



TEXT COMMENTS

#	Text	Source	Comment	Suggested Action	Comments Addressed
1	General	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	The Pinal County Comprehensive Plan describes itself as blueprint that provides a direction linked to growth, development, redevelopment, preservation and investment to its future county population. The plan is supposed to be a general and flexible guide for the way a community believes it should develop. We believe the Plan captures that generality but the Sonoran Institute wishes to submit a few comments of praise and a couple of suggestions for areas that could be strengthened.	Comment no action required	Comment no change
2	General	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	In general, Sonoran Institute supports the following comment found in the document. "Ensuring Pinal County has adequate multimodal corridors for people and goods with a minimal impact on native wildlife."		Comment no change
3	General	James Poulos, Robson Communities & its affiliates	In general, the October 2008 draft Comprehensive Plan is too rigid and inflexible and as a result removes discretion from County staff, zoning commissioners and supervisors. Such rigidity does not allow developers to design projects to meet market conditions at the time of the development because of the predetermined designations in the Comprehensive Plan.	Remove pre-determined designations	No change made
4	General	Ryan Desmond, Vestar	Appreciate efforts in this second draft and for including our comments in the Matrix released at the conclusion of the first 60-day review period.	Comment no action suggested	Comment no change
5	General	Ryan Desmond, Vestar	We see that you have deleted the provision of encouraging parking on the sides and rear of commercial buildings and we appreciate this and your recognition of the importance of centralized parking for the success of commercial development.	Comment no change recommended	Comment no change
6	General	Greg Loper, Planning Consultant	I have worked on numerous General and Comprehensive Plans (as staff, Planning Commissioner, and as a consultant), you have done an outstanding job of providing information, allowing input, and providing opportunities for public participation through the numerous meetings, workshops and forums – keep up the great work!	Comment no change recommended	Comment no change



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7	General	Scott DiBiase	There is mention of buffers being used around agricultural areas to minimize impacts...though it's in the context of the other land uses impacting agriculture and equestrian areas. Perhaps someone should mention/provide comment that there could be impacts on the other land uses by agriculture (i.e., To use a cliché, "put the shoe on the other foot")	Perhaps someone should mention/provide comment that there could be impacts on the other land uses by agriculture (i.e., To use a cliché, "put the shoe on the other foot")	See Policy 3.1.1.4 – encourages the provision of buffers from conflicting uses
8	General	Mike Hutchinson and Roc Arnett, Superstition Vistas	Our review indicates that you incorporated a majority of our text changes in the new draft. In addition, we appreciate the notation about the ongoing Superstition Vistas planning process that has been added to the maps within the Plan. We are still concerned that the land use, roadway and rail transit maps currently in the plan do not reflect our current thinking about the major freeway corridors in the Superstition Vistas area.	Comment no recommended action	Pinal County will welcome a Comprehensive Plan Amendment when Superstition Vistas is complete
9	General	Mike Hutchinson and Roc Arnett, Superstition Vistas	We believe that its' (Comprehensive Plan) adoption is vitally important to the success of the Superstition Vistas projects.	Comment no action recommended	Comment no change
10	General	RS Matt RRT, LCI, VP of Education & Advocacy, Coalition of AZ Bicyclists	I am very impressed with the foresight and forethought dedicated to the future of Pinal County. However, I did not find much specific about bicycling.	Recommend adding more information about the various functions of bicycling. Add a policy requiring bicycle facilities on ALL collector AND arterial streets. People work and shop on collectors and arterials. Please make them bike friendly. It is very difficult to go back and retro fit and existing street.	Bike facilities are part of the cross sections
11	General Comments	John Windes, Region V Habitat Specialist, AZ Game & Fish Dept.	<p>We commend the County's efforts to produce a progressive document that incorporates the Pinal County Open Space and Trails Master Plan. Maintaining natural open space directly supports the continued viability of healthy wildlife populations within Pinal County. The Dept. strongly supports incorporation of the OPSTMP into the comprehensive plan.</p> <p>We applaud your recognition of the responsibility and encourage you to continue to plan with the public's wildlife in mind in all your endeavors.</p> <p>The Dept. commends Pinal County for moving forward with an approach which focuses growth into the existing I-10 corridor. This focused approach minimizes habitat loss and fragmentation.</p>	However, the eastern edge of this development corridor appears to be along an alignment roughly following the Willow Springs and Barkerville Roads. The Dept. would prefer to see Pinal County move the edge of this growth corridor westward along HWY 79. This would easily be accomplished by eliminating the parkway status of Barkerville and Willow Springs Roads with very little impact to already planned development. Wildlife habitat east of 79 is still relatively unfragmented and parkways here will fragment the habitat unnecessarily.	No change made

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12	General Comment	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	This process for providing comments on the plan needs to be scrapped for future projects and planning sessions. It may be good for planners, developers and policy makers, but it is completely useless for community groups and related organizations.	Allow for the standard letter submission process used for commenting throughout the country's public agencies and institutions.	Comments were accepted in any form submitted including letters. The online tool was provided to provide an easy avenue for submitting comments.
13	General	CMX	Maps reverse back and forth throughout report, making it difficult to read.	Turn all maps to read in one direction. If the Plan will be provided online, tailor it to a web-based format.	The plan will be included as a web-based format.
14	General	CMX	Principal Arterial verses Major Arterial. Are they the same or different classifications?	Suggest providing definitions.	Definitions are included
15	General	CMX	The Plan's scope is unclear and the plan does not delineate its jurisdictional boundaries (both in the land use plan and throughout policies).	Boundaries should be more clearly indicated in the Plan maps (more than crosshatching) and should not show underlying land use designations per this Plan. The Plan should include a statement clarifying policies only apply to unincorporated areas.	There are several statements in the Plan that indicates that Pinal County does not have jurisdiction within the incorporated boundaries of the cities, towns and sovereign nations.
16	General	CMX		Refer to major and minor amendments, rather than "non-major."	County state statutes talks to major amendments; Pinal County defines major amendments and then defines all "non-major" amendments. This is different than municipal state statutes that include Major and Minor Amendments.
17	General	CMX		Uniformly capitalize "County" and other words treated as proper names. Make sure titles and names are consistent throughout the Plan, e.g. Countywide vs. County-wide.	Checked for consistency
18	General	CMX	Weighing in at over 300 pages, this is a long document. Particularly in the land use section, policies are not concisely stated, thus someone cannot just read the section that appears relevant to his/her project.	Make the plan more concise and eliminate redundancies. Many policies overstep the role of a comprehensive plan and would be better suited for inclusion in the zoning ordinance.	All policies reviewed again
19	General	CMX	Make the plan more concise and eliminate redundancies. Many policies overstep the role of a comprehensive plan and would be better suited for inclusion in the zoning ordinance.	Operationalize goals by creating specific, quantifiable objectives, then create policies that specifically address and implement those objectives. Develop policies that provide a measurable action rather than simply restating a problem that should be addressed. Bullet points are useful, but need not repeat material already given.	All policies review again
20	General	CMX		Look at page breaks to prevent widowed or orphaned text.	Checked for formatting
21	General	CMX		Create chapter and appendix section pages.	Included Chapter Title Pages

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22	General	CMX	Salmon-colored box defining public and private and public responsibilities: Is it necessary to repeat this on every page addressing policies? Similarly, each section addressing goals, policies, and objectives need not repeat an explanation/definition of public and private responsibilities.	Provide public and private/public definitions at beginning of document and remove subsequent repetitions.	No change made; it is important to repeat this text
23	General	CMX	Diagrams/graphics do not necessarily relate directly to page content, e.g. roadway classifications on page 55.	Suggest eliminating "filler" graphics; use photographs and/or illustrations to augment definitions or policies.	Graphics relate to the text to illustrate the hierarchy of roadways
24	General	CMX	The Project Overview page on www.pinalcountyplan.com sets a typical comprehensive plan scope of 10-25 years. This Plan's buildout scope goes well beyond 10-25 years.	Suggest limiting this Plan to 10-25 years; there are too many unknowns to anticipate buildout. State legislation requires a 10-year review/update, so the buildout scope is misleading. The County's vision and goals may remain the same over the decades, but the land use plan and specific policies cannot (and should not) anticipate a buildout scenario. A buildout scenario is not realistic. (If the premise of this plan is buildout, the land use map is myopic: too much low density residential, too few areas of employment and commercial activity, and too limited of a "multi-modal" transportation network.)	The Plan is based on a buildout concept with 10 year Growth Areas; no change made
25	General	CMX	There is a disconnect between the discussion of issues, many of the policies stated in the Plan, e.g. smart growth and sustainability ideas, and depiction of such in the Plan's maps.	Plan should address these issues through its policies and depict growth reflective of these in its included maps.	Disagree with comment; there is a direct connection
26	General	CMX	Land use terms, e.g. moderate low density residential and mixed use - residential focused, are not well defined. Policies regarding land use diversity and housing product/density variety seem to contradict other parts of the Plan.	Provide definitions and consistently use terms throughout the entire document. It would also be helpful to provide illustrations or photographs showing what terms "look like."	Reviewed for consistency
27	General	CMX	Document has too many pages and each page is not used to its fullest. This consumes too many trees and it becomes cumbersome when trying to review and compare information.	I suggest moving the page number to the bottom of the page and using more of the top and side of the page.	Format has remained the same
28	General	Gary McGhee from Mammoth	I noticed you used the term "Sustainable Development" which is a buzz word developed by the massive extremist environmental lobby in this country with the goal of gaining full control of individual and property rights. I truly hope your plans are not designed after the national plan with the same agenda. There is a slippery slope between sustainable development and tyranny. Please don't go there.		Comment noted



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29	General	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	Sonoran Institute recognizes significant work and stakeholder involvement has gone into this process and we commend Pinal County and its consultants and residents for its broad considerations of the conservation principles in this document. Thank you for this opportunity to comment on this Plan and wish to express our support for its passage and implementation.	Comment no action required	Comment noted
30	General	Tom Collazo, Associate State Director for Conservation	Applaud Pinal County's commitment to public involvement, and the forward-looking approach to planning reflected in the document, particularly the incorporation of guiding principles of economic sustainability, mobility and connectivity, open space, and environmental stewardship. Moreover, the County has demonstrated leadership in placing a high priority on open space and environmental stewardship. It will be important to ensure that other components of the Comprehensive Plan do not conflict with or otherwise undermine these goals.	The areas that would benefit from enhanced attention and evaluation include transportation and development goals in eastern Pinal County within and adjacent to the San Pedro River Basin.	As evident by the Pinal County Comprehensive Plan, the County is supportive of policies that balance development with preservation of the San Pedro River Basin.
31	General	Tom Collazo, Associate State Director for Conservation	We commend Pinal County for recognizing the importance of protecting large, connected tracts of land and preserving river flows as a means of preserving natural heritage, wildlife, recreational opportunities, and rural values. Placing a priority on environmental stewardship and open space preservation can provide significant economic benefits as well. The San Pedro River is one of America's most ecologically significant areas, drawing hundreds of species of migratory birds, and providing important habitat for a number of threatened and endangered species. Preserving important areas, including the San Pedro River Basin, through the types of land use and water management strategies articulated in this Plan will continue to sustain wildlife and provide benefits to people as well. (see letter dated 12/22/08 for further discussion)	Comment no change recommended	Comment no change



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32	General	Tom Collazo, Associate State Director for Conservation	We commend Pinal County for putting forth a Plan that recognizes the importance of planning infrastructure in anticipation of future growth, instead of discounting infrastructure as an after thought. Pinal County is in a unique geographic position in the Sun Corridor, and is poised to grow exponentially in the coming decades. Sound land use, transportation, and water planning are critical to this anticipated growth. We support the Plan's focus in emphasizing growth in areas along existing urbanized areas in the central I-10 corridor, including Casa Grande and Maricopa, as well as in the areas adjacent to Maricopa County's East Valley. In particular, we support the Plan's articulated strategies of continuing to develop transportation and infrastructure corridors in appropriate areas, including expanding existing freeways and the development of multi-modal transit options. Likewise, it is equally important to outline areas where new or expanded transportation corridors are inappropriate.	The new arterial road proposed for the San Pedro Basin would fragment open space and important wildlife corridors, and would cross the San Pedro River within habitat managed for critically imperiled species.	See response 29
33	General	Tom Collazo, Associate State Director for Conservation	We support directing development to areas within the Pinal Active Management Area with access to renewable Central Arizona Project (CAP) water resources. Linking renewable water resources to growth is especially critical to preserving important watersheds like the San Pedro River Basin. Ensuring that growth and infrastructure will be compatible with the County's natural infrastructure will also require de-emphasis of certain goals.	The enhanced urban growth planned for the "Tri-Cities" area has the potential to fragment open space, important wildlife corridors, and adversely affect flows in the San Pedro River and its riparian habitat.	See response 29
34	General	Tom Collazo, Associate State Director for Conservation	Accordingly, we applaud Pinal County for recognizing the significant potential of the San Pedro River as an important economic, cultural, and natural resource, as well as highlighting the importance of maintaining the rural character of eastern Pinal County.	Human activities, especially wells that pump groundwater and any new development associated with that type of pumping, have the potential to significantly impact the flows in the San Pedro River. Moreover, encouraging new housing developments or Mid-Level Activity Centers in this area has the potential to diminish the rural character of this unique portion of the county.	See response 29

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35	General	Tom Collazo, Associate State Director for Conservation	Water resources are particularly vulnerable in eastern Pinal County, and we encourage the county to strongly discourage large-scale residential or commercial development in the San Pedro River Basin. Instead, the County should direct development toward areas with appropriate renewable CAP water resources where it is more appropriate.	We also strongly encourage the county to incorporate an integrated water management strategy in the San Pedro River Basin, which might include water assessment, modeling, budgets, and long-term planning, particularly to avoid making decisions that diminish the natural amenity values that make the San Pedro River a world-class resource.	See response 29 and Water element
36	General	Tom Collazo, Associate State Director for Conservation	Tri-Cities Growth Area	We strongly encourage deemphasizing growth in the Tri-cities area, and reclassifying the San Manuel Activity Center from mid-level to low-level. To reiterate comments provided in our previous comment letter, we strongly encourage Pinal County to use a variety of strategies to encourage preservation of this important East County area, including open space acquisition, inter-basin transfer of development rights, adoption of Adequate Water Supply requirements, and a zoning structure that otherwise discourages development in this area.	No change made
37	General	Tom Collazo, Associate State Director for Conservation	Overall, we sincerely appreciate Pinal County's efforts to plan for a sustainable future, which includes economic growth, open space preservation, sound transportation planning and environmental stewardship, particularly in the context of preserving its nationally significant natural resources.	Comment no action required	Comment no change
38	General	Rachel Trinder, Casa Grande	As far as I can discern from the current draft, the same proposed roadway is now called a "Parkway" rather than a "Freeway".	However, as the Revised Plan notes, a Parkway is defined as a major roadway, and the impact would be the same regardless of the nomenclature.	Follows the adopted RSRS designations
39	General	Rachel Trinder, Casa Grande	It appears further - and for this I am most appreciative - that the Revised Plan provides for some areas in the vicinity of Cox Road, North Mountain Park and the area east of Cox Road north of McCartney to be designated as Recreation Conservation Open Space. This is a most welcome development. However, it also appears that this area is subsumed within an area designated as a future potential High Capacity Corridor, a totally unrealistic designation given the nature of the area.	These designations appear to be inconsistent. A decision should be made to protect the entire area east from 1-10 to the mountains west of Central Arizona College, and not simply east from what appears (from the Revised Plan's maps) to be the Val Vista/Cox Road interchange.	Comment



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40	General	Rachel Trinder, Casa Grande	While most of the area lies technically outside the limits of the City of Casa Grande, it is an integral, and in my opinion, the most special, residential part of Casa Grande and it needs to be preserved in its entirety. It is a unique area of natural beauty, wildlife habitat, rural-style low-density homes, horse and farm properties, jobs for Pinal residents, night sky vistas, peace and quiet and clean air, and it represents the best of what Pinal County has to offer in terms of quality of life. To destroy any of it with a major roadway – whether designated a freeway or a parkway - would be tragic, and would also conflict with the City's plans for protecting this area in its current Corm. To the extent that major roadways are constructed along the Val Vista axis, they should extend no farther east than 1-10. Making this change would fully satisfy the need to "grow smart"; destroying this beautiful area would achieve the opposite of that goal.	We need to plan for growth, but we need to do it thoughtfully, intelligently and with appropriate safeguards for the special values that provide the quality of life that makes Pinal so special. The targeted area is an integral part of Casa Grande's special character, and it benefits many residents; it needs to be preserved. We can do that and still plan for the growth and connectivity that will be needed downstream.	Agreed. The Pinal County Comprehensive Plan attempts to balance the preservation of the County's quality of life while it ensures adequate roadways and infrastructure is planned to support current and future residents. At this time the plan reflects the roadways needed to support projected growth. However, additional studies will be required to fine-tune and narrow the specific roadway alignments. As part of the process the public will be actively involved in determining the roadway alignments.
41	General	Kazi Haque, Planning Manager City of Maricopa	The City of Maricopa commends the Pinal County staff for their contribution in producing this document and appreciates the expected benefits and rewards for the residents of the County. Once again, thank you for the opportunity to comment on this 60 day review of the Pinal County Comprehensive Plan. The City will be glad to assist you if further discussion is required.	Comment no action required	Comment no change
42	Table of Contents	Kazi Haque, Planning Manager City of Maricopa	Is it possible to use the word "Element" next to specific elements incorporated in the Comprehensive Plan, i.e., Land Use, Multimodal Circulation, Housing etc.?	Incorporate "Element"	No change made
43	2	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	Chapter 1 Introduction "...the Plan encourages resource conservation and healthy communities based on well protected environmental resources and a strong diversified economy."	There is good commentary throughout the document on how this might be done. However, more specifics would be welcome but an understanding of the political challenges to these specifics is understood.	No change made
44	2	Court Rich, Rose Law Group	Suggested deletion	Delete "is not a regulatory document and" from third paragraph	Statement is important; no change made



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45	3	El Dorado Holdings and Consultants	Plan should use 'Benchmark Year' rather than 'Full Build Out' scenario for Comprehensive Plan. 'Full Build Out' is based on assumptions and speculations that may very well not come true, which could lead to overbuilding of infrastructure and facilities, thus resulting in additional, unnecessary maintenance and operating costs to the County and the tax payers. The AZ Dept. of Commerce projects the population in Pinal County to be 1.4M in 2055. What then is the buildout year to reach a population of 6.1M? Is it realistic to set goals for the Comp Plan at the buildout year when it is so far out in the future?	Please provide justification for the Comp Plan based on the full buildout of 6.1M. Please provide reasoning behind using the full build out scenario versus a benchmark year scenario, such as 2055. Please identify the advantages and disadvantages of each scenario.	No change made. All projections are based assumptions. That is the nature of the exercise. The Comprehensive Plan is based on a long term vision and sets policies to reach that vision. The Growth Area element presents the areas that the County should encourage growth and infrastructure investments over a shorter more strategic timeframe. State statutes require cities and counties to update or reaffirm their plan at least every ten years providing the jurisdiction the opportunity to revisit its assumption and projections. The Comprehensive Plan provides direction for the County to do more specific area plan that may contain shorter term benchmarks.
46	3	CMX	The Plan states "smart growth and sustainability provide the overall framework" for the Plan, yet the Plan predominantly depicts moderate low density residential land uses, i.e. sprawl, in areas within its jurisdiction. Conversely, smart growth includes mixed-use, compact development supported by a multimodal transportation system.	Policies and maps need to match the general discussion of concepts included in the Plan.	No change made. Policies and maps work hand in hand. There is considerable discussion in the Plan about smart growth policies and over 30 mixed use activity centers are identified on the map. Additionally, considerable employment is designated that promotes the live/work environment.



