

MEMORANDUM



TO: Planning Commission

FROM: Brett Lenart, Planning Manager
Michelle Bennett, Principal Planner

DATE: December 16, 2025

SUBJECT: Planning Commissioner Comments: Staff Responses to Third Round of Edits for the Draft Comprehensive Land Use Plan

Staff compiled, filtered, and organized planning commissioners' third round of comments to streamline the conversation. During the Planning Commission's review on November 18, staff took notes and proposed edits where requested.

Categories of Edits Received from Commissioners:

1. Discussion – These are areas that staff would benefit from discussion with the commission for additional direction, explanation, and agreement. This is the expected focus for the review.
2. Staff Supported – These are changes that staff agrees to make. They are included in a separate table for visibility to the commission. There is enough guidance that staff can make the edit, but these are more than a factual correction; please review in case you feel something here needs to be clarified or discussed.
3. Factual – These changes correct a statement factually, add a citation, or similar simple changes that will be directed to the consultant.

2026 Timeline

The required Michigan Planning Enabling Act review period ends on January 5, 2026 at 9 am. Comments received after December 11 will be placed in the Planning Commission's January 6 agenda packet. At the January 6 meeting, the Planning Commission's final comments will be accepted for the fourth draft. The edits will be organized and sent to Interface Studios. Once the consultant determines the timeline to complete the edits, planning staff can select the date and issue notices for the public hearing. It is anticipated that the public hearing will be held in the second half of February. If Planning Commission recommends approval to City Council, a date will be selected and notices issued for the City Council meeting, likely for one of their March meetings.

