



MONTGOMERY COUNTY COUNCIL
ROCKVILLE, MARYLAND

MARC ELRICH
COUNCILMEMBER AT-LARGE

November 3, 2016

Dear Colleagues:

I am concerned that the Subdivision Staging Policy does not accomplish its goal – which is to insure that appropriate infrastructure is in place in advance of or congruent with future development.

The only way to begin to alleviate the congestion – throughout the county, not just in “red” areas – is to change the mode share split for peak hours travel. We need more people to leave their cars at home and use public transit (and bike and walk when possible). We know what we need to achieve this objective:

1. Sufficient transit that covers the county
2. Sufficient incentives for more people to use transit, bike and walk - a comprehensive parking policy.

We see everyday that people endure enormous congestion in their cars because they do not feel (or do not have) any viable alternatives that are reliable and efficient. If people are going to be stuck in unreliable transportation, they would rather be in their own cars. It is up to us to give them the alternatives. The Subdivison Staging Policy (which should revert to its former name, Growth Policy) should “prescribe the contributions necessary...to ensure that infrastructure keeps pace with new development.” (SSP, PB draft, July 2016, page 4).

There are potential solutions, including corridor development districts that could include existing commercial and future commercial and residential developments. The rates in those districts could be set to raise funds to provide transit, bike and pedestrian infrastructure, and once developed, they could replace other taxes, including transportation impact taxes. We will not be able to develop and resolve sufficient solutions today. The work being done on the comprehensive LATR is promising, but it is currently incomplete and not yet presented to the Council (for example, it does not include any funding for BRT or other transit initiatives; its solutions appear to be relatively limited even though the area included is more comprehensive).

I am concerned that we risk passing legislation that would eliminate any links to mitigation for transportation problems. That is, developers will be able to pay a certain amount of money, and they will be allowed to develop. No remedies for the additional congestion will be required.

In addition to my overall concerns about the SSP, I would also like to list some specific concerns.

CLV: As I outlined in my memo (circles 25-26 in memo from 11/1/16) and as documented by Brian Krantz, CLV should not be used. It is not an appropriate measure.

“The essential problem with CLV is that it considers only one intersection and does not account for interactions with other intersections. Thus if an intersection has a capacity of, for example, 2500 vehicles per hour but due to congestion in surrounding areas only processes 1500 vehicles per hour, the intersection will be performing great according to CLV. Essentially CLV does not take into account queues and surrounding backups.”

Fred Ducca, Director, Transportation Policy Research Group, National Center for Smart Growth Research and Education

VMT is also an inadequate measure, and should not be used unless coupled with other related information – hours of delay. In fact, the peer review solicited by the Planning Board recommended using VMT and Person Hours of Travel (PHT). (pg. 5 SSP Appendix) Additionally, at the most recent Transportation Planning Board (TPB) meeting, the information presented showed that VMT/capita was down 2% but vehicle hours of delay will grow by 47%. (Source: Item 9, TPB, October 19, 2016)

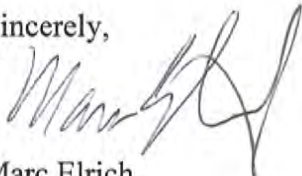
NADMS is insufficiently explored. It is unclear the size of the data for the individual policy areas used by Planning Board from the Census. The information collection by MC DOT in the TMD areas is not comprehensive and does not include residences.

Trip Generation Rates. While I support the concept of moving to people, rather than vehicle, trips, we do not know the impact of the change. According to calculations by Brian Krantz, using the new ITE rates will dramatically increase the threshold for townhouses in the North Bethesda area. We should not be changing the calculations until we know what it does even if the principle makes sense.

In light of everything above, the information from my memo and other information, I propose the following:

Leave the current SSP in place for 9 months while we review a policy, perhaps Comprehensive LATR plus development districts, that will achieve the purpose of planning for and providing the necessary transportation infrastructure that will allow more residents to leave their cars at home and travel by other means.

Sincerely,



Marc Elrich

Impact of ITE Trip Generation Rates

Because I do have access to some of the ITE rates, I compared the maximum number of dwelling units that can be built in **North Bethesda** under the 2016 Recommendations versus the 2012 SSP before an Impact Study is Triggered

Dwelling Type	2012-2016 SSP			2016-2020 SSP		
	Traffic	Transit	Bike/Ped	Traffic	Transit	Bike/Ped
Single Family Detached	26	N/A		31	392	514
Townhouses	35	N/A	N/A	61	771	1007
Apartments (Code 222)	64	N/A		80	1004	1310

Nearly 75% increase in Townhouses

Even in non-MSPAs, Adequacy Constraints Are Being Eased in the 2016 SSP

From Brian Krantz to accompany "Impact of ITE Trip Generation Rates":

Below walks you through it for the North Bethesda policy area for Townhouses.

- 1) The Townhouse ITE rate for PM is 0.52 peak hour trips/unit
- 2) The "residential adjustment" for North Bethesda is 83% (0.83)
- 3) As an example, for 50 Townhouses, the number of adjusted ITE trips is $50 \times 0.52 \times 0.83$ or **21.6** trips
- 4) The 21.6 becomes the number of vehicle trips under the policy, but the threshold is based on **person** trips. Using the mode-split from the appendix, the breakdown for North Bethesda is 53.8%, 25.9%, 8%, 12.3% for Auto Driver, Auto Passenger, Transit and Non-motorized, respectively. So, if vehicle trips is 21.6, these become:
 - a. Auto Driver: 21.6
 - b. Auto Pass: 10.4
 - c. Transit: 3.2
 - d. Non-Motor: 4.9(a total of 40.1 person trips). This is less than the 50-person trip threshold, so it would not trigger a study.
- 5) It turns out that the answer is 62 townhouses, resulting in (via the same method):
 - a. Auto Driver: 26.8
 - b. Auto Pass: 12.9
 - c. Transit: 4.0
 - d. Non-Motor: 6.1For a total of 49.7 person trips (63 puts you over 50.0)