

To: Regional Plan Committee,

Date: September 8, 2025

Regional Plan Public Hearing Review - Errata and Comments from Mary Norton (as a citizen):

Errata:

1. Chapter 1/p5 illustrated Land Ownership Map:
 - a. Is there a numbering error on the State Land Parcels? There are two SLP 30 and two SLP 26.
 - b. SLP 30 to the west of 17 (off Woody Mountain) has already been taken down by Roberts Communities a year ago. Even though the county parcel viewer doesn't reflect the change in ownership yet, we all know this & owner Scott Roberts has been as some of the public meetings (such as the community vision meeting held in June at Lowell). Therefore, this map is already out of date; needs update.
2. Chapter 3/pgs 10-11: On Map 3-1, the key/legend using various colors of greens is difficult to differentiate on the map itself. Suggest using more definitive colors.
3. Chapter 4/pg 13 – Legend for Estate Residential should be ER (not just E).

Comments:

1. Chapter 3/pg 4 re Parking Policy. Policy PK3: "Pursue **year-round, on-street** public parking and related operations and maintenance to support reductions in private parking and promote affordability." Disagree, too specific, too narrow. Suggest deleting highlighted verbiage to allow more flexible considerations (as mentioned in green box Chapter 6/pg 12).
 - a. Also make same change in first Action Item/"Fund", Chapter 6/pg 13).
2. Chapter 4/pg 6 re Preferred Scenario: Highly aspirational – relies on (stated) scarce public funds, successfully incentivizing smaller units, getting landowners/developers/homebuilders to build what we what/need and not the highly profitable larger homes on large RR/R1/ER lots with exorbitant lot premiums. How to prevent smaller attainable homes from going to STRs and second homes (needs legislative change at state & local level).
3. Chapter 4/pg 36, Map 4-4 Street Network, city scale – Why is the entire site of the Symmetry state land parcel and Little America without even Planned or Proposed street connectivity and only stated as "Area subject to future connectivity study". This should be, at minimum, more than "subject to" and something stronger stated on this map.
4. Chapter 4/pg 37, Map 4-5 Urban Trails Plan – I am personally adamantly opposed to differentiating between the size of the property of private land. Why are we creating a

separation of parcels under & over 400 acres? All of our major landowners own 405+ acres, and this acquiescing to them is not in service of the city and its residents.

5. Chapter 4/pg 39, Map 4-7 Bikeways Plan – there should be at least aspiration bikeways plotted in the undeveloped land south of I-40 that is the Symmetry state land parcel and the Little America land.
6. Chapter 7/pg 9 – Unmapped Resources, Large Stands of Ponderosa Pine: Whereas emerging info is available on tree resources throughout the city and region (as evidenced by the info & technology to be utilized in the city’s approved pilot program for an alternative to the natural resource protection program for tree resources), why is mapping of Large Stands of Ponderosa Pines not to be included at this time or as an Action Item to do within reasonable timing? Please reconsider.
7. Chapter 10/pg 7 action items: “Code: Update the City Sustainable Building Resolution and Sustainable Residential Building Incentives to further implement net-zero energy standards”. Reaching net-zero REQUIRES offsets, such as solar panels. Is this an accurate action item? Should it read net-zero-ready/zero-energy ready?

Thank you for your consideration,

Mary Norton (comments as a private citizen)

Flagstaff Regional Land Use Plan 2045:

(2025 Public Hearing Draft)

From a Flagstaff Disability Advocate: Impressions Relative to Accessibility, Inclusion, and Universal Design August 2025

Russell R. Randall

Barrier Free Flagstaff (BFF): Flagstaff disability advocacy group

Northern Az Community of Practice Transition Team (NACoPTT): Flagstaff disability advocacy group (member of the Arizona Community of Practice on Transition)

Positive impressions: marked with + (multiple = stronger)

Suggestions for plan improvement: underlined and marked with —

Overall Impression: A huge improvement on the Public Review Draft, creating a much more inclusive Plan. ++++++

