



**PARK CITY PLANNING COMMISSION MEETING
SUMMIT COUNTY, UTAH
December 16, 2020**

PUBLIC NOTICE IS HEREBY GIVEN that the PLANNING COMMISSION of Park City, Utah will hold its Regular Planning Commission Meeting at the City Council Chambers, 445 Marsac Avenue, Park City, Utah 84060 for the purposes and at the times as described below on Wednesday, December 16, 2020.

NOTICE OF ELECTRONIC MEETING AND HOW TO COMMENT VIRTUALLY:

This meeting will be an electronic meeting without an anchor location as permitted by Utah Code Open and Public Meetings Act section 52-4-207(4) as amended June 18, 2020, and Park City Resolution 18-2020, adopted March 19, 2020. The written determination of a substantial health and safety risk, required by Utah Code section 52-4-207(4) is attached as Exhibit A. Planning Commission members will connect electronically. Public comments will be accepted virtually as described below.

To comment virtually, raise your hand on Zoom. Written comments submitted before or during the meeting will be entered into the public record, but not read aloud. For more information on participating virtually and to listen live, please go to www.parkcity.org/public-meetings.

Exhibit A: Determination of Substantial Health and Safety Risk

On November 18, the Commission Chairperson determined that conducting a meeting with an anchor location presents a substantial risk to the health and safety of those who may be present at the anchor location.

Utah Code section 52-4-207(4) requires this determination and the facts upon which it is based, which include: • Governor Herbert declared a COVID-19 State of Emergency on November 8, 2020. • Summit County has extended its Emergency Declaration and Public Health Emergency Declaration through January 8, 2021. • Statewide COVID cases and hospitalizations are increasing exponentially.

This determination is valid for 30 days, and is set to expire on December 18, 2020.

Dated: November 18, 2020

MEETING CALLED TO ORDER AT 5:30 PM.

1.ROLL CALL

2.PUBLIC COMMUNICATIONS

3.STAFF AND BOARD COMMUNICATIONS AND DISCLOSURES

4.REGULAR AGENDA

- 4.A. Park City Mountain Resort Base Parking Lots - MPD Modification - Replace Expired Exhibit D of the DA, the 1998 PCMR Base Area Master Plan Study Concept Master Plan, With a New Master Plan, Known as the Park City Base Area Lot Redevelopment Master Plan Study. This Hearing Will Focus on Sustainability. PL-20-04475.

Public Input will be taken via e-comments

(A) Public Hearing, No Action Will Be Taken

[PCM Base Staff Report 12162020](#)

[Exhibit A: Applicant's Sustainability Guidelines Revised 12012020](#)

[Exhibit B: Draft Sustainability FOF and COA](#)

[Exhibit C: Public Comments](#)

[Exhibit D: Background Information and MPD Process](#)

5.ADJOURN

A majority of PLANNING COMMISSION members may meet socially after the meeting. If so, the location will be announced by the PLANNING COMMISSION Chair Person. City business will not be conducted. Pursuant to the Americans with Disabilities Act, individuals needing special accommodations during the meeting should notify the Planning Department at 435-615-5060 or planning@parkcity.org at least 24 hours prior to the meeting. Wireless internet service is available in the Marsac Building on Wednesdays and Thursdays from 4:00 p.m. to 9:00 p.m. Posted: See: www.parkcity.org

***Parking validations will be provided for meeting attendees that park in the China Bridge parking structure.**

Planning Commission Staff Report



PLANNING DEPARTMENT

Subject: Park City Mountain Base Area
Development – Sustainability
Project #: PL-20-04475
Author: Alexandra Ananth – Senior Planner
Date: December 16, 2020
Type of Item: Administrative Public Hearing – MPD Modification

Summary Recommendation

Staff recommends the Planning Commission conduct a public hearing with a focus on the applicant's revised Sustainability Guidelines.

No action on the proposed [*Park City Base Area Lot Redevelopment Master Plan Study*](#) is expected until the Commission has completed its review of the entire project. The next Planning Commission public hearings for this project are tentatively scheduled for January 20, 2021, February 17, 2021, and March 17, 2021. Schedule updates will be posted here as soon as they are available:

<https://www.parkcity.org/departments/planning/park-city-mountain-base-area-development-project>

Project Description

Applicant: PEG Development c/o Robert Schmidt
Location: PCMR Base Parking Lots including Parcels SA-402E, SA-402-A-1-A, SA-402-A-2, SA-253-B, SA-253-B-2-A, and SA-253-C
Zoning District: Recreation Commercial (RC)
Adjacent Land Uses: Park City Mountain Ski Resort, Resort Support, Hotel, Single Family and Multi-Unit Residential, Open Space
Reason for Review: MPD amendments require Planning Commission review and approval and a finding of compliance with the Park City General Plan and the Land Management Code

Acronyms

Park City Mountain Resort (PCMR)	Recreation Commercial (RC)
Park City Mountain (PCM)	Conditional Use Permits (CUP)
Development Agreement (DA)	Comfortable Carrying Capacity (CCC)
Master Planned Development (MPD)	Return on Community (ROC)
Land Management Code (LMC)	VR CPC Holdings, Inc. (VRCPC)
Recreational Open Space (ROS)	Transportation Demand Management Plan
(TDM)	Level of Service (LOS)
Traffic Impact Study (TIS)	Transportation Network Companies (TNCs)

Terms that are capitalized as proper nouns throughout this staff report are defined in [LMC § 15-15-1](#).

Sustainability was discussed at the [October 28, 2020](#), meeting, with both the Planning Department and Planning Commission requesting more details on concrete and measurable commitments from the applicant. On December 2, 2020, the applicant submitted revised Sustainability Guidelines (**Exhibit A**) which have been reviewed by the Planning and Sustainability Departments.

Analysis

The Planning Commission must evaluate the applicant's Sustainability Guidelines in accordance with the Park City [General Plan](#) and the [MPD section of the LMC](#). The 1998 DA is silent on sustainability with the exception of the consolidation of density and height variations granted on the parking lots in exchange for development restrictions on the Open Space designations within the 1997 Master Planned Area, and the Park City Alpine Terrain, as development at the base area was believed to be preferable to development that spread up the mountain and into Summit County.

The General Plan notes that planning for air quality, water quality, and wildlife is imperative to provide the quality of life for future generations that Parkites experience today. As per Goal 5, Environmental Mitigation, Park City will be a leader in energy efficiency and conservation of natural resources by reducing greenhouse gas emissions. But it's not enough for the City to just do its part, while the City is working to green its codes, the private sector must collaborate and reduce projected emissions as well, including development projects, by decreasing vehicle miles traveled through improved transit and pathway connectivity, encouraging efficient building envelopes and infrastructure, energy and water conservation techniques, utilization of renewable energy technology and decreasing waste generation.

In 2016 Energy was elevated to a Critical Priority by the City Council, and energy efficiency and reducing energy demand, are prioritized for municipal building projects. In 2017, the Council adopted [Resolution 28-2017](#), which establishes net-zero energy performance standards for City buildings; and in 2018, the City Council adopted [Resolution 32-2018](#) to meet annual electricity needs through renewable resources by 2022 for City operations, and by 2030 citywide. Incorporation of renewables, zero waste and regenerative practices are also recommended.

[LMC Section 15-6-6\(L\)](#) requires the Planning Commission to make the following finding for MPD projects: The MPD, as conditioned:

- L. incorporates best planning practices for sustainable development, including water conservation measures and energy efficient design and construction, per the Residential and Commercial Energy and Green Building program and codes adopted by the Park City Building Department in effect at the time of the Application;

The base area project will add a significant load to the City's energy demand and carbon footprint, therefore it is imperative that the applicant's project be designed to be

as sustainable as possible from the outset, minimizing carbon emissions and maximizing electrification of the site. In order for the Planning Commission to make the finding above, the applicant's plan must include concrete and measurable commitments with a focus on:

- Energy modeling in the design process of buildings to achieve targeted energy savings at least 20% greater than current energy code requirements (currently IECC 2018);
- Projected Energy Use Intensity (pEUI) targets for each building to predict and verify the energy demands for each building (useful in energy modeling and benchmarking). The applicant is targeting an average pEUI of 25 for the four (4) building parcels at full build-out which is exceptionally energy efficient and above code requirements;
- Scalable on-site renewable energy generation capabilities;
- The purchase of Renewable Energy Credits (RECs) in the short run to make the project REC-ZEB and balance the annual delivered energy with clean energy credits;
- Energy commissioning for each building for monitoring and verification post occupancy;
- A performance verification system including annual reporting to the City;
- Mechanical systems that are Energy Star (or similarly) rated;
- Plumbing fixtures that are WaterSense (or similarly) rated;
- BMPs for storm water;
- Waterwise landscaping and irrigation techniques.
- A Construction Waste Management Plan including recycling and fill diversion that will be monitored by the City;
- A Waste Management Plan and recycling accommodations in each building;
- Compliance with the City's Electric Vehicle and (soon to be adopted) Dark Sky Ordinances;

The applicant's revised Sustainability Guidelines, dated 12/1/2020, (Exhibit A), detail the applicant's plan to ensure the project meets the City's goals. After reviewing and analyzing the applicant's Guidelines, the Planning and Sustainability Departments worked with the applicant to turn their Guidelines into Draft Sustainability Focused Findings of Fact and Conditions of Approval (**Exhibit B**). Although the City and the applicant are still working to refine a few details, including how outdoor energy use, such as fire pits, will factor in to the applicant's Guidelines, the applicant has agreed they can comply with the Draft Conditions of Approval. Therefore, ***should the Planning Commission choose to approve this project, the Planning Department recommends the Planning Commission consider Exhibit B.*** Any final changes to this Exhibit will be reviewed with the Planning Commission prior to a vote on this project.

Sustainability with respect to transportation, vehicle emissions, and congestion, will be discussed at a future transportation focused meeting and are not yet incorporated into the Draft Conditions of Approval.

Notice

On May 13, 2020, notice of the May 27, 2020, Work Session was mailed to property owners within 300 feet. Legal notice was also published on the Utah Public Notice Website and in the Park Record on May 13, 2020.

Notice for this meeting was published on the Utah Public Notice Website and Park Record on December 5, 2020.

Public Input

Public comments received since the last Staff Report are attached (**Exhibit C**). Public input received after the publication of this Staff Report will be forwarded to the Planning Commission and attached to subsequent Staff Reports.

Public comments will be taken at the public hearing but should be focuses on sustainability.

Project History

PEG Development has submitted an application requesting to amend the [1998 Park City Mountain Resort \(PCMR\) Development Agreement \(DA\)](#), and specifically, to replace expired Exhibit D of the DA, the [1998 PCMR Base Area Master Plan Study Concept Master Plan](#), with a new Master Plan, known as the [Park City Base Area Lot Redevelopment Master Plan Study](#).

On [July 8, 2020](#), the Planning Commission made a formal determination that the applicant's proposed new site plan was a substantive modification to the MPD and therefore will justify review of the entire master plan and Development Agreement by the Planning Commission. The public hearing process was opened on [August 26, 2020](#), with a focus on the site plan, programming, architecture, landscape design and Open Space, and consideration of the applicant's requested exceptions to perimeter Setbacks and Building Height requirements; a hearing on [September 23, 2020](#), focused on transit and pedestrian connectivity, traffic, parking and circulation. A meeting on [October 28, 2020](#), focused on Sustainability, Utilities, Project Phasing and Construction Mitigation. A meeting on November 18, 2020, focused on changes to Building B. It is expected that many of these topics will be discussed further at future public hearings.

The redevelopment of the Park City Mountain base area provides an exciting opportunity to greatly improve the existing base area with improved transit access and amenities, purposeful and active open spaces, attractive mountain architecture, skier services and amenities, conference space and housing opportunities, in keeping with [Park City's General Plan](#) and the MPD Requirements of [LMC Chapter 15-6](#).

Proposal

On February 13, 2020, PEG Development submitted an application to the City Planning Department to amend the 1998 PCMR Development Agreement (1998 DA) by replacing expired Exhibit D, *the PCMR Base Area Master Plan Study or Concept Master Plan*, with a new Master Plan.

Approval of the proposed amendment to the DA will result in either a new or amended DA, replacing the 1998 DA. Should this project be approved, subdivision and conditional use permit (CUP) approvals will be required for each parcel prior to the issuance of any building permits.

Additional background information on the proposed project and information on the MPD process can be found in **Exhibit D** of this Staff Report.

Exhibits

Exhibit A – Applicant's Revised Sustainability Guidelines Dated 12/1/2020

Exhibit B – Draft Sustainability Focused Finding of Fact and Conditions of Approval

Exhibit C – Public Comments

Exhibit D – Background Information and Summary of MPD Process

Park City Base Master Plan

Sustainability Guidelines





Contents

Park City Base Master Plan
Sustainability Guidelines

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Executive Summary and Sustainability Commitments

PEG Development has been selected by Vail Resorts as the Developer/Owner of the Park City Base Master Plan.

The property consists of 4 parcels described as Parcel B, C, D, and E in the Park City Base Area Master Plan. Currently the parcels are used for surface parking. Development of the Project is subject to and generally governed by two Development Agreements (1998 and 2008) and the Park City Base Area Master Plan. We recognize the importance of Park City's ambitious and achievable climate goals to be net-zero carbon and run on 100% renewable electricity for the whole community by 2030 through Resolutions 28-2017 and 32-2018.

The **Sustainability Guidelines for the Park City Base Master Plan (PC BMP)** respond to local energy and environmental issues as it relates to the built environment. We recognize the critical priorities and high-level strategies that lead to the success of the Resolution, such as Energy Efficiency, Electrification, 100% Renewable Electricity and Regeneration all of which are addressed herein. The guidelines found herein this document are meant to include sustainability commitments and suggestions on achievable performance indicators that are measurable. The guidelines are meant to be flexible to accommodate any proposals for change as design progresses and inform decision on best practice.



The PC BMP is committed to:

- Integrating energy modeling and commissioning throughout the design process and in operation to create feedback loops to inform decisions that will improve energy efficiency over time.
- Utilizing management tools to track and verify building performance including:
 - manage energy consumption of each building by logging electricity consumption and demand.
 - recording Renewable Energy Certificates purchases.
 - whole property water use including both indoor and outdoor use.
 - materials and waste activities.
- Targeting a 20% savings compared to energy code with a stretch goal of 30% by integrating a high-performance envelope, and appropriately designed mechanical and lighting systems.
- Further evaluating the feasibility of integrating modular micro-anaerobic digester that positions itself as a local environmental impact asset and catalyst that generates on-site renewable energy (biogas) and liquid fertilizer amendment from organic food waste material while minimizing emissions associated with landfill and transport.
- Installing 10 electric vehicle charging stations within each parking garage including 65 stalls to be EV ready by routing conduit (ready to be wired).
- Diverting at least 50% of the total construction and demolition material; diverted materials will include at least four material streams with a stretch goal of 65%.
- Developing a comprehensive waste management plan to reduce landfill waste that is generated by building occupants including accommodations for dedicated areas for recycling and sorting.
- Commission several on-site rooftop photovoltaic areas that would in aggregate (all parcels) support the energy requirements of the parking program.
- Allocating roof areas not utilized for photovoltaic panels at initial construction to be PV ready so that additional panels can be installed in the future.
- Purchase Renewable Energy Credits for the remainder of delivered energy to the site not supported by the on-site renewable energy systems.

Resolution 28-2017/32-2018

Part City, a municipality leading sustainability, has made North America's most ambitious climate goals: to be net-zero carbon and run on 100% renewable electricity for city operations by 2022, and for the whole community by 2030 where annual electricity demands are supplied from 100% renewable sources. The framework of Resolution 28-2017/32-2018 outlines verification pathways (see Figure 1) that new buildings and facilities constructed using municipal funds can follow to minimize environmental impacts.

The PC BMP will respond to the Resolution requirements with the following:

- Integrate performance evaluations beginning in design process.
 - **PEG** is committed to an integrated design process as a method for delivering high performance building that contribute to sustainable communities.
- Measure for one-year post-occupancy to ensure building performance alignment to green building standard.
 - **PEG** is committed to continually measure and manage the energy, water use and waste generation of all parcel buildings for a minimum of 5-years.
- Requires renewable energy to be produced on site to cover the facility's annual need (no off-site credits).
 - The site is not large enough to accommodate all the on-site renewable energy required. Therefore, **PEG** is committed to 8% of the site's energy demands be supported by on-site renewable energy systems with the remainder of the site's energy demands supported by RECs.
- By engaging Energy Modelers and Commissioning Agents can lead to significant financial savings over the lifetime of the facility.
 - **PEG** is committed to integrating energy modeling and commissioning throughout the design process and in operation to create feedback loops to inform decisions that will improve energy efficiency over time.
- Verification pathways include International Living Future Institute's Energy Petal certification; a score of zero on the Zero Energy Performance Index; and Passive House certification.

- o **PEG** will benchmark the performance of all parcel buildings by collecting energy, water use and waste generation and entering the data into ENERGY STAR Portfolio Manager. Additionally, to meet the REC-ZEB definition, Renewable Energy Certificates (REC) purchases and energy generated by on-site renewable energy system will be recorded and tracked against parcel building energy use to ensure a Zero energy accounting energy (e.g. RECs + on-site renewables equal or exceed annual parcel building energy demands).



Figure 1 - Net-Zero Energy Performance Process (Park City)



Net Zero Energy Building Definition

Generally speaking, a zero-energy building produces enough renewable energy to meet its own annual energy consumption requirements, thereby reducing the use of nonrenewable energy in the building sector (as defined by the U.S. Department of Energy – A Common Definition for Zero Energy Buildings, September 2015). Definitions for Net Zero in the guideline document are also provided for groupings of buildings that can extend to a Community (a group of building sites in a specific locality that contain renewable energy production systems) or Campus (a group of building sites in a specific locality that contain renewable energy production system owned by a given institution).

The definitions require the use of a defined site boundary (see Figure 2). The site boundary for a Zero Energy Community would allow a group of project sites at different locations to be aggregated so that the combined on-site renewable energy could offset the combined building energy from the aggregated project sites. Given the program and phasing of the PC BMP we believe this is the best application of a boundary for energy accounting and measurement with consideration for renewable energy certificates and on-site renewable energy generation systems.

