



# CHAPTER 10

## MANAGING GROWTH

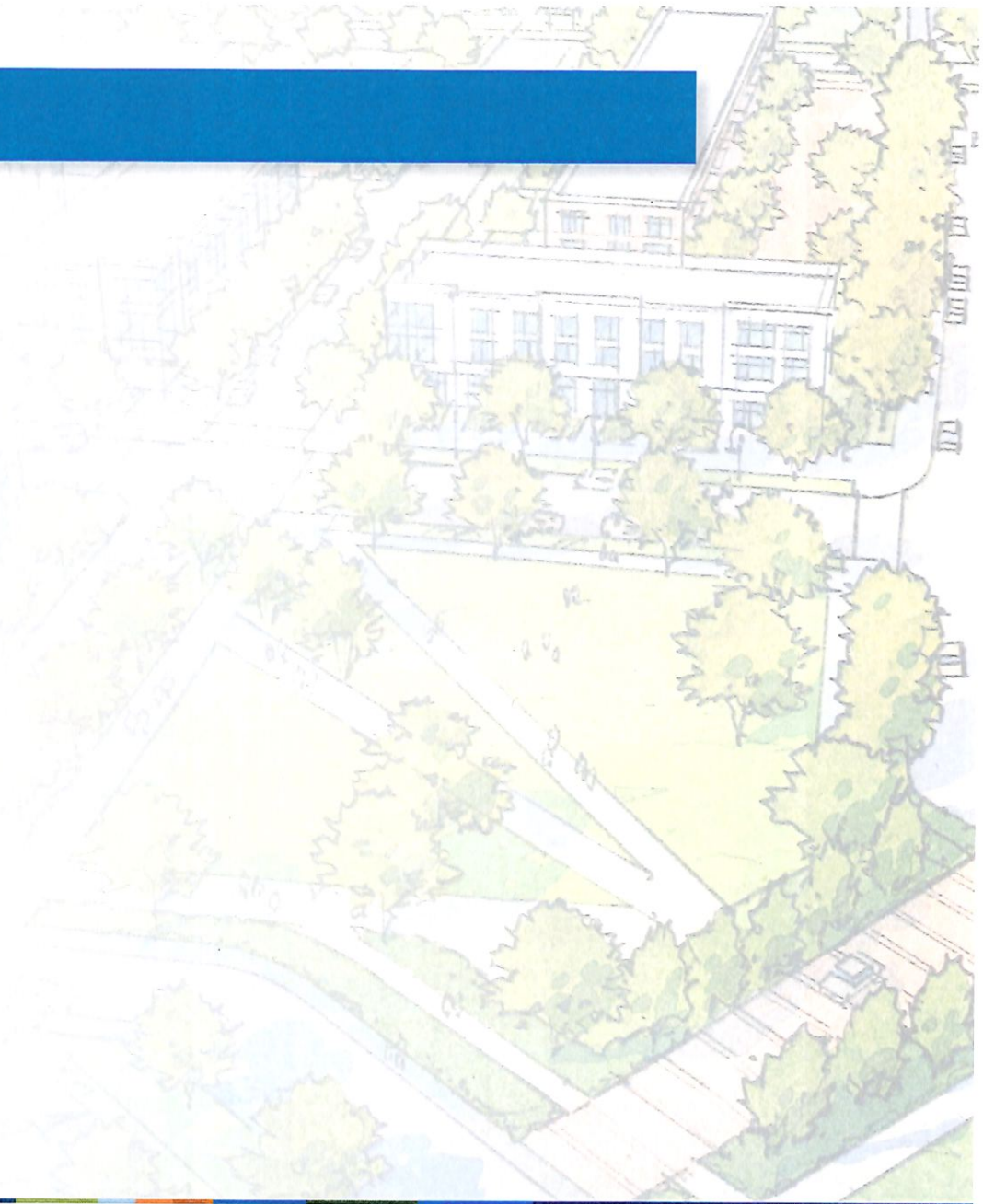




# MANAGING GROWTH

Howard County has had a growth management system in place since the adoption of the Adequate Public Facilities Ordinance (APFO) in 1992. Prior to the adoption of APFO, residential growth in Howard County in the late 1980s was exceeding 4,000 homes per year and occurring faster than infrastructure could keep pace. The APFO regulations control the pace of residential development and aim to ensure the adequacy of school and road capacity in relation to growth. The pace of residential growth is set by the General Plan and controlled by a system of annual housing allocations that limits the amount of new residential development that is allowed to advance through the plan review process each year. The APFO housing allocation chart, which controls how allocations are distributed geographically to achieve General Plan policies, is adopted annually by the County Council (see Chart 10-1 on page 8).

Since 1992, APFO has worked to evenly pace new residential development over time and pause construction in crowded school districts to allow time for school capacity issues to be addressed. Techniques to address school capacity have included the construction of new facilities, expansion of existing facilities, and redistricting of students. APFO also requires traffic impacts to be mitigated for both residential and nonresidential development at the cost of the developer. APFO has been amended over time, typically with the adoption of each new General Plan.





# Residential Growth Targets, 2020-2040

HoCo By Design has set a target of approximately 1,580 new units per year. This future growth represents a similar pace compared to the last 20 years, when an average of 1,537 new units were built annually.

