



2020

Montgomery Planning | Functional Planning & Policy Division

2020 County Growth Policy

Planning Board Work Session #1

June 18, 2020



Today's Work Session

- 3.1 Policy name change
- 4.1 Creation of School Impact Areas
- 4.2 Annual School Test – guidelines
- 4.3 Annual School Test – individual school level
- 4.4 Annual School Test – adequacy standards
- 4.5 Annual School Test – length of test results
- 4.6 Utilization Report – countywide reporting
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Chapter 3. Policy Recommendation

County Growth Policy



County Growth Policy

R3.1

Change the name of the Subdivision Staging Policy to the County Growth Policy.

- With a changing growth context more focused on infill and redevelopment, and a recognized need to grow the economy and provide more attainable housing, this policy must be more than a tool for ensuring infrastructure keeps pace with development.
- It must be a growth management tool that helps ensure growth comes in the form, amount and locations we need and desire.



County Growth Policy

R3.1 Comment Summary

- General support for changing the name as it makes it clearer and more accessible to stakeholders.
- Incorrectly biases the conversation towards growth. Name should reflect the balance between desire for growth and need of adequate public facilities.
- MCCPTA supported the change but expressed concern that the policy should not veer too far into housing and growth priorities that are addressed elsewhere in county policies and zoning. It should remain focused on making sure infrastructure can support our growing population.



Chapter 4. Schools Element Recommendations

School Impact Areas



School Impact Areas

R4.1

Classify county neighborhoods into School Impact Areas based on their recent and anticipated growth contexts. Update the classifications with each quadrennial update to the County Growth Policy.

Classifications are based on the:

- Amount of new housing
- Type of new housing (single-family vs. multifamily)
- Amount of enrollment growth



School Impact Areas

Infill Impact Areas

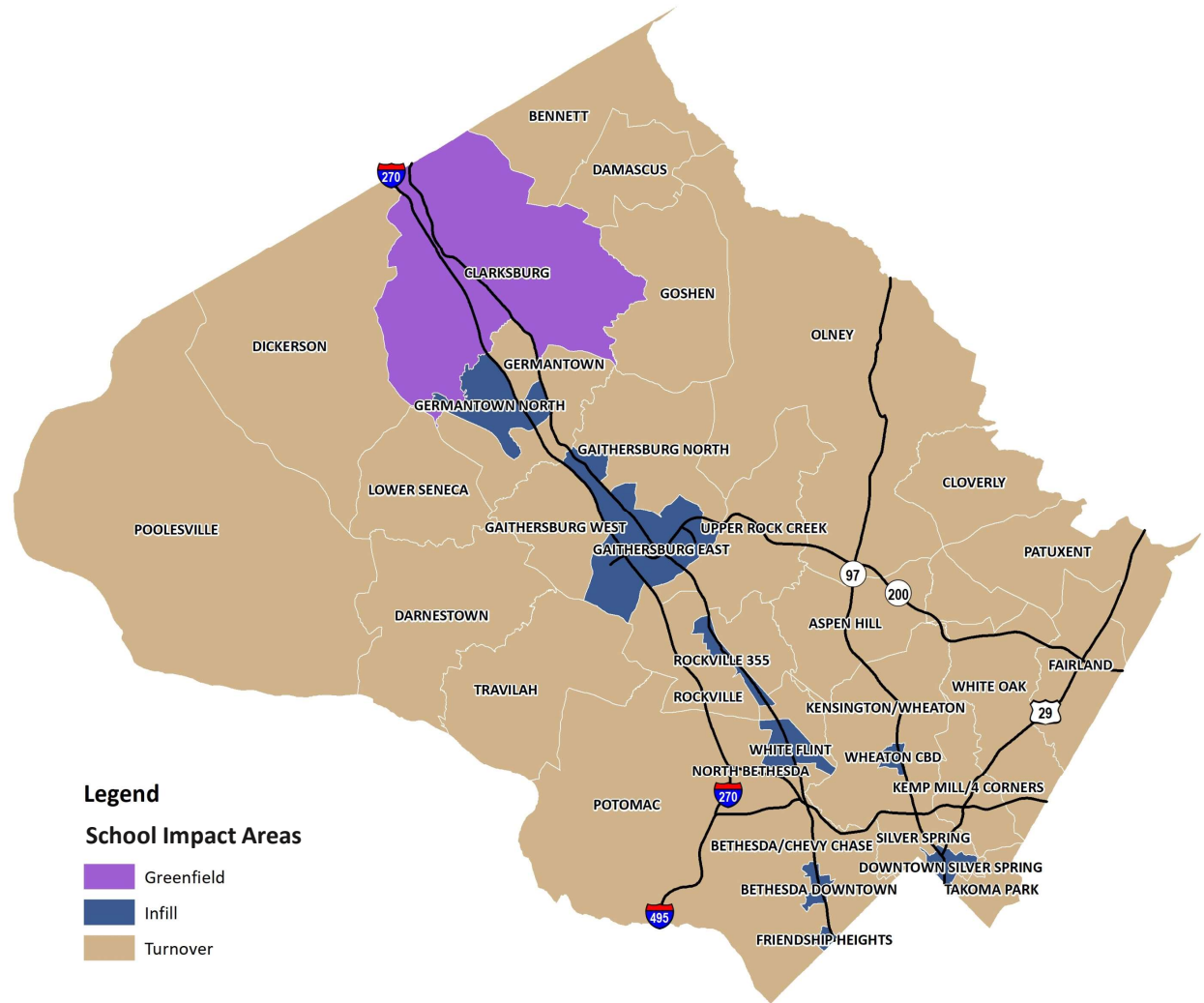
- Areas with high housing growth that is predominantly multifamily, which generates few students on a per unit basis

Turnover Impact Areas

- Areas with low housing growth where any enrollment growth is largely due to turnover of existing single-family units

Greenfield Impact Areas

- Areas with high enrollment growth due largely to high housing growth that is predominantly single-family



School Impact Areas

R4.1

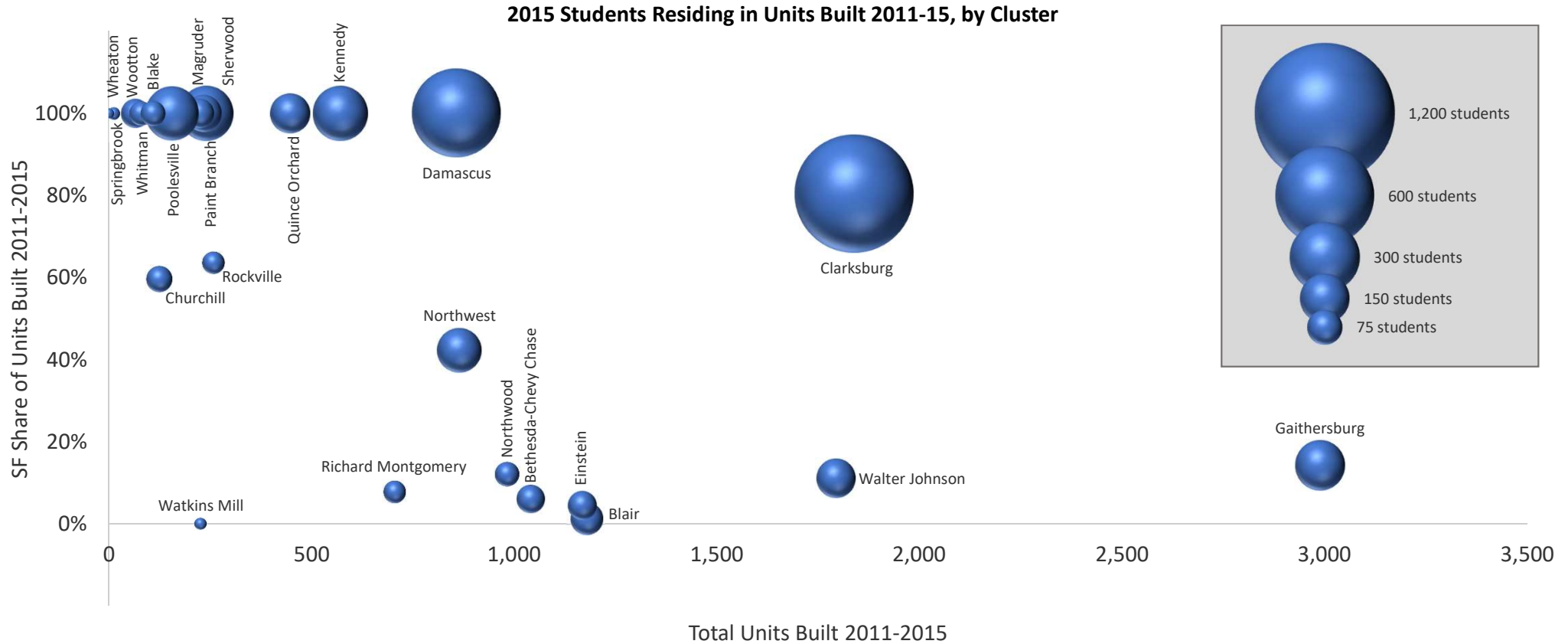
Identified 35 planning areas corresponding to aggregations of *census tracts*

- Started with Planning Areas currently used for certain housing policies and the Housing Needs Assessment
- Modified the Planning Areas to pull out Downtown Bethesda, Downtown Silver Spring, Wheaton CBD, Friendship Heights and White Flint, and other census tracts exhibiting different growth contexts

The planning areas were grouped into three School Impact Areas, which have implications on how the schools element of the County Growth Policy and related funding mechanisms are applied.



