



June 16, 2016

Delivery By Electronic Mail

Mr. Thomas J. Stosur, Director
Baltimore City Department of Planning
417 E. Fayette Street, 8th Floor
Baltimore, MD 21202
plan@baltimorecity.gov

Re: Port Covington Master Plan - Comments of ACLU of Maryland and Public Justice Center

Dear Mr. Stosur:

Thank you for the opportunity to submit comments on the proposed Port Covington Master Plan.

The ACLU of Maryland and Public Justice Center have a long record of working toward racial equity in housing, education, criminal justice, and opportunities for youth in Baltimore City. That experience informs our evaluation of the Port Covington proposal. Our evaluation is also based on careful analysis of the Tax Increment Financing Application, FastLane Application, and Memoranda of Understanding executed by the City and the master developer, Sagamore Development Company, the real estate arm of Under Armour CEO Kevin Plank. While we understand that only the Master Plan and related urban design and land use issues are currently before the Planning Commission, those issues must be evaluated in context and informed by information gleaned from other publicly available documents. This is especially the case given the rather surprising lack of detailed substance and data contained in the Master Plan itself.¹

We begin our comments with an overarching analysis of the Port Covington project, before commenting on specific sections and issues. We conclude with recommendations as to what a Master Plan worthy of our City and of our public investment might look like.

I. The Port Covington Master Plan is an example of the economic development paradigm that has failed our City and should not be endorsed by the Planning Commission in its present form.

‘We will build it together...’ is the Port Covington claim.

What we should be building is a 21st Century model for the nation of how an old, rust belt, racially and economically segregated city can create a brand new racially and economically diverse community and an economic engine that generates inclusive growth and shared prosperity. We should show that Baltimore has learned a hard lesson: that the

¹ The Master Plan itself contains very little substantive information about the planned uses for

existence of “two Baltimores” — one empowered, wealthy and thriving, the other still redlined and marginalized – is no longer sustainable. The existence of “two Baltimore’s” has crushed a significant number of our fellow Baltimoreans, and undermines growth and economic mobility for us all.

The new paradigm in economic development is focused on *equitable* growth, making sure that tomorrow’s cities are just and inclusive ones, “meaning cities that put people first, and put equity and social justice at the center of policy and design,” as described by the Ford Foundation, the Brookings Institution, the National League of Cities and mayors from around the United States and the world:

These aren’t just nice ideas. If cities are not inclusive and built for and by everyone, they will simply fail to thrive. As we have seen in cities across the US in the 20th century, top-down urban planning, metros built for cars and not people, and exclusionary zoning practices have led to severe disinvestment and racial and economic segregation, among other injustices.²

This understanding of inclusive growth is reflected in the yearlong series of discussions spearheaded by the Planning Department’s professionals on equity planning, examining how to move our city from segregation and inequality to inclusion and shared prosperity. That series was recently capped off with a call for new approaches to economic development and new outcomes to close the wealth and income gaps.

But as it stands now, the Port Covington Master Plan is a prime example of structural inequality on a massive scale — and of the same old waterfront focused economic development approach that hasn’t worked to reverse Baltimore’s decline, and may have contributed in fact to the disinvestment in other neighborhoods. While “big and bold”, the vision is decidedly limited and old school trickle down economic development.

In the hope of building a stronger tax base and receiving increased tax revenues in the long distant future, a waterfront site will be developed at public risk and expense:

- A speculative real estate venture in which the developer buys cheap, unimproved industrial land, with plans to turn around and sell development parcels to vertical developers once they are rezoned and infrastructure is installed, retaining all the value added by the rezoning and publicly financed infrastructure;
- A brand new racially and economically segregated city within the city, a virtual gated enclave, inhabited by millennials and empty nesters making an average income of \$100,000;
- Instead of middle wage jobs for which city residents can qualify and which are the priority of city and regional workforce plans, the Port Covington project is expressly targeted to attract a ‘high wage employment’ as a waterfront destination

² Stefan Norgaard, *Why We Need to Build Inclusive Cities*, Ford Foundation, Equals Change Blog, June 2016, <http://www.fordfoundation.org/ideas/equals-change-blog/posts/why-we-need-to-build-just-and-inclusive-cities/>

for the creative class: “highly educated millennials and Baby Boomer residents seeking a high quality live-work-play environment”;³

- Although Baltimore City is being asked to support the project with \$660 million in TIF financing and rezoning of scarce industrial land, the jobs created will primarily be held by residents of the suburban counties, with only 32.9% of permanent jobs expected to be held by city residents;⁴
- A new entertainment district with low wage retail jobs (the TIF projects annual wages of only \$26,745 for retail FTEs);
- In a city that can not afford to maintain the parks it already has or to keep recreation centers open, Sagamore will use TIF financing to build new parks designed as amenities for the future residents and office workers and to add value to the parcels Sagamore will sell for vertical development.

Moreover the vague and difficult to enforce Memoranda of Understanding signed by the developer with the City are mere tokenism in the context of the customized spot re-zoning and massive public financing requested by the developer:

- A pledge from the developer to ‘strive’ to employ an even lower number of City residents (20%) and to strive to fill only 51% of new hires with city residents;
- A pledge to comply with only the City’s usual MBE/WBE goals; and
- Failure to comply with the minimal standards of the City’s Inclusionary Housing law, promising only to try to include a reduced number (10%) of affordable housing units, affordable at 80% of AMI, far above the pay grade of retail workers and most Baltimore residents.

II. Comments on Specific Elements of the Master Plan

Land Use and Built Environment: Residential

The dominant element of the Port Covington Plan is the residential component, originally projected in the TIF at 5,329 units, then ballooning to 7,500 units, and finally orally announced by Sagamore’s representative at the Master Plan hearing to have grown still further to a request for zoning that will allow 14,000 units. Despite its massive size and importance, The Master Plan does not have a section on the residential component, and tells little or nothing about the planned residential uses, including its number of units.⁵

³ Sagamore Development Company. (2016). *Tax Increment Financing Application*. (p. 43).

⁴ Sagamore Development Company. (2016). *Tax Increment Financing Application*. (pp. 445, 473, 501, 527). The Local Hiring MOU is actually less ambitious than the TIF financial projection, requiring that the developer ‘strive’ to meet a goal of only 20% of on-site jobs to be held by City residents.

⁵ The Master Plan itself contains very little substantive information about the planned uses for which rezoning is sought. This includes a lack of information about job generation and local hiring, as well as the target market and affordability of residential uses. In contrast, we learn on p. 23 that Red Twig Dogwood and Northern Bayberry will be planted along sidewalks in “micro bio-retention areas.”

At even the lowest number, this is the massive building of a city within the city.

From the financial projections in the TIF application, we know that Sagamore envisions virtually all of the units will be in high rise apartment buildings with mostly small, studio and one-bedroom units, renting for \$2,600/month to single individuals or couples with an average income of \$100,000/year, the highly educated millennials and empty nesters referred to earlier.

This is hardly a blueprint for a new community that is inclusive by race/ethnicity, income, familial status, ability, or stage of life. To the contrary, it is an exclusive enclave, which will perpetuate Baltimore's racial and economic segregation. Due to its design and isolated geography, it will be a virtual gated community for affluent whites without children. Baltimore does not need another segregated enclave; it needs to break down the hyper-segregation that has been holding it back from reaching its potential as a global port city. And the City's fair housing and Title VI obligations require it to create inclusive, integrated communities — and do not permit the City to provide financing and zoning approvals to create another segregated white enclave.

Moreover, there is no indication that market studies were performed supporting the Master Plan, and in particular showing such a high level of residential demand.⁶ This is of critical importance, first to assess the market risks, success of the project, and likelihood of repayment of the bonds, and second, to offer assurance that leasing at Port Covington will not be cannibalizing the market in other neighborhoods.

Instead of data derived from market studies, there is less than a page labeled “market analysis” that is devoid of data and little more than vague generalities and catch phrases about “seven broad trends in urban economics and real estate.”⁷ The developer assumes that national demographic trends such as “re-urbanization of population and jobs” will support the marketability of 7,500-14,000 new apartment units, a scale far greater than has been evident in Baltimore to date. Moreover, some demographers and experts in the multifamily industry have started to question whether we have already reached “peak millennial” and whether the demand by baby-boomers for urban living has been overestimated.⁸ We do not know, and neither apparently does the developer.

Amendments to Transform Baltimore: From the discussion of massing, we can surmise that the bulk of the 7,500 or 14,000 residential units will be in massive apartment skyscrapers abutting I-95, an extreme density that exceeds not only existing zoning categories but also the proposed new zoning code, Transform Baltimore. As a result, the

⁶ The lack of any market study is quite surprising because they are standard in the real estate industry --- and required by any lender for financing. In fact, the projections for repayment of the TIF are highly dependent on the successful build out, and leasing, of the apartment units. If demand proves to be less than anticipated, it will present a serious risk of default on the TIF bonds.

⁷ Sagamore Development Company. (2016). *Port Covington Master Plan Draft*. (p. 43).

⁸ “Have U.S. Cities Reached ‘Peak Millennial?’” CityLab (March 16, 2016); “Baby Boomer Mass Migration, Fact or Fiction?” Multifamily Executive (June 8, 2016).

Master Plan contemplates that the City will amend Transform Baltimore, upzoning the site to eliminate all height restrictions to fit this developer's vision.

Human scaled residential buildings, of the type that would be most attractive to families with children (missing from a previous draft), we are now told will all be located in the West End, across arterial Hanover Street from the core of Port Covington and the new amenities. This segregation by housing type will result in segregation by familial status and race.

