

We are writing this memo in response to the published [agenda](#) for Ann Arbor Comprehensive Plan Steering Committee Meeting #6. The agenda contains a draft future land use map that is more complicated than the [previous draft map](#) and poses questions for discussion. One question asks: Is there a need for an employment-only district?

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The “Employment Non Residential” District

We believe housing is compatible with the types of employment suggested for the new district, and there is therefore no need for an employment-only district.

The city has an extreme jobs-to-housing imbalance, with far more jobs than employed residents. Roughly 80,000 people commute to Ann Arbor every day. The imbalance drives up Ann Arbor housing prices and forces long commutes. City Council has made fixing the housing shortage a top priority, and it instructed the consultants to make a plan with five goals related to housing and sustainability. The goals are listed at the bottom of the [comprehensive plan resolution](#).

An employment-only district contradicts every one of these five goals. The district:

1. Contradicts the Carbon Neutrality Plan's goal of encouraging mixed-use neighborhoods and reducing vehicle trips.
2. Forbids building homes in large areas of the city rather than encouraging house building in already developed areas.
3. Increases the number of zoning districts and decreases their flexibility and adaptability.
4. Emphasizes use limitations by banning housing, rather than focusing on performance standards or the city's values.
5. Continues past land use policies that restrict housing construction, and therefore make Ann Arbor unaffordably expensive and exclusionary.

The motivation for an employment-only district may be to protect certain types of employment from competition with housing. We view this kind of competition as healthy and envision a future where the two not only coexist but are mutually beneficial.

As we explain below, allowing housing on North Main and South Industrial will almost certainly not drive out all the existing businesses, but will instead allow those areas to gradually evolve into denser, more walkable areas, with both more commercial space and more housing.

Counterarguments and Responses

a. Won't rezoning North Main and South Industrial drive out all the existing businesses?

Almost certainly not. There are large areas of the city that allow both housing and low-density commercial uses, and housing has not driven out the businesses there. The city has actually struggled to encourage housing construction along Stadium and Plymouth, where there are plenty of appliance stores and auto shops.



A tire store and oil shop on Stadium, where housing has been allowed for decades in the [C3](#) district, and now the TC-1.

Instead of driving out existing businesses, allowing housing near these businesses will support them by creating new customers, while providing badly needed housing.

For example, a developer is currently [planning](#) to build 164 units of affordable housing on a vacant lot on Stadium that used to be a Chrysler dealership. This development is not driving out any businesses, but is instead supporting nearby businesses. The city should strongly encourage this kind of development on North Main and South Industrial, not forbid it.



The vacant former Chrysler dealership that is being redeveloped into housing

b. Why is it important to allow housing on South Industrial and North Main, if housing is allowed in most other parts of the city?

Because these two areas are places where new housing is likely to actually be built. Both areas are full of [parking lots](#) that could be redeveloped.



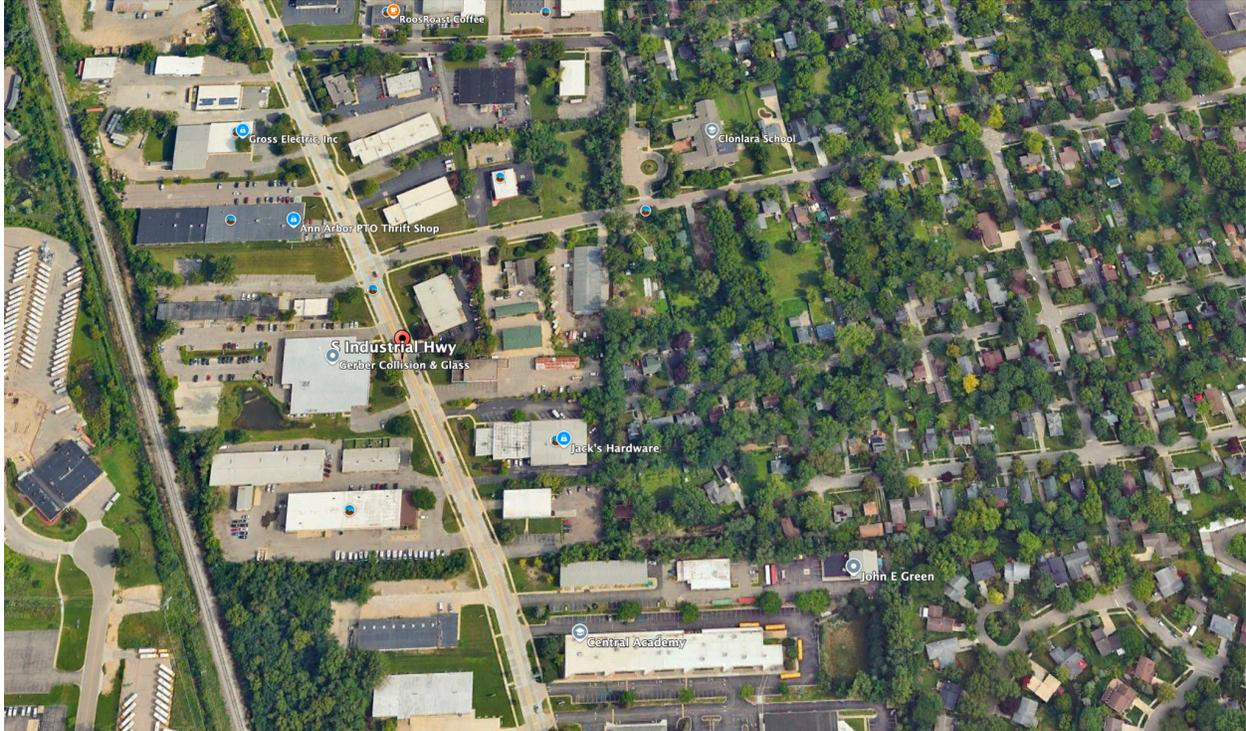
By contrast, many other parts of the city are unlikely to change in the near future, even if rezoned. For example, if a single-family neighborhood is rezoned to mixed use, it's unlikely that groups of neighboring homeowners will sell their houses to developers to build apartment buildings in the immediate future.

South Industrial is especially important, because the area is large. The city is already [planning](#) to build housing on South Industrial, and it should encourage developers to do the same.

c. Don't industrial uses need a special area where they can be messy and disruptive?

Some industrial activities are loud and dangerous – like smelting steel. The city bans dangerous activities throughout the city, and uses [strict performance standards](#) (p. 21) for harms like noise and glare.

Banning noxious industrial uses citywide is important, because our current light industrial districts are serving as low density mixed-use areas, with little to no industry. For example, on South Industrial, schools and shops intermingle while wholesale stores, all right next to a residential district.



While some industrial activities are loud and disruptive, other light industrial uses are benign and meet performance standards. It's our understanding that the new comprehensive plan will allow light industrial uses that meet performance standards in the Mixed-Use Hub and Mixed-Use Transition districts – as it should. Many other cities have mixed-use light industrial areas that allow housing. An example from Pittsburgh is shown below.



A RIV-IMU district in Pittsburgh that [allows](#) housing and light industry. [[street view](#), [zoning map](#)]

Because non-hazardous light industrial uses will be allowed in mixed-use districts, it is not necessary to create a special district for them. By rezoning North Main and South Industrial to Mixed-Use Hub or Transition, rather than Employment, these areas can gradually evolve into denser, more walkable versions of themselves, with more housing, commercial space, and light industrial uses.

Conclusion

We propose that an employment-only district would contradict the city's housing and sustainability goals specified in the resolution authorizing the contract the consultants are working under.