

## MEMORANDUM



TO: Planning Commission

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

DATE: July 1, 2025

SUBJECT: Planning Commissioner Summary of Comments: Second Round of Edits for the Draft Comprehensive Land Use Plan

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As we progress through each round of edits, staff sees its role as compiling, filtering, and prioritizing planning commissioners' comments to help produce a final plan. We greatly appreciate your attention to detail and dedication to this process. Please keep in mind that not everything submitted could be addressed. Below is a summary of how the comments were organized.

### Categories of Edits Received from Commissioners:

1. Discussion – These are areas that staff would benefit from discussion with the commission for additional direction, and/or explanation. This is the expected focus for the review.
2. Staff – These are changes that staff will 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.

Note that if suggestions were provided by commissioners but are not included on this list, it means that:

- Staff does not intend to pursue or make the changes because we are relying upon other input,
- Staff has determined that the comments are more stylistic than substantive, or
- Staff believes the change is not significant to the goals and direction of the plan.

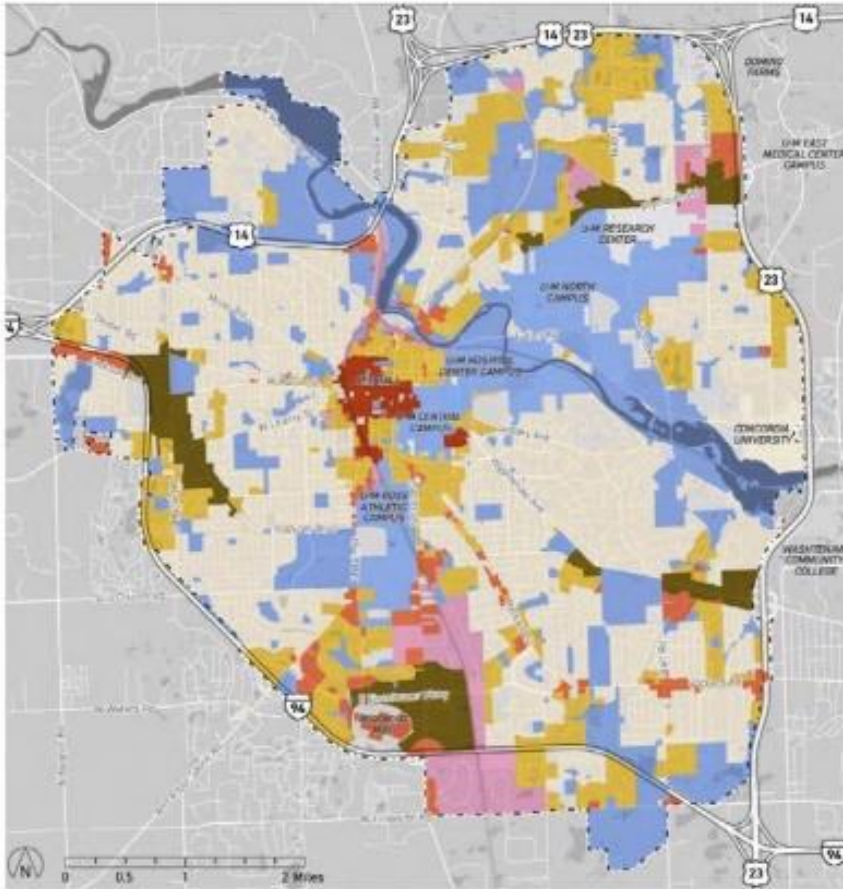
## Discussion

Page	Edit	Rationale
<b>Chapter 1</b>		
18	Final take on cartoons – keep or delete?	
18-19	Delete last sentence of first and third paragraph.	This is a goal/policy statement that should not be included here in a background/description section.
21	Delete: “Driving more property value out of commercial (office and retail) Real estate will be important to generate revenue that does not add to the burden on residential taxes.”	I don’t understand what this means or what we’re recommending here. If we’re saying, “we should try to maximize the taxable value of commercial real estate to offset residential tax burden,” then I agree in concept but don’t agree that the plan is an appropriate or even sufficient vehicle to implement that policy choice. This is also out of place in a section about the dependence of the city on the university.
21	This is problematic because it signals that land already developed is not available for redevelopment, which runs counter to the idea of promoting increased density by allowing--in some form and at least in some places--redevelopment of already developed land.	The concept presented here (that there is no-longer space for increased housing development by outward expansion within the city alone....I think) needs to be restated more carefully here.
<b>Chapter 2</b>		
38	Would it be possible to add a page regarding how the plan responds to these take-aways or how established Ann Arbor policy (like natural features, floodplain overlay, stormwater utility) addresses some of the concerns?	Environmental Commission Resolution to Council <a href="https://a2gov.legistar.com/LegislationDetail.aspx?ID=7421043&amp;GUID=60FA4F21-478E-467E-98F3-B4137BF8A4B7&amp;FullText=1">https://a2gov.legistar.com/LegislationDetail.aspx?ID=7421043&amp;GUID=60FA4F21-478E-467E-98F3-B4137BF8A4B7&amp;FullText=1</a>
<b>Chapter 4</b>		
52	If MFR occurred on all of these currently developable lands (given current regulations), how close would that get toward meeting the projected demand for additional housing (using the array of estimates of demand discussed in the background section above)?	This analysis is missing a key piece of information (not closing a loop that should be closed):

