

Section 4: Testing the Adequacy of Public School Facilities

4.0 Recommendations

The staff of the Montgomery County Department of Park and Planning recommend that the current test for the adequacy of public school facilities be changed. Staff recommends that the school test:

- Continue to use the current definition of school capacity;
- Consider schools to be adequate at the elementary and middle school levels when enrollment does not exceed 105 percent of capacity, and to be adequate at the high school level when enrollment does not exceed 100 percent capacity;
- Discontinue the practice of “borrowing” capacity from adjacent clusters at the elementary and middle school levels, except in clusters that have only one middle school, but continue to allow borrowing at the high school level;
- Introduce a provision whereby developers are required to make a payment toward school facilities when projected enrollment exceeds the standard (105 percent for elementary and middle schools, 100 percent for high schools) but does not exceed 110 percent of capacity; and
- Impose an absolute moratorium when projected enrollment exceeds 110 percent of capacity.

Staff’s recommendations would tighten the borrowing provisions of the current test in two ways. The first would be to end the practice of borrowing capacity from adjacent clusters at the elementary school and middle school levels, except in the case where a cluster has only one middle school. This change would recognize that at elementary and middle school levels, schools already borrow capacity from the other schools within the cluster. Only in clusters with just one middle school (Bethesda-Chevy Chase, Richard Montgomery, Rockville, and Whitman) would the AGP test continue to borrow from adjacent clusters. The AGP test would continue to borrow capacity from adjacent clusters at the high school level.

The second borrowing restriction might best be described as “borrowing only in one direction.” Members of the public that are critical of the borrowing provisions have pointed out that it does not make sense for a cluster to borrow from one adjacent cluster at the middle school level and from a different cluster at the high school level. Staff agrees and would further suggest that borrowing should be limited to one adjacent cluster at a time. Because we are recommending that borrowing not occur at elementary school level, and only rarely at the middle school level, this change has less of an effect than it would on the current AGP school test. This second borrowing restriction would have no immediate effect on the moratorium status of any cluster.

Staff’s recommendations would impose a school payment on residential development in the Damascus, Walter Johnson, Kennedy, and Northwest clusters because at the elementary school level, each of these clusters is above 105 percent of AGP

capacity but below 110 percent of AGP capacity. None of the elementary school clusters exceed 110 percent of AGP capacity. However, if enrollment increases by 109 students in Damascus, 70 students in Walter Johnson, 65 students in Kennedy, or 140 students in Northwest, an absolute moratorium would be imposed.

At the middle school level, once permitted borrowing takes place, no cluster exceeds 105 percent of AGP capacity. At the high school level, once permitted borrowing takes place, no cluster exceeds 100 percent of AGP capacity.

The payment would be required in clusters where elementary or middle school enrollment exceeds 105 percent of AGP capacity but does not exceed 110 percent of capacity, and clusters where high school enrollment exceeds 100 percent of capacity. For the payment methodology, staff relied on the analysis recently completed for Bill 9-03 Development Impact Tax – School Facilities. The rates calculated for that proposed development impact tax for schools were based on the student generation rates of various types of residential development and a goal of achieving approximately \$10 million per year in revenues, about 10 percent of the annual capital budget for school facilities.

In clusters where enrollment exceeds the standard but does not exceed 110 percent of capacity, staff recommends that developers be required to make the following payments, to be used toward new school facilities:

Single-family detached houses	\$7,840
Townhouses	\$6,440
Garden apartments	\$3,920
High-rise apartments	\$1,540
Apartments for seniors	\$0

These rates are double those that would be imposed by the development impact tax in Bill 9-03. If an impact tax is imposed, staff would recommend that they be credited against the AGP school facility payment.

Staff recommends exempting Moderately-Priced Dwelling Units and the priced-controlled units in projects qualifying for the Special Ceiling Allocation for Affordable Housing from the payment. Staff would further recommend that projects qualifying for the Special Ceiling Allocation for Affordable Housing be permitted to be approved in clusters exceeding 110 percent of AGP capacity if the school facility payment is made on the market rate units.

Staff is not recommending that small-scale development be exempt from the AGP school test moratoriums. The moratoriums would only be imposed when a cluster exceeds 110 percent of AGP capacity, a condition which staff believes is sufficiently severe to warrant restrictions on the approval of even small-scale development.

