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February 6, 2026

Alaxandra Pucciarelli
Current Planning Manager
Planning & Development Services
211 West Aspen Avenue
Flagstaff, Arizona 86001

Re: Request for Development Standards Modification Under 10-30.20.040.B.4.c; Lone Tree Ranch

Dear Alax:

We represent Lincoln Avenue Community ("LAC"), a leading developer, owner, and operator of affordable housing across the United States. LAC is proposing to develop a 168-unit, "category 1" affordable multifamily development ("Lone Tree Ranch") on approximately 8.51 acres located at the northeast corner of Lone Tree Road and Pine Knoll Drive (the "Property"). The Property covers Coconino County Assessor's APNs 104-14-003G, -003H, and -033J and is composed of Tracts B, C, and D of the Final Plat for the Woods at Clear Creek.

Approximately 8.1 acres of the Property are located within a High Density Residential – Resource Protection Overlay (HR-RPO) district. LAC is currently processing Direct-to-Ordinance Zoning Map Amendment Request PZ-240024-04 (the "Application") to rezone the remaining 0.41 acres from Suburban Commercial – Resource Protection Overlay (SC-RPO) to HR-RPO and to remove the conditions of the Property's previous rezone.

DEVELOPMENT PROPOSAL

Lone Tree Ranch will consist of three- and four-story split-level walk-up buildings that will provide highly amenitized—yet attainable—housing for the Flagstaff community. It will house workers, families, and community members making no more than 60% of the Area Median Income ("AMI").

Lone Tree Ranch's buildings will be three- and four-story splits because of the Property's topography, and to reserve adequate space for parking and its desirable amenity spaces. Residents and guests will be provided with ample parking with Lone Tree Ranch's 286 parking spaces. Ingress and egress will occur from southwest and southeast along Pine Knoll.

Lone Tree Ranch will benefit the City and its residents by addressing the City's affordable housing crisis and by developing a vacant, infill property.

REQUEST

As a "category 1" housing development that provides 100% of its units to workers, families, and community members making no more than 60% AMI, Lone Tree Ranch is eligible for certain incentives contained in Flagstaff City Code Section 10-30.20.040.B. Enumerated incentives include reductions to the

required forest resource preservation rate and density bonus calculations. In addition to these enumerated incentives, LAC may request City Council approval for additional modifications under Section 10-30.20.040.B.4.c.

The purpose of this letter is to respectfully request approval of development standard modifications for the following three categories: (1) site layout and parking, (2) building and architectural standards, and (3) landscape standards. These modifications are key to Lone Tree Ranch’s viability as a high-quality, contextually appropriate, and economically feasible affordable housing development.

1. Site Layout and Parking

- (a) Section 10-30.60.060.A. Eliminate the “building forward” design guideline that calls for building fronts to be located at or near a sidewalk edge to allow parking between the Lone Tree Ranch’s buildings and Pine Knoll Drive.
- (b) Section 10-50.60.040.D.2.a. Adjust the number of parking stalls that may be aligned in a row before requiring a landscape island from eight (8) to twelve (12).

2. Building and Architectural Standards

- (a) Section 10-30.60.040.A.1.e. Increase the permissible height of exposed or visible retaining walls from five feet (5’) to thirteen feet (13’).
- (b) Section 10-50.20.030.B.2. Decrease the required recess depths along primary façade planes from approximately six feet (6’) and eight feet (8’) to approximately two feet (2’) and four feet (4’).
- (c) Section 10-50.20.030.B.7.b.4. Allow windows to be installed in a single vertical plane with the building’s exterior façade, as opposed to requiring slight recession.

3. Landscape Standards

- (a) Table 10-50.60.050.B. Reduce the number of trees installed on the Property from 175 to 120.

