

Subject: A2N2 response to statements by CM Disch and Planning director Lenary
Attachments: A2N2 parks memo 6-30-25.pdf

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Sent: Monday, June 30, 2025 4:31 PM
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Subject: A2N2 response to statements by CM Disch and Planning director Lenary

On behalf of the Ann Arbor Neighborhood Network, please find a memorandum that responds to statements and claims made by Councilmember Disch and Planning director Brett Lenart on June 27-28, 2025.

Sincerely

Steering Team of the Ann Arbor Neighborhood Network



MEMORANDUM

TO: Councilmember Lisa Disch; Members, Ann Arbor City Council & Planning Commission

FROM: Brad Pritts, Christine Crockett, Jeff Crockett, Richard Dokas, John Godfrey, Lisa Jevens, Irma Majer, Ellen Ramsburgh, Tom Stulberg, Michael Watts, Hank Barry

DATE: June 29, 2025

RE: Response to False and Misleading Statements Regarding Parkland Data in the Draft Comprehensive Land Use Plan

This memorandum responds to the demonstrably false and misleading statements made by Planning Manager Brett Lenart and Councilmember Lisa Disch on June 27-28, 2025. Their coordinated effort to defend the indefensible—the use of incorrect parkland data in the draft Comprehensive Land Use Plan (CLUP)—fails to address the substantive issues raised by the public. Instead, it has introduced a series of factual errors, logical fallacies, and disingenuous procedural claims that obscure the truth and insult the intelligence of Ann Arbor residents.

The facts remain undisputed. The City of Ann Arbor's officially adopted 2023-2027 Parks and Recreation Open Space (PROS) Plan inventories **2,210 acres** of parkland, yielding a service ratio of **17.96 acres per 1,000 residents**.¹ The draft CLUP, however, uses an incomplete and outdated third-party dataset to claim the city has only **1,726 acres** of parkland, artificially depressing the ratio by 22% to **13.9 acres per 1,000 residents**.²

The explanations offered for this discrepancy are not credible and concerningly erroneous. Their responses represent an after-the-fact justification for a decision that appears to be a deliberate, strategic maneuver to devalue our public parks, reduce developer contributions, and create political cover for disposing of parkland through 99-year leases—a loophole that allows the City to effectively sell parkland with only 8 council votes rather than voter approval as required by the City Charter.

Mr. Lenart's email to City Council attempts to provide technical justifications for using defective data. However, it is readily apparent that Mr. Lenart did not read TPL's [ParkServe Documentation and How-To Guide](#), which is cited in both A2N2's original memo, subsequent follow-ups, and website.

I: Correction of Planning Manager Brett Lenart's Email

Mr. Lenart's email to City Council is bureaucratic misdirection. It is riddled with factual inaccuracies in an effort to absolve the City of its fundamental responsibilities for assuring integrity of the data it uses.

1. The City's Claim: The data error is the fault of a third party.

Mr. Lenart claims: "TPL states their data was sourced from OpenStreetMap (OSM) in October of 2024...The City doesn't provide data to TPL..."³

The Facts: This is a misrepresentation of how the Trust for Public Land (TPL) operates. TPL's own 2025 Documentation states:

"In this initial database set-up, we contacted each city or town to request parks data and searched for GIS parks data resources on municipal and regional open data websites."⁴ ([Source](#): ParkServe Documentation 2025, page 4)

The 2018 ESRI article announcing ParkServe's launch further confirms: "TPL contacted each city, town, and community included in ParkServe via phone and email to request their parks data."⁵ **Mr. Lenart's claim that "The City doesn't provide data to TPL" is contradicted by TPL's documented outreach to every city, including Ann Arbor.**