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47	3	CMX	The Plan's buildout concept locates land uses "based on a series of assumptions." Smart growth principles suggests development decisions should be "predictable, fair, and cost effective," and encourage community and stakeholder collaboration. The buildout concept cannot anticipate land use changes from the present to buildout, and since this process will span generations, it contradicts the tenet that growth decisions include stakeholder participation. Additionally, the Growing Smarter legislation has a requirement of adopting or readopting a comprehensive plan every ten years. The Plan's scope is unrealistic and unworkable. The Plan's Vision and many of its policies may remain more or less the same over the course of multiple cycles of reoption, but the land use, growth areas, circulation, etc. will change over time.	Change the Plan's scope from buildout to 10-20 years. The Growing Smarter legislation has a requirement of adopting or readopting a comprehensive plan every ten years. The vision, goals, and many of the policies should have a longer range scope, but some policies should have shorter term goals and outcomes. Similarly, the land use plan and growth areas should focus on 10-20 years in the future.	No change made. The Comprehensive Plan identifies the long term vision and provides policy framework and implementation plan to move the County toward that vision. Part of that policy framework is how individual projects are reviewed in light of that long term vision as well as the strategic planning timeframe within the Growth Areas. Annually the County will consider updates to the Comprehensive Plan and at least once every ten years adopt or readopt the Comprehensive Plan.
48	4	Kazi Haque, Planning Manager City of Maricopa	Correction – under Vision Statement Framework	Should read "Chapter 3 for Pinal's Vision"	Change incorporated
49	10	CMX	There may be a conflict between Plan element policies, such as between environmental preservation and economic growth, however, through coordination with municipalities throughout the region, growth may be managed to effectively balance otherwise opposing policies. The Plan's scope is limited by land already incorporated into municipalities and land that will become incorporated in the future.	The Plan should identify this truth and address how coordination should occur to reduce conflict between entities. Plan maps should identify incorporated areas clearly and use area plans to show land uses within growth areas.	The Plan states that Pinal County does not have jurisdiction over incorporated cities, towns or Native American community lands.
50	10	Court Rich, Rose Law Group		Update timeline	Change incorporated
51	12	CMX	Peer counties were selected in Florida, Georgia, and Colorado.	Surprising to learn no other counties in Arizona, New Mexico, Utah, Nevada, or California met the selection criteria.	Comment noted



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52	15	Court Rich, Rose Law Group	We suggest changing the language on page 15 that indicates that projects should “further” policies in light of the acknowledged inconsistencies between policies. A more appropriate suggestion would be that proposals be “generally consistent where possible” with the plan. Further, it appears that this section is not actually needed or should be combined with the implementation section to avoid any confusion. Additionally, we suggest language be added to clarify that the proposed analysis of the burdens associated with development should also include an analysis of the benefits as well.	Second bullet replace “further” with “generally consistent with”	Change incorporated
53	15	Court Rich, Rose Law Group	See commentary above.	Third bullet added text	Modified text
54	15-18, 21	James Poulos, Robson Communities and its affiliates	The current proposed language in the October 2008 draft Comprehensive Plan requires that slight changes in a Planned Area Development (PAD) would necessitate an amendment to the Comprehensive Plan.	Flexibility should be incorporated into the Comprehensive Plan that would allow revisions to a PAD to be made administratively without an amendment to the Comprehensive Plan	Added clarifying language in Chapter 1: Introduction
55	15, 16	Ryan Desmond, Vestar	Under title “Using the Comprehensive Plan” –Text modifications	Under title “Using the Comprehensive Plan” – 1 st paragraph, 2 nd line added “staff” and put “Planning and Zoning Commission” before Board of Supervisors. 5 th line added “recommendations and” decision-making, “staff, the Planning and Zoning Commission and” 8 th line, delete “some of” and “by the Board of Supervisors and Planning and Zoning Commission.” 3 rd dot point, after “County” add “at build out”(…impacts “add” “when considering the property owner’s future contributions to infrastructure and mitigation measures which will be implemented later in the development process)?” Due to the changes above – delete first paragraph on page 16 and all dot points.	Change incorporated Change incorporated Did not change because this goes beyond just specific project review.
56	16	Court Rich, Rose Law Group	We suggest removing language that asks for an analysis of a project’s inconsistency with any of the policies because they are acknowledged to be inconsistent to some locations. Further, policies are so numerous that such analysis could be quite burdensome for staff, elected officials, owners and others.	Deleted third bullet top paragraph	Did not delete; modified bullet
57	16	Court Rich, Rose Law Group	See commentary above.	Deleted third bullet second paragraph	No change made

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58	17	Court Rich, Rose Law Group	Recommend adding a clear statement that no project is expected to be able to meet all of the goals, objectives and policies just to clarify the expectations of the plan.	Added text fourth paragraph	No change made
59	20	Court Rich, Rose Law Group	Removed text about the number of zoned units in the county because it has no relationship to developable units and is therefore not relevant to the point that is being made.	Deleted text under Private Property Rights and the Plan	No change made
60	21	Tom Collazo, Associate State Director for Conservation		Page 21: Consider adding the language “environmental” to the list of interests along with political, social, economic, and educational.	Comment incorporated
61	21	El Dorado Holdings and Consultants	"The Pinal County Comp Plan does not change zone classifications or planned area development overlay districts that exist on private property at the time of the effective date of this Plan." If this is the case, then why does the Comp Plan - Land Use Plan ignore the existing PADs? Activity Centers are depicted on the Land Use Plan and potential future High Capacity Corridors and Parkways are depicted on the Roadway Circulation Plan where there are existing PADs.	The uncertainty of how the existing PADs will be treated once the Comp Plan is adopted is of significant concern. See additional comments below regarding the existing PADs.	Added new language in Chapter 1: Introduction regarding “Relationship Between Existing Zoning and the Comprehensive Plan”
62	21	Court Rich, Rose Law Group		Added “general” in last sentence	Comment incorporated
63	29	Court Rich, Rose Law Group		First paragraph replaced “inexpensive” with “short”	No change made
64	30	Court Rich, Rose Law Group		Text changes and deletions in paragraph two	Modified
65	30	Tom Collazo, Associate State Director for Conservation		Page 30: Consider amending existing language to read, “State land parcels with high scenic or habitat attributes may be designated or otherwise preserved for conservation PURSUANT TO APPLICABLE STATE LAWS”	Comment incorporated
66	31	Tom Collazo, Associate State Director for Conservation		Page 31: Consider including the ENTIRETY of the statute A.R.S. §11-821(C) including the language, “Planning for land use that designates the proposed general distribution and location and extent of uses of the land for housing, business, industry, agriculture, recreation, education, public buildings and grounds, open space and other categories of public and private uses of land appropriate to the county.” The way it is currently drafted focuses only on the development component of this statute.	Comment incorporated
67	32	Court Rich, Rose Law Group		Text changes and deletions under Flexibility to Respond to Market Changes	Deleted sentence

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68	33	Court Rich, Rose Law Group	Paragraph should be deleted because of its negative tone concerning the present conditions of the county.	Deleted all The County of Choice and all text	Modified text
69	34	Court Rich, Rose Law Group		Added and deleted text at end of last paragraph	No change made
70	34	CMX	3rd paragraph: Why single out two of the Native American communities when discussing "the long history of agriculture". Do the other two communities not have agriculture?	List all four communities by name or make a general statement; do not just single two out.	Comment incorporated
71	35	Court Rich, Rose Law Group		Changed "negatively" to "unreasonably" in third paragraph	No change made. The Plan's policies promote compatibility and transition of land uses to avoid negative impact.
72	35	Court Rich, Rose Law Group		Text changes and deletions un Employment Growth	Minor modification made
73	38	Court Rich, Rose Law Group		Text changes and deletions in second paragraph	Modified text
74	39	CMX	3rd Paragraph: "size of terminal building"	Building should be plural.	Change incorporated
75	39	CMX	5th paragraph: Department of Defense conduct flights that may be as low as 100 feet above the ground, but altitudes for these routes range from 300 feet to 1,000 feet?	Please clarify	Modified text
76	41	Court Rich, Rose Law Group		Changed "manage" to encourage smart under Land Use Plan	Change incorporated
77	42	Court Rich, Rose Law Group		Third paragraph deleted "general"	No change made
78	42	El Dorado Holdings and Consultants	First paragraph, last sentence - "The objective is not to determine specific land uses for every individual property, but to provide a general locational framework for land uses to implement Pinal County's vision." This statement is contradicted in other sections of the Comp Plan that discuss location criteria. As an example, Chapter 10 Implementation - definition of Major Comp Plan Amendment, page 299 - "Any deletion of a planned freeway, high capacity roadway, parkway, ... (example: decision by ADOT not to build the N-S Freeway or a decision is made to change the currently portrayed corridor.)" Another example is in the Appendix A Compliance Checklist, page A1 - developments are required to conform / be consistent with the Plan's Key Concepts illustrated on the Land Use, Circulation and Economic Development graphics. Page A7 Checklist "project land uses are shown exactly as indicted on the Land Use and Economic Development graphic.	The Comp Plan cannot claim that the objective is not to determine specific land uses for every individual property, but to provide a general locational framework for land uses and then require in the compliance checklist that the properties land use be shown exactly as indicted on the Land Use and Economic Development graphic. Please resolve this contradiction.	Changed A-7 to remove the word "exactly"



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79	43	Court Rich, Rose Law Group	<p>Suggest language to deal with the situation where a land use designation that is shown on the plan divides a property owner's property into two or more designations that are not consistent with the underlying zoning on the property. In this situation we suggest language that clarifies that if a designation splits a property then the property owner has the option to develop his entire property in accordance with just one of the multiple designations present on the property or to develop in accordance with the multiple designations shown on the map. This situation will not arise often but it seems like a fair way to deal with it.</p> <p>Also expressed concerns about how the county will deal with claims that will undoubtedly arise under Proposition 207 (see letter 12/22/08 for examples)</p>	<p>Text changes and deletions in second and third paragraph</p> <p>We think that it is important that provisions be made to specifically allow zoning to be processed with a Plan Amendment. While such language does not have to be included on this page, it should be included somewhere in this document. Seeing the proposed specific zoning request while considering a Plan Amendment should help the County to better understand an applicant's plans. This should be a benefit to the County.</p>	This is a procedural decision that will be discussed as part of implementation
80	43	El Dorado Holdings and Consultants	Please clarify that existing PAD's are exempt. If the landowner requests a revision to the PAD, please clarify if entire PAD is then subject to Comp Plan or if only portion of PAD that is proposed to be revised is subject to Comp Plan? What if the proposed PAD revision would be considered a minor PAD revision under the zoning code, would that proposed PAD minor revision is considered a major Comp Plan amendment?	Include in the Comp Plan additional text that better defines and explains what happens to the existing PAD's in the County. Provide several example scenarios of an existing PAD requesting a PAD revision and illustrate how the process would work. Identify what happens to the portion of the PAD that must comply with the Comp Plan and what happens to the remainder of the PAD.	Deleted language on page 43 and added new language in Chapter 1: Introduction about the "Relationship Between Existing Zoning and the Comprehensive Plan"
81	43	El Dorado Holdings and Consultants	Clarification - During the Comprehensive Plan Workshop on November 13th, staff clarified that, when an amendment is filed on an approved PAD, only the amendment portion of the PAD is subject to conformance with the updated plan. We wish to confirm that the remainder of the PAD will not need to be brought into conformance with the Comprehensive Plan and the PAD is considered to be grandfathered.	Modify language on Page 43 to clearly define the status of adopted PADs and their grandfather status. Remove reference that "any changes" will require conformance and modify to state that changes that substantively change the land uses in the PAD will require conformance.	Deleted text. See response 80
82	43	CMX	Last sentence: "...collector, local streets and arterial streets..."	Restructure to reflect street hierarchy. Should say "...local streets, collector streets and arterial streets..."	Comment incorporated
83	43	Kazi Haque, Planning Manager City of Maricopa	Paragraph on "Adopted Master Plans" appears to be unnecessary	The applicability of any existing County, approved Master Plans should have no bearings to Comprehensive Plan unless a change is proposed after the effective due date, and is addressed in Chapter 10- Implementation (Plan Amendments).	No change made

#	Text	Source	Comment	Suggested Action	Comments Addressed
84	44	Kazi Haque, Planning Manager City of Maricopa	Ensure consistency	Due to nature of the interrelatedness in planning, it will be useful to incorporate a clear definition for "Gross Density" and "Net Density" for impacts to water resources and other finite resources. In addition, it needs to be defined accurately for consistencies with Pinal County Zoning Ordinance within specified zoning designations (Policy 7.2.6.1).	Changed to net density and modified text
85	44	CMX	Box upper left: In calculating someone's "Gross Acres" why would you exclude the non-residential areas of their property and for what purpose?	This definition of gross acres is incorrect. Gross acreage should be as shown on the ALTA or title report and includes the entire property. Net residential acreage and density excludes commercial, office, etc.	Modified text to net density
86	44	CMX	First sentence: "Schools, commercial...are excluded."	Schools should be allowed to be used for inclusion of the density calculation if the school and/or some or all of the school facilities are donated by developer. If the school district purchases property, the density calculation should net out the school site. If developer donates the property, density calculation should include the area.	Modified text to net density
87	44	CMX	The Multimodal Circulation Plan is depicted on two maps: one focused on roadways and the other on rail, transit and aviation.	All references should include entire title of exhibits.	Comment incorporated
88	44	CMX	The first plan is Multimodal Circulation Plan: Roadways; why is the second plan "accompanying" when it is called "Multimodal Circulation Plan: Rail, Transit and Aviation". Is it not it's own plan?	Stating the plan for rail, transit, and aviation is "accompanying" is misleading and suggests that other forms of transportation are secondary to the private automobile.	Comment noted; change made
89	44	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	Sonoran Institute is supportive of the following comment. "Plan...identifies a commuter rail linking Phoenix and Tucson through Pinal County..."	Comment no change recommended	Comment no change made
90	44	Court Rich, Rose Law Group		Delete "general" in first sentence after Land Use Plan	No change made
91	44	Court Rich, Rose Law Group		Text changes and deletions under Multimodal Circulation Plan	Incorporated change
92	45	CMX	1st paragraph: "Identifies a commuter rail linking Phoenix and Tucson" Upon review of the Map (fig. 4-5), it does not appear the commuter rail has been identified.	Identify in Fig. 4-5	No change made; map shows high capacity regional transit
93	45	CMX	1st paragraph: could not locate the "commercial airport" in the above mentioned map. May want to identify in the text as "Aviation Based Commerce Center".	Use one term: either "Commercial Airport" or "Aviation Based Commerce Center".	No change made; The Plan locates a new Aviation-Based Commerce Center that supports the potential development of a commercial airport ...



#	Text	Source	Comment	Suggested Action	Comments Addressed
94	52	CMX	In the Economic Development Plan, it appears there is only one area identified as agricultural use. (This is also true for the Land Use Plan, although colors are harder to identify.) It appears that existing agricultural areas have either been designated as conservation/ open space or have been designated as moderate low density residential.	Agricultural uses will be necessary for the sustainable future this Plan envisions. Look at maintaining areas of agricultural use that exist today. This Plan seems to complacently accept the economic pressure to convert farmland to higher intensity uses. Instead the Plan should designate areas that should be maintained and create policies/mechanisms for doing so (e.g. TDR, growth boundaries, conservation easements).	No change made
95	54	Robert G. Longaker III, Senior Project Manager, The WLB Group	It is our assumption that the density range for Moderate Low Density Residential (1-3.5 du/ac) is an overall density range for the entire property and that portions of the property may be developed at densities that exceed this range, provided that the overall density falls within the prescribed range. Please confirm that this assumption is accurate.	Clarification requested	Modified text
96	54	El Dorado Holdings and Consultants	The range of Moderate Low Density Residential in the first draft of the Comp Plan was 1 - 4.0 du/ac. The second draft has a range of 1 - 3.5 du/ac. Why did this change? Since the Moderate Low Density Residential Land Use is the primary residential use designation on the Land Use Plan this is a substantial change. Please address how the reduction in density in this predominant land use category effects the full buildout population?	Please justify / validate this reduction in density.	This was a directive of the Pinal Planning & Zoning Commission
97	54	Court Rich, Rose Law Group	Moderate Low Density Residential - Numerous landowners who would lose several substantial development options if this more restrictive category were developed. While this designation allows options that were not previously provided, it is still extremely restrictive and limiting in what can be done and where without seeking Comprehensive Plan amendment.	Text changes and deletions under Moderate Low Density Suggest changing name to "Moderate Low Density Community" to recognize a more permissive list of uses.	No change made
98	55	Court Rich, Rose Law Group		Changes in density ranges	No change made



#	Text	Source	Comment	Suggested Action	Comments Addressed
99	55	Kazi Haque, Planning Manager City of Maricopa	Alternative Land Uses for Moderate Low Density Residential: These specific land uses Medium/High Density Residential, Commercial and Employment developments appears to be a stand-alone land use category as it relates to Comprehensive Plan amendment procedure and will require no Plan amendments. While it is understandable that the County want to encourage new developments, but at the same time allowing modifications of substantial land uses in areas, in aggregate, would create unique growth management and control issues in the unincorporated areas of the County. Specifically, these land uses and criterion established in this section appear to give control to developments and are exempted from comprehensive Plan amendment procedures. For example, pages 56-61, and page 69 outlines various scenarios where the land uses proposed would enjoy relief from Plan amendments and in some case would not require a minor or a major amendments. Again, this appears to be in contradiction or very confusing of what is stated in Chapter 10 - Implementation, Pages 299-302. For clarity and brevity, it would be helpful to have a matrix for the Plan amendments criteria rather than several pages of descriptive data.	Please clarify- this is one area the City is most concerned with and the implications perhaps misunderstood.	Modified text
100	55	CMX	Medium Density Residential should include both detached and attached single family product. It would be extremely difficult, if not impossible, to accomplish the 8 du/ac with detached product only allowed.	There needs to be a transition land use which allows for both detached and attached. Incorporate attached single family into the MDR.	Modified sentence
101	55	CMX	Mixed Use - Residential Focused land use is only allowed in 4 locations throughout a county which is "larger than the State of Connecticut."	Since the County covers such a large area, this Plan should provide more areas of mixed-use.	No change
102	55	CMX	4th paragraph: Is the text trying to say mixed-use is allowed in the MLDR? Or is "mixed use concepts" not intended to mean mixed-use residential?	Clarify.	No change – The Plan states "mixed use concepts" are encouraged to allow flexibility and promote sustainability following a set of guidelines.
103	55	CMX	Roadway classification graphic does not match the RSRSM.	Match the RSRSM.	Noted – intended to include the RSRSM
104	55	CMX	"To promote flexibility...Within this land use...without a Comprehensive Plan Amendment."	Sentence fragment.	Sentence modified



#	Text	Source	Comment	Suggested Action	Comments Addressed
105	55	CMX	Medium Density Residential should not necessarily be located at an arterial and/or parkway intersection or above. A better use for this intersection might be commercial with MDR located adjacent to the commercial land use.	If the format remains the same, I suggest providing an allowable distance from the intersection or something to that effect.	No change
106	55	CMX	<p>* The requirements for locating other uses based on size of project, size of overall master plan (if one exists), and location on specified high capacity roadway intersections, is inconsistent and restrictive. Processing major amendments for almost any action will deter development and will create bedroom communities. The requirement for a GPA is inconsistent between the various acreage categories. The extreme ends of the range of acreages both require major amendments, while developments between 20-40 and 40-100 acres will only require minor amendments. Regardless, almost any action will result in an amendment of some sort.</p> <p>* Based on the structure of these requirements, the last paragraph implies that "Up to 20 acres" and "100 acres and more" are the only categories that could require a major GPA. Proposals within "20 to 40 acres" and "40 to 100 acres" ranges specify that proposals may be processed as a non-major GPA.</p>	<p>This section is hard to interpret; it would be easier to interpret if other uses were allowed within these areas, but only as a part of a larger master plan or area plan (but not with specific ranges of size requirements). If, however, this structure is kept, I suggest adding the following to the 3rd bullet point:</p> <p>* The 1st three acreage categories could read " All other locations (or proposals) : Require a Non-major Amendment. * The 4th category, for 100 acres and above, could read "All other locations (or proposals): Require a Major amendment. Then remove the last paragraph.</p>	Modified text; This text will allow for added flexibility for both Master Planned Communities and other projects while protecting existing land uses and meeting job creation goals created by our citizens. The other issue addressed by this new language is giving the Planning Commission guidelines for locating higher density uses. The Commission is usually unwilling to forward recommendations with higher densities because of lack of policy guidance on where they should be placed. The text has been amended to provide clarity.
107	55	Court Rich, Rose Law Group		Text changes and deletions under Moderate Low Density Residential	Modified text; see response to Comment #106
108	56	Court Rich, Rose Law Group		Text deletions	Modified text; The Comprehensive Plan needs to be more than a collection of maps. The policies in a Comprehensive Plan are the real reason for having a Plan and the maps are a tool to show the policies geographically.
109	56-57	El Dorado Holdings and Consultants	The last bullet point "All others: Non-major Amendment" under the 20 to 40 acres and 40 to 100 acres scenarios for Medium Density and High Density Residential Uses appears to conflict with the last sentence of each of those sections, "All other proposals for medium density residential within the moderate low density residential land use category will require a Major Amendment." This same comment applies to the Commercial and Employment Uses bullet points.	Please clarify intent of bullet point "All others: Non-major Amendment".	Non-major amendments are defined in Chapter 10; modified text



#	Text	Source	Comment	Suggested Action	Comments Addressed
110	56	CMX	Land use transition example does not work: employment is commercial and medium density is residential. In reality, the only transition shown is commercial to residential.	Industrial -> Commercial -> HDR -> SFR	No change. The graphic shows the transition between different land use designations; text amended
111	56	CMX	Virtually any development besides moderate low density residential in much of the Plan area will require either a minor or major amendment according to the current Plan if the development does not exceed 160 acres.	If the intention is to prevent sporadic development outside of incorporated areas, state the County's desire is for development to occur within larger master plans. Eliminate the master plan size requirement for accompanying commercial within the moderate low density residential.	No change per comment; slight modification to section though; The acreages shown for master planned communities reflect the demand that the communities could create.
112	56	CMX	In all cases except the first set of bullet points within each of the land use designations if property or uses proposed do not explicitly match the bullet points, the last bullet point points out "All others: Non-major Amendment", although, additionally in each case the last paragraph indicates "All other proposals for 'whatever' within the MLDR land use category will require a Major Amendment", which means a Major Amendment will be required in most cases.	Plan needs to be more comprehensive.	No change per comment; modified text to clarify though
113	56	CMX	The diagram at the top of the page suggests land use transitions are necessary to "ensure compatibility."	The land use plan does not indicate transition of use shown in the graphic: mixed-use activity centers drop off into a sea of moderate low density residential. Regardless, in many instances this transition is unnecessary. Different land uses may benefit one another, e.g. locating neighborhood-scaled commercial uses within a neighborhood or combining offices, retail, and residential. Smart growth principles call for mixed-use development, as does this Plan's inclusion of activity centers. Tying in with the idea of mixed use activity centers, I recommend the Plan adopt the transect approach to land uses, organizing land uses with declining intensities and densities as they get further from an activity center.	Modified diagram; That is exactly the intent of transition policies in the Plan. Text amended to provide clarification.
114	56	CMX	High Density Residential should not necessarily be located at a principle arterial and/or parkway intersection or above. A better use for this intersection might be commercial with HDR located adjacent to the commercial land use.	If the format remains the same, I suggest providing an allowable distance from the intersection.	The text does not disallow the concept discussed in this suggestion. The Plan provides guidelines for decision-makers and staff to follow.



#	Text	Source	Comment	Suggested Action	Comments Addressed
115	56	CMX	<p>* The requirements for locating other uses based on size of project, size of overall master plan (if one exists), and location on specified high capacity roadway interseptions, is inconsistent and restrictive. Processing major amendments for almost any action will deter development and will create bedroom communities. The requirement for a GPA is inconsistent between the various acreage categories. The extreme ends of the range of acreages both require major amendments, while developments between 20-40 and 40-100 acres will only require minor amendments. Regardless, almost any action will result in an amendment of some sort.</p> <p>* Based on the structure of these requirements, the last paragraph implies that "Up to 20 acres" and "100 acres and more" are the only categories that could require a major GPA. Proposals within "20 to 40 acres" and "40 to 100 acres" ranges specify that proposals may be processed as a non-major GPA.</p>	<p>This section is needlessly convoluted and hard to interpret; it would be easier to interpret if other uses were allowed within these areas, but only as a part of a larger master plan or area plan (but not with specific ranges of size requirements). If, however, this structure is kept, I suggest adding the following to the 3rd bullet point:</p> <p>* The 1st three acreage categories could read " All other locations (or proposals) : Require a Non-major Amendment. * The 4th category, for 100 acres and above, could read "All other locations (or proposals): Require a Major amendment. Then remove the last paragraph.</p>	Modified text; see item #106
116	57	CMX	<p>General comment (last paragraph in Commercial uses) implies that "Up to 20 acres" and "100 acres and more" require a major GPA if not in conformance while the proposals within "20 to 40 acres" and "40 to 100 acres" allow other proposals to be processed as a non-major GPA.</p>	<p>I suggest providing the following 3rd bullet point, if the format remains the same:</p> <p>* The 1st three categories could read " All other locations (or proposals) : Require a Non-major Amendment. * The 4th category could read "All other locations (or proposals): Require a Major amendment and remove the last paragraph.</p>	Modified text; see item #106
117	57, 58	Ryan Desmond	<p>The "moderate low density residential" criteria to allow commercial as of right should be modified to permit larger commercial developments at the intersection of two principal arterials and in master planned communities of any size if compatible with surrounding land uses.</p>	<p>Recommend revising both the first criteria for 20 to 40 acres and 40 to 100 acre categories (page 57) to read as follows: "allowed at the intersection of two proposed or existing principal arterials or above."</p> <p>Recommend revising second criteria for the 20 to 40 acre and 40 to 100 acre categories on page 58 as follows: "</p>	No change; the criteria are designed to help guide decision-makers when reviewing land use proposals. The criteria help them to determine where developments will have the most opportunity for success.

