

March 31, 2014

**VIA ELECTRONIC MAIL ONLY**

Rick Miller  
Growth Management Director  
rmiller@coolidgeaz.com

**Re: General Plan 2025 Update Comments**

Mr. Miller,

Below are our comments on the draft General Plan 2025 with regards to the Pinal Land Holdings (PLH) property. Attached is also an exhibit showing the land use categories that we believe will match the anticipated master plan for the property. The suggested designations in the attached exhibit are somewhat dependent on comments included herein so may change depending on future versions of the draft General Plan.

As a whole, we believe this is an excellent draft and commend you for tackling this major project in house and so well. We strongly agree with the goal of simplifying while at the same time improving the effectiveness and efficiency of the plan. The majority of our comments revolve around items that we would prefer to see in the Zoning Ordinance or a stand-alone document, such as a Design Manual or Parks and Open Space Master Plan. However, there are others that are equally, if not more, important to the feasibility of the PLH master plan as well as the encouragement of development and economic activity in Coolidge as a community.

Comments:

**Page 21, 23, 40 Density and Intensity**

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

*Including maximum lot coverage and building height in the General Plan eliminates flexibility necessary for unique and necessary situations in the future to be dealt with via the typical processes. By including these in the General Plan, it will not be possible for the City to grant a variance without also approving a General Plan Amendment. This will create additional work for the City Staff and raise the cost of entitlements, which will discourage developers and investment in the economic growth of Coolidge. We would recommend inserting this language in the Zoning Ordinance where it is most typically found.*

Page 24 Land Use Form and Design

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

*Similar to the previous comment, this requirement, while it may be reasonable, if included in the General Plan will not allow for the flexibility a unique or innovative project in the future may need. We believe that the most appropriate place for a requirement at this level of detail would ideally be in the Zoning Ordinance. If it is kept in the General Plan, we would recommend it be a suggested feature and not a requirement.*

Page 25 Transition to Land Uses

*In reviewing the draft transitions to land use amendment levels, we believe, with the possible exception of a transition to Industrial, that it would be appropriate for any transition to the next higher or lower land use category to be a minor amendment.*

Page 27 – Appropriate Land Uses

*The land uses shown in this section are excellent representatives of several development possibilities. We suggest including Educational Institutions and Campuses to the list as they can work very well at all sizes with neighborhoods. Primary, secondary, and post-secondary campuses can work very well in close proximity to neighborhoods. The ASU Tempe campus coexists well with the single family detached neighborhoods immediately south of the campus, but there are numerous other examples.*

Page 28 – Density and Intensity (Residential)

“Developments on sites greater than 160 gross acres shall provide a minimum of 10 percent of the total gross acreage at densities of one or less dwelling units per acre.”

*In addition to this section possibly conflicting with approved, but as of yet undeveloped, PADs in the City, as a requirement in every development it will undoubtedly incur patches of lower density housing that may be out of place with the surrounding areas. Lower densities and larger lots in master planned communities are often associated with more expensive housing products due to the increased share of the development costs that each lot must shoulder. The patches of more expensive lots surrounded by communities of a higher density are not likely to be desirable to potential buyers leaving undeveloped gaps within the City. A suggested solution would be to require this unless a PAD is proposed that thoughtfully proposes an alternative that helps the City meet its overall goals for diversity of housing types.*

“Developments on sites over 160 acres may be permitted to achieve up to net target densities of 4.5 dwellings per acre.”

*We would recommend adding a section that allows developments over a larger acreage threshold, possibly 640 acres, to develop at higher densities as long as adequate separation and buffering from surrounding properties is provided.*

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 adjacent to single family residential neighborhoods at the intersection of arterial roadways. 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 are unsure why the FAR is limited for all possible development. A large project could easily have a commercial core above 0.35.*

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 believe this requirement would be more appropriately placed in the Zoning Ordinance as it may require flexibility for certain development situations. Additionally, it is unclear how this would be measured or enforced. Does a development just need to show some form of cover over sidewalks regardless of whether that cover would provide shade to the sidewalk (given the angle of the sun)? Or does the development need to show a sun study to prove that a percentage of the sidewalks will be shaded during all months of the year?*

Page 29 – Transition to Land Uses

“Business & Commerce - Major Amendment”

*The only commercial zoning district allowed in Urban Neighborhood but not allowed in Business & Commerce is C-P. For this reason, we believe a transition to Business & Commerce from Urban Neighborhood should be a minor amendment. As previously suggested, we believe it would be appropriate, with the possible exclusion of Industrial, that any transition to the next higher or lower intensity land use should be a minor amendment.*

Page 31 – Appropriate Zoning

“B-2 - General Business Zone”

*This may be a typo, but I don't see a B-2 zoning district in the Zoning Ordinance. Should this be C-2?*

Page 31 – Density and Intensity

“Where residential uses exist along the opposing collector street, a minimum of 65% of all new ground floor uses should be residential.”

