



TO: Mayor and Council

FROM: Tom Crawford, City Administrator

CC: Derek Delacourt, Community Services Area Administrator
John Fournier, Assistant City Administrator
Craig Hupy, Public Services Area Administrator
Raymond Hess, Transportation Manager
Nick Hutchinson, City Engineer
Matthew Kulhanek, Fleet & Facilities Managers
Brett Lenart, Planning Manager
Missy Stults, Sustainability & Innovations Manager

SUBJECT: November 16, 2020 Council Agenda Responses

DATE: November 16, 2020

CA-1 – Resolution to Prohibit On-Street Parking on the North Side of Scio Church Road between South Maple Road and Greenview Drive

Question: Is there parking on the south side of Scio Church Road in this area? Or would this change effectively eliminate all parking on both sides of Scio Church Rd? (Councilmember Disch)

Response: There is currently no on-street parking along the south side of Scio Church Road, however there are also very few houses fronting on the south side of Scio Church in the majority of this area. On-street parking would still be available to residences on the north side of Scio Church on the side streets (Waltham, Covington, Winsted, and Mershon).

The results show 17 postcards returned. How many were sent out altogether? (Councilmember Disch)

Response: A total of 32 postcards were mailed out to residences immediately adjacent to Scio Church Road.

Question: The Public Meeting, A2 Open City Hall and Postcard Survey have very different results. When a survey is submitted, are the respondents addressees included, and is each response unique? That is, are all 211 responses from different addresses/persons? (Councilmember Hayner)

Response: Responses at the Public Meeting were collected with anonymous clickers, each meeting participant was allowed one clicker, and therefore one response. Respondents were asked to self-identify whether they live or own property near the project area; specific addresses were not collected during the Public Meeting feedback.

The A2 Open City Hall survey platform does collect address information, which is used as part of their screening process to detect fraud and screen for redundant responses from an individual user; Browser ID, IP address, email address and name are also considered as part of the fraud detection screening. An email address is required to register on A2 Open City Hall, and submit a survey response. Multiple users at a specific address are allowed to submit a response to the same A2 Open City Hall Survey. However, survey results cannot be queried by specific address. Though address data is tracked by the platform vendor, it is not viewable publicly, nor viewable to city staff.

The postcards were sent only to property owners adjacent to the existing on-street parking; and only one postcard was mailed to each address.

Due to the various survey methods employed, it is possible that an individual could have contributed feedback through multiple avenues and may be represented more than once in the overall feedback results.

Question: Have the residents of the 1-2 houses that were observed to use the street parking been reached out to for specific comment? (Councilmember Hayner)

Response: After the postcard survey went out, an email was received from one residence, which was adjacent to the only location along Scio Church where on-street parking was regularly utilized. Following is the text of that e-mail:

“None of the driveways in that area are able to park more than one car. We have multiple cars and a big family. How can we get in and out of our garage/driveway with multiple cars? We could no longer use our garage. How far away do you expect us to park and walk to our home? We have been here in this home for 45 years. Now that I am getting to my aging years I would have to walk a long distance from my home? How can we do this in the winter with the snow? We do foster care. Where are our holiday visitors, foster workers, state case workers, lawyers, maintenance.....supposed to park? All these people come to our house regularly. Our standard of living will be greatly depleted. This will lower the value of our home and also make it a hard sell. How do we sell a house

when people coming to look at it can't even park by it. We have no available close parking to our home. There already is an existing bike lane on the south side of the street.

Please advise when the next meeting is for parking on Scio Church Road.

EMPHATICALLY NO, I do not support the removal of on-street parking.”

Note: A complete summary of responses received from the postcard survey of adjacent property owners is attached.

Thanks for City website links to help interpret the survey percentages listed (i.e. which %age was pro or con). I cannot find clarification of the postcard results on the City website—of the 17 postcard surveys of adjacent property owners, were 64.7% opposed? Is it possible that any of those 17 postcard surveys overlapped with the January in-person meeting (and counted twice)? (Councilmember Nelson)

Response: Responses at the Public Meeting were collected with anonymous clickers, each meeting participant was allowed one clicker, and therefore one response. Respondents were asked to self-identify whether they live or own property near the project area; specific addresses were not collected during the Public Meeting feedback.

The A2 Open City Hall survey platform does collect address information, which is used as part of their screening process to detect fraud and screen for redundant responses from an individual user; Browser ID, IP address, email address and name are also considered as part of the fraud detection screening. An email address is required to register on A2 Open City Hall, and submit a survey response. Multiple users at a specific address are allowed to submit a response to the same A2 Open City Hall Survey. However, survey results cannot be queried by specific address. Though address data is tracked by the platform vendor, it is not viewable publicly, nor viewable to city staff.

