



**DEPARTMENT OF THE AIR FORCE  
AIR EDUCATION AND TRAINING COMMAND**

17 July 2018

Mr. James R. Mitchell  
Director, Community Initiatives Team  
56th Fighter Wing  
14185 W. Falcon St.  
Luke AFB AZ 85309-1629

Ms. Alexandra Lestinsky, Planner II  
Development Service Department City of Goodyear AZ  
14455 W. Van Buren Street Suite D101  
Goodyear AZ 85338

Re: 18-200-00007; Citrus Farms Rezone

Dear Ms. Lestinsky

Thank you for the opportunity to provide comments on the Rezone Application for Citrus Farms. The project is located on 45.34 acres located along Citrus Road and North of Indian School Road in Goodyear AZ. The site is located from 1/2 miles outside the 1988 JLUS 65 Ldn "high noise or accident potential zone" as identified by A.R.S. § 28-8461 and is within the "territory in the vicinity of a military airport" also defined by A.R.S. § 28-8461.

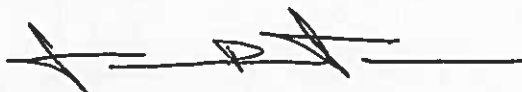
The purpose of this request is to rezone the existing Planned Area of Development from residential / commercial to single family Residential (R1-6). The plan is to develop the site into 110 Dwelling Units for an overall density of 2.42 du/ac.

In an effort to promote a more compatible co-existence Luke AFB follows the guidelines in the Graduated Density Concept (GDC). The GDC proposes, in the absence of a more restrictive state, county or municipal general or comprehensive plan, graduating densities away from the 65 Ldn as follows: a maximum of 2 du/acre from the 65 Ldn to 1/2 mile, a maximum of 4 du/acre from 1/2 mile to 1 mile and a maximum of 6 du/acre from 1 to 3 miles. With a density of 2.42 Citrus Farms will not meet those guidelines.

As described in the narrative the rezone will not negatively impact the Luke AFB Flying Operations. While we have determined that this request exceeds the densities that Luke AFB follows, we recognize that we are not the approval authority. As such, if approved Citrus Farms, will be located within the "territory in the vicinity of a military airport," it will be subjected to approximately 165 over flights a day, with some as low as 1,500 feet above ground level. We recommend you review the sound attenuation requirements found in A.R.S. § 28-8482. In addition, a strong notification program on the part of the applicant would be essential to inform potential residents about Luke AFB operations.

If you have any questions, please contact my Community Planner, Ms. Barbara Plante at (623) 856-9981.

Sincerely

A handwritten signature in black ink, appearing to read 'JRM', followed by a horizontal line.

JAMES R. MITCHELL

cc:

Colonel Michael S. Richardson, Vice Commander, 56th Fighter Wing

Ms. Cindy L. Calderon, GS-13, General and Environmental Law Attorney, 56th Fighter Wing

## Alexandra Lestinsky

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**From:** PLANTE, BARBARA S GS-12 USAF AETC 56 FW/CIT <barbara.plante@us.af.mil>  
**Sent:** Tuesday, July 31, 2018 11:07 AM  
**To:** Katie Wilken  
**Cc:** Alexandra Lestinsky  
**Subject:** RE: Luke AFB Response to Rezoning

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Katie,

Thank you for the question. Yes I did talk with Joe about the Citrus Farms development before we talked to the developer as I wanted to ensure the city wanted this project to move forward. At the 0 to 1/2 mile from the 65 LDN the GDC is 2 DU/AC, however anything 2.49 DU/AC and under we will not have an issue with and would not complain. As long as we can round down to the whole number that meets the concept we are good.

However I have to stay consistent with our letters so you will see two types of comments on our letters when it comes to density that exceed the concept.

(1) "While we have determined that this request exceeds the densities that Luke AFB follows, we recognize that we are not the approval authority." This is for densities that are very close and we can round down to the closest whole number that meets the concept. We feel this provides the city the opportunity to make the decision one way or the other.

Or

(2) In the case of Pebble Springs the density was not close in fact that was almost two times what we like to follow, therefore our letter is much stronger and we say "We have determined that this request exceeds the densities that we follow and the project will have a negative impact of the flying operations at Luke AFB; however we recognize that we are not the approval authority." This is for densities that are not close and we hope the city takes our negative impact statement into consideration while making a decision for approval or disapproval.

Note we appreciate all the cities do for us and since there is no legislative teeth in the GDC concept we rely on you all to follow it when at all possible. However, we also understand the pressure the city is under and want to provide you with the ability to say yes when possible

Based on this conversation I will work on better wording for our comments so it is not confusing to the cities. If we have a project that is able to round down to the nearest whole number to meet the concept it will be something like "It meets the concept of the GDC."

If you still have questions please let me know.

v/r  
Barbara

BARBARA S. PLANTE, GS-12

Deputy Director, Community Initiatives Team 56th Fighter Wing  
14185 W. Falcon Street  
Luke AFB, AZ 85309-1629  
623 856-9981

-----Original Message-----

From: Katie Wilken [mailto:Katie.Wilken@goodyearaz.gov]  
Sent: Monday, July 30, 2018 2:53 PM  
To: PLANTE, BARBARA S GS-12 USAF AETC 56 FW/CIT <barbara.plante@us.af.mil>  
Cc: Alexandra Lestinsky <Alexandra.Lestinsky@goodyearaz.gov>  
Subject: [Non-DoD Source] Luke AFB Response to Rezoning

Barbara,

I hope you are well and surviving the heat. I am reaching out for clarifications regarding one of our current zoning applications. The letter attached called "Citrus Farms Rezone" was sent to us with regards to the zoning proposal east of Citrus Road and south of Camelback Road. Based on previous phone conversations, we understood that Luke AFB made a determination that the zoning would not negatively impact Luke AFB but that the density will have a negative impact on flying operations. However, the letter provided does not state that so I wanted to seek some clarification. I attached the letter and the statement that "the project will have a negative impact on flying operations at Luke AFB" is not in there. If you see the other attached document, "LAFB Review", you see that for a different case that was included. This has led the applicant to believe that Luke AFB has found there are no negative impacts of the proposal. This is not what we understood, which is why we are seeking clarification.

\* Could you please confirm if Luke AFB finds if the proposed density either will or will not negatively impact flying operations?

\* Furthermore, we understood from previous conversations that Luke AFB would find that a density of 2.07 would not negatively impact flying operations. Could you also confirm this or what maximum density that Luke AFB would support?

Please let Alex or I know if you have any questions.

Thank you,

Katie Wilken, AICP

Planning Manager

Development Services Department

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