



# PINE CANYON TRACT 25 APPLICATION FOR MINOR REGIONAL PLAN AMENDMENT AND REZONE

SYMMETRY COMPANIES, LLC

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CASE NUMBERS: PZ-24-00236-01 & PZ-24-00236-02

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MAY 13TH 2025 - UPDATED DECEMBER 3RD 2025



# DEVELOPMENT TEAM

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# PROJECT DATA

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**PROJECT NAME:** Pine Canyon Tract 25

**CASE NUMBERS:** PZ-24-00236-01 & PZ-24-00236-02

**SITE ADDRESS:** SE Corner of JWP and Links Road

**ASSESSOR'S PARCEL NUMBER:** 10510208A

**SITE AREA (ACRES):** 4.3 Acres

**PROPOSED LOTS:** 1-4 (3 Proposed)

**EXISTING ZONING CLASSIFICATION:** Single Family Residential – Resource Protection Overlay (RI-RPO)

**PROPOSED ZONING CLASSIFICATION:** Estate Residential – Resource Protection Overlay (ER-RPO)

**EXISTING REGIONAL PLAN CLASSIFICATION:** Suburban Neighborhood

**PROPOSED REGIONAL PLAN CLASSIFICATION:** Rural Neighborhood

**DATE OF PLAN PREPARATION:** May 13, 2025 - Updated December 3, 2025

# TABLE OF CONTENTS

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## I. INTRODUCTION

- A. LOCATION AND CONTEXT | 4
- B. PROPERTY HISTORY AND DEVELOPMENT ISSUES | 4
- C. RI DEVELOPMENT STANDARDS CANNOT BE ACHIEVED ON THIS SITE | 5
- D. FINANCIAL MODEL | 5
- E. REGIONAL PLAN OVERVIEW | 7

## II. DEVELOPMENT PROPOSAL

- A. ACCESS AND CIRCULATION | 9
- B. PEDESTRIAN CONNECTIVITY | 9
- C. RESOURCE PRESERVATION | 9
- D. INFRASTRUCTURE AND PUBLIC SERVICES | 9
- E. STORMWATER MANAGEMENT | II
- F. UTILITIES | II
- G. FIRE | II
- H. POLICE | II
- I. SCHOOLS | II
- J. CONSTRUCTIONS LOGISTICS | II
- K. PHASING | II
- L. PROJECT BENEFIT TO PUBLIC & COMMUNITY | II

## III. CONCLUSION | 13

## APPENDIX A - REGIONAL PLAN CONFORMANCE | 14

## I. Introduction

This Narrative is included with the Application for Minor Regional Plan Amendment and Rezone (the "Application") submitted by Symmetry Companies, LLC ("Symmetry"), an Arizona-based developer with ten years of experience creating welcoming communities that are both refined and comfortable. Symmetry proposes to amend the Regional Plan (minor) and rezone the approximate 4.3 acres located just outside of the main entry to Pine Canyon Estates, and east of the intersection of John Wesley Powell Boulevard and Links Road ("Property").

The Applicant is proposing a Minor Regional Plan Amendment from Suburban Neighborhood to Rural Neighborhood and a rezone from Single Family Residential—Resource Protection Overlay (R1-RPO) to Estate Residential—Resource Protection Overlay (ER-RPO) for Tract 25 ("Application"). See Legal Description. The Application proposes a 3-lot community that makes the most appropriate use of this uniquely shaped and currently underutilized out parcel. The project preserves significant open space and severe slopes while still providing much-needed housing at approximately 0.69 dwelling units per acre (du/ac).

## A. Location and Context

The property is comprised of approximately 4.3 acres of vacant, unimproved land located southeast of the Pine Canyon main entry, outside of the main gates, adjacent to John Wesley Powell Boulevard, as shown on the Aerial Map below. The property slopes Northwest to Southeast and contains dense canopy Ponderosa Pine trees as well as other resources shown on the Slope Analysis Plan. There are no known heritage resources on the Property.

The Overall Property is generally surrounded to the north by vacant, undeveloped property owned by Towns on Lone Tree Owner LLC and zoned High Density Residential - Resource Protection Overlay (HR-RPO), to the northeast by Coconino Community College zoned Public Facility, to the south by Pine Canyon Estates zoned Single Family Residential - Resource Protection Overlay (R1 -RPO), to the southwest by the US Forest Service zoned Rural Residential - Resource Protection Overlay (RR-RPO), and to the west by the Pinnacle Pines development zoned Medium Density Residential - Resource Protection Overlay (MR-RPO).

The 4.3 acres benefit from panoramic scenic view corridors to the San Francisco Peaks, Humphreys Peak, and Pine Canyon Golf Course, which will be preserved and celebrated as a unique community asset. The property is accessible and visible from John W. Powell Boulevard ("JWP") and Lone Tree Road.

## B. Property History and Development Issues

The history of Tract 25 demonstrates that the property has long been recognized as heavily constrained and unsuitable for conventional R1 development patterns. Under the original Pine Canyon Zoning and Development Agreement, the "Greater Parcel"—which included today's Tract 25, the land under Golf Hole 14 "Tract Q," and the area later platted as the Ghost Tree Subdivision (future Tract 23), was designated DC-2. In 2024, the legal boundary for Tract 25 was adjusted to accommodate a small portion of Tract Q (formerly golf course), after turf was removed from the Pine Canyon golf course. The DC-2 district, shown on the original Concept Plan, could theoretically accommodate up to 28 duplex units, with duplexes listed as an allowed use in the R1 zone. The Development Agreement, however, made clear that all development must respond to site constraints and stated that:

"Site design will be derived from an analysis of the existing resources and constraints on the site, including slopes and forested areas. Development of the site shall be designed to work with and minimize disruption to resources and be considerate of higher quality forest resources."

## AERIAL MAP



Tract 23 (Tract 25's neighbor to the south) was originally planned for duplexes under the Concept Plan, but even that site, significantly less constrained than Tract 25, was flagged by staff as having slope and resource protection issues, and was developed with single-family detached homes. As documented in the City's staff report for the Tract 23 Pre-Plat, the steep and forested conditions made development difficult within the R1-RPO standards. Tract 25 contains more extensive resource areas, steeper slopes, and narrower buildable areas than Tract 23, meaning the same challenges exist, but are intensified (33.75% of Tract 23 included slopes from 17-34.9% slopes - 26% of the site consists of 17-24.9% slopes, and 7.67% of the site consists of 25-34.9% slopes, and no 35+ slopes. Meanwhile, 45.16% of Tract 25 includes slopes from 17-over 35% slopes - 28.14% of the site consists of 17-24.9% slopes, 15.34% of the site consists of 25-34.9% slopes, and 1.6% of the site consists of slopes 35% and over).

In 2020, a preliminary-plat was submitted for The Estates at Pine Canyon Pine Bluff. Within that staff report, staff notes that, "The site has significant topography requiring the applicant to create larger lots to ensure that resource standards are met." Staff defends the lower density proposed by the project (1.48 units per acre - where 2.0 is required), by stating that, "The overall density of the Pine Canyon development meets the minimum density standards for the R1 zone." Because this parcel was one of the last to be developed within Pine Canyon, the lower density of this parcel was deemed acceptable - the same circumstances apply to Parcel 25.

In 2022, Symmetry submitted a proposal to develop a 39-unit, 3-story townhouse project on Tract 25. The accompanying materials (including necessary engineering justifications) documented the site's extreme topographic limitations, noting that the property's shape, narrowness, and 50-foot elevation change made horizontal development infeasible. That application further stated that the severe slopes and drainage easement forced vertical construction and height modifications, evidence that R1 standards could not reasonably be met even through a PRD or alternate product types. The townhome proposal for Tract 25 was abandoned upon further analysis due to excessive land development costs (wall terracing) required to construct the proposed product type and stay within the City's resource requirements.

