

**COMMENTS BEFORE ALHAMBRA VILLAGE PLANNING COMMITTEE
ON CITY OF PHOENIX TEXT AMENDMENTS PERTAINING TO
REDUCTIONS IN PARKING, ACCESSORY DWELLING UNITS, AND
MOBILE HOME PARKS**

Please include these comments as provided in the minutes for the AVPC.

(1) Process for Formulating, Reviewing, and Approving the proposed
Text Amendments

The process for public involvement to comment on these proposed text amendments is unacceptable. There was an effort to include stakeholders in at least one of the amendments (for mobile homes – unknown for the others), but neighbors, neighborhood associations, mobile home residents and related organizations, and affordable housing advocates were not considered to be stakeholders - only those groups who would stand to benefit financially from any changes were included. As far as I can tell, none of these text amendments included any resident input whatsoever in their formulation – despite the fact that residents are the ones who would be most impacted by them.

There has been very little publicity about any of these proposed changes in order to garner public input – nothing on the City of Phoenix website, in the water bill, in Councilmembers' or Mayor's newsletters, nothing in the newspaper or any other publication. The only residents who will even know this is happening are those who monitor VPC agendas (you can probably count all of them on one hand) and those who somehow stumbled into this information because they knew someone who knew someone (which is how I found out). The VPC agendas don't provide any information about the proposed amendments or even much of a description. There are no links or details - so the only way to learn about the amendments is to attend the meeting and wait through a lot of the agenda, and then to attend another meeting when the VPC votes on it.

This "opportunity" for the public to comment may be called public review or public involvement, but it is neither. It is an obligatory gesture towards the persons who would be most impacted by these provisions, not a

meaningful conduit to achieve understanding and obtain thoughtful public comments.

(2) Accessory Dwelling Units:

I believe the intention of this text amendment is to increase the supply of attainable if not affordable housing in single family residential zones. It attempts to achieve this by allowing by right additional construction in single family zones for structures that have a separate entrance, are one-story and fit within the setbacks of the current zoning.

There are many reasons for a homeowner to want an accessory dwelling unit on their property as allowed by this proposed text amendment and the vast majority have nothing to do with creating affordable or attainable housing that would be rented to a stranger. From what I can tell in the text amendment, an accessory dwelling unit could be used as a home office; as a guest house for visitors, for one's family members (parents, in-laws, teens, siblings, grandparents, etc.), etc.; as a short-term rental; for storage; a gardening center; an art studio; an exercise studio; for parties; among others.

It takes a special type of person to be willing to let a stranger live long-term practically on top of them and to be their landlord. I hypothesize that most homeowners aren't that type of person, either because they value their privacy or because they don't want to be a landlord.

However, investors are those types of people. They want to be landlords, they aren't concerned about privacy lost, security issues, noise, traffic, a proliferation of cars on the street, etc. For them it is a business model in which they are remote from the impacts of their revenue generator. Allowing accessory dwelling units by right will be a shot in the arm for investors who would be allowed to knock down a house and build two houses on the same lot, one a little smaller, and rent them both. Essentially the result would be duplexes that aren't necessarily physically connected. If not duplexes, then flag lots.

Accessory dwelling units also would be appealing to investors who would buy up homes, build an accessory dwelling unit and use both as short-term

rentals. It sounds ideal as a party house set up – great for investors and problematic for neighbors.

This Amendment also (as far as I can tell) doesn't address the potential impact on historic districts. Would a historic home with a modern accessory dwelling unit lose its historic status? Would there be provisions to protect against that?

Finally, ADUs are not a direct solution for the current housing shortage. There is no guarantee that an ADU would be used as long-term housing; if it is, there is no guarantee that it would be affordably priced. Many studio and one-bedroom apartments are expensive—size alone is not an indicator of rent that would be charged.

At a minimum, (1) short term rentals should be regulated so they don't cause problems for the neighbors and this text amendment should not be passed without those regulations in place; (2) historic neighborhoods should be protected from degradation from ADUs; (3) there should be some provisions to deter investors from buying up homes and converting them to rentals (which drives up the cost of all housing); (4) the proposed text amendment needs to be evaluated in terms of its likely impact on the housing supply. If it won't make a meaningful contribution to the housing supply, then it should be reconsidered in that light.

