

OnePlacitas Review of Placitas Area Plan Draft of January 2009

We of OnePlacitas very much appreciate the work that has gone into the production of this draft document, both by the staff of the County Development Department and the members of the Planning and Zoning Commission, and the extent to which they have listened to the goals and concerns of our community. The following recommendations for revisions and additions to the Area Plan are respectfully intended to make the Area Plan a policy document that can practically achieve the goals of our community and of Sandoval County. In this review we have concentrated mainly on matters that will make a substantial difference, such that the policy wording in the Area Plan will result in enforceable regulations to become part of the Zoning Ordinances. Some of these involve modification to the present statements in the draft, others involve recommendations for inclusion of material that we believe has been omitted.

Page 5 – There is a mention of “capital improvements recommendations”, but none specifically appear in the document. There is only mention later of possible improvements to wastewater systems in the Village. As this is a major purpose of producing an area plan, there should be more discussion of these specifics.

Page 11 – The last sentence reads, “Despite the various development histories in the plan area, today it is referred to as the Placitas Area of Sandoval County.” The word “despite” is judgmental as regards the unity of the Placitas Area, suggesting that there is something arbitrary or even misguided about that designation. It would be better to replace this sentence with something more neutral, such as, “Today the area as a whole is referred to as the Placitas Area of Sandoval County.”

Page 12 – The first sentence correctly states that the established Village of Placitas was primarily a Hispanic community, but gives the impression that this is the beginning of human inhabitation of the area, which in fact extends back far before the 18th century, when it was occupied by Native American communities. It might be better to just write, “The Village of Placitas was established in 1765.”

Page 13 – The last sentence refers to a decline of the Hispanic population in Placitas. Ethnic composition is not germane to an area plan focusing on land use, and therefore the sentence should be eliminated.

Page 17, paragraph 2 – To better represent the road situation in Placitas and present standards, we recommend that the first two sentences in this paragraph be replaced by:

The area’s roadway system consists of improved and paved roads maintained by the County, such as Camino de Las Huertas and Paseo De San Antonio in the Village. There are also both paved and unpaved roads in the subdivisions. Subdivision roads built after 1996 had to be built to County standards in order to receive County maintenance. There are a number of paved subdivision roads which were built prior to 1996 and do not conform to present County standards. Many of these roads, such as Overlook Drive, have been grandfathered in and are maintained by the County. In line with County policy, if there is an intent to add to the existing subdivision or another subdivision is planned which would utilize the same access to the main arterial servicing the subdivision, the substandard road would have to be brought up to County Standards.

Page 17, paragraph 2, last sentence - This sentence in this paragraph does not adequately state the situation regarding the I-25/US 550 Interchange. We suggest it be replaced by:

NMDOT issued a Request for Proposals for design for replacement of the interchange in December of 2008. The design period will be approximately two years including the environmental clearance. Construction, pending funding, is scheduled for the 2011 time frame with completion in approximately two years.

Page 22 – The discussion in paragraph 1 of the County encouraging shared wells and community water systems may not be appropriate in the Existing Conditions section of the document. But if mentioned there, then this needs to be followed up later in the Area Plan with recommendations for how this goal will be achieved, through regulations and/or incentives.

Page 24 – There is mention of the 2 parcels of BLM land within the designated Placitas Planning Area, but no mention here of the large, over 3000 acre BLM parcel to its north. We feel that this is a major and troubling omission. The Sandia Wilderness is mentioned and later described, though it also does not lie within the Planning Area. Many members of the Placitas community expressed great concern over the future of the 3000 acre parcel and the impact its future development or lack of development will have on the community. Among the major concerns are threats to health and the environment from prospective mineral extraction and drilling activity, the impact upon wildlife activity in that area, and the potential loss of low impact recreational opportunities for the public. We consider it an unacceptable omission for the County to fail to express any position in the Area Plan over the future of that parcel, given these clear and highly significant impacts. Certainly the BLM would be very receptive to the County's views on these matters, so such recommendations within the Area Plan would be fully appropriate. See comments below regarding page 61 for statements we recommend be added to the plan.

Page 27, last sentence – We suggest that this sentence be replaced with the following:

During the preparation of this plan residents, supported by the New Mexico Wilderness Alliance's research with the NMDOT, the BLM, and the Western Governors Council on Wildlife Corridors, have urged the county to further support studies and current practices to mitigate development and enhance natural movements of keynote species of wildlife through the Placitas Planning Area.