Implementation: In the Master Plan, Sagamore describes itself as the Master Developer for the project (Master Plan p. 52). As more fully described in the TIF allocation, Sagamore does not intend to be the vertical developer for the mixed-use components (housing, retail, entertainment, and non-Under Armour office space). Once development parcels are rezoned and the horizontal land development is complete, Sagamore intends to sell the parcels to other developers. (Master Plan p. 52). At this point most of the value in the land will have been created by the public action — through upzoning of land purchased as cheap industrial land, and by public financing of most of the costs of improving the land (streets, water and sewer, lighting, nearby park amenities, etc.).⁹

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On the land use side alone, the upzoning and repeal of the Urban Renewal plan and existing PUD will allow extraordinarily high levels of density and value added. For example, the amendment to Transform Baltimore will eliminate any height restriction on residential properties in the north central portion of the site where the scale and massing section of the Master Plan shows towering skyscrapers where residential uses are not even currently permitted. (Port Covington East PC-2, p. 38).

As the deal is now structured, Sagamore intends to retain that profit for itself and not to use the portion generated by public action and investment toward the outstanding balance on the TIF bonds. In our view, that is an unacceptably risky and bad deal for City residents. To the extent that profits are not needed or used to pay down the TIF, the City should recapture the value created by public action and use it for public purposes, such as cost-offsets for inclusionary housing on-site and a contribution to an Affordable Housing Trust Fund.

Inclusionary Housing: At the public hearing on the Master Plan, Housing Commissioner Paul Graziano testified that he had already granted a waiver of the City's Inclusionary Housing ordinance, exempting Sagamore from compliance. The City subsequently executed an MOU that requires much less — only 10% of affordable units to be affordable at 80% of AMI.

In the first instance, it must be recognized that the Inclusionary Housing law establishes a city policy of inclusive development, and sets a floor, not a ceiling, for inclusion of affordable units. Regardless of the existence or terms of that law, where the City is offering financing or other assistance to a developer, it retains full power to set a higher

⁹ Sagamore Development Company. (2016). *Tax Increment Financing Application*. (p. 22). Private sources account for less than 23% of the land development budget, with the TIF and state/federal transportation grants the rest.

bar as a term or *quid pro quo* of providing the assistance. A TIF is not an entitlement, it is supposed to be a negotiated arrangement to serve public purposes. That said, the action of the Commissioner was contrary to the public policy underlying the Inclusionary Housing law and its express terms:

- Where the City is providing a “major public subsidy”, re-zoning, or significant land use authorization, these public actions create value for the development, and thus trigger requirements to include either 20% (major public subsidy) or 10% (rezoning, land use authorization) affordable units;
- The law specifically deems a TIF to be a “major public subsidy”, which requires 20% affordable units; and
- A major re-zoning requires 10% affordable units.

In various tweets and public statements, Sagamore has stated that the City law required an exemption because there is no money in the Cost Offset Fund to make the developer whole. But the City Inclusionary Housing law does not say that the source of additional funds to fill this gap are limited to the Offset Fund or any other particular source.

As a first step, the City IH law and regulations require the Housing Commissioner to consider “all aspects of the project” and “the total amount of public subsidy and other incentives provided to the project” and to determine whether the major public subsidy is sufficient to offset fully the financial impact to the developer of providing 20% affordable units (IH §2.5). In addition, in the case of a re-zoning, the City inclusionary housing law requires the Commissioner to consider whether to provide an additional density bonus of 20% to off-set the cost of providing affordable units. The Commissioner is required to make a finding that the project would not be economically feasible if it provided the number of affordable units required even if the project received a density bonus. (IH Reg. § 2.5(b)). The Commissioner made no such determination of feasibility before granting the waiver.

In this case, it appears that the analysis was performed by Sagamore and provided to the Housing Commissioner.¹⁰ Several aspects of Sagamore’s analysis failed to follow the law.

- At the first stage, the analysis relied on by the Housing Commissioner failed to consider the value to the developer of both the major re-zoning and the \$660 million TIF subsidy.
- The analysis made no determination as to whether the major public subsidy itself (i.e. the TIF) is sufficient or insufficient to offset the financial impact of providing the affordable housing, and if insufficient the amount of the gap.

¹⁰ The Sagamore employee who performed the analysis, Michael Pokorney, was until recently employed by the Housing Department where he was the sole person responsible for implementation of the City’s IH law. His position does not appear to have been filled. The contact person noted on the letter from Housing Commissioner Graziano to Mr. Pokorney granting the exemption is actually an employee of the HABC Housing Choice Voucher program.

- Had this been considered there may not have been a gap, or it would have been small, in light of the extraordinary amount of the TIF subsidy, plus the substantial value bestowed on the developer by the rezoning and other public subsidies.
- Instead, the analysis merely calculated that the cost of providing 20% affordable units in compliance with the law and considered that full amount to be required to make the developer 'whole.'

The analysis provided to the Housing Commissioner by Sagamore also erred at the next step. If the TIF, other subsidies, and rezoning are found to be insufficient, the Housing Commissioner is then required to determine whether the City can provide additional funding to fill the gap and off-set the financial impact of providing the affordable units.

- The Commissioner's waiver analysis did not include any consideration of whether other funds were available to close the gap. In fact, other funds are available, as indicated by the Commissioner during his Planning Commission testimony when he referred to the use of Housing Choice Vouchers (presumably to provide deep rent subsidies to households with incomes at or below 30% of AMI). In addition, HABC has development funds that it can use flexibly to subsidize the development of units for very low-income households.

The Sagamore analysis also erred at the 3rd stage of the analysis, at which the cost offsets intended to fill the gap are capped at certain amounts ("investment thresholds") set out in the law.

- Because the analysis had already erroneously failed to consider the value of the TIF and rezoning, it assumed that none of the TIF (or major public subsidy), or upzoning, would defray the cost of producing affordable units, and the calculation of the gap was greatly inflated.¹¹ Thus, the needed cost-offsets were determined to exceed the cap or 'investment thresholds.'
- It also artificially inflated the gap by basing it on the calculation of a lifetime (30 year) rent subsidy for all of the affordable units, at a cost of \$184 million overall, instead of capitalizing a write down. Moreover, the analysis ignored the availability of housing vouchers to provide rent subsidies for the lowest income tiers.
- As a result, the Commissioner erroneously concluded that the "Inclusionary Housing requirements for this project exceed the allowed threshold amounts...and the project is therefore exempt."

The MOU falls far short of compliance with the City inclusionary housing law despite the project receiving both the major public subsidy in the unprecedented amount of \$660 million, and in addition, the substantial benefit of upzoning that will greatly enhance the value of the property. The MOU entered into by the City and the developer in lieu of compliance with the City inclusionary housing law is vague and contingent on receiving

¹¹ It also artificially inflated the gap by basing it on calculation a lifetime (30 year) rent subsidy for all of the affordable units, at a cost of \$184 m. overall, instead of the capital cost to build the units.

state LIHTC funding and only requires 10% of the units to be affordable to households at or below 80% AMI, with no provision for households at lower income tiers required by the City inclusionary housing law. It does not require the developer to provide affordable units in the event it is not able to obtain competitive 9% LIHTC subsidies. To the extent it receives those subsidies, LIHTC units will not be built in other localities – thus, there is no increase in the supply of affordable housing.

Civic Uses – Schools

The vision of a healthy and prosperous community must include a plan for education. The development must transcend the ideals and policies of the past, which are reflected in Baltimore’s current racially – and economically – isolated schools. We know based on research and case studies, the best outcomes for students — wealthy and poor, white and black — are achieved in communities and schools that are racially and economically diverse.

Surprisingly, schools seem to be an after thought in the Port Covington Master Plan and proposal. While the Master Plan is silent on the number of children expected to reside at Port Covington if fully built out, the TIF application estimates that the City and the Baltimore City Public School System will need to provide some 884 new children with education services.¹²

The developers seemed to assume that any children living on the site would be absorbed by schools in neighboring communities, without looking at enrollment projections for those schools or consulting with BCPSS (Master Plan p. 40-41), adding a school site only at the prodding of Planning staff.¹³ (We question whether the air quality at that site, in the West End near the intersection of I-95 and Hanover Street, makes it appropriate for schoolchildren).

Planning is essential to have a positive impact on current area schools – are additions at existing neighborhood schools the best solution? Will a new school be required? How can any overcrowding in nearby schools be addressed through a new school building or rezoning should any of those alternatives be required.

The developers should be required to work with City Schools to put forward a plan that furthers racial and socioeconomic integration that will benefit the students in the new development as well as students in nearby school zones. Should the school system determine that a new school is needed to serve the influx of students, developers should be required also to provide a portion of their TIF bond proceeds to fund construction of a new traditional school in the area. The same requirement for a plan for racial and socioeconomic integration in the new school should be required.

In addition, we have serious concerns about the effect of the massive Port Covington TIF on State education aid to City Schools. If the development comes to fruition, it will

¹² Sagamore Development Company. (2016). *Tax Increment Financing Application*. (p. 56).

¹³ Alternatively, the developers may have assumed children would attend private, parochial or charter schools, as suggested by one news report.

increase the City's wealth, leading to decreases in State education aid. But where the State sees the City's increasing wealth as a reflection of its ability to increase local education aid, almost all of the taxes generated from the Port Covington development will go to cover the cost of TIF bonds. Over the last two years, the ACLU and allies have fought hard to restore over \$20 million in state education cuts, a significant portion of which was due to an increase in the City's wealth, in both income and property. In the first 10 years alone, Port Covington could cost the school system over \$14 million in State education aid.

