

MEMORANDUM



TO: Planning Commission

FROM: Brett Lenart, Planning Manager
Michelle Bennett, Principal Planner

DATE: November 18, 2025

SUBJECT: Planning Commissioner Comments: Third Round of Edits for the Draft Comprehensive Land Use Plan

Staff has compiled, filtered, and organized planning commissioners' third round of comments to streamline the conversation. We greatly appreciate your attention to detail and dedication to this process. Below is a summary of how the comments were organized.

Categories of Edits Received from Commissioners:

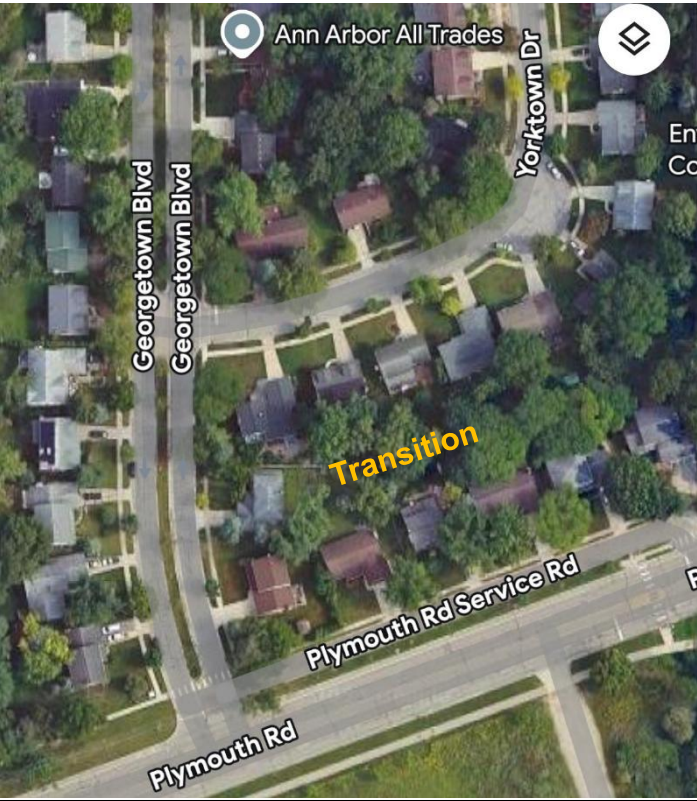
1. Discussion – These are areas that staff would benefit from discussion with the commission for additional direction, explanation, and agreement. This is the expected focus for the review.
2. Staff Supported – These are changes that staff agrees to make. They are included in a separate table for visibility to the commission. There is enough guidance that staff can make the edit, but these are more than a factual correction; please review in case you feel something here needs to be clarified or discussed.
3. Factual – These changes correct a statement factually, add a citation, or similar simple changes that will be directed to the consultant.

Discussion

Page	Edit	Rationale
58	<p>Add the following regarding historic districts:</p> <p>The city currently has 15 designated historic districts. Each district was established pursuant to Michigan Local Historic Districts Act of 1970, state law distinct from Michigan's planning and zoning enabling laws, following extensive public input and deliberation required by that act. Historic districts serve to recognize and conserve structures within distinct areas that provide significant historical meaning and heritage reflecting the city's origins and early development. Any modifications to existing districts would require following similarly extensive public input and deliberation procedures. While not part of a local zoning code, historic districts function essentially as overlay districts, where the more restrictive requirements applicable through either zoning or historic preservation control.</p> <p>The city's historic districts are all located close into downtown. They are also predominantly if not entirely zoned for uses and densities greater than single family residential development alone, and duplexes and smaller multifamily housing units can be found throughout and immediately adjacent to them. In addition, because all were built prior to the city's shift toward larger minimum lot size requirements, the historic districts are some of the most densely developed and walkable neighborhoods in the city.</p>	<p>Provide additional clarification regarding current city programs and efforts that the plan does not currently state and that I think this speak to concerns we have been hearing.</p>
60	<p>Replace paragraph with sentence starting "Historic District boundaries..." with the following:</p>	<p>Provide additional clarification regarding current city programs and efforts that the plan does not currently</p>

