



**PROJECT NARRATIVE
For
EL PASO INDUSTRIAL PARK
CONCEPT ZONING AMENDMENT SUBMITTAL**

Ardurra Project #225068

Northeast Quarter of Section 8, Township 21N, Range 8E, G&SRM
Coconino County, Flagstaff, Arizona

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INTRODUCTION

El Paso Rd Land, LLC is proposing a new Industrial Subdivision located at the northwest corner of the intersection of East Route 66 and North El Paso Flagstaff Road. The purpose of this narrative is to summarize and address the City of Flagstaff submission requirements for the Concept Zoning Map Amendment application.

EXISTING SITE

The subject property is located on the northwest corner of the intersection of East Route 66 and North El Paso Flagstaff Road. The 54.08-acre parcel was formerly State Trust Land brought to auction by the Arizona State Land Department in 2024 and acquired by El Paso Rd Land, LLC.

The Property is currently, primarily zoned Highway Commercial (HC) with 7.29 acres zoned Heavy Industrial Open (HI-O), and is surrounded by other parcels zoned HC and HI-O. The Property borders the City of Flagstaff Wildcat Wastewater Treatment Facility on the east, the Cemex Cement Plant and Coconino County 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). North El Paso Flagstaff Road borders the property to the east, and serves a small trailhead parking area with 16 spaces at Picture Canyon. This road is for access only and does not continue beyond the existing developments to the north (Coconino County Public Works and El Paso Natural Gas). No through traffic is intended to use N El Paso Flagstaff Road.

Land use in the surrounding area includes materials processing & sales, postal facility, wastewater treatment plant, automotive services, maintenance and towing yards, and manufacturing plants.

The subject parcel is of irregular shape and currently undeveloped, with low tree cover and considerable steep slope resources. A reach of the Rio De Flag runs generally north-south through the property. An existing sewer line and reclaimed water line lie within the Rio De Flag floodplain. There are also various electric lines and easements that run both north-south and northwest-southeast through the property. Existing water mains are located adjacent to the site in both Route 66 and El Paso Flagstaff Rd.

Cultural resource sites are present within the Property. In December 2024, a historic properties treatment plan (HPTP) was prepared to discuss the management of cultural resources during site development. The document was revised most recently in June 2025.

PROPOSED ZONING AND USE

El Paso Rd Land LLC proposes the creation of an Industrial Subdivision on the subject parcel. The parcel will be subdivided through the platting process and in accordance with City of Flagstaff Engineering requirements. A total of eight lots will be created from the overall property with a total net area of approximately 53.19 acres. Parcel "H" (22.9 acres) that contains a portion of the Rio de Flag will be sold to the City of Flagstaff and the remaining seven lots will be rezoned to HI-O, totaling approximately 30 acres. The proposed zone changes match the

existing zoning in the adjacent area. The proposed land use for the seven HI-O lots will include heavy manufacturing and processing, compost facilities, construction storage, and supply yards. The proposed uses are all permitted within HI-O zoning and fit within the existing land use in the area. In compliance with COF code table 10-40.30.050.B Note 3, no existing residential use is present within a quarter mile of the proposed compost facility use. Currently, approximately 7.29 acres of HI-O zoned land is being utilized by Restoration Soils, an industrial composting and soil amendment business on and RTR, an asphalt and concrete recycling business on the project site. This is currently located on future Parcels B and C according to the Preliminary Plat.

The detailed breakdown of the proposed parcel sizes and uses are as follows:

Parcel A: Manufacturing/Processing Heavy - 7.77 acres

Parcel B: Composting and Material Supply – 4.88 acres (existing site zoned HI-O)

Parcels C, D, E, and F: Construction Storage and Supply Yard – 5.19, 3.84, 2.68, and 2.88 acres, respectively

Parcel G: Supply Yard/Potentially sold to City of Flagstaff as trailhead – 3.06 acres

Parcel H: Remaining parcel to be sold to the City of Flagstaff and not rezoned - 22.90 acres

El Paso Rd Land LLC believes that healthy economies are diverse economies, and 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, we can support a diverse and strong economic base.

Parcel H consists of the FEMA rural floodplain area along the Rio de Flag and this land is anticipated to be sold to the City of Flagstaff. In 2004, City of Flagstaff voters approved Proposition 302 to acquire Open Space and FUTS corridors. Coming out of that voter approved bond, the Flagstaff City Council passed Ordinance 2022-26 which authorized acquisition of specific parcels, including #331 and #336, representing approximately 23 acres of the recently acquired State Trust Land parcel by El Paso Rd Land LLC. This area is identified as Parcel “H” on the Concept Rezone Map.

In addition to the area identified for Open Space and FUTS acquisition (Parcel “H”), El Paso Rd Land LLC is also in preliminary discussions with the City about selling Parcel “G” as a trailhead and parking area for non-motorized access to the Rio de Flag and Picture Canyon area.

