

**ATTACHMENT 9**  
**BCC Packet**

**Coalition of Six Middle Rio Grande Basin Pueblos**  
**c/o Councilman Stuart Paisano, Chairman**  
Pueblo of Sandia, 481 Sandia Loop, Bernalillo, New Mexico 87004  
(505) 867-3317, Fax (505) 867-9235

February 3, 2017

Via email

Bernalillo County Board of Commissioners  
[Commission@bernco.gov](mailto:Commission@bernco.gov)

Re: Proposed Santolina Development Project

Dear Commissioners O'Malley, Quezada, Stebbins, Talbert, and Johnson:

I write on behalf of the Coalition of Six Middle Rio Grande Pueblos, which is comprised of the Pueblos of Cochiti, Santo Domingo, San Felipe, Santa Ana, Sandia and Isleta, to urge that the Commission reject the proposed Level B Master Plan for a 4,243 acre portion of the proposed Santolina development. As sovereign governments ourselves, we recognize the importance of economic development; however, we submit that there are far less costly and far more environmentally sensitive ways to foster economic growth than creating Santolina. While only two of the six Pueblos have lands within Bernalillo County, all six Pueblos share the water resources of the Middle Rio Grande and want to see those limited water resources prudently managed. Our ties to the Middle Rio Grande stem from our Pueblos' time immemorial use of the waters. In contrast, the entity proposing the Santolina development is a Delaware limited liability (Western Albuquerque Land Holdings, LLC), the principal member of which is Barclays, a London-based international bank, and it is managed by a Scottsdale, Arizona company, Garrett Development Corporation.

A 2015 article by the British newspaper, *The Guardian*, which reported on the development due to its connection with Barclays of London, described Santolina as a "bizarre mega-development" based on "build[ing] an entirely new city in the middle of the desert, just west of Albuquerque . . . on a field of sand dunes." That description is an apt one and we are deeply concerned about the urban sprawl the Santolina development will cause, along with the road congestion, air pollution, neglect of existing neighborhoods, and water shortages that will result. We question the need for such a development when there are already several master planned communities that have been largely stagnant for at least a decade, including a development just across I-40 from Santolina and the much-heralded Mesa del Sol. These developments still have thousands of acres yet to be developed. For example, Mesa del Sol is a 12,900 acre master planned community that, like Santolina, includes large acreages designated for business and commercial development, and is eventually slated to have 37,500 homes. A decade after its inception, Mesa del Sol contains only a couple of businesses and less than 200 homes. As the lead story in the Sunday, January 29<sup>th</sup> *Albuquerque Journal* observed, "people are leaving New Mexico in unprecedented numbers, particularly younger adults and shorter-term

residents,” because the state “remains stubbornly at the wrong end of several quality-of-life indicators,” not because we lack for homesites or places for businesses to locate. We also note there remains a substantial amount of land within Albuquerque’s core, like the Albuquerque Indian School area and the nearby Sawmill district, both of which are actively developing. This type of urban in-fill development, happening in other cities, makes obvious sense here.

It is unclear to us why Bernalillo County would favor taking on the added burden of providing governmental services to a new, isolated development when the County has struggled in recent years to avoid a budget shortfall by cutting expenses. Such cuts invariably impact County services, including law enforcement, emergency medical services, road construction and maintenance, economic development initiatives, and parks and recreation. It is thus not surprising that the County has an estimated \$450 million in unfunded capital infrastructure needs. Further, it is our understanding that the Santolina developers now have the County and state helping subsidize their development costs through the authorization and creation of tax increment development districts or TIDDs. As authorized by the Commission, we understand that the TIDDs would result in an estimated \$500 million of Santolina’s development costs being repaid to the developer by diverting property and gross receipts taxes generated from the development. At a time when there are so many other outstanding unmet needs, we simply do not see the benefit of such an arrangement where the larger community ultimately will be burdened by these additional obligations and costs, particularly where there is no evident need for the development.

