

**CRITICAL AREA COMMISSION  
CHESAPEAKE AND ATLANTIC COASTAL BAYS**

1804 West Street, Suite 100  
Annapolis, Maryland 21401

**MEMORANDUM**

To: Project Committee, Critical Area Commission

From: Jamileh Soueidan, Natural Resources Planner

Date: December 3, 2025

Subject: Jennifer Road Parking Lot (Anne Arundel County)

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Anne Arundel County is requesting preliminary feedback from the Project Committee regarding a proposed parking lot along Jennifer Road in Annapolis, Maryland. The project will require Conditional Approval under COMAR 27.02.06 by the Critical Area Commission because the project exceeds the 15% lot coverage limit in the Resource Conservation Area (RCA) and proposes nonwater-dependent Buffer disturbance. The purpose of this preliminary Project Committee discussion is to provide feedback to the County regarding the development plans and proposed mitigation to address the lot coverage exceedance and Buffer disturbance. In particular, the Project Committee should consider whether the current proposal fully addresses the requirements for Conditional Approval.

A copy of the proposed site plan is attached.

**Background and Existing Conditions**

Anne Arundel County is proposing a new satellite parking lot with 50 parking spaces to serve the existing County's Department of Corrections Central Holding Processing Center (CHPC), which was opened in 2020 and displaced existing parking. The existing parking lot on the north side of Jennifer Road, west of the project site, which has 55 parking spaces, is undersized for the current capacity. The initial impact of the loss of parking in 2020 was not realized due to the COVID-19 pandemic as certain activities, such as visits, client reporting, and volunteer programs were canceled during the pandemic. Since full operations have resumed post-COVID, CHPC has struggled to provide adequate parking to support daily activities. Presently, in addition to the existing parking at CHPC, the Department of Corrections has been utilizing parking at Anne Arundel Medical Center, located west of CHPC, street parking, and parking at the adjacent fire station. The proposed parking lot will provide CHPC the appropriate amount of parking for the capacity required to support daily activities.

The project is located on a County-owned parcel (Parcel 74), which is located partially within the Critical Area on land designated as Resource Conservation Area (RCA) and Intensely Developed Area (IDA) and straddles Jennifer Road (see Attachment 1). The proposed parking lot will be located almost entirely within the RCA portion of Parcel 74. Existing lot coverage within the

RCA portion of Parcel 74 is 6,639 square feet (8.9%) and existing forest and developed woodland on site is 50,510 square feet (67.48%).

### **Proposed Project Impacts and Mitigation**

The proposed development includes a 50-space parking lot, with access to Jennifer Road for ingress and egress, and a retaining wall for slope stabilization. The majority of the proposed parking lot is within the Critical Area Buffer, which is expanded for steep slopes.

#### Lot Coverage

The development will result in an additional 16,623 square feet of lot coverage within the RCA portion of Parcel 74 for a total of 23,262 square feet of lot coverage (or 31.05% of the site). This will exceed the 15% lot coverage limit for the RCA and will require mitigation at a ratio of 1:1 for the lot coverage exceedance, or 12,034 square feet of planting.

#### Forest Clearing

The project will result in 10,065 square feet of clearing (or 19.93%) of the existing forest on the site. All clearing will be occurring within the Critical Area Buffer, which is expanded for steep slopes. Mitigation for the forest clearing is required at a 1:1 ratio.

#### Buffer Impacts

The project proposes approximately 18,784 square feet of permanent impacts to the expanded Buffer. This includes 13,404 square feet of lot coverage and 10,065 square feet of forest clearing. Mitigation is required at a 3:1 ratio for the permanent disturbance, or 56,352 square feet of planting.

#### Tidal and Nontidal Wetlands

There are no impacts to tidal wetlands, nontidal wetlands, and/or nontidal wetland buffer.

#### Critical Area 10% Phosphorus Reduction

The project is not located in the IDA; therefore, the Critical Area 10% phosphorus reduction requirement is not applicable.

#### Proposed Mitigation

Impact Type	Parcel 74		
	Impacts (sf)	Mitigation Ratio	Total Mitigation (sf)
Lot Coverage Over 15%	12,034	1:1	12,034
Forest Clearing (within Buffer)	10,065	1:1	10,065
Permanent Buffer Disturbance	18,784	3:1	56,352
Temporary Buffer Disturbance	3,348	1:1	3,348
<b>Overall Total</b>			<b>81,799</b>

Due to site constraints, only a portion of the mitigation plantings will be met onsite, while the County is exploring offsite locations for the remaining portion.