Future growth in Howard County is expected to be modest given the limited amount of vacant land upon which housing and other development can occur. Most of the County has already been developed or preserved as agriculture, parks, and open space, and there is limited land left for the typical greenfield development that occurred in previous decades. Additionally, much of the remaining land is constrained with environmental features, difficult topography, limited access, or other physical features that restrict ultimate yield. This dwindling land supply and the challenges associated with developing it naturally reduce growth opportunities.

However, the HoCo By Design Market Research and Demand Forecast (prepared by the consulting firm RCLCO) shows demand for new housing in Howard County remains strong and is necessary to support job growth and a healthy jobs/housing balance. As further described in the Growth and Conservation Framework chapter, RCLCO found potential to add 59,000 jobs in Howard County between 2020 and 2040, resulting in demand for 31,000 new homes to accommodate households associated with the job growth. The RCLCO market analysis also identified a current "pent-up" potential demand for 20,000 more housing units tied to those who work in Howard County but live elsewhere in the region. An inadequate supply of housing exacerbates housing affordability challenges, as further described in the Dynamic Neighborhoods chapter. A lack of housing choices also makes recruiting workers more difficult, as they are priced out of the local market. Further, the fiscal study for this Plan indicates that new growth is important to maintain the high quality of life and service levels that Howard County residents and businesses value and have come to expect.



To meet these demands, HoCo By Design provides a strategy for redevelopment, as detailed in the Growth and Conservation Framework chapter. The Future Land Use Map (FLUM) shown in that chapter divides the County into 18 character areas and focuses future growth into activity center redevelopment areas—many of which were included in the last General Plan, PlanHoward 2030. However, the locations of these activity centers are more targeted, as compared to PlanHoward's growth and revitalization areas. To the extent specific parcels are identified it is for illustrative purposes only. Although targeted, that does not mean they can or will be redeveloped.

Among the activity centers depicted on the FLUM is a Regional Activity Center in Gateway. As described in the Economic Prosperity chapter, HoCo By Design calls for the development of a master plan for the Gateway Regional Activity Center. The Gateway master plan will summarize the area's future development phasing and intensity, mix of uses, open space network, building height range, and infrastructure approach. Establishing commercial, housing, school capacity, and transportation measurable goals for Gateway will be the foundational goals of the Gateway Regional Activity Center master plan. HoCo By Design's growth targets will need to be adjusted when the master plan for Gateway is completed, using an amendment process similar to the Downtown Columbia Plan in 2010. Specific growth targets will be identified through the Gateway planning process and any development in the Regional Activity Center will take place over 30 or more years. A separate, specialized APFO program should be created for Gateway to address transportation needs and school capacity. Given this long-term development horizon, multiple future General Plans will incorporate the plan for Gateway.

In addition to the Gateway master plan, development in many of the other activity centers, as shown on the FLUM, will require amendments to the County's Zoning Regulations, Subdivision and Land Development Regulations, and associated design guidelines to shape the character of new development. Amendments to these regulations should allow for accessory dwelling units and better regulate infill development to maintain the character of existing neighborhoods.

In addition to the Gateway master plan, development in many of the other activity centers, as shown on the FLUM, will require amendments to the County's Zoning Regulations, Subdivision and Land Development Regulations, and associated design guidelines to shape the character of new development. Amendments to Consideration should be given to amending these regulations should allow for accessory dwelling units and better regulate and allowing limited accessory dwelling units, as well as better regulating infill development to maintain the character of existing neighborhoods.





# Adequate Public Facilities Ordinance (APFO)

**CORRECTED**

## Housing Unit Allocations

APFO sets the pace of new residential development through an annual housing allocation chart, which caps the number of new units that can be built each year by geographic region. Once the annual cap is reached, subdivision plans are placed “on hold” until the next year when more allocations are made available.

The allocation chart for HoCo By Design is shown in Table 10-1 and includes the years 2026-2040. This allocation chart is based on the approximately 1,580~~1,620~~ housing units targeted per year over the 15-year timeframe of this chart. Allocations are granted, if available, once the initial subdivision or site development plan is approved. Given that it typically takes several years for the development review process to be completed (to final plat recordation and site development plan approval), allocations are granted three years ahead of when the new units are expected to be built. Since HoCo By Design has been presented for adoption in 2023, the first year on the allocation chart is 2026.

There are four geographic regions in the HoCo By Design allocation chart: Downtown Columbia, Activity Centers, Other Character Areas, and Rural West. Allocations amount to an average total of approximately 1,580~~1,620~~ new residential units per year over the 15 years in the chart, including ~~Green Neighborhood and Affordable Housing~~ units. The number of units in each region is tied to the future land use capacity as modeled and estimated in the Future Land Use Map (FLUM). ~~In addition to the four geographic regions, the allocation chart for HoCo By Design maintains the set-aside incentive of 150 units per year for Green Neighborhood developments. Projects using Green Neighborhood allocations must meet the Green Neighborhood requirements, as specified in the Howard County Subdivision and Land Development Regulations.~~ The total annual average of approximately 1,580~~1,620~~ units is significantly less than the 2,084 units targeted in the allocation chart of the previous General Plan, PlanHoward 2030. However, since the County has only realized an annual average of about 1,500–1,600 units per year over the past decade, the revised target of 1,580~~1,620~~ units is a realistic measure given the remaining land available and multiple factors influencing growth.