Page	Edit	Rationale
	<p>This plan takes no position on the potential modification of existing historic districts or the creation of new historic districts. Historic district boundaries and requirements within them will continue to follow the standards and guidelines established by the Historic District Commission (HDC). The current multi-unit residences and mixed-use developments within the existing historic districts provide evidence of their compatibility within those districts. The city should support opportunities for increased missing-middle housing density within existing historic districts when and where appropriate, consistent with the goal of increasing such density throughout the city, and consistent with HDC standards and guidelines for modifications to existing structures and the development of new structures within historic districts.</p>	<p>state and that I think this speak to concerns we have been hearing.</p>
<p>60, 113, 116*</p> <p>*Images on page 11 of this document</p>	<p>Draft 3 of the Comprehensive Plan includes language that limits by-right development of multifamily housing in Residential areas to duplexes (2 units) and triplexes (3 units). This letter and the accompanying diagrams lay out the rationale for increasing that limit to quadplexes (4 units). There are also mentions of an intent to explore expedited permitting for duplexes and triplexes on pages 62 and 136. I propose that we revise the language to include quadplexes in each of these cases for the following reasons.</p>	<p>A 4-unit development can fit into the same building volume as a duplex or triplex. In other words, raising the number of maximum allowable units by right from 3 to 4 will not result in larger buildings (by area or height).</p> <p>It often makes more sense to divide a building into two symmetrical halves – 2 units, 4 units, 6 units, and so forth. A triplex makes sense as 3 stacked units, but it's also very straightforward to design a 2-story, 4-unit building that is appropriate in scale for Residential areas.</p> <p>The primary concerns from the public about increased density that have been communicated to the Planning Commission are related to area, height, and placement rather than unit count (i.e., How much bigger will these buildings be? Will</p>

Page	Edit	Rationale
		<p>they encroach on setbacks? Will they shade existing structures or solar arrays?) The implementation of the Plan can (and should) consider these factors, but limiting to an arbitrary number of units will not effectively do so. For example, we have many 6-bedroom units in this city. A triplex of 6 BR units will result in a larger building with more occupants than a quadplex of 3BR or 4BR units.</p> <p>Building sizes in Residential areas are currently limited by area, height, and placement requirements. These are effective tools and we should continue to use them, without placing an arbitrary constraint on the number of units at three.</p>
73	Last bullet point: “will likely need to be near North Campus.” – I’d still like to hear rationale for this assumption	This feels potentially vestigial from the “innovation district” on Plymouth.
111	On the Future Land Use Map, change the small section of Transition on Plymouth, that only includes Yorktown and Georgetown and bounded by Hub (now TC1), to Residential.	<p>This portion of the street is part of the contiguous Orchard Hill Maplewood Neighborhood Association. It is only about 8 to 15 R1C parcels that are not technically on Plymouth Rd, but rather, set back from the main road and on Plymouth Service Rd. Including this bit in Residential, rather than Transition, would match the treatment of the Nixon Service drive that is only about a 15 minute walk to the west and is already in Residential.</p> <p>The area of Yorktown and Georgetown was left out of TC1 when the area was last rezoned. For these reasons, continuity with the existing neighborhood, consistency with the treatment of Nixon Service Dr, and limited increased potential even if it were included in Transition, I recommend reconsidering the</p>

Page	Edit	Rationale
		<p>area for Residential or to the "to be determined" category.</p> 
112-113	Under Transition / Preferred Building Form – Bullet 1, delete “high-rise if adjacent to Hub” and Bullet 2, delete “and taller more intense near Hubs.”	Unnecessary specificity that gives the wrong impression and can lead to misunderstanding. Not needed.
113	"Amend D-1, D-2, and TC-1."	We should not be this prescriptive on how we execute Hub. It might be amendments to these legacy districts, but it can also be new districts. That's up to Council.

Page	Edit	Rationale
115-116 (added to discussion because two different commissioners proposed comments regarding dimensional standards)	<p>Staff question – do we want to use qualifiers like approximately and maximum regarding dimensional standards?</p> <p>115: Under Residential, rephrase – “Small-scale, approximately 3 and under”</p> <p>116: In last bullet on the page, after add "maximum" before "building size"</p>	<p>The matrix on the previous spread uses the word “approximately.”</p> <p>This will make it clearer to residents what we mean here.</p>
118	Does the impact of short-term rentals need to be considered in other land use categories outside of transition?	
138	Change implementation timeline to 1-3 years and/or adding more specificity to community land trust action item	This seems like something where there is broad community support that we should look at as soon as possible.

