



October 30, 2018

RE: Comments on Forest Drive/Eastport Sector Study

Members of the Planning Commission,

As the body charged with making recommendations related to the protection and improvement of the city's natural resources, we write to offer feedback on the August 31, 2018 draft of the Forest Drive/Eastport Sector Study. We respectfully request that revisions be made to the draft before the study is considered complete, as we do not find that it adequately addresses environmental concerns caused by existing and planned development along the Forest Drive corridor.

Overall Comment

Stormwater management and tree canopy are critical to the environmental health of Annapolis – so much so that the city has established target goals for each. For stormwater, the city is required by law to contribute to the health of the Chesapeake Bay by establishing a Watershed Improvement Plan (WIP) to reduce sediment, nitrogen, and phosphorus. In addition, the city set a goal to reach 50 percent urban tree canopy by 2036. Protecting tree cover and reducing stormwater runoff go hand in hand to guard the health of the city's surrounding waterways, all of which are listed as impaired by the US Environmental Protection Agency.

The AEC finds it improbable, if not impossible, to implement the recommendations in the draft sector study while still achieving the goals above. Large sections of the plan appear to focus on increasing commercial development, such as dining and shopping, and making road improvements. These developments inevitably bring additional impervious surface and, in many cases, land clearing. Investments the city makes in stormwater management cannot keep up with the added runoff cause by additional development. The AEC finds these recommendations incongruous with the long-established environmental goals and the desire of city residents to enjoy clean water and green space.

Specific Recommendations to be Included in the Next Draft

1. Many of the solutions include coordinating with the County, the County Green Infrastructure Plan, and the Annapolis Conservancy Board. The AEC recommends that more specifics on *how* this coordination will happen and, more importantly, how such coordination will address the challenges identified in the study.

2. Engage the city's urban forester to map a specific plan to protect tree canopy within the sector area. Section 3.2.2. mentions planning for ample street tree canopy, but it is not clear how this will be achieved, nor how the city will prevent the loss of tree canopy from increased commercial development.

3. *3.4.1-3 Bike and Pedestrian Investments* – The plan indicates these as mid-term priorities but this is one of the few areas of the plan with several specifics. Several actionable infrastructure investments in this area are described in the plan and in the Bike Master Plan. The AEC believes that these should be moved up to a “near-term” solution. We support the supporting solutions listed in 3.4.4-7 but suggest that they all be moved to the near-term list.

4. *3.5.1 Create a Greenway Plan* – The AEC agrees that creating and implementing a Greenway plan is an important step for the city. The plan mentions several additional Greenway related items including solution 3.5.2 Incorporate local streets into the Greenway Network and 3.5.3 Plan for a Park-to-Park Greenway section. Our recommendation is that the plan includes all specific conservation and greenway action items as near-term solutions until a Greenway plan has been researched, written, and implemented.

5. *3.5.2. Incorporate local streets into the greenway network* – The AEC suggests that these specific streets be described in the plan and implemented as a near-term solution.

6. Also described in section 3.5.2 is *applying a green street design standard and to retrofit existing local streets as part of beautification and traffic calming projects.* – The AEC suggests that the plan make more explicit if this solution would apply to the whole study area, and how beautification specifically addresses designated protected forested areas, watershed management, street canopy, and existing trees. The plan suggests in many places that these items are related, but the plan would benefit from making these relationships more explicit.

7. *3.5.3 Plan for a park-to-park Greenway connection in this sector if possible, using the old railroad ROW.* --The AEC agrees with placing this as a “near-term” solution but is concerned that it is listed as a “supporting” solution rather than a “primary” solution. The City Greenway Plan has been long contemplated but hasn't yet been undertaken. Prioritizing specific infrastructure development projects while it is being put in place is critical. We recommend making this a primary and near-term solution.

8. *3.5.5 Use the “developer fund” to plant trees along Forest Drive.* We applaud this recommendation but suggest that it be undertaken in conjunction with making Forest Drive safer for pedestrians and bicyclists. We also recommend that planting new trees be undertaken in conjunction with preserving old growth and priority preservation areas as described in action item #17.

9. *3.5.6 Continue implementing the City's 2016 Watershed Improvement Plan* – We agree that the areas described in the plan are ones that have a significant impact on local water quality. The AEC suggests that plan go further to articulate areas of overlap between the Sector Plan and the Back Creek and South River Watershed improvements outlined in the Improvement Plan.

10. 3.5.7 *Work with the County to establish a coordinated City/County street tree plan* – We agree that a coordinated effort is important but some of the suggestion in action item 23 is unclear. Is the plan suggesting that some tree canopy preservation could be done in other areas of the city to allow for redevelopment in the targeted area? If so, how does that correspond with the plans many calls for street trees, beautification, and greening of Forest Drive? How does it relate to the preservation areas identified in the 2009 Comprehensive Plan? It is also not clear how this action item helps the city to meet its goal of increasing the street tree canopy by 2036.

11. 3.5.8 *Adjust regulations to allow and encourage street tree and forested buffers* – The plan is not clear on how Solution #18 – Redevelopment Incentive Program – would achieve this goal. It is also unclear how this goal is related to Solution #23.

12. 3.5.10 *Review City standards to better incentivize the renovation/redevelopment sites developed prior to stormwater management requirements* – The AEC is in support of this recommendation and suggests that it be moved from a mid-term to near-term priority given the City's efforts in watershed improvement and coordination.

13. 4.0 Community Character -- Several of the Community Character designations do not include setbacks which are an important stormwater management practice, particularly in high-density areas. The AEC suggest incorporating a low-impact development approach and requiring minimum setbacks for all sections of the study area.

We appreciate the opportunity to comment on the draft plan and thank you for your consideration of our feedback.

Respectfully submitted,

Annapolis Environmental Commission