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April 21, 2025

VIA E-MAIL

Sara Dechter, AICP
Comprehensive Planning Manager
City of Flagstaff
211 West Aspen Avenue
Flagstaff, AZ 86001

Re: Little America Hotel - Flagstaff Comments to Proposed Flagstaff Regional Plan
Retreat Agenda for May 2, 2025

Dear Sara:

On behalf of Little America Hotel - Flagstaff, owner and operator of the 247-room resort located at 2515 East Butler Avenue (the "Resort"), we respectfully submit the following comments regarding the draft Flagstaff Regional Plan 2045 (the "Plan") and request consideration by the City Council to add discussion and consideration of the proposed modifications to the Flagstaff Regional Land Use Plan 2045 Regional Plan Retreat ("Retreat") Agenda for May 2, 2025 at a timeslot/topic area most appropriate for such dialog.

According to the currently posed City Council meeting agenda for the Work Session on April 22, 2025, agenda Item 10 is review of the draft agenda for the Retreat. As you are aware, there have been a number of comments provided by the Resort regarding the Plan.

In our letter of December 19, 2024, there was a request to make a modification to (i) the Future Grown Illustration to expand the "Suburban Corridor" designation per the exhibit provided, (ii) to modify the Existing and Future Arterials and Collectors Maps as shown, (iii) to remove defined locations of the FUTS through the Resort property on the Flagstaff Urban Trails Map, and (iv) to clarify language in the Future Desired Density/Intensity provisions of the Table of Zoning Compatibility. Please see Attachment A.

In our letter of March 6, 2025, regarding the Regional Plan Committee Agenda, the above concerns were restated and two (2) additional comments to specific agenda items, one being density minimums not applying to mixed-use development that does not include residential uses

Sara Dechter, AICP
April 21, 2025
Page 2

and that secondly the Suburban Neighborhood-Medium Density classification changes proposed to High Density (with corresponding higher minimum residential density and a loss of single-family zoning districts) not be made to the Resort. At this point we proposed an alternative of a Resort specific planning tool, such as an overlay or other designation to ensure flexible long-term land use planning and implementation for the Resort (Attachment B).

It is our understanding that some of the requested modifications have (or will be) made to the Plan. However, the request for a flexible planning tool more appropriate to a large non-residentially focused property has not yet been provided.

The Resort would like to propose such a tool. Attachment C proposes addition to the Plan of a new “Regional Hospitality” classification. This would not be mapped, but rather qualified for by meeting specific criteria (such as size in acres, a 200 room resort hotel as well as unified ownership). Once defined as such a classification, the developer would provide area wide conceptual plans to address project phasing, proposed trail network and circulation to be updated as each portion of the area develops. This will ensure orderly development while avoiding a need to amend any of the applicable maps in the Plan that proprot to show a future trail or other feature on the Resort property.

This classification would also require that a rezoning proposal be generally compliant with the Future Land Use Category as to a majority of the final assigned zoning categories, zoning districts and other features. It waives strict conformance to specific density minimums and specific prescriptive elements as to the “Plan Conformance” finding. This allows for an application for rezoning to be reviewed and processed with the Regional Plan being informative but avoiding the unintended consequences of a hard number that might conflict with a part of a proposal.

For example, a rezoning request for 100 acres that included 10 acres of R1 that happens to be in the Suburban Corridor area (where R1 is not allowed by the Table) could be found to be in Plan Conformance using the generally compliant finding due to the nature of the remaining 90 acres. This flexibility is important to the future development of the Resort over time, and with growth occurring all around the property, now is the time for adopting flexible long range planning tools for this unique property that is important to the economic health of the City.

We look forward to the dialog at the Retreat and appreciate your attention to this request.

Respectfully submitted,

Snell & Wilmer



Noel J. Griemsmann AICP
Sr Urban Planner

cc: Michelle McNulty, Planning Director

Attachment A

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December 19, 2024

VIA E-MAIL

Sara Dechter, AICP
Comprehensive Planning Manager
City of Flagstaff
211 West Aspen Avenue
Flagstaff, AZ 86001

Re: Little America Hotel - Flagstaff Comments to Proposed Flagstaff Regional Plan
2045 60-Day Public Review Draft

Dear Sara:

On behalf of Little America Hotel - Flagstaff, owner and operator of the 247 room resort located at 2515 East Butler Avenue (the “Resort”), I am pleased to provide the following comments and suggestions on the Proposed Flagstaff Regional Plan 2045 (the “Plan”).

For context on the comments below, it is important to note that the Resort has been in operation in Flagstaff for over 50 years and owns approximately 536 acres of land south of Interstate 40. The Resort is currently undergoing a significant master planning effort to establish its long term vision for an expansion of its hotel operations and supportive facilities, with a goal of becoming destination resort that offers unparalleled experiences for the users of its accommodations and amenities. This focus is on the northern portions of the Resort property, with the area south of the existing campus the subject of internal visioning process to establish its best future use. As these efforts are still in their early phases, it is critical for the future success of the Resort that development flexibility be maintained as to the future boundaries between the hotel/resort functions and the remaining land, as well as the types of uses permitted.

