

48-hour Comments Received after
11/11/25 and by 9 am on 11/18/25

First Name	Last Name	Interested Party	Comment	Attached PDF	Do you wish to submit an image?
Rene'	Horvath	Neighborhood Association Repres	I am submitting a PDF Document for the November 20th, 2025 EPC hearing. See below	Nov 20th 2025 Hearing Comments on IDO Amendments.pdf	No
Rene'	Horvath	Neighborhood Association Repres	I am submitting a PDF below for the Nov. 20, 2025 EPC hearing regarding the 2025 IDO Bi-Annual Update.	Comments for EPC Nov 20th 2025 regarding Zoning conversions.pdf	No
Richard	Schaefer	Neighborhood Association Repres	<p>This 151-amendments should be rejected. "Upzoning" residential properties is not supported by reliable population or economic data.</p> <p>The EPC and City Council should not be prioritizing the interests of real estate speculators and libertarian pressure groups over those of the existing residents of Albuquerque.</p>	N/A	No
Bryan	Dombrowski	Resident	attached	IDO EPC Comment.pdf	No
Sarah	Mock	Local business owner	Full comment attached	IDO EPC Comment-1.pdf	No
Jane	Baechle	Resident	<p>I have reviewed the Staff Report and appended public comments published on Thursday, 11/13/2025.</p> <p>Please find my written comments submitted under the 45 hour rule.</p> <p>Thank you.</p>	EPC 48hr IDO.pdf	No
Patricia	Willson	Resident	<p>Please see attached 48-hour comment letter.</p> <p>Thank you.</p>	2025 11 17 LTR to EPC48hr.pdf	No
Rene'	Horvath	Neighborhood Association Repres	<p>Dear EPC Chair Aragon, and fellow Commissioners,</p> <p>I submitted 2 letters containing my comments on the IDO amendments on November 11th for the Nov. 20th staff report, but I was not able to find either of them in the report! Therefore, I am resending these 2 letters to insure they will be included in the Record - and EPC packet for the Nov. 20th, 2025 hearing.</p>	Nov 20th 2025 EPC Hearing Comments on IDO Amendments.pdf	No

Rene'	Horvath	Neighborhood Association Repres	I submitted 2 letters containing my comments on the IDO amendments on November 11th for the Nov. 20th staff report, but I was not able to find either of them in the report! Therefore, I am resending these 2 letters to insure they will be included in the EPC packet for the Nov. 20th hearing. Please see PDF Letter below with comments regarding an IDO amendment.	Comments for EPC Nov 20th 2025 regarding Zoning conversions.pdf	No
Rene'	Horvath	Neighborhood Association Repres	I am sending in comments related to the IDO amendment C-1 infrastructure Improvements, with a concern of postponing Underground Drainage infrastructure to do at a later date. Construction of Drainage improvements is too important to be postponed.	Nov. 17 2025 Comment on Drainage Improvements.pdf	No
Steven	Holman	Resident	Please see the attached letter and petition signers	EPC Letter.pdf	No
Patricia	Willson	Resident	Please see my final 48-hour comment letter, attached.	2025 11 18 LTR to EPC48hr2.pdf	No
Jane	Baechle	Resident	NM Stat § 7-36-21.2 (2024) A(3)(b) Exception to limitation on increase property tax rate to 3% "(b) the use or zoning of the property has changed in the year prior to the tax year." Effect of "Legislative Zoning Conversions" #ZC-3 and #ZC-4.	N/A	No
Mike	Voorhees	Resident	Please forward my PDF to the EPC under the 48 hour rules.	EPC IDO 11-18-25.pdf	No
Milburn	Pennybags	Local business owner	Please submit the attached file to the commissioners on my behalf.	MQP3.pdf	
Jaemes	Shanley	Neighborhood Association Repres	attached letter submitted ahead of Nov 20 hearing	IDO Amendments Letter 48 hour ahead of Nov 20.pdf	No

November 11, 2025

Dear EPC Chair Aragon, and fellow Commissioners,

The IDO update started with 99 amendments which was already too many amendments to review. It took weeks to review and research in order to pin comments onto the spread sheet. Then the first spread was replaced with a second spread sheet which had 150 amendments. I did not see the first spread sheet with our comments in the October 28th staff report. Therefore I am submitting some of the comments I pinned for the first spread sheet with one I was able to get onto the second sheet.

1) #7: Historic Protection Overlay zone: POSTED Comment August 27, 2025: Albuquerque is fortunate to have so many unique neighborhoods which have a wide range of architectural styles and history, which includes Pueblo, Territorial, Victorian, etc. This is what makes Albuquerque such a fun and interesting place to live. It is my understanding that this would be a tool that a community could use to help maintain their historic architectural character, which I support.

2) #12 & 13: Carwashes - Change from Permissive to Conditional in MXL & MXH : POSTED Comment August 25th: A conditional use is better since the number of carwashes has increased significantly in recent years, and many conflicts have resulted where carwashes, especially large car washes, were built too close to residents. This amendment will help resolve that. There should also be a minimum distance requirement of 250 ft. between large car washes and residential areas, to reduce nuisance noise and fumes.

3) #18 IDO pg. 157: Cottage development: Minimum size of lot is 10,000 sf. Replace UC-MS-PT to allow small scale, infill, missing middle housing options, on large lots throughout the City.

POSTED Comment August 27, 2025: Maintain the existing IDO language and do not approve this amendment. **Note:** Currently cottage developments are located on a minimum 1 acre lot. Reducing the lot size to 10,000 sf citywide is too small to do Cottage/multiple dwellings. A 10,000 sf. lot is the standard size for 1 single family home, maybe two at the most. How many cottage units would a 10,000 sf.lot hold? What about the common open space and the Parking? The IDO was changed to allow cottage development on 10,000sf lots within a quarter mile of UC-MS-PT. It's unclear how well this is working along these corridors. Therefore, we want to maintain current IDO language and don't reduce the lot size 10,000sf citywide. We want cottage development to turn out nice.

4) #19 IDO pg.160: Duplexes: Allows Duplexes in R-A, R-1, on corner lots that are at least 5000sf.

POSTED Comment August 27, 2025: A 5000 sq.ft. lot is too small for a duplex, especially on the corner. The typical size lot for one single family home is 10,000sf. What about the parking? Putting 2 homes on a 5000 sf. lot would be problematic, especially on a corner lot, especially where on-site parking is necessary for vehicles to enter and exit to avoid problems entering the neighborhood. Agree with other posted comments that duplexes would need to be in scale and character with the surrounding neighborhood. This amendment should not move forward.

5) #20. IDO pg 161. Dwelling Live-work: prohibits cannabis & nicotine sales as Live-work:

POSTED August 25th, 2025: Agree, cannabis and nicotine should be prohibited, just like liquor retail, within a live work residential building and lot. **Support!**

6) 26. IDO pg. 190: Nicotine Retail: This use is prohibited on a lot within 1000 ft. of another primary nicotine use. **POSTED August 27, 2025:** **Support!** This will help avoid over saturation of the market.

7) #29. IDO pg. 212: ADU - Dwelling unit/ height: The maximum height of an ADU shall be 18 ft. or as tall as the primary structure on the property, whichever is greater. **An ADU constructed over a detached garage is limited to the height of the zone district.**

POSTED Comment August 27, 2025: **Don't support!** Maintain current language that the height of a casita is no higher than the primary house. If the applicant wants to go higher, they could request a variance or waiver and address any concerns from adjacent neighbors.

8) #32.IDO pg. 227: Maximum height for R-ML and R-MH: **Add building height maximums for AC - Activity Center & MT - Major Transit,** and bump up with UC-MS-PT with a height bonus for structured parking:

POSTED Comment August 27, 2025: **Don't support adding AC & MT** to the list with UC-MS-PT in order to increase density and building heights. The IDO has already increased the building heights in Albuquerque, from our previous zone code, raising the building heights to 38 ft. for R-ML and 48 ft. for R-MH, which can be bumped up to 65 ft. in UC-MS-PT. This has created a lot of anger and conflicts within our community. There is no need to increase the building heights any further. **Don't support!**

9) #33. IDO pg.232: Maximum building height in Mixed use zones: **Add building height in AC-MT to Allow higher densities in Activity Centers and Major Transit corridors. Bump up UC-MS-PT. Add AC to workforce housing bonus and structured parking bonus. Adds building heights to Urban Centers, Main streets, Premium Transit to establish a tiered allowance for building heights in different centers and corridors.**

POSTED Comment August 27, 2025: As mentioned above, the IDO has already up-zoned the zoning to do taller buildings. There is no need to increase the height any further. **Do not add AC and MT to do more density and increase building height**, even for workforce housing bonus or structured parking. Workforce housing should be a requirement not an incentive to allow taller buildings. Things need to be more in scale and character, with the surrounding area. **Don't support!**

10) #36: IDO pg. 274: **Reduce Minimum Parking Requirements for multi-family:** To reduce housing costs per unit. See new requirements below. See existing requirements crossed out.

1 space / DU for 2 or fewer BDR.	1 space/studio	1.8 space/DU with 3 or more BDR
1.5 space / DU for 3 or more BDR.	1.2 space/DU for 1 BDR	UC-MS-PT 1 space/DU
1 space/ DU for Workforce housing	1.5 space/ DU with 2 BDR	

POSTED Comment August 27, 2025: **This is a big mistake!!!** There is no evidence this will reduce housing costs. The parking requirements have already been reduced in previous IDO amendments.

Apartment managers and their tenants are already dealing with a shortage of parking spaces for the tenants and their guests, leading to a lot of conflicts that the manager and the tenants have to deal with. This ruins the quality of life for the people living there. The Transit in Albuquerque is very limited and should not be expected to compensate for the lack of apartment parking spaces. People need their cars to get around town for work, shopping, picking up their children at school or sports and doctor appointments, errands, etc. Reduced parking will force tenant parking in the adjacent neighborhoods or in nearby shopping centers, which will also create conflicts. It is not wise to build apartments if there is not enough parking for the tenants, or their guests.

11) #40. IDO multiple pgs: to establish Parking Maximums to these corridors: UC-AC-MS-MT-PT: to eliminate parking requirements as a cost barrier to housing and other development.

POSTED Comment August 27, 2025: Don't Support! Parking maximums will make things even worse.

To remove parking minimums and then place parking maximums is not a good idea. There is no evidence that this will reduce housing costs. While we would like people to ride the bus, the level of transit service is lacking and does not cover the whole city. Rents will still be high, and our quality of life will deteriorate. Placing parking maximums will be a disaster. **This amendment should not move forward!!!**

12) #44: Neighborhood Edge step down protection: Currently building heights are allowed to be 30 ft. within 100 ft. of R-1 property, in UC, MS, PT, Beyond 100 ft. the building height can go higher. Amendment wants to add: MT Major Transit, and reduce NA Edge distance from 100 ft. to 50 ft.

POSTED Comment Aug.22, 2025: The Neighborhood Edge distance requirement should not be reduced. The Neighborhood Edge allows 30 ft. high buildings within 100 ft. distance from a single family residence. After 100 ft. a building can go a lot higher above 30 ft. high. The 100 ft. Neighborhood edge is already not enough distance. To reduce the 100 ft. distance to 50 ft. is even worse, and will reduce protection for the neighborhoods, causing numerous conflicts in the Community. Don't support reducing. Maintain 100 ft. distance.

13) #45. Multi family facades: POSTED August 27, 2025: Recommend Leaving "side" in there. So it reads: "Each front and street facing and side facade shall meet all of the following requirements..."

14) #49 Pre-submittal Tribal meeting: POSTED August 28, 2025: Tribal Engagement needs to be more effective, especially for the sake of the mesa top, the petroglyphs and volcanoes, and protecting the view shed in this area. We need to develop this area more sensitively and respectfully to honor this unique natural and cultural landscape.

15) #50. Bulk Land subdivision: Remove Tribal meeting requirement:

POSTED August 28, 2025: As mentioned above, Tribal Engagement needs to be more meaningful and effective in protecting our natural cultural resources. Engagement should not be just checking the box, without adequately addressing issues and concerns.

16. #54: Appeal Standing: A majority of property owners or tenants within 660 ft. of subject site.

POSTED Comment August 28, 2025: Appeal standing is important and should be for any individual or neighborhood which have issues or concerns that still need to be addressed. Unfortunately, it seems the only way to get issues addressed, is through Appeals. If the goal of the amendment is to place restrictions on Appeal standing for an individual or Neighborhood Association then it should not be approved.

17. #72: Changing the definition of Abut to not include corner lots.

POSTED Comment August 28, 2025: I strongly disagree with changing the definition of the word "Abut" so that it does not include a diagonal corner lot, even when it touches a project site. The benefit of maintaining the definition for the words "abut", and also "adjacent" to include diagonal lots helps in protecting our sensitive lands and neighborhoods better. Development needs to be more sensitive to blend with the built and natural environment and be in scale and character with the surrounding area, including abutting and adjacent lots. It is unfortunate the City is continually working to undermine zoning protections which prevents us from achieving attractive developments, which complement the surrounding area. It's important to maintain a strong definition, rather than weaken it. This amendment should not move forward!

18) #92: R-1 Dimensional Standards: Removes larger minimum lot sizes and setbacks that raise the cost of housing and exclude lower income households. **POSTED Comment August 28, 2025:** The purpose of Dimensional standards are to set lot sizes and setback requirements to maintain privacy, quality of life and to provide fire protection. This proposal, if implemented, could set the stage for devastating fire storms in closely packed neighborhoods. The dimensional standards as written should NOT move forward.

19) #C-1 & C-2: Zoning Map conversions: to change R-1 single family to multi-family.

C-1) Zoning Map: Convert RA/R-1/R-T to RML apartments- Matches the zone map in IDO made by 0-24-69 within 1/4 mile of MS & PT corridors, north of Central and east of the River.

C-2) Zoning Map: Convert RA/R-1 to R-T townhouses- Matches the zone map in IDO made by 0-24-69 within 1/4 mile of MS & PT corridors, south of Central and west of the River.

Posted Comment August 28, 2025: Agree, these zoning conversions are major zone changes that were done during the holidays, without notification, especially to those who will feel the impact of the increased density and building heights, along these corridors. Because of the sneaky way this was handled it is now in litigation and should not move forward.

20) #C-3 to C-4: I am Concerned about these zoning conversions.

C-3) Zoning Map: Convert R-A/R-1/R-T to RML in MT areas: Similar to 0-24-69, this conversion allows full range of housing options from single family to apartments within Major Transit corridors.

C-4) Zoning Map: Convert R-A/R-1/R-T to RML in AC areas: Similar to 0-24-69, this conversion allows full range of housing options from single family to apartments within Activity Centers. **Note: This will affect Coors Blvd. and Golf Course Rd.** **POSTED Comment August 28, 2025:** The C-3 and C-4 amendments: These zoning conversions are major zone changes that are being done to increase density and building heights along Major Transit Corridor and Activity Centers by changing R-1 to multifamily. The IDO already changed zoning in 2018, to allow zoning categories that allow multifamily. There is no

need to do more. There was no prior notification of this amendment to convert R-1, R-A or R-T to RML. This lack of notification is underhanded. 0-24-69 is under litigation and these amendments are premature and should not be approved.

New Amendment (added to the 150 amendments): I would like to add my concern for the new City Council amendment regarding underground drainage which Councilor Bassan is proposing.

