

**BOARD OF COUNTY COMMISSIONERS**  
**March 12, 2019**  
**PLANNING CASE #PLN18-059: KEYSTONE MINOR PUD AMENDMENT**  
**UPDATE TO THE EMPLOYEE GENERATION RATES**

**PUBLIC HEARING**

**PLANNING CASE #18-059:** Class 6 - A Minor Modification to the Keystone PUD to update the Employee Generation Rates, as required by Section B.6.C.iii.c of the PUD, and other modifications to accomplish the foregoing.

**PROJECT INFORMATION:**

Location: Keystone Minor PUD Amendment  
Project/Request: A Minor Modification to the Keystone PUD to update the Employee Generation Rates, as required by Section B.6.C.iii.c of the PUD, and other modifications to accomplish the foregoing.

**SNAKE RIVER BASIN PLANNING COMMISSION RECOMMENDATION:**

The Snake River Planning Commission does not review Minor PUD Amendments

**RESOLUTION STATUS**

Resolution to be drafted subsequent to BOCC decision

**STAFF RECOMMENDATION:**

Approval with 7 findings

**ATTACHMENTS:**

Attachment A: Study of Employee Generation Rates –Revised December 12, 2018  
Attachment B: 2017-2018 Employee Housing Annual Report – dated September 28, 2018  
Attachment C: EPS Review of Keystone PUD Employee Generation Rates – Dated December 5, 2018  
Attachment D: Draft Amended PUD Designation



PLANNING DEPARTMENT

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**STAFF REPORT**

**TO:** The Board of County Commissioners (“BOCC”)

**FROM:** Lindsay Hirsh, Senior Planner

**FOR:** Meeting of March 12, 2019

**SUBJECT:** PLN18-059: A Minor Modification to the Keystone PUD to update the Employee Generation Rates, as required by Section B.6.C.iii.c of the PUD, and other modifications to accomplish the foregoing.

**APPLICANT:** Vail Summit Resorts, Inc.

**REQUEST:** Class 6: A Minor Modification to the Keystone PUD to update the Employee Generation Rates, as required by Section B.6.C.iii.c of the PUD, and other modifications to accomplish the foregoing.

**PROJECT DESCRIPTION:**

**Location:** Keystone Resort PUD  
**Legal Description:** See PUD  
**Existing Zoning:** Keystone Resort PUD

**BACKGROUND:**

The Keystone Resort PUD was originally approved on March 27, 1995. This PUD has undergone numerous revisions over the years in order to reflect the desired development for the resort and to better address market conditions as they change with time and trends. As originally approved, the PUD required the Owner/Developer to provide employee housing for a certain percentage of the employees within the PUD, and adjacent resort operations. The original requirement obligated the Owner/Developer to provide housing for 40% of the total Full Time Equivalent (FTE) employees. A FTE is calculated by combining the credits as defined in the PUD associated with full time, part time and seasonal employees, which are defined according to the average number of hours worked per week and the number of months employed per year. As part of the employee housing requirement, and not in addition to it, the Owner/Developer was required to house 60% of the seasonal employees. In order to confirm that the Owner/Developer has fulfilled their employee housing obligation, an annual employee housing report is required to be submitted by September 30 of each year which indicates the number of employees employed within the PUD, and adjacent resort operations, for the previous ski season and demonstrates that housing is provided for the required number of employees. The 2017-2018 Annual Keystone Housing Report, submitted in September 2018, (Attachment B) is attached for the BOCC’s reference.

The PUD requires that the employee generation rates be updated every three years until build-out of the owner/developer’s property. The frequent updates are necessary to adjust to market and economic conditions to ensure that employees are being adequately counted for in the annual employee housing report, adequately projected for future development, and to ensure that there is adequate employee housing as required by the PUD Designation. The most recent update was approved February 14, 2014.

