

BEFORE THE BERNALILLO COUNTY, NEW MEXICO
BOARD OF COUNTY COMMISSIONERS

SOUTHWEST ORGANIZING PROJECT,
NEW MEXICO HEALTH EQUITY WORKING
GROUP, and PAJARITO VILLAGE ASSOCIATION,

v.

FILE NO. CZ-20130009

BERNALILLO COUNTY PLANNING COMMISSION

AMENDED APPEAL OF THE
BERNALILLO COUNTY PLANNING COMMISSION DECISION
APPROVING AMENDMENT OF THE ZONE MAP
IN CONNECTION WITH
PROPOSED SANTOLINA PLANNED COMMUNITIES
LEVEL A MASTER PLAN

Introduction

This is an amended appeal of the Bernalillo County Planning Commission (“the Planning Commission”) decision approving a zone map amendment in connection with the proposed Santolina Planned Communities Master Plan and recommending to the Bernalillo County Board of County Commissioners that it approve the zone map amendment. This amended appeal is filed by the SouthWest Organizing Project, the New Mexico Health Equity Working Group, and the Pajarito Village Association (referred to collectively as “the Appellants”).

The Planning Commission’s decision approving the requested zone map change and recommending that the Bernalillo County Board of County Commissioners approve the zone map amendment (“the Planning Commission’s Decision”) was voted on by the Planning Commission on December 3, 2014. For that reason, the Appellants filed their original appeal by 12:00 noon on December 18, 2014. Since notice of the Planning

Commission's Decision was not issued until December 12, 2014, and because the notice of the Planning Commission's Decision stated that appeals from that Decision could be filed by 12:00 noon on December 29, 2014, the Appellants reserved the right to file this amended appeal by 12:00 noon on December 29, 2014, which is the first work day following the 15th day after the written notice of the Planning Commission's Decision. (The written notice was dated December 12, 2014, and the 15th day after that date is December 27th, a Saturday.)

In addition, the Appellants continue to reserve the right to address the Bernalillo County Board of County Commissioners concerning this appeal through their representatives and through their counsel at any hearing conducted by the Board of County Commissioners addressing the zone map amendment.

The Appellants request that the members of the Bernalillo County Board of County Commissioners reverse the Planning Commission's Decision approving the requested zone map amendment and rule that the requested zone map amendment is denied. This request is based on the following four reasons.

First, the applicant for the zone map amendment has not demonstrated that the existing zoning is inappropriate pursuant to Bernalillo County Resolution 116-86 ("Resolution 116-86").

Second, the zone map amendment does not comply with the requirement of Resolution 116-86 that a land use change not be in significant conflict with adopted elements of the Comprehensive Plan or other County Master Plans and amendments thereto.

Third, the zone map amendment would allow uses of the land involved for purposes that would be harmful for the community.

Fourth, the zone map amendment is not consistent with the health, safety, and general welfare of the county.

Alternatively, if the Board of County Commissioners upholds the Planning Commission's Decision to grant the requested zone change, the Board of County Commissioners should do so only subject to the conditions that are spelled out on pages 13 to 18 below.

- I. The Board of County Commissioners should reverse the Planning Commission's Decision.
 - A. The applicant for the zone map amendment has not demonstrated that the current zoning is inappropriate.

Bernalillo County Resolution 116-86 provides that:

The applicant [for a zone map amendment] must demonstrate that the existing zoning is inappropriate because:

- (1) There was an error when the existing zone map pattern was created; or
- (2) Changed neighborhood or community conditions justify the land use change; or
- (3) A different use category is more advantageous to the community, as articulated in the Comprehensive Plan or other County Master Plan, even though (1) or (2) above do not apply.

Here, there has been no demonstration by the applicant for the zone map amendment that the existing zoning for the land in question is inappropriate. The applicant has neither shown that there was an error when the existing zone map was created nor demonstrated that changed neighborhood or community conditions justify the land use change. Moreover, the evidence in the record concerning the Santolina Master Plan indicates that the proposed new land use category would be less, not more, advantageous to the community for three reasons. First, there is not adequate water to serve a planned community in the area in question. Second, construction of a planned community on the sand dunes in that area would be harmful to the community. Third, a planned community

could not be developed in that area at no net expense to the governments of Bernalillo County and the City of Albuquerque.

