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Planning Director
and
Michelle Dodds
Historic Preservation Officer
City of Phoenix
200 West Washington, 3rd Floor
Phoenix, AZ 85003

October 6, 2015

Re: David and Gladys Wright House 6.1 Acre Historic Preservation Landmark Application /
Inclusion of Additional Property in the HP Boundary

Dear Alan and Michelle,

Thank you for the opportunity to provide input on the most recent application submitted by the David Wright House, LLC ("DWH") to place an Historic Landmark designation ("HP-L") over the entire 6.1 acres now owned by DWH. First, please know that I support the preservation of the home. While I am not convinced that the home warrants a Landmark designation, the purpose of this letter is to express why the recently acquired property both north ("Garote Estates") and south of the home (the "Exeter Lot") should *not* be given a Landmark designation ("HP-L").

I. The Historic Preservation Criteria

As all are aware, The City of Phoenix Zoning Ordinance defines "Landmark" as "A structure or site which contains an outstanding or unique example of an architectural style, which contains or is associated with a major historic event or activity, which contains important, intact archaeological resources, which is a site or structure of unique visual quality and identification, or which is a site of general historic or cultural recognition by the community. A landmark shall also meet all criteria for designation as an HP district."

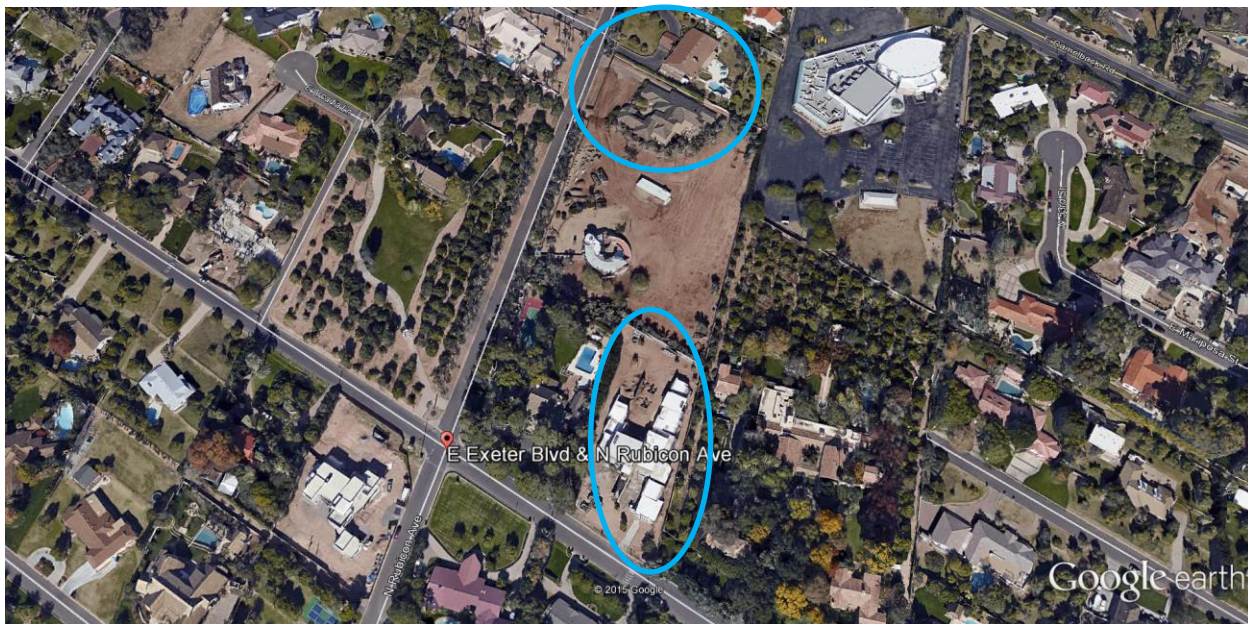
"The criteria for the HP [and HP-L] designation are as follows:

1. Significance.
 - a. Associated with the events that have made significant contribution to the broad patterns of our history; and/or
 - b. Associated with the lives of persons significant in our past; and/or
 - c. Embody the distinctive characteristics of a type, period or method of construction or that represent the work of a master or that possess high artistic values or that represent a significant and distinguishable entity whose components may lack individual distinction; and/or
 - d. Have yielded or may be likely to yield information important in the understanding of our pre-history or history of the City of Phoenix.

