



Santa Fe Village Neighborhood Association

5601 Bogart Ave. NW Albuquerque, NM 87120
SFVNA2014@gmail.com

Date: December 5, 2022

To: Timothy MacEachen
Chair, EPC

From: Jane Baechle
SFVNA

Re: 2022 IDO Annual Review

The Santa Fe Village Association has already submitted initial comments regarding selected proposals for amendments to the Integrated Development Ordinance (IDO). These are included in the staff report and reflected in the agenda for the upcoming Environmental Planning Committee (EPC) meeting on 12/8/2022. This document affirms our positions outlined in our initial comments and reflects our consideration of the planning staff analysis and comments and points made during the EPC study session held on 12/1/2022. It has the support of the SFVNA Board.

PR-2018-001843-RZ-2022-00056_VPO-2 Small Area Amend

The SFVNA Board and several SFV residents who have communicated with the Board remain strongly *opposed* to the changes in the NW Mesa Escarpment View Protection Overlay and consider their impact, if adopted, profoundly deleterious to the Petroglyph National Monument, the escarpment and the sacred landscape of the entire area. We are grateful for the recommendation of ABQ Planning Department staff for *denial* of this proposed amendment and its analysis which affirms our view of the negative impact and conflict with the protection of ABQ cultural heritage sites of this proposal. The staff report outlines further conflicts with additional goals and policies of the ABC Comp Plan and supports the consistent application of the citywide rule re: the delineation of areas included in protection overlays in designated small areas across the city. We respectfully ask the EPC commissioners to accept the views of the NPS, SFVNA and other ABQ residents and the recommendation of Planning Staff on this matter.

PR-2018-001843-RZ-2022-00059_Housing_Citywide

The SFVNA continues to *oppose* the majority of the proposals outlined in O-22-54. The substance of our opposition is outlined in our initial comments and the staff report largely fails to address the potential deleterious effects of these proposed zoning changes on SFV. Santa Fe Village is an extremely compact neighborhood with more than 1000 homes. The potential increase in density in an already small geographic area if even a relatively small percentage of homeowners redevelop single family dwellings into two family homes or add an ADU would be profoundly deleterious to the scale and sense of place of SFV.

This entire proposal rests on assumptions about the expected contribution of these changes to increasing affordable housing stock and assertions that effects will be neither harmful or can be easily mitigated.

Among those assumptions for which no evidence is provided are:

- Any increase in housing stock, of any type or location, will effectively be considered desirable, accessible and affordable to those seeking housing.
- Existing development standards, required setbacks and parking requirements, will prevent any change to neighborhood scale or character.
- Redevelopment to create a two family home will minimally increase the lateral footprint of the structure and not alter the vertical height of the building (although in our Pre-EPC Open House session it was made clear that a conversion to a two family residence could be accomplished by adding an additional story).
- That all developments will be permitted, designed consistent with IDO requirements and those will be enforced by ABQ Code Enforcement.
- That these changes will lead to affordable housing construction while previous incentives have failed to do so. Perceived barriers to the construction of additional housing cited at the EPC Study Session, ie lack of work force, construction costs and a hot housing market with high demand, are really not addressed in these proposals.
- That any increased housing stock will lead to decreased housing costs.
- That the City will enact measures to protect residential neighborhoods near mixed use zones from becoming the on-street default for parking when multi-family residents have no off street parking available.
- That there are areas of the city outside of Centers and Corridors or UC-MS-PT areas where public transit is sufficient to permit one to get to work, school or activities of daily living without a personal vehicle.
- That it is prudent for the City to relinquish its authority to establish and enforce any parking requirements. Once a standard is lifted or eased, it is unlikely to be re-established.
- That developers will assure equity in the provision of parking for multi-family residents who use housing subsidies vis-a-vis those paying market rates.
- That removing height restrictions in mixed-use zones will have limited impact because buildings over 3 stories tall are more expensive to construct.
- That using the IDO Annual Review process to enact highly impactful and durable changes to zoning law is consistent with ABC Comp Plan goals and policies to assure public engagement. Few ABQ residents have any awareness or understanding of the IDO or the Annual Review

Process. Fewer still have the time and resources to engage in the process, attend Planning Dept., EPC or Council meetings, review complex zoning language and respond to proposals and changes, some introduced within days of a meeting where an issue will come to a vote.

