Forest Drive/Eastport Sector Study
May 31, 2018 draft

Citizen's general comments and concerns on The Sector Study

Introduction

Members of the Annapolis Neck Peninsula Federation and the Eastport Civic Association have participated in the City of Annapolis' preparation of the Forest Drive/Eastport Sector Study from its' inception. We have attended all public presentations of the Sector Study, been interviewed as Stakeholders, responded to the two public surveys, provided comment on the process, and encouraged public participation by our members and neighbors. We live, work and shop on the Annapolis Neck Peninsula and Eastport, and every day we drive Forest Drive and Bay Ridge Avenue. We are intimately familiar with the area and are deeply interested in the City's vision for the next decade and beyond. We are pleased that the Planning Commission has requested our comments, concerns and questions about the Forest Drive/Eastport Sector Study.

We are familiar with many plans and studies of this type. The Forest Drive/Eastport Sector Study fulfills a requirement of the 2009 Comprehensive Plan and will contribute to the 2019 Comprehensive Plan. We hope that the Forest Drive/Eastport Sector Study will establish a vision that will guide city planners and the Planning Commission and that the residents of the Annapolis Neck, Eastport and the City will support. We hope it will be a planning tool adhered to and implemented.

A primary goal of the Sector Study is to accommodate growth and to provide tax revenues to the City by encouraging development of new residences and commercial/retail areas. The study suggests that increased development will provide current citizens with more desirable amenities, e.g., dining, entertainment, and with local jobs. To encourage development, the study proposes revisions to the way traffic impacts are analyzed for new development. The study also proposes a proliferation of new zoning designations. The Sector Study promotes values such as architectural guidelines, preservation of green space (forested areas), bike lanes and pedestrian paths, improved transit, etc.

The basic thesis of the Sector Study is that population and commercial/retail growth and its' attendant impact on traffic and quality of life could be rather modest or mildly challenging. Specifically, (population increase in the various scenarios of: 171 new residents in the entire sector area, projecting 0.55% annual population growth rate, 2000 to 2015, aka the Baseline; 2,535 for moderate growth in the entire sector area; 4,002 if there is larger growth in Eastport.

Though several of Forest Drive's intersections have been characterized by past traffic studies and by this study's traffic analysis as having failed, notably in the bottleneck around Aris T. Allen and Chinquapin Road, the effect on drivers is said to be an insignificant delay of a few minutes on an otherwise well functioning arterial.

Our major concerns, which we detail below and in the section of this document title "Detailed Questions", are about the assumptions and findings associated with the study's projections of population growth, the proposed method of analyzing new developments' traffic impacts, and the timing and funding of necessary road and infrastructure improvements.

Our fundamental planning dictum is: Infrastructure Before Development.

Our Principal Observations

Identifying the key issues by citizen survey

Section 2 of the main body of the Study describes the issues as perceived by about 1,200 survey respondents in the sector area. Pages 8-9 summarize the priority issues.

The first 4 issues raised in survey #1 asked "What you do not like about the study area?". Of approximately 1,200 respondents to that question nearly 900 persons, ranked traffic as their first and second concerns. Yet Section 2 focuses on land use, community character, zoning and other issues. In response to the question "What is Most Important to Focus on?", respondents ranked Transportation, Land Use and Environment well above other factors such as bike and pedestrian facilities, types of business, recreation/leisure, etc.

The document also cites, "vibrant economy" as a concern. This may be another term for lack of jobs. Yet this item was cited by only 16 respondents and is last on the list of "what you don't like about the area". The lack of candidates to fill many jobs, and low employment rates at the local, regional and national levels do not suggest that improving the economy in the City is a concern that should outweigh the safety, property and business values, and quality of life for the existing residents and businesses.

We feel the survey respondents prioritization of concerns about traffic and development have not been fully reported and may misrepresent residents' concerns. The document should be corrected accordingly. The study's various proposals and their assumptions need to be carefully assessed as being based in fact and offering realistic possibilities of achievement.

Inter jurisdictional cooperation to achieve major changes

Because the proposed solutions to these complex issues involve several jurisdictions, require substantial advance planning and capital project funds, new mass transit partnerships, and other important advances, we believe there should be far more detail about how this will be achieved and funded and in what time frame. Even recognizing that this Sector Study is a planning tool and not a detailed engineering feasibility study, the implementation/action plan is weak in these details.

Moreover, the adoption of the Sector Study will be an amendment to the 2009 Comprehensive Plan, and likely incorporated into the 2019 plan. The Office of Law has previously stated that the Comprehensive Plan has the force of law in Annapolis.

Some global concepts are summarized in this section. More detailed questions are and related comments about this Study are later in this document.

Metrics

We request metrics or measures to assess over time that the plan's suggestions, concepts, goals and proposals are effective or need adjustment. Metrics may be applied to goals in areas such as infrastructure funding and improvement, miles of new bike lanes and pedestrian paths, forest preservation, affordable housing and even architectural attractiveness of new developments.

Underestimated population growth

Refers to: Study section 1.2, Introduction, Study Area , p. 1; and
Appendix C, Mobility Analysis, Section 2 City Demographic Database, p. c-2 to c-4.

We believe that the scope of the geographic area examined for population growth may be too small and that results in overlooking factors that will impact traffic. If it does not already, the study should include various areas adjacent to the study's 13 TAZ areas on the western edge because residents in these areas will work, shop and dine in the Forest Drive/Eastport corridor. For further explanation, see our "Detailed Question #2, below.

We are very concerned that if the Sector Study's estimation of population growth is low, then subsequent plans based on that estimate will be inadequate. To adjust for the challenge of predicting the future, and to protect our quality of life, we strongly urge higher standards for the approval of new development.

Human behavioral change

To lower concerns about a growing population creating increased traffic congestion, the Study puts great reliance on projections about changes in human behavior. The Study speculates that a there will be additional retail facilities to satisfy consumer demand for shopping and entertainment and more residents will work locally in newly established commercial and retail businesses. It further speculates that workers and shoppers will use alternate modes of transportation, specifically bikes and buses

We ask for greater understanding of this prediction. We firstly are incredulous that drivers' habits will change in any meaningful manner. For example, we wonder if new technology such as driverless cars will not actually result in more vehicles on the road. Further, as this idea has been discussed in prior plans, we would like to see what has been historically achieved.

Mobility: Existing versus future Conditions

When will we, as citizens and city planners, come to our day of reckoning regarding the effects of development on traffic congestion? Studies and Plans have acknowledged the problem and suggested steps to begin to fix it. We support the commitment of City planners and Planning Commissioners to effectively taking those steps.

The Existing Conditions traffic model results (p. C-9 to C-11) show numerous failing intersections and movements. As we understand this result, it assumes the infrastructure remains as it is and the pipeline of potential projects within just the City are built out.

<u>As our most important overarching comment to the sector study</u>, <u>we submit that based on that traffic model it is imperative that the City utilize conservative traffic demand assumptions</u> as it approves developments and makes plans to pay for improvements from contributions of development impact fees or other means.

This model run confirms a future traffic setting that adversely impacts quality of life for current residents, safety on the roadways, and even future property values. (Even today realtors advise they do not take clients south on Route 2 during peak traffic times as it discourages buyers.) This type traffic setting would likely adversely impact existing businesses in the sector.

The sector study incorporates various potential factors and assumptions that can change traffic conditions for the better, but none of them are certainties. To overbuild and not have a sufficient number of these factors and assumptions materialize will greatly harm the Annapolis quality of life. We are concerned that this predicted state of the sector is not being fully appreciated as incremental growth in the sector area continues.

> "Although the planning commission is often charged with making short-term decisions, planning commissions must always keep the long-term ramifications of the decision in mind – remember, the primary responsibility of the planning commission is to implement the vision outlined in the comprehensive plan." *Planning Commission Duties and Responsibilities, Maryland Department of Planning, page 17*.

The situation we find ourselves in and the results of the Existing Conditions model run, while disturbing, should not be a surprise to anyone. The 2009 Annapolis Comprehensive Plan and the 2009 Anne Arundel County General Development Plan told us this day was coming.

