



October 21, 2025

City of Glendale, Development Services Department  
Attn: Amy L. Schwenner, Planner  
5754 West Glenn Drive  
Glendale, Arizona 85301

**RE: Bench Properties, Inc., 6426 W. Del Mar Lane, Glendale, Arizona 85306;  
Disability Accommodation Variance Request Narrative**

Proposed Application Request:

Disability Accommodation Variance to operate a Group Home within 1,200 feet of an existing Group Home. – Section §35.3.102.F.6c. of the Unified Development Code (UDC) states that *“No such home or center shall be located on a lot with a property line within one thousand two hundred (1,200) feet of another such residential care home, residential care center or group care facility.”*

Dear Ms. Schwenner,

We represent Bench Properties, Inc. (the “Owner”), in its interest of the approximately 0.21 acre parcel located at 6426 W. Del Mar Lane, Glendale, AZ 85306 and generally located at the southeast corner of N. 67<sup>th</sup> Avenue and W. Greenway Road and identified by Maricopa County with assessor parcel number 231-07-818 (the “Property”) (See **Exhibit A** – Regional Context Aerial Map & **Exhibit B** – Context Aerial Map). The purpose of this request is for the review and approval of a variance to allow for a Disability Accommodation for a Residential Care Home (6-10), as described herein.

Project Description

The City of Glendale’s Unified Development Code (UDC), effective January 12, 2024, establishes a separation requirement of 1,200 feet between all Residential Care Homes and similar Group Homes, regardless of occupancy type. In this case, the Property does not meet that separation standard due to its proximity to two (2) existing licensed care facilities—ABACA Health II, LLC (located approximately 835 feet away) and G & G Comfortable Care Home (located approximately 910 feet away). As a result, the owner is requesting a Disability Accommodation under UDC §35.3.102.7 to permit operation of a Residential Care Home at the property despite the spacing restriction. The request is made to ensure compliance with the

intent and requirements of the Federal Fair Housing Act (42 U.S.C. § 3600 et seq.) and the Arizona Fair Housing Act (A.R.S. § 41-1491 et seq.), which mandate that reasonable accommodations be granted when necessary to afford persons with disabilities an equal opportunity to use and enjoy housing.

It should be noted that the Property has previously successfully operated in the past as a residential care home. During the time of its previous operations, there were no Property violations and/or issues with the City or surrounding neighborhood. In fact, it has been expressed to us that the neighbors are supportive of this use at the Property.

The requested accommodation satisfies all required findings under UDC Section 35.3.102(7), which provides that a Disability Accommodation may be granted only upon sufficient evidence. Each of these findings is addressed in detail within the accompanying narrative to demonstrate full compliance with the intent and provisions of the City's UDC and applicable fair housing laws.

**a. The requested accommodation is requested by or on the behalf of one (1) or more individuals with a disability protected under Federal and Arizona Fair Housing Laws (42 U.S.C. § 3600 et seq. and A.R.S. § 41-1491 et seq.)**

This request is made in accordance with the Federal Fair Housing Act (42 U.S.C. § 3600 et seq.), the Arizona Fair Housing Act (A.R.S. § 41-1491 et seq.), and the City of Glendale's Unified Development Code (UDC), which collectively require reasonable accommodations in rules, policies, and practices when necessary to afford persons with disabilities an equal opportunity to use and enjoy housing.

The proposed residence is intended to provide long-term care and support for elderly individuals who, due to physical or cognitive impairments, require assistance with daily living activities. These individuals are considered persons with disabilities under both federal and state definitions, as they experience limitations that substantially affect one or more major life activities. The home will operate in full compliance with all applicable licensing and safety standards to ensure residents receive quality care in an inclusive, community-based environment.

Although this request is not made on behalf of a specifically identified individual, it is submitted on behalf of those current and future residents who meet the legal definition of disability and are protected from housing discrimination. Bench Properties has undertaken preliminary marketing for clients and has found many individuals that meet this criteria and are seeking accommodations. This Disability

Accommodation is both inclusive and anticipatory—it enables the property to serve those who need accessible housing now and in the future.