We respectfully ask the EPC to accept the recommendation of Planning Staff to *defer* this item for consideration to the January 2023 EPC meeting. At a minimum, proposals of this scope and potential impact deserve adequate time to be fully vetted including public comments and Planning staff recommendations.

PR-2018-001843-RZ-2022-00054 Citywide General Amend

Walls and Fences-IDO Subsection 14-16-5-7(D)(3)(a) and (b), Table 5-7-2, p. 320, 321 and 322

The SFVNA Board continues to *oppose* provisions which would make wall heights of 5' with the upper 2' view fencing and a 2' setback permissive. Again, SFV is a very compact neighborhood, most streets are curving to follow the contour of the land. With the exception of Unser Blvd and open space along the east of the neighborhood, it is surrounded by the escarpment. The addition of taller walls even with view fencing, and particularly the potential of adding view fencing to an existing 3' wall on the lot line, "would not constitute context-sensitive streetscape design and would not reinforce an established sense of place." Our SFVNA Board has never received a concern or request from a SFV resident expressing a desire or perceived need for a taller front yard wall. A number of homeowners have courtyard walls in the front of their homes; they are well setback from the street and sidewalk and pose no negative effects on the streetscape, on clear lines of sight or on the ability of pedestrians to comfortably walk along the sidewalk. The existing IDO allows for taller walls and for courtyard walls for those who wish for front yard privacy or a barrier for children and pets. We respectfully ask the EPC to also *oppose* this change for low-density residential neighborhoods.

Thank you for your consideration.



29 November 2022

Environmental Hearing Commission
City of Albuquerque Planning Department
Plaza del Sol Building
600 Second NW
Albuquerque, NM 87102

RE: Letter of Support - ABQ Downtown Housing Forward - 2022 Annual IDO Update

Dear Commisisoners,

We write to you in support of the bulk of the proposed 2022 Annual IDO Update. We also deeply appreciate our partnership with the City of Albuquerque's current administration and City Council toward integrating more smart and equitable development.

in the midst of a national housing crisis, and with unique challenges of our own here in ABQ, increasing density must be an urgent priority. We are in full support, and pleased to see, proposals that will help meet the housing crisis challenge: Allowing two-family dwellings on more lots in Albuquerque, reducing parking requirements and height restrictions for multi-family properties, and making hotel conversions easier by removing many kitchen requirements.

Rather than a blanket removal of height restrictions, we would instead prefer to see the following changes, which still allows for maximizing density, but in a way we believe also better supports commercial activity:

- As outlined in the current Comp Plan, greatly intensify density in Centers + Corridors
- In areas outside of Overlay Districts, incentivize density with height bonuses

Hope this finds you well, and as always,

Mil gracias!

A handwritten signature in blue ink, appearing to read "KR", with a long horizontal flourish extending to the right.

Keith Romero
Board President
Barelas Community Coalition

From: [Debbie-South Los Altos](#)
To: [City of Albuquerque Planning Department](#)
Cc: [Lehner, Catalina L.](#)
Subject: 48 hour rule email: 5-7-(D)(3)(a) - walls & fences higher than 3 feet proposed as Permissive - OPPOSED
Date: Monday, December 5, 2022 5:35:49 PM

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

Chair Tim MacEachen (via email to abcto@cabq.gov)
Environmental Planning Commission (EPC)
City of Albuquerque

Chair MacEachen:

I am unable to attend the meeting and give public comment on December 8 due to work commitments. However, I want to reiterate my opposition to making walls & fences higher than 3 feet permissive in the IDO. I thank the EPC for listening to the public last year about this and hope you will do the same this year.

Below is a bullet list of some of my points of opposition. Please see my November 28 email, which should be in the staff report, for detail.

