

## MEMORANDUM

**Date:** September 10, 2021

**To:** Eric Leshinsky, Chief of Comprehensive Planning

**CC:** Dr. Sally Nash, Director, Office of Planning and Zoning  
Eric Borchers, Comprehensive Planning, Office of Planning and Zoning  
Alderspersons Ross Arnett (Ward 8) and Rhonda Pindell-Charles (Ward 3)

**From:** Peter Bittner and by proxy for the Annapolis Citizens' Coalition (Bay Ridge Community Association, Eastport Civic Association, Hillsmere Community Association, Greater Parole Community Association)

**Reference:** Annapolis Ahead – Framework for 2021 Comprehensive Plan

Members of the Citizens' Coalition (identified above) have carefully reviewed the goals, metrics and actions proposed in the Annapolis Ahead framework document (the Plan). The attached document provides detailed suggestions and edits on the chapters for Municipal Growth, Land Use, Housing, Transportation, Environmental Sustainability and Water Resources sections of the Plan. As you will see, it is a lengthy compilation of comments, largely as a result of the occasionally random organization of the material, lack of definitions and supporting data, assumption references, and the exhaustive number of goals.

Beyond the specific comments in the attachment, a series of over-arching themes were discussed by the Coalition and are itemized below. The intent is to provide observations about the Plan's fundamental assumptions and highlight several key issues. The Coalition appreciates the engagement you have had with us to date and looks forward to a continued dialogue in the coming weeks. We understand the iterative process of the Plan's development and remain committed to offering subsequent input through the Plan's finalization. We look forward to discussing this round of comments with you at your convenience.

### *Assumptions and Key Issues*

Municipal growth, and land use and housing. These chapters are written based on an assumption of adequately sized public facilities and infrastructure. We believe this is inadvertently misleading and in some cases simply not accurate. The Plan must recognize inadequacies in the locations where they exist and bring infrastructure and services up to the standards required. Also, there is no mention of the public safety issues in some locations before reinvestment in vacant or underutilized parcels will occur. The public safety issue also relates to the City's ability to retain and attract new businesses.

Affordable housing is a major thrust of Annapolis Ahead. Land use changes such as more mixed use and 2,3 and 4 plex residential dwellings are a key part of enabling more affordable housing. However, the consequences of increased density and funding for associated infrastructure

expansions are not yet clear. We suggest these issues be thoroughly studied, tracked, and graded for each of the four case studies to provide the necessary parameters required of subsequent increased density/land use changes. The communities in the four case study areas must be involved in the discussions and decision making throughout the process.

Furthermore, as a result of the increased density goals, it would be useful to address infrastructure additional to transportation/mobility. The discussion (maybe a separate chapter) would address the aging water, sewer, gas lines and communications (overhead lines) infrastructure, as well as identify and incorporate the County and State goals and proposed actions. The Plan should highlight the need for frequent and ongoing collaboration to plan, fund and implement the priorities among the three jurisdictions as well as with the private sector providers.

Transportation. Several items drive our detailed observations about this chapter. The recommendations made by the Forest Drive Sector Study should be acted upon. The assumptions behind the goal of shifting mobility investment to public transit and micro-mobility/ride-sharing is questionable and should be examined more thoroughly. It is questionable because of the large number of residents who live in Annapolis but work elsewhere. They will likely continue to require automobiles to reach their places of employment because public transportation cannot effectively provide services to the many different locations of their employers.

Resilience Planning. When the City conducted a public survey over a year ago, over 700 citizens responded and listed a resilience plan as a top area of concern. Resilience planning, design, funding and implementation by its nature requires an extended period of time. Consider the many years it took to finalize the City Dock plan. Additionally, the longer planning and implementation takes, the greater the costs for adaptive and mitigation measures.

The Deputy Manager for Sustainability and Resilience is responsible for development of this plan, which was originally estimated to be ready by the end of the summer of 2021. Covid no doubt impacted this schedule. An additional factor may be that the Deputy Manager's additional responsibilities have taken far more time than anticipated. The City should consider adding new staff or assign other staff members or outside resources to support the critical and time sensitive work of resiliency planning.

We believe that the increasing negative and destructive impacts of climate change continue to increase at a much greater pace than in the recent years. The Resiliency Plan should have a very high priority and be a key component of or stand-alone chapter of Annapolis Ahead.

Public safety. This is referred to under Guiding Principles, Functional City: Public Realm Designed for Safety and Comfort. However, the reference seems to relate to safety in the mobility context. The City obviously needs to have a strategy to address gun violence and then take the necessary immediate and longer-term actions. This may be underway; if so, it should be made clear. The principal of a thriving city cannot be accomplished without attention to public safety. We suggest that a goal with metrics and actions be established for this topic.

Plan implementation and accountability. Additional to the metrics established for all the goals, we suggest that measures of compliance and accountability be established for all chapters. We believe this is necessary because many of the goals and associated actions will not be the single responsibility of any one department. Buy-in from all City departments will be required. We are concerned that the existing staff may not understand the goals and that procedures are insufficient coordinate across Departments. A true team effort across departments and down to all levels is an essential for implementation. That team effort also needs to include collaboration with County and State partners. Effective implantation requires that City departments be held accountable for the enforcement aspect of their work, as well as for results. Finally, with oversight from the City, property owners must be held accountable for meeting the requirements of the City Code.

Definition of terms. A glossary of terminology is needed so that all City officials, departments, commissions, task forces and the public understand the meaning of what unintentionally obscure or unclear terminology.

