



City of Flagstaff  
Community Development  
Site Plan Review Comments

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**Project Name:** ARC Flagstaff  
**Project No.:** PZ-20-00164-06  
**Project Address:** 7000 N. Highway 89

**Date:** September 13, 2022

**Application Type:** Site Plan  
**Review Type:** Substantive  
**Review Number:** 2

**Project Manager:** Genevieve Pearthree  
**E-mail:** gpearthree@flagstaffaz.gov  
**Phone:** 928-213-2603

**Status of Review:** Approved with Conditions

The Inter-Division Staff (IDS) Review has approved the Site Plan application subject to the conditions and comments listed below. This correspondence is transmitted to the applicant on day 20 of the 52-day Substantive Review Period in accordance with ARS 9-835(J). The next step in the development review process is to apply for a Conditional Use Permit. Please submit all application materials electronically to Becky Cardiff at bcardiff@flagstaffaz.gov. The CUP submittal should include a copy of this Site Plan Review Comments Letter along with your responses to each comment, in addition to all required application materials and plans.

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**Project Summary:**

American Rehab Campuses LLC proposes to develop a mental behavioral health and substance abuse treatment campus at 7000 N. Highway 89. The site consists of two parcels, the larger of which was located outside of the Flagstaff City limits and was subject to a concurrent Annexation request (PZ-20-00164-03), which City Council approved on May 17, 2022 (Ordinance No. 2022-01). The zoning on both parcels is Highway Commercial (HC) with a Resource Protection Overlay (RPO), which the exception of 1.09-acre portion on the northeast corner of the site that has Rural Residential (RR) zoning (on May 17, 2022 City Council also approved a concurrent rezoning request—PZ-20-00164-04—to allow for the development of an equine therapy area [Ordinance No. 2022-02]). The applicant proposes to divide the site into four (4) separate parcels. Parcels 1 and 2 will consist of the rehab campus, which is the focus of this Site Plan application. The proposed use, Custodial Care (a sub-category of Institutional Residential), is permitted in the HC Zone. Parcels 3 and 4 are proposed to be future commercial (currently shown as restaurant pads, which are permitted in the HC Zone). The entire site is subject to a Development Agreement (Approved on May 17, 2022; Resolution 2022-22).

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**CONDITIONS/COMMENTS:**

**Current Planning:**

Second Review, **Approved with Conditions**, 9/13/22  
Genevieve Pearthree, Senior Planner

Conditions of Approval



## City of Flagstaff Community Development Site Plan Review Comments

Please address the following comments as part of your Conditional Use Permit application.

1. Site Planning Design Standards ([10-30.60](#))
  - a. [10-30.60.090](#): Open Spaces, Civic Spaces and Outdoor Public Spaces
    - i. Add features in each civic space area to make these areas count as civic space. Civic Space may include the following: a landscape oasis area as defined in Section 10-50.60.050.C., Oasis Allowance, structures providing protection from the weather, benches, tables, or other pedestrian friendly features.
2. Landscaping Standards ([10-50.60](#))
  - a. Required landscaping quantities
    - i. Peripheral buffer
      1. The 15' landscape buffer along the north property line (next to APNs 301-50-005B/H) requires 1 tree, 2 shrubs, and 2 groundcovers minimum for every 25 linear ft. Each length of property line needs to meet landscaping standards. The following landscaping is required along each property line that requires a 15' landscape buffer.
        - a. 235.22-ft section: 9 trees, 18 shrubs, 18 groundcovers.
        - b. 166.15-ft. section: 7 trees, 14 shrubs, 14 groundcovers. Since a PUE is adjacent to part of this property line, some trees may be substituted for 2 shrubs per tree in the area where trees can't be planted.
        - c. 173.32-ft. section: 7 trees, 14 shrubs, 14 groundcovers. However, there are 4 existing trees with a DBH of 10-18 inches, which provide 8 tree credits. So, no new landscaping is required along this property line.
      - ii. Parking lot islands require 2 trees, 2 shrubs, and 2 groundcovers each. Provide this in the parking lot islands in front of the front of the RTC Womens and Mens buildings.
      - iii. Building Foundation Landscaping
        1. The RTC Womens and Mens buildings are shown to have slightly different linear feet, but the building elevations and floor plans indicate they are they same building. Please clarify and update landscaping calculations if needed.
    - b. Other comments
      - i. Please correct the native vs. naturalized classification for the following species.
        1. Butterfly Bush should be naturalized, not native.
        2. Hawthorn should be naturalized, not native. Update the size at planting to be at least 6' tall or 2" caliper.
      - ii. Make the plant symbols the same size in the landscaping plan and the plant list.
      - iii. Make the landscape plan larger so that all the symbols, particularly the shrub and groundcover symbols, are larger so that the number of each species can be verified.
  3. Stable/equestrian area
    - a. Provide the material and LRV of the stable roof.
    - b. State and show how you will be meeting the requirements in City Code section [6-03-001-0003](#) KEEPING OF LIVESTOCK (focus on subsection C: Rules and Restrictions – Large Livestock).
      - i. City Code requires at least 10,000 sq. ft. of pasture for each large livestock animal (this area must be fenced). If you do not have 40,000 sq. ft. minimum of pasture area, then you will need to reduce the number of stalls in the barn to no more than the allowed number of horses.
      - ii. Add a fence around the pasture area. Show, dimension, and provide the square footage of this area.



