



Advisory Neighborhood Commission 5E

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ANC 5E RESOLUTION No. 2020-0____ FEEDBACK ON THE DRAFT COMPREHENSIVE PLAN

WHEREAS, the DC Comprehensive Plan seeks to establish a positive, long-term vision for the District, through the lens of its physical growth and change, and in so doing, addresses a variety of urban issues including land use, zoning impact, and budget, and ensures compatibility among 40 other planning documents; and

WHEREAS, the most recent DC Comprehensive Plan was adopted in 2006 and amended in 2011; and

WHEREAS, in consideration of the District's recent significant population growth and associated development, land use changes, and displacement of a significant number of longtime tenants and owners, it was determined in 2016 that the Comprehensive Plan was in need of additional amendment to reflect current and anticipated future challenges – especially related to housing, equity, resilience and public resources;

WHEREAS, the amended DC Comprehensive Plan as currently proposed, includes: two maps (Future Land Use Map and Generalized Policy Map), three context elements (Framework, Introduction, Implementation), 12 City-wide elements (Land Use, Economic Development, Housing, Arts & Culture, Environmental Protection, Transportation, Community Services & Facilities, Educational Facilities, Urban Design, Historic Preservation, Infrastructure, Parks/Recreation/Open Space), and 10 Area Elements/Plans (Capitol Hill, Central Washington, Far Northeast & Southeast, Far Southeast & Southwest, Lower Anacostia & Near Southwest, Mid-City; Near Northwest, Rock Creek East, Rock Creek West, Upper Northeast); and

WHEREAS, some neighborhoods have been shifted to different Area Elements, as is the case for some of the neighborhoods (that formerly comprised the Mid-City East Area) represented by ANC 5E, and within their new Area Plans, the revised Plans do not always fully present the land use, environmental, cultural histories, and social, economic, health, and educational needs of these neighborhoods, thus necessitating additional scrutiny by ANC 5E and City officials; and

WHEREAS, the amended DC Comprehensive Plan is to be approved by the DC Council in 2020, after undergoing two rounds of public review and comment – the second round of which is currently in process; and

WHEREAS, ANC 5E has longstanding interest in the Comprehensive Plan and its potential impact on the neighborhoods served by ANC 5E including Bates, Truxton Circle, Bloomingdale, Eckington, Edgewood, Hanover, and Stronghold; and

WHEREAS, consistent with such interest, ANC 5E and several of its individual Commissioners have: a) attended numerous forums, sponsored by the City and community organizations, on the current amendment of the Comprehensive Plan and its potential positive and negative impacts; b) submitted a May 5, 2018 Resolution entitled “The Comprehensive Plan and Affordable Housing”; c) solicited comments from constituents; and d) submitted comments during the first round of public review; and

WHEREAS, DC law stipulates that duly approved comments of ANCs to District agencies and officials are to be given “great weight”; and



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THEREFORE BE IT RESOLVED, ANC 5E approves and submits to the DC Office of Planning the attached comments and edits (Attachment A: General Comments and Attachment B: Text Amendments) on the draft Comprehensive Plan.

THIS RESOLUTION came before ANC 5E at a duly noticed and called meeting of the Commission held at Friendship-Armstrong Public Charter School on January 21, 2020. ANC 5E consists of ten (10) Commissioners, the presence of six (6) of which constitutes a quorum. With ___ members present, by a vote of ___ in favor, ___ opposed, and ___ abstentions, ANC 5E voted to adopt this resolution.



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Attachment A General Comments

