

High Occupancy Housing Zoning Code Text Amendment
Narrative and Regional and Specific Plan Conformance Analysis

Narrative

In February 2018, the Regional Plan was amended, and the High Occupancy Housing Plan (HOH Plan) was adopted to address the community's dialogue on the previously proposed high-intensity mid-rise developments near historic neighborhoods that primarily catered to college students. As outlined in the Regional Plan and High Occupancy Housing Plan (HOH Plan), the adopted goals and policies of these plans intend to enhance and maintain Flagstaff's character and guide future development, which would be considered as High Occupancy Housing Development (HOHD) and Mixed-Use High Occupancy Housing Development (MHOHD). In addition, the HOH Plan contains a list of implementation strategies intended to assist in achieving these goals and policies, several of which include modifications to the Zoning Code.

The proposed Zoning Code Text Amendment (ZCTA) (Attachment Exhibit A to the Resolution) is the first and most significant of the Zoning Code amendments to implement the Regional Plan and High Occupancy Housing Plan (HOH Plan). In addition, the proposed amendment addresses smaller HOHDs that the City Council directed staff to include on October 8, 2019. Therefore, the amendment includes single-family, two-unit (duplex), three-unit (triplex), and multiple-family developments that were not addressed in the HOH Plan.

To implement the goals, policies, and implementation strategies of the HOH Plan, the proposed amendment includes multiple changes to the Zoning Code. New provisions are being added, and several existing regulations are being modified. The most significant of the modifications include the following:

- Removal of the Rooming and Boarding Land Use;
- Incorporation of the proposed High Occupancy Housing Development (HOHD) and Mixed-Use High Occupancy Housing Development (MHOHD) related land uses;
- Incorporation of the maximum bedrooms per acre allowed for developments in the Non-Transect Zones, and additional allowances in the pedestrian shed of an activity center;
- Incorporation of the maximum dwelling units per acre allowed for mixed-use developments in Commercial Zones without a Conditional Use Permit, and additional allowances in the pedestrian shed of an activity center;
- Incorporation of a Conditional Use Permit requirement for an HOHD and MHOHD in the Transect Zones;
- Incorporation of the HOHD and MHOHD use specific standards;
- Incorporation of the Transit Pass Parking Reduction Pilot Program;
- Incorporation and modifications to the parking requirements;
- Incorporation of bicycle space requirements for an HOHD and MHOHD; and
- Incorporation of design requirements for bicycle racks, bins, and storage facilities.

Regional Plan Conformance

Regional Plan Chapter VII – Energy

- Policy E.1.5. Promote and encourage the expansion and use of energy-efficient modes of transportation:
 - a. Public transportation
 - b. Bicycles
 - c. Pedestrians
- Policy E.1.6. Develop land use regulations promoting land use patterns that increase energy efficiency.

To achieve the above-referenced policies, the ZCTA requires HOHDs and MHOHDs with four or more dwelling units to be located in the pedestrian shed of an activity center. One of the HOH Plan’s primary objectives is to promote and provide for the HOHD and MHOHD locations throughout Flagstaff that take advantage of a variety of existing and planned infrastructure improvements. The HOH Plan identifies the Regional Plan activity centers and associated pedestrian sheds (ACAPS) as the most appropriate areas in Flagstaff to locate HOHDs and MHOHDs.

ACAPS are typically served with existing or planned infrastructure improvements that provide alternative modes of transportation (bicycle routes, pedestrian facilities, paths/trails, streets, and/or transit routes) nearby. These areas generally have utility infrastructure that is sized to accommodate an increased development intensity in a mixed-use land use pattern. The referenced land use pattern and existing and planned infrastructure minimizes waste and increases energy efficiency to provide for the immediate and ongoing resource needs. Furthermore, the ACAPS’s intended land use pattern and proximity to alternative transportation modes allow for opportunities to minimize vehicle trips through alternate transportation methods.

