

Memorandum

To: TISTWG Members
From: Dan Hardy
Date: January 4, 2015
RE: LATR CONCEPT SHEETS AND DECEMBER 3 MEETING COMMENTS













This memorandum summarizes the comments made on the boards themselves during our December 3 TISTWG meeting, including placement of dots by folks at the meeting:

The first four pages summarize the dot-placement and comments received at the December 3 meeting boards (essentially the same material sent via e-mail 12/23 with a few minor amendments based on comments received through 12/31).

The remaining pages summarize the proposed responses to the individual comments received.

Dan

Key to dots for all boards:


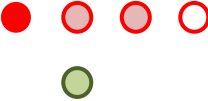
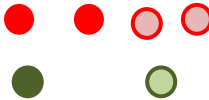


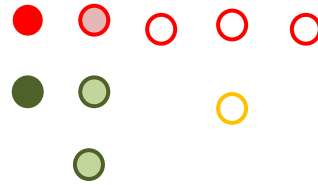
	Agency	Civic	Development Community	Guest
Very good idea				
Good idea				
Warrants further consideration				







Scoping Elements (Board #1)

	Dots	Comments
<u>Study Approaches (starting on page 7)</u>		
SA-1. Alternative Review Procedure – Metro Station Policy Areas TMAg (no change)		No longer relevant within the White Flint Sector Plan due to special impact tax TMAGs must include penalties if they are not fulfilled Weak in current condition – not good when expired Need a better tie to impact tax spending Expand to other areas – BRT
SA-2. Alternative Review Procedure – White Flint (no change)		Might only apply to this particular case
<u>Study Triggers (starting on page 11)</u>		
ST-1. Trip Generation Threshold		If below threshold – still pay into a sidewalk fund or similar May be tough politically Tripgen matters But we are saying we will tolerate more congestion How do we address the cumulative impacts over time? Must acknowledge this is still a LOS/congestion based measure Must address – threshold, rate, context Any benefit for presence of BRT should not apply to suburban and rural policy areas
ST-2. Study Area		Site proportion of traffic could disincentivize development on 2 lane streets Study area changes – based on context Seven intersections/rings too big for LATR
ST-3. Background Traffic		Can't ignore background traffic – better pipeline project management APFO validity timeframes make pipeline difficult to manage
ST-4. Modal Analysis Triggers		Weighting modes differently – why? Make sure the trigger first is for auto Locating bikeshare within ¼ mile doesn't make sense Multiple triggers Different triggers by Policy Area Required in CBD Sector Plans and




		<p>in the CR Zones</p> <p>Use a transect zone concept for both land use and transportation network</p> <p>Require only in CBD/MSPA/LRT station areas</p>
Study Refinements (starting on page 24)		
SR-1. Potomac Two-Lane Policy (no change)		
SR-2, Exempt Second Improvement Mitigating < 5 CLV (no change)		
SR-3. Protected Intersections		<p>Protected intersections and areas</p> <p>Process needed to identify intersections</p> <p>Don't give up – look at alternative solutions</p> <p>In CBD areas OK – further out not so good</p> <p>Good idea!</p>
SR-4. Non-Transportation-Related Policies (no change)		

Analysis Elements (Board #2)

	Dots	Comments
<u>Approach (starting on page 30)</u>		
AA-1. Priority of mitigation approach		In past a lot of work for little credit Duration + enforcement of TMAgs
<u>Measurements: (starting on page 32)</u>		
AM-1. Pedestrian System Measurement		Should be strengthened in CBD/MSPA/LRT/BRT areas Accessibility should be measured in travel time, not distance (signals cause delay) Capture quality of ped environment Add WMATA list/process for on-site access improvement needs Analysis should be on whether trip can be made, not on the volume/demand
AM-2. Bicycle System Measurement		Should be strengthened in CBD/MSPA/LRT/BRT areas Include topography Should be County responsibility to define and provide metrics Analysis should be on whether trip can be made, not on the volume/demand Bikeshare should be consideration
AM-3. Transit System Measurement		Should be County responsibility to define and provide metrics Emphasis on transit facility size Emphasis on ped access and quality of bus stops Purchasing a bus is expensive – a common fund or escrow account payment is better
AM-4. CLV Thresholds (no change)		Eliminate CLV thresholds in four CBDS Different CLV for LRT, programmed BRT Not all Metro stations are alike - not all should have 1800 CLV (ex. Shady Grove should be lower) Base threshold on building location, not intersection location
AM-5. CLV/HCM Thresholds		Rename Mobility Assessment Report Do the simulation – HCM+CLV are not enough Operational, not planning – Hard to explain to public Should County maintain Synchro files?

Solutions: (starting on page 48)		
AS-1. CLV mitigation requirement (100% or 150%) (no change)		
AS-2. \$12K per trip (no change)		What is the \$ amount now? What if an option exists for a developer to pay >\$12K/trip, could they instead pay \$12K/trip and skip out of that higher amount? Less critical for large developments as this \$12K/trip is capped, but notable for smaller developments
AS-3. Ped-bike gap contribution	    	Recommend prioritizing this in urban/CBD/MSPA areas Prioritize bike/ped crossing improvements Provide table of what gaps in sidewalk developer must fill rather than requiring analysis

Elements proposed to be dropped (Board #3)

