

**Subject:** Proposed Comprehensive Plan  
**Attachments:** Memo re Proposed Comprehensive Plan - May 5.pdf

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**From:** Brad M. Tomtishen  
**Sent:** Sunday, May 11, 2025 11:33 AM  
**To:** Taylor, Christopher (Mayor) <CTaylor@a2gov.org>; City Council <CityCouncil@a2gov.org>; Planning <Planning@a2gov.org>; Lenart, Brett <BLenart@a2gov.org>; Bennett, Michelle <MBennett@a2gov.org>; Delacourt, Derek <DDelacourt@a2gov.org>; mdoheny@a2gov.org  
**Subject:** Proposed Comprehensive Plan

All:

I am writing to express my opposition to the Proposed Comprehensive Plan currently being considered by the City. Although I was not involved in drafting the attached Memo re the Proposed Comprehensive Plan dated May 5, 2025 and signed by 19 Ann Arbor residents, I support fully its arguments and conclusions.

Setting aside the substance of the proposal, with which I disagree, I am outraged by the lack of notice to the public and the limited input sought. This is a radical plan that could completely change the character of every neighborhood in the city, yet I heard of it by random chance and many of my neighbors had no idea this process was underway.

I urge you to pause this process while you disclose the proposal and its implications to the public and seek input from all residents.

Sincerely,

Brad M. Tomtishen

May 5, 2025

Mayor Christopher Taylor  
Ann Arbor City Council  
Ann Arbor City Planning Commission and Staff  
Brett Lenart, AICP, Planning Manager  
Michelle Bennett, AICP, Senior Planner  
Derek Delacourt, Community Services Area Administrator  
Atleen Kaur, City Attorney  
Milton Dohoney Jr., City Administrator  
c/o City Hall  
301 E. Huron Street, Ann Arbor

cc: Interface Studios LLC, SmithGroup, Ninigret Partners LLC, &Access Inc.

**Re: Proposed Comprehensive Plan**

Dear Public Officials:

For the reasons set forth below, the undersigned believe that the draft Comprehensive Plan, as dated April 7, 2025, and made available to the public on April 9, is woefully deficient, both as a city planning document and as required by Michigan law.

We join nearly 1,900 Ann Arbor residents who have signed a petition asking the City to suspend work on the Plan until such time as these problems are remedied and robust public engagement has taken place.<sup>1</sup> The list of issues below is not exhaustive, reflecting the limited time we have had to review the draft Plan.

**1. Claim – The Plan was properly researched and sourced**

**Fact:** In contrast to the American Planning Association’s guidelines for sustainable city planning,<sup>2</sup> the Plan contains no population projection methodology for its proposals, and lacks any analysis or plan for the kind of job growth needed to require tens of thousands of new housing units. It provides no analysis or estimates of the cost to replace and extend infrastructure for its growth, or how this growth would affect our city’s finances, the tax burden on existing residents, and our long-term fiscal sustainability.

**2. Claim – Ann Arbor will experience rapid population growth**

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<sup>1</sup> See Enactment #R23-131, <https://a2gov.legistar.com/LegislationDetail.aspx?ID=7143617&GUID=605EB21E-7243-4881-99BF-ODD632753091>.

<sup>2</sup> See David R. Godschalk and David C. Rouse, *Sustaining Places: Best Practices for Comprehensive Plans*, American Planning Association, 2015. <https://planning-org-uploaded-media.s3.amazonaws.com/publication/online/PAS-Report-578.pdf>.

**Fact:** The Plan proceeds from the assumption that from 63,000 to 112,500 new residents will move to Ann Arbor between now and 2050.<sup>3</sup> This assumption is not supported by any credible data.<sup>4</sup>

City Planning Manager Brett Lenart cites this unsupported growth assumption as the reason that the city must accommodate unprecedented development in coming years.<sup>5</sup> However, the Plan’s population chart (Plan pp. 10-11) ends in 2020 when Ann Arbor had 123,851 residents, and its assumption for new growth assumes that by 2050 the city will number between 186,851 and 236,351 residents.<sup>6</sup>

The Plan adopts these ambitious population growth assumptions without disclosing any methodology or identifying any data sources.<sup>7</sup>

- The Plan’s growth assumptions are inconsistent with the population projections of the Southeastern Michigan Council of Governments (SEMCOG). SEMCOG’s 2050 Regional Development Forecast projects that Ann Arbor’s population will grow to 135,800 by 2050, an increase of 9.6% over the 2020 base year. The Plan’s failure to refer to the SEMCOG data violates the standards of the American Planning Association – to “coordinate local and regional population and economic projections”.<sup>8</sup>
- Ann Arbor’s long-range population growth is modest and its composition is shifting quickly. Long-term forecasts still show an increase to approximately 135,800 residents by 2050, but SEMCOG’s December 2024 update already records a 1.5 % population decline (July 1, 2024 est.) concurrent with a 2.7 % rise in households since 2020. Smaller households, an aging population, and widening income disparities mean the Plan must focus on households and affordability, not just head-count.<sup>9</sup>

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<sup>3</sup> See Plan, p. 45: “Goals: Increase housing (1,200-1,800 homes per year for 25 years) to maintain a healthy balance between supply and demand in the housing market.” That means a low range of 30,000 new homes and a high range of 45,000 new homes by 2050. Assuming 2.19 occupants for each home, that results in a range of 65,700 to 98,550 new residents. See, U.S. Census Bureau, ACS 2022 1-Yr. Estimates, tbl. DP04 (mean household size = 2.19 for Ann Arbor city). See, <https://www.census.gov/quickfacts/fact/table/annarborcitymichigan/HSD310223#HSD310223>.

