



Board of County Commissioners - Staff Report

Meeting Date:	November 19, 2024	Submitting Dept:	Planning & Building Services
Presenter:	Chandler Windom	Agent:	Stefan Fodor, Fodor Law Office
Property Owner:	Stage Stop, Inc.		
Subject:	MSC2024-0033: Transportation Demand Management Program for Workforce Apartments		

REQUESTED ACTION

A Miscellaneous Planning Request pursuant to Section 8.2.15 of the Teton County Land Development Regulations (LDRs) for the Transportation Demand Management (TDM) Plan associated with CUP2021-0005 for Workforce Apartments at the Legacy Lodge.

BACKGROUND/DESCRIPTION

PROJECT DESCRIPTION

This Transportation Demand Management program for Apartment Use located at 3000 W Big Trail Drive is a condition of the approved Conditional Use Permit, CUP2021-0005. In accordance with the Board of County Commissioners approval of CUP2021-0005 and the Findings of Fact and Conclusions of Law and Order dated November 15, 2022, the permit was approved with 15 conditions. Condition #5 states, *"Prior to issuance of this permit [CUP2021-0005] the applicant shall obtain Board of County Commissioners approval of a written Transportation Demand Management Plan (TDM Plan) presented in the form of a Miscellaneous Planning Request."* The Conditional Use Permit approval also requires Workforce Housing deed restrictions on all of the apartment uses and limits the total occupants to a maximum of 99 individuals.

EXISTING CONDITIONS

The site contains the Legacy Lodge, which was an operational assisted living center from the completion of construction in 2004 until its closure in early Spring of 2021. Since the closure of the center the ~50,000 sf building has been vacant, with the exception of the commercial kitchen, which has an issued use permit to be utilized as a bakery (BUP2023-0015). The facility contains 57 residential units, which vary from studios to 2-bedrooms.

LOCATION

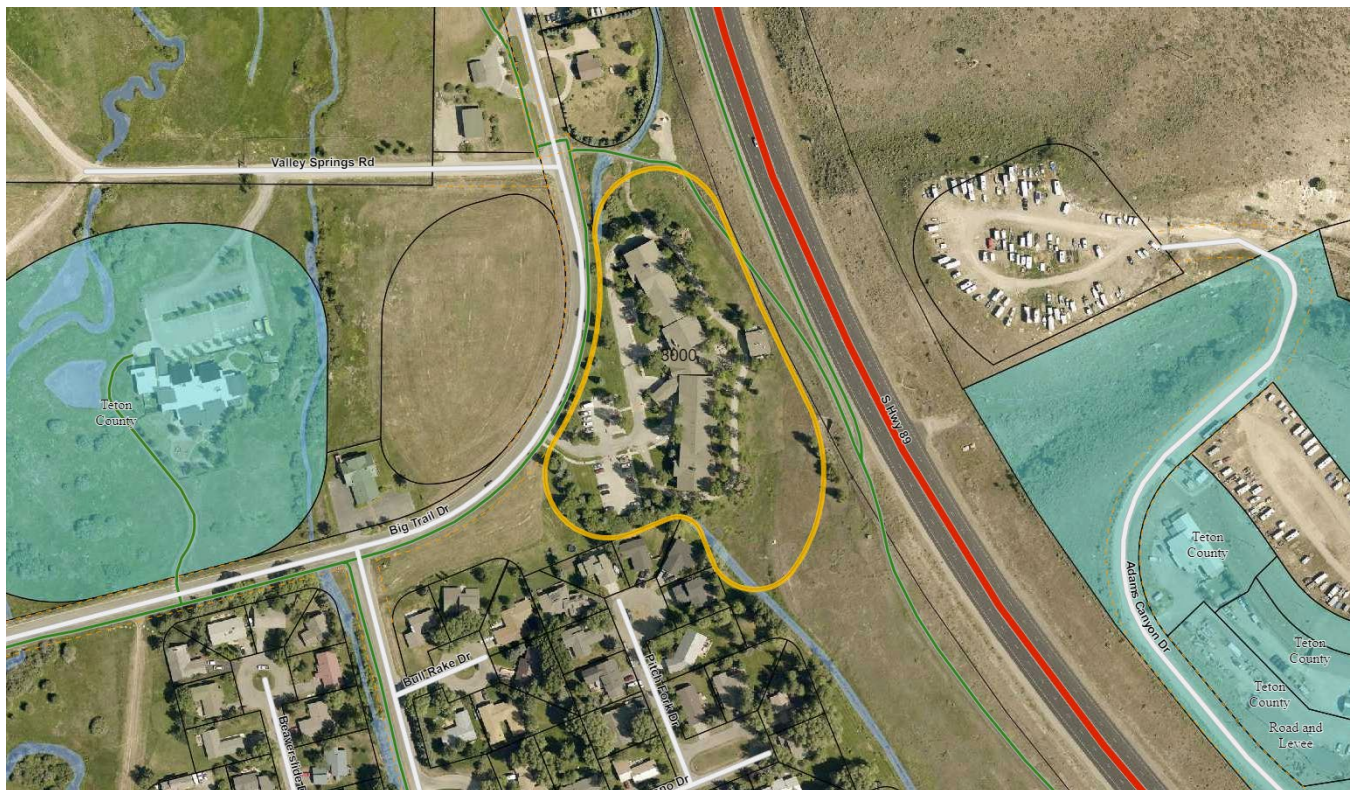
3000 W Big Trail Drive is situated in the northeast corner of the Rafter J Ranch.

Legal Description:	Lot 333 Rafter J Ranch	Subarea:	10.1: Southern South Park
PIDN:	22-40-16-17-2-03-001	Zone:	Planned Unit Development- Rural 3
Site Size:	5.37 acres	Overlay:	None
Character District:	10: South Park		

ZONING/VICINITY MAP



AERIAL MAP



SITE PLAN (GEC2023-0026)**STAFF ANALYSIS**

Throughout the review of CUP2021-0005 minimizing transportation impacts from the change of use was a significant topic of discussion. Methods for mitigating possible impacts were considered, including vehicle parking requirements/restrictions, bike parking, shuttles, bike shares, pathway improvements, START services, etc. Ultimately, in addition to the CUP2021-0005 conditions of approval related to parking and pathways, a condition to require a separate TDM application was included. Also relevant to this discussion is Condition #4, *“Annual monitoring reports shall be submitted by the owner to Teton County prior to January 31st of each year, which at minimum shall demonstrate compliance with the conditions of approval including the occupancy restriction and analysis of the Transportation Demand Management plan. These reports may be elevated to the Board of County Commissioners if deemed the monitoring report warrants a public review. If new issues of negative impacts arise or changing conditions cause unanticipated consequences associated with the use, the Board may impose additional mitigation measures and/or additional conditions may be required in association with the Conditional Use Permit.”*

According to LDR Section 1.8.2.C, in a Planned Unit Developments with PUD zoning *“The standards of the PUD shall apply except where the PUD is silent, in which case the standards of the underlying zoning shall apply.”* Under the standards of the original Rafter J PUD, this site is subject to the uses and standards of the Local Convenience Commercial (CL) District of the 1978 LDRs (see 11th printing). The approved Planned Unit Development Amendment (PUD2021-0001) included Apartments as a primary conditional use on this site with the following conditions;

