Subject:

Chapter 5 Suggestions

From: Will Leaf

Sent: Saturday, July 12, 2025 11:10 PM
To: Planning <Planning@a2gov.org>
Subject: Chapter 5 Suggestions

Hello commissioners,

Thank you for your continued great work. Below are some suggestions for finishing up Chapter 5 of the Comprehensive Plan.

Suggestions

https://docs.google.com/document/d/1vKC6lamTYH_p0ylsb1ir8VCvruJEYCo3GM2N7H8e4c/edit?usp=sharing

Here is a separate memo on the R1 areas included in Transition.

R1 Areas in Transition

https://docs.google.com/document/d/1uL1xZK0yZe7noFb--cstS6F_wZ5HDsJyF1CyBWhp_0/edit?usp=sharing

Summary

Most Important Suggestion

 Avoid accidentally downzoning South University. https://docs.google.com/document/d/13b089OzElgbcKKKB7Mkp8zywd7q_Tf3bqAMWq Kttysl/edit?usp=sharing

Other Suggestions

- 1. Make it clear that noxious heavy industrial uses will not be allowed in Transition.
- 2. Put all R4/R3 in the Transition Category
- 3. Make it clear that highrises in Transition will be allowed "far from Residential" rather than only "near hub," so that highrises are not forbidden near Central Campus.
- 4. Remove the "Prefer active first floor uses" lines from Transition and Hub.
- 5. Remove the line saying existing historic district standards will be maintained.

Details

Make it clear that noxious heavy industrial uses will not be allowed in Transition

On page 114, The Hub category permits "light industrial" uses, while Transition permits "Industrial" uses without qualifiers. The most straightforward interpretation of this difference is that the Transition district will allow both light and heavy industrial uses.

- > Residential
- > Commercial
- > Office
- > Industrial
- ➤ Prefer active first floor on arterials
- > Residential
- > Commercial
- > Light Industrial
- > Office
- Prefer active first floor commercial, particularly at nodes

Transition

Hub

This change is surprising, because in the first draft of the comprehensive plan, the Flex district did not allow heavy industrial uses. <u>Page 102</u> of the first draft lists the following permitted uses under Flex:

- Office, Commercial, R&D, light industrial
- Residential when infrastructure allows

It would not be wise to allow heavy industrial uses in Transition areas. There are currently only two heavy industrial districts in Ann Arbor:

- 1. A tiny patch at Hoover and Greene that is owned by U of M and DTE.
- 2. Part of the North Main corridor.



Hoover and Greene

North Main

There does not seem to be a universally accepted distinction between "heavy" and "light" industrial uses, but a key difference is that "heavy" industrial uses have more intense emissions and impacts on the land uses around them. The North Main heavy industrial district immediately abuts houses, Argo Docks, and other sensitive land uses, so the city should not plan to allow new heavy industrial uses in this area. To my knowledge, there are no noxious industries on North Main currently, so prohibiting new heavy industrial uses there would not be a big change. The Gypsum Supply company on North Main is already in a light industrial district.

Instead, the city should rezone North Main to allow light industrial, residential, and commercial uses. Many cities have mixed-use light industrial districts.

Of course, the Transition districts covers far more areas than just North Main. It would be unwise to plan to allow heavy-industrial uses in all these other areas, because heavy industrial uses would, by definition, have heavy impacts on neighboring land uses.

I agree with commissioner Norton about removing the line on page 79 that says, "nuisance regulations should be reviewed to minimize complaints while prioritizing flexibility." The plan should prioritize the health and safety of Ann Arbor residents, not minimizing complaints.

Put all R4/R3 in the Transition Category

On this issue, the main question the planning commission needs to answer is:

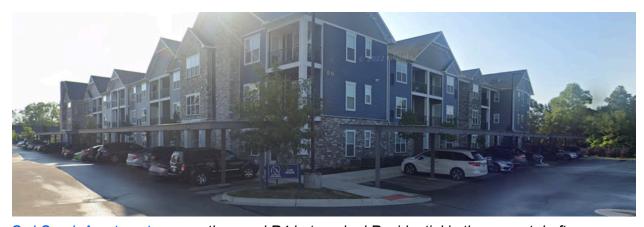
"If a condominium or apartment complex wants to redevelop at a higher density, should the city limit the redevelopment to three stories with only a narrow range of neighborhood businesses permitted?"

