

BEFORE THE BERNALILLO COUNTY, NEW MEXICO

BOARD OF COUNTY COMMISSIONERS

SOUTHWEST ORGANIZING PROJECT, NEW MEXICO HEALTH EQUITY WORKING GROUP, PAJARITO VILLAGE ASSOCIATION, SOUTH VALLEY COALITION OF NEIGHBORHOOD ASSOCIATIONS, JAVIER BENAVIDEZ, SANTIAGO JAMES MAESTAS, ROBERTO ROIBAL, KRISTINE SUOZZI, MARCIA BEAUREGARD FERNANDEZ, ROD MAHONEY, and DANIEL RICHARD “RIP” ANDERSON,

Appellants,

APPEAL NO. COA2017-0001
ORIGINAL CASE NO. SPR2016-0001

v.

BERNALILLO COUNTY PLANNING COMMISSION,

Appellee

RESPONSE IN OPPOSITION TO AND
MOTION TO DISMISS
SANTOLINA DEVELOPERS’ APPEAL OF THE COUNTY PLANNING COMMISSION
DECISION FINDING #19 AND CONDITIONS #5 AND #6

Introduction

The Appellants¹ hereby respond in opposition to the appeal of the January 4, 2017 decision of the Bernalillo County Planning Commission filed by Western Albuquerque Land Holdings, LLC (referred to as “the Santolina Developers” or “the Developers”), and request that the Bernalillo County Board of County Commissioners (“Board of County Commissioners”) dismiss that appeal as untimely. Although the Santolina Developers have titled their appeal as a

¹ The SouthWest Organizing Project, the New Mexico Health Equity Working Group, the Pajarito Village Association, The South Valley Coalition of Neighborhood Associations, Javier Benavidez, Santiago James Maestas, Roberto Roibal, Kristine Suozzi, Rod Mahoney, Marcia Beauregard Fernandez and Daniel Richard “Rip” Anderson.

“Memorandum”, it clearly constitutes an appeal. The Santolina Developers have requested that the Board of County Commissioners reverse the County Planning Commission’s decision in several respects, and calling the appeal a “Memorandum” does not change the true nature of the Santolina Developers’ request.

This Response and Motion to Dismiss are based on the failure of the Santolina Developers to meet the deadline for filing an appeal from a County Planning Commission decision established by the Bernalillo County Zoning Ordinance.

Factual background

At the January 4, 2017 public hearing, the Bernalillo County Planning Commission (“the Planning Commission”) voted to recommend approval of the request for Planned Communities Santolina Level B.1 Master Plan (“the Planning Commission’s Decision”). Agent for the Santolina Developer, Mr. Strozier, advised the Planning Commission of the Developers’ agreement with the proposed findings and conditions to the Planning Commission’s Decision. Planning Commission Hearing Transcript, TR-63: 15-24 (January 4, 2017) (“We – once again, we are in agreement with that – with this moving forward. We have reviewed – I think that’s – those changes are good, and so we are – we are certainly in agreement with the revised language to, I believe, it was conditions 5 and 6 that is being – that is being presented for your consideration...”).

The Appellants filed an appeal to the Board of County Commissioners from the Planning Commission’s January 4, 2017 decision. This appeal was filed before noon on January 19, 2017. The Planning Commission issued a written decision of its January 4, 2017 vote on January 10, 2017. Pursuant to the Bernalillo County Land Use Appeals to the Board of County Commissioners Rules, the filing deadline for appeals of this written decision was by noon on

January 25, 2017. The Appellants subsequently filed an amended appeal before noon on January 25, 2017. This appeal was timely filed pursuant to the Bernalillo County Land Use Appeals to the Board of County Commissioners Rules.

The Developers filed their own appeal of the Planning Commission Decision on March 2, 2017, thirty-six (36) days after the filing deadline. Therefore, the Developers' appeal is not timely filed pursuant to the Bernalillo County Land Use Appeals to the Board of County Commissioners Rules. The Developers have waived their right to appeal and have failed to exhaust their administrative remedies by filing an untimely appeal. The Appellants move to dismiss this untimely appeal.

Argument

I. The Santolina Developers' March 2, 2017 appeal of the Planning Commission's Decision Finding #19 and Conditions #5 and #6 is untimely and must be dismissed.

A. The Bernalillo County Land Use Appeals to the Board of County Commissioners Rules mandate that an appeal of a Planning Commission decision must be filed within fifteen (15) days of the written Planning Commission decision.

