



**Environmental
Planning
Commission**

*Agenda Number: 2
Project Number: 1001620
Case #: 12EPC-40056
October 11, 2012*

Staff Report

Agent	City of Albuquerque Planning Department
Applicant	City of Albuquerque
Request	Text Amendments to the Comprehensive Zoning Code
Legal Description	§14-16-1-5 §14-16-2-6(A) §14-16-3-4
Location	City-wide

Staff Recommendation

That a recommendation of DENIAL of 12-EPC-40056, as written, be forwarded to the City Council, based on the Findings on page #, and subject to the Conditions of Approval on page #.

Staff Planner
Maryellen Hennessy, Senior Planner

Summary of Analysis

This request, initiated by the City Council, is for text amendments to the above listed sections of the Code of Ordinances. The Environmental Planning Commission (EPC)'s role is to make a recommendation to City Council.

The intention of the proposed legislation is to address the issue of residential properties being used for short-term vacation rental purposes (a term of less than 30 days), thereby changing the character of the R-1 zone. The rental of residential properties for short-term use by tourist or business travelers is an increasingly growing segment of the tourism industry. New technology has facilitated a growing economic niche for this activity. Vacation rental operations are becoming more visible in the community and there have been reported problems related to noise and increased traffic.

Zoning Code enforcement, in consultation with the City's Legal Department, has concluded that the Comprehensive Zoning Code as it exists is ambiguous on the issue of short-term rental activities. The proposed amendments are intended to clarify what constitutes a short-term rental use and to severely limit the use of single-family residential properties for this purpose.

Limiting short-term rental use in the manner proposed in the amendments might have unintended consequences related to economic development and tourism. Staff has also identified aspects of the proposed text amendments that need clarification; they are discussed in this report. The proposed legislation also raises questions of enforcement.

This request was announced in the Neighborhood News, e-mailed to neighborhood representatives and advertised on the EPC agenda as published in the newspaper. Staff concludes that affected parties are most likely not aware that the legislation is being considered and recommends additional public notice.

Staff recommends that the issue be studied further and that alternative approaches be considered. Staff recommends that a recommendation of denial of the amendments, as written, be forwarded to the City Council.

City Departments and other interested agencies reviewed this application from 9/4/2012 to 9/14/2012. Agency comments used in the preparation of this report begin on Page 13.

I. INTRODUCTION

Request

This is a request to amend the text of the Comprehensive Zoning Code. An amendment to §14-16-1-5, the Definitions section, would add a definition for short-term vacation rentals:

[VACATION RENTAL, SHORT-TERM. The rental of a house or any portion thereof for a period of less than 30 consecutive days. A rental for purposes of this definition involves money, or other consideration given in return for occupancy, possession or use of the house.]

An amendment to §14-16-2-6(A), the Permissive Use section for the R-1 zone, would add short-term vacation rentals as a permissive use while limiting such use:

[Vacation Rental, Short Term. A site may be used as a short-term vacation rental two times within any calendar year.]

Finally, an amendment to §14-16-3-4, the Non-conforming Use Regulations, would provide a grace period for such a non-conforming uses:

[A house that is non-conforming because of its use as a short-term vacation rental shall be brought into conformance within three years after becoming non-conforming.]

The proposed text amendments would apply citywide. The request is legislative in nature.

History

The proposed amendments were introduced to the City Council as Bill O-12-26 on August 6, 2012. The bill was referred to the Environmental Planning Commission for their consideration on August 8, 2012.

Context and Intent

As provided in the *Comprehensive Zoning Code*, the R-1 Zone provides suitable sites for houses and uses incidental thereto in the Established and Central Urban areas. Other residential zones including the R-LT (houses/townhouses), R-T (houses/townhouses), R-G (houses/townhouses/low density apartments), R-2 (houses/townhouses/medium density apartments), R-3 (high density housing) and RC (residential commercial) would be affected by the amendments as all of these residential zones reference the R-1 zone permissive uses. SU2 residential zones as designated in most of the neighborhood Sector Development Plans would also be affected as those zones also refer to the R-1, R-2 and R-3 zones. The proposed amendments would affect most residential zones across the city.

The intention of the proposed legislation is to address the issue of residential properties being used for short-term rental purposes (a term of less than 30 days), thereby changing the character of the R-1 zone.