4.1 Goals for the School Test

In staff's February 14, 2003 memo to the Montgomery County Planning Board staff reviewed its goals for improving the AGP's school test. Staff noted that some of the desired attributes are complimentary but others may not easily be achieved by one test.

In the memo, staff suggested the school test should:

- *Better reflect how crowded classrooms really are:* The test should describe the true experience of level of crowding in schools, and relate as much as possible to how enrollment and capacity are measured for school planning purposes.
- *Be transparent:* It should be clear to all how the numbers are calculated.
- *Affect the pace of development appropriately:* The school test should do a good job of reflecting the relationship between approvals of residential subdivisions and school crowding.
- *Address developer contributions:* the County Council has requested at least one option "for the Council to consider that would allow a residential development to be approved in a cluster where school facilities are inadequate if compensatory steps can be taken."
- *Set or reflect development priorities:* The test itself, or some part of the AGP, should either reflect priorities for where the County wants to see development happen – such as development near Metro – to help steer funding so as to provide adequate facilities in those areas.
- *Achieve consensus among various agencies, the County, and the Cities:* Over the past several years, there has been heightened interest among the public officials in Montgomery County and the cities of Gaithersburg and Rockville in identifying a mutually satisfactory approach to the school test.

Staff recognizes that our set of recommendations addresses some of these goals more fully than others. Further, we understand that there will be disagreement about how well the recommendations addresses these goals.

4.2 Aspects of the School Test

In the February 14 memo, staff reviewed aspects of the current school test that could be changed and alternatives that should be explored. The following section will discuss staff's review of those aspects. The following section, *Options and Results*, shows the results of testing options that vary.

4.2.1 Calculation of Capacity

The AGP currently uses a set of standard capacities (“AGP capacity”) for classrooms; e.g., the AGP counts all elementary school classrooms as having a capacity of 25 students. Capacity calculations do not include portable classrooms.

Among the alternatives to the current capacity numbers that staff considered, several options stand out:

- *MCPS program capacity.* These are the capacity figures used by MCPS for planning purposes. It defines the capacity of a classroom based upon the type of use to which it is put.
- *Adjusted AGP capacity.* Overall, “AGP capacity” is a bigger number than MCPS program capacity. At the elementary and middle school levels, MCPS program capacity is 92 percent of AGP capacity; at the high school level, MCPS program capacity is 94 percent of AGP capacity. An alternative to current AGP capacity figures is to apply new standard AGP capacity figures that are 92 percent of the current numbers at the elementary and middle school levels (that is, the capacity of an elementary school room would be 23 students instead of 25 and a middle school classroom’s capacity would be 21 instead of 22.5) and 94 percent of the current number for high school classrooms (the high school classroom capacity would be 21 instead of 22.5).
- *Stated-rated capacity:* Stated-rated capacity varies classroom capacity by program, and its capacity definition is in some cases, smaller than MCPS program capacity. For example, state-rated capacity of a secondary classroom is .85 times 25 (or 21.25) while MCPS program capacity for the same classroom is .90 times 25 (or 22.5).
- *Core Capacity:* This option would base a school’s capacity on the number of students that can be accommodated by its core facilities (cafeteria, gymnasium, auditorium) rather than its classrooms.

A more thorough review of the attributes of each of the various definitions of capacity will be included in the Technical Appendix, to be released shortly after this report.

In our evaluation of the options for defining capacity, staff decided that standard multipliers were better for calculating classroom capacity than “MCPS program capacity” because we did not want to see programming decisions too closely tied to the AGP test and because we felt that standard multipliers are more “transparent,” that is, easier for the general public to understand and see applied.

Because of the many other options that were explored, MCPS had not completed its “core capacity” option before the deadline for this report. We will review the results of that method as soon as it is available. Although there are some positive aspects to using core capacity, and there’s no denying that overburdened core facilities can seriously

diminish the education experience, in general, staff believes the students per classroom figure is a better measure of the adequacy of school facilities since most teaching occurs in the classrooms.

Once staff decided that standard multipliers were the best approach, we then decided to retain the current definition of capacity and focus our attention instead on the standard of adequacy.

4.2.2 Standard of Adequacy

The AGP's current standard is that enrollment should not exceed 100% of capacity. As long as there's consensus on the definitions of enrollment and capacity, 100% is the point at which schools become crowded.