"Without a decisive course correction in transportation policy, by 2030, traffic congestion will impede the flow of goods and services, choke the quality of life in the city and its environs, and dim the ambience that attracts millions of yearly visitors." *The Annapolis Comprehensive Plan, page 42*

"...by 2030 all major radial and cross-town routes will experience severe congestion including significant sections of Forest Drive, Hilltop Lane, Bay Ridge Road, Spa Road, Taylor Avenue, West Street, and Rowe Boulevard." *The Annapolis Comprehensive Plan, page 44*

The Anne Arundel County General Development Plan predicts in the future the Forest Drive corridor will operate at a Level of Service rating equal to "F." *2009 General Development Plan, Figure 9-3, Page 159 – Transportation Level of Service Forecasts*

The 2009 Annapolis Comprehensive Plan incorporated a separate Policy regarding Traffic on the Forest Drive Corridor. (*Policy 5 from ACP, Chapter 4 – Transportation addressing Forest Drive Issues)* and stated these necessary steps:

> "The City must keep a broad set of options available for dealing with this congestion in the future. If problems grow as forecasted, these options will become increasingly important in engineering an overall solution."
>
> "To adequately address congestion in the Forest Drive corridor it will be necessary to update the prior studies in order to recommend a comprehensive set of improvements…"
>
> "Aggressively lobby the State and the County to begin and complete the study of the 665/ForestDrive/Chinquapin intersection within the next year"

This sector study does not call for the immediate or near-term design and engineering of possible infrastructure fixes. It does nothing more than list once again the same potential solutions and puts off to another day, if ever, a decision on their viability.

If solutions are not viable, it is too much of a risk to permit the current and future pipeline

projects, plus to stimulate significantly more residential and retail density through the Study's call for a major rezoning effort. It is unacceptable to propose policies based on watered down assessments of failed intersections or the hope that citizens will simply get used to failure.

All of this development would be allowed on the assumption that traffic can be maintained at acceptable standards by hopeful, yet unproven, future changes in infrastructure, employment, walkability, biking, new mass transit partnerships and mass transit ridership, and changes in general driving habits. The sector study even makes the perverted assessment that the worsening gridlock at the western edge of the corridor is actually a good thing as it regulates traffic flow volumes to the east. That is not planning but rather, denial and avoidance of future consequences. This approach is not acceptable!

Land Use and the Environment.

Land use changes and intensification will have a negative effect on the environment and quality of life (more traffic, more trees cut, more runoff, etc.). The study seems to suggest, in part, that these changes can be justified by the benefit of having more tax dollars as result of zoning changes. We believe a cost/benefit analysis should be completed prior to proposing any land use/zoning changes.

While the Annapolis Environmental Commission is also submitting a more detailed response and questions related to the environmental aspects of the Forest Drive/Eastport Sector Study, some of the key questions and concerns we mutually share are as follows.

How does the Sector Study plan to meet the goal of increasing tree canopy to 50% by 2036 ?

How will the city coordinate with the County Green Infrastructure plan and Annapolis Conservancy Board? There is no current relationship between the city and county nor any plans for such coordination, no memorandum of understanding to do so in the near term or long term.

The primary suggestions of the study seems to be to allow more of the existing large tracks of forest to be removed and mitigated with street trees planted in the county Right of Ways. The 2009 Comprehensive Plan calls for preservation of the major sections of these forests. The Study changes this in a way that will have long lasting negative impacts on our community, eco-systems, and water quality.

We applaud the recommendation made by the Study to develop a City greenway plan, and more connectivity including with the county's Master Greenway plan. These items have been on the drawing board now for over a decade. It is unclear where how such items will be funded even if there were the political will to do so.
We applaud the recommendations made by the Study to add bike lanes, pedestrian bridges, etc., which have been suggested for years with no funding mechanism identified. In addition, the more traffic we add to places like Eastport, the less room there is for bike lanes.

Overall, the study suggest that we "encourage" open space, "work with the county to…", "Plan to make improvements", "make investments in other modes of transportation", all we want but without funding mechanisms the ideas outlined in the study are simply unrealistic. Without real action plans with timelines and funding, the environmental and beautification ideas outlined in the report do a very nice job of "greenwashing" for the sake of ensuring that the city can justify developing as much of our existing natural resources rather than finding ways to preserve them for the future.

New laws, plans with funding should be put into place BEFORE additional development takes place.

The overdevelopment of the Forest Drive and Eastport sectors will add to the impervious surfaces which will lead to diminished air and water quality and will have a negative impact on the environment and our budgets as we struggle to remediate our natural resources which cannot keep up with the additional assault.

Phased Implementation Action Plan (Section 5).

There is little structure in the approach to this section (e.g. grouping the actions by similar themes). The plan is an unorganized list of near term, mid-term and long term actions. There is no explanation of why an action is considered near term vs mid or long term. The importance or priority could usefully be indicated. Also, the plan should identify who has responsibility; i.e. what office in the City. Finally, the plan should include some discussion of the cost implications, including who pays and how much.

By way of example, below are three observations. See also specific questions about the Study in our detailed comments on the Study's Appendices, below.

- There are only 2 near term mobility related actions (bottom of p 60). Page 61, items 7 a thru d should be brought forward to near term. Given the importance of mobility, we suggest that all the mobility related actions be undertaken in the near term; i.e. before zoning changes, not after.

- Some of the joint (city, county, state) actions should be done sooner. Example – items 2, 3 and 5 under mid-term should be brought forward to be a near term actions.

- Same as above for the budgeting aspects of the capital improvements funding. Item 7 under mid-term should be done in the near term.

Additional Observations

The Planning Process

The community involvement aspect of the planning process is presented as though it was widespread and very successful. We appreciate that the City was active with its outreach efforts, at times facilitated by community groups such as the ANPF and ECA.

The process had a good start - 100 people attended 22 initial small meetings and 1,180 individuals provided input to the 1st online survey. 75 people attended public meeting #1. After the first public meeting the level of involvement fell off dramatically. Only 178 responded to the 2nd on-line survey; and only 37 attended public meeting #2. At public meeting #3 (presentation of the draft report), only 18 people attended; and only 7 responded to the City's on-line survey request for comments on the draft.

Further, we are concerned that the survey failed to fully characterize what is at stake. Namely, after asking residents what they wanted, there was no exercise to establish what respondents would trade-off for getting amenities, e.g., in terms of increased traffic, changes in lifestyle, loss of forest, tall buildings closer to the curb, etc. Do citizens really want two to six story buildings, close to the roadways? Do they want the Forest Drive arterial to become an urban boulevard with 9-foot-wide lanes and traffic slowed to 25 mph?

The study presumes that urbanism is desired by residents and discourages suburban design. Yet residents uniformly decry the urbanization of other nearby areas, e.g., Tysons Corner, Silver Spring, Ballston. We feel this contradiction may undermine support for the City's vision.

On page 5, the study says, "The drafted document reflects collective visions of the residents, business and other stakeholders in the FD corridor and Eastport."

We don't believe is a "collective vision" has been developed. This is misleading and should be corrected. The City tried hard in its outreach efforts, but was not very successful as measured by the degree of community participation in the mid and final stages of the analysis and review of the first draft.

Commenting on this second draft, with the Appendices finally attached, is the first time the public has had an opportunity to see exactly the models showed and what the City and its consultants have in mind. As these comments suggest, there are serious concerns.

Achieving New Community Character Types and Goals

We are concerned that the achieving new community character is far more difficult than the study suggests. The first paragraph on page 39 says, "Once the desired character designations are in place, zoning changes and changes to street standards should be developed." This sounds somewhat like a central planning, top-down, approach to planning whereby the City dictates what type of building can be constructed. How do you tie land use/zoning changes to achievement of new community character types? The buildings shown in the pictures are attractive, but what is the incentive for developers to build in these styles vs potentially lowest cost structures that exist now?

Affordable Housing

There is no discussion of whether or how investments in affordable housing could be stimulated by the proposed land use changes. This is one of the important economic development trends (issues) cited in Appendix B – US City Economic Trends Memo. Please provide suggestions and guidance as to how the Sector Study could help to achieve this important goal.

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6/18/18
Annapolis Neck Peninsula Federation
Eastport Civic Association

Forest Drive/Eastport Sector Study
May 31, 2018 Draft

Citizen's Detailed Questions on
The Sector Study

The comments below are keyed to pages of the main body of the Sector Study.

Study Question #1) Page 1: County government participation.

1a) Did the State Highway Administration provide any input as regards proposals to impact state roads (665 up to Bywater, southern section and terminus of Chinquapin Round, Spa Road, Old Forest east of Spa Road, Gemini connection impacts to Old Forest and Spa, new entrance to Spa for Providence Point development)?

1b) Can a more detailed discussion of coordination with the County and State be provided and copies of any comments from other jurisdictions be reviewed by the public or attached as Appendices?

Study Question #2) Page 2: Counting the entire area's population.

2a) Do the models include the County's new residential developments on the western border of the City and other nearby County growth that is projected?

2b) If not, may this additional population be included?

