



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: [Linda Bridge](#)
To: [City of Albuquerque Planning Department](#)
Subject: Public Comment - Proposed Housing Forward changes to IDO
Date: Tuesday, December 6, 2022 7:36:34 AM

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

On behalf of the Albuquerque Housing Authority, we support the proposed changes to the IDO that were referred to the EPC by City Council in Ordinance (O-22-54). As evidenced by the waitlists for our housing programs and the length of time it is taking voucher holders to find a unit to rent, we can speak to the need for more housing units in our City. We support these changes that will help eliminate some barriers to increase availability of housing in the City.

Albuquerque Housing Authority (AHA) manages housing programs for low and extremely low-income households. The average income of the households served is approximately \$14K. Approximately half of the households served are elderly and/or disabled. AHA currently owns and manages 27 multifamily and senior housing developments totaling approximately 1,020 units throughout the municipal limits of the City of Albuquerque and administers approximately 4,000 Section 8 housing choice vouchers.

Thank you for the opportunity to provide comment.

Linda Bridge | Executive Director | Albuquerque Housing Authority
1840 University Blvd. SE, Albuquerque, NM 87106 | Office: 505.764.3999 | Fax: 505.764.3981



Empowering people in our community through affordable housing and self-sufficiency opportunities

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From: [Debbie-South Los Altos](#)
To: [City of Albuquerque Planning Department](#)
Cc: [Deborah Conger](#)
Subject: 48 hour email: O-22-54 comments
Date: Monday, December 5, 2022 5:40:53 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 and give public comments at the December 8 meeting due to work commitments. Therefore, I want to reiterate my comments that I submitted on November 27 in an email. Please see below.

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: [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: [Renia Ehrenfeucht](#)
To: [City of Albuquerque Planning Department](#)
Subject: proposed IDO changes
Date: Tuesday, December 6, 2022 7:46:17 AM
Attachments: [EPC Dec 2022.pdf](#)

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

Hello!

Please see my attached comments to the proposed IDO changes that are scheduled to be heard on Thursday. I realize that it is too late for them to be included with the staff analysis.

My best, Renia

—
Renia Ehrenfeucht, PhD, MUP
Professor, [Community + Regional Planning](#)
Associate Dean for Research, School of Architecture and Planning
The University of New Mexico
she, her, them, they

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DEPARTMENT OF COMMUNITY & REGIONAL PLANNING

December 6, 2022

RE: Project #: PR-2018-001843; Case #: RZ-2022-00059

Dear Environmental Planning Commission,

I write to express my strongest support for the proposed zoning changes. I am very enthusiastic about the innovative ways the City is working to increase housing availability and affordability for current and new residents. We are in desperate need of housing, and the proposed changes offer real solutions in a reasonable time frame.

Allowing duplexes and ADUs in single family neighborhoods increases housing units while retaining the single family character that many of us in Albuquerque value. In the United States, in 2021, 28% of U.S. households had one person. Another 35% of households had two people. The percentage of one and two person households has been increasing. According to the American Community Survey (2016-2020), Albuquerque housing size at 2.4 people overall is smaller than the national housing size of 2.6 people. Enabling two households to have separate units will not create unmanageable density but instead it reflects the changing living arrangements by creating housing for a range of household sizes.

Duplexes or doubles also make homeownership affordable to more people. My first house was a double, and it made homeownership available to me. New Orleans, where I bought my first house, had significantly higher homeownership rates among Black households with low incomes, in part because doubles were common. This approach can help reduce Albuquerque's homeownership gap. Homeownership disparities are the #1 cause of the racial wealth gap in the United States. Doubles are similar in size and scale to single family houses. In New Orleans, the front doors were the only indication about the number of units and in many cases even this was not obvious from the street. Minneapolis allowed doubles and triples in single family zones in December 2018, and it did not lead to unwanted rapid redevelopment.

Eliminating or reducing minimum parking requirements is another important tool to reduce housing costs and wasted space. We continue to be a car dependent society. Eliminating minimum parking requirements will not eliminate parking but rather adjust the parking to fulfill demand rather than fulfill a regulatory requirement. Similarly building heights will continue to reflect market demand and style preferences. These enable but do not force change.