<sup>4</sup> In fact, the Plan says, without support, that “*The pace of housing construction has slowed in recent decades and demand for housing likely remains high but has outpaced supply.*” Plan, p. 48.

<sup>5</sup> See, e.g., “30,000 to 97,000 new housing units possible in Ann Arbor, planning official says”. Mlive.com January 30, 2025.

<sup>6</sup> The Plan is silent on where new residents will come from, other than the unsubstantiated statement that: “*Close to 80,000 people commute into the city. . . . Providing housing for many of these commuters would be needed to reduce vehicle miles traveled and carbon emissions.*” See Plan, p. 48.

<sup>7</sup> The Plan refers in several places to the Longitudinal Employer-Household Dynamics (LEHD) data at the U.S. Census Bureau, but does not present the actual data. Footnote 1 of the Plan relies on a 2022 Census Bureau survey to support a rental vacancy rate of 3.1%. The updated SEMCOG Population and Household Estimates December 2024 for July 1, 2024 shows 4.9% vacancy.

<sup>8</sup> See Godschalk and Rouse, supra note 3, pp. 19-20, <https://planning-org-uploaded-media.s3.amazonaws.com/publication/online/PAS-Report-578.pdf>.

<sup>9</sup> State of Michigan Housing Data portal - <https://dev.hra-dashtest.com/report/66033963dca84b6a546aab5f/2603000/population-and-demographics#64b5586cef3e47398d886812>.

- The Plan does not use authoritative sources for its housing data. The State of Michigan Housing Data Portal and SEMCOG Community Explorer for Ann Arbor both state that of the total 49,907 occupied homes, 46% were owner-occupied homes and 54% were renter-occupied homes in 2023. Out of all homes, ~7.0% of homes were vacant.<sup>10</sup>
- Several sources indicate that the current population trend is down, not up. The 2020 Census data (123,851 residents), and the 2023 Census estimate (119,381 residents (-3.6 % in 3 yrs)) confirm this.<sup>11</sup>
- The plan’s failure to refer to SEMCOG data means that it is incompatible with the city’s “Moving Together Towards Vision Zero - Comprehensive Transportation Plan,” which uses SEMCOG data as required by law.<sup>12</sup>

It is important to note that the Plan’s housing goal on page 46 (“Objectives”) is the only data point for new housing included in the Plan. The Plan’s failure to disclose its methodology and data sources (lack of factual basis, lack of coordination with regional planners, etc.) calls the entire process into question.<sup>13</sup>

### **3. Claim – Employment in the city will increase by 30,000 – 50,000 jobs**

**Fact:** Just as the Plan fails to provide accurate current and projected population data (apart from stating that “population growth has plateaued over the last few decades”<sup>14</sup>), it fails to provide evidence for an impending rapid expansion of employment. Nor does it provide any viable economic development plan for producing these new jobs.

The implied employment projection is in direct contradiction with SEMCOG’s current employment trends for the city and more recent financial constraints and budget tightening facing the University of Michigan, the city’s dominant employer. Michigan’s outgoing President Santa Ono has recently confirmed that more cuts are coming.<sup>15</sup>

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<sup>10</sup> Michigan Housing Data Portal: <https://dev.hra-dashtest.com/report/66033963dca84b6a546aab5f/2603000/housing-supply#64b5586def3e47398d886a7f>; SEMCOG portal: [https://maps.semcoq.org/CommunityExplorer/?community=4005&shortcut=Percent\\_Vacant](https://maps.semcoq.org/CommunityExplorer/?community=4005&shortcut=Percent_Vacant).

<sup>11</sup> See note 7 above.

<sup>12</sup> “Moving Together Towards Vision Zero – Comprehensive Transportation Plan,” [https://www.a2gov.org/media/5u0lpb2q/ann-arbor-moving-together\\_final-plan\\_june-2021.pdf](https://www.a2gov.org/media/5u0lpb2q/ann-arbor-moving-together_final-plan_june-2021.pdf).

<sup>13</sup> See Michigan Planning Enabling Act Sec. 39 (2)(d) “*Before preparing a master plan, a planning commission shall send to all of the following, by first-class mail or personal delivery, a notice explaining that the planning commission intends to prepare a master plan and requesting the recipient’s cooperation and comment: (d) For a municipality undertaking a master plan, the regional planning commission for the region in which the municipality is located ....*”

<sup>14</sup> Plan, page 14.

