

February 2, 2016

Montgomery County Council
100 Maryland Avenue, 5th Floor
Rockville, MD 20850

Re: Whitman Cluster Comments on the Westbard Sector Plan

President Floreen, Vice President Berliner, and County Councilmembers:

The seven schools in the Whitman Cluster open their doors daily to more than 6,100 students. The cluster serves largely suburban residential communities characterized primarily by detached single family homes. Families across the cluster have a wide range of opinions on the current content of the draft Westbard sector plan, but stand united in our concern over the plan's impact on schools.

Throughout the last 19 months, local residents have repeatedly and consistently emphasized the importance of addressing the sector plan's impact on schools. Yet the draft of the sector plan currently under consideration, which is 94 pages long, only includes 2 paragraphs about schools, as follows:

There is concern among local residents that the Sector Plan will result in enrollment increases that will overcrowd the existing public school system that presently serves the Westbard Sector Plan area. Montgomery County Public Schools (MCPS) has several approaches for addressing increased student enrollment:

- *Re-open closed school sites.*
- *Build additions to schools capable of expansion.*
- *Consider minor redistricting.*
- *Locate a new school site.*
- *Provide significant additional infrastructure to support MCPS recreation.*

(Section 1.2.4., page 12)

Public Schools – The Long Range Planning Division of the Montgomery County Public School system has several options for addressing increases in student enrollment.

(Section 2.2.2., page 22)

In March 2015, many of the County Councilmembers participated in a symposium held at Bethesda-Chevy Chase High School on "Infrastructure and Growth." Residents from across the county, including many PTA leaders from the Whitman Cluster, participated in the symposium, and their message was clear: the county needs to better coordinate development and school planning. It was our hope that a new planning paradigm would emerge from the symposium – one in which planning for schools was fully integrated in the sector planning process. The Westbard sector plan provides an opportunity to demonstrate this new coordinated planning effort, but the current draft clearly fails in this regard.

What little the plan does include on schools is dreadfully generic. The "several approaches for addressing increased student enrollment" are not at all specific to Westbard, and could easily be copied

and pasted into any sector plan in the county. For the plan to demonstrate improved coordination between MCPS, planners and the Council, it must be more specific and answer the following questions:

- Which school(s) in the Whitman Cluster could absorb Westbard's enrollment burden?
- Will it be necessary to redraw the boundaries within our cluster? If so, what are the potential boundary change options?
- Which school(s) could potentially receive an addition?
- Where can new schools (elementary, middle and high school) be built to relieve the burden on our schools and those in our neighboring clusters?
- Which former school sites could realistically be reopened?
- Will it be necessary to redraw boundaries between different clusters? If so, what are the potential boundary change options?
- What other, non-standard options will MCPS consider (e.g., an intermediate school for 5th and 6th graders, or a local charter school)?
- How will the different options be prioritized?

A "Westbard Sector Plan Appendix" released by the Planning Department last week provides additional information on the various school options, but does not offer the level of specificity indicated above. Furthermore, the appendix was not released publicly before the Planning Board approved the sector plan on December 17, 2015. Therefore, it is unclear whether it is officially part of the sector plan since the public never had the opportunity to review and comment on its contents and because it did not exist at the time of the Board's vote.

The Planning Board was clear in explaining why the plan places so little emphasis on schools, despite being a top priority identified by local residents: MCPS demographers "have analyzed the Westbard plan and concluded that the school system can accommodate the additional students generated by the plan's recommendations for new housing."¹ **The plan, therefore, should demonstrate the analysis and thought that has been given to schools and explain HOW exactly the school system can accommodate these additional students.**

Part of the problem is that the Planning Board puts blind faith in MCPS demographers. MCPS said we will be fine, so we must be. But where is the due diligence? This plan should demonstrate the same level of impact analysis and mitigation for schools as it does for transportation, housing and the environment. Furthermore, such blind faith in MCPS is ill-advised. While MCPS has historically done a fine job of projecting system wide enrollment, its school specific enrollment projections are highly erratic. In the Whitman cluster alone, six-year projections that are used for capacity planning purposes have been as much as 42% off from actual enrollments.² At Pyle Middle School, the six-year projections have been off by as much as 271 students.³ Over the last 14 years, our six-year projections cluster-wide have been off by an average of 14% – that is more than 800 students cluster-wide! How can we understand our future capacity needs, with such unreliable enrollment projections?