The Bernalillo County Land Use Appeals to the Board of County Commissioner Rules ("Bernalillo County Land Use Appeals Rules") state the following, in pertinent part:

Written application for appeal (either approval or denial) to the Board of County Commissioners must be filed by 12 noon, within fifteen (15) days of the written CPC determination, at the Planning & Development Services Department.

Planning Commission Decision, page 5 (January 10, 2017).

In addition, the written Planning Commission Decision provided notice of this fifteen (15) day requirement, along with additional filing requirements (such as using the appropriate appeals form and paying the required appeal filing fee). *Id.*

The Planning Commission issued its written decision of its January 4, 2017 vote on January 10, 2017. Pursuant to the fifteen (15) day rule, the filing deadline for appeals of this written decision was January 25, 2017. The Developers filed their appeal of the Planning Commission Decision on March 2, 2017, thirty-six (36) days after the filing deadline. For these reasons the Board should dismiss the Developers' untimely appeal.

B. The Developers have failed to show good cause for their untimely appeal of the Planning Commission Decision.

The Santolina Developers are well aware of the Bernalillo County Land Use Appeals Rules. The Developers have previously filed an appeal of a Planning Commission decision. *See* Exhibit A, "Western Albuquerque Land Holdings LLC SPR-20130004/Appeal of Certain Findings and Portions of Findings and Certain Conditions and Portions of Conditions Adopted on December 3, 2014, by the County Planning Commission in Connection With its Recommendation of Approval of the Santolina Level A Community Master Plan" ("Appeal Request COA2015-0005"). The Developers submitted their appeal using the proper county form, referenced their objections to certain findings and conditions as an "appeal", filed within the fifteen (15) day deadline, and paid the required appeal filing fee. *Id.*

The Developers' knowledge of the County's fifteen (15) day filing deadline rule, based on their previous timely appeal, demonstrates that good cause does not exist for their untimely appeal and that the Developers have failed to exercise due diligence in attempting to meet the filing deadline. To establish good cause for a filing delay, the Developers must show that "the delay was excusable under the circumstances" and that the Developers "exercised due diligence in attempting to meet the filing deadline." *Gribcheck v. MSPB*, 145 Fed. Appx. 359, 362 (Fed. Cir. 2005). The Developers knew they had a right to appeal and knew the deadline for so doing,

yet failed to act diligently. For these reasons the Board should dismiss the Developers' untimely appeal.

C. The Santolina Developers have waived their right to appeal.

As stated previously, the deadline to file an appeal on the Planning Commission Decision in this matter was January 25, 2017. The Developers filed an appeal of the Planning Commission's Decision Finding #19 and Conditions #5 and #6 on March 2, 2017, thirty-six (36) days after the filing deadline. The Developers were provided with notice of the fifteen (15) day filing deadline rule and demonstrated knowledge of this rule in their previous appeal of the Planning Commission's written decision recommending approval of the Level A Master Plan. Therefore, the Developers cannot demonstrate good cause for their untimely appeal. The Developers have waived their right to an appeal by failing to timely file an appeal pursuant to the Bernalillo County Land Use Appeals Rules. For these reasons the Board should dismiss the Developers' untimely appeal.

D. The Santolina Developers have failed to properly exhaust their administrative remedy in this matter.

The doctrine of exhaustion of administrative remedies is well established in the jurisprudence of administrative law. In *Woodford v. Ngo*, the United States Supreme Court determined that, "Proper exhaustion *demand compliance with an agency's deadlines* and other critical procedural rules because no adjudicative system can function effectively without imposing some orderly structure on the course of its proceedings." *Woodford v. Ngo*, 548 U.S. 81, 90 (2006) (emphasis added). The Developers have failed to properly exhaust their administrative remedy by not complying with the Bernalillo County Land Use Appeals deadline. This procedural default precludes the Developers from now appealing the County Planning Decision. For this reason the Board should dismiss the Developers' untimely appeal.

E. The Santolina Developers' disregard of County Planning Commission appeals procedure and deadlines prejudice the Appellants.

