



June 29, 2018

City Planning Commission  
208 Coleman A. Young Municipal Center  
Detroit, Michigan 48226

**Re: Brush Park CDC Response Letter – 112 Edmund, 2827 John R. and 105 Alfred Project**

Brush Park Community Development Corporation (the “CDC”) forwards this letter to provide our formal response regarding the development project presented with respect to the property located at 112 Edmund, 2827 John R. and 105 Alfred (the “Project”).

The Project has a long history of review before the CDC and the Brush Park community. The attached Exhibit A outlines our understanding of the Brush Park Properties, LLC and 112 Edmund, LLC (collectively, the “Developer”) community engagement on this project. The latest version of the Project was presented before the CDC and the Brush Park community at a public meeting held on Tuesday, June 12, 2018 (the “Meeting”). The majority of the community members present at this meeting expressed concerns and objections to this project. The specific questions and issues raised by the community during this meeting are summarized on the attached Exhibit B.

Much consideration was given to the Project by the CDC Board. By a vote of the Board of 1 in favor, 4 objections and 4 abstentions, the Board has voted to not support this project. The general consensus of the board is that while there are positive aspects of this project, critical issues that we believe may have a lasting negative impact on Brush Park remain unresolved. These issues have been previously communicated to the CPC and the Developer, but are restated here for clarity:

1. **Parking.** Several Board Members believe that the Developer is using conservative and outdated parking standards. The total provided is 140 spaces for 39 units + commercial/retail space. Other neighborhood developments within the Greater Downtown area are using more progressive standards (1 space per unit; often 0 spaces for commercial use), and the DRAFT Form Based Code (“FBC”) suggests more reasonable standards (1 space per unit max.; 1 space per 500 SF commercial max.); however, the developer is using the City of Detroit's generic zoning standard (rather than one of the City's more recent standards for transit-oriented neighborhoods) which leads to excessive parking spaces and induces driving as a mode of transportation. While recognizing that both residents and retail visitors still need some parking, a more reasonable amount might be around 94 total spaces provided (39 residential spaces + 55 commercial/retail spaces, using the Draft FBC ratios).

Several Board members feel that the parking deck concern is a derivative or responsible for most other concerns of the community: curb cut concerns, building height concern, and density. By reducing the height of the Edmund Building, utilizing the proposed "Commercial space" as residential to replace the lost floors on Edmund--possibly with highly profitable micro-

apartments, many of which would be students that are moving away from vehicles and embracing the walkable neighborhood concept, you would greatly reduce the amount of parking needed for the project, and possibly remove the need for a parking deck. At a minimum, CPC should request a traffic study to demonstrate the potential impact that the parking deck could have on the community and the immediate adjacent neighbors in particular.

The CDC recognizes the need for parking to support developments and that the community is also generally opposed to additional surface parking lots<sup>1</sup>. The CDC also acknowledges the Developer's assertions that they have built the smaller parking deck possible on this parcel. However, we are concerned about the precedent that this project may set for parking decks within our neighborhood, particularly as we are conveniently located near sports venues. To start building parking decks--which in a stadium district is highly profitable--on the east/west streets opens up the possibility of parking decks "tied to a business" going into every vacant lot in Brush Park.

2. **Curb cuts on Edmund and Alfred.** Several board members would prefer to adhere to the historic precedence of the neighborhood and avoid curb cuts. We recognize that previous development (e.g. Crosswinds) have incorporated them, however the curb cuts designed for this Project aren't intended for residents to park, but for thousands of retail/commercial patrons to use frequently, diminishing the safety and comfort for pedestrians on the street.

Additionally, some board members are concerned about the use of the alley for parking deck egress. Residents that use that alley as their only means of parking (since they don't have curb cuts) will likely be locked in to their parking spots during high traffic times, and will have to deal with the additional noise and pollution of those 1000s of vehicles standing and idling next to and behind their residences.