Approval of this accommodation therefore upholds the intent of the City’s UDC and applicable fair housing laws by promoting integration, preventing discriminatory barriers to housing choice, and ensuring that Glendale remains a community accessible to individuals of all abilities.

**b. The requested accommodation is necessary to afford an individual with a disability equal opportunity to use and enjoy a dwelling**

This home is located less than 1,200 feet from another group home and does not meet the City’s spacing requirement. Therefore, the requested accommodation to decrease this spacing requirement is necessary to establish this housing opportunity for those that desire and require the services that will be established by Bench Properties at the Property.

**c. The standard or requirement unduly restricts the opportunity for a person with a disability from finding adequate housing within the City of Glendale**

To rightfully evaluate the local housing landscape, outreach was recently conducted with fifteen (15) residential care homes located within the same zip code as the Property. Each facility was contacted directly, and data was compiled to confirm facility use and address, bed capacity, and current availability. The following summarize the information received regarding bed capacity and availability:

Facility Name and Location	Bed Capacity	Beds Available (as of October 2025)
<b>ABACA Health II, LLC</b> 15233 N 66th Ln, Glendale, AZ 85306	5	1 private
<b>G &amp; G Comfortable Care Home</b> 15247 N 63rd Dr, Glendale, AZ 85306	10	0
<b>Lydia’s Adult Care Home, LLC</b> 6208 W Caribe Ln, Glendale, AZ 85306	10	1 private
<b>Acoma Senior Care LLC</b> 5820 W Acoma Dr, Glendale, AZ 85306	8	1 shared
<b>Beverly Assisted Living Home</b> 6219 West Beverly Ln, Glendale, AZ 85306	5	0
<b>Hellens Adult Care Home</b> 6245 West Kings Ave, Glendale, AZ 85306	5	0
<b>Arizona Sunshine Assisted Living</b> 6008 West Paradise Ln, Glendale, AZ 85306	10	1 shared
<b>Kristal Bell Care Home of Glendale</b>	10	0

5748 West Marconi Ave, Glendale, AZ 85306		
<b>Arizona's Golden Heart II</b> 5019 West Paradise Ln, Glendale, AZ 85306	8	1 shared
<b>Elliecare</b> 4857 West Beverly Ln, Glendale, AZ 85306	10	0
<b>Ashlee Care</b> 4902 West Beverly Ln, Glendale, AZ 85306	10	0
<b>Kristal Bell Assisted Living Home LLC</b> 4950 West Phelps Rd, Glendale, AZ 85306	10	0
<b>Kristal Bell Assisted Living Home II</b> 4926 West Phelps Rd, Glendale, AZ 85306	5	0
<b>Anna's Angels Assisted Living Home</b> 4670 West Aire Libre Ave, Glendale, AZ 85306	8	1 shared
<b>Starlight Care Seniors, LLC</b> 16631 North 46th Ln, Glendale, AZ 85306	10	0

Results of this analysis revealed that only three (3) facilities had 1 private bed each available and four (4) facilities has 1 shared bed each available. When speaking to the facilities, it was common for the facility to inform us that the spaces fill up quickly and they rarely have openings for a very long time.

Also, in many cases, open rooms are designated by gender—meaning that a vacancy in a “female” room would not accommodate a male, and vice versa. As such, the true accessibility of available rooms is even more limited than raw vacancy numbers suggest.

Therefore, the number of facilities capable of serving this segment of the population is even smaller, underscoring the critical and ongoing need for additional, accessible residential options within the City of Glendale, especially in this general area.

**d. The requested accommodation does not fundamentally alter the nature and purpose of the UDC of the City of Glendale**

The requested accommodation is consistent with the intent and purpose of the City’s Unified Development Code, which seeks to promote the public health, safety, and general welfare of the community through compatible land use and orderly development. The proposed use represents a continuation of the Property’s historical function as a residential care home, rather than an introduction of a new or incompatible use.

