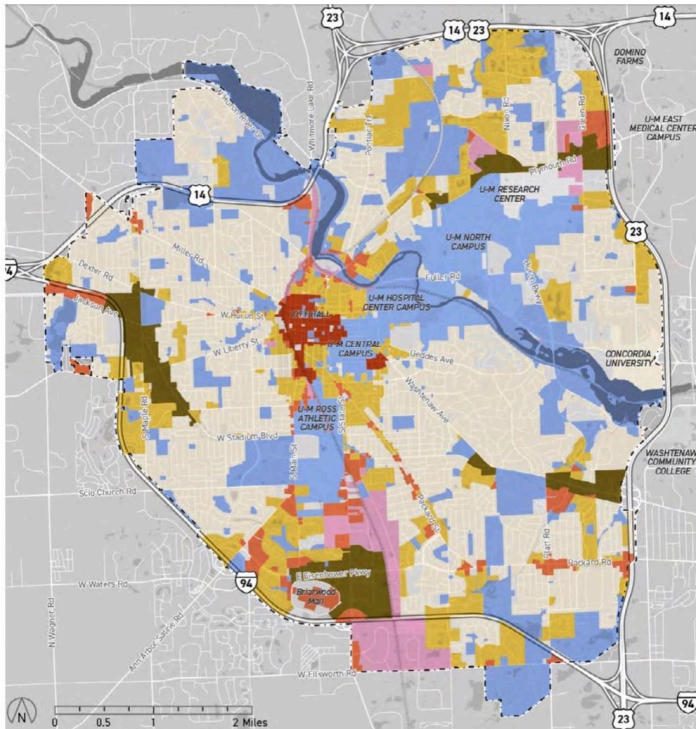
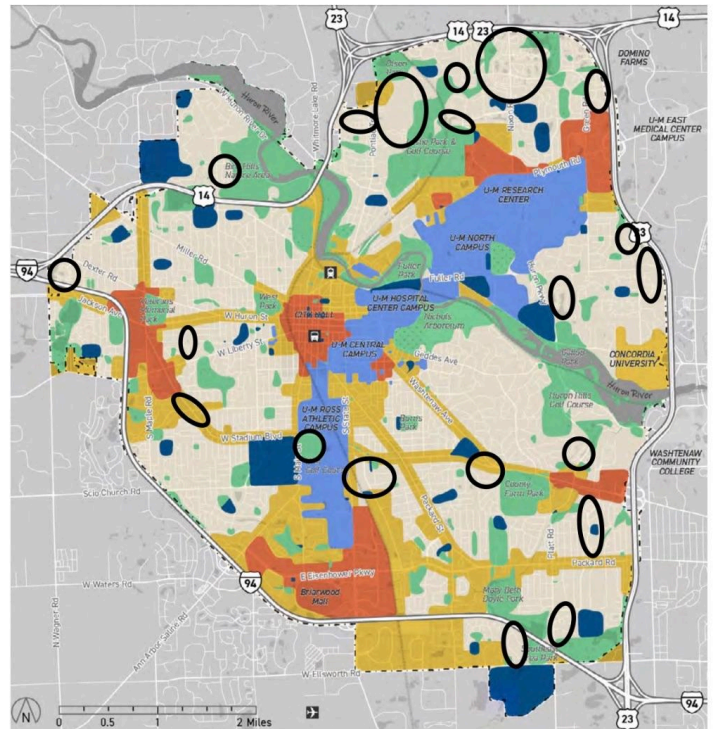


Thank you for continuing to incorporate feedback on the draft plan. I think it has improved a lot, with the map being the biggest exception.

1. Change all R3/R4 and C parcels to "Transition." Hundreds of acres of multifamily- and commercial-zoned parcels (map on left, current zoning) are proposed to be "Residential" and limited to 3 stories by right (map on right, proposed land use). This includes the S Industrial area (Woodbury Gardens, Venue, Salvation Army, Revel and Roll) as well as large apartment/condo/coop complexes on the north and east side (Geddes Lake, Villas at North Star/Windemere Park Apts, Arrowwood, Chapel Hill, etc.). I have highlighted some of these areas in black circles. There is excellent transit and water/sewer infrastructure in many of these areas, and they present opportunities to bring the rooftops needed to support neighborhood-serving retail. The rationale for making these exceptions seems to be that they are "far from Hub." Why does this matter? Why make these owners apply for rezonings (like Woodbury Gardens) if they wish to redevelop parts of their properties to above 3 stories?



Current zoning



Draft land use map, some differences highlighted

2. Change the Trader Joe's and Baskin Robbins areas to "Hub." They are currently TC1, but unlike all other TC1 areas, they are now designated as "Transition." (These are also highlighted.)

3. Change Ann Arbor Golf and Outing to "Transition." It is a privately-owned parcel, not a "Park."

4. Strike section: 6.3 "Promote additional downtown- like development by retrofitting car-oriented shopping centers to increase their mix of uses and walkability over time." (p 81) This contradicts your directive to stop reinvestment in shopping centers like Arborland and Westgate. Allowing incremental development in these centers means leases will be renewed and new ones will be started, ensuring they will remain car-oriented for generations.

