

Action Committee for Transit, Inc. | Coalition for Smarter Growth  
Sierra Club Montgomery County Group

October 10, 2007

RE: Sustainability and the Growth Policy

Dear Council members:

We urge you to implement the exciting ideas in the first part of the recent Growth Policy document, and make sustainability a goal of Adequate Public Facilities regulation, so that sustainability and APF regulation become elements of a well-integrated Growth Policy for the County. In this letter we propose an alternative to the policy area review that we believe will go a long way towards achieving that goal. A means of managing development in Metro station areas is also proposed. It will better respond to the need to concentrate development in these areas, and also provide the urban public facilities that improve their livability.

The Planning Board and Council have not yet conducted the thorough official and public process that will lead to adoption of a complete set of sustainability goals and guidelines. But it is clear that a transition to a more urban transit-oriented growth pattern, and reduction in vehicle travel will play major roles in creating a sustainable County. [See the attached advertisement from the APTA which announces the results of a major study.] Thus urbanism and shift in mode share away from cars will surely be adopted as goals. Because the Council will not again make fundamental changes in Adequate Public Facilities rules for at least two years, and possibly much longer, it is important that these goals be incorporated into this year's growth policy.

**Policy Area Review** At present, the Council is faced with devising a means of regulating adequate public facilities that will help meet the goals of a sustainability plan before that plan is adopted. We think the proposed Policy Area Mobility Review (PAMR) is a decent start toward a sustainable APF test, with its combined measure of road and transit mobility. But this test is complicated and its parameters are bound to seem somewhat arbitrary. On the other hand, we still find it preferable to a return to the old method of policy area specific job and housing ceilings. That process was far more opaque, complex and arbitrary than the proposed PAMR test. It became ever more opaque and complex as the attorneys thought up and the Council approved exception after exception.

As a far better alternative to both the old method and PAMR, we propose a new measure that is simpler both in concept and in measurement. It is also more directly tied to sustainability. We noted above that the level of motor vehicle travel is a major indicator of sustainability. Traffic generation by new development is a problem that goes way beyond global warming in its potential for negative impacts: disruption of neighborhoods, time wasted, air and water pollution, creation of need for road widening and building with various environmental impacts.

We propose that vehicle miles traveled (VMT) per housing unit or per job (or unit of floor space) become the basic traffic measure for approving development. It is easy to understand; traffic models forecast it routinely. It is especially appropriate as a test of larger area impact since the travel generated by a new development extends beyond its own policy area, and especially impacts the major employment centers in Urban Ring and I-270 Corridor.

We will not presume to recommend exactly how this measure, which we will call **Regional Traffic Impact**, would be applied. Appropriate VMT generation standards would need to be determined based on land use, location in the County, etc. The VMT standard should be set so that VMT from new development would be reduced. It should be combined with a test of meeting transit mode share targets, if such targets are set in an area's master plan.

While there is not time to determine these standards now, we ask the Council to act now to set the process in motion. The planning staff should be asked to study the issue and propose VMT and mode share standards that will significantly reduce the vehicle travel impact of new development.

**Local Area Review** Local Area Transportation Review (LATR) would remain as a test of road congestion. We agree with making the LATR test more demanding but only in areas that lack decent transit service. Further study is needed of adjustments to correct some of the unintended consequences of the current LATR test, especially the disincentives it creates for pedestrian-friendly environments. LATR should be modified to make it easier for a developer to get credit for bicycle/pedestrian or transit improvements in any town center, or mixed use area or corridor.

**Transit Station Areas** These major mixed use urban centers (existing and prospective) are exactly where sustainability directs that development occur. We must learn to attain a level of urbanity in which development can occur without generating much new car traffic. This partly depends on master plan and zoning ordinance parameters beyond the scope of APF tests: balanced land use, excellent transit service, road and sidewalk design, better control over the availability of parking. Improvements in local transit service and bicycle/pedestrian facilities can be accelerated by developer contributions required in traffic mitigation plans.

We agree with the planning staff's suggestion to combine policy area and local area review for Metro station areas. Experience has shown the success of Arlington's method for regulating development in its Metro corridors. Very large amounts of development have occurred with little increase in traffic. Arlington's method is much as staff has proposed:

- Limited provision of parking spaces. The parking ratios allowed in new development are considerably lower than Montgomery County's requirements. While a thorough review of parking management may require expert consultant studies, planning staff can propose revisions to the parking chapter of the zoning ordinance, which regulates new development.
- Strong traffic mitigation plans, strongly monitored. Staff finds this may be a burden on urban builders/property managers, but it is working well in Arlington. The Council should ask staff to study Arlington's methods for making such traffic mitigation plans efficient and feasible. Among other actions, we repeat our earlier proposal that planners prepare comprehensive bicycle/pedestrian and local transit plans for the transit station areas. Developers could include facilities from the plans in meeting their traffic mitigation requirements.

Sincerely,

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