

Subject: Comprehensive Plan Suggestions

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Sent: Friday, July 25, 2025 6:04 PM

To: Planning <Planning@a2gov.org>

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Hello Planning Commissioners. Thank you for all your great work. I think you are on track to produce an excellent plan.

Suggested Final Tweaks

https://docs.google.com/document/d/1vLjokLiB80g_TDUuVSQxDudtUwUTfWem5gLsoyNVN9Y/edit?usp=sharing

Other Comments

1. How should the July council resolution be implemented?

https://docs.google.com/document/d/1Krr1dLclZdMiftlFfNUsRAhGBB_OJgN79FPDrT_gwC4/edit?usp=sharing

2. Should any R1 areas be in Transition?

https://docs.google.com/document/d/1uL1xZK0yZe7noFb--cstS6F_wZ5HDsJyF1CyBWhp__0/edit?usp=sharing

3. What is the difference between Hub and Transition?

https://docs.google.com/document/d/15h1v4DPd8OhCBEAD3SHfFB-n3ig4cJuXBo_phJYzx08/edit?usp=sharing

What is the difference between Hub and Transition?

Recent History

In the first draft of the Plan, The Transition district's height limit was capped, whereas Hub allowed highrises. The Transition cap was arbitrary and prevented highrises near central campus where they are badly needed. The commission removed the cap earlier this year.

Now, the commission is faced with the question "If Transition allows highrises when far from Residential, how is Transition different than Hub?"

A Possible Answer

Hub areas could have less strict tapering height rules than Transition. For example, height limits might start at a higher minimum and step-up more quickly.

This distinction would avoid downzoning areas that currently allow tall buildings near residential neighborhoods, like downtown. The justification for this difference is simple: Residents who have chosen to live next to areas that already allow tall buildings do not need to be insulated from tall buildings as much as residents elsewhere.

It's possible Interface created a Hub district to avoid downzoning. In their [first draft map](#), the Old Fourth Ward was marked Residential, and it probably felt wrong to downzone the Northeast corner of downtown by applying self-adjusting rules there. An easy solution to this problem is a separate Hub district.

Implications

If the purpose of the Hub district is to be less-buffered than Transition, there is no need to make sure every Hub area is separated from Residential by Transition. The whole point of the Hub district would be to not require this sort of buffering.

Summary

Most Important Suggestion

1. Remove the "Prefer active first floor uses" lines from Transition and Hub.

Other Suggestions

2. Avoid creating new land use categories.
3. Make it clear that highrises in Transition will be allowed "far from Residential" rather than only "near hub," so that highrises are not forbidden near Central Campus.
4. Make it clear that heavy industrial uses will not be allowed in Transition.

Details

Remove the "Prefer active first floor uses" lines from Transition and Hub.

Page 115 contains the following three bullet points under "Preferred Building Form" and "Building Uses":

► *Prefer active first floor on arterials*

► *Prefer active first floor uses*

► *Prefer active first floor commercial, particularly at nodes*

It is unclear what "prefer" means, but the most straightforward interpretation of these bullets is that they call for ground-floor retail and transparency requirements. A consultant hired to implement this plan would probably take that interpretation.

These requirements would forbid or restrict many critical uses in both Hub and Transition, like day cares, urgent cares, Planned Parenthoods, nursing homes, schools, and ground-floor residential in multifamily buildings. They would also make hundreds of single-family homes on arterial streets non-conforming uses.

I suggest removing the three bullets.



An urgent care on Stadium that would become a nonconforming use in the Hub district.



Homes in a Transition District on an arterial (Packard) that would become non-conforming uses.

Avoid creating new land use categories

At the last meeting, there was a suggestion that there might be parcels that do not fit into either the Residential or Transition category, and some sort of intermediate category might be needed.

I think if you look closer, you will see that every parcel in question fits into either Residential and Transition, and it is not practical to create an intermediate category, because there is no gap between Residential and Transition.

Residential allows low-rise buildings with a limited mixture of uses. Transition allows low-rise buildings near Residential districts and incrementally taller building elsewhere, with a broader mix of uses. I don't think there are any practical possibilities in between those two concepts. They are right next to each other on the density spectrum.

The only necessary task at this stage is determine which parcels should be limited to 3 stories with stricter rules for commercial uses (Residential), or not limited in this way (Transition). The exact height formulas are beyond the scope of this plan. The question of whether a HOA or

condo association is likely to redevelop is irrelevant, because the commission's task is to create rules for what is legally permissible, not guess what is likely to happen.

