

**Sayers, Margery**

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**From:** LISA MARKOVITZ <lmarkovitz@comcast.net>  
**Sent:** Thursday, October 31, 2019 9:51 AM  
**To:** CouncilMail  
**Subject:** Thank you, CB42 measurement request

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FINANCIAL IDEA - How about quantifying every exemption you need, for example affordable units, and take that amount and add it to the market unit increase? Otherwise, we will keep robbing Peter (literally here) to pay Paul. :)

REGIONAL NEED - We should be charging different rates per region, and for different types of development. The need for regional labels to apply to project forecasts was proven by the example of River Watch which was done for other reasons, which then proved the forecast wrong, and higher. The answer there is that when you do a review of a particular project it is off, but the county average of the type of unit is okay? Then why aren't we charging regional fees? Building in crowded areas should cost more. Traffic remediation requirements are done by specific need. We need to define regional education impact to be fair.

MATH -

Hopefully, using 42% will get a decent increase derived. Putting a lot of stock in this configuration though, is dangerous without changing how it is derived. We know many data analysis problems exist there. Please request that the school system provide regional averages, and not per unit information that are by definition countywide averages. Please insist there be alterations for 2 and 3 bedroom units, or define them as separate types of units. An "apartment" is not enough of a label, when 2 and 3 bedrooms are practically more units.

How much data do you need to know this common sense situation? More bedrooms mean more students, there is no question, likely close to the exact multiplier, three bedrooms, three times more kids, and if there aren't many of those, there are certainly still plenty of two bedroom apartments.

Thank you for verifying with Renee Komen how the chart is derived to estimate student enrollment from resales. She pretty much confirmed that the resale number is inflated, so 42% is NOT an underestimate at all, given after ONE year (I was previously told two), is no longer "new".

Given that label change, how on earth could development produced student NOT decrease every year, regardless of the truth? They also do not take the same students from that originally "new" and keep them labeled as "new" when going forward to do these snapshots. The students were brought from new development, and go forward, mostly, to grade 12, relabeling them doesn't change that.

AFFORDABLE -

Thank you for separating the protection of current project financing with grandfathering, and on-going projects that need to have rates established and known, and not just exempted. Having the rate of impact fee much HIGHER than the fee-in-lieu of providing affordable housing DOES give incentive to

PROVIDE them countywide, versus the opposite opinion that was stated. Thank you for your careful attention to the fees in lieu and not create incentives that conflict, and addressing alternative compliance as a factor to address.

Please consider again the regional aspect of what you want to do with affordable incentives, as we don't want to continue to concentrate and in the most crowded schools as well.

If you are going to compare what Montgomery County does with exemptions please remember they charge the highest rates in the state overall.

#### GRANDFATHERING -

You are trying to amend a serious problem in the School System. You have goals to fix several problems in the School System. Predictability is always considered for developers. It has become an issue in the County that many are upset about individual homeowners not having that same consideration. County officials have taken a strong stand that this is something to be sacrificed when we have to implement important County goals. Maybe we should think about having a little more room on the side of less profit, to fund our school system, and grandfather at permit granting, after all, we should be in this all together, developers included. I was told by an attorney that the last step in MD law is construction beginning not permit granting.

PHASE-IN - that would be entirely inappropriate. Predictability is one thing, but we have been working on this for so very long, and all who are in this situation, have been expecting this for a very long time. We have allowed woefully low fees for so long, figuring out grandfathering is enough of a safeguard to financial fairness, we should not even consider phasing in of the increased fee.

Thank you for your hard work,  
Lisa Markovitz