~~Just as the housing allocation chart offers a set-aside incentive for the Green Neighborhood program,~~ HoCo By Design proposes an Affordable Housing set aside incentive as well. These additional allocations could help increase the supply of affordable housing units above and beyond what is required under the County’s Moderate Income Housing Unit (MIHU) program, and could assist the County with reaching the affordability and accessibility targets recommended in the Housing Opportunities Master Plan. As noted in the Dynamic Neighborhoods chapter, ideal locations for these set asides could be in mixed-use activity centers, redeveloped multi-family communities, and within the Affordable Housing Overlay Zoning District.

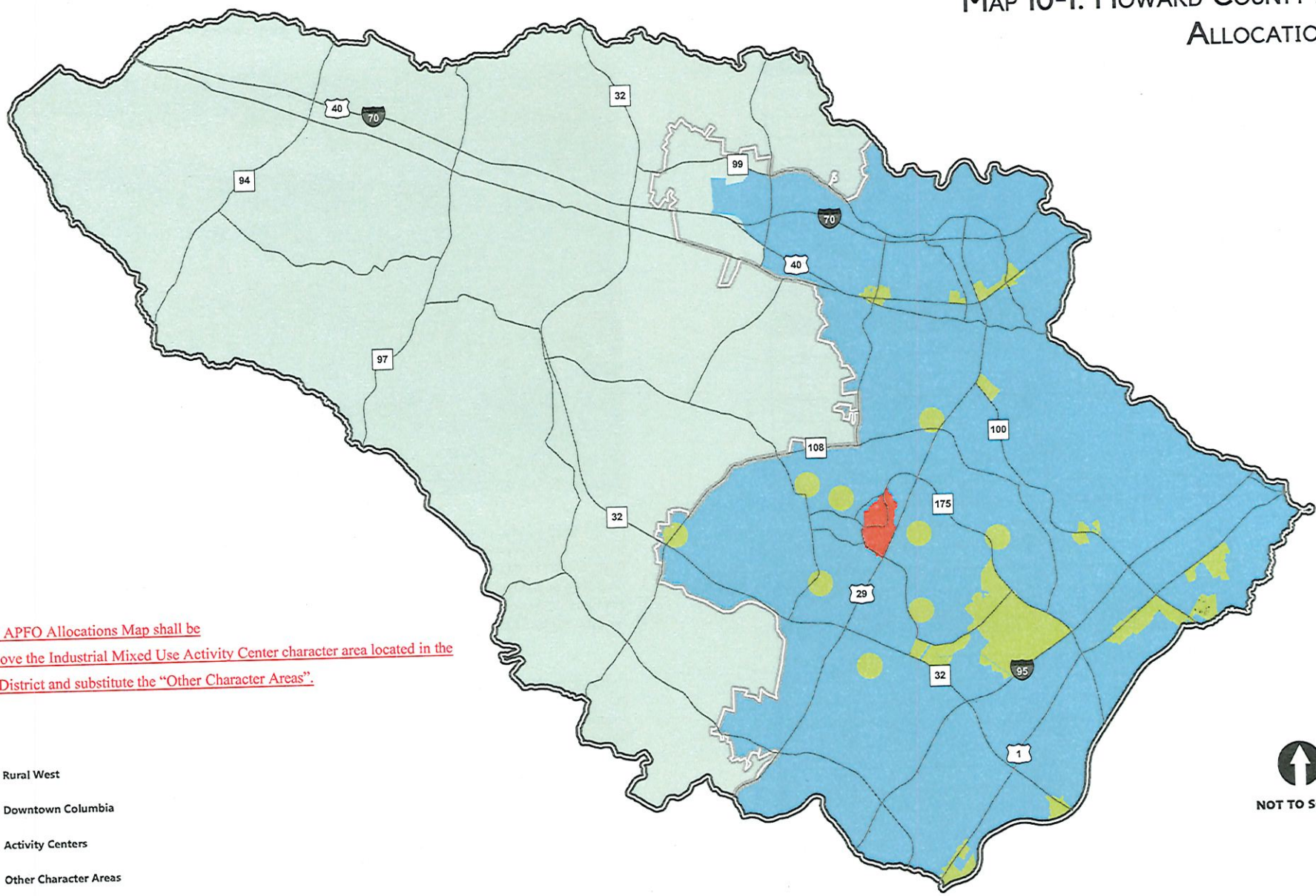
**Table 10-1: Howard County APFO Allocations Chart - HoCo By Design**

Year	Downtown Columbia (1)	Activity Centers	Other Character Areas	Rural West	Total	Green Neighborhood	Affordable Housing (for purchase and rental)
2026	335	600	365	100	1,400	-150	340 300 150
2027	335	600	365	100	1,400	-150	340 300 150
2028	335	600	365	100	1,400	-150	340 300 150
2029	335	600	365	100	1,400	-150	340 300 150
2030	335	600	365	100	1,220	-150	340 300 150
2031	155	600	365	100	1,220	-150	340 300 150
2032	155	600	365	100	1,220	-150	340 300 150
2033	155	600	365	100	1,220	-150	340 300 150
2034	155	600	365	100	1,219	-150	340 300 150
2035	154	600	365	100	1,219	-150	340 300 150
2036	154	600	365	100	1,219	-150	340 300 150
2037	154	600	365	100	1,219	-150	340 300 150
2038	154	600	365	100	1,219	-150	340 300 150
2039	154	600	365	100	1,219	-150	340 300 150
2040	154	600	365	100	1,219	-150	340 300 150
<b>Total</b>	<b>3,219</b>	<b>9,000</b>	<b>5,475</b>	<b>1,500</b>	<b>19,194</b>	<b>2,250</b>	<b>5,100 4,500 2,250</b>
<b>Annual Average</b>	<b>215</b>	<b>600</b>	<b>365</b>	<b>100</b>	<b>1,280</b>	<b>-150</b>	<b>340 300 150</b>

(1) The allocations for Downtown Columbia align with the phasing chart in the approved and adopted 2010 Downtown Columbia Plan.

