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November 2, 2023

*Via E-Mail: pstclair@flagstaffaz.gov*

Mr. Patrick St. Clair, Planner  
Community Development  
City of Flagstaff  
211 West Aspen Avenue  
Flagstaff, Arizona 86001

Re: Addendum to Minor Development Standard Modification Application (“Application”) for the +/- 10.56 acres located at the southeast corner of U.S. Route 66 and Alvan Clark Boulevard, also known as Coconino County Assessor Parcel Number 112-01-156.

Dear Patrick:

We represent Roers Companies (“Roers”) with respect to the development of Woody Mountain Apartments—a 221-unit affordable multi-family residential community on the approximate 10.56 acres located at the southeast corner of U.S. Route 66 and Alvan Clark Boulevard, also known as Coconino County Assessor Parcel Number 112-01-156 (“Site”). The Site is zoned High Density Residential, Resource Protection Overlay (HR—RPO). The purpose of this Addendum is to address the approval criteria in Section 10-30.20.040.B.4.c.i of the City’s Zoning Code (“Zoning Code”).

The Zoning Code authorizes the City Council to approve modifications to property development standards for certain affordable housing developments, subject to the City Council finding that various approval criteria have been met. The following sets forth the requirements and justification addressing that the development proposal satisfies the approval criteria:

**(a) The modifications are consistent with and conform to the goals of the General [Regional] Plan and any applicable specific plans;**

**Response:**

The *Growth Areas & Land Use* chapter of the Regional Plan guides the community vision for how land use within the City should occur. The *Growth Areas & Land Use* chapter is comprised of three concepts: (1) Growth, (2) Area Type, and (3) Place Type, which help to provide the framework around how Flagstaff should be built.

Growth: Future growth will be concentrated in reinvestment areas and will include a balance of infill and redevelopment in existing neighborhoods, as well as the development of “Greenfields” within the growth boundary.

This Application promotes the following Growth goals and polices of the Regional Plan:

Goal LU.2. Develop Flagstaff’s Greenfields in accordance with the Regional Plan and within the growth boundary.

Policy LU.2.1. Design new neighborhoods that embody the characteristics of Flagstaff’s favorite neighborhoods—that is, with a mix of uses, a variety of housing types and densities, public spaces, and greater connectivity with multimodal transportation options.

Policy LU.2.2. Design new development to coordinate with existing and future development, in an effort to preserve viewsheds, strengthen connectivity, and establish compatible and mutually supportive land uses.

Goal LU.6. Provide for a mix of land uses.

Policy LU.6.1. Consider a variety of housing types and employment options when planning new development and redevelopment projects.

Area Type: The Regional Plan designates the majority of the Site as Future Urban Area Type. Specifically, this portion of the Site is designated Future Urban Area Type, which contemplates smaller, mixed-use centers at intersections with adequate access, with access to surrounding neighborhoods, and with goods and services in proximity.

This Application promotes the following Future Urban Area Type goals and policies of the Regional Plan:

Goal LU.10. Increase the proportion of urban neighborhoods to achieve walkable, compact growth.

Policy LU.10.1. Prioritize connectivity within all urban neighborhoods and activity centers.

Policy LU.10.9. Civic spaces must be well designed, accessible, and central to the urban fabric.

The remainder of the Site along the Alvan Clark Boulevard frontage is designated Suburban—Future area type. This area type area is intended to have moderate densities of people, residences, jobs and activities, and the area is drivable to access homes, jobs, services, and goods.

This Application promotes the following Area Type goal and policies of the Regional Plan:

Goal LU.13. Increase the variety of housing options and expand opportunities for employment and neighborhood shopping within all suburban neighborhoods.

Policy LU.13.4. Plan suburban development to include a variety of housing options.

Policy LU.13.11. Promote cluster development as an alternative development pattern in appropriate locations as a means of preserving resources and to minimize service and utility costs.

Place Type: Flagstaff has various activity centers. The Site is located within an Urban Activity Center – Neighborhood Scale (U7). Urban Activity Centers typically hold the greatest densities of housing.

This Application promotes the following Place Type goal and policies of the Regional Plan:

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

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.18.4. Encourage developers to provide activity centers and corridors with housing of various types and price points, especially attached and multi-family housing.