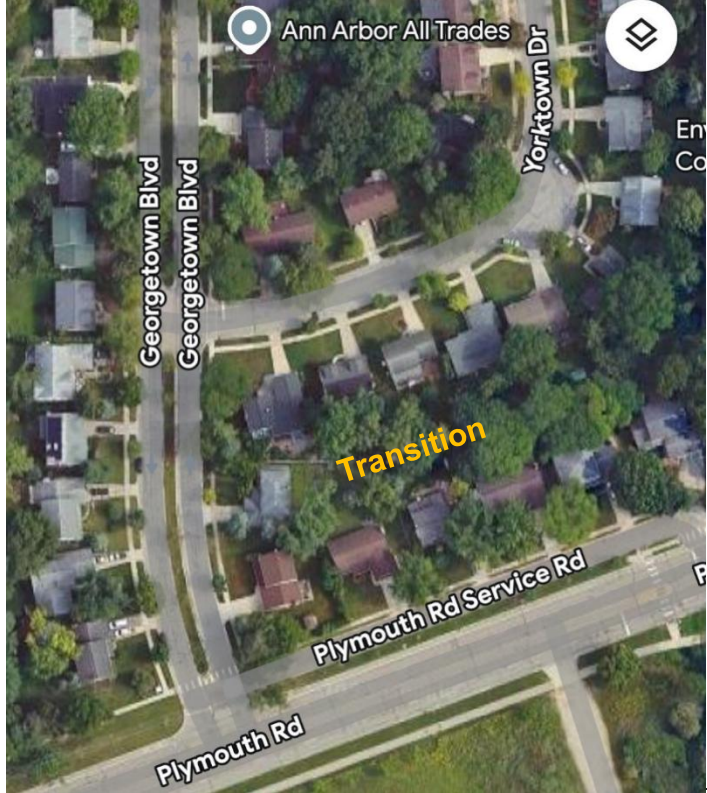
Discussion

Page	Edit	Rationale
57	<p>Remove the map</p> <p>Replace the second bullet point with the following: 91% of Ann Arbor residents live within a 10-minute walk of a city park. The National Recreation and Park Association (NRPA)'s 2025 NRPA Agency Performance Review indicates a national median of one park for every 2,411 residents. The City of Ann Arbor has one park for approximately every 755 residents – three times the national median. The NRPA also identifies a median of xxx acres per capita for comparably sized communities, for which the City provides YYY per capita.</p>	<p>STAFF edit: The parks department will start to update its PROS Plan in 2026 and feels that is the more appropriate document for a park access map. Similarly with the text, the categorization of community parks as five acres has been updated by the NRPA. The PROS Plan can explore in more detail how to discuss both of these topics.</p>
58	<p>Add the following regarding historic districts:</p> <p>The city currently has 15 designated historic districts. Each district was established pursuant to Michigan Local Historic Districts Act of 1970, state law distinct from Michigan's planning and zoning enabling laws, following extensive public input and deliberation required by that act. Historic districts serve to recognize and conserve structures within distinct areas that provide significant historical meaning and heritage reflecting the city's origins and early development. Any modifications to existing districts would require following similarly extensive public input and deliberation procedures. While not part of a local zoning code, historic districts function essentially as overlay districts, where the more restrictive requirements applicable through either zoning or historic preservation control.</p>	<p>Provide additional clarification regarding current city programs and efforts that the plan does not currently state and that I think this speak to concerns we have been hearing.</p> <p>Add all the language as proposed, but not on p. 58. Consider adding the background language to page 51 or 52. Work with staff and consultants to add into p. 52.</p> <p>STAFF: As for the page number, I think it makes the most sense on page 52 as a "key consideration" but if for formatting reasons, it needs to go on page 51 – that is fine too. This text is a response to "what we've heard."</p>

Page	Edit	Rationale
	<p>The city's historic districts are all located close to downtown. They are also predominantly if not entirely zoned for uses and densities greater than single family residential development alone, and duplexes and smaller multifamily housing units can be found throughout and immediately adjacent to them. In addition, because all were built prior to the city's shift toward larger minimum lot size requirements, the historic districts are some of the most densely developed and walkable neighborhoods in the city.</p>	
60	<p>Replace paragraph with sentence starting "Historic District boundaries..." with the following:</p> <p>This plan takes no position on the potential modification of existing historic districts or the creation of new historic districts. Historic district boundaries and requirements within them will continue to follow the standards and guidelines established by the Historic District Commission (HDC). The current multi-unit residences and mixed-use developments within the existing historic districts provide evidence of their compatibility within those districts. The city should support opportunities for increased missing-middle housing density within existing historic districts when and where appropriate, consistent with the goal of increasing such density throughout the city, and consistent with HDC standards and guidelines for modifications to existing structures and the development of new structures within historic districts.</p>	<p>Provide additional clarification regarding current city programs and efforts that the plan does not currently state and that I think this speak to concerns we have been hearing.</p> <p>Add this language to page 60 as preserved.</p>
60, 113, 116	<p>Draft 3 of the Comprehensive Plan includes language that limits by-right development of multifamily housing in Residential areas to duplexes (2 units) and triplexes (3 units). This letter</p>	<p>A 4-unit development can fit into the same building volume as a duplex or triplex. In other words, raising the number of maximum allowable units by right from 3 to 4 will not result in larger</p>

Page	Edit	Rationale
	<p>and the accompanying diagrams lay out the rationale for increasing that limit to quadplexes (4 units). There are also mentions of an intent to explore expedited permitting for duplexes and triplexes on pages 62 and 136. I propose that we revise the language to include quadplexes in each of these cases for the following reasons.</p>	<p>buildings (by area or height).</p> <p>It often makes more sense to divide a building into two symmetrical halves – 2 units, 4 units, 6 units, and so forth. A triplex makes sense as 3 stacked units, but it's also very straightforward to design a 2-story, 4-unit building that is appropriate in scale for Residential areas.</p> <p>The primary concerns from the public about increased density that have been communicated to the Planning Commission are related to area, height, and placement rather than unit count (i.e., How much bigger will these buildings be? Will they encroach on setbacks? Will they shade existing structures or solar arrays?) The implementation of the Plan can (and should) consider these factors, but limiting to an arbitrary number of units will not effectively do so. For example, we have many 6-bedroom units in this city. A triplex of 6 BR units will result in a larger building with more occupants than a quadplex of 3BR or 4BR units.</p> <p>Building sizes in Residential areas are currently limited by area, height, and placement requirements. These are effective tools and we should continue to use them, without placing an arbitrary constraint on the number of units at three.</p> <p>NOT SUPPORTED</p>

