



Cecily Baskir, *Mayor*
Joel Rubin, *Vice Mayor*
Barney Rush, *Treasurer*
Ellen Cornelius Ericson, *Secretary*
Irene N. Lane, *Community Liaison*

June 10, 2020

Mr. Casey Anderson, Chair,
and Members of the County Planning Board
Montgomery County Planning Board
8787 Georgia Avenue
Silver Spring, MD 20910

RE: 2020-2024 County Growth Policy Public Hearing Draft

Dear Chairman Anderson & Members of the Planning Board:

We write to share with you the Town of Chevy Chase's comments on the Public Hearing Draft of the 2020-2024 Subdivision Staging Policy, now known as the County Growth Policy.

Infrastructure that supports growth relies on periodic improvements and requires careful study to assess its adequacy to support new development. The Public Hearing Draft proposes significant changes to the tools used to assess the adequacy of that infrastructure and to fund it. Whatever methodology the Planning Board ultimately recommends in the County Growth Policy, it must be robust enough to exert pressure on the County and other key participants to make the necessary investments.

I. School Impact and Recordation Taxes

As an initial matter, we request information about how the proposed changes will affect revenues collected. How will the revenues under the new systems compare to what currently exists, and what is the anticipated net effect on funding for projected infrastructure needs? A comprehensive evaluation of the financial impact of the changes to school impact taxes and recordation taxes is necessary and should be made publicly available prior to further consideration of those changes.

II. Residential Development Moratoria

We want to ensure that school capacity is adequate. The automatic residential development moratoria have been the mechanism used to advance school infrastructure improvements and correct overcrowding. The County Growth Policy proposes to terminate the automatic moratoria, with a few exceptions. We recognize that there have been problems with how

moratoria worked in some circumstances, but if they are to be eliminated, they must be replaced with effective mechanisms to ensure adequate school infrastructure. If the Planning Board recommends terminating the moratoria, then it needs to propose a new and effective tool upon which Montgomery County can rely when school infrastructure is stressed beyond its limits.

It is not clear how the proposed replacement (Planning Board review and the utilization premium payment) will ensure that school overcrowding is rectified in a timely manner. This proposed policy would allow the Planning Board to approve new residential development even when schools are severely overcrowded, without a plan in place to address that overcrowding.

In addition, the proposal to cease monitoring the ongoing impacts of new residential development on schools during a fiscal year may exacerbate the problem. We are skeptical that a blanket “red light” or “green light” policy for all development for a year complies with the mandate of Chapter 50’s Adequate Public Facilities Ordinance.

III. Transportation: Traffic Still Matters

With respect to transportation, the County Growth Policy should continue to monitor and gauge traffic in all policy areas. Traffic impacts everyone, and we believe that motor vehicle traffic assessment still matters. Traffic congestion in highly urbanized areas, such as the "red" policy areas, can impose significant externalities on surrounding communities in the form of increased cut-through traffic, less safe conditions for pedestrians and cyclists (particularly in areas undergoing heavy construction such as the Wisconsin Avenue corridor), and increased mass transit time for area residents and workers who use bus mass transit.

In addition to assessing vehicular traffic, we support evaluating transportation adequacy from a multi-modal standpoint through the addition of the System Safety Adequacy, Pedestrian Safety Adequacy, Bicycle System Adequacy, and Transit System Adequacy tests to the Local Area Transportation Review (LATR). Pedestrian and bicyclist safety are important to us. We support Vision Zero, and we support incorporating its goals into the transportation adequacy analysis. In fact, that is part of why we strongly support funding in the Capital Improvements Program budget for the Capital Crescent Trail Tunnel under Wisconsin Avenue.

As we consider the impact of development over the next four years, we appreciate the opportunity to share our comments in advance of the Planning Board’s June 11, 2020 hearing on the Public Hearing Draft of the 2020-2024 Subdivision Staging Policy.

Sincerely,

A handwritten signature in black ink, appearing to read "Cecily S. Baskir", followed by a long horizontal line extending to the right.

Cecily Baskir
Mayor