- **Cities are the Primary Source:** TPL's own documentation and public statements confirm that its primary and preferred source for park data is the municipalities themselves.⁴ TPL actively solicits official GIS data from cities. When ParkServe launched in Spring 2018, "TPL contacted each city, town, and community included in ParkServe via phone and email to request their parks data. If no GIS-based park data was provided, the ParkServe team created data for the area based on available resources."⁵ ([Source](#): ESRI ArcNews Spring 2018) Each community was then given access to ParkReviewer, a web app to confirm and update their park data.⁵ That the city was aware of this responsibility is confirmed by an update it made to the TPL dataset in April 2021.
- **Ann Arbor's Data is Frozen in 2018:** The ESRI article announcing ParkServe's launch confirms that in Spring 2018, TPL created the initial dataset by contacting cities for their data. Cities that didn't provide data had their parks mapped from "available resources" by TPL staff.⁵ This explains why Ann Arbor's ParkServe map reflects what TPL could see from satellite imagery in 2018, missing major facilities like the golf courses. **The City had the opportunity to correct this data for seven years and chose not to.**
- **OpenStreetMap:** TPL does not source data from OpenStreetMap for their ParkServe tool. Mr. Lenart's claim that "TPL states their data was sourced from OpenStreetMap (OSM) in October of 2024" is false. TPL's documentation only mentions OpenStreetMap as an alternative data source for users creating their own custom network datasets, and identifying playground and amenities.⁴ Cities submit parks to TPL and then TPL manually reviews them using OSM data as one reference point for a specific thing. (Note: Mr. Lenart's claim is FALSE - TPL does not use OpenStreetMap it's primary data source)
- **Ann Arbor's Negligence:** The inaccuracy of Ann Arbor's ParkServe profile is a direct result of the City's own failure to provide a complete and updated data file. Blaming OpenStreetMap is an attempt to deflect responsibility for the City's own inaction. Since 2018, Ann Arbor has had continuous access to update its data through [ParkReviewer](#), yet has made only three minor corrections in seven years. The City is not a passive victim of bad data; it is the negligent author of it.

2. The City's Claim: TPL excludes golf courses based on a "formal recreation" standard.

Mr. Lenart states: "TPL applies criteria to their inventory such as 'encourage informal public use...' which could exclude golf courses as they are more 'formal' recreation sites."³

The Facts: This "formal" vs. "informal" distinction is a fabrication. It does not exist in TPL's published criteria. The City is cynically using TPL's brand to justify a policy that TPL itself would condemn. TPL's actual standard for inclusion in its dataset is any public park that:

"Encourage[s] informal public use (e.g., the public is encouraged to walk through and stay awhile)"⁴ ([Source](#): ParkServe Documentation 2025, page 4)

The guide explicitly states that exclusions are limited to:

"non-public parks in gated communities, **private golf courses**, publicly managed stadiums or zoos, and private cemeteries."⁴ (Note: Emphasis on "private" golf courses, not public/municipal ones) [emphasis added]

- **The Real Standard is Public Access:** TPL's documentation explicitly excludes *private* golf courses but includes examples of *municipal* golf courses that qualify because they allow public access, such as walking "around perimeter."⁵ Ann Arbor's courses, which are used extensively during the 4 ½ months off-season for walking, cross-country skiing, and sledding, clearly meet this standard.
- **TPL Actively Opposes Golf Course Conversion:** Most egregiously, TPL as an organization is a staunch defender of municipal golf courses as parkland. TPL runs a national program to help communities preserve golf courses as parks.⁷ In 2022, TPL opposed a California bill allowing cities to sell off this parkland because it "would

just empower more cities to... monetize the property as much as possible, even if that's not what the community wants."⁶ ([Source](#): SCGA letter of March 30, 2022 references TPL's March 16, 2022 opposition letter)

3. The City's Claim: No parkland is actually being "excluded."

Mr. Lenart states: "Is it accurate to describe the CLUP Plan as 'excluding' Parks acreage...? No...the PROS Plan remains in effect..."³

The Facts: This is deliberate misdirection that obscures a carefully designed procedural trap. The parks aren't being deleted today—they're being procedurally erased through a three-step process designed to circumvent public scrutiny. Here's how the manipulation works:

Step 1 - The Setup (2023 PROS Plan): The 2023 PROS Plan contains a critical admission:

"The development contribution formula will be reviewed by staff to see if updates should be made"¹

This language acknowledges the current formula uses outdated data (2000 census, 2011-2015 park inventory) and sets the stage for future changes.

Step 2 - The False Baseline (2025 CLUP): The CLUP introduces the false 13.9 acres/1,000 residents ratio using incomplete TPL data, then includes this mandate:

"Future updates to the Parks and Recreation Open Space (PROS) Plan should be [in] coordination with strategies of this plan [i.e., CLUP] to ensure alignment."²

As the city's highest-level land use document, the CLUP will dictate the terms of that "alignment."

Step 3 - The Lock-In (2028 PROS Plan): When the PROS Plan must be updated in 2028 (required by state law every 5 years), the "alignment" clause will be available to be used to force adoption of the CLUP's fraudulent baseline:

- Staff will argue the PROS Plan must "align" with the CLUP's 13.9 ratio.
- The false TPL data becomes the new official baseline of city parks.
- 484 acres of parkland are permanently erased from planning considerations.
- Developer contributions to parkland funds remain calculated at a lower level.

4. The City's Claim: Using the wrong data was not a "considered decision."

Mr. Lenart claims: "Was there a considered decision by the Plan consultants to rely on TPL data rather than PROS plan data...? No..."³

The Facts: This claim defies logic and contradicts the City's own contractual requirements.

