



**PARK CITY PLANNING COMMISSION MEETING
SUMMIT COUNTY, UTAH
November 18, 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, November 18, 2020.

NOTICE OF ELECTRONIC MEETING & 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 Revised Plans for Building B. PL-20-04475.

Public Input will be taken via e-comments

(A) Public Hearing, No Action Will Be Taken

[PCM Base Staff Report](#)

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

[Exhibit B: Applicant's Building Height and Setback Justification Letter](#)

[Exhibit C: Public Comments](#)

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
Project #: PL-20-04475
Author: Bruce Erickson – Planning Director
Alexandra Ananth – Senior Planner
Date: November 18, 2020
Type of Item: Administrative Public Hearing – MPD Modification

Summary Recommendations

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 for this application was opened on [August 26, 2020](#), with a focus on the proposed new 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 hearing on [October 28, 2020](#), focused on sustainability, utilities, project phasing and construction mitigation. It is expected that many of these topics will be discussed further at future public hearings.

Staff recommends the Planning Commission continue the public hearing on November 18, 2020, on the redevelopment of the Park City Mountain Base Area Development, with a focus on [revised plans submitted for Building B](#), as well as the request for exceptions to perimeter setbacks and building height. The Planning Commission should evaluate these elements of the application, in accordance with the [MPD section of the LMC](#), the existing DA, and the goals and objectives of the Park City General Plan. Staff recommends the Commission consider public input and keep the hearing open until the Commission has completed its review of the project, with other topics to be considered at additional public hearings. 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 hearing for this project is scheduled for December 16, 2020, and is expected to focus on a revised sustainability submission. 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: DA 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. (VRCPHC)
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](#).

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. Additional information was submitted on April 20, 2020, including a “Request for Exceptions to the Zoning Requirements for Height and Setbacks.” [Revised plans for Parcel B](#) were submitted on November 4, 2020.

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 A of this Staff Report.

Background

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](#).

On November 4, 2020, the applicant submitted [revised plans for Building B](#). These revisions were received after the deadline for Staff Reports to be completed, which was November 2, 2020. Therefore this Staff Report is brief, and plans will be presented with analysis at the November 18, 2020, public hearing.

At the [August 26, 2020](#), meeting where conceptual architectural plans were first presented, the Commission expressed that the following would be helpful to the Commission's deliberations on this parcel:

- maintaining views of the mountain from 14th street,
- pedestrian access though and around the parcel,
- eye level vantage point visuals,
- a comparison of heights to the 1998 plans,
- cross sections showing the amount of below grade excavation,
- code based language for building height and perimeter setback exceptions, and
- consideration for having less than 1,200 parking stalls on site for one season.

Since the August meeting, the applicant has:

- removed one story of the affordable and employee housing that fronts on both Shadow Ridge and a portion of Empire Avenue,
- shifted that mass to the Lowell Avenue and Manor Way façade, which grew by one story, and
- added eight townhome style units along Empire Avenue to screen the parking garage and present a more residential façade to the neighborhood.

Analysis

The applicant is still seeking perimeter setback reductions in accordance with [LMC Section 15-6-5\(C\)](#), from the MPD requirement of 25 feet, to the RC zone required setback of 20 feet.

[LMC Section 15-6-5\(C\)1](#). The Planning Commission may decrease the required perimeter Setback from twenty-five feet (25') for Master Planned Development Applications greater than two (2) acres to the zone-required Setback if it is necessary to provide desired architectural interest and variation.

The applicant is also still seeking exceptions to the building height requirement of 35 feet, in accordance with [LMC Section 15-6-5\(F\)](#).

[LMC Section 15-6-5\(F\)](#). The Building Height requirements of the Zoning District in which a Master Planned Development is located shall apply, except that the

Planning Commission may consider an increase in Building Height based upon a Site specific analysis. The Applicant must request a Site-specific determination and shall bear the burden of proof to the Planning Commission that the necessary findings for an increase in Building Height can be made, according to Subsections (1) through (5) below. In order to grant Building Height in addition to that which is allowed in the underlying Zoning District, the Planning Commission must find that:

1. The increase in Building Height does not result in increased square footage or Building volume over what would be allowed under the zone-required Building Height and Density, including requirements for Facade variation and design, but rather provides desired architectural variation, unless the increased square footage or Building volume is from the Transfer of Development Credits;
 2. Buildings have been positioned to minimize visual impacts on adjacent Structures. Potential problems on neighboring Properties caused by shadows, loss of solar Access, and loss of air circulation have been mitigated as determined by the Site specific analysis;
 3. There is adequate Landscaping and buffering from adjacent Properties and Uses;
 4. Increased Setbacks and separations from adjacent projects are proposed;
 5. The additional Building Height results in more than the minimum Open Space required and results in Open Space that is publicly accessible;
 6. The additional Building Height is designed in a manner that provides a transition in roof elements in compliance with Chapter 15-5, Architectural Review, or the Design Guidelines for Park City's Historic Districts and Historic Sites if the Building is located within the Historic District.
- If and when the Planning Commission grants additional Building Height based on a Site specific analysis, the approved additional Building Height shall only apply to the specific plans reviewed and approved by the Planning Commission. Additional Building Height shall be specified as a Finding of Fact in the Master Planned Development Approval, in the Development Agreement, and on each plat within the Master Planned Development that includes a Building with an additional Height allowance.

The applicant may present changes to Building E at the November 18, 2020, public hearing, but no changes to Building E have been submitted prior to the publication of this Staff Report.

Additionally, the applicant submitted a letter regarding the building height and setback exceptions on November 13, 2020 (Exhibit B).

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 November 4, 2020.

Public Input

Public comments received since the last Staff Report are attached to this Staff Report (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.

Summary Recommendations

Staff recommends the Planning Commission discuss the application with a focus on Parcel B, conduct a public hearing, and continue the public hearing process to December 16, 2020.

Exhibits

Exhibit A – Background Information and Summary of MPD Process

Exhibit B – Applicant's Building Height and Setback Justification Letter

Exhibit C – Public Comments

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



November 13, 2020

Alexandra Ananth, Senior Planner
Bruce Erickson, Planning Director
Park City Municipal Corp.
445 Marsac Avenue
Park City, UT 84060

Re: Section 15-6-5(F) Building Height Requirements and Section 15-6-5(C) Setbacks– Park City Base Area Master Plan Amendment

Dear Alexandra and Bruce,

Please consider this a request for a site-specific determination for an increase in Building Height and decrease in setback within the Master Plan Development of the Park City Mountain Resort. The required findings and the justification for both the height exceptions (per LMC 15-6-5(F)) and the setback exceptions (per LMC 15-6-5(C)) are outlined below.

As you know, since the Planning Commission meeting dealing with Architecture for the Park City Base Area Master Plan on August 26, 2020, we have made significant changes on Parcel B. Specifically, we have pulled the parking structure all the way back to a 20-foot setback line on the west side. In pulling the parking structure west we have created room to insert 8 townhouse style condo units along Empire Avenue. These townhouse style units have a ground floor garage for each unit, plus 2 stories of living space above. These townhouse units step with the grade along Empire Avenue and create a residential experience that relates to the neighborhood on the east side of Empire Avenue, with front doors and varying rooflines.

Additionally, in response to Planning Commission and community comments we have removed an entire floor from the affordable housing building. This square footage, which will remain affordable housing, was moved to the first floor of the market rate condo building on Parcel B, resulting in an added floor in a portion of that building. We have submitted site plans, and renderings of our revisions demonstrating the changes made.

Findings and Justifications:

1. The increase in Building Height does not result in increased square footage or Building volume over what would be allowed under the zone-required Building Height and Density, including requirements for Facade variation and design, but rather provides desired architectural variation, unless the increased square footage or Building volume is from the Transfer of Development Credits;

The 1998 Development Agreement transferred allowed square footage and density to a consolidated portion of the base area in order to eliminate development in the area now referred to as “Open Space” on the attached Exhibit A from the Development Agreement. While PEG’s current proposal is an increase in volume and square footage over that which would be allowed under the zone-required Building Height and Density on Parcels B-E, the proposal does not increase the square footage or building volume allowed under the Development Agreement and is entirely consistent with the transfer of Development Credits from the Open Space areas contemplated in the Development Agreement and allowed pursuant to the foregoing standard.

We also point out the project is addressing its affordable housing requirements within the four corners of the project, which is a factor that should be considered by the Planning Commission in evaluating the overall density, volume and height of the project. Locating affordable housing within the project adversely affects the overall economic viability of the project, and while PEG is committed to this approach and the non-economic advantages that inclusion brings to the project and the larger base area, some additional flexibility in building height and set back is warranted by that inclusion.

