

October 20, 2009
4714 Argyle Ave.
Garrett Park, MD

The Honorable Phil M. Andrews, President
Montgomery County Council
100 Maryland Avenue
Rockville, MD 20850

Dear Council President Andrews:

I represent the Parent and Resident Committee for Sustainability. PARCS is a group of parents and residents in the White Flint area that supports high-quality, uncrowded schools in the Walter Johnson school cluster, and preservation of the cluster.

I also speak on behalf of the White Flint Community Coalition. The Coalition is comprised of eight communities in and around White Flint, including more than 3,200 households and 8,500 residents:

- Crest of Wickford Condominium Association
- Garrett Park Citizens Association
- Garrett Park Estates-White Flint Park Citizens' Association
- Luxmanor Civic Association
- Parkwood Residents Association
- Sterling HOA
- Timberlawn Homeowners Association
- Wickford Community Association.

The Coalition supports:

1. One central core of appropriately dense, mixed-use development focused around Metro.
2. Surrounding development clusters that are secondary to and compatible with existing neighborhoods.
3. Walkable and cyclable destinations.
4. A public green and green spaces throughout.
5. Sustainable development consistent with 21st Century climate goals.
6. High-quality, uncrowded schools in the Walter Johnson cluster.
7. A clear transportation plan, commenced contemporaneously with commercial and residential development.

Sincerely,

Liz King,
PARCS, White Flint Community Coalition

**STATEMENT OF THE PARENT AND RESIDENT COMMITTEE FOR SUSTAINABILITY
STATEMENT OF THE WHITE FLINT COMMUNITY COALITION**

The WF sector plan recommends measures that would seriously strain the capacity and compromise the quality of wonderful schools in the WJ cluster. By contrast, we promote excellent, uncrowded schools in the cluster. We suggest a few straightforward changes to retain world-class schools.

I. The County Has a Responsibility to Provide for Adequate Schools in a Sector Plan:

Our County has an Adequate Public Facilities Ordinance. This says that public facilities, including schools, must be adequate to “support and service the area of the proposed subdivision” before the related plan can be approved.¹ This is a legal requirement.

Should the County meet the school requirement just by collecting impact taxes for schools? Not for a development that will need a new school, and land for that school. Impact taxes cannot be used to buy a school lot. Land is obviously scarce, and may become prohibitively expensive if the County collects funds gradually without reserving property now. MCPS has determined that the White Flint (WF) sector plan will require an entire new ES. Thus, a responsible plan for the WF sector will require not just payment of construction costs (see part VII) but also dedication of land for that school.

All elementary schools built in Montgomery County in the past 10 years have been built using dedicated land. It is hardly unreasonable to ask the developers who will generate the student populations involved to (1) pay for the facility expansions involved, and (2) provide for the land.

II. Without a School Site, the Plan Will Seriously Overcrowd WJ Elementary Schools.

For the Walter Johnson (WJ) cluster, which contains “the area of the proposed subdivision”, the WF plan does not meet the responsibility to provide for adequate schools.

This plan will generate over 400 elementary school students in the cluster.² The development will generate an entire school's worth of ES students, and greatly expand 2 other schools until that ES is built.

Under an aggressive Growth Policy, the elementary schools in the WJ cluster could reach major overcrowding (300 students over capacity) in 10-15 years. In fact, this overcrowding could come even sooner, given the likely impact of the White Flint Phase II Plan, now being assembled by the Planning Department. This will swamp the schools attended by our youngest students.

We need to balance residential density with public schools. Yet the proposed plan does not reserve land for a school in the WF sector.

III. Rather than Providing for a School Site, the **Plan Promotes Redistricting:**

Instead, the plan suggests that the increased student population should be served either by (1) general redistricting or (2) reopening Rocking Horse ES to serve students in the WJ cluster.

Both solutions are objectionable. They would either add 160 students to an overcrowded WJHS, or redistrict some WJ cluster students. They would disrupt communities that are built around schools in the WJ cluster, and allow developers to build enormous projects without adequate contributions for schools.

Neither of these solutions should be necessary. The additional student population should be served in a school on land that is provided by developers and located in the sector, or (as a distinct second choice) the cluster.

IV. The Plan Must **Provide Land for a School Within the Sector or Cluster:**

We urge the Council to insist on a plan with dedicated land – suitable for an ES – in the WF sector. Or, the Council could acquire the land and require developers to reimburse the county. The Board of Education, and the WJ cluster PTAs, have supported preservation of land in the sector. Some of the developers have noted the desirability of a school within the sector, too.

This is certainly the best option. We urge the Council to support this idea, by (1) voting for a site in the sector or (2) requiring developers to sit down with MCPS and planners, and locate a suitable site for this use.

What's a suitable site? Recent designs by MCPS indicate that a 5-6 acre site would be fully sufficient to meet the needs of an ES. Any site must comply with fire and other safety requirements, while providing the sort of outdoor environment that young children need to maximize their concentration and abilities. The school site should be appropriate for the more urban development being proposed, within walking distance for many students, and accessible for parents who want to volunteer during school hours.

While this is a distinct second choice, a former school site within the WJ cluster could also be used to serve the students generated by the plan - as long as developers dedicate land to the county in return. Reopening a school requires transferring the programs, or MCPS clients, at that location, and there are costs involved - for the transfer, and for new construction at the school site. For either a school in the sector or the cluster, developers should provide property, or funds for property bought by MCPS.