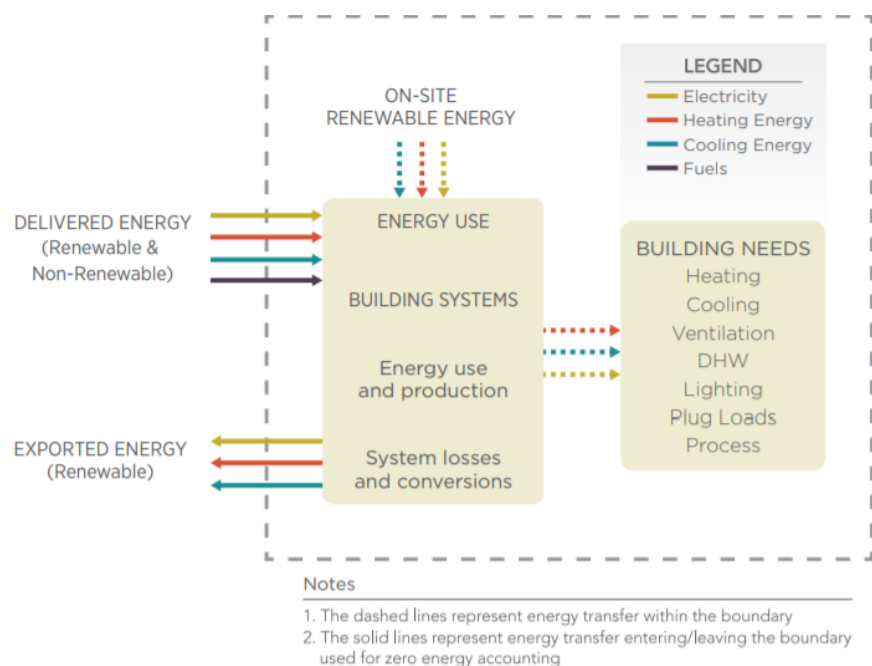


Figure 2 - Site Boundary of Energy Transfer for Zero Energy Accounting (DOE)

REC-ZEB

Multi-story buildings that occupy entire lots may not be able to balance annual delivered energy with on-site renewable energy simply because the site is not large enough to accommodate all the on-site renewable energy required. Per the guideline document, an option exists where building owners may choose to have off-site renewable electricity utilizing RECs help balance the annual delivered energy since their built-up area may result in a commensurate energy requirement that is difficult to meet with a building site.

Renewable Energy Certificate (REC): Represents and conveys the environmental, social and other non-power qualities of one megawatt-hour of renewable electricity generation and can be sold separately from the underlying physical electricity associated with a renewable-based generation source. The REC-ZEB definition allows RECs to be used to supplement, after on-site renewable energy sources have been employed, and balance the annual delivered energy to the building.

We are unable to balance annual delivered energy with on-site renewable energy simply because the site is not large enough to accommodate all the on-site renewable energy required. Therefore, PEG will purchase Renewable Energy Credits for the remainder of delivered energy to the site. We recognize that Park City does not have a policy in place for RECs however in the near term this approach (REC-ZEB) best meets the needs of community and PC BMP.



Figure 3 - Park City Base Master Plan Parcel (B, C, D, E) Boundaries



Energy Efficiency

Energy efficiency requires that a whole building performance targets are established and that it takes into account the intended use, occupancy, operations, plug loads, other energy demands. Establishing an energy efficiency target earlier in the design process ensures that the goal is achieved throughout the design and life cycle of the building. This section (Energy Efficiency) addresses reducing energy consumption, high-performance envelope, and appropriately design systems.

PC BMP is targeting a 20% savings compared to energy code with a stretch goal of 30% by integrating a high-performance envelope, and appropriately designed mechanical and lighting systems. We anticipate the predicted Energy Use Intensity (pEUI) of the PC BMP (all parcels considered at full build-out) to result in a pEUI-25.0 average which meets Park City's energy target of pEUI-25 for new construction buildings. This will account for the different occupancy types at the Parcels and associated energy demands. Additionally, the 20% energy savings would provide enough whole-building performance "headroom" as energy code adopts more stringent requirements in the future (e.g. PC BMP at the time of completion, all Parcels, will be more efficient, as-designed, than the current code at that time).

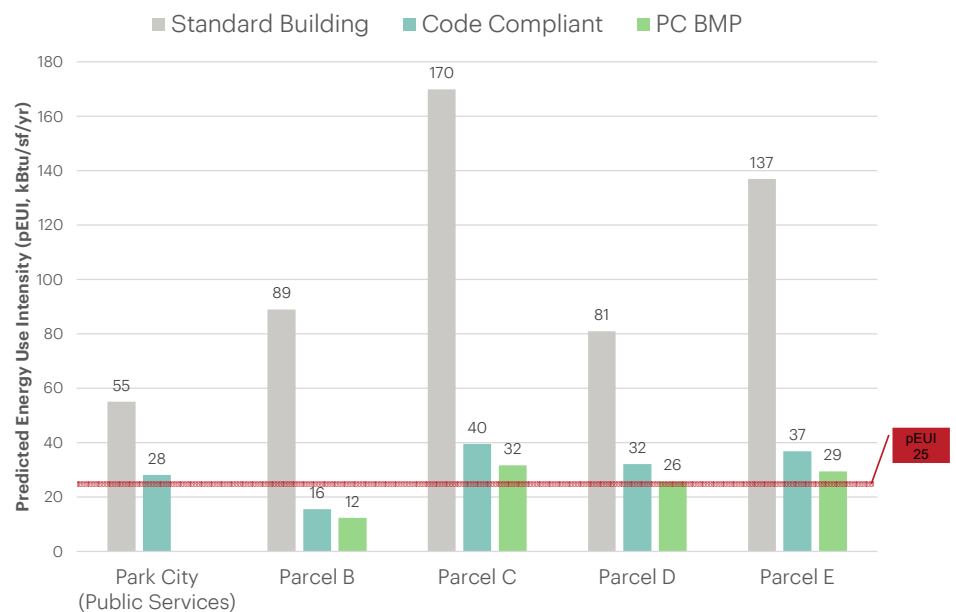


Figure 4 - Park City Base Master Plan (PC BMP) EUI Benchmarking

Energy Use Intensity

PC BMP has completed several benchmarking iterations based on program in conjunction with early phase energy modeling and analysis to understand how to best leverage energy efficiency in each of the Parcels to achieve Park City's energy target. To best inform design decisions, the predicted Energy Use Intensity (pEUI) is used to describe modeled site energy. This provides a means to facilitate comparative analysis to benchmark the performance of a design to buildings in a similar geographic location accounting for both climate and available fuel and energy sources. Thus, we have included two benchmarks to compare the performance of the PC BMP: Standard Building and Code Compliant (see Figure 4).

The AIA 2030 Commitment is a growing national initiative that provides a consistent, national framework with simple metrics and a standardized reporting format to help firms evaluate the impact design decisions have on an individual project's energy performance. The American Institute of Architects (AIA), the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), Architecture 2030, the Illuminating Engineering Society of North America (IESNA), and the U.S. Green Building Council (USGBC), supported by representatives of the U.S. Department of Energy, agreed to define the baseline starting point for their common target goals as the national average/median energy consumption of existing U.S. commercial buildings as reported by the 2003 Commercial Building Energy Consumption Survey (CBECS). CBECS data is a set of whole-building energy use measurements gathered by the DOE's Energy Information Administration, which can be used to determine a national energy use intensity using kBtu/sq. ft.-yr as the metric. Therefore, we have elected the use of the *Standard Building* illustrated in Figure 4 in alignment with the national initiative as HKS Architects is a signatory of the AIA 2030 Commitment.

Rules governing the energy efficiency for the design and construction of buildings and structures, in the State of Utah, Energy Code, are those contained in the International Energy Conservation Code, 2018 edition, (with reference to ASHRAE Energy Standard for Buildings Except Low-Rise Residential Buildings, ANSI/ASHRAE/IESNA Standard 90.1-2016). We note this as a *Code Compliant* building in the PC BMP EUI Benchmarking illustrated in **Figure 4**.

The pEUI reporting of the PC BMP as illustrated in Figure 4 represents the integration of a high-performance envelope, and appropriately designed mechanical and lighting systems that contribute to the 30% stretch energy reduction target. The following energy efficiency measures (EEMs) have been targeted that result in the energy end use breakdowns per Parcel (see Figure 5 and Figure 6):

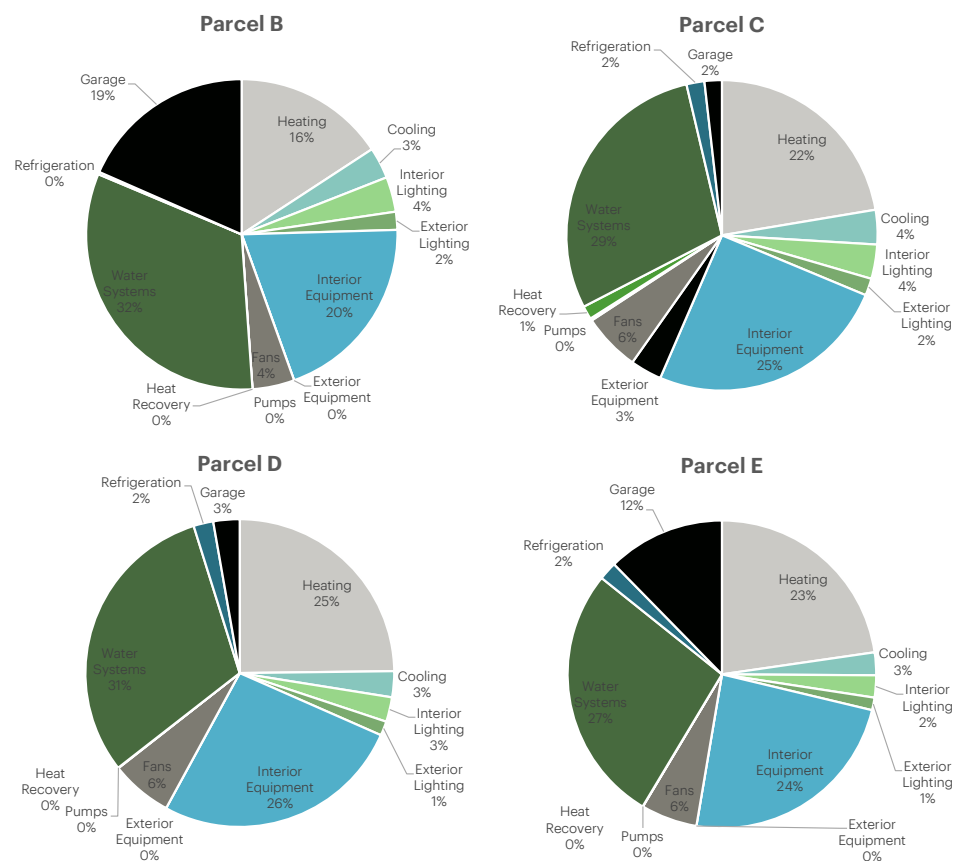


Figure 5 - PC BMP Parcel Energy End Use Breakdown

PEG recognizes Park City's desire to eliminate all fossil fuel burning to reduce the amount of Scope 1 emissions directly in the Community. While the PC BMP includes building electrification, PEG is still undergoing the design and engineering of proposed fire pits.

Energy Efficiency Measures

Envelope

- Utilization of a “dark roof” to increase solar radiation roof absorption (high absorption coefficient >0.40) thereby keeping the building enclosure “warmer” to decrease heat flux and reduce electrical demand due to heating.
- Improving the roof insulation beyond prescriptive thermal performance requirements (R-30) by specifying roof insulation to achieve an R-40 rating to moderate indoor temperature and decrease heating demand.
- Exterior wall design shall be improved by 20% (assembly U-Value) in comparison to prescriptive thermal performance requirements (U-0.049) to decrease heating and cooling loads.
- Limit exterior glazing so that the overall building window-to-wall ratio (WWR) does not exceed 35%.

Lighting

- Reduce baseline lighting allowance for interior lighting by 50% through the use of high-efficiency LED lighting with occupancy-based controls and daylight harvesting.
- Utilize high-efficiency exterior LED lighting where the overall exterior lighting power is reduced by at least 40% in comparison to prescriptive power allowances.

HVAC

- Improve heating and cooling efficiency of unitary mechanical equipment so that it achieves a 30% betterment (premium-efficiency) in comparison to ASHRAE 90.1-2016 minimum efficiency requirements.
- Utilize instantaneous (tankless or demand-type) high-efficiency domestic hot water systems to decrease heating demand and only provide hot water when it is needed.
- Premium efficiency motors for fans and pumps will reduce electrical consumption and demand.
- Integrate high-efficiency modular electric boilers for primary space heating demands.

Equipment

- The procurement of equipment shall consider ENERGY STAR Certified products whenever applicable to decrease equipment/plug-loads.
- Further investigate fluid-based heat-recovery systems for snow-melt opportunities to improve safety of occupants and minimize environmental concerns with snow melt compounds.

Water

- Specify fixtures that in aggregate use a minimum of 20 percent less potable water than the indoor water use baseline calculated for the building. This will result in less heating demand with hot-water preparation.

Renewables

- Commission a 678_{kWDC} photovoltaic array system (spread across all Parcels) that can generate up to 1,100,000 kWh annually of renewable energy.
- Feed up to 50 tons/yr of organic waste input into a modular micro-anaerobic digester where the output, renewable biogas, will be converted to electricity through the use of a generator that will power electric vehicle charging stations in the parking garage (up to 14,200 kWh/yr of electricity can be generated). Note that this technology is still under evaluation with an on-going feasibility analysis led by PEG.

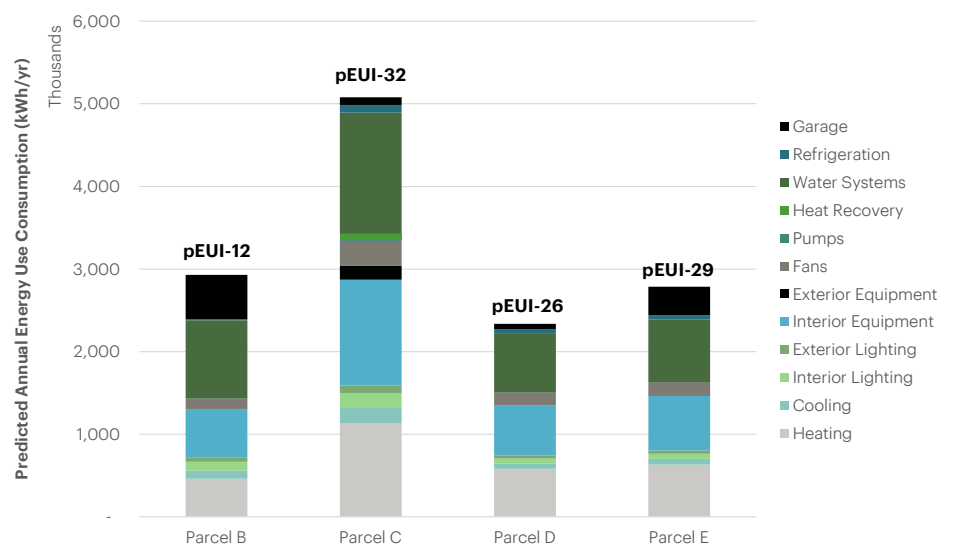


Figure 6 - PC BMP Parcel Energy End Use Breakdown and Predicted Energy Use Intensity

Electric Vehicle Charging Stations

To support Resolution 28-2017/32-2018 Scope 3 (transportation) emission reductions, PEG will install 10 Electric Vehicle Charging Stations within each parking garage with accommodations for ADA accessibility. This will include an additional 65 stalls that will be EV ready where conduit will be routed to appropriately sized panels (no wiring). This will avoid any material waste associated with future electric vehicle supply equipment (EVSE) requirements and desired Levels of charging.

Monitoring & Verification Efficiency

ENERGY STAR

The intent of Monitoring & Verification for the PC BMP is to provide greater transparency to how the performance goals aforementioned are being achieved. Utilizing ENERGY STAR Portfolio Manager (or similar energy management tool, TBD) will provide an interactive energy management tool for the PC BMP to track/account for whole-building energy use, water and waste on all Parcels and to support post-occupancy data collection requirement to ensure building performance alignment to Resolution 28-2017/32-2018. EPA's ENERGY STAR Portfolio Manager is a no-cost, interactive energy management tool that allows you to securely track and assess energy and water consumption.

Primary utility meters will interconnect for automatic reporting into Portfolio Manager for seamless benchmarking. Renewable Energy Certificates purchases will be tracked within Portfolio Manager to ensure that REC-ZEB is achieved on an annual basis. Should Parcels exceed EPA's performance threshold for superior energy performance (an ENERGY STAR score of 75 or higher), the PC BMP will consider applying for ENERGY STAR Certification. ENERGY STAR is a voluntary U.S. Environmental Protection Agency (EPA) program that helps businesses and individuals protect the environment through superior energy performance.

Commissioning

A commissioning plan shall be developed to support the design, construction, and operation of the Park City Base Development. In addition, a Measurement & Verification Plan will be developed to benchmark performance, compare back to design (energy model), and create feedback loop to inform decisions that will improve energy efficiency over time (in-operation).

On-site Energy Production



To reduce the environmental and economic harms associated with fossil fuel energy consumption, the Park City Base Development intends on continually evaluating the on-site renewable energy requirements of achieving Net Zero Energy for the parking program on each Parcel (excludes EVCS energy demands). In support of the Renewable Energy strategy for Park City our on-site energy production strategy is a combination of commissioning on-site renewable energy systems, including photovoltaic arrays and a modular micro-anaerobic digester, and purchasing Renewable Energy Credits (RECs) to meet the REC-ZEB definition.

Photovoltaics

The estimated energy requirements for all Parcels (parking) is approximately 1,100,000 kWh annually. A 678 kW_{DC} photovoltaic array (33,906 ft² or ¾ of an acre) would need to be commissioned to support the annual energy demands of the parking garage (see Figure 7). The on-site renewable energy generated would be equivalent to the emissions from 168 passenger vehicles driven for one year or 90 homes' energy use for one year.

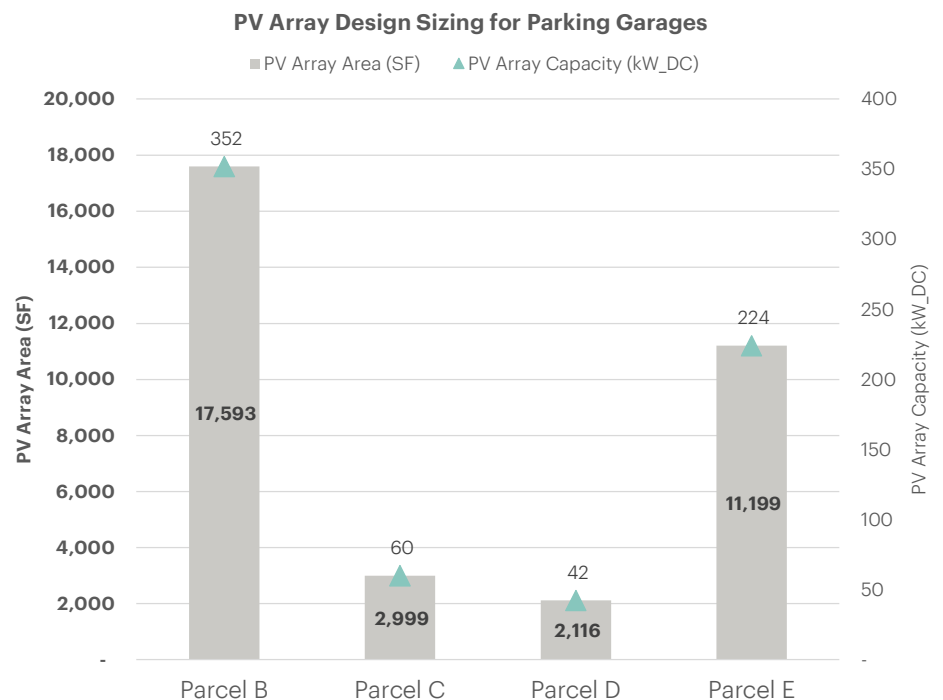


Figure 7 - PC BMP On-site Photovoltaic Arrays

To meet the Community REC-ZEB definition, the Park City Base Development will supply up to 8% of the site's energy demands with on-site renewable energy and purchase Renewable Energy Credits for the remainder of delivered energy to the site. Allocating roof areas not utilized for photovoltaic panels at initial construction to be PV ready so that additional panels can be installed in the future.

