City of Phoenix
PLANNING AND DEVELOPMENT DEPARTMENT

Staff Report Z-SP-4-26-7
November 6, 2026
***REVISED**

Central City Village Planning Committee Meeting Date:	November 9, 2026
Planning Commission Hearing Date:	December 3, 2026
Request From:	A-1 SP CMOD MH (Light Industrial District, Special Permit, Capitol Mall Overlay District, Middle Housing Overlay District) (12.83 acres) and A-1 CMOD MH (Light Industrial District, Capitol Mall Overlay District, Middle Housing Overlay District) (1.88 acres)
Request To:	A-1 SP CMOD MH (Light Industrial District, Special Permit, Capitol Mall Overlay District, Middle Housing Overlay District) (14.71 acres)
Proposed Use:	Special permit for a homeless shelter, charitable dining hall, and food service uses.
Location:	Southwest corner of 9th Avenue and Jackson Street
Owner:	Human Services Campus Inc. and Saint Vincent de Paul Society
Applicant:	Andy Jochums, Gilbert Blilie, PLLC
Representative:	Paul Gilbert, Beus Gilbert Blilie, PLLC
Staff Recommendation:	Approval, subject to stipulations

General Plan Conformity	
General Plan Land Use Map Designation	Industrial and Public/Quasi-Public

Street Map Classification	Madison Street	Local	35-foot south half street
	12th Avenue	Local	31-foot west half street
	11th Avenue	Local	45-foot west half street
	Jackson Street	Local	33-foot south half street
	9th Avenue	Local	45-foot west half street
	Harrison Street	Local	60-foot full street (abutting perpendicular)

CELEBRATE OUR DIVERSE COMMUNITIES AND NEIGHBORHOODS CORE VALUE; CERTAINTY AND CHARACTER; DESIGN PRINCIPLE: Create or maintain spacing requirements for small-scale incompatible land uses such as adult businesses, homeless shelters, residential treatment facilities and other group facilities, to avoid concentrations that change the character of the area.

While the total on-site capacity will remain unchanged, the proposal is to allow for the future conversion of temporary beds to permanent beds within existing buildings. It also permits future development on the vacant portion of the site, while maintaining all existing setbacks and separation between existing uses.

CELEBRATE OUR DIVERSE COMMUNITIES AND NEIGHBORHOODS CORE VALUE; CERTAINTY AND CHARACTER; LAND USE PRINCIPLE: New development and expansion or redevelopment of existing development in or near residential areas should be compatible with existing uses and consistent with adopted plans.

The proposal is consistent with the existing use on site and is an allowable use within the Capitol Mall Overlay District when approved through a Special Permit.

CELEBRATE OUR DIVERSE COMMUNITY CORE VALUE; CLEAN NEIGHBORHOODS; LAND USE PRINCIPLE: Support new compatible land uses that remove extremely deteriorated structures, excessive trash and debris, and other blight in neighborhoods.

As stipulated, the proposal includes additional trash and recycling receptacles and requires scheduled clean-ups of the surrounding area.

pplicable Plans, Overlays, and Initiatives
Capitol Mall Overlay District: See Background Item No. 3 below.
Governmental Mall Master Plan: See Background Item No. 4 below.
Middle Housing Overlay District: See Background Item No. 5 below.
Strategies to Address Homelessness: See Background Item No. 13 below.
Complete Streets Guidelines: See Background Item No. 14 below.
Zero Waste PHX: See Background Item No. 15 below.

Surrounding Land Uses/Zoning		
	Land Use	**Zoning**
On Site	Homeless shelter, charitable dining hall and food service uses	A-1 SP CMOD MH, A-1 CMOD MH
North	Parking lot, warehouse storage, industrial uses, community services, and vacant lots	A-1 CMOD MH, A-1 SP CMOD MH
South	Railroad tracks	A-1 CCSIOD MH, A-2 CCSIOD MH
East	Vehicle storage and industrial uses	A-1 CMOD MH
West	Cemetery	A-1 HP-L CMOD MH, C-3 HP-L CMOD MH

Background/Issues/Analysis

SUBJECT SITE AND HISTORY

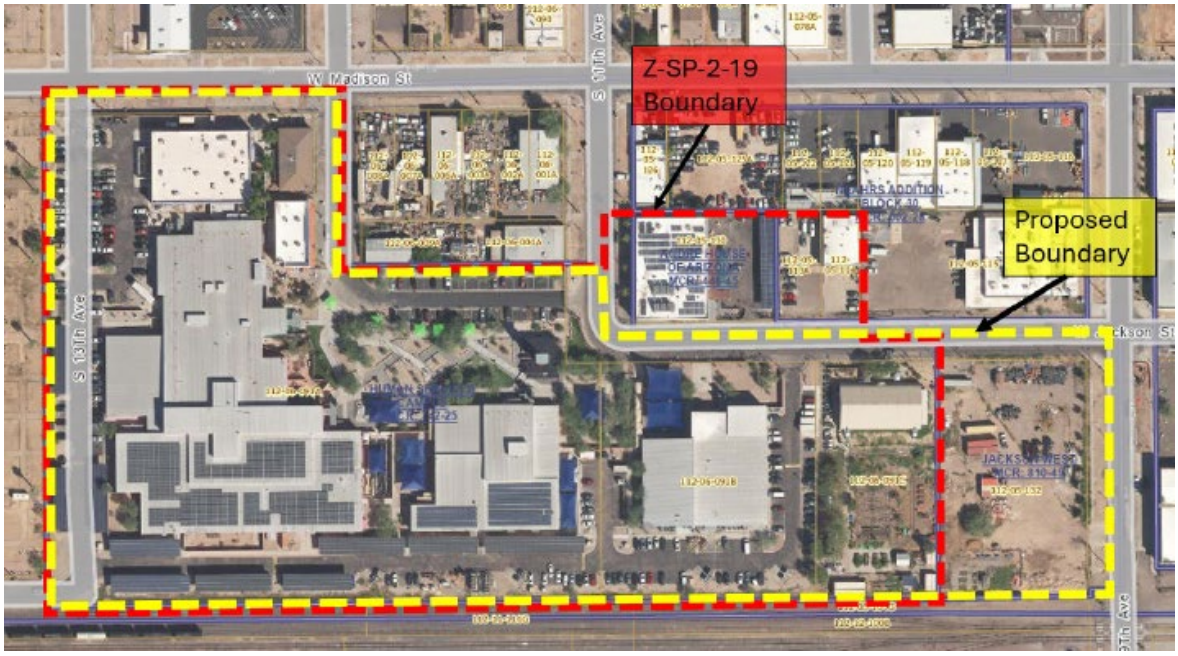
1. This request is to modify the Special Permit area of the Keys to Change Campus for approximately 14.71 acres located at the southwest corner of 9th Avenue and Jackson Street and rezone the subject site from 12.83 acres of A-1 SP CMOD MH (Light Industrial District, Special Permit, Capitol Mall Overlay District, Middle Housing Overlay District) and 1.88 acres of A-1 CMOD MH (Light Industrial District, Capitol Mall Overlay District, Middle Housing Overlay District) to A-1 SP CMOD MH (Light Industrial District, Special Permit, Capitol Mall Overlay District, Middle Housing Overlay District). The proposal is to allow for the future conversion of temporary beds to permanent beds without increasing the site's overall capacity, remove the Andre House (located at the northeast corner of 11th Avenue and Jackson Street) from the new Special Permit area and add a vacant parcel located at the southwest corner of 9th Avenue and Jackson Street. The vacant parcel may accommodate any future building or buildings to house shelter beds; however, no new construction is proposed at this time.

Keys to Change facilitates coordination among 13 independent nonprofit and governmental agencies that provide a range of services to individuals experiencing, or at risk of experiencing homelessness. The subject site, referred to as the Keys to Change Campus (Key Campus), serves more than 1,000 people daily. Services provided on the Key Campus include reunification with family and friends; mental, physical, and dental healthcare; shelter services; mail services; employment services; meals; legal services; housing navigation and match assistance; animal care, case management; and additional supportive services.

2. In 2003, Special Permit Z-SP-21-02-8 was approved to allow temporary shelter, charitable dining hall, and food service uses on approximately 12.55 acres generally bounded by 242 feet west of the southwest corner 9th Avenue and Jackson Street, south to Harrison Street, west to 13th Avenue, and north to Madison Street, which encompasses the existing shelter area.

   In 2021, Special Permit Z-SP-2-19-7 was approved to increase the number of allowable beds to 700 and incorporate the Andre House.

   In 2024, Planning Hearing Officer case PHO-1-23--Z-SP-2-19-7 was approved to modify the stipulations of Z-SP-2-19-7 and served as the review process for the Special Permit, as required by a stipulation.



Boundary Map; Source: Beus Gilbert, PLLC

CAPITOL MALL OVERLAY DISTRICT

3. The subject site is within the Capitol Mall Overlay District. The Capitol Mall Overlay District acknowledges the varied uses of the area, including governmental offices, industrial and commercial businesses, and historic residences. Many of these activities are located in close proximity to one another, and the compatibility of such uses is critical to their property and orderly function. The purpose of this district is to prevent a concentration of certain uses that could restrict businesses and residences from functioning normally and contribute to the deterioration of the business and living environment, the downgrading of property values, and the diminishment of health, safety and general welfare conditions in the area. The Capitol Mall Overlay District permits homeless shelters and charitable dining subject to a Special Permit. Further, pursuant to A.R.S 34-225 and A.R.S 41-1362, the Arizona Department of Administration (ADOA) approved this request on September 21, 2026. A copy of the approval letter is included as an exhibit to this report.



Source: City of Phoenix Planning and Development Department

GOVERNMENTAL MALL MASTER PLAN

4. The subject site falls within the boundaries of the Government Mall Master Plan area, as defined by state law. Arizona Revised Statutes A.R.S 41-1362 provides the ADOA with authority over the planning, growth, and development of the Governmental Mall area. Prior to approval of any rezoning or Special Permit by the City of Phoenix, the ADOA

must first issue a letter approving the request. Accordingly, the ADOA General Services Division approved this Special Permit request on September 21, 2026.

The proposal is consistent with the Social Services land use designation identified in the Land Use Plan for the area.



Government Mall Land Use Plan; Source: Government Mall Master Plan

Additionally, the plan recommends the incorporation of crime prevention measures. Staff recommends Stipulation Nos. 9 through 12 to address concerns regarding security and safety around and within the subject site.