- Walls or fences higher than 3 feet should not be allowed as Permissive. Even "transparent" is not necessarily transparent the spacing of iron fencing and block pillars. Clear-sight triangles and mini-clear-sight triangles are routinely violated because of this. This is a traffic safety issue.
- As written, this amendment seems to allow 5 foot chainlink fences in front yards. This will make our neighborhoods look like prison yards. Please do not allow this.
- Tall walls and fences give criminals places to hide. We instead need "eyes on the street". This is a safety issue.
- Neighborhoods in many parts of the city are walkable, friendly, and safe precisely due to the lack of high walls. Fortresses should not be the default in neighborhoods. For all the reasons that others articulate too, please do not change this section of the IDO.

Respectfully,
(via email)

Deborah Conger

A long-time resident of the South Los Altos neighborhood (Eubank west to Wyoming, Central north to Copper)

Albuquerque NM 87123

cell: 505-340-6949

[email: debsla@swcp.com](mailto:debsla@swcp.com)

From: [Kenzie Davison](#)
To: [City of Albuquerque Planning Department](#)
Subject: IDO Public Comment
Date: Monday, December 5, 2022 5:37:17 PM

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

Hello -

Thank you for taking the time to read and document my public comment.

I am reaching out to share my support for adapting policy in order to use old hotels as transitional housing.

Section 4-3(B)(8)(e)

Please let me know if you have any questions.

Warmly,

Kenzie Davison

71 Primera Camino Agua Rd

Tijeras, NM 87059

I do actively work and participate in the majority of my recreational activities in Albuquerque.

From: [JULIE DREIKE](#)
To: [City of Albuquerque Planning Department](#)
Subject: 48 Hour Material; Suggestions for IDO Annual Update 2022
Date: Tuesday, December 6, 2022 7:03:45 AM

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

Chair Tim MacEachen (via email to abcto@cabq.gov)
Environmental Planning Commission (EPC)
City of Albuquerque

Chair MacEachen and EPC Members:

I have previously submitted comments to be included in the staff report. Since this update to the IDO has areas major issues of concern to me and others, I am sending this email to meet the 48 hour deadline. The comments below highlight concerns.

- Fences--a proposal to change this was defeated last year. The administration has submitted it again, appearing to not listen to the community wishes. I have heard that this is being submitted because the administration has heard from individuals, yet not one comment has been made on the interactive IDO amendments in support of this change. Neighborhood Associations, including the ICC which I am a member of, submitted comments and or letters in opposition to this change. Please listen to those who have taken the time to consider this change carefully and took the time and energy to submit comments.
- Housing Forward--As I have spoken with neighbors and friends about the proposed change to R-1 they are in shock and dis-belief that such a change would be considered. People made their biggest investment in their homes in R-1 for a reason. If they had wanted to live in multi-family area, they would have made a different investment. This change does not align with the communities Comprehensive Plans. The ICC submitted a letter that included critical questions about this major change. Without any data on the effects of casitas on the rental market, how can fact based decisions be made? This is bad public policy
- Definition of Kitchens--While I am in agreement that affordable housing is needed, I disagree with the city plan to provide substandard kitchens. This public policy decision is in conflict with the health and well-being of those who will need the affordable housing. Substandard kitchens do not support healthy diets and result in food purchases that are more expensive. Pre-packaged food that can be prepared in the proposed substandard kitchens are high in fat, salt and sugar. New Mexico has a higher rate of diabetes and obesity than most of the surrounding states. This public policy decision is in conflict with other public policy--we spend tax payer dollars on educating people on health diets, yet don't provide a kitchen that allows them to follow that education. A kitchen that does not allow for cooking healthy meals, no freezer space for left overs or buying food on sale, no room for storing fruits and vegetables. For example, WIC

provides support for healthy diets. If public policy is to support breaking the cycle of poverty, it must be aligned to do so. Please consider the broad implications of this definition.

- I know others have submitted comments regarding the overall IDO update process. This is only my second round of involvement and have been surprised by the major changes that are proposed and the process of review.

Thank you for your service on the EPC.