Given this history, and under today's zoning and development standards, a 3-lot split represents the highest and best use of Tract 25. Without rezoning, the site cannot reasonably be developed because of overlapping and restrictive requirements, specifically:

- Urban cul-de-sac standards (13-23:10-04-010)
- R1 building form and property development standards (10-40.30.030)
- Resource Protection Standards (10-50.90.060)
- Subdivision Standards and Regulations (11-20.70 - Lot Design & Street Design)

If developed under R1, the property would require 9-10 lots arranged around a cul-de-sac. A standard cul-de-sac with a 63' radius consumes 12,661 square feet (0.29 acres)—a disproportionate impact on one of the few buildable portions of the property. Lot design standards within the zoning code dictate that, "Lots be designed appropriately for the location and character of the proposed development, street improvements, and underlying topography", "no subdivision shall create lots which are physically unsuitable for improvement due to size or shape, steepness of terrain, location of watercourses, problems of sewage or driveway grades, or other natural physical conditions", and "buildable area shall be determined by setback requirements and the location of natural topographic features." Further, street design standards mandate that, "street design is appropriate for underlying topography and in relation to existing streets." The smallest R1 lot, combined with steep slope protections renders conventional R1 development functionally impossible without variances, grading waivers, or substantial disturbance to resources the Development Agreement specifically intended to protect.

### C. R1 Development Standards Cannot be Achieved on the Site - Even with Minimum Lot Sizes

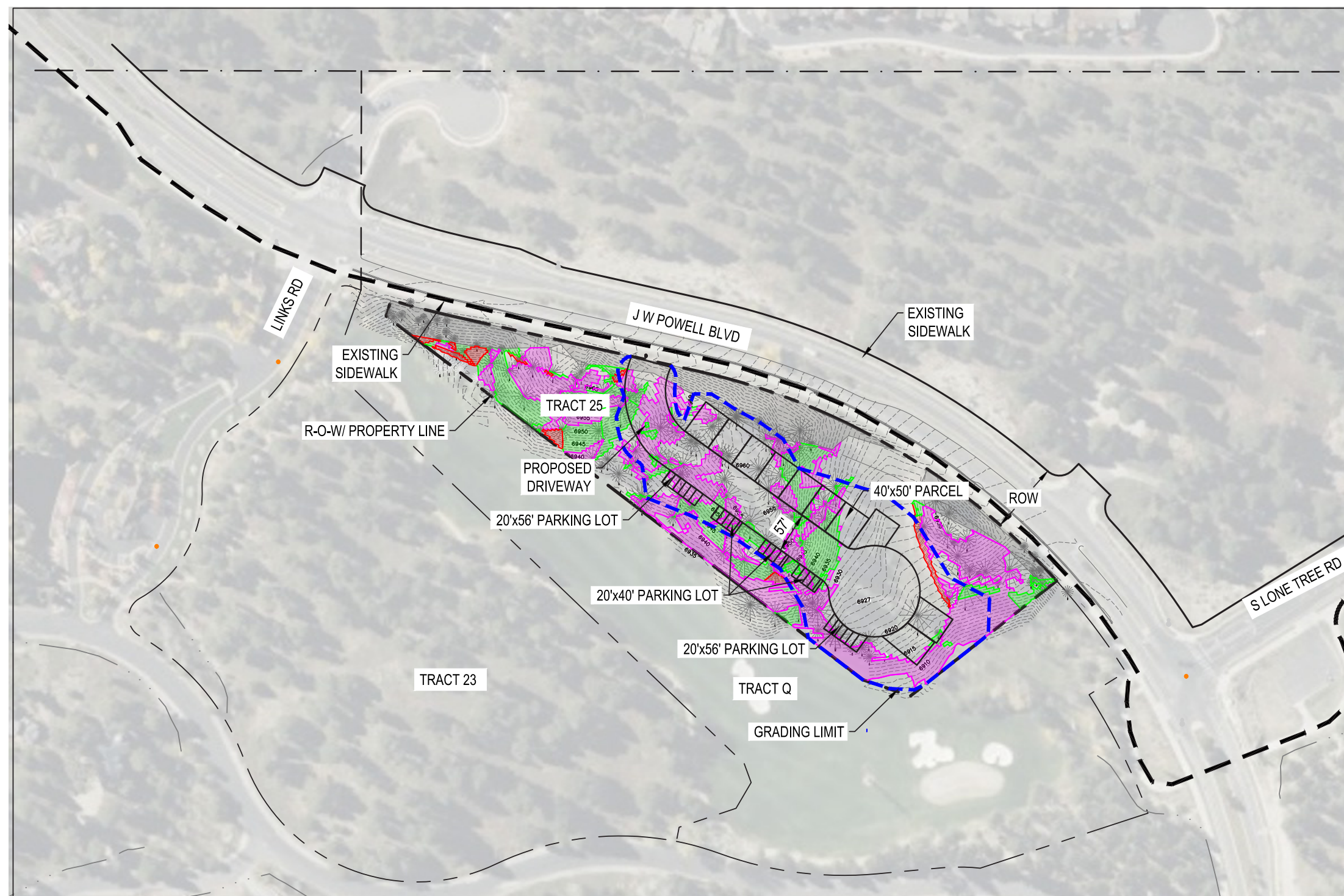
To further demonstrate in good faith that R1 development standards—PRD or otherwise—are not physically achievable on this site, Symmetry engaged its engineers to prepare a test-fit plan using the smallest conceivable lot size: 2,000 sq. ft. (40' × 50'). These lot dimensions are far below any typical residential product; by comparison, nearby Tract 23 lots within Pine Canyon generally measure 75' × 100'-150'. A 40' × 50' lot could accommodate only a 30'-35' × 40' home, most likely a one-bedroom, one-bath unit. This home size is typically only found in Build-for-Rent communities, where extensive shared amenities offset the restricted private living area. This site, due to its limited size, steep slopes, and significant resource protection requirements, could not accommodate those amenities (pools, trail systems, parks) without further degrading sensitive resources.

Even under this extreme and unrealistic scenario, the layout failed to meet the slope preservation requirements of the Resource

TOTAL SITE AREA = 4.31 AC

**LEGEND**

- MAJOR CONTOUR
- MINOR CONTOUR
- EXISTING BOUNDARY
- FUTS TRAIL
- GRADING LIMITS
- PROPOSED 40'x50' PARCEL
- 17-25% SLOPE=1.21 AC TOTAL; .56 AC PROTECTED (.85 AC= 70% MIN PER CITY REQUIREMENTS)
- 25-35% SLOPE=.66 AC TOTAL; .38 AC PROTECTED (.53 AC= 80% MIN PER CITY REQUIREMENTS)
- 35%+ SLOPE=.07 AC TOTAL; .05 AC PROTECTED (.07 AC =100% MIN PER CITY REQUIREMENTS)
- MANMADE (CITY ROADWAY, JWP CONSTRUCTION)=.66 AC
- EXISTING TREE



**NOTES:**  
 PROPOSED USE: SINGLE FAMILY RESIDENTIAL  
 EXISTING USE: UNDEVELOPED  
 RESOURCES: IN RESOURCE PROTECTION PLAN, SEE SHEET C3.1 FOR MORE INFORMATION.  
 FINAL LOTS LINES, LOT COUNT, AND SETBACKS BY FUTURE ANALYSIS ASSOCIATED WITH FUTURE DESIGN, AND TO MEET MINIMUMS PER CITY ZONING REQUIREMENTS.

