

## Comments from Chapter 3 Minor Plan Amendment - 30 day review

Topic	Comment	Response
<b>General</b>	<p>Please add a language definition everywhere a map is referenced, i.e., Map 25 (Road Network Illustration).</p> <p>People will not have map definitions memorized especially if one only references the document sporadically.</p>	
<b>General</b>	<p>there are basic spelling and grammatical errors</p>	<p>These will be corrected in the final between Planning and Zoning and City Council Review.</p>
<b>Neighborhood preservation</b>	<p>Where activity centers are defined next to, or part of a neighborhood, the neighborhood should be involved in the process</p>	<p>Requirements for notification of rezoning, annexation and plan amendment requests ensure that nearby residents are involved in the process. We have added a criteria related to the neighborhood area type.</p>
<b>Neighborhood preservation</b>	<p>I agree generally. I think there needs to be greater protections for neighborhoods. Development proposals visa-vis neighborhood protections feels very lopsided toward development proposals.</p>	<p>We have added a criteria related to the neighborhood area type.</p>
<b>Page III-11</b>	<p>I find it interesting that the proposed distinctions protect a minimum amount of resource space against reduction, but also require a minimum amount of human density. I suppose resource space is a horizontal planning issue, protecting edges and boundaries, but human density has a vertical component that does not necessarily work against resource space, though it requires the consideration of buildings with more bulk and scale. I am not sure the Citizens want bulk and scale everywhere. On the whole I recommend a re-write.</p>	<p>This comment summarizes the issue well. In order to meet the City's estimated demand for future growth and protection of open space, vertical mixed use is a necessary component. The plan does not call for increased density and intensity everywhere, only in activity centers and along corridors. The problem is that the City has zoning that allows activity center intensity and density in large areas outside of our designated activity centers. While the city can't force a property owner to build below their current entitlements, we can incentivize context appropriate scale and not create unnecessary barriers to neighborhood compatibility for those property owners who may wish to rezone to a lower intensity and density in the right locations.</p>

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<b>Page III-8 Specific Plans</b>	There needs to be a sunset time for when a specific plan needs to be revisited. For example the McMillan Plan was about 15 years old and out of date by the time real development was possible. Times Changes things.	A good comment but outside the scope of this amendment. The place to make changes to procedures and content of specific plans is in Title 11 of the City Code. This is in the work program for the Comprehensive Planning staff within the next 2 years.
<b>Page III-8 Specific Plans</b>	New specific plans may 'clarify' but also must meet the goals and policies. That cannot be restated enough.	Language was removed
<b>Page III-8 Specific Plans</b>	Special Area Plans and studies should be given very high weight in conjunction with the regional plan for conformance unless Council specifically rejected them at the time of completion. This is because with staff or council changes something completely worthy of all the protocol and input can slip by without formal approval. Their value, if done correctly, reflects the areas desire no less.	Language was changed to reflect that even though they cannot be used for findings of conformance that they reflect the community desires unless specifically rejected.
<b>Page III-8 Specific Plans</b>	...the proposed new Special Area Studies section...creates more rather than less confusion. This language gives the example of the 2005 Southside Plan to indicate that, on the one hand such a plan exists, while on the other hand it wasn't adopted--on the one hand, much effort on the part of citizens and staff was spent creating it, on the other hand staff is free to disregard it despite the progress it <u>did</u> make through the system.... as it appears the city will not be undertaking a new Southside Plan in the foreseeable future, it seems especially pointed to dismiss what we do have, though imperfect	Staff rewrote the section to simplify and to recognize that the studies has value even if they cannot be used in conformance analysis. Appendix A was also reorganized to demonstrate which plans have been adopted in what ways.