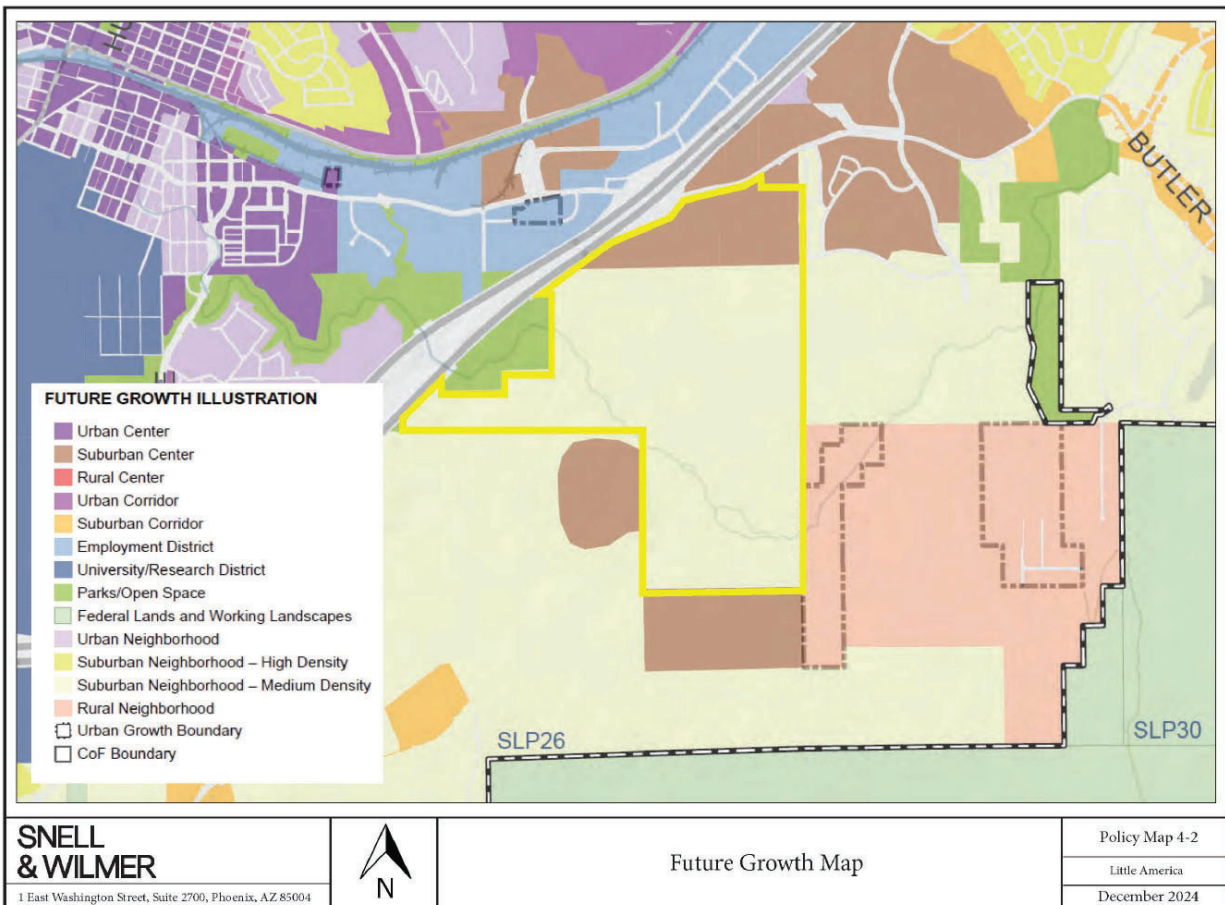
While it is understood that the Plan is a policy tool and non-regulatory, it is best for the community at large, as well as for the Resort, to ensure that the Plan reflects the flexibility that would support future, more detailed planning and entitlement efforts without the need to seek future amendments to the Plan, barring a significant change in direction for either the Resort or the City at large.

Sara Dechter, AICP
 December 19, 2024
 Page 2

These comments are provided in that spirit of cooperation and the goal of establishing a planning framework that will support the Resort’s current and future operations.

Comment #1: Future Growth Illustration Pages 4-7 and 4-8

The current draft of the Plan delineates the Resort as “Suburban Center” (north quarter) and “Suburban Neighborhood Medium Density” (south three quarters):



The Suburban Center designation is intended for a mixed-use environment, described by the Plan as having “*a medium-to-high intensity of people, residences, jobs, and activities. The area is walkable, and a variety of services and goods are available. Arterial and collector streets and sidewalks are well connected and support all transportation modes. Separated paths for active transportation are commonly found midblock. The area is walkable, and a variety of services and goods is available. Transit-supportive development is desired.*”

Then the criteria expand on this stated vision:

Suburban Centers should:

Support developments such as horizontal and vertical mixed-use, multistory, large commercial, office, multifamily, and residential.

Encourage residential uses co-located with commercial uses within mixed-use developments.

Connect bike and pedestrian infrastructure across the block and not solely around the block edges.

Encourage transit-supportive development.

Use shared parking, managed parking, and cross property access to create efficient parking and circulation that serves multiple properties whenever possible.

Develop backage roads and retrofitted street connections using commercial local or collector systems to create access for businesses and mixed-use areas.

Consider employment and compatible industrial land uses.

Provide connectivity to open spaces and parks within a quarter to one-third of a mile walking distance.

Prioritize capital and utility investments to support infill, attainable housing, transit, and walkability.

The above criteria conflict with the Resort's unique operational characteristics and large "one-owner" land holding (unlike other areas where ownership is bifurcated amongst many properties). For example, the Resort would not have a likely development scenario where there would be "large commercial, office, multifamily, and residential" uses in a mixed-use environment nor any "co-located" residential uses.