School Impact Areas

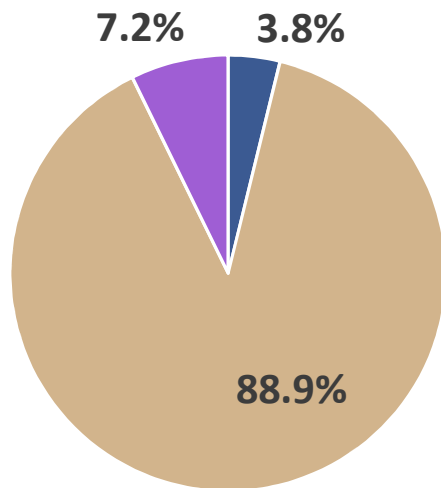


New Development vs. Turnover

- A review of new dwelling units built (excluding replacement homes) between 2011 and 2015 revealed:

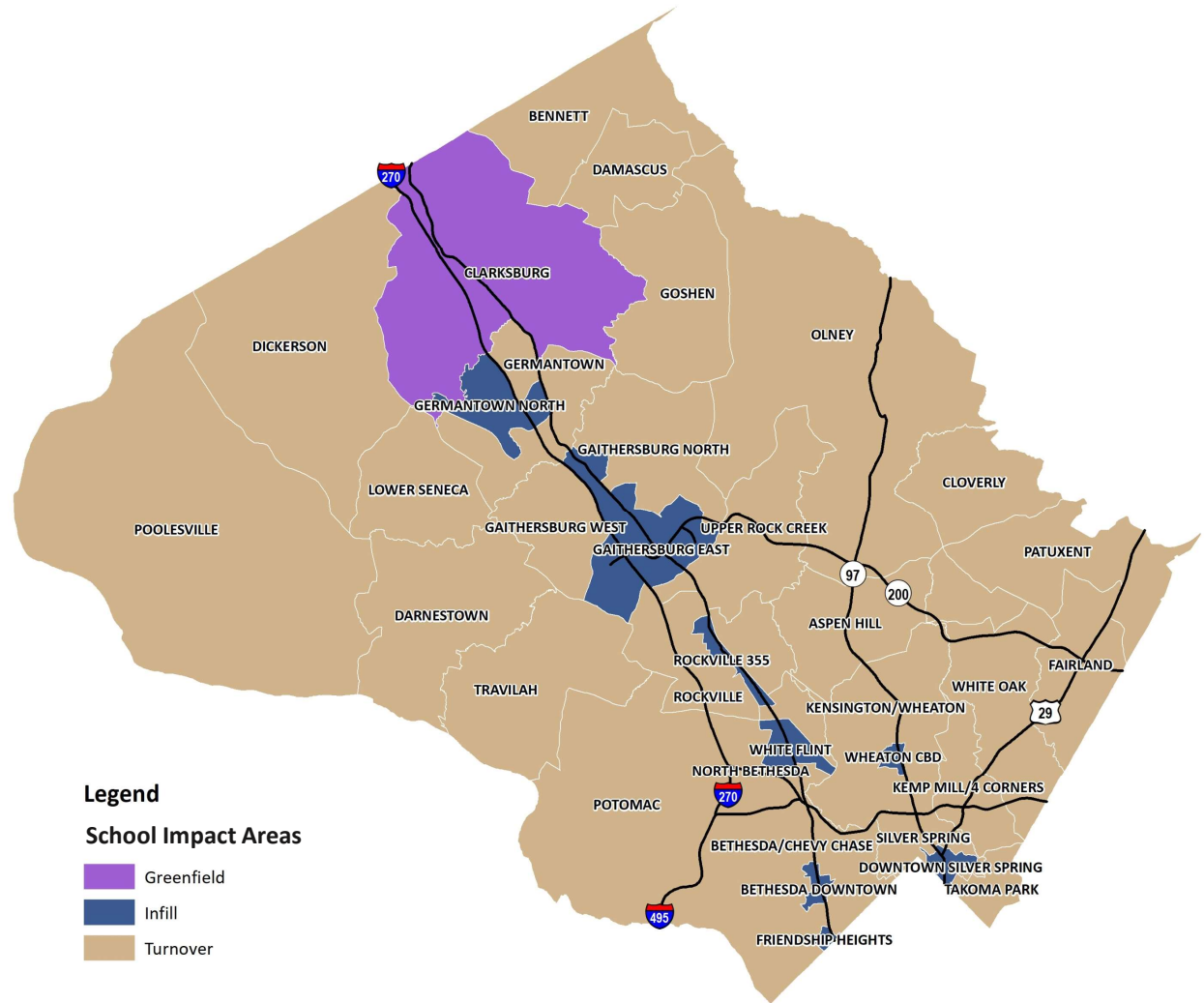
Unit Type	Units Built	Share of 2010-15 Enrollment Growth	
Single Family Detached	2,606 (16.1%)	10.9%	19.1%
Single Family Attached	3,403 (21.0%)	8.2%	
Multifamily Low-rise	3,498 (21.6%)	2.6%	4.3%
Multifamily High-rise	6,660 (41.2%)	1.7%	
TOTAL	16,167	23.3%	