To ensure that the Owner/Developer provides employee housing concurrent with the construction of new employee generating development projects, the generation rates for the requisite type of development must be applied to estimate the number of employees that will require housing (designated as Classification II in both the annual report and the generation rate report). The employee generation rates are an estimate of the number of employees that are likely to be generated by different types of businesses or land uses, including hotel/lodge, multifamily dwellings, retail establishments and food and beverage establishments and single family development. As a development project is reviewed during the site plan review process, the number of employees anticipated to be generated by the project is determined and compared to the existing supply of housing. Based on the most recent annual Housing Report, if adequate housing is available to accommodate the existing employee housing requirement that exists at the time, plus the new housing that will be necessary to accommodate the additional employees generated by the project, then, in most cases, no new housing will be required. This requirement is applicable whether a property located within the PUD is developed by the applicant or a third party developer. If housing is not available to accommodate the additional employees expected to be generated by the project, a condition is added to the site plan approval indicating that additional housing will need to be provided prior to the issuance of a certificate of occupancy for the project.

The annual employee housing report mentioned above originally required the Owner/Developer to indicate the exact number of employees working within the boundaries of the PUD, and adjacent resort operations. Third-party businesses, i.e. businesses that are not owned by the Owner/Developer, Keystone Neighborhood Company or Vail Summit Resorts (VSR), are also requested by VSR to provide employee numbers for their businesses, however in many cases those third-party businesses do not provide this information. For this reason, on March 11, 2002 the Board of County Commissioners (“BOCC”) approved a major amendment to the employee housing provisions of the Keystone PUD which, among other changes, included a new classification of employee generation rates which may be used to “estimate” the number of employees working at third party business and document those numbers in the annual employee housing report (designated as Classification I). Classification I differs from the Classification II rates described above, because with Classification I, the business is existing as either a retail or food and beverage commercial space, whereas Classification II applies to businesses at the site plan stage, where the final commercial use may not have been designated as either retail or food and beverage. Consequently, there are two different “employee generation” rates currently utilized in the Keystone PUD: the rate applied to new construction at site plan review for purposes of determining if adequate housing is being provided for both existing and new employees generated by the new construction, and the rate applied to estimate the current number of employees working within the PUD, which encompasses third-party businesses.

The “Study of Employee Generation Rates” (“report”), prepared by RRC, was originally submitted on August 8, 2018 and subsequently amended twice following staff and third-party review comments. The final report (Attachment A) revised on December 12, 2018 is attached for the BOCC’s review. It should also be noted that Staff had the study reviewed/analyzed by a third party (Economic & Planning Services “EPS”) whose review is also attached (Attachment C) for the BOCC’s review/reference.

Current Generation Rates:

(1) Classification One

<u>Land Use</u>	<u>Unit</u>	<u>Employees</u>
Hotel/Lodge	Room	.23
Multi-family dwelling	Unit	.20
Retail Establishments	1,000 sq. ft.	2.58

Food/Bev. Establishments	1,000 sq. ft.	4.77
Single-family	Less than 2,000 sq. ft.	.08
	2,000 to 3,999 sq. ft.	.15
	4,000 to 5,999 sq. ft.	.32
	More than 6,000 sq. ft.	.47

Seasonal Employees shall be calculated at 30.7% of the totals from the generation rates listed above.

(2) Classification Two

<u>Land Use</u>	<u>Unit</u>	<u>Employees</u>
Hotel/Lodge	Room	.23
Multi-family dwelling	Unit	.20
Retail/F&B Establishments	1,000 sq. ft.	3.61
Single-family	Less than 2,000 sq. ft.	.08
	2,000 to 3,999 sq. ft.	.15
	4,000 to 5,999 sq. ft.	.32
	More than 6,000 sq. ft.	.47

Per the revised 2018 study, the generation rates **proposed** by the applicant are as follows:

(1) Classification One

<u>Land Use</u>	<u>Unit</u>	<u>Employees</u>
Hotel/Lodge	Room	0.31
Multi-family dwelling	Unit	0.24
Retail Establishments	1,000 sq. ft.	2.92
Food/Bev. Establishments	1,000 sq. ft.	4.33
Single-family	Less than 2,000 sq. ft.	0.07
	2,000 to 3,999 sq. ft.	0.13
	4,000 to 5,999 sq. ft.	0.30
	More than 6,000 sq. ft.	0.45

Seasonal Employees shall be calculated at 30.7% of the totals from the generation rates listed above.