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#	Text	Source	Comment	Suggested Action	Comments Addressed
118	57-58	El Dorado Holdings and Consultants	Commercial Uses: 20-40 acres and larger sites - first bullet point requirement of "at least 1/4 mile from platted or existing residential development." Is the intent literally "platted or existing residential development"? Does residential development mean single family detached residential or does it also include apartments, townhomes, condos and attached dwellings such as duplex, fourplex, etc? The way this reads one could interpret that no commercial is allowed within 1/4 mile of any existing or platted residential development even medium or high density residential. If that is the intent, what use then would be allowed in the 1/4 mile area surrounding the commercial use? How was the 1/4 mile (1320 ft) distance determined? Where did it come from?	Need to clarify intent and justify how the 1/4 mile distance was arrived at. The 1/4 mile distance around a 100acre or larger commercial development seems appropriate, but seems excessive around a 20 - 40 acre and 40 - 100 acre commercial development. Suggest on the smaller commercial projects that the distance is graduated to something less, such as 1000 ft for the 40 - 100 acre commercial site and 660 ft for the 20 - 40 acre site.	The text has been amended to provide further clarity. These criteria provide flexibility for the MLDR category; they do not establish minimum distance between uses.
119	57	El Dorado Holdings and Consultants	2nd bullet point under "Commercial Uses" - notes a "preferred location at 2 proposed or existing principal arterial streets. What is the difference between a preference and a requirement in terms of Comprehensive Plan compliance?	Define what "preferred" is intended to mean.	Deleted dot point
120	57	Court Rich, Rose Law Group		Text deletions	Modified text; see item #108
121	58	Court Rich, Rose Law Group		Text deletions	Modified text; See item #108
122	58	El Dorado Holdings and Consultants	In "20 to 40 acres" category, is 20 -40 acres a maximum amount of commercial at any one intersection or just the amendment threshold for any one site, regardless of the existence of commercial zoning or development on the other intersection corners?	Clarify intent of language.	Modified text
123	58	CMX	Employment Uses - all employment in excess of 20 acres is not allowed with 1/4 of platted or existing residential uses; a major amendment is required.	This creates sprawl.	No change; intent is to provide adequate buffer and to encourage employment in designated areas. The scenario shown will require a non-major amendment.
124	58	CMX	All commercial and employment uses in excess of 20 acres is not allowed with 1/4 of platted or existing residential uses.	In many cases, these uses are appropriate adjacent to residential uses. It seems this is a part of the Plan merely because it is too much effort to properly provide direction for uses throughout the county.	Modified text; these criteria provide flexibility for the MLDR category; they do not establish minimum distance between uses.
125	58	CMX	Multifamily residential may be desirable adjacent to commercial.	I suggest specifying single-family residential or adding some form of buffering between commercial and residential use.	Modified text



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126	58	CMX	General comment (last paragraph in Employment uses (office) implies that "Up to 20 acres" and "100 acres and more" require a major GPA if not in conformance while the proposals within "20 to 40 acres" and "40 to 100 acres" allow other proposals to be processed as a non-major GPA.	The requirement for a GPA is inconsistent between the various acreage categories. The extreme ends of the range of acreages both require major amendments, while developments between 20-40 and 40-100 acres will only require minor amendments. Regardless, almost any action will result in an amendment of some sort. This section is needlessly convoluted and hard to interpret; it would be easier to interpret if other uses were allowed within these areas, but only as a part of a larger master plan or area plan (but not with specific ranges of size requirements). If, however, this structure is kept, I suggest adding the following to the 3rd bullet point: * The 1st three acreage categories could read " All other locations (or proposals) : Require a Non-major Amendment. * The 4th category, for 100 acres and above, could read "All other locations (or proposals): Require a Major amendment. Then remove the last paragraph.	Modified text
127	58	El Dorado Holdings and Consultants	In "20 to 40 acres" category, a requirement of 1/4 mile spacing will not allow for any pedestrian/bicycle interaction between neighborhoods and commercial areas. Isn't this contrary to the criteria to provide connectivity and linkages? The ability to integrate commercial and residential uses is better analyzed at the time of zoning.	Eliminate minimum spacing requirement.	Modified text; these criteria provide flexibility for the MLDR category; they do not establish minimum distance between uses.
128	59	El Dorado Holdings and Consultants	Employment Uses - Offices: Same comment as in Commercial Uses	Need to clarify intent and justify how the 1/4 mile distance was arrived at. The 1/4 mile distance around a 100acre or larger commercial development seems appropriate, but seems excessive around a 20 - 40 acre and 40 - 100 acre commercial development. Suggest on the smaller commercial projects that the distance is graduated to something less, such as 1000 ft for the 40 - 100 acre commercial site and 660 ft for the 20 - 40 acre site.	Modified text; these criteria provide flexibility for the MLDR category; they do not establish
129	59	Court Rich, Rose Law Group		Text deletions	Modified text; see item #108
130	60	Court Rich, Rose Law Group		Text deletions	Modified text; see item #108
131	61	Court Rich, Rose Law Group	Given the goals, objectives and policies and other plan elements, it appears that the guidelines beginning on Page 61 are unnecessary and duplicative. If you prefer to retain these we support just retaining the "General Residential Planning Guidelines" and removing the Urban, Suburban and Rural guidelines because it is not clear when they will apply and when they will not because they do not correspond to a land use category.	Text deletions	Modified text; The criteria are designed to help guide decision-makers when reviewing land use proposals.



#	Text	Source	Comment	Suggested Action	Comments Addressed
132	61	El Dorado Holdings and Consultants	"General Residential Planning Guidelines" - It should be clarified that these guidelines should be used when reviewing platting and zoning, not to determine compliance with the Comprehensive Plan.	Clarify text for the intent of the guidelines.	No change; the criteria are designed to be used for Comprehensive Plan amendments as well as platting and zoning. The more general guidelines will be most applicable to the Comprehensive Plan, the more specific guidelines will be most applicable to other processes.
133	62	CMX	RR Planning Guidelines - "Landowners may develop large lot, single-family rural residential, or cluster development on smaller lots to conserve open space, views, and other natural features". How is this implemented? 40 acres equates to 20 lots. Does that mean only 20 cluster type units would be allowed? Or could the density be increased to justify marketing cluster type units?	Define the equivalent category for RR in the land use plan and use the same names in the maps and text. The text should address what densities are allowed. Provide an illustration (or photograph) of what cluster development looks like. Also consider a transfer of development rights program.	No change; The current Zoning Ordinance allows cluster development in one zoning category. The proposed amendments to the ordinance would allow the cluster option in most of the rural categories.
134	62	CMX	Suburban Residential Planning Guidelines - What density range does this fall under?	Match text to maps and define.	See page 54; These guidelines categories correspond to the categories used to define the land uses types under Residential Land Use Definitions, only a few pages previous.



#	Text	Source	Comment	Suggested Action	Comments Addressed
135	62	El Dorado Holdings and Consultants	"Suburban Residential Planning Guidelines" - It should be clarified that these guidelines should be used when reviewing platting and zoning, not to determine compliance with the Comprehensive Plan. "Projects must be able to provide adequate water" - ADWR requires this at platting, see also comments under Water Resources Section in Chapter 7. "Development impact on the transportation system should be addressed" - this implies that a TIA is required in order to determine compliance with the Comp Plan. Per recent workshop forums staff confirmed that TIA's were not required to determine compliance with Comp Plan. "Access to employment opportunities is a consideration" - this implies that residential projects will be denied if they are not near existing employment. Is that the intent? "Convenient proximity to neighborhood retail centers and professional services should be provided" - define "convenient", most often rooftops are required before retail and professional services will build, thus this appears to be contradictory. Is the intent to only allow residential developments that are near or within convenient proximity to a municipality?	Please clarify text for the intent of the guidelines and define at what stage (Comp Plan, Zoning, and Platting) they are required. The word "convenient" is too subjective and needs to be defined.	No change to Planning Guidelines; The criteria are designed to be used for Comprehensive Plan amendments as well as platting and zoning. The more general guidelines will be most applicable to the Comprehensive Plan, the more specific guidelines will be most applicable to other processes. The public is now paying much closer attention to transportation issues, and the County has responded by doing much more extensive transportation planning. Changes to the Comprehensive Plan which are significant intensifications of the plan will impact the system that has been laid out. Decision-makers need to know if an approval will require us to enhance the transportation system. Depending on how dramatic the requested amendment is, staff may ask for a traffic analysis. Deleted check point mentioned
136	62	Court Rich, Rose Law Group		Text deletions	No change; see #108
137	63	Court Rich, Rose Law Group		Text deletions	No change; see #108

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138	63	CMX	Urban Residential Planning Guidelines - What density range does this fall under?	Match text to maps and define.	See page 55; These guidelines categories correspond to the categories used to define the land use types under Residential Land Use Definitions, only a few page previous



#	Text	Source	Comment	Suggested Action	Comments Addressed
139	64-70	El Dorado Holdings and Consultants	<p>What if an Activity Center or an Employment Area is located on an existing, primarily residential PAD? What happens to the PAD? What if the landowner proposes to revise the PAD by incorporating a portion of an activity center? Would that constitute a major comprehensive plan amendment? What would happen to the balance of the PAD? Is the intent here to mandate the Activity Centers in the locations as shown on the Land Use and Economic Development Plans and in the percentage / acreage mixes as identified in the Comp Plan? If so, this is contradictory to the statement on page 42 that reads "The objective is not to determine specific land uses for every individual property but to provide a general locational framework..."</p>	<p>Include in the Comp Plan additional text that better defines and explains what happens to an existing primarily residential zoned PAD where an Activity Center would now be located per this Comp Plan. Providing several example scenarios of an existing PAD requesting a PAD revision to include a portion of an Activity Center and illustrate how the process would work. Identify what happens to the portion of the PAD that must comply with the Comp Plan and what happens to the remainder of the PAD. Also, please provide example scenarios of an existing primarily residential zoned PAD that is located at an intersection where an Activity Center is designated that requests a revision to the PAD not at the intersection and does not want a portion of an Activity Center on the PAD.</p>	<p>Deleted text on page 69; modified 3-11, 3-12, 3-14, 3-15 and 3-16. Properties that have zoning cannot be forced to change their approved land use mix, no matter what the Comprehensive Plan shows. The proposed Comprehensive Plan update has a much stronger focus on meeting the citizens' expectations than the current Plan. The proposed Plan also provides much more guidance than the existing plan. As more detail is revealed in projects that have zoning, through the platting or site plan review process, there may be some policies that will apply these projects. Existing Planned Area Develop. can request changes to their PAD at anytime. They can focus their requests so that only the area that they want to change will be subject to the updated Comprehensive Plan. If a property owner that has property where an Activity Center is shown can apply for zoning for that Activity Center without amending the Comprehensive Plan. If he wants to rezone an area much smaller than the Activity Center calls for staff may not support the application. If the land use mix he is proposing does not adequately reflect the land use mix match shown for that level of activity center, staff may not support the application.</p>

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#	Text	Source	Comment	Suggested Action	Comments Addressed
140	64-72	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	Impressive discussion on “Mixed Use Activity Centers.” This concept is great for compact development and linkages for multimodal transportation corridors.	Comment no change recommended	Comment no change
141	64-67	CMX	Mixed Use Activity Centers in general are typically found in established urban and suburban areas, as defined by ULL. Mixed uses need to be marketed differently than traditional residential and commercial development. However, in the Pinal Comp Plan, the three types of MU Activity Centers seem more appropriate for urbanized areas than for some of the rural areas in the County. How does the plan address and encourage MUAC in the rural communities? Note: most smaller communities may not have mixed use zoning districts or general or comp plan land use designations.		The Plan is a long term visionary document that sets a policy framework that will guide development such as mixed use activity centers when appropriate timing occurs. All development is not intended to occur over the next 10 years. Activity Centers located in rural areas will be able to help the viability of those areas by providing goods, services, schools and other gathering places for rural residents.
142	64	Court Rich, Rose Law Group		Text deletions	No change; see item #108



#	Text	Source	Comment	Suggested Action	Comments Addressed
143	65	Court Rich, Rose Law Group	The Mixed Use Activity Centers must not set out specific uses and the examples of such centers should be removed entirely from the Plan. Importantly, the Activity Centers should be a category that an applicant can request but we recommend that the county not place them on the initial land use plan map unless at a landowner's request and should only locate them on the Land Use Map if called for after creating a Specific Area Plans. On page 65 we propose eliminating references to the various uses in each of the three types of centers and instead simply focusing on the size of centers.	Text changes and deletions	<p>No change; The Activity Center concept is one of the cornerstones of the Comprehensive Plan update. They allow for the provision of goods, services, schools, and other gathering places. They also allow us to provide locations for jobs. One of the ideas that the citizens of Pinal County emphasized most strongly is that they wanted to see good quality of jobs located in the County.</p> <p>Allowing Activity Centers to be totally conceptual would remove most of the County's role in helping to make these centers a reality, and greatly reduce the chance of them being developed. Removing the land use guidelines for the Activity Centers would also work against the citizen's goal of quality job creation.</p>
144	65	CMX	All Activity Centers, as depicted on the Land Use Maps, are bisected by two arterial, or higher, roadways. In some instances, the diagrams and tables illustrate a more pedestrian oriented core, especially in the "High Intensity Activity Center", which identifies the primary means of mobility as anything other than private automobile.	I suggest identifying the activity centers as a general location. A CPA should not be required when in the general vicinity location shown on the map. Cores of activity centers should be intact, not bisected by major transportation corridors; i.e. it makes sense that an activity center should be connected to major transportation networks, but the actual core should not be centered on an intersection as shown in the Plan.	Modified text; The plan provides flexibility for the locations of activity centers.
145	66	El Dorado Holdings and Consultants	Low Intensity Activity Center Characteristics - please explain 200' - 400' radius from center core? What is required within this radius area? Graphic depiction shows radius of 1/8 to 1/4 mile - 200 to 400'. 1/8 to 1/4 miles equals 660' to 1320', hence 660' to 1320' - 200' to 400' dimensions do not make sense. What is the intent?	Please clarify the intent.	Modified numbers



#	Text	Source	Comment	Suggested Action	Comments Addressed
146	66-70	Court Rich, Rose Law Group	Pg. 69 – We propose a series of Specific Area Plans be created to place the Activity Centers in the appropriate location on the Land Use Map. Further, the plan should allow Activity Centers to be located anywhere pending an amendment request from a landowner. T	Deleted descriptions of Activity Centers and locations County is encouraged to remove the overly restrictive and detailed requirements on page 69 and instead, encouraged to put forth rules suggesting where these locations would be most appropriate. To recognize the importance of Specific Area Plan process we recommend showing the Activity Center “dots” in the Legend for the Land Use Plan and including the following note – Mixed Use Activity Centers will be added in specific locations on this map as a result of a Specific Area Planning process and/or at the request of applicants with the county’s approval.	Modified text; see #143 Deleted/modified text No change
147	67	Robert G. Longaker III, Senior Project Manager, The WLB Group	Modify list of primary land uses shown in Table 3-13	Add light industrial to the list of primary land uses shown in Table 3-13	Incorporated change
148	67	Greg Loper, Planning Consultant	Provide additional diversity within the “Medium Intensity” designation	Provide additional diversity within the “Medium Intensity” designation by providing for more non-residential land uses and employment opportunities (especially Business Park and light industrial uses).	Incorporated change
149	67	El Dorado Holdings and Consultants	Mid Intensity Activity Center Characteristics - please explain 160' radius from center? Graphic depiction shows Core Zone of a 1/4 mile (1300') radius, what is the 160' radius for? Transition Zone graphic depiction shows 1/2 mile - 2400' radius, which equals 2640' - 2400' radius, while bullet point states 2,400' radius from center core. This is confusing, please clarify.	Please clarify the intent.	Modified numbers
150	68	El Dorado Holdings and Consultants	High Intensity Activity Center Characteristics -same general comments as other activity centers the dimensions on graphic and in bullet points do not correlate. Please clarify.	Please clarify the intent.	Modified numbers
151	66-68	El Dorado Holdings and Consultants	On all three activity centers how was the percentage mix of the various uses determined? Where did this come from? What source?	Need to understand how acreages / percentage of various land uses were arrived at. Did this come from ULI? If provide source.	Source: Staff, AECOM and PSA, Inc.; The percentages were based on achieving the Pinal Vision and the experience of consultant and staff team.



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152	68	CMX	Table 3-15, not enough "basic employment" jobs available.	Plan needs to address how Pinal County will attract employers and provide greater areas for employment accordingly.	Modified percentages. Basic employment jobs are important to Pinal County. Chapter 5: Economic Sustainability addresses this issue. One of the main goals of the Plan is to provide opportunities for the creation of jobs of all kinds. There are many features of the plan, including Activity Center, which are designed to achieve this goal.
153	68	CMX	Table 3-15, % of residential seems low.	Increase % of residential.	Modified percentages
154	69	El Dorado Holdings and Consultants	"No Comp Plan amendment is required if the Activity Center is located where indicated on the Pinal County Land Use Plan." What happens if the Activity Center is located on top of an existing residential PAD? What if the property owner of the existing PAD does not want the activity center? Are you requiring a major Comp Plan amendment if the Activity Center is moved to the next closest major intersection?	Need to understand intent.	Modified text. An amendment will be required if an applicant seeks to move an Activity Center beyond what is shown in the Plan. If an Activity Center falls on an existing PAD, and the property owners build under the existing zoning, they will not be required to develop the Activity Center.
155	69	CMX	Bullet #3 - "The proposed land use has not already been taken from the Primary Land Use list in the applicable Activity Center Characteristics table by another approval." For that to have happened there would have been a comprehensive plan amendment and why would that happen if the Activity Center was planned elsewhere to the point of not allowing the use in the previously planned area per the comprehensive plan?	Please explain. This is confusing.	Deleted The development of an activity center does not require an amendment to the plan.
156	71-72	Court Rich, Rose Law Group	The meaning of planning guidelines and the time at which they are to be applied is not clear throughout the plan.	Text changes and deletions un Planning Guidelines	Modified text; the Comprehensive Plan is designed to provide policy guidance throughout the development process.



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157	70	CMX	"The proposed Activity Center is not located where indicated..." Although the property is located at the intersection proposed in the Plan, but control of the intersection may only be on one or two corners, it would require a minor amendment? What are the chances the control of property by one entity would be on all 4 corners? Most property is owned in blocks of sections or portions of sections and the Activity Centers are typically located in 4 Sections, therefore a potential for at least 4 separate ownerships. Minor amendments will be required more than not.	Require an area plan to cover the entire area of the Mixed Use Activity Center. No amendment would be required. The discussion of activity centers, which includes specific criteria for location and types of permitted uses, is specific to the level of zoning. The comprehensive plan should discuss and depict activity centers more generally and leave the specific details, such as permitted uses and specific configuration, to zoning (the Plan's land use map is not specific to the level of a zoning ordinance - rightfully so - but becomes complicated when combined with the specific requirements in the text).	Modified text; Someone does not need to control all four corners of an intersection to take advantage of an Activity Center.
158	70	El Dorado Holdings and Consultants	"These Mixed Use Activity Center parameters supersede all other Major and Non-major Amendment requirements outlined in the Comp Plan." Define the parameters. Are they the bullet points on pages 69 and 70 or the tables and graphic depictions 3-11 through 3-16 or both? Supersede means to take the place of or to replace. Is there a reason why this statement has been added? Are there conflicting requirements elsewhere in the Comp Plan?	Need to understand intent of this statement.	Clarified text
159	71	El Dorado Holdings and Consultants	Planning Guidelines for Activity Centers - 3rd bullet point "Mixed Use Activity Centers can be either vertically or horizontally mixed. Table 3-11, page 66 identifies the Low Intensity Activity Center as All Horizontal Mixed Use. This seems to be contradictory.	Can the Low Intensity Activity Center have a Vertical mixed use element?	Clarified text- refers to mid & high intensity
160	71	CMX	Bullet #4 - the range of jobs for the most part includes "white collar" jobs and therefore does not truly offer a "range of quality jobs."	"Quality" should not assume that "white collar" is better than "blue collar." Both white and blue collar type jobs are necessary.	No change
161	72	Court Rich, Rose Law Group		Add text last paragraph	No change
162	73	El Dorado Holdings and Consultants	"The employment target for Pinal County is closer to the economically healthy 500 jobs per 1,000 residents." How was the 500 jobs / 1000 residents established? See page 94 and table 3-18 which identifies 670 jobs / 1000 population. Which is it?	The 500 jobs / 1000 population may be a reasonable goal at some level of buildout, but employment generating businesses typically locate in areas with an established population of skilled and / or unskilled workforce, which means the rooftops have to be there first. Further dialogue is needed in order to understand the intent.	The target is 500 but the Land Use Plan indicates at least that amount can be accommodated in the Land Use Plan.
163	73	Court Rich, Rose Law Group		Text changes and deletions in third paragraph	No change

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164	73	CMX	"The employment target for Pinal County is closer to the economically healthy 500 jobs per 1,00 residents".	How much area has been allocated for Employment? Currently, Pinal County does not have sufficient carrying capacity to reach that target. In order to attract "basic employment" jobs, defined in the Plan to be manufacturing, much more property - and in larger tracts - needs to be allocated for employment than what the Plan depicts. Research municipalities which have successful in attracting huge corporations and determine much area was allocated for those industries to come into their cities. Provide more commercial and industrial uses to target more industry such as high tech, medical and higher education schools.	The Comprehensive Plan allocated adequate land to meet or exceed employment target. See Comment #161
165	74	Court Rich, Rose Law Group	Remove reference to Community and Regional Commercial throughout this section because there is no corresponding land use category on the land use map.	Text changes and deletions under Commerce-Related Definitions Allow up to 40 acres of commercial without a plan amendment in any category	No change
166	74	CMX	"...A full range of commercial development is encouraged." It does not appear so when reviewing the Plan.	Plan needs to be more specific and outline locations for commercial.	No change
167	74	CMX	General Commercial - There are 3 types of commercial, although there is no mechanism for knowing where they are located.	Plan needs to be more specific and outline locations for commercial.	The Comprehensive Plan provides guidance in locating commercial to allow greater flexibility to respond to the changing market and needs of Pinal County residents.
168	76	CMX	The Planning Guidelines section discusses different levels of commercial intensities, but these are not reflected in the Land Use Plan.	The Plan should show commercial land uses, in particular regional commercial designations. Since much commercial activity is too small relative to the scale of the land use map, suggest providing area plans.	See Comment #167
169	76-77	Court Rich, Rose Law Group		Text changes and deletions under Planning Guidelines	Modified sentence
170	76, 77	Ryan Desmond, Vestar	Under General Commercial Planning Guidelines – Recommend text changes	Under General Commercial Planning Guidelines – Recommend changes last "checkpoint" to read: Concentrate commercial development in cohesively planned centers or districts rather than individual commercial uses or parcels in a linear strip along roadways where possible.	Incorporated change
171	77	Ryan Desmond, Vestar	Under General Commercial Planning Guidelines – Recommend text changes	Under General Commercial Planning Guidelines – Recommend changes first "checkpoint" to read: General impacts of commercial development on the surrounding local and regional roadway network should be considered with determination of actual impact and appropriate mitigation measures occurring later in the development process.	First check point deleted
172	77	CMX	Bullet #4 - "Neighborhood Commercial is best located on collector or arterial streets." Agreed. However, this conflicts with page 57; here the Plan indicates the preferred location for commercial is at the intersection of two proposed or existing principle arterial or above.	The Plan should be consistent. Suggest locating commercial per page 77.	Deleted the reference on page 57; see Comment #118 also



