

Treasure Comments

From: Nicole Deforge <ndeforge@fabianvancott.com>
Sent: Friday, September 01, 2017 9:27 AM
To: Francisco Astorga; Treasure Comments
Subject: Treasure Hill Comments - August 2017
Attachments: THINC August 2017 planning commission letter.pdf

Dear Francisco,

Please include the attached letter with the public comments for the Treasure Hill conditional use permit application.

Thank you.

Nikki

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September 1, 2017

VIA E-MAIL (treasure.comments@parkcity.org)

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

**Re: Treasure Hill Conditional Use Permit Application –
August 9, 2017 Planning Commission Meeting**

Dear Members of the Park City Planning Commission:

In response to the Applicant's May 2017 draft traffic report, THINC previously submitted a report commissioned from Avenue Consultants, which identified numerous flaws in the methodologies, assumptions, and conclusions of that report. On August 9, 2017, THINC submitted an updated report from Avenue Consultants which evaluates the Applicant's final traffic report that was submitted the end of July. That report has already been added to the public comments for the Treasure Hill project.

Many of the same problems identified in the draft report are perpetuated in the final report, along with new and equally problematic issues as well. The updated report from Avenue Consultants addresses those flaws in detail, and only a few will be highlighted in this letter. But THINC strongly urges the Planning Commission and staff to very carefully review the updated Avenue Consultants report and then critically consider the conclusions and proposals set forth in the Applicant's most recent report.

First, possibly the most egregious flaw in the Applicant's report is that it still fails to address the impact of the Treasure Hill development on the capacity of the neighboring roads. The report continues to blindly focus on intersections while providing absolutely no information as to the current or projected street capacity. Given the documented capacity problems on these narrow roads already, the City cannot possibly evaluate the actual traffic impact of the development on those historic neighborhoods without detailed information from the Applicant about actual street capacity limitations.

Rather than providing this critical capacity information, the Applicant tacitly acknowledges capacity problems during the wintertime only without disclosing what the actual impact is. Instead, it leapfrogs over that issue and proposes a single fairly radical mitigation option, namely, it proposes to turn Lowell and Empire Avenues into one-way streets during wintertime. The problems with this are numerous and detailed in the report by Avenue Consultants.

For example, transforming Lowell and Empire into one-way streets would actually result in a substantial increase in traffic on these streets. Currently, the local residents and

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guests of places like the Lift Lodge head north straight down the hill without ever driving on the uphill portion of Lowell and Empire. If Lowell were to become a one-way street, all of this traffic would be forced to drive south along the entire length of Lowell and then loop around down the entire length of Empire just to leave the neighborhood. Drivers currently accessing the upper end of Lowell directly from Crescent Tram would be forced to drive all the way down Empire, turn left on Manor Way, and then drive all the way up Lowell to access their properties. The same would be true of anyone attempting to access Treasure Hill from the upper end of Old Town.

The same will also be true of all of the new traffic from the Bamberger and Resort developments. Rather than heading north downhill, all of that traffic will be funneled south up Lowell's narrow streets and then back down Empire. Yet, the past traffic studies for these projects that Applicant relies upon assumed that Lowell and Empire would be two-way streets, not one-way streets, and are therefore unhelpful in determining the actual traffic impact of these developments coupled with Treasure Hill. Because the Applicant's purported traffic mitigation solution would dramatically increase traffic on both Lowell and Empire, it is not a feasible mitigation option at all.

This is particularly concerning given that current traffic volume on Lowell and Empire is estimated by Avenue Consultants to be between up to 1,400 vehicles per day. The Treasure Hill development will double that number, adding about 2,600 daily vehicle trips for a total of up to 3,700 vehicle trips per day on each street. Yet, Avenue Consultants estimates that during winter driving conditions, roadway capacity on Lowell and Empire is only about 720-1,440 vehicles per day. If these roads were made into one-way streets during winter, then all of the Bamberger and Resort traffic would have to be factored in along with all of the traffic currently taking alternative routes that would instead be funneled to Lowell and Empire to determine actual volume vs capacity.

Transforming these roads into one-way streets only during winter would also create a logistical and safety nightmare. The Applicant does not explain how these seasonal changes would be communicated to drivers much less to the vehicle navigation services directing drivers over these roads. Switching back and forth between one-way and two-way access would lead to serious confusion by drivers with potentially catastrophic consequences. Yet the Applicant makes no suggestions as to how to mitigate this very real public safety impact.

Making these roads into one-way streets would also impose a serious inconvenience on residents and visitors alike and lower the quality of life in these neighborhoods. The one-way portions of each street would be nearly a mile long with a posted speed of only 20 mph. As noted in the Avenue Consultants report, this would create travel delays of over 2.5 minutes even under ideal conditions—with much longer delays during bad weather, snow removal, garbage days, deliveries, emergencies, and so forth. As the report states, "This would be a unique situation to have such a long pair of one-way roads without intermediate turn-around locations on such a low speed road." This is not a feasible mitigation option.