(2) Classification Two

<u>Land Use</u>	<u>Unit</u>	<u>Employees</u>
Hotel/Lodge	Room	0.31
Multi-family dwelling	Unit	0.24
Retail/F&B Establishments	1,000 sq. ft.	3.63
Single-family	Less than 2,000 sq. ft.	0.07
	2,000 to 3,999 sq. ft.	0.13
	4,000 to 5,999 sq. ft.	0.30
	More than 6,000 sq. ft.	0.45

**Generation Rate Discussion:**

Based on the submitted Employee Generation Rate Report, the Classification I rate (existing businesses) for Hotel/Lodge would increase from 0.23 to 0.31, the rate for multi-family would increase from 0.20 to 0.24, the rate for retail would increase from 2.58 to 2.92, and the rate for F&B Establishments would decrease from 4.77 to 4.33. The single family generation rate would decrease slightly for each home size range.

For Classification II (new construction), the rate for Hotel/Lodge would increase from 0.23 to 0.31, the rate for multi-family would increase from 0.20 to 0.24, Retail/F&B Establishments would increase slightly from 3.61 to 3.63, and the single family generation rate would decrease slightly for each home size range. A detailed explanation for each rate change is included in the Generation Rates report.

**Retail and Food and Beverage Employee Generation Rates:**

VSR hired RRC Associates to conduct the study needed to update the employee generation rate report. RRC prepared the most recent generation rate report in 2013, as well as all the reports dating back to 2001. To update the generation rates for these uses, employee surveys are conducted of businesses within the Lakeside and River Run villages. The businesses are asked how many employees work full-time and part-time during the ski season (November 1 - April 30) and how many of those employees work more than 6 months per year. Of the 30 businesses asked to participate in the online survey, 14 businesses provided employment data (46% response rate). Following multiple email reminders and other methods of contact, data from the 2017-2018 Annual Employee Housing Report was used to augment property-specific responses for the non-respondents. A total of 26 retail and food and beverage establishments were included in the 2018 research. Restaurants located within hotel/lodge properties are included in the generation rates.

Since many employees in the County hold more than one job, an adjustment to the calculations is made using the “multiple job holding” rate, as done in previous reports. This rate is derived from the Summit County Workforce Housing Needs Assessment which was released in 2013 (note, the multiple job holding rate was not updated in the 2016 Housing Demand Update). As depicted below, the employees living in Summit County hold an average of 1.23 jobs during the winter season and 1.22 jobs on average year round. This number is used in Keystone to translate the number of jobs into employees.

<b>Average Number of Jobs Held by Season</b>		
<b>Season</b>	<b>Average # Jobs Held (2007/08)</b>	<b>Best Available Estimate 2013</b>
Summer	1.22	1.20
Ski/Winter	1.20	1.23
Average	1.20	1.22

Source: Summit County Workforce Housing Needs Assessment, 2013

Per the report, the Job Generation Rates are calculated by dividing the “total number of jobs” for each business category (retail and food and beverage) by the “total square footage” of all businesses in each business category, then multiplying by 1,000 to generate jobs per 1,000 square feet. Each category was then divided by 1.23 to adjust for the multiple job holding during the winter season. Additional information about the methodology is included in the report.

As noted below, the 2018 Generation Rate for Food and Beverage Employees is 4.33 (employees per 1000 square feet) which is a from the previous rate of 4.77. The Generation Rate for Retail Employees has increased from 2.58 to 2.92. While these changes in job generation rates may appear significant, EPS in their third-party review did not find that the report suggested any major changes in employment patterns, and noted that the decrease in Food and Beverage rates was essentially offset by the increase in Retail generation rates.