Parcel roof areas will be reserved to integrate on-site photovoltaic arrays to supply up to 8% of the site's energy demands. Areas not utilized will be planned to be PV ready so that additional panels can be installed in the future to further reduce the electrical demands and consumption of the Park City Base Development.

Modular Micro-Anaerobic Digester

We are currently evaluating the feasibility of integrating modular micro-anaerobic digester that positions itself as a local environmental impact asset and catalyst that generates on-site renewable energy (biogas) and liquid fertilizer amendment from organic food waste material while minimizing emissions associated with landfill and transport. The use of this technology could be coupled either with a reciprocating engine that could generate clean renewable electrical energy from the biogas or with a fuel-cell that can not only generate the same electrical energy but could recover heat that could be utilized as pre-heat either to kitchen hot-water preparation needs or to the hydronic snow-melt system. Given the site constraints, the modular micro-anaerobic digester would likely be located within the below grade parking garage where access to the food services could be provided as well as close proximity to the electric vehicle charging stations. The clean renewable electric energy generated (either from the reciprocating engine or fuel cell) could power and charge electric vehicles thereby converting waste into energy and transportation (zero emission charging).



Figure 8 - Impact Bioenergy HORSE AD25 Series Modular Micro-Anaerobic Digester System (Example)

Based on the Hotel food service waste generation, up to 50 tons/yr of organic waste input into can be fed into a modular micro-anaerobic digester where the output, renewable biogas, will be converted to electricity up to 14,200 kWh/yr annually. The standard EV batter requires 30 kWh per 100 miles. Therefore, the modular micro-anaerobic digester could fully charge up to 240 vehicles annually.

PEG is currently undergoing a feasibility analysis with Impact Bioenergy and their High-solids Organic-waste Recycling System with Electrical Output (HORSE) AD25 Series modular micro-anaerobic digester system. Additionally, there have been some conversations with partnering with Vail Resorts to divert some waste streams into the PC BMP digester.



Figure 9 - Impact Bioenergy Modular Micro-Anaerobic Digester System Process Flow (Example)

Partnerships and Programs

Utah CPACE

PEG is considering engaging the Utah C-PACE government-sponsored program to leverage innovative financing to achieve higher building performance improvements (ECMs) with those already considered and those that will be further explored during the design and engineering of the PC BMP.

Rocky Mountain Power

PEG will be exploring various incentive programs available through Rocky Mountain Power.

To encourage clean transportation adoption and to improve Park City's air quality, the electric vehicle charging station incentive program through Rocky Mountain Power (if still available at the time of construction) will be pursued in hopes of off-setting costs of the planned EVCS and possibly adding in additional charging stations (if budgeting allows).

Renewable Energy Credits are integral to achieve REC-ZEB for the PC BMP. Therefore, PEG will be exploring opportunities with Rocky Mountain Power's *Blue Sky* business partner program or similar to reduce the environmental impacts associated with electricity use prior to Park City being supplied with 100% renewable energy.

Rocky Mountain Power's *Wattsmart* Large Business program will help assist upgrading the PC BMP with energy efficiency and deliver desired ROI targets. PEG will be exploring both common upgrades in the Utah program as well as the Custom Analysis program to engage energy experts to further evaluate options during design.

Given that the PC BMP site is not large enough to accommodate all the on-site renewable energy required, PEG will be engaging Rocky Mountain Power in available electric service schedules specific for qualified customers who have a electrical load over 5,000 kW (Schedule No. 34). This will immediately assist with increasing the amount of renewable energy locally generated to be purchased by PEG for the PC BMP.





Tommy Zakrzewski

Director of Building Engineering Physics

PHD, BEMP, CEM, CMVP, LEED O+M, LEED BD+C AP

125 S. Clark Street, #1100

Chicago, IL 60603

+1 312 262 9764 **direct**

tzakrzewski@hksinc.com

www.hksinc.com

Exhibit B: Draft Sustainability Focused Finding of Fact and Conditions of Approval for Planning Commission Consideration

Findings of Fact

1. The City has ambitious but achievable climate goals to be net zero carbon and to meet annual electricity needs through 100% renewable resources for the entire community by 2030, as embodied in [Resolution 32-2018](#) (the “City’s Sustainability Goals”).
2. The project will add to the City’s overall energy demand and carbon footprint, and the applicant submitted Sustainability Guidelines, dated December 1, 2020 (as amended), detailing the applicant’s plan to ensure the project contributes to the City’s Sustainability Goals.
3. The Sustainability Guidelines target energy savings compared to the State of Utah’s currently adopted energy codes as of December 1, 2020 (i.e. IECC 2018) in excess of 20%, and include the applicant’s commitment to integrate energy modeling in the design process of all buildings and building types within the project in order to achieve that goal through the use of high-performance building envelopes and energy efficient mechanical, lighting, and window systems (core and shell).
4. The Sustainability Guidelines provide for the creation of a construction waste management plan and the diversion of construction and demolition materials away from landfills and incinerators, including diversion of 100% of demolished asphalt, and diversion of a minimum of 50% of construction waste into not less than four material streams.
5. The Sustainability Guidelines provide for the creation of a comprehensive waste management plan to reduce landfill waste that is generated by building occupants (commercial tenants as well as residential) and all buildings will include accommodations for recycling.
6. The Sustainability Guideline provide for a pEUI-25 average for the four (4) building parcels at full build-out. The targeted individual pEUI for the specific buildings are set forth in the Sustainability Guidelines.
7. The Sustainability Guidelines provide for the installation of rooftop photovoltaic arrays, as well as the potential for other on-site renewable energy generation methods such as micro-anaerobic digester for food waste, intended to supply not less than 8% of the project’s energy demands (including 100% of the energy demand for the project’s structured parking facilities), and the design and preparation of additional roof areas that will be “PV ready” so that additional panels can be installed in the future.
8. The Sustainability Guidelines provide for the applicant’s purchase of Renewable Energy Credits (“REC”) for each completed building in the project to offset

delivered [energy] to the Project that is not supported by on-site renewable energy systems, for a period equal to the lesser of: (a) five (5) years; or (b) the number of years from the date the final Certificate of Occupancy is issued for the applicable building and the estimated date that the City's fully renewable power source will be on line (currently estimated to be 2030).

9. The Sustainability Guidelines provide for rigorous energy commissioning for each building to support the energy efficient operation of such buildings and to compare performance back to modeled design targets.
10. The Sustainability Guidelines provide for applicant's use of management tools to log, track and verify building performance including [energy] consumption, indoor and outdoor water usage and recording the REC purchases applicable to each building.
11. Based on the above, and the items set forth in the Sustainability Guidelines, the Planning Commission finds that the applicant's project and Sustainability Guidelines incorporates best planning practices for sustainable development, including water conservation measures and energy efficient design and construction, per the ~~Residential and Commercial Energy and Green Building program and codes adopted by the Park City Building Department~~ in effect at the ~~time of the current Application~~ as of December 1, 2020 (i.e. IECC 2018).

Conditions of Approval

1. The applicant shall comply with the City's EV requirements, as outlined in LMC Section 15-3-11, Electric Vehicle Charging Stations.
2. The applicant shall comply with the City's (soon to be adopted) Dark Sky Ordinance, Ordinance No. 2020-XX.
3. The applicant shall submit a construction waste management plan to the City's Planning and Sustainability Department for approval/denial pursuant to the standards herein prior to commencement of any demolition or construction at the project, which plan shall identify the manner in which applicant shall log, report, and achieve a minimum diversion rate of 100% for demolished asphalt, and a minimum diversion rate of 50% of construction waste into not less than four material streams with an average stretch goal of 75%. From and after commencement of demolition or construction and throughout any demolition or construction process, the applicant shall submit quarterly reports to the City's Planning and Sustainability Departments demonstrating the applicant's compliance with the construction waste management plan.
4. Prior to issuance of a building permit for a particular building, the applicant shall submit a detailed energy model report and standard outputs to the City's Planning and Sustainability Departments for approval/denial pursuant to the standards herein for such building showing how the building is expected to meet

the intended [energy] targets and pEUI goals. The applicant may, at its election, submit detailed energy model reports and standard outputs for “building types” that may be utilized to satisfy this condition for one or more buildings in the project that are of the type modeled in the general model submitted.

5. Included with applications for building permits, the applicant shall submit building plans demonstrating at least a 20% energy savings for each building and/or building type compared to the State’s currently adopted energy code (i.e. IECC 2018) and the use of high-performance building envelopes and mechanical, lighting, and/or window systems designed to accomplish such savings.
6. For the first two years after receiving a certificate of occupancy for a given building, the applicant shall submit or cause to be submitted energy performance information for such building to the City’s Planning and Sustainability Departments demonstrating actual building performance measured against the building performance goals for that building. Performance indicators shall include energy consumption, verification of on-site renewable energy generation, water consumption, waste management, and the targeted individual pEUI for the specific building. The applicant will meet with the City’s Planning and Sustainability Departments within 30 days of these annual submissions and shall take operational actions to correct noted deficiencies. Verification pathways include Energy Star Portfolio Manager or a similarly appropriate energy management programs.
7. The applicant shall purchase Renewable Energy Credits (“REC”) for each completed building in the project. The RECs shall be used to offset delivered [energy] to the project that is not supported by on-site renewable energy systems for a period equal to the lesser of: (a) five (5) years; or (b) the number of years from the date the final certificate of occupancy is issued for the applicable building and the estimated date that the City’s fully renewable power source will be on line (currently estimated to be 2030). The number of RECs purchased for each completed building shall be equal to the difference between the anticipated energy demand for a given building minus the anticipated on-site energy production attributable to such building. REC accounting shall be submitted to the City for the first five years of occupancy on an annual basis for compliance with this Condition.
8. The applicant shall install and commission at least a 678KW photovoltaic array for the entire project, which array shall be constructed on a phased basis in connection with the completion of the building[s] upon which the array is located. The applicant shall also design the applicable building electrical systems so as to accommodate additional on-site photovoltaic arrays if deemed appropriate by the applicant.

9. If the applicant installs a modular micro-anaerobic digester, the applicant shall cause all commercial food service operators within the Project to utilize the digester for the processing of food wastes. In addition, on-site renewable energy generated by the digester shall be incorporated into the project such that biogas and liquid fertilizer amendments are, to the degree possible, utilized on-site.
10. All mechanical systems (where such energy ratings are available) and appliances installed in the project shall be Energy Star (or similarly rated) and must demonstrate above-standard energy performance, and be right sized for appropriate end-use.
11. All plumbing fixtures installed in the residential elements of the project shall be WaterSense (or similarly rated) to meet the EPA criteria as low-flow fixtures and reduce the water consumption of the project.
12. The applicant shall employ best management practices for stormwater filtration in the project to increase the quality and decrease the quantity of stormwater runoff from the project.
13. The applicant will utilize Waterwise landscaping as defined in the LMC, and irrigation techniques to decrease water consumption within the project.

NICOLE M. DEFORGE

Direct Dial: 801.574.2620

NDEFORGE@FABIANVANCOTT.COM

November 17, 2020

VIA E-MAIL (planning@parkcity.org)

Park City Planning Commission
P.O. Box 1480
Park City UT 84060

Re: Park City Mountain Base Area Development—MPD Modification

Dear Commissioners and Staff:

I am writing on behalf of the community group, Responsible Resort Area Development ("RRAD"), a non-profit organization comprised of dozens of Park City residents, business owners, and home owners.

RRAD is still reviewing the revised plans for Parcel B recently submitted by the developer, as well as its November 13, 2020 letter attempting to justify building height and setback variance requests. However, RRAD wishes to raise a number of preliminary issues now with respect to both the letter and the plans in advance of the November 18 Planning Commission meeting.

The developer is requesting a variance on building height limitations for every parcel in the project. Instead of complying with the 35-foot maximums required in the LMC, developer is requesting approval of building heights double and triple those allowed under the LMC. The developer is also requesting setback reductions that are obviously not necessary to provide desired architectural interest and variation. And contrary to the developer's representations, the newly submitted designs for Parcel B clearly show setback reductions below the 20-foot perimeter setback required for underlying zoning. The Planning Commission cannot grant such setback reductions as a matter of law.

It is very apparent from the developer's November 13 letter and revised plans for Parcel B that the only reason for the requested variances on building heights and setbacks is to squeeze more square footage and parking spaces onto each parcel. That is not a proper legal basis for either the requested setback reductions or for building heights that greatly exceed what is allowed in the underlying zone and even what was approved in the 1998 CMP. The developer cannot to justify the variances with after-the-fact excuses that are largely irrelevant to the legal standard.

ATTORNEYS AT LAW

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Salt Lake City, UT 84111-2323
Tel: 801.531.8900 Fax: 801.596.2814
www.fabianvancott.com

Excessive Building Heights

The developer has not demonstrated compliance with the requirements of LMC 15-6-5(F) to allow the developer to greatly exceed building height limitations in the LMC and the Development Agreement.

No increased square footage/volume: The developer erroneously claims that "the proposal does not increase the square footage or building volume allowed under the Development Agreement." That is false. The overall project square footage exceeds what was approved under the Development Agreement. Three of the parcels also exceed what was approved under the Development Agreement: Parcel B exceeds approved square footage by 58,012 square feet; Parcel C exceeds approved square footage by 18,102 square feet; and Parcel D exceeds approved square footage by 7,095 square feet. The Development Agreement prohibits reallocation of density from other parcels to offset those increases, as the developer is attempting to do here.

The developer also curiously argues that building height variances are somehow justified because it has included affordable housing within the project. That is irrelevant under LMC 15-6-5(F). An applicant must comply with affordable housing requirements as a condition for approval; that compliance does not warrant setback reductions. Furthermore, inclusion of the affordable housing on-site is a direct violation of the Development Agreement.

Provides desired architectural variation: The developer makes no attempt to meet its burden of showing that the building height variances meet this condition.

Minimize visual impacts on adjacent structures: The developer only addresses the Parcel B buildings and ignores the fact that every single parcel on the site exceeds maximum building height requirements by 2-3 times. Even with respect to the new design for Parcel B, placing townhouses along the perimeter is not remotely sufficient to minimize the visual impacts of an eight-story building immediately adjacent to one- and two-story single-family homes. The street view from Empire Avenue in the new renderings provides an apt visual of just how massive and monolithic the building is on this parcel in marked contrast to the broken-up cluster of residential buildings required under the Development Agreement.

Mitigate problems on neighboring properties caused by shadows, etc.: The developer has made no attempt to satisfy its legal burden of showing that it has met this requirement. Merely stating that it is "not aware of any negative shadow impacts" is not enough.

Adequate landscaping and buffering: The landscaping plans are too preliminary to determine whether this condition is met.

Increased setbacks and separations from adjacent projects are proposed: The developer wrongly assumes that "adjacent" means only abutting properties and consequently addressed just three locations. The term "adjacent" is far broader than that and encompasses all neighboring properties. The developer has not proposed increased setbacks or separations from any of those adjacent properties. To the contrary, it has requested reduced setbacks for virtually all of the buildings, although Parcel B is the most egregious. This condition is clearly not met.

Additional building height results in more than the minimum open space and more publicly accessible open space: Despite demanding considerably greater building heights than in the original CMP, the developer has not proposed any material increase in open space in its latest plans. With respect to Parcel B, the developer has removed *all* of the open space except for a green strip around the perimeter, including the critical 14th Street view corridor and pedestrian access through the block. Even a cursory glance at the CMP reveals a far more open development with light and space between a clustering of smaller, individual buildings. The developer has failed to show that the greatly excessive building heights in its current plans are justified by any increase in open space.

Provides a transition in roof elements: The developer has failed to show the requisite transition in roof elements required by the Development Agreement. For example, the Development Agreement provides as follows: "The roof steps, for example, are a significant design element that cannot be substantively changed without demonstrating that any alternate design has no additional adverse massing and/or significant shadow impacts." The current plans are not remotely similar to the original CMP or the roof steps reflected there. Although the design of the roofs varies somewhat, the roof transitions are substantively different than the roof steps required in the Development Agreement. The developer has made no showing that this material deviation does not result in additional adverse massing or significant shadow impacts.

In addition to its failure to show LMC compliance, the developer has also failed to demonstrate compliance with the building height requirements in the Development Agreement, a sampling of which follows:

- "Building heights shall step up from major roadways, public plazas and neighboring projects with higher buildings placed closest to the mountain backdrop."
- "The overall building volumes shall be broken up and stepped both in plan and elevation."
- "Buildings shall be sited, massed and comply with the height in the approved Master Plan documents."
- "Any proposal to change building envelopes, heights, or massing must demonstrate that the resultant patterns are comparable to those shown in the Master Plan. The roof steps, for example, are a significant design element that cannot be substantively changed without demonstrating that any alternate design has no additional adverse massing and/or significant shadow impacts."
- "Building heights represent a maximum."

The current plans breach all of these requirements in the Development Agreement.

Setback Reductions

The developer also has not demonstrated compliance with Section 15-6-6(C) in requesting setback reductions. Setback reductions are only permitted if "necessary to provide desired architectural interest and variation." Even then, they can only be reduced to the "zone-required Setback," which in this case is 20 feet around the perimeter.

First, the revised plans submitted by the developer for Parcel B clearly show that the setbacks are much less than 20 feet in places on every level of the eight-story building and on three sides of the perimeter. For example: On Level 01 and 02, the northwest and southwest corners of the building exceed the claimed setback. On Level 02 and 03, all of the residential units exceed the claimed setback on Shadow Ridge. On Level 03, the northwest corner of the building again encroaches and the parking stalls on west side encroach almost to the property line on Lowell Avenue. On Level 04, the residential units exceed setbacks on Shadow Ridge. On Level 05 and 06, the decks on Shadow Ridge and the overhangs on Lowell exceed setbacks. On Level 07, 08, and 09, the building exceeds setbacks along Shadow Ridge, and the roof overhang on Empire Avenue appears to greatly exceed the permitted roof overhang allowances. The Planning Commission has no legal authority to grant such setback reductions at all because they do not comply with underlying zoning.

Second, the requested setback reductions are not necessary to provide desired architectural interest and variation, as mandated in the LMC. To the contrary, they are necessary only because the developer has designed to the reduced setbacks in order to cram as much square footage and parking as it can on each parcel. The reduced setbacks are most certainly not needed for, or even the result of, desired architectural interest or variation.

The developer's arguments as to why the reduced setbacks meet the LMC legal requirements are merely pretext and largely irrelevant. For example, it argues that reduced setbacks are necessary for "promoting public access and four-season viability for the project," for "consolidation and clustering of the base area development on Parcels A through D," and to "accommodate the approved development density, development clustering, on-site affordable housing and open space preservation." None of that, even if true, justifies reduced setbacks under the LMC. Equally irrelevant is the developer's claim that "the average setback proposed for the entire project or village core far exceeds the 25-foot minimum." And the developer's argument that setback reductions are allowed simply because the project has architectural variation reads the requirements of necessity out of the ordinance.

The developer's statement that it has "pulled the parking structure all the way back to a 20-foot setback line on the west side" is also misleading. The developer has merely shifted the entire parking portion of the Parcel B building to the west and then added tandem parking spaces along Lowell that go nearly to the property line. These parking spaces therefore do not even comply with the minimum 20-foot setbacks required in the underlying zoning. And the revised plans resulted in a loss of 48 day-skier parking spaces.