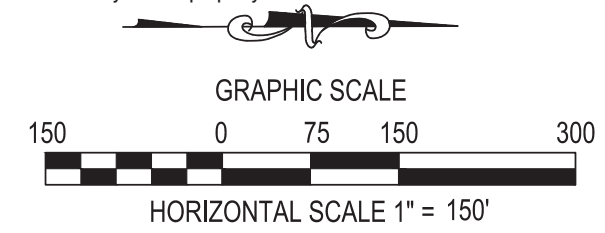
**PROPOSED GRADING INTENT:**  
 -DRIVEWAYS WILL BE GRADE TO CONNECT BUILDING PADS AND GARAGES TO JW POWELL BLVD, WITH A SINGLE JW POWELL BLVD DRIVEWAY CONNECTION.  
 -BUILDING PADS TO SUPPORT THE BUILDING TYPES INTEGRATED INTO THE EXISTING TERRAIN WILL BE GRADED AND COORDINATED WITH THE BUILDING DESIGN.  
 -DETAILS OF GRADING DESIGN AND CONFIGURATIONS WILL BE PART OF OTHER, FUTURE APPLICATION DOCUMENTS. WHAT IS NOTED HERE IS CONCEPTUAL GENERAL INTENT ONLY.

In general grading limits are based on: Road is graded so off-street parking meets City standards for slopes; Road and cul-de-sac meet typical fire truck turning slope limitations; Grading is mostly fill; Lot slopes are at 6% max. This ties building pads to the roadway elevations; Grading limit fill slopes and cuts slopes are based on a 2:1 (typical of City roadway cross sections); and, Terraced walls, meeting City requirements for height and terrace width, are only incorporated where 2:1 fill slopes would extend beyond the property line (i.e. south and east of the cul-de-sac)...walls are not depicted.

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**PINE CANYON TRACT 25  
 PRD SLOPE ANALYSIS EXHIBIT**



DECEMBER 2025

PRD Hypothetical Slope Analysis

Protection Overlay, which mandate preservation of:

- 50% of forest resources,
- 70% of slopes between 17-24.99% (only 46% provided),
- 80% of slopes between 25-34.99% (only 57% provided), and
- 100% of slopes over 35% (only 71% provided).

The engineering analysis confirmed that even attempting to place such minimized lots on Tract 25 triggers unavoidable grading impacts across protected slopes, resulting in RPO non-compliance before considering realistic cut-and-fill requirements. In practice, the grading necessary to make any roadway and building pads compliant would push disturbance well beyond the theoretical lot lines and the roadway envelope, making any R1 development pattern impossible without multiple variances or substantial zoning relief.

Engineering analysis of topography and grading further reinforces this conclusion. To build anything to current City code, the roadway and building pads must be tied to achievable grades. Roadway design must meet standard fire-truck turning slope limitations, requiring carefully controlled grades and a compliant cul-de-sac geometry. Because of the steep natural terrain, most of the required grading would be fill, and building pads must maintain maximum slopes of approximately 6%, a constraint that forces pad elevations to follow roadway elevations. Standard 2:1 cut and fill slopes were used wherever possible, consistent with typical City roadway section assumptions, and in combination with terraced walls in locations where even 2:1 slopes would extend beyond the property boundary, particularly south and east of the depicted cul-de-sac.

Taken together, the extreme lotting scenario and the required roadway and grading design demonstrate that even the smallest lots, placed at maximum density, cannot reasonably comply with R1 or PRD-based R1 standards on Tract 25. The site's topography, slope protection requirements, forest resources, and required roadway geometry make such a pattern fundamentally infeasible.

#### D. Financial Model

Even if the PRD product worked on the site, Symmetry Companies does not construct residential products that fit on 40' × 50' lots, nor would such a product be consistent with the character of Pine Canyon or its Design Guidelines (a requirement of the Flagstaff Subdivision Standards - Lots be designed appropriately for the location and character of the proposed development, street improvements, and underlying topography). The Pine Canyon Guidelines limit each lot to one single-family residence and one guest house, with no more than 50% of the gross lot area—or 10,000 sq ft, whichever is less—disturbed. These requirements make multi-family or micro-lot products impractical or non-compliant. Mountain Vistas at Pine Canyon was developed as a duplex community, however, this community operates under a separate HOA from the rest of Pine Canyon. The duplex lots are also an average size of 50'x115', far larger than the 40'x50' test lots. Development of the same duplex style homes and lot sizes, as this neighborhood would far exceed the resources needed to protect Tract 25.

In addition, Symmetry's financial modeling demonstrates that the highest and best use of the property is a traditional three-lot-subdivision consistent with the surrounding Pine Canyon development pattern. Any attempt to build higher-density housing here would require:

- Extensive grading,
- Maximum slope disturbance,
- Expensive retaining systems,



Photos of the Site

- Roadway widening beyond the city standard cross-section, and
- Product types that Symmetry does not build and that do not meet Pine Canyon's market expectations.

The rezoning to ER-RPO therefore represents the only feasible and environmentally responsible solution, allowing for development that respects the site's limitations, meets the Design Guidelines, and avoids the need for variances, height modifications, or code relief.

Taken together, the parcel's history, original zoning intent, prior development attempts, engineering analysis, and financial feasibility work all support that a three-lot ER-RPO subdivision is the highest and best use of Tract 25. This approach preserves significant natural resources, avoids mass grading, aligns with Pine Canyon's development pattern, and produces a realistic and code-consistent development outcome for one of the community's most constrained parcels.

### E. Regional Plan Overview

The City's 2030 Regional Plan ("Regional Plan") outlines the community's vision for the region's future. It provides a framework for maintaining and improving the community's character and natural environment while accommodating suitable growth and development. This envisioned development has been carefully crafted to support the objectives detailed in the Regional Plan concerning new residential developments within the City's planning boundaries.

The Property is located within the City's Urban Growth Boundary. The Growth Illustration Map within the Regional Plan designates the Property as Suburban-Existing land use, as shown on the Regional Plan— Growth Illustration Map below. The current Regional Plan designation supports residential lots two to thirteen units per acre. Unless the density on this site is calculated using the developable area only, it is impossible given the resources on the site to provide the density needed to develop within the Suburban Neighborhood plan designation. The proposed Regional Plan designation, Rural Neighborhood, supports one house per 1 to ten acres or .2 to 1 units per acre. This site is 4.3 acres. With three (3) proposed lots on 3 acres of land, the proposed density is .69 dwelling units per acre, well within the recommended density of the Rural Neighborhood Regional Plan designation. This modest project has been designed to be developed at a low density to complement and mirror the surrounding development and complies with the Regional Plan, as described below.

A chapter-by-chapter analysis of the Regional Plan against this application has been conducted to support the Project's conformance with the Regional Plan. An analysis is also part of this Application, demonstrating that the development proposal supports and furthers the goals and policies of the Regional Plan—see Appendix A.

## REGIONAL PLAN - GROWTH ILLUSTRATION



Current - Suburban Neighborhood

Requested - Rural Neighborhood

## II. Development Proposal

This proposal divides the parent parcel into three Estate Residential lots, resulting in an overall density of approximately 0.69 dwelling units per acre. Each lot will comply with all applicable Estate Residential development standards in Flagstaff Zoning Code Table 10-40.30.030.C. The site is conceived as a small, low-density enclave of large-lot single-family homes situated on the urban fringe, adjacent to the Coconino National Forest and surrounded on three sides by the Pine Canyon golf course. The development vision emphasizes a semi-rural character, abundant natural resources, and careful stewardship of existing terrain and vegetation.

Given the property's frontage along John W. Powell Boulevard, each homesite will provide pedestrian connections to JWP and Lone Tree Road, offering residents convenient and safe access to the broader Flagstaff Urban Trail System (FUTS) network. This approach ensures that the residential lots integrate seamlessly with the area's existing circulation patterns and regional connectivity.

