



November 1, 2018

To: Planning Commission
Annapolis, Maryland

Dear Chairman Waldman,

Members of the Annapolis Neck Peninsula Federation and the Eastport Civic Association, aware of the significance of Forest Drive/Eastport Sector Study for the future of our peninsula, have carefully studied the August 31, 2018 draft #4. We respectfully submit our comments to the Commission as you consider the study for approval at tonight's public hearing.

Please see attached.

Sincerely,

Anastasia Hopkinson
Vice President
Annapolis Neck Peninsula Federation



**Eastport Civic
Association**

November 1, 2018

re: Forest Drive/Eastport Sector Study
Planning Commission public hearing

Robert Waldman
Chairman
Planning Commission
Annapolis, Maryland

Dear Chairman Waldman,

Members of the Annapolis Neck Peninsula Federation and the Eastport Civic Association, aware of the significance of Forest Drive/Eastport Sector Study for the future of our peninsula, have carefully studied the August 31, 2018 draft #4. We respectfully submit our comments to the Commission as you consider the study for approval at tonight's public hearing.

This draft of the Sector Study responded to some of the observations raised by the community and Planning Commissioners. However, many of the same issues identified in the first draft remain.

We initially offer a summary listing of some of the key issues that need to be addressed as the Planning Commission reviews the study. We follow that summary with explanations of our concerns and some suggestions about various elements of the study that you may wish to focus on.

A summary of key issues with the Sector Study

- Lack of attention to citizens' concerns about traffic, as expressed in the survey
- Forecast of future growth (of population and traffic) that is not credible
- Portrayal of present traffic problems that is inconsistent with citizen experience and the offer of weak solutions
- Reliance on new legislation regarding roads that has not yet even been presented, much less discussed, in Council
- Solutions which lack financial realism
- Proposals for intense, dense residential development which are not related to any population or market forecast .

What's missing in the Study is a serious plan for how to obtain the money.

The Study struck us as laced with wishful thinking that road, bicycle and pedestrian pathway improvements will materialize. On the other hand, the study lacks plans to fund mobility improvements and makes hopeful assumptions about future citizen behavior. While we appreciate that no single plan can make up for past failures, we ask the Planning Commission to reject wishful thinking and request rigorous, responsible plans so that this Study does not become another dusty tome.

Improved mobility would be welcome by all. Yet, as taxpayers, we are aware that mobility costs money. The Study should provide a clear pathway or framework as to what steps must be taken to plan for and obtain the funding needed to achieve the mobility solutions described. Without such an approach, the study lacks credibility because other studies have made similar recommendations that have not been acted on.

A. Longstanding infrastructure improvements have not been addressed. The 2009 Comprehensive Plan recognized the need for infrastructure improvements, most of which have not been made. The study (pp 30-31) acknowledges this situation. The study points out that: "...key improvements proposed in the 2009 Plan have not yet been built."

A 2015 Forest Drive Corridor Analysis (p 3) states that under "Future Condition – Adequate Public Facilities Improvements... the improvements at the Forest Drive/Hillsmere/Bay Ridge Ave intersection will be provided by and assigned to an individual development..." To our knowledge no developer has been required to pay for improvements to that intersection.

It is irresponsible to make these statements and then continue pretending something will eventually happen and someone will pay. Who will pay? And when? What's the plan?

B. Will the County and State fund infrastructure? The Study states that while "... the State and County have made improvements in the corridor since 2009 ... the current plans and capital budgets do not identify this area as a priority for future road capacity improvements." We expressed our concern in our October 15, 2018 email to the Planning Commission, that the critical voices of Anne Arundel County and the State of Maryland regarding the Study's proposed infrastructure improvements have not yet been made available to the public.

The study should provide information about what communications (if any) the City has had about these issues with the County and State, and whether there is any possibility for the County and State to adjust their priorities. Until then, the Study is incomplete.

C. Reality check: mobility costs money. Section 3 of the study discusses goals and potential solutions, including numerous and some good solutions for vehicular, bike and pedestrian mobility (pp 42-45). However, many of the solutions cannot be achieved without funding. For example, one recommendation calls for "Work with the County and State to further improve the Fairfax Rd/Chinquapin Round/Bywater Rd segment." Yet the County previously indicated the sector area is not a priority. Many of the Study's proposals are gratuitous and not grounded in reality because they cannot be implemented.

