

SANDOVAL COUNTY COMMISSION

RE: Homestead Village, Inc., Application ZNCH-20-001, for an amendment to the existing Homestead Special Use (SU) zone district in Placitas

To All County Commission Members,

The Eastern Sandoval Citizens Association (ESCA) is a N.M. non-profit association of residents of Eastern Sandoval County, organized for the purpose of protecting the environment, quality of life and property values of the citizens of that area of the county. As stated on ESCA's website (es-ca.org), ESCA monitors proposed legislative and other governmental activities that might impact eastern Sandoval County or its residents, reports on those activities and ensures that the voices of its constituents are heard.

ESCA is contacting the Sandoval County Commission (the "Commission") at this time to comment on the above-referenced zone change application for an amendment to the Homestead Special Use District (SUD) in West Placitas. ESCA is not, at this time, expressing any view on whether residential development density of greater than 1 residence per acre (see Placitas Area Plan, p. 43) should be allowed in the Homestead SUD or at any other location in eastern Sandoval County. Rather, the purpose of this letter is to point out to the Commission significant problems with the Homestead application which make it impossible to determine whether the proposed zoning amendment will be to the benefit or detriment of the residents of West Placitas. These problems are as follows:

1. The application is unacceptably vague in that it is for "multi-family use." "Multi-family use" is not a defined term in the Sandoval County Comprehensive Zoning Ordinance (CZO). The definitions section of the CZO (Section 6) does have a definition for a "cluster housing development" but that term was not, for some reason, used by the applicant, perhaps because a cluster housing development requires a master plan and common open space. In any event, the term "multi-family use" could mean anything from several families in one unit, to multiple attached units, to major apartment complexes. The point is that we just don't know at this point, because the designation "multi-family" is too open-ended and ambiguous.
2. The application covers the full 8.32 acres of the Homestead SUD which means that, if the application were to be granted, theoretically the Homestead Shopping Village could be razed and an enormous apartment complex constructed on the site.
3. The applicant submitted no site development plan (at least none was attached to material posted on the County's website). Normally, a site development plan must be submitted with any application for a zone change (see, e.g., CZO Section 10.B). Without a site development plan, ESCA and its constituency cannot determine the size, precise location, and arrangement of all structures, parking areas, water availability, liquid waste disposal, drainage facilities, landscaping, traffic and pedestrian routes, and compliance with Section 14 of the CZO (accessory buildings, height limitations, fences and walls, outdoor lighting, etc.). As a consequence, the absence of a site plan prevents ESCA (and other interested parties) from engaging in meaningful analysis of the application.