General impressions:

-This draft has been completely re-drawn with many additional statements of accessibility, inclusivity, and universal design. This is especially true in Chapter 3, *Goals and Policies*. ++++++

-Creating a Sense of Place: “Prioritizing accessibility by incorporating universal design features to ensure inclusivity for all.” +++++

-There should be more discussion of accessibility and inclusion in Action Items, indicating what will be done to create a “Sense of Place” for all. (See “Specific Impressions.”) Also, there should be discussion of universal design throughout the plan and in the Glossary — — —

-Throughout the draft (25+ times) maps and charts are used that are inaccessible for people with vision impairments, particularly colorblindness. In many cases this could be rectified through the use of patterns, textures, labels, or icons to provide information. Increasing size of font would help. — —

-There is no discussion of accessibility or inclusivity in Chapter 5: Social and Economic Systems. This chapter needs improvement. — — —

-The *Glossary* includes disability related terms. More are needed. + —

Specific impressions:

Chapter 1: Introduction

P 1-12: “Priorities...” “Inclusivity” is specifically mentioned. ++

Chapter 3: Goals and Policies

P 3-2 Housing :“Accessibility” mentioned multiple times. Accessible parking specifically included. ++

P 3-3: Neighborhoods: NE.6: Improve housing by helping vulnerable homeowners....safety and accessibility” + +

P 3-4 Parking Goal: “PK.4 “Provide... accessible parking” (with photo) +++

P 3-7 MT Goal: “affordable and accessible transportation” ++

P 3-7 MT.1 and MT.2a: “improve safety and accessibility” and “connectivity and accessibility” ++

P 3-9 DP Goal: “ support attainable housing” Add “accessible” —

P 3-9 “ Creating a Sense of Place”: “Prioritizing accessibility by incorporating universal design features to ensure inclusivity for all.” ++++

P 3-10 Goal TS: “creates an inclusive, safe...” “Add “accessible” + —

P 3-10 TS.1, TS.3a, TS.4: “accessibility of vulnerable road users,” “accommodation for all users,” “ accommodate all people” +++

P 3-10 “Accessible Parks,” “provides diverse recreational needs; is accessible to all...” +++

P 3-15 HE Goal: “diverse economy for all” +

P 3-15 HE.3: “Promote..” Add “accessible and inclusive” pathways. — —

P 3-19 PS Goal: “services for all” +

Chapter 4: Growth and Land Use

P 4-6 “Livability & Attainability: ...aims to create a more livable” Add “inclusive” and affordable Region.... —

P 4-6 “Livability and Attainability: “encouraging more compact and diverse” Add “and universally designed” housing types... — —

P 4-14 “All Neighborhoods”. “...development pattern is connected and inclusive...” +

- P 4-15 “Transportive Land Use” : “wider sidewalks” +
- P 4-15 “Transportive Land Use” : Physical form: Key features include...**Add**
“universally designed” “accessible and inclusive spaces” +++ –
- P 4-16 “Mix and Location of Uses:” **Add “Consider universally designed structures”**. – –
- P 4-16 “Mix and Location of Uses: Implement managed parking” **Add**
“(including accessible parking)” “such as...” – –
- P 4-16 “Parks: Create central” **Add “accessible”** “activated public spaces” –
- PP 4-17, 4-19, 4-21 “Concept images”: Add “Universally designed” enhanced
pedestrian crossings” **Add: “curb cuts, ADA compliant ramps, truncated
domes, and Accessible Pedestrian Signal crossings.”** – – –
- P 4-18 “Mix and Location of Uses:” **Add “Consider universally designed
structures”**. – –
- P 4-18: “Mix and Location of Uses: Design...create efficient parking” **Add “(that
includes accessible parking)”** – –
- P 4-18 “Mix and Location of Uses:” **Add “Consider universally designed
structures”**. – –
- P 4-20 “Parks:Provide “ **Add “inclusive”** social gathering places. –
- PP 4-22, 4-23 “Districts”: “Accessible facilities” +
- P 4-26 “Parks” : “accessible to all” +++
- P 4-29 and 4-33 “Concept images” **As pictured, crosswalks are not ADA
compliant.** – –
- PP 4-30, 4-31, 4-32 “Design and other considerations:” Add (to each): **“Consider
universally designed structures”**. – –
- P 4-34 “Building Block:...is the pulse of civic activity” **Add “creates a sense of
place for all”** and – –

