

## ATTACHMENT F

**From:** [L Shannon Bryant](#)  
**To:** [PDD Middle Housing](#)  
**Subject:** Proposed Middle Housing  
**Date:** Tuesday, August 5, 2025 2:00:29 PM

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I live in the Hacienda Historic District and if this passes will now be forced to MOVE. I will not live next to a 4-Plex with 4-5 cars parked in front. That is NOT why I selected my adorable quaint historic neighborhood with long term great neighbors. If your Plan is to gut the historic neighborhoods - and, have huge opposition to the Plan - boy, you succeeded.

I have worked in the legal community my entire career and be assured that I will be contacting legal counsel to fight this matter.

Shannon Bryant

***Ms. L. Shannon Bryant***  
*Brantley Bryant Legal Consulting, LLC*  
*334 East Verde Lane | Phoenix, AZ 85012*  
*Cell Phone: 602.770.7664*



*Please consider the environment before printing this e-mail.*

**From:** [Jen LaPointe](#)  
**To:** [PDD Middle Housing](#)  
**Subject:** Historic neighborhood impact?  
**Date:** Sunday, August 10, 2025 9:31:13 PM

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Hello! I am writing to voice my concerns over the proposed zoning changes in downtown Phoenix neighborhoods, specifically federally registered historic places. To allow duplexes, triplexes or fourplexes on single family lots in registered historic neighborhoods (ie, Ashland Place) would negate the entire character and reason for the historic neighborhoods in the first place. There needs to be very specific planning involved to determine lots that make sense for this or havoc will ensue creating a mish-mash blend of issues between single family lots and multi-family lots. This needs to be thoughtful planning not a blanket rezoning. I am not against density but many lots should not be more than a main house and one ADU only. Jamming a fourplex next to a single family home will create a myriad of issues alone. Developers will buy up all the lots and true neighborhoods will be no longer.

Please tell me the historic neighborhoods would be exempt from this? Otherwise, there will be no more history-

Sincerely,

-Jennifer LaPointe, P.E., LEED AP

Take Flight, LLC

**From:** [bplasencia](#)  
**To:** [PDD Middle Housing](#); [bplasencia Plasencia](#)  
**Subject:** Willo property owner statement  
**Date:** Monday, August 11, 2025 5:51:24 PM

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Hello

My name is Beth Plasencia. I have lived in the Willo neighborhood for nine years. After raising our children in Chandler, we wanted to experience the benefits of living and working in midtown Phoenix. The uniqueness of Willo drew us in and we purchased our home.

Living in mid town does not come without its issues. HOWEVER, we feel our neighborhood and its sense of community outweighs those issues.

We bought a single family home in the Willo neighborhood which is zoned as a single family residential neighborhood. The State of Arizona and the City of Phoenix threaten our home which is also a major investment. The state laws have been passed with little or no input from citizens for superseding existing zoning and historic designations in cities. This impact on the historic districts is tremendous and potentially fatal to the neighborhood.

We bought a single family home. Never in all the states I lived in has zoning been changed lacking the input of the people that own the property. After this bill was passed by the legislature, with little or no thought on how the impacted neighborhoods would feel, the City adjusted the Central Business District boundaries that impact most of the historic communities in the city including the Willo.

A four-plex in Willo will not be affordable. Currently there are town homes for sale on first avenue that are over \$1,000,000. What it will do is lower the property values in the Willo and other historic neighborhoods. It will cause lower values for single family homes, street parking issues, traffic problems, and change the vibe of the neighborhood. How many places in Phoenix do neighbors regularly assemble for happy hours, community events and that is highly inclusive of all neighbors.

Although not able to attend tonight I will wear white clothing in spirit to support the neighborhoods. The changes that allow four-plexes is unethical if not illegal. I feel I was not given a voice rather eminent domain was implemented without fair

representation of the impacts on Willo and other historic communities. Please consider exceptions for historic areas, ones that have come back from decline. Once these historic homes are gone they never will be rebuilt.

Beth Plasencia  
326 W Windsor Ave

[Sent from Yahoo Mail for iPhone \[mail.onelink.me\]](#)

**From:** [bplasencia](#)  
**To:** [PDD Middle Housing](#); [Doug Plasencia](#)  
**Subject:** Willo property impact statement  
**Date:** Monday, August 11, 2025 5:53:10 PM

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The legislature playing partisan politics has perpetrated under false claims of affordable housing the ability to change residential densities in single family neighborhoods within one mile of a business district. This shift hits historic districts particularly hard because of the proximity of historic neighborhoods to the city centers. The cities have not as of yet effectively pushed back against this law in part due to competing agendas that pit neighborhoods against urban redevelopment funds.

