	Stone	bstone@yahoo.com	5800 La Madera NE		Albuquerque	NM	87109	5052715356		
BelAir NA	Seth	Arseneau	ions82@hotmail.com	2838 Manzano Street NE		Albuquerque	NM	87110	5059078314		
BelAir NA	Barb	Johnson	flops2@juno.com	2700 Hermosa Drive NE		Albuquerque	NM	87110	5053796187	5058890293	
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Campus NA	Calvin	Martin	calmartin93@gmail.com	411 Girard Avenue NE		Albuquerque	NM	87106		5054127669	
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Cherry Hills Civic Association	Ellen	Dueweke	edueweke@juno.com	8409 Cherry Hills Road NE		Albuquerque	NM	87111	5055731537		
Cibola Loop NA	Ginny	Forrest	gforrest47@comcast.net	4113 Logan Road NW		Albuquerque	NM	87114	5054170373		
Cibola Loop NA	Julie	Rael	learrael@aol.com	10700 Del Sol Park Drive NW		Albuquerque	NM	87114	5052358189		
Cibola NA	Michael	Alexander	michael.alexander@altadt.com	2516 Madre Drive NE		Albuquerque	NM	87112		5052842486	
Cibola NA	Joseph	Freedman	josefree@yahoo.com	13316 Tierra Montanosa Drive NE		Albuquerque	NM	87112	7033077929		
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Cielito Lindo NA	Patricia	Duda	pat.duda.52@gmail.com	3720 Camino Capistrano NE		Albuquerque	NM	87111	5054403735	5052922015	
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Classic Uptown NA	Bert	Davenport	brt25@pm.me	2921 San Pablo Street NE		Albuquerque	NM	87110	7736206636		
Clayton Heights Lomas del Cielo NA	Eloisa	Molina-Dodge	e_molinadodge@yahoo.com	1704 Buena Vista SE		Albuquerque	NM	87106		5055015051	

Clayton Heights Lomas del Cielo NA	Isabel	Cabrera	boyster2018@gmail.com	1720 Buena Vista SE		Albuquerque	NM	87106	5056592414	5052424494	
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Countrywood Area NA	Christine	Messersmith	cmessersmith@q.com	7904 Woodridge Drive NE		Albuquerque	NM	87109	5052634181		
Crestview Bluff Neighbors Association	Alfred	Otero	alotero57@gmail.com	414 Crestview Drive SW		Albuquerque	NM	87105		5057105749	
Crestview Bluff Neighbors Association	Stephanie	Gilbert		908 Alta Vista Court SW		Albuquerque	NM	87105	5059445528		
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Del Webb Mirehaven NA	Elizabeth	Smith Chavez	elizabethsmithchavez@gmail.com	2315 Woods Wash Way NW		Albuquerque	NM	87120	6192036153		
District 4 Coalition of Neighborhood Associations	Mark	Reynolds	reynolds@unm.edu	6801 Barber PI NE		Albuquerque	NM	87109		5053212968	
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District 6 Coalition of Neighborhood Associations	Mandy	Warr	mandy@theremedaydayspa.com	119 Vassar Drive SE		Albuquerque	NM	87106	5054014367	5052659219	
District 6 Coalition of Neighborhood Associations	Patricia	Willson	info@willsonstudio.com	505 Dartmouth Drive SE		Albuquerque	NM	87106	5059808007		
District 7 Coalition of Neighborhood Associations	Tyler	Richter	tyler.richter@gmail.com	801 Madison NE		Albuquerque	NM	87110	5052392903		
District 8 Coalition of Neighborhood Associations	Donald	Couchman	dhc@zianet.com	6441 Concordia Road NE		Albuquerque	NM	87111	5052698335	5058212421	
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East Gateway Coalition	Michael	Brasher	eastgatewaycoalition@gmail.com	216 Zena Lona NE		Albuquerque	NM	87123	5053822964	5052988312	
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Eastrange Piedra Vista NA	Robert	Harris	robtsharris@aol.com	824 Piedra Vista Road NE		Albuquerque	NM	87123		5052355844	
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Eastringe NA	Verrity	Gershin	verrityg@yahoo.com	12017 Donna Court NE		Albuquerque	NM	87112		5052280640	
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Edo NA Incorporated	David	Tanner	david@edoabq.com	124 Edith Boulevard SE		Albuquerque	NM	87102		5052059229	
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El Camino Real NA	Linda	Trujillo	trujilloabqbc@comcast.net	PO Box 27288		Albuquerque	NM	87125	5054140595	5053441704	
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Elder Homestead NA	Sandra	Perea	sp-wonderwoman@comcast.net	800 California Street SE		Albuquerque	NM	87108	5052280918		
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Embudo Canyon NA	Julie	Dreike	presidentecn2020@gmail.com	13917 Indian School Road NE		Albuquerque	NM	87112	5053218595	5052996670	
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Enchanted Park NA	Gary	Beyer	financialhelp@earthlink.net	11620 Morenci Avenue NE		Albuquerque	NM	87112		5052932056	
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Fair West NA	Sharon	Lawson	artisticmediacoop@gmail.com	405 Cardenas Drive NE		Albuquerque	NM	87108		5052443537	
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Gavilan Addition NA	Alice	Ernst	slernst@aol.com	5921 Pauline Street NW		Albuquerque	NM	87107		5053444533	
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Glenwood Hills NA	Forest	Owens	woody761@yahoo.com	12812 Cedarbrook NE		Albuquerque	NM	87111	5054537728		
Greater Gardner & Monkbridge NA	David	Wood	wood_cpa@msn.com	158 Pleasant Avenue NW		Albuquerque	NM	87107	5052212626	5053446674	
Heritage East Association of Residents	Daniel	Martinez	realtyofnewmexico@gmail.com	9109 Ridgefield NE		Albuquerque	NM	87109	5052633075		
Heritage East Association of Residents	Paul	Jessen	willpawl@msn.com	9304 San Rafael Avenue NE		Albuquerque	NM	87109	5053133684		
Heritage Hills NA	Homer	Gonzales	hgabq1985@gmail.com	8924 Armistice Road NE		Albuquerque	NM	87109		5052350215	
Heritage Hills NA	Christy	Burton	christy_burton@hotmail.com	8709 Palomar Avenue NE		Albuquerque	NM	87109	5053074058	5058234474	
Highland Business and NA Incorporated	Melissa	Pacheco	melissa.ann.pacheco@gmail.com	213 Madison Street NE		Albuquerque	NM	87108		5059997999	
Highland Business and NA Incorporated	Omar	Durant	omardurant@yahoo.com	305 Quincy Street NE		Albuquerque	NM	87108		5052654949	
Highlands North NA	Elena	Hernandez	elena.hernandez.homes@gmail.com	6701 Arroyo del Oso Avenue NE		Albuquerque	NM	87109		5056882046	
Highlands North NA	Mark	Reynolds	reynolds@unm.edu	6801 Barber PI NE		Albuquerque	NM	87109		5053212968	
Hodgin NA	Marilyn	Strube	mstrube@greer-stafford.com	4721 Delamar NE		Albuquerque	NM	87110		5052504314	
Hodgin NA	Pat	Mallory	malloryabq@msn.com	3916 Douglas MacArthur Road NE		Albuquerque	NM	87110	5052211567		
Hoffmantown NA	Pamela	Pettit		2710 Los Arboles Place NE		Albuquerque	NM	87112		5052991609	
Hoffmantown NA	Stephanie	O'Guin	smurfmom@comcast.net	2711 Mesa Linda Drive NE		Albuquerque	NM	87112		5058040357	
Huning Castle NA	Deborah	Allen	debzallen@ymail.com	206 Laguna Boulevard SW		Albuquerque	NM	87104		5052923644	
Huning Castle NA	Harvey	Buchalter	hcbuchalter@gmail.com	1615 Kit Carson SW		Albuquerque	NM	87104	5052702495	5052472602	
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Huning Highland Historic District Association	Ann	Carson	annlouiscarson@gmail.com	416 Walter SE		Albuquerque	NM	87102		5052421143	
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Inez NA	Maya	Sutton	yemaya@swcp.com	7718 Cutler Avenue NE		Albuquerque	NM	87110		5052478070	
Inez NA	Donna	Yetter	donna.yetter3@gmail.com	2111 Hoffman Drive NE		Albuquerque	NM	87110	5055504715		
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John B Robert NA	Sue	Hilts	suzy0910@comcast.net	11314 Overlook NE		Albuquerque	NM	87111		5052751758	
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Juan Tabo Hills NA	Richard	Lujan	richtriple777@msn.com	11819 Blue Ribbon NE		Albuquerque	NM	87123			
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Knapp Heights NA	Daniel	Regan	direganabq@gmail.com	4109 Chama Street NE		Albuquerque	NM	87109	5052802549		
La Luz Del Sol NA	Maureen	Fitzgibon	mofitz48@gmail.com	23 Mill Road NW		Albuquerque	NM	87120	6085160195		
La Luz Del Sol NA	Arthur	Woods	sandia@flylonecone.com	33 Wind Road NW		Albuquerque	NM	87120	5059745301		
La Luz Landowners Association	Dan	Jensen	dgj.illa.board@gmail.com	7 Arco NW		Albuquerque	NM	87120		5056100742	
La Luz Landowners Association	Tim	Bowen	timbowen9@aol.com	9 Arco NW		Albuquerque	NM	87120		5052590931	
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La Mesa Community Improvement Association	Idalia	Lechuga-Tena	idalialt@gmail.com	PO Box 8653		Albuquerque	NM	87198	5055503868		
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Las Lomitas NA	Nancy	Griego	r.griego04@comcast.net	8024 Corte Del Viento NW		Albuquerque	NM	87120	5052286650		
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Las Terrazas NA	David	Steidley	steidley@centurylink.net	8434 Rio Verde Place NW		Albuquerque	NM	87120	5052496367		
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Lee Acres NA	Allyson	Esquibel	abroyer1@msn.com	914 Fairway Road NW		Albuquerque	NM	87107	5052285789		
Loma Del Rey NA	Jessica	Armijo	jarmijo12@outlook.com	3701 Erbbe Street NE		Albuquerque	NM	87111		5054001221	
Loma Del Rey NA	Carol	Orona	oronacarol@hotmail.com	8416 Palo Duro Avenue NE		Albuquerque	NM	87111		5052948016	
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Los Alamos Addition NA	Don	Dudley	don.dudley@dondudleydesign.com	302 Sandia Road NW		Albuquerque	NM	87107	5052806280		
Los Altos Civic Association	Darlene	Solis	darlenesolis.laca@gmail.com	915 Rio Vista Circle SW		Albuquerque	NM	87105	5059803592		
Los Altos Civic Association	Athena	La Roux	athenalaroux@yahoo.com	2831 Los Altos Place SW		Albuquerque	NM	87105	5125297048		
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Los Griegos NA	Mary Beth	Thorn	marybethorn@gmail.com	4530 San Isidro Street NW		Albuquerque	NM	87107	2526755366		
Los Poblanos NA	Don	Newman	don.newman@mac.com	5723 Guadalupe Trail NW		Albuquerque	NM	87107		5053443900	
Los Poblanos NA	Karon	Boutz	kjboutz@gmail.com	1007 Sandia Road NW		Albuquerque	NM	87107		5053456002	
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Los Volcanes NA	Jenny	Sanchez	jennybsanchez1@q.com	6512 Honeylocust Avenue NW		Albuquerque	NM	87121		5058360117	
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McDuffie Twin Parks NA	Cathy	Drake	drakelavellefamily@gmail.com	4203 Avenida La Resolana NE		Albuquerque	NM	87110	5052350405		
McKinley NA	Marjorie	Padilla	mp1646@gmail.com	3616 Aztec Road NE		Albuquerque	NM	87110		5058811646	
McKinley NA	Geraldine	Griego	griegocruz@comcast.net	3018 Solano Drive NE		Albuquerque	NM	87110	5052592517	5058811281	
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Molten Rock NA	Mary Ann	Wolf-Lyerla	maryann@hlsnm.org	5608 Popo Drive NW		Albuquerque	NM	87120		5058992682	
Monte Largo Hills NA	Tom	Burkhalter		13104 Summer Place NE		Albuquerque	NM	87112		5052392151	
Monte Largo Hills NA	Susan	Law	susanlaw009@comcast.net	13101 Summer Place NE		Albuquerque	NM	87112		5052967719	
Monterey Manor NA	Cindy	Miller	golfcindy5@gmail.com	12208 Casa Grande Avenue NE		Albuquerque	NM	87112		5052719466	
Mossman NA	Marya	Sena	maryasena1@gmail.com	3418 Dakota Street NE		Albuquerque	NM	87110		5052613660	
Mossman NA	Lori	Jameson	jamesonlr@outlook.com	3543 Dakota Street NE		Albuquerque	NM	87110		5053061069	
Mossman South NA	Brittany	Ortiz	britt@chipotlebutterfly.com	6213 Alta Monte NE		Albuquerque	NM	87110		5054104153	
Mossman South NA	Sarah	Couch	wordsongLLC@gmail.com	6224 Alta Monte NE		Albuquerque	NM	87110		5056108295	
Near North Valley NA	Jacob	Trujillo	nearnorthvalleya@gmail.com	PO Box 6953		Albuquerque	NM	87197	5052213670	5059487162	
Near North Valley NA	Joe	Sabatini	jsabatini423@gmail.com	3514 6th Street NW		Albuquerque	NM	87107	5058507455	5053449212	
Netherwood Park NA	Sara	Mills	saramills@comcast.net	2629 Cutler Avenue NE		Albuquerque	NM	87106	5054506712		
Netherwood Park NA	William	Gannon	wgannon@unm.edu	1726 Notre Dame NE		Albuquerque	NM	87106	5052497906		
Nob Hill NA	Jeff	Hoehn	jeffh@clnabq.org	411 Aliso Drive SE		Albuquerque	NM	87108		5055069327	
Nob Hill NA	Gary	Eyster	meyster1@me.com	316 Amherst Drive NE		Albuquerque	NM	87106	5059911388		
Nor Este NA	Uri	Bassan	uri.bassan@noreste.org	9000 Modesto Avenue NE		Albuquerque	NM	87122	5054179990		
Nor Este NA	Gina	Pioquinto	rpmartinez003@gmail.com	9015 Moonstone Drive NE		Albuquerque	NM	87113	5052385495	5058560926	
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North Domingo Baca NA	Judie	Pellegrino	judiepellegirino@gmail.com	8515 Murrelet NE		Albuquerque	NM	87113		5058218516	
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North Valley Coalition	Peggy	Norton	peggynorton@yahoo.com	P.O. Box 70232		Albuquerque	NM	87197	5058509293	5053459567	
North Valley Coalition	Doyle	Kimbrough	newmexmba@aol.com	2327 Campbell Road NW		Albuquerque	NM	87104	5052490938	5053441363	
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Onate NA	Sharon	Ruiz	srz29@aol.com	1821 Paige Place NE		Albuquerque	NM	87112	5052219565	5052981570	
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Oso Grande NA	Bob	Fass	nobullbob1@gmail.com	5226 Edwards Drive NE		Albuquerque	NM	87111		5052394774	
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Palomas Park NA	David	Marsh	wmarsh7@comcast.net	7504 Laster Avenue NE		Albuquerque	NM	87109	5054531644		
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Parkway NA	Mary	Loughran	marykloughran@comcast.net	8015 Fallbrook Place NW		Albuquerque	NM	87120	5052497841	5058367841	
Parkway NA	Ruben	Aleman	m_raleman@yahoo.com	8005 Fallbrook Place NW		Albuquerque	NM	87120	5053852189		
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Pat Hurley NA	Julie	Radoslovich	julieradoslovich@gmail.com	235 Mezal Circle NW		Albuquerque	NM	87105	5053524440		
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Peppertree Royal Oak Residents Association	Art	Verardo	a.verardo@comcast.net	11901 San Victorio Avenue NE		Albuquerque	NM	87111	5053796721	5052966602	
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Piedras Marcadas NA	Debbie	Koranyi	debbie.a.koranyi@gmail.com	9323 Drolet NW		Albuquerque	NM	87114	5059919651		
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Quaker Heights NA	Orlando	Martinez	lilog2002@yahoo.com	5808 Jones Place NW		Albuquerque	NM	87120	5053605017	5053605038	
Quaker Heights NA	Vanessa	Alarid	valarid@gmail.com	5818 Jones Place NW		Albuquerque	NM	87120	5055030640	5055030640	
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Quintessence NA	Andrea	Landaker	president@qna-abq.org	10012 Coronado Avenue NE		Albuquerque	NM	87122	5057972466		
Rancho Sereno NA	Sander	Rue	sanderrue@comcast.net	7500 Rancho Solano Court NW		Albuquerque	NM	87120	5053010189		
Rancho Sereno NA	Debra	Cox	debracox62@comcast.net	8209 Rancho Paraiso NW		Albuquerque	NM	87120	5052388563	5057920448	
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Raynolds Addition NA	Margaret	Lopez	raynoldsneighborhood@gmail.com	1315 Gold Avenue SW		Albuquerque	NM	87102	5052899857		
Rio Grande Boulevard NA	Eleanor	Walther	eawalth@comcast.net	2212 Camino De Los Artesanos NW		Albuquerque	NM	87107		5053421820	
Rio Grande Boulevard NA	Doyle	Kimbrough	newmexmba@aol.com	2327 Campbell Road NW		Albuquerque	NM	87104	5052490938	5053441363	
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Riverview Heights NA	Cyrus	Toll	tollhouse1@msn.com	1306 Riverview Drive NW		Albuquerque	NM	87105	5052052513	5058311657	
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San Jose NA	Olivia	Greathouse	sjnase@gmail.com	408 Bethel Drive SE		Albuquerque	NM	87102			
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Santa Barbara Martineztown NA	Theresa	Illgen	theresa.illgen@aps.edu	214 Prospect NE		Albuquerque	NM	87102			
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Santa Fe Village NA	Jane	Baechle	jane.baechle@gmail.com	7021 Lamar Avenue NW		Albuquerque	NM	87120	5054006516		
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Snow Heights NA	Laura	Garcia	laurasmigi@aol.com	1404 Katie Street NE		Albuquerque	NM	87110	5052355858		
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South Broadway NA	Frances	Armijo	fparmijo@gmail.com	915 William SE		Albuquerque	NM	87102	5054003473	5052478798	
South Guadalupe Trail NA	Heather	Brislen	brislen@gmail.com	4905 Guadalupe Trail NW		Albuquerque	NM	87107	5052803126		
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South Los Altos NA	Stephen	Martos-Ortiz	sdmartos91@gmail.com	429 General Somervell Street NE		Albuquerque	NM	87123		5058037736	
South San Pedro NA	Khadijah	Bottom	khadijahasil@vizionz.org	1200 Madeira SE	#130	Albuquerque	NM	87108		5058327141	
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South West Alliance of Neighborhoods (SWAN Coalition)	Luis	Hernandez Jr.	luis@wccdg.org	5921 Central Avenue NW		Albuquerque	NM	87105			
South West Alliance of Neighborhoods (SWAN Coalition)	Jerry	Gallegos	jgallegoswccdg@gmail.com	5921 Central Avenue NW		Albuquerque	NM	87105	5053855809	5058362976	
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Southeast Heights NA	John	Pate	jpate@molzencorbin.com	1007 Idlewild Lane SE		Albuquerque	NM	87108	5052354193	5052552984	
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Spruce Park NA	Bart	Cimenti	bartj505@gmail.com	1502 Roma Avenue NE		Albuquerque	NM	87106		5052591918	
SR Marmon NA	Sally	Powell	sally@srma.org	3301 Coors Boulevard NW	#R170	Albuquerque	NM	87120		5056200068	
SR Marmon NA	Em	Ward	info@srma.org	PO Box 7434		Albuquerque	NM	87194	5053048167		
Stardust Skies North NA	Tillery	Dingler	tillery3@icloud.com	7727 Hermanson Place NE		Albuquerque	NM	87110	5052200484		
Stardust Skies North NA	Mary	Hawley	mtbsh@comcast.net	7712 Hendrix Road NE		Albuquerque	NM	87110	5052595849		
Stardust Skies Park NA	Matt	Stratton	mateo.stratton@gmail.com	7309 Bellrose NE		Albuquerque	NM	87110	5054170004		
Stardust Skies Park NA	Kim	Lovely-Peake	lovelypeake@comcast.net	7100 Bellrose NE		Albuquerque	NM	87110		5052687969	
Stinson Tower NA	Bruce	Rizzieri	stnapres@outlook.com	1225 Rael Street SW		Albuquerque	NM	87121	5055858096		
Stinson Tower NA	Lucy	Arzate-Boyles	arzate.boyles2@yahoo.com	3684 Tower Road SW		Albuquerque	NM	87121	5059343035		
Stronghurst Improvement Association Incorporated	Mark	Lines	abderdaber@comcast.net	3010 Arno Street NE		Albuquerque	NM	87107		5052504129	
Stronghurst Improvement Association Incorporated	William	Sabatini	wqsabatini@gmail.com	2904 Arno Street NE		Albuquerque	NM	87107	5052500497		
Summit Park NA	Kate	Franchini	franchini.kathryn@gmail.com	1809 Rita Drive NE		Albuquerque	NM	87106		5052699244	
Summit Park NA	Joe	Brooks	joebrooks@homesinabq.com	1418 Wellesley Drive NE		Albuquerque	NM	87106	5059773474		
Supper Rock NA	Kathleen	Schindler-Wright	srock692@comcast.net	PO Box 50577		Albuquerque	NM	87101		5052752710	
Supper Rock NA	Ken	O'Keefe	cnkokeefe@msn.com	600 Vista Abajo Drive NE		Albuquerque	NM	87123		5052969075	
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Taylor Ranch NA	Rene	Horvath	aboard111@gmail.com	5515 Palomino Drive NW		Albuquerque	NM	87120	5059852391	5058982114	
The Courtyards NA	Jackie	Cooke	jackiecooke@comcast.net	8015 Dark Mesa NW		Albuquerque	NM	87120	4105985453	5058390388	
The Courtyards NA	Jayne	Aubele	jaubele1012@comcast.net	2919 Monument Drive NW		Albuquerque	NM	87120	5059808703	5053526390	
The Paloma Del Sol NA	Roland	Quintana	rq1dq1@gmail.com	10412 Calle Contento NW		Albuquerque	NM	87114	5052637220		
The Paloma Del Sol NA	Bob	McElearney	bob.mcelearney@yahoo.com	5009 San Timoteo Avenue NW		Albuquerque	NM	87114	3122184454		
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The Quail Springs NA	Goldialu	Stone	gstone@swcp.com	7116 Quail Springs Place NE		Albuquerque	NM	87113		5057975597	
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Tres Volcanes NA	Thomas	Borst	t0m2pat@yahoo.com	1908 Selway Place NW		Albuquerque	NM	87120	5058034836	5053526563	
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Tuscany NA	Janelle	Johnson	vistadelnorte@me.com	PO Box 6270		Albuquerque	NM	87197		5053440822	
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University Heights NA	Don	Hancock	sricdon@earthlink.net	105 Stanford SE		Albuquerque	NM	87106	5052622053	5052621862	
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Vineyard Estates NA	Elizabeth	Meek	djesmeek@comcast.net	8301 Mendocino Drive NE		Albuquerque	NM	87122		5055080806	
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Vista Del Mundo NA	Dennis	Roach	dproach@sandia.gov	13812 Spirit Trail NE		Albuquerque	NM	87112			
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Vista Grande NA	Richard	Schaefer	Schaefer@unm.edu	3579 Sequoia Place NW		Albuquerque	NM	87120			
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Wells Park NA	Doreen	McKnight	doreenmcknightnm@gmail.com	1426 7th Street NW		Albuquerque	NM	87102		5056152937	
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West La Cueva NA	Erica	Vasquez	ericamvas@gmail.com	8511 Rancho Del Oro Place NE		Albuquerque	NM	87113		5056817286	
West Mesa NA	Michael	Quintana	westmesa63@gmail.com	301 63rd Street NW		Albuquerque	NM	87105	5059330277		
West Mesa NA	Dee	Silva	ddee4329@aol.com	313 63rd Street NW		Albuquerque	NM	87105	5053627737		

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West Old Town NA	Glen	Effertz	gteffertz@gmail.com	2918 Mountain Road NW	Albuquerque	NM	87104		5059800964	
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West Park NA	Lea	Pino	lea@thecasapino.com	2203 New York Avenue SW	Albuquerque	NM	87104			
Westgate Heights NA	Christopher	Sedillo	navrmc6@aol.com	605 Shire Street SW	Albuquerque	NM	87121	6193155051		
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Winrock South NA	Virginia	Kinney		7110 Constitution Avenue NE	Albuquerque	NM	87110		5053215432	
Yale Village NA	Donald	Love	donallove08@comcast.net	2125 Stanford Drive SE	Albuquerque	NM	87106	5054807175		
Yale Village NA	Kim	Love	klove726@gmail.com	2122 Cornell Drive SE	Albuquerque	NM	87106	5056882162		

The ONC does not have any jurisdiction over any other aspect of your application beyond this neighborhood contact information. We can't answer questions about sign postings, pre-construction meetings, permit status, site plans, buffers, or project plans, so we encourage you to contact the Planning Department at: 505-924-3857 Option #1, e-mail: devhelp@cabq.gov, or visit: <https://www.cabq.gov/planning/online-planning-permitting-applications> with those types of questions.

Please note the following:

- You will need to e-mail each of the listed contacts and let them know that you are applying for an approval from the Planning Department for your project.
- Please use this online link to find the required forms you will need to submit your permit application. <https://www.cabq.gov/planning/urban-design-development/public-notice>.
- The Checklist form you need for notifying neighborhood associations can be found here: https://documents.cabq.gov/planning/online-forms/PublicNotice/CABQ-Official_public_notice_form-2019.pdf.
- The Administrative Decision form you need for notifying neighborhood associations can be found here: <https://documents.cabq.gov/planning/online-forms/PublicNotice/Emailed-Notice-Administrative-Print&Fill.pdf>
- Once you have e-mailed the listed contacts in each neighborhood, you will need to attach a copy of those e-mails AND a copy of this e-mail from the ONC to your application and submit it to the Planning Department for approval.

If your application requires you to offer a neighborhood meeting, you can click on this link to find required forms to use in your e-mail to the neighborhood association(s): <http://www.cabq.gov/planning/urban-design-development/neighborhood-meeting-requirement-in-the-integrated-development-ordinance>

If your application requires a pre-application or pre-construction meeting, please plan on utilizing virtual platforms to the greatest extent possible and adhere to all current Public Health Orders and recommendations. The health and safety of the community is paramount.

If you have questions about what type of notification is required for your particular project or meetings that might be required, please click on the link below to see a table of different types of projects and what notification is required for each: <https://ido.abc-zone.com/integrated-development-ordinance-ido?document=1&outline-names=6-1%20Procedures%20Summary%20Table>

Thank you.



Dalaina L. Carmona

Senior Administrative Assistant
Office of Neighborhood Coordination
Council Services Department
1 Civic Plaza NW, Suite 9087, 9th Floor
Albuquerque, NM 87102
505-768-3334
dcarmona@cabq.gov or QNC@cabq.gov
Website: www.cabq.gov/neighborhoods



Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message.

From: webmaster@cabq.gov <webmaster@cabq.gov>
Sent: Monday, November 7, 2022 10:21 AM
To: Renz-Whitmore, Mikaela J. <mrenz-whitmore@cabq.gov>
Cc: Office of Neighborhood Coordination <onc@cabq.gov>
Subject: Public Notice Inquiry Sheet Submission

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

Public Notice Inquiry For:

Other (please specify in field below)

If you selected "Other" in the question above, please describe what you are seeking a Public Notice Inquiry for below:

City Council - Text Amendment to IDO Citywide

Contact Name

Mikaela Renz-Whitmore

Telephone Number

5059243932

Email Address

mrenz@cabq.gov

Company Name

CABQ Planning Department

Company Address

600 2nd St. NW, 600 2nd St. NW

City

Albuquerque

State

NM

ZIP

87110

Legal description of the subject site for this project:

Citywide request

Physical address of subject site:

600 2nd St. NW

Subject site cross streets:

600 2nd St. NW

Other subject site identifiers:

This site is located on the following zone atlas page:

All properties within CABQ boundaries

Captcha

x

Renz-Whitmore, Mikaela J.

From: Renz-Whitmore, Mikaela J. on behalf of City of Albuquerque Planning Department
Sent: Tuesday, November 8, 2022 1:38 PM
To: City of Albuquerque Planning Department
Cc: Vos, Michael J.; Dolan, Diane R. (ddolan@cabq.gov); Schultz, Shanna M.
Subject: IDO Text Amendments - Citywide - Housing
Attachments: 02-a-CABQ-Official_public_notice_form-2019-EmailMail-IDO-Text-Amendment-Citywide-Housing-CHECKLIST.pdf; 02b-Emailed-Mailed-Notice-PolicyDecisions-Print&Fill-IDO-Citywide-Housing.pdf; O-22-54.pdf

Please see attached materials providing notice that the City of Albuquerque will be submitting an application on November 8, 2022 to amend the [Integrated Development Ordinance \(IDO\)](#) related to proposed amendments for housing from the Mayor's [Housing Forward](#) initiative.

The proposed amendments were introduced by the City Council on November 7, 2022 as an Ordinance ([O-22-54](#)) and referred to the Environmental Planning Commission to be heard on **December 8, 2022 at 8:30 a.m.** via Zoom (details below) in conjunction with the [IDO Annual Update for 2022](#).

- To join online with video: [Zoom Link](#)
- To call in: (301) 715-8592
 - Meeting ID: 226 959 2859

More details about the update, including comment deadlines and hearing information, are available here: <https://abc-zone.com/ido-annual-update-2022>

Best,



MIKAELA RENZ-WHITMORE

(she/hers)

division manager

urban design & development division

o 505.924.3932

m 505.924.3860

e mrenz@cabq.gov

cabq.gov/planning



Mr. Shahab Biazar
City Engineer
Planning Department
City of Albuquerque
600 2nd St. NW
Albuquerque, NM 87102

RE: November 2022 EPC Submittal – Public Mailed Notice Certification
Amendment to Integrated Development Ordinance (IDO) Text – Citywide and Amendment to the
IDO Text – Small Area

Dear Mr. Biazar,

Please accept this letter as certification of Mailed Notice as required by the IDO.

I, Alfredo Ernesto Salas, do hereby certify and attest that I delivered 19 letters to the City of Albuquerque's mail room for first class stamping and delivery to the U.S. Post Office on November 8, 2022.

- Of these, 7 letters were addressed to Neighborhood Association representatives without email addresses on file with the Office of Neighborhood Coordination for the city-wide request as required by IDO Subsection 14-16-6-4(K)(3)(b) and as shown on the attached exhibits.
- An additional 12 letters were addressed to Neighborhood Association representatives whose email addresses on file with the Office of Neighborhood Coordination bounced, so we are sending letters as a courtesy.

Sincerely,

Alfredo Ernesto Salas
EPC Hearing Monitor
Planning Department
600 2nd Street NW, Third Floor
Albuquerque NM 87102

*
Received by *Larry Douglas* Date 11-8-22
DFAS/Purchasing/Office Services (mail room)

Crestview Bluff Neighbors Association
Stephanie Gilbert
908 Alta Vista Court SW
Albuquerque NM 87105

Hoffmantown NA
Pamela Pettit
2710 Los Arboles Place NE
Albuquerque NM 87112

Monte Largo Hills NA
Tom Burkhalter
13104 Summer Place NE
Albuquerque NM 87112

Paradise Hills Civic Association
Tom Anderson
10013 Plunkett Drive NW
Albuquerque NM 87114

Valley Gardens NA
Robert Price
2700 Desert Garden Lane SW
Albuquerque NM 87105

Winrock South NA
John Kinney
7110 Constitution Avenue NE
Albuquerque NM 87110

Winrock South NA
Virginia Kinney
7110 Constitution Avenue NE
Albuquerque NM 87110

Academy Park HOA
William pratt
6753 Kelly Ann Rd NE
Albuquerque NM, 87109

Altura Park NA
Neal Spero
4205 Hannett
Albuquerque NM, 87110

Avalon NA
Joseph Damon
9205 Harbor Road NW
Albuquerque NM, 87121

Barelas NA
Courtney Bell
500 2nd St. #9
Albuquerque NM, 87102

Bear Canyon NA
Brian Stone
5800 La Madera NE
Albuquerque NM, 87109

Citizens Information Committee of
Martineztown C/O Kristi Houde
617 Edith Blvd. NE #8
Albuquerque NM, 87102

La Sala Grande NA Incorporated
Shasta Leonard
3309 La Sala del Este NE
Albuquerque NM, 87111

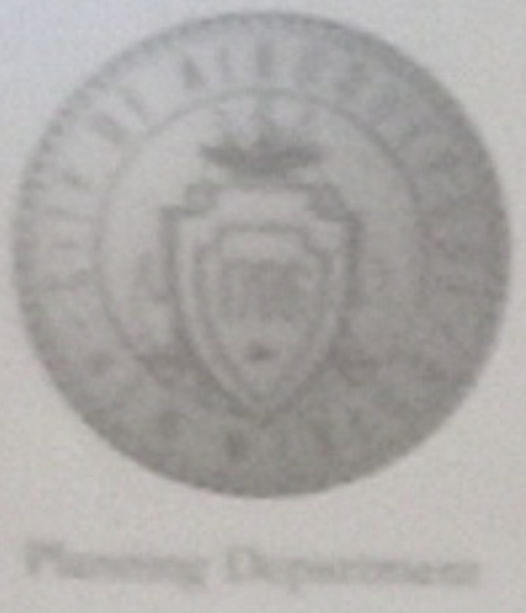
Los Poblanos NA
Don Newman
5723 Guadalupe Trail NW
Albuquerque NM, 87107

Nob Hill NA
Gary Eyster
316 Amherst Drive NE
Albuquerque NM, 87106

Stardust Skies North NA
Tillery Dingler
7727 Hermanson Place NE
Albuquerque NM, 87110

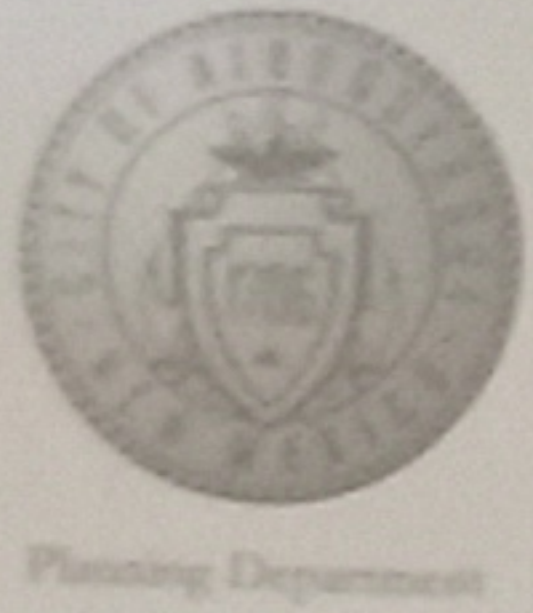
Tuscany NA
Janelle Johnson
PO BOX 6270
Albuquerque NM, 87197

Vista Del Mundo NA
Dennis Roach
13812 Spirit Trail NE
Albuquerque NM, 87112



CITY OF ALBUQUERQUE

Academy Park HOA
William pratt
6753 Kelly Ann Rd NE
Albuquerque NM, 87109



CITY OF ALBUQUERQUE

Barelas NA
Courtney Bell
500 2nd St. #9
Albuquerque NM, 87102



CITY OF ALBUQUERQUE

La Sala Grande NA Incorporated
Shasta Leonard
3309 La Sala del Este NE
Albuquerque NM, 87111



CITY OF ALBUQUERQUE

Stardust Skies North NA
Tillery Dingler
7727 Hermanson Place NE
Albuquerque NM, 87110



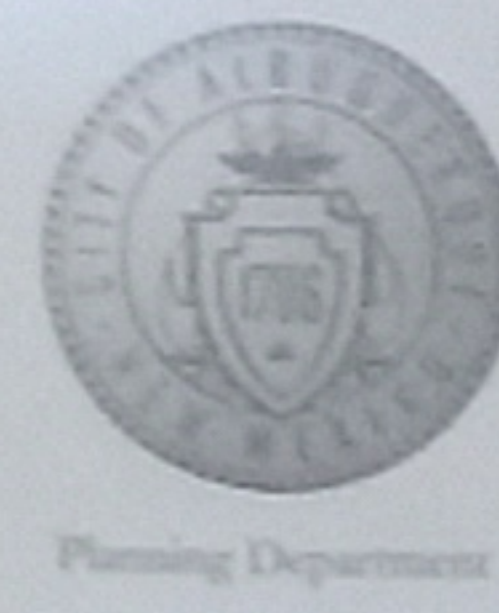
CITY OF ALBUQUERQUE

Citizens Information Committee of
Martineztown C/O Kristi Houde
617 Edith Blvd. NE #8
Albuquerque NM, 87102



CITY OF ALBUQUERQUE

Avalon NA
Joseph Damon
9205 Harbor Road NW
Albuquerque NM, 87121



CITY OF ALBUQUERQUE

Altura Park NA
Neal Spero
4205 Hannett
Albuquerque NM, 87110



CITY OF ALBUQUERQUE

Bear Canyon NA
Brian Stone
5800 La Madera NE
Albuquerque NM, 87109



CITY OF ALBUQUERQUE

Los Poblanos NA
Don Newman
5723 Guadalupe Trail NW
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PO BOX 6270
Albuquerque NM, 87197



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Vista Del Mundo NA
Dennis Roach
13812 Spirit Trail NE
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CITY OF ALBUQUERQUE

Nob Hill NA
Gary Eyster
316 Amherst Drive NE
Albuquerque NM, 87106



Planning Department

CITY OF ALBUQUERQUE

Crestview Bluff Neighbors Association
Stephanie Gilbert
908 Alta Vista Court SW
Albuquerque NM 87105



Planning Department

CITY OF ALBUQUERQUE

Winrock South NA
Virginia Kinney
7110 Constitution Avenue NE
Albuquerque NM 87110



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Paradise Hills Civic Association
Tom Anderson
10013 Plunkett Drive NW
Albuquerque NM 87114



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Valley Gardens NA
Robert Price
2700 Desert Garden Lane SW
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Planning Department

Monte Largo Hills NA
Tom Burkhalter
13104 Summer Place NE
Albuquerque NM 87112



Planning Department

Winrock South NA
John Kinney
7110 Constitution Avenue NE
Albuquerque NM 87110

PUBLIC COMMENTS

From: [Susanne Anderson](#)
To: [City of Albuquerque Planning Department](#)
Subject: Densification of ABQ R1 neighborhoods
Date: Monday, November 21, 2022 2:36:24 PM

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

Dear Mr. MacEachen

I am writing as a concerned owner of a single-family home in Albuquerque's historic neighborhood Spruce Park. The new plans of the City of Albuquerque to increase density in R1 neighborhoods are troubling for a neighborhood like mine, which is located adjacent to the UNM Main campus. Due to its location, many houses are rented to students, owners avoid any investment in the upkeep of the student homes, and the houses deteriorate. Should owners be allowed to add more *casitas* in the backyards, this problem will only intensify, and the neighborhood will be destroyed.

