



HERITAGE HILL ASSOCIATION  
126 COLLEGE AVE SE  
GRAND RAPIDS, MICHIGAN 49503  
(616) 459-8950 FAX (616) 459-2409

January 17, 2018

Grand Rapids Planning Commission  
Grand Rapids Planning Department  
1120 Monroe NW  
Grand Rapids, Michigan 49503

RE: Proposals for Zoning Ordinance Changes re Affordable Housing

Dear Members of the Grand Rapids Planning Commission,

The Heritage Hill Association strongly supports the overall goal to increase the number of affordable dwelling units for the City's residents but we cannot support the proposed Zoning Ordinance changes. We question that the changes to the Zoning Ordinance would increase the number of affordable housing units and further believe that these proposals would increase other problems in neighborhoods.

Because Heritage Hill has the highest concentration of rental housing in the City, over twice the Grand Rapids average, a policy in the Association's *Master Plan of Heritage Hill* is to "rigorously scrutinize any requests to increase density in existing residences." The Master Plan was recognized by the Grand Rapids Planning Commission in 1988 "as a reference guide for decisions which affect the future of the neighborhood" and was updated in 2005.

Density of housing units does not equate to affordable housing. If that were so, rents in Heritage Hill would be lower. It is demand that drives rents and higher demand areas of the city will command higher rents. 80% of the 3,500 Heritage Hill households are tenants and rents continue to rise. Adding more units by right will just add more market rate apartments. Market rate currently stands at \$1,200 for a one-bedroom apartment.

The Association offers the following comments for the Planning Commission's consideration:

### **Recommendation #3: Incentives for Small Scale Development**

1. We oppose allowing proposals for 2-units by right on corner parcels and 2 to 4 units within 100 linear feet of commercial areas. While there could be instances where increased density would work in the cited areas, neighbors have the right to comment. Not every corner or corridor property is appropriate and neighbors bring that insight to the decision making body.
2. The recommendation will increase density, but will likely not result in affordable housing. The cost of construction and market rate will set the cost of the apartment.
3. While limited in Grand Rapids historic districts, what will prevent an investor from buying entire blocks adjacent to commercial zones, demolishing the existing housing, and constructing a series of 4-unit structures. New construction is rarely affordable.
4. The Proposed Design Guidelines Manual should be developed before any action proceeds on this recommendation, with input from independent architects experienced in urban planning and neighborhood representations.

### **Recommendation #8: Allow Accessory Dwelling Units (ADU) by Right**

1. The proposal would allow an ADU to be built in conjunction with a principal residence (owner-occupied). Since the unit would have a kitchen, a bathroom and a separate entrance, we are concerned that these eventually could be converted to a rental two-family at a later date. Specifically, how will the owner-occupancy requirement be enforced over time?
2. If the purpose of this change is to increase affordability of home ownership by allowing rental income, the cost of constructing an ADU can be daunting. A non-profit developer stated that adding an ADU over an existing garage could cost at least \$50,000.
3. Rather than making ADU a right, we suggest that the application fees be waived to applicants meeting income guidelines. This would make the “ask” affordable but would not take away neighbors’ ability to comment on the appropriateness.
4. An ADU should be registered and periodically certified in a manner similar to rental dwellings. Enforcement of the Zoning Ordinance is a major concern among many neighborhoods and any changes like this must be accompanied by a commitment by the City to increased funding and staffing for enforcement.
5. Two parking spaces are required for a single family dwelling, while 1 space is required for an ADU (3 total). HHA would support a restriction that the parking requirement cannot be waived.

### **Recommendation #6: Density Bonus**

Although this is unlikely in historically designated neighborhoods, what is to prevent investors from buying existing adjacent single family dwellings, demolishing them and building a multi-unit development that qualifies for the density bonus?

### **Recommendation #9: Non-Condo Zero Lot Line Units (Attached single-Family Residential)**

In general, recommendation #9 is supportable if there is public review.

We believe incentives, rather than most of these Zoning Ordinance changes, are likely to be more effective in developing affordable housing. A non-profit tried to find examples/studies that show how zoning changes historically/nationally affected the affordability of housing units, but has not found any. The Association must conclude that changes in the zoning ordinance will not necessarily result in affordable housing.

On behalf of the HHA Board, we thank you for the opportunity to comment and consider our comments.

Sincerely,



Lisa Baars and Wesley Beck

Co-Presidents, Heritage Hill Association Board of Directors