Paying for Annapolis Ahead. Several items merit attention:

- Fiscal impact. The impact of growth (costs and benefits) is subject to a separate fiscal impact study. We understand an earlier draft is to be updated, but have not yet seen the revisions. The plan assumes growth is necessary and is good for residents. This assumption has not yet been proven.
- Fiscal soundness. The City's long term structural challenges have long been talked about, but few actions have been taken to address them. In the FY2022 budget discussions, the Council agreed to undertake a survey of residents' service preferences/priorities. The fiscal aspects of the Annapolis Ahead plan should be one of the guiding principles under Thriving City.
- Sufficiency of the operating and capital improvement budgets. The City historically has not had sufficient funds to pay for the costs of the all the proposed actions. There is a need for partnerships with the county, state, non-profit organizations, etc. These partnership are acknowledged in some chapters, but more emphasis could usefully be placed on partnerships as an underlying theme (or operating principal) for all the chapters. Such partnerships will also bring other resources, such as technical expertise and lessons learned from relevant experiences elsewhere.

# Citizen's Coalition Observations on Annapolis Ahead Framework September 10, 2021

## Introduction

The Coalition's observations are provided in the material below for the chapters on Municipal Growth, Land Use, Housing, Transportation, Environmental Sustainability and Water Resources. The goals, metrics and actions are in black font, followed by comments in green. The chapters on Transportation and Environmental Sustainability also contain introductory and conclusionary statements in black italicized font.

## Municipal Growth

**MG 1:** Grow in a way that assures public facilities and infrastructure remain adequately sized and equipped to deliver exceptional service to existing residents, institutions and businesses. The word "remain" in the first line should be deleted. The narrative preceding this goal statement must acknowledge that in some locations around the City the existing facilities and infrastructure are not currently adequately sized, maintenance is lacking and the safety of pedestrians and bikers has not been adequately addressed. These areas should be clearly identified and named.

Further, it is not clear whether police and emergency services (as distinct from hard infrastructure) are covered by the goal statement. The police department is currently under staffed. Meeting and enforcing the requirements of the APF Ordinance should be a key part of this goal. Future growth can then be structured in a way that ensures existing infrastructure shortfalls are being addressed in context with the permitting of new infrastructure proposals.

**Metrics:** The levels of service documented in the fiscal impact studies supporting this CP are not reduced over time, but instead are kept the same or improved.

The previous fiscal impact study did not specify or quantify levels of service. The study was focused more on whether or how much additional monies might be required to maintain current services in an aggregate, not at the actual service level. Clarification is needed for this metric to be useful.

### Actions:

1. Implement a revised APFO especially for parks. Why the special emphasis on parks? All the APF topics merit attention.
- 2.No comments
- 3.No comments
- 4.The City will extend no facilities or services to any property without annexation. However, on a case by case basis, the City may consider a pre-annexation agreement – a contract requiring the owner to annex when the City is ready to do so.

**MG 2:** Within the designed growth area – which is defined as the area outside the City boundary which meets guidelines for the State's Priority Funding Areas and is therefore deemed sensible

for annexation – promote exceptional development that addresses the City’s planning goals and, in particular, contributes to the creation of good paying jobs and fiscal strength of the City.

The Plan should include projections on how much land the city anticipates annexing during the period of the plan, and also indicate the locations and numbers of individual properties/housing units that are projected to be built.

Metrics:

- Each annexation by the City will be found to make a net positive fiscal impact. How is “net positive impact” determined and analyzed? What criteria will be used? Is there an agreed upon methodology to be used? Who actually does the analysis and who pays for the cost of the analysis?

Actions:

No comments on 1 and 2.

3. Conduct fiscal studies of each proposed annexation. Who pays for the studies? Who reviews the studies? A multi-jurisdictional review is important.

**MG 3:** Growth in the number of households will prioritize increasing workforce and affordable housing.

This is a cumbersome goal statement. The City cannot control the type of growth that developers are interested in, short of denying permit requests. It can incentive it. Household growth in the City will come when there are jobs and more housing options. The City does not own most of the land, it can only adjust the zoning, subject to code and owners’ concurrence. Another reasonable objective is to prioritize growth, at least in some areas, that would result in the highest fiscal return for the City. This type of growth could aid in paying for services elsewhere. A definition of workforce housing vs affordable housing would be useful, including a statement about income levels to be targeted for each type.

This goal statement implies that the types of jobs envisioned in the Plan will only attract individuals that require “affordable” housing. While it is certainly true that some jobs will be low and minimum wage, this is not always the case. The Plan should be more clear in this regard.

Metrics: The affordable housing performance measures included in the Housing element will be achieved.

Performance measures for workforce housing also be included.

Actions:

1. Require a conceptual development plan and firm commitments to delivering affordable housing as a condition of annexation. Please clarify if this going to be a condition for every annexation? Or, does the Plan anticipate that every annexation will include housing?

2. Study and adopt strategic updates to the zoning code that can incentivize housing for households making 80-120% of the area median income. Cross reference with the section on housing.

3.Utilize zoning district changes to identify “housing priority” areas where access to transit, jobs and amenities are already available. **How is access to transit, jobs and amenities to be determined? Please indicate the criteria to be used.**

4.Remove barriers in the zoning code to create additional workforce housing options, such as duplexes, triplexes and fourplexes – in places where they are compatible with adjacent communities. **Suggest this action also include the criteria to be used to determine compatibility.**

5.Add action #5 that describes what the City will do on an ongoing basis to assure that housing remains affordable for an extended period.

**MG 4:** Prioritize revitalization and redevelopment that best connects residents to retail, services and amenities. **Suggest change to “Encourage and incentivize revitalization and redevelopment that connects residents to retail, service amenities and natural resources.”**

**Metrics:** The percent of land area in the City zoned for mixed use increases from 8% to 20% by 2030. **Please explain the basis for 20%. The increase is significant. Is it realistic? Too much? What will be the environmental sustainability impacts on this growth?**

**Actions:**

No comments on actions 1, 3 and 4.

2.Provide enhanced technical assistance from City staff where renewed retail and housing opportunities will contribute to the quality of life for the City, such as in the Arts and Entertainment District. **Technical assistance for what purpose and to whom? What does “enhanced” mean?**

The MG4 goal and associated actions sounds like what should be a blueprint or business plan for redevelopment. Perhaps this is what the case studies will accomplish. See related observations below in the Land Use chapter.