LEGAL DESCRIPTION

A parcel of land located in the northeast quarter of Section 8, Township 21 North, Range 8 East, Gila and Salt River Base and Meridian, Coconino County, Arizona. The parcel is that a portion of land owned by the state of Arizona in the northeast quarter of section 8 which lies north of the Burlington Northern and Santa Fe Railroad right of way. The full legal description of the subject parcel is provided in the Alta Survey included with the Preliminary Plat submittal.

PROPOSED ACCESS

Five of the new parcels (A,B,C,D, E and F) 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. Parcels B through G will have cross access agreements in place to allow access through the parcels from driveways on N. El Paso Flagstaff Road located on Parcels B, C, and D. If Parcel G is sold to the City for use as a trailhead, this parcel will not be included in the future cross access agreement.

TRAFFIC

As part of the City of Flagstaff development process, a Traffic Study has been completed that analyzes the traffic impacts of the development of the new HI-O parcels. The main access road, El Paso Flagstaff Road, will provide access to the proposed parcels, and the existing CEMEX, Wildcat Sewer Treatment Plant, El Paso Natural Gas, and secondary access to the Coconino County Facility. The proposed rezone 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 statements have evaluated the existing roadways in the vicinity for turn lane warrants based on sight distance requirements and crash analysis data.

NATURAL RESOURCES

The project is located within the City of Flagstaff Resource Protection Overlay Zone (RPOZ). Zoning Code requires industrial zoned developments to save 20% of the existing trees within the subject parcel. The proposed development saves several existing trees. The design preservation rate of trees outside of the slope resources will maintain the required 20% preservation rate.

Flagstaff zoning code also requires that industrial zones preserve 60% of slope resource areas in the 17-24.99% category, and 80% of slope resource areas in the 25-34.99% category. Slope resources in excess of 35% shall not be disturbed. The proposed preservation rate for these categories will meet the requirements. A majority of the steep slope resources fall within Parcel H, which is designated to be sold to the City of Flagstaff as it contains the Rio de Flag. There is a small portion of the FEMA rural floodplain that extends into Parcels F and G which will remain untouched. The remainder of this floodplain lies within the future City Parcel H.

Steep slopes preserved in excess of the requirements may be counted towards the tree resource preservation rate. After considering slope conversion to tree points and preserved tree points within slope resources, the total preservation rate is 125.6% (using the total tree points outside of slope resources as the 100% tree points). Refer to the Preliminary Plat NRPP for additional details.

CULTURAL RESOURCES

The City of Flagstaff zoning code requires Heritage Preservation as part of the development process in order to protect and enhance the City's cultural, historical, and archaeological heritage. A cultural resource study was conducted in compliance with City of Flagstaff requirements. The proposed Lot A contains an eligible cultural resource site as identified by the HPTP dated December 8, 2024, and Revised June 6, 2025. As part of the mitigation strategy laid out in the HPTP, no construction activities can occur within the site boundaries until all fieldwork has been completed. The primary artifact concentration area is located within the proposed improvements for Lot A. The overall study boundary and mechanical trenching plan encroaches into the proposed development of Lot A. Data recovery and associated reporting must be completed per the HPTP (Phase I and II as required) before any construction activities can commence within the identified study area. If any cultural materials or features are identified during construction, they must be documented per the requirements of the HPTP. Once mitigation is complete, any discovery of cultural materials during construction will be treated as an inadvertent discovery. Inadvertent discoveries of cultural resources are covered under City of Flagstaff Division 10-30.30 Section F, which states that all work should be halted if the work impacts previously unknown resources.

SCENIC VIEW CORRIDORS

View corridors from the site include the San Francisco Peaks to the northwest, Cinder Hill and Picture Canyon to the north, Wildcat Sewer Treatment Plant to the east, and BSNF Railroad and I-40 to the south. Development will generally consist of smaller single-story buildings that will not impact existing view corridors.

INFRASTRUCTURE

WATER/SEWER

In compliance with City of Flagstaff Engineering Code requirements, water will be provided to the parcels from the existing 12" water main in Route 66 and the existing 8" water main in N. El Paso Flagstaff Road. Sewer will be provided to the lots from the sewer main that is located within the Rio de Flag to the southwest and northeast of the rezoned lots. There is an existing 33" sewer main and a new sewer trunk line that is currently in design for Wildcat Sewer. With the timing of this project, a sewer main extension will likely connect to the new sewer trunk line in Route 66 to provide sewer service to Parcel G and another sewer main extension will connect northeast of the project area to provide service to the remaining parcels. A Water and Sewer Impact Analysis has been completed by the City of Flagstaff.

DRAINAGE/STORMWATER

Most of the subject property currently drains to the west and north into the Rio de Flag. 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. Refer to the Preliminary Drainage Report for more information.

MATERIAL MANAGEMENT STRATEGIES

Trash and recycling services will be provided throughout the parcels at refuse enclosures for pick-up by the City as required for each parcel. Trash enclosures will be designed to accommodate for City trash truck turning movements and clearance and slope requirements.