MIDDLE HOUSING OVERLAY DISTRICT

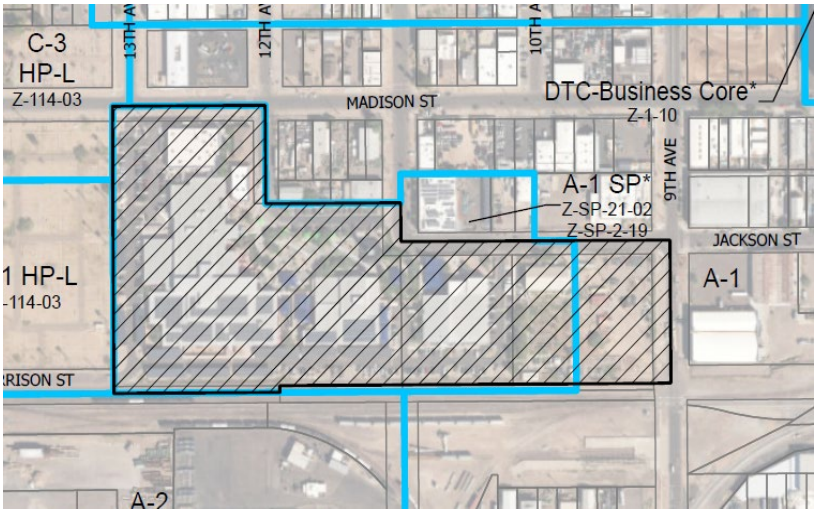
5. In November 2025, the Phoenix City Council approved the Middle Housing (MH) Overlay District pursuant to A.R.S. 9-462.13. The MH Overlay District permits the

development of middle housing on lots zoned for single-family use and applies to properties located within one mile of Downtown Phoenix. The district has two primary purposes: to allow up to four primary dwelling units (PDUs) on lots otherwise permitted for a single-family residence, and to ensure that development standards remain consistent with those applicable to single-family homes within the same zoning district.

The subject request does not include residential uses. Therefore, the provisions of the Middle Housing Overlay District are not applicable to this proposal.

SURROUNDING LAND USES AND ZONING

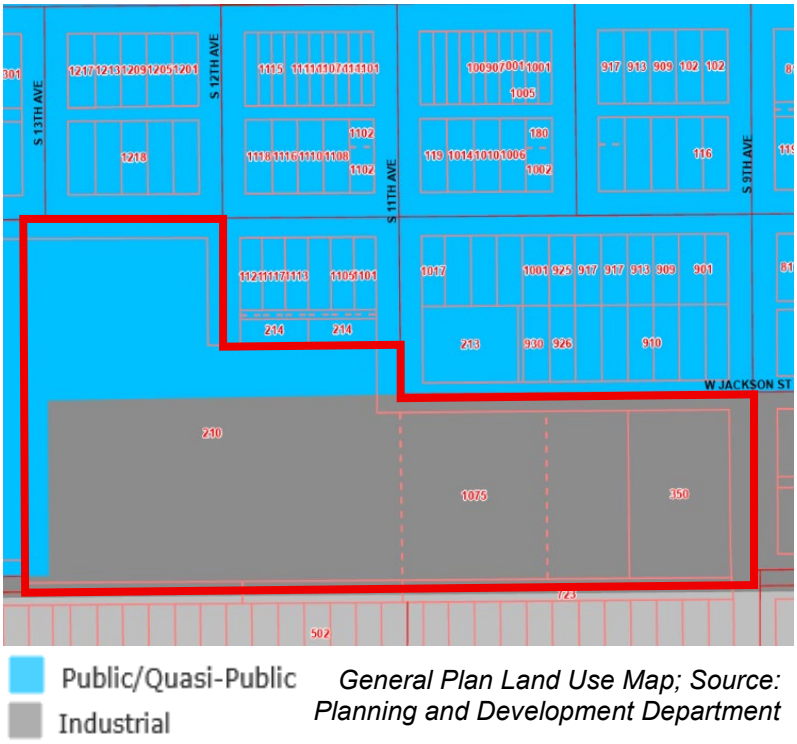
6. To the south, zoned A-2 CCSIOD MH and A-1 CCSIOD MH, are railroad tracks and beyond the railroad right-of-way are properties used for industrial and trucking uses. To the west, zoned A-1 HP-L CMOD MH and C-3 HP-L CMOD MH, is the Pioneer and Military Memorial Park (cemetery). To the north is a charity organization zoned A-1 SP CMOD MH, as well as a parking lot, offices, warehouse storage, industrial uses, community services, and vacant lots zoned A-1 CMOD MH. To the east are vehicle storage and industrial uses also zoned A-1 CMOD MH.



Location Map; Source: Planning and Development Department

GENERAL PLAN LAND USE MAP DESIGNATIONS

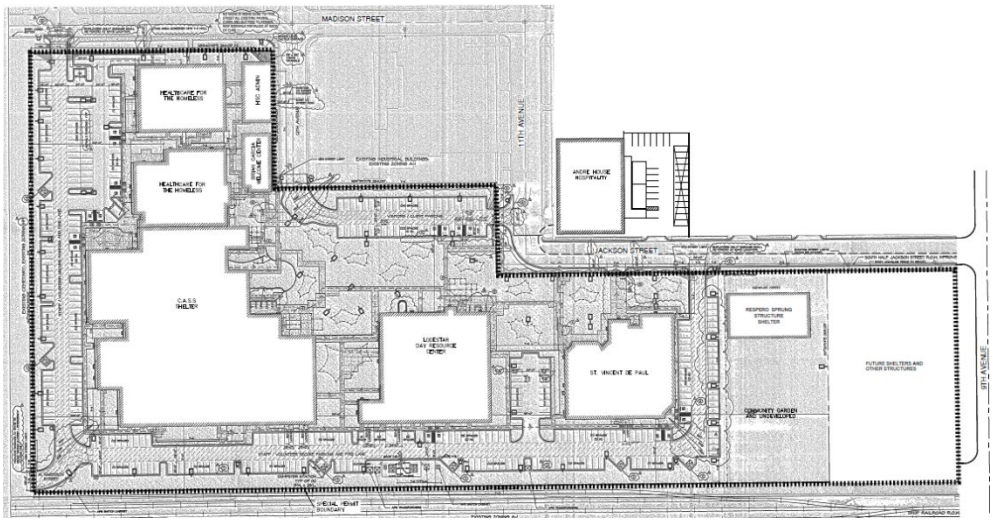
7. The General Plan Land Use Map designations for the site are Public/Quasi-Public and Industrial. The Industrial land use category allows warehousing, manufacturing and processing businesses. The Public/Quasi-Public land use category identifies areas where institutional, cemetery, governmental, utility and airport uses are appropriate. The proposal is consistent with these land use designations as it continues to provide services and shelter to individuals experiencing homelessness.



General Plan Land Use Map; Source: Planning and Development Department

PROPOSAL AND ANNUAL REVIEW

8. The proposal is to allow for the future conversion of temporary beds to permanent beds without increasing the site's overall capacity, remove the Andre House from the new Special Permit area, and add vacant land to the new Special Permit area for a possible expansion of the facility. Stipulation No. 1 requires the development to be in general conformance with the site plan date stamped May 1, 2026. Any request to delete or modify stipulations is subject to review by the Planning Hearing Officer, and a public hearing pursuant to the guidelines listed in Section 506 of the Phoenix Zoning Ordinance. While no new construction or buildings are proposed at



Conceptual Site Plan; Source: Bowman Consulting

this time, Stipulation No. 1 would require a public hearing process for any significant changes to the existing campus layout.

Further, to provide information on the effectiveness of the Special Permit, Stipulation No.15 requires that an annual report be provided detailing the number of people served by service providers; the number of positive exits for each organization; the number of beds, if permitted, allocated to entities other than the City of Phoenix; summaries of community outreach meetings; and efforts to address homelessness on a regional level.

Stipulation No. 16 requires the Special Permit to be reviewed two years after Council approval of the Special Permit. The review is conducted by the Planning Hearing Officer, who may impose additional stipulations as necessary.

Stipulation No. 23 requires that Keys to Change shall not own another low barrier shelters with 1.5 miles of the subject site.

Stipulation No. 25 states that the Special Permit may be revoked by the City Council if the subject site is found to be in noncompliance with conditions of the Special Permit or site plan approval, or if the uses are creating safety hazards to the surrounding area.

BED ALLOCATION AND OPERATIONS

9. Stipulation No. 2 outlines the maximum number of beds permitted under the request. Further, Stipulation No. 2.b requires that the shelter operate 24 hours a day, 365 days a year; that the shelter only serves adults ages 18 and older; and that services be delivered using a trauma informed care model. Stipulation No. 2.c outlines the current model of services and Stipulation No. 2.d outlines minimum barriers to entry for the shelters. To address concerns regarding the immediate needs of individuals experiencing homelessness in the nearby area and within the City of Phoenix. Stipulation No. 2.e. prohibits shelter operators from reserving or contracting bed spaces unless approved by the Planning and Development Director or the Police Chief, excluding 14 bed spaces reserved for hospital drop-offs.

   To ensure the subject site is maintained in a clean and sanitary condition, Stipulation Nos. 3 and 4 require that trash and recycling receptacles be provided on site and that a minimum of two permanent toilet facilities be accessible to the public between 7:00 a.m. and 11:00 p.m.

   Stipulation No. 6 requires shelter operators with vacancies accept clients until 11:00 p.m., which would allow additional individuals to be admitted into the shelter facilities.

   Stipulation No. 7 reserves shelter beds to accommodate emergencies, police needs, or other special situations. Additionally, Stipulation No. 8 mandates that a minimum of 20 shelter beds be reserved for the Police Department’s use when they encounter individuals in need of shelter.

IMPACT ON SURROUDING AREA

10. Stipulation Nos. 5, 24, 26, 27, and 28 address the Key Campus' impact on the surrounding area. Stipulation No. 5 requires that sidewalks and streets be cleaned a minimum of twice per day within the area bounded by 7th Avenue and 15th Avenue, between Madison Street and Harrison Street, as well as the area between 11th Avenue to 12th Avenue, from Jefferson Street to Madison Street. Stipulation No. 24 requires that designated waiting areas be provided for individuals seeking services to prevent congregating within the public rights-of-way. Stipulation No. 26 requires that all meals be provided within the Special Permit area. Stipulation No. 27 requires that service providers discourage individuals experiencing homelessness from occupying public rights-of-way through sign postings, security patrols, and other communication methods. Stipulation No. 28 requires that signage be posted along the perimeter of the subject site discouraging street feeding and distribution of materials within public rights-of-way.

SECURITY

11. Stipulation Nos. 9 through 12 address concerns regarding security and safety around and within the subject site. Stipulation No. 9 requires that an "authority to arrest" agreement be completed and maintained for all property owners and operators within the Special Permit area, allowing the Police Department to patrol the area and arrest trespassers. Stipulation No. 10 requires security personnel on site daily, and Stipulation No. 11 requires security cameras or other monitoring devices be provided to capture activity along street frontages. Stipulation No. 12 requires a Security Master Plan to be provided and reviewed by the Police Department. The plan must address topics such as a primary point of contact for all security matters, coordination of security personnel, provisions for cameras and lighting, procedures for disposing of controlled substances and weapons, and procedures for screening and monitoring clients.

COMMUNITY OUTREACH

12. To reduce the impacts of those experiencing homelessness in the surrounding area, Stipulation Nos. 14.a through 14.f outline community outreach requirements, including notification of surrounding property owners and neighborhood associations, the frequency of outreach meetings, the topics discussed at outreach meetings, and summaries that must be submitted to the Planning and Development Department.