- Oppose an increase in density for Square 3102 along North Capitol Street, NW. Any major change to the height and density of the church and the two story rowhouses at 1714- 1722 North Capitol Street would have an extremely disruptive impact on the neighborhood in general, and that square in particular.
- The baseline density for the city should be moderate-density mixed-use; areas close to transit should be high-density mixed-use.
- Eliminate parking-minimum requirements, minimum lot size requirements, or setback requirements.
- Support the changes in how D.C.'s "established" neighborhoods should be "supported" instead of "protected."
- The Comprehensive Plan should incorporate more language from HUD's Affirmatively Furthering Fair Housing rule.
- Support more affordable and more dense housing in wealthy parts of the city, specifically Rock Creek West, Near Northwest, and Capitol Hill.
- Acknowledge the destructive history of restrictive covenants and housing discrimination in D.C. that has brought us to this plan.
- Commit to supporting more than just the three "centrally" located legacy arts districts mentioned in the draft Comp Plan Arts and Culture Element (the Downtown Arts District, the Uptown Arts District and the H Street NE Arts District).
- Acknowledge and support the "important role parks play in recreation, aesthetics, health and wellness, neighborhood character, and environmental quality, and resilience."
- Integrate human support and resource services (social services, police, gov't offices, etc.) as well as integral private retailers – such as grocery stores – into multi-use buildings proposed in the neighborhood to address the basic needs of families and communities.
- Integrate green space, new neighborhood parks, and the planting of additional trees in strategic areas to mitigate environmental concerns and to impact traffic flow.
- Take a more general, less granular approach to amending the FLUM, with an eye toward converting and upzoning areas near commercial corridors and public transit to higher density, mixed uses. For example 2801 8th St. NE is designated Residential-Moderate Density/ Commercial-Low Density, while 2800 8th St. NE – directly across the street - is designated Production & Technical Employment. Both of these properties will soon sit between two major, higher-density, mixed-use developments, and they are equidistant between two nearby metro stations.



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Attachment B

Proposed Text Amendments

SUBMITTED BY	ELEMENT (e.g. “Land Use”, “Housing”, “Mid-City”, “Upper Northeast”, etc.)	CITATION, POLICY SECTION # & TITLE (e.g. “Policy MC-1.1.1 - Neighborhood Conservation”). If proposing a new section, write “NEW”	CURRENT CONTENT WITH PROPOSED DELETIONS AND INSERTIONS	RATIONALE OR PROPOSED AMENDMENT – If necessary
ANC 5E07 Commissioner	Mid-City	NEW	<p>NEW</p> <p>The Mid-City Planning Area includes the neighborhoods of Mount Pleasant, Lanier Height, Adams Morgan, Columbia Heights, Shaw, Park View, Pleasant Plains, LeDroit Park, Bloomingdale, and Eckington. In 2014, the final Council-approved version of the Mid-City East Small Area Plan (MCESAP) was released. This plan was developed in response to the activism of residents and civic associations – which, along with the ANC, were highly engaged and involved in its development (see p. 4 of MCESAP). This Plan focused on the neighborhoods of Bates/Truxton Circle and Hanover (both in the Near Northwest Area Element), Sursum Corda (in the Central Washington Area Element), sections of Edgewood and Stronghold (both in the Upper Northeast Area Element), and Bloomingdale, Eckington, and LeDroit Park (all in the Mid-City Area Element).</p> <p>According to the MCESAP, these neighborhoods reflect a “political amalgam”, the boundaries of which “...were designed to encompass those neighborhoods situated around a contiguous portion of North Capitol Street that had yet to have an approved small are plan to guide land use and development, filling an important gap in planning for this part of the District of Columbia. Sursum Corda, while already</p>	



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			<p>addressed in the Northwest One Plan, was also included to address that community’s intent to redevelop their property while retaining affordability.” The MCEAP authors conclude, “The many voices of Mid-City East community emerged to define a cohesive vision for the area: improve quality of life and enhance neighborhood amenities and character while supporting a community of culturally, economically and generationally diverse residents”.</p> <p>However, the reality that the MCEAP encompasses neighborhoods in four Area Elements might possibly result in inconsistencies/conflicts between MCEAP recommended policies and actions and those of the relevant Area Elements. Consequently, in consideration of exceptional civic engagement/involvement of residents, civic associations, and ANCs in the development of MCEAP, and the breadth of detail in MCEAP, when such inconsistencies/conflicts are encountered, deference should be given to recommendations of MCEAP – except when it can be proven by city officials, developers and affected residents that the MCEAP recommendation(s) is outdated and now inappropriate.</p>	
ANC 5E07 Commissioner	Mid-City	Policy MC-1.1.4 – Local Services & Small Businesses	<p>Protect the small businesses and essential local services that serve Mid-City. Encourage the establishment of new businesses that provide these services in areas where they are lacking, especially on the east side of the Planning Area by establishing small businesses in demographically changing neighborhoods that are predominantly residential in character. This program would serve to incentivize and stabilize small businesses in residential neighborhoods by providing technical assistance with business operations, assistance with increases in rent or property tax, and incentives to engage in cooperative activities (e.g., joint purchasing of equipment, supplies and inventories; trash disposal and other contracts with neighboring businesses), and collaborative efforts(with neighborhood residents and organizations. There is an additional need to recognize through DCRA and ABRA regulations, the unique storage, garbage disposal, and</p>	



