

Subject: The CLUP not only fails at affordability, it exacerbates the problem

From: Tom Stulberg

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To: Planning <Planning@a2gov.org>

Subject: The CLUP not only fails at affordability, it exacerbates the problem

The CLUP seeks to increase housing but will not only fail to improve the affordability of Ann Arbor's modestly priced housing; it will make things worse for those trying to afford to live here. The supply of modestly priced housing will be reduced because that is the housing that will be torn down and replaced by more expensive housing. Little new supply at the modest price points, for rent and for ownership, will be built as a result of this plan. Supply and demand works within market segments. Thus, this plan will accelerate the price increases for the more modest segment of the market for both renters and owners. The CLUP should not incentivize the loss of existing attainably priced housing and instead prevent displacement.

The language in the CLUP continues to be far too weak for non-principal-residence short-term rentals. There should be a statement for no new NPR STRs to be allowed in areas where they are currently prohibited, or a moratorium on NPR STRs. We want to create more long-term housing, not lose long-term housing to profit-driven short-term rentals.

The affordable housing benefits from flexible development options such as PUDs will be lessened. We will get less affordable housing units and dollars from developers because the plan will give upzoning for free, without the trade-offs we could get now. With the new CULP, we will have less PUDs, with standard upzonings achieving the same extra height or density, and thus we get less affordable housing units and dollars. We have an affordability crisis. We should be getting more affordable housing from upzoned developments, not less. We should be adding more options into the plan to provide affordable and/or workforce housing in trade for the upzoning. But the plan gives it away for free.

The language on page 138, 1.3.4, reads: "Remove the height exceptions in the Residential Category to minimize adverse shading impacts on adjacent properties."

This language is wrong. There is an option in our zoning code that allows for a 30% height increase in exchange for a community benefit of either sustainability or affordability. Removing this "height exception" will not at all be helpful to "minimize adverse shading impacts on adjacent properties" because the CULP has another change (allowing three stories with no numerical height limit) that will allow the same height that is currently achievable with this "height exception" bonus to be achieved, after the CLUP passes, but WITHOUT the required community benefit. The affordable housing benefit and sustainability benefit will be lost. We gain no effective limit in heights but lose everything in the community benefits currently required in trade to achieve that bonus height. **This is yet another loss of incentives for affordability and/or sustainability**, while giving the extra height away for free.

The CLUP is highly flawed, particularly in affordability. These are but a few examples.

And if people can't afford to live here, we can't significantly reduce the number of commuters - and thus we can't meet our sustainability goal either.

Thank you,

Tom Stulberg