(3) Reduction in Required Parking:

The proposed reduction in affordable and multi-family parking (1.25 parking spaces per unit) would mean fewer parking places per unit are provided than is currently required for any apartment units of any size, including studios (which are 1.3 parking spaces/unit). It is unclear why this is being considered. Is it because existing parking lots and garages for apartments are largely empty? Are there statistics showing that the number of vehicles per apartment unit is declining and that is the justification? It would be useful to see and analyze these statistics.

This proposed reduction would apply to luxury apartments as well as more affordable apartments-- everywhere, not simply near light rail. Does this mean that affluent people have gotten rid of their vehicles to ride buses and

bicycles and walk to their destinations? Given the increasing amount of traffic in Phoenix, I would be surprised if that were the case.

The 1.25 parking spaces/unit is a maximum number of parking spaces under the proposed text amendments. In affordable housing located anywhere, for all multi-family units in infill areas and near light rail, those numbers decline by a minimum of 40% and a maximum of 100% for affordable housing in areas subject to the Walkable Urban Code.

These reductions in parking spaces either assume that everyone is taking alternative transit and walking or that there is sufficient street parking for the vehicles for which there is reduced or no on-site parking provided. These vehicles would be parking on the same residential streets that now also have extra vehicles on them from ADUs, for which no additional parking spaces have been required.

Essentially, this would create the same reality faced by people in major midwestern and eastern metropolises where parking spaces are in short supply. In those cities, finding a parking space is a daily grind, and people have to walk blocks from their vehicle to their home, carrying groceries, pets, children, packages, etc. Key differences between Phoenix and those cities are: (1) Phoenix is a city largely without sidewalks, so there would be more pedestrians walking in residential streets that are narrowed from cars parked on both sides of the street, while facing increased traffic from drivers looking for someplace to park; and (2) Phoenix typically has almost 100 days of triple digit temperatures. Unlike most midwestern and eastern cities, Phoenix does not have mass transit that makes it easy to get around the city and doesn't have the weather, traffic, or infrastructure that makes it safe to bicycle or even walk year around. If I didn't have a car to drive to this meeting from my house at about 3rd Street and Bethany Home Road, it would have taken me 52 minutes – including 24 minutes of walking and 28 minutes on the bus—assuming that the buses were on time. Driving, it took 10 minutes and I daresay I arrived smelling fresher.

Reducing parking for affordable housing to zero ignores the many persons in affordable housing who have disabilities and cannot walk very far. Parking blocks from their apartment is not an option for those with

health or mobility problems, nor is walking several blocks to get on a bus or rapid transit. They need onsite parking.

This proposed reduction of parking spaces would only work if coupled with a plan to help people to travel in Phoenix without cars. This text amendment alone does not achieve this. Otherwise, it appears the only ones who would benefit from this text amendment would be apartment developers and their shareholders who could increase the number their apartment units without having to pay for adequate parking. There is no provision to require them to pass their cost savings on to their tenants in reduced rents or to compensate the neighbors for the traffic and safety problems and inconvenience created by the additional vehicles parked on the street.

Additionally, this text amendment does not address providing charging stations for electric vehicles in multifamily housing. Surely this would be the time and place to address this.

(4) Mobile Homes: I am not clear whether the AVPC is addressing the mobile home text amendments as they aren't on this agenda. I would hope that there would be a presentation on this as the text amendments are complex. Or did I miss the presentation?

Thank you for this opportunity to share our neighborhood association's concerns.

Jackie Rich
President, Murphy Trail Estates Neighborhood Association
June 27, 2023

FROM : Robert Maynard

SUBJECT : Parking space

MESSAGE : I just read where the city council will vote to reduce parking spaces for apartments in various parts of the city. I am very much against this. Parking is an issue around this city all the time. Look around any school and the residential neighborhoods where the neighborhood, is inundated with students, and parents cars. Try finding a parking spot in uptown plaza on the weekends and holidays. Overall it is a very bad idea. It would have been a good idea if done in the 60s or early 70s but not now.

Thank you for your public service on the council,
Robert Maynard
524 W. Why Worry Lane
Phoenix, 85021

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Submission ID: 53d14aade3b24416acf98b1c660f80cb

Form Submission On : 7/18/2023 12:24:07 PM

Referer: <https://phoenix.gov/district3/contact-district-3>
This is Not Spam - This message is sent on behalf of the City of Phoenix.
Please handle appropriately.