1. Apartment Unit occupants shall be members of the Teton County Workforce. This occupancy restriction shall be enforced in a form that is acceptable to the Jackson/Teton County Affordable Housing Department
2. No more than One-hundred thirty-two (132) individuals may occupy all apartment units combined. [note this was further restricted to 99 individuals by the conditions of CUP2021-0005]

3. *Minimum parking requirements for the Apartments shall be 1 parking space per Apartment Unit.*
4. *Each unit shall include complete kitchen facilities as defined in LDR Division 9.5.*
5. *A Transportation Demand Management Plan shall be approved by the Board of County Commissioners with the Conditional Use Permit*

This TDM plan application, same as CUP2021-0005, is reviewed under the Rafter J PUD standards, which includes some aspects of the CL District of the 1978 LDRs, the PU2021-0001 approval, as well as the current LDRs. Important to keep in mind that LDR section 1.8.2.C which vests the validity of PUD zoning, also states that *“references to previous LDRs in a project’s approval shall be construed to reference the equivalent standard in these LDRs.”*

The current Land Development Regulations state that Transportation Demand Management (TDM) plans are required only in Resort Zones, including Teton Village, Grand Targhee, and Jackson Hole Golf & Tennis, and in the Northern South Park Overlay. There’s also a reference to Traffic Demand Management for certain types of Conditional Uses in the Rural-1 and Rural-2 zones. It’s typical for the resort master plans to dictate a separate process for managing and monitoring transportation impacts, so this application is being treated in a similar manner. Although there are no use-specific or zone-specific standards, the TDM application, similar to the resort zones, proposes to implement mitigation strategies in phases and relies upon monitoring to determine the effectiveness of the different strategies.

The requirement for the TDM was an important component of making the findings for approval of a Conditional Use Permit, specifically, *“minimizes adverse impacts on public facilities.”* The proposed TDM plan follows the guidance of draft regulations (not yet adopted in the LDRs) recommended by the Teton County Regional Transportation Administrator for transportation programs.

The application sufficiently summarizes the mitigation strategies, along with their desired/anticipated effects. There are clear triggers for success (or lack thereof) and when additional mitigation strategies are to be implemented, if necessary.

If the number of trips exceeds 46 trips in the AM peak hour or 53 trips in the PM peak hour, the owner shall implement additional mitigation measures as described in the “Phase II Mitigation Measures” below until the AM and PM peak hour trip count is back under these thresholds.

	Daily	AM	PM	AM in	AM out	PM In	PM Out
Phase II Trigger	-	46	53	30	16	24	29
Phase II Trigger Trips = (Senior Assisted Living Trips + 30) X 1.05							

The owner chose this threshold based in part on the TDM Draft Guidelines and recommendations therein. Specifically, the TDM Draft Guidelines note that 30 net, new trips may be a “threshold” for requiring a TDM and mitigation measures, and provided a 5% margin for major projects (defined in the TDM Draft Guidelines as projects requiring a full transportation impact study).

Monitoring reports will be submitted to Teton County prior to January 31st of each year and follow condition #4 of CUP2021-0005. Format for the required monitoring reports shall follow the recommendations of the Regional Transportation Administrator as described in Dr. Charlotte Frei’s comments.

RELATIONSHIP TO THE APPLICABLE LAND DEVELOPMENT REGULATIONS

Transportation Facility Standards (Div. 7.6)

Complies. LDR Section 7.6.4.I, in the Street and Road Standards, includes the following standards for a Traffic Impact Study;

Proposed subdivisions or other developments which will generate more than 1,000 vehicle trips per day shall conduct a traffic impact study to determine any need for additional acceleration, deceleration, traffic, or turning lanes, signalization, or other roadway improvements on roads affected by the development. The traffic impact study shall be reviewed by the Planning Director, the County Engineer, and the County Road & Levee Manager and will normally include current traffic counts, projected subdivision or development traffic generation, County traffic projections for roads affected by the subdivision or development, calculated capacity of existing and proposed roadways, calculation of intersection capacities and warrants for signalization, turn lanes, channelization, etc., estimates of bicycle and pedestrian movements, and other similar elements as required by the Planning Director.

A Traffic Impact Study was requested and provided as part of the CUP2021-0005 review, although the development was not anticipated to generate close to 1,000 vehicle trips per day. According to the Traffic Impact Study (TIS) provided for PUD2021-0001/CUP2021-0005 the proposed 57 apartments would typically generate 379 trips per day (average 6.65 trips/unit). There are no standards in the LDRs which stipulate required transportation mitigation at this scale, therefore Planning staff have relied heavily upon the recommendations and guidance of Dr. Charlotte Frei, Teton County Regional Transportation Administrator.

Parking Standards

Complies. PUD2021-0001 was approved with a condition which requires the parking for this Apartment building to be at minimum, 1 vehicle parking space per unit, plus 1 additional guest space per every 10 occupied units. Therefore, if all 57 apartments are occupied the total requirement would be 63 spaces, to meet the specifications of LDR Division 6.2. The issued grading permit, GEC2023-0026, will expand the on-site parking to 91 spaces. This would meet and exceed the minimum parking requirement for CUP2021-0005. As described in the TDM plan, one strategy to reduce traffic and the need for parking is to charge renters separately for parking from the rental rate of the unit. According to Dr. Charlotte Frei this is “an effective technique...thereby allowing renters to make decisions about housing and transportation that reflect the impacts of those choices on the property’s parking need.”

The applicant is also proposing additional bike parking as a component of their Parking and Transportation Demand Management Plan, which minimum requirements are derived from Condition #9 of CUP2021-0005, “Within six (6) months of permit issuance, the owner shall apply to the Rafter J Development Review Committee for approval to install a minimum of one (1) bicycle parking/storage space per Apartment Unit. The applicant shall install the required bicycle parking within one (1) year of the Rafter J Development Review Committee approval. If outdoor covered bicycle parking cannot be accommodated, an equivalent space for indoor bike storage shall be provided.” There is a paved area on site which can accommodate the required parking for 57 bicycles. While covered, outdoor bike parking is preferred, there is also indoor storage space available to renters for use during winter months or if they just prefer to store their bicycles indoors.

STAKEHOLDER ANALYSIS

DEPARTMENTAL REVIEWS

This application was sent to the following departments and agencies for review;

- Jackson/Teton County START Director, Bruce Abel (comments attached)

- Regional Transportation Planning Administrator, Dr. Charlotte Frei (comments attached)
- Jackson/Teton County Pathways Coordinator, Brian Schilling (no comments)

Additionally, it should be noted that [CUP2021-0005](#) was also sent to these departments and agencies, and those comments are still available for review.

- Teton County Road & Levee, Dave Gustafson
- Teton County Engineer, Amy Ramage
- Teton County Pathways Coordinator, Brian Schilling
- Wyoming Department of Transportation, Darin Kaufman

PUBLIC COMMENT

Notice of this hearing was mailed to property owners within 800 feet of the site on October 17, 2024. A notice was also posted on the site before November 9, 2024. As of the publishing of this report several comments have been received by staff which are attached to this report. In summary, there are concerns about the traffic at the intersection of Big Trail Drive and Highway 89. While not attached, staff would also like to remind the Board of the ample public comments received during the review of [CUP2021-0005](#) which spoke to traffic impacts.

LEGAL REVIEW

A. Moore

RECOMMENDATIONS

PLANNING DIRECTOR RECOMMENDATION

The Planning Director recommends **APPROVAL** of **MSC2024-0033** dated August 19, 2024, for the Transportation Demand Management Plan associated with CUP2021-0005, based on the findings recommended below.