It is true that House Appropriations Committee Chair Del. Maggie McIntosh helped to put in place a temporary measure to hold the city harmless to decreases in State education aid due to TIF-associated property value increases. It is also true that consultants are currently reviewing the State's education funding formula, and have been directed by the legislature to look at the impact of economic development financing on low-wealth jurisdictions like the city, and propose potential solutions. But, the developers must agree to a binding "hold harmless" agreement to make up any potential loss in State education aid as a result of Port Covington's increased property wealth should a permanent solution not pass at the State level in future years.

Parks and Open Space

The Master Plan proposes 40 acres of parks and open space (Master Plan, p. 51). We calculate that about 27% of the TIF (more than \$140 million) will be used for parks, green space, and related amenities like the 'archeological pier' rather than typical infrastructure like streets and sewers. According to the TIF application, the first series of bonds scheduled to release in June of 2017 will cover \$49 million of public improvement costs for three new public open space areas in Port Covington.¹⁴ The costs financed by the TIF bonds for these three projects is more than three times greater than the city's current capital allocations for all of its parks and recreation facilities.¹⁵ While these facilities will no doubt be pleasant amenities for those who will "live, work, and play" at Port Covington, the cost/benefit calculation for residents of the City as a whole is much less certain.

The parks will be turned over to the City to maintain these expensive amenities, but because they will be city-owned, Sagamore and the vertical developers will pay no property tax on the acreage.¹⁶ Both the Master Plan and TIF application are silent as to who will be responsible for maintaining the parks and open space on an on-going basis, but seem to assume the City will be responsible.

In the face of a declining budget, the City's Department of Parks and Recreation has struggled over the past decade or more to maintain the park and recreation facilities it

¹⁴ Sagamore Development Company. (2016). *Tax Increment Financing Application*. (p. 150).

¹⁵ City of Baltimore. *FY 2016 Summary of the Adopted Budget*. (pp. 224, 228). The amount of public improvement costs financed by the TIF bonds also exceeds the City's current operating budget for park maintenance, recreational facilities, and events.

¹⁶ Sagamore Development Company. (2016). *Tax Increment Financing Application*. (pp. 464-65).

already has in its inventory across the city. It has had to close recreation centers badly needed by Baltimore's youth, and turned parklands like Lake Roland and Ft. Smallwood over to neighboring counties to operate.

The construction and maintenance of these new parks was not contemplated as a priority for the City. As noted in the Master Plan, these new parks are not included in the Parks Master Plan and would require amendments to that plan. (Master Plan, p. 51). It is likely these spaces will require a high degree of maintenance in light of their surrounding high end uses. We are concerned this is not affordable for the City and will divert resources from neighborhoods with greater needs. Instead, these parks and green spaces will primarily serve as amenities that enhance the value of the Under Armour properties and those of the owners of the office space, apartments, and retail uses and their tenants. The Commission should, therefore, recommend that the developer retain ownership of the green space, paying taxes on it and maintaining it. In consideration for the fact that public financing will cover 77% of the land development costs, including the parks and other green spaces, these spaces should remain open to the general public.

A more fundamental question exists as to why such a substantial portion of the TIF (27%) should be used to build park amenities when uses of equal (or arguably greater) public purpose are currently left out of the budget and receive no TIF proceeds? This includes affordable housing — a legal requirement — as well as civic uses such as a school and fire station. The Planning Commission should recommend that the developer contribute more to build the open space amenities, and/or, seek funding from alternate sources such as Program Open Space.

Multi Modal Transportation

The state's FastLane application to the federal Department of Transportation cites the employment needs of West Baltimore residents in making its case for \$76 million to improve access from I-95 to/from Port Covington.¹⁷ However, this section of the Master Plan indicates that the I-95 interchange improvements that are the gist of the "FastLane Phase I" application are designed to facilitate access to Port Covington from the south, i.e. Anne Arundel and Howard counties, and the DC metro area. (Master Plan, p. 50).

We see nothing in the Master Plan that addresses connectivity to West Baltimore, the part of the City and its people most in need of better job access. There is a vague discussion of transit (Master Plan, p. 25) noting only the "potential to add additional local and express MTA routes as well as Baltimore City Circulator buses." But here again, transit access does not seem to have been thought out — we learn more about bicycle access than buses. Moreover, it appears that whatever transit improvements result will have to be paid for out of unidentified public sources, uses that could place Port Covington in competition with disinvested parts of the City or connectivity to other job centers of the region (Master Plan, p. 50):

¹⁷ Maryland Transportation Authority. (2016). *FastLane Application*.

“Separate coordination will be required between BCDOT and MTA regarding proposed infrastructure improvements to MTA transit facilities within the development. Separate funding mechanisms will be utilized in order to implement these proposed improvements.”

Similarly, both the Master Plan and TIF are silent as to desperately needed improvements to the Hanover Street Bridge, the connection between Cherry Hill and Port Covington. Yet here too, the FastLane application relies heavily on the needs of the low-income African American population of Cherry Hill for job access to make the argument that the federal grant will promote equity for disadvantaged populations and racial minorities.

III. Civil Rights Reviews

In planning this new ‘city within a city,’ the City, State and developer should be conducting Fair Housing, Environmental Justice Review, and Title VI reviews to guide the planning and to assure the engagement of low-income and minority populations. Our review of the Master Plan and the other Port Covington planning documents so far made available (the TIF application, the MOU’s, and the federal FastLane application) reveals a lack of compliance with the substantive or planning requirements of Title VI and Title VIII that are triggered when projects are applying for federal funds, or when federal grantees, such as the City and State, are involved.

IV. What would a Master Plan worthy of our investment look like? Equitable Growth and Shared Prosperity

As the events of April 2015 demonstrated, Baltimore will continue to suffer decline and further instability unless we shift our priority from public investment in private real estate deals to investments in:

- the human capital of our people; and
- improvements in their quality of life and upward mobility.

The Port Covington project could be designed as this kind of investment of our \$660 million. But it is crystal clear that it was not.

The ACLU of Maryland and Public Justice Center calls on the Planning Commission to recommend that the Port Covington Master Plan be sent back to the developer with direction to conduct the required civil rights reviews, to authentically engage with disadvantaged groups and a broad array of stakeholders and communities, and to pursue more inclusive and less discriminatory alternatives, ones with bigger benefits for the people of Baltimore City. Such a plan would include, at minimum, a Community Benefits Agreement with the neighboring Cherry Hill and South Baltimore Communities, strong and binding local hiring and training requirements, robust opportunities for small disadvantaged businesses and those owned by minorities and women, strong connectivity to provide job access to economically distressed neighborhoods, and the following specific elements:

- **Build a truly inclusive and diverse community where families and children can thrive, not just high rise studio and one-bedroom apartments for millennials with no children and an average income of \$100,000, as depicted in the Master Plan and TIF application;**
- **Residential units on the Port Covington site must be affordable at the full spectrum of income levels in the workforce and City, including food prep workers, janitors and retail clerks, home health aides, daycare workers, construction workers, carpenters, nurses aides, carpenters, teachers, firefighters, plumbers, and disabled persons. To ensure this diversity, at least 25% of the units must be affordable at or below the workforce housing level (60% of AMI), and half of those units must be affordable to households with incomes at or below 30% of AMI. The housing must be affirmatively marketed to attract a racially and ethnically integrated community, not one that simply replicates existing patterns of segregation in Baltimore and the virtually all-white Locust Point peninsula;**
- **As authorized by the City Charter, a portion of the \$660 million TIF proceeds, as well as a substantial portion of profit derived from the rezoning, should be used to provide affordable housing. While it is reasonable to use 4% Low Income Housing Tax Credits (LIHTC), housing vouchers, and housing program funds controlled by the City and HABC to fill financing gaps, it is not acceptable to deplete Maryland's small allocation of highly competitive 9% LIHTC to build affordable housing instead of a portion of the TIF and profits created by the rezoning. A portion of the profits generated by the rezoning should also be recaptured and placed into a Baltimore City Affordable Housing Trust Fund for use in other locations;**
- **Create a Baltimore City Affordable Housing Trust Fund. To the extent that 'value recapture' from public actions and investments such as the rezoning and TIF is in excess of on-site affordable housing needs, the excess should be placed into the Trust Fund;**
- **A binding "hold harmless" agreement from developers to make up any loss of state education aid due to the increasing property values of Port Covington, thus protecting public education funding;**
- **Work with City Schools to put forward a plan that furthers racial and socioeconomic integration in schools that will benefit students in the new development as well as students in nearby school zones;**
- **A Good Jobs guarantee with family supporting wage standards and full time work, enforceable, verifiable commitments to filling at least 51% of jobs generated at Port Covington with city residents (including low income populations and year round youth hiring), not the 33% projected by the TIF application, and apprenticeship programs;**
- **Exceed the City's usual MBE/WBE requirements; and**
- **Middle wage job creating investments like an Under Armour manufacturing facility, whether on-site or in a disinvested area of the City like West Baltimore.**

The success of these principles must also be inextricably linked to a democratic process that is transparent at every juncture and provides for real community engagement.

