

NOTICE OF PUBLIC HEARING BY THE PINAL COUNTY PLANNING AND ZONING COMMISSION AT 9:00 A.M. ON THE **17th** DAY OF **SEPTEMBER, 2020**, IN THE PINAL COUNTY ADMINISTRATIVE COMPLEX BUILDING A, ADMINISTRATIVE HEARING ROOM, FLORENCE, ARIZONA, TO CONSIDER THE FOLLOWING REQUESTS FOR MAJOR AMENDMENTS TO THE 2019 PINAL COUNTY COMPREHENSIVE PLAN:

PZ-PA-005-20-PUBLIC HEARING/ACTION: Pinal County, requesting approval of a Major Comprehensive Plan Amendment to the 2019 **Pinal County Comprehensive Plan to amend the text of Chapter 3, Sense of Community**, subchapter **Land Use - Goals, Objectives and Policies (pp.91,105)**, **Chapter 6, Open Spaces & Places**, subchapter **Goals, Objectives and Policies (p.242)**, and **Chapter 7, Environmental Stewardship**, subchapter **Environmental Planning (p.267)**. The proposed amendment will modify the referenced chapters by modifying goals objectives and policies relating to riparian areas, wildlife corridors, and foothills, referencing and promoting the Arizona Game and Fish Department's on-line Environmental Review Tool (ERT), and by promoting the Pinal County and Arizona Birding Trails and other watchable wildlife opportunities within Pinal County.

ALL PERSONS INTERESTED IN THIS MATTER MAY APPEAR AT THE PUBLIC HEARING AT THE DATE, TIME AND PLACE DESIGNATED ABOVE.

DOCUMENTS PERTAINING TO THIS CASE CAN BE FOUND ON THE NOTICE OF HEARING PAGE FOR THE P&Z COMMISSION AT:

<http://pinalcountyz.gov/CommunityDevelopment/Planning/Pages/NoticeofHearing.aspx#>

AT LEAST 24 HOURS PRIOR TO THE PUBLIC HEARING, DOCUMENTS PERTAINING TO THESE REQUESTS ARE AVAILABLE FOR PUBLIC INSPECTION AT THE PINAL COUNTY COMMUNITY DEVELOPMENT DEPARTMENT, PINAL COUNTY COMPLEX, BUILDING F, 31 N. PINAL STREET, FLORENCE, ARIZONA, MONDAY THROUGH FRIDAY BETWEEN THE HOURS OF 8:00AM AND 4:30PM.

DATED this **19th** day of **August, 2020**, Pinal County Community Development Dept.

By:  _____

Lester Chow, Interim Community Development Director

TO QUALIFY FOR FURTHER NOTIFICATION IN THIS LAND USE MATTER YOU MUST FILE WITH THE PLANNING DEPARTMENT A WRITTEN STATEMENT OF SUPPORT OR OPPOSITION TO THE SUBJECT APPLICATION. YOUR STATEMENT MUST CONTAIN THE FOLLOWING INFORMATION:

- 1) Planning Case Number (see above)
- 2) Your name, address, telephone number and property tax parcel number (Print or type)
- 3) A brief statement of reasons for supporting or opposing the request
- 4) Whether or not your wish to appear and be heard at the hearing

WRITTEN STATEMENTS MUST BE FILED WITH:
PINAL COUNTY COMMUNITY DEVELOPMENT DEPARTMENT
PO BOX 2973 (31 N. PINAL, BLDG. F)
FLORENCE, AZ 85132

NO LATER THAN 5:00 PM ON SEPTEMBER 7, 2020.

Contacts for this matter: Evan Evangelopoulos, Planner
E-mail Address: evan.evangelopoulos@pinal.gov
Phone: #(520) 866-6642 Fax: (520) 866-6530

Anything below this line is not for publication.

