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**Sent:** Tuesday, April 18, 2023 10:11 AM  
**To:** Planning <[Planning@a2gov.org](mailto:Planning@a2gov.org)>  
**Subject:** Comment on TC1 zoning

Hello Planning Commission Members:

It has come to my attention that you are addressing TC1 zoning at this evening's meeting. I am, therefore, attaching a paper from 2019 regarding my concerns with this zoning. You can tell it is outdated because I still say "Master Plan", and at that time the Transportation Plan had not been ratified. Nonetheless, much of the content is still pertinent.

Also attached is a spreadsheet with details of cities employing Transit Zoning and a map of Ann Arbor if this zoning is adopted in all the suggested areas.

I realize that this is a process. The City first approved TC1 zoning on South State Street as a demonstration project to see if it could work as promised here in Ann Arbor. Before that area has even begun one single development to implement TC1, the City forged ahead to apply this zoning on West Stadium, and soon Plymouth Road.

My concern is that TC1 in Ann Arbor is still an idea and has not been implemented. There are many reasons to be skeptical that it will work as advertised in our City. Primary among them is the lack of a robust public transportation system. Even though there was a millage passed for AAATA, the service level needed for successful Transportation Corridor development is years away and even then it is doubtful. Given the amount of out-county residential development, traffic from commuters is only going to increase over time.

From what I have been able to glean from the actions of the Planning Commission and City Council over the intervening years since I first developed this paper, the City's vision for the future of Ann Arbor is one that includes high rise, luxury residential units from border to border. I would very much like to be mistaken.

Respectfully,

Julie Ritter

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That is fundamentally the only courage which is demanded of us: to be brave in the face of the strangest, most singular and most inexplicable things that can befall us. - Rilke

# The Complexity and Impact of T1 Zoning and Necessary Accompanying Transit System

The Ann Arbor City Planning Commission is studying T1 zoning with an eye to adopting it without public engagement or input other than at Planning Commission meetings. It was tabled for further study after the last public Planning Commission Meeting on October 1st 2019.

T1 Zoning would bring a huge change to the City of Ann Arbor.

T1 zoning would change the entire nature of the City of Ann Arbor. T1 zoning includes the height, use number and style of buildings which are developed throughout the city along designated transit corridors and “nodes”. T1 zoning in Ann Arbor, right now, without the addition of a more robust transit system, would greatly increase the number and frequency of cars and buses on principal Ann Arbor streets, including Packard, Plymouth, Washtenaw, Jackson, State, etc., . And parking would become even more difficult. The major impact on traffic and parking would not only be all along the T1 zoning routes, but also in surrounding neighborhoods, and downtown.

T1 zoning is much more complicated and impactful than simply a zoning change (for example single family housing to R4C). It is like a mini master plan in and of itself.

## What is T1 Zoning?

T1 zoning (Transit Oriented Development or TOD) was created with the purpose of achieving several city planning goals at the same time. It requires a dedicated transit mode (light rail, subway, bus rapid transit as examples) to service the stops along the T1 zoning corridor. The dedicated transit component is what allows this zoning to function. Goals include:

- Create dense development along the corridor
- Decrease automobile usage along the corridor
- Increase alternative modes of transportation along the corridor
- Help mitigate climate impact of new development by increasing density
- Create walkable neighborhoods along the corridor

Transit Oriented Development presents itself as a way to revitalize urban areas, stimulate local economy in vacant industrial zones and moribund residential areas. Ann Arbor does not currently require this kind of stimulation. T1 zoning would greatly increase the population of Ann Arbor.

Also, please note that providing **affordable housing is not included in these goals**. See “T1 Zoning and Affordable Housing” below for more information.

Five important things to know:

1. T1 zoning is not just along the street. It extends from ¼ mile to ½ mile from the center of the corridor or node in all directions. So for T1 zoning proposed along Packard and Plymouth Road

or Washtenaw, Eisenhower, Stadium any of these, this would impact the neighborhoods adjacent to these roads up to a half mile away from the corridor.