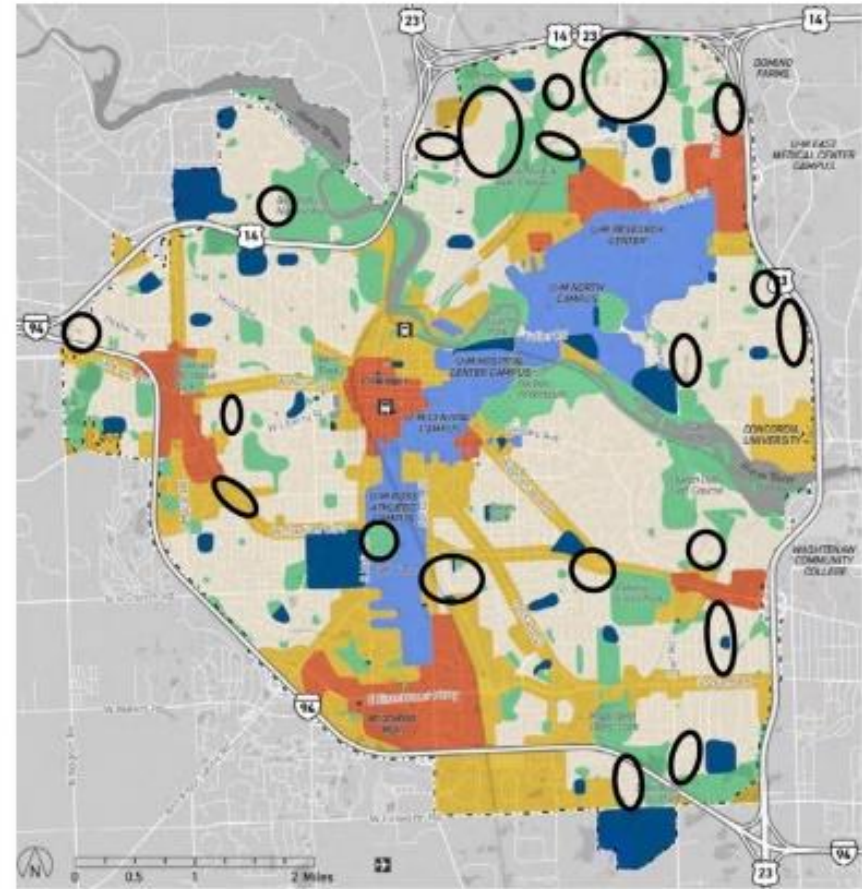
Page	Edit	Rationale
60	1.1, in title sentence and again in 1st paragraph – I still don't like the term "building form controls." We should either say, "form-based code" and include it in the Glossary (or at least a definition will show up if someone Googles it) or be explanatory, such as "Regulations that limit or control the form of a building can be used..."	"Building form controls" is not a professional or industry standard term and most people won't know what it means.
60	The city will need to review and rewrite the zoning code and also streamline the development review process to support affordability goals and more easily develop 2-unit to 4-unit housing ("missing middle"), whose production has declined over the past decade.	Provide empirical evidence that the Plan recognizes empirical basis of resident concerns, is responsive to what people have been asking for; and to anticipate discussion on p. 62 and refer to the appendix.
70-70	Delete: Goal 5.1 and all references/factual support for the policy goal of "diversifying the economy and tax base."	I previously requested to "remove emphasis on diversifying employment opportunities/tax base" and remove Goal 5 entirely. This economic diversification objective feels like a relic of earlier drafts that contained employment-biased zones. I don't think we can or should cut this entire section; there is content in here that we need to retain. But this needs to be significantly cut back. I've made several suggestions on what to remove below, but this might not be an exhaustive list.
86, 99 - (part of natural features discussion)	Can we find a place to insert a box to acknowledge and summarize the outstanding features of the stormwater overlay district, which is very strict (maybe p. 86) and similarly the natural features plan (maybe p. 99)?	
98-99 - (part of natural features discussion)	Natural Features Plan: I have read the resolution from the Env Comm which asks that we "incorporate" the NFMP into the Comp Plan. I note that they note that, "Currently, these specific Natural Features, Landmark (Heritage) Trees, Native Forest Fragments and Woodlands, Waterways, Floodplains and Floodways, Wetlands, Steep Slopes, and Endangered Species Habitats have some protections that are limited to projects that require a site plan," would there be a practical alternative to site plan as	Ensure protection of natural features beyond using site plans as a trigger.