PUBLIC SERVICES

FIRE

The City Fire Department provides fire coverage for the El Paso Industrial Park area. The closest fire station is Station #3 located at 4500 E Nestle Purina Avenue, approximately 2 miles (travel distance) from the project site. The El Paso Industrial Park provides suitable fire access in its existing conditions. Additional fire protection will be provided for the new parcels as required by City of Flagstaff Fire Code, Engineering requirements for fire safety, and adopted national fire codes. New fire hydrants are proposed along Route 66 and N El Paso Road to serve the new development.

POLICE

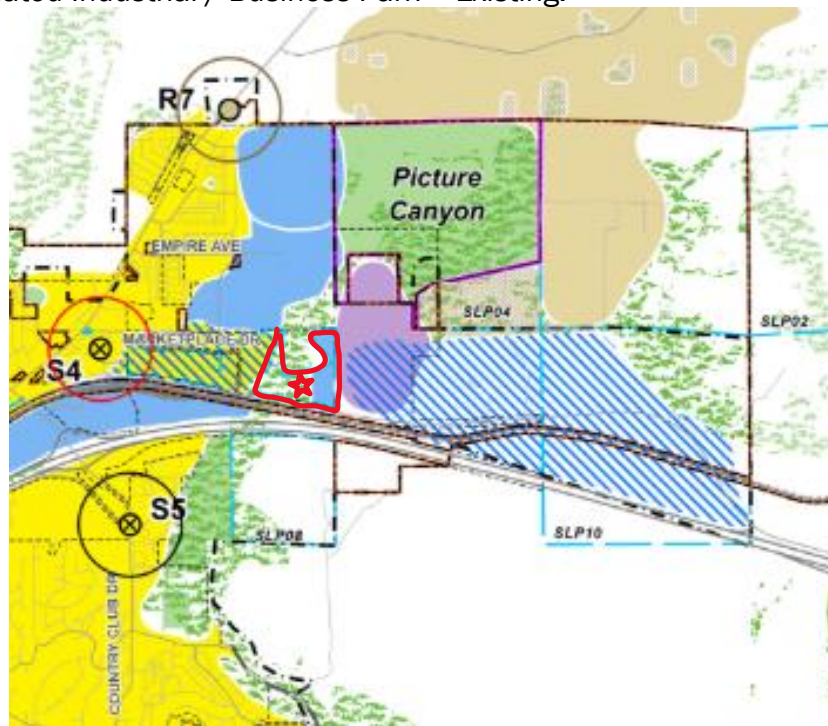
The City Police Department will be the police protection agency for the El Paso Industrial Park.

GENERAL PLAN CONFORMANCE

The Flagstaff Regional Plan 2030 establishes the community's intention for what the region could and should be for future generations and presents a regional context for the preservation and enhancement of the community's character and natural environment, while providing for appropriate growth and development. El Paso Industrial Park has been designed in cooperation with the vision and goals set forth within the Flagstaff Regional Plan 2030 related to new commercial and industrial developments within the City's planning boundaries.

The 54.08-acre parcel was formerly State Trust Land brought to auction by the Arizona State Land Department in 2024 and acquired by El Paso Rd Land LLC. The existing Property is primarily zoned Highway Commercial (HC) with 7.29 acres zoned Heavy Industrial Open (HI-O). El Paso Industrial Park involves the rezoning of approximately 23.89 acres of the Property from HC to HI-O. The remaining 22.9 acres (for Parcel "H") will be sold to the City of Flagstaff for the preservation of the floodplain and the adjacent natural resources.

The east +/- 28 acres of the subject property are designated as "Existing Employment/Industrial" by Map 22: Future Growth Illustration and "Industrial / Business Park - Existing" by Map 24: Activity Centers. The west +/- 26 acres of the subject property are designated as "Concentration of Natural Resources" by Map 22: Future Growth Illustration. The proposed development is guided by these land uses. The proposed zoning reflects the intended development in the Flagstaff Regional Plan 2030. A chapter-by-chapter analysis of the Flagstaff Regional Plan 2030 against this application has been prepared, and the following analysis demonstrates that approval of El Paso Industrial Park is consistent with and furthers the goals and policies of the Regional Plan that are intended to apply to development of new development primarily designated Industrial / Business Park - Existing.



REGIONAL PLAN ANALYSIS

NATURAL ENVIRONMENT

CHAPTER IV – ENVIRONMENTAL PLANNING & CONSERVATION

Air Quality

Goal E&C.1. Proactively improve and maintain the region's air quality.

Policy E&C.1.2. Pursue reduction of total emissions of high-priority pollutants from commercial and industrial sources and area-wide smoke emissions.

Policy E&C.1.3. Encourage strategies and partnerships to mitigate dust.

Policy E&C.1.4. Maintain air quality through pursuit of non-polluting industry and commercial enterprises.

