



Table One. Acre Feet Pumped in 5-Mile Zone

Entity/Area	Amount Pumped in Acre Feet
City of San Luis	1,809
City of San Luis Area	5,191
Hillander C Irrigation Dist.	16,000
Total Pumped	23,000

Be that as it may, the importance of this information is linked to the 35,000 acre feet allowance for the Act water requirements. If the City of San Luis were to develop to the east due to land exchanges, land sales, or residential development in the Hillander C Irrigation District, the current city population (18,345) would have to more than quadruple to 91,500 with no reduction in agriculture pumping before total pumping in the 5-mile zone reaches the 35,000 acre feet mark.

An additional issue related to water and water sources is the BOR's contention that all water in the RMP is Colorado River Water. Contrary to the BOR plan statement, the Arizona Department of Water Resources has stated that the Gila River may contribute to the groundwater supply for San Luis. Additionally, this statement brings into question San Luis's right to pump water and the availability of water rights for the Colorado River. Until this issue is settled to the satisfaction of all entities, the city contends that the BOR cannot make a definitive plan statement that may impede the city's ability to provide a consistent source of water.

#### Land Use

Instead of one homogenous Alternative designation for the entire (RMPA), the City of San Luis proposes a mixed designation utilizing both Alternatives C and D. Referring to RMP map VI-I, the city recommends that the areas designated as "Limited Recreation and Development" (LRAD) be granted an Alternative C designation as the sections included in this designation are contiguous with the developed portion of San Luis along Avenue H. Likewise, the city proposes that the area designated as "Restricted Land Use" (RLU) remain the same as the city does not anticipate any residential, commercial, or industrial growth in the ten-year effective period of the RMP or for the twenty-year effective period for the San Luis General Plan. Furthermore, the city is requesting that Alternative C allow commercial development at the level of intensity the San Luis Zoning Code provides under its C2 definition, mixed residential applications, and employment area development around the Rolle Airfield and in Sections 34 and 35 to occur. Specific definitions of all San Luis Zoning definitions are attached to this document for RMP development team review (Exhibit A).

However, development of this type can only take place if the Bureau of Reclamation (BOR) and the RMP development team address land ownership, land exchange, and land sales issues. **As a major document statement, the City of San Luis supports private ownership of BOR lands within the LRAD.** Whether the ownership comes by way of exchanges or outright sales, the city has no preference. In theory, the

BOR could exchange or sell the land in amounts that reflect growth and development patterns this response addresses in the next comment section, **Population Projections**. Thus, the BOR could designate the LRAD an Alternative C development area as amended but adopt the policy of staggered exchanges or sales. In fact, the city would go so far as to recommend that the BOR identify commercial edges within residential areas so that the BOR would realize the highest revenues possible based on a philosophy of "best and highest use" similar to what the Arizona State Land Department utilizes when reviewing land purchase and lease applications. It is also conceivable that the BOR could require land purchasers to set aside a certain percentage of residential developments for specific park uses above and beyond those required in the City of San Luis Subdivision Regulations for retention areas.

There are obvious advantages to the concept of a mixed designation coupled with land exchanges or sales for the RMPA. First, the concept will promote contiguous residential growth in Sections 32, 5, and 8 along Avenue H and prevent leapfrog growth. Furthermore, planned growth lessens the detrimental environmental impacts of constructing belowground infrastructure, particularly construction that will occur within the right-of-way and easements for Juan Sanchez Boulevard (County 23<sup>rd</sup>). Instead of miles of open trenches beginning at Avenue H and extending to the Hillander C irrigation district and beyond, development will most likely occur in 80 to 160 acre segments near existing belowground infrastructure and improved roadways. In the event that developers decide to extend belowground improvements to the Hillander C and San Luis II Port of Entry, the developer might be inclined to construct a sewer line sufficient in size so as to prevent the necessity of reopening a trench to construct a future parallel line. The developer could enter into a payback agreement with the city, and the development adjacent Avenue H and Juan Sanchez Boulevard would help offset the costs of constructing the sewer line the developer assumes.

