



MONTGOMERY COUNTY PLANNING DEPARTMENT
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

February 12, 2007

Memorandum

TO: Montgomery County Planning Board

FROM: Faroll Hamer, *Acting Director, Montgomery County Planning Department*
Karl Moritz, *Research & Technology Center*
Growth Policy Teams

SUBJECT: Growth Policy Study – Status Report for Transmittal to the County
Council

The County Council resolution directing the Planning Board to prepare a study of growth policy issues also directed the Planning Board to provide the Council with status reports on February 15 and April 15.

Attached please find the February 15 status report for your discussion. If this report is satisfactory, staff will transmit it to the County Council.

First Interim Report of the 2007 Growth Policy Study
Montgomery County Planning Board
February 15, 2007

Introduction

On December 12, 2006, the Montgomery County Council approved a resolution that directed the Planning Board to engage in a study of growth policy issues. In the resolution:

The County Council directs the Montgomery County Planning Board, in cooperation with appropriate County Executive agencies, to prepare an analysis of growth policy issues and recommendations for managing growth in Montgomery County. By May 21st, 2007, the Planning Board must submit:

1. *A recommended set of tools for managing growth and funding infrastructure as needed to maintain and enhance Montgomery County's quality of life, including:*
 - *proposals to direct future growth and manage the pace of that growth to promote the objectives of the General Plan;*
 - *identifying and prioritizing infrastructure needed to support existing and future residents, businesses, and visitors; and*
 - *recommendations to strengthen the relationship between the pace of growth and the provision of public facilities, services, and infrastructure.*
2. *Recommendations to better coordinate the County's growth management and affordable housing goals.*
3. *Analysis and recommendations regarding:*
 - *the current test for public school facilities and alternatives to it;*
 - *the current Local Area Transportation Review test and alternatives to it, including those considered during the 2005 Review of the Growth Policy;*
 - *Reinstating a form of Policy Area Transportation Review;*
 - *Treatment of traffic originating from outside the County and/or to destinations outside County borders,*
 - *Treatment of traffic generated by federal government installations in the County, and*
 - *Any other adequate public facilities-related issues the Board finds relevant.*
4. *An update of Planning Board's 2005 analysis of the number, age, and other characteristics of projects in the pipeline of approved development. The Board must also analyze regulations governing the time limits for the validity*

period of a finding of adequate public facilities, including extension provisions.

5. *Recommendations for measuring the success and evaluating the outcomes of the County's growth and development policies.*

The Planning Board must also analyze the County's impact tax program and ways to improve them, including analysis of the full impacts of growth and possible expansion of impact taxes for public benefits other than transportation and public schools.

The Planning Board must submit analysis and recommendations sufficient to allow County Council action on major recommendations prior to its August recess. The Planning Board may also submit recommendations for further study, analysis, and Council consideration.

The Planning Board must submit interim summary reports of progress on or before February 15 and April 15, 2007.

Prior to voting on the resolution, several Councilmembers discussed their expectations for the study and questions that they would like to have answered, either in the study or separately. These included:

- Discussion of sustainable growth.
- Fiscal responsibility as justification and goal of growth management, including analysis of infrastructure the County needs to provide to address past shortfalls.
- "What happened" in 2005 that resulted in the growth policy failing to be passed.
- Discussion of the extent to which local government officials can and cannot control growth.
- Timing of development and infrastructure. Example: Clarksburg is a transit-oriented development, but the transit won't arrive for many years.
- What should the County's investment in infrastructure have been to keep pace with our growth?
- Expecting detailed options for Policy Area Transportation and/or its alternatives.
- What is the effect of restricting growth on other jurisdictions? Will growth be pushed farther out? Tie to the Council of Government's work on regional land use scenarios¹ and activity centers.
- What is the effect of growth management on housing affordability?
- Balancing jobs and housing.

¹ The Council of Governments has released a report entitled "What If?" that looks at the characteristics of different regional land use patterns. COG representatives recently presented the material to Planning staff.

Also in December, the Planning Board approved a growth policy study work program that is designed to meet the requirements of the study resolution by the May 21st deadline.

