



Cornville Community Association
P.O. Box 1452
Cornville, Arizona 86325

April 6, 2009

Mayor Diane Joens
City of Cottonwood
827 North Main Street
Cottonwood, AZ 86326

Dear Mayor Joens:

On behalf of the Cornville Community Association, I offer the following comments on the City of Cottonwood's proposed annexation of a 6,479-acre block of State Trust Land northeast of the City. Our Planning and Zoning Committee discussed the proposal on March 4 and April 1; and the following comments have been reviewed and approved by the Board of Directors. We come from the perspective of a neighboring community; and our comments are based on the well-recognized *Cornville Community Plan*, (adopted by Yavapai County Supervisors, May 16, 2005) and other planning documents.

In 1998, several Verde Valley communities signed "*A Resolution...Establishing Common Bonds and Principles for Regional Cooperation and Coordination in Land Use Planning and Development Decisions in the Verde Valley*" (Yavapai County Resolution 1156, 11-16-98). Diane Prescott, then President of the Cornville Community Association, signed the resolution on behalf of the Cornville community. We are committed to the first principal, which states that "*Verde Valley communities should not grow together, regardless of corporate boundaries...*"

When the *Cornville Community Plan* was updated, the planning area was expanded to cover the Cornville postal area, which includes all the State Trust Land being proposed for annexation. The expansion was intended to (1) coincide with neighboring planning area boundaries and (2) allow opportunities to provide input for future decisions affecting lands within the entire planning area. The Cornville community shares Cottonwood's desire to preserve as much of the area as possible and maintain open space between communities.

QUESTIONS: Because of inevitable impacts to the Cornville community, we have basic questions about the rationale, size and scope of the annexation and city jurisdiction over the land prior to development. We assume these questions will be considered and answered in due course.

1. Rationale, Size & Scope of Annexation. The *Cottonwood General Plan* indicates development should be concentrated on the west side of the parcel, nearest to Cottonwood. The *General Plan* actually states "*any land proposed for development should be annexed*". So, why annex now, without a proposal for development? Why not just annex the area where growth concentration was envisioned in the plan? We would strongly prefer that you leave out the eastern portion of the State parcel, keeping open possibilities for State Land Reform or exchange with the Forest Service.

2. **City Jurisdiction.** Why will the City of Cottonwood be in a better position than Yavapai County to control growth and manage open space? Will the City purchase land as open space? What are the benefits of city versus county planning and zoning ordinances? What services will the City provide and when? What effect will City jurisdiction have on current land uses in the annexation area? Since the city prohibits the discharge of firearms, will the City take away the privilege of hunting and shooting in the annexation area? Will it take on the burden of cleaning up litter and getting rid of transients?

COMMENTS: The topography and the vacant lands that surround Cornville provide a natural buffer and protection from the lights and sounds of nearby municipalities. The importance of the area's rural values cannot be overstated. Big views, quiet atmosphere, clear air and dark skies are the key attributes that attract people to Cornville and make it a pleasant place to live. Clearly, the proposed annexation will have significant impacts on Cornville and its vision for the future (*Cornville Community Plan, Vision Statement, page 13*). The vision is stated here, with emphasis added.

"The community is framed by bluffs, hills, mesas and dry washes, primarily on natural open spaces. The surrounding National Forest Lands offer scenic vistas and outdoor recreation opportunities ... Growth is managed in keeping with rural residential character, natural resource values (including water availability) and economic sustainability ... Residents enjoy a variety of lifestyles. All appreciate a quiet atmosphere and dark skies apart from urban lights, sounds and congestion Modern highways, country roads, and a system of trails follow historic settlement routes and connect low-density residential neighborhoods, planned developments, private retreats, farms, ranches, and small commercial districts. The community is free of heavy commercial and industrial development. Private schools, spiritual retreats, bed & breakfast inns, restaurants, vineyards, a farmers market and equestrian centers highlight the area ... developed with natural colors, native plants and materials, rustic features and a rural theme."

1. Commercialization of State Route 89A

"We do not want another Prescott Valley." The Cornville community would strongly object to a wide commercial corridor developed all along 89A through the State land block. The corridor should remain as natural and scenic as possible. Commercial development at the 89A & Bill Gray Road intersection is already predicted; and it should gradually expand outward from there. We favor the mixed-use concept, which allows possibilities for residences within and near businesses; affordable housing options; community service-oriented businesses; and opportunities for shopping and pleasant gathering places for Verde Valley residents. We urge wide roadside buffers, natural colors, unobtrusive signing and low-level lighting to reduce light pollution and make commercial areas attractive to passers by.

