



Spruce Park Neighborhood Association  
1300 Las Lomas Rd NE  
Albuquerque NM 87106

---

January 8, 2023

Timothy MacEachen, Chairman  
Environmental Planning Commission  
City of Albuquerque

Dear Chairman MacEachen,

The Spruce Park Neighborhood Association (SPNA) *requests that quantitative bounds be placed* on the City's proposal to allow duplexes and backyard apartments in all single-family zones, so that the City can meet its commitment to the Albuquerque/Bernalillo County (ABC) Comprehensive Plan.

The ABC Comprehensive Plan is the "... Rank 1 Master Plan for both Albuquerque and Bernalillo County" (Section 1.3) and the Plan is a vision of the future where "Areas of Consistency . . . will experience limited new development. Change that does occur will reinforce or enhance the existing character of those neighborhoods" (page 5-4). Additionally there are two policy goals that are important to the Spruce Park Neighborhood: (1) Policy 5.6.3 "Areas of Consistency: *Protect and enhance the character of existing single-family neighborhoods ...*" and (2) Goal 11.2 Historic Assets "Preserve and enhance significant historic districts and buildings to reflect our past ..."

The majority of the Spruce Park Neighborhood is a Historic District that is listed on the State and National Register. In addition to its historic significance, our neighborhood is located across the street from UNM's main campus – and parking has long been an important issue in our neighborhood. Additionally, investors have already purchased a significant number of our homes and converted them to student rentals, exacerbating the parking issues.

The SPNA supports the broad goals of the City's Housing Forward initiative to increase the density of dwelling units; though two of the proposed changes to the Integrated Development Ordinance (IDO) are of concern. The first is allowing single-family dwellings to be converted to two-family dwellings (duplexes) in R-1 zones and the second is allowing the construction of backyard apartments (accessory dwelling units or ADUs) in R-1 zones.

If these two proposed changes to the IDO are instituted, then investors can purchase single-family homes, modify the homes to become duplexes, and then rent 2 dwelling units. Build an ADU in the backyard and the investor could legally rent 3 dwelling units on a single lot. Based on our experiences, two dwelling units will bring five to six vehicles, and three dwelling units will bring six to nine vehicles to a single lot.

The two photographs at the end of this letter speak clearly to the existing parking issues. There is not enough parking for the increased densities that the proposed changes will bring. To allow so many parked cars will destroy the character of existing single-family neighborhoods.

Simply put - *the City cannot allow the unbridled construction of ADUs and the conversion of single family homes to duplexes, while honoring the ABC Comprehensive Plan goal to: "Protect and enhance the character of existing single-family neighborhoods ..."* (5.6.3).

That said, *with boundaries*, the City could increase the density of dwelling units through changes to the IDO and still meet the goals of the ABC Comprehensive Plan. Let us propose two boundaries to be implemented through conditional approvals: first, the applicant must demonstrate that adequate parking can be provided for the anticipated number of residents and second, that no more than 25% of the homes on a block can have an ADU or be a duplex conversion. So that there are eyes on the process (and so we don't have to rely on after-the-fact zoning enforcement), we request that these limits be implemented through conditional approvals. Importantly, we believe that these proposed boundaries will protect older neighborhoods while rarely constraining city-wide increases in the density of dwelling units in R-1 zones.

On behalf of the Board,



John Cochran

President

Spruce Park Neighborhood Association

Cc: Representative Pat Davis, District 6, CABQ  
Representative Gail Chasey [gail@gailchasey.com](mailto:gail@gailchasey.com)  
Senator Ortiz y Pino [jortizyp@msn.com](mailto:jortizyp@msn.com)  
District 6 Coalition



Many of the lots in older neighborhoods are too narrow for a driveway, a 3 ft. free sight triangle and 2 vehicles at the curb



There is inadequate parking for even 4 vehicles per lot in much of the Spruce Park Neighborhood