

Environmental /FCP Comments:

General:

1. A project goal to seamlessly balance environmental preservation and sustainability with the built environment for a senior care facility, was not mentioned in any of the correspondence submitted. Please articulate the sustainability measures proposed,
2. How does the urbanized landscape being proposed mimic the native ecosystem,
3. No information was provided regarding wildlife habitat, either existing or proposed,
4. No information was provided in the physical connection of the proposed institutional use to the natural landscape,
 - a. A great deal of time was spent during conceptual design towards the visual connection. This should be articulated in your submittal,
 - b. Please delineate trails, overlooks and program space areas within the forest area,
5. Please delineate how the development proposal complies with the City's Comprehensive Plan, Environmental Policy Recommendations—especially Policy 1.4 increasing the City's urban tree canopy to 50%,
6. The Forest Stand Delineation (FSD) for The Katherine Properties and Adjacent Parcels was found to be “complete and correct” in a memorandum dated June 16, 2016, by the City's former Department of Neighborhood and Environmental Programs. The City Code notes an approved FSD is valid for five years except that P&Z may require submission of a revised FSD if site conditions change.
 - a. Portions of the approved FSD include field sampling from July, 2010 and November, 2011, and soil evaluation from November, 2011,
 - b. The Department requests that an updated FSD be submitted for the proposed development area only. The delineation shall include all trees with 18” DBH and larger long the periphery and also trees between 2” and 8” DBH suitable for transplanting on-site,
7. Please submit a preliminary soils plan, delineating how existing soils will be retained and utilized on-site,
8. Shift the location of the proposed Wellness House closer to Mas Que Farm Road and away from the stream channel and non-tidal wetland area,
9. Please delineate pre and post drainage area/flows to all non-tidal wetlands. The goal is to maintain current water volumes so as to neither increase or decrease the wetland areas, and to limit pavement/roof runoff with increased water temperatures to the wetland areas (especially within the vernal pool),
10. Please describe the expanded wetland buffers,
11. Please have the Landscape Architect seal sheet C-5.01 & C-5.02,
12. Please delineate and or articulate the comprehensive impacts of the proposed stormwater management design on the watershed,
 - a. Please review possible on-site and off-site (drainage through the site) remedies to the current failing outfalls from the school site and the Newtowne site. Improving these failing scenarios will greatly assist in overall watershed improvement,

Record Plats:

1. Please delineate the require 75 acre annexation, conservation easement,

2. Please delineate the proposed forest conservation easement(s),
 - a. The annexation and forest conservation easements will likely overlap,
3. Please delineate a separate lot for the Wellness House relocation,
4. Please provide draft, written annexation and forest conservation easements,

Road Alignment/Path Extension:

1. The Skippers Lane connection at Spa Road does not align horizontally (arch needs to be increased) or vertically with the future connection to Gemini Drive. The entirety of Skippers Lane extended shall be designed, both horizontal and vertical, from Newtowne Drive to Gemini Drive,
2. Crystal Spring Farm Road shall remain in its current location to minimize tree disturbance,
3. The proposed 10 ft. shared use path shall be extended for the entire property length adjacent to Spa Road with a possible crosswalk at the entrance to Hunt Meadows,

Tree Preservation:

1. The FCP must comply with No Net Loss amendments to the City's FCA,
 - a. Priority reforestation: maximize on-site reforestation, adjacent property reforestation, watershed reforestation, fee-in-lieu,
2. Revise the grading concept on Lot 2, especially in the area adjacent to Forest Drive, to better maintain existing forest. Delineate trees that supplement the existing forest with transplanted material from on-site, to fill-in existing open and invasive species areas,
 - a. Approximately 4 acres of existing forest may be retained and/or supplemented with this revision,
3. Revise the grading on Lot 4 in the areas to the rear of the proposed cottages. Relocate SWM BMP's to the side and front yards. Why is the plan creating meadow in the rear yards within an existing forest? The cottages should appear as if they set against the existing forest,
 - a. Shift all cottages forward to within 25'-30' of the proposed loop drive,
 - b. Approximately 1 acre of additional forest may be retained with this revision,
4. Revise the grading on Lot 5 to shift the cottages forward towards Skippers Lane and Crystal Spring Farm Road to within 25'-30' of the R/W, thus creating increased forest preservation in the rear (be certain the rear-loaded units accommodate an 18' driveway),
 - a. By lessening the side yard setbacks between units, Lot 5 can feasibly accommodate the three cottages units from Lot 3,
 - b. Approximately 2 acres of additional forest may be retained with this revision,
5. The architecture plans for the independent living (IL) building indicates a small amount of green roof, yet no green roof design appears in the SWM calculations,
 - a. Both IL building and Maison Court buildings have significant flat roof area to support green roof systems. Utilizing and maximizing green roof BMP's has the potential of reducing ground-level BMP's, thus reducing forest clearing,
6. The proposed storm drain piping to the pond outfall shall be directionally bored under all existing forest areas,
7. The Tree Removal Plan, sheet C-5.02, notes the removal of trees A14, A22 and #52, but these trees are not listed in the Significant Tree Removal Table,

Significant Tree Removal Variance Request, letter dated December 14, 2018 from Wetland Studies and Solutions, Inc.:

1. Paragraph one notes a variance request for the removal of 59 significant trees. This number does not correspond to the 75 trees noted for variance on sheet C-5.01,
2. In paragraph two, please explain why (1) poor condition tree requires a variance and which tree number (exceeds 30" DBH),
3. Comment B. (2) please give examples of similarly zoned properties with similar conditions and similar locations. The Village at Providence Point is a rather unique property for the City of Annapolis,
4. Comment B. (3) please detail how preservation of the trees requested for variance would thwart the applicant's ability to develop the site using smart growth principles,
5. Comment B. (4) please expand upon how the variance request is not based conditions or circumstances which are the result of actions of the applicant (limitations of the site based on other regulated environmental features),
6. Comment B. (5) please explain how or why the request does not arise from conditions on neighboring property,
7. Comment B. (6) please describe in detail how the practices proposed will prevent adverse effects on the immediate area and the watershed in general. To reiterate, correcting current failing stormwater outfalls should be part of the water quality analysis, protection and improvement,

Justification for Disturbing Priority Forests and Priority Areas, letter dated December 14, 2018 from Michael J. Klebasko, P.W.S.:

1. Page 1, Executive Summary, paragraph 1; please add the Annapolis Environmental Commission after With direction from City staff,
2. Page 2, Existing Site Condition, paragraph 1; please add Wellness Center to features of the overall property,
3. Page 2, Existing Site Condition, paragraph 2; notes 266 significant trees. This number will likely change with the newly requested delineation,
4. Page 2, Existing Site Condition, paragraph 3; please change City staff provided NRI to NRI approved with the FSD and include Pitchford delineation included high, medium and low priority areas,
5. Page 2, Project History, paragraph 1; please explain in detail how the design of this new Senior Living community relates to the existing fabric of the adjacent community and provides a cohesive connected community,
6. Page 3, Project History, paragraph 3; It doesn't matter what the original Crystal Spring project proposed, this is a completely new application. Please remove the paragraph,
7. Page 3, *i. How techniques for forest retention have been exhausted*; please change Project area to entire, contiguous forest area, as the FCP includes the property, not just the project area,
8. Page 4, *i. How techniques for forest retention have been exhausted #1*; please provide details and examples of how applicant relocated proposed development away the most environmentally sensitive areas,
9. Page 4, *i. How techniques for forest retention have been exhausted #2*; please change identified by City staff to identified on the NRI and Pitchford Plan and explain the minimum space needed for the proposed project,