2. Buildings have been positioned to minimize visual impacts on adjacent Structures. Potential problems on neighboring Properties caused by shadows, loss of solar Access, and loss of air circulation have been mitigated as determined by the Site-specific analysis;

Care has been taken to place the buildings such that impacts on neighboring properties and adjacent structures have been minimized and mitigated. PEG has removed one floor from the building along Shadow Ridge Drive (adjacent to the Shadow Ridge Condominium building) and moved that square footage into the market rate condo building along Lowell Avenue, away from immediately adjacent residential product. Eight townhouses were added to the garage façade along Empire Avenue to reduce the visual impacts of the east side of Parcel B. We are not aware of any negative shadow impacts and there is no loss of air circulation or solar access, particularly when measured against the previously approved concept plan for the project.

3. There is adequate Landscaping and buffering from adjacent Properties and Uses;

Generous landscaping and buffering consistent with the surrounding properties is proposed throughout the project, with increased landscaping in two locations where the new base area directly abuts an adjacent property—on Parcel E along the west side and on Parcel D on the south side. Additionally, new well-designed landscaping will be added in all landscaping areas within setbacks along the entire perimeter of the project, which will be a monumental improvement over existing conditions.

4. Increased Setbacks and separations from adjacent projects are proposed;

There are three locations where the proposed project directly abuts adjacent properties. Parcel C on the south side, provides existing vehicular access to the Lodges, while also providing new and enhanced pedestrian access and is set back in excess of 60 feet. Along the west side of Parcel E, the first floor is setback 28 feet and the upper floors step back a total of 35-37 feet. On Parcel D, the south side of the building is setback 29 feet. In each instance, these setbacks are equal to or exceed the existing setbacks on the subject adjoining properties and the setbacks required in the underlying zone.

5. The additional Building Height results in more than the minimum Open Space required and results in Open Space that is publicly accessible;

As previously discussed, the density transfer memorialized in the 1998 Development Agreement set aside 11.40 acres of open space. In addition to the open space identified in Exhibit A of the Development Agreement, PEG is proposing additional open space in the form of 2 plazas accessible to the public, plus additional open space and landscape areas throughout the project. The result is approximately 75% open space overall, all of which is accessible to the public. The proposed publicly accessible open space, moreover, exceeds the “minimum Open Space” required by approximately 15%.

6. The additional Building Height is designed in a manner that provides a transition in roof elements in compliance with Chapter 15-5, Architectural Review, or the Design Guidelines for Park City’s Historic Districts and Historic Sites if the Building is located within the Historic District. If and when the Planning Commission grants additional Building Height based on a Site specific analysis, the approved additional Building Height shall only apply to the specific plans reviewed and approved by the Planning Commission. Additional Building Height shall be specified as a Finding of Fact in the Master Planned Development Approval, in the Development Agreement, and on each plat within the Master Planned Development that includes a Building with an additional Height allowance.

Care has been taken to provide a variety of roof elements including gabled ends, flat roofs, and stepping of roof heights. Specifically in relation to Section 15-5-5: (A) no prohibited architectural styles and motifs have been employed; (b) no prohibited siding materials will be used; (c) proposed design ornamentation is clean and simple, avoiding any highly ornate treatments inconsistent with the character of the area; (d) no more than 3 different materials are proposed on any given exterior wall; (e) no prohibited roofing materials will be used; (f) no roof shapes described in paragraph (f) of Section 15-5-5 are proposed; (g) solar energy systems for the building will be installed in accordance with paragraph (g) of Section 15-5-5; (h) no skylights are currently contemplated; (i) no prohibited window treatments are proposed; and (j) proposed lighting will be in conformance with paragraph (j) of Section 15-5-5.

In accordance with 15-6-5(C), PEG has requested an exception allowing building setbacks in a limited area of the project to be reduced from 25-feet to 20-feet. This reduction is “necessary to provide desired architectural interest and variation.” Something is necessary if it is needed, required or unavoidable by reason of prior conditions or circumstances. As noted above, PEG’s proposal is advanced in the context of an existing Development Agreement that documents the consolidation or clustering of the base area development on Parcels A through D. The Development Agreement also provides for a specified amount of development density, and, importantly, the underlying zoning district allows for a 20-foot setback, as does the approved 1998 MPD.

Advanced in the foregoing context, PEG’s proposal also includes meaningful and expanded public spaces and plazas within the development area, promoting public access and four-season viability for the project. Necessarily, therefore, vertical development in the remaining area is focused within a smaller buildable area, requiring increased flexibility at the margins in order to accommodate architectural interest and variation. Stated differently, in order to approximate but not exceed the allowed density within a context of limited building heights and envelope, an exception to the setback standards is necessary and unavoidable, particularly where, as here, both PEG and the City desire architectural interest and variation.

With respect to architectural interest and variation specifically, the requested exception to setback requirements is based on several factors. While the proposed Master Plan Study utilizes a 20-foot setback in several isolated areas, that setback is predominantly used on Parcel B for only select portions of the building volume on each frontage. In this regard, we note that the average setback proposed for the entire project or village core far exceeds the 25-foot minimum.

Buildings on parcel B have many architectural variations, both vertically and horizontally. PEG has chosen to use both horizontal and vertical variations to comply with 15-5-8(B). The use of both vertical and horizontal shifts provides beautiful architecture and interesting forms. In addition, the large horizontal shifts effectively setback the upper floors of each building, reducing the perceived sense of volume at ground level.

LMC section 15-6-5(C) does not speak to the nuances of evaluating a particular building and its architectural interest and variation in relation to a static setback line, nor does it specify how horizontal deviations and upper floor step-backs should be evaluated or factored into the Planning Commission’s determination as to whether an exception to the setback standard is justified. PEG respectfully submits, however, that the modest exception to the setback requirement PEG has proposed (i.e. five feet of reduced setback applied to portions of the volume of each building), is necessary to facilitate and promote the architectural interest and variation created by the proposed horizontal variations and the stepping back of the upper floors of the subject buildings. It is also necessary to accommodate the approved development density, development clustering, on-site affordable housing and open space preservation contemplated by the existing Development Agreement and PEG’s current proposal for expanded plazas and public spaces, which themselves also create increased architectural interest and variation. The alternative would be a 25-foot setback for the entire volume of the subject buildings, which would result in vertical walls with limited to no horizontal shifts and only such vertical shifts as are necessary to comply with 15-5-8(B). PEG submits that its proposal provides a far more attractive and functional project, and that the requested exception is necessary to provide the architectural interest and variation the LMC

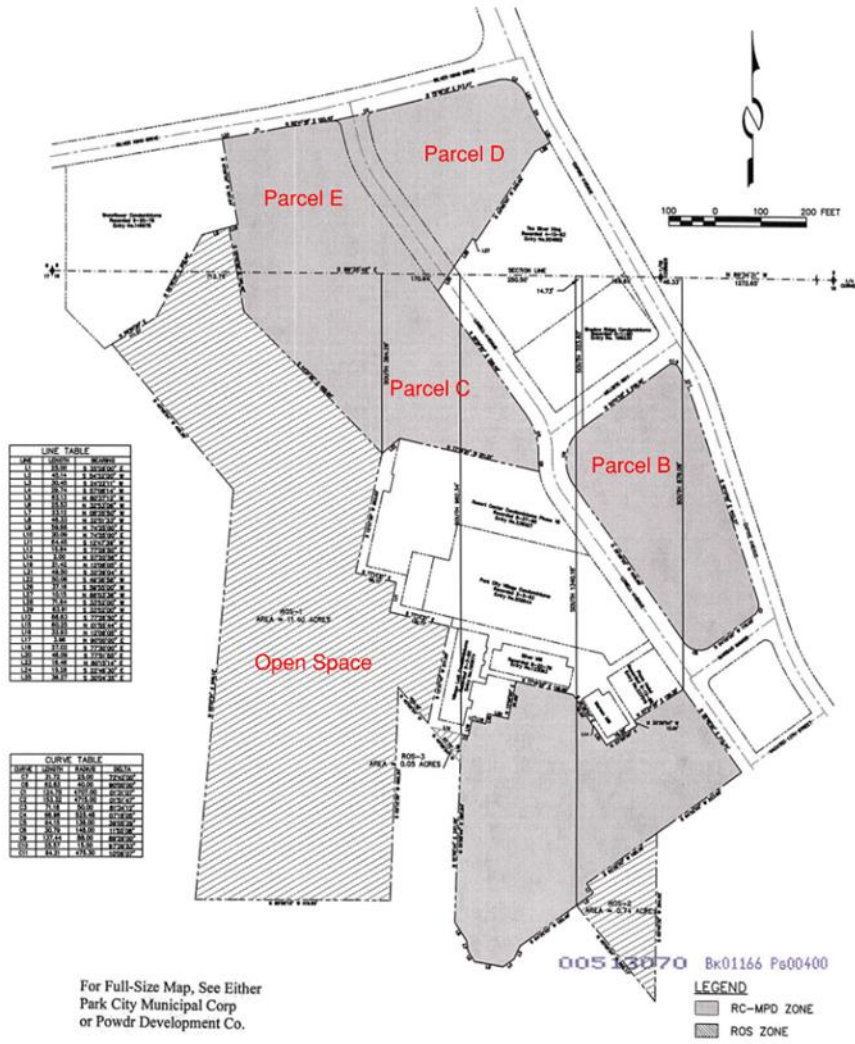
promotes by placing the possibility of the requested exception within the purview of the Planning Commission's decision making authority.

