

Milltown Mixed Use (PZ-24-00162)

Zoning Map Amendment Narrative (for Site Plan Modification)

I. Introduction

This Narrative is included with the Large-Scale, Direct-to-Ordinance Zoning Map Amendment Application (the “Application”) submitted by Gammage & Burnham, PLC on behalf of Toll Brothers (“Toll”), along with Vintage Partners (“Vintage” and collectively with Toll, the “Applicants”) to modify the previously approved Site Plan for Milltown. Vintage and its development partners have worked diligently to increase housing accessibility in the City of Flagstaff. Together with Toll, a nationally respected homebuilder, Vintage now proposes to revitalize a vacant infill property with a high-quality mixed-use development consisting of four commercial pads and a contemporary multifamily component (the “Project”). As explained in this Narrative, the Project supports the goals, policies, and spirit of Flagstaff’s Regional Plan by supplying housing and retail in a Regional Activity Center.

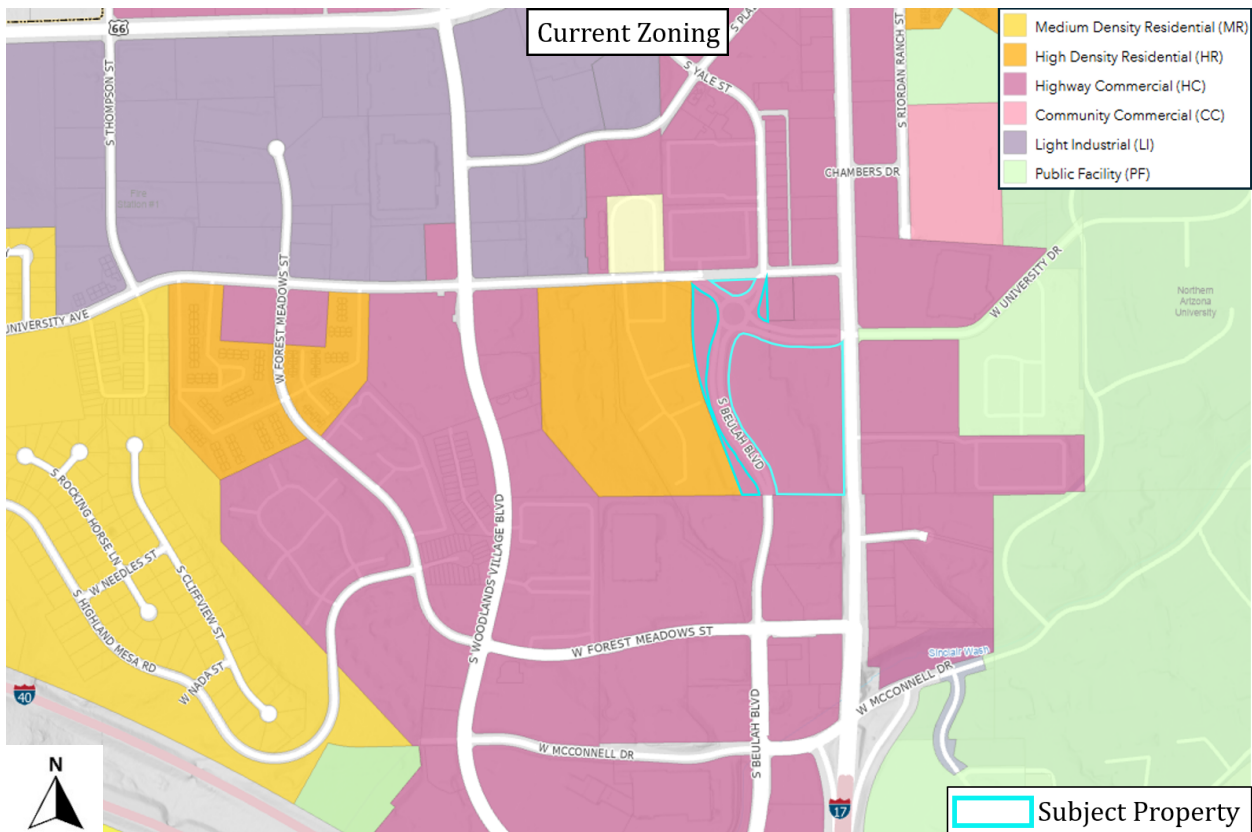
II. Subject Property

Applicants propose to develop the Project on approximately 12.29 acres of property assigned Coconino County Assessor’s APNs 103-21-024, -025, -026, and -027 (collectively, the “Property”). Aside from a multi-use path and associated pedestrian improvements, Parcels -026 (“Tract A”) and -027 (“Tract B”) will be left mostly in their current, natural state. Parcel -025 (“Lot 2”) will accommodate one commercial pad. And Parcel -024 (“Lot 1”), which is approximately 10.07 acres in size, will accommodate all other components of the Project, including 265 multifamily dwelling units and three commercial pads. The Property is shown in **teal** on the Aerial Map, below. Lot 1 is indicated with hatching.