(C-1) Infrastructure improvement: Councilor Bassan: To allow Property owners of R-1 and R-A lots to develop prior to building underground drainage improvements at their own risk, with an agreement that these lots will be assessed in the future for the cost when the City constructs these improvements. It also allows an exemption for sidewalks, curb and gutters to also be assessed for the cost when the City builds it in the future.

My Comment: This Amendment should not move forward. Underground drainage improvements are extremely important and should not be deferred. Allowing development to proceed without critical drainage infrastructure will cause havoc and litigation. Several Civil engineers have also expressed concerns about this proposal as well.

There are many other Amendments that need more analysis and should not be approved. This IDO amendment process is too complex and overwhelming especially with 150 amendments and does not foster good Planning. Good Planning is about developing good design which will provide protection for surrounding neighborhoods and complement the things the community values. It is important to maintain the natural, historic, and cultural character of Albuquerque as well as the quality of life for its citizens.

Thank You,
Rene' Horvath

November 11, 2025

Dear EPC Chair Aragon, and fellow Commissioners,

In reviewing the new 150 amendments on the EPC web page, I especially want to express my concerns regarding the proposed amendments regarding zoning conversions along Major Transit corridors and Activity Centers. These conversions are significant zone changes which will impact many corridors, including the West side, these proposals will increase the building heights and density. The IDO already increased the building heights from the prior zone code. This has created numerous conflicts due to the buildings being too tall and out of character for the surrounding areas, affecting residents and our sensitive areas. The Westside has the Bosque and the Mesa top with the volcanoes, and the Petroglyphs which have spectacular views that we want to preserve. Coors Blvd. is a view corridor where views are highly valued. The views to and from the Mesa top including the escarpment and volcanoes are equally important to preserve. There has been no public discussion concerning these up-zone proposals which will affect the residents along these corridors. There are also numerous amendments proposing to reduce the parking for multi-family and workforce housing which will make things even worse. **R-1, R-T, R-ML should NOT be up-zoned. See amendment below.**

- Amendments: **#ZC-3 & # ZC-4) Zoning conversion for MT (Major Transit corridors) & AC (Activity Centers) to change (R-1 to RT Town house) (R-T to MX-T multi family)(R-ML to MXL). Should not be approved!**

Staff

Condition
#21 & 22
Approve

ZONING CONVERSION

in Major Transit Corridors and Activity Centers

2025
IDO
Update

CHANGE


Explanation
• R-1 → R-T to allow housing options from single-family though townhouse
• R-T → MX-T to allow housing options from duplex though multi-family
• R-ML → MX-L to allow housing options from townhouse though multi-family

Item #ZC-3
Approved

Item #ZC-4
Approved

R-1 = Residential – Single-family
R-T = Residential – Townhouse
R-ML = Residential – Multi-family Low Density
MX-T = Mixed-use – Transition
MX-L = Mixed-use – Low Intensity

IDO INTERACTIVE MAP



MT = 660 feet from Major Transit Corridor
AC = Activity Center

<https://abq-zone.com/node/1937>

In addition: ZC -3 and ZC-4 are also proposing to increase the building heights.

See Below for the proposed changes to increase the building heights in amendments: ZC-3 and ZC-4

ZONING CONVERSIONS

MT-AC AREAS

2025
IDO
Update

Original Zoning	Current Building Height Maximum - Citywide	Zoning Conversion	Post-conversion Building Height Maximum ¹		
			Current Citywide	Proposed AC-MT ³	Proposed UC-MS-PT ³
R-1	26 feet	R-T	26 feet	N/A	N/A
R-T	26 feet	MX-T ³	30 feet	42 feet	54 feet
R-ML	38 feet ²	MX-L ³	38 feet ²	50 feet	62 feet

- 1 Subject to Neighborhood Edge, limiting heights to 30 feet near low-density residential development [IDO §14-16-5-9(C)].
- 2 Currently eligible for height bonuses for UC-MS-PT areas, workforce housing, and structured parking.
- 3 Item #33 proposes by-right maximums for AC-MT, bumps up by-right maximums for UC-MS-PT accordingly, and adds AC to existing height bonuses for workforce housing and structured parking.

Item #ZC-3
Approved
Item #ZC-4
Approved

AC = Activity Center
MT = Major Transit
UC = Urban Center
MS = Main Street
PT = Premium Transit

There are other IDO amendments: #32, #33, #40, that are also proposing to increase the building height and reduce the parking along Coors Blvd., Golf Course road, and the Mesa top. These amendments should also **NOT** be approved.

MAXIMUM BUILDING HEIGHTS

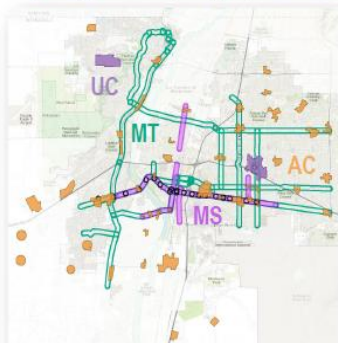
Mixed-Use Zone Districts

Par
5

CHANGE / IDO TEXT

Staff

- Explanation**
- Adds a new tier of higher building height in Activity Centers and Major Transit corridors, where additional density is appropriate.
 - Bumps up building height in Activity Centers, Urban Center, Premium Transit, and Main Street areas accordingly, as the Centers and Corridors where the highest density is appropriate.



AC examples:

- Coors & Montano
- Coors & I-40
- Four Hills Village
- Hoffmantown
- Hiland
- San Mateo & Montgomery

MT examples:

- Coors
- Louisiana
- Lomas
- Menaul
- Montgomery
- San Mateo

Item #33
Approved

Table 5-1-2: Mixed-use Zone District Dimensional Standards				
AC = Activity Center; MS = Main Street area; MT = Major Transit area; PT = Premium Transit area; UC = Urban Center				
BR = bedroom DU = dwelling units				
Note: Any different dimensional standards in Part 14-16-3 (Overlay Zones) and Section 14-16-5-9 (Neighborhood Edges) applicable to the property shall supersede the standards in this table.				
Zone District	MX-L ^{1,2}	MX-L	MX-M	MX-H
Site Standards				
Usable open space, minimum ^{1,2}	Efficiency or 1 BR: 225 sq. ft./unit 2 BR: 285 sq. ft./unit ≥3 BR: 350 sq. ft./unit UC-MS-PT: 50% reduction			
Setbacks^{1,2,3,4}				
Front, minimum	5 ft. UC-MS-PT: 0 ft. ^{2,3}			
Front, maximum	N/A UC-MS-PT: 15 ft.			
Side, minimum	Interior: 0 ft.; Street side of corner lots: 5 ft. UC-MS-PT: 0 ft.			
Side, maximum	N/A UC-MS-PT: Interior: N/A; Street side of corner lots: 15 ft. ^{2,3}			
Rear, minimum	15 ft. UC-MS-PT: 0 ft. where rear lot line abuts a street or alley			
Rear, maximum	N/A			
Building Height^{2,3,4}				
Maximum				
Citywide	30 ft.	38 ft.	48 ft.	68 ft.
AC-MT	42 ft.	50 ft.	60 ft.	80 ft.
UC-MS-PT	54 ft.	62 ft.	72 ft.	92 ft.
No maximum	For multi-family residential dwellings in or within ¼ mile (1,320 ft. of MS-PT) ^{1,2}			
	N/A		For portions of building >100 ft. from all lot lines	
Bonuses				
Workforce Housing	AC-MT: 12 ft. UC-MS-PT: 24 ft. ^{2,3}			
Structured Parking	UC-AC-MS-PT-MT: 12 ft.		UC-AC-MS-PT-MT: 24 ft.	

See Below for Amendment #32: also proposing to increase the building heights for R-ML & R-MH multi-family zones.:

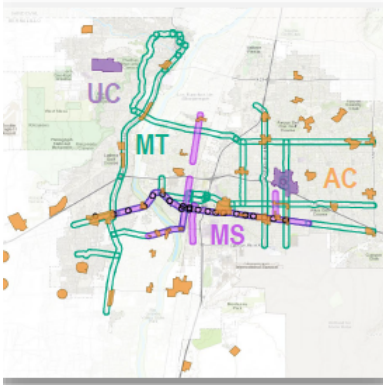
MAXIMUM BUILDING HEIGHTS

R-ML + R-MH Zone Districts

CHANGE / IDO TEXT

Explanation

- Adds a new tier of higher building height in Activity Centers and Major Transit corridors, where additional density is appropriate.
- Bumps up building height in Urban Center, Premium Transit, and Main Street areas accordingly, as the Centers and Corridors where the highest density is appropriate.



AC examples:

- Coors & Montano
- Coors & I-40
- Four Hills Village
- Hoffmantown
- Hiland
- San Mateo & Montgomery

MT examples:

- Coors
- Louisiana
- Lomas
- Menaul
- Montgomery
- San Mateo

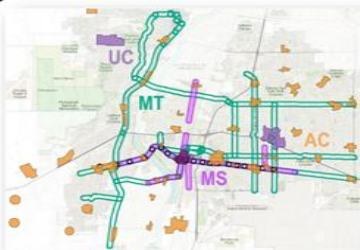
Table 5-1-1: Residential Zone District Dimensional Standards ¹⁴⁵						
AC = Activity Center; MS = Main Street area; MT = Major Transit area; PT = Premium Transit area; UC = Urban Center BR = bedroom DU = dwelling units Note: Any different dimensional standards in Part 14-16-3 (Overlay Zones) and Section 14-16-5.0 (Neighborhood Edges) applicable to the property shall prevail over the standards in this table.						
Zone District	R-A ¹⁴⁴	R-1 ¹⁴⁴	R-MC ¹⁴⁴	R-T ¹⁴⁴	R-ML	R-MH
Side, minimum ¹⁴⁶	10 ft.	R-1A, R-1B, R-3C Interior: 5 ft. ¹⁴⁴ Street side of corner lots: 10 ft. R-3D: 10 ft.	Interior: 5 ft. Street side of corner lots: 10 ft.		Interior: 5 ft. Street side of corner lots: 10 ft. UC-MS-PT: 0 ft.	
Side, maximum			N/A			N/A UC-MS-PT: Street side of corner lots: 15 ft.
Rear, minimum	25 ft. min	R-1A: 10 ft. R-1B, R-1C, R-3D: 15 ft.	10 ft.		15 ft.	
Building Height ¹⁴⁶						
Maximum						
Citywide		26 ft.			38 ft.	48 ft.
AC-MT		N/A			50 ft.	60 ft.
UC-MS-PT		N/A			62 ft.	72 ft.
No maximum		For multi-family residential dwellings in or within 1/4 mile (1,320 ft.) of MS-PT ¹⁴⁷				For portions of a building >100 ft. from all lot lines
		N/A				
Bonuses						
Workforce Housing		N/A			12 ft.	24 ft.
Structured Parking		N/A			12 ft.	24 ft.

Please note: Increasing the building height to increase density and also reduce parking will not work for the West side. The West side has limited amount of bridge crossing and does not have a grid system of roadways to disperse traffic like the North east side of town. The transit service is also very limited and has been unreliable, and should not be used to justify these changes. The IDO has already reduced parking requirements. There is **no need** to reduce parking further.

PARKING REQUIREMENTS

Parking Maximums – Centers + Corridors

Staff



UC = Urban Center
AC = Activity Center
MS = 660 feet from Main Street
PT = 660 feet from Premium Transit station
MT = 660 feet from Major Transit

Item #40 Approved
Conflicts with #C-12 Needs Further Discussion

Explanation

- Eliminates minimum parking requirements in Centers + Corridors as a cost barrier to housing and other development where growth is appropriate.
- Lowers parking maximums for non-residential development in Centers + Corridors, which are meant to be the most walkable urban areas.
- Removes reference to peak service frequency for parking reductions, as all 15-minute service is on corridors that are designated as Major Transit (MT).

CHANGE / IDO TEXT

Table 5-5-4: Maximum Off-street Parking Requirements for Non-residential Development ¹⁴⁸	
DT = Downtown; UC = Urban Center; MS = Main Street area; PT = Premium Transit area AC = Activity Center; MT = Major Transit area	
Area	Parking Maximum for Non-residential Development ¹⁴⁹
Centers + Corridors	
DT-UC-MS-PT areas	100% ±25%
AC-MT areas	125%

Cookie Cutter/Citywide amendments do not work for all areas of the City, especially the Westside. **These Amendments should not move forward.**

Thank You,
Rene' Horvath

Hello my name is Bryan Dombrowski.

I am a homeowner here in Albuquerque and proud member of the Taylor Ranch Neighborhood Association Board of Directors, but these comments are my own.

I am writing in favor and exuberant support for many of the suggested changes to the IDO, particularly those increasing the housing options available city wide - duplexes, townhomes, cottage courts, casitas, and expanded mixed use areas.

I live in a townhome, an option allowed me to live in a neighborhood that was otherwise too expensive. My street has a wide choice of options for housing; from stand alone single family houses, townhomes, 2 stories next to 1 stories, casitas and inlaw suits. All of this is within walking distance of 2 bus lines, a few local businesses, 2 parks, and a community center.

Unfortunately my street is the exception in the larger scope of the west side, and the city as a whole. Zoning codes that restrict naturally affordable housing options don't just make neighborhoods more expensive, it encourages sprawl and subsequent overpaving contributing to the heat island effect. It also keeps working class adults and families off the home ownership ladder by setting that first rung thousands of dollars out of reach. We can't say a thousand zillow listings this month means there is no housing shortage when those houses are unaffordable to most people in our city. These IDO changes encourage quality infill development to prevent sprawl, affordable housing options for renters and homeowners, and allow for small, ground up, changes to gradually grow our communities instead of in drastic, out of touch, and rapid redevelopment.

Please think of those who's backs and wallets the status quo is standing on, and let's give them a seat at the table for a better, more vibrant, and more affordable Albuquerque.

Bryan Dombrowski

My name is Sarah Mock and I am a resident and small business owner here in Albuquerque.

I love living and working in Albuquerque, I love the community that I have found, but worry deeply about its future. Our current zoning code not only encourages sprawl, but also makes so many traditional housing options that used to benefit working class families illegal.

As the city strives to grow, attracting new businesses and workers from within and from out of state, we must have a plan to make that future affordable.

I support the proposed IDO changes. These updates allow people young and old, working and retired to more easily buy, rent, or build the house that is right for them and their families. Cottage courts, casitas, duplexes, and townhomes are all options that allow every community to meet the needs of all its members, not just the wealthiest or newest. These compact housing options not only make our communities more resilient because they are affordable, but they also help local businesses succeed by being walkable and more accessible.

Please support these common sense changes for an Albuquerque of tomorrow that supports all burquenos.

Sincerely, Sarah Mock

Date: November 17, 2025
To: Chair Aragon and Commissioners
Re: 2025 IDO Proposed Amendments

Dear Chair and Commissioners:

The EPC's responsibilities under the IDO are enormous. They include "protecting and improving the environment," promoting the "understanding of planning and environmental matters," advising the administration, council and planning staff on multiple planning and land use policies and protections and reviewing "recommendations, concerns, or comments provided by commenting agencies, departments, stakeholders, and the public prior to final decisions."

Thank you for your service on the Commission and to *all* the people of ABQ. I recognize that your commitment is huge.

