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## Comment for Flagstaff Regional Land Use 2045 Plan

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From Myles Schrag <mylesschrag@yahoo.com>

Date Mon 9/22/2025 10:00 PM

To Regional Plan 45 Comments <RegionalPlan45Comments@flagstaffaz.gov>

To those working on the Flagstaff Regional Land Use 2045 Plan:

Thank you for the important work you do in ensuring our city and region continue to maintain their special character in the years to come. I recognize it requires balancing many perspectives, which is not an easy task.

My goal in this short space is simply to ask that you prioritize preserving and building on what makes Flagstaff fundamentally unique as a destination for residents and visitors. This seems like an obvious goal to have, and yet it can get forgotten in practice as opportunities and challenges arise—especially if planning documents such as the Flagstaff Regional Land Use Plan 2045 don't provide clear guidance.

Specifically, I'm referring to ensuring Flagstaff's inevitable growth occurs responsibly, so that developers are incentivized to improve our community rather than the other way around. Flagstaff's parks, urban trail system, and open spaces are a massive draw. They are consistently praised in quality-of-life discussions I have with other residents. Many of us live here because we understand that value; we're immensely proud of it. Any development that occurs should not compromise that natural connection, and all who live here should have access to it. Cities too often forget about the importance of those open spaces when it comes to building homes, commercial areas, and roads. There's no reason that essential infrastructure can't be built while maintaining the essential outdoor features that are so important to our region.

I understand the Open Spaces Commission has asked for edits to the plan, and I trust you will take these under serious consideration, including:

- under Core Priorities, open space integration must be prioritized. The complementary priorities of promoting a walkable mixed-use community and our natural and cultural resources are absolutely aligned with the core priorities of climate change and housing affordability.
- under Policy Maps, correct the zoning designations on parcel APN# 106-10-003 from Suburban Center to Suburban Neighborhood to align with community feedback and the identified Open Space top priority trail corridor between the Rio De Flag Water Reclamation Plant and Forest Service land. These areas are important for outdoor enthusiasts, wildlife, and to ensure residents have access to the 10-minute walking access standard.
- in chapter 4, ensure all planned trails are labeled as "planned trails on private land with no property rights." There's no reason large property owners (>400 acres) should be treated differently during the trail-planning process, as trails that would serve these larger parcels are just as important as trails considered for other properties.

Thank you for considering public comments in the plan development.

Myles Schrag  
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## Draft Regional Plan Comments

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From Valerie Piet <vmariepiet@gmail.com>

Date Mon 9/22/2025 2:18 PM

To Regional Plan 45 Comments <RegionalPlan45Comments@flagstaffaz.gov>

Some people who received this message don't often get email from vmariepiet@gmail.com. [Learn why this is important](#)

Dear regional plan staff, commissioners, and councilmembers,

Thank you for your diligent work on the draft regional plan. This is an enormous undertaking with numerous stakeholders. From my impression, it seems to fit the character and values of Flagstaffians generally.

I am a proud Flagstaff resident. I'm a nurse at Flagstaff Medical Center, part-time instructor at Coconino Community College, mother of an FUSD DeMiguel Lobo, and member of the Bicycle Advisory Committee (although I am speaking on behalf of myself here).

I am making the recommendations below based on a review of the draft regional plan.

### **1. Recognize alternative energy actions independent of APS goals**

Energy Goal E is "The Region increases and diversifies its use of renewable energy sources and systems while planning for the infrastructure needed to support an expanding and evolving electric grid." Policy Goal E.1 states, "Support renewable energy production; promote battery storage in the residential, commercial, and transportation sectors; and support energy storage in new, utility-scale renewable energy developments." Clearly, renewable energy expansion is a key goal in the regional plan.

Chapter 10: Energy and Climate Action makes the statement "The City's goal of achieving carbon neutrality is intrinsically linked to APS's carbon-free commitment" in the background section. Then again, in the "Clean Energy Production" section, the plan lauds APS for its commitment to renewable energy. A fundamental flaw with tying ourselves so strongly to APS is that APS's commitments may change.

As evidence, horrifyingly, the Arizona Corporation Commission (ACC) voted just last month to set in motion a repeal of the rules that mandate a portion of Arizona's electricity come from renewable resources. The ACC is a quasi-governmental agency that is subject to the whims and tides of our volatile populace, and the APS is more responsive to the shareholders who receive paychecks than the communities it serves.

What will the city and county do if APS abandons its renewable energy goals? I believe this is a fundamental flaw that needs significant attention before the regional plan is adopted.

## **2. Take a harder stance against water-intensive data centers**

Chapter 10: Energy and Climate Action contains the subsection “Data Centers and Chip Manufacturing.”

“In recent decades, the demand for digital services has grown rapidly, requiring a network of energy- and water-intensive data centers and semiconductor chip manufacturing facilities. These data centers use 10 to 50 times the energy per square foot of floor space than a typical office building and account for approximately two percent of total US electricity use. Several data centers are planned or are under construction within APS’s service territory, though none are currently proposed for the Region. APS projects that data centers will be a primary driver of forecasted energy growth and is planning for increases in annual peak demand and energy needs due to data center load. Manufacturing of semiconductor chips (for computers, phones, cars, and other technological devices) is a growing land use in Arizona and across the US that can use millions of gallons of water every day. Although there are currently no semiconductor chip manufacturers in the Region, it is important to consider the potential future impacts of these facilities on local energy and water supplies.”

While I appreciate the recognition in this section that data centers are extremely water and energy-intensive, it falls short in taking a hard stance that these data centers do not have a home in our region.

While there are currently no chip manufacturers in our region or proposed projects, certainly, these will appear throughout the life of this document. Future plan users should be better guided by this document to reject permitting or proposals for future data centers.