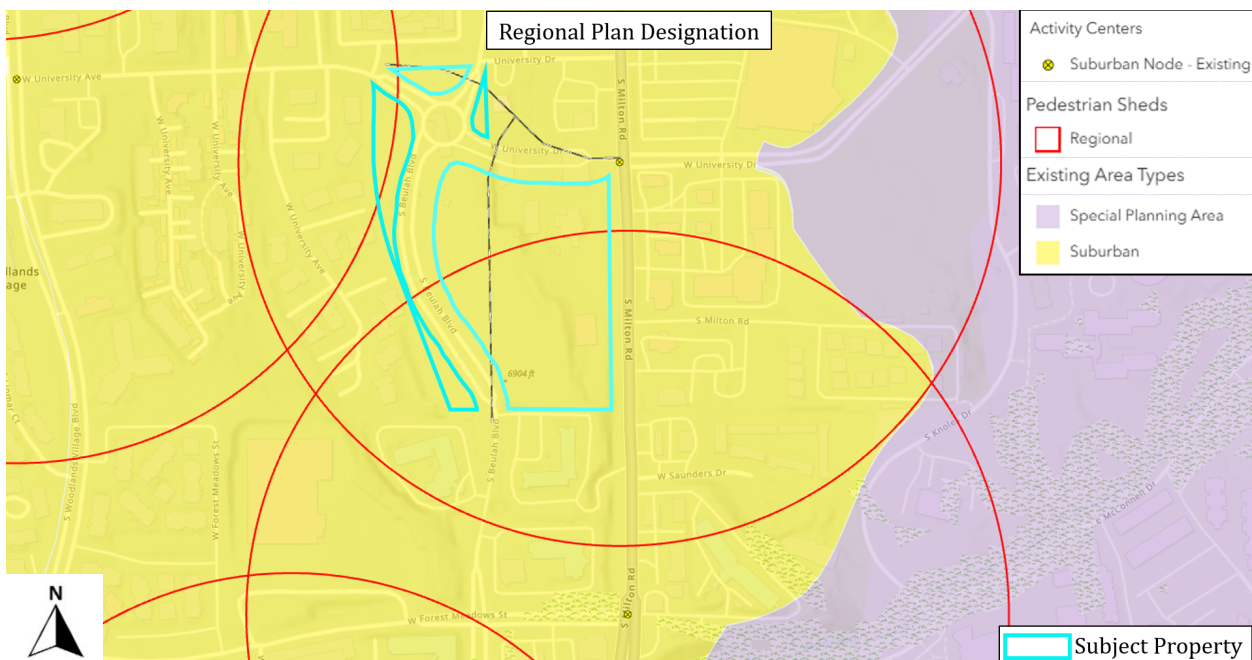


The Property is zoned HC – Highway Commercial and is located within the Resource Protection Overlay (“RPO”). HC zoning is intended for development of commercial and residential

uses, though residential uses should be buffered from adjoining highway corridors by commercial buildings. The Property is outlined in teal on the Zoning Map, below.



The Property is in an existing Suburban Area under Regional Plan 2030 and is situated within overlapping Regional Pedestrian Sheds of three existing Suburban Activity Centers (S8, S9, and S14). The Regional Plan calls for “[l]arger, mixed-use centers” in this location, with greater than fourteen dwelling units per acre. The Property is shown in teal on the Regional Plan Map, below.



As shown on the Location/Vicinity Map, enclosed with this application as **Item I.8**, Lot 1 is bounded to the north by University Drive, to the east by Milton Road, and to the west by a recently completed extension of Beulah Boulevard. Immediately surrounding uses include:

- Burger King and the Montessori School of Flagstaff (Westside Campus) to the north;
- Green Tree Village Shopping Center, In-N-Out Burger, Target, and other commercial uses to the east across Milton Road;
- Baymont Inn & Suites to the south; and
- Woodlands Village Apartments to the west.

Lot 2 is located to the north of Lot 1 and is bounded by Yale Street to the east and University to the south. The remaining two parcels, Tracts A and B are generally situated to the south of Lot 2. Tract A is bounded by University Drive to the north and the Beulah extension to the east, and Tract B is located to the east of Yale Street. All of the Property's parcels are within walking and biking distance to the Northern Arizona University campus, which is approximately a quarter mile to the east along University Drive.

The Property is currently vacant but previously accommodated the Arizona Department of Transportation ("ADOT") northern headquarters—which, along with the Flagstaff Harkins Theater, was relocated by Vintage as part of a three-way private-public partnership ("P3") with the City and the State of Arizona.