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			<p>traffic/parking challenges of small businesses (especially small restaurants with limited space operating in rowhouse neighborhoods).</p>	
ANC 5E07 Commissioner	Mid-City	Policy MC-1.1.8 – Traffic & Parking Management-	<p>Improve traffic circulation along major Mid-city arterial streets, with a priority on 14th St., Georgia Avenue, U. Street, 18th St., Columbia Road, Connecticut Avenue and North Capitol Street. Whenever possible, prior to the initiation of any proposed ‘dense’ development in these areas, develop detailed plans of programs to improve bus circulation, pedestrian & cyclist safety and ease of travel, and programs to mitigate the effects of increased traffic on nearby residential streets. Tax incentives might also be provided to nearby homeowners who improve their property through construction of a parking pad in their rear yards – thus improving safety on narrow neighborhood streets, and increasing the availability of on-street parking for those without rear yards and visitors.</p> <p>In consideration of the estimated additional 20,000 to 30,000 car trips per day associated with the development of the McMillan Sand Filtration site and the additional traffic impact of development of the Old Soldiers’ Home sites, conduct a comprehensive North-South traffic study of North Capitol Street. (currently classified as “at failure” by DDOT -- especially south of Michigan Avenue), from Hawaii Avenue to New York Avenue and associated impacts on adjacent residential streets.</p> <p>Promote business activity on North Capitol St. between R St. and New York Avenue by requiring all new construction of moderate & medium density mixed-use buildings that include commercial space of 15,000 or more square feet to provide limited underground public parking. Consistent with the Transportation Element of the Comprehensive Plan....[maintain remainder of this paragraph]</p>	



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ANC 5E07 Commissioner	Mid-City	Action MC - 2.7.A – North Capitol Revitalization Strategy	At end of existing language ADD: In consideration that nearly 45% of the recommendations of the approved Mid-City East Small Area Plan identify the ‘community’ as the responsible implementing or supporting party, the Office of Planning and other appropriate DC government Offices/Departments (e.g., DDOT) should be encouraged to develop a process for timely formal review and comment on planning and design reports prepared by voluntary neighborhood/civic/nonprofit groups to determine the reports’ consistency with the Comprehensive Plan and approved Small Area Plans. If determined to be consistent and feasible, such Offices/Departments would seek to encourage potential public-private partnerships and other mechanisms that could provide technical and funding resources for implementation of the reports’ recommendations.	
ANC 5E07 Commissioner	Mid-City	Action MC-2.7.2A	NEW ITEM As a means of maintaining, improving, and preserving the unique character of Mid-City while fostering civic engagement, resident diversity, apprentice training, and subsequent employment of Mid-City residents, District government should encourage the establishment of Public/Private Partnerships that would provide materials and labor for exterior façade painting of homes owned by Mid-City elderly lower & moderate income residents. Extend this high impact and low-cost model to other Planning Areas. Identify other needs of DC’s special populations that might benefit from such an engagement/diversity/training/employment approach.	
ANC 5E07 Commissioner	Land Use	Policy LU-1/303: Shaping the city	New Item to be placed at end of LU-303: Supporting growth and assessing its sustainability. The history of DC and other American cities demonstrate that growth is not continuously sustainable. Growth is to a large degree a function of supply and demand. In the case of Washington, DC, current growth is associated with decreasing financing interest rates and unique demographic patterns. More than 200,000 black residents have left or	



