

August 29, 2025

Environmental Planning Commission
City of Albuquerque
600 2nd St NW
Albuquerque, NM 87102

RE: Justification Letter for an EPC Application – Discount Towing project located at 4000 2nd Street NW, Albuquerque, NM

Dear Environmental Planning Commission Members,

Community Design Solutions, LLC (CDS), on behalf of J&M Discount Towing, LLC, respectfully submits this project justification letter in support of an EPC Site Plan application, in accordance with Section 6-6(I) of the Integrated Development Ordinance (IDO).

The subject site is currently an operating towing and light vehicle repair facility located within the NR-LM (Non-Residential – Light Manufacturing) zone, which permits such uses. The applicant proposes to construct a new 12,900 square foot shop building on the existing site to expand operations and improve service efficiency. This investment represents continued economic development and reinvestment within an established industrial corridor.

The proposed development requires Site Plan EPC review pursuant to IDO Section 6-6(I)(1)(c)5 due to its location within the Railroad and Spur Small Area and the requirement for a cumulative impact analysis.

Below is a detailed response to the applicable IDO Review and Decision Criteria:

6-6(I)(3)(a) – Consistency with the ABC Comp Plan, as amended

Response:

The site is located within an *Area of Change* as identified in the ABC Comp Plan (2024), which encourages targeted investment and redevelopment. The property is also within 1,320 feet (1/4 mile) of the *4th Street Main Street Corridor*, where the Plan supports higher-intensity employment and service uses, infill development, and business expansion.

The proposal aligns with the following Comp Plan policies:

- **Policy 5.1.1 – Centers & Corridors:** Supports intensifying employment uses near identified corridors.
- **Policy 5.3.1 – Infill Development:** Encourages efficient use of underutilized land by supporting development where urban infrastructure is already in place.
- **Policy 5.6.2 – Areas of Change:** Encourages infill development, economic investment, and service access in Areas of Change.

This expansion project directly supports those policies by enhancing employment capacity, leveraging existing infrastructure, and promoting reinvestment in an underutilized industrial site.

6-6(I)(3)(b) – Consistency with previously approved NR-SU or PD zoning

Response:

Not applicable. The property is not zoned NR-SU or PD, and there are no prior development agreements affecting the site.

6-6(I)(3)(c) – Compliance with applicable regulations

Response:

The proposed development complies with all relevant provisions of the IDO, the DPM, and other applicable City regulations. Detailed compliance will be verified through staff review prior to building permit issuance.

6-6(I)(3)(d) – Infrastructure capacity and mitigation

Response:

Existing infrastructure is generally adequate to serve the site. Any required mitigation has been addressed through a recorded Infrastructure Improvements Agreement (City Project No. 601382), executed as part of platting action PR-2021-005714, which consolidated the lots prior to this Site Plan application.

6-6(I)(3)(e) – Mitigation of adverse impacts

Response:

The project will not result in significant adverse impacts to the site or the surrounding area. The proposed expansion continues the existing use without intensifying traffic, noise, or visual character beyond what is typical in an NR-LM zone.

6-6(I)(3)(f) – Consistency with Master Development Plan (if applicable)

Response:

Not applicable. The site is not located within an approved Master Development Plan.

6-6(I)(3)(g) – Cumulative impact mitigation in the Railroad and Spur Small Area

Response:

The proposed development will not create material adverse cumulative impacts on water quality, traffic, parking, noise, vibration, or light. The project expands an existing low-impact industrial use, and any impacts identified through staff review will be mitigated to the maximum extent practicable in coordination with the City, consistent with IDO Section 14-16-6-4(H).

6-6(I)(3)(h) – Outdoor or site lighting performance analysis

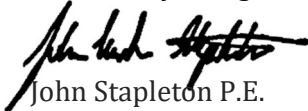
Response:

If a lighting performance analysis is required, the proposed lighting design will comply with Section 14-16-5-2(E) and ensure that no adverse effects occur on neighboring properties or uses.

We appreciate your consideration of this application and look forward to contributing to continued reinvestment along the 2nd Street corridor. Please contact us if any additional information is needed.

Sincerely,

Community Design Solutions, LLC



John Stapleton P.E.

CDS | Project Manager
505-545-9607