No external structural modifications or site alterations are proposed that would alter the residential character of the neighborhood. Accordingly, a floor plan with a

building sketch and photos of the front, rear, and street views has been provided in lieu of a formal site plan, as no physical development to the Property is proposed (see **Exhibit C – Conceptual Floor Plan**). The home will continue to operate in a manner that is both visually and functionally consistent with the surrounding single-family residences. The only changes involve interior improvements necessary to meet current accessibility and safety standards for residents with disabilities.

Additionally, the Applicant mailed a notification letter to all surrounding parcel owners on June 27, 2025 to notify and describe the proposed residential care home use on the Property. The Applicant received one (1) response from an adjacent neighbor expressing his support for the proposal and expressing that he had nothing but positive things to say about the previous residential care home on the Property.

Accordingly, the request does not fundamentally alter the nature, intent, or purpose of the City's UDC. Instead, it aligns with the Code's underlying objectives by providing safe, accessible, and equitable housing opportunities for individuals with disabilities within a residential setting that remains compatible with the surrounding community.

**e. The requested accommodation will not impose an undue financial or administrative burden on the city, as "undue financial or administrative burden" is defined in Federal or Arizona fair housing laws (42 U.S.C. § 3600 et seq. And A.R.S. § 41-1491 et seq.) and interpretive case law.**

The requested accommodation will not create any undue financial or administrative burden on the City of Glendale. The approval and oversight of this request involve only standard administrative review procedures that fall well within the City's normal operational scope and resources. No additional public expenditures, infrastructure improvements, or ongoing enforcement measures are required as a result of this accommodation.

The proposed use utilizes an existing single-family residence that has previously operated as a care home, requiring no expansion of municipal services or capital investment. All necessary improvements will be privately funded by the Property owner to ensure the residence meets applicable safety and accessibility standards.

Accordingly, the City's role is limited to the review and issuance of the requested accommodation—a process that represents a minimal administrative action. Granting this request will, in fact, advance the broader objectives of both the

Federal Fair Housing Act and the Arizona Fair Housing Act by facilitating equal housing opportunities for individuals with disabilities, while imposing no measurable cost or administrative impact on the City.

Conclusion

Small-scale residential care homes such as this one serve as a vital community resource by providing high-quality, compassionate care for elderly residents within a familiar and residential setting. These facilities enable families to remain close to their loved ones while ensuring they receive individualized attention in a safe, supportive, and neighborly environment. Importantly, such homes are inherently low-impact uses that operate in a manner consistent with surrounding single-family neighborhoods, generating minimal traffic and maintaining the overall residential character of the area.