Although I have read the 123 pages of Public Comments appended to the Staff Report, I will rely on Patty Willson's summary of those. Of the 53 comments in support of IDO proposals, 2/3 or 21 comments consisted of a form letter, essentially unchanged and effectively one comment. Those opposing the proposed changes, 25 separate comments, wrote individual letters, outline substantive concerns, cite data and examples that refute the underlying assumptions of many proposals and provide graphic examples of reasonably anticipated consequences of proposed amendments.

If the role of the Commissioners was to merely tally public comments, the IDO would not need to establish a list of qualifications for the role of commissioner. Your appointment acknowledges your qualifications to meet the responsibilities the IDO outlines, responsibilities which call for informed analysis and "understanding of planning and environmental matters."

It is unsurprising that ABQ residents have differing visions and perspectives on how our city should develop. (Regrettably, the vast majority of ABQ residents have *no* awareness of the 2025 IDO proposals). Indeed, differences are essential to ABQ thriving. A thriving city also requires unbiased and critical examination of zoning law and proposals to change it.

Commissioners, I respectfully request that as you weigh the merits of every proposed IDO amendment you consider the substance of public comments and examine assumptions about how proposals will work and their impact across the city as well as any claims they will support a grand and inspiring vision.

Thank you for your time and consideration.

Sincerely,
Jane Baechle
Resident, ABQ and Santa Fe Village

Date: November 17, 2025

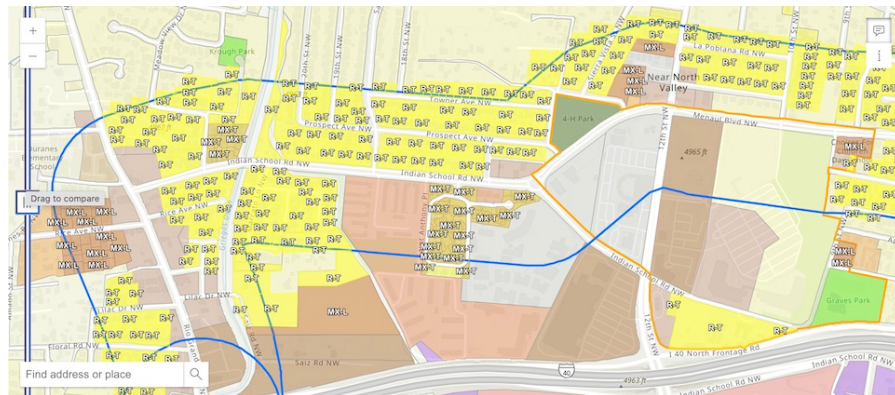
To: Environmental Planning Commission
Re: Project #: PR-2018-001843
Plan #: TA-2025-00002
48-hour comment

Chair Aragon and Commissioners:

Kudos to the Planning Staff for their thorough Supplemental Staff Report, which includes 29 Recommended Conditions of Approval. Some are clear and easy to understand: for example, “*Condition 13. Do not approve the proposed amendment to Off-street Parking for ADU’s to remove the requirement for 1 off-street parking space.*” Others are less clear: for example, “*Condition 4. Adjust and approve the proposed amendment to Sidewalks and Stormwater Management...*” Do the redlines in Attachment D reflect the concerns expressed by AMACFA? Was their comment (“AMACFA does not recommend the proposed change...”) before or after the revised text??

I will focus on two conditions that exemplify how egregious the IDO Update process is—Conditions #21 and #22. These are the proposed legislative zoning conversions for properties within Major Transit (MT) areas and Activity Centers (AC). These two conditions (Item #ZC-3 and #ZC-4) would upzone R-1 to R-T, R-T to MX-T, and R-ML to MX-L, **without any notification to property owners.**

In a letter to Council—after their passage of R-25-175 in September—I asked if there had been any calculation of the number of property owners with the City’s MT corridors. A count of affected R-1 properties in a select screen shot of Indian School (see below) was over 270 lots. How many thousands of property owners stand to have their lots upzoned **without their knowledge or permission?**



At the risk repeating myself, **the problem is with the PROCESS.** Since its initial update in 2019, and with this update, the IDO has had ≈712 changes. No other municipality has had anywhere near that many amendments. Three recent pieces of legislation (O-22-54, O-24-13, and O-24-69) have already made many substantive changes to the IDO—yet **with no data available** regarding their success or failure. Could we see what is and isn’t working before making more changes?

I will also repeat two points from previous letters:

First, I trust that Commissioners have enough experience and knowledge to not be swayed by numbers, especially when ‘flooded’ with form letters. Your responsibilities are greater than counting ‘pros’ and ‘cons’.

Second, the re-framing of the 2025 IDO Biennial Update as “pro-homes policies” is disingenuous—and false—at best. When permissive upzoning is presented as a separate ordinance, it either fails (as with R-25-167) or is currently under litigation (as with O-24-69). Upzoning does not create affordable housing nor end homelessness.

I hope pending changes to City Council will put Albuquerque on a path to better planning, one that leaves the planning to the planners, not the politicians.

Respectfully,

Patricia Willson
Albuquerque resident since 1972

November 11, 2025

Dear EPC Chair Aragon, and fellow Commissioners,

I submitted 2 letters containing my comments on the IDO amendments on November 11th for the Nov. 20th staff report, but I was not able to find either of them in the report! Therefore, I am resending these 2 letters to insure they will be included in the EPC packet for the Nov. 20th hearing. These letters reflect my comments on specific IDO amendments, which I had pinned on the initial spreadsheet containing the first 99 amendments. NOTE: The **IDO update process started with 99 amendments on the original spreadsheet**. It took several weeks to read, research, understand and pin comments onto this first spreadsheet. Then the first spreadsheet was unexpectedly replaced with a **second spreadsheet with 150 amendments and the entire spreadsheet had been rearranged!** The new amendments were inserted throughout the spreadsheet based on category, not just tacked onto the end. To make matters worse, I did not find the comments I originally pinned on the first spreadsheet in the October 28th staff report. Therefore, I am resending my comments, this time, in letter form.

1) #7: Historic Protection Overlay zone: POSTED Comment August 27, 2025: *Albuquerque is fortunate to have so many unique neighborhoods which have a wide range of architectural styles and history, which includes Pueblo, Territorial, Victorian, etc. This is what makes Albuquerque such a fun and interesting place to live. It is my understanding that this would be a tool that a community could use to help maintain their historic architectural character, which I support.*

2) #12 & 13: Carwashes - Change from Permissive to Conditional in MXL & MXH : POSTED Comment August 25th: *A conditional use is better since the number of carwashes has increased significantly in recent years, over saturating the market. This has led many conflicts due to vacuum noise and fumes, when large car washes, are built too close to residents. This amendment will help resolve that. There should also be a distance separation of 200 ft. between large car washes and residential areas, to help reduce nuisance noise and fumes. It terms of the Smaller self serve car wash near apartments, they seem OK, as tenants tend to use them and they are more low key than the larger carwashes.*

3) #18 IDO pg. 157: Cottage development: Minimum size of lot is 10,000 sf.

A 10,000 sq. ft lot is too small for cottage development.

POSTED Comment August 27, 2025: *Maintain the existing IDO language and do not approve this amendment. **Note:** Currently cottage developments are located on a minimum 1 acre lot (43,560 sq.ft.). Reducing the lot size to 10,000 sf citywide is too small to do Cottage/multiple dwellings. A 10,000 sf. lot is the standard size for 1 single family home, maybe two at the most. How many cottage units would a 10,000 sf.lot hold? What about the common open space and the Parking? The IDO was changed to allow cottage development on 10,000sf lots within a quarter mile of UC-MS-PT. It's unclear how well this is working along these corridors. Therefore, maintain current IDO language and don't reduce the lot size 10,000sf citywide. We want cottage development to turn out nice.*

4) #19 IDO pg.160: Duplexes: Allows Duplexes in R-A, R-1, on corner lots that are at least 5000sf.

POSTED Comment August 27, 2025: *A 5000 sq.ft. lot is too small for a duplex, especially on the corner. The typical size lot for one single family home is 10,000sf. What about the parking? Putting 2 homes on a 5000 sf. lot would be problematic, especially on a corner lot, where on-site parking is necessary to avoid problems when vehicles enter and exit the neighborhood. Agree with other posted comments that duplexes would need to be in scale and character with the surrounding neighborhood. This amendment should not move forward.*

5) #20. IDO pg 161. Dwelling Live-work: prohibits cannabis & nicotine sales as Live-work:

POSTED August 25th, 2025: *Agree, cannabis and nicotine should be prohibited, just like liquor retail, within a live work residential building and lot. Support!*

6) 26. IDO pg. 190: Nicotine Retail: This use is prohibited on a lot within 1000 ft. of another primary nicotine use. **POSTED August 27, 2025:** *Support! This will help avoid over saturation of the market.*

7) #29. IDO pg. 212: ADU - Dwelling unit/ height: The maximum height of an ADU shall be 18 ft. or as tall as the primary structure on the property, whichever is greater. An ADU constructed over a detached garage is limited to the height of the zone district.

POSTED Comment August 27, 2025: *Don't support! Maintain current language that the height of a casita is no higher than the primary house. If the applicant wants to go higher, they could request a variance or waiver and address any concerns from adjacent neighbors.*

8) #32.IDO pg. 227: Maximum height for R-ML and R-MH: Add building height maximums for AC - Activity Center & MT - Major Transit, and bump up with UC-MS-PT with a height bonus for structured parking:

POSTED Comment August 27, 2025: *Don't support adding AC & MT to the list with UC-MS-PT in order to increase density and building heights. The IDO has already increased the building heights in Albuquerque, from our previous zone code, raising the building heights to 38 ft. for R-ML and 48 ft. for R-MH, which can be bumped up to 65 ft. in UC-MS-PT. This has created a lot of anger and conflicts within our community. There is no need to increase the building heights any further. Don't support!*

9) #33. IDO pg.232: Maximum building height in Mixed use zones: Add building height in AC-MT to Allow higher densities in Activity Centers and Major Transit corridors. Bump up UC-MS-PT. Add AC to workforce housing bonus and structured parking bonus. Adds building heights to Urban Centers, Main streets, Premium Transit to establish a tiered allowance for building heights in different centers and corridors.

POSTED Comment August 27, 2025: *As mentioned above, the IDO has already up-zoned the zoning to do taller buildings. There is no need to increase the height any further. Do not add AC and MT to do more density and increase building height, even for workforce housing bonus or structured parking. Workforce housing should be a requirement not an incentive to allow taller buildings. Things need to be more in scale and character, with the surrounding area. Don't support!*

10) #36: IDO pg. 274: Reduce Minimum Parking Requirements for multi-family: To reduce housing costs per unit. See new requirements below. See existing requirements crossed out.

1 space / DU for 2 or fewer BDR.	1 space/ studio	1.8 space/DU with 3 or more BDR
1.5 space / DU for 3 or more BDR.	1.2 space/DU for 1 BDR	UC-MS-PT 1 space/DU
1 space/ DU for Workforce housing	1.5 space/ DU with 2 BDR	

POSTED Comment August 27, 2025: *This is a big mistake!!!* *There is no evidence this will reduce housing costs. The parking requirements have already been reduced in previous IDO amendments. Apartment managers and their tenants are already dealing with a shortage of parking spaces for the tenants and their guests, leading to a lot of conflicts that the manager and the tenants have to deal with. This ruins the quality of life for the people living there. The Transit in Albuquerque is very limited and should not be expected to compensate for the lack of apartment parking spaces. People need their cars to get around town for work, shopping, picking up their children at school or sports and doctor appointments, errands, etc. Reduced parking will force tenant parking in the adjacent neighborhoods or in nearby shopping centers, which will also create conflicts. It is not wise to build apartments if there is not enough parking for the tenants, or their guests.*

11) #40. IDO multiple pgs: to establish Parking Maximums to these corridors: UC-AC-MS-MT-PT: to eliminate parking requirements as a cost barrier to housing and other development.

POSTED Comment August 27, 2025: *Don't Support! Parking maximums will make things even worse.* *To remove parking minimums and then place parking maximums is not a good idea. There is no evidence that this will reduce housing costs. For shopping areas that have extra parking space, it allows people to park and ride the bus, even when the level of transit service is lacking and does not cover the whole city. Maintain our existing parking space and don't do any more parking reductions as we want to maintain the quality of life for our citizens. Parking maximums will be a disaster. **This amendment should not be approved!!!***

12) #44: Neighborhood Edge step down protection: Currently building heights are allowed to be 30 ft. within 100 ft. of R-1 property, in UC, MS, PT, Beyond 100 ft. the building height can go higher. Amendment wants to add: MT Major Transit, and reduce NA Edge distance from 100 ft. to 50 ft.

POSTED Comment Aug.22, 2025: *The Neighborhood Edge distance requirement should not be reduced. The Neighborhood Edge allows 30 ft. high buildings within 100 ft. distance from a single family residence. After 100 ft. a building can go a lot higher above 30 ft. high. The 100 ft. Neighborhood edge is already not enough distance. To reduce the 100 ft. distance to 50 ft. is even worse, and will reduce protection for the neighborhoods, causing numerous conflicts in the Community. **Don't support! Maintain the Neighborhood Edge distance of 100 ft. distance.***

13) #45. Multi family facades: **POSTED August 27, 2025:** *Recommend Leaving "side" in there. So it reads: "Each front and street facing and side facade shall meet all of the following requirements...": to maintain an attractive facade.*

14) #49 Pre-submittal Tribal meeting: **POSTED August 28, 2025:** *Tribal Engagement needs to be more effective, especially for the sake of the mesa top, the petroglyphs and volcanoes, and protecting*

the view shed in this area. We need to develop this area more sensitively and respectfully to honor this unique natural and cultural landscape.

15) #50. Bulk Land subdivision: Remove Tribal meeting requirement:

POSTED August 28, 2025: *As mentioned above, Tribal Engagement needs to be more meaningful and effective in protecting our natural cultural resources. Engagement should not be just checking the box, Improve Tribal Engagement with the Tribes, so their issues and concerns will adequately be addressed.*

16. #54: Appeal Standing: A majority of property owners or tenants within 660 ft. of subject site.

POSTED Comment August 28, 2025: *Appeal standing is important and should be for any individual or neighborhood which have issues or concerns that still need to be addressed. **Unfortunately, it seems the only way to get issues addressed, is through Appeals. If the goal of the amendment is to place restrictions on Appeal standing for an individual or Neighborhood Association then it should not be approved.***

17. #72: Changing the definition of Abut to not include corner lots.

POSTED Comment August 28, 2025: *I strongly disagree with changing the definition of the word "Abut" so that it does not include a diagonal corner lot, even when it touches a project site. The benefit of maintaining the definition for the words "abut", and also "adjacent" to include diagonal lots helps in protecting our sensitive lands and neighborhoods better. Development needs to be more sensitive to blend with the built and natural environment and be in scale and character with the surrounding area, which includes abutting and adjacent lots. It is unfortunate the City is continually working to undermine zoning protections which prevents us from achieving attractive developments, which complement the surrounding area. It's important to maintain a strong definition, rather than weaken it. **This amendment should not move forward!***

18) #92: R-1 Dimensional Standards: Removes larger minimum lot sizes and setbacks that raise the cost of housing and exclude lower income households. **POSTED Comment August 28, 2025: *The purpose of Dimensional standards are to set lot sizes and setback requirements to maintain privacy, quality of life and to provide fire protection. This proposal, if implemented, could set the stage for devastating fire storms in closely packed neighborhoods. The **dimensional standards as written should NOT move forward.*****

19) #C-1 & C-2: Zoning Map conversions: to change R-1 single family to multi-family.

