



City of Phoenix
PLANNING AND DEVELOPMENT DEPARTMENT

Staff Report
Zoning Ordinance Text Amendment
Z-TA-5-20-7
December 9, 2020

Application No. Z-TA-5-20-7: Amend Section 1202.C. (Regulating Maps, Height Map) of the Phoenix Zoning Ordinance to replace the Downtown Code Height Map to amend height provisions from a maximum height of 80-140 feet to a maximum height of 285 feet at the southwest corner of 1st Street and Jackson Street.

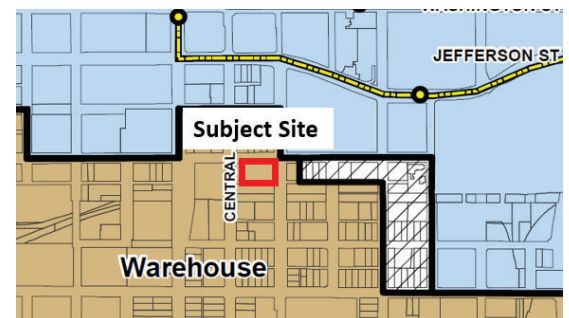
Staff Recommendation: Staff recommends denial of Z-TA-5-20-7. If approved, the height map shall be updated as shown in Exhibit A.

Background: Current Request

This request is to amend the permitted maximum building height from 80-140 feet to 285 feet. There are also two concurrent requests for this site: Z-26-20-7 is a request to rezone the site from DTC-Warehouse Character Area HP to DTC-Warehouse Character Area to remove the Historic Preservation Overlay and second, a request to remove the conservation easement on the site. The proposed development is a 26-story mixed-use building with ground floor office, retail, restaurant and hotel uses. The proposal seeks to maintain and restore the north, east and west façades of the existing historic building but remove the south façade and roof, which destroys the historical significance of the building. The text amendment is proposed to allow the requested height. The rezoning is proposed to remove the historic preservation designation and change the zoning map. Lastly, the conservation easement removal is proposed to allow the proposed high-rise redevelopment of the site.

The subject site is located on 1.30 acres at the southwest corner of 1st Street and Jackson Street in the Warehouse Character Area. The vision of the Warehouse Character Area is to be a unique urban neighborhood that offers a blend of old railroad charm and modern urban living, where the unique old warehouse buildings provide design inspiration for the design of new buildings that complement the existing character. This area has unique sports and entertainment venues, in addition to dining

Figure A: Character Area



Source: City of Phoenix Planning and Development Department

and shopping opportunities that serve the entire region. This area should provide people with the ability to enjoy the character and authenticity of the area while being close to transit and the heart of the City.

Background: Historic Designation

The subject site is used as an office building for the Arizona Opportunities Industrialization Center and is listed on the Phoenix Historic Property Register as the “Arizona Hardware Supply Company Warehouse” and on the National Historic Property Register as the “Chambers Transfer and Storage Co. Central Warehouse.” The site is listed with different names on the historic property registers because the Arizona Hardware Supply Company built the building and the Chambers Transfer and Co. was a later tenant.

To the north are the currently vacant Phoenix Merchandise Mart and the Electrical Shop and Supply Warehouse buildings in addition to the Arizona Hardware Supply Company Wholesale Warehouse building used as an office. To the south is a surface parking lot and railroad tracks. To the east is an office building known as the Western Wholesale Drug Co. Warehouse, and to the west is the vacant Phoenix Steam Laundry/Southwest Cotton Co. building. The Arizona Hardware Supply Company Wholesale Warehouse is listed on the Phoenix Historic Property Register, the Western Wholesale Drug Co. Warehouse is listed on the Phoenix and National Historic Property Registers and the other aforementioned buildings are not listed but have been recommended eligible for historic designation.

Figure B: Site Context



Source: City of Phoenix Planning and Development Department

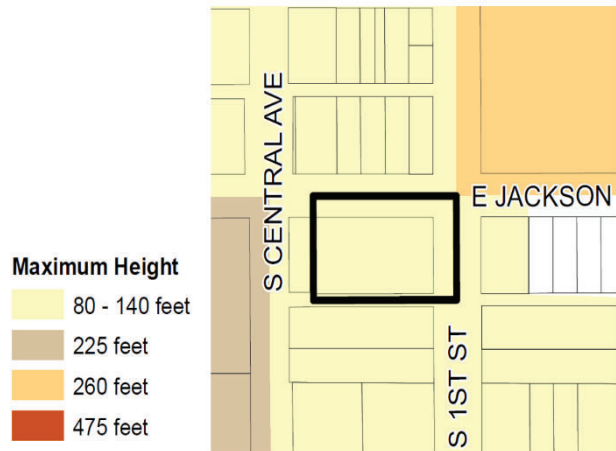
Background: Height Entitlements

The current regulating maps of the Downtown Code permit a maximum height of 80-140 feet on the site, as shown in Figure C. The parcels directly to the north, south, east and west also have a maximum height of 80-140 feet. The 80-140 feet maximum height range is explained in the Downtown Code by allowing a maximum height of 80 feet with a bonus height provision of 50 percent or 140 feet. In order to use the bonus height provision, a 30-year conservation easement for structures with HP or HP-L zoning in the

Warehouse Character Area must be in place and only when 90 percent of the eligible structures are subject to a conservation easement may other sustainability bonus options be used to achieve any height increase. The area northeast of the subject site, in the Business Core Character Area, has a maximum height of 260 feet and further west of the subject site has a 225-foot building height maximum. The current maximum height was determined by the previous zoning, Downtown Core District, Warehouse Overlay District (DC W), prior to the adoption of the Downtown Code in 2010.

The Warehouse Overlay District limited building heights to a maximum of 80 feet. In an effort to preserve historic properties in the Warehouse Overlay District, an increase in height up to 140 feet was permitted subject to the dedication of a 30-year conservation easement to the City of Phoenix for historic properties. Once 90 percent of the historic properties were preserved by a conservation easement, the building height maximum of 140 feet would be permitted by right. The Warehouse Overlay District requirements further stated that in no event can the height of the building or any improvements thereon exceed the limits contained in the Sky Harbor Airport Zoning Ordinance. When the Downtown Code was implemented, the height maximum and height bonus provisions for the Warehouse Character Area were duplicated from the Warehouse Overlay District development standards.

