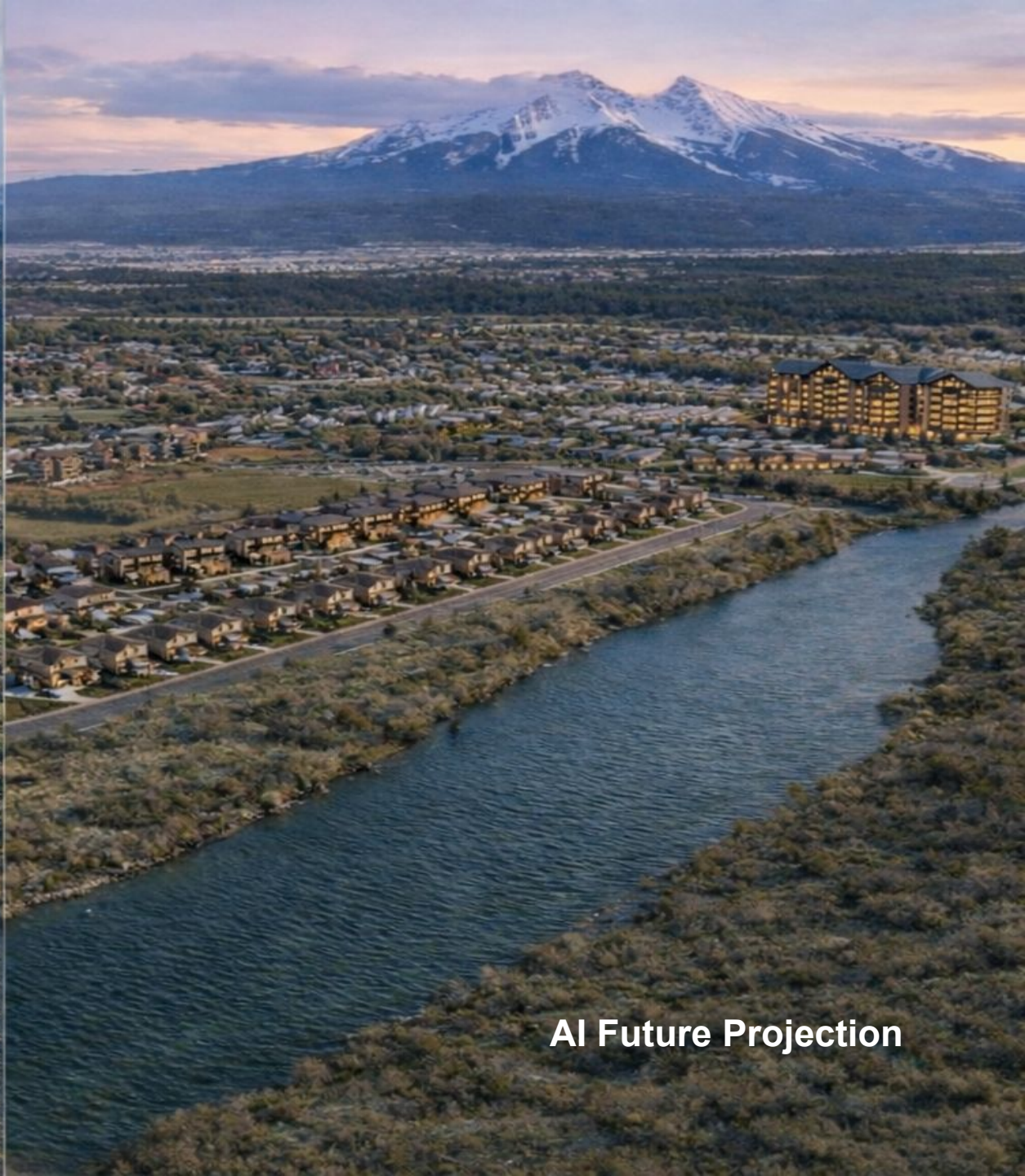






Current Conditions



AI Future Projection



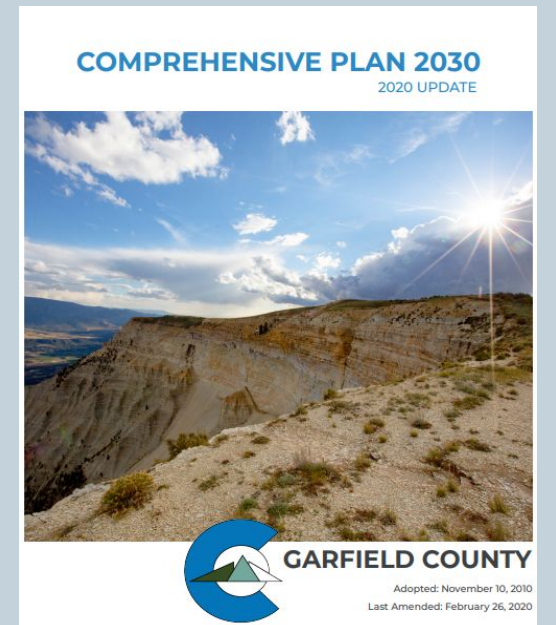
Code Compliance



Key Land Use & Development Code Issues

Review & Compliance - “Shalls” and “Mays”

