

**Subject:** Hub Zoning

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**Sent:** Wednesday, April 29, 2026 8:16 PM  
**To:** Planning <Planning@a2gov.org>  
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**Subject:** Hub Zoning

Dear Ann Arbor Planning Commission:

I'll start off with a quick observation. TC1 is a very complex zone. D1 and D2 are comparatively simple zones. **Having fewer zones, but very complex zones does not simplify zoning, it simply moves where the complexity lies.**

The areas you have identified for hub districts from downtown to Briarwood to Arbor Land are vastly different and will have vastly different needs. Particularly since you are envisioning large, complex developments going into these zones. Trying to put these into a single zone will almost certainly result in massive non-conformities with the as-built environment.

Rather than try to hurriedly create one zone that tries to fit a large and diverse set of areas, uses, and built environments into a single, **I would recommend that each of the 9 Hub districts be put in its own separate zone.**

- Downtown is very different from the rest of the city and will need its own special considerations
- Some Hubs like the Maple Village, Arborland, and the western end of Eisenhower ought to be more oriented to the needs of shopping centers.
- The Briarwood Mall would ideally be planned and zoned for a mega mixed use development like Lincoln Square in Bellevue Washington.
- The triangle between Plymouth Road and Huron Parkway will need standards that accommodate its uses as an office park with large footprint buildings.

Failing to take the vastly different nature of these desperate places and their existing uses into account will likely have the effect of freezing their current forms and uses into non-conformity and be counter productive to any housing goals you may have.

- Having each hub as its own zone would allow each to evolve and be customized for its own development needs through simple text amendments *without affecting the development standards in a different hub district.*
- Some of the Hub Districts ought to be split into multiple zones. This is particularly true for H1 district where:
  - The 777 building area is an office parking lot infill focused on 5 over 1 development
  - The area inside the mall's ring road is a different opportunity where, if done right a true "second downtown" could be created. **In fact, I would strongly recommend using**

**Bellevue, WA's Lincoln Square as an aspirational goal for what Briarwood could be redeveloped into.**

- West Eisenhower, Maple Village, and Arbor will need zoning that accommodates the shopping centers that are there now. (You'll notice there has not been any TC1 projects in Arbor Land or Mapple Village, as they are likely frozen in non-conformity by TC1.)
- Some of the initial regulations for some of the zones may start off identical. The hub at the Upland on Plymouth (H-9) and the hub at the Stadium and Washtenaw split (H-8) come to mind. But these could evolve differently as experience and development needs arise.

**TC1 Was Written with State and Eisenhower in Mind**

It's not produced a lot of results elsewhere.

- **TC1's 300 foot build length rule is excellent for infill development like Arbor South** but doesn't make sense in downtown where there is a tight, predefined street grid or in an area like Traverwood where large footprint office buildings exist and would never conform to it.
- **TC1's Dynamic Height Stepbacks are Bad.** D1 and D2 explicit height's are a better model. *Stepbacks within a zone should be minimal.* You should be explicit in height allowances and use D1/D2 as a model of how to taper height.
  - **Woodbury Gardens is, I think, a good illustration.** They want to rezone the R4 sections of their property to build a series of 7 seven story "5 over 2s". Because it's an unusually large property they were able to come up with a way to make their rezoning request fit into TC1 zoning. However, the conditional rezoning they are proposing is functionally a new zone. To meet the setback needs of a seven story building, they have to include the R3 parcels of their property in the rezoning request, even though they have no plans to redevelop them and have offered to conditionally rezone them with a 35 foot height limit and limit them to the uses in the R3 district. Very complicated!
  - If however, there was a TC2 district with no or minimal stepbacks from residential districts and a uniform 85 foot height limit, then they could simply request those parcels be rezoned.

My suggestion to the Planning Commission as you work through the hub district would be to create a "menu" of forms and uses for the Hub district as a whole and mix and match them for each hub. Be mindful of the existing uses and platting of areas you're rezoning. Downtown is platted with a very tight street grid. The parking lot at the 777 building was not platted. These facts have big implications on development! It would be very difficult to get the zoning exactly right for any one of these Hub districts initially, but quite impossible to get it right for all of them. Having each in a separate zone means that the city will be able to back and make area specific tweaks to each individually without breaking something in a different hub area.

**In Summary**

Give yourselves *and future planning commissions* flexibility to easily tailor each of the Hubs to its own needs by putting them into separate zones. Be mindful of non-residential uses and needs of things like office parks and shopping centers. Keep the individual zones simple by having minimal stepbacks and uniform height and FAR rules within each zone.

Sincerely,  
Sam Homan