The project has been intentionally designed to reflect and reinforce the established development pattern of the surrounding area. To that end, the application proposes zoning that is less intensive than the current R1 designation and than what is contemplated under the Regional Plan's existing land use classification. Under R1 standards, the site would be required to accommodate at least nine lots—likely ten—arranged around a cul-de-sac that alone would consume nearly a third of the site's buildable area. The parcel's irregular shape, extensive slope and forest resource protections, and right-of-way/circulation constraints make such a configuration both impractical and environmentally disruptive.

By contrast, the Estate Residential (ER-RPO) zone is uniquely suited to the site's physical conditions and existing context. Three large lots allow development to blend with surrounding custom homes, produce a far more compatible street scene, and preserve the site's most valuable natural resources. This lower-intensity development also minimizes new traffic on JWP, reduces visual impact from public vantage points, and maintains the semi-rural character that defines the southern edge of Pine Canyon.

In summary, this targeted downzoning, paired with a Minor Regional Plan Amendment, establishes a development pattern that is both feasible and environmentally responsible. It enables the creation of three high-quality homes while avoiding unnecessary grading, respecting long-standing forest and slope protections, and ensuring that build-out occurs with the least possible impact on this highly visible, resource-rich outparcel.

### A. Access and Circulation

Access to the Project is planned via a single shared driveway directly off the JWP, as allowed by Engineering Standards, meeting spacing standards per Table 13-10-006-01.

### B. Pedestrian Connectivity

The Project's pedestrian circulation network will ensure that residents are afforded readily accessible and proximate access to amenities, adjoining developments, and the greater regional pedestrian network. Off-site pedestrian access will include the sidewalk along JWP, the FUTS along Lone Tree Road, and trailhead at northeast corner of Lone Tree and JWP.

### C. Resource Preservation

The 4.3 acres contain dense canopy of Ponderosa Pine trees and a significantly sloping terrain. A Slope Analysis is included with this application. These slopes have been surveyed and accounted for as reflected in the analysis. In fact, 1.94 acres of the site make up slopes 17% and over. By code, at least 70%-100% of these 1.94 acres needs to be protected (.85ac 17-25%, .54ac 25-35%, and .07ac 35%+), for a total of 1.46ac of slope protection, making only 2.84 acres of the site acceptable, by city, standards for development. Another .66 acres of the site are made up of manmade slopes created by the JWP construction - making development in those areas unlikely. By developing the site at ER-RPO standards and within the Rural Neighborhood Regional Plan Policies, a majority of the slope and tree resources will remain untouched by the proposed development. If developed under the current code, the site would need to be graded flat and clear cut of its natural resources in order to fit the required nine to ten homes.

### D. Infrastructure and Public Services

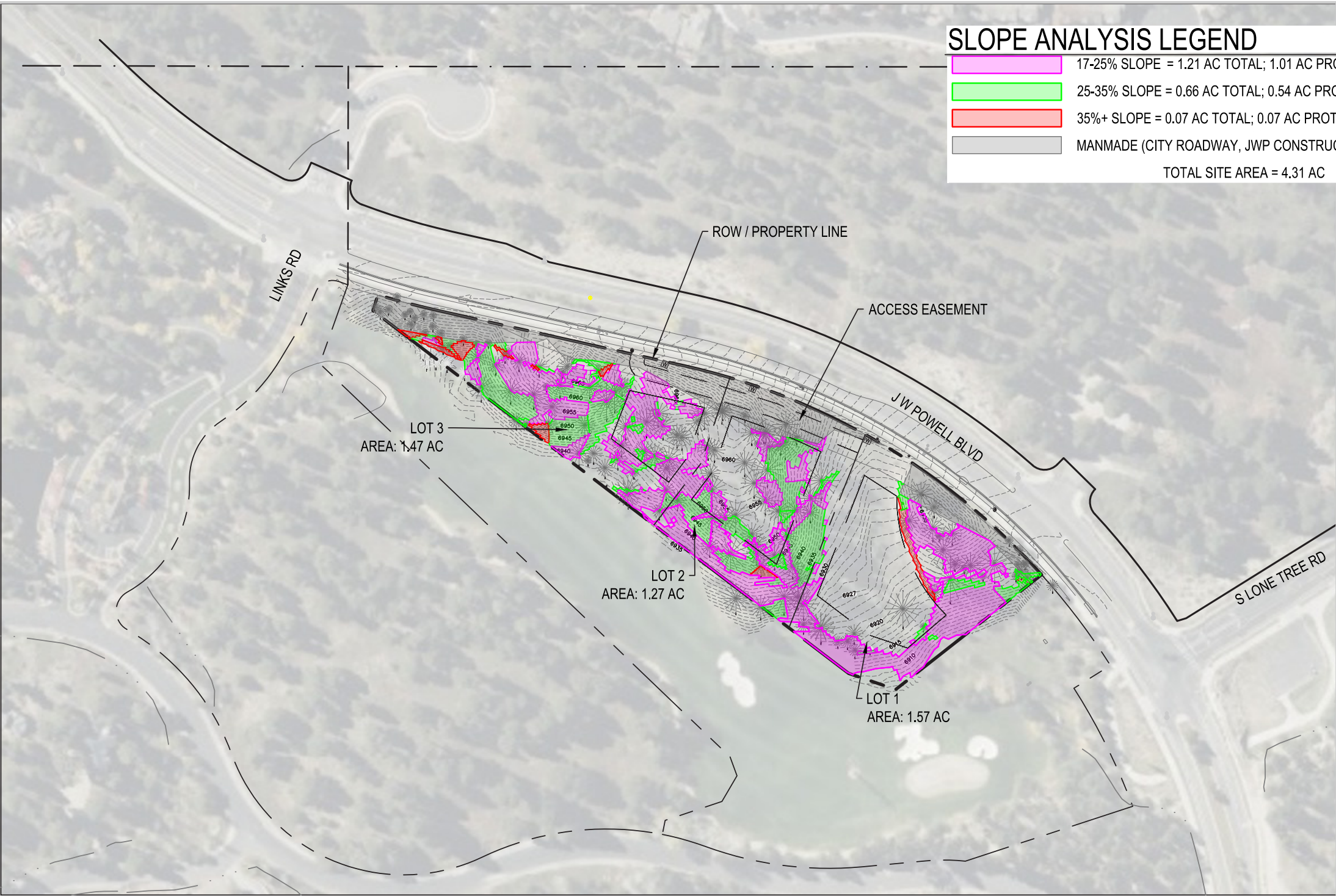
A Water and Sewer Impact Analysis (WSIA) was previously completed by the City for the entirety of Pine Canyon Estates. Water to the site will be provided by an 8-inch water main connecting to an existing 20-inch water main in the JWP. Water meters and domestic service lines will be provided for each lot. Sewer will be provided by an 8-inch sewer main connecting to an existing sewer manhole

**SLOPE ANALYSIS LEGEND**

|  |  |
|--|--|
|  | 17-25% SLOPE = 1.21 AC TOTAL; 1.01 AC PROTECTED (0.85 AC; 70% MINIMUM PER CITY REQUIREMENTS) |
|  | 25-35% SLOPE = 0.66 AC TOTAL; 0.54 AC PROTECTED (0.54 AC; 80% MINIMUM PER CITY REQUIREMENTS) |
|  | 35%+ SLOPE = 0.07 AC TOTAL; 0.07 AC PROTECTED (100% MINIMUM PER CITY REQUIREMENTS)           |
|  | MANMADE (CITY ROADWAY, JWP CONSTRUCTION) = 0.66 AC   |

TOTAL SITE AREA = 4.31 AC

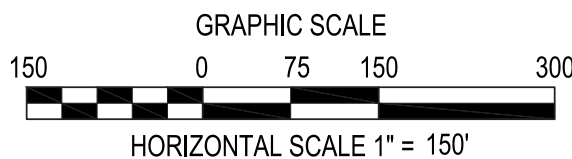
- NOTE:
- DETAILED PROTECTION OF RESOURCES DEPENDANT UPON FUTURE FINAL SITE LAYOUT DESIGN
  - ESTIMATED NUMBER OF LOTS: 1-4
  - TREE PRESERVATION TO MEET MINIMUM REQUIREMENTS AND EVALUATED WITH FUTURE DESIGN



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**PINE CANYON TRACT 25  
 SLOPE ANALYSIS AND RESOURCE PROTECTION**



AUGUST 2025  
 PAGE C3.1

in the JWP. Sewer service will be provided to each lot by 4" sewer services.