PLANNING DIRECTOR RECOMMENDED FINDINGS

Pursuant to Section 8.2.15 of the Land Development Regulations, in order to issue a miscellaneous planning request, the Planning Director shall find that the circumstances in question:

1. *Is in substantial conformance with all relevant standards of these LDRs and other County Resolutions; and*
Can be made. As described in the above staff report, the Transportation Demand Management Plan demonstrates compliance with the LDRs. There are no other County Resolutions applicable to the application.
2. *Complies with all standards or conditions of any prior applicable permits or approvals.*
Can be made. The proposed Transportation Demand Management Plan complies with the standards and conditions of CUP2021-0005 and PUD2021-0001. The plan achieves the desired effect of minimizing impacts to public facilities as conditioned in the CUP2021-0005 permit approval.

ATTACHMENTS

- Plan Review Committee Comments
- Public Comment
- Applicant Response to PRC Comments
- MSC2024-0033 Application
- [CUP2021-0005 File \(digital only\)](#)

SUGGESTED MOTION

I move to **APPROVE MSC2024-0033** dated August 19, 2024, for the Transportation Demand Management Plan associated with CUP2021-0005, based on the findings recommended by the Planning Director.



OCTOBER 9, 2024

SUBJECT: MSC2024-0033 TRANSPORTATION DEMAND MANAGEMENT PLAN FOR LEGACY LODGE

Dear Ms. Windom,

Thank you for sharing the Travel Demand Management Plan for Legacy Lodge, part of MSC2024-0033. I offer the following comments for staff and Planning Commission consideration:

1. I defer to the Planning Department and County Attorney's office regarding the bakery trips should be included in the Tr. A bakery may generate significant trips during the AM peak hour, which tends to be busier than the PM peak due to constraints on work and school arrival times.
2. The 0.47 vehicle trip per dwelling unit cited is similar to a value based on 40 studies in the ITE Trip Generation Manual, ITE Code 220 for a "weekday, AM peak hour of generator", on page 257 of ITE Trip Generation Handbook – Volume 3, 11th Edition (September 2021).
 - a. Other ranges for trips generated per dwelling unit throughout the day or during the peak hour could be higher, so the annual monitoring process will be important.
 - b. The 3rd Edition of the ITE manual is out of date. New editions are published every 4-5 years; the 7th edition, for instance, was published in 2004. Engineers should obtain a copy of the manual from the last 10 years.
3. Total trips in the Rafter J Neighborhood (bottom of page 2 of 9, continuing to page 3 of 9); it is not clear if the numbers in this section represent actual trip counts or if these tables are based on calculations using 'professional judgment' per the note. I interpret that they were computed using a modified process than what is offered in an outdated version of the Trip Generation Handbook.
4. The annual monitoring report will be an important tool for monitoring whether the peak hour trip generation is indeed the values estimated in this plan. How the owner is utilizing fees collected to implement traffic mitigation should be included in future reports. The ongoing management and mitigation efforts – from pathway maintenance to parking passes sold – are important data to understand the efficacy of the TDM program.
5. TDM Strategies 1 & 3 were based on existing LDRs or clear CUP conditions, so I will not comment on these. On page 7 of 9, it is unclear if the 'paved area on site that will accommodate 57 bicycle parking spaces' will be a covered area, with a canopy. Users might use the inside bicycle parking spaces to protect their bicycles from excessive sun, rain, and wind. The condition states 'if outdoor covered bicycle parking cannot be accommodated, an equivalent space for indoor bike storage shall be provided'.
6. TDM Strategy #2 is an effective technique for separating the cost of housing and vehicle ownership, thereby allowing renters to make decisions about housing and transportation that reflect the impacts of those choices on the property's parking needs. I support this strategy and look forward to seeing the data on parking passes issued by unit type based on the sliding scale cost structure. The monitoring report could include a table that summarizes, at a minimum, the following:

Unit Type	Number of Units/Assigned Parking Spaces	Parking Passes Issued
Studio units	15/15	15 standard; 2 extra
1-bedroom units	25/25	24 standard, 1 extra
2-bedroom units	17/34	30 standard, 3 extra
Etc. as applicable	Etc. as applicable	

Tracking parking pass purchases and driveway counts in each monitoring report can indicate the effectiveness of existing (Phase I) and future Phase II TDM Strategies.

7. The Legacy Lodge housing calculation for Phase II triggers is appropriate, with 46 AM peak and 53 PM peak trips triggering additional Phase II TDM actions.
8. The Phase II alternatives are reasonable choices, and I look forward to working with the owners as the demand on the site materializes to determine whether these additional measures are needed.
9. I anticipate that when the first monitoring report is submitted, staff will have the opportunity to comment regarding the format and make suggestions for improvements. In general, the following format is typically well received:
 - a. Executive summary indicating whether the trips are under the anticipated Phase I and Phase II thresholds, what measures are in place (bullet list), and what measures the site is considering adding (bullet list).
 - b. Brief report describing data collection methods and TDM measures in place. This should be a more detailed write-up describing the TDM programs and procedures in place (e.g. parking attendants check the permits in the lot once per day, maintenance practices for bike parking area, etc.)
 - c. Appendices as appropriate, to include the original TIS (dated February 1, 2022), the TDM plan as presented (dated August 19, 2024), and cumulative driveway data counts for each collection to illustrate trends.

Finally, thank you to the Darwiche family and their technical and legal teams for this TDM plan. Many communities around the country, and indeed the world, have used TDM measures to better manage roadway capacity and public/community expenses needed to maintain safe and effective transportation infrastructure. I appreciate that the applicant worked with our new guidelines to develop a plan to monitor and manage the infrastructure impacts of this much-needed housing development. Only through implementing such strategies and measuring their impact can we gather the real-world data needed to manage our community transportation network.

Sincerely,



Charlotte Frei, PhD, PE



*Mission: We transport people.
START safely provides the greater Jackson Hole community with convenient transportation that is affordable, service oriented and environmentally friendly, improving the quality of life in the region.*

Memorandum

To: Chandler Windom , Senior Planner, Teton County Planning and Building

From: Bruce Abel, Transit Director

Date: October 11, 2024

RE: Legacy Lodge TDM Plan

I would ask that consideration be given to a requirement that Legacy Lodge purchase/fund season passes (\$125 per 6-month season or \$250 per year for each resident) for travel between Town and Teton Village for every resident of Legacy. This was discussed with Legacy Lodge developers back when the South Park Start-on-Demand pilot project was operating and has also been discussed since the early termination of the pilot project.

This is a common approach in TDM plans for new residential buildings. The thinking behind providing every resident a pass (not just those who ask for one) is to provide an incentive for folks to try transit. I would suggest that this approach of providing a free season pass to all residents would be a prudent component of a TDM plan. Such an approach might also provide an incentive to help to fund the reemergence of Start-on-Demand service in Rafter J and Melody Ranch. If Start-on-Demand does not operate, that same level of funding could be used to fund Legacy's operation of a shuttle service (or on-demand service) to/from Legacy.

If you have questions, please do not hesitate to contact me.

Copy: Charlotte Frei, Regional Transportation Planning Administrator

October 22, 2024

Dear Mr. Windom

I have received your letter of October 17 concerning the Transportation Demand Management plan for the "Legacy Lodge"

I would like to voice my opposition to this plan.

This plan in no way fully addresses the myriad of problems with the Legacy Lodge apartment proposal.