Chapter 5: Social and Economic Systems:

There is no discussion of accessibility, inclusion, or universal design. – – –

- P 5-3 “Housing Insecurity”: **Include a statement such as “This is likely to be
especially true among members of the community who identify as
having disabilities.”** – – –

- P 5-5 “Housing insecurity can include...” **Add “lack of ADA compliant accessible housing”** — —
- P 5-6 “Housing Insecurity”: “Addressing Flagstaff’s racial gap” **Add “and ability”.** —
- P 5-6 “Homelessness: **Add a statement such as “Roughly half of people experiencing homelessness have a disability with rates of homelessness 2.5 times higher for people with disabilities compared to the general population.”** — — —
- P 5-8 “Housing Services and Support Programs”: **Add a statement such as “Federal law prohibits discrimination against people with disabilities in housing transactions,** — — —
- P 5-8 “Housing Services and Support Programs”: **Add a statement “Coordinate with federal agencies and community partners to assist people with disabilities to achieve housing stability.”** — — —
- P5-11 Workforce Development :”support its identified sectors”**Add: “including community members with disabilities”** — — —
- P 5-14 “Public Health”: Mental health conditions are mentioned but no mention of mental health facilities. **Add a statement including The Guidance Center, Southwest Behavioral, Terros, etc.** + — —
- P 5-16 “Food System...Children, Hispanic, Black, and Native American populations” **Add:“as well as members of the disability community...”**
— —
- P 5-18 Action Items: “Fund”: “potential funding sources for affordable...”**Add “and ADA accessible”** — —
- P 5-18 Action Items: **Add: “Partner:” “Continue to partner with the U.S. Department of Housing and Urban Development in facilitating the Mainstream Vouchers program, assisting non-elderly persons with disabilities to achieve housing stability.” “Long Term”** — — —
- P 5-18 Action Items: **Add: “Fund”: “Continue to partner with the U.S. Department of Housing and Urban Development in funding and facilitating Permanent Supportive Housing(PSH.), providing housing assistance and supportive services to households with at least one member with a disability.”**
“Long Term” — — —

Chapter 6: Transportation

P 6-3 Roads: “ inclusive transportation” +

P 6-3 Active Transportation: “support regional mobility and accessibility” +

P 6-3 Active Transportation: ...”59 miles of FUTS trails in the City.” Add statement **“Some of these trails are accessible to individuals with mobility challenges or other disabilities.”** — — —

P 6-4 Active Transportation:“Providing enhanced” **Add “universally designed”** “and grade -separated...” — —

P 6-4 Active Transportation: “Combinations of:” **Add “universally designed”** “enhanced crossing treatments” — —

P 6-6 Active Transportation: “paratransit service provide an ‘ADA Guaranteed Ride Area” **Add a hyperlink and/or include in Glossary** + —

P 6-7 Transportation Findings... : “Support safety,” **Add “accessibility”** “ and convenience...” — —

P 6-8 Most Vulnerable: “vulnerable road users: people who walk,” **Add “people with disabilities”**.... — —

P 6-9 Intelligent Transportation Systems: add to statement “ITS” Add **“and universal design”** “solutions can be employed to expand ADA accessibility” +++ — —

P 6-11 Safety: **“Accessible universal design** is essential in addressing the needs of the most vulnerable...” +++++

P 6-12 Streetscapes and Parking: No mention of accessible parking. **Add statement: “The City will continue to follow the ADA federal law for the number of required accessible spaces based on the total number of parking spaces provided.”** — — —

P 6-12. Streetscapes and Parking: Curbside: **Add statement “ The City will resist use of rolled concrete curbs as they are generally non-compliant with the Americans with Disabilities Act (ADA).”** — — —

P 6-12 Streetscapes and Parking:”Improvements such as **Add “accessible”** “multi-use trails...” —

P 6-13 Action (Code): “Accessibility for all...” +

P 6-13 Action (Plan or **Fund**): “Evaluate the use of ITS signal technology...” **Add: including the use of accessible pedestrian signals”** “to determine...”