- If the **application fails to satisfy any ONE of the code requirements** and compliance cannot be achieved through conditions of approval, **the recommending body shall recommend the application be denied (LUDC 4-101.F-2)**
- **Developer’s Application fails to meet at least 22 LUDC requirements/standards and ALL basic requirements under Section 6-202.C.**

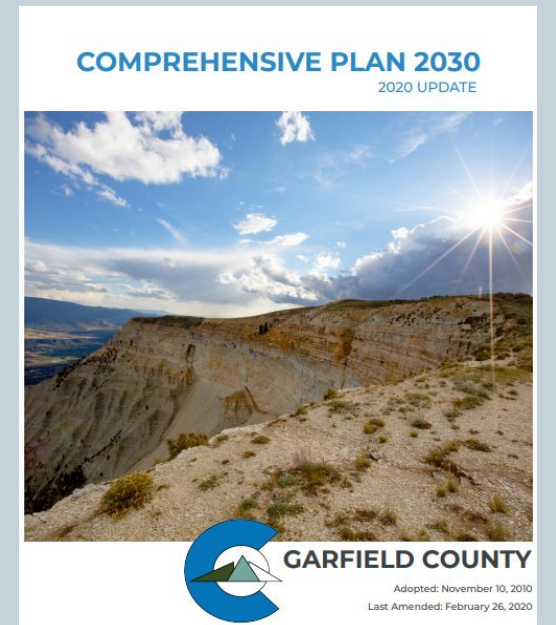


7 Requirements For Approval

- LUDC Section 6-101.A.: “PUDs **must** be in general conformance with the Comprehensive Plan.”
- LUDC Section 6-202. B.1.c.: “The approved PUD zoning and the approved PUD Plan are inseparable. PUD zoning **shall not** be approved without the approval of the related PUD Plan documents.”
- LUDC Section 6-2-202.C.: “An application for PUD Zoning **shall** meet the following criteria:
 1. Purpose and Applicability. The PUD meets the purpose and applicability of this Code, as provided in section 6-101.A. and B.
 2. Development Standards. The PUD meets the Development Standards as provided in section 6-401.
 3. Standards, Article 7. The PUD meets the standards within Article 7, excluding 7-101.
 4. Rezoning Criteria. The PUD meets the Rezoning Review Criteria in section 4-113.C.
 5. Established Zoning Standards. The PUD Plan adequately establishes uses and standards governing the development, density, and intensity of land use by means of dimensional or other standards.

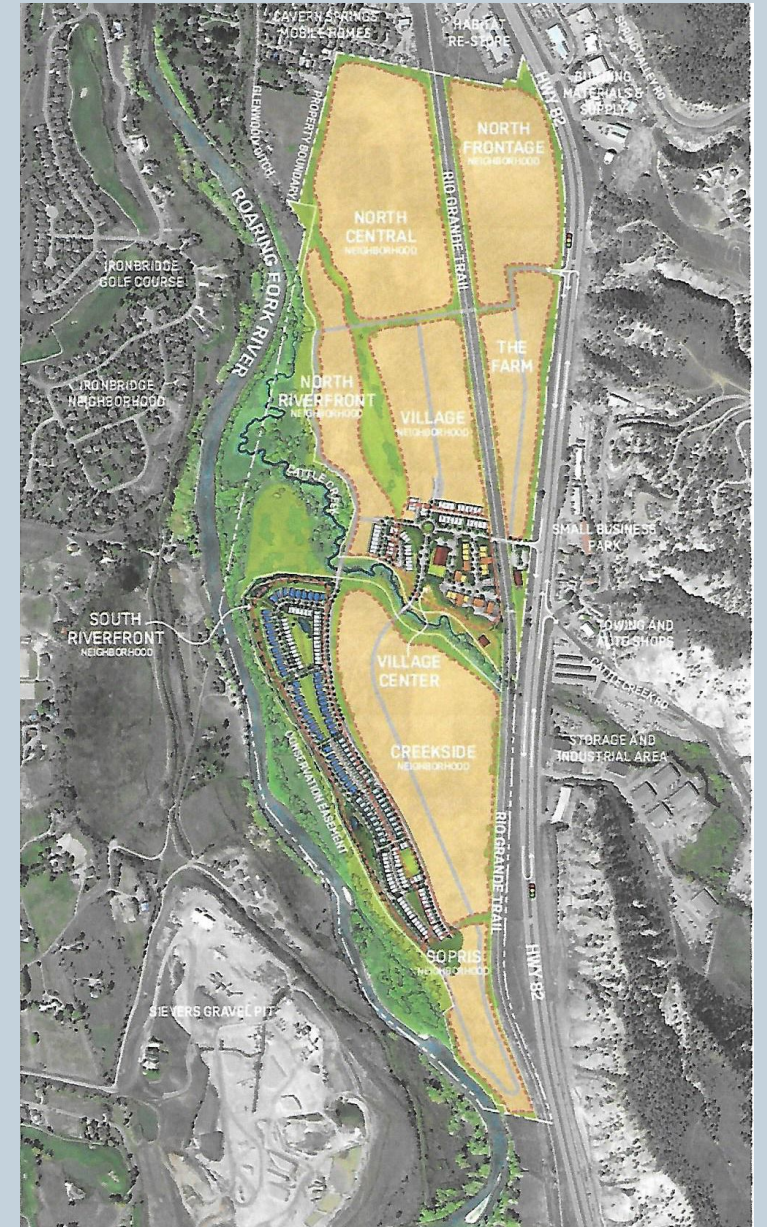
PUD Application is not in conformance with Comprehensive Plan or LUDC (Art. 4, 6, 7 and 8)