The postcard surveys were sent only to property owners adjacent to the existing on-street parking; and only one postcard was mailed to each address.

Due to the various survey methods employed, it is possible that an individual could have contributed feedback through multiple avenues and may be represented more than once in the overall feedback results.

CA-3 – Resolution to Accept and Appropriate Michigan Supreme Court State Court Administrative Office Drug Court Grant Funds and Approve Grant Contract (\$117,000.00) (8 Votes Required)

CA-4 – Resolution to Accept and Allocate Michigan Supreme Court State Court Administrative Office Michigan Veterans Treatment Court Grant Award and Approve Grant Contract (\$35,313.00) (8 Votes Required)

CA-5 – Resolution to Accept and Appropriate Michigan Supreme Court State Court Administrative Office Mental Health Court Grant Award and Approve Grant Contract (\$167,000.00) (8 Votes Required)

Question: Why are these grant funds accepted “without regard to City Fiscal Year”? (Councilmember Hayner)

Response: The City’s Fiscal Year and all related annual budget appropriations run from July 1 to June 30 each year. These grants run on a different annual (state) schedule, so that funds are distributed at points spanning two City fiscal years (FY21 and FY22). The “without regard to fiscal year” language effects a budget appropriation in the FY22 budget to allow collection and appropriation of the grant funds in FY22, which is why the resolution requires 8 votes.

CA-6 – Resolution to Approve the Purchase of Police Vehicles from Signature Ford (Macomb County Cooperative Purchasing - \$293,552.00)

Question: In our police department (and consistent with the terms of our labor contracts), which typically happens first: a vehicle reaching 80,000 miles or 6 years? (Councilmember Nelson)

Response: Vehicles used in patrol activities usually reach 80,000 miles before the 6 year limit. Detective and special use vehicles (crime scene van, transport van, etc.) typically reach the 6 year limit before mileage limit. The AAPD leadership often work with the Unions to extend years and miles in Memorandums of Understanding (MOU’s) when we identify vehicles in good enough shape to remain in our fleet.

Question: When was the last time this term of the contract was altered, what is the history of this particular term in the contract? (Councilmember Nelson)

Response: The provision of the contract that dictates the turnover of vehicles has been in effect since 1972, when the mileage limit was set at 40,000 miles. In the 1980s the provision requiring vehicles to be retired after six years was added to the contract, and the mileage limit was increased. The latest update to this section was made 22 years ago in 1998 when the mileage limit was increased to 80,000 miles. It has not been altered since. From time to time the City and the Union will agree through a memorandum of understanding to keep a vehicle in service beyond the six year limit if the vehicle mileage is low and the vehicle is in excellent condition. We will also replace a vehicle early if it fails our inspection standards or is irreparably damaged. However, in the vast majority of cases the six year/80,000 mile limit is an appropriate time to retire a police vehicle.

CA-7 – Resolution to Approve a Grant Contract with the Michigan Department of Transportation for Work Related to the Environmental Assessment Study for the Safety Extension of Runway 6/24 at the Ann Arbor Municipal Airport (\$109,517.00)

CA-8 – Resolution to Approve the First Amendment to a Professional Services Agreement between the City and Mead & Hunt Inc. for Work Related to the Environmental Assessment Study for the Safety Extension of Runway 6/24 at the Ann Arbor Municipal Airport (\$109,516.88)

Question: Do we have a timeline for when the Environmental Assessment will be complete, when a decision related to runway changes is likely to be presented to the surrounding public and Council? (Councilmember Nelson)

Response: Unfortunately the time frame has been fluid as we work with both the Federal Aviation Administration and MDOT-Office of Aeronautics on this project. The current timeline is projecting a public informational meeting on the draft EA in August/September 2021 and a completed EA document by the end of 2021. City Council does not take any action on the EA. Steps to transition the proposed project to an actual project (funding, engineering, etc.) would likely be presented to City Council in early 2022. Any public input process the City Council would like to pursue would be integrated into those steps in early 2022. This timeline, however, is subject to the review timelines of our federal and state partner agencies and could be delayed based on their actions.

CA-10 – Resolution to Approve Amendment No. 1 to the Personal Services Agreement with Julie Roth, for Support Related to Administering the Ann Arbor Solarize Program (\$30,000).