The developer also seems to suggest that setbacks reductions must be allowed in order for it comply with all of its legal requirements under the LMC while maximizing its density entitlements for the project. In other words, it is arguing that it cannot be expected to comply

with the LMC unless it gets setback reductions. Again, that is not what the ordinance says. And if that were the standard, then virtually all developers could claim setback reductions.

In short, the developer has failed to show that its request for increased building heights and reduced setbacks complies with the LMC or the Development Agreement. The Planning Commission must therefore deny the developer's request.

Thank you for your consideration of RRAD's concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole", with a stylized flourish at the end.

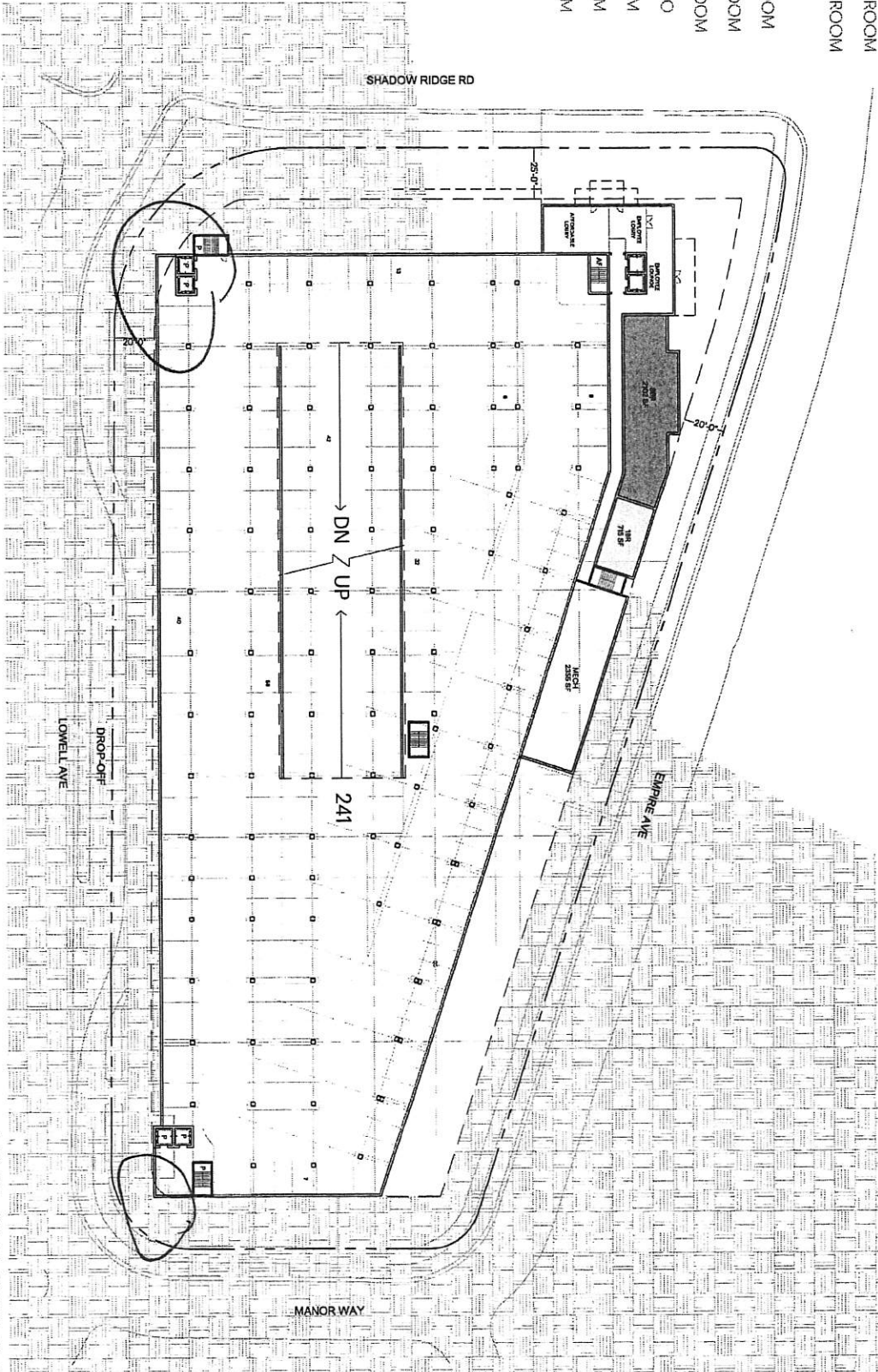
Nicole M. Deforge

cc: client; alexandra.ananth@parkcity.org; bruce.erickson@parkcity.org

4830-7811-5755, v. 1

KEY

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	AFFORDABLE - 2 BEDROOM
	BOH
	EMPLOYEE - 1 BEDROOM
	EMPLOYEE - 2 BEDROOM
	EMPLOYEE - 3 BEDROOM
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	CONDO - 2 BEDROOM
	CONDO - 3 BEDROOM
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	CONDO AMENITY

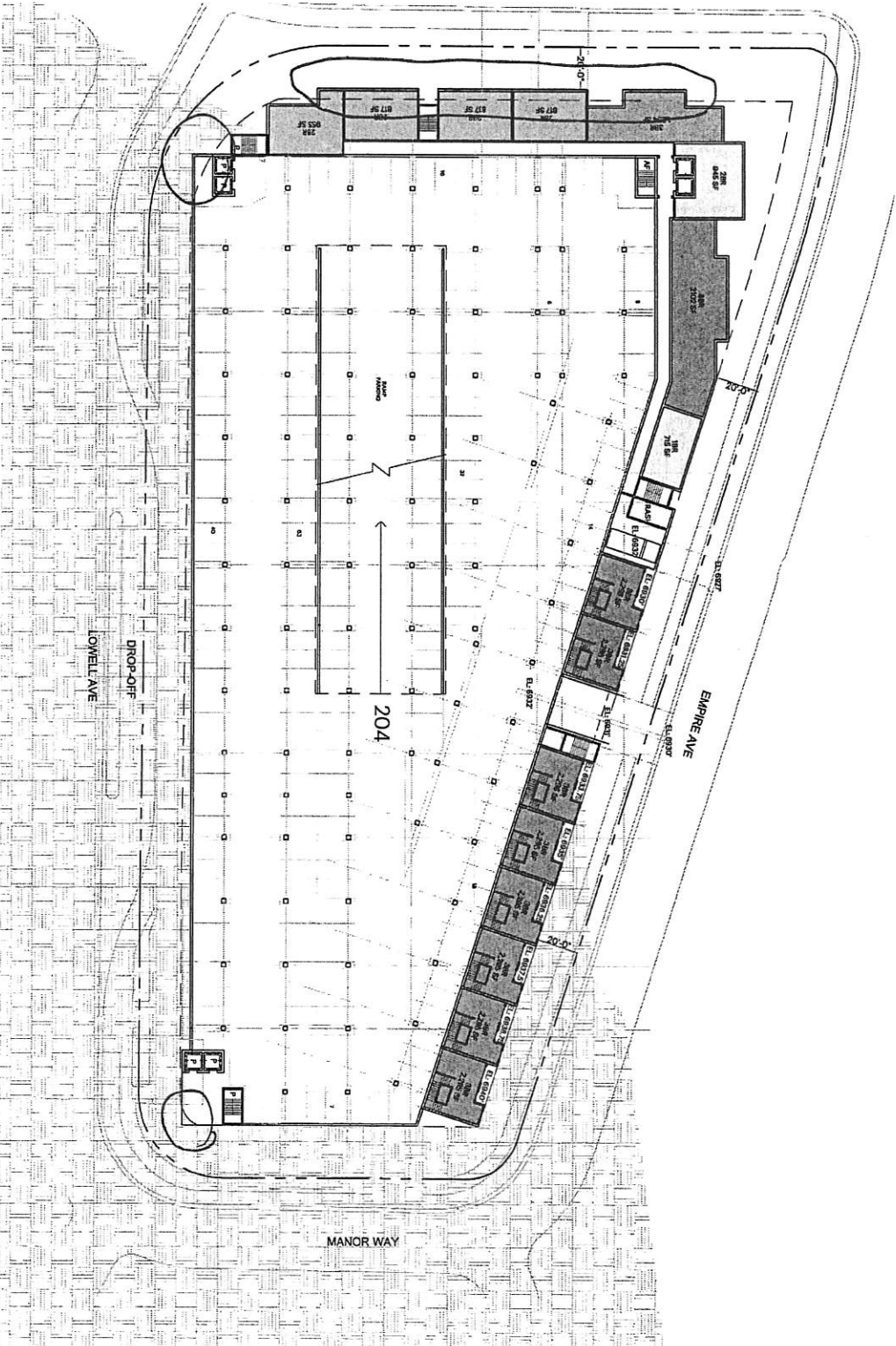


LEVEL 01 FLOOR PLAN

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- EMPLOYEE - 3 BEDROOM
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- CONDO - 4 BEDROOM
- CONDO AMENITY

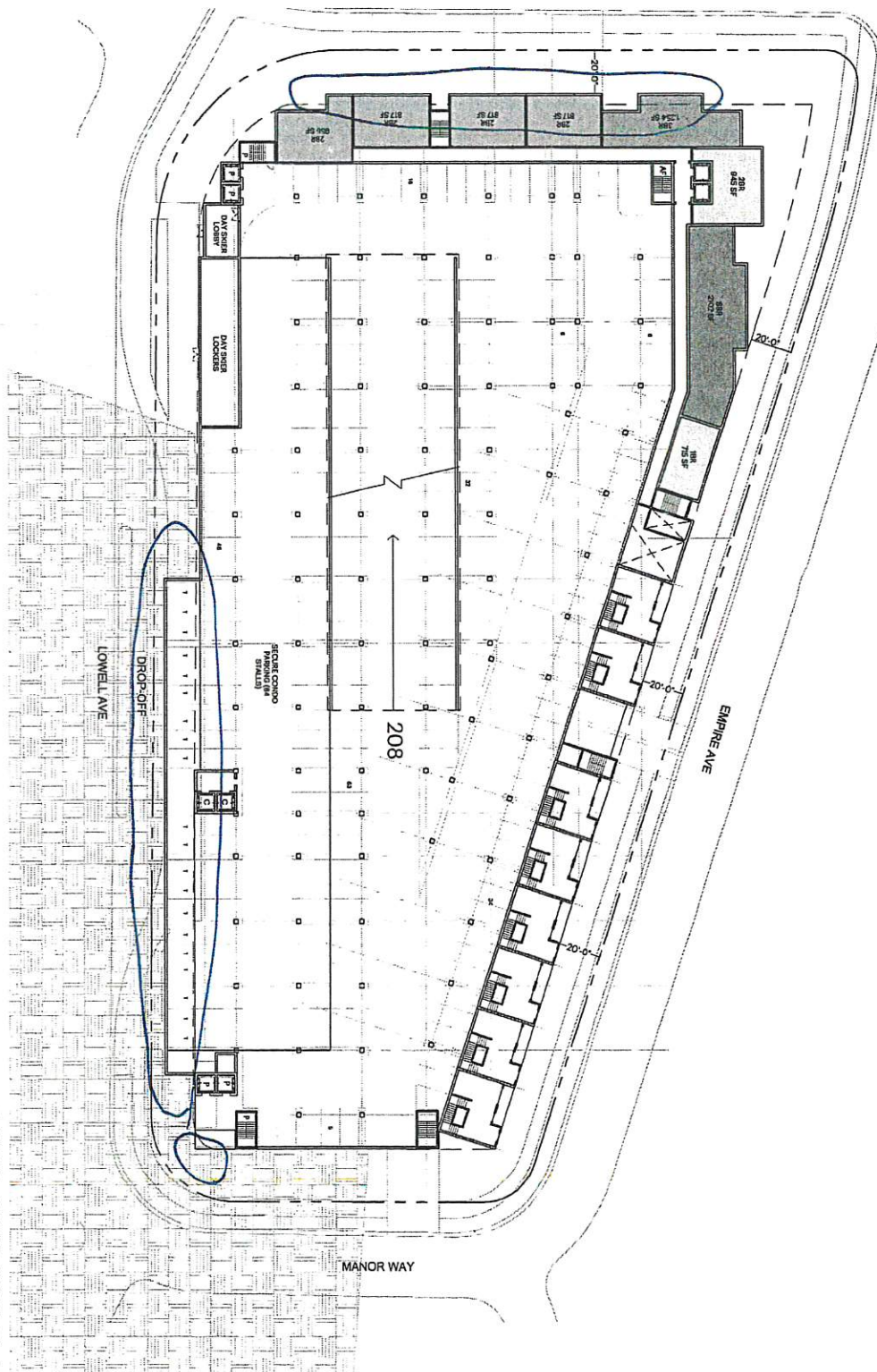


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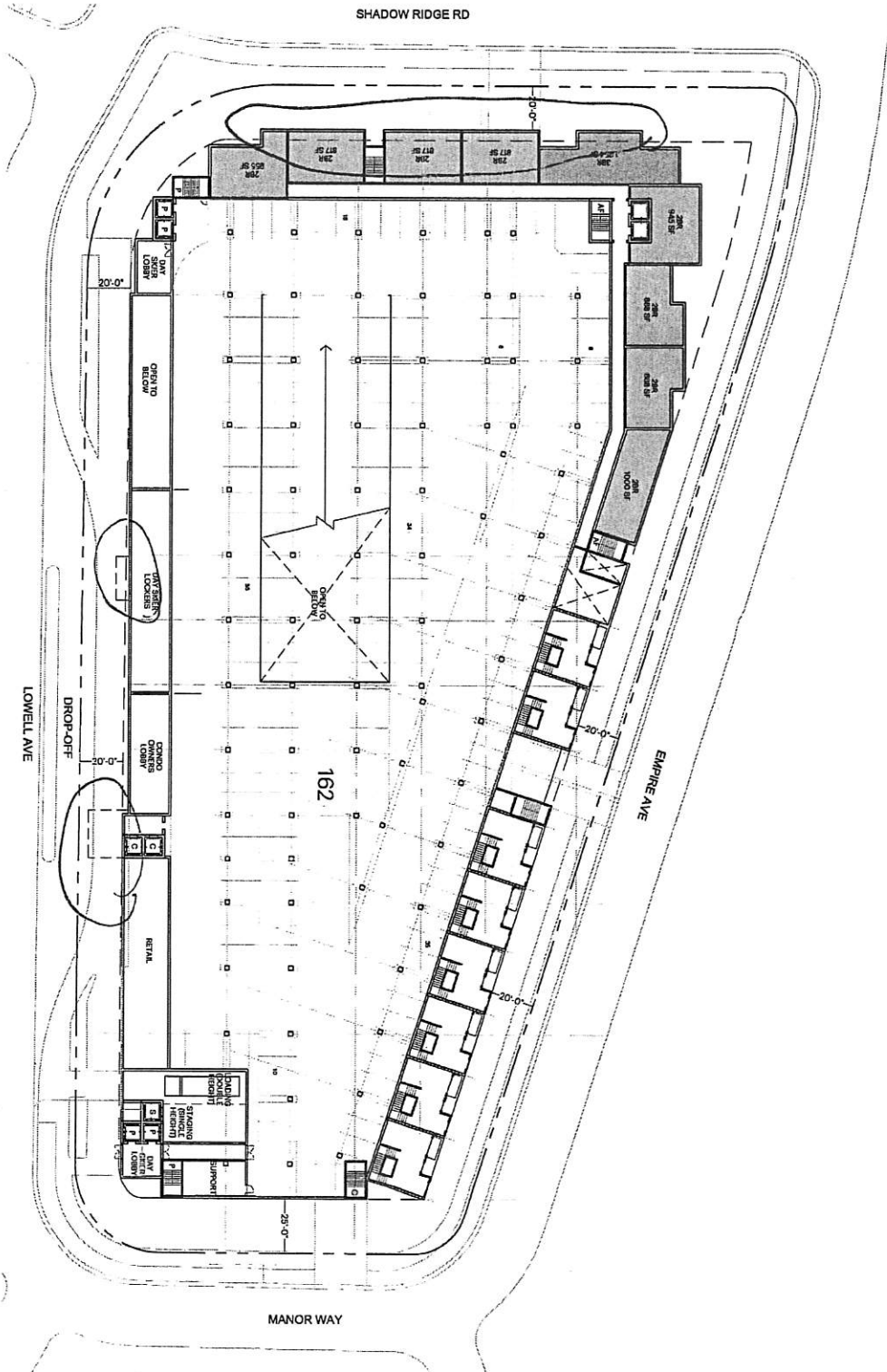
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 - EMPLOYEE - 3 BEDROOM
 - CONDO - 1 BR/STUDIO
 - CONDO - 2 BEDROOM
 - CONDO - 3 BEDROOM
 - CONDO - 4 BEDROOM
 - CONDO AMENITY

KEY

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	AFFORDABLE - 2 BEDROOM
	BOH
	EMPLOYEE - 1 BEDROOM
	EMPLOYEE - 2 BEDROOM
	EMPLOYEE - 3 BEDROOM
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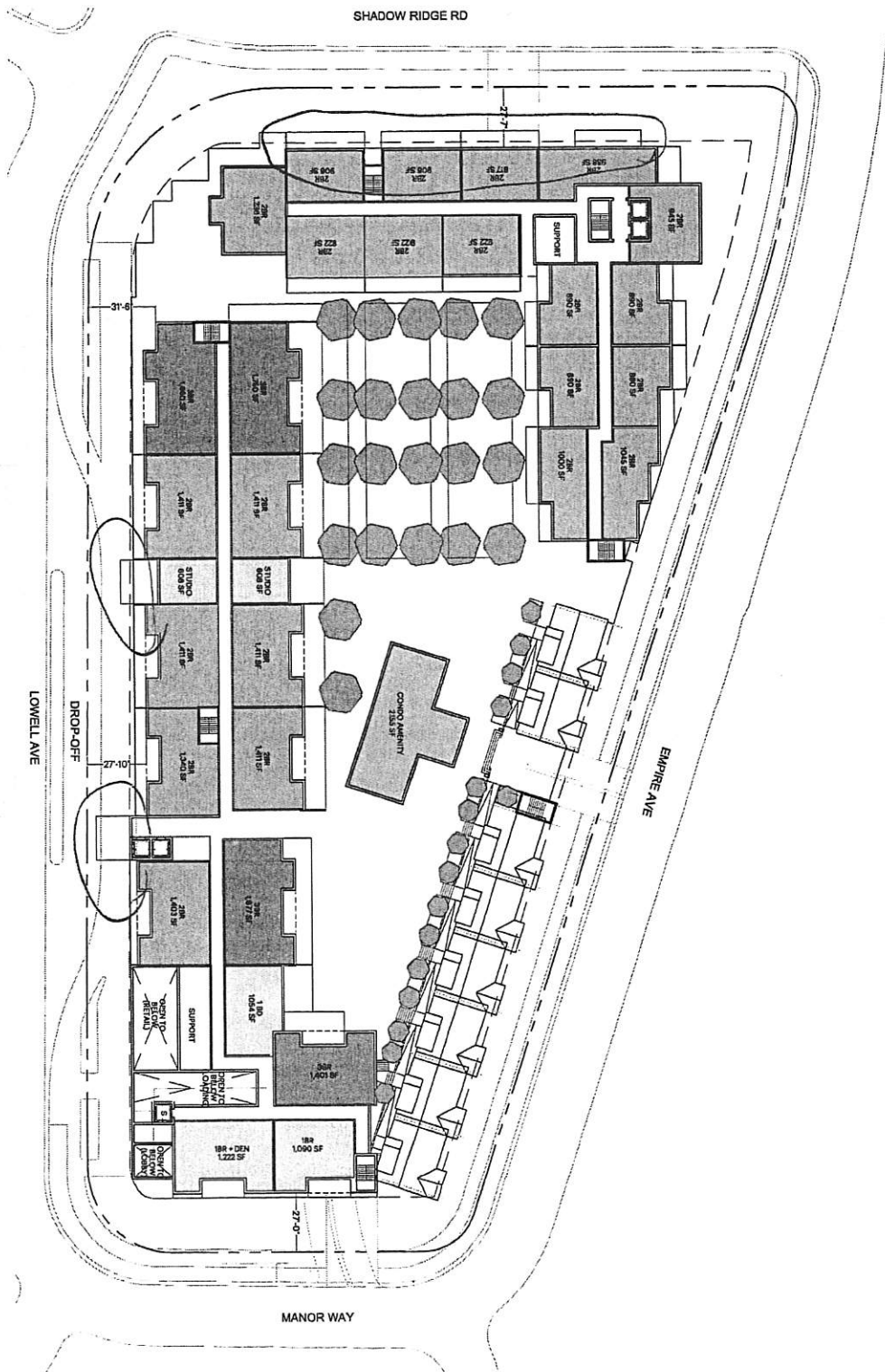
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- EMPLOYEE - 3 BEDROOM
- CONDO - 1 BR/STUDIO
- CONDO - 2 BEDROOM
- CONDO - 3 BEDROOM
- CONDO - 4 BEDROOM
- CONDO AMENITY

