Subject: Improving the Wording on Historic Districts on P. 60 of the 3rd Draft of the CLUP
Attachments: White paper-Benefits of Historic Districts-10-4-25.pdf

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From: Jeff Crockett
Sent: Monday, October 6, 2025 11:02 AM
To: Planning <Planning@a2gov.org>; City Council <CityCouncil@a2gov.org>
Subject: Improving the Wording on Historic Districts on P. 60 of the 3rd Draft of the CLUP

The current wording for historic districts on p. 60 of the 3rd draft of the CLUP is the following:

"Historic district boundaries and development will continue to follow the standards and design guidelines established by the Historic District Commission. The city's fifteen historic districts are legally protected with the purpose to preserve the city's buildings and places of cultural and historical significance for future generations, an outcome from decades of legislative actions of the city. However, in the effort to protect, they also regulate new development in a manner that can be more limiting than underlying zoning regulations alone. As a result, while these neighborhoods are some of the city's most beloved, they are often limited in providing new housing units comparable to similarly zoned property elsewhere."

We would like to point out that the p.60 statement does not include recognition of the benefits of historic districts nor the evolving nature of historic significance in housing. For example, in the Minneapolis 2040 CLUP, note the inclusion of the following:

"It's critical for public engagement to include all interested groups in the preservation process, especially those whose history has been marginalized and whose places suffered deliberate disinvestment and removal. Minneapolis will work to ensure that residents of all cultures and backgrounds will have access to preservation resources while experiencing the economic, sociocultural, and emotional benefits of preservation. ... The City will use the feedback from this engagement to help identify and preserve buildings, landscapes, and other places important to the city's heritage. Additionally, the City will recognize and actively promote the intrinsic value of historic places as integral to the city's evolving environment."

The Minneapolis statement shows that historic preservation is not a static consideration and should be an ongoing conversation in the community. One negative side-effect of increased density is gentrification, mostly in areas where the housing is moderately priced. Purchasing and demolishing homes in these areas will displace people, and result in higher housing costs as they move elsewhere. The higher property taxes that result from upzoning can displace those on fixed incomes. How can we minimize gentrification if we upzone single-family neighborhoods? This should involve an ongoing city-wide conversation that is suggested in the Minneapolis plan. In Ann Arbor, homes in the once-historically black neighborhoods on N. Fourth and N. Fifth, north of E. Kingsley, are particularly at risk due to the projected Transition districting in this area. One way to protect these homes would be to create a historic district for this area. But, clearly, we should be documenting the history of these homes before they are demolished as a result of upzoning. There is no simple solution to gentrification. But, this likely result of upzoning needs to be acknowledged in our CLUP along with a recommendation for ongoing citizen engagement about protecting historic homes in these communities.

For an in-depth analysis of the benefits of historic preservation, we highly recommend the attached analysis written by Susan Kaufmann and Dan Rubenstein.

Thanks for your consideration,

Jeff and Christine Crockett

The Benefits of Historic Preservation
Susan Kaufmann and Dan Rubenstein
Prepared for the Ann Arbor Preservation Alliance
October 4, 2025

In "Twenty-Four Reasons Why Historic Preservation is Good for your Community," PlaceEconomics draws on their numerous citywide studies of the economic benefits flowing from historic preservation. Some of those benefits are:

- Older neighborhoods can be more affordable. "**Keeping older housing maintained and occupied, both in historic districts and elsewhere, needs to be a central strategy for housing affordability. The chances of a dwelling unit being razed and replaced by a more affordable unit is virtually non-existent** (p. 22)."
- Historic neighborhoods provide economic diversity at the neighborhood level.
- Historic districts are more densely populated than other single-family neighborhoods and have a greater variety of housing types, including rentals. They were designed from the beginning for mixed uses, including commercial properties. "**They provide density at a human scale** (p. 15)."
- Historic neighborhoods align with the Smart Growth movement for sustainable communities. "In fact, **if a community did nothing but protect its historic neighborhoods, it will have advanced a comprehensive sustainable development agenda** (p. 18)."
- They are environmentally responsible. Rehabilitating older properties preserves building materials and embodied energy, keeping materials out of the landfill.
- Millennials, now the country's largest age cohort, are attracted to historic neighborhoods, in part because they are suited to walking and biking.
- Rehabilitation and maintenance of historic properties generate employment, and businesses, particularly small or young ones, are attracted to historic neighborhoods, as is the creative sector.
- Tourists are drawn to restaurants, arts, local shops, sense of place and cultural events in historic downtowns and neighborhoods.
- Historic districts are not frozen in time. They change through rehabilitation of existing structures, adaptive reuse, replacement of nonconforming properties, infill and ADUs.