I moved into the neighborhood 20 years ago because of its historic homes and backyards where I felt I could raise my family. This family-friendly neighborhood will be destroyed, should the City allow the break-down of R1 zoning for this area. The city will force ever more families to move into Albuquerque's suburbs and the central neighborhoods of Albuquerque will be primarily for rentals. Please help us to save our historic neighborhood and the family environment we came here to enjoy.

Sincerely,
Susanne Anderson
(Spruce Park Neighborhood)

From: [Colleen Aycock](#)
To: [City of Albuquerque Planning Department](#)
Subject: Please reply to these petitioners to EPC regarding their petition for ordinance change
Date: Tuesday, November 29, 2022 12:02:29 PM

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

Dear Mr. Timothy MacEachen, Chair, EPC

Please find enclosed a request from 258 Albuquerque Citizens to repeal the **IDO Amendment 0-22-10** which allows Motel conversions into permanent long-term residential living units without adequate kitchens in the City's Zoning Code.

On Sept 24, 258 individuals sent these signatures to the Planning Dept. to request a change in the current zoning code. These 258 individuals sent this as a formal request for the City to repeal this IDO amendment because it would cause loss of business to existing hotels and others in business districts and increase crime and necessitate additional security and other costs to them.

These signatures come from business/hotel/restaurant owners, managers, and neighbors of Hotel Cir.

No one at the Planning Dept replied to these signatures and their formal request on Sept 24. Therefore they are requesting that this petition be heard for the record through the EPC.

Please acknowledge that you received this email and that you will be acting upon it accordingly.

Sincerely,

Colleen Aycock

Sent from my iPhone

Handwritten notes on a piece of lined paper, likely a page from a notebook or ledger.

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Handwritten notes on a piece of lined paper, likely a page from a notebook or ledger.

A small, bright yellow sticky note with handwritten text, placed on the bottom middle page.

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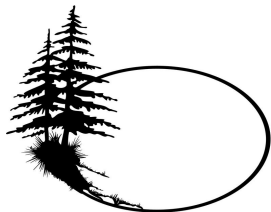
Form with multiple columns and rows, likely a ledger or record book. The text is mostly illegible due to blurring.

Form with multiple columns and rows, likely a ledger or record book. The text is mostly illegible due to blurring.

Form with multiple columns and rows, likely a ledger or record book. The text is mostly illegible due to blurring.

Form with multiple columns and rows, likely a ledger or record book. The text is mostly illegible due to blurring.





Santa Fe Village Neighborhood Association

5601 Bogart Ave. NW Albuquerque, NM 87120
sfvna2014@gmail.com

Date: November 26, 2022

To: Timothy MacEachen
Chair, EPC

From: Jane Baechle
Santa Fe Village Neighborhood Association

Re: 2022 Annual Review of the IDO

The following comments reflect my recommendations to the Santa Fe Village Neighborhood Association (SFVNA) Board regarding selected proposed amendments to the Integrated Development Ordinance (IDO) put forth for consideration during the 2022 Annual Review. Currently, a majority of the SFVNA Board has indicated their support of these positions (6 of 7 Board members; one has not yet responded).

Prior to outlining our positions on specific proposals, I again note that the IDO Annual Review Process continues to be used by City Council and the City administration to make durable and substantial changes in zoning law in a manner that effectively circumvents the goals and policies of the ABC Comp Plan and significantly limits public engagement regarding consequential changes to neighborhood character and quality of life. The first purpose statement of the IDO calls for the IDO to “Implement the adopted Albuquerque/Bernalillo County Comprehensive Plan (ABC Comp Plan), as amended”, 1-3(A). Instead, the IDO Annual Review process is used to alter fundamental goals and policies of the Comp Plan yearly and ignores the Comp Plan’s stated intent to update it every five years through a process of Community Planning Assessments where Albuquerque residents had the opportunity to address their views and priorities.

Specific 2022 Amendment Proposals, SFVNA Position and Rationale

Northwest Mesa Escarpment View Protection Overlay VPO-2

SFVNA Position-*Oppose*

Rationale: The ABC Comp Plan calls for the protection of cultural landscapes. Policy 11.3.4 cites the Petroglyph National Monument as one example with the following Policy Statement, “Petroglyph National Monument: Regulate adjacent development to protect and preserve the

Petroglyph National Monument – its volcanoes, petroglyphs, and Northwest Mesa Escarpment – as a priceless cultural landscape and community resource that provides physical, cultural, and economic benefits.”

Specifically, Policy 11.3.4 calls for the following:

- “Preserve and protect the Monument from growth and development pressures on the West Side”
- “Conserve and protect the Monument and surrounding lands through regulations associated with the Volcano Mesa and Northwest Mesa Escarpment Area” and
- “Protect views to and from the black Escarpment face, which gives physical order to the community and acts as a visual reference point.”

The proposed change to the NW Mesa Escarpment VPO-2 conflicts with every one of these policy statements. It effectively guts the view protection overlay by limiting the applicability of the height restriction sub-area to a sliver of affected properties. Many of these properties are quite large and cover extensive acreage on the mesa. This change would block views across the entire mesa top, views to the east of the mountains and valley and views to the west of the volcanoes which represent a profoundly sacred landscape to Native people and are integral to understanding the cultural significance of the Petroglyph National Monument and the surrounding landscape. While affected properties at the base of the escarpment are largely developed, if approved, this amendment would permit redevelopment that would entirely block views of the escarpment from its base.

Council ordinance O-22-54-SECTION 1. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO ALLOW TWO-FAMILY DWELLINGS PERMISSIVELY IN THE R-1 ZONE DISTRICT CITYWIDE.

SFVNA Position-*Oppose*

Rationale: The ABC Comp Plan again informs our SFVNA position. Santa Fe Village (SFV) is an entirely residential neighborhood of households zoned R-1A, R-1B and R-T. As such, it is in an Area of Consistency, defined by the the Comp Plan as an area “where significant growth is unlikely or *undesirable* and where any new development or redevelopment will need to be consistent with the established character of the surrounding context.” (Italics mine). SFV contains more than 1000 households in an area bounded on the east by Unser Boulevard and otherwise surrounded by the Petroglyph National Monument. It is already a geographically small and densely built neighborhood. This amendment would potentially come close to doubling the number of residences, profoundly changing the character of SFV. As a permissive use, SFV residents and neighborhood association would have no option to engage in the development process, identify harms to SFV or negotiate for changes to mitigate any perceived harms. Clearly, this zoning change represents a highly undesirable change, entirely inconsistent with the established character of SFV.

Finally, SFV is unlikely to be the only low density residential neighborhood profoundly and deleteriously affected by this change. In addition to fundamental changes to neighborhood character, such a significant change makes no provision for consequent increased traffic flow, the need for parking and pedestrian safety on residential streets now carrying significantly increased traffic. If the City of Albuquerque is serious about strategies to provide additional housing units

within established neighborhoods, any proposal should be a conditional use and include stringent development standards which protect neighborhood character and assure adherence to all elements of IDO development standards identified in IDO 14-16-5.

Council Ordinance O-22-54-SECTION 2. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO ALLOW DETACHED ACCESSORY DWELLING UNITS WITH KITCHENS PERMISSIVELY IN THE R-1 ZONE DISTRICT CITYWIDE, EXCEPT IN SMALL AREAS WHERE SPECIAL REGULATIONS APPLY.

SFVNA Position-*Oppose*

Rationale: All of the points cited above that inform our opposition to Section 1 of the proposed ordinance O-22-54 are central to our opposition to the changes that accompany the permissive inclusion of Accessory Dwelling Units (ADUs) with a kitchen in all R-1 zones with a very few notable exceptions in Section 2. These include protection of neighborhood character, assurance of public engagement and assurance of adherence to rigorous design standards.

In addition, the allowed size of ADUs in all R-1 zone districts of 750 ft (with a garage that is not included in the allotted size), reflects no acknowledgement of the size of the lot on which one is planned and its visual and spacial impact on adjacent property. This conflicts with current IDO requirements in Section 5-11(C)(4)(a) which limit ADUs to 25% of the side and rear yards combined.

Council Ordinance O-22-54-SECTION 4. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO ELIMINATE BUILDING HEIGHT MAXIMUMS FOR MULTI-FAMILY RESIDENTIAL DEVELOPMENT AND MIXED-USE DEVELOPMENT.

SFVNA Position-*Oppose*

Rationale-Mixed-use zones are frequently in close proximity to low density residential neighborhoods. Removing height restrictions would profoundly alter the city scape and particularly disadvantage nearby residential areas.

Council Ordinance O-22-54-SECTION 5. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO EXEMPT AFFORDABLE HOUSING FROM OFF-STREET PARKING REQUIREMENTS and SECTION 6. ADD A PARKING REDUCTION FOR MULTI-FAMILY DWELLINGS IN MIXED-USE ZONE DISTRICTS. This parking reduction would reduce required off-street parking for residential housing by 75% of currently required off-street parking.

SFVNA Position-*Oppose*

Rationale-The City provides no evidence that the impact of these reductions would be workable, sustainable or exempt low density, nearby residential areas from becoming the on-street parking default for residents unable to park near their housing. Instead, the City appears to rely on assumptions that those who need affordable housing do not own or need a personal vehicle, that housing developed under these amendments will only be located near accessible public transit, that ABQ public transit is adequate to assure one can reasonably travel to work and activities of daily living and developers and property owners will provide adequate parking for all property under these rules.

IDO Citywide Amendments, Item 26, IDO 5-7(D)(3)(a), **Walls and Fences-Front Yard Wall** Permissively allows front yard walls of 5 ft with the top two feet of view fencing and a setback of at least 2 ft.

SFVNA Position-Oppose

Rationale: Santa Fe Village is a low density residential neighborhood with small to medium lots on curving streets which follow the natural contour of the land. The addition of view fencing on the upper 2 ft of a 5 ft foot wall still impede clear lines of sight, have a deleterious effect on the streetscape and sense of place and limit comfortable walking for 2 people at a time on 4 ft sidewalks. That will be the case with even a 2 ft setback. If individuals desire a taller wall for privacy, containment of children or pets or a perceived belief that this will increase personal safety, any taller wall should be set back a minimum of 5 ft.

Watching a hearing of the ZHE, it is certainly possible to feel sympathy for the administrative burden of hearing multiple permits for a taller wall or variances for a non-conforming wall. Clearly, many ABQ residents are trying to protect their property and homes from unwelcome incursions and are unaware of the IDO regulations or permitting requirements. That is not, however, a reason to enact durable changes in the IDO, particularly changes which have been consistently opposed by residents and neighborhood associations and for which there has been no public comment in support.

In summary, SFVNA opposition outlined here reflects our assessment that these proposals will have deleterious impacts on Santa Fe Village, its residents and homeowners, on the unique and sensitive lands along the escarpment and on the experience of the City, its neighborhoods and cultural landscapes, for ABQ residents and visitors. We respectfully ask the EPC to support the central purpose of the IDO, i.e. to implement the goals and policies of the ABC Comp Plan.

From: [Andy Bardwell](#)
To: [City of Albuquerque Planning Department](#)
Subject: Support for ADU's in IDO revisions
Date: Monday, November 28, 2022 9:01:22 AM

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

Environmental Planning Commissioners,

It is critical for the health of Albuquerque and our community that we provide additional housing units, work towards more density and fuller land utilization. ADU's are an effective step in that direction. To move towards a healthier urban space that supports our community, please consider supporting ADU's in ABQ!

Andy Bardwell

OptiMiser LLC
Andy Bardwell, Ph.D., CEO
Cell: 720-219-3627
andy@optimiserenergy.com
www.OptiMiserEnergy.com



[Introductory Video Online](#)

Health and environmental damages from burning coal are 17-27 cents/kWh per Dr. Paul Epstein, Harvard. <http://thinkprogress.org/climate/2011/02/16/207534/life-cycle-study-coal-harvard-epstein-health/>

From: [PAUL BEATTY](#)
To: [Lehner, Catalina L.](#)
Subject: R-1 status
Date: Wednesday, November 23, 2022 10:39:37 AM

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

Please leave R-1 alone. R-2 is for more than one dwelling on a lot. There are major issues involved with changing R-1. Residents move into R-1 zoned areas so they won't be in a high density area. People need to be able to rely on regulations that were in place when they purchased the property. Thank you, Paul Beatty

From: [R E BEAZLEY](#)
To: [Lehner, Catalina L.](#)
Subject: Tiny homes No
Date: Wednesday, November 23, 2022 6:05:52 AM

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

I wanted to add NO SUPPORT for tiny homes being approved to be built in peoples back yards.

There is presently to much congestion in (87110 zip codes) our neighbor hoods and who will regulate ??

Most people will use these as rentals which increases unknown entities that increase crime and as we know there are not enough police to manage that..

Thank you
Richard E. Beazley
Phone 505-220-5982
1308 Georgia st
Alb NM 87110

From: [marth beckett](#)
To: [City of Albuquerque Planning Department](#)
Subject: ADU support
Date: Sunday, November 27, 2022 8:05:15 PM

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

Dear Commissioners:

Please include this email in 100% support of existing and future ADUs. My support is as an individual who sees the need and positive purposes of existing and future ADUs. In addition, as a member of the Near North Valley Neighborhood Association Board and an active member of our ADU committee, I am working to launch convenings for public input and support of ADUs - existing and future.

Thank you for including my full support as a homeowner and community member to your findings.

Kind regards,

Marth B Beckett
Resident and NNVNA Board Member

From: [Patricia Beene](#)
To: [City of Albuquerque Planning Department](#)
Subject: Amendments to City Zoning Codes
Date: Monday, November 21, 2022 12:51:48 PM

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

Dear Mr. MacEachen,

I understand the housing challenges the City is currently facing and that this issue, if not addressed, will continue to be exacerbated. There are a number of factors for the shortage of affordable housing, probably one of the greatest is price fixing. There is current litigation against Real Page, a software company implicated in price fixing collusion. I believe we need to be honest that greed has been a contributing factor in the increase in rental prices. This is an issue that is currently being addressed by the state legislature and will most likely also be addressed on a federal level.

Throughout the City, properties are vacant, many bank owned. I think it's past time the City addressed the issue of vacant properties. There are a small number of infill lots within older neighborhoods and these could be rezoned to allow more housing density.

The rezoning process has been extremely rushed, one month, and therefore does not allow adequate study and input from City residents. Unfortunately we have seen such a rush to change without citizen input from past administrations, and hopefully this can be avoided with the current administration.

Our City has a diversity of neighborhoods; a one size fits all approach to zoning changes just will not work in Albuquerque. As an example, I live in the Spruce Park neighborhood. Most lots are small compared to newer subdivisions and ADUs will not work with these small lots. The majority of houses have inadequate parking currently and many residents already have to park on the street. This is somewhat of an issue, especially on narrow streets as the flow of traffic is somewhat impeded by parked cars. These are just two issues that readily come to mind while looking at the zoning changes.

I strongly urge the City Zoning Department to consider each neighborhood within the City and involve Neighborhood Associations in the decision making process.

Sincerely,

Patricia Beene
1425 Roma Ave NE 87106

From: [Courtney Bell](#)
To: [City of Albuquerque Planning Department](#)
Subject: Support of Density & ADUs
Date: Monday, November 28, 2022 9:01:44 AM

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

Please note my support of density & ADUs. This is a no-brainer, given the housing crisis we are facing right now. Additionally, Albuquerque has a long history of casitas.

Thanks very much,
Courtney Bell

Courtney Bell
urbancabinproperties@gmail.com
505.929.9397

From: [Leah Black](#)
To: [City of Albuquerque Planning Department](#)
Subject: Upcoming IDO Changes
Date: Monday, November 28, 2022 10:26:29 AM

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

Environmental Planning Commission
City of Albuquerque

Re: Upcoming IDO Changes

To whom it may concern:

As a homeowner, small business owner and real estate investor, I believe allowing higher density developments in the City of Albuquerque is a positive thing for our City and entire State.

I support the IDO changes to allow two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing the kitchen requirements. This seems like a big step towards helping the housing crisis. I believe we all need to contribute to create more housing, but the barriers to do so must be more open and accessible to accomplish that goal.

Please consider supporting these changes.

Sincerely,

Leah Nauman

From: [Erin Blaz](#)
To: [City of Albuquerque Planning Department](#)
Subject: Support for IDO Changes
Date: Monday, November 28, 2022 9:06:11 AM

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

I support IDO changes that allow for more ADUs.
This is necessary for our community to have affordable housing options.

Erin Blaz
707 Morningside Dr SE

From: [David Bouquin](#)
To: [City of Albuquerque Planning Department](#)
Subject: Supportive of increasing density in single-family neighborhoods
Date: Sunday, November 27, 2022 7:19:42 PM

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

I am very supportive of the effort of Mayor Tim Keller seeking “transformative” updates to Albuquerque’s zoning code that could increase density in single-family home neighborhoods and relax some rules on apartment construction – all part of his effort to bolster housing development in New Mexico’s largest city

This makes housing more available, affordable and makes the city more interesting, diverse, better for young families and children, better for biking/transit, all kinds of benefits.

Thank you,
David Bouquin
5500 Poblanos Ct NW, Albuquerque, NM 87107

--

David Bouquin, MPA, PMP
505-690-4426
He/Him

Renz-Whitmore, Mikaela J.

From: Susan Brewster <susancbrewster@yahoo.com>
Sent: Sunday, November 27, 2022 7:17 PM
To: City of Albuquerque Planning Department
Subject: To comment on the proposed City zoning changes

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

This is to express support for Mayor Keller's update to the "Zoning code" (re: Housing supply and access). I believe Albuquerque has the potential to become one of the truly great cities in the world in which a broad range of people desire to live and visit. Our current zoning code, however, is restricting our evolution toward a more flexible and vibrant community. The proposed changes are consistent with basic organic growth concepts great cities of the world have maintained throughout history, changes which positively encourage the development of active transportation options, diversity, and interesting things to do.

In short, as a retiree, I want to live in a city where I can get around easily without a car, has a lot of things to do and interesting people to meet. To achieve this requires population density and transportation options. The proposed changes to the zoning code make the organic development of those much more likely.

Susan Brewster

Sent from my iPad

From: [Susanne Brown](#)
To: [City of Albuquerque Planning Department](#)
Subject: ADUs
Date: Sunday, November 27, 2022 2:25:53 PM

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

Hello,

What an important decision you have to make. ADUs are the only possible way for a livable future for ABQ. Please, vote for ADUs!

ABQ's population is aging and looking for housing on fixed incomes and smaller spaces while we continue to issue building permits for 3 bedroom homes...very poor planning.

NYT today carried a front page article about Baby Boomers and Gen X getting older 36% of US households are now single person! and more and more are on fixed incomes. Where are they to live? This is your opportunity to keep the growing older population in ABQ housed in units they can afford as they downsize.

Please do not let the developers whisper in your ear. We need infill, especially in neighborhoods where it is possible to walk to public transportation and get groceries. I'm 85 and very aware of our city-wide problem with lack of affordable one bedroom housing!

Susanne Brown

From: emailbrowns@aol.com
To: [City of Albuquerque Planning Department](#)
Subject: Against O-22-54
Date: Saturday, November 26, 2022 4:59:49 PM

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

Mr. Timothy MacEachen
Chair of the Environmental Planning Commission

I am strongly opposed to O-22-54. Please do not ruin Albuquerque!

Sincerely,
Heidi Brown

From: [Ethan Brown](#)
To: [City of Albuquerque Planning Department](#)
Subject: Proposed Upcoming IDO Changes
Date: Monday, November 28, 2022 10:13:22 AM

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

To whom it may concern:

As a real estate investor, and a person who recognizes we have an affordable housing crisis, I strongly believe allowing higher density developments in the City of Albuquerque is needed for our City and State.

I support the IDO changes to allow two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing the kitchen requirements.

We desperately need more options to house lower income individuals and families in this city, and these measures will help investors provide them.

Please support these changes.

Sincerely,

Ethan Brown
505-515-8452

From: [Emily Brudenell](#)
To: [City of Albuquerque Planning Department](#)
Subject: please support ADU's
Date: Monday, November 28, 2022 7:02:35 AM

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

Good morning- I'm writing to support changes in the IDO to allow more ADUs. They are an effective way to help diversify housing options in Albuquerque working within existing single family neighborhoods. ADUs provide a great option for all renters but especially for students, families with elderly relatives aging in place, and anyone who wants to have a smaller environmental footprint. They help address the affordable housing shortage, help reduce city sprawl and environmental impact, and allow investment in our existing communities making them stronger and safer.

Thank you

Emily Brudenell
2722 San Joaquin Ave SE
Albuquerque NM 87106
505.818.7012

from my iPad =

From: [Andrew Clouse](#)
To: [City of Albuquerque Planning Department](#)
Subject: In favor of accessory dwelling units
Date: Sunday, November 27, 2022 6:49:10 AM

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

To whom it may concern,

I am writing to express my opinion in favor of accessory dwelling units. It is clear to anyone paying attention that Albuquerque, and the country as a whole, is in the midst of a crisis of affordable housing. I am looking at a reality where it is difficult to affordably house my aging in-laws, and, in the not-too-distant future, my son. An accessory dwelling unit in my own back yard could be the right answer, yet neighborhoods are fighting against them. As long as neighbors are angrily fighting in favor of the status quo, it will be impossible for Albuquerque to build enough affordable housing, resulting in an ever-worsening homelessness problem. It is time to change city policies in favor of accessory dwelling units.

Thanks much,
Andrew Clouse
3508 Smith Ave. SE
87106

Renz-Whitmore, Mikaela J.

From: John Cochran <jrcochr@gmail.com>
Sent: Sunday, November 27, 2022 9:01 PM
To: City of Albuquerque Planning Department
Cc: Peter Swift; Patricia Willson; peter belletto
Subject: Spruce Park Neighborhood Association supports the Inter-Coalition Council's letter of November 21, 2022

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

Dear Chairman MacEachen,

The Spruce Park Neighborhood Association supports the Inter-Coalition Council's letter of November 21, 2022, concerning Text Amendments to IDO – Citywide RZ-2022-00059 and Text Amendments to IDO – Citywide (Housing Forward) RZ-2022-00055.

With My Best Regards,

John Cochran
President,
Spruce Park Neighborhood Association

Renz-Whitmore, Mikaela J.

From: John Cochran <jrcochr@gmail.com>
Sent: Wednesday, November 23, 2022 10:04 PM
To: City of Albuquerque Planning Department
Cc: Peter Swift
Subject: Comments from the Spruce Park Neighborhood Association on portions of O 22-54
Attachments: Spruce Park NA comments on O 22 54 Nov 23 2022.pdf

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

Dear Chairman MacEachen,

On behalf of the Board of the Spruce Park Neighborhood Association, I am writing to express our strong objections to portions of O 22-54. Those objections are detailed in the attached ~ one-page letter.

Our request is that action on O 22-54 be deferred, to then allow due process, to then allow the analysis of other options, and to then allow an analysis of both the positive and the negative consequence of each option.

With My Best Regards,

John Cochran
President
Spruce Park Neighborhood Association



Spruce Park Neighborhood Association
1300 Las Lomas Rd NE
Albuquerque NM 87106

November 23, 2022

Timothy MacEachen, Chairman
Environmental Planning Commission
City of Albuquerque

Dear Chairman MacEachen,

On behalf of the Board of the Spruce Park Neighborhood Association, we are writing to express our strong objections to portions of O 22-54.

For context: our neighborhood is directly across the street from UNM, with University Blvd forming our eastern boundary and Dr. Martin Luther King Jr Ave (MLK) forming our southern boundary. The core of our neighborhood is 100 years old, with newer multifamily housing along MLK. The Spruce Park Neighborhood contains Albuquerque's finest collection of homes from the Roaring 20s, and the majority of our neighborhood is a Historic District that is listed on the State and National Register.

Because our neighborhood is across the street from UNM, we already have a significant number of investor-owned student rentals on lower Maple St, lower Sycamore St, Ash St and the eastern side of Roma Ave. Renting a home to multiple students is legal and most rentals are well-managed, but these homes no longer function as single family homes - rather these homes function as investor-owned commodities.

Over time, our neighborhood has become a fragile island, with high-intensity land-uses at our northern, eastern and western boundaries, and multifamily housing at our southern boundary. We love this neighborhood and we also believe that it is in UNM's best interest to have viable neighborhoods at its boundaries. For this neighborhood to remain viable and family-friendly, the majority of our homes need to be owner-occupied.

If O 22-54 is instituted in the IDO, then investors can purchase single-family homes, modify the homes to become duplexes, and then rent 2 dwelling units. Build an ADU in the backyard and the investor could legally rent 3 dwelling units where there was once a single-family home. Yes, the housing density will increase, but the resulting dwelling units will not be owner-occupied, and the neighborhood will become a so-called student-slum. Recall that the area directly south of UNM was once a thriving, viable residential area.

(1) Due process with public participation and (2) an analysis of options and (3) an analysis of the pros and cons of the options are all hallmarks of good rulemaking – and currently O 22-54 lacks all three. This proposal is being rushed through with little public participation, and there is no analysis of the negative consequences.

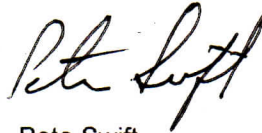
A very viable option that leverages the economics of scale would be for the City to incentivize the construction of a few large-scale, affordable, multifamily housing units. The per-unit costs would be far lower than construction of 1,000 individual backyard apartments / single-family to duplex conversions.

Our request is that the EPC defer action on O 22-54 because O 22-54: (a) is being rushed with little time for public participation, (b) because more homes near UNM will become investor-owned commodities which will have a devastating impact on the Spruce Park Neighborhood, (c) because there is no analysis of other options and (d) because there is no analysis of the spectrum of pros and cons of each option.

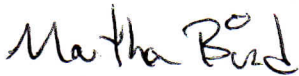
With Our Best Regards,



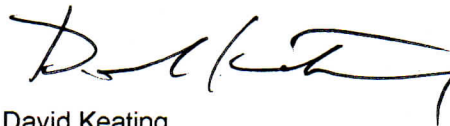
John Cochran
President
Spruce Park Neighborhood Association



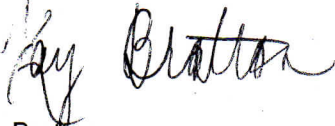
Peter Swift
Vice- President
Spruce Park Neighborhood Association



Martha Bird
Street Rep for Sigma Chi Rd West



David Keating
Street Rep for Ash St



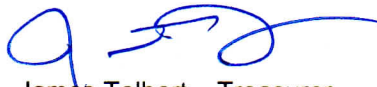
Kay Bratton
Street Rep for Las Lomas Rd East



Allen Parkman
Street Rep for Marquette Pl



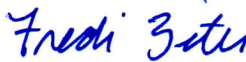
Heidi Brown
Street Rep for Sigma Chi Rd East



James Tolbert – Treasurer
Street Rep for Spruce St



David (Dave) Phillips
Street Rep for Roma Ave, East



Fredi Ziter
Street Rep for Cedar St

Cc: Representative Pat Davis, District 6, CABQ
Representative Gail Chasey
Senator Ortiz y Pino
District 6 Coalition

Renz-Whitmore, Mikaela J.

From: John Cochran <jrcochr@gmail.com>
Sent: Thursday, November 24, 2022 8:59 PM
To: City of Albuquerque Planning Department
Subject: my opposition to making 5-foot tall walls permissive in R-1 zones

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

Dear Chairman MacEachen,

I am writing in opposition to making 5-foot tall walls permissive in R-1 zones because it would cause significant damage to our neighborhoods.

Open front yards and front yards with low walls are essential elements of a walkable, inviting neighborhood. Tall walls in a front yard convey a sense of fear and isolation – as each house must wall off its neighbors and visitors. This remains true even if the top 2 feet are “transparent;” there is still a 5-foot tall wall in the front yard.

Our neighborhood is celebrating its 100th birthday this year and from the very beginning in 1922, open front yards have been an essential element of the character of this historic neighborhood; the Spruce Park Neighborhood, which is a State and National Register-listed historic district.

If people are worried about a pet or young child getting out, they have their entire backyard and they can build a tall wall around their backyard, or they can go through a variance process to (possibly) build a taller wall in the front yard. Let’s retain 3-foot walls in the front yard and keep our neighborhood walkable and inviting.

With My Best Regards,
John Cochran
1300 Las Lomas Rd NE
Albuquerque NM 87106

From: [Debbie-South Los Altos](#)
To: [City of Albuquerque Planning Department](#)
Subject: O-22-54 comments
Date: Sunday, November 27, 2022 4:56:34 PM

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

Sunday, November 27, 2022

Chair Tim MacEachen (via email to abcto@cabq.gov)
Environmental Planning Commission (EPC)
City of Albuquerque

Chair MacEachen:

Below are my comments in regard to O-22-54, primarily Sections 1, 2, and 3. I am also commenting on one of the WHEREAS clauses. Lack of comment on other WHEREAS clauses do not imply support, but rather lack of time to delve into. For the same reason, lack of comments on Sections 4, 5, and 6 should not be construed as support. Sections 7 and 8 appear to be fine. I think something is missing from Section 9 and made a brief comment on that below.

**"11 WHEREAS, the City's zoning powers are established by the City charter, in
12 which: Article I, Incorporation and Powers, allows the City to adopt new
13 regulatory structures and processes to implement the Albuquerque-Bernalillo
14 County Comprehensive Plan ("Comp Plan") and help guide future legislation;
15 Article IX, Environmental Protection, empowers the City to adopt regulations
16 and procedures to protect and preserve environmental features such as water,
17 air and other natural endowments, ensure the proper use and development of
18 land, and promote and maintain an aesthetic and humane urban environment;
19 and Article XVII, Planning, establishes the City Council as the City's ultimate
20 planning and zoning authority; and"**

The above WHEREAS clause, which is taken from page 1, lines 11-20, of O-22-54 states that the City is empowered to adopt procedures to, among other things "promote and maintain an aesthetic and humane urban environment". I say that the City has failed to adopt procedures to maintain an aesthetic and humane urban environment. For decades the City has not enforced zoning codes. The City relies on neighbors reporting neighbors for violations, rather than the City taking proactive measures to patrol the city and cite property owners. This means that a lot of violations are not reported because neighbors either fear or do not want to cause problems for their neighbors. Or, when violations are reported, it can take months or longer for a violation to go before the ZHE. The ZHE then often lets the violation stand or in some cases the ZHE rules that the violation be removed, but then the City Council does not have the will to rule that the property owner remove the violation. Letting zoning violations stand gives others, especially newcomers, the idea that everything they see others have done on their properties are conforming when they are not.

**"16 SECTION 1. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO
17 ALLOW TWO-FAMILY DWELLINGS PERMISSIVELY IN THE R-1 ZONE
18 DISTRICT CITYWIDE."**

**"30 SECTION 2. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO
31 ALLOW DETACHED ACCESSORY DWELLING UNITS WITH KITCHENS
32 PERMISSIVELY IN THE R-1 ZONE DISTRICT CITYWIDE, EXCEPT IN SMALL**

33 AREAS WHERE SPECIAL REGULATIONS APPLY."

I am opposed to SECTION 1 and SECTION 2 to amend the IDO to allow two-family dwellings and ADUs with kitchens permissively in R-1 zones citywide. In order that an amendment like this be considered, the City must first staff up Code Enforcement so that they can look for violations proactively and can respond to reported violations immediately, such as on weekends and after 5 pm. In addition, the City needs to put dollars into Public Service Announcements educating people about permit requirements and zoning ordinances. In many neighborhoods, such as the one I live in, people already build fences, walls, sheds, carports, and in some cases ADUs, on weekends or evenings by themselves or with friends or unlicensed contractors. These things are usually not permitted and, as I noted above, often left to stand in violation. An article in the Albuquerque Journal on November 10 (link here: <https://www.abqjournal.com/2548502/keller-seeks-transformative-changes-to-zoning-code.html>) states "Development anywhere in the R-1 zone remains subject to rules about yard size and setbacks." But I can tell you that the majority of people will only hear "we can build a second dwelling/house/casita in our yard" and they will proceed without taking setbacks and utility easements and other things into account. It will devalue neighboring properties. In addition to setback and easement issues if this amendment goes through, we will also have parking issues. In neighborhoods where the houses were built with single car garages and single car driveways, we already have problems with people violating the restrictions on parking in front yards. Allowing two-family dwellings and ADUs will make this problem worse. The City is not promoting and maintaining an aesthetic environment by allowing current zoning codes to be widely violated. Allowing two-family dwellings and ADUs permissively in the R-1 Zone district citywide will only make things worse because there will be so many more violations to deal with and the City has never been staffed sufficiently to deal with these. I have a friend who lives in another city that is staffed sufficiently to be able to respond to reports of violations immediately, even on evenings and weekends. Not only does this city give substantial fines to property owners who build without permits, but they make them tear down violations. The fines financially support the staff needed for real enforcement. Albuquerque needs to do something like this before we allow two-family dwellings permissively in R-1 citywide. I also want to say that I support the November 21, 2022 letter that the Inter-Coalition Council (ICC) sent to you via email about O-22-54.

"9 SECTION 3. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO 10 EXEMPT ALL CONVERSIONS FROM NON-RESIDENTIAL DEVELOPMENT 11 TO MULTI-FAMILY DWELLINGS FROM THE DEFINITION OF KITCHEN."

I am opposed to SECTION 3 to exempt all conversions from non-residential development to multi-family dwellings from the definition of kitchen. This simply passes what would be upfront full kitchen conversion costs of builders to the residents of those multi-family dwellings in the way of increased food costs because they will not be able to buy and cook healthy food in affordable quantities and will have to purchase and eat prepared foods which are not only unhealthy but expensive. The Albuquerque Journal article of October 15, 2022 (link here: <https://www.abqjournal.com/2540861/exiting-homelessness.html>) is what really brought this to my attention.

"6 SECTION 9. EFFECTIVE DATE AND PUBLICATION OF SECTIONS 1 7 THROUGH 6. Sections 3 through 8 of this ordinance shall take effect after 8 publication by title and general summary upon the sooner of the effective date 9 of the 2022 IDO Annual Update or January 31st, 2024."

SECTION 9 appears to me to be missing the effective date of SECTION 1 and SECTION 2.

Respectfully,
(via email)
Deborah Conger
Albuquerque NM 87123

cell: 505-340-6949

[email: debsla@swcp.com](mailto:debsla@swcp.com)

From: [Gwen Crissman](#)
To: [Lehner, Catalina L.](#)
Subject: Proposed R-1 lot zoning change
Date: Tuesday, November 22, 2022 7:28:41 AM

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

Dear Ms. Lehner:

I am not in favor of the proposed R-1 lot zoning change which would allow secondary dwellings on residential properties originally represented and sold as single family dwelling properties. It is a complete misrepresentation to a neighbor who bought their property in good faith who now must deal with increased vehicle parking, noise level, aesthetics, probably utility issues, and crowding. To go back and re-write an original property law with no regard for the neighbor seems Communistic. Perhaps the solution is to zone new properties to allow for secondary dwellings so people will know on the front end the situation.

Thank you for your consideration.

Gwen Crissman

Sent from my iPad

From: [Cubra Office](#)
To: [Small, Doug](#); [Pierce, Carol M.](#); [City of Albuquerque Planning Department](#); timmac@rio-re.com; [Ilse Biel](#); [Bassan, Brook](#); [Benton, Isaac](#); [Davis, Pat](#); [Jones, Trudy](#); [Pena, Klarissa J.](#); [White, Robert](#); [Ruiz-Angel, Mariela M.](#); [Karen Navarro](#)
Subject: amending the IDO
Date: Thursday, December 1, 2022 7:51:52 AM
Attachments: [Albuquerque Environmental Planning Commission.pdf](#)

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

Chairman MacEachen and Albuquerque Environmental Planning Commission members,

Please accept this public comment regarding amending the IDO.

Respectfully submitted,
Peter Cubra

PETER CUBRA
attorney
Cubra Law Office
4263 Montgomery NE, Suite I-240
Albuquerque, NM 87109
cubraoffice@gmail.com
TELEPHONE: (505) 573-3371

December 1, 2022

VIA EMAIL ONLY

abcto@cabq.gov

Tim MacEachen, Chair

timmac@rio-re.com

David Shaffer, Vice Chair

Joseph Cruz Gary L. Eyster P.E. (Ret.)

Richard Meadows Robert Stetson

Jonathan R. Hollinger Dennis F. Armijo, Sr.