**FTE Employee Generation Rates Calculated From 2018 Surveys of  
Businesses at River Run and Lakeside Village**

	Retail Establishments	Food/Bev. Establishments <sup>1</sup>	Retail/F&B Establishments
Number of businesses in calculation	11	16	27
Job Generation Rate (jobs per 1,000 square feet)	3.57	5.28	4.58*
Jobs per employee	1.22	1.22	1.22
FTE Employee Generation Rates (FTE per 1,000 square feet)	2.92	4.33	3.76*

\*Weighted results based on number of responding establishments

Source: April 2018 surveys (calculations by RRC) and 2017-18 Annual Keystone Employee Housing Report

The report also includes the following comparison of the 2013 average generation rates with the proposed 2018 generation rates:

**Job Generation Rate Averages, 2013 Compared to 2018**

	2013	2018	Rolling Average
Overall	4.33	4.58	4.46
Bar/Restaurant	5.72	5.28	5.50
Retail	3.10	3.57	3.34

**Hotel/Lodge and Multi-Family Generation Rates**

The generation rates for hotels and managed condominiums were calculated from data provided directly by the Keystone Human Resources Department rather than from a merged database. Keystone HR provided the number of hotel rooms and managed units in their portfolio and the number of employees associated with each property type. The report calculated 0.37 employees per hotel or lodge room and 0.29 employees per managed condo/home. RRC compared these results to data from numerous other housing studies that they had completed and found that the Keystone generation rates are lower due to comparable lower cost and more limited service housing and lodging market than other areas in their database. These rates were then divided by 1.23 to account for multiple job holding.

**Single Family Generation Rates**

In the 2009 generation rates review, a condition was added that required the next update to include rates for employees generated by single-family homes. Residential dwelling units generate demand for housing through their operation and maintenance. Examples of activities that typically generate employees include exterior and interior maintenance and upkeep (i.e. house cleaning, meal preparation, childcare, and personal services).

The first study of single-family employee generation was conducted in 2013. That report as well as the current report uses data derived from the RRC Merged Residential Job Generation Database which includes a variety of mountain resorts and a residential formula. RRC's merged data base includes data collected over the past three decades (1990-2016) and includes 199 hotel/lodge properties and 43 property management companies. The list of nearby communities used in the database is located on Page 5 of the 2018 Employee Generation Rate Report (Attachment A).

RRC has found that the number of jobs generated increases with the size of the home. Due to that fact, RRC proposes that a range of generation rates be approved which set the rates according to the home size as follows:

**Residential Employee Generation Rates by Single Family Home Size - 2018**

<b>Size of Single Family Unit (Square Feet)</b>	<b>Modeled Square Feet</b>	<b>Modeled FTE Employees Single Family Units</b>
<1,000 s.f.	1,000	0.07
1,000 - 1,999	1,500	0.08
2,000 - 2,999	2,500	0.12
3,000 - 3,999	3,500	0.16
4,000 - 4,999	4,500	0.26
5,000 - 5,999	5,500	0.39
6,000 - 6,999	6,500	0.58

Source: RRC Associates Merged Residential Job Generation Database, 2018

Based on 2018 Summit County Assessor data the following table was prepared:

**Summary of Single-Family Homes in Keystone PUD by Home Size Excluding Garages**

<u>House Size in S.F.</u>	<u>Number of Homes</u>	<u>Percent of Total</u>
<2,000	8	4%
2,000 to 3,999	100	52%
4,000 to 5,999	77	40%
Equal to or greater 6,000	<u>7</u>	<u>4%</u>
	192	100%

Source: Summit County Assessor’s Office, May 2018

Keystone has a relatively low percentage of single family homes over 6,000 sq. ft. when compared to other mountain resorts. As depicted above, the majority of homes (52%) are in the 2,000 to 3,999 sq. ft. range, the 4,000 to 5,999 square foot homes make up approximately 40%, with less than 4% of homes over 6,000 sq. ft.