## **Land Use**

### ***Overall comments for this Chapter:***

- An action under Municipal Growth goal #4 is to update the zoning ordinance. This land use chapter (esp. LU 1) suggests mixed use place type (or form based) zoning should be adopted. Whether under the MG or LU chapters, it would be useful to discuss the process for how a place type or form based zoning approach would be undertaken; e.g. based on the case studies?; in several wards to before rolling out to the entire city? How exactly? We also suggest explaining how form based zoning will take the APF ordinance into consideration. In brief, describe where the city is heading with potential zoning changes.
- There is redundancy with some of the goals. We suggest that as an organizing principal the material be rewritten in terms of a blueprint or business plan for redevelopment. (Maybe this is what is envisioned by referencing small area plans.) Such a blueprint would be framed as a collaborate effort including the current land/property owners, the

city, the state and county (as appropriate) and potential new investors/developers. The Comp Plan would describe what the city would do to attract redevelopment capital (private investors) as well as pull in necessary state and county money to supplement city funds for infrastructure.

- A Blueprint should include maps of the City identifying areas of proposed zoning changes and detailed codification of each new zoning classification created therein. Further mapping to be included can identify under-utilized properties, each parcel being prioritized based on redevelopment goals stated in the Comp Plan.
- The City and its residents would benefit from adopting a community benefits agreement of the type proposed by the Citizens Coalition.
- Prior to changing the land use code and in cooperation with ward residents, the City needs to make a determination that services and infrastructure conditions meet necessary standards. If they are not met, improvements should be made prior to changing zoning provisions.

**LU 1:** Simplify the zoning code so that it is easier to develop infill projects that complement the neighborhoods and creek sheds where they are located.

Metrics:

- New zoning standards adopted for new set of mixed-use place types, which help to consolidate and simplify the zoning districts
- By 2030 small area plans have been prepared for the City's creek watershed areas that coordinate land use with environmental goals.  
Suggest specify how many small area plans and by when prior to 2030; i.e. so that priority locations (however those are determined) are targeted first.

Actions:

No comments on Actions 1 and 4.

2.Prepare small area plans for each of the City's creek watershed areas that coordinate land use with environmental goals to support continued improvement of the City's waterways and a model for sensible infill development.

*Prior to preparing small area plans, the City should develop a template that is reviewed and approved; and then used as each small area plan is formulated.*

*Do not understand why "sensible infill development" is mentioned. Watershed plans cover land uses in the watershed; the specific type of development should be left to plan design efforts.*

3.Create illustrations of generally acceptable building design principles for each of the Development Types identified in this chapter and use as model for the character of new construction that it expected. Who "creates" these models-- the City? This would be an action step where the City creates and provides incentives for "green" design, low impact design and use of energy conservation, and use of recycled materials.

**LU 2:** Promote the improvement and re-investment in vacant or underutilized parcels. Suggest that the plan details identify these parcels using maps.

Metrics: By 2040 the aggregate assessed value of property designated as vacant or underutilized will have increased at a rate at least twice that of the City’s overall assessable base.

*2040 is a long ways off. Suggest 3 or 5 year metrics, starting from the year the CP is approved and continuing through 2040. What factors will be used to determine if a property is underutilized? We understand the City is eyeing several locations along Forest Drive for up-zoning based on the determination that the properties are underutilized.*

Actions: These are difficult to comment on because we do not yet have the “redevelopment priority framework” to be provided in this chapter.

**LU 3:** Identify zoning language adjustments to the residential districts that will help to bring about more housing options for workforce and middle income residents.

*Are middle income residents considered those looking for affordable housing?*

Metrics:

- The number of housing units per acre will increase commensurate with the quality of community design and provided public services and facilities are available.  
*The metric cannot be quantified. Thus, it will be difficult to determine an outcome.*
- The share of total housing units in Annapolis housing types with two, three and four. Units will grow from 6% to 15% by 2030 and to 25% by 2040.

Actions:

*See previous comment about need for a community benefits agreement*

**LU 4:** Support and sustain the expansion of businesses and private sector employment and the revitalization of the tourism sector (including restaurants and retail) which have been adversely impacted by the pandemic.

*This goal and the actions seem more suited to an economic development strategy/plan. No land use changes are suggested, apart from what may occur from legislation related to the recommendations of the Maritime Task Force. Perhaps only that aspect of land use needs to be addressed in this goal.*

Metrics:

- Between 2020 and 2040 the number of jobs within the City’s light industrial sector will increase.  
*By how much are jobs projected to increase? Is there a basis from recent history to suggest an increase will occur? Recommend including 3-5 year targets*
- By 2025 the restaurant and tourism sector will have surpassed its economic productivity levels recorded at the beginning of 2019, before the shut-downs related to the pandemic.  
*Suggest including specific metrics such as employment, gross sales, taxes paid, etc.*

Actions: *Actions 2 and 5 related to economic development efforts are nearly identical and might be consolidated into one action.*

**LU 5:** Protect and secure the historic resource values of downtown Annapolis while promoting both its economic vitality and its role as the central civic gathering place for the City’s residents.



This goal covers historic preservation, environmental sustainability/resiliency and economic performance. The metrics and associated actions could be usefully organized using these three distinct topics.

Metrics:

- The estimated number...remain at or exceed....through 2040
- The square footage...through 2040
- Between 2020 and 2040, the population of full-time residents within the Historic District will increase.

Suggest have 3 or 5 year targets for all metrics. Also, it's not clear what the full-time resident statement is aimed at. Could the same statement be useful in other wards? Is this an obtuse way of aiming at fewer short term rentals? How will number of full time residents increase? Seems like all that will be left by 2040 is short term rental properties and small apartment units above retail.