- This proposal will make the streets of Rafter J. (a wonderful quiet neighborhood) more dangerous with the large increase in traffic.
- It will make a dangerous situation of turning on to the highway even more dangerous with so many more cars in subdivision.
- Our children and pets will be at more risk to be hit by cars.
- The parking lot does not have near enough spaces for all the cars they would have parked there.....so that they would flow out onto our streets the same as has happened at south park apartments.
- And Since Legacy Lodge has already proven they do not need to honor our Rafter J rules.....why would they on these parking issues.....regardless of what they "say".

I could go on.....but please deny Legacy Lodge approval on this Transportation plan.

Sincerely,

A handwritten signature in cursive script that reads "Lucinda Krajsky".

Lucinda Krajsky
3190 Pitchfork
Rafter J
307-739-1042

From: [Kathie Brazinski](#)
To: [Chandler Windom](#)
Cc: [Tracy Baiotto](#); [Jessica Brown](#); [Brian Merritt](#); [Aida Farag](#)
Subject: Legacy Lodge TDM Plan Review Summary by Fehr and Peers"
Date: Tuesday, November 12, 2024 5:25:50 PM
Attachments: [LegacyLodge_TDMReview_ToRafterJ \(1\).pdf](#)

You don't often get email from kbrazinski@rafterj.org. [Learn why this is important](#)

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Dear Ms. Windom,

The attached is a review summary of the Legacy Lodge Transportation Demand Management Plan (TDM Plan) submitted by the Fodor Law Office in August 2024. The TDM plan is for the workforce housing element of the Legacy Lodge/Lot 333 of the Rafter J Ranch subdivision, Plat 330 (referred herein as "property"). This review was requested the Rafter J HOA Board of Directors and was performed by Fehr and Peers'. It examines the TDM Plan to assess compliance with County guidelines. **Bold and underlined** items are observations/corrections that should be addressed.

Sincerely,

Rafter J HOA Board of Directors

REVIEW OF THE AUGUST 2024 TDM PLAN:

In reviewing the TDM Plan prepared by Fodor Law Office, it was determined that the report was consistent with Teton County's draft TDM and TIS guidelines. The identified ~10% reduction in trips is in line with what the County has been considering as their base reduction requirement, and reductions used were well documented in a format consistent with the County's guidelines.

As follows are recommended refinements to anticipate the County's comments and to be more consistent with the previous TIS:

- **Trip Generation:**

- Typical industry standard would be to use the peak hour of the adjacent roadway (7-9a and 4-6p) as the basis for the trip generation of any new land use, unless that new land use will change the peak hour of the surrounding roadway network. The TDM Plan states that it used the peak of adjacent roadway, but the actual trip generation numbers given in the plan appear to be for peak of generator. **This should be corrected to peak of adjacent roadway numbers (see table below for a calculation of all potential options)**
- Although we understand the logic used to justify employing an average trip generation rate rather than the linear equation, **we would recommend shifting to the linear equation method in this case.** This provides a worst-case view of trip generation that will be more easily defensible to the County, while keeping the site below the 30-net-new-trip TDM threshold. Using this rate would remove any potential appearance of bias on the part of the HOA. Additionally, this is consistent with the methodological corrections we provided for the TIS in 2022; it will be important to have parity with that previous submittal's assumptions. See in **bold and underline** in the table the gross trip generation we would recommend using for the site.
- **We also recommend the peak of adjacent roadway method be use for the existing senior living use trip generation, for consistency.** This would result in existing trip generation being approximately 164 daily, 11 in the AM and 15 in the PM. When subtracting the existing AM and PM from the AM and PM site traffic, the resulting net new trips are 30 for both the AM and PM peak hours, which is the threshold the County is currently maintaining.

Calculation Assumption	Peak Hour Assumption	Daily Total	AM Peak			PM Peak		
			In	Out	Total	In	Out	Total
Average Rate	Adjacent Street (7-9a, 4-6p)	384	6	17	23	18	11	29
	Peak of Generator	384	6	21	27	20	12	32
Linear Equation	Adjacent Street (7-9a, 4-6p)	<u>441</u>	<u>10</u>	<u>31</u>	<u>41</u>	<u>28</u>	<u>17</u>	<u>45</u>
	Peak of Generator	441	12	36	48	37	22	59

- **Phase II Mitigation Measures Section:**

- The logic for the Phase II trigger is hard to follow. Considering the updated net-new trip generation will actually align with the 30-trip threshold the County has defined, it may be better to just express these peak hour thresholds as the gross trip generation for the new apartments (since, once the existing use is removed, the net-new trips are exactly 30 for both peak hours). **However you choose to present it, numbers should be consistent with the previous trip generation estimates to avoid potential questions from County Reviewers.**
- The County requirements also state that a monitoring plan must be in place to show how actual trips generated compare to the trip generation estimates. **We recommend that a simple monitoring plan be included at the beginning of the Phase II section.** The implementation of Phase II mitigation measures should be contingent on the findings of the monitoring plan (i.e., Phase II mitigations should only be considered once the site exceeds 30 net-new trips in any given peak hour). The monitoring should occur exclusively at driveway accesses to the new apartments, so as not to include trip generation from the other existing uses. Example monitoring plan text for this site that could replace the text in "Phase II Trigger" is given below:
 - *To confirm that the actual trip generation of the new apartments does not exceed the trip generation estimate contained in this plan, the owner shall institute an annual monitoring plan at the driveway accesses to the new apartments. This monitoring shall include annual driveway counts on a typical weekday during peak travel season to determine AM and PM Peak hour vehicle access into and out of the apartment site. Consistent with the TDM guidelines on minor projects (projects generating greater than or equal to 30 net new trips), this monitoring shall take place for 10 years following the construction of the apartments. During this period, should the counts indicate that trip generation is exceeding the estimate provided in this plan (see table) the owner shall implement additional mitigation measures as described in the "Phase II Mitigation Measures" below until the AM and PM peak hour trip counts is back at or under the a 30 net-new peak hour trip threshold.*

From: [Gina Lipp](#)
To: [Board Of County Commissioners](#); [Chandler Windom](#)
Cc: [steven lipp](#)
Subject: Deny approval of Stage Stop Transportation Demand Management Plan
Date: Monday, November 11, 2024 9:53:56 AM

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Teton County Commissioners and Chandler Windom,

As homeowners in Rafter J who uses almost daily the failing (graded F by WYDOT) and unsafe intersection of Big Trails/US 26/89, we respectfully request you DENY APPROVAL of Stage Stop's deficient transportation plan and insist that the concerns listed below are fully addressed in any future revision submitted by Stage Stop LLC.

This is a huge SAFETY concern for all who use this dangerous intersection daily.

1) This TDMP is dumping more traffic into a private subdivision that maintains their own roads onto an already unsafe failed F intersection. All strategies to reduce traffic impacts should be implemented immediately for the safety of all and not be allowed to be phased in.

May I also remind you that this building, which was originally intended, designed and built for Assisted Living, (considered Public Institution) for our elderly, seniors and residents with disabilities, consistently research has indicated that a significant majority of people living in assisted living facilities do not drive . Assisted Living typically provides their own private vans or small buses to transport their residents, which eliminates the traffic concern.

It should not be out of the question to request Stage Stop to provide their own transportation.

As a reminder, Rafter J is not considered a complete neighborhood, but zoned Rural. Apartments are also a violation of our CC&R's.