D. Encouraging alternatives to driving require further study and more public investment. The Study found that between 2000 and 2015 there has been an increase in the number of workers that drive alone to work and a decrease in those that use public transit. Yet, the Study (Appendices, p C-46) forecasts a decline by 2030 in workers who drive alone and a slight increase in those that use public transit and a healthy increase in those who walk to work. This projection is based on "national trends, City goals, and both Plan and Sector Study recommended actions."

We do not understand the basis for these assumptions that workers in 2030 will alter their commuting mode. These changes will not occur without improved public transit options and bicycle and pedestrian pathways.

Additionally, the Study (Appendices, p C-50) indicates that commuter destinations have changed substantially from 2000 to 2015. Over those years

there was a 26.6% decline in the percentage of workers who both reside and work in the City. As of 2015 almost 80% of residents work outside the City and many are driving to locations further away from their homes in the City. There is no indication that this trend to commute outside of the City will change. In sum, more people are driving and more are driving to locations outside the City because that is where the higher paying jobs are located.

Taking public transit is not an option until there is reasonable service. Public transport requires substantial public investment and both coordination with and funding from other jurisdictions.

Realistic plans and budgets to improve public transit, not just for the sector but for the region, and increase its use should be a separate effort initiated by the City. We do not have confidence that public transit will be a reliable mode of transportation until plans and investments are made.

E. Need to plan and budget for mobility now. The implementation plan (pp E-1 to E-14) identifies several important actions related to planning and budgeting for roads, and improvements in public transit and pedestrian/bicycle access. All these efforts should begin immediately, that is they should be near-term actions, preferably in year one.

Also, the City's Finance Department should be an active participant in planning and executing these actions to improve mobility. Currently, the Study does not cite the Finance Department as having any responsibility.

Finally, and most importantly, before recommending any land use and zoning changes, the commission should have a plan and budgets for investments in and construction of vehicular, bicycle and pedestrian infrastructure.

F. Affordable workforce housing. A vibrant economy which creates more jobs is a theme of this study, as well as in the City's Economic Development Plan. Creating more jobs would be greatly facilitated if the City had more affordable housing, especially for teachers, police, fire and other community service workers. Affordable workforce housing would also aid in preserving a "jobs to worker balance", which is stated as one of the study's solutions.

Separate from this study and before the topic is addressed for this sector, a city-wide plan for affordable housing should be developed and then applied to this sector. Such planning could help guide efforts to increase affordable housing, e.g. incentives or grants for developers, regulatory relief on such matters as density, etc.

What does not belong in the Sector Study?

G. Proposals for new regulation. The study proposes new regulations of traffic standards in its proposals to amend the City's Transportation Adequate Public Facilities Ordinance analysis and to change the Traffic Impact Analysis Guidelines, proposing alternate means of traffic analysis, namely Critical Lane Volume capacity analysis. (Appendix D. Possible Modifications to Traffic APFO and Traffic Impact Analysis Guidelines.) These two proposals are significant legislative requests and discussion is needed to understand their consequences and to resolve differing points of view and interests.

Appendix D should contain an introductory statement indicating that these guidelines would apply to the entire City and thus will require a separate effort to obtain public feedback before review and approval by Planning Commission and the Council. The proposed changes should not be considered part of the Sector Study and any approval of the study will not constitute an approval of the guidelines.

Or, these regulatory proposals should be separated from this study, presented to City Council and resolved before the 2019 Comprehensive Plan.

H. Are Community Character Designations covert rezoning? The Sector Study's Community Character Designations initiates the rezoning process. The map is described as "the visual product of this planning process [which] will be informed by future rezoning under the upcoming comprehensive plan process." (Study Plan, p. 50). The map on page 52 dictates rezoning, not advises it. We feel that that the designations of Community Character and their relationships to current zoning classifications should be subject to a public review. That review should be separate from this study and completed before the 2019 Comprehensive Plan.

What is deficient in the Study's methodology?

I. Study did not respond to community feedback. The study ignores or fails to address the results of Community Survey #1. The survey asked, "What do you not like about the study area?". Respondents indicated, "Traffic when there was an accident" and "Traffic on a day-to-day basis." When asked, "What is the most important to focus on?", two of the top three items were transportation and environment.