	Dots	Comments
D-1. VMT based standards/thresholds		Apply for MSPAs/urban areas only – could be use specific
D-2. Connectivity indices (as standalone – may be part of bike/ped accessibility)		
D-3. Screenlines/cordon lines with person-throughput		
D-4. Traffic Mitigation Goals under SSP APF2		Legally in code – cannot change without Council action. Change APF at building permit to be the “regular” test
D-5. Areawide trip caps or parking caps (with or without trading)	 	Deserves some discussion – federal facilities have caps. In CR zone and new zoning code rewrite Check downtown Boston and Cambridge for examples Appropriate planning tool but not associated with APF level of service

Other Issues (Board #4 – no facilitated group discussion)

O-1. Ensuring a balanced approach (i.e., test/tweak each concept so that a bunch of new rules aren’t death by a thousand cuts)		
O-2. Effect on review processes/schedules by multiple agencies		Remove staging ceiling for Great Seneca Science Corridor Plan Area
O-3. Defining area types (are BRT stations all urban areas?) in subsequent SSP Council actions		Allow for more density in CBD/MSPA/LRT station areas
O-4. Reflecting flexibility for evolution in land use-types over time (i.e., the millennials argument)		
O-5. “Free rider” issues – new rules exacerbate the problem, but are there improvements to status quo?		Impact tax helps address
O-6. Defining peak periods for different modes (particularly midday pedestrian flows)		
Others to be added by meeting participants.		

SUMMARY TABLE OF PROPOSED RESPONSES TO DETAILED COMMENTS

Note: Action items identified by green shading in response box with additional detail provided in the TISTWG_Memo_010415.PDF file.

Topic/ Comment #	Comment	Source	Response
	SA-1: Metro Station Policy Areas TMAg		
SA-1/1	No longer relevant within the White Flint Sector Plan due to special impact tax	12/3 meeting board	LCOR project TMAg still applies but might be subject to renegotiation. Could still be applied to a residential project not subject to the Special Taxing District. Therefore; no need to prohibit its applicability in White Flint.
SA-1/2	TMAgs must include penalties if they are not fulfilled	12/3 meeting board	See response to SA-1/6
SA-1/3	Weak in current condition – not good when expired	12/3 meeting board	See response to SA-1/6
SA-1/4	Need a better tie to impact tax spending	12/3 meeting board	See response to SA-1/6
SA-1/5	Expand to other areas – BRT	12/3 meeting board	Appropriate once new BRT station areas are defined; this Subdivision Staging Policy proposes to establish that concept to facilitate future placetype evolution.
SA-1/6	TMAgs, in their present form, are limited in their effectiveness due to several significant limitations: <u>Limited duration (typically 12 years)</u> . What happens to incentives & services beyond that timespan, or how are subsequent increases in vehicular traffic handled? We recommend that that these agreements have much larger durations or that they be tied to accomplishment of certain goals for several consecutive years. <u>Limited enforcement</u> . If a developer fails at their TMAg	MCDOT, 12/5	The concerns about TMAgs are apt; we will pursue approaches for strengthening language both in the Subdivision Staging Policy (and in Section 42A of the County Code) for this LATR Concept. Some of these approaches may be appropriate for other “hard” or “soft”

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	<p>obligations, there are very few effective “sticks” that can be applied, and very limited legal enforcement mechanisms or penalties.</p> <p><u>Limited transferability.</u> TMAgs should have the ability to be enforced if the developer changes jurisdiction, as in the case of annexation by a municipality.</p>		<p>TMAgs beyond Concept SA-1. Many approaches are already under the purview of the Planning Board and Executive Branch. Given the complexity of potential approaches and stakeholder interests, we suggest more widespread changes to all TMAg processes should not be part of the current Subdivision Staging Policy assessment. Rather, changes to only SA-1 could provide a springboard for further TMAg process discussions in other regulatory venues.</p>
SA-1/7	<p>Be careful with this option’s relationship with the Transportation Impact Tax as there are many land uses that do not pay Impact Taxes, and yet they contribute to the general congestion and use of other transportation resources</p>	MCDOT, 12/5	<p>No changes are proposed to this existing LATR concept.</p>
SA-2: White Flint Special Taxing District			
SA-2/1	<p>Might only apply to this particular (White Flint Special Taxing District) case</p>	12/3 meeting board	<p>Agreed – no changes to existing LATR concept proposed.</p>
SA-2/2	<p>This policy is still being actively implemented, and it is still too early to determine whether it is felt to be a success. At this time it feels like this mechanism may be best left to individual master plans rather than consideration in the countywide LATR.</p>	MCDOT, 12/5	<p>Agreed – no changes to White Flint are proposed, although precedents set by Pro-Rata Share concepts existing White Flint or contemplated in White Oak under Subdivision Staging Policy Amendment #14-02 will be germane to the feasibility of developing similar approaches in other areas over time.</p>
SA-2/3	<p>A concern with White Flint (apart from whether acquired revenue will be adequate to fund necessary infrastructure) is that new developments still impact areas outside the policy area that are subject to LATR and TPAR. This is particularly important as</p>	MCDOT, 12/5	<p>The degree to which a new Pro-Rata Share approach addresses impact mitigation beyond its application area is an element for discussion in establishing</p>

