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MONTGOMERY COUNTY PLANNING DEPARTMENT THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Proposed Policy for Determining PAMR Credits for Developments in CBDs and Metro Station Policy Areas

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Description

At the request of the Planning Board, staff has examined the concept behind the current "CBD trip credit" that has been applied when calculating an applicants' trip mitigation requirement under the Policy Area Mobility Review (PAMR) test for several projects located in CBDs. Although it appears that a specific methodology to apply such a CBD trip credit has never been adopted by the Planning Board, staff has been applying a credit that is consistent with the overall policy of encouraging and incentivizing transit-oriented and transit-dependent developments in CBD areas, to promote densities in CBDs greater than those in the larger policy areas in which they are located.

In practice, the current CBD trip credit methodology as applied by staff has either fully eliminated or substantially reduced the PAMR trip mitigation requirement for a majority of recent developments in the Bethesda and Silver Spring CBDs. Though the methodology appears logical, reasonable, and practical, and in all cases, provides substantial relief to the Subdivision Staging Policy required PAMR trip mitigation requirements for developments in CBD areas, the methodology occasionally results in outcomes that have been challenged by applicants. This staff report explains the current methodology as applied to developments in the Bethesda and Silver Spring CBDs recommends expanding it to Metro Station Policy Areas (MSPAs) and recommends a simple alternative to calculate the CBD trip credit moving forward.

It is noted that any change to the current methodology would be revisited when the Planning Board and the County Council consider the Transportation Policy Area Review (TPAR) as a replacement for PAMR later this year. This change to the current methodology is recommended as an interim measure for projects that must be reviewed before TPAR is adopted.

Summary

- While a PAMR trip credit has been in place for CBD developments for some time, a methodology for determining it has never been adopted by the Planning Board.
- Given the complexity of the current methodology and variability of the results, staff recommends that the Planning Board replace the current method with a simpler approach and extend this trip credit option to all Metro Station Policy Areas (MSPA) except White Flint as well.
- If the Planning Board determines that a PAMR trip credit is appropriate in CBDs and MSPAs, staff recommends that the Board approve a PAMR credit of 50% for each project (with no other credits). The approved methodology should be added to the Local Area Transportation Review and Policy Area Mobility Review Guidelines.

Discussion

Currently, consistent with the general policy of encouraging and incentivizing transit-oriented and transitdependent developments in CBD areas, staff has permitted developments located within CBDs to use a calculated trip credit toward the PAMR trip mitigation requirement stipulated by the Subdivision Staging Policy. As illustrated in Figure 1, this trip credit is equal to the difference between the trip generation estimate for a development using Countywide (i.e., non-CBD) trip generation rates and CBD trip generation rates. In principle, this credit can be considered equivalent to the reduction in trips that a CBD development can achieve given its close proximity to multiple non-auto transportation modes compared to a development outside the CBD where these options are limited.



Figure 1: Current PAMR CBD Trip Credit Calculation Methodology

In practice, the current CBD trip credit methodology has either fully eliminated or substantially reduced the PAMR trip mitigation requirement for a majority of recent developments in the Bethesda and Silver Spring CBDs. Although the methodology used can be clearly explained in each instance, the results can be viewed as subject to interpretation depending on the trip generation rates used (M-NCPPC, ITE, observed driveway counts, etc.), whether the site is developed or undeveloped, whether the site has a high-density mix of uses or not, and so forth. This was demonstrated by a recent case (Bethesda Center, Preliminary Plan No. 120120070). Moreover, the PAMR trip mitigation requirement is further complicated by the fact that the trip mitigation requirements for a policy area may change from year to year.

To address and eliminate these concerns, staff recommends that the current methodology for calculating PAMR trip credits for CBD developments be replaced with a simpler approach. Staff recommends that the Planning Board adopt a new policy that developments in CBDs and MSPAs shall receive a PAMR credit equivalent to 50% of their PAMR trip mitigation requirement (with no other credits), consistent with the Planning Board's policy to encourage growth in these areas. All MSPAs except White Flint (since White Flint already has its own taxing district to fund its transportation infrastructure) are recommended for inclusion in the new policy. (See Attachment for CBD and MSPA maps). The recommended PAMR CBD trip credit calculation methodology is illustrated in Figure 2.

Figure 2: Recommended PAMR CBD Trip Credit Calculation Methodology



Since the PAMR trip mitigation requirements stipulated by the Subdivision Staging Policy are determined for larger policy areas, which typically contain the CBDs and MSPAs, there is no incentive built into the Subdivision Staging Policy for developments to locate specifically in these areas. The recommended 50% trip credit would offer that incentive and will be similar to the credit in the current Subdivision Staging Policy, which caps the "full mitigation" requirement for policy areas that require full PAMR mitigation at 50%. The recommended 50% CBD PAMR credit thus focuses and incentivizes growth within these defined CBDs and MSPAs. The proposed methodology also has the added benefit of starting the LATR and PAMR analysis for a development from the same trip generation base.

Therefore, rather than coming up with a new complicated formula or methodology, or other basis for an appropriate credit, staff believes that the 50% credit to the PAMR trip mitigation requirement will offer a fair, simple, and consistent policy for CBD and MSPA developments. This will continue to provide an appropriate incentive for transit-oriented and transit-dependent developments to locate in these areas.

CE/EA/MD/tc Attachment – CBD and MSPA Maps

PAMR Procedures Staff Report.doc