1 August 2023

Chair and Commissioners
Planning Commission
c/o City of Phoenix, Planning and Development Department
200 W. Washington Street, 2nd Floor
Phoenix, Arizona 85003

RE: TA-5-23 (ADUs); TA-8-23 (Affordable and Multi-Family Housing parking reductions)

Mr. Chairman and Commissioners:

Attached with this letter is a correspondence the Neighborhood Coalition (NCGP) sent to all Village Planning Committees (VPCs) in July regarding the subject text amendments.

NCGP representatives presented on the subject at ten of the 15 VPCs.

Planning and Development submitted to you an addendum to the ADU text amendment. While we appreciate the effort to improve the TA, the changes have yet to be aired so we wish for a more fulsome public discussion before embracing the changes suggested.

We continue to stand by our recommendations—amending the ADU TA to improve the clarity of its impact on historic preservation districts, special planning districts and overlays, and HOAs and CC&Rs. We also think managing short term rentals (STRs) deserves a greater inspection.

We also believe that the proposed parking reductions to affordable and multifamily housing projects warrant substantial amendments to be considered viable on a citywide basis. Indeed, nine of the 15 VPCs voted to deny the reduced parking text amendment as presented to you.

Please consider the recommendations NCGP has offered you for both TAs.

Respectfully,

Neighborhood Coalition of Greater Phoenix members and friends

att.



11 July 2023

Chair and Committee Members
Desert View Village Planning Committee
c/o City of Phoenix, Planning and Development Department
200 W. Washington Street, 2nd Floor
Phoenix, Arizona 85003

RE: TA-5-23 (ADUs); TA-8-23 (Affordable and Multi-Family Housing parking reductions)

Chair and Committee members:

The Neighborhood Coalition of Greater Phoenix is registered with the Corporation Commission of the State of Arizona and has continuously been a member in good standing since 1984. Our members are from neighborhoods across the City of Phoenix.

Background

We understand that our nation is facing a housing shortage and that Arizona and Phoenix have not been spared from this shortage. NCGP members believe it falls upon all of us to help provide relief and a sustainable path forward.

In that spirit, members of the NCGP working group gathered to review and discuss the proposed subject text amendments the City has anticipated to address our housing shortage.

2023 Arizona Legislative Session

This year's session saw several housing bills make their way through the Legislature without success. Indeed, NCGP, its members and our partners across the Valley and the state were active in seeking 'no' votes from elected representatives. Ultimately, the bills were either voted down decisively, on a bipartisan basis, or they failed to make their way to the floor of either Chamber.¹

¹ Senate bill SB1117 was denied in the Senate on a bipartisan vote, failing 20 to 9 in March. The bill was then broken into 3 separate bills: HB1161, HB1163 and SB2536. On the final day of voting in June, SB2536 was defeated on a bipartisan basis, 19-10. HB1161 and HB1163 failed to get a vote on the House floor, ending the bill sponsor's push for so-called 'zoning reform.'

We provide this information to let VPC members know that all the text amendments coming through committees in the last several months--and now this month—can claim origins from the bills at the state legislature that we are intimately familiar with.

Z-TA-5-23 (Accessory Dwelling Units or ADUs)

Many of us think that ADUs can have a positive impact on the housing supply in our city. Yet, we believe that there are several elements of the proposed TA that require additional scrutiny. These are our comments and suggestions.

I. Historic Preservation and other Special Planning/Overlay Districts:

We have great concern that the TA as presented will create confusion and contention between this ordinance and the ordinances that govern properties of historic significance. Z-TA-5-23-Y must state that for historic properties, Chapter 8 of the Zoning Ordinance takes precedence over the design review standards for ADUs. Specifically, the proposed language states:

"(c) DWELLING UNITS ON LOTS ZONED OR DESIGNATED HP ARE EXEMPT FROM THE PROVISIONS OF SECTION 8.5, SO LONG AS THE PLANS ARE REVIEWED AND APPROVED THROUGH HISTORIC PRESERVATION PRIOR TO ISSUANCE OF ANY BUILDING PERMITS."

