



P.O. Box 66288  
 Albuquerque NM 87193-6288

April 12, 2017

Karen Hudson, Chair  
 Environmental Planning Commission  
 Sent via email

**RE: Integrated Development Ordinance  
 Specific Revisions**

Dear Chair Hudson and Members of the EPC:

We offer the following detailed revisions for you to consider for the IDO.

Notes:

1. Those items in black (with red underline to show suggested revisions) follow from the TRNA Board approved letter of April 4, 2017.
2. Those items in purple (with red underline to show suggested revisions) are currently under review of the TRNA Board.

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Page in IDO (Dec. 2016)	Section of IDO	General Subject	Actual proposed text change (shown in red and underlined)  Note: Comments shown in purple are still under review of the TRNA Board.	Reason for change/or request for some type of change
p. 99	2.7.4	View Protection Overlay Zone	A. Purpose: The purpose of the VPO district is to preserve areas with unique and distinctive views <u>and to have buildings in the foreground blend with the view of the natural features that are worthy of conservation.</u> <u>View Preservations Overlays must meet the standards of Major Public Open Space.</u>	The Coors Corridor Plan and the Westside Strategic Plan promote policy that would protect the views and require buildings to blend with the natural environment.

			<p>B. Regulations Applicable to Specific Areas.</p> <p>1. Coors Boulevard Corridor – VPO-1</p> <p>a. Applicable Area Standards apply in the mapped area shown below. Where the boundary crosses a lot line, the entire lot is subject to the VPO-1 standards and guidelines.  <u>Review of Site plans for subdivision and building permit by the EPC is required.</u></p> <p>.....</p> <p>b. Views protected by this VPO are from Coors Boulevard, along the segment between Western Trail/NamasteRoad and Alameda Boulevard, looking toward the Rio Grande Bosque and the Sandia Mountains.  <u>c. Structures built in this area shall predominantly use the browns and greens of the Bosque.</u></p>	
<p>p.99</p>	<p>2-7.4.c</p>	<p>Definitions (Coors VPO)</p>		<p>Recommend that the actual definitions be brought into this section (and that the regulatory definitions not be separated, in the back of the IDO). Supportive of Pat Gallagher suggested modifications to graphics on p. 393</p>

				to properly illustrate view frames and sight lines.
p. 101	2-7.4.D	Deviations (VPO)	Administrative deviations from View Protection Overlays are not allowed. Variations from these standards are only available pursuant to Section 4-16-5.2.K (Development Standard Variance), which requires a public hearing <u>before the EPC. The applicant is required to demonstrate that the deviation provides either greater civic benefit or greater natural benefit than the standard.</u>	Brings forward the provisions from the Coors Corridor Plan.
p. 110	3-2	Permissive Use Table -Motor Vehicle-related permissive uses – Light vehicle repair		Remove light vehicle repair as a permissive use in the MX-L zone.
p. 111	3-2	Permitted Use Table Offices and Services.	<u>Indoor</u> Self Storage	Need to make new designations for self storage accessed from the outside. There is a much more impact if the storage is outdoor than indoor.
p. 112	3-2	Permitted Use Table- Retail Sales- Adult Retail		Remove adult retail as a permitted use in NR-C zone. The Westside of Abq should not be the more open to adult retail than the east side.
p. 113	3-2	General Retail, small medium large		Support the square footages as shown.
p.148	3-3.6.D	Drive throughs	4. The service window ... <u>5. The order board shall be less than xx square feet.</u>	Order boards can create a great amount of visual clutter.
p.148	3-3.6.D	Drive throughs	<del>5-6</del> This use is prohibited in the following mapped areas, as noted below. <u>This use is also prohibited</u>	Drive throughs conflict with environmental

			<u>within 330 feet of Major Public Open Space.</u>	values and animal activities in MPOS.
p.169	Table 4-1-2	Summary of Max density/intensity	MX-L <del>30-20</del> du/acre MX-M <del>75-40</del> du/acre	Densities were increased 100-400% from existing zones.
p. 171	Tables 4-1-3	Summary of NR Zone District Dimensional Standards	Max. building height NR-C Other Areas: <del>65-35</del> ft.	Height increase was over 200 percent of existing zone.
p. 177	4-2.5.E.2.a	Fences and Walls Residential	Opaque walls <u>with at least 20% view fencing</u> are <del>only</del> -permitted along arroyo edges with lots in Residential zone districts.	View fencing has been used abutting many arroyos on the Westside to improve the negative look of a solid wall.
p. 181	4-2.8	Properties Abutting Major Public Open Space	Properties <u>Abutting-Within 330 feet of</u> Major Public Open Space. These standards and guidelines apply to development <u>abutting within 330 feet of the</u> Major Public Open Space to enhance the development and protect the Major Public Open Space. <u>If any portion of the parcel is within 330 feet of MPOS, the entire parcel is subject to the MPOS standards.</u>	A transition is needed adjacent to MPOS to make sure environmental values are preserved.
p. 181	4-2.8	Properties Abutting Major Public Open Space	4. Have a 6 foot maximum height for fences and walls in Residential and Mixed-use districts along the Major Public Open Space, constructed of natural or earth tone colors. <u>View fencing atop of base of 3 feet is encouraged.</u>	The wall or fence is an important design transition from the MPOS.
p. 187	4-3	Access and Connectivity		Need to bring provisions of the LRF forward that require LRF larger than xx to have primary access to an arterial street.
p. 187	3.3.C.1.a	Driveways and access general	Every lot shall have sufficient access to afford a reasonable means of ingress ....for those needing to access the property for its intended use.	Vague. Driveway limitations should be tied to the street's functional classification, i.e,

