



April 30, 2020

MEMORANDUM

TO: Gwen Wright, Planning Director
VIA: Jason Sartori, Chief, Functional Planning & Policy Division
FROM: Eric Graye, Planning Supervisor, Functional Planning & Policy Division
SUBJECT: **Traffic Counts During COVID-19 Pandemic**

The COVID-19 virus pandemic has introduced a new level of uncertainty into traffic analysis in Montgomery County. The impact on business, public offices, schools, other facilities, transit, coupled with the expansion of telework, has substantially reduced the total amount of motor vehicle and other traffic in the County.

Alternative Approaches

The value of a Transportation Impact Study (TIS) or the baseline traffic counts used in support of the evaluation of the transportation element of master plans is undermined if the underlying assumptions are flawed in some way. Any traffic count data collected for a TIS or in support of a master plan/sector plan evaluation in the current environment would be too skewed to be valid. In response, the Planning Department (Department) has established a policy to suspend traffic count data collection in the County until further notice. At the same time, there is the recognition that the Department does not want to inhibit development applications and master plan evaluations from proceeding and has considered the following methods for temporarily addressing this issue:

1. Growth Factor Approach

This approach requires using previously collected traffic counts and applying a growth factor to bring these counts "up to date." Under this approach, the growth rate for a development would be created using the historical data from the nearest Maryland State Highway Administration (SHA) roadway. Traffic counts which are less than one year old would be permitted without a growth factor and traffic counts one to three years old would be permitted with a growth factor. Traffic counts more than three years old should not be permitted. It is our understanding that SHA has also recommended against using traffic counts that were collected more than three years ago.

2. Traditional Counts After Specified Time Approach

This approach would require the current suspension of traffic counts to be maintained until a specified date. After that date, the collection of traffic counts to support submission of TISs and the evaluation of master plans would resume as normal.

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3. Adjustment Factor Approach

This approach requires taking new counts under current conditions and applying an adjustment factor reflecting expected conditions under a non-COVID-19 scenario. This approach involves making assumptions that could just as easily be made without conducting any counts at all.

Recommendation

Staff recommends that a combination of the first two approaches be used. Under this recommendation no *new* counts for development applications or master plan evaluation shall be collected until fall 2020, at a date to be determined by staff. After this date, traffic counts may resume under the existing guidelines, assuming pandemic-related restrictions and conditions subside.

Until new traffic counts can be collected, a TIS in support of a Preliminary Plan or Site Plan application may proceed **if** there are **existing** counts for all critical intersections¹ of the proposed development that were collected within three years of the date the applicant is required to submit final drawings for completion of staff and agency reviews of the application (hereafter referred to as the application's 65-day deadline). Under this provision, staff would have reasonable discretion with regard to determining conformance with the timing requirements below:

- Existing counts collected within a year of the application's 65-day deadline can be used in a TIS without adjustment.
- Existing counts collected between one and three years prior to the application's 65-day deadline may only be used if modified by a growth factor. The growth factor must be developed based on the past ten-year historical traffic volume data for the nearest SHA roadway. This growth rate should be approved by the Planning Department in coordination with the Development Review Committee prior to acceptance of the TIS.
- Traffic counts collected more than three years earlier than the application's 65-day deadline will not be accepted and may not be used to assess the finding of Adequate Public Facilities.

For new subdivision applications where no traffic counts as described above have occurred, Staff may accept an application without the required TIS. However, a TIS will need to be submitted and reviewed before a public hearing is scheduled. This may result in a delay in the timing of the application but would allow the application review to continue. In the event the outcome of the TIS is integral to the findings, the agencies may need additional time to circulate and review the TIS. Sketch Plans and Site Plans may still be submitted in accordance with the development review procedures.²

It is important to note that the policy described above largely mirrors that recently adopted by the Prince George's County Planning Board on April 9, 2020. Planning Department staff views this

¹ The criteria used to determine critical intersections are described in the [LATR Guidelines](#), pages 36-37. The Guidelines provide language that speaks to the consideration of "special circumstances" which could be applied to the COVID-19 situation with regard to determining critical intersections.

² The exception to this being Site Plans requiring adequate public facilities evaluation because a Preliminary Plan was not required. In those cases, the Site Plan cannot come before the Planning Board until valid traffic counts and a TIS are completed.

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proposed policy as reasonable and sees great value in maintaining consistency with our Prince George's County sister agency in this regard.

Concurrent with the adoption of this proposed policy, Planning Department staff will continue to investigate opportunities to utilize innovative approaches such as "Big Data"³ to estimate traffic counts.

³ Transportation data providers collect all kinds of "Big Data" (i.e., vehicle probe data) information generated from global positioning system, Bluetooth®, their own subscribers, and supplemental data they purchase from location-based service providers. These companies generate speed data estimates, traffic congestion estimates and origin-destination information. Research is currently underway to determine if these data can also be used to estimate traffic counts.