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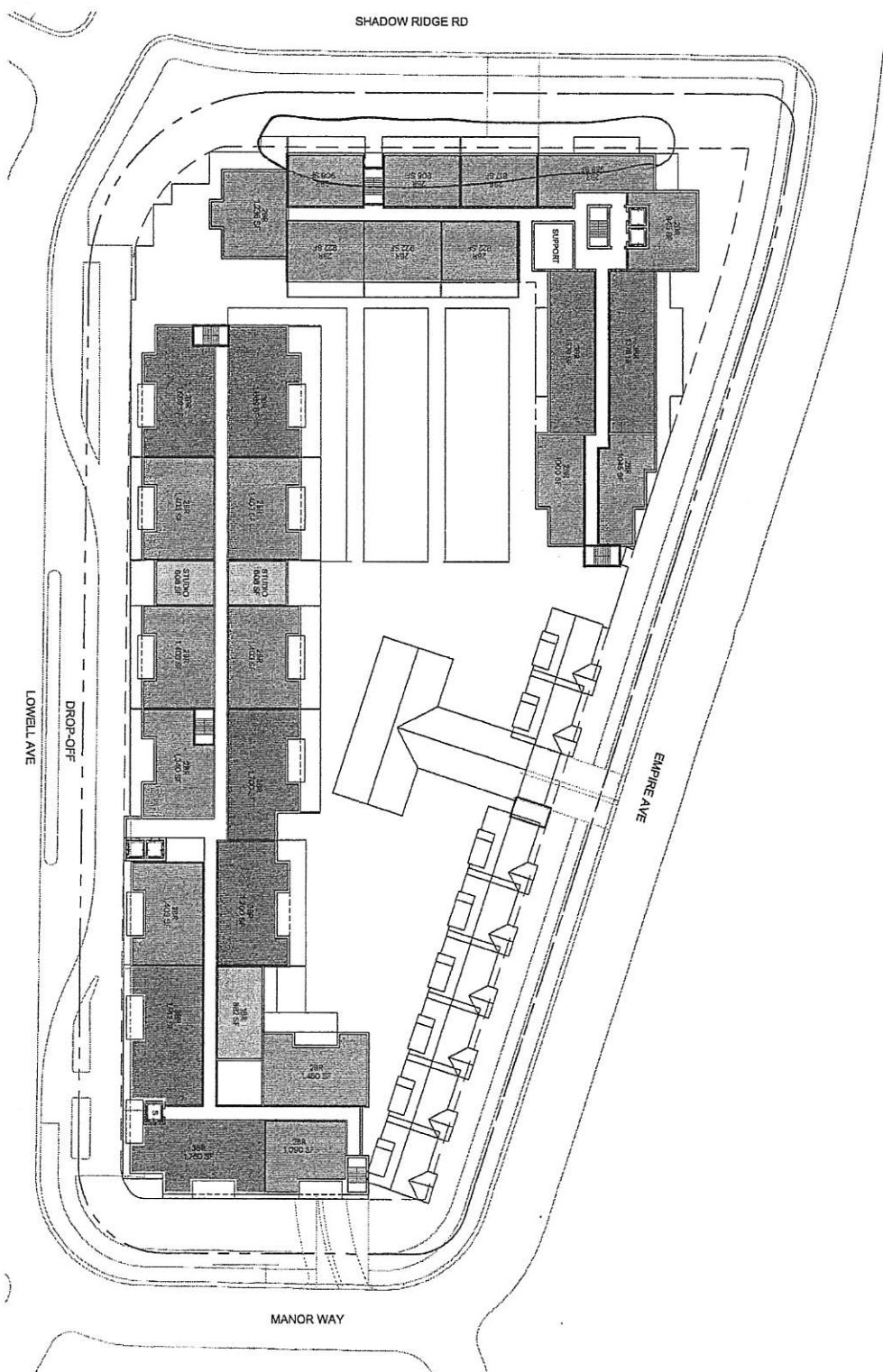


LEVEL 05 FLOOR PLAN

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|  | CONDO - 1 BR/STUDIO |
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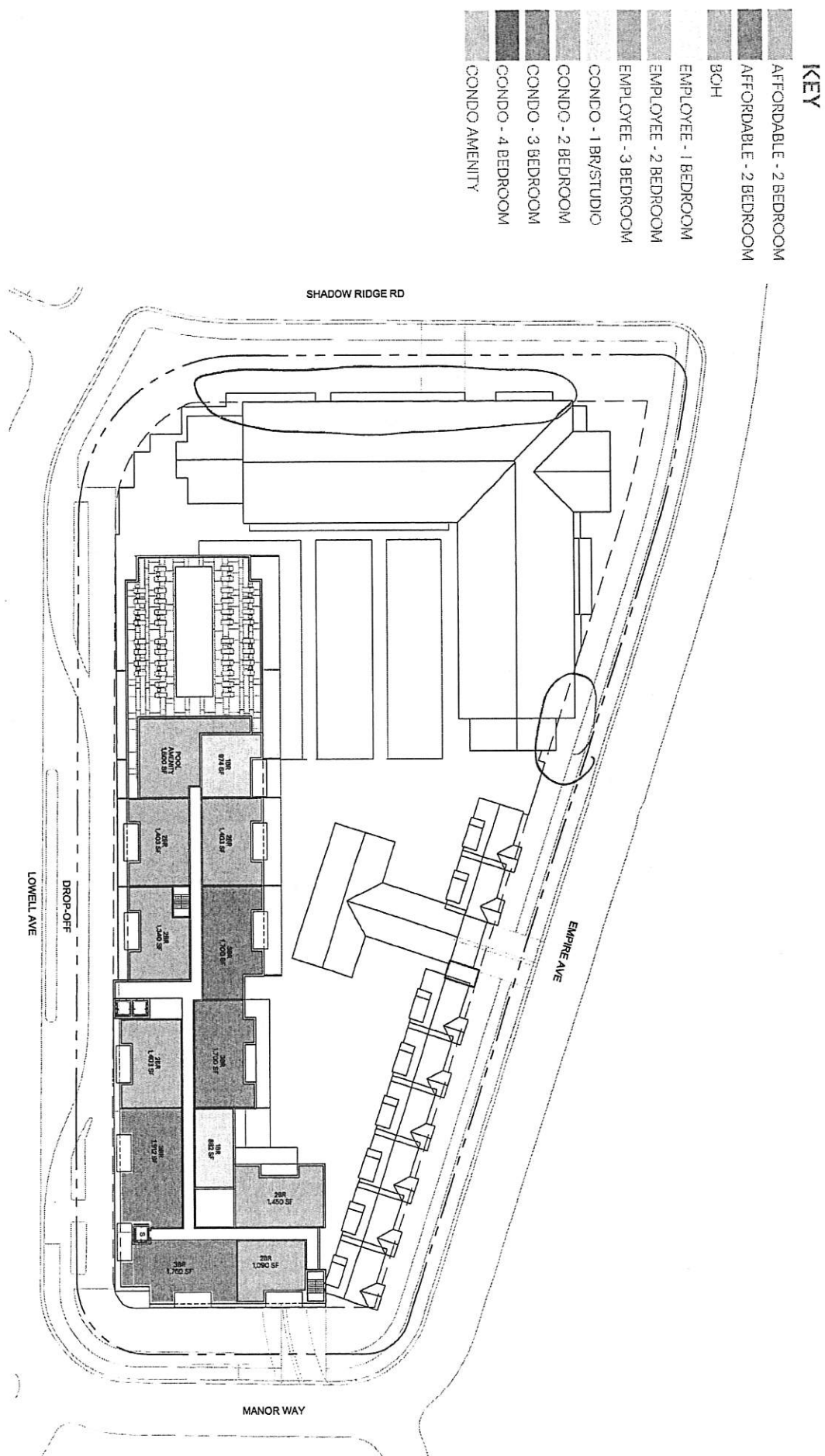
LEVEL 06 FLOOR PLAN





LEVEL 07 FLOOR PLAN

+6982

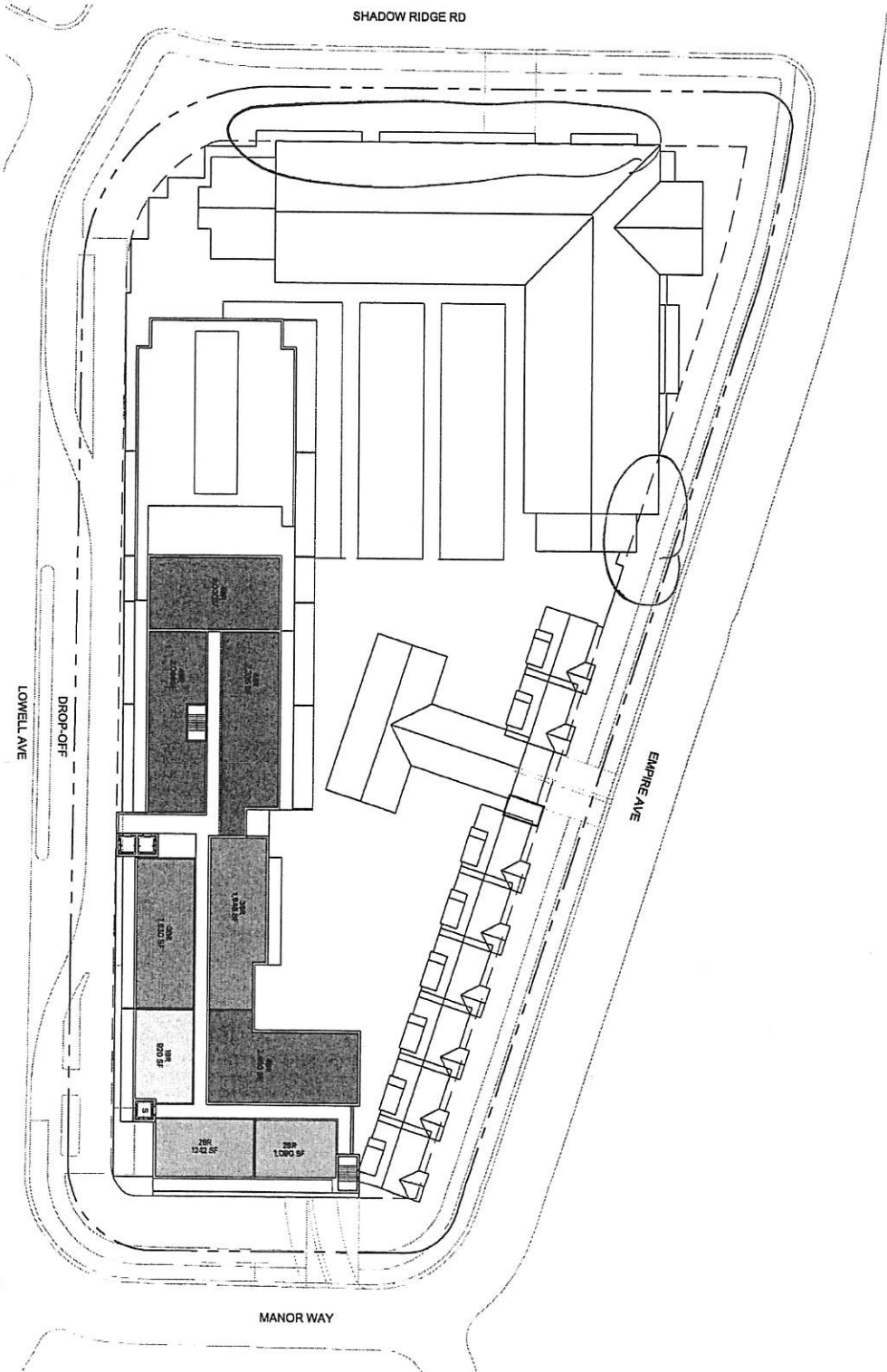




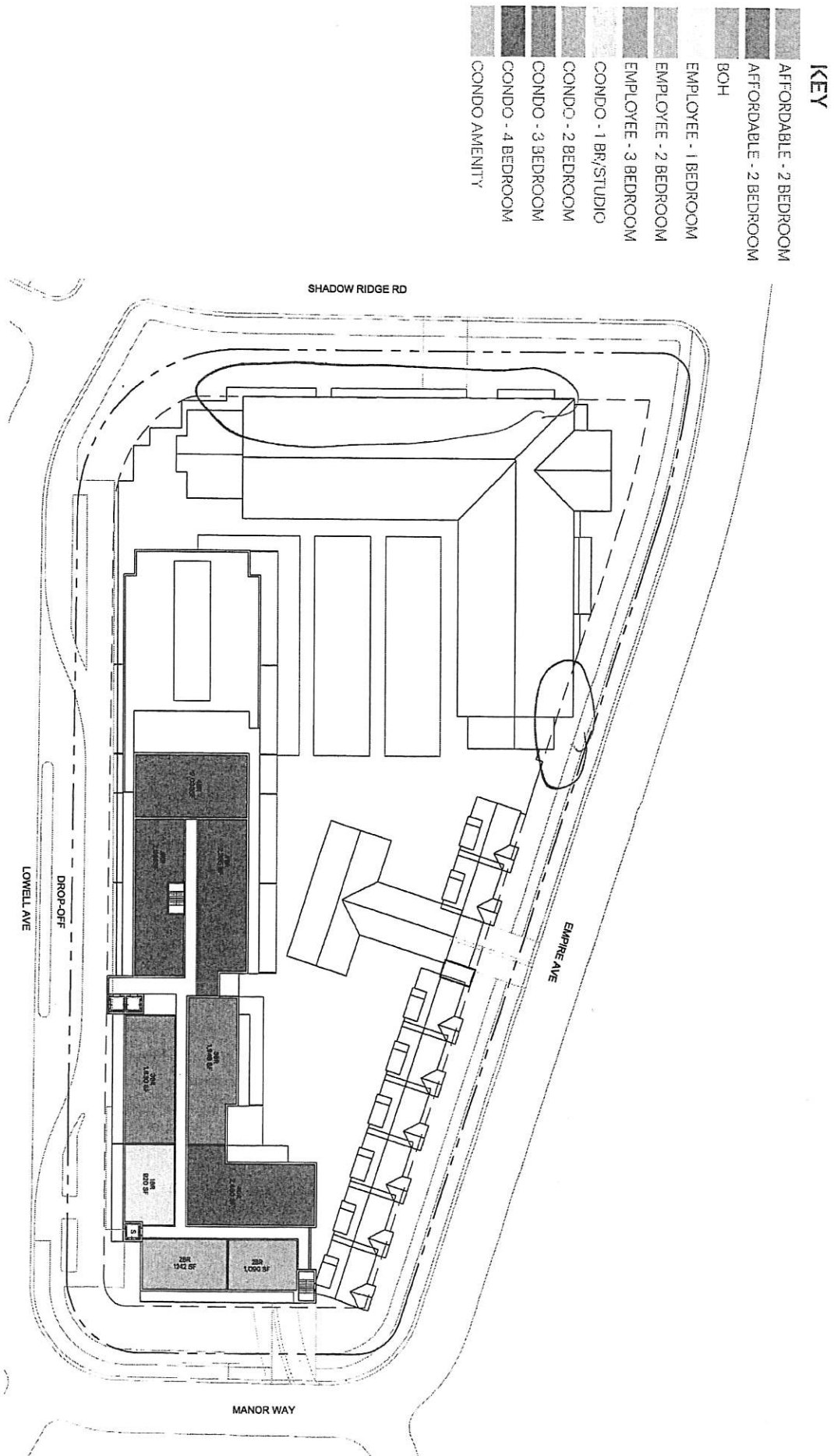
LEVEL 08 FLOOR PLAN

+6992

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 - EMPLOYEE - 2 BEDROOM
 - EMPLOYEE - 3 BEDROOM
 - CONDO - 1 BR/STUDIO
 - CONDO - 2 BEDROOM
 - CONDO - 3 BEDROOM
 - CONDO - 4 BEDROOM
 - CONDO AMENITY



LEVEL 09 FLOOR PLAN



Alexandra Ananth

From: dana williams <danawilliams7012@gmail.com>
Sent: Wednesday, November 18, 2020 8:59 AM
To: Alexandra Ananth
Subject: Resort area Development

Dear Alexandra and planning commission,

Wanted to show my support for the report that was submitted by our organization, RRAD. As someone who attended the 1998 meetings to develop the resort base, this current proposal does not come close to the community approve project. The current design's approach seems to be based on how much density can possibly be packed into the parking lot areas. I will keep this short, the project does not conform with the 1998 development agreement and should be denied.

Thank you,
Dana Williams

Sent from my iPad

Alexandra Ananth

From: planning
Sent: Wednesday, November 18, 2020 11:35 AM
To: Alexandra Ananth
Subject: FW: PC Base Area Development Issues

Jessica R. Nelson
Planning Analyst
She/Her/Hers
(435) 615-5061

Disclaimer: The Planning Department strives to give the best customer service possible and to respond to questions as accurately as possible based upon the information provided. However, answers given at the counter and/or prior to application are not binding and they are not a substitute for formal Final Action, which may only occur in response to a complete application to the Planning Department. Those relying on verbal input or preliminary written feedback do so at their own risk. Zoning and Land Management Code sections are subject to change.

-----Original Message-----

From: Glidefar [\[mailto:glidefar16@yahoo.com\]](mailto:glidefar16@yahoo.com)
Sent: Wednesday, November 18, 2020 11:10 AM
To: planning
Subject: PC Base Area Development Issues

Dear Planner Ananth and Planning Council:

Please read and include this letter in your November 18th. 2020 meeting regarding the development of the PC Base Area.

Thank you all for your efforts to date to review PEG's proposals.

