Summary of Comments on the 2013 draft of the Prescott General Plan
Provided by Lindsay Bell at the
April 10, 2014 Public Hearing convened by
Prescott Planning and Zoning Commission

Ms. Bell began her remarks by providing her background as a former City Council Member and a participant in various City planning processes. In particular, she pointed to her experience as a member of both the 1997 and 2003 General Plan Committees where she authored major sections of those documents and functioned as the final editor for both plans. Noting that the City Council had directed the current planning committee to update (rather than re-write) the 2003 Plan, Ms. Bell indicated that she had compared the current draft general plan page by page to the 2003 Plan.

Conclusions and comments:

The first four chapters of the draft retain the same format:

- Introduction and Vision
- History and physical Environment
- Existing Conditions
- Future challenges

These chapters, especially the last two, set the stage for the goals and strategies listed within each element.

The first three chapters are mostly the same as the 2003 plan with some updates on statistics and minor adjustments to language. A notable exception is the reference to a strategic plan in **1.3 Implementation Process.** The 2003 General Plan called for a Strategic Plan to be written (similar to the 1994 Community Strategic Plan) following the adoption of the General Plan. The idea was that a strategic plan would guide priorities in implementing the various goals and strategies of the GP. In the 2013 draft, it states that a "strategic plan is implemented through the City Council annual budget process." An annual budget is a one year operational plan. It is <u>not</u> the equivalent of a strategic plan.

Recommended changes in language:
Delete:
~~A strategic plan is implemented through the City Council annual budget process.~~
Add:
The General Plan provides the long range vision for the community with goals and strategies for carefully managing growth. The implementation of the goals and strategies contained in this plan are to be accomplished through the development of a Strategic Plan for the City and through the creation of Specific Area Plans for geographic areas in need of specific planning consideration.

The General Plan and a Strategic Plan (to be produced following adoption of the General Plan) influence and are implemented through the City Council Annual budget process.
Retain:
The goals and strategies assist the City Council in prioritizing budget and capital fund allocations and in measuring the direction of development trends in the community.

The vision, community values and guiding principles are virtually unchanged from the 2003 plan.

Revised 6-24-14

Chapter four was previously called future challenges and now is called "General Plan Summary" which totally changes the intent of that chapter. However, it still reads mostly as an environmental scan which lays out the challenges the City will face over next few years. There are a few important additions such as the concept of "complete streets" and dark sky issues.

Recommended changes in language:
Change 4.0 GENERAL PLAN SUMMARY to 4.0 FUTURE CHALLENGES

Section 4.1:
Delete:
~~To serve those in need, local churches and non-profits collaborate through various programs as limited finances allow.~~

Section 4.2
Add:
Continuing trends in land use indicate that residential development comprises an increasing proportion of City development while commercial and industrial development accounts for (insert percentage).

Section 4.3
Delete end portion of this sentence and add additional language as follows:
However, marginal income households are still not able to buy into the housing market, ~~possibly due to a tightened credit and financing market~~, and also have difficulty obtaining rental housing that costs less than 30% of household income.

Suggest moving the paragraph beginning "A variety of land uses exist within the City of Prescott..." to section 3.3.3

Section 4.4
Suggest moving the second paragraph ("Development in the outlying areas.....describe the character of Prescott") to section 3.3.4.

Section 4.5
Recommend moving paragraphs 1 ("Transportation planning within the City...")and 5 ("Prescott residents and visitors currently....") to section 3.2.2. Recommend moving paragraph 4 (Future development and implementation...") to section 3.2.2. End the two remaining paragraphs in this section with the following sentence: The Circulation Element provide further detail on these subjects.

Section 4.6
Suggest moving first paragraph ("The term Open space is used..."), first sentence of paragraph 2 (The acquisition, dedication and stewardship of open space as a community amenity is also an economic development asset which supports the tourism industry.) and paragraphs 4 (Dust, smoke,....), 5 (Storm water run-off...)) and 6 (Prescott's clear dark night sky...)to section 3.3.8 Environmental Commitments. End section with this sentence: The Open Space and Environmental Planning elements discuss these issues in greater detail.

