

Subject: Comments on Chapters 1-3
Attachments: Comp Plan edits - Westphal.pdf

From: Kirk Westphal
Sent: Tuesday, April 15, 2025 12:01 AM
To: Planning <Planning@a2gov.org>
Subject: Comments on Chapters 1-3

Dear Commissioners:

Thank you for the time and effort you are putting into the Comp Plan.

Please find attached a chart of suggested edits for the first three chapters, which is mostly a historical preamble for the substantive part of the document. Unfortunately, some of the content from the consultant attempts to once again build a case for subsidizing office buildings and "preserving" legacy businesses (Innovation and Flex districts). I'm confused why these are still in there.

Also note that while the first three chapters are about 40 pages in total, Chapter 4 on its own is over 50 pages and resurrects several recommendations that CPC has previously dismissed. (I am surprised that most of pgs 64-75 were included — I hope most of it can be discarded.) I imagine that discussing Chapter 4 and 5 will each take as much time separately as the entirety of Chapters 1-3 together.

Something I learned from writing the Sustainability Framework element of the Comprehensive Plan, which summarized 28 entire plans onto 8 pages: fewer words are better. When there's too much prose around an idea, especially words that "both sides" an issue, you are providing fodder for future debates even if you think a question has been settled. Sentences that seem harmless to include as "extra information" or "context" are generally not a good idea. Please be bold and focused when editing your Plan!

Sincerely,
Kirk Westphal
734-660-9955

Chapter	Page	Original		Type of change			Reason
		Text	Graphic	Replace With	Omit	Add	
1	9					Map showing taxable value per acre	It would be helpful to understand the relationship between density and taxable value.
1	17	Commercial property values are rising faster than residential values and some commercial properties also generate more value per acre.			X		Needs citations or should be struck. Also, is the fact that <u>some</u> commercial may generate more than residential a reason to subsidize it?
1	17	To foster economic diversification, the city must balance the urgent need for affordable housing with strategic commercial development, creating opportunities for emerging businesses and reducing its reliance on the University.			X		This sounds like building a rationale for the rejected Innovation District. Reducing reliance on UM has not been an expressed priority of CPC or the community.
1	18	While new housing generates revenue for the city and helps capitalize the affordable housing trust fund, losing the non-residential tax base will shift an even greater burden onto residential properties (both traditional and commercial multi-family), further impacting affordability.			X		Logic problem. How is residential land "burdened"?
1	19	Commercial properties add revenue to the city and require less spending on service than residential developments.			X		The building that gets built at a high density will add the most revenue. A high-rise residential building will always be better than a low-rise office, no matter the small differential in police and solid waste.
1	20	Ultimately gentrification, the proximity to downtown and increased property values priced out long-time residents.		Ultimately, the proximity to downtown and increased property values priced out long-time residents.			The word "gentrification" is a distraction because it has no clear definition or solution. The problem is "displacement," which is covered.
2	32	Residents emphasized the need to create more jobs that pay livable wages and anti-displacement work for existing businesses as an equitable approach.			X		This has not been a stated goal of CPC; it is a justification for a Flex district.
3	40	Let's make space for and build... Circular Economy Resource reuse, recycling and repair to support new life for materials and second-hand goods... Businesses From new and emerging jobs of the future to essential services and trades and everything in between.			X		These are more justifications for residential exclusion and a Flex district. It is not logical to downzone entire districts for the sake of locating a new sorting facility or thrift store in the city limits or promoting legacy business preservation.
3	41	Let's ensure we retain... Diversity In the people and places that call Ann Arbor home.	Industrial business		X		CPC has rejected the notion of subsidizing legacy businesses or keeping regions downzoned. Strike the text as well as text and graphic advocating for preserving Industrial business.