<sup>15</sup> Santa Ono, “Our Advocacy, Responsibility and Commitment” <https://president.umich.edu/news-communications/messages-to-the-community/our-advocacy-responsibility-and-commitment/>; also see <https://publicaffairs.vpcomm.umich.edu/key-issues/updates-related-to-federal-orders-memos-and-agency-guidance/>

### Federal Funding Actions Affecting U of M:

Date 2025	Federal action	\$ at risk / yr	Local jobs at stake*
Feb 21	SSA ends \$15 M Disability R&D consortium	≈ \$15 M	≈ 110 FTEs
Mar 14	FY-25 CR cuts \$13 B non-defense; NIH indirect-cost cap to 15 %	≈ \$181 M†	≈ 1 250 FTEs
Mar 31	NIH cancels 145 HIV & DEI grants (9 at U-M)	≈ \$26 M	≈ 180 FTEs
Feb 24-27	U-M hiring freeze & capital “pause”	n/a	slows ≈ 450 hires

SEMCOG’s projections show that Ann Arbor will see 18,726 new jobs by 2050, a 13.8% increase from the 2020 baseline year.<sup>16</sup> Recent job growth in the region has been positive but modest – certainly not on pace to fuel a 60% population boom. From July 2023 to July 2024, total nonfarm employment in the Ann Arbor metro (Washtenaw County) *decreased* slightly (–0.4%).<sup>17</sup> The region had about 226,400 jobs in July 2024 vs. 227,400 the year before.<sup>18</sup> It’s worth noting that SEMCOG’s 2050 Forecast was adopted on March 23, 2023 and does not yet account for the current economic downturn.

Over a five-year span, job gains have been limited. In 2018 (pre-pandemic) the Ann Arbor metro had roughly ~225,000 jobs; by 2023 it was ~227,000 – a net 1% rise over five years (after dipping in 2020 and recovering).<sup>19</sup> In short, employment grew only marginally (~0.2% annually) in 2018–2023, far below the rate needed to support rapid population growth. The University of Michigan’s Research Seminar in Quantitative Economics (RSQE) recently forecast a county-wide downturn in job growth

<sup>16</sup> See, [https://maps.semco.org/forecast/?geoid=4005&geotype=city&ind=pop\\_change](https://maps.semco.org/forecast/?geoid=4005&geotype=city&ind=pop_change).

<sup>17</sup> ([Metropolitan Area Employment and Unemployment - July 2024](#)).

<sup>18</sup> *Id.*

<sup>19</sup> See SEMCOG in note 15 above.

through 2027.<sup>20</sup> The state recently announced that Michigan’s unemployment rate is next to worst in the country.<sup>21</sup>

#### 4. Claim – Ann Arbor will add 30,000 to 45,000 units of new housing

**Fact:** In line with its population forecast, SEMCOG projects that Ann Arbor will add 4,695 households by 2050, or only a 9.4% increase from the 2020 baseline year. This authoritative data is at sharp variance with the Plan’s estimate of the housing the city will need: the low-end figure of 30,000 housing units is 6.4 times greater than SEMCOG's projection, while the high-end figure of 45,000 units is 9.6 times greater than SEMCOG's. The Plan's wildly inflated low-end target represents 137% of the total projected household growth for all of Washtenaw County, and the high-end target represents 206% of this growth.<sup>22</sup>

The Plan offers no methodology for reaching its inflated housing needs assessment. By way of example, a 2024 memo to the Comprehensive Plan Steering Committee stated that 7,670 housing units were then in the pipeline for development.<sup>23</sup> The Plan changes this number to 5,300 units, a reduction of 2,370 units with no explanation of the discrepancy, which seems intended to help paint a misleading picture of a housing shortage.<sup>24</sup> (This reduction is close to the 2,300 beds—not units—that the University of Michigan is building.<sup>25</sup>) In addition, the Plan fails to mention or account for housing planned to be built by the University as set forth in its Campus Plan 2050.<sup>26</sup>

#### 5. Claim – Infrastructure spending will accommodate this rapid growth

**Fact:** The Plan fails to address what its projected growth will cost and does not discuss how infrastructure costs will be met. Except as noted below, the Plan does not provide any analysis nor otherwise mention either projected infrastructure capital costs or the current capacity of Ann Arbor’s aging infrastructure.

- Analysis of City of Ann Arbor documents, regional data from SEMCOG, peer city comparisons and national infrastructure cost benchmarks, suggests that each new unit of housing requires from \$81,000 to \$113,000 (2025 dollars) per unit in new infrastructure spending, broken down as follows:
  - City buildings \$27–38 k

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<sup>20</sup> See Washtenaw County Economic Outlook: [https://lsa.umich.edu/content/dam/econ-assets/Econdocs/RSQE%20PDFs/RSQE\\_Washtenaw\\_Forecast\\_April25.pdf](https://lsa.umich.edu/content/dam/econ-assets/Econdocs/RSQE%20PDFs/RSQE_Washtenaw_Forecast_April25.pdf)

<sup>21</sup> “Michigan Unemployment Rate Advances During March.” [https://milmi.org/docs/publications/Press\\_Releases/State0325.pdf](https://milmi.org/docs/publications/Press_Releases/State0325.pdf).