Enabling easier and less expensive hotel and motel conversions will create naturally occurring low cost housing. These units also could become a long term housing solution for rural New Mexican residents who come to Albuquerque to work or attend college part of the week and live in their home communities part of the week.

The proposed housing solutions make sense! They create more housing, more housing choice, and retain the character of this city we love.

Thank you for discussing this critical issue.

Sincerely,

Renia Ehrenfeucht, PhD, MUP
Professor, Community and Regional Planning
The University of New Mexico

From: [Ron Faich](#)
To: [Lehner, Catalina L.](#)
Subject: R-1 zone change
Date: Sunday, December 4, 2022 1:50:02 AM

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

Ms. Clehner:

I am deeply opposed to the proposed change in the zoning ordinances to allow second residential structures, so-called casitas, within existing R-1 residential lots.

Please send me the Zoom link for the EPC meeting this week where this proposal will be considered. Thank you.
Ron Faich

Sent from my iPad

Comments re: proposed ordinance 0-22-54

Dear Ms. Lehner and Ms. Jones – I wish to convey how shockingly insulting this ordinance is to the citizens of Albuquerque. Mr. Benton and Ms. Jones seem to be very much on the side of developers in co-sponsoring this extremely flawed piece of legislation.

Mr. Benton and Ms. Jones seem to think that putting the term “Whereas” at the front of every statement makes that statement valid and true – it does not!

A few examples:

Page 2, line 28: WHEREAS, the City’s point-in-time count identified over 1300 people experiencing homelessness in 2022.....what has this to do with this ordinance? Do the Councilors really believe that these “additional dwelling units” they want to make as a permissive use are going to be rented out.....to HOMELESS PEOPLE?? If not, what is the point of making this statement as part of this ordinance?

Page 3, line 9: WHEREAS, the history of R-1 zoning includes efforts to exclude people outside the dominant race and lower-income households.... Are they talking about something systematically happening now or something that was happening 60 or 70 years ago? Where is the proof for this? Just because someone can’t afford a particular home doesn’t mean they’re being discriminated against.

Page 3, line 21: WHEREAS, over 5,000 housing units of all types need to be added every year statewide, on average, to accommodate growth expected by 2025, while over the past 10 years, only 3,300 housing units were constructed, on average..... These are STATEWIDE needs, not just City of Albuquerque needs. The Councilors seem to want to put the brunt of statewide housing needs on the backs of Albuquerque citizens. What are other cities doing to alleviate their housing shortages?

Page 4, line 16: WHEREAS, adding an additional dwelling unit for rental or for family members either as an accessory dwelling unit on a lot with an existing house or renovating an existing house into a two-family dwelling can be an anti displacement strategy to help families stay in their homes, support extended families and multigenerational households, and build generational wealth through homeownership for many families who have been marginalized historically..... Who do they think they’re kidding?? If people are allowed to build an “additional dwelling unit” on their property it’s almost a guarantee they’ll be used for rental income, NOT to house grandma so the family can stay together - that wouldn’t bring in any income! And what about any concerns of the next-door neighbors seeing people walk by their side or back fences and walls at all hours of the day and night! Don’t they have any rights here? Not under this proposed ordinance, they don’t. They will lose the enjoyment of their property by losing what little privacy they used to have.

Page 4, line 26: WHEREAS, allowing two-family dwellings (duplexes) and accessory dwelling units in the R-1 zone district would immediately remove exclusionary effects, allow triple the number of dwellings on 68 percent of the

city's zoned properties (38% of the city's total land area)..... Again with the baseless "exclusionary effects" language....and how does allowing duplexes TRIPLE the number of dwellings? I don't follow the math on that at all...

Page 5, line 4: WHEREAS, removing limits on building heights and reducing off-street parking requirements for multi-family dwellings would be an incentive that could lower the construction cost per dwelling unit, help projects be more feasible, and increase the supply of multi-family dwellings.... This would only be an "incentive" for developers! Do the councilors REALLY believe that apartments with very limited resident parking, and on-street parking as the only alternative, will be attractive to anyone? Those apartment complexes will not be able to advertise that they have even the most basic of amenities, which is off-street parking. This new increased supply of multi-family dwellings will be for those people who have the most desperate need for housing, who can't afford anything else. They will become low-income housing and be a magnet for all kinds of issues. That will be a very attractive addition to any neighborhood! Yes, by all means let's have 20-story apartment complexes all over the City and make those residents park along any street they can find....including in front of other peoples' homes.....