2. T1 is a mixed use zoning. Each building must contain more than residential units. It must contain other uses within.
3. The T1 zoning being proposed includes buildings of unlimited height! I.e. more than 30 stories is possible, no matter which neighborhood.
4. T1 zoning limits the amount of parking spaces in an effort to encourage people to take other transportation. In the case proposed by the Planning Commission, that would be one half parking space per unit. For example, a 50 unit building that includes 5 retail, office or other mixed use tenants and 45 residential units would get a total of 25 parking spaces.
5. T1 zoning is designed to work with a dedicated transit system, a light rail, commuter rail, monorail, or Bus Rapid Transit (BRT). It is NOT designed for the current bus service being provided by AATA. Without this dedicated transit system, the T1 zoning does not function. In TOD lingo, the community bus service of the AATA is referred to as a “feeder bus” or a “supply bus” in different places. It supports the transit system but is not the sole component. It is always partnered with Bus Rapid Transit (BRT), light rail, commuter rail, subways, ferries, all kinds of other things.

Robust transit, over and above a feeder bus system, is a necessity for T1 zoning. The zoning does not work without it. In T1 zoning, transit and development are two halves of the same coin.

T1 zoning is added after, not before, the transit system is in place.

Importantly: Each stop on the transit route is referred to as a “town center” or a “node.” At each “node” for a transit stop along any of the suggested routes the planning includes:

- Walkable design with pedestrians as the highest priority
- Train station as prominent feature of town center (in Ann Arbor, a bus station?)
- Public square fronting train station
- Contains a mixture of uses in close proximity (office, residential, retail, civic)
- High density, walkable district within a 10-minute circle surrounding train station
- Collector support transit systems including streetcar, light rail, and buses, etc
- Designs to include the easy use of bicycles and scooters as daily support transport
- Large ride-in bicycle parking areas within stations
- Bikeshare rental system and bikeway network integrated into stations
- Reduced and managed parking inside 10-minute walk circle around town center / train station
- Specialized retail at stations serving commuters and locals including cafes, grocery, dry cleaners

Main Downtown Transit Node:

In addition to all the “node” town centers, it includes a large, center-of-the-city train station (or bus station?) fronted by a public square. This does not exist in Ann Arbor and is not currently in the works.

## Where is T1 being used now?

T1 Zoning is currently being used in a number of cities. The Wikipedia page on Transit Oriented Development shows that all the cities listed are much larger than Ann Arbor, and have metropolitan areas that are orders of magnitude larger than Ann Arbor's.

In the United States, cities using this zoning share the following characteristics:

- Much larger than Ann Arbor and/or much larger metropolitan region in population and/or square miles.
- Regional transit (including but not limited to local bus service)
- Public transit services include either light rail, bus rapid transit or both, in addition to the kind of regular city bus service currently provided by AATA. And often additional services like trolleys or subways or even ferries.
- The public transit services of light rail and/or BRT are in place before the Transit Zoning is adopted.
- Many of these transit oriented development zonings are relatively recent (began in the last three or four years, or in the study phase now)

If you drill down through the large amount of information available online, the cost of the kind of transportation systems needed to support T1 zoning run to from tens of millions to hundreds of millions of dollars.

T1 Zoning is used concurrently with regional and local transit (as in, bus rapid transit, light rail, commuter rail or monorail) systems in addition to the simple city bus service we currently have in Ann Arbor. Again, Ann Arbor's bus system is not currently configured to service T1 Zoning.

Attached is a partially completed chart of cities that are currently using various pieces of this puzzle. This is being fleshed out as time allows, but even as is, it gives a good idea of the lay of the land.

First, a warning: This list may have some slightly outdated information, etc. depending on when census figures are available or updated. Anyone who would like to update this is welcome to do so. Just send me the updated information and I will change it. However, the information on this chart is generally descriptive of the details of population and physical area of the cities in question.

## Transit Requirements for T1 Zoning

Cities utilizing T1 zoning have transportation systems that include all four of the parts of the complete transit system that T1 zoning is envisioned to function within:

1. Regional transit (for example, southeast Michigan).
2. Local transit: bus rapid transit (BRT), light rail, monorail, commuter rail, that extends out of the city boundaries and interfaces with other regional transit to bring people into downtown without having to drive and park. In Ann Arbor's case this might include BRT, commuter rail, or some other transit to and from Brighton, Tecumseh, Chelsea, Plymouth, Detroit, and so forth.