While the proposed Master Plan and tax-increment financing (TIF) plan does not currently accomplish these goals, we believe there is still potential for Port Covington to chart a new path for Baltimore. With a complete change in permitted land uses and massive public subsidies constituting the 77% of the capital investment needed for land development in Port Covington, we should all have an historic opportunity to build it together --- and to get it right.

Yours truly,

Barbara A. Samuels
Managing Attorney–Fair Housing

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MARYLAND

C. Matthew Hill
Staff Attorney–Public Justice Center

Monisha Cherayil
Staff Attorney–Public Justice Center

D’Sean Williams-Brown
Law Clerk–ACLU of Maryland

Woods, Tamara

From: Planning, General
Sent: Wednesday, June 22, 2016 12:01 PM
To: Woods, Tamara
Subject: FW: Bikemore Comments on Port Covington Master Plan

Laurie Feinberg

Our Mission: To build Baltimore as a diverse, sustainable and thriving city of neighborhoods and as the economic and cultural driver for the region.

From: Stosur, Tom
Sent: Tuesday, June 21, 2016 8:36 AM
To: Jed Weeks
Cc: Planning, General; hillm@publicjustice.org; cherayilm@publicjustice.org; Liz Cornish; nethercutj@publicjustice.org; samuels@aclu-md.org; Woods, Tamara; Feinberg, Laurie
Subject: Re: Bikemore Comments on Port Covington Master Plan

Thank you for sharing your comments.

Tom

Sent from my iPhone

On Jun 20, 2016, at 3:30 PM, Jed Weeks <jed@bikemore.net> wrote:

Director Stosur:

Please see the attached comments from Bikemore in reference to the Port Covington Master Plan.

In short, we support the commentary from our colleagues at the ACLU of Maryland and the Public Justice Center, but have numerous additional concerns around the half-billion dollars of proposed investment in this project that directly prioritizes automobiles over people.

Please let me know if you have any questions, and thank you for the opportunity to submit comments.

Jed Weeks

--

Jed Weeks
Board President



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June 20, 2016

Delivered via email

Mr. Thomas J. Stosur, Director
Baltimore City Department of Planning
417 E. Fayette Street, 8th Floor
Baltimore, MD 21202

Re: Port Covington Master Plan – Bikemore Comments

Director Stosur:

Thank you for the opportunity to submit comments on the proposed Port Covington Master Plan.

Bikemore is Baltimore City's livable streets advocacy organization. We work to increase and improve bicycle infrastructure, policies, and awareness to create a safer, healthier, and more livable Baltimore. Organizing around bicycling and walking is our tool to engage a diverse Baltimore population in conversations about equitable development, neighborhood design, and access to jobs and opportunity. It is through this lens that we evaluate plans for Port Covington.

Our colleagues at the ACLU of Maryland and the Public Justice Center have provided accurate commentary¹ on the plan as a whole which, in using the planned financing technique and other government subsidy, doubles down on a failed economic development strategy in our city.

At Bikemore, we support increasing density in our city through infill development and rehabilitation of our historic neighborhoods, and we support Transform Baltimore's idea of where our city should be headed. This plan misses that mark.

I. It is Baltimore City Policy to prioritize people over cars.

According to the Baltimore City Comprehensive Master Plan², adopted by the Planning Commission, "the need for affordable and moderately priced, quality housing to retain socio-economically diverse current citizens of Baltimore; and attracting new households is a central goal of the CMP." Our city must "create larger tracts of land for commercial or industrial development near transportation centers; and connect residents to

¹ <https://drive.google.com/file/d/0B3TXbqCzvbEzMEo3T0FualJsLXM/view>

² <http://planning.baltimorecity.gov/planning-master-plan/plan>

available employment opportunities.” New infill development is to be transit oriented. Transit access and transportation planning are listed as “integral” in the development process. The plan frequently mentions goals of rewriting parking standards to encourage transit oriented development and reduce auto dependency. It repeatedly calls out parking as a “poor use” in central business districts and high density areas.

Baltimore Mayor and City Council Resolution 09-0433 directs Baltimore City Department of Transportation to apply “complete streets” principles to the planning, design, and construction of city transportation improvement projects.³ The Baltimore City Department of Transportation Complete Streets Policy requires the department to prioritize pedestrians, transit riders, and bicyclists over personal automobiles in large-scale capital projects.⁴

II. The Port Covington Master Plan prioritizes cars over people.



Figure 1. Proposed off-street parking are highlighted in green. Parking dominates the site layout.

The Port Covington Master Plan calls for 17,250 parking spaces. Using the median parking structure construction cost for Baltimore in 2016⁵, **this represents a \$306 million investment in parking** in Port Covington, dwarfing the proposed investments in bicycle, walking, and transit infrastructure.

The plan also calls for **\$200 million in Federal investment on I-95**, to promote direct personal automobile access to Port Covington. Again, this represents a larger investment in personal automobile transportation than the proposed investments in bicycle, walking, and transit infrastructure.

³ <https://baltimore.legistar.com/LegislationDetail.aspx?ID=2176700&GUID=8C8E6279-F092-4BA4-813E-0AF6CC4137A8&Options=&Search=>

⁴ BCDOT Complete Streets Policy, Director Johnson Memorandum, November 8, 2013

⁵ <http://www.carlwalker.com/wp-content/uploads/2016/05/2016-Carl-Walker-Cost-Article.pdf>

The combined total of proposed investments for personal automobile access and storage in this plan is **over \$500 million, close to the proposed TIF amount, and far higher than any investments in biking, walking, or transit.**

III. Few Details on Biking, Walking, and Transit

Bicycle, walking, and transit infrastructure in the plan is not well defined. "A" and "B" street typologies are listed, but the renderings of these streets are inconsistent with the proposed bicycle and pedestrian network. "B" street typologies seem to indicate no dedicated bicycle infrastructure, which would be unacceptable.

Urban boulevard typologies are mentioned, which historically in Baltimore are designed like surface level highways, such as Harford Road or Martin Luther King Boulevard.

The proposed rail spur from the Central Light Rail is completely undefined, and there is no clear commitment from the State of Maryland, which recently canceled the Red Line, a \$2.9 billion light rail project in Baltimore City, over a similar-in-size proposed state financial contribution.

The proposed "internal rail circulator" is similarly poorly defined. It is unclear if this will be an on-street transit facility like a streetcar, or an elevated people-mover style system, found in many other failed mega-development projects across the world.

IV. Relying on Failed Policy, Methodology, and Exacerbating Inequity

Baltimore City continues to double down on failed policy and outdated methodology, and as a result, continues to actively build an inequitable, segregated city.

Instead of throwing money at the wealthy in a bid to keep them invested in Baltimore, we can build a city that people can't say no to investing in. Cities cannot operate like venture capitalists, looking for the next big thing. We must instead invest in the basics that attract and retain residents and employers—it is our city's fiduciary responsibility.

Baltimore must finance projects that enhance and expand access to opportunity for its residents. The number one factor in upward mobility is access to transportation,⁶ and as such that should be our city's main focus. With a quality transportation network, livable streets, and investment in active, walkable, healthy neighborhoods, people will want to stay here and move here without financial subsidy. These investments will actively address inequity.

⁶ http://www.equality-of-opportunity.org/images/nbhds_exec_summary.pdf

The Port Covington project could support these goals. It could be a dense, walkable, mixed-use community that focuses on putting people over cars. If it was designed as such, it may even be a good idea to subsidize this kind of development. But it's not that.

V. Bikemore Recommendations

Bikemore supports the recommendations made by our colleagues at the ACLU of Maryland and Public Justice Center⁷, calling for equitable growth and shared prosperity. We must invest in the people of Baltimore and access to upward mobility, and that starts with putting people before cars. Our additional recommendations are as follows:

- **The Planning Commission must request a comprehensive bicycle and pedestrian plan for Port Covington.** This master plan should clearly define street typologies and which streets will have protected, dedicated bicycle facilities. All streets in the plan should follow a modal hierarchy that places pedestrians first, followed by transit and bicycles. Personal automobile access should be the lowest priority. "B" street typologies should have on-street dedicated bicycle facilities.
- **The Planning Commission must request a comprehensive transit plan for Port Covington.** The undefined light rail spur and internal rail circulator need proposed alignments, frequencies, and construction timelines including costs defined. Bus routes and access are also undefined, and bus corridors, frequencies, and service implementation timelines and costs also must be defined. The developer should seek a letter of commitment and timeline from the state for implementation of these transit facilities, or finance these improvements themselves.
- **The Planning Commission must demand better access to and from Baltimore neighborhoods.** The master plan currently provides for a single shared use path connecting to neighborhoods north and west, and a proposed light rail spur. The study area is otherwise completely disconnected to Baltimore neighborhoods, surrounded on three sides by water, and walled off from the city by an interstate and a failing, pedestrian and bicycle inaccessible bridge. As it stands, this proposal is a segregated city only easily accessible to those with the means to own a car. The commission should demand additional proposed rail, pedestrian, and bicycle connectivity investment to neighborhoods north and south.
- **The Planning Commission should waive parking requirements on this project.** As a mixed use development, it is reasonable to expect parking could be shared amongst users. Individuals departing Port Covington for work elsewhere

⁷ <https://drive.google.com/file/d/0B3TXbqCzvbEzMEo3T0FuaIJsLXM/view>

in a personal automobile will not be using parking during the day, as they work offsite. Inbound Port Covington workers may use these parking spaces. Requirements should be waived, and the commission should demand a large reduction in proposed parking. Space savings could be transferred to affordable housing construction and cost savings could be transferred to affordable housing subsidy. Personal automobile transportation will radically change in the next 30 years, and we should be designing with that in mind.