Section 4.7
This section could remain as written, or the first two paragraphs could be moved to a new section on historic preservation that might be placed in the section 3.3 of the previous chapter.

Section 4.8
No changes suggested

Section 4.9
Suggest moving paragraphs 4 and 5 to section 3.4.2. Recommend re-ordering remaining language and adding new language as follows:

Demands for services grow along with population growth. Services must be provided within a reasonable revenue structure, which includes effective management of expenditures. It is a challenge to maintain current service levels and make strategic enhancements for desired future services. The cost of maintaining an aging infrastructure and funding needed improvements remains an ongoing challenge.

Few of the community's goals can be achieved without a strong economic base. For the City of Prescott and other Arizona municipalities, this means recognizing sales tax as the primary source of revenue and maintaining a strong, growing sales tax base within a highly competitive regional market. In order to achieve and maintain a strong economic base, it is necessary that Prescott:

- Attract and retain and encourage expansion of a reasonable share of the regional scale retail business market
- Attract, retain and encourage expansion of local or "neighborhood scale" business development sufficient to provide local goods and services within Prescott for City residents.
- Continue to promote a strong tourism industry
- Improve the quality of the regional job and employment market with an emphasis on higher wage positions such as provided by research and development and telecommunications.
- Provide housing opportunities for all segments of the community including moderate to low income residents.
- Promote healthy education and cultural sectors as community assets which enhance quality of life as well as contribute to the viability of the economic base

Prescott's economy includes retail sales, tourism, education, health care, real estate, industry, construction, federal state, county and municipal government. The historic downtown, airport, industrial parks, auto dealerships and regional commercial developments along the Highway 69 Corridor are recognized as economic centers for the City. Maintaining the vitality of the City's economic centers, and achieving a healthly balance between sectors of the economy while not becoming overly reliant on any one sector (e.g. construction or tourism) is a constant challenge. The Economic Development Element further addresses these issues.

The very last challenge listed, cooperation on regional issues is totally different. Instead of noting the very real and significant challenges of maintaining regional cooperation on issues such as water, retail development (and competition), transportation and the like, this section instead lists numerous examples of regional cooperation. While it may be important to note the various areas of cooperation somewhere in the document (maybe move these examples to current conditions and trends?), it is not appropriate for a section on challenges.

Section 4.10

Suggest retaining the first paragraph only and changing the language of one sentence as follows: Challenges which argue for.....and acknowledgement of the economic ~~cooperation~~ competition between Yavapai County, Prescott, Prescott Valley, Chino Valley and the Yavapai-Prescott Indian Tribe.

Suggest moving the remaining paragraphs to a newly created section on Regional Cooperation in Chapter 3. Alternatively, these paragraphs could be moved to relevant existing sections within chapter three. For example, paragraph 5 which discusses regional coordination on water would logically fit into Section 3.3.7.

Land Use Element

This element is notable for what was taken out from the last plan instead of significant additions, although the concept of 'form based" codes was added.

The section which discusses development planning processes is much the same as the previous plan which outlines the various types of planning processes undertaken by the City: Specific Area Plans, Neighborhood plans, and specialized plans. Unfortunately this does not accurately reflect how the City actually does planning. The various specific area plans mentioned (PEAP, Willow Lake South, etc.) were all completed prior to 2003 (prior to last general plan). In the last ten years, only one Specific Area Plan has been updated (Airport) and two specialized plans (Open Space and Parks and Rec Master Plan) have been updated. No new ones have been written. Likewise, the last neighborhood plan done was completed 12 years ago (Dexter neighborhood). When that neighborhood initiated an update on their own, City planners didn't know what to do with it.

Many of these planning processes were initiated when new areas come under development pressures and that raised concerns among existing residents and neighborhoods. These planning processes were a way to work out the conflicts as development moved forward. Whatever planning process the community is using now should be reflected in the General Plan.