Growth Policy Study Approach

The Planning Department is approaching the growth policy from four different perspectives simultaneously. Four teams have been created to review growth issues from these different perspectives. The four perspectives/teams are:

- ***Impacts of Growth/Fiscal Analysis:*** This team looks at how to measure/quantify all of the impacts of growth: on transportation, schools, water supply and sewerage, public safety, public health, the environment (water pollution, air pollution, etc), energy, and social equity (including affordable housing). To the extent possible by May 21st, the expected outcome will be a proposed impact tax regimen that reflects these impacts (in alignment with the General Plan), proposals for a set of long range capital facilities plans that show the required public response to the impacts of growth; and a proposed method for prioritizing expenditures of impact taxes and other revenues on these facilities. Long-range capital facilities plans could improve the County's ability to plan for these facilities in master plans, help County agencies identify gaps or disconnects among facilities plans, and improve the County's ability to require dedications or more during the development review process.
- ***Sustainable Growth Policy:*** This team is looking at the amount, type, location and pace of development that arises from the combination of the County's land use policies, plans and regulations to see if the result is something that should be modified to be more sustainable. Among the tasks of the team will be to define "sustainability" in a way that's meaningful at the County level. It will likely focus on economic growth that minimizes harm to a variety of elements, which could include: the environment, land consumption, quality of life, poverty, cultural diversity, public health, etc. Completely sustainable development, from the perspective of limiting growth to that which uses natural resources only at the rate at which they can be replenished naturally, may not be entirely possible but the concept is applicable – even in the case of fiscal resources. Another lens through which to view this subject is smart growth (more sustainable) rather than sprawl (less sustainable).
- ***Quality of Life/Design Excellence:*** This perspective champions quality design as a growth management issue. The basis for this perspective is that growth, in the form of new development and redevelopment, is acceptable to the public when it adds to their quality of life. In the past, the growth policy has said that this means maintaining adequate service levels for transportation, schools, etc. But this is a very narrow slice of the effect of growth on an existing community. Moreover, development/redevelopment is an opportunity to improve conditions for neighbors by adding desired land uses, improving auto-transit-walk-bike connections, providing an improved streetscape, and so forth. That means that design excellence is just as important as adequacy of public facilities. This team is

developing recommendations for defining what design excellence means and how to achieve it.

- ***APFO Reform:*** This team is addressing most of the specific questions posed by the Council on issues directly related to the current or former growth policy, such as policy area transportation review, handling of pipeline projects, school adequacy definitions, etc. This team is also the one to explore the Council's questions about the effects on growth management on housing affordability, regional growth patterns, and other issues.

For these four perspectives, the review process consists of the following steps:

- ***Expert presentations:*** Experts in aspects of growth management are useful resources during the growth policy study. While some of these experts have spoken or will speak to staff, those of general interest will be scheduled at a time when the public can participate. In some cases, experts are/will be scheduled to make presentations to the Planning Board.
- ***Literature review/research/identification of best practices:*** The purpose here is to see what's best of what's out there, and not reinvent the wheel.
- ***Selection of candidate approach:*** At this point planning staff will select one or perhaps more) approach that seems to best fit Montgomery County's circumstances.
- ***Application of candidate approach to Montgomery County:*** Staff would articulate how the approach and alternatives would work in Montgomery County.
- ***Recommendations to County Council:*** The recommendations that staff will prepare for Board consideration and transmittal to the County Council will be specific, and to the extent possible, be in the form of proposed legislation. Given the variety of topics that are being addressed, the recommendations will come in a variety of forms.

Timing and Products

The Council resolution has a deadline of May 21 to submit the Planning Board's recommendations, with two interim reports due in February and April. This is the first interim report. These interim reports are opportunities to keep the Council informed and opportunities to keep the public informed and to receive public input.

The May due date is so that the Council can act on something before the August break. The Planning Board may be proposing more than a narrow set of APFO rule changes, and full exploration of these would likely need more time. The Planning Board's May report may include the following:

- Recommendations that can be acted upon swiftly;
- Recommendations that should be acted upon in the fall;

- Recommendations for initiatives that should continue to be explored – perhaps spun off as separate from the formal growth policy, with a timetable for action, or perhaps incorporated into other initiatives, such as the zoning ordinance rewrite or the plan for environment and energy.