Sincerely,

A handwritten signature in blue ink that reads "Robert Schmidt". The signature is written in a cursive style with a large, stylized "R" and "S".

Robert Schmidt P.E.
President

Exhibit A



November 12, 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 very concerned about the negative impacts of the proposed development at the base of the Park City Mountain Resort as well as on downtown Park City and the adjacent historic and residential neighborhoods. Although RRAD understands that the property owner has certain vested development rights pursuant to the 1998 Park City Mountain Resort Development Agreement ("Development Agreement"), the newly proposed the Park City Base Area Lot Redevelopment Master Plan Study ("New Master Plan") greatly exceeds and materially deviates from the development approval. RRAD is committed to ensuring that the developer is held to the strict terms of the Development Agreement and that no amendment is approved that would be detrimental to Park City residents or in violation of the LMC.

New Master Plan Must Comply with Development Agreement and LMC

On July 8, 2020, the Planning Commission correctly determined that PEG Development's New Master Plan would result in a substantive modification to the Development Agreement. PEG proposed to amend the Development Agreement by simply substituting the New Master Plan for the expired 1998 PCMR Base Area Master Plan Study Concept Master Plan ("CMP"), which was incorporated into the Development Agreement as Exhibit D. Thus, the Planning Commission concluded that PEG's amendment application justified review of the entire Development Agreement as well as the New Master Plan.

As noted in the August 26, 2020 Planning Commission Staff Report, the Development Agreement was the result of much give-and-take between the developer and Park City. Certain development rights in certain areas of the project were approved in exchange for certain commitments and concessions by the developer. The developer has already taken advantage of the benefits it negotiated for in the Development Agreement in developing

Parcel A. It must therefore be held to the requirements imposed in the Development Agreement in developing the remaining parcels.

The New Master Plan must conform to the mandatory requirements of the Development Agreement. The Planning Commission cannot allow the applicant to deviate from any of its obligations under the Development Agreement unless such deviations are more favorable to the City and its residents and the City makes clear and expresses findings justifying those deviations. It cannot allow the developer to renegotiate the deal now or allow it to develop anything more than what was granted under the Development Agreement and the then-current CMP.

The plain language of the Development Agreement requires such compliance. Although the CMP approval has expired, the Development Agreement repeatedly incorporates the limitations found in the CMP into the body of the Development Agreement and requires that development conform to those limitations. The Planning Commission must therefore ensure that the New Master Plan conforms to the conditions and requirements imposed in the CMP.

The new plan must also conform to the provisions of the current LMC. Any variances that the applicant seeks in its new plan can only be granted in strict accordance with the provisions of the current LMC, including those governing setbacks and building heights.

New Master Plan Materially Deviates from the Development Agreement

The Planning Commission or Staff have already identified numerous areas in which the New Master Plan deviates from or fails to comply with what was approved in the Development Agreement. They have also identified numerous areas where the New Master Plan fails to comply with the LMC. RRAD concurs in these conclusions, as noted below. It has also identified other areas where the New Master Plan does not comply with the Development Agreement or the current LMC.

Exceeds Maximum Gross Square Footage. The New Master Plan exceeds the approved density in the Development Agreement by 16,048 square feet due to the incremental above-ground parking facilities vs. the CMP. The Development Agreement mandates that the "maximum square footages, unit equivalents and volumetrics as described in the [CMP] are the maximum permitted for each development Parcel." (DA § 3.1.) The New Master Plan therefore does not comply with the Development Agreement. The developer cannot come back now and demand more square footage than it agreed it would develop in order to receive approval of its Development Agreement. It also cannot claim entitlement to additional square footage under the LMC. Under current zoning, the New Master Plan already exceeds what is allowed by 381,182 square feet.

Reallocation of Density. In the New Master Plan, the developer is also proposing significantly more density on Parcel C than it was allowed under the Development Agreement. Again, the Development Agreement expressly stated that the "maximum square footages, unit equivalents and volumetrics as described in the [CMP] are the maximum permitted for each development Parcel" and that "square footage will not be transferred to another parcel." (DA § 3.1) The resort and accessory uses within Building C in the New Master Plan are 53,967 square feet in contrast to the 15,900 square feet allowed in the Development Agreement. According to the table, these uses are supposed to be only 10%

of residential square footage (which is 129,370 in the New Master Plan), or 12,937 square feet. The New Master Plan therefore does not comply with the Development Agreement. There is no legitimate basis for the Planning Commission to agree not to enforce this mandatory condition of the Development Agreement.

Building Heights. The buildings proposed in the New Master Plan have maximum heights ranging from 79-87 feet above grade—more than double the 35-foot maximum allowed in the LMC. These building heights exceed even the generous variances that were granted in the original CMP. And unlike the CMP where the highest buildings were near the mountains and away from residential neighborhoods, the tallest buildings in the New Master Plan are directly adjacent to the low-scale homes on Empire.

This is directly contrary to the Development Agreement. The Development Agreement required the buildings to be “sited, massed and comply with the height” in the CMP and states that “building heights represent a maximum.” It further provided that the “higher buildings [be] placed closest to the mountain backdrop.” Additionally, the Development Agreement provided that the roof steps shown in the CMP “are a significant design element that cannot be substantively changed without demonstrating that any alternate design has not additional adverse massing and/or significant shadow impacts.” The developer has not made, and cannot make, any such showing under the New Master Plan.

There is no legitimate basis for granting these excessive height variances now as the current plans do not include the significant architectural variation in height and massing that contributed to the height exceptions in the original CMP. And in the original CMP portions of the buildings requiring the height variances were located in the center of the Parcels or adjacent to the mountain rather than on the street fronts or adjacent to much smaller residential buildings and single-family homes as in the New Master Plan.

Furthermore, when considering the building heights proposed in the New Master Plan, it is critical to keep in mind that the proposed heights are often measured from existing grade at the highest elevation on a building site despite the fact that many of the building lots are steeply sloped from front to back. For example, the eight-story building/parking garage proposed for Parcel B would be approximately 63 feet above grade if measured from Lowell. But when measured from the corner of Empire and Shadow Ridge—the portion directly across the street from the modest single-family homes—that same portion of the building measures *approximately 100 feet above existing grade*. A similar condition exists on Silver King Drive. These excessively tall buildings will absolutely dwarf surrounding homes. The Planning Commission must keep in mind the reality on the ground when considering height variances and deny any such requests.

Although Staff claims that a step-back above the parking garage would minimize the impacts on the single-family homes across Empire Avenue, that is simply not true. The step-back does not even begin until the fourth story of the building above the parking garage and even then there is only a minor step-back. And Empire Avenue is a very narrow, historically proportioned street, so the space between the homes on Empire and the imposing four-story parking garage with reduced setbacks would be even less of a buffer. And nobody walking on the sidewalk or driving along Empire next to the parking garage would notice the step-back at all.

Setbacks. The New Master Plan calls for setbacks that are not allowed in the LMC and are different from what was approved in the LMC. The setback variances are not allowed under the LMC because they are not "necessary to provide desire architectural interest and variation." They are simply requested to add more square footage and bulk to the project. The reduced setbacks would also not allow sufficient room for snow shedding off of large multi-story buildings, as is obvious from the developer's own drawings.

Reduced setbacks would be particularly inappropriate on Empire Avenue given the residential character of the street and the very large façade of the building and the narrow street separating the homes and the building. It also appears that there is a large mechanical room under Building B along Empire and a loading dock under Building E along Silver King that could create extensive noise and traffic disruption for neighboring properties.

Architectural Detail. The Development Agreement included eleven pages of architectural guidelines that are completely different than what the developer now proposes in the New Master Plan. Those guidelines provided that the design should reflect "the history and charm of the Park City area as a rustic mining town and present day destination resort." The drawings included in the original CMP have the feel of a charming residential alpine town consistent with the historic character of Park City. The New Master Plan conveys nothing of the sort and is incongruous with the approved design, the surrounding historic neighborhood, and Old Town Park City. The current design is a generic, soulless development that could be found in any American suburb. The façades of each building look virtually identical and have no architectural interest or variety, as required by the LMC. They look nothing like the architectural designs that were approved in the Development Agreement.