Staff Supported Edits

Page	Edit	Rationale
Executive Summary - vi	Point people towards the research/data included in the Comp Plan (ex. “See page 14” or “See Appendix, Section 1”)	People know where to look for more in-depth data + analysis of the claims made in the “Ann Arbor Snapshot.”
Executive Summary - vi	Second to last bullet point – replace “the world is [in a climate crisis]” with “that we are [in a climate crisis]”	The crisis is here at home and not in some far off place. We are in it together. It’s a small thing, but I feel it’s important.
5	“The CLUP aligns with these plans”	Add years adopted for these 3 plans to align with the box above.
5	I still find the language in the “Past Plan” section confusing. Suggestions for edits:	We need to be 100% clear about plans that are being replaced, retained, and aligned with. These edits help clarify that and keep the language consistent. For example, on the next page the text reads, “Plans to

Page	Edit	Rationale
	<ul style="list-style-type: none"> In the green box, change “Comprehensive Plan elements to be retained” to say, “The Comprehensive Plan will incorporate three existing plans:” In the yellow box, delete “Land Use” (which is consistent with the rest of the section) so the text reads “The Comprehensive Plan aligns with these existing plans:” 	Incorporate and Align With”; therefore we should use “incorporate” on page 5 instead of “retain.”
18	Proximity to amenities: “Access to essential destinations is crucial for quality of life, but communities of color are more likely to reside in neighborhoods with limited access to groceries, parks, and schools.” – people of color instead of communities of color	<p>I still think this needs to be changed and if not I want to talk about why not</p> <p>The words “communities” and “neighborhoods” in that sentence don’t feel like they work together well</p>
36	Fourth bullet point: A little clunky – support of up to 4 units...per building? In currently zoned SF areas? Can’t possibly mean in downtown too...can this be clarified?	Still confused – in Residential zoned neighborhoods?
59	The “Major walking barriers” in the map are incorrect.	There are multiple streets highlighted that are NOT at least four lanes (as the key suggests). Examples include parts of W. Stadium Blvd, Dexter Ave, and S. Main St.
60	<p>Under Strategy 1.1, 2nd para, revise last sentence to read: “The city will need to review and rewrite the zoning code and also streamline the development review process to support affordability goals, more easily develop “missing middle” housing, whose production has declined over the past decade, and encourage alternative approaches to land use such as community land trusts.”</p> <p>Staff suggested edit: “...decade. One way to do this is to encourage alternative approached to land use such as community land trusts.”</p>	Staff rationale: Shortens the sentences and carries the same message.
63	Under 1.5 add “community before “land trusts” in second to last sentence.	CLT’s are a particular kind of land trust that’s focused on keeping housing affordable – and is

Page	Edit	Rationale
		distinct from conservation land trusts or title-holding trusts. CLT's are more in the spirit of the Plan and this section, than an overall idea about land trusts.
64	Under Strategy 2.1, add a 3rd paragraph that offers CLT's as an approach to income-eligible affordable housing and homeownership that preserves affordability.	Staff question: Does the Planning Commission want non-profit developers to be included in 1.1, 1.5, and 2.1?
86	The city has robust programs in place to conserve natural features during development and to increase overall tree canopy throughout the city. Under those programs, in some instances, development projects are modified to protect natural features, and in some instances natural features are removed to accommodate site development needs. When the loss of natural features is necessary, that loss is mitigated through site design features and new plantings, and the city's tree canopy overall is being enhanced through the planting of new and mitigation trees.	
86	Update header to read: "City Efforts to Protect Natural Features, Underway or Planned" Revise bullet #1, update to say: The 10,000 Tree Program, which has surpassed its distribution goal with 11,000 trees planted on private property to date. Revise bullet #10, update to say: The Greenbelt Millage, which protects surrounding farmland and the city's water supply	It's an eclectic mix of things and needs more clarity. The heading says, "City Efforts..." which would indicate they're current efforts underway, but the list includes things past and present tense so it's confusing.
98	Remove the term "critical" in reference to natural features.	"Critical" is a subjective term in conservation, and depends on multiple factors such as geographic scope, eco-region, conservation goals and more. What might be deemed critical by one observer or expert may not be deemed critical by another. As such, City staff recommend it be removed from the statement in Goal 10 and other references made to "critical" natural features throughout the Comprehensive Plan. If a qualifier is necessary, City staff would recommend

Page	Edit	Rationale
		using “high priority” or similar, as it can more readily be defined internally by City staff.
111	Change color for the toss-up (residential or transition) districts on map to be more intuitive	Color looks like a combo of residential and hub not residential and transition
112-113	Under Hub / Preferred Building Form – Bullet 4, delete “Prefer active first floor uses”	Refers to use, not form – and is repeated in the next column over.
113	Tapering for Transition should adjust short to tall based on distance to Residential, and tall to short based on distance to Hub. Page 118 contains better language on this.	We should be clear that the intention is to taper down to shorter heights as we get closer to Residential parcels, and to permit Hub level heights if adjacent to Hub.
Housing Appendix	I think we discussed this at the table, but I think we need to move the housing research appendix link up.	It feels buried and hard to find.

