

Comments on the Draft Regional Plan 2045
By Friends of Flagstaff's Future
12/24/24

Friends of Flagstaff's Future (F3) appreciates the tremendous amount of work that city staff and the Regional Plan Committee have put into the draft Regional Plan 2045. Because we recognize the importance of the document, over the past 60 plus days a committee of the F3 board has read and discussed the draft in great depth and composed these comments.

Since the draft plan focuses largely on the housing crisis, our comments here are primarily responding to the growth and land use policies described in Chapters 3 and 4. We list below our concerns, questions, and suggestions that we hope you will take into consideration as you revise the draft into the final document.

1. **Include an Explanation of The Future Growth Illustration Map:** We recognize the critical importance of the proposed Future Growth Illustration Map, but we are unclear about its intention. If the plan's intent is to accommodate the estimated 50% increase in population by 2045 (from the current 76,500 to more than 116,000), then it would be very helpful to make clear which areas are currently entitled for medium and high density housing and those where the map is proposing density increases. Additionally, an explanation of how the region will change as a result of the increased density is fundamental to the community's understanding of how the proposed goals and policies will change the experience of living in Flagstaff.

Our questions about the proposed Growth Illustration Map land use categories:

- What are the expected density changes in each neighborhood?
- Why are certain areas targeted for densification, while others are not, and why have the levels of densification been selected?
- Why is the Cheshire neighborhood divided into two different densities? (What is the name of the street that separates these densities?) Why is a portion designated suburban density when there is only one commercial use (a gas station and convenience store) in this area? Density, in this case, will undoubtedly increase traffic along Highway 180.
- Why not densify the Milton corridor near NAU as Urban Neighborhood/Urban Center, especially since it is adjacent to the largest employer in the City.
- How will the new density parameters impact existing neighborhoods? It would be very helpful to include examples and photos of existing developments that have the densities being proposed so the public can better understand how their neighborhoods will change. (Examples could include the densities of some of the student housing projects, the condominium project on Ponderosa Parkway, and the condominiums at Beaver and Dale, as well as an explanation of what the dwelling units per acre for a 4-flat would be on a typical lot in the proposed Urban Neighborhood.)

- Why is the land around the Catholic Church designated an Urban Corridor instead of an Urban Neighborhood?
- Why is Section 20 designated Suburban Neighborhood High Density rather than an Urban or Suburban Center?
- Why doesn't Suburban Neighborhood High Density include limited commercial uses?
- Why are some areas designated as Suburban Center and others as Suburban Corridor?
- Why are some areas designated as Suburban Neighborhood Medium Density and others Suburban Neighborhood High Density?
- Why is the neighborhood North of the Hospital (NOHO) divided into two different densities? (What is the name of the street that separates these land uses?)
- Why is the Lone Tree area divided into both an Urban Neighborhood and a Suburban Corridor? (What is the name of the street that separates these densities?)
- What is the vision for the designation of a Suburban Corridor running through the Continental Country Club? (While we support corridors with commercial and higher density housing in all areas including JW Powell, we think the uses need to be made clear in redevelopment areas.)
- Why is the land next to Ft. Tuthill designated an Employment District? The Flagstaff voters rejected this as a hospital site.
- What are the future desired density maximums (p. 4-28) in each of the land use categories? (Some land use categories have maximums while others just have minimums.)

2. **Reduce Car Dependency by Creating Dense and Self-reliant Neighborhoods:** If we're going to experience the 50% increase in population assumed by this plan, why isn't the goal to develop and re-develop neighborhoods that are dense enough to be self-reliant and include commercial and social amenities? Increased density should go hand-in-hand with accessible community amenities, commercial businesses and employment. Otherwise, we will have two extremes: densification in limited areas of town and a heavily car-reliant population in less dense areas. We will be furthering the problems associated with sprawl, including a likely increase in traffic congestion as people seek to meet their daily needs by driving into the urban centers of town. And we will not have significantly addressed our carbon footprint since large portions of the population will live in car-dependent neighborhoods.

Our recommendations:

- Designate all neighborhoods adjacent to large employment centers (e.g., NAU, Gore) as Urban Neighborhoods (e.g., NAU, Gore) as Urban Neighborhoods (e.g., change the proposed Suburban Center designation for the Milton corridor to Urban Neighborhood)

- Delete the Suburban Neighborhood Medium Density land use category as it overlaps significantly with the Suburban Neighborhood High Density land use category and dilutes efforts to achieve density, increase housing stock, and reduce carbon footprint.
 - Where appropriate, designate existing shopping centers with large parking as Urban Centers.
 - Designate state land parcel 30, which is a greenfield, as Urban Neighborhood rather than SNHD. This would enable meaningful commercial development, ensuring less car dependency and greater self-reliance. This area is distant enough from the center of town that it ought to be developed as a “mini-village” in order to break the entrenched and destructive pattern of sprawl.
 - Develop the greenfields in the JWP area as Suburban Neighborhood High Density in order to allow denser development with commercial.
 - Provide safeguards to prevent an increase in suburban sprawl.
3. **Explain How the Costs of Increased Density Will Be Paid For:** It would be helpful to understand how the plan envisions that the increased financial burdens associated with densification will be paid for. Increased density requires increased infrastructure and Flagstaff only has impact fees for police and fire protection. It seems inevitable that the increased costs will be shouldered by the current residents and businesses even though there is little to no certainty that it will ensure that their children and grandchildren will be able to afford to rent or buy a home here.
4. **Make the City Acquisition of Property for Development a Priority:** Because our ability to control private development is limited, it's unlikely that increasing the quantity of housing in and of itself will increase housing availability or affordability. Moreover, there is little in this plan to prevent much of the new development from being investor owned, second homes, and vacation rental properties. The most important complementary strategy available is the City's acquisition of property for municipal housing and open space. We urge you to make this a priority in the plan.