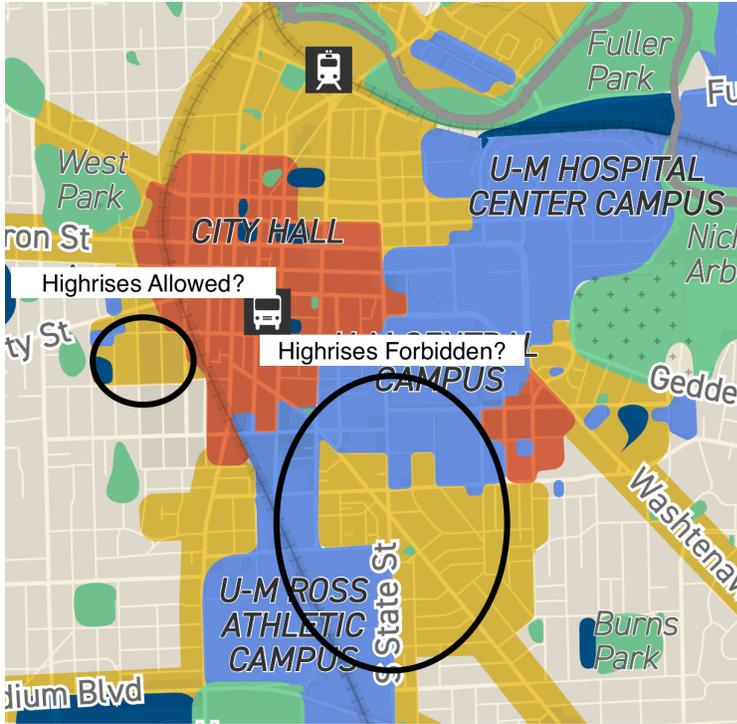
I personally favor putting all R3 and R4 in Transition, but whether or not you use that principle, please avoid creating another land use category. A simple plan will be easier to implement, more equitable, and less vulnerable to misinformation.

Make it clear that highrises in Transition will be allowed “far from Residential” rather than only “near Hub,” so that highrises are not forbidden near Central Campus.

On [page 115](#), The transition height rules suggest that high-rises will only be allowed near Hub districts.

- ▶ *Low- to high-rise buildings
(high-rise if adjacent to Hub)*
- ▶ *Context-sensitive height (lower/smaller adjacent to Residential and taller more intense near Hubs)*

This principle would limit high-rises next to Central Campus where they are most needed. It would also create the unintended outcome of allowing highrises in transition areas that are close to Hub but also immediately next to Residential areas.



To avoid this unintended outcome, the bullets above can be rewritten to say:

1. “Low- to high-rise buildings (high-rise when far from Residential districts)”
2. “Context-sensitive height (lower/smaller adjacent to Residential)”

You could also just delete bullet point 1, since it is redundant with point 2.

Make it clear that noxious heavy industrial uses will not be allowed in Transition

On [page 114](#), The Hub category permits “light industrial” uses, while Transition permits “Industrial” uses without qualifiers. The most straightforward interpretation of this difference is that the Transition district will allow both light and heavy industrial uses.

- ▶ Residential
- ▶ Commercial
- ▶ Office
- ▶ Industrial
- ▶ Prefer active first floor on arterials

Transition

- ▶ Residential
- ▶ Commercial
- ▶ Light Industrial
- ▶ Office
- ▶ Prefer active first floor commercial, particularly at nodes

Hub

This change is surprising, because in the first draft of the comprehensive plan, the Flex district did not allow heavy industrial uses. [Page 102](#) of the first draft lists the following permitted uses under Flex:

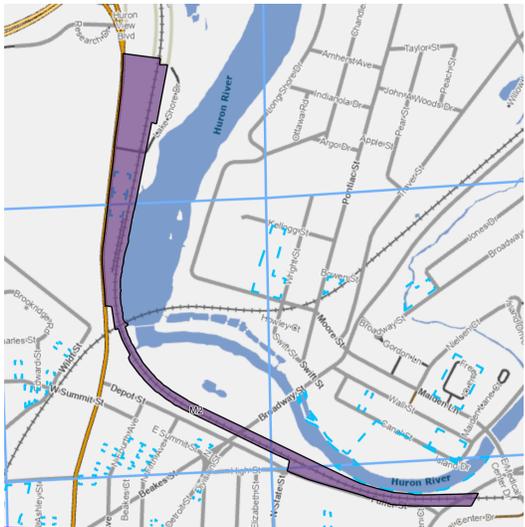
- ▶ Office, Commercial, R&D, light industrial
- ▶ Residential when infrastructure allows