- **The Planning Commission should demand parking be priced at true cost, and parking cost unbundled and demand based on unbundled pricing.** Subsidizing or making free parking passes the costs of parking from those who choose to have personal automobiles to those that do not have them. The \$306 million to construct parking will need to be paid back somehow, and if it is not direct revenue from parking pricing, it will be from bundling parking into higher rents for tenants and residents. This encourages car ownership or solo car commutes for individuals that may otherwise forgo ownership or car commuting, because they are paying for the space whether they use it or not. It also unfairly penalizes individuals unable to afford or access a personal automobile (35% of our city's residents), increasing the cost of housing and retail goods and services. According to Urban Planning Professor Donald Shoup, bundling parking makes "people who are too poor to own a car pay more for groceries to ensure that richer people can park for free when they drive to the store."⁸

Bikemore works every day to build a more livable city that will attract and retain residents and employers. We support good new development. However, when projects ask for significant public subsidy, they must clear a high bar of public and government scrutiny.

We have an opportunity to construct a true world-class development at Port Covington, and to do it right. That begins with sending this plan back, pending implementation of the recommendations of the ACLU of Maryland, Public Justice Center, and Bikemore—all of which are supported by Baltimore City and the Planning Commission's own stated vision and goals.

Sincerely,

Jed Weeks
Board Chair
jed@bikemore.net

Liz Cornish
Executive Director
liz@bikemore.net

⁸ http://www.accessmagazine.org/wp-content/uploads/sites/7/2016/05/access48-webprint_cuttingthecost.pdf



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606.324.3445

New England District 615

617.523.6150

New Jersey District

973.824.3225

Western Pennsylvania District

412.471.0690

www.seiu32bj.org

June 16, 2016

Baltimore City Planning Commission Members
Chairman, Wilburn Cunningham
417 E. Fayette St.
8th Floor
Baltimore, MD, 21202

Sagamore's Port Covington Master Plan has left Baltimore's working families with more questions than answers. As one of the largest urban redevelopment projects in the United States, the commission has a moral and economic obligation to hold Sagamore and Under Armor accountable to our communities. You can and must ensure that Sagamore and Under Armor are responsible partners by maximizing this opportunity to reduce Baltimore's shamefully high poverty rate.

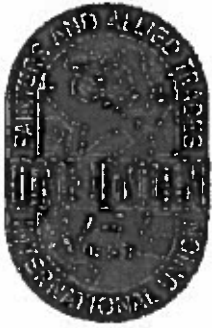
Sagamore states their project will create thousands of new jobs for our city. Our public dollars should be used to support family-sustaining jobs for workers in low-income communities and communities of color who are too often left out. Government funds should not go to poverty jobs that often force working families to rely on public assistance and impair their ability to contribute to the city's economy. Baltimore should ensure that the jobs created at Sagamore help lift our community up.

Although the construction of this development will spread over decades, construction is still temporary work. To ensure that Port Covington creates a real pipeline to long-term careers, Sagamore must require that apprentices are registered with the Maryland State Apprenticeship system, and part of apprenticeship programs that have proven successful in enrolling and graduating construction apprentices to journey-level workers.

Moreover, Port Covington can only be truly transformational if a minimum of 20% of all new units built are affordable across several affordability levels, and ensure that the affordable units are comparable to market rate units. It would be unacceptable and irresponsible to exempt this development from the City's affordable housing mandates.

The commission has a rare opportunity right now to help restore working families' faith in government and move workers out of poverty and off taxpayer funded programs. To do so, we urge you to require a Memorandum of Understanding that includes mechanisms for accountability and transparency before approving Sagamore's Master Plan. This is good for business and good for our community. We stand ready to work with you to assist in your efforts.

Sincerely,
Jaime Contreras
Vice President
32BJ SEIU



INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES, AFL-CIO DISTRICT COUNCIL NO. 51

June 16, 2016

District Council No. 51
4700 Boston Way
Lanham, MD 20706
(301) 918-0182
(301) 918-3177 Fax

Baltimore City Planning Commission Members
Chairman, Wilburn Cunningham
417 E. Fayette Street
8th Floor
Baltimore, MD 21202

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Paint Makers

At the June 2, 2016 hearing, Sagamore laid out their Port Covington Master Plan. While pages of their plan describe their vision for the development, we are left with more questions than answers. As one of the largest urban redevelopment projects in the United States, we believe Sagamore and Under Armor must do more to fully reach its goal as a transformational project for Baltimore.

While Sagamore states their project will create thousands of new jobs for our city, it is still unclear what kind of jobs these will be. Our public dollars and subsidies cannot be used to subsidize dead-end jobs. We need real commitments that Sagamore will create good jobs for Baltimore residents, including real opportunity for workers from low-income communities and communities of color who are too often left out. Every job throughout the life of this project should provide the family sustaining wages and benefits that will allow many of us to not only survive, but thrive in Baltimore.

The construction of this development will spread over decades, however, let's be very clear construction is still temporary work. We must make sure that Port Covington creates a real pipeline to long-term careers. In order to do that, Sagamore must require that apprentices are registered with the Maryland State Apprenticeship system and part of apprenticeship programs that have proven successful in enrolling and graduating construction apprentices to journey-level workers. This will ensure that the hundreds of temporary construction jobs can lead to a long lasting pathway to other opportunities.

ONE AGENDA

Furthermore, if Port Covington is really to be transformational, it is unacceptable this development is exempt from the City's affordable housing mandates. At minimum, 20% of all new units built be affordable across several affordability levels, and ensure that the affordable units are comparable to market rate units.

Affiliated Local Unions
Local Union 1
Local Union 368
Local Union 474
Local Union 890
Local Union 863
Local Union 1100
Local Union 1846
Local Union 1837
Local Union 1987

We believe that all public money should have a clear and measurable benefit for every community. Before this commission approves Sagamore's Master Plan, our communities need real commitments in the form of a Memorandum of Understanding that includes mechanisms for accountability and transparency

Over 100 Years Serving
Maryland
Virginia
Washington, DC

Sincerely,

Lynn O. Taylor II
Business Manager/Secretary-Treasurer

June 16, 2016

Baltimore City Department of Planning
417 E. Fayette Street, 8th Floor
Baltimore, MD 21202

Dear Director Thomas J. Stosur,

As you know, Baltimore is a top 8 hypersegregated city along with Birmingham, Chicago, Cleveland, Flint, Detroit, St. Louis, and Milwaukee. Most—if not all—of these cities and metropolitan areas are in crisis. Baltimore is in a deep crisis a little over one year after the April 27 Uprising that shook our city in 2015.

The decision before the Department of Planning right now—whether to approve the Port Covington Master Plan as it stands—is one of the defining planning moments in the history of Baltimore City. You know that Baltimore was the first city to pass a comprehensive racial zoning ordinance on December 20, 1910. You know that the Roland Park Company drafted the first racially restrictive covenants in 1912 and that this legacy became a part of our city's legacy when the city expanded in 1918.

You know that that in 1922, then mayor Howard Jackson created a Committee for Segregation. You know that Baltimore was among the first cities to draft a Residential Security map in 1937 to redline African American residents out of access to critical capital, thereby intensifying the devastating impact of segregation. This is the legacy of your planning department.

But there is another legacy. Fifty years ago, Dr. Martin Luther King Jr. and the Southern Christian Leadership Conference went "up south" to Chicago to partner with local activists to help desegregate Chicago's segregated housing market. In Maryland, desegregation advocate Walter P. Carter and his colleague created Activists for Fair Housing Inc. In a 1971 report published less than a month after the great Walter Carter's death, Activists, Inc. wrote regarding the discriminatory housing market:

If the practices described in this and our previous studies continue, it will only be a matter of time before the city is destroyed. For exploitation places destructive and disorganizing pressure on family structures and stability and on city neighborhoods.

Baltimore should be a beautiful place to live, to grow, and to work. It can only be such if we preserve, serve, and nourish our most precious resource, people and families.

Nearly 45 years later, their words still ring true. This is what is at stake with the Port Covington Master Plan: will we create a plan that will affirmatively further fair housing as the 1968 Fair Housing Act and the 2015 HUD rule mandates? Or will we intensify

segregation in Baltimore by creating a luxury community and a majority White residential area at the corner of what is informally called "the White L"?

You know that residential zoning is not even allowed for this area as shown in the Baltimore City Master Plan or in the Middle Branch Master Plan. This is why a wholly new Port Covington Master Plan needs to be passed, because it is not aligned with the relevant planning documents. And if that wasn't bad enough, there has been NO compliance with the affirmatively furthering fair housing clause of the Fair Housing Act. If the BDC or Sagamore or the City had been in compliance, then the city benefits agreement would include a full 10% of all residential units go to residents with Housing Choice Vouchers.

With 10% of the Port Covington residential units going toward residents with Housing Choice Vouchers (who are nearly 100% African American in due to racially discriminatory housing and forced displacement policies), we would give 1,400 Black families the chance to live in Port Covington and have access to opportunity, better schools, and more resources. It would help ensure that we don't reinforce the White L with another exclusive and racially discriminatory community. If we honored the Inclusionary Housing ordinance, we could add another 20% of residents into the community to ensure people at all ends of income-scale are included. If these 2,800 Affordable Ownership or Rental Units were distributed in proportion with the city's demographics, then that would allow 1,764 more Black families to live in Port Covington. Altogether, this would ensure that 3,164 of the planned 14,000 residential units (22.6%) would be African American.