Page	Edit	Rationale
	a trigger? If Comp Plan land use categories are implemented through zoning, would fewer projects than currently require a site plan? Is there anything on their list of potential tasks, e.g. the “work to complete and publish the Urban Forest Management Plan”? that could be stated as a suggestion in the Comp Plan?	
<b>Chapter 5</b>		
109	I’d like to discuss whether more of the areas currently zoned multifamily residential could/should be zoned transition.	Point of discussion, not advocacy
109 – see map submitted on page 6	I want to underscore that we should not be “down-zoning” parcels that are currently zoned R3/R4 and C to Residential (which will be a more restrictive zoning category). I request that we spend some time looking together as a body at these two maps in some detail so that we can address the disparity here and come to a resolution.	
109	Areas that have "Hub" directly adjacent to residential district... should all hub have some type of a buffer from residential district through transition?	
109	<p>The current draft downzones numerous existing multifamily and commercial parcels (e.g., South Industrial, Geddes Lake, Arrowwood) to “Residential,” limiting them to 3 stories.</p> <p>Similarly, parcels currently zoned TC1—like the Trader Joe’s area—should not be reclassified as “Transition.” And private land like Ann Arbor Golf and Outing should not be labeled “Park.”</p>	These parcels already have the infrastructure and transit access necessary to support more density. They should be designated “Transition” to reflect their potential for future redevelopment.

Page	Edit	Rationale
109	Reclassify the area on South Industrial from Stimson to just past Astor from Residential to Transition.	This is high density commercial and residential today that is bordered on three sides by Transition and Hub. Transition is appropriate here.
109	Reclassify the TC1 area on Stadium and Washtenaw to Hub.	TC1 is reclassified to Hub in other parts of the map. No reason to treat this high-density intersection differently.
110	Would it be possible to ensure that no streets consisting currently of parcels zoned R1 are zoned into Transition? (see p. 110: this is what the plan states; it seems that Brooks St was proposed for Transition in the first iteration—is that still the case?)	
112	I observe that D2 in some cases translated to transition and in others translated to Hub. Would it be possible to call this out in the box on p. 112 to underscore that all D2 has NOT been re-zoned to Hub, and that some current D2 was rezoned to “Transition,” which does not materially change the building typologies allowable for those parcels?	
<b>Chapter 6</b>		
132-133	How do these objectives line up with the listed Goals + Strategies in Chapter 4? How are they same/different?	It's confusing, however the metrics are very helpful, so I want to make sure those remain.
132-133	Would a good metric for displacement of locally-owned businesses be categorizing businesses by size and ownership to catch if the City is losing those?	
Implementation Matrix Goal 1	Calling out maximum square footage or limiting the footprint of any building (note, I didn't say dwelling unit, but the building overall) in low rise districts may go a long way in increasing comfort. If that graphic is reproducible, that might even be something to include.	Increase comfort
Implementation Matrix 1.2	Change infill guidelines development to “near term.” Aesthetic concerns should not delay needed housing.	Aesthetic concerns should not delay needed housing
Implementation Matrix 6.2	Strike promotion of incremental shopping center redevelopment (e.g. Arborland, Maple Village).	This perpetuates car-dependency.



Current zoning



Draft land use map, some differences highlighted

\*Submitted by planning commissioner. Note: current zoning should say “simplified zoning” – it does not represent every single zone, but rather condenses them into major land use categories.