STUDIES AND POLICIES

13. **Strategies to Address Homelessness**
    In June 2020, the City of Phoenix released the Strategies to Address Homelessness plan focusing on strategies for persons experiencing homelessness as well as developing best practices to mitigate impacts to surrounding communities and neighborhoods. The plan notes a chronic shortage of shelter beds and identifies the goal of providing adequate shelter space to meet the needs of unsheltered individuals.

Stipulation No. 13 requires the Key Campus to identify, pursue and implement strategies that reduce service demands on providers within and near the subject site. These efforts must be summarized in an annual report provided to the Office of Homeless Solutions and the Planning and Development Department. Additionally, Stipulation No. 29 requires that, within 60 days of the Special Permit approval, Keys to Change review and update their written plan outlining how they will support the City's adopted strategies to address homelessness and provide a copy of the updated plan to the Planning and Development Department for review.

14. **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. Stipulation Nos. 3 through 5, 24, and 26 through 28 address street maintenance and the reduction of individuals congregating to provide clean and safe streets for bicyclists and pedestrians. Additionally, Stipulation No. 17 requires that the developer construct all improvements in the right-of-way with all required elements and to ADA standards.

15. **Zero Waste PHX**
The City of Phoenix is committed to its waste diversion efforts and has set a goal to become a zero waste city, as part of the city's overall 2050 Environmental Sustainability Goals. One of the ways Phoenix can achieve this is to improve and expand its recycling and other waste diversion programs.

Section 716 of the Phoenix Zoning Ordinance establishes standards to encourage the provision of recycling containers for multifamily, commercial, and mixed-use developments meeting certain criteria. Stipulation No. 3 addresses the provision of trash and recycling facilities accessible to the public to reduce waste in the public rights-of-way.

COMMUNITY CORRESONDENCE

16. As of the writing of this report, staff has received six letters in opposition to this request citing concerns regarding the use of temporary beds outside of weather-related emergencies, public safety and crime rates, sanitation and neighborhood conditions, neighborhood nuisance impacts, concentration of shelter and related services in the area, consistency with the City's Strategies to Address Homelessness plan, compliance with existing Special Permit conditions, the effectiveness of current mitigation measures, perimeter management and pedestrian safety, impacts on emergency and public services, the lack of demonstrated outcomes supporting additional capacity, and the need for a more equitable regional distribution of shelter and housing resources.

INTERDEPARTMENTAL COMMENTS

The stipulations of this Special Permit were adapted from the previous Special Permit and Planning Hearing Officer cases, which were developed through coordination with multiple city departments. The stipulations established during the previous cases have been updated based on relevance to the subject site and on the interdepartmental comments outlined below.

17. The Office of Homelessness Solutions requested that Stipulation No. 28 be added to require signage discouraging street feeding and material distribution and that Stipulation No. 14 be modified to include specific examples of how outreach and bed availability may be prioritized for individuals in the immediate area.

18. The City of Phoenix Aviation Department requires that the property owner record a Notice to Prospective Purchasers of Proximity to Airport in order to disclose the existence, and operational characteristics of the Phoenix Sky Harbor Airport to future owners or tenants of the property. This is addressed in Stipulation No. 18.

OTHER

19. The Arizona Department of Administration approved of this request on September 21, 2026 pursuant to A.R.S. 34-225 and A.R.S. 41-1362. A copy of the approval letter is included as an exhibit to this report.

20. The site is located in a larger area identified as being archaeologically sensitive. If further review by the City of Phoenix Archaeology Office determines the site and immediate area to be archaeologically sensitive, and if no previous archaeological projects have been conducted within this project area, it is recommended that archaeological Phase I data testing of this area be conducted. Phase II archaeological data recovery excavations may be necessary based upon the results of the testing. A qualified archaeologist must make this determination in consultation with the City of Phoenix Archaeologist. In the event archaeological materials are encountered during construction, all ground disturbing activities must cease within a 33-foot radius 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 Nos. 19 through 21.

21. Stipulation No. 22 requires a Proposition 207 waiver of claims form to be executed by property owners within the Special Permit area. This is a waiver of rights for the property owners to make any claim for diminution in value pursuant to A.R.S. 12-1134 as a result of the City’s action on this request.

22. Development and use of the site is 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. As stipulated, the request requires the Key Campus to address safety and cleanliness of the surrounding area.

2. As stipulated, the proposal will facilitate community outreach efforts to address impacts to the surrounding community and regional strategies to reduce homelessness.

Stipulations

1. The development shall be in general conformance to the site plan date stamped May 1, 2026, as modified by the following stipulations and approved by the Planning and Development Department.

*2. ~~**Permanent**~~ Shelter Beds
A maximum of 900 beds shall be permitted.

   a. No low barrier shelter services (defined as servicing those individuals with prior sex offense convictions, those actively utilizing drugs and/or those with weapons in their possession) **provided at Central Arizona Shelter Services ("CASS")**. In addition, no services shall be provided that are not part of the standard ~~**Central Arizona Shelter Services ("CASS")**~~ **CASS** operates at today, as outlined below, with the exception of people with pets and service animals under the discretion of the Keys to Change Campus (Key Campus) or service provider/s.

   b. The shelter operators that operate within the subject site shall serve adults ages 18 and older, operate 24/7, 365 days a year, and deliver services in a trauma informed care model.

   c. All of the following are part of the current model of services:
      - 24/7 temporary emergency shelter.
      - 24/7 security.
      - Case management services are available to all individuals at the Key Campus, whether in a shelter or not.
      - Clients with mental health and behavioral health issues are offered intensive case management, and the case managers also coordinate with other providers to help meet the client's mental health needs.

- Indoor programming for people who remain at the shelter during the daytime. Note: all clients can utilize the case management services during the daytime, even if they are not allowed to stay indoors all day.
- Housing support and resources, including rapid rehousing and short-term financial assistance.
- Supports clients to have all their needs met, with an integrated model of collaboration and care with partners both on and off the Key Campus.
- Participates in coordinated entry and all client information is entered into the HMIS system.

d. The shelter operators shall have minimum barriers to enter the adult shelters:
   - Clients do not need to be clean or sober, but they may not bring drugs or alcohol into the shelter.
   - Clients do not have to have an income.
   - Clients do not have to accept services; however, service engagement is core to the model and clients are encouraged to enroll in case management.
   - Clients do not have to have identification, other than a campus identification.
   - No weapons are allowed in the shelter and clients go through a metal detector.

e. The shelter operators shall not enter into contract to sell or reserve bed space unless:

   i. The Planning and Development Department Director determines, in his or her sole discretion, that the agreement will significantly reduce the homeless population within a 10-mile radius of the site; or

   ii. The Police Chief determines, in his or her sole discretion, that the agreement will not reduce the accessibility of homeless shelter space within a 10-mile radius of the site.

   iii. This excludes a maximum of 14 beds utilized for hospital drop off from hospitals located within a 10-mile radius which are needed in situations where a former hospital patient is in need of short-term bed rest and would otherwise be dropped off on the street without a place to stay.

3. Trash/recycling receptacles shall be provided within the property boundaries of the Special Permit area and accessible to the public 7:00 a.m. to 11:00 p.m. The

Key Campus shall comply with the waste receptacle plan reviewed July 15, 2021 that demonstrates sufficient quantities and locations of receptacles located within Special Permit area, or as otherwise approved by the Planning and Development Department and the Public Works Department.

4. A minimum of two permanently constructed toilet facilities connected to the city's water and sewer systems, accessible to the public from 7:00 a.m. to 11:00 p.m., shall be provided within the Special Permit Area. The toilet facilities shall be fully accessible (ADA compliant). Directional signs shall be provided to identify the location(s). The toilet facilities shall comply with the Phoenix Building Construction Code and shall be approved and permitted by the Planning and Development Department.

5. Property owners and operators within the Special Permit area shall maintain all public rights-of-way including sidewalks, alleys, easements and streets from any hazards or accumulation of garbage, debris, rubble, hazardous waste, litter, rubbish, refuse, waste material, or blight within the following boundaries around the Special Permit area from 7th Avenue to 15th Avenue, between Madison Street to Harrison Street, and the areas from 11th Avenue to 12th Avenue, between Jefferson Street to Madison Street. This area will be cleaned a minimum of twice a day, seven days a week (in the morning after breakfast is served, prior to 10:00 a.m.; and in the evening after dinner is served, prior to 8:00 p.m.). Cleaned shall be defined as removal of any trash, waste, debris or other objects, liquids or hazards.

6. At a minimum, all temporary shelter facilities with vacancies, shall be open and accepting temporary shelter clients until 11:00 p.m.

7. The providers of shelter beds shall exercise best efforts to always maintain up to five percent excess bed capacity until 4:00 p.m. so as to accommodate emergencies, police needs or special situations in which available bed. Capacity needs to be held in reserve for the good of the public or the individual.

    a. The total beds for the purpose of calculating the five percent excess bed capacity, excludes a maximum of 20 beds utilized for hospital drop off from hospitals located within a 10-mile radius which are needed in situations where a former hospital patient is in need of short-term bed rest and would otherwise be dropped off on the street without a place to stay.

    b. The total beds for the purpose of calculating the five percent excess bed capacity, excludes other special medical or mental health beds which are needed in situations where critical health or crisis needs must be accommodated for the benefit of the individual or the community at large.

*8. A minimum of 20 beds shall be reserved until 11:00 p.m. each night for emergency use by the Police Department. This is in addition to the best efforts as required in Stipulation No. **7 ~~8~~.**

9. An “authority to arrest” agreement shall be completed and maintained for all property owners and organizations operating within the Special Permit area. The agreements shall be signed and delivered to the Phoenix Police Department.

10. Security, certified by the Department of Public Safety, shall be on the site daily to ensure the security of the site, and coordinate with the Phoenix Police Department for criminal activity or crime related issues.

11. Security cameras (or other monitoring devices, as approved by the Police Department) shall be provided, in perpetuity, to continually capture images of activities along the street frontages. Videos/Images shall be preserved for a minimum of 90 days. Property owners within the Special Permit area shall enroll in the City’s Virtual Block Watch Program.

12. A Security Master Plan shall be submitted to the Phoenix Police Department for review and recommendations, to ensure a safe environment and coordination with the Police Department. The Security Master Plan shall be updated when necessary per the Police Department. The plan shall include, at minimum, the following elements:

    a. A central point of contact for security matters.

    b. Coordination of security personnel with the Police Department.

    c. Required number of security personnel.

    d. Provisions for security cameras and lighting.

    e. Procedures for storing and handling the disposal of controlled substances and weapons.

    f. Procedures for screening and monitoring of clients.

13. Keys to Change will make a concerted effort to identify, pursue and implement strategies to address homelessness at a regional level that will reduce service demands on providers and facilities within and near the Special Permit boundaries. Keys to Change will include a summary of their efforts in an annual report to the Office of Homeless Solutions and the Planning and Development Department.