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	intersections along the periphery of urban areas tend to be where congestion is most notable, as traffic is metered at those points upon entering the urban area.		the policy for any given area.
SA-2/4	This does prompt some other ideas not explicitly limited to White Flint: Value Capture concepts are worth consideration, particularly where major capital investments are needed that are likely to create a large increase in land values. Options might focus on taxing forecast value gains to pay for infrastructure up front (risk primarily on developers), or taxing actual realized value gains to pay off bonds after a project is built (risk primarily on the public).	MCDOT, 12/5	Agreed – but expected to be beyond the scope of this year’s Subdivision Staging Policy.
ST-1: Trip Generation Threshold			
ST-1/1	If below threshold, still pay into a sidewalk fund or similar fund	12/3 meeting board	To be investigated. May be appropriate if part of a Pro-Rata Share approach with identified projects not duplicative of TPAR or impact taxes. Otherwise can be achieved other mechanisms including Urban Districts and impact tax funds.
ST-1/2	May be tough politically	12/3 meeting board	Agreed. Requires branding of “manage the dollars and the pennies will take care of themselves” approach
ST-1/3	Tripgen matters	12/3 meeting board	Agreed.
ST-1/4	But we are saying we will tolerate more congestion	12/3 meeting board	Not necessarily. The overarching concept is to allow smaller projects to proceed to streamline infill investment, but to increase the multimodal analysis required of larger projects (including traffic operations that will better address actual congestion).

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ST-1/5	How do we address the cumulative impacts over time?	12/3 meeting board	Updated “existing” traffic counts account for cumulative effects over time; not only for approved / occupied pipeline development, but also for effects of more distant land development projects and transportation system changes.
ST-1/6	Must acknowledge this is still a LOS/congestion based measure	12/3 meeting board	Not necessarily. By shifting to person-trip generation rates, the focus is no longer on auto congestion/LOS. It does remain a quantitative trigger rather than a qualitative trigger, which we believe remains appropriate (e.g., we do not propose different LATR triggers for desired development types such as affordable housing)
ST-1/7	Must address – threshold, rate, context	12/3 meeting board	More examination / presentation to be pursued; starting with 1/7/15 TISTWG discussion on Balancing Multimodal Placemaking Objectives.
ST-1/8	Any benefit for presence of BRT should not apply to suburban and rural policy areas	12/3 meeting board	See response to ST-1/7.
ST-1/9	Any increases in trip generation thresholds will inherently result in both a higher level of congestion, and a decrease in transportation projects & funding from the private sector.	MCDOT, 12/5	See response to ST-1/4
ST-1/10	Might increases in the <i>de minimis</i> threshold be accompanied by another gain that would serve the public interest, such as something promoting non-auto modes, a TMAg, etc.? [noting that such costs might exceed the costs of just going the route of LATR, or they may have been otherwise required, anyway]	MCDOT, 12/5	See response to ST-1/1.
ST-1/11	Regarding the bullet reading “Adjacent intersections within CBDs tend to operate well below the congestion standards”, as noted in the previous section regarding White Flint: this tends to partly be a	MCDOT, 12/5	This concern can be addressed by the application of operational analyses under LATR Concept AM-5.

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	result of metering at signals entering into the CBD.		
	ST-2: Study Area		
ST-2/1	Site proportion of traffic could disincentivize development on 2 lane streets	12/3 meeting board	
ST-2/2	Study area changes – based on context	12/3 meeting board	To be considered based on discussion on balancing placemaking objectives
ST-2/3	Seven intersections/rings too big for LATR	12/3 meeting board	Objective of proposed vehicle trip distribution screening process is to reduce analytic burden; seven intersections may still be appropriate in one or more directions, but only if application is large enough to warrant; in most cases seven intersections would not be studied in all directions even for the largest development proposals.
ST-2/4	Regarding the proposed intersection exclusion where site-generated volume is less than 1% of actual volume. We suggest instead that a lower threshold be used (0.5%?) or even better just a number of trips. But in any case it should be applied to trips that are part of the critical movements, not all trips entering an intersection.	MCDOT, 12/5	To be tested with sample projects. Concern about critical movements in lieu of total volume is that it requires more calculation/checking; testing will determine whether this difference is likely to be significant.
ST-2/5	Regarding the proposed intersection exclusion where site-generated volume is less than 5% of total site generated traffic, consider a maximum limitation on how this exclusion may be applied. For example, for a development generating 2000 trips: 5% would be 100 trips, which could be a substantial number at some intersections (particularly if a new or critical movement, per the preceding comment). So, this percentage is too high and should be significantly reduced. As in the previous case, we suggest the use of a number of trips, not a percentage.	MCDOT, 12/5	To be tested with sample projects.

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ST-3: Background Traffic			
ST-3/1	Can't ignore background traffic – better pipeline project management	12/3 meeting board	Consider LATR study documentation to address concerns on pipeline project management.
ST-3/2	APFO validity timeframes make pipeline difficult to manage	12/3 meeting board	“De-vesting” pipeline projects has been periodically proposed; value to those vested remains significant; recession even prompted APF extensions. Pipeline capacity trading is an option that was explored (as proposed TP-5) in the 2009 Growth Policy and reconsidered by the Planning Board in 2012, but at a time when TPAR was too new to vet the proposal.
ST-3/3	Buildings that are built but unoccupied are not currently included in LATR analyses. It was noted in the 12/3 discussion that the LCOR development is built (hence removed from background traffic) but has a high vacancy rate (hence not being captured in existing traffic). The “occupancy” of “vacancy” rates are captured by the traffic counts used in the analysis. Occupancy and vacancy rates are temporary in nature. The process must deal with the long term effects, not just in the temporary condition at any one point in time	MCDOT, 12/5	Consider proposed approach to define when building or area vacancy rates are high enough to warrant inclusion of “re-occupancy” as part of an increase to existing traffic volumes.
ST-4: Modal Analysis Triggers			
ST-4/1	Weighting modes differently – why?	12/3 meeting board	The proposed number of trips for each mode is based on an estimate – primarily informed by experiences in other jurisdictions – of an appropriate threshold where both the significance of modal demand, the production/review effort of specific modal analyses, and the