- **Does not conform to Comprehensive Plan**
- **Does not meet Phasing Plan requirements**
- **Does not meet PUD Map/Site Plan requirements**
- **Does not meet Development Agreement/SIA requirements**
- **Does not meet PUD Landscaping Plan requirements**
- **Does not meet Grading and Drainage plan requirements**
- **Does not meet Affordable Housing Article 8 requirements**
- **Does not meet PUD Design Standards for roads, lots, parking, etc.**
- **Does not conform with adjacent land uses and densities**
- **Does not satisfy rezoning review criteria**
- **Does not mitigate impacts on traffic, wildlife, water, and views**
- **Does not mitigate RFTA transit impacts and fiscal impacts**



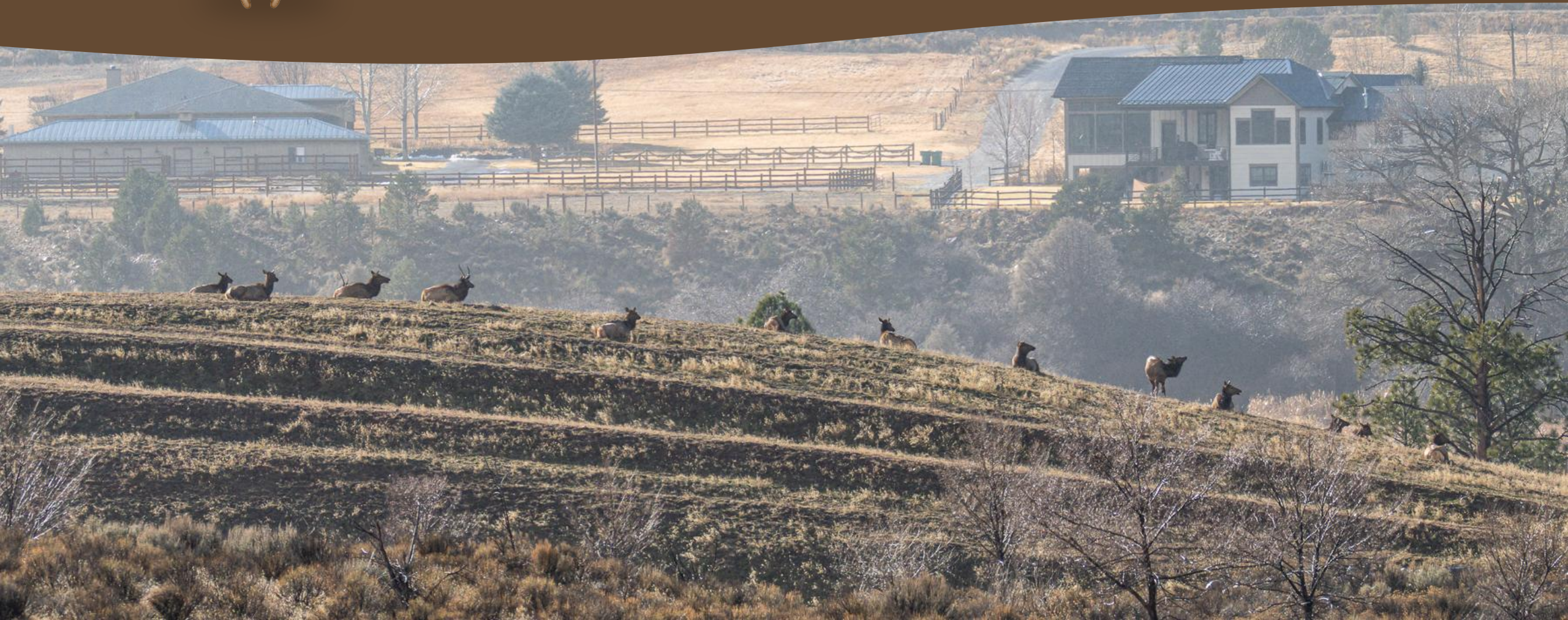
Form Based Zoning not Recognized in LUDC

- HRF PUD relies on form based zoning which is NOT a recognized or adopted type of zoning under the LUDC or Comprehensive Plan
- HRF Plan would override PUD amendment procedures and deprive Planning Department of appropriate review and decision making authority
- HRF Plan would override LUDC conflict provisions





Preserving Rural Character

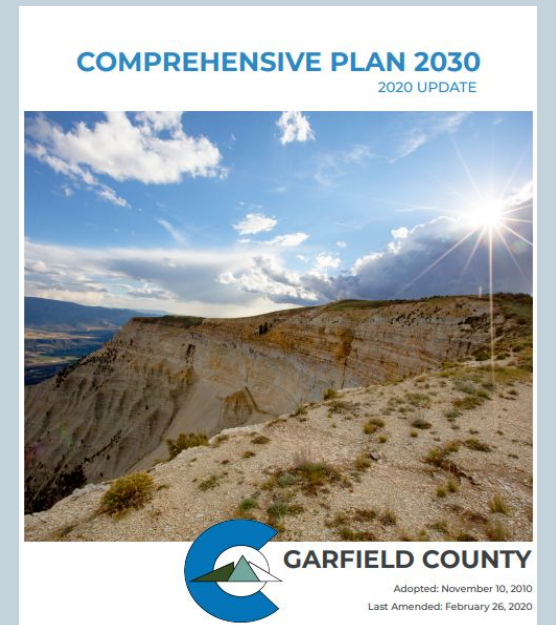


Key Land Use & Development Code Issues

The Residential Suburban Zone District is comprised of **low-density** suburban residential uses **developed to maintain a rural character.**