14. Keys to Change and other shelter providers within the Special Permit area shall work collaboratively with the City of Phoenix as well as adjacent property owners and associations on reducing any negative impacts or concerns stemming from those experiencing homelessness in the area surrounding the Key Campus Special Permit area through actions such as prioritizing outreach and shelter bed availability for people in the immediate area.

    a. The City of Phoenix and all neighborhood associations listed with the Neighborhood Services Department within one mile of the site shall be provided with a designated contact person for the Special Permit area to communicate any issues/concerns.

    b. Keys to Change and other shelter providers within the Special Permit area shall facilitate community outreach meetings to discuss compliance with the zoning stipulations, future development of the campus, any issues/concerns from the community, and how those concerns could be addressed by the shelter providers or the City if possible.

    c. The community outreach meetings shall be held semiannually for the first two years following approval and then annually thereafter, unless the Planning and Development Department Director requests that additional meetings are necessary during any particular calendar year.

    d. The notification for the community meeting shall be sent to all property owners within a half mile; all neighborhood associations listed with the Neighborhood Services Department within one mile; Council Districts 7 and 8; the Mayor's Office; and staff designated by each respective department director from the Office of Homeless Solutions, Neighborhood Services Department, Planning and Development Department, Street Transportation Department, Public Works Department, and Police Department.

    e. Topics of discussion shall include, but not be limited to how the shelter providers and the surrounding community can:

        (1) Encourage street maintenance;

        (2) Organize rubbish clean-ups;

        (3) Discourage street feeding, or donations of other items, in the area surrounding the Special Permit area;

(4) Coordination of holiday events to be consolidated in appropriate locations; and

(5) Prevention of crime.

f. A summary of the community meetings and any notes from the public shall be submitted to the Planning and Development Department. The community meeting summaries shall include the following meeting details:

(1) Date, time, and location;

(2) Number of participants;

(3) Questions or concerns that arose; and

(4) How the questions or concerns were addressed.

15. An annual report shall be provided to the Planning and Development Department, to include the following items:

a. Number of people served by each organization.

b. Number of positive exits for each organization.

c. If permitted, number of beds contracted to entities other than the City of Phoenix.

d. Meeting summaries as detailed above.

e. Summary of efforts to identify, pursue and implement regional solutions to homelessness that will reduce the service demand on providers and facilities within and near the Special Permit boundaries.

16. The Special Permit shall be reviewed two years after City Council approval of the Special Permit (Rezoning Case No. Z-SP-4-26-7). The review is for the entire Key Campus operation and shall be through the Planning Hearing Officer public hearing process where additional stipulations may be imposed. This is a legislative review. Specific development standards and requirements may be determined by the Planning Hearing Officer and the Planning and Development Department. Additional reviews or stipulations may be added by the Planning Hearing Officer or City Council.

17. 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.

18. The developer shall record a Notice to Prospective Purchasers of Proximity to Airport in order to disclose the existence and operational characteristics of Phoenix Sky Harbor Airport (PHX) to future owners or tenants of the property.

19. If determined necessary by the Phoenix Archaeology Office, the applicant shall conduct Phase I data testing and submit an archaeological survey report of the development area for review and approval by the City Archaeologist prior to clearing and grubbing, landscape salvage, and/or grading approval.

20. If Phase I data testing is required, and if, upon review of the results from the Phase I data testing, the City Archaeologist, in consultation with a qualified archaeologist, determines such data recovery excavations are necessary, the applicant shall conduct Phase II archaeological data recovery excavations.

21. 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.

22. Prior to any future permit issuance, 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.

23. For use separation purposes, by operating under this Special Permit, Keys to Change agrees to not own a low barrier shelter within 1.5 miles of the subject site.

24. Designated areas shall be provided for those waiting for services that shall accommodate each facility's maximum capacity/occupancy in such a way that those waiting for services do not congregate on the public rights-of-way or within the public streets. If queuing areas spill into the public right-of-way the queuing shall be in an orderly fashion to minimize the use of the public right-of-way.

25. The Special Permit may be revoked by the City Council per Section 504.1 C.6. of the zoning ordinance upon finding that there has been material noncompliance with any condition prescribed in conjunction with the issuance of the Special Permit or approval of the site plan or that the use covered by the permit or the manner of conducting the same is a safety hazard or is in any way detrimental to

persons residing or working in the vicinity, to adjacent property, to the neighborhood, or to the public welfare in general.

26. All meals shall be served on the properties within the Special Permit area. No meal services are permitted off-campus within public rights-of-way.

27. The service providers within the Special Permit area will highly discourage homeless persons from occupying abutting public rights-of-way by posting signage stating that camping and loitering is prohibited, by security patrolling the perimeter of the site, and by communicating to those persons that services and goods provided by the campus are available within the campus. Communication may be via posted notice, individual dialog by staff or other means.

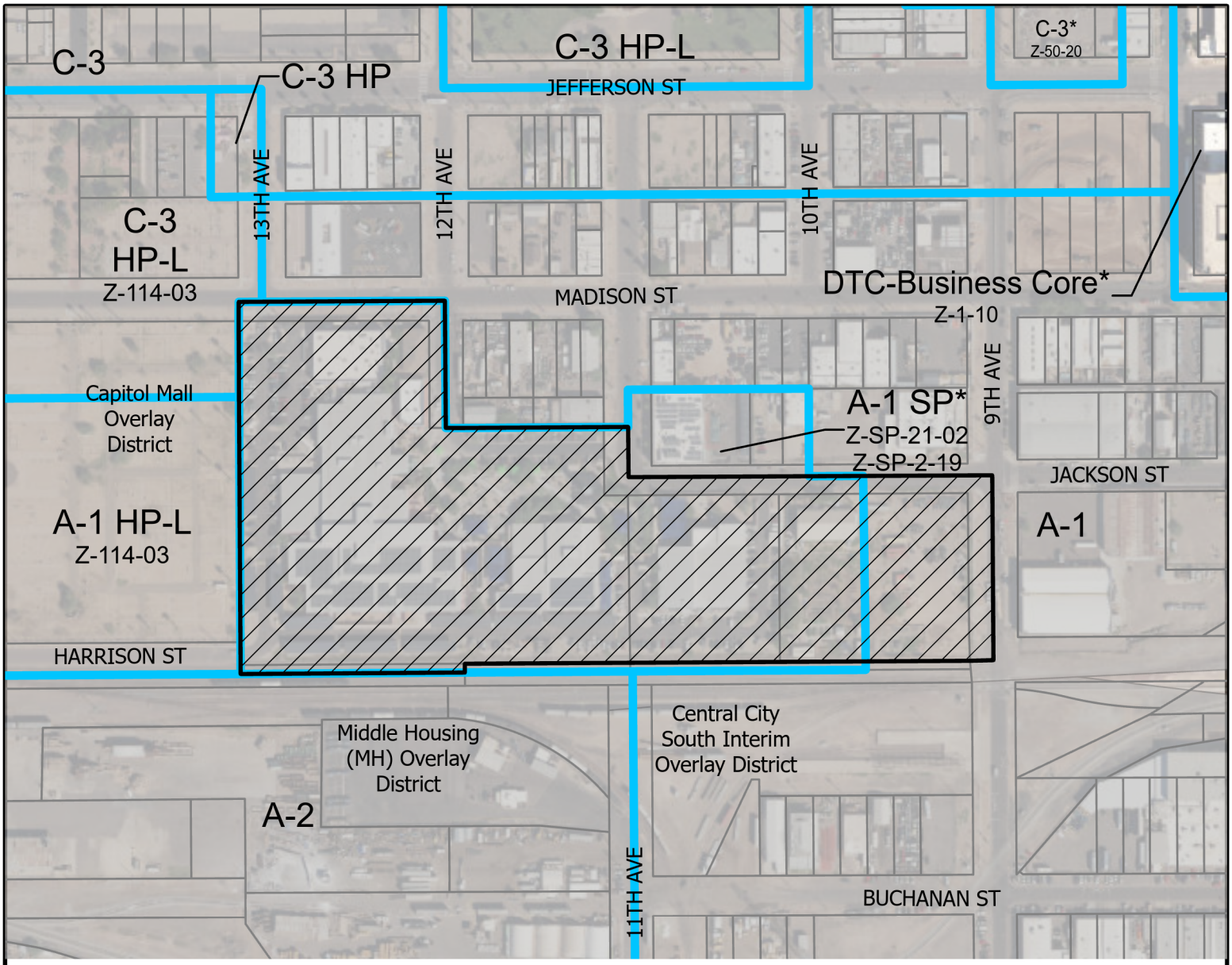
28. Keys to Change shall post signage along the perimeter of the property discouraging street feeding and distribution of materials within public rights-of-way.

29. Keys to Change, within 60 days of approval of this Special Permit, will review and update their written plan identifying how they will support efforts of the city's adopted strategies to address homelessness plan to regionalize efforts to combat homelessness and will provide a copy to the Planning and Development Department for review.

Writer
Samuel Rogers
November 6, 2026

Team Leader
Racelle Escolar

Exhibits
Aerial sketch map
Zoning sketch map
ADOA Approval Letter
Conceptual Site Plan date stamped May 1, 2026
*Correspondence (23 pages)