3. Local “feeder” bus service within the city and perhaps close-by municipalities. Current AATA service.
4. Additional transportation modes: ride hailing, scooters, bicycles, walking, segues, skateboards both motorized and non-motorized, etc.

Ann Arbor has two of these parts:

1. Local Bus Service
2. Additional Transportation Modes

but currently lacks the other two

1. Regional Transit
2. Local BRT, light rail, etc. BRT would have to be built out.

## T1 Zoning and Bus Rapid Transit (BRT)

Some kind of larger and more efficient transit system (in addition to our AATA “feeder” local stop bus system) is foundational to the functioning of T1 zoning. In other municipalities this role is being filled by light rail, commuter rail, monorail, subways and/or BRT.

Bus Rapid Transit is being promoted as Ann Arbor’s way to enable the T1 zoning. This is a separate and perhaps even more interesting challenge

BRT raises the following issues:

1. It requires dedicated road lanes
2. It requires a large, center-of-city, multi modal depot to offload passengers
  - Where will this be located?
  - Who will pay for it, how?
3. If service is extended outside City Limits:
  - Will the County help pay?
  - Will other municipalities pay?
  - What if it is extended to Brighton and Tecumseh. Will they pay too?
  - Will the State support dedicated lanes to whatever surrounding municipalities are participating along 23?
  - How will BRT coming from outside the City be channelled into the City?
    - Along which roads?
    - These roads will need dedicated BRT lanes. Who will pay?
  - Washtenaw/Huron are Mdot Roads.
    - Will the State do all the work for dedicated lanes on these thoroughfares?
    - Will the city pay or will the state?

If a regional transportation plan is ever developed, this BRT will have to be integrated into the larger scheme.

## T1 Zoning and Affordable Housing

T1 Zoning does not automatically guarantee, or even pretend to offer, any affordable housing.

When Peter Calthorpe originally created the term Transit Oriented Development, one of his goals was to create a variety of residential opportunities. This has not worked out the way he envisioned. In fact, studies show that TOD zoning increases housing costs unless there are other governmental tools put into place, like mandates (which Michigan currently does not allow), premiums, or other forms of non-profit, foundation, etc funding.

Without these interventions TOD decreases affordability and displaces people previously living in the designated transit corridor. Business as usual, market force real estate development does not fill the need.

## Planning Program Conflicts

This proposal to adopt T1 zoning comes in the middle of two major planning initiatives by the City of Ann Arbor:

### The Transportation Plan

The Transportation Plan, which pays consultants \$600,000, is not finished yet, but is well along the way. The Transportation plan is working to respond to the request for proposal.

“The City of Ann Arbor is seeking a consultant to work with City staff and stakeholders to develop Ann Arbor’s 2018 Comprehensive Transportation Plan, to define, develop and recommend implementation activities supporting a Vision Zero approach to multimodal transportation systems planning, policy and programs.”

The RFP can be found here:

[https://www.a2gov.org/departments/finance-admin-services/purchasing/Documents/RFP\\_18-19\\_Document.pdf](https://www.a2gov.org/departments/finance-admin-services/purchasing/Documents/RFP_18-19_Document.pdf)

### The Master Plan

The Master Plan has been represented as meaningful engagement of all Ann Arbor citizens and other stakeholders to create an agreed upon list of values and a vision of the City they would like to see. It was also clearly explained that only after the Master Plan is developed and approved will the zoning and ordinances be changed to support the vision.

The RFP to find a consultant can be found here. Notice the title is “Community Visioning and Master Land Use Plan”:

[https://www.a2gov.org/departments/finance-admin-services/purchasing/Documents/RFP\\_19-06\\_Document.pdf](https://www.a2gov.org/departments/finance-admin-services/purchasing/Documents/RFP_19-06_Document.pdf)

And it’s addendum:

[https://www.a2gov.org/departments/finance-admin-services/purchasing/Documents/RFP\\_19-06\\_Addendum1.pdf](https://www.a2gov.org/departments/finance-admin-services/purchasing/Documents/RFP_19-06_Addendum1.pdf)

Nowhere in either of these RFP's is the T1 zoning addressed.