Therefore, the County is proposing the following mitigation to fulfill the mitigation requirements as well as to satisfy the conditional approval request to exceed the 15% lot coverage limit and for disturbance to the Critical Area Buffer:

- The County will provide 5,400 square feet of mitigation onsite in the form of native plantings, which include 18 2.5-3"-caliper trees and 177 shrubs. These plantings will be located within and outside of the expanded Buffer; and
- The County is exploring opportunities to fulfill the remaining 76,399 square feet of mitigation offsite.

### **Permits and Review by Other Agencies**

Review by other agencies, including the Department of Natural Resources' Wildlife and Heritage Service (WHS), Maryland Historical Trust (MHT), and local Soil Conservation District, is pending. The County may provide a status update during the Project Committee meeting.

### **Conditional Approval Requirements**

When reviewing projects of this nature, the Critical Area Commission must consider how the proposal addresses the requirements for conditional approval under COMAR 27.02.06. In order to qualify for consideration by the Commission for conditional approval, it shall be shown by the proposing or sponsoring agency that the project has the following characteristics:

*B. (1) That there exist special features of the site or there are other special circumstances such that the literal enforcement of these regulations would prevent a project or program from being implemented;*

*B. (2) That the project or program otherwise provides substantial public benefits to the Critical Area Program;*

*B. (3) That the project or program is otherwise in conformance with this subtitle;*

The conditional approval request shall, at a minimum, contain the following:

*C. (1) A showing that the literal enforcement of the provisions of this subtitle would prevent the conduct of an authorized State or local agency program or project;*

*C. (2) A proposed process by which the program or project could be so conducted as to conform, insofar as possible, with the approved local Critical Area program or if the development is to occur on State-owned lands, with the criteria set forth in COMAR 27.02.05;*

*C. (3) Measures proposed to mitigate adverse effects of the project or program or an approved local Critical Area program or, if on State-owned lands, on the criteria set forth in COMAR 27.02.05.*

The Commission shall approve, deny, or request modifications to the request for conditional approval based on the following factors:

*E.(1) The extent to which the project or program is in compliance with the requirements of the relevant chapters of this subtitle;*

*E.(2) The adequacy of any mitigation measures proposed to address the requirements of this subtitle that cannot be met by the project or program; and*

*E.(3) The extent to which the project or program, including any mitigation measures, provides substantial public benefits to the overall Critical Area Program.*

#### **Purpose of Project Committee Discussion**

The purpose of this preliminary Project Committee discussion is to provide feedback to the County regarding the development plans and proposed mitigation associated with this conditional approval request. In particular, the Commission should consider the following:

- Is there an opportunity for the County to reduce lot coverage and/or further minimize impacts to the Critical Area Buffer to better align with the spirit and intent of the Critical Area law and regulations and the County's Critical Area Program?
- Given that the County is exploring options regarding the offsite mitigation, are there specific considerations the County should factor into this review (e.g., location of offsite mitigation, long-term monitoring and maintenance requirements, etc.)?
- Will stormwater management (SWM) be provided onsite?
  - If runoff will be directed to the existing SWM facility, is there adequate capacity to treat the volume of runoff from the proposed parking lot?
  - During extreme weather events, is it possible that runoff from the proposed parking lot could adversely impact the steep slopes located directly adjacent to the site?
- Will additional erosion and sediment control measures be considered due to the proximity of the site to steep slopes, wetlands, and a stream?
- Has the County investigated other options to provide CHPC with adequate parking that would avoid and/or minimize impacts to the Critical Area RCA and other sensitive natural resources (steep slopes, wetlands, stream)?
- Does the expansion of this institutional use into the RCA meet the current provisions of the County's Critical Area Program?

Representatives for the project (County staff and developer) have been invited to attend the Project Committee meeting to help answer questions and receive feedback.