For example, on the far western edge of the study area (page 2, figure 1; p. 19; Appendix C, p. c-3) is an area labeled Traffic Shed TAZ area 513 which is outside the City limits. It encompasses Harbor Center and Parole Town Center which are already built out and will not add much "new" traffic.

However, there are, at a minimum 671 new residences in Anne Arundel County, immediately adjacent to the north and south of "traffic Shed Study Area" 513 which are recently constructed and opened or currently under construction. (See our Attachment "List of Parole Developments" for a listing of the 671 new residents.)

Those 671 new residences, and other growth planned in the County, do not appear to be included in the study's modeling of growth in traffic in the sector study. We believe this underestimates population growth and household formation.

When the City states that Annapolis has only been issuing about 50 new residential permits per year, the new 671 new residences is equivalant to 13 years of Annapolis issued residential permits.

The draft sector study at page 19 uses a figure of 2.6 residents per household as average household size in the sector area. Using this figure, these 671 new residences create 1,744 new residents on the immediate adjacent borders to the Forest Drive sector study area.

The study at page C-4 assumes that between 2020-2030 the sector population will only increase by 171 people with a growth rate of 0.02%. This seems quite low as these 671 new residences alone will bring in ten times that number of new area residents.

For population estimates that are used to model future traffic volume, we would like to understand what consideration has been given to various scenarios of growth in the County areas of the traffic shed, especially TAZ areas 555, 558, 557, 560, 559 which have large parcels of undeveloped land.

Underestimating the population size wholly undermines the Study's predictive capability.

Study Question #3) Page 3: Managing increased residential density.

The Existing Conditins model (page C-9) validatess the public's primary concern being traffic and overcrowding.

How does the plan's focus on increased density to catalyze transit ridership and increasing the tax base get balanced with maintaining the current quality of life for current residents?

Can addition of density be staged until after suggested infrastructure improvements are advanced in case the transit ridership does not materialize?

Has the area school overcrowding situation in the been assessed to determine when increased student capacity will be constructed to meet demand from increased density desired under the plan? School construction plans by the County will materially affect both the potential implementability of the plan as well as the timing.

Study Question #4) Page 3: Study's focus on improving the City's tax base.

Study 4a) Has analysis been done to verify that increased tax base will more than offset increased City expenditures for infrastructure and ongoing services? There should be some discussion of the risks and opportunities in this regards.

Study 4b) Will new residential subdivisions receive full benefits of city services or will their Home Owner Association be required to pay for the community's road maintenance, snow-plowing, trash pick-up, security and/or any other community needs?

Study Question #5) Page 7: Citizens' concern about traffic weighed against City focus on opportunities for increased tax revenue.

In online Survey #1 the over 1,180 respondents identified traffic during an accident situation and day-to-day traffic as the top two concerns by a large margin. Was addressing this major concern given any priority over increasing tax base or other objectives? There should be discussion of how to control the implementation of the proposed plan so as not to cause an increased concern over traffic by the public.

Study Question #6) Page 10: Public transit

The study states that "*The existing patterns of population and employment located along the main corridor make the area well-suited to public bus transit service*."

Study #6a) Is transit service today being utilized at desired rates?

Study #6b) If current transit service is underutilized, do we know why it is underutilized? And what plans are to improve utilization? This should be discussed.

Study Question #7) Page 14: Public Transit

The study states that "*A minimum density of seven units per acre or greater is generally considered compact enough for a neighborhood to function as a walkable community with moderate levels of bus transit service. Higher densities are generally considered necessary to support additional transit service*."

It is possible that residential density will increase and yet regrettably transit use will not increase. Obviously, this results in worse traffic congestion and, generally, a reduced quality of life for current residents.

Also, Table Four "Modes of Commuting to Work for City Workers", p.28, indicates that in the year 2000 only 755 of 20,408 workers, or 3.7%, used public transportation (excluding taxi service). Public transportation may be used for other purposes than getting to work.

Study #6a) What is the plan to increase ridership of the City's public buses for employment or other purposes?

Study #6b) Is there data or research to support a conclusion that in similar settings the proposed densities will be sufficient to materially increase the use of public transit?

Study #6c) Would implementing an improved mass transit system for workers traveling out of the sector be made difficult by the need to link with mass transit operated by other jurisdictions?

Study Question #7) Page 24, Section 2.2.6 Areas Susceptible to Change

Study #7a) Please provide Figure 8, Areas Susceptible to Change, to show other zoning designations in standard colors for low density residential, high density residential, commercial, preserved land, undeveloped green fields, etc.

Study #7b) Please provide a list of properties identified as susceptible to change, their current zoning and possible future zoning.

Study #7c) What is the process and timetable for informing property owners of rezoning?

Study Note #8) Page 24, Section 2.2.7.1: SHA ownership of Forest Drive.

"*The State owns and manages Aris T. Allen Boulevard (MD 665) up to the Chinquapin Round Road Intersection.*"

Please note that the the Maryland State Highway Administration owns, manages and controls MD 665 up to Bywater Road and not just to Chinquapin Round Rd.

Study Question #9) Page 25: Eastport Traffic Signals

The three City-owned traffic lights in Eastport do not yet have modern adaptive control technology.

Study #9a) What possibilities exist to prioritize getting the funding for this upgrade very soon? Can the developers of properties in Eastport (or likely to impact Eastport such as Parkside Preserve) contribute to a fund?

Study Question #10) Page 28: Commuting trend

"As of 2015... almost 80% (of City workers) commute elsewhere" for work, up from 53% commuters in 2000. This increased commuting "trend coincides with an increase in federal jobs in the region."

Study 10a) Could this be discussed and some explanations provided so the proposed plan to correct this can be better understood?

Study 10b) Isn't this higher commuter rate because higher paying jobs in technology, defense, federal government, etc., are located outside the sector? Is this likely to change based on new employers who will move into the sector?

Annapolis' demographics are somewhat unique with a reasonably large number of people in public housing without secondary degrees, and relatively high percentage of retirees and "empty

nesters."

The "college" town atmosphere that attracts many employers for skills and research is not typical here. The St. Johns College does not teach high demand technical skills in high demand; and is a unique teaching institution, but not a research university. Recent USNA graduates do not seek local employment.

Moreover, housing costs and local tax rates are both high, and available land for development (or redevelopment) is relatively limited.

Study 10c) With these and other typical variables looked at by employers assessing to relocate or expand, what is likelihood of new employers coming to the sector area to support the Sector Study's vision? How will that goal be realized?

Study Note #11) Page 31: The map view caption suggests it is EB Aris T Allen during the PM Peak Period. The photo appears to be of west bound traffic in the AM Peak period.

Study Question #12) Page 31: Congested Eastbound PM Peak traffic at Forest Drive around Chinquapin Round Road.

"*However, the PM peak period trips also include nonwork-related trips to destinations such as shopping centers, restaurants, and entertainment uses."*

The Study consultants have explained that additional congestion occurs on the western end of Forest Drive, in part, because of non-work trips for normal errands, doctor appointments, sports practices, sailing, entertainment and dining, etc.

Study #12) How has the traffic analysis accounted for the additional source of vehicles on Forest Drive from the dense residential development on County land immediately adjacent to the sector study area?

Study Question #13) Page 32, paragraph 3: City Demographic Database

"A new City demographic database was created to provide more accurate input data for this model."

Study #13a) Can that effort and the data sources be described and the results shared?

Study #13b) Does the City demographic database vary from the most recent census data? Does it account for persons who may not be included in census data due to language barriers, immigration status or other reasons?

Study Question #14) Page 35-36: 3. Potential Solutions - Mobility

Please prioritize the laundry list of possible mobility improvements to address vehicular and transit uses, including time frames for completion, and specific site recommendations when possible.

Specificity will help to prevent the "idea" from never being acted on or forgotten and it helps to keep people accountable. For example:

- "Improve other local street grids to create network redundancy and route choices." Recall that the comprehensive plan called for improving north-south City traffic flow by aligning Admiral and Chinquapin Round at West Street. That effort was never implemented when the new Audi dealership and taco Bell were approved. What possible locations are considered for this remedy? Is aligning the new traffic light for Parkside Preserve with Forest Hills Avenue being considered, and if not why not?

- "Work with the County and the State to further improve the Fairfax Road/Chinquapin Round Road/Bywater Road segment." A study of this intersection was to be aggressively pursued under the 2009 comp plan for completion by 2010. What is the timing for this recommendation since the area is the primary bottleneck and problem area in the sector?
- "Evaluate areas of speeding and add traffic calming measures on local streets where cut through traffic moves too fast." At what locations and what type devices?