2) Ebikes and bikes are not a safe solution for traveling miles into town under icy and snowy pathway conditions 6 months out of the year. It's a fallacy to think this will happen.

Again, as a reminder, Rafter J is a rural subdivision, not a complete neighborhood.

3) The Bakery needs to be included in the generated traffic and not to be left out. Every type of traffic should be included in the equation.

4) The TDMP is very elusive in regards to parking. The lack of parking spaces is a

huge concern. Unlike the town, a complete neighborhood that allows for up to 72 hour parking on streets, parking is not allowed on any of our subdivision streets, not just on Big Trails Drive, but all streets in Rafter J, a rural subdivision. Our streets are not large enough to handle parking and will present yet another safety issue for drivers within Rafter J. Who will enforce no parking on Rafter J streets? Again, the safety enforcement burden will be on the private homeowners of Rafter J.

We also urge each and every one of you to come and turn left out of the failed and dangerous intersection during peak hours.

With so many riparian areas in our beautiful subdivision of Rafter J and deer and elk winter grounds just across the highway, please stop shoveling unsustainable growth and density on ecosystems and infrastructures not designed to handle them in the first place.

*Thank you,
Steve and Gina Lipp*

From: [JOHN LOTSHAW](#)
To: [Chandler Windom](#)
Subject: Fwd: Please deny approval of the TDMP for Legacy Lodge
Date: Sunday, November 10, 2024 2:53:58 PM

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From: JOHN LOTSHAW <jlotshaw@aol.com>
Date: November 10, 2024 at 2:48:53 PM MST
To: commissioners@tetoncountywy.gov
Subject: Please deny approval of the TDMP for Legacy Lodge

until their plan adequately addresses parking, traffic & road safety in Rafter J.
Dawn Lotshaw

Sent from my iPhone

From: [Mandy Lowe](#)
To: [Chandler Windom](#)
Subject: REJECT TRAFFIC STUDY - Lot 333 Usage (Formerly Legacy Lodge) Stage Stop LLC
Date: Friday, November 8, 2024 12:06:28 PM

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Teton County

Stage Stop LLC submitted a Transportation Demand Management Plan to the Teton County Planning Department in August 2024, as a required condition under the Conditional Use Permit (CUP) for redevelopment of Rafter J Lot 333 (the former Legacy Lodge). The developer hopes to get approval from the Teton County Commissioners at their November 19th meeting.

I ask you to REJECT this submission. It is entirely inappropriate to be reviewing this submission until all legal action against Stage Stop LLC., by Rafter J HOA board, has been concluded.

All efforts at this site should be in compliance with Rafter J CCRs and currently the purposes for which this traffic study is being submitted is for apartments - which are NOT PERMITTED BY THE CCRs.

Rafter J and all HOA communities deserve due process and for their governing documents to be abided. Stage Stop LLC should not proceed with any submissions until the Supreme Court has made their ruling.

Regards

Mandy Lowe

long time Rafter J resident

From: [Burns MacLeod](#)
To: [Chandler Windom](#); [Board Of County Commissioners](#)
Subject: TDMP Rafter J
Date: Thursday, November 7, 2024 4:38:27 PM

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The traffic in all areas of egress and ingress to Rafter J are, simply put, ...dangerous. They are dangerous to pedestrians, bikers and motor vehicles.. The sheer numbers of individuals trying to maneuver through these intersections, especially during high traffic times is dangerous. Increasing these numbers without major improvements for everyone's safety is idiotic..

please make smart decisions moving forward
"grow smart, grow slow"

--

Burns Macleod
Adams Canyon LLC

From: [Ed Krajsky](#)
To: [Chandler Windom](#)
Cc: [ed krajsky](#); [Wes Krajsky](#)
Subject: Opposition to Transportation Plan for Legacy Lodge
Date: Tuesday, October 22, 2024 7:47:03 PM

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To: Chandler Windom,

We received your letter of Oct. 17, 2024 concerning the Transportation Demand Management Plan for the " Legacy Lodge.

We are very opposed to this Transportation plan. First it does not fully address the dangerous situation of the merging from Rafter J on to the highway.

But more than that. The Legacy people bought a property in a Subdivision with CCRs that specifically excludes their apartment plan.

They have gone around our rules here in this subdivision in order to increase the value of their property.....But all the rest of us who live here (I have been in Rafter J 33 years) will have to pay for there increase in value.

- With more traffic, which will be more dangerous for the kids and pets living in Rafter J.
- more dangerous situation driving out of Rafter J
- more cars than their parking will handle,
- with our own property values being lowered
- more people in our quiet neighborhood

Regardless of what they are representing...their motivation is NOT to increase housing. It is to increase their wealth.

If their concern was work force housing ,they would just agree to a Below market value rent for each single unit....say \$800 per month. But they have not. They consistently say it will be at market rates.

They just want an increase in zoning....their property value increase...they can then sell and get out. Leaving the rest of us to deal with the problems they have created.

Please deny their Transportation plan.

Sincerely,

Ed Krajsky and Wes Krajsky
Jackson Hole Wyoming
307-690-2135 cell

From: [Jack Konitz](#)
To: [Chandler Windom](#)
Subject: Codie law office planning request for legacy lodge
Date: Wednesday, October 30, 2024 12:05:29 PM

[You don't often get email from jkonitz@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Chandler Wisdom, I own the Jacksonhole Veterinary Property on big trail drive and wish to comment on any variance request involving increased vehicle usage or parking request beyond what has already been allocated to the Legacy lodge! Traffic incr usage and any incr wear and tear to the rafter-j big trail drive if allowed should be compensated for to the homeowners association yearly! This is my concern and input! Thanks Jack Konitz
Sent from my iPhone



CONSULTANTS

ENGINEERING, SURVEYING & PLANNING
NATURAL RESOURCE SERVICES, GIS

November 12, 2024

Delivery via email

Teton County Planning and Building Services
PO Box 1727
200 S. Willow Street
Jackson, WY 83001

RE: MISC2024-0033
Traffic Demand Management Plan
Response to Comments

To whom it may concern,

In response to comments 2 & 3 provided by the County on October 9th, and included as an attached document for reference, the applicant would like to make a correction to the Transportation Demand Management (TDM) Plan submitted on August 19th, 2024. Comments have been referenced below for ease:

2. The 0.47 vehicle trip per dwelling unit cited is similar to a value based on 40 studies in the ITE Trip Generation Manual, ITE Code 220 for a "weekday, AM peak hour of generator", on page 257 of ITE Trip Generation Handbook – Volume 3, 11th Edition (September 2021).
 - a. Other ranges for trips generated per dwelling unit throughout the day or during the peak hour could be higher, so the annual monitoring process will be important.
 - b. The 3rd Edition of the ITE manual is out of date. New editions are published every 4-5 years; the 7th edition, for instance, was published in 2004. Engineers should obtain a copy of the manual from the last 10 years.
3. Total trips in the Rafter J Neighborhood (bottom of page 2 of 9, continuing to page 3 of 9); it is not clear if the numbers in this section represent actual trip counts or if these tables are based on calculations using 'professional judgment' per the note. I interpret that they were computed using a modified process than what is offered in an outdated version of the Trip Generation Handbook.

When producing the document, a citation was misincluded resulting in the potential interpretation that The Trip Generation Manual 11th edition was not used to generate volumes for identified land uses depicted in the plan. As noted on Page 1 of the TDM, all estimated trip generation volumes were created using the data and guidance provided by The Institute of Traffic Engineers (ITE) Trip Generation Manual 11th edition.