3. **Setback on Alfred Street.** All current and drafted development plans (3rd Modified, 4th Modified, Draft FBC, and City of Detroit Zoning Ordinance) specify where a development site shares a block face with an existing building, the new building should match that setback. These standards make sense because they help streets maintain an existing and consistent character, in this case a historic residential street. This is important in Brush Park so that our remaining historic homes do not fall into the shadows and so that east-west streets continue to feel residential.

The CDC acknowledges that the existing homes on the North side of Alfred have large setbacks and we understand that the Developer has reduced the set-back in order to accommodate community concerns regarding the façade of the parking deck. However, we are still concerned about lack of respect for the set back and the precedent that this may set for future development.

4. **Building Height.** We acknowledge that the CDC previously voted to support the 7 story height of the 112 Edmund building, but add that this vote was taken prior to concerns from owners and residents of the Carlton being brought to the CDC's attention. Several of our board members continue to express concerns regarding the height of 112 Edmund, irrespective of its effect on views at the Carlton. Some are concerned that an additional 7 story building may set a new, undesirable precedent for the neighborhood and whether the height is in the spirit of the

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<sup>1</sup> To clarify, the community is opposed to new surface parking lots, but is not seeking to disqualify existing approved surface parking lots, such as the lots located at 3411 Brush, 2458 Brush, 234 Winder, the lot north of 2915 John R., and 114 Erskine. We reserve the right to consider parking accommodations on a case by case basis.

4th Modified Plan where the community envisioned and it was written that tall buildings should be allowed only where the site abuts Woodward. This has the potential to diminish the historic character of our neighborhood. We understand that the City has approved (and the community supported) a Bedrock project of similar thought smaller height and massing on John R, however, how does the City envision protecting the historic and residential feel of our neighborhood while continuing to allow for building at higher heights on John R and/or Brush?

While the foregoing expresses our concerns, there are positive aspects to this project which many board members have acknowledged. For example, the Board is appreciative that the Developer is choosing to retain and restore the historic structure at 2827 John R. Board members are also generally receptive to the spirit of this Project, the aesthetic of it, and many of the design elements that incorporate the history of the neighborhood. The Board also acknowledges again that the Developer has been very engaged in the community and has made significant changes to accommodate community concerns. However, Board members are wary of the precedence this sets for future developers, developers who will not likely be as engaged to the community as this development team has, and will use this Project as precedence to ignore the character and assets that we are protecting and building in our neighborhood - a neighborhood whose historic homes are so popular they are known by their names and not their street numbers.

Lastly and perhaps most importantly, the Board is asking that the issue of the lack of modified development plan for Brush Park be resolved with expediency. We believe that many of the issues presented before the community with respect to this Project would have been avoided had the appropriate City entities timely adopted a modified development plan for our neighborhood. It is not fair to Developers or the community to be continually asked to decide these issues of policy. We understand that the demise of previous plans was beyond the City's control, but it is time for the City to act with diligence and ratify a set of standards for development within Brush Park.

We ask that the feedback set forth in this letter be considered by CPC and Detroit City Council in determining how to move forward with this project.

Sincerely,  


Karissa Holmes, Brush Park CDC Secretary

Cc:  
Brush Park Properties, LLC  
79 Alfred Street  
Detroit, MI 48201

112 Edmund, LLC  
449 E. Milwaukee Blvd.  
Detroit, MI 48202

**Exhibits:**

Exhibit A – Community Presentation History for the Project as of May 25, 2018  
Exhibit B – Excerpt of Minutes from June 12, 2018 Community Meeting

**Exhibit A**

**Community Presentation History for the Project as of May 25, 2018**

See attached.