PUBLISHED ONCE:

Florence Reminder & Blade Tribune (and San Tan Sentinel)

Tri-Valley Dispatch

Casa Grande Dispatch

Eloy Enterprise

Superior Sun

San Manuel Miner

Copper Basin



APPLICATION FOR A COMPREHENSIVE PLAN AMENDMENT IN AN UNINCORPORATED AREA OF PINAL COUNTY, ARIZONA
(All Applications Must Be Typed or Written in Ink)

Comprehensive Plan Amendment unincorporated & Property Information:

(Feel free to include answers and to these questions in a Supplementary Narrative, when doing so write see narrative on the space provided)

1. The legal description of the property: _____

2. Parcel Number(s): _____ Total Acreage: _____

3. Current Land Use Designation: _____

4. Requested Land Use Designation: _____

5. Date of Concept Review: _____ Concept Review Number: _____

6. Why is this Comprehensive Plan Amendment being requested? (You must provide a summary of the anticipated development on this page, if not provided, the application cannot be processed.): _____

7. Discuss any recent changes in the area that would support your application. _____

8. Explain why the proposed amendment is needed and necessary at this time. _____

INV#: _____ AMT: _____ DATE: _____ CASE: _____ Xref: _____

COMMUNITY DEVELOPMENT
Planning Division

PINAL COUNTY COMPREHENSIVE PLAN AMENDMENT APPLICATION

IN ADDITION TO THIS APPLICATION, YOU WILL NEED TO SUBMIT:

- A. One copy of a **certified** A.L.T.A. Survey, including legal descriptions of the proposed designations
- B. Location map which identifies the property and its relationship to Pinal County environs.
- C. Map showing the topography of the property.
- D. Site map which specifically identifies the property including parcels under separate ownership.
- E. Property owner(s) authorization for the Comprehensive Plan Amendment.
- F. Other information as may be determined necessary by the Planning staff or other information the applicant feels is pertinent to this request.
- G. Non-refundable filing fee as shown on the cover page.
- H. Submit a CD which contains a copy of the application and narrative in PDF format.

THIS APPLICATION MUST BE SUBMITTED IN PERSON.

I certify the information included in this application is accurate, to the best of my knowledge. I have read the application and I have included the information, as requested. I understand if the information submitted is incomplete, this application cannot be processed.

Name of Landowner (Applicant)	Address	Phone Number
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Signature of Landowner (Applicant)	E-Mail Address
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Name of Agent	Address	Phone Number
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Signature of Agent	E-Mail Address
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The Agent has the authority to act on behalf of the landowner. The Agent will be the contact person for Planning staff and must be present at all hearings. Please use the attached Agency Authorization form, if applicable

Major Open Space (or 1 du/ac) indicates lands the County is interested in preserving for recreation purposes or for cultural or ecological reasons. Further study is necessary to determine the most appropriate configuration of open space and to develop a strategy for preserving it. Staff will work closely with owners of development projects to implement Regional Trail Corridors, wildlife and wash corridors as shown in the *Open Space and Trails Plan* and refined through future studies. The owners of development projects will have the opportunity to propose corridor widths that meet the intent of the Comprehensive Plan, while minimizing impacts on the proposed projects. In conformance with State Law, these lands have the right to develop at one residential dwelling per acre.

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Planning Guidelines

The following “Planning Guidelines” are intended to provide direction and guidance to potential landowners or developers, staff and elected or appointed officials in developing or reviewing the Natural Infrastructure as part of a project.

- ✓ Recreational amenities, parks, trails and open space should be designed as an integral part of the project.
- ✓ Open space, parks and recreational areas must be large enough to be usable for the intended purpose.
- ✓ Open space is encouraged to be part of and connected to a larger, integrated regional system.
- ✓ The County-wide trails system should be integrated into developments where appropriate.
- ✓ Integrate the natural terrain, habitats, drainageways, foothills, riparian areas, wildlife corridors, foothills-and other natural features into project design where possible.
- ✓ Protect and/or minimize impact to historic sites or landmarks, including distinguishable natural features.

3.1.4.5 Encourage development that sensitively integrates natural environment and maintains healthy ecosystems, including the consideration of adjacent parcels, connectivity and wildlife linkages.

3.1.4.6 Encourage new development projects to preserve ~~significant~~ desert habitats, riparian areas, wildlife corridors, natural resources, landscapes and cultural resources where feasible.

3.1.5 Objective: Coordinate and cooperate with the ASLD planning of state trust lands within Pinal County.

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Policies:

3.1.5.1 Encourage an inclusive planning process to ensure the best possible projects on state trust lands in Pinal County.

3.1.5.2 Encourage meaningful state trust land reform so that ASLD will be able to dedicate rights of way, preserve open space in appropriate areas, and participate more in the development process, just as developers could, to increase the value of trust lands and achieve Pinal County's vision.