C-1) Zoning Map: Convert RA/R-1/R-T to RML apartments-within 1/4 mile of MS & PT corridors, north of Central and east of the River. (Matches the zone map in IDO made by 0-24-69)

C-2) Zoning Map: Convert RA/R-1 to R-T townhouses within 1/4 mile of MS & PT corridors, south of Central and west of the River. (Matches the zone map in IDO made by 0-24-69)

Posted Comment August 28, 2025: *Agree, these zoning conversions are major zone changes that were done during the holidays, without notification, especially to those who will feel the impact of the increased density and building heights, along these corridors. Because of the sneaky way this was handled it is now in litigation and **should not move forward.***

20) #C-3 to C-4: I am Concerned about these zoning conversions.

C-3)Zoning Map: Convert R-A/R-1/R-T to RML in MT areas: Similar to 0-24-69, this conversion allows full range of housing options from single family to apartments within Major Transit corridors.

C-4) Zoning Map: Convert R-A/R-1/R-T to RML in AC areas: Similar to 0-24-69, this conversion allows full range of housing options from single family to apartments within Activity Centers. **Note:** This will affect Coors Blvd. and Golf Course Rd, and Mesa top. **POSTED Comment August 28, 2025:** *The C-3 and C-4 amendments: These zoning conversions are major zone changes that are being done to increase density and building heights along Major Transit Corridor and Activity Centers by changing R-1 to multifamily. The IDO already changed zoning in 2018, to allow zoning categories that allow multifamily. Many apartments have been built or under construction along these corridors. There is no need to do more. There was no prior notification of this amendment to convert R-1, R-A or R-T to RML. This lack of notification is underhanded. 0-24-69 is under litigation and these amendments are premature and should not be approved.*

New Amendment (added to the 150 amendments): *I would like to add my concern for the new City Council amendment regarding underground drainage which Councilor Bassan is proposing.*

(C-1) Infrastructure improvement: Councilor Bassan: To allow Property owners of R-1 and R-A lots to develop prior to building underground drainage improvements at their own risk, with an agreement that these lots will be assessed in the future for the cost when the City constructs these improvements. It also allows an exemption for sidewalks, curb and gutters to also be assessed for the cost when the City builds it in the future.

My Comment: *This Amendment should not move forward. Underground drainage improvements are extremely important and should not be deferred. Allowing development to proceed without critical drainage infrastructure will cause havoc and litigation. Several Civil engineers have also expressed concerns about this proposal as well.*

There are many other Amendments that need more analysis and should not be approved. This IDO amendment process is too complex and overwhelming especially with 150 amendments and does not foster good Planning. Good Planning is about developing good design which will provide protection for surrounding neighborhoods and complement the things the community values. It is important to maintain the natural, historic, and cultural character of Albuquerque as well as the quality of life for its citizens.

Thank You,
Rene' Horvath

November 11, 2025

Dear EPC Chair Aragon, and fellow Commissioners,

In reviewing the new 150 amendments on the EPC web page, I especially want to express my concerns regarding the proposed amendments regarding zoning conversions along Major Transit corridors and Activity Centers. These conversions are significant zone changes which will impact many corridors, including the West side, these proposals will increase the building heights and density. The IDO already increased the building heights from the prior zone code. This has created numerous conflicts due to the buildings being too tall and out of character for the surrounding areas, affecting residents and our sensitive areas. The Westside has the Bosque and the Mesa top with the volcanoes, and the Petroglyphs which have spectacular views that we want to preserve. Coors Blvd. is a view corridor where views are highly valued. The views to and from the Mesa top including the escarpment and volcanoes are equally important to preserve. There has been no public discussion concerning these up-zone proposals which will affect the residents along these corridors. There are also numerous amendments proposing to reduce the parking for multi-family and workforce housing which will make things even worse. **R-1, R-T, R-ML should NOT be up-zoned. See amendment below.**

- Amendments: **#ZC-3 & # ZC-4) Zoning conversion for MT (Major Transit corridors) & AC (Activity Centers) to change (R-1 to RT Town house) (R-T to MX-T multi family)(R-ML to MXL). Should not be approved!**

Staff

Condition
#21 & 22
Approve

ZONING CONVERSION

in Major Transit Corridors and Activity Centers

2025
IDO
Update

CHANGE


Explanation
• R-1 → R-T to allow housing options from single-family though townhouse
• R-T → MX-T to allow housing options from duplex though multi-family
• R-ML → MX-L to allow housing options from townhouse though multi-family

Item #ZC-3
Approved

Item #ZC-4
Approved

R-1 = Residential – Single-family
R-T = Residential – Townhouse
R-ML = Residential – Multi-family Low Density
MX-T = Mixed-use – Transition
MX-L = Mixed-use – Low Intensity

IDO INTERACTIVE MAP



MT = 660 feet from Major Transit Corridor
AC = Activity Center

<https://abq-zone.com/node/1937>

In addition: ZC -3 and ZC-4 are also proposing to increase the building heights.

See Below for the proposed changes to increase the building heights in amendments: ZC-3 and ZC-4

ZONING CONVERSIONS

MT-AC AREAS

2025
IDO
Update

Original Zoning	Current Building Height Maximum - Citywide	Zoning Conversion	Post-conversion Building Height Maximum ¹		
			Current Citywide	Proposed AC-MT ³	Proposed UC-MS-PT ³
R-1	26 feet	R-T	26 feet	N/A	N/A
R-T	26 feet	MX-T ³	30 feet	42 feet	54 feet
R-ML	38 feet ²	MX-L ³	38 feet ²	50 feet	62 feet

- 1 Subject to Neighborhood Edge, limiting heights to 30 feet near low-density residential development [IDO §14-16-5-9(C)].
- 2 Currently eligible for height bonuses for UC-MS-PT areas, workforce housing, and structured parking.
- 3 Item #33 proposes by-right maximums for AC-MT, bumps up by-right maximums for UC-MS-PT accordingly, and adds AC to existing height bonuses for workforce housing and structured parking.

Item #ZC-3
Approved
Item #ZC-4
Approved

AC = Activity Center
MT = Major Transit
UC = Urban Center
MS = Main Street
PT = Premium Transit

There are other IDO amendments: #32, #33, #40, that are also proposing to increase the building height and reduce the parking along Coors Blvd., Golf Course road, and the Mesa top. These amendments should also **NOT** be approved.

MAXIMUM BUILDING HEIGHTS

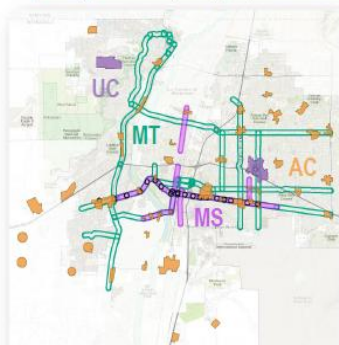
Mixed-Use Zone Districts

Par
5

CHANGE / IDO TEXT

Staff

- Explanation**
- Adds a new tier of higher building height in Activity Centers and Major Transit corridors, where additional density is appropriate.
 - Bumps up building height in Activity Centers, Urban Center, Premium Transit, and Main Street areas accordingly, as the Centers and Corridors where the highest density is appropriate.



AC examples:

- Coors & Montano
- Coors & I-40
- Four Hills Village
- Hoffmantown
- Hiland
- San Mateo & Montgomery

MT examples:

- Coors
- Louisiana
- Lomas
- Menaul
- Montgomery
- San Mateo

Item #33
Approved

Table 5-1-2: Mixed-use Zone District Dimensional Standards					
AC = Activity Center; MS = Main Street area; MT = Major Transit area; PT = Premium Transit area; UC = Urban Center					
BR = bedroom DU = dwelling units					
Note: Any different dimensional standards in Part 14-16-3 (Overlay Zones) and Section 14-16-5-9 (Neighborhood Edges) applicable to the property shall supersede the standards in this table.					
Zone District	MX-L ^{1,2}	MX-L	MX-M	MX-H	
Site Standards					
Usable open space, minimum ^{1,2}	Efficiency or 1 BR: 225 sq. ft./unit 2 BR: 285 sq. ft./unit ≥3 BR: 350 sq. ft./unit UC-MS-PT: 50% reduction				
Setbacks^{1,2,3,4}					
Front, minimum	5 ft. UC-MS-PT: 0 ft. ²				
Front, maximum	N/A UC-MS-PT: 15 ft.				
Side, minimum	Interior: 0 ft.; Street side of corner lots: 5 ft. UC-MS-PT: 0 ft.				
Side, maximum	N/A UC-MS-PT: Interior: N/A; Street side of corner lots: 15 ft. ²				
Rear, minimum	15 ft. UC-MS-PT: 0 ft. where rear lot line abuts a street or alley				
Rear, maximum	N/A				
Building Height^{2,3,4}					
Maximum	Citywide	30 ft.	38 ft.	48 ft.	68 ft.
No maximum	AC-MT	42 ft.	50 ft.	60 ft.	80 ft.
	UC-MS-PT	54 ft.	62 ft.	72 ft.	92 ft.
	For multi-family residential dwellings in or within ¼ mile (1,320 ft. of MS-PT) ^{1,2}				
	N/A		For portions of building >100 ft. from all lot lines		
Bonuses					
Workforce Housing	AC-MT: 12 ft. UC-MS-PT: 24 ft. ²				
Structured Parking	UC-AC-MS-PT-MT: 12 ft.			UC-AC-MS-PT-MT: 24 ft.	

See Below for Amendment #32: also proposing to increase the building heights for R-ML & R-MH multi-family zones.:

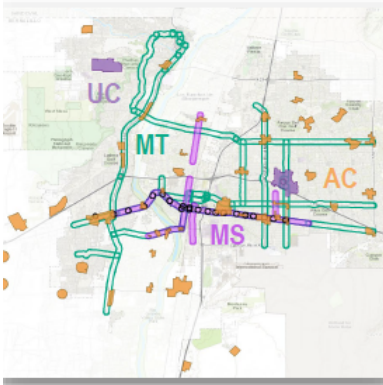
MAXIMUM BUILDING HEIGHTS

R-ML + R-MH Zone Districts

CHANGE / IDO TEXT

Explanation

- Adds a new tier of higher building height in Activity Centers and Major Transit corridors, where additional density is appropriate.
- Bumps up building height in Urban Center, Premium Transit, and Main Street areas accordingly, as the Centers and Corridors where the highest density is appropriate.



AC examples:

- Coors & Montano
- Coors & I-40
- Four Hills Village
- Hoffmantown
- Hiland
- San Mateo & Montgomery

MT examples:

- Coors
- Louisiana
- Lomas
- Menaul
- Montgomery
- San Mateo

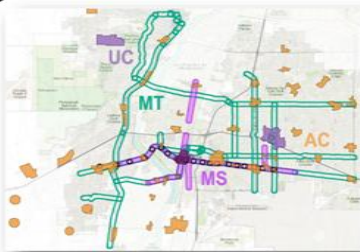
Zone District	R-A	R-1	R-MC	R-T	R-ML	R-MH
Side, minimum ⁽²⁾	10 ft.	R-1A, R-1B, R-3C Interior: 5 ft. Street side of corner lots: 10 ft. R-3D: 10 ft.	Interior: 5 ft. Street side of corner lots: 10 ft.		Interior: 5 ft. Street side of corner lots: 10 ft. UC-MS-PT: 0 ft.	
Side, maximum			N/A			N/A UC-MS-PT: Street side of corner lots: 15 ft.
Rear, minimum	25 ft. min	R-1A: 10 ft. R-1B, R-1C, R-3D: 15 ft.	10 ft.		15 ft.	
Building Height ⁽³⁾						
Maximum						
Citywide		26 ft.			38 ft.	48 ft.
AC-MT		N/A			50 ft.	60 ft.
UC-MS-PT		N/A			62 ft.	72 ft.
No maximum		For multi-family residential dwellings in or within 1/4 mile (1,320 ft.) of MS-PT ⁽⁴⁾				For portions of a building >100 ft. from all lot lines
		N/A				
Bonuses						
Workforce Housing		N/A			12 ft.	25 ft.
Structured Parking		N/A			12 ft.	24 ft.

Please note: Increasing the building height to increase density and also reduce parking will not work for the West side. The West side has limited amount of bridge crossing and does not have a grid system of roadways to disperse traffic like the North east side of town. The transit service is also very limited and has been unreliable, and should not be used to justify these changes. The IDO has already reduced parking requirements. There is **no need** to reduce parking further.

PARKING REQUIREMENTS

Parking Maximums – Centers + Corridors

Staff



UC = Urban Center
AC = Activity Center
MS = 660 feet from Main Street
PT = 660 feet from Premium Transit station
MT = 660 feet from Major Transit

Item #40 Approved
Conflicts with #C-12 Needs Further Discussion

Explanation

- Eliminates minimum parking requirements in Centers + Corridors as a cost barrier to housing and other development where growth is appropriate.
- Lowers parking maximums for non-residential development in Centers + Corridors, which are meant to be the most walkable urban areas.
- Removes reference to peak service frequency for parking reductions, as all 15-minute service is on corridors that are designated as Major Transit (MT).

CHANGE / IDO TEXT

Area	Parking Maximum for Non-residential Development ⁽¹⁾
Centers + Corridors	
DT-UC-MS-PT areas	100% ±25%
AC-MT areas	125%

Cookie Cutter/Citywide amendments do not work for all areas of the City, especially the Westside. **These Amendments should not move forward.**

Thank You,
Rene' Horvath

November 17, 2025

Dear EPC Chair Aragon, and fellow Commissioners,

Another amendment that should be reconsidered is :

C-1 Infrastructure improvement: Councilor Bassan: To allow Property owners of R-1 and R-A lots to develop prior to building underground drainage improvements at their own risk, with an agreement that these lots will be assessed in the future for the cost when the City constructs these improvements. It also allows an exemption for sidewalks, curb and gutters to also be assessed for the cost when the City builds it in the future.

The October 28 Staff report on Pg. 89, describes the amendment:

.....For storm water infrastructure, the amendment allows properties to develop without underground drainage if owners record an agreement **acknowledging that future City-initiated improvements may be assessed**. These changes introduce flexibility for infill development in lower-density areas with limited infrastructure and retain mechanisms for cost recovery if improvements are installed at a later time. The EPC should weigh potential short-term benefits against the possibility of long-term impacts to neighborhood connectivity and storm water management

*My concern is the City will be liable for damages caused by allowing construction prior to mitigation of flooding. Construction of necessary drainage improvements prior to the utilization of a piece of property are mandatory to preserve the public's safety. **This amendment would potentially create liability for the City and should not be approved.** AMFCA has expressed concerns too. Here is AMAFCA's response in the Oct. 28th Staff Report:*

COMMENTS FROM OTHER AGENCIES

BERNALILLO COUNTY

No adverse comments.

ALBUQUERQUE METROPOLITAN ARROYO FLOOD CONTROL AUTHORITY

"AMAFCA does not recommend the proposed change to the amendment Item C-1 regarding the deferral of drainage improvements. The amendment lists no conditions to which a property zoned R-1 or R-A must meet in order to defer said drainage improvements and may result in 1) increased flood risk to properties where required drainage infrastructure is not constructed, 2) a likely deficiency of funding available to construct the needed infrastructure (future costs tend to be higher), and 3) a perpetual delay of needed drainage infrastructure.