For example, Parcel B was approved as "at least four distinct building masses to provide scale, create vistas through the buildings, allow access to open space and prevent the appearance of one monolithic structure." The design had to "create a predominantly residential scale and character by utilizing numerous breaks in each building mass" and "provide varied setbacks at all street-front locations to prevent the massing from appearing fortress-like." "[S]etbacks shall be generous and pronounced along Empire Avenue and [Shadow Ridge] so as to mitigate building and shadow impacts on neighboring structures." Parcel B also had to include "at least two significant pockets of open space each of which is visible accessible (free and clear, without occupied overhead encumbrances) from at least one semipublic pathway of at least 30'-0" in width." The design for the Parcel B parking garage/building in the New Master Plan is precisely the opposite of what was approved.

The developer must not only comply with the architectural design requirements of the Development Agreement but also all design guidelines under the LMC. "If the architectural design guidelines (such as materials, color and fenestration) for Park City become more restrictive in the future than those for this project, the more restrictive guidelines shall apply...." (DA 2.1.3.)

View Corridors. Section 15-6-5(G)(1) of the LMC requires that "[u]nits should be clustered on the most developable and least visually sensitive portions of the Site with common open space separating the clusters." The Development Agreement accordingly identified two critical view corridors in Park City that had to be maintained in any development—the 14th Street view corridor and the Empire/Silver King view corridor.

The Development Agreement required "view corridors from 14th Street to the Resort Center and from Parcel B to the existing Silver Mill tower/mountain access route so as to reinforce Parcel B's relationship to the community and the existing Resort Center facilities." Currently, pedestrians walking up 14th Street can see the entire mountain framing the resort. The original CMP preserved that view corridor with meaningful space between buildings and pedestrian walkways. In contrast, the proposed New Master Plan would eliminate that 14th Street view corridor and replace it with a large 3 to 8-story parking garage and condo building. Although the developer has included a cut-out at the top of the building in an apparent attempt to comply with the view-corridor requirement, it would do no such thing. A pedestrian standing at the intersection of 14th Street and Empire (elevation 6922') would looking directly at the parking garage (elevation 6962') rising 40' from street level and, above that, the view would be completely obscured by the condo towers on the site (roof elevations 7001' and 7016'), which rise 74' and 91' above 14th Street. There is no view corridor whatsoever despite the developer's claims and their presentation materials. Nobody at street level—and certainly no one on 14th Street—would even have a glimpse of the mountain through the parking garage. And there will be no pedestrian access through the parcel from 14th Street at all as was called for in the CMP.

Similarly, the iconic view corridor from the corner of Empire and Silver King would also be significantly impaired due to the monolithic massing of Buildings C, D and E. Again, this is one of the signature views of Park City found on many postcards and photographs. The buildings on Parcels C, D and E would block important views of the viewshed from street level.

Parking Garages. One of the most significant deviations from the CMP is the configuration of the parking facilities. The 1997 MPD specifies that skier parking will be in "underground structures" and that 1200 surface stalls are to be replaced with 1800 underground stalls. One of the principal reasons for the substantial increase in square footage in the New Master Plan is due to a four-story above-grade parking garage on Parcel B. (Although a Staff report stated that the parking garage was only three stories above grade, at the corner of Shadow Ridge and Empire Avenue it would actually be four stories above grade.) The New Master Plan also calls for a very large parking garage on Parcel E. The original CMP called for the parking to be spread out equally between the parcels and located entirely below grade.

This major deviation in the New Master Plan is not only contrary to the mandatory provisions of the Development Agreement prohibiting shifting of density but would also result in a massive parking garage on Parcel B, which totals 311,166 square feet and spans virtually and entire block in the middle of a historic Old Town neighborhood. It would be directly across the street from modest single-family homes on narrow Empire Avenue and would obscure the views at the iconic intersection at 14th and Empire. Under the New Master Plan, that corner will simply be a seven-story monolithic parking garage and condo building that accounts for over 50% of all parking on the entire site and over 65% of all day-skier parking. This is the worst possible location on the entire site for a parking garage of this size.

The developer responds merely that the homes on Empire Avenue were not there when the original CMP was approved and presumably should not be taken into consideration now. But, as the Planning Commission has concluded, the New Master Plan is a substantive amendment to the Development Agreement and must be reviewed under now-existing

conditions and current ordinances. The Planning Commission cannot simply ignore the homes on Empire Avenue or other neighboring streets, as the developer intends.

The developer also attempts to deflect attention from this large parking garage by slapping some fake windows on the façade in its drawing mock-ups. But anyone who has seen such garage façades knows that they lack human scale and detail and look nothing like this. The Planning Commission need only consider the much smaller China Bridge parking garage on Swede Alley to have an idea of what this immense parking garage would actually look like, in contrast to the way the developer has depicted it.

Furthermore, as the Planning Staff correctly notes, relocating most of the day-skier parking onto Parcel B in a large garage would double the amount of parking on that lot and force a significant amount of the traffic to circulate through the entire resort area on Lowell Avenue to enter the garage. At the end of each day, it would also generate significant traffic volume from three separate garage exits (on Shadow Ridge, Manor Way and Empire) onto Empire Avenue through that low-scale, residential neighborhood, where residents often need to back their cars out of their driveways onto Empire to exit, creating a very dangerous traffic situation. Cars entering/exiting the garage in Parcel E will also be driving through the residential neighborhood of Three Kings Drive, creating safety and quality of life issues noted throughout this memo. Yet, the CMP required a "covered arcade on the buildings western edge creates a passage way from Three Kings to the resort's new base operations." (CMP at 145.) This would eliminate need for pedestrians to cross in front of the garage entry/exit on Silver King and then have to travel up Lowell to Resort Center.

Moreover, this plan would force much of the pedestrian traffic to the resort onto a handful of narrow 8-10' sidewalks. Those pedestrians, including all of the pedestrians parking in the garage, would have to pass the entrances to the parking garage at the very time that all of the cars are trying to enter or exit the garage. They would then be forced to cross two lanes of one-way traffic on Lowell Avenue to reach the resort entrances at the same time all of the vehicles have to traverse Lowell to reach the resort or the parking garages. Similar pedestrian/vehicle conflicts will occur on Silver King Drive. This plan is a traffic and safety nightmare.

Again, the parking plan as originally approved was an integral component of the Development Agreement. The current New Master Plan deviates from the Development Agreement in virtually every respect and in ways that will dramatically increase traffic flow through residential Empire Avenue and Three Kings Drive and create pedestrian and vehicular traffic logjams. And it will result in a large, monolithic parking garage on one of the most iconic corners of Park City. Yet, the design guidelines in the Development Agreement expressly state that "[l]arge monolithic structures are atypical in Park City." There is no legitimate basis for the Planning Commission to allow this material deviation from the Development Agreement.

Day Skier Parking. The Development Agreement requires an additional 600 parking spaces be provided in addition to the 1,200 that currently exist, for a total of 1,800 spaces for day skier parking. The New Master Plan does not include the 600 additional spaces required by the Development Agreement because the developer claims that the additional spaces are not needed. The developer has not provided sufficient evidence to establish this and simply prognosticated that the previously calculated numbers of skier vehicles is excessive. For example, they argue that there would be an average of 3.7 skiers per

vehicle. RRAD agrees with the Planning Department that a 40% increase in AVO is unrealistic and unsupported by the evidence submitted by the developer. The Planning Commission cannot take the risk of approving a development with 400 too few commercial parking spaces and 600 too few day skier parking spaces based on overly optimistic guesswork. The New Master Plan also does not include any employee parking.

Hotel Parking. The New Master Plan also calls for 183 parking spaces in the hotel. It appears that all of that parking is valet parking that can only be accessed from a short circular driveway off of Lowell Avenue. More than a handful of vehicles arriving or departing at the same time would cause the traffic to back-up onto Lowell, which is the main artery for resort guests to access the resort and for many nearby residents to access their homes. There is also a major loading dock sharing this single entrance to the hotel, leading to further inevitable traffic congestion and safety concerns.

Parking Mitigation. The Development Agreement requires the developer at a minimum to comply with the parking mitigation plan that was attached as Exhibit K. It further requires that "[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.) The Planning Commission must ensure that this requirement is implemented in connection with any development of the site, even though the developer will not be the resort owner. The development approval must also provide that the limitation on ticket sales be automatic once certain thresholds are met or it will never be enforced.

Sidewalks. The CMP requires that "[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." (CMP at 115.) The New Master Plan proposes sidewalks that are only 8-10' wide and generally located on only one side of the street. This would be unsafe for pedestrians and not remotely sufficient for snow storage.