3.1.5.3 Preserve in perpetuity unique and sensitive lands as open space to protect wildlife and the natural environment through acquisition or other techniques such as the transfer of development rights to other ASLD holdings.

3.1.6 Objective: Protect Pinal County residents from military and aviation related hazards and nuances.

Policy:

3.1.6.1 Discourage residential and other noise-sensitive developments within airport approach and departure zones where increased noise levels will be present as a result of

Public Responsibilities, those that are primarily incumbent on the County to implement through its policy development and planning, appear *italicized*.

Private and Public Shared Responsibilities, all entities, private and public, share the responsibility of implementing these Policies and these policies appear in **plain text**.

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The Arizona Game and Fish Department's on-line Environmental Review Tool (ERT) is a project evaluation tool specifically designed for Pinal County. The ERT can help identify opportunities to protect riparian areas, open spaces, and other natural resources throughout the county.
<http://azhgis2.esri.com/content/map>

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innovative manner to topography, drainage, critical habitats and other land sensitivities.

6.1.2 Objective: Preserve, protect, or conserve the existing natural drainage system.

Policies:

6.1.2.1 Identify the significant natural washes and develop a Countywide storm water management plan that preserves the significant natural washes and adopt development regulations to implement the storm water management plan.

6.1.2.2. Develop a watershed management plan that protects the County's key contributing areas to promote water quality and conservation for future generations.

6.1.2.3 Encourage landowners to work through regional and federally-recognized solutions to remove property from floodplains to allow safe development and protection of future homeowners.

6.1.2.4 Utilize the Arizona Game and Fish Department's on-line Environmental Review Tool (ERT).

6.1.3 Objective: Identify, preserve, and protect cultural resources that have cultural significance and provide a link to historic events.

Policies:

6.1.3.1 Promote and provide incentives for subdivisions to conserve cultural resources within the County.

6.1.3.2 Enhance community awareness and increase public support of local cultural opportunities.

7.1.6.2 *Explore new and innovative technologies in solid waste management.*

7.1.6.3 *Promote practices to safely address and dispose of hazardous waste while minimizing its impact to the environment.*

7.1.7 Objective: Support efforts that increase public awareness of Pinal County’s valuable natural environment.

Policies:

7.1.7.1 *Support programs at higher education institutions that promote research and awareness of Pinal County’s natural environment.*

7.1.7.2 *Encourage environmental programs that engage young people and students in preservation and conservation of the natural environment.*

7.1.7.3 *Support efforts to establish a network of distinctive interpretive signage, maps and informational displays at recreation and conservation areas.*

7.1.7.4 *Support eco-tourism efforts and venues such as the Boyce Thompson Arboretum and the Biosphere II.*

7.1.7.5 Encourage and promote The Pinal County Birding Trail, The Arizona Birding Trail, and other watchable wildlife opportunities in Pinal County.

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streams and washes including the Santa Cruz River, Greene Wash, Gila River near Florence and San Pedro River. There are undetermined flood hazard areas in the vicinity of Tonto National Forest, Oracle and the Table Top Mountains. Minimal Flood Hazard Area refers to an area where flood insurance is available but not mandatory by federally regulated lenders. Special Flood Hazard Area refers to an area, which is at a higher risk of flooding. Tonto National Forest, parts of the Coronado National Forest and a small area just north of the Tohono O'odham Indian Community in the Sonoran Desert National Monument lie in an Undetermined Flood Hazard area. These are areas with possible but undetermined flood hazards where no flood hazard analysis has been conducted.

Flooding can result in property damage and be dangerous for people. Given those hazards, areas with the potential to flood require special consideration during the design development process. Floods and floodplains are unpredictable and understanding the nature of potential flood hazards, such as flood water levels and events, is fundamental in planning development in or near a floodplain. FEMA is the federal agency that maintains and updates flood hazard mapping in the form of Flood Insurance Rate Maps. If development is proposed in or around a flood hazard area, the floodplain can and should be engineered to minimize hazards to people and property.

Riparian Areas and Wetlands The habitat zones found immediately adjacent to streams and lakes are called riparian areas. Riparian areas encompass not only the bed or channel of the water body, but the surrounding banks, bars, ponded waters, and floodplain surfaces. There is a great concentration of vegetation, birds and wildlife in these areas, and because the surrounding Sonoran Desert is so arid, these areas are especially distinct and rare in Pinal County. Some of the larger riparian areas are found along the major creeks and rivers in Pinal County, including Queen Creek, Gila River, San Pedro River, Araivapa Creek, and the Santa

Riparian areas are the natural areas around rivers, washes, and other bodies of water. These areas include channel itself as well as the vegetation that acts as a transition zone between the riparian and upland area.

