PLANNING AND DEVELOPMENT SERVICES STAFF REPORT
For Planning Commission Meeting of August 6, 2014

SUBJECT: Ann Arbor Housing Commission Platt Road East Rezoning and Site Plan for City Council Approval
3451 Platt Road
Project Nos. Z14-003 and SP14-009

PROPOSED CITY PLANNING COMMISSION MOTION

The Ann Arbor City Planning Commission hereby recommends that the Mayor and City Council approve the Ann Arbor Housing Commission Platt Road East Rezoning from R1C Single-Family Dwelling District and R2A Two-Family Dwelling District to R4B Multiple Family Dwelling District.

PROPOSED CITY PLANNING COMMISSION MOTION

The Ann Arbor City Planning Commission hereby recommends that the Mayor and City Council approve the Ann Arbor Housing Commission Platt Road East Site Plan, subject to preliminary approval from the Washtenaw County Water Resources Commissioner.

STAFF RECOMMENDATION

Staff recommends that the rezoning petition be approved because the proposed zoning classification is consistent with the housing goals of the Sustainability Framework and Land Use Element, is generally consistent with the future land use recommendation in the Land Use Element for the site and vicinity, and is compatible with the surrounding area.

Staff recommends that the site plan be postponed to allow staff to complete their reviews of the site plan as well as allow the petitioner to respond to staff concerns regarding natural features impacts.

LOCATION

This site is located on the east side of Platt Road between Redwood Avenue and Lorraine Street, across from Sharon Drive and Verle Avenue (Southeast Area, Swift Run watershed).

DESCRIPTION OF PETITION

The Ann Arbor Housing Commission is seeking approval to rezone a 3.1-acre site from R1C (Single-Family Dwelling) and R2A (Two-Family Dwelling) to R4B (Multiple-Family Dwelling), demolish all existing dwelling units, including 4 single-family homes and one two-family building, and construct a 32-unit apartment complex with five buildings, 61 vehicle parking spaces, a playground, and a community building.
The site includes the current Platt Road East community of the Ann Arbor Housing Commission, as well as an adjacent parcel to the north, which is in the process of being purchased by the City on behalf of the Housing Commission.

Rezoning – A petition to rezone the subject site from R1C and R2A to R4B has been submitted in conjunction with the proposed site plan. The current development, as single-family units, conforms to the present R1C zoning designation for use, density, area, height and placement. The rezoning is proposed to allow for redevelopment of the site with multiple-family units. The R4B zoning district allows all forms of residential use – single-family detached, single-family attached, duplexes, townhouses and multiple-family buildings.

Site Plan – The proposed development layout has four rows of dwelling units, oriented east-west so that the roofs face south. The design and layout of the development has the appearance of five two-story townhouse buildings with individual front doors facing the driveway and back doors facing open space areas. The community building is located in the middle of the site along the west side, near Platt Road, with sight lines to each of the four rows of dwelling units. The proposed playground is on the east side of the site.

The new apartments range in size from one bedroom to five-bedroom units as follows:

- 8 one-bedroom units
- 12 two-bedroom units
- 6 three-bedroom units
- 2 four-bedroom units
- 4 five-bedroom units

Two driveways will provide access from Platt Road to two connected surface parking areas. The site will have all new underground utilities (water, sanitary sewer and storm sewer as well as private franchise utilities), fire hydrants, and storm water management facilities for the entire site.

Four landmark trees are located on the property, two of which are proposed to be removed. The predominant natural feature is the Swift Run creek (a County Drain) and its floodplain running along the entire east and south sides of the site. The floodplain encroachment ranges from approximately 35 feet into the site on the north property line, increases to 165 feet at its widest in the center of the site, decreasing to 30 feet near the south property line and is entirely contained within the creek banks at the southwest corner of the site. While the floodplain covers a significant amount of area of the site, it is generally less than 1 foot deep. Because the site is directly adjacent to, and its storm water will outlet to, a County drain, the Washtenaw County Water Resources Commissioner’s office has jurisdiction over this project for storm water management.

Two of the proposed dwelling units are located in the current floodplain, as well as the storm water pond. All dwellings are proposed to be built on slab foundations without basements. Compensating cuts on the site are proposed to offset filling in the floodplain for the two dwellings, the stormwater pond and general grading for the parking areas.