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<b>Page III-8 Specific Plans</b>	Explain what a specific plan is up front and explain the differences more clearly and simply.	Staff reorganized this section of the chapter and made it brief based on other comments but incorporated Title 11 by reference. Title 11 is the appropriate place to outline the purpose, content and procedures for Specific Plans.
<b>Page III-8 Specific Plans</b>	The language is unclear because there is more to the story than, "The Flagstaff Regional Plan cannot supersede specific plans adopted by ordinance." For example, my understanding is that only portions of the ordinance-adopted specific plan (goals and policies) cannot be superseded. But there are other portions of specific plans which are advisory only. This needs to be made explicitly clear! This chapter must be able to stand on it own two feet; where required it needs specificity not just simplicity.	Good point. We'll clarify that each specific plan provides guidance on how to interpret it. There are everything from standards to aspirational statements in these documents.
<b>Page III-8 Specific Plans</b>	The new language doesn't so much make it more clear as cover itself regarding the Southside 2005 Plan. The current language in the FRP assigns value to that plan, which it should since it was an important citizen effort. This new language takes a roundabout path toward discrediting the report entirely for not having been adopted. As I understand, since the Southside Plan would be the next specific plan to be re-written, why not leave it as is? The SSP may be outdated but outlines the shared vision for the area quite accurately. Now, with inappropriate development pressing on the area, would be a very poor time to change this language.	The 2005 Southside Plan was not adopted as a specific plan. Regardless of what the current plan says, State law does not allow for it to be considered equally to the Regional Plan or an adopted specific plan because it cannot be used in a finding of conformance. That does not discredit the document as a valuable resource that captures the values and aspirations of the community at the time. Updating the plan and seeing it brought forward for adoption is an important future project for the Comprehensive Planning program. There have now been two development cases where the current language lead to misleading expectations and it is therefore important to replace the oversimplified language. Because the status of a plan can change over time, staff has removed the specific examples from the Chapter 3 text and included them in Appendix A.

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<b>Page III-8 Specific Plans</b>	the explanation of plans adopted by ordinance, by resolution, or commissioned but not officially adopted, or amended but only by the City, is generally confusing. I understand the distinctions because I have the deep background. But do these paragraphs need to be said at all? The language is not clarifying	Specific Plans are an essential tool in plan implementations. They do need to be described accurately in this chapter. Staff will refine the section to make it simpler and easier to understand.
<b>Overall direction</b>	It is clear from the development of the HUB that the regional plan and city zoning codes aren't working. We should quit hiring California people to tell us how we want our City to be. Flagstaff looks more and more like CA all the time, due to this misguided approach. If we are going to let the HUB proceed, we should just scrap the entire planning process, cuz it ain't working.	Not relevant to the proposal
<b>Page III-10</b>	The process for major and minor plan amendments needs to be defined. For example, major plan amendments require 15 public comment periods, over a 3 year time period, etc. I am being facetious but I hope you see my point - need to understand the procedural differences between the two type of amendments.	The process is defined in detail in Title 11 of the City Code. We will add a call out box that provides some basic information but defers to the City Code for details.

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<b>Page III-10</b>	At this point, my confidence that the Plan will be interpreted and applied as the Regional Plan Citizen Advisory Committee (CAC) and voters intended is low. As such, the proposed text about ALL types of amendments not listed as major are minor does not sit well. I think absolutes like ALL can be problematic. I fear design arounds to a proposal that would have triggered a major plan amendment, but with a slight tweak, now "downgrades" it to a minor amendment with less public input. My interpretation may be way off, but that is part of my point, the process needs to be explicit and clear so there is no opportunity for misinterpretation.	We made some additions to this paragraph to clarify. There is no legal way to make administrative changes to the Regional Plan. So the statement that any amendment that is not major is minor is actually an accurate description of the current condition. Once the City establishes categories for major plan amendments they cannot make ad hoc decisions that upgrade minor amendments to major. To add a new category, the plan must be amended. The current table listed some types of minor plan amendments but not all and as a result was confusing for applicants. If someone proposed a project that needed to amend the plan but was not listed in the current table, the City would still require a minor amendment.
<b>Page III-10 and 12 Future v. existing area types</b>	The section, "Minor Amendments to Other Maps and Plan Content," is very concerning. It reads that changes to land use would be decided equally on what is written in the document as proposed future development and what is existing and possibly embraced by citizens as their preference. First this sets us up for conflicts. What is in the doc as possible futures are only that: possible. The possible development described in the doc may be widely out of favor with public desires even when written and/or out of scale by the time it could be built and so if in the doc it could be pushed on the community.	The future area types in the Regional Plan are not merely possible outcomes of the future condition. The entire plan was calibrated based on the community charrettes to a community model that integrated, the built and natural environment to optimize a future Flagstaff with 150,000 residents and 75,000 jobs (see Page II-11). If the development that occurs is far under the intensity and density described by activity centers and future area types, there may not be affordable housing, enough good paying jobs, room for business to grow, larger environmental impacts, increased congestion, and a less efficient use of water and sewer infrastructure. The transition between the existing condition and the future condition is an essential ongoing community conversation, but to universally favor the existing to the future conditions undermines the foundation of the Regional Plan and would result in a less sustainable future for our community.