**BRUSH PARK COMMUNITY DEVELOPMENT CORPORATION**  
**112 Edmund, 2824 John R. and 104 Alfred Development History**  
Updated as of May 25, 2018

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- The 112 Edmund project was first presented to the community at our October 14, 2014 public meeting. The developer requested CDC support for the sale of the city owned property as well as the design of the proposed development. The community was receptive to the development of the parcel but did not like the design.
- The developer presented updated drawing (based on community and HDC feedback) at our November 10, 2015 public meeting. The community was much more receptive of the design of this building, but there were still design flaws discussed at the meeting. See item #16 on our website for presentation materials.
  - The CDC formally supported the sale of the city owned property to support the development. In our support for the sale, the CDC expressed concerns about design flaws, including whether the design was respectful of the adjacent historic homes and inactive frontage on John R., with the understanding that the developer would continue to work with the HDC and the community through these edits and seek additional support for the design in the future.
- In 2017, the 112 Edmund project was collapsed into a three parcel development of the properties located at 112 Edmund, 2824 John R. and 105 Alfred. The developers presented the revised project to the community at our November 14, 2017 public meeting. The developer requested (a) support for the sale of the vacant parcel of land at 112 Edmund and (b) support for a proposed 7 story height for the 112 Edmund building. Both of these issues were discussed with the community members present at the public meeting. See item #3 on our website for presentation materials.
  - Because of the status of the form based code we specifically discussed the height with the community at the meeting. Several community members voiced their support for the height because there are already tall buildings on John R. and the height would be in-line with and blend well with the height of other buildings on John R. There were still concerns about ensuring that the structure height respected the abutting historic home and we discussed stepping the building height down to do so (similar to what was done with a City Modern parcel), but generally the community members present supported having buildings of that height on John R.
  - In February 2018, the board voted to support the 7 story height of the building, but abstained from voting on the land sale of 112 Edmund primarily due to the 105 Alfred project. The developer presented these three developments as integrally connected and because the community was not presented with adequate information concerning the parking deck, we abstained from voting until more information was provided.
- The developers attended our March 13, 2018 community meeting to show more detailed plans concerning the 105 Alfred parcel. Several members of the community expressed passionate objection to the parking deck size, height, location and traffic flow. Residents of the Crosswinds development in particular were concerned about traffic backing up and the inability to access their only access to their homes (off Edmund). The owner of the historic property across the street from 105 Alfred was (among other objections) very concerned about retail activities that far into the interior of the street and how that would negatively impact a residential living experience. On the other hand, other community members also expressed the need for additional parking in the

neighborhood and the general aversion to surface lots. They expressed that a parking deck would best serve the needs for residents and visitor of the retail/commercial spaces at the 3 parcel development, but had concerns around traffic flow and ingress/egress planning,

- The board took a formal vote on the 105 Alfred project, with the majority of the board members not supporting the project as presented at the March 13 meeting. Generally, the board felt that a traffic study needed to be conducted to illustrate feasibility and impact. In addition, board members still had concerns about the location, design and size of the deck as well as whether it was an appropriate use of the parcel. Because of the failure of this vote, the board did not revisit the approval of the 112 Edmund land sale vote.
- On March 15<sup>th</sup>, a CPC hearing was held regarding this project.
- On March 21, 2018, the developer held a special meeting at his office at 79 Alfred to discuss the concerns on the 105 Alfred development with community members. A CDC board member attended this meeting. CPC also attended this meeting. During this meeting, the community members discussed their concerns in detail with the developer, which the developer took under review.
- On April 4, 2018, the developer held as a special meeting at his office at 79 Alfred to present additional revisions to the project based upon community feedback. A CDC board member and CPC attended this meeting. The community members were very impressed with the significant changes that the developer made to the property in accommodating the community concerns and were satisfied with the latest plan. The board was confident that the open issue on the parking deck was resolved and that the community was generally supportive of the development as a whole.
- On April 13, 2018, the CDC was informed for the first time of the collectively objections from the Carlton residents to the development. In light of the concerns expressed and the CPC decision to hold another formal public hearing, the CDC did not move forward with another formal vote of the project.
- The Carlton representatives and the developers participated in a conference call on Tuesday, April 17, 2018 to discuss the Carlton objections to the project. CDC board members participated in this conference. Major concerns included on the 112 Edmund building were the impact of the 7 story height of the building on the views of the south facing Carlton units and the intended commercial uses within the building.
- On May 1, 2018 CPC notified the Carlton representatives and the developers of a 2<sup>nd</sup> CPC public hearing scheduled for the project on May 17<sup>th</sup>.
- It is our understanding that on May 2, 2018, the developer and the Carlton representatives met in person to discuss the Carlton residents' concern.
- On May 17, 2018, CPC held a 2<sup>nd</sup> public hearing for this development, to which the Carlton residents attended and voiced their objections to the project.