2. Age.
 - a. Are at least fifty years old; or
 - b. Have achieved significance within the past fifty years if the property is of exceptional importance.
3. Integrity. Retain sufficient integrity of location, design, setting, materials, workmanship, feeling and association to convey their significance.”

The, recently submitted, second application for Landmark Designation on The David and Gladys Wright House requests Phoenix HP Staff and HP Commission to include the vacant land north (Lots 1 & 2 Garote Estates) and south (Lot 8/SE portion) of the original 2.45 acres identified by HP Staff, The Frank Lloyd Wright Conservancy and Motley Design Group, LLC in 2012.

These criteria are illogical. How does a vacant lot, or even an orange grove, rise to this level of significance? How old is the lot, or the orange grove? And more importantly, where are the orange groves today? Regarding the integrity of the vacant land, simply look at the image below taken from Google Earth and note there were recently single-family homes on the now vacant lots north and south of the Wright Family home, all of which have been demolished by the Developer. Even if the homes had been significant, the now empty lots by definition cannot be.



Moreover, these criteria are illogical to apply because the City’s own Ordinance does not contemplate designating vacant land as HP-L. *It would be unprecedented for the City to designate vacant land of no historic value as HP-L.*

II. Drawing the HP-L Boundary

The same section of the Zoning Ordinance further states that “*when applying the evaluation criteria*” the boundaries of the district are to be drawn “*as carefully as possible to ensure:*

1. The district contains documented historic, architectural, archaeological or natural resources; and

2. The district boundaries coincide with documented historic boundaries such as early roadways, canals, subdivision plats or property lines; and
3. Other district boundaries coincide with logical physical or manmade features and reflect recognized neighborhood or area boundaries; and
4. Other, non-historic resources or vacant land is included where necessary to create appropriate boundaries to assist in meeting the criteria in Section 807.D.1 through 3.”
[emphasis added]

Note that before one can determine where to draw the district boundary, one must *first* determine that the evaluation criteria (significance, age and integrity) have been met. This is not possible for the vacant property to the north and south of the DWH.

A. Garote Estates (the lots to the north of DWH)

Below is a picture of DWH taken in 1956, and it depicts the orange groves that still permeate Arcadia, and the lots to the north of DWH later known as Garote Estates. Arcadia – 1956 History Adventuring.



Lot 4, Block “H” Arcadia (later named Garote Estates) was purchased from BR & Jeanette Webb by G.B. & Patricia Sherwood in 1948, but the Sherwood’s divorced in 1949 and Patricia became the sole owner in 1949. It was then purchased by Edward and Veronica Garote in June of 1950 (and given its name). The Garotes also divorced in 1957, and the property was retained by Edward. Edward later subdivided the land into three lots in 1964, in a partnership with Lazarro Paro of Royal Construction, Inc., and the two lots north of DWH were sold and developed as single family homes. While there seem to be a high number of previous owners that have divorced, there is little else that is remarkable about the history of Garote Estates.

i. Garote Estates Should not be Included in the HP District Boundary.

The DWH applicant states, "The boundaries of the HP-L designation have been drawn to document the historic architectural resources coinciding with documented historic boundaries of Exeter Boulevard, Rubicon Avenue and the citrus orchards to the north, integral in the design of the home and assisting in recovering the full integrity of setting, location and feeling of the David Wright House." Hickman Letter, Sept. 11, 2015. Yet, there are no documented "historical architectural resources" associated with Garote Estates. The citrus orchards to the north are ubiquitous in Arcadia, and Wright himself viewed them as an infringement on his views of Camelback Mountain.