Actions: No comments

**LU 6:** Link the city together with a network formed by the city's remaining natural areas, improved open spaces, parks and institutional areas.–This is redundant with goals and actions in other sections. Adds little to the plan; recommend delete. Metrics could be moved to section on Greenways.

Metrics:

- Update the Greenway Map annually  
This is an action, not a metric
- Establish at least one contiguous greenway within each of the city's creek watersheds by 2030.  
Suggest have 3 or 5 year targets

Actions: The actions should be in line with or could be covered by the environmental sustainability and water resources chapters.

## Housing

**H1:** Produce a supply of affordable rental and ownership housing in order to meet current and projected needs. Suggest change goal to “Produce a supply of lower cost rental and ownership housing to address current and projected needs.”

Clarify what is meant by projected needs by providing data and metrics on the number of housing cost burdened households, which comprise a wide range of income levels. Since the income levels vary, the supply may not only be at the lowest “affordable” level. Therefore, it would be helpful to describe the supply as “lower cost”. Also, since it is highly unlikely the supply produced will fully meet projected needs, the goal should clarify the purpose of the goal is to address the need. Define “affordable”.

Metrics:

- The percent of total renter households that are “severely cost burdened” is reduced to

10% by 2040. Reduced from what percentage? To provide better context it would be helpful to clarify the percentage to be reduced and corresponding number of units and how you determined the targeted decrease. Specify the factors that will cause the severely cost burdened renters to decrease; e.g. actions to be taken and by whom.

- The percent of total home-owner households that are “severely cost burdened” by 2040 is reduced to 6.5%. Same as above.

Actions:

1. Coordinate with Anne Arundel County and the State of Maryland to encourage the development of affordable and moderately priced rental and owner-occupied housing within the greater Annapolis area. No Comment
2. Promote infill development and redevelopment in the Upper West Street corridor to increase the supply of housing, and rental units in particular, that complements and enhances the existing Parole community. (also listed in the Land Use element under goal LU 1). Why restrict infill development to Upper West Street/Parole, shouldn't this goal pertain City wide?
3. Use the City's authority to annex and permit development to promote housing development in the City's 82.6-acre Growth Area, which is defined as the area outside of the City boundary which meets the guidelines for the State's Priority Funding Areas and is therefore deemed sensible for annexation. Would be helpful to provide a location of these areas and expand upon the criteria and process for annexation. Can areas be prioritized regarding potential annexation?
4. Reevaluate the Moderately Priced Dwelling Unit (MPDU) program and consider its practicality; explore opportunities to expand the requirement for MPDU's within planned developments. Provide more detail about what is meant here, is it to increase the percentage of required units in Planned Development?
5. Revise the R3 and R4 Districts and increase the allowable housing unit density to standards that are more compatible with the urban center Annapolis has become. The use of the term “urban center” denotes high rises incompatible with Annapolis. Therefore, it would be helpful to provide some clarifying language, perhaps refer to the use of form-based code to ensure compatibility with surrounding neighborhood features.
6. Explore the feasibility of permitting multi-family dwelling units in all zoning districts where they are currently only allowed by special exception. Based on previous conversations, I believe this action item does not apply. Please confirm whether you intend to keep this metric and if so, how it comports with the current Annapolis code.

**H 2:** Preserve the supply of quality housing for low and moderate-income households.

Metrics:

- Over the next 20 years, achieve no net loss in the supply of housing meeting the needs of low and moderate-income households. No Comment

Actions:

1. Formalize a policy of no net loss in quality affordable units to be managed by the Community Development division of the City's Planning & Zoning Department. No Comment
2. Mitigate displacement of low- and moderate-income households by facilitating strategies

aimed at reducing the costs of maintenance and property taxes. Please clarify, how the City would be able to reduce maintenance costs. Presumably, reduction of property taxes would be achieved through PILOT (payment in lieu of taxes).

3. Maintain and regularly update a map of naturally-occurring affordable housing (NOAH) in the greater Annapolis area and develop triggers and criteria for preservation actions. No Comment.

4. Give greater preference at the highest level of City staff, in time and resources, to working closely with residents in low and moderate income neighborhoods who may not be formally organized to advance their interests, especially where owner occupied housing is generally affordable. Why would this effort be aimed only at owner occupied housing? And please expand upon how resident interests would be advanced.

**H 3:** Plan for changing housing needs over time in relation to both the production of new housing and preservation of existing units. No Comment

Metrics:

- The formation of an effective system for biannually reporting on the status of housing affordability and routinely offering expert recommendations to the Mayor and City Council for improvement. No Comment

Actions:

1. Formalize a system of regular monitoring and reporting on the production and preservation of affordable housing units. No Comment
2. On an ongoing basis, postulate and test zoning changes related to density and unit types and select and adopt zoning amendments that reduce regulatory barriers to the production of affordable housing units. No Comment
3. Formalize a policy of regular coordinated reporting with Anne Arundel County on the production and preservation of affordable housing units in the greater Annapolis area. No Comment

**H 4:** Increase the supply and diversity of housing types and the locations where such housing can be compatibly provided to best facilitate housing that addresses the particular needs of the city's households by, for example, age, income, disability, and household size.

Metrics: No Comment

- The percent of housing units in housing types with two, three and four units will grow from 6% to 15% of the total by 2030, and to 25% by 2040. What are the number of units the percentages represent and how did you determine the targeted increase?

Actions:

1. No Comment
2. Amend the zoning ordinance to provide that one accessory dwelling unit be allowed by right on all single-family lots in all zoning districts subject to a certain lot size, to be determined, and subject to the provisions of paragraph 3.
3. Before the City considers allowance for additional Accessory Dwelling Units, first, determine the number of existing accessory dwelling units currently within the City, then draft legislation

that allows these units to meet standards and incentivizes any additional accessory dwelling units that meet neighborhood compatibility standards.