In spite of partisan politics and city led special interest agendas what these officials are ignoring is that they are setting the stage for a taking of property rights. Inverse condemnation is a well understood tenet where the action of another owner or in this case government can not take action that harms another property. Second is the concept of due process where these policies and competing interests can debate community matters. A legislative hearing hardly qualifies as due process to notify those impacted and to provide a balanced voice. City officials that ignore this due process issue are likewise culpable.

As a nine year resident of a historic district impacted by this change, I implore the City to take every action to reverse this law and when the first permit comes to the City that no approvals be given that violates the bedrock constitutional principles of no taking including inverse condemnations, or that violates the premise of due process as described in the constitution.

Doug Plasencia  
326 W Windsor Ave

[Sent from Yahoo Mail for iPhone \[mail.onelink.me\]](#)

**From:** [Debby](#)  
**To:** [PDD Middle Housing](#)  
**Subject:** text amendment Z-TA-1-25-Y and rezoning case Z-3-25-4-7-8  
**Date:** Tuesday, August 12, 2025 5:11:24 PM

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I am strongly opposed to this!! This area contains the only architecture worth saving in the entire city - It has charm, community, and tradition -there is still some greenery to keep Phoenix cooler! Why quadruple the population in this tiny area when there is the entire desert around us? Where will the water come from? Why not keep the developers happy in North Phoenix where they can build the cheap tickey-tackey houses they've started?

Debby Gelbspan  
81 E Ashland Ave  
85004

# Written Testimony for Public Record

**Case:** Z-TA-1-25-Y (Middle Housing Text Amendment) and Z-3-25-4-7-8 (Companion Rezoning)

**Date:** August 14, 2025

**To:** City of Phoenix Planning & Development Department; Planning Commission; City Council

**From:** Gregg and Lisa Carrington

**Address:** 26 W Vernon Ave (Willo Historic District)

**Email:** [greggcarrington@gmail.com](mailto:greggcarrington@gmail.com)

**Residents, Willo Historic District (National Register & HP overlay)**

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## Position

We oppose Z-TA-1-25-Y and the companion Z-3-25-4-7-8 as currently drafted. We respectfully request revisions that (1) fully leverage existing historic preservation review and demolition controls in HP districts, (2) align implementation with adopted neighborhood conservation plans, and (3) prevent unintended incentives to demolish contributing historic structures.

While we strongly support protecting all of Phoenix's historic neighborhoods, we understand from the recent public meeting that the City may not be granting exemptions to the Middle Housing Law. If so, it is even more critical that this ordinance incorporate the following six amendments to ensure state compliance **and** the preservation of the character and integrity of these districts.

We support the efforts of **Save Historic AZ** and the **Willo Neighborhood Association**, specifically:

1. Exemption for historic districts from the Middle Housing Law;
  2. Using the "Business Core" section of the Downtown Code (DTC) as the Middle Housing zone — which would set the northern boundary at Palm Lane instead of Thomas Road;
  3. Including delayed implementation in the text amendment. While the law says it must be adopted by Jan. 1, 2026, it does not require immediate activation.
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## Context

The State's 2024 law (A.R.S. § 9-462.13 via HB 2721) requires cities to allow up to **four dwelling units per lot** within one mile of Downtown and limits required off-street parking to **no more than one space per unit**. State law does not exempt historic districts, but it also does not change Phoenix's existing HP design review or demolition-approval procedures.

Phoenix is home to many unique and historically significant neighborhoods — from Encanto-Palmcroft to Garfield to Coronado to Willo — each with its own architectural character. In Willo, for example, we already have historic duplexes, triplexes, and quads that fit seamlessly into our historic fabric because they were built to match the neighborhood’s scale, setbacks, and styles. The amendments we propose would allow that kind of compatible middle housing in *all* historic districts while discouraging demolition-first redevelopment and out-of-scale construction.

We also live in the most densely populated area of Phoenix, and the Willo Neighborhood has supported every multi-family housing project adjacent to our neighborhood for the past 25 years — including Tapestry, Muse, Arthaus, Willo Lofts, and more. We recognize the housing shortage, but opening historic districts to demolition and speculative redevelopment will not solve the crisis — it will only destroy irreplaceable heritage.

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## Lessons from the 1970s

Phoenix’s 1960s–70s “urban renewal” policies demolished large portions of downtown’s historic fabric. Blocks of irreplaceable architecture, including historic fire stations and early commercial buildings, were replaced with lifeless concrete structures. While Heritage Square was saved at the last moment, the broader damage is still regretted today. We should not repeat those mistakes in our historic neighborhoods.

