

ATTACHMENT B



City of Phoenix

PLANNING AND DEVELOPMENT DEPARTMENT

**Staff Report Z-59-A-13-1
(Metrocenter PUD – Major Amendment A)
September 15, 2022**

North Mountain [Village Planning Committee](#) Meeting Date: September 21, 2022

[Planning Commission](#) Hearing Date: October 6, 2022

Request From: [PUD](#) (Planned Unit Development) (130.77 acres), [RSC](#) (13.19 acres)

Request To: [PUD](#) (Planned Unit Development) (143.96 acres)

Proposed Use: Major amendment to the Metrocenter Planned Unit Development allow commercial and residential uses

Location: Approximately 605 feet south of the southeast corner of 28th Drive and Peoria Avenue

Owner: Realm Pennant Retail Partners, LLC, et al.

Applicant: Steve Sirang, Concord Wilshire Capital, LLC

Representative: Kurt Waldier, Beus Gilbert McGroder, PLLC

General Plan Conformity			
General Plan Land Use Map Designation		Commercial	
Street Map Classification	Peoria Avenue	Arterial	+95-foot south half street
	North 29th Avenue	Collector	35-foot east and west half street
	North 31st Avenue	Collector	33-foot east half street
	Black Canyon Highway	Freeway	Approximately 165-foot west half street
	Metro Parkway Loop	Collector	43.5-foot west half street Varies 43.5 to 57.5 east half street
	Cheryl Drive	Collector	Varies +66-foot full street
	Mission Lane	Collector	Varies +66-foot full street

CONNECT PEOPLE AND PLACES CORE VALUE; CORES, CENTERS & CORRIDORS; LAND USE PRINCIPLE: Locate land uses with the greatest height and most intense uses within village cores, centers and corridors based on village character, land use needs, and transportation system capacity.

and

CONNECT PEOPLE AND PLACES CORE VALUE; CORES, CENTERS & CORRIDORS; DESIGN PRINCIPLE: Promote development in compact cores, centers and corridors that are connected by roads and transit, and are designed to encourage walking and bicycling.

The original Metrocenter PUD established a framework of development standards to implement transit oriented development in the North Mountain Village Core. The PUD allowed for significant height and commercial intensity based on its location in the village core and proximity to the planned light rail station. The proposed Major Amendment adds property to the Metrocenter PUD within the North Mountain Village Core, provides additional flexibility related to multifamily density, and does not significantly alter other elements of the entitled PUD.

BUILD THE SUSTAINABLE DESERT CITY CORE VALUE; TREE AND SHADE; DESIGN PRINCIPLE: *Integrate trees and shade into the design of new development and redevelopment projects throughout Phoenix.*

The original Metrocenter PUD utilized the Walkable Urban Code for all future development and redevelopment. The Walkable Urban Code is a form-based code designed to facilitate transit oriented development and the creation of safe and well shaded pedestrian environments. The proposed Major Amendment adds property to the Metrocenter PUD within the North Mountain Village Core but does not significantly change other elements of the entitled PUD.

Applicable Plans, Overlays, and Initiatives

[Transit Oriented Development Strategic Policy Framework](#): See Background Item No. 6.

[North Mountain Redevelopment Area Plan](#): See Background Item No. 7.

[North Mountain Village Character Plan](#): See Background Item No. 8.

[Tree and Shade Master Plan](#): See Background Item No. 9.

[Black Canyon/Maricopa Freeway Specific Plan](#): See Background Item No. 10.

[Housing Phoenix](#): Background Item No. 11.

[Complete Streets Guidelines](#): See Background Item No. 12.

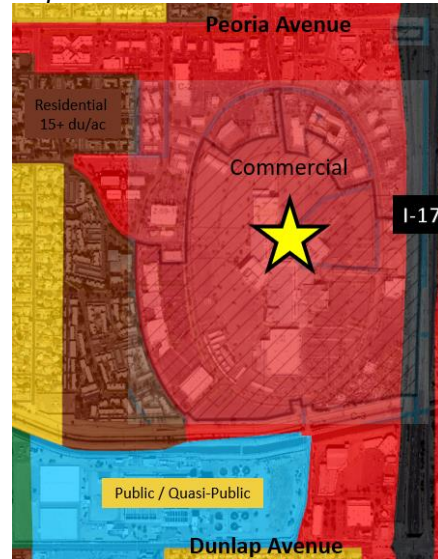
[Reimagine Phoenix](#): See Background Item No. 13.

Background/Issues/Analysis

SUBJECT SITE

1. The subject site is located approximately 605 feet south of the southeast corner of 28th Drive and Peoria Avenue. The proposed Major Amendment A to the Metrocenter Planned Unit Development proposes two primary changes to the PUD approved by Rezoning Case No. Z-59-13-1. First, the request would add the former Dillards parcel by rezoning 13.19 acres from RSC (Regional Shopping Center) to PUD. Second, the request would provide flexibility in how the PUD regulates multifamily density.
2. The General Plan Land Use Map designation for the subject site is Commercial. The proposed uses permitted within the PUD are broadly consistent with the Commercial designation.