In addition, the Coalition is deeply concerned about the adequacy of the water supply to serve such a large development, which we note is outside the Albuquerque Bernalillo County Water Utility Authority’s (ABCWUA) current service area. At full development Santolina is projected to require 14,380 acre feet per year, a quantity that is 1.5 times the City of Santa Fe’s annual use and approximately what Rio Rancho’s current use is. Yet we understand that Santolina’s developers have no water rights. They have not shown a legal right to any water (much less 14,000 acre feet), nor have they demonstrated that sufficient water is physically available.

The Middle Rio Grande basin is over-appropriated. Moreover, climate change is likely to adversely impact surface water supply, and it is critical we maintain a living river and bosque. Given existing and future water scarcity concerns, a development proposal that involves pumping 14,000 acre feet of water up to a sandy bluff simply makes no sense. In addition, and of utmost concern to the Coalition, how can the ABCWUA commit to supplying such a quantity when the water rights of the Six Middle Rio Grande Pueblos, the most senior in the basin, as well as the rights of other relatively senior users, have not yet been adjudicated? Though the ABCWUA asserted in a 2014 letter that it “is capable of serving the master planned community,” this letter begs the key policy, technical, and legal questions associated with the proposed development. For example, does the ABCWUA have sufficient (both in quantity and priority) water rights to serve the enormous proposed development? Is it an efficient use of water? Is it an efficient use of the ABCWUA’s financial and infrastructure resources to extend service to the remote, windy and sandy Santolina area? We also are concerned about how Santolina’s pumping will increase depletions in the Middle Rio Grande and how those cumulative depletion impacts will be mitigated for the endangered Rio Grande silvery minnow.

While we acknowledge that we are coming late to this debate, the Coalition Pueblos are perplexed as to why there has not been more publicity and basic scrutiny of the proposed Santolina development, including how its promoters have pursued County approval. We were disturbed to read reports of the substantial political contributions made by Santolina's out-of-state promoters in what appears to be an obvious effort to garner Commission support. We urge everyone who lives in, or cares about, the Middle Rio Grande area to find out for themselves about the proposed Santolina development, and to express their views to each of you and to our state legislator.

In closing, I want to quote a sentence from the recent book *Reining in the Rio Grande, People, Land and Water* by New Mexico Tech Professor Fred Phillips, UNM Law School Professor Emlen Hall and author Mary Black:

"The future of the Rio Grande valley will depend to a great extent on whether the prevailing voices are those of individuals who will ultimately profit handsomely from great projects that contribute to growth or are those of residents who are concerned about the long-term sustainability of the valley."

The proposed Santolina development is great only in the sense that it is enormous in size and scale, so big that it seems destined, if approved, to become another zombie development on the area's western sandy hills. And it is a foreign bank, not individuals, that stands to profit if Santolina is approved and funded by tax revenues. We need to avoid repeating past mistakes. As *The Guardian* article on the proposed Santolina development observed: "Like many American cities, as Albuquerque spread outward in the mid-20<sup>th</sup> century, its downtown fell into decline...Because land is cheaper and taxes lower outside of the city limits, sprawl has been the dominant paradigm." Likewise, the City and County's former planner, Paul Lusck, describes Santolina as "a vestige of 20<sup>th</sup> century thinking," reflecting "the same dot-dot-dot housing, green lawn, drive-to-work development that got us into this on-going, environmentally degrading pattern of separated land use."

The six Middle Rio Grande Pueblos are not opposed to growth, but growth must be well conceived and in concert with the sustainability of the valley, including its limited water resources. Santolina is neither.

Sincerely,



Stuart Paisano, Chairman  
Coalition of Six Middle Rio Grande Basin Pueblos

**Cc (via email):** Governor Malcolm Montoya, Pueblo of Sandia  
Governor J. Robert Benavides, Pueblo of Isleta  
Governor Eugene Herrera, Pueblo of Cochiti  
Governor Brian Coriz, Pueblo of Santo Domingo  
Governor Anthony Ortiz, Pueblo of San Felipe  
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To: The Bernalillo Board of  
County Commission

From: Judy Kaul

(505) 242-5806



I strongly object to  
approval of the Santolina  
planned Community Development.

Thank you for your  
consideration.

Judy Kaul