Response: El Paso Industrial Park includes four parcels of land that are proposed to be used as a construction storage and supply yard along with one other parcel currently used for composting and material supply. One other parcel is proposed to be sold to the City of Flagstaff for the preservation of the FEMA floodplain and the adjacent natural environment. The remaining parcel (Parcel "A") is proposed to be used for manufacturing and heavy processing. The user of Parcel "A" has, and will continue to have, an Arizona Department of Environmental Quality (ADEQ) permit for air quality and the operator will continue to adhere to Method 9 compliance from ADEQ. Smoke pollution will be little to none for the Project. Best management practices will be used to monitor and mitigate dust. Overall, for air quality, the traffic generated emissions will be lower than a Highway Commercial development under the current zoning.

Climate Change & Adaptation

Goal E&C.2. Achieve carbon neutrality for the Flagstaff community by 2030.

Policy E&C.2.1. Encourage the reduction of energy and material consumption.

Policy E&C.2.2. Promote investments that create a connected and efficient community, decrease emissions from transportation and building energy, and strengthen climate resiliency.

Policy E&C.2.3. Review and revise existing regulations, standards, and plans (codes, ordinances, etc.) to reduce community greenhouse gas emissions.

Policy E&C 2.4. Promote developments that help the community achieve carbon neutrality through strategies that reduce the project's emissions from transportation, energy, and consumption.

Goal E&C.3. 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.

Policy E&C.3.1. Develop and implement a comprehensive and proactive approach to prepare the community for and to minimize the impacts of climate change induced hazards.

Policy E&C.3.2. Review and revise existing regulations, standards, and plans (codes, ordinances, etc.) to reduce the community's vulnerability to climate change impacts and reduce the disproportionate impacts on vulnerable communities.

Policy E&C.3.3. Invest in forest health and watershed protection measures.

Policy E&C.3.6. Commit to equitably distribute the burdens and benefits of climate action policies and investments to all segments of the community.

Goal E&C.4. Integrate available science into policies governing the use and conservation of Flagstaff's natural resources.

Policy E&C.4.1. Assess vulnerabilities and risks of Flagstaff's natural resources in the context of anticipated climate changes and resulting changes to Flagstaff's systems.

Policy E&C.4.2. Develop water use policies that attempt to integrate current best projections of climate change effects on the Colorado Plateau's water resources and emphasize conservation.

Response: The Property is located in a rural area within the boundary of the City of Flagstaff which is suitable for industrial uses. There will not be any disproportionate impacts on vulnerable communities as a result of this Project.

Restoration Soils, the compost facility which currently operates on the site , plays an important role in the City of Flagstaff's Carbon Neutrality plan. Composting of organic wastes eliminates the production of methane gas which is a greenhouse gas that is some 30 times more potent than carbon dioxide. The finished compost and soil amendments are utilized as a regenerative soil product which greatly improves soil porosity, water conservation and healthy soil microbiology.

Additionally, the parcel slated for Manufacturing Heavy is a recycling facility where concrete and asphalt products are recycled and turned into products that otherwise would have to be made from virgin materials and imported from outside of Flagstaff.

These heavy industrial operations are local businesses engaging in local climate solutions. Likewise, another portion of the Property will be sold to the City of Flagstaff for its ultimate protection. Furthermore, a large portion of the Property is proposed to serve as construction storage and supply yards. The addition of these land uses under new zoning will allow for the reduction of energy and materials by providing a space for construction companies to store their equipment and materials within City limits but within an appropriate rural space instead of traveling from adjacent communities.

El Paso Rd Land LLC believes that healthy economies are diverse economies, and 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, the Project can support a diverse and strong economic base while being conscious of the impacts on climate change.

Dark Skies

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.5.1. Evaluate the impacts of the retention of dark skies regarding lighting infrastructure and regulatory changes, land use decisions or changes, and proposed transportation developments within the region.

Policy E&C.5.4. Encourage uses within Lighting Zone 1 of the lighting codes of the City and County that do not require outdoor lighting, and discourage those which require all-night lighting.

Response: El Paso Industrial Park's proposed land uses align with the community's desire to maintain dark skies. The lighting required and proposed with the Project will meet all City Dark Sky requirements and will be much reduced when compared to a standard commercial development under the current zoning.

Ecosystem Health

Goal E&C.6. Protect, restore and improve ecosystem health and maintain native plant and animal community diversity across all land ownerships in the Flagstaff region.

Policy E&C.6.3. Promote protection, conservation, and ecological restoration of the region's diverse ecosystem types and associated animals.

Policy E&C.6.4. Support collaborative efforts to return local native vegetation, channel structure and, where possible and applicable, preservation and restoration of in-stream flows to the region's riparian ecosystem.

Policy E&C.6.5. Preserve Flagstaff's wetland areas and discourage inappropriate development that may adversely affect them and the ecosystem services they provide.

Policy E&C.6.6. Support cooperative efforts for forest health initiatives or practices, such as the Four Forest Restoration Initiative (4FRI), to support healthy forests and protect our water system.

Policy E&C.6.7. Use best practices to control the spread of exotic and invasive plants, weeds, and animals, and eradicate where possible.

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.

