

Subject: Suggestion for Draft 3

From: Will Leaf
Sent: Friday, October 3, 2025 2:22 PM
To: Planning <Planning@a2gov.org>
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Hello Planning Commissioners,

The commission has done a heroic job improving the plan, and I think the final product is excellent. I have only one suggested tweak, concerning how the Hub district will be implemented.

https://docs.google.com/document/d/1SizYqoBFQIQfgSuWnULU-jB_DWd4APSwERj6tV_YzTY/edit?usp=sharing

Will

Summary

On page 155 of the plan, the "Zoning" column of the "Hub" row says "Amend D-1, D-2, and TC-1."

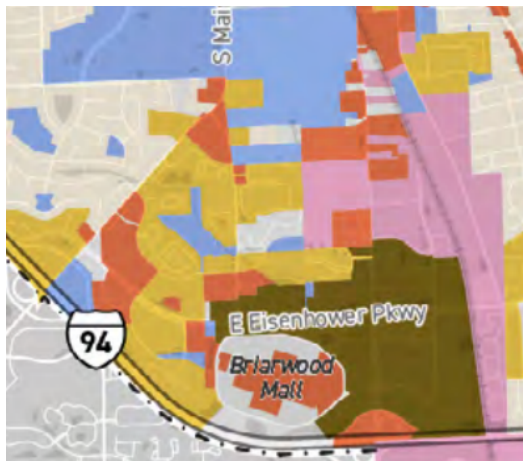
Zoning

Amend D-1, D-2, and TC-1

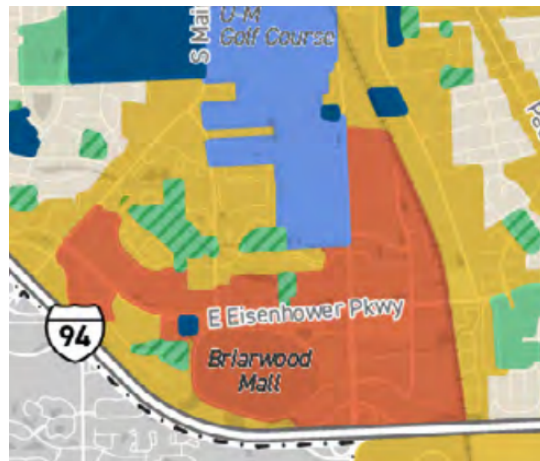
This recommendation is different than those of the other categories, which call for new zoning districts to replace old ones. I think creating a new Hub zoning district is going to be faster and better than amending and extending D1, D2, and TC1, so I suggest modifying that one box on the chart to read "Amend D-1, D-2, and TC-1, or create new mixed-use district(s)." This language will give the commission multiple options for implementing the Hub category.

Background

If you [compare](#) the future land use map with current zoning, you'll see that Hub covers areas that are not currently TC1, D1, or D2.



Current Zoning with TC1 in brown



Future Land Use map with Hub in red



Current Zoning with TC1 in brown



Future Land Use map with Hub in red

Hub	› C1	› D2	› PUD	› R5
	› C1A/R	› M1	› R1B	› RE
	› C1B	› M1A	› R2B	› TC1
	› C2B	› O	› R4B	
	› C3	› ORL	› R4C	
	› D1	› P	› R4D	

[Page 129](#) of the plan shows how many areas that are not TC1, D1, or D2, have been categorized as Hub.

Two Options for Implementing Hub

I see two ways to implement the Hub category:

1. Create new Hub zoning district(s) to replace D1, D2, and TC1.
2. Amend the D1, D2, and TC1 districts to be more flexible and then extend them to cover all Hub areas.

Advantages of Creating a New District

A New district would start from a clean baseline

It is better to start from the clean baseline of a new district and selectively add in regulations, rather than start from an old, complex baseline and remove regulations. The city is engaged in comprehensive reform, and it should not keep existing regulations simply because they already exist.

Extending TC1 will create mass non-conformities

The TC1 district is designed to only replace to a handful of non-residential zoning districts ([UDC, page 21](#)). TC1 also forbids one-story buildings and has [design rules](#) that would make most existing residential uses non-conforming. For example, TC1 requires that, except for townhouses, street-facing walls must be at least 15 feet tall and at least 60% transparent.

If no new Hub zoning district is created, TC1 would have to be extended to all Hub areas outside of downtown. These areas include apartment buildings, assisted living facilities, Briarwood Mall, and many other developments that will immediately become non-conforming if zoned TC1.



[Brookdale Senior Living](#), an assisted Living facility in a Hub category near Briarwood Mall. It would become a non-conforming use because it violates TC1's [two-story minimum height limit](#). Requiring assisted living facilities to be two-stories tall, with stairs and elevators, is not sensible.



[Clarendale Ann Arbor](#), a senior living community near Briarwood Mall in the Hub category. It would become a nonconforming use because it violates multiple TC1 requirements including its [20 foot front setback maximum](#) and street-facing wall transparency requirements.



[Cranbrook Tower Apartments](#), an affordable housing complex for low-income seniors in the Hub Category. These apartments would become non-conforming in the TC1 district. It's street-facing walls are not 15 feet tall or 60% transparent.

I did a quick search of non-downtown, non-TC1 developments categorized as Hub, and I was not able to find any developments that would conform to the TC1 district.

Extending the TC1 district to areas where none or almost none of the developments conform to the district would not be a wise policy. Instead, the city should plan to create a new Hub zoning district that is more flexible than TC1.

The Hub category is hard to reconcile with D1 and D2 districts.

The Hub category calls for context sensitive height limits adjacent to residential districts ([page 115](#)). If the downtown districts are amended to have context-sensitive height limits, rather than their current fixed limits, then the distinction between D1 and D2 will lose most of its meaning.

District names shouldn't be tied to specific places

The names Downtown Core, Downtown Interface, and Transit Corridor are tied to specific locations within the city, which limits their reuse in other places. It would be more flexible to treat each district's regulations as a separate concern from its location on the zoning map. Whatever district ends up covering downtown might also be a good fit in another part of the city.