Furthermore, this area is unlikely to include a more intensive mixed-use environment, it will be focused on current automotive oriented uses (highway traveler services) and of course the Resort itself. Even if mixed use or residential development was proposed, this land use category calls for more than 29 du/ac, a very intense level of residential use that would be out of context with the form of existing and likely future Resort development.

A better fit with likely development scenarios is the "Suburban Corridor" category, which is defined as being: "composed of parcels with direct access to arterials and collectors that serve large capacities of people and vehicles for commercial purposes outside of Centers. More intense land uses and pedestrian safety are a priority in this setting. A variety of services and uses meet the daily needs of residents in nearby neighborhoods and the Region."

Sara Dechter, AICP
December 19, 2024
Page 4

The criteria for this land use category better describe current context and likely future development patterns:

Suburban Corridors should:

Encourage multifamily residential uses located above and behind commercial uses.

Increase the variety of housing types where only commercial is present.

Develop high-quality pedestrian, bicycle, and transit facilities on or parallel to them.

Provide off-street pedestrian and bicycle facilities at regular intervals to connect with nearby neighborhoods and other residential developments.

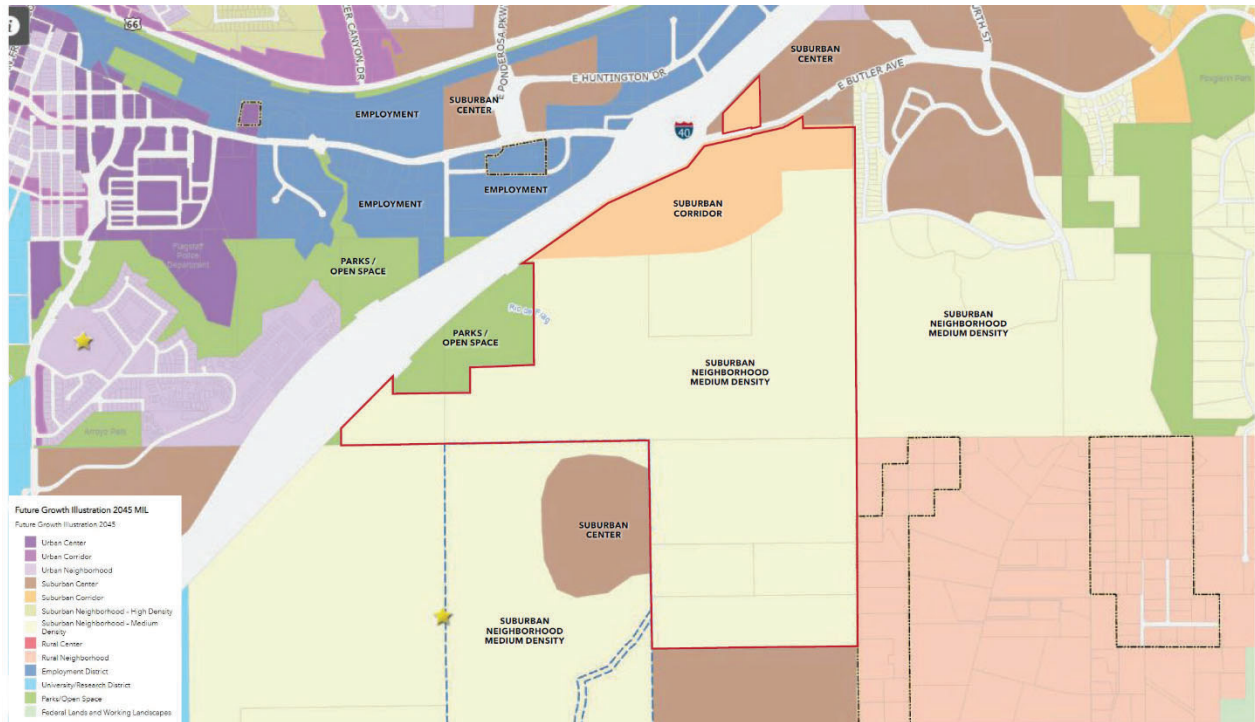
Allow for automotive-oriented uses and drive-throughs.

The current development along Butler Avenue includes more automotive and highway supportive uses, including fuel sales, truck parking and repair, operated by Little America. These uses existing uses are those types of “automotive-oriented uses” that are allowed by this land use category and may be a feature of future development efforts.

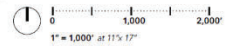
Additionally, if/when including residential in a project, this land use category supports a 20 duac or higher density, more appropriate to the scale of existing and likely development in this area, which is more suburban in scale, plus taller/denser structures would impact the Resort’s surrounding context, which is an important consideration with long-range planning efforts for the Resort and its immediate neighbors.

Furthermore, the Resort master planning doesn’t cleanly fit on the current parcel lines. A more flexible zone for future Resort development is appropriate, more along the lines of the image below:

See Following Page



Regional Plan 2045 | Future Growth Illustration - Proposed Revision



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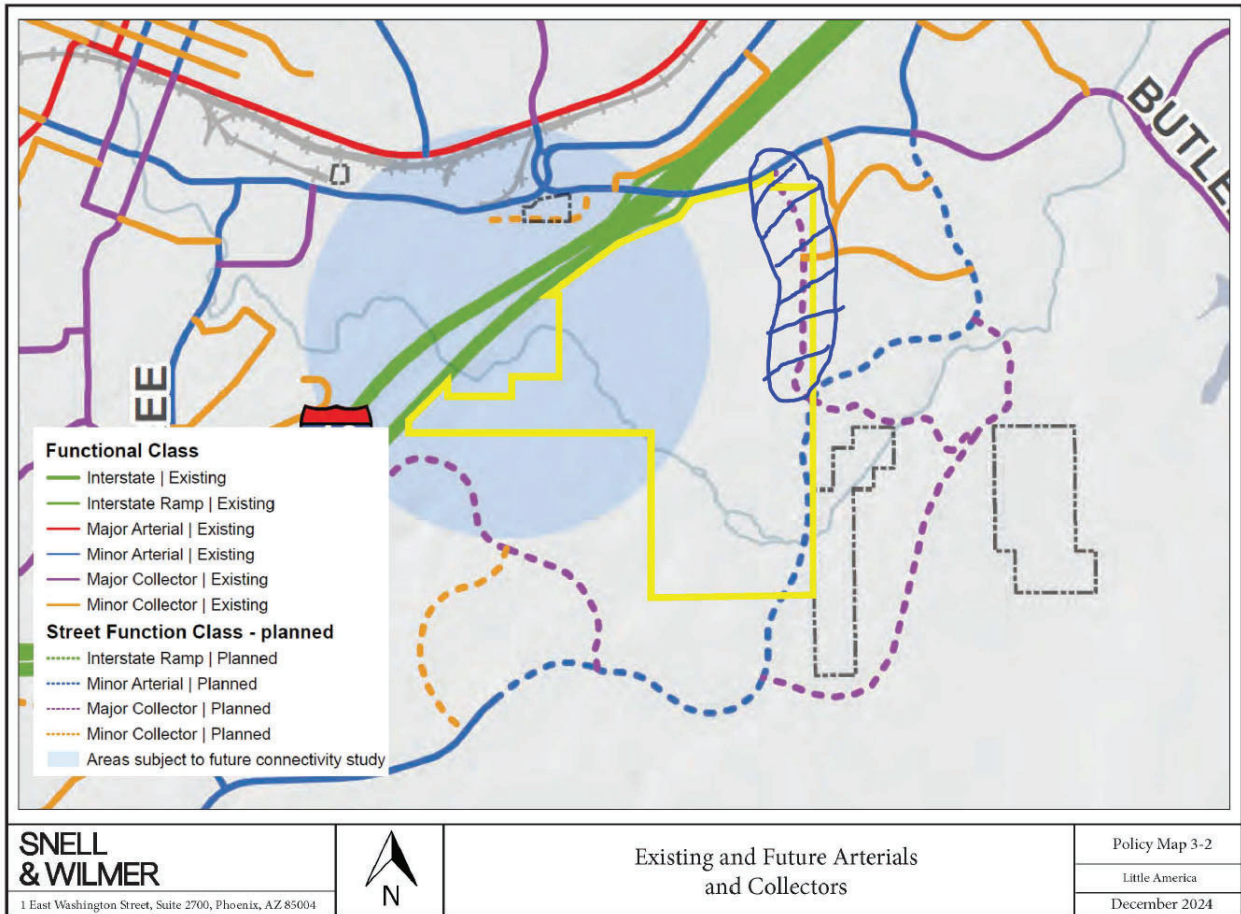
In summary, the Resort would request a change from the “Suburban Center” land use category to the “Suburban Corridor” land use category, along with an expansion of the area in a manner similar to the image above, to “fit” future Resort master planning efforts.

Comment #2: Existing and Future Arterials and Collectors Maps Pages 3-5 and 3-6

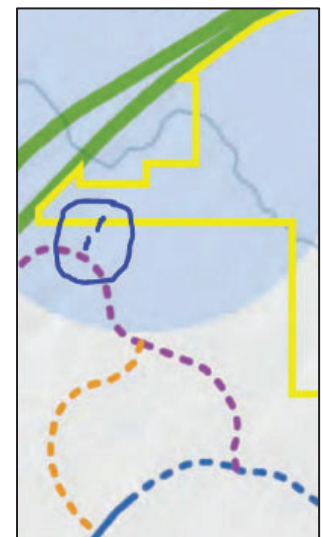
The proposed Existing and Futures Arterials and Collectors Map, Policy Map 3-2, shows a north/south major collector roadway along the eastern edge of the Resort property connecting Butler Avenue and the future John Westly Powell Boulevard. The roadway network in this area does not need this north/south connection with the construction of John Westly Powell Boulevard and would severely impact Resort master planning. If, after a more detailed traffic study indicates such a route would be needed to support future Resort development, such an alignment could be proposed. However, at this time, this roadway should not be planned for.

Sara Dechter, AICP
 December 19, 2024
 Page 6

The Resort would request that this map be amended to remove this north/south route.

