



# Maryland Board of Public Works

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## PUBLIC COMMENTS

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Meeting Date

OCTOBER 29, 2026

BOARD OF PUBLIC WORKS  
80 Calvert Street  
Annapolis MD 21401

## SECTION 1

COMMENTS SUBMITTED VIA BPW WEBSITE

## Department of General Services

Item: 67-EX

Michele Steward: Oppose

October 25, 2026

To: Maryland Board of Public Works

Re: October 29 Meeting — DDA Consulting Contracts, Item 67-EX

Dear Members of the Board,

I am writing about DDA's request for expedited approval of two consulting contracts focused on financial oversight and stakeholder engagement.

I welcome the idea of stronger oversight and accountability within DDA. Participants and families have been asking for these improvements for years. But before additional public funds are committed, I think there are some important questions that need to be answered.

For more than a month, the LTSSMaryland system has experienced serious problems affecting person-centered plans, service authorizations, and budget modifications. These are not minor inconveniences. When plans cannot be processed or budgets cannot be adjusted, people can lose access to services they depend on every day.

That brings me to my biggest concern.

Has DDA actually spoken with the people experiencing these problems before deciding what these new contractors should be investigating?

Maryland's FY2027 budget requires DDA to review its contract plans with stakeholders. I would like to know whether that has happened and, if so, who was involved and how their concerns were incorporated.

I would also like to know whether the financial review will examine the ongoing LTSSMaryland failures, payment and authorization discrepancies, and the costs associated with these problems. Will the findings be shared publicly? And will participants and families have a meaningful role in deciding which problems need attention?

We already know there are serious issues within the system. Families, providers, and support professionals have been documenting them for weeks. It makes little sense to hire consultants to identify problems without first listening to the people who have been reporting them.

I'm not opposed to these contracts. I want them to succeed. But before the state moves forward, I think we deserve a clearer understanding of what the contractors will be responsible for and whether participants and families have had a say in shaping that work. We need to make sure public money is being spent to address the problems people are actually experiencing.

I ask the Board to obtain answers to these questions before approving expedited procurement. If DDA cannot provide that information, I hope the Board will consider holding the request until it can.

Accountability should begin with listening to the people who are living with the consequences of the problems being investigated.

Thank you for your time and consideration.

Sincerely,

Michele Steward

Parent and Self-Directed Services Advocate

Anne Arundel County, Maryland

## Secretary

### Item 8

Dr. Dolph Druckman: Oppose

State tidal wetlands license (License #25-1148):

Regarding the recent favorable Maryland Department of the Environment (MDE) report recommending the issuance of a wetlands license, I am writing to express concern regarding the scope of MDE's review and to highlight that the application fails to demonstrate it is "good for Maryland" under several criteria specified in COMAR 23.02.04.09.

First, over the past 20 years, worldwide climate and public health research has highlighted significant and growing concern over the spread of vector-borne diseases, particularly in temperate and urban environments. In the last 10 years, published academic research on this topic has tripled. Beyond traditional international centers for public health research like Johns Hopkins University, Morgan State University has established a research focus in this locally significant topic (Morgan's Center for Climate Change and Health). Additionally, the CDC, WHO, and numerous other public health and scientific authorities have issued substantial guidance on the matter. This focus is both broad and critical.

During this same 20 years, the Chesapeake watershed has become home to the Asian Tiger Mosquito, an invasive tropical species capable of transmitting numerous viruses to humans and animals. Surveillance for vector-borne diseases and their vectors remains a longstanding priority for regional public health systems.

However, these risks concerning vector-borne diseases—fundamentally associated with wetlands—do not appear to have been assessed or contemplated in the application or in MDE's review. Promoting newly created wetlands as an absolute ecological benefit requires careful evaluation within the context of changing local vector-borne disease hazards. This is particularly vital in urban microenvironments where parallel goals aim to increase public exposure to the harbor, both recreationally and via new residential towers in the adjacent uplands.