J. The optimistic assessment that Forest Drive's current failure will to be overcome is based on very limited data. The study presents analysis of existing conditions and future improved conditions of Forest Drive's intersections and movements. The City's standard is that no intersection may have an LOS less than D. Yet, in the current existing conditions there is significant failure of many intersections and movements. Citizens experience these poor conditions regularly.

With improvements, the study forecasts that by 2030 there will only be one failed intersection in the PM and fewer failed movements in the AM but not the PM.

**Forest Drive
Intersections and Movements
at Peak Hours
which are Failing (LOS E) or Failed (LOS F)**

	11 Intersections		47 Movements	
	AM	PM	AM	PM
Existing Conditions (Appendix p. c10-c11)	5	3	10	9
Improved Conditions (Appendix p. c31-c32)	0	1	3	9

This forecast is based on limited data. It only considers the current pipeline of development with a minor adjustment.

"The City's baseline scenario future growth projections through 2030 are derived from a combination of ongoing changes in sector household sizes and construction and occupancy of current pipeline development. It considers anticipated build-out/occupancy of projects that are fully approved but not yet fully constructed as well as progress towards build out/occupancy on projects that are close to approval and that might reasonably be expected to be approved and begin occupancy during this time frame. It does not include projections of occupancy for any new projects for which applications have not been submitted or for projects that are still in the early stages of review. As a result it projects a future in which the share of growth derived from new development tapers off over time." (Appendix, p. c-4 - c-5)

The forecast does not consider any possible additional new development or redevelopment over the ten year forecast. So, obviously, with no additional, development growth "tapers off over time".

Were future traffic conditions based on analysis of the study's population or household forecasts, the outcome would similarly predict less failure on Forest Drive because those forecasts show a slowing of growth.

<i>Estimates of Annual Growth in the Sector</i>		
	2010 - 2020 (Plan p. 24)	2020 - 2030 (Appendix p. c-5)
Households	0.25%	0.17%
Population	0.55%	0.38%
Workers	1.67%	0.04%
Jobs	0.39%	0.13%

These forecasts of slowing growth are contrary to reason and experience and are not explained in the study. The City is developing a database for such estimates. It would be prudent to not rely on these predictions of growth or future traffic conditions until more is understood about the data.

K. Underestimated projects in the pipeline. The pipeline indicates that 1,261 units could be built in the sector study area. However, this pipeline of potential new developments does not include several neighborhoods adjacent to the study area, especially in Parole and off Admiral Cochran Drive. These nearby areas should be included in the traffic shed because there is significant new development (671 units) in those locations. Residents in these areas will travel into and out of the Forest Drive/Eastport corridor during the AM and PM rush/peak hours as they commute to/from work or shopping. The study underestimates the volume of new traffic because these Parole area projects are not included in current pipeline calculations. New traffic models that include these projects should be run.

L. No citizen advice on proposed "Community Character" changes to communities and increased density.

We feel the Planning Commission should carefully review Section 4 Community Character (p. 49-72). The proposed designations will aimed at encouraging individual property owners and developers to adjust their approach to

redevelopment. The Community Character assignments on the map on p. 52 needs discussion with citizens and communities before approving the map. The map seems to show significant increases in density and/or changes in communities. What will be the increase in population and on traffic on Forest Drive? The population, household and traffic forecasts offered by the Study do not match the increased density that is evident on the map. To fully understand the future envisioned by the study, it should project a “before and after” scenario, namely, before (i.e., current zoning) versus after possible changes are made.

In light of these many missing, inappropriate and deficient elements, we urge the Planning Commission to not accept the Forest Drive/Eastport Sector Study. While City staff has created helpful tools, (population data base, traffic modeling), concepts (Community Character) and goals (improved means of mobility, greenspace) we do not feel the assumptions, conclusions or methodologies of this Study warrant acceptance. We suggest that the Planning Commission defer approval and declare the study as a work in progress to be used as input for the 2019 Comprehensive Plan.

We look forward to continued discussions with you and members of the Planning Commission as well as the general public regarding the future of the Forest Drive corridor and Eastport.

Respectfully,

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