

PLANNING AND DEVELOPMENT SERVICES REPORT
CONCEPT ZONING MAP AMENDMENT

PUBLIC HEARING
PZ-24-00235-01

DATE: July 22, 2026
MEETING DATE: August 12, 2026
REPORT BY: Bethan Heng

REQUEST:

A Concept Zoning Map Amendment requested by Art Babbott/El Paso Rd Land, LLC, of approximately 23.89 acres located at 2661 N El Paso Flagstaff Road, APN 113-37-010 from the Highway Commercial (HC) zone with the Resource Protection Overlay (RPO) to Heavy Industrial – Open (HI-O) zone with the RPO. The applicant is requesting a rezone for the purpose of allowing Construction Storage/Supply Yard and Heavy Manufacturing/Processing uses on site.

STAFF RECOMMENDATION:

Staff believes that the proposed Zoning Map amendment is in substantial conformance with the required findings and recommends the Planning & Zoning Commission forward the request to the City Council with a recommendation for approval, subject to the following conditions:

1. The subject property must be developed in accordance with the approved concept plan and conditions of approval dated June 23, 2026. Modifications may require a revised concept plan.
2. All other requirements of the Zoning Code and other City codes, ordinances, and regulations shall be met by the proposed development.
3. That final plat parcel boundaries align with the zoning districts legal descriptions.
4. The Flagstaff Urban Trail System (FUTS) alignment shall be finalized at Civil Plan Review and prior to Final Plat approval.
5. In the event the property is rezoned, and the applicant fails to obtain final Civil Plan approval within two (2) years of the effective date of the rezoning ordinance, then the City may schedule a public hearing before the City Council for the purpose of causing the zoning on the Property to revert to the former classification of Highway Commercial (HC) in accordance with A.R.S. § 9-462.01.

PRESENT LAND USE:

The existing parcel is 54.08 acres. Approximately 23 acres are being set aside for Flagstaff City use. A Direct to Ordinance Zoning Map Amendment was approved in 2022 for 7.29 acres, rezoning it from HC to HI-O to allow a Composting Facility use. The remaining 23.89-acre portion of the parcel is currently undeveloped land and is the subject of this Concept Zoning Map Amendment.

PROPOSED LAND USE:

The applicant proposes to establish Construction Storage/Supply Yard and Heavy Manufacturing/Processing uses on site, which are permitted uses in the HI-O zone.

NEIGHBORHOOD DEVELOPMENT:

See the attached area context map.

North: Heavy industrial land owned by United Metro Materials Inc., zoned HI-O
East: City of Flagstaff wastewater treatment plant, zoned Public Facility (PF)
South: State Trust Land, zoned Rural Residential (RR); Nestle Purina factory, zoned Light Industrial (LI); BNSF rail lines and Interstate 40
West: ADOT maintenance yard, zoned HC

I. **Project Introduction**
A. **Background/Introduction**

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The applicant, Art Babbott/El Paso Rd Land, LLC, is requesting a Concept Zoning Map Amendment for a 22.9-acre portion of the parcel from the HC zone with the RPO to the HI-O zone with the RPO, located at 2661 N El Paso Flagstaff Road. The applicant is requesting a rezone for the purpose of allowing Construction Storage/Supply Yard and Heavy Manufacturing/Processing uses on the site.

The subject property is located near the eastern border of the City Limits, off Route 66. Primary access to the site is from N El Paso Flagstaff Road.

The 22.9 acres being set aside for Flagstaff City use contains rural floodplain and steep slopes. There are also City sewer and reclaimed water lines. This area will include a new FUTS connection. A Direct to Ordinance Zoning Map Amendment was approved in 2022 for 7.29 acres, rezoning it from HC to HI-O to allow a Composting Facility use.

B. Proposed Rezoning and Development Plan

II. Site Plan

On June 23, 2026, the Inter-Department Staff (IDS) approved the Site Plan and deemed the rezoning application to be complete.