It would not be wise to allow heavy industrial uses in Transition areas. There are currently only two heavy industrial districts in Ann Arbor:

1. A tiny patch at Hoover and Greene that is owned by U of M and DTE.
2. Part of the North Main corridor.



Hoover and Greene



North Main

There does not seem to be a universally accepted distinction between “heavy” and “light” industrial uses, but a key difference is that “heavy” industrial uses have more intense emissions and impacts on the land uses around them. The North Main heavy industrial district immediately abuts houses, Argo Docks, and [other sensitive land uses](#), so the city should not plan to allow new heavy industrial uses in this area. To my knowledge, there are no noxious industries on North Main currently, so prohibiting new heavy industrial uses there would not be a big change. The Gypsum Supply company on North Main is already in a light industrial district.

Instead, the city should rezone North Main to allow light industrial, residential, and commercial uses. [Many cities](#) have mixed-use light industrial districts.

Of course, the Transition districts covers far more areas than just North Main. It would be unwise to plan to allow heavy-industrial uses in all these other areas, because heavy industrial uses would, by definition, have heavy impacts on neighboring land uses.

I agree with commissioner Norton about removing the line on page 79 that says, “nuisance regulations should be reviewed to minimize complaints while prioritizing flexibility.” The plan should prioritize the health and safety of Ann Arbor residents, not minimizing complaints.

Summary

The current draft of the comprehensive plan classifies some R1 parcels as Transition. These parcels fit into three main categories:

1. Isolated parcels surrounded by other zones.

It's important to keep these parcels in Transition, so that nearby height limits are not restricted by isolated residential parcels that are not currently separated from other land uses.

2. Parcels along arterial roads.

I favor keeping these parcels in Transition, but I don't think doing so is very important. If you find that these parcels are jeopardizing the plan politically, I suggest removing them.

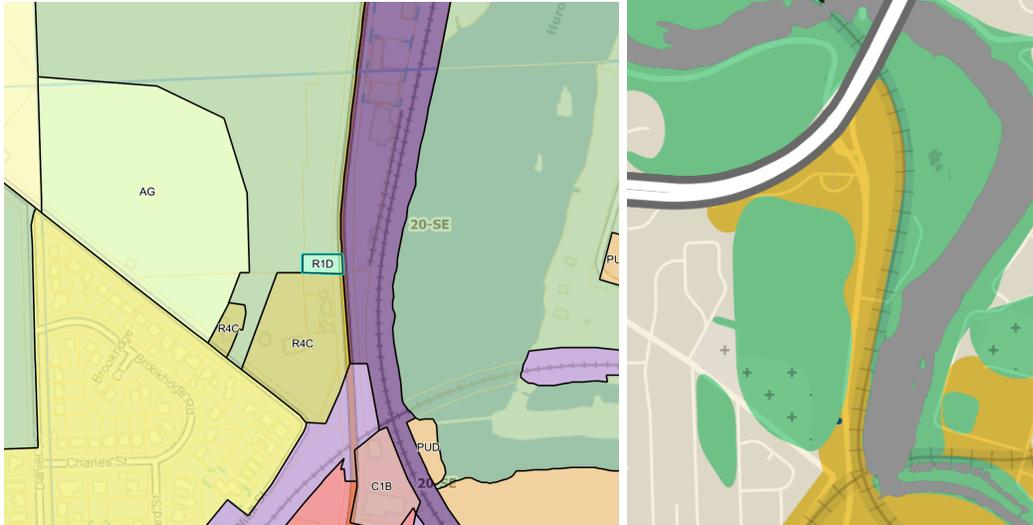
3. The Upland Drive neighborhood

I think it is probably unwise to put the Upland Drive neighborhood in Transition, as doing so would allow highrises in a currently single-family neighborhood. This allowance would be inconsistent with the rest of the plan and could fuel the backlash against it.

Details

Isolated parcels surrounded by other zones.

Transition contains a few one-off parcels of R1. It is important to keep these parcels in Transition, so that the context-based height limits in Transition and Hub are not limited by single parcels that have never been separated from other land uses anyway.



An isolated R1 parcel on North Main

For example, I don't think it would be reasonable to limit building height limits on all of North Main so that the single R1 parcel above is protected from tall buildings hundreds of feet away.

Parcels along Arterial roads.