In light of several possible large annexations (mostly in the airport area) that were being discussed in the early 2000's, the 2003 plan land use element suggested the need to undertake a review of city annexation policies. Since 2003, some of those anticipated annexations have proceeded, and the current Plan draft acknowledges this. However, some of those annexations and the subsequent re-zonings and development agreements actually conflict with the existing policy on annexation which has as a main objective to annex "property with actual or potential commercial or industrial uses". I suggest that a review of annexation policy is still needed since there are several examples of annexations and development which is inconsistent with the established, adopted policy. The current plan also declares that " large annexations may be unlikely in the coming years due to economic constraints and the availability of large undeveloped areas already within the City". I'm not sure that this is accurate, and at the very least, there is little data offered within the Plan narrative to support this conclusion.

The housing section of this element, a major component of the 2003 plan, gives short shrift to the affordability gap that exists within the community. That affordability gap is the basis for many of the strategies to achieve a balance of housing types—and in particular workforce housing. There is however, an expanded discussion on market forces which affect housing, and a conclusion that "smaller houses on smaller lots should occupy a greater share of the market in the next decade". The narrative

does not support that conclusion. The narrative also discusses the impact on property values of home buying as an investment strategy as well as the rise of foreclosures during the recession. While these forces clearly affected the housing market (and the construction industry) across the State, particularly in the urban counties of Maricopa and Pima, I'm not sure that they were as significant an influence in the Prescott housing market, and the narrative fails to adequately support this conclusion. I would suggest some more research be done on trends in property values and owner occupied housing in Prescott during the last decade. The General Plan should reflect the true housing picture in Prescott. The goals and strategies to address the housing needs of working families (in order to achieve the community goal of a balanced community) are very different from strategies that might be suggested to make properties more attractive to investment buyers.

Suggest inserting one or more tables into section 5.5.2 (Housing Stock and the Economy) or section 5.2.5 (Balanced Housing Opportunities) that list Prescott family income by ranges ; indicates the housing affordability line for families at that level of income (i.e. home price that is affordable for them); and also notes the estimated number of housing units available in the community at each of those levels. We have a significant housing affordability problem in Prescott for middle and low income households seeking to rent or buy in our market. It should be noted that poverty rates are on the rise in Prescott.

Suggest these changes on page 36:

The housing market has ~~corrected itself~~ stabilized somewhat in recent years, which will assist some moderate and low income households in buying or renting into the Prescott housing market. However, some marginal income households are still not able to buy or rent in the local housing market due to ~~strict financial and loan requirements~~ insufficient household income.

Yavapai County is the only county in Arizona that has no local housing authority to facilitate the flow of federal housing assistance funds. The Arizona Department of Housing (ADOH) provides this function for the region. However, ADOH has been in shortfall due to budget cuts forcing Section 8 (the largest housing assistance program) to be frozen in Yavapai County, and caused HUD-VASH vouchers initially reserved for Yavapai County to be transferred to Mohave County. Yavapai has a need for a local public housing authority due to region specific issues: high number of Veterans (Prescott Domiciliary), low number of shelters (specifically single male shelters) high number of private treatment facilities, lack of public transportation, lack of employment opportunities, higher rents that urban areas. Establishment of a housing authority would allow more federal financing for development of affordable housing for both rental and purchase.

Rewrite Strategy 2.4 as follows:

Strategy 2.4 To stimulate production of more moderately priced housing, reserve 20% of the remaining water allocation budget for new homes or developments which include a significant number of units affordable to people at or below median income. This water allocation decision will be contingent on the affordable units being developed during the first phases of the project.

Add Strategy 2.7: Support and participate in the creation of a county wide Public Housing Authority.

Goals have also been removed which were related to view shed protection, open space and sensitivity to natural features. Since citizens still care about these things (witness the recent comments over a proposed senior housing complex behind Walmart on Highway 69), I suggest these goals be brought forward from the 2003 plan (goal 2 from 2003 plan).

Suggested language:

Goal 5: Manage and guide future development in neighborhoods in a manner sensitive to topography, ridgeline or view shed protection, protection of open space and other natural features.

Strategy 5.1 Promote preservation of steep slopes by clustering residential development on flatter terrain.

Strategy 5.2 Restore vegetation where cut and fill sites occur to minimize scarring and control erosion to protect the site and adjoining properties.

Strategy 5.3 Implement development code provisions to reduce the visual impacts of ridgeline development and construction related scarring on hillsides.