I suggest rewording the last sentence of the subsection above to more clearly indicate unfavorability towards resource-intensive data centers, as well as mentioning it throughout Chapter 9: Water Resource Management.

## **3. Define the goals of a rural transit service**

Chapter 6: Transportation of the draft regional plan lists the following high-priority action item:

“Establish rural transit service within the Region that is consistent with County land use plans based on funding availability, cost effectiveness, location of major trip generators, distance between generators, and the needs of transit-dependent individuals.”

In Appendix C, the reader learns there is ongoing work on this topic as a partnership between County Public Works, Northern Arizona Council of Governments (NACOG), officials from cities/towns benefiting from transit service, the Economic Collaborative of Northern Arizona (ECONA), and MetroPlan. However, the goals are not mentioned anywhere in the text. Broadly, the goals or basic idea of a rural transit service could be discussed where relevant in ‘airport, rail and freight’ or ‘safety and convenience for the most vulnerable’ or ‘reducing reliance on the automobile.’ It will be hard for plan users to take action on a high-priority action item if the goals are not defined.

## **4. Identify airport transit as a priority for future Mountain Line growth**

Page 6-6 in Chapter 6: Transportation states, “there is currently no public transit serving the airport.” The Mountain Line Strategic Plan 2020-2025 calls out the airport as an opportunity for future routes or services. I believe Mountain Line service to the airport would be a great opportunity to reduce vehicle miles traveled and parking burden at the airport, and I would like to see it identified as an opportunity in the regional plan.

Thank you,

Valerie Piet

09/22/2025

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208-569-9133



# CITY OF FLAGSTAFF

September 19, 2025

To the Planning and Zoning Commission:

The City of Flagstaff's Bicycle Advisory Committee (BAC) met on September 11 and September 18, 2025 to review and discuss the public hearing draft Regional Plan 2045, and would like to offer several comments.

The BAC wants to express its appreciation for the level of work that has gone into preparation and community outreach for the Regional Plan. We are supportive of the policy goals expressed in the Regional Plan document. The BAC also appreciates the opportunity to provide comments on the draft document, and we are thankful that our previous comments have been considered, and in many cases, incorporated into the draft document.

## **Vulnerable road users**

Please consider including a definition for vulnerable road users that is more typically used in transportation planning and limited in scope. For example, the Federal Highway Administration (FHWA) uses the term Vulnerable Road Users (VRUs) to refer to people who have less protection than occupants in motor vehicles, making them more susceptible to serious injury or death in a crash. This category specifically includes pedestrians, bicyclists, and others using personal conveyance devices such as wheelchairs, scooters, or micromobility devices.

The broader definition of VRU that addresses equity and disparate safety outcomes, which is listed on 6-11, changes the meaning of VRU and potentially confuses the intent of Policy TS.1 *Prioritize the safety and accessibility of vulnerable road users as the primary consideration in planning for streets and transportation systems*. This policy should be clear in that it prioritizes transportation for pedestrians, bicyclists, wheelchairs, scooters, and micromobility devices.

Addressing equity in transportation and disparate safety outcomes is also an important issue, and should be addressed in the plan under a separate, specific policy. It should be noted that the study cited on 6-11 (Dangerous by Design) thoroughly documents populations and communities that are most at risk when streets are unsafe, but it does not refer to or define these populations as vulnerable road users.

## **Forest access - Singletrack access - Neighborhood connectors**

These maps in the Active Transportation Master Plan collectively promote robust local connectivity for pedestrian and bicycle travel, including access to neighborhoods, shopping, employment, school, parks, open space, and regional trails. These facilities also promote equity by enhancing multimodal access for all parts of the community.

We would like to see these maps either included or referenced in the Regional Plan to help acknowledge the importance of these connections to the community and to ensure that existing access points are preserved, and new access points are implemented as the city grows and develops.

### **Flagstaff Loop Trail – Arizona National Scenic Trail**

We recommend that both of these trails be depicted on Map 4-6 Regional Trails Plan, and that text be added describing these trails and affirming their significance as part of Flagstaff's trail network.

### **Urban trails map**

The Flagstaff Urban Trails System (FUTS) is an important part of our community character and identity. FUTS trails are the highest rated component of our transportation system (MetroPlan Trip Diary Surveys, 2006, 2012, 2018, and 2024) as well as our most well-used recreation facility – the Flagstaff Citizen Survey of 2021 found that 85 percent of residents used FUTS in the last 12 months. Almost three-quarters of bike commuters use the FUTS for a part of their commute.

Over the past 35 years, the City has carefully planned for the FUTS – a FUTS plan has been included in the last four regional plans, dating back to 1987 – and we have made a substantial investment in the system.

The alignment of a FUTS trail is an important consideration for both the appeal and functionality of that trail, and FUTS work best when they serve both a recreation and transportation function. This occurs when FUTS are useful and convenient for travel by foot or bike, but also provide an enjoyable experience.

Factors that provide an appealing context for trails include greenways, natural areas, parks, landscaping, separation from vehicles, and integration into well-designed residential neighborhoods and commercial areas. Factors that work against appeal and functionality include indirect, out-of-direction, and non-intuitive alignments, trails through narrow corridors enclosed by walls, fences, and buildings, and alignments adjacent to roadways.

The disclaimer language and generalization of alignments in the draft Regional Plan will make it more challenging for the City to work with developers to create functional and appealing alignments for trails. We recommend revising the map and adding language to promote better alignments through future development and neighborhoods, such as following linear natural features like washes and hillsides, designing trails to be an integral part new development, and incorporating greenways and landscape buffers with the trail alignment.

Thank you for the opportunity to provide our thoughts.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Crim".

Daniel Crim, Chair  
Bicycle Advisory Committee