Respectfully submitted,
Julie Dreike

From: [peter kalitsis](#)
To: [City of Albuquerque Planning Department](#)
Subject: Additional Comments for the EPC regarding IDO Annual Update 2022
Date: Monday, December 5, 2022 8:41:14 PM
Attachments: [IDO CHANGES KALITSIS COMMENTS TWO 12 5 22.pdf](#)

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

Attention: Chair MacEachen

I am attaching my second set of comments for review and consideration for the December 8, EPC meeting. 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

To: Attention: Chair MacEachen

December 5, 2022

Email abcto@cabq.gov

Re: Additional Comments for the EPC regarding IDO Annual Update 2022 including both:

- A. EPC Submittal - Citywide Proposed Changes "Printed 10/27/2022"
- B. And
 - **A. O-22-54 City Council Bill proposed changes to the 2022 IDO.**

As a resident of Parkland Hills Neighborhood, I, Peter S. Kalitsis, 921 Pampas Dr. SE, Albuquerque, NM 87108, after release of the Planning Departments review comments, I am sending additional 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.

EPC Submittal - Citywide Proposed Changes

Item 6, pg. 158, 4-3(B)(8)(e) – "Dwelling, Multi-family - Kitchen Exemption for Affordable Housing

Delete this subsection and renumber subsequent subsections as necessary."

PLEASE PASS THIS AMENDMENT for the following included reasons.

O-22-54 City Council Bill proposed changes to the 2022 IDO.

"SECTION 3. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO EXEMPT ALL CONVERSIONS FROM NON-RESIDENTIAL DEVELOPMENT TO MULTI-FAMILY DWELLINGS FROM THE DEFINITION OF KITCHEN"

PLEASE OPPOSE THIS AMENDMENT for the following included reasons.

Additional justification in additional to previously submitted comments:

1. Please refer to my complete previously submitted comments which indicated the minimal cost to include a kitchen with a hotplate/cooktop and a full size refrigerator in addition to the required kitchen sink.
2. As stated in my previously submitted comments that by requiring a burner such as a hotplate/2 burner cooktop, and a full size refrigerator would require, at most, the addition of 2 - 20 amp circuits added to each living unit which would likely cost less than \$2000 per unit, probably less if 20 units were upgraded at one time.
3. If the intent that has been stated is to provide affordable housing for those in need due to inadequate housing availability, providing affordable housing that was supposed to target the poor residents of our community, including the temporarily homeless, taking away traditional food preparation and food storage facilities is not directed towards the lower income population, those least able to afford prepared food that would be needed without a complete kitchen.

4. A probable result of these conversions, without amendments requiring this be affordable housing, is that the more desirable scenario would be for developers to do this conversion to market rate housing. It is clearly logical that, unless affordable conversions are a requirement, the most effective investment by developers would be to create market rate housing. The conversions to market housing is demonstrated with the comment review from the planning department as follows:
 - a. From Planning department review: Project #2018-001843 Case #: RZ-2022-00059 December 08, 2022 Page 27

“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.”
 - b. Further stated on Page 29 - 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.
5. Due to the cost of providing a full kitchen, preferably modified to include a cooktop in lieu of a range, the total cost, including the increased cost of appliances should be no more than \$3000.
6. If there is an issue with this, if the developer could guarantee these units would be “affordable housing units”, the city could provide grants of these additional costs, not to exceed \$3,500 to encourage affordable housing, which could even utilize section 8 funding.

Thank you for your consideration.

Sincerely,

Peter S. Kalitsis,

Cell - 505-463-4356

From: [Michael Leach](#)
To: [City of Albuquerque Planning Department](#)
Subject: IDO Update comments
Date: Monday, December 5, 2022 4:33:46 PM

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

Chairman MacEachen, I attended the zoom meeting last week and commissioner Schaefer brought a good point about the change in the IDO regarding demolition of buildings in the entire metro area that are 50 years old or older. The proposed change as I understand, is all buildings in the metro area will need run by the proposed demolition by City planning in order to get approval that the property does not have historical value to the community. Commissioner Schaefer point was who determines what is historical value? This is arbitrary and just another layer of regulation that we do not need. Therefore, I'm not in favor of this change in the IDO update. If a private enterprise believes their old building has historical value than the private party should make to be placed on the historical register versus having this determined by City planning and bureaucracy.