Traffic and Pedestrian Circulation. In the New Master Plan, the developer is proposing to change Lowell Avenue, Manor Way, Shadow Ridge, and Empire Avenue into permanent one-way streets. Converting Manor Way and Empire Avenue into one-way streets is a material deviation from the Development Agreement and very detrimental to the surrounding neighbors. Imagine a homeowner on Empire Avenue attempting to drive to her house at the beginning or end of a ski day. She would have to drive up Silver King and then navigate through bumper-to-bumper vehicle and bus resort traffic on Lowell, passing the hotel entrance and loading dock, parking garage entrances, Uber/Lyft/black car/day skier drop off and extensive pedestrian traffic, down Manor Way or Shadow Ridge past the parking exits, until finally hitting Empire, which collects all of the exiting traffic from the resort. Even under current conditions, the Planning Staff estimates that it can take 35-45 minutes for buses to loop around the resort during peak periods. However, with the proposed development changes, the time to loop through the resort will increase dramatically for all vehicles. Additional issues that will add to the traffic, but have not yet been addressed by the developer, include the incremental 800 vehicles circulating through the resort to park in the Parcel B garage, thousands of pedestrians from both housing and parking areas trying to cross Lowell to get to and from the resort, and local citizens trying to get to their homes on Lowell, Empire or Northstar Drive and Kings Crown. The handful of narrow pedestrian crossings will not be sufficient to handle the flow and pedestrians will spill

out into the streets. Additionally, all utility and construction vehicles servicing homes and businesses on Lowell, Empire and Northstar Drive and Kings Crown will have to circulate through the resort and navigate resort traffic to get to their job sites. Most importantly, given life safety concerns, emergency vehicles urgently needed on Empire, Lowell or Northstar Drive and Kings Crown will now have to circulate through the resort before getting to the home in need. If a fire breaks out on Lowell, or someone needs an ambulance on Empire, those emergency vehicles will have to traverse the resort traffic on Lowell that could cause these vehicles to be severely delayed with potentially catastrophic results.

Additionally, routing all traffic in the manner shown on the New Master Plan will create a pedestrian nightmare. Even accepting the developer's overly optimistic 3.7 AVO, that would mean 2,800 pedestrians entering and exiting the parking garage on Parcel B at peak hours each day. Those thousands of pedestrians will be walking to and from the garages at the same time that all of the vehicles are attempting to enter and exit those garages as well. The pedestrian traffic will interfere with garage access, vehicle circulation, drop-off zones, buses, etc. There are also hundreds of local pedestrians who walk to the resort from surrounding neighborhoods via Park Avenue, Woodside Avenue, Three Kings, Thaynes Canyon, Payday, 14th Street, 15th Street and beyond. Many others park on local streets (legally and illegally) or at the retail stores across Park Avenue and walk to the resort from there. All of these pedestrians will add to the large crowds attempting to access the resort from the parking garage. The handful of narrow crosswalks shown on the drawings will not accommodate these thousands of pedestrians each morning and afternoon in the midst of heavy traffic.

The roundabout proposed at the intersection of Empire and Silver King also cannot possibly accommodate this volume of pedestrian traffic. Roundabouts are not designed for pedestrians at all, much less the hundreds of pedestrians that will be attempting to traverse them at the same time. Curiously, the most recent plans from the developer eliminated the second roundabout that it had initially proposed for the intersection of Lowell and Silver King, explaining that it would be safer for pedestrians to have a signalized intersection. Yet, the Empire/Silver King intersection has many times more pedestrian traffic than the Lowell/Silver King intersection. A roundabout at that location simply will not be safe.

Traffic is already unbearable in this area and has spill-over effects into the surrounding neighborhoods such as Thaynes Canyon via Three Kings Drive, and the New Master Plan will make traffic materially worse. The developer is required to propose a Transportation Demand Management Plan in the Development Agreement but still has not done so.

Open Space. It is unclear from the New Master Plan how the developer calculated as open space or what it included in those calculations. Under Section 15-15 of the LMC, "open space" must be public. Yet, it appears that the developer has included in its open space calculations areas that are not open to the public. For example, in Parcel E, it appears that the developer included private club space and amenities space as open space. It also appears that the developer has counted a hotel patio and plaza dedicated to private guests. These areas do not qualify as open space under the LMC.

Affordable Residential Housing. The New Master Plan is required to comply with the Development Agreement and the Affordable Housing Guidelines in effect at the time of site-

specific approval. RRAD is reviewing the developer's calculations and proposals and will respond once that review is complete.

Employee Housing. The Development Agreement requires "off-site housing for 80 PCMR employees on or before October 1, 2003." (DA § 2.2.) The New Master Plan does not comply with this provision in two ways. First, the developer proposes that employee housing be located *on-site* rather than off-site. That is not allowed under the Development Agreement.

The Development Agreement further 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.) This means that off-site employee housing for 80 PCMR employees must be completed and ready for occupancy *before* the city can approve such MPDs.

The Planning Department erroneously suggests in its October 13, 2020 staff report that there is an exception to these requirements if the developer doesn't obtain small-scale MPD approval before October 1, 2003. But, by its plain language, that exception is only available if "there is a downturn in the market." (DA § 2.2 n.1.) There has been no showing of any such thing. Therefore, that exception does not apply here, and availability of the employee housing is a condition to approval of small-scale MPDs for the project. Because the exception does not apply, the conclusion of the Planning Department that approval of Parcel A only "triggered an incremental housing requirement of 23 employee beds" is also incorrect. The Development Agreement required available housing for 80 employees by October 1, 2003 and that requirement must be met before approval of the remaining small-scale MPDs. Yet the New Master Plan does not contemplate completion of such housing until the end of 2023.

Furthermore, to the extent that the developer's entirely new commercial development proposed in the New Master Plan triggers additional employee housing requirements under the LMC, they must provide that additional employee housing in accordance with the affordable housing requirements. All such housing must be on-site under the current LMC requirements.

Employee Shuttle. The Development Agreement also required developer to provide transport of resort employees to and from off-site employee parking areas, off-site employee housing, and local towns including Provo, SLC and the Heber. The developer has never done so and the New Master Plan does not call for a shuttle. The Planning Commission must require the developer to comply with this requirement as a condition of approval.

Delivery. Section 15-6-5(G) of the LMC provides as follows: "Service and delivery Access and loading/unloading Areas must be included in the Site plan. The service and delivery should be kept separate from pedestrian areas." Yet, the New Master Plan appears to show a service and delivery entrance for the hotel on Parcel C accessed directly from Lowell Avenue that would actually require delivery trucks to back up into it against one-way traffic on Lowell Avenue—the central thoroughfare to access the resort. This service entrance is also dangerously close to the UBER/Lyft/black car/skier drop-off area and is in the path of major pedestrian ski traffic from the parking garages and crosswalks. This is

also an area where pedestrian traffic from the soft plaza and Parcel D condos would be funneled to access the new main plaza, resort center, and mountain.

The Development Agreement further requires that the "final site planning shall orient delivery, service and trash access away from existing residential uses whenever possible." (DA § 2.1.3.) The New Master Plan calls for a major loading dock off of Silver King Drive, which will be accessed from Three Kings Drive. Three Kings Drive has numerous city bus stops and is barely passable in the winter for two oncoming vehicles due to extremely limited sidewalks. This road serves numerous residential buildings and leads directly into other additional residential neighborhoods with and extensive pedestrian traffic that will now have to accommodate delivery trucks and day skier traffic as well. The Planning Department has advised that the developer must discourage resort through-traffic on Three Kings Drive. Exhibit K of the Development Agreement expressly states that traffic for both delivery and day skiers should not be funneled towards Three Kings Drive and that left turns out of Parcel must be prohibited. That is not reflected in the New Mater Plan.

Mass Transit. Section 2.1.4 mandates that the "Bus Drop Off Area must be improved." The New Master Plan provides for only four bus spaces but the city's traffic consultant, AECOM, has concluded that that at least eight spaces are needed. The Planning Department has concluded that the bus stop and mass transmit plans are woefully inadequate. The one-way traffic circulation proposal around the site would also result in the loss of bus stops.

Medical Clinic, Helicopter Access. RRAD requests details on emergency vehicle access and egress, including a helicopter landing site.

Construction Management. The Development Agreement requires the following: "At a minimum, those Parcel-specific construction management plans shall address the following:

- Days of the week and hours when construction is permissible
- Routing of construction traffic so that adjacent residential streets are not affected
- Material stockpiling and staging on site
- Parking of construction vehicles
- Maintenance of pedestrian ways and trails during construction
- Recycling of construction waste, including the minimizing of off-site soil/material transport."

Section 11-14-4(C) of the LMC further requires that delivery location, times and routes must be specified and that times should not coincide with peak times for the area. The developer's construction management plans do not address all of these factors.