## Staff Edits

Page	Edit	Rationale
Glossary of Terms	The last sentence of the “concentrated code enforcement” should be cited.	
3	The act requires that plans be updated every five years (w/ no legal enforcement mechanism), but that can involve simply revisiting conditions and concluding that nothing needs to be changed.	Not a recommendation, a requirement
5	Green box is still confusing. Eliminate subtitles: “Comprehensive Plan elements to be replaced” and “Comprehensive Plan elements to be retained.” Yellow box changes: edit subtitle, “Additional plans for alignment” to say: “The updated Plan will align with these 2 existing elements.”	Unclear what we are trying to communicate
6	Header: What are the bullets provided below? Were they taken directly from the documents, or are they summary bullet points crafted by the consultant?	Staff note: These are themes/values from the plan – could add a header to clarify
7	“Relevant themes from other plans” is confusing. Does that mean plans other than the five listed on page 6? If so, specify.	If “other plans” refers to the five plans being replaced, then they shouldn’t be listed as “other.”
14	Key information missing from this background discussion is some explanation of existing land use and zoning patterns. Specifically, how much of the city by land area is currently zoned solely for SFR, how much is zoned for mixed residential (multi-family and/or mixed use), and how much is zoned for uses that exclude residential (or otherwise are not available for additional residential development)?	That information is important for putting into context the discussion of housing needs and trends discussed below.
14	Current: “Since the 1970s, Ann Arbor’s population growth has slowed, even as the surrounding Washtenaw County continued to expand significantly.”  Revised to read: “Since the 1970s, Ann Arbor’s population growth has slowed, even as the surrounding Washtenaw County continued to expand significantly. This trend is	The causal link between legal limits on housing supply and the flattening out of Ann Arbor’s population growth is discussed on page 22. We need to pull that concept ahead to contextualize these population figures. We also shouldn’t shy away from making the causal link between legal restrictions on housing supply and the trends in Ann Arbor’s population growth; we have a

Page	Edit	Rationale
	closely correlated with and was caused by the depletion of the city's inventory of previously undeveloped land and the impact of legal constraints on new housing production within city limits."	robust record in support of that (intuitive) fact conclusion, and it is central to the policy recommendations later in the document.
15	Under "Housing Trends," we need to explain the seeming incongruity between flat population growth and increased housing demand.	Without it, this will be confusing for readers.
16 – Top Chart	Is there a way to break out "commercial" by apartments and whatever else is part of commercial?	It would be interesting to see what portion of commercial is actually housing Staff will determine if this is possible
19	Insert after the last sentence in the first paragraph: "In a 2018 survey of individuals commuting into Ann Arbor, a lack of affordable housing was '[t]he reason most often given for preferring to commute from a distance in spite of preferring a shorter commute.'"	Cite to: <a href="https://www.getdowntown.org/sites/default/files/2024-03/GetDowntown%20Commuter-employee%20and%20Decision-Maker%20Report%2C%202018.pdf">https://www.getdowntown.org/sites/default/files/2024-03/GetDowntown%20Commuter-employee%20and%20Decision-Maker%20Report%2C%202018.pdf</a>
22	The section explaining the context of the SEMCOG data is a good addition, but could more clearly emphasize the point, perhaps in bold text or a call out.	This plan intentionally removes constraints; new projections will exceed SEMCOG projections. In other words, we are not simply trying to accommodate the plateau that SEMCOG projects but reaching for greater population – in particular meeting the needs of the people who commute into A2 for work.
22	<p>Add after last sentence of first paragraph: "While commuting projections from different sources vary somewhat, all of those sources project that the number of daily commuters into the city will continue to be substantial."</p> <p>Add to the same paragraph: The SEMCOG population projections, therefore, do not reflect actual demand for increased population and residential housing development in Ann Arbor but rather bake in implicitly the assumption that existing constraints on new development through current zoning provisions will not be revisited.</p>	



Page	Edit	Rationale
	Add a 4th row labeled ~ "Potential Ann Arbor Population if constant 40% of Washtenaw County Population" to both tables	The numbers would help to illustrate the narrative.
23	<p>Current: "However, the Statewide Housing Plan falls short compared to the 2020 Housing Needs Assessment for Downtown Ann Arbor."</p> <p>Revise to read: "The Statewide Housing Plan targets simply apportion the state's five-year housing target--75,000 housing units—proportionally across Michigan cities and regions. These aspirational numbers do not attempt to quantify actual housing demand or needs in Ann Arbor and do not account for long-term shortfalls in local market rate housing construction. The DDA's 2020 Housing Needs Assessment for Downtown Ann Arbor provides a better indicator of the extent of Ann Arbor's housing shortage, which is acute."</p>	My understanding is that the state housing plan targets are just peanut butter spreading, in some proportional way, the state's 75k housing target across Michigan municipalities. That's a target, and a crudely set one at that, but it is not doing what the DDA tried to do, which is assess and quantify the local housing shortage or need. We should be explicit about the fact that the state's housing plan target is just a target; it is almost irrelevant in understanding local housing production shortfalls or actual demand for new market rate housing.
23	Not clear what this column means. If this is just the high end of a range of estimates, then it should be in the same column to the left and shown at 2,500-2,750.	
30, 44	Remove bold fonts	Feels like it's yelling at you.
32	Paragraph: add " modifications to statements of concepts and goals for further consideration in response to feedback already received.	
35	Remove or rewrite "Tax burden + landlord regulation" and "Distrust of developers and city government choices."	This list is supposed to be answers to the question, "What does having a more affordable Ann Arbor mean?" and these don't make any sense.
44	"Ann Arbor wants to grow": Is this a place to address how growth could benefit AA?	It seems odd to personify the City.