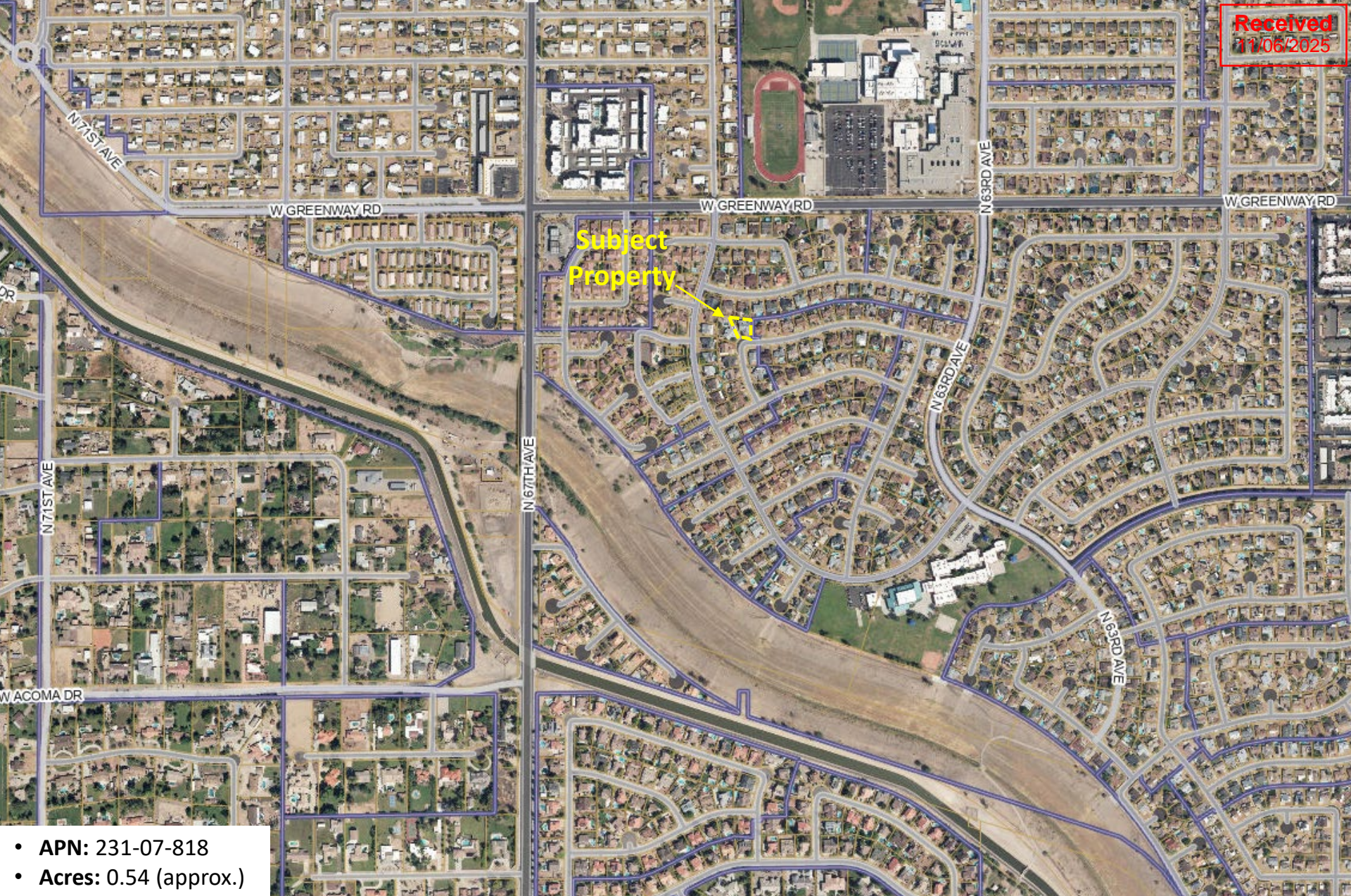
The Applicant recognizes the exceptional opportunity this request represents to expand access to affordable and equitable housing for individuals with disabilities. The proposed accommodation aligns with the intent of both federal and state fair housing laws by ensuring equal opportunity for all persons to use and enjoy a dwelling of their choice.

The Applicant and Property owner remain fully committed to complying with all applicable City of Glendale regulations, including but not limited to: (1) maintaining an active State license, (2) maintaining a current City of Glendale business license, and (3) maintaining a valid Certificate of Occupancy. Thank you for your considerations. We look forward to your response and continuing to work with the City on this Disability Accommodation Variance Application.

Respectfully,  
**TIFFANY & BOSCO, P.A.**



Shaine T. Alleman



Subject  
Property

- APN: 231-07-818
- Acres: 0.54 (approx.)