A conflicting land use buffer is provided along the north side of the property, including 23 trees plus a continuous hedge. Required interior vehicular use area landscaping and right-of-way screening is also proposed. Six new trees are proposed, located throughout the site, for mitigation of the two removed landmark trees.
Alternatives Analysis – Because natural features are proposed to be impacted, an alternatives analysis has been provided to show that the planned development has the minimum impact for a reasonable use of the land. The first submitted site plan indicated that avoiding any natural features impact could be achieved by significantly reducing the number of dwelling units proposed, however, it would not be financially feasible for the petitioner. Staff met with the petitioner to further discuss the natural features impacts and more financially feasible alternatives with the desired density.

It was determined that planned project modifications to allow a single mid-rise building, on the order of six to nine stories, or to allow decreased front and side setbacks and building spacing for two-story townhouse buildings would be necessary to further reduce the proposed encroachment into the floodplain. Still, it would not be financially feasible for the petitioner to construct a mid-rise building. Moving the proposed buildings much closer to the north and/or west property lines may not be desirable to either the future residents of the site or the existing residents adjacent to the site. Illustrations showing these concepts are being prepared by the petitioner and will be provided to the Planning Commission when available.

Citizen Participation - A citizen participation meeting was held on February 11, 2014, two weeks before the petitions were submitted. Invitations were sent to all residents within 1000 feet of the site. A second citizen participation meeting was held on July 28, 2014 to inform neighbors of the revised design that includes the parcel immediately north of the current Housing Commission development. Postcards for the second meeting were mailed to the original mailing list.

Attendees inquired about storm water management, the number of future residents, the AAHC’s other properties in the city, and vacant property owned by the AAHC on the west side of Platt Road near the subject site. The petitioner’s reports for both meetings are attached.

### SURROUNDING LAND USES AND ZONING

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<tr>
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<th>ZONING</th>
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<tr>
<td>NORTH</td>
<td>Multiple-family Residential</td>
<td>R2A Two-Family Dwelling District</td>
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<tr>
<td>EAST</td>
<td>Single-family Residential</td>
<td>R1C Single-Family Dwelling District</td>
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<tr>
<td>SOUTH</td>
<td>Single-family Residential</td>
<td>R1C</td>
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<td>WEST</td>
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### COMPARISON CHART

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<th>PROPOSED</th>
<th>REQUIRED/PERMITTED</th>
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<tr>
<td><strong>Zoning</strong></td>
<td>R1C Single Family Dwelling, R2A Two-Family Dwelling</td>
<td>R4B Multiple-Family Dwelling</td>
<td>R4B</td>
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<td><strong>Gross Lot Area</strong></td>
<td>135,472 sq ft</td>
<td>135,472 sq ft</td>
<td>14,000 sq ft MIN</td>
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<td><strong>Dwelling Units</strong></td>
<td>6</td>
<td>32</td>
<td>46 MAX</td>
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<td><strong>Min. Lot Area per Dwelling Unit</strong></td>
<td>22,579 sq ft/du</td>
<td>4,234 sq ft/du</td>
<td>2,900 sq ft/du MIN</td>
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<td><strong>Min. Open Space</strong></td>
<td>Unknown</td>
<td>70% (95,911 sq ft)</td>
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<td><strong>Min. Active Open Space</strong></td>
<td>Unknown</td>
<td>12,562 sq ft</td>
<td>300 sq ft/d.u. MIN (9,600 sq ft)</td>
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<td><strong>Setbacks</strong></td>
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<td><strong>Front</strong></td>
<td>49 ft and 60 ft</td>
<td>15 ft</td>
<td>15 ft MIN, 40 ft MAX</td>
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<td><strong>North Side</strong></td>
<td>24 ft</td>
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<td>12 ft + additional for building length over 50 ft MIN</td>
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<td><strong>South Side</strong></td>
<td>32 ft</td>
<td>28.2 ft</td>
<td>12 ft + additional for building length over 50 ft MIN</td>
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<td><strong>Rear</strong></td>
<td>38 ft and 255 ft</td>
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<td>30 ft MIN</td>
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<td><strong>Height</strong></td>
<td>Unknown</td>
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<td><strong>Vehicle Parking</strong></td>
<td>8 spaces</td>
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<td><strong>Bicycle Parking</strong></td>
<td>None</td>
<td>3 Class A, 3 Class C (6 total)</td>
<td>6 spaces MIN (50% Class A, 50% Class B)</td>
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### REZONING ANALYSIS