Now on to the real issue:

Page 5, line 16: SECTION 1. AMEND THE INTEGRATED DEVELOPMENT ORDINANCE TO ALLOW TWO-FAMILY DWELLINGS PERMISSIVELY IN THE R-1 ZONE DISTRICT CITYWIDE...This is a slap in the face to EVERYONE in the city who has a home on a lot zoned R-1. This is a slap in the face to everyone who has bought a home or built their dream home believing that it will forever remain their home on a SINGLE-FAMILY LOT. The passing of this ordinance absolutely CANNOT HAPPEN! Allowing two-family dwellings permissively would not allow ANY input from neighbors or the neighborhood associations. Do the Councilors really believe that everyone will run out and contract with a builder for construction of a new dwelling on their property? No way! Some might, but the vast majority of these "new dwelling units" will be done by unlicensed friends of a friend, with no permits, no inspections and therefore no safety checks to make sure electrical wiring is done to code and with proper safeguards, plumbing is done correctly, proper foundations have been laid, proper grading and compaction has been done on the lot....the list goes on and on.

The answer to the housing shortage in the City is NOT retroactively changing the fundamental characteristic of a lot zoned for a SINGLE FAMILY dwelling. This ordinance will do NOTHING to alleviate the issue of the homeless population. It will do little, if anything, to relieve the overcrowding in nursing homes and assisted living facilities. The City was gung-ho to bring in companies like Netflix and Facebook for the jobs (and the tax dollars) they would bring, but the City must have figured every employee of those companies would be from Albuquerque and therefore would not need any new housing. No planning was done for many years, and now the costs of that neglect and short-sightedness are being felt. Don't punish the homeowners of Albuquerque for this lack of planning by City leaders!

The fact that many of the comments on this ordinance are in favor is troubling, but the fact that the majority of those favorable comments seem to use the same "boilerplate" language indicates to me that the developers have been busy trying to get everyone and anyone to sign their name to the same rah-rah letter of support to make it seem like the majority of people think it's a great idea. There has been very little publicity on this ordinance – someone(s) is trying to get this pushed through "under the radar"

of the taxpayers. PLEASE DON'T LET THIS HAPPEN! This ordinance is ill considered, will not alleviate any of the stated problems, and takes away FUNDAMENTAL PROPERTY RIGHTS of thousands and thousands of Albuquerque residents – who are taxpayers and constituents!

Sincerely,
Mildred Griffiee
8208 Eagle Rock Ave NE
Albuquerque NM 87122

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: [James Kolberg](#)
To: [City of Albuquerque Planning Department](#)
Subject: Comments on Housing Forward (0-22-54)
Date: Tuesday, December 6, 2022 9:09:33 AM

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

Hi, I would like to voice my support for the Housing Forward portion of the proposed IDO update. I am a homeowner in the SE Heights and think that casitas being allowed is the best possible way to help lower rents and reduce homelessness in the city without much disruption or change to neighborhoods.

thank you,

James Kolberg
1209 Hermosa Dr. SE 87108

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
Mailing address:
PO Box 90608
Albuquerque, NM 87199-0608
Physical address:
8300-D Jefferson NE
Albuquerque NM 87113-1734
Phone - 505.345-5075 Fax - 505.345-5059
E-mail - mdl@sycamore-associates.com



Virus-free. www.avast.com

December 5, 2022

Environmental Planning Commission Members
City of Albuquerque

RE: Agenda Item 1 - Project # 2018-001843
RZ-2022-00059 – Text Amendments to Integrated Development Ordinance (IDO)-Citywide

As a proponent for our aging population in Albuquerque, this letter is in support of proposed amendments to the Integrated Development Ordinance (IDO) regarding the Housing Forward Initiative and respectfully petition endorsement from commission members.

Consideration for approval in this matter is crucial to meet the needs of the rapidly increasing older adult population as the percentage of older adults in our communities is increasing at a higher rate compared to that of younger age groups. It is projected by 2030, New Mexico will have the third largest percentage of the population that is 65+ years old in the nation (26.5%) and furthermore, older adults in Bernalillo County will make up over 40% of the County's population by 2030.¹ Employing strategies to improve the accessibility of the housing stock, specifically by allowing two family dwellings and accessory dwelling units, are age friendly solutions to help our City's older adults meet their needs and age in place and outside of an institutional setting.