- "Incentivize access changes to corridor frontage properties that have driveways that back onto the arterial or that lack access to a side or parallel street in order to reduce congestion from cars backing into traffic or waiting to make left hand turns." What type of incentives, who pays for the work, and does right-of-way exist? How many driveways could possibly get eliminated with this effort?

- "Incentivize land uses that provide local jobs within the city to rebalance the current one-directional peak commuter rush hour travel pattern." What incentives and what type of employers? Why would they relocate to Annapolis, and why might they not? Some discussion on the pros and cons (risks and opportunities) of achieving this result would be beneficial.

Study Question #15) Page 60: Phased Implementation 0-3 years (2018-2021)

Road Improvement Escrow Fund. Establish a fund to collect APFO contributions that can be assigned to City CIP projects and joint County-City CIP projects that improve City transportation network capacity in areas impacted by the specific projects. Is there any reason this could not be implemented immediately with a list of priority projects such as new, adaptive control lights in Eastport? In the past City staff has resisted this saying the City will be sued if there is not a sufficient "nexus" to a specific development. How is this concern resolved so as to implement this recommendation?

Study Question #16) Page 61: Phased Implementation 3-6 years (2021-2024)

SHA/County/City Joint Project Planning. Work with SHA and the County to plan for future capacity improvements to the Aris T. Allen Boulevard, Chinquapin Round Road, Bywater Road, and the Fairfax Road area. This item needs to be accelerated into the first year of plan implementation. This area is a primary traffic bottleneck and it is unacceptable to operate under a premise that to maintain it in a failing state that continues to deteriorate further is a good outcome as it regulates traffic flow into the corridor.

The later suggestion to retain this bottleneck until another eastbound lane is added from Aris T. Allen to Hilltop is criticized elsewhere. If there are no viable fixes for this intersection, that impacts both short and long term planning and needs to be known as a gating item.

Study Question #17) Page 61: Phased Implementation beyond 6 years (Beyond 2024)

County Corridor Project Planning. Work with County to develop a phased plan funding of design and construction of corridor enhancements and capacity improvements as needed by City and Annapolis Neck Peninsula growth. This effort needs to be accelerated to determine which, if any, of the suggestions for capacity improvements are implementable. If they are not, it is possible that adding commercial and residential density to the sector makes no sense based solely on an assumption that public transit use and walking will reduce driving trips. Moreover, the likelihood that new retail and commercial locations will offset gains with new traffic coming into the sector must be assessed as part of this effort.

Gemini Road Extension. Develop a final alignment, engineering plans, and acquisition plans as needed for the extension of Gemini Road to Spa Road. Coordinate with property owners and the County. This is a viable and necessary goal as it is one of the few locations where redundancy is achievable, especially when coupled with a connection to Skipper Lane all the way to the Safeway at Bywater Rd.

The State has to be involved in this effort since Spa Road as well as Old Forest are both state roadways in this location. This effort needs to be assessed now as the developers of Providence Point on the Crystal Springs land propose a major new intersection on Spa Road that would intersect with this plan. This planning is also critical now as recent traffic impact studies for the Lidl grocery store and the Rodgers property indicate that the Forest/Spa intersection is failing today and yet major new growth is planned. The Existing Conditions model, Page C-9, in the sector study confirms this. Even if the entire list of roadway improvements are installed, the improved condition model at page C-30 still shows both NB and SB Spa Road failing at both AM and PM Peak Hour.

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6/18/18
Annapolis Neck Peninsula Federation
Eastport Civic Association

List of development projects
Parole Development Area
Anne Arundel County

Ordered from north to south.

Below is a list of recently built residential developments in Parole along Solomon Island Road, Route 2.

Residential units total = 671, built in 2016 to 2018 and opened or opening soon.

Maris apartments. **<u>293 Units</u>**.
Off West Street, behind the Double T diner. 2445 Holly Avenue, Annapolis.

Opened for rent of apartments (mostly studios) in Spring 2018 for rental apartments.
Studio apartment - $1,690 - $1,760/month
One Bedroom apartment - $1,745 - $1,900/month
Two Bedroom apartment - $2,280 - 2,490/month

James apartments. **<u>236 Units</u>**.
At the intersection of Admiral Cochran Drive and Solomons Island Rd.

Open for leasing since Winter 2018 and not yet filled.
All of the available units are two bedrooms.
Rents range from $2,300 to $3,200/month

Admirals Square Townhomes. **<u>92 units with about 62 completed</u>**.
At the intersection of Admiral Cochran Drive and Solomons Island Rd.

Purchase prices range from $384,900 to $549,990.

Cove Townhomes. **50 town homes** under construction.
At the intersection of Admiral Cochran Drive and Solomons Island Rd.

Purchase prices advertised as "From the Upper 400s".
Townhouses are three and four story units with three bedrooms and two car garages. Many have rooftop decks.

<u>Notes on Parole</u>

Parole is zoned as a Town Center to encourage dense development in its' four shopping areas (Festival at Riva, Towne Center, Westfield, Jenniper Shopping Area). Areas adjacent to Parole are zoned Residential R15, R22 and Commercial C3.

Parole is a census-designated place. The census counts of Parole's population increased by 1,891 people or 13.5% from 15,922 people in 2010 from 14,031 people (6,645 households) in 2000. The census area is 11.8 square miles, extending from the Severn River to the South River. The 2000 median income for a household was $67,479; for a family, $82,988. (source: Wikipedia "Parole, Maryland")

ANPF, 6/16/18

Forest Drive/Eastport Sector Study
May 31, 2018 draft

Citizen comments and questions on Appendix A Pipeline Development

A1) **Residential units are not fully counted.** The pipeline table in Appendix A is incomplete and materially underestimates the near-term growth in residential units.

The Sector Study indicates 877 residential units. As the Lofts at Eastport Landing have reduced their number of units from 127 to 95, the number of residential units in the pipeline would be 845.

Because this is a plan, what is reasonably anticipated should be included, even if no application has been made to P&Z. For example, the Watergate Apartments' has discussed adding 607 apartments so that is clearly on the horizon. By our count, the total of residential units in the sector is 1,809 (=845 + 964).

Development projects not counted in Sector Study

	Name	Number of Units	Location
18.	Parole Place	229 = 190 apts. + 39 TH	plus retail sq
*	Woodside Gardens/Newtowne	36 apts.	
43	Bay Village Assisted Living	92 units	
*	Watergate Apts.	607 units, est.	
	Total	964 units	

* Not included on Sector Study Appendix A, Pipeline Development, Chart on p. A-2

6/16/18
Annapolis Neck Peninsula Federation

Forest Drive/Eastport Sector Study
May 31, 2018 Draft

Citizen comments and questions on
Appendix C
Mobility Analysis

General Questions and Comments

BMC Model, City Demographic Database and the modeling generally

C1) Page C-2 - C-3, Section 1, Refined Baltimore Metro Council (BMC) Model.

Preparing a refined BMC Model specific to Annapolis seems practical and useful. That said, the public does not have the expertise to assess the viability or realistic projections of the model and it must rely on the advice of professional engineers. Some additional information is useful.

a) What are the future plans for the use of the "refined BMC Model"?

b) Assuming it will be used as a future City planning tool, and possibly incorporated into use to assess traffic impacts of future developments, can more detail be provided in an explanation of how the "refined" BMC's regional model was created?

c) How was new/different data gathered and how was the model changed?

d) Was this refinement a first such effort with the BMC, or is this refinement approach typical for other jurisdictions trying to use the BMC Model for localized usage?

e) What version of TAZ data is used? Please provide the TAZ data spreadsheet and also the study's refinement of the original data.

f) TAZ data predictions are available to the year 2040 and 2045. Why does the study only use predictions to the year 2030?

g) What assumptions, principles and practices were used to "refine" BMC TAZ data for "refining" estimated future population increases?

C2) Page C-33, Section 4, Sub-Section B, Land Use Changes - Mid and High Sector Growth Scenarios

TAZ data is developed as a tool for transportation planning, not community land use plans. Transportation planning typically assumes continued growth. We are concerned that we are basing our future on arithmetic algorithms that project constant increases.

a) Are the TAZ projections simply linear extrapolations of historical data?

b) How was the TAZ data altered or enhanced to address land use planning?

c) What alternative scenarios to continued growth were considered?

C3) Page C-3, Section 2, City Demographic Database - Methods and Sources.

"The data reflects current growth trends, current zoning, approved developmemt, and estimates of possible future development. It quantifies information by TAZ, such as population, average household size, median household income, workers and jobs."

a) Can a description be provided as to how City staff prepared the new City demographic database? As this will likely be a future planning tool and is critical to the traffic model developed, more detail on its creation would be appreciated.

b) What sources were used for what refinement purpose, etc.? Please provide details on how each quantitative element was sourced, refined and used.

c) Is a denser population with the re-development in HACA properties assumed? Earlier formal proposals were for a 67% increase in density at just the Newton property that feeds into Forest Drive.