Mrs. Jana Lynne Pfeiffer

Dear Chairman MacEachen and Albuquerque Environmental Planning Commission members:

I am writing, as a long-time advocate for people with disabilities and people who are without housing, to urge the Environmental Planning Commission to approve the mayor's proposed changes to the Integrated Development Ordinance, to enable people of limited financial means to access affordable housing.

I have spent many hours recently visiting with people in Albuquerque who don't have housing, and spent Monday walking among their tents and lean-tos as they cope with the freezing temperatures. The suffering I am observing among those unhoused people is horrific and their suffering is far more important than any complaints by people who, like me, have housing, but are more concerned about the aesthetics of their neighborhood than the survival of our fellow Albuquerque residents.

Please approve all of the mayor's requested modifications to the IDO:

Allow two-family dwellings permissively in the R-1 Zone

Allow detached Accessory Dwelling Units with kitchens permissively in the R-1 Zone.

Exempt all conversions from non-residential development to multi-family dwellings from the definition of kitchen.

Eliminate building height maximums for multi-family residential development and mixed-use development.

Exempt affordable housing from off-street parking requirements.

Add a parking reduction for multifamily dwellings in mixed-use zone districts.

I hope you will prioritize the survival of people without housing. The Golden Rule demands that we act now to preserve the lives and safety of our unhoused neighbors.

Respectfully submitted,

Peter Cubra

Peter Cubra

cc: Douglas Small dougsmall@cabq.gov
Carol Pierce cpierce@cabq.gov

From: [Luke Davis](#)
To: [City of Albuquerque Planning Department](#)
Subject: Duke City ADUs
Date: Saturday, November 26, 2022 2:49:47 PM

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

Dear Planning Commission,

My name is Luke Davis and I have lived in Albuquerque on and off since I was a teenager--more than 25 years. I'm writing to you in support of adding as many ADUs to the IDO as possible. I'm not a housing developer and I currently rent.

It's obvious to everyone here in the Duke City that our housing crisis is now at grossly unsustainable levels. The company I work for is about to start a U.S. headquarters in Albuquerque--largely based on a PESTLE analysis performed a few years ago against several other cities. One of the items that Albuquerque scored fantastic in was the cost of living and comparatively affordable housing. Unfortunately, this is no longer the case and we're tracking housing costs for our soon-to-be-employees carefully.

When looking at California as an example of dealing with a terrible housing squeeze, one of the major efforts to tackle the problem sustainably was by blanketing the State with new ADU laws that encouraged homeowners to play their part. It has been largely successful as one of the tools planners used to bring back affordable housing to municipalities that couldn't house their own workforce due to cost and availability. There are many benefits to allowing homeowners to construct ADUs that benefit the local community of renters and owners alike--while keeping local dollars in the state vs proceeds going to out-of-state developers and investors. Here are some of the benefits:

- ADUs are an **affordable** type of home to construct in New Mexico because they do not require paying for land, major new infrastructure, structured parking, or elevators.
- ADUs can provide a **source of income** for homeowners in Albuquerque instead of rents going to large developers.
- ADUs are typically built with **cost-effective wood frame construction**, which is significantly less costly than homes in new multifamily infill buildings.
- ADUs allow **extended families** to be near one another while maintaining **privacy** which is incredibly important to the multi-generational nature of our culture here in NM.
- ADUs can provide as much **living space** as many newly-built apartments and condominiums, and they're suited well for couples, small families, friends, young people, and seniors.
- ADUs give homeowners the **flexibility** to share independent living areas with family members and others, allowing seniors to age in place as they require more care.

Please carefully consider proposed changes to the IDO that would allow us to sustainably claw-back our ability to offer affordable housing to Albuquerque's growing population by leveraging ADUs throughout the Duke City.

Sincerely,

-Luke Davis

From: [Margie Davis](#)
To: [City of Albuquerque Planning Department](#)
Subject: Housing Forward comments
Date: Monday, November 28, 2022 7:19:31 AM

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

Hello Environmental Planning Commission,

I'm proud of our city for taking on our housing problems and want to thank all of you for your hard work in addressing this. I read through your Housing Forward presentation and, while many details aren't there, it looks like you've addressed the tough issues. There are 2 topics I'd like to comment on.

My first area of concern is Housing Forward's plan to eliminate the building height maximums for multifamily and mixed use development. Our family has owned and operated Sunlight Homes in Albuquerque since the early 1970s. We have built many passive solar homes around Albuquerque and New Mexico as well as passive solar rentals in the UNM area that all rely on solar for heat and day lighting.

Albuquerque's 2018 Integrated Development Ordinance (IDO) includes, among other things, standards for maximum building heights that is intended to ensure continued access to solar energy. The state of New Mexico also has a solar rights law.

I am opposed to Housing Forward eliminating building height maximums without abiding by the IDO and New Mexico's solar rights law.

My other area of concern is in the limiting of short term rentals. **I am in favor of allowing short term rentals to continue in Albuquerque and addressing the housing shortage in the other ways you have proposed.**

Thank you for your attention to these matters.

Sincerely,

Marjorie Davis
9701 Glendale Ave NE ABQ, NM 87122
505-220-2220

From: [Jennifer DePaolo](#)
To: [City of Albuquerque Planning Department](#)
Subject: ADU's as affordable housing
Date: Sunday, November 27, 2022 10:06:02 PM

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

Hello Environmental Planning Commision, please support ADU's as a resource for affordable housing. ABQ rent rates have increased 40% since 2020 and working class families are desperate.

Thank you.

--

Jen DePaolo, she/her
jenndepaolo.com

"Be Joyful, though you've considered all the facts." Wendell Berry

ICC Inter-Coalition Council

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

November 21, 2022

Via email: abcto@cabq.gov
EPC Chair Timothy MacEachen

Re: RZ-2022-00054 – Text Amendments to IDO – Citywide
RZ-2022-00059 – Text Amendments to IDO – Citywide (Housing Forward)
RZ-2022-00055 – Text Amendments to IDO – CPO 9 – North Fourth Street
RZ-2022-00056 – Text Amendments to IDO – VPO-2 – Northwest Mesa

Chairman MacEachen,

The Inter-Coalition Council (ICC) respectfully submits the following comments regarding the above-mentioned cases to be heard by the Environmental Planning Commission on December 8, 2022. This year's review is complicated by the addition of O-22-54, as it includes five major, substantive changes that do not appear on the City's online interactive spreadsheet—thus making it very difficult for community members to respond to those proposed changes.

- RZ-2022-00054 – Text Amendments to IDO – Citywide

The ICC has a dedicated committee of volunteers—we have desperately requested changes to the Annual Update Process, asking for specific source data, examples, beneficiary information, risk analysis, impact statements and summaries of public comment. Those requests notwithstanding, this year we ask that you listen to the comments submitted online. For example, there are currently eleven comments pinned to the Walls & Fences amendment—none of them in favor of this change. This was soundly defeated last year; why are we being forced to review it again?

- RZ-2022-00059 – Text Amendments to IDO – Citywide (Housing Forward)

This ordinance presents 'transformative' changes intended to mitigate the City's housing crisis, as outlined at Housing Forward ABQ <https://www.cabq.gov/family/housing-forward-abq-1>. We have questions about the data and the unintended consequences of these dramatic proposals. The ICC opposes the adoption of these Amendments.

There are discrepancies in numbers from one place to another: the number of housing units needed (broadly identified at various amounts from 13,000 to over 33,000); the number of unhoused households needing PSH (22,000 in one place, 2,200 in another). The referenced Needs Assessment (Appendix 1) presents a thorough and detailed history of disparity amongst different communities; however, much of the graphic data presented is based on a very small survey sample. The Affordable and Supportive Housing Strategies Plan (Appendix 2) seems to be a better path to creating more affordable housing—we all know that developers cannot (or will not) build affordable housing without subsidies.

Every presentation from Planning includes the slide entitled "What is Zoning"; it shows the Constitutional balance between the 5th Amendment: Property Rights and the 14th Amendment: Police Power for public health, safety, and welfare. Whether one has owned a home for a few years or a few generations, there is an expectation of value, of a quality of life, historical and cultural structure of the neighborhood, of a financial contract with the city regarding the zoning of their home. There may be a gentler, more gradual way to transition this change. There is a quote in the Needs Assessment from a community member: ***"You have to move at the speed of trust."***

The City needs to slow down and answer the following questions:

- How many casitas are there in the Small Areas where allowed?
- Where casitas are currently allowed in the city, what percentage are used for family dwellings and what percentage are used for long term rentals?
- What data does the city have on casitas used for long-term rentals regarding affordability?
- What percentage of casitas is used for vacation or short-term rental?
- In the city report “Housing Forward ABQ” the city states “We are working with property owners and community members to determine the most equitable and effective way to limit short-term rentals.” Without a policy in place on short-term rentals, how can the city move forward with plans for changes in R-1? No policy, no enforcement in place. How would the city plan to force current short-term rentals into long term housing rentals?
- What study and analysis has the city done regarding infrastructure impacts created by increased density and its effect on utilities—water, electricity, gas, roads, transportation, traffic, trash and recycling.
- What study and analysis has the city done on the effects of changes in parking in R-1 areas? Narrow streets with additional on-street parking effects on first responders’ access?
- Zoning ordinances are not currently being monitored, inspected and enforced adequately. Will the Planning Department Director and the Mayor certify that zoning is fully staffed to complete inspections, process complaints and issue compliance remedies in a timely way?
- What is the plan for review of current zoning violations and complaint backlog?
- With many zoning violations not being enforced, what review has/is being done of current casitas within the allowed areas for compliance with zoning and what is being done to correct violations?

RZ-2022-00055 – Text Amendments to IDO – CPO 9 – North Fourth Street

The ICC Committee has not yet reviewed this Small Area Amendment.

RZ-2022-00056 – Text Amendments to IDO – VPO-2 – Northwest Mesa

The ICC is in opposition to this Small Area Amendment.

We appreciate the efforts by the Planning Department—the presentations available online are helpful—but it takes time to go through the 84 pages of slides and watch hours of video. We will submit additional comments if time permits.

Sincerely,

Michael Brasher
Inter-Coalition Council President

From: [JULIE DREIKE](#)
To: [City of Albuquerque Planning Department](#)
Cc: [East Gateway Coalition of Associations](#) [East Gateway Coalition of Associations](#)
Subject: Support for--Comments to EPC from the Inter-Coalition Council
Date: Wednesday, November 23, 2022 1:45:29 PM
Attachments: [ICC letter to EPC 11 22 2022.pdf](#)

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

The Embudo Canyon Neighborhood Association (ECNA) Board has received a copy of the memo from the Inter-Coalition Council. We are in support of the concerns raised and positions identified in the memo.

We ask that EPC take these issues into account as they review the amendments.

Julie Dreike
President, ECNA

ICC Inter-Coalition Council

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November 21, 2022

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Sincerely,

Michael Brasher
Inter-Coalition Council President

From: [Theresa Dunn](#)
To: [City of Albuquerque Planning Department](#)
Subject: IDO changes
Date: Monday, November 28, 2022 8:44:55 AM

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

I am writing to express my support for the proposed IDO changes. These changes will make Albuquerque stronger. Eliminating R1 zoning and allowing for denser development will not only help Albuquerque's housing problems, it also has the potential to help with transportation/mobility, air quality, and carbon emissions in Albuquerque. This is a big step forward for Albuquerque. Please adopt the proposed changes.

Thank you,

Theresa Dunn
505-504-8977

From: alanaraeager24@gmail.com
To: [City of Albuquerque Planning Department](#)
Subject: Amendment to the IOD to allow ADOs
Date: Monday, November 28, 2022 7:56:43 AM

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

Affordable housing and reducing the need for new infrastructure have been issues for some time in Albuquerque.

My husband and I have been in our Near North Valley home with RA1 zoning on .9 acres for more than 30 years.

My husband and I wish to continue living here while “aging in place”, in the “big house”, or, more likely, in a casita on our own property. Several of our neighbors have ADOs most of which are, I assume, grandfathered additions.

I’d previously looked into the zoning restrictions that didn’t allow us to make this happen. We would very much like the ADO option be a viable possibility.

Thank you,
Alana Eager

Sent from my iPad=

From: [Leslie Elgood](#)
To: [City of Albuquerque Planning Department](#)
Subject: Public comment on proposed zoning O-22-54
Date: Monday, November 21, 2022 11:18:03 AM

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

Dear Chairman MacEachen:

As a Spruce Park resident I strongly oppose these suggested changes. While I recognize that the city has a city-wide housing shortage, particularly in the rental market, long-time home owners also need their needs to be considered.

Rentals in Spruce Park already have many unfortunate consequences in Spruce Park especially with our neighborhood so close to UNM/CNM. We are already afflicted with weekend parties - loud in the night, disruptive parking, trash all over not just the rentals yards but in neighbors yards as well as up and down our streets (red plastic beer cups, beer and liquor bottles - you get the "picture" . Last year, a student renter in Spruce Park drove down our streets shooting his gun into the air.

The situation has gotten so bad on ROMA NE between University and Sycamore that long-time residents are moving. This destroys the underpinnings of what a "neighborhood" is and why people want to move here. The city's incentives for investors to convert single family homes in the neighborhood to rentals will be powerful and irreversible. And if passed will make an already unfortunate problem even worse.

I strongly strongly oppose the proposed ordinance.

Leslie Elgood
Senior Strategist
Cota Holdings, LLC
(505) 366-3008

From: [Elizabeth Elia](#)
To: [City of Albuquerque Planning Department](#)
Cc: [Allison Freedman](#); [Rachel Biggs](#); [Serge Martinez](#)
Subject: Suggestion for IDO Annual Update 2022
Date: Monday, November 28, 2022 8:12:40 AM
Attachments: [O.22.54 Comments.docx](#)

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

Dear Office of Planning,

Attached, please find comments to O-22-54 submitted by Rachel Biggs, Chief Strategy Officer at Albuquerque Healthcare for the Homeless and Professors Allison Freedman, Serge Martinez and Elizabeth Elia from UNM School of Law. We hope that you will be able to discuss these at today's EPC meeting.

Thank you,

Elizabeth

Elizabeth Elia

Associate Professor

University of New Mexico School of Law

1117 Stanford NE

Albuquerque, NM 87106

(o) 505-277-0677

View my [scholarship](#).

View my [bio](#).

Please accept these comments to O-22-54 submitted by Elizabeth Elia, Associate Professor at UNM School of Law, Allison Freedman, Assistant Professor at UNM School of Law, Serge Martinez, Professor at UNM School of Law, and Rachel Biggs, Chief Strategy Officer at Albuquerque Health Care for the Homeless.

First, we would like to commend Mayor Keller and the City Council for the goals expressed in O-22-54. The intention in the bill is to reduce barriers and incentivize the development and conversion of housing units throughout the city to increase the city's housing supply. These goals show not only an awareness of increasing shortages of housing and increases in housing costs for Burqueños, but also a commitment to using zoning as a tool to fix these problems.

These goals are laudable, and the specific provisions of the IDO marshalled to address them are well-selected. However, we suggest several revisions what we think will maximize the zoning code as a tool for incentivizing housing development without inadvertently undermining other objectives expressed in the Comprehensive Plan. For clarity, our comments are listed in sequential order.

We strongly support Section 1, which would allow two-family dwellings as-of-right in all R-1 zones, and Section 2, which would allow detached accessory dwellings with kitchens as-of-right in most R-1 zones. Allowing for two-family dwellings and casitas in R-1 zones has been implemented in several other jurisdictions as a method of increasing housing supply throughout a city without materially affecting the character of a residential neighborhood.¹ Other documented benefits, in addition to increasing housing supply, include making it more possible for aging residents to age-in-place, more options for multi-generational living arrangements, and greater opportunities for homeowners to supplement their incomes. We stress that these revisions to R-1 zones have been implemented in other cities and have not materially affected the character of those R-1 neighborhoods. Our only suggestion about Section 1 is to make clear in Section 14-16-4-3(B)(5)(a) that two-family detached dwellings are permitted as-of-right in R-1 zones regardless of whether they are on one or two lots:

14-16-4-3(B)(5)(a) Where this use is allowed and the 2 dwelling units are on the same lot or separate lots, interior side setbacks required by the zone district shall not apply to any lot line where the 2 units share a common wall.

We strongly support Section 3, which exempts all conversions from non-residential development in mixed-use zones to multi-family dwellings from the definition of kitchen. The conversion of under-used hotel, office, and retail space in our city to housing is good for property owners, good for residents and good for the city. It holds the promise of reducing costs for policing vacant and abandoned properties. Converting these spaces into residential units with the proposed definition of "kitchen" will enable conversions to be significantly more affordable and yet still provide quality, permanent housing options for people who have experienced homelessness and people at risk of becoming homeless. We note that

¹California, Oregon, Minneapolis, and Charlotte, NC have all passed laws allowing duplexes in single-family zones. See CA SB9, information available at <https://focus.senate.ca.gov/sb9>; OR House Bill 2001, information available at <https://www.opb.org/news/article/oregon-single-family-zoning-law-effect-developers/>; Minneapolis information available at <https://www2.minneapolismn.gov/business-services/licenses-permits-inspections/construction-permits-certificates/building-requirements/dwelling-conversions/single-family-dwelling-conversion/>; Charlotte, NC information available at <https://www.wbtv.com/2022/08/22/charlotte-city-council-scheduled-vote-unified-development-ordinance/>; For information about California's ADU statute, see California's ADU Handbook, available at https://www.hcd.ca.gov/policy-research/docs/adu_december_2020_handbook.pdf.

the prior version of this exemption tied the exemption to the creation of affordable housing funded by the Department of Families and Communities and capped the maximum number of conversion units to 100 in any development. By removing the unit cap and public funding requirement, this amendment removes one of the leverage points currently contained in the IDO to incentivize private owners' creation of affordable housing. This loss of bargaining power to incentivize affordable housing development is undesirable. Therefore, we suggest amending this provision to retain an incentive based on the provision of affordable housing. For example, as-of-right conversions could be capped at 100 units per development, with a bonus of 1 additional unit for every unit either funded by the Department of Family and Community Services, or otherwise reserved for low-income tenants. For example, a developer might convert 100 units as-of-right, create an additional 25 units of affordable housing financed by the Department of Family and Community Services, and receive another 25 unrestricted units for a total of 150 units.

We support Section 4, which would eliminate building height maximums for multi-family residential and mixed-use development to the extent that it frees housing developers from restraints on maximizing density in zones where density is envisioned by the Comprehensive Plan. However, we note that removing all height restrictions is of minimal value to housing developers in Albuquerque given the market constraints on steel construction. Also, we note that as in the conversion amendment noted above, this amendment would destroy a point of leverage currently contained in the IDO that incentivizes private development of affordable housing. To avoid this result while freeing housing developers to pursue maximum density where appropriate, we suggest a moderate across-the-board increase in height limits in R-MF and Mixed-Use zones, with bonus height increases tied to commitments to create workforce or affordable housing. Additionally, as written, this height increase would allow for decentralizing density away from the centers and corridors designed in the Comprehensive Plan to absorb higher densities. To prevent this undesirable result, we suggest maintaining a difference in height limits as-of-right between the centers and corridors designated in the IDO and areas outside of these designated centers and corridors.

We support Section 5, which would exempt developments containing at least 20% of units to households at or below 50% of Area Median Income for its potential to reduce the cost of developing affordable housing.

We support Section 6, which reduces off-street parking requirements for multi-family dwellings in mixed-use zones by 75 percent to the extent that its goal is to reduce the cost of developing housing. However, we are concerned that this amendment will inadvertently push housing development to areas remote from the centers and corridors intended by the Comprehensive Plan to absorb such density. Therefore, we suggest a stepped approach to the parking exemption ranging from 100% - 50% depending on a project's proximity to quality alternative transportation options. The current IDO creates parking requirement reductions based, in part, on whether a project is located within a quarter mile of a transit station. An effective amendment might increase exemptions based on proximity to quality transit stations. For example, a development might be eligible for a 50% parking reduction if located within a quarter mile of a transit stop or station with a peak service rate of 15 minutes or better, a 75% parking reduction if located within a quarter mile of transit stop or station with a peak service rate of 10 minutes or better, and a 100% parking reduction if located within a quarter mile of a transit stop or station with a peak service rate of 5 minutes or better.

As mentioned at the beginning of our comments, we strongly support the overarching goals of these amendments. They clearly are intended to remove regulatory barriers to encourage the development of housing in a broad range of zones and at various price points. We see this as a step in the right direction in addressing the critical and growing shortage of housing in Albuquerque, especially affordable housing. We recognize and commend the City's Planning Department for its deep passion and expertise crafting nuanced and effective zoning ordinances. We hope that the Planning Department will be given the opportunity to revise the sections of O-22-54 that we discussed above to add greater nuance in a way that most effectively pursues the goal of spurring private and affordable housing development in conformity with the Comprehensive Plan.

Thank you for the opportunity to comment. We are available to discuss these comments further.

Please accept these comments to O-22-54 submitted by Elizabeth Elia, Associate Professor at UNM School of Law, Allison Freedman, Assistant Professor at UNM School of Law, Serge Martinez, Professor at UNM School of Law, and Rachel Biggs, Chief Strategy Officer at Albuquerque Health Care for the Homeless.

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These goals are laudable, and the specific provisions of the IDO marshalled to address them are well-selected. However, we suggest several revisions what we think will maximize the zoning code as a tool for incentivizing housing development without inadvertently undermining other objectives expressed in the Comprehensive Plan. For clarity, our comments are listed in sequential order.

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¹California, Oregon, Minneapolis, and Charlotte, NC have all passed laws allowing duplexes in single-family zones. See CA SB9, information available at <https://focus.senate.ca.gov/sb9>; OR House Bill 2001, information available at <https://www.opb.org/news/article/oregon-single-family-zoning-law-effect-developers/>; Minneapolis information available at <https://www2.minneapolismn.gov/business-services/licenses-permits-inspections/construction-permits-certificates/building-requirements/dwelling-conversions/single-family-dwelling-conversion/>; Charlotte, NC information available at <https://www.wbtv.com/2022/08/22/charlotte-city-council-scheduled-vote-unified-development-ordinance/>; For information about California's ADU statute, see California's ADU Handbook, available at https://www.hcd.ca.gov/policy-research/docs/adu_december_2020_handbook.pdf.

the prior version of this exemption tied the exemption to the creation of affordable housing funded by the Department of Families and Communities and capped the maximum number of conversion units to 100 in any development. By removing the unit cap and public funding requirement, this amendment removes one of the leverage points currently contained in the IDO to incentivize private owners' creation of affordable housing. This loss of bargaining power to incentivize affordable housing development is undesirable. Therefore, we suggest amending this provision to retain an incentive based on the provision of affordable housing. For example, as-of-right conversions could be capped at 100 units per development, with a bonus of 1 additional unit for every unit either funded by the Department of Family and Community Services, or otherwise reserved for low-income tenants. For example, a developer might convert 100 units as-of-right, create an additional 25 units of affordable housing financed by the Department of Family and Community Services, and receive another 25 unrestricted units for a total of 150 units.

We support Section 4, which would eliminate building height maximums for multi-family residential and mixed-use development to the extent that it frees housing developers from restraints on maximizing density in zones where density is envisioned by the Comprehensive Plan. However, we note that removing all height restrictions is of minimal value to housing developers in Albuquerque given the market constraints on steel construction. Also, we note that as in the conversion amendment noted above, this amendment would destroy a point of leverage currently contained in the IDO that incentivizes private development of affordable housing. To avoid this result while freeing housing developers to pursue maximum density where appropriate, we suggest a moderate across-the-board increase in height limits in R-MF and Mixed-Use zones, with bonus height increases tied to commitments to create workforce or affordable housing. Additionally, as written, this height increase would allow for decentralizing density away from the centers and corridors designed in the Comprehensive Plan to absorb higher densities. To prevent this undesirable result, we suggest maintaining a difference in height limits as-of-right between the centers and corridors designated in the IDO and areas outside of these designated centers and corridors.

We support Section 5, which would exempt developments containing at least 20% of units to households at or below 50% of Area Median Income for its potential to reduce the cost of developing affordable housing.

We support Section 6, which reduces off-street parking requirements for multi-family dwellings in mixed-use zones by 75 percent to the extent that its goal is to reduce the cost of developing housing. However, we are concerned that this amendment will inadvertently push housing development to areas remote from the centers and corridors intended by the Comprehensive Plan to absorb such density. Therefore, we suggest a stepped approach to the parking exemption ranging from 100% - 50% depending on a project's proximity to quality alternative transportation options. The current IDO creates parking requirement reductions based, in part, on whether a project is located within a quarter mile of a transit station. An effective amendment might increase exemptions based on proximity to quality transit stations. For example, a development might be eligible for a 50% parking reduction if located within a quarter mile of a transit stop or station with a peak service rate of 15 minutes or better, a 75% parking reduction if located within a quarter mile of transit stop or station with a peak service rate of 10 minutes or better, and a 100% parking reduction if located within a quarter mile of a transit stop or station with a peak service rate of 5 minutes or better.

As mentioned at the beginning of our comments, we strongly support the overarching goals of these amendments. They clearly are intended to remove regulatory barriers to encourage the development of housing in a broad range of zones and at various price points. We see this as a step in the right direction in addressing the critical and growing shortage of housing in Albuquerque, especially affordable housing. We recognize and commend the City's Planning Department for its deep passion and expertise crafting nuanced and effective zoning ordinances. We hope that the Planning Department will be given the opportunity to revise the sections of O-22-54 that we discussed above to add greater nuance in a way that most effectively pursues the goal of spurring private and affordable housing development in conformity with the Comprehensive Plan.

Thank you for the opportunity to comment. We are available to discuss these comments further.

From: [Carrie Ellen](#)
To: [City of Albuquerque Planning Department](#)
Subject: Please Support O-22-54 - Carrie Gordon
Date: Tuesday, November 29, 2022 4:44:23 PM

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

Hello. I am writing to send my letter of support for the changes outlined in O-22-54 to our IDO that would allow for duplexes on R-1 lots, allow for accessory dwelling units on R-1 lots, exempting non-residential conversions from the definition of a kitchen, and loosen the parking requirements for affordable and middle-level housing developments.

As a residential resale Realtor, I have seen the impacts of a housing shortage firsthand. I think it's time we take this crisis seriously and allow for this expansion our Albuquerque community members desperately need.

I appreciate your careful consideration.
Thank You



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From: [Ron Faich](#)
To: [Lehner, Catalina L.](#)
Subject: Change in R-1 zoning for casitas
Date: Monday, November 21, 2022 11:40:32 PM

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

Ms.Lerner:

I have lived in the Indian School/Moon area of Albuquerque for the past 33 years, and I am deeply opposed to the proposed change in the zoning ordinances to allow second homes or casitas in the backyards of lots now restricted to single-family homes. Given the escalating costs of home construction currently, it is unlikely new casitas will be affordable for low income and many mid-income persons and families. This would negate the argument that the proposed zoning change would address the need for additional housing stock throughout the city. Furthermore, adding population density in middle Northeast Heights neighborhoods will lead to deleterious side effects, such as litter, traffic, crime and an overall decline in neighborhood quality of life. But, our property taxes will continue to increase, of course. The proposed zoning change may have appeal with a short range view, but a longer view seems fraught with problems.

Please convey my opposition to the EPC and other decision-making authorities. Thank you.

Ron Faich
9400 SnowHeights Bl NE
Albuquerque 87112

Sent from my iPad

From: [PETER J FEIBELMAN](#)
To: [Mayor Keller](#)
Cc: [Foran, Sean M.](#); [Benton, Isaac](#); [City of Albuquerque Planning Department](#); [SPNA President John Cochran](#)
Subject: Proposed changes to the IDO
Date: Wednesday, November 23, 2022 9:24:16 PM

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

23 November 2022

Dear Mayor Keller,

Albuquerque has an unfortunate history of destroying its architectural heritage in the name of progress, and your proposed changes to our IDO amount to a continuation of that history. The Spruce Park neighborhood, where I've lived for half a century, is generally acknowledged to be one of the most appealing in town. Lots of folks – maybe even you – come here just to take a walk. Many homes in the neighborhood are one-of-a-kind. Many date back to the 1920's and 1930's.

Well, that's the good news. The bad is that Spruce Park is an urban island surrounded by behemoths, notably the UNM campus, the ever-expanding UNM hospital and Presbyterian. The result is relentless pressure to replace the neighborhood's lovely homes with nondescript, multi-unit structures, and to fill our yards with Auxiliary Dwelling Units. Narrowly, this makes economic sense, particularly in a time of high housing costs. In the big picture, however, it does not. If the city won't protect its heritage in neighborhoods like Spruce Park, the Country Club area, and along Ridgecrest, then Albuquerque becomes just another Anytown, USA.

That's certainly not what I want. Do you?

Sincerely,
Peter Feibelman
1401 Sigma Chi Rd NE
Albuquerque, NM 87106
Ph: (505)242-1946

Cc: Councilor Pat Davis
Councilor Isaac Benton
EPC Chair Timothy MacEachen
SPNA President John Cochran

From: [Evelyn Feltner](#)
To: [City of Albuquerque Planning Department](#)
Subject: suggestions re R-1
Date: Wednesday, November 23, 2022 11:22:11 AM

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

Hi Planning Staff,

I understand this is the address to send suggestions concerning the proposal to change R-1 rules to allow second dwellings on those properties.

Here are some:

1. SLOW DOWN, there is no reason to fast-track this proposal, which is about construction permission that would take months to implement. Wait till 2023 so the public can be informed about the proposal's contents and meeting dates—there has been no publicity about the special Dec. 8 meeting.
2. Check on what having two dwellings on one property, especially if the new one is a rental, would mean in terms of insurance. My State Farm Insurance said it is extremely likely that two policies would be needed—one for the main dwelling and a rental-policy for the second house.
3. Explore and let the public know how such a proposal has worked if implemented in other cities—did it bring down rent prices, did it ease what the city administration is calling a shortage of affordable rentals?
4. Check for other solutions—it is my understanding that Indiana renters can take some rental costs off their state income taxes, perhaps similarly inventive solutions have been put in place elsewhere.
5. Limit any little houses to lots of $\frac{3}{4}$ an acre or more; given current fire safety regulations about structures' space from walls and homes, such dwellings could not be built in the majority of R-1 properties in ABQ.

Evelyn Feltner

Inez Neighborhood Association board member and past president

current delegate from INA to the District 7 Coalition of Neighborhood Associations

From: [Evelyn Feltner](#)
To: [Lehner, Catalina L.](#)
Subject: About R-1 change proposed
Date: Monday, November 21, 2022 6:47:20 PM

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

This is meant as a comment on the proposed change in the IDO to allow possibility of more than one dwelling on an R-1 lot. Evelyn Feltner, 2014 Utah St. NE, ABQ 87110

Hello EPC Commissioners,

Please read and consider the points made below before supporting the announced attempt to revive the little-house-in-backyard issue.

Reasons to let it alone and look into other solutions:

1. The zoning designations are a form of contract between the city and real estate buyers and residents. Buyers rely on the designation of R-1 getting them an area of single-family houses, one to a lot. Residents rely on this designation being a permanent one. Making this drastic change to allow potentially two houses on a lot is violating that contract. There would also have to be a change in the setback rules relating to walls and property lines unless these little houses are permitted only on lots of three-quarters of an acre more. They just won't fit in the back or side yards of the majority of R-1 lots in the 68% of lots labeled in R-1 in the city, according to news stories.
2. Having little houses in backyards won't accomplish anything helpful to the unaffordable rents problem. To build one of these structures to code, which I assume would still apply, could easily run \$80k. The builder is going to want that money back in rent. If the little house was rented for the affordable price of \$500 a month, it would take 13 and 1/3 years to recover the building cost. If rented at \$1200 a month, it would take 5 and 1/2 years, and \$1200 is close to current monthly rent for one-bedroom apartments. Most who build these will do the math.
3. Conditional use requests for little houses in back or side yards will need approval from the zoning hearing examiner and are certain to be fought by a number of residents and neighborhood associations. (I assume there isn't an attempt to make them permissive uses, as that would simply wipe out R-1 as a zone.) This places an enormous burden as to time and legal preparation on such associations, which are made up of volunteers. Yet they will have to aid residents

with these objections unless the associations want to stand by while only those who can afford lawyers proceed with objections. Decisions in those hearings can be appealed, and that would mean even more time and legal preparation.

I am sympathetic to working people and people on fixed incomes who suddenly find they can't afford rents in Albuquerque. But the problem could lessen when supply of apartments, stalled by the pandemic, catches up with demand. Or it could be lessened by these better answers than altering the zoning code's promise to R-1 residents.

There was a financial question on the recent election's ballot about money for public housing; that's one answer. I understand from relatives who live in Indiana that it is possible for renters there to deduct rent costs from their state income taxes; other states may have equally inventive solutions. The state legislature is responsible for not allowing rent subsidies; Albuquerque surely has a strong presence there for changing that. There is no reason not to try making efforts to achieve these less drastic remedies before making a change that will impact R-1 homeowners for years.

Evelyn Feltner, former president of Inez Neighborhood Association and former secretary of the District 7 Coalition of Neighborhood Associations and current Inez Neighborhood delegate to the D7 Coalition

From: [jf](#)
To: [City of Albuquerque Planning Department](#)
Cc: [JULIE DREIKE](#); [Chavez, Aziza](#); [Miller, Rachel R.](#); [Renee Grout](#); [Jones, Trudy](#)
Subject: IDO Annual Update
Date: Wednesday, November 30, 2022 7:55:19 PM

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

Dear Chairman MacEachen:

The Cibola Neighborhood Association strongly supports the comments submitted by the Inter-Coalition Council (ICC) and calls on the EPC to carefully consider and respond to the well-considered questions posed by the Council. We would also like to add the following thoughts:

We support the City's goal of expanding the inventory of lower cost housing in Albuquerque. However, we do not believe that changing the zoning from R-1 would be an effective or appropriate means of doing so.

First, we are aware of no evidence to suggest that a change in zoning laws would induce developers or builders to build low cost multi-family housing. To the contrary, such a change is more likely to accelerate the trend of converting homes into vacation/short term rentals.

While some homeowners have responsibly rented out their homes for short periods in which they are away, others –many of the absentee– find short-term rentals to be more profitable than selling to a new family renting or leasing long term. This has eliminated many lower end rentals and homes.

At least three of the Airbnb apartments on Palo Verde Dr., NE, which used to rent for \$600-800/month now reportedly

fetch more than \$100/night for short-term lodging. One neighbor is even renting her garage, with a windowless separate bedroom, bath and a pop-up kitchen, for more than \$100/night, using a fictitious "Owner/Superhost." This is happening all over Albuquerque.

At the same time, many arterial roads, such as Menaul, Candeleria and Juan Tabo are now plagued with vacant lots, former shopping centers, and office buildings. Development of these resources would seem much more likely to alleviate the housing shortage, and we urge the EPC and City Council to work with appropriate County and State officials to facilitate such investment and development.

Finally, we are dismayed by the argument that R-1 zoning should be eliminated because people are already crowding multiple families crowding into single family dwellings despite the zoning laws. That rationale could be used to legitimize all manner of illegal activities. Should we eliminate speed restrictions because many people ignore them? Enforcement of sound regulations, rather than acquiescence to violators is needed and would make ABQ a more pleasant and productive city.

On behalf of the Cibola Neighborhood Association,
Joseph Freedman, President

From: [Jennifer Gibbs](#)
To: [City of Albuquerque Planning Department](#)
Subject: EPC letter of support IDO changes
Date: Sunday, November 27, 2022 7:29:08 PM
Attachments: [EPC letter of support 11.27.22.pdf](#)

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

Attached is my letter of support for the IDO changes.

Thank you,

Jennifer

--

Jennifer Gibbs, MHA, FACHE
Elevate Cohesion, LLC
505-238-9108



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Environmental Planning Commission
City of Albuquerque

Re: Upcoming IDO Changes

To whom it may concern:

As a business owner and real estate investor, I believe allowing higher density developments in the City of Albuquerque is a positive thing for our City and State.

I support the IDO changes to allow two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing the kitchen requirements.

Please consider supporting these changes.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Dill". The signature is fluid and cursive, with the first name "Jennifer" and last name "Dill" clearly distinguishable. Below the signature is a solid horizontal line.

From: [Joshua Gingerich](#)
To: [City of Albuquerque Planning Department](#)
Subject: ADU's
Date: Sunday, November 27, 2022 8:59:10 PM

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

Attn: Environmental Planning Commission

My name is Joshua Gingerich, I am a citizen and a property owner in Albuquerque. I am writing to express my support for Accessory Dwelling Units. I am a Licensed Clinical Social Worker that has worked primarily with low income and unstably housed members of the community. My wife is an elementary public school teacher who observes housing instability with a large number of her vulnerable students and families. As a public servant that votes and pays taxes, I want to implore you to consider any and all affordable housing options that your commission can extend; including but not limited to ADU's. As a community we need to expand the available housing that would allow for legal and inspected alternatives that ADU's can provide especially for low income people. ADU's can also provide options for elderly family members who may need to move in with their caregivers or provide a living space for a live-in caretaker allowing for elderly to stay out of assisted living/nursing homes and ultimately saving taxpayers money that is usually paid out in the form of institutional medicaid. Lastly, by expanding this we can and should crack down on dilapidated and illegal/sub par housing that takes advantage of the most vulnerable in our community. Housing is a basic need in our community and Albuquerque is lacking this vital resource.

Thank you for your consideration

Respectfully,
Joshua Gingerich MSW, LCSW
87110

From: [Lisa Goetz](#)
To: [City of Albuquerque Planning Department](#)
Subject: Re: [EGCoA] IDO comments for the EPC
Date: Sunday, November 27, 2022 1:35:00 PM

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

It seems like the city is rushing this change through with out fully researching or discussing all the implications.