Question: Under which part of the OSI approved budget is this item to be found? (Councilmember Hayner)

Response: This work is included in the approved FY 21 budget under the Contracted Services portion of the Millage.

Question: What has been our cost per contact and cost per response for this first segment of the program? Please include internal costs as well as contracted costs. (Councilmember Hayner)

Response: The initial contract with Ms. Roth for this work was \$20,000. We are nearing the end of that contract which is why we are coming for an extension. Based on the work Ms. Roth has done for this contract amount, we have seen the following outcomes:

- 9 Solarize events run
- 393 participants in the 9 events
- Over 500 people engaged through outreach events
- At least 107 solar arrays installed through the program (this number is the low end of installations completed as individuals continue to sign contracts)
- Over 700kWh of solar installed (this number represents the low end of installed capacity as individuals continue to sign contracts)
- At least \$250,000 saved in upfront installation costs from those participating in the program (this number represents the low end of savings as contracts continue to be signed). This is in addition to the federal tax incentive.

In terms of internal costs, these are extremely limited as Ms. Roth has taken the administrative and project lead for the Ann Arbor Solarize program.

Question: Does the City calculate and collect Cost-Per-Customer for programs like this? (Councilmember Hayner)

Response: The City does not collect information on the cost of each installation for each resident. However, we do work with the contractors to calculate the savings achieved through each Solarize event we administer. To-date, we know that the program has helped save at least \$250,000 in upfront installation costs for participants. This is in addition to savings residents achieve from the federal tax incentive.

Question: Do we have stats about the number of attendees at these events and the eventual resulting number of solar installations? (Councilmember Nelson)

Response: Yes:

- 9 Solarize events run
- 393 participants in the 9 events
- Over 500 people engaged through outreach events
- At least 107 solar arrays installed through the program (this number is the low end of installations completed as individuals continue to sign contracts)
- Over 700kWh of solar installed (this number represents the low end of installed capacity as individuals continue to sign contracts)
- At least \$250,000 saved in upfront installation costs from those participating in the program (this number represents the low end of savings as contracts continue to be signed). This is in addition to the federal tax incentive.

CA-11 - Resolution to Re-Authorize the City Administrator to Direct Purchase Natural Gas and Choice Electric for all Relevant City Facilities

Question: This was prepared by OSI. Are all city energy purchases made under the auspices of OSI? (Councilmember Hayner)

Response: OSI has employees with expertise in energy that coordinate with different departments making energy decisions for the City. We advise and help make energy efficiency and energy purchasing decisions on the choice market.

Question: Is there a way to use this resolution encourage the purchase of the right types of energy, i.e. Green natural gas or renewable -only energy? (Councilmember Hayner)

Response: The resolution is purposefully written to allow for flexibility when it comes to what type of energy is purchased, allowing space to procure renewable energy.

C-1 – An Ordinance to Amend Sections 5.16.6 and 5.18.4 of Chapter 55 (Unified Development Code) of Title V of the Code of the City of Ann Arbor (Solar Energy Systems; Exceptions to Height Limits)

Question: The changes to rooftop solar energy systems appears to apply only to flat roofs. Should we also define a height limit or height variance for structures with pitched roofs, which also can have solar installations. (Councilmember Hayner)

Response: This could be considered. It was not included as part of this proposal as staff has not experienced as many conflicts with solar installations on pitched roofs. Staff's experience is that typically when solar panels are mounted on a pitched roof, it is typically done so within the height requirements.

Question: At Energy Commission this was discussed because it had not come before us, despite clearly being related to Energy in the city. I have shared this resolution with the group for their instruction and comment. If EC members decide they want to seek changes, would a resolution to refer this back to EC be appropriate? (Councilmember Hayner)

Response: Planning staff presumed that these proposed changes to enable additional solar installations would be generally supported by the Energy Commission. If the Council seeks the advice of the Energy Commission prior to any action, then postponement to enable this review and comment would be appropriate. The next meeting of the Energy Commission is December 8, 2020.

Question: What is the significance of 12 feet in this amendment? Does it relate to a standard dimension of a solar panel or does it relate to the specific site that prompted this amendment? Would the Zoning Board of Appeals be an alternate path for exemptions like this? How does the cost of filing with the ZBA compare to the cost of submitting a site plan review? (Councilmember Nelson)

Response: The 12 feet dimension was proposed from staff research which demonstrated it would accommodate the majority of such installations. The Zoning Board of Appeals could be an alternate path for height variation, but would require successful satisfaction of all variance standards. The cost of a Variance application is \$750 for one and two family residential or \$1,000 for other applications. Site plan review fees range from \$3,400 to \$13,350+, depending on the level of approval (staff to City Council). No site plan would be required to install solar panels on a rooftop if they met the ordinance height standards.

