



## **12/10/2013 BCC Meeting**

Madame Chair, Commissioners:

As you know, the League has consistently urged the Board to adopt a strong Land Development Code in a timely fashion. Although we support adoption of the code today, we urge you to approve the following amendments.

- 1) Reverse global changes of “must” to “shall” and of “shall” to “may.” These changes weaken the code.
- 2) Remove the phrase “not subject to the SLDC” from paragraph 1.11.7 to clarify that only the lot creation is grandfathered.
- 3) Add back a sentence that was deleted from the adoption draft in paragraph 6.6.4.9: “Access roads shall be sited in a manner that mitigates or minimizes the impact on the environment and neighboring land uses.”
- 4) Delete paragraph 7.6.8.4.3, which allows supplemental potable water use for irrigation.
- 5) Change the distance requirements in Tables 7-17 and 7-18 for hooking up to the county water/sewer system or to another public system back to the original distances in the October adoption draft. The current shorter distance requirements will result in more wells and groundwater use. This conflicts with the SGMP goal of maximizing use of surface water via existing infrastructure.
- 6) Clarify the phrase “gardens or agricultural uses” in paragraph 7.13.11.2.5. As it currently stands, the limits on irrigation hours and the requirement for a rain sensor are meaningless because “garden” can be interpreted to cover an entire property.

The League thanks you and county staff members for your efforts to put in place a meaningful land development code for Santa Fe County.

**12/3 BCC public hearing: - revised at the meeting**

Madame Chair, Commissioners:

As you know, the League has supported adoption of the Sustainable Growth Management Plan and has consistently urged the Board to adopt a strong Land Development Code in a timely fashion. We have not changed that position.

At the public hearing on Nov. 19, however, we learned of proposed amendments to the adoption draft that we believe will substantially weaken the code. And, although we have not had a chance to exhaustively review today's changes, some of those changes also raise concerns.

- 1) The changes proposed to Tables 7-17 and 7-18 on 11/19 significantly relax the requirements for hooking up to the county water/sewer system or to another public system. This change conflicts with the goals of maximizing use of surface water via existing infrastructure and, correspondingly, of limiting the number of wells and use of groundwater. The League opposes these proposed changes.
- 1) The adoption draft limited single-family dwellings to .25 acre-foot of water per year for indoor and outdoor use (7.13.11.1.2). On 11/19 that was changed to indoor use only. It now says .25 acre feet for 'domestic' use, which is not clear. Why not change it back to 'indoor and outdoor' if that's the intent?
- 1) Under Outdoor Conservation (7.13.11.2), the last sentence says the limits on irrigation hours and the requirement for a rain sensor do not apply to gardens or agriculture. The word garden is non-specific and needs to be clarified; otherwise there are effectively no limits on irrigation.

Thank you again for the opportunity to express our positions.

## **Statement at 11/19 BCC public hearing:**

Madame Chair, Commissioners:

As you know, I emailed each of you a letter earlier today on behalf of the League. In it we asked you to vote to approve the SLDC at your December 10 meeting and to proceed to approval of the zoning map as soon as possible.

However, having now seen the proposed amendments to the adoption draft, we want to raise our initial concerns about selected specific changes:

- The changes significantly relax the requirements for hooking up to the county water/sewer system or to another public or publicly-regulated system. That goes against the goal of using existing infrastructure as much as possible. The League opposes this weakening of requirements to use existing infrastructure.
- Excluding outdoor use from the .25-acre foot household water usage standard is a significant change. It would seem to make monitoring or enforcement of the standard difficult if not impossible. Note that there is also a change that would allow potable water to be used for irrigation if non-potable sources are insufficient. These changes essentially dismantle the water usage standard. The League opposes weakening the standards for water usage.
- The requirement that access roads be sited to mitigate or minimize impacts on the environment and/or surrounding development has been removed. Again, this weakens the code.

We want to add that we understand no document of this complexity can be perfect. Also, we know we cannot expect unanimous agreement on every detail.

Finally, we want to say that we continue to appreciate the open and democratic process the county has followed throughout this entire process.

Thank you.

**Statement at 10/15 BCC study session:**

Madame Chair, Commissioners:

My name is Chris Furlanetto; I am currently Vice President and Action & Advocacy Chair of the LWVSFC.

The League has long advocated for timely approval of a strong Sustainable Land Development Code that is true to the Sustainable Growth Management Plan adopted in 2010. We are very pleased that the adoption draft has been released and that both Board study sessions and public information sessions have been scheduled over the next few weeks.

We sincerely thank the county staff involved in this project for their hard work and dedication in preparing the original draft, reviewing the comments submitted by the public, and producing the adoption draft.

We continue to ask that you approve the code in this calendar year so that the SGMP can be fully implemented.

Thank you.