Land Area Shares

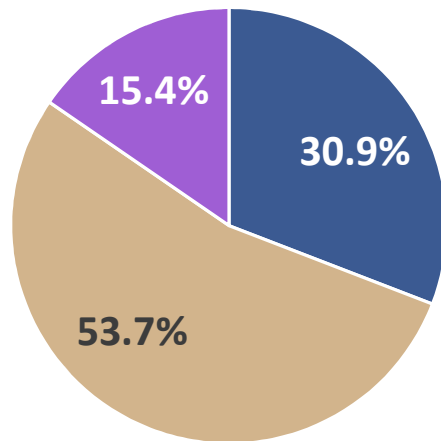


■ Infill ■ Turnover ■ Greenfield

Greenfield	23,474 acres
Infill	12,420 acres
Turnover	288,504 acres

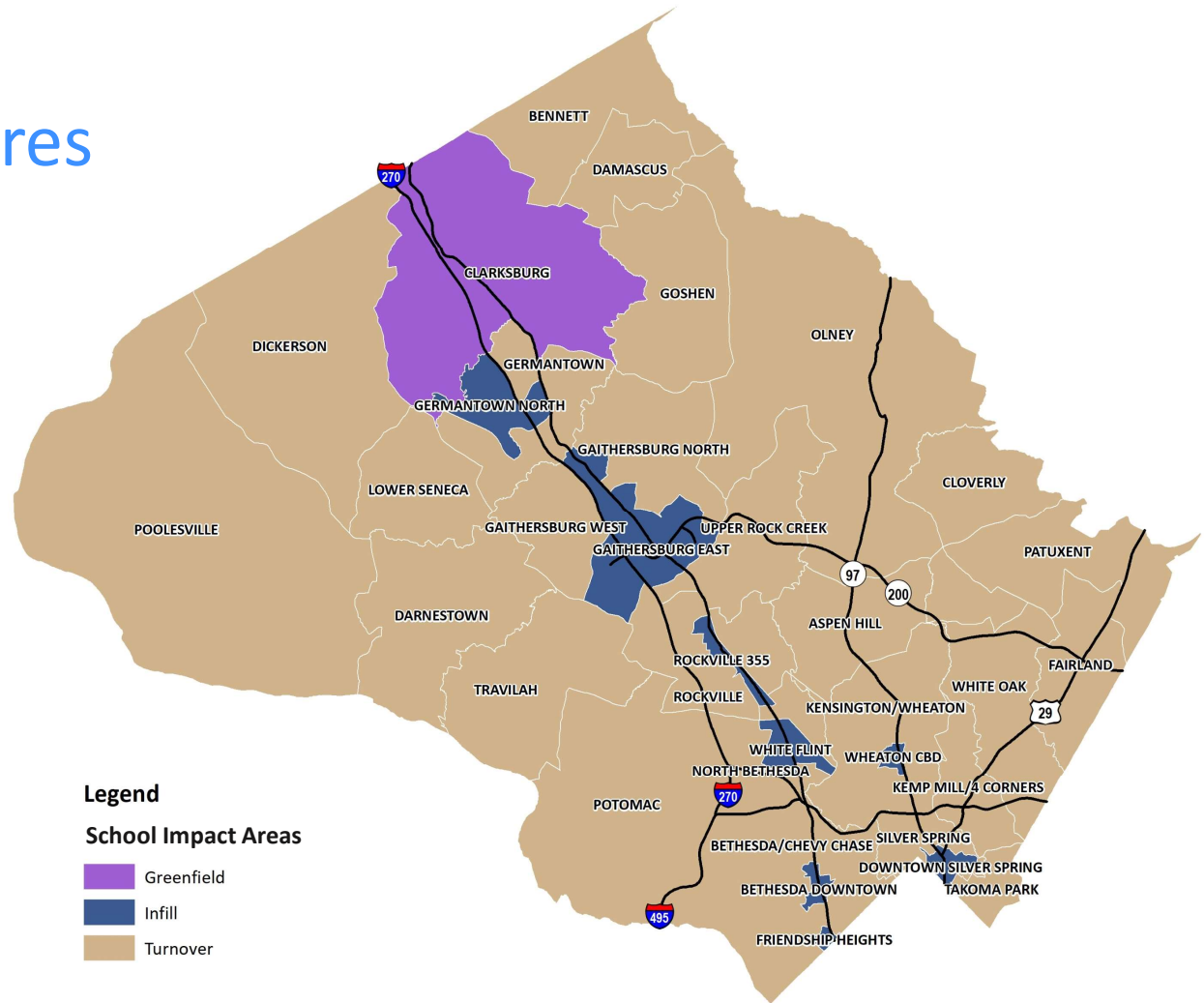


Population Growth Shares 2013-2018

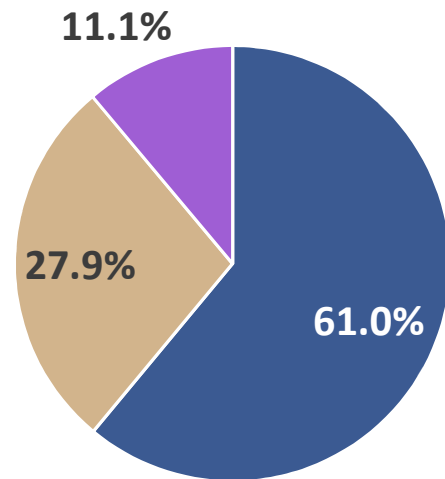


■ Infill ■ Turnover ■ Greenfield

Greenfield	+7,812 people
Infill	+15,634 people
Turnover	+27,213 people

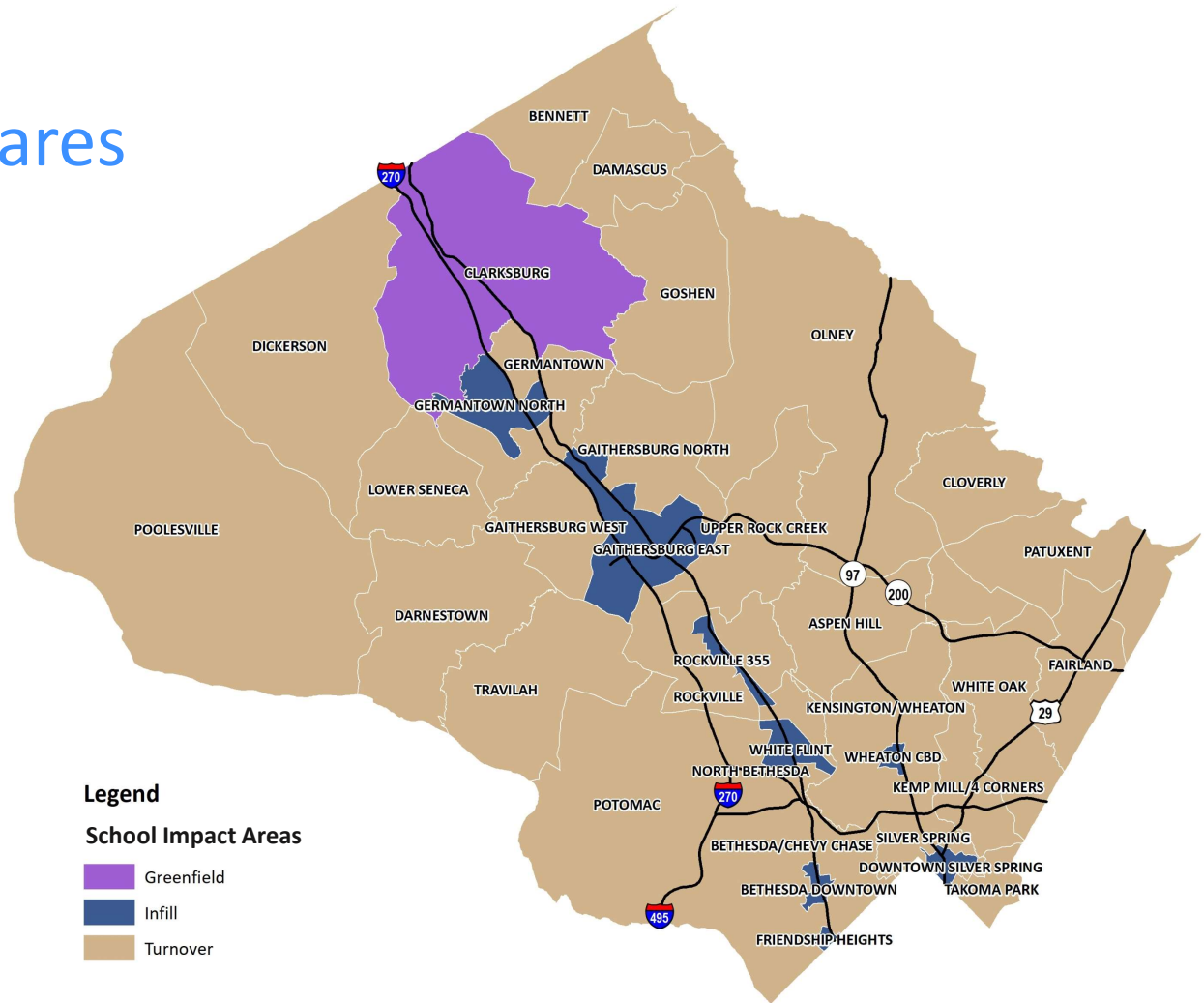


Housing Unit Growth Shares 2013-2018

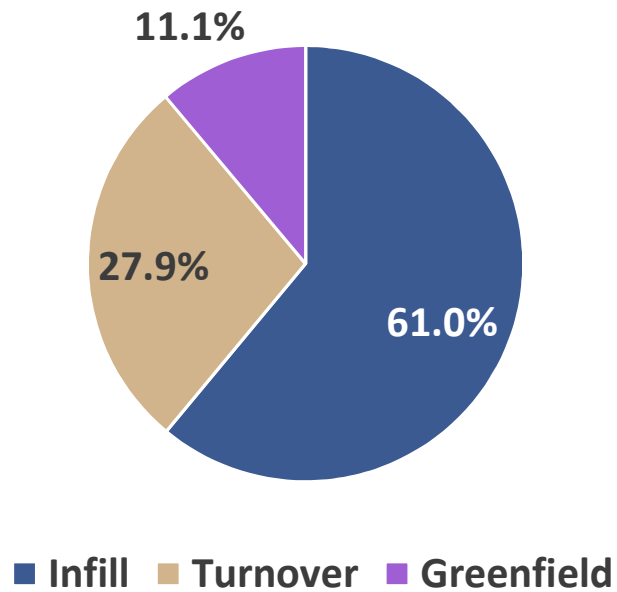


■ Infill ■ Turnover ■ Greenfield

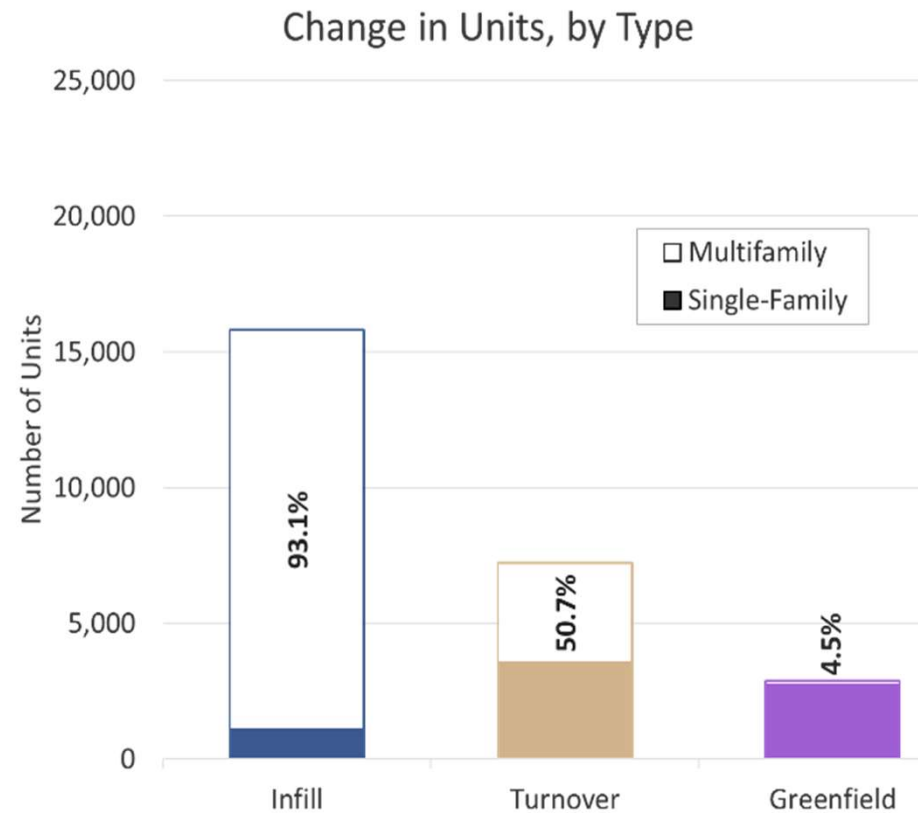
Greenfield	+2,880 units
Infill	+15,826 units
Turnover	+7,224 units