*General Plan Land Use Map:
Planning and Development
Department*



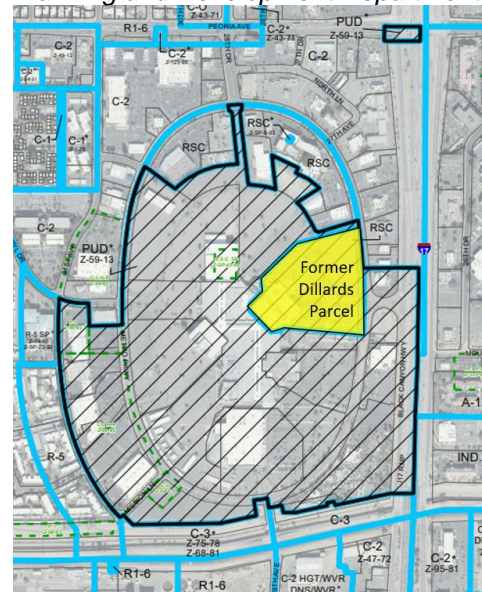
SURROUNDING USES AND ZONING

3. The proposed Major Amendment A would add 13.19 acres as depicted in the image to the right. The expansion area is adjacent to land included in the Metrocenter PUD on the west, north, south, and a portion of its east boundary.

Excluding the parcels currently within the PUD, the site being added to the PUD is adjacent to three commercial buildings zoned C-2 (Intermediate Commercial District) and developed as restaurant and retail uses.

The subject site is bound by Interstate 17 on the east, the Arizona Canal on the south, and a more varied line to the north and west.

*Subject site, annotated; Source:
Planning and Development Department*



Additionally, there is a small non-contiguous parcel at the southwest corner of Interstate 17 and Peoria Avenue that was included in the original PUD and proposed for a billboard. The subject site is not adjacent to any single-family residential development.

PROPOSAL

4. The proposal was developed utilizing the PUD zoning district. The Planned Unit Development (PUD) is intended to create a built environment that is superior to that produced by conventional zoning districts and design guidelines. Using a collaborative and comprehensive approach, an applicant authors and proposes standards and guidelines that are tailored to the context of a site on a case by case basis. Where the PUD Development Narrative is silent on a requirement, the applicable Zoning Ordinance provisions will be applied.

The proposed major amendment to the Planned Unit Development adds one 13.19 acre site as depicted in Background Item No. 3. The proposed major amendment also proposes flexibility to how multifamily density is regulated.

The original PUD required “multifamily at a minimum density of 40 dwelling units per gross acre” whereas the proposed major amendment replaces the minimum density requirement with a density target of “at least 2,800 residential dwelling units across the PUD at full build out.” The original requirement did not prescribe standards for mixed-use configurations.

The major amendment does not change any permitted uses, design guidelines, or other development standards.

5. The original PUD was approved with a stipulation to require “a shaded and segregated pedestrian circulation plan” to promote pedestrian connectivity and transit orientation for the eventual redevelopment of the subject site.

Before any building, project or use is processed for site plan approval by the city, a shaded and segregated pedestrian circulation plan for the PUD area shall be provided detailing access to the following:

- a) Existing and planned transit facilities.
- b) Arizona Canal.
- c) Cholla Library.
- d) Dedicated open space areas.

In 2020, Master Trail Plan No. 190010 was developed and administratively approved in connection with the MetroStorage development located in the westernmost anchor store of the mall complex. The Master Trail Plan included proposed routes, cross sections, and development standards for these “shaded and segregated pedestrian circulation” pathways including enhanced crossings. In 2021, the Master Trail Plan was amended to adjust the route around the light rail and transit station. Master Trail Plan No. 190010 is attached to this report as an Exhibit.

Staff recommends Stipulation No. 1.b, c, and d. to require that compliance monitoring to this stipulation be brought into the body of the PUD Development Narrative as a formal exhibit. To modify the “shaded and segregated pedestrian circulation plan,” the applicant(s) would file a Minor Amendment which would then be reviewed and approved by staff. The most notable change proposed is that “the shaded and segregated pedestrian circulation plan” would be publicly available on the City’s Planned Unit Development webpage.

STUDIES AND POLICIES

6. [Transit Oriented Development Strategic Policy Framework:](#)

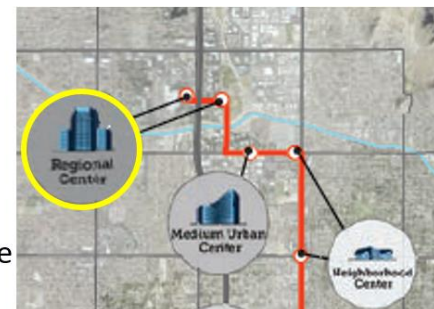
The Transit Oriented Development Strategic Policy Framework is part of the City’s General Plan. The framework identifies planning typologies to describe urban environments.