R1 on W. Stadium



R1 on Washtenaw

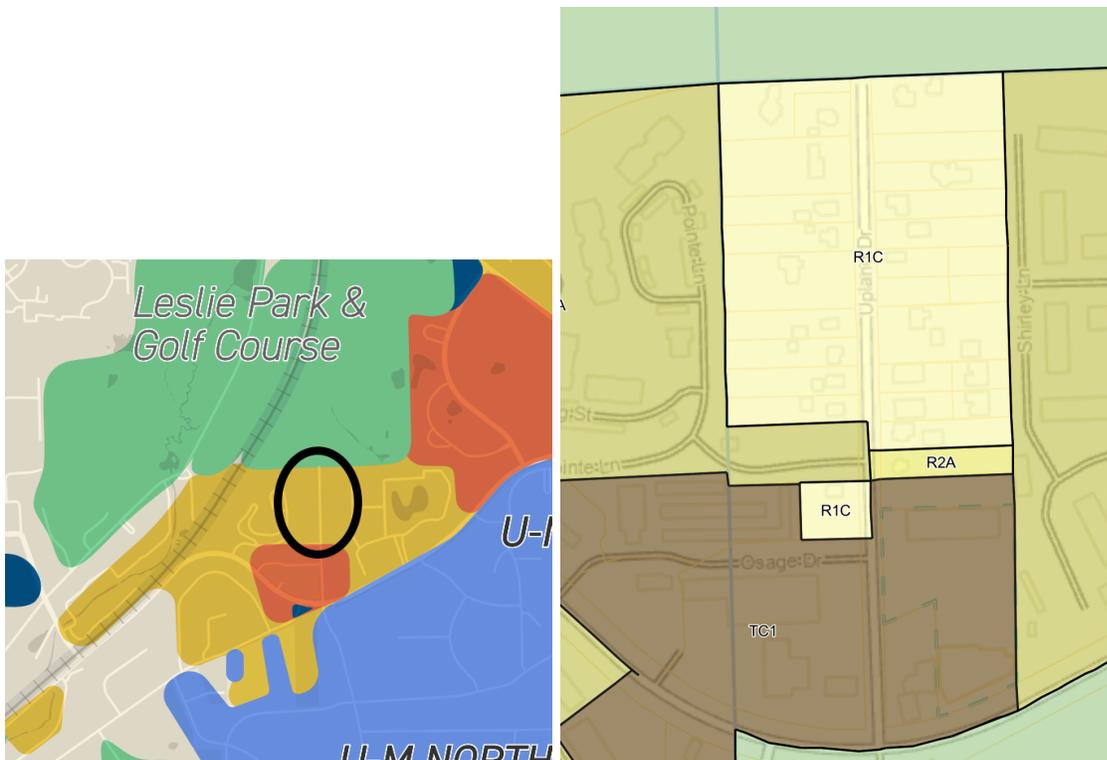


I don't think these inclusions will end up being very important, because the buffering rules for Transition will limit the heights in these areas to a level similar to the immediately adjacent residential districts.

The main effect of marking these areas Transition would be to allow a wider variety of businesses than those allowed in the Residential category. I see this flexibility as a good thing, but I don't expect many developers will be eager to buy expensive single-family houses and tear them down to build light-industrial facilities. I think the end result will be similar if the city marks these R1 parcels as Residential.

However, these inclusions are going to be very controversial, and I expect many homeowners who see their home in a Transition district will feel singled out and angry. If you find that putting these parcels in Transition is jeopardizing the plan politically, I don't think you should insist on keeping them in Transition.

The Upland Drive neighborhood





Upland Drive, included in the Transition District

As far as I can tell, Upland Drive is the only place where an entire R1 neighborhood has been placed in the Transition category. There are no Residential parcels nearby, so a Transition district would allow either highrise or midrise apartment buildings depending on how it is implemented.

I would guess staff or the consultants marked this area as Transition because most of the land around it is multi-family residential. Marking this area as Residential would limit building heights near North Campus where housing is badly needed.

On the other hand, allowing high-rises in a currently single-family neighborhood could be extremely controversial. I can imagine an Mlive article with photos of the neighborhood titled something like "Highrises Here?" I also think its inclusion in Transition could pressure City Council to limit building heights in Transition, which could greatly reduce the supply of housing city-wide.

A compromise option could be to mark Upland Drive as Residential, but recategorize the surrounding areas as Hub to allow mid-rise buildings immediately adjacent to Upland Drive.

Summary

To implement City Council's [July resolution](#), I suggest you go through each one of the resolved clauses and make an edit for each point rather than fully delegate to the consultants, so that you are sure to get the result you want.