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<b>Page III-11</b>	Thank you for the opportunity to respond to the proposed Regional Plan Amendments. I was a member of the Regional Plan Advisory Committee. I have a few constructive comments. First, there is nothing that is transparent in the proposed substitution of one Table for another. This may be partially due to the nature of our Plan which is more about Placemaking, relies less upon traditional mapping, and emphasizes creating intensity and density centers. Still, and for example, it is hard to comment upon the proposals without actually attaching Maps 21, 22 & 24.	This comment was received on the community forum. Staff added links to the maps within a few days. One of the ways the city staff improved the chapter between the current and proposed version is adding explanatory information about the interpretations commonly used for maps 21 and 22 so that we can be consistent in our reviews and transparent with the public. A better introduction to this section and clearer heading were provided as a result of this comment
<b>Page III-11</b>	#6 Many activity centers designated on the map were placed ‘just because’ but with no description of density. Therefore the phrase should include both ‘reduce and increase’ density.	There is a description of density that is general to all activity centers and specific plans can refine or redefine those ranges. The densities have no maximum right now (for example 6 du/acre+) and so it would be impossible to develop a case in an activity center that is requesting an increase in density and intensity outside the range of what the plan calls for. Because of this, the maximum building heights in the zoning code are the only controls for maximum density and intensity.
<b>Page III-11</b>	Any part that talks about Activity Centers is problematic at this point because the CAC designations on the map had no discussion as to density or anything other than at some point there may be an intersection and development or something already exists. Activity center is an incompletely defined concept and yet it is used that defines a major or minor amendment.	Further refinement of language related to activity centers will be considered as part of the next plan amendment in the program schedule. This amendment is meant to update Chapter IX: Growth and Land Use. Updating how activity centers are refined and defined could have major impacts on the outcomes of the plan.
<b>Page III-11 &amp; 12</b>	#3 The relevant example on page III-12 is not clear.	Clarified
<b>Page III-12</b>	the minor amendment examples need clarifying. For example adding or deleting a policy could change the intent of the corresponding goal.	Added policies into the major plan amendment category

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Page III-12	The whole thing with urban and suburban seems tangled up with major amendment definition.	Broke it into 2 examples to try and clarify
Page III-12	In general I am uneasy with Page III-12 because in reading it I don't form a clear picture of the checks and balances.	Added explanatory sentences to page III-12. Staff may consider enhanced participation for minor plan amendments, such as a public review period, when the next round of Title 11 updates are considered.
Page III-12	Growth Boundary changes are mentioned as a criteria both in the major amendment wording and minor amendment example. Can it happen in both?	Added a clarifying example
Page III-13	Make the language about future and existing area types clearer that they reference maps 21 and 22 and that they are tied to descriptions in the tables of characteristics in Chapter 9	Added clarifying language
Page III-2	Diagram, Was Vision 2020 finished in 1996?	Started in January 1996 and completed in June 1997
Page III-4	History: The Guide 2000 was the first general plan that talked about goals, open space, FUTS and alternate transportation in a way that reflected city wide input. It is a great reference if one wants to understand our city development from about 1988 to 2005. It is really the basis for Vision 2020 and the 2001 regional plan.	Modified description of the Growth Management Guide 2000 on page III-4 in the call out box to emphasize its foundational purpose.
Page III-5	Use of the broad term 'property rights' bothers me because it can be over interpreted. How about just zone changes?	Removed language and replaced with development applications and city-led projects to identify the scope of the decisions relevant to the plan.
Page III-5	Don't delete 'development approvals' because that is the final step that reflects the goals of the regional plan. The term is used on page III-6.	Put it back in with clarifying language

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<b>Page III-5</b>	The added phrase ‘intended to be’ I don’t think reflects the understanding of the CAC. It should be deleted because it assumes something I don’t believe is the total thought.	Done.
<b>Page III-5</b>	It is also unclear to me why the words “development approvals” are deleted given the role council plays in approving rezoning requests as well as CUP appeals and other appeals that may come before it.	Not all development approvals are discretionary or presented to the City Council. Some are completed administratively. In addition, not all decisions before Council give equal weight to the Regional Plan. For instance, CUPs do not need a finding of conformance with the Regional Plan.
<b>Page III-5</b>	I am concerned about the meaning of the changes to the role of city council on page III-5. The box on the right indicates that some language was struck, but only three words “inform a final” were shown as struck and those words are out of context.	This sentence has been rephrased to clarify the meaning and intent.
<b>Page III-6</b>	Don’t delete ‘or applications’. This is one of the points some public are using in discussing the HUB project. It encourages public input which also helps in implementing the Regional Plan reflective of its community goals.	The change in wording does not change the meaning, given the list of examples that follows and remains unchanged. Poor wording led to confusion over the legal extent to which the plan can be applied in development decisions.
<b>Page III-8 Specific Plans</b>	The present moment, when there is so much disagreement about whether the Regional Plan is being appropriately applied to large development projects, is exactly the wrong time to try to fine tune the language.	The language in the plan that is largely the source of current disagreement related to Chapters 8, 10 and 13 of the Regional Plan. Any policy analysis, whether for a major or minor plan amendment, would address the trade-offs between these policies. The Region Plan was meant to provide more flexibility than the 2001 Plan. It was also meant to be revised and updated regularly to reflect current issues and concerns. None of the changes proposed would have influenced how the Regional Plan was interpreted in recent development cases.