AMAFCA recommends development of conditions/criteria for which a property zoned R-1 or R-A must meet in order to be exempt from underground drainage infrastructure improvements before such text amendment is approved."

Thank you,
Rene' Horvath

To the Environmental Planning Commission,

My name is Steven Holman and with my Husband Jesus Castro we have started a community-based petition against the Upzoning amendments to the IDO that allow for R-1 Zoning changes to parking minimums as well as off street, allowing apartments, allowing townhomes, allowing duplexes, and allowing bodegas without notification, without planning, with reduced height restrictions, and without community input. We reside in Albuquerque within District 7. We have gone from 289 petition signatures a week ago and are now at over 450 signatures from residents against these proposals. More and more community members are against these proposals as they learn about them. In fact, in every instance where there has been community input and interaction, they are voted down.

It appears counter to the purpose of the IDO and building a stronger Albuquerque that we are pushing to exclude the very people who've lived here and built their home from having any input into the future of this city. When it comes to the environmental and infrastructure impacts of Upzoning, nothing appears to have been considered with these changes being created to *hopefully* increase the density and population of Albuquerque.

I ask the Commission when considering climate change, water rights, and living in a desert climate, has there been any consideration or study of the impact an increased population and density will have on our water supply? What about considerations or studies about impacts to our wastewater runoff? Have there been any studies on the increased danger of fire, like in Los Angeles, when you have a dry climate that is fire prone with homes in such close proximity to each other? Have there been any studies into the impact on our electrical grid? What about studies on the reduction in green outdoor spaces with densification? When you increase density, you increase vehicular traffic. Have there been any studies or planning on the impacts that increased vehicular traffic will have on the air quality here? What about the changes to roads and traffic patterns needed to accommodate the increased traffic and parking needs? What about protections for historic places like Old Town or National Monuments like The Petroglyphs? Have there been any studies on how these proposals could negatively impact those places?

There needs to be further study of these changes as Albuquerque is a unique environment. A carte blanche pro-development initiative such as this does not work as a one size fits all solution.

Besides the environmental impacts, the further issues presented by Upzoning are starting to be clear as more studies and journalism discover its inequity via gentrification, increased costs of living and reduction in racial diversity. The progressive YIMBY Movement

who supports these amendments have been co-opted by corporate and private equity interests such as the Koch Brothers, BlackRock, and AirBnB. Local Community Organizations like StrongTowns Abq, while well meaning, are still a nationally backed group and have even had their messaging co-opted by local developer and political interests. These are powerful players at work to ensure the passage of these amendments, using their resources to paint only part of the picture and are counter to actual citizen-driven involvement and self-determination.

These amendments as written in no way address affordable housing, in fact they in no way allocate for it at all in the language. Removing all the guard rails of zoning with no studies on environmental impacts, no planning process, and no community involvement hands over the reigns of this city to private equity and developer interests. This is giving our entire residential communities over to the same interests that created the issue of affordability to begin with.

Ask any marginalized group, be they African American, Hispanic, Asian, Indigenous, or even LGBTQIA and they will point to every erasure of culture and history being linked directly to vested interests and the Government coming in and saying they know what is best. If you want equity and inclusion, then you engage with communities and work with them to ensure that their voices are heard, because that is what public servants should do.

My Husband and I, as well as the petition signers, in no way support this haphazard and potentially disastrously exclusionary set of amendments that will likely gentrify, whitewash, and erase the history and culture of this city in favor of developer backed urbanization initiatives that will increase fire danger, jeopardize our water resources, and further pollute our air due to increased vehicles.

We all are watching and ask that you say no and do not recommend these amendments.

Thank you,

Steven Holman

Jesus Castro

And over 450 petition signers growing every day...

Name	City	State	Postal Code	Country	Signed On
Steven Holman	Albuquerque	NM	87110	United States	2025-11-03
Joanna Gallegos	Albuquerque	NM	87110	United States	2025-11-03
Lawson Moore	Albuquerque	NM	87110	United States	2025-11-03
Dave Armstrong	Albuquerque	NM	87111	United States	2025-11-04
Brenda Van Van Den Brink	Albuquerque	NM	87112	United States	2025-11-04
Dena Barnard	Albuquerque	NM	87114	United States	2025-11-04
Art Martinez	Albuquerque	NM	87120	United States	2025-11-04
Howard Gurule	Albuquerque	NM	87106	United States	2025-11-04
Carrie Wells	Albuquerque	NM	87107	United States	2025-11-04
Ernest Sturdevant	Albuquerque	NM	87112	United States	2025-11-04
Daniel Sanchez	Albuquerque	NM	87120	United States	2025-11-04
Azadeh Mehrnoosh	Albuquerque	NM	87111	United States	2025-11-04
Arash Mehrnoosh	Albuquerque	NM	87123	United States	2025-11-04
Sean Abeyta	Albuquerque	NM	87114	United States	2025-11-04
David Chavez	Albuquerque	NM	87111	United States	2025-11-04
Nicollette Raymond	Albuquerque	NM	87111	United States	2025-11-04
Gina Koch	Albuquerque	NM	87107-2813	United States	2025-11-04
Olivia Jamieson	Albuquerque	NM	87121	United States	2025-11-04
Pearly Gates	Albuquerque	NM	87106	United States	2025-11-04
Susan Arnett	Albuquerque	NM	87110	United States	2025-11-04
Paul elwell	Albuquerque	NM	87106	United States	2025-11-04
Tommy Jaramillo	Albuquerque	NM	87123	United States	2025-11-04
Elizabeth White	Albuquerque	NM	87110	United States	2025-11-04
Yolanda McGinn	Albuquerque	NM	87105	United States	2025-11-04
Carolyn Meehan	Albuquerque	NM	87106	United States	2025-11-04
Kathleen Leiter	Albuquerque	NM	87110	United States	2025-11-04
Christine Conlin	Albuquerque	NM	87106	United States	2025-11-04
Caroline Bleil	Albuquerque	NM	87114	United States	2025-11-04
Ann Waller	Albuquerque	NM	87120	United States	2025-11-04
Emily Avilucea	Albuquerque	NM	87106	United States	2025-11-05
Patricia Williams	Albuquerque	NM	87110	United States	2025-11-05

Rosemary Maguire	Albuquerque	NM	87122	United States	2025-11-05
Jody Tatum	Albuquerque	NM	87114	United States	2025-11-05
Sarah Fingerlos	Albuquerque	NM	87110	United States	2025-11-05
Karen Zavala	Albuquerque	NM	87110	United States	2025-11-05
Robert Busse	Albuquerque	NM	87109	United States	2025-11-05
Alice Vogel	Albuquerque	NM	87106	United States	2025-11-05
Michael Livermore	Albuquerque	NM	87122	United States	2025-11-05
Molly Crosby	Albuquerque	NM	87120	United States	2025-11-05
Pamela Pettit	Albuquerque	NM	87112	United States	2025-11-05
Nancy Farley	Albuquerque	NM	87106	United States	2025-11-05
Holly Wong Jones	Albuquerque	NM	87111	United States	2025-11-05
Barbara Vinikas	Albuquerque	NM	87112	United States	2025-11-05
Jane Baechle	Albuquerque	NM	87120	United States	2025-11-05
Brian Cox	Albuquerque	NM	87123	United States	2025-11-05
JONATHAN CAIRNS	Albuquerque	NM	87110	United States	2025-11-05
Dolores Esparza	Albuquerque	NM	87111	United States	2025-11-05
Pamela Melgaard	Albuquerque	NM	87111	United States	2025-11-05
Shannon Mick	Albuquerque	NM	87111	United States	2025-11-05
Robert Mathis	Albuquerque	NM	87107	United States	2025-11-05
Marcia Haney	Albuquerque	NM	87112	United States	2025-11-05
Darlene Marsh	Albuquerque	NM	87111	United States	2025-11-05
Jay Jacobi	Albuquerque	NM	87109	United States	2025-11-05
Sylva Murdoch	Albuquerque	NM	87111	United States	2025-11-05
Susan Beard	Albuquerque	NM	87110-7725	United States	2025-11-05
Evelyn Rivera	Albuquerque	NM	87120	United States	2025-11-05
Peggy Clark	Albuquerque	NM	87109	United States	2025-11-05
Glenda Lorenz	Albuquerque	NM	87108	United States	2025-11-05
Ralph Thompson	Albuquerque	NM	87106	United States	2025-11-05
Rita Garcia	Albuquerque	NM	87114	United States	2025-11-05
Holly Lopeman	Albuquerque	NM	87113	United States	2025-11-05
Monique Herrera	Albuquerque	NM	87120	United States	2025-11-05
KAREN HORST	Albuquerque	NM	87120	United States	2025-11-05

Ann McGregor	Albuquerque	NM	87105	United States	2025-11-05
David Salgado	Albuquerque	NM	87110	United States	2025-11-05
Diane Plummer	Albuquerque	NM	87108	United States	2025-11-05
Ann Speed	Albuquerque	NM	87111	United States	2025-11-05
Jeffrey Dunn	Albuquerque	NM	87111	United States	2025-11-05
AMBROS MONTOYA	Albuquerque	NM	87107	United States	2025-11-05
Crystal Medina	Albuquerque	NM	87121	United States	2025-11-05
Marta Ortega	Albuquerque	NM	87120	United States	2025-11-05
Corrina Hughes	Albuquerque	NM	87120	United States	2025-11-06
Lyle Petersen	Albuquerque	NM	87109	United States	2025-11-06
Robin Stoneking	Albuquerque	NM	87113	United States	2025-11-06
Tanya Leonard	Albuquerque	NM	87122	United States	2025-11-06
Ann Martin	Albuquerque	NM	87109	United States	2025-11-06
Ron Faich	Albuquerque	NM	87112-2822	United States	2025-11-06
Allison Kelly	Albuquerque	NM	87109	United States	2025-11-06
Judie Pellegrino	Albuquerque	NM	87113	United States	2025-11-06
Jocelyn Powe	Albuquerque	NM	87110	United States	2025-11-06
Susan Guenette	Albuquerque	NM	87122	United States	2025-11-06
roger frakes	Albuquerque	NM	87120	United States	2025-11-06
Paul Moran	Albuquerque	NM	87112	United States	2025-11-06
Daniel Collins	Albuquerque	NM	87112	United States	2025-11-06
Tim Oswald	Albuquerque	NM	87112	United States	2025-11-06
Kate Cooper	Albuquerque	NM	87112	United States	2025-11-06
Ric Kain	Albuquerque	NM	87112	United States	2025-11-06
William Sobien	Albuquerque	NM	87123	United States	2025-11-06
Ashley Irvin	Albuquerque	NM	87107	United States	2025-11-06
Aura Alzate	Albuquerque	NM	87107	United States	2025-11-06
Debra Arredondo	Albuquerque	NM	87121	United States	2025-11-06
Joy Pfeil	Albuquerque	NM	87109	United States	2025-11-06
Joe Santa Ana	Albuquerque	NM	87114	United States	2025-11-06
Sue DeVore	Albuquerque	NM	87120	United States	2025-11-06
Betsy Noel	Albuquerque	NM	87106	United States	2025-11-06

Debra Wynn	Albuquerque	NM	87120	United States	2025-11-06
Tanna Frein-Loddy	Albuquerque	NM	87114	United States	2025-11-06
Rose Liggon	Albuquerque	NM	87107	United States	2025-11-06
Frances Fisk	Albuquerque	NM	87198	United States	2025-11-06
Bethany Nance	albuquerque	NM	87112	United States	2025-11-06
Rochelle Wagner	Albuquerque	NM	87199	United States	2025-11-06
Yvonne A Salazar	Albuquerque	NM	87123	United States	2025-11-06
Katrinka Sullivan	Albuquerque	NM	87110	United States	2025-11-06
Robert Perlichek	Albuquerque	NM	87121	United States	2025-11-06
Elsa Bumstead	Albuquerque	NM	87111	United States	2025-11-06
Kristi Hofheins	Albuquerque	NM	87113	United States	2025-11-06
Linda Hellyer	Albuquerque	NM	87110	United States	2025-11-06
Debbie Chavez	Albuquerque	NM	87114	United States	2025-11-06
Peggy Abby	ABQ	NM	87104	United States	2025-11-06
Nina Kane	Albuquerque	NM	87112	United States	2025-11-06
Lee Whitling	Albuquerque	NM	87112	United States	2025-11-06
Michelle Johnson	Albuquerque	NM	87110	United States	2025-11-06
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Carol Baness	Albuquerque	NM	87120	United States	2025-11-06
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Cathy Burns	Albuquerque	NM	87105	United States	2025-11-06
Mary Birch	Albuquerque	NM	87110	United States	2025-11-06
Patricia Hagar	Albuquerque	NM	87122	United States	2025-11-06
Christopher Martinez	Albuquerque	NM	87121	United States	2025-11-06
Leah Davidson	Albuquerque	NM	87106	United States	2025-11-06
Cristina Beato	Albuquerque	NM	87122	United States	2025-11-06
Janis LaFountain	Albuquerque	NM	87104	United States	2025-11-06
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Lauren Robinson	Albuquerque	NM	87110	United States	2025-11-06
Matthew Terlesky	Albuquerque	NM	87111	United States	2025-11-06
Myrna Patterson	Albuquerque	NM	87120	United States	2025-11-06

WILLIAM KUREY	Albuquerque	NM	87109	United States	2025-11-06
Virginia Myers	Albuquerque	NM	87109	United States	2025-11-06
Becky Pritchett	Albuquerque	NM	87121	United States	2025-11-06
Walter Olson	Albuquerque	NM	87111	United States	2025-11-06
Lydia narro	Albuquerque	NM	87121	United States	2025-11-06
Sharon Knowles	Albuquerque	NM	87111	United States	2025-11-06
Robert Perry	Albuquerque	NM	87121	United States	2025-11-06
Floyd CALDWELL	Albuquerque	NM	87120	United States	2025-11-06
Christine Neal	Albuquerque	NM	87110	United States	2025-11-06
Mark Gramer	Albuquerque	NM	87120	United States	2025-11-06
JoAnn Montano	Albuquerque	NM	87112	United States	2025-11-06
JAN Caron	Albuquerque	NM	87112	United States	2025-11-07
D Rymarz	Albuquerque	NM	87120	United States	2025-11-07
Joyce Carabajal	Albuquerque	NM	87110	United States	2025-11-07
Dorothy Otero	Albuquerque	NM	87108	United States	2025-11-07
robert sanchez	albuquerque	NM	87123	United States	2025-11-07
Roybal Anna m	Albuquerque	NM	87120	United States	2025-11-07
Amanda Shaffer	Albuquerque	NM	87107	United States	2025-11-07
Rob E	Albuquerque	NM	87120	United States	2025-11-07
James Chmelicek	Albuquerque	NM	87120	United States	2025-11-07
Joyce Erickson	Albuquerque	NM	87110	United States	2025-11-07
Cassandra Vanderpool	Albuquerque	NM	87106	United States	2025-11-07
David Trujillo	Albuquerque	NM	87111	United States	2025-11-07
Joseph Garcia	Albuquerque	NM	87105	United States	2025-11-07
Valerie Moeller	Albuquerque	NM	87108	United States	2025-11-07
Terri Gallegos	Albuquerque	NM	87105	United States	2025-11-07
Sandra Steidl	Albuquerque	NM	87108	United States	2025-11-07
Monica Rodriguez	Albuquerque	NM	87113	United States	2025-11-07
Susan Washburn	Albuquerque	NM	87112	United States	2025-11-07
Michael Golden	Albuquerque	NM	87120	United States	2025-11-07
Carol O'Brien	Albuquerque	NM	87109	United States	2025-11-07
Patricia Rand-Klarkowski	Albuquerque	NM	87109	United States	2025-11-07