Page	Edit	Rationale
	I think this should read "wants to grow as a means to offer an ..."	I don't think anyone wants the city to grow for the sake of growth, and we're not increasing housing supply for the sake of growing, but allowing more growth as a way to do these other things.
46	At the end of second paragraph: At the same time, loosening concerns for the quality or fit of construction relative to the surrounding area could result in unduly cheap structures that will not stand the test of time.	Need to strike the balance that way too. I'm not sure if this needs to be mentioned here, but wanted to state that point.
47	Should we direct them to the appendix for support for the claim that "building more housing supports affordability in the long run by easing pressure on supply"? And should we add this phrase, "In cities that are highly sought after as employment centers and for their high quality of life, building more housing..."	In such cities, supply does support affordability; in other places affordability may be a problem of people having lower than average incomes.
47	<p>The Solarize program has added solar capacity in residential neighborhoods</p> <p>Suggested call-out box: Since its inception in 2019, Solarize, Ann Arbor's Community Bulk-Buy Solar Program, has installed over 3.9 MW of rooftop solar on roofs in R1/R2 districts. This saved the 526 participating households a total of \$1.8 million upfront solar costs and a projected \$17.4 million in energy costs over the lifetime of the system. Residents have expressed concerns that increased building heights will compete with this initiative by shading rooftop solar units. Although the experience of other cities suggests that effects of shading are minimal, the Plan should aim to minimize zero-sum tradeoffs between valued goals. Capping height at three stories in the residential category (just 5' over the current 30' height limit) is one important step in that direction which should be followed by further steps in the zoning phase.</p>	<p>The Plan can acknowledge that adding height in those neighborhoods may in some instances compete with that equipment and that the zoning phase should aim to minimize zero-sum tradeoffs between competing values.</p> <p>Details from OSI.</p>
47 – second paragraph	"Placing too many conditions on housing production, while good intentioned, makes it more difficult to build in a cost-	I don't think we can always assume placing conditions is good intentioned

Page	Edit	Rationale
	effective manner and undermines the actual development of housing.” Cut “while good intentioned”	
52 – first bullet	Housing development, last sentence – Why doesn’t stagnant growth mean that there is no demand?	This explanation isn’t provided in any of the subsequent bullets and is critical to understanding the logic of the Plan.  See appendix.
52	Delete: “More recently, vacancy rates for rental are up to 6.6% and 6.9%. This reflects the recent increase in apartment housing, however, to maintain this vacancy level and positively impact the housing market continued construction is needed.”	Even if we wanted to use Costar’s numbers for some purpose, and I do not believe that we should, we can’t mix and match Costar and ACS estimates, which were prepared by different entities using different datasets and different methodologies, and then arrange these numbers by date to create the appearance of a trend of vacancy rates getting better as we add new housing to the market. The resulting “trend” is illusory; it is just differences in how the estimates were calculated. The ACS data doesn’t show a trend when you look year over year from 2022 to 2023. In the 2022 one-year estimates, the rental vacancy rate is lower (3.1%) than the rental vacancy rate in the 2023 estimates (4.9%). But the result flips with homeowner vacancy rates, which are higher in the 2022 estimates (1.1%) than in the 2023 estimates (0.0%).
52	EITHER CUT “housing growth should be 25-50% faster than household growth” or SPECIFY this EMPIRICALLY.	This paragraph is all about vacancy rates; it does not talk about household growth; if it is desirable to bring in the numbers about household growth, then let’s do it and also be more specific about what it would mean in terms of units/annually for housing growth to be 25-50% faster than household growth. This is an abstraction that’s hard to picture and fuels concerns that the Plan calls for overbuilding.
54 – bullet 1	Housing affordability, why are we using the average sales price, rather than the median? Also, in this context we	Median is a more accurate illustration of the affordability problem (and is more than \$500k).