On this basis, I urge the Board of Public Works (BOE) find that this application requires further analysis and expert review. There is a reasonable basis to conclude that new wetlands may create unaddressed public health hazards, particularly as this license seeks to increase public interaction at the harborfront.

Second, with regard to economic, developmental, recreational, and aesthetic values, each area faces direct negative impacts from:

The decrease in linear frontage along the harbor (as noted in the application);

The modification of a traditional harbor quayside into two tiered "promenades" (one of which functions as a basic dockfront), altering the historic harbor's operations with apparent

The exclusion of berthage for several tall ships and large military vessels.

The applicant's assertion that adjacent upland acreage significantly increases public access to the harborfront (despite the loss of linear frontage) is irrelevant to this application, just as comments regarding upland development plans have been excluded from consideration.

Preserving the historic function of this harbor to welcome and berth multiple large ships is central to whether this project is truly "good for Maryland," yet this aspect remains insufficiently addressed. Revised plans for the gangways and floating dockworks (termed promenades) were made public only within the past two weeks, and it is unclear whether these designs have been reviewed by engineers experienced in navigating and mooring large vessels.

In summary, caution and further analysis are necessary for a project that purports to serve the public interest when potential public health risks have not been evaluated and core harbor functions (vital to economic, aesthetic, and recreational values) are left incompletely in the current application .

## SECTION 2

### COMMENTS SUBMITTED VIA EMAIL



410.866.5313

PLFIT@486school.org

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1201 66th Street  
Baltimore, Maryland 21237



October 26, 2026

The Honorable Wes Moore, Governor  
The Honorable Brooke E. Lierman, Comptroller  
The Honorable Dereck E. Davis, Treasurer  
Maryland Board of Public Works  
c/o John Gontrum, Executive Secretary  
Louis L. Goldstein Treasury Building  
80 Calvert Street, Room 117  
Annapolis, Maryland 21401

## **RE: SUPPORT FOR ITEM 35-CGL - HAGERSTOWN SCHOOL RENOVATION**

October 29, 2026 Agenda | DGS Grant 23-507 | \$750,000

Dear Governor Moore, Comptroller Lierman, and Treasurer Davis:

On behalf of Plumbers and Steamfitters Local Union No. 486, I respectfully urge approval of Item 35-CGL, the \$750,000 capital grant agreement for the Hagerstown School Renovation project. This investment supports the modernization of our Western Maryland training facility at 1301 West Washington Street in Hagerstown and the skilled workforce on which Maryland's employers and communities depend.

The project builds on an apprenticeship tradition dating to 1941. Our Hagerstown program serves Washington County and surrounding communities, combining classroom and hands-on instruction with paid employment. Apprentices gain technical skills in plumbing, steamfitting, HVACR, gasfitting and welding while preparing for industry credentials and licensure. The school also supports continuing education for experienced workers, helping them maintain qualifications and keep pace with changing building systems and technologies.



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The renovation addresses the facilities needed to sustain that work: new classrooms, improvements to existing instructional spaces and essential capital equipment. Modern teaching and shop environments strengthen the connection between training and the demands of actual jobsites. For Western Maryland residents, the project supports access to an earn-while-you-learn pathway to family-sustaining careers. For contractors and public and private owners, it helps develop the qualified workforce needed to construct, operate and maintain safe, reliable buildings and infrastructure.

The General Assembly authorized this \$750,000 appropriation in the Maryland Consolidated Capital Bond Loan of 2023. The grant application was initially submitted in October 2024. During 2026, our project team worked through successive requests for revisions and supporting documentation, including clarification of the grantee's legal name. In September, the team was advised that the documents were moving to legal review. The Department of General Services now recommends that the Board enter into the grant agreement and identifies the grantee as Plumbers and Steamfitters Local Union No. 486 Joint Journeyman and Apprentice Holding Company, Inc.