The petitioner requests to rezone the 3.1-acre site from R1C Single-Family Dwelling District and R2A Two-Family Dwelling District to R4B Multiple-Family Dwelling District to enable the development of a multiple-family apartment complex. Changes to the text or map of Chapter 55 (Zoning) can be made pursuant to Section 5:107 and 5:108. The following justification is offered by the petitioner (staff comments in italics):  

1. **The extent to which the rezoning is necessary:**

   To rectify the existing zoning to be consistent with the existing use and to allow a conforming use with the proposed zoning and proposed redevelopment program.  

   **Staff:** The current R1C and R2A zoning designations allow single family detached developments and duplexes and, in terms of use, the current development conforms to its zoning designation. Attached units of any kind are not permitted in the R1C zoning district, and only two attached single-family units (i.e. a two-family building) are allowed in the R2A district. The proposed R4B zoning designation allows for every type of dwelling unit: single family detached or attached, two-family, and multiple-family.
2. The rezoning will affect the public welfare and property rights of persons located in the vicinity in the following ways:

Will have no negative impact on public or [private] property as the property is currently developed and being used in a manner consistent with the proposed zoning.

3. The rezoning will be advantageous to the City in the following ways:

Will make the existing use conforming to the zoning district.

Staff: The proposed rezoning will enable the redevelopment of a dated housing community to provide affordable dwelling units that are more energy efficient and site improvements, such a conflicting land use buffer and storm water management systems, that meet current development codes.

4. This particular location will meet the convenience and service requirements of potential users and occupants in the following ways:

It is in an area of similar uses and housing, close to employment centers, and located on public transportation routes.

5. Any changed or changing conditions in any particular area, or in the City in general which may have bearing on the proposed rezoning are:

None.

6. Other circumstances and factors which will further justify the requested rezoning are:

The site has been used historically in a non-conforming manner. Rezoning will make existing use as well as proposed redevelopment conforming.

Staff: The subject site has sufficient size to justify a separate zoning designation. The R4B Multiple-Family Dwelling District is intended for smaller infill sites, such as this one, and its maximum permitted density, along with its minimum open space requirements, make the proposed zoning district the most appropriate zoning designation.

HISTORY

The Ann Arbor Housing Commission originally developed the southern part of site in the late 1960’s. The northern portion was purchased by the City of Ann Arbor on behalf of the Housing Commission in July 2014.

The Ann Arbor Housing Commission currently is undertaking a major transformation in the way it owns, operates, and maintains all of its scattered, small site low income housing developments. The Housing Commission is entering into a partnership with a private housing development company as the first such partnership under new U.S. Department of Housing and Urban Development regulations. Current and future residents of Ann Arbor Housing Commission dwellings will not notice any changes, except for improved services, and the partnership will provide much needed resources for the Housing Commission to offset their continually decreasing funding sources.
PLANNING BACKGROUND

The “Diverse Housing” goal in the Sustainability Framework calls for “high quality, safe, efficient and affordable housing choices to meet the current and future housing needs of our community, particularly for homeless and low-income households.”

Land Use Goal C in the Land Use Element calls for “a full range of housing choices (size, price design, accessibility, etc.) that meets the existing and anticipated needs of all City residents.” An action for this goal is “preserve and improve existing affordable housing, including public housing.

The Land Use Element of the City Master Plan recommends residential use for the subject site, including single-family detached homes on the southern third and single-family attached on the northern two-thirds of the site.

SERVICE UNIT COMMENTS

Systems Planning – Comments are pending.

Forestry/Natural Resources – Minor revisions to the plan are required.

Fire – A turnaround at each driveway/parking lot is required because each exceeds 150 feet in length.

Water Resources Commissioner – Preliminary plan approval, still pending, is required prior to Council action on the site plan.

Floodplain/Stormwater Coordinator – Staff has identified several items that need to be corrected on the plan. In particular, the current plan has not justified that the natural features (floodplain) impact is limited to the minimum necessary, as required by the review criteria of Chapter 57, Section 5:129. Staff does not support the proposed buildings and detention basin in the floodplain.