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## Why preservation and “middle housing” can co-exist

Research from the National Trust for Historic Preservation shows that older, smaller buildings help neighborhoods thrive economically, socially, and environmentally. Adaptive reuse avoids the problems created by demolition and maintains the unique character that draws people to our city.

Middle housing can and should be integrated into historic districts — but only if design, scale, and reuse are prioritized over demolition.

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## Specific Concerns

1. **Demolition Risk in HP Districts** – Without strong reinforcement of HP rules in this ordinance, there is an incentive to demolish contributing homes and replace them with box-style fourplexes built to minimum parking standards.
2. **Parking Impacts** – The state parking cap (1 space per unit) will cause spillover onto already-congested streets unless paired with curb-management tools.

3. **Conflict with Conservation Plans** – Adopted neighborhood conservation plans emphasize rehabilitation and compatibility; this amendment could shift economics toward teardown if left unchecked.
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## What Still Applies in Historic Neighborhoods

- **HP Design Review** – COA or CNE required for exterior changes and infill.
  - **HP Demolition Approval** – Separate HPO review and hardship process still required for demo of contributing structures.
  - **Local Authority Remains** – Council can reinforce HP rules in the MHOD text and pair the overlay with parking management, adaptive-reuse incentives, and extended demolition holds.
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## Six Required Amendments

1. **HP Applicability Clause:** All middle housing in HP districts must follow HP design review and demolition approval procedures — including Certificates of Appropriateness/No Effect, demolition approval, and the Certification of Economic Hardship process.
  2. **Form Compatibility:** Require middle housing in HP districts to match the same frontage, setbacks, height planes, lot coverage, and porch/entry patterns already required for single-family homes in the district’s HP guidelines. This allows neighborhoods like Willo to continue integrating duplexes, triplexes, and quads that match the historic fabric, while preventing out-of-scale or incompatible new builds.
  3. **Adaptive-Reuse Incentive:** Create a fee reduction and expedited review for projects that add units by converting the interior of existing contributing homes instead of demolishing them.
  4. **Curb Management Commitment:** Pair the overlay with Residential Permit Zones or similar curb-management tools so parking caps don’t overwhelm historic streets.
  5. **Annual Report:** Require staff to track and report demolitions, adaptive reuse vs. teardowns, and parking impacts in HP districts every year.
  6. **Extended Demolition Hold:** Increase the demolition hold period for contributing historic properties in HP districts from the current 1 year to 2 years, allowing more time to explore preservation and adaptive-reuse options before historic structures are lost.
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## Legal Defensibility

These six amendments are fully compatible with A.R.S. § 9-462.13. The statute establishes minimum entitlements for middle housing but explicitly leaves in place local Historic Preservation design review, demolition controls, and administrative procedures. None of these

amendments reduce the number of units allowed, impose a more restrictive process than that applied to single-family homes in the same HP district, or increase parking requirements beyond the state cap. Instead, they operate within the City's retained authority to manage design, demolition timing, and neighborhood compatibility — tools the state deliberately left in local hands.

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## **Conclusion**

Since no exemptions will be provided for historic districts, the only path to protecting the character of Phoenix's historic neighborhoods while meeting state housing mandates is to embed these six amendments into Z-TA-1-25-Y / Z-3-25-4-7-8.

Phoenix can comply with state law **and** ensure that middle housing in historic districts is compatible, context-sensitive, and preservation-minded. Please adopt these changes before final approval.

**Respectfully,**  
Gregg and Lisa Carrington  
Residents, Willo Historic District



Save Historic AZ

RCVD 9/29/2025

**Save Historic AZ**

PO Box 33922

Phoenix, AZ 85067

savehistoricaz@gmail.com

Dear Honorable Councilmember,

We are writing to urge you to recognize that the Middle Housing Law does not apply to Phoenix's historic neighborhoods, nor should it.

Historic neighborhoods are already entitled to more diverse housing options. These areas, including Willo, F.Q. Story, and others, already support density with historic duplexes and casitas (ADUs). The Middle Housing law aims to introduce multi-family options in areas restricted to single-family use. That is not the case in our historic districts, which are already zoned for higher density.

The **Phoenix Zoning Code** reinforces this:

- R1-6 lots subdivided prior to 1998 are already entitled to duplexes (Table 6.13B).
- R1-10 lots subdivided prior to 1999 have similar entitlements (Table 6.11B).
- These properties are explicitly described as having "multi-family development" potential, and are therefore not classified as "single-family residential zoning"—which is the key condition required for the Middle Housing Law to apply.

If the Legislature had intended this law to override all zoning classifications, it could have done so. Instead, it limited the law's scope. Applying it where it does not belong undermines the intent of both the statute and our city's historic preservation goals.