Community Character & Growth

- New developments **must match the nature**, scale, and intensity of **surrounding areas** (7-103)
- HRF is **high density Urban Scale** not Rural Residential
- 120 Room Hotel and 55,000sf commercial are not compatible with surrounding uses and properties (7-301)
- Traffic Impacts and Public Wildfire Hazards are **increased** not Mitigated (7-107, 7-206)
- Wildlife, Wildlife Habitat, and Water Quality are adversely impacted (7-202 and 203)



Harvest Roaring Fork

Too Dense, Too Urban, Wrong Place, Out of Character



- 1,500 housing units + 375 ADU's
- 55,000 sq. ft commercial space
- 120-room hotel on 283 acres
- 8.7 units per acre average
- Density as High as 15 units per acre

Surrounding neighborhoods have far lower density:

Ironbridge: 322 units on 533 acres, plus a 223 acre golf course = **1 unit per 1.7 acres**

Aspen Glen: 429 units on 965 acres (including the golf course) = **1 unit per 2.25 acres**

Teller Springs: 21 houses + 11 ADU's on 160 acres = **1 unit per 5 acres**

West Bank Ranch: 100 units on 142 acres = **1 unit per 1.42 acres**

West Bank Mesa: 63 units on 281 acres = **1 unit per 4.46 acres**



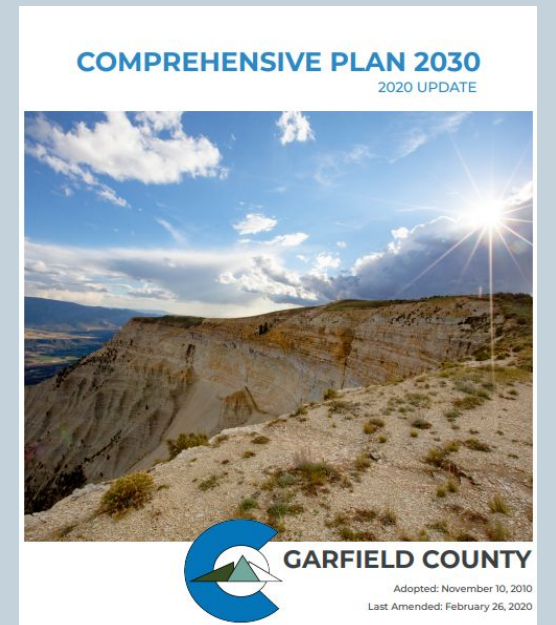
Traffic, Roads, and Infrastructure



Key Land Use & Development Code Issues

Traffic & Infrastructure

- Roads must ensure **safe and adequate access** (7-107)
- Development density should match public service capacity
- Projects must **not create traffic congestion or unsafe conditions** on County, State, or Federal roads
- Projects should **not have unreasonable traffic impacts on local roads**



Construction Traffic Not Considered, Addressed Or Disclosed

LUDC 4-203 (L2 c, d & e):