Even if the City were to create one-way streets on these roads, there would still be unacceptable flows at the Park Avenue/Deer Valley Drive intersection. That intersection would operate only at LOS E, which is not considered acceptable. Yet, the Applicant's report

acknowledges that any further improvements to the intersection to address that failure would be too impactful. So, the Treasure Hill development will increase PM peak hour delay beyond the 2037 background by at least 10% without any possible way to mitigate that impact.

Therefore, rather than safely mitigating the acknowledged impact of the development on traffic in these residential neighborhoods, the Applicant's radical solution of seasonal one-way streets would simply create new and different impacts and even increase the traffic on these streets. Yet again the Applicant merely shifts impacts in the guise of mitigation.

And, obviously, if the City does not adopt the one-way street option for any of these reasons, then the Applicant has failed to identify any feasible mitigation options for the significant traffic impact on these streets that Applicant acknowledges but never quantifies. There is no question that there is a serious, unmitigated impact to traffic, safety, and quality of life as a result of the development on the neighboring streets. A conditional use permit cannot issue under those circumstances.

Notably, the Applicant hasn't even acknowledged the fact that current construction on Lowell Avenue will significantly narrow what is already a treacherously narrow roadway. According to Planning Staff, the pre-construction asphalt width of Lowell Avenue varies between 25' at the intersection with Manor Way to 25.5' traveling south and that current construction will generally narrow the road cross section by 3'-3.5'. This is road that Applicant proposes to handle all construction traffic. That means that large construction tractors and trucks, which they conservatively estimate to be 300 per day, will be attempting to pass each other on a road cross section of just 22'-22.5' for years and years to come. It will be absolute gridlock on Lowell and an enormous threat to public safety and quality of life for residents, drivers, and pedestrians,

Second, Applicant's traffic report aptly demonstrates that the current iteration of the Treasure Hill development directly violates the conditions of the Master Plan approval. The Master Plan approval expressly mandated that the development not attract commercial traffic from offsite. But Applicant's own report establishes that the project will not only knowingly and intentionally draw offsite commercial traffic to the site, but draw it in droves. According to Table 6 of the Applicant's study, there would be 56 AM peak trips and 109 PM peak trips per hour in offsite commercial traffic. That represents 20-30% of the total traffic to the project. According to Table 7, after trip reductions, the commercial traffic represents 40-47% of the total traffic and exceeds the projected traffic to the hotel and all residential aspects of the project. According to Table 14, the offsite commercial traffic will generate a need for 178 weekday parking spaces and 184 weekend parking spaces. To the contrary, this represents 36-37% of the total parking needed for the project. Added to this is the fact that the cabriolet is designed to carry approximately 2500 passengers per hour to the development. There is simply no way that this much capacity is needed for on-site guests alone. This project is designed to draw and accommodate large numbers of offsite commercial traffic to the site—as the square footage numbers for commercial space alone plainly demonstrate. As various commissioners have pointed out repeatedly, there is no way that this enormous amount of commercial space can be sustained solely by onsite guests, particularly during the offseason. And clearly that is not Applicant's intention.

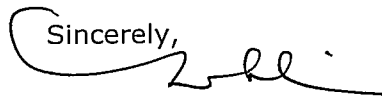
This is an egregious violation of the MPA that cannot be mitigated. If for any reason this development violates a condition of the MPA, then the Planning Commission doesn't even get to the CUP criteria or impact mitigation. As a threshold matter, the project must comply with each and every condition of the MPA. And it does not.

Third, as set forth in detail in the report by Avenues Consultants, there are numerous flaws in the methodologies, calculations, and assumptions in the Applicant's report. Those failings render the report unreliable and speculative. We refer you to that report for a detailed treatment of those issues.

In short, although the Potential Qualifying Standards proposed by the Planning Staff are a good start, they do not begin to fully address the enormous impacts of the Treasure Hill development on the traffic, safety, noise, emergency vehicle access, parking, pedestrian access, and quality of life in the surrounding historic neighborhoods. As noted in the reports, this is not just about mere engineering numbers—this is about quality of life for people living along and using local streets that were never intended or designed for this kind of traffic and use. Even if the Applicant were to fully comply with all of those proposed standards, the impacts of this enormous development on those issues would be substantial and unmitigated.

At the end of the day, the Applicant still far exceeds the scope of its Master Plan Approval and also fails to comply with the CUP criteria or mitigate impacts. The Treasure Hill CUP application must therefore be denied.

Thank you again for your consideration of THINC's concerns. We appreciate the opportunity to be heard.

Sincerely,


Nicole M. Deforge, Esq.