A. Zoning – City of Flagstaff Zoning Code

If this Concept Zoning Map Amendment request is approved, Construction Storage/Supply Yard and Heavy Manufacturing/Processing uses will be allowed on the site. Development of the site will be required to comply with the standards of the Zoning Code.

i. Site Planning Standards

These standards do not apply to Industrial uses.

ii. Resource Protection

There is a Resource Protection Overlay zone on the subject site. The site contains rural floodplain and steep slopes. If this rezoning is approved, staff will ensure compliance with the Zoning Code during Civil Plan review.

iii. Open Space & Civic Space

The proposed uses do not require either open space or civic space.

iv. Pedestrian and Bicycle Circulation Systems

There is a proposed future FUTS trail alignment for the Picture Canyon Trail on this site. The final alignment of the FUTS will be determined at the Civil Plan review.

v. Compatibility and Architectural Design Standards

The proposed Zoning and land uses are similar and compatible with the surrounding uses. The architectural design standards do not apply to the proposed Industrial uses.

vi. Landscaping

As future development applications are submitted, staff will apply the required landscaping standards.

vii. Outdoor Lighting

The subject property is located within Lighting Zone 2. An outdoor lighting permit for any outdoor lighting will be required as a separate submittal and is not required as part of this application.

viii. Parking

As future development applications are submitted, staff will apply the required parking standards.

ix. Historic/Cultural Resources

The Heritage Preservation Officer has determined that no analysis of the site is required.

B. Public Systems Impact Analysis

i. Traffic/Right-of-Way Impact

A Traffic Statement was sealed on December 15, 2025, and approved on January 23, 2026. Four driveways are proposed for the project, connecting the site to N El Paso Flagstaff Rd and Route 66. Based on the safety considerations, traffic volumes, and roadway functional classification documented in the Traffic Statement, a left-turn lane on Route 66 at N El Paso Flagstaff Road is warranted and shall be constructed by the project. A right turn deceleration lane was not warranted by the project.

ii. Water and Wastewater Impact

A Water and Sewer Impact Analysis (WSIA) was completed on July 29th, 2025, and approved by city staff. Since there is no water or sewer infrastructure currently onsite to support this development, all systems will need to be designed and built. Existing water off-site infrastructure adjacent to this project includes an 8" waterline underneath El Paso Flagstaff Rd and a 12" waterline within the Route 66 right-of-way. No off-site improvements are required prior to connecting the site to the existing water system. The WSIA's Exhibit 1 shows 8" water connection locations for the proposed development, including fire hydrants to provide fire protection water sources to future proposed parcels.

There is currently a 30" sewer trunkline (Rio De Flag) that runs along the west and north portion of the property, which can be utilized for sewer service. In order to provide adequate downstream capacity, offsite sewer improvements will be required on the Rio de Flag trunkline near the Wildcat Treatment Plant. The design and funding of this upgrade is the responsibility of the City of Flagstaff. This project includes replacing the 30" existing main with a new 48" sewer main. This off-site improvement must be completed prior to connecting to the existing system. El Paso Industrial Park's connection to the sewer system is contingent on the successful completion of the trunkline improvement.

iii. Stormwater Analysis

A Preliminary Drainage Report and Stormwater Impact Analysis (SIA) was prepared June 3, 2025, and approved by City Staff on April 27, 2026. This report identified existing and proposed drainage patterns to be finalized at the future Civil Plan review phase of the project.

III. Zoning Map Amendment Direct to Ordinance

An application for a Zoning Map Amendment shall be submitted to the Planning Director and shall be reviewed and a recommendation prepared. The Planning Director's recommendation shall be transmitted to the Planning and Zoning Commission in the form of a staff report prior to a scheduled public hearing. The recommendation shall include: an evaluation of the consistency and conformance of the proposed amendment with the goals and policies of the General Plan and any applicable specific plans; the grounds for the recommendation based on the standards and purposes of the zones set forth in Section 10-40.20 (Establishment of Zones) of the Zoning Code; and whether the amendment should be granted, granted with conditions to mitigate anticipated impacts caused by the proposed development, or denied.