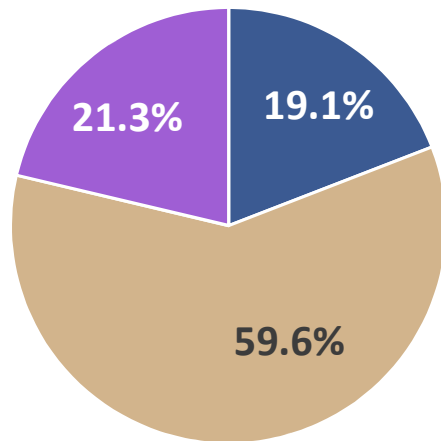
Housing Unit Growth Shares 2013-2018



Greenfield	+2,880 units
Infill	+15,826 units
Turnover	+7,224 units



Enrollment Growth Shares 2013-2018

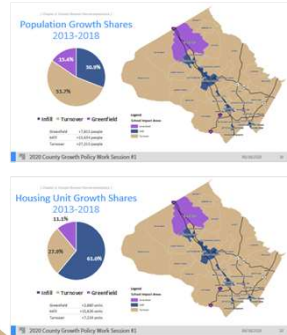
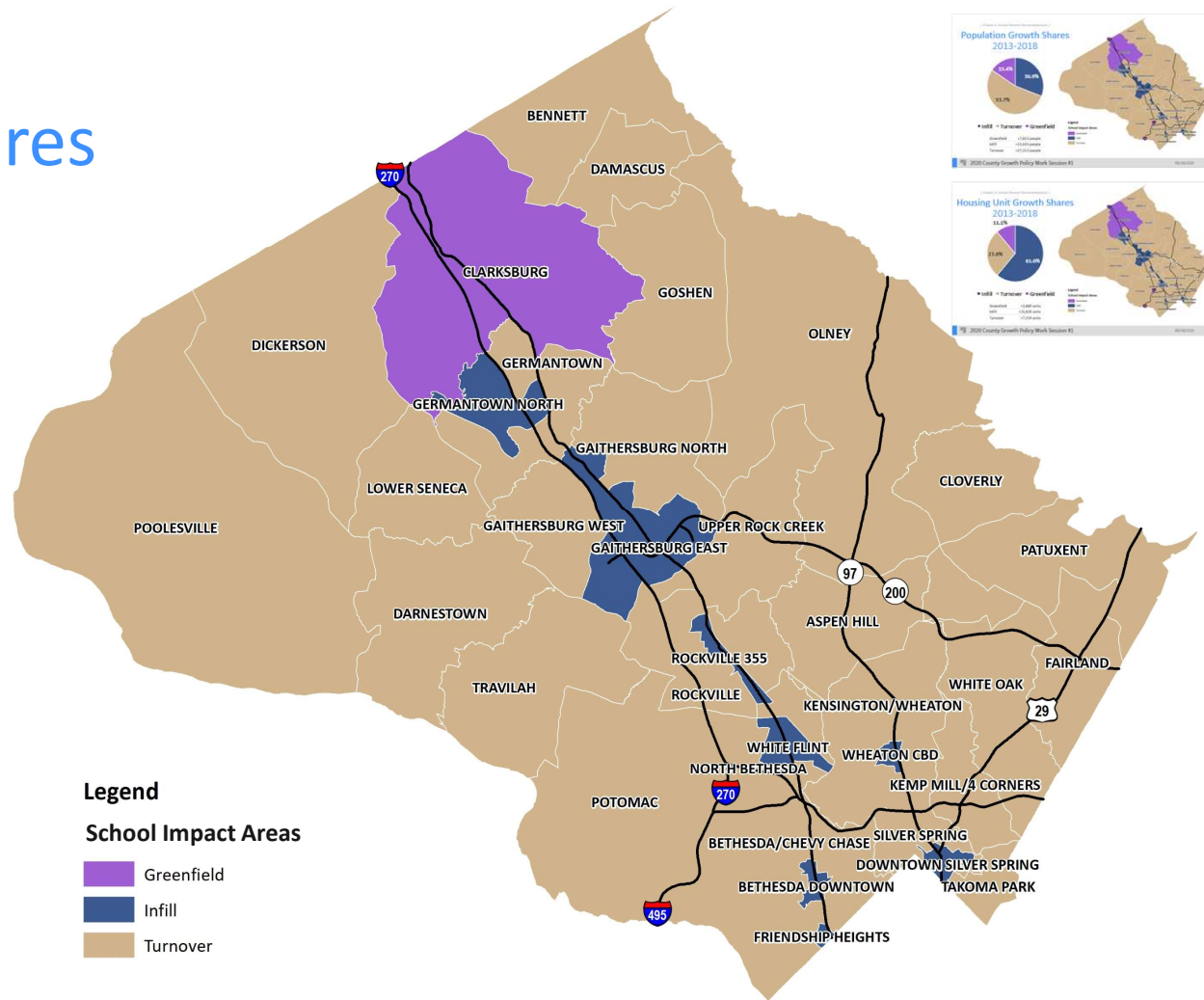


■ Infill ■ Turnover ■ Greenfield

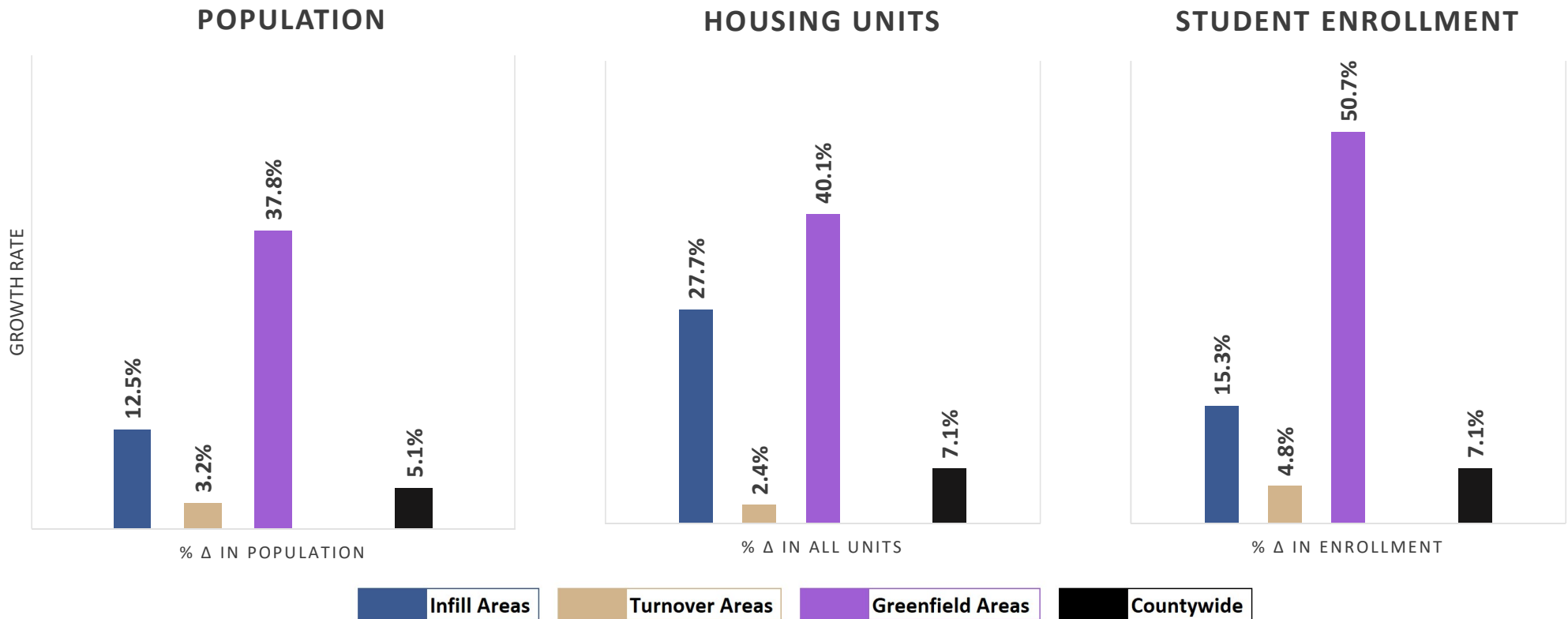
Greenfield	+2,237 students
Infill	+2,010 students
Turnover	+6,263 students

Legend

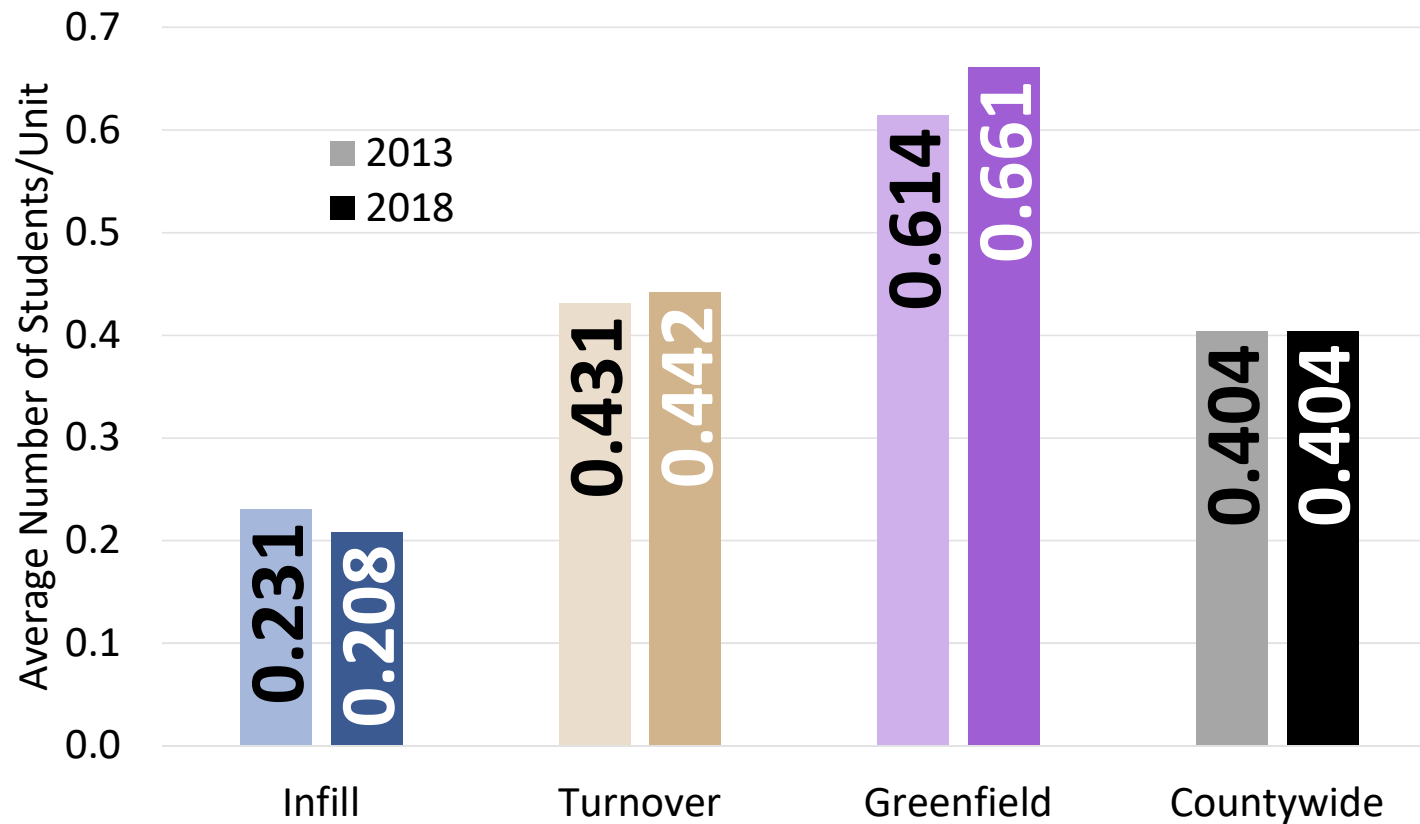
School Impact Areas



School Impact Area Growth Rates, 2013-2018



School Impact Area Student Generation Rates



School Impact Areas

R4.1 Comment Summary

- Generally, people have been supportive of taking a context-sensitive approach to the Policy.
- ULI was supportive of this approach, advocating that the county move “from a ‘one size fits all’ approach to a more context-based, context sensitive approach.”
- Suggestion that all activity centers need to be included in the infill category and that the Planning Board should have the authority to add or delete activity centers based upon approved master plans.
- Consideration of a fourth hybrid category that encompasses a combination of both turnover and infill. Such areas behave differently from the other three and have unique challenges and needs.
- Some concern that the designations are primarily used to discount the impact taxes, and in areas where meeting the demands of our schools is getting increasingly more difficult and expensive.



