

FEEDBACK ON PARKING, TC1 CHANGES

I'm excited about future TC1 rezonings and downtown premium reforms. However, the fact is that most of the city, land-area-wise, continues to suburbanize in the meantime, developing in a way that's contrary to all of our equity, environmental, and public health and safety goals. More than 90% of non-UM land in the city will remain vulnerable to suburban development for years. It's death by a thousand cuts: parcel by parcel, once a property is lost to suburban development, it will remain that way for 40+ years, attracting car travel that injures and kills residents, generating carbon and particulate matter, and blocking the possibility of sustainable housing development both on the site and nearby (nobody wants to live near a massive parking lot with tons of traffic).

The planning commission can stop this trend immediately by cutting off the lifeblood of new, destructive suburban development: abundant car parking.

The federal and state governments are failing us when it comes to carbon control. This is why researchers have said that there is nothing more powerful that cities can do than improving what kind of development you allow to happen within the city limits.

Eliminating parking minimums is good, but it is not enough: virtually every development in the city has an excess of parking, including our own city's parking system.

Allowing more density is good, but it is not enough: shopping center developers over the past 10 years have chosen to keep building predictable suburban models of low density and plentiful parking (see: Arbor Hills shopping center).

Please urgently consider the following:

A citywide parking maximum

Excess parking simply has to be prohibited, and this will stop the worst suburban development. You have the tool to do it effectively, immediately, and with virtually zero effort with a citywide parking maximum.

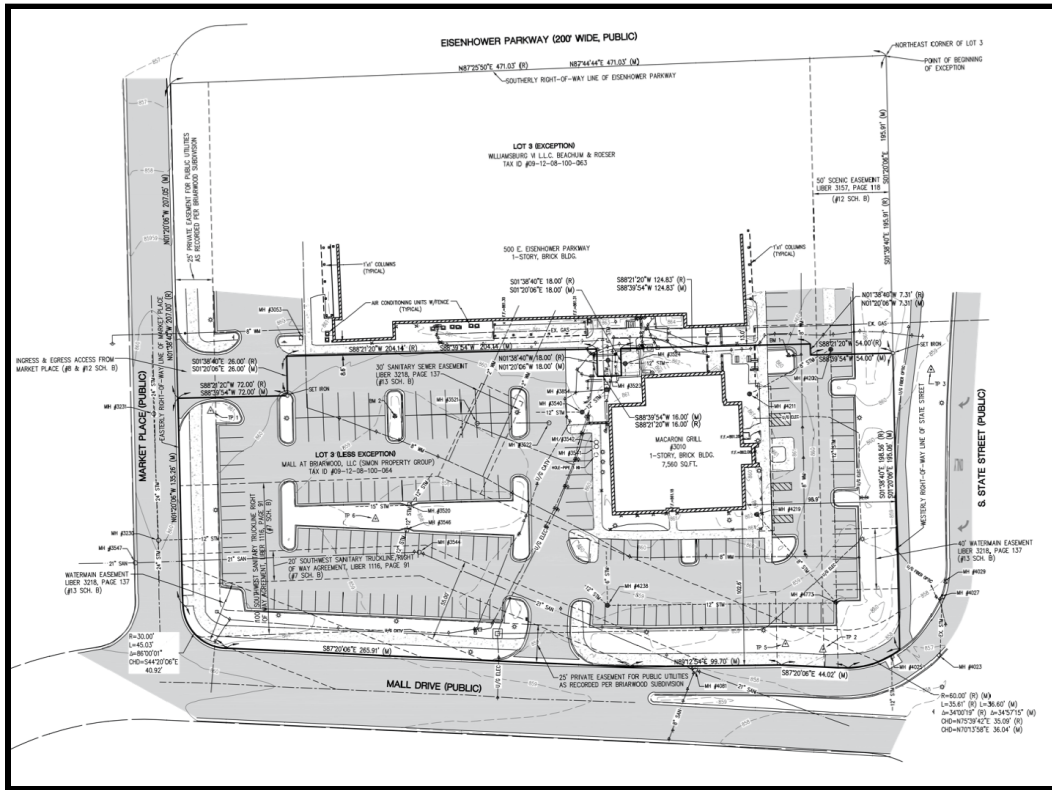
Implement a generous citywide, use-agnostic maximum as a stopgap measure based on either

- a) a traditional parking-space-per-interior-space ratio (eg, 1 space/250-333sf) or
- b) a vehicular-use-area-"footprint"-per-building-footprint ratio (eg, plan-view footprint of all vehicular use areas above ground cannot exceed 150% of building footprint)

The A2Zero Carbon Neutrality Plan recommends a "low parking maximum" for the entire city. A conservative starting point—one that would eliminate only the worst car-intensive offenders—could be achieved either through a traditional parking space ratio (as we have in most of our parking tables) or the "footprint" ratio of vehicular use area to building (a newer concept introduced by TC1 parking, except it should treat all above-ground parking from a footprint view regardless of the number of levels or underground parking). Either of these would be uncomplicated to add to our existing code.