Applying this law to historic neighborhoods poses an existential threat to those districts. Once a district falls below 51% contributing structures, it risks losing its historic designation entirely. The City has invested significant federal, state, and local funding into preserving these neighborhoods and in encouraging residents to restore and live in them.

Allowing the Middle Housing Law to take root in historic areas would:

- Incentivize demolition of historic homes,
- Accelerate the erosion of historic character, and
- Transfer wealth from residents to institutional investors operating four-plexes as short-term rentals.

This is not hypothetical—it is already happening in cities that failed to protect their historic cores. We ask the City to formally adopt this legal interpretation: The Middle Housing Law does not apply to our historic districts. We urge you to stand with us in defending Phoenix's legacy neighborhoods from inappropriate zoning changes that will permanently alter their character.

For more information on the tremendous cultural and economic value these districts provide, we invite you to review this report: <https://www.placeeconomics.com/resources/preservation-phoenix-style/>

Thank you for your service to our city and for helping us preserve its unique history.

Sincerely,

Bradley Brauer, President,  
Willo Neighborhood Association  
Co-Chair, Save Historic AZ

Opal Wagner, Co-Chair,  
Save Historic AZ

Robert Warnicke  
Robert Warnicke Law PLC

Elle January, President,  
Los Olivos Historic Neighborhood

Sasha Robinson, President  
Story Preservation Association

<https://savehistoricaz.com>

**From:** Paul Zagnoni <pzagnoni@gmail.com>  
**Sent:** Thursday, October 2, 2025 11:56 PM  
**To:** PDD Planning Commission  
**Subject:** A.R.S. Section 38-431.02

Dear Honorable Councilmembers, I am writing you as an owner of a historic home in LA Hacienda for over 25+ years to urge you to recognize that the Middle Housing Law does not apply to Phoenix's historic neighborhoods, nor should it.

Historic neighborhoods are already entitled to more diverse housing options. These areas, including Willo, F.Q. Story, and others, already support density with historic duplexes and casitas (ADUs). The Middle Housing law aims to introduce multi-family options in areas restricted to single-family housing, which is not the case in our historic districts, which are already zoned for higher density.

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If the Legislature had intended this law to override all zoning classifications, it could have done so. Instead, it limited the law's scope. Applying it where it does not belong undermines the intent of both the statute and our city's historic preservation goals.

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Thank you for your service to our city and for helping us preserve its unique hheritance.

Paul Zagnoni

602-571-1681 cell

**From:** Laura Zagnoni <laura.zagnoni@gmail.com>  
**Sent:** Friday, October 3, 2025 12:06 AM  
**To:** PDD Planning Commission  
**Subject:** Middle Housing (Z-TA-1-25-Y and Z-3-25-4-7-8)

For meeting occurring on October 6, 2025, 6:00 pm, Agenda item #2:

Save Historic AZ

Dear Honorable Councilmembers,

I am writing to urge you to recognize that the Middle Housing Law does not apply to Phoenix's historic neighborhoods, nor should it.

My family has resided in a historic district for over 25 years (Willo, and now La Hacienda) and have chosen to stay because of the value and community within these districts. We urge you to consider the points made below as well as the residents and communities that would be adversely affected.

Historic neighborhoods are already entitled to more diverse housing options. These areas, including Willo, F.Q. Story, and others, already support density with historic duplexes and casitas (ADUs). The Middle Housing law aims to introduce multi-family options in areas restricted to single-family housing, which is not the case in our historic districts, which are already zoned for higher density.

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If the Legislature had intended this law to override all zoning classifications, it could have done so. Instead, it limited the law's scope. Applying it where it does not belong undermines the intent of both the statute and our city's historic preservation goals.

Applying this law to historic neighborhoods poses an existential threat to those districts. Once a district falls below 51% contributing structures, it risks losing its historic designation entirely. The City has invested significant federal, state, and local funding into preserving these neighborhoods and in encouraging residents to restore and live in them.

Allowing the Middle Housing Law to take root in historic areas would:

- Incentivize demolition of historic homes,
- Accelerate the erosion of historic character, and
- Transfer wealth from residents to institutional investors operating four-plexes as short-term rentals.

This is not hypothetical-it is already happening in cities that failed to protect their historic cores. We ask the City to formally adopt this legal interpretation: **The Middle Housing Law does not apply to our historic districts.**

Thank you for your consideration and attention to this important matter.