The table and citation in question was located on page 3 and is shown below:

RAFTER J COMMUNITY

Land Use	Total Generated Trips			Distribution of Generated Trips			
	Daily	AM Hour	PM Hour	AM In	AM Out	PM In	PM Out
Single Family House (495 DU, ITE Code 210)	4395	359	460	93	265	294	165
Medical / Dental Office (4,500 SF, ITE Code 720)	162	19	14	11	8	5	8
Day Care Center, CLC (12,000 SF, ITE Code 565)	571	141	142	75	66	67	75
Gateway Church (13,500, ITE 560)	103	9*	25	7*	6*	15	10

*The values are calculated based on professional judgment, differing from the process outlined in the "Trip Generation Handbook, 3rd Edition.

Figure 1. Reference from TDM plan submitted with application.

While the Trip Generation Handbook, 3rd edition was used and is attributed under the "Land use: 57 Apartments" section it was not applicable to this table. As further clarification, The Trip Generation Handbook is a supplemental document to the Trip Generation Manual to help inform judgment and the 3rd edition is the current edition.

Please reach out if you have additional questions or clarifications.

Sincerely,



Skyler Hoffrich, PE 17423
Engineering Manager
Skyler@y2consultants.com

FODOR LAW OFFICE, PC



August 19, 2024

Teton County Planning & Building Services
P.O. Box 1727
200 S. Willow Street
Jackson WY 83001
VIA electronic submittal to SmartGov Portal


Re: MSC Planning Request—Transportation Demand Management Plan for Legacy Lodge

Dear Director Neubecker:

Please find enclosed the proposed Transportation Demand Management Plan for Legacy Lodge/Lot 333 of Rafter J Ranch subdivision, Plat 330 ("Property"). This TDM is being submitted pursuant to Condition #5 of the CUP (CUP2021-0005) issued for the Property in 2022, which requires the owner to obtain Board of County Commissioners approval of a written Transportation Demand Management Plan (TDM Plan) presented in the form of a Miscellaneous Planning Request.

We have paid the submittal fee via the SmartGov portal. Please do not hesitate to contact our office if you have any questions regarding the submittal or need any additional information. Thank you.

Regards,



Fodor Law Office, PC
Stefan J. Fodor

Encl: Transportation Demand Management Plan

TRANSPORTATION DEMAND MANAGEMENT PLAN

Below is a proposed Transportation Demand Management Plan (“**TDM**”) for the workforce housing use at Legacy Lodge, which property is legally described as Lot 333 of Rafter J Ranch Subdivision, Teton County, Wyoming, according to that plat recorded in the Office of the Teton County Clerk on January 6, 1978 as Plat No. 330 (“**Property**”).

On November 1, 2022, the Teton County Board of County Commissioners approved CUP2021-0005 (“**CUP**”) for the Property, which included 15 conditions of approval. One of the conditions, Condition #5, requires the Board of County Commissioners to approve a written TDM prior to issuance of the CUP. The purpose of the TDM is to adequately mitigate anticipated traffic and transportation-related impacts of the proposed workforce apartment use with strategies that are consistent with the conditions approved with the CUP.

We understand that the County is currently working on guidelines for the preparation and review of Transportation Demand Management Plans. Given that no guidelines currently exist, we are preparing this TDM based on results from our Traffic Impact Study (TIS) that was submitted with our CUP in 2022, the conditions approved by the County on the CUP, and the draft mitigation strategies included in the Teton County Transportation Impact Study Guidelines, dated May 2024, prepared by Fehr & Peers and presented to the Board of County Commissioners at the June 3, 2024 BCC Workshop (“**TDM Draft Guidelines**”).

The owner anticipates opening the Property for workforce housing use in phases---wing by wing. Because the first “phase” of mitigation strategies is associated with conditions of approval on the CUP, these mitigation strategies will be implemented, starting with the opening of the first wing of the building for workforce housing. The CUP, and condition requiring a TDM, is tied to the workforce housing use on the Property. There is a bakery goods store use permitted and operating on the Property,¹ but because this BUP is outside the scope of the CUP we did not consider those trips. Phase II of the TDM includes additional mitigation strategies should the use of the Property hit the Phase II Mitigation Triggers (outlined below) in the AM or PM peak hours.

The Institute of Traffic Engineers (ITE) Trip Generation Manual, 11th Edition, is used to estimate the trip generation pattern based on different types of land use identified below, including the proposed use authorized under the CUP. Daily traffic generated, peak hour traffic for adjacent streets, and the directional distribution of AM and PM peaks associated with the land uses are identified below.

AM/PM Peak Hour Trips for 57 Apartments

- AM Hour Peak trips from 57 apartments: **27 trips**
- PM Hour Peak trips from 57 apartments: **32 trips**
- Net, new² AM Hour Peak Trips from 57 apartments: **13 trips**
- Net, new PM Hour Peak trips from 57 apartments: **11 trips**

¹ The bakery goods store use is authorized by BUP2023-0015.

² We are using “net, new” to mean the number of new trips generated from the proposed use above what was existing immediately prior to the proposed use. In this case, we looked at additional trips generated by the proposed apartment use as compared to the prior assisted living use.

Land Use: 57 Apartments

The ITE Land Use 220 for 57 apartments was used to determine the trip rates. The trip generation was based on dwelling units because of larger data sample size as compared to trips based on number of residents. The commercial kitchen on the first floor of the Property was not considered as a separate use under this alternative. With 57 apartment units, the estimated trips that the site will generate are as follows:

Alt-I, Land Use	Total Generated Trips			Distribution of Generated Trips			
	Daily	AM Hour	PM Hour	AM In	AM Out	PM In	PM Out
Apartment (57 Dwelling Units, ITE Code 220)	384	27	32	6	20	20	12

Total generated trips for Apartment land use code were determined using Average Rate model rather than Fitted Curve for Weekday, AM Peak Hour and PM Peak Hour trips in following the standard process defined by chapter 4 of ITE Trip Generation Handbook – 3rd edition. When following the process defined in 4.4 it was determined that given the study size being reviewed and the sample data points available from ITE, the Fitted Curve Equation was not a representative fit for use in forecasting site trip generation. Hence, the difference between the numbers above and those prepared by the County and presented to the Board of County Commissioners on June 3, 2024.

Prior Land Use: Assisted Living Facility

PREVIOUS LAND USE

Previous Land Use	Total Generated Trips			Distribution of Generated Trips			
	Daily	AM Hour	PM Hour	AM In	AM Out	PM In	PM Out
Senior Assisted Living (63 Beds, ITE Code 254)	164	14	21	9	5	9	11

Total Trips in the Rafter J Neighborhood

We have also reviewed the overall percentage of trips generated from this proposed workforce housing use in relation to the overall mix and scope of uses existing as of today within the Rafter J neighborhood. The proposed housing is anticipated to represent approximately 4.8% of the overall Rafter J neighborhood AM and PM peak hour trips. The prior assisted living use represented approximately 2.6% of AM peak hour trips and 3.1% of PM peak hour trips of the overall Rafter J community----so, an approximate 2.2% increase in AM peak hour trips and 1.7% increase in PM peak hour trips as compared to the assisted living facility.