Staff reviewed the results of various options using a range of standards. A selection of the results is included in this report; the results of a wider number of options will be included in the technical appendix. As promised, staff also evaluates a two-stage test: when enrollment is between 100% and 110% of capacity, payments are required; above 110%, the moratorium is absolute.

The results of these tests are discussed in the next section, *Options and Results*. Staff selected a two-stage approach for several reasons, the main ones being:

- The test will identify clusters that are not yet severely over-capacity but which are moving in that direction. Payments from development can help fund solutions.
- Once severely over-capacity, a cluster can benefit from a moratorium on new development. Although new development is not the only cause of school enrollment changes, in a severely over-capacity cluster it is important to limit enrollment growth as much as is possible.

Staff's recommendation, however, is that at the elementary and middle school levels, the payments be required when enrollment exceeds 105 percent of capacity, rather than the 100 percent threshold which was first tested. Staff recommends the 100 percent threshold for payment at the high school level, however. Use of a 100 percent AGP capacity threshold at the elementary school level would require payments from development in nine clusters: Blair, Churchill, Damascus, Einstein, Walter Johnson, Kennedy, Northwest, Watkins Mill, and Wheaton.

Staff recommends that there be no geographic restrictions on where the collected money could be spent, as long as it is spent on school facilities that add capacity.

4.2.3 Geography

The school test is now applied at the cluster level of geography. There are currently 23 clusters. Reasons to favor this approach: clusters reflect real boundaries; 23 areas is a manageable number of areas to test. A problem with this approach: adding up

enrollment and capacity over a whole cluster may mask crowded schools, especially if “adjacent capacity” rule is kept. Staff evaluated alternatives to the cluster as the testing geography, including smaller geographies (such as middle school boundaries) and a larger geography (super clusters) that would eliminate borrowing from adjacent clusters.

The results of these tests are discussed in the next section, *Options and Results*. Staff recommends keeping the cluster as the geography for testing, because it relates closely to how schools are planned and programmed, and it is, by and large, the geography by which students relate to their schools.

Staff also reviewed an option which compares total enrollment for all grade levels in a cluster and compares that figure to total capacity. Although we are not recommending that option as a method for testing adequacy, clusters that fail this test would be crowded at multiple levels.

4.2.4 Adjacent Capacity (“Borrowing”)

In the present AGP test, clusters over 100% of capacity are not put into moratorium if there’s capacity in adjacent clusters. Reasons to favor this approach: it reflects our ability to move cluster boundaries and some feel that boundary changes are preferable to imposing moratoriums on new development approvals. Problems with this approach: borrowing makes test hard to fail; some clusters have many adjacent clusters while others do not; a boundary change may not be realistic in the case where you need to “borrow” from one cluster for high schools and another for elementary schools.

Among those who favor a revision to the school test, the “adjacent capacity” rule receives particular criticism. Staff evaluated several alternatives to the current rule, including not counting capacity in adjacent clusters, testing at a smaller geography (with and without counting adjacent capacity), and requiring that if you borrow at more than one level, you must borrow from the same cluster for all levels.

If our February 14 memo, staff noted that “since there are multiple elementary schools within a cluster, it can be argued that elementary schools are borrowing adjacent capacity from other schools within the cluster even before adjacent cluster capacity is included; an option for the elementary school level may be to no longer count adjacent cluster capacity but raise the standard to something higher...”

Staff is recommending restricting “borrowing” at the elementary and middle school levels, except in the cases where a cluster has only one middle school. These clusters are Bethesda-Chevy Chase, Richard Montgomery, Rockville, and Whitman. Staff also recommends that in these four clusters, if borrowing is needed to pass the AGP test at both the middle and high school levels, the borrowing at both levels should be from the same cluster. Staff also suggests that borrowing at any level should be from one cluster at a time. If there is no single adjacent cluster from which a cluster can borrow enough capacity to pass AGP tests, this signals to staff that capacity deficits are acute.

The results of the various borrowing options are discussed in the next section, *Options and Results*.

4.2.5 Point of Application

Currently the school test is applied once per year and the findings of “adequate” or “inadequate” stay in effect for the entire year. Individual subdivision approvals are taken into account after they are approved when new school forecasts are prepared. Although this approach provides a high level of “certainty” for developers, it means that individual subdivisions are not reviewed for their impact on schools.