As we can see from the recent dystopian examples of the Outback Steakhouse proposal on S. State St. (pictured below, with vehicle area exceeding building space by a factor of about seven) and the broker who is advertising a parcel *on the future Stadium transit corridor as appropriate for a car dealership*, we will keep moving further from

the community's vision for corridors and carbon control unless the planning commission takes action. The only way to protect the city in a simple way is to use parking maximums.



Outback Steakhouse proposal

Yes, the TC1 maximum will protect *some* portions of *some* corridors at *some* future date, but *all* corridors are vulnerable to car-oriented development in the meantime—as is the rest of the city. The Carbon Neutrality Plan tells us that adding car-intensive uses to the city, anywhere, is going in the wrong direction. We have set a goal of 50% reduction in VMT.

Conversely, by not implementing a citywide parking maximum—even a fairly generous one—it means that you want more oceans of parking surrounding Applebee's, car dealerships, gas stations, medical/dental offices, and banks to be built for many years to come.

Lower the TC1 maximum to 1 space/400-500sf

The 1 parking space/333sf of interior space is too car-intensive for TC1. This ratio, effectively an equal allowance between car storage and productive space, could be an appropriate maximum for the entire city. Please consider making the TC1 ratio 1 space/400 or 500sf. This would still allow most dwelling units to have a parking space. In mixed-use developments, retail could still have plentiful parking if the apartments were parked less. At the current 1 space/333sf, a 700sf apartment would be allowed to have 2 parking spaces. This is not transit-oriented.

Change the TC1 form-based parking table to allow properties to reach their maximum allowed parking spaces

In response to a question last year, I was informed that the TC1 form-based parking restriction (Table 5:16-2) limits the total area dedicated to vehicular use (parking, aisles, and driveways)—not its footprint—to 100 or 125% (depending on lot width) of the building footprint.

PARKING LOT	ALL BUILDINGS	<ol style="list-style-type: none"> 1. Located in side or rear yard only. 2. Vehicular use area may not exceed area of Buildings(s) footprint. 	<ol style="list-style-type: none"> 1. Located in side or rear yard only. 2. Vehicular use area may not exceed 125% of area of Building(s) footprint.
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I'm in favor of lower limits on parking, but this language effectively prohibits all parking structures, whether separate or integrated into the building, because the total parking area plus driveways will always exceed just the building footprint. It sounds like this was not the commission's intended outcome. This needs correcting and should be changed now or at the next meeting as it will preclude desirable TC1 projects from happening.

Consider changing the vehicular use area restriction to state: "The footprint of the above ground portion of the vehicular use area [surface and structured] may not exceed 125% of Building(s) footprint" and apply this to all lot widths (both columns).

Liberalize the TC1 purpose statement so that: 1) TC1 can replace ANY commercial- or mixed-use parcel, and 2) parcels proposed for rezoning don't need to be "completely surrounded" by commercial districts but rather just "adjacent" to them

Article II: Zoning Districts

5.13 Nonresidential and Special Purpose Zoning Districts | 5.13.1 R5 Hotel District

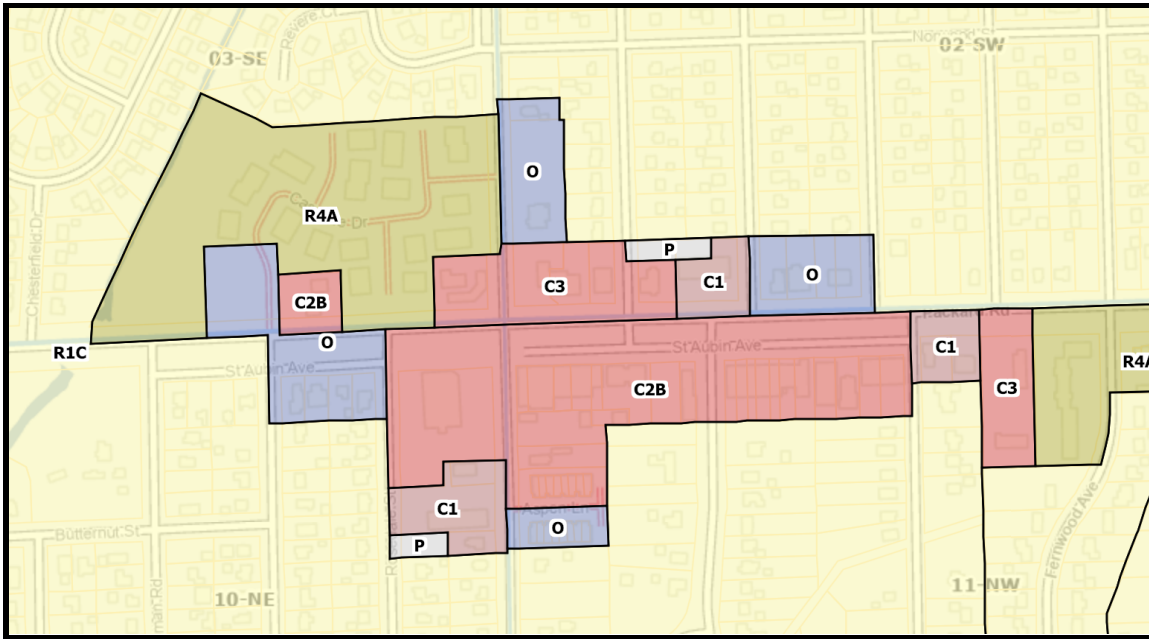
particularly the Sustainability Framework, the Land Use Element, the Climate Action Plan, and the Comprehensive Transportation Plan.