*Basic traffic analysis **Shall** include the following:*

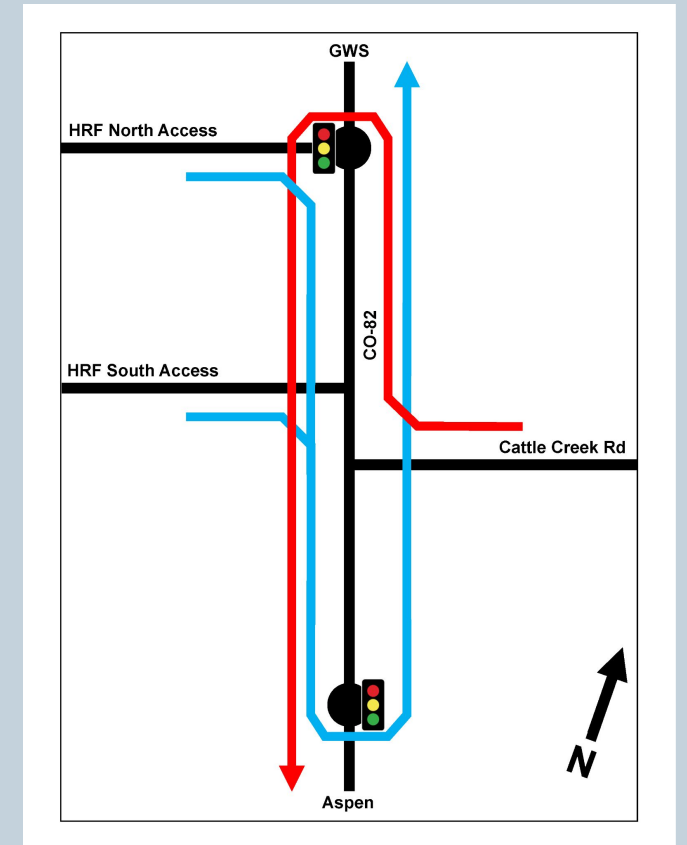
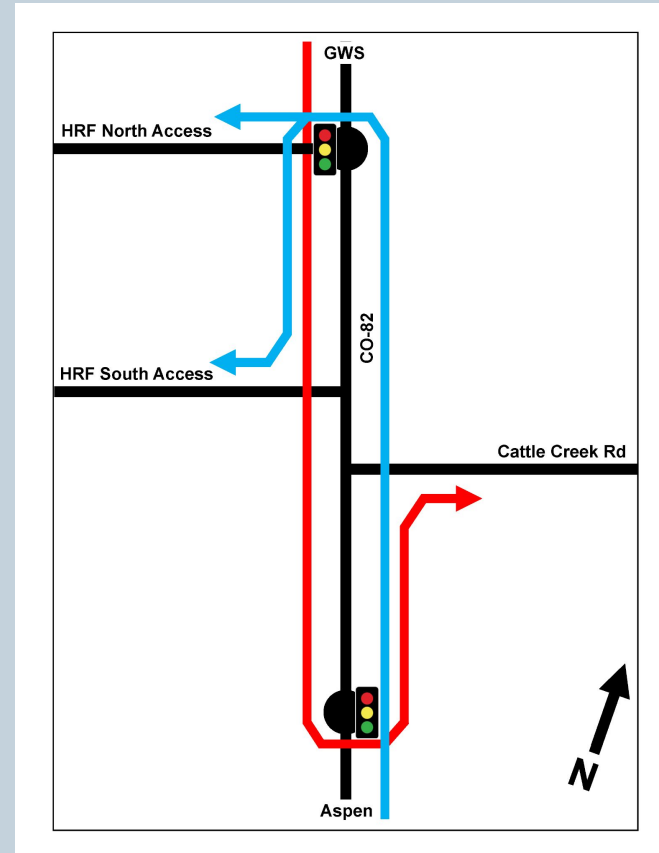
- Narrative description of the construction phases / **with duration, types, and frequency of heavy truck traffic**
- Access Road Segments to be impacted; **and**
- **Average Daily Traffic count information for all impacted segments, including counts of construction truck traffic**
- **None of this information is in the Traffic Impact Study**
- **20+ years of heavy construction traffic affecting safety, congestion, noise, traffic delays, quality of life and structural integrity of roads- PROPOSAL MUST BE DENIED**



Image is AI Generated

Hwy 82 Impact~Currently 27,000 Vehicle trips per day

- Developer estimates **12,000** new vehicle trips per day
- **Almost a 50% increase in use on Hwy 82!!**
- Complex Reduced Conflict Intersection with **2 new stoplights** and **2 U-Turns**



RFTA Comment–Jan. 12, 2026 Letter

- “The initial concept of direct bus access onto the property utilizing right-in/right-out movements and protected U-turns—is not consistent with efficient transit operations. **Absent grade-separated crossings allowing pedestrians to access the up valley and down valley routes and buses to remain on existing route paths, service directly to the site is not considered viable.**”
- The HRF development could add up to 200 more riders per day requiring 8 additional BRT trips and \$2.2 Million in additional costs. “...
- **RFTA’s position remains that the cost of providing adequate transit service levels attributable to the Harvest Roaring Fork development, including increased service frequency and peak-period capacity, is the responsibility of the applicant. “**

Directly conflicts with Developer’s position that residents will be using mass transit and thereby limiting traffic impacts