The rental of residential properties for short-term use by tourist or business travelers is an increasingly growing segment of the tourism industry. While renting apartments, houses, and cottages on the short term to travelers is a centuries old tradition, new technology has facilitated a growing economic niche for this activity. In today's market, multiple websites support the advertisement and the booking of short-term rental properties. Vacation rental operations are becoming more visible to the communities that host them, especially in the United States. Short-term rental of residential properties can be considered a thriving "cottage industry".

For travelers, short-term, or vacation rentals, offer an alternative to traditional hotel or bed and breakfast accommodations. They are often more affordable, offer more amenities and can accommodate families or more guests than a traditional hotel room. Guests can economize by preparing their own meals on site. Travelers also report that they add a more "authentic" experience to their visit.

Many cities have found that their zoning ordinances do not anticipate this type of land use. In response, some cities are attempting to regulate, limit and sometimes prohibit this activity, which can, in some circumstances, affect traditional residential neighborhoods. Regulation is typically attempted in highly popular tourist destinations where residential neighborhoods can be overwhelmed by a transient population of visitors and where housing markets are being inflated by second homes and investment properties that are rented short term.

Some cities are ignoring the issue that some residents or property owners rent out homes for a very short term, considering this practice to be the prerogative of the property owner. Others reason that this economic activity is, in effect, an unfair business practice. Some would argue that people who offer their privately owned home or apartment for short term rentals are in fact functioning as hotels, but they are not paying the same lodgers tax as required of the hotels, nor are they subject to the same fire and safety standards and inspections as hotels.

Other problems sometimes associated with this type of activity are related to noise and parking. Bill O-12-26, as introduced, cites increased traffic, noise, high occupant turnover, and density in single-family residential neighborhoods as concerns addressed by the legislation. It also states that the number of occupants in such temporary rentals has the potential to exceed standards for the design capacity of such structures and to cause health and safety problems. Reports of loud, late night parties conducted by occupants with no ties to the community and no concern for the rights of adjoining property owners are also cited as reasons why the legislation limiting this use is needed.

Environmental Planning Commission (EPC) Role

The EPC is a recommending body with review authority. The EPC's task is to make a recommendation to the City Council regarding the proposed text amendments. The City Council is the City's Zoning Authority and will make the final decision.

II. ANALYSIS OF APPLICABLE ORDINANCES, PLANS AND POLICIES

Note: Policy citations are in regular text; *Staff analysis is in bold italics.*

Charter of the City of Albuquerque

The Citizens of Albuquerque adopted the City Charter in 1971. Applicable articles include:

Article I, Incorporation and Powers

“The municipal corporation now existing and known as the City of Albuquerque shall remain and continue to be a body corporate and may exercise all legislative powers and perform all functions not expressly denied by general law or charter. Unless otherwise provided in this Charter, the power of the city to legislate is permissive and not mandatory. If the city does not legislate, it may nevertheless act in the manner provided by law. *The purpose of this Charter is to provide for maximum local self-government.* A liberal construction shall be given to the powers granted by this Charter.” (emphasis added)

Article IX, Environmental Protection

“The Council (City Commission) in the interest of the public in general shall protect and preserve environmental features such as water, air and other natural endowments, ensure the proper use and development of land, and promote and maintain an aesthetic and humane urban environment. To affect these ends the Council shall take whatever action is necessary and shall enact ordinances and shall establish appropriate Commissions, Boards or Committees with jurisdiction, authority and staff sufficient to effectively administer city policy in this area.”

The City Charter provides the City the authority to revise, modify and enforce legislation in the interest of the public. The proposed amendments to the Zoning Code are an exercise in self-government (City Charter Article 1). Adding a new provision to the list of ordinances governing land uses generally is an attempt by the Council to ensure the proper use and development of land, and to promote and maintain a humane urban environment. Modifying sections of the Zoning Code allows the City to more effectively administer city policy, however; the proposed text amendments, as written, lack clarity and may be difficult to enforce.

Albuquerque Comprehensive Zoning Code

Authority and Purpose (summarized): The Zoning Code is Article 16 within Chapter 14 of the Revised Code of Ordinances of Albuquerque, New Mexico, 1994 (often cited as ROA 1994). The administration and enforcement of the Zoning Code is within the City’s general police power authority for the purposes of promoting the health, safety, and general welfare of the public. As such, the Zoning Code is a regulatory instrument for controlling land use activities for general public benefit.