Finally, the Developers' disregard for county deadlines and procedure prejudice the Appellants in this matter. Had the Developers complied with the Bernalillo County Land Use Appeals Rules and filed their appeal on January 25, 2017, the Appellants would have had reasonable time to respond to the Developers' appeal. Instead, the Appellants were provided with insufficient notice of the Developers' appeal, leaving Appellants with only three days to respond.² Notice of the Developers' appeal was provided via an email from county staff on March 6, 2016, one week prior to the March 14, 2017 hearing scheduled for Appellants' timely appeal of the Planning Commission Decision and their Motion for Deferral of the March 14, 2017 Hearing on the Santolina Level B.1 Master Plan. County staff demanded that any response to the Developers' appeal be submitted by the morning of March 9, 2017. *See* Exhibit B. For this reason the Board should dismiss the Developers' untimely appeal.

Conclusion

The Developers filed an appeal of the Planning Commission Decision thirty-six (36) days after such written decision was issued, in violation of the fifteen (15) day filing deadline for appeals of Planning Commission decisions to the Board of County Commissioners. It is clear that the Developers have failed to timely file their appeal and have failed to show good cause for not complying with the filing deadline in this matter. Therefore, the Developers have waived their right to an appeal and have failed to properly exhaust their administrative remedies. The Developers' disregard of county procedure and deadlines also prejudice the Appellants by

² Compare this response time with that provided to Developers for responding to Appellants' appeal of the Planning Commission Decision: Because the Appellants timely filed their appeal by the January 25, 2017 deadline the Developers had thirty-six (36) days to respond to the Appellants' appeal. *See* the Developers' Response to Appellants' Appeal dated March 2, 2017.

providing insufficient notice and response time to the untimely appeal. For these reasons the Board should dismiss the Developers' untimely appeal.

Dated: March 8, 2017.

NEW MEXICO ENVIRONMENTAL LAW CENTER

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

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Attorneys for the Appellants

Certificate of Service

I certify that on March 8, 2017 copies of this “Response in Opposition To and Motion to Dismiss Santolina Developers’ Appeal of the County Planning Commission Decision Finding #19 and Conditions #5 and #6” were sent by electronic mail to:

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*Attorney for the South Valley Coalition
of Neighborhood Associations*



Jaimie Park



County of Bernalillo
State of New Mexico

Planning and Development Services
111 Union Square SE, Suite 100
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NOTICE OF APPEAL

December 23, 2014

COMMISSIONERS

Debbie O'Malley, Chair
District 1

Art De La Cruz, Vice Chair
District 2

Maggie Hart Stebbins, Member
District 3

Lonnie C. Talbert, Member
District 4

Wayne A. Johnson, Member
District 5

COUNTY MANAGER

Tom Zdunek

ELECTED OFFICIALS

Tanya R. Giddings
Assessor

Maggie Toulouse Oliver
Clerk

Willow Misty Parks
Probate Judge

Dan Houston
Sheriff

Manny Ortiz
Treasurer

To Whom It May Concern:

The following appeal has been filed with the Bernalillo County Planning and Development Services:

APPEAL NO: ZCOA2015-0005 ORIGINAL CASE NO: SPR-20130004

APPELLANT: Name: Western Albuquerque Land Holding LLC

Address: 6991 E. Camelback Road, Suite B297, Scottsdale, AZ 8525

REASON FOR APPEAL: See Attached

SCHEDULED FOR PUBLIC HEARING BEFORE THE BOARD OF COUNTY COMMISSIONERS ON:

Tuesday, February 19, 2015 at 1:30 P.M., at the Vincent E. Griego Chambers, Concourse Level II, One Civic Plaza, NW.

You and all other interested parties are invited and urged to be present at this hearing.

Applicants, agents and those in support or opposition to a request are now required to submit all evidence and presentation materials to the Board of County Commissioners (BCC) through the staff.

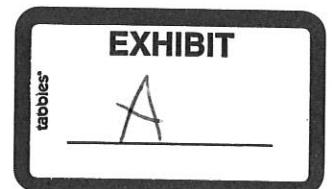
Es necesario traer un interprete si no habla ingles o puede llamar a Miriam Aguilar al 314-0369.

If you have any questions, please do not hesitate to contact me at 314-0385.