DC-1 – Resolution to Approve 2021 Council Committee Appointments

Question: There is no resolution to nominate and approve the assignment of mayor pro tem. Isn't it necessary to nominate that position before setting council assignments? (Councilmember Hayner)

Response: A resolution to elect the Mayor pro tem was added to the 11/16 agenda after this question was received. No particular order is required.

Question: Are the processes for amending and approving this resolution the same as any other council resolution? (Councilmember Hayner)

Response: Yes, under section 4.3 of the Charter, the election of the Mayor pro tem is by a vote of six members of the Council.

DC-2 – Resolution Directing the Planning Commission to Create a Transit Supported Development District

Question: Clearly this resolution is outdated and needs to be re-written. It is not based on the city’s history of change to our Master Plan and supporting plans. It even includes a resolved clause that has a passed date. “June 15 , 2020”. Should I submit a completely new resolution? (Councilmember Hayner)

Response: Attached is an excerpt from an October 2019 presentation to the Planning Commission that identifies sections of the City’s Master Plan that would relate to this proposed zoning district discussion.

Question: The city Master plan is referenced – which are the “certain transit corridors” that the Master Plan identifies for density (which streets)? (Councilmember Nelson)

Response: The City’s Master Plan provides several references to such consideration (a summary is attached to these responses). The City’s Master Plan identifies transit corridors generally (e.g. *Encourage transit travel by increasing development density within walking distance of a high capacity transit corridor*), and more specifically elsewhere (e.g. *Update the land use recommendations of the Master Plan to support increased density and mixed land uses in signature transit corridors.*)

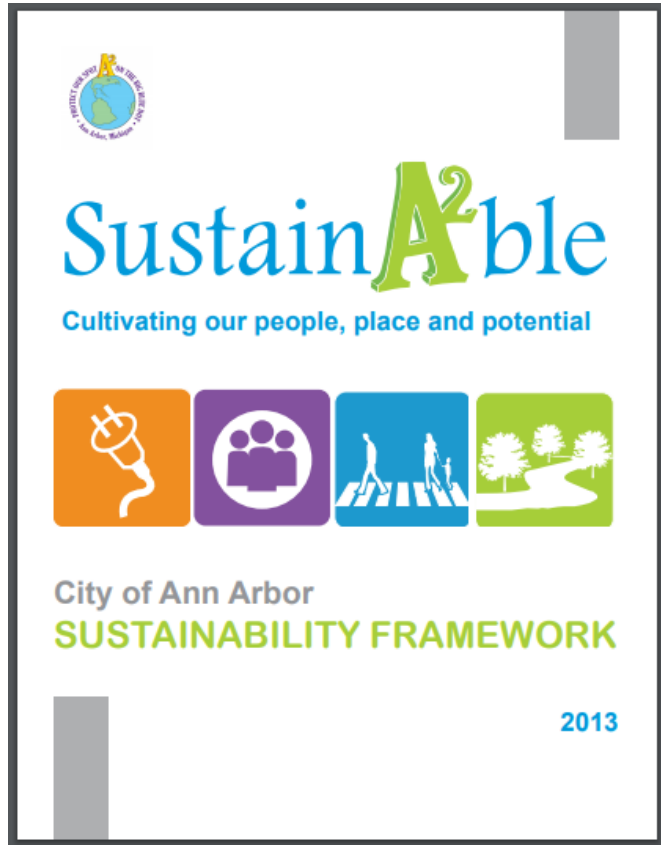
Scio Church Road (South Maple Road – Greenview Drive) Parking Elimination Postcard Response Summary

Mailing area addresses: 32
Postcard responses received: 17

This summary is a direct transcription of the postcard results and comments.