The proposed vehicle parking requirements are based on Flagstaff’s actual parking utilization rates for the HOHD and MHOHD development types. These provisions account for the use of bicycles and transit by residents and employees. To achieve the proposed parking rates and to promote the use of multimodal transportation options, the ZCTA also includes new provisions for secure bicycle parking in HOHDs and MHOHDs. In addition, the ZCTA includes a parking reduction program for property owners, which provides free public transit passes to residents and employees. These two provisions intend to promote and encourage the use of bicycles and public transit, which lowers energy consumption and vehicle miles traveled in conformance with the Regional Plan and the Climate Change Action and Adaptation Plan.

Chapter VIII - Community Character

- Policy CC.2.3. Mitigate development impacts on heritage resources.
- Policy CC.2.7. Protect existing historic districts from encroachment by land uses that compromise the historic characteristics of the district.
- Policy CC.2.8. In “Historic” activity centers (Downtown and Five Points), prioritize Community Character (CC) and Downtown (LU.11 and LU.12) goals and policies over the Activity Center goals and policies found in LU.18, when considering cases for rezoning.
- Policy CC.3.1. Encourage neighborhood design to be respectful of traditional development patterns and enhance the overall community image.

- Policy CC.3.2. Maintain and enhance existing buildings and blend well-designed new buildings into existing neighborhoods.

Flagstaff's community character is based on a combination of development patterns that create a unique sense of place. To assist in enhancing, maintaining, and mitigating their effects on the community character, HOHDs and MHOHDs are required to demonstrate compliance with the compatibility provisions that are outlined in the Zoning Code as part of the Conditional Use Permit process. Additionally, any HOHD or MHOHD that is subject to the Zoning Code's heritage preservation provisions is required to obtain a determination from the Heritage Preservation Commission that the development's design has no adverse effects or has appropriately mitigated its effects on the relevant historic cultural resource. An affirmative determination by the Heritage Preservation Commission is necessary for it to be found in compliance with the proposed additional criteria for an HOHD or MHOHD Conditional Use Permit.

In conjunction with the provisions above, building footprint-size and separation requirements have been incorporated. Based on the ACAPS type (Regional, Historic, and all other) in which the HOHD or MHOHD is located, the requirements intend to promote compatible building sizes and proportions that are appropriate to each area. The building separation requirements intend to provide compatible space between buildings based on the development's height. Also, the building footprint-size and separation requirements assist in maintaining the traditional development patterns of existing buildings.

To help mitigate the encroachment of HOHD and MHOHD land use and development patterns that are inconsistent with historic districts and neighborhoods, the ZCTA includes provisions that limit the number of bedrooms that a two-unit and three-unit HOHD or MHOHD are allowed. In addition, some zones contain a maximum number of bedrooms per acre, which HOHDs or MHOHDs may obtain with a Conditional Use Permit.

Chapter IX - Growth Areas & Land Use

- Policy LU.5.5. Plan for and promote compact commercial development as activity centers with mixed uses, allowing for efficient multimodal transit options and infrastructure.
- Policy LU.7.1. Concentrate urban development in locations that use land efficiently, and are served by roads, water, sewer, and other public facilities and services, and that support transit, reduced vehicle trips, and conservation of energy and water.
- Policy LU.10.3. Value the traditional neighborhoods established around downtown by maintaining and improving their highly walkable character, transit accessibility, diverse mix of land uses, and historic building form.
- Goal LU.18. Develop well-designed activity centers and corridors with a variety of employment, business, shopping, civic engagement, cultural opportunities, and residential choices.
- Policy LU.18.1. Design activity centers and corridors appropriate to and within the context of each area type: urban, suburban, or rural.
- Policy LU.18.2. Strive for activity centers and corridors that are characterized by contextual and distinctive identities, derived from history, environmental features, a mix of uses, well-designed public spaces, parks, plazas, and high-quality design.
- Policy LU.18.7. Concentrate commercial, retail, services, and mixed use within the activity center's commercial core.
- Policy LU.18.8. Increase residential densities, live-work units, and home occupations within the activity center's pedestrian shed.