The agenda specifies that no matching funds are required and confirms the grantee's good-standing status at the time of submission. Approval would advance an existing legislative commitment to a practical workforce-development investment. We appreciate the work of the General Assembly, the Department of General Services and the Board in moving this project through the capital-grant process.

We respectfully request your favorable action on Item 35-CGL. Thank you for your consideration and for supporting apprenticeship opportunities and the skilled trades in Western Maryland.

Sincerely,

Pasquale Petrovia  
Business Manager  
Plumbers and Steamfitters Local Union No. 486





October 26, 2026

The Honorable Wes Moore, Governor  
The Honorable Brooke E. Lierman, Comptroller  
The Honorable Dereck E. Davis, State Treasurer  
Board of Public Works  
Goldstein Treasury Building  
Room 117  
80 Calvert Street  
Annapolis, MD 21401

RE: Tidal Wetlands Case No. 25-1148

Dear Governor Moore, Comptroller Lierman and Treasurer Davis:

The [Inner Harbor Coalition](#) (IHC) requests the Board of Public Works to defer action on Tidal Wetlands Case No. 25-1148 for many substantive reasons as outlined below:

1. **IHC has appealed the decision of the Maryland Department of the Environment (MDE) not to reopen the period for public comment and is awaiting their response.**
2. **The plans submitted by MCB HP Baltimore LLP to MDE to support the permit application are preliminary and subject to significant change.** The plans assume and are based upon the demolition of the existing Harborplace pavilions and amphitheater, which demolition is not certain. In fact, the pavilions, amphitheater and promenade

are contributing resources within the state- and federally certified Baltimore National Heritage Area. Under Financial Institutions Article Section 13-1112 (b) units of State government that conduct or support activities affecting a certified heritage area shall:

(1) Consult, cooperate, and to the maximum extent feasible, coordinate their activities with the unit or entity responsible for the management of each certified heritage area;

(2) To the maximum extent practicable, carry out the activities of the unit in a manner that is consistent with the approved management plan for the certified heritage area; and

(3) When conducting a review of activities under §§ 5A-325 and 5A-326 of the State Finance and Procurement Article, assure that the activities will not have an adverse effect on the historic and cultural resources of the certified heritage area, **unless there is no prudent and feasible alternative.**

State funds in three tranches (\$7.5, \$30 and \$34.4 million) have been appropriated to fund the project for which this license is being sought. No such consultation with the Baltimore Heritage Area Association has taken place nor has there been any attempt by the state Department of General Services (DGS) to explore prudent and feasible alternatives to the proposed work. The potential adverse impacts on the National Register eligible pavilions, amphitheater and promenade have not been considered as required by law. Only preliminary plans have been submitted to MDE and the Maryland Historical Trust (MHT) for assessment of adverse effects on historic and cultural properties. 100% construction documents were to have been completed by October 9, 2026. Any work undertaken under the license, including raising the grade of the promenade by roughly three feet, must not diminish the reuse potential of the pavilions and that has not been demonstrated in the plans submitted to MDE in part because they assume the demolition of the pavilions and amphitheater. Moreover, as reported by the media, contrary to public pledges made to secure project support, MCB officials now say they plan to demolish the National Register eligible pavilions and amphitheater as part of the larger 'Park and Promenade' initiative

funded by the state before securing financing for the replacement structures.