Page	Edit	Rationale
73	Last bullet point: “will likely need to be near North Campus.” – I’d still like to hear rationale for this assumption	<p>This feels potentially vestigial from the “innovation district” on Plymouth.</p> <p>Agreement on removing this statement. REMOVE</p>
111	On the Future Land Use Map, change the small section of Transition on Plymouth, that only includes Yorktown and Georgetown and bounded by Hub (now TC1), to Residential.	<p>This portion of the street is part of the contiguous Orchard Hill Maplewood Neighborhood Association. It is only about 8 to 15 R1C parcels that are not technically on Plymouth Rd, but rather, set back from the main road and on Plymouth Service Rd. Including this bit in Residential, rather than Transition, would match the treatment of the Nixon Service drive that is only about a 15 minute walk to the west and is already in Residential.</p> <p>The area of Yorktown and Georgetown was left out of TC1 when the area was last rezoned. For these reasons, continuity with the existing neighborhood, consistency with the treatment of Nixon Service Dr, and limited increased potential even if it were included in Transition, I recommend reconsidering the area for Residential or to the "to be determined" category.</p> <p>NOT SUPPORTED</p> <p>EDIT: Add the language from page 135 about how a FLUM is flexible as a footnote beneath the FLUM.</p>

Page	Edit	Rationale
		
112-113	Under Transition / Preferred Building Form – Bullet 1, delete “high-rise if adjacent to Hub” and Bullet 2, delete “and taller more intense near Hubs.”	<p>Unnecessary specificity that gives the wrong impression and can lead to misunderstanding. Not needed.</p> <p>SUPPORTED</p>
113	"Amend D-1, D-2, and TC-1."	<p>We should not be this prescriptive on how we execute Hub. It might be amendments to these legacy districts, but it can also be new districts. That's up to Council.</p> <p>Under the column that says “zoning” – it is not treated the same as the other categories</p> <p>Support for staff to come up with language that mimics the other comments for that column</p>

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		STAFF proposed language: New mixed-use district that permits greater densities and land uses to mimic an urban downtown format with improved safety and functionality for nonmotorized users
115-116 (added to discussion because two different commissioners proposed comments regarding dimensional standards)	<p>Staff question – do we want to use qualifiers like approximately and maximum regarding dimensional standards?</p> <p>115: Under Residential, rephrase – “Small-scale, approximately 3 and under” SUPPORTED</p> <p>116: In last bullet on the page, after add "maximum" before "building size" NOT SUPPORTED</p>	<p>The matrix on the previous spread uses the word “approximately.”</p> <p>This will make it clearer to residents what we mean here.</p>
118	Does the impact of short-term rentals need to be considered in other land use categories outside of transition? NOT SUPPORTED	<p>SUPPORTED Change on pages 108-109: Add paragraph short-term rentals under “New and Diverse Housing Options”</p> <p>STAFF PROPOSED: In 2021, the City updated the UDC requiring short-term rentals in residential zones be registered as the homeowner’s principal residence. The purpose of this regulation was to halt the conversion of homes into investment properties that would have the potential to take even more units off the market. Still, hundreds of homes in the City are used as short-term rentals that are reducing options for residents. Currently, the City is looking for tools to help monitor and identify short-term rentals. The findings can be used to determine how policy can be improved to meet our goals affordability through an expanded housing supply.</p>