My comments are:

One item that was not touched upon is construction of multiple multi story townhomes on a subdivided lot. Although there is a base square footage restriction of 750 sq ft, there is no height restriction. There is nothing in the proposed document that mentions how the city would handle someone buying a single home lot and either tearing down the existing home and putting in townhomes (as has happened in Seattle and Austin) or subdividing a single lot so that four structures or more can be built.

Respectfully,

Lisa Goetz

802 Martingale LN SE

Albuquerque , NM 87123

Sent from [Mail](#) for Windows

From: [Sean Gover](#)
To: [City of Albuquerque Planning Department](#)
Subject: Proposed IDO Changes
Date: Monday, November 28, 2022 9:49:24 AM
Attachments: [IDO Changes support.docx](#)

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

To Whom it may concern.

Attached is my support for the IDO changes currently being discussed.

From: [Maria Griego](#)
To: [City of Albuquerque Planning Department](#)
Subject: City of Albuquerque Zoning Changes O-22-54
Date: Wednesday, November 30, 2022 2:19:40 PM
Attachments: [Comments to CABQ-O-22-54 11-30-22.docx.pdf](#)

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

Hello,

Please find attached comments from the New Mexico Center on Law and Poverty regarding the City of Albuquerque Zoning Changes O-22-54.

Thank you,

Maria Griego
she/her/ella
Director of Economic Equity - Attorney
Ph: (505) 302-2628

301 Edith Blvd NE

Albuquerque, NM 87102



301 Edith Blvd NE C
Albuquerque, NM 87102
(505) 255-2840
nmpovertylaw.org

November 30, 2022

Albuquerque City Council
Environmental Planning Commission
RE: City of Albuquerque Zoning Changes O-22-54
Via email to: abcto@cabq.gov

Dear Albuquerque City Council Environmental Planning Commission,

Please accept these comments on Council Bill O-22-54 submitted by the New Mexico Center on Law and Poverty.

The Center on Law and Poverty (the Center) recognizes that this bill is intended to reduce barriers to housing and incentivize the development of new units to increase the city's housing supply. These steps are crucial given the unprecedented housing crisis currently plaguing the City of Albuquerque. With ever increasing numbers of unsheltered and housing insecure Burquenos and rapidly rising rents, the City must take swift solution-oriented action to increase Albuquerque's housing supply. The Center supports the comments on this bill previously submitted by Elizabeth Elia, Associate Professor at UNM School of Law, Allison Freedman, Assistant Professor at UNM School of Law, Serge Martinez, Professor at UNM School of Law, and Rachel Biggs, Chief Strategy Officer at Albuquerque Health Care for the Homeless and reiterates the following suggested revisions:

- 1) Amend Section 1 to make clear in Section 14-16-4-3(B)(5)(a) that two-family detached dwellings are permitted as-of-right in R-1 zones regardless of whether they are on one or two lots. The Center strongly supports Section 1, which would allow two-family dwellings as-of-right in all R-1 zones, and Section 2, which would allow detached accessory dwellings with kitchens as-of-right in most R-1 zones. However, as written, 14-16-4-3(B)(5)(a) makes it appear as though the additional dwellings are only permissible if the units are on separate lots. The language should be re-written to make clear that the two dwelling units can be *on the same or* separate lots. Making this minor amendment will increase housing supply in R-1 zones without materially affecting the characteristics of the neighborhood.

- 2) Amend Section 3 to retain an incentive based on the provision of affordable housing. Exempting conversions from non-residential developments to multi-family dwellings from the definition of “kitchen” will make conversions significantly more affordable while still providing quality, permanent housing options for people who have experienced homelessness and people at risk of becoming homeless. The Center suggests amending this provision to retain the incentive based on the provision of affordable housing. The prior version of this bill tied the exemption to the creation of affordable housing funded by the Department of Families and Communities and capped the maximum number of conversion units to 100 in any development. By removing the unit cap and public funding requirement, this amendment removes one of the leverage points currently contained in the IDO to incentivize private owners’ creation of affordable housing.
- 3) Amend Section 4 to include a moderate, across-the-board increase to building height limits in R-MF and Mixed-Use zones and provide bonus height increases tied to commitments to create workforce or affordable housing. Eliminating building height maximums for multi-family residential and mixed-use developments removes undesirable restraints on housing developers with regard to maximizing allowable density. However, removing all height restrictions is of minimal value given other constraints associated with steel construction. To achieve the goal of increasing housing supply without unnecessarily restricting developers’ ability to achieve maximum allowable density, The Center supports the recommendation of previous commenters to include a moderate across-the-board increase in height limits in R-MF and Mixed-Use zones, with bonus height increases tied to commitments to create workforce or affordable housing.
- 4) Amend Section 6 to provide a stepped approach to the parking exemption ranging from 100% - 50% depending on a project’s proximity to quality alternative transportation options. Reducing the off-street parking requirements for multi-family dwellings in mixed-use zones undoubtedly reduces the cost of developing housing. However, this incentive may ultimately push housing development to areas that are remote from the centers and corridors intended by the Comprehensive Plan to absorb additional density. Amending Section 6 to

provide for a stepped approach, with increased exemptions based on proximity to quality transit stations, will best help the City to achieve the goals outlined in the Comprehensive Plan.

The Center urges the Planning Department to make these important revisions to O-22-54 in order to most effectively achieve the goal of increasing private and affordable housing development in conformity with the Comprehensive Plan.

Thank you for the opportunity to comment.

/s/ Maria Griego

Maria Griego
Director of Economic Equity
NM Center on Law and Poverty
maria@nmpovertylaw.org
505-302-2628

From: sharonhausam1@gmail.com
To: [City of Albuquerque Planning Department](#)
Cc: ["Near North Valley Neighborhood Association"; "Joe Sabatini"](#)
Subject: Support for ADUs
Date: Monday, November 28, 2022 9:00:37 AM

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

Dear Environmental Planning Commissioners and Planning Staff:

As a resident of the Near North Valley neighborhood, a professional community planner, and a citizen of Albuquerque concerned about the shortage of affordable housing, I am registering my support for the measures currently under review to increase the availability of Accessory Dwelling Units. I would appreciate this support being noted in the planning staff report.

I anticipate submitting additional comments for EPC consideration.

Sharon Hausam, Ph.D. (*she/her/hers*)
sharonhausam1@gmail.com

From: [Herndon, Pamela](#)
To: [City of Albuquerque Planning Department](#)
Subject: Comments in Support of IDO changes outlined in O-22-54
Date: Monday, November 28, 2022 7:46:41 AM
Attachments: [House of Representatives image.png](#)

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

Dear Commissioners,

My name is Representative Pamela Herndon. I represent House District 28 in the Northeast Heights and I'm writing to convey my support for the IDO changes outlined in O-22-54. The proposed changes will help increase the supply of sustainable housing units for the unhoused. We must take a more proactive approach to providing sustainable housing for the unhoused. and approving the changes outlined in O-22-54 is a first step.

As policy makers, it is critically important that you take innovative steps toward accessing unused buildings and other structures to make more housing options available to those in need. As a point of innovation, you can consider working with Skilled Trade Unions to train the unhoused in a skilled trade such as construction, welding, or electrical work so the unhoused if they are able to do so, can assist in the remodeling buildings and other structures, making them more compatible for sustainable housing. Central New Mexico Community College has launched a program focused on increasing the number of individuals who are being trained to fill the skilled trades needed in New Mexico. Training the unhoused in skilled trades that can be used to create more sustainable housing in our city and throughout our state is a win-win for everyone. You will create housing, an opportunity for apprenticeships and jobs.

The first step Commissioners is to approve the IDO changes outlined in O-22-54. Let's work together to increase sustainable, affordable housing in our city and our state. We can do this.

Respectfully submitted,

Rep. Pamela Herndon
House District 28



Final comments for Nov. 28th deadline for Staff Report:

Chair Timothy MacEachen, and fellow Commissioners,

The IDO annual update process is extremely time consuming to everyone involved. Each year there are too many amendments with not enough time to review, not enough explanation to understand all the amendments to address adequately, which can lead to unintended consequences for the community. I feel more research and analysis, explanation, public vetting, and public support is needed, before the substantive amendments go before the EPC for review and approval. The ICC has proposed suggestions to the City to help develop a better process so the public better understands the amendments being proposed. This includes better explanation of the intent of the amendment, the source of the amendment, what are the potential impact risks to community protections, who benefits from the proposal, who does it impact - A pros and cons approach.

The IDO annual amendment update has now just begun again, right after finishing up the last batch of IDO amendments, and right before the Holidays. I recommend starting at the beginning of the year, instead of the end of the year, and just before the Holidays.

This IDO update started with 35 citywide amendments, now it is up to 49 amendments. There are also 2 small area amendments, and the recent introduction of the 0-22-54 Housing Amendment, with not enough time to review or respond adequately. Here are my comments:

For 49 Citywide Amendments: a spreadsheet was offered for public comment. Most of those amendments were substantive and needed better explanation. Many residents have expressed to me that they did not understand most of the amendments and therefore did not comment. I too had a hard time interpreting many of them. I did my best to provide comments on some of them. There has been not been enough public vetting to gain community support before these amendment were submitted. Therefore, I suggest that if the substantive amendments are too difficult to understand or interpret or would have a negative impact on the community they should not be approved.

For the Small Area Amendments: In regards to the Northwest Mesa View Protection Overlay Zone VPO-2 there is absolutely no Community support for this amendment, as it would alter the IDO overlay language, weakening the view protection along the escarpment. Views are extremely important to the Community, below and above the escarpment and on the mesa top near the Petroglyphs. A facilitated meeting took place in October to discuss this amendment. As a result the public learned that Consensus Planning submitted the amendment which would benefit a client of theirs for a particular piece of property on top of the mesa which is now under dispute, and may constitute spot zoning. Note: The Park Service has also expressed that Native American's continue to have religious ceremonies on the mesa and that views are an important component of the religious experience. Therefore, this amendment should not be approved.

For the Housing 0-22-54 Amendment: Was recently submitted, with little to no time to review, therefore there is no Community support as these amendments promote significant changes citywide by increasing the density, removing building height restrictions, and promote parking reductions. These are huge changes that would have negative impacts to the quality of life in Albuquerque, and would be difficult to reverse if approved. Currently there is no support for this Amendment as proposed.

Once amendments are approved or entitlements are given, there usually is no turning back to fix a problem. This is why there needs to be better public engagement to improve the IDO process.

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

From: [Huval, Lisa L.](#)
To: [City of Albuquerque Planning Department](#)
Cc: [Pierce, Carol M.](#)
Subject: Written Comments to EPC on Proposed IDO Changes
Date: Wednesday, November 30, 2022 4:29:22 PM
Attachments: [EPC Letter 11.30.22.pdf](#)
[image001.png](#)

Hello,
Please find comments from DFCS attached. Thank you!

Sincerely,
Lisa Huval



LISA HUVAL
Deputy Director of Housing
O 505.768.2877
cabq.gov/family

Department of Family and Community Services
Carol M. Pierce, Director

Timothy M. Keller, Mayor

November 30, 2022

Dear Environmental Planning Commission Members:

On behalf of the Department of Family and Community Services, I am writing in support of Mayor Keller's proposed changes to the IDO that would increase the supply of housing in Albuquerque. Those changes include permissively allowing two-family dwellings in R-1 districts, exempting certain kitchen requirements in non-residential to residential conversions, eliminating building height maximums for multi-family projects, exempting affordable housing projects from off street parking requirements, and adding parking reductions for multi-family dwellings in mixed use zone districts.

Albuquerque is facing an unprecedented housing crisis, with low-and-moderate income renters and homeowners struggling to find safe, decent housing that they can afford. A root cause of the housing crisis is lack of housing supply. A recent study commissioned by the NM Mortgage Finance Authority found that Bernalillo County will need over 10,000 housing units by 2025 in order to meet the full demand for housing. Of these, at least half will need to be affordable to households at or below 80% AMI.

Albuquerque will not be able to create enough safe and decent housing, that is affordable to households across the income spectrum, without new, creative strategies. Mayor Keller's proposed changes offer a fair and reasonable approach that will have a real and meaningful impact on Albuquerque's housing crisis.

Sincerely,

DocuSigned by:

6C76327D0D2A426...

Lisa Huval

Deputy Director of Housing

cc: Carol Pierce, Director of Family & Community Services Department

From: [Toni Johnson](#)
To: [City of Albuquerque Planning Department](#)
Subject: IDO conversion
Date: Tuesday, November 29, 2022 10:15:11 AM

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

To whom it may concern,

I am writing you to express my support for the R1 zoning to be allowed to be changed to duplexes, I have a buyer that wants to buy a SFH and transform it into a duplex; this kind of investment would benefit her and her renters. I also think R1 zoning should allow for casitas or in-law quarters because there is a great number of ABQ residents that have extended families and would very much appreciate this feature. All of these changes would provide many ABQ residents affordable housing, which is so badly needed. I very much support these changes

Thank you,

Antonieta "Toni" Johnson, Realtor

Associate Broker ☐ R1

C: 505-569-2673

O: 505-814-009

@homehuntertj

Hablo Español

[https://ddec1-0-en-ctp.trendmicro.com:443/wis/clicktime/v1/query?](https://ddec1-0-en-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.youtube.com%2fchannel%2fUCcsrIsC2dH1BiT7iX4YG%2dVQ&umid=5bd3a46c-520c-4568-a9f6-a03410b4abad&auth=307405480ca3e49a8b1deb4e49ca5cd244e7e096-6105765a02642b1ec1094a6d35dada3c6e6807f2)

[url=https%3a%2f%2fwww.youtube.com%2fchannel%2fUCcsrIsC2dH1BiT7iX4YG%2dVQ&umid=5bd3a46c-520c-4568-a9f6-a03410b4abad&auth=307405480ca3e49a8b1deb4e49ca5cd244e7e096-6105765a02642b1ec1094a6d35dada3c6e6807f2](https://ddec1-0-en-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.youtube.com%2fchannel%2fUCcsrIsC2dH1BiT7iX4YG%2dVQ&umid=5bd3a46c-520c-4568-a9f6-a03410b4abad&auth=307405480ca3e49a8b1deb4e49ca5cd244e7e096-6105765a02642b1ec1094a6d35dada3c6e6807f2)

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To: City of Albuquerque Planning Department
Subject: IDO conversion
Date: Tuesday, November 29, 2022 10:15:11 AM

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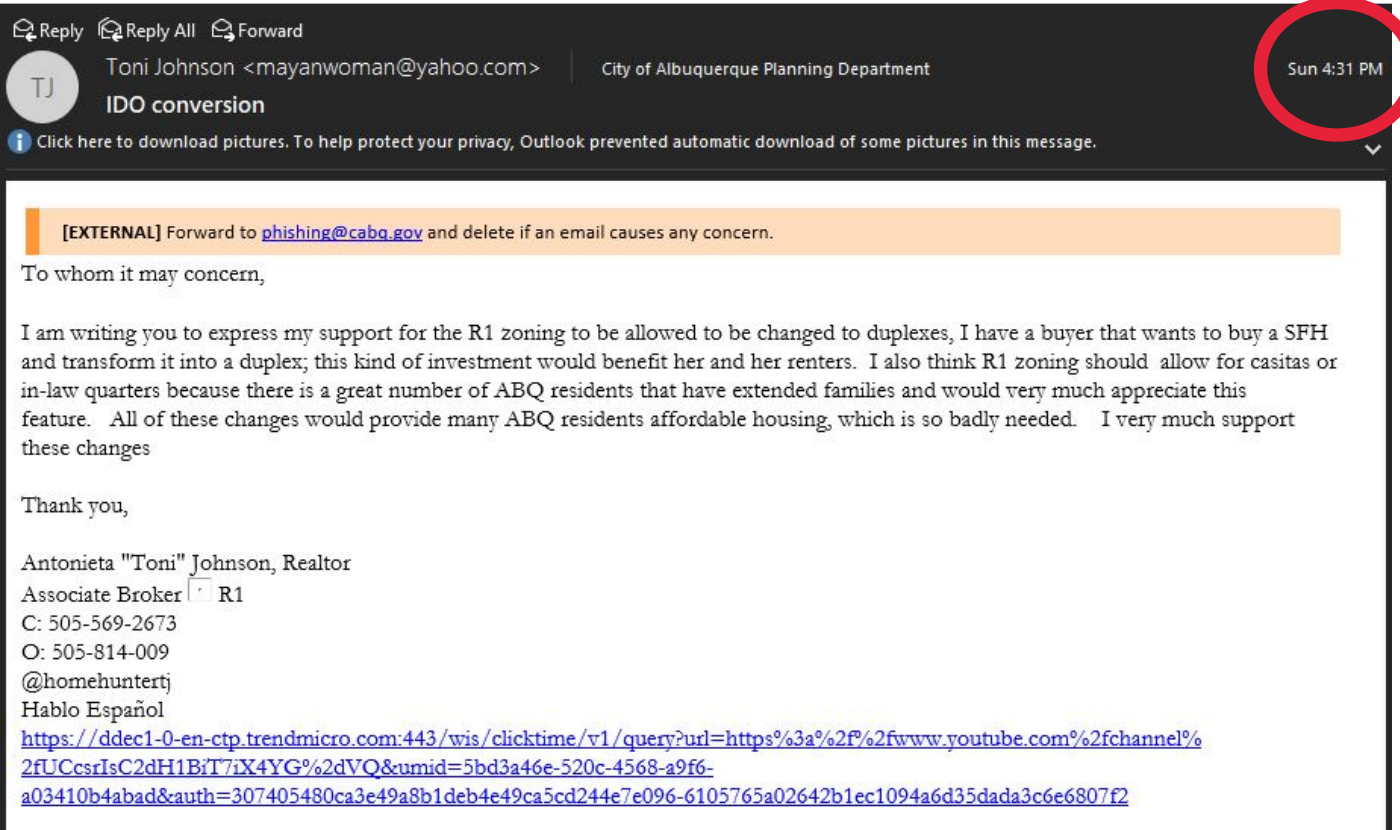
Hablo Español

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[url=https%3a%2f%2fwww.youtube.com%2fchannel%2fUCcsrIsC2dH1B7iX4YG%2dVQ&umid=5bd3a46e-520c-4568-a9f6-a03410b4abad&auth=307405480ca3e49a8b1deb4e49ca5cd244e7e096-6105765a02642b1ec1094a6d35dada3c6e6807f2](https://ddec1-0-en-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.youtube.com%2fchannel%2fUCcsrIsC2dH1B7iX4YG%2dVQ&umid=5bd3a46e-520c-4568-a9f6-a03410b4abad&auth=307405480ca3e49a8b1deb4e49ca5cd244e7e096-6105765a02642b1ec1094a6d35dada3c6e6807f2)

The e-mail above arrived prior to the 9:00 a.m. (MST) cut-off time on Monday, 28 November 2022, as it was in SPAM file folder. The image below shows the original email time and date it was submitted on Sunday, 27 November 2022 at 4:31 p.m. (MST).

- Misa Bloom, 20221129



From: [Howie Kaibel](#)
To: [City of Albuquerque Planning Department](#)
Subject: IDO Changes letter of support
Date: Monday, November 28, 2022 10:45:20 AM
Attachments: [IDO Letter of Support.docx](#)

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

Please find my letter of support for upcoming IDO change considerations attached. Thank you.

--



Howie Kaibel
Brand Manager
Minister of Culture



M'tucci's Restaurants
(505) 514-8650
He / Him / His

Need to set up a meeting with me?
Grab a time slot [here](#).

Environmental Planning Commission
City of Albuquerque

Re: Upcoming IDO Changes

To whom it may concern:

As a Brand Manager for a local restaurant company and real estate investor, I believe allowing higher density developments in the City of Albuquerque is a positive thing for our City and State.

I support the IDO changes to allow two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing the kitchen requirements.

Please consider supporting these changes.

Sincerely,

Howie Kaibel
Brand Manager, M'tucci's Restaurants

From: [peter.kalitsis](#)
To: [City of Albuquerque Planning Department](#)
Subject: Fwd: Proposed additional amendments regarding new affordable housing for EPC of the IDO Annual Update 2022
Date: Monday, November 28, 2022 8:43:48 AM
Attachments: [IDO PROPOSED ADDITIONS SRO AND AFFORDABLE HOUSING COMMENTS 11 27 22.docx](#)

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

Attention: Chair MacEachen

I am attaching proposed IDO amendments for the 2022 IDO amendment cycle

Sincerely,

Peter S. Kalitsis,

Cell - 505-463-4356

----- Forwarded message -----

From: peter kalitsis <peterkalitsis@gmail.com>

Date: Mon, Nov 28, 2022 at 8:41 AM

Subject: Proposed additional amendments regarding new affordable housing for EPC of the IDO Annual Update 2022

To: Planning Department <abcto@cabq.gov>

I am attaching proposed IDO amendments for the 2022 IDO amendment cycle.

Sincerely,

Peter S. Kalitsis,

Cell - 505-463-4356

From: Peter S. Kalitsis, Resident of Parkland Hills, 921 Pampas Dr. SE, Albuquerque, NM 87108

Email abcto@cabq.gov

Attention: Chair MacEachen

Re: Comments for the EPC regarding IDO Annual Update 2022 including both:

1. Amendment proposal to provide new category of occupancy of single room occupancy.
and
2. Amendment proposal to provide for additional affordable housing through providing that all new rental housing development greater than 14 units shall include 15% for affordable units and all new housing development greater than 19 units for purchase shall include 10% for affordable housing units.

As a resident of Parkland Hills Neighborhood, I, Peter S. Kalitsis, 921 Pampas Dr. SE, Albuquerque, NM 87108, am sending proposals for two new IDO amendments to assist in helping to alleviate the problem of inadequate safe and affordable housing for the unhoused and the poor members of our community.

Amendment Proposal 1:

Provide new category of occupancy of single room occupancy. Proposed IDO amendment to add Single room occupancy (SRO) as a new category permissive in all MX and multifamily zoned areas.

Purpose:

To help alleviate issues of homelessness created by lack of affordable housing opportunities where there is current rents that is unattainable for the extreme Poor.

This category will provide for weekly rentals. Communal Facilities will include bathrooms, and communal kitchens. Sleeping living space shall be available for singles or double occupancy.

Amendment Proposal 2:

All new rental housing development greater than 19 units greater than 14 units shall include 15% for affordable units.

All new housing development of greater than 19 units for purchase shall include 10% for affordable housing units. Affordable housing units shall be as defined by the federal government or as the Albuquerque city council chooses period. The intent of this is to help further alleviate the lack of affordable housing that contributes to homelessness and occupancy of substandard and dangerous housing conditions.

From: [peter.kalitsis](#)
To: [City of Albuquerque Planning Department](#)
Subject: Comments for the EPC regarding IDO Annual Update 2022
Date: Sunday, November 27, 2022 3:02:25 PM
Attachments: [IDO CHANGES COMMENTS KALITSIS 11 27 22.pdf](#)

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

Attention: Chair MacEachen

I am attaching my comment to be included in the packet for the EPC study session that is due at this email address. If you have any questions please do not hesitate to contact me.

Sincerely,

Peter S. Kalitsis,

Cell - 505-463-4356

From: Peter S. Kalitsis, Resident of Parkland Hills, 921 Pampas Dr. SE, Albuquerque, NM 87108

Email abcto@cabq.gov

Attention: Chair MacEachen

Re: Comments for the EPC regarding IDO Annual Update 2022 including both:

- A. O-22-54 City Council Bill proposed changes to the IDO.
and
- B. EPC Submittal - Citywide Proposed Changes "Printed 10/27/2022"

As a resident of Parkland Hills Neighborhood, I, Peter S. Kalitsis, 921 Pampas Dr. SE, Albuquerque, NM 87108, am sending my personal comments and recommendations regarding the to the 2022 IDO proposed changes, both the O-22-54 City Council Bill proposed changes to the IDO, in addition to the 13 page published planning proposal.

A. O-22-54 City Council Bill proposed changes to the 2022 IDO.

Proposed City Council Amendment:

SECTION 3. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO EXEMPT ALL CONVERSIONS FROM NON-RESIDENTIAL DEVELOPMENT TO MULTI-FAMILY DWELLINGS FROM THE DEFINITION OF KITCHEN.

Intent: Developers converting non-residential buildings to multi-family housing would not have to meet the existing kitchen standard of having a cooking stove, range or oven or full size refrigerator in each unit. They would only have to provide a microwave, hotplate or warming device.

Support with modifications to amendment: Though I support this as a great opportunity to provide much needed increase in housing in Albuquerque, I request the following be included in this proposed amendment:

- (1) I support the inclusion of opening this up to private developers to permit greater opportunity for expansion of much needed housing opportunities.
- (2) I do support modification of kitchen requirements but do not support the lack of a required traditional cooking appliance, a hotplate or a cooktop. I further request that the requirement for a hotplate be included in existing FCS funded projects. The cost of this is so minor as compared to the addition of plumbing for a kitchen sink, which is currently required. Providing hot a hotplate and a microwave would be a minor cost in contrast to the healthy and economical food preparation opportunities,
- (3) I support permitting a compact size refrigerator in transitional housing with support services, but request that housing, without support services, is permanent housing and should include a full size refrigerator so as to permit more economical food purchase and storage opportunities.
- (4) Research of this effectively (though not technically actual) city wide zoning change should be done by an independent entity so as to identify potential ramifications and significant positive and adverse impacts on the surrounding communities, and methods to support or prevent these impacts. This would include whether 24 hour on-site management or security would be needed if this was transitional versus permanent housing, for the safety of the residents.

My Observations and Comments are as follows:

- a. I request that a hotplate be required as it permits cooking by residents, rather than just a microwave, which does not reasonably permit the preparation of inexpensive and nutritious meals.
- b. An example of the inadequacy of just providing a microwave and compact refrigerator that many of us have experiences is not different than staying in typical hotel rooms while traveling, where there is a microwave and small refrigerator. Under these conditions, it is clear to see the inability to cook or store larger less expensive quantities of food cooked to last economically. This clearly is meant to give existing hotels the ability to convert to apartments without true cooking facilities while harming those who can least afford the increased cost of fast food.
- c. Though for short term temporary/emergency housing, a compact refrigerator can suffice, for permanent housing, requiring a full size refrigerator with freezer permits more economical, and less frequent shopping with adequate storage of food, both before and after preparation. This results in less costly and greater opportunity for more nutritious meals, particularly in residences that house more than one person. This could also make for greater accommodation of more persons in a single housing unit.

Differentiating intent could be possibly identified where, as permanent housing should less likely need minimum of 40 hours of support services a week to be provided to residents when this is utilized as transitional housing.

- d. To add a full size refrigerator, a hotplate to cook on and a microwave could require not more than the addition of 2 circuits, at most, to the existing electrical system for each kitchen, which in an existing office, or commercial building would likely have adequate circuiting available or adding 2 - 20 amp, 120 volt circuits to converted hotels which would likely already have a microwave and compact refrigerator, would be minor in comparison to the cost benefit of the residents and the virtual guarantee of 100 percent occupancy for these underutilized buildings.
- e. If needed, the cost of the circuits would be far less than the city currently paying \$50,000 to \$60,000 to purchase existing apartment units that often need extensive remodeling. The city could even pay for this as paying \$2000 to permit full cooking and food refrigeration and housing one family unit is nothing compared to medical, food, and other costs of people either on the streets or with inadequate cooking facilities. This cost is likely to be far less than the addition of the required kitchen sink.
- f. If the city council is not willing to require 2 circuits, mandating requiring a hotplate, at minimum, should be included in all of these conversions, existing and new, would not require additional costs.
- g. Inclusion of these very reasonable expenses should not be viewed as a burden for developers. As this is not indicated to be required to be rented at below market rents, this could become a permanent part of the city's future housing stock.
- h. Providing a great opportunity for developers and property owners for 100 percent occupancy should negate the extra cost of adding 2- 20 amp circuits to each unit, likely to cost no more than \$2000 per unit, probably far less if completed at one time. Otherwise, any rundown hotel on central could immediately change to this form of permanent housing, without providing reasonable living accommodations rather than a warehousing of the poor. I do not support permitting a giveaway of 100 percent occupancy and profit to developers at the expense of the poor.
- i. Based upon the difficulty of cooking nutritious meals in a microwave, I request that the current exception for not providing a true cooking appliance of a hotplate at facilities receiving FCS funding should be eliminated, even for transitional housing.

- j. Examination of Inclusion of 24 hour security or on call security, or 24 hour management on site to provide a secure environment for persons who might be in transition. No mention of security at these non FCS funded facilities has been included. Requiring 24 hour security or management or availability of quick emergency response, so as to protect these residents of transitional housing should be considered for inclusion in this amendment.
- k. Inclusion of all developers, not just those connected with the FCS, is a great opportunity to increase sorely needed housing which I support with the following conditions:
 - (1) A request for independent research on the possible effects of these “in effect Zoning changes”, such as what has occurred in other cities where this great opportunity has been attempted, could greatly help in the successful implementation of this opportunity. As zoning is a carefully vetted process, permitting an effective, if not actual zoning change to all non-residential development, without carefully examining the outcomes could cause permanent damage to the community, or it could be a great boon for the community. It would be good to answer including would this likely be located on the central avenue corridor, overburdening existing suffering neighborhoods.
- l. Cost of inclusion of more effective facilities would more effectively permit these to be permanent housing versus temporary transitional housing.

END OF COMMENTS for O-22-54

B. EPC Submittal - Citywide Proposed Changes "Printed 10/27/2022"

Proposed Amendment: Item 44 – Page 582, Section 7-1, (2 published versions)

IDO Annual Update 2022 - Pre-EPC Submittal - Citywide (Page numbers refer to IDO Draft Effective December 2022)

Page	Section	Change / Discussion	Explanation	Source
Multiple	6	Walls & Fences - Front Yard Wall Delete the row " Permit - Wall or Fence - Major" in Table 6-1-1 and Subsection 14-16-6-6(H).	Replaces ZHE with administrative approval for walls up to 5 feet in the front yard with view fencing citywide. See related row for text edits to Subsection 14-16-5-7(D)(3)(a)(2).	Admin
556	7-1	Definitions, Flood Definitions Floodplain Revise text as follows: Any land susceptible to being inundated by water area that is subject to a one percent or greater chance of flooding in any given year (i.e. a base flood), as defined by the Federal Emergency Management Agency and shown on National Flood Insurance Program maps, from any source. The floodplain includes both the floodway and flood fringe. See also Sensitive Lands Definitions.	Ties the definition of floodplain to FEMA definitions and to other defined terms for Flood in the IDO.	Staff
577	7-1	Definitions, Overnight Shelter Revise term to "Transitional Shelter" wherever it appears in the IDO and revise definition as follows: "A facility that provides temporary or transitional sleeping accommodations for 6 or more persons for a period of less than 24 hours within completely enclosed portions of a building with no charge or a charge substantially less than market rates value. Such facilities it may provide meals and personal assistance, personal services, social services, personal care, and protective care. Any such facility open to clients between 10:00 P.M. and 7:00 A.M. is considered an overnight shelter. This use does not include skilled nursing care, which is regulated as either hospital or nursing home for the purposes of this IDO. See also Community Residential Facility, Group Home, Hotel or Motel, Campground or Recreational Vehicle Park, and Safe Outdoor Space."	Revises the definition so that it does not overlap with hotel or nursing home that happens to charge substantially less than market rates. Revised definition is intended to better match the operations of many shelters. Having definitions be as parallel as possible helps make their distinctions clear and enforceable.	Staff

03-IDO-Annual-Update-2022-Citywide-EPC-submittal.pdf - Adobe Acrobat Reader (32-bit)

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12 / 13

IDO Annual Update 2022 - EPC Submittal - Citywide
(Page numbers refer to IDO Effective December 2022: <https://tinyurl.com/CABQ-IDO-12-2022>)

Item	Page	Section	Change / Discussion	Explanation	Source
44	582	7-1	Definitions, Overnight Shelter Revise term to "Transitional Shelter" wherever it appears in the IDO and revise definition as follows: "A facility that provides temporary or transitional sleeping accommodations for 6 or more persons for a period of less than 24 hours within completely enclosed portions of a building with no charge or a charge substantially less than market rates value. Such facilities it may provide meals and personal assistance, personal services, social services, personal care, and protective care. Any such facility open to clients between 10:00 P.M. and 7:00 A.M. is considered an overnight shelter. This use does not include skilled nursing care, which is regulated as either hospital or nursing home for the purposes of this IDO. See also Community Residential Facility, Group Home, Campground or Recreational Vehicle Park, Hotel or Motel, Nursing Home, and Safe Outdoor Space."	Revises the definition so that it does not overlap with a hotel that happens to charge substantially less than market rates, a safe outdoor space that charges less than market rates but happens outdoors, or a nursing home, which includes skilled nursing care. Revised definition is intended to better match the operations of many shelters. Having definitions be as parallel as possible helps make their distinctions clear and enforceable.	Staff
45	582	7-1 [new]	Parking Definitions, EV Capable Add a new term with text as follows: "Parking spaces with a capped cable/raceway connected to an installed electric panel with a dedicated branch circuit(s) to install the infrastructure and equipment needed for a future electric vehicle (EV) charging station with a rating of 240 volts or higher."	Adds a new term related to a proposed new requirement for multi-family and townhouse dwellings. See related rows for proposed change to off-street parking requirements in Subsection 5-5(C)(9).	Staff
46	585	7-1	Definitions, Personal and Business Services Revise text as follows: "Establishments providing services to individuals or businesses for-profit, including but not limited to bail bond providers, beauty and barber shops, shoe repair, tailor/alterations shops, tattoo parlors, taxidermy services, electronic data processing, and employment service; mailing, addressing, stenographic services; and specialty business service such as travel bureau, news service, exporter, importer, interpreter, appraiser, and film library."	Clarifies that regulations related to personal and business services apply whether they are for-profit or non-profit.	Staff

CABQ Planning - IDO Annual Update 2022 - EPC Submittal 12 of 13 Printed 10/27/2022

Oppose: This is intended to permit hotels throughout the city to be used as homeless shelters without requiring conditional use permit process.

The intent clearly states “Revises the definition so that it does not overlap with a hotel that happens to charge substantially less than market rates,”.

This attempt to exclude hotels from being included in Overnight shelters removes the conditional use of overnight shelter if they are hotels, therefore permitting all hotels that are run as homeless shelters to be permissive and not require a conditional use permit as required by the IDO for all overnight shelters. Though this is a citywide amendment proposal, it appears that it is specifically directed at the purchase of the hotel at Hotel Circle off of Eubank.

in all instances. This appears to be This this appears to need intense research to understand the serious ramifications that could come with this seemingly simple slight definition change, such as permitting the city to purchase or lease hotels, and utilize them as shelters for the unhoused, without going for the current required conditional use permit approval. It appears to be a possible workaround of existing IDO regulations. This change appears to create confusion, rather than clarity. I would question the need for this change

My requested Recommendations and comments are as follows:

- a. The statement “Revises the definition so that it does not overlap with a hotel that happens to charge substantially less than market rates” appears to provide a new category of homeless shelters. Unfortunately, at all the information sessions presented by the planning department, this intent was not addressed. Hotels and motels that charge less than market rates typically would do so under the following conditions:
 - 1) The hotel is: owned by a government agency such as the city, owned by a nonprofit providing accommodations to the unhoused, or by a benefactor acting as a provider of sheltering for the unhoused, which would fall under the definition of both overnight shelter or Transitional Shelter. This would require any hotel under the ownership of any of the above entities to obtain conditional use approval before one person is housed in that facility.
 - 2) If a hotel or motel is supplying a group rate to holders or voucher providers, such as the city or federal government, then, as corporations get discounts, the hotel is still typically a profit making business or organization. Currently the city avoids needing to get conditional use approval as an overnight or transitional shelter, as the hotel is NOT charging substantially less than the market rates.
- b. The term Hotel or Motel being referenced may be confusing. This appears to possibly be If the city provides vouchers for a whole motel or hotel, or leases or purchases rooms or the entire building, then it might become an overnight shelter, and therefore would require a Conditional Use permit. This requires intensive and UNBIASED research.

This might be applied to a single hotel site currently the in the process of being purchased at hotel circle.

- c. As related to last year when the administration requested to change MX-H overnight shelters to permissive rather than conditional, and add MH-M as permissive, before the EPC hearing and twice after, including approximately one week before the city council was to vote on the total IDO changes. This appears to be understood that the intent still continues to permit

homeless shelters to be a permissive use in the city and should be presented and openly discussed as such.

- d. The change of the term Overnight Shelter to Transitional Shelter appears to have no justification. Prior to 2020, overnight shelter had no timeframe, and prior to 2018, overnights shelter did not exist in the Zoning Ordinance. Prior to IDO's adoption in 2018. The term that was used was Emergency Shelter which had a definition as follows:

EMERGENCY SHELTER. A facility which provides sleeping accommodations to six or more persons for a period not normally

- 1. exceeding 30 consecutive days, with no charge or a charge substantially less than market value; it may provide meals and social services.

- e. This change from "Overnight Shelter" to "Transitional Shelter" needs to be carefully assessed by an independent agency outside of the administration. This needs to be researched very thoroughly to avoid past errors.

This past year the Zoning Enforcement Officer made a determination that the definition of Overnight shelter, contrary to the City Council's prior 2020 IDO change to include the phrase 24 hours maximum, made a legal determination that that limitation is not valid, and that the definition, as indicated by homeless service providers that this had been an accepted use of the term for over 70 years. (even though the term "overnight shelter" was used for the first time in the 2018 adoption of the IDO and prior to this adoption, the term emergency shelter was used and defined generally up to 30 days.

- f. Unless the city is eliminating the categories of *Community Residential Facility* and *Group Home* from the IDO, these facilities need to be referenced, rather than eliminated, to clarify other options that may better apply than *Overnights shelter* or *Transitional Shelter*. As the proposal to reference skilled nursing care, which is less related to overnight shelters, the exclusion of these categories appears to be in error.