Transit Oriented Development Strategic Policy Framework; Source: Planning and Development Department

Peoria Avenue

Dunlap Avenue

Northern Avenue

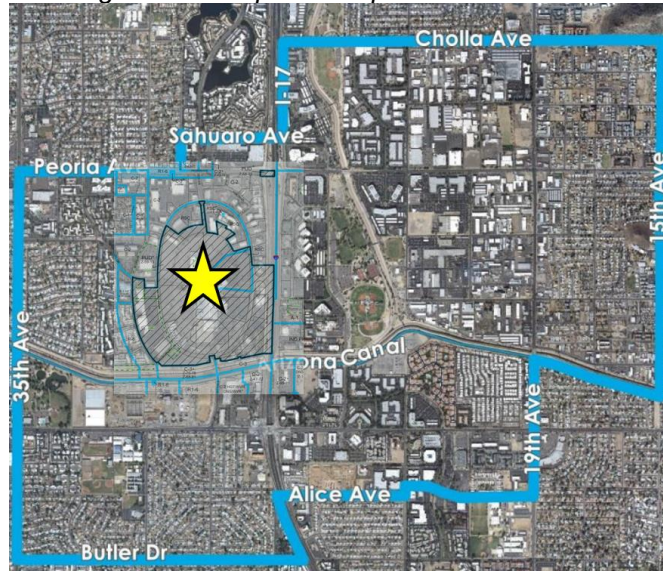


The subject site will be immediately served by the Metrocenter light rail station located which is scheduled to begin revenue service in 2024 and is identified as a Regional Urban Center Place Type. The Regional Urban Center Place Type is characterized by high intensity with building heights typically from five to 10 stories with incentive heights of up to 20 stories. Land uses may include office employment, industry cluster, high and mid rise residential, and supportive retail and commercial uses. The proposed height of up to 180 feet as permitted and envisioned in the PUD Development Narrative is consistent with the Regional Urban Center Place Type.

7. **North Mountain
Redevelopment Area Plan:**

The North Mountain Redevelopment Area, adopted in 2013, examined the general vicinity of the subject site as depicted on the right. The study calls for a myriad of efforts to advance economic development and quality of life in the area including recommendations in support of the redevelopment of Metrocenter Mall, the expansion of high-capacity transit, and the creation of alternative transportation infrastructure.

Study Boundary for the North Mountain Redevelopment Area Plan with the Subject Site Overlain; Source: Planning and Development Department



The subject site includes approximately 144 gross acres of the total 2,500 within the North Mountain Redevelopment Area. The subject site represents a central focus of the plan and the proposal will support the goal to revitalize Metrocenter Mall as a thriving economic hub with a diverse mix of uses.

8. **North Mountain Village Character Plan:**

The North Mountain Village Character Plan was approved and adopted into the Phoenix General Plan through General Plan Amendment GPA-1-19. The proposed project advances the following items identified in the Village Character Plan by redeveloping the North Mountain Village Core as a compact urban center, served by high capacity transit, with amenities including public open spaces, and connected by a system of pedestrian thoroughfares.

- Land Use Principle: Cores, centers and corridors to be configured in a walkable manner and include a variety of land uses: office, retail shopping, entertainment and cultural, housing, hotel and resort, and, where appropriate, some types of industry.
- Land Use Principle: Locate land uses with the greatest height and most intense uses within limits based on village character, land use needs, infrastructure and transportation system capacity.
- Design Principle: Promote development in compact cores, centers and corridors that are connected by roads and transit, and are designed to encourage walking and bicycling.

- Design Principle: Development should be designed to include increased amenities for transit, pedestrian and bicyclists, such as shade, water, seating, bus shelters, wider sidewalks, bike racks, pedestrian scale lighting and wayfinding.
- Design Principle: Integrate trees and shade into the design of new development and redevelopment projects throughout Phoenix.

9. **Tree and Shade Master Plan.**

The Tree and Shade Master Plan encourages treating the urban forest as infrastructure to ensure the trees are an integral part of the City's planning and development process. Sidewalks on the street frontages should be detached from the curbs to allow trees to be planted on both sides of the sidewalk to provide thermal comfort for pedestrians and to reduce the urban heat island effect.

The Planned Unit Development contains regulatory standards based on the Walkable Urban Code which is designed to create walkable and transit oriented environments with prevalent tree shade over public walkways and open space areas. These standards remain and will enhance thermal comfort and reduce the urban heat island effect as the site redevelops.

10. **Black Canyon/Maricopa Freeway Specific Plan:**

The Freeway Mitigation Program, created in the City of Phoenix by the 1988 approval of Proposition 17, authorized general obligation bonds to prepare plans and fund projects to mitigate the blighting effects on neighborhoods from existing and proposed freeway construction. The Black Canyon/ Maricopa Freeway Specific Plan study area is 32 miles long from Pinnacle Peak Road to Pecos Road. The width of the study area is one-quarter mile on each side of the freeway. The proposed amendment to the PUD does not include any new parcels in the vicinity of the freeway.