<sup>22</sup> See notes 1-6 above. For comparison, the stated goal of 1,800 units per year means 150 new units per month for 25 years.

<sup>23</sup> City of Ann Arbor, presentation to the Steering Committee, March 20, 2024 (pdf).

<sup>24</sup> Plan, page 48.

<sup>25</sup> *University Record*, February 18, 2023, <https://record.umich.edu/articles/new-residential-quad-adding-2300-beds-more-planned/>.

<sup>26</sup> See University of Michigan, Campus Plan 2050. <https://campusplan2050.umich.edu/files/campusplan2050.pdf>.

- Water utility \$21–30 k
  - Streets & bridges \$9–13 k
  - Parks & recreation \$4–5 k
  - Other utilities & solid waste \$20–30 k
  - Subtotal \$81–113 k
- Multiplying the high and low projected number of new housing units by per unit estimated costs shows that the city will face a funding gap of between \$2.43B and \$5.09B for new infrastructure, or approximately \$81M to \$170M in property tax or other revenue each year until 2050.
  - Even though the Plan notes that “any implementation of this plan must carefully align with analysis and projections of infrastructure investment needs,” the Plan provides no needs analysis or fiscal analysis.<sup>27</sup> Indeed, the infrastructure required to support the projected growth is only mentioned in vague and general terms:

***...public infrastructure investments will be needed to support growth, there is also concern over the high tax burden and care must be taken to reduce waste, increase efficiency and minimize tax burden.***<sup>28</sup>

***...The future land use map offers a vision of the city unconstrained by existing infrastructure limitations, enabling growth and transformation in alignment with community values. While limiting the map to current infrastructure would hinder the city’s ability to evolve and achieve its broader vision, it remains essential to acknowledge that existing infrastructure and other constraints will influence the realization of that vision. Some infrastructure investments may be phased in over time to accommodate growing demands, while in other cases, upfront investment may be necessary to support the envisioned growth.***<sup>29</sup>

- The Plan also fails to account for and provide costs for replacing Ann Arbor’s existing infrastructure, much of which is at or near the end of its designed lifetime.<sup>30</sup>

## **6. Claim – Increasing the housing supply will make housing more affordable**

**Fact:** The Plan is premised on values determined by the City Council and not substantive, evidence-based goals. It fails to define affordability or propose ways to provide needed moderately-priced housing, particularly for young people who are unable to afford to rent or buy in Ann Arbor. Instead, it resorts to weak justifications for greatly expanding housing development with no evidence that adding market-rate housing will improve affordability, and fails to acknowledge

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<sup>27</sup> Plan, p. 82.

<sup>28</sup> Plan, page 79.

<sup>29</sup> Plan, page 106.

<sup>30</sup> Comments of Planning Commissioner Richard Norton on April 29, 2025, <https://www.youtube.com/watch?v=eZpZNgN4MDI&t=9073s> at 2:26:38.

that inviting speculative development risks displacing moderate-income households in vulnerable neighborhoods.

Ann Arbor needs roughly 4,000 income-ability deed-restricted homes by 2050 to meet long-term equity targets. Since the 2020 housing-millage vote, the city has delivered 450 deed-restricted units and has 645 more in the pipeline. At the current pace (about 150 affordable units per year) the city will miss its 2030 pledge by about 405 units unless new funding and land deals accelerate. The city will face an even larger shortfall beyond 2030.<sup>31</sup>

The basis for the Plan's ambitious housing target rests on the classical supply and demand model, which suggests that increasing housing supply will result in lower prices, all else being equal. However, among other shortcomings for explaining the housing market, this static model ignores the market power of developers to determine prices, and externalities such as speculative investment. Importantly, it also ignores how income disparities affect demand. Recent research challenges this conventional relationship. Indeed, City Planner Michelle Bennett, among other Planning staff, has stated that "If we allow housing in every single square inch of this city, we might still not solve this housing crisis. . . housing might still be quite expensive for a lot of people."<sup>32</sup>

Emerging research also suggests that supply-focused policies supporting more market-rate housing, particularly where there is little evidence for new job and population growth, will not improve affordability in areas like Ann Arbor. A March 2025 working paper from the National Bureau of Economic Research directly challenges the view that housing supply constraints are the primary driver of housing price differences across U.S. cities. The research found that income growth plays a more significant role in predicting changes in house prices than supply constraints. The study's authors concluded that "from 2000 to 2020, we find that higher income growth predicts the same growth in house prices, housing quantity, and population regardless of a city's estimated housing supply elasticity. We find the same pattern when we expand the sample to 1980 to 2020, use different elasticity measures, and when we instrument for local housing demand."<sup>33</sup> In other words, inequality of access to housing is not about supply constraints, it's about income inequality. While added housing supply may impact affordability in certain housing markets, it is unlikely to do so in

