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SENT VIA ELECTRONIC MAIL

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Rick Miller
Growth Management Director
City of Coolidge
131 W. Pinkley Avenue
Coolidge, Arizona 85228

Re: Proposed Comments to City's Draft General Plan 2025

Dear Rick:

Congratulations on compiling such a great proposed Draft General Plan for the City of Coolidge (the "City"). The Draft is excellent and the City will be greatly benefitted once it is implemented. We strongly agree with the goal of simplifying while at the same time improving the effectiveness and efficiency of the Plan. Despite our overwhelming support of the document I trust you will understand that in a Draft of this size and scope it is not surprising to find a few items that might need to be addressed in a revision. On behalf of Walton Development and Management (Walton), the following comments are offered to better what we believe to already be an excellent Draft.

Our comments stem from one simple proposition; General Plans should be just that; general. In fact, it appears that the overriding goal of this new draft Plan was to make it much more general. In a few places in the Plan we believe the City would benefit by removing some of specificity that can hamper flexibility in the future for the benefit of the City. As you know, General Plans are designed to be high level policy documents that guide community growth and development decisions, whereas the Zoning Ordinance, Subdivision Regulations, or Design Guidelines, define with significant precision the specific development and design standards for every property within a City's jurisdiction. These specific ordinances and regulations address the unique characteristics and support distinct land use planning and implementation strategies for each specific area.

The following specific comments point out the few places in the Plan where we believe the City could benefit by keeping the Plan more general. Our concern is that too much specificity in the General Plan ties the hands of the City by limiting its ability to implement communities that make sense in the right time and place. For example, it may make sense in certain circumstance to have the ability to have a greater floor area ratio than that set forth in the General Plan. However, because such a requirement is set out in the Plan, it could prevent a

proposal for the betterment of the community from moving forward because of the rigidity of provisions set forth in General Plans. If a provision is set out in Design Guidelines or Zoning Ordinances, the Council could approve deviations on a case by case basis after examining the totality of a project's benefits to the community. In contrast however, if a provision is in the General Plan then there is no legal possibility of deviating from such requirement without amending the General Plan itself.

Comments:

Page 21, 23, 40 Density and Intensity

“Maximum lot coverage
Maximum Building Height
Commercial Floor Area Ratio”

Including maximum lot coverage. FAR and building height, in the General Plan appears unnecessarily specific. We recommend removing these references altogether or if they must stay, we recommend clearly identifying them as “targets” and then including the following language as a catchall to explain that future deviations will not trigger a requirement of a General Plan Amendment. We recommend including the following: “numbers identified as “targets” in this Plan are not intended to be binding restrictions but are instead offered as examples of vision for the areas described. Proposals that fall outside of any “targets” offered in the Plan will still be deemed consistent with the General Plan and will be able to be heard without the need for a General Plan Amendment of any kind.”

Page 24 Land Use Form and Design

“Rear and side yard walls shall be a minimum 50% view fencing.”

See previous comment. This requirement, while it may be rational, if included in the Plan will not allow for much flexibility. We would recommend it be a suggested feature and subject to the “target” language described above, or insert this detailed language in the Zoning Ordinance and remove from the General Plan.

Page 28 – Density and Intensity (Commercial)

“Permit neighborhood and community commercial and service development on single sites up to 30 acres.”

We would recommend this threshold be raised to 40 acres to accommodate a typical commercial project that might be adjacent to single family residential neighborhoods. A rule of thumb for commercial development is that you can build 10,000 square feet of retail per acre, so 40 acres would be most ideal.

“Permit horizontal and vertical mixed-use retail/office/residential developments on sites up to 40 acres (residential 30 percent maximum of total site area, commercial Floor Area Ratio (FAR) 0.35 maximum). Commercial development shall have a maximum FAR of 0.35.”

We believe this target FAR is too low and should be raised. In addition, we believe this target number should be subject to the flexibility set out in the language suggested in our first comment above. Deviations from this restrictive number must not require amendments to the General Plan.

Page 29 – Spatial Form and Design (Commercial)

“Shade structures that will be provided through either trees or building elements and cover at least 25 percent of the public and private sidewalks.”

We would recommend that this language be inserted in the Zoning Ordinance as it may require flexibility for unique development circumstances.

Page 65 – Open Space (Community Parks)

“A community park will be required to provide a minimum of three (3) items from Category 1, four (4) items from Category 2, and five (5) items from Category 3 as listed in the Parks Amenities Table”

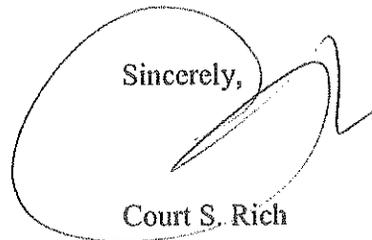
Including this level of detail for park programming is not commonly found in a General Plan. We would recommend that this be included in the Zoning Ordinance or Parks and Recreation Master Plan that is suggested in the draft.

Page 71 – Parks & Open Space Design Guidelines

“Regardless, in each retention area, a minimum of one operational drywell shall be installed and maintained in perpetuity.”

This is a very specific requirement for a General Plan. The inclusion of the word “regardless,” gives the impression that no matter the size, all retention areas should have a dry well. We would recommend removing this criteria and allowing other review and regulations to dictate the need and location of dry wells.

Thank you for taking our comments into consideration. We look forward to discussing these and reviewing future drafts.

Sincerely,

Court S. Rich