- Policy LU.18.9. Plan activity centers and corridors appropriate to their respective regional or neighborhood scale.
- Policy LU.18.12. Corridors should focus commercial development to the corridor frontage and residential to the back.
- Policy U.18.14. Endorse efficiency of infrastructure with compact development within targeted activity centers.

One of the primary purposes of the proposed ZCTA is to implement the Regional Plan and HOH Plan as it pertains to the development of activity centers, compact development, and appropriate densities that are compatible with surrounding neighborhoods. The ZCTA includes several provisions to address the above-referenced goal and policies, including new land uses. The land uses include the following:

- High Occupancy Housing Development, Single-Family,
- High Occupancy Housing Development, Two-units,
- High Occupancy Housing Development, Three-units,
- High Occupancy Housing Development, Four-units and Greater, and
- Mixed-Use High Occupancy Housing Development.

These new uses and their associated provisions are intended to provide regulations for development types that are currently regulated under broader land uses, definitions, and standards.

One of the HOH Plan's primary objectives being implemented with the ZCTA is the locational criteria for HOHDs and MHOHDs. The HOH Plan identifies the Regional Plan activity centers and associated pedestrian sheds as the most appropriate areas in Flagstaff to locate HOHDs and MHOHDs. Accordingly, the ZCTA includes provisions that require an HOHD or MHOHD with four dwelling units or greater to be located in the ACAPS. The provisions also require any HOHD or MHOHD with more than 50 dwelling units or 125 bedrooms to be located in the pedestrian shed of a Regional Activity Center. It should be noted that the single-family, two-unit, and three-unit HOHDs and MHOHDs are proposed to be allowed in almost all zones that allow the single-family, duplex, multiple-family, and mixed-use land use.

One of the primary purposes of requiring HOHDs or MHOHDs with four dwelling units or greater to be located in the ACAPS is that the areas are typically served with existing or have planned infrastructure improvements that provide alternative modes of transportation (bicycle routes, pedestrian facilities, paths/trails, streets, and/or transit routes) nearby. The availability of alternative modes of transportation may assist with reducing vehicle trips.

It should be noted that the ZCTA provisions also require HOHDs and MHOHDs to be located within 1,320 feet of a permanent transit route unless an alternative distance is approved by the Planning and Zoning Commission. The provisions also require that the distance between the permanent transit stop and the Development Site of the HOHD or MHOHD is measured following a continuously improved sidewalk and/or public paved trail. This provision is intended to ensure that the HOHDs and MHOHDs are provided in a traditional walkable environment.

The ACAPS areas generally also have utility infrastructure sized to accommodate an increased development intensity in a mixed-use land-use pattern. The referenced land-use pattern and existing and planned infrastructure increase the infrastructure efficiencies in the area. Furthermore, the mixed-use land-use patterns of ACAPS encourage land-use efficiencies by allowing complementary residential

and non-residential uses to be near or within the same development. Also, HOHDs and MHOHDs in the ACAPS provide opportunities to incorporate a variety of residential housing choices.

The variety of housing choices, transit location requirements, and the pedestrian-oriented design provisions of the Zoning Code's site design and architectural design standards are intended to provide a community character based on traditional mixed neighborhoods that are walkable and are found within and around Downtown.

To maintain the commercial focus of development adjacent to the commercial corridor streets within the ACAPS, the ZCTA incorporates provisions that require MHOHDs to be adjacent to the referenced streets. In addition, the provisions require HOHDs to be setback at least 300 feet from a commercial corridor street and to have a new or existing commercial development between the street and the HOHD.