Although 22.6% would be nowhere close to the 63% of our city that is African American, it would be a magnificent achievement in terms of boosting access, opportunity, and resources for those who have been greatly harmed by the scope of our city's racist policies and practices. It would mean that people with Housing Choice Vouchers would be no longer clusters in areas that are still disinvested, still redlined.

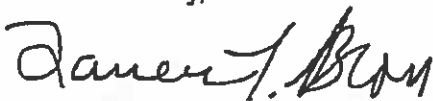
My recommendations here are consistent with the 1968 Fair Housing Act, the 2015 HUD Rule to Affirmatively Further Fair Housing, the 2009 Inclusionary Housing city ordinance, and the City of Baltimore Comprehensive Master Plan which says on p. 75 that the #1 Live Goal and #1 Objective of that goal is to *Build Human and Social Capital by Strengthening Neighborhoods and Expand Housing Choices for All Residents*. It also states:

The City will develop an inclusionary housing plan to foster and retain a quality mix of a affordable, accessible and visitable housing choices and mixed-income neighborhoods throughout Baltimore. For large development projects in the City, including those made possible via rezoning and/or public subsidy, the plan would create a set aside as "inclusionary" the definition of which would be determined by the type of project, whether rental or for-sale units.

Hence, you do not need to reinvent the wheel! You have the entire legal framework that you need to do the right thing and ensure that the Port Covington Master Plan helps to affirmatively further fair housing and helps to desegregate Baltimore City. We are not only administering a \$660 million TIF plan, but we are also giving away \$725 million in tax revenue due to brownfield rehabilitation tax credits and Enterprise Zone tax credits. We do not need to feel guilty for enforcing the law and doing the right thing. We will be boosting Mr. Plank's bottom line. The question is: do you have the integrity to boost Baltimore's bottom line and incorporate fair housing strongly into the Port Covington Master Plan?

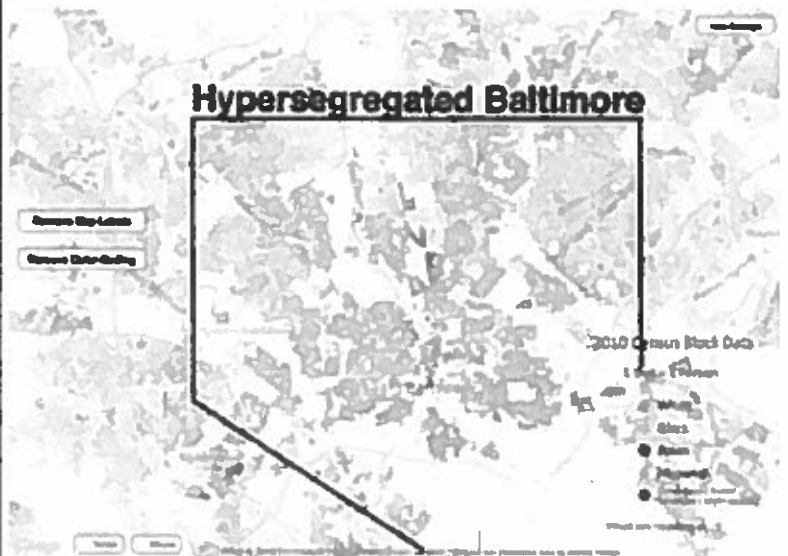
The fate and future of this city lies in your hands...

Most sincerely,



Lawrence Brown, PhD, MPA
 Morgan State University professor
 School of Community Health and Policy
 Baltimore City resident
 Member, Baltimore Redevelopment Action Coalition for Empowerment (BRACE)

P.S. As you can see in the map on the left, our TIF policies have largely reinforced and benefitted the White L and thus the Port Covington Master Plan, without affirmatively furthering fair housing, helps to intensify Baltimore City's hypersegregation (map on the right).



Woods, Tamara

From: Deptofplanning
Sent: Monday, June 20, 2016 10:04 AM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Port Covington Plans & Impacts & Inclusion of Roadway/Infrastructure Planning to Westport & Cherry Hill

FYI.

—Original Message—

From: Jose Dory [mailto:josedory@gmail.com]
Sent: Friday, June 17, 2016 11:08 AM
To: Deptofplanning
Subject: Port Covington Plans & Impacts & Inclusion of Roadway/Infrastructure Planning to Westport & Cherry Hill

Dear City Planning Commission,

I am a relatively new resident of Westport. I am a consultant for the federal government in DC and commute to the DC Metro area for work. I enjoy Westport's proximity to major locations within the Baltimore area and all of its cultural offerings. I look forward to the development of Port Covington and realize how close its development will be to our neighborhood and how impactful it could be. While there are many pros of Port Covington, there are some major cons as well.

Overall Concern: One of my concerns about the Port Covington development is that it seems to be contained only within Port Covington's borders and does not have a more inclusive development plan that would speak to what would happen on the Westport and Cherry Hill side. We need this. Westport and Cherry Hill are not in the maps or any plans.

Sub-Points

Reality/Opinion: There should be an expanded scope of its road and infrastructure plan, which should include Westport and Cherry Hill. As a Westport resident, I am naturally concerned and hope that we are not largely ignored. Sagamore Development purchased Westport's waterfront land and it has not been embedded into the future planning and development of Port Covington. This needs to happen. The land in Westport needs to be developed in conjunction with Port Covington. If Westport's waterfront sits, Port Covington, a land that has zero residents, will prosper at the expense of an existing languishing adjacent neighborhood to its west. There are so many reasons why Westport must be considered into the near-term infrastructure development plans for Port Covington:

1) Fact: Westport has an aging road infrastructure that needs total replacement. The overpasses are crumbling and pose a threat to the resident's and drivers safety.

Fact/Remark: I recognize that there are plans that are on the books to replace the roads, but it has yet to happen and there needs to be an immediate push and a high priority to get the improvements underway.

Fact: Some major capital improvement projects include but are not limited to: Annapolis Road, Annapolis Road pedestrian bridge, and the three interchanges for Westport.

Concern: In particular, Annapolis Road is the main corridor of the neighborhood and has suffered decades of neglect. Homes are in shambles, crime is rampant, and businesses are practically non-existent. There are some pockets of the neighborhood where existing homeowners have fixed up their properties, but it has been overshadowed by the large amount of homeowners who have ignored their properties for over 20 years. Opinion: Annapolis Road is a major corridor for commercial vehicles and commuters coming from points south of the city signifying an embarrassing gateway into the city. It can and does deter people from coming into the city to spend their money. Port Covington could be affected just because its neighbors with a languishing neighborhood.

1st Question for Port Covington: Do we want the existing conditions of Westport's Annapolis Road and the neighborhood in general, to set the tone before arriving to Port Covington? -- Westport's image does and could deter people from coming into the city to spend their dollars. Port Covington is not exclusive to this fact, considering they want to install a bike trail to Westport.

Solution/Remark: We should apply the concepts of the Complete Streets Plan for Annapolis Road in Westport and implement them immediately. There shouldn't be anymore delays.

Remark: All Westport needs is infrastructure improvement, and businesses will follow, and hence traveling through Annapolis Road will be a bit more palatable. Once Annapolis Road becomes improved, it will enhance the safety and culture of the area. The new corridor will help spur economic development and renew interest in rebuilding and rehabilitation of homes.

2) Fact: Westport is a part of the South Baltimore Gateway Community Benefits District. I have plans for those and there will be near-term improvements to the neighborhood starting July 1st 2016 (in FY 17). It does not include major road improvements.

2nd Question: Is there a table or a graphic that shows which groups are managing which projects in Westport? The Local Development Council (LDC), Department of Transportation - Baltimore, MD Department of Transportation, and Federal Highway Administration are groups that are responsible for overseeing capital improvement projects in Westport. All groups have a stake in the projects and it would be nice to provide clarity in who is responsible for what and when.

3) Fact: 295 bisects the Westport community and needs replacement of its interchanges throughout Westport. Port Covington has submitted an application to MDOT and MD SHA, for additional interchanges and light rail transit linkages to its development site.

Concern: Its important that Westport's plans for replacement of its interchanges in their neighborhood to not be overshadowed by Port Covington's future plans in their neighborhood.

3rd Question: Will the new interchanges that are being submitted to the MD SHA, bypass and further isolate Westport?

Final Remarks/Reiteration:

Port Covington should be held accountable and include an extended plan since they purchased land in Westport. I recognize that Port Covington is only worried about Port Covington at the moment, but as far as I see it, its only half done when they do not include their other property to the west. Improvement Plans and studies have been in the works for years in Westport, and if Port Covington gets everything that they need before Westport, it will be a smack in the face.

Sincerely,

Jose Dory

Woods, Tamara

From: Deptofplanning
Sent: Monday, June 20, 2016 10:05 AM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Not Light Rail but Ultra-light rail

FYI.

-----Original Message-----

From: gordon [mailto:gordon1126@yahoo.com]
Sent: Thursday, June 16, 2016 11:30 PM
To: Deptofplanning
Subject: Not Light Rail but Ultra-light rail

Standard Gauge light rail is a good thing for high capacity transport but not all transportation planning requires high capacity. Although standardization is good, one size does not fit all.

I have been discussing with Sen. Miller and with Sagamore Development (Kevin Plank), the possibility of substituting in appropriate places, a narrow gauge rail system for neighborhood connectivity. Costs are likely to be dramatically lower than Standard Gauge but at the deficit of reduced capacity.