4. Foster new opportunities for mixed income and mixed-use communities including through the redevelopment of the Eastport Terrace and Harbor House communities, and potentially other properties currently owned and managed by the Housing Authority of the City of Annapolis (HACA). **No Comment**

## **Transportation**

In this chapter we include introductory and conclusionary statements, as we have concerns that the draft framework document may be ignoring or not yet addressing significant facts.

### **Introduction/background**

*Anne Arundel County's 20 Year Comprehensive Plan, Plan 2040, was approved by the County Executive in April 2021. It followed a comprehensive area planning review which did not include the City of Annapolis but everything around it, including Forest Drive. the most dangerous roadway in the County for accidents and fatalities with five failing intersections continually challenged by increasing development in the City and County which must be mitigated as part of a joint strategy to make Forest Drive safe.*

*The final report recommended amendments to the County's Plan 2040. Fifteen amendments based on its recommendations were submitted to the County Administration and County Council, but the Council only approved 5 and left the balance to the City, stating they were the City's responsibility. The City should with the County, adopt and implement these recommendations.*

*There are 10,500 people living along Forest Drive. Thousands of children travel to school along Forest Drive daily. Forest Drive has over 40,000 vehicle transits per day. Residents of five wards (3, 4, 6, 7 and 8) regularly use Forest. There is no direct access road across the City from North to South and South to North, even though it was addressed in the 2009 Comprehensive Plan. The result is significant traffic backlogs on Chinquapin Round Rd and its intersection with Forest and Aris T. Allen.*

*Annapolis's employment is based on small business, the maritime industry, state and local government and the Naval Academy, but thousands of Annapolitans commute daily to the National Security Agency, the Pentagon and Washington DC area as well as Baltimore. This will not change, but only increase, as NSA and other federal agencies' and private sector employment growth continues to increase in this area.*

*A high percentage of unemployed/underemployed, elderly citizens and those living below the poverty line would benefit from public transport, but significant challenges still carry over from recommendations in the 2009 Comprehensive Plan that have not yet been implemented.*

*Bicycles and bus routes are not feasible for travel to many areas. Working hours at many locations are not nine-to-five jobs. Multi-modal transportation strategies work with stable work schedules do not work well for many military and civilian public servants who work in these*

*areas. Annapolis's roads are very narrow, parking is scarce, the culture is based on automobiles and the climate year-round does not favor bicycle transportation. Drivers tailgate and speed, which further threatens those commuting on a bicycle or walking for recreation. There is little or no police enforcement of these infractions.*

### **Comments on the Goals, Metrics and Actions:**

The chapter's focus is to improve how those who live and work here get around the city. It advocates, as a best strategy, improving alternative mobility options to "ensure those who wish to walk, bike, or use public transit can do so safely and comfortably, and to encourage more people to consider these options." **Considering the background above, is this a realistic goal? What data about Annapolis's demographics, employment and traffic patterns do you have that supports this goal?**

**T4:** Expanding partnerships with key public and private stakeholders and citizens to improve mobility, safety, and connectivity for residents and visitors alike.  
**This goal should be become T1—the highest priority.**

**Metrics:** Maintain current schedule of quarterly meetings with AA County Transportation staff and SHA staff. **Detailed planning and implementation meetings need to be monthly, not quarterly. Without this level of detailed planning, the other goals won't be achieved. The other metrics are appropriate.**

**Actions:** **We agree with all, with the stipulation that coordination meetings should be monthly.**

**Current T1:** Shift the mobility investments toward public transit, micro-mobility/ride-sharing, active modes, and support for telework option to double the usage of these modes by 2040.  
**This could become T2, T3 or T4.**

**The Transportation chapter's goal is to greatly increase alternate mobility, meaning increasing bicycle transportation around the city while doubling telework options by 2040. It does not seem realistic to assume a change in culture and employment where double the amount of people working from home and walk or bike for daily essential activities. What evidence suggests that his goal is achievable?**

**Annapolis needs to hire a Transportation Engineer and a staff to daily manage transportation issues within the City and Forest Drive with the County and State, and should have done so long ago, but especially for the 2022 budget. This is a recommendation for immediate action.**

**Monthly meetings with the State and County to resolve transportation issues need to begin now and continue, not quarterly meetings as the draft recommends. The City is fiscally challenged, tax rates are high and not either sustainable or able to be increased. Any progress on Annapolis's traffic challenges depends on funding from multiple resources, federal, state, County, and City.**

**Add three additional actions:**

- Develop multi-jurisdictional implementation plan for previously identified transit capacity improvements in the Forest Drive Corridor.
- Add a commuter transit bus line along the Forest Drive corridor (in the City’s Plan).
- Establish an intermodal transit center adjacent to the Annapolis Towne Center and in the Hillsmere/Bay Ridge Area (in the County’s Plan 2040).

**Current T2:** Build a policy environment in Annapolis that is mode-neutral, equitable, and oriented to safety. What evidence does the City have that a mode-neutral policy is realistic? Please define “mode neutral” with specifics. Define “equitable” as it pertains to transportation

Metrics: Crash rate. Reducing the crash rate to less than the rate of population increase by 2025 is incompatible with adopting a Vision Zero policy, which aims at zero deaths. This recommended in T2. Vision Zero, recommended and adopted by the County, needs to be implemented as soon as possible. Annapolis needs to safely increase its traffic flow throughout the City and integrate it with that of Forest Drive. The purchase and installation of upgraded of IT systems for signal lights is a key element of addressing safety. There should also be a requirement for law enforcement to crack down on persistent speeding, tailgating, and aggressive driving.

**Current T3–** Transportation will take a leadership role in creating a greener and healthier Annapolis to sustain the economic, environmental, and societal quality of the City. Suggest revise the goal statement as follows: Create a greener and healthier Annapolis to sustain the economic, environmental and societal quality of the City. (Transportation itself cannot lead). Define societal quality, as well as how it will be measured. Also, it is not clear how transportation will contribute to societal quality. Explain how EV charging stations sustain societal quality.