Sincerely,

ENRICO GRADI

Enrico Gradi
Community Development Manager





County of Bernalillo
State of New Mexico

Planning & Development Services
111 Union Square SE, Suite 100
Albuquerque, New Mexico 87102
(505) 314-0350

APPLICATION

SITE ADDRESS/LOCATION

0 NA, ****DO NOT EDIT*****

PERMIT NO: ZCOA2015-0005

Printed: December 18, 2014

PROPERTY OWNER

WESTERN ALBUQU LAND HOLDINGS LL
PO BOX 56790
ALBUQUERQUE, NM 87187

UPC

100205525821640201

LEGAL DESCRIPTION

TR 210 ROW 1 UNIT B WEST OF
WESTLAND LESS POR OUT TO R/W CON
T 3.62 AC $\frac{1}{2}$ OTHERS INCLUDING THE SITE

AGENT

Fees Paid: \$100.00

Description: Appeal of SPR-20130004

AGENT: Rodey Law Firm (John Salazar)

I HEREBY CERTIFY THAT I HAVE READ AND EXAMINED THIS DOCUMENT AND
KNOW THE SAME TO BE TRUE AND CORRECT. ALL PROVISIONS OF LAWS AND
ORDINANCES GOVERNING THIS TYPE OF WORK WILL BE COMPLIED WITH
WHETHER SPECIFIED HEREIN OR NOT. GRANTING OF A PERMIT DOES NOT
PRESUME TO GIVE AUTHORITY TO VIOLATE OR CANCEL THE PROVISIONS OF
ANY OTHER STATE OR LOCAL LAW REGULATING LAND USE.

Signature: _____

(Applicant/Owner Or Authorized Agent)

12/18/14

Date

Approved By: _____

(ZBP Staff)

12/18/2014

Date

RODEY, DICKASON, SLOAN, AKIN & ROBB, P. A.

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SCOTT D. GORDON
NELSON FRANSE
THERESA W. PARRISH
PAUL R. KOLLER
CHARLES J. VIGIL
THOMAS L. STAHL
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SUNNY J. NIXON
JEFFREY L. LOWRY
R. TRACY SPROULS
DONALD B. MONNHEIMER
ALAN HALL
THOMAS A. OUTLER
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MICHAEL J. BRESCIA
AARON C. VIETS
KURT B. GILBERT
RICK BETTLER
JUSTIN A. HORWITZ
SANDRA L. BEERLE
JENNIFER L. STONE
VALERIE REIGHARD DENTON
BRENDA M. SAIZ
BRIAN P. BRACK
TODD E. RINNER
CHARLES R. HUGHSON
JOSE R. BLANTON
CRISTINA A. ADAMS
MICHAEL E. KAEMPER
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TYLER M. CUFF
KEVIN J. BANVILLE
DENISE M. CHANEZ
ROBERT J. SANCHEZ
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WRITER'S DIRECT NUMBER
(505) 768-7220

JSAZAZAR@RODEY.COM

December 18, 2014

Via Hand Delivery

Bernalillo County Commission
c/o Bernalillo County Planning Department
111 Union Square SE, Suite 100
Albuquerque, NM 87102

Re: **Western Albuquerque Land Holdings LLC
SPR-20130004 / Appeal of Certain Findings and Portions of Findings and Certain
Conditions and Portions of Conditions Adopted on December 3, 2014, by the
County Planning Commission in Connection With its Recommendation of Approval
of the Santolina Level A Community Master Plan**

Gentlemen:

We attach herewith the referenced appeal of Western Albuquerque Land Holdings LLC in the above-referenced matter. This appeal is being submitted on the 18th day of December 2014 pursuant to and in accordance with the provisions of the Bernalillo County Zoning Ordinance, which provides at Section 25.E (Appeals) that:

Appeal of any denial or approval of an application by the Bernalillo County Planning Commission must be submitted in writing to the Board of County Commissioners by noon on the 15th day after the date of the determination by the Bernalillo County Planning Commission.

We understand the date of the determination made by the Bernalillo County Planning Commission to be December 3, 2014. Therefore, the expiration of the appeal period would be noon today, December 18, 2014.

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

Bernalillo County Commission
c/o Bernalillo County Planning Department
December 18, 2014
Page 2

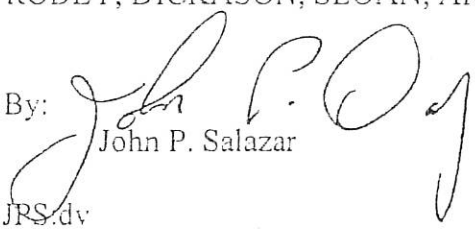
We trust that we have complied with the appeal deadline provisions of the Bernalillo County Zoning Ordinance.

Thank you for accepting our appeal and for your consideration therewith.