11. **Housing Phoenix:**

In June 2020, the Phoenix City Council approved the Housing Phoenix Plan. This Plan contains policy initiatives for the development and preservation of housing with vision of creating a stronger and more vibrant Phoenix through increased housing options for residents at all income levels and family sizes. Phoenix's rapid population growth and housing underproduction has led to a need for over 163,000 new housing units. Current shortages of housing supply relative to demand are a primary reason why housing costs are increasing.

The development narrative includes a density target of at least 2,800 residential dwelling units across the PUD at full build out. The proposal supports the goal

of preserving or creating 50,000 housing units by 2030 by contributing to a variety housing types that will address the supply shortage at a more rapid pace.

12. **Complete Streets Guidelines:**

In 2014, the City of Phoenix City Council adopted the Complete Streets Guiding Principles. The principles are intended to promote improvements that provide an accessible, safe, connected transportation system to include all modes, such as bicycles, pedestrians, transit, and vehicles. The development narrative contains regulatory standards to require detached sidewalks and pedestrian thoroughfares that link key destinations such as transit facilities, the Arizona Canal, the Cholla Library, and all dedicated open space areas.

13. **Reimagine Phoenix:**

As part of the Reimagine Phoenix Initiative, the City of Phoenix is committed to increasing the waste diversion rate to 40 percent by 2020 and to better manage its solid waste resources. The development narrative requires that the provision of recycling containers be identified on the site plans at the time of the site plan review process.

COMMUNITY INPUT SUMMARY

14. As of the writing of this report, staff has received one letter from Castles 'N Coasters (a voluntary participant in the Major Amendment) expressing concerns related to construction impacts, traffic impacts, and the impact of 2,800 dwelling units.

INTERDEPARTMENTAL COMMENTS

15. The Street Transportation Department noted existing requirements in the PUD for 75 percent shade over public sidewalks (page 57), existing requirements for bicycle parking (page 51), and existing requirements for Traffic Impact Analyses (Page 57). The Street Transportation Department provided stipulation the following stipulations:
- Stipulation No. 1.e. to require a "complete streets" section be added () that addresses standards that improve convenience and comfort, connectivity, sustainability, and green infrastructure,
 - Stipulation No. 4 to require that the traffic impact analysis report shall be updated with every new development within the PUD,
 - Stipulation No. 5 to require that the traffic analysis report for every new development within the PUD shall include non-automotive enhancements in support of the Complete Streets Ordinance

- Stipulation No. 6 to require that all streets within and adjacent to the development be constructed by the developer to ADA accessibility requirements.
16. The Fire Department commented that the site plan must comply with the Phoenix Fire Code and further indicated there are no problems anticipated with the case. Further, the Department commented that they do not know what the water supply is at this site and noted that additional water supply may be required to meet the required fire flow per the Phoenix Fire Code.

OTHER

17. The site has not been identified as being archaeologically sensitive. However, in the event archaeological materials are encountered during construction, all ground disturbing activities must cease within 33-feet of the discovery and the City of Phoenix Archaeology Office must be notified immediately and allowed time to properly assess the materials. This is addressed in Stipulation No. 2.
18. Staff has not received a completed form for the Waiver of Claims for Diminution in Value of Property under Proposition 207 (A.R.S. 12-1131 et seq.), as required by the rezoning application process. Therefore, a stipulation has been added to require the form be completed and submitted prior to preliminary site plan approval. This is addressed in Stipulation No. 3.
19. Development and use of the site are subject to all applicable codes and ordinances. Zoning approval does not negate other ordinance requirements. Other formal actions such as, but not limited to, zoning adjustments and abandonments may be required.

Findings

1. The request will allow for redevelopment of a large underutilized parcel within the North Mountain Village core that is adjacent to future light rail infrastructure.
2. The proposed development is in conformance with the goals of the North Mountain Redevelopment Area Plan.
3. The proposal is compatible with the existing land use pattern in the area and the General Plan Land Use Map designation.

Stipulations

1. An updated Development Narrative for the Metrocenter PUD reflecting the changes approved through this request shall be submitted to the Planning Department within 30 days of City Council approval of this request. The updated Development Narrative shall be consistent with Hearing Draft date stamped September 1, 2022 as modified by the following stipulations.
 - a. Front Cover: Add "City Council adopted: [Insert Adoption date]."
 - b. Page 48, Section G. Development Standards, Sub-Point 3: Modify the first paragraph to read as follows: "Before any building, project, or use is processed for site plan approval by the City, a shaded and segregated pedestrian circulation plan shall be prepared and incorporated in this PUD as an appendix, and shall detail access to the following where applicable:"
 - c. Page 48, Section G. Development Standards, Sub-Point 4: Modify to read as follows: Individual project site plans shall be required to incorporate or update the Master Trail Plan / Shaded and Segregated Pedestrian Circulation Plan as necessary to provide access to the above, as administratively approved by the Planning and Development Director. Updates to the Master Trail Plan / Shaded and Segregated Pedestrian Circulation Plan shall be submitted to the Planning and Development Department as a "Minor Amendment" to the PUD.
 - d. Appendix: Add the Shaded and Segregated Pedestrian Circulation Plan as an appendix.
 - e. Table of Contents and Page 58: Before the Infrastructure Standards Section add a Complete Streets Section in the PUD. The Complete Streets Section shall specifically address PUD standards that improve convenience and comfort, connectivity, sustainability, and green infrastructure.
2. In the event archaeological materials are encountered during construction, the developer shall immediately cease all ground-disturbing activities within a 33-foot radius of the discovery, notify the City Archaeologist, and allow time for the Archaeology Office to properly assess the materials.
3. Prior to preliminary site plan approval, the landowner shall execute a Proposition 207 waiver of claims form. The waiver shall be recorded with the Maricopa