Scio Church Road Parking Elimination	
YES, I support the removal of on-street parking to accommodate bike lanes on Scio Church Road from west of Waltham Drive to Greenview Drive	6
NO, I do not support the removal of on-street parking to accommodate bike lanes on Scio Church Road from west of Waltham Drive to Greenview Drive	11
Not indicated	0
Comments received:	
Yes; Sounds great to us!	
Yes; Sure would be nice if the bike riders understood their responsibilities as cyclists and “rules of the road” vs. thinking they own the road and can do as they please.	
No; If this gets approved, homeowners should be compensated.	
No; Don’t need bike lanes on this stretch of Scio Church. I am a biker and never feel I need a bike lane here. Thanks!	
No; This is a major traffic route in & out of AA. Bikes can and do use the continuous sidewalk on north side of Scio Church which is fenced in & safe.	
No; If you add bike lanes they will not connect to any path on the west end. Until if the bridge gets widened the path stops anyway.	
No; Way too much congestion. Sad you took away one lane. Bike lane downtown ridiculous! Multi-use walk across street is dangerous no way out.	
No; If this is passed – limited (no overnight) parking after construction is completed on Waltham Dr. & Covington to Brampton Ct. to Saxon. Don’t want a parking lot in front of my home!	
No; This is our home. Where are visitors supposed to park? Emphatically NO!!!!	
No; Our home utilizes Scio Church due to our 4-house block – Old Pear Tree Ct. 2. During rush hour we utilize inside lane to reach our street. 3. Right turn lane at Maple is needed due to often long traffic lines. One traffic lane each way is unacceptable. 4. However well intended, a bike lane (little used) is not the answer. The “non-motorized goal” is for high density areas.	
No; Those of us who live on Scio Church would lose the only on-street parking.	

Master Plan Goals



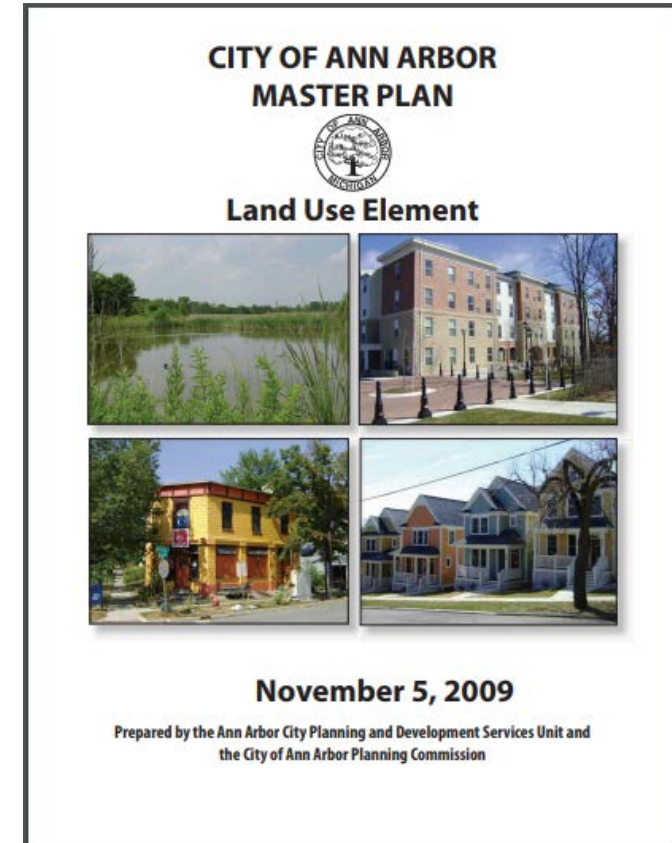
Sustainability Framework (2013)

- Organization of 20 years of planning into categorized theme areas
- 16 overarching goals
- 4 theme areas:
 - Climate and Energy
 - Community
 - Land Use and Access
 - Resource Management

Master Plan Goals

Land Use Element (2009)

- Community Vision *“...a dynamic community, providing a safe and healthy place to live, work and recreate. It will be a place where planning decisions are based, in part, on the interconnectedness of natural, transportation and land use systems”* [Page 5]
- *Integrating various land uses on the same site or in the same building encourages pedestrian activity, uses land and infrastructure more efficiently, increases vitality, promotes shared parking opportunities and can increase the variety of housing choices.* [Page 31]



Page 31, specific design principles that should be incorporated into commercial centers

Mixed Use Neighborhood Retail Centers – mixed-use neighborhood retail centers provide services primarily to the surrounding neighborhood. They should be designed as a complementary use to the neighborhood. Strip retail centers with large amounts of parking between the sidewalk and the storefronts are discouraged. The following are design principles that should be incorporated specifically into neighborhood commercial centers:

The size of off-street parking lots should be minimized. Unbroken expanses of parking are discouraged. On-street parking is encouraged to reduce the need for spaces in parking lots. Parking should be provided at the rear or sides of storefronts to encourage pedestrian access. A landscaped buffer should be provided between the parking lots and adjacent residential uses. The retail center should be designed in a manner where the parking lot is not the dominant feature from the road.