In addition, land exchanges of no less than 320 acres could work to promote contiguous growth in a similar way. For example, The BOR could encourage land exchanges by private landowners of Sections 12 and 13 of Range 24 West as this would create a contiguous and increased habitat area with the existing RLU area. Specifically, the BOR and the private landowners would rely on appraisals and fair market values to establish the necessary exchange values. The City of San Luis further recommends that BOR allow land exchanges as small as 320 acres so private landowners would be encouraged to exchange as much property as possible while they maintain development corridors such as the one that exists along Avenue E to the San Luis II Commercial Port of Entry. Again in theory, exchanges of this type would occur with BOR lands contiguous to developed properties beginning with Sections 32, 5, and 8 along Avenue H.

Such a concept would also be of benefit to BOR projects and administrative services in providing a substantial and continuing source of revenue. For example, one can use the following area comparables for recent land sales (within the last 5 years) as an estimate for revenue generation from land sales on a segmented basis. As one can see from Table Two, the BOR would stand to receive a projected **\$67,825,024** in revenues based on fair market values for land sales in the first ten (10) years. This revenue would

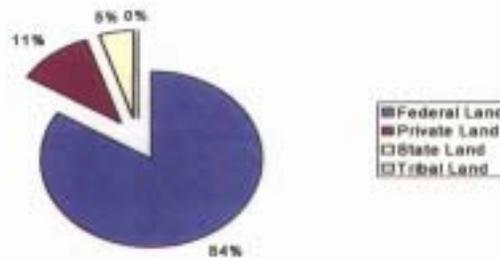
go far in creating/improving habitats and existing recreational areas and supporting the BOR administrative functions.

Table Two. Land Sales Projections

Land Type	Recent Comparable Average/acre	Number of Acres	Total Revenue
Residential	\$17,197	1,152	\$19,810,944
Commercial/Office	\$261,360	128	\$33,454,080
Office/Employment	\$22,750	640	\$14,560,000
<b>Total Projected Revenues</b>		<b>1,920</b>	<b>\$67,825,024</b>
<b>Education Royalties 5%</b>			<b>\$3,391,251</b>

For San Luis, Yuma County, and the State of Arizona, the sale or transfer of BOR and other federal properties means tax revenues to support education with property taxes collected in perpetuity from private landowners. In fact, SCM 1004 introduced in the Arizona State Forty-Sixth Legislature, First Regular Session (Exhibit B), appeals to the Federal Government to address the difficulties western states have with federal land ownership and educational funding. Yuma County's land ownership issues are comparable to those that other counties and western states are experiencing as illustrated in the chart below taken from the Arizona State Parks Department 2003 SCORP Outdoor Recreation Analyses.

Yuma County Land Ownership Percentages



Given these land ownership percentages and the impact of the Barry M. Goldwater Bombing Range size on the Federal Land Ownership, one can still see restrictive impacts federal land ownership has on Yuma County. In the San Luis General Plan planning area, using approximations to determine the total number of acres in the city planning area (37,120), Federal Land ownership constitutes 52% (19,302 acres) of the total available acreage, Private Land ownership 38% (14,080 acres), and State Land 10% (3,738 acres). Even more important to the City of San Luis in these ownership

discussions is the fact that the Federal and State Land comprises the majority of the prime residential, commercial, and employment properties available on the mesa from HWY 95 east along Juan Sanchez Boulevard as evidenced in Fig. 4.3 of the San Luis General Plan (Exhibit C). As discussed earlier, this ownership issue limits the city's ability to allow for the orderly and also timely development of these areas as, in a best-case scenario, federal and state land leases, sales, or patents take at a minimum one year and as much as four years to complete.

As a final note, the City of San Luis recognizes that any land sales will require approval from the United States Congress. However, the city still supports including sale language in the document as it allows for possibility of such actions if Congress receives enough pressure from the Western States to enact such legislation. The city would rather the language be included now rather than amending the RMP at a future date.