Figure C: Height Designations



Source: City of Phoenix Planning and Development

Background: Urban Form Project and the Downtown Code

The [Downtown Urban Form Project](#) was initiated in 2006. The Downtown Phoenix Plan is a product of the Downtown Phoenix Urban Form Project and was prepared to provide direction for implementation of the community vision for an active, pedestrian-oriented and sustainable Downtown. The Downtown Phoenix Plan was adopted by the Phoenix City Council in 2008 and served as a precursor to the Downtown Code, adopted in 2010, which is now Chapter 12 of the Phoenix Zoning Ordinance. The site is in the Warehouse Character Area in the Downtown Phoenix Plan. The vision for how the Warehouse

Character Area will develop as listed in the Downtown Phoenix Plan is that, “the Warehouse Character Area is a unique, teeming urban neighborhood that offers a blend of old railroad charm and modern urban living. Coffee houses and jazz clubs mix with trendy shops, artisan studios and galleries clustered in historic warehouses.” The Downtown Phoenix Plan lists eight policies that address specific issues or opportunities unique to the planning area. Out of the eight policies for the Warehouse Character Area, two are relevant to the request:

Policy 3-34: Encourage the preservation of entire warehouse buildings rather than just building facades whenever possible.

Policy 3-35: Support initiatives for redevelopment that encourage adaptive reuse or new development that is compatible with the existing character of the area.

Background: Transit Oriented Development Strategic Policy Framework

The [Transit Oriented Development Strategic Policy Framework](#), originally adopted in 2013, and later amended in 2016 and 2018, identifies policies and place types that are designed to shape walkable and mixed-use environments and focus redevelopment within a quarter mile of high capacity transit stations. The site is located approximately a quarter mile from the Jefferson/1st Avenue and the Jefferson/3rd Street light rail stations. The identified place type for those light rail station areas is Downtown Core. However, the TOD Place Type parameters do not apply to properties that are historic or historic-eligible, as determined by the Historic Preservation Officer. The site is listed on the Phoenix and National Historic Property Registers; therefore, the Downtown Core place type does not apply to this site. Furthermore, the Transit Oriented Development Strategic Policy Framework states that “a sense of place is a unique characteristic that contributes to an area’s vitality” and lists historic preservation as a component to creating a sense of place.

Figure D: Downtown Phoenix Plan Character Area



Source: City of Phoenix Planning and Development Department

Aviation Department Comments

The Aviation Department opposes the proposal and requests the withdrawal of the case. The Aviation Department also provided the following findings:

1. The site's ground level (referred to as site elevation relative to mean sea level) is 1,082 feet MSL, a 285-foot structure would result in a constructed site elevation of 1,367 feet MSL. City Code, Chapter 4, Article XIII, Sec. 4-241.B "Downtown - Height Zone B", Area 2 maximum site elevation is 1,300 feet MSL. The Aviation Department presumes the Planning and Development Director will enforce the more restrictive of disparate height regulations (City Code Chapter 4 vs. Zoning Ordinance Chapter 12).
2. The applicant previously received a No Hazard Determination from the FAA for the proposed elevation height of 1,367 feet. However, the FAA did not review for a critical safety surface referred to as the one-engine inoperable (OEI) departure surface. 1,300 feet MSL, as required by City Code, ensures construction will not penetrate the OEI critical safety surface.
3. Construction above 1,300 feet MSL may result in airlines and the FAA changing certain flightpaths over the downtown area/historic properties or new FAA operating restrictions on PHX runways.

Staff Analysis

The proposal is not consistent with the policies of the Downtown Phoenix Plan. The Downtown Phoenix Plan highlights the Warehouse Character Area's conservation easement height incentive program adopted in 2007 which allows for height increases up to 140 feet subject to the dedication of a 30-year conservation easement to the City of Phoenix for historic properties. The Downtown Phoenix Plan also lists two policies regarding the preservation of entire warehouse buildings rather than just building facades, and support for initiatives for redevelopment that encourage adaptive reuse or new development that is compatible with the existing character of the area. The proposal to increase the allowable height from 80-140 feet to 285 feet and remove the conservation easement and the historic preservation overlay is not consistent with the Downtown Phoenix Plan policies to encourage the preservation of entire warehouse buildings and adaptive reuse of warehouse buildings. Additional height is not warranted at this site given the concurrent proposal to remove the historic preservation overlay and the conservation easement. Lastly, the Aviation Department opposes this request citing the proposal may result in flightpath changes over the downtown area or potential operating restrictions on runways.

Conclusion

Staff recommends denial of Z-TA-5-20-7 to amend the height map as shown in Exhibit A.

Writer

Sarah Stockham

December 9, 2020

Team Leader

Samantha Keating

Exhibits

Exhibit A: Proposed Language (3 pages)

Sketch Map (1 page)

Applicant Narrative, Site Plan and Elevations (6 pages)

Correspondence (8 pages)

