

City of Ann Arbor
301 East Huron Street
Ann Arbor, MI 48104

January 17, 2018

City of Ann Arbor Planning Commission:

I am writing in regard to the proposed Unified Development Code as part of the City's Zoning Ordinance Reorganization Project. I commend the city for pursuing zoning improvements that can result in clear, comprehensive and consistent land use plans and codes to guide and facilitate the desired future growth for the city.

By way of background, I moved to Ann Arbor in 1988 to go to graduate school at the University of Michigan. Like many others, I ended up staying in Ann Arbor and raising my three children here who went to Ann Arbor public schools. From 2004 to 2005 I served by appointment on the City of Ann Arbor Greenbelt Advisory Commission (GAC). Since 2008 I have served on the County Brownfields Redevelopment Authority (WCBRA). Both civic entities have complementary goals: protecting connected ecological and recreational corridors in and, importantly, around Ann Arbor—the goal of the GAC—is complemented, and enabled by promoting urban redevelopment—the goal of the WCBRA.

While my personal residence is no longer in the city limits, virtually every facet of my life is connected to the City of Ann Arbor. I own property in Ann Arbor and I spend most of my waking hours working and living in Ann Arbor. I think I finally qualify as an Ann Arbor “townie”.

I believe in the power of government to build just and sustainable societies. Professionally, I been in public service for more than 2 decades. If done properly, the City's ZORA project holds potential to facilitate engagement by citizens, business and civic organizations in helping to realize Ann Arbor's sustainability vision as outlined in the city's Sustainability Framework adopted by this body in 2013.

However, there is an element of the proposed Unified Development Code that concerns me: the proposed change in Floor Area Ratio calculations which would add areas like stair towers, elevator shafts, and ventilation shafts (which are actually not floor areas) to the total floor area of a building. Currently, those areas are not included in the Floor Area Ratio (FAR). Including these areas in the Floor Area Ratio would result in smaller structures, and therefore, less density in proposed development projects.

This change and appears to be inconsistent with the City's sustainability and urban redevelopment goals and indeed the purpose of the overall ZORA project to create greater clarity *and consistency* among the various planning and development policies.

More importantly, the proposed modification to the FAR could have harmful unintended consequences by deterring more dense development downtown and the associated opportunities for affordable housing—one of the biggest challenges issues facing the city. Also, as housing opportunities in the city diminish, or become too expensive, more pressure is put on outlying communities making it more difficult to achieve regional goals related to green space.

In sum, I do not believe the proposed FAR modification is consistent with or supports the city's greenfield, brownfield, or sustainability goals and I urge the city to exclude the FAR modification and from the new Unified Development Code.

Sincerely,

Victoria Pebbles
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