County Recorder's Office and delivered to the City to be included in the rezoning application file for record.

4. The developer shall submit an updated Traffic Impact Analysis report for every new development within the PUD, or as otherwise approved by the Street Transportation Department. No preliminary approval of plans shall be granted until the study has been reviewed and approved by the City.
5. The developer shall submit a Traffic Impact Analysis report for every new development within the PUD to include non-automotive network enhancements in support of the City's adopted Complete Streets Ordinance, as required by the Street Transportation Department. Non-automotive network enhancements include, but are not limited to, infrastructure improvements for: pedestrian safe crossings, bicycle infrastructure and access to transit facilities. No preliminary approval of plans shall be granted until the study has been reviewed and approved by the City.
6. The developer shall construct all streets within and adjacent to the development with paving, curb, gutter, sidewalk, curb ramps, streetlights, median islands, landscaping and other incidentals, as per plans approved by the Planning and Development Department. All improvements shall comply with all ADA accessibility standards.

Writer

Nick Klimek

September 15, 2022

Team Leader

Racelle Escolar

Exhibits

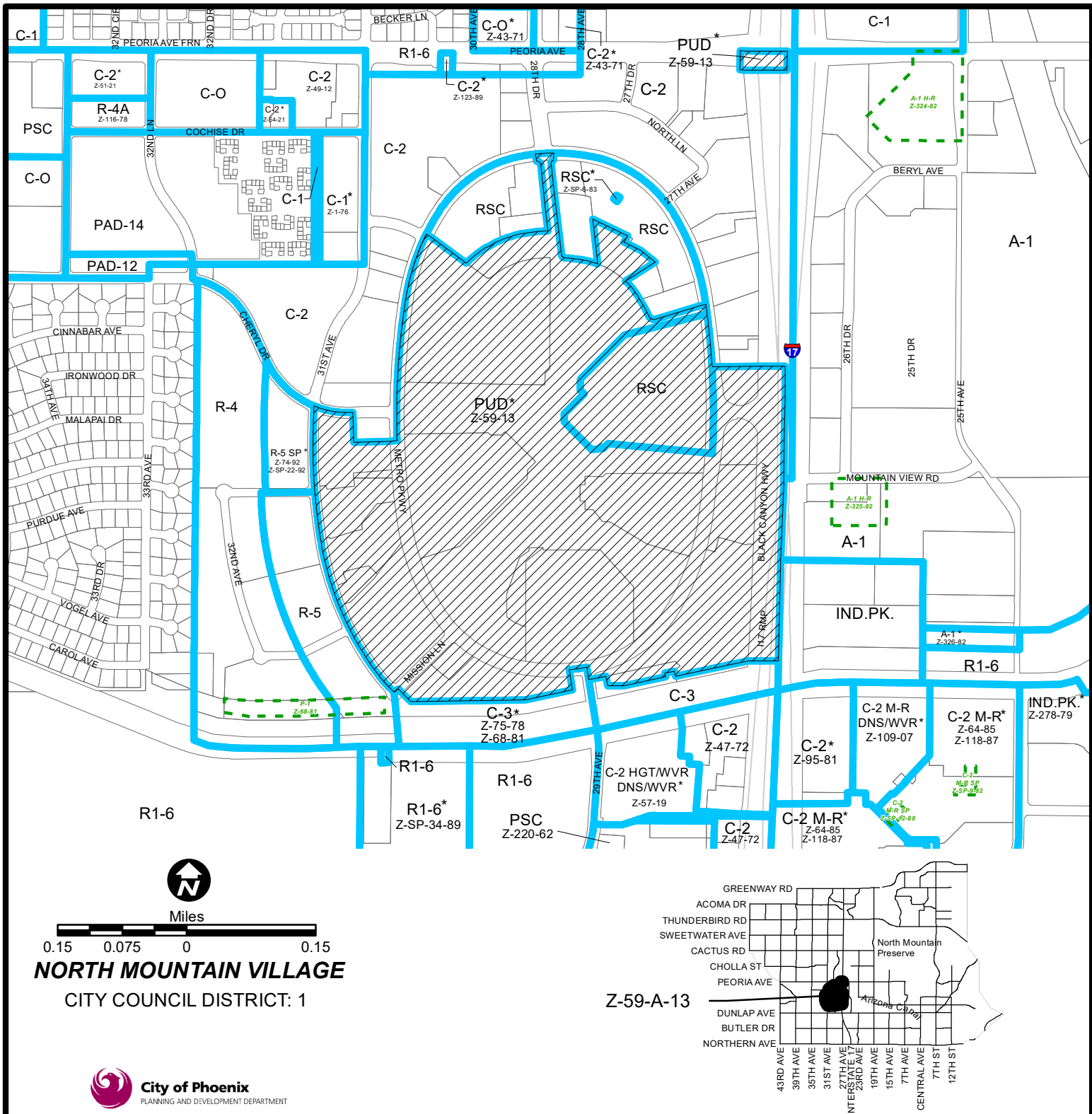
Zoning sketch map

Aerial sketch map

Master Trail Plan No. 190010 (Pedestrian Circulation Plan, signed and dated February 26, 2020) (6 pages)

Community Correspondence (2 pages)

[Metrocenter PUD – Major Amendment A](#) – date stamped September 1, 2022



Z-59-A-13

APPLICANT'S NAME: Steve Sirang, Concord Wilshire Capital

APPLICATION NO. Z-59-A-13

GROSS AREA INCLUDING 1/2 STREET
AND ALLEY DEDICATION IS APPROX.

143.96 Acres

MULTIPLES PERMITTED
PUD, RSC
PUD

DATE: 8/26/22
REVISION DATES:

AERIAL PHOTO &
QUARTER SEC. NO. ZONING MAP
QS 27-22 J-7

CONVENTIONAL OPTION
No Maximum, N/A
No Maximum

REQUESTED CHANGE:

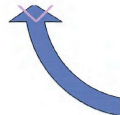
FROM: PUD (130.77 a.c.)
RSC (13.19 a.c.)

TO: PUD (143.96 a.c.)

* UNITS P.R.D. OPTION
N/A, N/A
N/A

* Maximum Units Allowed with P.R.D. Bonus

[illegible]



METRO CENTER PEDESTRIAN SPACE GUIDELINES

- [illegible]