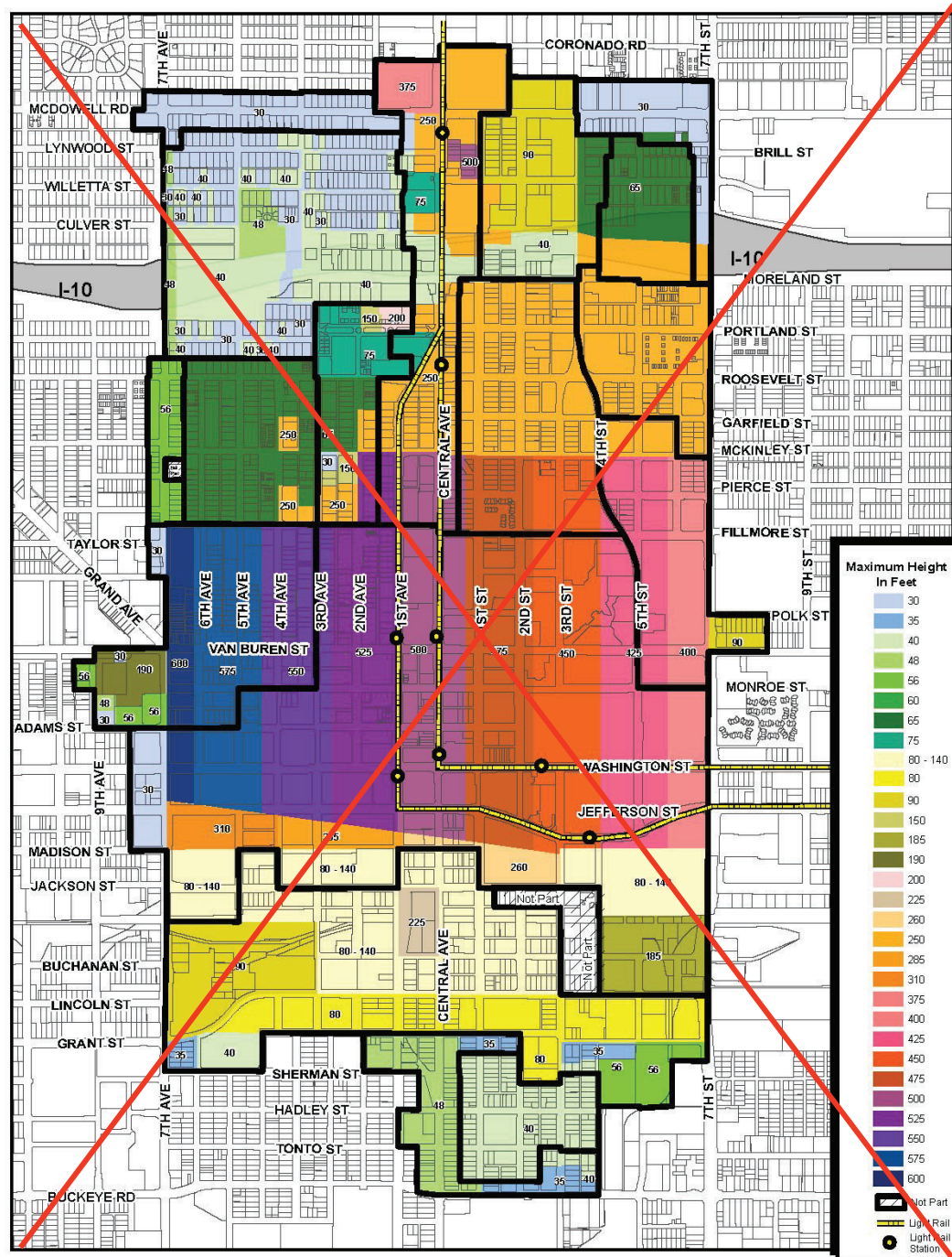
EXHIBIT A

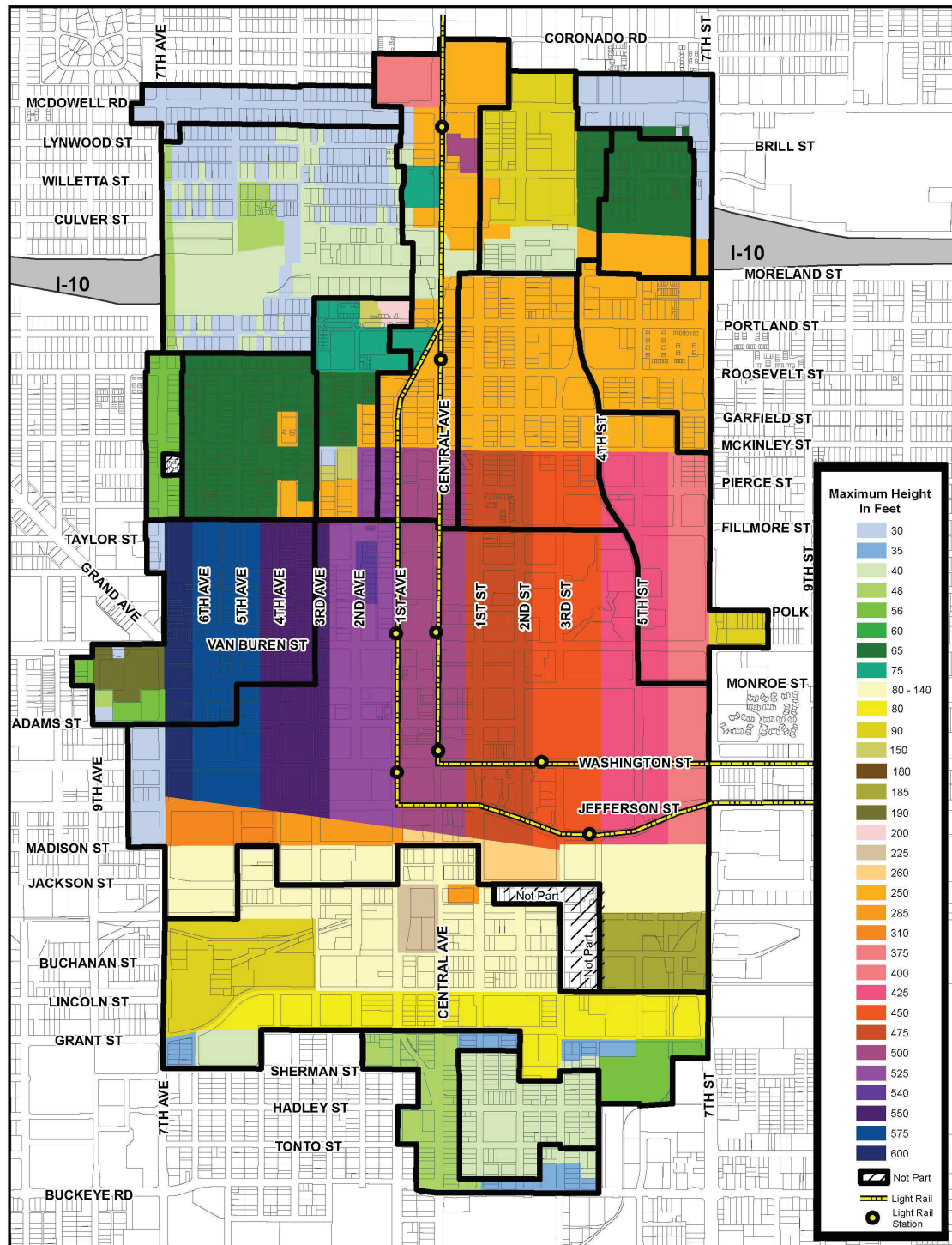
Application No. Z-TA-5-20-7: Amend Section 1202.C. (Regulating Maps, Height Map) of the Phoenix Zoning Ordinance to replace the Downtown Code Height Map to amend height provisions from a maximum height of 80-140 feet to a maximum height of 285 feet at the southwest corner of 1st Street and Jackson Street.