In the book *Frank Lloyd Wright – The Masterworks*, by Bruce Brooks Pfeiffer and David Larkin, in describing the DWH the authors state "Arizona is famed for its clear blue skies, and Wright elected to cap the building with a sky-blue metal roof. From their elevated structure, the occupants of the house are unaware of their neighbors, whose houses hug the earth, and the citrus trees become like a "lawn," no longer infringing on the unobstructed view of Camelback Mountain." pg.233, emphasis added.

The oranges trees not only infringed on the Wright's view at ground level, but it was the orange trees the precipitated the Wright's purchasing Lot 8, due to the fact that Lot 7 contained too many orange trees and blocked any views the newly designed home might have on that parcel. This information was expressed to me directly, by Kevin Weight.

It is clear that a "careful" drawing of the HP district boundaries would not include Garote Estates because:

- (1) There are no documented historic, architectural, archeological natural resources in Garote Estates. The only "resource" the applicant has cited are orange trees, which Wright himself found to be a nuisance.
- (2) Historically, Garote Estates was not included in Wright's plans, and were developed and utilized as unremarkable single family homes.
- (3) To include these lots would ignore the recognized neighborhood boundary of Arcadia, and the long-standing use of this property as a home.
- (4) It is not necessary to create (or re-create) appropriate boundaries to assist in meeting the criteria is Section 807.D.1 through 3, as this was already accomplished in 2012. HP Staff report Z-24-12-6 states, "In this case, the proposed boundaries are based on a survey of the property that was completed in 2009 (MCR 1040-22). The boundaries include only the Wright House parcel and none of the adjoining lots. "

In the 2012 Assessment commissioned by the City of Phoenix, the Motley Design Group determined that, "although the 2 acre lot size is sufficiently smaller than the original ten acres, the property continues to retain enough of the original integrity to exemplify its association...with rural estates intended for affluent owners who would pursue agriculture as an avocation." In other words, the City's commissioned report confirms that it is not necessary to include Garote Estates to assist in meeting the criteria for the DWH to achieve an HP-L designation.

i. Garote Estates Could be Designated HP.

If the applicant is genuinely concerned that the Garote Estates (Lots 1 & 2) are necessary for the enjoyment of the DWH, he can apply for Garote Estates to be HP, and still request that the DWH be designated HP-L. Section 808 of the City of Phoenix Zoning Ordinance states that a "Landmark designation can occur for property already within an HP district or in conjunction with designation as HP."

I believe that the Arcadia community would likely support the preservation of open space, but will not support the inclusion of Garote Estates (Lots 1 & 2) in the application simply to fulfill the necessary pre-requisite for obtaining a Special Permit allowing non-residential uses. In fact, it is a misuse of the HP-L designation to claim this status for a residential home, for the sole purpose of then including it in a monetary operation.

B. The Exeter Lot

While admittedly the Exeter lot was part of the original DWH property, there can be little doubt that including it in the HP-L designation boundary would be a total disregard for the Arcadia neighborhood boundary, and more specifically, the Sonntags, who have resided at the corner of Rubicon and Exeter since 1980. The original 5 acre parcel (Lot 8) was subdivided in 1968 and has remained as three single-family residential lots for the past 47 years.

The property Section 807 E.3 of the Ordinance, which requires that the boundary be "carefully" drawn to reflect "recognized neighborhood or area boundaries" was undoubtedly included to prevent this very type of gerrymandering. Moreover, the City's own report confirms that it is not necessary to include additional property beyond the 2.45 acre DWH to retain its "original integrity." 2012 Assessment, Motley Design Group and subsequent Staff Report Z-24-12-6.

III. Conclusion

There simply is no justification for designating the Garote Estates (Lots 1 & 2) or the Exeter Lot as HP-L. The applicant can still apply for HP-L on the original 2.45 acres, and Garote Estates or the Exeter Lot can be HP if the applicant is sincere about preserving the land, or developed as single-family homes consistent with Arcadia.

Sincerely,

Tracy Wadas
Arcadia Resident