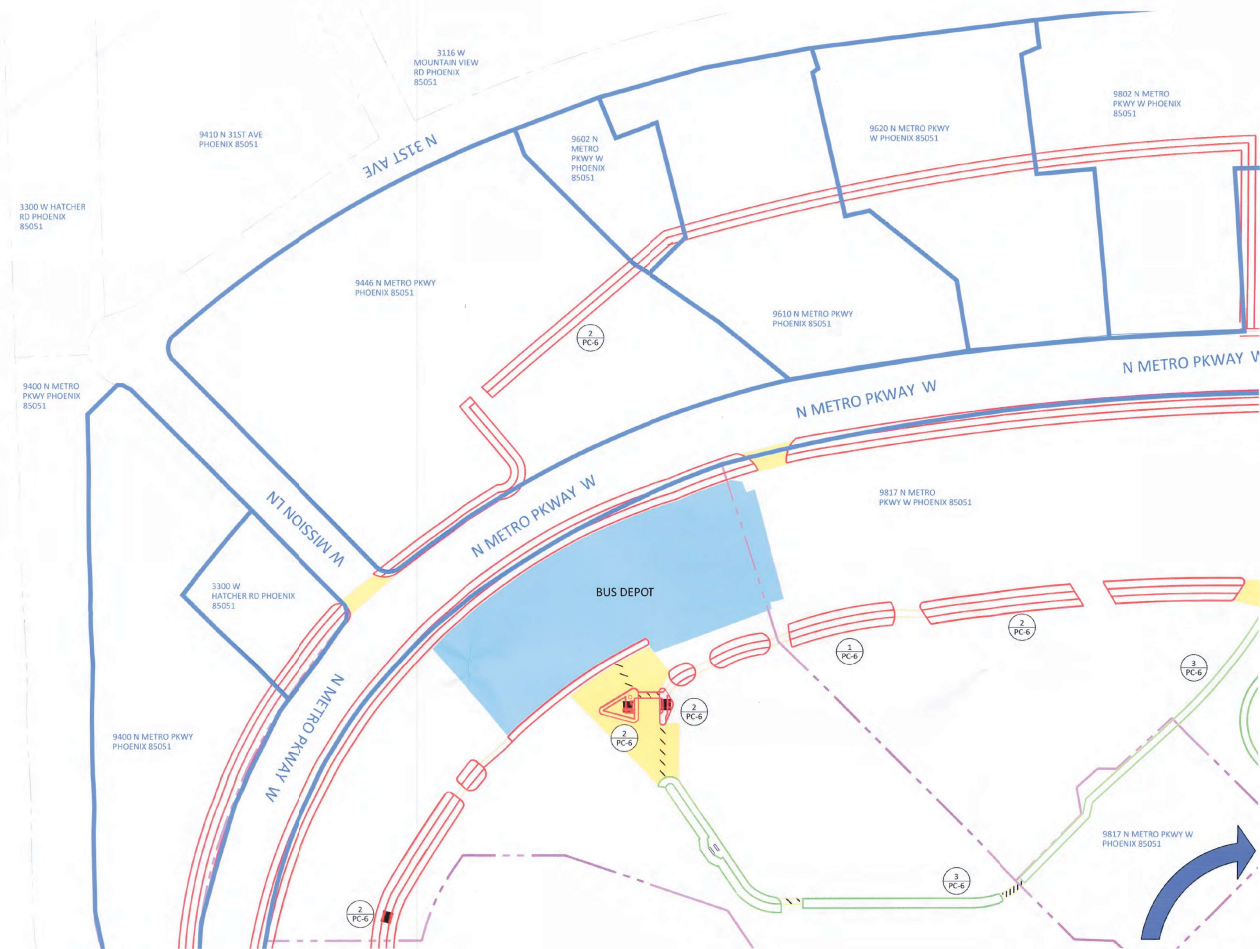
SCALE: NDS



© 2019 RAAA
ARCHITECTS, INC. ALL
RIGHTS RESERVED.
THIS DRAWING IS AN
INSTRUMENT OF
SERVICE. IT IS THE
PROPERTY OF RAAA
ARCHITECTS, INC. AND
MAY NOT BE
DUPLICATED, USED OR
DISCLOSED WITHOUT
WRITTEN PERMISSION
OF THE ARCHITECT

RKAA# 19083.00





ENLARGED SOUTH WEST QUADRANT PLAN

SCALE: NDS



PEDESTRIAN CIRCULATION PLAN

METRO CENTER

DATE: 02-17-2020

© 2019 REAA
ARCHITECTS, INC. ALL
RIGHTS RESERVED.
THIS DRAWING IS AN
INSTRUMENT OF
SERVICE. IT IS THE
PROPERTY OF REAA
ARCHITECTS, INC. AND
MAY NOT BE
DUPLICATED, USED OR