Conclusion. The Planning Commission is legally required to enforce the terms and conditions of the Development Agreement and hold the developer strictly within the parameters of that approval. As the Utah Supreme Court has stated, "[a] development approval does not create independent free-floating vested property rights – the rights obtained by the submission and later approval of a development plan are necessarily conditioned upon compliance with the approved plan." *Keith v. Mountain Resorts Dev., LLC*, 2014 UT 32, ¶ 31, 337 P.3d 213 (emphasis added). In every aspect where the New Master Plan does not comply with the Development Agreement, the Planning Commission must

justify any modification it permits as being better for Park City residents than what was approved and ensure that developer is in compliance with all provisions of the LMC.

The developer must be held to what was approved under the Development Agreement and only allowed to build what it agreed to build under the Development Agreement. Having already commenced construction under the Development Agreement with Parcel A, the developer cannot now attempt to shirk the limitations imposed under the Development Agreement for the rest of the site and start fresh with an entirely different, bigger, taller, bulkier, more intrusive and less aesthetically pleasing design. RRAD does not believe that the requested modifications to the Development Agreement as reflected in the New Master Plan benefit the residents of Park City or are permissible under the LMC.

Thank you for your consideration of RRAD's concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nicole', with a stylized flourish extending to the right.

Nicole M. Deforge

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

Alexandra Ananth

From: Christine Smalley <smalleycm@gmail.com>
Sent: Wednesday, October 28, 2020 5:03 PM
To: Alexandra Ananth
Subject: Park City Base Area Dev. - community comment

Dear Alexandra.

Thank you for your work making Park City better. I am an owner of Unit 24 at Snow Flower at 401 Silver King Drive.

I have reviewed the plans for the parking lot redevelopment and have attended the community virtual meetings. I want to share my concerns about:

1. Service Access that is right next to the Snow Flower Building 1 on Silver King Drive. This is designed for trucks and service deliveries. That is certain to meet loud trucks, early am deliveries, door slamming, and reverse warning alarms from the trucks. This is also already at a high-traffic intersection with Three Kings, which is a well-used pedestrian route to the ski lifts. I request that the service entrance not be adjacent to the Snow Flower property.
2. Parking spaces. While the project does include parking spaces, it is not taking into consideration the future increased use with the additional guests. Snow Flower is likely to have guests trying to "overflow" park in our garages and outdoor spaces. This will negatively impact the experience of our owners and guests.
3. Blasting. This has been an issue raised by others but if blasting is required, it could cause damage to the neighboring structures. Rather than require neighbors to be merely informed, I request that pre- and post engineering studies be conducted to ensure damage is minimized and repaired if resulting.

Warmest regards.

Christine Smalley
Snow Flower #24

Alexandra Ananth

From: Heather Currie <zerowaste@recycleutah.org>
Sent: Wednesday, October 28, 2020 4:34 PM
To: Alexandra Ananth
Cc: Carolyn Wawra; Mary Closser; Luke Cartin; Celia Peterson
Subject: Public Comment Today: Park City Base Development - Sustainability

Hello Planner Ananth and Park City Planning Commission,

I have reviewed the Sustainability Design Guidelines for the Park City Base Development as part of today's commission meeting.

I am thankful to see the many items included in this plan to uphold sustainable practices that support both Park City and Summit County's climate goals.

For a number of reasons, it would be great to see how the new development will support optimal waste management and overall landfill diversion.

- Recycle Utah is in full support of Vail's wonderfully bold "Commitment to Zero" which includes "zero waste to landfill". Ski resorts are inevitably large producers of organic waste. When this waste is sent to landfill, it generates harmful methane that works against our climate goals. We are relieved and grateful that Vail takes this commitment seriously.
- Our local landfill is currently the largest generator of methane in all of Summit County. The more we divert from this landfill, the less methane we produce. Reducing the amount of methane generated in our landfill is an essential part of Summit County's Solid Waste Master Plan and a necessary action item for meeting Summit County's climate goals.
- In addition to this, Park City is heavily exploring a Zero Waste by 2030 initiative. In Park City's most recent 2020 visioning process, over 90% of residents surveyed called for Park City to have met a zero waste initiative by 2030 - if not sooner.

Thank you for considering these points as you work to generate the highest possibilities in your Sustainability Design Plan.

Gratefully,

Heather Currie
Park City Resident
Zero Waste Communications Specialist, Recycle Utah



HEATHER CURRIE | Zero Waste Communications Specialist

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cell 858-405-4480

www.recycleutah.org

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"Education's purpose is to replace an empty mind with an open one". Malcolm Forbes

Alexandra Ananth

From: Sherie C Harding <sherieharding@gmail.com>
Sent: Wednesday, October 28, 2020 3:39 PM
To: Alexandra Ananth
Subject: Comment on Excavation, Grading, Construction Mitigation

Dear Alexandra,

I tried to submit the following comment in ecomments, but I was not given the opportunity. I did submitted an ecomment on sustainability. The following is my comment on grading, excavation, construction phasing re PEG
Please read this comment during the meeting.

Excavation

I apologize if I missed this data in the master plan document. Where is the soil sample data? It is likely that lead or other contamination exists in the excavation material. The designated hazardous waste dump currently is in Tooele. In that case, the dirt slated for removal, the size of the trucks, the number of trucks, the route trucks will take as they head out of town, all are important factors that impact Park City and Summit County.

Grading

The current elevation along Silver King Drive is 6,885 feet above sea level according to the map on page 95 of the Master Plan Study February 2020. The elevation remains the same 6,885 feet at the corner of Lowell Ave and Silver King Drive. May I suggest the underground garage entrance/exit for Parcel E be moved to the corner of Lowell and Silver King Drive. This solution solves many concerns from neighbors, because at that point, a sign could be placed in the median of Silver King Drive reading, "Residential access only beyond this point."

Construction Phasing and Mitigation

Loading and unloading of construction materials and the proposed location for storage of construction materials should be away from residential neighborhoods. Currently, proposed construction material, loading in and loading out, for Parcel E is exactly in the face of neighborhoods, Snow Flower and Three Kings. Please mitigate with a more suitable location.

Thank you,
Sherie C. Harding

--

Sherie C. Harding
PhD, Paleontology-Ichnology
Department of Geology and Geophysics
University of Utah
Salt Lake City, UT 84112-0102

Alexandra Ananth

From: Doug Lee <mrdouglee@aol.com>
Sent: Wednesday, October 28, 2020 3:01 PM
To: Alexandra Ananth
Cc: der0813@aol.com
Subject: comments on the Base Area Development

Hi Alexandra:

I was unable to submit my comments electronically due to the 2000 word limitation on the web site so I am doing so via email.

My family are owners of 1356 Empire Ave. and I am submitting written comments for tonight's Planning Commission meeting on the Park City Mountain Base Area Development on behalf of the Responsible Resort Area Development ("RRAD") Coalition.

First of all, I wanted to let you know that RRAD expects to provide extensive comments on PEG's Site Planning/Programming and Traffic/Transit submissions shortly, so I will reserve my comments on those areas for later.

With regards to Construction Phasing and Mitigation and Sustainability, I wholeheartedly endorse the comments you have already received from Deb Rentfrow and Sherie Harding.

In addition, I'd like to add the following:

Construction Phasing and Mitigation

1. The developer has not addressed the risk of environmental contamination given the amount of excavation and removal of soil from the site, a significant portion of which is currently proposed to be deposited in fill sites on the Mountain as discussed in Deb Rentfrow's email
2. Construction fencing is proposed to surround the perimeter of each phase, extending to the actual street bed, completely consuming what little sidewalk space we have and increasing life safety risks to pedestrians
3. Snow removal, a chronic problem on these parcels, is proposed to be taken "off-site" but the location of, or logistics for, this snow removal is not disclosed
4. The radius/swing of each tower crane overlaps our small scale, dense residential neighborhoods. PEG does not address the danger to pedestrians below from falling materials, snow, ice, etc.
5. According to the staff report, road access and circulation are not expected to change during construction. However, construction deliveries are expected to continue throughout the year as work commences on each Parcel. Given our already gridlocked Resort Area roads, such as Lowell and Empire, this will likely result in increased traffic delays and life safety risks due to access challenges for emergency vehicles
6. The construction process mentioned above on our streets and parking lots will conflict significantly with the operation of ski operations in the winter and hiking/biking operations in the summer. How will these operational challenges be discussed (and managed) for the benefit of local business owners?

Utility and Fire Protection Design

1. Planning Staff noted numerous challenges in analyzing water supply, including modeling need to assess fire flows and water quality requirements
2. In addition, Staff has cited the potential need for water line upgrades on Lowell and storm water improvements
3. PEG's submission acknowledges that some of the Parcels will not be able to meet the requirements of aerial fire apparatus access roads. And some areas of the buildings will exceed the 150' travel distance from fire department access to the exterior walls on the first story so there will need to be exterior standpipes outlets along the perimeter of the buildings where compliant fire department access is not viable

The Staff report mentions that discussions are underway with PEG on many of these items. My question is – when will these very important issues be clarified and presented to the public?

