

PLANNING AND DEVELOPMENT SERVICES REPORT
DIRECT TO ORDINANCE ZONING MAP AMENDMENT

PUBLIC HEARING
PZ-25-00124-04

DATE: April 22nd, 2026
MEETING DATE: May 13th, 2026
REPORT BY: Bethan Heng

REQUEST:

A modification of a Direct to Ordinance Zoning Map Amendment requested by Lauren McCauley, on behalf of the property owner RE Asset Management, LLC, of approximately 18.24 acres located at 6500 E Route 66, APN 113-07-003S with the Heavy Industrial (HI) zone with the Resource Protection Overlay (RPO). The applicant is requesting to modify the conditions of the prior rezoning for the purpose of allowing a Concrete Batch Plant on site, considered a General Heavy Industrial use.

STAFF RECOMMENDATION:

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

1. The subject property must be developed in accordance with the approved site plan and conditions of approval dated March 18, 2026. Modifications (other than minor modifications) to the approved site plan will require an amendment to the Direct to Ordinance Zoning Map Amendment.
2. All other requirements of the Zoning Code and other City codes, ordinances, and regulations shall be met by the proposed development.
3. All terms, conditions, and restrictions detailed within the previous Direct to Ordinance Zoning Map Amendment must be fully satisfied.

PRESENT LAND USE:

The subject property ("Property") is an approximately 18.24-acre parcel that has historically been used as a volcanic cinder mine and established as a contractor yard from the previous rezone.

PROPOSED LAND USE:

The applicant proposes to establish a concrete batch plant, which is considered a General Heavy Industrial use. General Heavy Industrial is a permitted use in the HI zone.

NEIGHBORHOOD DEVELOPMENT:

See the attached area context map.

North: Mining land owned by RE ASSET MANAGEMENT, LLC, zoned Rural Residential (RR)
East: Mining land owned by RE ASSET MANAGEMENT, LLC, zoned Rural Residential (RR)
South: Coconino National Forest, zoned Public Lands Forest (PLF) and right-of-way
West: City of Flagstaff wastewater treatment plant, zoned Public Facility (PF)

I. Project Introduction

A. Background/Introduction

The applicant, Lauren McCauley, is requesting to modify the Direct to Ordinance Zoning Map Amendment on behalf of the property owner, RE ASSET MANAGEMENT, LLC, to General Heavy Industrial use located at 6500 E Route 66. This amendment would allow the applicant to establish a concrete batch plant, which is considered a General Heavy Industrial use. The concrete batch plant will be placed on yard 15, with yard 14 to include outdoor storage to serve the batch plant. The subject property had received approval for a Direct to Ordinance Zoning Map Amendment to the HI zone with a RPO for construction storage/supply yards with the intent to lease land for equipment and material storage

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in April of 2024. This current request is to include the proposed use of a concrete batch plant to the permitted uses as allowed by the previous zoning map amendment.

The subject property is located near the eastern border of the City Limits, off Route 66. Primary access to the site is through an access easement through the Coconino National Forest off Route 66. A public utility easement exists on the property to the West of the subject parcel (APN 113-07-004, owned by The City of Flagstaff) and grants permission to RE Asset Management, LLC for ingress and egress to the subject property. A portion of the site had previously been utilized for mining. The site currently has two buildings on site, one shop and one double-wide trailer that is being utilized as an office. The site also includes 15 contractor yards on the portion of the site that is no longer viable for mining.

II. Site Plan

On January 2, 2026, the Inter-Department Staff (IDS) approved the Site Plan and deemed the rezoning application to be complete.

A. Zoning – City of Flagstaff Zoning Code

If this modification to the Direct to Ordinance Zoning Map Amendment request is approved, a concrete batch plant will be allowed on the site. Development of the site will be required to comply with the standards of the Zoning Code and with the approved site plan.

i. Site Planning Standards

Due to the nature of the uses proposed for the site, the lack of new buildings being proposed, and the movement of heavy machinery around the site, there were no requirements from the Site Planning Design Standards that apply to this site. In addition, industrial uses not located in the Research and Development zone are exempted from Site Planning Design Standards.

ii. Resource Protection

There is a Resource Protection Overlay zone on the subject site. However, since the site has historically been used as a mine, there are no resources on the site to protect. The proposed zoning for the site will retain the Resource Protection Overlay for consistency.

iii. Open Space & Civic Space

The proposed use does not require either open space or civic space.

iv. Pedestrian and Bicycle Circulation Systems

There are no proposed pedestrian or bicycle facilities proposed as part of this application.

v. Compatibility and Architectural Design Standards

There are no large structures on site that would require Architectural Design Standards as part of this application. In addition, industrial uses and buildings outside of the RD zone and business parks are not required to apply Architectural Design Standards.

vi. Landscaping

It was previously determined during the Direct to Ordinance Zoning Map Amendment application from April 2024 that no landscaping would be required as part of this application.

