

Flagstaff Community Sustainability Commission  
City of Flagstaff

To: The Flagstaff Regional Plan Committee  
Re: Input to the 2045 Flagstaff Regional Plan  
From: Flagstaff Sustainability Commission  
Date: December 12, 2024

Dear [Recipient's Name/Committee],

On behalf of the Sustainability Commission, we commend the tremendous effort and dedication invested in the development of the 2045 Regional Plan. This ambitious and comprehensive document reflects countless hours of work by thoughtful individuals committed to the success and well-being of our community. Recognizing that the plan remains a work in progress, we submit this letter and accompanying materials in the hope of contributing to its refinement.

To provide meaningful input, the Sustainability Commission formed an informal working group to conduct an in-depth review of the plan, focusing on elements most relevant to sustainability. Discussions among the full commission highlighted how intricately Flagstaff's future is tied to the plan as a whole. Accordingly, our feedback is both detailed and wide-ranging.

One key concern is the insufficient emphasis on climate change—an existential threat to our mountain habitat and community's quality of life. While the plan references the Carbon Neutrality Plan (CNP), these connections appear as peripheral mentions rather than foundational elements. Climate resilience and carbon neutrality must be central pillars of the Regional Plan, reflecting the same urgency and priority that underlie the CNP.

We do not propose rewriting the CNP into the Regional Plan; instead, we recommend integrating the spirit of urgency and purpose embodied in the CNP throughout the plan. For example, the plan could include strategies that align land use and development decisions with climate science and best practices from other forward-thinking communities. Specific measures, such as incentivizing developers to adopt sustainable materials and practices, would tangibly mitigate the impacts of traditional building methods.

The Regional Plan is a framework for guiding Flagstaff's growth and development, therefore is a critical tool for climate action. By prioritizing climate action and resilience, it has the potential to shape a sustainable and forward-looking future for our entire community.

The attached materials, prepared collaboratively by the Sustainability Commission and the City of Flagstaff's Sustainability Office, reflect our respect for your efforts and our shared commitment to Flagstaff's long-term success. Thank you for the opportunity to contribute to this important endeavor. We remain available to provide further clarification or collaborate with your team as you continue refining the plan.

Sincerely,

Chair Amy Wolkowinsky, Vice Chair Mary Metzger, Elijah Born, Cameron Carlson, Tom Lammie,  
Rodger Scurlock

## Sustainability Commission

The Commission may be contacted through staff liaison, Tia Hatton, at [tia.hatton@flagstaffaz.gov](mailto:tia.hatton@flagstaffaz.gov)

### Sustainability Commission – Regional Plan 2045 Comments – For Consideration

#### Overarching Comments:

1. General comments on language and layout
  - a. In general, the Plan is a hard document to use and navigate. It employs a lot of planning jargon, which makes it hard to understand. Much of the detail seems unnecessary – it seems that things can be moved to an appendix.
  - b. There is a lot of background information about Flagstaff in the first chapter. We suggest trimming it down, to better focus on the most important information about the plan purpose, scope, priorities, etc.
    - i. Suggest restructuring the first two chapters for better flow, background info, existing plans, etc. Possibly: split chapter 1 and chapter 2 into subsections: 1: city/region background, climate background (Provide goals of CNP, how they will be incorporated in this plan) 2: plan/planning background, structure of plan; Move “The Focus of the Regional Plan” section from 1-10 and 1-11 to be the intro/guidance section of chapter 3. [BACKGROUND INFO (region, culture, community, climate)-> STRUCTURE OF PLAN -> FOCUS/PRIORITIES/GOALS/POLICIES]
  - c. Many of the map text is small and hard to read. There are also inconsistencies in the map legends.
  - d. Many of the photos are blurry, making them less appealing, and they take up a lot of space. Many pictures are not relevant to the subject.
  - e. Can we please have actual page numbers, in addition to chapter page numbers? They will make the plan a lot easier to navigate?
2. Equity
  - a. Equity is not explicitly defined nor is it discussed in priorities, goals and policies, although it is implied when talking about housing affordability, mitigating displacement, and transportation costs. This is a huge gap - equity should be defined and explicitly referenced throughout the plan, especially with respect to the priorities and goals and policies, but also the implementation guidelines and action items. If we're not building equity into our policies, then we are furthering inequitable systems. It feels disjointed that it's a theme but not a priority.
  - b. The Plan employs language of vulnerability, which can be problematic if emphasizes deficiencies rather than strengths, and focuses on deficits at the individual level, because it fails to hold the systems accountable that perpetuate inequity throughout the Flagstaff community. We suggest replacing language of vulnerability with more inclusive, people-first language. This document is really helpful: [Style-Guide-for-Inclusive-Language\\_Dec-2017.pdf](#).
3. Scope and Purpose of the Plan
  - a. A stronger introduction that describes the purpose and scope of the plan, and how it can specifically impact Flagstaff's growth and development patterns, is necessary to setting the stage for why the RP 2045 is important. It is not clear how code will be impacted by this plan.