The two main alternatives to the current system are:

- *to apply the current test, but more than once per year.* The current test is applied in July; the Council could revisit the test every January. Although capacity numbers seldom change over the course of a year, enrollment forecasts are updated in the fall of each year.
- *To test each proposed subdivision for its effect on schools.* This could be a system similar to the current transportation staging ceilings, where the Council determines annually the number of housing units that can be approved in any cluster over the coming year. Alternatively, the County could develop a method for reviewing individual subdivisions for their impact on schools.

Staff is not recommending a change to the current system. We believe the two-stage test (buyout at one stage, moratorium at the other) provides the same benefit as testing more often, with the added benefit of requiring development to make a payment toward relieving school capacity deficits. Staff’s concern about testing individual subdivisions is that it adds considerable complexity to the process – a complexity that our experience with the transportation tests tells us will only become greater over time as we discover a variety of special cases where the standard test does not provide the desired result.

4.2.6 Exemptions/de minimis

In the current AGP, residential subdivisions of any size are subject to a school moratorium, with the exception of senior housing. The lack of exemptions has not been much of an issue since only one moratorium has been imposed, and in that case, it was imposed very briefly and all pending subdivisions were grandfathered.

The transportation test has a “*de minimis* rule” – development projects which will generate 5 or fewer automobile trips are exempt from the transportation tests. There could be a *de minimis* rule for schools; e.g., development generating 5 or fewer students could be exempt. Staff does not feel strongly about this issue, but we feel there are two good arguments against a *de minimis* rule for schools. First, staff is not recommending that an absolute moratorium be imposed until projected enrollment exceeds capacity by 110 percent, at which point additional approvals would have an amplified effect on

school crowding. Second, small-scale residential development is a large and growing proportion of all residential subdivision approvals and small scale projects a potentially more likely to build out within the 5-year AGP timeframe.

However, others may disagree. The amount of residential development which would generate 5 or fewer students is 9 single-family detached housing units, 11 townhouses, and 18 multifamily units.

The second major category of possible exemptions to the school tests is affordable housing. In clusters that fail the adequacy standard but are not in an absolute moratorium⁴, staff recommends exempting Moderately-Priced Dwelling Units and the priced-controlled units in projects qualifying for the Special Ceiling Allocation for Affordable Housing from the payment. In clusters exceeding 110 percent of capacity, staff would further recommend that projects qualifying for the Special Ceiling Allocation for Affordable Housing be permitted to be approved if the developer agrees to pay the school facility payment on the market rate units.

Even with exemptions on affordable housing, staff's recommendations will tighten the school test overall, and we believe the potential benefit of additional affordable housing projects outweighs the potential impact on school adequacy.

4.2.7 Terminology

In the current AGP, an area that passes the school test is termed "adequate," while an area that doesn't is termed "inadequate." If staff's recommended two-stage approach is adopted, this terminology is no longer sufficient. In its place, staff recommends calling clusters where enrollment is below the adequacy standard as "open" to new approvals, clusters that exceed the adequacy standard but are not in an absolute moratorium¹ as "open with payment" to new approvals, and clusters where enrollment exceeds 110 percent of capacity as "closed" to new approvals.

4.2.8 School Facilities Payments

Currently there are no provisions for a developer to make payments toward school facilities in order to mitigate impact of his development. The County Council identified this as an issue that should be addressed in this AGP Policy Element. Among the options that can be considered:

- Developer pays a flat rate tax that funds capacity improvements, which might be anywhere in the County, or only in the same cluster (or other geography), or only in same or adjacent cluster (or other geography)

⁴ Clusters where elementary or middle school enrollment exceeds 105 percent of capacity but not 110 percent of capacity, or clusters where high school enrollment exceeds 100 percent of capacity but not 110 percent of capacity.

- Developer pays into an escrow account a pro-rata share of the cost of a specific school improvement or set of improvements for that area. These improvements must be approved by the Board of Education.
- There is a countywide tax that all goes into effect whenever one cluster goes into moratorium.
- The tax is one that the homebuyer pays over time (such as in Charles County).
- There is a 2-stage test (buyout at one stage, moratorium at the other) such that: when enrollment exceeds a certain level, a school facilities payment is required; when enrollment exceeds a higher level, there's an absolute moratorium.