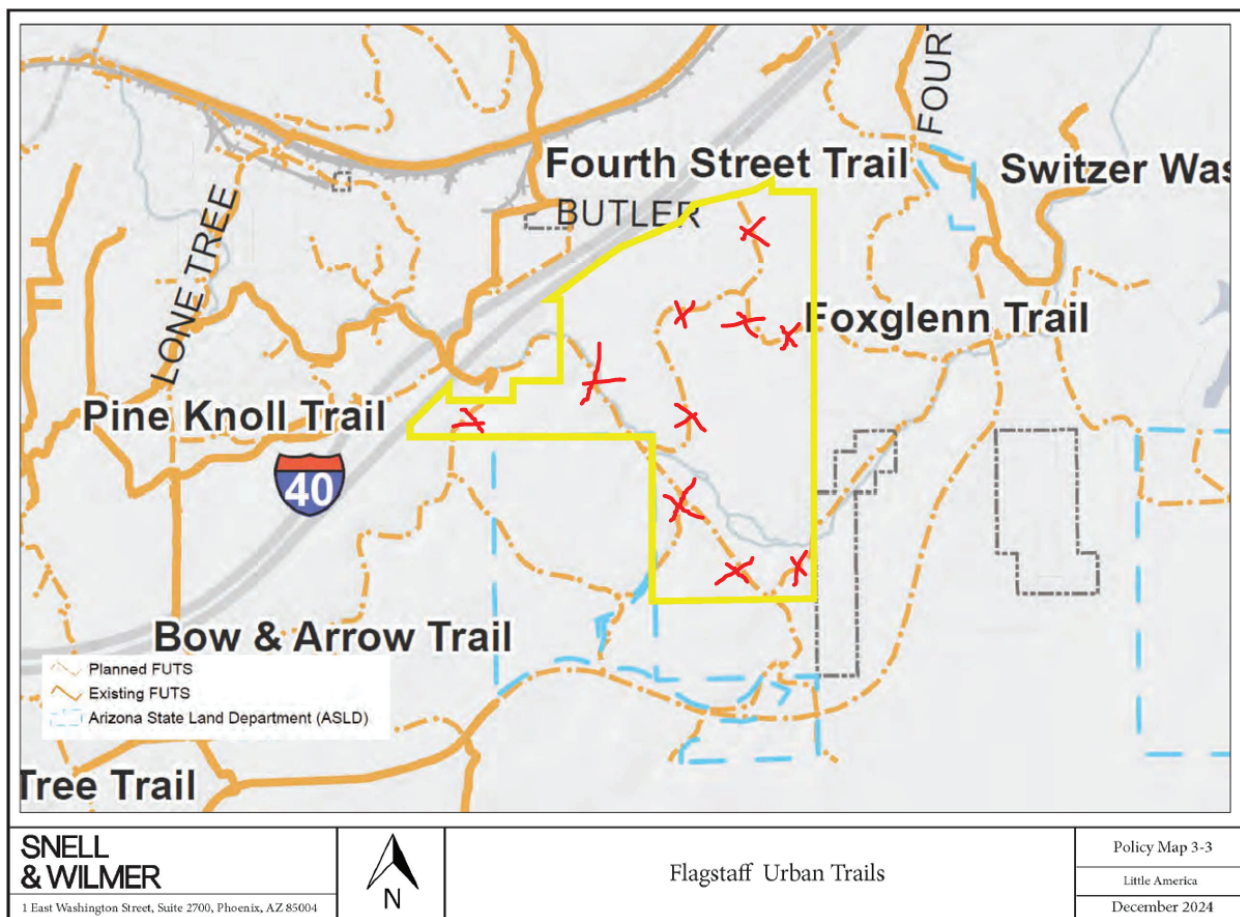


In addition, the west side of the property will likely require collector service to support future development without attempting to cross the Rio de Flag (impactful both from an environmental as well as cost perspective). Resort ownership has been engaged with this abutting property owner on concepts to create a roadway corridor to service this area in the future. Additional support for such a connection in the Plan would be helpful policy as this area is planned out by both parties.



Comment #3: Flagstaff Urban Trails Map Pages 3-7

The Resort recognizes the importance of public railway connections such as the Flagstaff Urban Trail (“FUTS”) system. However, such pathways require more detailed study of topography, connection points, roadway crossings and of course the location of future land uses and development. Because the Resort’s master planning process is not yet complete, there is not sufficient information to provide a proposed location for a future FUTS trail around or through the property.



The Resort requests that this map be updated to simply delete these lines, with the understanding that more detailed planning will be performed with future development efforts.

Sara Dechter, AICP
 December 19, 2024
 Page 8

In addition, the map includes a disclaimer related to State Trust Lands:

Depiction of planned trails on State Trust Land do not constitute final location of or legal access to trails unless a legal trail easement is obtained from ASLD. In the absence of a legal trail easement, any recreational use of State Trust Land requires that individuals and/or groups obtain a Recreation Permit. Permits can be acquired through ASLD's online portal at <https://asld.secure.force.com/recreationalpermit/>. Please note that certain State Trust Lands may be closed to some or all recreational activities, such as camping or campfires.

Given that the Plan includes both existing and proposed trails, it is requested that this disclaimer be broadened to provide clarity to readers that any “proposed” trails are not yet trails and are not to be utilized as such.

More specifically, the Resort would propose the addition of text similar to the following on the FUTS Plan to address this issue:

Depiction of planned trails on private property do not constitute final location of or legal access to trails. Until a “Planned FUTS” route is finalized and appropriately dedicated for public use, any such route shown herein is for planning purposes only and it is noted that any public use of private land without permission is trespassing.

With the removal of the proposed FUTS network over the Resort, and the inclusion of the disclaimer above, the Resort can master plan the correct location for the FUTS connections around its property and any readers of the Plan will be on notice that any shown future routes are simply that, planned routes, and not lawful trail routes.

Comment #4: Future Desired Density/Intensity Provisions of the Table of Zoning Compatibility of Each Land Use Category Pages 4-28 and 4-29

The table provides for a description of each future growth illustration category (such as Suburban Corridor), as well as the compatible zoning categories for each. There is a bit of ambiguity in the “Future Desired Density/Intensity” column.