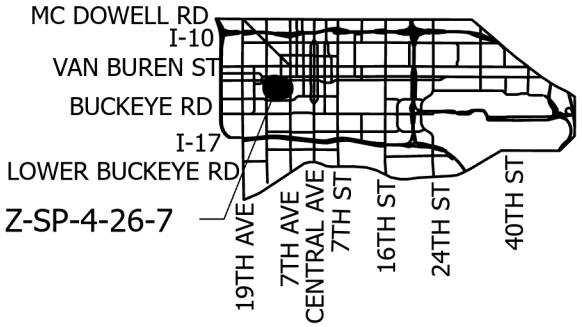


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CENTRAL CITY VILLAGE

COUNCIL DISTRICT: 7



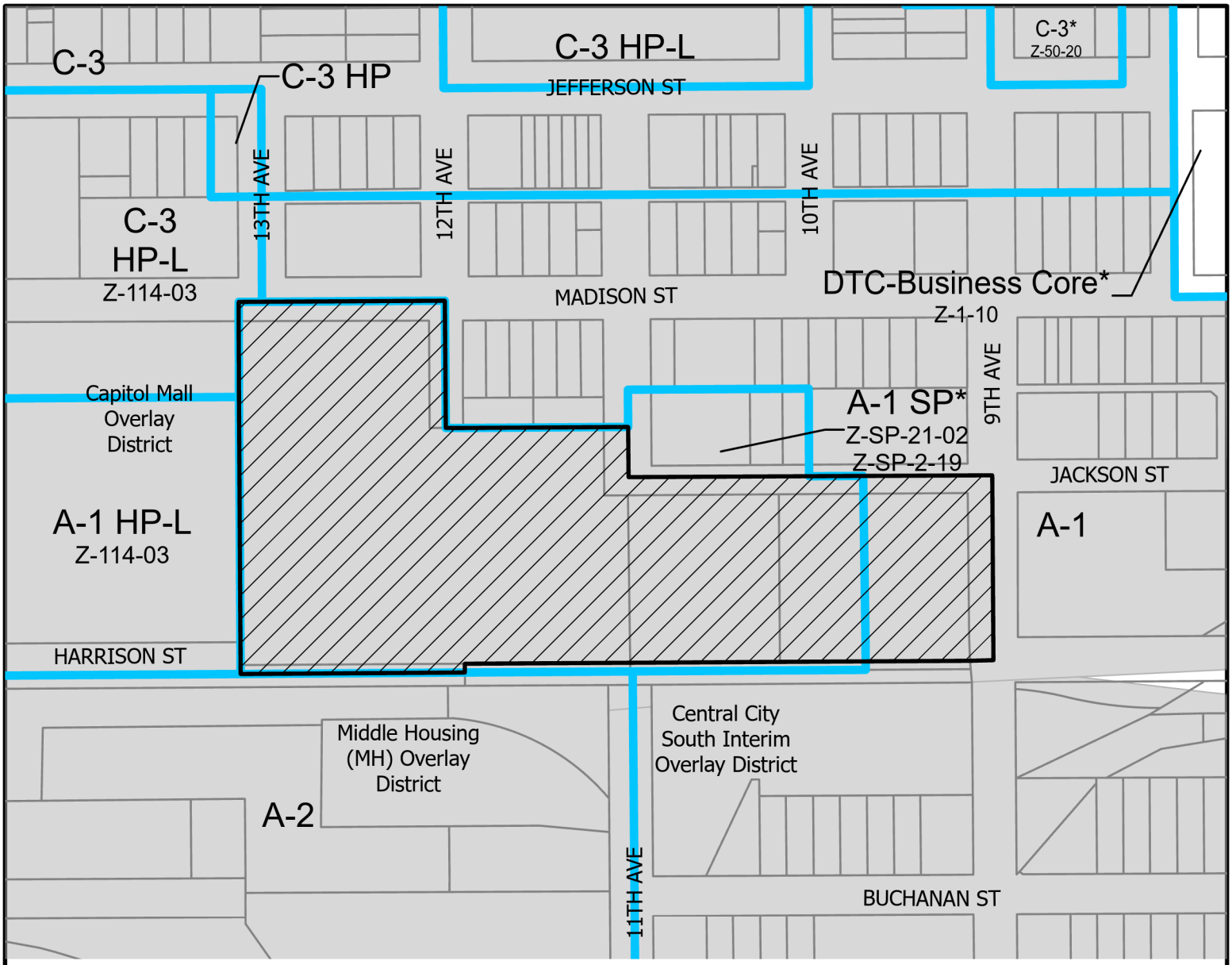
City of Phoenix
PLANNING AND DEVELOPMENT DEPARTMENT

APPLICANT'S NAME: Gilbert Blilie, PLLC		REQUESTED CHANGE:
APPLICATION NO: Z-SP-4-26-7	DATE: 7/23/2026 REVISION DATES:	FROM: A-1 SP CMOD MH (12.83 ac.) A-1 CMOD MH (1.88 ac.)
GROSS AREA INCLUDING 1/2 STREET AND ALLEY DEDICATION IS APPROX. 14.71 Acres	AERIAL PHOTO & QUARTER SEC. NO.: QS 10-26 ZONING MAP: F-8	TO: A-1 SP CMOD MH (14.71 ac.)

MULTIPLES PERMITTED	STANDARD OPTION	* UNITS P.R.D OPTION
A-1 SP CMOD MH, A-1 CMOD MH	N/A, N/A	N/A, N/A
A-1 SP CMOD MH	N/A	N/A

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

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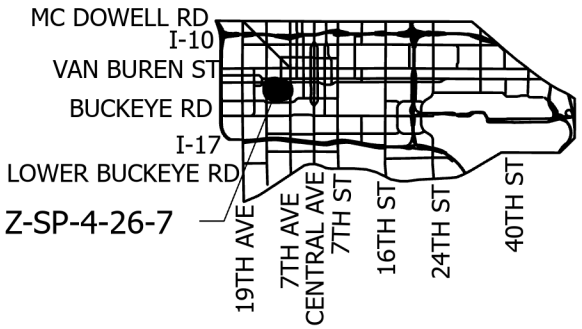


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0 0.03 0.05 0.1 Miles

CENTRAL CITY VILLAGE

COUNCIL DISTRICT: 7



City of Phoenix
PLANNING AND DEVELOPMENT DEPARTMENT

APPLICANT'S NAME:	Gilbert Blilie, PLLC
APPLICATION NO:	Z-SP-4-26-7
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GROSS AREA INCLUDING 1/2 STREET AND ALLEY DEDICATION IS APPROX.	14.71 Acres
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REQUESTED CHANGE:

FROM: A-1 SP CMOD MH (12.83 ac.)
A-1 CMOD MH (1.88 ac.)

TO: A-1 SP CMOD MH (14.71 ac.)

MULTIPLES PERMITTED	STANDARD OPTION	* UNITS P.R.D OPTION
A-1 SP CMOD MH, A-1 CMOD MH	N/A, N/A	N/A, N/A
A-1 SP CMOD MH	N/A	N/A

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

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ARIZONA
DEPARTMENT OF ADMINISTRATION
GENERAL SERVICES DIVISION

Katie Hobbs
Arizona Governor

Elizabeth Alvarado-Thorson
ADOA Director

Jill Pernice
Assistant Director

September 21, 2026

Andy Jochums
Gilbert Blilie PLLC
701 N 44th St.
Phoenix, AZ 85008

RE: 204 S 12th Ave - Keys to Change Special Permit Amendment

Dear Mr. Jochums:

Pursuant to the Arizona Department of Administration's (ADOA) planning authority under Arizona Revised Statutes Section 41-1362.B.3. for the Governmental Mall, the ADOA General Services Division (GSD) has reviewed the above referenced proposal and documents provided. Per the Governmental Mall General Plan this is an allowable use within this zoning designation (Special Use / Social Services).

ADOA has included the following stipulations with this review:

- Any changes to the Special Use permit relating to bed counts will be subject to approval by the CIty of Phoenix.

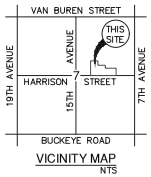
ADOA will defer to the City of Phoenix on any additional conditions it may stipulate in order to approve your plans and apply for any building and/or use permit. Please let me know if you have any questions or have additional context to provide to ADOA. I can be reached at ruben.duran@azdoa.gov.

Sincerely,

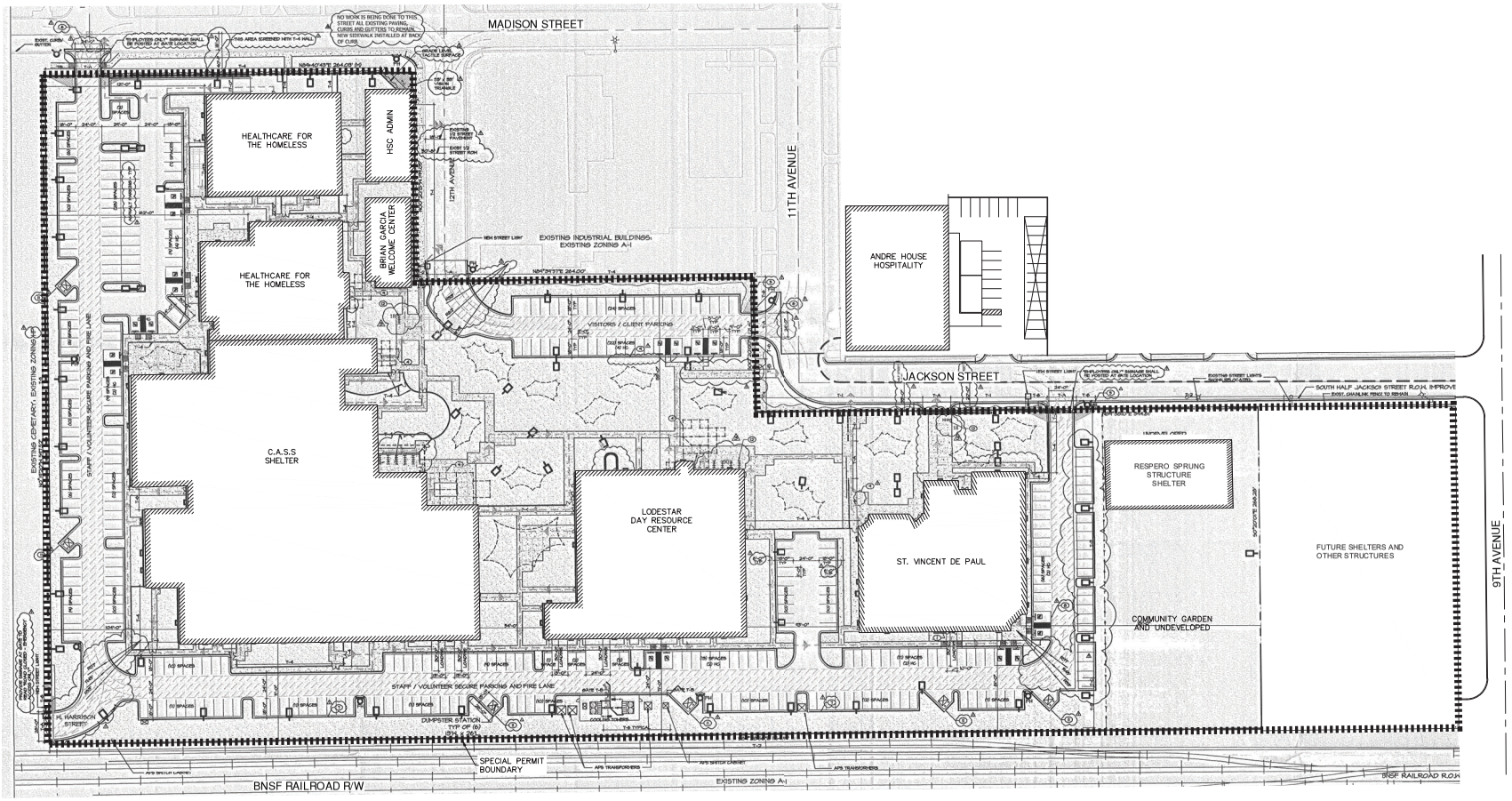
Ruben Duran

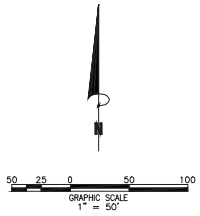
Ruben Duran
Building and Planning Manager
Planning and Construction Services
Arizona Department of Administration
ruben.duran@azdoa.gov | doa.az.gov

cc: Jill Pernice, Assistant Director, ADOA
John Hauptman, Deputy Assistant Director, ADOA
Joél Carrasco, Long Range Planning, City of Phoenix



VICINITY MAP
NTS





CITY OF PHOENIX

MAY 0 1 2026

Planning & Development Department

SPECIAL PERMIT SITE PLAN

KEY CAMPUS

PLAN STATUS

DATE	DESCRIPTION

DESIGN	DRAWN	CHKD

SCALE H:
V:

JOB No.

DATE : 04-14-2026

SHEET 1 OF 1

CAD FILE NAME: P:\9999 – Preliminary Projects\9999-01-001 (ENG)\Engineering\Human Services Campus\Human services campus2.dwg 01/13/2021

To: City of Phoenix Planning and Development Department 31 Aug 2026

RE: Key Campus Application Z-SP-4-26-7

I. Please do not approve Key Campus Application Z-SP-4-26-7 allowing expanding the boundaries and increasing the number of shelter beds. Currently the Key Campus does not comply with the current stipulations outlined in Ordinance G-6799 passed by the City Council of Phoenix on Feb 3rd, 2021. During the 14 Aug Neighborhood meeting for the Key Campus, the sponsor did not want to acknowledge previous limits and rational for the number of shelter beds within the Capital Mall Overlay. What follows is the letter sent to Councilwoman Hernandez for reference and to the sponsor, Gilbert Blilie.