For comparison purposes, RRC prepared the following table to illustrate the changes from the 2013 report to the proposed 2018 report:

**Single Family Employee Generation Rates by Home Size  
2018 Results Compared to Figures Currently Used**

<b>Size of Single Family Unit (Square Feet)</b>	<b>Modeled Square Feet</b>	<b>Current Requirements Based on 2013 FTE Employees/Single Family Unit</b>	<b>Results of 2018 Analysis Employees/Single-Family Unit</b>
Less than 2,000 s.f.	1,500	0.08	0.07
2,000 to 3,999 s.f.	3,000	0.15	0.13
4,000 to 5,999 s.f.	5,000	0.32	0.30
More than 6,000 s.f.	6,000	0.47	0.45

Source: RRC Associates, 2018

As the comparison table illustrates, the generation rates generally decrease slightly for each home type.

**Current Keystone Employee Housing:**

Per the 2017/2018 employee housing report (Attachment B), and as depicted below, there is currently a surplus of employee housing for both Peak Season and Seasonal Employees:

Total Number of Employees for Employee Housing Calculation	2,585.30
Total EHCs Allocated to Peak Season Employee Housing	1,153.00
Number of EHCs Required for Peak Season Employees	1,034.12
<b>Surplus of EHCs for Peak Season Employees</b>	<b>118.88</b>
Total EHCs Allocated to Seasonal Employee Housing	1,006.00
Number of EHCs Required for Seasonal Employees	720.41
<b>Surplus of EHCs for Seasonal Employees</b>	<b>285.59</b>

Staff applied the proposed generation rates to the 2017/2018 Annual Keystone Employee Housing Report to determine how the new generation rates and resulting Employee Housing requirement calculation may be impacted and found the following:

2017-2018 Employee Housing Requirements	Using current generation numbers	Using Proposed Generation numbers
Total Number of Employees for Housing Calc	2585.30	2600.71
Total EHC Allocated to Peak Season Housing	1153.00	1153.00
Number of EHC required for Peak Season	1034.12	1040.28
Surplus of Peak Season EHC	118.88	112.72
Total EHC allocated to Seasonal	1006.00	1006.00
Number of EHC Required for Seasonal	720.41	723.73
Surplus of EHC for Seasonal	285.59	282.27

Using the proposed generation numbers results in a slightly higher number for the total of number of for both Peak and Seasonal Employees, and therefore a slightly higher EHC requirement and a slightly lower EHC surplus for both categories.

As indicated in Attachment C, overall, it was EPS' opinion the RRC report used the best available data to estimate the current employee generation rates in the Keystone PUD. EPS did recommend that a minor calculation issue be revised, and the report re-submitted. The minor calculation change dealt with how the Retail/F&B employee generation rate was calculated. EPS suggested that the report change the calculation from a simple average to a weighted average based on the number of food and beverage establishments in the sample. The applicant has made the suggested revision, which is reflected in the final proposed generation rates discussed in this staff report.

### **Summary**

In summary, Staff finds that the employee generation rates proposed based on the methodology used in calculating the proposed rates is consistent with the currently best available information and methodology. The next update to the generation rates would be due in 2021.

### **CRITERIA FOR DECISION:**

Section 12203.02 of the County's Land Use and Development Code ("Code") states that the BOCC may approve a minor PUD amendment, only if the application meets all relevant County regulations and standards and provided the BOCC makes the following findings:

- A. The proposed PUD modification is consistent with the efficient development and preservation of the entire PUD.
- B. The proposed PUD modification does not affect, in a substantially adverse manner, either the enjoyment of land abutting upon or across a street from the PUD or the public interest.
- C. The proposed PUD modification is not granted solely to confer a special benefit upon any person.
- D. The proposed PUD modification is in general conformance with the goals, polices/actions and provisions of the Summit County Countywide Comprehensive Plan and any applicable basin or subbasin master plans.
- E. The proposed PUD modification is consistent with the purpose and intent of the County's Zoning Regulations and Rezoning Policies.
- F. The proposed PUD modification is consistent with public health, safety and welfare, as well as efficiency and economy in the use of land and its resources.
- G. The proposed PUD modification amendment is not substantial and conforms to the intent and integrity of the original PUD and the PUD modification has been determined to be a minor amendment in accordance with Section 12202.04.