Strategy 5.4 Promote establishment or preservation of open space within neighborhoods through subdivision designs that allow incorporation of open spaces within neighborhoods.

Strategy 5.5 Encourage developers to use the Planned Area Development design option to preserve natural features and provide buffers and open spaces in new subdivisions.

Strategy 5.6 Use negotiation opportunities and applicable regulations to preserve or create neighborhood open space, trails and parks.

Under Transition and Special Study areas, suggest adding the following strategy:

Strategy 2.2 Assure appropriate buffering and screening between dissimilar uses, particularly between residential and commercial uses.

There is no longer a goal to update the Downtown Master Action Plan. The current Downtown Master Plan is 17 years old. I suggest that it is time to update it. Also, several strategies to increase pedestrian access and maximize bicycle, pedestrian and transit circulation in downtown have been watered down and/or removed. Various studies and reviews of Prescott's downtown have consistently emphasized that the human scale and pedestrian aspects of the Courthouse Plaza and surrounding areas are essential to the character of the downtown (and indeed the entire community). I suggest that these be emphasized rather than pared down.

Suggest restoring strategy 2.2 which was struck from the earlier drafts:

Strategy2.2 Create and maintain a system of pedestrian ways radiating from the Courthouse Plaza and linking significant cultural assets and arts venues.

Add to Strategy 3.3 as follows:

Review and update the Downtown Specific Area Action Plan, the Prescott Historic Preservation Master Plan and the Courthouse Plaza Historic District ordinance regularly to maintain their usefulness and relevance.

Include goals 5 from the 2003 General Plan which addresses bike, ped and public transit in downtown:

Goal 5. Maximize bicycle, pedestrian and public transit circulation in the downtown.

Strategy 5.1 Adopt and implement a Bicycle and Pedestrian Mater Plan including an element addressing downtown.

Strategy 5.2 Expand the public education efforts of the city to highlight the availability and coverage of the existing circulation and public transportation options.

Strategy 5.3 Promote new or expanded circulation options and facilities through the media, including city newsletters, newspapers, televiision and radio.

The section on business commercial and industrial uses doesn't sufficiently address the question of land suitable for industrial development and how annexation plays into that. (It should be noted that the Economic Development Element touches on this somewhat.) This section also doesn't adequately address conflicts with residential uses near the airport—things such as noise abatement.

Two other significant issues/changes have surfaced in the community, and were not included in the land use section. One is the fact that Prescott is now a CDBG entitlement community with access to yearly CDBG grants. With that designation comes the responsibility to prepare and periodically update a community CDBG plan with a citizen advisory committee. I suggest that this be included in the land use section.

The second issue that has been discussed extensively in the last couple of years is the growing number of recovery homes in Prescott, and the various impacts those homes have on residential neighborhoods. This should definitely be addressed in the Land Use element.

Growth Management/ Cost of Development

The current draft really waters down (pun intended) the references to water and how water availability plays into growth management. The water allocation decision is the ultimate growth management tool. The 2003 Plan and an earlier draft of this plan pointed to the City's policy of setting aside a portion of the water budget specifically for workforce housing. That has been deleted from this section. I suggest that it be included.

The draft also took out (from the 2003 Plan), most references to open space and also the Village Center concept. There has been some discussion in recent years that the Village Center idea may not be wanted/needed in Prescott, but it is still relevant to mixed uses and compact forms which are discussed and endorsed in this element. I suggest that the committee undertake a discussion with P & Z as to whether or not the Village Center concept still makes sense for the community. The General Plan should reflect the outcome of that discussion.

The 2003 General Plan specifically listed various areas of the community that were coming under development pressures, but the 2013 draft does not. I suggest that such a list should be included to help users of the plan (builders, developers, home buyers, etc.) to identify areas undergoing transition or locations where conflicts between uses may surface.

The 2003 goal to promote a safe and firewise development pattern is no longer in the Plan. Given the difficulties of the last year, and the continuing threat of wildfire, I suggest that goal be included in the 2013 plan.

Suggested language:

Goal 7: Promote safe and firewise development patterns

Strategy 7.1: Require reduction of flammable vegetation and materials in and around structures.