Amendment Process (summarized): The City Council is the zoning authority for the City of Albuquerque and has sole authority to amend the Zoning Code. Through the City Charter, the City Council has delegated broad planning and zoning authorities to the Environmental Planning

Commission (EPC). The EPC is advisory to the City Council regarding proposed text amendments to the Zoning Code.

Zoning Code enforcement, in consultation with the City's Legal Department, has concluded that the Comprehensive Zoning Code as it exists is ambiguous on the issue of short-term rental activities. Code enforcement has been unable to respond to complaints related to this use of property. The proposed amendments are intended to clarify what constitutes a short-term rental use and to severely limit the use of single-family residential properties for this purpose.

The proposed new language lacks clarity and would be difficult to enforce as analyzed in Section III below.

Albuquerque/Bernalillo County Comprehensive Plan

The Comprehensive Plan, the Rank I planning document for the City, contains goals and policies that provide a framework for development and service provision. The Plan's goals and policies serve as a means to evaluate development proposals and requests for text amendments such as this. Applicable goals and policies include:

Land Use

Section II.B.5, Developing and Established Urban Areas, Goal: The Goal is "to create a quality urban environment, which perpetuates the tradition of identifiable, individual but integrated communities within the metropolitan area and which offers variety and maximum choice in housing, transportation, work areas, and life style, while creating a visually pleasing built environment."

Establishing short term or vacation rentals as a permissive land use furthers the Developing and Established Urban Area goal of offering "variety and maximum choice in housing, transportation, work areas and life styles, while creating a visually pleasing built environment." Short-term rental units are located in existing residential dwellings that are typical of the neighborhoods where they are located. The use provides economic flexibility for property owners. The stipulation that properties may only conduct this use on a very limited basis counteracts that flexibility and may not further the Developing and Established Urban Area Goal.

Environmental Protection and Heritage Conservation

Section II.4, Noise, Goal: The Goal is to protect the public health and welfare and enhance the quality of life by reducing noise and by preventing new land use/noise conflicts.

The proposed legislation cites noise and reports of loud, late night parties as reasons why the legislation is needed. While it is understandable that some tenants, while on "vacation", might be inclined to cross respectable boundaries and create a nuisance for neighbors, there are other Public Nuisance laws that address such issues. The police can be contacted to mitigate a disturbance of the peace. If short-term rentals were permitted but regulated, nuisances might be addressed through the regulations.

Community Resource Management

Section II.D.6 Economic Development Goal: The goal is to achieve steady and diversified economic development balanced with other important social, cultural and environmental goals.

Policy D states “Tourism shall be promoted”.

There has been no documented effort to understand how many properties in the City are being used for short-term vacation rental purposes, or to understand the economic circumstances that motivate property owners to conduct this activity. Consideration should be given to the potential impact of the proposed legislation on the property owners and the community.

A cursory internet search conducted by staff shows forty-eight (48) properties in Albuquerque offered for short term rental to tourist and business travelers on the popular web-site homeaway.com and ninety-eight (98) properties are offered on VRBO.com (Vacation Rental by Owner). (See attachment). These are two of many related web sites that advertise vacation rental properties. (See attachment). The types of properties range from large three to five bedroom houses to newly developed loft apartments, studios and detached dwelling units or “casitas.” Neighborhoods in the City identified in the advertisements include the Sandia foothills; Nob Hill, Downtown, the North Valley and several properties are in the Old Town area.

Adoption of the text amendment as written could have the unintended consequence of penalizing property owners who may be renting their properties short term for reasons related to economic survival. There are a variety of circumstances that could make this use more economically viable than traditional, longer-term rental for some property owners.

The amendments make no distinction between short-term rentals that are owner-occupied and those that are not. For example, a house may have an attached apartment or detached casita that is rented short term for supplemental income while the owner lives on site. An owner occupied vacation rental would most likely be less subject to nuisance problems such as those cited in the legislation.

The text amendment as written, although it presumes to make short-term vacation rental a permissive use, limits that use to two occasions per year. This restriction would “de facto” eliminate most vacation rental properties. Limiting rentals to twice a year would render non-owner occupied short-term rental properties economically unviable.

