

PLANNING AND DEVELOPMENT SERVICES REPORT
MAJOR REGIONAL PLAN AMENDMENT

PUBLIC HEARING
PZ-21-00129-01

DATE: October 6, 2021
MEETING DATE: October 28, 2021
REPORT BY: Sara Dechter, AICP

REQUEST:

Major Regional Plan Amendment, by the City of Flagstaff, to amend pages IV-11, IV-12 and X-19 of the Flagstaff Regional Plan 2030 to reflect the City's Carbon Neutrality Plan.

STAFF RECOMMENDATION:

Staff recommends the Planning and Zoning Commission, in accordance with the findings presented in this report, forward the Major Regional Plan Amendment request to the City Council with a recommendation for approval.

I. Project Introduction

A. Background/Introduction

The proposed text amendment will update the Flagstaff Regional Plan 2030's discussion of climate change and climate action to align with the City of Flagstaff's climate action goals. The climate action work of the City has evolved rapidly since the 2014 adoption of the Regional Plan, creating a gap between the guidance provided in the Regional Plan and the City's declared climate goals and the ambition of its climate actions. In June 2020 following the declaration of a climate emergency, the Flagstaff City Council adopted the Flagstaff Carbon Neutrality Plan. The Carbon Neutrality Plan "establishes a vision for how Flagstaff will create a carbon neutral future" through climate actions that support adaptation, mitigation, and equity.

The Carbon Neutrality Plan has three goals:

1. Achieve carbon neutrality by 2030.
2. Prepare Flagstaff's communities, systems, and resources to be more resilient to climate change impacts.
3. Address climate change in a manner that prioritizes those most impacted and ensures the costs and benefits of climate adaptation and mitigation are equitably distributed.

The Flagstaff Regional Plan 2030's goals do not reflect the urgency of the new policy or the strength of the community's objectives for more aggressive climate action. This amendment will restore alignment between the Regional Plan and the declared climate goals, clarifying the carbon neutrality goal and the types of climate action the City will take.

B. Proposed Amendment

This application proposes a major amendment to the Flagstaff Regional Plan 2030. The proposed amendment is within the Climate Change and Adaptation section of the Environmental Planning & Conservation Chapter -pages IV-11 and IV-12. The proposed changes to pages IV-11 and IV-12 include:

- Changes to the narrative
- Revisions to goals E&C.2 and E&C.3
- Revisions to policies E&C.2.1, E&C.2.2, E&C.3.2, and E&C.4.1
- Addition of three policies: E&C.2.3, E&C.3.5, and E&C.3.6

In addition to the text revisions on the Climate Change and Adaptation pages, this amendment also includes a wording revision to policy T.8.1, in the Transportation chapter (located on page X-19). This change is being made because of the compatibility review among the proposed revisions to the climate pages and the existing Regional Plan goals and policies. This revision will clarify the meaning of T.8.1 and align with how staff understand the meaning of the policy.

II. Evaluation

The Inter-Department Staff (IDS) deemed the application for the Major Plan Amendment to be complete on June 1, 2021 and to be substantively complete on July 29, 2021.

The applicant began the required 60-day public review and review by federal, state, and local agencies and utilities, on July 13, 2021.

A. Impact analysis

Major regional Plan amendments are required to have qualitative impact analysis completed so that the implications of the policy changes being considered can be understood by the Planning and Zoning commission and City Council. Because this is a text amendment with city wide implications, the Planning Director has waived the requirements for: Water and Wastewater Impact Analyses, Cultural Resource Studies, and School Impact Analysis

i. Public Services and Facilities Analysis

This amendment supports a more equitable and resilient response and preparedness for stormwater events, which are expected to increase in frequency and scale due to climate change. It will also help prepare for securing the water system in case of draught and other climate events.

In terms of public facilities, the energy efficiency and cost of energy will be reduced by improving efficiency and reducing the reliance on fossil fuels.

ii. Traffic Analysis

The revised climate goals and policies will further the City's already-existing goals to encourage active transportation, support transit use and operations, and reduce congestion. Because transportation emissions are a major contributor to greenhouse gas emissions, achieving carbon neutrality will required strengthened collaboration among City of Flagstaff Community Development Division, Engineering Division, and the Sustainability Section to analyze emissions reduction opportunities and take appropriate action. This objective will be operationalized and bolstered by the Active Transportation Master Plan which is under development.

iii. Economic Development Analysis

Taking climate action and avoiding the worst impacts of climate change makes sense economically and morally. Action is far less expensive and far more beneficial than inaction. Like forest health measures taken to avoid catastrophic wildfire, climate action is an investment in our future.