III. Project History and Current Proposal

Project History

In 2018, as part of this P3, the Flagstaff City Council approved Direct-to-Ordinance Zoning Map Amendment PZ-16-00239-02, rezoning the Property to its current HC – RPO zoning. Condition No. 1 of this rezone was that the Property had to be developed according to the approved Site Plan for the Property, which included approximately 20,700 square feet of commercial space and 348 dwelling units (the "Approved Plan"). On Lot 1, the Approved Plan grants Vintage the right to construct three commercial pads (including drive-through retail/restaurant use) along Milton Road, and a five-story multifamily residential building with approximately 1,221 beds near Beulah and University Drive. Pursuant to Condition No. 1 of the 2018 rezone, any non-minor modification to the Approved Plan would require a Direct-to-Ordinance Zoning Map Amendment request.

The City Council also authorized the Milltown Development Agreement, which set out the roles and responsibilities of the parties to the P3. Vintage has successfully fulfilled many of its obligations under this agreement by relocating ADOT and Harkins, participating in the Beulah/University Realignment Project, and supporting the City with improvements along Milton Road—including a pedestrian underpass under Milton at the University Drive intersection. In short, Vintage has delivered on its part of the bargain.

Because the Milltown Development Agreement was set to expire, City Council voted to extend and amend it on March 4, 2025. The amendments clarified that any non-minor modifications to the Approved Plan would be reviewed under the version of the Flagstaff Zoning Code in place when the Development Agreement was drafted (the version in effect on May 5, 2017).

Current Proposal

The Approved Plan is large and dense. Applicants are proposing to develop the Property with a more appropriately sized and sustainable development. This proposed development includes reduced density and height compared to the Approved Plan, while still delivering a mixed-use development as envisioned by the City's 2018 approvals. This Project includes:

- Three retail shops/restaurants (\pm 2,000 to 4,200 square feet each) with enhanced architectural features and extended rooflines;
- One specialty supermarket (\pm 13,300 square feet) at the corner of University and Milton;
- 265 apartment units provided in a mix of one-, two-, four-, and five-bedroom units (669 beds) with a density of 21.6 du/ac;
 - Sixty-five (65) one-bedroom units;
 - One-hundred-five (105) two-bedroom units;
 - Eighty-one (81) four-bedroom units;
 - Fourteen (14) five-bedroom units;
- Indoor and outdoor amenities (clubhouse, fitness center, outdoor pool, outdoor dining/seating areas, public civic space, multi-use path); and
- Enhanced multimodal circulation routes (both hard- and soft-surface) throughout the Property, connecting the Project's components with each other and the City's FUTS Trail System.

This new unit mix demonstrates Applicants' commitment to providing well-rounded and diversified housing. The one- and two- bedroom units, which make up roughly two-thirds of the Project's total units, are ideal for both individuals and small families. And the four- and five- bedroom units are well suited for young professionals and students—which will help relieve market pressure on other facets of the City's housing stock.

Primary vehicular access to the commercial component on Lot 1 is planned via a right- and left-in/right-out access point along Milton Road. And primary access to the multifamily residential component is planned along Beulah Boulevard. As a mixed-use development, however, parking for the different components can be accessed from either primary entrance.

Parking for the Project consists of 514 total parking spaces, of which 502 are located on Lot 1, and 12 are located on Lot 2. All 12 parking spaces on Lot 2 are expected to be used primarily for the small retail component of the Project located on the same lot. As described in greater detail in the Project's Parking Demand Study ("PDS") and as shown on this submittal's Site Plan Sheets, of the 502 parking spaces located on Lot 1, there are: (1) 334 residential spaces, and (2) 168 commercial/visitor spaces. The residential spaces will be allocated to residents using a fee model to track and control usage, and to ensure that supply conforms with demand. Any unauthorized vehicles in the resident parking area will be identified and removed by on-site staff. And the shared commercial/visitor parking described in the PDS leverages internal capture and disparate peak demand to minimize the inefficiencies of surface parking sprawl. In addition to this vehicle parking, 136 bike stalls are located on Lot 1, and an added 4 stalls are planned for Lot 2. Toll also intends to provide bike hooks within each dwelling unit to further encourage multimodal transportation.

In sum, the Project will be a cohesive, horizontal mixed-use development that embodies the spirit of urban mountain living. It will help the City achieve its housing goals, while simultaneously

fostering a sense of community by providing public civic space, a mix of uses, and multimodal connectivity.

IV. Request and Required Findings

Applicants request to modify the Approved Plan to allow for the Project's development. And, per Condition No. 1 to the 2018 rezone, this request must satisfy the requirements of a zoning map amendment.