## E. Stormwater Management

This property was included in the prior Pine Canyon (previously named Fairway at the Peaks) Master Drainage Plan. This rezone to lower the site density will not increase the intensity of use as provided in the prior drainage plan, and therefore, no additional peak flow mitigation is required, as the site maintains drainage conformance. Stormwater flows will be routed to the east/northeast matching existing drainage patterns.

## F. Utilities

The Property is within the service areas for APS (electric), UniSource (gas), and CenturyLink (communications).

## G. Fire

The City's Fire Department provides fire coverage for the Property. The closest fire station is Station #1, located at 1972 South Thompson Street.

## H. Police

The City's Police Department will be the police protection agency for the Property.

## I. Schools

The project lies within the Flagstaff Unified School District. It is anticipated that elementary age children (K-5) will attend Kinsey Elementary School or Demiguel Elementary School. Middle school age children (6-8) will attend Sinagua Middle School. Flagstaff High School will serve grades 9-12. Approval of this Application will not endanger, jeopardize, or otherwise constitute a hazard to the Property or the surrounding area.

## J. Construction Logistics

The Property is currently undeveloped. It is anticipated that the construction entrance/exit will be provided by the single-shared driveway to the JWP. Residential construction on each lot will be handled per code by each future owner's building permit application.

## K. Phasing

The Property will be developed in one phase.

## L. Project Benefit to Public & Community

Symmetry Companies recognize that quality community and high-quality development shapes the community character, opens-up economic opportunities, and improves livability for all residents. Approval of this project will provide numerous community benefits, including:

### 1. Compatible Land Use Transition

By maintaining a low density, Tract 25 provides a gentle transition in scale and character between the existing Pine Canyon neighborhood, the undeveloped high-density parcel across J.W. Powell Boulevard, and other surrounding zones. This prevents abrupt changes in building height, massing, and traffic intensity.

### 2. Preservation of Open Space, Tree Canopy and Slopes

A three-lot layout leaves significant portions of the 4-acre site undeveloped, allowing for the preservation of mature trees, natural vegetation, and wildlife habitat. In addition, the project can protect and maintain the site's natural slopes, minimizing grading impacts, preventing erosion, and retaining the land's natural form. These measures support the City's resource protection goals, safeguard scenic views, and help maintain the visual character of the corridor.

### 3. Minimal Traffic and Infrastructure Demand

With only three homes, the project generates very low daily vehicle trips and places minimal strain on City infrastructure, water, and sewer systems compared to higher-density alternatives.

#### 4. Protection of Community Character

The design reinforces Flagstaff's established residential identity in the area, complementing Pine Canyon's architectural style, landscape features, and pedestrian-oriented circulation.

#### 5. Opportunity for High-Quality Custom Housing

Large lot sizes allow for custom home development that can integrate sustainable building practices, energy efficiency measures, and context-sensitive design, serving as an example for future infill projects.

#### 6. Increased Property Tax Base with Low Service Burden

Even with just three homes, the development increases the City's tax base while requiring minimal public services, making it fiscally positive for the City.

#### 7. Support for Multimodal Connectivity

The site's proximity to FUTS trails and J.W. Powell Boulevard enables residents to access pedestrian and bicycle routes, encouraging alternative transportation and linking the project to broader community networks.

#### 8. Climate-Responsive Landscaping and Water Use

The project can incorporate native/adapted plantings, and low-impact irrigation systems, aligning with City water conservation policies.

#### 9. Enhancement of Corridor Aesthetics

Through thoughtful site design, landscape buffers, and preservation of natural features, Tract 25 can improve the visual appeal of this portion of the J.W. Powell corridor, supporting its role as a scenic gateway into the City.

#### 10. Complement to Future Housing Diversity in the Corridor

While Tract 25 provides low-density housing, it complements the planned higher-density STL 340 project further down J.W. Powell, collectively ensuring a mix of housing types in the area to meet varied community needs.

Most importantly, the Tract 25 project will develop a vacant, underutilized parcel with a contextually appropriate development that provides additional housing opportunities within the City. As previously mentioned, the Property is currently zoned R1-RP0. It is primarily surrounded by other property zoned Rural Residential (RR), Estate Residential (ER), Single-Family Residential (R1), and Public Lands Forest (PLF). These zones are all highly compatible with a low-intensity, residential development like the proposed Project. In addition, the project is located across J.W. Powell Boulevard from a currently unbuilt high-density residential (HR) parcel. Tract 25 will be compatible with this future development by creating a balanced land use transition across the corridor, supporting multimodal connections through the FUTS trails and pedestrian linkages, and ensuring visual and functional cohesion through landscape buffers, building scale considerations, and coordinated infrastructure. The lower density of Tract 25 will act as a visual and functional buffer between the larger-scale buildings anticipated in the high-density parcel and the established Pine Canyon development. By stepping down in intensity, Tract 25 will help ease the transition in building scale, traffic activity, and neighborhood character, preventing abrupt changes in form and density while still reinforcing a connected community fabric. Further down the J.W. Powell corridor, the proposed STL 340 project will also contribute to a diversity of housing options, complementing Tract 25 and other planned developments, and supporting the City's goal of offering a full range of housing types in connected, well-designed neighborhoods. The proposed use is compatible with the surrounding area, including access, traffic, and a network of FUTS, pedestrian, bicycle, and vehicular circulation; tree resources; landscaping and screening; and efficient use of infrastructure. Approval of the project will serve the public interest, health, safety, convenience, and welfare, and will add to the public good. Development of the Property will enhance the Pine Canyon Estates and positively contribute to the City and community.

### III. Conclusion

This low-density community prioritizes the preservation of trees and natural resources and offers a thoughtful, sustainable approach to growth. By protecting the region's unique forest ecosystems and minimizing environmental impact, such a development enhances resident's quality of life while supporting long-term ecological health. It creates a peaceful, nature connected living environment that fosters well-being, privacy, and a strong sense of place. Economically, it adds lasting value through increased property desirability and reduced infrastructure demands. This type of development not only reflects Flagstaff's commitment to environmental stewardship but also serves as a model for responsible development that balances growth with conservation.

In conclusion, we respectfully request that the City of Flagstaff grant the downzoning and Minor Regional Plan Amendment requested for this property. The current R1 zoning is incompatible given the significant hurdles to apply zoning and development code standards to a property encumbered with significant resources, thereby rendering it undevelopable. The surrounding properties have developed at a lower density, creating a precedent and expectation for properties to provide larger setbacks, more open space, and an abundance of preserved resources and viewsheds. The amount of developable land on this property does not allow for any more density than what is being proposed. This property only makes sense to be developed as three large lots; preserving the natural beauty of the resources on site, and blending seamlessly into the fabric of the existing community.