PARCS does not favor or oppose a White Flint Mall/Plaza site³, but we know that more than 1 suitable site exists in the WJ cluster. In fact, we hope that MCPS will review alternative sites, and be prepared to propose satisfactory alternatives to you if needed. We suggest examining suitable sites that were not considered by the Planning Board or not proposed because the sites require an acquisition, or sites that could receive programs or MCPS clients if the county elected to reopen former schools in the cluster.

V. The Plan Will Seriously Overcrowd Walter Johnson HS:

The WF plan will generate hundreds of students for middle and for high schools in the cluster.⁴ This will greatly enlarge Tilden MS, which has the ability to absorb the projected student population not because it has sufficient capacity but rather because there is sufficient space for an addition.

Stages 1-3 of the proposed WF and other known developments will exceed WJHS's maximum capacity – its new modernized building and a classroom addition - by almost 200 students. If students from Randolph Hills are added, the total number of students will exceed the HS's maximum capacity by about 350 students.⁵

Under an aggressive Growth Policy, WJHS could outgrow its modernized capacity in 12 years and eventually have hundreds of students in trailers. In fact, this overcrowding will likely appear even sooner, given the probable impact of the White Flint Phase II Plan on the WJ area.

Residential density must be in balance with public facilities. Walter Johnson does not have the capacity to absorb the projected growth in student population.

VI. The Plan Must Include a Residential Development Cap:

In addition, the plan includes a rarely discussed phase 4. In this phase, the presumed cap of 9800 dwelling units would be lifted, leading to development limited only by zoning. Under the proposed zoning, this could mean thousands of additional dwelling units. This would have a detrimental effect on schools throughout the WJ cluster, since MCPS used an estimate of 9800 residential units to predict the student population generated by, and schools needed for, the plan. It would especially impact WJHS. Further residential development will only exacerbate the serious, longterm overcrowding of this excellent HS.

To protect WJHS, phase 4 of the plan must be eliminated. The plan must include a residential development cap of 9800 dwelling units or less, treated as a residential moratorium trigger, to avoid further harm to the HS. Also, zoning related to the sector must be readjusted to ensure that no more than 9800 residences can be built. Additional development would threaten not just the capacity but the quality of the school.

VII. Impact Fees do not pay for the Full Cost of School Land and Facilities:

Despite the surprising new assertion from the developers that WF school impact taxes would raise \$71,000,000, the amount attributable to the 9800 residential units at issue in this hearing is less. If one assumes that 10 percent of those residences are low-rise units, the maximum predicted by Planning Department staff, \$49,000,000 would be generated; if none are low-rise (as seems likely from MCPS calculations) then \$43,000,000 would be.

Still, \$43,000,000 - \$49,000,000 sounds like real money, even as a one-time payment. It's not, however, enough to pay for the cost of development-related school construction in the WJ cluster. Construction for an ES in the WJ cluster now costs about \$30,000,000 – the cost of the 2 phases of construction to rebuild Garrett Park ES. The proposed development could well require 2 large modernizations, and several classroom additions, adding roughly \$40,000,000 more.⁶ So, the cost of even the first round of construction and renovation in the WJ cluster will exceed \$70,000,000.

Moreover, 1100 students will be added permanently to the cluster, but the facilities will not be permanent. They will have to be renovated periodically - forevermore. Thus, the true cost of facilities required by the White Flint development is well over \$100,000,000. And, that will not include the cost of land, which cannot be paid for with impact taxes.

Really, when it comes to resources – land and facility funding - for schools, there are only 3 alternatives: (1) the developers provide the resources, (2) the taxpayers provide the resources, or (3) the children attend crowded or substandard schools. The solution is to insist that developers do their share.

VIII. Additional Funding is Appropriate for Viers Mill ES (VMES):

We are sympathetic to the needs of students in nearby VMES. This school is highly overcrowded – at 170 percent of capacity. In addition to supporting the use of the sector's school impact taxes for the Walter Johnson cluster, we believe that VMES should receive assistance. We favor a second source of school facility funding to aid VMES.

IX. Conclusion:

We ask that you promote excellent, uncrowded schools in the WJ cluster. The Council can do this, by insisting on a plan with land dedicated for a school. The Council can do this, by establishing an absolute limit on residential development in this plan and related zoning policies. The Council can preserve the world-class education for which county schools are renowned. Let's make sure parents near a Walter Johnson school can still say: "Everybody's kids go there – it's not too crowded. And, it's excellent."

Attachment: Walter Johnson HS Growth and Crowding

¹ The Adequate Public Facilities Ordinance says, in part: “The Planning Board must not approve a preliminary plan of subdivision unless . . . public facilities will be adequate to support and service the area of the proposed subdivision. Public facilities and services to be considered for adequacy include . . . schools.”

² The numbers assume full buildout of the developments, which is a bit unlikely. However, given the Growth Policy’s many incentives for residential housing near transit, a 90 percent buildout seems reasonable. I compensate for any shortfall by not including any numbers for CR Zone bonus MPDUs or workforce housing. See attachment “Walter Johnson HS Growth and Crowding”.

³ PARCS notes that, under the Existing and Proposed Street Network (figure 43 in the sector plan), a road runs through the northern section of the original White Flint Mall/Plaza site.

⁴ See attachment.

⁵ See attachment.

⁶ Based on GPES and WJHS modernization costs, the construction cost per ES student is \$44713, and per HS student is \$48161. Assuming there would be an ES addition and an ES modernization involving 400 pupils, an MS modernization involving 380 pupils, and a HS addition involving 120 pupils, the total cost should be about \$40,655,000.