## So many questions!!

Where is the Community Visioning in this T1 Zoning Process?

Why is this being introduced now?

Who, besides developers, will benefit from this early adoption, without the transit pieces in place?

What will the impact be on traffic and parking within the City, especially before a BRT is in place?

Has anyone done a parking study? Parking in downtown is already terrible. The University lots are full.

The City lots are full. The street parking is full. The DDA gives out "Off Peak" parking to new developments but there is no longer any "Off Peak."

Stormwater Impact? The City is already suffering from increased precipitation due to climate change.

How would the immense amount of dense, "impervious surface" development unleashed by this T1 zoning affect stormwater run-off?

What about the other infrastructure components? Streets, water, power? Will these new developments be required to adopt 100% electricity for their operation of HVAC? Or will they still be able to use natural gas?

How will landscaping and public space design be integrated throughout the process so that heat islands do not evolve at the nodes and down the corridors?

## CONCLUSION

T1 Zoning is a massive zoning change for the City of Ann Arbor, particularly because of Ann Arbor's small size and lack of adequate transit when compared to the other places who have adopted or are investigating adopting this zoning.

- It includes unlimited height development within ½ mile in all directions from each central corridor or transit node.
- It includes the building of "town centers" at each stop along the transit route. Each town center includes a station, a public open space, and retail services that cater to transit riders.
- It includes transit over and above local bus service. This comes in different forms in different cities (see partially completed spreadsheet) usually light or commuter rail, or bus rapid transit. Ann Arbor currently does not have accommodations for these increased levels of public transportation and they will have to be built out. For example, bus rapid transit requires dedicated road lanes.

**Most importantly:** T1 zoning needs its own process of public outreach, education and engagement. Since it has not been included in the Transportation Plan or the Master Plan, an additional consultant needs to be brought in to organize and carry out this kind of engagement.

All other municipalities that have adopted T1 zoning have first carried out thorough public outreach through a hired consultancy to collect information, engage with the citizens and other stakeholders, educate people as needed, and come to a conclusion. In a couple of cases it has tracked alongside the Master Plan but always had a separate process.

After these three plans are completed (hopefully with communication between the three and some agreement on the result):

T1 Zoning might be recommended and adopted. It is possible that after these plans are finalized:

- T1 Zoning will be welcomed as an appropriate zoning for the City.
- The BRT or other transit that is necessary for T1 to function, will be welcomed, completely fleshed out, and fully funded and with everyone's support before any T1 zoning is put into place.

For T1 zoning to be adopted, there must be a large public outreach and public engagement process. If and when the decision is made to adopt it, people who support it must know exactly what they are supporting, what the costs will be, who will pay them and how.

The two current City initiated plans must first come to completion. The alternative is simply to disregard them immediately.

For the Planning Department and Planning Commission to recommend this radical change in zoning, transportation and consequent functioning of the City at this point with these two City initiated planning processes is dismissive:

- It negates all the hard work of all the people involved in the Transportation Plan whether in the City, citizens, stakeholders or consultants, and the \$600,000 spent.
- It renders meaningless all the countless hours of work of the 13 member committee which has just finalized the choice of a Master Plan consultant, along with the time and effort of all the consultants who submitted packages in response to the RFP, and those who additionally took the time to come for interviews with the committee. And the City's \$500,000 plus obligation in this Master Plan.
- It excludes almost everyone in the City of Ann Arbor from the planning and decision making process of adopting T1 zoning. The scope of this change requires far more outreach, education and engagement than has taken place thus far. This is especially true due to the very large monetary investment that will have to be made to adopt this zoning.
- It betrays the Transportation and Master Plan efforts as nothing more than window dressing and performative inclusion. It renders both of these efforts a waste of time and energy.