## Appendix A – Regional Plan Conformance

### i. 11-10.10.020.H Requirements


#### Executive Summary

The Regional Plan provides the City with guiding policies and goals to assist in the decision-making process. This project requests a Minor Regional Plan Amendment from Suburban Neighborhood to Rural Neighborhood. According to the Regional Plan, the current designation, Suburban Neighborhood, supports “Residential lots 2 to 13 units/acre,” and Rural Neighborhood supports “Residential lots typically 1 house per 1 to 10 acres - 0.2 to 1 units per acre. Accessory dwelling units/guest houses and barns allowed.” In addition to the Regional Plan Amendment, this application requests a rezone a from R1 Single-Family Residential to a more fitting and contextually appropriate Estate Residential zoning category. This is consistent with many of the Regional Plan Goals and Policies concerning land

## AREA TYPES




### SUBURBAN NEIGHBORHOOD CHARACTERISTICS

Suburban areas have medium to low densities of people, residences, jobs and activities; the streets and sidewalks vary in pattern; the area is drivable to access homes and jobs, yet walkable by special pedestrian facilities like the Flagstaff Urban Trail System (FUTS); some services and goods are available to the residents; the area may have access to public transportation.

|                            | Existing Suburban<br>*Symbol from Map 22   |  | Future Suburban<br>*Symbol from Map 22 |
|----------------------------|--|---|--|
| Desired Pattern            | Well-connected neighborhoods, designed around an Activity Center.  |   |  |
| Block Size                 | Block size is variable in Suburban Neighborhoods. Blocks are well organized, with few bicycle and pedestrian dead ends. Cul-de-sacs are minimized in the design of new neighborhoods.  |   |  |
| Density Range              | Residential lots 2 to 13 units/acre. Increased density is preferred within pedestrian shed of 6 units/acre +. For a change of density range, a specific plan or development master plan must be developed for the pedestrian shed. Residential Mixed-Use: 6 to 29 units/acre, outside of the pedestrian shed. Increased density closer to transit.   |   |  |
| Intensity                  | Floor area ratios (FARs) of 0.2 and above. Suburban commercial, offices space, medical facilities, and institutional in commercial core of an activity center and along commercial corridors.  |   |  |
| Air Quality                | Consider long-term impacts to air quality by proposed development, see page IV-10.   |   |  |
| Solar Access               | Consider solar access for all development, allowing passive and active solar collection.   |   |  |
| Residential                | Quiet residential neighborhoods, consisting of single-family homes, duplexes, townhouses, and low-rise apartments, located toward the periphery of developed areas of the City. This classification may also include such supporting land uses as parks and recreation areas, religious institutions, and schools. A full range of services and infrastructure is required, including public transit and bike trails.  |   |  |
| Commercial                 | Commercial development in suburban neighborhoods is minimal, such as home-based businesses and childcare. Refer to Suburban Activity Centers table on the following page for more commercial development options   |   |  |
| Public/ Institutional      | Uses like schools and churches create a central and well-connected neighborhood. Refer to Illustration of Suburban Character on pg. IX-48.   |   |  |
| Employment                 | Home-based businesses are appropriate in Suburban Neighborhoods. Industrial uses and Research and Development are not appropriate outside of activity centers.   |   |  |
| Parks                      | Suburban parks and recreation facilities are either publicly or privately owned and allow both active and passive activities, as well as special use functions like recreation centers, golf courses, and swimming pools. This category is inclusive of neighborhood parks, community parks, conservation parks and special purpose facilities. Future park development is contingent upon the density and intensity of proposed development. Refer to Chapter XV - Recreation and the City of Flagstaff and Coconino County Parks & Recreation Master Plans.  |   |  |
| Open Space<br>Public Space | Suburban open space areas are for public or private use. Open spaces include natural areas, greenways, trails, streetscapes, waterways, cemeteries, drainage ways, floodplains, corridors, wildlife refuges, wetlands, riparian areas, and preserves. They are used for passive recreation such as hiking, picnicking, bicycling, horseback riding, and fishing. Open space areas also may be preserved or restored for their aesthetic value, scenic areas and vistas, ecological value, archeological and historical significance, and wildlife habitat. Refer to Chapter IV - Environmental Planning & Conservation and Chapter V - Open Space. |   |  |
| Conservation               | <b>Refer to the Natural Resources maps in Chapter IV - Environmental Planning &amp; Conservation.</b>  |   |  |
| Agriculture                | Food production – yard gardens, community gardens, fruit trees, greenhouses and conservatories, animal husbandry.  |   |  |
| Special Districts          | Airport Business Park – Specific Plan needed; Flagstaff Cultural Center – Specific Plan needed; Coconino Community College campus; Innovation Mesa   |   |  |
| Master Plans               | Canyon del Rio   |   |  |

### RURAL NEIGHBORHOOD CHARACTERISTICS

Rural areas have a low density of people, residences, jobs and activities; paved and unpaved two-lane roads with natural edges; minimal services and goods available to the residents; FUTS connectivity and public transit commuting opportunities may exist; abundant open spaces and agricultural uses.

|   |  |
|---|--|
| <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>Existing Rural<br/>*Symbol from Map 22</p> </div> <div style="text-align: center;">  <p>Future Rural<br/>*Symbol from Map 22</p> </div> </div> |  |
| Desired Pattern   |  <p style="text-align: right; font-size: small;">Photo credit: Coconino County</p>  |
| Block Size  | N/A – Refer to Coconino County Subdivision Ordinance   |
| Density Range   | Non-residential Commercial Uses are minimal and targeted for Rural Activity Centers. Cottage industry and home-based businesses, subject to regulations.   |
| Intensity   | Residential lots typically 1 house per 1 to 10 acres - 0.2 to 1 units per acre. Accessory dwelling units/guest houses and barns allowed.   |
| Air Quality   | Consider long-term impacts to air quality by controlled burns and use of wood stoves.  |
| Solar Access  | Consider solar access for all development, allowing passive and active solar collection.   |
| Residential   | Low-density, large lot, single-family homes in a rural setting found primarily on the urban fringe, abutting national forest land. The character of development is rural, with retained natural features and agricultural uses. Where sanitary sewer and potable water services are available, zoning may permit development of one acre lots. Rural development may be clustered to maximize protection of natural resources and open space. Typically surrounded by public lands, served by non-maintained roads and have no or limited public services. |
| Commercial  | Commercial at intersections of major roads and rural activity centers. Home-based businesses – subject to regulations. Refer to Rural Activity Centers table on the next page.   |
| Public/ Institutional   | Public and quasi-public spaces are often open space, parks, schools, churches, and fire stations.  |
| Industrial/ Business Park   | Limited infrastructure is a barrier to Industrial and Business park opportunities.   |
| Parks   | Rural parks and recreation facilities are either publicly or privately owned and allow both active and passive activities, as well as special use functions like recreation centers, golf courses, and swimming pools. This category is inclusive of neighborhood parks, community parks, conservation parks and special purpose facilities. Future park development is contingent upon the density and intensity of proposed development. Refer to Coconino County Parks & Recreation Master Plan.  |
| Open Space  | Rural open space is public or private and primarily undeveloped landscape that provides scenic, ecological, or recreational opportunities, or are set aside for resource protection/conservation. Rural open Space includes areas of managed production such as forestland, rangeland, or agricultural land that is essentially free of visible obstruction.   |
| Conservation  | Refer to the Natural Resources Maps 7 and 8 for more information about wildlife corridors, habitat, meadows, soils, etc.   |
| Agriculture   | Food production, farming and ranches, equestrian activities, and animal husbandry  |
| Transportation  | Mostly auto mobiles, some public transit/ bike pedestrian opportunity but not a focus. Plenty of parking. Mix of public and private roads. Rural roads.  |
| Special District  | Fort Tuthill Master Plan and Landfill  |
| Master Plans  | County Area Plans: Doney Park, Timberline-Fernwood, Kachina Village Fort Valley, and Mountainaie   |

use, community character, environment, and housing, as described in detail below and as show in the Characteristic Charts included in the following pages.

Tract 25 is consistent with the City’s definition of Rural Neighborhood in several ways:

- **Low Density:** The proposed 3-lot subdivision results in approximately 0.69 dwelling units per acre, which is well within the low-density range expected of rural areas. This pattern also mirrors the existing character of Pine Canyon, which is relatively low density compared to other neighborhoods in Flagstaff.
- **Roadway Context:** The site is accessed from John Wesley Powell Boulevard (JWP), a two-lane roadway consistent with rural character. While JWP does not have a “natural edge” throughout, it terminates directly into National Forest land, reinforcing the rural edge condition.