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173	77	CMX	Bullet #2 - Community Commercial, What are major roadways?	Identify and define major roadways.	Changed "Major Roadways" to "...parkways, principal arterial or above"
174	77	El Dorado Holdings and Consultants	2nd bullet point, "Neighborhood commercial is located in close proximity to residential to reduce travel time and distance. Define "close". What is the difference between the word "close" used here and the word "convenient" used on page 63 to define residential proximity to neighborhood centers? Should use same terminology for consistency and whether the word "close" or "convenient" is used, it should be defined.	Need definition.	Deleted dot point on page 63; Clarified "close proximity"
175	78	CMX	Bullet #2 - Regional Commercial, if the market area is 8 to 12 miles and Community Commercial is 3 to 5 miles, there is a gap between 5 and 8 miles. Mileage was not applied to the Neighborhood Commercial, it would be assumed the service area is 0 to 3 miles.	Plan should identify market areas, e.g. Neighborhood Com: 0-3miles, Community Com: 3-8 miles, Regional Com: 8-12 miles. Currently, commercial is not shown in the land use plan. Assuming commercial is within activity centers, at a 12-mile radius not all residential areas are within service areas.	Incorporate change; Policy documents such as the Comprehensive Plan need to have some flexibility built into them
176	78-79	Court Rich, Rose Law Group		Text changes and deletions under Agriculture Planning Guidelines	No change; Comprehensive Plan need to have some flexibility built into them
177	79-80	Court Rich, Rose Law Group		Text changes and deletions under Employment Planning Guidelines	Modified text; the guidelines in the Plan better reflect the direction of the citizen participants in the process
178	79	El Dorado Holdings and Consultants	"Employment Planning Guidelines" - 1st bullet point - "Maintain land designation for employment to place Pinal County in a position to take advantage of future economic development opportunities." It is one thing for the County to set aside land for future economic opportunity, but what will the County do to attract the economic development? Setting aside the land is desirable, but it won't do any good if the County does not implement programs & incentives to attract the economic development. "It is critical that the County not reallocate employment-designated land to accommodate short-term trends." Need to define "short-term trends. What if Employment is shown on the Economic Development and Land Use Plans where an existing residential PAD is located? Need to understand County's intent with the existing PAD's.	Need to understand County's intent regarding Employment designated areas and existing PAD's. This section seems to contradict the statement on page 21 of "The Pinal County Comp Plan does not change zone classifications or planned area development overlay districts (PAD) that exist at the time of the effective date of this Plan."	Modified text; If employment uses are shown where there is an existing PAD, and the property owners build under the existing zoning, they will not be required to develop the employment uses
179	80	Court Rich, Rose Law Group		Deleted text under Aviation-Based Commerce Center Planning Guidelines	No change made

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180	82	CMX	Bullet #5 - Noise Sensitive Areas, is the interior noise levels (45 DNL) constant in all DNL's?	Provide clear direction, reference State Statutes.	Added ARS reference
181	83	Court Rich, Rose Law Group		Text changes and deletions under Noise Sensitive Planning Guidelines	No change
182	83	CMX	Last sentence: "Considerable open space is designated on lands that are environmentally sensitive due to steep slopes, floodplains, watersheds and habitat areas". How much and how close of a study was done to determine these locations?	Include a map outlining areas of steep slopes, floodplains, watersheds and habitat areas to support open space designations.	See Compendium www.PinalCountyPlan.com
183	83	Tom Collazo, Associate State Director for Conservation		Page 83: Consider amending the last sentence to read "considerable open space is designated on lands that are environmentally sensitive DUE TO BIOLOGICAL DIVERSITY OF PLANTS AND WILDLIFE, CULTURAL RESOURCES, WATERSHEDS, FLOODPLAINS, TERRAIN OR habitat areas."	Change incorporated
184	84	Tom Collazo, Associate State Director for Conservation		Page 84: Consider using complete reference to A.R.S. §11-824 if text is incorporated (as required under this statute). Current text reflects a truncated version.	Added full ARS reference
185	84	Court Rich, Rose Law Group		Added text under Planning Guidelines	No change
186	85	CMX	Bullet #1 - What is a "sensitive mountain park"?	Suggest defining.	Deleted reference
187	86	CMX	Additional Land Use Designations - Why are the TDR's, Conservation Easements, Planning Areas, etc. within the additional land use designations and listed as "planning guidelines"?	These are not truly land use designations. RPAs and Character Planning Areas should be called out as overlays, while TDRs and conservation easements are mechanisms/incentives for preservation of agricultural areas and open space. Move TDR's and conservation areas to "Growth Areas" section and provide an additional section for "Area Plans" or "Planning Areas."	No change
188	86	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	Transfer of Development Rights Section – This is a key concept for developing in a more infrastructure efficient model	Lacks commentary on legal mechanisms needed for implementation.	No change; As with many goals and guidelines in the Plan, we are not able to cover all implementation details in the Plan. If the Plan is approved there will be a number of items which will require further elaboration.
189	86	Tom Collazo, Associate State Director for Conservation		Page 86: We appreciate incorporation of conservation easements as a strategy for planning; however, consider changing the language to read "governmental entity, private landowner, or non-profit organization, such as the Nature Conservancy, or local land trust." [TNC is not a "land trust" per se]	Change incorporated

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190	86	El Dorado Holdings and Consultants	Conservation Easements - use conservation easements to preserve environmentally-sensitive lands. There should be some kind of incentive for setting aside land in a conservation easement. Is there a property tax reduction if land is placed into a conservation easement or could there be a transfer of development rights to another property?	Providing a reward to set property aside would provide the property owner with the incentive to do this.	Comment noted
191	86	Court Rich, Rose Law Group		Added text under Transfer of Development Rights	No change
192	87	CMX	Character/Planning Areas - Maintaining and promoting these character areas is very important as Pinal continues to grow. The word "County" is missing.	Update to include the word "County".	Incorporated
193	89	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	SR 79 context Sensitive Corridor Planning Guidelines speaks of cluster development integrated with the natural environment to preserve esthetics, however the next bullet point limits heights and decreases building massing to preserve vistas. Usually, clustering development increases density, which requires increased building heights.	This conflict should be resolved clearly.	No change; Through further corridor planning, important vistas will be identified and how the natural environment will be integrated.
194	89	Court Rich, Rose Law Group		Text changes and deletions under SR 79 Context Sensitive Corridor Planning Guidelines	Modified text
195	90	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	Ecotourism for the Pinal County region is a wonderful concept and will help build support for preservation of the open spaces worth preserving in the area.	Comment no change recommended	Comment no change
196	91	Court Rich, Rose Law Group		Text changes and deletions in first bullet	Incorporated change
197	91	Tom Collazo, Associate State Director for Conservation		Page 91: Consider expanding on specific goals of the "Copper Corridor strategies for contextual development" or omit the reference. We suggest including recognition of sensitivity of development near San Pedro River.	Modified checkpoint
198	91	CMX	US 60/SR 177/SR 77 Hospitality/Tourism Corridor - Inconsistent text to State Route 79 Context Sensitive Corridor. On page 91, title is missing SR 77. Note: State Route was spelled out on sheet 89.	Add SR 77 to the title and be consistent through out the Plan.	Consistency improvements made
199	91	CMX	Bullet #3 - What is the "Copper Corridor"? Not everyone is familiar with this term.	Suggest defining.	Deleted reference

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200	91	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	US60/SR177 Hospitality/Tourism Corridor Planning Guidelines mentions under the second bullet point "Incorporate consideration for wildlife movements."	The language should be strengthened to say, "Incorporate consideration for wildlife movements by preserving migration corridors between habitats and building safe crossing areas across transportation corridors."	Incorporated change
201	92	El Dorado Holdings and Consultants	Residential Assumptions - 75% efficiency, additional 15% deducted for neighborhood commercial, parks trails & trail connections, net result 60% available for residential dwelling development. What does this calculate out to be in number of dwelling units and then population? What portion of each of these residential land uses (residential & mixed use) equates to the 6.1M population at full buildout?	Please provide calculations for number of dwelling units at full buildout.	For this draft, numerous sets of dwelling unit projections were used. First, dwelling units in the county areas outside of the Municipal Planning Areas or MPAs (also excluding Native American Communities) was calculated at approximately 775,000. CAAG has developed dwelling units estimated at 2,345,000. This figure will likely change upon the calculations made for the Public Hearing Draft as land uses have been changed.
202	92	El Dorado Holdings and Consultants	Mixed Use-Residential Assumptions - Wouldn't there also be an efficiency factor applied to this mixed use? What does this calculate out to be in number of dwelling units and then population? What portion of each of these residential land uses (residential & mixed use) equates to the 6.1M population at full buildout?	Please provide calculations for number of dwelling units at full buildout.	See Comment #201 response
203	93	CMX	Table 3-17 - "General Service Commercial", the term Service has been added to the General Commercial designation. This terminology is not used elsewhere in the Plan.	Suggest revising to provide consistency throughout the Plan.	Consistency improvements made



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204	93	El Dorado Holdings and Consultants	Table 3-17 Footnotes were provided for items 10 & 12 thru 15 regarding assumptions and standards used to arrive at the sq. ft. /employee, Fr and Jobs/Acre. Could you also provide footnotes for items 1 thru 9 & 11 on the basis of assumptions and standards, i.e. what they are and where they came from?	Please provide basis of assumptions and standards on Sq Ft/Employee, FAR & Jobs/Acre.	Employment projections were done for each Activity Center based on its size and projected mix of uses. This was added to employment projections from employment areas in the county but not in the MPAs, this was then added to employment projections done by CAAG within the MPAs, and then retail/commercial employment was estimated using a factor of four percent of the land uses being in this category. Therefore, there are many answers to this question.
205	94	El Dorado Holdings and Consultants	Employment and Population Summary Table 3:18 identifies 6.1 M population at buildout and 4.1M employment or 670 jobs / 1000 population. The first draft of the Comp Plan Table 3:11, page 55, identified 6.4M population and 3.48M employment or 540 jobs / 1000 population. Need to understand how and why the population projections went down, but the employment criteria went up. What caused the employment to population ratio to jump from 54% to 67%? Maricopa County has a jobs to population ratio of approximately 50% and is substantially closer to achieving full buildout than is Pinal County. According to the AZ Dept of Commerce in 2007 Pinal County had a jobs to population ratio of 32%. Why then would this Comp Plan project a 67% jobs to population ratio? Additionally, the 670 jobs/1000 population is contradicted in other section of the Comp Plan, example see page 36, 73, 121 & 184. Which is it 500 or 670 per 1000?	Provide justification that the 67% ratio is realistic and achievable. Further discussion is needed to understand the assumptions and calculations that were used to arrive at the 67%. The rule of thumb used by experts in the field is that an average of 1.3 jobs per household are needed for 'economic sustainability'. Assuming an average of 1 child per household the ratio works out to be 1.3 jobs / 3.0 persons = 43%. Please substantiate the 67% ratio.	The 67% figure is not the employment target. The employment to population target ratio of .50 was established early in the process and has not changed. The .67 is the estimated employment carrying capacity of all lands designed for employment within the county along with an estimate of commercial/retail jobs that will serve the build out population. What this means is that based on the land use designation in the county and MPAs and the assumptions used to calculate employment estimates, there is presently adequate land designated for employment uses to satisfy the .50 target.
206	94	El Dorado Holdings and Consultants	How was the population within and outside of MPA's calculated? The prior draft of the Comp Plan had this table reflecting a population of 6.4 M and a 540 jobs / 1000 population ratio. Why did the buildout population go down to 6.1M and why did the ration change to 670 jobs / 1000 population?	Please provide backup calculations for the population projections and the employment projections, including assumptions and standards.	See response above.

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207	95	Ryan Desmond, Vestar	Policy 3.1.1.5 revision	Policy 3.1.1.5 revision – Locate incompatible commercial (excluding general retail), industrial and agricultural uses in areas away from homes where negative impacts can be mitigated.	Modified policy
208	96	El Dorado Holdings and Consultants	Policy 3.1.1.6 "Encourage regional sewage treatment to be located in appropriate areas where negative impacts can be mitigated." Wastewater treatment plants need to be near housing developments for the cost effective reuse of effluent. Why is this policy under the Promote Diverse Employment Opportunities - Objective 3.1.1?	This policy should be deleted	No change; current adopted Land Use Policy
209	96	El Dorado Holdings and Consultants	Policy 3.1.2.4 "Encourage new development to locate where amenities and infrastructure already exist, are planned or will be provided." Would an Anthem, AZ be encouraged or discouraged under this policy? Certainly, amenities and infrastructure did not exist at the time Anthem was zoned, but they were planned and provided as the project developed. Please explain this policy.	Please clarify intent.	No change; current adopted Land Use Policy
210	96	CMX	3.1.1.6 "Encourage regional sewage treatment and solid waste disposal facilities to be located in appropriate areas, where negative impacts can be mitigated."	Recommend moving to 7.1.6.	No change; A Master Planned Community could show, through the amendment process, how they would provide amenities, infrastructure and services for the community
211	96	Court Rich, Rose Law Group		Text changes and deletions under Objective 3.1.2	No change
212	96-97	Court Rich, Rose Law Group		Text changes and deletions under Objective 3.1.3	No change
213	97	CMX	3.1.3.5 "Encourage new development projects to preserve significant desert habitats, natural resources, landscapes and cultural resources where feasible."	Recommend moving to 3.1.4.	Incorporated change



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214	97	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	Policy 3.1.4.3 "Encourage protection of wildlife corridors" is the core element in preserving and protecting wildlife in the county.	<p>This policy needs more attention and more detail. If not addressed proactively, commercial and residential development, and their associated mobility requirements can swallow up potentially valuable wildlife corridors in no time. Furthermore, this policy should focus on wildlife linkages, not just "corridors". Use of corridor language only infers that they are narrow and restricted, when sometimes you need larger areas to maintain linkages, especially for larger mammals. We also suggest that Pinal County incorporate recommendations from the Arizona Game and Fish Department, including a policy to consult with Game and Fish on all major developments.</p> <p>Dr. Paul Beier and other scientists at Northern Arizona University are currently conducting detailed assessments of critical wildlife linkages throughout Arizona, including specific spatial recommendations for the preservation of wildlife linkages. This is a follow up to the Arizona Wildlife Linkages Assessment, completed in 2007 by the Arizona Wildlife Linkages Workgroup (led by AZ Game and Fish and ADOT). Data from this study shall be utilized to protect wildlife corridors More information on these wildlife linkages assessments can be found at: http://www.corridor-design.org/arizona/ and http://www.azdot.gov/Highways/OES/AZ_WildLife_Linkages/assessment.asp.</p>	Modified policy
215	97-98	Court Rich, Rose Law Group		Text changes and deletions under Objective 3.1.4	Modified policy
216	98	Tom Collazo, Associate State Director for Conservation		Page 98: Policy 3.1.4.5, we suggest removing the added language encouraging landowners to "remove property from floodplains" because it is inconsistent with policies to protect natural infrastructure. The previous draft said, "Discourage development within 100-year floodplains."	No change; Floodplains in Pinal County can be extraordinarily large. Improvements can often be made which will provide natural amenities while allowing nearby development.
217	98	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	3.1.4.6 Encourage development that sensitively integrates the natural environment as an important asset of the development. This policy is too vague in describing what it means to integrate the natural environment into development.	Including this as a direct policy statement is a step in the right direction. Please provide more detail as to what it means to integrate the natural environment into development. Is this just in the form of landscape design or does it actually have a scientific relationship to the health of ecosystems? We would like to see an emphasis placed on the existence of healthy natural environments integrated within development; those that consider the ecosystem and not just the micro environment of faux desert landscaping. This includes consideration of adjacent parcels and the creation of connectivity and wildlife linkages across developments.	Modified policy



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218	98	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	3.1.5.4 Preserve in perpetuity unique and sensitive lands as open space, and potentially transfer development rights to other ASLD holdings. The preservation of state trust lands, in conjunction with existing protected open spaces, is integral in the development of healthy desert ecosystems and the natural connections of these areas with each other.	We would like to see more emphasis placed on the acquisition and preservation of state trust lands for open space preservation related to protection of wildlife and the natural environment. These areas can be used for non-motorized recreation such as hiking, equestrian uses, hunting, fishing, etc. Pinal County needs to work with the neighboring counties, including Pima, to integrate its planning for state trust lands and to ensure that what it is doing is consistent with the Sonoran Desert Conservation Plan. We suggest that Pinal County incorporate the Sonoran Desert Conservation Plan into its planning processes.	Modified policy Also potential implementation strategy
219	98	CMX	3.1.4.5 "Encourage landowners to work through regional and federally-recognized solutions to remove property from floodplains to allow safe development and protection of future homeowners."	Recommend moving to 6.1.2.	Incorporated change
220	98	CMX	3.1.4.6 Encourage development that sensitively integrates the natural environment as an important asset of the development.	This is generally a repeat of 3.1.4.1; suggest omitting or combining.	No change
221	99	CMX	Character/Planning Areas Goals, Objectives, and Policies - It would seem most of the Goals, Objectives and Policies for the Planning Areas would be duplicates of each other. For example, why wouldn't "dark sky" be within each of the Planning Areas?	These goals should be generally applicable throughout the County.	No change; relates to currently approved Character Areas; We believe that each of these policies are unique enough to keep.
222	100	Tom Collazo, Associate State Director for Conservation		Page 100: We strongly support the inclusion of Policy 3.2.1.6. We recognize that achievement of this policy is a private and public shared responsibility. However, we encourage Pinal County to utilize all governance tools available to it to ensure that no development proposals are approved that fail to demonstrate that their water use will cause no unacceptable impact to groundwater levels and surface flows in the San Pedro River. This also applies to Policy 3.9.16 on Page 127.	No change; Each of these goals, policies and objectives come from planning exercise in these communities.
223	101	El Dorado Holdings and Consultants	Policy 3.3.1.3 "Encourage dark skies and eliminate street lights." There is a public safety issue here. Eliminating street lights could put the County at risk for lawsuits, if an accident occurs because of inadequate street lighting. Additionally, many families will not locate to a subdivision that does not have streetlights, because of the safety issue.	Suggest revised text "Encourage dark skies. If street lighting is desired, it should be accomplished through small, indirect, bollard style light standards.	Incorporated change
224	101	Court Rich, Rose Law Group		Text changes and deletions under Objective 3.3.1	Modified text
225	102	CMX	3.3.1.12 Encourage new development to use a water provider with an assured 100-year water supply as opposed to individual wells.	Recommend identifying a limitation of lot sizes to apply "use of a water provider". May not be practical to have a water provider for a new development of "large lots".	No change; Each of these goals, policies and objectives come from planning exercise in these communities.
226	103	CMX	3.4.3.3 Plan for access to the lake.	Be specific, identify what lake.	Incorporated change



#	Text	Source	Comment	Suggested Action	Comments Addressed
227	103	CMX	3.4.4.2 Minimize the impact of new development.	Be specific, identify which impacts.	No change; Each of these goals, policies and objectives come from planning exercise in these communities.
228	103	Court Rich, Rose Law Group		Deleted Policy 3.4.4.2	No change; Each of these goals, policies and objectives come from planning exercise in these communities.
229	106-119	El Dorado Holdings and Consultants	Observation - It is noticeable that this section of the plan devotes seven pages to the Gateway/Superstitions Vistas area, yet less than two pages to the West Pinal Growth area, which is roughly ten times the size of the Gateway/Superstitions Vistas area. If the West Pinal Growth Area is the "heart" of the Sun Corridor Megapolitan area, shouldn't more detail be provided?	Is a more detailed area plan warranted for the West Pinal Growth area?	No change; Superstition Vistas planning is currently underway and incorporates more direction. The implementation program suggests the initiation of further specific area plans for all Growth Areas.
230	106	CMX	The Growth Areas should address all of the seven Vision components.	Incorporate or reference the vision components, for example "as noted in Vision Statement Framework in Chapter 1, page 4".	Incorporated change
231	107	CMX	"The County guides and manages these areas to encourage urban-type development has urban-type services and facilities as well as the prevention of urban sprawl."	This sentence is unclear; need to restructure sentence or delete.	Modified sentence
232	107	Court Rich, Rose Law Group		Deleted Growth Areas text	Modified text
233	108	CMX	Why are the "holes" in the growth area exhibit? For example, the area between Gold Canyon and Florence or south of Arizona City is not included in the growth areas.	Suggest relating growth areas to activity centers. Growth areas seem like they are describing the status quo. Concentrate growth in and around existing cities. Break up the large, amorphous growth area in western Pinal County into more focused nodes, i.e. utilize a polycentric model.	Added text explaining boundaries in Growth Area section
234	109	CMX	A more detailed master planning project being completed for 12-square miles called the Lost Dutchman Heights area, which is located just north of Superstition Vistas within the City of Apache Junction.	Incomplete sentence.	Modified sentence
235	109	CMX	Gateway/Superstition Vistas Growth Area or Superstition Vistas or Superstition Vistas parcel or piece of property, or area, etc. The many uses of terminology for the Gateway/Superstition Vistas Growth Area is confusing.	Could be easily defined as "Superstition Vistas".	Incorporated changes
236	110	CMX	The Superstition Vistas parcel is extremely large...	Suggest removal the word "parcel".	Incorporated change
237	110	CMX	The parcel includes areas....	Suggest rewording to say, " Superstition Vistas includes areas..."	Incorporated change
238	110	Court Rich, Rose Law Group		Change plains to fan in last paragraph	No change; see definition in box