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<sup>31</sup> City of Ann Arbor, Affordable Housing Millage Overview 2 (2020), <https://www.a2gov.org/media/lqugidbd/rfp-rental-development-millage-funds-24-01.pdf>; czb LLC, Washtenaw Housing Affordability & Equity Findings 9-11 (2015), <https://www.a2gov.org/media/n2fhua01/washtenaw-county-housing-affordability-and-equity-findings-and-recommendations.pdf>; Michigan State Housing Dev. Auth., Missing Middle Housing Program Awards (2024), <https://www.michigan.gov/mshda/developers/missing-middle>; Michigan State Housing Dev. Auth., MI Statewide Housing Plan (2023), [https://www.michigan.gov/mshda/-/media/Project/Websites/mshda/developers/Statewide-Housing-Plan/MI-Statewide-Housing-Plan\\_Final-112723.pdf](https://www.michigan.gov/mshda/-/media/Project/Websites/mshda/developers/Statewide-Housing-Plan/MI-Statewide-Housing-Plan_Final-112723.pdf); US Census Bureau, ACS 2023 1-Year: DP03; U-M & Urban H3, Michigan Statewide Housing Needs Assessment 14-17 (2024), [https://www.urbanh3.com/files/ugd/9d463d\\_02fdfe4f619f4adf885a96677c710479.pdf](https://www.urbanh3.com/files/ugd/9d463d_02fdfe4f619f4adf885a96677c710479.pdf).

<sup>32</sup> Ann Arbor City Planning Commission meeting January 23, 2025, at 2:42.00. <https://www.youtube.com/watch?v=NH34npp8vyyw>.

<sup>33</sup> See, Schuyler Louie, John A. Mondragon and Johannes Wieland, "Supply Constraints do not Explain House Price and Quantity Growth Across U.S. Cities", National Bureau of Economic Research, Working Paper 33576, March 2025. At <https://www.nber.org/papers/w33576>.

the short term and fails to provide realistic solutions for providing additional supply in housing sectors where need is most acute.

## **7. Claim – The Plan is consistent with the Ann Arbor’s A2Zero and TheRide’s 2045 Long Range Plan**

**Fact:** Analysis of the A2Zero Climate Action Plan, SEMCOG forecasts, and verified municipal projects reveals that Ann Arbor's current per capita emissions of ~17.5 metric tons CO<sub>2</sub>e/year would require a \$40,250-\$256,000 per housing unit investment to achieve net-zero alignment by 2030. Scenario modeling promises a 72% emissions reduction under the Plan, but significant funding gaps and equity challenges persist. The population growth the Plan projects would cause significantly greater vehicle miles traveled – inconsistent with TheRide 2045 Long Range Plan.

Because the building sector already drives approximately 40 % of global CO<sub>2</sub> and 11 % of that is “embodied” in materials, erecting 30,000-45,000 housing units in Ann Arbor—factoring in construction VMT and on-site fuel—would release an estimated 0.93–1.39 Mt CO<sub>2</sub>-e, equal to adding about 200,000–300,000 passenger cars for a year and consuming approximately 2–3.5 % of A2Zero’s entire 2025-2050 carbon budget (42 Mt) while matching ≈ 44–66% of the city’s 2019 community-wide emissions.<sup>34</sup>

Further, the Plan fails to incorporate the Natural Features Master Plan (2004). Nor does it model scenarios for the loss of greenspace or urban tree canopy that would result from building new housing on the scale that the Plan anticipates. The impact of adding acres of impermeable surface further burdens an aging stormwater system, and exacerbates flooding risks.

## **8. Claim – The Plan is consistent with its stated values**

**Fact:** The Plan's implementation will directly undermine (and certainly not promote) its stated core values:

**Affordability:** By increasing the value of the land and spurring market-rate housing, the Plan will undermine its own goals. The \$81,000 to \$113,000 per unit in infrastructure costs will make housing more unaffordable either through impact fees or increased property taxes. Without economic growth, the tax burden will shift to existing residents. Affordability goals cannot coexist with massive infrastructure spending requirements.

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<sup>34</sup> Am. Inst. of Architects, *ROI: Designing for Reduced Embodied Carbon* (Nov. 30 2023), <https://www.aia.org/resource-center/roi-designing-reduced-embodied-carbon>; Rocky Mountain Inst., *The Hidden Climate Impact of Residential Construction* tbl. 1 (2023) (184 kg CO<sub>2</sub>-e m<sup>-2</sup> benchmark), <https://rmi.org/insight/hidden-climate-impact-of-residential-construction/>; Fiona Greer & Árpád Horváth, *Exploring the Significance of Transportation Emissions in Up-Front Embodied Carbon in Buildings*, 269 *Building & Env't* 112457 (2024) (3–5 % transport share), <https://doi.org/10.1016/j.buildenv.2022.112457>; US EPA, *Greenhouse Gas Equivalencies Calculator* (visited 4 May 2025) (4.6 t CO<sub>2</sub>-e per car-year), <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>; City of Ann Arbor, *2019 Community-Wide Greenhouse Gas Inventory Report 3* (2020) (2.1 Mt CO<sub>2</sub>-e baseline), [https://www.a2gov.org/media/hbclzcf/2020\\_ghg-inventory\\_2019-report\\_v1.pdf](https://www.a2gov.org/media/hbclzcf/2020_ghg-inventory_2019-report_v1.pdf).