Sincerely,

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

By:


John P. Salazar

JPS/dv

Enclosure

cc (w/ enc.):

Western Albuquerque Land Holdings LLC

BERNALILLO COUNTY

Planning & Development Services
 1 Union Square SE, Suite 100
 Albuquerque, NM 87102
 (505) 314-0350 Fax: (505) 314-0480
 www.bernco.gov



ZONING SECTION

APPEAL TO COUNTY COMMISSION

Application Date: 12/18/2015
 Application Number: ZCOA2015-0005
 Hearing Date: 2/19/2015

OWNER/ APPLICANT FOR LAND USE REQUEST Western Albuquerque Land Holdings LLC		PHONE (480) 970-4001
MAILING ADDRESS 6991 E. Camelback Road, Suite B297	CITY Scottsdale, AZ	ZIP 85251

AGENT (FOR APPELLANT) Rodey Law Firm (John P. Salazar)		PHONE (505) 768-7220
MAILING ADDRESS P.O. Box 1888	CITY Albuquerque	ZIP 87103-1888

APPELLANT Western Albuquerque Land Holdings LLC		PHONE (480) 970-4001
MAILING ADDRESS 6991 E. Camelback Road, Suite B297	CITY Scottsdale, AZ	ZIP 85251

SITE ADDRESS South of I-40, west of 118th Street, east of Rio Puerco Valley, north of Pajarito Mesa	Case # SPR-20130004
--	------------------------

DIRECTIONS
 South of I-40, west of 118th Street, east of Rio Puerco Valley, north of Pajarito Mesa

LEGAL DESCRIPTION
 See **Attachment 1**.

ZONE MAP PAGE L1-L8; M1-M8; N1-N8; P1-P9; and Q1-Q9	CURRENT ZONE(S) Primarily A-1 Some M-1, C-LI, C-1	PROPERTY SIZE IN ACREAGE approximately 13,851
UPC # See Attachment 2 .	PROPOSED ZONE(S) PC	SUBDIVISION NAME Santolina

CASE # & SCOPE OF APPEAL Case No. SPR-20130004. This is an appeal of certain Findings and portions of Findings and certain Conditions and portions of Conditions adopted on December 3, 2014, by the County Planning Commission in connection with its recommendation of approval of the Santolina Level A Community Master Plan.

DETAILED INFORMATION See **Attachment 3**, which sets forth the reasons for objections to specified Findings and portions of Findings and specified Conditions and portions of Conditions adopted on December 3, 2014, by the County Planning Commission in connection with its recommendation of approval of the Santolina Level A Community Master Plan. **Attachment 4** is a redline document which indicates Santolina proposed revisions to the County Planning Commission adopted Findings and Conditions. **Attachment 5** is a clean copy of the adopted Findings and Conditions with Santolina proposed revisions incorporated therein.

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.

Rodey Law Firm, Agent for Owner/Applicant
 by: John P. Salazar
 Printed Name

John P. Salazar
 Signature

12/18/2014
 Date

Jaimie Park

From: Catherine VerEecke [cvereecke@berncogov]
Sent: Monday, March 06, 2017 9:52 AM
To: Jaimie Park; dmeiklejohn@nmelc.org
Cc: Enrico Gradi; Michael I. Garcia
Subject: FW: SPR 2016-0001 (Santolina): Memo to BCC Regarding Conditions #8, #9, and #11
Attachments: Rodey Memo to BCC regarding Conditions 8, 9 and 11.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning, I'm not sure if you received these requests from the applicant in addition to the response to your appeal and request for deferral. Here's the first for Level A conditions. The second for Level B conditions will be in the next e-mail. If you have any questions, let me know. Any additional documents to be added in the BCC packet are due Thursday morning in time to allow processing for the noon deadline. Thanks,

Catherine VerEecke, Planning Manager
Planning and Development Services
Bernalillo County
505-314-0387

From: Dina Venn [mailto:DVenn@rodey.com]
Sent: Thursday, March 02, 2017 4:11 PM
To: Catherine VerEecke <cvereecke@berncogov>
Cc: John Salazar <JSalazar@rodey.com>
Subject: SPR 2016-0001 (Santolina): Memo to BCC Regarding Conditions #8, #9, and #11

Ms. VerEecke,

Attached for submission into the record in the referenced matter is this firm's memorandum to the Bernalillo County Commission, dated March 2, 2017, regarding Santolina Level A Master Plan Approval Conditions #8, #9 and #11.

We understand that the attached memorandum will be included in the BCC staff report for the March 14, 2017, BCC meeting.

Thank you for your attention to this matter.

Dina R. Venn | Legal Assistant
to John P. Salazar

dvenn@rodey.com
505.768.7369