For example, the “Centers” are listed as “More that X duac” such as Suburban Center at 29 or more:

Future Growth Illustration Category	Future Desired Density/ Intensity (duac) ⁷	Existing Compatible Zoning Categories (City) ⁸	Existing Compatible Zoning Categories (County)
CENTERS			
Urban Center (UC)	More than 50 duac	CB, CC, HC, NCC, HR, PF	NA
Suburban Center (SC)	More than 29 duac	HC, CC, NCC, HR, PF, RD	NA
Rural Center (RC)	More than 7 duac	SC, CS, NCC, HR, MR, PF, POS	CG-10,000, CH-10,000, CN, PC, PRD, PS, RM-10/A, RM-20/A, RS-6,000

Sara Dechter, AICP
 December 19, 2024
 Page 9

However, in the Commercial Districts type, that language changes to “More than X duac, when residential or mixed use in proposed”:

COMMERCIAL DISTRICTS			
Urban Corridor (UCC)	More than 29 duac, when residential or mixed use is proposed	CC, CS, HC, NCC, PF, HR	NA
Suburban Corridor (SCC)	More than 20 duac, when residential or mixed use is proposed	SC, CC, CS, HC, NCC, PF, HR	NA

It could be inferred that there is a purposeful distinction between these types, with Centers requiring X duac, while Commercial Districts only subject to X duac if developing as residential or mixed use.

For the Resort, there will not likely be any dwelling units with the expansion of the resort proper. Two concerns. First, if the Suburban Center classification is retained contrary to the Resort’s request (see Comment #1), the current text appears to require a minimum of 29 duac in any development type (as the qualifiers are not included). This does not seem to be the intent, however, the language does infer such an interpretation.

Second concern is under the Resort’s preferred Suburban Corridor classification. While no residential units are contemplated, the Resort is a type of mixed-use environment with hotel rooms, restaurant facilities and convention space. Additional clarification is desired to ensure that there is not an expectation of future Resort expansion efforts to be required to include residential units due to the Resort being deemed a “mixed-use” environment.

The Resort would propose a minor clarifying addition to this table:

Add a footnote to “Future Desired Density/Intensity” as #10 to note that:

“Desired Density is only applicable to those projects that include residential dwelling units.”

This would clarify that non-residential development is allowed and encouraged by the Plan, and that mixed-use (which includes residential) or residential only projects would need to meet the density targeted by this table.

Sara Dechter, AICP
December 19, 2024
Page 10

On behalf of the Resort, with these above modifications, the Plan would be more accommodating to their future master planning and long-term investment in the Flagstaff community. I am happy to set up a meeting to discuss the above further.

Thank you for your consideration of these comments.

Respectfully submitted,

Snell & Wilmer

A handwritten signature in blue ink, appearing to read 'Noel J. Griemsmann', is positioned above the printed name.

Noel J. Griemsmann AICP
Sr Urban Planner

cc: Michelle McNulty, Planning Director

Attachment B

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March 6, 2025

VIA E-MAIL

Sara Dechter, AICP
Comprehensive Planning Manager
City of Flagstaff
211 West Aspen Avenue
Flagstaff, AZ 86001

Re: Little America Hotel - Flagstaff Comments to Proposed Flagstaff Regional Plan
2045 Modifications Proposed in the Regional Plan Committee Agenda for
March 6, 2025

Dear Sara:

On behalf of Little America Hotel - Flagstaff, owner and operator of the 247-room resort located at 2515 East Butler Avenue (the "Resort"), I am pleased to provide the following comments and suggestions regarding the City staff proposed modifications to the draft Flagstaff Regional Plan 2045 (the "Plan") that is agendized for discussion by the Regional Plan Committee ("Committee").

For context on the comments below, it is important to note that the Resort has been in operation in Flagstaff for over 50 years and owns approximately 536 acres of land south of Interstate 40. The Resort is currently undergoing a significant master planning effort to establish its long-term vision for an expansion of its hotel operations and supportive facilities, with a goal of becoming a destination resort that offers unparalleled experiences for the users of its accommodations and amenities. This focus is on the northern portions of the Resort property, with the area south of the existing campus the subject of an internal visioning process to establish its best future use.

As these efforts are still in their early phases, it is critical for the future success of the Resort that development flexibility be maintained as to the future boundaries between the hotel/resort functions and the remaining land, as well as the types of uses permitted.

Sara Dechter, AICP
March 6, 2025
Page 2

While it is understood that the Plan is a policy tool and non-regulatory, it is best for the community at large, as well as for the Resort, to ensure that the Plan reflects the flexibility that would support future, more detailed planning and entitlement efforts without the need to seek future amendments to the Plan, barring a significant change in direction for either the Resort or the City at large. These comments are provided in that spirit of cooperation and the goal of establishing a planning framework that will support the Resort's current and future operations.

I do want to start with summarizing the four (4) primary comments from the Resort that were raised in my letter of December 19, 2024 and have been discussed with you and the City team. We have requested the following:

1. With respect to the Future Growth Illustrations (Pages 4-7 & 4-8) we request that the northern portion Resort property (see Exhibit A) be classified as the "Suburban Corridor" future land use category rather than "Suburban Center" to better align with current and likely future development of the Resort property.
2. Please modify the Existing and Future Arterials and Collectors Map (Pages 3-5 & 3-6) (i) to widen the proposed "areas subject to future connective study" bubble to the south and east to illustrate that, in order to minimize crossings of the Rio de Flag, abutting property connections to/from the western portion of the Resort property may be required after more detailed analysis and (ii) to remove the north/south "minor arterial" identified as "planned" along the western edge of the Resort property.
3. Please remove the "Planned FUTS" lines on the Existing and Planned Flagstaff Urban Trails Map (Page 3-7) and replace them with text noting (i) that the future FUTS at the Resort property is subject to future detailed planning and, (ii) in the event any trails are shown in the final Plan, proper notes are added making it clear to the reader that any such "future" trails are for planning purposes only and not open/established or otherwise lawful to utilize.
4. Clarifications to the Future Desired Density/Intensity column of the Table of Zoning Compatibly for Each Land Use Category (Pages 4-28 & 4-29). The current language requires that any "residential" development be at a target density but also implies that "mixed-use" development also be at said density level, which in the case of Suburban Corridor is more than 20 du/acre. As "mixed-use" is not a defined term in the Plan, potentially any Resort development requiring a zoning amendment that includes more than one land use would trigger a requirement to include dwelling units. Please provide clarifying language that non-residential "mixed-use" is not required to include residential uses of any density.

Sara Dechter, AICP
March 6, 2025
Page 3

On the above items, we are waiting upon the updated maps, graphics and text and will continue to work with you and your team on acceptable content that will support the Resort and its long-term planning options.

This letter is focused on bringing to your and the Committee's attention additional comments on the Plan that we identified in the agenda for the Committee. More specifically, this letter provides comments on the following two (2) items before the Committee.

A. Agenda Item 9.a Density Calculations in the Plan. On this item, the density concern regarding mixed-use projects that do not include residential uses (noted above as Item 4) appears to be being addressed via a proposal to except out "commercial or industrial parcels" from density calculations.

The Resort is supportive of such exception so long as it is applicable to non-residential mixed-use as well, and would like to see final text that makes it very clear to future readers of the Plan that residential minimums do not apply to projects that do not include residential uses to ensure that any future non-residential mixed-use development is deemed in conformance with the "Table of Zoning Compatibly for Each Land Use Category" and other provisions of the Plan.

It is important that there is no ambiguity in the use of the term mixed-use as to the commercial or industrial exception to density minimums.

B. Agenda Item 9.b Changes to Suburban Neighborhood Category. As to this item, the staff memorandum proposes modifying all "Suburban Neighborhood" identified properties to a "Suburban Neighborhoods-High Density" classification.

Most of the Resort property is identified as "Suburban Neighborhood-Medium Density" in the current draft of the Plan. A move from Medium to High density will modify the lowest permissible density from 2 du/acre to 7 du/acre, a 250% increase in base density. With 536 acres, likely to be master planned (and noting some will be in the Suburban Corridor category not factored into the following numbers), the Resort would have to provide 3,752 dwelling units in a future development proposal to meet this base standard (vs 1,072 at 2 du/ac). For comparison, today's zoning permits only 536 (1 du/ac).

This designation change would also remove the option to zone some of the property to a Single-Family Residential or Neighborhood zoning district, removing a key land use option from the site. The Resort requests that their property retain the "Suburban Neighborhood-Medium Density" designation as currently proposed by the Plan or alternative text be provided to retain the ability to have as low as 2 du/acre and the option to utilize single-family zoning if/as desired in future master planning efforts for the Resort property.

An option that we would suggest is for the Committee to provide a recommendation to City staff to establish a more Resort specific planning tool, such as a unique future land use

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Sara Dechter, AICP

March 6, 2025

Page 4

category or an overlay note on the Future Growth Illustration (“Map”) that would be on the Resort property that would refer back to some specific allowances that would address the unique nature of the Resort, its operations, future flexibility required as well as avoiding conflict with planning efforts for the remainder of the community.

For example, a “Resort” designation on the Map that then refers to a subsection of the Future Land Use Categories section (pages 4-9 to 4-27) which could contain more Resort related items that would not apply City-wide.

It is important that the final Plan be accommodating to the Resort’s future master planning and supportive of their long-term investment in the Flagstaff community. As always, the Resort is open to how their comments and concerns are incorporated into the final Plan and we look forward to working with you as the final draft Plan is prepared for the 60-day public review process.

Thank you for your consideration of these comments.

