

Chapter 1- Introduction: SLDP Final Recommendations Summary

Public Comment	Staff Evaluation	Staff Recommendation
<p><b>The 2010 SLDP Final Draft’s proposed “Binding Principles” are unnecessary and questionable as the basis for consistency determinations under the New Mexico statutes.</b>  <b>Recommendation:</b> The Association requests that the County reconsider the need for the Binding Principles as they appear to be redundant with other, more specific, goals and policies within the plan. The Association asks the County on what basis it believes it has the authority to create and use “Binding Principles” as the basis for consistency determinations. The Association also requests that the Binding Principles identified in this memorandum be appropriately rephrased, if they are going to remain in the SLDP.</p>	<p>The principles of the SLDP do not need to be “binding” as this may indicate to some that we are trying to authorize consistency determination and a legal framework.</p>	<p>Specify that the principles are guidelines rather than binding or mandates.</p>

Chapter 12-Adequate Public Facilities & Financing Element: SLDP Final Recommendations Summary

Public Comment	Staff Evaluation	Staff Recommendation
<ul style="list-style-type: none"> <li>One problem with this chapter is that it is disorganized and poorly written. There are several sections that appear to be largely redundant of one another.</li> <li>The 2010 SLDP Final Draft does not provide sufficient recognition and explanation of how these multiple regulatory tools will be coordinated in addressing the APF financing.</li> <li>The 2010 SLDP Final Draft lacks sufficient explanation of how all of the regulatory tools proposed under the <i>Adequate Public Facilities and Financing Element</i> will be coordinated to ensure that they are fairly applied</li> </ul> <p><b>Recommendation:</b> The Association requests that the entire Chapter 12 be revised to make it more concise and comprehensible. The Fiscal Impact Analysis and Costs of Sprawl sections should be revised to add better supporting data and documentation (in the form of footnotes or in a references section7) and to better integrate them with the rest of the chapter. The discussion of the regulatory tools for APF planning and financing, and the accompanying policies and strategies, should all be revised to demonstrate a more coordinated and integrated approach to APF financing that will ensure that APF financing requirements will be applied equitably to new development in the County.</p>	<p>Chapter 12 should be revised to make it more concise and comprehensible. The Fiscal Impact Analysis and Costs of Sprawl sections should be revised to add better supporting data and documentation (in the form of footnotes or in a references section7) and to better integrate them with the rest of the chapter.</p>	<p>Revise chapter 12 in conjunction with appropriate consultants and sources of information so that it is concise and comprehensible to the general public.</p>
<p><b>Policy 40.6 requiring that the APF assessment “ensure that the cumulative impacts of development are measured and considered,” is undefined as to scope and the 2010 SLDP Final Draft does not provide any guidance as to how “cumulative impacts of development” are to be “measured and considered.”</b></p> <ul style="list-style-type: none"> <li>The SLDP does not contain any limitations on the evaluation of these impacts, nor does it provide any guidance on how they are to be measured and considered.</li> </ul> <p><b>Recommendation:</b> The Association requests that the requirement to measure and consider the “cumulative impacts of development” be eliminated from the 2010 SLDP Final Draft.</p>	<p>The requirement to measure and consider the “cumulative impacts of development” should be reviewed for revision or elimination from the SLDP.</p>	<p>Review section on cumulative developments, clarify and revise.</p>
<p><b>Policy 41.1 requires that new development provide for and finance improvements consistent with the degree of impact to public services and/or infrastructure indirectly attributed to the project, may not be authorized under the New Mexico statutes.</b></p> <ul style="list-style-type: none"> <li>The 2010 SLDP Final Draft provides no additional description of how to assess indirect impacts of a development project or how the cost of such impacts would be calculated.</li> </ul> <p><b>Recommendation:</b> The Association requests that the requirement that a developer address impacts that are “indirectly” attributed to a project be removed from Policy 41.1.</p>	<p>The requirement that a developer address impacts that are “indirectly” attributed to a project be reviewed for modification or elimination from the SLDP</p>	<p>Indirect impacts from development may be difficult for a developer to address. Specify specific impacts that can be addressed or eliminate this section from the SLDP.</p>
<p><b>The 2010 SLDP Final Draft’s explanation of levels of service for the Adequate Public Facilities program is inadequate and confusing.</b></p>	<p>The County should address the shortcomings in the Adequate Public Facilities Program and clarify its analysis and discussion of public facilities levels of service, in order to provide a better understanding of the County’s existing levels of service and the potential consequences of imposing newly adopted levels of service in the adequate public facilities program.</p>	<p>Review section on levels of service to address shortcomings, clarify analysis process incorporated in the narrative. Correlate information with existing levels of service and relate discussion to outcome of future levels of services to be incorporated as per implementation of the SLDP.</p>
<p><b>The 2010 SLDP Final Draft proposes consistency review requirements that are potentially burdensome.</b></p> <p><b>Recommendation:</b> The Association requests that the County eliminate the requirement that decisions on development applications be made subject to individual consistency reviews, given that the 2010 SLDP Final Draft requires consistency for all ordinances, maps and regulations, which obviates the need to re-evaluate a proposed project for consistency with the SLDP.</p>	<p>The County should evaluate the requirement that decisions on development applications be made subject to individual consistency reviews.</p>	<p>Check with legal regarding the need for individual consistency reviews.</p>

Chapter 2-Land Use: SLDP Final Recommendations Summary

Public Comment	Staff Evaluation	Staff Recommendation
<p>The 2010 SLDP Final Draft’s analysis of future growth in the County is based on what appears to be questionable data.</p>	<p>The County should also incorporate into the 2010 SLDP Final Draft a discussion of the Pitts study and the assumptions which form the basis of the County’s population and housing projections. This data is based on the most appropriate data from studies from the County demographer. This accounts for the unincorporated areas of the County and that they also, particularly, account for the annexation of land around the City of Santa Fe.</p>	<p>No change. Data is best data available.</p>