The phrase "so long as..." is imprecise and doesn't make it clear that ADUs in historic districts MUST be reviewed by the HP Office. The proposed language is subject to misinterpretation that a project may EITHER be approved by the HP Office OR incorporate the Design Guidelines of Section 8.5 of the TA.

To make it clear that ADUs in historic districts must have HP approval, we suggest the following language:

"Dwelling units within a historic district and/or with HP or HP-L zoning overlay are subject to review by the City of Phoenix Historic Preservation Office pursuant to Article 8 of the Zoning Ordinance. In the event the provisions of Section 8.5 herein, or other ordinance or regulations are inconsistent with Article 8 of the Zoning Ordinance (Historic Preservation), Article 8 shall have precedence."

We also believe the proposed TA Section 702.F.1(b) (Special Parking Standards), likewise does not make it clear that HP approval is REQUIRED for the addition of parking to the front of a historic property (widening of driveways and curb cuts, etc.), and the language should be strengthened. The proposed language states:

"Spaces in excess of those required for single family and duplex residential uses may be located in the required front yard. However, all parking and maneuvering areas within the required front yard shall not exceed forty-five percent (45%) 50% OF THE AREA OF THE REQUIRED FRONT YARD, EXCEPT THAT A DRIVEWAY SHALL NOT BE REQUIRED TO BE LESS THAN 18' IN WIDTH UNLESS OTHERWISE STIPULATED BY HISTORIC PRESERVATION."

We think stronger language is needed to ensure that Historic Preservation regulation takes precedence over the ADU ordinance by deleting, "Unless otherwise stipulated by Historic Preservation", and adding the following sentence:

"Any and all changes to driveways, parking and maneuvering areas within a historic district and/or with HP or HP-L zoning overlay are subject to review by the City of Phoenix Historic Preservation Office pursuant to Article 8 of the Zoning Ordinance. In the event the provisions of Section 702.F.1 herein, or other ordinance or regulations are inconsistent with Article 8 of the Zoning Ordinance (Historic Preservation), Article 8 shall have precedence."

Third, the proposed amendment Section 706.A.3.b (Accessory Dwelling Units (ADU)) is also worded in such a way that makes HP approval seem optional.

The proposed language states:

"b. A DETACHED ADU, WHEN VISIBLE FROM ADJACENT STREETS, SHALL BE CONSTRUCTED WITH SIMILAR AND/OR COMPLEMENTARY MATERIALS, DESIGN, AND COLOR(S) AS THE PRIMARY DWELLING UNIT, OR AS MAY BE APPROVED BY HISTORIC PRESERVATION FOR HP ZONED OR DESIGNATED PROPERTIES. (P)"

Instead of using the imprecise phrase, "or as may be approved", the language should be strengthened as follows to make it clear HP approval is REQUIRED for historic properties:

Delete the phrase "or as may be approved by Historic Preservation..." and add the following sentence:

"A detached ADU within a historic district and/or with HP or HP-L zoning overlay is subject to review by the City of Phoenix Historic Preservation Office pursuant to Article 8 of the Zoning Ordinance. In the event the provisions of Chapter 7, Section 706.A.3.b herein, or other ordinance or regulations are inconsistent with Article 8 of the Zoning Ordinance (Historic Preservation), Article 8 shall take precedence."

II. Parking for ADUs

We agree that the amount of the front yard that can be allowed for parking needs to increase from 45% to 50% for parcels that are approved for an Additional Dwelling Unit. We also know, based on experience, that on-street parking will become more frequent.

To ensure that property owners in proximity to a property with an ADU is not inconvenienced or that use of their property is not diminished, on-street parking should be regulated. Please note that homes subject to Historic Preservation, Special Zoning and Overlay Districts are still subject to whatever specific regulation(s) applies to those properties per the first consideration in this position statement.

Combining on-site and on-street parking concerns, the regulation should read:

“A minimum of 1 parking space shall be available either on-site with adherence to Section 720.F.1 as amended to 50% of the front yard, or on-street parking that must only be in front of the subject property unless the property is a corner lot and side-street parking is possible.”

Consideration should also be given to adding language to ensure visibility triangles are maintained.