Strategy 7.2: Implement the firewise provisions of the 2002 Wildland/Urban Interface Code (or more recent revisions as applicable).

Also suggest restoring

Goal 2 : Maximize the effectiveness of existing infrastructure facilities. (This goal and strategy 2.1 were removed in the October 2013 edits by Council and staff).

Strategy 2.1: Encourage infill development by clearly defining and offering incentives for compact forms.

In keeping with recommendations from various open space advocacy groups over the years, I also suggest the following additions to strategy 2.2 in the current draft:

Strategy 2.2 Consider the use of bonding options for major Capital Improvements such as the airport expansion, development of a convention center, acquisition of open space, or transportation related improvements.

I suggest the inclusion of two other goals that were part of the 2003 plan an which, I believe, are still relevant for the City:

- Goal to maintain enterprise funds as self-sufficient, and
- Goal to continue proactive planning for capital improvement needs.

Suggested language:

Strategy 4.2: Maintain the self sufficiency of the City's enterprise funds by regular review and update of applicable user fees.

Strategy 4.3: Continue proactive planning for capital improvement needs by maintaining a rolling five year capital improvement plan and conducting an annual re-evaluation of capital improvement plans.

Circulation Element

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Most of this element is virtually the same as before. However, I would note that the fall 2013 revisions by City staff and Council took out many references to transit, bikeways and pedestrian amenities. While the content is not materially different, there is a subtle shift in emphasis which I believe does not reflect the committee's consensus nor the community support for these alternative modes of transportation.

I was surprised that this element does not include any narrative, goals or strategies to accomplish local and regional transportation planning. I suggest that a section on transportation planning be added. Sections 7.9 and 7.10 from the 2003 plan would be a good starting point. At a minimum, the circulation element should reflect how we do transportation planning and how the City integrates land use and transportation planning. These goals would also demonstrate how the community might achieve the "complete streets" concept outlined in various sections of the plan.

In the past, the City has used an advisory committee composed of citizens and staff members to review and make recommendations on transportation planning and traffic safety matters. Among other duties, this group would hear Citizen requests and/or comments regarding needed traffic studies, priorities for street maintenance and construction, locations for installation of traffic lights or traffic calming devices and the group in turn would provide recommendations on these issues for City staff and City Council consideration . In the early 1990's, this function was carried out by the Prescott Transportation Advisory Commission, and later this work was conducted by the Transportation Coordinating Committee. However, in recent years this advisory group has been disbanded. Since the community continues to be very concerned with traffic safety matters, I would recommend that the Transportation Coordinating Committee(or a similar tasked advisory group) be re-constituted to again provide a forum for reviewing citizen concerns on traffic safety matters and making recommendations on transportation planning. If such a group is re-established, then goals and strategies that outline it's role in transportation planning should be include in this section of the General Plan.

7.9 LOCAL LEVEL TRANSPORTATION PLANNING

The City created an Assured Streets Program through a sales tax dedicated to streets which was originally approved by the voters in 1995. This sales tax has been extended twice, first, an extension of the 1% tax through 2015 with a portion of those revenues to be used for open space acquisition, and a later extension of the tax at .75% through 2040 to be used exclusively for streets. This dedicated tax provides for construction and maintenance of streets throughout the community.

Long range planning at the local level for Prescott includes the five-year Capital Improvement Program (CIP), transportation elements of Specific Are Plans, Master Plans and Neighborhood plans as well as the Circulation Element of the General Plan. The CIP is reviewed annually by the Public Works Department and acted upon by the City Council as part of their annual budget decisions. Specific Area Plans, Master Plans and Neighborhood plans and the General Plan identify needs and guide the priorities of the CIP.

There is a need to continually improve long-range transportation planning for the City of Prescott. Of major importance is the need to develop an in-depth detailed Transportation Plan focused on the City of Prescott, but developed in coordination with the Central Yavapai Regional Transportation Plan. As the City's population grows, the community builds out, and planned future land uses are implemented, then the goals, objectives and details for Prescott's Transportation network can be formulated along with the Capital Improvement Plan to implement them. These plans, at a minimum, should include financing, prescribed levels of service, and transit/non motorized circulation dimensions.

