

**Subject:**

Ann Arbor Comprehensive Plan Feedback - Pause the Plan

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**From:** Jim Lewis**Sent:** Thursday, June 26, 2025 8:00 AM**To:** City Council <CityCouncil@a2gov.org>; Planning <Planning@a2gov.org>**Cc:** senjirwin@senate.michigan.gov; sensshink@senate.michigan.gov; JasonMorgan@house.mi.gov; MorganForeman@house.mi.gov; CarrieRheingans@house.mi.gov; JenniferConlin@house.mi.gov; sandersc@washtenaw.org; labarrea@washtenaw.org; rabhiy@washtenaw.org; scottk@washtenaw.org**Subject:** Ann Arbor Comprehensive Plan Feedback - Pause the Plan

Dear Members of the City Planning Commission and City Council,

I am writing to respectfully request a pause in the adoption of the Draft Comprehensive Land Use Plan (CLUP) to allow for a more thorough evaluation and community engagement process. While the intention to address housing affordability and sustainability is commendable, several aspects of the current draft raise concerns that warrant reconsideration.

### **Data Accuracy and Transparency**

The CLUP relies on outdated housing vacancy data from 2022, citing owner vacancy at 1.1% and renter vacancy at 3.1%. However, more recent data from May 2025 indicates a rental vacancy rate of 6.9%, which falls within the 5-8% range considered indicative of a healthy housing market. Utilizing outdated figures may lead to misguided policy decisions that do not reflect current market conditions.

### **Parkland Reclassification Concerns**

The draft plan omits 484 acres of public parkland, including Leslie Park and Huron Hills golf courses, from its inventory. This reclassification reduces the reported parkland per 1,000 residents from 17.96 to 13.9 acres, potentially paving the way for development on these green spaces. Such changes could undermine the city's commitment to preserving natural areas and providing recreational spaces for residents.

### **Infrastructure and Environmental Considerations**

The proposed increase in housing density may strain existing infrastructure, particularly water and wastewater systems. The city's 2024 Water Facility Plan, based on Southeast Michigan Council of Governments (SEMCOG) projections, indicated that current facilities are sufficient for a 50-year horizon. However, the CLUP's higher population projections could necessitate significant infrastructure investments, leading to increased costs for residents.

### **Community Engagement and Representation**

The planning process has seen limited public participation, with only 2% of residents responding to surveys that were not designed to be statistically representative. This raises concerns about the

inclusivity and comprehensiveness of community input, especially from underrepresented groups such as low-income residents and newer community members.

## **Strategic Density Implementation**

While increasing housing density is a valid strategy to address affordability, it is crucial to implement it thoughtfully. Focusing higher-density developments along main corridors and transit zones can promote sustainability and accessibility without compromising the character of established neighborhoods. This approach aligns with the city's goals of reducing car dependency and preserving community integrity.

### **Historic Districts Must Be Preserved**

Ann Arbor's historic districts are invaluable assets that contribute to the city's unique character, architectural diversity, tourism economy, and cultural heritage. They support walkability, attract long-term residents, and increase property values citywide by preserving quality and aesthetic appeal. Studies show historic preservation contributes to economic development through job creation, enhanced property stability, and neighborhood revitalization without gentrification-induced displacement.

Blanket rezoning that ignores these districts threatens to erode these benefits and risks irreversible damage to the city's architectural legacy. The plan should affirmatively protect these districts and exempt them from density upzoning, ensuring new growth does not come at the cost of Ann Arbor's identity.

### **Property Tax Equity Must Be Addressed First**

Ann Arbor has a deeply inequitable property tax system rooted in Michigan's Proposal A. Long-time homeowners with similar homes can pay drastically less in taxes than recent buyers, regardless of income. This tax lock-in effect discourages housing mobility, exacerbates inequities, and burdens new residents disproportionately.

Before adding density that increases infrastructure demand and municipal costs, the city should pursue state-level advocacy or local measures to address this inequity. Adding dense development while relying on this regressive tax base only deepens the affordability crisis for those who can least afford it.

### **Recommendations**

- **Pause the adoption** of the CLUP until accurate data, equity analyses, and stronger community engagement can inform revisions.
- **Preserve historic districts** through explicit protections and exemption from density upzoning.
- **Reaffirm parkland protections** and reinstate omitted acreage in official documentation.
- **Address tax inequities** before expanding development that could strain services.
- **Encourage density on main corridors**, not in stable, character-rich neighborhoods.
- **Require affordability assurances** tied to any upzoning or increased entitlements.

By taking these steps, the city can develop a more balanced and community-supported plan that addresses housing needs while preserving the unique character and environmental assets of Ann Arbor.

Thank you for considering these concerns.

Sincerely,

Jim Lewis