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- c. Resource Protection Standards (Table 10-50.90.100.A: Activities Allowed in Natural Resource Areas) prohibit fields, pastures, and livestock enclosures from natural resource areas. This means there cannot be any resource protection trees in the pasture area.
  - i. Update the Natural Resource Protection Plan if you intend to remove trees in pasture areas from resource protection calculations to accommodate a pasture area.
- d. Pasture and Open Space areas can overlap.

### General Comments

1. Fences and Screening ([10-50.50](#))
  - a. Any roof- or ground-mounted mechanical and electrical equipment must be screened from public view to the height of the tallest equipment or be enclosed in a building. The screening materials must be materials architecturally compatible with the finishes and character of the principal structures as shown in Figure 10-50.50.040B, Rooftop Equipment Screening.
  - b. Refuse and recycling containers shall be screened by solid fences or walls constructed to a minimum height of six feet and designed to match the building materials of the primary building on the site and the Engineering Standards.
  - c. Any new fences and walls less than 6 ft. high and that are not associated with the Building Permit for the warehouse shall require an approved Minor Improvement Permit prior to installation. Any fences or walls taller than 6 ft. tall shall require an approved Building Permit prior to installation.
2. Outdoor Lighting Standards ([10-50.70](#))
  - a. The proposed development is subject to the City of Flagstaff Outdoor Lighting Standards.
  - b. This project is in Lighting Zone 2, which permits a maximum of 50,000 lumens per acre (or 34,965 lumens per acre if using all LED or NSALED [Narrow-Spectrum Amber LED] luminaires).
  - c. No more than 10% of the total allowed lumens may be from non NSALED (Narrow Spectrum Amber LED) or non-LPS (Low Pressure Sodium) luminaires.
  - d. No more than 11% of the total allowed lumens may be partially-shielded. No unshielded lumens are allowed.
  - e. The applicant shall apply for an Outdoor Lighting Permit with Building Permit submittal, and shall have an approved Permit prior to installing new, or modifying existing, outdoor lighting.
3. Sign Standards ([10-50.100](#))
  - a. All signage shall comply with the requirements of this section.
  - b. The applicant shall obtain a Permanent Sign Permit prior to installing any permanent signage.
  - c. If any electrical work needs to be done to the freestanding sign, you will also need to acquire an Over-The-Counter Electrical Permit.

### Future Submittal Requirements/Process

1. Conditional Use Permit for the equestrian area
2. Civil Plans
  - a. Provide details for bike racks and any civic space amenities. Bike rack standards are available here: [Appendix 1.4: Bicycle Parking Space Design Requirements](#).
3. Final Plat
  - a. Staff recommends recording CC&Rs and/or a shared parking and access agreement with the plat to address shared maintenance, parking, access, trash, and other issues.
4. Building Permit



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- a. Provide details showing windows will be recessed per the Architectural Design Standards.
- b. Submit Outdoor Lighting Permit (OLP) concurrently or prior to BP submittal (OLP must approved before BPs can be issued, and electrical plans in BP plans must match the approved OLP).
5. Permanent Sign Permit (if applicable)
6. Minor Improvement Permit (if applicable, for any walls/fences or accessory structures not covered under a Building Permit)

### **Building & Safety:**

First Review, **Approved with Conditions**, 6/9/22

Victoria St. Clair, Building Plans Examiner

### **Conditions of Approval**

1. The annexation of parcel(s) from Coconino County to City of Flagstaff and/or lot modifications (combinations or splits) must be completed prior to application of building permits.
2. A separate Commercial Building Permit is required for each building proposed. The services of an Arizona Registered Design Professional is required. Standard building permit submittal requirements can be obtained from the Community Development front counter at Flagstaff City Hall or on the City of Flagstaff website. <https://www.flagstaff.az.gov/494/Building-Safety>.
3. A Commercial Building Permit, separate from the proposed buildings) is required for any retaining walls exceeding four feet in height measured from bottom of footing to top of wall. More information will be provided during Engineering/Civil plan Review.

### **General Comments**

1. City of Flagstaff Building Safety reserves the right to make additional comments during actual plan submittal and review of building permit applications.