1. There is not water available to serve a planned community in the area under consideration.

The information in the record indicates that there is not adequate water for the use of the land in question for a planned community. The July 21, 2014 letter to Joe Chavez of the County Planning Commission from Stephen Glass cites a presentation made in July, 2014 by Bruce Thomson to the effect that water resources in the Middle Rio Grande are over-allocated by approximately 40 acre-feet per year. *See* Attachment 22 to the Planning Staff's Report. The absence of additional water supplies in the region is also attested to by the policy adopted by the Albuquerque/Bernalillo County Water Authority ("the Water Authority") to the effect that any new development that is outside of the Water Authority's service area (such as the proposed Santolina development) must provide its own water rights or funds with which to purchase water rights. (The Water Authority's Water Resources Management Strategy is contained in Attachment 22 to the Bernalillo County Planning Commission's staff's report ["the Planning Staff's Report"].)

Moreover, the Planning Staff's Report itself indicates that there are problems with the availability of water for the proposed development. At page 22 of the Planning Staff's Report, the staff commented that the Santolina Master Plan should provide more information about water availability. On page 23 of that Report, the staff stated that the water plan submitted in the Santolina Master Plan is "conceptual". On page 24 of its Report, the staff stated that more detailed information is needed in several areas, including the Environment and Open Space category, which includes availability of water and water

rights. Finally, on page 27 of its Report, the staff stated that the Water Authority had commented that “water or service is not currently available to the subject property”

2. Construction of a planned community on the sand dunes in the area in question would cause adverse impacts to the community.

The evidence before the County Planning Commission demonstrates that the soil in much of the area for which the zoning map amendment is sought consists of erodible sand dunes. This was noted in several comments submitted to the County Planning Commission. Paul Lusk raised this issue in his letter dated September 22, 2014 that is provided in Attachment 27 to the Planning Staff Report. It was also raised by Laura Gleason in the information that she provided as part of Attachment 26 to the Planning Staff Report; that information includes maps of areas of blowing sand in the La Mesita Negra SE Quadrangle in Bernalillo county. And it was raised by the letter from Jacque Garcia of Bernalillo County Place Matters to Joe Chavez, Chair of the Bernalillo County Planning Commission that is included in Attachment 20 to the Planning Staff Report.

The adverse health impacts that could result from such blowing sand were pointed out by the Health Impact Assessment conducted by Bernalillo County Place Matters. That Assessment, which is included in Attachment 27 to the Planning Staff Report, stated:

Sand dunes – Site development impacts to the fragile desert ecosystem, consisting of large lateral expanses of sand dunes, and the potential for erosion on high wind days to contribute to air pollution, asthma and lower and upper respiratory illness.

...

The development is likely to impact the ancient sand dunes covering the proposed site. The impact is likely to cause short-term soil disturbance and long-term air quality issues resulting from the erosion of sand dunes in high wind events. The particles caught up in the wind have serious health impacts.

Construction of a planned community at the proposed Santolina development site therefore would adversely affect the community. For that reason, the zone map amendment that would allow such construction is not appropriate.

3. A planned community the size of the proposed Santolina development would likely result in net expenses to Bernalillo County and the City of Albuquerque.

The most realistic analysis of the fiscal and economic impacts of a planned community the size of the proposed Santolina development was conducted by Ph.D. economist Kelly O'Donnell, who is a former Deputy Cabinet Secretary of the New Mexico Economic Development Department, a past Chair of the New Mexico Spaceport Authority, and a former Superintendent of the New Mexico Regulation and Licensing Department. In her analysis, which is included in Attachment 30 to the Planning Staff Report, Dr. O'Donnell pointed out the flaws in the Santolina Master Plan assertion that the Santolina development could be completed without net expense to the Bernalillo County and City of Albuquerque governments.