> "**Historic district[s] … regulate new development in a manner that can be more limiting than underlying zoning regulations alone.** As a result, while these neighborhoods are some of the city's most beloved, they are often limited in providing **new housing units** comparable to similarly zoned property elsewhere."

This grudging posture toward historic districts focuses entirely on construction of new housing units, disregards the already greater density of historic districts, does not seek to understand why historic neighborhoods are beloved or to capitalize on those characteristics, and contains an implicit wish for historic district status to be revoked so denser underlying zoning can apply. It is seriously out of step with what we know about historic districts and how other cities value historic preservation.

Peer cities are centering historic districts in their land use plans, recognizing that they give cities not only significant economic benefits but also a sense of place and unique identity. Grand Rapids, Kalamazoo, Madison, Portland, Boulder and Minneapolis embrace historic districts as well as historic properties and neighborhoods.

Kalamazoo's master plan highlights its historic neighborhoods and properties, stating: **"These protected areas have preserved Kalamazoo's character and heritage and … continue to tell Kalamazoo's story."** Boulder County, Colorado maintains a historic sites survey, adding properties as they become 50 years old. There is a chapter on Cultural Resources in The Boulder County Comprehensive Plan. It stipulates that "**when Boulder County's zoning regulations are not consistent with the historical pattern of development, the county shall recognize the importance of the historical pattern by implementing zoning amendments (CR 1.03.04)**."

Portland, Oregon devotes significant attention to historic preservation in its Comprehensive Plan. Policies include encouraging rehabilitation … **aligning zoning and historic districts**, preventing demolition, maintaining an historic district inventory, incorporating under-served or under-represented people, preserving diverse cultures, and more (p. GP4-13-14).

The "GROW Grand Rapids 2040 Comprehensive Plan" stipulates that city policies should **"Promote the development, rehabilitation, and retention of neighborhoods and their existing character within urbanized areas. … Core neighborhoods contain a variety of traditional architectural styles and naturally-occurring affordable housing. A focus on retention and enhancement of core neighborhoods helps preserve the City's cultural identity and strengthens community (**Chapter 4, p. 4-23)**."**

Some cities are using historic preservation as a tool to redress historic injustice. For example, the "Minneapolis 2040" land use plan, which density advocates uphold as a model, stipulates that "**It's critical for public engagement to include all interested groups in the preservation process, especially those whose history has been marginalized and whose places suffered deliberate disinvestment and removal. Minneapolis will work to ensure that residents of all cultures and backgrounds will have access to preservation resources while experiencing the economic, sociocultural, and emotional benefits of preservation. … The City will use the feedback from this engagement to help identify and preserve buildings, landscapes and other places important to the city's heritage. Additionally, the City will recognize and actively promote the intrinsic value of historic places as integral to the city's evolving environment (**Goal 7, Policies 60, 91, 92, 93)**."**

Madison, Wisconsin created both the Madison Comprehensive Plan and the Madison Historic Preservation Plan as well as a Racial Equity and Social Justice Initiative. The Comprehensive Plan stipulates that **"Madison will need to balance encouraging redevelopment and infill with protecting the qualities that made existing neighborhoods appealing to begin with."** (p. 76). Importantly, "A valuable lesson learned over the decades is that **the city is stronger, and the results are better, when a diversity of residents are informed, involved, consulted, and in partnerships in all aspects of city decision-making** (p. 110)."

The Ann Arbor Comprehensive Land Use Plan is out of alignment with planning best practices, the state of knowledge about historic preservation, and peer cities. Our planning process and document will benefit from a strong focus on the contributions of historic districts, neighborhoods and properties to the economic, cultural and social strength of our community.