Direct-to-Ordinance Zoning Map Amendments are evaluated based on three findings, enumerated in Flagstaff Zoning Code Section 10-20.50.040.F.1.a. These three findings are listed below, along with a discussion of how the Project satisfies all three.

(1) The proposed amendment is consistent with and conforms to the goals of the General Plan and any applicable specific plans.

Regional Plan Analysis

The Regional Plan designates the Property for large, mixed-use centers with a residential density greater than fourteen dwelling units per acre. The mix of uses should include services, offices, retail, restaurant, residential mixed-use, and public spaces. Except for office space, the Project provides each of these uses, at a density that conforms with the designation of the Regional Plan.

Furthermore, as explained by City Staff in the 2018 Staff Report for PZ-16-00239-02 (zoning the Property HC – RPO), placement of a mixed-use development on the Property furthers many of the Regional Plan's goals. Because the proposed Project is a mixed-use development with many of the same features and amenities as the Approved Plan, it will also further these goals. Some of the most relevant of these goals and policies are discussed below.

Regional Plan Goals and Policies

Goals are organized by Regional Plan 2030's relevant chapters. Language quoted from the 2018 Staff Report is in [blue](#).

Environmental Planning and Conservation & Energy

The Project's focus on multimodal transportation will reduce vehicle miles traveled, and help Flagstaff achieve carbon neutrality, as called for in the Regional Plan. Substantial public bike parking will be available, and the Project's residential component will provide bike hooks in every bedroom. Every resident will also be given an ecoPASS that can be used on Flagstaff's Mountain Line. In conjunction with its proximity to shopping, dining, and educational uses, the Project's focus on multimodal transportation will strongly encourage residents and visitors to harness alternative modes of transportation and reduce greenhouse gas emissions. And Milltown residents with electric vehicles will be encouraged to take advantage of the six dual-port chargers (serving twelve spaces) located strategically throughout the Project.

Furthermore, the Project's buildings—especially the residential component—are designed with efficiency in mind. The residential walls will be well-insulated with a minimum of an R-21 thermal resistance value—well above the minimum for most walls in the City. This will

minimize heat transfer in both cold and hot weather conditions. Cooling (SEER2 minimum) and heating equipment (including Ecobee thermostats with Eco+ capability) will be modern and efficient, and the residential building will meet or exceed bronze-level National Green Building certification standards. Natural gas plumbing will only be for shared outdoor grills, fireplaces, and the community pool as the building is intended to be an “All-Electric, Energy-Efficient Building” within the meaning of Flagstaff Code 10-30.70. Light bulbs will be LED, and provided appliances will be Energy Star (or the reasonable equivalent). Additionally, low-flow faucets (maximum 1.5 gallons per minute) and shower heads (maximum 2 gallons per minute) will be installed in each bathroom along with toilets requiring 1.28 gallons or less per flush.

The Project’s parking provisions are also much more environmentally friendly than those previously approved. In comparison to the Approved Plan—which authorizes a massive parking structure—the Project provides adequate parking without requiring such carbon-intensive construction. This will *dramatically* reduce embodied carbon in the Project.

In short, Milltown will be sustainable in both its construction and operation. It will also promote sustainability along the Milton Corridor more broadly. This is because Milltown prioritizes interconnectivity and access to transit by providing abundant bicycle parking, welcoming pedestrian infrastructure, and a complimentary ecoPASS to each resident—and because the Milton Road pedestrian underpass developed as part of the Milltown P3 and the Project’s proximity to NAU encourage energy-efficient modes of transportation. Because of this, Milltown’s second-order energy savings will extend far beyond the boundaries of the Property.

In addition to energy savings, the Project also preserves other natural resources. Although [\[t\]here were no significant natural resources from the Regional Plan Map 7 identified on this site](#), the Project was nevertheless designed with water and dark-sky conservation in mind.¹ Low flow faucets will be installed in all units and the Project’s landscaping will also use native, drought-tolerant, and regionally appropriate landscape materials. Outdoor lighting will also be appropriately designed and shielded to preserve the City’s dark skies.

Relevant Environmental Planning and Conservation 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.

Relevant Energy Goals and Policies

- **Policy E.1.5.** Promote and encourage the expansion and use of energy-efficient modes of transportation:
 - (1) Public transportation
 - (2) Bicycles
 - (3) Pedestrians
- **Policy E.1.13.** Promote and encourage the use of fuel-efficient vehicles that use renewable fuels.

¹ February 5, 2018 Staff Report for Public Hearing PZ-16-00239-02 [hereinafter “Staff Report”] at 5.