Month-By-Month Work Program

- **December:** Share work program with Planning Board and receive feedback; pick staff teams who will meet and set work logistics, assign roles, etc.; teams develop an expanded work program.
- **January:** Team meet regularly and review goals and approaches; engage in literature searches and other research about best practices elsewhere; identify and begin to interview experts in their fields.
- **February:** Staff reports project status to Planning Board for transmittal to Executive and Council. Presentation to Board is in public session and public can comment. Individual staff assignments within teams are clear; most promising avenues for continued research/analysis are identified and begun.
- **March:** Staff teams review candidate approaches and describe how they might work in Montgomery County. The team begins analyzing the most promising approach in greater detail, such as relationship to the General Plan and what actions would be needed to implement it.
- **April:** Second report back to Planning Board and Council. April could include an additional public involvement exercise if the series of public worksessions does not seem to be sufficient. Staff may need to have initial draft of report done by April 27 in order to have a Board worksession on May 11 and another on May 18.
- **May:** Board worksessions, perhaps May 11 and May 18. Transmittal to Executive and Council on May 21.
- **June-July:** Council public hearings and worksessions, with possible action on something before August break.

Staff Resources

The FY07 work program anticipated that significant staff resources would be required for the growth policy. In the normal biennial schedule, calendar 2007 is a year when growth policy issues are expected to be studied in detail. However, it was not clear when the budget was developed just how broadly and deeply growth issues would be studied. Since the Board and the Council appear to be interested in a comprehensive approach, we will need to reallocate some staff resources to the growth policy that we did not anticipate in the FY07 budget and work program.

The FY07 budget's work program shows 5.6 work years allocated to growth policy. This is approximately the same amount allocated to a master plan. In past years, the Research & Technology Center and Countywide Planning (Transportation Planning,

primarily) took the lead role in the growth policy work, with assistance from Development Review. This time, it is clear that staff resources from other divisions will be needed, including Strategic Planning, Environmental Planning, and Community-Based Planning.

The study is being directed by a “steering committee” consisting of the Acting Planning Director, division chiefs, and the leads for each of the four teams. The names of the staff on each team are listed at the beginning of each team’s interim report.

The study relies to some extent on speakers and outside experts, some of whom may require payment. There are some consultant moneys in the FY07 budget; if FY07 budgeted funds prove insufficient to complete the studies as we think necessary; we will inform the Board and propose a remedy.

Teamwork

Interim reports from each of the four teams are attached. The four teams have been working hard since the beginning of the year. The focus of the each team’s initial efforts differs somewhat by team, but common elements are:

- *Examination and refinement of the work program:* The resolution passed by the County Council has a number of specific issues that must be addressed; most of these fall within the purview of the APFO Reform Team and the others to the Impacts of Growth/Fiscal Analysis Team. Even so, for all four teams the potential scope of study could be huge. Each team has discussed how to focus their energies to deliver the best possible product in the short time that is available.
- *Research of issues:* A principal activity during the first weeks of study has been research into the best thinking on these issues and the best practices around the country. The objective is to make full use of previous relevant work. The best of these articles, papers and examples will be shared with the public on the Department’s web site.
- *Set up a speaker series:* Each team is identifying experts who will be invited to speak on growth related issues to spark interest in new ideas and to hear a variety of perspectives on growth and growth management. A subcommittee is now finalizing the speaker series plan; Community Outreach and Media Relations has agreed to manage the logistics of the series. Already, the staff has heard a presentation from an expert who discussed how the Florida transportation APFO is applied in the Miami area. The Sustainability Brown Bag Speakers Series, although initiated prior to the growth policy study, brings a variety of sustainability perspectives to the staff. The Planning Board is scheduled to hear from Jeff Speck on February 15 on the subject of design excellence.
- *Identify cross-cutting issues:* Team issue areas will overlap; teams have begun to identify what these issues are and how to coordinate their

research, selection and evaluation of options, and development of recommendations.

This initial phased of the study does not have many products as yet. Some of the teams have already compiled findings from their research that can be included in the first status report. An important component of the study is the background information from which recommendations can be made: how existing County practices work, current and future growth, and existing demands on infrastructure and other systems.