DISCLOSED WITHOUT
WRITTEN PERMISSION
OF THE ARCHITECT.

PC-4
ENLARGED
SOUTH WEST

RCAA# 19083.00



[illegible]

SCALE: NDS

DATE: 02-17-2020

DATE: 02-17-2020

DATE: 02-17-2020

PC-5
ENLARGED
NORTH WEST
RKA# 19083





1 PRIMARY WALKWAY WITH NATURAL SHADE
SCALE: 1/4" = 1'-0"

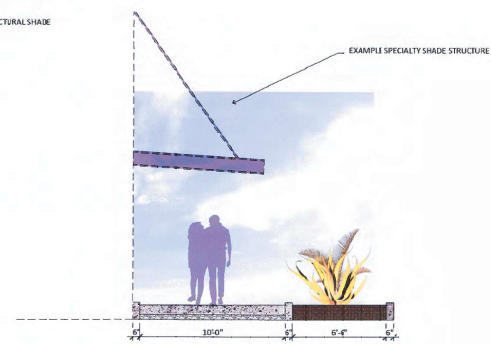
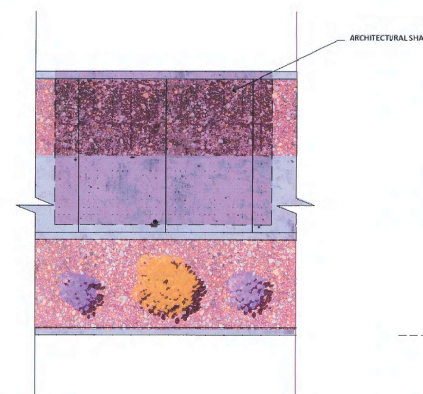
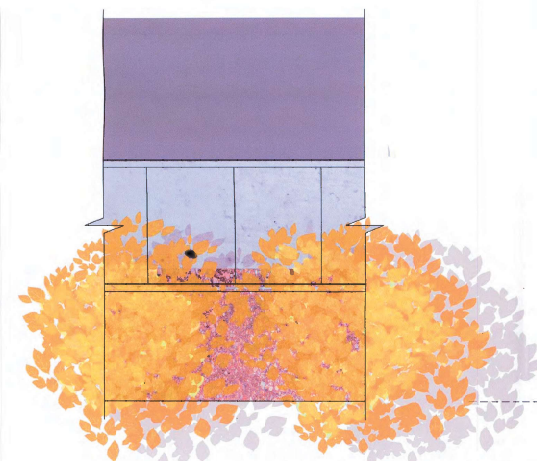
2 PRIMARY WALKWAY WITH ARCHITECTURAL SHADE
SCALE: 1/4" = 1'-0"

SECONDARY NOTES

AROUND THE PERIMETER OF THE EXISTING MALL FOOTPRINT
EXISTING CONDITIONS, INAPPROPRIATE FOR NAVIGATING
PARKING LOTS.