The following confirms there is a historical limit and reason to limit the number of shelter beds for the charitable dining and shelter within the Capital Mall Area. Also referenced are documents cautioning making the current situation bigger by adding more shelter beds. My connection is being a member of the Madison Pioneer Coalition, a property owner on Madison Street near the Key Campus.

A. The first document confirming the limit of beds to a total of (425) is the staff report: Z-SP-2-19-7, dated October 5, 2020 for the Central City Village Planning Committee, Meeting Date: October 12, 2020, Page 5 of 19, (Item number) 4, is as follows:

"In 2003, Special Permit Z-SP-21-02-8 was approved to allow temporary shelter, charitable dining hall and food service uses on approximately 12.55 acres generally bounded by 242 feet west of the southwest corner 9th Avenue and Jackson Street south to Harrison Street, west to 13th Avenue and north to Madison Street, which encompasses the existing shelter area. The Special Permit was subject to the following two stipulations:

1. That the development shall be in general conformance to the site plan date stamped November 8, 2002 as approved or modified by the Development Services Department.

2. That an archeological excavation and recovery program shall occur to mitigate the adverse effects from construction to the cultural resources, and any prehistoric human remains shall be removed per the State of Arizona Antiquities Act standards.

Per the stipulated site plan for Z-SP-21-02-8, the Special Permit for the Human Services Campus was limited to no more than 425 temporary shelter beds on the property. No additional stipulations were added addressing the operations of the Campus."

B. Next Ordinance G-6799 passed by the City Council of Phoenix on Feb 3rd, 2021, amending the zoning district map described in case Z-SP-2-19-7. This ordinance included a stipulation allowing the area to have a total of (700) permanent shelter beds with a three year review. Also up to an additional 200 temporary beds (located at St Vincent de Paul) were to be used only during extreme weather condition for a maximum of three years. Note this temporary bed stipulation, and other stipulations, are being ignored by the Key Campus. These 'temporary' beds have become permanent and therefore are in violation of the City Zoning Ordinance.

C. Another document outlining the recommended number of shelter beds and homeless services is, "Capitol District Development Guidelines", dated June 1997.

Laurel D Langmade 1345 W. McKinley St Phoenix, AZ 85007

1. Page 9: Map 4 - Land Use Plan Proposed Land Use: “Central Arizona Shelter Services (CASS), located at 12th Avenue and Madison Street, shelters up to 400 homeless people each night. Other social services and eating facilities serving needy and homeless people are located in the area.”
2. Page 5: Section: “Purpose of the Development Guidelines” Item 7 states: “The concentration of homeless services within the area should be reduced.”

D. Another document identifying the original limit for shelter beds and guidelines for the Human Service Campus is a news report by KJZZ, Christina Estes, published February 6, 2020, titled “Phoenix Mayor Kate Gallego: Others Need To 'Step Up' On Homelessness”. I encourage you to read the whole article https://www.kjzz.org/2020-02-06/content-1430506-phoenix-mayor-kate-gallego-others-need-step-homelessness In this article it states:

1. “While Maricopa County (in 1986) took the lead and managed the development and construction of the Human Services Campus, Fields Moseley, Maricopa County Communications director said the intent was always to turn over the property to the Human Services Campus. In 2017, the county transferred the deed to the campus at the request of its board of directors. Based on its special permit with Phoenix, the Human Services Campus is limited to 425 beds.”
2. “This method of centralization also encourages practices that further burden the shelter, such as serving as a drop-off for individuals recently released from correctional or behavioral health facilities,” Gallego said. “This system cannot be the ‘catch-all’ for these individuals. Not only do more government entities need to step up to provide shelter, there needs to be a better system in place for transitioning those coming out of our correctional and behavioral health system successfully back into society.”
3. The Human Services Campus falls within the boundary of the Capitol Mall Overlay which the city established in 1986 to address property owner, business owner and residents’ concerns about concentrations of homeless services, according to Angie Holdsworth, spokesperson for the Phoenix Planning Department.
4. “The overlay contains additional regulatory provisions for all the land within its boundary,” she said. “It established a more rigorous process because of the potential negative impacts from this type of use.”

II. I didn’t find it surprising Mr. Gilbert would ignore acknowledging previous limitations and concerns regarding the number of shelter beds in the area. This Application Z-SP-4-27-7 is requesting the Key Campus to increase their boundaries in the special permit area and increase the number of beds from 900 to 1,200. I would hope Councilwoman Hernandez would agree to meet with us, the business owners around the Key Campus, and include the Woodland District in this meeting. Purpose would be to discuss the issues and history surrounding the Key Campus’ desire for a larger shelter facility. You would hear first-hand from us how the Key Campus has not met with the stipulations in Ordinance G-6799 plus why we are advocating that a bigger shelter is not better. A bigger shelter increases crime in the area, bigger reduces the services provided to individuals in need, and smaller shelters can focus on core needs (sleep, hygiene, basic meals). I, and the others in the Madison Pioneer Coalition hope to hear from you soon.

Truly,

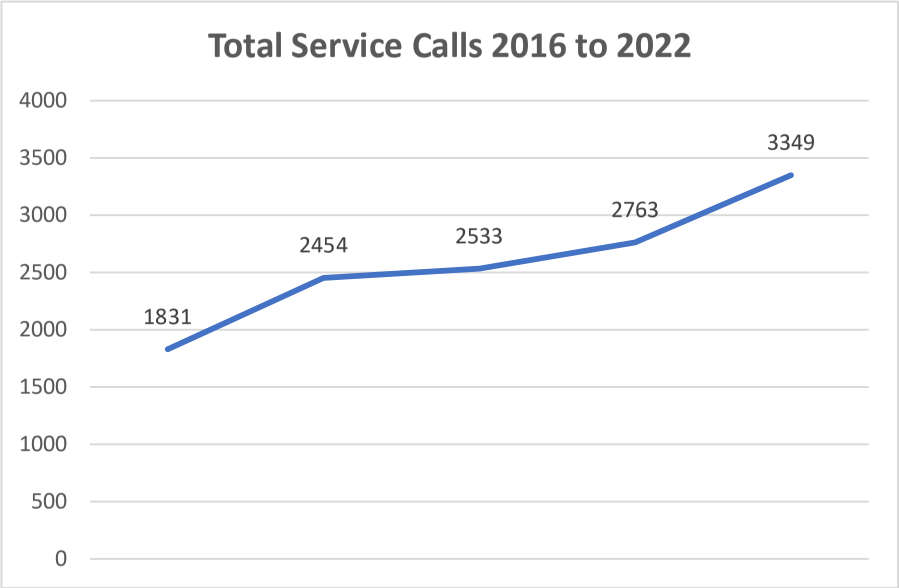
Laurel Dianne Langmade, eagleii@cox.net
Madison Pioneer Coalition

23-Aug-26

Citizen Generated Calls for Service in Grid BA26 for Police

Year	Jan	Feb	Mar	April	May	June	July	Aug	Sep	Oct	Nov	Dec	Total	AV/Day
2018	178	167	190	189	189	142	136	122	142	124	132	120	**1831**	5
2019	126	161	216	230	209	187	234	209	193	245	232	212	**2454**	7
2020	251	228	255	214	213	225	167	195	183	200	184	218	**2533**	7
2021	230	250	273	260	229	215	184	248	174	220	232	248	**2763**	8
2022	255	235	332	451	313	282	280	256	246	253	233	213	**3349**	9+
2023**	255	205	292	281	245	211							**1489**	8+
2025	187	239	261	248	233	212							**1380**	7+
2026	359	324	315	305	376	396	365						**2440**	11+

June 2023 data thru 26 June, not a full month**



		Jan -Jun	Jan -Jun	Apr-Jun	Jan-Mar
Summary Crime Data		**2026**	**2025**	**2023**	**2023**
Crime	**Code**	**Qty**	**Qty**	**Qty**	**Qty**
Armed Robbery	210 & 211	8	4	2	4
Fight or Assault	239 & 240	283	258	144	153
Aggravated Assault	245	28	20	21	18
Sexual assault	261	15	5	4	0?
Theft	487	108	54	31	42
Injured/Sick Person	901**	15	16	31	32
Insane-mentally ill	918	8	15	5	12
Shots Fired	415G	7	4	13	5
Trespassing	418T	81	127	149	83
Dead body	901H	3	4	3	8
Fire Dept call service	**	**672**	**542**	**332**	**339**

** Per Cmndr Freudenthal "901" code not used until March 2022, and it appears code (901) is not being used for 2023. Therefore , see "Fire Dept non-fire Calls for Service, 2xx S. 12th Ave (HSC)", added column for '901' **data for comparison to 2022 data.

Compiled by LD Langmade from weblink: **Source: https://www.phoenixopendata.com/dataset/calls-for-service**

Jan-Dec 2022 Qty	Jan-Dec 2021 Qty
32	17
661	515
58	44
14	13
157	92
1117	99**
39	44
30	8
261	347
15*	9

Outlook

Opposition to Key Campus Expansion — Application Z-SP-4-26-7

From Woodland Historic District <woodlandhistoricdistrict.phx@gmail.com>
Date Sun 10/18/2026 3:20 PM
To ajochums@gilbertblilie.com <ajochums@gilbertblilie.com>; Samuel S Rogers <samuel.rogers@phoenix.gov>
Cc Woodland Historic District <woodlandhistoricdistrict.phx@gmail.com>

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Report Suspicious

TO: Central City Village Planning Committee
FROM: Woodland Historic District Leadership Group
SUBJECT: Opposition to Key Campus Expansion — Application Z-SP-4-26-7

Dear Members of the Central City Village Planning Committee:

The Woodland Historic District respectfully requests that the Committee recommend **DENIAL** of the proposed Key Campus Special Permit amendment, which would increase authorized shelter capacity from 900 to 1,200 beds—a 33% increase, including a 50% increase in temporary/emergency beds.

Woodland is a historic residential neighborhood located near the Arizona State Capitol, Downtown Phoenix, and the Key Campus. Our residents have experienced the consequences of the homelessness crisis and the concentration of services in this area for years. We recognize the importance of providing effective services and pathways to permanent housing. However, continued expansion should not be approved without evidence that the existing operation is responsibly managed, that neighborhood impacts are being effectively addressed, and that additional capacity is the most effective use of public resources.

The court's findings demand accountability

In *Brown v. City of Phoenix*, Maricopa County Superior Court No. CV2022-010439, the Superior Court found that the City of Phoenix had created and maintained a public nuisance in the area known as the Zone. The court described severe conditions, including violence, open drug use, fires, human waste, and accumulated refuse. It issued a permanent injunction requiring the City to abate the nuisance on property it owns or controls. The Arizona Court of Appeals affirmed the injunction as clarified in August 2024. (*Brown v. City of Phoenix*, 258 Ariz. 302, 557 P.3d 321 (App. 2024).)