As indicated earlier, HoCo By Design envisions future development in the Gateway Regional Activity Center. Once a master plan for Gateway is completed, and the number and pacing of residential units for Gateway determined, the allocation chart can be amended to include annual allocations for Gateway or a separate chart for Gateway can be adopted. However, these units are not likely to be built in the near-term, as zoning changes will follow the master plan and units will take several years after zoning to be constructed.

# MAP 10-1: HOWARD COUNTY APFO ALLOCATION MAP



Howard County APFO Allocations Map shall be amended to remove the Industrial Mixed Use Activity Center character area located in the Ridge South District and substitute the "Other Character Areas".

- Rural West
- Downtown Columbia
- Activity Centers
- Other Character Areas
- Planned Service Area

  
 NOT TO SCALE



After a development project receives housing allocations, it then takes the school capacity test. To pass this test, the elementary school district, the elementary school region, the middle school district, and the high school district where the project is located must each be under 105%, 105%, 110%, and 115% local rated capacity utilization, respectively. If school capacity is not available at any level (elementary, middle, or high), then the project is placed on hold. The school capacity test is retaken annually, based on the new school capacity chart approved by the Howard County Board of Education (BOE) and then adopted by the County Council, typically each July. Once the school districts in which the development project is located have adequate capacity, the project can proceed. If not, the project remains on hold for another year. Projects can be held up to a maximum of five tests due to closed schools (generally three to four years). This means that even if the schools still do not have adequate capacity after five tests, the development project may proceed nonetheless. This period, when projects are on hold, allows the Howard County Public School System (HCPSS) to plan, fund, and build new schools and additions. Redistricting may also occur to allow the efficient use of systemwide capacity that may be available. Map 10-2 shows the school districts closed to development as of July 2022.

Table 10-2 shows the number of housing units that have been placed on hold (paused) since APFO was first adopted in 1992. This includes units that have been placed on hold due to a lack of available allocations and units on hold due to school capacity restrictions. (Note that APFO is designed to be forward looking. The allocation year is three years ahead of the time the plan is first submitted to the Department of Planning and Zoning (DPZ) for review, as it typically takes about three years for a plan to move through the development review process and be completely built. Hence, 1995 is the first allocation year.) As indicated in Table 10-2, more than 23,000 housing units have been placed on hold since APFO first began.



**Table 10-2: Total Units on Hold Allocations & School Capacity Waiting Bin**

Allocation Year	Allocations	School Capacity	Total
1995	0	0	0
1996	63	0	63
1997	832	62	894
1998	688	533	1,221
1999	869	0	869
2000	109	0	109
2001	74	51	125
2002	484	154	638
2003	360	0	360
General Plan 2000 Adopted			
Allocation Year	Allocations	School Capacity	Total
2003	461	75	536
2004	497	376	873
2005	654	706	1,360
2006	676	782	1,458
2007	994	966	1,960
2009	1,002	756	1,758
2010	2,925	363	3,288
2011	553	0	553
2012	261	0	261
2013	248	16	264
2014	211	850	1,061
2015	37	13	50
PlanHoward2030 Adopted			
Allocation Year	Allocations	School Capacity	Total
2015	17	151	168
2016	111	60	171
2017	485	182	667
2018	0	509	509
2019	0	851	851
2020	0	804	804
2021	0	662	662
2022	0	411	411
2023	0	533	533
2024	0	736	736
Total Units Paused Since Beginning of APFO			23,358