- g. The inclusion of mentioning Nursing Homes, which are licensed and require accreditation, seems redundant as they required medical certification, and are not typically at below market rates, funding being provided. Even if the city was to open a nursing home for the unhoused, it would be a medical occupancy and therefore would come under the zoning classification that is completely separate from sheltering of the unhoused.

If this is an issue, it needs to be examined by licensing agencies as currently, there appears to be no overlap with nursing homes as overnights shelters. It does appear that there may be an attempt to provide nursing home services at overnight shelters which gets into complex legal definitions and should be done only with intensive and UNBIASED legal research.

- h. Though this amendment appears to include minimal changes, this language aligns the definition with group homes, which for some reason are not referenced at the end of this section, though SOS are referenced. It is questionable that the new definition deletes reference to see Group Homes but adds reference to see Hotel or Motel. For these reasons, the
- i. It appears that the return of the pre 2018 zoning definition would be more appropriate and more time tested, so long as the coordination with other sections of the IDO are carefully reviewed.
- j. As the Administration, under the Mayor includes the Planning Department, under the Mayor, is in the appeal process regarding the Overnight Shelter at Gibson, the change of both of these procedures and definitions currently affects the current appeals process. For this reason, these

should be looked at in the context of the current ongoing appeals and the administration's response.

**END OF COMMENTS regarding IDO Annual Update 2022, EPC Submittal –
Citywide Proposed Changes “Printed 10/27/2022”**

**See the following pages for REFERENCED IDO SECTIONS REGARDING
“OVERNIGHT SHELTER” “TRANSITIONAL SHELTER “and relative types of uses**

REFERENCED IDO SECTIONS REGARDING "OVERNIGHT SHELTER"

"TRANSITIONAL SHELTER" and relative types of uses

PROPOSED TEXT

Definitions, Overnight Shelter

Revise term to "Transitional Shelter" wherever it appears in the IDO and revise definition as follows:

"A facility that provides temporary or transitional sleeping accommodations for 6 or more ~~persons for a period of less than 24 hours~~ within completely enclosed portions of a building with no charge or a charge substantially less than market ~~rates value~~. Such facilities ~~it~~ may provide meals ~~and~~, personal assistance, personal services, social services, personal care, and protective care. ~~Any such facility open to clients between 10:00 P.M. and 7:00 A.M. is considered an overnight shelter. This use does not include skilled nursing care, which is regulated as either hospital or nursing home for the purposes of this IDO. See also Community Residential Facility, Group Home, Campground or Recreational Vehicle Park, Hotel or Motel, Nursing Home, and Safe Outdoor Space."~~

CURRENT TEXT

CURRENT DEFINITION

Overnight Shelter

A facility that provides sleeping accommodations for 6 or more persons for a period of less than 24 hours with no charge or a charge substantially less than market value; it may provide meals and social services. Any such facility open to clients between 10:00 P.M. and 7:00 A.M. is considered an overnight shelter. See also *Community Residential Facility, Group Home, and Campground or Recreational Vehicle Park*.

CURRENT DEFINITION

Community Residential Facility

Any building, structure, home, or facility in which persons reside for a period of more than 24 hours and that is designed to help the residents adjust to the community and society and is used or intended to be used for the purposes of letting rooms, providing meals, and/or providing personal assistance, personal services, personal care, and protective care, but not skilled nursing care. This use specifically includes, but is not limited to, facilities for persons meeting the definition of a handicapped person or for other persons protected against housing discrimination under the federal Fair Housing Act Amendments of 1998 (or as amended) and court decisions interpreting that Act. For purposes of this definition, the term handicapped does not include persons currently using or addicted to alcohol or controlled substances who are not in a recognized recovery program. This use shall not include half-way houses for individuals in the criminal justice system or residential facilities to divert persons from the criminal justice system. See also *Family and Group Home*.

Community Residential Facility is divided into 2 categories based on the number of individuals residing in the facility (not the size of the structure).

- 1. Community Residential Facility, Small:** A facility housing between 6 and 8 individuals that do not meet the definition of a family in which personal service, personal assistance, personal care, and/or protective care are provided.
- 2. Community Residential Facility, Large:** A facility housing between 9 and 18 individuals that do not meet the definition of family in which personal service, personal assistance, personal care, and/or protective care are provided.

CURRENT DEFINITION

Group Home

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

Group Home is divided into 3 categories based on the number of individuals residing in the facility (not the size of the structure).

Page 565

- 1. Group Home, Small:** A facility housing no more than 8 unrelated individuals receiving services, plus those providing services.
- 2. Group Home, Medium:** A facility housing between 9 and 18 unrelated individuals receiving services, plus those providing services.
- 3. Group Home, Large:** A facility housing 19 or more unrelated individuals receiving services, plus those providing services.

PRE 2018 OVERNIGHT SHELTER TERMINOLOGY, EMERGENCY SHELTER and DEFINITION

Prior to IDO's adoption in 2018. The term that was used was Emergency Shelter which had a definition as follows:

EMERGENCY SHELTER. A facility which provides sleeping accommodations to six or more persons for a period not normally exceeding 30 consecutive days, with no charge or a charge substantially less than market value; it may provide meals and social services

End of REFERENCED IDO SECTIONS REGARDING

“OVERNIGHT SHELTER” “TRANSITIONAL SHELTER” and relative types of uses

From: [peter.kalitsis](#)
To: [City of Albuquerque Planning Department](#)
Subject: Proposed additional amendments regarding new affordable housing for EPC of the IDO Annual Update 2022
Date: Monday, November 28, 2022 8:42:11 AM
Attachments: [IDO PROPOSED ADDITIONS SRO AND AFFORDABLE HOUSING COMMENTS 11 27 22.docx](#)

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

I am attaching proposed IDO amendments for the 2022 IDO amendment cycle.

Sincerely,

Peter S. Kalitsis,

Cell - 505-463-4356

From: Peter S. Kalitsis, Resident of Parkland Hills, 921 Pampas Dr. SE, Albuquerque, NM 87108

Email abcto@cabq.gov

Attention: Chair MacEachen

Re: Comments for the EPC regarding IDO Annual Update 2022 including both:

1. Amendment proposal to provide new category of occupancy of single room occupancy.
and
2. Amendment proposal to provide for additional affordable housing through providing that all new rental housing development greater than 14 units shall include 15% for affordable units and all new housing development greater than 19 units for purchase shall include 10% for affordable housing units.

As a resident of Parkland Hills Neighborhood, I, Peter S. Kalitsis, 921 Pampas Dr. SE, Albuquerque, NM 87108, am sending proposals for two new IDO amendments to assist in helping to alleviate the problem of inadequate safe and affordable housing for the unhoused and the poor members of our community.

Amendment Proposal 1:

Provide new category of occupancy of single room occupancy. Proposed IDO amendment to add Single room occupancy (SRO) as a new category permissive in all MX and multifamily zoned areas.

Purpose:

To help alleviate issues of homelessness created by lack of affordable housing opportunities where there is current rents that is unattainable for the extreme Poor.

This category will provide for weekly rentals. Communal Facilities will include bathrooms, and communal kitchens. Sleeping living space shall be available for singles or double occupancy.

Amendment Proposal 2:

All new rental housing development greater than 19 units greater than 14 units shall include 15% for affordable units.

All new housing development of greater than 19 units for purchase shall include 10% for affordable housing units. Affordable housing units shall be as defined by the federal government or as the Albuquerque city council chooses period. The intent of this is to help further alleviate the lack of affordable housing that contributes to homelessness and occupancy of substandard and dangerous housing conditions.

From: [Nikhil Lucas Kamat](#)
To: [City of Albuquerque Planning Department](#)
Subject: support for Mayor's O 22-54 Citywide amendments to the zoning code
Date: Sunday, November 27, 2022 2:52:09 PM

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

Given the lack of affordable housing and changes in household demographics, cities including Albuquerque, need to have more affordable housing. People need more housing options, not less, such as income support, multi-generational housing, multiple income housing, etc. These options take the form of apartments, duplexes, houses, casitas, co-housing, changes in zoning codes, etc.

Thanks,

Nikhil & Susan Lucas Kamat

From: [Dubra Karnes-Padilla](#)
To: [City of Albuquerque Planning Department](#)
Subject: Proposed IDO Changes
Date: Monday, November 28, 2022 4:57:51 PM

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

Proposed IDO Changes - Housing Forward ABQ

Dear City of Albuquerque,

As we address the shortage of housing and the high cost of rents, avenues for home ownership, and our homeless population, can we also keep in the forefront of our planning decisions creating a livable, walkable, sustainable and aesthetically pleasing environment in Albuquerque. Some of these changes to the IDO concern me and the unintended consequences that can arise from our rush to build.

04-Eliminate building heights. Not having a reasonable height restriction for apartments building by existing neighborhoods leads to misunderstandings and mistrust of our City Planning and Zoning Department. The visual you have of apartments being built in Albuquerque for Housing Forward is a perfect example.

I live on the Westside in the HOA Seven Bar North neighborhood. This development you are touting as affordable housing on your Housing Forward Project is not in my backyard, but it is in my neighbors backyard. Some have lived there since their homes were built in 1997. Now many who live on the street of Carreta NW have move somewhere else in Albuquerque or out of state.

We tried in the summer of 2020 to get the developers to consider lowering the height. To consider townhomes that were two stories tall. To have a reasonable height of two stories on the homeowners boundary and move the tallest apartment buildings towards Golf Course Road. Not a chance.

They are building four stories of luxury apartments that block any view when my neighbors walk out into their backyards that they have enjoyed for years. Now their view will be staring straight up at 4 stories of apartments, and there will be 4 of these 4 story units on this 8.77 acres. With no park, only parking. The only park within safe walking distance already serves two large neighborhoods.

How affordable will this gated apartment development really be? They do not even claim to be affordable housing. They are claiming they will be high end with granite and stainless steel - impressive - no. But, they will charge and impressively high rent, while adding to traffic and other environmental issues.

Golf Course and Westside Multi-family Apartment Development A-12 & A-13
8.77 acres
Tierra West, LLC for Callabacillas Group, C.O. Donald Harville
4 stories tall - 45 ft

208 total apartments
376 parking spaces for units

05 & 06 - If I am understanding these changes correctly, you would not require parking spaces be included for dwellings. Why would we want to create more on street parking? Are you planning on making roads wider or just more congestion?

You speak of "...housing options to meet many important needs." Please don't just react to this affordable housing shortage without thinking about the Albuquerque we can build for our future generations that is walkable, bikeable, sustainable, livable and beautiful.

Sincerely,
Dubra Karnes-Padilla
10919 Cascada Azul Place NW

From: [Shawna Katzenmeyer](#)
To: [City of Albuquerque Planning Department](#)
Subject: Upcoming IDO Changes
Date: Sunday, November 27, 2022 1:45:41 PM

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

Environmental Planning Commission
City of Albuquerque

Re: Upcoming IDO Changes

To whom it may concern:

Thank you for taking the time to read my email. As a local business owner and real estate investor here in Albuquerque, I believe allowing higher density developments in the City of Albuquerque is a positive thing for our City and State.

I support the IDO changes to allow two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing the kitchen requirements.

Please consider supporting these changes.

Sincerely,

Shawna Needham

From: [David Keating](#)
To: [City of Albuquerque Planning Department](#)
Cc: [Davis, Pat](#); [Mayor Keller](#)
Subject: Proposed IDO Changes
Date: Sunday, November 27, 2022 3:35:40 PM

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

November 27, 2022

Timothy MacEachen
Chairman
Environmental Planning Commission
City of Albuquerque

Dear Chairman MacEachen,

I am writing to express my opposition to elements of O 22-45 that ostensibly will create affordable housing, but in neighborhoods like mine will more likely result in investor-owned housing that will invite turnover and tear at the fabric of the existing neighborhood. I live in Spruce Park to the west of UNM, on Ash Street which is already challenged by the conversion of family housing to overpriced student rentals.

The single-family house across the street from me was illegally converted into three apartments in 2015, so it serves as a model of what might be expected here if single-family houses are permitted to be converted into duplexes with an additional ADU. The neighboring property is not kept up by the investor landlord. It is stuffed with students. There are up to seven tenant cars that overflow from the enlarged driveway onto the street. The house hosts frequent weekend parties, augmented by social media, that cause noise and disruption until 2:00am and later.

This is just one of a few similar examples on Ash Street, and several across the neighborhood, that would vastly proliferate under the proposed zoning. The eventual outcome is obvious. New families would be priced out of the neighborhood by investors capitalizing on student housing conversions; existing families would move away because of the crowding, disruption, and property degradation; and the cohesion and stability of the neighborhood would disappear. This is an older neighborhood where most of the housing stock was built in the 20s and 30s. The houses are generally small with 50-foot lots and single-car garages and driveways. The density envisioned under the proposed zoning, when applied to a neighborhood built at this scale, would push us into parking, trash, and overcrowding issues.

The current lack of zoning enforcement is already converting us into an investor-owned neighborhood by default. I have lodged two complaints with zoning enforcement regarding the illegal conversion above. The first investigation was closed without action, where even a cursory examination of the property would have revealed the three apartments within the single-family-zoned house.

The other proposed zoning change that concerns me is the elimination of the 28-foot height restriction on lots currently zoned for townhouses. We have a such a lot on Ash Street. It is across from my driveway and currently owned by the LDS Church. Under the proposed zoning, a multistory apartment house could be built on the lot. When I purchased my house and invested in the neighborhood, I did so in part because the then current zoning protected me from such development.

I urge you to consider the real effects of the proposed changes on specific neighborhoods and homeowners. A rushed process risks unraveling decades of deliberation embedded in the former zoning code that have maintained the livability and affordability of the university neighborhoods.

Sincerely,

David Keating

433 Ash Street NE
Albuquerque, NM 87106
505-234-4473
dnkeating@comcast.net

Renz-Whitmore, Mikaela J.

From: Louis Knowles <louknowles47@hotmail.com>
Sent: Thursday, December 1, 2022 8:46 AM
To: City of Albuquerque Planning Department
Subject: Comments on Housing Forward

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

December 1, 2022 8:45 a.m.

To: Environmental Planning Commission, City of Albuquerque

Dear friends:

I wish to convey to you my wholehearted support for the proposed changes in local zoning and building requirements contained in the "Housing Forward" proposal. Our city desperately needs more housing at all income levels but especially for those living below the median family income. We also need to curb urban sprawl caused by density restrictions that exist in local ordinances and administrative rules. No one wants to go the way of Los Angeles, with single family home developments as far as the eye can see. We need to allow greater densities and expanded zoning for more multi-story apartment projects. These residential buildings should be built in areas with good public transit connections.

The conversion of obsolete hotels and motels and other commercial properties that now stand vacant into residential buildings will be an efficient and less costly way of increasing the housing supply. Some of these converted buildings will make ideal facilities for supportive housing for people struggling with mental health issues and addiction. Everyone prefers that homeless individuals not be living in public parks and begging on boulevard medians, but in order for them to leave public spaces there must be housing that meets their needs.

Allowing duplex construction in R-1 zones will provide for a boost in housing for families without significant changes in the quality of life in our neighborhoods. The same can be said for the "Granny cottages" that will be developed in many back yards under the new rules. Not only will these small homes add to the overall housing supply but they will be a way of strengthening families by relieving overcrowding and giving grandparents and other relatives privacy along with easy access to the rest of their family.

All these changes will increase the overall environmental efficiency of our city. The higher densities of residential units will encourage less use of motor vehicles, the growth of neighborhood stores, restaurants and service companies, and more use of public transportation, bicycles and walking to meet the essential needs of day-to-day living.

Sincerely,

Rev Dr Louis L Knowles, Albuquerque NM cell: 646 370 0621
3428 Parsifal St. NE
Albuquerque, NM 87111

From: [Richard Kuhn](#)
To: [City of Albuquerque Planning Department](#)
Subject: Zoning Changes proposed for O-22-54
Date: Monday, November 28, 2022 5:42:02 PM

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

I am writing in support of other neighbors' concerns regarding the zoning changes planned that will affect the Spruce Park Neighborhood.

1. The very short timeframe (one month) makes it difficult to assess the consequences of this zoning change. I'm not convinced those consequences have been adequately assessed.
2. Our location across from UNM makes this special neighborhood very vulnerable to developer/investors who could easily take advantage of the area and totally destabilize this neighborhood.
3. It really seems that there are other prime locations for high density housing along Central as well as other areas that would actually benefit from this change has opposed to being damaged.
4. Again - this process feels very rushed - I doubt most citizens and residential property owners even know what you are doing. Please slow down and clarify the consequences of these kinds of changes.

Sincerely,
Richard Kuhn
1505 Las Lomas NE
Alb., NM 87106

From: [Alan LaSeck](#)
To: [City of Albuquerque Planning Department](#)
Subject: Proposed Changes to the IDO
Date: Monday, November 28, 2022 8:08:15 AM
Attachments: [IDO Changes.pdf](#)

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

On behalf of the Apartment Association of New Mexico, I would like to support the attached proposed changes to the IDO. AANM proudly stands behind all policy that encourages more housing growth at all income levels. Additionally, we recognize the need for more available and affordable housing in Albuquerque.

We believe that expediting the permitting process, additional dwelling units on single family lots, eliminating building height restrictions, reduction of parking requirements for multifamily properties, and promoting motel/hotel conversions will not only encourage rental growth but also have a positive impact on Albuquerque's housing needs.

During the pandemic, Albuquerque rental housing saw a record low in vacancy rates. The private sector has and continues to respond with new multifamily construction. There are currently a total of 49 multifamily projects being developed. This new construction represents 7,004 apartments in the Albuquerque city limits

Even though this is very positive news, we are still falling short of expected future housing needs. Therefore, we believe simple changes to the IDO and positive housing policy will only add to successful solutions within our great city.

We would like to thank the administration for policy that encourages housing growth in Albuquerque. As we all know, housing is a necessity for all economic growth, health, and sustainability for our community.

All the best,

Alan LaSeck

Executive Director

Apartment Association of New Mexico

6755 Academy Rd NE, Ste B | Albuquerque, NM 87109

P: (505) 822.1114 | C: (505) 258.0404

alan@aanm.org | www.aanm.org

Proposed IDO Changes

Housing Forward ABQ



ALBUQUERQUE'S UNIQUE HOUSING CHALLENGES

- The city has identified over 1,300 people experiencing homelessness each night in 2022.
- Studies show we're over 15,000 affordable housing units short in ABQ.
- ABQ rents increased nearly 20% in 2021 compared to 2.6% in 2015.
- Vacancy rate for multi-family development fell below 3%

for the ABQ market in the 1st quarter of 2022.

- Typical Albuquerque home value increased nearly 20% in 2021 compared to 0.2% in 2015.
- Housing prices have increased more than 17% in the 1st quarter of 2022.
- 5,000 housing units of all types need to be added every year statewide to accommodate growth expected by 2025.
- Commitments from Amazon, Netflix, Facebook, and Intel are estimated to bring 40,000 new jobs and

households to the region.

- Increasing the supply of ALL types of housing generally keeps housing prices and rents more affordable.
- R-1 zone district (68% of zoned properties) only allows for one single-family dwelling per lot.
- Low-density residential development includes many housing options to meet many important needs.
- Maximum building heights and required off-street parking can be regulatory barriers to development projects that would increase housing units.

SOLUTION-ORIENTED PROPOSED ZONING CHANGES

** Except where regulations for small areas require otherwise.*

01

Allow two-family dwellings permissively in the R-1 Zone District, citywide.*

02

Allow detached Accessory Dwelling Units with kitchens permissively in the R-1 Zone District, citywide.*

03

Exempt all conversions from non-residential development to multi-family dwellings from the definition of kitchen.*

04

Eliminate building height maximums for multi-family residential development and mixed-use development.

05

Exempt affordable housing from off-street parking requirements.

06

Add a parking reduction for multi-family dwellings in mixed-use zone districts.

From: [Andrew Lipman](#)
To: [City of Albuquerque Planning Department](#)
Subject: Revised IDO
Date: Sunday, November 27, 2022 1:23:29 PM

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

Dear Chairman MacEachen,

As a resident of Four Hills Village for over 28 years and having served in a leadership capacity on a number of Coalition, Neighborhood Association and City Boards. I believe the current proposals to the IDO need more work and greater input from citizens.

In particular the City needs to slow down and answer the following questions:

- **How many casitas are there in the Small Areas where allowed**
- **Where casitas are currently allowed in the city, what percentage are used for family dwellings and what percentage are used for long term rentals?**
- **What data does the city have on casitas used for long-term rentals regarding affordability?**
- **What percentage of casitas is used for vacation or short-term rental?**
- **In the city report “Housing Forward ABQ” the city states “We are working with property owners and community members to determine the most equitable and effective way to limit short-term rentals.” Without a policy in place on short-term rentals, how can the city move forward with plans for changes in R-1? No policy, no enforcement in place. How would the city plan to force current short-term rentals into long term housing rentals?**
- **What study and analysis has the city done regarding infrastructure impacts created by increased density and its effect on utilities—water, electricity, gas, roads, transportation, traffic, trash and recycling.**
- **What study and analysis has the city done on the effects of changes in parking in R-1 areas? Narrow streets with additional on-street parking effects on first responders’ access?**
- **Zoning ordinances are not currently being monitored, inspected and enforced adequately. Will the Planning Department Director and the Mayor certify that zoning is fully staffed to complete inspections, process complaints and issue compliance remedies in a timely way?**
- **What is the plan for review of current zoning violations and complaint backlog?**
- **With many zoning violations not being enforced, what review has/is being done of**

current casitas within the allowed areas for compliance with zoning and what is being done to correct violations?

Thank you for your consideration.

Andrew Lipman
709 Wagon Train Drive SE
Albuquerque, NM 87123
(505) 480-9883

From: [Meghan McDonald](#)
To: [Lehner, Catalina L.](#)
Subject: R-1 Zoning Comments
Date: Friday, November 25, 2022 1:11:54 PM

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

Hello Ms. Lehner,

I heard that you are taking comments for the proposed changes to the R-1 zoning to allow secondary housing units (little houses) in backyards. Here is my comment:

I am in favor of allowing small houses in backyards/side yards if they will be used for housing for permanent Albuquerque residents. I believe this would allow more multi-generational families to live together. This would specifically be useful for our aging elders who would like a separate home and need to be close to relatives for care and family support. The small houses would also be useful for parents with young-adult children who are starting college or are just getting on their feet after graduating high school.

The city should consider a program to help residents build these types of small homes if they will be used for these purposes. This could include pre-designed small houses with plan sets available; a list of contractors pre-approved to build according to code; and example layouts similar to what the city has available for Xeriscape backyards. Most homeowners would struggle to fund these projects, so loan resources would also be valuable.

I am against the use of small houses for Air B&B. The city does not need to add more housing for this business, but needs to take care of those struggling to pay rent in the city. Neighbors do not need an endless cycle of strangers coming and going from their neighbors' backyards.

Thank you for hearing me,
Meghan Vallejo McDonald
Mark Twain Neighborhood Resident

From: [blueskies NM](#)
To: [City of Albuquerque Planning Department](#)
Subject: Objection to Transformative updates to the Zoning Code.
Date: Sunday, November 20, 2022 8:27:23 PM

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

The proposed “transformative” updates to the Zoning Code will be disastrous to Albuquerque families and definitely to Spruce Park. This situation has already played out in neighborhoods near colleges across America.

We moved from Sigma Chi in 2017 and still have not bought a home for this very reason. We have tried to buy a home several times, near campuses in two different cities, Norman Ok, near the Univ of Okla. and Waco Tx. near Baylor Univ. This is what we found...

1. This kind of zoning attracts investors. Which turns houses into a commodity not a HOME for social good, where families live.
2. Home Value is determined by how much income it produces. For example a garage is more valuable to an investor if someone lives in it and pays rent. Cars on the curb doesn't bother an investor.
3. Home values, driven by the financialization of housing, drives up prices and taxable value so that it is no longer affordable or sustainable for families.
4. Investment driven neighborhoods create a frenzy in which realtors have list of investors waiting for a property to become available. At this point many homes never make it to the market where a family has a chance to buy it.
5. All this makes it VERY difficult for a family to get housing in a college neighborhood that is zone friendly for investors.

I watched this scenario play out before my very eyes. It is extremely sad. If the mayor thinks this new zoning will open up more housing for families he is wrong. It will do the opposite. Most of the homes we tried to buy have become college rentals (while new dorms are below capacity) and others became air bnbs. The price range we tried to buy was from \$200,000 to \$750,000. In fact the one at \$750,000 now rents for \$450 a night.

Kelli McNaughton

From: [ERIC MECHENBIER](#)
To: [City of Albuquerque Planning Department](#)
Subject: IDO support letter
Date: Sunday, November 27, 2022 12:08:52 PM
Attachments: [CABQ Environmental IDO support letter 20221127 em.pdf](#)

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

Hello! Please find attached my letter of support for the upcoming IDO changes and let me know if you have any questions.

Thanks,

E

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ERIC MECHENBIER, MBA

Owner and CEO | MechenbierIT

☐ 505-228-0221 ☐ 801-228-0914

☐ eric@mechenbierit.com

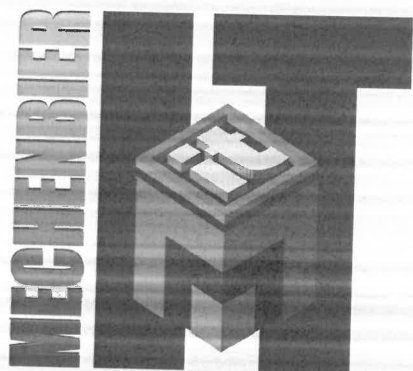
☐ 11024 Montgomery Blvd. NE #121 Albuquerque, NM 87111

☐ [https://ddec1-0-en-](https://ddec1-0-en-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.MechenbierIT.com&umid=14094d94-289d-45cd-bd49-091f768d0881&auth=307405480ca3e49a8b1deb4e49ca5cd244e7e096-4f648d51483bb4e37dae78956725f7e4fd9e4600)

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

To whom it may concern:

As a multiple business owner and real estate investor, I believe allowing higher density developments in the City of Albuquerque is a positive thing for our City and State.

I support the IDO changes allowing two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing the kitchen requirements.

Please consider supporting these changes as well.

Sincerely,

ERIC R. MECHENBIER, MBA

ERIC R.
MECHENBIER,
MBA

C E O

CONTACT

505.228.0221

MechenbierIT.com

ERIC@MechenbierIT.com

From: [Ian Mentken](#)
To: [City of Albuquerque Planning Department](#)
Subject: In favor of expanded ADU availability
Date: Monday, November 28, 2022 2:09:26 PM

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

To the Albuquerque Environmental Planning Commission,

I wish to express my strong support for expanding the availability of ADUs. I recently was forced out of my apartment in Huning Highland, my home for ten years, due to an excessive spike in rent and was lucky to find an affordable ADU to rent in the North Valley. Due to the rarity of such options currently I know there are legions who have not been as lucky as me and are either paying rent beyond their means or were forced into the streets. ADUs are not the only solution to the current housing crisis, but expanding their availability should provide affordable options that heretofore had not existed, and will provide a revenue stream for landlords as well, many of whom may themselves be struggling to pay their mortgage, or are on a fixed income and finding it hard to make ends meet.

I also wish to express support for the option to convert ADUs into a primary residence by relaxing land division regulations, thus allowing landlords to sell their ADUs as separate property. Many, including myself, have been priced out of the home buying market and remain vulnerable to the wildly fluctuating rental market. Ultimately homeownership is the main means of not only creating housing stability but also building equity. While options like small homes or ADUs may not see the same increase in value as traditional homes, having some equity is better than the alternative.

Kind regards,

Ian Mentken
Resident, North Valley

From: [Amelia Milazzo](#)
To: [City of Albuquerque Planning Department](#)
Cc: [Bruce Gardner](#)
Subject: Objection to proposed amendments to IDO
Date: Saturday, November 19, 2022 9:12:53 PM

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

Mr. MacEachen-

I am writing to register my strong opposition to the hasty amendments to the IDO. I am a lifetime Albuquerque resident and support measures to ensure our sustainability and housing affordability however, I find this amendment to be ill conceived and will usher in a number of unintended consequences which are counterproductive to support for a safe and vibrant community. My primary opposition is to provisions that would allow duplexes and ADUs to be created in R1 zones without a request process. Much of this opposition is based on personal experience with some of our most characteristic neighborhoods.

I lived in Nob Hill for almost twenty years, drawn to the tree-lined streets, walkability and sense of community. Over the years, as rental prices increased, the neighborhood began to transition to rentals. High rental rates were driven in large part by the proximity to the University. The renters were respectful residents of the neighborhood, but they were not personally invested in the home they were living in nor the long-term future of the neighborhood. The landscapes were not maintained. Trees that had survived half a century died for lack of water. Property owners seemed to see little profit in maintaining the homes. When it became clear that the neighborhood had reached a tipping point, I sold the home I loved and moved to Spruce Park seeking the type of neighborhood that Nob Hill had once been. This amendment will create a similar evolution for all of the neighborhoods surrounding the University and other areas of concentrated employment. Historic homes will be divided into duplexes with an ADU at the rear as they come up for sale. Much of the character of Albuquerque's older neighborhoods will be irretrievably lost.

The argument that such a large percentage of the city is R1 zoned implies that this will impact all areas equally and that is overly simplistic even to someone who has no background in city planning. All of the single family homes in central neighborhoods will be lost to rental properties and the developments on the periphery of our city that are stretching our resources will see little impact. One need only look at larger cities like Oakland to see how this has played out.

It may also be cynical of me but this seems to be introduced very quietly during a holiday period where attentions are elsewhere. This is a tactic often used in political situations and does not engender much trust in the process. I do support residential infill and increased population density but it can be achieved in other ways. I do support many of the other provisions of the amendment:
Increased mixed-use zoning

Removal of height restrictions

Conversion of commercial buildings and motels to residential housing

New construction of multi-unit housing on vacant lots

At the heart of it all, my plea is an emotional one. Please do not endanger these fragile neighborhoods that are as much about roots and relationship as they are about roofs over our heads when other more effective solutions are available.

Kind Regards-

Amelia Milazzo

From: [Steve Miller](#)
To: [City of Albuquerque Planning Department](#)
Subject: Proposed IDO Changes-- PLEASE ALLOW ADU'S EVERYWHERE!
Date: Saturday, November 26, 2022 2:18:40 PM

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

Dear Commissioners,
Albuquerque is in dire need of affordable housing, and ADU's are a great strategy that cities across the country are using to add density without changing the appearance or feel of neighborhoods. They provide flexibility and freedom for homeowners while increasing their home value, which brings up the neighborhood rather than decreasing it, as those opposed to them claim. There's so much valuable research available showing how casitas/ADU's benefit communities that it should be an easy yes.

Please vote yes to the proposed changes to the IDO, including the reduction on required parking which also keeps our city sprawling and less sustainable.

Thanks,

s t e v e m i l l e r



LivLab Studios
www.livlabstudios.com
505.379.7819

From: [Schultz, Shanna M.](#)
To: [Lehner, Catalina L.](#); [City of Albuquerque Planning Department](#)
Subject: FW: Change in Residential zoning
Date: Wednesday, November 30, 2022 2:10:55 PM

Please see attached public comment for the proposed housing changes. Please add to the EPC record

Shanna Schultz, AICP | Council Planning Manager
Albuquerque City Council Services
Office: (505) 768-3185

-----Original Message-----

From: Janis <jrn224@yahoo.com>
Sent: Friday, November 18, 2022 8:46 AM
To: Ortega, Crystal L. <COrtega@cabq.gov>
Subject: Change in Residential zoning

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

I am following up on info through KHNA. I don't approve of changes in R-1 zoning allowing Accessory Dwelling Unit especially without any public awareness.

If more housing is needed it might be a good idea to look into abandoned properties and/or redevelopment of vacant land..

The fact that Emergency changes being dropped on City prior to holidays also is not appropriate or appreciated.
Janis Mount

Sent from my iPad

From: [Schultz, Shanna M.](#)
To: [Lehner, Catalina L.](#); [City of Albuquerque Planning Department](#)
Subject: FW: Change in Residential zoning
Date: Wednesday, November 30, 2022 2:10:55 PM

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The fact that Emergency changes being dropped on City prior to holidays also is not appropriate or appreciated.
Janis Mount

Sent from my iPad

From: [Brian Needham](#)
To: [City of Albuquerque Planning Department](#)
Subject: Upcoming IDO Changes
Date: Monday, November 28, 2022 9:11:18 PM

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

Environmental Planning Commission
City of Albuquerque

Re: Upcoming IDO Changes

To whom it may concern:

As a business owner and real estate investor, I believe allowing higher density developments in the City of Albuquerque is a positive thing for our City and State.

I support the IDO changes to allow two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing the kitchen requirements.

Please consider supporting these changes.

Sincerely,
Brian Needham

Best regards,
Brian Needham
Cell: 832-247-2840
[Email: brian_needham05@yahoo.com](mailto:brian_needham05@yahoo.com)

From: [Tim Nisly](#)
To: [City of Albuquerque Planning Department](#)
Subject: IDO Changes letter of support
Date: Saturday, November 26, 2022 11:35:17 AM
Attachments: [Nisly EPC letter of IDO support.pdf](#)

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

Good morning! I'd like to submit this comment in support of the IDO changes for the Dec EPC hearing. Thank you!

-Tim

Tim Nisly
101 Property, LLC
(O) 505.600.7175
(C) 505.750.8466

www.101prop.com

Full-Service Investment-Grade Realtor

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Environmental Planning Commission
City of Albuquerque

Re: Upcoming IDO Changes

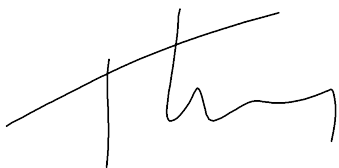
To whom it may concern:

I'd like to express my support for the upcoming IDO changes that allow two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing the kitchen requirements.

As a member of the City's Small Business Regulatory Advisory Committee, a board member of the Barelas Community Coalition, a real estate investor, business owner, and proud citizen of Albuquerque, I believe these changes will position our City and neighborhoods for healthy growth long into the future.

Please consider supporting these changes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Nisly', with a long horizontal stroke extending from the top left.

Tim Nisly

Owner, 101 Property, LLC

From: [Emily Ochmanek](#)
To: [City of Albuquerque Planning Department](#)
Subject: O-22-54
Date: Saturday, November 19, 2022 8:32:07 PM

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

Greetings Mr. MacEachen,

I am a resident of Spruce Park, and I have some reservations about Council Bill No O-22-54.

To begin with, the very short time frame does not allow sufficient time to review/analyze the range of potential unintended /negative consequences associated with the proposal.

As our neighborhood is situated across the street from UNM, these proposed changes are likely to have an outsized effect; additional investor-owned student rentals will likely destabilize our fragile historic neighborhood. Existing issues with noise and litter related to student rentals need to be addressed before considering any sort of expansion.

It seems like high-density housing, such as that being built to the south of our neighborhood and along Central, is the most efficient way to increase the number of residences – without sacrificing our stable and historic neighborhood.

Thank you for your consideration of these concerns.

Kind regards,

Emily Ochmanek

From: [Abi Olvera](#)
To: [City of Albuquerque Planning Department](#)
Subject: Letter in Support of IDO on Affordable Homes, Density, Decreasing Parking
Date: Saturday, November 26, 2022 7:15:34 PM

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

Hi!

I'm a member of Indivisible ABQ, BikeABQ, and my neighborhood association (Twin Parks).

I am writing to express my support for the proposed changes to the zoning code that would allow for more density and mixed-use development citywide. These changes are necessary in order to create more affordable housing options and to create more walkable and bikeable neighborhoods. We need to replace our huge oversized parking lots with vibrant neighborhoods, walkable streets, homes, and small businesses.

Albuquerque is a city with a lot of potential, but we have been held back by an outdated zoning code that doesn't reflect the needs of our 21st century residents. By allowing for more density and mixed-use development, we can create the kind of vibrant, livable city that we all want to live in.

Thank you for your consideration of these important changes.

Abi Olvera

Abi Olvera

Tel: (915) 491-9744



Sent via [Superhuman](#)

From: [Amy Parkman](#)
To: [City of Albuquerque Planning Department](#)
Subject: Proposed updates to the Zoning Code
Date: Monday, November 21, 2022 2:45:31 PM

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

To Mr. Timothy MacEachen

I am a resident of the Spruce Park Neighborhood which is on the west boundary of UNM. I am concerned that the proposed changes to the zoning code will negatively affect our neighborhood which because of its proximity to campus will cause an increase in investor owned student rentals which have not been beneficial to the quality of our neighborhood. The short time frame for a hearing on this proposed change does not allow enough time for your commission to thoughtfully study the real effects of these changes on our fragile historic neighborhood.

Thank you for considering my concerns
Amy Parkman

From: [Sharla Parsons](#)
To: [City of Albuquerque Planning Department](#)
Subject: Supporting changes to the IDO
Date: Wednesday, November 30, 2022 11:59:58 AM

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

Hello. I am writing to send my letter of support for the changes outlined in O-22-54 to our IDO that would allow for duplexes on R-1 lots, allow for accessory dwelling units on R-1 lots, exempting non-residential conversions from the definition of kitchen to allow for hotel/motel conversions to residential units, and loosen the parking requirements for affordable and middle level housing developments.

As a residential resale Realtor, I have seen the impacts of a housing shortage first hand and I think it's time we take this crisis seriously and remove the barriers to expansion that our Albuquerque community members so desperately need.

Please let me know if you have any questions. Thank you.
Sincerely,

Sharla Parsons

Associate Broker- Keller Williams Albuquerque

www.SharlaParsonsRealEstate.com

505-506-5579

sharla.parsons@gmail.com

Pronouns: She/Her/Hers

<https://www.rti.org/why-pronouns-matter>

WIRE FRAUD! During your representation by Keller Williams Realty you will NEVER be asked, via email, to wire or send funds to ANYONE, not even a title company. DO NOT COMPLY WITH EMAIL INSTRUCTIONS TO WIRE FUNDS!