I am interested to learn and request that you demonstrate how the present planning projects in Park City will be effected by the 2020 Vision Plan of Park City. Since great effort and expense was incurred to ask the residents of Park City how they would like their city to grow and be maintained, I believe it is essential to demonstrate how will this Vision report will apply specifically to the PEG development.

As a resident of the Silver King Condominiums, I would like to ask the Planners to also consider the residents and owners of properties at the Silver King and Shadow Ridge to be protected from the massive monolithic structures proposed by the PEG development. To date, only residential areas on Empire and Three Kings have been sited by the Plannning Commission as important considerations. Since the Covid Pandemic, more owners are choosing to live in their Base Area adjacent properties. Please don't assume that this is just commercial nightly rentals. The PEG building height projections would dwarf the entire neighborhood and destroy the Old Town character that has attracted all of the present homeowners.

Can you please address how the massive amount of truck diesel fumes generated during all phases of construction would be consistent with the Reduced Emissions projections for our beautiful mountain town of Park City. Lets find a better way to advance the future of our town.

Lastly, can we expect that PEG presents timely responses to the requests of each meeting regarding the 'exceptions' that they are requesting and that the requirements that the Planning Commissioners have asked for them to adhere to. Unless you request timely responses, you are allowing the review process to continue unfairly and be a waste of all of our precious time and resources.

Respectfully,
Deborah Hickey



Snow Flower Homeowners Association
PO Box 448 401 Silver King Dr
Park City UT 84060
435-649-6400

November 18, 2020

Dear Park City Planning Commission,

We continue to have concerns with the proposed development of Parcel E. This includes the change in setback variances, building heights and the entrance and delivery area. We want to highlight our concern with the delivery area and associated noise and traffic that will have an overall negative impact on our owners and guests as well as other nearby condominiums. As suggested in a previous letter, we ask that an alternate and more appropriate site be assigned for the delivery operations.

Another concern is the proposed traffic pattern in the area of Silver King and Three Kings Dr. This is an already small but overtaxed intersection which also includes a bus stop. There are no sidewalks, and each road is very narrow. With the addition of Parcel E use and traffic, this area becomes a safety issue. We urge you to reconsider a better and safe way for traffic and pedestrian flow in this area.

Thank you for your time and consideration of our concerns.

Sincerely,
Deborah Doyle
President, Snow Flower HOA II

Alexandra Ananth

From: Trent Davis <tdavis@compass-management.com>
Sent: Wednesday, November 18, 2020 1:58 PM
To: Alexandra Ananth
Cc: Sarah Hall; John Kenworthy; John Phillips; Mark J. Sletten; Laura Suesser; Douglas Thimm; Christin VanDine; Trent Davis; Robert Schmidt; citynews@parkrecord.com
Subject: PEG Development

Alexandra;
Please read into the record at tonight's PEG meeting.

All the Village Venture and Resort Center Limited retail entities at the base support the PEG Development! PEG has shown that they want to be reasonable and fair as they proceed towards plan approval. This is evident by some of the adjustments they have already made. This development will enhance all of Park City and create a long overdue upgrade to a 40 year old, outdated base area. Most of Park City depends on the ski resorts in one way or another for their livelihoods. It is imperative that we support any efforts to upgrade these areas and stay competitive with other ski resorts throughout the country.

Unfortunately it appears that there is a group who does not want this development to proceed without very restrictive changes and others who are demanding unreasonable changes as evident by the suggested walkway cutting through the middle of parcel B. I am hopeful the City will continue to help see this development to final approval with the appropriate changes as it would be a shame if PEG is forced into no longer proceeding with the development. All of PC would suffer.

Sincerely
Trent Davis
Village Venture / Resort Center Limited

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From: noreply@granicusideas.com
Sent: Wednesday, November 18, 2020 4:57 PM
To: Jessica Nelson; maymary1@msn.com; Alexandra Ananth
Subject: New eComment for Planning Commission

New eComment for Planning Commission

Moir Howard submitted a new
eComment.

Meeting: Planning Commission

Item: 4.A) Park City Mountain Resort
Base Parking Lots - MPD Modification
- Replace Expired Exhibit D of the DA,
the 1998 PCMR Base Area Master
Plan Study Concept Master Plan, With
a New Master Plan, Known as the
Park City Base Area Lot
Redevelopment Master Plan Study.
This Hearing Will Focus on Revised
Plans for Building B. PL-20-04475.
*Public Input will be taken via e-
comments* (A) Public Hearing, No
Action Will Be Taken

eComment: Who is going to be
responsible for and pay for the
ongoing future maintenance of the
parking garages once PEG moves
out? This has become a great
expense for owners of the Lodge at
the Mountain Village. The garages are
the foundation of the buildings so a lot
rides on them!! If someone qualifies
for affordable housing, I question if
they will be able to afford the high
homeowners' dues which this project
is likely to require. Will their HOA dues

be subsidised and if so, by whom? To whom do parking garage fees go? As I previously emailed, the buildings as proposed, even with the new plan, are far too tall and dense and dwarf the surrounding properties. Setbacks, sidewalks - insufficient. Pedestrian/traffic conflicts - a nightmare..... Thanks for your work and consideration. Moira Howard

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Alexandra Ananth

From: Scott Bass <sbassman@me.com>
Sent: Wednesday, November 18, 2020 5:00 PM
To: Alexandra Ananth; Sarah Hall; John Phillips; Mark Sletten; Laura Suesser; Douglas Thimm; Christin VanDine; Jessica Nelson
Cc: Carolyn Rogers; Bob Rieve; Patti Kivel; Terri Zions
Subject: Lodge at the Mountain Village Support of PEG Development

Park City Planning Commissioners and Planners,

I am writing to reiterate that the Board for the HOA of the **Lodge at the Mountain Village** strongly supports PEG Development and their plans for the development of the parking lots at the base of Park City Mountain Resort, and ask that this statement of support be read into the record at the Planning Commission Meeting this afternoon.

Our property is one of the most significantly impacted by this development. PEG Development's plans will transform and modernize the Park City base village into a premier destination worthy of our world class skiing. The current parking lots are outdated and unsightly and limit retail and residential expansion that will very positively impact the economy of Park City. Furthermore, PEG's recent design changes to lower building heights on parcels B and E, add townhomes on the Empire Ave. side of Parcel B, and maintain the Transit Center in the current location demonstrate that they are very reasonable and accommodating in listening to the concerns of Park City residents and the Planning Commission.

We are aware that there is a group who oppose this development and are asking for unreasonable changes that could very well stop the project from moving forward. We are hopeful that the City will give significant weight to the support of property owners such as the Lodge at the Mountain Village who are most impacted by this development. This upgrade to the base village is long overdue and much needed and we will be grateful if the City can advance this development toward final approval.

I wrote prior to the September 22 Planning Commission meeting to express our concerns of the proposed relocation of the Transit Center back in September and asked that the letter be read into the record at the meeting. I do not believe it was read into the record due to the time constraints of that meeting. However, we would very much appreciate you reading this email of our support for PEG Development into the record today.

Best Regards,
Scott Bass

Scott Bass
LMV Board President

From: noreply@granicusideas.com
Sent: Wednesday, November 18, 2020 8:08 PM
To: Jessica Nelson; maymary1@msn.com; Alexandra Ananth
Subject: New eComment for Planning Commission

New eComment for Planning Commission

Sherie Harding submitted a new
eComment.

Meeting: Planning Commission

Item: 4.A) Park City Mountain Resort
Base Parking Lots - MPD Modification
- Replace Expired Exhibit D of the DA,
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a New Master Plan, Known as the
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*Public Input will be taken via e-
comments* (A) Public Hearing, No
Action Will Be Taken

eComment: Thank you
Commissioners for your excellent
questions. Our 1998 CMP was
thoughtfully done, it took untold hours,
it has very appealing characteristics,
and it supports our 2020 Vision. Park
City embraced the 1998 Plan. 2020
building heights, volumes, and set
backs do not come close in
appearance or expectations of the
1998 plan. Building facades go in and
out and up, but do not step back from
roadways, public plazas and

neighborhoods as they did in the 1998 plan.

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From: noreply@granicusideas.com
Sent: Friday, November 20, 2020 2:54 PM
To: Jessica Nelson; maymary1@msn.com; Alexandra Ananth
Subject: New eComment for Planning Commission

New eComment for Planning Commission

Mary Whitesides submitted a new eComment.

Meeting: Planning Commission

Item: 4.A) Park City Mountain Resort
Base Parking Lots - MPD Modification
- Replace Expired Exhibit D of the DA,
the 1998 PCMR Base Area Master
Plan Study Concept Master Plan, With
a New Master Plan, Known as the
Park City Base Area Lot
Redevelopment Master Plan Study.
This Hearing Will Focus on Revised
Plans for Building B. PL-20-04475.
*Public Input will be taken via e-
comments* (A) Public Hearing, No
Action Will Be Taken

eComment: I am a 40 year resident of
Old Town Park City. There is a certain
look feel and ambience that attracts
visitors to our community. Over the
years we have fought various battles
to keep our town authentic, true to its
history and surround it with open
space. As you know, in 1998 Powder
Core along with PCMR presented a
plan for development of the open
parking lots at the foot of the Park City
resort. Their presentation was filled
with the research they'd done, a

sympathetic extension of Historic Park City, compatible architecture, plazas, landscaping and a welcoming entrance to the development. The architecture reflects the historic mining town turned ski resort. This is the very kind of look that attracts people to our community. In 2020 PEG has presented a plan that they claim was put together through research. It in no way has the same appeal the 1998 plan has. The buildings are crammed into the space, the architecture is a generic barracks, campus like, housing project presentation that in no way extends the welcoming look and feel of Park City. It smacks of a look that considers the bottom line only. I would urge the planning commission to carefully consider the impact that will have on the future of Park City. This is our last opportunity to make or break our beloved town. Thus, the historic decision should be made to reject the current PEG plan. It would behoove the developer, the citizens, and the planning commission to reconsider the 1998 plan and perhaps with a few upgrades such as making it a green project for net zero footprint, could be a win, win for citizens, developer and visitors.

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PARKING GARAGES

Park City Council, Planning Commission & Community are not bound
by the developer's contract with Vail

Vail contract with the developer requires the developer to maintain a minimum of 1,200 Day-Skier parking spaces

- Developer doesn't want to go underground due to time & money
- Developer has stated if required to go underground, they will request additional density and same or higher building heights to develop additional market rate residences

PARKING GARAGES

1998 DA – “[i]f, in practice the parking mitigation plan fails to adequately mitigate peak day parking requirements, the City shall have the authority to require the Resort to limit ticket sales until the parking mitigation plan is revised to address the issues.” DA 2.1.13.

1998 CMP & 1997 MPD – parking is spread out equally between parcels and below grade – underground structures

New Master Plan – Predominantly above ground parking and over 400 spaces less of day-skier and approximately 1,000 less of other spaces as outlined in the 1998 CMP.

- **THE DEVELOPER HAS NOT SUBMITTED A PARKING MANAGEMENT PLAN**
- **DAY-SKIER PARKING IS NOT SPREAD THROUGHOUT THE RESORT**

PARCEL B GARAGE

Existing: 388 stalls; 33% of all Day-skier & Resort parking

New Master Plan: 815 stalls; 65% all Day-skier and 50% all Resort

- Four story predominantly above ground parking structure plus additional 3-5 stories of residential living above garage.
- Limited access due to one way loop through resort for visitors and residential neighborhoods
- Entrance/exit to garage directly across from single family homes
- No Employee Parking
- No short term parking for management or service vehicles for 56 condos eligible for nightly rentals or the other housing (Affordable/Employee) on site

PARCEL B

IMPACT OF GARAGE ON PEDESTRIAN TRAFFIC

PARKING	# OF STALLS	# OF PEDESTRIANS FROM VEHICLES AVO = 2.7	# OF PEDESTRIANS FROM VEHICLES AVO = 3.7
CURRENTLY	388	1,048	1,436
PROPOSED	<u>815</u>	<u>2,201</u>	<u>3,016</u>
INCREASE	427	1,153	1,580

Increase is over **2 TIMES** current VEHICLE UNLOADING on Parcel B
and does **not include** these **additional** pedestrians:

- Locals walking to the resort
- Shuttle drop-offs on east side of Lowell Avenue
- Affordable Housing and/or Employees living on site
- Owner and/or Guests living/staying in market rate condos on site

PARCELS C & E GARAGES

EXISTING # OF STALLS C & E: 584

NEW MASTER PLAN # OF STALLS: 720

PARCEL C

1998 CMP – Skier Services & Parking

NEW MASTER PLAN – 249 Key Hotel

- Provides 0% of Day-skier parking
- 183 **VALET ONLY** parking stalls for hotel guests
- No general public parking for retail or other resort attractions and/or amenities

PARCEL E

- Only other resort location for Day-skier parking with 414 stalls
- Provides 35% of total Day-skier parking and 32% of all Resort parking
- Garage entrance/exit is located on Silver King Drive and **1998 CMP** requires no left turn out of garage along with signage to prevent traffic from using Three Kings Drive as access to/from resort

TRAFFIC CIRCULATION

1998 CMP – Further review may indicate Lowell Ave conversion to one-way

NEW MASTER PLAN – New roundabout at intersection of Silver King, Empire & 15th to one way loop beginning at north end of Lowell and continuing south to Shadow Ridge or Manor Way then back north on Empire Avenue

- Multiple opportunities for conflict and delays:
 - Uber, Lyft, Black Car, shuttle and skier drop off points, multiple ground level pedestrian crossings, garage access points, hotel/condo vehicle access points, loading dock access point, NAC access point, Transit center stop and more
- Residents on Lowell, Kings Crown, Northstar and Empire must travel through resort center regardless of time of day or time of year which will **add to congestion**
- **Emergency vehicle** delays responding to Lowell, Kings Crown, Northstar and Empire neighborhoods with extremely limited alternative access available. Potential for deadly consequences exist under this plan.

TRAFFIC CIRCULATION

- Current traffic issues at the intersection of Park, Empire & Deer Valley Drive not addressed in proposal.
- Justification for the creation and effectiveness of a roundabout at Empire, Silver King and 15th Street has not been provided.
- Traffic jam potential at new light at Silver King & Lowell with vehicles entering garage on left and oncoming Three Kings Drive vehicle and pedestrian traffic.
- Diversion of traffic away from Payday, Thaynes Canyon and Three Kings has not been adequately addressed.
- Resort guests are not hostages; increase in traffic density
- People use Waze & other apps to find shortest path whether by car, bike or foot

DEVELOPER HAS NOT PROVIDED A TDM ANALYSIS

PEDESTRIAN CIRCULATION

1998 CMP PARCEL B “[o]ne semipublic pathway of at least 30’00” in width.”

Let’s consider the dangerous journey for pedestrians using 14th street:

- Pedestrians from 14th must cross Empire with **NO CROSSWALK** and
- There is no 14th Street pedestrian access through Parcel B; therefore,
- Pedestrians must cross garage entrances/exits and townhome driveways around Parcel B before,
- Crossing Lowell via one of only two crosswalks to the existing resort center

1998 CMP PARCEL E “[a] covered arcade on the building’s western edge creates a passage way from Three Kings to the resort’s new base operations.”

Let’s consider the long journey for pedestrians using Three Kings Drive:

- Pedestrians from Three Kings Drive must cross Three Kings with **NO CROSSWALK**
- Proceed along the north side of Silver King
- Cross over Silver King at a traffic light and finally,
- Head south along Lowell to access plaza and new or existing resort operations

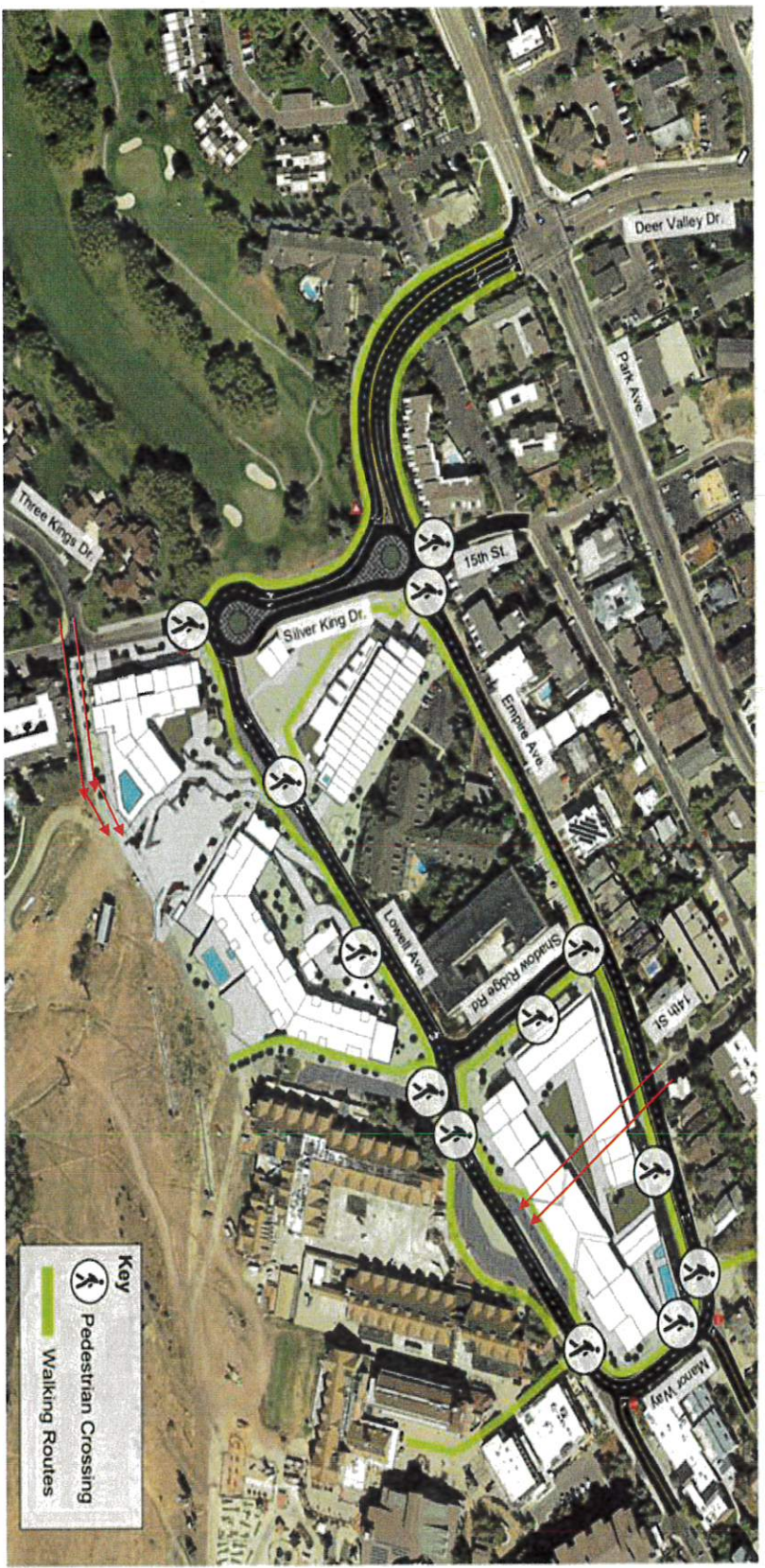
SIDEWALKS

1998 CMP REQUIRES “[s]idewalks indicated as major access routes between principal base area nodes shall be a minimum of 15’0” wide, on average, or where existing buildings and/or setbacks do not permit, they shall be as wide as possible.”