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			<p>been forced out of the City. Most of the City’s recent newcomers are overwhelmingly white, young adults (25 – 40 years of age), who are more often than not unmarried and/or without children. As this cohort ages, lifestyle changes are to be expected. In addition, supporting the current lifestyle of newcomers requires significant investments (e.g., multi-modal transportation, entertainment and ‘play’ venues, infrastructure, utilities development, etc.) As these persons age, it is probable they will seek larger family-style housing and less intense social and residential environments. Changing economic and financing environments will also impact their lifestyle and City resources.</p> <p>Consequently, there is a need to continually assess not only the means for supporting growth, but also the limits of growth. For the latter, the objective is to avoid unsustainable growth and City revenue deficits. The past two years have been marked by a progressive decrease in the number of newcomers to our City. There is a need to <u>establish a matrix of indicators of the sustainability of growth</u> (such as number and status of child and elderly populations, quality of life, affordability, infrastructure needs and costs –new & in need of repair/replacement, population needs, roadway use & capacity, environmental impacts, quality of public education, changes in social/economic inequality, commercial and residential occupancy rates as well as average length of tenancy/occupancy (especially in mixed use development/districts), financing trends and rates for infrastructure and building construction, job creation rates, DC financial resources and surpluses/deficits, etc..). A report should be issued no less frequently than every two years on the changing status of such indicators.</p>	
ANC 5E07 Commissioner	Land Use	Policy LU- 2.1.1/ 309.6: What makes a great Neighborhood	Modify 2nd bullet to read: Easy access to shops and services meeting day-to-day needs, such as child care, groceries, and sit-down, buffet & carryout restaurants reflecting varying price points. In inclusive neighborhoods, shops & services collectively intentionally acknowledge the diversity of residents by reflecting their varying	



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			needs, cultural preferences, and economic means. Zoning and planning decision-makers should reflect this principle of diversity/inclusion in all of their deliberations and decisions.	
ANC 5E07 Commissioner	Land Use	Policy LU – 2.2.4: Neighborhood Beautification	Modify to read: Encourage the development of public-private partnerships for projects (especially those initiated by residents) which that improve the visual quality of the District’s neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, murals, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements, and public realm enhancement and activation. Whenever feasible, link such efforts to apprenticeship training programs	
ANC 5E07 Commissioner	Land Use	Policy LU-2.2.5: Enforcement of approval conditions	Modify to read: Fully enforce conditions of approval for new development, including design, building, and operating criteria. In the event, after approval, an applicant subsequently requests a significant change in design or use that previously had been reviewed and/or approved by an ANC, applicant will be required to return to that ANC to seek approval of proposed significant change in design or use	
ANC 5E07 Commissioner	Land Use	Policy LU-2.1/309.4: A city of neighborhoods	Modify to read: During the coming decades, the District will keep striving for greater equity across all neighborhoods in terms of access to housing, job opportunities, economic mobility, energy innovation, and amenities increased stability in its transitional, emerging, and distressed neighborhoods. In regard to affordable housing, greater emphasis should initially be placed on creating such housing units in those neighborhoods currently having lowest density and/or lowest number/percentage of affordable units (see Table 5.6 of Comp Plan). This does not mean that all neighborhoods should become the same[remainder of paragraph should remain as is.]	
ANC 5E07 Commissioner	Land Use	Policy LU-2.1.14/ 309.18a: Planned Unit Developments in	Modify to read: Planned Unit Developments (PUDs) in neighborhood commercial areas should provide high quality developments with active ground	



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		Neighborhood Commercial Corridors	floor designs that provide for neighborhood diverse commercial uses, vibrant pedestrian spaces and public benefits including housing, affordable housing, and affordable commercial space, with exceptional attention given to multi-modal transportation, traffic and parking impacts.	
ANC 5E07 Commissioner	Land Use	Policy LU-2.2.6/ Public Stewardship	Support efforts by local Advisory Neighborhood Commissions, citizen/civic associations, garden clubs, homeowner groups, and other organizations to initiate neighborhood improvement and beautification programs. Provide information, guidance, and technical assistance and when possible access to public-private partnerships and other public and private funding sources, to these groups as appropriate and feasible.	
ANC 5E07 Commissioner	Land Use	Policy LU-2.3.6/311.8: Places of Worship and other Religious Facilities	Modify to read: Recognize places of worship and other religious facilities as an ongoing, important part of the fabric of the city’s neighborhoods in a manner similar to that accorded small businesses. Work proactively with the faith-based community, residents, ANCs, and neighborhood groups to address issues associated with these institutions’ transportation, public street parking needs , operations, viability , and expansion, ... <i>[maintain remainder of this paragraph]</i>	Churches in my SMD have progressively lost access to Sunday on-street due to increased Restricted Residential Parking. This has resulted in increased non-attendance – especially by elderly & disabled members.
ANC 5E07 Commissioner	Land Use	LU-3.4/317: Group Housing	COMMENT All of the Land Use language related to Group Housing for Special Needs Populations has been deleted. Such housing, of which there are many in ANC 5E, are licensed facilities, often requiring zoning variances or adjustments, and typically operated by private entities contracted by the City, and inequitably distributed throughout the City. When such facilities are well-operated, they can be benefits to both the neighborhood and facility residents. But when they are poorly operated, they can be the source of concern for the neighborhood with	