Concept Zoning Map Amendments shall be evaluated based on the following findings:

A. Finding #1:

The proposed amendment must be found to be consistent with and in conformance with the goals and policies of the General Plan and any applicable specific plans. If the application is not consistent with the General Plan, and any other applicable specific plan, the applicable plan must be amended in compliance with the procedures established in Chapter 11-10 of the City Code (Title 11: General Plans and Subdivisions) prior to considering the proposed amendment.

This Concept Zoning Map Amendment (CZMA) application was found "complete" on April 8th, 2026, prior to the ratification date of the current 2045 Regional Plan on May 19th, 2026. This CZMA application was reviewed under the 2030 Regional Plan.

i. **General Plan/Flagstaff Regional Plan (FRP 2030) Process and Analysis Summary**

When staff performs a Regional Plan (the “Plan”) analysis, staff reviews all maps, text, and goals and policies to determine which are the most relevant in relation to the proposed application. The Plan’s Future Growth Illustration on Maps 21 and 22 (same map; one is regional scale and one city scale) and the text of the Plan provide supplemental information for the interpretation of goals and policies. In the case of any conflict between the Future Growth Illustration and the Plan’s goals and policies, the goals and policies will prevail. The Future Growth Illustration has two types of land use designations: “Area Types” describe the place-making context of Urban, Suburban, Rural, or Employment, and “Place Types” such as activity centers, corridors, and neighborhoods provide the framework for the density, intensities, and mix of uses within the area types.

The subject property is designated as Future Employment area type in the 2030 Regional Plan. An Employment Center may include mixed- use; research and development offices; medical offices; office space; business park; retail, restaurant, and tourism center; light-industrial; heavy-industrial; and live-work spaces. The proposed uses of Construction Storage/Supply Yards and Heavy Manufacturing/Processing allows the City to work further towards establishing the area as a place for Industrial uses – bringing the area in compliance with the Regional Plan.

ii. **Applicable General Plan Goals and Policies**

As part of its review, staff identified relevant Regional Plan Goals and Policies that could be applied to support or not support the proposed Zoning Map Amendment. The relevant goals and policies can be found below and within the developer’s narrative. This application utilizes the original Regional Plan Analysis provided by the applicant during the original Direct to Ordinance Zoning Map Amendment from April 2024. The following is a discussion of how the current application generally meets or conflicts with goals and policies in each relevant chapter.

a. **Environmental Planning & Conservation (Air Quality, Climate Change and Adaptation, Dark Skies, Ecosystem Health, Environmentally Sensitive Lands, Natural Quiet, Soils, and Wildlife)**

Goal E&C.1. aims to proactively improve and maintain the region’s air quality. The proposed use of manufacturing and heavy processing will be required to have an Arizona Department of Environmental Quality (ADEQ) for air quality monitoring, as well as be required to adhere to Method 9 compliance from ADEQ.

Policy E&C.1.2. Pursue reduction of total emissions of high-priority pollutants from commercial and industrial sources and area-wide smoke emissions. The applicant anticipates that smoke pollution emitted by project will be little to none.

Policy E&C.1.3. Encourage strategies and partnerships to mitigate dust. The applicant intended to employ best management practices to monitor and mitigate dust.

Policy E&C.1.4. Maintain air quality through pursuit of non-polluting industry and commercial enterprises. The applicant anticipates that the emissions generated by the new zoning will be less than what is produced in the current zoning.

b. **Water Resources (Water Sources, Water Demand, Stormwater and Watershed Management, and Water Quality)**

Goal WR.4. aims to logically enhance and extend the City’s public water and wastewaters services including their treatment, distribution, and collection systems in both urbanized and newly developed areas of the City to provide an efficient delivery of services. Policy WR.4.3. aims to development requiring public utility services will be located within the Urban Growth Boundary. This application’s proposed land uses are low-water uses and will utilize reclaimed water. A Water and Sewer Impact Analysis (WSIA) has been completed by the City of Flagstaff for this site.