First, Dr. O'Donnell stated that the Santolina Master Plan incorrectly assumed high rates of population growth and job creation in western Bernalillo county during the next 20-50 years. In fact, however, New Mexico's working population is shrinking in large part because the economy here cannot sustain enough good jobs to keep working people here. The University of New Mexico Bureau of Business and Economic Research predicts that by the year 2030 about half of the New Mexico population will be either over 65 or under 18.

Second, based primarily on its assumption that there will be strong population growth, the Santolina Master Plan predicts that 25,000 new jobs will be created by businesses at Santolina by the year 2035, and 75,000 new jobs will be created there during

the next 40 to 50 years. These figures are seriously at odds with the projections of the Bureau of Business and Economic Research and the Mid Region Council of Governments, which predict that only about 7,700 new jobs will be created in the area that includes Santolina by the year 2035. Moreover, the Albuquerque MSA's economic weaknesses are systemic, which indicates that further population declines and anemic job growth are likely. The State Economic Development Department projects that Bernalillo county's population growth rate will continue to decline, and that the county's rate of growth may be only about 0.8% from 2035 to 2040.

Third, an analysis of the 2013 census data for western Bernalillo county indicates that two thirds of the people who moved there did so from other locations within the county. And, the majority of the remaining one third of those people moved to the west side of Bernalillo county from counties surrounding Bernalillo county. This means that only about 20% of the people who would move to Santolina would do so from areas other than the middle Rio Grande Valley.

These realistic projections indicate that the projections for the tax revenue that would be created by the Santolina development are unrealistically high. Moreover, the Santolina Master Plan understates the costs that would be incurred by Bernalillo County for the development. The Master Plan's estimates of County costs do not include any expenditures for new infrastructure, infrastructure maintenance, or open space acquisition, even though the Master Plan appears to assume that the County would acquire, develop, and maintain open space for the development. Even more importantly, the Master Plan does not consider the costs that will be incurred for transportation and water.

In addition, although growth at Santolina caused by movement of population from within Albuquerque to the development would benefit Bernalillo County's tax

base, such growth would reduce tax revenues for the City of Albuquerque. Finally, growth at Santolina would increase concerns within the region about the availability and cost of water, which has become a serious issue for businesses that are considering whether to relocate to different areas.

4. The Planning Commission's Decision does not adequately address any of these issues.

Nothing in the Planning Commission's Decision provides any analysis or other basis for a determination that the zone change is consistent with Resolution 116-86. On the contrary, the Decision merely alleges that the existing zoning is inappropriate and that the Santolina Master Plan complies with applicable requirements. The Decision states:

7. The request for Level A Planned Community Zoning for Santolina is consistent with Resolution 116-86 for the following reasons:
 - a. The request is consistent with the goals and plans in the approved Santolina Level A Master Plan, as well as policies in the Albuquerque/Bernalillo County Comprehensive Plan for master planned communities;
 - b. The request has demonstrated that the existing zoning on the property (primarily A-1 zoning) is no longer appropriate and the proposed development is more advantageous to the community by furthering and implementing the goals and plans articulated in the approved Santolina Level A Master Plan, as well as the Planned Communities Criteria and the Albuquerque/Bernalillo County Comprehensive Plan for master planned communities.

These allegations are merely conclusory statements without any analysis or other basis to support them. At no point does the Planning Commission's Decision address any of the issues that have been raised by the Appellants in their amended appeal of the Santolina Master Plan ("the Santolina Master Plan Amended Appeal") (a copy of which is attached and incorporated by reference). Moreover, as is spelled out below, the Planning

Commission's assertion that the Santolina Master Plan and the zone change comply with applicable Bernalillo County Plans is not accurate.

- B. The zone map amendment is not consistent with requirements of governing Bernalillo County Plans.