Laura Zagnoni

**From:** PAT KORDELSKI <patkordelski@cox.net>  
**Sent:** Friday, October 3, 2025 7:49 AM  
**To:** PDD Planning Commission  
**Subject:** Bill to destroy historic neighborhoods by allowing four-plexus to be built on property  
HB 4721

I am sending my vote to disagree with the proposed legislation to allow this outrageous travesty to our historic neighborhoods. Legislating after the fact and calling it a measure to provide affordable housing is a misnomer. This is being done under the guise of providing builders and construction companies the ability to make money on the backs of hard working people who have chosen a particular area for its charm and sense of community. This is another example of our legislators doing exactly what they want to do , rather than addressing the housing problem with viable solutions.

Do not destroy our neighborhoods. We are unhappy with this piece of legislation. Shame on this commission.

Pat Kordelski



October 3, 2025

City of Phoenix  
200 W. Washington St.  
Phoenix, AZ 85003

Dear Honorable Commission Members:

On behalf of the Preserve Phoenix board, we strongly urge the commission to recognize that historic neighborhoods should be exempt from HB 2721. We are calling for the commission and city council to act immediately to adopt protective zoning amendments that recognize the unique density and character of historic districts and respect their contribution to Phoenix's identity.

HB 2721 removes local control by requiring Phoenix and other large cities to allow duplexes, triplexes, fourplexes, and townhomes "by right" in single-family zones within one mile of the Central Business District and in 20% of all new developments over 10 acres. If Phoenix does not adopt compliant zoning by January 1, 2026, this development will be automatically permitted on all single-family lots without local review — a permanent and irreversible change.

The "Missing Middle Law" aims to create multi-family options and create denser housing opportunities in the city. Phoenix's 36 historic districts — including Roosevelt, F.Q. Story, Garfield, Coronado, Willo, and others — are among the densest residential neighborhoods in the city, already zoned R-1-6, which has allowed multifamily options since 1998.

We believe that the city should work to retain robust demolition review and design guidelines for contributing structures, ensuring Certificates of Appropriateness and Certificates of Eligibility remain enforceable and advocate at the state level for legislative changes that explicitly exempt historic districts from HB 2721's mandates.

These neighborhoods have proven economic, environmental, and social value: higher property values, more walkability, greater tree cover, and stronger small-business job growth. HB 2721 provides no exemption for historic districts, risking demolition of contributing and non-contributing properties alike, and weakening the integrity of districts that depend on a majority of contributing structures to maintain historic status.

Preserve Phoenix is committed to being a partner in smart, sustainable growth that balances the need for housing with the equally urgent need to protect the cultural, economic, and



environmental value of our historic districts. Phoenix can grow without losing its soul — but only if we act now. We respectfully urge you to help protect Phoenix history and defend these historic districts that are at risk.

Sincerely,

*Erin Lindsey*

Erin Lindsey  
President, Preserve Phoenix

cc: Kate Gallego, Mayor  
Members of Council  
Joshua Bednarek, Planning & Development  
Helana Ruter, Historic Preservation Office

**From:** Christine Hall <christinehall1540@gmail.com>  
**Sent:** Saturday, October 4, 2025 9:07 AM  
**To:** PDD Planning Commission  
**Subject:** Middle Housing Agenda item

I object to Agenda Item #2 on Middle Housing (Application # Z-TA-1-25-Y)

Sent from Christine Hall, 1540 W Vernon Ave, Phoenix 85007.

**From:** Nicole Brickner <nbrickner@hotmail.com>  
**Sent:** Saturday, October 4, 2025 12:26 PM  
**To:** PDD Planning Commission  
**Subject:** Opposition proposed text amendment item 2.

My name is nicole brickner at 602 380 4670. I oppose proposed text amendment, item 2. Thank you  
-nicole brickner

**From:** Christopher Bates <chrisbates@cox.net>  
**Sent:** Monday, October 6, 2025 5:50 PM  
**To:** PDD Planning Commission  
**Subject:** Middle Housing Law

Planning Commission:

I live in Windsor Square and am opposed to the Middle Housing Law being applied in Central Phoenix, as it may negatively impact historic neighborhoods and their status. The proliferation of affordable four-plexes and other multi-family housing would surely be good for some, but could endanger the status of historic districts in our city.

Christopher Bates  
230 E. Oregon Avenue  
Phoenix, AZ 85012

**From:** walter switzer <psswitzer@icloud.com>  
**Sent:** Monday, October 6, 2025 7:16 PM  
**To:** PDD Planning Commission  
**Subject:** Historic District Change

Sent from my iPhone

Please vote against the proposal to change the Historic District rules to allow multiple units to be built on properties in our historic districts. Thank you.

Walter E. Switzer, III, Trustee  
369 E. Catalina Drive  
Phoenix, Arizona 85012