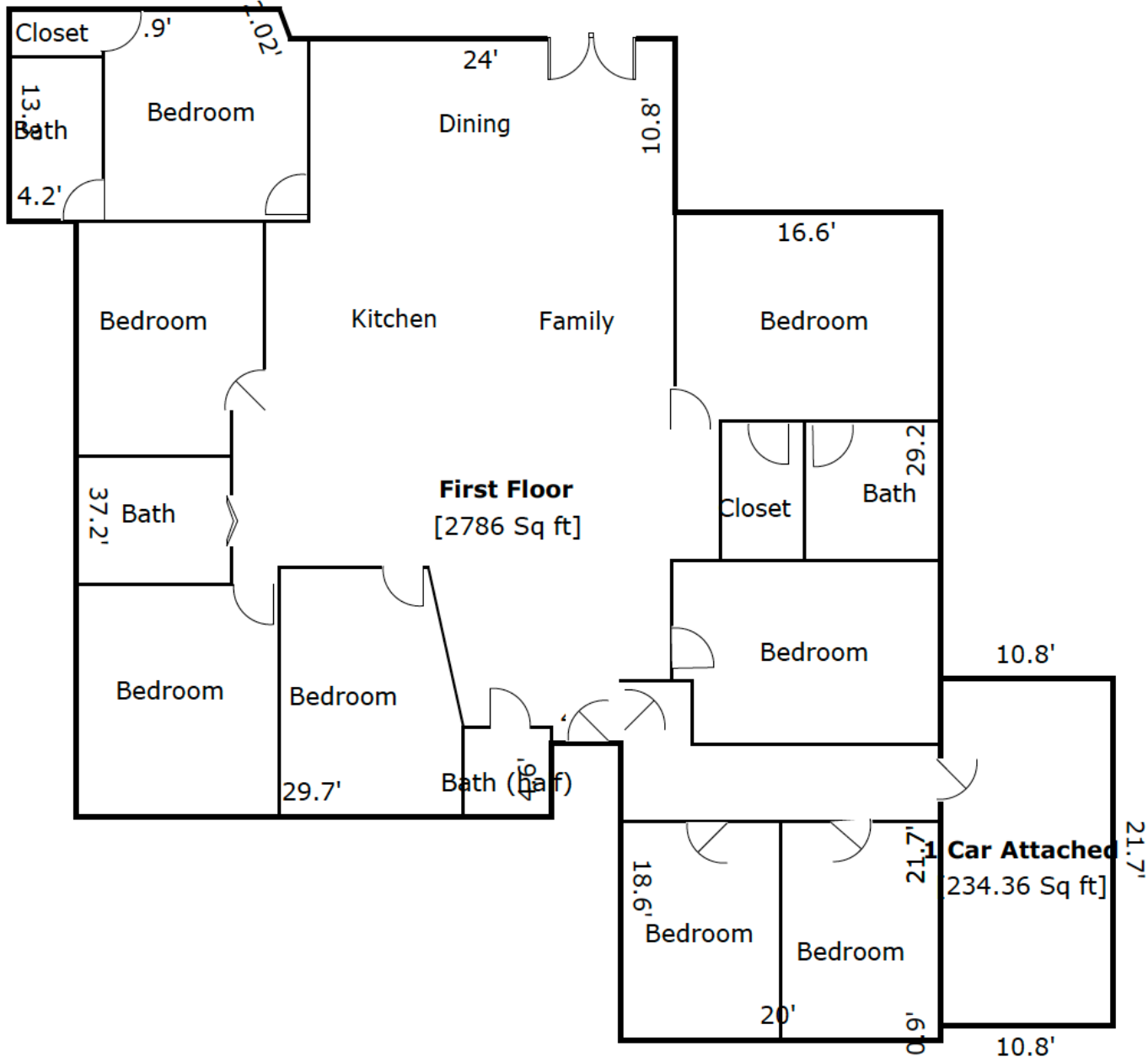
**Exhibit A - Regional Context Aerial Map**  
Bench Properties; Assisted Living – 6426 W Del Mar Lane, Glendale

Received  
11/06/2025



- APN: 231-07-818
- Acres: 0.54 (approx.)

**Exhibit B - Context Aerial Map**  
Bench Properties; Assisted Living – 6426 W Del Mar Lane, Glendale



**Exhibit C – Conceptual Floor Plan**  
Bench Properties; Assisted Living – 6426 W Del Mar Lane, Glendale