

# SUMMIT LAND MANAGEMENT

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**TO:** Mr. Rick Miller – City of Coolidge

**FROM:** Chris Webb on behalf of Property Reserve, Inc. *aw*

**DATE:** April 28, 2014

**SUBJECT: City of Coolidge General Plan Update – 60-Day Review Draft: Comments**

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Rick,

Thank you again for taking the time to meet with us earlier this month to discuss the 60-Day Review Draft of the City's General Plan Update. As a follow up to that conversation, the following review comments are provided to the City on behalf of Property Reserve, Inc. ("PRI"), a subsidiary of the Corporation of the Presiding Bishop of the Church of Jesus Christ of Latter-day Saints ("CPB"), and the owner of approximately 3,350 acres within the City's planning area. We would be happy to discuss any of these comments with you in greater detail.

1) In general, the 60-Day Review Draft contains a number of very specific development standards that certainly appear to be outside of the authority and scope of General Plans as prescribed by state statute. Such standards should instead be incorporated into the City's Zoning Ordinance or various stand-alone design guideline documents. Inclusion of these development standards in the General Plan will result in the need for the City to process numerous General Plan amendments due to developers and landowners needing to vary from development standards that would typically be addressed only through the rezoning process, via a PAD. Examples of such development standards within the 60-Day Review Draft are as follows:

- a. Chapter 2 Land Use Element: Agriculture – Page 21: Maximum Lot Coverage, Maximum Building Height
- b. Chapter 2 Land Use Element: Rural Ranchette – Page 23: Maximum Lot Coverage, Commercial FAR
- c. Chapter 2 Land Use Element: Rural Ranchette – Page 24: View Fencing Standards
- d. Chapter 2 Land Use Element: Rural Ranchette – Page 25: Setbacks and Open Space Standards for Commercial Uses
- e. Chapter 2 Land Use Element: Urban Neighborhood – Page 28: Commercial FAR, Specific Density & Acreage Thresholds

- f. Chapter 2 Land Use Element: Urban Neighborhood – Page 29: Open Space Standards, Shade Structure Requirements
- g. Chapter 2 Land Use Element: Business & Commerce – Page 36: Open Space Standards
- h. Chapter 4 Open Space Element: All specific standards

2) The 60-Day Review Draft contains a number of very specific and restrictive acreage and density thresholds for various use types. These are contained in Chapter 2 Land Use Element, Urban Neighborhood (Page 28) and Business & Commerce (Page 36). While the General Plan certainly needs to address density and intensity standards, it should also provide enough flexibility to avoid numerous amendments and accommodate a variety of development scenarios. If the City determines that such thresholds are needed in the General Plan, we suggest adding language to establish them as general guidelines only and indicate that the requirements of the Zoning Ordinance will govern. This will allow flexibility in development and avoid numerous amendments to the General Plan.

3) The 60-Day Review Draft contains a section dealing with aggregate locations and compatible land uses as required by state statute. However, as written, we believe this section (Chapter 2 Land Use Element, Page 42) may have the unintended consequence of preventing residential development in appropriate locations within the City. In general, the mining operations should be viewed as a temporary activity. Rather than identifying “Designated Aggregate Extraction Zones”, we suggest simply identifying the existing mining operations on the map (in accordance with state statute) and outlining a policy to prevent incompatible development. To that end, the language below Figure 2.3 on Page 42 could be revised as follows:

*“The City of Coolidge recognizes that future sand and gravel operations are possible along the Gila River and has identified existing operations in this area. The City will carefully review any development plan for private property adjacent to active aggregate mining operations and will develop land use policies to avoid incompatible land uses, by providing equal protection for active aggregate mining operations and residential development;*

*The City will discourage the construction of new residential development where future residences would be adjacent to an active aggregate mining operation. New residential zoning may be allowed adjacent to, or coinciding with, active mining operations, but may not proceed to development until such mining operations have permanently ceased.*

*The City will discourage new mining operations adjacent to or in close proximity to existing or planned residential development or existing or planned City recreation areas.*

*The City will promote non-residential development such as business-park, commercial and industrial uses adjacent to active mining operations, where such mining operations are not required to cease upon development of the adjacent property.”*

4) The 60-Day Review Draft provides guidelines for major vs. minor General Plan amendments, which do not include any acreage thresholds. Given that the land use designations shown on the General

Plan Land Use Map do not necessarily follow ownership or parcel boundaries, it is very likely that numerous amendments will need to be processed by the City along the boundary lines between land use designations, as acreages are adjusted for specific uses and projects. We suggest making some provision for changes along such boundary lines to be handled via a minor General Plan amendment. Perhaps an acreage threshold for these situations could be established (maybe 40 acres).

5) Would there be any benefit in showing the Intercity Rail alignment and potential station location on the Transportation Plan Map on Page 53 of the Circulation Element?

6) In general, Chapter 4 Open Space Element contains numerous specific open space standards and guidelines that really belong in the City's Zoning Ordinance or in a stand-alone set of open space guidelines. Keeping such standards in the General Plan will result in the City having to process numerous General Plan amendments for projects that wish to deviate from open space standards which would otherwise be handled via a PAD during the rezoning process. Examples of such development standards within Chapter 4 are as follows:

- a. Page 65 – Specific park size requirements and required distances from home.
- b. Page 65 – Specific trail type and width requirements.
- c. Page 65 & 67 – Specific amenity program and requirements for parks.
- d. Page 71 – Specific open space percentage requirements and thresholds