I recommend incorporating council's instructions with the same broad language they used in the resolution rather than spend multiple meetings debating specific rules about short-term rentals or the meaning of "neighborhood context." Discussion of specifics can happen at the time of zoning, when you and the public will have more time to consider details.

Below are suggestions for how to implement some of the resolved clauses without getting bogged down in premature debates.

Resolved Clauses

Clarify categories vs districts

I suggest replacing the word "district" with "category" throughout the plan, except when specifically referencing zoning districts.

You could replace the "Zoning" column on [page 115](#) with a paragraph explaining the difference between categories and districts. In doing so, you would remove the bullet in the Hub row that says "amend D-1, D-2, and TC-1". I think this removal would be good, since it would encourage the commission to consider Hub zoning from a clean slate rather than assume that D1/D2 and TC1 should be preserved. You could still reuse these existing districts later if you want to.

It is important to avoid specifying a minimum number of zoning districts in each category. Specifying a minimum before establishing how these districts will differ from each other, or where they will be applied, in a plan that is supposed to [create fewer zoning districts](#), would be counterproductive.

Widely allow Duplexes and Triplexes and selectively allow larger typologies

I recommend simply amending the Residential's category's "intent" section on [page 118](#) to include the text from the resolution. You could add:

"Duplexes and triplexes will receive widespread opportunity and ease of development, whereas larger building typologies will be authorized only where they fit into the existing neighborhood context, meaning:

1. The built form of a neighborhood, including building features such as height, mass and scale, setbacks, lot coverage, roof styles, and porches, stoops and entries that face the street;
2. Streetscape and visual rhythm, which involves street trees, sidewalks, building spacing;
3. Neighborhood walkability, mix of unit types, and features that allow a wide range of people - young adults, seniors, families, individual adults - to live nearby and enhance social and cultural life."

I think this language supports allowing small apartment buildings throughout the city, but that issue can be debated at the time of zoning. For now it would be best to say exactly what council said, so that they have no grounds to reject the comprehensive plan on this issue.

You could also modify "Primary/Uses Buildings" on page 118 to say:

"Small apartments that fit into existing neighborhood contexts."

Recommend form-based density restrictions

Most of the suggested tools are in the plan already, but you could add the new form-based ones to the list under "Form and Site Considerations" on [page 118](#).

The suggestion to consider a limit on the number of units is already accomplished by the Duplex and Triplex language above, so I don't think you need to add an extra line talking about unit caps or bedrooms.

Regulating "beds" is really a euphemism for regulating unrelated people per dwelling, since there is no effective way to use zoning rules to limit the number of beds in a home. The city sometimes uses bedroom caps when requesting proposals for publicly supported projects, but

in these cases the city has discretion about which project to pick, so developers have an incentive to obey the spirit of the bedroom limit. Developers who only need to only meet the technical requirements of the zoning code would have no such incentive, and they could call their bedrooms home offices or whatever other term.

A bedroom limit in the plan would just be an invitation to create a distasteful “unrelated persons” rule at the time of zoning.

Allow More U of M housing in Hub and Transition Neighborhoods

To implement this suggestion, I suggest:

1. Uncapping Transition heights when far from Residential, not just “Near Hub,” so that highrises are allowed near Central Campus.
2. Removing the “prefer active first floor uses” bullets. Active use requirements would greatly limit housing construction and important non-retail uses. To include these bullets as non-binding “preferences” would be useless and risky. At the time of zoning, a consultant might add active use requirements to implement these bullets unless they are removed.

I discuss these issues in my [Final Tweaks Memo](#).

Short Term Rentals

The resolution suggests that the plan “provide material limitations on short term rental uses in the Transition category.”

I recommend not starting a lengthy debate about short-term rentals. That debate can be had in the years to come. Instead just insert council’s language calling for material limitations on short term rentals into the Transition district description on Page 118.

Light Industrial Uses

Council requested “An identification of existing laws, rules, and regulations that will prevent Transition category light industrial uses from constituting a nuisance with respect to adjacent housing.”

To implement this request, it is first necessary to establish that heavy industrial uses will [not be allowed in Transition](#). Then you could instruct the consultants to identify the regulations that prevent light industrial uses from constituting a nuisance.

The UDC currently defines heavy manufacturing as manufacturing that doesn't meet the definition of light manufacturing, which is in turn defined as manufacturing contained inside a building that doesn't create nuisances or hazards ([page 265-267](#)). By these definitions, heavy manufacturing is very likely to create nuisances, so it is important to not allow heavy industrial uses in Transition.