

Subject: Chapter 4 suggested changes
Attachments: Comp Plan edits - Chapter 4.pdf

From: Kirk Westphal **Sent:** Sunday, April 20, 2025 9:00 PM
To: Planning <Planning@a2gov.org>
Subject: Chapter 4 suggested changes

Dear Commission,

Thank you for your thorough deliberations. Please find attached my suggestions for Chapter 4.

I am disappointed to see the extent to which the CPC's directives have not been reflected in the current draft. It's as though it were written several months ago.

Given the plan's length and the limited time you have to dedicate to each section, **I hope you will entertain large-scale deletions as a body — such as the entirety of pages 64-71** — before embarking on page-by-page edits.

Best wishes,
Kirk Westphal
Ward 2

Chapter	Page	Original		Type of change			Reason
		Text	Graphic	Replace With	Omit	Add	
4	46	"Increase housing (1,200-1,800 homes per year for 25 years) to maintain..."	Housing unit ranges graph	A more useful metric, perhaps residential vacancy rate or rent burden statistics?			Unit construction depends on many factors out of the city's control and fluctuates widely. The top end of the range is insufficient if demand increases; the bottom will be unrealistic if interest rates or materials costs spike. Do not use unit counts as a metric.
4	47	"How have other communities added housing to single family neighborhoods?"		How have other communities attempted to add housing to single family neighborhoods?		"It should be noted that these reforms have not succeeded in significantly expanding housing options in the short term. To meet City Council's directive to add housing across all neighborhoods, more flexibility in housing types and parcel sizes will be necessary."	These examples are useful examples of why these reforms are <u>inadequate</u> to meet council's directive.
4	48	"The current housing pipeline is 750 units per year on average. There are 5,300 units in the pipeline (meaning they have site plan approval between 2018-2024). This puts Ann Arbor ahead of the 2022 Michigan Housing Plan for multifamily targets for 2030 but behind for single-family targets."			X		1) Again, numerical housing targets are not helpful, 2) averaging targets across high- and low-demand areas is problematic and ignores existing supply shortages, 3) is "more single-family construction" the correct take-away here?
4	54	"Existing affordable housing units are an important resource that must be safeguarded to maintain affordability for residents and also support sustainability by saving embodied carbon."			X		Assuming this is talking about market-rate affordable housing, these are questionable assertions. 1) There is value in attempting to prevent the disruption of higher-density, naturally-occurring affordable housing communities (eg through Housing Commission acquisition), but stopping the redevelopment of lower-density housing into higher-density housing will add rent pressure to all other existing units — and there's nothing to stop eventual rent increases in the affordable units. 2) The "embodied carbon" argument should be removed because preserving low-density housing types in high-demand areas results in high-carbon sprawl. It fuels the misleading trope of, "The greenest building is the one that's already there."
4	54	"Additional actions the city can consider to increase affordable housing development include leveraging publicly-owned land, preserving naturally occurring affordable housing (NOAH), and offsetting city sustainability requirements."		Remove the "preserving NOAH" part; explain or remove "offsetting city sustainability requirements."			Unless the Housing Commission wishes to preserve NOAH by acquiring it, it's not advisable to leave this idea undefined.
4	57	"Preservation to maintain current subsidized and unsubsidized affordable housing."			X		1) Does it need to be stated that we should preserve current subsidized units? 2) The best way to preserve market-rate affordable housing is to allow abundant market-rate construction, not trying to freeze older structures. For every 100 market-rate units that are built, 70 units open up in neighborhoods earning below the median income. Perhaps the plan should recommend consideration of a "replacement density requirement" (on top of an overall minimum density requirement) so that any residential displacement that occurs should provide significantly more units (eg, at least 30%).