*I believe the intent of this is for situations where the residential uses across the street are single family detached or a similarly low density; however, as written, this would require the 65% ground floor residential even in cases where the residential across the street is multi-family or mixed use residential above commercial/office.*

Page 36 – Appropriate Zoning

“B-2 - General Business Zone  
B-4 - Community Service Zone”

*Similar to the comments on page 31, I do not see these zoning districts in the Zoning Ordinance.*

Page 36 – Density and Intensity

“Where the land use is a business/office park, public open spaces (inclusive of landscape features) shall comprise a minimum of 20% of the gross site area.”

*Given the definition of open space as “lands to be acquired and/or preserved in their current state or returned to a natural state”, it would be difficult and unnecessary to meet this requirement.*

Page 40 – Appropriate Zoning

“B-1 - Neighborhood Business Zone  
B-2 - General Business Zone  
B-4 - Community Service Zone”

*Similar to the comments on pages 31 and 36, I do not see these zoning districts in the Zoning Ordinance.*

Page 44 – General Plan Amendment Process (Major Amendments)

“Any request for rezoning that is not in conformance with the Coolidge General Plan 2025 Land Use Map (Figure 2.1) or Transportation Plan Map (Figure 3.2).”

*By their nature, requests to amend the Land Use Map to move a property from one category to another would not be in conformance with it. This would make every request to transition between land use categories a major amendment and be in conflict with several sections of the document.*

Page 54, 55 – Roadways (Cross Sections)

*Inclusion of detailed cross sections in the General Plan will preclude any flexibility in the design of developments for the next 10 years. It is very possible that a unique situation would require a minor deviation from the standard cross section which would be impossible if the cross sections are kept in the General Plan.*

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 in the General Plan eliminates all opportunity for the inclusion of amenities not included in the Parks Amenities Table to be credited towards a minimum number of amenities. It is also at a level of detail 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 this draft.*

Page 68 – Open Space Element (Open Space)

*“For the purposes of this plan, open space is defined as lands to be acquired and/or preserved in their current state or returned to a natural state.”*

*This definition for Open Space conflicts with references to “open space” elsewhere in the document that appear to be referring to a more traditional definition of open space that includes all forms of open space.*

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. This also gives the impression that all retention areas, no matter the size, should have a dry well. There are many situations where a small retention area would not warrant a dry well. We would recommend removing this criteria and allowing engineering review and regulations to dictate the location and determination of dry wells.*

"Within the developed area, 25% shall be set aside for trail corridors (assuming a 25' ROW). The remainder of the usable open space shall be developed for recreational improvements subject to the requirements as it is written below."

*While this works well in the scenario provided, there could be many situations and neighborhood configurations where this ratio of trails to overall open space does not work. At the least it will force a "sameness" across all development that could otherwise be deviated from to provide a creative and innovative project, even if those aren't the norm.*

"Generally, golf courses do not fall into the open space category."

*Given their large size, openness, and landscaping coverage, we believe that golf courses should count, at least in part, to the overall or developed open space requirement.*

Page 76 – Growth Areas Element

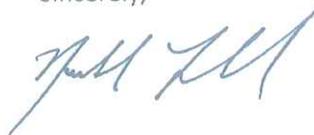
*We assume that this element (as well others, such as Water Resources) including the Growth Areas Map will be revised significantly with the inclusion of the PLH property. As is, this section essentially discourages the approval of development of most of the PLH property. It is the intention of PLH to move forward aggressively to begin development of several development parcels immediately, including the industrial and residential/commercial portions; we are under the impression the City would like to see that growth happen sooner rather than later.*

Page 109 – Cost of Development

*The land uses in the Hierarchy of Land Uses and Fiscal Impacts table do not appear to match the land use categories in the land use element of the document.*

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

Sincerely,



Nicholas Labadie