ENHANCED CROSSINGS

- ENHANCED CROSSINGS LIST OF TREATMENTS:
- A. PEDESTRIAN ACTIVATED TRAFFIC SIGNALS (SUCH AS SIGNAL MEETS NATIONAL STANDARDS) ± 14
 - B. A PEDESTRIAN CYCLIST SAFETY ISLAND WITHIN THE MIDDLE OF THE ROAD RIGHT OF WAY ± 8
 - C. CLEARLY MARKED CROSSWALK WITH MOTORIST WARNING SIGNS ± 8
 - D. VEHICULAR WARNING STRIPS TO WARN OF PEDESTRIAN CROSSING ± 8
 - E. CURB RAMPS ± 8
 - F. STREET REGENERATION AND SAFE CROSSING METHOD SIGNS ± 8



3 SECONDARY WALKWAY WITH NATURAL SHADE
SCALE: 1/4" = 1'-0"

4 SECONDARY WALKWAY WITH ARCHITECTURAL SHADE
SCALE: 1/4" = 1'-0"

PEDESTRIAN CIRCULATION PLAN

METRO CENTER

DATE: 02-18-2020

© 2020 RKA
ARCHITECTS, INC. ALL
RIGHTS RESERVED.
THIS DRAWING IS AN
INSTRUMENT OF
SERVICE AND NOT
THE PROPERTY OF RKA
ARCHITECTS, INC. AND
IT IS TO BE USED ONLY
FOR THE PROJECT AND
LOCATION SPECIFICALLY
IDENTIFIED HEREON.
WRITTEN PERMISSION
OF THE ARCHITECT

PC-6
SECTIONS

RKAA# 19083.00

RKAA
ARCHITECTS, INC.

From: [George Brimhall](#)
To: [Nick Klimek](#)
Subject: METRO CENTER EXPANSION
Date: Thursday, August 25, 2022 10:28:41 PM

From: Castles N' Coasters, Inc.

9445 Metro Pkwy E.

Phoenix, AZ 85051

To: City of Phoenix Planning and Development Dept.

200 West Washington Street ~ 2nd Floor

Phoenix, AZ 85003

Date: August 25, 2022

Re: Case No. n.a. Metrocenter PUD Amended PUD, Z-59-A-13-1

I am the President of Castles N' Coasters, Inc. the builder, operator and owner of Castles N' Coasters. We opened this facility over 45 years ago and have the reputation of operating one of the finest FEC's in the country. Cleanliness, service and fair pricing along with a fun mixture of rides, golf and food make us an enjoyable outing for all.

To follow are some of the concerns that we have with the City and Mall Owners lack of insight to facilitate the closure of one of Phoenix's landmark sites. The downgrade of parkway aesthetics and adequate policing of undesirable clientele, were in our opinion, a primary factor in Metro's closure.

1. The construction of the new rapid transit terminal at Metro Center along with the vacating of mall tenants and its final closing have been a disaster for this area. No one including The City of Phoenix will assume any responsibility for maintaining a respectable construction site and much needed road and landscaping repairs. Mall management has turned a deaf ear to us as well. If we cannot get the City's support in addressing the construction environment of the light rail expansion what are the odds of getting their help with the problems created with a five year plus development. A lengthy project of this nature can very well devastate our park with dust, dirt, noise, road closures and congestion including maintenance of heavy equipment and their damage to the parkway.

We appreciate that any development on this property will produce many of these concerns. We are asking that as a condition of development ongoing maintenance to the parkway, including roads, sidewalks and landscape be required.

2. We feel that screening of the construction site by a solid fence at ground level is mandatory to limit the amount of dust, reduce the noise and help to enhance the beautification of this area...all which are essential for us and other adjacent businesses to attract the public to our facilities.

3. We feel that access to the construction project should be limited on the Parkway and accommodations should be made on the construction site, inside the fence, for construction equipment to access the various areas of construction. The construction materials, equipment, traffic, noise, etc...will be devastating to our facility if binding guidelines are not established by The City to minimize these concerns.

4. Twenty Eight Hundred living units and just short of 400,000 feet of retail within an 1/8 of a mile of one's business has to make an impact on traffic. Will any improvements be made to minimize this

impact? Is the parking proposed for this project more than adequate to meet their expansive needs?

5. In maintaining a family oriented facility we allow the public to freely visit our park without paying an admission. Our arcade is a viable part of our park and charging admission for our arcade clientele would rapidly reduce our revenue stream. Unfortunately, with 2800 units across the street from us we will be a drop off location for all kids from 8 to 18 after school and on weekends. The majority of these kids will not be spending money, will familiarize themselves with all aspects of our park and will create a policing nightmare and unsightly environment. We do not have a solution for this concern and your suggestions and incite would certainly be appreciated.

Selfish as it may sound, we believe that we are a viable part of this community and hope that the City of Phoenix feels the same. Please give serious thought to these concerns when approving this project. Your requirements will very well determine our future in Phoenix.

Sincerely,
Castles N' Coasters, Inc.

George H. Brimhall, Pres.

Cc: Nick Klimek @ ~ nick.klimek@phoenix.gov