- **Breach of Contract:** The City's contract with its consultant, Interface Studio, required them to "request, review, and base the plan on official GIS data and adopted plans."⁸ The 2023 PROS Plan is the City's official, adopted plan for parkland. The decision to ignore contractually obligated, official city data in favor of what they should have known to be incomplete or incorrect data from a third-party source is the very definition of a "considered decision." It is a considered decision to violate professional standards and contractual terms.
- **Methodical Misrepresentations:** Further, Lenart's lack of understanding of the TPL Methodology is self-evident when he states, "*We could run a similar analysis based on our own data if desired, and would be faced with creating similar methodology.*" The fact is that TPL's Guide provides step-by-step instructions on how to use its methodology independently which DOES include public golf courses, school parks, etc. ([Source](#): ParkServe

Documentation 2025 includes detailed instructions for custom analysis)

- Madison, Detroit, and Grand Rapids all update their TPL map quarterly since the TPL ParkServe dataset and maps were launched in 2018. [One can simply view the TPL map of Madison, WI](#) to see a best-practice example. This shows a stark difference with the TPL map of Ann Arbor which has seen just one minor update of three corrections in April 2021.

5. The City's Claim: Developer park contributions are merely "voluntary."

Mr. Lenart claims: "There are no required park contributions. For voluntary parks contributions requested of developers, the formula utilizes..."³

The Facts: This minimizes and misrepresents a critical funding mechanism for our parks.

- **A Standardized, Formula-Based System:** While discretionary, these contributions are an established and integral part of the development review process, governed by a specific formula in the PROS Plan designed to mitigate the impact of new development on park services.¹
- **A 22% Gift to Developers:** By slashing the parkland baseline by 22%, the City gives developers a 22% discount on their contributions. This represents millions of dollars in lost revenue for the parks system over the life of the plan—a cost that will be shifted to Ann Arbor taxpayers.

II: Correction of Councilmember Lisa Disch's Public Statement

Councilmember Disch's statement layers political spin on top of Mr. Lenart's flawed technical foundation. It is an exercise in damage control that further misleads the public.

1. The Claim: The staff email is a "straightforward explanation."

Councilmember Disch writes: "The Staff email...provides a straightforward explanation for the different calculations..."⁹

The Facts: The explanation is evasive, factually incorrect, and illogical. A "straightforward explanation" would have been a public admission that the City failed to provide TPL with correct data, that the CLUP used this incorrect data, and that it will be corrected. Instead, CM Disch deflected and refused to seek a correction.

2. The Claim: It's a "judgment call" to exclude the golf courses.

Councilmember Disch writes: "It was a judgment call—not an error or manipulation of data—to follow the TPL in leaving the two City-owned golf courses out of the total acreage..."⁹

The Facts: This was not a neutral "judgment call." Rather it is an admission that it was not the TPL that left out the missing parkland, it was the city. All available evidence indicates that this was a political decision that aligns with the publicly-stated agenda of city officials and that undermines all credibility of their public engagement process.

- **A Premeditated Agenda:** Councilmember Disch herself initiated the discussion of re-purposing the golf courses, asking at a public meeting on March 4, 2024: "Is it still possible to get the Comprehensive Plan team to consider what we might do with [the golf courses] other than what we are using them for?"¹⁰ This so-called "judgment call" is the implementation of that agenda previously discussed in City Council and Planning Commission meetings.
- **The Endgame: The 99-Year Lease Loophole:** This is the critical context. The City Charter Section 14.3(b) requires a public vote only to *sell* parkland—not to lease it. Notably, the word "lease" was deliberately removed

from the 2008 amendment before adoption. Under Section 14.3(a), the City can "lease any real estate... by resolution concurred in by at least eight members of the council." This means a supermajority of City Council can approve a 99-year lease—which is a *de facto* sale—without voter approval.^{11 12}

- **This is not theoretical.** In 2011, the City used this loophole to lease part of Fuller Park to the University of Michigan for a parking lot. (Note: Multiple sources document ongoing UM leases of Fuller Park for parking) In 2012, concerned councilmembers proposed requiring voter approval for any non-park use lease over 5 years specifically to prevent 99-year lease maneuvers, but this protection was never enacted. Councilmember Kunselman explicitly warned that a "99-year lease" of parkland would be an "outrageous" abuse that could happen with only 8 Council votes.¹²
- **They said it!** Planning Commission [Vice Chair Wyche's September 2024 suggestions](#) to "divest" so-called "unproductive" parks and create "opportunity zones" demonstrates the current strategy: parkland doesn't even need to be reclassified as "not parkland" to be divested. By administratively removing golf courses from the CLUP's parkland inventory, the City creates political cover for what remains a legally available maneuver. This is not a "judgment call"; it is a calculated political strategy to circumvent the spirit of voter-approved protections.