We understand that additional meetings between CPC, the developers and the Carlton representatives have occurred (and continue to be scheduled) as the parties continue a dialogue concerning this project.

**EXHIBIT B**  
**Excerpt of Minutes from June 12, 2018 Community Meeting**

The following is an excerpt of the meeting minutes for the June 12, 2018 community meeting, summarizing the questions and concerns raised by the community concerning the development and discussion occurring during the Meeting.

- **Question from community member as to why there are commercial uses within this development in a residential area.** Developer elaborated on the intended commercial uses, such as a yoga studio, as examples of businesses that would add to the vibrancy of the neighborhood. Board members added that commercial uses are permitted under the current development code.

- **Concerns about the 112 Edmund building dwarfing the Lucien Moore house next door.** Community member asked why is there no step down on the 112 Edmund building like the Bedrock building across the street? Developer explained that the 7th story is set back. Developer explained that the materials used on the West facing side of the building are designed to complement the Lucien Moore House. Developer reviewed the structure changes made to the west side of the building to allow more visibility of the Lucien Moore house from a John R. view.

- **Question regarding the carriage house on John R. Community member asked why the developer would not put the taller building on the site of the carriage home.** Developer explained that the existing carriage home could not support the size of the 112 Edmund building. Community member asked whether the carriage home was on the historic registry - asked why it was so special to the developer and suggested that the developer demolish the building to accommodate having the taller structure on that site. Developer expressed the importance of his team of keeping the existing structure and creating a structure that is both modern and historic within the neighborhood.

- **Question regarding traffic study related to the parking deck.** Community member from Woodward Crossing conveyed concerns about traffic congestion from entrance of parking garage and asked whether a traffic study been completed. Developer responded that they have looked at traffic flows but not commissioned a traffic study. Community member asked the CDC to require the Developer to complete a traffic study. Board Member responded that we could not require, but could request CPC to do so, and that the Board has already communicated that to CPC informally. Another community member stated they conducted their own traffic study that amounted to 250,000 entrances and exits out of the development per year.

- **Comment regarding use of the parking spaces.** Community member asked the developer to reiterate the commitment that not one parking space would be used for visitors to the stadiums. Developer responded that the intent of the parking is to support the residential, restaurant and commercial uses within the space, but that they could not guarantee that a person would not say they are going to the restaurant and not go, or go the restaurant and walk to LCA after.

- **Question regarding lack of engagement of Carlton residents.** Community member expressed strong frustration and disappointment in lack of engagement between Developers and Carlton residents. Asked why the developer worked to address concerns at 105 Alfred but did not make changes to address concerns of Carlton residents with 112 Edmund. Developer responded that he did meet with the Carlton to review concerns. Community member complained that CPC seemed in a rush to approve this project and asked that the CDC demand CPC to post-pone this matter for 60-90 days and require the

Developer to address the Carlton's concerns. Another community member re-iterated displeasure with lack of engagement from the Developer with Carlton residents. Stated that he was in favor of development, but only the right development (without specific comment on what that would entail). Same community member subsequently voice concern about height of the 112 Edmund proposed building blocking his views.

- **Comments regarding the height of 112 Edmund.** Community member purchased a south facing unit at the Carlton with an expectation of views and that the building would block views and lower his property value. Community member expressed displeasure that when he purchased, he relied on the current development plan for Brush Park and he is disappointed that the code could be changed (reference to form based code) that would negatively affect his property. Board member clarified that real estate laws and ordinances do not entitle property owners to views and that ordinances can change. Another community member commented that he was a developer (not affiliated with Brush Park Properties LLC or 112 Edmund LLC developers) and his opinion was that the development would increase everyone's property value. Original community member clarified that it is not just property value that diminishes the value to him and that the view was a principal reason why he purchased the property that he purchased.

[End of Excerpt of Minutes from June 12, 2018 Community Meeting]