Resolution 116-86 also requires that a proposed change in land use not be in conflict with applicable elements of Bernalillo County Plans. It provides:

- C. A proposed land use change shall not be in significant conflict with adopted elements of the Comprehensive Plan or other County Master Plans and amendments thereto including privately developed area plans which have been adopted by the County.

The zone map amendment at issue does not comply with this requirement.

The zone map amendment would change the zoning in the area in question from an A-1 Rural Agricultural Zone to a Planned Communities Zone. The planned community for which this zone map amendment is sought is the proposed Santolina development, and the outlines of that planned community were presented in the Santolina Master Plan. As the Appellants have demonstrated in their amended appeal of the Bernalillo County Planning Commission recommendation that the Bernalillo County Board of County Commissioners approve the Santolina Master Plan, that Master Plan does not comply with five requirements of applicable Bernalillo County Plans.

First, the Santolina Master Plan does not comply with the requirements of the Bernalillo County Planned Community Criteria ("the Planned Community Criteria") that a developer provide documentation of physical and legal water availability. Second, the Santolina Master Plan does not provide an adequate transportation plan for the proposed development. Third, there is no showing in the Santolina Master Plan that the development will support schools needed for the population of the proposed development. Fourth, the Santolina Master Plan has not adequately taken into account the impacts that would result

from construction of the proposed development on the sand dunes that exist in the area where the development is proposed. Fifth, the most realistic analysis of the economics of the proposed development indicates that it cannot be constructed at no net expense to the governments of Bernalillo County and the City of Albuquerque.

The failure of the Santolina Master Plan to meet these requirements demonstrates that the zone map amendment is not appropriate. This is not a zone map amendment that should be considered in the abstract; it is a zone map amendment for the specific purpose of facilitating the proposed Santolina development. Because that proposed development's Master Plan does not comply with applicable Bernalillo County requirements, the zone map amendment that is tied to that proposed development should not be approved.

C. The zone map amendment would adversely affect the community.

As is noted above, the Planning Commission's Decision asserts without support that the zone change is advantageous to the community. There is no merit to that unsupported allegation.

First, there is no water in the region for the proposed Santolina development to use. For that reason, use of water for that proposed development would necessarily mean reduction in the amount of water that is available for other purposes. Particularly because of the size of the proposed development, that reduction in available water would adversely affect one or more sectors of the existing community.

Second, the construction of the proposed Santolina development on the sandy soils where it is proposed to be built would adversely affect the community. As was pointed out above, disturbance of those soils would probably result in erosion and airborne particulates that have the potential to cause air pollution and health problems, including asthma and upper and lower respiratory illness.

Third, the proposed Santolina development cannot be built without net expense to Bernalillo County and the City of Albuquerque. This was demonstrated by the analysis conducted by Kelly O'Donnell, who concluded that the Santolina Master Plan's assertion that no net expense would result from the proposed development was based on unrealistic assumptions. And, any net expense that would result from the proposed Santolina development would have to be borne by other sectors of the community, either in the form of higher taxes or in the form of reduced services.

D. The zone map amendment is not consistent with the health, safety, and general welfare of the county.

Finally, Resolution 116-86 also requires that any zone change be consistent with the health, safety, and general welfare of the residents of Bernalillo county. The Planning Commission's Decision purports to address this requirement by another unsupported allegation. The Decision states only that:

The request [for the zone change] is consistent with the health, safety, and general welfare of the residents of Bernalillo County.

In fact, however, the zone map amendment is not consistent with the health, safety, and general welfare of Bernalillo county because the development that would be permitted by the amendment would have adverse effects on the county. The first of these adverse effects would be the development's use of a very large amount of water that is not available in the county. The only way that this amount of water can be available from the county is if it is taken from sectors of the county community that are using the water, and those sectors would be adversely affected if they lose their water.

As an example, if water is taken from surface water sources in the South Valley, the entities that will be harmed will be the South Valley acequias. If water is taken from the ground water aquifer in the South Valley, the many residents of

that area who rely on wells will be adversely affected. In short, if the development's need for water is addressed by taking water from elsewhere in the county, some other sector of the county community will be impacted adversely.