- *APFO Reform Team:* Staff members that are new to the APFO have had a “crash course” in the ordinance, its history, and how it is currently applied. This team is looking at several components of public facilities and services: transportation, schools, water and sewer, public safety, and other facilities (libraries, parks, etc). Each of these will be evaluated on the basis of: how are these now addressed by the APFO, what are the current demands on these facilities and services; what are the sources of change in demand – existing County development, future County growth, external growth, and others – and what the best options for testing the adequacy of these facilities when reviewing development proposals? The team has also identified a need to look at how the APFO is applied during the development review process to see if that can be improved. Other topics to be addressed are: the effect of growth management on housing affordability and the extent to which growth controls just “push growth farther out,” and a review of the pipeline of approved development. The APFO team has completed detailed outlines of current processes and has made significant progress in characterizing existing conditions and components of change in demand. Implementing agencies have been contacted; several coordination and information meetings have taken place or are scheduled and there are more to be scheduled. Although research continues, the team will be moving soon to the selection and evaluation of options.
- *The Impacts of Growth/Fiscal Impact Team:* This team is looking at ways to measure a broad range of the impacts of growth on schools, transportation, libraries, parks, open space, affordable housing, energy and the environment. To do this, the team is looking at the way Montgomery County has developed impact taxes as well as ways other jurisdictions across the country are assessing the impacts of growth. The team’s initial report, which is expected to be complete in time to be included in the Board’s discussion on February 15th, examines the current status of impact fees/taxes here and around the country and identifies the team’s next steps.
- *The Sustainable Growth Policy Team:* In addition to the knowledge that the team members already had, the team has conducted a review of the literature on sustainability issues, particularly how these are addressed at the local level. This information is being used to review the options for defining sustainable development from a variety of perspectives, to characterize current growth trends from a sustainability perspective, to identify the problems caused by unsustainable growth, to learn how other jurisdictions are promoting sustainable growth, and to decide how a discussion of sustainability can inform Montgomery

County's growth policy. The Sustainable Growth Policy Team's status report will include a review of some of the specific factors that will be explored by team and some of their initial findings, such as the states, counties and cities that have substantial sustainability policies and plans and some of the highlights of the articles and other documents that have been reviewed.

- *The Design Excellence Team:* This team is addressing how increased attention to excellence in design can help us capitalize on the positive aspects of growth and mitigate the negative impacts of growth. The overall goal is to make the case for design excellence and to identify ways that the County can achieve it. The team has developed its work program and has begun to complete it. The team's first objectives are to define what is meant by "design" in terms of the planning and development of private and public sector projects in Montgomery County. This includes discussing the essential elements of good design and how it promotes County objectives in such areas as safety, social interactions, health, sustainability, accessibility, diversity, and others. The team will be exploring the costs of poor design and the benefits of good design: economic, cultural, social, and environmental. They are looking at the steps in the planning/review process where design is or should be addressed: development of master plans, regulations and guidelines; review of specific private development projects, mandatory referrals, Park and Planning facilities, and public education not tied to a specific project or plan. The team is investigating how other jurisdictions have approached design excellence – goals, procedures and measurements/standards. Finally, the team will develop proposals for achieving design excellence in Montgomery County, including: the goals for design, the resources and processes needed to achieve those goals, the roles of the various participants, and recommended actions.

Growth Management

For the past several decades, "growth management" in Montgomery County has been conducted in two basic ways: by regulating the amount, type and location of future growth (the "end-state") and by regulating the pace of growth by setting conditions under which planned development could be approved ("staging").

The term "end-state" is something of a misnomer since the County's end-state of development changes each time a new master plan is approved – and to a lesser extent, when other actions are taken, such as amendments to the zoning ordinance. However, "end-state" remains a useful term because it represents what will result if all of our adopted policies and plans are pursued as adopted.

The County outlines its goals and objectives for its end-state in its General Plan and makes them explicit in its adopted master plans and sector plans. These goals include: concentrating development in growth areas, especially the urban ring and I-270 corridor, and most especially, in those areas well-served by transit; limiting development and otherwise supporting the continued vitality of the agricultural reserve; ensuring that growth is adequately served by essential public facilities; and providing housing and

economic opportunities for a diverse range of people. Tools that help the County accomplish these goals include the zoning ordinance, the transfer of development rights ordinance, the moderately-priced dwelling unit ordinance, the adequate public facilities ordinance, and the impact taxes for schools and roads that are applied at building permit. Each of these ordinances is supplemented by other public and private actions. It is also true that some General Plan goals and objectives are contrary to each other, and it is not always possible to pursue public actions that, or limit private actions to those that, support each of the General Plan's goals and objectives.

The sum total of the end-state in each adopted master and sector plan is the Countywide end-state of planned development and public facilities. On occasion, this overall end-state is examined and evaluated. Our updated population, household and job forecasts reflect our best estimate of future growth based on adopted plans. During the Transportation Policy Report Phase II process, the overall end-state of development was compared to the overall end-state of the transportation network. It was found that there was a disconnect between the two, and a product of TPR was an alternative land use strategy that provides guidance as to how future plans should allocate growth to be more efficient from a transportation perspective.