Riparian areas are habitat zones found immediately adjacent to streams and lakes.

The Arizona Game and Fish Department's on-line Environmental Review Tool (ERT) is a project evaluation tool specifically designed for Pinal County. The ERT can help identify opportunities to protect riparian areas, open spaces, and other natural resources throughout the county.

<http://azhgis2.esri.com/content/map>

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databases on wildlife and habitat inventories (from sources such as the Arizona Game and Fish Department, Nature Serve, and The Nature Conservancy), make this data readily available, and encourage land-managing entities to consider those hazards during the design-development process.

7.1.1.6 Promote planning and decision-making that consider impacts to the entire landscape, not just specific development sites.

7.1.1.7 Consider maintaining open space on lands that are environmentally sensitive due to steep slopes, floodplains, watersheds, and habitat areas.

7.1.2 Objective: Protect Pinal County's vibrant natural ecosystem.

Policies:

7.1.2.1 Promote practices that prevent the introduction and spread of invasive species.

7.1.2.2 Encourage efforts to preserve native vegetation in open space areas.

7.1.2.3 Encourage efforts to integrate areas vegetated with native species into developed areas.

~~7.1.2.4 Promote planning and decision-making that minimize disturbance to riparian areas and wetlands.~~ Promote planning and decision-making that minimize disturbance to riparian areas and wetlands and encourage project proponents to utilize the Arizona Game and Fish Department's Environmental Review Tool (ERT) as a resource to identify opportunities to protect these natural resources.

Objectives are broad statements of intent to implement the goals and provide framework for the policies.

Policies address how the goals will be achieved. Policies should be read as if it is preceded by the words “It is the County’s general policy to...” Some policies may appear to conflict with one another.

Primary Airport are those airports that have 10 or more based aircraft and have 2,000 or more annual aircraft operations. These airports offer future economic development opportunities as they grow and expand.

Private and Public Shared Responsibilities, all entities, private and public, share the responsibilities of implementing these Policies.

Public Responsibilities are primarily incumbent on the County to implement through its policy development and planning.

Recreation/Conservation identifies areas under an extra layer of federal protection, meaning that any infrastructure planned to traverse these lands will have to go through a federal permitting process and environmental review.

Regional Commercial is intended to be large-scale (over 40 acre) retail centers that draw from a large regional market area. These centers might include malls, power centers, big box retail centers, and auto dealerships.

~~Riparian areas are habitat zones found immediately adjacent to streams and lakes.~~
are the natural areas around rivers, washes, and other bodies of water. These areas include channel itself as well as the vegetation that acts as a transition zone between the riparian and upland area.

Scenic vista is a view of an area that is visually or aesthetically pleasing.

Secondary Airport is an airport that does not qualify as a Primary Airport. These airports offer future economic development opportunities as they grow and expand.

State Shared Revenues is a portion of revenues Arizona shares with local governments.

Threatened species are defined as those likely to become endangered if not protected.

Time Tax is the price paid sitting in long commutes that cuts into what we value most – our time with family, friends, home, and community.

Transit-Oriented Development is pedestrian-oriented development designed to facilitate access and use of transit facilities including buses, bus stops and light rail stations.

Vertical Mixed Use is typified by residential use over commercial uses in the same building or any other potential diversity of land uses within a building.

Viewshed is the entire area an individual can see from a given point.



Douglas A. Ducey
Governor

Lisa A. Atkins
Commissioner

Arizona State Land Department

1616 West Adams, Phoenix, Arizona 85007
(602) 542-4631

August 17, 2020

Steve Abraham
Pinal County Community Development Department
31 North Pinal Street, Building F
(PO Box 2973)
Florence, AZ 85132

RE: ASLD Comments to Proposed Pinal County General Plan Text Amendments: PZ-PA-005-20

Mr. Abraham,

Through our valued partnership, Pinal County is aware of the Arizona State Land Department's (ASLD) obligation to maximize the value of the State Trust Land (STL) for 13 designated public service beneficiaries (Beneficiaries), many of which are vital to the economic, social and physical well-being of Pinal County residents. ASLD supports the Comprehensive Plan's efforts to balance economy and the environment and understands that environmental protection and economic growth need not be mutually exclusive. Through clearly stated policies, the Comprehensive Plan can provide a level of certainty that encourages all parties to achieve these mutual goals.