RAFTER J COMMUNITY

Land Use	Total Generated Trips			Distribution of Generated Trips			
	Daily	AM Hour	PM Hour	AM In	AM Out	PM In	PM Out
Single Family House (495 DU, ITE Code 210)	4395	359	460	93	265	294	165
Medical / Dental Office (4,500 SF, ITE Code 720)	162	19	14	11	8	5	8
Day Care Center, CLC (12,000 SF, ITE Code 565)	571	141	142	75	66	67	75
Gateway Church (13,500, ITE 560)	103	9*	25	7*	6*	15	10

*The values are calculated based on professional judgment, differing from the process outlined in the "Trip Generation Handbook, 3rd Edition.

Land Use	Total Generated Trips			Distribution of Generated Trips			
	Daily	AM Hour	PM Hour	AM In	AM Out	PM In	PM Out
Rafter J With Senior Assisted Living	5395	541	661	195	350	390	270
Senior Assisted Living	164	14	21	9	5	9	11
	3.0%	2.6%	3.1%	4.7%	1.3%	2.4%	4.2%
Rafter J With Apartment	5615	554	672	193	366	401	271
Apartment	384	27	32	6	20	20	12
	6.8%	4.8%	4.8%	3.3%	5.6%	5.0%	4.6%

TDM Strategies to Reduce Vehicle Miles Traveled by Single Occupancy Vehicles

Below, the owner has outlined its proposed TDM strategies based on various thresholds of use. The initial set of strategies, designated as "Phase I" strategies, will be implemented with the opening of the first wing of the building and continue through full use of the building (i.e. all 4 wings). The owner will perform an AM Peak Hour and PM Peak Hour trip generation count at its Property driveway annually to determine whether the additional strategies in Phase II, as outlined below, need to be utilized. These AM Peak Hour and PM Peak Hour counts will be provided to the County in the owner's annual monitoring report.

Phase I Mitigation Measures

1. Pathway Improvements

The approved CUP condition states:

Within six (6) months of permit issuance, the owner of Lot 333 shall apply to the Rafter J HOA for approval of the pathway crossing improvements in a manner that is acceptable to the Teton County Pathways Coordinator. The owner of Lot 333 shall complete the pathway crossing improvements within one (1) year if the landowner (Rafter J Ranch Homeowners Association) approval is granted.

The subject pathway crossing is located on Rafter J HOA-owned property. The pathway crossing is circled in RED below. The condition anticipates that the owner may not be able to gain HOA approval for off-site upgrades here.



The applicant received comments during the CUP review process from the Teton County Pathways Coordinator regarding this pathway and recommended improvements. Given that this is an off-site improvement for the Owner, it will need to be approved by the Rafter J HOA (as noted in the CUP condition). If the HOA does not approve the pathway crossing on their property, the owner will nevertheless ensure that the current pathway connecting the building to the pathway along Big Trail Drive remains is maintained in a safe, paved, and open manner to encourage the connection to the greater pathway network.

There is an additional connection to the pathway on the north side of the Property. This connection is highlighted below. The owner is proposing to expand onsite parking within this northern area of the Property and such expansion will impact the route to this existing pathway connection through the Property. This parking expansion was approved pursuant to GEC2023-0026, with a condition similar to the condition above regarding improving the pathway connection and crossing at the entrance to the Property (i.e. on HOA property). Given the changes in grade between the pathway and parking area, a

connection to the pathway may not be feasible here. Therefore, the owner's efforts will be focused on the connection at the front of the building.



Summary of TDM Strategy #1: Within six (6) months of permit issuance, the owner of Lot 333 shall apply to the Rafter J HOA for approval of the pathway crossing improvements in a manner that is acceptable to the Teton County Pathways Coordinator. The owner of Lot 333 shall complete the pathway crossing improvements within one (1) year if the landowner (Rafter J Ranch Homeowners Association) approval is granted. If approval is not granted, the owner shall continue to maintain a well-marked, paved and open pathway for non-motorized vehicles from the building to the front edge of its property where it abuts Big Trail Drive. While this pathway already exists, the benefit of including this condition in the TDM is that the owner is required to keep the pathway connection and maintain the same in usable condition for pedestrians and cyclists.

The purpose of this internal circulation is to encourage residents within the Legacy building to utilize the greater pathway system and, if biking, to safely and efficiently connect to the greater pathway system and commute to Town and/or bus stops closer to Town.

TDM Strategy #1/Relationship to the TDM Draft Guidelines and associated reductions in VMT: Improving safety and connectivity to greater pathway network (off-site improvement, if permitted) and improving the pedestrian and bicycle experience within the Property. The excerpt below is from the TDM Draft Guidelines, and includes the proposed mitigation measure and anticipated reduction in *vehicle miles traveled (VMT)*. A summary of these reductions, and conversion from VMT to trip generation, is provided at the end of this section.

4	Bike & Ped	Improve pedestrian spaces both within the project and on roadways approaching the project. Improvements may include providing sidewalks on both sides of the street, incorporating ADA-compliant improvements such as tactile ramps and audible pedestrian signals, providing sidewalk amenities such as trees, plants, and benches, and otherwise improving the pedestrian experience.	New development in areas where pedestrian facilities are missing or lacking	T-17	0.5% to 6.4%
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2. Additional Parking & Parking Enforcement

The approved CUP conditions state:

Prior to occupancy of any individual apartment unit, the owner shall install the additional required vehicle parking equal to a minimum of one parking space per unit occupied and 1 additional guest space per 10 occupied units.

The applicant shall provide an on-site 24-hour property manager whose responsibilities include parking enforcement. It is the responsibility of the landowner, and by proxy the property manager, to inform, monitor and enforce parking restrictions that prohibit any resident, visitor or employee of the site from parking on any Rafter J roads or rights-of-way or anywhere on site that is not in a designated paved and lined parking space.

The Owner has restriped the current parking area so that there are currently 41 parking spaces on the Property. The Owner is in the process of adding 62 parking spaces as approved in GEC2023-0026. This is to accommodate the required minimum 1 unit/1 parking space requirement in the CUP, guest parking, and additional parking as there were concerns voiced during the CUP process that 1 space/unit was not going to be enough and residents would be parking on Big Trail Drive. The owner is responding to (and has responded to in the case of restriping existing spaces) that concern by accommodating more parking on site.

The property manager will have a presence on site 24 hours a day and will be responsible for parking enforcement as noted in the approved CUP condition. Parking spaces on the Property for residents will be clearly marked, and it will be made clear to residents prior to leasing a unit that they are not to park vehicles on any Rafter J roads or rights of way. This specific provision will be included in the Rules and Regulations provided to all tenants, and in the tenant leases.

Moreover, in order to encourage carpooling, the owner will charge for parking separately from the rental rate for the unit. The parking fee will be coordinated with the property management company to be a number that is reasonable given that this is workforce housing, but high enough to potentially discourage all residents from having a vehicle. More specifically, each studio unit and 1-bedroom unit will be able to utilize 1 parking spot on the property for a lower monthly fee, which fee will be determined at the time of parking pass issuance. If a studio or 1-bedroom tenant wants additional parking spaces on the Property, the tenant will pay a more significant fee for any additional parking beyond the first space. Again, this fee will be determined at the time of issuance in coordination with the property management company. The purpose of this higher fee for an additional vehicle/parking space on the Property is to discourage tenants from having a second or third vehicle and to encourage carpooling. 2-bedroom units will be permitted 2 parking spaces for a lower monthly fee, which fee will be determined at the time of parking pass issuance. If a 2-bedroom tenant wants additional parking spaces, the tenant will pay a more significant parking fee for any additional parking spaces on site.