To ensure that new HOHDs and MHOHDs contribute to and assist in maintaining traditional and historic building forms, the ZCTA incorporates provisions that are intended to mitigate the building design and be responsive to the contextual area. Most notable is the Conditional Use Permit requirement to demonstrate compatibility with existing developments, which requires compliance with the site plan design standards. The provisions also include building footprint-size maximums based on the ACAPS the development is located in and compliance with the heritage preservation applicable design standards if required by the property's zone designation. In conjunction with the referenced building footprint-sizes and site plan design standards, HOHDs and MHOHDs with two or more units are required to demonstrate compliance with the architectural design standards outlined in the Zoning Code.

Chapter XIII - Neighborhoods, Housing, & Urban Conservation

- Policy NH.1.2. Respect traditions, identifiable styles, proportions, streetscapes, relationships between buildings, yards, and roadways; and use historically appropriate and compatible building and structural materials when making changes to existing neighborhoods, especially in historic neighborhoods.
- Policy NH.2.3. Continue the tradition of multi-story, multi-use buildings to maintain and increase a stable, mixed-income residential population when planning new structures in the downtown and Southside neighborhoods.
- Goal NH.6. Neighborhood conservation efforts of revitalization, redevelopment, and infill are compatible with and enhance our overall community character

The provisions of the proposed ZCTA include a requirement that an HOHD or MHOHD that is subject to the Zoning Code's heritage preservation provisions is required to obtain a determination from the Heritage Preservation Commission that the development's design has no adverse effects or has appropriately mitigated its effects on the relevant historic cultural resource. These provisions are in conjunction with the Conditional Use Permit compatibility requirements when applicable. In addition, the provisions are intended to assist with achieving building and streetscape designs that are compatible with and enhance our overall community character. Furthermore, the provisions do not include limitations in building height or the number of stories that a development may have. This exclusion may assist in providing additional housing options for a mix of incomes.

Chapter XIV - Economic Development

Goal ED.7. Continue to promote and enhance Flagstaff's unique sense of place as an economic development driver.

Policy ED.7.1. Support planning, design, and development that positively, creatively, and flexibly contribute to the community image.

Flagstaff's unique sense of place and community character contributes to many of its economic industries, including tourism and business opportunities. To ensure Flagstaff's unique sense of place is maintained, the ZCTA includes provisions that enhance, maintain, and mitigate the effects that the design of an HOHD or MHOHD may have on the community's character. These provisions include the following:

- Demonstrating compliance with the compatibility provisions that are outlined in the Zoning Code as part of the Conditional Use Permit process; and
- Obtaining an affirmative determination, if required by the property's zone, from the Heritage Preservation Commission that the design of the development has no adverse effects or has appropriately mitigated its effects on the relevant historic cultural resource.

I. High Occupancy Housing Plan

Goal 1: Promote HOH buildings that connect and enhance existing urban patterns and historic activity centers

- Policy HOH.1.1. Repeat the patterns of streets, alleys, buildings, and civic spaces from within nearby historic districts or neighborhoods in the site planning of HOH developments.
- Policy HOH.1.2. Remove policy barriers to new development replicating the patterns of compatible historic districts and historic neighborhoods in order to promote historic context, parking, street patterns, and pedestrian connectivity, through small and medium-scale buildings.

The ZCTA incorporates a building footprint-size for HOHDs and MHOHDs in the pedestrian shed of a Historic Activity Center. Developed as part of the HOH Plan, the maximum building footprint-size of 5,000 square feet for HOHDs and MHOHDs in the Historic Activity Center's pedestrian shed is intended to provide building sizes and proportions that are compatible with nearby historic districts and neighborhoods.

Except for the HOHDs or MHOHDs in a pedestrian shed of a Historic Activity Center on property zoned Commercial Business (CB), building separation requirements have been incorporated into the ZCTA. These requirements are intended to provide adequate space between buildings compatible with the development patterns in adjacent and nearby historic neighborhoods. As it pertains to an HOHD or MHOHD in the pedestrian shed of a Historic Activity Center on property zoned Commercial Business (CB), no building separation is required. The historical urban pattern of these properties comprises structures that are typically constructed up to the property line and abut a structure on an adjacent lot.