Arlene Hanson	Albuquerque	NM	87105	United States	2025-11-07
Linda Durand	Albuquerque	NM	87107	United States	2025-11-07
Linda Andrews	Albuquerque	NM	87123	United States	2025-11-07
Robert Greenwalt	Albuquerque	NM	87107	United States	2025-11-07
James Gouker	Albuquerque	NM	87113	United States	2025-11-07
Geraldine Boden	Albuquerque	NM	87123	United States	2025-11-07
Christina Maris	Albuquerque	NM	87114	United States	2025-11-07
Margaret Brawley	Albuquerque	NM	87111	United States	2025-11-07
Kathy Kleyboecker	Albuquerque	NM	87110	United States	2025-11-07
Leslie Mayfarth	Albuquerque	NM	87123	United States	2025-11-07
Kathy Vazquez	Albuquerque	NM	87107	United States	2025-11-07
Kathleen Buckley	Albuquerque	NM	87110	United States	2025-11-07
Jim Gallegos	Albuquerque	NM	87114	United States	2025-11-07
Leslie A Black	Albuquerque	NM	87120	United States	2025-11-07
Deborah Conger	Albuquerque	NM	87123	United States	2025-11-07
Jacques Lemelin	Albuquerque	NM	87111	United States	2025-11-07
Richard Schaefer	Albuquerque	NM	87120	United States	2025-11-07
Susan Shaffer	Albuquerque	NM	87107	United States	2025-11-08
Mary Lopez	Albuquerque	NM	87121	United States	2025-11-08
Cynthia Embree	Albuquerque	NM	87121	United States	2025-11-08
Lupe Lopez	Albuquerque	NM	87120	United States	2025-11-08
Ami Besing	Albuquerque	NM	87109	United States	2025-11-08
Rebecca Gibson	Albuquerque	NM	87104	United States	2025-11-08
Everest Sewell	Albuquerque	NM	87106	United States	2025-11-08
Margaret Hertel	Albuquerque	NM	87111	United States	2025-11-08
Sylviana Schanefelt	Albuquerque	NM	87111	United States	2025-11-08
Meredith Haney	Albuquerque	NM	87122	United States	2025-11-08
Kathleen Montgomery	Albuquerque	NM	87120	United States	2025-11-08
Loretta Naranjo Lopez	Albuquerque	NM	87102	United States	2025-11-08
Stephanie Hansen	Albuquerque	NM	87114	United States	2025-11-08
Cheryl Gibson	Albuquerque	NM	87110	United States	2025-11-08
Tom Cockroft	ABQ	NM	87112	United States	2025-11-08

ALAN PULSIPHER	Albuquerque	NM	87112	United States	2025-11-08
Myra Garcia	Albuquerque	NM	87109	United States	2025-11-08
gary fitzgibbon	Albuquerque	NM	87110	United States	2025-11-08
Esther Starr	Albuquerque	NM	87123	United States	2025-11-08
Rene' Horvath	Albuquerque	NM	87120	United States	2025-11-08
Steve Finch	Albuquerque	NM	87107	United States	2025-11-08
Jeryl MacCornack	Albuquerque	NM	87110	United States	2025-11-08
Samuel H Torres Jr	Albuquerque	NM	87109	United States	2025-11-08
Rosalind Hunter-Anderson	Albuquerque	NM	87106	United States	2025-11-08
Linda Wood	Albuquerque	NM	87112	United States	2025-11-08
Erika Herrera	Albuquerque	NM	87114	United States	2025-11-08
Lorrie Martinez	Albuquerque	NM	87114	United States	2025-11-08
Janie Thomas	Albuquerque	NM	87110	United States	2025-11-08
Susan Michie	Albuquerque	NM	87106	United States	2025-11-08
Daniel Regan	Albuquerque	NM	87109	United States	2025-11-08
Jarrod Godwin	Albuquerque	NM	87111	United States	2025-11-08
Esther Leyba	Albuquerque	NM	87107	United States	2025-11-08
Sharon Karpinski	Albuquerque	NM	87107	United States	2025-11-08
Karla McClelen	Albuquerque	NM	87121	United States	2025-11-08
Robert Huntsman	Albuquerque	NM	87111	United States	2025-11-08
James Hernandez	Albuquerque	NM	87109	United States	2025-11-08
Linda Davis-Waldrep	Albuquerque	NM	87108	United States	2025-11-08
Joanna Gallegos	Albuquerque	NM	87110	United States	2025-11-08
Louise Greenwalt	Albuquerque	NM	87107	United States	2025-11-08
David Levine	Albuquerque	NM	87109	United States	2025-11-09
Robert MATTISON	Albuquerque	NM	87123	United States	2025-11-09
STEPHEN STANGE	Albuquerque	NM	87121	United States	2025-11-09
Stephen Mahony	Albuquerque	NM	87104	United States	2025-11-09
Michael Ward	Albuquerque	NM	87109	United States	2025-11-09
Kim Trinosky	Albuquerque	NM	87112	United States	2025-11-09
Sheri Benischek	Albuquerque	NM	87110	United States	2025-11-09
Susan wood	Albuquerque	NM	87111	United States	2025-11-09

Russell LEONARDINI	Albuquerque	NM	87114	United States	2025-11-09
Janet Mednik	Albuquerque	NM	87111	United States	2025-11-09
Karen Martel	Albuquerque	NM	87111	United States	2025-11-09
Jacquekyn Cooke	Albuquerque	NM	87120	United States	2025-11-09
David Fessler	Albuquerque	NM	87107	United States	2025-11-09
Deborah Dodd	Albuquerque	NM	87120	United States	2025-11-09
Richard Whiteside	Albuquerque	NM	87112	United States	2025-11-09
Geni Roberts	Albuquerque	NM	87113	United States	2025-11-09
paulette moore	Albuquerque	NM	87109	United States	2025-11-09
Kathryn Younh	Albuquerque	NM	87112	United States	2025-11-09
Susan Sullivan	Albuquerque	NM	87111	United States	2025-11-09
Elaine Candelaria	Albuquerque	NM	87120	United States	2025-11-09
Tabitha Crawford	Albuquerque	NM	87102	United States	2025-11-09
Lori Snyder	Albuquerque	NM	87112	United States	2025-11-09
Andrew Gray	Albuquerque	NM	87109	United States	2025-11-09
Jackie Schmitt	Albuquerque	NM	87123	United States	2025-11-09
john freeman	Albuquerque	NM	87120	United States	2025-11-09
Linda Vrooman	Albuquerque	NM	87120	United States	2025-11-09
A PRINZ	Albuquerque	NM	87120	United States	2025-11-09
Jodi Yount	Albuquerque	NM	87120	United States	2025-11-09
Regina Moynihan	Albuquerque	NM	87120	United States	2025-11-09
Orlando Torres	Albuquerque	NM	87107	United States	2025-11-09
Deby Freeman Hughes	Albuquerque	NM	87122	United States	2025-11-09
Gerald Knoll	Albuquerque	NM	87109	United States	2025-11-09
Marisela Estrada	Albuquerque	NM	87105	United States	2025-11-10
Margaret O'Daniel	Albuquerque	NM	87105	United States	2025-11-10
Patricia Willson	Albuquerque	NM	87114	United States	2025-11-10
Stephen Ganger	Albuquerque	NM	87123	United States	2025-11-10
Janette Kimberlin	Albuquerque	NM	87120	United States	2025-11-10
CATHERINE SANCHEZ	Albuquerque	NM	87102	United States	2025-11-10
Esther Sifuentes	Albuquerque	NM	87110	United States	2025-11-10
JEFFREY BRAY	Albuquerque	NM	87114	United States	2025-11-10

Casey Carr	Albuquerque	NM	87112	United States	2025-11-10
Richard Ross	Albuquerque	NM	87111	United States	2025-11-10
Deborah James	Albuquerque	NM	87113	United States	2025-11-10
Arlene Hanson	Albuquerque	NM	87105	United States	2025-11-10
Steve Largo	Albuquerque	NM	87110	United States	2025-11-10
Guy Santo	Albuquerque	NM	87120	United States	2025-11-10
Barbara Johnson	Albuquerque	NM	87120	United States	2025-11-10
Rose Machac	Albuquerque	NM	87122	United States	2025-11-10
Cherene Kryloff	Albuquerque	NM	87110	United States	2025-11-10
Mary Baca	Albuquerque	NM	87109	United States	2025-11-10
Aurora Baca	Albuquerque	NM	87112	United States	2025-11-10
Mike Day	Albuquerque	NM	87102	United States	2025-11-10
TED BROOKER	Albuquerque	NM	87120	United States	2025-11-10
Jackie Leyba	Albuquerque	NM	87107	United States	2025-11-11
Aaron Van Tassle	Albuquerque	NM	87110	United States	2025-11-11
Richard Folks	Albuquerque	NM	87111	United States	2025-11-11
Camille Toubbeh	Albuquerque	NM	87110	United States	2025-11-11
Greg Ramirez	Albuquerque	NM	87120	United States	2025-11-11
tracey Wolfert	Albuquerque	NM	87120	United States	2025-11-11
LARRY LANE	Albuquerque	NM	87110	United States	2025-11-11
Maria Vigil	Albuquerque	NM	87106	United States	2025-11-11
Stephen Montoya	Albuquerque	NM	87111	United States	2025-11-11
Joshua Coleman	Albuquerque	NM	87109	United States	2025-11-11
Anthony Fleg	Albuquerque	NM	87110	United States	2025-11-11
Shannon McKenna	Albuquerque	NM	87110	United States	2025-11-11
Don Meyer	Albuquerque	NM	87122	United States	2025-11-11
Robert Garcia	Albuquerque	NM	87114	United States	2025-11-11
Bianca Encinias	Albuquerque	NM	87104	United States	2025-11-11
Nanci Cariveau	Albuquerque	NM	87109	United States	2025-11-11
Jody Neal-Post, Esq.	Albuquerque	NM	87106	United States	2025-11-11
Jessica Lannon	Albuquerque	NM	87105	United States	2025-11-11
Crystal Garcia	Albuquerque	NM	87102	United States	2025-11-11

Justin Nafzgar	Albuquerque	NM	87123	United States	2025-11-11
Donna Contractor	Albuquerque	NM	87106	United States	2025-11-11
Bernadette Hardy	Albuquerque	NM	87108	United States	2025-11-11
Fay Yao	Albuquerque	NM	87111	United States	2025-11-11
Pablo Gabaldon	Albuquerque	NM	87114	United States	2025-11-11
JoAnn García	Albuquerque	NM	87102	United States	2025-11-11
Linda Good	Albuquerque	NM	87108	United States	2025-11-11
Diane Sarson	Albuquerque	NM	87120	United States	2025-11-11
Jackie McDowell	Albuquerque	NM	87120	United States	2025-11-11
Sandra Diesel	Albuquerque	NM	87111	United States	2025-11-11
Chris Page	Albuquerque	NM	87111	United States	2025-11-11
Franklin Schilling	Albuquerque	NM	87122	United States	2025-11-11
Olivia Mercado	Albuquerque	NM	87102	United States	2025-11-11
Andres Torres	Albuquerque	NM	87102	United States	2025-11-11
Ilyssa gutierrez	Albuquerque	NM	87102	United States	2025-11-11
Caroline LeBlanc	Albuquerque	NM	87198	United States	2025-11-11
Mary Poyer	Albuquerque	NM	87111	United States	2025-11-11
Angela Vigil	Albuquerque	NM	87106	United States	2025-11-11
Sabrina Zamora	Albuquerque	NM	87106	United States	2025-11-11
Kyler Carr	Albuquerque	NM	87108	United States	2025-11-11
Yazh Pending	Albuquerque	NM	87108	United States	2025-11-11
Lillian Estes	Albuquerque	NM	87110	United States	2025-11-11
Nate Judkins	Albuquerque	NM	87114	United States	2025-11-11
Olivia Weinreich	Albuquerque	NM	87106	United States	2025-11-11
Elena Moya	Albuquerque	NM	87110	United States	2025-11-11
Michelle Croteau	Albuquerque	NM	87111	United States	2025-11-11
Jazmin Quintero	Albuquerque	NM	87114	United States	2025-11-11
Maya Key-Towne	Albuquerque	NM	87102	United States	2025-11-12
Mandy Chavez	Albuquerque	NM	87121	United States	2025-11-12
Abigail Ropp	Albuquerque	NM	87106	United States	2025-11-12
Lorenzo Gutierrez	Albuquerque	NM	87108	United States	2025-11-12
Jazmine Rodirguez	Albuquerque	NM	87105	United States	2025-11-12

Nancy Arnaudville	Albuquerque	NM	87112	United States	2025-11-12
Gregory Hardy	Albuquerque	NM	87108	United States	2025-11-12
Susan Grant	Albuquerque	NM	87114	United States	2025-11-12
Tom Martin	Albuquerque	NM	87114	United States	2025-11-12
Carmen Cordova	Albuquerque	NM	87114	United States	2025-11-12
Jeff Rein	Albuquerque	NM	87107	United States	2025-11-12
Kathleen Byle	Albuquerque	NM	87111	United States	2025-11-12
Jennifer Alderete	Albuquerque	NM	87121	United States	2025-11-12
Rochelle Chavez	Albuquerque	NM	87110	United States	2025-11-12
Moneka Stevens	Albuquerque	NM	87121	United States	2025-11-12
Chris Kershner	Albuquerque	NM	87114	United States	2025-11-12
Ash Gray	Albuquerque	NM	87107	United States	2025-11-12
Susan Andrews	Albuquerque	NM	87111	United States	2025-11-12
Darren Mirabal	Albuquerque	NM	87112	United States	2025-11-12
Rachel Moulton	Albuquerque	NM	87109	United States	2025-11-12
Kale King	Albuquerque	NM	87109	United States	2025-11-12
Bettina Wormington	Albuquerque	NM	87110	United States	2025-11-12
Rik Whitaker	Albuquerque	NM	87122	United States	2025-11-12
GUILLERMINA OSORIA CC	Albuquerque	NM	87108	United States	2025-11-12
Serenity Snider	Albuquerque	NM	87110	United States	2025-11-12
Kimberly Robinson	Albuquerque	NM	87114	United States	2025-11-12
Stewart Morris	Albuquerque	NM	87114	United States	2025-11-12
Isabella Chavez	Albuquerque	NM	87113	United States	2025-11-12
Margaret Smith	Albuquerque	NM	87111	United States	2025-11-12
Debra Maese	Albuquerque	NM	87122	United States	2025-11-12
Wayne Frye	Albuquerque	NM	87122	United States	2025-11-12
Sharon Baughman	Albuquerque	NM	87114	United States	2025-11-12
Felix Lucero	Albuquerque	NM	87105	United States	2025-11-12
Janice Orrsak	Albuquerque	NM	87114	United States	2025-11-12
Anna Lee DeSaulniers	Albuquerque	NM	87102	United States	2025-11-12
Valerie Chavez	Albuquerque	NM	87106	United States	2025-11-12
Bonita Dinham	Albuquerque	NM	87111	United States	2025-11-13