5. Strike reference to unit count, as this is not the direction that the commission wishes to communicate (p 51): “There is support for increasing housing options in all residential areas, with the majority of participants expressing comfort with allowing up to 4 units in their neighborhood.”

6. Strike: “may provide a variety of character areas to emphasize or limit distinct land uses” (in Transition). (p 115). The Transition district should be a singular flexible district.

7. Strike references to “public infrastructure” and “growth should be directed” in the following (p 60):

Allow for more density with building form controls in all residential districts and encourage denser multi-family housing in places with public infrastructure. Growth should be directed into places where it can benefit from other public investments, particularly in transit and other multimodal facilities, sewer and water capacity, and park space.

The commission has highlighted on multiple occasions that infrastructure will follow growth, and the city is not in danger of approving projects that cannot be serviced. The repeated theme of “directing growth into certain areas” and inferring that some areas are not appropriate for development due to lack of public infrastructure or transit is unnecessary.

8. Strike: “Historic district boundaries will be maintained.” (p 60) It is not the role of the Comprehensive Plan or the Planning Commission to enforce these boundaries.

9. Revise definitions of “displacement” and “gentrification” (p vii-viii). They fail to mention the primary driver: lack of supply. The incorrect message they are communicating together is: “Displacement is caused by gentrification which is caused by new investment and new units” when these are downstream effects.

Displacement

Displacement is often the result of gentrification (see definition below) when many existing residents are priced out of their own neighborhood due to the high cost of living caused by new investment in the area. It is a destabilizing change that often starts with a loss of income-eligible or naturally occurring affordable housing, and forces lower-income and minority residents to move out of an established neighborhood.

Gentrification

A combination of rising home values and rents, rising income levels, and rising educational attainment levels, usually in longtime urban neighborhoods that historically had low levels in each of these areas. The results in the neighborhood come from an influx of new, often upscale, housing development; new commercial development that caters to an emerging clientele; and the change — or outright loss — of community identity.

Also I don’t believe the chosen definition of “form based code” reflects how CPC would wish to employ it:

Form-based code

Zoning that aims to address the problems related to urban sprawl while preserving historic neighborhood character and charm. In this model of urban planning, development is restricted by physical form rather than by uses. For example, a single-family neighborhood may be opened to alternative residential uses, so long as those new structures fit the visual character of the neighborhood.

Suggestions for implementation matrix:

1.1

- **Strike the item calling for regulation of 4BR+ buildings.** This seems to contradict strategies to encourage co-ops and rooming houses in 1.4. Handle with form/hybrid zoning rules instead.

1.2

- Development of pre-approved plans and design requirements for infill: change from “intermediate term” to “near term.” There is a clear community concern about neighborhood infill aesthetics.

1.3

- [It’s unclear whether these apply to *subsidized* affordable housing or *market rate* affordable housing. Exercise caution for any attempts to preserve market rate affordable housing (i.e., stop it from redeveloping) or invest in sustainability goals (e.g. insulation) in market rate affordable housing as these do not ensure long-term preservation of affordability. Focus investments on subsidized housing and tenant assistance.]

1.5

- Consider specifying *residential vacancy rates* as a metric for how to evolve zoning changes and expedite city approval processes.

3.2

- Insert language about **improving access to and usability of existing parks.** Some parks are underused due to a lack of trails and entrances, despite the city owning land or easements between private parcels (eg on cul de sacs) for this purpose.
- From your Work Plan, insert language here about requiring pedestrian access between private parcels or between private parcels and parks.

5.3

- Strike italicized: “Encourage a wide-range of businesses by offering flexibility in land use and regulations *in key locations.*” This seems to imply subdividing the Transition district.
- Strike italicized: “Ensure that zoning allow businesses that maintain a variety of *automobile-based* and transit/multi- modal oriented business models in retail corridors” as **this contradicts the goals of TC1. This is a problematic repeated suggestion from the consultant.**

6.2

- Strike the italicized part of “Promote additional downtown-like development by retrofitting car-oriented shopping centers like Briarwood *to increase their mix of uses and walkability over time.*” **CPC has consistently stated that shopping centers should redevelop in total, not incrementally.** Incremental change in Arborland, Maple Village, and Westgate means the renewal of 30- or 40-year leases. (Briarwood is a lost cause because of the missed opportunity to re-plan it in total, so it could warrant a different strategy about how to manage the remainder of the parcels.) Like 5.3 above, this is a problematic repeating theme.

8.1

- “Citizen’s Academy” has changed its name to “Community Academy.”

9.3

- Change “Support a shift in transportation modes, away from vehicular use” to “Support comfortable walking and biking facilities”
- **From your Work Plan, specify “parking maximums” (and “parking unbundling and cash-out” from a former Work Plan)** within “implement new policies to better align parking supply and demand relative to costs,” and change to “near term.” Residential parking unbundling in particular could result in significant savings for renters in the near term without a lot of complexity.

10.2

- Add: "Create an inspection protocol to ensure that water retention/detention facilities are performing as expected and that required trees are in good condition."

Kirk Westphal

Ward 2