

# Technical Memorandum

March 1, 2022

Project# 26648

To: Crook County Community Development Staff  
300 NE 3rd St.  
Prineville, OR

From: Jacki Gulczynski, PE and Marc Butorac, PE

RE: Crossing Trails Destination Resort – Crook County, OR 97754

## FEBRUARY 25<sup>TH</sup>, 2022 COMMENT RESPONSES

This document is a response to the February 25<sup>th</sup>, 2022 Letter of Incompleteness provided by the Crook County Planning Department regarding the Crossing Trails Destination Resort Application (DR-08-0092). Included in this memorandum are the comment responses related to transportation. The letter references a review document prepared by Transight Consulting, LLC on February 15<sup>th</sup>, 2022. It should be noted that the review comments are related to draft scoping information that has since been addressed in the Transportation Impact Analysis (dated January 18, 2022) and the Supplementary Memorandum (dated February 18, 2022). Comment from Transight Consulting are italicized, and responses are provided below in standard text.

### Comments Related to Preliminary Recommendations Memorandum (August 18, 2021)

#### COMMENT 1:

*The Plan and Policy review provided includes a brief summary of identified projects throughout the study area, associated costs, and their status. One item of note is that the roundabout at the OR 126/Tom McCall Road was designed as a single-lane roundabout as an interim configuration to maximize safety. The status of the roundabout as "complete" simplifies the potential widening needs that were included within the design discussions for this project and will need to be reviewed, but it should not be assumed that the design meets the long-term needs.*

*On this same note, the OR 126/Powell Butte roundabout is conditioned on the Hidden Canyon destination resort. This was approved through the modification of the original application, but reflects a "pooled contribution" from several smaller impacts toward a priority Crook County safety and operational issue. The application for the Crossing Trails resort should assess whether the single-lane roundabout continues to support the long-term needs with Crossing Trails' additional impacts. A pro-rata share should be provided toward these long-term needs (based on current cost information) to avoid a scenario where subsequent development is not contributing an equitable share of the overall system needs. Similar to Hidden Canyon, this may be part of a pooled contribution towards priority area needs.*

#### Response 1:

The TIA addresses the long-term needs at OR126/Tom McCall (see Page 14 & 23).

The proposed mitigation recommendations include the contribution to the OR126/Powell Butte Hwy intersection with 4% added total volume to the intersection (estimated contribution = \$120K) (see Page 36)

## COMMENT 2:

Table 6 provides an updated summary of potential mitigation costs by intersection, but it appears that the percentages may have been miscalculated. Regardless, the proportion of impact would not be a suitable metric if the impact of the added trips changes the overall intersection needs. If, for example, the added trips result in the need for an additional southbound right-turn lane this could easily exceed the \$79,200 cost included in the table and would fully be the responsibility of the applicant. Accordingly, until specific site impacts throughout the study area and changes in long-term plans are known, Table 6 summary provides limited value in assessing the impacts of the project. It does appear that the cited costs are low relative to current ODOT project estimates and will need to be reviewed with ODOT and the County roadmaster.

### Response 2:

Table 6 in the Preliminary Recommendations Memo is out of date and not included in the submitted TIA. The updated summary of conditions is provided on page 36 of the TIA. Additionally, none of the intersections except for OR126/Parrish Lane meets mobility standards in the future background condition and exceed standards in the build condition. Therefore, the example regarding full responsibility no longer relevant.

## COMMENT 3:

The section titled "Status of Neighboring Destination Resorts" appears to include several development projects within the City of Prineville, some of which remain active and others that have been substantially modified since their original approval. Please coordinate with Josh Smith for corrected information and status on the City projects cited.

### Response 3:

A list of current destination resorts was included in the TIA (see Page 21). Email correspondence with Will VanVactor on November 15<sup>th</sup>, 2021, confirmed no other in process developments needed to be included in the report and could be represented in the regional growth.

## COMMENT 4:

I will defer to Crook County staff as to whether the density changes within Remington Ranch have been formally adopted; a formal CIA with ODOT has not been finalized.

