

Subject: Comments re Draft of Comprehensive Plan
Attachments: Planning Commission Letter 8-18-25.docx

From: Noah Kazis
Sent: Monday, August 18, 2025 10:05 PM
To: Planning <Planning@a2gov.org>
Subject: Comments re: Draft of Comprehensive Plan

Hello,

Please find attached my comments on the proposed changes to the "residential" section of the Draft Comprehensive Plan.

Thank you for considering these thoughts and suggestions.

Noah Kazis

To the Members of the Planning Commission:

Thank you, as ever, for the hard work you have put in through this process. I am writing to comment on the latest iteration of the “residential” land use categories for the draft Comp Plan. These comments first discuss the “residential” category discussed in Staff’s August 12 memorandum, then the “new residential” category.

“Residential”

With respect to residential, I would like to first reiterate my thoughts on the draft’s treatment of existing single-family neighborhoods and then, separately, highlight a particular section of text for clarification.

Personally, I do not support the decision to walk back the liberalization of zoning in these neighborhoods, as I believe that both four story buildings and small apartments are desirable uses for these neighborhoods. I need not dwell on the benefits of density—with respect to affordability, to sustainability, and to building the kind of vibrant neighborhoods we want—but want to say that I would welcome these changes for my North Burns Park neighborhood.

That said, I do understand the motivations for the current approach. As I have previously indicated, I think it is much more important that duplexes, triplexes, and townhouses be *genuinely accommodated* than that apartments be technically allowed. If the zoning ultimately makes such development economically and practically feasible, that will be a significant advance for our city. The current proposal for the residential narrative includes important language in this respect, indicating that duplexes and triplexes be permitted “by right” and with dimensional standards that “accommodate them.”

My top priority for this section would be to strengthen and clarify this language. Specifically, that language is paired with instructions to consider a list of “form based regulations” and to include standards that encourage smaller homes “to support livability, scale, and compatibility within residential areas.” I am unsure exactly what this means, to be frank. One could imagine that this language is meant to guide the zoning to require minimal setbacks on small lots, in order to encourage denser and more walkable townhouse-style development (those being smaller homes, in one sense). Or, one could imagine that it really means “buildings shouldn’t look different than what’s already there now—it’s OK to squeeze two units into one structure, but not to do much more” (those being smaller homes, in a very different sense). If it means the latter, we know from ample experience (see, e.g., Minneapolis and many of the cities in Oregon after their statewide zoning liberalization) that this will be an empty gesture. That is not what the Planning Commission or Council intends (and would be a political cost for no policy benefit).

Thus, I encourage Planning Commission ensure that its “form & site considerations” for the “residential” category offer clear directions for the ultimate zoning decisions, and point in the direction of meaningful and feasible growth, not of undue deference to the existing built environment.

As part of this effort, the city should ensure that it works with architects, developers, and others to make sure it knows what standards are, in fact, necessary for meaningful redevelopment opportunities in Ann Arbor.¹ Based on experience in other places, I suspect that accommodating sustained, if gradual, redevelopment in these neighborhoods means accommodating larger units on smaller lots, in forms that can suited to ownership as well as rental (like Houston's [townhouses](#), Nashville's "[tall skinny](#)" homes, or [Bergen County, NJ's duplexes](#)). Similarly, I also assume, based on [results from Portland, Oregon](#), that infill, "missing middle" development will be more feasible if both freestanding and attached structures are permitted for any given amount of density. Spokane, Washington, has also seen successful infill development at the scale that the Comprehensive Plan seems to contemplate and could provide a model for Ann Arbor (although its efforts include up to six-unit apartment buildings). Such assumptions, however, should be checked against local market realities, not my or your best guesses.

"New Residential"

The August 12 memorandum proposes the creation of another category deemed "New Residential." I take no position on whether an intermediate category between "residential" and "transition" is necessary or whether the neighborhoods proposed for "New Residential" should be planned for that intermediate category. Rather, I would like to suggest that the thinking behind this category reveals a deeply misguided approach to comprehensive planning.

The "New Residential" category is, according to the memorandum, designed for places where more density ought to be permitted than in the "Residential" category. However, the "New Residential" category appears to be mapped almost exclusively on the perimeter of Ann Arbor. The reason for this seems to be that such areas are already built as townhouses or similar (e.g. Geddes Lake). Certainly, we should not be downzoning existing projects and creating non-conformities. But basing our planning categories primarily on existing uses is also a serious error, especially in a plan meant to guide growth for the long term.

Imagine, for a second, that we were writing on a blank page. We knew the location of downtown and the University; the highways, parks and other infrastructure; but somehow needed to build all our housing stock from scratch. It seems obvious that our proposed map would resemble something like concentric circles. The greatest density would be planned at the center (where demand is high and walkability at its peak) with a gradient extending outwards. There might be exceptions to this gradient (to facilitate the redevelopment of Briarwood, or limit growth on sensitive sites, or leverage opportunities around North Campus, say), but that would be the overall pattern. The proposed land use map follows this sensible approach in its Hub and Transition areas, but then *inverts* it for "Residential" and "New Residential." The only motivation I can discern for thinking that greater density should be allowed on the periphery than

¹ At this point in the process, it may be sufficient to commit in the Plan to such outreach, and not yet necessary to actually complete the task. But to the extent that the Plan includes specifics around design, such as height, it should ground these specifics in market conditions.

in the center is deference to the status quo. That's not good planning. Indeed, it's hard to call it "planning" at all: rather than setting an affirmative vision for the future and finding the best path towards that future, it merely codifies decisions from the past.²

If such development patterns are acceptable, or desirable, even off of corridors and nodes along Nixon Road or Huron Parkway, they should be acceptable or desirable closer in as well. Any other conclusion is essentially arbitrary, setting the future of our city based on what planning regime happened to be in effect for a parcel when its current land use was constructed.

The Planning Commission should feel free to accept the recommendation for "New Residential" in the areas where it is proposed. I see no harm in doing so. But it should think hard about what this recommendation means about the rest of the plan and whether this approach is the one it wishes to take.

Thank you for considering these comments.

Noah Kazis

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² Needless to say, we are not writing on a blank page, and rushing headlong as if we were was the source of some of planning's greatest mistakes. But from the perspective of fifty years from now, Ann Arborites will not care whether a given block was single-family residential in 2025, because it was originally developed as such in 1925. They will care if it serves the needs of 2075, whatever those may be. The thought experiment of starting fresh is a reminder that even if the change should be incremental, preserving neighborhoods' character—simply because it is the status quo—privileges the past without serving independent policy goals.