In Montgomery County, the primary vehicle for staging development has been the adequate public facilities ordinance. Reliance on that ordinance suggests that the only conditions under which planned development should not move ahead are conditions when certain public facilities – roads, schools, water and sewerage, and police, fire and health facilities – are not “adequate.” The Growth Policy further refines the definition of adequacy for each of these facilities, and there has been a common complaint that the definition of adequacy in the Growth Policy is out of step with the public's expectations for adequacy of those facilities. Although the County's APFO lists water and sewer and police, fire and health facilities, the Growth Policy is concerned primarily with roads and schools.

In implementing the APFO, the Growth Policy takes two different approaches to ensuring adequacy. The first determines if a developer needs to make improvements to public facilities, but typically does not stop a development from moving forward. Local Area Transportation Review is an example of this type of test. This type of test does not stage development in any meaningful way, with the possible exception of instances when a major improvement to an intersection – one that a private developer could not afford to make – is needed. An example would be an intersection that is planned to be a grade separated interchange. This situation can result in a *de facto* moratorium in the area surrounding that intersection until the public sector makes the improvement.

The second type emphasizes *stopping, halting, or pausing* development until facilities are adequate. The school test is the best example of this type of test: if school facilities are sufficiently inadequate to cause a moratorium, a developer must wait until the public sector restores adequacy, as there is not mechanism for a developer to make school improvements. The old Policy Area Transportation Review is a bit of a hybrid

since it often resulted in moratoria but developers were permitted to move ahead if they made the transportation improvements needed to support their development project.

In some quarters, APFOs are the enemy of “smart growth” because they tend to insist upon the same level of adequacy everywhere, which would logically result in the same level of development density everywhere: sprawl.

The Growth Policy has made some effort to adjust its procedures to reflect the General Plan’s smart growth goals and objectives, although it isn’t clear that these adjustments are/were effective. For example, both Policy Area Transportation Review and Local Area Transportation Review allow(ed) greater congestion in growth areas and require(d) less congestion in rural areas – to support concentrated development and discourage rural development. The differential in congestion levels meant that, under Policy Area Transportation Review, staging ceilings tended to be higher in growth areas of the County than elsewhere. But that did not stop moratoriums from being imposed for extended periods in areas where the General Plan expects growth to be steered. The school test has no geographic relationship to the General Plan.

The impact tax, which is separate from but complementary to the APFO, modestly reflects how the General Plan expects growth to be steered. Development in Metro station areas pays a smaller transportation impact tax. Development types that generate fewer trips and/or fewer students are sometimes the same types of development that are located in growth areas of the County (such as multi-family housing), but this is not the same as an impact tax regimen that does as much as possible to enforce General Plan goals: for example, charging rural development a very high tax, suburban development a high tax, growth areas a lower tax, and metro areas a very modest tax.

Although it appears that the current Local Area Transportation tests for Metro station policy areas effectively remove barriers to planned development in these areas, it is much less clear that the congestion standards in other areas vary appropriately, given the goals for these areas in the General Plan. As noted, Local Area Transportation Review is not designed to be an effective staging tool.

Growth policy moratoriums tended to affect mid-size projects the most, since they were too large to be considered *de minimis* but too small to be able to finance the large transportation improvement projects needed to increase an area’s staging ceilings. In some instances, there was evidence that moratoriums distorted the market: areas with long-term moratoriums saw increased applications for affordable housing projects and churches, both of which could be approved despite moratoriums. It could be argued that Local Area Transportation Review also resulted in (more modest) market distortions: in the years when the threshold for LATR was 50 trips, the County has a large number of 49-unit subdivisions.

Moratoriums were also intended to spur investment in public facilities in areas that needed them. Certainly the analysis needed to establish moratoriums also provided public officials with information about facility inadequacies, and this information was

used to program new facilities. Public funding of new transportation capacity often went to the same areas where the growth policy identified needs. In some cases, significant private investments were made in public infrastructure in order to be approved in an area under a transportation moratorium. For some, the fact that the school test has rarely (once) resulted in a moratorium since 1986 is evidence of a test that has not worked. Others can point to the significant investment the County has made in public schools as evidence of the contrary, although most people might agree that this investment would have been made even without the threat of moratorium. It is also true that the County has been quick to program new school capacity when a cluster was in danger of failing the school test.

“Smart growth” and the General Plan principles would suggest, however, that moratoriums should not be the sole, or even primary, criteria to use to allocate funds for new infrastructure. They might argue that APFOs, and especially moratoriums, get a locality in the habit of chasing the market – allocating funds to support growth where the private sector wants to grow. Smart growth recommends targeting infrastructure funds strategically to support growth in accordance with a locality’s plans.