Response: As mentioned above, Parcel H consists of the FEMA rural floodplain area along the Rio de Flag and this land is anticipated to be sold to the City of Flagstaff. In 2004, City of Flagstaff voters approved Proposition 302 to acquire Open Space and FUTS corridors. Coming out of that voter approved bond, the Flagstaff City Council passed Ordinance 2022-26 which authorized acquisition of specific parcels, including #331 and #336, representing approximately 23 acres of the recently acquired State Trust Land parcel by El Paso Rd Land, LLC. This area is identified as Parcel "H" on the Concept Rezone Map.

In addition to the area identified for Open Space and FUTS acquisition (Parcel "H"), El Paso Rd Land, LLC. is also in preliminary discussions with the City about selling Parcel "G" as a trailhead and parking area for non-motorized access to the Rio de Flag and Picture Canyon area.

The existing parcel had no invasive weed management performed on it for many decades. The proposed project will provide for better management of invasive weeds. The Project intends to work alongside the land it will serve. For storage and supply areas, best management practices will be implemented and followed to reduce the transportation and/or onsite spread of exotic and invasive plants, weeds, and animals. For areas where new landscaping is required, native, drought-tolerant or edible species appropriate to the area will be planted.

Environmentally Sensitive Lands

Goal E&C.7. Give special consideration to environmentally sensitive lands in the development design and review process.

Policy &C.7.1. Design development proposals and other land management activities to minimize the alteration of natural landforms and maximize conservation of distinctive natural features.

Policy E&C.7.2. Favor the use of available mechanisms at the City and County level for the preservation of environmentally sensitive lands, including but not limited to public acquisition, conservation easements, transfer of development rights, or clustered development with open space designations.

Response: As mentioned above, the Project intends to give special consideration to environmentally sensitive lands as this goal describes by selling a portion of the Subject Property to the City of Flagstaff for its ultimate conservation.

Natural Quiet

Goal E&C.8. Maintain areas of natural quiet and reduce noise pollution.

Policy &C.8.1. Establish location-appropriate sound management tools with measurable criteria.

Policy E&C.8.2. Evaluate land uses and transportation proposals for their potential noise impacts.

Response: Considering the land uses offered within the El Paso Industrial Park, noise impacts will be limited and monitored as to not disturb the natural quiet of the area.

Soils

Goal E&C.9. Protect soils through conservation practices.

Policy E&C.9.2. Construction projects employ strategies to minimize disturbed area, soil compaction, soil erosion, and destruction of vegetation.

Response: El Paso Rd Land, LLC. intends to sell approximately 22.9 acres to the City of Flagstaff for the preservation of the floodplain, wildlife habitat, and the adjacent natural resources including existing soils.

Wildlife

Goal E&C.10. Protect indigenous wildlife populations, localized and larger-scale wildlife habitats, ecosystem processes, and wildlife movement areas throughout the planning area.

Policy E&C.10.1. Encourage local development to protect, conserve, and when possible enhance and restore wildlife habitat.

Policy E&C.10.6. Conserve and restore important wildlife corridors throughout the planning area to allow wildlife to find suitable habitat in the face of climate change by moving along vegetational and elevational gradients.

Response: El Paso Rd Land, LLC. intends to sell approximately 22.9 acres to the City of Flagstaff for the preservation of the floodplain, wildlife habitat, and the adjacent natural resources.

CHAPTER V – OPEN SPACE

Open Space

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.

Policy OS.1.1. Establish a Conservation Land System supported by stakeholders (federal, state, city, county, non-profit, and interested citizens) to inventory, map, update, and manage the region's green infrastructure including open space planning, acquisition, conservation, protection, and long-term management and maintenance.

Policy OS.1.2. While observing private property rights, preserve natural resources and priority open lands, under the general guidance of the Flagstaff Area Open Space and Greenways Plan and the Natural Environment maps.

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.

Response: As mentioned, the Property Owner intends to sell a large portion of the Property to the City of Flagstaff for its ultimate conservation to protect the natural resources and wildlife habitats. The Project offers approximately 3,700 linear feet of new FUTS trail along the east and west banks of the Rio de Flag to fill the gap in the pedestrian connectivity to this natural environment. Parcel G is intended to be a trailhead and parking area for non-motorized access to the Rio de Flag and Picture Canyon area for the community to enjoy the views and the quiet that this area offers.

CHAPTER VI – WATER RESOURCES

Planning to Meet Future Demands

Goal WR.4. Logically enhance and extend the City's public water, wastewater, and reclaimed water 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.4.1. Use the *Regional Plan* as a guide for the *Utilities Integrated Master Plan* to better plan for the necessary infrastructure sizing and location to accommodate planned growth and resource management.

Policy WR.4.3. Development requiring public utility services will be located within the Urban Growth Boundary.

Response: The proposed land uses are low-water use and reclaimed water use industries which suits the region over more water-intensive uses under the current zoning. In compliance with City of Flagstaff Engineering Code requirements, water will be provided to the parcels from the existing 12" water main in Route 66 and the existing 8" water main in N. El Paso Flagstaff Road. A Water and Sewer Impact Analysis has been completed by the City of Flagstaff. Additionally, the Project has submitted a Reclaimed Water Impact Analysis request.