Owning a home during retirement on a fixed income can be financially overwhelming. Allowing two family dwellings permissively in the R-1 Zone District citywide, would provide older adults with the option to convert their single-family homes into two family unit homes to generate income and minimize disruption to senior living arrangements and potentially create a safe network of community care services (e.g., family and neighbor support) in a neighborhood they already have established relationships. Multifamily and accessory dwelling units provide a cost-effective alternative to senior living facilities for aging populations to consider.

Supporting the proposed amendments will ensure that the Housing Forward initiative works to address the housing crisis while leveling out inequalities and improve the quality of life for everyone in Albuquerque.

We appreciate your consideration and support in this effort that aims to aid older adults in our community achieve more meaningful and fulfilling lives.

Sincerely,

Age-Friendly Action Committee
Department of Senior Affairs
City of Albuquerque

¹ Human Services Department of New Mexico, 2021

From: [Bolen, Rebecca A.](#)
To: [Vos, Michael J.](#)
Cc: [Renz-Whitmore, Mikaela J.](#); [Lehner, Catalina L.](#)
Subject: LR Comments on O-22-54
Date: Monday, December 5, 2022 1:54:04 PM

Good afternoon,

I apologize for missing the deadline for comments for this Thursday's hearing. If there's still time to attach comments to the staff report, here is a brief summary of input related to ADUs that we've received through the Near Heights CPA assessment outreach process.

In the Near Heights, outreach specific to ADUs was completed this past summer. More than 100 community members submitted feedback on this topic, with around 80 people completing the in-person mapping activity, and 47 people completing the online survey. Of the people who engaged with the in-person activity, about 65% indicated that they supported ADUs as a permissive use, with 25% saying they supported ADUs as a conditional use. Only four people said that they do not think ADUs should be allowed with kitchens. The results of the online survey were nearly identical, with 66% of respondents saying that they would very much support ADUs in their area if they were allowed permissively. Seventy-nine percent (79%) of the respondents to the online survey said that they think ADUs should be allowed citywide in any zone district.

Thanks,

Rebecca



REBECCA BOLEN

she | her | hers

principal planner

o 505.924.3843

m 505.362.1372

e rbolen@cabq.gov

cabq.gov/planning

From: [Tim Nisly](#)
To: [City of Albuquerque Planning Department](#)
Subject: IDO annual update
Date: Monday, December 5, 2022 10:18:08 AM

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

Good morning.

Re: Upcoming IDO Changes
To Chair MacEachen

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 Barelás 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.

Tim Nisly
101 Property, LLC
(O) 505.600.7175
(C) 505.750.8466

www.101prop.com

Full-Service Investment-Grade Realtor

Want to connect? Schedule a time at tnisly.youcanbook.me

From: [Kelly O'Donnell](#)
To: [City of Albuquerque Planning Department](#)
Subject: 2021 IDO Annual Update
Date: Friday, December 2, 2022 6:47:28 PM
Attachments: [image001.png](#)
[EPC 02Dec22.docx](#)

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

Greetings! Please see the attached letter to the EPC in support of proposed zoning changes.
Thank you, Kelly



www.homewise.org



Kelly O'Donnell

Homewisdom Director

phone: 505.955-7014 x714

Email: KODonnell@homewise.org

Remote Office



December 3, 2022

Dear Chair MacEachen and Members of the Environmental Planning Commission:

Albuquerque's shortage of affordable housing undermines quality of life and economic growth. Local land use restrictions, particularly those that limit housing density, impede efforts to develop the additional housing Albuquerque so desperately needs. Homewise therefore supports the City's efforts to increase permissible densities and incentivize the development of affordable housing through proposed changes to the Integrated Development Ordinance (IDO) and adoption of Ordinance 22-54.

Single family residential zoning is widely recognized as a major contributor both to the housing shortage and residential segregation. Broadening the R1 designation to include duplexes is a modest, but important step toward increasing the supply of housing and better integrating our communities. Similarly, increased opportunities to develop ADUs in R1 districts, though hardly a solution to the housing crisis, will add to and diversify the housing stock. Reducing off-street parking requirements for certain affordable and/or multi-family developments will reduce one barrier to development while also supporting efforts to increase public transit ridership.