Our recommendations:

- Purchase state land Section 20 so that the city can create a mix of affordable and attainable housing along with commercial, employment and open space uses.
 - Make the securing of funding for property acquisition (of state lands and other appropriate properties on the market) a priority action item.
5. **Acknowledge the City's Commitment to Social & Environmental Well-being, Community Character, and Equity:** We support increasing density but not as the singular aim of development. Density has the capacity to increase the vibrancy of neighborhoods but only if it goes hand-in-hand with other equally important values

such as open-space, social space, quality of the built environment, equity, and neighborhood character. The document's emphasis on increasing density as the solution to our housing emergency should not overshadow the City's commitment to these values.

Our recommendations:

- Make it clear that the aim of densification is community vitality, not simply an increase in housing density or a decrease in the carbon footprint. Include policies that ensure that densification achieves the larger goal of creating vibrant neighborhoods.
 - Make it clear that densification must be linked to social and environmental well-being, community character, and equity.
 - Provide safeguards to prevent gentrification, displacement, and the loss of community character.
 - Give attention to "Community Character" throughout the document and provide guidelines and policies to ensure that densification does not unravel neighborhood "sense of place" (e.g., in Plaza Vieja, Townsite, historic downtown)--and indeed, contributes to place-making.
 - Provide redevelopment guidelines that prevent tear down development and the loss of historic character.
 - Clarify the relationship between neighborhood plans and the regional plan (see page 2-4 of the draft) and how differences will be resolved.
 - Make it clear what the regional plan's vision is for downtown Flagstaff and provide safeguards to protect its historic character and charm.
 - Ensure that architectural and landscape design support and promote quality of the built environment and neighborhood character.
 - Ensure the integration of green spaces, urban trails, and social spaces as elements of densification.
 - Provide strategies for addressing the impact of gentrification on equity. (Redevelopment in our most affordable neighborhoods such as Sunnyside will likely increase rents and displace residents who are the most economically vulnerable.)
6. **Increase Density Incrementally:** We recommend that the city take an incremental approach to increasing density since densification can have unintended consequences such as gentrification and cause an increase in the need for new infrastructure and city services. One strategy is to incrementally allow for increased building heights with a regulation that says that the maximum building height can only be two stories or one and a half times the height of the directly adjacent buildings, whichever is greater.
7. **Ensure the Integrity of the Urban Growth Boundary:** It is our understanding that the RP 2045 Committee gave direction to staff to include a change in policy in the draft that would allow the Flagstaff City Council to provide water and sewer service

outside the urban growth boundary. However, in the draft plan WR.4 maintains the policy that is currently in place: “Provide sustainable and reliable water and sewer services **within** the urban growth boundary.” We did not see any new policy language in the proposed goals and policies chapter although the Implementation Guidelines (page 9-12) contain policies related to providing water service outside the urban growth boundary. Such a major shift in policy belongs in the goals and policies chapter.

We are opposed to providing water outside of the UGB, if that is the intention of this plan. Such a policy conflicts with the major policy of preventing sprawl and increasing density throughout the city.

Our recommendations:

- Clarify the plan’s position on providing water to locations outside the urban growth boundary.
- Amend the final plan WR. 4 to say, “*Provide sustainable and reliable water and sewer services **only within** the urban growth boundary*” and remove the following from pages 9-12, “*Consider expansion of the urban growth boundary in support of economic recruitment and retention and the creation of affordable housing opportunities (City only) and Do not extend water and sewer services beyond the urban growth boundary unless an analysis shows the service can be provided without impacting the availability of water to property owners already within the boundary (City only).*”
- State that any changes to the UGB shall require a Major Plan Amendment.

8. Acknowledge the Trade-offs of Densification and Identify Safeguards: The draft plan implies a number of trade-offs that will ensue from densification. We think it’s important that the public understand the trade-offs that will result as the plan is implemented. For example, while densification may slow the rate of increases in housing and rental prices (though we don’t know this for sure), there are costs associated with it. Right now, the proposed plan will result in reduced parking requirements, loss of native pines, costs for infrastructure expansion, displacement and gentrification, loosened building standards, etc. It also includes such gains as increased walkability, transit access, and possible reduction of our carbon footprint (but see our concerns above regarding sprawl). It is important that these trade-offs be spelled out in the document so that the public can make an informed decision about the plan. It’s equally important that the plan include safeguards to mitigate the costs as well as protect against unintended consequences such as an increase in second homes, demographic inequities, gentrification, etc.