School Impact Areas

R4.1 Comment Summary

- We did receive a question pertaining to categorization of Census tract 7012.14.
 - The tract includes the recently adopted Grosvenor-Strathmore Metro Area Minor Master Plan's area in its entirety.
 - The tract is currently part of the North Bethesda Planning Area, which is identified as Turnover. If it were moved into the White Flint Planning Area, it would change to Infill and have no impact on the classification of any other area.
 - Historically, the tract is reliably a Turnover Impact Area, with little housing growth. But the pipeline is more in consistent with Infill Impact Areas, with a large number of approved multifamily units.
 - Options to consider:
 1. Leave as part of North Bethesda Policy Area and therefore it remains in the Turnover Impact Area.
 2. Move to the White Flint Policy Area and therefore it changes to the Infill Impact Area.
 3. Consider a broader policy decision to designate all Red Policy Areas as Infill Impact Areas.



Chapter 4. Schools Element Recommendations

Annual School Test and Utilization Report



Annual School Test and Utilization Report Recommendations

- 4.2 By January 1, 2021, the Planning Board must adopt a set of Annual School Test Guidelines, which outline the methodologies used to conduct the Annual School Test and to evaluate the enrollment impacts of development applications and master plans.
- 4.3 The Annual School Test will be conducted at the individual school level only, for each and every elementary, middle and high school, for the purposes of determining school utilization adequacy.
- 4.4 The Annual School Test will evaluate projected school utilization three years in the future using the following school utilization adequacy standards:
- ES: Seat Deficit < 100 seats or Percent Utilization ≤ 120%
 - MS: Seat Deficit < 180 seats or Percent Utilization ≤ 120%
 - HS: Percent Utilization ≤ 120%





Annual School Test and Utilization Report Recommendations

- 4.5 The Annual School Test will establish each school service area's adequacy status for the entirety of the applicable fiscal year.
- 4.6 The Annual School Test will include a Utilization Report that will provide a countywide analysis of utilization at each school level.
- 4.7 The Utilization Report will also provide additional utilization and facility condition information for each school, as available.

Annual School Test and Utilization Report

R4.2

By January 1, 2021, the Planning Board must adopt a set of Annual School Test Guidelines, which outline the methodologies used to conduct the Annual School Test and to evaluate the enrollment impacts of development applications and master plans.

- This is all about transparency.
- The guidelines will explain how the test is conducted, including the calculation of any modifications to the planned capacities or projected enrollments published by MCPS resulting from placeholder projects or approved CIP projects at other schools.



Annual School Test and Utilization Report

R4.2 Comment Summary

- Some people have questioned whether these procedures should be subject to Council approval and not determined solely by the Planning Board.
- ULI supported this recommendation and attempts to simplify the school test in general. They indicated that “The existing Annual School Test is perceived as a complicated process, with timing aspects that can be confusing to the public as well as the development community.”



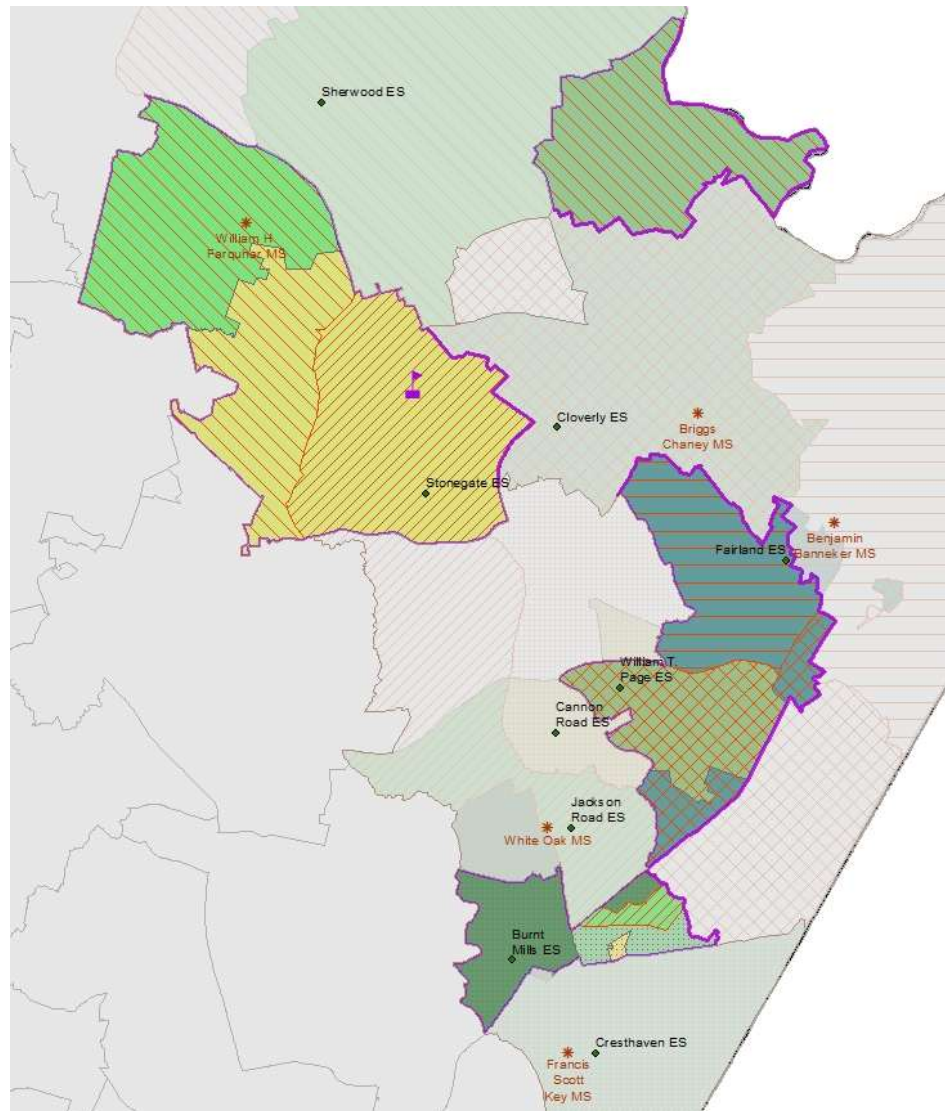
Annual School Test and Utilization Report



















R4.3

The Annual School Test will be conducted at the individual school level only, for each and every elementary, middle and high school, for the purposes of determining school utilization adequacy.

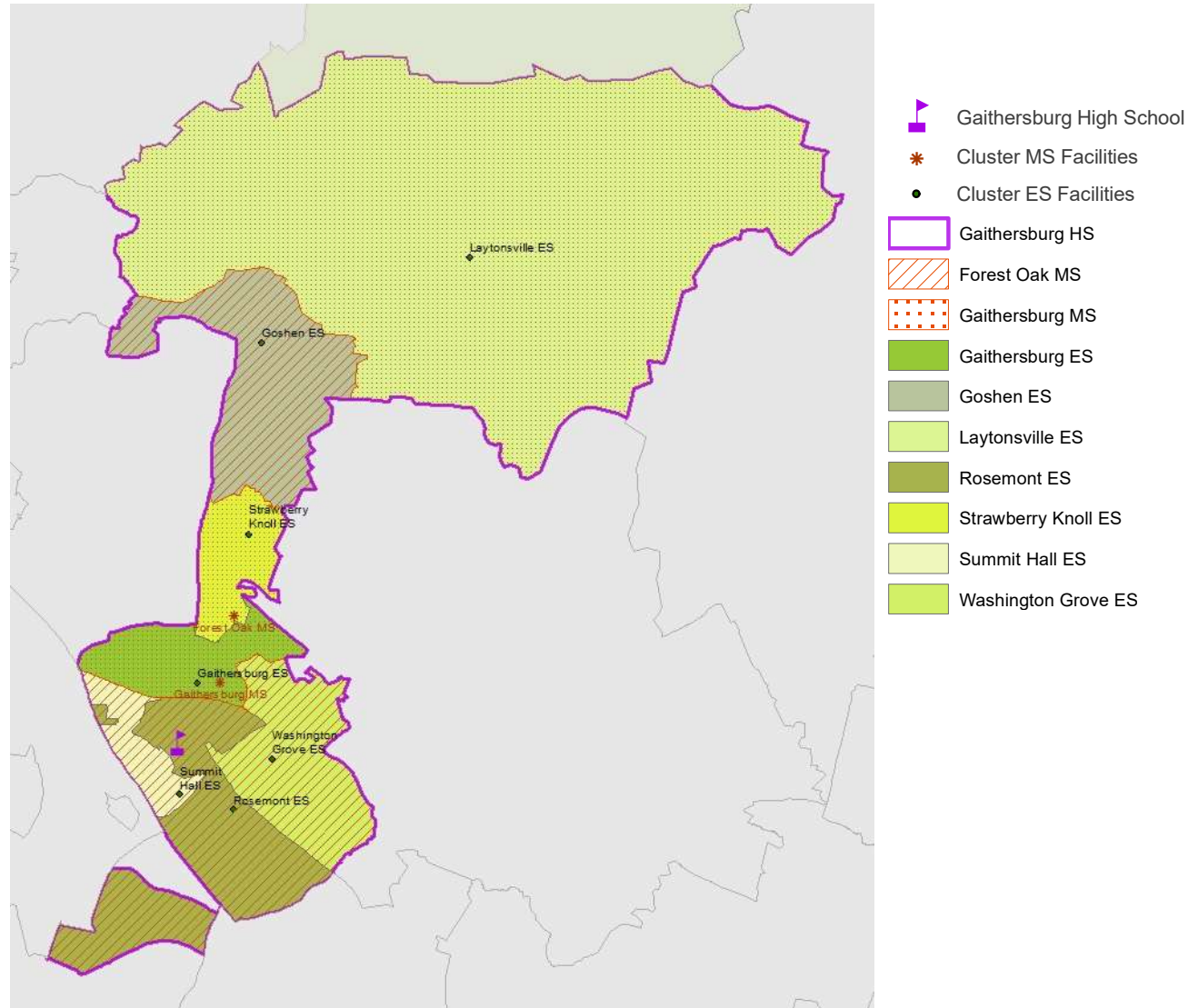
- The cluster test is a holdover from a foregone approach to the policy. This is more in line with how other jurisdictions conduct their adequate public facilities review.
- There will no longer be a cluster-level test, which masks both overcrowded and adequate school facilities.
- Eliminates confusing and complicated cluster calculations when there are split articulations.
- This simplifies the identification of areas requiring Utilization Premium Payments or Planning Board review of school adequacy.