Stormwater and Watershed Management

Goal WR.5. Manage watersheds and stormwater to address flooding concerns, water quality, environmental protections, and rainwater harvesting.

Policy WR.5.1. Preserve and restore existing natural watercourse corridors, including the 100-year floodplain, escarpments, wildlife corridors, natural vegetation, and other natural features using methods that result in a clear legal obligation to preserve corridors in perpetuity, where feasible.

Policy WR.5.2. Incorporate pedestrian access, trails, and watchable wildlife opportunities into natural watercourses when practical.

Policy WR.5.3. Identify downstream impacts as the result of development and provide for mitigation measures to address impacts. When possible, mitigations should be non-structural in nature.

Policy WR.5.4. Develop any necessary stormwater infrastructure improvements consistent with City of Flagstaff stormwater master plans or studies as adopted by the City.

Policy WR.5.5. Give preference to regional detention facilities that are designed in conjunction with smaller low-impact development features, rather than numerous smaller dispersed basins. Encourage regional detention basins to incorporate.

Policy WR.5.6. Implement stormwater harvesting techniques to support water conservation strategies by collecting and using local precipitation in the vicinity where it falls to support both human and overall watershed health needs.

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

Response: As previously mentioned, a significant portion of the Property will be sold to the City for the preservation of the floodplain and the adjacent natural resources; and, the Project offers approximately 3,700 linear feet of new FUTS trail along the east and west banks of the Rio de Flag to fill the gap in the pedestrian connectivity to this natural environment. Most of the subject property currently drains to the west and north into the Rio de Flag. 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.

Water Quality

Goal WR.6. Protect, preserve, and improve the quality of surface water, groundwater, and reclaimed water in the region.

Policy WR.6.3. Implement 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>.

Policy WR.6.4. Encourage low-impact development strategies.

Response: 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.

CHAPTER VII – ENERGY

Efficient Use of Energy

Goal E.1. Increase energy efficiency.

Policy E.1.1. Promote and encourage innovative building practices through instruction on efficient building materials and methodology.

Policy E.1.4. Promote cost-effective, energy-efficient technologies and design in all new and retrofit buildings for residential, commercial, and industrial projects.

Policy E.1.5. Promote and encourage the expansion and use of energy-efficient modes of transportation: a. Public transportation b. Bicycles c. Pedestrians.

Policy E.1.6. Develop land use regulations promoting land use patterns that increase energy efficiency.

Policy E.1.10. Incentivize energy efficiency and renewable energy technologies in construction projects.

Response: El Paso Industrial Park will meet all energy efficiency standards per the City of Flagstaff Building Code. El Paso Industrial Park promotes energy-efficient alternatives to motorized forms of transportation by including approximately 3,700 linear feet of new FUTS trail along the banks of the Rio de Flag that favors pedestrian and bike access to the natural environment. The known users are engaged in developing and manufacturing materials and soil amendments which were previously imported into Flagstaff, so there will be reduced transportation associated with producing a product locally.

BUILT ENVIRONMENT

CHAPTER VIII – COMMUNITY CHARACTER

Scenic Resources and Natural Setting

Goal CC.1. Reflect and respect the region's natural setting and dramatic views in the built environment.

Policy CC.1.1. Preserve the natural character of the region through planning and design to maintain views of significant landmarks, sloping landforms, rock outcroppings, water courses, floodplains, and meadows, and conserve stands of ponderosa pine.

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.1.3. Design development patterns to maintain the open character of rural areas, protect open lands, and protect and maintain sensitive environmental areas like mountains, canyons, and forested settings.

Policy CC.1.6. Encourage cluster development to preserve open space, viewsheds, and scenic vistas.

Response: El Paso Industrial Park has been planned around the preservation of the Rio de Flag, steep slope resources, tree resources, and associated wildlife habitat. Development has been clustered along the east side of the Property in order to preserve the west side.

Heritage Preservation

Goal CC.2. Preserve, restore, and rehabilitate heritage resources to better appreciate our culture.

Policy CC.2.1. Actively locate, identify, interpret, and preserve historical, archaeological, and cultural resources, in cooperation with other agencies and non-governmental organizations, as aspects of our society for future generations to retain, understand, and enjoy their cultural identity.

Response: The City of Flagstaff zoning code requires Heritage Preservation as part of the development process in order to protect and enhance the City's cultural, historical, and archaeological heritage. A cultural resource study was conducted in compliance with City of Flagstaff requirements. The proposed Lot A contains an eligible cultural resource site as identified by the HPTP dated December 8, 2024, and Revised June 6, 2025. As part of the mitigation strategy laid out in the HPTP, no construction activities can occur within the site boundaries until all fieldwork has been completed. The primary artifact concentration area is located within the proposed improvements for Lot A. The overall study boundary and mechanical trenching plan encroaches into the proposed development of Lot A. Data recovery and associated reporting must be completed per the HPTP (Phase I and II as required) before any construction activities can commence within the identified study area. If any cultural materials or features are identified during construction, they must be documented per the requirements of the HPTP. Once mitigation is complete, any discovery of cultural materials during construction will be treated as an inadvertent discovery. Inadvertent discoveries of cultural resources are covered under City of Flagstaff Division 10-30.30 Section F, which states that all work should be halted if the work impacts previously unknown resources.