## Constructive Suggestions

- Delay the consideration of T1 Zoning



- Participate in the Transportation and Master Plan Processes and learn the results
- Hire a consultant who specializes in T1 zoning to come in, study, engage, educate and recommend. Perhaps partnering with the two current plans, but not replacing them.
- Determine if T1 is the best solution at this time, or if there are better, more appropriate alternatives
- Study “Strong Towns” incremental growth suggestions and see if they apply better than T1 zoning.
- If T1 zoning is determined to be the best zoning choice, before it is implemented determine the transit solution and the costs and make those widely known and subject to voter approval.

## Challenge

Can anyone bring forward an example of any city

- the size of Ann Arbor
- with the same strong economy
- with no regional transit
- with only a local bus service

that has successfully implemented Transit Oriented Development including

- at scale affordable housing
- without any additional interventions like premiums, mandates or other forms of support?

For more information:

[https://en.wikipedia.org/wiki/Transit-oriented\\_development](https://en.wikipedia.org/wiki/Transit-oriented_development) check out the photos of tod, especially the very tall buildings in Hong Kong, keeping in mind the unlimited height zoning being proposed.

<http://tod.org/> again look at the photos along with the text.

Food For Thought:

Transportation technologies dictate the shape and size of cities

<https://www.citylab.com/transportation/2019/08/commute-time-city-size-transportation-urban-planning-history/597055/>

<https://www.bloomberg.com/news/articles/2018-10-10/why-public-transportation-works-better-outside-the-u-s>

Links

<https://www.citylab.com/transportation/2018/10/while-america-suffocated-transit-other-countries-embraced-it/572167/>

<https://www.ecosophia.net/the-arc-of-our-future/>

[https://www.newyorker.com/culture/dept-of-design/how-the-coronavirus-will-reshape-architecture?itm\\_content=footer-recirc](https://www.newyorker.com/culture/dept-of-design/how-the-coronavirus-will-reshape-architecture?itm_content=footer-recirc)

## Upzoning Articles

<https://www.transformca.org/transform-blog-post/what-will-it-take-get-upzoning-and-affordability-right>

<https://www.newgeography.com/content/006452-forced-upzoning-bad-policy-but-heres-how-we-can-mitigate-its-impacts>

<https://www.governing.com/topics/urban/gov-zoning-density.html>

<https://www.forbes.com/sites/petesauanders1/2019/02/22/maybe-upzoning-doesnt-always-lead-to-lower-home-prices/#3f4881c44dd3>

<https://capturedeconomy.com/upzoning-isnt-everything/>

<https://www.bloomberg.com/news/articles/2019-01-31/zoning-reform-isn-t-a-silver-bullet-for-u-s-housing>

## Sent To Group

<https://www.newgeography.com/content/006452-forced-upzoning-bad-policy-but-heres-how-we-can-mitigate-its-impacts>

<https://www.transformca.org/transform-blog-post/what-will-it-take-get-upzoning-and-affordability-right>

<https://www.newgeography.com/content/006452-forced-upzoning-bad-policy-but-heres-how-we-can-mitigate-its-impacts>

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<https://www.forbes.com/sites/petesauanders1/2019/02/22/maybe-upzoning-doesnt-always-lead-to-lower-home-prices/#3f4881c44dd3>

