

# Citizens Coordinating Committee on Friendship Heights

June 1, 2016

Chairman Casey Anderson and Members of the Board  
Montgomery County Planning Board  
8787 Georgia Ave.  
Silver Spring, Maryland 20910

Re: Subdivision Staging Policy: School component

Dear Chair Anderson, Vice Chair Wells-Harley, and Commissioners Dreyfuss, Fani-Gonzalez, and Presley:

The Citizens Coordinating Committee on Friendship Heights (CCCFH) submits these comments on the Public Hearing Draft of the 2016 Subdivision Staging Policy dated May 19, 2016. We appreciate the opportunity to comment.

In general, we oppose the Subdivision Staging Policy (SSP) approach to the issue of new facility construction for the County schools in conjunction with the construction of new housing. Our concerns are as follows:

Student Generation Rate: the most recent 10 year period utilized for the database for projecting the student generation rate is unacceptable. The timeframe is far too short, with the “great recession” having far too great an effect on the database. The student generation rates for multifamily housing are so low in comparison to student generation rates previously used that the results are highly suspect. The existing student generation rates must be kept.

School Facility Payments & School Impact Taxes: the net effect of the proposed student generation rates is a significant reduction in the School Facility Payments and School Impact Taxes paid in conjunction with construction of multifamily housing. Simultaneously a significant general tax increase has been enacted within the county which was partially justified by the needs of the school system, including construction. This makes no sense.

Moratorium: currently the Cluster Utilization Test triggers a moratorium across the entire cluster’s service area if any one level (elementary, middle, high) of school reaches 120% utilization projected in the sixth year of the Capital Improvement Program. The threshold of 120% is far too high. Any school operating at that level will have become thoroughly dysfunctional. That threshold must be reduced to at 110%.

We find the following SSP recommendations to be commendable:

Hybrid Annual School Test: the SSP states... *“The current cluster level tests conducted through the SSP mask the problems that exist at individual schools. This situation is particularly true at the elementary school level where a cluster could have an individual school that is grossly over enrolled, but five or six other elementary schools with adequate capacity.”* As a result the SSP recommends: *“The implementation of a hybrid annual school test combines cluster utilization tests with individual school capacity deficit tests.”*

Representing the Citizens Associations of Brookdale, Chevy Chase Village, Chevy Chase West, Drummond, Green Acres-Glen Cove, Kenwood, Kenwood Condominium, Kenwood House Cooperative, Kenwood Place Condominium, Somerset, Springfield, Sumner, Sumner Square Condominium, Sumner Village Condominium, Westmoreland, Westbard Mews, Westwood Mews, and Wood Acres

Placeholder Projects: from the SSP... “... concern is that the placeholder project undermines the intent of the Subdivision Staging Policy, which is to ensure that adequate public facilities exist prior to approving new development.” As a result the SSP recommends:” placeholder capacity for a particular cluster level or school can only be counted as capacity in the annual school test for two years.”

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Again, we are most appreciative of the opportunity to bring our concerns to your attention.

Sincerely,

Harold Pfohl  
Corresponding Secretary  
Citizens Coordinating Council on Friendship Heights