In addition, any HOHD or MHOHD that is subject to the Zoning Code's heritage preservation provisions is required to obtain a determination from the Heritage Preservation Commission that the development's design has no adverse effects or has appropriately mitigated its effects on the relevant historic cultural resource. An affirmative determination by the Heritage Preservation Commission is necessary to be

found in compliance with the proposed additional criteria for an HOHD or MHOHD Conditional Use Permit.

Goal 2: Promote HOH primarily as a part of complete activity centers

- Policy HOH.2.1. Ensure that the proportions and design of HOH projects in terms of architecture, connectivity, and public spaces are tied to the activity centers type (urban, suburban), scale (regional, neighborhood, historic), and proximity of historic districts and neighborhoods.
 1. Rezoning properties to allow for large-scale HOH development is appropriate in the commercial core of regional-scale activity centers, when the properties are not located in historic districts and neighborhoods.
 2. Rezoning properties to allow medium- and small-scale HOH buildings can be appropriate in neighborhood-scale activity centers when they are centrally located, and can be located in the pedestrian shed of regional centers when they address the transition between larger HOH development and the surrounding neighborhoods.
 3. Small-scale HOH is preferred in historic activity centers. Medium scale HOH may be appropriate in the commercial core of Downtown when designed with consideration to the historic context.
- Policy HOH.2.2. HOH buildings are designed to be pedestrian oriented at the street level, and to create vibrant and active civic spaces for both residents and neighbors.
- Policy HOH.2.3. Break up building footprints as well as their bulk and mass in order to ensure transportation connectivity and a comfortable pedestrian environment across HOH project sites in accordance with the characteristics of urban and suburban areas in the Regional Plan. Allow for modifications that take into consideration site constraints outside the control of the property owner, such as topography, natural and cultural resource protection, etc.
- Policy HOH.2.4. The design of HOH buildings creates opportunities for interactive spaces with surrounding neighborhoods and businesses through the location and style of doors and windows facing the street, or the design of other pedestrian environments, such as a courtyard or plaza. These features benefit the HOH and are an enhancement for existing business and cultural opportunities nearby.
- Policy HOH.2.5. Discourage HOH locations that are not served by NAIPTA's permanent transit network, and that do not have multimodal access to Downtown or another major employment or activity center (Milton Rd, NAU, FMC, etc.).
- Policy HOH.2.6. HOH buildings in activity centers should add to the diversity of housing choices for the entire community, and provide for the housing needs for multiple facets of the Flagstaff population.

To achieve the intent of the above-referenced goal and policies, the ZCTA incorporates provisions that are intended to mitigate the design of HOHDs and MHOHDs while being responsive to the contextual area. Most notable is the Conditional Use Permit requirement to demonstrate compatibility with existing developments, which requires compliance with the site plan design standards. The provisions also include building footprint-size maximums based on which ACAPS the development is located in and compliance with the heritage preservation applicable design standards if required by the property's zone designation. In addition to building footprint-size maximums, HOHDs and MHOHDs containing two units and more are required to comply with the Zoning Code's architectural design standards. In

conjunction with the referenced building footprint sizes, the architectural design standards help break up the footprint, bulk, and mass of a building. Furthermore, the standards help ensure that the building and site designs incorporate and provide pedestrian-oriented environments and allow for interactive spaces.

To assist in ensuring that an HOHD or MHOHD has access to transit, HOHDs and MHOHDs containing four units or greater are required to be located within 1,320 feet of a permanent transit route. The Planning and Zoning Commission is allowed to approve an HOHD or MHOHD at a distance that is greater than 1,320 feet of a transit route when the route to the transit stop has adequate nighttime lighting and does not have a significant grade change and the distance does not impede reasonable access to the transit. It should be noted that the distance between the permanent transit stop and the Development Site of the HOHD or MHOHD is measured following a continuously improved sidewalk and/or public paved trail.