III. Short Term Rental

We appreciate the addition of the paragraph in the revised TA requiring a Restrictive Covenant but do not feel it is strong enough to meet the City’s goal of increasing affordable housing supply for permanent residents. As currently worded, the Restrictive Covenant will preclude investors who own residential property from applying for an ADU, but it does not prevent an owner-occupied property from renting an ADU on a short-term basis. The consequence will have a negative impact on affordable housing for first time renters (e.g., college-aged adults), and temporary workers (e.g., traveling nurses), among others.

The Restrictive Covenant paragraph should be revised to add the regulation that ADUs, if rented, must be for a term of no less than thirty (30) days. The current City of Flagstaff ordinance states:

(a)The property owner, which includes title holders and contract purchasers, shall occupy either the primary dwelling unit or the ADU as their principal residence, unless the primary dwelling unit and ADU are allowed to be separately leased or rented in accordance with subsection G of this Section.

(b)The primary dwelling unit or the ADU that is not occupied by the property owner that is rented or leased shall be for a period of no less than 30 days.

IV. Homeowners’ Associations/ CCRs

The proposed TA does not address coordination with Homeowners’ Associations or Covenants, Conditions and Restrictions. By law, these contracts must be honored in addition to municipal codes and ordinances. This TA should state that applicants for ADUs must comply with HOA and Covenants, Conditions and Restrictions in addition to the provisions of the ordinance.

Z- TA-8-23 (Affordable and Multi-Family Housing parking reductions)

We understand the desire to relieve what developers perceive as parking ‘constraints.’ We generally believe, however, that a ‘one size fits all’ approach to parking reductions does not reflect a thoughtful approach for a city of 517 square miles.

Any reduction in the current parking space calculations for multi-family housing, in any district and any price category, will put the burden of parking on public streets throughout the city. Therefore, any revisions to the current ordinance need careful consideration.

We believe this TA is being rushed through the approval process without such diligence. With the goal of working together to find suitable solutions, we make observations and propose revisions to the current ordinance as follows:

I. Parking space calculations for multi-family developments should only be based on proximity to currently available transportation options. They should never be based on the rental rates of the units (i.e., luxury, affordable, market rate, low-income/subsidized). It is discriminatory to believe that people who live in lower-priced housing do not have or do not want personal vehicles.

II. Because of the cost of apartment rentals, more units of every size are being shared by two or more people, oftentimes housemates rather than couples. Expecting that no occupant will have a car, even in TODs and WU code areas, is not based on empirical data.

III. Reducing the on-site parking requirements for multi-family housing might be appropriate for residents living in the Downtown Core, Transit Oriented and WU Code districts, yet it is not acceptable to residents living outside of those districts.

Phoenix is the second largest city by area in the United States. Because of the lack of convenient, reliable public transportation in every Phoenix Village outside of downtown and within walking distance of light rail, residents depend on personal vehicles to go to work, to the grocery, and to the entertainment venues clustered in downtown.

Those residents who do not live downtown will also need parking to continue enjoying all that downtown has to offer. If all the street parking is taken by downtown residents, commuting patrons will be deterred from attending events.

IV. Include a requirement that visibility triangles must be maintained.

A. Reducing on-site parking to encourage more density with potentially small front and side setbacks could lead to encroachment on the visibility triangle that is a necessity to ensure safety.

V. City-wide Multi-family Parking Requirement

A. The base parking space requirement should be 1.5 spaces per dwelling unit.

- i. This simplifies the calculation instead of calculation based on size of DU
- ii. Maintains the current requirement as the most frequently built size of unit (1-2 bdrm)
- iii. Averages the current requirements (1.25/efficiency; 1.5/1-2 bdrm; 2/3 bdrm)

iv. It should not be less than the current efficiency DU requirement

VI. Citywide Affordable housing Parking Reduction

- A. Delete this provision because it does not consider proximity to alternative to personal vehicle modes of transportation.