Implementing carbon neutrality will have a variety of costs and benefits. Benefits will come from the investment in community infrastructure and preparation to reduce the costs of future climate events. It will also come from the jobs created in new energy production, energy efficiency retrofits and construction activities. Many local businesses and hotels are already taking climate action and committing to carbon neutrality. For instance, Arizona Public Service (APS), which is Flagstaff's electric utility company, has committed to transitioning to a 100% carbon-free electric grid by 2050. The ultimate balance of the costs and benefits will depend on the implementation decisions of Council, Flagstaff business and residents over the next 15 years.

iv. Police and Fire Protection Analysis

The revised climate goals and policies will not impact policing or Fire Protection in Flagstaff.

III. **Findings**

An application for a Major Plan Amendment shall be submitted to the Planning Director and shall be reviewed and a recommendation prepared. The Planning Director's recommendation shall be transmitted to the Planning and Zoning Commission in the form of a staff report prior to a scheduled public hearing. The recommendation shall include: an evaluation of (1) the consistency and conformance of the proposed amendment with the goals and policies of the General Plan and any applicable specific plans; (2) a statement of community benefit; and whether the amendment should be granted, granted with conditions to mitigate anticipated impacts caused by the proposed development, or denied.

Major Plan Amendments shall be evaluated based on the following findings:

A. **Finding #1:**

The proposed amendment must be found to be consistent with and in conformance with the goals and policies of the General Plan and any applicable specific plans. If the application is not consistent with the General Plan, and any other applicable specific plan, the applicable plan must be amended in compliance with the procedures established in Chapter 11-10 of the City Code (Title 11: General Plans and Subdivisions) prior to considering the proposed amendment.

i. **General Plan/Flagstaff Regional Plan (FRP 2030) Process and Analysis Summary**

When staff performs a Regional Plan (the "Plan") analysis, staff reviews all maps, text, and goals and policies to determine which are the most relevant in relation to the proposed application. The Plan's Future Growth Illustration on Maps 21 and 22 (same map; one is regional scale and one city scale) and the text of the Plan provide supplemental information for the interpretation of goals and policies.

This Major Plan amendment proposes text amendments to E&C.2, E&C.3, E&C.4 and related policies, the Creation of three new policies under E&C 2 and E&C.3 and a change to Policy T.8.1. While these changes do not alter any of the maps in the Regional Plan, they will all be used in conformity findings for future development cases.

Important to this amendment is the introduction of the concept of equity in protecting vulnerable communities from the impacts of climate change and in considering how the costs and benefits of climate change action are distributed in the community. The current Regional Plan goals and policies do not have a direct statement on equity except in the Chapter X which calls for equity in the distribution of transportation improvements and projects (Policy T.11.4). There are not many direct policies against which to assess this addition. Staff finds that it is fitting with the overall vision of the regional plan to "encourage and advance intellectual, environmental, social, and economic vitality for today's citizens and future generations" (p. I-1).

ii. **Applicable General Plan Goals and Policies**

As part of its review, staff identified relevant Regional Plan Goals and Policies that could be applied to support or not support the proposed Zoning Map Amendment. These goals and policies are located in an attachment to this report and within the developer's narrative. The following is a discussion of how the project generally meets or conflicts with goals and policies in each chapter.

a. **Environmental Planning & Conservation**

The City of Flagstaff is strengthening the language to protect the regions air quality and to increase the collaboration and effectiveness of climate change action in the Region. This aligns with the Carbon Neutrality Policy and the Climate emergency declared by the Flagstaff City Council.