— — —

P 6-13 Action (Plan): “Account for all users, including pedestrians...” **Add: “people with disabilities”**... — —

P 6-13 Action (Fund): “Maintain streets, pedestrian paths, bikeways, crossings, and FUTS trails in good condition and free of snow, debris, and obstructions so they are safe and functional for all users, regardless of transportation mode or ability.” **Add “accessible” after functional**”. +++++ — —

P 6-13 **Add “Action (Fund): Provide accessible parking in central, convenient locations in all parking lots and managed parking plans.”**
— — —

P 6-13 Add “Action (Fund): Universally design and maintain more access points and trails on the FUTS so as to be ADA compliant and accessible to all users, including those with disabilities.” — — —

Chapter 7: Resource Stewardship...

P 7-2 Dark Skies: “safe and efficient outdoor lighting...” **Add “ADA compliant”**
—

Chapter 8: Parks...

P 8-3 Background: “Equitable access to parks considers” **Add “accessibility”**
— —

P 8-3 Future Parks: “ accessible and inclusive recreation” +++

P 8-3 Future Parks: **No mention of therapeutic recreation.** “a new master plan for parks, recreation...” **Add: “therapeutic recreation “** — — —

P 8-3 Future Parks: “Trails...Providing **Add”inclusive”** “access...” —

P 8-3 Future Parks: “Securing new open spaces, expanding trails,.. **Add “ensuring inclusive access”** “and...are vital to maintaining” **Add: “inclusive** “ diverse recreational activities for” **Add: “all “** residents... — —

P 8-4 Action:Fund: Consider...fund regional park, recreation, **Add”therapeutic recreation,”** and... — — —

P 8-4 Action: Partner: “Create...construction of new” **Add “universally designed”** active recreational facilities” **Add “which are both accessible and inclusive...”**. — — —

Chapter 11: Infrastructure and Public Safety

- P 11-8 Evacuation Routes: **Include a statement regarding evacuation procedures for the elderly and/or members of the disability community who may need assistance during evacuation.** — — —
- P 11-9 Fire Adapted Communities: “Inclusive engagement of diverse communities” +
- P 11-19 Action: “Educate: safe evacuation for all” : **Add a statement regarding evacuation for the elderly and/or members of the disability community who may need assistance during evacuation.**
- P 11-20 Educate: “identify vulnerable residents...” ++

Glossary

- P G-1 “Accessible...” +++
- P G-1 Add: **“Accessible Parking: Parking spaces complying with the Americans with Disabilities Act (ADA) that have specific features that make it easier for people with disabilities to access sites.”** — — —
- P G-1 Add **“ADA Guaranteed Ride Area - The geographic zone around a fixed-route public transit system where ADA-mandated complementary paratransit service must be provided.”** — — —
- P G-1 **Add “Accessible Housing- See Housing”** —
- P G-3 Complete Streets: “including pedestrians, **Add: “people with disabilities”**, bicyclists... —
- P G-3 Curb Management: “ride-share services, pedestrians, **Add “people with disabilities”**, cyclists... —
- P G-3 Enhanced Crossing” A **“Add “ADA compliant”** “crossing...” —
- P G-4 “Equity...all” +
- P G-5 “Housing”: **Add “Accessible Housing refers to the construction or modification of housing to enable independent living for persons with disabilities.”** — — —
- P G-5 “Inclusive...” +++
- P G-7 “Paratransit”: **Add “for people with disabilities who may be unable to use standard bus services”** — — —
- P G-8 “Transportation Equity: “ ++