Page	Edit	Rationale
138	Change implementation timeline to 1-3 years and/or adding more specificity to community land trust action item NOT SUPPORTED	This seems like something where there is broad community support that we should look at as soon as possible. CHANGE TO ONGOING
Came up during 11/18 meeting	Looking to change green uses on the FLUM for December 16.	NO COMMENTS RECEIVED BY CPC
Came up during 11/18 meeting	Want to make the data available like a dashboard or on the project page (hub) – metrics from the implementation matrix, and an annual progress report or some commitment to data accessibility (put in implementation matrix)	STAFF: Add this to the implementation matrix under 12.2
Came up during 11/18 meeting	Homelessness – supporting non-profits that work on this – Brett to write how we do this in plan with our tools	STAFF: On page 94 under 8.1, the last sentence refers to supporting the County to address homelessness. It is suggested to add “non-profits” to this sentence.
Came up during 11/18 meeting	Adopting more flexible ADU regulations	STAFF: Not necessary because there are many references to making missing middle easier to build, and ADU is included in that.
Came up during 11/18 meeting	Future Land Use Map is not well pixelated. Can it be fuzzier and higher quality? Could there be excerpts?	STAFF: Inquiry was made to Interface Studios for a clearer map. See packet.
Came up during 11/18 meeting	Outline the process through January/February	See first page of the memo.

Staff Supported Edits

Page	Edit	Rationale
Executive Summary - vi	Point people towards the research/data included in the Comp Plan (ex. "See page 14" or "See Appendix, Section 1")	People know where to look for more in-depth data + analysis of the claims made in the "Ann Arbor Snapshot."
Executive Summary - vi	Second to last bullet point – replace "the world is [in a climate crisis]" with "that we are [in a climate crisis]"	The crisis is here at home and not in some far off place. We are in it together. It's a small thing, but I feel it's important.
5	"The CLUP aligns with these plans"	Add years adopted for these 3 plans to align with the box above.
5	<p>I still find the language in the "Past Plan" section confusing. Suggestions for edits:</p> <ul style="list-style-type: none"> In the green box, change "Comprehensive Plan elements to be retained" to say, "The Comprehensive Plan will incorporate three existing plans:" In the yellow box, delete "Land Use" (which is consistent with the rest of the section) so the text reads "The Comprehensive Plan aligns with these existing plans:" 	We need to be 100% clear about plans that are being replaced, retained, and aligned with. These edits help clarify that and keep the language consistent. For example, on the next page the text reads, "Plans to Incorporate and Align With"; therefore we should use "incorporate" on page 5 instead of "retain."
18	Proximity to amenities: "Access to essential destinations is crucial for quality of life, but communities of color are more likely to reside in neighborhoods with limited access to groceries, parks, and schools." – people of color instead of communities of color	<p>I still think this needs to be changed and if not I want to talk about why not</p> <p>The words "communities" and "neighborhoods" in that sentence don't feel like they work together well</p>
35	<p>STAFF: First bullet point in the "sustainable" green box. Edit to read:</p> <p>More affordable housing density and to support increased public transit, allowing access to daily needs with less car dependence</p>	Clearer wording
36	Fourth bullet point: A little clunky – support of up to 4 units...per building? In currently zoned SF areas? Can't possibly mean in downtown too...can this be clarified?	Still confused – in Residential zoned neighborhoods?

Page	Edit	Rationale
59	The “Major walking barriers” in the map are incorrect.	There are multiple streets highlighted that are NOT at least four lanes (as the key suggests). Examples include parts of W. Stadium Blvd, Dexter Ave, and S. Main St.
60	<p>Under Strategy 1.1, 2nd para, revise last sentence to read: "The city will need to review and rewrite the zoning code and also streamline the development review process to support affordability goals, more easily develop “missing middle” housing, whose production has declined over the past decade, and encourage alternative approaches to land use such as community land trusts."</p> <p>STAFF suggested edit: “...decade. One way to do this is to encourage alternative approached to land use such as community land trusts.”</p>	Staff rationale: Shortens the sentences and carries the same message.
63	Under 1.5 add “community before “land trusts” in second to last sentence.	CLT’s are a particular kind of land trust that’s focused on keeping housing affordable – and is distinct from conservation land trusts or title-holding trusts. CLT’s are more in the spirit of the Plan and this section, than an overall idea about land trusts.
64	Under Strategy 2.1, add a 3rd paragraph that offers CLT’s as an approach to income-eligible affordable housing and homeownership that preserves affordability.	Staff question: Does the Planning Commission want non-profit developers to be included in 1.1, 1.5, and 2.1?
86	The city has robust programs in place to conserve natural features during development and to increase overall tree canopy throughout the city. Under those programs, in some instances, development projects are modified to protect natural features, and in some instances natural features are removed to accommodate site development needs. When the loss of natural features is necessary, that loss is mitigated through site design features and new plantings, and the city’s tree canopy overall is being enhanced through the planting of new and mitigation trees.	

