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**Sent:** Wednesday, July 2, 2025 10:21 AM  
**To:** CD P and Z Commission  
**Cc:** Tiffany Antol; Jennifer Mikelson  
**Subject:** Correction Regarding Housing Commission Comments

Hi,

I'm writing to correct a statement made by city staff at the June 25th P&Z meeting.

During the discussion on a potential ordinance for adaptive reuse and single-use residential projects, it was stated that a housing commission member initially both by-right, but ultimately favored adaptive reuse by-right and single-use residential as an incentive. I believe I was the housing commissioner in question, and that statement is incorrect. I initially supported single-use residential by-right and had no strong views on adaptive reuse. However, after listening to the other commissioners' comments - particularly from Devonna McLaughlin - I supported *both* of them by-right.

I think the misunderstanding stems from the way I phrased my approval at the end - it's hard to be concise on the spot and I apologize for the confusion. And though there was no official vote, if you go back and watch the [April Housing Commission meeting](#) I believe everyone who participated shared that opinion.

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Separate from the correction, I want to reiterate my reasons as a private resident for supporting single-use residential by-right:

The reason single-use residential buildings aren't currently allowed by-right in commercial zones is "[Euclidean Zoning](#)", a system that separates land uses into distinct residential, commercial, and industrial areas. This model is so common in American land use that it's taken for granted - like the sky being blue and grass being green. But Euclidean zoning is actually a relatively new paradigm.

Up until the early 20th century, land use regulations focused on building form (height, bulk, and design) and nuisances (noise and pollution). The idea of regulating what someone did with their property was a foreign concept. However, the 1926 Supreme Court case *Euclid v. Ambler* legalized the idea and it spread rapidly, driven in part by ugly racial sentiments. It was part of a broader (and quite successful) project to use zoning as a tool of segregation.

Over the decades, planners have recognized other downsides of Euclidean zoning. By separating where people live and where they access services, it entrenches car dependency and leads to longer commutes, increased traffic fatalities, greater social isolation, higher per capita carbon emissions, and sprawling development patterns that

consume land inefficiently. In response, many cities have begun to soften these strict divisions. For example, In Flagstaff we allow mixed-use buildings under certain conditions and our zoning code defines some mixed-use areas. Allowing single-use residential buildings by-right in commercial zones is the next logical step. However, I'm concerned about the proposal to limit these projects to the Affordable Housing Incentive Program. **Single-use residential should never have been prohibited in the first place.** These types of projects already advance key City goals, particularly those related to sustainability and carbon neutrality. Adding complex conditions or requirements will undermine the impact.

In my view, the better option is to legalize single-use residential projects by-right, and fix up the Affordable Housing Incentive Program so it's more attractive to all projects, not just these ones.

Best,  
Tyler Denham