P G-9 **Add “Universal Design: The practice of creating buildings, environments, products, and services to be usable by all people to the greatest extent possible, without the need for adaptation or specialized design.” — — —**

Butler 4th Improvement Project & call for Public Comment

From Nickswork1 <nickswork1@aol.com>
Date Tue 9/9/2025 8:01 AM
To Regional Plan 45 Comments <RegionalPlan45Comments@flagstaffaz.gov>; Sara Dechter <SDechter@flagstaffaz.gov>
Cc eva caruso <evarn9@aol.com>; Lindsey Autumn DeStefano <lindslydii@gmail.com>; Jeff Bauman <jbauman@flagstaffaz.gov>; Paul A. Mood <paul.mood@flagstaffaz.gov>; Khara House <Khara.House@flagstaffaz.gov>; Lori Matthews <Lori.Matthews@flagstaffaz.gov>

You don't often get email from nickswork1@aol.com. [Learn why this is important](#)

Greetings Ms. Dechter, In response to the call for Public Comment regarding the Flagstaff Regional Land Use Plan 2045 please review our correspondence below.

We the residents of Woodshire on Butler (3001 E. Butler) have great concerns regarding how close both the Roundabout and Herold Ranch Road is currently proposed to be to our development. Please see earlier correspondence to the City (Below).

Given how close (it appears it's a matter of yards) that Herold Ranch Road and the Roundabout will be from our homes on the West side of our development We the residents of Woodshire are are requesting a meeting at our site to better understand the layout of this proposal. We are having difficulty assessing the proximity of the roads to our homes and it's impact including how many tree's will be removed and how our developments parking lot will be protected from through traffic coming and going onto Herold Ranch Road onto Butler.

Could we please set a time to meet at our development and be walked through the proposal. We can be reached at (602) 332-1996

Most Sincerely,

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Nick Caruso, Eva Caruso and fellow resideints of Woodshire on Butler

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, forwarding, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Although my computer is password protected, my e-mail is not encrypted. I cannot guarantee confidentiality of email communication. If you choose to communicate

confidential information with me via e-mail, I will assume that you have made an informed decision and agree to take the risk that e-mail may be intercepted.

----- Forwarded Message -----

From: Nickswork1 <nickswork1@aol.com>
To: Eva Caruso <evan9@aol.com>; Trevor Henry <thenry@flagstaffaz.gov>
Cc: Jeff Bauman <jbauman@flagstaffaz.gov>; Paul A. Mood <paul.mood@flagstaffaz.gov>; Khara House <khara.house@flagstaffaz.gov>; Lori Matthews <lori.matthews@flagstaffaz.gov>
Sent: Wednesday, August 27, 2025 at 05:55:41 PM MST
Subject: Re: Woodshire on Butler - Butler and 4th Street Project

Hello Trevor, thank you for responding in a timely manner to our inquiry below. We the residents of Woodshire on Butler have great concerns regarding how close both the Roundabout and Herold Ranch Road will be to our development.

Specifically regarding item (c) in earlier correspondence we were assured "100%" the public road (Butler or Herold Ranch Road) will not go through the Woodshire Development*. We are trying to reconcile that with "the fire lane will be shortened to a driveway that will connect to Herold Ranch Road that extends to the south" **.

*(Again, I can say 100% the public road (Butler or Herold Ranch Road) will not go through the Woodshire Development).

 ** the fire lane is required as a secondary access, and when the roundabout goes in, the fire lane will be shortened to a driveway that will connect to Herold Ranch Road that extends to the south.

Given how close (it appears it's a matter of yards) that Herold Ranch Road and the Roundabout will be from our homes on the West side of our development We the residents of Woodshire are are requesting a meeting at our site to better understand the layout of this proposal. We are having difficulty assessing the proximity of the roads to our homes and it's impact including how many tree's will be removed and how our developments parking lot will be protected from through traffic coming and going onto Herold Ranch Road onto Butler.