7.9.1 Local Level Transportation Planning Goals and Strategies

Goal 1: Develop and periodically update a Transportation Plan focused on Prescott specifically.

Strategy 1.1 Ensure that this plan addresses sidewalks, bicycle routes and analyzes the potential impact on the transportation network of a "full-build out" to the ultimate city limits of Prescott.

Strategy 1.2 The Transportation Plan should include data analysis on the current travel habits of Prescott residents, including:

- Number of daily trips by dwelling unit and the various modes used for those trips.
- The range of each daily trip in terms of length, and the time to complete the trip.

Strategy 1.3 Include in each Transportation Plan update a capital improvement program for roads, sidewalks and bicycle routes which is prioritized within financial constraints.

Strategy 1.4 Continue and expand as feasible the cooperative effort with the Prescott Unified School District to use school buses for public transit during city sponsored special events and holidays.

7.10 REGIONAL TRANSPORTATION PLANNING GOALS AND STRATEGIES

Regional transportation planning has been enhanced by the formation in the early 2000's of a Metropolitan Planning Organization (MPO) that covers the quad City (Prescott, Prescott Valley, Chino Valley and Dewey Humboldt) region of central Yavapai County. An MPO is formed when an area reaches population thresholds that indicate the area is transitioning from rural to semi-urban or small urban status. This organization, the Central Yavapai Metropolitan Planning Organization (CYMPO), is the designated transportation planning entity for the region, and is specifically tasked with planning, prioritizing and directing the flow of federal transportation dollars within the geographic area encompassed by CYMPO's planning boundaries. Prior to the formation of CYMPO, communities within the quad City area had been voluntarily cooperating with Yavapai County and the Arizona Department of Transportation on regional transportation planning for nearly two decades. This history provided a smooth transition to the new MPO planning arrangement. Working cooperatively the regional communities, along with Yavapai County and the Arizona Department of Transportation, jointly funded a Central Yavapai Regional Transportation Plan in 1995 to provide population and employment growth estimates and forecast traffic movement patterns to guide future planning of the regional transportation network. The original plan was updated in 1998, and again in 2004 as one of the first projects of the newly formed Central Yavapai Metropolitan Planning Organization. The plan underwent additional minor revisions in 2010, and as this General Plan was being drafted, CYMPO had issued a Request for Proposals to do a major update to the Regional Transportation Plan. The updated plan will continue to be the basis for new investments in the regional transportation network.

7.10.1 Regional Transportation Planning Goals and Strategies

Goal 1:	Promote a safe, e4fficient, multimodal and interconnecting regional transportation system based on coordinated regional planning and inclusion of bicycle, transit and pedestrian improvements.
Strategy 1.1	Coordinate future arterial and major collector roadway alignments and region wide bicycle, transit and pedestrian routes and facilities with surrounding jurisdictions to assure appropriate connectivity.
Strategy 1.2	Construct identified transportation network priorities as public and private funding becomes available.
Strategy 1.3	Continue to take an active role in regional planning forums, such as the Central Yavapai Metropolitan Planning Organization, to ensure that the concerns of Prescott are given due consideration and that land use planning is an integral part of the process.
Strategy 1.4	Adhere to the circulation plans incorporated in Specific Areas Plans, Master Plans and Neighborhood plans to ensure their timely implementation.
Goal 2:	Achieve a regional, accessible transit system to provide easy access for commuters, students, shoppers, and a transportation option for all citizens who choose not to, or are unable to drive.
Strategy 2.1	Work within the framework of the Central Yavapai metropolitan Planning Organization to implement the strategies outlined in the Transit section of this circulation Element.
Goal 3:	Develop trip information data for the City and surrounding area within the planning boundary of CYMPO.
Strategy 3.1	Encourage CYMPO to develop a database for current and future circulation planning to include trip information relative to trips per dwelling unit; modes used for these trips; trip lengths and vehicle occupancy rates. This database should provide information separately for each jurisdiction within the planning area, as well as for the whole planning area.
Strategy 3.1	Develop a separate data base for Prescott, including trip statistics, trip lengths, travel modes used, vehicle occupancy numbers, etc.