Goal WR.5. required managing watersheds and stormwater to address flooding concerns, water quality, environmental protections, and rainwater harvesting. Policy WR.5.4. similarly aims to develop any necessary stormwater infrastructure improvements consistent with City of Flagstaff stormwater master plans or studies as adopted by the City. In conformance with the City of Flagstaff Stormwater Management Design Manual (SMDM), the proposed development will be designed to continue this historical drainage pattern, and drainage basins will be provided for each lot for the pre vs. post volumetric retention to mitigate impacts to downstream properties. LID ROCV retention will also be provided in each of the basins per the City of Flagstaff Low Impact Development (LID) Manual. Due to the topographic nature of the site, regional basins cannot be used. Refer to the Preliminary Drainage Report for more information.

Goal WR.6. aims to protect, preserve, and improve the quality of surface water, groundwater, and reclaimed water in the region. Policy WR.6.3. likewise directs implementation of best management practices to protect, restore, and maintain surface waters and their contributing watersheds. Note: Refer to best management practices adopted by the Arizona Department of Environmental Quality at <http://www.adeq.gov>. The Project will implement the appropriate SWPPP measures for short-term construction and for the long-term existence of the development to protect the downstream Rio de Flag. The Project will also meet all the requirements of the City low-impact development standards.

c. Energy (Energy Efficiency and Renewable Energy)

Goal E&C.2. aims to achieve carbon neutrality for the Flagstaff community by 2030, and Policy E&C 2.4. aims to promote developments that help the community achieve carbon neutrality through strategies that reduce the project's emissions from transportation, energy, and consumption. The intended use of construction storage will allow local companies to store their equipment and materials within City limits instead of traveling to adjacent communities for storage, reducing the potential emissions within the town.

Policy E&C.3.1. aims to develop and implement a comprehensive and proactive approach to prepare the community for and to minimize the impacts of climate change induced hazards. The intended heavy manufacturing and processing use for the site is a concrete and asphalt material recycling facility. The reused of these material is a sustainable practice of reusing materials, rather than sourcing new and raw materials, to be reutilized in the community.

Goal E&C.4. aims to integrate available science into policies governing the use and conservation of Flagstaff's natural resources. In addition, Goal E&C.3. aims to prepare Flagstaff's community systems and resources to be more resilient to climate change impacts, and address climate change in a manner that prioritizes those most impacted and ensures the costs and benefits of climate adaptation and mitigation are equitably distributed. This CZMA application is in conjunction to a plat application in process under staff review. This plat aims to separate the Rio de Flag within the subject property to be dedicated to the City of Flagstaff. By doing so, this resource may be conserved and protected as a natural resource.

Goal E.1. aims to increase energy efficiency and Policy E.1.1. aims to promote and encourage innovative building practices through instruction on efficient building materials and methodology. El Paso Industrial Park will meet all energy efficiency standards per the City of Flagstaff Building Code.

d. Growth Areas & Land Use (Reinvestment, Greenfield, Urban Area, Suburban Area, Rural Area, Employment Area, Special Planning Area, and Activity Centers)

Goal LU.7. aims to provide for public services and infrastructure and Policy LU.7.1. requires concentration of urban development in locations that use land efficiently, and are served by roads, water, sewer, and other public facilities and services, and that support transit, reduced vehicle trips, and conservation of energy and water. El Paso Industrial Park is situated in an area where a concentration of industrial uses exists. In addition, existing roadway and utility

infrastructure while being able to set aside land for the preservation of scenic views, the Rio de Flag, and recreational uses.