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			unmedicated, self-medicated, unsupervised facility residents engaging in atypical and sometimes bizarre public behavior. <u>It is strongly recommended that the Comp Plan include language related to zoning, licensing, contracting, operation, and supervision of such facilities, and their expected contributions to strong inclusive neighborhoods.</u>	
ANC 5E07 Commissioner	Transportation	Action T-1.4.A/NEW: Develop a Placemaking in Public Space program	Develop a Placemaking in Public Space program within DDOT. DDOT should encourage and actively promote opportunities for enhancement in ineffective and under-used spaces citywide – especially in residential neighborhoods. Any enhancements within the public realm should prioritize safety and functionality of the space and carefully consider the impacts of the change to the space prior to any modifications being made. As a means of promoting the use of arts and streetscape in creating a sense of ‘place’, Developers of commercial space of more than 100,000 square feet or more, should be required to set-aside at least 1.0% of their construction budget for the building’s public art and/or beautification enhancements to be selected/ designed in consultation with neighborhood residents.	
ANC 5E07 Commissioner	Housing	Action H-1.1.A/503.9: Rezoning of Marginal Commercial Land	AT THE END OF THIS PARAGRAPH, ADD THE FOLLOWING: In the case of scattered small commercially-zoned pockets of land in predominantly residential neighborhoods, efforts should be made to ensure that any new mixed -used or residential development is not inconsistent in density or style with existing nearby homes or buildings – especially in Historic Districts.	
ANC 5E07 Commissioner	Housing	Policy H-2.1.8/ New: Redevelopment of Affordable Housing/	As affordable housing reaches the end of its functional life, support the redevelopment of the site to the greatest extent feasible in line with the District’s goals and strategies regarding equity and inclusion. Redevelopment strategies should also always include consideration of the cost-effectiveness of major renovation of existing affordable housing buildings, including the addition of stories (i.e. increased density and height).	
ANC 5E07 Commissioner	Housing – H3	H-511.2: Home ownership and access	An important part of ownership is access to financing and real estate opportunity. In the past, the practice of “redlining” (e.g., withholding home loan funds in certain neighborhoods) by certain lenders made it	



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			more difficult to secure home loans in parts of the city. Enforcement of Fair Housing practices is important not only to stop unfair lending practices, but also to address affordable housing opportunities in high cost areas, discrimination against renters, single parents, persons with AIDS, and others with special needs. In this regard, consistent with <u>513 H-3.2 Housing Access</u>, the District needs to examine and clarify its policies and official actions that allow developers to construct a single building that functions as two buildings – one for market-rate units (predominantly white) and one for affordable senior housing units (in DC, typically predominantly black) – thereby promoting segregated housing in Washington, DC. For example, City officials should (in collaboration with HUD and fair housing officials), develop principles that do not allow, or at minimum, mitigate, the significant negative social-cultural and non-inclusive impacts of separated senior housing (with separate entrances, lobbies, HVAC and other systems, etc.) in predominantly market-rate residential buildings.	
ANC 5E07 Commissioner	Housing	Policy H-04.141.2.7/504.140: Density Bonuses for Affordable Housing [e.g PUDs]	Language in this section is very ambiguous. Please either DELETE or CLARIFY and PROVIDE SPECIFICITY related to the following: <ul style="list-style-type: none"> • <u>...density bonuses for affordable housing units that are above and beyond any underlying requirement. [what are these underlying requirements?]</u> • <u>...flexibility in development standards should be considered to minimize impacts on contributing features and the character of the neighborhood. [What are ‘development standards’ & provide examples; how is such ‘flexibility’ related to ‘contributing features and neighborhood character’?]</u> 	
ANC 5E07 Commissioner	Housing	NEW Policy H-1.2.9 Advancing Diversity and Equity of Planning Areas	The current Comprehensive Plan is a 20-year document that expires in 2025. This section includes affordable housing goals for 2050 (i.e., affordable housing should constitute 15% of housing in each Planning Area). All goals should be limited to 2025, and the stated affordable housing goals should be revised accordingly.	
ANC 5E07	Housing	NEW Action H-1.2.1:	Consistent with the goals that one-third of all new housing be reserved	