### **The Proposed PUD Modification is Consistent with the Efficient Development and Preservation of the Entire PUD**

The modification is consistent with the efficient development and preservation of the entire PUD in that no additional density is being proposed and the goals and objectives of the PUD will continue to be met specifically including the requirement to meet the housing requirements of employees who work within the PUD and who work within the adjacent resort operation.

### **The Proposed PUD Modification does not affect, in a Substantially Adverse Manner, Either the Enjoyment of Land Abutting Upon or Across a Street from the PUD or the Public Interest**

The modification does not affect, in a substantially adverse manner, either the enjoyment of land abutting upon or across a street from the PUD or the public interest because no new development, permitted

uses, or density are proposed under this amendment. It is in the public interest that the Owner/Developer of the PUD provide accurate and up to date employment numbers and verify compliance with the employee housing requirements of the PUD.

**The Proposed PUD Modification is not Granted Solely to Confer a Special Benefit Upon any Person**

The modification is not granted solely to confer a special benefit upon any person. This modification amends the generation rates in the employee housing section of the report and further fulfills the employee housing obligations set forth in the PUD that must be met by Vail Summit Resorts and all developers of land located within the boundaries of the PUD.

**The Proposed PUD Modification is in General Conformance with the Goals, Polices/Actions and Provisions of the Summit County Countywide Comprehensive Plan and any Applicable Basin or Subbasin Master Plans**

The proposed PUD modification is in general conformance with the goals, polices/actions and provisions of the Summit County Countywide Comprehensive Plan and the Snake River Master Plan because the changes proposed will continue to ensure that there is adequate employee housing for employees working within the Keystone PUD.

**The Proposed PUD Modification is Consistent with the Purpose and Intent of the County's Zoning Regulations and Rezoning Policies**

Staff has concerns related to parking and traffic that are and have been impacting the Keystone area. When the Keystone PUD was approved in 1995, it was intended as a destination resort, where day skier visitation was not the primary customer base. As the resort operation has evolved, it appears that due to factors such as the growth of the Denver metro area and the expansion of multi-resort ski pass offerings, that day skiers are now the primary customers at Keystone, which has caused unforeseen impacts to traffic and parking. County staff has been conducting ongoing monitoring of the traffic and parking situation at Keystone, and has been documenting observations from various entities (i.e. Sheriff's Office, Road and Bridge, Housing Department, and the Zoning Compliance Officer) related to these concerns. At this point in time, it does not appear that the current state of parking is out of compliance with the PUD. However, Staff continues to be concerned that the existing PUD language regarding parking may not adequately address the changed conditions. Staff will continue to monitor consistency with the zoning and overall PUD compliance regarding parking and traffic.

With regards to the rest of the County's zoning and rezoning policies, the PUD Modification is consistent with the Code's zoning and rezoning policies because no new density is proposed and the modifications will not affect the PUD provisions in place which ensure that land with development constraints are avoided, that new development is compatible with existing development, that there is adequate infrastructure, and that wildfire hazards are mitigated.

**The Proposed PUD Modification is Consistent with Public Health, Safety and Welfare, as Well as Efficiency and Economy in the Use of Land and its Resources**

In light of the purpose and intent of PUD designations and modifications, the proposal furthers the public health, safety integrity and general welfare, as well as efficiency and economy in the use of land and its resources because the modification continues to ensure that there will be adequate employee housing available for employees within the PUD.