Moreover, as was pointed out in the Bernalillo County Place Matters Report that is part of Attachment 27 to the Planning Staff's Report, water shortages cause health problems:

Water is not only important to the cultural and farming traditions of acequia users, but to our local residents as well. The availability of fresh, local produce generated through our local agriculture sector not only helps farmers, but also improves nutritionally based health outcomes such as obesity and diabetes. Healthy eating and regular physical activity can lower blood pressure and prevent a range of chronic diseases. ... Most importantly, the availability of water is essential to the wellbeing, and life, of current residents.

The second adverse impact that construction of the proposed Santolina development would cause is the impact on health resulting from construction of such a large development on sandy soils. The hazards to health that can result from large scale construction in such soils were outlined above and in the Bernalillo County Place Matters report that is part of the record. *See* Attachment 27 to the Planning Staff's Report. And because the proposed Santolina development would be built out over a period of 40-50 years, the hazards to health resulting from construction at the development would not be a phenomenon of short duration.

The third adverse impact on Bernalillo county that would result from the proposed Santolina development that the zone map amendment would authorize is an impact on the Bernalillo county economy that would result from the costs that would have to be incurred for the purpose of building schools for children living in the development. According to an October 24, 2013 email from Martin Eckert of the Albuquerque Public Schools to Enrico

Gradi and others (which is part of Attachment 4 to the Planning Staff Report), all costs of schools for the development would have to be borne by taxpayers. Moreover, the Planning Staff Report concludes that the cost to taxpayers of the schools needed for the development (without considering the cost of the land required) would be \$654 million in today's dollars. Those costs would have a serious adverse effect on the county's general welfare.

The fourth adverse impact that the zone map amendment would have on the health, safety, and general welfare of the county is another fiscal impact that would result from the development that the zone map amendment is designed to authorize. As was pointed out earlier, that development probably could not be constructed at no net expense to the governments of Bernalillo County and the City of Albuquerque. As a result, construction of the development would cause one of two results. Either City and County revenues would have to be increased, probably through raises in taxes, or government services would have to be reduced. Either of those results would be contrary to the general welfare of the county.

- II. If the Board of County Commissioners approves the zone change, the Board of County Commissioners should require the developer to comply with the following conditions to address the problems raised by the zone change and the Santolina Master Plan.

As is explained above, the proposed zone map amendment does not comply with the requirements of Bernalillo County Resolution 116-86 for zone changes. For that reason, if the Board of County Commissioners upholds the Planning Commission's Decision authorizing the zone map amendment, the Board of County Commissioners should do so only if the Santolina developer complies with the conditions specified below. Moreover, in order to protect the rights of individuals and organizations concerned about the zone map amendment, the Board of County Commissioners should require that any

demonstration made by the developer concerning any of the conditions below be provided to all of the individuals and organizations listed on the service list for the Planning Commission's Decision dated December 12, 2014. Furthermore, in order to give the individuals and organizations on that list an opportunity to analyze and prepare responses to any demonstration made by the developer, the Board of County Commissioners should require that each demonstration be provided to those individuals and organizations at least six months prior to the submission of any further planning documents for the zone map amendment or the proposed Santolina Master Plan.

- A. Approval should be contingent on the Santolina development making the required demonstration as to availability of physical water and water rights and on that demonstration showing that the development would not impair existing users' water rights.

For the reasons outlined above and more fully explained in the attached Santolina Master Plan Amended Appeal, the Santolina Master Plan does not comply with the Planned Communities Criteria requirement that a developer demonstrate the availability of physical water and water rights. Because the Master Plan does not make that showing, it is not clear what the source or sources would be for water for the proposed development. For that reason, and in order to protect existing uses of water in Bernalillo county, the Board of County Commissioners should condition approval of the Santolina zoning change on the following conditions concerning water for the proposed development.

First, the developer of the proposed Santolina development should be required to demonstrate the availability of physical water and legal water rights and provide. Second, any demonstration of the availability of physical water should be based on one or more studies by reputable hydrologists or engineers licensed to practice in New Mexico

explaining what the source or sources of the physical water would be and the period of time during which the water would be available.