Staff Proposed Language That May Be Modified During the Public Hearing Process is as follows:

Amend Chapter 12, Section 1202 (Regulating Maps) by removing the old map, and inserting the new map as follows:

- D. The height for any property in the Downtown Area shall not exceed the following unless a height bonus is allowed by the Character Area and approved by Planning and Development Department staff, or an appeal is approved by the Design Review Committee (DRC). In no event can the height exceed the airport height limit:





Text Amendment

CITY OF PHOENIX ♦ PLANNING & DEVELOPMENT DEPARTMENT ♦ 200 W WASHINGTON ST ♦ PHOENIX, AZ ♦ 85003 ♦ (602) 262-6882





APPLICATION NO: TA-5-20-7 (Maximum Height Map)	ACRES: 1.30 +/-
VILLAGE: Central City	COUNCIL DISTRICT: 7
APPLICANT: Nick Wood, Esq., Snell & Wilmer, LLP	

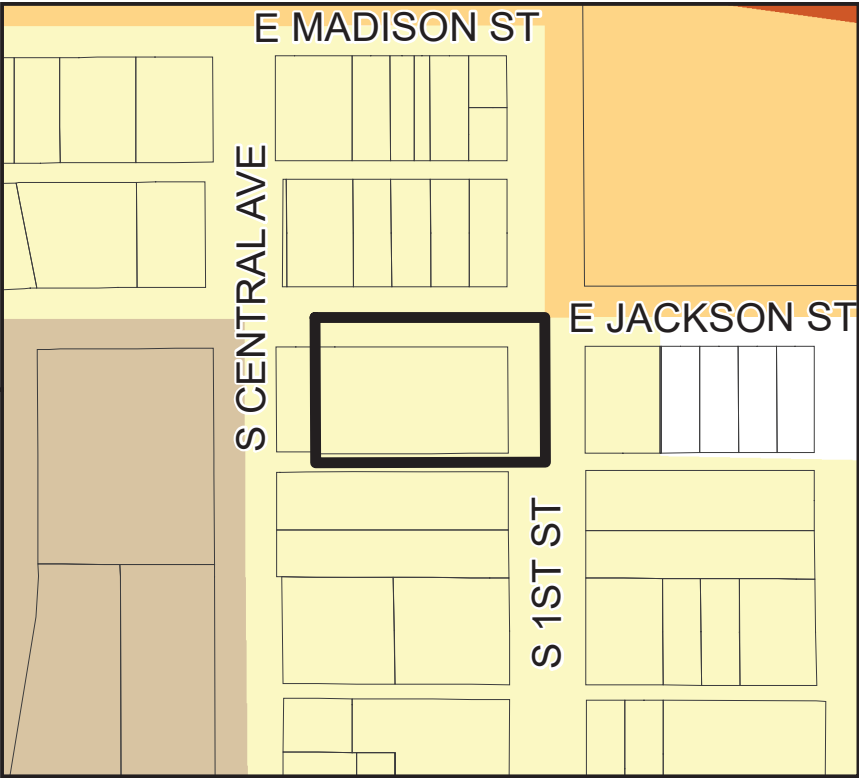
EXISTING:

Maximum Height 80-140' (1.30 +/- Acres)

 Proposed Change Area


Maximum Height

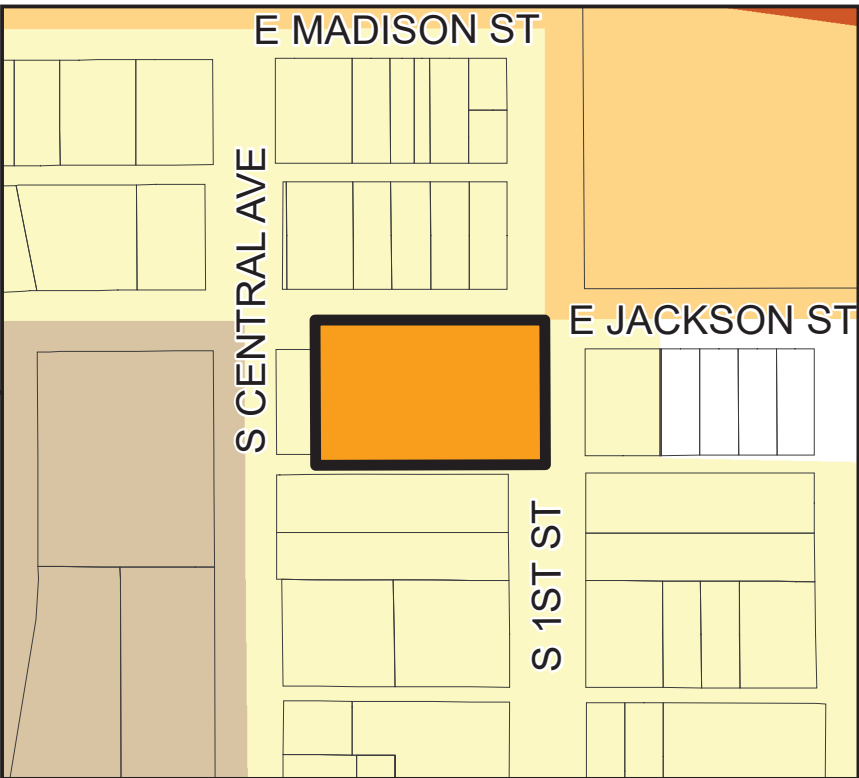
-  80 - 140 feet
-  225 feet
-  260 feet
-  475 feet