One area of compromise is the protection of dark skies. There are some instances where dark-sky friendly lighting is not the most energy efficient lighting option. This resource will need to be balanced as the city makes lighting investments and updates to the City Zoning and Building Codes. The City can reduce energy use in several areas, whereas the Flagstaff community has limited ways to reduce dark sky pollution due to

technology, the scarcity of the resources and the value of the scientific and cultural contributions of dark skies to our Region. While the dark skies goal (E&C.5) of the Regional Plan does not conflict with carbon neutrality. It requires additional mitigation for both goals to be achieved.

b. Open Space

The increased emphasis on carbon neutrality is in conformance with the goals and policies on Open Space in the Flagstaff Regional Plan 2030. The Regional Plan's goals and policies and future growth illustration are already calibrated to lower-greenhouse gas-emissions land use by promoting density in activity centers and already-developed land (infill). While some may perceive a conflict between open space preservation and development, climate-focused, compact development can support the creation of more legally designated open space properties. The emphasis is not on open space at the maximum quantity but at a quality and location that preserves natural resources and increases the community's resiliency to climate events such as flooding, increasing temperatures and increased risk of wildfires. In summary, dense, climate-friendly development allows more people to live in smaller areas, better utilizing Flagstaff's limited land resources.

c. Water Resources

The water resources goals and policies are linked to climate change and climate action, and are well-supported by the proposed amendment. Climate change will require nimble planning and adaption to maintain our water supply and its quality, manage water demand, prepare water infrastructure and to plan for increased frequency and intensity of extreme weather. The addition of equity considerations to this work is already something the City has been doing in efforts such as the Southside Community Plan and the response to the Museum Fire flood events of 2021. These efforts will be enhanced by the increased emphasis in the Regional Plan.

d. Efficient Use of Energy Goals and Policies

All the goals and policies in the Energy Chapter of the Regional Plan support carbon neutrality. The climate emergency and the proposed Regional Plan amendment will require faster implementation of these goals and work across departments to achieve these objectives in new building construction.

e. Community Character

The Community Character Chapter of the Regional Plan has several policies that overlap with the preservation of open space (CC.1.3 and CC.1.6). Both of these policies can be achieved within the context of the the carbon neutrality amendments proposed.

Likewise, Heritage Resources protection and adaptive reuse (CC.2.10) are supportive of reducing emissions as are managing great streets and transportation corridors to be context sensitive and serve all modes of travel (CC.4.1 and CC.4.4). Water efficient management of urban forests and landscaping will also contribute to reduce energy consumption and preservation of the City's resiliency to climate impacts on our water systems.

Managing scenery and views (CC.1.1) can be a tricky value when trying to address carbon neutrality and there are many perceived conflict depending on what your values are related to these features. The goal in the Regional Plan is intended to convey that "significant" landmarks and other features should be preserved and provides some guidance that significance can attributed to a view for its cultural importance, or the importance of the place from which it is being viewed (i.e. a public park, plaza or Great Street). Preserving the natural setting while increasing the density and intensity of existing areas within the community does not promise that individual views will be preserved. Adding emphasis on carbon neutrality does not change this dilemma. It does increase the importance of identifying significant viewsheds and doing what is legally

feasible to preserve them coincident with the changes the community will need to make to achieve carbon neutrality.

f. Growth Areas & Land Use

The Growth and Land Use chapter envisions a community whose land uses promote connectivity, walkability, efficiency, health, and housing options. Well-planning neighborhoods, activity centers and corridors support by the Growth and Land Use Chapter of the Regional Plan can further the City's proposed carbon neutrality amendments because they focus on compact, efficient development. Neighborhood planning processes can also build resilience by increasing connections among neighbors and adding to neighborhood self-reliance. These land use policies are designed to create a built environment that reduces travel distances and creates opportunities to live and work without needing to rely on an automobile for those who want those housing choices. The Chapter provides guidance on balancing new development with existing neighborhoods and with open space values. All of these goals closely align to the carbon neutrality plan's objectives for future land uses and redevelopment within the City and County.

g. Transportation

The proposed amendment is compatible with the goals and policies of the Transportation Chapter, with the exception of one policy: T.8.1. The applicant proposes to revise this policy to improve clarity and ensure compatibility between the policy T.8.1 and the proposed text amendment; this policy revision is described starting in section II.3, Description and Need.

Many of the goals and policies of this chapter, from those aiming for improved mobility (Goal T.1) to improvements in safety (Goal T.2) to improved transportation infrastructure for all modes (Goals T.3, 4, 5, 6, and 7) are closely linked to climate action. The proposed text amendment in Chapter IV includes more ambitious greenhouse gas emissions goals that will only be achieved through significant changes to Flagstaff's current transportation planning, investments and operations. However, the goals and policies of the Transportation Chapter are pointing in the same direction but the approach to implementing them in the first 7 years of the plan has been more moderate.