Topic/ Comment #	Comment	Source	Response
			likelihood of meaningful modal responses is warranted. The thresholds for each mode are unrelated to each other.
ST-4/2	Make sure the trigger first is for auto	12/3 meeting board	The proposed approach starts with person trips and applies individual modal thresholds. See example added to 1/4/15 LATR Concepts memorandum.
ST-4/3	Locating bikeshare within ¼ mile doesn't make sense	12/3 meeting board	Further consideration needed; the concern is that bicycle mode shares are so low that a bike-mode analysis needs another basis (or should be combined with a pedestrian analysis). See threshold analysis example added to 1/4/15 LATR Concepts memorandum.
ST-4/4	Multiple triggers	12/3 meeting board	Agreed – see threshold analysis example added to 1/4/15 LATR Concepts memorandum.
ST-4/5	Different triggers by Policy Area	12/3 meeting board	To be considered based on discussion on balancing placemaking objectives
ST-4/6	Required in CBD Sector Plans and in the CR Zones	12/3 meeting board	Proposed concept would apply Countywide, but transit, bike, and pedestrian analyses would typically only be triggered by medium to large development proposals in more urban areas. Defining thresholds numerically rather than by geographic area actually increases context-sensitivity; see threshold analysis example added to 1/4/15 LATR Concepts memorandum.
ST-4/7	Use a transect zone concept for both land use and transportation network	12/3 meeting board	See response to ST-4/6
ST-4/8	Require only in CBD/MSPA/LRT station areas	12/3 meeting	See response to ST-4/6

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		board	
ST-4/9	In general, additional data & analysis is a positive for the public in that it enables a more informed response. However, such mode-specific analyses can increase the complexity of studies, reducing predictability and increasing project costs and delays. Consider what the scope of each analysis might entail (as further noted in the subsequent sections on each mode), and the effects on predictability and the streamlining of the implementation.	MCDOT, 12/5	Agreed. Requires branding of “manage the dollars and the pennies will take care of themselves” approach.
ST-4/10	Consider what methodologies are available for each mode regarding each step of a potential analysis. For example, what research / practice would support an estimate of person-trips or pedestrian trips generated by a development?	MCDOT, 12/5	To be developed as part of the LATR Trip Generation Study underway on a common timetable with Subdivision Staging Policy; applicable national/regional sources include the MWCOG Household Travel Survey, the MWCOG travel demand model, and the ITE Trip Generation Handbook.
ST-4/11	Consider developing County-specific or TPB-region trip rates based on percentages of limited land use types (Office, Retail, Residential, Industrial, Other) and area type (urban vs. other). This would allow for consistency in trip generation and remove the variability that we have now based on varying modeling and trip generation practices. It seems like this is what the text is hinting at but this table does not reflect it. The goal should not necessarily be to perfect or complicate the analysis, but rather focus on providing the framework for accommodating non-auto travel demand safely and adequately, which in the County's case is directly impacted by NADMS goal setting and not just projected demand.	MCDOT, 12/5	Agreed. See response to ST-4/6
ST-4/12	For each mode, consider not just analysis & providing data, but also how these findings would be utilized toward rectifying identified issues. What criteria will be used to designate required infrastructure, modifications, and treatments? Comments on specific triggers are made under the respective sections AM-1,	MCDOT, 12/5	Agreed – these are elements of the analysis measurement concepts AM-1, AM-2, and AM-3.

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	AM-2, and AM-3.		
ST-4/13	Confirm that 100 person trips reflects net person trips and not explicitly bicycle trips. If the latter, this value appears high: it should at most be lower than the equivalent value for pedestrians &/or vehicle trips.	MCDOT, 12/5	Confirmed.
ST-4/14	Consider whether the statement referencing proximity to Bikeshare, college, or high school should be an “AND” statement or an “OR” statement. Consider whether the range to Bikeshare, college, or high school should be ¼ mile direct, or if it should be a ¼ mile walkshed.	MCDOT, 12/5	Proposed as “OR” and using a crow-flies radius (a quarter mile is a short distance for a bicycle trip); any one of those generators would be considered a bicycle trip generator as proposed.
ST-4/15	MCDOT is currently developing an internal policy for Bikeshare. The current thinking is that it will designate near-term and long-term expansion areas. Note that this may change the nature of this Bikeshare trigger from being distance-based to instead being located within one of these expansion areas (assuming the structure of our draft is unchanged into the final version).	MCDOT, 12/5	Comment noted.
SR-2: Exempt Second Improvement < 5 CLV			
SR-2/1	Even small subdivisions place trip on the roads, sidewalks and bikeways; or use the transit systems. Whereas they could be exempted from doing expensive and complex LATR analysis, they should be expected to make financial contributions to provide permanent transportation solutions.	MCDOT, 12/5	See response to ST-1/1.
SR-3: Protected Intersections			
SR-3/1	Consider both protected intersections and areas	12/3 meeting board	Further consideration needed on how far/wide the influence zone is for a protected intersection (appropriate to retain intersection as the basic unit of protection because the trigger of concern is a CLV finding).
SR-3/2	Process needed to identify intersections	12/3 meeting board	Agreed. This step is underway and should be reported on in February.