C4) Page C-1, Section 2, City Demographic Database - County Growth.

a) Does the new City demographic database incorporate the demographics and growth projections of adjacent or nearby county lands?

It is not clear and maps of TAZ areas (See Page C-3) suggest that new County development is not factored in. This seems relevant as these residents will be using the current and future sector schools, services, commercial and retail establishments and roadways. This assumption is supported at page C-18 where it it is noted that in the AM peak the distribution reflects 38% of the traffic is inbound. There are presently 671 new County residences just outside the sector study area which are presumably some of the additional traffic that will enter the sector study area.

Including county residents affecting the sector is critical since the model run for existing conditions (Pages C-9 and C-10) confirms the Forest Drive corridor is “on the edge of capacity” as advised by Anne Arundel County as far back as 2011. Moreover, County and State assessment of the proposed infrastructure capacity upgrades suggested on pages C-28 and C-29 will certainly include the relevant county growth to support a cost benefit and needs analysis.

Analysis of Existing Traffic Conditions

C5) Page C-1, Section 3, Existing Traffic Conditions Analysis - Traffic Counts.

This City’s Policies and Guidelines For Traffic Impact Analysis for Proposed Development establish parameters for conducting traffic volume counts. That document mandates that existing traffic volume should be based on current count information by taking average three- to seven-day machine counts to determine daily and peak volumes along roadway segments, and peak hour turning movement counts should be used to determine peak intersection volumes. Further detail notes that three-day counts should be taken on Tuesdays, Wednesdays and Thursdays. Peak hour turning movement counts should be based on the highest four 15-minute intervals for AM and PM from a 72-hour period of counts.

a) Why was this process was not followed to gather the traffic data?

b) If a different approach was used, was this because of a desire to reduce costs or work within time constraints?

c) Were there other reasons to have counts just be one day counts as is implied from the list of count dates on page C-5?

C6) Page C-1, Section 3, Existing Traffic Conditions Analysis - Counts by intersection movement.

a) Were new traffic counts conducted for each movement at the designated intersections, or just certain movements?

b) Were the counts done manually, with tube counters, or through some other methodology?

c) It would be appreciated if the actual count results could be included as an Appendix so they can be compared to past and future counts used in various past and future traffic impact studies. This database will help assess individual development TIS work.

C7) Page C-1, Section 3, Existing Traffic Conditions Analysis - Dates of Count.

It is noted that the count dates were generally taken when the General Assembly was not in session in Annapolis.

a) Does the City have any estimates of the additional traffic generated during session by elected officials, staff, lobbyists, etc., during the General Assembly?

C8) Page C-1, Section 3, Existing Traffic Conditions Analysis - Counts by Field Observation.

It is noted that using the existing traffic volume data and observations of existing traffic operations, estimates for the percentage of utilized capacity along the network's road segments were quantified. "Capacity Utilization" was derived by comparing traffic volumes, for each direction within each segment, against the field-observed per-lane capacity of the corridor. The per lane capacity was obtained from field observations in which segments that are currently operating at full capacity were identified (as evidenced by constant signal cycle failures and unmet demand).

"Capacity Utilization" is not a term or measurement used in Annapolis' APFO or TIS Guidelines. We are trying to understand why it is being used now, what it is predicting for the future, and if the City plans to use it as a measuring tool going forward.

a) When is a measurement of "Capacity Utilization" typically used as opposed to level of service to assess intersection or movement performance?
b) Are there standard published methodologies for calculating "capacity utilization" based on the actual facts like lane width, type of arterial, actual traffic volumes counted, etc.?
c) If so, how fully do the results of these standard methodologies match up with the model results in this draft sector study?
d) Is "Capacity Utilization" a measurement device that is regularly assessed when doing TIS work as an alternative to the traditional Level of Service determination? Does one method create a more accurate prediction of future service than the other?
e) We want to understand what a particular "Capacity Utilization" % tells us. Are there tables that show how calculated "Capacity Utilization" percentages compare to a level of service determination for the same intersection or movement? For example, the Capacity Utilization table on page C-44 shows that the results for north and southbound Spa Road are generally at 75% to 80% under all the models run for the draft sector study. Yet, at that level of "Capacity Utilization", in both the Existing Condition model on page C-9 and the Improved Condition model on page C-30, the level of services results are always E or F.

C9) Page C-1, Section 4, Future Baseline Traffic Evaluation.

The Baseline Scenario assessed the sector's future composition, based on "existing City and County policies."

a) What type policies were relevant to making this future composition determination? Were specific current City and County zoning and development regulations considered?
b) Were any considerations given to impacts of future changes to these same "existing City and County policies?" Might these improve or detract from model results?

C10) Page C-1, Section 4, Future Baseline Traffic Evaluation - growth projections.

The model estimates the new travel demand generated within the road network segments "by analyzing demographic growth projections."

a) Are these growth projections based on the BMC Regional model, the new City Demographic database referenced above, or some other projections?

b) How do the demographic growth projections make any adjustments for the unique changes that are ongoing in Annapolis? We refer as an example to schools filling faster than planned using regional student assumptions, neighborhoods with parking issues due to extended families and non-related persons living in residences, etc...

C11) Page C-1, Section 4, Future Baseline Traffic Evaluation - Non-resident traffic projections.

a) How does the Baseline Scenario build in future, non-resident traffic coming into the sector to utilize the City's and the county's new commercial, retail and other destinations? This will be traffic volume not counted in the 2017 counts used.

A good example is the new Lidl grocery store to be built. Many people make a special trip to shop at Trader Joes, so the same should be built in to this modeling. This same question is more important for the other model runs for the Mid and High Scenarios as these assume new employment and retail establishments are built inside the sector.

Refined BMC Regional Model

C12) Pages C-2 to C-3, Section 1, Refined BMC Regional Model.

It is noted that the BMC traffic model presents a conservative view of travel demand as it assumes drivers do not make significant changes to their travel mode choices in the future. It also does not factor in the impacts of possible future technological changes on travel such as mixed uses, ridesharing, driverless cars, etc.

As our most important global comment to the draft sector study, **we submit that based on the Existing Condition scenario results on pages C-9 – C-11 showing numerous failing intersections and movements, it is imperative that the City utilize these conservative assumptions going forward as it approves developments and plans for contributions from developers for impact fees or other mechanisms to pay for improvements.**

This model run confirms a future traffic setting that adversely impacts quality of life for current residents, safety on the roadways, and even future property values. (Even today realtors advise they do not take clients south on Route 2 during peak traffic times as it discourages buyers.).

The draft sector plan incorporates various potential factors and assumptions that can change traffic conditions for the better, but none of them are certainties.

To overbuild and not have a sufficient number of these factors and assumptions materialize will greatly harm the Annapolis quality of life.

The need to have a clear understanding of the viability of the infrastructure improvements recommended on pages 35-36 is central to the role of planning and even the duties of the Planning Commission. "Although the planning commission is often charged with making short-term decisions, planning commissions must always keep the long-term ramifications of the decision in mind – remember, the primary responsibility of the planning commission is to implement the vision outlined in the comprehensive plan." *Planning Commission Duties and Responsibilities, Maryland Department of Planning, page 17*.

Today's constraints on land use, serious concerns about traffic congestion, and the Existing Condition scenario's indications of intersections failures should not be a surprise to anyone. The 2009 Annapolis Comprehensive Plan and the 2009 Anne Arundel County General development Plan told us this day was coming.

> Without a decisive course correction in transportation policy, by 2030, traffic congestion will impede the flow of goods and services, choke the quality of life in the city and its environs, and dim the ambience that attracts millions of yearly visitors. *The Annapolis Comprehensive Plan, page 42*

"...by 2030 all major radial and cross-town routes will experience severe congestion including significant sections of Forest Drive, Hilltop Lane, Bay Ridge Road, Spa Road, Taylor Avenue, West Street, and Rowe Boulevard." *The Annapolis Comprehensive Plan, page 44*

The Anne Arundel County General Development Plan predicts in the future the Forest Drive corridor will operate at a Level of Service rating equal to "F." *2009 General Development Plan, Figure 9-3, Page 159 – Transportation Level of Service Forecasts*

The 2009 Annapolis Comprehensive Plan incorporated a separate Policy regarding Traffic on the Forest Drive Corridor. (*Policy 5 from ACP, Chapter 4 – Transportation addressing Forest Drive Issues)*

> "The City must keep a broad set of options available for dealing with this congestion in the future. If problems grow as forecasted, these options will become increasingly important in engineering an overall solution."
>
> "To adequately address congestion in the Forest Drive corridor it will be necessary to update the prior studies in order to recommend a comprehensive set of improvements…"
>
> "Aggressively lobby the State and the County to begin and complete the study of the 665/ForestDrive/Chinquapin intersection within the next year"

This draft Sector Study plan does recommend a comprehensive set of improvements, but it does not offer any acceleration of the need to design and engineer these possible infrastructure fixes. It does nothing more than list once again the same potential solutions and put off to another day, if ever, a decision on their viability. The modeling by this sector study confirms that the time for "engineering an overall solution" arrived some time ago.