3. **Many other particularly important questions concerning economic, cultural and environmental effects remain unclear and unanswered.** How does this project work impact the potential for visiting ships and their significant positive cultural and economic impacts? What is the future disposition of the USS Constellation National Historic Landmark? Will there be a credible protocol for regular cleaning and removal of the large amounts of debris which will be trapped by new floating piers and wetlands creating unnavigable water? Will there be an assessment and plan for mitigating the potential for disturbance of toxic substances in air, land and water?
4. **BPW should not act before the Baltimore City Circuit Court decides on IHC's complaint filed September 22, 2026, charging that the City of Baltimore and MCB violated the Maryland Constitution, City Charter, Zoning Code and City Code in their actions.**
5. **As late as 2022 Waterfront Partnership and the City envisioned implementing only "state of good repair" capital improvements to the promenade not the wholesale redevelopment and reconfiguration proposed by MCB to support their speculative mixed-use development which may not materialize.** It was only when MCB entered the picture in 2023 that the drive to make more aggressive and sweeping changes was proposed to support MCB's overdevelopment of public parkland with a mixed-use high-rise complex of four new buildings with 900 apartments, retail and office uses. The two projects are inseparable and interdependent: but for MCB's mixed-use project the proposed promenade project and this license would not be necessary at this time; but for the promenade project the mixed-used overdevelopment will not take place.
6. **The construction funds- most if not all apparently to be provided by State capital budget appropriation- are not yet in place.** Based

on permit applications for the work submitted by MCB to the City of Baltimore the total construction cost estimates for the project appear to be \$125-\$150 million, and only \$71.9 million has been appropriated.

To summarize, there are many substantive reasons why action on the wetland license should be deferred unless and until the granting of the license is determined to be in the best interest of the state in conformance with COMAR 23.02.04.09. Such a determination cannot be made unless and until IHC's appeal of MDE's decision has been settled; the required consultations concluded; the questions raised are answered; the court has ruled; the interdependency of the promenade and mixed-used development projects recognized; and the construction funds are in place.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Pencek', with a stylized, flowing script.

William Pencek, Chair

Cc:

Adam Genn, MCB Real Estate  
Dan Taylor, Waterfront Partnership of Baltimore  
Bill Ferguson, Maryland Senate  
Luke Clippinger, Maryland House of Delegates  
Mark Edelson, Maryland House of Delegates  
Robbyn Lewis, Maryland House of Delegates  
Brandon Scott, Mayor, City of Baltimore  
Zeke Cohen, Baltimore City Council  
Zach Blanchard, Baltimore City Council  
Elizabeth Hughes, Maryland Historical Trust  
James Bond, Baltimore Heritage Area Association  
Shauntee Daniels, Baltimore Heritage Area Association  
Brent Leggs, National Trust for Historic Preservation  
Nicholas Redding, Preservation Maryland  
Johns Hopkins, Baltimore Heritage



## **Comments on Wetlands License 25-1148**

October 28, 2026

Maryland Board of Public Works Wetlands Administration Louis L. Goldstein Treasury  
Building 80 Calvert Street Annapolis, Maryland 21401

### **Re: Tidal Wetlands License 25-1148, MCB HP Baltimore LLC, Inner Harbor Park and Promenade**

Dear Members of the Board:

On behalf of Sail Baltimore, I am writing to offer our comments on Tidal Wetlands License 25-1148, submitted by MCB HP Baltimore LLC for the Inner Harbor Park and Promenade. Sail Baltimore supports the redevelopment of Harborplace and recognizes the considerable work that has gone into this design. The proposed bulkhead and raised site elevations will help protect the Inner Harbor from sea-level rise and flooding, and the new promenade will bring pedestrians closer to the water than ever before. These are meaningful public benefits, and we want to see them realized.

At the same time, the features that bring people closer to the water create real trade-offs for the ships that visit Baltimore. Our comments focus on those trade-offs and on how they can be resolved so that the Inner Harbor remains a welcoming port of call.

We also want to be clear that these concerns are not new, and that Sail Baltimore has sought to raise them early and constructively. We first met with MCB in April 2025 to share our concerns about preserving large-ship berthing along the West Wall. When the permit drawings were made public in May 2026, we reached out to MCB to coordinate proactively on the in-water design. It was only this week that MCB shared many of the details of how ships would moor under the proposed configuration, details that are not required to be included in the wetlands permit application. We are submitting these comments now because this is the first point at which we have had enough information to evaluate the design fully.