The mission of Homewise is to help create successful homeowners and strengthen neighborhoods so that individuals and families can improve their long-term financial wellbeing and quality of life. We have been helping New Mexicans achieve their homeownership goals since 1986 and opened our Albuquerque office in 2014. Although we specialize in homeownership, we know that Albuquerque's housing problem is complex, and the solution is multi-faceted. We applaud the proposed zoning changes and look forward to supporting the City's ongoing efforts to ensure that all residents have access to high quality housing that they can afford.

Sincerely,

Kelly O'Donnell, PhD
Chief Research and Policy Officer
Homewise

From: [Goldialu Stone](#)
To: [Jones, Megan D.](#)
Subject: Proposed Ordinance 0-22-54
Date: Monday, December 5, 2022 8:48:47 PM

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

I was shocked to read the proposed Ordinance 0-22-54.

Rather than the City reviewing and revising how their policies, procedures and staffing affect the planning, purchase and completion of new housing, they are proposing to reduce the value of completed Albuquerque housing by allowing major changes in the IDO policies which will in turn create an even greater inconsistency in housing property value than there is now and I suspect will make our housing situation less desirable for more new companies to set-up businesses here.

The city and state spent a great deal of money and salaried dollars to get these large companies such as Amazon, Netflix, Facebook and Intel to move here and/or expand and now they're whining about the Cities worsening housing shortage. Why should the residents of Albuquerque who have worked, saved their money and purchased a home which is probable going to be the largest investment of their life, have it reduced in property value because the city father's ignored or didn't pay attention to the fact that the many new workers that were being brought to the city and state were going to need places to live. It is quite apparent that the city and state didn't plan ahead for the housing aspect of this large influx of people.

Under the Cost Analysis number 4. It states that "There is no cost to the City associated with this legislation." It doesn't mention the cost will be to the home owners which I'm wondering how they would even begin to calculate the cost of reduced home value by the courses of action that a few neighbors will take in many neighborhoods.

Under number 6 of the Cost Analysis questions, It states that "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." It is clear from the above statement, the city has no intention of reviewing their Planning Department policies and procedures, adding more staff to increase the speed of approvals by the city and looking at ways of possibly offering the builders incentives to build affordable housing.

Please do not pass this proposed Ordinance.

Goldialu Stone
7116 Quail Springs PL NE
Albuquerque, NM 87113

From: [Dan Regan](#)
To: [Lehner, Catalina L.](#); [Jones, Megan D.](#); [Ortega, Crystal L.](#)
Cc: dlreganabq@gmail.com
Subject: Comments Submitted To EPC & City Council RE: O-22-54
Date: Monday, December 5, 2022 2:02:33 PM
Importance: High

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

Ms. Lehner and **Ms. Jones**, please include this email in the packets for the EPC prior to their meeting on 12/8/22.

Ms. Ortega, please distribute this email to all City Councilors.

Thank all of you for your help with this matter. Dan Regan

TO All EPC Members and to all CABQ City Councilors:

O-22-54 is not ready for serious consideration by the EPC or the City Council for, at least, all of the following reasons:

- The IDO in its own language states that its purpose is to IMPLEMENT the city's Comprehensive Plan. That Comprehensive Plan spends substantive language and ink talking about the City's need to "enhance, protect, and preserve neighborhoods". The Planning Dept. used 13 mentions of this language of the Comp. Plan to justify the 2000 or so Voluntary Conversions in the first year of the IDO's existence. It is **impossible** for the City to accomplish this promise of the Comp. Plan when it wants to radically alter the rights of every R-1 owner by changing zoning parameters from a single family home status to multiple dwellings on any R-1 lot and to do so with a process that will be largely outside the awareness of the majority of CABQ. homeowners!
- The Comp Plan spends an entire chapter dealing with ABQ's "unique geography" and the ability of its residents to maintain sight lines to the environmental beauty that is our blessing to have. NOTHING in O-22-54 addresses these goals of the Comp. Plan. Instead we get the amendment to REMOVE HEIGHT MAXIMUMS from apartment/townhouse developments. WHERE IS THE BALANCE AND ACKNOWLEDGEMENT THAT THE COMP. PLAN EVEN EXISTS????
- One of the ways I have stated the impact of O-22-54 to my Neighborhood Association & Coalition members is:
 - "THE LARGEST INVESTMENT IN YOUR LIFE, MADE WITH THE BEST CONSIDERATIONS POSSIBLE AT THE TIME, TO LIVE AS YOU MOST WANT TO LIVE, IS NOW AT RISK OF ANY PROPERTIES NEAR YOU DOUBLING THE BUILDINGS & OCCUPANTS ON THEIR PROPERTY AND ANY OF CAN BE PUT UP FOR RENTAL PURPOSES, EVEN AirBnb USES!"
- To this taxpayer's understanding, O-22-54 is a complete sell-out by CABQ of the financial, legal and social contract that was made when residential property owners over the last 40 or more years purchased their R-1 properties &/or their homes. **This should not be able to be done mostly out of sight of the public and in a hasty manner!**
- The 11/21/22 letter from the Inter-Coalition Council (which I support & participated in) contains many issues that the City would rather not deal with at this moment, but in its haste to pass O-22-54, these issues may be left to rot, to the detriment of the whole city.
- O-22-54 notes in its WHEREASes, the low income, the homeless and the historically discriminated against (for housing)and this is appropriate. However, NOTHING in O-22-54 addresses how these three groups could even be assisted by all of the "accessory dwellings".....there is NO FUNDING in O-22-54 to facilitate any of these 3 groups in obtaining even minimalistic housing. As another resident has noted: newly constructed "accessory dwellings" at today's costs would be well beyond the reach of low income and homeless folks.
- CABQ has NOT seriously pursued adequate affordable housing development for more than a decade. I have not been able to get public figures on numbers of affordable housing units built in the last 7 years after a month of requests to city departments.
 - As attested to in City Council several months ago, CABQ may have to SEND BACK to the federal government \$1.2+ million dollars because a NIMBY stance on the West Side has kept

- o a planned Affordable Housing project from occurring.
 - o In a seven block area near San Pedro & Alameda, close to 780 apartments were approved & built in the last 7 years.....ALL of them in GATED COMMUNITIES and NONE of them with Affordable Housing units.
 - o As one respondent has questioned: **why can't CABQ require all multi-family / apartment developers to create 15% of their built units to be Affordable Housing.** Surely these builders can figure out how to do that.....they are smart people. As one of them explained, their \$60 million, 282 apartment gated community (inside an arroyo, no less) would never "really" be paid off by them.....they would simply keep getting federal housing loans until they got their money back and then they would sell the complex. Sounded like some form of public funding to me.
- What research has been done so that anyone involved in O-22-54's creation and passage KNOWS and WILL SHARE the number of single family residences that have been purchased by (or in the name of) out of state / national investment corporations? In case you are not aware, major national investment houses have been buying up homes across the nation to use for **their** purposes, not the needs of the cities and towns!! And at least some of you should be aware of what these investment houses have done in the purchase, fiscal raping and diminishment or closing of many regional hospitals! Housing ain't that different. **And if nobody knows this information or is willing to share it, then what is CABQ risking for its very own taxpayers??????**
- The City of Santa Fe, in June 2019 passed a similar zoning change in hopes of helping the low income, unhoused and those searching for housing obtain decent shelter. Over the past year or more, Santa Fe has stepped back from this effort because rather than reducing their own housing-challenged populations, the City of Santa Fe found that almost all "accessory buildings" were being used for AirBnb type uses. Can CABQ learn from our neighbors not that far to the north?

A brief Conclusion:

- O-22-54 is attempting to address some real problems. BUT, the speed with which it is using, the lack of real engagement with the city's residential taxpayers, and the attempts to sidestep the historical causes for these real problems will not be helpful in creating real solutions to these real problems.
- The fact that almost every "real estate investor" who has commented on EPC consideration of O-22-54 using a 'form letter' repetition of O-22-54 being "good for the city and the state" gives this taxpayer **SERIOUS PAUSE**. We (property owners & taxpayers) have had rights to know & participate in decisions taken away from us before and **this feels like a repeat performance by CABQ**.
- I STRONGLY recommend that the EPC move O-22-54 back to the City Council with a "delayed until further study and meaningful consultation with CABQ residents & their representative bodies" recommendation. There is simply too much at stake in moving forward without more input from the folks who help pay for this city to operate.
- If "Accessible Dwellings" were initially limited to families providing for extended family members, such an effort might be effective and palatable to CABQ residential owners. From this modest start, a more carefully constructed expansion plan could be crafted that would meet the real housing needs of CABQ.