Planning – The R4B district is intended for “intermediate areas of the city, situated on small tracts of land in established areas for in-fill purposes”. It allows up to 15 dwelling units per acre and requires a minimum of 55% open space be provided. The proposed R4B district is generally in keeping with the future land use recommendations of the Land Use Element recommendations for this site and will support the implementation of the city’s affordable housing goals.

Planning staff and the Floodplain/Stormwater Coordinator met with the petitioner to discuss the comments regarding natural feature impacts. The petitioner is working to eliminate or further reduce the number of proposed buildings in the floodplain, as well as better articulate how the impact from those dwelling units remaining within the floodplain are relatively minor. However, the petitioner has indicated it may be difficult to locate more, or any, of the detention basin outside of the floodplain.

Staff’s split recommendation for approval of the rezoning petition and postponing the site plan petition will allow the first reading of the rezoning at City Council to be scheduled for September 2014. The site plan petition should be able to be return to the Planning Commission for action.
in two weeks’ time, on August 19, 2014, and could then be scheduled along with City Council’s second reading, public hearing and action on the rezoning petition in October 2014.

Prepared by Alexis DiLeo
Reviewed by Wendy Rampson
7/30/14

Attachments:  
February 11, 2014 Citizen Participation Meeting Report
July 28, 2014 Citizen Participation Meeting Report
Parcel/Zoning Map
Aerial Photo
Site Plan
Elevations

c:  Owner/Petitioner:  Jennifer Hall, Executive Director
    Ann Arbor Housing Commission
    406 North Ashley Street
    Ann Arbor, MI  48103

Agent:  Heath Hartt
        Midwestern Consulting, Inc.
        3815 Plaza Drive
        Ann Arbor, MI  48108

City Attorney
Systems Planning
Project No. Z14-003 & SP14-009
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Section 1: Notification
Information & Responses

A Citizens Participation Meeting was scheduled for February 11, 2014 at the Mallet's Creek Library. Notification cards were sent to 554 citizens within 1000 ft of the site using the City provided lists of owners and addresses. Contact information for the architect was provided on the card. Please see Appendix for copy of notification master.

Two cards were returned as undeliverable. No phone calls or emails were received before the meeting.

Section 2: Presentation

The Ann Arbor Housing Commission prepared and made available copies of Rent and Income Information related to the project. A copy is attached in the appendix.

Midwestern Consulting Inc. prepared a color rendered site plan which is attached in the appendix of this document.

Mitchell and Mouat Architects prepared colored renderings depicting the design of the proposed buildings.

View driving south on Platt Road

View looking across from North Building to South Building
Citizens were provided the opportunity to view the site plan and renderings before and after the meeting.

The Director of the Ann Arbor Housing Commission, Jennifer Hall, introduced the team at the meeting who included the project development partner, Lori Harris of Norstar, the civil engineer, Scott Betzoldt of MCI, and John Mouat of Mitchell and Mouat Architects.

Jennifer outlined the current situation of affordable housing in the City as well as the particular challenges presented at this site. The fundamental problems are that two of the four existing buildings are in the 100 year flood plain and get water infiltration on a regular basis and that all four buildings are of an age and condition that they are not worth rehabilitating.

A description was provided of the project which locates 20 units and a Community space (office and meeting room for residents) in two buildings. The unit mix includes 1, 2, 3, and 4 bedroom units on the site seeking Site Plan Approval as well as the plan to construct four five bedroom houses across the road on City property.

Sign in Sheets are provided in the Appendix.

Section 3: Citizen Information

Section 4: Citizen Concerns and Comments

Storm water management – Questions were asked centered on existing water conditions and how the site would respond to storm events. The design team described that the new site would meet City and County standards for storm water management which have changed considerably since the time the existing buildings were constructed.

Numbers of residents – Concerns were voiced generally about the number of people and related traffic at Platt Road. Ms. Hall provided figures related to number of people per unit.

Location of AAHC properties – Questions were asked regarding the location of AAHC properties throughout the City and whether properties are concentrated in the south east part of town. Ms. Hall described that they are distributed in many areas of the community with the most number of units being on the west side of the City.

City property on West side of Platt – A group of attendees live in houses that back up to the City property on the west side of Platt. They were concerned about the prospect of the AAHC building four single family houses on the four lots making up the property. It was described that; due to the fact that this property
is properly zoned for single family houses, no site plan approval is required and the project would go directly to the Building Department for review. In concept a shared drive would provide access to two houses off of Platt Road and a second shared drive would provide access to two houses off of Springbrook.