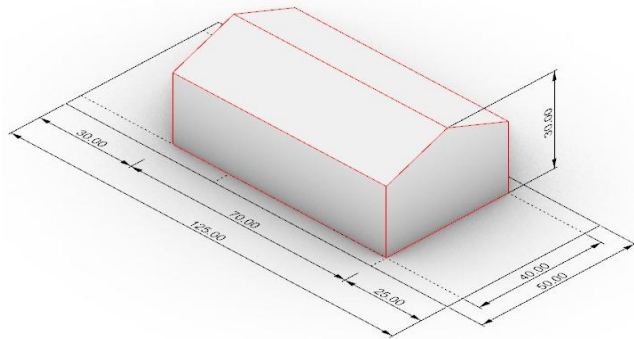
Factual Edits

Page	Edits	Rationale
6	I still find the bold ALL CAPS very difficult to read. Can this please change to Title Case?	Readability
7	“acquisition” is misspelled	Typo
15	Blue text at bottom right, revise to say, “Ann Arbor’s current zoning ordinance, the UDC, has...”	Makes it clear that this is presenting current condition – not proposed; and also avoids using UDC since most people don’t know what that means.)
22	The charts at the bottom should separate the “If A2 were 40% of the county...” numbers at the bottom, using a break, color, or italics. Some way of differentiating those numbers from the data.	These numbers are not SEMCOG or US Census data. These numbers are a way of illustrating a point – that the declining % share of County population is due to constraints on new housing production, not on demand...)
35	Under “Sustainable,” third from the bottom, remove “Need for” so that it just reads, “Multimodal transportation and complete neighborhoods.”	Consistent with the rest of the list in answering the question, “What does having a more Sustainable Ann Arbor mean?”

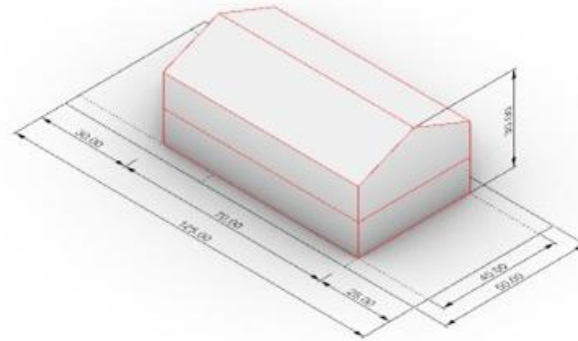
Page	Edits	Rationale
	Bottom, re-word or remove “Concern about impact on affordability” (Suggested revision if you want to keep it: “Potential negative impacts on affordability.”	This list is supposed to answer the question, “What does having a more Sustainable Ann Arbor mean?” and it doesn’t make sense as written.
61	Errant bolding for “Fewer”	“F” can be unbolded
103	“Existing City Program” since 2 are in this box, should be programs?	Typo
74	Change BIPOC reference to the Appendix (page 74)	The original citation is already there.
154, Goal 11	“Guidance for private development as to how they integrate into the city’s SEU plans and where private development needs to carry the responsibility of clean energy on their own Developments”	Typo – missing a verb like provide
163	Form-Based Code is missing a word. First sentence should read, “...relationship between building facades and the <u>public</u> realm...”	Typo

These generic massing diagrams are shown on a 50 ft x 125 ft lot with 25 ft front setback, 30 ft rear setback and 5 ft side setbacks. This results in a building footprint of 2800 sf. This diagram represents a conservative building size in R1D/R1C districts. As shown, a quadplex would fit within the volume of a single-family home.

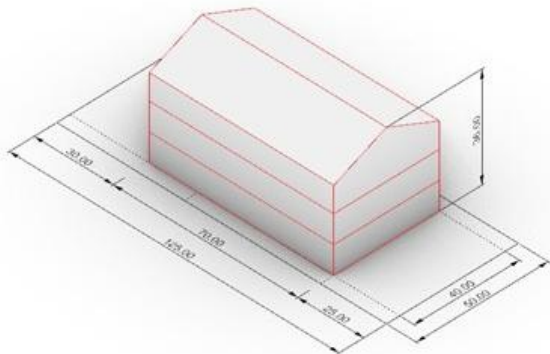
Single Family



Duplex



Triplex



Quadplex