The design places sections of lower floating promenades along the Inner Harbor West Wall, in the area where large vessels have traditionally berthed. The State and the City have invested millions of dollars in maintenance dredging to keep a deep approach channel open to the West Wall for exactly this purpose. That access has supported some of the most successful public events in Maryland's history. According to economic impact studies by Forward Analytics for the Living Classrooms Foundation, Sail250

(2026) drew 608,000 visitors and generated \$114.5 million in economic impact; Maryland Fleet Week and Flyover Baltimore (2024) drew 150,000 visitors and generated \$63 million; the Star-Spangled Spectacular (2014) drew 1.43 million visitors and generated \$164.1 million; and Star-Spangled Sailabration (2012) drew 1.54 million visitors and generated \$166.1 million. Each of these events depended on large naval and tall ships being able to tie up safely at the West Wall.

MCB has been a constructive partner in this discussion and has shown us how ships could potentially dock under the proposed design. We appreciate that effort. However, their approach is highly unconventional. Mooring ships alongside a mixture of fixed and floating docks at multiple heights would require specialized fenders and gangways that visiting ships do not carry and that are not currently available in the region. Even with that equipment, the configuration may not accommodate certain classes of vessels, including U.S. Navy ships, which operate under strict mooring and access requirements. To make sure our concerns were well-founded, Sail Baltimore engaged an independent third-party engineer, AML, to peer review the submission. Their review corroborated the concerns we have raised about the mooring design.

In summary, our specific concerns with the proposed design are as follows:

- **Loss of conventional berthing.** The floating promenade occupies the area along the West Wall where large vessels have traditionally moored, removing the straightforward alongside berth that visiting ships rely on. Larger vessels will be forced to moor on a mixture of fixed and floating docks at multiple heights.
- **Specialized equipment.** Mooring under the new configuration would require specialized fenders and gangways that visiting ships do not carry and that do not currently exist in the region, and the design does not yet identify who would procure or maintain them.
- **Wind Ratings** - The current design includes mild-weather moorings (Unified Facilities Criteria Type I). It calls for vessels to be relocated from the lower floating promenade before any storm bringing 35-knot winds sustained for 30 seconds.
- **Vessel compatibility.** The configuration may not accommodate certain classes of ships, including U.S. Navy vessels, which could exclude Baltimore from future naval visits and Fleet Week events.
- **Operational feasibility.** The mooring approach has not yet been reviewed by the tug operators, line handlers, and ship operators who would need to use it.
- **Return on public investment.** If large ships cannot berth at the West Wall, the State's and City's investment in maintaining the approach channel, and the economic benefit of the events it supports, would be put at risk.

We believe these issues can be resolved through collaboration, and we respectfully ask the Board to approve the license subject to the following conditions:

1. MCB partners with Sail Baltimore to have the proposed mooring configurations reviewed by local tug operators, line handlers, the U.S. Navy, and other representative ships that frequently visit Baltimore, and secures their confirmation that they are comfortable with the configuration before construction of the in-water elements proceeds.

2. If required, MCB procures the specialized fenders and gangways needed to moor visiting ships under the new configuration, and the Waterfront Partnership of Baltimore assumes responsibility for maintaining them.

These conditions would allow the project to deliver its resiliency and public access benefits while protecting Baltimore's ability to host the ships and events that have long defined the Inner Harbor. Sail Baltimore is ready to help convene the maritime partners involved and to work with MCB toward a configuration that serves everyone.

Thank you for your consideration and for your stewardship of Maryland's waters.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Brendan Robinson', with a long, sweeping horizontal stroke extending to the right.

Brendan Robinson, President, Board of Directors, Sail Baltimore

October 27, 2026

Maryland Board of Public Works  
State of Maryland

RE: Tidal Wetlands License No. 25-WL-1148  
Inner Harbor Park and Promenade Redevelopment  
MCB HP Baltimore LLC

Dear Members of the Board:

AMI Consulting Engineers, P.A. has reviewed the proposed Inner Harbor Park and Promenade redevelopment on behalf of Sail Baltimore, with particular attention to the proposed maritime infrastructure and its ability to accommodate existing vessel operations along the West Wall. Our review considered the operational requirements for large naval vessels and tall ships, including berthing dimensions, water depths, vessel access, and mooring conditions. Based on the available permitting documents and information provided by Sail Baltimore, we have identified several concerns regarding the proposed facilities' ability to maintain existing maritime functions. We respectfully submit the following engineering statement for the Board's consideration in its review of Tidal Wetlands License No. 25-WL-1148.