ATTENTION! The information contained in this email may be CONFIDENTIAL and PRIVILEGED. It is intended for the individual or entity named above. If you are not the intended recipient, please be notified that any use, review, distribution or copying of this email is strictly prohibited. If you have received this email by error, please delete it and notify the sender immediately. Thank you!

From: [paxtonm](#)
To: [City of Albuquerque Planning Department](#)
Subject: strong opposition to O-22-54
Date: Monday, November 28, 2022 2:28:01 PM

[EXTERNAL] Forward to phishing@cabq.gov and delete if an email causes any concern.
Mr. Timothy MacEachen,
Chair, Environmental Planning Commission

Dear Mr. MacEachen:

I strongly oppose O-22-54, Mayor Keller's "transformative zoning," which is attached to current updates to the Albuquerque Integrated Development Ordinance. While the ordinance promises to be detrimental over the entire city, the following remarks focus on its damage to Albuquerque homeowners. The purchase of a home anywhere is one of the biggest financial investments an individual can make. Ideally, the property is a tangible reward for employment, providing a sanctum from external pressures and bringing pleasures through gardening, entertaining, and similar activities. It also gives the simple yet essential ability to have the quiet necessary for restful nighttime sleep in preparation for the next workday. Of particular concern to me is the future of my neighborhood, Spruce Park, which is listed on the National Register of Historic Places (compiled by the National Park Service).

Mayor Keller's "transformative zoning," which would triple the permissive density of neighborhoods, was announced as a solution to homelessness due to the shortage of affordable housing in Albuquerque. However, it would authorize practices that will destroy the property rights of homeowners who have long worked to maintain the desirability of Spruce Park. While this neighborhood is especially vulnerable now, the shifting future interests of investors could eventually ruin any other part of the city as well. Keller's proposal is a disastrous abuse of power in that it relies on hasty updates to the IDO to eliminate protections for neighborhoods that have existed since the beginning of zoning in Albuquerque. These objectives and zoning regulations were thoughtfully developed by professional planners and citizens over many years, and they have served as a primary guiding principle for major financial decisions. Moreover, Keller's scheme is irresponsible because there has been no analysis to identify all the factors that contribute to this complex problem, nor does it even show that it would provide housing for those in need.

Spruce Park is one of the places that is entitled to special protection under the Albuquerque and Bernalillo Comprehensive Plan (ABC Comprehensive Plan — City of Albuquerque (cabq.gov)), which was adopted by the City Council in March 2017 after a 2-year planning effort. The ABC is "the City's Rank 1 policy document that guides planning throughout the city/county area." One of its purposes is to "identify priority areas to protect and enhance, such as the city's diverse and vibrant neighborhoods and unparalleled network of parks, open space, and trails." Chapter 11, entitled Heritage Conservation, explains that the concept "refers to a set of actions that keep the cultural resources we have inherited from our predecessors safe from harm, decay, or loss and to preserve those resources from damaging change." Among its guiding principles are "Development that protects and leverages cultural heritage reinforces community values." and "Placemaking that leverages unique historic assets and places creates value for property owners and increases revenues for businesses and governments." (CompPlan-Chapter11.pdf (cabq.gov)).

My 100-year-old neighborhood helps provide a sense of the origins of Albuquerque. The residences here were built mostly between World War I and World War II from various designs inspired by the architecture that

was seen by soldiers in Europe. It is one of the last housing areas to predate tract projects. My husband and I have worked over decades to maintain the historic value of this home; the threatened destruction of this part of the city's cultural legacy that should be protected by the Comprehensive Plan is personally very distressing. Furthermore, it will bring financial loss by making the land use comparable to parts of the south campus area. As the following comments—made by Susan Beard on June 21, 2022—show, property values in Spruce Park are much higher than those of other neighborhoods near UNM.

I have been a full time Realtor for 40 plus years and specialize in selling residential real estate the neighborhood surrounding the University of New Mexico.

For 40 years, I have found that homes in the Spruce Park area command some of the highest prices in the UNM area because it is architecturally and historically

unique. Buyers prize the diversity of historic architectural styles and attention to detail on the façade and interior of most homes. The Spruce Park area can

not be replicated in any other part of the UNM area. The only close completion is downtown in the Huning Castle area by the Albuquerque Country Club. When

appraisers appraise homes in the bulk of the UNM area, they normally do not seek comparable sales in the Spruce Park area because the Spruce Park area commands

much higher values and the architectural detail is not present in post-war construction.

The vulnerability of Spruce Park stems from its location west of University Boulevard, directly across from the University of New Mexico.

Because of this proximity, we are already seen by some investors as a place to be converted into rental apartments. For example, a unit with inadequate setback has been constructed in the back yard of the single-family residence at 1630 Roma Ave., NE. Although a building permit was issued for an accessory structure, a “yoga studio,” it was clear from the beginning that the building would be a two-bedroom apartment. The Zoning Enforcement Office did not respond to numerous complaints from neighbors before its completion because of the lack of officers. Although use of the building as an accessory living quarter was denied during zoning hearings, there has been no enforcement of the action. When an area hosts a largely temporary population, the sense of social community is lost. The short-term residents often don't care about whether neighbors can sleep at night, or about the long-term future of the area. The general decline in the quality of life destabilizes the neighborhood, driving owner occupants away. In other words, the neighborhood is given to investors. It is abhorrent that I would be deprived of the enjoyment of my home and suffer financial loss because the City of Albuquerque has abandoned the protections granted by the Comprehensive Plan, which is published as a legal code, (<https://ddec1-0-en-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fodelibrary.amlegal.com%2fcodes%2falbuquerque%2flatest%2falbuquido%2f0%2d0%2d0%2d1&umid=093176ec-8c1c-497a-bbcb-182e0ffc30bb&auth=307405480ca3e49a8b1deb4e49ca5cd244e7e096-c822e68e9efeefbb43964172740475286942c1cc>) and serves as a contract between citizens and the City.

While Mayor Keller's idea may be well intentioned, it is ill conceived. Its implementation would be extremely detrimental to my neighborhood and to Albuquerque. Therefore, I urge you and the other EPC members to reject O-22-54, “transformative zoning.”

Sincerely,
Merideth Paxton, PhD

From: [Walter Putnam](#)
To: [City of Albuquerque Planning Department](#)
Subject: Upcoming IDO Changes
Date: Saturday, November 26, 2022 1:03:33 PM

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

Environmental Planning Commission
City of Albuquerque

Re: Upcoming IDO Changes

To whom it may concern:

As a long-time Albuquerque resident and real estate investor, I believe allowing higher density developments in the City of Albuquerque is a positive thing for our City and State.

I support the IDO changes to allow two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing the kitchen requirements.

Please consider supporting these changes.

Sincerely,

Walter Putnam
4 Tennis Ct, NW
Albuquerque, NM 87120

--

*"The more I learn about people, the more I like my dog."
- Mark Twain*

From: [Rader, Kelsey](#)
To: [City of Albuquerque Planning Department](#)
Cc: [Renz-Whitmore, Mikaela J.](#); [Lee, Albert](#)
Subject: CABQ Sustainability Office EV Parking Letter of Support
Date: Monday, November 28, 2022 11:02:37 AM
Attachments: [image001.png](#)
[Ann Arbor ORD-22-13 Parking Standards Chapter 55.pdf](#)
[Sustainability Office EV Parking Letter of Support.pdf](#)

Good Morning,

Please find attached the City of Albuquerque Sustainability Office's Letter of Support for EV Parking IDO updates. This letter is addressed to Mr. Timothy J. MacEachen the Chair of the Environmental Planning Commission.

Best,

Kelsey Rader



KELSEY RADER, J.D.

Sustainability Officer | environmental health department

o 505.768.2739

c 505.250.3433

pronouns: she/her

ORDINANCE NO. ORD-22-13

First Reading: July 18, 2022
Public Hearing: August 15, 2022

Approved: August 15, 2022
Published: August 25, 2022
Effective: September 4, 2022

AN ORDINANCE TO AMEND SECTIONS 5.16.1.A, 5.16.2.A, 5.16.2.B, 5.16.3.J, 5.16.3.P, 5.16.4.B, 5.16.6.C, 5.16.6.G, AND TO REPEAL AND REPLACE SECTION 5.19 OF CHAPTER 55 (UNIFIED DEVELOPMENT CODE) OF TITLE V OF CODE OF THE CITY OF ANN ARBOR – (AMEND PARKING STANDARDS)

The City of Ann Arbor Ordains:

Section 1: That Section 5.16.1.A of Chapter 55 Unified Development Code, be amended as follows:

A. Residential Occupancy

1. Purpose

This section is intended to reasonably regulate the number of Persons who can live in a residential Dwelling Unit. The City finds that occupancy limits are needed to provide density control; preserve and enhance residential neighborhoods as stable, quiet places for citizens to live and raise children; protect safety and welfare; and maintain property values. Such limits are also needed to ensure that there are adequate public and private facilities including adequate off-street parking, utilities, and adequate Lot Area to accommodate the residents of each Dwelling Unit without impairing the character of the neighborhood. The City also finds there are a number of residential living arrangements other than the traditional biological Family arrangement. This section is intended also to accommodate those alternative living arrangements.

2. Limits on Occupancy of Dwelling Unit

A Dwelling Unit may be occupied by one of the following Family living arrangements:

- a. One or more Persons related by blood, marriage, adoption, or guardianship living as a single Housekeeping Unit, in all districts.
- b. A maximum of four Persons plus their Offspring living as a single Housekeeping Unit, in all districts.
- c. A maximum of six Persons living as a single Housekeeping Unit in Multiple-Family and mixed use districts only.
- d. A Functional Family living as a single Housekeeping Unit that has received a Special Exception Use permit pursuant to Section 5.29.5.

3. Additional Standards for Functional Family

In addition to meeting the definition in Article VIII of this chapter and the Special Exception Use standards of Section 5.29.5, a permit for a Functional Family is subject to the following standards and regulations:

~~a. Required Parking~~

~~Two off-street Parking Spaces must be provided. Additional Parking Spaces may be required by the Planning Commission if any of the following conditions are met:~~

- ~~i) The property is located more than 300 feet from a bus stop.~~
- ~~ii) Street parking available for visitor parking is limited.~~
- ~~iii) The Applicant intends to park more than two vehicles regularly on the Site and there is limited area available for tandem parking in a Driveway.~~

~~b. Parking Plan~~

~~In order for the Planning Commission to determine if adequate parking will be provided, the Applicant must submit a plan indicating the location of proposed off-street parking and an analysis of public parking and transit facilities provided within a 300-foot radius of the parcel.~~

~~c. Deferment of Required Parking~~

~~The Planning Commission may defer the provision of up to 40% of the required spaces if the required spaces are shown on the approved plan for the permit. If the Building Official determines that some or all of the deferred Parking Spaces are needed, these spaces must be installed. Any Person aggrieved by the Building Official's determination may appeal as provided in Section 5.29.12.~~

~~d.a. Limited to Approved Functional Family Type~~

The permit shall apply only to the Functional Family type which obtained the permit and shall be limited to the number of Persons specified in the permit.

~~e.b. Contact Person~~

A contact Person shall be provided who will act as head of household in relating to the City.

4. Variance for Handicapped Person

The Zoning Board of Appeals may grant a variance from the standards of this section if it is reasonably necessary to give a handicapped Person (as defined in 42 USC Section 3602) equal opportunity to use and enjoy a dwelling.

5. Exceptions

The occupancy limits of this section do not apply to Group Housing, Fraternity or Sorority Houses, Student Cooperative Housing, Emergency Shelters, or convalescent homes.

Section 2: That Sections 5.16.2.A of Chapter 55 Unified Development Code, shall be amended as follows:

A. Adult Day Care Center

1. All Single-Family and Two-Family Residential Zoning Districts

In addition to the Special Exception Use standards in Section 5.29.5, the following standards apply:

- a. The parcel must have a minimum of 7,500 square feet of Lot Area.
- ~~b. — One off-street Parking Space for each caregiver required to staff the facility at its state licensed capacity must be provided.~~
- ~~c. — Adequate off-street or on-street Parking Spaces available for drop off and pick up use within 250 feet of the Adult Day Care Center parcel shall be provided on the site plan. The number of drop-off and pick-up spaces shall be two plus one additional space for each 20 adults that the facility is licensed to care for.~~
- ~~d.b.~~ b. Occupancy may not be increased without amending a previously approved Special Exception Use permit.

B. Child Care Center

1. All Single-Family and Two-Family Residential Zoning Districts

In addition to the Special Exception Use standards in Section 5.29.5, the following standards apply:

- a. The parcel must have a minimum of 7,500 square feet of Lot Area.
- ~~b. — One off-street Parking Space for each caregiver required to staff the facility at its state licensed capacity must be provided.~~
- ~~c. — Adequate off-street or on-street Parking Spaces available for drop off and pick up use within 250 feet of the Child Care Center parcel must be provided on the site plan. The number of drop-off and pick-up spaces shall be two plus one additional space for each 20 children the facility is licensed to care for.~~
- ~~d.b.~~ b. Occupancy may not be increased without amending a previously approved Special Exception Use permit.

Section 3: That Section 5.16.3.J of Chapter 55 Unified Development Code, be amended as follows:

J. Outdoor Recreation

1. All Residential Zoning Districts

- a. The only Outdoor Recreation use allowed in residential zoning districts are accessory Outdoor Residential Recreation Facilities, subject to the Special Exception Use standards in Section 5.29.5 and the following standards. Membership shall be open to residents of the subdivision or

residential development in which the Outdoor Residential Recreation Facility is located.

- b. Any permanent addition, other than a Fence, to an outdoor recreation use, including an accessory Outdoor Residential Recreational facility shall constitute a modification of the use that requires Special Exception Use approval.
- c. For purposes of this section, any new accessory Outdoor Residential Recreational facility or permanent addition to an existing accessory Outdoor Residential Recreational facility will require a scaled drawing showing the existing and proposed Structures and improvements on the Site, instead of a site plan, as part of the Special Exception Use application.
- d. A Conflicting Land Use Buffer per Section 5.20.4 shall be provided to screen the facility from adjacent residential properties.
- e. ~~One off-street Parking Space per 200 square feet of Floor Area of the club Building shall be provided.~~

Section 4: That Section 5.16.3.P of Chapter 55 Unified Development Code, be amended as follows:

P. Transit Corridor Development

The specific standards below are intended to ensure development in the TC1 district creates places where people can live, work, socialize, play and shop in well-designed, comfortable places that support active, sustainable, city living.

TABLE 5.16-2: TRANSIT CORRIDOR DEVELOPMENT USE SPECIFIC STANDARDS			
		LOT WIDTH UP TO 250 FT.	LOT WIDTH 250 FT. AND MORE
BUILDINGS	MIXED USE BUILDING	<ol style="list-style-type: none"> 1. First story must be minimum of 15 ft. in height. 2. Minimum 60% of the first floor facing any sidewalk between 2 and 9 ft in height must be clear windows and doors that allow views of interior space or product display areas. The bottom of any window or product display area used to satisfy the transparency standard must not be more than 3 ft above the adjacent sidewalk. 3. Buildings at the front setback must have a functional entrance door facing the transit corridor. Entrances at corners are acceptable. 	<ol style="list-style-type: none"> 1. First story must be minimum of 15 ft. in height. 2. Maximum 360 ft. diagonal. 3. Minimum 60% of the first floor facing any sidewalk between 2 and 9 ft in height must be clear windows and doors that allow views of interior space or product display areas. The bottom of any window or product display area used to satisfy the transparency standard must not be more than 3 ft above the adjacent sidewalk. 4. Buildings at the front setback must have a functional entrance door facing the transit corridor. Entrances at corners are acceptable. 5. Buildings more than 750 feet from the transit corridor may be 1 story.
	TOWNHOUSE/ APARTMENT BUILDING	<ol style="list-style-type: none"> 1. Street-facing door and stoops required for Townhouses. 2. Apartment Buildings must have a functional entrance door facing the transit 	<ol style="list-style-type: none"> 1. Street facing door and stoop required for Townhouses. 2. Apartment Buildings must have a functional entrance door facing the transit

TABLE 5.16-2: TRANSIT CORRIDOR DEVELOPMENT USE SPECIFIC STANDARDS

		LOT WIDTH UP TO 250 FT.	LOT WIDTH 250 FT. AND MORE
		<p>corridor. Entrances at the corner of the Building are acceptable.</p> <p>3. Garage doors may not face any street.</p>	<p>corridor. Entrances at the corner of the Building are acceptable.</p> <p>3. Garage doors may not face any street.</p> <p>4. Maximum 360 ft. diagonal.</p>
BUILDING FRONTAGE	MIXED USE BUILDING	Minimum frontage equal to Lot Width less 30 feet or 45 feet when adjacent to residential zoning	Minimum 75% frontage
	TOWNHOUSE/ APARTMENT BUILDING	Minimum frontage equal to Lot Width less 30 feet or 45 feet when adjacent to residential zoning	Minimum 70% frontage
SITE	ALL BUILDINGS	<p>1. Buildings must have a public or private sidewalk adjacent to all sides with main entrances.</p> <p>2. When the site is more than 62,500 sq. ft., the site must be designed as blocks 250 feet on each side or as near as practical given the site shape, with sidewalks, plazas, or drives separating the blocks.</p>	<p>1. Buildings must have a public or private sidewalk adjacent to all sides with main entrances.</p> <p>2. When the site is more than 62,500 sq. ft., the site must be designed as blocks 250 feet on each side or as near as practical given the site shape, with sidewalks, plazas, or drives separating the blocks.</p>
	MIXED USE BUILDINGS	The portion of the first story within 100 feet of an intersection of public rights-of-way must be occupied by nonresidential use.	The portion of the first story within 100 feet of an intersection of public rights-of-way must be occupied by nonresidential use.
	TOWNHOUSE/ APARTMENT BUILDINGS	Not permitted within 100 feet of an intersection of public rights-of-way	Not permitted within 100 feet of an intersection of public rights-of-way.
ACCESS AND CIRCULATION	MIXED USE BUILDINGS	No more than 1 curb cut for a two-way driveway or 2 curb cuts for a one-way driveway per Lot.	No more than 2 curb cuts per Lot.
	TOWNHOUSE/ APARTMENT BUILDINGS	No more than 1 curb cut for a two-way driveway or 2 curb cuts for a one-way driveway per Lot.	No more than 2 curb cuts per Lot.
OFF-STREET PARKING	ALL BUILDINGS	<p>1. No minimum off street vehicle parking for any land use.</p> <p>2. 1. Maximum vehicle parking standards; required bicycle spaces and EV parking spaces as provided in Table 5.19-1 shall apply.</p>	<p>1. No minimum off street vehicle parking for any land use.</p> <p>2. 1. Maximum vehicle parking standards; required bicycle spaces and EV parking spaces as provided in Table 5.19-1 shall apply.</p>
PARKING LOT	ALL BUILDINGS	<p>1. Located in side or rear yard only. No placement exception provided in Section 5.19.8.B may be applied in the TC1 district.</p> <p>2. In addition to the maximum parking standards provided in Section 5.19.3, the portion of the site devoted to Vehicular Use Area may not exceed area of Buildings(s) footprint. If the Vehicular Use Area cannot accommodate the maximum number of permitted spaces, the remaining amount must be provided in a Parking Structure or within a Building.</p>	<p>1. Located in side or rear yard only. No placement exception provided in Section 5.19.8.B may be applied in the TC1 district.</p> <p>2. In addition to the maximum parking standards provided in Section 5.19.3, the portion of the site devoted to Vehicular Use Area may not exceed 125% of area of Building(s) footprint. If the Vehicular Use Area cannot accommodate the maximum number of permitted spaces, the remaining amount must be provided in a Parking Structure or within a Building.</p>

Section 5: That Section 5.16.4.B of Chapter 55 Unified Development Code, be amended as follows:

B. Nonprofit Corporations

1. All Residential Zoning Districts

- a. Parcels must have a minimum of 80,000 square feet of Lot Area.
- b. The Principal Building must contain a minimum of 3,000 square feet of Floor Area, excluding Basements or cellars, constructed prior to January 1, 1988.
- c. There shall be no more than one employee for each 300 square feet of Floor Area, constructed prior to January 1, 1988, excluding Basements or cellars.
- ~~d. Off-street parking in the amount of one space for each 300 square feet of Floor Area, constructed prior to January 1, 1988, excluding Basements or cellars, shall be provided in accordance with the standards of Section 5.19~~
- e.d. One Dwelling Unit within the existing Structure may be approved as part of this Special Exception Use approval.
- f.e. The use will result in preservation of Open Space and/or historic Sites or Structures.
- g.f. The nature of the use will not be of such intensity as to disrupt the peaceful enjoyment of the neighborhood; specifically, the use shall not generate more than 20 Office-related vehicle trips (excluding employee related trips) in any one day from the Site.
- h.g. No Building or other use of land, except landscaped areas, shall be situated within 30 feet of any adjacent residential property.

Section 6: That Section 5.16.6.C of Chapter 55 Unified Development Code be amended as follows:

C. Drive-Through Facility

1. General

1. A Drive-Through Facility may not be located between a street and the Principal Building.
2. Placement of the Drive-Through Facility and its queuing lanes may not impair pedestrian circulation or general vehicular circulation on and off the Site.
3. Driveways located in the Front Yard that serve Drive-Through Facilities shall meet the following standards:
 - a. The width of the Driveway shall not exceed 12 feet in width.

- b. A minimum five foot wide raised Sidewalk shall be provided across the Driveway connecting the Public Right-of-Way to the main entrance of the Building. The portion of the Sidewalk that crosses the Driveway shall be designed in a manner that clearly identifies the pedestrian crossing.
- c. At least four bollards shall be provided near each corner where the raised Sidewalk crosses the Driveway to alert drivers of this pedestrian crossing.
- d. Right-of-Way screening shall be provided between the Right-of-Way and Driveway in a manner that screens the Driveway from view from the Right-of-Way but does not obscure the view between the motorist and pedestrians approaching the cross walk.
- e. For at least one Front Lot Line, if more than one Driveway is proposed from the same Street, the Driveways may not be connected in the Front Yard.

~~1.2.~~ **O District**

- a. Drive-Through Facilities are only permitted for financial uses, and are subject to Special Exception Use approval pursuant to Section 5.29.5.
- b. ~~— The Drive-Through Facility may not be located between a street and the Principal Building, and the vehicular circulation to enter and exit the facility may not impair the general vehicular circulation on the Site or the pedestrian circulation on and off the Site.~~

~~2.3.~~ **D1, D2, and C2B Districts**

- a. Drive-Through Facilities are permitted for any Principal Use of property, subject to Special Exception Use approval pursuant to Section 5.29.5 .
- b. ~~— In the C2B district, the Drive-Through Facilities may not be located between a street and the Principal Building, and the vehicular circulation to enter and exit the facility may not impair the general vehicular circulation on the Site or the pedestrian circulation on and off the Site.~~

~~3.4.~~ **C3 District**

- a. ~~The Drive-Through Facilities may not be located between a street and the Principal Building, and the vehicular circulation to enter and exit the facility may not impair the general vehicular circulation on the Site or the pedestrian circulation on and off the Site.~~ Drive-Through Facilities are permitted for any Principal Use of the property, subject to the Special Exception Use approval pursuant to Section 5.29.5.

Section 7: That Section 5.16.6.G of Chapter 55 Unified Development Code, shall be amended as follows:

G. Group Day Care Home

1. All Residential Zoning Districts

- a. Shall be licensed by the State of Michigan Department of Licensing and Regulatory Affairs.
- b. A zoning permit shall be obtained from the PDSU.
- c. Shall be located on a Lot with at least 5,000 square feet of Lot Area.
- ~~d. Shall provide at least one off-street Parking Space for each caregiver not living in the dwelling.~~
- ~~e. Shall show that two off-street or on-street Parking Spaces are available within 250 feet of the parcel for drop off and pick up of children.~~

Section 8. That Section 5.19 of Chapter 55 Unified Development Code be repealed and replaced with the following:

5.19 Parking Standards

5.19.1 Applicability

- A.** All off-street parking facilities shall comply with the provisions of this section.
- B.** Bicycle parking required by this section shall be provided for new Buildings, building alterations that increase Floor Area, or when a use changes to a use with a higher minimum parking requirement per Table 5.19-1.
- C.** Vehicle parking required by this section shall be provided for new Buildings, and Building Alterations that increase Floor Area.
- D.** Electric Vehicle Parking required by this section shall be provided with the construction of any new Parking Spaces in a Parking Lot, Parking Structure, garage or carport.

5.19.2 Required Parking

A. General

1. Each land use listed in Table 5.19-1 shall provide an amount of off-street parking compliant with this section, unless the requirements are modified by another provision of this chapter, in which case the modifications shall apply.
2. No Lot zoned other than "P" shall have parking as its Principal Use, excepting Lots containing approved Parking Lots or Structures in the D1 or D2 districts.

B. Calculating Required Parking

1. The Floor Area above grade within a Principal Building, Accessory Building or Accessory Structure used for vehicle or bicycle parking shall not be included in any required parking calculation.
2. Any fraction of a Parking Space shall be considered a full space.
3. A higher class of Parking Space may be used to provide bicycle or Electric Vehicle parking facilities when more than one class is required by this section.

TABLE 5.19-1 REQUIRED PARKING

USE <i>See Sec. 5.19.3 for Uses in D1, D2, TC1 Districts</i>	MAXIMUM VEHICLE PARKING SPACES (NONE IF BLANK)	MINIMUM BICYCLE PARKING SPACES				MINIMUM EV PARKING SPACES	
		SPACES	CLASS			CLASS	
			A	B	C	EV-C	EV-I
RESIDENTIAL USES (NUMBER OF SPACES/DWELLING UNIT, UNLESS OTHERWISE NOTED)		% OF SPACES PROVIDED					
Household Living							
Adult Foster Care		None	None			None	
Dwelling, Assisted Living		1 / 5	50%		50%	40%	10%
Dwelling, Multi-Family (5 units or more)		1 / 5	50%		50%	90%	10%
Dwelling, Single-Family, Two-Family, Multi-Family (3 or 4 units)		None				See Section 5.19.8.A.1	
Dwelling, Townhouse		1 / 5	50%		50%	100%	
Group Living							
Emergency Shelter		None				30%	5%
Fraternities, sororities, student cooperatives		1 / 2 beds	50%	50%		90%	10%
Group Housing, Guest House		1 / 5 beds	50%	50%		90%	10%
PUBLIC/INSTITUTIONAL USES (NUMBER OF SPACES / SQUARE FOOT, UNLESS OTHERWISE NOTED)		% OF SPACES PROVIDED					
Community and Cultural							
Club Headquarters or Community Center		1 / 1,000			100%	25%	10%
Conference Center		1 / 1,000			100%	40%	10%
Designated Marijuana Consumption Facility	1 / 100	1 / 500		50%	50%		
Museum, Art Gallery	1 / 265	1 / 3,000		50%	50%	30%	5%
Funeral Services		None				None	
Library	1 / 265	1 / 3,000		50%	50%	30%	5%
Park, Recreation and Open Space	None	None				30%	5%
Religious Assembly		1/50 seats or 1/100 ft. of pew			100%	30%	5%
Day Care							

TABLE 5.19-1 REQUIRED PARKING

USE <i>See Sec. 5.19.3 for Uses in D1, D2, TC1 Districts</i>	MAXIMUM VEHICLE PARKING SPACES (NONE IF BLANK)	MINIMUM BICYCLE PARKING SPACES				MINIMUM EV PARKING SPACES	
		SPACES	CLASS			CLASS	
			A	B	C	EV-C	EV-I
Adult Day Care Center, Child Care Center		1 / 10 caregivers		100%		25%	10%
Educational							
Institutions of Higher Learning, Private		5/classroom			100%	40%	10%
School, Private		5 / classroom			100%	40%	10%
School, Trade/Industrial		5 / classroom			100%	40%	10%
Health Care							
Hospital, Nursing Care Facility		1 / 60 beds		100%		40%	10%
COMMERCIAL USES (NUMBER OF SPACES / SQUARE FOOT, UNLESS OTHERWISE NOTED)			% OF SPACES PROVIDED				
Lodging							
Bed and Breakfast		1 / 4 rooms		100%		75%	25%
Hotel		1 / 30 rooms	100%			75%	25%
Recreation, Entertainment, and Arts							
Adult Entertainment Business	1 / 265	1 / 3,000		50%	50%	25%	10%
Artist Studio		1 / 6,000		100%		25%	10%
General Entertainment	1 / 265	1 / 3,000		50%	50%	25%	10%
Indoor Recreation (Athletics, Rinks)		1 / 1,000		100%		25%	10%
Indoor Recreation (Bowling Alley)		1 / 5 alleys			100%	25%	10%
Indoor Recreation (Court Games)		1 / 2,000		100%		25%	10%
Outdoor Recreation (Pools)		1 / 1,000			100%	25%	10%
Outdoor Recreation (Stadiums)		1 space per 100 seats or 200 feet of bench			100%	None	
Outdoor Recreations (Amphitheaters)		1 / 150 seats			100%	None	
Sales							

TABLE 5.19-1 REQUIRED PARKING

USE <i>See Sec. 5.19.3 for Uses in D1, D2, TC1 Districts</i>	MAXIMUM VEHICLE PARKING SPACES (NONE IF BLANK)	MINIMUM BICYCLE PARKING SPACES				MINIMUM EV PARKING SPACES	
		SPACES	CLASS			CLASS	
			A	B	C	EV-C	EV-I
Automobiles, Motorcycles, Recreational Vehicles, Equipment (Sales and Rental)		1 / 3,000		50%	50%	30%	5%
Fueling Station		1 space			100%	30%	5%
Outdoor Sales, Permanent	1 / 265	1 / 3,000		50%	50%	30%	5%
Medical Marijuana Provisioning Center, Marijuana Retailer	1 / 265	1 / 3,000		50%	50%	30%	5%
Restaurant, Bar, Food Service		1 / 750		50%	50%	30%	5%
Retail Sales, General Merchandise, Shopping Centers	Up to 600,000 Sq. Ft.: 1 / 250	1 / 3,000		50%	50%	15%	5%
	More than 600,000 Sq. Ft.: 1 / 235	1 / 3,000		50%	50%	15%	5%
Wholesale, Resale, Building Material and Supplies		1 / 6,000			100%	10%	5%
Service and Repair							
Automobile, Truck, Construction Equipment Repair		1 space			100%	15%	5%
Contractors, General Construction, and Residential Building		1 / 3,000	30%		70%	10%	10%
Laundry, Cleaning, and Garment Services	1 / 265	1 / 3,000		50%	50%	15%	5%
Parking Lot		1 / 10 parking stalls	30%		70%	10%	10%
Parking Structure		1/10 parking stalls	30%		70%	40%	10%
Personal Services		1 / 750	100%			30%	5%
Vehicle Wash, Automatic		1 space	100%			15%	10%
Vehicle Wash, Self-serve		1 space	100%			None	
Veterinary, Kennels and Animal Boarding	1 / 250	1 / 3,000	30%		70%	10%	10%

TABLE 5.19-1 REQUIRED PARKING

USE <i>See Sec. 5.19.3 for Uses in D1, D2, TC1 Districts</i>	MAXIMUM VEHICLE PARKING SPACES (NONE IF BLANK)	MINIMUM BICYCLE PARKING SPACES				MINIMUM EV PARKING SPACES	
		SPACES	CLASS			CLASS	
			A	B	C	EV-C	EV-I
OFFICE AND RESEARCH (NUMBER OF SPACES / SQUARE FOOT, UNLESS OTHERWISE NOTED)			% OF SPACES PROVIDED				
Office							
Bank, Credit Union, Financial Services	1 / 180	1 / 2,000			100%	15%	5%
Office, General	1 / 250	1 / 3,000	30%		70%	40%	10%
Medical/Dental	1 / 180	1 / 1,500	30%		70%	25%	10%
Nonprofit Corporations	1 / 250	1 / 3,000	30%		70%	25%	10%
Research and Development							
Laboratories, Research, Development		1 / 6,000		100%		40%	10%
TRANSPORTATION (NUMBER OF SPACES / SQUARE FOOT, UNLESS OTHERWISE NOTED)			% OF SPACES PROVIDED				
Transportation							
Transit Center, Station, or Depot		1 / 3,000	30%		70%	90%	10%
Transportation Facilities		None				None	
INDUSTRIAL (NUMBER OF SPACES / SQUARE FOOT, UNLESS OTHERWISE NOTED)			% OF SPACES PROVIDED				
Agricultural							
Agriculture (Greenhouse, Barn, Borrow Pit)		None				None	
Marijuana Microbusiness,	Offices: 1/250; Cultivation: 1/2,000	1 / 3,000	30%		70%		
Marijuana Grower	Offices: 1/250; Cultivation: 1/2,000	1 / 3,000		100%		40%	10%
Manufacturing, Processing, Assembly, and Fabrication							
Asphalt, Concrete Mixing Plant, Sand and Gravel Pit; Coal/Coke Dealer; Oil/Gas Well		1 / 25,000		100%		10%	10%
Heavy Manufacturing; Laundry/Dry Cleaning Plant; Scrap/Waste Material; Slaughterhouse		1 / 25,000		100%		40%	10%

TABLE 5.19-1 REQUIRED PARKING

USE <i>See Sec. 5.19.3 for Uses in D1, D2, TC1 Districts</i>	MAXIMUM VEHICLE PARKING SPACES (NONE IF BLANK)	MINIMUM BICYCLE PARKING SPACES				MINIMUM EV PARKING SPACES	
		SPACES	CLASS			CLASS	
			A	B	C	EV-C	EV-I
Light Manufacturing, Pilot Manufacturing		1 / 25,000		100%		40%	10%
Utilities and Communications							
Broadcasting Facility, Data Processing and Computer Centers		1 / 3,000	30%		70%	40%	10%
Electric, Gas, and Sanitary Services; Power and Fuel Rights-of-Way; Wireless Communication Facilities		None				None	
Warehousing and Storage							
Outdoor Storage		None				None	
Warehousing and Indoor Storage		1 / 30,000		100%			10%
ACCESSORY USES (NUMBER OF SPACES / SQUARE FOOT, UNLESS OTHERWISE NOTED)				% OF SPACES PROVIDED			
Bed and Breakfast, Accessory		1 space		100%			
Community Recreation		1 / 1,000			100%	10%	10%
Dwelling Unit, Accessory		None				100%	
Dwelling Unit, Manager's		None				100%	
Family Day Care Home		None				100%	
Group Day Care Home		None				100%	
Home Occupation		None				None	
Management/Maintenance Office and Storage	1/250	1 / 3,000	30%		70%	25%	10%
Restaurant, Bar, Food Service		1 / 750		50%	50%	25%	10%
Retail Sales, General Merchandise	1/265	1 / 3,000		50%	50%	10%	10%
Roadside Stand		None				None	
TEMPORARY USES							
Christmas Tree Sales	None	None				None	

TABLE 5.19-1 REQUIRED PARKING

USE <i>See Sec. 5.19.3 for Uses in D1, D2, TC1 Districts</i>	MAXIMUM VEHICLE PARKING SPACES (NONE IF BLANK)	MINIMUM BICYCLE PARKING SPACES			MINIMUM EV PARKING SPACES	
		SPACES	CLASS		CLASS	
			A	B	C	EV-C
Outdoor Sales, Temporary by Others	By Special Exception					
Special Event Sales	By resolution of City Council					

5.19.3 Special Parking Districts

Lots located in the D1,D2, or TC1 zoning districts are considered a special parking district and are subject to Table 5.19-2:

TABLE 5.19-2 SPECIAL PARKING DISTRICT REQUIREMENTS							
ZONING DISTRICT	MAXIMUM VEHICLE PARKING SPACES (NONE IF BLANK)	MINIMUM BICYCLE PARKING SPACES			MINIMUM EV PARKING SPACES		
		SPACES	CLASS		FACILITY STANDARDS		
			A	B	C	EV-C	EV-I
NUMBER OF SPACES/SQUARE FOOT			% OF SPACES PROVIDED				
D1, D2 – Residential		1/ 2,500	100%			90%	10%
D1, D2 – Nonresidential		1 / 10,000			100%	90%	10%
TC1	1/333	1 / 5,000	50%	25%	25%	90%	10%

5.19.4 Barrier Free Parking

All Parking Lots shall have Barrier free Parking Spaces as required by and in conformity with state law (MCL 125.1352). When one or more EV-I Parking Space is required by Table 5.19-1, the distribution of EV-I Parking Spaces shall be provided per Table 5.19-3.

TABLE 5.19-3 ACCESSIBLE CHARGING STATIONS		
REQUIRED EV-I SPACES	ELECTRIC VEHICLE CHARGING STATION DISTRIBUTION	
	VAN ACCESSIBLE	STANDARD ACCESSIBLE
1-4	1	0
5-50	1	1
51-75	1	2
76-100	1	3
Over 100	1 plus 1 for each 300 or fraction thereof over 100	3 plus 1 for each 60 or fraction thereof over 100

5.19.5 Use of Off-Street Parking Facilities

A. General

1. Parking Spaces shall not be obstructed by storing objects, Structures or vehicles that are inoperative, unregistered or for sale.
2. Bicycle Parking Spaces required by this section shall be accessible to a public Street or Alley.
3. Vehicle Parking Spaces shall be accessible by a driveway connected to a public or private Street or Alley.
4. Nothing in this section shall preclude a reasonable charge to the occupants of the Building for use of the any Vehicular Parking Spaces and/or Bicycle Parking Spaces.

B. All vehicles

1. Vehicles must be parked on a Driveway, in a Structure, or within an approved Parking Space or Parking Lot.
2. Vehicle Exception: This subsection shall not be applicable on those days when University of Michigan football games or scrimmages are played in Michigan Stadium, or on the day(s) and place(s) designed as a special event by resolution of City Council.