Office or residential uses should be provided above the store fronts to increase the variety of housing opportunities, encourage pedestrian access to the retail use, improve the viability of the retail businesses and encourage a village center. Single story retail buildings are not appropriate for neighborhood commercial centers. Setbacks should be minimized. Minimizing front and side setback allows for greater design flexibility, encourages the efficient use of land and promotes pedestrian access. Buildings should be fronted near the sidewalk.

The design should emphasize a village center instead of a strip commercial mall. Small tenant spaces should be included. Corporate design themes should be minimized. Individual stores, each with individual corporate design themes, is discouraged. Large signs and freestanding signs of any kind are discouraged. Auto related uses such as gas stations, auto repair shops and car washes should be prohibited and businesses with drive-throughs should be discouraged to encourage pedestrian access.

The center should be designed to interact well with the surrounding neighborhood. Large walls around the periphery of the center are discouraged. Convenient pedestrian connections should be provided to the surrounding neighborhood. Lighting should be provided that is consistent with the pedestrian scale of the neighborhood commercial centers. Cobra head lighting should not be provided. Lighting should be confined as much as possible to the immediate area. Refuse should be stored in locations that minimize the visual impact to adjoining residential uses.

Land Use Goals, Objectives and Action Statements

3 speak to a new zoning district for supporting a mix of land uses and density needed for premier transit service:

Goal B: To promote land use designs that reduce the reliance on the automobile. [p.35]

Goal C: To provide a full range of housing choices (size, price, design, accessibility, etc.) that meets the existing and anticipated needs of all City residents. [p. 35]

Goal E: To encourage commercial and employment centers that promote pedestrian activity, de-emphasize the use of the automobile, and provide a sense of balance with the surrounding land uses. [p. 37]

Work Program

Highest priority work:

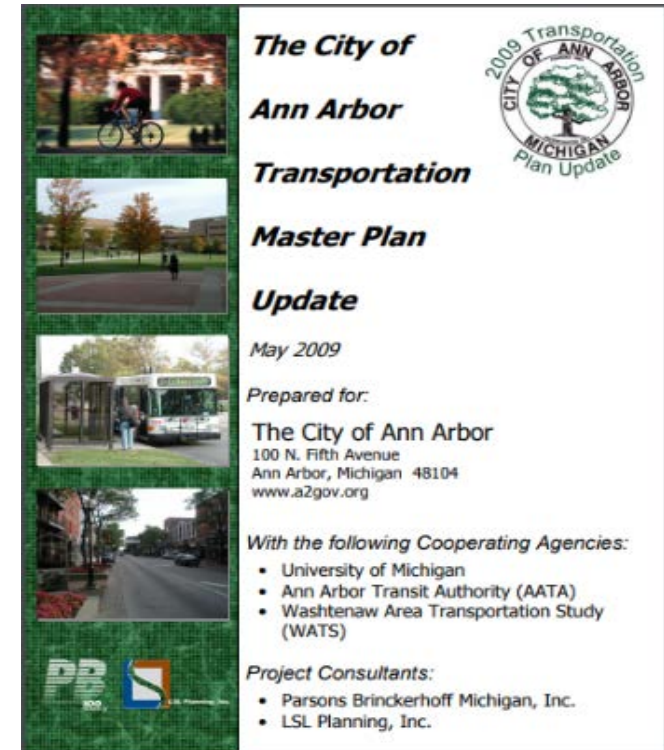
Work Program:

1. Develop regulatory incentives that encourage the reduction of impervious surfaces proposed with new development (structured or below-level parking, multiple-level buildings, “green” rooftops, etc.).
2. Develop regulatory incentives that encourage the enhancement of natural areas on sites proposed for development (i.e., removal of invasive species and the introduction of native species, restoring a wetland, improving floodplain function, etc.).
3. Develop regulatory incentives, such as density bonuses, for developments that provide affordable housing units.
4. Revise code to reduce minimum and establish maximum setback requirements in appropriate zoning districts to help shorten driveways and sidewalks.
5. Zone all University of Michigan-owned land to “Public Land” (PL).