Page 28, 2nd paragraph, last sentence – We suggest this sentence be replaced with the following:

During the Public Comment of the planning phase more than 300 residents urged the BLM to give the over 3,000 acres along the northern boundary of Placitas a designation of Area of Critical Ecological Concern (ACEC). This would help to preserve the Wildlife Corridors between the Sandia and Jemez mountains, and maintain the low impact recreational opportunities the BLM presently provides to the public.

Page 34 – Just to point out a small formatting error, in the second numbered point there is a run on sentence on the third line. It seems that the word "Placitas" should be followed by a period, then "Commercial development pattern" should begin a third numbered point.

Page 37 - The description of formal subdivisions in western Placitas overstates their uniformity and degree of architectural control. It should instead indicate that "typical" lot size varies from the 3/4 acre RRA minimum up to 4 acres, depending in part on subdivision covenants. Also, it should say that covenants may allow guest houses, etc. and may restrict architectural styles, but do not necessarily do so, and that there is more variation in architectural styles, colors, etc. than the present description suggests.

Pages 37, 43 – References to particular subdivisions can be misleading and could be taken to imply that those not mentioned may not be equally parts of Placitas. In any such instance, the text should either refer to "all subdivisions" or to "all formal subdivisions", or to matters "typical" of formal subdivisions in the western part of Placitas.

Page 39 – As the note indicates, the staff is still working on the summary of the goals. We strongly recommend that these not be only what the Placitas community has stated its goals to be, but rather what the present Area Plan, as a statement of County policy, considers the goals to be. For each goal there should then be a matching recommendation in Section 3 of the Plan as to how that goal will be achieved.

Page 40, paragraph 1 – The last sentence begins with the phrase "If these goals for plan implementation are adopted into the plan". This is confusing, since the document is the plan. As noted above in regards to page 39, no goal should be stated in the plan that does not have a matching recommendation. It is better

that the last sentence just read, “Future zoning regulations will be amended to best meet these recommendations.”

Page 40, 2nd bullet - Neither "potential negative development impacts" nor measures to mitigate them are discussed in the draft. Leaving this unspecified leaves the Area Plan too open to misinterpretation.

Page 40 – An additional bullet point should be added to mandate improvement of access roads to new developments be brought up to present County standards. This was mentioned above in the note regarding page 17, paragraph 2.

Page 41 and forward – We agree on the division of the Placitas Area into the six community districts for the purpose of the Area Plan, though possibly the I-25 frontage road would constitute a seventh district (see note at the end). However it is important not to give the impression that these are six distinct areas, that just happen to share the name “Placitas”. We notice that a number of recommendations are shared for all the individual residential districts (excluding perhaps the Diamond Tail district), such as the height limit, and also for all the individual commercial districts. In order to emphasize the essential unity of Placitas we therefore suggest that recommendations common to all the residential and all the commercial districts be placed in the General Plan Recommendations, which should be moved from page 58 to immediately after page 41 and its accompanying map. Recommendations for the six districts should then follow this, and should mention only where these differ from the general recommendations for residential and commercial districts.

Page 43, 2nd bullet – For the West Placitas Residential District (WPRD) the permissive use of agricultural activities is inappropriate. There was some question within our group as to whether some of the other permissive and conditional uses were appropriate for the WPRD, so this might merit further discussion. Our main concern is that if allowed in a WPRD subdivision some of the present conditional uses, such as recreational facilities, would destructively conflict with the character of this portion of Placitas, and could be exploited as loopholes to that end. This bullet might therefore better read “Permissive and conditional uses similar to those allowed in the existing RRA Zoning District, but with appropriate revisions.”

Pages 44, 48, 50 and 54 – We feel that a 24 foot height limit would be more appropriate for Placitas than the proposed 28 foot limit, both for residential and commercial buildings.

Pages 43, 44 and elsewhere – We recommend that the expression “southwestern vernacular” be given some definition, due to the variety found in the various subdivisions in Placitas, which might not be acceptable if “southwestern vernacular” is defined too narrowly.

Page 44 – We recommend adding a bullet calling for required underground utilities for new subdivisions.

Page 58 – The bullet on Night Sky Protection references the Jemez Valley Area Plan. However the specific language is found instead in the Zoning Ordinances for the Jemez Valley. This language should be quoted in the Placitas Area Plan, instead of quoting the state Night Sky Protection Act. Or if the recommended ordinance for the Placitas Area is to mix these together, that should be indicated here, and both should be quoted.