C. Commercial Vehicles, Oversized Vehicles, Trailers, Boats, Campers, and Similar Vehicles

1. Residential Zoning Districts

- a. Commercial Vehicles, Oversized Vehicles, Trailers, Boats, Campers, and Similar Vehicles must be stored in a Parking Structure, on a Driveway or in a location other than the Front Yard

- b. No more than two commercially-licensed vehicles shall be kept in the open on the vehicle owner's private property or within 500 feet of the property on a public street.
- c. No vehicle over 22 feet long or a commercial vehicle licensed for an empty weight of more than 10,000 pounds shall be parked anywhere on a Lot.

2. Nonresidential Zoning Districts

Commercial Vehicles, Oversized Vehicles, Trailers, Boats, Campers, and Similar Vehicles must be stored in a Building or approved Outdoor Storage.

5.19.6 Design of Vehicle Parking Facilities

A. Placement of Vehicle Parking Facilities

- 1. Parking Lots and Parking Spaces shall not be located in the Front Yard, unless an exception is listed in subsection B.
- 2. Parking Structures shall comply with the use specific standards provided in Section 5.16 and the dimensional standards of the zoning district in which it is located.
- 3. No Parking Space shall be located closer than ten feet to any Building used for a Dwelling Unit on the first Floor.

B. Placement Exceptions

- 1. For Sites with more than one Front Lot Line, Parking Spaces may be located in one Front Yard but shall be set back a minimum of 25 feet from the Front Lot Line of that Front Yard.
- 2. Multiple-Family uses having more than 100 feet of Street Frontage, more than 20,000 square feet of land area, and more than 20 Dwelling Units may have vehicular Parking Lots and Parking Spaces located in the Front Yard but not in the Front Setback Area.
- 3. Religious assemblies, Child Care Centers and schools with more than 100 feet of Street Frontage and more than 20,000 square feet of land area may be permitted to have vehicular Parking Lots and spaces located in the Front Yard but not in the Front Setback Area if approved as part of a Special Exception Use review.

C. Dimensional Standards

- 1. Parking Structures, Parking Lots and Parking Spaces shall have adequate maneuvering area and access to permit use of all Parking Spaces without moving other vehicles and prevent backing of vehicles into a public Street.
- 2. Parking Spaces shall be clearly marked and shall conform to the minimum stall and aisle standards in Table 5.19-3 unless an exception is provided.

3. Exceptions: In the special parking districts referenced in Section 5.19.3, the stalls and aisles within a Parking Structure that is solely available to residents or employees of the Building are not subject to dimensional standards of Table 5.19-4 provided the stalls and aisles remain functional and accessible.

TABLE 5.19-4: STALL AND AISLE STANDARDS					
ANGLE OF PARKING (DEGREES)	STALL WIDTH [A] (FT.)	CURB LENGTH PER STALL (FT.)	STALL DEPTH 90° TO WALL [B] (FT.)	AISLE WIDTH [C] (FT.)	WALL TO WALL WIDTH (FT.)
REGULAR CAR SPACES					
0	9	20	9	12	
45	9	12 ft. 7 in.	19 ft. 5 in.	12	51
60	9	10 ft. 4 in.	20 ft. 5 in.	16	57
75	9	9 ft. 3 in.	20	20	60
90	9	9 ft.	18	22	58
SMALL CAR SPACES [D]					
0	8	18 ft.	8	12	
45	8	11 ft. 3 in.	17	12	46
60	8	9 ft. 2 in.	17 ft. 9 in.	14	49 ft. 8 in.
75	8	8 ft. 3 in.	17 ft. 5 in.	17	52
90	8	8	16	20	52
NOTES:					
[A] Stall width shall be increased by 1 foot for those spaces which are adjacent to a Fence, wall or enclosure. Barrier free Parking Spaces must be designated as required by and in conformity with state law.					
[B] Stalls which allow for vehicle overhang (next to curbs) can be reduced in depth by 2 feet.					
[C] In Lots that are designed for both regular and small cars, the regular size aisle width shall be used.					
[D] Up to 30% of Parking Spaces in a Parking Lot may be designated as small car spaces and clearly Signed for "small cars".					

- D. Surface Material:** Driveways and Parking Lots shall be surfaced with asphalt, concrete, porous pavement, pavers or brick in accordance with City Public Services Standard Specifications. However, Driveways and Parking Lots that serve Single-Family or Two-Family Dwellings with Vehicular Use Areas of less than 1,200 square feet and less than five Parking Spaces may be surfaced with gravel or other similar material in accordance with standard engineering practices. Approval of such surfacing shall be conditioned upon adequate coverage and barriers sufficient to confine the material.
- E. Maintenance:** Parking Lots shall be equipped with curbs or other barriers to confine vehicles to the Parking Lot. Driveways, Parking Lots and Structures shall be constructed and maintained in a manner to prevent drainage nuisances and the formation of potholes and must be kept reasonably free of snow and ice.

5.19.7 Design of Bicycle Parking Facilities

A. General

1. Bicycle Parking Facilities shall conform to the dimensional standards in Table 5.19-5. Alternatives may be allowed by the Planning Manager for designs that use available space more efficiently and store the equivalent number of bicycles and accessories in a smaller area.

TABLE 5.19-5: BICYCLE STALL AND AISLE STANDARDS			
CLASS	SPACE LENGTH AND WIDTH	ACCESS	OVERHEAD CLEARANCE
A	Min. 2 ft. x 6 ft.	Min. 3 ft.	n/a
B	Min. 2 ft. x 6 ft.	Min. 3 ft.	Min. 7 ft.
C	Min. 2 ft. x 6 ft.	Min. 3. Ft.	Min. 7 ft.

2. All bicycle parking facilities must be easily accessible, well lighted, and durable, and securely anchored to pavement, floors, or walls.
3. Bicycle parking facilities outside of a Building shall be considered and included in Open Space calculations. Bicycle parking facilities on the first Floor inside of a Building shall not be included in Floor Area Ratio calculations.
4. Buildings and Structures used for bicycle parking shall comply with all regulations for accessory Structures.
5. Asphalt, concrete, porous pavement, pavers or brick shall connect bicycle parking facilities to a Sidewalk or Driveway.

B. Placement

1. Bicycle parking facilities outside of a Building shall be in close proximity to the main Building entrances and in a location that is visible and easily accessible.
2. Bicycle parking facilities inside a Building or Structure that also has vehicle parking facilities shall have a physical barrier to separate the parking facilities.
3. Bicycle parking facilities inside a Building or Structure shall be located near a main entrance, on the Street level or on a level accessible by an elevator large enough to accommodate the bicycle.

C. Class Standards

1. Class A - Enclosed Bicycle Storage

Class A facilities shall store a bicycle and necessary accessories for longer periods, well protected from weather and theft. Class A bicycle parking is most often used by Dwelling Unit residents. Examples of Class A facilities are individual enclosed storage lockers, enclosed bicycle parking shed, a room within

a Building that contains individual storage lockers or individual hoop spaces with additional storage space, or private garages.

2. Class B - Covered Bicycle Racks

Class B facilities shall store a bicycle for intermediate periods with some protections from weather and allowing both wheels and frame of a bicycle be securely locked with a chain, cable, or padlock. Class B bicycle parking is most often for employees. Examples of Class B facilities are hoops or another type of rack underneath an overhang or shelter.

3. Class C - Fixed Bicycle Racks

Class C facilities shall store a bicycle for short periods, allowing both the wheels and frame of a bicycle to be securely locked. Class C bicycle parking is most often for visitors and customers of a residence, business, or office.

5.19.8 Electric Vehicle Parking Spaces

A. General

1. Single-Family Dwellings, Two-Family Dwellings, Multiple-Family Dwellings with Three or Four Units: All Parking Spaces on the Lot shall be EV-C. For any garage or carport on the Lot, at least one Parking Space shall be EV-R, and the remainder of Parking Spaces inside the garage shall be EV-C.
2. EV-I Parking Spaces shall have signage indicating it is to be used exclusively for Electric Vehicles.
3. Free-standing Electric Vehicle Charging Stations shall have bollards, bumper blocks, or raised curbs to protect the system.
4. Electric Vehicle Charging Stations shall be wall-mounted, or located to accommodate the charging of more than one Parking Stall.
5. Electric Vehicle Charging Stations shall not create a trip hazard or violation of the accessible path of travel when the cord is connected to an Electric Vehicle.
6. Where Parking Lots are separated into distinct areas or when Parking Structures have more than one level, the Electric Vehicle parking facilities shall be evenly distributed among the separate areas or levels.

B. Placement of Electric Vehicle Charging Stations

1. Electric Vehicle Charging Station may not reduce the required stall dimensions provided in Table 5.19-4 and must maintain compliance with state barrier free design requirements.
2. Electric Vehicle Charging Stations in any walkways must maintain at least four feet of walkway width for pedestrians.
3. Electric Vehicle Charging Stations may not be located in any required interior landscape islands, right-of-way screening or conflicting land use buffers.

C. Class Standards

1. EV-C – Electric Vehicle Capable

EV-C are Parking Spaces having a capped cable/raceway connecting the Parking Space to an installed electric panel with a dedicated branch circuit(s) to easily install the infrastructure and equipment needed for a future Electric Vehicle Charging Station. The dedicated branch circuit panel space shall be stenciled or marked legibly with the following text: Future Electric Vehicle Charging Circuit. (See Figure EV-C).

2. EV-R – Electric Vehicle Ready

EV-R are Parking Spaces that are ready for installation of an Electric Vehicle Charging Station except for the EVCS itself. EV-R Parking Spaces shall have a junction box, terminated in an approved method, for a direct buried cable or raceway to an electrical panel with a dedicated branch circuit(s) to power a Charging Station. The junction box shall be clearly marked and labeled with the following text: EV Ready Circuit. (See Figure EV-R)

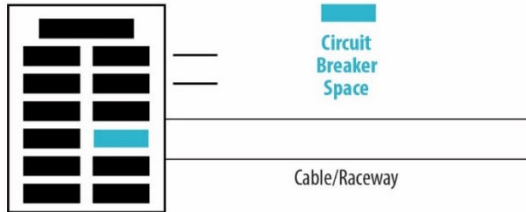
3. EV-I – Electric Vehicle Installed

EV-I are Parking Spaces with an operational Electric Vehicle Charging Station. (See Figure EV-I)

EVCS CAPABLE (EV-C)

Install electrical panel capacity and dedicated cable/raceway (s) that is capped for future EV parking space(s).

Electric Service Panel



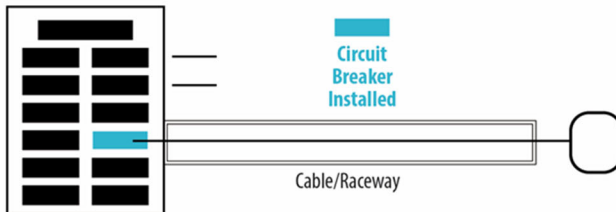
ELECTRIC VEHICLE



EVCS READY (EV-R)

Install electrical panel capacity with a dedicated branch circuit(s) including conductors in a cable/raceway that is terminated in an approved method for future EV parking space(s).

Electric Service Panel



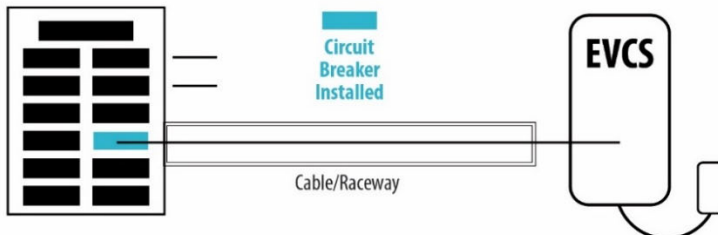
ELECTRIC VEHICLE



EVCS INSTALLED (EV-I)

Install Electrical panel capacity with a dedicated branch circuit(s) including conductors in a cable/raceway and an EVCS charging station capable of providing charge energy to an EV(s).

Electric Service Panel



ELECTRIC VEHICLE



D. Renewable Electrical Supply Recommended

Typical Electric Vehicles as described and defined here are three times more efficient than the most efficient petroleum-based combustion vehicles. They produce no tailpipe emissions and they have more than 50% lower greenhouse gas emissions assuming 2019 DTE upstream emissions associated with the production of electricity. In order for Electric Vehicles to provide the maximum environmental and, in most cases, financial benefits, to their owners and in support of the City of Ann Arbor's carbon neutrality goals, it is recommended that Electric Vehicle Charging Stations be powered by a renewable energy source. Options can be on-site solar power generation or subscribing with a utility or a third party for renewable energy.

5.19.9 Driveways

A. General

1. All Driveways shall lead to a garage, carport, Parking Space, Parking Lot, or Parking Structure meeting the requirements of this chapter.
2. The number of Driveways permitted shall correspond to the number of Openings provided in Section 5.21.
3. Driveways may not cross or be located on any Lot in another zoning district.
4. Driveway shall meet the dimensional standards provided in Table 5.19-6.

TABLE 5.19-6: DRIVEWAY DIMENSION STANDARDS			
ZONING DISTRICT	MIN. WIDTH	MAX. WIDTH	INCREASE ALLOWANCE
R1, R2	10 ft.	24 ft.	May be widened beyond the Front Lot Line up to 30% of Lot Width when leading to garage or carport
All Others – One Way	10 ft.	15 ft.	None
All Others – Two Way	18 ft.	24 ft.	None

Section 9. That this Ordinance shall take effect 10 days after publication.

CERTIFICATION

I hereby certify that the foregoing ordinance was adopted by the Council of the City of Ann Arbor, Michigan, at its regular session of August 15, 2022.

(Date)

Jacqueline Beaudry, Ann Arbor City Clerk

Christopher Taylor, Mayor of the City of Ann Arbor

I hereby certify that the foregoing ordinance received legal publication in the Washtenaw Legal News on August 25, 2022.

Jacqueline Beaudry, Ann Arbor City Clerk



City of Albuquerque

Sustainability Office

Timothy M. Keller, Mayor

November 28, 2021

Mr. Timothy J. MacEachen
Chair, Environmental Planning Commission
City of Albuquerque

Dear Mr. MacEachen:

On behalf of the City of Albuquerque's Sustainability Office, this serves as a letter of support for the City of Albuquerque Planning Department's recommendations to update electric vehicle (EV) charging infrastructure definitions and increase EV off-street parking requirements for certain new developments in the Integrated Development Ordinance (IDO). These recommendations include:

- Defining EV-capable and EV-installed charging infrastructure
- Requiring minimum levels of EV-capable and EV-installed parking spaces for certain developments
 - Non-residential with 50,000 ft² or more gross floor area
 - Multi-family residential with 100 or more units
 - Off-street parking with 200 or more spaces
 - Townhomes with six or more units

EV ownership in Albuquerque and the United States has been rapidly increasing over the past several years and is projected to continue accelerating in the future, due to commitments from vehicle manufacturers and governments worldwide. For example, Ford Motor Company has committed 50% of its sales to be EVs by 2030, while General Motors has committed to 100% EV sales by 2035. Likewise, Washington State recently targeted 100% light-duty EV vehicle sales by 2030, while California is requiring all new light-duty vehicles to be zero-emissions by 2035. In addition, the Biden administration has targeted half of all new vehicles sold in the U.S. in 2030 to be zero-emissions and has directed substantial federal investments in EVs and charging infrastructure in the Bipartisan Infrastructure Law and Inflation Reduction Act.

The City of Albuquerque has committed to climate action in its Resolution R-19-187 declaration of a climate emergency, Mayor Keller's pledge to meet the Paris Climate Agreement Goals to reduce greenhouse gas (GHG) emissions, and in the City's 2021 Climate Action Plan (CAP). According to the 2020 City of Albuquerque GHG Inventory, on-road transportation accounts for approximately 33% of overall GHG emissions. One strategy to achieve vehicle emissions reductions in the CAP is to increase the availability of and equitable access to EV charging.

Barriers to achieving greater adoption of EVs include the lack of EV charging locations and cost of installing new EV chargers. To date, the Keller administration has demonstrated its commitment to EV charging expansion by installing 20 EV charging stations at City facilities with 36 ports. Additionally, the City provides an EV-Ready dealership certification program and has implemented a Zero Emissions Vehicle (ZEV) First policy for City vehicle procurement.

The purpose of these EV charging station recommendations are to encourage EV adoption, while reducing the GHG emissions and air pollution from gasoline and diesel vehicles. Requiring greater levels of EV charging infrastructure in new developments, especially multi-family housing, will increase the availability and accessibility of EV charging throughout the City and incentivize more people to purchase EVs. In addition, the cost of installing EV charging infrastructure into the construction of a new development is minimal compared to retrofitting new EV infrastructure into an existing development.

These EV charging station recommendations are an initial effort to update the IDO to prepare for a rapidly changing, electrified transportation system. More comprehensive IDO updates will need to be addressed in the future. Many cities of all sizes across the U.S. have already adopted wide-ranging EV-friendly ordinances requiring minimum levels of EV parking spaces. One such example is the City of Ann Arbor, Michigan, which adopted minimum EV parking requirements for a variety of residential, commercial, industrial, and institutional zoning districts. Please refer to the attached document for more information on Ann Arbor's EV parking standards. Thank you for considering this important matter.

Sincerely,

Kelsey Rader, J.D.
Sustainability Officer
Sustainability Office
City of Albuquerque
505-250-3433 krader@cabq.gov

CC: Albert Lee, Sustainable Transportation Specialist

Attachment: Ann Arbor ORD-22-13 Parking Standards Chapter 55

12/1/2022

Environmental Planning Commission
City of Albuquerque

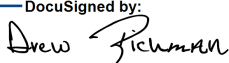
Re: Upcoming IDO Changes

To whom it may concern:

As a business owner and real estate investor, I believe allowing higher density developments in the City of Albuquerque is a positive thing for our City and State.

I support the IDO changes to allow two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing the kitchen requirements.

Please consider supporting these changes.

DocuSigned by:

359F5C50420B4C5...

Sincerely,

D. Drew Richman
Home Owner

Certificate Of Completion

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Status: Completed

Subject: Complete with DocuSign: EPC Letter.pdf

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Document Pages: 1

Signatures: 1

Envelope Originator:

Certificate Pages: 1

Initials: 0

Drew Richman

AutoNav: Enabled

260 W 10th Ave

Enveloped Stamping: Enabled

Kettle Falls, WA 99141

Time Zone: (UTC-08:00) Pacific Time (US & Canada)

drew@loanfox.com

IP Address: 76.127.54.115

Record Tracking

Status: Original

Holder: Drew Richman

Location: DocuSign

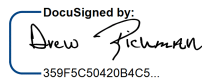
12/1/2022 10:39:36 AM

drew@loanfox.com

Signer Events**Signature****Timestamp**

Drew Richman

DocuSigned by:



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Sent: 12/1/2022 10:40:24 AM

drew@loanfox.com

Viewed: 12/1/2022 10:40:33 AM

Branch Manager

Signed: 12/1/2022 10:40:38 AM

Loan Fox Inc

Signature Adoption: Pre-selected Style

Security Level: Email, Account Authentication (None)

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Electronic Record and Signature Disclosure:

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In Person Signer Events**Signature****Timestamp****Editor Delivery Events****Status****Timestamp****Agent Delivery Events****Status****Timestamp****Intermediary Delivery Events****Status****Timestamp****Certified Delivery Events****Status****Timestamp****Carbon Copy Events****Status****Timestamp****Witness Events****Signature****Timestamp****Notary Events****Signature****Timestamp****Envelope Summary Events****Status****Timestamps**

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12/1/2022 10:40:38 AM

Payment Events**Status****Timestamps**

From: [Anita Ricka](#)
To: [Lehner, Catalina L.](#)
Subject: R-1 changes
Date: Tuesday, November 22, 2022 2:46:17 PM

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

Hello!

I do support this change. In this day and age when families are challenged I find it a wonderful possibility to

have a grandparent or a son living on the same property, but with the privacy of a small dwelling.

I hope that this can also be applied to an existing dwelling, so if a family wants to turn the garage or a workshop into a dwelling for a family member - that this can be allowed.

Thank you

Anita Ricka

From: [Vinay Rodgers](#)
To: [City of Albuquerque Planning Department](#)
Subject: O-22-54
Date: Sunday, November 27, 2022 7:52:30 AM

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

Hello to the EPC's,

I would like to express my thoughts and support of all of the IDO changes to O-22-54

Firstly I absolutely support the advancement of more affordable housing to all. In light of the aftermath of covid, job & employment loss & recovery that may take years to recoup. Myself being a victim to this after about 30+ years in my field of work as a chef.

My view is that we certainly should be allowed multifamily dwelling as this will only help and support the economic sustainability for households. A practice of sharing a residence with another party/family to assist in just sustaining life in general. It does not help that inflation seems rather high with prices through the roof for basic necessities. It helps to share usable space to help a family in need as much as those who have been facing hardships just staying alive. The practice of multi-family dwelling under one roof is not a new concept and is now becoming commonplace in mainstream society across many states in the country, and has been so normal in so many countries around the world. This narrative leads me to fully support the proposed changes with regards to - single family to be split, ADU's allowance citywide, allowance of additional cooking facilities/kitchens, and the easing of parking restrictions around homes that are being used for the service of a bigger purpose of allowing for economic relief for those that opening their homes to help others and themselves in this economic and affordable housing crises. I wholeheartedly support these changes. and encourage the governing bodies to incentivize those that are willing to open up and share their homes to accomodate a family in need.

Thank you.

Regards,



Vinay Rodgers

C : 505 417 2733

O: 505 803 3800

W: www.therodgersneighborhood.com

Simply Real Estate-NM.

Your Friendly Neighborhood Realtors.



From: [Armando Romero](#)
To: [Davis, Pat](#); [Foran, Sean M.](#); [City of Albuquerque Planning Department](#)
Cc: [Michael Basile](#)
Subject: Opposition to O-22-54
Date: Wednesday, November 23, 2022 9:43:47 AM

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

Good Morning -

We are property owners and residents of the Spruce Park neighborhood and we oppose the proposed amendments to the IDO included in O-22-54.

After reviewing the proposed amendments, we feel it will disproportionately have a negative impact on the historical neighborhoods near the Central corridor from Old Town through Nob Hill, and several neighborhoods near UNM. The close proximity of these neighborhoods to the central part of the city would encourage the destruction of these older neighborhoods and homes. These neighborhoods would become target areas for investors and some property owners to replace single family homes on lots that are zoned R-1(A,B,C) with duplexes, and other multi-family homes.

I support the overall objective of meeting the housing needs of lower income families and solving the housing crisis. However, I think it can be accomplished through the existing IDO zoning classifications of R-T, R-MH, and R-ML. Additionally, following the process for zoning waiver/variance requests should also enable property owners a path to meet the needs of multi-generational families.

Thank you in advance for advocating for the property owners in these neighborhoods.

Please feel free to reach out with any questions.

Thanks,
Armando Romero and Michael Basile
1315 Sigma Chi Rd NE,
Albuquerque, NM 87106
505-715-3114

From: [Kyle D. F. Roth](#)
To: [City of Albuquerque Planning Department](#)
Subject: Proposed city-wide zoning changes in O-22-54
Date: Monday, November 21, 2022 2:26:31 PM

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

Dear Timothy,

I am a resident of a near-UNM neighborhood, Spruce Park, and a lifelong citizen of Albuquerque. I do not support the proposed city-wide zoning changes in O-22-54 for reasons as follows:

- While I recognize that we have a city-wide housing shortage, particularly in the rental market, I question that enough consideration has been given to the shift in character, quality, and value that this would place on single family residential neighborhoods city-wide. Not just in the UNM area, but in any other high-demand area. Citizens that purchased their single-family homes had some stability knowing that their investment would remain, and be reasonably maintained, within a single-family neighborhood – single family rentals included. This sweeps that stability of value out from under them – possibly exposing the City to liability as well.
- We think the proposal will have these unfortunate consequences for Spruce Park and other University-area neighborhoods in particular. Given escalating rents, the city's incentives for investors to convert single family homes in the neighborhood to rentals will be powerful and irreversible. Current single family rental levels are certainly acceptable and should be allowed, however to allow these densities to triple should not.
- The process is rushed and appears to be on track for approval and implementation before most people know what is happening, and that is unfair to the citizens of this city that have invested their residences and family homes here.

I myself am a retired City of Albuquerque Planning staff member, and I appreciate your efforts, and value your time in serving all of us.

Best regards,

Kyle Roth
612 Ridge Place NE
Albuquerque, NM 87106
Cell:505-908-0659

From: [Joshua Rutkowski](#)
To: [City of Albuquerque Planning Department](#)
Subject: Transformative zoning changes - public comment
Date: Sunday, November 27, 2022 6:53:14 PM

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

Hi,

As a homeowner in Nob Hill and a citizen of Albuquerque, I'm writing to support Mayor Keller's initiative to update the zoning to permit higher density housing.

As a bicycle commuter, I know that increasing housing density increases safety for our city.

Best,

Joshua Rutkowski

429 Dartmouth Dr NE, Albuquerque, NM 87106

From: [Joe Sabatini](#)
To: [City of Albuquerque Planning Department](#)
Subject: Accessory Dwelling Units
Date: Sunday, November 27, 2022 10:06:13 PM

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

Dear EPC Commissioners:

I have lived in the Near North Valley since 1968. As an active member of the Near North Valley Neighborhood Association, I have participated in several of the City's efforts to revitalize the Fourth Street Corridor and develop the 12th & Menaul/Old Indian School/Indian Pueblo Cultural Center area. There are many properties in our area which already have long-standing accessory dwelling units. I believe that there are many parts of the City in which these units would have a positive impact on the stock of available affordable housing that we need so urgently. I appreciate your efforts to identify the parameters of function and size that will best meet this need.

I urge you to support enlarging the possibilities for creating more accessory dwelling units.

Joe Sabatini
3514 6th Street NW
Albuquerque, NM 87107

"Tell me not, in mournful numbers...." H.W. Longfellow

From: [D Scott](#)
To: [City of Albuquerque Planning Department](#)
Subject: support for ADUs
Date: Monday, November 28, 2022 9:04:58 AM

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

I support them! And I support regulations that allow more of them to be built in ABQ.
- D. Scott, 1005 Girard Blvd NE, 87106
my pronouns are they/them

From: [Wayne Sears](#)
To: [City of Albuquerque Planning Department](#)
Subject: IDO changes
Date: Monday, November 28, 2022 10:32:57 AM

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

Environmental Planning Commission
City of Albuquerque

Re: Upcoming IDO Changes

To whom it may concern:

As a business owner and real estate investor, I believe allowing higher density developments in the City of Albuquerque is a positive thing for our City and State.

I support the IDO changes to allow two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing the kitchen requirements.

Please consider supporting these changes. Let's work together to increase housing supply and reduce housing costs.

Sincerely,

Wayne R. Sears

Sent from my iPhone

From: [Shoshanna N. Silverberg](#)
To: [City of Albuquerque Planning Department](#)
Subject: Public Comment re IDO changes
Date: Monday, November 28, 2022 9:16:03 AM

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

To Whom It May Concern:

As a business owner and community member, I strongly believe allowing higher density developments in the City of Albuquerque is a positive thing for our city and state.

I support the IDO changes to allow two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multifamily properties, and making hotel conversions easier by removing kitchen requirements.

Please consider supporting these changes and thank you for your time.

Shoshanna Silverberg
Nob Hill Resident
Local Attorney

--

Shoshanna N. Silverberg
Juris Doctor
Master of Arts in Holistic Thinking
(c) 860.214.8249

"Perhaps the greatest challenge to thinking women is the challenge to move from the desire for safety and approval to the most 'unfeminine' quality of all -- that of intellectual arrogance, the supreme hubris which asserts to itself the right to reorder the world." (Gerda Lerner)

From: [Janet Simon](#)
To: [City of Albuquerque Planning Department](#)
Subject: Re: Comments for the EPC regarding IDO Annual Update 2022
Date: Sunday, November 27, 2022 1:52:45 PM
Attachments: [PHNA IDO CHANGES COMMENTS 11 27 22..pdf](#)

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

Submitting written comments (Letter attached) on behalf of Parkland Hills NA.

Thank you.

Janet Simon

President, PHNA

From: Parkland Hills Neighborhood Association (PHNA)

To: Attention Chair MacEachen

Email abcto@cabq.gov

Re: Comments for the EPC regarding IDO Annual Update 2022 including both:

EPC Submittal - Citywide Proposed Changes “Printed 10/27/2022” and

O-22-54 City Council Bill proposed changes to the IDO.

Submitted prior to 11/28, 9 am: Deadline for written comments to be included in EPC staff report

A. Comments regarding IDO Annual Update 2022 - EPC Submittal - Citywide Proposed Changes “Printed 10/27/2022”

IDO printed change proposal comments:

Some of the initial proposed changes that were published as of late October, that could affect us include. There are more but I have focused on ones that I think are the most important. Included are my thoughts on some of these:

1. **Item 11 and 47 - 5-2(C) and 7-1:** Sensitive Lands / Mature Trees – If you have an established tree with a trunk over 8” diameter that you want to remove, you could have to get approval from the City Forester.
If you get that approval, you could possibly be required to replace it with a tree with the same size trunk, which could be expensive.

Oppose: It could be expensive, time consuming, and takes away property rights unilaterally placing burden on entire city excluding city entities

2. **Item 20 to 25 - 5-6(E)(2)(a), 5-6(E)(3)(a), 5-6(E)(4)(b), 5-6(E)(5), Table 5-6-5, 5-6(E)(5) / Table 5-6-5.** Currently there are different sizes of Landscape buffers between different uses such as residential and businesses. This appears to remove these different minimums.

Oppose: The proposed change would remove minimum required distances, which could negatively affect adjacent properties. Currently available option is to get variance which permits community input which gives opportunities for change when it fits into the community.

3. **Item 26 and 27 - 5-7(D)(3)(a) Table 5-7-2.** Next is a proposed change to walls and fences in our front yards. Currently, you can only have a three-foot high front yard wall without going for variance at a public hearing.

This change would allow an open fence above the three foot wall up to five feet without any public hearing or neighborhood input.

Oppose: This might fit into the character of old town, but might not fit into the character of neighborhoods in other parts of the city.

4. **Item 35 – 6-4(V)(3)(d)** Appeals - Remand Hearings Revise Subsection 6 to add text as follows:

"The LUHO shall notify the parties and Planning Department staff of the remand."

Add a new Subsection 7 with text as follows:

"Planning Department staff shall notify the parties of the date and time of the remand hearing. Public notice pursuant to Table 6-1-1 for the original decision is not required. The decision by the original decision-making body at the remand hearing is considered final unless one of the parties appeals the decision to the LUHO."

Oppose as written: If this change goes into effect, two separate damages results occur, with LUHO remand procedures and authority changes, and potential increased appeal time and costs.

Current text reads as follows:

"6. If the LUHO determines that the matter should be remanded, the LUHO shall set forth the reason(s) for the remand and the matters to be reconsidered and may order such remand without approval by the City Council."

6-4(V)(3)(d) - Appeals - Remand Hearings

Comments on proposed first part of the change is as follows:

If this change goes into effect, two separate results occur, which affects LUHO remand procedures and changes LUHO delegated authority changes.

1. The proposal to Revise Subsection 6 to add text as follows: "The LUHO shall notify the parties and Planning Department staff of the remand." should add the party who the decision is being remanded, such as the ZHE, and shall be given clear instructions on the extent of the remand, whether narrow or complete remand, and instructions on distribution of the Remand decisions, including notification to the LUHO, or to the city council, if so directed by the LUHO in their appeal recommendations to the city council, if there is no additional appeal. This would provide for LUHO directed narrow remands to complete the legal appeal process as identified in the IDO. Currently there does not appear to be direction for narrow remands, when they are to be forwarded to the City Council, which recently has left an appeal process incomplete.

2. The proposal to add a new Subsection 7 has 2 elements that need to be addressed separately.

- a. The addition of the text; "Planning Department staff shall notify the parties of the date and time of the remand hearing." clarifies legal procedures that currently are not clearly identified in the IDO. Please recommend that this change be included in changes to the IDO. This corrects errors that have occurred which denied parties right to be notified of hearings in the past year.
- b. The addition of the text "The decision by the original decision making body at the remand hearing is considered final unless one of the parties appeals the decision to the LUHO." takes away the currently used delegated authority of the LUHO to remand single issues.

Currently the LUHO can remand a single issue, but under the change, LUHO remands create a new decision, taking away the delegated authority of the LUHO

to remand single issues, which are included with the original appeal then is forwarded to the city council with the LUHO's recommendations . With this language, any remand appears to require a full hearing, repeating the beginning of the application hearing process with the ZHE. Any remand will also require additional paid appeals as the newly remanded decision negates the LUHO original appeal's recommendations to the City Council. .

Oppose as Written: Though it needs changes, the proposed changes could make appeals more complicated, time consuming, and more expensive which is a challenge to applicants, neighborhoods, as these are often done by volunteers, and not lawyers, Members of PHNA Board have experienced the payment of extra money due to the city's confusion and error with the current regulations.

5. **Item 40 and 41 - 6-6(B)(1), 6-6(B)(2):** If your home is over 50 years old or you could not prove it's not, and you want to demolish a house, or part of it, such as removing a porch for an addition, you would have to get permission from the historic planner who will decide whether or not you can do this. This could take up to 210 days (seven months).

Oppose: Takes away property rights and makes overloaded and slow city departments worse and unilaterally places burden on city, particularly large sections of southeast and northeast heights.

6. **Item 42 - 6-7(H)(1)(b)** Next is a change to the Appeals process for a Zoning map change.

Oppose: If someone wants to appeal a change to the zoning of a lot or an area, such as R1, there would only be 15 days to do this. It's very complex to protest and really would negate non lawyers from being able to protest this, therefore taking away neighborhood rights. We request that the time be extended significantly to reasonably accommodate appeals.

The following proposed amendments regarding electric vehicle IDO amendment proposals are addressed through one set of comments as they are intertwined:

7. **Item 14 - 5-5(C)(6)(a)** Electric vehicle charging station space shall replace 2 required parking spaces.
8. **Item 16 - 5-5(C)(9)** When more than 200 off street parking spaces constructed, 5 percent shall include 240 volt electric vehicle charging stations.
9. **Item 17 - 5-5(C)(9)** All new townhouses with more than 6 dwellings shall have all parking with EV capable charging.
10. **Item 18 - 5-5(C)(9)** All multifamily with more than 100 dwelling units shall have 5 percent with installed 240 volt chargers and 25 percent shall be EV capable.

Oppose reduced parking/ Support requirements for EV installed and EV capable spaces: While other proposed changes of reducing parking is to decrease the cost of new housing, this requirement increases costs of construction of new housing units while taking away possibly needed parking spaces. Before this is forwarded on, there should be research and studies on what percentage of parking at apartments are utilized so as not unreasonably burden residents while profiting developers. The inclusion of required EV charging is a good concept, for a large development of over 200 units, the cost of development should be borne by the developer, who is gaining

a reduced cost of construction per unit over smaller developments, such as 10, 20, and 50 unit developments due to the decrease in infrastructure costs.

Additional impressions

This combined with other sections which eliminate some or all parking could be confusing. Many apartments currently appear to be at maximum capacity, and this would burden residents in areas of higher density housing in addition to creating greater expense for residents where parking is charged for, which could be exacerbated with fewer spaces. Frequently the working poor have to have vehicles to get to jobs and should not be challenged with finding extremely limited parking.

- i) While we are eliminating or drastically reducing parking in many instances to make affordable construction of housing more available, this could greatly increase the cost of multifamily, having a contradictory effect. The cost of providing 50 amp circuits to so many parking spaces, is like adding electricity required equal to an additional apartment for each parking space, greatly increasing the cost of electrical service and greater demand on our electrical grid.
- ii) Though we need to provide new construction with the ability to provide for car charging, providing power to it during construction, versus having the wiring in place to be connected in the future could provide a reasonable cost effective alternative both more easily providing for future EV power while not dramatically increasing initial construction costs, therefore making new apartment construction more feasible.

B. O-22-54 City Council Bill proposed changes to the 2022 IDO.

^{B.}

11. SECTION 1. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO ALLOW TWO-FAMILY DWELLINGS PERMISSIVELY IN THE R-1 ZONE DISTRICT CITYWIDE.

And

SECTION 2. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO ALLOW DETACHED ACCESSORY DWELLING UNITS WITH KITCHENS PERMISSIVELY IN THE R-1 ZONE DISTRICT CITYWIDE, EXCEPT IN SMALL AREAS WHERE SPECIAL REGULATIONS APPLY.

These permit detached casitas up to 750 square feet and duplexes on lots in the zone **Support with the following added conditions:** This could possibly significantly help to alleviate some of the current housing shortage and is a great concept. The following conditions should be added so as not to cause a detriment to neighborhoods due to haphazard construction of these units:

- 1) Require adequate off street parking for dwelling unit and additionally for additional or accessory dwelling unit per current city regulations. This ensures that there is adequate off street parking so as not to overrun the streets with cars in areas with limited on street parking availability**
- 2) Require that the additional unit architecturally tie in with the existing residence.**
- 3) Require that if any garage is removed, with this change, it shall either be replaced with a garage of the same size or the converted garage shall be returned to its original build.**
- 4) There shall be no exception for existing covenants. Covenants excluding this would be null and void, If there is an exemption, this would burden and discriminate against lower income neighborhoods and give special preference to wealthier neighborhoods.**

Additional Comments:

- i) This could be a great opportunity to more readily increase much needed housing with most single family lots.
- ii) If the quality does not repeat some of the poorly executed single garage conversions around UNM, this could be a positive contribution to the neighborhood and community.

12. SECTION 4. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO ELIMINATE BUILDING HEIGHT MAXIMUMS FOR MULTI-FAMILY RESIDENTIAL DEVELOPMENT AND MIXED-USE DEVELOPMENT.