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SR-3/3	Don't give up – look at alternative solutions	12/3 meeting board	Solutions would be developed and implemented by the public sector, perhaps using data generated by the private sector.
SR-3/4	In CBD areas OK – further out not so good	12/3 meeting board	See response to SR-3/2.
SR-3/5	Good idea!	12/3 meeting board	Comment noted.
SR-3/6	Implementation of protected intersections will limit capabilities to address congestion. This will inherently imply a higher level of congestion, and potentially a decrease in transportation projects and funding from the private sector	MCDOT, 12/5	Agreed that as proposed, the private sector funding would be decreased. Otherwise, capabilities to address congestion can still be undertaken by the public sector. Selection of candidate protected intersections is dependent on sufficient network redundancy to develop a comfort level with the policy approach (akin to the Potomac Policy Area 2-lane policy).
SR-3/7	While protected intersections may prompt some degree of mode shift as congestion increases, most traffic will tend to remain in their mode of choice: increasing use of use alternate routes. Alternate routes likely will result in traffic using lower classification streets (“cut – thru traffic”), which is not a desirable outcome.	MCDOT, 12/5	The concept of sufficient network redundancy, as proposed, requires traffic dispersion on designated arterial or business district streets that are of an appropriate functional classification to accommodate diverted traffic.
SR-3/8	The Analysis weakness states that this would detract from finding other “negotiated-exaction” solutions, such as non-auto facilities for a per-trip fee. Clarify this statement. It is DOT’s position that alternative solutions need to be permanent in nature.	MCDOT, 12/5	The objective of the Protected Intersection concept is to streamline development approvals from seeking incremental traffic capacity additions (i.e., turn lanes) where none are actually desired by policy. However, one side-effect of the “exemption” would be that a \$12K/trip non-auto facility that would

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			have mitigated the CLV impact at a protected intersection is not put on the table for consideration.
SR-3/9	Criteria for selection as a protected intersection will be critical in ensuring that congestion is desirable at a location and in its vicinity, alternate routes are acceptable for absorbing increases in traffic, and future desirable infrastructure (such as implementation of transit facilities, managed lanes, dynamic lanes, reversible lanes, master planned widening, future turning movements, new intersection legs/accesses, implementation of queue jumpers for transit or BRT, additional / modification / removal of traffic signals / lighting / other traffic control devices, etc.) are not inadvertently restricted.	MCDOT, 12/5	See response to SR-3/2.
SR-3/10	How would protected intersections affect implementation of non-auto treatments, such as the addition of bicycle or pedestrian facilities (particularly if additional ROW, roadway widening, or other changes to geometry are necessary)?	MCDOT, 12/5	As proposed, the protected intersection concept only exempts the location from requiring mitigation of CLV impacts; it does not prohibit physical changes being a condition of development approval.
SR-3/11	Improves predictability; formally establishes understood constraints linked to policy goals.	WMATA, 12/31	Comment noted.
SR-4: Non-Transportation Related Policies			
SR-4/1	Consider clarifying whether any of these exempted facilities are obligated to provide other types of analyses or impact statements.	MCDOT, 12/5	To be clarified.
AA-1: Priority of Mitigation Approach			
AA-1/1	In past a lot of work for little credit	12/3 meeting board	Comment noted; proposed clarifications designed to improve context-sensitivity of approach.
AA-1/2	Concern about duration + enforcement of TMAgs	12/3 meeting board and MCDOT, 12/5	See response to SA-1/6
AA-1/3	From our Department's perspective, the most important approach	MCDOT, 12/5	Comment noted.

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	is that the mitigation is of a permanent nature, or as close to that as legally feasible.		
AA-1/4	Consider whether such a priority approach might affect the capability to have developments construct master planned roadway treatments.	MCDOT, 12/5	Modify approach to elevate the priority of any type of improvement if specifically identified in a master plan or sector plan.
AM-1: Pedestrian System Measurement			
AM-1/1	Should be strengthened in CBD/MSPA/LRT/BRT areas	12/3 meeting board	Comment noted; standards varying according to context are currently under consideration.
AM-1/2	Accessibility should be measured in travel time, not distance (signals cause delay)	12/3 meeting board	Comment noted; both time and distance are currently under consideration.
AM-1/3	Capture quality of ped environment	12/3 meeting board	To be considered, although qualitative aspects expected to be an exception (part of desired flexibility) rather than the rule. As an extreme example, the quality of a sidewalk improved by trimming unruly hedges should not be considered mitigation of a pedestrian gap, but removing utility pole obstructions might qualify.
AM-1/4	Add WMATA list/process for on-site access improvement needs	12/3 meeting board	To be added to approach.
AM-1/5	Analysis should be on whether trip can be made, not on the volume/demand	12/3 meeting board	The proposed approach achieves this objective.
AM-1/6	Consider the degree of detail that would be required: If an impact statement, the goal should be to identify needs & formalize the process that already exists. As it stands, impact statements vary widely in scope & quality between each TIS. A more structured approach (as with vehicular analysis) may improve consistency, predictability, review, and implementation.	MCDOT, 12/5	To be considered further; current accessibility-based proposal would not require data collection