### Response 4:

N/A

## Comments Related to Scoping Memorandum (November 12, 2021)

### COMMENT 1:

The unique characteristics of a destination resort will introduce unique types of vehicles and levels of traffic into the rural agricultural lands that have not been accounted for in the County's long-range planning and forecasting. On this note, some of the issues of concern are as follows:

- The need for safe access onto and off of OR 126.
- Accommodation of larger and slower vehicles within the operational analysis to capture the potential impacts or RVs.
- Physical accommodation needs to bring the manufactured homes into the site.

- *Wiles Road is identified for closure in the County TSP; specific information on the applicant's proposal to close this road will be needed within the TIA.*
- *The surrounding roads are narrow and lack shoulders, and there are structural needs (particularly at culverts). Given the travel increase and potential loading increase depending on the quarry site used and routes, bringing the primary resort access routes into structural and dimensional compliance with County standards will be critical.*

#### Response 1:

- A safety review is provided on Page 18 of the TIA. Additionally, turn lanes are included as a recommended mitigation improvement at OR126/Parrish Lane intersection, the primary access to the site, to improve operations and safety (see Page 33).
- The site does not include RV parking, as is described on Page 28.
- The applicant, ODOT, and County may coordinate construction traffic and single use permits as applicable.
- The current approved application includes the closure of Wiley Road. This closure is included in the Crook County TSP and funding partners are identified as ODOT and the County.
- Structural and pavement needs including geotechnical borings and pavement analysis are not typically included in traffic studies nor requested through the scoping efforts with the City, County, and ODOT.

#### COMMENT 2:

*In addition to review of the County's adopted Transportation Impact Analysis requirements, the application will also require compliance with the Transportation Planning Rule. The destination resort was not included within the travel forecasts of the County's adopted Transportation System Plan. It is my understanding that the County's prior destination resort overlay zone identified lands that were eligible for the resort siting criteria, not lands that would or could be developed as resorts, which is also why these lands were not assumed within the County's (or ODOT's) long-range planning. Therefore, this application will require a long-range analysis, although the build-out timeline of a destination resort would be similarly expected to occur over a 20-year period. It may be helpful to review the Crook County growth assumptions and provide a comparison.*

#### Response 2:

The January 18<sup>th</sup>, 2022, submitted TIA is a modification to the original study completed in 2008 (see Page 38). The 2008 study was approved and is being updated as part of this application. The 2008 approval addressed Transportation Planning Rule (TPR) requirements. The approved study was completed before the Crook County TSP was adopted in 2017. The findings and recommendations are shown on page 45 in the TIA. Finally, County Code compliance is addressed on Page 38.

#### COMMENT 3:

*Trip generation estimates included within the scoping materials were based on a 2006 study that was conducted at Eagle Crest and Black Butte Ranch, rather than the more recent surveys completed at Brasada or use of the 2021 data within ITE's 11th Edition of the Trip Generation manual. These other materials may or may not be more appropriate, and the applicant should expand on this discussion given the unique characteristics of a manufactured home park/RV park resort. If, for example, the RV park or manufactured homes became a more desirable location for data center employees to rent it could shift travel patterns, but also could result in much higher year-round occupancy than is present at other area resorts. Additional information from the applicant would be helpful in understanding this issue.*

*Internal workforce housing could provide a useful reduction in off-site trip generation potential, but the information presented in the report does not support its classification with ITE Land Use 210 (which describes*

a suburban single-family detached home) or justify the provided internalization rate that would be expected if it were in fact occupied by resort employees. The scoping states the following:

*"The workforce housing...is intended to provide convenient housing for employees of the resort. While employment at the resort cannot be conditioned to occupants of the resort, it was assumed a conservative 25% internalization of peak hour trips between the workforce housing and the resort."*

The description of this housing and its stated classification as workforce housing may be better described within other land use documents provided by the applicant, but within the transportation materials it is unclear as to how this would function. If the applicant cannot guarantee or limit the use of the homes to resort employees, it does not seem reasonable to conclude that this would be resort housing.