The elimination of short-term vacation rentals citywide could have the unintended consequence of negatively affecting our tourism industry. Vacation rentals are now part of the mainstream travel economy and residential rentals are an increasingly popular choice for both business and pleasure travelers. Potential visitors to our city might be inclined to choose another destination where they can access their preferred choice of lodging.

An alternative approach to prohibition that is being taken by many cities is to regulate short-term rental uses by providing for registration subject to various controls. In locations where the pressure is greatest to convert needed housing to transient lodging, limits on the number of permits issued in a particular geographic area is often stipulated. In addition, occupancy

standards can be enforced and fire safety standards are enforced by inspections. In many cities, owners are required to collect lodging taxes, which benefit the city directly. (See attachment).

As written, the proposed text amendments do not support the Economic Development Goal, and in particular Policy d.

III. ANALYSIS- PROPOSED TEXT AMENDMENTS

New language is [+underlined and bracketed+]. Deleted language is [underlined, bracketed and struck through]. Planning Staff's explanation is in ***Bolded Italics***.

§14-16-1-5, the Definitions section, add a definition of short-term vacation rentals:

[VACATION RENTAL, SHORT-TERM. The rental of a house or any portion thereof for a period of less than 30 consecutive days. A rental for purposes of this definition involves money, or other consideration given in return for occupancy, possession or use of the house.]

The Zoning Code defines HOUSE as "A single-family, detached dwelling unit; a building containing only one dwelling unit." As written, the use would be permitted (albeit it in a very limited way) in houses and any detached dwelling unit in the R-1 or R-1 referenced zones.

The definition as written does not include townhouses or other multi-unit residential buildings. It is not known if other types of dwelling units were intentionally excluded. There is some ambiguity to this. The proposed language could be interpreted to mean that only houses that are rented short term are to be considered Short Term Vacation Rentals, or it could be interpreted to mean that townhouses, apartments and condominiums may not participate in this use at all.

The definition as written specifically states that not only does money need to be exchanged for use of the house, but also it includes "other consideration" as indicative of short-term rental activity. This may be an overly broad definition. For example, a homeowner who likes to travel and may participate in house exchanges more than twice a year would be prohibited from doing so as the exchange of the property could be considered "other consideration." The intention of the legislation is not clear with regard to what might constitute "other consideration".

Staff concludes that the definition, as written, is ambiguous and would recommend a definition that includes all dwelling units: VACATION RENTAL, SHORT TERM. A single family house, condo, apartment or similar dwelling that is rented to tourists and business travelers for periods of less than 30 days, for at least a portion of each year.

§14-16-2-6(A)(10) Permissive Use section for the R-1 zone, adds short-term vacation rentals as a permissive use as number 10 and re-number accordingly.

[Vacation Rental, Short Term. A site may be used as a short-term vacation rental two times within any calendar year.]

This amendment references a “site” rather than a “house” as stated in the proposed definition above. The Zoning Code defines a SITE (PREMISES) as “Any lot or combination of contiguous lots held in single ownership, together with the development thereon; there may be multiple occupancy.” There is inconsistency and ambiguity between the proposed new definition and the new permissive use language. The intention of the legislation should be clarified.

As noted in above analysis, although the amendment would add Short Term Vacation Rental as a permissive use, limiting such use to twice a year effectively eliminates such activity for most economic purposes. The amendment, as written, makes no distinction regarding length of time a house is rented. A single weekend would constitute a rental event with the same impact as 29 days.

Zoning Enforcement comments note that, as written, it is unclear how this regulation would be enforced. It would be difficult if not impossible for Zoning Code Enforcement to monitor the frequency of short-term rental activity as contemplated in the new language.

§14-16-3-4, Non-conforming Use Regulations, add a new exception

[A house that is non-conforming because of its use as a short-term vacation rental shall be brought into conformance within three years after becoming non-conforming.]

This is a proposed amendment to Section 14-16-3-4 (Nonconforming Structures & Uses). There are amendments to Section 14-16-3-4 being considered concurrently with this request. Any new language to this section will need to be coordinated accordingly with other amendments to the Nonconforming Structures and Use sections of the Code that may be adopted.

The Heading on the legislation, O-12-26, refers to an “amortization” period. The City’s legal department advises staff that the term “amortization” should not be used in this circumstance, as there are unintended legal implications associated with that term. The title of the bill should be restated in a more neutral manner, such as allowing for a grace period to allow owners to make other plans for their properties or to perform on any contractual obligations they might have.