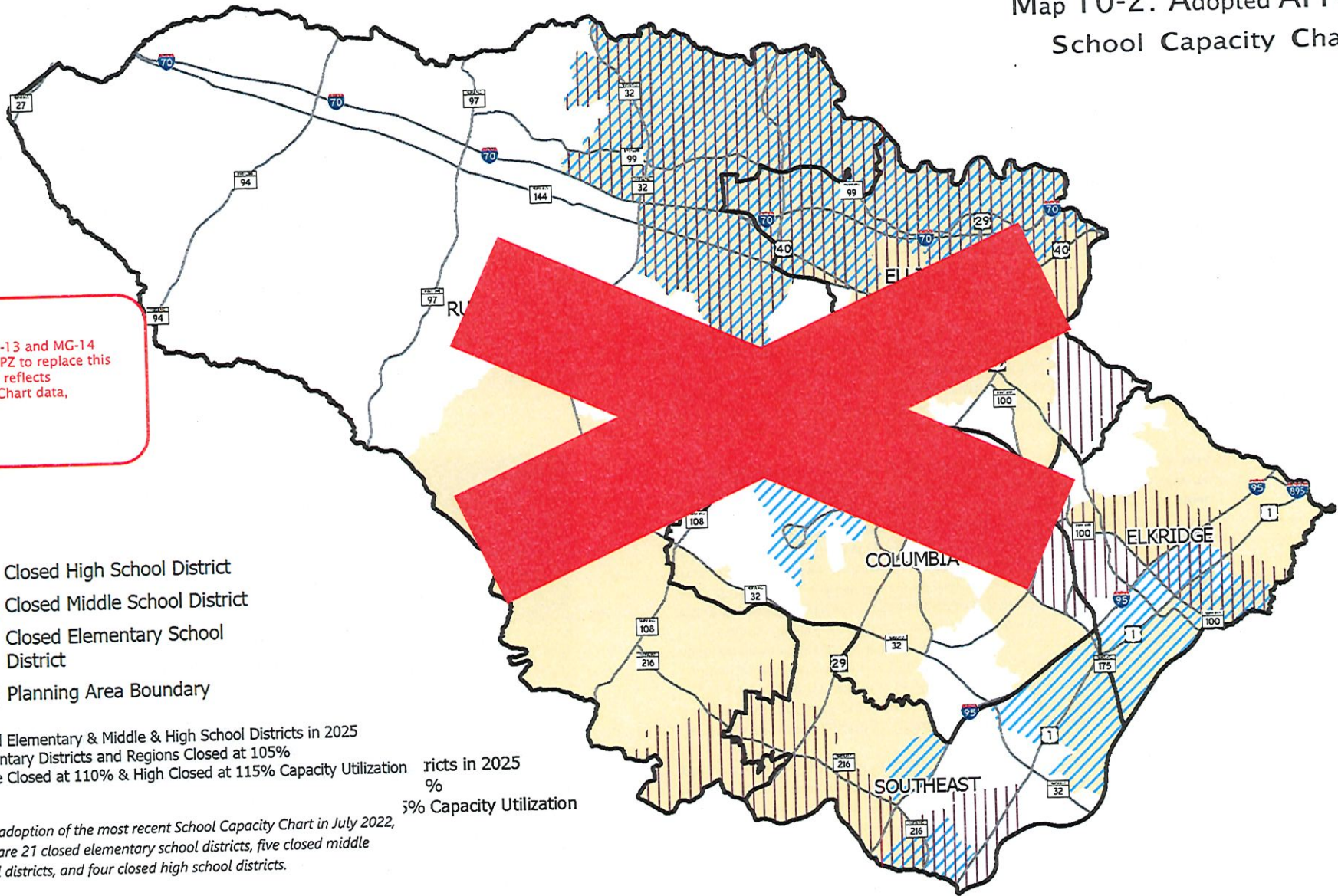
# Map 10-2: Adopted APFO School Capacity Chart

This map on pages MG-13 and MG-14 shall be amended by DPZ to replace this map with a map which reflects 2023 School Capacity Chart data.

- |||| Closed High School District
- //// Closed Middle School District
- Closed Elementary School District
- ▭ Planning Area Boundary

Closed Elementary & Middle & High School Districts in 2025  
 Elementary Districts and Regions Closed at 105% Capacity Utilization  
 Middle Closed at 110% & High Closed at 115% Capacity Utilization

Upon adoption of the most recent School Capacity Chart in July 2022, there are 21 closed elementary school districts, five closed middle school districts, and four closed high school districts.







### Adequate Transportation Facilities

To ensure the adequacy of road capacity in relation to growth, APFO directs residential and commercial development projects to areas where adequate road infrastructure exists to absorb the transportation impacts of the new development—or will exist via mitigation measures the developer will provide. Adequate roads are those that meet, or will meet, minimum county level of service standards. Proposed developments are subject to an adequate transportation facilities test evaluation (roads test) to determine their impact to road infrastructure. Developers submit multi-modal traffic studies as part of the development review process. The Howard County Design Manual (Design Manual) defines the types of studies required to ensure the County has proper information regarding development impacts (in accordance with both APFO and the Complete Streets Policy). Information collected allows the County to require appropriate mitigation measures when needed. The Design Manual describes methods for conducting the following types of multi-modal traffic studies: 1) level of service for motor vehicle traffic; 2) pedestrian access; 3) bicycle level of traffic stress; 4) safety evaluations; 5) parking/access studies; and 6) noise studies. The scope and applicability of each study is determined by the Howard County Department of Public Works in consultation with the Office of Transportation, to guide which studies are completed.

Among these multi-modal traffic studies, the roads test involves evaluation of the development's impact to motor vehicle service levels within a specific radius surrounding the project; the radius varies depending on the location in the County. If the increase of motor vehicle trips from a proposed residential or commercial

development causes the motor vehicle level of service to fall below the county standard, the development will need to: 1) revise the scale and/or type of project to reduce the impact and meet level of service standards; 2) propose a mitigation strategy to alleviate motor vehicle congestion and add capacity, such as road widening and intersection improvements; or 3) make a fee-in-lieu payment. Approved at the County's discretion, the fee-in-lieu payment is a fair-share contribution for larger road infrastructure projects in the County's Capital Improvement Program. The development and approval of all studies, tests, and fees are included as part of the development plan and the developer must mitigate the traffic impact or pay a fee-in-lieu to receive plan approval.

As previously noted, pedestrian access and bicycle level of traffic stress studies are among the multi-modal traffic studies identified in the Design Manual, in accordance with the Complete Streets Policy. Development projects within one-half or one mile of community destinations must submit multi-modal transportation studies. Community destinations can include schools, libraries, parks, Main Street in Elkridge, Main Street in Ellicott City, Route 40 (from the Patapsco River to the interchange with Interstate 70), and any transit oriented developments in the County. The multi-modal studies must map pedestrian and bicycle connections for each of the destinations within the specified distance. The pedestrian connection identified must be suitable for an elementary school-aged child, such as a sidewalk or a 10-foot-wide shared use path with designated street crossings. The study must indicate whether each segment of the pedestrian connection is existing or not. The bicycle connection is based on the bicycle level of traffic stress method, and details which segment meets or does not meet the county standard. While these studies address pedestrian and bicycle travel, the APFO level of service test remains singularly focused on motor vehicle travel. APFO has resulted in automobile capacity mitigation measures that have not always considered impacts to pedestrians and cyclists. While the single-mode level of service approach is still being used in many suburban jurisdictions, there is an increasing shift to consider multiple modes.