-  Blake High School
-  Cluster MS Facilities
-  Cluster ES Facilities
-  Blake HS
-  Banneker MS
-  Briggs Chaney MS
-  Farquhar MS
-  Key MS
-  White Oak MS
-  Burnt Mills ES
-  Cannon Road ES
-  Cloverly ES
-  Fairland ES
-  Jackson Road ES
-  Page ES
-  Roscoe R. Nix/Cresthaven ES
-  Sherwood ES
-  Stonegate ES

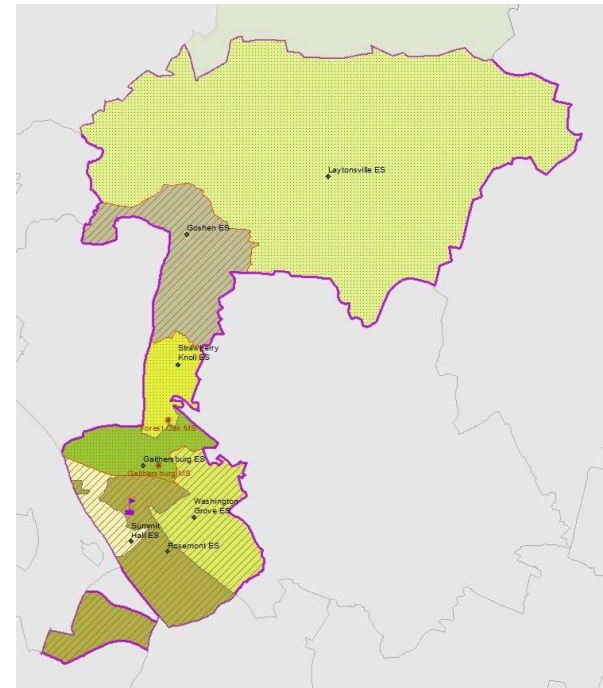
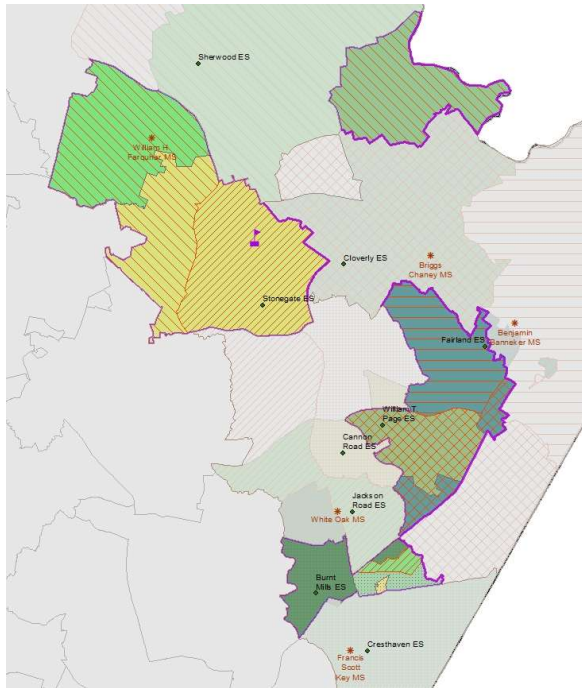




Annual School Test and Utilization Report

R4.3 Comment Summary

- Some concern expressed that badly over-utilized clusters might be overlooked without a cluster test for elementary and middle schools.



Annual School Test and Utilization Report

R4.4

The Annual School Test will evaluate projected school utilization three years in the future using the following school utilization adequacy standards:

ES: Seat Deficit < 100 seats or Percent Utilization \leq 120%

MS: Seat Deficit < 180 seats or Percent Utilization \leq 120%

HS: Percent Utilization \leq 120%

1. Changes the test time frame from 5 to 3 years.
 - Many factors determine how long it will take an approved project to start adding students to the public schools.
 - Projects programmed in the out years of the budget are frequently delayed.
 - The 5-year projections are the least reliably accurate.
2. Maintains current adequacy standards.



Annual School Test and Utilization Report

R4.4

From the time an application receives its adequate public facilities approval, how long does it take a project to start generating students?

- Of the data we have, for 56 projects approved between 2010 and 2015 (total of more than 15,000 approved units), for which we have at least one final inspection date:

0 to 3 years from APF approval to first final inspection	73%
4 to 5 years from APF approval to first final inspection	18%
6 or more years from APF approval to first final inspection	9%



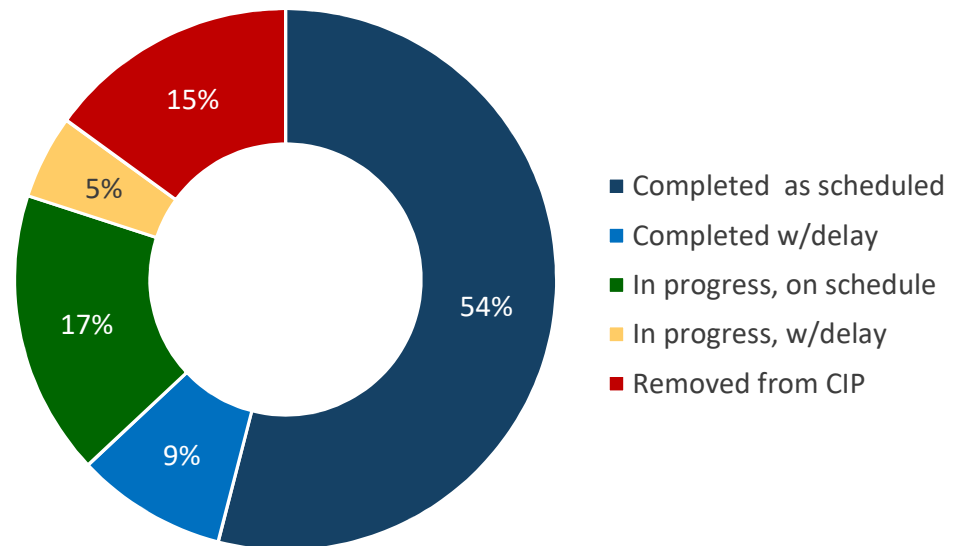
Annual School Test and Utilization Report

R4.4

Projects programmed in the out years of the budget are frequently delayed or removed from the CIP altogether.

- Over the last ten years, approximately 15% of capacity projects, all of which were originally scheduled in the out years, have been removed from the CIP.
- An equal number of projects were delayed by at least one year.

CIP Capacity Projects
By Timeliness of Completion



Annual School Test and Utilization Report

R4.4

The 5-year projections are the least reliably accurate.

- The further out you go, the greater the margin of error because there are more unpredictable factors that influence enrollment that come into play.
- There is less speculation in the shorter term – on both the impact of new (and potentially phased development) and even on the kindergarten enrollment.
- In general we are trying to place less of an emphasis on a specific number, in part because the numbers are not a guarantee – they're estimates that we know are imperfect.



Annual School Test and Utilization Report

R4.4 Comment Summary

Support

- Three-year timeframe will greatly improve public confidence in the forecast and the school test.
- The five-year forecasts are “notoriously bad.”
- The shorter forecasts involve less speculation on MCPS’s part regarding the likelihood or expected completion of a residential development.
- Programmed capacity projects in the shorter term are relatively reliable. Whereas assuming projects in the out years will actually be funding is “wishful thinking.”
- ULI: Five-years is a relatively long time horizon that results in greater uncertainty because the accuracy of the projection may decline significantly in the out-years. Shortening the projection horizon to three years can add predictability for the development community.

Opposed

- Five-year timeframe more reliably reflects when students from new development will actually enroll.
- Five-year window is more consistent with the county’s CIP process.



Annual School Test and Utilization Report

Consistency with the CIP?

- The recently adopted CIP is for FY21 through FY26.
- The CIP is only adopted every two years, but amended on the off years.
- So next year, we will still be functioning under the FY21-26 CIP, though which will technically only include funding for projects through FY26 still.projects i

FY21	FY22	FY23	FY24	FY25	FY26	FY27	FY28	FY29
FY21 School Test			3-year test projections		5-year test projections			
	FY22 School Test			3-year test projections		5-year test projections		
		FY23 School Test			3-year test projections		5-year test projections	
			FY24 School Test			3-year test projections		5-year test projections



Annual School Test and Utilization Report

R4.4

The Annual School Test will evaluate projected school utilization three years in the future using the following school utilization adequacy standards:

ES: Seat Deficit < 100 seats or Percent Utilization \leq 120%

MS: Seat Deficit < 180 seats or Percent Utilization \leq 120%

HS: Percent Utilization \leq 120%

1. Changes the test time frame from 5 to 3 years.
 - Many factors determine how long it will take an approved project to start adding students to the public schools.
 - Projects programmed in the out years of the budget are frequently delayed.
 - The 5-year projections are the least reliably accurate.
2. Maintains current adequacy standards.



Annual School Test and Utilization Report

R4.4

- The adequacy standards are unchanged from the current SSP, to identify areas for residential development moratoria (in Greenfield Impact Areas) and areas requiring detail Planning Board review and Utilization Premium Payments (in Turnover and Infill Impact Areas).

School Level	Projected Utilization Adequacy Standards	Greenfield Impact Areas	Turnover and Infill Impact Areas
Elementary	Seat Deficit \geq 110 seats and Utilization $>$ 120%	Moratorium	Board Review and Utilization Premium Payments
Middle	Seat Deficit \geq 180 seats and Utilization $>$ 120%		
High	Utilization $>$ 120%		



PROPOSED County Growth Policy FY 2021 Annual School Test Summary
Reflects the Adopted FY 2021 Capital Budget and FY 2021-2026 Capital Improvements Program
 Conducted May 15, 2020

	Elementary School	Middle School	High School
Applicable Adequacy Standard	Seat Deficit < 110 seats or Percent Utilization ≤ 120% in 2023-2024	Seat Deficit < 180 seats or Percent Utilization ≤ 120% in 2023-24	Percent Utilization ≤ 120% in 2023-24
<u>AUTOMATIC MORATORIUM</u> Residential development moratorium required in inadequate school service areas within Greenfield Impact Areas.			Clarksburg HS
<u>PLANNING BOARD REVIEW and UTILIZATION PREMIUM PAYMENTS</u> Planning Board review required to evaluate school service area adequacy and Utilization Premium Payments required within Turnover and Infill Impact Areas.	Ashburton ES Bannockburn ES Bethesda ES Burning Tree ES Burtonsville ES Diamond ES Greencastle ES	Highland View ES Mill Creek Towne ES William T. Page ES Judith A. Resnik ES South Lake ES Watkins Mill ES	Argyle MS Montgomery Blair HS Winston Churchill HS Clarksburg HS Albert Einstein HS Walter Johnson HS Quince Orchard HS

FY2021 ANNUAL SCHOOL TEST NOTES

The test outcome for any school service area not identified on the results summary table is adequate.