Fire Risk, Emergency Access & Evacuation



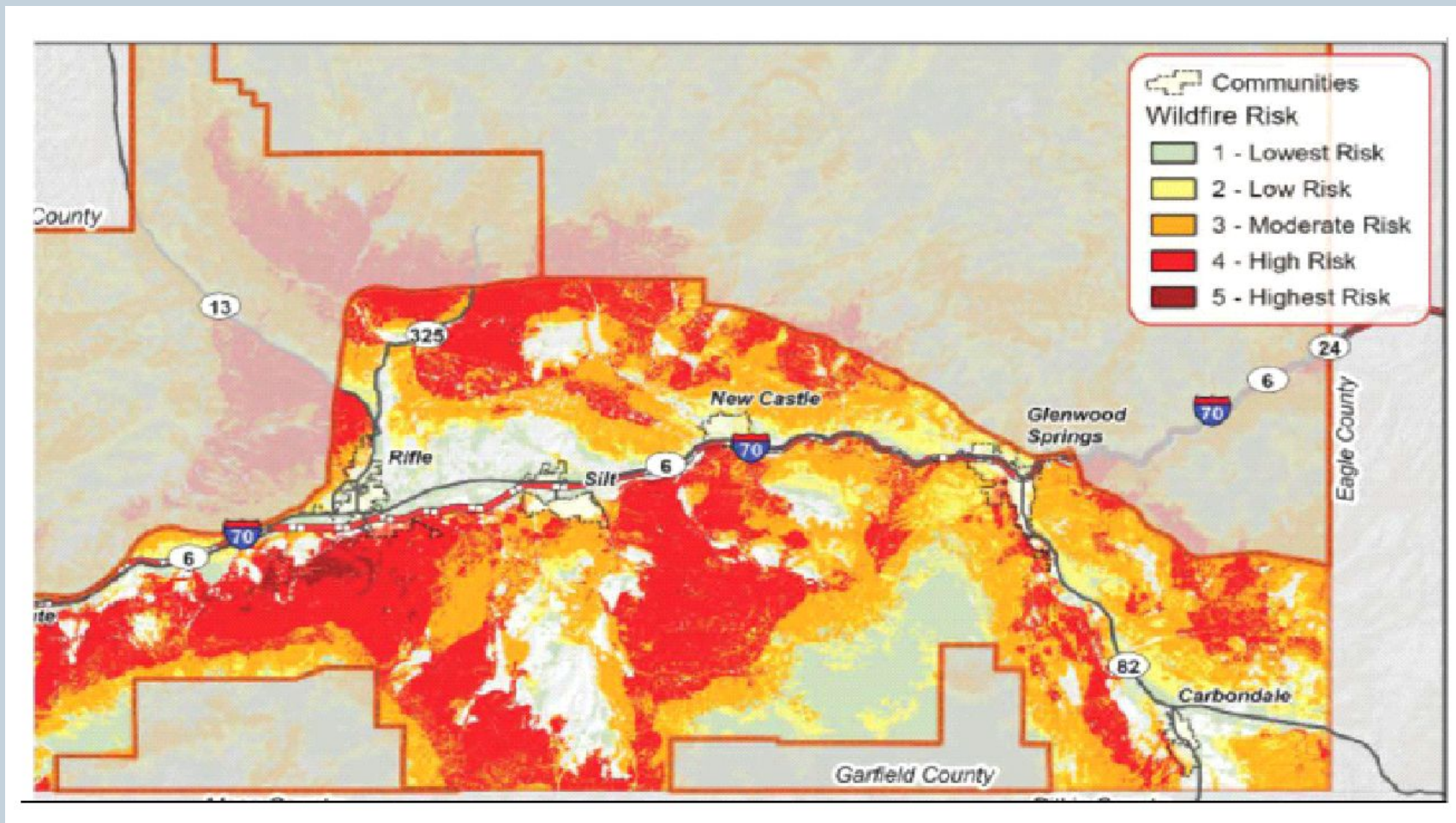
Emergency Evacuation

- **Serious Concerns about whether people from Glenwood Springs to Carbondale can safely evacuate in case of a major fire or other emergency.**
 - Current traffic on Hwy 82 probably exceeds ability for rapid evacuation
 - Traffic forecasts show our transportation infrastructure is overloaded
 - Impact of **4800 new residents** in evacuation zone

Define Safe Carrying Capacity

- How do we define “safe” carrying capacity?
- Is there a number of vehicle trips per day that exceeds a “safe” load for emergency evacuation?
- Impact of 4800 more people in evacuation zone
- BOCC agreed to hold work session on evacuation concerns but plan is NOT completed



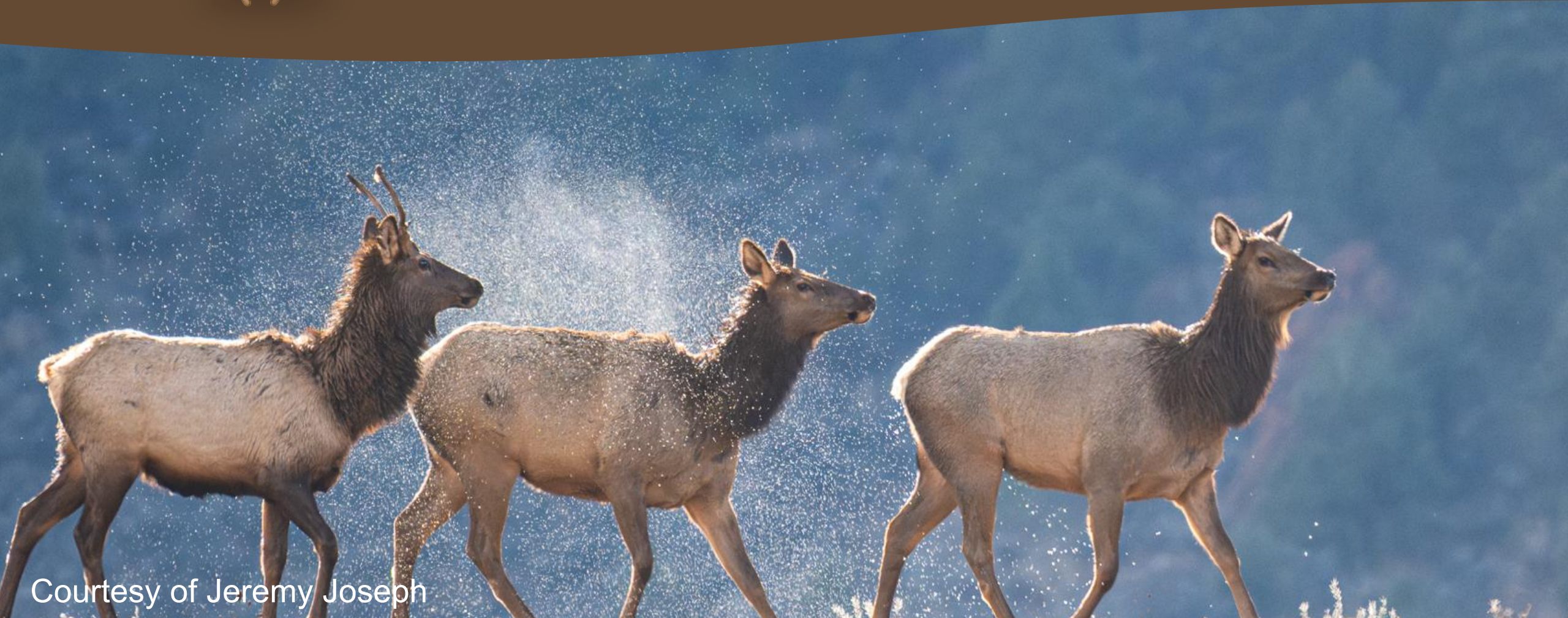


Comprehensive Plan Section 8, Policy 3 (iii)--Discourage development in areas of high or extreme wildfire hazards