As referenced in other sections of HoCo By Design, development patterns are changing as the County evolves from larger, widespread, greenfield development patterns to both smaller-scale projects and concentrated development nodes. The current structure of APFO does not include a mechanism to mitigate the impact of small development projects (those that generate less than five peak hour trips) in a community. Further, APFO only requires a project to mitigate its direct impact on an intersection. APFO does not account for the larger network benefit that could occur at some other location farther from the development.

Some jurisdictions pool funds over time to build more substantial projects that have an overall network benefit and advance multi-modal policy goals. Through this alternate approach, a local area transportation plan can establish projects that will be funded by fees in a specific subarea—offering greater flexibility and the ability to address the transportation system as a whole. Baltimore City and Anne Arundel, Montgomery, and Prince George's Counties administer various models of this approach, including fee-in-lieu programs that are used to fund multi-modal improvements.



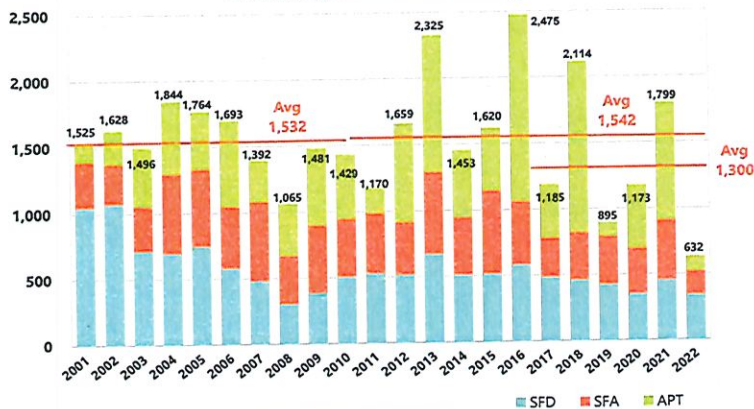
## Residential Growth Trends

While APFO is not perfect, it has succeeded in pacing residential growth according to General Plan projections and goals. Over the last 20 years, there has been an annual average of 1,537 new housing units built in the County. However, of the past six years, the annual average has decreased to 1,300 units a year. *Consequently, a surplus of unused allocations has ensued, resulting in a gradual buildup of available housing allocations in recent years.* Graph 10-1 shows building permits issued since 2001 and reflects the decline in residential construction in recent years. Graph 10-1 also shows development by unit type. The years with the greatest housing growth are attributed to large numbers of multi-family units coming on-line, typically associated with large apartment projects in Downtown Columbia and the Transit Oriented Development (TOD) and Corridor Activity Center (CAC) zones along the Route 1 Corridor. As further depicted in Graph 10-2, in more recent years a greater number of apartment units have been built with less single-family detached and single-family attached units built.

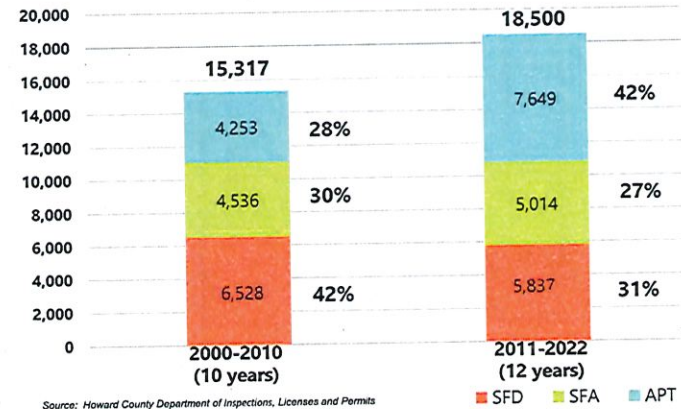
The surplus in allocations may be attributed in part to APFO amendments adopted in early 2018, which have resulted in more school districts being closed to development, as reflected in Map 10-2. A significant change to the law included lowering the capacity utilization percentages when elementary districts and regions are closed to development from 115% to 105% and middle school districts from 115% to 110%, and adding a high school district test at a 115% threshold. This change has had an impact on proposed new residential development, given the extent of the closed areas in the County.

This recent trend of slower residential development is also a result of a limited land supply in Howard County. Much of the new residential development opportunities in the future in Howard County will come from redevelopment, as reflected in the Future Land Use Map.

**Graph 10-1: Residential Building Permits Issued 2001 through 2022 Howard County**



**Graph 10-2: Residential Building Permits Issued - By Unit Type Howard County**





Leading Indicators of Future Development Activity

New residential construction is expected to continue to slow in Howard County in the immediate years ahead. The following leading indicators show current residential construction trends holding steady over the next three to five years.

APFO Allocations

APFO allocations provide an indication of near-term residential building activity since they are issued three years in advance. Table 10-3 shows the allocations granted since the 2010 allocation year for Downtown Columbia (a major redevelopment location in Howard County with separate APFO requirements) and the rest of Howard County. In general, the number of allocations granted has slowed in more recent years, and this slower pace is expected to occur in the years ahead given limited land supply for new residential construction.