As the steward of approximately two-thirds of the County's undeveloped land, we believe that the proposed text amendments found in PZ-PA-005-20 lack critical qualifiers that could inadvertently compromise the County's multi-faceted goals and responsibilities. Accordingly, ASLD offers the following comments (with underlines and/or strikeouts reflecting changes as proposed in the text amendment):

Planning Guidelines (Pg. 91), 5th Point: Integrate the natural terrain, habitats, drainageways, foothills, riparian areas, wildlife corridors, foothills and other natural features into project design where possible.

- These guidelines are quite broad. ASLD recommends revisions to identify the scale of development to which these guidelines should be applied (single lot, subdivision, master planned community, large-scale commercial centers).
- Given the Plan's frequent reference to the Arizona Game and Fish Department's Environmental Review Tool (ERT), the definition of **Riparian Areas** (Pg. 253) should be consistent with how they are mapped on the ERT's Pinal County component.

Section 3.1.4.6: Encourage new development projects to preserve ~~significant~~ desert habitats, riparian areas, wildlife corridors, natural resources, landscapes and cultural resources where feasible.

- Removal of the term “significant” implies that *any* such areas should be preserved. Furthermore, the Comprehensive Plan does not seem to define “desert habitats,” “wildlife corridors,” “natural resources,” “landscapes” and “cultural resources,” leaving opportunity for others to interpret.
- Recommending preservation of these undefined areas without any qualifications could lead to confusion within the development community and create unrealistic expectations from the public to preserve *all* such areas. Furthermore, broad-brush designation of areas for preservation could ultimately lead to fragmented ecological corridors that do little to benefit wildlife. Prioritization of high-value ecological corridors that ensure connectivity through areas most likely to see development would provide a higher level of certainty for developers and the public, allowing the County to best achieve its diverse goals.

Section 6.1.2.4: Utilize the Arizona Game and Fish Department’s on-line Environmental Review Tool (ERT)

- This tool provides valuable high-level information; however, ASLD is concerned that without clear qualifying statements in the Comprehensive Plan the general public may interpret this information as policy, rather than high-level general guidance. We suggest more substantive information be included within the ERT’s Pinal County platform that clearly defines each category, the original source(s) of its data and substantiates the rationale behind the application of each layer.
- Related to the Open Space layer, while the derivations of this are also undefined, we suspect this may correlate to the Pinal County Comprehensive Plan. Please remember that, per ARS 11-804(E):

“In applying an open space element or a growth element of a comprehensive plan a county shall not designate private land or state trust land as open space, recreation, conservation or agriculture unless the county receives the written consent of the landowner or provides an alternative, economically viable designation in the comprehensive plan or zoning ordinance, allowing at least one residential dwelling per acre. If the landowner is the prevailing party in any action brought to enforce this subsection, a court shall award fees and other expenses to the landowner. Each county shall incorporate this subsection into its comprehensive plan and provide a process for a landowner to resolve discrepancies relating to this subsection.”

Accordingly, the Comprehensive Plan’s designation of open space on STL should be updated and ASLD requests that this information not be duplicated in the ERT. ASLD’s ability to achieve our mission becomes complicated when STL is confused with public open space.

- Like the Open Space layer, depiction of planned public trails across State Trust Land is not appropriate unless they have been coordinated with and approved by ASLD. As alluded to in ARS 11-804 (E), STL is more akin to private land and presupposing land uses creates difficulty for future land planning efforts. ASLD wishes to be a partner in the protection of significant environmental corridors and be involved in defining possible recreation and conservation elements on the Trust landscape. Until then, planned trail routes should not be depicted on STL within the Comprehensive Plan or the ERT.

- Based on the description provided at the 7/22/2020 Pinal Partnership meeting, the definition of “Riparian” in the Pinal County component of ERT (areas with concentrated vegetation, not necessarily associated with water flow) does not match that provided in the proposed Text Amendment. Preserving both habitat and economic vitality of the community requires a compromise that is best reached by identifying the most critical habitat corridors and ensuring connectivity. Identifying protection areas simply based on a concentration of vegetation could cause developers to face cost-prohibitive requirements that place development and conservation interests at odds, rather than as partners.