Third, any demonstration of the availability of legal water rights should be based on a determination by the New Mexico State Engineer indicating that the developer of the proposed Santolina development has the legal right to use the water in question and that either: 1) the time period for protests concerning those water rights has expired or 2) any protests concerning those water rights, including appeals of rulings on any such protests, have been resolved in the developer's favor.

Fourth, any demonstration of the availability of either physical water or legal water rights should show that the use of water by the proposed development would not impair the use of water by any existing water user in Bernalillo county.

- B. Approval of the zoning change should be conditioned on agreement by the Planning Commission and the New Mexico Department of Transportation to the proposed Santolina development's transportation plans.

As was explained fully in the attached Santolina Master Plan Amended Appeal, both the County Planning staff and the New Mexico Department of Transportation commented on deficiencies in the Santolina Master Plan's information concerning transportation. First, the transportation plan should address the problems noted by the New Mexico Department of Transportation. These include: 1) the lack of adequate information about the internal road system, which should be a grid system and which should tie into the wider transportation system; 2) the inappropriate proposal to have two major roads go through the urban center; and 3) the need to follow State road requirements in the development, particularly at interchanges with State roads, including the interchange at Shelley Road.

Second, the proposed transportation plan should eliminate the current proposal for major arterials to go through Major Public Open Space. Third, the proposed transportation plan should include provisions for the roads on the west side of the proposed development to be in compliance with the Metropolitan Transportation Plan.

Finally, the developer of the proposed Santolina development should be required to demonstrate that the transportation system for the proposed development will be constructed at no cost to either Bernalillo County or the City of Albuquerque.

- C. The developer of the proposed Santolina development should be required to demonstrate that the development would neither cause the APS District to spend additional funds nor add students to existing schools in the APS District.

The proposed Santolina development would be within the APS District, but as was pointed out in the attached Santolina Master Plan Amended Appeal, the Santolina Master Plan provides only general information about the schools that would be required for the development. For that reason, it is not clear whether students from the development would attend existing schools within the District or whether new schools would be constructed for those students. However, many of those existing schools are already overcrowded, and it therefore would be inappropriate to add students to those schools. Moreover, the cost of new schools for the proposed development would have to be paid by taxpayers, and the Planning Commission staff estimated the cost of the schools needed for the development would be \$654 million in today's dollars even without considering the cost of the land required.

For these reasons, if the Board of County Commissioners approves the Santolina zone change, the Board of County Commissioners should require that the developer demonstrate that the proposed development would not add students to APS District schools

and that the cost of schools for students from the proposed development would be covered by the proposed development and not by taxpayers in Albuquerque or Bernalillo county.

- D. Approval of the Santolina Master Plan should be conditioned on monitoring of air emissions from construction to ensure that the sand-based land does not cause health problems.

The proposed Santolina development would be constructed on sand based land. As explained in the Bernalillo County Place Matters Health Impact Assessment, the blowing sand that would result from construction of the proposed development could cause serious health problems. For that reason, the proposed development should be allowed to proceed only if it is accompanied by air monitors to measure dust from the construction. Those air monitors should be designed and placed subject to the approval of the Bernalillo County Place Matters team that conducted the Health Impact Assessment.

Moreover, this condition should include measures to ensure that construction is either ceased or altered if the monitor readings demonstrate that the levels of dust and other particulates caused by the construction are dangerous to human health.

- E. The Santolina Master Plan should not be approved unless an objective and realistic analysis demonstrates that the development would not result in any net cost to either Bernalillo County or Albuquerque.

The analysis conducted by Kelly O'Donnell demonstrated the flaws in the Santolina Master Plan's assertion that the proposed development would not result in a net cost to either Bernalillo County or the City of Albuquerque. Those flaws include incorrect assumptions about population growth and job creation in western Bernalillo county during the next 25-50 years, inaccurate data about where people moving to the proposed Santolina development are likely to move from, inappropriate estimates about the fiscal impact of the proposed development on Bernalillo County, and failure to consider the effect on the City of Albuquerque of people moving out of the City to the proposed development. For these

reasons, the Santolina Master Plan's assertion that the development would not result in a net cost to local government is not credible.