Two years ago, in the *2001-2003 AGP Policy Element*, Park and Planning staff proposed that the development impact tax for transportation be imposed countywide. Staff's recommendation was fairly general at first; as specific legislation was introduced we prepared comments for the Planning Board to consider transmitting to the County Council on aspects of the legislation that relate to Park and Planning's areas of responsibility and expertise.

As of the writing of this report, the County Council is considering a development impact tax for schools. It is not clear if the tax will be adopted, and if so, whether it will be in the form in which it is proposed or in another form. Unfortunately it was not possible for Planning staff to prepare a recommendation on this issue for consideration by the Planning Board and transmittal to the County Council in time for their vote on the development impact tax for schools.

In general, staff supports the imposition of a countywide impact tax for schools. We believe that the approach taken in Bill 9-03 in assessing a development impact tax for schools is a logical one, and we have used it as the basis for our recommended school facilities payment. Bill 9-03's approach is to identify a desired revenue stream, in this case \$10 million per year, and impose rates on residential development based upon their comparative students generation rates that will, on average, generate the desired revenue. According to Council staff, \$10 million per year is about 10 percent of the school facilities annual capital budget. The money raised by the impact tax would have to be spent on facilities that add capacity to schools.

For the school facilities payment to be made on subdivisions in clusters where projected enrollment exceeds capacity by more than 105 percent but not more than 110 percent, staff is recommending that the rates be double those proposed in Bill 9-03. Staff believes these rates are substantial but not excessive. In addition, basing the payments on a multiplier of the impact tax is preferable to having two payments that are calculated differently.

Staff's recommended rates are:

Single-family detached houses	\$7,840
Townhouses	\$6,440
Garden apartments	\$3,920
High-rise apartments	\$1,540
Apartments for seniors	\$0

Staff considered, but we are not currently recommending, methods of calculating payment rates based on the capital needs of individual clusters, or based on the costs of specific improvements. As our experience with transportation infrastructure tells us, these methods could result in payment rates that are very different from cluster to cluster.

The AGP Policy Element process requires that Park and Planning staff provide initial recommendations that are then reviewed and commented upon by public officials, their staff, and the general public. We recognize that through the course of the review period, those with greater expertise in school facilities planning and funding may devise a better approach than our initial recommendation.

4.3 Options and Results

Park and Planning staff reviewed each of the options with the assistance of the Montgomery County Public Schools staff, who provided an enormous amount of information including the results of a dozen testing options. Staff's review was conducted with the participation of County Executive, County Council, and MCPS staff. All of their insights were helpful and informed staff's recommendation. However, we recognize that each of these staff's have their own perspective and may ultimately recommend different approaches.

In this report, staff will review the summary results of eleven of the twelve options (results of the core capacity test are still pending). The detailed results – enrollment and capacity figures for each cluster and grade level – of four options will also be reviewed. The detailed results of all dozen options will be included in the technical appendix to be released soon after this report.

The Table on the next page summarizes the results of eleven of the school test options. These options are:

1. Option 1 is the current test, which uses "AGP capacity," sets the adequacy standard as 100 percent of capacity, and allows borrowing from adjacent clusters at all grade levels. *No cluster fails this test.*
2. Option 2 would determine the average amount by which "AGP capacity" exceeds "MCPS program capacity" and reduce "AGP capacity" by that amount. This method would result in capacities that are 92 percent of the current multiplier at the elementary and middle school levels and 94 percent of the current multiplier at the high school level. This test is the same as changing the current standard of

adequacy from 100 percent to 92 and 94 percent, respectively. *Eleven clusters fail this test at the elementary school level, none at the middle school level, and six at the high school level.*