10. Page 4, *i. How techniques for forest retention have been exhausted #3*; please add Complete Streets after Smart Growth to indicate the all of the principles used in road design to assist in minimizing forest clearing,
11. Page 4, *i. How techniques for forest retention have been exhausted #4*; please adjust language to note Skippers Lance location as directed by the City of Annapolis Comprehensive Plan, and also note the IL Building size was reduced 30%,
12. Page 4, *i. How techniques for forest retention have been exhausted #5*; add wetland buffers maintained in excess of 100 ft.,
13. Page 4, *i. How techniques for forest retention have been exhausted #6*; please note how many of the 266 significant trees will be preserved in the noted area, and explain in detail how the Maison Court and cottage buildings are preserve said significant tress to the greatest extent practicable, and why can't the these buildings be adjusted or removed to save additional trees,
14. Page 4, *i. How techniques for forest retention have been exhausted #6*; the last sentence notes how the Maison Court building locations were adjusted to avoid clearing in the northeast corner, however the grading design in this area does not respect the Forest Drive buffer (revise the grading noted above and revise this statement),
15. Page 4, *i. How techniques for forest retention have been exhausted #7*; please add as identified on the Pitchford Plan, and explain in detail how the location of the cottages preserves or guarantees preservation,
16. Page 5, *i. How techniques for forest retention have been exhausted #8*; eliminate where possible and feasible from the beginning and eliminate where practicable from the end,
17. Page 5, *i. How techniques for forest retention have been exhausted #9*; please add hydric soils and major existing drainage areas to list of environmental features avoided by the proposed design,
18. Page 5, *i. How techniques for forest retention have been exhausted #10*; this paragraph notes green roofs as a SWM feature, yet pages 7 & 13 of the SWM Report note 58 surface micro-bio & 13 structure plantings and no green roof (green roofs shall be utilized to the maximum extent), and also correct that the project will comply with new 125% ESD volume (hopefully exceed),
19. Page 5, *i. How techniques for forest retention have been exhausted #11*; please note the IL Building footprint was reduced 30%, also please explain how the IL Building stacks dissimilar uses at the main levels in effort to reduce the overall footprint,
20. Page 6, *i. How techniques for forest retention have been exhausted #11* (Cottage/Duplex/Maison Court); Please note how many cottage, duplex and maison court units were relocated the IL building,
21. Page 6, *i. How techniques for forest retention have been exhausted #11* (Cottage/Duplex/Maison Court); this paragraph notes that the majority of the cottage units were change to front-loaded garages, when in fact they were all originally front-load and the City requested rear-loaded garages—please correct,
22. Page 6, *i. How techniques for forest retention have been exhausted #12*; as previously noted, the cottages units shall be graded as if the units were dropped into the forest, thus explain in detail the grading technics used to minimize clearing,
23. Page 6, *i. How techniques for forest retention have been exhausted #13*; please note the number of acres dedicated in forest conservation easements,

24. Page 6, *ii*, *Why the priority forest and priority areas cannot be left in an undisturbed condition*; please disregard the “project area” and articulate why within the entire 175 acre site priority forest cannot be left in an undisturbed condition,
25. Page 6, *ii*, *Why the priority forest and priority areas cannot be left in an undisturbed condition*; being inconsistent with similar types of projects in the State does not justify priority disturbance within Annapolis under the City’s FCA,
26. Page 7, *ii*, *Why the priority forest and priority areas cannot be left in an undisturbed condition*, paragraph 2; please define “standard practices” and their application in reduced priority forest clearing,
27. Page 7, *ii*, *Why the priority forest and priority areas cannot be left in an undisturbed condition*, paragraph 2; please explain, in detail, upon how the applicant will meet “all” FCA requirements on-site,
28. Page 7, *iii*. *How the disturbance to priority forest and priority areas qualifies for a variance*; please explain the numerous iterations of the CCRC master plan and their ability to avoid the most sensitive areas and to maximize forest preservation,

Further comments to be continued relating to Code compliance, site design and architecture