Thank you for your cooperation and assistance.

Kind regards,

Doug Lee

Alexandra Ananth

From: deb <der0813@aol.com>
Sent: Wednesday, October 28, 2020 2:01 PM
To: Alexandra Ananth
Cc: bvhutah@gmail.com; js_adler@yahoo.com.au; mrdouglee@aol.com; nhlazenby@hotmail.com; richwyman@live.com; sherieharding@gmail.com
Subject: Comment for Planning Commission meeting 10.28.2020

Alexandra,

As the e-comment format only allows for 2000 characters, I'm sending this email to add questions and concerns regarding the Construction Phasing and Mitigation and Fire portion of tonight's review. Please share the following:

Good evening, I'm with the newly formed RRAD Responsible Resort Area Development Coalition. After reviewing the staff report and applicant's documentation, these are my questions/concerns with regards to Construction Phasing & Mitigation and Fire.

Applicant is requesting construction hours of 7am – 9pm Monday – Saturday and 9am-6pm on Sundays. Dark Sky compliance during late winter and fall months would not be possible with these hours and the quality of life will be seriously impacted for all residents in the surrounding area (Park Avenue, Woodside, Silver King, Lowell, Shadow Ridge, Empire, 14th and 15th) at a minimum.

Applicant has not identified where the construction worker/employee parking will be located off-site nor where the construction administrative buildings will be located and if they are mobile during the phasing.

Fill sites on the mountain as drawn will clearly impact hiking and biking traffic and possibly ski runs. This is in direct conflict with detail provided in the staff report *Exhibit A LMC 15-6-6(G) The MPD, as conditioned, provides amenities to the community so that there is no net loss of community amenities*. In addition, this will remain an issue after construction is complete as with the current proposal, access to trails for hiking and biking will be significantly more difficult with a multi-level concrete plaza between the parking and the access point(s).

With regards to Fire -

Planner Ananth states Fire Department has concerns that PEG is addressing. When will the additional answers to concerns be required and made public? Will it be prior to a vote?

Does the applicant also have to address Fire safety/mitigation concerns during the construction process? For example, access to neighboring residential areas on Lowell, Empire, Silver King and Three Kings where their construction delivery entrances and staging will be in place.

Finally, with the building density, setbacks and heights all still under review, as well as traffic, it seems anything submitted by the applicant regarding tonight's agenda items - Sustainability, Construction Phasing & Mitigation and Fire - would not necessarily include accurate data or detail for a decision on approval.

Thank you for reading this email during the public input of the meeting.

Sincerely,
Deb Rentfrow

Alexandra Ananth

From: Lynn Barclay <lebarclay3@gmail.com>
Sent: Wednesday, October 28, 2020 7:16 AM
To: Alexandra Ananth
Subject: transportation comment-snowflower

Good morning,

I own a Snowflower unit and I'm concerned about Silver King drive access. Currently Silver King branches off before the parking lot entrance. The new design changes this to one entry, with 2 roundabouts to navigate. Circle traffic will be slower than a right turn off into our complex. We are concerned about traffic backing up at the entranceway and making access to Snowflower slow and cumbersome.

I am requesting the traffic commission consider adding a third lane upon exiting the first roundabout. This would be dedicated for Snowflower and Silver King inhabitants. Right lane EXIT only, no access to Ski area. There are already 3 lanes exiting the complex. Please provide this suggestion to the committee and share their feedback.

I am also concerned about access to Snowflower during road construction. What is the plan for access during construction?

Thank you for your assistance in this important matter.

--

Lynn Barclay

Alexandra Ananth

From: Carolyn Wawra <director@recycleutah.org>
Sent: Tuesday, October 27, 2020 11:12 AM
To: Alexandra Ananth
Subject: Public Comment: Park City Base Development - Sustainability

Hello Planner Ananth and Park City Planning Commission,

I have reviewed the Sustainability Design Guidelines for the Park City Base Development as part of Wednesday's commission meeting.

I applaud the efforts surrounding energy and water efficiency and tracking protocols in place to ensure assigned goals are accomplished.

However, I don't see anything regarding waste addressed (trash, recycling, compost) and would like to see this considered in the planning phase, as Park City is heavily considering pursuing a Zero Waste by 2030 initiative.

I realize this is a work in progress, but wanted to ensure this was considered before it was too late.

Thank you,

Carolyn Wawra
Snyderville Basin Resident
Executive Director, Recycle Utah

--



CAROLYN WAWRA | Executive Director

435.649.9698 | PO Box 682998 | Park City, UT 84068

www.recycleutah.org

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Alexandra Ananth

From: Trent Davis <tdavis@compass-management.com>
Sent: Friday, October 23, 2020 3:50 PM
To: Bruce Erickson; Alexandra Ananth
Cc: Sarah Hall; John Kenworthy; John Phillips; Mark J. Sletten; Laura Suesser; Douglas Thimm; Christin VanDine
Subject: PEG

Dear Park City Planning Commission and Planning Department,

Overall Parking and Transit

For years there has been considerable talk about traffic problems not only at the base of PCMR but also Deer Valley and Main Street. Yet very little in solid solutions and action has occurred. Addressing traffic does not start at the PCMR base area, it starts at HWY 40 / 248 and 224 / Kimball Junction. If this not resolved first, than whatever PEG does at the base will have very little effect on traffic and congestion. As soon as buses leave the Resort, they will be in the same traffic that exists throughout all of Park City.

There are many transit issues associated with a 40 plus old base area such as PCMR. But the expectation cannot be that it is now PEG responsibility to solve them all. And in many cases it has to be accepted that there really is no viable solution to greatly improve the issue. In my opinion you can spend a lot of time, effort and money on something that cannot be fixed.

There has been a lot of discussion over bus lanes needed to be built by PEG. I am unaware of any bus lanes the City has put in the last 20 years. Dedicated bus lanes need to be installed in all areas throughout town and from the major entry points, in addition to reservable traffic lanes, otherwise anything you do at the base will not help solve these issues. If the goal is to reduce vehicle traffic, smog and congestion coming into the base area, there needs to be a good reason for people to leave their vehicles behind. You cannot expect visitors, and employees to use a bus or shuttle system that does not save them time, money and runs consistently.

A overall transit plan that includes Deer Valley , Main Street, Prospector and PCMR will benefit everyone. By not having a overall plan in conjunction with the PEG development is essentially putting band-aid on the overall issue.

Parking:

Reducing congestion at the base starts with separate parking lots for employees and visitors at the entry points to Park City. Most of my employees come from Kamas and Heber. At times they sit in morning and afternoon traffic for up to 45 minutes trying to enter Park City. Shuttles must run consistently and timely for the employees of all areas of Park City not just the PCMR base to feel comfortable to use these lots.

Although there have been comments about PEG providing more parking at the base, there also must be a conversation about what the county and city will do to develop lots that service all of Park City and its three ski hill employees. We do not think it would be unreasonable for the lodging community, employers or their employees on Main street, Prospector, the Canyons, Deer Valley and PCMR to help pay a wintertime fee to help provide shuttle service, pay for utilities and help keep them maintained. I for one would be willing to consider contributing to this for my retail tenants at the base.

Until a overall parking plan for visitors and employees alike is developed and implemented, anything Peg would do would be putting a band-aid on the problem.

Lot B Parking:

Like the Transit Center, any reduction in parking stalls on Lot B, at the very least, less than what currently exist, will have a devastating effect on all the existing base area lodging and commercial. We are opposed to any significant reductions in this parking.

Base Area Transit Center:

The commission is aware that moving the Transit Center is opposed by multiple interest at core of the Park City Mountain Resort base. As previously expressed, all the base area lodging and commercial have been dependent on this bus traffic for over 30 years. Moving the Transit Center to the North side of PEG'S development would be disastrous to all those affiliated with the base area and our guests.

We would be willing to consider seeing the existing Transit Center renovated and another Transit Center at the Northern end of the development. The size and topography of the area lends itself to two Transit Centers and smaller bus drop- off and pick- up zones.

Pedestrian Traffic

There has been considerable talk of a bridge from Lot B to the area in front of Baja Cantina. This concept forces pedestrian traffic into one choke point and puts all visitors onto the Vail's Plaza circumventing the ice rink level retail and Lodging. This would cause serious harm to the Ice Rink Plaza tenants and The Lodge.

PEG'S design of several controlled crosswalks solves the issue of traffic congestion due to pedestrians and allows all areas of the base to continue to have essential pedestrian traffic.

