

Subject: [Comprehensive Plan Feedback] Don't downzone multifamily land-uses in Transition Districts

From: Donal Couch

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To: Planning <Planning@a2gov.org>

Subject: [Comprehensive Plan Feedback] Don't downzone multifamily land-uses in Transition Districts

Hello City Planning Commission,

I appreciate your continued effort on the draft Comprehensive Plan and have some feedback from my personal experiences with housing in Ann Arbor.

As a synopsis of my thoughts: We are actively in the middle of an acute housing crisis, largely due to inaction over previous decades both by the city in restricting the types and places where larger developments were possible and the University for not building and supplying housing to its growing student population. Generally, the use of hub and transition districts should greatly expand. Many more areas (Washtenaw between the intersection with E Stadium until Arborland; Plymouth between Murfin and at least Huron Parkway; Broadway to Wall St north of the river; etc.) should be listed as hub districts and transition districts should be allowed in almost all R1/2 areas. At a minimum, high access to rapid transit corridors should be zoned as hub districts with transition districts allowing for low to high-rise development (including apartments by default in comprehensive plan language) feathering out density towards residential areas.

I'm currently a Ph.D. student at the University of Michigan and while there is something to be said for not having as much "skin in the game" as those who are long-term residents of the city (and thus my opinion is less influential), I think the fundamental relationship between the University (and it's students and employees) and the city is important with respect to the Comprehensive Plan. Ann Arbor is directly hurting from an acute housing crisis (as well as broader economic headwinds nationally towards housing). While this is anecdotal, the majority of my colleagues have been priced out of living within Ann Arbor or have struggled to find housing on our meager stipend, in large part due to the development of housing not keeping up with demand as the university has expanded in recent decades. While this is not the city's "fault", it is still something they can directly impact through levers that affect development (such as the UDC, Comprehensive Plan, and other ordinances/policies).

In particular, I believe both the hub district and transition districts should be further expanded. The transition districts have the most potential for attacking the housing shortage in the city, and policy implementation should be aggressive in tackling this (ideally, by listing all areas not zoned RC1/2 as transition districts/denser land uses). While I understand the intention in having this type be characterized by low to mid-rise buildings, I feel this is short sighted given the current conditions. Even in what is outlined as hub districts in the Draft Comprehensive Plan, so many times over the past few years has there been considerable pushback on any development of mixed-use towers, despite the strong need for more housing. In many of these cases, developers had to seek additional permits for non-

conformity, slowing down and increasing costs for building more housing. Simply put, we do not have the time to continue with incremental development, we need to reduce barriers, and the implementation of transition districts should be one of these. The building form section should be changed to allow high rise construction and transition districts should have apartments as a primary use (page 111). Additionally, the requirement for active first floor commercial use should be changed to a suggestion. In many cases, these first-floor commercial spaces remain vacant for long stretches for a variety of reasons (large floor plans that aren't sized to be feasible for small business owners, high rents due to the exorbitant cost of construction, etc.). To me, it seems requiring these both reduces the gross number of housing units constructed and leads to a less vibrant street scape if these commercial units are not filled.

The area that is listed as hub or transition district should also expand to cover more of the city. Having transition districts only on parcels abutting arterial streets (and a few other areas) is missing the point. On high traffic transit-rich corridors (as many of the listed transition district areas are) we should be allowing high rise construction with transition districts blending the density towards lower height uses over a 2-3 block wide radius on these streets. Furthermore, particularly around downtown and the Plymouth/UM innovation district area, more regions should be listed as hub districts. As someone who works in the NCRC, none of my colleagues are able to live within a 15 minute walk of it (except within University owned housing). This directly leads to increased car usage, working actively against the city's climate and Vision Zero goals. The commercial region centered on Plymouth and Nixon/Huron Parkway should be listed as a hub area to allow for significantly higher densities - both for undergraduate students who primarily take classes on North Campus, and grad students/post-docs/research techs (and others) who work in the vicinity. As the University directs further investment towards start-ups and other research-related enterprises in this area with the development of the Innovation District, this need will only become stronger over time, and now is the prime opportunity to take action. As well, the Washtenaw Ave corridor seems a perfect example of a street that should be a Hub District (particularly between the Trader Joe's in Lamp Post Plaza and the Whole Foods/Barnes & Noble development and beyond).

Within residential districts, "small-scale neighborhood-serving services" should be allowed by right on any parcel, not just corners, minor arterials, and collector streets. Many important retail locations in Ann Arbor don't fit this definition, and it feels needlessly arbitrary to restrict where a café, small hair-salon, antique shop or similarly unobtrusive land use can be located. In general, calls for maintaining neighborhood character read as extremely naïve. The city is not a fossilized entity frozen in amber and we should not treat it as such. Language such as this is most frequently used as pushback on any new development – once again, we are in a housing crisis and do not have the ability to allow such inaction to proliferate. In general, townhouses, stacked flats, etc. should be allowed by right anywhere in residential districts. Speaking anecdotally, many younger people my age would love to live in a townhouse (either renting or owning), but the ones that are present in Ann Arbor are so expensive or prohibitively competitive that this is a foregone conclusion. Young people who will be the future of this city strongly desire this type of land use and restricting it or other similar types of housing to specific areas in the residential districts when they make up such a larger area of the Draft Comprehensive Plan is overly restrictive. The line on page 110 about noise, overcrowding, and traffic is exceedingly short-sighted. We live in a city and people should know what that comes with. Ann Arbor is physically constrained in land area and is a particularly desirable place to live. That means definitionally that there will be noise and traffic. Overcrowding and traffic in particular is only relevant if one assumes we should be providing ample 200 square foot area storage receptacles for cars – they are what would lead to overcrowding, not housing itself. Especially in light of the Ride 2045 plan this feels not sufficiently considered. As someone who used to live downtown and now lives in a more residential area of the city, my current location is

noticeably louder at night than when I lived downtown. My anecdotal experience is no more accurate than the assertion of residents, and as such this language shouldn't be used.

Thank you for your time and consideration,
Donal Couch
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