**Equity:** Infrastructure costs will disproportionately burden fixed-income residents, particularly seniors, and low- and moderate-income households. Tax and utility rate increases will force displacement of economically vulnerable populations. Further, loosening of land use requirements and removal of review and approval procedures will leave the city’s lower and moderate income areas exposed to displacement by speculative investment.

**Sustainability:** Water, sewer, stormwater systems have physical capacity limits that cannot accommodate the envisioned growth if it were able to occur. Massive construction will generate substantial embodied carbon, contradicting A2Zero goals. Capital costs will divert funds from operational sustainability initiatives, among other competing needs which the Plan does not discuss. Neglecting to include protection of natural features as essential to resilience, health, and welfare undermines the Plan’s values.

**Dynamism:** Economic trends (declining employment, University constraints) contradict growth assumptions. The Plan does not identify industries to occupy commercial spaces or employ new residents. Actual development will be constrained by market reality, resulting in partial implementation at best.

## **9. Claim – The Plan meets professional planning standards and Michigan law**

**Fact:** The Plan does not comply with the RFP, Proposal, Contract, SoW, and Addendum with Interface Studios. The city’s RFP No. 22-73, accepted by Interface Studios, requires a “complete, data-driven Comprehensive Plan” that adheres to Michigan law and American Institute of Certified Planners standards. The Plan does not follow the guidelines set forth in the American Planning Association’s (APA) “Sustaining Places: Best Practices for Comprehensive Plans,” which “offers a framework with standards for creating livable, healthy communities in harmony with nature—communities that have resilient economies, social equity, and strong regional ties.”<sup>35</sup>

The Plan fails to meet the requirements of the Michigan Planning Enabling Act (2008), particularly Section 33, detailing requirements for master plans.<sup>36</sup> Importantly, it does not meet the requirement that a comprehensive plan include guidelines and strategies for providing “a range of housing types, costs, affordability, attainability, ages, and other characteristics, including single- and multiple-family dwellings, to serve the housing demands of a diverse population.”<sup>37</sup>

## **10. Claim - Community engagement has been substantial and consistent**

**Fact:** Community engagement has been minimal and did not present the facts of the Plan. The Michigan Planning Enabling Act mandates public notice, hearings, and opportunities for community input in the master planning process. The city failed to take the minimal measure of mailing notices to all residents to inform them and seek their engagement in the planning process.

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<sup>35</sup> <https://www.planning.org/publications/report/9026901/>. See also Godschalk and Rouse, *supra* note 6.

<sup>36</sup> <https://www.legislature.mi.gov/documents/mcl/pdf/mcl-Act-33-of-2008.pdf>.

<sup>37</sup> 102nd Legislature, Regular Session of 2024, Enrolled House Bill No. 5557, <https://www.legislature.mi.gov/documents/2023-2024/publicact/htm/2024-PA-0153.htm>.

Today, most residents remain unaware of the process that is underway and its implications for the city's future.

In 2024, Interface Studios consultants conducted an unscientific survey that failed to meet minimal quality standards. It did not use random sampling and had self-selection bias with no response control to screen repeat submissions including from non-local respondents or bots. The survey was explicitly oriented to include non-residents. Of the 3,150 respondents, 2,667 self-identified as Ann Arbor residents—only slightly more than 2% of Ann Arbor's population. Most questions were demographic or asked general value questions about housing and city resources. It omitted questions that focused on neighborhoods. Notably, it included no questions about priorities that City Council had set for the Plan, or about key issues for achieving these priorities such as zoning or density. An online "Meeting In a Box" outreach effort, again with no response control, had just over 200 responses to broadly-couched questions about options for adding larger buildings and neighborhood greater density. Map exercises with sticky dots did not result in any credible and quantifiable response data.

Notably, genuine and meaningful inclusivity was not a priority—no meetings were held in the city's neighborhoods or subcommunity areas to learn what residents considered to be challenges and priorities for residents in planning for the years ahead.

At sparsely attended workshops and open houses, which attracted about 300 visitors, consultants showed plans for increasing height limits in residential areas to 35' and allowing multiplexes with up to 4 units. From this limited and inadequate outreach, consultants concluded that *"the majority of people we engaged are comfortable with "gentle density" in single-family areas. In the planning process, gentle density was communicated as a modest increase up to 4 units - based on changes made in other cities (side bar, p. 51)."*<sup>38</sup>

## **11. Claim - The Plan responds to public input**

**Fact:** The Plan's consultants and the Planning Commission have solicited feedback on unsubstantiated claims and failed to provide the public basic and accurate facts, analysis, and context. Further, the Plan ignores even the inadequate public input described above. For example, in its draft Plan the Planning Commission moved to allow larger buildings in residential areas. Planning Manager Lenart confirmed to the Commission that its consensus for height and density now deviated from the limits that had previously been presented to the public. Allowing buildings up to four stories tall with no zoning limit as to number of units in all residential districts would substantially increase the scale of allowed structures:

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<sup>38</sup> Plan, page 47 *"During the engagement process, the planning team communicated a modest increase (up to 4 units) as "gentle density," using the changes made by other cities such as Austin, Minneapolis, Portland and Seattle."*

*There was conversation about the appropriateness of Lockwood (see photo below) to be imposed in that. I am interpreting the balance of your conversation as, that's fine - if Lockwood goes into a neighborhood that's fine as long as it is meeting, whatever those form-based requirement height, that is fine so we are not going to be trying to somehow arbitrarily scale down the size of buildings beyond some large parameters to provide the most flexibility.<sup>39</sup>*



*Lockwood of Ann Arbor, 2195 E Ellsworth*

The Plan states that “buildings are limited to four stories in [a residential] district.”<sup>40</sup> The Plan’s Future Land Use Character Breakdown (p. 102) has no limit on building height in residential districts, it simply says “low rise.”<sup>41</sup> The Plan does not define what it means by “four stories”, and does not set any limit on the height or number of units in a residential building. Discussion at the April 29, 2025 Planning Commission meeting suggests that there may be a revision from four stories to three stories, with four stories still achievable via an option provided for in the zoning code.

Perhaps more troubling are the Plan’s references to “form-based” controls. The Plan states:

*To achieve City Council’s directive to add new homes in single family zoned areas, the city should permit increased units by right and smaller minimum lot sizes in all residential districts, utilizing **building form controls** to maintain low-rise development that is not a drastic change in scale from what exists in neighborhoods now.<sup>42</sup>*

Form-based controls may be defined carefully in zoning codes, or not. At best, they can increase predictability and decrease discretionary decision-making by staff, to the extent they provide clear, objective standards. At worst, they can give discretion over permissible height, setbacks, and other zoning elements to city administrators, who can then approve or deny a building application.

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<sup>39</sup> Brett Lenart, Planning Commission meeting January 23, 2025, at 2:51, <https://www.youtube.com/watch?v=NH34npp8vyw>.

<sup>40</sup> Plan, p. 104.

<sup>41</sup> Plan p. 106.

<sup>42</sup> Plan, p. 47 (emphasis added).

The Plan cites Minneapolis, Portland, Seattle and Austin as examples of cities that have adopted form-based controls.<sup>43</sup> This is true in part and false in part:

- **Minneapolis:** Has *some* form-based elements, especially in recent overlays and the 2040 Plan's built form regulations, but its zoning code is still largely conventional, with use-based categories and numeric height/lot coverage standards.<sup>44</sup>
- **Portland:** Uses form-based elements in select areas (e.g., mixed-use zones, design overlay zones), but overall retains a hybrid conventional zoning framework.<sup>45</sup>
- **Seattle:** Has incorporated form-based techniques (like floor area ratio limits, modulation, design standards), especially in urban centers, but it still uses traditional zoning tools like height limits and use tables.<sup>46</sup>
- **Austin:** Attempted a full transition to a form-based code with the now-defunct “CodeNEXT” overhaul, but that failed politically and legally. Some *form-based pilot zones* exist, like in Austin’s Transit-Oriented Development (TOD) districts.<sup>47</sup>

So, the Plan’s box on page 46, which attributes the use of form based controls to all of these cities, is misleading at best.

## 12. Claim – “Don’t panic - the Plan is just a roadmap”

**Fact:** Planning staff, Planning Commissioners, and City Council members often explain the Plan’s failure to provide specifics or data and analyses that back up its claims by assuring that the Plan is just a roadmap—specific zoning changes come later. The message to the community is to ignore the Plan’s deficiencies. To paraphrase: don’t panic about what you are hearing about or seeing, we are going to sort it out in the zoning later. However, the Plan plainly states in its first section that Ann Arbor:

*...should permit increased units by right and smaller minimum lot sizes in all residential districts, utilizing building form controls to maintain low-rise development that is not a drastic change in scale from what exists in neighborhoods now . . . The City will need to*

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<sup>43</sup> Plan, p. 46.

<sup>44</sup> See Minneapolis, Minn. Code of Ordinances, Title 20, Zoning Code, Chapter 552, Article V (Height of Principal Buildings), Chapter 552.410, Maximum Height for Principal Structures (35’ limit for 2.5 stories, 42’ height limit for 3 stories).

<sup>45</sup> See Portland Zoning Code, Title 33, Chapter 33.110, Summary of Single Family Dwelling Zones (30’ height limitation).

<sup>46</sup> Seattle Building Code, Chapter 5, Section 503.

<sup>47</sup> Austin’s proposed zoning plan was held to violate Texas state law. <https://www.kut.org/austin/2022-03-17/austin-city-council-codenext-zoning-plan-violated-texas-law>, and “Austin officials backing away from controversial rewrite of land-use regulations” <https://www.texastribune.org/2018/08/01/>.

