



## **Annapolis Neck Peninsula Federation**

November 1, 2018

re: ANPF's Comments for Planning  
Commission public hearing on the Forest  
Drive/Eastport Sector Study

Robert Waldman  
Chairman  
Annapolis Planning Commission

Dear Mr. Waldman and Members of the Commission,

You received a jointly-authored letter from Annapolis Neck Peninsula Federation (ANPF) and the Eastport Civic Association (ECA) that listed our concerns. We have more concerns but, frankly, not enough time to explain them in tonight's public hearing. As we said in our letter today, we found the study cumbersome and deficient. ANPF and ECA recommend that the study be deemed preparatory work for the 2019 Comprehensive Plan and regulatory initiatives.

Tonight, on behalf of ANPF, I would like to focus briefly on two issues.

### **Regulatory initiatives**

The study's proposal to change the City's Adequacy of Public Facilities law and Traffic Impact Analysis Guidelines does not belong in the study but rather should be thoroughly examined by the Planning Commission and Council. Such changes are critical to planning development and, also, effect the entire City. For the Commission to succeed, the City's APF guidelines must be objective, with clear expression of how mitigation is allowed and mitigation funds are used.

On the Annapolis peninsula, there are two hard constraints to development: the capacity of roads and schools. It is worthy of note that the Sector Study makes no mention of the limitations of school capacity. While the City's laws for Adequacy of Public Facilities for Schools is being improved, the City has historically ignored school capacity. That limit may not last long, from a legal perspective. But surely from a moral perspective, ANPF would ask that the Planning Commission to at least acknowledge the problems of overcrowded schools in this sector of the city.

## **Two Black Boxes of the Sector Study**

In my opinion, there are two black boxes in the study, that is, complex elements of the study with important effects, but whose contents are mysterious to the public.

The study begins with a lament that current zoning requires a suburban development pattern with setbacks and lower density (2 to 9 units per acre). The study says that higher densities would support improved transit services and connectivity. (p.19-20) Then, the study identified areas susceptible to change, e.g. large underutilized properties, older commercial sites. (p. 28). I presume that means increasing density.

Then the study looks at demographics and traffic. Our view of these two subjects is that the analysis is essentially a Black Box. I don't understand the assumptions or how the authors derived their conclusions. The issue of traffic analysis has been addressed in our letter and by others.

ANPF and ECA point out in our letter some anomalies in the growth projections which the study seems to be relying on, namely slower growth from 2020 to 2030 than the prior decade. See ANPF/ECA letter, Item J., p. 6-7. "Optimistic assessment that Forest Drive's current failure will be overcome is based on very limited data."

The other Black Box that I would like to learn more about is the designation of "Community Character", primarily on the map on the study's Section 4, p. 52. The study's goals in designating the community character for locations on Forest Drive and Eastport is transformation by adding mixed-use commercial and residential areas, with mostly low-scale Urban Village Centers (1 to 4 stories building height, brown)

However, there are several areas where the study designates Urban Centers (4 to 6 stories building height, dark blue), namely the Eastport shopping area, the Giant shopping area and Old Solomon Island Road. The study does not explain why they assigned such increased density to those locations. Clearly, the further east and out the peninsula that attractive shopping is located, the greater burden on traffic. That consequence is not discussed in the study. For example, currently, to my knowledge, there is no application for intense development of the Giant shopping area. So, presumably it is not included in the study's traffic predictions. It is unclear why the study would encourage such intense development.

A final request, following up on our letter to the Planning Commission, October 15, 2018. County and State comments are a critical part of the study because important infrastructure improvements are on their ticket. When will those comments be available?

Thank you for your hard work and for your attention to our concerns,

Sincerely,

Anastasia Hopkinson  
Vice President