PROPOSED CHANGE:

Maximum Height 285' (1.30 +/- Acres)

 Proposed Change Area



Snell & Wilmer

ONE ARIZONA CENTER
400 E. VAN BUREN, SUITE 1900
PHOENIX, AZ 85004-2202
602.382.6000 P
602.382.6070 F

Nicholas J. Wood
(602) 382-6269
nwood@swlaw.com

June 3, 2020

Sarah Stockham
Central City Village Planner
Planning and Development Department
City of Phoenix
200 West Washington Street
Phoenix, Arizona 85004

Re: Text Amendment to the Downtown Code's Maximum Building Height Regulating
Map, Section 1202.C of the City of Phoenix Zoning Ordinance

Dear Sarah:

On behalf of 39 East Jackson, LLC, I am pleased to submit for your review and comment the enclosed text amendment to the City of Phoenix Zoning Ordinance for the property located at 39 East Jackson Street, otherwise known as Maricopa County Assessor's Office Parcel Number ("APN") 112-27-107D (the "Property"). The Property is currently zoned Downtown Code ("DTC"), Warehouse Character Area and is also subject to the Historic Preservation Ordinance ("HP").

According to the research undertaken regarding the Property, it is understood that it was originally developed in 1922 as a single story, large warehouse/distribution complex for several different occupants, including the Chambers Transfer and Storage Company. Overtime, modifications were made to the building to incorporate an office component, add a second story to the building, modify certain exterior elements, and other changes.

Approximately 53 years ago, the Property was acquired by the Arizona Opportunities Industrialization Center ("OIC"), a private, non-profit, community-based organization designed to address the critical employability needs of Phoenix's economically disadvantaged and ethnic minority residents. Since 1967, OIC has served over 50,000 people and placed more than 30,000 individuals in meaningful jobs.

OIC has an opportunity to redevelop the Property with a legacy scale project aimed at providing a long-term funding source for their ongoing job training and other community benefiting endeavors, while incorporating tenants that can offer "real world" job training

Snell & Wilmer

Sarah Stockham

June 3, 2020

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opportunities (as well as space for OIC's headquarters' functions). The redevelopment of the Property also provides an opportunity to preserve what an historically vital vocational institution that for 53 years has maintained a prominent place in Phoenix's short 108 year history. OIC has done more for the economically disadvantaged and ethnic minority residents of the City of Phoenix, and by extension the entire City, than any other organization in the City's history. Therefore, the preservation of OIC, which is part of the historical fabric of the City, is paramount. Absent the approvals requested herein, OIC cannot sustain itself.

The Project is a redevelopment of the Property that will consist of an adaptive reuse of the existing structure as part of a mixed-use development that will include hotel, restaurant, retail (an urban grocery tenant is strongly desired) as well as for-sale luxury condominiums and OIC's offices ("the Project"). However, in designing a project that both preserves a historic building while seeking to develop a world-class mixed-use development, the Property becomes challenging when designing a structure that meets today's modern building code and related ordinance requirements. As such, it has become necessary to increase the allowable height on the Property in order to facilitate this truly one-of-a-kind legacy opportunity.

The objective of this amendment is to establish development standards for this parcel that are consistent with modern development requirements as well as the specific site-context conditions not fully addressed when the ordinance was adopted. This modification is necessary for 39 East Jackson to preserve the historic building façade and to develop a high-quality mixed-use development, as described herein.

Requested Amendment - Section 1202.C – Height Regulating Map. The DTC contains specific height requirements for properties within Downtown Phoenix that are understood to be based upon a mix of the (i) zoning entitlements that existed at the time of the adoption of the DTC and (ii) a reflection of the anticipated heights as found in the City's Airport Height Ordinance. At the time of its adoption, the DTC reflected the then existing conditions and development trends. As a result, development standards were designed to reflect the development realities of the day. In the Warehouse area, due to its smaller blocks and location "south of the tracks" that vision was for smaller buildings, with a focus on commercial and restaurant/entertainment uses. While residential uses were identified as desirable for the area, these were not contemplated in any sort of larger mixed-use developments. In fact, the only large-scale concept envisioned at that time was the Jackson Street entertainment area, which was specifically left out of the Downtown Code.

Since the original implementation of the DTC, demographics and market demands have changed significantly. Current development trends include significantly more residential living the Warehouse area. In addition, mixed-uses are even more desirable for ownership product (such as this project). In this case, the inclusion of retail, dining, luxury hotel and condominiums into one project will create a destination building for visitors and residents alike. This type of mixed-use development was simply not contemplated when the Downtown Code was adopted.

Snell & Wilmer

Sarah Stockham

June 3, 2020

Page 3

While changing development trends alone justify an increase in allowable height, the Project is also centered around preserving the historic building that has existed in this location since 1922. OIC, a prominent non-profit that has operated in this space for more than 50 years, is seeking to be part of a legacy project, ensuring the organization's future while also becoming part of a world-class development serving to anchor and breathe life into the Warehouse District. Designing a high-rise around and within an existing historic building is a monumental challenge for even the best engineers and architects, requiring custom engineering, building materials, and uniquely crafted calculations and designs.