JUSTIFICATION

These standards should be modified for Lone Tree Ranch because the modifications benefit the public and satisfy the intent of the City’s code. The requested modifications are authorized under Section 10-30.20.040.B.4.c.i if the following criteria are met:

Criterion: *The modifications are consistent with and conform to the goals of the General Plan and any applicable specific plans.*

Response: As explained in detail in the Project Narrative included in the Application, Lone Tree Ranch’s design strongly supports the goals of Regional Plan 2030. And as explained below, the modifications proposed here are consistent with and conform to the following Regional Plan goals and policies.

- Goal E&C.2. Achieve carbon neutrality for the Flagstaff community by 2030.
- Goal E&C.5. Preserve dark skies as an unspoiled natural resource, basis for an important economic sector, and core element of community character.
- Policy E&C.6.8. Disturbed areas for improvements and landscaping for new developments shall emphasize the use of native, drought-tolerant or edible species appropriate to the area.

The parking area near Pine Knoll (which would otherwise be prohibited by the “building forward” guideline) will be equipped with EV-ready parking to accelerate clean mobility and promote the City’s carbon

goals. And the modification to landscape-island requirements helps with the installation of parking canopies which will reduce light pollution coming from Lone Tree Ranch’s parking area in furtherance of the City’s dark sky goals. The requested modifications will also minimize newly disturbed areas on the Property and the provided landscaping will be drought-tolerant and regionally appropriate.

- Policy CC.4.4. Design streets and parking lots to balance automobile facilities, recognize human-scale and pedestrian needs, and accentuate the surrounding environment.
- Goal CC.3. Preserve, restore, enhance, and reflect the design traditions of Flagstaff in all public and private development efforts.

The proposed modifications to parking layout and location balances the need for off-street parking while helping preserve slope resources on the eastern portion of the Property. Placement of the buildings behind the parking area also provides a buffer for the City’s park to the north, minimizing the distance any vehicle-related noises will travel. Additionally, the variety of roof forms used for different portions of Lone Tree Ranch’s buildings will have multiple pitches, eaves that wrap around gabled ends, and dormers to accentuate the roof planes. These features will add articulation and reduce scale while simultaneously reflecting the City’s design traditions.

- Policy LU.1.3. Promote reinvestment at the neighborhood scale to include infill of vacant parcels, redevelopment of underutilized properties, aesthetic improvements to public spaces, remodeling of existing buildings and streetscapes, maintaining selected appropriate open space, and programs for the benefit and improvement of the local residents.
- Policy LU.5.2. Promote infill development over peripheral expansion to conserve environmental resources, spur economic investments, and reduce the cost of providing infrastructure and services.
- Policy LU.13.4. Plan suburban development to include a variety of housing options.

The proposed modifications allow for the currently vacant Property to be developed with an affordable multifamily development that is contextually appropriate. This is precisely the sort of responsible infill development contemplated by Regional Plan 2030. Furthermore, the suburban-infill nature of Lone Tree Ranch will help conserve environmental resources and reduce the cost of infrastructure and services because it does not require expansion into the periphery of the City’s planning area. The modifications are also necessary to allow the Property to be developed with this type of multifamily affordable housing—i.e., they increase housing options in this area by providing multifamily housing as opposed to the single-family detached housing commonly found in traditional suburban areas.

- Policy NH.3.5. Encourage and incentivize affordable housing.
- Policy NH.6.1. Promote quality redevelopment and infill projects that are contextual with surrounding neighborhoods. When planning for redevelopment, the needs of existing residents should be addressed as early as possible in the development process.

The modifications facilitate the development of 168 units at 60% AMI, which directly implements several of the Regional Plan’s housing strategies. Furthermore, the mix of unit types allows families to have the space they need without being financially burdened by high rents or a mortgage on a home. This is difficult to find in any market as many new apartments are smaller and targeted at young professionals.

More specifically, the variety of multifamily rental units at affordable price points will provide housing opportunities for an underserved economic sector in an underutilized infill location.

- Policy E.1.7. Support policies and programming that reduce electricity, natural gas, and water consumption in order to conserve natural resources and reduce financial costs.