Engineering Statement  
Inner Harbor Park and Promenade Redevelopment  
Tidal Wetlands License No. 25-WL-1148

We have reviewed the proposed Inner Harbor Park and Promenade Redevelopment, specifically the Lower Floating Promenade, Floating Day Docks, and Conway Pier, to evaluate their potential impacts on existing maritime operations along Baltimore's Inner Harbor West Wall.

Based on the available permitting documents and operational requirements provided by Sail Baltimore, we concur that the proposed improvements have not been demonstrated to adequately accommodate the large naval vessels and tall ships historically berthed at this location. Our primary concerns are summarized below.

#### Berthing Length and Water Depth

Sail Baltimore has identified a need for at least 500 linear feet of continuous berth with a minimum water depth of 25 feet. The proposed Lower Floating Promenade extends approximately 620 feet but is in water reportedly ranging from 12 to 24 feet deep. Conversely, the proposed Floating Day Docks are in deeper water but provide only 230 feet of berthing length. The proposed Conway Pier further restricts the available berthing envelope along the West Wall.

As configured, the proposed facilities do not appear to provide the combination of water depth, unobstructed berth, and vessel clearance necessary to accommodate the larger visiting vessels.

#### Vessel Access and Gangway Elevations

Visiting vessels currently utilize gangway landing elevations of approximately +6 to +7 feet. The proposed floating promenade, reportedly at approximately +2 feet, introduces an additional 4 to 5 feet of vertical difference relative to existing landing arrangements. This may result in excessive gangway slopes, creating access and safety concerns for crews and visitors.

The proposed configuration should demonstrate acceptable gangway geometry for representative vessels throughout the anticipated range of operating conditions.

#### Mooring Criteria and Operational Limitations

The proposed floating docks reportedly utilize a UFC Mooring Service Type I classification, which is associated with relatively mild environmental conditions. Sail Baltimore has identified operational restrictions requiring vessel relocation in advance of winds exceeding approximately 35 knots.

These limitations could significantly affect scheduled vessel visits, increase relocation costs, and reduce the reliability of the West Wall for maritime events. The selected mooring criteria should reflect the anticipated vessel sizes, environmental conditions, and operational requirements rather than impose substantially reduced operating limits.

#### Mooring and Fendering Infrastructure

The available permitting documents do not sufficiently establish the capacity and suitability of the proposed mooring and fendering systems for large naval vessels and tall ships.

The proposed floating docks must be capable of accommodating vessel berthing and mooring forces, including the effects of differential movement between the vessels and floating structures. Appropriate design documentation should demonstrate adequate mooring hardware, fendering, structural capacity, and load transfer through the floating dock restraint systems.

### Engineering Conclusion

Based on our review, we concur with Sail Baltimore's concerns that the proposed Lower Floating Promenade and Conway Pier could substantially reduce the existing large-vessel berthing capabilities of the West Wall.

The proposed facilities have not been demonstrated to satisfy the operational requirements for water depth, continuous berth, vessel access, and mooring capacity necessary to support existing maritime functions.

We support Sail Baltimore's recommendation that the proposed in-water improvements be reconsidered to preserve these capabilities. At a minimum, any revised configuration should demonstrate compliance with the established large-vessel berthing requirements and be developed in coordination with Sail Baltimore and other affected maritime stakeholders.

Respectfully Submitted,



Chase Butts, PE  
Structural Engineer / Project Manager

Reviewed by



Chad Scott, PE  
Principal Engineer