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Commissioner		Leveraging Inclusionary Zoning	for households at 30% - 80% AMI, Inclusionary Zoning affordable housing requirements should be increased to 15%- 20%, the banning of IZ in the downtown area should be revoked, and PUDs and other mechanisms associated with the granting of increased density over zoning limitations should require 25% to 30% affordable housing.
ANC 5E07 Commissioner	Housing	505.7 Policy H-1.3.2: Tenure Diversity and 504.16 Figure 5.23: Targeted Distribution of New Affordable Units by Income Group 504.16	Consistent with its xx/xx Resolution titled “The DC Comprehensive Plan and Affordable Housing”, ANC 5E strongly supports affordable housing targets as noted in Figure 5.23: 40% for households below 30% AMI, 30% for household at 30% - 60% AMI and 30% for households at 60% - 80% AMI. We also reiterate the need for no less than 25-30% of all affordable housing be reserved for families requiring 3 to 4 bedrooms.
ANC 5E07 Commissioner	Housing	Action H-1.4.C/506.15: DCHA Improvements	At the end of this section, ADD: As an incentive to homeowners to accept housing vouchers for rental of basement and accessory apartments, etc. in those residential neighborhoods with high cost rent or rapidly increasing rental rates, provide vouchers that are at least 10% higher in value than the median rentals for a unit of similar size and condition in the targeted neighborhoods.
Aaron Sessions	Mid-City	2003.1	COMMENT Unclear why the percentage of population is the same in 2000 and 2017 (14%)
Aaron Sessions ANC 5E09 Commissioner	Mid-City	2000.8	Some Mid-City neighborhoods still struggle with violent crime, homelessness, drug abuse, vagrancy, and blight. Despite the real estate boom, buildings continue to lie vacant along commercial corridors such as lower Georgia Avenue, Florida Avenue, and North Capitol Street. The area also has a severe shortage of parkland. As the densest part of the city, and one with many young children, recreational needs are among the highest in the city. Most of the area’s parks lack the land and amenities to meet these needs. **START ADD** Thoughtful redevelopment of the McMillan Sand Filtration Site can help meet the areas deficits of housing including its need for a grocery store,



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			community center, recreational open space along with Senior Living plus a small percentage of new and affordable housing units to be developed by year 2025. **END ADD*	
Aaron Sessions	Mid-City	2016.9	COMMENT Keep sentence that was removed regarding viewsheds and vistas. See Texas Capitol View Corridors as a reference for view corridor planning.	
Karla M. Lewis	Mid-City	MC-2.7.3	Policy: MC-2.7.3: Connecting Bloomingdale and Eckington Improve connectivity between Bloomingdale and Eckington by expanding the North Capitol overpass, decking over the entire expanse to create a tunnel between Seaton Place and Rhode Island Avenue and creating a green space to make crossing North Capitol Street more inviting for pedestrians and other persons using non-motor vehicles.	
ANC 5E09 Commissioner	Planning & Dev Priorities	2407	Opposed to redlining of the PLANNING AND DEVELOPMENT PRIORITIES - The Planning and Development Priorities sections have been deleted in all the Area Elements and should be restored (Sections 1507, 1607, 1707, 1807, 1907, 2007, 2107, 2207, 2307, and 2407). These were originally developed with extensive community consultation and for the most part remain as relevant today as when they were articulated. They are important expressions of planning direction. Without similar intensive area-by-area consultation they should not be removed. The engagement activities conducted by the Office of Planning as described in the amended Introduction are woefully inadequate to inform and gauge the land use concerns and goals of residents and businesses, and are a stark contrast to the intensive and meaningful consultation undertaken in preparing the current Comprehensive Plan.	