**Population Projections**

The San Luis General Plan provides specific population projections for low, medium, and high-density residential build out scenarios as evidenced in Exhibit C. For the purpose of projecting the population in the aforementioned LRAD, the city has identified roughly 8,300 acres of land for commercial and residential development, 1,920 acres for office, light and heavy industrial development, and 1,280 acres for open space/recreation development. Assuming, that developers will utilize a minimum of ten (10) percent of the available land for commercial development, this leaves 7,470 acres for residential development. According to the San Luis General Plan, 4,706 of the remaining acres are designated as Low Density (2-6 du/ac), leaving 2,764 acres for Rural Ranchette development (1-2 du/ac). Based on these figures, the Table 2 below provides population estimates for the entire LRAD.

Table 3. LRAD Population Projections

Type of Development in LRAD	Est. Acres	20% Loss Factor in Remaining Acres <sup>A</sup>	Dwelling Units/Acre	Total Units Maximum (TUM)	Total Population (TUM x 4.31 pph <sup>B</sup> )
Commercial	830	664	N/A	N/A	N/A
Low Density Res.	4,706	3,764	2-6	22,584	97,337
Rural Ranchette	2,764	2,211	1-2	4,422	19,058
Employment	1,920	1,536	N/A	N/A	N/A
Open Space	1,280	1,280	N/A	N/A	N/A
<b>Total Projected LRDA Population</b>	<b>11500</b>	<b>9,200</b>		<b>27,006</b>	<b>116,395</b>

<sup>A</sup>Industry standards allow for a 20% loss of developable land due to below- and aboveground improvements.

<sup>B</sup>Persons per household

Realistically, one cannot assume that the maximum build out will occur in 10 years. A reasonable projection places the LRAD projected population at 15,520 using the following formula:

$$\begin{aligned}
 &30 \text{ Certificates of Occupancy/mo.} \times 12 \text{ mos.} = 360 \text{ du/year} \\
 &360 \text{ du/year} \times 4.31 \text{ pph} = 1,552 \text{ ppy (persons per year)} \\
 &1,552 \text{ ppy} \times 10 \text{ years} = 15,520 \text{ increase in population}
 \end{aligned}$$

The Arizona Department of Economic Security population estimates for July 1, 2002 (Exhibit D) place the current San Luis population at 18,345, a 3,023 increase since the 2000 Census. This trend supports the estimated figures of the aforementioned population forecast and the projected maximum build out population for the entire LRAD. Consequently, these estimates lend to a land development pace of approximately 100 acres per year--1,000 acres over ten years--taking into account allowances for the commercial development and 20% loss factor. Using 2004 as the base year and anticipating a perfectly contiguous growth pattern, Sections 32, 5, and 8 adjacent Avenue H will be completely developed by 2014.

#### **Emergency Services**

Since some portions of BOR lands are located in Yuma County, the City of San Luis and BOR will need to develop intergovernmental agreements for fire and police services in said areas. For BOR lands within the City of San Luis, the fire and police departments shall be the primary responders.

#### **Document Administration**

The City of San Luis recommends that the BOR: include specific definitions for Minor vs. Major Plan Amendments; include a definitive process whereby interested entities can submit items for amendment consideration; and include language requiring a five-year plan review.

#### **Right-of-way and Road Comments**

According to the road development agreement between the BOR and the Yuma Gila Irrigation District, the BOR dedicated 66' along each section line for roadway development. Please refer to Exhibit E for specific detail.

Additionally, the City of San Luis General Plan shows the A Street Truck Route extending east to 10<sup>th</sup>, running south one mile to County 24<sup>th</sup>, and then extending to Avenue E.

#### **Miscellaneous Comments**

The City of San Luis supports Border Patrol's request to extend the safety zone beginning at Avenue G and extending east along the border and beginning at the west edge of Friendship Park and extending west. Conversely, the city opposes any Border Patrol attempt to extend the safety zone within any developed portion of the city, particularly the San Luis Industrial Park and Friendship Park.

In short, the City of San Luis thanks the BOR for the opportunity to respond to the RMP in such a way that both entities can further our already sound working

relationship and work to plan progressively the 30,200 acres addressed in this plan. The issues the RMP addresses are complex and affect the City of San Luis in many ways, but the city hopes the comments included herein provide a basis for discussion so as to limit to possible negative affects and provide a balance between development and conservation. Thus, the City of San Luis--its elected officials and staff--welcome the opportunity to meet with the RMP Development team to create a final document that reflects the willingness of both entities to create a workable final draft.