Page 59, first bullet – We recommend that the section on the Wildlife Corridor should be replaced with the following stronger statement:

The residents of the Placitas area are interested in the county supporting policy and open space connections as well as infrastructure that does not impact wildlife connections. A group of Placitas residents, in cooperation with several organizations, has studied, identified, defined and documented the Placitas portion of a major, established wildlife corridor which traverses the United States from Canada to Mexico. The Placitas portion of the corridor is outlined on the accompanying map. It is recommended that Sandoval County request the New Mexico Game&Fish Department and the United States Fish&Wildlife Service to review and verify the

identified corridor. The land encompassed by the corridor should be protected from development until such time as the verification study is completed.

The maps specifying this land has been supplied to the Development Departing and Planning and Zoning Commission.

Page 59, second bullet – The section on allowed cluster development and incentives should be amplified with more specific language and examples, possibly also with illustrations, to make clear just how this would work. This should clarify the following points: 1) The clustered houses would be required to be single family residences. 2) A formula, or fairly specific guidelines for a formula, should be given here as to how many houses would be allowed in the clustered area, based on the property's predevelopment acreage and the undevelopable part of that acreage. 3) It should be specified that the 50% of the predevelopment acreage be devoted to public Open Space. 4) Setbacks should be specified for the clustered houses.

Page 60, 1st bullet – We recommend replacing the statement on the Loop Road with this amplification:

Virtually all participants from the area were overwhelmingly in opposition to a loop road through Placitas. Although at this time and in the foreseeable future there is no compelling reason for a loop road, and the County understands the concerns of area residents, Sandoval County cannot forever close the opportunity to study transportation issues based on future needs or growth driven conditions in Placitas or in other parts of the County. Appropriate level Transportation Impact Studies and Analysis and extensive community involvement would be required prior to the construction of any loop road.

Page 60 – We recommend adding a bullet, reading:

Due to the already overtaxed nature of the existing interchange at Exit 242, appropriate level Traffic Impact Studies and Analysis, addressing specifically the impact to the interchange and the frontage roads, would need to be performed prior to allowing commercial and large scale residential development to occur, especially large scale residential and commercial development along the frontage roads. The results of the Traffic Impact Studies and Analysis would need to be made available to the public for review prior to the approval of any commercial or large scale residential development.

Page 60 – We recommend adding another bullet, reading:

Improvements to local roads, which do not currently meet County standards, must be made prior to allowing additional or new development to utilize the road to obtain access to the major arterial road network.

Page 61 – We recommend replacing the final bullet with the following:

Implement future findings by the New Mexico Game and Fish regarding wildlife habitat improvement, to assure that roads and development comply with wildlife corridor practices already developed by the NMDOT, and to assure that development does not prohibit free movement of keynote species nor degradation of critical habitat.

Page 61 – We recommend adding a bullet, reading:

Recommend to the BLM that its over 3,000 acres along the northern boundary of the Placitas Area be given a designation of Area of Critical Ecological Concern (ACEC), that it preserve the Wildlife Corridors between the Sandia and Jemez mountains, and that it maintain the present low impact recreational opportunities for the public.

Page 61 – We recommend adding another bullet regarding the environmental impact of mining and similar operations on Open Space land:

Implement the New Mexico Environment Department Air Quality 2003 Guidelines to block expanding gravel mining operations that would considerably worsen the already serious respiratory health issue caused by airborne contaminants emanating from the existing facility (silicates – known carcinogens), and that gravel mining should not be allowed to operate near Native American “sacred sites,” residential neighborhoods, historic rural communities, or in areas where the resulting “scar” will ruin a scenic viewshed.

Page 62 – County recommendations should call for encouraging water metering and rain water collection, along with some regulations and/or incentives to achieve this goal.

Pages 62-63 – The recommendation for a campus for public facilities on this 6 acres does not take into account that only the portions already allocated are feasibly buildable. Perhaps the Area Plan should be more specific as to what future public facilities might be needed, what their approximate size would be, and where they could feasibly be located.

We also believe that a major omission in the draft is any mention of development along the I-25 frontage road, both north and south of Hwy 165. This definitely falls within the Placitas Area. In the OnePlacitas Recommendations, submitted to the County, there were specific recommendations for development along the frontage road, largely based upon ideas presented to us by Mr. Gonzales. The Town of Bernalillo has also expressed interest in some of these properties, but at this time these fall within the Placitas Area. And regardless of the future jurisdictions, this portion of Placitas is of vital concern to its residents. The traffic implications alone of development there would impact all Placitas. Perhaps this could be treated as a seventh Community District.

Respectfully submitted,

OnePlacitas