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239	111	CMX	The first full paragraph is essentially a repeat of other previous paragraphs.	Recommend incorporating the 2nd sentence on page 111 into the 2nd and 3rd paragraphs on page 109.	Incorporated change
240	111	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	Sonoran Institute expresses its support for the commentary on Superstition Vistas to offer development opportunity that integrates the environment and efficient land use patterns. Additionally, the comment of “embracing new ways of designing communities” is right on target.	Comment no change requested	Comment no change
241	112	CMX	2nd para. ...proposed SR 802 corridor and Magma railroad.	Suggest identifying SR 802 and Magma railroad (all railroads) in Fig. 4.5 if referencing in the Plan.	Correct reference is “Magma Arizona Railroad”
242	112-116	Court Rich, Rose Law Group		Text changes and deletions regarding Superstition Vistas	No change
243	116	Court Rich, Rose Law Group		Deleted text in last paragraph	No change
244	116	CMX	There are no planning guidelines planned for the Growth Areas other than Superstition Vistas?	Superstition Vistas is currently being planned and preliminary guidelines/area direction exists. Reference this plan and note that changes may occur over time.	No change; already addressed
245	116	Kazi Haque, Planning Manager City of Maricopa	The "West Pinal Growth Area", the largest among the four, includes a majority of the incorporated municipalities and populations within Pinal County. Many of these municipalities and unincorporated areas of Pinal County that have been lumped together as a single growth area share drastically different characteristics. However, this is one area the Plan articulate the least as it relates to growth management, diversity, economic, ecological and sustainable developments in the City of Maricopa and the unincorporated areas of the County. In addition, the Growth Area Element does not elaborate the strategic implementation of Pinal County's long-term vision and fails to outline specific steps the county can take to encourage sustainable growth and development in regards to the stated Pinal County vision.	Comment	Comment no action
246	117	CMX	2nd sent ...and Tohono O’odham Nation)...	Revise to match figure 3-4 or vise versa, "Indian".	Addressed consistency
247	117	Court Rich, Rose Law Group		Deleted text regarding West Pinal Growth Area	No change
248	117	Court Rich, Rose Law Group		Change “freight classification” to “Switch”	No change; We checked with UPRR and these terms are interchangeable.
249	118	CMX	Tri-Communities Growth Area - SaddleBrook Ranch is located outside of the Growth Area. It is south and east of Oracle Junction.	Revise last sentence so as not to be misleading.	No change



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250	120	Tom Collazo, Associate State Director for Conservation		Page 120: We strongly discourage classification of San Manuel as a Mid-Intensity Activity Center. Consider revising to Low-Intensity. We appreciate classification of Oracle and Mammoth as Low-Intensity Activity Centers.	No change
251	120	Court Rich, Rose Law Group		Goal 3.5 format change	No change
252	121	Court Rich, Rose Law Group		Deleted Policy 3.5.1.2	No change
253	121	Court Rich, Rose Law Group		Policy 3.5.1.6 delete "and protect"	No change
254	121	El Dorado Holdings and Consultants	Policy 3.5.1.2 "Encourage the municipalities to adopt the County's jobs per capita goal of 500 jobs per 1000 residents to promote the County's economic viability. As identified above the rule of thumb used by experts in the field is that an average of 1.3 jobs per household are needed for 'economic sustainability'. Assuming an average of 1 child per household the ratio works out to be 1.3 jobs / 3.0 persons = 43% or 430 jobs per 1000 population. Using this formula in order to get 500 jobs per 1000 population, assuming the same average of 1 child per household for a total of 3 persons per household, you would need 1.5 jobs / household of 3.0 persons. To achieve the 670 jobs per 1000 population as identified on page 94, you would need 2 jobs / household of 3 people. We question whether the 500 jobs per 1000 population is a realistic goal for Pinal County and the municipalities within the County.	Need to substantiate jobs to population ratio.	No change; considerable discussion has occurred and the jobs to population target should be similar to Pima and Maricopa counties due to the projected growth rates and goal of long term economic sustainability.
255	122	Court Rich, Rose Law Group		Policy 3.5.1.8 delete "quality"	No change
256	122	Court Rich, Rose Law Group		Policy 3.5.1.13 text change and deletion	Modified policy
257	123-127	Court Rich, Rose Law Group	Believe these are duplicative and redundant of other goals, objectives and policies	Delete Goals, Objectives and Policies for Growth Areas	Modified policy
258	125	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute		The section that explains Goals and Objectives should be revised. It would be more readable and fit in context better if each goal and objective, with its associated policies be included immediately after the narrative of each section. That would help tie them together.	No change



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259	126	Andy Laurenzi, Center for Desert Archaeology	The San Pedro River corridor from Winkelman to the Pima County line is a nationally significant resource, both for its natural and cultural resource values. Specific policy guidance is desirable that explicitly recognizes the significance of the this river corridor and the need to integrate growth-related issues associated with the Tri Communities Growth Area, the goals of the Hospitality-Tourism Corridor and conservation of the this nationally significant resource.	Add policy direction that allows for consideration of a river corridor management plan along the entire length of the San Pedro River in Pinal County.	Added new policy
260	127	Robert G. Longaker III, Senior Project Manager, The WLB Group	Section 3.9.1.7 – reference correction	Section 3.9.1.7 – reference to “San Manuel Mine of Operation Master Plan” should be “BHP San Manuel Property – Conceptual Master Development Plan.”	Incorporated change
261	130	Andy Laurenzi, Center for Desert Archaeology	Cultural Resources - Introduction	Broaden the narrative to include specific mention of the San Pedro River valley as a nationally significant cultural landscape. The San Pedro River valley is noteworthy for the extent and intact nature of its prehistoric resources.	Incorporated change
262	130	CMX	1st para: City misspelled as "City of Casa Grande...."		Incorporated change
263	132	Court Rich, Rose Law Group		Deleted text regarding Certified Local Government Program	No change
264	135	Court Rich, Rose Law Group		Deleted Policy 3.10.1.7	No change
265	135	CMX	3.11 "Educate" the citizens...	"Inform" may be a better term to use.	Incorporated change
266	135	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	3.10.1.10 Identify appropriate treatment measures to be taken when significant prehistoric, historic or archaeological sites, buildings, structures and objects may be adversely impacted. This statement is completely insufficient.	There needs to be strict and stern actions taken to preserve cultural and historic resources, and severe punishments that discourage such actions.	Comment noted; No change; We appreciate the passion and hope we can continue to work with you and the development community on the implementation of these policies if they are approved.
267	137	El Dorado Holdings and Consultants	Please clarify what happens to an existing PAD where there is now a proposed Parkway or Freeway running through or adjacent to it that is not identified on the PAD Land Use Plan nor is it stipulated?	Include in the Comp Plan additional text that better defines and explains what happens to the existing PAD's in the County that are not required by zoning stipulation to accommodate a Parkway or High Capacity Corridor. Provide example scenarios of an existing PAD requesting preliminary plat approval and illustrate how the process would work. Would staff require that the ROW for the Parkway or High Capacity Corridor be provided on the preliminary plat and / or that the PAD be amended to accommodate the Parkway or High Capacity Corridor? Would this requirement force the PAD to comply with the Comp Plan? Please explain.	Modified text; See new text in the Introduction
268	137	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	Chapter 4 - This plan still proceeds on the notion of a transportation system that is and must be dominated by the automobile.	All transportation plans should include alternatives to automobile transportation of people and goods. Pinal County is at a point where they can completely transform how communities get around and remove their dependence upon the fossil fuel culture.	Comment; The Chapter identified multi-modes (transit, bike, pedestrian, etc.)

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269	137	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	Chapter 4 - This plan does include viable and valuable forms of mass transportation, including links to systems in Pima and Maricopa county. However, too much emphasis is still being placed upon ensuring that the automobile will always be required as the primary mode of personal transportation.	Incorporate community planning and design that encourages alternative personal transportation methods for getting to work, to buy goods or for recreation. Mixed use development can have a tremendous effect on reducing a community's vehicle miles traveled statistic if done properly and with adequate foresight.	No change
270	138	Court Rich, Rose Law Group		Text changes and deletions under Purpose	Modified text
271	139-140	Court Rich, Rose Law Group		Text changes and deletions under Relationship to Pinal County's Vision	Modified some text
272	139	El Dorado Holdings and Consultants	Last sentence in second to the bottom paragraph "There will be a much larger number of elderly persons in the County and transit will be the most suitable option for them." Elderly implies retired which will not be a part of the work force. Ties back to jobs to population ratio.		Comment no change
273	142	Kazi Haque, Planning Manager City of Maricopa	Add to list of documents	Add RTP and Maricopa Transit Study	Incorporated change
274	142	Court Rich, Rose Law Group		Text changes and deletions	No change
275	143	Court Rich, Rose Law Group		Deleted text under Interstate 10	No change
276	144	Court Rich, Rose Law Group		Deleted text under High Capacity Roadway	No change
277	145-146	Court Rich, Rose Law Group		Text changes and deletions under Principal Arterials	No change
278	146-147	Court Rich, Rose Law Group		Text changes and deletions under Multimodal Circulation Plan: Roadways	No change
279	147	Court Rich, Rose Law Group	Delete because it is a restatement of information found in other county studies and is not actually inconsistent with information included in the RSRM	Remove Figure 4-3 as it is merely a restatement of information found in other county studies and is not actually inconsistent with information included in the RSRM	No change; Figure 4-3 has standards for Interstate/High Capacity and Enhanced Parkways
280	148-151	El Dorado Holdings and Consultants	The designation of a "Potential Future High Capacity Corridor" creates uncertainty with respect to adjacent properties. What exactions will be required by the County in these areas? When will a further study be prepared to determine if such High Capacity Roadways are needed?	Remove this designation until further studies warrant their inclusion. The entire Chapter 4 should be revised to reflect what was approved in the RSRM, including the roadway classes, Multimodal Circulation Plan map, etc.	No change; Text has many qualifiers
281	150	Court Rich, Rose Law Group		Deleted Interstates and High Capacity Corridors and Enhance Parkways	No change

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282	150	CMX	Enhanced Parkways - The RSRSM is no longer proposing the "Arizona Parkway Concept" of indirect left turns.	Revise or remove the detail and references to the indirect left turn concept.	No change; RSRM states parkway design "to be determined by Pinal County in reference to the Final Arizona Parkway Guidelines."
283	151	Court Rich, Rose Law Group		Deleted text under Parkways	No change
284	151	Court Rich, Rose Law Group		Deleted text under Principal Arterials	No change
285	151	CMX	Parkways - limited (right in/right out only) access to commercial sites on this road classification and the enhanced parkways is detrimental to the viability of successful commercial sites. In particular when the Plan only allows commercial sites on intersections of Principal arterials and above without an amendment.	Remove limitation of partial access. The detail does not match RSRSM Figure 2, Typical Plan Views, Regionally Significant Routes.	No change. Please see Table 5 of the Pinal County RSRSM Access Management Manual adopted by the Pinal County Board of Supervisors
286	151	CMX	Reference to the RSRSM.	Reference should be made in the paragraph under the heading of Multimodal Circulation Plan: Roadways on page 146.	No change
287	152	Kazi Haque, Planning Manager City of Maricopa	Correction	MaricopaXPRESS instead of Maricopa Xpress	Incorporated change
288	152	Kazi Haque, Planning Manager City of Maricopa	Under MaricopaXPRESS Bus Service 3 rd line – delete State Capitol to "downtown Tempe" area. Next sentence, change "a" to Section 5311. Last sentence – change both references to "two" to "three" and change Phoenix to "Tempe"	Text changes recommended	Incorporated changes
289	152-156	Court Rich, Rose Law Group	Remove because it is a restatement of current condition of the services described.	Deleted all text	No change
290	154	Kazi Haque, Planning Manager City of Maricopa	5 th line add "Maricopa"	Text change recommended	Incorporated change
291	156	Kazi Haque, Planning Manager City of Maricopa	Paragraph regarding "Truck Freight Service" – Why is 238 and 347 not included? Even if they are bypass routes.	Clarify	No change
292	157	Court Rich, Rose Law Group		Text changes and deletions	No change
293	159	Court Rich, Rose Law Group		Change "will" to "may" second bullet	Incorporated change

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294	159	Kazi Haque, Planning Manager City of Maricopa	Top of page reference to website	Comment – it already exists on Pinal County website	No change
295	160	Court Rich, Rose Law Group		Text deletions first bullet	No change
296	164	Court Rich, Rose Law Group		Text changes and deletions	No change
297	165	Court Rich, Rose Law Group		Change “Preserving” to “Possible” in first bullet	Added “Potential”
298	166	Court Rich, Rose Law Group		Text addition to third paragraph	No change
299	167	Court Rich, Rose Law Group		Delete “deficiencies”	Incorporate change
300	167	Court Rich, Rose Law Group		Change “must” to “is encourage to” in third paragraph	No change
301	168	Court Rich, Rose Law Group		Add “where appropriate” after bicycling in first paragraph	Incorporated change
302	169	Court Rich, Rose Law Group		Delete “Deficiencies” in heading	Incorporated change
303	171	Court Rich, Rose Law Group	Add – Pinal County has similar air quality issues to the other fast growing areas of Arizona – to the fist sentence under “Current Situation and Issues”	Add text under Current Situation and Issues	Incorporated change
304	172	El Dorado Holdings and Consultants	Objective 4.1.1 Develop a balanced transportation system. Please define balanced. Balanced implies not over-built or under-built. Wouldn't a benchmark year scenario, rather than a full build-out scenario, better assist with the balanced transportation system that is desired?	Please clarify intent of word Balanced.	“Balanced” – to develop a multimodal transportation system with a higher proportion of alternative modes than in the 2008 transportation system in Pinal County.
305	173	Ryan Desmond, Vestar	Policy 4.1.1.4 revision and italicized to indicate private responsibility	Policy 4.1.1.4 revision and italicized to indicate private responsibility – Prior to preliminary plat approval or site plan approval, the following should be accomplished: generally evaluate the potential transportation impacts of all development proposals on Pinal County’s regional transportation system; generally describe potential impacts on single and multiple occupancy vehicular traffic, public transit, bicycles, and pedestrians; and generally evaluate proposed mitigation strategies which will be implemented later in the development process as presented in the development proposals for dealing with potential adverse impacts on congestion and mobility.	No change

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306	173	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	4.1.1.5 Encourage Pinal County's development pattern to support a diverse range of travel modes. Develop a County-wide transportation system that meshes with local systems that meet each community's local mobility choices and needs.	We support this policy but wish to encourage more emphasis on non-auto related modes of transportation.	No change; the modes are emphasized
307	173	Court Rich, Rose Law Group	Clarify that evaluation of traffic impacts is not required in order to achieve a Comprehensive Plan designation.	Text changes and deletions on Policy 4.1.1.4	No change
308	174	El Dorado Holdings and Consultants	Policies 4.1.1.8 and 4.1.1.9 - Please address what will happen to existing PAD's with regard to these policies.	Need to address existing PAD's.	Modified policies
309	175	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	4.2.1.2 Provide an enhanced public transportation system (local transit, carpool and park-and-ride lots, express bus or BRT, intercity bus, and commuter/intercity rail) that provides connections within the County and throughout the region.	We support this policy but wish to encourage more emphasis on non-auto related modes of transportation.	Comment
310	175	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	4.2.1.3 Support implementation of Phoenix-Tucson intercity passenger rail service.	We support integrating mass transit systems with Maricopa and Pima counties; including bus service, light rail, ride share, etc.	No change
311	175	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	4.2.1.5 Preserve sites for a suitable array of transit centers in the unincorporated County areas and coordinate with the cities and towns development of other transit centers.	We support this kind of proactive planning for incorporating as many modes of mass transportation as possible throughout the region.	No change
312	175	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	Sonoran Institute is very supportive of Policy 4.2.1.3 Support implementation of Phoenix-Tucson intercity rail. We are also supportive of Policy 4.2.1.6 which encourages connections in Pinal County with both Phoenix and Tucson.	One suggestion would be to add working with other stakeholders such as Cities, Towns, and Interested Organizations with the listed COG's on the commuter rail project.	Modified policy to add other stakeholders
313	176	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	4.2.1.15 Encourage shade and landscaping along sidewalks and multi-use paths, as opposed to bare block or stucco walls that radiate more heat at pedestrian and bicyclist level.	We believe this is a great example of de-emphasizing the automobile and making our communities more pedestrian oriented and of pedestrian scale.	No change
314	176	El Dorado Holdings and Consultants	Policy 4.2.1.10 "Act now to preserve sufficient rights of way for adequate corridors to be as demand warrants." Please address how the additional ROW needed to go from an arterial street to a parkway or future high capacity freeway will be acquired.	ROW acquisition above and beyond that which would normally be required (typically an arterial street) needs to be addressed.	See page 36 of Regionally Significant Routes for Safety & Mobility Access Management Manual (RSRSM)
315	176	Court Rich, Rose Law Group	We agree with but that are simply out of place in the plan. Discussions about providing shade on roadways or walkways are better suited for a subdivision ordinance or design guidelines.	Deleted Policy 4.2.1.15	No change
316	177	Ryan Desmond, Vestar	Policy 4.2.2.1 recommended text change	Policy 4.2.2.1 recommended change – Require new developments to encourage a variety of modes of transportation including transit, pedestrian	Incorporated change



#	Text	Source	Comment	Suggested Action	Comments Addressed
317	177	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	4.2.2.2 Establish requirements for Transit Oriented Development (TOD) site development.	and bicycle trips. We would like to see more emphasis placed on the ideas related to Transit Oriented Development. Smart planning of TOD areas can completely transform how our communities can be designed and how they can grow.	Comment no change
318	177	Court Rich, Rose Law Group		Change "Require" to "Encourage" on Policies 4.2.2.1 and 4.2.2.3	Incorporated change
319	177	Court Rich, Rose Law Group		Change "Plan for" to "Study a potential" in Objective 4.2.3	Modified objective
320	178	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	4.3.1 Objective: Provide for non-motorized modes of transportation through the designation of bike lanes and bike routes, as well as the construction and expansion of bicycle	We support this kind of thinking in community planning. When combined with elements of open spaces, not only does this provide an alternative means of transportation, but low-cost and healthy recreation.	Comment no change
321	179	Court Rich, Rose Law Group		Add "Where appropriate" to start of Objective 4.4.1	Incorporated change
322	179	El Dorado Holdings and Consultants	Noise - explain who will be responsible for the noise mitigation. It is not necessarily a project's development that creates the need for the noise mitigation, but rather the background traffic generated by non-adjacent projects.	How will the noise mitigation measure be paid for?	Not part of the Comprehensive Plan
323	180	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	4.5.1.1 Require developments and public community facilities to include amenities that encourage using rail, bus transit, bicycles, and walking as alternative forms of transportation.	Vital element in helping to secure healthy air quality for our communities and for limiting traffic congestion.	Comment no change
324	180	Ryan Desmond, Vestar	Policy 4.5.1.1 recommend text change	Policy 4.5.1.1 recommend change "and" to "or" – Require developments and public community facilities to include amenities that encourage using rail, bus transit, bicycles <u>or</u> walking as alternative forms of transportation.	Modified text
325	180	Scott DiBiase	4.5 Goal – recommend rewording	4.5 Goal – recommend rewording – Pinal County will preserve clean air in attainment areas and achieve maintenance status on the schedules outlined in the State Implementation Plan(s) in those areas that have been designated nonattainment areas."	Incorporated change
326	180	Court Rich, Rose Law Group		Change "will" to "are encouraged to" in Objective 4.4.2	Incorporated change
327	180	Court Rich, Rose Law Group		Change "in general" to "where reasonable" in Objective 4.5.1	No change
328	180	Court Rich, Rose Law Group		Change "Require" to "Encourage" in Policy 4.5.1.1	Modified policy
329	183	Court Rich, Rose Law Group	Disagree with the language about the labor force.	Text changes and deletions on last paragraph	No change



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330	183	Kazi Haque, Planning Manager City of Maricopa	The goals and objectives are well placed to address future growth and employment needs.	Comment no change suggested	Comment no change
331	183	S. Odette, APS	The Economic Development Element looks good.	No changes recommended.	Comment no change
332	183	CMX	"Residential growth will spur an increase in retail and service business activities, but a well rounded economy requires more." The main point is correct: a balance is necessary between all land uses for a healthy economy. This is not reflected in the Plan map.	State this more directly and account for greater diversity of land uses in the land use plan. Additionally, the current depiction of land uses in the Plan's maps and the requirements for deviating from low moderate residential may deter businesses.	No change made
333	184	El Dorado Holdings and Consultants	See comments above regarding balancing residential growth with job creation and the 500 jobs per 1000 population.	See suggestions above.	No change made
334	184	Court Rich, Rose Law Group		Text changes and deletions all paragraphs	Modified text
335	185	CMX	The relationship to Pinal County's Vision and the definition of economic sustainability identifies "environmentally friendly employers who champion Pinal County's conservation philosophy."	Strengthen and build on this sector by encouraging the creation of green collar jobs, attracting producers of renewable energy, etc.	No change; Agreed text addresses this direction
336	186	Court Rich, Rose Law Group		Text changes and deletions paragraph 1, 2, 4	Modified text
337	189	CMX	First and last sentences on page: "Attracting and retaining businesses...educational background and skills." and "In order for Pinal...skilled workforce will be paramount."	Tie these sentences with the rest of the paragraph, identifying how these hinge on other elements, e.g. Quality Education.	Deleted last sentence
338	189	CMX	The data provided in Table 5-3 does not indicate "a strong increase in production occupations."		Deleted sentence
339	190	CMX	Last sentence: "However...grow and expand." Run-on sentence, but again not fully supported by rest of section or subsequent policies.	Revise.	Sentence revised
340	190	El Dorado Holdings and Consultants	Last sentence of bottom paragraph, "However in order to attract companies that pay higher wages, Pinal County, in concert with its economic development partners, will need to focus its efforts on advancing ...expand." Who are economic development partners?	Please provide information on who the economic development partners are.	Partners = business community, economic development corporations, AZ Department of Commerce, etc.
341	191	Court Rich, Rose Law Group		Use "Encourage" to start bullets 1, 2, 4	Incorporated changes
342	191	El Dorado Holdings and Consultants	"Preserve employment land for future opportunities (land banking large sites)." Please explain how this will work. What is the incentive for a property owner to land bank the employment land or is it the intent that it will be mandated? Is that legal? How will existing PAD's be handled?	Please provide additional information on this.	No change; County needs to preserve employment designated areas to ensure that people can live/work in Pinal County
343	191	CMX		Delete "when possible" from the 6th bullet.	Incorporate change
344	193	CMX	Policy 5.1.1.5 "Encourage the establishment and recruitment of...'green' industries..."	Yes. Suggest providing guidance through policy measures that establish how this will be accomplished.	No change