Follow up comments – In the couple of days after the meeting we received a phone call and an email. The first was a call from the property owner directly north of the proposed project voicing support for the project and is interested in talking with the housing commission about potential development on his property. The second comment was from a gentleman who attended the meeting at the library and wanted to express his support of the project. This email is in the appendix.

Please see the Appendix for:

a. Notification Card
b. Rent and Income Information
c. Rendered Site Plan
d. Sign In Sheet
e. Citizen email
Ann Arbor Housing Commission
Site Plan Submittal

Postcards are being sent to all residents and property owners living within 1000 feet of the project site giving notice that a site plan petition will be submitted to the City of Ann Arbor in late February. This is an opportunity to review and comment on the plans. The petitioner will consider your comments with regard to any plan revisions, in finalizing the submission.

Project Location: The site is located at 3451-3457 Platt Road, Ann Arbor.

Meeting: A meeting is going to be held on February 11, 2014 at 7pm at the Mallets Creek Branch of the Ann Arbor Public Library at 3090 East Eisenhower Pkwy, Ann Arbor to present the Plans for the project and to solicit input from neighborhood residents. The meeting location is barrier free accessible.

Description: The Ann Arbor Housing Commission is proposing to demolish the existing buildings on this site and replace them with an office and 21 new units ranging in size from 1 bedroom to 4 bedroom. The site will be upgraded to current City standards while preserving existing natural features as much as possible.

Contact Information: Mitchell and Mouat Architects, John Mouat, 734-662-6070 or jmouat@mitchellandmouat.com
Rent and Income Information
Maple Platt

The proposed project will include affordable residential rental units targeted to households with income levels at 30%, 50% and 60% of Area Median Income (AMI) levels. Below please find the income levels for a family of four (4) at the various incomes:

Average Area Median (AMI) for 4 person household–
National non-metro areas $52,500 Annually

Ann Arbor MSA Average Median Income (AMI) for
4 person household $87,400 Annually

Maple Platt Average Median Income (AMI) for
4 person household (60% AMI) $52,440 Annually (17 units)

Maple Platt Average Median Income (AMI) for
4 person household (50% AMI) $43,700 Annually (48 units)

Maple Platt Average Median Income (AMI) for
4 person household (30% AMI) $23,610 Annually (5 units)

Units at Maple Platt are targeted to households with incomes of 60%, 50% and 30% of Area Median Income; the proposed rents based upon the various income levels to be served at Maple Platt are as follows:

1 Bedroom Units - $466 to $947

2 Bedroom Units - $567 to $1092

3 Bedroom Units - $713 to $1223

4 Bedroom Units - $734 to $1365

5 Bedroom Units - $850 to $1508

* Based upon 2014 Income data; please note that the overall plan includes 70 units but site plan approval is being sought on only 62 units because the project includes the rehab of 4 units and the construction of 4 single family units.
<table>
<thead>
<tr>
<th>NAME</th>
<th>CONTACT INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paul Zevych</td>
<td>248.798.2699</td>
</tr>
<tr>
<td>Susan Phare</td>
<td><a href="mailto:spahre42@yahoo.com">spahre42@yahoo.com</a></td>
</tr>
<tr>
<td>Judy Shapiro</td>
<td>734.677.0093</td>
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<td>DJ Schuler</td>
<td>734.677.0093</td>
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<tr>
<td>Judy Weinburger</td>
<td>734-260-3229</td>
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<tr>
<td>Ed Jackson</td>
<td>Sharon</td>
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<tr>
<td>Cherie Burkett</td>
<td></td>
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<tr>
<td>Andrew Banka</td>
<td><a href="mailto:andrewbanka@gmail.com">andrewbanka@gmail.com</a></td>
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<tr>
<td>Sarah McCallum</td>
<td>734.975.2729</td>
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<tr>
<td>Flo Burke</td>
<td>734-971-3553</td>
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<tr>
<td>Lisa Jelic</td>
<td>734-476-2064</td>
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<td>Lance Mitchell</td>
<td>AAHC</td>
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<tr>
<td>K. Fazzari</td>
<td>734-975-2823</td>
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<tr>
<td>Vicki Davinich</td>
<td>734-417-0024</td>
</tr>
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</table>

Please Sign In

AAIC Floor Road CPN - 2/11/14
John Mouat

From: Andrew L. Banka <andrewbanka@gmail.com>
Sent: Thursday, February 13, 2014 9:05 PM
To: John Mouat
Subject: Platt Rd. Public Housing

John:

I wanted to reach out to you following the community meeting at the Mallett's Creek Library on Tuesday. I was frankly appalled at the extreme negative reactions from the people in attendance. The project seems well thought out and designed, and I hope that the project moves forward. I don't know if that kind of response is typical - perhaps it is. I would be happy to speak in favor of the project at the planning commission meeting if that would be helpful.