Garfield County Community Wildfire Protection Plan (2022) shows high to extreme risk pockets in the HRF development area



Wildlife

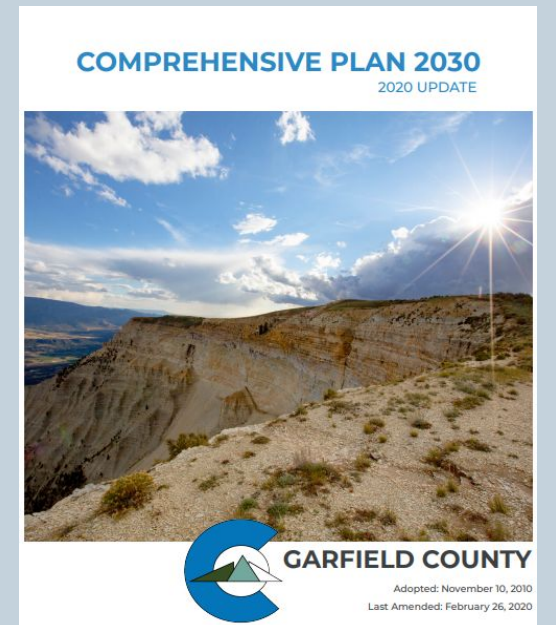


Courtesy of Jeremy Joseph

Key Land Use & Development Code Issues

Wildlife & Natural Resources

- Development must **avoid disrupting wildlife migration** routes, increasing predation risks, and increased interaction with vehicles (7-202)
- Developers are required to **protect existing wildlife habitats** permanently
- Growth should align with responsible land use to protect heritage and community safety



Wildlife Issues

- The proposed development is located in critical **wildlife habitats**, including **elk and deer wintering grounds**
- Loss of habitat and fragmentation (1500 residential units + commercial development) will **displace elk and deer**



Courtesy of Steven Harding



Courtesy of Jeremy Joseph

Wildlife Protections



Courtesy of Steven Harding

- ❖ Must ensure protection of riparian zones
- ❖ Must ensure protection of Heron Rookery Zone
- ❖ Must ensure protection of historic osprey nests
- ❖ Must ensure protection of Conservation Easement and how to keep humans and dogs out of sensitive zones
- ❖ Must mitigate human/wildlife conflict and minimize wildlife deaths on Highway 82



Environmental Impact



Light Pollution and Dark Skies Protection



- Light pollution disrupts wildlife, impacts human well being, and blocks our view of the universe.
- Nocturnal animals need darkness for survival, and the circadian rhythms of humans and plants rely on an unaltered night sky.
- Commercial lighting, street lights, and hotel lights are far more damaging than simple residential lighting.

Water Quality

- Potential harm to Roaring Fork River from runoff, pollution, construction across River
- Potential harm to riparian zone and aquatic ecosystem

Air Quality

- 20+ years of construction with attendant dust and pollution from diesel trucks
- Pollution from 12,000 more vehicle trips per day

Biodiversity Loss

- Habitat Destruction: Clearing land for construction sites, infrastructure development
- Fragmentation: Dividing habitats, isolating populations of species

Noise Pollution

- 20+ years of heavy construction noise
- Disruption to local community
- Stress on wildlife



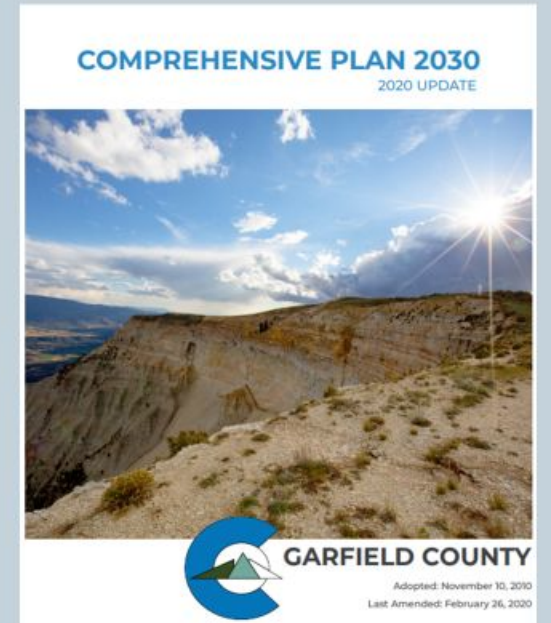
Water Quality & Supply



Key Land Use & Development Code Issues

Water Regulations

- **Requires confirmation of adequate, reliable, physical, and long-term water supply (7-104)**
- New projects must mitigate impacts on water/sewer systems (Policy 3)
- Land use reviews should consider water quality and domestic well impacts
- **Water quality and quantity must be preserved through strict wastewater and surface use regulations**



Water Quality Impacts

- Construction across Roaring Fork River will impact fish and riparian habitat
- Effect of stormwater and other runoff from development into river
- Direct draw of water from river during drought
- Impact of constructing new surface water treatment plant





Affordable Housing Issues



Housing

- Harvest Roaring Fork is *NOT* a workforce housing project.
- Failure to comply with the LUDC Article 8.
- Failure to provide a compliant schedule for “Mitigation Housing” construction.
- Creating more demand for housing than will be provided-
Blaine County Idaho Report.
- “Non-regulatory” resident occupied units are not the answer.
- No commitment to affordability.
- No commitments at all.