Metrics: Expand the number of publicly accessible EV charging stations tenfold by 2025. How many are available currently? Can the tenfold increase be achieved without significant funding from the City and partners. BGE is mentioned, but federal, state and county funding will also likely be necessary, additional to the private partnership cited.

Actions: The actions to be taken in the transportation chapter can definitely play a role in a greener and healthier Annapolis. However, in order to achieve the goal, many actions have to be implemented in the near term. This is all the more reason for a transportation engineer to be hired in the next fiscal year.

**Conclusion: Special Attention Required**

*It is not clear whether the Transportation chapter is sufficiently focused on the geographical area encompassing roads and intersections, including: West Street and Admiral Drive, Chinquapin Round Road and Fairfax Road, and Chinquapin, Aris T Allen and Forest Drive.*

*State and county traffic data clearly indicates that the intersection of Forest Drive, Chinquapin Round Road and Aris Allen Boulevard/MD 665 is one of the most traveled intersections on the Southwest boundary of the City. Traffic at this intersection is compounded by West St and*

*Chinquapin Round Road traffic which feeds the Admiral Drive and West St. intersection. Recent traffic studies indicate that more than 16,000 vehicles travel on Chinquapin Round Road daily.*

*Tremendous delays in traffic are experienced daily between the hours of 2:00 – 7:00 P.M., Monday thru Friday, at the intersection of Forest Drive, Chinquapin Round Road and Aris T. Allen.*

*Improvements to this intersection in the City of Annapolis and AA County should be conducted in accordance with the recommendations of the AA County Parole Mobility Study and the Forest Drive Sector Study.*

*We recommend that a comprehensive traffic study be performed to ensure that the most appropriate design methods are selected, with the capability of reducing traffic congestion at this intersection. The inclusion of a bike and walking trail should be a requirement for the design and construction of all roadway upgrades and improvements in the Forest Drive, Chinquapin Round Road and Aris T. Allen area. This study should also evaluate the best design required to modernize and improve the intersection of Fairfax Road and Forest Drive - the only ingress and egresses to the Fairfax Community.*

*Consideration of proposed developments on the North side of MD 665 (Godspeed Way) and an Annapolis approved development on the South side of MD 665 (Rocky Gorge), must be included in all roadway upgrades and construction efforts in this region. These developments are included in the pipeline of both in County and City. They will require ingress and egresses, approximately 100 feet west of the Chinquapin Round Road and Forest Drive intersection.*

## **Environmental Sustainability**

This chapter includes introductory comments before specific observations are provided on the goals, metrics and actions.

### **Introduction**

*The Environmental Sustainability chapter covers a wide range of issues impacting the City's environment from tree canopy to waste reduction. At the core of all issues is an attention to resilience, that is, the ability of the City and all residents to sustain and adapt to the environmental and social impacts of climate change.*

*Climate resilience planning, adaptation and mitigation are urgently needed in Annapolis. But it is not sufficient for our times and the increasing threats we face. The City must immediately and actively undertake actions to reduce fossil fuel use locally and participate in County, State and Federal initiatives. These actions must be incorporated into the Comprehensive Plan integrating a broad range of goals and tasks to reduce the cause of climate change-- the use of fossil fuels which cause global warming. In the housing chapter, goals should be set to incentivize building of low-energy housing and the use of recycled materials and more LEED buildings. New housing units should be located near transportation hubs. The City should assess its own properties and undertake steps to reduce fossil fuel use and adopt carbon neutral actions.*

*Transportation planning must incorporate commitment by the City to transition its fleet to electric power and encourage other transportation providers-- charter services, non-profits, schools and delivery vehicles to do the same. As an action in the Transportation chapter the City should examine to how best to address a phased-in approach to an electric fleet. The study should include the costs, benefits, time required, staffing and maintenance for such a transition. It may better to extend the life of an existing fleet, and move to the use of more environmentally favorable vehicles over time.*

*The impacts are increasing in frequency and magnitude rapidly and Annapolis is particularly vulnerable to them, which adds particular urgency to the many goals of this chapter.*

**ES 1:** Develop a comprehensive and equitable approach to resilience that is relevant to all Residents.

Metrics:

- Adoption of a Resilience Plan with annual updates on implementation.
- Participation by residents from all Wards in the development of the Resilience Plan.
- The CIP includes resilience-related projects in all Wards.

Actions:

1. For the purposes of ensuring equity in resilience investments, utilize the definition of Sensitive Area provided herein that includes not only natural resource areas of significant value but also areas deficient in ecological value. Based on this definition, a place with both high impervious coverage and lacking in tree canopy would be deemed a Sensitive Area. **Comment: This is not an action; it needs rewriting or use as introductory material.**

**Comment on Sensitive Areas: the City of Annapolis should comply with the definition of “Sensitive Area” as presented by the Maryland Department of Planning in its requirements for a Comprehensive Plan**

**<https://planning.maryland.gov/Pages/OurWork/compplans/requirements.aspx>.**

**At this point, the draft document does not include a section on a goal(s) for protection of Sensitive Areas from adverse effects of development. Ideally, these areas would be identified in the Plan and levels of existing threats and protections provided. Also, given the high priority for environmental sustainability and climate resilience, further assessment of adverse impacts of climate change are needed.**

2. Complete the City’s draft Resilience Plan and ensure that it includes an Equitable Resilience Framework. **Comment. Definition of the concept Equitable Resilience Framework necessary. This term is from MEA and provision of energy backup for low wealth and vulnerable communities. While important, such backup capacity should be available for the whole city, being sure the low wealth and vulnerable community are fully incorporated. The recent impact of the Hurricane Ida tornadoes on our area clearly demonstrate need for upgrading our grid and creation of micro-grid.**

3. Create a standard and strategy for “resilience hubs” based on the Maryland Energy Administration funding guidelines that can be implemented within the City’s most socially vulnerable communities.



Comment. See #2 above.