Respectfully submitted by

Daniel Regan

Daniel Regan
 4109 Chama St. NE 87109
 Knapp Heights NA, President
 District 4 Coalition, Zoning / Development Committee, Representative.

Allowing Accessory Dwelling Units (ADU's) Will Do More Harm Than Good

Summary ADU's will not provide significant benefit of adding affordable housing, however, they will lower the quality of life of all the other houses in neighborhoods where ADUs are added, especially in many older neighborhoods. This is especially true of many older neighborhoods, which already have high density and insufficient parking. Therefore, the proposed zoning changes should either be rejected or scaled back from the "one size fits all" to recognize that some older R1 neighborhoods already have very high population densities of people and vehicles and that allowing ADU's would negatively impact the neighbor's privacy and quality of life.

Issue 1 ADU's will not be effective addressing the issue of creating affordable housing, although the addition of ADU's will increase the number of units available for rent. The trend nationwide, however, is toward short-term rentals rather than full time rentals. The average cost of a small to medium size 1-bedroom ADU is about \$95,000, including the cost to prepare the site, obtain permits, build the unit, add sewer lines, water lines, electrical, natural gas lines, and internet/cable. There is also additional home insurance, which typically must be a separate policy for a detached structure, about \$100-\$150/month, and increases in property taxes, about \$100/month. So, a 15-year mortgage, including homeowners' insurance and property tax for an ADU costs about \$1,250/month. The average rental cost in Albuquerque for a 1-bedroom apartment is about \$1,100/month. Therefore, the cost of building an ADU properly to code does not appear to enable ADU's to be effective in creating affordable rentals. The city and neighbors will also have to deal with those homeowners who do not follow the city codes and obtain insurance etc., and which can result in pitting neighbor against neighbor, which can lead to dangerous situations and reduced enjoyment of life in our neighborhood.

Issue 2 ADUs will lower the quality of life of many of the other houses in neighborhoods where ADUs are added, especially in older neighborhoods. A "one size fits all" zoning changes for R1 zoned neighborhoods does not take into account the issues already being faced by many older neighborhoods. In our neighborhood, (between Moon and Wyoming and Menaul and Indian School) the homes were built in the mid 1950's. These houses were built as one-story houses and the structure uses a greater proportion of the lot than multiple story houses in newer neighborhoods. Also, there is not much extra space in the backyards on most of the houses and that would result in an ADU being very close to the backyard property line, and reducing privacy and increasing noise for the neighbors. In addition, these homes were not designed for the greatly increased number of cars and other vehicles that people have now. Many front and side lawns have been turned into ad hoc parking lots, because of insufficient parking space. It is challenging for the city to enforce existing ordinances, let alone new ones relating to ADUs. The existing houses are often very close to property lines, and adding an SDU would reduce privacy and increase noise for existing neighbors.

Our neighborhood has four very large apartment complexes in a continuous area. From Lester to Moon along Northeastern Blvd, there are the Executive West, apartment complex, the Three Fountains Apartments, La Vida Buena, and Arlo Apartments, which have thousands of residents. On the Southside of Northeastern, we have multiple 4 plex apartments, and a large apartment complex on the side of Northeastern at Moon. We also have the Wyoming Mall which includes Wal-Mart. This high density results in much parking in the streets, and a larger than average number of people driving and walking, resulting in increased traffic and safety issues for drivers, pedestrians (especially the elderly of which there are many) and children who play outside.

In Conclusion ADU's will not be effective in helping create affordable housing. We suggest the city look at alternate methods that will be more effective in addressing this issue. The addition of ADU's in many older already high-density neighborhoods would be a significant detriment to the quality of life to many residents. We therefore recommend that the city not allow changes to the R1 zoning to allow ADU's.

Thank you for your consideration,

Barry and Marcia Schwartz, 40 plus year residents in our neighborhood

December 5, 2022

From: [Goldialu Stone](#)
To: [Lehner, Catalina L.](#)
Subject: Proposed Ordinance 0-22-54
Date: Monday, December 5, 2022 8:48:06 PM

[EXTERNAL] Forward to phishing@cabq.gov and delete if an email causes any concern.
I was shocked to read the proposed Ordinance 0-22-54.