Heavy commercial or industrial areas are not appropriate in this rural residential setting. Cottonwood should not be attracting heavy commercial development. It is too far away from the freeway; and it is situated along a unique river corridor. Cottonwood had its industrial era when the smelters denuded the landscape. Another approach must be found. Some light industrial, not dependent on heavy truck traffic and situated close to the city, would be more acceptable.

2. Pattern of Growth

"Stay below the ridge line." Growth of the City of Cottonwood needs to be incremental and gradual from the existing city outward to the northeast—not outward in all directions from a central point within the State block. Establishing a central commercial center at the highest point on the parcel and planning for growth to radiate outward over the entire block is the wrong approach for the Verde Valley. It will become a "bulls eye" that will encourage developers to leapfrog outward before it's time!

We recommend that residential density levels radiate outward in concentric arcs from the Verde River—decreasing from higher densities closer to Cottonwood to lower densities further out. The intersection of Bill

Gray Road and State Route 89A can serve as a hub for commercial activity with higher density residential nearby and lower density residential as it climbs northeastward away from Cottonwood. Ideally, the high ridge line between Mileposts 359 and 360 would become a natural barrier between developed areas and the natural areas beyond. Even if development goes beyond that ridge line, it should remain low on the hillsides to protect the views of the Verde Valley. Planners and developers should work with the landscape and never be allowed to flatten hilltops or re-contour the land in radical ways. The big Verde Valley views **MUST** be kept in mind at all times. We recommend extra-wide landscape buffers along Highway 89A and Cornville Road. We don't think the Verde Valley needs another sea of look-alike rooftops, such as those in Amante.

Low density and very low density residential areas should continue to characterize outlying private lands. If the lands were to become privately owned now, Yavapai County will place underlying RCU2A zoning into effect, so that very low and low density criteria would continue to apply. Horse pastures, hay fields, gardens, farm houses and outbuildings are part of the local scene, too. The rural nature of our area should not have to be compromised.

3. Conservation of Scenic Values

“Fill the Scenic Gap.” Big public natural spaces are the Verde Valley's most important assets. The spaciousness is what brings people here. The overwhelming scenic value of the area must be protected. The City of Cottonwood has an opportunity to establish a precedent and protect the panoramic vistas of the Verde Valley.

a. Scenic Road Designation. In 1993, the Arizona Department of Transportation (ADOT) designated State Route 89A from Sedona to Cottonwood as a scenic road, except for a 10-mile segment between Mileposts 353.5 and 363.5, most of which crosses the State block. In 2006, ADOT completed a Corridor Management Plan for State Route 89A, which provides guidance for scenic designation of the 10-mile “gap”, in keeping with the rest of the route. To make it happen, communities must put together a committee, obtain grant funds and undertake measures to protect the scenic values of the corridor. A scenic viewpoint at the high point near Milepost 359.5 could showcase Cottonwood and the Verde Valley by interpreting the magnificent view—mountains, archeological sites, river greenway, settlement history, significant features and mission church. The Cornville Community Association supports scenic designation of “the gap” and would work cooperatively with the City of Cottonwood. With leadership from the City of Cottonwood, our communities could work together to make it happen.

b. Dark Sky. An extremely important attribute of the Verde Valley is its dark sky; and rapid growth is making light pollution a critical issue. Cornville residents will object strongly if light pollution results from Cottonwood annexation and growth. We expect that outdoor lighting will be shielded; commercial signs, street and traffic lights will be minimized; County standards will not be compromised; and stringent lighting policies will be enforced.

c. National Forest Boundaries. Cornville would like to see generous open space buffers adjacent to National Forest boundaries. Larger lots at the perimeter of developed area would be desirable and appropriate transitions to surrounding open spaces.

d. Unauthorized Uses. Unauthorized camping and use, irresponsible off-road vehicle use, littering, and illegal dumping of household items, old vehicles, construction and landscape materials and vegetative waste are frequent abuses on the State block. We urge the City to protect the lands in ways that will preclude illegal occupancy or damage to the resources. A waste transfer station to deal with garbage is logical and necessary to prevent the continual degradation of prized public lands interspersed within and around Cottonwood and other Verde Valley communities.

e. **Special Areas.** We urge the City of Cottonwood to maximize open space areas within the State block by setting aside 30% and more if possible, by offsetting higher density development for more open areas. The approach taken by the City of Cave Creek, Arizona merits attention; and the purchase of natural areas by the City of Cottonwood would show its commitment to the protection of open space. We believe the following areas should be specifically designated, and if necessary, purchased as open space.