PROPOSED County Growth Policy FY 2021 Annual School Test

Reflects the Adopted FY 2021 Capital Budget and FY 2021-2026 Capital Improvements Program

Elementary School Adequacy Standard: Seat Deficit < 110 seats or Percent Utilization ≤ 120%

Elementary School Area	School Test Projections for 2023-24				Status		
	Enrollment	Program Capacity	Seat Deficit/ Surplus	Utilization	Greenfield Impact Area	Turnover Impact Area	Infill Impact Area
Arcola	748	651	-97	114.9%	N/A	Adequate	Adequate
Ashburton	967	789	-178	122.6%	N/A	BR/UPP Req.	BR/UPP Req.
Bannockburn	500	364	-136	137.4%	N/A	BR/UPP Req.	N/A
Lucy V. Barnsley	749	652	-97	114.9%	N/A	Adequate	N/A
Beall	542	639	+97	84.8%	N/A	Adequate	Adequate
Bel Pre ⁱ	1,061	1,079	+18	98.3%	N/A	Adequate	N/A
Bells Mill	650	626	-24	103.8%	N/A	Adequate	N/A
Belmont	365	425	+60	85.9%	N/A	Adequate	N/A
Bethesda	735	560	-175	131.3%	N/A	BR/UPP Req.	BR/UPP Req.
Beverly Farms	602	689	+87	87.4%	N/A	Adequate	N/A
Bradley Hills	531	663	+132	80.1%	N/A	Adequate	N/A
Brooke Grove	481	518	+37	92.9%	N/A	Adequate	N/A
Brookhaven	466	470	+4	99.1%	N/A	Adequate	N/A
Brown Station	742	761	+19	97.5%	N/A	Adequate	N/A
Burning Tree	490	378	-112	129.6%	N/A	BR/UPP Req.	N/A
Burnt Mills	575	740	+165	77.7%	N/A	Adequate	N/A
Burtonsville	636	493	-143	129.0%	N/A	BR/UPP Req.	N/A
Candlewood	397	515	+118	77.1%	N/A	Adequate	Adequate
Cannon Road	420	518	+98	81.1%	N/A	Adequate	N/A
Carderock Springs	375	406	+31	92.4%	N/A	Adequate	N/A
Rachel Carson ¹	570	692	+122	82.4%	N/A	Adequate	Adequate
Cashell	335	339	+4	98.8%	N/A	Adequate	N/A
Cedar Grove ²	341	402	+61	84.8%	Adequate	Adequate	N/A
Chevy Chase ⁱⁱ	1,199	1,459	+260	82.2%	N/A	Adequate	Adequate
Clarksburg ²	264	311	+47	84.9%	Adequate	Adequate	Adequate
Clearspring	634	642	+8	98.8%	N/A	Adequate	N/A
Clopper Mill	572	496	-76	115.3%	N/A	Adequate	Adequate
Cloverly	517	461	-56	112.1%	N/A	Adequate	N/A

BR/UPP Req. = Board Review and Utilization Premium Payments required.



Annual School Test and Utilization Report

R4.4 Comment Summary

- Some people are concerned about completely eliminating moratoria in 93% of the county and have asked the Planning Board to consider setting a super-threshold standard that provides moratoria in the infill and turnover areas.
- Some have noted that the most reliable utilization data are the current year actual and have suggested that we used those to determine a school's status.
- Another suggestion was to consider increasing the utilization standard to 125% in light of the shorter 3-year timeframe.



Annual School Test and Utilization Report

R4.5

The Annual School Test will establish each school service area's adequacy status for the entirety of the applicable fiscal year.

- There will be no staging ceiling or threshold against which a development application's enrollment impact is measured.
- The staging ceiling creates and places the fate of development applications on a false sense of precision.
- A school service area's status will not be changed during a fiscal year to reflect the impacts of prior approvals in the development pipeline.



Annual School Test and Utilization Report

School Status* Identified in the Annual School Test	Application Implication
Open	The school's capacity is deemed adequate for new residential development in that given School Impact Area, meaning that an application can be approved.
In Moratorium	The school's capacity is deemed inadequate for new development in Greenfield Impact Areas, meaning that an application <u>cannot</u> be approved unless it meets the requirements of a moratorium exception.
Planning Board Review and Utilization Premium Payments Required	The school's capacity adequacy requires detailed review by the Planning Board. Per Recommendation 4.12, the Planning Board will be provided with information pertaining to the subject school facility, nearby schools at the same school level (elementary, middle or high) and the estimated enrollment impacts of the proposed development. The Planning Board would then make the school facility adequacy determination. The development is also subject to a Utilization Premium Payment (discussed in Recommendation 4.16).

* Note that a school's status can vary by School Impact Area. In other words, a school service area that includes both Greenfield and Turnover Impact Areas can be in moratorium in the Greenfield Impact Area portion and require Planning Board review and Utilization Premium Payments in the Turnover Impact Area.



Annual School Test and Utilization Report

R4.5 Comment Summary

- MCCPTA “adamantly opposes” this recommendation believing that the original intent of the staging ceiling was to measure the cumulative impact of approved development against available capacity.
- This will abandon efforts to track the cumulative impact of approved development. Cumulative impact should be tracked for purposes of funding the entirety of the capacity that will be needed.
- The recommendation proposes a red-light/green-light approach for all development in a given year, without regard for remaining capacity, eliminating the Planning Board’s responsibility to meet APFO requirements.



Annual School Test and Utilization Report

R4.6

The Annual School Test will include a Utilization Report that will provide a *countywide* analysis of utilization at each school level.

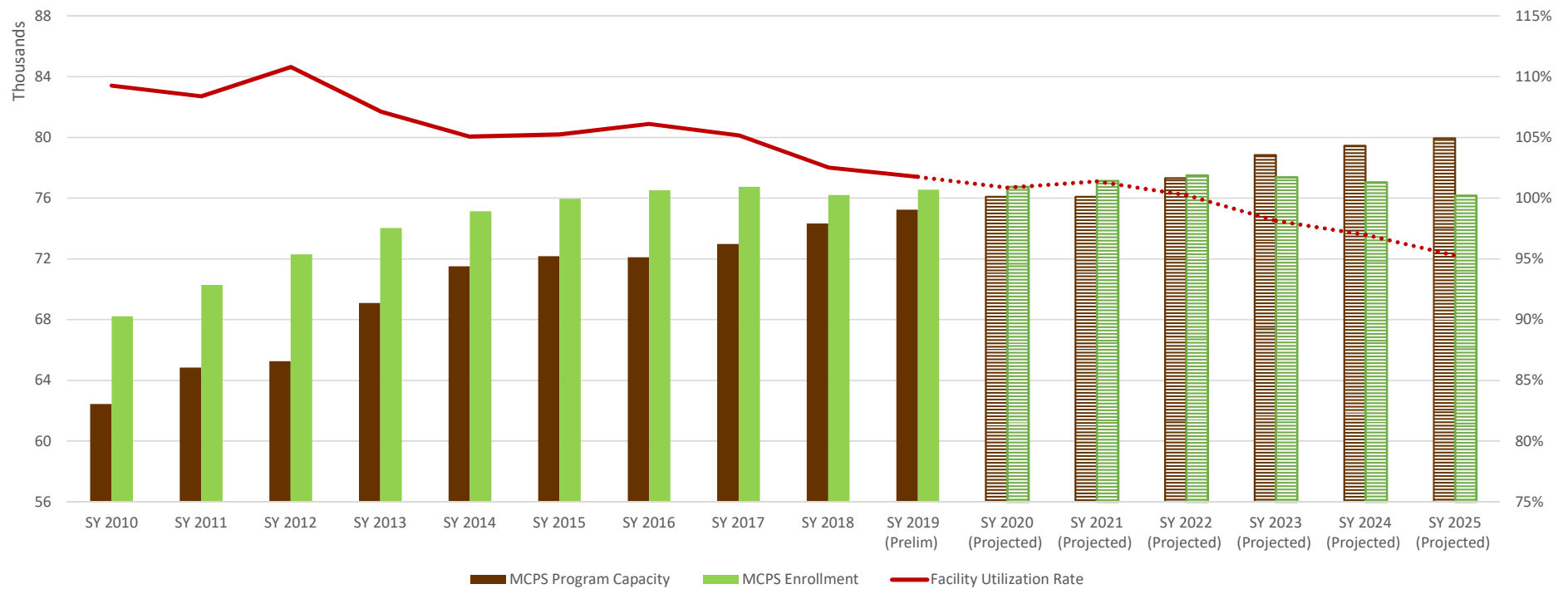
- This would provide a countywide context for an individual school's condition.
- The data reported should include historical and projected:
 - countywide utilization rates by level
 - share and number of schools at each level that fall into the following utilization categories: Up to 80%; 80-100%; 100-120%; Over 120%