- b. Information about what the Plan IS, and IS NOT, and what is in scope, and what is not, is difficult to find and be more clearly described. Elevating it with bold text and a header, and placing it in a prominent location in the document would help.
4. Plan Vision and Priorities
- a. This plan does not set a clear vision, nor a clear path for getting us there.
  - b. The Vision for the Flagstaff Region on page 1-1 is vague and does not seem very useful as an overarching guide for the vision of the community. Also, how does the vision relate to the priorities? Are the priorities intended to help achieve the vision? If yes, then they need to be more strongly connected. Right now, the language in the priorities feels very detached from what is in the vision and it is not clear how they connect.
  - c. The Plan Priorities on page 1-11 should be the overarching guidelines for where the plan wants to go. However, they are buried in the introduction and their relationship to the vision, themes, goals and policies is unclear. The Plan would be a lot stronger if the purpose of the Priorities was clearly stated. We suggest adding a header to this section and adding clarifying text that describes the importance and role of the priorities and their relationships to other parts of the plan.
  - d. Each of the Plan priorities is critical, and should be described in a clearer way.
  - e. There are several important themes that are absent from the Priorities, including Economic Vitality, Health, Quality of Life, and likely others. People will seek to see how their values are represented. Will they see themselves reflected in the current list of Priorities? If people don't see their values represented, we risk alienation if we don't help people see themselves in these priorities.
    - i. Sustainability should be tied to each of these themes; more clarity here could help to better explain how Sustainability relates to land use, and topics throughout the document. The priorities would be more well-rounded if they discussed economic vitality, quality of life and health, such as part of supporting a thriving, resilient community. Further, these are things that climate change threaten, and climate action can support, but are much more compelling than emissions and climate. Economics and health could actually be combined with the current sentence about our preparedness and resilience because they are linked. A more comprehensive priority could be: "Improve economic vibrancy, climate resilience and community health."
5. Objectives
- a. The first paragraph on page 1-11 mentions the Regional Plan's objectives, but the objectives aren't actually stated or clarified. Are the priorities actually the objectives? If not, what are the objectives? Making them easy to find and understand will clarify the purpose of the Plan and make it a lot stronger.
6. Themes
- a. What is the purpose of the themes and how were they selected? How do they connect to the priorities? We suggest connecting them directly to the priorities (have 1 theme per priority), that then show up throughout the plan, not just in the Goals and Policies chapter. That way, the community and staff can more clearly see how the goals, policies, and action items help advance the priorities.
  - b. Switch Community Character to Community Identity. Identity is an important pillar of resilience and is more fitting than character. Community identity, is the foundation of community resilience, fostering a strong sense of belonging, pride,

and collective responsibility that strengthens social bonds and empowers residents to adapt to challenges.

- i. The intention of this is not to take away from responsible development – rather, to encourage development that aligns with the community identity and supports responsible growth.

## 7. Goals and Policies

### a. General feedback

- i. Suggest clarifying which goals and policies apply to the review of rezonings and other development cases (one development at a time) versus which goals and policies are more programmatic and budgetary and apply to the larger community vision.
- ii. Make the goals and policies more succinct and focused, while maintaining the spirit of each goal/policy. Currently, they are very long and there are many concepts in each goal or policy, makes them difficult to implement, especially if the intent is to review them against specific developments.

## 8. Climate Action

- a. Climate action (mitigation, adaptation/resilience, equity, justice) should be core values/priorities in the introduction, since they all relate to land use.
- b. Climate action is discussed in most, if not all, of the chapters, but it is buried and dispersed, which weakens it. Since the city has declared a Climate Emergency, it makes sense to have one climate change chapter that includes all of the goals, policies, and information related to climate change mitigation, adaptation, and equity will clarify and strengthen climate action in the Plan.
  - i. Further, all of the climate action goals and policies are in the Energy chapter, but there are many climate action goals that are outside of energy, suggesting that climate action is only energy related. All the more reason to have a standalone climate chapter, which could cover the following:
    11. Why climate/sustainability is important to the community (climate threats)
    12. History, including the Climate Emergency Declaration and Carbon Neutrality Plan
    13. Identify mitigation, adaptation, and equity themes
- c. Carbon dioxide removal is almost absent from the plan even though it is hugely important to climate change mitigation (it is buried in chapter 7). It should be in the goals and policies because it is important to land-use.
- d. In addition to adding a climate chapter, any content in the other chapters related to climate change should be highlighted that climate action is integrated within other policies using icons, logos, breakout boxes, sub-sections, etc. This should happen whether or not it has already been detailed. It should be clear and easy to find how the main themes of each chapter relate to climate change.