*review and rewrite the zoning code and also streamline the development review process to more easily develop these different types of housing.*<sup>48</sup>

The Plan is also clear that the rewritten zoning code should **exclude single family residential zoning entirely**:

*A key area of change is the move away from single-use districts, whether strictly commercial—such as shopping centers and other auto-centric developments—or strictly residential, like exclusively single-family neighborhoods.*<sup>49</sup>

Statements such as the above give direction toward substantial, disruptive, sweeping changes that will affect the lives of residents in every district in the city.

### **13. Claim – The Planning Commission is free from conflicts of interest**

**Fact:** Planning Commission Chair Wonwoo Lee is conflicted and refuses to recuse himself from shaping the Plan. On LinkedIn, Chair Lee describes his current position with the Song Family Office as follows: “*Managing Director of Real Estate at the Song Family Office, responsible for the creation of a real estate venture arm of the family office. Responsible for real estate strategic planning, transactions, advisory services, and asset management.*” Chair Lee’s immediately previous position, as also described in his LinkedIn profile, was Chief Real Estate Officer for Oxford Properties. On its web site Oxford Properties describes itself as “the dominant force in all areas of investment real estate in Ann Arbor.”

Chair Lee should recuse himself from participation in preparing the Plan. His background, interests and commitments are to real estate developers and development. As chair, Commissioner Lee should not just be fair and impartial in his role on behalf of the whole city, but be seen to be impartial. The credibility of the planning process depends on the chair and members of the Commission being both neutral and appearing to be neutral. We believe his background and current employment leads Chair Lee to strongly favor development interests, and this precludes a balanced approach. Detailed guidelines on conflicts of interest to ensure ethical conduct among its members are in Article 5, “Ethics and Conflicts of Interest,” of the Commission’s Bylaws.

Furthermore, many other members of the Commission are themselves professionally involved in urban planning, architecture, and rental property ownership. This is at odds with the applicable Michigan statute, which states:

*The membership of a planning commission must be representative of important segments of the community, such as the economic, governmental, educational, and social*

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<sup>48</sup> Plan, p.52, “Strategies,” Section 1.1, See Planning Enabling Act.

<sup>49</sup> Plan, page 98, See also, Lisa Disch, “Yes, this plan proposes to get rid of single-family zoning districts.” <https://www.mlive.com/news/ann-arbor/2025/04/even-with-limits-ann-arbor-density-plan-is-big-leap-forward-planning-manager-says.html?outputType=amp>.

*development of the local unit of government, in accordance with the major interests of the local unit of government, such as agriculture, natural resources, recreation, education, public health, government, transportation, industry, housing, and commerce. The membership must also be representative of the entire territory of the local unit of government to the extent practicable.*<sup>50</sup>

This is also part of the Planning Commission's bylaws.

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We conclude that the Plan does not meet professional planning standards and undermines its own stated values. We respectfully request that the City Council direct the Planning Commission to suspend work on the Plan until its numerous deficiencies (only some of which are outlined above) are remedied.

We also urge that work to draft the Comprehensive Plan restart only after robust and genuine public engagement takes place to determine goals and priorities that reflect an actual community consensus. If these steps are not taken to correct the Plan, and since the Plan fails to meet professional planning standards, we demand that the entirety of funds paid to the Plan's consultants be returned to the people of the City of Ann Arbor.<sup>51</sup>

Signed:

Ann Arbaugh

Chris Crockett

Ralph McKee

Donna Babcock

Richard Dokas

Rita Mitchell

Herb Babcock

Kathleen Engel

Ellen Ramsburgh

Hank Barry

John Godfrey

Tom Stulberg

Brad Pritts

Lisa Jevins

Karen Wight

Barry Checkoway

Nancy Leff

Jeff Crockett

Irma Majer

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<sup>50</sup> 125.3815 (3), <https://www.legislature.mi.gov/Laws/MCL?objectName=mcl-125-3815>.

<sup>51</sup> See Enactment #R23-131, <https://a2gov.legistar.com/LegislationDetail.aspx?ID=7143617&GUID=605EB21E-7243-4881-99BF-0DD632753091>.

**Further reading:**

Web site of the American Planning Association. [www.planning.org](http://www.planning.org).

Boulder, Colorado and Madison, Wisconsin are among several recent notable examples of comprehensive that were initiated, written, or heavily shaped by citizens rather than by professional planners:

- <https://assets.bouldercounty.gov/wp-content/uploads/2018/10/bccp-boulder-county-comprehensive-plan.pdf>
- [https://www.cityofmadison.com/dpced/planning/documents/Comp\\_Plan\\_2025\\_Progress\\_Update\\_EN.pdf](https://www.cityofmadison.com/dpced/planning/documents/Comp_Plan_2025_Progress_Update_EN.pdf)

Interface Studios LLC and Ninigret Partners, LLC (NP) did the much more detailed plan for Grand Rapids:

- <https://www.grandrapidsmi.gov/Government/Programs-and-Initiatives/Community-Master-Plan/Community-Master-Plan-Documents>

Furthermore, the original Grand Rapids draft version (08-2024) is sufficient in the areas where Ann Arbor's plan is lacking:

- <https://www.urbangr.org/documents/urbangr/MasterPlan/BridgeToOurFuture.MasterPlan.Draft.202408.pdf>
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