Sara Valentine	Albuquerque	NM	87114	United States	2025-11-13
Mary Mcculloch	Albuquerque	NM	87120	United States	2025-11-13
Stephanie Johnson	Albuquerque	NM	87111	United States	2025-11-13
Maria Armstrong	Albuquerque	NM	87120	United States	2025-11-13
Susanna Suddarth	Albuquerque	NM	87114	United States	2025-11-13
Eugene Mullahey	Albuquerque	NM	87120	United States	2025-11-13
Paul Inglat	Albuquerque	NM	87104	United States	2025-11-13
LORNA BRAU	Albuquerque	NM	87106	United States	2025-11-13
Jesus Castro Nava	Albuquerque	NM	87110	United States	2025-11-13
Pauline Donner	Albuquerque	NM	87123	United States	2025-11-13
Cindy Crittenden	Albuquerque	NM	87112	United States	2025-11-13
Srini Vasan	Albuquerque	NM	87123	United States	2025-11-13
Lewis Lefler	Albuquerque	NM	87114	United States	2025-11-13
Veronica Medina	Albuquerque	NM	87110	United States	2025-11-13
Allina Stover	Albuquerque	NM	87112	United States	2025-11-13
Steven McKnight	Albuquerque	NM	87122	United States	2025-11-13
Mark Mezzetti	Albuquerque	NM	87114	United States	2025-11-13
Sandra Mallory	Albuquerque	NM	87110	United States	2025-11-13
Virginia Taylor	Albuquerque	NM	87114	United States	2025-11-13
Michael Caddell	Albuquerque	NM	87112	United States	2025-11-13
Miriam Greenwood	Albuquerque	NM	87107	United States	2025-11-13
Barbara B Clark	Albuquerque	NM	87122	United States	2025-11-13
Jeff Stephens	Albuquerque	NM	87104-2390	United States	2025-11-13
Joan Benvenuti	Albuquerque	NM	87111	United States	2025-11-14
Una Morgan	Albuquerque	NM	87112	United States	2025-11-14
Zack Ramsey	Albuquerque	NM	87120	United States	2025-11-14
Robert Benavidez Sr	Albuquerque	NM	87120	United States	2025-11-14
Lynn Rheins	Albuquerque	NM	87106	United States	2025-11-14
Nona Tebou	Albuquerque	NM	87120	United States	2025-11-14
Tamera English	Albuquerque	NM	87114	United States	2025-11-14
Brian Carr	Albuquerque	NM	87114	United States	2025-11-14
David mckinney	Albuquerque	NM	87120	United States	2025-11-14

brandy mackey	Albuquerque	NM	87114	United States	2025-11-14
Amanda Cortes	Albuquerque	NM	87105	United States	2025-11-14
Sarah Smith	Albuquerque	NM	87106	United States	2025-11-14
Gerald Garcia	Albuquerque	NM	87107	United States	2025-11-14
Diane Nihart	Albuquerque	NM	87112	United States	2025-11-14
Jaemes Shanley	Albuquerque	NM	87106	United States	2025-11-14
Karen Morton	Albuquerque	NM	87114	United States	2025-11-14
Theresa Dunworth	Albuquerque	NM	87104	United States	2025-11-14
John Hooker	Albuquerque	NM	87184	United States	2025-11-14
Mike Voorhees	Albuquerque	NM	87120	United States	2025-11-14
Lynda Easter	Albuquerque	NM	87110	United States	2025-11-14
Julie DelMarcelle	Albuquerque	NM	87110	United States	2025-11-14
Lynn Garner	Albuquerque	NM	87123	United States	2025-11-14
Sarah Rivera-Contreras	Albuquerque	NM	87114	United States	2025-11-14
Michael Venhaus	Albuquerque	NM	87111	United States	2025-11-14
Dave Arambula	Albuquerque	NM	87120	United States	2025-11-15
Sofia Ponce	Albuquerque	NM	87121	United States	2025-11-15
Gerald Wood	Albuquerque	NM	87120	United States	2025-11-15
Mitchell Yan	Albuquerque	NM	87123	United States	2025-11-15
Maggie Anderson	Albuquerque	NM	87104	United States	2025-11-15
John Shoe	Albuquerque	NM	87104	United States	2025-11-15
Nancy Zamora	Albuquerque	NM	87110	United States	2025-11-15
Maria Castillo	Albuquerque	NM	87121	United States	2025-11-15
Lynn Dapo	Albuquerque	NM	87104	United States	2025-11-15
Linda Vath	Albuquerque	NM	87106	United States	2025-11-15
Carla Sanchez	Albuquerque	NM	87108	United States	2025-11-15
Lydia Reed	Albuquerque	NM	87114	United States	2025-11-15
Eleanor Walther	Albuquerque	NM	87114	United States	2025-11-15
Marsha Fredericks	Albuquerque	NM	87114	United States	2025-11-15
Chris Varney	Albuquerque	NM	87110	United States	2025-11-15
Chad Silverstein	Albuquerque	NM	87112	United States	2025-11-15
Consuelo Sanchez	Albuquerque	NM	87109	United States	2025-11-15

Bernadette Cash	Albuquerque	NM	87114	United States	2025-11-15
Charlene Rockwell	Albuquerque	NM	87120	United States	2025-11-15
Jan LaPitz	Albuquerque	NM	87121	United States	2025-11-15
Victoria Maietta	Albuquerque	NM	87102	United States	2025-11-15
Cheryl Gibson	Albuquerque	NM	87110	United States	2025-11-16
John Washburn	Albuquerque	NM	87112	United States	2025-11-16
Katya Voss	Albuquerque	NM	87123	United States	2025-11-16
Joyce Pannell	Albuquerque	NM	87112	United States	2025-11-16
Janise Baldo	Albuquerque	NM	87104	United States	2025-11-16
Lynne Stapp	Albuquerque	NM	87108	United States	2025-11-16
Eileen Hanson	Albuquerque	NM	87113	United States	2025-11-16
June Montano	Albuquerque	NM	87106	United States	2025-11-16
Damion Rinaldi	Albuquerque	NM	87114	United States	2025-11-16
Rebecca Haulenbeek	Albuquerque	NM	87120	United States	2025-11-16
Louisa Sanchez	Albuquerque	NM	87121	United States	2025-11-16
Carol Johnson	Albuquerque	NM	87114	United States	2025-11-16
Mark Young	Albuquerque	NM	87112	United States	2025-11-16
Tabytha Bullock	Albuquerque	NM	87120	United States	2025-11-17
Amanda Marchese	Albuquerque	NM	87102	United States	2025-11-17
Daren Lewid	Albuquerque	NM	87111	United States	2025-11-17
Bob Simpson	Albuquerque	NM	87120	United States	2025-11-17
Janice Yates	Albuquerque	NM	87104	United States	2025-11-17
Paula Metoyer	Albuquerque	NM	87120	United States	2025-11-17
Amy Harris	Albuquerque	NM	87123	United States	2025-11-17
Joseph Gallegos	Albuquerque	NM	87106	United States	2025-11-17
Alicia Chavez	Albuquerque	NM	87102	United States	2025-11-17
Yolanda Vargas	Albuquerque	NM	87105	United States	2025-11-17
Catherine Squire	Albuquerque	NM	87106	United States	2025-11-17
Diana Webb	Albuquerque	NM	87110	United States	2025-11-17
Mercedes Reyes	Albuquerque	NM	87105	United States	2025-11-17
Audrey Garcia	Albuquerque	NM	87121	United States	2025-11-17
Marcia Walton	Albuquerque	NM	87107	United States	2025-11-17

Olivia Jimenez	Albuquerque	NM	87107	United States	2025-11-17
Amelia Pollock	Albuquerque	NM	87106	United States	2025-11-17
Iphigenia Kerfoot	Albuquerque	NM	87123	United States	2025-11-17
Peggy Norton	Albuquerque	NM	87107	United States	2025-11-17
Angelica Sandoval	Albuquerque	NM	87114	United States	2025-11-17

Date: November 18, 2025

To: Environmental Planning Commission
Re: Project #: PR-2018-001843
Plan #: TA-2025-00002
48-hour comment Number 2

Chair Aragon and Commissioners:

Here's another issue that presents a major unintended consequence: the potential rise in property tax!

By State law, our residential property tax increase is limited to 3% per year, with exceptions listed below.

NM Stat § 7-36-21.2 (2024)

A. Residential property shall be valued at its current and correct value in accordance with the provisions of the Property Tax Code; provided that for the 2001 and subsequent tax years, the value of a property in any tax year shall not exceed the higher of one hundred three percent of the value in the tax year prior to the tax year in which the property is being valued or one hundred six and one-tenth percent of the value in the tax year two years prior to the tax year in which the property is being valued. This limitation on increases in value does not apply to:

- (1) a residential property in the first tax year that it is valued for property taxation purposes;
- (2) any physical improvements, except for solar energy system installations, made to the property during the year immediately prior to the tax year or omitted in a prior tax year; or
- (3) valuation of a residential property in any tax year in which:
 - (a) a change of ownership of the property occurred in the year immediately prior to the tax year for which the value of the property for property taxation purposes is being determined; or
 - (b) the use or zoning of the property has changed in the year prior to the tax year.

As stated in my previous 48-hour comment, two of the 150 proposed amendments—Items #ZC-3 and #ZC-4—will permissively change the zoning on potentially thousands of properties, **with no notification to or permission of** those property owners.

My intent in crafting the 2023 amendment to Sec. 6-3(D) ANNUAL UPDATES TO THE IDO—to change the update schedule from annual to biennial—was two-fold. First, to allow Council to alternate with the Budget process, and second, to allow time for more careful thought and crafting of truly necessary changes (and to give volunteers who review it all a breather). **It was not to create an avenue for twice as much spaghetti to be thrown at the wall...**

Respectfully,

Patricia Willson
Albuquerque resident since 1972

Date: November 18, 2025

To: Environmental Planning Commission Re: Project #: PR-2018-001843

Plan #: TA-2025-00002 48-hour comment Number 2

Chair Aragon and Commissioners:

I want to call to your attention that under New Mexico statute, the cap on raising residential property taxes to no more than 3% per year does not apply when the zoning of the property has changed in the prior year.

This is likely not a bug, but a feature of the proposal, which will impact long-term homeowners in predominately under-represented or disadvantaged populations, often on a fixed income, who will see their property taxes suddenly jump to current market rate valuations driven by both the exemption of the 3% cap and the influx of speculative private equity investors. This will place a huge burden on those homeowners, many of whom will be forced to sell.

That will give hedge funds the opportunity to erase historic neighborhoods and replace them with vast rental complexes and extended stay facilities to keep the working poor poor.

But even affluent neighborhoods where changes to the zoning are forced through will see their property taxes rise by thousands of dollars per year.

Since this is a state law, the City cannot forestall its effect, other than by not doing it.

NM Stat § 7-36-21.2 (2024)

“This limitation on increases in value does not apply to:

(3) valuation of a residential property in any tax year in which:

(b) the use or zoning of the property has changed in the year prior to the tax year.”

Sincerely,
Mike T. Voorhees
Albuquerque Resident



PRESIDENT & CHAIRMAN
OMNIGLOBAL MATRYOSHKA, LLC

November 18, 2025

An Open Letter
To the
Environmental Planning Commission

Dear Chairman Aragon and Commissioners,

Let's face it: Aspen, Telluride, and even Durango are played out. Gone are the halcyon days of speculating on the low hanging fruit of resort properties. Even my Pacific Rim contemporaries have found that Vancouver and Sydney are no longer the steal that they once were. What is a billionaire to do? We all know that one-time Burqueños Bill Gates and Jeff Bezos went elsewhere to seek their fortunes. But we now have an opportunity before us to mine the wealth of Albuquerque's best untapped resource...its inhabitants! It is called the IDO amendments.

If we seize the day, we can rid the city of its pesky zoning restrictions and obstructive environmental protections in one fell swoop! By converting their precious R-1 zoning into an anything-goes, free-market build-a-palooza, I can line up syndicated real estate instruments to buy out those antiquated properties and transform this sleepy town into an investors' paradise, converting the working poor into a permanent rental class cash cow at the same time. This confusing hodgepodge of 151 arcane changes before the holidays is the perfect venue to catch the populace unawares.

I realize that some may see such a scheme as risky, but I assure you my surrogates have paved the way with platitudes and disinformation, couching this whole endeavor as a plan to improve affordability. The irony is wickedly delightful, I know. A few well-placed endowments and funding those libertarian think-tanks has produced a bounty of fallacious studies that would make climate change deniers blush. And by coopting progressive terminology and buzz words, we even have the plebeians doing our dirty work going after the "NIMBYS". If any of the whippersnappers asks why you are supporting this, just say "six seven." They'll be back to scrolling on TikTok in no time.

But I digress. Money does not launder itself, and the pace of new car washes, self storage facilities, and rental complexes is simply not keeping pace with demand. While we all know that a hobbled IRS cannot possibly audit these properties, my accountants says we must still keep books within the range of at least vaguely plausible. My South American associates are particularly concerned, as recreational cigar boating has taken too many hits and raised too much scrutiny, if you get my drift.

But if we play our cards right now, we can change the city's existing housing into fungible investment vehicles attractive to both sovereign wealth funds and my more shadowy associates. Remember, a rising tide raises all super-yachts. But to do this, it is up you. Vote yes to the entire package of 151 IDO amendments and I'm sure there will be gratuities enough for all who play ball, wink, wink.

Huzzah, etc...etc...

Milburn Pennybags III

Date: November 18, 2025

To: Environmental Planning Commission
Re: Project #: PR-2018-001843
Plan #: TA-2025-00002
48-hour comment

Chair Aragon and Commissioners:

It has become common parlance and practice in the context of our recent national politics to describe a strategy of effecting dramatic transformative policy and administrative change at “muzzle velocity”. This is often enabled by asserting hypothesis as incontrovertible fact, ascribing causality by vilification, and maintaining rigid willful ignorance of the obvious.

In many ways that describes the volume and potential impact on Albuquerque of the current round of IDO amendments. To some, it promises to Make Albuquerque Great Again, while to others it appears to threaten irreversible destabilization of an aspect of our urban community that is singularly and visibly not broken.

What is indisputable is that we are being presented via bureaucratic mandate with a set of zoning guidelines with potential to alter the character of our city while effectively sidestepping the two salient and “in your face” crises of street homelessness and commercial collapse along most of our major corridors.

There is undoubtedly a crisis of housing affordability for both rent and purchase among more than half of city wage earners. Yet, nothing in the proposed amendments will mitigate the underlying driver of housing inflation which is urban land Rent. Increasing density on R-1 lots has been shown throughout the English-speaking world to accelerate inflation of housing costs.

Residential property in Albuquerque has an assessed value for tax purposes of \$14.19 billion. All non-residential property is valued at \$4.22 billion. In a financialized world where an ever-expanding pool of investment capital is relentlessly driven to “consume” assets, it is incredibly naïve to believe and assert that re-zoning efforts to make the largest asset class in the State more attractive to private equity investment will not occur.

These measures also ignore NM statute § 7-36-21.2 (2024) which specifically lifts the 3% cap on property tax increases in cases where “(b) the use or zoning of the property has changed in the year prior to the tax year.”

