

To the Comprehensive Plan team and Planning Commission:

As you begin to draft the new Comprehensive Plan, I want to provide one last round of feedback and direction. It cannot be overstated that we are in a severe housing crisis, which has compounding negative effects on our community's physical and mental health, economic strength, and environmental resiliency. The good news is that these problems, stemming from a lack of supply of housing at all price points, are entirely solvable by an ambitious, flexible, and data-driven Comprehensive Plan. Allowing Ann Arbor to *increase population density organically and without constraints* will address the housing shortfall, A2 Zero and Vision Zero goals, and improve municipal financial strength.

As noted in a recent [About Here](#) video, many cities in North America have started to respond to their own housing crises using well-established tools from urban planning literature - namely, upzoning much of their city. Unfortunately, many of those cities have not hit their housing supply targets. In order to successfully add more housing, upzoning must be accompanied by important changes in the details. While the Plan is not an ordinance, the vision must be sufficiently detailed to achieve its goals. Many reasonable people will have different views on what "low-rise residential" might look like, so the Plan must enumerate the ordinance details that have proven to generate additional housing. In my mind, the following details are critical to the success of the Plan. I've also outlined my feedback to the questions in the 01/23/25 meeting presentations.

- Unit limits
 - Unit limits are inflexible. A unit density limit of two allows two 6-bedroom apartments but not 12 studio apartments, despite the infrastructure and overall density requirements being pretty much the same.
- Lot sizes
 - Ann Arbor has a history of new zoning districts having unintended effects (or lack thereof due to poorly-formulated lot size limits).
 - Regulation here should enable flexibility and creativity in development, rather than forcing excessively large lots that are poorly utilized.
- Small parcel infill
 - A successful plan will allow small parcels to be creatively infilled, without requiring a developer to acquire and combine lots for years in order to meet project financing targets.
 - Height limits and setbacks are the most rigid rules and create problems on unusual sites and limit creative approaches to using space
- FAR
 - Instead, floor area ratio (FAR) is a better control of parcel massing
 - The worksheet attached is not representative. 410 N First looks dense/imposing, but has a bunch of [open space not shown](#) and a large central courtyard, which makes it only a FAR of 2.
 - 132 Hill looks very "neighborhood-scale," but still has large setbacks and significant land reserved for parking. Instead, all low-rise residential should allow a FAR of 2.0. Without parking minimums, many lots near walkable portions of the city could be only two stories tall while supporting multiple units on parcels of all sizes.
 - As an example, neighborhoods in Paris (the classic Ann Arbor example of the 'right' kind of density) are ~2.0 FAR with central courtyards
- Setbacks
 - Side setbacks result in large portions of land devoted to monoculture grass, often without allowing additional windows/light into homes
 - Side setbacks also ban townhomes (beautiful [Brooklyn brownstones!](#)) on separate parcels, which makes efficient walkability in low-rise neighborhoods extremely challenging.
 - "Party wall" agreements exist and are used extensively around the world to mitigate conflict between neighbors

- Minimum front and rear setbacks should be reduced in all districts significantly in favor of FAR limits.
- Character overlay districts
 - Attempt to capture and preserve in amber the ‘feel’ of neighborhoods that were built organically over time.
 - These specifications are excessively limiting and fail to hold a city’s vibrancy - people do that! If people (artists, parents, librarians) can’t afford to live here, we’ll lose that vibrancy.
- Mixed-used commercial should be allowed in all zoning districts
 - All commercial uses should be allowed in walkable neighborhoods (coffee shops, restaurants, child care, office space, etc.)
 - Noise and light ordinances should instead be used to control nuisances
 - Personal anecdote: the noise in my R1C neighborhood from Stadium and Jackson traffic and from lawn equipment is far louder and more annoying than the sounds from the nearby brewery, gym, and home-improvement store.
- Transportation networks
 - We must eliminate multi-lane roads if we hope to achieve Vision Zero and A2Zero - safe transportation is sustainable transportation is equitable transportation!
 - The city must proactively collaborate with AAATA and UM to convert extra general lanes to bus rapid transit (BRT) designated lanes.
 - Eliminate or delay requirements for carbon-neutral mass transit by 2030 - mass transit is already much more sustainable than cars, and [electrification costs conflict with service frequency improvements](#) that do more to reduce VMT.
- Mixed-use hubs:
 - Zoning should permit the market to determine what the highest and best use is for a former restaurant surrounded by surface parking
 - If the concern is residential demand dominating the market, then instead of limiting percentage land use for residential, enable ground-floor commercial (retail, office, etc.) with housing above - allow for very high FAR.
 - If State-Eisenhower is to become a core, then State St must be transformed with a road diet and bus-only lanes to help AAATA hit the 2045 plan of 10 min headways.
- Mixed-use Innovation
 - The picture example of “mixed-use urban form” in the presentation (pg 24) shows massive dedicated parking structures, an office building, and an apartment building.
 - The city has plenty of empty office buildings post-COVID that these UM startups could occupy.
- Mixed-use Retail
 - Zoning should not encourage car-dependent retail sprawl (just because it exists today, doesn’t mean we should encourage new high-speed ramps from highways into neighborhoods where community members live and shop)
 - TC-1 has been successful in preventing new suburban-sprawl strip malls, even if new developments haven’t been built yet (and the requirements continue to evolve, so developers are waiting to see what maximum efficiency can be achieved with the ‘final’ ordinance)
 - Under no circumstances should “single story infill” aka big-box retail be encouraged - they are a drain on city resources and block A2Zero + Vision Zero goals.
 - *“Ann Arbor’s retail centers are major contributors to the tax base”* but not on a per-acre basis! Headlee also prevents additional total tax revenue (even if the cherry-picked Brixmor example has a high, recently-uncapped taxable value)
 - If the zoning permits it, large surface parking lots will be converted to higher-value, multi-story mixed-use commercial/residential (Briarwood). We should enable higher density, larger tax base development.

- *Should we explore a land use ... that provides more flexibility/incremental investment in retail centers?* Yes, allow very high density - FAR of 15, and let the higher land value drive organic development
- Office of Economic Development
 - Should investigate and lobby for changes that require state law amendments, such as single-stair reform

Addressing concerns from the consultant team:

- Affordability and equity
 - *If Ann Arbor loses its non-residential tax base ...* because hypothetical startups can't find new office space that has instead gone to building dense housing, then those city service costs are distributed among more people, improving affordability.
 - *If Ann Arbor loses its non-residential tax base ...* because its largest employer (U of M) massively downsizes, then the right answer to managing future disastrous unknowns is a land-use plan that allows for market flexibility built on principles of sustainability (ie, multi-use, high density, car-independent transportation options)
- Impact on Sustainability and Equity
 - 80% of people working in A2 commute here right now. It will take decades to build enough housing for those people, and that reduces VMT.
 - Increasing density in the city will create more jobs to serve those additional residents (teachers, hospitality workers, tradespeople).
 - Let's allow housing for the nurses who exist and drive over an hour to work first before we worry about the theoretical reverse-commuting manufacturing worker
- *Bottom line: City needs to protect and grow the value of the non-residential base*
 - Between the health system and UM, we already have the highest density employment center in Michigan after downtown Detroit.
 - The non-residential tax base can grow - but not at the cost of housing the people who work in those businesses! Higher density and integration of commercial and residential spaces will enable affordable, sustainable, and equitable growth.

Thank you for your consideration, and I look forward to reading the first drafts of the new Comprehensive Plan.

Sincerely,
 Mark Scerbo
 5th Ward resident
 Steering Committee member