Because of this failure of the Santolina Master Plan to conduct a realistic analysis of the net cost of the proposed development, the Board of County Commissioners should condition any approval of the Santolina Master Plan on the conduct of a new analysis of the proposed development's net cost to local government. Moreover, the Board of County Commissioners should require that the analysis be conducted by an impartial third party such as the Bureau of Business and Economic Research.

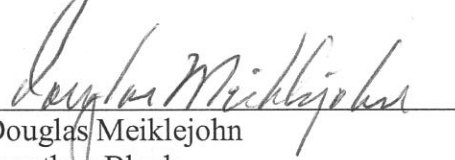
Conclusion

The zone map amendment violates several of the requirements for zone changes of Bernalillo County Resolution 116-86. The Bernalillo County Board of County Commissioners should reverse the Planning Commission Decision approving the zone map amendment, and should rule that the zone map amendment cannot stand.

Alternatively, if the Board of County Commissioners does approve the zone change, the Board of County Commissioners should require that the developer comply with the conditions outlined above.

Dated: December 29, 2014.

NEW MEXICO
ENVIRONMENTAL LAW CENTER

A handwritten signature in cursive script, appearing to read "Douglas Meiklejohn", is written over a horizontal line.

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Certificate of Service

I certify that on December 29, 2014 copies of this Amended Appeal were

mailed to:

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Land Holdings, LLC

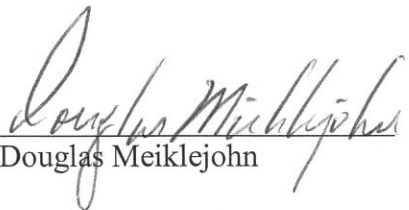
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ZONING SECTION

APPEAL TO COUNTY COMMISSION

Application Date: _____
 Application Number: _____
 Hearing Date: _____

OWNER/ APPLICANT FOR LAND USE REQUEST Western Albuquerque Land Holdings		PHONE 505-764-9801
MAILING ADDRESS PO Box 56790	CITY Albuquerque	ZIP 87187
AGENT (FOR APPEALANT) New Mexico Environmental Law Center		PHONE 505-989-9022
MAILING ADDRESS 1405 Luisa St #5	CITY Santa Fe	ZIP 87505
APPEALANT SouthWest Organizing Project		PHONE 505-247-8832
MAILING ADDRESS 211 10th St SW	CITY Albuquerque	ZIP 87102
SITE ADDRESS		Case # CZ-20130009
DIRECTIONS Bounded by Interstate 40 to north, 118th St. and escarpment to east, Pajarito Mesa on south and escarpment near Rio Puerco valley on west		
LEGAL DESCRIPTION projected sections 1, 2, 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15, 16 & 17, T9N, R1E & sections 6, 7, 8, 16, 17 & 18, T9N, R2E, & sections 32, 33, 34, 35, & 36 T10N, R1E & sections 30 & 31, T9N, R2E, NMPM, Atrisco, BernCo		
ZONE MAP PAGE	CURRENT ZONE(S) A-1	PROPERTY SIZE IN ACREAGE 13700
UPC #	PROPOSED ZONE(S) PC Zone	SUBDIVISION NAME Santolina

CASE # & SCOPE OF APPEAL

Amended Appeal - Bernalillo County Planning Commission decision on Santolina Zoning Change, see attachment

DETAILED INFORMATION

Please see attached amended appeal document

I hereby acknowledge that I have read this entire application and affirm that all of the provided information is correct. I agree to comply with the requirements of Bernalillo County and the State of New Mexico as outlined in all applicable laws, ordinances and regulations.

Douglas Meiklejohn Douglas Meiklejohn 12/29/14
 Printed Name Signature Date