I would recommend that the applicant review the workforce housing component of the recently approved Hidden Canyon Resort and how the resort will manage this component long-term. It is my understanding that within Hidden Canyon the resort will own and manage the employee housing to ensure its long-term use is restricted to employees. Without a mechanism to limit, monitor, or enforce the single-family housing as workforce housing trip reductions would not apply.

The overall trip generation rates do not appear to be unreasonable, but further narrative would be helpful given the significant variation in characteristics between the proposed resort and those cited in the scoping materials at resorts with entirely different characteristics. There are substantial differences between the trip characteristics at Sunriver, Black Butte, Eagle Crest, Brasada, and Tetherow Resorts related to their location, target market, amenities, and price point, as well as the destination resort requirements that were in place at the time of their development. In addition, with a resort that is located farther from services such as Brasada we see trip rates that are different than those being experienced at Eagle Crest. With that said, most other resorts report full-time occupancy within the 20% to 30% range, and most serve as a second home with very limited utilization for the services and tax base provided.

#### Response 3:

The trip generation rates applied to the Brasada and Hidden Canyon development are 25% lower than those used for this development. Therefore, the trip generation used and shown on Page 28 of the TIA are a conservative estimate compared to recently revised neighboring destination resort applications.

The workforce housing identified for the development will not include a legally binding agreement requiring inhabitants to work at the resort. Therefore, since residents will have flexibility to work wherever, yet the housing is within proximity to the resort, it was estimated a conservative, reasonable percentage of residents would not use the regional transportation network due to working at the resort. Additionally, ITE Land Use 210 – Single Family Detached Housing is the most conservative, applicable land use to use for workforce housing and therefore, would not underestimate trips onto the regional network.

#### COMMENT 4:

*The trip distribution estimate provided within the report shows that the majority of trips will travel west toward the population centers in Redmond and Bend, with about 40 percent destined toward the east. The study indicates that the distribution patterns are based on current travel patterns and "accounts for employer generators near OR 126/Tom McCall, i.e., Facebook, Apple, the Airport..."*

While the travel patterns are primarily comprised of employee trips, 2019 traffic counts at the OR 126/Tom McCall Road intersection show the reverse travel pattern from what is included in the scoping materials. The 2019 counts show that 55% of the trips at Tom McCall are headed toward Prineville, 3% continue south onto Millican Road, and 42% travel west toward Redmond and Bend. This would result in a higher impact toward the City of Prineville and would place higher left-turn demands onto the OR 126 corridor during the

evening commute period at Parrish Lane. It will be important to understand the long-term operations of Parrish Lane, particularly with comments below related to the trip assignment and routing of trips via Houston Lake Road.

Finally, the trip distribution figure indicates that 5% of the trips will be “internal” near the data centers. While 5% of the trips may be destined towards these sites, these trips will certainly impact Crook County and ODOT facilities and would not be considered “internal” to the resort.

#### Response 4:

Review of the 2021 traffic count data collected at OR126/Tom McCall Road indicated 42% of the volume was coming to/from the east leg of OR126 toward Prineville. This confirms the use of a 40% distribution toward Prineville. Additionally, the Hidden Canyon resort traffic study completed by Transight Consulting – located approximately the same distance from OR126 as Crossing Trails – assumed 15% of the trips were to/from Prineville.

The intersections included in the TIA comply with Crook County Code Requirements stating a TIA should evaluate intersections that receive site-generated trips that compromise at least 10 percent or more of the total intersection volume. At the request of City of Prineville staff, a supplementary memorandum was prepared on February 18, 2022, to include two City intersections: OR370/OR126 and OR126/US26.

Finally, the 5% of trips identified near the data centers are accounted for in the trip assignment with the impact, if applicable, to OR126/Tom McCall Road (see Figure 10 of the TIA on page 31).