Master Plan Goals

Transportation Master Plan Update (2009)

- A guide for improvements to the City's system of roads, sidewalks, paths, bike lanes, and public transit for the next 20 years. (p. 1-1)
- Vision of "an integrated multi-modal system that will build upon the unique qualities of each part of the city." (p. 1-2)
- Promote a transportation system supportive of and integrated with land use decisions. (p. 1-2)
- Philosophy to improve safety, reduce emissions, and reduce congestion not by widening streets, but through a series of transportation improvements and policy changes. (p. 2-1)



Recommendations for Land Use (p. 1-6)

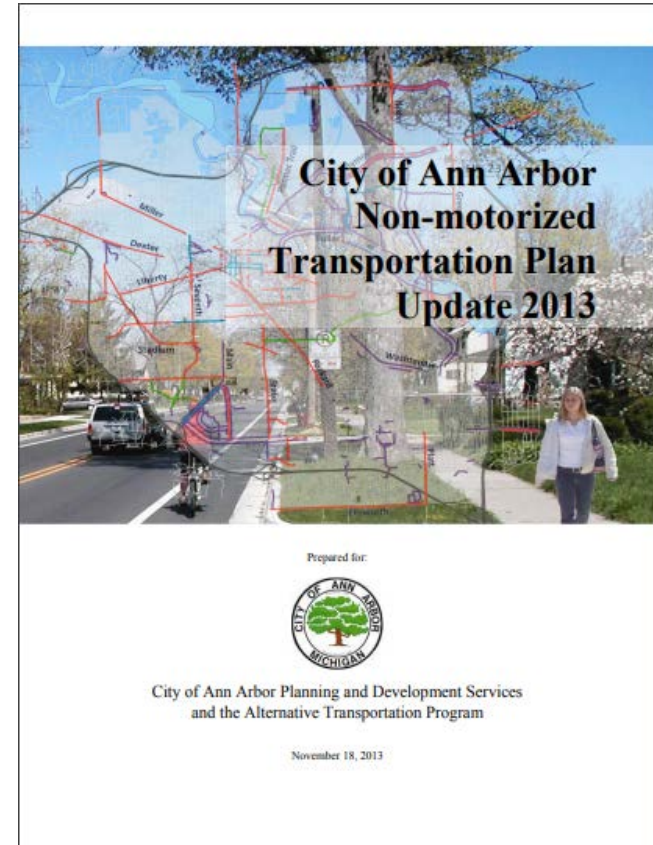
LAND USE

- Update the land use recommendations of the Master Plan to support increased density and mixed land uses in signature transit corridors
- Create transit-oriented development overlay districts for signature corridors, to incorporate tools such as density bonuses, design guidelines and building form regulations to guide redevelopment
- Amend the Traffic Impact Analysis requirements of the Land Development Regulations to allow trip reduction factors for site design that incorporates plan recommendations
- Evaluate the potential for designating signature transit corridors as receiving zones for a transfer of development rights program
- Incorporate into the zoning ordinance form-based regulations that support transit and active transportation, such as parking lot placement and build-to lines
- Coordinate land use planning with adjoining jurisdictions and County agencies to extend opportunities for transit-oriented development on key transit corridors outside of the city

Master Plan Goals

Non-Motorized Transportation Plan Update (2013)

- Intended “to help Ann Arbor once again become a national leader in high quality non-motorized transportation and contribute to keeping Ann Arbor one of the best places to live and work in the country.” (p. 1)
- Goal to “incorporate non-motorized best practices into all relevant policies, and all aspects and stages of planning available to the City and its partner organizations.” (p. 6)

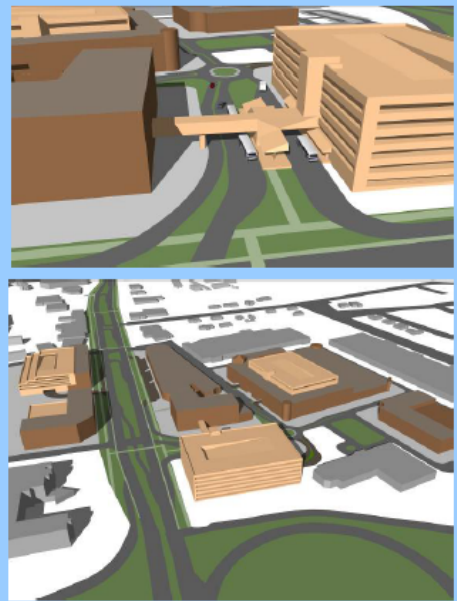


Non-Motorized Transportation Plan Update (2013)

But rather than contentment with those improvements to transit already under development, this Plan proposes a more varied transit system, possibly with new types of transit service along “signature corridors” to link key destinations in the city. A separate transit feasibility study is recommended to evaluate options for additional transit such as more frequent bus service, street cars or bus rapid transit for those corridors. Among the factors that will be considered are potential ridership, benefits to economic and environmental sustainability and financial feasibility.