### **Future Submittal Requirements**

1. None

### **Engineering:**

Second Review, **Approved with Conditions**, 9/12/22

David Millis, Development Engineering Project Manager

### **Conditions of Approval**

1. Relocation of overhead lines will require undergrounding or approval of an undergrounding waiver by the City Engineer.
2. All-weather access to be provided (meeting Engineering Standard requirements FUTS standard) to all sewer manhole and water main appurtenance locations.
3. All 89 frontage improvements are subject to ADOT approval. Documentation of ADOT encroachment permit will be required prior to issuance of any City of Flagstaff permit.
4. ALTA indicates gas and power easements along east property boundary. Applicant will be responsible to ensure that these pre-existing easements will not preclude the required water/sewer easements at Civil Plan Review.

### **General Comments**



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1. None

Future Submittal Requirements

1. None

**Fire Prevention:**

First Review, **Approved with Conditions**, 6/9/22

Chris Jack, Fire Inspector

Conditions of Approval

1. Future submittals indicate riser rooms (riser room shall have exterior door for access and visible from fire apparatus access road.
2. Future submittal - provide fire line and FDC pipe, size material and length. An on-building FDC may be permitted on some of the buildings rather than remote. FDC's shall face fire apparatus roads and be within 100' of a hydrant.

General Comments

1. None

Future Submittal Requirements

1. None

**Public Works:**

First Review, **Approved**, 6/8/22

Samuel Beckett, Streets Section Director

**Stormwater:**

First Review, **Approved with Conditions**, 6/13/22

Douglas Slover, Project Manager

Conditions of Approval

1. Page 3 of the DIA states an extended detention basin will be utilized. The basin will essentially be a retention basin as there is likely no detention portion above the retention portion.
2. Page 5 of the project narrative also discusses extended detention basin. Replace the word detention with mitigation in the second and third sentences of the third paragraph of the Drainage/Stormwater section. Mitigation is not required for Basin B2. Mitigation is required for the other basins and is likely to be provided by a retention basin.
3. Page 1 of the PDR states the FRC development will retain the increase in volume and the retention facilities will be designed per COF LID manual. However, page 2, paragraph 3 states that detention volumes were determined. How are pre vs post volumes calculated?
4. Page 4 of the PDR has a section titled Detention/LID and again discusses detention volumes and extended detention basin. With option 2 from the DIA, there should be retention justification and a minor section regarding the peak flow mitigation outcome as a result of providing a pre vs post retention system.
5. Conclusion Section of the PDR, again discusses detention volumes for a pre vs post retention scenario.



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6. No discussion of emergency overflow was found in the PDR. Provide a blurb regarding all basins being able to convey an unmitigated, post development, 100-year peak flow through then as an emergency overflow when design is exceeded or components clog.
7. Impervious area summary on page 1 of the Site Plan set states Detention is required. LID is required. Peak flow mitigation is required. Pre vs post retention is required as selected in the DIA. Retention, draining in more than 24-hours but less than 36-hours should be less than the 10 year outfall but this should be checked/verified.
8. Mitigation basin outlet, SP01 or SP02, should show some erosion protection at pipe outlet. This can be designed in Civil design.
9. Mitigation basin, SP01 or SP02, should show emergency overflow. This can be designed in Civil design.
10. GD01 provides the retention volume of 44,868 cubic feet. To discharge this volume in more than 24 hours, the peak discharge would be near 1/2 cubic feet per second. As such, the basin is likely to be a retention basin with a bleed off. Consider this as a retention basin rather than an extended detention basin. The LID water quality volume will still be required to pass through the water quality component and as such we will raise the retention bleed off above the LID retention volume.

### General Comments

1. Basin is shown as an extended detention basin. This may end up being a retention basin. See prior comments.

### Future Submittal Requirements

1. If other Staff have return for correction comments and any of the above items are addressed with that resubmittal, please note on Comment Response Letter.
2. Provide operation manual with Civil Submittal
3. Provide Erosion Control Plan with Civil Submittal.

### Water Services:

First Review, **Approved with Conditions**, 6/9/22

Jackson Salazar, Water Services Plan Reviewer

### Conditions of Approval

1. Sewer services shall be at least 5' from outside of manhole, please show this separation on construction plans.
2. Please remove all valves along the water main next to tees for fire hydrants and fire lines unless needed for 500' spacing requirement on construction plans.