Feasibility studies for each of the proposed improvements are needed as soon as possible. If, eventually, a sufficient number of the proposed fixes are deemed not viable, it is too much of a risk to allow (i) the current and future pipeline projects listed in Exhibit A, plus (ii) the adjacent County development, plus (iii) adding new residential and retail density through the Sector Study's proposal of major rezoning and denser development.

Based on the modeling results, it is not reasonable to plan and approve developments on the assumption that traffic can be maintained at acceptable standards by potential future changes in infrastructure, employment, walkability, biking, new mass transit partnerships and mass transit ridership, and general driving habits? The travel mode choices table on Page C-45 assumes that although the mode of commuting by City workers by vehicle rose from 68.8% in 2000 to 72% in 2015, by 2030 this will drop by

20% down to 52%. This is a very big risk to assume, particularly if many of the recommended infrastructure projects never materialize.

City Demographic Database

C13) Page C-4 top, Section 2, City Demographic Database (and Page C-33, Growth Scenarios).

The chart on both pages suggests that between 2020-2030 the Baseline Scenario buildout in the sector will add 251 new households, but only add 171 new residents.

a) How is this possible as it seems population must go up by a number larger than the number of new households?

On many properties in the Annapolis pipeline, less dense housing and population is being replaced with more dense housing, and completely new housing is being added. The figures on page C-33 for the Mid and High Scenarios more realistic as the population grows more than the number of new households. The Mid Scenario assumes 2.44 new residents per new household. The High Scenario assumes 2.62 new residents per new household. These seem more in line with the draft sector study noting the average residents per household today is about 2.6.

Existing Traffic Conditions Analysis

C14) Page C-6, Section 3, Existing Traffic Conditions Analysis - Queues.

It is noted that follow-up visits were made to observe traffic operations and queues on weekday PM times. On page the charts at pages C-9, 10 and 11, queue lengths are noted. It isn't clear if queue lengths are being used to adjust LOS outcomes. Some clarification of their relevance would be helpful.

a) What is the basis for determining these queue lengths?

b) Are they nothing more than actual queue lengths measured at a certain peak time?

c) Are they measuring whether the queue length up to a point that the que interferes with another movement?

d) Are they simply computer generated queue based on use of the software?

C15) Page C-7, Section 3, Existing Traffic Conditions Analysis - Problem Intersections.

The recommendation is that if it is determined that queues are disrupting traffic flow (such as turn queues that extend beyond their storage and block through lanes) or that queues extend into or beyond an adjacent intersection or major driveway resulting in gridlock or system-wide congestion, those queues should be addressed, whether they are occurring along a major or minor approach, or within a single turn lane.

a) Was a list developed on locations that queuing is now or may be a problem?

b) If so, can that list be attached as an exhibit or table? This may help future planning, TIS focus, determining mitigation options, etc.

C16) Page C-7, Section 3, Existing Traffic Conditions Analysis - Coherence with other traffic models.

It is noted that two pre-existing Synchro/SimTraffic models, previously prepared to look at the sector, were utilized to analyze the list of intersections. One model was provided by Anne Arundel County and was developed for the Forest Drive Corridor.

a) Do the results of this Anne Arundel County model confirm or conflict with the conclusions shown in the results of the modeling done for this draft sector study?

b) Can the public obtain access to a copy of any reports or model summaries created by Anne Arundel County with its use of this model? Of particular interest would be a determination of any supporting or conflicting assumptions used to run each model.

c) What aspects of the BMC Regional model made it a better choice for the work in the draft sector study as opposed to using the model provided by Anne Arundel County?

C17) Page C-7, Section 3, Existing Traffic Conditions Analysis - LOS standards.

When a transportation grid is failing or predicted to fail, growth should stop until verifiable remedies are established. Planning is dealing with reality, it is not gambling that a future fix might arrive. For several decades the Annapolis Guidelines for conducting traffic impact studies require assessing and mitigation LOS failures for both the intersection as a whole, and individual lane movements at each intersection.

Much of this section of the draft sector study explains why, due to the need to keep the main artery moving, so many individual lane movements are failing now and will be failing in the future. This is not a situation of one or two individual lane movements falling to E or F levels of service. There are many such failures and, collectively, they represent adverse impacts on quality of life, safety, and property values. This setting does not reasonably point to loosening the measurement standards that assess traffic impacts by focusing primarily on overall intersection LOS.

On the contrary, standards should be strengthened so that many individual approaches do not fall to unacceptable service with no prospects for correction. The model results reflect that the projected level of growth is not desirable. Individual lane movements could develop very long queues that do not intersect with another lane or "major" driveway. This is not allowed under current standards, and it should not be allowed in the future as a way to address the growing realization that the system cannot handle the growth.

C18) Pages C-9, Section 3, Existing Traffic Conditions Analysis - Newtowne Dr.

The table does not reflect "Overall Intersection" outcomes for the intersections at Newtowne Drive and Old Forest Drive.

a) Is there a reason for this?

C19) Pages C-9 to C-11, Section 3, Existing Traffic Conditions Analysis - Addressing Serious Issues.

The "planning level analysis" outcomes of the current conditions reflect serious issues at many movements, and multiple overall intersection failures.

a) Should these results encourage a rapid funding for more detailed feasibility studies at least (and possibly engineering studies) of the viability for all of the suggested infrastructure fixes?

b) If some or all of them are not viable, or for whatever reason are not supported by the County and/or State whose roadways are affected, is an assessment of a development moratorium warranted by the current conditions?

C20) Page C-19, Section 3, Existing Traffic Conditions Analysis - Bottleneck.

The model and observations confirm that the constant demand/flow of PM peak period traffic Eastbound (EB) Forest Drive, east of Chinquapin Round Road, is operating at 100% capacity. There is significant unmet demand along EB Forest Drive between these two intersections. At no time are vehicles along either SB Chinquapin Round

Road or EB Aris T. Allen Boulevard not waiting to enter this segment of the road network. The intersections around Forest Drive/Chinquapin are a bottleneck.

This finding is not new and it mandates the aggressive pursuit of a joint city/County/State effort to completely and fully address the Forest Drive/Chinquapin bottleneck immediately. This was promised in the 2009 Annapolis Comprehensive Plan to be completed "aggressively" by 2010.

If that analysis finds that sufficient fixes do not exist, then a very different planning process for this sector will be required.

a) If the State and County are not amenable to infrastructure improvements here, have any parameters been considered of what impacts that will have on planning and development?

b) At page C-23 it is noted that "improvements recommended to address the current problems will largely accommodate" growth to 2030. What if some or all of those improvements recommended cannot be implemented?

Future Baseline Traffic Evaluation

C21) Page C-22, Section 4, Future Baseline Traffic Evaluation.

The Sector Study states that the resulting analyses of a future baseline model show "that in 2030, the current areas with road capacity issues are still an issue. However, no additional road link sections have worsened to the point of reaching 100% capacity." This may be true, but whether or not a segment reaches "100% capacity" is not a standard used in Annapolis for planning and required traffic impact studies.

More detailed questions and concerns as regards the use of a capacity utilization metric are discussed in Section 7 above. To have the sector study be more clear and useful, all model outcomes should all be expressed with Level of Service results so comparisons can readily be made. To rely on a conclusion that an intersection never gets as bad as the 100% capacity found at Chinquapin Round is not meaningful in terms of assessing transportation issues, and could be misleading. As is discussed above, for movements for NB and SB Spa Road stated to have a 75% to 80% "Capacity Utilization" in both the Existing Condition model on page C-9 and the Improved Condition model on page C-30, the level of service results are always shown as E or F.

a) For the Future Baseline Traffic Evaluation to 2030, can you provide tables with results in the same format as the tables on pages C-9 to C-11 showing the level of service and delay results?