CHAPTER IX – GROWTH AREAS & LAND USE

Greenfield Development

Goal LU.2. Develop Flagstaff 's Greenfields in accordance with the Regional Plan and within the growth boundary.

Policy LU.2.2. Design new development to coordinate with existing and future development, in an effort to preserve viewsheds, strengthen connectivity, and establish compatible and mutually supportive land uses.

Policy LU.2.3. New development should protect cultural and natural resources and established wildlife corridors, where appropriate.

Policy LU.2.4. Utilize Low Impact Development (LID) strategies and stormwater best practices as part of the overall design for new development.

Policy LU.2.5. Plan Greenfield development within the rural context to encourage formal subdivisions with shared infrastructure instead of wildcat development, and to protect open spaces, and access to public lands.

Response: El Paso Industrial Park is in the perfect rural setting and preserves the special and scenic view corridors of the area, strengthens connectivity with the new FUTS trails, and preserves the floodplain while establishing compatible and mutually supportive land uses under the proposed zoning of HI-O. The Property Owner has completed its due diligence on existing cultural resources in the project area and intends to meet all appropriate regulations. The Project is committed to managing its stormwater efficiently and prudently, including utilizing Low Impact Development strategies.

Applicable to All Land Uses

Goal LU.3. Continue to enhance the region's unique sense of place within the urban, suburban, and rural context.

Policy LU.3.1. Within the urban, suburban, and rural context, use neighborhoods, activity centers, corridors, public spaces, and connectivity as the structural framework for development.

Policy LU.3.2. Coordinate land use, master planning, and recreational uses, when feasible, with local, state, and federal land management agencies and tribal land owners.

Goal LU.5. Encourage compact development principles to achieve efficiencies and open space preservation.

Policy LU.5.1. Encourage development patterns within the designated growth boundaries to sustain efficient infrastructure projects and maintenance.

Policy LU.5.3. Promote compact development appropriate to and within the context of each area type: urban, suburban, and rural.

Goal LU.6. Provide for a mix of land uses.

Policy LU.6.2. Consider 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.

Goal LU.7. Provide for public services and infrastructure.

Policy LU.7.1. Concentrate 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.

Policy LU.7.3. Require development proposals to address availability of adequate public services.

Goal LU.8. Balance future growth with available water resources.

Policy LU.8.1. Available water resources should be a consideration for all major development and subdivision applications.

Policy LU.8.2. Impacts on the City's water delivery infrastructure should be a consideration for all residential and nonresidential development proposals.

Response: El Paso Industrial Park is situated in a perfect rural pocket suited for industrial uses, similar to the adjacent uses, with 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.

Rural Area

Goal LU.14. Maintain the character of existing rural communities.

Policy LU.14.1. Maintain rural growth boundaries to preserve the integrity of open spaces identified in the Greater Flagstaff Open Spaces and Greenways Plan and updates.

Policy LU.14.2. Promote the coordination of the Flagstaff Regional Plan, Coconino County Comprehensive Plan, and area plans that takes into account local conditions and preferences of area residents.

Policy LU.14.4. Connect rural neighborhoods using roads, trails (equestrian, foot, and bicycle), and public access to the National Forest.

Policy LU.14.5. Promote cluster development as an alternative development pattern in appropriate locations as a means of preserving rural resources and to minimize service and utility costs.

Response: El Paso Industrial Park has been designed in order to preserve the adjacent land for its ultimate protection while clustering the industrial development to the east adjacent to existing roadways and utilities. The Project will also provide additional FUTS trails that close a gap from Route 66 along the Rio de Flag to Picture Canyon.

Employment Area

Goal LU.16. Establish heavy industrial areas that provide for the manufacturing of goods, flexible space, and intermodal facilities that are well maintained, attractive and compatible with adjoining nonindustrial uses.

Policy LU.16.2. Ensure new industrial areas are compatible with surrounding areas.

Policy LU.16.3. Locate new industrial areas near the rail line, major highways or the interstate, and ensure they are designed to be compatible with surrounding uses and gateway features.

Policy LU.16.4. Limit the impacts of truck traffic on residential areas.

Policy LU.16.5. Consider all health impacts on the community in the design of new industrial uses, such as wastewater treatment, traffic safety, noise, and other impacts.

Response: El Paso Industrial Park is surrounded by other parcels zoned HC and HI-O. The Property borders the City of Flagstaff Wildcat Wastewater Treatment Facility on the east, the Cemex Cement Plant and Coconino County 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). There are no residential uses within a half mile of the proposed development.

CHAPTER X – TRANSPORTATION

Mobility and Access

Goal T.1. Improve mobility and access throughout the region.

