

From: Jim Lewis
To: City Council; Planning; Brett Lenart; Lisa Disch
Subject: Practical Zoning Framework Proposal For Consideration - CLUP
Date: Thursday, October 23, 2025 8:01:20 AM

Dear Ann Arbor Planning and Zoning Team,

I want to share a perspective on short-term rentals and accessory dwelling units (ADUs) as the Comprehensive Plan and future zoning map move toward adoption.

Today, enforcement of the STR ordinance is reactive and inconsistent, especially in older, denser neighborhoods near downtown. Areas like the Old Fourth Ward and Kerrytown include many unlicensed Airbnbs because their current R4C or mixed zoning already blends commercial and residential uses. These properties operate much like small-scale lodging within walkable, mixed-use corridors. Meanwhile, in true residential neighborhoods—Old West Side, Water Hill, Burns Park—the ordinance has been more effective, and the impact of transient use would be far more disruptive.

The proposed *Transition* and *Hub* designations offer a chance to codify what's already happening and provide clarity for both property owners and enforcement. My position is straightforward:

- **Allow and regulate** STRs in prominent, denser locations—essentially the *Hub* and *Transition* areas where land use and infrastructure support mixed or transient occupancy.
- **Prohibit non-owner-occupied STRs** in all *Residential* zones to protect long-term housing stock and neighborhood stability.
- **Encourage and broadly permit ADUs**, particularly in *Transition* and *Hub* zones, and extend eligibility to multi-unit properties where feasible. ADUs are one of the most effective ways to add gentle density, provide attainable housing, and create incremental infill without altering neighborhood form. They work especially well in areas already served by transit, utilities, and walkable infrastructure.

This approach aligns policy with on-the-ground reality. It directs STR activity to places designed for higher intensity and mixed use, while expanding year-round housing opportunities through ADUs in the very areas best equipped to support them.

This structure maintains neighborhood integrity while capturing the economic and sustainability benefits of a controlled STR program.

Thank you for considering this proposal.

Jim Lewis