NEW MASTER PLAN developer proposes sidewalks that are only 8’-10’ wide and generally located on only one side of street.

With the exception of Parcel D with Silver King Condos & Shadow Ridge adjacent, **there are NO existing buildings that would preclude the developer from creating 15’ wide sidewalks for pedestrian safety and easier access to all points of the resort area including the two new plazas.**

PEDESTRIAN CIRCULATION



OPEN SPACE

Under Section 15-15 of the LMC, Open Space must be public

1998 CMP Parcel B “[P]rovide at least two significant pockets of open space, each of which is visible and accessible (free and clear without occupied overhead encumbrances)”

New Master Plan Parcel B does not have a single pocket of open space.

- Based on the developer’s application, the multi-parcel site is technically 75.7% open space; however, this is largely in part due to the 11 acres on the mountain reserved for open space which the developer “inherits” as part of the agreement.
- Without the 11 acres “set aside” by the agreement, the contribution to open space by the parcels being developed is only 49%.
- It is unclear from the New Master Plan what the developer calculated as open space. Hotel, Ski Club and plaza areas dedicated to private guests do not qualify as open space.

The lack of open space throughout the parcels creates a sense of too big and too dense of a development for the site.

EMPLOYEE HOUSING

1998 DA requires “off-site housing for 80 PCMR employees on or before October 1, 2003.” (DA 2.2)

New Master Plan proposes on-site employee housing.

1998 DA mandates that “[i]n no case shall small scale MPDS which represent approvals for a total of 60% of small scale MPDS within the PCMR Concept Master Plan, be issued until the [employee] housing requirement is available for occupancy. (DA 2.2) The only exception is if “there is a downturn in the market.” (DA 2.2 n.1.) Therefore, the exception does not apply and the 1998 DA requirement of housing for 80 employees must be met PRIOR to any approval of the remaining small scale MPDs. Each parcel is technically a small scale MPD.

New Master Plan proposes on-site employee housing which will not be complete and available for occupancy until Fall/Winter 2023.

The developer fails to meet both of the 1998 DA requirements listed above.

DELIVERY

1998 DA requires that the “final site planning shall orient delivery, service and trash access away from existing residential uses whenever possible.” (DA 2.1.3.)

New Master Plan calls for the following:

- Loading dock off of Silver King between Snowflower Condominiums and Parcel E near the intersection of Three Kings
 - This is an extremely residential area with high pedestrian volume as well
 - Traffic for delivery should not be funneled towards Three Kings Drive
- Loading dock off of Lowell Avenue at Parcel C for hotel delivery and service
 - Near UBER/Lyft/Black Car/skier drop-off
 - Adjacent to path way for pedestrian traffic from the plaza and east of Lowell
- Trash and mechanical facility servicing Parcel B on Empire
 - Directly across from single family homes just south of 14th street

MASS TRANSIT

1998 DA Section 2.1.4 mandates that the “Bus Drop Off Area must be improved.”

New Master Plan provides for only **four** bus spaces.

AECOM is the City’s traffic consultant and one of their many conclusions which differ from the applicant’s is at least **eight** bus spaces are needed.

Planning Department has concluded the bus stop and mass transit plans are **woefully inadequate** – no shelter, no restrooms, no information kiosk, etc.

In addition, the proposed one-way traffic circulation pattern will result in a **loss of existing bus stops**.



Presentation to the Park City Planning Commission
Regarding

Base Area Redevelopment

On Behalf of the

The Responsible Resort Area Development Coalition (RRAD)

November 2020

Introduction to RRAD

- RRAD is not opposed to development; we seek to promote thoughtful development that benefits the broader Park City community
- We think that development of the Base Area represents a unique and historic opportunity to reshape the future, not just of the Resort Center, but of the ENTIRE City
- We feel strongly that the Base Area can be developed in a way that satisfies all of the functional concerns of the developer and the long term objectives of the City, while being highly sensitive to the quality of life and life safety concerns of the neighbors and community as a whole
- We have serious concerns about numerous aspects of the project currently being proposed by PEG, especially the impact of building height, reduced setbacks, density and traffic generation
- The proposed project is non-compliant with the 1998 Development Agreement (the “DA”) and the Park City Land Management Code (the “LMC”) in many respects

Agenda

Over the next few minutes, Deb Rentfrow and I will discuss areas where the PEG proposal does not comply with the DA and the LMC. I will address the following key issues:

- **Exceeds maximum allowable square footage**
- **Violates prohibition on reallocation of density across different parcels**
- **Height variance is not justified**
- **Doesn't meet standard for reduced setbacks**
- **Architectural detail not consistent with 1998 DA**
- **Disrespects mandatory view corridors**

Following my remarks, Deb will address some additional important topics

Exceeds Maximum Square Footage

- The PEG plan is 16,000 square feet **OVER** the maximum allowable square footage
- While the DA allows 805,977 square feet (the “vested rights”), it is important to put this massive amount of square footage in context
- This is approximately 2-3x **MORE** than what is currently permitted in the Resort Commercial (“RC”) zone

PEG Square Footage Calculations

<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>	<u>F</u>	<u>G</u>	<u>H</u>	<u>I</u>
			1998	PEG Proposal				
	Site Area	By-Right RC Zoning	Maximum Permitted	Proposed Building Area	Implied	Above Grd. Parking	Total	Adjusted
Parcel	(SF)	FAR (1)	(SF)	(SF)	FAR (1)	(SF)	(SF)	FAR (1)
B	137,492	1.0	323,519	243,995	1.8	137,536	381,531	2.8
C	134,863	1.0	192,963	207,857	1.5	3,208	211,065	1.6
D	89,124	1.0	102,338	94,168	1.1	15,265	109,433	1.2
E	92,380	1.0	187,157	119,956	1.3	-	119,956	1.3
TOTALS	453,859	1.0	805,977	665,976	1.5	156,009	821,985	1.8

(1) FAR stands for Floor Area Ratio, a measure of the total building area divided by the square footage of the site.

Violates Prohibition on Reallocation of Density by Parcel

- Square footages agreed in the 1998 DA are the **MAXIMUMS** for each Parcel
- Further, the DA expressly **PROHIBITS** the transfer of “unused” density from one parcel to another
- The PEG plan materially exceeds the permitted square footage on three of the four parcels

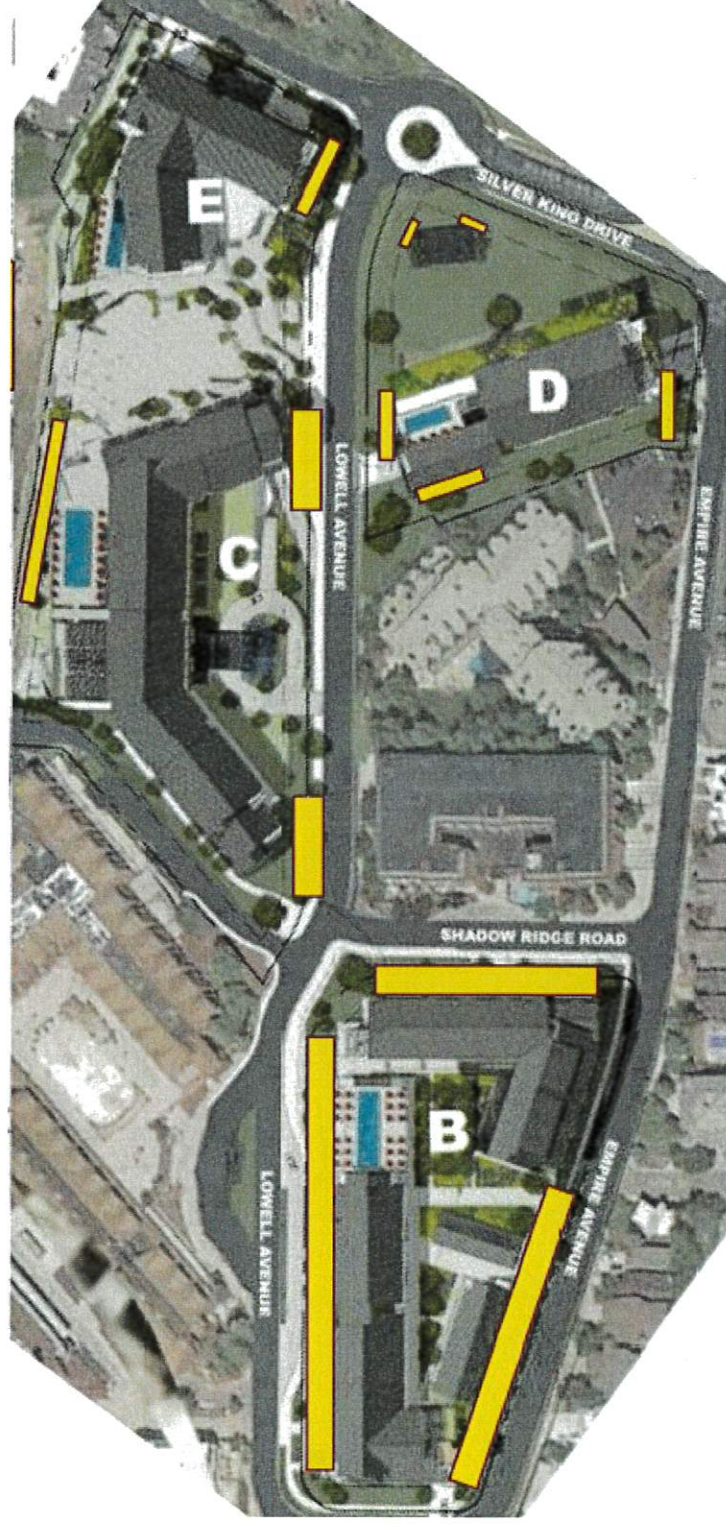
PEG Reallocation of Density

<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>	<u>F</u>
Parcel	PEG Proposal				Amount Over Maximum (SF)
	Maximum Allowed	Proposed Building Area	Above Grade Parking	Total Proposed	
	(SF)	(SF)	(SF)	(SF)	
B	323,519	243,995	137,536	381,531	58,012
C	192,963	207,857	3,208	211,065	18,102
D	102,338	94,168	15,265	109,433	7,095
E	<u>187,157</u>	<u>119,956</u>	<u>-</u>	<u>119,956</u>	<u>(67,201)</u>
TOTALS	805,977	665,976	156,009	821,985	16,008

- Height limit in the RC zone is 35'
- PEG proposal averages over 80' and exceeds 100' in some areas (on average, more than one story taller than the 1998 Plan)
- As noted in the DA, height variances can only be granted based on a SITE SPECIFIC analysis and ONLY apply to the specific plans that were reviewed and approved at that time
- The 1998 Plan featured a SIGNIFICANT amount of architectural variation in height and massing and the MAJORITY of the height and mass was placed TOWARDS the hill and AWAY from existing residential uses

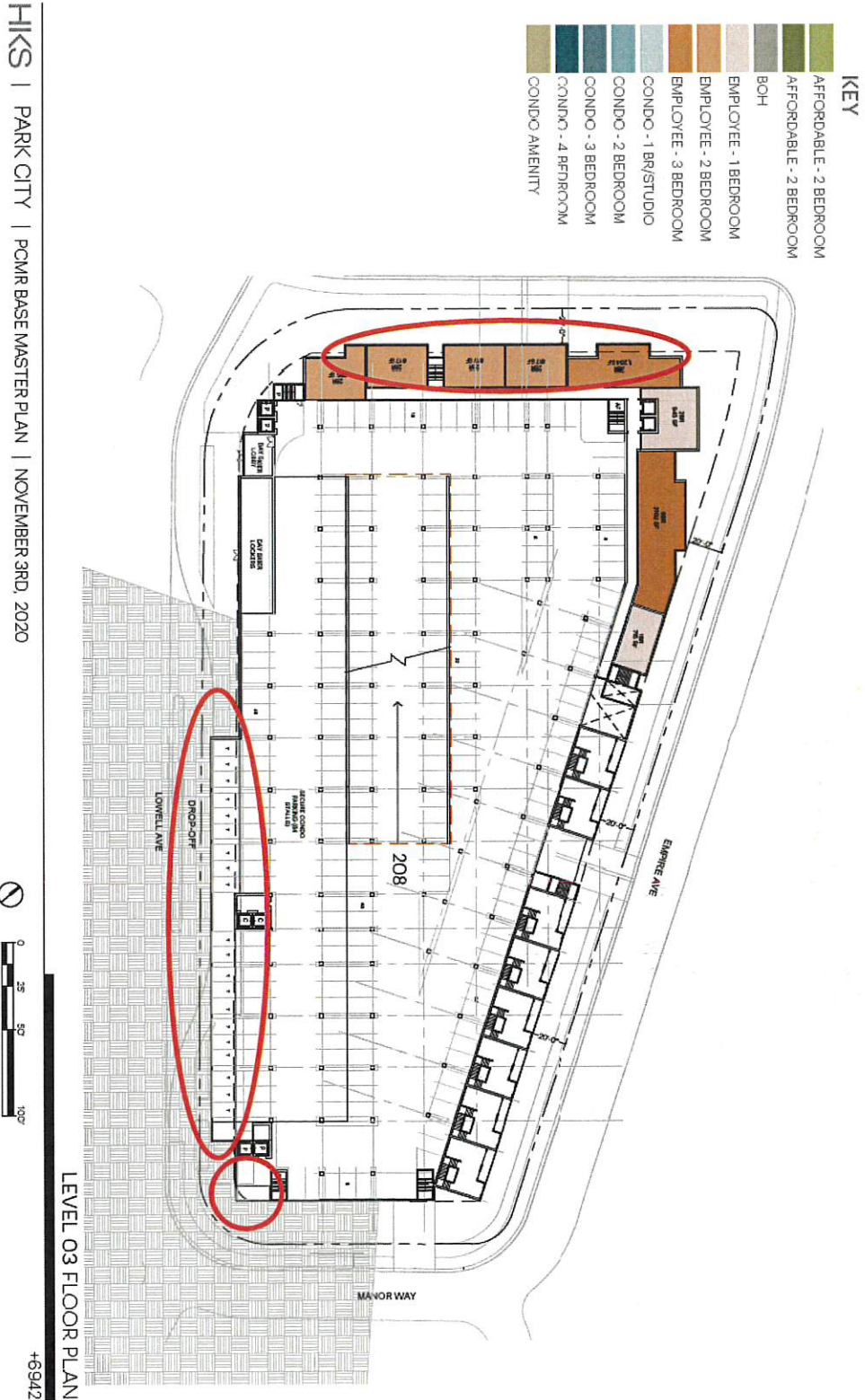
Doesn't Meet Standard for Setback Reductions

- In master planned developments, the code requires that all buildings be setback 25' from the property line; exceptions, if granted, must be no less than 20'
- PEG is requesting significant **REDUCTIONS** to the setbacks as seen in yellow in the illustration below
- In a project that is already unbearably dense (2-3x current zoning) and out of character for the neighborhood, this would be a crushing blow to the surrounding 2,3 and 4 story buildings
- The legal standard for setback reductions is very high – they must be **NECESSARY** for architectural interest and variation - and this project does not meet that standard!



Doesn't Meet Standard for Setback Reductions - Parcel B Case Study

- Nearly the entire perimeter of Building B is set back 20' vs. the zone requirement 25'
- In addition, the areas in red below are set back even less than the minimum 20'

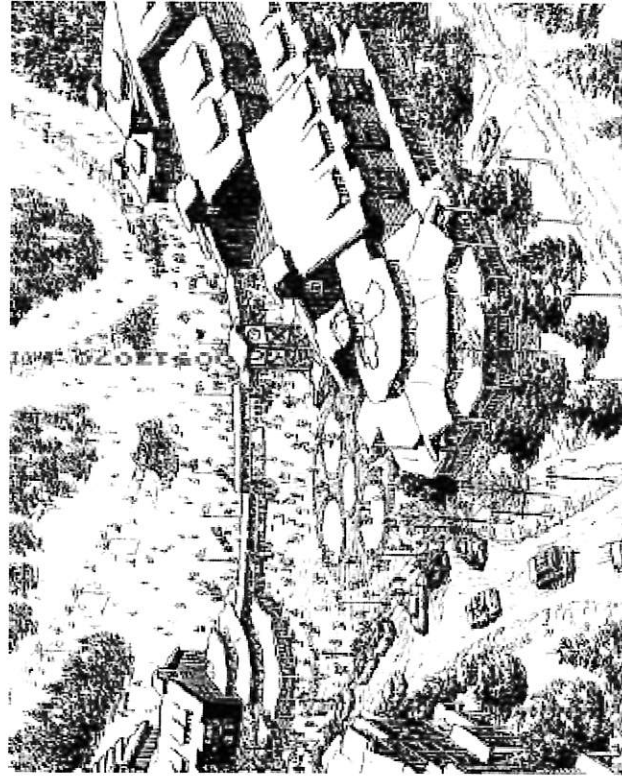


Architectural Detail Not Consistent with the 1998 DA

Conformance with the 1998 Plan's 11 page "Architectural Design Guidelines" was a condition of the DA

- Project a cohesive image that responds to the history and charm of the Park City area as a rustic mining town
- Architecture should look like it belongs in Park City and no place else
- Proposed entrance to PCMR major gateway feature
- Large monolithic structures are atypical in Park City
- Building heights shall step up from major roadways, public plazas and neighboring projects with higher buildings placed closest to the mountain backdrop
- The overall building volumes shall be broken up and stepped both in plan and elevation