<https://capturedeconomy.com/upzoning-isnt-everything/>

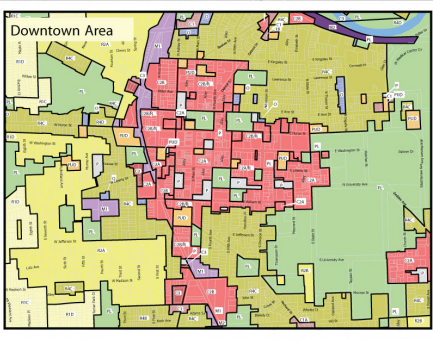
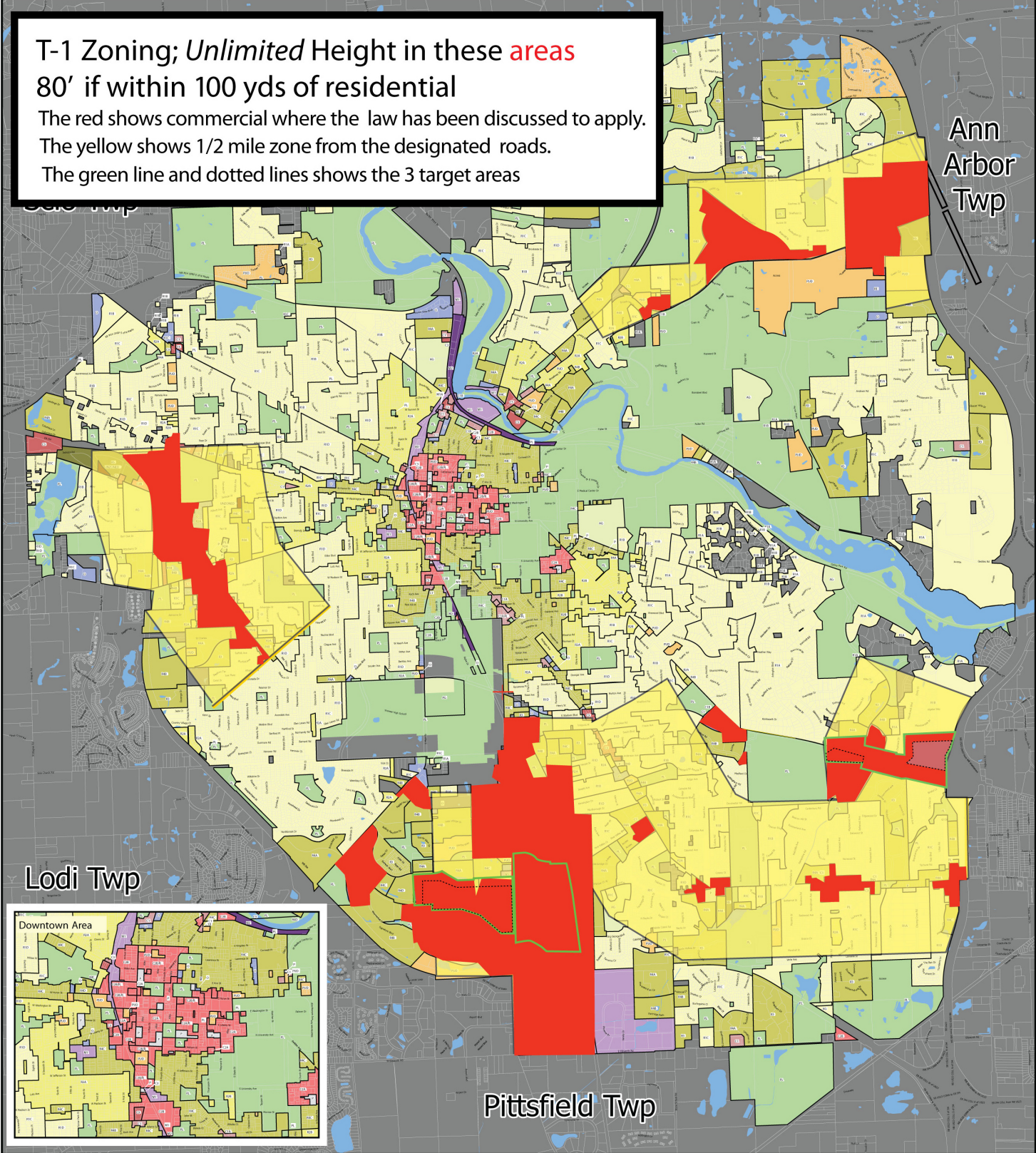
<https://www.bloomberg.com/news/articles/2019-01-31/zoning-reform-isn-t-a-silver-bullet-for-u-s-housing>