- Proximity to Open Space: The property is directly adjacent to extensive open space, including undeveloped land and National Forest to the east. This relationship provides the abundant open space and natural backdrop that define Rural Neighborhoods.
- Lack of Adjacent Commercial Services: There are no commercial uses, and few activities located directly adjacent to the site. The property is primarily located in a residential area of town. This separation from urban services is consistent with rural character.
- Transit and Connectivity: JWP currently has no public transit service, which is characteristic of rural neighborhoods. While future transit service may be extended, the property's current condition reflects the rural standard of limited connectivity and reliance on personal vehicles or bicycles.

In combination, these factors demonstrate that Tract 25 embodies the intent of the Rural Neighborhood designation—providing low-density residential development in a setting defined by open space, forest adjacency, and minimal or yet to be developed / extended urban services.

### Site Analysis

An analysis of the site has been conducted to evaluate its physical characteristics, the surrounding land uses within 1,000 feet of the subject property, and the existing character of the broader area. This analysis has been included as a part of Section II – Site Analysis.

### Land Use Analysis

This amendment is necessary to ensure that the development pattern reflects the optimal use of land and resources while supporting long-term community and regional planning goals. The proposed amendment for Tract 25 seeks to reduce the residential density from R1 (2–5 dwelling units per acre) to Estate Residential (ER) with 0–1 dwelling units per acre due to site conditions that make higher-density development incompatible, including an abundance of natural resources and significant slopes exceeding 17%. This change revises the existing single-family residential designation to support fewer, single-family homes thereby preserving the low-density character and environmental integrity of the area. Development is expected to occur in a single phase over 2 to 5 years, with minimal internal road improvements due to the decreased density. Pedestrian access is designed through the adjacent FUTS trails. Natural buffering techniques such as landscaping and setbacks will ensure smooth transitions to adjacent properties, effectively minimizing any land use incompatibilities. Overall, the amendment prioritizes preservation, environmental quality, and compatibility with surrounding neighborhoods while responding to site-specific constraints.

### 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 the 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 meets 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.

#### Supported 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.

Response: Tract 25 supports this policy by preserving the site's natural features and steep slopes, allowing the natural landscape to remain a defining element of the built environment. The reduced density and larger lot sizes ensure that development is sensitive to and integrated with the natural setting at multiple scales.

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

Response: The amendment protects cultural and natural resources by limiting development intensity, thereby safeguarding existing wildlife corridors and minimizing disturbance to sensitive habitats within the tract.

Policy LU.13.1. Prioritize connectivity for walking, biking, and driving within and between surrounding neighborhoods. .

Response: Tract 25 supports connectivity by providing direct access to the FUTS trail, which runs along the project boundary, enhancing opportunities for walking, biking, and driving between surrounding neighborhoods and open spaces.

Policy E&C.71. Design development proposals and other land management activities to minimize the alteration of natural landforms and maximize conservation of distinctive natural features.

Response: By reducing density and limiting site disturbance, Tract 25 minimizes alteration of natural landforms, preserving slopes and other distinctive natural features, and maximizing conservation throughout the development process.

#### Unsupported Policies:

Policy E&C.1.5. Seek feasible alternatives to reduce the smoke produced through prescribed burns and slash piles while continuing efforts to return fire to its natural role in the ecosystem.

Response: Tract 25 does not involve land management practices like prescribed burns or slash pile reduction; therefore, it neither addresses nor implements alternatives to reduce smoke from these activities.

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.

Response: Tract 25 is a development-specific document, not a regulatory framework. It does not review, revise, or set citywide codes or ordinances related to climate change vulnerability.

Policy CC.2.4. Support restoration and rehabilitation of historic housing, buildings, structures, and neighborhoods.

Response: Tract 25 is new development on previously undeveloped land and does not involve historic properties or structures. No historic preservation elements are integrated.

Policy LU.1.1. Plan for and support reinvestment within the existing city centers and neighborhoods for increased employment and quality of life.

Response: Tract 25 develops a new area rather than reinvesting in existing city centers or neighborhoods, which is inconsistent with this policy's intent.

Policy NH.3.4. Reuse former brownfields, vacant buildings, and commercial buildings to provide new mixed-use and/or housing options.

Response: Tract 25 develops previously undeveloped land rather than redeveloping brownfields, vacant buildings, or commercial spaces.

The Tract 25 rezone is focused on new low-density development in a designated growth area. Many of the policies listed above relate to:

- Citywide regulatory changes (e.g., codes, ordinances)
- Historic preservation
- Downtown reinvestment
- Brownfield redevelopment

Because the Plan does not encompass these elements, it does not directly support or implement these policies.

#### Cumulative Impact – Future Growth Illustration

The proposed amendment for Tract 25 to reduce residential density aligns with the FutureGrowth Illustration by limiting development intensity in sensitive areas, thereby helping to balance growth across the City. This reduction in density supports preservation of natural resources and open space within the area, reducing cumulative impacts such as increased traffic, infrastructure demand, and environmental degradation. By maintaining lower density estate residential uses, the proposal contributes to protecting the character of established neighborhoods and natural landscapes while accommodating growth in more appropriate locations, helping to achieve the City's broader land use and sustainability goals.

### Cumulative Impact – Land Supply

The proposed downzoning and Minor Regional Plan Amendment of Tract 25 from R1 to Estate Residential (ER) results in a modest reduction of approximately six residential units within the City's overall land supply. However, this decrease is minimal when viewed in context with nearby development, such as the STL 340 project located just down the street. STL 340 proposes to rezone approximately 163 acres to R1, allowing for 494 units, along with an additional 23.47 acres rezoned to MR for 222 units, substantially increasing housing capacity in the area. The STL 340 development offers a range of housing types, including single-family homes, townhomes, and multifamily units, addressing a variety of community needs and contributing to a balanced housing market. Therefore, the loss of six units from Tract 25's downzoning is insignificant in the broader housing supply picture and is balanced by the larger-scale growth occurring nearby, ensuring overall housing availability and diversity within the City.

### Transportation Impacts

The transportation impacts of the Tract 25 project are expected to be minimal due to the significant reduction in residential density from Single Family to Rural and R1 to Estate Residential (ER). With fewer dwelling units proposed, traffic generation will be substantially lower compared to the original zoning designation. Existing roadway infrastructure is adequate to accommodate the anticipated low traffic volumes, requiring only minor or no improvements to internal circulation. Additionally, the project's proximity to the FUTS trail along its boundary enhances non-motorized transportation options, encouraging walking and biking connectivity to surrounding neighborhoods and recreational areas. Overall, the Tract 25 development is designed to maintain safe and efficient circulation while minimizing impacts on the local transportation network.

### Impacts on Housing

The proposed MRPA of Tract 25 from Single Family to Rural / R1 to Estate Residential (ER) results in a reduced number of housing units, reflecting a shift toward larger lots and lower density development. While this means fewer total homes on the site, the amendment benefits the housing market by preserving a unique option for estate-style living, catering to households seeking larger properties and more privacy. This diversification of housing types complements nearby higher-density developments, such as STL 340, which adds significant numbers of single-family, townhome, and multifamily units. Together, these developments support a balanced and varied housing supply within the community, addressing different preferences and needs.

### Impacts on Implementation of the General Plan

The proposed MRPA and down-zone of Tract 25 from Single Family to Rural and R1 to Estate Residential (ER) supports the implementation of the General Plan goals and policies by promoting the preservation of natural resources and maintaining the area's rural character. This aligns with policies encouraging sensitive development that respects natural landforms, slopes, and wildlife corridors, thereby enhancing community character and environmental quality. By reducing density, the proposal helps protect open space and minimizes infrastructure demands, consistent with sustainability goals. Additionally, the project complements broader housing strategies by contributing estate-style housing options while nearby developments provide increased density and housing diversity, together fostering balanced growth in accordance with the General Plan.