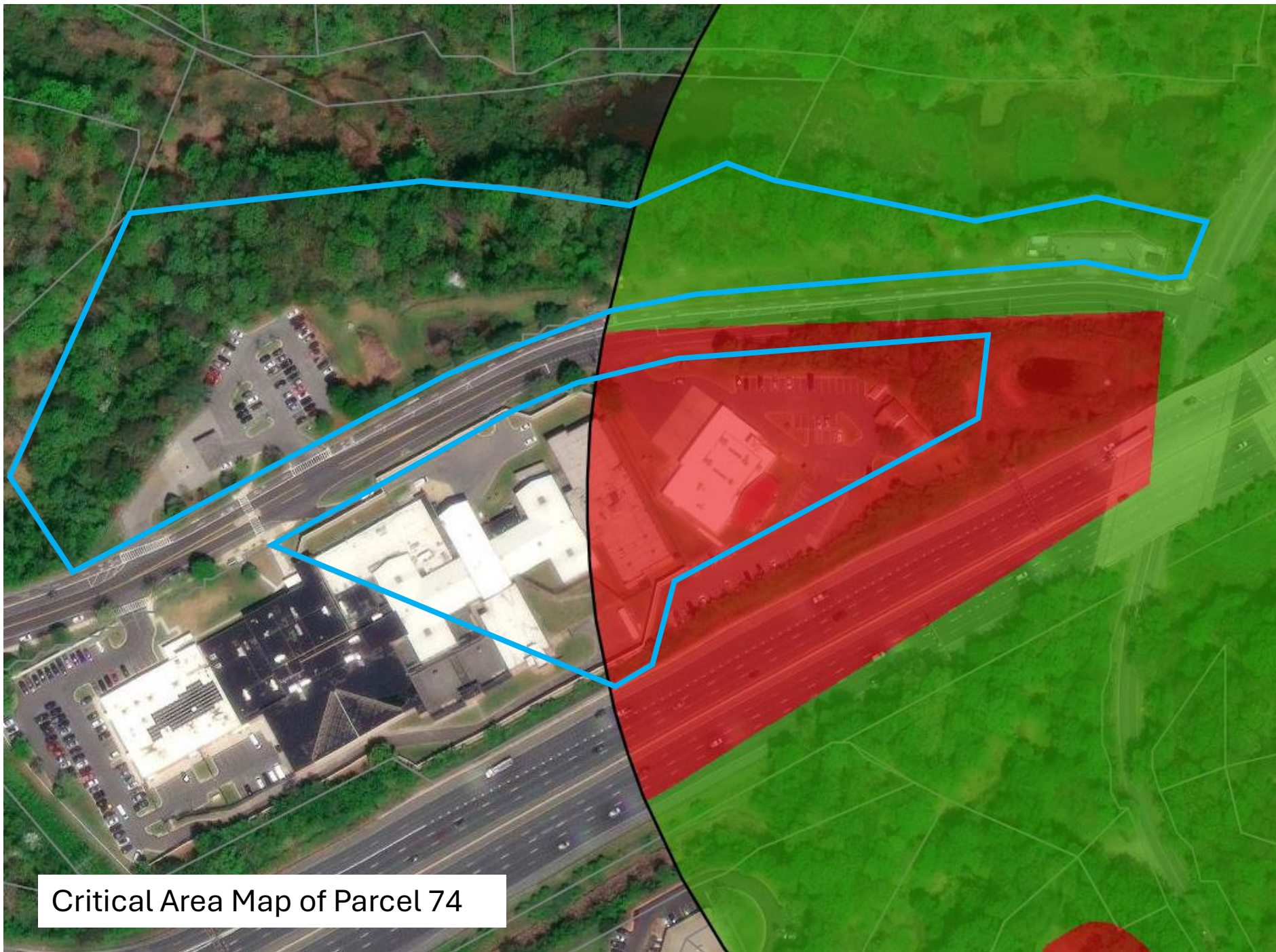
Jennifer Road Parking Lot Conditional Approval  
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If you have any questions regarding the proposed project prior to the upcoming discussion at the December 3, 2025 Project Committee meeting, please contact Jamileh Soueidan at (410) 260-3462 or [jamileh.soueidan@maryland.gov](mailto:jamileh.soueidan@maryland.gov).