Policy LU.18.6. Support increased densities within activity centers and corridors.

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 context and scale.

Policy LU.18.13. Promote higher density development in targeted areas where economically viable and desired by the public.

Policy LU.18.14. Endorse efficiency of infrastructure with compact development within targeted activity centers.

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The *Community Character* chapter of the Regional Plan provides guidance as to the design of the community and built environment. As stated above, with the exception of the sliver of frontage along Alvan Clark Boulevard, the Site is designated as an Urban Activity Center (U7). Community Character is the combination of qualities and assets that establish the City’s unique sense of place and promotes a high quality of life for its residents and visitors. The *Community Character* chapter of the Regional Plan is comprised of various subsections, including: Gateways, Corridors, & Communities, Community Design, and Streetscapes and Transportation Systems.

Gateways, Corridors, & Communities: The Regional Plan recognizes that Gateways provide the first impression people have as they enter the region, and thus warrant special design considerations to reflect community pride and local design traditions. The City has gateway points, corridors, and communities, all of which require attention to give the desired impression to those entering and leaving. The Regional Plan designates U.S. Route 66, which immediately bounds the Site to the north, as a “Gateway Corridor.” The development of transportation corridors, such as U.S. Route 66, is one of the main ways of not only creating connectivity but creating a memorable, unique experience. “Great Streets” are vital components of the character of the City.

The development proposal recognizes its importance being located adjacent to U.S. Route 66 as it enters the City from the west. As such, the project has been strategically designed to be building-forward helping to create a more urban “feel” along the U.S. Route 66 streetscape.

Community Design: The physical character of the City is defined by its built environment and natural setting. Places recognized in Flagstaff, the remarkable places, are those areas where the patterns of development are preserved, restored, and enhanced, and emulate the design traditions of the built environment and the natural setting. Fundamental components of community design can include new development that is contextually appropriate. The design of neighborhoods, landscape, urban spaces, streetscape and transportation systems, infrastructure, site design, parking, and architecture all contribute to the overall character of the community.

Understanding and promoting the different desired characteristics of urban, suburban, and rural neighborhoods and activity centers as reflections of the surrounding natural landscape is important in maintaining the diverse community desired by residents and visitors. Promoting and maintaining concentrated development in activity centers is one means of preserving optimal open space throughout the community.

This Application promotes the following Community Design goals and policies of the Regional Plan:

Goal CC.3. Preserve, restore, enhance, and reflect the design traditions of Flagstaff in all public and private development efforts.

Policy CC.3.3. Emulate the most celebrated design traditions of Flagstaff, particularly the pre-Route 66 and early Route 66 eras.

- Goal CC.4. Design and develop all projects to be contextually sensitive, to enhance a positive image and identity for the region.
  - Policy CC.4.1. Design streetscapes to be context sensitive and transportation systems to reflect the desired land use while balancing the needs of all modes for traffic safety and construction and maintenance costs.
  - Policy CC.4.3. Employ design solutions that balance the interface of the natural and built environments, with the most urbanized core activity areas being the most built, and the most rural areas being the most natural.
  - Policy CC.4.5. Encourage local landscaping using Xeriscape, low-impact principles, and native vegetation wherever possible.
  - Policy CC.4.6. Use landscaping to benefit the environment and improve aesthetics, in order to maximize the economic benefit that a well landscaped community provides.

Streetscapes and Transportation Systems: Although roads and streets are used primarily to move vehicles, bicycles, and people from one place to another, they can also frame the region’s amazing views. Streetscapes play an important part in creating “Great Streets.” Designing and constructing “complete streets” that enable safe access for all users, including pedestrians, bicyclists, motorists, and transit riders of all ages and abilities, can provide a memorable experience for visitors and residents alike. As part of the Timber Sky master-planned community, the U.S. Route 66 frontage adjoining the Site is improved—this project proposes no changes to the U.S. Route 66 streetscape.

This Application promotes the following Streetscape and Transportation Systems goal and policies of the Regional Plan:

- Goal CC.4. Design and develop all projects to be contextually sensitive, to enhance a positive image and identity for the region.
  - Policy CC.4.1. Design streetscapes to be context sensitive and transportation systems to reflect the desired land use while balancing the needs of all modes for traffic safety and construction and maintenance costs.
  - Policy CC.4.4. Design streets and parking lots to balance automobile facilities, recognize human-scale and pedestrian needs, and accentuate the surrounding environment.