I will also pass my thoughts on to the woman from the public housing authority. I don't recall her name, but as she indicated that she would be passing information on to those who signed in, I expect that I will hear from her. Feel free to forward my comments and/or send me her contact information.

Regards,

Andrew Banka
City of Ann Arbor Map Disclaimer:

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This map complies with National Map Accuracy Standards for mapping at 1 Inch = 100 Feet. The City of Ann Arbor and its mapping contractors assume no legal representation for the content and/or inappropriate use of information on the map.

Map Created: 12/30/2013
1. SURVEY PROVED BY ATWELL FOR LOTS 70 & 71.
2. SURVEY PROVIDED BY MIDWESTERN CONSULTING FOR LOT 69.
3. SEE NATURAL FEATURES SHEET FOR EXISTING TREE SCHEDULE.
4. STREET CUT MORATORIUM IS IN EFFECT FOR PLATT ROAD. SPECIAL BITUMINOUS REPAIR METHODS REQUIRED PER CITY STAFF.
4. STREET CUT MORATORIUM IS IN EFFECT FOR PLATT ROAD. SPECIAL BITUMINOUS REPAIR METHODS REQUIRED PER CITY STAFF.

5. PARKING ILLUMINATION AND GENERAL SITE LIGHTING WILL BE DIRECTED DOWNWARD, HAVE CUT-OFF FEATURES TO PREVENT LIGHT POLLUTION AND WILL NOT GLARE INTO ANY BEDROOM.

6. IT IS ASSUMED THAT RESIDENTS WILL SECURE BICYCLES TO THE PORCHES AT EACH UNITS ENTRY DOOR AND WILL BE COVERED BY ABOVE ROOF OR RESIDENTS WILL SECURE THEIR BIKES INSIDE THE UNITS. THIS BICYCLE STORAGE METHOD IS PROPOSED IN LIEU OF REMOTE CLASS "A" BIKE STORAGE UNITS.
OPTION 1
Description: This option provides for 14 units, an office/clubhouse, 27 parking spaces in two lots and community open space. Detention is provided by an open basin.
Positives:
- Significant open space for residents
- No floodplain disturbance
Negatives:
- High per unit cost due to inefficient use of land
- Low density will require development of sites elsewhere
- Not supportive of public transportation

OPTION 2
Description: This option provides for 19 units, an office/clubhouse, 43 parking spaces in two lots and community open space. Detention is provided by underground chambers.
Positives:
- Significant open space for residents
- No floodplain disturbance
- Higher density helps lower costs
Negatives:
- High per unit cost due to inefficient use of land
- Low density will require development of sites elsewhere
- Not highly supportive of public transportation
- Underground detention drives costs higher

OPTION 3 - CHOSEN OPTION
Description: This option provides for 32 units, an office/clubhouse, 51 parking spaces in two lots and lessened amounts of community open space. Detention is provided by an open pond located in the floodplain.
Positives:
- Highest density and use of the land means most efficiency and lower per unit costs.
- Most supportive of public transportation
- Provides lower likelihood of development of other sites due to need.
- Allows the AAHC to change the development of the West Platt site while still maintaining the goals of the program.
Negatives:
- Storm water detention is in the floodplain
- Less usable open space

OPTION 4
Description: This option provides for 35 units, an office/clubhouse, 67 parking spaces in two lots and community open space. Detention is provided by underground chambers.
Positives:
- Significant open space for residents
- No floodplain disturbance
- Higher density helps lower costs
Negatives:
- High per unit cost due to inefficient use of land
- Low density will require development of other sites
- Not highly supportive of public transportation
- Underground detention drives costs up
- Underground detention requires less efficient design of watermain and sanitary sewer driving construction costs higher