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<b>Page III-9</b>	When is the Annual Review due if you delete the phrase? Will the public be purposefully notified of its completion and availability?	The annual review is due on a date that is now left to the discretion of the City Manager. Right now the report is compiled after the budget process is completed for the next fiscal year but before the work program has begun. This is in part due to the timing of data availability. If data availability and reporting can be streamlined in the future, then the report may be prepared and sent to Council earlier in the process.
<b>Prop 207</b>	It terms of the new language, it is important to note that in a Prop 207 world, “changes in property rights” are a one way decision. Council can increase property rights, but its ability to decrease them is quite restricted.	This sentence was changed to remove this language based on other comments. All potential Prop 207 issues are discussed with the City’s legal department.
<b>Staff priorities</b>	Leave the update of Chapter 3 alone in favor of more pressing matters in the community, like the Southside Plan	Staff began working on the update to Chapter 3 in November 2015, based on direction from Council to proceed with a strategic plan for updating the Regional Plan identified in the Annual Report. The City Council did not provide direction on which specific plan staff should pursue next until January 26, 2016. Completing a Specific Plan take about 5-10 times more work than a minor amendment, therefore they are not interchangeable projects.
<b>Timing and Process</b>	The CAC worked on the plan for 5 years, the revision process is not equal to the effort made to create the original.	Records and interviews with former CAC members show that Chapter 3 was not reviewed or discussed with the CAC prior to public hearings. The review period for this plan amendment is intended to provide a second chance for those involved in developing the Plan to comment and revise this section.
<b>Timing and Process</b>	The current draft of the regional plan was developed by a committee of citizens who met over a number of years. It was then extensively revised by city council and passed by the voters.	Records and interviews with former CAC members show that Chapter 3 was not reviewed or discussed with the CAC prior to public hearings. The review period for this plan amendment is intended to provide a second chance for those involved in developing the Plan to comment and revise this section.

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<b>Timing and Process</b>	<p>The citizen's committee spent 5 years bringing this update forward. To relegate any revisions to a (very) short term window, and an online process, is quite the slap in the face for all who volunteered so many hours to such a lengthy process.</p> <p>I ask you to extend the process a minimum of 30 days, and perhaps consider alternative avenues for additional input.</p>	<p>The process for the proposal included in-person meetings with several members of the Citizen’s Advisory Committee prior to creating a proposal. During those interviews, all but one member had no memory of reviewing Chapter 3 in advance of public hearings and noted that there was very little comment or public input on this topic at the time. Meeting notes also lack evidence of collaborative input on this chapter of the Plan. Staff, therefore, proceeded with providing a more focused second chance for the public to review the Chapter. Prior to releasing a proposal, staff held a work session with the Planning and Zoning commission that was open to the public on January 26<sup>th</sup>. Staff created opportunities for public involvement during the 30 day comment period both online and in person. In person opportunities included an open house on April 7<sup>th</sup> and another Planning and Zoning Commission work session on April 13. In addition, the Comprehensive Planning Manager was available for one-on-one meetings, of which there were 2 during this time period. There will be another chance for involvement at a Citizen's Review Session, which is a meeting of the Planning and Zoning Commission tentatively scheduled on May 11th.</p>
<b>Timing and Process</b>	<p>Agree...please extend both the process and outreach. I see members of the community struggling to understand the ramifications of the replacement text throughout this Chapter. As we are finding, the words matter.</p>	<p>The process for a minor plan amendment was enhanced in the case of this amendment. No comment period is required by Title 11 and staff scheduled time to meet one on one with interested individuals and organizations before developing a proposal for review. There will be further opportunities for citizen’s to comment on the proposal during the public hearing process.</p>