Comment. Many climate resilience plans, including the Boston model (used by P&Z) include: 1) extreme temperatures/heat; extreme precipitation/stormwater flooding; sea level rise/stormwater flooding; and; coastal storms/coastal and riverine flooding. NOAA reports there are two components to sea level rise: 1) the actual rise in water level; and 2) subsidence. A NOAA scientist determined that subsidence is the greater concern for our area. Therefore, it should be included in any metrics and action steps of the Comp Plan.

Given the vulnerability Annapolis to climate change, we suggest the City follow the lead of some planning done in other cities and add: 1) working with BG&E to add backup capacity for the electric grid; and 2) pandemic planning and capacity building, with assumption we will be experiencing more such health emergencies.

4. Utilize the creekshed small area plans recommended in the Land Use element as a means to identify specific opportunities for neighborhood-scale resilience investments.

*Comment. We are pleased City staff has incorporated recommendation for inclusion of subwatershed plans for four City creeks. Watershed plans cover both water impacts and land uses as they affect water quality. That said, we are not clear on what “neighborhood-scale resilience investments” include and why they are tied only to the creekshed small area plans goal.*

**ES 2:** Expand the City’s tree canopy particularly in communities most impacted by climate change. *Comment. Expansion should be for the whole city, as we are all impacted by climate change. Action steps should target existing “tree inequity”.*

Metrics:

- Increase the City’s tree canopy to 50% of its total land area by 2036 and ensure a net gain of at least 1% each year to meet this goal. *Comment: Solid, measurable metric statement. Requires monitoring and compliance measures to prevent previous failure to reach Urban Tree Canopy goal.*

Actions:

Comment on the entire actions list: It would be helpful to have it organized by timeline; i.e. first, second, etc. steps to be taken. Missing are steps on City capacity and financing. With no additional funds available from the City budget and only one person on staff to address resiliency how will all these action steps be implemented? Missing is outreach to major land owners such as USNA, the religious sector, businesses such as those with large parking lots. The City should work with the USNA to either redo the stadium parking lots with installation of trees and low impact development components or install solar panels over the parking area, as has been done at Maryland Environmental Services HQ.

1. Work with NOAA or other partners to conduct a citywide surface heat mapping that will augment existing data on heat islands based on impervious coverage and tree canopy.

2. Revise the City's tree mitigation policy to require a 5-year maintenance agreement rather than a perpetual easement to expand those areas where new canopy may be created.
3. Update the Street Tree Master Plan to include priority areas feasible for new tree planting in the public realm.
4. Initiate a pilot planting program for Minority-owned businesses based in the communities where the planting is targeted.
5. Develop soil amendment and watering guidelines for new street trees to enhance the survival rate of new street trees.
6. Initiate a community tree planting initiative in partnership with the Watershed Stewards Academy and modelled after the RePlant Anne Arundel program.
7. Create an online dashboard for tracking the City's tree canopy year by year to ensure the goal of 50% coverage is met by 2036.
8. Utilize fees collected through Critical Area mitigation to offset the costs of new tree planting initiatives elsewhere in the City.
9. Explore opportunities to plant trees on HACA properties and Anne Arundel County schools and libraries within the City limits for the purposes of meeting mitigation requirements and the general tree canopy goals. (Also listed under goal LU 6 in the Land Use element)
10. Work with Anne Arundel County to leverage the full capabilities of the newly created Resilience Authority to implement projects that not only protect the City from sea level rise and other climate change impacts but also improve ecological functions.

Comment on #10: There may not be leftover funds from the Resilience Authority available to underwrite tree planting. The State has passed a major funding bill for tree planting. The City should be laser focused on getting funds from this and potential federal Infrastructure monies.

**ES 3:** Reinforce vulnerable shoreline areas by addressing the root causes of soil erosion and natural landscape degradation. No comments on goal, metrics or actions.

**ES 4: Promote a coordinated approach to food access that ensures all residents have access to high quality foods, and particularly foods which are locally harvested.**

Comment: This goal, metrics and action steps belong in the Communities Facilities section of the Plan. not under sustainability.

Actions: No comments on Actions 1-4. Suggest adding an additional comment.

5. Institute regular testing of fish by the Maryland Department of Natural Resources Fisheries lab, to ensure fish from City creeks are safe for consumption.

**ES 5: Increase the City's biodiversity particularly in areas that currently have limited ecological value.**

Metrics: No comments

Actions:

1. Utilize the Environmental Enhancement areas identified in the Land Use element of this plan as a means of prioritizing new planting and restoration that can increase Biodiversity. **Suggest rewrite as follows:** Prioritize new planting and restoration work to increase biodiversity using the Environmental Enhancement areas identified in the Land Use element.

No comments on other actions.

## **ES 6: Adopt a comprehensive approach to minimizing the City's carbon footprint.**

Metric:

- Achieve carbon neutrality by 2050 and a 50% reduction by 2030. **What is the basis for these metrics? Does the City have data showing its carbon status in 2021? Do we know what it will cost to achieve the targets?**
- A city government greenhouse gas emissions inventory is completed by 2022, and a community greenhouse gas emissions inventory is completed by 2023. **Suggest change to: By 2022 complete the City's greenhouse gas emissions inventory and by 2023 complete a community greenhouse gas emissions inventory by 2023.**

Actions: No comments on actions 1-5 and 8. Suggest add a new #10.

6. Develop planting guidance for maximum carbon absorption in both public and private development projects. **Suggest change to Develop planting guidance for maximum carbon absorption for all public and private properties.**

7. Complete inventories of greenhouse gas emissions from both city government and community level sources **no later than 2023.**

9. Require all new City facilities to include solar power. **Suggest add: and maximize energy efficiency measures, use of "green" building materials, adoption of green maintenance practices, as well as conversion of maintenance equipment to electric options.**

**Add # 10. Obtain and use the EPA App which identifies solar applications and potential sites to promote expansion of solar installations.**

## **ES 7: Reduce the amount of waste reaching landfills through an expansion of existing and new programs.**

Metrics: Suggested changes below. The percentage change and date should be included

- The amount of solid waste by ton produced by the City decreases each year. **Suggest change to: Decrease amount of solid waste produced by the City by \_\_\_\_ % per year.**
- The City-managed composting facility is established. **Suggest change to: Establish a City-managed (and owned?) composting facility by 20\_\_?**

Actions: No comments on 1 and 2.