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86	Update header to read: "City Efforts to Protect Natural Features, Underway or Planned" Revise bullet #1, update to say: The 10,000 Tree Program, which has surpassed its distribution goal with 11,000 trees planted on private property to date. Revise bullet #10, update to say: The Greenbelt Millage, which protects surrounding farmland and the city's water supply	It's an eclectic mix of things and needs more clarity. The heading says, "City Efforts..." which would indicate they're current efforts underway, but the list includes things past and present tense so it's confusing.
98	Remove the term "critical" in reference to natural features.	"Critical" is a subjective term in conservation, and depends on multiple factors such as geographic scope, eco-region, conservation goals and more. What might be deemed critical by one observer or expert may not be deemed critical by another. As such, City staff recommend it be removed from the statement in Goal 10 and other references made to "critical" natural features throughout the Comprehensive Plan. If a qualifier is necessary, City staff would recommend using "high priority" or similar, as it can more readily be defined internally by City staff.
111	Change color for the toss-up (residential or transition) districts on map to be more intuitive	Color looks like a combo of residential and hub not residential and transition
112-113	Under Hub / Preferred Building Form – Bullet 4, delete "Prefer active first floor uses"	Refers to use, not form – and is repeated in the next column over.
113	Tapering for Transition should adjust short to tall based on distance to Residential, and tall to short based on distance to Hub. Page 118 contains better language on this.	We should be clear that the intention is to taper down to shorter heights as we get closer to Residential parcels, and to permit Hub level heights if adjacent to Hub.
Implementation Matrix	STAFF edit: Number the actions under each strategy	Easier to reference when progress is reported on
Housing Appendix	I think we discussed this at the table, but I think we need to move the housing research appendix link up.	It feels buried and hard to find.

Factual Edits

Page	Edits	Rationale
6	I still find the bold ALL CAPS very difficult to read. Can this please change to Title Case?	Readability
7	“acquisition” is misspelled	Typo
15	Blue text at bottom right, revise to say, “Ann Arbor’s current zoning ordinance, the UDC, has...”	Makes it clear that this is presenting current condition – not proposed; and also avoids using UDC since most people don’t know what that means.)
22	The charts at the bottom should separate the “If A2 were 40% of the county...” numbers at the bottom, using a break, color, or italics. Some way of differentiating those numbers from the data.	These numbers are not SEMCOG or US Census data. These numbers are a way of illustrating a point – that the declining % share of County population is due to constraints on new housing production, not on demand...)
35	Under “Sustainable,” third from the bottom, remove “Need for” so that it just reads, “Multimodal transportation and complete neighborhoods.” Bottom, re-word or remove “Concern about impact on affordability” (Suggested revision if you want to keep it: “Potential negative impacts on affordability.”)	Consistent with the rest of the list in answering the question, “What does having a more Sustainable Ann Arbor mean?” This list is supposed to answer the question, “What does having a more Sustainable Ann Arbor mean?” and it doesn’t make sense as written.
61	Errant bolding for “Fewer”	“F” can be unbolded
103	“Existing City Program” since 2 are in this box, should be programs?	Typo
74	Change BIPOC reference to the Appendix (page 74)	The original citation is already there.
154, Goal 11	“Guidance for private development as to how they integrate into the city’s SEU plans and where private development needs to carry the responsibility of clean energy on their own Developments”	Typo – missing a verb like provide
163	Form-Based Code is missing a word. First sentence should read, “...relationship between building facades and the public realm...”	Typo