Page	Edit	Rationale
	should define “home” – is this only single-family, or does it include condos, townhouses, etc.?	
59	Explain what the "Average Walk Score" is and what is considered a desirable score.	Context
60	“Historic district boundaries will be maintained” - recommend consideration of replacing the word "will" with "should"	I think we should be normative rather than prescriptive? Up to the rest of the commission.
60	Some place the point needs to be made clearly (if indeed it's true) that the housing crisis is such that relying on new/more dense housing through any one possible approach (e.g., public housing, CLTs, shopping mall redevelopment, upzoning SF neighbors) will not be sufficient, and that we will only make real progress by proceeding on all fronts.	
62	“However, zoning reform alone is insufficient to spur the development of “missing middle” housing; in addition to streamlining the development review process, the City needs to be willing to use available financial and other incentives to stimulate this type of construction.”	Specificity is better; good to acknowledge that there are financial tools that the City has not exploited to the fullest.
63	I thought we were going to include Community Land Trusts here (or in a different section).	Currently they’re not mentioned anywhere in the Plan.
66	Some place the point needs to be made that conserving natural features and protecting the environment needs to be contemplated in the context of regional natural features and environmental protection considerations.	Maintaining less dense housing inside the city for the sake of conserving opens space like lawns will result in the loss of additional regionally important open spaces outside the city to the extent that substantial numbers of Ann Arbor workers continue to live outside the city and commute in.
68	4.1 Partner with institutions to explore potential for disposition for underutilized space for housing development” – Disposition OF underutilized space? Would this be a land swap or city purchase or something? Let’s maybe say that instead of “disposition” – or maybe it’s just the clunkiness of the wording that’s tripping me up and not the actual word	“Disposition” feels like a negative word here for something that seems positive (housing!).

Page	Edit	Rationale
72	The city's economic development strategy, A New Approach to Economic Development, calls for economic growth and job creation to expand the tax base, business retention and attraction, and diversifying the local economy to build resilience."	<p>I do not agree that the NAED report calls for "economic growth and job creation to expand the tax base, business retention and attraction, and diversifying the local economy to build resilience."</p> <p>The document is over 80 pages long and mentions the word "jobs" only five times. "Diversify" or "diversity" is mentioned four times and always in reference to housing. In defining "Economic Development," it specifically states that the main focus on the report is not job creation and economic expansion but instead on land use and development: "While we mean the term broadly, throughout this report we will mostly be talking about the land development process since it is the most active engagement the city organization has with the local economy, and also the area of the city's economic development activity most in need of attention." It identifies four core values, none of which include commercial development or economic diversification, and recommends that city council adopt these four values "as priority directives, more important than any other competing city interests, and preeminent in our consideration of process improvements and changes to city ordinance." The NAED report recommends diversifying housing stock and expanding the tax base through "protection and growth of taxable land value," but is agnostic on whether the expansion of Headlee exempt tax base comes through residential or commercial development.</p>
73	This is not an adequate citation for this statement	
79	5.2 - Do we have "Site Plan light" or proportionality to streamline process and adaptation in uses? I know former-Commissioner Sauve was a big proponent of site plan light and wanted to know if that had any additional consideration	For example, when I tried putting in garage doors for an office building, I faced a site plan amendment for modifying parking / driveway into the garage door... that triggered stormwater standards for the rest of the

Page	Edit	Rationale
	in the comprehensive plan... something that helps to bring appropriate proportional scale to improvements on an existing approved site plan.	<p>site that would cost \$500K+ for a \$20K door modification. I ended up not putting the tenant in and not doing the door. We should have proportionality, so we don't stifle progress - incremental is better than none. I would have paid an extra \$5K towards landscaping and retention improvements but not an entire site plan amendment with stormwater updates.</p> <p>Staff: References to a streamlined process could include this</p>
79 – last sentence	“While residential uses will also be allowed in and around these types of uses, nuisance regulations should be reviewed to minimize complaints while prioritizing flexibility to allow for hybrid businesses and industrial-type facilities that ensure sustainable initiatives and equitable jobs can remain in the city.”	Undefined terms: what are sustainable initiatives, and what are “equitable jobs”? Does this mean ensuring that things like recycling facilities that provide jobs to lower skilled workers remain in the city?
86	Green box – It’s currently unclear what the items on this list are. Some appear to be existing programs or initiatives (such as Rain Gardener Program), but others seem to be strategies (such as “Develop educational materials...”)	Needs revision and clarity.
86	This call-out should also mention the city's floodplain management program	
88	Trees/canopy also provide substantial reductions in stormwater flows (and thus substantial stormwater management benefits)	
101	Image of freehand sketch at bottom of the page – what is this image of?	There’s no explanation of the district geothermal project in the Bryant neighborhood and it’s not obvious from looking at it.
109	Consider using the language of land use categories for the Plan to more clearly distinguish the Plan from the zoning that will implement it. “District” is a word associated with zoning.	Its relationship to these broad land use categories seems to be supporting the misconception that the plan proposes “one size fits all zoning.”
110	This needs to be labeled as a zoning plan and clarified how it connects to UDC changes	