Policy LU.6.2. requires consideration toward commercial core areas, corridors, activity centers, employment centers, research and development parks, special planning areas, and industrial uses as appropriate place types and area types for employment opportunities. The proposed uses of construction storage/supply yards and heavy manufacturing/processing on site allows for future employment opportunities.

e. Transportation (Mobility and Access, Safe and Efficient Multimodal Transportation, Environmental Considerations, Quality Design, Pedestrian Infrastructure, Bicycle Infrastructure, Transit, Automobile, Passenger Rail and Rail Freight, Air Travel, and Public Support for Transportation)

Policy OS.1.4. aims to use open space as opportunities for non-motorized connectivity, to interact with nature, and to enjoy the views and quiet. Goal OS.1. The region has a system of open lands, such as undeveloped natural areas, wildlife corridors and habitat areas, trails, access to public lands, and greenways to support the natural environment that sustains our quality of life, cultural heritage, and ecosystem health. In addition to conservation of the Rio de Flag, the project offers approximately 3,700 linear feet of new FUTS trail along the east and west banks of the Rio de Flag to provide continuity to a planned FUTS trail within the natural environment provided by the subject parcel. This also include a future trailhead and parking area of non-motorized access to the Rio de Flag and Picture Canyon.

Policy WR.5.2. requires incorporating pedestrian access, trails, and watchable wildlife opportunities into natural watercourses when practical. In addition to the area identified for Open Space and FUTS acquisition, El Paso Rd Land, LLC. is also in preliminary discussions with the City about locating a trailhead and parking area for non-motorized access to the Rio de Flag and Picture Canyon area.

Goal T.1. aims to improve mobility and access throughout the region. Similarly, Policy T.1.1. requires integrating a balanced, multimodal, regional transportation system and Policy T.1.3. requires a transportation system that is consistent with the place type and needs of people. The subject property will have access off N. El Paso Flagstaff Rd, which is a private road currently serving the City Wastewater Treatment Facility, Picture Canyon, Kinder Morgan, Cemex and a secondary access to Coconino County Public Works. As part of the City of Flagstaff development process, a Traffic Study has been conducted that analyzes the traffic impacts of the development of the HI-O portion of the site. The applicant believes that the application is effectively a “down-zoning,” as the traffic generation patterns and utility impacts for HI-O permitted uses are significantly lower in intensity than that of the HC zones that are currently planned on this site per the City Regional Plan. North El Paso Flagstaff Road is an unclassified road with limited traffic and little to no pedestrian or bicycle traffic and will not be adversely impacted by this project. The proposed development is estimated to generate under 100 peak hour trips. The traffic analysis and statement evaluated the existing roadways in the vicinity for turn lane warrants based on sight distance requirements and crash analysis data.

Goal T.2. requires improvement of transportation safety and efficiency for all modes. Likewise, Policy T.2.1. aims to design infrastructure to provide safe and efficient movement of vehicles, bicycles, and pedestrians. Shoulders are provided along El Paso Flagstaff Road and FUTS trail is proposed along the banks of the Rio de Flag for pedestrian and bike traffic while Route 66 and El Paso Flagstaff Road will serve vehicles. Additionally, a dedicated eastbound left turn lane will be provided along Route 66.

Goal T.5. aims to increase the availability and use of pedestrian infrastructure, including FUTS, as a critical element of a safe and livable community. Similarly, Policy T.6.2. aims to establish and maintain a comprehensive, consistent, and highly connected system of bikeways and FUTS trails. The Project will provide approximately 3,700 linear feet of new FUTS trails along the banks of the Rio de Flag for pedestrian access to Picture Canyon.

f. Neighborhoods, Housing, and Urban Conservation

This section does not apply to this application.

g. Economic Development

Goal ED.7. aims to continue to promote and enhance Flagstaff's unique sense of place as an economic development driver. The applicant believes that Flagstaff needs a greater inventory of Heavy Industrial uses as permitted in the City of Flagstaff Zoning Code Table 10-40B.30.050. By increasing the availability of Heavy Industrial land in an appropriate and low land use conflict area, this application contributes to adding further industrial land into Flagstaff's inventory of industrial-zoned properties.