Preserving this building and OIC's space are essential to this Project. In order to accommodate this effort while also providing larger high-rise incorporating a mix of uses, an increase in allowable height is required. The purpose of this request is to amend the Height Regulating Map for the Property from a maximum of 80 to 140 feet to 285 feet to facilitate development of a signature development in this location. The resultant development will preserve a historic structure, provide a much-needed revenue stream for the OIC organization, and create and mixed-use development that will anchor the Warehouse District for years to come.

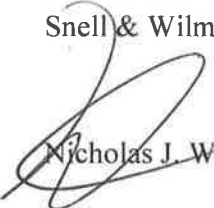
Further, according to Section 1220.A of the Zoning Ordinance, the developments within the Warehouse District should provide people with the opportunity to enjoy the character and authenticity of the area, while also being close to transit and the heart of the City. Approval of the request will allow for just such a development – one that acknowledges the area's past and will serve to protect and promote its future.

Conclusion. The purpose of this request is to amend the Height Regulating Map for the Property from a maximum of 80 to 140 feet to 285 feet. Approval of this request would permit preservation of the façade of the historic OIC building and the development of a legacy mixed-use project that will address market demands while also meeting the intent and purpose of the Warehouse District Character Area. Exhibit A illustrates the desired modification to the Height Regulating Map.

We look forward to discussing the Project with you further at your next available hearing date. In the interim, please contact me should you have any questions.