## 9. Write stronger climate goals and policies

- a. Explain how land use is a climate action tool, it is one of many tools.
- b. Goal CA.1: Achieve and maintain carbon neutrality for the City by reducing emissions from all sectors.

- i. The decision by the Regional Plan to remove the 2030 date lessens the sense of urgency on the community’s path to carbon neutrality. Further, the current Regional Plan carbon neutrality goal is stronger because it has the 2030 date: “Achieve carbon neutrality for the City by 2030 by reducing emissions from all sectors.” The date should be added back in.
      - ii. The Commission suggests the following language: “Achieve and maintain carbon neutrality for the City by 2030 by reducing emissions from all sectors.”
    - c. Add additional policies to support the carbon neutrality goal:
      - i. Policy CA.7: Reduce climate pollution through City Code updates and programs that require developments and redevelopments over a certain size to account for the projected GHG emissions and choose from a suite of enhanced development options to reduce emissions, conserve resources, use sustainable materials, and enhance resilience to climate change.
      - ii.
    - d. Add a CDR GOAL: Deploy large and small-scale CDR initiatives to reduce GHG emissions across the region.
      - i. Ensure that the CDR goal is connected to the CNP.
      - ii. Policy suggestion: Remove barriers to CDR as primary and secondary land use. Policy suggestion: Invest in large scale CDR projects to achieve the goals of the Carbon Neutrality Plan.
      - iii. Are there other policies we should add to increase deployment of CDR across the region?
    - e. Ensure that any other policies that related to CDR, reference the CNP.
10. Goal E – Increase the Region’s use of renewable energy sources while planning for the infrastructure needed to support an expanding and evolving electric grid.
- a. Align energy policy with carbon neutrality plan.
11. Add language and clear support for the following where appropriate within Chapter 3 Goals and Policies:
- a. Remove Mandatory Parking Minimums
    - i. Eliminate minimum parking requirements and focus on shared parking solutions to reduce car dependency, enhance land use efficiency, and promote sustainable transportation options.
  - b. Underutilized Parking Lot Conversions
    - i. Encourage the conversion of oversized and underutilized parking lots into multi-use developments with residential units, shops, and community spaces to promote higher-density, walkable neighborhoods. Prioritize designs that integrate green infrastructure, public transit access, and sustainable building practices to reduce car dependency, enhance community livability, and support climate resilience.

- c. Sustainable and Equitable Active Transportation
  - i. Reduce car dependency and subsidies for car infrastructure by prioritizing a multimodal transportation network with fare-free transit, micro-mobility options, and active transportation infrastructure. This will promote sustainable mobility, improve equitable access, and support climate resilience in Flagstaff.
- d. Clean Rail Infrastructure
  - i. To support Flagstaff's sustainability and climate resilience goals, prioritize the adoption of clean rail technologies, the integration of passenger rail with public transit systems, and the development of sustainable freight infrastructure. This approach will reduce emissions, improve community mobility, and promote green jobs, while minimizing and mitigating negative community impacts and fostering a low-carbon, resilient transportation network.
- e. Nature Based Solutions and Green Infrastructure
  - i. Implement nature-based solutions such as green infrastructure, riparian restoration (including expanding floodplains and creating urban greenways), and urban forests in (re-)development projects to improve stormwater management, enhance biodiversity, and increase climate resilience, benefiting both the environment and community health.
- f. Water Quality on Emerging Contaminants
  - i. Address emerging water pollutants such as microplastics, PFAS, and phthalates, by conducting studies and implementing proactive treatment solutions to safeguard water quality, improve stormwater management, and protect public health.
- g. Climate Justice Integration (under equity or climate action)
  - i. Integrate climate justice into all planning processes, ensuring that vulnerable and under-resourced communities have equitable access to climate resilience resources and sustainable development opportunities to reduce disparities and enhance social equity.
- h. Climate Resilient Housing
  - i. Ensure new and affordable housing is climate-resilient by incorporating energy efficiency, renewable energy, fire and flood mitigation measures, supporting long-term sustainability and protecting vulnerable communities from climate impacts.
- i. Healthy Regenerative Economy
  - 1. Promote green jobs in clean energy, sustainable construction, and green technologies, fostering a resilient, circular, and regenerative economy that supports innovative businesses and helps Flagstaff transition to a low-carbon, sustainable future.