3. Option 3 would substitute “MCPS program capacity” for “AGP capacity,” but sets the standard of adequacy at 110 percent (MCPS program capacity is, on average, smaller than AGP capacity). The current method of borrowing would be permitted in this option. *No cluster fails this test.*
4. Option 4 would use “State-rated capacity,” with an adequacy standard of 100 percent, and would permit borrowing from adjacent clusters. Illustrating the fact that state-rated capacity is a smaller number than both MCPS program capacity and AGP capacity, more clusters fail this test than any other. *Fifteen clusters fail this test at the elementary school level, one fails the test at the middle school level, and twelve fail this test at the high school level.*
5. Option 5 is a variation of the current test, or Option 1. However, it would limit borrowing of adjacent capacity so that if a cluster needed to borrow capacity at more than one level, it would have to borrow from the same cluster (or “in the same direction”) at all levels. *No cluster fails this test.*
6. Option 6 keeps AGP capacity and keeps the adequacy standard at 100 percent. However, it does not allow borrowing at the elementary school level, and only allows borrowing at the middle school level when a cluster only has one middle school. It continues to allow borrowing at the high school level. *Nine clusters fail this test at the elementary school level, none at the middle school level, and none at the high school level. At the middle school level, enrollment at two clusters (Bethesda-Chevy Chase and Whitman) would be greater than 100 percent, but these are clusters with only one middle school.*
7. Option 7 (the recommended test) is the same as Option 6 but raises the standard of adequacy from 100 percent of capacity to 105 percent of capacity for elementary and middle schools but keeps it at 100 percent at high schools. Capacity borrowing would not be permitted at the elementary school level, or at the middle school levels except in clusters with only one middle school. *Four clusters fail this test: Damascus, Walter Johnson, Kennedy, and Northwest.*
8. Option 8 raises Option 7’s standard for elementary and middle schools to 110 percent, but keeps it at 100 percent at high schools. Capacity borrowing would not be permitted at the elementary school level, or at the middle school levels except in clusters with only one middle school. *No cluster would fail this test.*
9. Option 9 would use MCPS program capacity and set the standard for adequacy at 110 percent. It would use middle school areas as the geographic basis for testing elementary schools and middle schools. Elementary and middle schools would be allowed to borrow capacity from adjacent middle school areas. High schools would be able to borrow capacity from adjacent high schools. *One middle school area, Rocky Hill, fails this test, due to a lack of capacity at the elementary school level.*

10. Option 10 would use AGP capacity and the standard of adequacy would be 100 percent. However, the geographic basis for testing would be Community Superintendent Areas; that is groups of clusters. The effect of this test would be to restrict borrowing to clusters within the same Community Superintendent Area. Under this test, three clusters would fail (Einstein, Kennedy and Blair) due to a capacity deficit at the elementary school level.
11. Option 11 would use AGP capacity and set the standard at 100 percent of capacity. There would be no borrowing from adjacent clusters at any level. However, school enrollment and capacity for all levels within a cluster would be aggregated and compared. In other words, total cluster enrollment would be compared to total cluster capacity. *Under this approach, one cluster would fail the test, Northwest.*
12. Option 12 will be a “core capacity” option which staff will review as soon as it is available.

Staff selected its recommended approach based on a combination of methodology and results. That is, we wanted a sound methodology that yielded results that make sense. In terms of results, staff was looking for a test which would fail only those clusters for which there was likely to be general agreement on their level of crowding. The results of Option 7 make sense to staff because this approach identifies what we understand to be the four most crowded clusters in the system at the level (elementary schools) at which they are the most crowded.

Staff’s recommended approach would require development in four clusters to make the school facilities payment. These clusters are Damascus, Walter Johnson, Kennedy, and Northwest. No cluster would be put into an absolute moratorium, but enrollment would have to increase by 109 students in Damascus, 70 students in Walter Johnson, 65 students in Kennedy, and 140 students in Northwest for the absolute moratorium to be imposed. MCPS staff has identified capital projects that would add capacity in each of these four clusters. They are:

- Damascus: a new elementary school (Clarksburg #7)
- Walter Johnson: an 8-room addition to Farmland Elementary School and an approximately 6-room addition to Garrett Park Elementary School.
- Kennedy: reopening Arcola Elementary School
- Northwest: a new elementary school

If staff’s recommended approach is not adopted, staff’s preferred alternative would be to lower the threshold for requiring school facilities payments from 105 percent to 100 percent. This would increase the number of clusters where payments are required from four to nine. The main reason this is not staff’s recommended approach is that we would like the AGP test to focus on the limited number of clusters where crowding is the greatest concern. By focusing on the clusters where the situation is most acute, the AGP has the best chance of being effective in its role of highlighting to public officials where public funds should be spent on new facilities.

4.4 Additional Information

As noted in this section, staff plans to release a technical appendix to the AGP Policy Element as soon as possible. The technical appendix will contain the detailed results of all of the options tested, as well as additional information about the various capacity measures. The technical appendix will also address technical questions raised by the Planning Board and County Council during their February AGP discussions.