Possible Remedies to Existing and Future Baseline Conditions

C22) Page C-27, Section 5, Possible Remedies to Existing and Future Baseline Conditions - Modeling to the year 2040 and 2050.

a) Since the model already exists, and using the assumed growth rates that may be adjusted based on the questions above (e,g, influence of County growth, increased density in HACA housing), can Future Baseline Traffic Evaluation models be run for 2040 and 2050?

These outcomes probably would reflect a more realistic time frame for implementing to some degree the list of possible remedies. They also might lend support for the need to accelerate rezoning, complete streets, mass transit partnerships and other remedies, apart from the proposed physical infrastructure improvements.

C23) Page 28-29, Section 5, Possible Remedies to Existing and Future Baseline Conditions - Timetable and funding of Infrastructure Improvements.

The timetable and funding of potential physical infrastructure improvements are critical to planning and to implementation of the plan.

a) Before even considering who pays for them and determining a realistic time frame for getting them on a Capital Improvement Project schedule, when will feasibility studies for all the improvements be reported?

b) How far along are discussions with the County and State on (i) what do they think of these suggested remedies, (ii) how quickly do they feel feasibility determinations can be completed, and (iii) how quickly can engineering studies be completed?

The results of these discussions should be incorporated into this sector study and specific target dates for completion should be included. Accelerating an assessment of the viability of these fixes is particularly necessary because even with them being installed, there remain many individual movements that continue to fail as is reflected in the results on Pages C-30 and C-31.

Of additional concern is the fact that by 2030 under the Mid Scenario (1036 Households and 2535 residents) and High Scenario (1526 Households and 4002 residents) with many new drivers will be added to the sector. If the assumed 20% reduction in City employees who will drive to work does not materialize as is assumed on Page C-45, a bad situation exists.

c) If not all the proposed infrastructure improvements are installed, and if only some of the reduced driving takes place from the other assumptions, what will be the

degradation of traffic on Forest Drive? Stated differently, can the model be used to reflect only some of the suggested capacity improvements materializing?

C24) Page C-29, Section 5, PM improvements.

There is a recommendation to reduce queues and delays along EB Forest Drive at the west end of the corridor by *retaining the existing bottleneck by electing not to make improvements that move queues further down the corridor, or improve PM flows, by providing an additional through lane along EB Forest Drive, beginning along Aris T. Allen Boulevard, and dropping as a second left-turn lane at Hilltop Lane.*"

a) This is somewhat confusing as there already exists two left turn lanes from Forest onto Hilltop at that intersection. Please clarify the suggested improvement.

With respect to the recommendation to retain the existing overcapacity situation at the 665/Chinquapin Round intersection, we strongly oppose any such approach to managing traffic overcapacity. This entry to the sector is already dangerous. The March 2016 Existing Conditions Report completed by Anne Arundel County concluded that along 665 the "crash rates are significantly higher than the statewide average rate". Maintaining the status quo is not acceptable.

Even more egregious, this suggestion effectively keeps the quality of life lessened for the lower income segment of the community living in communities south on Bywater and down Fairfax, only to benefit higher income segments to the east. It is necessary to aggressively engineer potential solutions at this bottleneck and plan accordingly based on that engineering assessment.

C25) Page C-35, Section 5, Modeled Growth Rates - Traffic Volume Growth

The chart does not contain all the intersections shown in the other tables of modeling results.

a) Is there a reason for not including all intersections?
b) Are these results available for each intersection along the corridor?
c) Does this table reflect the assumed 20% reduction in City residents driving to work as shown in the table on page C-45?
d) Please provide this same data for all the intersections.

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6/18/18
Annapolis Neck Peninsula Federation
Eastport Civic Association

Forest Drive/Eastport Sector Study, May 31, 2018

Citizen comments and questions on
Appendix D
Possible Modifications to
Adequate Public Facilities Traffic Ordinance and
Traffic Impact Analysis Guidelines

GENERAL COMMENTS

The City has long had in place Policies and Guidelines for Traffic Impact Analysis for Proposed Development in the City of Annapolis. These guidelines provide a very clear and unambiguous methodology for assessing existing conditions, conducting traffic volume counts, determining current and future levels of service, and mandatory roadway and intersection mitigation or improvements. Minor changes to the guidelines over the years have not changed these clear standards.

Levels of Service is the primary and preeminent standard of assessing traffic conditions.

Pursuant to these standards of traffic impact analysis, it is mandatory to first determine levels of service (LOS), and if LOS is evaluated at being below “D”, that is at "E" or "F", either at the intersection as a whole, or with respect to each particular intersection movement, then developer remediation is required. The LOS must be brought back to “D” or better. Notably, mandatory remediation must be maintained for level of service failures at each lane movement at an intersection.

This need for mandatory remediation for all lane movements going forward is evidenced by the model results shown for the “Improved Condition” on pages C-30 and 31. Many individual movements are still at levels of service E and F, even if all the proposed infrastructure improvements as listed on pages C-28 and C-29 are ultimately installed. If some or all of the capacity improvements are not installed, the LOS predictions will obviously be worse than shown on pages C-28 and C-29. To allow many individual lane failures add up and worsen over time will inevitably lead to poorer traffic outcomes and quality of life for all within the sector study area. Obviously, some neighborhoods will absorb more adverse impact than others.

The Sector Study's proposed lowered standards for individual lane movements and un-signalized intersections may well allow many new developments to be approved even when they cause LOS to fall below a level D. Strikingly, the proposal would allow developments that cause an intersection or movement to fail to be approved even when remediation is not possible. In this situation, the proposed changes allow a developer to make remediation of an undefined type, undefined cost and at an undefined location elsewhere in the City.

There is no rationale for this approach other than endeavoring to move forward with growth despite the predicted outcomes reflected in the Existing Conditions model shown at pages C-9 to C-11. This approach ignores the realities of the Forest Drive corridor and Eastport configuration. It is frequently stated in the draft Sector Study that the County's commitment to maintain the mainline flow on Forest Drive will necessarily diminish the LOS of many approaches to Forest Drive forever into the future. (See page C-7). This being the case, the City fallback should not be: “Oh well, we will just let individual lane movements, quality of life, and property values keep deteriorating on the side street approaches and neighborhoods.” The realistic planning approach for the City fallback should be: "We will slow major development until we have a remedy to traffic problems, or at least a realistic understanding of future actual conditions."

It is imperative that the current clear and mandatory LOS standards remain in place. They eliminate any confusion and opportunity for abuse or public distrust of the process. They avoid unnecessary litigation and disputes during development approval. They avoid inconsistent outcomes for different developments and neighborhoods. They maintain the status quo until the suggested infrastructure improvements are assessed with neighboring jurisdictions to a level of certainty, one way or another.

<u>The Sector Study's models show current and future failure on Forest Drive. Without the agreement of County and State for desired modifications, there is no plan for the critically needed improvements.</u>

Because the Sector Studies' traffic modeling of current and future conditions [Existing Condition (page C-9) and Improved Condition (page C-30)] both show serious future issues, at both intersections overall and the individual movements of intersections, now is not the time to lower standards, insert vague standards, or to insert unnecessary discretion for when traffic impact mitigation is mandatory or sufficient.

Moreover, because the majority of the proposed infrastructure capacity improvements are at intersections and roadways owned and managed by Anne Arundel County and the State of Maryland, it is especially important that a firm understanding first be developed with those neighboring jurisdictions on the viability and timing of the installation of all the proposed “fixes.” This needs to occur before any well reasoned changes to the City’s APF ordinance and Traffic Impact Study guidelines can occur. State law mandates that both the County and State receive the draft sector study plan since each is “responsible for financing or constructing public improvements necessary to implement the plan.” (See, MD Land Use Code Section 3-203(C)(2). When the Planning Commission submits its final recommended version of this sector study plan to the City Council for consideration and approval, the comments and recommendations from the City and County regarding the proposed public infrastructure improvements are to be included and made public. In short, these neighboring jurisdiction comments are necessary before the final version of the sector study can be presented to City

Council for approval. (See, MD Land Use Code Section 3-203(d). Not having that perspective makes changing development standards premature and ill advised planning.

SPECIFIC QUESTIONS AND COMMENTS

Question D1. As most of the key issues regarding traffic are located along the Forest Drive corridor where the main arterial is controlled by the County, why not consider applying the County Adequate Public Facility traffic process, if not in the entire City, then at least in this portion of the sector?

Question D2. How common in other jurisdictions is the proposed approach for traffic APF whereby individual lane movement failures and un-signalized intersections are not placed into a category of mandatory remediation to remain at D or better?

Question D3. Do these proposals suggest a change from current guidelines for a setting in which an intersection or movement is already at LOS E or F, and new development will worsen the applicable delays? Under the current guidelines, the developer shall aim to maintain the same level of service. What is the City's position in such a setting? This needs to be clarified now in light of the predictions in the Existing Conditions model (page C-9) and the uncertainty over the viability of the proposed capacity improvements.