Topic/ Comment #	Comment	Source	Response
	<p>This should have a very weak trigger which would be activated in most cases.</p> <p>If a full quantitative analysis, note that this may entail significant data collection for locations where pedestrian counts are unavailable or inadequate. If analyses find that, for example, sidewalk is too narrow: consider how enforceable widened sidewalk would be if it requires additional right-of-way either on-site or off-site. For purposes of ROW and conditioning costs/construction upon a developer: could a sidewalk widening driven by high demand / limited capacity be just like adding an additional turn lane at an intersection? Or as another example: if pedestrian timings are inadequate would the developer only need to make a note of this, with the impetus still on the County (or other applicable agency) to rectify it?</p>		
AM-1/7	Walksheds should consider that not all roadways are freely traversable. Midblock crossings should not be assumed to be feasible everywhere, except possibly for lower-class roads (and even then not advisable considering walksheds should be reflective of ADA compliance).	MCDOT, 12/5	To be considered further; walksheds analysis should reflect crossings at intersections, but incorporating ADA compliance may be cost-prohibitive (or lead back to a proliferation of handicap ramps at mitigation if defined as a gap)
AM-1/8	Consider evaluations of travel times rather than travel distances. Travel times can be more reflective of the actual conditions, particularly where signal timings can pose a significant delay to pedestrian access.	MCDOT, 12/5	See response to AM-1/2
AM-1/9	Consider whether lunch peak periods should be evaluated. Past evaluations have identified that in urban areas pedestrian volumes can surge dramatically, as in these cases of Silver Spring and Friendship Heights from 2010.	MCDOT, 12/5	To be considered further.
AM-1/10	The last of the Next Steps notes identifying methods to incentivize this issue. Also consider situations where we may wish to require action upon this issue.	MCDOT, 12/5	To be considered further.

Topic/ Comment #	Comment	Source	Response
AM-1/11	Important to accurately assess walkability gaps & impact of links; analysis can be done with ESRI Network Analyst; WMATA has walk-shed maps at Metro station areas	WMATA, 12/31	To be considered further.
AM-2: Bicycle System Measurement			
AM-2/1	Should be strengthened in CBD/MSPA/LRT/BRT areas	12/3 meeting board	Comment noted; standards varying according to context are currently under consideration.
AM-2/2	Include topography	12/3 meeting board	To be considered further.
AM-2/3	Should be County responsibility to define and provide metrics	12/3 meeting board	Comment noted; under consideration
AM-2/4	Analysis should be on whether trip can be made, not on the volume/demand	12/3 meeting board	The proposed approach achieves this objective.
AM-2/5	Bikeshare should be consideration	12/3 meeting board	To be considered further.
AM-2/6	<p>As with AM-1, consider the degree of detail that would be required:</p> <p>If an impact statement, the goal should be to identify needs & formalize the process that already exists. As it stands, impact statements vary widely in scope & quality between each TIS. A more structured approach (as with vehicular analysis) may improve consistency, predictability, review, and implementation. This should have a very weak trigger which would be activated in most cases.</p> <p>If a full quantitative analysis, note that this may entail significant data collection for locations where bicycle counts are unavailable or inadequate (which is a much more prevalent issue than pedestrians, compounded by difficulty in whether bicyclists are sometimes counted as either vehicles or pedestrians). As with the</p>	MCDOT, 12/5	To be considered further; current accessibility-based proposal would not require data collection

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	sidewalk case mentioned in AM-1, consider what implementation, conditions, enforcement, etc. can be levied based on the findings of an analysis, be it adequacies identified in capacity or operations.		
AM-2/7	The trigger given at the top of p38 (regarding the Washington DC draft CTR) appears to list particularly large values. Consider whether these thresholds should be smaller. (for comparison, the reference to the draft CTR in the AM-3 appears to have a more reasonable trigger threshold)	MCDOT, 12/5	The proposed trigger in ST-4 is 100 person trips but proximity to bikeshare/land uses indicating a high degree of bike propensity.
AM-2/8	Consider how topography might be factored in, as steep terrain can affect the level of comfort for bicyclists.	MCDOT, 12/5	See response to AM-2/2
AM-2/9	The last of the Next Steps notes identifying methods to incentivize this issue. Also consider situations where we may wish to require action upon this issue.	MCDOT, 12/5	To be considered further.
AM-2/10	Yes, a valuable tool like AM-1	WMATA, 12/31	Comment noted.
AM-3: Transit System Measurement			
AM-3/1	Should be County responsibility to define and provide metrics	12/3 meeting board	Comment noted; under consideration
AM-3/2	Emphasis on transit facility size	12/3 meeting board	To be considered further.
AM-3/3	Emphasis on ped access and quality of bus stops	12/3 meeting board	Ped access under consideration; quality of bus stops to be considered further.
AM-3/4	Purchasing a bus is expensive – a common fund or escrow account payment is better	12/3 meeting board	To be considered further.
AM-3/5	Consider whether this should separate transit trips by mode, such as those generated by local bus, commuter bus, BRT, LRT, Metrorail, etc., both in scoping as well as in potentially differing analyses methodologies for each.	MCDOT, 12/5	To be considered further.
AM-3/6	In the 12/3 discussion groups it was asked what was “local” about transit, an inherently regional subject. I’d counter that apart from peds & bikes, evaluating transit is much like evaluating autos:	MCDOT, 12/5	Comment noted.