3. Regularly assess the performance of the City’s recycling program to identify and issue a report to the City Council. opportunities for improved performance, expansion, and educational messaging. *Suggest change to Biannually assess the performance...*”

4. Coordinate with Anne Arundel County on public outreach that promotes the County’s recycling centers that accept materials not recycled within the City.

*Suggest add # 5. By the end of 2022 determine whether the trash facility is releasing methane. If found, immediately develop an action plan and secure funding from federal sources for mitigation.*

## **WATER RESOURCES**

The Water Resources chapter complements the Environmental Sustainability chapter in addressing the City’s most valuable resource, its water. The City’s waterways are both an ecological and cultural asset that shape nearly all activity in the city in some way, and the city in turn impacts these waterways both positively and negatively. For this reason, the goals of this chapter are closely tied to the Land Use chapter as well.

**WR 1:** Reinforce an ethic of proactive watershed stewardship through all sectors of the city, including residents, businesses, and institutions.

### Metric:

- The number of residential and commercial properties utilizing the stormwater fee incentive policy is doubled by 2030. [ Rewrite: By 2030, double utilization of stormwater fee incentive fee by resident and commercial properties.]
- Legislation that eliminates single-use plastics within the city is adopted by City Council. *Suggest change to - Adopt legislation eliminating single-use plastics in Annapolis by 2023.*

### Actions:

1. Work with Green Vest and other stormwater project contractors to integrate community involvement, minority subcontracting, and other possible programs to broaden awareness of stormwater management within communities. *Suggest change to - When Green Vest and other contracts are renewed, the City will incorporate sections in the contract which integrate community engagement, minority subcontracting and public information requirements.*
6. Explore ways of better supporting, leveraging, and coordinating the work of watershed organizations in the Annapolis area that may include: changes to the functioning of the Waterways Cabinet; the establishment of a new organization that consolidates the efforts of multiple organizations; and a dedicated fund, among other strategies. *Suggest change to -Support reorganization of Watershed Cabinet; include business and institutional partners and integrate with the Conservation Board, Annapolis Environmental Commission and the Maritime Board.*

**WR 2:** Reduce the City’s volume of stormwater runoff, using a wide array of means to do so.

Metric:

- Meet the TMDL goal of 20% reduction based on the EPA’s Chesapeake Bay pollution Diet by 2023.

**WR 3:** Adopt a comprehensive approach toward watershed restoration that reinforces the both ecological and cultural value of Annapolis’ waterways.

Metrics:

- By 2040, all of the City’s major creeks will meet fishable and swimmable water quality testing standards, and by 2050 all of the City’s major creeks will be fishable and swimmable after a major rain event. (Additional language underscored)

Actions:

1. Prepare small area plans for each of the City’s creek watershed areas that coordinate land use with environmental goals to support both the continued improvement of the City’s waterways and a model for sensible infill development. (also listed in the Land Use element under goal LU 1). **Comment.** Inclusion of the phrase “...and a model for sensible infill development” does not make sense; delete this portion of the statement.

No comments on actions 2-4.

5. Expand on the water quality testing work of the Spa Creek Conservancy and other organizations by conducting more regular and comprehensive testing of all waterways in the city. **Comment.** The City of Annapolis cannot directly “expand” WQ testing by local non-profit organizations. It can support, collaborate with, or fund such testing. So, an appropriate action step is framed acknowledging this indirect role. As an example, the City has given the Chesapeake Bay Trust \$300,000 this year to underwrite grants that address storm water runoff. In future years, the City could choose to do a parallel process which targets water quality and expand the range of data collected.

6. Explore the feasibility of expanding and/or training the maintenance staff from the City’s Department of Recreation and Parks to maintain watershed restoration projects. **No comment.**

**Add new #7.** Draft legislative/code changes to ensure stringent controls over applications for new or replacement-build structures constructed on waterways so that they do not crowd out recreational uses or prevent public access where it currently exists.

**WR 4:** Provide high quality, safe drinking water to all customers

Metrics:

- Field data gathering strategies for input into the City’s water distribution system asset condition assessment model are fully implemented by 2023. [ Rewrite: By 2023, Implement field data gathering strategies for input into the City’s water distribution system asset condition assessment model.
- **Add:** By 2035 identify water distribution system replacement projects as informed by the updated condition assessment and consequence of failure models are completed by 2035.

Comment: There may be some sites in the City that have high levels of trihalomethanes (THM). If this is correct, mitigation plans and implementation should be undertaken.

Comment: If there any lead pipes in the City they should be replaced as soon as possible (this would be an action)

- In 2022, work with the Anne Arundel School District to ensure that all water fountains in the City have clean, lead-free drinking water and cooperate in on-going monitoring.

**WR 5:** Manage the City’s wastewater infrastructure proactively to mitigate instances of failure, backups, and overflows.

Metrics:

- Complete the baseline inspection of all City sewers per National Association of Sewer Service Companies (NASSCO) standards by 2032.
- Identified sewer replacement or relining projects as informed by the updated condition assessment and consequence of failure models are completed within 2 years of Identification.

Comment: As currently stated the metrics are action steps. New metrics are needed.

Actions: No comments on Actions 1-4. Suggest add #5. Explore options for filtration mechanisms to trap microplastics to limit their release into the Bay.

**Suggest two additional goals, with associated metrics and actions:**

**WR 6:** Reduce release of methane in the City’s landfill

**WR 7:** Expand water access to the City’s 4 creeks.