Question D4. ref. Page D-1: A suggestion is made for a mitigation option list that would identify projects that are a priority to the affected community. The proposal is these could serve as a substitute mitigation proposal.

Please clarify how this works. Is the proposal to the effect that should the development create LOS failures that cannot be remediated back to LOS D, then the developer can do another project elsewhere in the City that helps traffic? If so, how are the type, location and costs of the alternate remediation established?

Question D5. ref. Page D-1: "*Alternative improvements that are within the category for mitigation can be provided. (Example: If an initial traffic study reveals congestion near the proposed project is a high priority but the solutions available for improvement will not significantly alter the congestion, the applicant may offer other measures such as improvements to Transit or Pedestrian/Bike facilities). The applicant should be required to meet a "reasonable standard for improvement" within each major category.*"

Does this approach effectively require citizens in the area of development to suffer worse congestion, but some other portion of the City will see a benefit? This approach is unworkable and will create dissension between neighborhoods and Wards. The

standard to meet a “reasonable standard for improvement” is too vague and will create many disputes and possible litigation. Various decisions as to what meets this vague standard could create appearances of favoritism and public distrust. As an example, every neighborhood will feel a “fix” in their area should have priority. How are the “fixes” to be prioritized?

Question D6. ref. Page D-1 to top D-2: There is a proposal to “Require that site vehicular trip generation estimates reflect a Complete Streets mode emphasis as well as a proposed site mode split data. Permit trip generation estimates to quantify estimated pass-by travel changes such as trip capture and commuter trip reversals.”

It seems that the location, demographics, the degree of implementation, and many other variables impact what benefits accrue from installation of a Complete Streets plan.

D6 a) Are there set industry standards that can be applied within this sector for the trip generation estimates to quantify estimated pass-by travel changes such as trip capture and commuter trip reversals?

D6 b) How is it possible to assess the reasonableness of any particular developer’s or consultant’s estimates?

Question D7. ref. Page D-2: If there is not already coordination on this issue with the County, since so much of the sector’s major arterial is controlled by the County, should TIS work required by the City use the same software or models required by the County? It seems this would enhance the shortening of time frames for assessing traffic impacts and getting County sign off.

Question D8. ref. Page D-2: **re: mitigation standards**. The Sector Study proposes to weaken standards for requiring mitigation. Under current guidelines there is no distinction between signalized intersections and un-signalized intersections. There is no distinction between failure of the overall intersection and failure of individual movements using a LOS determination.

Page 14 of the current TIS guidelines mandate as follows:

> Improvements are required if the roadway, the intersection and/or a particular movement will operate below LOS D or worse with the proposed development. Under this condition, the roadway and/or intersection improvements shall bring the level-of-service to at least LOS D.
>
> Improvements will be required if the roadway and/or intersection will operate at LOS E or F for the horizon year(s) without the proposed development, and will be even worse with the proposed development. In this case, the proposed mitigation shall aim to maintain the same level of delay and ensure safety.

The proposal appears to retain the requirement for mitigation of overall intersection LOS delay only at signalized intersections. At un-signalized intersections, and at

individual lane movements, the standards are now going to be much more discretionary and vague.

As regards individual approaches at any intersection (signalized or not), the going forward proposal seems to be that mitigation is only required "at the discretion of staff." Under the proposal, the staff would look at "critical lengths" for queues and "vital conflict points" which will be decided with the developer for each development. The "vital conflict points" only become relevant if the queues backing up to this point "would be expected to have a significantly adverse on traffic flow through the system." Only then is mitigation going to be required and only "when possible." The lack of objective criteria is unacceptable.

Please respond to these concerns about the Sector Study's proposals to add staff discretion and to remove long established standards for mandatory mitigation. The proposals allow a deterioration in service at individual intersections and individual lane movements which is not allowed today. They allow for inconsistent application from administration to administration and as applied to specific developments. They allow for homeowners and businesses more exposed to non-signalized intersections to see their transportation experience decline over time. These lower standards inherently allow for overall system deterioration, at a time when it still is not known what fixes are implementable. Again, until the proposed capacity upgrades are assessed through at least feasibility studies, if not completed engineering, it is pre-mature to lessen the standards for remediation.

Question D9. ref. Page D-2: It is suggested to "*Expand the list of acceptable mitigation options that may be required or considered by staff and the Planning Commission to include an option to substitute improvements to existing and proposed transit stops, bike and pedestrian routes, and crossings for vehicular circulation improvements.*"

Please explain how substituting roadway mitigation with other non-roadway facilities will not result in traffic deterioration. Such substitution may be reasonable so long as there is not an offsetting deterioration of the system as a whole, or deterioration of particular intersections and movements to level of service E or F. If that deterioration is the result and there is no possible remedy, the development should not proceed. If the development were allowed to proceed, and this same outcome is allowed over and over in the City, then nothing gets accomplished and system wide deterioration continues with no fixes in site, much less possible.

Question D10. ref. Page D-1: "*The applicant is allowed to make a payment (<u>fee in lieu</u>) to an escrow account that can be applied to a mitigation option as identified by staff. Place a time limit on the escrow account to have money used by a certain date or it gets refunded.*"

D10 a) This proposal has the same problems as noted above in Questions D4 and D5,

above. How will neighborhoods throughout the City not be pitted against each other?

D10 b) Furthermore, will the overall traffic system deteriorate if there are many approvals when a mitigation fix is not feasible?

D10 c) How does this proposal mesh with the staff position that it cannot impose mitigation fees on a developer for a fix without a sufficient “nexus” to the actual project being assessed?

D10 d) How will the fee in lieu be assessed, e.g. the estimated cost of the foregone mitigation, or the size of the development in number of residential units or retail/commercial square footage, or what?

SUPPORT FOR PROPOSALS FOR APF MODIFICATIONS

Some of the possible modifications to the Traffic Adequate Public Facilities Ordinance and TIS guidelines are certainly acceptable and necessary to better assess overall impacts to mobility of development. We make the following observations on the proposals.

Question D11, Proposed APF Modification. Mitigation Scoring, Page D-1. “*The proposal analyzes the total impact/benefit to the City. Consider an evaluation approach based on a grading system that scores the total effort offered by the applicant to mitigate the effects of the proposed development and acknowledge the benefits.*”

This added analysis seems beneficial for impact assessment. What does "total effort" actually mean and can it be reliably measured?

Further, a newly failing LOS in the vicinity of the development should not excuse mandatory remediation because of a potential regional improvement. For example, it should not be acceptable to argue that a new retail/commercial/residential development will cause failing LOS, but in the future, if more such development does take place, there may be opportunities for future improved mass transit service which could overcome the expected LOS deterioration. This is risky long term planning, particularly in light of the results of the modeling in this draft sector study.

Question D12, Proposed APF Modification. **City Priorities**, Page D-1: “*City priorities to be implemented over time are identified.*”

This would obviously be a helpful a planning tool.

This draft study seems to have started the list of critical infrastructure improvements with the capacity enhancements identified on pages C-28 and C-29. It is needed as

soon as possible. Many priorities had been identified in the 2009 Comprehensive plan and/or subsequent TIS studies and recommendations, but they have been often ignored.

D12 a) What type of city priorities does this refer to?
D12 b) By when can a list of priorities be prepared?
D12 c) How can the priorities be listed in such a manner as to indicate that they will be implemented?

Comment D13, Proposed APF Modification. **Focus on broadly defined contributions,** Page D-1, "*Another method to modify the APF and guidlines*....":
"*These changes should be consistent with the Complete Streets approach and ensure that future development projects are evaluated against their contribution to the City's transportation performance broadly defined to include safety,transit ridership and cost effectiveness, heavy truck congestion, automobile congestion,bicycle and pedestrian circulation, as well as the existing nature and purpose of the surrounding road network.*"

We support this proposal. It is reasonable and useful to <u>focus developers and consultants on broader transportation issues</u>.

Comment D14, Proposed APF Modification. Traffic Impact Studies must address many mobility options, Page D-1: "*Require development applications to provide traffic impact studies to address adequacy of transit, biking and walking as well as vehicular traffic. Require a multimodal LOS analysis of intersections at staff discretion. Require that a context map be provided that locates the existing street connectivity, transit services, bike and pedestrian routes and major destinations within the vicinity of the development site and identifies relevant gaps and obstructions. The vicinity should include at a minimum a one-mile radius.*"

We support this proposal. It is reasonable and useful to <u>include in TISs an evaluation of a broader spectrum of mobility options</u>.