If the answer is no, the commission should mark the R3/R4 properties Transition. Figuring out the exact height limit formula for the Transition district is beyond the scope of this plan.

It would be good to put R3/R4 properties in Transition for two main reasons:

Housing

Woodbury Gardens on South Industrial is currently <u>trying to add about 300 units</u> to their apartment complex. The city should make this kind of redevelopment easy. For example, if Owl Creek Apartments off Nixon Rd wanted to add more housing, the city should encourage them to do so.



Owl Creek Apartments, currently zoned R4 but marked Residential in the current draft.

Commercial

At the last meeting, it seemed that the commission's main reservation in zoning R3/R4 parcels Transition was that high density housing might increase traffic on peripheral arterial streets.

Concerns about traffic make it even more important to zone these parcels Transition, so that residents have more nearby commercial destinations to walk, drive, or bike to. Residents should have access to a broader range of commercial and light industrial services than just the neighborhood stores that will (hopefully) be allowed in Residential districts.

Allowing mixed-use commercial shopping centers in these areas would probably be more politically popular with neighbors than allowing dense 3-story housing with limited commercial.

The Bus Route Counterargument

A counterargument is that the city should limit development to areas that have good bus service. This argument is not sound, because the city badly needs more housing, and bus routes can be reconfigured if there are large population increases in areas without bus service. Such a reconfiguration would be a boon for other residents, as they would benefit from the transit service made viable by the new high-density housing.

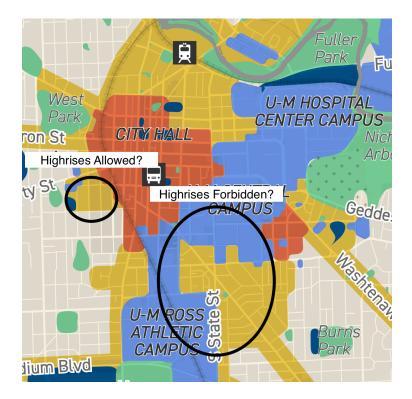
The city's bus system exists to serve residents—residents don't exist to serve the city's bus system. If we forbid high density housing in areas without existing good bus service, and we only expand service to areas with high density housing, we will have a chicken and egg problem and our housing options and bus service will be artificially limited.

Make it clear that highrises in Transition will be allowed "far from Residential" rather than only "near Hub," so that highrises are not forbidden near Central Campus.

On page 115, The transition height rules suggest that high-rises will only be allowed near Hub districts.

- ➤ Low- to high-rise buildings (high-rise if adjacent to Hub)
- Context-sensitive height (lower/smaller adjacent to Residential and taller more intense near Hubs)

This principle would limit high-rises next to Central Campus where they are most needed. It would also create the unintended outcome of allowing highrises in transition areas that are close to Hub but also immediately next to Residential areas.



To avoid this unintended outcome, the bullets above can be rewritten to say:

- 1. "Low- to high-rise buildings (high-rise when far from Residential districts)"
- 2. "Context-sensitive height (lower/smaller adjacent to Residential)"

You could also just delete bullet point 1, since it is redundant with point 2.

Remove the "Prefer active first floor uses" lines from Transition and Hub.

Page 115 contains the following three bullet points under "Preferred Building Form" and "Building Uses":

 Prefer active first floor on arterials

> Prefer active first floor uses

➤ Prefer active first floor commercial, particularly at nodes

It is unclear what "prefer" means, but the most straightforward interpretation of these bullets is that they call for ground-floor retail and transparency requirements. These requirements would forbid or restrict many critical uses in both Hub and Transition, like day cares, urgent cares, Planned Parenthoods, nursing homes, schools, and ground-floor residential in multifamily buildings. They would also make hundreds of single-family homes on arterial streets non-conforming uses.

I suggest removing the three bullets.



An urgent care on Stadium that would become a nonconforming use in the Hub district.



Homes in a Transition District on an arterial (Packard) that would become non-conforming uses.

Remove the line saying existing historic district standards will be maintained.

Page 60 states:

Historic district boundaries will be maintained, and development will continue to adhere to the existing standards and design guidelines approved by the Historic District Commission.

It would be excessively conservative to maintain the existing historical district standards indefinitely without changes.

Instead, the commission should suggest revising historical district standards to allow for energy efficiency improvements. Currently homeowners in historic districts are <u>not allowed</u> to replace their doors or windows even if they are single-paned and covered in lead paint.