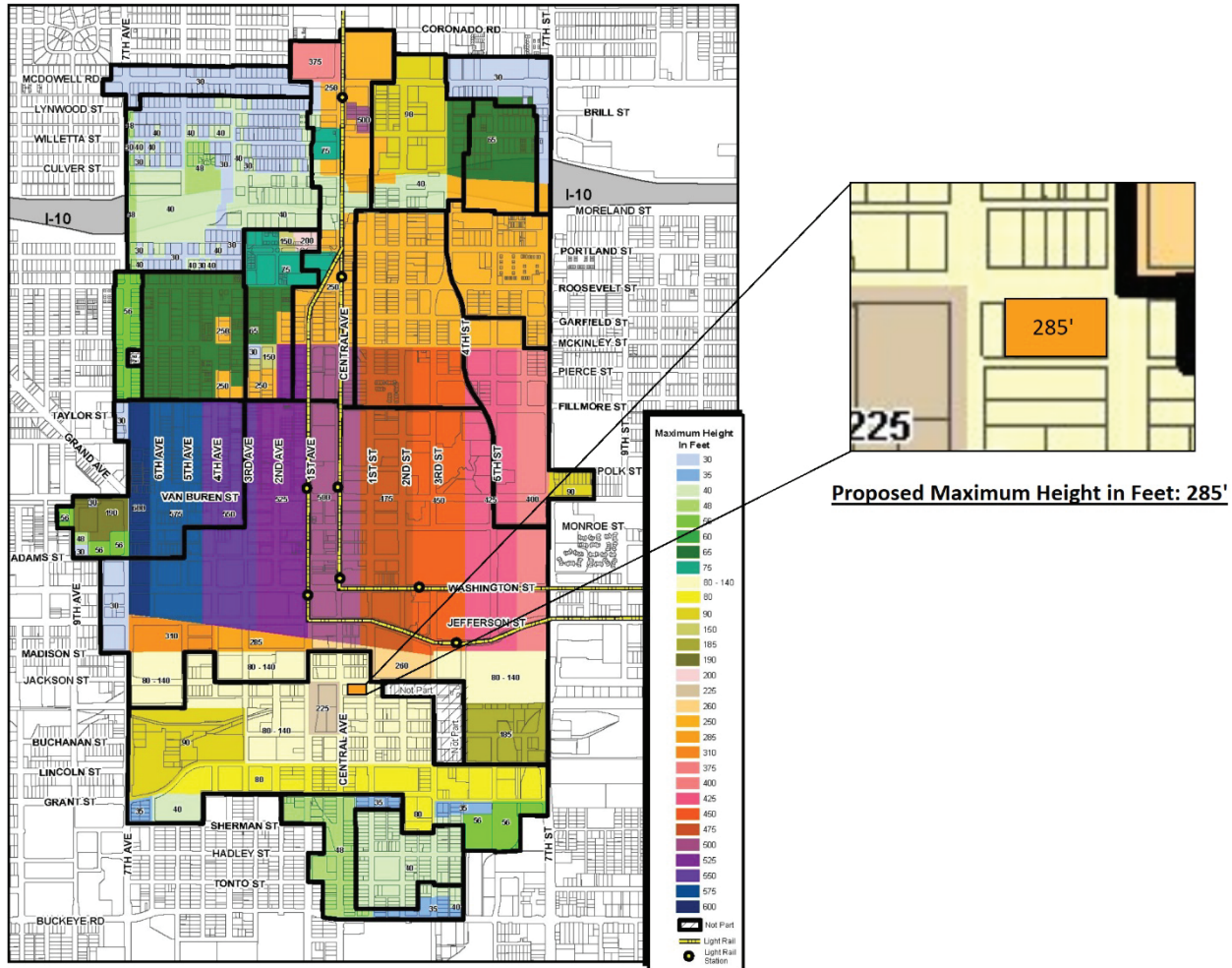
Respectfully submitted,

Snell & Wilmer



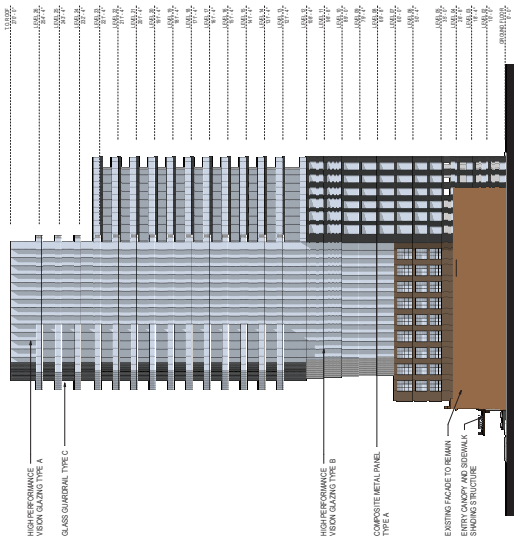
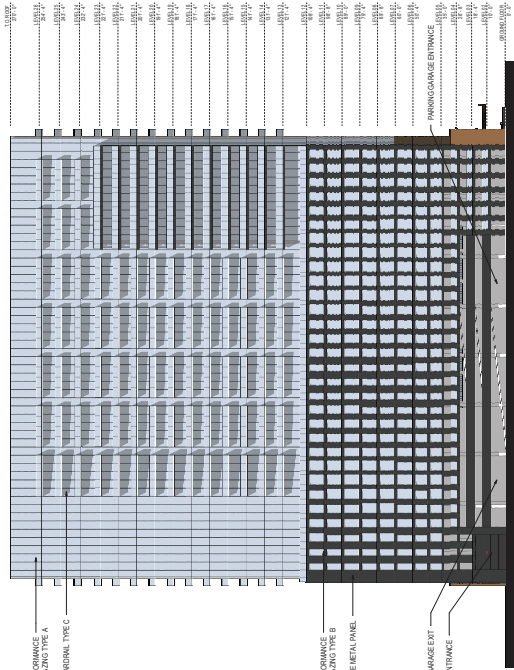
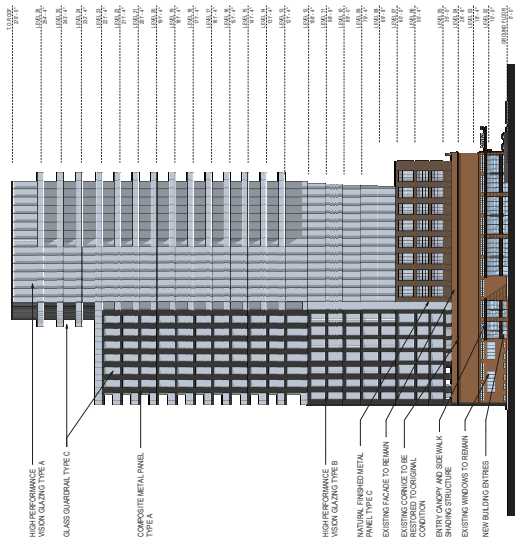
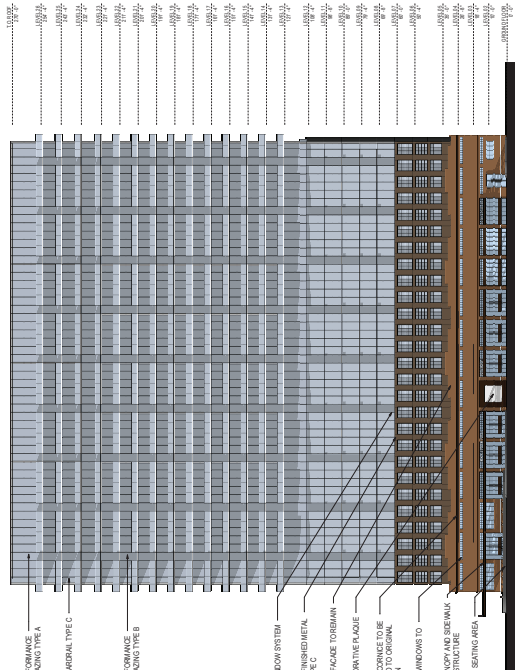
Nicholas J. Wood

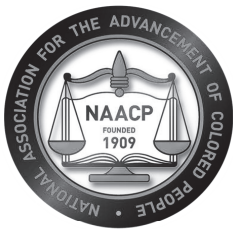
Exhibit A – Proposed Height Regulating Map



CITY OF PHOENIX APPROVAL BLOCK

Author	Dr. Sam
Checker	Dr. Sam
Project Manager	PMA Thunderbird Legacy 39 E Jackson Moe
2024 Revision	
ELEVATIONS	Cladding
Scale	PA1.000





Maricopa County Branch

**NATIONAL ASSOCIATION for the
ADVANCEMENT OF COLORED PEOPLE**

P. O. Box 20883

Phoenix, AZ 85036

Tel: 602-252-4064

Email: admin@naacpmaricopaaz.org

www.maricopanaacp.org

October 9th, 2020

To Whom It May Concern

This communication is a support endurance for Arizona Opportunities Industrialization Center (AZOIC). AZOIC has been a pillar in the community since its beginning in 1967.

Arizona OIC has served over 65,000 people and placed more than 48,000 clients in meaningful jobs. Many educational programs are offered to the community by AZOIC such as; Basic Education, GED Preparation courses and Computer Literacy course.

Services are provided for mostly economically disadvantaged individuals facing significant barriers to employment. Arizona OIC serves high school dropouts, teenage parents, ex-offenders and displacement homemakers, as well as others in need of services.

The Maricopa County Branch of the NAACP highly values the many contributions provided to the community by AZOIC.

Sincerely,

Karen Hardin, Ed.D., Branch President

From: [Maria Salazar](#)
To: [Sarah Stockham](#)
Subject: Item # 4 - OIC Project
Date: Monday, October 12, 2020 1:01:01 PM

My name is Eli Medina. I was fortunate enough to receive funds from OIC to attend barber school. Upon completion of barber school my counselor blessed me with a brand new set of work tools. I was able to go on to not only work as a barber but also open my own barber shops. I am forever grateful for the opportunity that was given to me. I'm hoping to be able to return to OIC one day to be able to volunteer my services in some way. This agency was able to do good work when the funds were there. I hope they are able to get back to helping the community.

From: [Eliza Harper](#)
To: [Sarah Stockham](#)
Subject: Item 4 OIC Project
Date: Monday, October 12, 2020 1:05:05 PM

My name is Danice. I was able to take part in the summer work experience program through OIC. I live with my single father who at the time was not working. Being able to work the summers I was able to buy my own school clothes and supplies. The job was a blessing for me and my family. Even after the program ended, the staff reached out to me to offer my family tickets to events at the arena. If not for OIC we would not have been able to experience a lot of the events that we were able to be a part of. OIC does a lot of good for the youth. I hope they are able to continue.