Rather than the City reviewing and revising how their policies, procedures and staffing affect the planning, purchase and completion of new housing, they are proposing to reduce the value of completed Albuquerque housing by allowing major changes in the IDO policies which will in turn create an even greater inconsistency in housing property value than there is now and I suspect will make our housing situation less desirable for more new companies to set-up businesses here.

The city and state spent a great deal of money and salaried dollars to get these large companies such as Amazon, Netflix, Facebook and Intel to move here and/or expand and now they're whining about the Cities worsening housing shortage. Why should the residents of Albuquerque who have worked, saved their money and purchased a home which is probable going to be the largest investment of their life, have it reduced in property value because the city father's ignored or didn't pay attention to the fact that the many new workers that were being brought to the city and state were going to need places to live. It is quite apparent that the city and state didn't plan ahead for the housing aspect of this large influx of people.

Under the Cost Analysis number 4. It states that "There is no cost to the City associated with this legislation." It doesn't mention the cost will be to the home owners which I'm wondering how they would even begin to calculate the cost of reduced home value by the courses of action that a few neighbors will take in many neighborhoods.

Under number 6 of the Cost Analysis questions, It states that "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." It is clear from the above statement, the city has no intention of reviewing their Planning Department policies and procedures, adding more staff to increase the speed of approvals by the city and looking at ways of possibly offering the builders incentives to build affordable housing.

Please do not pass this proposed Ordinance.

Goldialu Stone
7116 Quail Springs PL NE
Albuquerque, NM 87113

From: [Geneva Trujillo](#)
To: [Lehner, Catalina L.](#)
Subject: R-1 proposal
Date: Tuesday, December 6, 2022 9:11:27 AM

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

Right now as a homeowner in Albuquerque and having lived here for 58 years, I see a decline in the nice neighborhoods that we once enjoyed.

One home on a parcel of land and some homeowners prefer not to take care of their property plus saving their old cars and not getting rid of them....what will happen when they can add a second dwelling to their property and they have no place to park the one or two extra cars.

Right now in our neighborhood, we have people that have two to three cars per dwelling. It is always nice to have a casita but at what cost to the looks of the neighborhood and the aesthetics....

Number of extra people, extra cars, congestion where original plans were to accommodate a family.

Think it thru on what impact it will have on the entire neighborhood.

Geneva Trujillo

From: [Geneva Trujillo](#)
To: [Lehner, Catalina L.](#)
Subject: Re: R-1 housing
Date: Monday, December 5, 2022 1:16:05 PM

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

This is in regard to R-1 proposal adding an extra dwelling to the backyard.
Thank you!!!

On Mon, Dec 5, 2022 at 1:10 PM Lehner, Catalina L. <CLEhner@cabq.gov> wrote:

Hello, Geneva.

I figure these comments are in response to the housing forward/bill O-54 case to be heard by the Environmental Planning Commission on 12/8.

Is that correct? If so, I will add them to the record for this case. Here is a link to more information:

<https://www.cabq.gov/planning/boards-commissions/environmental-planning-commission/epc-agendas-reports-minutes>

Thank you.



CATALINA LEHNER, AICP

principal planner

wireless administrator

she | her | hers

o 505.924.3935

e clehner@cabq.gov

cabq.gov/planning

From: Geneva Trujillo <genlee6@gmail.com>
Sent: Monday, December 5, 2022 1:07 PM
To: Lehner, Catalina L. <CLEhner@cabq.gov>

Subject: R-1 housing

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

Most certainly!!! They have not thought it all the way thru...

1. What will they do with the tenants cars
2. What will they do with the tenants guests cars
3. If the tenant has a trailer, will they also park that
4. Noise level when tenant has parties or get together.
5. Homes in most of the neighborhoods were developed to accommodate 1 home per parcel
6. Value of homes will go down due to the type of housing going up
7. Neighborhoods will deteriorate due to congestion of cars and dwellings
8. To accommodate these people let us build apartments in all the empty spaces now available in Albuquerque and I will gladly help you find these areas...they are plentiful.

Geneva Trujillo

505-881-1959

(Resident of Albuquerque since 1964 and also former business owner and had rentals)

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,

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