One approach to support viable transit, especially along those signature corridors, is for more transit-friendly land uses and design, sometimes called Transit-Oriented Development or Transit-Oriented Design (TOD). Ann Arbor already has many transit-oriented areas – downtown, U of M campuses, some compact neighborhoods. But there are opportunities to gradually make those signature corridors more transit friendly through the following actions:

- Use zoning to restrict additional development of auto-related design such as gas stations, office buildings, or large shopping centers with large amounts of parking in the front. Instead, zoning should encourage more compact development, with buildings closer to the street to increase traveler choices by making it more convenient for walkers, bicyclists and transit riders.



This Washtenaw/US-23 interchange area simulation illustrates one land use-transportation intensification concept with infill development designed to support increased walking, biking, and transit use with multi-story, mixed-use buildings, structured parking, and integral transit facilities.

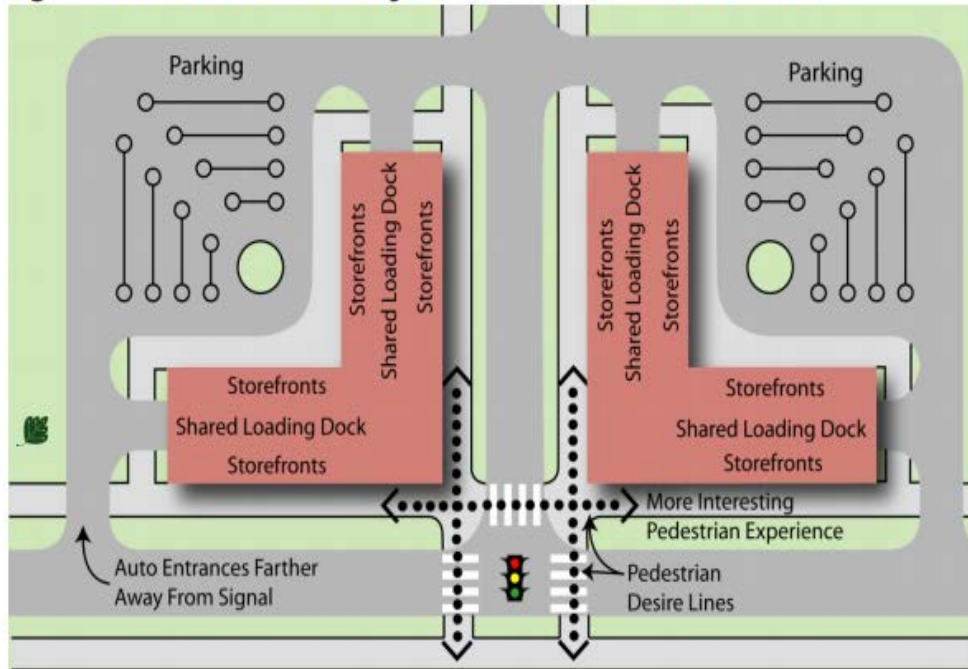
- Provide an inviting environment for walking with pedestrian-oriented design. That would include buildings closer to the street, streetscape amenities, and convenient pedestrian connections between uses and transit stops.
- Promote residential and employment densities that support transit for development and redevelopment. This could mean minimum heights rather than maximum heights, and mixed use rather than single-use developments (example, a multistory building with commercial on the first floor and offices or residential above instead of single-story commercial).
- Decrease required parking needs as transit availability increases at each location. Parking could be located in the rear, sides or even in parking structures to make development more compact. Employers could offer incentives to encourage employees to use transit rather than park on site.
- Use zoning revisions through a corridor overlay district or a more “form based” rather than “use based” approach to support transit, along with walking and bicycling. A model overlay TOD zoning district is included in Appendix A.
- Use density bonus incentive in City code for developments within ¼ mile of transit routes.
- Promote transit corridors as an attraction for employers looking to locate in the city, as a way to accommodate new employees and visitors without increasing congestion, emissions and other environmental consequences of single occupant auto travel.



A mid-block pedestrian crossing, shown above, is one example of a street design element that provides a supportive environment for pedestrians and promotes transit as a viable, safe option for travelers.

Recognition of Mixed Use Benefits, p. 91

Fig. 2.7B. Pedestrian Friendly Commercial Center Alternative



“While tying commercial developments to surrounding residential areas is a good practice, a better practice is to eliminate the segregation of commercial and housing areas.” p. 91