**The Proposed PUD Modification Amendment is not Substantial and Conforms to the Intent**

**and Integrity of the Original PUD and the PUD Modification has been Determined to be a Minor Amendment in Accordance with Section 12202.04**

Section 12202.04 of the Development Code states that the Planning Director shall determine whether the proposed zoning amendment to modify a PUD is considered major or minor in nature. A proposed amendment is considered minor if it meets the following criteria for decision:

- A. The PUD modification is not substantial and maintains the intent and integrity of the original PUD.
- B. The PUD modification does not increase in the total number of units or floor area.
- C. No new uses are requested, except for converting one (1) type of permitted use to another similar type of permitted use.
- D. There is no significant decrease in the amount of open space.

The proposed PUD amendment meets the four criteria listed above and furthermore, the PUD specifically states that the update to the generation rates is to be processed as a minor PUD amendment. Again, as discussed more thoroughly above, Staff is aware of concerns related to parking and traffic that are impacting the Keystone area, but feels that because the issue appears to be regarding the existing language in the PUD failing to adequately address the original intent of the PUD to provide for adequate parking, it may be better addressed in a more comprehensive PUD amendment. As it stands, this minor PUD amendment to update the Employee Generation Rates is consistent with the intent and integrity of the original PUD.

**STAFF RECOMMENDATION:**

Staff recommends that the BOCC approve PLN 18-059, a Minor Modification to the Keystone PUD to update the Employee Generation Rates, as required by Section B.6.C.iii.c of the PUD, and other miscellaneous modifications to accomplish the foregoing with the following findings:

Findings:

1. The modification is consistent with the efficient development and preservation of the entire PUD in that no additional density is being proposed and the goals and objectives of the PUD will continue to be met specifically including to meet the housing requirements of employees who work within the PUD and who work within the adjacent resort operation.
2. The modification does not affect, in a substantially adverse manner, either the enjoyment of land abutting upon or across a street from the PUD or the public interest because no new development, permitted uses, or density are proposed under this amendment.
3. The modification is not granted solely to confer a special benefit upon any person. This modification amends the generation rates in the employee housing section of the report and further fulfills an obligation set forth in the PUD that must be met by Vail Summit Resorts.
4. The proposed PUD modification is in general conformance with the goals, policies/actions and provisions of the Summit County Countywide Comprehensive Plan and the Snake River Master Plan because the changes proposed will continue to ensure that there is adequate employee housing for employees working within the Keystone PUD.
5. The proposed PUD modification is consistent with the County's Zoning and Rezoning Policies because, without limitation; a) the PUD modification does not affect established setbacks, permitted uses, density, landscaping, open space, parking or other development standards; b) the PUD modification will continue to ensure the compatibility of land uses, efficient and economical use of land and adequate light and air in development projects; c) areas of environmental hazards will continue to be avoided; d) development projects will continue to be functional, exhibit good design and aesthetics and protect the County's natural resources and scenic beauty; and e) the modifications will not affect the PUD provisions in place which ensure that land with development constraints are

avoided, that new development is compatible with existing development, that there is adequate infrastructure, and that wildfire hazards are mitigated.

6. In light of the purpose and intent of PUD designations and modifications, the proposal furthers the public health, safety integrity and general welfare, as well as efficiency and economy in the use of land and its resources because the modification continues to ensure that the PUD Owner/Developer provides accurate documentation of the number of employees generated by the resort operations and associated uses and complies with the employees housing requirements of the PUD.
7. The proposed PUD modification amendment is not substantial and conforms to the intent and integrity of the original PUD and the PUD modification has been determined to be a minor amendment in accordance with Section 12202.04 because, without limitation, a) the PUD modification is not substantial and maintains the intent and integrity of the original PUD; b) the PUD modification does not increase in the total number of units or floor area; c) no new uses are requested, except for converting one (1) type of permitted use to another similar type of permitted use; and d) there is no significant decrease in the amount of open space.

**Attachments:**

Attachment A: Study of Employee Generation Rates –Revised December 12, 2018

Attachment B: 2017-2018 Employee Housing Annual Report – dated September 28, 2018

Attachment C: EPS Review of Keystone PUD Employee Generation Rates – Dated December 5, 2018

Attachment D: Draft Amended PUD Designation