#	Text	Source	Comment	Suggested Action	Comments Addressed
345	194	Tom Collazo, Associate State Director for Conservation		Page 194: Consider adding language under 5.1.2 that emphasizes the importance that wildlife watching and passive outdoor recreation, such as trail riding, bird watching, hiking, cycling, angling, and hunting, are as a potential economic driver for the county.	Incorporated change
346	194	Court Rich, Rose Law Group		Change "classification" to "switch" in Policy 5.1.1.6	No change
347	194	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	5.1.2.1 Support a tourism corridor within the eastern County that stretches from Florence Junction through Superior to Dudleyville to Oracle and Oracle Junction. This should incorporate visitor destinations such as future state parks, rock climbing, arboretum, the Ore Cart Trail, future hotels, etc.	While we see the need to include tourism as a viable means of economic prosperity for Pinal County, we would like to see measures taken to encourage mass transit modes of transportation for tourist travel within the corridor.	Incorporated new policy; modified objective
348	194	El Dorado Holdings and Consultants	Policy 5.1.1.7 this is shown as a Public responsibility. Why isn't this a Shared responsibility?	This should be a Shared responsibility.	Modified policy
349	195-196	Court Rich, Rose Law Group		Text changes and deletions under Employment Land Preservation	Change made
350	195	El Dorado Holdings and Consultants	Policies 5.1.3.1 thru 5.1.3.3 - How soon will these policies be implemented? The County is wanting the property owners to preserve land (land bank) for employment, but has nothing in place to attract the employment.	If this Comp Plan is adopted, but these policies are not immediately adopted and effectively implemented, property owners will not be willing to set aside land for employment.	If the Plan is approved, these items should be implemented early in the process.
351	195	CMX	5.1.3 Objective and policies	Add policy establishing incentives for renewable energy and green collar jobs.	Added new policy
352	196	CMX	Policy 5.2.1.2	Suggest identifying the tools and mechanisms that will foster preservation of employment lands.	No change
353	196	El Dorado Holdings and Consultants	Policy 5.2.1.2 Enable tools and mechanisms, which will foster the continual preservation of employment lands and their development." What are the tools and mechanisms?	Please provide definition of the tools and mechanisms.	No change
354	197	Court Rich, Rose Law Group		Text changes and deletions under Objective 5.3.2 and Policy 5.3.2.1	Modified text
355	197	El Dorado Holdings and Consultants	Policy 5.3.2.1 "Approve development in a pattern that avoids the need to extend infrastructure excessive distances to provide service and support." Please define "excessive".	Would this policy prohibit projects such as Anthem? Please clarify.	Modified text; A Master Planned Community could show, through the amendment process, how they would provide amenities, infrastructure and services for the community.
356	197	CMX	Policy 5.3.2.1	While development that reduces the need to extend infrastructure makes sense fiscally, compact development and multi-modal connectivity also promote tenets of Smart Growth, which are especially important in the small communities or undeveloped areas of the County.	Comment no change



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357	197	Ryan Desmond, Vestar	Policy 5.3.2.1 revise policy	Policy 5.3.2.1 revise policy – Approve development in a pattern that avoids the need to extend infrastructure excessive distances to provide service and support when considering: future contributions to infrastructure and services through construction and dedication of improvements; payment of development fees; and other mitigation measures to be implemented later in the development process.	Modified text
358	199	Kazi Haque, Planning Manager City of Maricopa	Per the Pinal County Comprehensive Plan and Vision as outlined in Chapter 3- "the philosophy is to concentrate higher density development in Pinal's central core while preserving East County's rural feel. It plans for the preservation of large swaths of open space by allowing higher density urban development in exchange."	However, the mechanism to acquire the open space is not discussed and the cost and affect of such exchange is not clear. It appears that some areas of the County may see more rapid loss of open space in an unbalanced manner compared to other areas.	No change
359	199	El Dorado Holdings and Consultants	Highlighted Text Box in right margin is modified from original to add the following text: "However, this chapter provides an understanding of open space and trails requirements that should be used when considering a Pinal County Project". Does the Comp Plan supersede the adopted Parks Plan? This language will lead to confusion about the priority of these two documents.	Remove the sections from the Comp Plan that are not consistent with the recently adopted Parks plan. The language contained in the original draft was acceptable.	No change; This document does not supersede the Open Space and Trails Master Plan. The changes which were made between the first and second drafts make the two documents more consistent.
360	199-221	El Dorado Holdings and Consultants	This Chapter contains significant revisions from the original draft of the Comprehensive Plan. After review of the spreadsheet of original comments submitted to the County, there were no significant comments relating to this Chapter, primarily because it mostly referenced the Pinal County Parks and Open Space Plan adopted one year ago. The revised Chapter contains further restrictions and requirements beyond the approved Parks Plan that were not contained in the first draft. We find it to be troublesome and out of the ordinary that new language that significantly alters the approved Parks Plan is added after the first draft without some specific notice to the stakeholders. In addition to this general comment, our specific comments are below.	Remove the sections from the Comp Plan that are not consistent with the recently adopted Parks Plan. The language contained in the original draft was acceptable.	No change; This document does not supersede the Open Space and Trails Master Plan. The changes which were made between the first and second drafts make the two documents more consistent.

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361	201-202	Tom Collazo, Associate State Director for Conservation		Pages 201-202: Omit references to federal enabling act and state constitution mandating that fair market value must be obtained from all trust land transactions. This is static, particularly under circumstances where state trust land laws are changed. This concept can be better expressed as "pursuant to state laws governing the sale and lease of state trust lands."	The wording in the second draft is correct as State Land is managed currently. If ASLD policies change in the future (as have been proposed several times recently) the existing statement would not be correct. The suggested language leaves room for future changes to ASLD policies and recommends that the changes be included.
362	202	Court Rich, Rose Law Group		Deleted last sentence of last paragraph	No change; we believe that this statement is correct.
363	205	El Dorado Holdings and Consultants	"Agricultural cannot remain financially viable without large open space in which it can be practiced." Is it intended that this Comp Plan defines Agriculture as open space? By identifying farm fields as open space is it the County's intent to require that the farm fields be preserved?	Please clarify intention here.	The plan does not include ag land as open space, unless done so by a municipality. It looks to a transition of that ag land in the future, keeping the ag land in production as long as possible.
364	207	CMX	The size and service area of Community Park and Regional Park seem high. In preliminary research, Community Parks should be 25+ acres with a service area of a 1-2 mile radius. I did not find one for Regional Parks. The NPRA does not calculate size based on SF/DU. I'm not sure it is equal. Reference is made to the Master Trails and Open Space document.		Sizes of parks and levels of service are from NRPA standards and benchmarking with similar communities which was part of the OS&T Plan work.
365	207-208	El Dorado Holdings and Consultants	The new language adds specific levels of acreage for various sizes of parks that are not contained in the adopted Parks Plan. County staff recently proposed similar standards in their recent attempt to revise the zoning ordinance. The open space section of the proposed zoning ordinance was one section that raised a significant amount of concern before it was placed on hold. The adoption of specific standards requires significantly more input an discussion before they are included as a late addition to the Comp Plan without any public discussion or justification. When the revisions to the zoning ordinance were put on hold, we were told that further discussion would occur before adoption.	Remove these park acreage standards.	This language and the various charts went through the public review and comment process as part of the Comprehensive Plan amendment process in 2007.



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366	207	El Dorado Holdings and Consultants	Table 6-3 desired level of public or private park land. Certainly neighborhood parks of 8 to 10 acres are typically private parks that are owned and operated by HOA's. Community Parks (60 - 100 acres) and regional parks (200+ acres) are most often Public parks that are owned and operated, in this case, by the County. An exception to this is a Community Park that is part of a large master planned community. However the 60 - 100 acres size maybe too large for a smaller master planned community. In most cases a Community Park that is constructed in a master planned community ends up being owned and maintained by the HOA and hence is not open to the public. Is it the County's intent to construct, own and operate Community and Regional Parks?	Remove the sections from the Comp Plan that are not consistent with the recently adopted Parks plan. The language contained in the original draft was acceptable.	It is the County's intent to be the regional provider of parks and trail amenities. Neighborhood and Community Parks would be the responsibility of incorporated municipalities and the development community.
367	207	Court Rich, Rose Law Group		Deleted last sentence of last paragraph	No change; This comes from the approved Open Space and Trails Master Plan.
368	208	Court Rich, Rose Law Group		Removed Park Acreage Needs Chart Deleted third and fourth sentence under Neighborhood and Community Parks	No change; This comes from the approved Open Space and Trails Master Plan.
369	208	El Dorado Holdings and Consultants	Table 6-4 how was acres needed by 2025 determined? Where did standards come from? There are some homebuyers that do not desire and hence would not use the neighborhood or community park. How was that factored in.	Please clarify intent.	The intent of this text is to help to ensure that Pinal County residents have access to an appropriate amount of recreational infrastructure and amenities. Level of service guidelines developed as outlined above in item 3654.
370	208	El Dorado Holdings and Consultants	First sentence, first paragraph "Pinal County's Neighborhood and Community Parks are to be provided through private development. Parks that are provided by private development are typically owned and operated by the projects HOA and funded by HOA dues. If it is the County's intent to require these parks to be open to the public, the parks will need to be deeded to the County and the County will need to operate and maintain.	Please clarify intent.	It is the County's intent to be the regional provider of parks and trail amenities. Neighborhood and Community Parks would be the responsibility of incorporated municipalities and the development community.
371	208	CMX	Regional Parks - not easy to distinguish locations of planned parks.	Provide locations in the land use plan.	The OS&T Plan map will be added to Chapter 6.



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372	210	CMX	Bajadas	Recommend the following definition: The areas outlined may actually be a piedmont plain, a region extending from the mountain front to the basin floor which includes pediments, old fans, alluvial fans, bajadas and distributary-flow areas. Pediments are a relatively flat level surface of bedrock (exposed or veneered with alluvial soil or gravel) occurring at the base of a mountain or as a plain having no associated mountain. These areas can range from large-scale features such as plains and mountains to minor features such as rolling hills, valleys, washes and flat level land.	No change; We believe that the current text is simpler, yet still functional.
373	211	CMX	41% of Pinal County is existing, planned, or proposed as open space within this plan. Is that realistic? Will GPAs be allowed to increase density from 1 du/ac? If so, will it be haphazard development?	Coordinate this Plan with ASLD and BLM. See the comment relating to page 46.	The Plan as well as the OS&T Plan discusses the need to coordinate with both BLM and ASLD in order to implement the open space vision.
374	214	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	6.1 Goal: Develop a connected system of open space areas that protect and conserve natural, physical and social resources.	We strongly support the implementation of this goal and means of ensuring its viability through perpetuity. Include specific policy language from the Pima County Special Area Policy Conservation Lands System section within the Pima County Comprehensive plan.	Comment no change; Implementation of policies to support these goals has begun with the draft Ordinance revision including the Recreation Area Design Manual. Comments or suggestions on specifics within this document are welcome.
375	214	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	6.1.1.9 Develop open space and trail standards and criteria to provide sufficient buffer zones relative to roadways, river and wash corridors, critical habitat, sensitive lands, and development areas.	We would especially like to see this policy associated with development near federal and state publicly protected lands such as the Ironwood and Sonoran Desert National Monuments.	Comment no change; Implementation of policies to support these goals has begun with the draft Ordinance revision including the Recreation Area Design Manual. Comments or suggestions on specifics within this document are welcome.
376	214	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	6.1.1.1 Adopt special regulations for development in areas of critical habitat value and in wildlife movement corridors.	We not only support this policy, but wish to see it strengthened and expanded to all natural habitats and valuable ecosystem areas. See our comments for p. 97.	Comment no change; Implementation of policies to support these goals has begun with the draft Ordinance revision including the Recreation Area Design Manual. Comments or suggestions on specifics within this document are welcome.



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377	214-221	El Dorado Holdings and Consultants	The Goals, Objectives and Policies have substantial changes beyond the recently adopted Parks Plan. Most notable are the inclusion of many wards that would mandate compliance with Objectives and Policies. Where the adopted Parks Plan uses words like develop, identify and promote when discussing new policies and standards, the Comp Plan often uses the words provide, require and establish to implement standards.	Revise to delete references to mandatory requirements. Mandatory provisions are better suited to specific ordinances that can be appropriately discussed in a specific forum, rather than a Comp Plan document.	No change; We believe that the language in the Plan is in keeping with the spirit and intent of the OS&T Plan.
378	215	Court Rich, Rose Law Group		Text changes and deletions to Policies 6.1.1.4 – 6.1.1.8	Changes incorporated
379	215	CMX	6.1.1.5 - Require developers and other land owners to plan for key contiguous open acre areas, corridors and/or linkages during the zoning stage.	General locations would be prudent, although during the zoning stage exact locations would be difficult without a specific site plan.	No change; The specifics for identifying recreation and open space areas within rezone requests will be clarified through the revised Zoning Ordinance.
380	215	El Dorado Holdings and Consultants	6.1.1.4 "Provide contiguous open space through close coordination between development projects." and 6.1.1.5 "Require developers and other land owners to plan for key contiguous open acres areas, corridors and / or linkages during the zoning stage. "Use of the words "provide" and "require" creates a mandate regarding the provision of "contiguous" open space.	Use the word "Encourage" instead of "Provide" and in 6.1.1.5 suggest revising to "During the zoning stage, plans should be reviewed to incorporate contiguous open space where possible."	Changes incorporated
381	216	El Dorado Holdings and Consultants	6.1.2 Objective "Preserve, protect or conserve the existing natural drainage system."	Need to define the word "natural". The drainage washes that have been altered due to agriculture should not be considered natural. See additional comment to page 224 below.	No change; If the drainage system has been altered through agriculture then it is no longer natural. The County will be looking for larger drainage features, natural or altered, to become community amenities.
382	216	Court Rich, Rose Law Group	Make it clear that landowners can remove their property from FEMA designated floodplain when necessary for development.	Text changes and deletions to Policies 6.1.2.1 and 6.1.2.2	No change; Text in the Environmental Planning Element, under Floodplain discusses the FEMA process
383	217	Court Rich, Rose Law Group		Text changes and deletions to Policies 6.2.1.1 – 6.2.1.5	Changes incorporated

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384	217	El Dorado Holdings and Consultants	Policy 6.2.1.5 - Policy relating to public access for all trails can create liability and maintenance issues for HOA groups in residential developments	County should acquire, maintain and indemnify any trails open to the general public. Language in Policy 6.3.1.4 is more appropriate.	No change; This policy addresses the need for agencies and the development community to "ensure that appropriate public trail connections and access points are planned, constructed and maintained." This is focused on the public trails, not all trails.
385	217	El Dorado Holdings and Consultants	Policy 6.2.1.5 - Policy relating to public access for all trails can create liability and maintenance issues for HOA groups in residential developments	County should acquire, maintain and indemnify any trails open to the general public. Language in Policy 6.3.1.4 is more appropriate.	See #384
386	217	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	6.2.1 Objective: Provide for a wide range of nonmotorized and motorized trail usages including hiking, equestrian, mountain biking and off-highway vehicles.	We wish to see an emphasis placed on keeping OHV uses to a minimum and only within specially designated areas. We strongly oppose any OHV use within protected or sensitive areas, or in the establishment of wildcat roads and trails. The county should assist with protecting key areas such as the Sonoran Desert National Monument, which is being abused significantly by OHVs.	No change; The OS&T Plan designates OHV routes within the proposed County Trail system. The OS&T Plan also points out that there may be additional opportunities to develop OHV areas within future regional parks. The OS&T Plan map will be added to Chapter 6 so that users will know where they can see the location of proposed trails.
387	218	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	6.3.1.5 Integrate parks and open space needs into the County's Capital Improvement Program (CIP).	We would like to see more emphasis placed on the funding sources for new parks, open spaces and the integration of both into the recreational portfolio for the county.	No change; The County has integrated Parks and Trails into the Development Impact Fee structure and is exploring other alternatives for funding and implementing the goals and policies within this chapter.
388	219	Court Rich, Rose Law Group		Change "Require" to "Encourage" in Policy 6.4.1.1	Change incorporated
389	223	CMX	"The Plan places a high priority on intergovernmental and interagency communication and cooperation."	This is a necessary role of the Plan and the County. Suggest creating policies to better reflect this statement.	No change; The necessity of intergovernmental and interagency collaboration and communication is woven throughout the document.



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390	223	Dave Richins, Sun Corridor Legacy Program Director, Sonoran Institute	Environmental Stewardship section links values of strong conservation ethic with an ambitious statement for Pinal County to be a leader in environmental stewardship.	Additional commentary on how this could be accomplished would be welcome.	No change; This comment asks for additional commentary on how Pinal County will accomplish the Comprehensive Plan stated intention to be "a leader in environmental stewardship." The implementation of the plan goals and policies is best reflected in Chapter 10, Implementation and Appendix A, Comprehensive Plan Compliance Checklist. These areas of the Comprehensive Plan will provide Pinal County with the focus and result measurements provide leadership in all of the Vision areas, including environmental stewardship.
391	224	El Dorado Holdings and Consultants	Floodplains - Prior Sept 2008 comment is repeated here, because entire comment was not incorporated into comment matrix and the portion that was included was misquoted. Prior comment - "Many of the agricultural areas in Pinal County have disturbed the drainage ways and hence have altered the natural drainage patterns. In many of these locations storm runoff is diverted around agricultural fields and conveyed in manmade ditches along section lines. The floodplains associated with these altered drainage ways should not be considered environmentally sensitive lands and should be allowed to be channelized to remove land from the 100-yr floodplain through the FEMA regulated process. Is it the Counties intent to prohibit a landowner from going through the Federal regulated FEMA CLOMR / LOMR process of removing property from the floodplain? Wouldn't this create an issue with Proposition 207 and potential claims for diminution of property value?"	Language needs to be added to the Comp Plan addressing this. See also comments to page 216, 235 & 236.	No change; If the drainage system has been altered through agriculture then it is no longer natural. The County will be looking for larger drainage features, natural or altered, to become community amenities.
392	225	Court Rich, Rose Law Group		Add "and should" between can and be in last sentence of second paragraph	Incorporated change



#	Text	Source	Comment	Suggested Action	Comments Addressed
393	227-228	El Dorado Holdings and Consultants	Land Subsidence and Earth Fissures - Last paragraph, last sentence - "Development on lands that are undergoing groundwater pumping require special consideration during ... to safeguard people and property from the hazards." This statement is misleading and implies that development of any land where groundwater has been pumped requires special consideration during the design-development process, when in fact it is the land that has experienced subsidence and / or earth fissures that requires the special consideration.	Delete the words " groundwater pumping" and replace with "subsidence and earth fissures".	Incorporated change
394	228	El Dorado Holdings and Consultants	First paragraph, last sentence - "Preventative measures and engineered solutions would only be effective if all land managing entities involved worked together to address the hazards." Preventative measures may require surrounding (not all) land managing entities involvement to address the hazards, but engineered solutions can be successfully designed on a site specific basis and do not require all land managing entities involvement.	Revise sentence to read: "Preventative measures may only be effective if surrounding land managing entities involved work together to address the hazards."	Incorporated change
395	228	CMX	Last sentence under Steep Slopes heading: "affects the slope stability several federal agencies and creates significant visual scars."	Remove "several federal agencies."	Incorporated change
396	230	Kazi Haque, Planning Manager City of Maricopa	Air Quality: Environmental Planning and stewardship is a major factor when it comes to sustainability. This section of the Pinal County Comprehensive Plan does little to no analysis of existing conditions or identifies possible issues in the future. For example, Air Quality in Pinal County will reach precarious levels of non-attainment if future mitigation and remedial steps are not strictly enforced. The goals and objectives outlined in this chapter is passive, i.e., the choice of words such as "maintain", "promote", "support", "consider" and "encourage" does not reflect the seriousness and causation of what is already known and should consider clear policies based on action. The EPA (Environmental Protection Agency) has already issued warning and called out specific areas in Pinal County as non-attainment areas and it requires immediate steps for mitigations and action.	The Plan's Goals and Objectives should incorporate more stringent clause for adoption and enforcement of stricter code for air quality mitigation.	No change
397	231	Scott DiBiase	3 rd paragraph, second sentence modify	3 rd paragraph, second sentence add – Unpaved roads be included to the list of source of particulate matter. Also include the mention of the imminent EPA PM10 nonattainment designation in this section.	No change



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398	232	CMX	"These transportation modes are essential for Pinal County's future and noise is an impact that cannot always be avoided but it can be mitigated."	Not sure use of rubberized asphalt is the best way to address traffic noise near residential areas; suggest providing policies with greater scope.	No change
399	232	Scott DiBiase	Top paragraph, first sentence reword	Top paragraph, first sentence reword – "Air quality issues are not limited to the physical location of the source and the effects of air pollution can (and often do) cross jurisdictional boundaries."	No change
400	235	El Dorado Holdings and Consultants	Steep Slopes - the last sentence does not make sense.	Suggest removing the words "several federal agencies" from sentence.	Modified text
401	235	El Dorado Holdings and Consultants	Policy 7.1.1.1 "Identify and coordinate with all land-managing entities and potential stakeholders affected by environmental hazards." Statement needs clarification. "Identify" what, environmental hazards? This section, "Environmentally Sensitive Areas" includes floodplains, riparian areas, wetlands, subsidence and earth fissures, steep slopes, critical habitat areas, wildlife linkages, vegetation, air quality, noise, dark skies and solid waste, but nowhere does it define environmental hazards. Are all the items identified in this section considered environmental hazards???	Define environmental hazards. Sentence begins with "identify", identify what?	Modified policy to encourage coordination
402	235	El Dorado Holdings and Consultants	Policy 7.1.1.2 "Encourage mitigation of environmental hazards subsidence or fissure zones...." Please define environmental hazards. Please explain what mitigation of subsidence or fissures zones would be considered.	Please clarify. Please give examples of types of mitigation.	Modified text
403	235	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.1 Goal: Environmental stewardship is part of all decisions made and Pinal County has become a model for sustainability, with environmentally sensitive County codes, policies, and ordinances.	We would like to see this as a mandatory part of the entire planning and design process. Pinal County is at an important juncture in which its decisions today can help make it unique in the country as far as its friendly and supportive relationship with the incredible environment in which it exists.	Comment noted
404	235	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.1.1.3 Promote planning decisions that consider alternatives that would minimize impacts to environmentally sensitive areas.	We would like to see this modified to read "Strive to eliminate the fragmentation of wildlife habitat..." As such we support the sentiment of this policy. This policy should also incorporate recommendations for consulting with Arizona Game and Fish..	See Policy 7.1.1.4
405	235	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.1.1.4 Minimize the fragmentation of wildlife habitat and support efforts to maintain or restore connectivity among habitats.	We would like to see this modified to read "Strive to eliminate the fragmentation of wildlife habitat..." As such we support the sentiment of this policy. Include specific policy language from the Pima County Special Area Policy Conservation Lands System section within the Pima County Comprehensive plan.	Incorporated change
406	235	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.1.1.4 Minimize the fragmentation of wildlife habitat and support efforts to maintain or restore connectivity among habitats.	Please incorporate statements related to the scientific justification for eliminating the fragmentation of wildlife habitat to eliminate any less than authoritative opinions on what these definitions mean.	No change