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The *Neighborhoods, Housing & Urban Conservation* chapter of the Regional Plan recognizes that neighborhoods are the backbone of every community. An important part of the Regional Plan is to address housing options available to current City residents, as well as look to the future to make sure that the right housing options are available. This project specifically recognizes the need for housing diversity and stock, that affordable housing is critical in ensuring community sustainability and economic development.

This Application promotes the following *Neighborhoods, Housing & Urban Conservation* goal and policies of the Regional Plan:

Goal NH.3. Make available a variety of housing types at different price points, to provide housing opportunity for all economic sectors.

Policy NH.3.1. Provide a variety of housing types throughout the City and region, including purchase and rental options, to expand the choices available to the meet the finance and lifestyles needs of our diverse population.

Policy NH.3.3. Increase availability of affordable housing for very low-income persons, through innovative and effective funding mechanisms.

Policy NH.3.5. Encourage and incentive affordable housing.

Goal NH.4. All housing is safe and sanitary.

Policy NH.4.3. Ensure compliance with fair housing laws.

**(b) Will not be detrimental to the public interest, health, safety, convenience, or welfare of the City and will add to the public good as described in the Regional Plan;**

**Response:** The improvement of the Site will not be detrimental to the public interest, health, safety, convenience, or welfare of the City and will add to the public good as contemplated in the Regional Plan, so long as it is developed in accordance with City codes and ordinances, including receiving approval of this Application. As stated above, the development of the Site with 221-new, affordable housing units is supported by the Regional Plan and is beneficial to the community, City, and overall public good.

**(c) Will not endanger, jeopardize, or otherwise constitute a hazard to the property or improvements in the vicinity in which the property is located;**

**Response:** The improvement of the Site will not endanger, jeopardize, or otherwise constitute a hazard to the Site or improvements in the vicinity of the area. Plans will be submitted to the City (planning, engineering, building, fire, traffic, etc.) for review against codes and ordinances (Zoning Code, Engineering Design Standards, Building Code, Fire Code, etc.) to ensure proper and orderly development.

**(d) Is consistent with the character of the area; and**

**Response:** To facilitate the larger community plan of, “all types of housing for all economic levels,” Roers is proposing to develop a 221-unit affordable multi-family residential community. This Application further builds out the Timber Sky master-planned community, further contributing to an accessible, athletic, outdoor community comprised of 1, 2, and 3-bedroom units oriented around a centrally located, expansive amenity and open space area. This project adds an attainable rental residence to the Timber Sky master plan.

Woody Mountain Apartments represents an opportunity for diversification of housing choices within the Timber Sky master-planned community and the City. This unique parcel of land positively contributes to Timber Sky’s goal of creating communities of places people love, making them widely available, and creating diverse economic communities. Woody Mountain Apartments will expand the attainability for Flagstaff residents, while offering further housing choices for those desirous of calling Timber Sky home.

True community must include all economic levels to be diverse—Woody Mountain Apartments will allow individuals to enjoy the lifestyle of Timber Sky before they may be able to purchase a home in Timber Sky. This Application is consistent with the character and overall vision of the Timber Sky community.

**(e) In addition, the type, quality, and amenities of the development are consistent with those found in similar developments that are available to the public at market rate.**

**Response:** The type, quality, and amenities of the development are consistent with those found in similar developments that are available to the public at market rate. Resident amenities include a centrally located, expansive park & playground area, in addition to a lawn area for active and passive uses, including recreation & play and social interaction & gathering. A dog run is planned near the southwest corner of the project. Finally, a network of planned pedestrian paths provides safe, convenient, and efficient connectivity throughout the development connecting residents from their units to the various on-site amenities.

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Should you have any questions or require additional information, please do not hesitate to contact me at **(602) 256-4471** or **lschube@gblaw.com**. Thank you, again.

Sincerely,

GAMMAGE & BURNHAM

A handwritten signature in black ink that reads "LCSchube". The letters are cursive and somewhat stylized.

By

Lindsay C. Schube

cc: Michelle McNulty  
Alexandra Pucciarelli  
Sara Dechter

LCS/nas