Section 7.1.2.4: Promote planning and decision-making that minimize disturbance to riparian areas and wetlands and encourage project proponents to utilize the Arizona Game and Fish Department’s Environmental Review Tool (ERT) as a resource to identify opportunities to protect these natural resources

- Based on the mapping of “open space,” “trails,” and “riparian areas” on the ERT, coupled with this loosely defined policy to “protect these natural areas,” future development could face a cost-prohibitive financial burden. Broad statements that do not consider potential impact on future land use, development costs or ongoing maintenance and insurance costs could result in developers deciding to locate outside of the county and place more constraints on affordable housing. Text amendments should reflect these collective factors to ensure one component does not place undue burden on the other.

We believe these are important considerations in moving forward with this and future Comprehensive Plan amendments in order to achieve the diverse needs and interests of Pinal County. Thank you again for the opportunity to comment. If you require follow-up, please contact Karen Dada at kdada@azland.gov, or (602) 542-3118.

Sincerely,



Lisa A. Atkins, Commissioner
Arizona State Land Department

Attachment: PZ-PA-005-20

C: Charles Hofer, Arizona Game and Fish Department



Harold Christ
President and CEO
PO Box 904, Florence, AZ 85132
Cell: 602.810.7448
Harold@PinalPartnership.com
www.pinalpartnership.com

August 20, 2020

Steve Abraham
Pinal County Community Development Department
31 North Pinal Street, Building F
(PO Box 2973)
Florence, AZ 85132

RE: Pinal Partnership Comments to Proposed Pinal County General Plan Text Amendments: PZ-PA-005-20

Mr. Abraham,

Pinal Partnership, as an organization and on behalf of our Board of Directors, would like to submit comments for your consideration regarding the Pinal County General Plan proposed text amendments found in PZ-PA-005-02.

Our Partnership consists of public agencies throughout Pinal County as well private interests in business and industry, land ownership, development, etc. We share a goal to advocate for a sustainable Pinal County economy through the preservation and creation of employment centers, to support organized economic development efforts throughout the region, and to encourage conditions that foster economic growth. We are very supportive of open space and trails as a part of our core mission.

Collective efforts of those involved with Pinal Partnership, and our direct work, support good open space planning, especially in the most sensitive areas. Our comments below are very much in line with comments submitted by ASLD, also applying caution to avoid being too broad either in location or interpretation to prevent onerous requirements for Pinal County development at a broader level.

Planning Guidelines (page 91), 5th point: Integrate the natural terrain, habitats, drainageways, foothills, riparian areas, wildlife corridors, foothills and other natural features into project design where possible.

- Narrow guidelines to identify the scale of development in which underlined guidelines should be applied.

Section 3.1.4.6.: Encourage new development projects to preserve ~~significant~~ desert habitats, riparian areas, wildlife corridors, natural resources, landscapes and cultural resources where feasible.

- Removing the term "significant" implies that any such areas should be preserved and without a clear definition in the Comprehensive Plan of the terms "desert habitats," "wildlife corridors," "natural resources," "landscapes," and "cultural resources," could lead to confusion within the development community and set unrealistic expectations to preserve all such areas.

Section 6.1.2.4: Utilize the Arizona Game and Fish Department's on-line Environmental Review Tool (ERT)

- More substantive information included within the ERT's Pinal County platform that clearly defines categories, original sources of data and substantiates the rationale behind the application of each layer will help the information be understood as general guidance rather than policy.
- Ensure the definition of "riparian" is consistent in the Pinal County component of the ERT as well as in the proposed Text Amendment, as they do not match currently.

Section 7.1.2.4: Promote planning and decision-making that minimize disturbance to riparian areas and wetlands and encourage project proponents to utilize the Arizona Game and Fish Department's Environmental Tool (ERT) as a resource to identify opportunities to protect these natural resources

- Mapping on the ERT along with broadly defined policy could impact future land use and development costs that ultimately could turn developers away from Pinal County. Text amendments should be consistent in order to encourage development and collaboration while not placing undue burden on other components of the General Plan.

Thank you in advance for considering our comments. If we can provide further assistance in any capacity related to the proposed text amendments, please feel free to reach out to me.

Sincerely,

A handwritten signature in black ink, appearing to read "Harold Christ", written over a horizontal line.

Harold Christ

On behalf of Pinal Partnership Board of Directors