

From: [Kirk Westphal](#)
To: [Planning](#)
Subject: Land Use plan feedback: more housing, less guessing
Date: Tuesday, November 26, 2024 12:09:18 PM

Dear CPC Comp Plan Committee,

Thank you for your work on the plan. I appreciate that you are centering city council's directives to prioritize simplicity, flexibility, density, emissions reduction, and social justice. I think this could be an inspiring, nation-leading plan if we don't unnecessarily complicate it.

Please consider the following **changes** to the latest Land Use map and proposed associated rules:

1. **Expand the downtown well beyond its obsolete boundaries**
2. **Eliminate the “employment,” “innovation,” “retail,” and “transition” zones**
3. **Reduce the map to two self-adjusting building zones:**
 1. an unlimited-height district like TC1 for *all* commercially-zoned parcels and *most* R4C parcels (the height of which is inherently limited by — and tapers down to — the low-rise district)
 2. a low-rise district regulated by form that allows more height than today and tapers down to neighboring *parcels*

Please consider **adding** the following concepts to the plan:

- **Limit off-street parking** ratios, overall area, and placement
- **Eliminate all lot size, open space, and density/unit restrictions**
- **Allow stand-alone commercial in all zones** (with strict off-street parking limits)

Motivations for the above:

Housing inclusion

Prohibiting housing from any district, either directly through the "employment" district, or indirectly through "innovation" and "retail" districts, would be a mistake and hamper our efforts to tackle the housing crisis. This is basically inclusionary zoning for office and retail. If the city really wants this, we should subsidize it, not harm people looking for a place to live. Granted, I still think that TC1 should mandate very small amounts of retail on major corners (instead of just prohibiting dwellings as it does currently), but precluding the possibility for all-residential dwellings in massive areas along transit corridors would be a mistake.

Self-adjusting districts and parcels instead of more districts

TC1 is already an excellent zone that capably tackles the problem of too much height next to lower-scale neighborhoods. Why do we need a new mid-rise zone that does the same thing,

except smears it over several blocks? Plus, the prospect of introducing a transition zone that picks winners and losers from *within existing RI* sounds like a nightmare. We can get useful missing middle heights in current detached neighborhoods by adding some height flexibility (say 35-48') depending on the distance to neighboring property lines. This would automagically allow more stories next to wider roads because the neighboring property lines are across the street.

Downtown has the highest housing need

Instead of asking where is appropriate to arbitrarily draw the new downtown line, I question where it is ethical to prevent the highest-density buildings near UM campuses, Michigan Medicine, the river, Amtrak, frequent transit, etc. Is there any reason not to allow the most dense zone to cover most or all of the current rental housing stock? Why not North Main, the non-historic-district area between Division and Michigan Medicine (Depot/Fuller), east of central campus (e.g., between North U/Geddes and South U) and south of central campus (e.g., down to Oakland, Arch, Hoover)?

Self-buffered areas should be high density

Ann Arbor Golf and Outing is mislabeled as "public." This parcel and Concordia should be upzoned to the highest density. Doing so would also decrease the probability of UM purchasing this land.

Regards,
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Ward 2