VII. Infill Development District Parking Reduction

- A. Delete the calculations entirely
- B. Use 10% bonus density incentive

VII. Walkable Urban (WU) Code affordable housing parking requirements

- A. Required parking should never be “zero”
- B. Parking for handicapped residents should always be required and maintained
- C. It should not be expected that residents living in affordable housing in the areas of the WU Code will not have personal vehicles
- D. It should not be expected that residents living in affordable housing in the areas of the WU Code will never have a guest with a personal vehicle

IX. Passenger Loading Zones within WU Code

- A. Also require parking of service vehicles (e.g., repair technicians) that require more time than the other stated examples
- B. Also require parking for renter move-in/move-out vehicles that require more time than the other stated examples

Process: Lack of neighborhood outreach

In a June 1, 2023, staff report to the City of Phoenix Planning Commission, PDD staff wrote:

Staff obtained input from various stakeholders and held four meetings to review and request additional input on the proposed text amendment. Stakeholders included individuals from the following organizations:

- *Manufactured Housing Communities of Arizona (MHCA)*
- *Manufactured Housing Industry of Arizona (MHIA)*
- *Arizona Department of Housing Board of Manufactured Housing Member*
- *Affordable Housing/Private Developers*
- *Arizona State University, Real Estate Development*

While we understand that staff feels the need to reach out to industry representatives to understand their position, so, too does staff need to reach out to citizens and neighborhoods to understand the issues of the vast swaths of residents who will be impacted by these proposed sweeping changes to our housing stock.

Does the City of Phoenix think that simply vetting these proposals—changes that can have a vast impact on the existing population—should only be presented to VPCs?

Clearly, some VPCs took issue with the speed and confusion of the proposals of the initial two text amendments when they were presented. It appears six of 15 VPCs did not meet quorum on the first go-around; yet another VPC did not meet quorum last night.

We ask: How can vast changes to the entire city be vetted by, perhaps, 150 people or less?

Next steps: Approve our recommended amendments

We have pored over these proposals to identify the gaps and looked ahead to stave off unintended consequences. We've shared those with you here. Simply approving what's been presented in your packet would be to ignore the serious concerns we've presented without rectifying those issues.

The Neighborhood Coalition looks to make these TAs the strongest and most applicable they can be. We would be disappointed if members simply approved the proposals "as is" because we don't want to see this opportunity squandered for the sake of speed, with all of us missing out on something that can truly help our city now and in the future.

Respectfully,

Neighborhood Coalition of Greater Phoenix (NCGP)

Neal Haddad, President, NCGP; Arcadia Osborn Neighborhood Association

B. Paul Barnes, Vice President, NCGP; AZ APA Distinguished Citizen Planner; former CEVPC chair

Mary Crozier, President, North Central Phoenix Homeowners Association

Sandy Grunow, Co-Chair, Mid-Century Modern Neighborhood Association

Dave Jackson, President, Rancho Ventura Neighborhood Association

Jack Leonard, architect, AIA, NCARB, LEED AP; 2015 General Plan update committee;

former Camelback East and Encanto Village Planning Committees

Michael Phillips, President, Arcadia Camelback Neighborhood Association

Jackie Rich, President, Murphy Trail Estates Neighborhood Association

Larry Whitesell, Co-Chair, The Peak Neighborhood Association

Racelle Escolar

From: jvrich@gmail.com
Sent: Tuesday, August 1, 2023 5:46 PM
To: PDD Planning Commission
Subject: Comments on Agenda Items 16 and 7 (Z-TA-5-23-Y and Z-TA-8-23-Y)

Dear Planning Commissioners,

I am writing this email to urge you to take your time in considering the proposed complex text amendments pertaining to Accessory Dwelling Units and Reduced Parking Requirements. Do not rush into a decision before you are comfortable that what you are acting on will not come back and bite you and the city of Phoenix at a later date.

These two text amendments will have a big impact on Phoenix and Phoenicians. They sprung from the Planning Department, were sent to the Village Planning Committees for their recommendations (all of whom are Council appointees), now you, also Council appointees, are considering them, and then finally, the Council will act on them. The public's opportunity to provide input was neither publicized or solicited. No neighborhood stakeholders were included in their development. While there were articles in the AZ Republic about the Accessory Dwelling Unit amendment as early as July 3, the first article on the parking reduction text amendment was on July 19, when all but 3 VPCs had already met and made recommendations. It is also worth mentioning that the agendas for the VPCs did not identify Z-TA-8-23-Y as reducing required parking although they identified the other amendment as allowing ADUs. Instead the agenda listed all the sections that needed to be changed so that someone looking at it would have no idea what that text amendment was actually about.