Respectfully submitted,

Snell & Wilmer

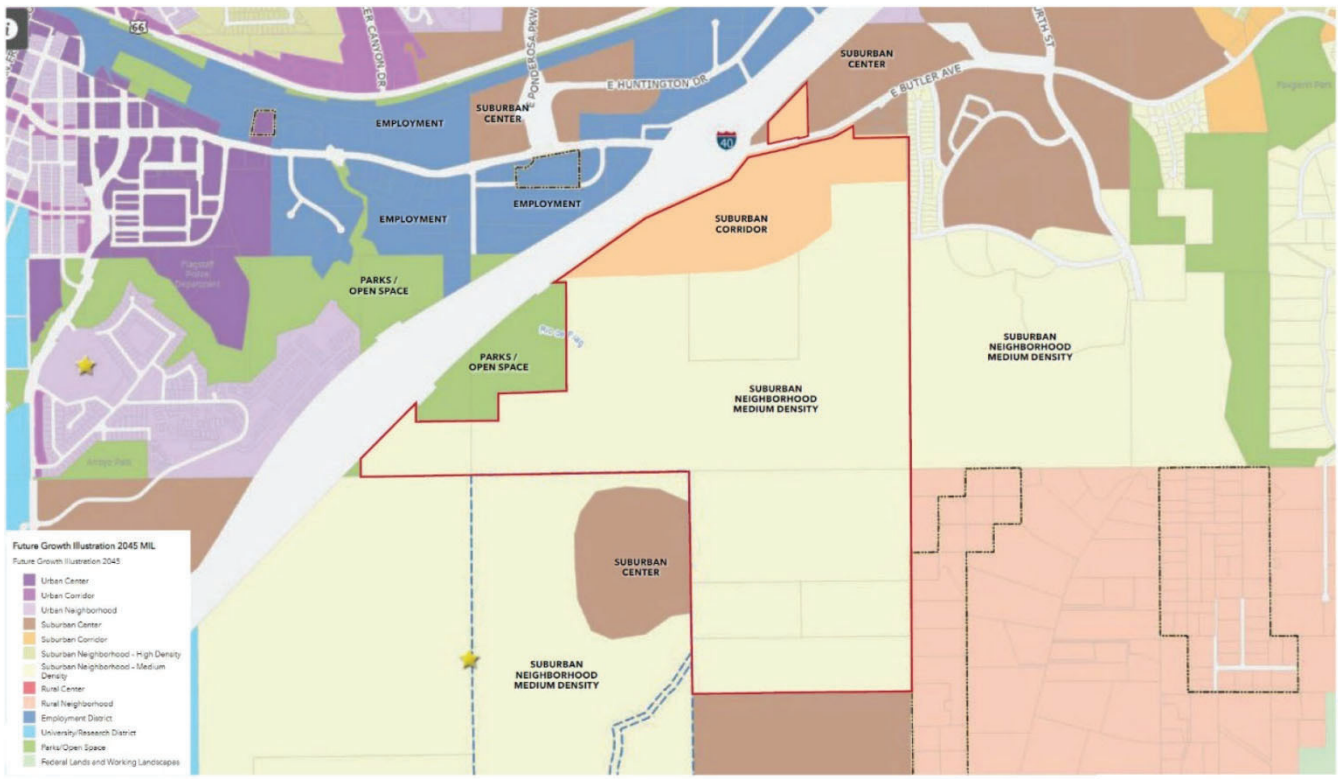


Noel J. Griemsmann AICP
Sr Urban Planner

cc: Michelle McNulty, Planning Director

Sara Dechter, AICP
March 6, 2025
Page 5

Exhibit A – Resort Future Land Use Requested Classifications



Regional Plan 2045 | Future Growth Illustration - Proposed Revision

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Attachment C

BUILDING BLOCK: DISTRICTS

There are two types of districts: Commercial and Employment. Districts have less mixed use than Centers but allow for a variety of uses to support the District's purpose.

Commercial Districts

Corridors

Corridors are a linear area of properties outside of or connecting Centers that have frontage on major roads, emphasize commercial development, and support high-density residential. Auto-oriented commercial uses are more typical in these areas and improvements to safe, convenient bicycle and pedestrian infrastructure and transit facilities are important. The land uses, characteristics, and densities of these areas support residential and commercial development at densities and intensities that are high enough to support transit.

Neighborhood Commercial

Neighborhood Commercial is intended to provide commercial opportunities, gathering places, and services generally convenient to residents. These areas are a subcategory of Urban and Suburban Neighborhoods. They are envisioned as a few adjacent parcels and are not mapped on the Future Growth Illustration. Their location may be identified as part of new development proposals, in neighborhood plans, or in a city-wide effort.

For more information see the [Building Blocks: Neighborhood](#) section.

INSERT NEW TEXT HERE

Regional Hospitality

Regional Hospitality provides for areas within the City where large and flexible master planning of hospitality focused development is required due to the unique nature of such sites, including unified ownership of the properties, the need to implement, over time, development of such areas in a unified way while maintaining long-term flexibility such sites require. Due to the large scale of such areas (400+ acres) and the significant flexibility required for more detailed planning of site-specific development, these types of properties will need to generally comply with the identified underlying Future Land Use Category (Center, Corridor, Neighborhood or other) as to a majority of the final assigned zoning categories, character descriptions and policies. To ensure flexibility over time, conformance to any detailed specifications such as density minimums or maximums, future proposed features maps (such as roadways, trails or other facilities) or similar prescriptive elements of this plan are not applicable when making a determination and/or finding of plan conformance. While not mapped on the Future Growth Illustration, such areas will be identified, so long as they meet the criteria for designation (see Glossary), by the developer as part of a new development proposal requiring a rezoning approval or may be identified by the City as part of a Specific Plan or other city-wide planning effort.

END NEW TEXT HERE

Addition Two:

GLOSSARY

Terms

NEW TEXT FOLLOWS:

Regional Hospitality – Areas within the City limits that are (i) at least 400 contiguous acres in total size, (ii) are controlled by one master developer or ownership entity at the time of designation, (iii) include a resort hotel of no less than 200 rooms, and (iv) provide, with any rezoning application, the following conceptual master plans to the City for the entirety of the Regional Hospitality area:

- a. Conceptual Phasing Plan. Identifying phases of development.
- b. Conceptual Trails Plan. Identifying likely routes for trails, with an emphasis on connecting identified trail linkages where trails are planned to abut the development area edge per Policy Map 3-3, FUTS Plan.
- c. Conceptual Circulation Plan. Identifying proposed locations of the primary interior roadway network and bikeway plan for the development area.

Once designated, as development occurs within the Regional Hospitality area, the above conceptual plans will be updated with each subsequent phase of development until build-out is reached. Such requirement will be included in the rezoning approval. When rezoning, these areas may include use of the Traditional Neighborhood Community Plan, as well as Transect and Non-Transect zones of the City of Flagstaff Zoning Code.