One potential solution to further reduce auto and pedestrian interaction is to make Lowell Ave from Sliver King Drive one way up to Shadow Ridge intersection. Shadow Ridge would be one way to Empire. Empire remains two way. Auto and shuttle drop off would enter the lot B garage off of Shadow Ridge and Empire. From 8:00 am to 5:30 pm during the winter only, busses , residents with appropriate parking passes, trash removal, deliveries and lodging guests shuttle drop off would be allowed beyond the Lowell Ave and Shadow Ridge intersection, heading towards Manor Way.

Other Items that should be considered:

"Access from the existing base to the Sliver King Dr end of the development". We all want a free flow of pedestrians access throughout the entire base. This helps keep visitors from feeling the need to use vehicles or paid shuttle services such as UBER and encourages bus or walking use. The sidewalks, signage and lighting along Lowell may not be adequate to accomplish this.

Snow storage is a problem through- out all of Park City. Snow melt systems make for a better visitor experience and reduce the amount of toxic salt going onto our storm drains. I encourage thoughts that sidewalks be considered to have this feature.

Thank you again for all your consideration into the above. I would appreciate this being read into the record at the next meeting concerning PEG if at all possible. I hope I got all the commissioners emails correct, but may have missed someone, please see that this gets to all of them.

Trent Davis

Village Venture, Resort Center Limited, Lodge and Loft.

435-731-0115

tdavis@compass-management.com

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Planning Commission

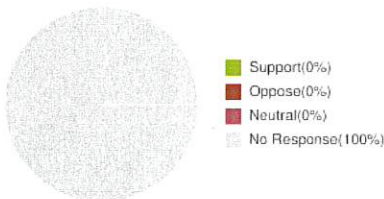
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Agenda Name	Comments	Support	Oppose	Neutral
8.F) Park City Mountain Resort Base Parking Lots - MPD Modification - Replace Expired Exhibit D of the DA, the 1998 PCMR Base Area Master Plan Study Concept Master Plan, With a New Master Plan, Known as the Park City Base Area Lot Redevelopment Master Plan Study. This Hearing Will Focus on Sustainability, Utilities and Grading, Fire Protection and Construction Phasing and Mitigation. PL-20-04475. *Public Input will be taken via e-comments* (A) Public Hearing, No Action Will Be Taken	4	0	0	0

Sentiments for All Agenda Items

The following graphs display sentiments for comments that have location data. Only locations of users who have commented will be shown.

Overall Sentiment

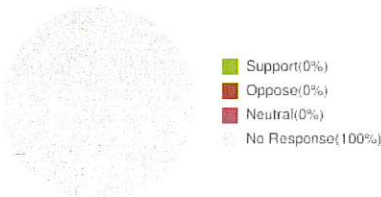


Agenda Item: eComments for 8.F) Park City Mountain Resort Base Parking Lots - MPD Modification - Replace Expired Exhibit D of the DA, the 1998 PCMR Base Area Master Plan Study Concept Master Plan, With a New Master Plan, Known as the Park City Base Area Lot Redevelopment Master Plan Study. This Hearing Will Focus on Sustainability, Utilities and Grading, Fire Protection and Construction Phasing and Mitigation. PL-20-04475.

Public Input will be taken via e-comments

(A) Public Hearing, No Action Will Be Taken

Overall Sentiment



Thea Leonard

Location:

Submitted At: 5:33pm 10-28-20

I am hopeful that the developers will want inject sustainability in all its manifestations into this project. As the City commits itself more and more fully to Net Zero, one can hope this project is a shining example of this new direction. The PC real estate market, being what it is, can command prices that justify a mindful approach throughout the project. Is it too much to ask for...?

- Deconstruction of the site, i.e., deliberate demolition such that anything that still has life finds its way to a re-seller, recycler. This has tax benefits for the owner & reduces the amount of landfill space required, carbon footprint of haulage to the dump, etc.
- Solar Panels & thoughtful orientation of buildings to accommodate maximum on-site energy production. Solar in this mostly sunny place should be something we incentivize on all rooftops.
- Electrification of systems in place of fossil fuels to future-proof as we move toward regenerative utilities.
- Design for widespread EV charging.
- Super-insulation of the buildings.
- Triple pane windows
- Thoughtful entries on the commercial buildings such that we minimize how much we heat the outdoors.
- “Reasonable scale” as it relates to ceiling heights, room sizes, etc. so as to maximize efficiency.
- Design for Zero Waste systems/storage.
- Use of gray water for irrigation.
- Use of recycled/recyclable construction materials where possible.
- Restrictive use of snowmelt systems.
- Green roofs where solar is not practicable.

Aside from the obvious benefits to the environment, investment in building efficiency bakes in a measure of affordability over the long term. As the developers ask for things to streamline their processes and/or improve the complexion of their outcomes, I hope we have the temerity to ask for the things that would make us proud use this redevelopment as an example of how to build for the future. Thanks.

Thea Leonard
435-901-3374
thea@parkcityandy.com

Sherie Harding

Location:

Submitted At: 2:43pm 10-28-20

Please read the following during the meeting

Responsible Resort Area Development (RRAD) supports Park City's sustainability goals

The RRAD coalition supports

1 An improved first-class transit hub at the PCMR Base Area

2 A transit priority (ultimately electric buses) ideally in dedicated, no-traffic lanes

3 A pedestrian priority, wide sidewalks, safe, convenient, and accessible crosswalks. Friendly, accessible, affordable day storage for skis, boards, and boots, which promotes walking, biking, and transit use

4 Park City's resolution 28-2017, Zero carbon emissions by 2030. Emissions from automobile trips to and from the Resort are inescapably linked to the carbon footprint of the Resort

8.SUSTAINABILITY DESIGN GUIDELINES

This section of PEG's Master Plan is vague and lacks detail. Under DESIGN STRATEGIES#4, On-site Renewable Energy. Be specific. Park City has many days of sunshine. Plan for rooftop solar with appropriate orientation.

Nowhere in the SUSTAINABILITY DESIGN GUIDELINES is there mention of tailpipe emissions as a contributor to the carbon footprint of the proposed development. Calculate carbon savings from satellite parking lots. 7.4 miles from Kimball Junction to PCMR, 4.8 miles Quinn's Junction to PCMR. Promote a first-class transit center as part of the sustainability strategy. Promote how it can reduce the carbon footprint.

2020 Community Vision

In answer to a recent survey question, "What do you think are Park City's strengths" Survey Results show, "Engaged Community" ranked highest. That's RRAD! It appears that "Small Town Feel" ranked about 4th. "Transit, climate, & environmental initiatives" ranked about 5th, interestingly above Skiing. Transit, climate, & Environmental initiatives are considered a Park City strength in the 2020 Community Vision Survey. Our town cares about sustainability.

The RRAD coalition hopes for alignment with Park City's sustainability goals. We appreciate this opportunity to participate in the process.

SC Harding

Deborah Rentfrow

Location:

Submitted At: 1:45pm 10-28-20

Good evening, I'm with the newly formed RRAD Responsible Resort Area Development. After reviewing the staff report and applicant's documentation, these are my questions/concerns with regard to Sustainability -

Staff Conclusion: Aspirational in nature and neither concrete nor measurable; they do not commit to any specific goals and metrics for the proposed new base area.

Resolution 28-2017 is referenced by Planner Ananth and it recommends EUI of 25 or below; applicant's EUI target is 30. What is a target – goal, doesn't mean they'll achieve it. In addition, the staff report raises concerns over committing to zero carbon electricity, compliance with dark sky regulations and electric vehicle charging stations. Finally, the weather normalization model they used was based on Salt Lake City, not Park City.

PEG's stance on sustainability is clearly stated on p104 of their submission: "They are private and this Resolution 28-2017 does not apply."

PEG's stance is in direct conflict with Exhibit A, page 285, LMC 15-6-6(L) which states 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 & Green Building program and codes adopted by the PC Building Dept in effect at the time of application.

PEG's stance is also in conflict with LMC 15-6(J) Encourage mix use, walkable & sustainable development and redevelopment that provide innovative and energy efficient design.

Therefore, please confirm Resolution 28-2017 and the Exhibit A codes would apply regardless of PEG being in the private sector and required of the applicant in order to receive approval of their application.

Thank you for reading my comment during the Public Input of this evening's meeting.

Nancy Lazenby

Location:

Submitted At: 12:27pm 10-28-20

Hello. During the course of this project PEG has repeatedly said they are mailing their Community Outreach information to the Residents and the community that live within 300 ft of the Base Area Project. The last mailing they announced was May 13th. I live right across the street from the project on Empire and have never received ANY mailed notices. I have spoken with several of my neighbors and they also have never received any mailed notices. Most of us in Park City know the the USPS does not deliver mail to homes in Old Town but I'm wondering if PEG knows that? Can PEG confirm where they are mailing all of these announcements to the neighbors? If they are mailing them to the physical addresses in Old Town they are probably getting most of them back mark 'Undeliverable'.