Annual School Test and Utilization Report

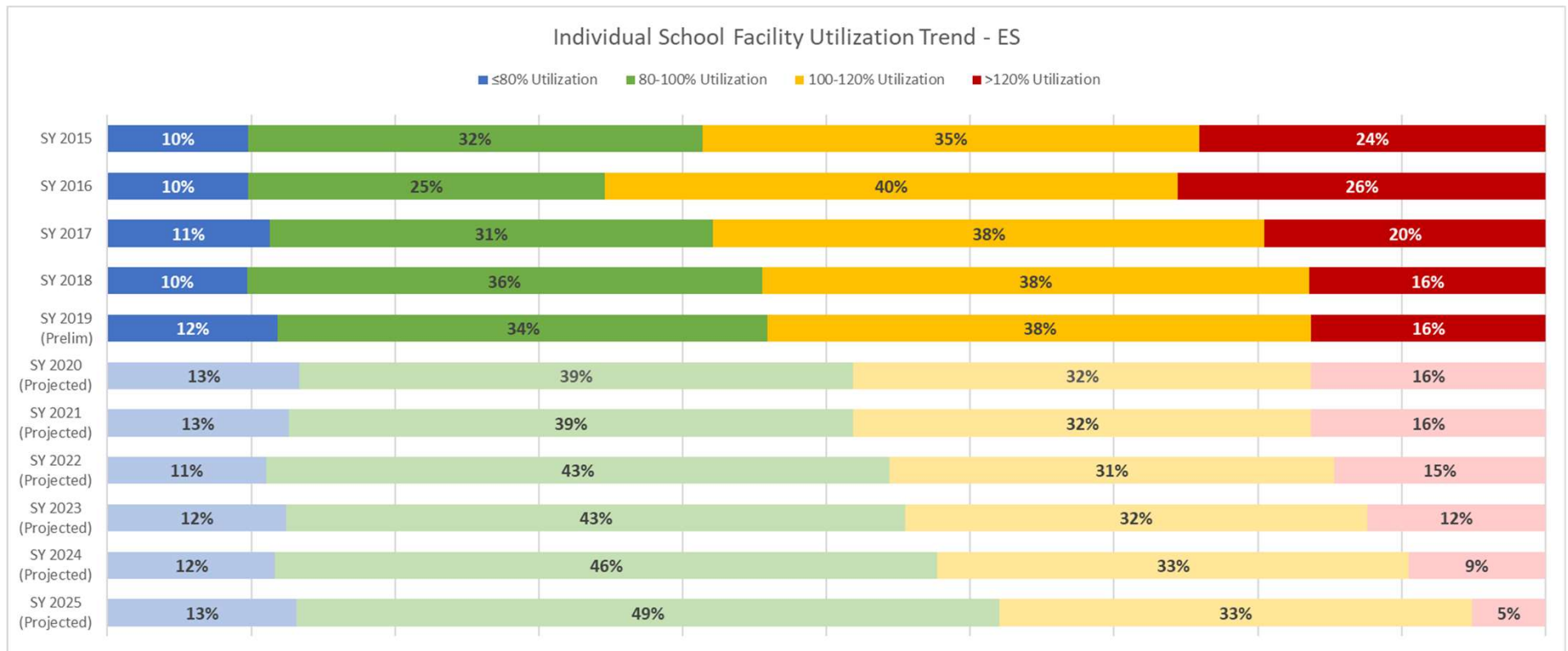
Examples of Countywide Utilization Reporting

Countywide School Facilities Utilization Trend - ES



Annual School Test and Utilization Report

Examples of Countywide Utilization Reporting



Annual School Test and Utilization Report

R4.7

The Utilization Report will also provide additional utilization and facility condition information for each school, as available.

- Will include data related to the facility conditions and infrastructure adequacy for each individual school:
 - historical and projected enrollment, program capacity, core capacity and utilization
 - the current number of relocatable (portable) classrooms at the school
 - the most current MCPS Key Facility Indicator data and
 - a list of the three nearest schools at the same school level along with the distance to the schools
- Could help facilitate discussions between developers and MCPS about potential ways the developers can make improvements to school facility conditions (roof replacements, HVAC system upgrades, etc.).



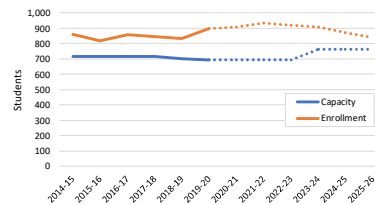
Annual School Test and Utilization Report

Example of Individual School Facility Reporting

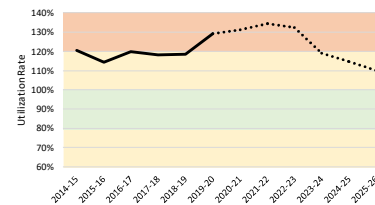
South Lake ES
(Watkins Mill Cluster)

	Historical Actuals					Current	Projected						
	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	
Capacity	716	716	716	716	701	694	694	694	694	763	763	763	
Enrollment	862	818	858	845	831	897	910	934	918	909	874	839	
Space	-146	-102	-142	-129	-130	-203	-216	-240	-224	-146	-111	-76	
Utilization	120.4%	114.2%	119.8%	118.0%	118.5%	129.3%	131.1%	134.6%	132.3%	119.1%	114.5%	110.0%	

Historical and Projected Capacity and Enrollment



Historical and Projected Utilization Rate



2019-20 Facility Characteristics

Year Facility Opened	1972
Year Revitalized	N/A
Total Square Footage	83,038
Site Size (acres)	10.2
Adjacent Park	No
Relocatable Classrooms	10

Distance to Nearest Elementary Schools

Gaithersburg ES	Gaithersburg Cluster	1.2 miles
Strawberry Knoll ES	Gaithersburg Cluster	1.7 miles
Watkins Mill ES	Watkins Mill Cluster	1.9 miles

2018 MCPS Key Facility Indicator Data

Overall	Foundations	Basement	Superstructure	Exterior Enclosure	Roofing	Interior Construction	Stairs	Interior Finishes	Conveying Systems	Plumbing	HVAC	Fire Protection	Electrical	Equipment	Furnishings	Special Construction	Classroom Shape	IMC Size	Cafeteria Size	Corridor	Temperature Control	Humidity Control	Natural Light	Acoustic Features	Building-Level Power Delivery
Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Data Source: Montgomery County Public Schools



Chapter 4. Schools Element Recommendations

Residential Development Moratorium





Residential Development Moratorium Recommendations

- 4.8 Automatic moratoria will only apply in Greenfield Impact Areas. The Planning Board cannot approve any preliminary plan of subdivision for residential uses in an area under a moratorium, unless it meets certain exceptions.
- 4.9 Exceptions to residential development moratoria will include projects estimated to generate fewer than one full student at a school in moratorium, and projects where the residential component consists entirely of senior living units.
- 4.10 Eliminate the moratorium exception adopted in 2019 pertaining to projects providing high quantities of deeply affordable housing or projects removing condemned buildings.

Residential Development Moratorium

R4.8

Automatic moratoria will only apply in Greenfield Impact Areas. The Planning Board cannot approve any preliminary plan of subdivision for residential uses in an area under a moratorium, unless it meets certain exceptions.

- The current moratorium policy:
 - Slows the county's ability to fill its housing supply gap
 - Impacts housing affordability
 - Hinders economic development
 - Prevents sustainable growth patterns
 - Raises equity concerns
 - Does not solve over-crowding



Residential Development Moratorium

R4.8 Comment Summary

Support

- Older neighborhoods turning over causes school enrollments to surge in many areas and turnover has nothing to do with new development.
- We need development to give us the tax base to afford to build new schools and other things.
- The very idea of a moratorium is contrary to comprehensive planning, zoning, and budgeting—i.e., to responsible government.
- Automatic housing moratorium encourages disproportionate investment in schools under moratorium, typically in wealthier neighborhoods, while overlooking other schools with inadequate and substandard facilities, typically in lower income communities.
- Studies in other areas found moratoriums to accelerate, or frontload, development as threshold numbers are approached.
- Just because we can't forbid families moving into existing older homes doesn't mean we should take it out on apartment development.
- ULI supported this recommendation, believing it is prudent to limit automatic moratoriums to only Greenfield Impact Areas unless a project meets certain identified exceptions.



Residential Development Moratorium

R4.8 Comment Summary

Oppose

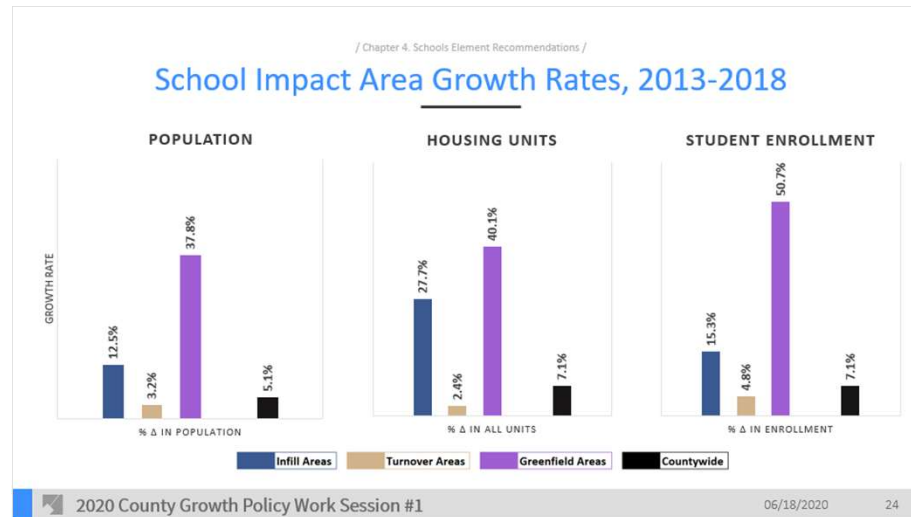
- It's outrageous that the recommendation to eliminate automatic moratoria in most of the county was not accompanied by any new mechanisms to ensure adequate school infrastructure.
- Our schools are severely overcrowded. Until new schools are built and the overcrowding is addressed, more housing should not be added in clusters that are already stretched to the limit.
- When our schools are already struggling to meet demand, any increase hampers the school system.
- An attempt to end the moratorium is a prioritization of financial interests for the real estate sector, builders, agents, etc.
- A moratorium is a bad policy outcome, but the law itself is not bad policy. The problem is that planners have no interest in making sure that facilities come online to meet anticipated demand.
- Consider an emergency moratorium threshold for extreme situations. Options include:
 - 150% utilization (maybe even limit to only one year)
 - 120% actual (not projected) utilization for three years in a row
- Keeping moratorium in Greenfield Impact Areas is unfair. That area is import for meeting the county's housing goals.



Residential Development Moratorium

R4.8

- Greenfield Impact Areas are still experiencing the type of development that originally led to the creation of the Adequate Public Facilities Ordinance, where the **construction of new schools cannot keep pace with rapidly increasing enrollment** caused by new development.



Residential Development Moratorium

R4.8

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