In the 2003 Growth Policy, there was some discussion about the idea that a moratorium is an appropriate tool for staging growth in a locality that has most of its total growth yet to come, but that Montgomery County is a locality where most of its total growth has already occurred. The corollary to that idea is that in developed localities, new growth has a relatively small impact on public facilities adequacy compared to other factors, such as regional growth and changing demand of residents and workers in existing development. However, others have argued that the moratorium continues to be a useful tool when the pace of growth is outpacing the supply of facilities because (1) local growth exacerbates facilities inadequacies even if it is not the only cause of the problem and (2) local growth is something the locality can control. Possibly a middle ground in that debate is to not rely on the moratorium as the primary growth management tool, but reserving it for instances when public facilities clearly cannot absorb any additional demand.

Staff will be exploring the effect of moratoriums in greater detail during our study. Very recently, moratoriums in Anne Arundel County are described as pushing development from growth areas to areas of that County not planned for rapid growth. Our review of academic research indicates that end-state growth controls (such as the limited amount of development permitted by the zoning envelope in the Agricultural Reserve) have a much greater displacement effect than temporary moratoriums in relatively small areas. However, under Policy Area Transportation Review, some areas of the County were in moratorium for more than a decade; at times, large areas of the County were in moratorium; and rural areas of the County were not eligible for moratoriums, but the “smart growth” areas were.

Some master plans and sector plans contain staging elements. Staging elements are lists of public actions that must be taken before or while an increment of planned development is approved. The inclusion of staging elements reflects a finding that, in the

case of these plans, the Growth Policy's adequacy tests did not include all of the factors that should be in place before a component of growth can move forward. The Bethesda CBD Sector Plan staging element includes funding of the completion of a pedestrian network, attainment of transit mode share goals, and other conditions before another stage of development could move forward. Staging in plans suggests both that: staging development is still a valued concept and the APFO does not address all of the important conditions under which development should be staged. However, staging elements are in a minority of master plans and sector plans (and therefore development throughout the County is not staged), and while some variation from plan to plan is probably necessary, it is probably also true that staging should have some consistent and comprehensive elements.

Part of the justification for staging development is that while the end-state may be balanced, although TPR suggested that it is not, there is value also in achieving balance at every stage. This might mean more than ensuring that roads and schools in an area are "adequate" throughout the buildout process; it might also mean that the most efficient – the "smartest" – growth is given the most public support. It might mean that centers develop before fringe areas, rather than after the fringe areas are fully developed. In its 2003 recommendations, the Planning Board tried to move toward some of these ideas and away from a growth policy that had become a highly sophisticated accounting exercise, suggesting that:

- The reality of traffic congestion and school capacity issues means that growth, while slowing, had outpaced the delivery of public facilities, which meant that limiting development approvals was still valuable, and
- The best way to allocate limited growth capacity was by General Plan/smart growth principles: first to areas planned for concentrated growth most efficiently served by public facilities, and later to areas planned for little growth and the most difficult to serve with public infrastructure.

In 2007, we see continued interest in an adequate public facilities ordinance that has real meaning and also, in combination with other programs (such as the impact tax), strongly supports the smart growth goals of the General Plan. There is also an interest in determining which qualities of approved development projects are those that address issues that people care about. There is also a desire for the County to have a good idea of how it will get from today to our "end-state" – the staging of both private development and public infrastructure – and how to finance it, which may involve long range capital facility plans and other tools.

As much as we try to quantify it, "adequacy" is a perception – a perception that differs from one person to another and from one situation to another. For example, an adequate level of congestion in Manhattan is intolerable in Germantown. Our perception of the need for parks in downtown Silver Spring has changed recently. Growth management, then, is also about meeting expectations.

Moreover, attempting to quantify "adequacy" reduces a complex set of expectations to one or two simple variables, so that we can measure it. For example, the

adequacy of public schools is a combination of many factors, including curriculum, teaching staff, and other factors – not just the capacity of the school.

What we are trying to achieve is an integrated approach to growth management that takes these factors into account. Adding “sustainability” and “design” to the more traditional growth management tools of “adequate public facilities” and “impact taxes” is a way of addressing the public’s expectations for adequacy. It may also help us create more fully developed definitions of “adequacy” that encompass the range of expectations held by the public.