#### COMMENT 5:

The trip assignment is provided within Figure B1 and shows how the estimated trips (from Table 1) are assigned to the transportation system. There are several items of concern noted with this assignment:

- The trip assignment does not include the site access locations so it is not clear whether the trip assignment matches the trip generation rates presented.
- The County's Transportation System Plan identifies the planned closure of the Wiley Road intersection with OR 126 but this is not yet a funded improvement and would need to occur with the project if approved by the County Roadmaster. The August materials indicate that this is assumed, but it would be important to understand the applicant's agreement on the timing of this closure occurring with initial construction.
- The trip assignment in Figure B1 will need to be revisited. It appears that half the trips to and from Prineville are assigned along Huston Lake Road which seems unreasonable given the roadway network and characteristics, unless supported with travel time runs. It also appears that Intersection 11 (OR 126/Tom McCall) may have been rotated incorrectly in the graphic as it shows no resort trips traveling towards Prineville – this will need to be revised so as not to impact the applicant's operational analysis.

#### Response 5:

The trip assignment has been updated in the TIA (see Figure 10 on page 31). The assignment includes the site access points. OR126/Wiley Road is assumed to be closed and should be coordinated with the County Roadmaster.

#### COMMENT 6:

The report shows 40% of the weekday p.m. peak hour trips continuing east of the Tom McCall Road toward the Prineville “Y” Junction. Similarly, there are 55% of site-generated trips to and from areas west of the OR

*126/Powell Butte Highway, yet locations beyond this distance that were included in the original report and showed significant impacts have now been omitted as part of this update.*

*The levels of trip generation shown will easily exceed City of Prineville and ODOT analysis thresholds at the Prineville "Y" Junction, and will also exceed the City of Redmond's thresholds to the west. As the affected transportation service providers their relevant standards will govern this element of the scoping. Please reference the City of Prineville Transportation System Plan (Volume 1) Appendix 1 (which includes an impact threshold of 25 or more weekday p.m. peak hour trips) to coordinate the potential impact area necessary through the City's transportation system, and coordinate the scope west of Crook County with Deschutes County and the City of Redmond. Study to the west should minimally assess the same area as the original study.*

**Response 6:**

The intersections included in the TIA comply with Crook County Code Requirements stating a TIA should evaluate intersections that receive site-generated trips that compromise at least 10 percent or more of the total intersection volume. At the request of City of Prineville Staff, a supplementary memorandum was prepared on February 18, 2022, to include two City intersections: OR370/OR126 and OR126/US26.

**COMMENT 7:**

*Additional information and discussions related to the collection and use of traffic counts will be important prior to commencing with the analysis, particularly if the applicant is proposing to consider a Saturday time period as presented. Addition of a Saturday analysis will add substantial data collection and report preparation cost increases, and since it does not align with the County's Transportation System Plan or ODOT's design hour it is questionable what value it will provide or what questions this additional analysis is intended to answer.*

*In addition, there are significant seasonal changes that occur along the OR 126 corridor throughout the year, and with the data centers there are other variations in traffic counts that should be considered, particularly with the amount of approved development present in the campus.*

**Response 7:**

A Saturday analysis was completed (see page 8) to be consistent with past destination resort studies, to capture recreational users and trip generators such as the development, and because AM peak trip rates were 25% lower than PM peak trip rates. The PM peak hour was proven to be the peak period for analysis and mitigation purposes, however, the Saturday peak period provided additional context for weekend traffic conditions.

Seasonal variation and trends were considered and discussed on Page 14 on TIA.

**COMMENT 8:**

*The roads surrounding the Crossing Trails Resort were constructed to support low-volume agricultural use. Information will be needed from the applicant on the primary travel and access routes, how the current cross-section complies with County standards, and the pavement structural conditions (particularly at culverts/bridge crossings). It will be important to identify the primary construction routes to the site, particularly as the nearest quarry is on the opposite side of Wiley Road that the applicant cites is planned for closure.*

**Response 8:**

Primary travel routes are shown in the trip distribution and trip assignment figures in the TIA (Figure 9 and 10, respectively). Existing transportation facility information is provided in Table 4 on Page 12. Construction routing and traffic control is not included in Section 18.180 or 18.116 in the County Code.

## **Conclusion**

The comments provided by Transight Consulting have largely been addressed through correspondence with the agency staff and technical updates included in the TIA and furthermore described in the responses throughout this memorandum. Please let us know if you need any additional information as part of this comment period.