I envision Ultra-light rail to be approximately 24" gauge (as used in some parts of the world), with small passenger cars consisting of a center aisle with a single seat to either side. This system would be intended for only 2 to 3 mile connectivity of local neighborhoods to major Standard Gauge rail systems and to bus terminals. By putting Ultralight rail on overhead trestles, city congestion caused by street level trolleys would be avoided. It would be easy to put an overhead bridge across I-95 to Port Covington and thereby avoid the expense of a full Standard Gauge Light rail connection.

Attached are some sketchy notes I prepared for a conference video link discussion with the Covington Port developers. I apologize for the non-standard telegraphic notes, they were only intended to be notes for myself in preparation for the conference call. Obviously, the discussion applies to all parts of Baltimore where only neighborhood connectivity to major transportation nodes is required. I am a retired physicist with no financial connection to any of these parties. I have undertaken this project purely as a public pro bono issue.

I intend to publish an article in the Baltimore Sun concerning the Ultralight rail concept. The amusement 24" gauge railway in Wheaton Regional Park, MD is worth visiting for an example of Ultralight rail. The passenger cars there are designed for amusement, not commuter use.

Port Covington and General Notes as follows:

Ultralight rail

Economics of procurement. Engineering is costly. There is economy of scale in any product. Therefore there is an advantage to designing to wide geographic area with potentially a lot of customers. Try for Md legal standard, or Federal, for secondary Ultralight standard to create a "market" for manufacturers and for procurers.

Should design for all geographies, street level, underground, elevated trestle like Chicago loop.

Issues: not gauge but "gauge loading" that saves money. Digging or tunneling costs saved for underground because of reduced width.

Should beat bus economics, perhaps factor of 2 or 3 to save on driver personnel costs to pay for capitalization costs of rail vs bus.

Clean burning CNG or Propane option suggested to avoid electrical infrastructure. That implies only short tunnels. Else, ventilation. But electrical is an option in geographical areas where required. Flywheels ? Batteries ? Auto shutoff of engine until out of long tunnel.

A purpose of short neighborhood trips implies lots of starts and stops. Locomotive only traction can work, but won't accelerate fast like all car drive. Therefore consider a locomotive with generator that supplies power to the passenger car wheels. Also helps on high grade above 1 % . . Druid hill 1 1/2 % if straight trip harbor tourist area to hill.

TBD one axle per truck or two axles on cars, 4 axles altogether.

Because of small narrow cars to save tunneling and real estate costs, this implies 1 seat on each side, aisle down middle with middle aisle hang-on straps when no seat is available. This is half the linear loading of a bus or train, so 2 bus lengths of ultralight rail would equal one bus load. If 2X bus load capacity therefore 4 bus lengths (4 x 40 ft) train length . That is OK. A fraction of linear loading implies less costly overhead trestles. Also implies longer boarding platforms.

Don't make the car lengths too long. DC metro uses 75 ft cars. Something more like the length of a bus (40 ft or less) would be better in order to avoid "secant" cutting across of long car on tight curves. Even shorter than bus length would be still better in order to transport for repair on flatbed truck on streets. Neighborhood connectivity might not all go to central repair depot.

For short trips, Climate control not too important. Save on AC, but seat heating needed, and need cold weather wind shielding of enclosed car.

Cut off top corners of profile to minimize sideways wind loading. e.g. bridge across a local baltimore bay in hurricane conditions. Also minimizes tunneling costs for tunnel machine. Create circle center, use to cut off top corners. Draw a picture of the train in a round tunnel.

Safety of passengers depends upon safety and comfort of train driver. Therefore extra investment for driver compartment for bullet resistance and climate control.

Linear cam fins on track for positive train control (PTC). Or look into what Standard Gauge is doing. DOT PTC requirement. Two PTC signals required: reduce throttle, apply brakes. PTC needed in case of suicidal or careless or injured train driver.

Woods, Tamara

From: Planning, General
Sent: Tuesday, June 14, 2016 1:54 PM
To: Woods, Tamara
Subject: FW: Port Covington plan

Laurie Feinberg

Our Mission: To build Baltimore as a diverse, sustainable and thriving city of neighborhoods and as the economic and cultural driver for the region.

From: I. Jeter [mailto:jeetz_1@yahoo.com]
Sent: Sunday, June 12, 2016 11:06 AM
To: Planning, General
Subject: Port Covington plan

Minorities will not benefit. It will be the same as the Harbor project!
As the story has always gone, there'll be jobs and after we have completed your project, it's get out of Dodge!
The rich will get richer and the poor will continue living poor and destitute. A wrench needs to be thrown in the works to change the course, so that someone else can reap some benefits for a change.

Thanks for your time.

Woods, Tamara

From: Deptofplanning
Sent: Tuesday, June 14, 2016 3:05 PM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Port Covington

FYI.

—Original Message—

From: Greg Boss [mailto:gvb21230@gmail.com]
Sent: Tuesday, June 14, 2016 2:44 PM
To: Deptofplanning
Subject: Port Covington

Dear City Planning Commission,

Cities are the economic powerhouses in the 21st century, and economic growth and renewal are the sustaining force of cities. Large sections of the city have seen little or no development investment for decades.

Port Covington offers a unique opportunity for Baltimore with a location that is both accessible and relatively open for redevelopment. Adjacent to existing transportation and earlier redevelopment, Port Covington represents an extension the efforts of earlier projects. Unlike areas where housing subsidies have attracted (inadequate) investment that has discouraged redevelopment, Port Covington's industrial legacy offers fewer barriers to action.

Port Covington represents a low risk to the city with enormous potential for the region. Developed on some of the last remaining urban waterfront in the area, similar mixes of residential and commercial use have shown strong success in other mid-Atlantic cities.

Greg Boss

Sincerely,

Greg Boss

Woods, Tamara

From: Deptofplanning
Sent: Thursday, June 16, 2016 4:13 PM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Revitalization of Port Covington

FYI.

—Original Message—

From: elaine morton [mailto:emorton9965@yahoo.com]
Sent: Thursday, June 16, 2016 2:44 PM
To: Deptofplanning
Subject: Revitalization of Port Covington

Dear City Planning Commission,

My hope is that the neighborhood will become a thriving Community again. Many of us see this as a sign of Community and economic development in a untapped area of our City.

Sincerely,

elaine morton

Woods, Tamara

From: Planning, General
Sent: Thursday, June 02, 2016 1:02 PM
To: Jennifer Bodine; Planning, General
Cc: The Port Covington Team; Woods, Tamara
Subject: RE: Port Covington

Thank you for your comments and they will become part of the public record

Laurie Feinberg

Our Mission: To build Baltimore as a diverse, sustainable and thriving city of neighborhoods and as the economic and cultural driver for the region.

From: Jennifer Bodine [mailto:jbb@AAubreyBodine.com]
Sent: Thursday, June 02, 2016 10:33 AM
To: Planning, General
Cc: The Port Covington Team
Subject: Port Covington

This plan is the best thing to happen to Baltimore since the Inner Harbor was developed. My father A. Aubrey Bodine, Sun photographer and chronicler of all things Baltimore, spent his adult life in Baltimore photographing most of its nooks and crannies. He would cheer this project, as this poor city is on its knees, if not already prostrate.

This project is a magnet for people and jobs. It gives the people of the city and state a feeling of hope, that our once magnificent city can rise from its ashes.

Please green light this project.

Jennifer B. Bodine

Jennifer B. Bodine, Esq.
Curator, AAubreyBodine.com
www.aaubreybodine.com
410-479-1312

Woods, Tamara

From: Planning, General
Sent: Thursday, June 02, 2016 9:02 AM
To: Brooke Harlander, Planning, General
Cc: Woods, Tamara
Subject: RE: Port Covington Master Plan

Thank you for writing and we will include your email in the Planning Commission record

Laurie Feinberg

Our Mission: To build Baltimore as a diverse, sustainable and thriving city of neighborhoods and as the economic and cultural driver for the region.

From: Brooke Harlander [mailto:brookeharlander@gmail.com]
Sent: Wednesday, June 01, 2016 6:15 PM
To: Planning, General
Subject: Port Covington Master Plan

To whom it may concern:

I am writing in response to the request for comments on the Port Covington Master Plan. I am a Baltimore City resident and believe that this project will positively change Baltimore and help make it a true destination. The plan will create huge opportunity and lots of jobs for generations of current and future Baltimore City residents.

I support the Port Covington Master Plan.

Regards,

Brooke Harlander

Woods, Tamara

From: Deptofplanning
Sent: Tuesday, June 14, 2016 3:04 PM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Port Covington

FYI.

-----Original Message-----

From: Mary McCormick [mailto:nucrox@hotmail.com]
Sent: Tuesday, June 14, 2016 1:56 PM
To: Deptofplanning
Subject: Port Covington

Dear City Planning Commission,

It's a must need for the south side of the city! Please develop Port Covington and invest in it instead of letting it fall into disrepair and becoming an abandoned area offering nothing to Baltimore.

Sincerely,

Mary McCormick

Woods, Tamara

From: Deptofplanning
Sent: Tuesday, June 14, 2016 3:04 PM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Port Convington Project

FYI.

-----Original Message-----

From: Jane Goodrick [mailto:janegoodrick@comcast.net]
Sent: Tuesday, June 14, 2016 2:38 PM
To: Deptofplanning
Subject: Port Convington Project

Dear City Planning Commission,

Dear Commission:

As a long time Baltimore City, specifically Otterbein, Fed Hill and Brooklyn areas, I feel like to Port Covington project is exactly what this specific area needs. Not only is it now an eye sore but local residents, on both sides of the bridge, are stuck with limited resources and few means of finding, close/local jobs and/or places to shop or simply enjoy our city.