The bill also would eliminate height limits for mixed-use development and for multi-family housing in the highest-density residential zone.

Oppose without added study: This would give developers a monetary benefit without significantly helping communities unless studies and research of existing regulations of cities like New York who have permitted height increases in buildings with tradeoffs to benefit the local communities.

Additional impressions

- (a) Typically, cities create zoning ordinances to control quality of development. An example is large cities where they permit taller buildings where require exchange for

taller buildings, tradeoff requirements are included to help the surrounding areas to create a better quality of life for all.

- (b) How would placing an unlimited mixed use or MX zoned development effect the surrounding neighborhoods. For example, the property on San Mateo, behind the 7-11 is MX and could theoretically have a 10 story apartment building with no parking if at least 20% of the residential units will be affordable housing based on the following proposed change. It would be entirely on street parking for all units. What would that do to the surrounding neighborhood.
- (c) This demonstrates the importance of being aware of zoning ordinance changes. This is the reason that it should be very in-depth, and analyzed by much more experienced zoning developers and researchers, who specialize in this analysis prior to advancing with these proposals.

13. SECTION 5. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO EXEMPT AFFORDABLE HOUSING FROM OFF-STREET PARKING REQUIREMENTS.

And

SECTION 6. ADD A PARKING REDUCTION FOR MULTI-FAMILY DWELLINGS IN MIXED-USE ZONE DISTRICTS.

It exempts projects where at least 20% of the residential units will be affordable housing from providing off-street parking and reduces current requirements for other multi-family and mixed-use developments by 75%.

Oppose with minor exception: Oppose general reduced parking to entire project./ While proposed changes is to decrease the cost of new housing, this requirement could overburden neighborhood and residents by requiring on street parking. Before this is forwarded on, there should be research and studies on what percentage of parking at apartments are utilized so as not unreasonably burden residents while profiting developers. for a large development, the cost of development should be borne by the developer, who is gaining a reduced cost of construction per unit over smaller developments, such as 10, 20, and 50 unit developments due to the decrease in infrastructure costs. This also could be impacted by other proposed changes that reduce parking by 50 percent for each EV parking space, which would even further reduce parking without adequate studies.

An alternative could be to require all developments of 15 or more to include 10% of affordable units as part of the project in order to obtain a permit, similar to what other large cities require.

Additional impressions

- i) The concept of reducing parking where less cars would be present due to lower income is one questions to ask. It seems logical that it could be valid to some extent. But eliminating the requirement for any parking is giving developers great advantage over ones that provide needed parking and would encourage developers to reduce parking even when it is contrary to the needs of the community and contrary to good planning practice. Unless we want to overload streets with cars, this could create greater challenges for lower income, who are often minorities.
- ii) Reducing current parking requirement by 75% would help developers, but how often do you see apartments with 75 percent of the spaces empty. This may be intended to provide more economical opportunities for more housing for lower income families, but it just helps developers squeeze everyone so that they can make more

money. Unless you charge for parking, therefore harming the lower income population the most, it will be a free for all like parking at CNM without a parking pass. You could drive for 30 minutes to find a parking space.

- iii) The intent is to increase construction of apartments which are badly needed. If this is implemented, the value of the land would go up as more apartments could be built there, possibly negating the potential opportunity for more available and less costly rental units.

Respectfully submitted,

Janet Simon

President, Parkland Hills Neighborhood Association (PHNA)

725 Van Buren PL SE, ABQ, NM 87108 Phone: 505-239-0229

From: [Jo Stein](#)
To: [Renz-Whitmore, Mikaela J.](#); [City of Albuquerque Planning Department](#)
Subject: Comment on IDO Changes
Date: Tuesday, November 29, 2022 12:52:15 PM

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

Folks,

Thanks for the chat today. Below is my comment.

I am firmly in support of removing the restrictions on accessory dwelling units and duplexes in R1 portions of the city. This simple change would give families not only a way to increase affordable housing, which our city desperately needs but it also gives them the ability to generate income from their homes to support familial wealth building.

For example I presently live on Adams Street NE and the house directly behind me has a grandfathered ADU. They are a young couple and they have another young couple who live in their ADU and help them cover their mortgage. Another neighbor across the street has a converted garage that their 20 something son lives in while still having some independence.

I would love to be able to build an ADU in the oversized backyard of my house here so that another small affordable unit gets added to my highly walkable neighborhood. When I first moved back to NM after college I lived in a converted garage in Santa Fe as a renter. As a single woman I wanted to be in a safe residential neighborhood. Adding more of this sort of housing stock increases safety and neighborhood engagement; it does not increase crime.

I am a small landlord and I own two grandfathered small multi-family buildings that would never be possible today. My tenants on the whole are wonderful people, some have lived in their homes for more than a decade. We need to return to a place where we can build more of this sort of housing stock.

It is also important to note that many folks have systemic barriers that will make them lifelong renters. As a result, increasing the number of rental ADUs and duplexes will give them access to thrive in more parts of our city. We shouldn't let racism or misguided ideas not backed by evidence get in the way.

Additionally, making simple straight forward changes that makes ADUs and duplexes permissive in all areas reduces costs and barriers to the creation of affordable housing. The current very limited permission based on arbitrary distance from a transportation corridor is extremely confusing and small folks like myself just give up and invest elsewhere instead of putting our \$\$ toward the economic development of our state.

I am not some fancy lobbyist or big time developer. I am a concerned citizen that wants to make our city better and one of the ways I hope to do that is by rehabbing buildings and ensuring more folks have access to safe and desirable homes. I'd also love to build some ADUs too.

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Jo Stein

gutenbergcap.com

From: [Jennie](#)
To: [City of Albuquerque Planning Department](#)
Subject: IDO changes to EPC
Date: Sunday, November 27, 2022 5:44:14 PM

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

I support changes to the IDO to allow casitas on large residential lots zoned R-1.

I live in the Nob Hill area and would love to be able to build a small casita for my daughter to live in since she can't afford to rent and will never be able to buy a house. Personally, I like the idea of having living spaces for extended family on one large lot.

Best Regards,
Jennie Stonesifer
719-539-3023

Sent from my iPhone=

From: [Lucho Sutherlin](#)
To: [City of Albuquerque Planning Department](#)
Cc: board@bikeabq.org
Subject: Proposed IDO Changes
Date: Sunday, November 27, 2022 8:26:49 PM

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

To whom it may concern,

I'm writing this letter to both support and also express some concerns regarding the proposed IDO Changes outlined by Housing Forward Albuquerque. I would love to see a denser Albuquerque metro area and what was outlined would certainly accomplish this, but as I see it, this would require large investments in a true multimodal transportation system and an emphasis on mixed use structures to work well for our city.

If we are going to reduce or eliminate the need for off street parking, we need to make walking, biking, and public transit a safe and appealing alternative to single occupancy vehicles. Our city has implemented the complete streets ordinance intended to address this, but the progress of those efforts would need to accelerate drastically to keep up with a denser urban environment. As a cyclist, I frequently find cars parked in bike lanes and I worry that not taking the above concern into consideration would turn our city's bike lanes into parking lots. Bottom line, reduce the amount of single occupancy vehicles used in our city if off street parking will no longer be required for developments.

Mixed use structures are ideal for a dense urban environment and should be emphasized in this proposal. Having a multi story building with commercial on the first floor and residential on additional stories helps reduce or eliminate the need to jump in a car when running errands or commuting to work. Living above a grocery store, restaurant, post office, etc.. would create a pleasant walkable community. My concern with the proposed changes is that adding density to a neighborhood zoned for single family homes doesn't address the car centric nature of these communities. If there is a plan that would provide these areas with essentials like grocery stores that are easily accessible by walking or biking that's great, but it seems that what's proposed would create more spillage of private property (parked cars) onto our public roads.

In summary, let's implement changes that generate affordable housing, increase urban density, and make our city safe for vulnerable road users by emphasizing mixed use structures and investing heavily in multimodal transportation.

Thanks,

Luis Sutherlin

From: [Maya Sutton](#)
To: [Renz-Whitmore, Mikaela J.](#)
Subject: Strong objection to IDO changes from Inez Neighborhood Assn
Date: Tuesday, November 22, 2022 8:36:07 PM

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

Greetings, Manager Renz-Whitmore:

Below is our report of vehement objections by the Inez Neighborhood Association to the proposed changes in the IDO to allow secondary dwellings on the property of one-family homes in R-1 neighborhoods. We appreciate your open communications with us! However, the source you said to contact to include our comments in the staff report cannot be reached: abcto@cabq.gov -- so I am writing to you -- would you please insert my statement below into the "staff report?" As you will see, I have already sent the same report to all City Councilors and soon to the EPC.

Many thanks for your excellent service with us.

Sincerely,

Maya Sutton, Ph.D., President of the Inez Neighborhood Assn.

~~~~~

Greetings, City Councilors:

As President of the Inez Neighborhood Association, I am writing on behalf of the residents in the 450 homes in our neighborhood in the mid-Heights. We **vehemently oppose** allowing secondary dwellings in R-1 zoned neighborhoods. Many of our residents bought their homes 20 to 40 years ago, specifically because R-1 zoning only allows one dwelling per lot and the Inez area was totally infilled. We were buying into stable, safe neighborhoods. To change the IDO to allow secondary dwellings breaks the City's contract with tens of thousands of homeowners in R-1 areas.

It is far better to **instantly** create new housing by converting empty commercial buildings that have existing plumbing, electricity, and parking. Also, a better idea is for the City to purchase used trailers and rent them to low-to-middle income people.

Creating new dwellings would require each property owner to go through the long process of getting permits and blueprints, hiring contractors, getting inspections, complying with setbacks, connecting utilities, etc. This crowding would increase demand for water, sewage, electricity, and gas in areas with old infrastructure. It would increase noise, traffic, parking, and crime. How would police and AFR gain access to violence or fires in backyard areas? How would mail and packages be delivered? Who will be willing to pay increased property taxes because of multi-family dwellings?

Please listen to your long-time, law-abiding, voting residents and oppose this change!

Sincerely,

Maya Sutton, Ph.D., President of the Inez Neighborhood Assn.

**From:** [Peter Swift](#)  
**To:** [City of Albuquerque Planning Department](#)  
**Cc:** [Foran, Sean M.](#); ["Elen Feinberg"](#); [Mayor Keller](#)  
**Subject:** No on O-22-54  
**Date:** Saturday, November 26, 2022 12:45:54 PM  
**Attachments:** [EF PS Letter to EPC 26Nov2022.pdf](#)

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**[EXTERNAL]** Forward to [phishing@cabq.gov](mailto:phishing@cabq.gov) and delete if an email causes any concern.

Our letter to Mr. Timothy MacEachen, Chair of City of Albuquerque Environmental Planning Commission, regarding O-22-54, Mayor Keller's proposed transformative zoning changes, is attached.

We are requesting that the EPC withhold approval of O-22-54 until further analysis of its impacts is completed and provided to City residents.

To summarize, we believe that there has been insufficient time for public discussion of the proposal. We are concerned that in neighborhoods with guaranteed long-term demand for short-term rentals (specifically, those near the University of New Mexico main campus), the impacts of the changes will be counterproductive to the goals of the IDO, and will encourage the irreversible transformation of stable and diverse family neighborhoods into transient rental communities.

Thank you,

Peter Swift and Elen Feinberg

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Elen Feinberg and Peter Swift  
613 Ridge Place NE  
Albuquerque, NM 87106  
[pnsswift@comcast.net](mailto:pnsswift@comcast.net)  
505 379 3201 (mobile)

From:

Elen Feinberg and Peter Swift  
613 Ridge Place NE  
Albuquerque, NM 87106

To:

Timothy MacEachen  
Chair, Environmental Planning Commission  
City of Albuquerque

November 26, 2022

Subject: Request to withhold approval of O-22-54

Dear Mr. MacEachen,

We are writing to express our concerns about proposed changes to the City's Integrated Development Ordinance (IDO) contained in O-22-54, and to request that the Environmental Planning Commission withhold approval of O-22-54 until further analysis of its impacts.

We have a major concern with the process by which these changes are being proposed. We consider ourselves well-informed residents of Albuquerque, and yet we learned of these proposed changes for the first time on November 11, 2022, when the Albuquerque Journal published a summary of the "transformative" updates to the zoning code. As we understand it, the City held one public meeting (by Zoom) after this announcement, which we were unable to attend, and the opportunity for public comment closes November 28, less than three weeks after most of the City first learned of the proposal. Surely, truly transformative zoning changes (which these appear to be) deserve more public discussion than this. We have seen no analysis by the City of the impacts of the changes, nor of the alternatives that were considered.

As we understand the proposed changes, they will create permanent and irreversible changes in R-1 zones throughout the City, doing away with zoning support for the concept of neighborhoods composed primarily of single-family homes. In the neighborhood where we live, within walking distance of the University of New Mexico main campus, changes are likely to happen quickly as single-family homes convert to duplex rental units. We recognize that this may in fact be exactly what the City intends, and if so, we believe it will eventually prove to be an unfortunate mistake. Impacts of this zoning change may be incremental and proportionally small in much of the City, but they are likely to be large in the University neighborhoods where the long-term demand for temporary rental property is guaranteed. Once begun, the transformation of stable family neighborhoods into transient rental communities is likely to snowball rapidly.

We urge the City to reconsider the rapid implementation of O-22-54, allowing time to provide the affected communities with documentation of a full analysis of impacts and alternatives. Specifically, we request that the EPC withhold its approval of O-22-54.

Thank you,



Elen Feinberg and Peter Swift



**From:** [Mary Thorn](#)  
**To:** [City of Albuquerque Planning Department](#); [Lehner, Catalina L.](#)  
**Cc:** [Benton, Isaac](#); [Jones, Trudy](#); [Ortega, Crystal L.](#)  
**Subject:** IDO 2022-23 Update  
**Date:** Friday, November 25, 2022 10:36:07 AM

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**[EXTERNAL]** Forward to [phishing@cabq.gov](mailto:phishing@cabq.gov) and delete if an email causes any concern.

I have attached a letter on behalf of the newly revitalized Los Griegos Neighborhood Association Board of Directors.

We are requesting that the Environmental Planning Commission and Albuquerque City Council consider allowing Accessory Dwelling Units (casitas) on properties zoned R-A in addition to the proposal to do so in R-1 zoned properties. Doing so would add consistency to how things are done within our neighborhood association boundaries in addition to possibly helping with our area's housing shortage.

Thank you in advance for your time and attention to this.

Sincerely,  
Mary Beth Thorn  
President-Los Griegos Neighborhood Association



## Los Griegos Neighborhood Association

25 November 2022

Tim MacEachen, Chair  
Environmental Planning Commission  
c/o City of Albuquerque Planning Department  
600 Second Street NW  
Albuquerque NM 87102

RE: 2022 IDO Annual Update – O-22-54: Housing opportunities

Dear Mr. Chair,

The newly reactivated Los Griegos Neighborhood Association (LGNA) is grateful for this opportunity to provide comments on the 2022 IDO Annual Update, specifically Council Bill O-22-54: Housing Opportunities. The area within the LGNA is zoned mostly residential, with the majority of the land area being the R-A zone district. In the map below, the pale yellow that comprises most of the western 2/3 of the LGNA area is the R-A zone district. The darker yellow is R-1 and there are some pockets of multifamily and mixed-use zoning along the 12<sup>th</sup> Street and Candelaria Rd boundaries.



The proposed legislation, O-22-54, extensively addresses the R-1 zone district in the Whereas clauses that support amendments to the R-1 zone district in 14-16-2-3(B) as well as corresponding changes to Allowable Use Table 4-2-1 and the Use Specific Standards (USS) of 14-16-4-3(F)(5)(a). The LGNA supports all these proposed updates to allow permissive, accessory "casita" units, but respectfully requests that these same land use entitlements and housing opportunities be afforded to the R-A zone district.

The R-A zone district, with its larger lot size requirement, can accommodate a casita as readily as the R-1 zone district per the proposed updates to Use Specific Standard 14-16-4-3(F)(5)(a). Casitas are also appropriate for the LGNA area given its history as one of the first villages with extended families that utilized, maintained, and lived along the area's extensive acequia system since its founding. The historic culture and character of the LGNA are reflected in numerous, existing casitas scattered throughout the area that were developed prior to 1959, when the City adopted zoning.

Allowing R-A property owners to legally develop an accessory dwelling unit, with or without a kitchen, per the applicable USS will provide options for more housing opportunities in the LGNA. The area has existing infrastructure and there is no risk of adverse effects on neighborhood character or integrity. Please support our request by recommending that the R-A zone district be included in the language of Council Bill O-22-54.

Respectfully,

A handwritten signature in cursive script that reads "Mary Beth Thorn".

Mary Beth Thorn  
LGNA President

Cc: Councilor Isaac Benton  
Councilor Trudy Jones  
Crystal Ortega, Clerk of the Council



**From:** [Nancy Traylor](#)  
**To:** [City of Albuquerque Planning Department](#)  
**Cc:** [Near North Valley NA](#)  
**Subject:** In support of ADUs  
**Date:** Monday, November 28, 2022 12:17:44 AM

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

Dear Planning Commissioners-

In 2006, I coordinated a steering committee for the Near North Valley Neighborhood Association which conducted a lengthy process to develop a sector plan for our area. A key element of the plan was the inclusion of accessory dwelling units within our boundaries. Our plan was not brought before the Planning Commission or Council as the North 4th Plan took precedence at that time.

As a member of the current NNVNA Board, we are now engaged in an effort to revive this initiative and intend to mount public input opportunities to support the legitimacy of existing secondary housing units and provide for future units.

As an individual, I believe properly-regulated secondary units in R-1 zoning create affordable housing for all ages, encourage multi-generational living arrangements, provide income for property owners, and support local schools and businesses through infill development. They have the potential to increase property values. And given our current and increasing housing crisis, the approval of ADUs is such an obvious and logical step.

Nancy Traylor, NNVNA Board Member=

**From:** [Mike Voorhees](#)  
**To:** [Lehner, Catalina L.](#); [City of Albuquerque Planning Department](#)  
**Cc:** [René Horvath](#)  
**Subject:** Fwd: Submission of Recommended Change to the IDO Under 14-16-6-3(D)(1)  
**Date:** Monday, November 28, 2022 12:24:59 AM  
**Importance:** High

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

\*\*\*Please acknowledge receipt and confirm if this proposal will be included in the Staff Report.\*\*\*

Catalina,

On October 12, 2022, I sent the below email to the [abcto@cabq.gov](mailto:abcto@cabq.gov) address, submitting a recommended change to the IDO. To date, I have received no acknowledgement of this submission. I am again submitting this for inclusion in the current Staff Report for this year's round of proposed IDO changes. Please let me know that you received this and if it will be included in the Staff Report.

Sincerely,  
Michael T. Voorhees

Begin forwarded message:

**From:** Mike Voorhees <[mike@cyonic.com](mailto:mike@cyonic.com)>  
**Subject:** Submission of Recommended Change to the IDO Under 14-16-6-3(D)(1)  
**Date:** October 12, 2022 at 10:54:28 AM MDT  
**To:** [abcto@cabq.gov](mailto:abcto@cabq.gov)  
**Cc:** Rene' Horvath <[aboard111@gmail.com](mailto:aboard111@gmail.com)>, "Hendricks, Nancy E" <[Nancy\\_Hendricks@nps.gov](mailto:Nancy_Hendricks@nps.gov)>, [legacy@cybermesa.com](mailto:legacy@cybermesa.com)

TO: Planning Department Personnel

This is a submission of a recommended change to the IDO under 14-16-6-3(D)(1).

14-16-6-3(D)(1) **Anyone may submit recommended changes to the Planning Department *throughout the year***, particularly during the CPA assessment process, as set out in Subsection 14-16-6-3(E)(1) (Community Planning Area Assessments).

Please include the following recommended change in the Planning Department submission to the EPC hearing in December:

Remove the words "low density residential" and replace with the word "all" in 14-16-3-4(N)(1) Applicability, as shown below.

**14-16-3-4(N)(1) Applicability**

The CPO-13 standards apply to ~~low-density residential~~ all development in the following mapped area. Where the CPO-13 boundary crosses a lot line, the entire lot is subject to these standards.

**Rationale for change:** The current limitation on the applicability of the Volcano Mesa CPO-13 is inconsistent with the explicitly stated policies for view protection and cultural heritage protection of the Comprehensive Plan as well as the policies from the Volcano Cliffs Sector Development Plan that were specifically incorporated into the Comprehensive plan. This includes the limitations on mixed-use development that was supposed to "provide for small offices, shops, community facilities, or townhouses with ground-floor home occupations including office, retail, and service activities at the neighborhood scale extending goods and services to locations that may not be able to support major retail." These concerns were affirmed in the recent decision by the ZHE, but ongoing proposals to build multiple three-story structures continue to threaten the character of Volcano Mesa and are incompatible with the intent of CPO-13, and the Vision, Goals, and Policies of the Comprehensive Plan.

Thank you for your attention in this matter.

Sincerely,  
Michael T. Voorhees

**From:** [Caryn Wagner](#)  
**To:** [City of Albuquerque Planning Department](#)  
**Subject:** The increased density proposal from the mayor  
**Date:** Sunday, November 20, 2022 2:17:57 PM

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

Dear Timothy,

We are long time residents in the Spruce Park neighborhood, and we are represented by our neighborhood association. It recently came to my attention that the mayor wants to explore the idea of allowing single family homes to be turned into duplexes by investors and allowing casitas to be rented on such properties. I feel that if casitas could house elderly parents of the homeowners or their children to keep them nearby, that would be acceptable to me, but not to turn them into rentals.

I don't know how familiar you are with our particular neighborhood, but it has a number of historic homes, and most of the occupants are long time residents. Our grown children have bought two properties on our street, renovated them beautifully, and are raising their families in our tight community. The few owners who have treated their houses as rentals have created pockets of saddened properties rented out to students who have caused many problems, and the properties are poorly kept. We are located just west of the university and are sandwiched between MLK and Lomas Blvd. We are all proud homeowners, and many have invested a substantial amount of cash into home improvements. Ours is a special neighborhood consisting of professionals and well educated families. Everyone's home architecture is unique unlike the newer communities that have sprung up in more newly established parts of the city. Some of our homes date back to the 1920s, and governor Clyde Tingley took a vested interest in beautifying the streets, and the trees make the streets very special.

I can't imagine that either you or Mayor Keller, who lives in the country club area, would welcome an influx of renters in your neighborhoods. Making it even more precarious for us is the proximity to the university which could affect our neighborhood much like what we see in the student ghetto just south of Central. Those are primarily rentals, and renters generally do not have the same level of care for their temporary properties, and the population constantly changes as the semesters pass by.

As homeowners, we all make continuous efforts to meet and know our neighbors through neighborhood association events, park parties for families, round-robin dinners, and walking ourselves and our children through the streets on a daily basis. This is what homeownership creates for a community. It is unlikely that a homeowner would have any inclination to either neglect or trash their property as we often see from renters where the owners are not living on the properties.

Please accept my letter as a concerned disapproval for this proposal from Tim Keller. There are far better places to create high density housing such as along MLK where there already are apartments. I will be there for the December 8th hearing, and I hope that my fearful concerns don't come to pass. If we truly are in need for more housing, the solution shouldn't be foisted on the backs of people who have made this city safer and more beautiful.

Respectfully,

Caryn & Stephen Wagner, 1215 Las Lomas Rd. NE

Sophie (Wagner) Woehrle & Chris Woehrle, 1205 Las Lomas Rd. NE

Gwen and Oliver Wagner, 1513 Las Lomas Rd. NE=

**From:** [Louis Wilcox](#)  
**To:** [City of Albuquerque Planning Department](#)  
**Subject:** I support ADUs  
**Date:** Sunday, November 27, 2022 2:04:57 PM

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**[EXTERNAL]** Forward to [phishing@cabq.gov](mailto:phishing@cabq.gov) and delete if an email causes any concern.

Hello,

Im just writing to support ADUs in Albuquerque. Allowing reasonable and realistic code and zoning allows people to participate in using their.own property to make extra money, while s

Helping to solve housing and density issues in ABQ. Please support it!

Sent from my T-Mobile 4G LTE Device

Get [Outlook for Android](#)

November 26, 2022

Via email: [abcto@cabq.gov](mailto:abcto@cabq.gov)  
EPC Chair Timothy MacEachen

Re: RZ-2022-00054 – Text Amendments to IDO – Citywide  
RZ-2022-00059 – Text Amendments to IDO – Citywide (Housing Forward)  
RZ-2022-00055 – Text Amendments to IDO – CPO 9 – North Fourth Street  
RZ-2022-00056 – Text Amendments to IDO – VPO-2 – Northwest Mesa

Chairman MacEachen,

As President of the Victory Hills Neighborhood Association (VHNA), Treasurer of the District 6 Coalition and Representative to the Inter-Coalition Council, I have helped draft several statements regarding the 2022 Annual Update to the Integrated Development Ordinance (IDO).

However, these comments are my own, as practicing professional Architect licensed in the state of New Mexico since 1987. Early in my career, I worked for several major firms in the city, including Hutchinson Brown and Partners, Fanning Bard Larson, Holmes Sabitini and Eeds and Dekker Perich Sabatini. I have operated as a Principal of Willson + Willson Architects since 1990.

<https://willsonstudio.com>

I am addressing the cases referenced above in reverse order:

- RZ-2022-00056 – Text Amendments to IDO – VPO-2 – Northwest Mesa

This Small Area Amendment could lead to 4-story buildings in an area where height limitations are a major issue; therefore I do not support this amendment. Though I cannot confirm, I understand that this change was proposed by a developer—another reason the source data for amendments is so critical.

- RZ-2022-00055 – Text Amendments to IDO – CPO 9 – North Fourth Street

This is a good example of what a text / textual amendment should be; fixing a simple mistake to recognize that buildings on 4<sup>th</sup> street could be facing a side street. It is not a substantive change and I would support this amendment.

- RZ-2022-00059 – Text Amendments to IDO – Citywide (Housing Forward)

I am 100% OPPOSED to including O-22-54 as a Text Amendment to the IDO. The Comprehensive Plan's map of Areas of Consistency shows the vast range of the city that would be effectively doubled (or tripled) in density were this to pass. Once something is made Permissive, it never goes back to Conditional. If passed, make it Conditional and hire more planning staff!

- RZ-2022-00054 – Text Amendments to IDO – Citywide

I ask—no, beg—that the Annual Update Process include specific source data, examples, beneficiary information, risk analysis, impact statements and summaries of public comment. Other letters (Parkland Hills NA, for example) have done a more thorough job addressing the spreadsheet of 49 items; I will defer to their comments.

I will address Items 26, 27 and 28, which address Walls & Fences. The Planning Director has repeatedly said a majority of variance requests are for higher walls in the front yard setback—what are the data pertaining to that? Exactly how many requests are we talking about? Last year's comments repeatedly referenced information about 'eyes on the street', higher walls increasing crime rather than deterring crime, etc., etc.. The EPC's Notice of Decision on 12/16/21 said,

November 26, 2022

Page 2

Via email: [abcto@cabq.gov](mailto:abcto@cabq.gov)  
EPC Chair Timothy MacEachen

"Maximum permissive wall height (Wall Permit-Minor) would continue to be 3 feet in residential, mixed use, and non-residential zones." Many community members were greatly relieved by this decision. Yet, at a luncheon presentation to architects the following summer, Director Varela noted that this proposed change would re-appear in the 2022 Annual Update.

The concept of "transparency" is another issue. The requested change proposes a 5' permissive wall: 3' of solid wall topped with 2' of "view fencing". The IDO definition of View Fencing is "A wall that is at most 25 percent opaque to perpendicular view unless specified otherwise in this IDO..." However, there is no definition of the thickness of this view portion—concrete masonry units laid on their side are about 50% open only when viewed straight on. With any move off of perpendicular, the "view" disappears. This also happens with vertical wrought iron bar: a drive through the South Los Altos Neighborhood makes this painfully clear.

The change for 'Options for a Taller Front or Side Yard Wall' changes the distance from "<10 ft." to "<2 ft." from the property line. Many people do not know where their property line is; they think it is at the back of the sidewalk. There is a Variance Request pending in my neighborhood where the homeowner did not give the designer a survey, the designer failed to do due diligence and showed the property line actually in front of the curb, and city plan review failed to catch that error and approved the plans...in my opinion, they all share the blame for this mistake.

In summary: I am opposed to Item 26 and 27. I would support Item 28 ONLY if the definition of View Fencing is clarified to include thickness and if an accurate survey with posted corners is required.

I have included 4 additional PDF pages showing examples. I appreciate the work of the EPC and LUPZ, and hope that in future Annual Updates there could be a deadline after the first two steps of the process. Changes at Council could become the start of the following year's list rather than last minute Floor Amendments.

Thank you.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "P.D. Willson". The signature is stylized with a large, sweeping initial "P" and a long, horizontal flourish at the end.

Patricia D. Willson, AIA  
Willson + Willson Architects, LLC



November 26, 2022

Via email: [abcto@cabq.gov](mailto:abcto@cabq.gov)  
EPC Chair Timothy MacEachen

Re: RZ-2022-00054 – Text Amendments to IDO – Citywide  
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RZ-2022-00056 – Text Amendments to IDO – VPO-2 – Northwest Mesa

Chairman MacEachen,

Both the District 6 Coalition (D6) and the Victory Hills Neighborhood Association (VHNA) support comments submitted by both the Inter-Coalition Council (ICC) and the Parkland Hills Neighborhood Association (PHNA)—even though those documents are not in complete agreement!

- RZ-2022-00054 – Text Amendments to IDO – Citywide

The ICC requests that the Annual Update Process include specific source data, examples, beneficiary information, risk analysis, impact statements and summaries of public comment. Last year's update included a watered-down version of this request—which is much appreciated—however, the addition of a column labeled 'Source' and identifying 'Staff', 'Admin', 'Public', etc., is hardly enough. Even so, we ask that you LISTEN to the comments submitted online; for example, there are currently sixteen comments pinned to the Walls & Fences amendments—all are in OPPOSITION. This was soundly defeated last year; why must we review it again?

- RZ-2022-00059 – Text Amendments to IDO – Citywide (Housing Forward)

This ordinance presents 'transformative' changes intended to mitigate the City's housing crisis. The ICC posed questions about the data and the unintended consequences of these dramatic proposals and stands in OPPOSITION to the adoption of these Amendments. PHNA supports Sections 1 & 2 (changing R-1 to two-family and allowing ADU's permissively) with sensible ADDED CONDITIONS and OPPOSES others. D6 and VHNA agree that O-22-54 should not be included in the IDO update, but assuming this Ordinance will be pushed through, then include the protections outline by PHNA!

D6 and VHNA again suggest that the IDO Annual Update process is not the place to make major, substantive changes to the City's zoning code; once something has become Permissive instead of Conditional, it is nearly impossible to walk it back.

- RZ-2022-00055 – Text Amendments to IDO – CPO 9 – North Fourth Street

Upon review this seems like an appropriate change that D6 and VHNA support.

- RZ-2022-00056 – Text Amendments to IDO – VPO-2 – Northwest Mesa

This Small Area Amendment could lead to 4-story buildings in an area where height limitations are a major issue; therefore D6 and VHNA do not support this amendment.

The city website describes the update process as a three-step process; first EPC, then LUPZ, then full City Council. We believe there should be a cut-off deadline after step two and that further changes would go on the list for the following year rather than being introduced as last minute Floor Amendments at Council.

Respectfully submitted,

Dr. Peter M. Belletto, President, D-6 Coalition  
Patricia Willson, President, Victory Hills Neighborhood Association

**From:** [P. Davis Willson](#)  
**To:** [City of Albuquerque Planning Department](#)  
**Cc:** [Lehner, Catalina L.](#)  
**Subject:** final comment before 9am deadline today, Nov. 28th  
**Date:** Monday, November 28, 2022 7:54:27 AM

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**[EXTERNAL]** Forward to [phishing@cabq.gov](mailto:phishing@cabq.gov) and delete if an email causes any concern.

Chair Timothy MacEachen,

You have received many emails from individuals, neighborhood associations, coalitions and the Inter-Coalition Council. They are not all in agreement—for example, some favor ADU's (with conditions), some are 100% opposed. However, I have not seen one comment yet in favor of increasing the 3 ft. permissive front yard wall height. And I urge you to pay particular attention to Deborah Conger's email—she makes excellent points about enforcement.

In trying to help folks understand the process—and what's at stake—I put together several links for review. **I am including this for the record.** It is critical that more community members become aware and involved in the process, and the effort by a small group of volunteers to improve this process.

Background on the city's zoning history/process is located on the main IDO page:  
<https://ido.abc-zone.com/background-coordination-abc-comp-plan>

Then spend some time clicking around the Home page from the 'Background' link above:  
<https://ido.abc-zone.com>

This 84 page PDF explains the total number of changes (~62, in four separate cases) that will be heard at EPC. [https://abc-zone.com/sites/abc-zone.com/files/media/IDO-Annual-Update-2022-Post-submittalPre-EPC-Review-2022-11-18-print\\_0.pdf](https://abc-zone.com/sites/abc-zone.com/files/media/IDO-Annual-Update-2022-Post-submittalPre-EPC-Review-2022-11-18-print_0.pdf)

If you want to hear long range planner Mikaela Renz-Whitmore go thru this pdf, there is a 1 hour presentation here:

[https://cabq.zoom.us/rec/play/W7BK9hc7Acx58z8CNmH47yrzzLXr6t5vyZkc35y-EzfdU1DTphxXUirKj-Wqif4yK0oVgFLnODIGSJr5.44OTcd1RGb0P25BD?continueMode=true&\\_x\\_zm\\_rtaid=i19K-rieT7u6MEq7x-gbZA.1669042788001.058ba442ad8d1e8468f8f1606fc64ba9&\\_x\\_zm\\_rhtaid=964](https://cabq.zoom.us/rec/play/W7BK9hc7Acx58z8CNmH47yrzzLXr6t5vyZkc35y-EzfdU1DTphxXUirKj-Wqif4yK0oVgFLnODIGSJr5.44OTcd1RGb0P25BD?continueMode=true&_x_zm_rtaid=i19K-rieT7u6MEq7x-gbZA.1669042788001.058ba442ad8d1e8468f8f1606fc64ba9&_x_zm_rhtaid=964)

Go here to understand the three step process the city goes thru in the IDO Annual Update process: <https://abc-zone.com/ido-annual-update-2022>

And back out to the main ABC to Z planning website for links to the Comprehensive Plan, the IDO, the CPA's and to sign up for updates: <https://abc-zone.com>

And now if you're ready to make comments on the online interactive spreadsheet (but this does not include the 6 changes introduced at Council—O-22-54), go here (make sure to put your full name and email when you post a comment): <https://ido.abc-zone.com/ido-annual-update-2022-epc-submittal-citywide-proposed-changes>

Additional comments (anything regarding O-22-54) should be sent to [abcto@cabq.gov](mailto:abcto@cabq.gov) and addressed to EPC Chair Timothy MacEachen. Comments received by Monday, Nov. 28th 9am, will be included in the Staff report. Comments received by Dec 6 will be included in EPC member's packets. If you want to know who is on the Environmental Planning Commission, go here and click on the Membership box:

<https://www.cabq.gov/planning/boards-commissions/environmental-planning-commission>

The inclusion of O-22-54 in the 2022 IDO Annual Update Process is an insult to the public, to the Comprehensive Plan, and to the entire concept of how and why the zoning code needs to stay current. For the Mayor to claim that a five year old ordinance is outdated is just not right. Pete Dinelli said it best in his November 15th post

<https://www.petedinelli.com/2022/11/15/mayor-tim-keller-seeks-transformative-changes-to-integrated-development-ordinance-ido-to-favor-developers-despite-apartment-construction-boom-announces-housing-forward-ab/>

"The enacted Integrated Development Ordinance has provisions to allow the City Council to adopt major amendments and make major changes to it. The IDO blatantly removes the public from the development review process, and it was the Planning Department's clear intent to do so when it drafted the IDO."

Chair MacEachen, my thanks to you and the rest of the EPC for all your hard work. My final thoughts are these: 1) incorporate metrics to determine whether a proposed amendment is textual or substantive, and 2) add a deadline to the City's three step process that cuts off additional amendments after LUPZ review—put them on the list for the next year's amendments rather than allowing the full Council barrage of Floor Amendments, often happening late at night with no public input.

Respectfully,

Patricia D. Willson, AIA

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December 1, 2022

Alfredo Salas  
Hearing Monitor for the EPC  
Alb, NM 87102

Dear Mr. Salas;

After living in a lovely R-1 neighborhood for 42 years, I am strongly opposed to the proposed changes to the IDO (zoning code) to allow for a smaller secondary dwelling in the back yards. Presently, this arrangement is nowhere in the IDO. The IDO (14-16-2) p. 9, gives the ZONING DISTRICTS. The City is laid out in Zoning Districts and the IDO does not intermingle properties which fit in different Zoning Districts. The first Zoning District is RESIDENTIAL-SINGLE-FAMILY-ZONE DISTRICT, 2-3(B), pg. 15. There are diagrams, charts, specification and lot set back pictures pertaining to building in an R-1 zone. This proposed change would intermingle properties qualifying for (R-ML) MULTI-FAMILY LOW DENSITY ZONE DISTRICT, pg. 21. in the R-1 properties. This section also includes diagrams, charts and specifications.

Rushing into some quick zoning rewrite to hopefully solve a short term affordable housing shortage is not the way. There is no guarantee the housing would be affordable given the high price of construction. This certainly would come with unintended consequences such as policing shortages and aging infrastructure and many more.

Thank you for your consideration.

Respectfully,

Donna Yetter  
Secretary/Treasurer of Inez Neighbor Association  
2111 Hoffman Dr. N.E.  
Alb, NM 87110  
donna.yetter3@gmail.com