In addition to the above-referenced provisions, the ZCTA includes requirements for HOHDs and MHOHDs that contain four units or more to provide diversity in unit types. These provisions assist in providing multiple housing choices. The proposed bedroom-to-dwelling unit ratio and the minimum number of one-bedroom units and the maximum number of dwelling units containing four bedrooms or more intend to achieve unit diversity.

Goal 3: Leverage HOH to create more efficient and equitable transportation

- Policy HOH.3.1. Increase multimodal performance and options with the development of HOH projects, and continue to tie performance to parking and traffic requirements.
- Policy HOH.3.5. Encourage property management companies of HOH to offer tenants reduced or free bus passes as part of their rental fees.

To achieve the intent of the above-referenced goal and policies, the ZCTA incorporates provisions to promote multimodal transportation options. The provisions include requirements for HOHDs and MHOHDs to provide secure bicycle parking and to be located within 1,320 feet of a permanent transit route, unless an alternative distance is approved by the Planning and Zoning Commission. It should be noted that the distance between the permanent transit stop and the Development Site of the HOHD or MHOHD is to be measured following a continuously improved sidewalk and/or public paved trail. Also, the proposed parking requirements are based on Flagstaff's actual parking utilization rates for HOHD and MHOHD types, which account for typical bicycle and transit transportation usage.

In addition to the above provisions, the ZCTA includes provisions that allow a property owner to reduce a development's parking requirement by providing free transit passes to tenants and employees. It should be noted that the proposed Transit Pass Parking Reduction Pilot Program is a temporary program that will expire on December 31, 2026, unless extended by the City Council. The intent of the expiration timeframe is to allow time for the staff to evaluate the program's effectiveness and return to the City Council with a recommendation as to whether or not to keep the program. Also, the transit pass requirement is perpetual. A property owner may be released from the transit pass requirement if the owner provides additional parking that is equal to or greater than the amount that was reduced.

Goal 6: Reduce waste and increase energy efficiency of HOH developments

- Policy HOH.6.1. Promote materials management strategies in HOH buildings that increase recycling rates and extend the life of the Flagstaff landfill.

To achieve the intent of the above-referenced goal and policy, the ZCTA incorporates provisions that require the property owner of an HOHD or MHOHD with four dwelling units or more to obtain approval of a waste management plan from the City’s Public Works Director, or designee, prior to the approval of the site plan that is required for the Conditional Use Permit. Also, the ZCTA incorporates provisions that require the property owner to provide all necessary improvements to the property to implement the approved waste management plan.

Goal 7: Improve NAU and City programs and tools for managing off-campus student housing

- Policy HOH.7.7. Require every HOH development to have a safety plan and review on file with the Flagstaff Policy Department Crime Free Multihousing program.

To achieve the intent of the above-referenced goal and policy, the ZCTA incorporates provisions that require the property owner of an HOHD or MHOHD with four dwelling units or more to participate in the City’s Crime Free Multi-Housing Program. In addition, the ZCTA incorporates related provisions to assist in the implementation of the program. It should be noted that the Crime Free Multi-Housing Program is a rental housing program, and the ZCTA incorporates provisions to allow the Police Department’s Crime Free Multi-Housing Program representative to exempt properties, such as owner-occupied developments, from the requirement.

Goal 8: Promote economic resiliency through building design in HOH developments

- Policy HOH.8.3. Integrate HOH developments with employment uses in order to attract appropriate talent and support workforce housing.

The proposed HOHD and MHOHD land uses are permitted in various zones that would allow for the integration of employment uses in a horizontal or vertical format. In addition, ZCTA provisions require HOHDs and MHOHDs that contain four dwelling units or more to be located in ACAPS. The ACAPS are intended to be comprised of a mix of land uses that are nearby and contain a variety of infrastructural resources (bicycle routes, pedestrian facilities, paths/trails, streets, transit, and utilities). With the integration of HOHDs and MHOHDs into the ACAPS, it is anticipated that these areas may be attractive to lower-impact employment uses (office, banks, services, etc.) and the integration of a variety of housing choices.