Policy T.1.1. Integrate a balanced, multimodal, regional transportation system.

Policy T.1.2. Apply Complete Street Guidelines to accommodate all appropriate modes of travel in transportation improvement projects.

Policy T.1.3. Transportation systems are consistent with the place type and needs of people.

Policy T.1.6. Provide and promote strategies that increase alternate modes of travel and demand for vehicular travel to reduce peak period traffic.

Response: Five of the new parcels (A,B,C,D, E and F) 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. Parcels G and H will have direct access off Route 66. Parcels B through G will have cross access agreements in place to allow access through the parcels from driveways on N. El Paso Flagstaff Road located on Parcels B, C, and D. If Parcel G is sold to the City for use as a trailhead, this parcel will not be included in the future cross access agreement.

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 new HI-O parcels. The main access road, El Paso Flagstaff Road, will provide access to the proposed parcels, and the existing CEMEX, Wildcat Sewer Treatment Plant, El Paso Natural Gas, and secondary access to the Coconino County Facility. The proposed rezone 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.

Safe and Efficient Multimodal Transportation

Goal T.2. Improve transportation safety and efficiency for all modes.

Policy T.2.1. Design infrastructure to provide safe and efficient movement of vehicles, bicycles, and pedestrians.

Response: 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.

Environmental Considerations

Goal T.3. Provide transportation infrastructure that is conducive to conservation, preservation, and development goals to avoid, minimize, or mitigate impacts on the natural and built environment.

Response: In this rural setting, the development has been planned such that it is adjacent to existing roadway infrastructure and where necessary improvements to the existing roadways will be completed.

Quality Design

Goal T.4. Promote transportation infrastructure and services that enhance the quality of life of the communities within the region.

Policy T.4.1. Promote context sensitive solutions (CSS) supportive of planned land uses, integration of related infrastructure needs, and desired community character elements in all transportation investments.

Response: The addition of pedestrian and bike facilities promotes the enhancement of the quality of life of the Flagstaff community.

Pedestrian Infrastructure

Goal T.5. Increase the availability and use of pedestrian infrastructure, including FUTS, as a critical element of a safe and livable community.

Policy T.5.1. Provide accessible pedestrian infrastructure with all public and private street construction and reconstruction projects.

Response: As previously mentioned, 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.

Bicycle Infrastructure

Goal T.6. Provide for bicycling as a safe and efficient means of transportation and recreation.

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.

Response: As previously mentioned, the Project will provide approximately 3,700 linear feet of new FUTS trails along the banks of the Rio de Flag for bicycle access to Picture Canyon.

HUMAN ENVIRONMENT

CHAPTER XIV – ECONOMIC DEVELOPMENT

Community Character

Goal ED.7. Continue to promote and enhance Flagstaff’s unique sense of place as an economic development driver.

Policy ED.7.1. Support planning, design, and development that positively, creatively, and flexibly contribute to the community image

Response: El Paso Rd Land LLC believes that healthy economies are diverse economies, and 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, we can support a diverse and strong economic base.

Findings for Zoning Map Amendment

Pursuant to Section 10-20.50.040 of the Zoning Code, an amendment to the Zoning Map may be approved if all of the following findings are made, as applicable to the type of amendment:

1. The proposed amendment is consistent with and conforms to the goals and policies of the Regional Plan.

Response: The proposed rezone is consistent with and conforms to the goals and policies of the Regional Plan. As shown on the Future Growth Illustration Map of the Regional Plan, the Property has two types of land use designations: “Area Types” describe the placemaking context of Urban, Suburban, Rural, or Employment; and “Place Types” such as activity centers, corridors, and neighborhoods which provide the framework for density, intensity, and uses within the Area Types. A majority of the portion of the Property that will be developed falls within the Industrial / Business Park - Existing Area Type, with a smaller portion intended to be sold to the City falling within Concentration of Natural Resources Area Type. The proposed HI-O zoning district and site plan conform to the Area and Place Type designations on the Property.

El Paso Industrial Park promotes and furthers the following Regional Plan key points and community benefits. A detailed analysis of the Regional Plan is provided above.

- a. Growth areas – Employment
- b. Economic Development
- c. Environmental Conservation

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.]

Response: 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 provides employment opportunities and conserves the natural environment and resources—all in keeping with the designated Area and Place Types on the Property. El Paso Industrial Park promotes the clustering of heavy industrial uses in space that is appropriate in this rural pocket adjacent to similar uses and preserves the natural floodplain by selling a portion of the Property to the City for its preservation.

3. The affected site is physically suitable in terms of design, location, shape, size, operating characteristics and the provision of public and emergency vehicle access and public services and utilities 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.

Response: The requested rezone and proposed use will not endanger, jeopardize or constitute a hazard to the property or improvements in the vicinity. The proposed zone change conforms to the Regional Plan and will meet all applicable development standards, engineering requirements, and building codes. 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. Development plans and construction documents will be submitted to the City for review to ensure proper and orderly development.