Regarding affordable housing issues that have come up. I'm generally in favor of properties in the city being allowed to have a casita built on the property and hotels being converted to affordable rental housing. I do have concern about lowering parking requirements. My concern is from a safety standpoint, that if there is less parking on site, this will push renters/owners to park in the street. This could cause major congestion on streets for access for police, fire and ambulance services.

Thank you for considering my comments.

Mike Leach, SIOR
SYCAMORE ASSOCIATES LLC
Industrial & Commercial Real Estate
Michael D. Leach, Licensed NM Real Estate Broker, License 7070
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PO Box 90608
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From: [ELEANOR WALTHER](#)
To: [City of Albuquerque Planning Department](#)
Subject: 2021 IDO Annual Update
Date: Monday, December 5, 2022 10:00:21 PM

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

Dear Chair MacEachen

The Rio Grande Boulevard Neighborhood Association opposes Item 26 of the Citywide Amendments which will allow 5 foot walls in front yard with view fencing for at least 2 feet at top and set back 2 feet. See related row for proposed deletion of Permit - Wall or Fence - Major in Table 6-1-1 and Subsection 14-16-6-6(H). We believe that the increase in the height of fences as permissible will change the character of low density residential neighborhoods. We understand that there are properties where a higher fence is needed say on a busy street, The current variance process allows those cases to be allowed.

We also oppose item 40 of the Citywide amendments which allows Historic Preservation staff to review proposed demolitions of any structures 50+ years old citywide, regardless of whether it is on the State or national historic register, a City landmark, or within a Historic Protection Overlay (HPO). There are many properties in the North Valley which have structures that are older than 50 years. We think this creates an undue burden on property owners.

Eleanor Walther
Rio Grande Boulevard Neighborhood Association, President

From: [P. Davis Willson](#)
To: [City of Albuquerque Planning Department](#)
Subject: 48 Hour Material; Suggestions for IDO Annual Update 2022
Date: Monday, December 5, 2022 2:13:13 PM

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

EPC Chair Timothy MacEachen

To Chair MacEachen and all EPC members:

I know you have received lots of input prior to last week's November 28th deadline for inclusion in the Staff Report. I will not repeat myself here ahead of the 48 hour rule deadline at end of business today, Monday December 5th. But I would like to make a few more comments concerning Walls & Fences (Items 26, 27 & 28). I reviewed comments on the **IDO Annual Update 2022- EPC Submittal - Citywide Proposed Changes** online interactive spreadsheet. There are 21 numbered pins on those three items—all twenty-one comments are in opposition. There is not one comment in support. I copied pieces from just a half dozen of them. Please read them again here:

"Why does this bad idea to raise allowable front wall heights keep coming up? Anyone who has looked at data and studied site design, safety, and security knows that the taller the wall, the less safe and secure is the site."

"these height variances being decided administratively ... communicates an unwillingness from Planning Dept to hear neighborhood voice."

"Changing the rules would create a lot of resentment."

"Turning Abq into a gated community will not foster awareness among neighbors and won't solve any security problems."

"The city has existed for hundreds of years with no fences or 3 ft fences without a related crisis for children or dogs. There is a way for people to request a higher fence."

"Please provide data on how many variance requests there are for higher than 3 ft walls in the front yard setback. If the staff is so burdened by this, there needs to be more staff."

I sincerely hope the EPC listens (again—thank you) to the community—and then Council listens to your Notice of Decision. I know that other individuals, neighborhood associations and coalitions have asked you to consider how the IDO Annual Update process fails to comply with the Albuquerque/Bernalillo County Comprehensive Plan—circumventing the over-riding goals and principles of the ABC Comp Plan by making substantial changes in zoning law. Drastic changes, once done, are never undone.

I will be interested to hear the conversation about converting hotels to housing. There are ways to get closer to a full kitchen in merely 5 ft. of length:

<https://www.summitappliance.com/combination-kitchens>

Respectfully,

Patricia D. Willson, AIA

Willson + Willson Architects

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Albuquerque, NM 87106

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