La Plaza Vieja

GOAL #6N: Preserve the neighborhood core as a predominantly single-family neighborhood.¹

- Policy 6N.5: Provide adequate parking on-site for residential units in the Neighborhood Core. It is preferred that on-site parking be located along the alley or behind the main residence.
- Policy 6C.5: High occupancy housing, such as rooming and boarding, single room occupancy, and dormitories, may be permitted provided that the project mitigates the effects on the neighborhood including appropriate architecture, increased parking to account for occupancy, landscaping, traffic calming, and street trees.

¹ The Neighborhood Core in the La Plaza Vieja Neighborhood Plan is mostly zoned R1N which allows single-family homes, duplexes, and accessory dwelling units. Therefore, the regulations for one- and two-dwelling unit HOHDs were considered in this analysis.

To address the above-referenced goal and policies, the ZCTA incorporates various parking requirements based on a development's total number of bedrooms. To minimize the impact of single-family, two-unit, and three-unit HOHDs and MHOHDs, the provisions require one parking space for each bedroom. This provision ensures adequate parking is provided on-site for HOHDs and MHOHDs that are allowed in the neighborhood core areas. Larger HOHDs and MHOHDs are required to provide one space for each bedroom for the first 75 bedrooms of a development and a reduced rate for each bedroom above 75. The larger an HOHD or MHOHD is, the more parking efficiencies are realized per bedroom. The proposed parking requirements are consistent with Flagstaff's actual parking utilization rates and the City's objectives for HOHDs and MHOHDs.

Southside

GOAL S 10. Make parking management more effective through partnerships and design.

- Policy S 10.1. Continue to coordinate efforts between student-centric housing developers, the City, and NAU to mitigate parking impact on Southside residents.

GOAL S 11. Develop the supply of public parking in the Southside to balance the needs of businesses and residents.

- Policy S 11.1. Increase off-street parking availability for new residences on small lots through shared parking plans, and increase private parking lot development to address the increasing number of bedrooms and higher occupancy, especially south of Butler Avenue.

The ZCTA incorporates varying parking requirements based on a development's size to address the above-referenced goals and policies. In addition, the parking requirements are based on the number of bedrooms that an HOHD or MHOHD contains. Consistent with Flagstaff's actual parking utilization rates for the HOHD and MHOHD types, the proposed regulations are intended to ensure adequate parking is provided.

Conflicting Regional Plan Goals and Policies

- Policy ED.4.2. Promote variety and flexibility in land use and development options within the urban growth boundary.
- Policy LU.1.6. Establish greater flexibility in development standards and processes to assist developers in overcoming challenges posed by redevelopment and infill sites.

The ZCTA incorporates provisions for HOHDs and MHOHDs that are currently regulated under broader land uses, definitions, and standards. The provisions include definitions, land uses, and property development, and use specific standards and parking standards for HOHDs and MHOHDs. As part of the proposed regulations, a development that is considered to be an HOHD or MHOHD with four dwelling units or more will be required to be located in the pedestrian shed of an activity center. The proposed locational requirements reduce the areas of the city in which an HOHD or MHOHD with four dwelling units or more may be developed. At the same time, this change provides more predictability because ACAPS are more appropriate locations from the standpoint of available infrastructure and multimodal transportation options (bicycle, transit, path/trails, etc.) accessibility.

The proposed amendment includes a new variety of land uses, although the associated provisions minimize options and flexibility for development types considered as an HOHD or MHOHD. The provisions do not include regulations to assist developers in overcoming challenges posed by

redevelopment and infill sites. Also, the requirement to obtain a Conditional Use Permit for an HOHD or MHOHD may be perceived as limiting to developmental flexibility. Furthermore, the amendment provisions, such as the parking requirements, may be an additional challenge for some redevelopment or infill sites.