### General Comments

1. None

### Future Submittal Requirements

1. None

### Traffic:

First Review, **Approved**, 5/27/22

Reid Miller, Traffic Engineering Project Manager

### Conditions of Approval

1. None



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### General Comments

1. The TIA is still in review with A.D.O.T.

### Future Submittal Requirements

1. None

### **Housing:**

First Review, **Approved**, 6/1/22

Jennifer Mikelson, Housing Analyst

### **Parks:**

First Review, **Approved**, 6/13/22

Amy Hagin, Parks Manager

### **Sustainability**

First Review, **Approved**, 6/10/22

Jenny Neimann, Climate and Energy Specialist

### Conditions of Approval

1. None

### General Comments

1. The applicant is encouraged to construct energy-efficient, electric-only buildings, and to begin planning for ONLY electricity utility infrastructure on this site. This would allow the site to avoid adding or extending natural gas infrastructure - a potential source of significant cost savings for the developer. The developer may also save money by having only one energy utility (electric), and highly efficient appliances.

Energy-efficient, electric-only buildings are the buildings and homes of the future. In recent years, electric furnaces, heat pumps and water heating technologies have improved dramatically, making electric-only buildings feasible and often even preferred.

Electric-only buildings allow the development to eventually become a zero-emissions development, as the electric grid becomes a zero-emissions grid. APS has committed to an electric grid that produces net zero emissions by 2050 - meaning that new buildings that are all electric will gradually become lower-emissions buildings as the APS power supply becomes cleaner, eventually resulting in homes relying on 100% clean power in 2050. Installing natural gas infrastructure locks this development into consuming fossil fuels until a costly retrofit is made.

Forgoing natural gas also has health benefits, resulting in healthier indoor air for residents and employees. Gas appliances and heating devices generate a variety of air pollutants that have been linked to health risks.

If the applicant would like to discuss building electrification, feel free to contact us: Jenny Niemann, Climate Manager, at [JNiemann@flagstaffaz.gov](mailto:JNiemann@flagstaffaz.gov).

Industry studies have found that all-electric buildings save costs over mixed-fuel buildings. The following reports may be of interest:



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### a. ALL-ELECTRIC NEW HOMES & BUILDINGS IN COLORADO

A 2020-2021 BUILDER SURVEY OF COSTS, TECHNOLOGIES, AND TRENDS

<https://swenergy.org/pubs/colorado-buildings-20-21>

\*Note Colorado is used because of its similar climate zone to Flagstaff - the state is in climate zone 5 or higher (colder climates)

Findings:

- Benefits of all-electric homes include “lower asthma rates, no risk of carbon monoxide poisoning or explosions from gas leaks, and a much smaller carbon footprint compared to homes that use gas or propane for heating, hot water, and cooking. In addition, the all-electric home’s costs, comfort, and cooking performance can be the same or slightly better.
- Developers in Colorado are “planning and constructing larger, master-planned, all-electric communities in several parts of the state.”

### b. The New Economics of Electrifying Buildings

<https://rmi.org/insight/the-new-economics-of-electrifying-buildings/>

Findings:

- “In Denver, the all-electric home saves \$2,900 in net present costs and 12 tons of CO2 emissions over a 15-year period.”

2. The applicant is encouraged to consider the installation of solar panels (also known as photovoltaic, or PV panels), on available roof space. Larger roofs such as those on multi-building sites are some of Flagstaff’s best opportunities for the installation of solar infrastructure within city limits. The unobstructed southern viewsheds mean the buildings will have significant solar potential.

Solar can benefit developments in several ways, including resilience benefits, marketing benefits, and utility cost savings. Solar is now the cheapest electricity source in history, and the developer is encouraged to consider an investment in on-site energy production.

Tax incentives may be available. APS currently has programming that may be available to the applicant to support solar installation, and provide financial benefits. COF sustainability staff is happy to support the applicant in this process if desired -- feel free to contact us.

3. The applicant is encouraged to consider food waste collection and compost service in the design of the kitchen and waste management plan. Diverting food waste from the landfill can significantly reduce the greenhouse gas emissions of the establishment. Design of the building is the ideal time to consider three waste streams in the kitchen and/or food prep areas, which includes trash, recycling and food waste collection. Multiple compost collection businesses currently serve Flagstaff, with projected expansion in options in the coming years.

### Future Submittal Requirements

1. None

### Heritage Preservation/Community Design:

First Review, **Approved**, 6/13/22



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Mark Reavis, Neighborhood Planner – Heritage Preservation Officer

Conditions of Approval

1. Direct the excavation crew to avoid noted resource locations while providing crew training for any unanticipated archeological finds.

General Comments

1. None

Future Submittal Requirements

1. None

**Multimodal**

Second Review, **Approved with Conditions**, 9/12/22

Martin Ince, Multimodal Transportation Project Manager

Conditions of Approval

1. Verify that any new/revised locations for bike racks are reflected on the engineering drawings (they are currently shown on some, but not all drawings).

General Comments

1. None

Future Submittal Requirements

1. With civil plans, provide details for bike parking, including the type of rack to be used. Bike parking and bike racks must meet the standards in Zoning Code [Appendix 1.4](#): Bicycle Parking Space Design Requirements.