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407	235	Tom Collazo, Associate State Director for Conservation		Page 235: We appreciate the spirit and intent of Objective 7.1.1. We encourage strengthening the Objective to read: "Promote ecologically responsible development patterns within Pinal County by utilizing the best available scientific information to avoid, minimize or mitigate impacts to environmentally sensitive areas." In Policies 7.1.1.2, -3 and -4, consider rewording to spell out that, in each instance, development planning should seek to "avoid, minimize or mitigate" impacts on the environmental features that the policy addresses. We would further point out that the first preference is to avoid, second preference is to minimize (if avoidance is impossible), and the third preference is to mitigate. Lastly, we suggest expanding Policy 7.1.1.5 to include maintaining up-to-date linkages to other databases on wildlife and habitat inventories from sources such as the Arizona Game and Fish Department, NatureServe and The Nature Conservancy.	Incorporated change
408	235	El Dorado Holdings and Consultants	Policy 7.1.1.3 "Promote planning decisions that consider alternatives that would minimize impacts to environmentally sensitive areas." Please provide examples of these types of planning decisions.	Please clarify what is meant by planning decisions by providing examples.	Modified policy
409	236	El Dorado Holdings and Consultants	Policy 7.1.1.6 "Promote planning decisions that consider impacts to the entire landscape, not just specific development sites." What does this mean? How does the planning of a project consider the "entire landscape"? Who defines entire landscape? Please provide examples of these types of planning decisions.	This policy is too broad and subjective and should be deleted.	No change
410	236	El Dorado Holdings and Consultants	Policy 7.1.1.7 "Consider maintaining open space on lands that are environmentally sensitive due to steep slopes, floodplains, watersheds and habitat areas." The prior policy read: "When possible, utilize areas like floodplains for open space, recreation, community amenity sites and other complimentary uses." There is a huge contrast between the two policies. Is the County willing to acquire the steep slopes, floodplains, watersheds and habitat areas in order to maintain them as open space?	This policy is too broad and subjective and should be deleted.	No change



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411	236	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	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 decisions that minimize disturbance to riparian areas and wetlands. 7.1.2.5 Support continuing environmental research regarding the Sonoran Desert	Right on! Only we would like to see much more emphasis on these policies and efforts to make them mandatory practices.	Comment no change
412	236	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.1.3.1 Work cooperatively with the Arizona Department of Environmental Quality so that Pinal County air quality standards meet state and federal standards and are consistent with standards in neighboring counties.	We would like to see more proactive measures mentioned in this policy to allow Pinal County to take the lead in ensuring high air quality and conformance with high air quality standards.	Pinal County will meet air quality standards while seeking economic development opportunities so that jobs can be provided for our citizens.
413	236	Scott DiBiase	Policy 7.1.3.1 – Revise for accuracy	Policy 7.1.3.1 – Revise for accuracy – Work cooperatively with the Arizona Department of Environmental Quality so that Pinal County air quality meet federal standards and are consistent with air quality in neighboring counties.”	Incorporated change
414	236	El Dorado Holdings and Consultants	Policy 7.1.2.4 "Promote planning decisions that minimize disturbance to riparian areas and wetlands." Please provide examples of these types of planning decisions. What does staff have in mind?	Please clarify what is meant by planning decisions by providing examples.	Modified text
415	236-239	El Dorado Holdings and Consultants	Please explain how a proposed development would comply with Objectives 7.1.3 thru 7.1.7 and the associate policies? These are all in italics and hence are Public Responsibility.	Please clarify.	The Comprehensive Plan is designed to be an overall policy document. Specifics on the implementation of this policy will need to be worked out over time.
416	236	Court Rich, Rose Law Group		Change font on Policy 7.1.2.4	Incorporated change
417	237	El Dorado Holdings and Consultants	Policy 7.1.4.1 "Encourage use of rubberized asphalt pavement on heavily-traveled roads near residential developments." Define heavily-traveled roads. Is the intent on freeways and using rubberized asphalt over concrete, such as what ADOT has done or is the intent to require rubberized asphalt on any heavily traveled road? Who will be responsible for the additional cost of the rubberized asphalt?	This policy is too broad and subjective and should be deleted or more definition should be provided.	No change
418	237	CMX	Policy 7.1.3.7	Cannot stand alone; requires coordination with economic development and housing.	All policies are interrelated

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419	238	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.1.5.3 Encourage a collaborative working relationship with neighboring counties and Native American communities to protect dark skies in Pinal County and the surrounding region.	We support this policy and would like to see Pinal County encourage its neighbors to the north to do the same.	Comment no change
420	238	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.1.7.1 Support programs at higher education institutions that promote research and awareness of Pinal County's natural environment.	We would like to see Pinal County and its municipalities not only support such efforts but also look to proactively fund and develop programs that promote research and awareness of the natural environment and why it is so unique to Pinal County, Arizona and the planet.	Comment no change
421	239	El Dorado Holdings and Consultants	Policy 7.1.7.2 "Encourage programs that engage young people and students." Engage in what?	Please clarify.	Modified text
422	239	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.1.7.4 Support eco-tourism efforts and venues such as the Boyce Thompson Arboretum and the Biosphere II.	While eco-tourist venues can have both an environmental and economic value, every effort should be taken to make sure the impact of such tourist activities on the environment is kept to an absolute minimum (ie reduced need for parking, designated tour areas, avoidance of sensitive areas, etc).	Comment no change
423	240	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.2.6.1 Explore making policy that will require a demonstration of physically available water supplies prior to approving an application for zoning or rezoning within the unincorporated areas of Pinal County. If allowable under law, the County Board of Supervisors should consider incorporating this requirement into its zoning application process.	Don't just explore. Make this mandatory. All development should have a real and assured water supply and it should be viewed in the context of what is really sustainable.	Comment noted. Sustainability and assured water supply are not the same thing.
424	241	Kazi Haque, Planning Manager City of Maricopa	Another issue is in regards to water resources and the proliferation of residential development. The Plan does not identify how the increase in allowable density, proposed in the land use plan will be mitigated. For example, page 241-242 (Water Resources), Chapter-7 states: <i>In the Pinal AMA, the management goal is "to allow development of non-irrigation uses and to preserve existing agricultural economies in the AMA for as long as feasible, consistent with the necessity to preserve future water supplies for non-irrigation uses."</i> What does it mean and who controls the uses, and who is the regulating body in charge? Are there any supporting data/documents that can verify this statement and for it's prolonged use? The Water Resources section requires further review and refinement to be consistent with ADWR (Arizona Department of Water Resources) sustainable standards.	Clarification requested	Reference is from the Pinal AMA, which is State Statute and managed by ADWR. ADWR does not have "sustainable" standards, only adequate and assured water supplies which require either adequate or assured water supplies for 100 years. ADWR reviewed the Draft Plan and made comments that have been incorporated.

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425	241	Bryan Hartman, President and Brian Betcher, General Manager; Maricopa-Stanfield Irrigation & Drainage District	Irrigated agriculture has and will continue to be a key element in the economy and future water planning for Pinal County, especially in the next 10 to 20 years. The General Plan seems to ignore that fact by choosing to focus on water for development. Water for development is going to come primarily through the transition process of farmland being retired, over time, in favor of development. How that transition is handled and managed by the County is going to be critical to the long term ability of Pinal County to sustain healthy development.	Add specific language including goals and objectives if warranted that places a priority on preserving the County's agribusiness and agricultural heritage for as long as economically feasible. This language should also include specific reference to protecting irrigation water rights on agricultural farmland from being retired before development is actually ready to occur.	Language being requested is already in State Statute as the stated groundwater management goal for the Pinal AMA managed by ADWR. As for protecting groundwater rights on agricultural lands that is governed by ADWR's administrative rules and the County has no legal jurisdiction to control the process. The current rules "reward" early, extinguishment of water rights based on credits awarded as recently revised and adopted by ADWR in October 2007.
426	241-251	El Dorado Holdings and Consultants	Support comments submitted Ms. Shilpa Hunter-Patel is far more qualified to comment on the Water Resources Section than the El Dorado Holdings employees who have commented on the rest of the Comp Plan.	We suggest that a small subcommittee made up of individuals from the public and private sector be formed to work through the issues in this section.	Noted
427	241	Robert Simpson	The Water Resources Chapter is a substantial improvement over its predecessor, particularly in proposing measures to ensure some level of water supply outside of AMAs. It clearly recognizes that, whatever the future population growth of the County, water will need to be imported to meet future needs.	However, it fails to address, as other jurisdictions are now addressing, interim measures that will be needed to protect the water security of the both current and future residents of the County. Please consider (see letter 12/13/08 for more detail comment): 1. Existing state water statutes are inadequate. 2. The Pinal Plan defers too much to the role of the State. 3. Other jurisdictions are going beyond state regulations.	1. State Statutes are addressed at the legislature. 2. The Pinal County Plan cannot trump state statute. 3. Unaware of where this occurring.
428	243	Court Rich, Rose Law Group		Text changes and deletions in last paragraph	No change
429	243-245	Court Rich, Rose Law Group	We suggest including references to state law which requires all development to provide water so as to clearly set out that water supply is regulated on a state level. Further, there are some pretty negative assumptions made that are not necessary and represent opinion rather than fact.	Changes and deletions under Relationship to Pinal County's Vision	No change



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430	243, 246-251	James Poulos, Robson Communities and its affiliates	<p>The October 2008 draft Comprehensive Plan requires analysis of assured water supply at zoning submittal and also requires new wastewater treatment plants to do reuse and recharge. Reuse and recharge requirements are unnecessary limiting as ADEQ regulations also allow surface water discharge. The real trouble is that this creates a new level of governmental involvement with waste and wastewater regulation, which is already under the jurisdiction and expertise of ADEQ and ADWR. Similarly, the suggestion that the County lobby the ACC to have water providers be designated water providers, which is of no benefit or detriment to the County, again involves the County in an area that is already regulated by the ACC and ADWR. It is also inconsistent that the analysis of assured water supply is good for ten years but the zoning can be revoked prior to ten years. The result would be that the land could be tied to the analysis of the assured water supply despite the revocation of the zoning.</p>	Check language	<p>No change; The point is that discharge of reclaimed wastewater, without intent to either directly use or to store underground, is simply a waste of sustainable resource. The policy provides the opportunity through its 208 review authority to “encourage” the reuse and/or recharge of reclaimed wastewater. The “governmental involvement” already exists at the County level. Having water providers be designated protects unaware homeowners who buy property that is enrolled in the CAGR from assuming a property specific tax for groundwater use where not served by a designated provider. Encouraging ACC to provide the cost recovery associated with maintaining designations for private water companies removes at least one financial impediment for the designation. Furthermore, water providers can then pursue the acquisition of renewable resources where individual property owners cannot, and currently non-designated provided have no incentive to do so. As for an Analysis of Assured Supply, it can be withdrawn by the property owner or by ADWR if need be – it is not permanently attached for 100 years if it is not needed.</p>



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431	246	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.2 Goal: To protect the long-term water supply for Pinal County	This Goal must be modified to include the protection of a long-term water supply as both a resource for human consumption AND the natural environment that also depends on the sufficient supply of water for its health and survival. We can no longer separate human and natural needs for water in our development of water policies.	No change; this stated goal does not discriminate water use sectors; it speaks to all water use in Pinal County. See objective 7.2.4. The natural environment is intended and implied.
432	246	Court Rich, Rose Law Group		Change "shall" to "may" in Policy 7.2.1.1	No change
433	246	Court Rich, Rose Law Group		Delete "the maximum" in Objective 7.2.2.	No change
434	246	Ms. Shilpa Hunter-Patel, Attorney with Fennemore Craig for El Dorado Holdings, Inc.	For areas outside of AMA's, regardless of whether or not the County elects to require an adequate water supply before platting, it is critical that the County not alter the timeframe for demonstrating an adequate water supply before ADWR.	Refers to Objective 7.2.1 and Policy 7.2.1.1 – We stress that if the County wishes to adopt a requirement mandating adequate water supply demonstrations for the areas outside AMA's, the requirement should remain as set forth under current law, i.e. at the time of platting, not zoning.	No change; Current law (ARS 45-108A) requires "prior to recordation of the plat." It does not specify at what point prior to recordation.
435	246-249	Ms. Shilpa Hunter-Patel, Attorney with Fennemore Craig for El Dorado Holdings, Inc.	We support the County's efforts to encourage conservation of water resources; moreover, we also believe it is critical for the County to actively participate in statewide efforts to provide for additional resources to meet the future needs of development within the County.	Refers to Objective 7.2.2 and Policy 7.2.2.1 and Objective 7.2.4 and Policy 7.2.4.1	Comment no change
436	247	Ms. Shilpa Hunter-Patel, Attorney with Fennemore Craig for El Dorado Holdings, Inc.	The County should leave highly technical issues related to the selection of methodology for disposal of reclaimed water to the appropriate regulatory agencies with oversight authority; accordingly, the Plan should not prohibit the ability to conduct surface discharge when economically reasonable.	Refers to Policy 7.2.2.2 – We stress that the County should not adopt a policy that essentially eliminates a viable, reasonable, and cost effective method for handling treated wastewater. The County should instead defer on this matter to the agencies with adequate regulatory programs for regulating wastewater, which includes the ADEQ, ADWR and the AZ Corporation Commission.	No change;
437	247-248	Ms. Shilpa Hunter-Patel, Attorney with Fennemore Craig for El Dorado Holdings, Inc.	The County's Plan should not adopt a policy that favors one type of water provider business model over another (i.e. favor Designated providers over water providers that serve subdivision's with Certificates of Assured Water Supply).	Refers to Objective 7.2.3 and Policies 7.2.3.1 and 7.2.3.2 – We are extremely troubled by these proposed objectives and policies. We do not believe there is any rational basis for the County to discriminate against water providers whose business model does not include obtaining a designation over those providers that do. We must assume, therefore, that the reasoning behind the objective and policies is the result of a mistake regarding the nature of a Designation of Assured Water Supply issued by ADWR, verses proving the same 100 year assured water supply for new development via a Certificate of AWS.	No change; See response to Comment #430 and others previously. This is a consumer protection and resource management issue even though some view it as a business model.
438	248	Court Rich, Rose Law Group		Delete Policy 7.2.3.1	No change
439	249	Court Rich, Rose Law Group		Delete Policy 7.2.5.1	No change



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440	249	Ms. Shilpa Hunter-Patel, Attorney with Fennemore Craig for El Dorado Holdings, Inc.	Although we support the County's interest in assisting ADWR with funding and staff for developing hydrologic work focusing on the groundwater supplies in the County, we encourage the County to clarify with ADWR how any technical information developed by ADWR could be used by potential applicants for assured and adequate supply approvals.	Refers to Objective 7.2.5 and Policy 7.2.5.1 – Suggested (submitted letter) adding some clarification in the policy on this issue in the proposed plan.	No change
441	249	CMX	Currently reads "The Count will..."	Should say "County."	Incorporated change
442	249	Jill Johnson, USA Developers	Policy 7.2.42 does not provide adequate guidance	Specify the regulating agency with which to apply	No change
443	250, 251	Ms. Shilpa Hunter-Patel, Attorney with Fennemore Craig for El Dorado Holdings, Inc.	County should not adopt a policy that changes the timeframe for demonstrating physical availability of water supplies under state law and requires such demonstrations in the County to be made prior to zoning or rezoning. This portion of the plan is most troubling and it has the greatest potential for unforeseen consequences that will negatively impact the timing and progress of development in the County.	Modify Objective 7.2.6 and Policy 7.2.6.1 We strongly urge that this portion of the Plan be revised to address the following concerns outlined in letter submitted.	Modified objective No change to policy
444	250	Court Rich, Rose Law Group	Objective would have damaging unintended consequences	Delete Objective 7.2.6 and accompanying text	Modified text
445	251	Court Rich, Rose Law Group	Policy would have damaging unintended consequences	Delete Policy 7.2.6.1	No change
446	251	CMX	Policy 7.2.6.1: "Explore making policy that will require a demonstration of physically available water supplies prior to approving an application for zoning or rezoning...If allowable under law, the County [BOS] should consider incorporating this requirement into its zoning application process."	ARS 45-576 already requires a certificate of 100-year assured water supply for subdivisions in AMAs prior to plat approval. Growing Smarter Plus legislation states the water resources element does not require additional, independent hydrogeological studies.	No change; this policy addresses the timing of the application and obtaining the certificate. It has nothing to do with technical review of the application/hydrogeology or nor does it require additional studies
447	253	APS	APS agrees with the stated purpose and value of the Energy Element as a means to facilitate more sustainable growth in Pinal County and appreciates the efforts of the County and its Project Team to solicit a broad spectrum of public comment, including that of technical and business representatives, throughout the planning process.	Comment no action required	Comment no change
448	253	Shannon Breslin and Edmond Beck, Tucson Electric Power Company	Tucson Electric Power Company is supportive of developing and adopting utility corridors within Pinal County Comprehensive Plan and, in fact sees this effort as required under the Growing Smarter Initiative requiring local general plans to have an analysis of how utilities will serve future growth.	TEP is planning a 500 kilovolt transmission line through Pinal County and would like to include Pinal County input into the siting process that is held by the ACC. Identification of potential corridors in the Pinal County Comprehensive Plan would be very helpful in this endeavor.	County is anxious to work with TEP. Pinal County Energy Element provides policy direction and does not include a specific graphic showing the corridors.

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449	253	Kazi Haque, Planning Manager City of Maricopa	City is in support and commends the Plan's forwarding looking perspective on this important environmental issue.	Comment no action required	Comment no action
450	254	Tom Wray, Project Manager, SunZia Southwest Transmission Project, Sun Zia Transmission, LLC	We understand staff's proposal in Policy 7.7.3.1 is to post current information on the web regarding these proposed facilities in lieu of showing those locations on the utility corridor map which was included in the prior draft as the Utility Corridors map, Figure 7-2.	Based on this statutory requirement, we encourage the County to include the Utility Corridor map (Figure 7-2) as part of the Plan. In addition, we recommend that the map depict ACC-approved transmission corridors and generation sites, as well as corridors for known plans of generation and transmission developers. Inclusion of the approved and planned projects on a map would assist users of the Plan by providing a more complete picture of the future development landscape within the County.	No change
451	255	APS	The Plan should acknowledge that Pinal County currently does participate in regional planning forums such as the Central Arizona Transmission Study (CATS) Group, which is a subset of the broader Southwest Area Transmission (SWAT) planning group.	The County's continued participation in this and other future related efforts should be encouraged.	Comment no change
452	256	APS	Clarify the term "transitional" energy providers"	Clarify term	Modified text
453	256	El Dorado Holdings and Consultants	First full paragraph, last sentence - How do you know that a conservation level of 11% is an attainable goal?	Please provide substantiation of this claim or delete the sentence.	No change; based on input of energy providers serving on a Task Force during plan development process.
454	257	APS	First full paragraph, reconsider comment that entire households could "get off the grid".	Re-state this as "Advances have now made it possible for entire households or buildings to significantly reduce their traditional energy dependence and at times may be able to generate enough power to "make the meter run backwards"	Change incorporated
455	257	APS	Change the next paragraph from "A solar power plant near Gila Bend will..." to	"A planned solar power plant near Gila Bend will..."	Change incorporated
456	257	APS	The next sentence should change "is" to "will"	Should be "While this plant will be a breakthrough..."	Change incorporated
457	257	APS	For the final sentence it may be appropriate to change it from "The Gila Bend facility will require three square miles of mirrors."	"The planned Gila Bend facility will require up to three square miles of land for its solar fields and power plant."	Change incorporated
458	257	APS	APS appreciates the inclusion and acknowledgement of the Solana Generating Station project and looks forward to future opportunities to work with Pinal County on similar types of projects.	Comment no action required	Comment no change
459	257	Court Rich, Rose Law Group		Delete second sentence of fourth paragraph	Modified sentence



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460	258	APS	The third full paragraph makes reference to statistics from the CATS HV 2016 Transmission Study; however, these may not be accurately stated. The document states that "...electric power generation in Arizona is 30,997 megawatts and electricity currently used in Arizona is 24,819 megawatts." A quick review of that plan suggests that these figures may actually reflect the future modeled conditions in 2016 rather than the current conditions as is currently implied.	Suggest authors review their references for this item and verify accuracy of statistics.	Modified text
461	259	APS	First paragraph, should "additional generation facilities" be... The last sentence of the second paragraph states that "Many of these future transmission corridors have been identified." While the CATS HV studies have and will continue to identify many generation and transmission projects in the area, only a relative few have been reviewed and approved by the Arizona Corporation Commission (ACC).	Change to "additional traditional generation facilities" Text should state that additional generation and transmission projects that have been identified in past, ongoing, and future studies will be subject to review and approval by the ACC.	Incorporated changes
462	261	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.3.1.2 Move toward compliance with green building benchmarks and programs for existing County buildings and facilities and require green building standards be developed in all new facility designs.	We would like to see a measureable timeline added to this policy.	No change; timeline will be part of the implementation process once plan is adopted
463	262	El Dorado Holdings and Consultants	Policy 7.4.1.5 "Require that 20% of all homes in developments larger than 100 dwelling units meet ENERGY STAR or other energy efficiency standards, "Is 20% realistic? Are their other county's that require the 20% and are the homebuyers willing to pay the additional home cost for this?"	Substantiate that the 20% can be met	No change; it is a County goal developed by the Energy Providers Task Force that includes APS, SRP, etc.
464	262	El Dorado Holdings and Consultants	Policy 7.4.2.1 "Encourage developments that use energy smart site design (solar orientation, cluster development)." It is our understanding that P&Z has instructed staff to require 10' side yard setbacks on all residential lots, even in PAD's. Please then define what is meant by cluster development.	Please clarify.	No change made
465	262	El Dorado Holdings and Consultants	Policies 7.4.2.3 and 7.4.2.4 seem to be contradictory. Won't the Activity Centers, because of their higher densities and compactness, create the heat island?	Please address intent, since these 2 policies appear to be in conflict.	No change made



#	Text	Source	Comment	Suggested Action	Comments Addressed
466	263	APS	Policy 7.5.2.2 - This is the first of a few related policies where a recommendation that the County continue to participate in regional energy planning forums such as the CATS Group could be included. Other objectives for which this recommendation would also be applicable as a policy include 7.7.3 and 7.7.4.	Modify additional policies	Incorporated change Added policy
467	263	Tom Wray, Project Manager, SunZia Southwest Transmission Project, Sun Zia Transmission, LLC	Goal 7.6	Add an objective – Support the transmission of renewable energy from sources within and outside of Pinal County.	Added policy
468	264	APS	The prior objective, 7.6.1 suggests the support of small-scale renewable energy, while 7.6.2 suggests supporting the growth of "renewable energy businesses in Pinal County." It may be appropriate to suggest that utility-scale projects such as the Solana Generating Station referenced on page 257 would be appropriate for consideration by the County in this Plan.	Suggest that utility-scale projects are appropriate for consideration by the County in this Plan.	Modified text
469	264	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.6.1.2 Assess current codes so they are supportive in permitting small scale renewable energy projects. Explore ways to reduce barriers caused by homeowner's association restrictions.	We support this policy but would like to see more emphasis placed on eliminating the beaurcratic/red tape barriers placed on home owners or businesses when looking to incorporate wind or solar enegy systems on their homes or facilities.	Comment no change
470	264	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.6.1.4 Support state and federal incentive programs for the development of renewable energy infrastructure for individuals and businesses.	This policy may be vital in the short term to ensuring that Pinal County has the smallest energy footprint, per capita in the state.	Comment no change
471	265	Tom Wray, Project Manager, SunZia Southwest Transmission Project, Sun Zia Transmission, LLC	Objective 7.7.1	Revise the objective to read: Identify and protect potential sites and corridors for new energy generation and transmission facilities.	Incorporated change
472	265	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.7 Goal: Support the provision of adequate energy for the future while protecting the natural environment and resources.	We would like to see this goal modified to include the encouragement of clean energy production and the prohibition of coal power plants.	This Plan or any Comprehensive Plan can never be all things to all people. We hope that we can continue to work with you and the development community on the implementation of these policies if they are approved.
473	265	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.7.1.2 Work with energy providers to co-locate where possible facilities such as transmission lines, pipelines, substations, and terminals.	Please add provisions for eliminating wildlife cooridors, sensitive natural environments and ecologically valuable areas from the list of possible locations of tranmission lines, pipelines, substations or terminals.	We believe that this issue is covered in Policy 7.7.2.4.