Open Space

Very few changes from 2003 draft, but I see one significant omission: the criteria for prioritizing parcels for preservation or conservation of open space. We might address this by referring to the Open Space plan which could give more details on the criteria used. Note: I'm not suggesting a list of priority parcels; I'm suggesting that we need to include criteria on how we develop that list, and /or ascertain if a particular parcel is suitable for acquisition.

Environmental Planning Element

Dark Sky goals and implementation strategies have been added to this element, which is a good addition. However, as discussed in the P & "Z hearing, strategies for maintaining "dark sky" compliant lighting in residential areas should not be overly prescriptive (e.g. specifying lumen levels) in the General Plan. Details for compliance are better placed in other documents such as the land development code.

Water /resources Element

Same issue as noted in the growth management element. This draft doesn't adequately elucidate relationship between growth and water supplies. Also, the 2003 plan specified that imported water would be used for safe yield (the idea behind the Reasonable Growth Initiative), but this plan does not include that goal. Good additions on emerging contaminants. The Reasonable Growth Initiative (Proposition 400) should probably be referenced in this element (it is included in the land use element) as it does mandate certain uses for treated effluent in newly annexed areas of 250 acres or greater.

Economic Development

Although this element discusses housing affordability and the workforce, it removed (from the 2003 Plan) most of the goals and strategies regarding housing. There is a brief mention of CDBG as the solution to workforce housing. However, while CDBG can be a good vehicle to address low income housing, it is not the appropriate way to address housing for middle income families.

Suggest including more language in the narrative about the affordability gap for working families and a goal/strategy to support creation of a housing authority that would specifically include those federal programs designed to expand home purchase opportunities for working families.

This element is not significantly different from the 2003 Plan. However, wording changes here and there along with the addition of a couple of new strategies mean a subtle shift of emphasis away from industrial and commercial development (a source of higher paying jobs) to more reliance on tourism as a cornerstone of the City's economy.

It should also be noted that the City is currently updating the Airport Business Plan. Depending on the timing, it may be appropriate to incorporate the main strategies goals/strategies from that process into the General Plan draft.

Community Quality

I had been concerned that the goals and strategies for the police department had been left out of the documents. However, staff assured me that these goals had been included, and when I re-checked the website, they were indeed there.

The staff and Council review of the document made some interesting changes to this section, References to Prescott Public Library were changed to just Library and the goal and strategy to support the Yavapai Library Network was removed. My question is why?

The section on healthcare doesn't particularly address behavioral health services although there are many BH healthcare agencies in the communities including West Yavapai Guidance Clinic which is a major employer in the community. This element also does not note the large recovery community in

Prescott, nor mention the many concerns that have been raised in recent years regarding recovery group homes. I suggested to P & Z that this element might be an appropriate place to include a discussion of those community concerns regarding recovery homes. P & Z Chair Tom Menser asked me if I might craft some language on recovery homes that might be included in the Plan. I am willing to assist with this process, but would need more information from the City before proceeding. In recent months the City has made some changes to City Code to address group home problems, and that language (and the research that supports those changes) should probably be reflected in the General Plan—maybe in this element, and also in the Land Use Element.

In my opinion, we have not yet clearly defined the problem:

- Do we have a problem with the type of homes operating in the community?
- Are there too many of a particular type of home?
- Is there too great a concentration of a particular type of home in certain neighborhoods?
- Is there a problem with operators of group home supervising their residents or enforcing established group home policies?
- Which of these homes, if any, are licensed? And which, if any, are operating in such a manner that they should fall under licensing guidelines? (This is a critical question since licensed facilities do have to comply with certain regulations and are overseen by state licensing agencies. Whether or not a particular home has to be licensed usually relates to two issues: what services/activities (i.e. treatment) are taking place at the home/facility, and what is the nature of the relationship between the operator and the residents (service provider & clients or landlord/tenant?)
- The nature of the activities taking place on the premises also have implications for whether or not the home is a "business", subject to use restrictions and/or different taxation.

Obviously, the answers to these questions would better define the problem(s), and therefore better inform any suggested goals and strategies for addressing the concerns.