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	TPAR addresses their overarching issues, but the operational issues are the focus of LATR. Transit TPAR does not look at demand and capacity, and therefore we feel there is a nexus to include these considerations in LATR.		
AM-3/7	While I think transit analyses may be very important, note that this has a potential to significantly increase complexity. For example, a detailed analysis may be cyclical: the site generates X trips, this prompts additional buses to increase frequency, now because of better service the site generates X+Y trips, which might prompt additional service, etc. We would need to establish criteria as to how to handle such potential iterations.	MCDOT, 12/5	To be considered further; links to the definition of modal analysis thresholds in ST-4. Ideally, the proposed mode split should reflect not only current observations but incorporate expectations for TDM programs and anticipated mitigation. The consideration of latent demand should not be overthought (the same argument could be made for CLV turn-lane improvements but it's generally accepted nationwide that latent demand effects of such improvements are insignificant).
AM-3/8	Coordination with WMATA may be important. If an analysis finds that Red Line capacity is inadequate, could a development be conditioned to contribute toward 8-car trains, increased headways, or parallel bus services? Or if station capacity is inadequate: could a development be conditioned to contribute toward an additional access, or additional stairs to/from platform/mezzanine, etc? How are these issues handled between DDOT and WMATA? Keep in mind that most funding from WMATA's capital and operating costs come from the State, not from the County.	MCDOT, 12/5	Agreed on coordination with WMATA. Current proposal would not examine WMATA or MARC line-haul effects, but would consider access and circulation effects (see also response to AM-1/4).
AM-3/9	Agreed on basic approach, including pedestrian gap analysis. Also suggest explicit analysis of impacts to bus service (crowding, etc.) perhaps as part of coordination step.	WMATA, 12/31	To be considered further.
AM-4: CLV Thresholds			

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AM-4/1	Eliminate CLV thresholds in four CBDS	12/3 meeting board	To be considered
AM-4/2	Different CLV for LRT, programmed BRT	12/3 meeting board	To be considered
AM-4/3	Not all Metro stations are alike - not all should have 1800 CLV (ex. Shady Grove should be lower)	12/3 meeting board	To be considered
AM-4/4	Base threshold on building location, not intersection location	12/3 meeting board	This proposal has been considered in the past. It complicates both stakeholder expectations (i.e., congestion is more acceptable in urban areas), and can result in undesirable requirements (i.e., a non-MSPA development conditioned to add a turn lane at an MSPA intersection that otherwise would pass the test).
AM-4/5	As noted in ST-1, increases in CLV thresholds will inherently result in both a higher tolerance for congestion, and a decrease in transportation projects & funding. This may shift more traffic onto alternate routes (as noted in SR-3) as well as reduce the capabilities of transit operating in mixed traffic.	MCDOT, 12/5	Comment noted.
AM-4/6	In the 12/3 discussions it was raised that there may be a need for a BRT/LRT policy area which is not as high as MSPAs, but still elevated from background thresholds. If implemented, any such increases in CLV thresholds should be strictly limited to implementation of the associated facilities. Estimated opening dates should be used as a target for when the increased threshold would become active. Developers utilizing the higher threshold would only be able to obtain building (or occupancy?) permits at (or within a defined timespan of) opening.	MCDOT, 12/5	To be considered.
AM-4/7	Not all MSPAs are equal, as some (such as Glenmont & Shady Grove) cater strongly toward Park & Rides. Furthermore, the background thresholds around some MSPAs can vary considerably, creating a potentially significant differential at the borders. This	MCDOT, 12/5	To be considered.

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	may create situations where signals at the borders meter traffic into the MSPA, but ultimately congest traffic into the preceding policy area.		
AM-4/8	need higher threshold in walkable Metro Station (CBD) areas.	WMATA	To be considered.
AM-5: HCM/CLV Thresholds			
AM-5/1	Rename Mobility Assessment Report	12/3 meeting board	To be considered as this report, or a similar document, may become a logical repository for a wide variety of multimodal transportation system performance measures developed and maintained by M-NCPPC for Subdivision Staging Policy purposes.
AM-5/2	Do the simulation – HCM+CLV are not enough	12/3 meeting board	Under consideration
AM-5/3	Operational, not planning – Hard to explain to public	12/3 meeting board	Often the public is interested in this information because CLV doesn't reflect their experience. Tools for explanation need to be developed.
AM-5/4	Should County maintain Synchro files?	12/3 meeting board	Under consideration
AM-5/5	The increased information available from HCM & simulations would be very helpful toward ensuring that informed actions can be made, particularly in areas where signals cannot be reasonably assumed to operate in isolation (as CLV assumes).	MCDOT, 12/5	Comment noted.
AM-5/6	However, note that increased use of such models also increases the complexity and cost of developing the analyses and reviewing. Consider establishing guidance on inputs, assumptions, methodologies, etc. (and whether this may require specifying specific modeling packages for specific purposes). Also consider whether it may be beneficial to develop master micro- &/or mesoscopic models for use by developers (in the past it has been	MCDOT, 12/5	Under consideration.