The court specifically identified the Human Services Campus as a draw for people seeking assistance and expressed concern that the City's approach had not given adequate consideration to the impacts on surrounding residents, businesses, and property owners. Although the injunction applies to City-owned or controlled property and did not establish that the Key Campus itself was legally responsible for the nuisance, the court's findings underscore the importance of addressing the consequences of concentrated homelessness services for neighboring communities.

The injunction helped address conditions in the Zone, but Woodland residents continue to report serious concerns. These include recurring trash and debris, overturned dumpsters, discarded drug paraphernalia, human waste, disruptive behavior, and incidents that leave residents feeling unsafe in their own neighborhood. Residents have also reported serious violent incidents, including two murders occurring within approximately 20 feet of board members' homes.

These concerns warrant a meaningful response. They should not be dismissed as an unavoidable consequence of providing services to people experiencing homelessness.

The City should evaluate the existing permit before approving expansion

In February 2021, the City Council approved Ordinance G-6799, expanding permitted shelter capacity at the Human Services Campus while imposing conditions intended to address neighborhood impacts, facilitate community engagement, document service outcomes, and encourage regional solutions to homelessness.

The ordinance included requirements for community outreach meetings, designated contacts for neighborhood concerns, coordination on sanitation and crime prevention, and annual reporting on people served, positive exits, and regional efforts to reduce demand on the Campus and nearby facilities.

Public records document implementation of several of these requirements, including community meetings and annual reports. However, the information available to our neighborhood does not establish that every applicable condition has been met consistently or that the intended protections have been effective in addressing the problems residents continue to report.

Before approving another substantial increase in capacity, we ask the City to conduct and publish a comprehensive review of compliance with the existing Special Permit, the findings of required annual reports, and the effectiveness of measures intended to mitigate neighborhood impacts. If this review has already been completed, we request a copy.

Community meetings and reports are important, but they are not substitutes for effective results. The City should demonstrate what has improved, what remains unresolved, and what corrective actions are necessary.

More shelter beds do not, by themselves, demonstrate progress

The current application seeks authorization for 900 permanent shelter beds, up from 700, and 300 temporary/emergency beds, up from 200. The proposed total of 1,200 beds represents a 33% increase in authorized capacity.

We understand that the Campus has reported filling its temporary/emergency beds every night, not merely during extreme weather events. This indicates sustained demand for shelter. But demand alone does not establish that expanding this centralized operation is the most effective long-term response.

The continued presence of unsheltered people in the surrounding area, alongside substantial shelter operations, raises important questions about how effectively the current system moves people into stable, permanent housing. Before approving expansion, the applicants should provide transparent data on:

- Permanent housing placements attributable to the Key Campus and its partner organizations.
- Housing retention at six and twelve months and returns to homelessness.
- Average length of stay in permanent and temporary shelter beds.
- The number of people served and positive exits, with clear definitions of those outcomes.
- The cost per successful permanent housing outcome.
- The effectiveness of existing security, sanitation, outreach, and neighborhood-impact mitigation measures.

The City should also require an explanation of why the proposed additional 300 beds are necessary, how the additional capacity will be managed, and what measurable outcomes the expansion is expected to achieve.

The goal must be to reduce homelessness and help people secure stable housing—not simply to increase the number of people a centralized facility can accommodate.

Homelessness is a regional responsibility

For decades, Downtown Phoenix has carried a substantial share of the region's homelessness-services burden. A sustainable regional response requires meaningful participation from neighboring municipalities, all Phoenix council districts, and public and private partners.

Expanding the Key Campus without a clear regional strategy risks reinforcing the concentration of services downtown rather than distributing responsibility more equitably. The City should evaluate whether investments in smaller shelters, noncongregate options, homelessness prevention, supportive housing, and services distributed throughout the region could better meet the varied needs of people experiencing homelessness while reducing the impacts concentrated in Woodland and neighboring communities.

We ask the Committee to consider not only whether more shelter beds are needed, but where they should be located, how they should be operated, and which approach produces the best long-term outcomes for both people experiencing homelessness and the communities in which services are provided.

Our request

Woodland supports effective, accountable solutions that help people leave homelessness behind while protecting the health, safety, and quality of life of surrounding neighborhoods. We do not believe the proposed expansion should be approved on the basis of demand alone.

We respectfully request that the Central City Village Planning Committee recommend **DENIAL of Application Z-SP-4-26-7**.

At a minimum, before any future approval is considered, the City and applicants should provide:

1. A comprehensive review of compliance with Ordinance G-6799 and the existing Special Permit conditions.
2. An evaluation of the effectiveness of current neighborhood-impact mitigation measures, with a corrective action plan for unresolved problems.
3. Transparent, independently verifiable data on shelter outcomes, permanent housing placements, housing retention, and returns to homelessness.
4. A comparative analysis of decentralized shelter and housing alternatives, including their costs and expected outcomes.
5. A coordinated regional plan demonstrating how other jurisdictions and Phoenix districts will share responsibility for shelter capacity, services, and permanent housing.

Woodland residents should not be asked to accept another 33% increase in authorized shelter capacity without evidence that the existing model is working effectively and that the proposed expansion will improve outcomes rather than intensify existing neighborhood burdens.

We urge the Committee to require accountability, documented results, and a regional approach before recommending any further expansion.

Respectfully,

Ventura Felix Herrera, Jr.

President

--

Woodland Historic District

Outlook

Opposition letter for Z-SP-4-26-7

From Korhan Kaftanoglu <kkorhan@gmail.com>
Date Mon 10/19/2026 10:50 AM
To Samuel S Rogers <samuel.rogers@phoenix.gov>

3 attachments (409 KB)
Opposition Letter .pdf; Attachment - Railside Entertainment - Data.pdf; Page 15 from homeless strategies final report.pdf;

CAUTION: This email originated outside of the City of Phoenix.
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Report Suspicious

Mr Rogers

Please find my attached opposition letter and 2 support documents for Z-SP-4-26-7. Please relay these documents to all the members of the committee and hearings. Let me know if you have any questions.

Thank you

--
Korhan Kaftanoglu

Subject: Formal Opposition to Proposed Key Campus Shelter Expansion

Dear Members of the Planning Commission,

I am writing as a neighboring property owner to formally express my opposition to the proposed expansion of Key Campus, operated by the nonprofit organization Keys to Change, from 700 permanent beds and 200 temporary beds to 900 permanent beds and 300 temporary beds.

While I recognize the importance of providing shelter and essential services to individuals experiencing homelessness, I have serious concerns regarding the proposed expansion, particularly given the existing public safety and sanitation conditions in the surrounding neighborhood.

1. Continuous Use of Temporary Beds and Compliance with Existing Authorization

Key Campus currently has 700 permanent beds and 200 temporary beds. The temporary beds were authorized specifically to provide additional shelter during weather-related emergencies. However, these 200 beds have remained continuously deployed since the facility received permission to utilize them, regardless of weather conditions.

The distinction between permanent and temporary capacity should not be based on whether individuals sleep on beds or mats, but on the circumstances and duration of their deployment. Accommodations intended for temporary weather-related relief should not become a routine extension of the facility's operating capacity.

The continuous deployment of these beds raises serious concerns regarding compliance with the conditions and original intent of the facility's authorization. If their use was expressly limited to weather-related emergencies, their ongoing deployment outside those circumstances would appear inconsistent with that authorization.

Before considering an expansion to 900 permanent and 300 temporary beds, the Commission should first address whether the facility has complied with its existing authorization.

2. Public Safety and Crime Rates

As a neighboring property owner, I am deeply concerned about the extraordinarily high crime levels in our immediate surroundings.

According to the attached crime statistics, within a half-mile radius of my property:

- **Violent crime is 9.1 times the Phoenix citywide average.**
- **Property crime is 3 times the Phoenix citywide average.**
- **Combined violent and property crime is approximately 4 times the citywide average.**

These figures reflect a neighborhood facing public safety challenges far beyond what is typical across Phoenix.

Crime at these levels should not be normalized or accepted simply because of the location or existing conditions of the neighborhood. Every property owner, employee, resident, patron, and visitor deserves a reasonable expectation of safety, regardless of where they are located.

I am not attributing all neighborhood crime to Key Campus. However, these conditions must be taken seriously when evaluating whether an additional 300 shelter beds should be concentrated in this immediate area.

3. Daily Sanitation and Neighborhood Conditions

My concerns extend beyond crime statistics to the conditions we experience directly outside our property.

I appreciate the City's efforts in cleaning and sanitizing the sidewalks surrounding our property multiple times per week. However, the reason these services are necessary is deeply concerning.

We encounter trash and biohazardous waste in front of our doors on a daily basis. The need for repeated municipal cleaning and sanitization simply to maintain acceptable conditions outside a property should not be considered normal.

While I am grateful for the City's responsiveness, frequent cleanup is not a substitute for addressing the underlying conditions. No property owner should have to accept daily exposure to unsanitary conditions as an ordinary consequence of being located in this neighborhood.

The proposed expansion raises concerns that existing sanitation and public safety challenges throughout the surrounding neighborhood could intensify without meaningful measures to address them.

4. Equitable Distribution of Shelter Capacity and Consistency with the City's Own Strategy

I am not opposed to increasing the number of shelter beds available in Phoenix. I recognize the need for additional capacity and support efforts to provide essential services to individuals experiencing homelessness. My concern is the continued concentration of these services in a neighborhood already facing significant challenges.

The City's own Strategies to Address Homelessness Plan specifically recommends smaller, specialized shelters distributed across multiple locations. The plan recognizes that shelter capacity should be developed throughout the region so that no single neighborhood bears a disproportionate share of the responsibility.

The proposed expansion of Key Campus to 1,200 beds appears fundamentally inconsistent with that approach. If the City's own strategy recognizes the benefits of smaller, geographically dispersed facilities, why is the City considering further expansion of an already exceptionally large campus?

The City's recent shelter developments demonstrate that a different approach is possible. Facilities such as the Phoenix Navigation Center, with 280 beds, and The Haven, with 170 shelter units, reflect a substantially smaller scale. **At 1,200 beds, the proposed Key Campus capacity would be more than four times the size of the 280-bed Phoenix Navigation Center.**

The surrounding neighborhood has also continued to accommodate additional services. Since the previous Key Campus expansion approval, the community has supported the establishment of the Safe Outdoor Space, located less than half a mile from the Campus, with capacity for up to 300 individuals.

This neighborhood has already contributed substantially to the City's shelter capacity. It cannot continually be expected to accommodate more while other parts of Phoenix are not asked to share that responsibility to the same extent.

Although Key Campus is operated by Keys to Change, the organization works closely with the City, making coordination between the operator and municipal authorities essential to addressing the facility's impacts on the surrounding community.

The existing shelter's operations have already placed substantial demands on emergency services in the surrounding area. From our experience, these resources are already overwhelmed, and further expansion risks adding to that burden.

Providing shelter is a citywide responsibility, and the associated demands should be shared more equitably across Phoenix rather than disproportionately concentrated in a single neighborhood.