1998 Plan



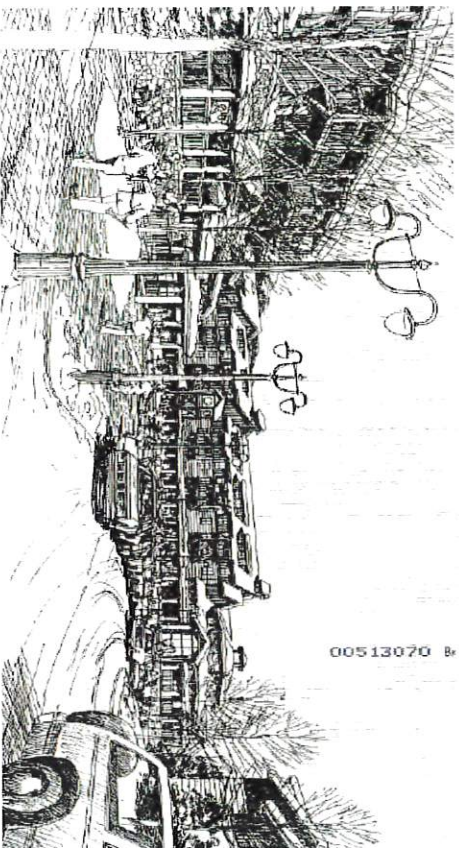
PEG Plan



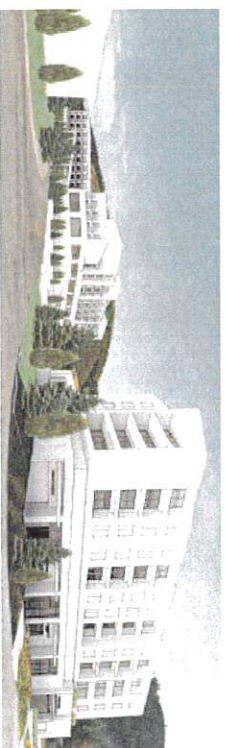
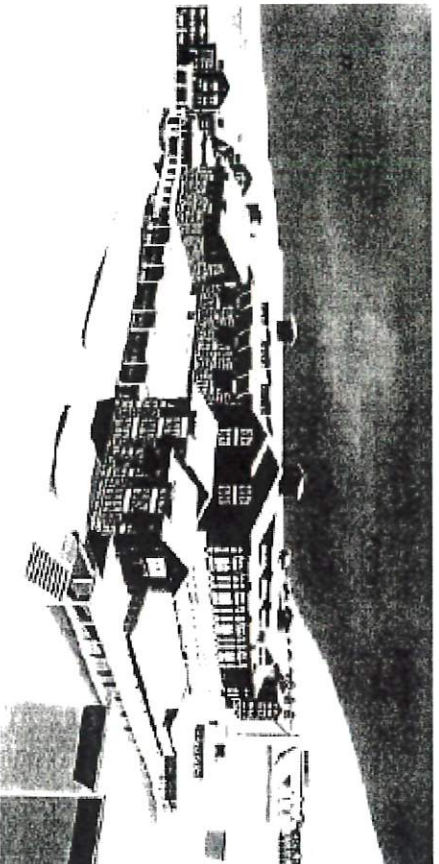
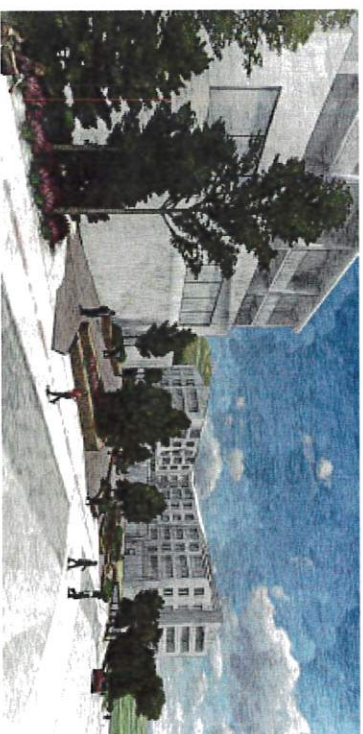
Architectural Detail Not Consistent with the 1998 DA

Key Comparisons of 1998 Plan to PEG Proposal

1998 Plan



PEG Plan

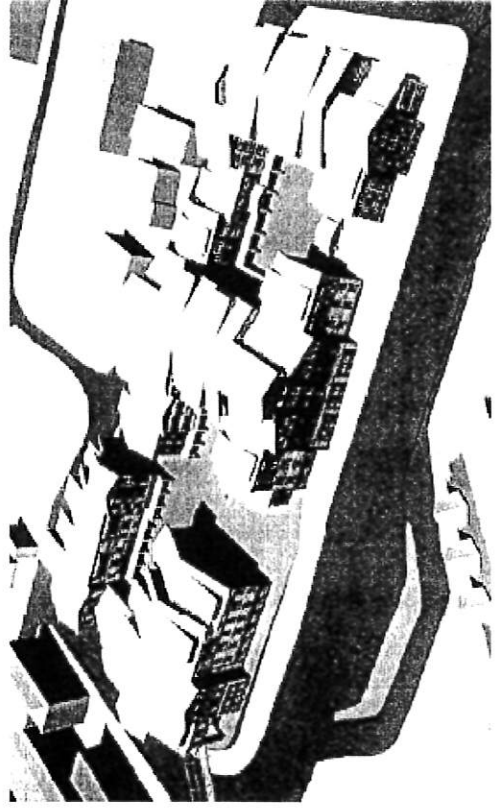


Architectural Detail Not Consistent with the 1998 DA – Parcel B Case Study

The Architectural Design Guidelines for Parcel B (below) illustrate a dramatic disconnect between the 1998 Plan and PEG's proposal

Similar “disconnects” are also prevalent in PEG's designs for the other three Parcels

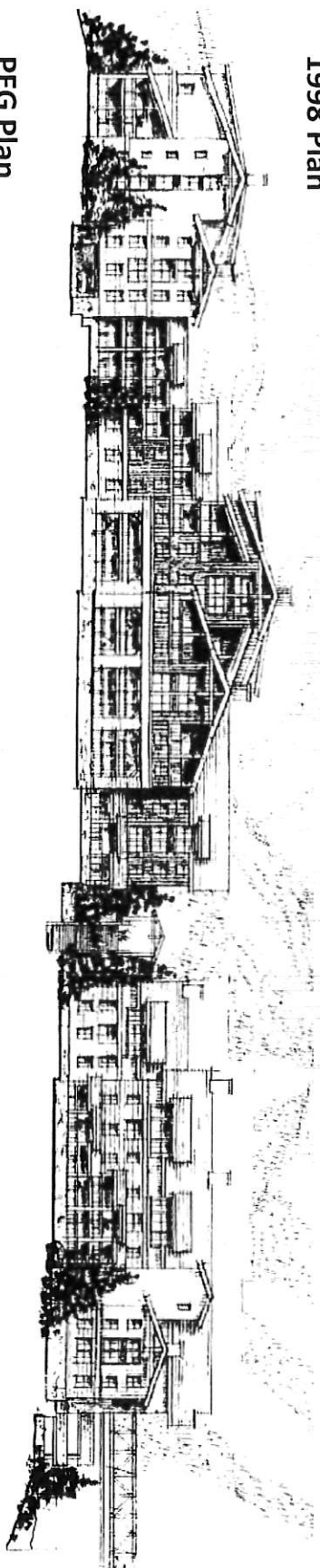
- Parcel B is conceived as at least four separate buildings which surround semiprivate quadrangles enclosed by low-scale arcades
- Their scale is modulated by numerous steps in massing both vertically as well as horizontally from the property lines
- The parcel's bulk steps down with the contours from Lowell toward the corners of the site
- In order to minimize height and shadow impacts, the streetwall along Empire has a saw tooth plan with large setbacks: one, two and three story elements vary height and further reduce the building's scale and apparent mass
- The tallest portions of the building are located at the site's center and closest to Lowell Avenue where bulk and shadow impacts on adjacent properties will be minimized
- The concept design establishes a pedestrian and view corridor to the resort center from 14th Street



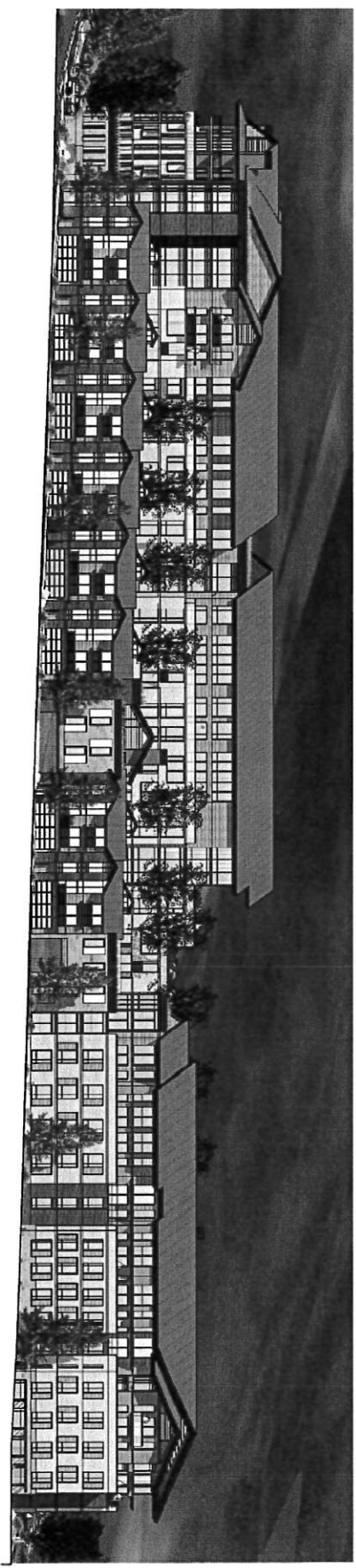
Architectural Detail Not Consistent with the 1998 DA – Parcel B Case Study

Comparison – Empire Avenue looking West towards Resort Center

1998 Plan



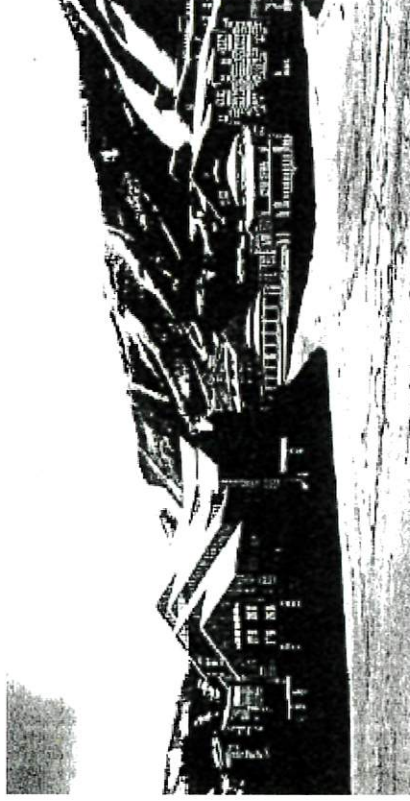
PEG Plan



Disrespects Mandatory View Corridors

- The DA identified two critical view corridors that had to be maintained in any development – the Empire/Silver King view corridor and the 14th Street view corridor
- The Empire/Silver King view corridor has been “moderately impacted” by the PEG project’s higher overall building height, lack of modulation of building heights and minimal vertical and horizontal articulation and lack of human scale and detail

1998 Plan



PEG Plan

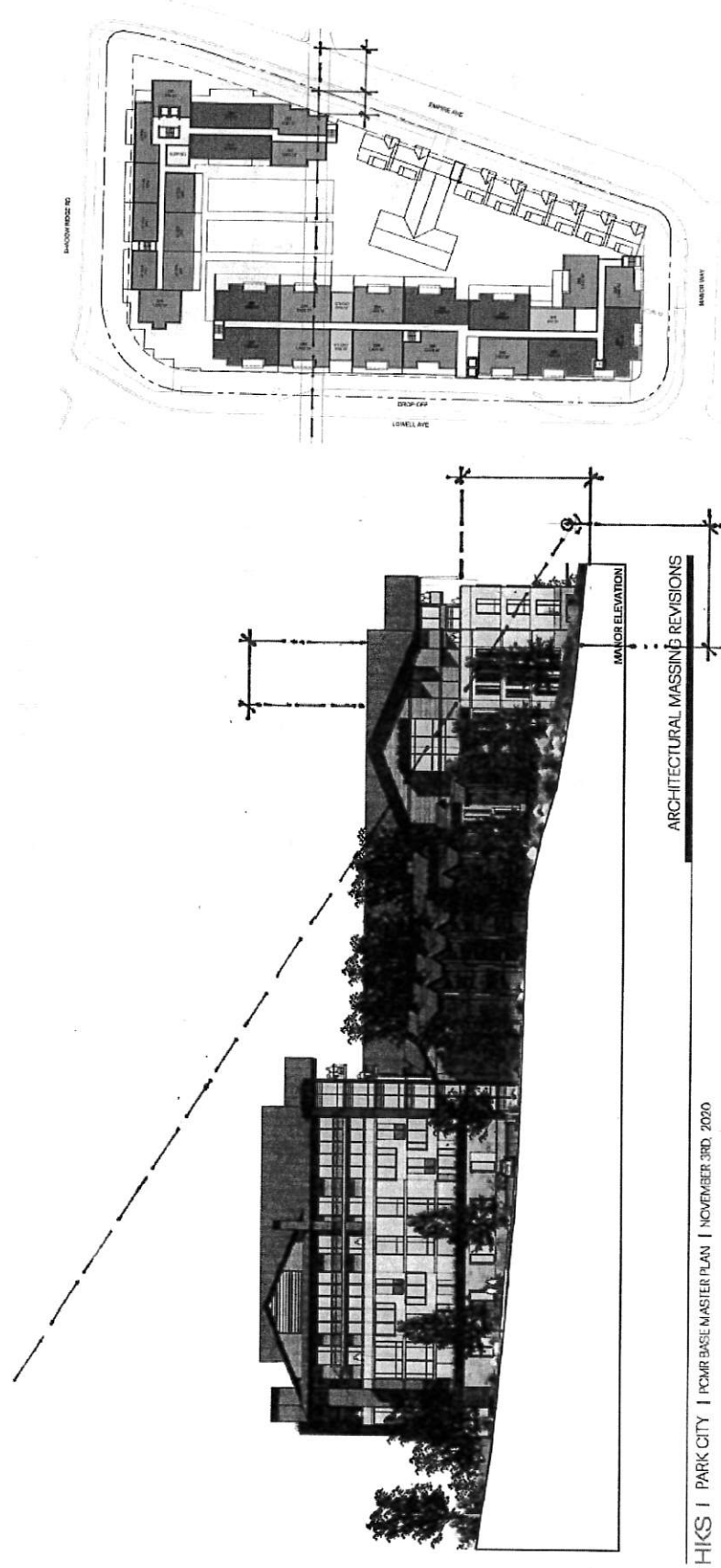


91

-

Disrespects Mandatory View Corridors

- Contrary to PEG's public remarks about "maintaining some views through Building B", there is absolutely no view corridor nor maintenance of the historic pedestrian connection



HKS | PARK CITY | PCMR BASE MASTER PLAN | NOVEMBER 3RD, 2020

PRELIMINARY AND TENTATIVE – FOR DISCUSSION PURPOSES ONLY

Thank you for your time and attention!

Exhibit A

Background

The Planning Commission held Work Sessions on the application on [May 27, 2020](#), [June 10, 2020](#), and [June 24, 2020](#). An administrative determination was made on [July 8, 2020](#), that the application is considered a substantive modification of the existing MPD. Minutes from those meeting are linked.

The public hearing was opened on [August 26, 2020](#).

Previous Staff Reports, Presentations and additional project information including schedule updates, can be found on the City's project webpage:

<https://www.parkcity.org/departments/planning/park-city-mountain-base-area-development-project>

Master Planned Development Process

The regulatory process and requirements for Master Planned Developments are outlined in [LMC § 15-6, Master Planned Developments](#).

The purpose of the MPD Chapter is to describe the process and criteria for review of Master Planned Developments (MPDs) in Park City. The Master Planned Development provisions set forth Use, Density, height, parking, design theme and general Site planning criteria for larger and/or more complex projects where the MPD process can provide design flexibility necessary for well-planned, mixed use developments that are Compatible with the surrounding neighborhood. The goal of this section is to result in projects which:

- A. complement the natural features of the Site;
- B. ensure neighborhood Compatibility;
- C. strengthen the resort character of Park City;
- D. result in a net positive contribution of amenities to the community;
- E. provide a variety of housing types and configurations;
- F. provide the highest value of open space for any given Site;
- G. efficiently and cost effectively extend and provide infrastructure;
- H. provide opportunities for the appropriate redevelopment and reuse of existing structures/sites and maintain Compatibility with the surrounding neighborhood;
- I. protect residential uses and residential neighborhoods from the impacts of non-residential Uses using best practice methods and diligent code enforcement; and
- J. encourage mixed Use, walkable and sustainable development and redevelopment that provide innovative and energy efficient design, including innovative alternatives to reduce impacts of the automobile on the community.
- K. Encourage opportunities for economic diversification and economic development within the community.

The Planning Commission is the primary review body for MPD's. The Planning Commission shall approve, approve with modifications, or deny a requested MPD with written findings of fact, conclusions of law, and in the case of approval, conditions of approval. All MPD applications shall be reviewed for consistency with the goals and objectives of the Park City General Plan.

To approve an MPD, the Planning Commission is required to make the Findings outlined in [LMC § 15-6-6\(A-O\)](#) as follows:

- A. The MPD, as conditioned, complies with all the requirements of the Land Management Code;
- B. The MPD, as conditioned, meets the minimum requirements of Section 15-6-5 herein;
- C. The MPD, as conditioned, provides the highest value of Open Space, as determined by the Planning Commission;
- D. The MPD, as conditioned, strengthens and enhances the resort character of Park City;
- E. The MPD, as conditioned, compliments the natural features on the Site and preserves significant features or vegetation to the extent possible;
- F. The MPD, as conditioned, is Compatible in Use, scale, and mass with adjacent Properties, and promotes neighborhood Compatibility, and Historic Compatibility, where appropriate, and protects residential neighborhoods and Uses;
- G. The MPD, as conditioned, provides amenities to the community so that there is no net loss of community amenities;
- H. The MPD, as conditioned, is consistent with the employee Affordable Housing requirements as adopted by the City Council at the time the Application was filed.
- I. The MPD, as conditioned, meets the Sensitive Lands requirements of the Land Management Code. The project has been designed to place Development on the most developable land and least visually obtrusive portions of the Site;
- J. The MPD, as conditioned, promotes the Use of non-vehicular forms of transportation through design and by providing trail connections; and
- K. The MPD has been noticed and public hearing held in accordance with this Code.
- L. The MPD, as conditioned, incorporates best planning practices for sustainable development, including water conservation measures and energy efficient design and construction, per the Residential and Commercial Energy and Green Building program and codes adopted by the Park City Building Department in effect at the time of the Application.
- M. The MPD, as conditioned, addresses and mitigates Physical Mine Hazards according to accepted City regulations and policies.
- N. The MPD, as conditioned, addresses and mitigates Historic Mine Waste and complies with the requirements of the Park City Soils Boundary Ordinance.
- O. The MPD, as conditioned, addresses Historic Structures and Sites on the Property, according to accepted City regulations and policies, and any applicable Historic Preservation Plan.

Appeals of Planning Commission action shall be conducted in accordance with [LMC § 15-1-18](#).

Once the Planning Commission has approved an MPD, the approval is put in the form of a Development Agreement (DA). The DA must be ratified by the Planning Commission, signed by the City Council and the Applicant, and recorded with County. Minor administrative modifications are allowed. Construction is required to commence within two (2) years.

After an MPD is approved the developer must subdivide individual parcels, and seek Conditional Use permits if required by the Planning Commission at the time of the MPD approval.

Without limiting the Planning Commission's review of the full MPD, staff understands current expectations of the Commission are to focus primarily on the following:

Scope of Review Table

Topic	How Reviewed	Relevant Code
Density	1998 DA including allocation between parcels; net reduction of UE's proposed along with a shifting of density among parcels	1998 DA ; 2019 First Amendment to the DA
New Site Plan	Substantive Amendment to Exhibit D of the 1998 DA	15-6-5(G)
Perimeter Setback Reductions	Newly applied for	15-6-5(C) 15-2.16-3(C), (E), and (G)
Building Height Exceptions	Newly applied for	15-6-5(F) 15-2.16-4
Parking	Substantive Amendment to Exhibit K of the 1998 DA	15-6-5(E) and comparison to mitigation in existing MPD
Traffic and Transportation Mitigation	Substantive Amendment to Exhibit J of the 1998 DA	Traffic and Transportation Master Plan and comparison to mitigation in existing MPD
Affordable Housing	Blended proposal per 2015 COA	current LMC/ Housing Resolution for parcels B-E based on employee generation; propose incorporating 23 bed deficiency but not apply new housing resolution; pending review of Housing Authority

Phasing Plan	Substantive Amendment to Exhibit H of the 1998 DA	15-6-4(G)(7) requires a Phasing Plan