				principal arterial (fewest driveways, etc.)
p.217	5.E.2	Parking Maximums	In areas of the City outside the Downtown, Urban Center, and Main Street areas, additional parking up to 10 percent over the maximum parking requirement may be approved by the Planning Director if the Planning Director determines that additional surface parking may be necessary due to unusual site or use characteristics.... <u>Providing additional parking adjacent to entry points to major public open space qualifies as an unusual use characteristic.</u>	Parking is often limited near MPOS. Extra public parking is needed. Sagebrush Church near Coors/LaOrilla built over parking required, but signed some of that parking as 'public' to accommodate this public entrance to the Bosque.
p. 230	5.9.B	Drive Throughs Stacking Lane Design		Add criteria to reduce the visual clutter of menu boards.
p. 250	6.9.B	Wall Maximum Height	Residential wall height	Is residential wall height maximum 8 feet? That height is very tall for residential to residential walls.
p. 254	6.9.4.a	Wall materials		Rework: Combination of wall materials is problem in existing areas where people haphazardly raise wall heights with a different material than the original wall.
p.255	6.9.4.b	Wall materials		Barbed wire/razor wire is allowed in most non residential areas. Allowing barbed wire in NR-C is a problem.
p. 255	6.9.4.c	Wall materials		Chain link fencing allowed in

				residential districts? Confusing: two uses of 'except' in same sentence.
p. 255	6.9.8	Bicycle access	"shall provide access points in walls....to the maximum extent practicable."	How will "maximum extent practicable" be applied?
p. 269	4-10.5A	Building Facades	Downtown, Urban Center, <u>Activity Center</u> , and Premium Transit <u>and Major Transit</u> areas	Enhanced pedestrian level amenities are needed in more areas of the City. Building façade and articulation standards are important parts of the IDO.
p. 271	4.10.6.b. 2.a & d	Seating and Gathering Areas	a. Each required seating and gathering area shall be at least 40 square feet in size for each <del>60,000</del> <u>50,000</u> square feet of gross floor area;.... d. The seating and gathering area shall be linked to the main entrance of the principal structure and the public sidewalk or internal driveway <u>or adjacent to or with views to public or private open space.</u>	Enhance outdoor seating in more areas. Near Public Open Space is consistent with WSSP.
p. 305	5-2.9.D.3	EPC Membership	In making the recommendation, the Mayor shall attempt to appoint members with experience in <u>neighborhood or</u> community planning, architecture, landscape architecture, urban design, real estate development, transportation, <u>civil engineering</u> and/or real estate finance. <u>The Mayor shall attempt to promote a balance of member backgrounds to create a balanced perspective.</u>	Worthy candidates to the EPC may come from more backgrounds than those listed.
p. 310	5.4.3.A	Neighborhood Meeting	,,,the applicant shall have at least one meeting with <del>a-any</del> <u>Recognized Neighborhood Association</u> <u>Associations</u> (RNA) whose boundaries include the project	Current facilitated meetings are most effective when applicant has project details for

			before filing the application. <u>Seven days prior to the meeting, the applicant shall provide the RNAs with the analysis of avoidance of sensitive areas. The applicant should make every attempt to also provide the scope of uses with general square footages, general site layout, design guidelines, architectural style and/or conceptual elevations, and conceptual landscaping.</u>	neighbors to review.
p.323	5.4.20.A	Finality of Decisions	A decision on a matter by any entity shown in Table 5-1-1 is final unless appealed, in which case it is not final until the appeal has been decided by the last appeal body.	Problem as applied to declaratory rulings which citizens may be unaware of or new circumstances present.
p. 324	5.4.21.B. 1.c	Who may appeal?	An RNA <del>whose boundaries include located partially or completely within one-quarter (1/4) miles of the subject property that can demonstrate the showing of impact required by subsection 2 below;</del> or	RNA should maintain current standing rights and no increased burden of justification
p. 337	5-5.1.F	Site Plan – Administrative Threshold	1. Applicability... b. All new civic, institutional, commercial, or industrial development with less than <del>100,000</del> <u>75,000</u> square feet of gross floor area.	
p. 363	5-5.3.B	Amendment to Zoning Map – EPC Threshold	a. That would amend the Zoning Map to change less than 10 gross acres of land <del>located wholly or partially in an Area of Consistency, (as shown in the adopted Comprehensive Plan), or less than 20 gross acres of land in a zone district located entirely in an Area of Change (as shown in the</del>	Council should be the final authority for all rezonings greater than 10 acres.

			<del>adopted Comprehensive Plan</del> to a different zone district:	
p. 364	5-5.3.B.3 and other similar places	R270-1980	A different <del>zone district</del> <u>use category</u> is more <del>consistent with the</del> <u>advantageous to the community, as articulated</u> Comprehensive Plan <del>than the current zone category or other City master plan even though (1) and (2) above do not apply.</del>	Need to preserve the language of R270-1980 which is based in state law.

We express deep appreciation to the Planning Department for their skilled and tireless work in managing this project. We appreciate the work of the EPC to review the IDO and all the community input. Any one section of the IDO could take a City a year to produce and review. Doing all these sections at once, with a zoning conversion map, show take as much time as need to avoid unintentional consequences for the City or the public.

Sincerely,

Jolene Wolfley, Director  
 Government Affairs  
 Taylor Ranch N.A.