## **ii. Goal and Policy Analysis**

### Environmental Planning and Conservation

**Goal E&C.2.** Reduce greenhouse gas emissions.

**Policy E&C.2.1.** Encourage the reduction of all energy consumption, especially fossil-fuel generated energy, in public, commercial, industrial, and residential sectors.

**Response:** Tract 25 supports Goal E&C.2 to reduce greenhouse gas emissions by promoting a low-density, estate residential development that preserves natural open space and minimizes site disturbance. The reduced density limits additional vehicle trips and energy-intensive infrastructure, thereby decreasing overall fossil-fuel consumption associated with transportation and utilities. Additionally, the project's proximity to the FUTS trail encourages alternative transportation modes such as walking and biking, further

reducing reliance on fossil fuels in the residential sector. Through these measures, Tract 25 contributes to energy conservation and the reduction of greenhouse gas emissions in alignment with Policy E&C.2.1.

**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.5.3.** Continue to enforce dark sky ordinances.

**Response:** The project will comply with all applicable dark sky regulations as required by City code, ensuring that exterior lighting is designed and installed to minimize light pollution. With only three homes on four acres, the low-density design will inherently generate less overall lighting, further supporting the preservation of Flagstaff's dark skies as a valued natural resource and community asset.

**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.6.8.** 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:** Tract 25 meets Goal E&C.6 and Policy E&C.6.8 by designing a low-density, three-lot subdivision that minimizes land disturbance and retains much of the site's natural vegetation, tree canopy, and slopes. By preserving large portions of the property in their natural state, the project maintains existing native plant communities and provides habitat continuity for local wildlife. Any disturbed areas necessary for improvements, such as driveways or utility connections, can be replanted with native, drought-tolerant species that are well-adapted to the Flagstaff region's climate, ensuring long-term sustainability with minimal irrigation needs. This approach protects and enhances ecosystem health while maintaining plant and animal diversity, in line with the City's ecological goals.

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

**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:** This project is truly encumbered by natural resources, slopes in particular. Nearly half of the site contains slopes greater than 17%. The site was not made to hold nine to ten dwelling units, and yet, the code and the Regional Plan have minimum densities each development has to meet. By working with the land instead of against it, as Policy E&C.7.2 suggests, we get a development that is much more compatible with the surrounding community and conserves the visual and environmental resources core to Flagstaff's character. Since Flagstaff does not allow for any type of mechanism to calculate density by developable area, a Minor Regional Plan Amendment and down zoning to ER-RPO is necessary to meet necessary City codes and ordinances.

### Community Character

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

**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.

**Response:** Flagstaff's natural setting and dramatic views call for space and conscious development, not density for the sake of density. The Regional Plan states, "Community character is the combination of qualities and assets that establishes our unique sense of place and promotes a high quality of life for our residents and visitors." Suppose the City of Flagstaff demands two dwelling units per acre on this site, there would be no room for views, or trees, or slopes. This extreme density does not match the surrounding community character of the land around the site, and it does not support the city's goals for environmental preservation. The proposed low-density development, with three lots, is more fitting with the forested nature of this part of the city.

**Goal CC.3.** Preserve, restore, enhance, and reflect the design traditions of Flagstaff in all public and private development efforts.

**Response:** Tract 25 meets Goal CC.3 by incorporating a low-density design that is sensitive to Flagstaff's established development patterns, natural setting, and architectural traditions. The project's large lot sizes, preservation of mature tree canopy, and protection of natural slopes reflect the community's historic emphasis on blending development with the surrounding landscape rather than

dominating it. Building designs can incorporate materials, colors, and forms that complement Flagstaff's mountain-town character, ensuring that the new homes harmonize with the natural environment and nearby neighborhoods. By balancing modest development with substantial open space preservation, Tract 25 enhances the community's visual identity while respecting the design traditions that contribute to Flagstaff's unique sense of place.

**Goal CC.4.** Design and develop all projects to be contextually sensitive, to enhance a positive image and identity for the region.

**Policy CC.4.3.** Employ design solutions that balance the interface of the natural and built environments, with the most urbanized core activity areas being the most built, and the most rural areas being the most natural.

**Response:** This site fits perfectly with Policy CC.4.3., it requires a design solution specific for the most natural area of town. This site cannot accommodate the same development standards applied to "normal" urban sites. The standard two dwelling units per acre would destroy the natural features of this site. A more nuanced approach to development, as the Regional Plan suggests, is needed in order to develop rural and resource rich sites such as this one.

### Growth Areas and Land Use

**Policy LU.1.6.** Establish greater flexibility in development standards and processes to assist developers in overcoming challenges posed by redevelopment and infill sites.

**Response:** This is the final parcel of the Pine Canyon Master Plan and yet the City has rendered it undevelopable by its zoning code due to stringent development standards. This infill site, due to its excessive environmental challenges, requires flexibility, a tool the City claims to have in its tool box. This land would be much better served with three lots, than the nine-ten the code is requiring.

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

**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:** This site is within Flagstaff's Urban Growth Boundary, aims to protect the sites natural resources, and provide access to shared and existing infrastructure.

**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.3.3.** Protect sensitive cultural and environmental resources with appropriate land uses and buffers.

**Policy LU.3.4.** Promote transitions between urban, suburban, and rural areas with an appropriate change in development intensity, connectivity, and open space.

**Response:** Rural areas have a range of densities; the Regional Plan recognizes this and supports the differences between the needs of different areas of Town. Some places can handle and should support a higher density. Still, as the land becomes more forested, especially where it abuts more rural and National Forested areas, these parts of the community should be scaled way back in terms of density. This site contains environmental resources that should be protected and developed differently from other sites. For that reason, over half of the site has been preserved. This rezone looks for flexibility, just as Policy LU.1.6. suggests, in overcoming the difficulty in developing an infill site with an overly encumbered environmental site. Meeting the density of the Suburban Neighborhood land use is incompatible with this site, and therefore, a Minor Regional Plan Amendment to Rural Neighborhood is necessary.

### Transportation

**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:** Residents will have access to the newly built sidewalks, FUTS, and bike trails along the JWP and Lone Tree Road networks, allowing residents to use alternative forms of transportation and potentially reduce vehicular use and traffic as a result.

## Cost of Development

**Goal CD.1.** Improve the City and County financial systems to provide for needed infrastructure development and rehabilitation, including maintenance and enhancement of existing infrastructure.

**Policy CD.1.5.** Require that new development pay for a fair and rough proportional share of public facilities, services, and infrastructure.

**Response:** This project will pay its fair and rough proportional share of public facilities, services and infrastructure as needed to serve the site. With only three lots, this site will not be a burden on the City's infrastructure.

## Neighborhoods, Housing & Urban Conservation

**Goal NH.6.** Neighborhood conservation efforts of revitalization, redevelopment, and infill are compatible with and enhance our overall community character.

**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.

**Response:** This project is an infill project; this out-parcel was never developed with the rest of Pine Canyon Estates and was left vacant due to the burdens of the zoning code's density requirements on the site. The project is now moving forward with a lower density within the context of the greater neighborhood and forested/resource rich context.

## Recreation

**Goal REC.1.** Maintain and grow the region's healthy system of convenient and accessible parks, recreation facilities, and trails.

**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.

**Response:** This project is in an incredible location for outdoor enthusiasts. Near the site, residents can access several trailheads or visit parks and outdoor areas, including a portion of the Arizona Trail that runs not far from the project site. Though the actual project site is small, the residents' access to outdoor areas and recreational sites in the Flagstaff and Northern Arizona Region is endless.



**symmetry**  
COMPANIES