The only members of the public who have participated in the VPC meetings are people who serve on a different VPC, work for an industry that would benefit from these amendments, or neighbors and neighborhood groups who accidentally found out about the amendments. I have been to five VPC meetings, each of which lasted for as long as 3.5 hours, just to be able to speak for 2 minutes max on each text amendment. (Note, some VPCs allowed more time for members of the public to speak - just not the ones I attended.) At the meetings I attended, I was not allowed to ask questions. Following public comments, staff often offered a rebuttal to what members of the public said, and after that the public was ignored - no opportunity for any of us to answer questions that came up or to respond to incorrect information. It was frustrating.

I have other concerns about the VPC meetings. The packets that were sent to the VPC members online were well in excess of 200 pages. Some packets weren't sent out until after 3:30 pm the day of the meeting; some VPC members never received a packet; other VPC members received packets but didn't read them (perhaps because of lack of time or because of the length). There was a questionable email conversation about the text amendments that all VPC members were part of and which was potentially in violation of the Open Meeting Law that was referred to at a VPC meeting by several VPC members. Several of the VPCs did not have a quorum in June and so learned about the text amendments for the first time in July when they were expected to vote on them.

Some of the Planning Commission members are essentially in the same position as those VPC members who had the least amount of time to learn about the text amendments. They are hearing staff's presentation about these complex text amendments on the same night they are expected to vote on them. Your consideration of the text amendments will be late in the night after considering 13 other cases. How many hundreds of pages were in your packet? The text amendments alone are a lot of information to digest in an evening.

These text amendments are too important and consequential to be rushed through and there is no compelling reason to do so. I urge you to take your time and give these text amendments the time and attention that they deserve.

Thank you,

Jackie Rich
Murphy Trail Estates Neighborhood Association

Racelle Escolar

From: jvrich@gmail.com
Sent: Tuesday, August 1, 2023 5:55 PM
To: PDD Planning Commission
Subject: Comments on Agenda item 17: Z-TA-8-23-Y

Dear Planning Commissioners,
I am writing with regards to Z-TA-8-23-Y concerning reductions in parking requirements for multifamily housing.

First of all, I find it surprising that in Z-TA-5-23-Y, which would allow Accessory Dwelling Units, one covered parking space per dwelling unit is required, while for multi-family housing according to this text amendment, it is acceptable to have .5 parking spaces per unit or even zero.

The proposed reductions in required parking spaces may work in some parts of town where light rail is nearby, where stores and services are nearby, and in seasons when the temperatures are moderate. However, it is difficult to imagine that residents living in parts of the city like Laveen, Desert View, Estrella Mountain, Ahwahtukee, in neighborhoods that are miles from light rail or convenient, reliable bus service will benefit from the proposed reduced parking requirements. Taking away required parking will not reduce vehicle ownership. It will mean that apartment residents must park in the streets and walk to and from their cars. On street parking is less convenient, less safe, less secure than parking in an apartment complex.

It is also difficult to imagine that living within a quarter mile of the light rail would allow people who live in affordable housing to go entirely without cars and justify zero required parking. A quarter mile is a long way to walk in extreme heat even for young people in good health. It would be more arduous for everyone else, particularly people who are disabled with mobility problems. There is a reason that ADA parking spaces are the ones that are closest to entrances to stores and offices - persons with mobility issues can't move very far - certainly not a quarter of a mile to get on light rail.

In addition, there are very few grocery and other retail stores, doctors' offices, and other services that are located along the light rail. Relying on Light Rail also can limit where one can work, as some jobs require the mobile flexibility that, at this time, only a car can provide.

It has been argued by affordable housing providers that people living in affordable housing don't have cars and their parking lots are half empty. That isn't true, which you can check out by looking at street view on Google maps. It has been argued that developers will provide more parking than the requirement if that is in the best interest of their prospective tenants. My experience as a neighbor engaged in land use decisions for more than 20 years, is 9 out of 10 developers will meet the minimum requirements and not go beyond them in order to maximize their profits. Only the rare developer cares about creating a quality development that benefits the tenants and the neighborhood.

Thanks to the recently adopted Prop 400 that will be going on the ballot in November, there is no funding allocated to expanding the light rail system. So in our best case scenario and Proposition 400 is passed, the light rail will not, in the foreseeable future, serve the communities on the edge of Phoenix. If this is all the light rail there will be, do the proposed reductions in parking requirements in this text amendment still make sense?

Thank you,

Jackie Rich
Murphy Trail Estates Neighborhood Association