The text might be clarified by stating that properties shall be brought into conformance within three years of the effective date of the Short Term Vacation Rental Ordinance.

IV. OTHER ISSUES

Family Day Care Homes, Home Occupations and Community Care Facilities are uses that are permissive in the R-1 subject to conditions. Short term Vacation Rental might be considered similar to these other permitted uses and could be regulated to mitigate potential land use conflicts in a similar manner.

A task force could be established to review and recommend policies regarding short-term vacation rentals, similar to the task force that was established by the Council to consider the issue of electronic signs in the City.

V. CONCERNS OF REVIEWING AGENCIES / PRE-HEARING DISCUSSION

City and other interested agencies reviewed this application from 9/4/2012 to 9/14/2012. Zoning Enforcement comments that, as written, it is unclear how the proposed regulation would be enforced.

VI. NEIGHBORHOOD/PUBLIC CONCERNS

The proposed text amendments were announced in the Office of Neighborhood Coordination's Neighborhood Newsletter and legally noticed in the newspaper in the EPC agenda for hearing.

There are no other legal requirements for notification of affected or interested parties and no further notifications were provided. Staff has not received any communications from interested parties. It is likely that persons affected by the proposed legislation are not aware that this legislation is being considered. Staff recommends that the public be made aware of this proposed legislation by whatever means possible, which might include an article in the newspaper or on television.

VII. CONCLUSION

A well-designed vacation rental law recognizes the value of short term or vacation rentals in the community and the property rights of owners, and attempts to balance those values and rights with other community concerns and issues. A poorly designed law minimizes the value of vacation rentals to the community, may infringe upon the property rights of owners, and is often written to address problems that are documented primarily by hearsay and may be difficult or impossible to enforce.

Staff concludes that the proposed text amendments, as written, are ambiguous and will be difficult to enforce. If the intention of the City Council is to severely limit the use of residential property for short-term rental within the city limits, the amendments should be restated to clarify the intention, although enforcement will remain a problem.

Staff recommends that short-term vacation rental be included as a permissive use in residential zones, but that a system of business registration be implemented that includes stipulated limitations related to nuisance, safety regulation and possibly the payment of lodgers tax if required by law. Crafting of such a short term vacation rental ordinance will require coordination

between Council staff and the Planning Department including Zoning Code Enforcement and Building and Safety Divisions as well as the City's Legal Department.

Staff also concludes that potential opponents or other persons affected by the proposed legislation are most likely not aware that this legislation is being considered. Staff further recommends that the public be made aware of this proposed legislation by whatever means possible, which might include an article in the newspaper or on television.

Based on the ambiguities in the proposed text, the potential conflict with the Economic Development Goal and the overall weakness in public awareness, staff recommends denial of the amendments as written.

FINDINGS – 12EPC-40056 – October 11, 2012 – Amendments to the Zoning Code

1. This is a request by City Council to amend the text in Sections 14-16-1-5, 14-16-2-6(A) and 14-16-3-4 of the Zoning Code to provide a definition of Short-Term Vacation Rental, to add Short-Term Vacation Rental as a permissive use within the R-1 zone with limitations, and finally, to add a new section to the non-conforming use regulations to allow for a three-year grace period for compliance with the new regulations.
2. The request was introduced by the City Council on August 6, 2012 as Bill No. O-12-26 and forwarded to the Environmental Planning Commission for recommendation. The EPC's role is to make a recommendation to the City Council regarding the proposed text amendments. The City Council is the City's Zoning Authority and will make the final decision on the amendments.
3. The intent of the legislation is to address the issue of homeowners using their homes for short-term rental purposes and changing the character of the R-1 zone.
4. The Revised Code of Ordinances of Albuquerque, New Mexico, 1994, including the Zoning Code, is incorporated herein by reference and made part of the record for all purposes.
5. Intent of the City Charter: Revising a portion of the Zoning code is an exercise in local self-government (City Charter Article 1). Adding a new definition to the list of ordinances governing land uses generally expresses the Council's desire to ensure the proper use and development of land, and promote and maintain a humane urban environment (City Charter Article IX). However, as analyzed in the staff report, the proposed text amendments are not specific enough to achieve this result.
6. Intent of the Zoning Code (§14-16-1-3): The proposed text amendments are intended to further the Zoning Code goal of promoting the health, safety and welfare of the citizens, however; the proposed amendments will be difficult to enforce.
7. The request does not further applicable Comprehensive Plan Goals:
 - a. Developing and Established Urban Areas, Goal II.B.5: Establishing short term or vacation rentals as a permissive land use furthers the Developing and Established Urban Area goal of offering "variety and maximum choice in housing, transportation, work areas and life styles, while creating a visually pleasing built environment." Short-term rental units are located in existing residential dwellings that are typical of the neighborhoods where they are located. The use provides economic flexibility for property owners. The stipulation that properties

may only conduct this use on a very limited basis counteracts that flexibility does not further the Developing and Established Urban Area Goal.