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4	60	"Certain areas of the city are best suited for medium and high density mixed-use development due to existing and planned investment and infrastructure. The city should focus medium and high density mixed-use development along transit corridors and hubs, and in proximity to community amenities and assets, such as regional parks that have the capacity to serve additional residents and support walkable neighborhoods with reduced car travel."			X		We are in a housing crisis, and we shouldn't be 1) arguing for prohibiting high density housing anywhere except in and immediately adjacent to areas where CPC has decided it is politically incompatible or 2) setting up justification for multiple zoning districts depending on proximity to "community amenities." This will significantly prolong rezoning. Developers are required to satisfy infrastructure constraints for each project. The caution about "infrastructure constraints" again appears to be setting up justification for "Flex" and for establishing multiple zoning districts within the current land use categories. On the whole, water and sewer use are significantly down from their peak. We have invested heavily in excellent transit throughout the city.
4	61	"This will entail allowing for limited small-scale commercial space in residential districts, by focusing local commercial uses in neighborhoods along collector streets or on corners and aligning use restrictions with community desires and needs."		Omit "along collector streets or on corners"			Many of our best-loved small scale retailers (eg Jefferson Market, pictured in the plan) are not on corners. Why restrict mid-block? Plus, this will again mandate complexity block by block and preference wealthier residents.
4	63	Goal 5 and Goal 7			X		These exist as rationale for the theories about "diversifying the economy" and the promotion of the Flex and Innovation districts that you've already advised against.
4	64-71				X		This appears to be a precursor of justifying the Flex and Innovation districts.
4	72	Omit entirety of 6.2: "Promote additional downtown-like development by retrofitting car-oriented shopping centers to increase their mix of uses and walkability over time"			X		Contradicts your directive to require redevelopment, not "encourage retrofits," which enables new multi-decade leases, of shopping centers
4	73	Omit entirety of 6.3: "Encourage the development of a mixed-use, employment-centric district along Plymouth Road that complements the U-M Innovation District on North Campus"			X		Contradicts your directive to eliminate the Innovation district.
4	74	"The city should work with its partners to identify and target spaces in downtown and neighborhood commercial districts, in publicly owned assets and in industrial spaces for preservation and to create "growth space" to keep businesses in Ann Arbor"			X		This has not been a priority for CPC, and if CPC, council, DDA or the new economic development staff want to pursue this strategy, it should be pursued separately from inclusion in this Plan. Also, subsidizing low-tax base space is not an advisable strategy, particularly not before attempting to retrofit space like the ground floor of 4th and William.
4	78	"Reduce construction waste"			X		If you do not intend to create rules that punish projects that do not reduce construction waste, please omit.
4	78	"aligning development with transportation infrastructure"			X		Again, this seems to be a precursor to discouraging residential development in certain areas of the city (eg. southeast area).
4	79	"Intentionally linking land use changes to transportation investments is preferred to take advantage of existing investment rather than increasing spending and taxes for areas of the city with little existing infrastructure and fewer drivers for growth."			X		Omit (same reason as above)
4	79	"Better public transit should be a priority and growth should be aligned with expanding transit."			X		Omit (same reason as above)

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4	79					"Priority should be given for funding highly-leveraged infrastructure investments such as narrowing multilane roads; acquiring alleys/rights-of-way in (and across) large private parcels to avoid unnecessary curb cuts; acquiring new easements for pedestrian and bicycle connections between neighborhoods (eg. the Oakbrook extension); and evaluating the construction of consolidated district parking structures that may be convertible to other uses."	This seems like an appropriate place for infrastructure wish-list items that exist in other plans and on the CPC work plan.
4	80	"Implementing the SEU will require land in the city for large-scale solar power."					Is this true or advisable?
4	80	"A future land use scenario that adds thousands of residents in certain areas of the city will require rethinking distribution of transportation infrastructure to make the city less car dependent."			X		Again, we have a housing crisis and an excellent transit system. We should not be prohibiting housing anywhere.
4	86	"supporting high-density development around planned transit hubs and high-frequency lines."			X		We have bus transit, and the "hub" philosophy is not appropriate. For example, TC1 was applied too sparingly (eg omitted Lowertown, the Produce Station area, etc.). We have an excellent transit system. High-density housing should be allowed unless there is a compelling reason not to.
4	87					specify "parking maximums," "parking unbundling and cash-out," and "residential permit parking reform" as TDM strategies.	I believe these are on the CPC work plan. I'd argue that the evaluating the high annual residential permit subsidy by the city fits under TDM as well.