(1) **Northern Foothills.** This portion of the State block, adjacent to the Coconino National Forest, provides a beautiful backdrop and precious habitat for wildlife. The development plan should set aside the area in its natural state to blend with adjacent National Forest.

(2) **Antelope Habitat Area.** The northeastern area of the State block provides habitat for antelope, which are occasionally seen throughout the parcel. Previous State land reform proposals have included protection of these areas; the development plan should do the same.

(3) **Sheepshead Wash** has also been proposed for protection before; and the protection should extend from Coconino National Forest land north of 89A all the way south to where it makes a dramatic entrance back into the National Forest. Establishment of an extra-wide corridor would provide natural cover to accommodate wildlife.

(4) **Spring Creek Greenway.** The Spring Creek drainage is an outstanding natural asset, with one of few perennial streams in the State. It crosses the northeastern corner of the State block and runs from historic Spring Creek Ranch to its confluence with Oak Creek. In conjunction with private landowners and federal managers, a greenway should be set aside to protect the unique riparian vegetation, archeological ruins, fish and wildlife habitat within the drainage area.

4. Roads and Trails

“Stick to existing and historic routes.” For both existing and planned roads, we have many questions about road design, ingress and egress points, traffic control measures and protection against runoff to nearby areas. Expanding transportation routes entails river crossings, impacts to riparian vegetation, and reshaping the topography. Living with existing travel corridors would be more desirable, without making many new ones. Transportation through and around the parcel is a necessity; but must be done to protect the rural integrity of the area.

a. **Cornville Road.** We cannot overstate the stress and concern voiced by Cornville residents about the ever-increasing traffic from Cornville Road onto State Route 89A. This is a big issue; and the proposed annexation will have an extremely significant impact on surrounding areas. Anything that would encourage heavy commercial and industrial development would be a mistake. We would favor working with existing routes SR 89A & 260, with all of their improvements, to accommodate truck traffic through Cottonwood.

b. **Trail Network.** Look for opportunities to integrate a trail network that follows historic routes. Already, the Lime Kiln Trail retraces a historic route used by produce farmers to supply the mines at Jerome. To the south is the Cornville Stage Trail, now in the planning stages, which follows an old transportation route. Old Route 89A and other routes that connected Cottonwood with Cornville, Page Springs and on to Sedona could also become part of a historic trail network. A variety of trails should accommodate multiple users and trail corridors should be extra wide, particularly where vegetation is sparse and expansive views are important. Archeological sites and water structures dot the entire area as reminders of the past. Development should integrate and perhaps revive such features as pieces of history, rather than bulldoze and obliterate them.

5. Water Protection

“Limit water use and treat wastewater.” Water issues always arouse public concerns; and we urge you to respond to questions and address the effects of the annexation on the aquifer.

a. **Water Supply.** Will there be an assessment of the impacts of the annexation proposal on the underlying aquifer and surrounding neighborhoods? Is it true that the City of Cottonwood only requires assurance of a

25-year water supply? Why not 100 years, as required by ADWR? We hope drilling will be limited to the amount actually needed for development to protect people outside the city system that rely on the same aquifer. We expect the City to be mindful of water issues, and require developers to ensure 100 year water supply.

b. Wastewater Treatment. We are pleased that the master plan for this wide area appears to give consideration to sewage treatment and waste disposal needs. Sewage treatment facilities are a must, as opposed to individual septic systems. We favor option two in your preliminary wastewater conceptual plan because it appears to deal with growth in a phased manner, from west to east. Use of effluent and gray water systems should be encouraged. Consider impacts of all water and wastewater projects on neighboring communities. We favor (1) expansion of the City sewage treatment system to the annexed area; or (2) requirements for developers to build waste water treatment systems.

We hope you will respond to our questions and seriously consider our comments. If you must go forward with this annexation, we want to be active participants in the planning process. The outcome is extremely important to Cornville residents. If you have further questions or would like to discuss our concerns, please contact me at 639-0725.

Sincerely,

/s/ Deanna G. King

Deanna G. King, President
Cornville Community Association

cc: CVL Consultants, 4550 North 12th Street, Phoenix, AZ 85014-4291
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