B. Specific Purpose Statements

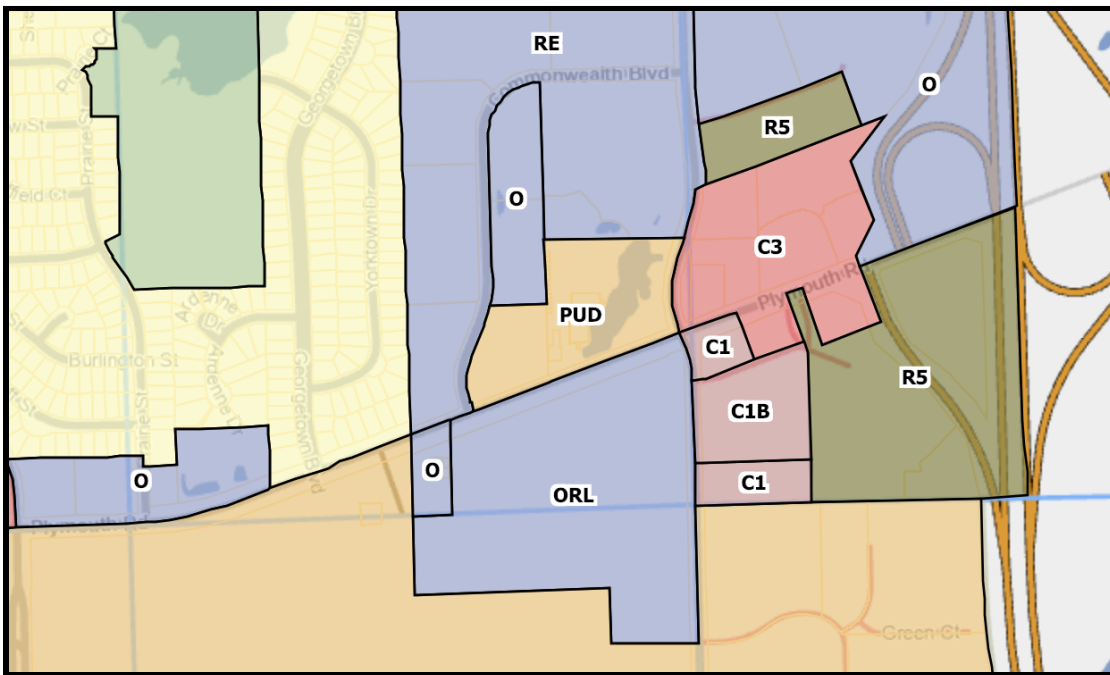
When approving a petition to rezone a site from its current designation to TC1, the Planning Commission and City Council should consider the following specific purpose statements:

1. This district may replace the O, RE, ORL, C2B, C3, P, R5 and M1 districts. It should only replace other zoning designations in unique and rare instances where another zoning district is entirely surrounded by the specifically mentioned districts.
2. This district should be located proximate to a transit corridor, meaning a street with existing fixed transit service. All areas of parcels zoned TC1 should be no more than ½ mile from a transit stop.

TC1 is a flexible district that self-limits building height relative to the proximity of detached residential. In general, I struggle to find a compelling reason why any commercially-zoned parcel shouldn't be eligible for TC1. For example, why shouldn't these C1 properties along Packard be eligible by default? (And, since they're not on the list of eligible districts, they are also disqualified from consideration because they are not "completely surrounded by" the listed types of parcels.)



In fact, some of the parcels on corridors that are slated for proactive rezoning (such as Stadium, Plymouth, and Washtenaw) do not even fit this criteria: they are neither in the list of eligible districts (because they are C1 or R4) nor are they “completely surrounded” by the eligible districts (because corridors are typically on the edges of detached-home areas). This fact will be used to fight TC1 rezonings because it’s not following its own rules.



Given the long time horizon and limited geographic length of city-initiated TC1 rezonings, I’m hoping you will be seeing petitioner-initiated proposals for rezonings. Requesting a rezoning is time-intensive and expensive on a good day, requiring lengthy notification processes as well as staff, commission, and city council vetting (and sometimes a super-majority of council). The current TC1 language is too restrictive and will prevent consideration of desirable projects that already have a difficult road to approval.