I selfishly can't wait to be able to take the Circulator or perhaps cycle to the area to do some shopping and hang out with friends and family. We need more than just Harbor Place and Harbor East.

I am most excited about creating a pedestrian access to this area as well as improving upon Hanover Street Bridge. I sadly have to use this bridge often and my tires pay the price both literally and figuratively.

I thoroughly agree with the planning thus far and hope you will allow Baltimore to become part of one of the biggest and most daring urban renewal projects (if you remember there was lots of apprehension with the opening of Harbor Place as well back in the 80's - - how much money does that area generated for the city???)

Sincerely,

Jane Goodrick

Woods, Tamara

From: Deptofplanning
Sent: Wednesday, June 15, 2016 10:28 AM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Port Covington

-----Original Message-----

From: Nancy Cook [mailto:nscbalto@aol.com]
Sent: Tuesday, June 14, 2016 4:56 PM
To: Deptofplanning
Subject: Port Covington

Dear City Planning Commission,

We need Port Covington and hope you will support this exemplary project for Baltimore community, citizens and tourists no doubt! Thank you for your support for growth by Kevin Plank and Under Armour and thank them for their continued growth and renewal of Baltimore! Nancy Cook

Sincerely,

Nancy Cook

Woods, Tamara

From: Deptofplanning
Sent: Wednesday, June 15, 2016 10:28 AM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Port Covington Support

-----Original Message-----

From: dave murray [mailto:drmur@verizon.net]
Sent: Tuesday, June 14, 2016 6:50 PM
To: Deptofplanning
Subject: Port Covington Support

Dear City Planning Commission,

City Planning Commission Members,

I wholeheartedly support the Port Covington Project. It will be another showcase area within the City's boundaries that will generate jobs, tax revenue, new life in an area that's been run down for some time now, and help those folks within the City prosper. It will also attract many other new residents to the City. It's certainly worth the incentives/funds requested by the Port Covington project team. Vote YES and approve this project.

Sincerely,

dave murray

Woods, Tamara

From: Deptofplanning
Sent: Wednesday, June 15, 2016 10:29 AM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Proposed Port Covington project

—Original Message—

From: Suzanne Farnham [mailto:Suzannefarnham@gmail.com]
Sent: Tuesday, June 14, 2016 11:20 PM
To: Deptofplanning
Subject: Proposed Port Covington project

Dear City Planning Commission,

Dear members of the Planning Commission, The Sagamore proposal for the development of Port Covington is an extraordinary opportunity for the city of Baltimore. It has the potential to make Baltimore a top destination for tourists and an even more exciting place to live. We are indeed fortunate to have a person of Kevin Plank's stature committed to doing business in this city we so love. I enthusiastically endorse the project.

Sincerely,
Suzanne Farnham

Sincerely,

Suzanne Farnham

Woods, Tamara

From: Deptofplanning
Sent: Wednesday, June 15, 2016 10:29 AM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Port Covington

-----Original Message-----

From: Christine von Lange [mailto:Christinesonia@gmail.com]
Sent: Wednesday, June 15, 2016 8:40 AM
To: Deptofplanning
Subject: Port Covington

Dear City Planning Commission,

I am writing to show my support and belief in the Port Covington development project.

Baltimore needs to continue to grow, capitalize on the incredible body of water, the Chesapeake Bay, to draw more business, tourism and activities which will in turn create more jobs and attract individuals to our great city.

Having grown up on Long Island, moving to the greater Baltimore area in my teen years, I am excited to finally be back in Baltimore since 2012, where I have chosen to retire. Let's keep this city growing and adding value to the economy.

I fully support the Port Covington project and look forward to seeing the plans come to reality and hopefully reside there soon.

Please feel free to contact me.

Christine von Lange

Sincerely,

Christine von Lange

Woods, Tamara

From: Deptofplanning
Sent: Thursday, June 16, 2016 1:34 PM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Port Covington Master Plan

FYI.

-----Original Message-----

From: Kia Calloway [mailto:lakelandfriends@aol.com]
Sent: Thursday, June 16, 2016 10:58 AM
To: Deptofplanning
Subject: Port Covington Master Plan

Dear City Planning Commission,

Kia Calloway
2656 Norland Road
Baltimore, MD, 21230
June 16, 2016

Department of Planning
Baltimore City MD

Dear Members of the Planning Commission

I am writing on behalf of the Lakeland Coalition. We are a community organization in the Lakeland Neighborhood. The Lakeland Coalition wants to express our full support of the Port Covington Master Plan.

Our group believes the project will help the region's growing workforce needs and provide both environmental and economic benefits to the surrounding communities and Baltimore City. This plan will transform the peninsula. The group respectfully request that the commission support and approve the Port Covington Master Plan.

Sincerely,
Kia Calloway
Director Lakeland Coalition Green and Clean Team
2656 Norland Road Baltimore MD 21230
443-630-4653

Sincerely,

Kia Calloway

Woods, Tamara

From: Deptofplanning
Sent: Monday, June 20, 2016 10:04 AM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Ref port Covington

FYI.

—Original Message—

From: Fouzia Ahmed [mailto:G4fouzia@gmail.com]
Sent: Friday, June 17, 2016 8:20 PM
To: Deptofplanning
Subject: Ref port Covington

Dear City Planning Commission,

I am supporting the port Covington development project I am batimoreian citizen and please do whatever it take to have this project going

Sincerely,

Fouzia Ahmed

Woods, Tamara

From: Deptofplanning
Sent: Wednesday, June 15, 2016 10:28 AM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Port Covington

-----Original Message-----

From: Stuart michael [mailto:stuartgalonoy@comcast.net]
Sent: Tuesday, June 14, 2016 3:28 PM
To: Deptofplanning
Subject: Port Covington

Dear City Planning Commission,

I am writing in support of the development proposal for Port Covington. I believe that this underused part of the city is ripe for investment . The plans that I have read about and seen are such an amazing opportunity for city. The jobs created during construction will be highly beneficial. The future housing , shops, businesses, will create an exciting neighborhood in South Baltimore. I believe it will also spur new development in the adjacent areas . This project is a game -changer for Baltimore. New job creation , leading to more housing needs. Its a total win-win situation for the city. I am 100% behind this new and wonderful project for Baltimore .

Sincerely
Stuart Michael

Sincerely,

Stuart michael

Woods, Tamara

From: Deptofplanning
Sent: Wednesday, June 22, 2016 9:03 AM
To: Ararsa, Wolde
Cc: Woods, Tamara
Subject: FW: Port Covington Project

FYI.

-----Original Message-----

From: Harold Floyd [mailto:hjfloyd21225@yahoo.com]
Sent: Tuesday, June 21, 2016 11:34 PM
To: Deptofplanning
Subject: Port Covington Project

Dear City Planning Commission,

JUST DO IT !!!!

Sincerely,

Harold Floyd

Woods, Tamara

From: Planning, General
Sent: Wednesday, June 22, 2016 12:01 PM
To: Woods, Tamara
Subject: FW: Port Covington

Laurie Feinberg

Our Mission: To build Baltimore as a diverse, sustainable and thriving city of neighborhoods and as the economic and cultural driver for the region.

From: Speckmann [mailto:dspeckma@yahoo.com]
Sent: Tuesday, June 21, 2016 5:21 PM
To: Planning, General
Subject: Port Covington

Dear Mr. Stosur,

I am writing to you today to express my support for the Port Covington project that is currently before your committee for review. This project will revitalize and improve a underutilized and vacant area that is seen by everyone who drives through Baltimore on Route 95. Once improved this "front porch" of Baltimore will help to attract thousands of new visitors every year.

In addition to improving the visual stature of the city, the work to transform this area will provide thousands of construction jobs for years for city residents. City taxes will increase from new residences and a businesses that move to the area. In addition, one of the biggest employers in the city, Under Armour, will have the space needed to expand and support their growing business.

The plans put forth by the development company are amazing and generously include numerous parks, boardwalks, etc... for all to enjoy. Having such a beautiful open and inviting place to enjoy within the city would be beneficial to all city residents. We are very lucky to have this project in our city and be able to reap the benefits from it. Please vote to approve this project so that Baltimore may grow into a world class destination and city.

Thanks,

Doug Speckmann
2909 Fait Ave
Baltimore, MD 21224

Woods, Tamara

From: Planning, General
Sent: Wednesday, June 22, 2016 12:00 PM
To: Woods, Tamara
Subject: FW: Port Covington Inclusionary Housing

Laurie Feinberg

Our Mission: To build Baltimore as a diverse, sustainable and thriving city of neighborhoods and as the economic and cultural driver for the region.

From: Sandy Robson [mailto:sandyrobson@gmail.com]
Sent: Friday, June 17, 2016 11:06 AM
To: Planning, General
Subject: Port Covington Inclusionary Housing

To Whom it May Concern:

I sincerely hope that the Department of Planning uses its powers to help redefine Baltimore's segregated landscape. Please take advantage of this moment to enforce a meaningful inclusionary housing mandate in the plans for Port Covington. If the developers say their plans are going to benefit everyone in Baltimore, let's hold them to it. My beliefs are consistent with the letter sent by Lawrence Brown.

Sandy Robson
2108 Erdman Ave
410-206-7826