Page	Edit	Rationale
117	This should be labeled more clearly as a conceptual diagram of a particular transect, one of many potential configurations.	Otherwise, it will be interpreted as a model to be followed strictly everywhere.
118	To “foster a neighborhood atmosphere”— any reason not to cut this? Or swap it for “low-density residential”?	As written, it seems to single out this land use category as a “neighborhood.”
122	Need to absolutely fold in residence-serving buildings/uses too, including grocery stores, drug stores, restaurants, maybe other small retail, so that the new residences in these big buildings can walk to those stores instead of having to drive across town to get what they need.	
123	Show at least one of the taller apartment buildings that have recently been built or are under development.	This set shouldn’t be so focused on mid-rise rather than high-rise.
126	Add the following sentence to the first paragraph under “Utility Systems”: “Many of these investments will be necessary in the coming years even if current housing and population growth rates hold steady and do not increase over the next decade.”	
132-133	I ask again why the goal of 140/year is the metric for income-eligible affordable housing?  Metric: “Increase tax revenue and millage revenue for affordable housing, parks, schools, transit”	Source?  Why are schools and transit in here as the City does not control them? Please state source.
Implementation Matrix 1.1	“Define some private multifamily development as a separate use class in campus-proximate locations to provide flexibility for student-oriented group housing flexibility” – I don’t see great rationale for this? I’d eliminate. Also, there is a typo.	Lack of rationale for including this in the Plan
Implementation Matrix 1.1	This item covers updating Residential zoning, but what about Transition and Hub and updating the UDC to describe their specificity?	I don’t see that anywhere in the matrix.

## Factual Edits

Page	Edits	Rationale
Glossary of Terms	Add to glossary: average walk score, bus rapid transit, Michigan Planning Enabling Act, SEMCOG, sustainable energy utility, unified development code	Not defined, shouldn't come before the Table of Contents
Glossary of Terms	Change definition to: Form-based code addresses the relationship between building facades and realm, the form and mass of buildings in relation to one another, and the scale and types of streets and blocks. The regulations and standards in form-based codes are presented in both words and clearly drawn diagrams and other visuals. They are keyed to a regulating plan that designates the appropriate form and scale (and therefore, character) of development, rather than only distinctions in land-use types. Source: <a href="https://formbasedcodes.org/definition/">https://formbasedcodes.org/definition/</a>	No need to refer to neighborhood character which we know to be dog-whistles for blocking development and increased density
Glossary of Terms	In the definition of “exclusionary zoning” consider adding “Refers to a range of policies—including restrictions on multi-family dwellings, large minimum lot sizes, limits on building height—that....”	“Range of policies” is vague, and it is important to make explicit the kinds of policy provisions that A2 has employed to exclude and that this CLUP seeks to remedy or strike down.
Glossary of Terms	“mom and pop” businesses: could this be changed to independent businesses?	Heteronormative phrasing
Glossary of Terms	Definition of “housing cost-burdened”: Please change “renters are typically more at risk....” To the following: “The term can apply to either renters or homeowners, although nearly half of all renters in the US count as cost-burdened as compared with under one-third of homeowners.”	“Typically at risk” understates the relative advantages of homeowners over renters. Here is the full quote: “In 2020, 49% of renters spent at least 30% of their household income on housing costs in 2020, compared with 27% of homeowners”; here is the website: <a href="https://www.prb.org/articles/u-s-housing-cost-burden-declines-among-homeowners-but-remains-high-for-renters/">https://www.prb.org/articles/u-s-housing-cost-burden-declines-among-homeowners-but-remains-high-for-renters/</a> original data source is ACS 1-yr data 2020.
Glossary of Terms	Definition of VMT: replace “by the end of the decade” with “by 2030”.	This document will have a lifetime beyond the 2020s.
Viii, ix, 27, 35, 69, 122	Remove All References to "Preserving Neighborhood Character. The phrase “preserving neighborhood character”	“Preserving neighborhood character” and “neighborhood character” have historically invoked