In wood-frame construction, best practice for window installation is to keep the nailing flange of the window frame in-line with the outside face of exterior sheathing—not recessing the window as prescribed in the City’s code. This is (among other reasons) because a single vertical plane minimizes the surface area of the building, which creates a more effective barrier between indoor (conditioned) air and outside (unconditioned) air while reducing the potential for thermal bridging. This practice is critical to achieving a HERS index rating of 65 which reduces electricity consumption for heating and cooling. Additionally, the proposed reduction in landscaping will conserve water used for irrigation while architectural articulation coupled with Lone Tree Ranch’s parking canopies will provide visual interest and shade to compensate for the reduction in installed trees.

Criterion: *The modifications will not be detrimental to the public interest, health, safety, convenience, or welfare of the City and will add to the public good as described in the General Plan.*

Response: The requested modifications further the public interest in several ways, including those listed above, and summarized below.

The modified site layout and parking will facilitate the installation of shade canopies that will help screen the bulk of the residential buildings from the right-of-way and will protect residents’ vehicles. And the buildings’ location minimizes the chance any vehicle-related disturbance will travel from Lone Tree Ranch’s parking area to the City park or single-family dwellings to the Property’s north.

The modified building and architectural standards allow for the necessary density on the relatively resource-constrained Property to render a 60% AMI project economically feasible. Additionally, and as noted above, the best practice for window installation in wood-frame construction is to maintain a continuous vertical drainage plane on the outside of the building to direct water and moisture away during inclement weather and reduce the potential for thermal bridging. The requested modifications will allow LAC to combine these best construction practices with the intent of the zoning code by providing a mix of thickened trim bands around the edge of the window openings. The thicker depth of the trim will provide a shadow line around the window to provide more articulation and visual interest than standard size trim while still maintaining a continuous vertical plane that protects against leakage (both fluid and thermal).

Finally, the modified landscape standards will not only promote the economic viability of providing 168 affordable housing units, but they will conserve water by using less plant material, while the parking canopies provide screening and shading that trees might otherwise provide.

Criterion: *The requested modifications will not endanger, jeopardize, or otherwise constitute a hazard to the property or improvements in the vicinity in which the property is located.*

Response: The proposed modifications will not endanger, jeopardize, or otherwise constitute a hazard to the Property or improvements in the Property’s vicinity because Lone Tree

Ranch must still be reviewed against all applicable codes (e.g., zoning, engineering, building, fire, etc.) before any construction may occur.

Criterion: *The proposed development is consistent with the character of the area.*

Response: The proposed development complements the character of the area by echoing the City’s design traditions and harnessing building materials that express traditional texture, scale, and color. The minimal modifications to Lone Tree Ranch’s design standards respect these traditions by providing suitable roof forms to add articulation and scale, stepping buildings down (both north to south and west to east) to break up building massing, and utilizing an appropriate level of scale to jog the buildings’ primary façade to ensure that straight runs never exceed thirty feet in length.

Criterion: *The type, quality, and amenities of the development are consistent with those found in similar developments that are available to the public at market rate.*

Response: Like all of LAC’s developments, Lone Tree Ranch is a high-quality and highly amenitized development. The approximately 7,500 square feet of amenity space will include a clubhouse, office space, barbeque area, fitness center, playground, and tot lot. Additionally, residents will have immediate access to the City park located directly to the north. At bottom, Lone Tree Ranch will be indistinguishable from a similar market-rate multifamily development.

* * *

For the foregoing reasons, LAC respectfully requests the modifications to site layout and parking, building and architectural standards, and landscape standards listed above. These modifications satisfy the intent of the City’s code and the above criteria while supporting Lone Tree Ranch’s viability as a fully affordable housing development. Should you have any questions or require more information, please do not hesitate to contact me at **(602) 256-4471** or **lschube@gbllaw.com**. Thank you for your consideration.

Sincerely,

GAMMAGE & BURNHAM



By

Lindsay C. Schube