

March 16, 2009

Orlando Lucero, County Commissioner
Don Leonard, County Commissioner
David Bency, County Commissioner
Glenn Walters, County Commissioner
Darryl Madalena, County Commissioner
John Arango, Planning & Zoning Commissioner
Todd Hathorne, Planning & Zoning Commissioner
Robert Cote, Planning & Zoning Commissioner
Henry Street, Planning & Zoning Commissioner
Pat Vester, Planning & Zoning Commissioner
Ralph Martinez, Planning & Zoning Commissioner
Mike Lucero, Planning & Zoning Commissioner
Juan Vigil, County Manager
David Matthews, County Attorney
Michael Springfield, Development Director
Moises Gonzales, Long Range Planner

Re: Placitas Area Plan

Dear Commissioners and County Officials,

We compliment the County Development Department and Planning & Zoning Commissioners for their hard work towards making the Placitas Area Plan reflect the wishes of the community. A lot of the specificity developed by community consensus has been substituted with broad statements. Regardless, a number of suggestions of ours and other community groups and individuals have been incorporated into the final draft of the Area Plan. Much work still needs to be done to turn the Area Plan policies into zoning and subdivision regulations, and we look forward to participating fully in this phase of the process. For the most part we feel that if the regulations are written in accord with the currently defined Area Plan policies, then the plan will serve as a reasonable foundation for preserving the character of Placitas, while at the same time allowing for responsible development in presently undeveloped areas.

There is however one area of the present draft that we feel is unsatisfactory, namely that having to do with water and drainage issues. A great deal of work and discussion has focused on these issues throughout the planning process. At every stage of this effort, there has been both extensive self directed community consensus and hours of testimony to Sandoval P & Z Commissioners and staff towards the necessity of wise water policy. Planning process participants have recognized wise water policy as crucial to development that will allow a sustainable future Placitas. These concerns have been repeatedly voiced both by members of the community and by officials and commissioners with the county. The county commissioned study of Placitas Area water clearly identified water as the limiting factor to responsible development in most of Placitas.

The water issue was discussed at the Sandoval County P & Z Commission meeting on February 26, 2009 when the Area Plan was submitted for their approval. At that meeting, the County Development Department staff presented a memo accepting some of our (and other's) suggestions, including specific text on water and storm water recommendations. Our understanding was that that text was accepted by the P & Z Commission to be included in the Plan. However, for some reason unknown to us, it was not.

At present the plan's language only partly, and insufficiently, incorporates wise water policy recommendations. Given the great importance of water issues in any adequate plan for development, and particularly in Placitas, we again strongly request that the following recommendations be included in the final Area Plan:

Water Recommendations

The County will do everything possible to discourage new individual domestic wells and instead encourage the connection of housing units in subdivisions to shared systems or community water systems using system wells for water supply. The advantage of the community systems or the shared wells is the management of the water supply that is inherent in the metering of wells of this type, allowing system management and the user / customer to see their usage, be part of realistic conservation programs, and provide for identification of water losses. Additionally, the County will encourage policies that will decrease ground water mining for residential landscape, such as rain water harvesting and low water use plant species appropriate to water availability.

Supporting Fact -- This language concurs with the publically stated policy of Sandoval County which is: "Water availability governs land use".

Storm Water Recommendations

The County will only approve a subdivision or building permit when each lot has both a building and an area suitable for a septic field (unless a community or shared sewer system will be used) that is entirely outside of any arroyo erosion zone. Additionally each proposed improvement will include in its site plan hydraulic design to demonstrate adequate detention and/or retention of runoff created by impervious surfaces of the new construction. The drainage plan required for review and approval may require stamped approval by a registered engineer. The bounds of an arroyo erosion zone and requirements for on-site detention will be determined by ESCAFCA (Eastern Sandoval County Arroyo Flood Control Authority).

In November of 2008, ESCAFCA was formalized by election to become a governing flood control authority. Flood control and storm water mitigation will come under the authority of this body after completion of intergovernmental agreements of Sandoval County and the Town of Bernalillo. Therefore, review and approval of acceptable storm water management and erosion control, regardless of size of development, will require ESCAFCA approval. Sandoval County Development Division will support early approval of intergovernmental agreements and will work with ESCAFCA to develop a comprehensive approach to dealing with drainage issues in the Placitas Plan Area.

One further recommendation concerns the Existing Conditions description of the project for rebuilding the intersection of the I-25 freeway with highways 550 and 165. The statement on page 16 presently reads: "NM DOT has listed the redesign and construction of I-25/US 550 Interchange as a priority; it will go to bid in 2009 with construction following within approximately 2 years." We previously pointed out that it is highly uncertain that this project will be completed within that time framework, and recommended that this uncertainty be acknowledged. Discussing this with Moises Gonzales, he agreed that only the first part of this statement should appear here: "NM DOT has listed the redesign and construction of I-25/US 550 Interchange as a priority."

If these recommendations are not acceptable to county staff, we would appreciate an explanation why not.

Thank you for your attention to these important matters.

Respectfully submitted,

Orin Safier for OnePlacitas