The owner plans to utilize a portion of the fees collected from parking passes to implement and maintain its traffic mitigation measures on site.

Summary of TDM Strategy #2: Parking is being expanded on site so that the owner is able to satisfy minimum parking requirements in the CUP, and additional spaces to mitigate concerns that residents will park offsite and on Rafter J roads if adequate parking is not provided onsite.

Parking will be strictly regulated and enforced by the onsite property management company. Lessees will have a parking pass and designated spot(s), and will be provided a copy of the rules and regulations for the building which will include, among other things, a copy of the HOA's rules and regulations prohibiting parking on Big Trail Drive. The leases will also include provisions that 1) dictate the number of permitted vehicles per occupant and 2) make parking on the roads within Rafter J a default under the lease. These provisions are standard in leases, and will be in all leases for the building.

Moreover, the owner will be charging for resident parking passes per vehicle as a way to discourage single-occupancy vehicles and encourage carpooling or utilizing other forms of transportation.

TDM Strategy #2/Relationship to the TDM Draft Guidelines and associated reductions in VMT: Parking will be managed by a professional property management company, and will include a sliding scale of paid parking options meant to deter residents from having multiple vehicles. The excerpt below is from the TDM Draft Guidelines, and includes the proposed mitigation measure and anticipated reduction in *vehicle miles traveled (VMT)*. A summary of these reductions, and conversion from VMT to trip generation, is provided at the end of this section.

10	Parking	For residential developments, require that parking spaces be paid for separately from the primary mortgage/HOA dues/rent. This effectively reduces housing costs for households with no cars / fewer cars	Residential development	T-15	2.6 - 15.7%
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3. **Bicycle Parking/Storage Spaces**

The approved CUP condition states:

Within six (6) months of permit issuance, the owner shall apply to the Rafter J Development Review Committee for approval to install a minimum of one (1) bicycle parking/storage space per Apartment Unit. The applicant shall install the required bicycle parking within one (1) year of the Rafter J Development Review Committee approval. If outdoor covered bicycle parking cannot be accommodated, an equivalent space for indoor bike storage shall be provided.

The Owner has nothing to add to this existing TDM strategy included in the CUP conditions. This condition clearly defines Owner's obligations with regard to bicycle parking, and the Pathways Coordinator has already provided comments on recommend bicycle parking pads, design, etc. The County has approved a paved area on site that will accommodate 57 bicycle parking spaces. See GEC2023-0026. During the winter season, inside bicycle parking spaces will be accommodated in designated areas of the building.

Summary of TDM Strategy #3: Within six (6) months of permit issuance, the owner shall apply to the Rafter J Development Review Committee for approval to install a minimum of one (1) bicycle parking/storage space per Apartment Unit. The applicant shall install the required bicycle parking within one (1) year of the Rafter J Development Review Committee approval. If outdoor covered bicycle parking cannot be accommodated, an equivalent space for indoor bike storage shall be provided.

TDM Strategy #3/Relationship to the TDM Draft Guidelines and associated reductions in VMT. The owner is providing ample bike parking and storage on site. The excerpt below is from the TDM Draft Guidelines, and includes the proposed mitigation measure and anticipated reduction in *vehicle miles traveled (VMT)*. A summary of these reductions, and conversion from VMT to trip generation, is provided at the end of this section.

3	Bike & Ped	Provide secure bicycle parking in either a dedicated room, via bicycle lockers, or a bike station incorporated into the project.	Residential and office land uses, where bicyclists will be expected to park their bicycles for 6+ hours per day.	T-9	0.1% - 1.6%
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Phase I Mitigation Summary

Based on the 3 proposed Phase I mitigation strategies outlined above, we expect a reduction in 3 trips in the AM peak period and 3 trips in the PM peak period using an anticipated average reduction in VMT of 10.45%, as defined by the TDM Draft Guidelines. If we were to look at net, new trips generated by the workforce units, the anticipated net, new trips (with mitigation measures accounted for) is **10 trips** in the AM peak hour and **8 trips** in the PM peak hour.

The percentage reductions below in VMT are from the TDM Draft Guidelines.

Pathway crossing improvements –0.2 – 0.8%, 0.5% reduction in VMT

Bicycle Storage – 0.1 – 1.6%, 0.8% reduction in VMT

Controlled / Paid Parking Spaces - 2.6-15.7%, 9.15% reduction in VMT

Total Reduction provided by Phase I Mitigation efforts should provide on average a reduction of 10.45% in VMT produced by users of the site. Assuming VMT can be directly correlated to trip generation, the estimated reduction has been reflected in the table below:

Alt-I, Land Use	Total Generated Trips			Distribution of Generated Trips			
	Daily	AM Hour	PM Hour	AM In	AM Out	PM In	PM Out
Apartment (57 Dwelling Units, ITE Code 220)	384	27	32	6	20	20	12
Reduction	40	3	3	1	2	2	1
Anticipated Trips	344	24	29	5	18	18	11

Phase II Mitigation Measures

Phase II Trigger

If the number of trips exceeds **46** trips in the AM peak hour or **53** trips in the PM peak hour, the owner shall implement additional mitigation measures as described in the “Phase II Mitigation Measures” below until the AM and PM peak hour trip count is back under these thresholds.

	Daily	AM	PM	AM in	AM out	PM In	PM Out
Phase II Trigger	-	46	53	30	16	24	29
Phase II Trigger Trips = (Senior Assisted Living Trips + 30) X 1.05							

The owner chose this threshold based in part on the TDM Draft Guidelines and recommendations therein. Specifically, the TDM Draft Guidelines note that 30 net, new trips may be a “threshold” for requiring a TDM and mitigation measures, and provided a 5% margin for major projects (defined in the TDM Draft Guidelines as projects requiring a full transportation impact study).

Phase II Mitigation Measures

The owner will start by picking one alternative and, if that alternative does not reduce the number of trips on site to a number below the Phase II trigger (as shown in an annual monitoring report), the owner must choose the second alternative in the next year to further reduce trips.

Phase II Alternative I: The owner will provide a shuttle to residents onsite during the AM and PM peak hour periods that runs from the Property to a designated drop off location near the Highway 89/Highway 22 intersection (“Y intersection) or ii) if, at the time the Phase II Mitigation Measures are triggered, START is providing transit services to the Rafter J neighborhood during AM and PM peak hours, the owner will provide subsidized transit passes for residents who wish to utilize the transit service. If this latter option is utilized, it will be documented in an agreement between the owner and tenant.

Phase II Alternative II: The owner will launch a formal car-sharing program and a formal e-bike sharing program for residents of the Property. If the docking station for the e-bikes must be located outside the building (for safety reasons) and requires HOA approval, that alternative is subject to approval of the docking station structure by the HOA. If the HOA does not approve the docking structure, the owner will move forward with only the car-sharing program.

The owner is proposing both programs as residents may be less inclined to commute via bike during colder months. The car-sharing program will allow residents to short-term rent cars. The details of the program will be developed based on demand at the time this is implemented. If implemented, details of the program will be provided to the County in the annual monitoring report. The e-bike program is fairly self-explanatory, but would involve a docking station where e-bikes would be made available to residents for short-term rental on either a reservation or first-come, first-served basis. Again, if implemented, the specifics of this program would be reported to the County in the owner’s annual monitoring report.