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	noted that the Univ of MD may be a resource in this regard).		
AM-5/7	Need to balance added complexity of simulations with required numbers of applications (expense/time).	WMATA, 12/31	Under consideration.
AS-1: CLV Mitigation Requirement			
AS-1/1	Issues of proportionality of treatments; "Free Rider" issues.	MCDOT, 12/5	Comment noted; applies to a variety of LATR Concepts – see "Other" comments under O-5
AS-2: \$12K Fee Per Trip			
AS-2/1	What is the \$ amount now?	12/3 meeting board	The current amount (per the January 2013 LATR/TPAR Guidelines Table 6) is \$12,000 per peak hour vehicle trip. The Planning Board established the value as \$11,000 per trip based on a literature review and analysis as part of the 2009 Growth Policy (details in Appendix M) and has periodically adjusted the rate for inflation since then.
AS-2/2	What if an option exists for a developer to pay >\$12K/trip, could they instead pay \$12K/trip and skip out of paying that higher amount? Less critical for large developments as this \$12K/trip is capped, but notable for smaller developments	12/3 meeting board	This scenario would only occur if the developer had an option to construct additional vehicular capacity at an intersection and instead opted for a lower-cost payment in lieu option for non-auto facilities.
AS-2/3	Confirm the current fee, which has likely increased beyond the \$12,000/trip listed. An escalation feature must be included in the concept, and the value of \$12,000 to start should be updated, if necessary.	MCDOT, 12/5	See response to AS-2/3. The rate should be increased based on inflation for the 2016 Subdivision Staging Policy.
AS-3: Ped-Bike Gap Contribution			
AS-3/1	Recommend prioritizing this in urban/CBD/MSPA areas	12/3 meeting board	Under consideration.

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AS-3/2	Prioritize bike/ped crossing improvements	12/3 meeting board	To be considered. Defining a crossing gap may from the perspective of a nexus to safety may need to focus on logical termini such as bus stops; also see response to AM 1-7.
AS-3/3	Provide table of what gaps in sidewalk developer must fill rather than requiring analysis	12/3 meeting board	To be considered. As proposed, the concept does require site-specific analysis to create a nexus between the site development and the proposed improvement for required improvements. A master listing of gaps is desirable but may not be cost-effective to maintain countywide.
AS-3/4	This is already done as part of the DRC process. We do occasionally experience pushback, however, particularly where the nexus, proportionality, or benefits of such connections may not be as firmly established. A more formalized policy would help to enforce such off-site connections.	MCDOT, 12/5	Comment noted.
D-1: VMT			
D-1/1	Apply for MSPAs/urban areas only – could be use specific	12/3 meeting board	To be considered further, potentially as a tool for refining use-specific or location-specific policy parameters.
D-1/2	We concur with removal of this alternative from consideration. This may not be the most fitting metric in a local-oriented analysis.	MCDOT, 12/5	Comment noted.
D-2: Connectivity Indices			
D-2/1	We concur with removal of this alternative from consideration. This may be a subject better geared toward the zoning code.	MCDOT, 12/5	Comment noted.
D-3: Screenlines/Cordon Lines			
D-3/1	We concur with removal of this alternative from consideration. This may not be the most fitting metric in a local-oriented analysis,	MCDOT, 12/5	Comment noted.

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	particularly given the limited size of our urban areas & lower density of street networks / alternative routes.		
D-4: Traffic Mitigation Goals (SSP APF2)			
D-4/1	Legally in code – cannot change without Council action.	12/3 meeting board	Under consideration. Cleaning up the code would likely be desirable, although because the code reference defers to commuting goals set by the County Council in the Growth Policy, a change to code is not required.
D-4/2	Change APF at building permit to be the “regular” test	12/3 meeting board	Further consideration needed. Beyond the narrow scope of any particular LATR concept, but a valid Subdivision Staging Policy comment to be addressed.
D-4/3	We concur with removal of this alternative from consideration. NADMS values are better addressed by individual master plans than county-wide policy.	MCDOT, 12/5	Comment noted.
D-5: Areawide Trip/Parking Caps			
D-5/1	Deserves some discussion – federal facilities have caps.	12/3 meeting board	The caps placed on federal facilities are similar to maximum parking requirements initiated during the development of the CR Zone and now in place more broadly through Article 59-6 of the Montgomery County Code. Maximums for each use in Parking Lot Districts and Reduced Parking Areas are included in table 6.2.4B of Chapter 59.
D-5/2	In CR zone and new zoning code rewrite	12/3 meeting board	Comment noted. See response to comment D-5/1.
D-5/3	Check downtown Boston and Cambridge for examples	12/3 meeting board	Comment noted. The City of Boston has a series of parking restrictions for both public and private parking facilities. A

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			series of geographically-based caps have been in place since the 1970s for privately operated public garages in the most urban portions of the city. More recently, the city has developed a broader set of parking space ratio guidelines for a slightly larger geographic area and made all off-street parking a conditional use subject to the City's Zoning Board of Appeals, without establishing any particular numeric caps or other requirements. Additional detail is provided in the revisions to D-5.
D-5/4	Appropriate planning tool but not associated with APF level of service	12/3 meeting board	Comment noted. See responses above.
D-5/5	While we do not oppose this, we agree that at this time it is something that is best handled as part of the Subdivision Staging Policy. However, should available parking become constrained, incorporating a limited parking supply into trip generation / mode splits may become more important. Nonetheless, such an issue may still not fall under the purview of LATR policy per se, but rather the data sources that feed into the LATR analysis.	MCDOT, 12/5.	Under consideration.
O-2: Review Processes by Multiple Agencies			
O-2/1	Remove staging ceiling for Great Seneca Science Corridor area	12/3 meeting board	While certainly associated with LATR and Subdivision Staging Policy concerns, such a change requires a Master Plan amendment; a process contemplated under the monitoring provisions of the Great Seneca Science Corridor Sector Plan staging element.
O-3: Defining Area Types for Future SSPs			

Topic/ Comment #	Comment	Source	Response
O-3/1	Allow for more density in CBD/MSPA/LRT station areas	12/3 meeting board	The establishment of maximum allowable densities is the jurisdiction of zoning and master plans as adopted by the Council.
	O-6: Free Rider Issues		
O-6/1	Impact tax helps address	12/3 meeting board	Comment noted.