T.8.1 under Automobile goals and policies, as currently written, could refer to long distance regional transportation connections that are economically efficient or to network level connections that produce economic activity and vibrancy. The former interpretation is not in line with the carbon neutrality goals and policies being revised in Chapter IV and staff's understanding is that the intent was not to encourage highways or transportation projects that prioritize cars over the multimodal system. The proposed clarifying changes to the text therefore point to the need for network connectivity and not just the most efficient route from one place to another. This is an important concept for carbon neutrality as highly connected street networks are more walkable and produce more equitable access for all members of the community.

There is potential for conflicts to arise when implementing policy *T.8.4. Protect rights-of-way for future transportation corridors* and *T.8.5. Support the area's economic vitality by improving intersection design for freight movements*, because implementation involves choices among competing values when land and budgets are limited –decisions inherent to any transportation project. For T.8.4, the City can mitigate potential climate impacts by conducting evaluations of greenhouse gas emissions and considering route and network alternatives and their relative impacts. For T.8.5, the need for enlarged intersections and turns for freight can be managed using context sensitive solutions and a careful prioritization of modes when considering widening and redesign of intersections.

h. Cost of Development

Goal CD.1 and related policies are about the ability of the City to set fair and reasonable development fees and practices in a transparent manner that considers robust discussions and economic data. Climate action may impact the overall cost of development in Flagstaff but preparing for climate change and improving our infrastructure's resiliency to extreme weather events will in the long term save the public money and reduce the impacts of these expected changes on future residents.

i. Public Buildings, Services, Facilities, & Safety

Goals under Public Buildings, Services, Facilities, & Safety support climate resiliency and forward looking operation and maintenance in a manner that is aligned with the proposed amendments. The chapter also incorporates preparedness and public safety in a manner that anticipates further disruption from climate change and considers ways to mitigate these events proactively.

j. Neighborhoods, Housing, and Urban Conservation

The proposed text of Chapters IV and X support increased incorporation of equity in the support of Flagstaff's most vulnerable, a shared goal with the Neighborhoods, Housing and Urban Conservation chapter. Affordability, accessibility, and safety of all residents in Flagstaff is an important contribution to the climate action.

The proposed text amendments have considered the possibility of conflicts with nearly every goal and policy in the Flagstaff Regional Plan 2030 and have demonstrated that the proposed amendments are in substantial conformance to the plan.

B. Finding #2

To meet the finding the proposed amendment must be determined not to be detrimental to the public interest, health, safety, convenience, or welfare of the City of Flagstaff (the "City"), and will add to the public good as described in the General Plan.

The applicant has identified the following Community Benefits and Public Good:

- Reinforcement the connections between climate action and the vision of the Regional Plan,
- Increased transparency,
- incorporating stronger environmental features and benefits into land use planning and developments,
- Stronger rationale to lower air pollution, a wider range of options and more support for healthy and inexpensive modes of travel, better connections and more diversity and attainability in neighborhoods, increased energy efficiency in homes and buildings, and reduced waste,
- Increased emphasis on equity and activity to support the resilience of Flagstaff's vulnerable community members.

Planning and Development Service staff concurs with these findings of community benefits.

IV. Citizen Participation

Public hearings before the Planning and Zoning Commission and City Council are conducted in conjunction with requests for a Major Plan Amendment. In accordance with Arizona State Statute, The Planning and Zoning Commission must conduct 2 public hearings in two different locations within the jurisdiction. Notice of the public hearing was provided by placing an ad in the Arizona Daily Sun, posting notices on the property, and mailing a notice to everyone on the list of interested parties. City Council must approve a major plan amendment with a two-thirds majority vote.

City staff conducted a 60 day comment period which notified all the parties and government agencies listed in ARS 9.461, and any person or entity that requests in writing to receive a review copy of the proposal. During the 60 day public review, staff conducted 3 open houses (2 virtual and one in person) and posted a topic on the Flagstaff Community Forum.

All comments received during the 60 day public review are documented in the Public Participation Report (attached).

RECOMMENDATION:

Staff believes that the proposed Major Plan Amendment is in substantial conformance with the required findings and recommends the Planning & Zoning Commission forward the request to the City Council with a recommendation approval.

Attachments:

Major Plan Amendment Application
Regional Plan Text Revisions
Narrative
Impact Analyses
Citizen Participation Plan
Public Participation Report
Mailing lists (2)
Waiver of Submittal Requirements