The consequences of this process are too great for it to be conducted outside the purview or understanding of the vast body of residents whom it will affect. I urge consideration of a comprehensive public information campaign to ensure this does not become another case of city government pulling a “fast one” on its constituents.

Sincerely,

Jaemes Shanley
Resident Mark Twain Neighborhood



November 17, 2025

Environmental Planning Commission
c/o Mr. Daniel Aragon, Chair
600 2nd Street NW
Albuquerque, NM 87102

SUBJECT: NAIOP New Mexico Response to the 2025 Environmental Planning Commission Integrated Development Revisions

Dear Environmental Planning Commissioners,

Thank you for your service on the Environmental Planning Commission and for your diligent review of the proposed IDO updates. In light of your October 28th discussion and our own thorough analysis of the 2025 amendments, we are providing our remaining concerns about specific proposals that we believe may unintentionally limit Albuquerque's ability to grow, reinvest, and thrive.

We are in support of EPC's recommendations on all other proposed amendments that are not outlined below.

1. Oppose
 - a. New Change to Neighborhood Edges
 - i. This new amendment should not be recommended for Council approval. This change directly counters the City's intent to provide higher density housing along our key centers and corridors. For example, East Downtown, a key area of potential redevelopment, would be severely limited in the amount of density allowed due to the zoning configuration of single-family homes abutting commercially zoned tracts. This would prevent a significant portion of a commercial lot from being redeveloped over 30 feet in height. This same condition would apply in Nob Hill, where existing height restrictions have already dampened density opportunities along the City's most important walkable corridor. This proposed amendment should be denied and not recommended for Council approval.
 - b. Item #7: Historic Protection Overlay Zones – Frontages – 3-5
 - i. Albuquerque has many older buildings, many of which are historic and should be preserved, and others that are just old and need to be demolished. This provision allows for unilateral discretion for the Planning Department to designate a property as historic, even if it's not necessarily historic. The HPO's are already in place to protect historic buildings in our key historic districts around Albuquerque. We do not

NAIOP New Mexico 2025

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James Hernandez - Nusenda

Justin Horwitz - Rodey Law

Tom Jenkins - Real Estate Advisors

Adam Leyba - Kilinger

Wade Messenger - Pulte Group

Sal Perdomo - Titan Development

Alex Pulliam - NAI SunVista

Sherry Read - Century Bank

Brandon Remley - REDW

Elisha Saavedra-Torres - PNM

Darin Sand - Goodman Real Estate

David Shaffer - AIC General Contractor

Joesph Sierra - Century Bank

David Silva - Legacy Development

Dennis Towne - Bradbury Stamm

Oscar Urias - Bridgers & Paxton

Rebecca Velarde - Palindrome

need additional historic protections piecemealed around the City for small portions of certain sites. This just puts additional burden on property owners trying to revitalize their property and buildings. This change should not be approved.

- c. Item #34: Cumulative Impacts – Requirements – 5-2(E)(2)(c)
 - i. This adds another layer of paperwork to an already burdensome entitlement and permitting process. Traffic Scoping Forms are required in accordance with the requirements in the DPM. The DPM requirements are enforced for a reason and the zoning code should not counteract these requirements in an effort to add more paperwork, time, and burden to the entitlement and permitting process. This change should not be approved.
- d. Item #40: Parking Maximums in UC-AC-MS-PT-MT – 5-5
 - i. We are supportive of all changes within Item #36, #37, and #40, except for the provision reducing Parking Maximums for non-residential development within Centers & Corridors. The Parking Maximums for non-residential development is significantly low and could hamper potential investment along the City’s important corridors. The market should dictate the amount of parking needed, within reason, and the stated maximum should remain at 175% and this specific change should be reverted back to the original.
- e. Item #99 to 107: Landscaping Changes
 - i. Generally, NAIOP is opposed to Items #99 to 107 as they add additional cost, unnecessary oversight, and/or complexity to landscape design process. With that said, NAIOP supports Items #102 and 105 as they allow for easier execution of strong landscape design.
- f. Item #63: Demolition Outside of an HPO – 6-6(B)(1)
 - i. This change should not be approved. Albuquerque already has an image problem with several old buildings that are falling apart due to lack of maintenance. The City should not make it more challenging to demolish an old building. Just because a building is old, does not mean it is historic. The State has processes and procedures in place to identify a building as historic already, the IDO does not need to counter this.

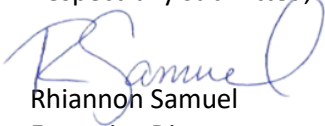
2. Revision Still Needed:

- a. Item #93: Infrastructure Improvement Agreement (IIA)
 - i. Recommended change to revised text to read as follows: *The Applicant provide an IIA for all required infrastructure conforming to the approved Site Plan, pursuant to Subsection 14-16-6-4(P)* . There is mention of IIA **and construction plans and specifications**. Construction plans and specifications are not required at this time which could cause some confusion. Section 6-4(P)(2) notes “...the applicate shall provide an IIA based on the required infrastructure.... “. Removing mention of **construction plans and specifications** makes this statement more consistent.
- b. Item #94: Subdivision – Major Preliminary Plat/Final Plat
 - i. Revision proposed to the following sections for consistency and clarity.

1. Section 5-4(N)(1) “....Required improvements shall be installed and constructed as specified in an Infrastructure Improvements Agreement (IIA) between the subdivider and the City....” There is currently mention of improvements shall be installed and constructed as **shown on an approved plat**. There are no specific improvements shown on plats.
2. Section 6-4(P)(3) – Remove the following sentence “Before a Plat may be signed off as final, the applicant shall present construction plans and specifications for all required infrastructure (which shall conform to the approved Plat) to the city Engineer.” **Infrastructure Plans and specifications are not required to be presented to the City Engineer to obtain Plat final sign off.** This statement should be removed for clarity or requirement of Final Plat sign off.
3. Section 6-9(B)(7) – Remove Section 6-9(B)(7)(a) in its entirety. **Grading occurs regularly and at the city’s knowledge prior to plat approval with an Approved drainage plan or report.** This requirement was remnant from past IDO and should be clarified with this amendment for clarity purposes.

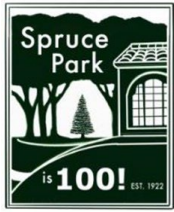
Thank you for your leadership and for considering NAIOP’s recommendations. We appreciate your thoughtful review of our concerns and your commitment to ensuring the IDO supports Albuquerque’s continued growth and reinvestment.

Respectfully submitted,



Rhiannon Samuel
Executive Director
NAIOP New Mexico

CC: Adam Silverman, NAIOP New Mexico, Board President
Sal Perdomo, NAIOP New Mexico, Chair of the Governing Affairs Committee



Spruce Park Neighborhood Association
1603 Sigma Chi Road, NE
Albuquerque, NM 87106

November 18, 2025

Dear Chairman Aragón and EPC Commissioners:

In agreement with recent presentations made by the CABQ Planning Department, Spruce Park Neighborhood Association supports the policies of the Comprehensive Plan that preserve the distinctiveness of individual neighborhoods. We agree that the blandness brought by one-size-fits-all development should be avoided. Our community is an important contributor to the cultural heritage of Albuquerque, and as such should be protected from the irreparable damage that would come from some of the currently proposed amendments to the Integrated Development Ordinance.

Spruce Park neighborhood has two recognized historic areas. Spruce Park Historic District, listed on the National Register of Historic Places and the New Mexico Register of Cultural Properties, is over 100 years old. Many homes here are irreplaceable, reprising designs that represent early European architecture. The companion Sigma Chi Road Historic District exemplifies the popular styles of the 1950s. Yet, despite these designations, we are unlike other historic areas of the city in that we have no protective overlay. We already also have unusually high residential density without the city-wide increases proposed by the IDO amendments. Forty percent of our dwelling units are multifamily. We are in no way comparable to other parts of the city where more recently built housing has exclusively been single family and is on larger lots connected by wider streets.

Maintaining the homes in Spruce Park is an expensive labor of love. However, the extreme upzoning proposed for us would make this foolish because property values would shift entirely to the land, targeting the structures for demolition. We are a small neighborhood that would, because of our location adjacent to the west side of the main UNM campus, be especially attractive to investors seeking maximum profit from rentals to students. The unrestricted height limits of additional apartment projects would be particularly detrimental, as would the parking reductions granted to the seventy percent of our land that is within ¼ mile of the A. R. T. line. Private vehicles are still needed for such activities as medical appointments and grocery shopping, and parking a large number of them on our narrow, curving streets would not be possible. Some lots here are less than fifty feet wide, with 13-foot-wide driveway cuts; hence, normal services like trash collection and emergency responses could not function. All the proposed options (cottage developments on 10,000 square foot lots [if there are any], two-family duplexes, and/or townhouses [the latter with unlimited numbers of units]) would be highly damaging. Adding so-called tienditas, restaurants, and other businesses would only increase destructive congestion here; the services they would provide are already within walking distance. We strongly oppose the M2 conversion of R-1 zoning in the corridor along the A. R. T. line to R-T.

In accordance with instructions pertaining to the amendment process that are written in the IDO, which state that it will comply with the directive of the Comp Plan to preserve heritage areas (like Spruce Park), we ask that you add an amendment to preserve the existing character of neighborhoods that are recognized historical entities. Please also see our companion letter for comments regarding other problematic aspects of the IDO update process that need remedies.

Sincerely,

Heidi Brown, President

Spruce Park Neighborhood Association



Spruce Park Neighborhood Association
1603 Sigma Chi Road, NE
Albuquerque, NM 87106

November 18, 2025

Dear Chairman Aragón and EPC Commissioners:

Please see our companion letter regarding objections to current Integrated Development Ordinance amendments that will be especially detrimental to our neighborhood, Spruce Park, and to others like us. The first letter mentions some of the problems that will result here from non-compliance with the vision of the Comprehensive Plan that would prevent cookie cutter development throughout Albuquerque, but it should not be seen as a complete list of our concerns. We urge the enactment of fundamental reforms to the process that will make it easier for civic-minded residents to participate and preserve the livability of neighborhoods.

Respect the vision of the Comp Plan. Although the IDO amendment guidelines state that the process will follow the directive to preserve the city's cultural heritage and neighborhood diversity, a path of seemingly infinite residential densification is being pursued. Spruce Park neighborhood, listed on national and state registers of significant historical places, merits such protection but these changes make it financially unwise to maintain the homes. Because of our close proximity to the main UNM campus and the A. R. T. line that runs along Central Ave, we are especially vulnerable to being overwhelmed.

Limit the number of amendments and follow standard notification procedures. With the introduction of 150 changes in this update, careful analysis of all the detrimental impacts is impossible. The revisions cannot be understood by average persons because the legalese in which they are written requires professional knowledge. Since zoning regulations remained relatively stable until the 2018 implementation of the IDO, residents have come to expect that the neighborhoods around their homes will remain as they are into the foreseeable future. If home owners have any awareness of zoning, they imagine it generally sustains that environment, and they are ill-prepared to grasp the individual implications of the more than 700 amendments that have been created since 2018. Nor have the notification requirements posted on the EPC website for less impactful projects been adhered to in this case.

Avoid social injustice by respecting constituent property rights. In general, the proposed residential densifications would decrease the quality of life in neighborhoods because control of land use would shift from residents who are primarily motivated by the desire to create a pleasant environment to profit-driven owners. Major densifications of residential zoning encourage development of large-scale apartment buildings by corporate investors who can be expected to remove lower priced starter homes from the market in order to increase profits. A permanent social class of perpetual renters emerges, and this decreases the opportunity to build generational wealth. There are no inherent requirements that the new apartments will be affordable over the short or long term. With population declines in Albuquerque that are predicted to continue through 2029, the ending year of the projection, the need for the extreme densifications is questionable.

Follow a schedule that allows careful consideration of impacts. The approvals/modifications during the various phases of the current process are too rushed to allow consideration of their unintended consequences. The issues are complex and should be presented during the Community Planning Area assessments or similar community meetings. Some decision-making authorities do not appear to be concerned about whether the impacts will seriously harm neighborhoods and individual lives. This is not a philosophical discussion pertaining to vacant land.

Listen sooner. Allowing constituents only a minute or two in public hearings to express concerns that should have been considered in detail previously is inappropriate.

Thank you for your consideration of these issues.

Heidi Brown, President

Spruce Park Neighborhood Association



November 17, 2025

Mr. Daniel Aragon
Chair of the Environmental Planning Commission
600 2nd Street NW
Albuquerque, NM 87102

RE: Response to Proposed 2025 IDO Amendments

Dear Members of the Environmental Planning Commission:

Thank you for your service on the Environmental Planning Commission and for your work to review and vet the proposed IDO Changes. After careful review of the 2025 IDO Update proposed changes and EPC's review of these changes on October 28th, 2025, we have outlined our remaining concerns to certain changes with rationale as to why these changes are detrimental to the growth and vitality of Albuquerque.

We are in support of EPC's recommendations on all other proposed amendments that are not outlined below.

1. New Change to Neighborhood Edges
 - a. This new amendment should not be recommended for Council approval. This change directly counters the City's intent to provide higher density housing along our key centers and corridors. For example, East Downtown, a key area of potential redevelopment, would be severely limited in the amount of density allowed due to the zoning configuration of single-family homes abutting commercially zoned tracts. This would prevent a significant portion of a commercial lot from being redeveloped over 30 feet in height. This same condition would apply in Nob Hill, where existing height restrictions have already dampened density opportunities along the City's most important walkable corridor. This proposed amendment should be denied and not recommended for Council approval.
2. Item #7: Historic Protection Overlay Zones – Frontages – 3-5
 - a. Albuquerque has many older buildings, many of which are historic and should be preserved, and others that are just old and need to be demolished. This provision allows for unilateral discretion for the Planning Department to designate a property as historic, even if it's not necessarily historic. The HPO's are already in place to protect historic buildings in our key historic districts around Albuquerque. We do not need additional historic protections piecemealed around the City for small portions of certain sites. This just puts additional burden on property owners trying to revitalize their property and buildings. This change should not be approved.
3. Item #34: Cumulative Impacts – Requirements – 5-2(E)(2)(c)

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- a. This adds another layer of paperwork to an already burdensome entitlement and permitting process. Traffic Scoping Forms are required in accordance with the requirements in the DPM. The DPM requirements are enforced for a reason and the zoning code should not counteract these requirements in an effort to add more paperwork, time, and burden to the entitlement and permitting process. This change should not be approved.
4. Item #40: Parking Maximums in UC-AC-MS-PT-MT – 5-5
 - a. We are supportive of all changes within Item #36, #37, and #40, except for the provision reducing Parking Maximums for non-residential development within Centers & Corridors. The Parking Maximums for non-residential development is significantly low and could hamper potential investment along the City's important corridors. The market should dictate the amount of parking needed, within reason, and the stated maximum should remain at 175% and this specific change should be reverted back to the original.
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 - a. This change should not be approved. Albuquerque already has an image problem with several old buildings that are falling apart due to lack of maintenance. The City should not make it more challenging to demolish an old building. Just because a building is old, does not mean it is historic. The State has processes and procedures in place to identify a building as historic already, the IDO does not need to counter this.

Thank you for taking the time to review our concerns and we look forward to discussing these changes at the upcoming EPC hearing.

Sincerely,



Josh Rogers, Partner

CC: Ian Robertson, Director, Titan Development
Sal Perdomo, Vice President, Titan Development

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