More applicable to Westbard, however, is MCPS's ability to estimate the impact of the potential new residential development. The problem here is that MCPS does not use cluster specific student

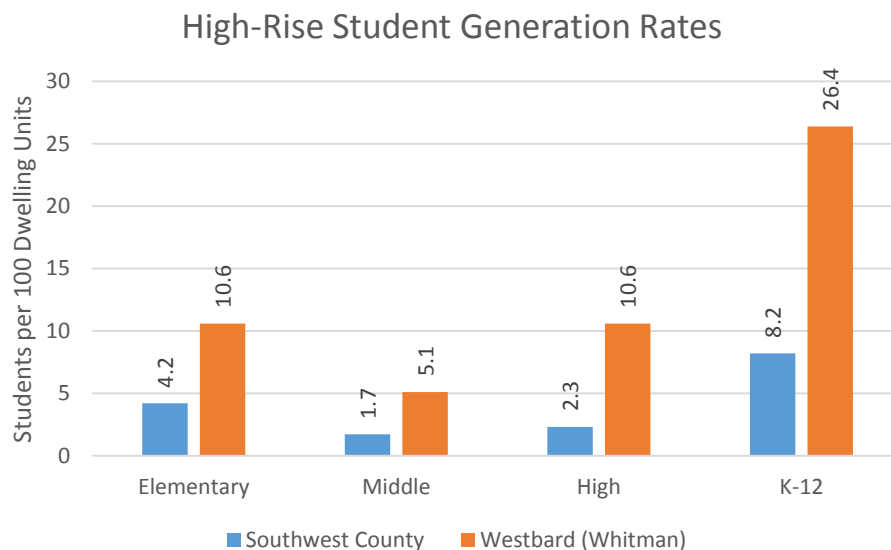
¹ This quote comes from "The Montgomery County Planning Board Newsletter," an email response from Planning Board Chair Casey Anderson to people who submitted comments to the Board on the sector plan, January 7, 2016.

² The 2005 projection for Bradley Hills Elementary School for the 2011-12 school year was 368. The actual enrollment in 2011 was 523.

³ The 2008 projection for Pyle Middle School for the 2014-15 school year was 1,208, but the actual enrollment in 2014 was 1,479.

generation rates in calculating the estimates. Despite having detailed spatial data that allows for the calculation of student generation rates within individual clusters by housing type, MCPS continues to use “southwest” regional rates to estimate the impact of new development in Westbard. **We argue that MCPS’s claim to be able to accommodate the Westbard sector plan’s enrollment impact is flawed because it ignores facts demonstrating the draw of the Whitman cluster.**

Updated figures released last week by the Planning Department show the potential for 2,480 new residential units in Westbard. The figures further indicate these could add 407 new students to the Whitman and Bethesda-Chevy Chase clusters collectively.⁴ To calculate this, MCPS uses generation rates averaged across the entire southwest region of the county. Fortunately, multi-family housing in Westbard (moderately priced dwelling units, workforce housing units, and market rate units) offers relatively affordable options to families wanting to move to the highly coveted Whitman cluster, but unable to purchase a \$1+ million single family home in one of the surrounding neighborhoods. This is clearly demonstrated in the graph below, which shows that **multifamily housing on the Whitman Cluster side of Westbard generates two to five times more students than the rates used by MCPS to estimate the sector plan’s impact on enrollment.** *Using these localized generation rates, we believe the plan could add as many as 760 students to our local schools!*



Data source: Montgomery County Planning Department

We have been told repeatedly that only three sets of Westbard property owners⁵ have demonstrated any interest in redeveloping their properties after the plan is adopted. One important thing to note, however, is that all three of these sets of properties would send students to schools in the Whitman Cluster (Wood Acres ES, Pyle MS, and Whitman HS). In other words, the impact on our cluster is imminent and will be seen immediately.

⁴ See page 113 of the newly released Westbard Sector Plan Appendix, located at <http://www.montgomeryplanning.org/community/westbard/documents/Westbard%20Appendix%201.19%20Final.pdf>.

⁵ Equity One, Capital Properties (owner of the Park Bethesda site), and collectively the owners of the American Plant and the Roof Center properties.

Our cluster is already experiencing overcrowding at all levels. Four of our five elementary schools are well over capacity. Whitman High School has used all of its available capacity and has no classrooms left to accommodate future growth. A feasibility study conducted last year outlined options for an expansion to meet projected growth at the high school, but those projections do not yet include the imminent enrollment impact from Westbard.

Our biggest concern, however, relates to Pyle Middle School, which has:

- the highest enrollment, at 1,521 students, of all middle schools in the county;
- a program capacity of 1,289 (but a gymnasium intended for only 1,000 students), giving it the highest utilization rate of all middle schools in the county;
- an enrollment bigger than seven high schools in the county (in fact, it is the second largest middle school in the state);
- the smallest plot of land (not adjacent to a park) of all middle schools in the county, thus limiting options for expansion; and,
- the least amount of space per student among all secondary schools (middle schools and high schools) in the county.

A feasibility study is currently underway for Pyle, but like the study for Whitman, MCPS is planning for projected enrollments that do not yet include the impact of Westbard's all but certain redevelopment.

In conclusion, we ask that the County Council not adopt a sector plan that doesn't include a detailed, geographically specific analysis of the impact of the plan on schools and specific potential solutions to mitigate that impact.

Sincerely,

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