There is also a broader consequence to allowing existing conditions to persist. When other neighborhoods see the crime, sanitation problems, and strain on public services experienced in this area, it can reinforce their fears about having a shelter in their own community. This risks creating greater resistance to new facilities elsewhere in the city, making it more difficult to expand shelter capacity.

Improving conditions around existing shelters is therefore not only a responsibility to neighboring communities, but also an important step toward building public confidence in future shelter development. Demonstrating that shelters can operate alongside safe, clean, and functioning neighborhoods would help address concerns about establishing facilities in other parts of the city.

The cumulative effects of these conditions have placed an ongoing burden on this neighborhood and the people who live, work, and visit here. These challenges wear down the community over time and should not be accepted as an inevitable consequence of providing shelter services.

A neighborhood should not have to endure deteriorating conditions simply because it has already been designated as a location for these services.

Has the City effectively written off this neighborhood as an area where conditions that would be unacceptable elsewhere are simply expected to be tolerated? The residents, businesses, employees, and patrons of this community deserve the same commitment to public safety, cleanliness, and quality of life as every other neighborhood in Phoenix.

Rather than continuing to expand an already substantial facility, I urge the City and Keys to Change to prioritize improving conditions around existing operations while pursuing the smaller, specialized, and geographically distributed shelter model outlined in the City's own strategy.

Conclusion

For these reasons, I respectfully request that the Planning Commission deny the proposed expansion in its current form.

My opposition is not to additional shelter beds, but to the continued concentration of shelter capacity in a neighborhood already experiencing crime rates far above the citywide average, persistent sanitation problems, and significant demands on emergency services.

Providing shelter is a citywide responsibility, and its associated demands should be shared more equitably across Phoenix. No single neighborhood should be expected to absorb an ever-increasing share of those challenges, particularly when the City's own planning documents recommend a more distributed approach.

Violent crime at nine times the citywide average, daily biohazardous waste outside neighboring properties, and the continuous deployment of temporary beds beyond their stated weather-related purpose should not become accepted standards for our neighborhood.

The people who live, work, and visit this area deserve the same expectations of safety, cleanliness, and quality of life as those in every other Phoenix neighborhood.

Thank you for your consideration. I respectfully request that this letter and the attached crime statistics be included in the official public record.

Sincerely,

[Your Name]
Neighboring Property Owner
[Date]

Attachments:

1. Crime and Neighborhood Data
2. City of Phoenix – Strategies to Address Homelessness Plan (2020), page 15

Liquor License Data: RAILSIDE ENTERTAINMENT

Liquor License

Description	Series	1 Mile	1/2 Mile
Producer	1	1	0
Microbrewery	3	2	0
Government	5	3	0
Bar	6	36	1
Beer and Wine Bar	7	6	0
Liquor Store	9	4	0
Beer and Wine Store	10	16	0
Hotel	11	5	0
Restaurant	12	57	2
Club	14	3	1

Crime Data

Description	Average *	1 Mile Average **	1/2 Mile Average***
Property Crimes	64.2	234.31	192.99
Violent Crimes	12.31	79	111.99

*Citywide average per square mile **Average per square mile within 1 mile radius ***Average per square mile within ½ mile radius

Property Violation Data

Description	Average	1/2 Mile Average
Parcels w/Violations	43	62
Total Violations	73	119

Census 2010 Data 1/2 Mile Radius

BlockGroup	2010 Population	Owner Occupied	Residential Vacancy	Persons in Poverty
1129002	815	37	22	24
1129003	1372	4	18	40
1131001	1015	7	8	28
1141001	2299	16	37	44
1142001	1321	36	22	50
1143011	1389	22	15	57
1143021	788	20	17	66
1143022	1689	9	31	48
Average	0	61	13	19

SHELTERS

GOAL

Provide adequate, accessible, smaller and specialized shelters and temporary housing for persons experiencing homelessness. Also, support and expand bridge and transitional housing opportunities for persons requiring additional medical, behavioral health, or other intensive supportive services before moving to permanent housing.

GAPS IDENTIFIED

There is a chronic shortage of beds and a need for additional capacity that should be met with smaller and specialized scatter site shelter facilities. Furthermore, there is a need for more low barrier facilities that accept partners, pets and possessions. Additionally, people are often met with wait lists for temporary (bridge) housing facilities while transitioning from emergency shelter to a more permanent housing.

STRATEGIES

Regional solution that provides shelters throughout Maricopa County so that no one city or neighborhood bears the brunt of providing shelter services for individuals experiencing homelessness. This requires working with non-profits and other valley cities to provide smaller, specialty/scattered site shelters that can provide decentralized case management and client services tailored to specific populations such as the seriously mentally ill, substance abuse/misuse, seniors, youth, LGBTQ+, disabled, families with children, individuals with spouses/partners and re-entry from the correctional system. This model is based upon the approach that small, specialty/scattered site shelters also have less impact on neighborhoods because shelter and services for individuals experiencing homelessness are not congregated in one neighborhood. These smaller, specialty shelters could also include tiny home shelter communities, modular units, or sprung structures for temporary shelter that can be easily deconstructed when more permanent options are found.

Continue use of Emergency Solutions Grant (ESG) funds, Community Development Block Grant (CDBG) funds and Housing Opportunities for Persons with Aids (HOPWA) to assist with increasing bridge and transitional housing.

Strategies Timelines

SHORT TERM — 1 YEAR OR LESS

Utilize a vacant hotel to provide 12 months temporary supportive housing for the most COVID vulnerable while assisting with rapid rehousing or housing vouchers.

Provide funding to relocate and transitionally house Veterans and support the US Vets program.

MEDIUM TERM — 1 TO 3 YEARS

Utilize Emergency Services Grant (ESG) and Community Development Block Grant (CDBG) funding to increase shelter capacity and modify services for social distancing provide additional rapid rehousing units, add resources to place homeless in housing vouchers.

Increase overall funding and resources for shelter facilities.

Partner with non-profits and health care organizations to expand successful, specialty shelter models.

Create and implement a regional strategy to increase the number of emergency and low barrier shelter beds valley-wide and bridge housing.

Identify vacant buildings that can be repurposed to provide shelter facilities.

Form partnerships and support organizations and other government entities to provide transitional facilities for substance abuse/misuse, mental illness, and correctional re-entry housing.

Seek partnerships, grants, demonstration programs, and foundations to expand transitional housing opportunities.

Utilize pass-through Federal HOME Program and Community Development Block Grant (CDBG) funding to assist housing providers with the acquisition/rehabilitation of facilities for transitional housing/recovery programs.

Outlook

Submission for Case Z-SP-4-26-7. Perimeter Operations & Stipulation Compliance (Ordinance G-6799)

From John Westerdale <john.c.westerdale@gmail.com>
Date Tue 10/27/2026 6:42 AM
To Samuel S Rogers <samuel.rogers@phoenix.gov>; Council District 7 PCC <council.district.7@phoenix.gov>
Cc Madison Pioneers Coalition <madisonpioneerscoalition@gmail.com>; Rachel B Milne <rachel.milne@phoenix.gov>; Scott Hall <scott.hall@phoenix.gov>; Lisa Huggins <lisa.huggins-hubbard@phoenix.gov>

1 attachment (595 KB)
Stipulations - G-6799 Signed.pdf;

CAUTION: This email originated outside of the City of Phoenix.
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Report Suspicious

Good morning Samuel,

Please accept this email, the attached reference copy of Ordinance G-6799, and the attached photos (taken 10/23–10/25, 2026, along Jackson Street at 9th Avenue and Madison Street at 11th Avenue) into the record for Case Z-SP-4-26-7, and forward them to members of the Central City Village Planning Committee.

Our goal as adjacent stakeholders is to ensure that campus operations remain safe, humane, and compatible with the surrounding community. In reviewing current street conditions, we documented significant operational issues regarding the perimeter stipulations established under Ordinance G-6799 (Case Z-SP-2-19-7):

- Stipulation 6 (Twice-Daily Refuse Abatement): Hazardous debris and litter along the 7th–15th Avenue / Jefferson–Harrison corridors remain unaddressed, creating serious public health and sanitation hazards throughout the public corridor.
- Stipulation 25 (Internal Queuing & Staging): Instead of being contained within designated on-site staging areas, lines and crowds spill directly into public streets and sidewalks. Sidewalks are actively obstructed, forcing vulnerable pedestrians and wheelchair users into traffic lanes.
- Stipulations 11, 26, 28 (Perimeter Security Coordination, Safety, and Oversight): Perimeter oversight along abutting rights-of-way is ineffective and does not currently meet the intent of these stipulations. Pedestrian movement and safety along the Jackson and

Madison corridors appear unmanaged. The absence of managed perimeter operations creates the exact "safety hazard" that is detrimental to the neighborhood and explicitly prohibited under Stipulation 26.

Under Phoenix Zoning Ordinance Section 504.1.A.2, compliance with stipulations is an ongoing requirement for continuing special permit uses.

Rather than advancing additional zoning modifications while foundational requirements remain unmet, we urge the Village Planning Committee to withhold any recommendation, or recommend denial, for Case Z-SP-4-26-7. The City and applicant must first establish and implement a verified perimeter management plan, backed by coordinated City and campus resources, to stabilize existing operations.

Please reach out if you need additional information or clarification regarding the documented dates and locations.

Best regards,
John Westerdale

Adjacent Property & Business Stakeholder












STOP

Outlook

Re: Keys to Change request to add shelter beds

From Jo-Ann Lowney <jolow999@msn.com>
Date Fri 11/6/2026 11:52 AM
To Samuel S Rogers <samuel.rogers@phoenix.gov>
Cc Madison Pioneers Coalition <madisonpioneerscoalition@gmail.com>

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Report Suspicious

Adding shelter beds to an already immense shelter complex in our neighborhood will not help anyone.
We have become the mecca for homeless people to be sent by all the surrounding cities and neighborhoods.
Making it bigger will only add to the homeless people roaming up and down our street without toilet facilities, the feeders, and the drug use.
It is imperative that other cities take responsibility for this issue and create shelters, housing, and services for their own residents.

Jo-Ann Lowney, Secretary of the Board
Museum of Arizona Artists (MOAZA)
www.moaza.org [moaza.org]

MOAZA
MUSEUM OF ARIZONA ARTISTS

And
Gallery 119
119 S 11th Ave
Phoenix, AZ 85007
Text: 602 576 0471

Outlook

Central City Village Planning Committee Hearing on increasing shelter beds

From Dan Langmade <dlangmade@gmail.com>
Date Fri 11/6/2026 1:39 PM
To Samuel S Rogers <samuel.rogers@phoenix.gov>

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Report Suspicious

Phoenix Zoning Department,
As a property owner with property at 10th Ave and Madison (APN112-05-125A, 086C) I object to additional beds at Keys for Change. The gathering and loitering of people is a public nuisance and has a detrimental effect on the tenants that lease the property. On more than one occasion I have been threatened, dealt with human excrement and trash complaints. Increasing the bed count will only compound the problem.

I request the the City of Phoenix strike down the zoning application

Dan Langmade

Longmeadow Properties LLP
1345 W. McKinley St.
Phoenix, AZ 85007