Open Space

This application includes a 1.80 acre tract [Tract A] set aside as open space to provide a buffer between adjacent residential projects and the proposed [primary] building. This open space preserves forest and slope resources for the project and will be open for use by the general public.²

Relevant Open Space Goals and Policies

- **Policy OS.1.3.** Use open spaces as natural environment buffer zones to protect scenic views and cultural resources, separate disparate uses, and separate private development from public lands, scenic byways, and wildlife habitats.
- **Policy OS.1.4.** Use open space as opportunities for non-motorized connectivity, to interact with nature, and to enjoy the views and quiet.
- **Policy OS.1.5.** Integrate open space qualities into the built environment.

Water Resources

The Project respects the City's healthy watershed by implementing low-impact design strategies, including engineered treatment structures prior to discharging to public waterways. Beulah and University roadway runoff is intercepted by storm drain inlets along their respective alignments. The roadway runoff will maintain their existing conditions throughout this Project. The Project onsite runoff will be collected, stored in an underground storage system and discharged at a regulated outfall flow to match existing conditions. Where appropriate, additional low-impact development practices will be used to offset any increase in runoff due to the impervious improvements.

Relevant Open Space Goals and Policies

- **Policy WR.5.7.** Support healthy watershed characteristics through implementation of practices, consistent with the City of Flagstaff Low Impact Design Manual, that improve flood control and flood attenuation, stormwater quality, and water sustainability; increase groundwater recharge; enhance open space quality; increase biodiversity; and reduce land disturbance and soil compaction.
- **Policy WR.6.4.** Encourage low-impact development strategies.

Community Character

The Project will positively contribute to the community character by incorporating Flagstaff's natural beauty into the built environment. And the redevelopment of this vacant site will positively contribute to the community's image. The Project also incorporates the City's design heritage in several ways, including its architectural design and materials palette—which is reminiscent of a rustic alpine village. For example, the Project's main building features a gabled roof form, which accents a largely simple geometry clad in wood siding, stone veneer, and stucco. Heavier materials (i.e., stone veneer) are placed towards the bottom of the main building's façade, whereas lighter materials with smaller textures (i.e., wood siding) are placed towards the top. This evokes some of the historical design traditions of the City. This use of wood and timber-inspired materials, in conjunction with the gabled roofs that echo traditional mill buildings, recognizes and honors Flagstaff's sawmill heritage.

² *Id.*

Milltown's regionally appropriate landscaping and parking design will also positively contribute to the area's community character. Parking is distributed throughout lot one and is largely wrapped with active uses and structures. This creates a defined street edge and masks cars from most primary views. Clear, well-defined pedestrian routes serve as connective tissue throughout the Property. In conjunction with human-scale lighting, these routes recognize pedestrian needs and make Milltown feel welcoming and safe. The preserved forest and slope resources on Tract A also contribute to this welcoming feeling—as well as tie the development to its surroundings using low-impact development principles and by maintaining native vegetation.

Milton Road is classified as a Great Street as well as a Gateway Corridor and is the main entrance to Flagstaff from the south. As stated by the Regional Plan “[d]riving on Milton Road from I-17 sends drivers towards a masterpiece of environmental beauty framed by hodgepodge development and a very busy arterial street.”³ The Site Plan shows how the Project's largest building is set back from Milton in order to preserve sightlines to the “masterpiece of environmental beauty” that is the San Francisco Mountains. There are no historic neighborhoods, existing single-family residential neighborhoods, or cultural resources deemed significant within the vicinity of this project.⁴ In short, Milltown will enhance a major Gateway Corridor with a Flagstaff-centered design that highlights the City's natural beauty.

Relevant Community Character Goals and Policies

- **Policy CC.1.2.** Continue to define and further develop the community character by incorporating the natural setting into the built environment at all design scales.
- **Policy CC.1.4.** Identify, protect, and enhance gateways, gateway corridors, and gateway communities.
- **Goal CC.3.** Preserve, restore, enhance, and reflect the design traditions of Flagstaff in all public and private development efforts.
- **Policy CC.4.4.** Design streets and parking lots to balance automobile facilities, recognize human-scale and pedestrian needs, and accentuate the surrounding environment.
- **Policy CC.4.5.** Encourage local landscaping using Xeriscape, low-impact principles, and native vegetation wherever possible.
- **Policy CC.4.6.** Use landscaping to benefit the environment and improve aesthetics, in order to maximize the economic benefit that a well landscaped community provides.

Growth Areas and Land Use

The preferred land use scenario used for the Regional Plan includes less single-family development and more mixed-use development in the name of sustainability. “Suburban development means more vehicle miles traveled, greater emissions, and greater water demand. More urban-type development results in fewer vehicle miles traveled, fewer emissions, and less water demand.” The Plan promotes concentrated development in or near the city core and in Activity Centers.⁵ The Property is located within overlapping Regional Suburban Activity Centers. The Project, like the Approved Plan, includes public spaces, parks, and plazas, with a mixture of residential and commercial uses, and is designed to incorporate

³ Staff Report at 6.