ATTACHMENTS:

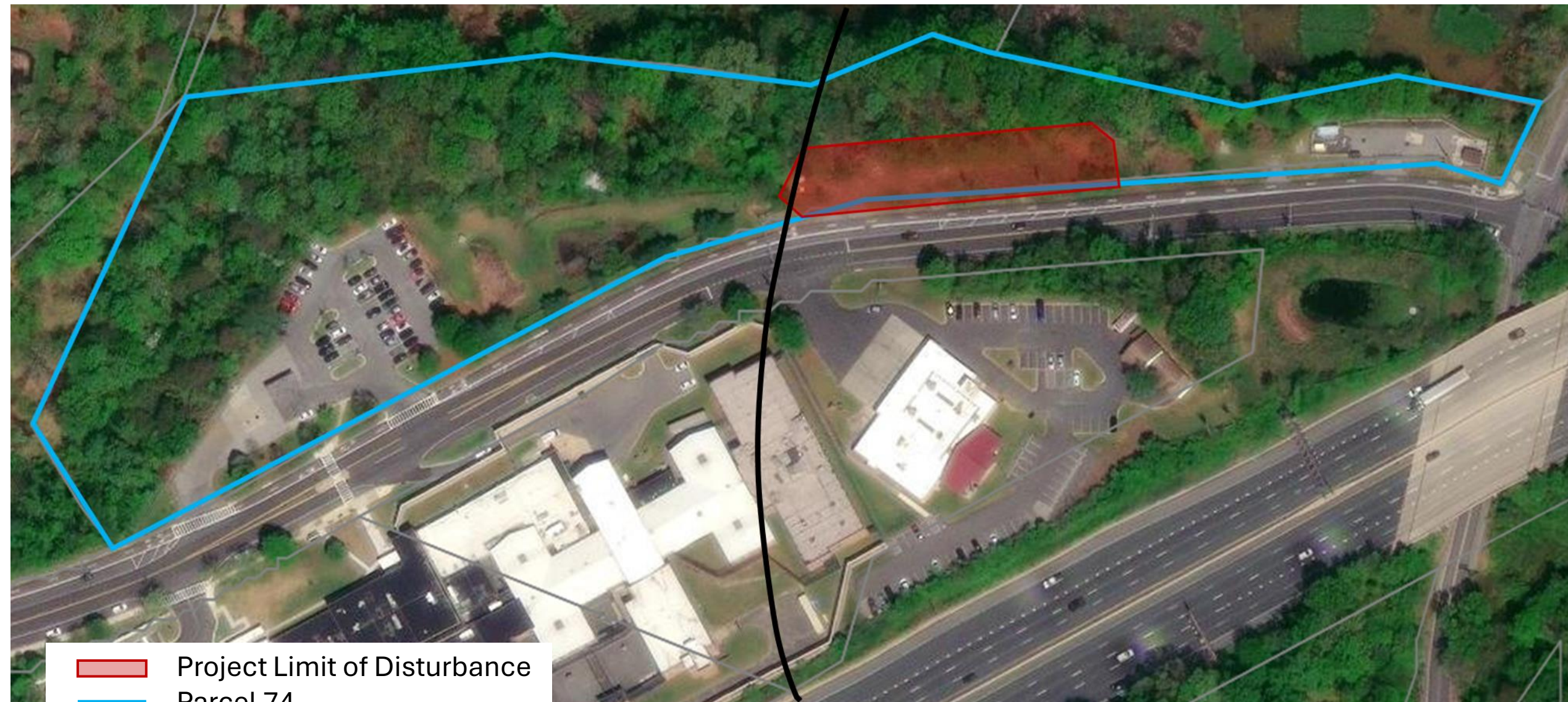
- 1\_Site Plan
- 2\_Conditional Approval Requirements County Responses