From: [Eliza Harper](#)
To: [Sarah Stockham](#)
Subject: Comment for Item # 4 / OIC Project
Date: Monday, October 12, 2020 12:52:19 PM

My name is Eliza, a former employee of AZ OIC. Working at OIC was one of the most fulfilling jobs I have had. We were making a difference in the lives of so many people. To this day, I run into people who thank me for the work we were doing at OIC. Working for Gene Blue was truly an honor. I've never worked for someone as caring as him. He is a true example of a leader who treated his staff and customers with the utmost respect despite anyone's circumstances. He never just stayed in his office and attend important meetings with the higher ups. He made sure that anyone who walked through their doors was good and received the services they needed. Unfortunately due to a lack of funding, I was not able to continue on with the agency. However, because I believe in the work that is being done by the agency I have made myself available as a volunteer. I will always be available to this agency because the work that is being done is important. I pray things go in the favor of Az OIC and they are able to continue on doing the good work that is needed in Phoenix.

From: [Samariah Riggins](#)
To: [Sarah Stockham](#)
Subject: Item #4 OIC Project
Date: Monday, October 12, 2020 12:56:09 PM

My name is Samariah and I am speaking out as a student who has received services from OIC. I was able to work at OIC during the summers through the Summer Work Experience programs. In addition to work experience, I was blessed with scholarships to help pay my tuition at Northern Arizona University. I appreciate the staff at OIC who have reached out to me even when I was not working to make me aware of opportunities that they knew I would benefit from. The staff at OIC are truly for the people. I remember a time when the halls were full of people. It is sad that they are not able to provide more services because it is needed. I hope that this new development provides OIC with the revenue needed to begin to offer more services and fill the hallways again with people. There are so many more students who will need their services.

From: [Warren H. Stewart Sr](#)
To: [Sarah Stockham](#)
Subject: 39 E. Jackson Street -- Phoenix OIC Property -- Item 4
Date: Monday, October 12, 2020 1:26:38 PM

Dear Sarah,

Greetings and blessings.

I am writing on behalf of the 39 E. Jackson Street property that has been occupied by the Phoenix OIC for 50 years, which is item 4 on the agenda.

The African American Christian Clergy Coalition, which represents over 100 predominantly African American churches and clergy in the Valley of the Sun, has worked with the City of Phoenix and the Phoenix OIC over the last two decades.

The proposed project by the Phoenix OIC to develop that historic property into a hotel and job development center provides a way in which the Phoenix OIC may continue to impact the people of Phoenix in a beneficial manner as well as provide financial stability for the nonprofit organization for decades to come. We also believe that this proposed project would be one of very few projects established by people of color in the overall development of downtown Phoenix.

Therefore, the African American Christian Clergy Coalition supports the Phoenix OIC seeking approval of this project proposal.

Thank you for your consideration of this proposed project and our support of it.

Keep the faith and be encouraged.

Dr. Warren H. Stewart, Sr., Chairperson
AACCC

Sent from my Verizon LG Smartphone

From: [Eric Johnson](#)
To: [Sarah Stockham](#)
Cc: [Eric Johnson](#)
Subject: Application #Z-TA-5-20-7
Date: Sunday, September 27, 2020 12:51:15 PM

Good morning Ms. Stockham,

I am writing to express my extreme opposition to this application to increase the height limit for this site in the Warehouse District. Allowing this to be approved will continue to erode the unique fabric and character of downtown Phoenix and the Warehouse District.

In addition, I find it obscene to consider tearing down any structure - especially one that is on the National Register of Historic Places as well as the Phoenix Historic Property Register - to build a high rise multi-purpose facility given the numerous empty sites immediately adjacent to the downtown area where high rise buildings make significantly more sense from a business, land use and city planning perspective. Many of these empty sites are the result of Phoenix's historic disregard for the unique character of downtown neighborhoods in favor of short sighted business interests. These types of actions need to stop.

As Phoenix continues to attract new businesses and diverse residents, it is imperative that we maintain the components of the city that make it such an exciting and innovative place to live. Areas like the Warehouse District are significant contributors to that excitement and innovative character.

Sincerely

Eric Johnson

Eric D. Johnson
1801 E Oregon Ave
Phoenix, AZ 85016
412.512.5785
ericjohnson.edj@gmail.com

From: [Roger Brevoort](#)
To: [Sarah Stockham](#)
Subject: Rezoning of the Arizona Hardware Supply Warehouse
Date: Monday, October 12, 2020 5:19:51 PM

Sarah:

RE: Z-TA-5-20-7

On behalf of Preserve PHX, the advocacy voice for historic preservation on Phoenix, I want to STRONGLY OPPOSE the height variance for the property at the southwest corner of Jackson Street and First Street.

This is only the first of several steps being proposed by the developers that could ultimately lead to the demolition of the Arizona Hardware Supply Company Warehouse, a building constructed in 1923 and listed on the **Phoenix Historic Property Register and the National Register of Historic Places**.

There is very strong opposition in the preservation community. and from the supporters of the warehouse district. The initial post on Facebook regarding this pending variance reached 15,242 people.

We also note that the **City Historic Preservation Office holds an easement on the building**. While the building has seen some alteration along the main facade, its form, roofline, and windows are all apparent. It would not be hard to restore it back to the original appearance.

The project will effectively demolish the building, although supporters claim they will retain the east and west facades as a gesture to the Warehouse District and the character of Jackson Street. In effect, this is "facadectomy" which is **not an acceptable preservation practice on the national scene**. Further, the whole concept **undermines the spirit and intent of the Phoenix historic preservation program** and the legal intent of designation.

The proposed 285 foot new structure would **overwhelm the entry point** of the Warehouse District from the perspective of urban scale and overall context of an area that is already fragmented.

Preserve PHX is strongly opposed to the proposed variance.

Sincerely.

Roger Brevoort, **for PRESERVE PHX.**
602-690-8080