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474	265	Sierra Club Grand Canyon Chapter - Palo Verde & Rincon Groups	7.7.2.2 Support innovative designs for new generating facilities that minimize water use. 7.7.2.3 Explore innovative water re-use strategies.	Imperative that these policies be emphasized in the final plan.	Comment no change; We hope that we can continue to work with you and the development community on the implementation of these policies if they are approved.
475	265	APS	Policy 7.7.1.3 - APS appreciates the recommendation of identifying and protecting the designation of transmission corridors described in this section. The Plan should also encourage the adoption of designated generation and transmission and facility sites and corridors in future updates to county and municipal planning documents. This has been an area of emphasis for the ACC in utility facility siting cases and would be a good opportunity to support sound planning and public notice on a regional level.	Include language encouraging the adoption of designated generation and transmission and facility sites and corridors in future updates to county and municipal planning documents.	Incorporated change
476	265	El Dorado Holdings and Consultants	Policy 7.7.1.3 "Protect existing and projected transmission corridors from incompatible development ..." Who defines "incompatible development"? Need to define "projected". Does "projected" mean an approved sited corridor as approved by the ACC or a potential route that is not yet approved? Please explain how this policy will effect existing PAD's.	Please provide clarification and definitions.	No changes Deleted "projected" Comment regarding PADs – See Introduction regarding existing approved zoning
477	265	Court Rich, Rose Law Group		Add "and projected" to Policy 7.7.1.3	See Comment #475
478	266	APS	It was noted during the last Technical Advisory Group meeting that a supplemental document including the graphic illustration of facility and corridor locations would be developed in addition to the Comprehensive Plan.	Encourage the development of the supplemental document as part of the Plan and that these locations be included in those materials.	Comment noted no change
479	266	Tom Wray, Project Manager, SunZia Southwest Transmission Project, Sun Zia Transmission, LLC	Policy 7.7.3.2	This policy should probably refer to "prospective" residents. Change word.	Incorporated change
480	266	Tom Wray, Project Manager, SunZia Southwest Transmission Project, Sun Zia Transmission, LLC	Policy 7.7.3.2	When the County evaluates a more specific site for a planned airport within the designated Aviation Based Commerce Center, it should take into account the SunZia Project so that the airport and runways are situated in a way that will not conflict with the planned SunZia transmission line corridor.	Comment no change



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481	267-290	El Dorado Holdings and Consultants	Healthy, Happy Residents - This chapter is called "Healthy, Happy Residents", yet the subjects covered in the chapter are Housing and Cost of Development. The Healthy, Happy Residents is one of the components of the Pinal Vision. Please refer to page 26 where the goal of Healthy, Happy Residents is articulated. This goal or vision is far more than housing and cost of development. Perhaps the chapter title should be called something else so as not to imply that housing and cost of development make up the whole of the Healthy, Happy Residents component.	Suggest calling this Chapter "Housing and Cost of Development", rather than Healthy Happy Residents.	No change; All chapters follow the Pinal County Vision
482	267	El Dorado Holdings and Consultants	First sentence, "The linkage between a sustainable economy and housing availability is essential." The word "Linkage" is used in several other sections of the Comp Plan in a different context than here.	Suggest changing the word "linkage" to "relationship or connection".	Modified sentence
483	267	El Dorado Holdings and Consultants	Second paragraph - This paragraph focuses on the need for "affordable" housing. However, there are a number of objectives and policies that are proposed in this Comp Plan that, if adopted, will force housing prices up. Hence there are competing, non-compatible goals within the various components of the Pinal Vision. Where is the priority?	Additional investigation and quantitative analysis should be preformed to try and determine a range of additional housing costs that will be brought about with the adoption of this Comp Plan. The analysis should identify the goals / policies in the Comp Plan that contribute to the added cost. The BOS should be aware of the magnitude of the additional costs before adopting the Comp Plan.	Modified paragraph
484	267	Kazi Haque, Planning Manager City of Maricopa	Housing Element and Energy Element goals and objectives should overlap to be consistent and for applicability. Otherwise the housing and sustainable developments will fall short in implementation of the environmental safeguards.	Check for consistency and linkages	Reviewed for consistency
485	267	Court Rich, Rose Law Group		Delete text in second sentence of second paragraph	Modified text
486	268	Court Rich, Rose Law Group		Suggest adding language that accurately reflects the median price of today's Pinal County home as it is much different than the 2006 number used at the bottom of the page.	Housing Needs Assessment is the latest research completed by Pinal County
487	268	CMX	The bulleted list of facts pertaining to housing and homeownership is not tied into rest of chapter effectively.	An assessment of this data needs to be clearly and coherently translated into policies addressing housing stock diversity and affordability.	All dot points deleted
488	269	El Dorado Holdings and Consultants	"The Pinal County Comp Plan Housing element is intended to provide" This sentence does not make sense as written.	Suggest changing the word "of" after the word provision to "that".	Modified sentence
489	269-270	El Dorado Holdings and Consultants	Reference is made to the Housing Needs Assessment that was completed by the Pinal County Housing Dept. and that the Comp Plan compliments the Housing Needs Assessment. Has the Housing Needs Assessment been approved. Please provide copy of Housing Needs Assessment. Not sure that the goal of affordability is compatible with other goals and policies of the Comp Plan.	Needs additional research.	Some text modified



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490	270	CMX	"Conversely, when businesses are...executive level housing."	This is a strangely-worded statement and suggests stratification of neighborhoods based on income. It would be better to simply say "a range of housing types, styles, and prices."	No change
491	270	CMX	Last paragraph: "Ensuring that neighborhoods are well-designed and safe directly impacts the housing market."	The Plan should address how this impacts the market and what constitutes "well-designed."	No change
492	271	El Dorado Holdings and Consultants	Moderate Low Density Residential (1 - 3.5 du/ac) The prior draft identified this category as 1 - 4.0 un/ac. Why did this change? Affordable housing cannot be achieved if the density is kept low. The same applies to the Medium and High Density categories.	Use the 1 to 4 un/ac range.	Direction from Pinal County Planning & Zoning Commission
493	271	El Dorado Holdings and Consultants	Need to review assumptions that were used in calculating a buildout population of 6.1M. Are the assumptions consistent with the density ranges that will be allowed?	Please provide backup assumptions and calculations on the full buildout population of 6.1M and show how the proposed density ranges support the 6.1M population.	Deleted text
494	271-272	El Dorado Holdings and Consultants	Moderate Low Density Residential (1 - 3.5 du/ac) The prior draft identified this category as 1 - 4.0 un/ac. Why did this change? Affordable housing cannot be achieved if the density is kept low. The same applies to the Medium and High Density categories.	Use the 1 to 4 un/ac range.	Deleted text
495	271	Court Rich, Rose Law Group		Change residential densities	No change
496	272	CMX	"These changing trends, coupled with...increasing fuel costs..." and later: "Many housing industry experts are predicting that smaller homes on smaller lots closer to amenities and employment will be desired...some experts assert that there is enough single family, large lot inventory already in place to satisfy all future demand for this type of product."	Further address rising transportation costs vs. housing costs through policies encouraging responsible development. There seems to be a disconnect between the Plan text and the land use map: the map depicts predominately lower density, single family housing away from amenities and transit connections.	Deleted text
497	272	CMX	"Higher transportation and energy costs will also impact how future housing is designed."	This Plan identifies challenges for Pinal County. Suggest creating policies that directly and explicitly encourage compact, mixed-use development, multi-modal accessibility, etc.	Deleted text
498	272	Court Rich, Rose Law Group	Text is too editorial and out of place	Delete text in paragraphs three and four	Deleted text
499	274	El Dorado Holdings and Consultants	Policy 8.1.1.2 "Develop and maintain an inventory of existing housing product (by type, size, and value) and monitor new developments to maintain balance. Who determines / defines the balance when the balance is forever changing as the market changes? If the County wants to develop and maintain an inventory of the existing housing product, we are fine with that. We do not support the County trying to control new developments with this information. It is clearly not the County's role.	Delete the words "monitor new developments to maintain balance".	Incorporated change



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500	274	El Dorado Holdings and Consultants	Policy 8.1.1.3 "Support changes to state law to give counties and municipalities greater authority over lot splits." Need to understand the reasoning behind this policy. What is wrong with the current State law?	Need to understand intent.	County and municipal state law differs and should be consistent.
501	274	El Dorado Holdings and Consultants	Policy 8.1.2.4 Under what residential category of the seven listed on page 271 would these types of housing be allowed?	Please clarify.	It depends on product design; this provides flexibility
502	274	El Dorado Holdings and Consultants	Policy 8.1.1.1 "Identify appropriate areas for a range of housing in conjunction with the development of Activity Centers." What does this mean?	Please clarify intent.	Intent of Activity Centers is to allow for live, work, play environment
503	275	CMX	Objective 8.1.3: What is the "appropriate" location for compact residential development?	Further describe. This Plan does not depict compact residential development.	No change; plan encourages a variety of housing ranges and compact/cluster development as a way to preserve open space
504	276	CMX	Objective 8.2.2	Add a policy encouraging/incentivising green building.	Policies are included in Environment and Energy Elements
505	276	El Dorado Holdings and Consultants	Policy 8.2.1.2 "Encourage affordable housing to be integrated into existing development and neighborhoods to avoid economic segregation."	Please explain how this would be accomplished.	There are example projects around the country that illustrate how this policy can be implemented
506	279	El Dorado Holdings and Consultants	Cost of Development - Cost of Public Services Second paragraph, first sentence, "For example: Does it cost more or the same to..." Is the County intending to deny property owners zoning on their property if it is not within a certain distance from a municipality or existing subdivision? Is that legal?	Please clarify intent.	Represents a question that should be asked – proximity to existing services
507	279	Court Rich, Rose Law Group		Delete "public" from item 2	No change; it reflects ARS
508	282	Court Rich, Rose Law Group		Change "would" to "may" and delete "much" from second to last sentence, second paragraph	Change made
509	282	El Dorado Holdings and Consultants	Define governmental complex.	Provide definition.	Offices and facilities where the County conducts business
510	283	Court Rich, Rose Law Group		Text edit to last sentence, third paragraph	Change made
511	285	CMX	Table 8-1: Funding Options.	Specifically explore creation of public-private partnerships. Other options include Growing Smarter Grants, U.S. Department of Commerce Partnership Planning Program Grants, Research and Natl Technical Assistance Program, Rural Capacity Development Initiative Grants, CDBG, and the Main Street Program. Provide policies which reflect these funding options.	Comment noted; no change



#	Text	Source	Comment	Suggested Action	Comments Addressed
512	287	El Dorado Holdings and Consultants	Goal 8.3 Promote a philosophy that new growth pays for its share of financial impacts in an equitable manner. The State Statutes require new development to pay for its fair share of costs and those costs must result in a beneficial use to the development. Obviously, the County believes the State Statute is inadequate and that developments are not paying their share of costs.	The County can only require what is allowed under the Statute.	No change
513	289	Court Rich, Rose Law Group	Add policy that asks for the county to consider the economic benefit to the county of a given proposed subdivision in trying to evaluate its overall economic impact. It appears the current plan only looks at the potential economic costs of the development for provision of services but in order to get a good picture of what is being proposed the county should look at the positive economic impact that a given development will have on the county.	Add new policy 8.4.1.11	Change made; Added new policy
514	290	Court Rich, Rose Law Group		Add "to the County" to Policy 8.4.1.11	Change made; Added to policy
515	293	El Dorado Holdings and Consultants	Education - Policy 9.1.1.1 "Assist school districts in obtaining useable sites for new schools in advance of needs." Most of the time the school districts do not want the school sites before the need, i.e. a Land Donation Agreement is executed by the school district and developer at time of preliminary or final plat, but the property is not deeded until the School Facility Board has approved the funding for construction. Hence providing school sites in advance of need rarely happens.	Please clarify intent.	Modified policy
516	293	El Dorado Holdings and Consultants	Policy 9.1.1.2 "Consider current and projected school enrollment and available school capacities when approving the type, scale, and timing of residential development." This policy implies that residential developments may be denied approval based on school enrollment or capacity. We question whether this is legal. This concern is covered under the State Statute by the School Facilities Board and the various School Districts. What is the County's intent?	This item should be deleted.	Modified policy
517	293	Court Rich, Rose Law Group	Add language that recognizes that the county will not be able to pinpoint exact locations for higher education uses and that any such locations are suggestions rather than mandated uses.	Delete "and Activity Centers" and add "potential" to Policy 9.1.1.7	Change incorporated
518	296	Court Rich, Rose Law Group		Delete "initially" from first sentence under Adoption	No change
519	296	CMX		Suggest providing adoption process in bullet point format for easier legibility.	Incorporated change



#	Text	Source	Comment	Suggested Action	Comments Addressed
520	298	El Dorado Holdings and Consultants	An amendment to the Comp Plan is necessary when a project does not conform to the Plan. Please provide text that addresses that existing PAD's are grandfathered.	Add language that identifies that adopted PADs have grandfathered status.	Added new text to Introduction
521	298-302	Court Rich, Rose Law Group	See letter 12/22/08 for detailed explanations of changes	Text changes and deletions on Monitoring the Plan and Plan Amendments	Modified some text
522	299	El Dorado Holdings and Consultants	First bullet point, "any proposed project of 160 acres or more that does not meet ... the applicable Public ... Responsibilities of the Plan." How does a proposed project demonstrate that it meets the Public Responsibilities when that Public Responsibility has not yet been adopted by the Board of Supervisors or been implemented by the County, such as Policies 3.5.1.6, 7.2.1.1., 7.2.2.1, 7.2.2.2, 8.3.1.1, 8.3.1.2, 8.3.1.3, and so forth?	Please provide better clarification in the Major Amendment criteria bullet points.	Modified text
523	299	El Dorado Holdings and Consultants	Second bullet point, "Any change is a residential land use classification to a non-residential land use classification of 160 or more contiguous acres." If a mid or high intensity Activity Center location moves to a different intersection location because the location shown on the Land Use Plan is where existing residential PADs are located, does this require that a new location for the Activity Center would need a Major Amendment?	Need further clarification and dialogue on this.	Modified text
524	299	El Dorado Holdings and Consultants	Fourth bullet point, "Any deletion of a planned freeway, parkway or principal arterial or ... any two-step ...or a change to the currently portrayed corridor." requires a Major Amendment. If an existing PAD has grandfathered rights and is currently not required by stipulation to provide a Freeway, Parkway, Principal Arterial, etc. or the alignment of the major roadway conflicts with an existing preliminary plat or final plat or permitted wastewater treatment plant, as examples, wouldn't the location of the Parkway have to change? Further, there has been no environmental impact analysis or other conflicts analysis done on any of the alignments. What if such analysis required that the alignment be moved? Is it truly the intent that the County wants this to be a Major Amendment?	We were told in discussions with staff regarding the adoption of the RSRSM that the locations of the parkways were not set in concrete and that their alignment could be adjusted, especially if conflicts were encountered. The note on the RSRSM Preservation Corridor Map indicates that the Map depicts 'general' corridor locations. The alignment issue should be treated consistently in the RSRSM Plan and the Comp Plan. Please consider revising these criteria.	No change



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525	299	El Dorado Holdings and Consultants	Fifth bullet point, "Comp Plan text changes that conflict with or alter the Plan's goals and policies." There are numerous Public policies that have not been adopted yet by the BOS and some of the proposed Public policies will require unanimous approval of the BOS. How then does this criteria work if the BOS does not adopt a policy that is proposed in the Comp Plan? Certainly, a proposed Public policy that is not adopted by the BOS could not be enforced under the Com Plan.	This text of this bullet point needs to be clarified and revised to address all of the proposed Public policies that are in the Comp Plan that may not be adopted in the future.	Once the plan is adopted all policies in the Plan are adopted.
526	299	El Dorado Holdings and Consultants	Sixth bullet category under Major Amendment standards refers to "additional criteria within the Moderate Low Residential category".	Are these the bullet points listed on pages 55 and 56? If so, it would be helpful to make this clearer.	Pages 55, 56, 57, 58, 59, 60, & 61. Added reference in the chapter
527	300	CMX	Checkmark beginning, "Land uses that meet the Vision..." It is not feasible for development to adhere to the requirement for proposals to correspond to Plan maps or else a non-major (minor) amendment will be required, given the relative lack of detail provided by the Plan graphics. This requirement is a deterrent to development, which in turn contradicts Plan goals, objectives, and policies regarding diversifying and expanding opportunities.	While it is understood the Plan graphics are not zoning maps and should not necessarily address land use on a parcel-by-parcel basis, a higher level of detail is needed to show commercial/employment land uses. Zoom in on targeted growth areas and areas of existing development.	Comment noted; no change
528	300	Ryan Desmond, Vestar	Recommend deleting item or revising 3 (d)	Recommend deleting item or revising 3 (d) to read – Placing new development away from existing and approved development if the new development overtaxes infrastructure systems and public services when considering: future contributions to infrastructure and services through construction and dedication of improvements; payment of development fees; and other mitigation measures to be implemented later in the development process.	Incorporated change
529	300	Ryan Desmond, Vestar	Recommend deleting item or add language	Recommend deleting item or add language as follows – increasing traffic without general strategies for mitigation to be implemented later in the development process.	No change
530	300	El Dorado Holdings and Consultants	Amendment approval criteria item 3.a. who defines what is significantly altering "acceptable existing" is or is not? Are land uses in existing PAD's acceptable?	Need definition of "acceptable existing"	Removed "acceptable"
531	300	El Dorado Holdings and Consultants	Amendment approval criteria item 3.b. significantly reducing the jobs per capita balance - we believe the ratio is too high at 500/1000 and should be reduced to the sustainable rule of thumb see comments on page 94 and 121 above.	More time needs to be spent on the jobs to population ratio to make sure the ratio is truly achievable.	Comment notes; targets have been set through significant research and discussion
532	300	El Dorado Holdings and Consultants	Amendment approval criteria item 3.c. replacing employment with residential uses. If jobs to population ratio is set too high there will be no way to avoid allowing residential uses.	See related comments on jobs to population ratio.	See comment above



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533	300	El Dorado Holdings and Consultants	Amendment approval criteria item 3.d. Placing new development away from existing or approved development.... Does approved development include existing zoned PAD's? Would this criteria exclude projects like the Anthem project in Maricopa County?	Need to understand intent.	See changes made
534	300	El Dorado Holdings and Consultants	Amendment approval criteria item 3.f. affecting the existing character of the immediate area. Please explain how a proposed project would not effect the adjacent area? How can this subjective requirement ever be met?	Need to understand intent.	Modified 3f
535	301	CMX	Collaboration	To effectively manage growth, a high level of coordination is required between the County and individual cities and towns. This should go beyond annual discussion of the state of the region.	Deleted "annually"
536	301-302	El Dorado Holdings and Consultants	Language under Collaboration - Text seems to contradict. Please explain how existing PAD's will be handled.	Need to understand how existing PAD's would comply with this section.	See new paragraphs in Introduction
537	301-302	Ryan Desmond, Vestar	Last sentence of 301 and all of 302	Last sentence of 301 and all of 302 – suggest two possible revisions – Revision1 – Rezoning and subdivisions should be compatible with the intended future land use pattern shown in the Plan and be generally consistent with the vision, goals, objectives, policies and guidelines. Then delete all 4 items that follow and leave last paragraph as is. Revision 2 - Rezoning and subdivisions should be compatible with the intended future land use pattern shown in the Plan and be generally consistent with the vision, goals, objectives, policies and guidelines which will allow the proposed land use to be developed: 1. Add – “negative” after first word; Add to end of sentence “when considering: future contributions to infrastructure, public facilities and services through construction and dedication of improvements; payment of development fees; and other mitigation measures which will be implemented later in the development process. Leave the rest of the numbered points and last paragraph the same.	Incorporated changes
538	Appendix A	James Poulos, Robson Communities and its affiliates	The Checklist is too long and some of the questions (because of the way that they are worded) cannot be answered. The concern is that any such unanswered questions may be used to obstruct the approval process.	Shorten Checklist questions	No change
539	A-1	CMX	First sentence under Determination heading: "...conformity with Plan County's..."	This should read either "Pinal County's..." or "the Comprehensive Plan's land use designations..."	Incorporated change
540	A-1	CMX		It should be implicit that both textual and graphical elements of the Plan should be utilized.	Modified text in the document to clarify

Pinal County Comprehensive Plan
 Second 60 Day Review Draft (October 2008)
 Comment Matrix



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541	A-2	CMX	First checkmark	Suggest rewriting to read, "Developers should use this checklist as a guide to the Plan's policies in the early stages of a development proposal and when submitting..."	Incorporated changes
542	A-3	CMX		Instead of repeating the County Vision and vision elements verbatim from the introduction, suggest restructuring to make the form more instructive. For instance, this checklist should quantify how a sense of community is measured or what constitutes effective mobility and connectivity.	No change made; it is meant to be a tool that could be used independently of the entire Plan
543	A-9	CMX	Second sentence under System of Connected Trails... heading.	Remove extra line break.	Noted
544	A1-A10	El Dorado Holdings and Consultants	Compliance Checklist - demonstrating compliance with Comp Plan is still ambiguous and confusing and should be understandable and predictable.	Provide examples of existing projects (PAD or other) and illustrate how those projects would complete the checklist and demonstrate compliance with Comp Plan.	County may consider as part of implementation to provide assistance