Mitigation Units

- HRF Phasing Plan (Exhibit F) does not provide a firm schedule for construction of mitigation units.
- HRF requests construction schedule and units pricing that are inconsistent with LUDC Article 8 requirements.
- HRF does not identify location, unit type, or sale/rental mix.
- The Blaine County Idaho New Development Impact Report confirms that new employee household demand will exceed required mitigation units.

Units/Square Feet	Employee Households
1,500 units	130
10,000 square feet of office space	10
8,000 square feet of new restaurant/bar space	10
37,000 square feet of retail/service space	37
60,000 square feet 120 room hotel	20
Total Households	207

- HRF proposes building “about 75 units per year” or only 7.5 mitigation units annually.

Housing

Final Report

The Economics of Land Use



New Development's Impacts on Community Housing Demand in Blaine County, Idaho

A Nexus Study of New Commercial and Residential Development, Employee Generation, and Demand for Community Housing

Prepared for:

Blaine County Housing Authority & Wood River Land Trust

Prepared by:

Economic & Planning Systems, Inc.

July 2024

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Findings

This Nexus Study quantifies the number of employee households generated by new commercial and residential development (or expansion of existing buildings) in Blaine County. The results are shown in **Table 9** and **Table 16** and summarized below. The methodology used to establish the number of employee households generated is described in detail in **Chapter 2** and **Chapter 3**.

New commercial development will be occupied by businesses and organizations with additional or new staffing needs. By reviewing the density of employees associated with existing commercial uses, the Nexus Study derives the impact of new commercial development on the need for community housing.

- For every 1,000 square feet of new office development, 1.00 employee household is generated.
- For every 1,000 square feet of new retail/ service development, 1.00 employee household is generated.
- For every 1,000 square feet of new restaurant/ bar development, 1.25 employee households are generated.
- For every 1,000 square feet of new industrial/ light industrial development, 0.66 employee households are generated.
- For every 1,000 square feet of new institutional development, 0.66 employee households are generated.
- For every 1,000 square feet of new lodging development, such as a hotel, 0.33 employee households are generated.

In addition to quantifying the community housing demand generated from new commercial development, the Nexus Study also analyzes the specific incomes of employee households generated by different types of development by accounting for the occupation profiles and distributions specific to each land use (e.g. office vs. industrial). For additional details, see **Table 9** in **Chapter 2**. New market-rate housing is occupied by households with income levels that can afford the purchase price. New home prices vary by unit size and geographic location in Blaine County and therefore the income of households that can afford to occupy the new homes vary accordingly. The Nexus Study analyzes recent residential sales data to identify these geographic differences and determine the approximate incomes of households that can afford new homes. Using the IMPLAN model, EPS derives the number of employees—and then employee households—generated from spending patterns of the new occupants based on household income.

- For every 100 units of new market-rate residential development occupied by households whose annual income is less than \$81,794, about 7.7 employee households are generated.
- For every 100 units of new market-rate residential development occupied by households whose annual income is greater than \$81,794 and less than \$200,000 (> \$81,794 and ≤ \$200,000), about 9.7 employee households are generated.
- For every 100 units of new market-rate residential development occupied by households whose annual income is between \$200,000 and \$300,000, about 7.0 employee households are generated.
- For every 100 units of new market-rate residential development occupied by households whose annual income is between \$300,000 and \$400,000, about 10.3 employee households are generated.

Resident Occupied “Deed Restricted” Units

- No draft of the Deed Restriction to establish terms and conditions.
- No breakdown between rental and sale units.
- No designation of neighborhood locations, unit sizes, or bedroom mixes.
- No schedule for construction of Deed Restricted units in HRF Phasing Plan.
- Market pricing does not equal affordability - \$400,000 for a 450 square foot unit.
- The HRF Executive Housing Summary is “Non-regulatory” meaning no enforceable commitment to affordability, unit type, sizes, or bedroom mix.
- No mechanism for administration – no administrative funding service.
- Negative impacts far outweigh speculative benefits.
- There are better options – Development near existing urban areas as contemplated by the Comprehensive Plan.



Affordable Housing For Whom?



- Studio apartments with a price range of \$3,133 - \$3,358 per month at Tree Farm Lofts.
- 555 square feet.
- Density does not equal affordability.



Cattle Creek Confluence Coalition Recommendation

The Cattle Creek Confluence Coalition requests that the Planning Commission **DENY** the Harvest Roaring Fork Development Proposal given issues with **code noncompliance, inadequate developer response to water, roads, and wildlife concerns, community-established character impact and incompatibility with the surrounding land uses.**

Thank you for your time today. We appreciate your commitment to **responsible and sustainable** land use planning.