Presubmission Community Meetings

Another important leading indicator of future development activity is the number of presubmission community meetings held. Presubmission community meetings are required for all new development in Howard County. These meetings are held by the project applicant to inform the community that they intend to submit a development plan to the Department of Planning and Zoning (DPZ) for review. Once the meetings are held, the applicant has up to a year to submit their plans to DPZ.

Since July 2019, when the reduced capacity utilizations for elementary and middle schools, and the new high school test became effective, the number of presubmission community meetings and total units for new residential development have dropped significantly. Graphs 10-3 and 10-4 summarize this reduction. Similar to the trend of less allocations being granted, the slowing number and amount of units proposed in presubmission community meetings is also an indication that new residential construction will continue to slow in the immediate years ahead. While this slowdown will impact the amount of

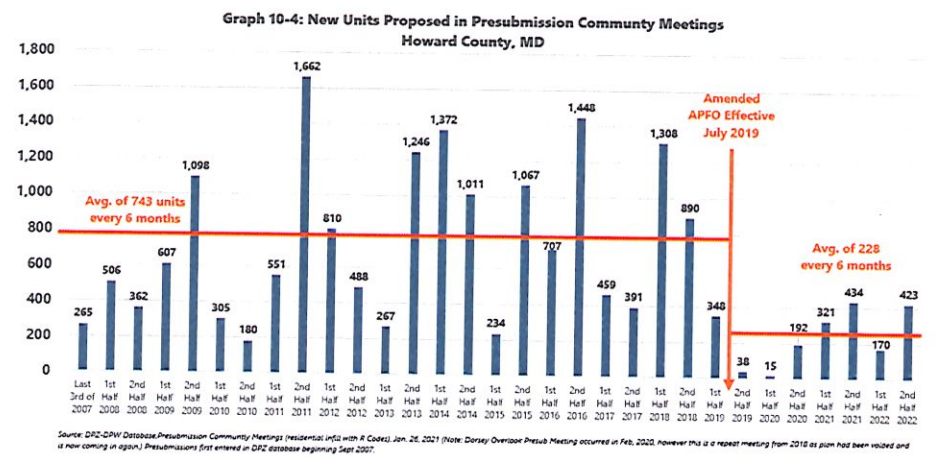
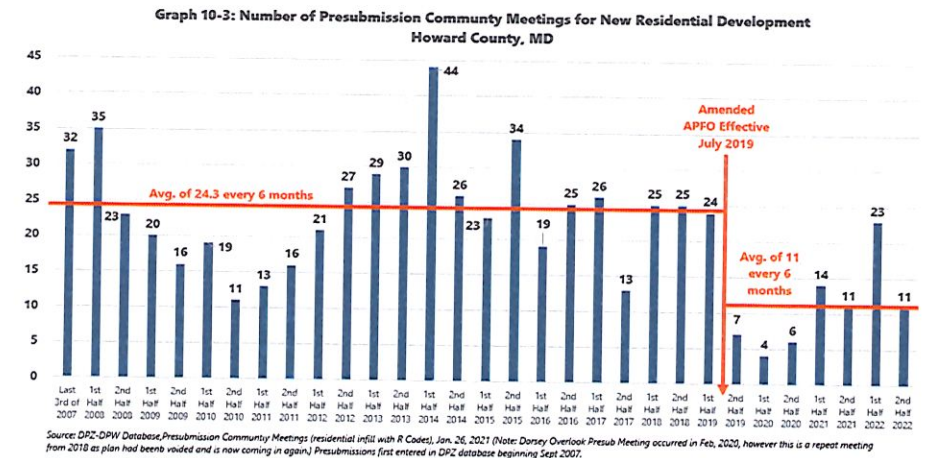
**Table 10-3: Tentative Allocations Granted Since 2010 Allocation Year**

Year	Total	Downtown Columbia	Rest of Howard County
2010	1,051	0	1,051
2011	1,275	0	1,275
2012	989	0	989
2013	1,980	390	1,590
2014	1,685	0	1,685
2015	1,885	267	1,618
2016	1,510	160	1,350
2017	1,616	0	1,616
2018	2,124	300	1,824
2019	2,167	509	1,658
2020	1,183	205	978
2021	922	13	909
2022	165	0	165
2023	<del>558</del>	36	522
2024	<del>1375</del>	675	700
2025	826	470	356
2026	359	327	32
2027	327	327	0
2028	677	677	0
2029	0	0	0
2030	254	254	0

**Current Allocation Year**  
**Future Allocation Years**

revenue generated for school infrastructure, it will give HCPSS some time to build new capacity in the areas of the County where needed.

The HoCo By Design housing allocation chart reflects these slowing residential development trends resulting from the lack of available land and the change in unit types. Accordingly, the allocation chart establishes a moderately slower pace of growth to 2040, with most units to be built in Downtown Columbia and other Activity Centers. This pace of growth allows for continued fiscal stability and sustainability of service levels, and considers the need to ensure housing supply meets demand.





## Managing Growth into the Future

HoCo By Design recommends a comprehensive review and assessment of APFO. Future land use patterns in Howard County will largely be realized through infill development and redevelopment in activity centers, and to a much lesser extent by suburban development in greenfields. APFO was designed to manage growth in the latter, and now needs to be updated to reflect the land use patterns of the County's future.