Critical Area Map of Parcel 74



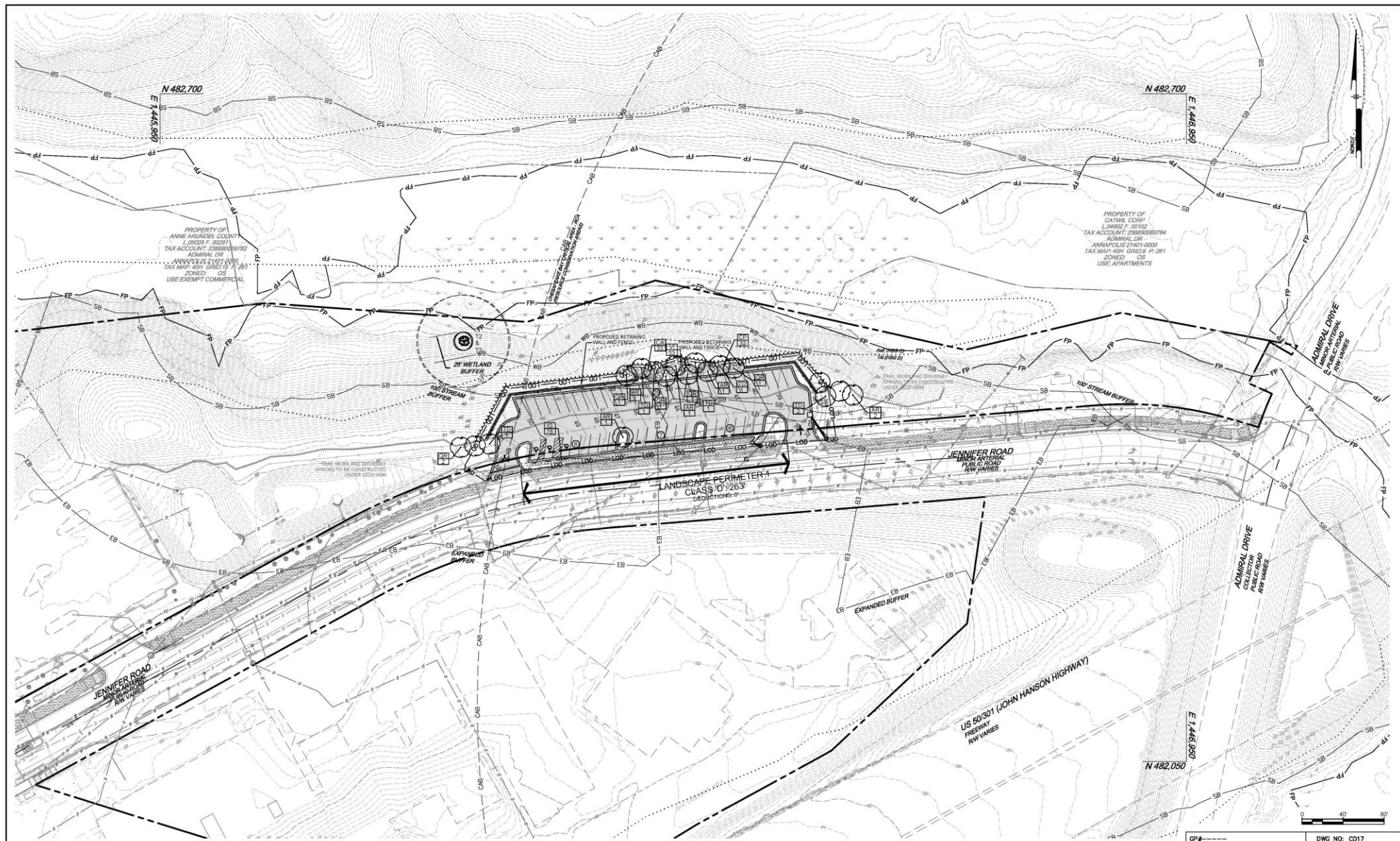


-  Project Limit of Disturbance
-  Parcel 74
-  Critical Area Boundary









LEGEND

PROPOSED GREEN AREA

PROPOSED SHADE TREE

PROPOSED SHRUB

## Proposed Mitigation

[illegible]

**Pennoni**

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ANNE ARUNDEL COUNTY  
DEPARTMENT OF PUBLIC WORKS

OCTOBER 22, 2025

FOREST CONSERVATION/CRITICAL AREA/  
LANDSCAPE PLAN

JENNIFER ROAD PARKING LOT  
CONSTRUCTION DOCUMENTS

TAX MAP 45H GRD 14 PARCEL 74  
ANNAPOLIS, MD ZIP CODE 21401, 3RD DISTRICT  
ANNE ARUNDEL COUNTY, MD

APPROVED	DATE
CHIEF ENGINEER	
APPROVAL	DATE
ASSISTANT CHIEF ENGINEER	

APPROVED	DATE
PROJECT MANAGER	
APPROVED	DATE
CHIEF, RIGHT OF WAY SERVICES	

SCALE: 1" = 40'
DRAWN BY: ---
CHECKED BY: ---
SHEET 17 of 11
PROJECT #: F580500
CONTRACT #: F580501

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Conditional Approval Requirements- County Responses:

**When reviewing projects of this nature, the Critical Area Commission must consider how the proposal addresses the requirements for conditional approval under COMAR 27.02.06. In order to qualify for consideration by the Commission for conditional approval, it shall be shown by the proposing or sponsoring agency that the project has the following characteristics:**

*B. (1) That there exist special features of the site or there are other special circumstances such that the literal enforcement of these regulations would prevent a project or program from being implemented;*

This project is almost entirely within the Expanded Buffer, has steep slopes and is partially in the Critical Area. This proposed project is a new satellite parking lot for the detention center which is across Jennifer Road from this site. There is an existing parking lot immediately adjacent to this project which has been expanded as much as possible. The Central Holding Processing Center (CHPC) which was opened in 2020, displaced existing parking. The existing parking lot on the north side of Jennifer Road west of the project site is undersized for this use. The initial impact of the loss of parking from the construction of the CHPC had the Department utilizing the garage at the hospital, the street, and spots at the fire station. Due to COVID, the full impact of this parking space loss was not realized, as certain activities at the department such as visits, client reporting, volunteer programs and services were very limited or cancelled. As we have now returned to full operations, our staff and our visitors struggle to find safe and suitable parking. The parking spaces requested will allow us to provide an appropriate amount of parking to match the activity going on at the facility on a daily basis. Due to the need for additional parking in the vicinity of the detention center, this site was identified, as there are no other available parcels in the surrounding area where parking could be developed. Strict enforcement of the Critical Area regulations would prevent this parking lot expansion and would negatively impact the ongoing needs of the detention center.

Alternative sites for the proposed parking lot project is constrained based on the existing pattern of development located in the project area and environmental features such as steep slopes and expanded Critical Area Stream Buffer. The proposed project site area was the most suitable location as it provided the best opportunity to minimize disturbance to steep slopes and the expanded buffer environmental features that are present throughout the area to be served by the project proposal.

*B. (2) That the project or program otherwise provides substantial public benefits to the Critical Area Program;*

This project proposes replanting on site in the form of 18 trees and 177 shrubs, as well as mitigation offsite. All of the proposed plantings shown on the mitigation plan are currently located within the expanded buffer and will provide enhanced habitat and water quality benefits in the surrounding watershed area. Further opportunities for offsite mitigation are currently being explored and evaluated. This project will control runoff with the proposed storm drain connection to the existing storm drain system, and its associated outfall. This site will also contribute to an existing County SWM project in this watershed.

*B. (3) That the project or program is otherwise in conformance with this subtitle;*

This project meets the mitigation requirements, and impacts to the expanded buffer and other resources have been minimized to the maximum extent possible. The proposed Forest Clearing is within the 20% allowable clearing limit. The project area avoids any disturbance to nearby non-tidal wetlands or its associated 25-foot buffer. The project is located outside of any sensitive species project review areas or potential FIDS habitat.

**The conditional approval request shall, at a minimum, contain the following:**

*C. (1) A showing that the literal enforcement of the provisions of this subtitle would prevent the conduct of an authorized State or local agency program or project;*

Without the requested relief from the proposed impacts to the expanded Buffer and the forest resources, this project would not be permitted. The project is needed in order to support the parking demands needed for the nearby Detention Center and facilitate daily activities carried out by the Detention Center.

*C. (2) A proposed process by which the program or project could be so conducted as to conform, insofar as possible, with the approved local Critical Area program or if the development is to occur on State-owned lands, with the criteria set forth in COMAR 27.02.05;*

This project has proposed mitigation for the proposed impacts in the form of onsite planting, as well as offsite mitigation for the impacts in the Critical Area Buffer, Lot Coverage exceedance and Forest Clearing. No impacts are proposed to existing wetlands or wetland buffers or other Habitat Protection Areas. All impacts have been minimized to the maximum extent possible.

*C. (3) Measures proposed to mitigate adverse effects of the project or program or an approved local Critical Area program or, if on State-owned lands, on the criteria set forth in COMAR 27.02.05.*

This project has limited the amount of forest clearing and steep slope disturbance by proposed retaining walls along the downhill sides of the project. On site planting has been provided in areas where there are no utility or retaining wall conflicts. The parking lot has been positioned as close as possible to the existing road and in an area that minimizes impacts to the nearby environmental features to the extent possible.