Could we please set a time to meet at our development and be walked through the proposal. We can be reached at (602) 332-1996

Most Sincerely,

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Nick Caruso, Eva Caruso and fellow resideints of Woodshire on Butler

From: [Russell Randall](#)
To: [Regional Plan 45 Comments](#)
Subject: Impressions of the Regional Plan 2045 Public Hearing Draft
Date: Thursday, September 4, 2025 7:59:28 AM
Attachments: [PDF Regional Plan 2045 Public Hearing .pdf](#)

Friends,

Today I am addressing you as a representative of Barrier Free Flagstaff (a local disability advocacy group) as well as the Northern Az Community of Practice Transition Team (also a disability advocacy group).

Please see (attached) my impressions of the Regional Plan 2045 Public Hearing Draft.

Thank you.

Russell R. Randall M.Ed.
(he, him, his)

*Northern Az Community of Practice Transition Team
Barrier Free Flagstaff (BFF)*

“For we are leaders of inclusiveness and community, of love, equity, and justice.” **Judith Heumann**

Flagstaff sits at the base of the San Francisco Peaks, on homelands sacred to Indigenous people throughout the region. We honor their past, present, and future generations, who have lived here for millennia and will forever call this place home.

Flagstaff RLUP 2045 Potential Errata

From Ian Sharp <ian@jefuller.com>

Date Thu 9/4/2025 3:52 PM

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

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

I have an errata that I'll share. Page 11-4 cites a dam failure on Lower Lake Mary. "Dam" is a technical term, and what failed was an earthen berm, or a levee at best.

Thank you.

Ian Sharp, P.E.

Project Manager/Engineer/Hydrologist

JE Fuller / Hydrology & Geomorphology, Inc.

30 YEARS OF SERVING OUR CLIENTS AND COMMUNITIES

3111 N. Caden Court, Ste. 120 | Flagstaff, AZ 86004

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www.jefuller.com

To: Regional Plan Committee

From: Ian Sharp, as a private citizen, 3064 E Cold Springs Trl

RE: Regional Plan Public Hearing Review

Errata

1. Page 11-4 cites a dam failure on Lower Lake Mary. “Dam” is a technical term (as understood by the Arizona Department of Water Resources, and what failed was an earthen berm, or a levee at best. Replace “dam” with earthen berm.

Comments

1. The Flagstaff Regional Land Use Plan 2045 discusses “floodplains” in several places, mainly in the context of natural hazards, land use restrictions, and historical practices. The plan advises against development in the 100-year floodplain to reduce risk and preserve natural functions. I recommend the following:
 - a. Replace 100-year with 1-percent Annual Chance Exceedance flood. This is a more accurate term and helps reduce the incorrect misunderstanding that a 100-year flood will only happen once per 100 years.
 - b. Tighten the definition. Flagstaff is “undermapped”. FEMA has mapped riverine streams, such as the RDF and Switzer Canyon. However, there are unmapped floodplains throughout the City, such as much of Sunnyside. FEMA could map these areas, or the City could choose to map them as an administrative floodplain. If the RLUP intends to incorporate the 1% ACE/100-year flood into its goals, it would be best to clearly define what is intended by using the 1% ACE flood. To be more clear, is 100-year floodplain the FEMA floodplain, or might it be understood to be any regulatory floodplain such as one adopted by the City?
 - c. In light of the goals of infill, it should be understood that many of the areas planned for infill are going to be impacted by regulatory floodplains. If FEMA, the City, or the County conducted expanded floodplain mapping, large portions of prime infill land could be designated as floodplains, potentially conflicting with the plan’s core strategy of focusing growth inward.
2. The FRLUP outlines a future in which electricity demand increases due to warming temperatures, increased adoption of EVs, and a shift away from Natural Gas

towards electrification. The P&Z Commission has already heard from one applicant that the costs for electricity have increased significantly in their apartments, with the applicant listing large data centers as part of the problem. Moving away from Natural Gas has some problems:

- a. Flagstaff is vulnerable to power outages during storms. During the 2021 Texas winter storm, natural gas remained functional in many households during power cuts, preventing worse humanitarian outcomes. Maintaining 2 sources of energy helps to limit our vulnerability and to provide redundancy.
- b. Flagstaff households already face high energy burdens, with low-income families spending 13 percent of their income on utilities (per page 10-5). Natural gas is typically less expensive than electricity, and this may be further exacerbated. Full electrification of heating and cooking could worsen burdens on residents.
- c. The plan assumes APS can expand grid capacity and storage at the pace needed to meet surging demand. APS projects an additional 24,000 GWh statewide demand by 2040, requiring massive grid upgrades. If delayed, and if worsened by upcoming cuts to hydroelectric production, households may face energy shortages or price spikes that could be limited by maintaining natural gas.

I would like to see the RLUP move away from abandonment of natural gas and instead strive to maintain two energy sources to maintain resiliency, redundancy, and affordability.

3. I am in the camp of people who are frustrated with the City's climate goals. I recognize that I am in a minority and that the FRLUP must work towards achieving what the City has mandated. I would like to see the FRLUP be more consistent, however, in dealing with transportation, given that it puts the burden of achieving the carbon goals upon residents, while at the same time the FRLUP rightly encourages tourism, which the plan recognizes as a major contributor to regional traffic and emissions, noting that about five million people visit Flagstaff each year.

Despite tourism's large role in traffic congestion and emissions, the plan does not provide proportional strategies for managing or mitigating visitor impacts. Instead, it suggests expanding EV infrastructure, which will likely be funded by local resources, but this would have minimal impact on reducing tourism-related emissions given the short duration and high volume of visitor trips coupled with the vast majority of

tourists driving non-electric vehicles. This imbalance places the burden of carbon neutrality disproportionately on residents, while underestimating the environmental costs of Flagstaff's tourism economy.

I propose the following be considered:

- A. Tourism Transportation Impact Analysis
 - a. Require the City and County to track and report the share of GHG emissions and traffic congestion attributable to visitors.
 - b. Incorporate this analysis into annual carbon neutrality and housing affordability progress reports.
- B. Tourism Mitigation Strategies
 - a. Develop regional partnerships with Arizona DOT, National Park Service, and private tourism operators to promote regional shuttles and coordinated transit systems serving high-volume destinations (Grand Canyon, Sedona, Snowbowl).
 - b. Establish incentives for tour operators and large venues to provide low-emission group transportation rather than relying on individual vehicles.
- C. Equitable Cost Distribution
 - a. Create a funding mechanism (e.g., tourism impact fees, lodging/car rental taxes) that ensures the cost of EV infrastructure and carbon offsets is equitably shared between residents and visitors.
 - b. Dedicate a portion of these revenues to affordable housing and transit improvements for local workers, reducing displacement pressures caused by the tourism economy.
- D. Plan Language Revision
 - a. Amend Chapter 6: Transportation and Chapter 10: Energy and Climate Action to explicitly acknowledge that visitor transportation emissions (and potentially their lodging) must be addressed as part of the City's climate strategy, rather than treated as incidental.

4. The FRLUP falls short in addressing short-term-rentals (STRs) and second homes. I understand Arizona has preempted what can be done by the City, but there may be more that can be added to the FRLUP to address these issues. I think the FRLUP should include the following:

- a. Add language to track and evaluate the effect of short-term rentals and second homes on the availability and affordability of workforce housing.
- b. Consider adding language to dedicate revenues generated from short-term rentals, including transaction privilege taxes and any future impact fees, to the City's affordable housing trust fund or similar programs supporting permanent workforce housing.
- c. Add language stating that Flagstaff will collaborate with other Arizona municipalities to advocate for state legislative changes that allow local governments to regulate short-term rentals in a manner that protects housing supply, neighborhood stability, and community character."
- d. Consider offering development incentives (e.g., fee reductions, expedited review, density bonuses) for projects that record primary-residence deed restrictions on a share of units."