3. The Claim: This is merely an "apparent discrepancy."

Councilmember Disch writes of an "apparent discrepancy between two different calculations of City parkland acreage..."⁹

The Facts: This is not an "apparent discrepancy." It is the difference between right and wrong. It is a conflict between an **official, adopted, and correct** dataset (the PROS Plan) and an **unofficial, outdated, and incorrect** dataset (TPL). By framing this as a battle of equals, Councilmember Disch creates a false equivalence to obscure a simple truth: the City chose to use the smaller, inaccurate number.

Conclusion: An Unacceptable Breach of Public Trust

The explanations from city staff and Councilmember Disch are an insult to the public. They are a transparent attempt to cover for the decision to misrepresent the city's parkland assets in its most important planning document.

This is not a clerical error. The city's refusal to correct it points to this inescapable conclusion. Rather, it is a politically motivated strategy with highly significant consequences:

- It functionally erases 484 acres of parkland from the City's planning baseline.
- It's a sweetheart deal for developers, letting them save having to make substantial contributions to the public parks fund.
- It sets the stage to permanently lower Ann Arbor's parkland standards.
- It is a clear and direct threat to the integrity and spirit of the City Charter, creating a pathway to dispose of parkland without the consent of the voters.

We are not misled by claims of "judgment calls" or "different purposes." We see this for what it is: a profound and unacceptable breach of public trust.

The solution remains straightforward: **correct the CLUP to reflect the City's official PROS Plan parkland inventory of 2,210 acres, restore the accurate ratio of 17.96 acres per 1,000 residents, and ensure all future planning decisions are based on complete, accurate data.** The taxpayers who funded this comprehensive plan deserve accuracy and transparency, not deflection and data manipulation designed to circumvent voter-approved protections.

Further, the data was used during public engagement activities in tandem with a comprehensive plan survey that the City has now been forced to admit was "unscientific."

This goes beyond park policy—it raises serious concerns about democratic governance and ethics. When officials manipulate data and dismiss citizen oversight as "fake news," they are trying to intimidate and silence the public to whom they are accountable.

We recommend:

1. **Immediate correction** of parkland data in the draft CLUP and the TPL to reflect the complete PROS Plan inventory
2. **Public acknowledgment** of the data manipulation and explanation of how and why it occurred
3. **Outside professional review** of officials' and consultants' handling of this matter
4. **Transparency** in all future planning processes and negotiations regarding public land use
5. **Suspension of work on the Comprehensive Plan** until robust, effective public engagement has occurred and these fundamental issues are corrected

The residents of Ann Arbor deserve a planning process built on honest data and democratic principles, not one designed to subvert the public will through bureaucratic manipulation.

Respectfully submitted,

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Footnotes

- ¹ [City of Ann Arbor, *Parks and Recreation Open Space Plan 2023-2027*](#), at 17, 43–44 (Jan. 9, 2023)
- ² [City of Ann Arbor, *Draft Comprehensive Land Use Plan*, at 56, 67](#) (June 10, 2025)
- ³ [Brett Lenart, *Email to Ann Arbor City Council*](#) (June 27, 2025).
- ⁴ [Trust for Public Land, *ParkServe® Documentation and How-To Guide*](#), at 4, 26 (May 2025)
- ⁵ [Emmalee Dolfi & Gabriel Patterson-King, *Visualizing Park Access Around the United States*, *ArcNews*](#) (Spring 2018)
- ⁶ [Southern California Golf Association, *Letter of Opposition to California Assembly Bill 1910*](#), at 5 (Mar. 30, 2022) (citing Trust for Public Land's March 16, 2022 opposition letter)
- ⁷ [Trust for Public Land, *When Private Golf Courses Land in the Rough, Communities Can Tee Up Public Parks*, *TPL.ORG*](#) (last visited June 28, 2025),.
- ⁸ [A2PauseThePlan.com, *Memorandum to Councilmember Lisa Disch*](#), at 1 (June 27, 2025)
- ⁹ [Lisa Disch, *Facebook Post*](#) (June 27, 2025).
- ¹⁰ [Ann Arbor City Council Meeting](#) (Mar. 4, 2024) (video at 1:38:48).
- ¹¹ [Legislation Details \(With Text\) - PRS-231-15](#)
- ¹² [See Ann Arbor Chronicle, *Ballot Questions: Parks, Public Art Funding*](#) (Aug. 13, 2012).