B. Finding #2

To meet the finding, the proposed amendment must be determined not to be detrimental to the public interest, health, safety, convenience, or welfare of the City of Flagstaff (the "City") and will add to the public good as described in the General Plan.

Staff believes that the proposed project will not be detrimental to the public health, safety, or welfare so long as it is developed in accordance with all codes and requirements.

Staff believes that the proposed project will contribute to the public good and benefit the larger community. Establishing the site as a Heavy Industrial – Open (HI-O) for the purpose of Construction Storage/Supply Yards and Heavy Manufacturing/Processing uses will contribute to additional supply of industrial land to the City of Flagstaff real estate market.

The rezone application and the intention to plat this subject property later will allow future industrial uses within City jurisdiction, which lends to the intentional placement of future land uses within the City. The subject property is surrounded by similar heavy industrial uses - the City of Flagstaff Wildcat Wastewater Treatment Facility on the east the Cemex Cement Plant and Coconino Public Works to the north, the Arizona Department of Transportation equipment yard to the west, and the BNSF Railroad to the south (south of Route 66). This application mindfully places similar land uses within the City.

This application intends to preserve the existing zoning of the extent of Rio de Flag on the property, keeping it Highway Commercial (HC) and later dedicating the Rio de Flag to the City of Flagstaff. The applicant believes that by doing so, the natural environment and resources will be preserved on site.

El Paso Industrial Park 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 Regional Plan. El Paso Industrial Park also promotes the clustering of heavy industrial uses. Emergency vehicle access, public service, and infrastructure and utilities exist or will be provided to ensure that El Paso Industrial Park does not have a detrimental impact

C. Finding #3

To meet the finding, the affected site must be determined to be physically suitable in terms of design, location, shape, size, and operating characteristics; and the provision of public and emergency vehicle access, public services, and utilities must 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.

Staff believes that the proposed application meets this finding. The Inter-Division Staff reviewed the application and concluded that the site was suitable for the proposed development. The IDS team based its conclusion on the review of all applicable codes and requirements.

IV. Citizen Participation

Public hearings before the Planning and Zoning Commission and City Council are conducted in conjunction with

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requests for Zoning Map Amendments. In accordance with Arizona State Statute, notice of the public hearing was provided by placing an ad in the Arizona Daily Sun, posting notices on the property, and mailing a notice to all property owners within 600 feet of the site excluding rights-of-ways.

The applicant held two neighborhood meetings via Microsoft Teams regarding this case. The first meeting was held virtually on May 26th, 2026. The meeting was attended by the applicant's team and had no attendees. Initially, the applicant had requested for the second neighborhood meeting to be waived, which the Planning Director approved. However, staff later realized that Section 10-20.30.070 for Additional Requirements for Citizen Outreach required that the second neighborhood meeting be held. This section for additional citizen outreach applies to this project because it is an industrial development that exceeds 20 acres. The second meeting was held virtually on July 21st, 2026. The meeting was attended by the applicant's team and had no attendees.

Staff has not received any comments from the public as of the writing of this report.

STAFF RECOMMENDATION:

Staff believes that the proposed Zoning Map amendment is in substantial conformance with the required findings and recommends the Planning & Zoning Commission forward the request to the City Council with a recommendation for approval, subject to the following conditions:

1. The subject property must be developed in accordance with the approved concept plan and conditions of approval dated June 23, 2026. Modifications may require a revised concept plan.
2. All other requirements of the Zoning Code and other City codes, ordinances, and regulations shall be met by the proposed development.
3. That final plat parcel boundaries align with the legal descriptions for where the zoning districts change.
4. The Flagstaff Urban Trail System (FUTS) alignment be finalized at the point of Civil Plan Review and prior to final plat approval.

Attachments:

- Application
- Project Narrative and Regional Plan Analysis
- Legal Description
- Site Plan
- Vicinity Map
- Neighborhood Meeting Plans
- Record of Proceedings
- WSIA
- Traffic Impact Statement
- Preliminary Drainage Report