⁴ *Id.*

⁵ *Id.*

alternative modes of transportation. The Mill[t]own project is considered an infill, redevelopment site. The project provides ample amenities for the public and the residents of the site.⁶ These amenities include a soft-surface trail in the western portion of Milltown, strategically placed seating nodes, and park-like civic space, as well as a pool, sky lounge, and numerous areas to encourage congregation and interaction.

As was the case in 2018, this Activity Center is underutilized. Although the Project (like the Approved Plan) does not include substantial employment opportunities as preferred within an Activity Center, [it] adds the density, intensity, and mix of uses necessary to activate civic spaces and pedestrian environment.⁷

Because Milltown is situated in a Regional Suburban Activity Center, the Regional Plan contemplates relatively intensive “horizontal mixed-use...serving the surrounding neighborhoods.” Although it contemplates uses that “typically tend to be auto-oriented,” the Regional Plan also emphasizes the desirability of shared parking lots and “pedestrian paths through and around parking areas.” As shown on the Site Plan submitted with this Application, Milltown is a horizontal mixed-use development that includes regional-scale commercial uses and mid-block connectivity through and around parking areas. Internally, this connectivity includes circulation between Milltown’s disparate components, as well as a southern pedestrian connection originating at the signalized crosswalk on Beulah and leads to the Project’s primary entrance along Milton. Externally, Lot 1 is bounded by FUTS trails to the west and north, and enhanced walkways to the north and east. And as thoroughly explained in the Milltown PDS, the Project will leverage a shared parking model to reduce car-dependency and, by extension, carbon emissions.

The Project’s Site Plan also shows that Milltown’s residential building is located behind the commercial uses along the Milton frontage. In combination with the provided amenities and nearly two acres of preserved open space, this creates a strong sense of place by layering activity, comfort, and discovery throughout the development site. The soft-surface trail, nearby underpass, and internal connectivity encourage multimodal access to and within Milltown. At the same time, the Project’s seating nodes and generous civic spaces provide inviting points for friends to meet or passers-by to pause and soak in their surroundings. Together, these elements serve to transform what might otherwise be a transactional zone into a destination with a distinctive identity.

As shown on the Project’s commercial elevations, the Milltown identity anchored by the Project’s residential component is echoed by the commercial buildings along the Milton Road frontage. These buildings will complement the sawmill-inspired architecture of the residential component and use materials reminiscent of rustic-industrial alpine towns. The enhanced plantings of native and regionally suited plant material along the Milton Road frontage will further contribute to Milton’s appearance as a “Great Street.”

In short, Milltown will create a strong sense of place—exactly as envisioned by the Regional Plan policies specific to Activity Centers. Furthermore, as an infill redevelopment project that

⁶ *Id.*

⁷ *Id.*

facilitates added connectivity throughout the City, Milltown will energize this Activity Center and spur economic investment in the surrounding area.

Relevant Growth Areas and Land Use Goals and Policies

- **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.5.3.** Promote compact development appropriate to and within the context of each area type: urban, suburban, and rural.
- **Policy LU.6.1.** Consider a variety of housing types and employment options when planning new development and redevelopment projects.
- **Policy LU.6.3.** Encourage new mixed-use neighborhoods in appropriate locations within the growth boundary.
- **Policy LU.13.4.** Plan suburban development to include a variety of housing options.
- **Policy LU.13.6.** Include a mix of uses and access to surrounding neighborhoods in new suburban commercial development.
- **Policy LU.18.2.** Strive for activity centers and corridors that are characterized by contextual and distinctive identities, derived from history, environmental features, a mix of uses, well-designed public spaces, parks, plazas, and high-quality design.
- **Policy LU.18.3.** Redevelop underutilized properties, upgrade aging infrastructure, and enhance rights-of-way and public spaces so that existing activity centers and corridors can realize their full potential.
- **Policy LU.18.4.** Encourage developers to provide activity centers and corridors with housing of various types and price points, especially attached and multi-family housing.
- **Policy LU.18.6.** Support increased densities within activity centers and corridors.
- **Policy LU.18.10.** Corridors should increase their variety and intensity of uses as they approach activity centers.
- **Policy LU.18.12.** Corridors should focus commercial development to the corridor frontage and residential to the back.