Page	Edits	Rationale
	<p>should be removed from the Comprehensive Plan because it is not a neutral planning concept—it is a racist dog whistle with a long and troubling history. While it may sound like a benign aesthetic preference, in practice it has consistently been used to uphold exclusionary and discriminatory housing policies.</p> <p>“Neighborhood character” has historically been invoked to resist racial integration, affordable housing, and the introduction of new housing types, especially multi-family homes. Across the country, and here in Ann Arbor, it became part of the coded language used to justify zoning rules that preserved racial and economic homogeneity. Whether through minimum lot sizes, bans on apartments, or downzoning, the goal was the same: keep certain people, often renters, lower-income families, or people of color, out of “desirable” neighborhoods.</p>	<p>resistance to racial integration, affordable housing, and introduction of new housing types (especially multi-family). Can be used to preserve racial and economic homogeneity. Language rooted in exclusion is not conducive to a plan welcoming new residents and meeting housing and climate goals. Neighborhoods are not museums. They should be allowed to change and grow over time, welcoming new residents and adapting to new needs.</p>
8	Add date ranges to sections 02, 03, and 04.	Even though they’re included in the map key on page 9, I think it’s worth repeating here for clarity
9	Map - the UM Golf Course is shown in the light brown, "Built 1980-Today". I think that golf course was built in the 1930's?	<a href="https://umgolfcourse.umich.edu/history/#:~:text=The%20University%20of%20Michigan%20Golf%20Course%20was,as%20one%20of%20the%20finest%20in%20America.">https://umgolfcourse.umich.edu/history/#:~:text=The%20University%20of%20Michigan%20Golf%20Course%20was,as%20one%20of%20the%20finest%20in%20America.</a>
12-13	Add image sources.	Plan should be consistent with sources and citations, ex: image sources are included on page 25 and elsewhere
32	The text at the left, “public input is shared” and “city leadership addresses public priorities” is confusing. Are things flowing in both directions, as the arrow suggests?	I can’t really figure out what this diagram is showing us!
33	Add in number of emails to Planning and Council and comments at public meetings.	Although there are overlaps, it is helpful to know how many people are also contacting us via email and public comment. It does have how many meetings we have had, but not how many people have shown up, which I think is helpful.

Page	Edits	Rationale
42	“Under Chapter 3: Vision and Values” – Add page references for “VISION” and “VALUES” (i.e., after VISION add “(see page 44)” and after VALUES add “(see page 46)”)	When I read it initially, I was looking at pages 42-43 for the Vision Statement and was confused.
43	Redo this diagram. The changing text sizes and fonts make it hard to read and visually messy. There are inconsistencies in the template (e.g., Why is “Goals and Strategies” over the line of the box, while the others are all inside their boxes?”) Also, it seems very redundant with the text explanation on page 42. A better strategy might be to just connect the paragraphs of text with a few arrows and delete this diagram.	Hard to read, redundant, and inconsistent.
46	The headline is still using circular logic (i.e., “Based on a value of affordability, Ann Arbor will strive to be affordable.”) Can we just say, “Four core values serve as the guiding principles of the plan:” and leave it at that?	
63	1.4 Middle of the paragraph states that the city “should” do something that IT IS ALREADY DOING re: improving LIHTC scoring. Please edit this.	We must take credit for the work that Jennifer Hall is already doing.
72	Principal Employers-2023  University of Michigan (including hospital) is more than 34,800 people  Total Ann Arbor Campus and Hospital in 2023 is 53,831 (49,355 if you exclude those who are also in the student category). So, to be more correct, remove the (including hospital or say excluding hospital). I don’t think anyone will necessarily agree on a specific number, but they should be within the ballpark and are not currently. I would list it as: Ann Arbor Central Campus: 32,356 University of Michigan Hospital: 21,475	Staff has reached out to SPARK and U-M to confirm numbers; the number is closer to 57,000 employees.
74	Correct typo: “material resources” not “materials resources” [definition of CE next to the graphic]	

Page	Edits	Rationale
84, 102	Missing a “that” - Plan for and invest in city services and infrastructure <b>THAT</b> can accommodate expected growth	Missing word
93	The map is missing a description of the Amtrak line in blue.	
96	Green box – Should use the full title, “Ann Arbor Moving Together Towards Vision Zero”	
102	Goal 12, missing a word?	
109	Future Land Use Map – missing Eberwhite Elementary	Should be dark blue “Public”
130	Change title to something like, “Implementation Factors to Consider”	It feels counter-productive to open the chapter with a list of challenges, and I don’t know what they are in “addition” to.)

## Copy Editing

Page	Edit
General	Oxford commas
General	Always capitalize Comprehensive Plan
6-7	All Caps is not accessible
General	TheRide and AAATA seem to be used interchangeably, sometimes just one, sometimes both...are they talking about the same thing or is one referring to something higher level? If it’s the same thing, can we use a consistent name? Even if it’s “TheRide/AAATA”.
General	Let’s find consistency with naming. For example: Domino's Farms not Domino Farms, University of Michigan Medical Center, not U-M Hospital Center Campus  Why do we keep referencing East Ann Arbor Health Center but not West Ann Arbor Health Center, even though neither are technically in the city? Also, they are “Health Centers” not “medical centers”