vii. Outdoor Lighting

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

viii. Parking

Due to the nature of the development, there are no required parking spaces for the proposed concrete batch plant. However, the applicant is proposing 3 new parking spaces to serve lots 14 and 15 – 2 parking

spaces for employees and 1 parking space for customers.

ix. **Historic/Cultural Resources**

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

B. **Public Systems Impact Analysis**

i. **Traffic/Right-of-Way Impact**

A Traffic Statement was sealed on September 15, 2025, and approved on January 12, 2026. Per the submitted traffic statement, it was determined that a left turn lane was warranted for the site based on projected site traffic and existing trips already utilizing the driveway. Route 66 is classified as a minor arterial, and the City's cross-section for this classification includes left turn lanes. From an operational and safety standpoint, modifying the rezone to allow the addition of a concrete batch plant incurs a left-turn lane due to the construction operations, the heavy vehicles proposed to use the driveway, and overall safety considerations.

ii. **Water and Wastewater Impact**

A Water and Sewer Impact Analysis (WSIA) was completed on December 2, 2019, and approved by city staff. The City constructed a 12" water main along Route 66 to the intersection of El Paso Flagstaff Road. The developer constructed a looped waterline extension with an 8" waterline. This loop runs from El Paso Flagstaff Road to the property frontage, at which point two service lines were installed. One runs east to service two buildings, and the other runs north to service another building. These two lines each have fire hydrants installed for fire protection.

Staff determined it was not feasible to construct a sewer main and that the existing septic on site was acceptable for the intensity of the use at the time of the original Direct-to-Ordinance Zoning Map Amendment in April 2024. The WSIA completed and approved by city staff on December 2, 2019, confirmed that a sewer extension would not be required for this project.

iii. **Stormwater Analysis**

A drainage statement was not required for the site plan of this application. An existing stormwater collection area is located on the east side of the site.

III. **Direct to Ordinance Zoning Map Amendment**

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

Direct to Ordinance Zoning Map Amendments shall be evaluated based on the following findings:

A. **Finding #1:**

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

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

When staff performs a Regional Plan (the "Plan") analysis, staff reviews all maps, text, and goals and policies to

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

The subject property is designated as a Future Employment area type. An Employment Center may include mixed-use; research and development offices; medical offices; office space; business park; retail, restaurant, and tourism center; light-industrial; heavy-industrial; and live-work spaces. The proposed General Heavy Industrial use, in addition to the established contractor yards, for this site allows the City to work further towards establishing the area as a place for Industrial uses – bringing the area into compliance with the Regional Plan.

ii. Applicable General Plan Goals and Policies

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

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

The subject property is located near Picture Canyon Reserve, but is on land that, historically, has been operating as a mine. The proposed use of a Concrete Batch Plant will be an addition to an existing contractor lease yard.

Goal E&C.5 aims to preserve dark skies as an unspoiled natural resource and a core element of community character. As part of this redevelopment, any additional lighting on site will need to be submitted for an outdoor lighting permit to meet the current code.

Policy E&C.1.1 encourages strategies and partnerships to mitigate dust. The existing contractor yard, where the concrete batch plant is intended to be located, is covered with a cinder base to prevent dust and mud on the site.

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

Policy WR.2.2 encourages maintenance and facilities to provide reliable, safe, and cost-effective water, wastewater, and reclaimed water services. This application proposes a use within the scale of the original zoning map amendment. The applicant was allowed a WSIA waiver as the water demand for the proposed use remained within the scale of the 2019 Wildcat WSIA.

Policy WR.3.2 encourages low-water-consuming businesses and industries over water-intensive uses. The proposed use will be operated on a site designated as a storage yard for local contractors. The only water needed on site will be for fire protection. This project will require between 7,000 and 10,000 gallons per day. A 5,000-gallon water tank is proposed for this site to support the usage of the concrete batch plant. The Water Services department determined that the WSIA performed in 2019 was sufficient to request a waiver for the WSIA requirements for this application. Since the applicant intends to lease a portion of the property for the temporary use of a concrete batch plant, the project intends to utilize portable toilets on site, in lieu of extending sewer services to the site. The impact on water use on the site is minimized as further wastewater infrastructure will not be demanded by the project.

Policy WR.5.3. aims to have developments identify downstream impacts as a result of development and provide for mitigation measures to address the impacts. The original zoning map amendment required that the leases have

stipulations that restrict the storage of hazardous liquids on-site. Lessees are also required to maintain their vehicles so they do not leak or spill contaminants on the property. These restrictions apply to the current application. This was not a stipulation of the original rezone and is intended to be handled between the lessor and the lessees.

c. Energy (Energy Efficiency and Renewable Energy)

Goal E.1 encourages increasing energy efficiency and Policy E.2.1 aims to promote renewable energy sources that reduce demand upon fossil fuels and other forms of generation that produce waste. The establishment of the contractor yards through the previous rezoning provide a central location to group the heavy industrial equipment in the city. The proposed use of the Concrete Batch Plant is proposed for an area within the City that allowed for a centralized and efficient location for heavy industrial uses.