The city should plan to change these rules. Jonathan Levine and I suggested the following revision in our last memo:

Historic district standards and design guidelines should be reviewed in light of the city's Carbon Neutrality Plan and sustainability goals. Rules prohibiting double-paned windows and energy-efficient doors should be reconsidered.

If you don't feel comfortable planning for changes, please do not simply endorse the existing standards, since the commission has not spent any time whatsoever reviewing them during this comprehensive plan process.

Summary

The current draft of the comprehensive plan classifies some R1 parcels as Transition. These parcels fit into three main categories:

1. Isolated parcels surrounded by other zones.

It's important to keep these parcels in Transition, so that nearby height limits are not restricted by isolated residential parcels that are not currently separated from other land uses.

2. Parcels along arterial roads.

I favor keeping these parcels in Transition, but I don't think doing so is very important. If you find that these parcels are jeopardizing the plan politically, I suggest removing them.

3. The Upland Drive neighborhood

I think it is probably unwise to put the Upland Drive neighborhood in Transition, as doing so would allow highrises in a currently single-family neighborhood. This allowance would be inconsistent with the rest of the plan and could fuel the backlash against it.

Details

Isolated parcels surrounded by other zones.

Transition contains a few one-off parcels of R1. It is important to keep these parcels in Transition, so that the context-based height limits in Transition and Hub are not limited by single parcels that have never been separated from other land uses anyway.



An isolated R1 parcel on North Main

For example, I don't think it would be reasonable to limit building height limits on all of North Main so that the single R1 parcel above is protected from tall buildings hundreds of feet away.

Parcels along Arterial roads.



R1 on W. Stadium



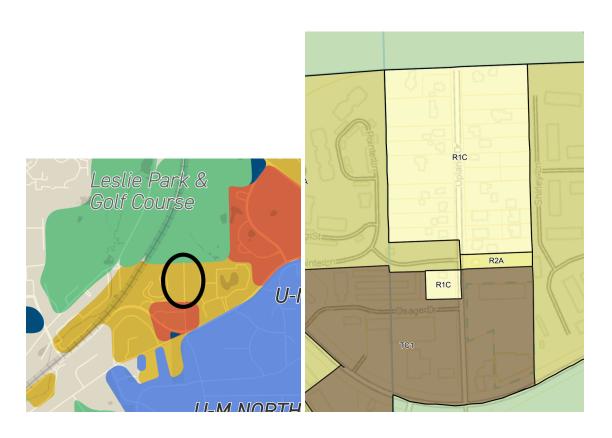
R1 on Washtenaw

I don't think these inclusions will end up being very important, because the buffering rules for Transition will limit the heights in these areas to a level similar to the immediately adjacent residential districts.

The main effect of marking these areas Transition would be to allow a wider variety of businesses than those allowed in the Residential category. I see this flexibility as a good thing, so long as the city enforces performance and nuisance standards, but I don't expect many developers will be eager to buy expensive single-family houses and tear them down to build light-industrial facilities. I think the end result will be similar if the city marks these R1 parcels as Residential.

However, these inclusions are going to be very controversial, and I expect many homeowners who see that their home is in or near a Transition district are feeling singled out and angry. If you find that putting these parcels in Transition is jeopardizing the plan politically, I don't think you should insist on keeping them in Transition.

The Upland Drive neighborhood





Upland Drive, included in the Transition District

As far as I can tell, Upland Drive is the only place where an entire R1 neighborhood has been placed in the Transition category. There are no Residential parcels nearby, so this Transition district would allow either highrise or midrise apartment buildings, depending on how the Transition category is implemented.

I would guess staff or the consultants marked this area as Transition because most of the land around it is multi-family residential. Marking this area as Residential would limit building heights near North Campus where housing is badly needed.

On the other hand, allowing high-rises in a currently single-family neighborhood could be extremely controversial. I can imagine an Mlive article with photos of the neighborhood titled something like "Highrises Here?" I also think its inclusion in Transition could pressure City Council to limit building heights in Transition, which could greatly reduce the supply of housing city-wide.

I think it's probably best to mark Upland Drive Residential. A compromise option could be to mark Upland Drive as Residential, but recategorize the surround areas as Hub to allow mid-rise buildings immediately adjacent to Upland Drive, but not on Upland Drive.