Transportation

Mill[t]own, as part of the P3 Project, is designed to incorporate citywide transportation improvements for vehicles, pedestrians, bicycles, and transit that increase network connectivity for all modes. This project will result in an alternative north/south connection [Beulah] other than Milton Road, which is a heavily congested corridor. The realignment of University Avenue will increase safety for vehicles and alternative modes of transportation by eliminating a disjointed intersection. The developer's addition of a pedestrian underpass across Milton Road will enhance pedestrian and bicycle safety at an already heavily used intersection. The Project can be efficiently served by local transit with the hope that higher level transit improvements can be added to the transportation improvements. All of these features work in concert to provide new "complete streets" within the City of Flagstaff transportation network. Activity Centers are meant to be pedestrian and transit oriented and this project meets both of those criteria in terms of design and the associated improvements.⁸

Furthermore, Milltown is conceptualized as a transit-oriented development that applies "complete street" guidelines to accommodate all modes of travel. As shown on the Project's Circulation Plan, Milltown provides multimodal connectivity with walking and biking infrastructure along Milton Road, University Avenue, Beulah Boulevard, and throughout the site. This infrastructure is fully integrated into the existing and planned FUTS system, and—critically—connects with the Milton Road underpass provided by Applicants as part of the

⁸ *Id.*

Milltown P3. Its connectivity is enhanced by the Project's proximity to transit (and complimentary EcoPass for residents), which will increase usage and decrease congestion, fuel consumption, and carbon emissions.

Critically, Milltown supports Flagstaff's goal of managing parking supply. As discussed, the P3 project increased transportation connectivity for all modes of transport—resulting in a reduction in parking needs. Additionally, Milltown leverages internal capture and disparate peak demand to minimize the inefficiencies of surface parking sprawl via a shared parking model.

Relevant Transportation Goals and Policies

- **Policy T.3.4.** Actively manage parking, including cost and supply, to support land use, transportation, and economic development goals.
- **Policy T.3.8.** Promote transportation options such as increased public transit and more bike lanes to reduce congestion, fuel consumption, and overall carbon emissions and promote walkable community design.
- **Policy T.4.2.** Design all gateway corridors, streets, roads, and highways to safely and attractively accommodate all transportation users with contextual landscaping and appropriate architectural features.
- **Policy T.5.1.** Provide accessible pedestrian infrastructure with all public and private street construction and reconstruction projects.
- **Policy T.6.2.** Establish and maintain a comprehensive, consistent, and highly connected system of bikeways and FUTS trails.
- **Policy T.6.4.** Encourage bikeways and bicycle infrastructure to serve the needs of a full range of bicyclist experience levels.

Neighborhoods, Housing, and Urban Conservation

NAU students make up approximately 25% of the City's population. The student population's increasing demand for housing impacts the cost and availability of housing in the region, which results in a higher demand for multi-family housing.⁹ The Project provides 669 beds within walking distance of NAU, which will naturally attract student tenants—decreasing their demand for multifamily housing located farther away from campus and increasing housing in other parts of the City for other community members. Additionally (and unlike the Approved Plan) the Project provides a balanced mix of multifamily housing types and helps fill the need for workforce housing. More specifically, almost 65% of the Project's dwelling units are one- or two-bedroom units, with sixty-five (65) one-bedroom apartments and one-hundred-five (105) two-bedroom apartments. As an infill development, the Project also [make\[s\] use of an existing underutilized site as encouraged by the Regional Plan](#).¹⁰

Importantly, the residents of Milltown will live within one half mile of grocery stores, big-box retailers, restaurants, a post office, a place of worship, and medical services (dentist, urgent care). This ease of access meets the needs of Flagstaff residents from a financial and lifestyle perspective—and promotes sustainability in day-to-day life.

Relevant Neighborhoods, Housing, and Urban Conservation Goals and Policies

⁹ Staff Report at 7.

¹⁰ *Id.*

- **Policy NH.3.1.** Provide a variety of housing types throughout the City and region, including purchase and rental options, to expand the choices available to meet the financial and lifestyle needs of our diverse population.
- **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.

Economic Development

The Mill[t]own development is a prime example of redevelopment of an underutilized property [located in the City's southern gateway on the Milton corridor] designed to accomplish regional transportation improvements within a designated Activity Center.¹¹

Relevant Economic Development Goals and Policies

- **Policy ED.7.4.** Invest in attractive community gateways, main corridors, and public spaces to draw the business and workforce the region desires.
- **Goal ED.9.** Promote redevelopment and infill as a well-established means to accomplish a variety of community economic, planning, and environmental goals.

Recreation

Development projects are encouraged to integrate active and passive recreation sites into their design. The Mill[t]own project provides several locations for both types of recreation. Private and public open spaces have been incorporated into the project boundaries. Ample civic space is provided to enhance the public and commercial component of this mix-use development.¹²

Relevant Recreation Goals and Policies

- **Policy Rec.1.1.** Integrate active and passive recreational sites within walking distance throughout the region to promote a healthy community for all City and County residents and visitors.
- **Policy Rec.1.2.** Promote public and private partnerships to offer parks, recreation facilities, and resources.