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

Policy LU.6.2 encourages 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. Specific to this application and its site, the proposed industrial use is located within a designated Future Employment area as per the 2030 Regional Plan. In addition, the Concrete Batch Plant is proposed for a site intended for industrial uses through the establishment of a contractor lease yard. This application proposes a further avenue for employment within the City of Flagstaff, within an area intended for a concentration of industrial uses.

Policy LU.7.3. requires development proposals to address the availability of adequate public services. The applicant was required to extend a waterline to the property to ensure that proper water and fire control was provided during the previous rezone application. This application does not trigger further public improvements beyond what had been previously approved.

Goal LU.16 aims to 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. Similarly, Policies LU.16.1-5 all encourage the establishment of industrial uses in areas that are compatible with the surrounding development. This application proposes a Concrete Batch Plant within an established contractor yard, intended for heavy industrial uses. The site is located in an area near a volcanic cinder mine as well as a wastewater treatment plant. This application places an industrial use in an established and centralized area for industrial uses. There are few residential areas in the direct vicinity of the site.

e. Economic Development

Policy ED.3.8. aims to protect existing business and industrial land uses from encroachment and allow for their expansion. The proposed concrete batch plant will contribute to the local economy of industrial businesses within the City and within an established area for industrial uses.

Goal ED.9 aims to promote redevelopment and infill as a well-established means to accomplish a variety of community economic, planning, and environmental goals. The City has aimed to establish and sustain heavy industrial uses within town, even as vacant industrially zoned parcels become harder to locate. The subject property is an intended space for various contractors and equipment storage, which provides an area to meet the needs of today's industry. The concrete batch plant is a contributor to the intended function of the site, utilizing the opportunity offered by the area as an industrial center.

B. Finding #2

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

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

Staff believes that the proposed project will contribute to the public good and benefit the larger community. Prior to the establishment of the contractor yard, the site had been operating as a nonconforming industrial site, requiring code compliance attention to several violations. The applicant had taken steps towards bringing the previous volcanic cinder mine into conformance through a zoning map amendment, establishing the site as a contractor lease yard. Establishing the site as a Heavy Industrial (HI) contractor lease yard provided an additional supply of industrial land to the City of Flagstaff real estate market, a zoning district that had historically been difficult to find land already zoned for within the City jurisdiction. Furthermore, the establishment of a contractor lease yard allowed for a concentration of future industrial uses within the City jurisdiction, which lends to the intentional placement of future land uses within the City. By mindfully placing similar land uses within the City, the visual, auditory, and character impact of the introduced use within the City can be minimized. In particular, the concrete batch plant is being placed within this established contractor yard for intended industrial uses. In addition, it is intended to be placed in yards 14 and 15, which are located to the Northwest of the site and behind existing industrial uses already established on the site. Its visual impact from the public right-of-way is minimized.

The establishment of a concrete batch plant at the proposed site will also contribute to the community benefit by introducing an additional opportunity for employment and act as an economic stimulus. The City of Flagstaff is an active hub for development, construction, and ongoing improvements at the commercial and residential scale. The introduction of a concrete batch plant will benefit the existing industry by bringing production of a demanded material to the local scale.

C. Finding #3

To meet the finding, the affected site must be determined to be physically suitable in terms of design, location, shape, size, and operating characteristics; and the provision of public and emergency vehicle access, public services, and utilities must ensure that the requested zone designation and the proposed or anticipated uses and/or development will not endanger, jeopardize, or otherwise constitute a hazard to the property or improvements in the vicinity in which the property is located.

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

IV. Citizen Participation

Public hearings before the Planning and Zoning Commission and City Council are conducted in conjunction with requests for Zoning Map Amendments. In accordance with Arizona State Statute, notice of the public hearing was provided by placing an ad in the Arizona Daily Sun, posting notices on the property, and mailing a notice to all property owners within 300 feet of the site excluding rights-of-ways.

The applicant held one neighborhood meetings via Microsoft Teams regarding this case. The meeting was held virtually on February 18, 2026. The meeting was attended by the applicant's team and had no attendees. Since the first neighborhood meeting had no attendees, the second neighborhood meeting was requested by the applicant to be waived, which was granted by the Planning and Development Services Director.

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

STAFF RECOMMENDATION:

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

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1. The subject property must be developed in accordance with the approved site plan and conditions of approval dated March 18, 2026. Modifications (other than minor modifications) to the approved site plan will require an amendment to the Direct to Ordinance Zoning Map Amendment.
2. All other requirements of the Zoning Code and other City codes, ordinances, and regulations shall be met by the proposed development.
3. All terms, conditions, and restrictions detailed within the previous Direct to Ordinance Zoning Map Amendment must be fully satisfied.

Attachments:

- Application
- Project Narrative and Regional Plan Analysis
- Legal Description
- Site Plan
- Vicinity Map
- Neighborhood Meeting Plan
- Record of Proceedings
- WSIA
- Traffic Impact Statement
- Ord. 2024-10