- b. Economic Development Goal Section II.D.6: The text amendment as written, although it presumes to make short-term vacation rental a permissive use, limits that use to two occasions per year. This restriction would “de facto” eliminate most vacation rental properties. The elimination of short-term vacation rentals citywide could have the unintended consequence of negatively affecting our tourism industry.
8. The proposed amendment to §14-16-1-5, adding a definition of a short-term vacation rental, refers to the rental of a house or any portion thereof. The proposed definition does not include townhouses or other multi-unit residential buildings. As written, the definition may not be clearly interpreted and may not address all potential dwelling units that might be used for short-term vacation rental.
9. The proposed amendment to §14-16-2-6(A)(10) adding a permissive use in the R-1 Zone refers to a “site” rather than a “house” as referenced in the definition. There may be inconsistency and ambiguity between the proposed new definition and the proposed new permissive use language.
10. The proposed text amendments were announced in the Office of Neighborhood Coordination’s Neighborhood Newsletter and legally noticed in the newspaper in the EPC agenda for hearing. There are no other legal requirements for notification of affected or interested parties and no further notifications were provided. It is likely that persons affected by the proposed legislation are not aware that this legislation is being considered. Efforts should be made to notify interested parties of the proposed legislation.

RECOMMENDATION - (12-EPC-40056) (OCTOBER 11, 2012)

That a Recommendation of DENIAL of case #12-EPC-40056, to amend the text of the Comprehensive Zoning Code, be forwarded to the City Council, based on the preceding Findings.

***Maryellen Hennessy
Senior Planner***

Notice of Decision cc list:

City of Albuquerque, City Council, Attn: Laura Mason, P O Box 1293, Albuquerque NM 87102

Attachments

1. Council bill O-12-26 and cover memo
2. City of Albuquerque Lodger's Tax Ordinance
3. City of Santa Fe Short Term Rental Ordinance
4. 9/24/2012 Internet searches of Albuquerque properties listed on vrbo.com
5. 9/24/2012 Internet search of Albuquerque properties listed on homeaway.com
6. List of 20 Vacation Rental websites
7. Article from Santa Fe New Mexican 3/20/11 re short term rentals
8. Article from Taos News 3/22/2012 re Vacation Rental: Taxes and Trends
9. Article from Santa Fe Reporter 8/19/2009 re: Vacation Rentals and Enforcement

CITY OF ALBUQUERQUE AGENCY COMMENTS

PLANNING DEPARTMENT

Zoning Enforcement

It is unclear how the proposed legislation is to be enforced.

Office of Neighborhood Coordination

Long Range Planning

CITY ENGINEER

Transportation Development Services

Traffic Engineering Operations

Hydrology

DEPARTMENT OF MUNICIPAL DEVELOPMENT

Transportation Planning

WATER UTILITY AUTHORITY

Utility Services

ENVIRONMENTAL HEALTH DEPARTMENT

Air Quality Division

Environmental Services Division

PARKS AND RECREATION

Planning and Design

Open Space Division

POLICE DEPARTMENT/PLANNING

SOLID WASTE MANAGEMENT DEPARTMENT

Refuse Division

Approved as long as there is compliance with SWMD Ordinance.

FIRE DEPARTMENT/PLANNING

TRANSIT DEPARTMENT

COMMENTS FROM OTHER AGENCIES

BERNALILLO COUNTY

ALBUQUERQUE METROPOLITAN ARROYO FLOOD CONTROL AUTHORITY

ALBUQUERQUE PUBLIC SCHOOLS

MID-REGION COUNCIL OF GOVERNMENTS

MIDDLE RIO GRANDE CONSERVANCY DISTRICT

PUBLIC SERVICE COMPANY OF NEW MEXICO