Policy Assessment

In addition to discussing the goals of the Regional Plan, the City also requests an assessment of some of the policies supported—and not supported—by approval of this Application. Applicants strive to meet the goals and policies of the Regional Plan, and the Project recognizes the importance of cooperation between public interest and private development. Though the Project meet most of the Regional Plan's goals and Policies, parts of the Regional Plan simply do not apply to the project—or the overall intent of the goal is met, but certain policy details cannot practicably be met. The following list provides a sample of some of the supported and unsupported policies (in addition to those listed above). Language quoted from the 2018 Staff Report is in blue.

Supported Policies

¹¹ *Id.*

¹² *Id.*

- The property is considered redevelopment, is within the Urban Growth Boundary, and can be efficiently and effectively provided with facilities and services by the City.
- The project will provide open space amenities and extensions of the FUTS in addition to a pedestrian underpass across Milton Road.
- Adding high density residential to an Activity Center where the character is currently commercial.¹³
- The project provides a balanced mix of multifamily housing.

Unsupported Policies

- The project does not include residential or office uses over the commercial buildings fronting the Milton Road corridor.
- The project does not include employment type uses within this Activity Center.¹⁴

Specific Plan Analysis

No specific plans apply to the Property because it does not fall within the geographic boundaries of any area plans. And the Project falls outside the scope of Flagstaff's only city-wide specific plan, the High Occupancy Housing ("HOH") Specific Plan because it only has ±21.3 du/ac and ±54.4 beds/ac—and the HOH Specific Plan defines HOH projects as having more than 30 du/ac or more than 75 beds/ac.

Even so, just like 2018, [staff worked with the applicant\[s\] to integrate as many of the strategies as possible into the proposed development.](#)¹⁵ Like the Approved Plans, the current proposal also integrates recycling into the development for better waste management, and the site remains [a preferred location for high occupancy housing projects.](#)¹⁶

(2) The proposed amendment 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.

The Project directly advances the City's long-range vision by concentrating housing and service in an already urbanized corridor. This adds to the public good by reducing sprawl, improving multimodal connectivity, and leveraging the infrastructure improvements provided by the Milltown P3.

Further, the Project's density and unit mix bolster Flagstaff's housing stock and provide a variety of multifamily housing options, while simultaneously respecting the Milton Gateway Corridor community. This promotes housing attainability. The Project's pedestrian-oriented streetscape also supports transit and active transportation. This reduces vehicle miles traveled and supports the City's climate action objectives, both of which directly benefit public health and welfare.

Additionally, the proposed version of Milltown improves upon the Approved Plan in several ways. The residential component now has 63% fewer three-or-more-bedroom units than the

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

Approved Plan and has approximately 24% fewer units overall. And the current proposal's maximum height is less than sixty feet, as opposed to the nearly one-hundred feet originally proposed. These difference make the Project more contextual with the surrounding neighborhood than the previously Approved Plan.

Finally, the Project is consistent and compatible with the surrounding zoning districts (HC and HR) and uses. More precisely, the Project integrates into the area's fabric by providing a mixed-use transition between the HC districts to the north, south, and east, and the HR district to the west. In short, not only will the Project *not* be detrimental, but it will also actively support the public interest, health, safety, convenience, and welfare of the City and its residents.

(3) The affected site is physically suitable in terms of design, location, shape, size, operating characteristics and the provision of public and emergency vehicle (e.g., fire and medical) access and public services and utilities (e.g., fire protection, police protection, potable water, schools, solid waste collection and disposal, storm drainage, wastewater collection, treatment, and disposal), to ensure that the requested zone designation and the proposed or anticipated uses and/or development will not endanger, jeopardize or otherwise constitute a hazard to the property or improvements in the vicinity in which the property is located.

The Property's characteristics are perfectly suited for the Project, and the Project will experience no issues with public service or utility access. This is because the Project is *less dense* and *less intensive* than the Approved Plans—and the City previously found that the Approved Plans were appropriate for the Property.

Specifically, the City determined that: (1) nearby intersections would either continue operating “at acceptable service levels with the development in place,” or that the “proposed development will have little impact;” (2) “the proposed development . . . has the ability to be served by City water and sewer, utilities;” and (3) that “the Mill[t]own site will meet the mitigation and water quality requirements.” At bottom, because the Project is simply a right-sized version of the Approved Plans, it is necessarily suitable for the Property.

V. Conclusion

Applicants are committed to delivering a transformative project that meets Flagstaff's growing need for quality housing and vibrant commercial space. As described in greater detail in Applicants' Development Agreement Amendment Application, Applicants are also committed to delivering off-site affordable housing as part of this Project. The Project's focus on multimodal transportation will result in fewer cars on the road, and its provision of desirable retailers will benefit area residents. Furthermore, the Project offers a greater diversity of housing types in a less intense footprint than the Approved Plans. Toll and Vintage are confident that this Project will become a valuable asset to the Flagstaff community and respectfully request the City's favorable review and approval of this Application.