Section 16.1100(b)(iv) of the Howard County Subdivision and Land Development Regulations requires that a task force be convened within one year of the adoption of the General Plan to review and recommend changes to APFO. The APFO task force will be responsible for reviewing and updating APFO to support the vision, policies, and implementing actions presented in this Plan. The task force may research alternate APFO models used in other counties in Maryland, particularly those counties where redevelopment and infill are the primary forms of new development.

The task force should also explore regulations that consider various development types, locations, and intensities, and incentive-based provisions to expedite capacity improvements. For example, the APFO review should determine whether higher-density, mixed-use projects in activity centers, which may have low student yields, should meet different standards or thresholds, and whether pay-based incentives should be established where suburban-style developments could proceed if a higher school surcharge were paid. The task force should evaluate how APFO may apply to detached accessory dwelling units.

Not only are development and zoning incentives a vital part of a comprehensive affordable housing strategy, process incentives like APFO should be considered as well. The Dynamic Neighborhoods chapter suggests that the APFO task force assess the applicability of APFO to accessory dwelling units and develop recommendations as applicable. The Housing Opportunities Master Plan also recommends the APFO task force look for opportunities to grant automatic or limited exemptions to incentivize affordable, age-restricted, and missing middle housing developments. Accordingly, the County should evaluate targeted changes to APFO to support the growth required to improve housing affordability and opportunities when the APFO task force convenes following the adoption of the General Plan.

*The allocation chart presented here is intended to serve as a temporary bridge between the current requirements of APFO and any subsequent revisions to the law that may result from the work of the APFO task force. The task force should consider whether the allocation chart achieves its intended goal and, if so, whether changes to the chart should be made. The task force should also advise whether the allocation chart, if still deemed necessary, should remain in the General Plan or be incorporated into the APFO ordinance.*

The task force should also evaluate existing conditions and emerging trends for new student generation, whether it is due primarily to new housing units or family turnover in existing neighborhoods. Developing an understanding of neighborhood lifecycles will allow for a better assessment of student growth and housing. This understanding should further inform how the APFO school capacity test and associated chart could be changed to optimize growth targets while also maintaining adequate school capacity. *The allocation chart presented here provides guidance for future considerations.*

Ultimately, the challenge will be to better balance housing market demand, economic development, and fiscal goals with the continued need to provide adequate school capacity and transportation facilities, as changing housing types and patterns emerge in the future. As noted in the Growth and Conservation Framework chapter, HoCo By Design provides a more predictable outlook for infrastructure with its focused approach on redevelopment—as only 2% of the County's already developed land is targeted as activity centers. This approach allows the County and allied agencies to more deliberately plan and budget for infrastructure.

### MG-1 Policy Statement

Evaluate and amend the Adequate Public Facilities Ordinance (APFO) to support the vision and policies presented in HoCo By Design, including current and anticipated development patterns and challenges, to support the vision and policies presented in HoCo By Design and in accordance with the law established for the review of APFO.

### Implementing Actions

- As part of the evaluation of APFO, achieve the following:
  - Research APFO models used in other Maryland and US jurisdictions that account for infill development and redevelopment to support future growth and transportation patterns as anticipated in this General Plan.
  - Assess the applicability of APFO to accessory dwelling units and develop recommendations as applicable.
  - Establish a working group that evaluates and sets goals for the targeted incentive program for affordable and accessible housing and establish criteria for the Affordable Housing set aside in the APFO Allocations Chart.
  - ~~Evaluate opportunities to grant automatic or limited exemptions to incentivize affordable, age-restricted, and missing middle housing developments.~~
  - ~~Evaluate the necessity of a housing allocation chart, including its goals, design, and appropriate place in the law.~~
  - Seek to engage local & national experts who can advise on modern best practices for managing growth and infrastructure.
  - Schools:
    - Collect data for school demands in the County sufficient to evaluate existing conditions, emerging trends, and future year needs. This analysis should include an evaluation of the life cycle of new and existing neighborhoods to better understand the origins of student growth.
    - Evaluate the extent to which new growth generates revenues to pay for school infrastructure and review alternative financing methods.
    - Evaluate the school capacity test in APFO to determine if intended outcomes are being achieved, and recommend changes to the framework and process to better pace development with available student capacity.
    - ~~Examine alternatives to APFO waiting periods whereby a development proposal offsets the potential impact to zoned schools through an additional voluntary mitigation payment.~~
    - Evaluate the timing and process of the school allocation chart.
    - Evaluate student generation yield by housing unit type to develop student generation yield. Review results with comparable counties to understand regional trends.
    - Explore unit type ratios or unit type mixes that would support housing goals without overburdening schools and propose appropriate waiting periods in relation to unit type.
  - Transportation:
    - Evaluate and amend APFO standards for transportation adequacy and develop context-driven transportation adequacy measures that align with the County's land use and transportation safety vision.
    - Study and develop APFO standards for specific geographic subareas.
    - ~~Study and develop methods to use a fee-based approach to advance the most significant projects in a subarea.~~
    - ~~Evaluate and amend APFO standards to mitigate trips with investments in bicycle, pedestrian, and transit infrastructure, road connectivity, and safety projects.~~
    - Establish a working group (consisting of members appointed by the County Council and the County Executive) that evaluates and recommends goals and criteria for the targeted incentive program for affordable and accessible housing and the Affordable Housing set aside in the APFO Allocations Chart.
- Appoint an APFO task force within one year ~~six months one year~~ of General Plan adoption to review and provide recommendations for APFO updates that reflect the vision and policies in HoCo By Design.