City	Population	Metro Area Population	Square Miles	Metro Area Square Miles	Light Rail	Bus	Bus Rapid Transit	Regional	Subway	TOD Zoning
Ann Arbor	121000	350000	28.77	706	no	yes	no	no	no	no
Atlanta	487000	5949951	134	8376	yes	yes	yes	yes	no	Launched in 2018 but \$15 million not enough
Arlington County, VA	234965	6216589	26	5565	yes	yes	yes	yes	yes	yes
Aurora	366623	2814330	154.1	397.06	yes	yes	no	yes	no	yes
Austin	950715	2168316	271.8	4278	yes	yes	yes	yes	no	in process
Baltimore	609841	2802789	92.28	598.3	yes	yes	yes	yes	yes	part of current master plan, not yet implemented
Berkeley										
Boston	698000	3200000	89.63	1422	yes	yes	yes	yes	yes	yes
Buffalo	261000	1134210	52.51	1565	yes	yes	yes	yes	no	plans and workshops
Camden	163776	1243879	10.34		yes	yes	yes	yes	yes	exploring potential
Charlotte	872498	2569213	297.7	3198	yes	yes	yes	yes	no	adopted concept in 2019. still in planning
Cincinnati	301301	2137406	201.8	4808	yes	yes	yes	yes	no	studies
Cleveland	385525	2057009	82.47	457.19	yes	yes	yes	yes	trolley	yes
Columbus										
Eugene	168,916	374748	43.72		no	yes	yes	yes	no	Plans started 2017. Hiring transit development planner
Dallas	1341000	7233323	385.8	9286	yes	yes	yes	yes	streetcar/trolley	yes
Denver	619968	2932415	155	4532	yes	yes	no	yes	no	in the planning phase
Detroit	673104	4304613	359.28	1337.16	Woodward trolley and People Mover	yes	no	no	No	Studies
El Paso	679000	840545	256.3		streetcars	yes	yes	yes	no	yes but "repealed in 2017"?
Houston	2430000	6997384	669	1660	yes	yes	being built	yes	no	being studied
Jersey City	270753	20300000	21.08	13318	yes	yes	yes	yes	ferry	yes
Kansas City	488943	2340000	319	7952	no	yes	yes	yes	no	yes
Kenosha	99877	in Chicago Statistical Area	27.03	In Chicago Statistical Area	yes	yes	yes	Limited	streetcars	yes, very new in last couple of years
Little Rock	198606	738344	122.02	4090.34	streetcars	yes	yes	yes	no	seeking money for study
Los Angeles	4000000	13131431	503	4850	yes	yes	yes	yes	yes	started 2017
Madison	255214	654230	100.9		no: suggested	yes	being planned	yes	no	Planning study in process
Memphis	652236	1330000	324	3013	trolley	yes	planned	yes	nite shuttle bus	Being studied



# City of Ann Arbor Zoning

**T-1 Zoning; *Unlimited* Height in these areas**  
**80' if within 100 yds of residential**  
 The red shows commercial where the law has been discussed to apply.  
 The yellow shows 1/2 mile zone from the designated roads.  
 The green line and dotted lines shows the 3 target areas



**Map Features**

AG (Agriculture-Open Space)	C3 (Fringe Commercial)	R1A (Single-Family Dwelling)	R4C (Multiple Family Dwelling)
C1 (Local Business)	M1 (Limited Industrial)	R1B (Single-Family Dwelling)	R4D (Multiple Family Dwelling)
C1A (Campus Business)	M1A (Limited Light Industrial)	R1C (Single-Family Dwelling)	R5 (Motel-Hotel)
C1A/R (Campus Business/Residential)	M2 (Medium Industrial)	R1D (Single-Family Dwelling)	R6 (Mobile Home Park)
C1B (Community Convenience Center)	O (Office)	R2A (Two-Family Dwelling)	RE (Research)
C2A (Central Business)	ORL (Office/Research/Limited Industrial)	R2B (Two-Family Dwelling)	Unzoned
C2A/R (Commercial/Residential)	P (Parking)	R3 (Townhouse Dwelling)	Township Parcels
C2B (Business Service)	PL (Public Land)	R4A (Multiple Family Dwelling)	Rivers and Lakes
C2B/R (Business Service/Residential)	PUD (Planned Unit Development)	R4B (Multiple Family Dwelling)	

0 0.25 0.5 1 1.5 2 Miles

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