

**LAST DOLLAR P.U.D. ASSOCIATION  
P.O. BOX 1106  
TELLURIDE CO, 81435**

January 31, 2023

*Via Email: [kayes@sanmiguelcountyco.gov](mailto:kayes@sanmiguelcountyco.gov)*

Kaye Simonson, San Miguel County Planning Director  
San Miguel County Planning Commission  
San Miguel County Board of Commissioners

RE: Comments from Last Dollar P.U.D. Association (the “**Association**”) regarding the  
Planned Unit Development Application for the Society Turn Parcel submitted by  
Genesee Properties, Inc. (“**Genesee**”)

Dear Ms. Simonson:

As the San Miguel County Planning Commission (“**CPC**”) turns its focus back to the Society Turn Parcel application, the Last Dollar P.U.D. Association (“**LDPUD**”) is taking this opportunity to reiterate areas of specific concern regarding the impact of the proposed development. In prior comments and submissions, LDPUD and its affected owners have repeatedly acknowledged the significant public benefit of the land donations to the Telluride Hospital District and Regional Waste Water Treatment Plant. While our enthusiasm over these aspects of the project has not changed, we remain extremely concerned that the CPC has not adequately considered the impact the overall development will have on traffic. Namely, in light of the multitude of high density uses, including office, retail, lodging, employee housing and flex space, it is crucial that current traffic patterns, safety-related issues and the volume of expected traffic are thoroughly analyzed and reviewed.

In that connection, we are resubmitting the letter dated July 15, 2021, from SM Rocha, LLC, the Last Dollar’s traffic consultant (“**SM Rocha**”) to enable your staff to better evaluate the traffic impacts at the intersection of CO 145. The enclosed correspondence highlights the contribution the Society Parcel Development will make to roadway traffic and motor vehicle volume and outlines recommendations for a Transportation Plan. SM Rocha thoroughly reviewed the Traffic Impact Study submitted by Genesee and identified multiple areas where the application fails to meet CDOT standards. Based on the recommendations of SM Rocha, at a bare minimum, the CPC should consider creating a two-way left turn lane at the Society Turn Parcel to avoid dangerous conditions along CO 145.

It is of the utmost importance that the CPC consider these infrastructure deficiencies, particularly in light of the recent District Court ruling addressing the Diamond Ridge Property. The comparison to Diamond Ridge is significant and based on the District Court’s analysis, the failure to perform due diligence in disregard of the Master Plan is unacceptable. As such, we respectfully request that the CPC refuse to proceed with this project until systematic planning and an accounting for the roadway improvement requirements is performed.

Sincerely,

LAST DOLLAR P.U.D. ASSOCIATION

By: /s/ Board of Directors



## SM ROCHA, LLC

TRAFFIC AND TRANSPORTATION CONSULTANTS

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July 15, 2021

Board of County Commissioners  
San Miguel County  
333 West Colorado Avenue  
Telluride, CO 81435

**RE: Recommendations for Regional Transportation Actions for Future Land Development  
(Society Turn Parcel Development)**

Dear Board of County Commissioners,

Please accept this letter as submitted in response to the County notice for public comment in advance of the July 21, 2021 hearing date for the Society Turn Parcel development. As noticed, written comments of more than one page may not receive full consideration if not submitted to the County Planning Department by July 14, 2021. SM ROCHA, LLC (SMR) expresses our sincere apology for this late submission and respectfully requests the Board of County Commissioners' full consideration of information presented hereinafter.

The Last Dollar Homeowners Association (LDHOA) has retained the office of SMR to provide peer review of the transportation network surrounding the Society Turn Parcel development (future Telluride Medical Center).

Upon review of transportation study documents provided with the Society Turn Parcel development, San Miguel County and Town of Telluride Transportation Plan information, and on behalf of LDHOA, suggestions and recommendations are provided for consideration to address future transportation needs resulting from current proposed and future land development actions.

The suggestions and recommendations are presented to aid essential travel needs along CO-145 (West Colorado Avenue) and CO-145 (Lawson Hill) to and from the Town of Telluride area and potentially relieve traffic congestion experienced by motorists from overcrowded roadways with no planned growth accommodations.

SMR recommends the following actions for consideration and implementation based on the need to allow for safe and efficient travel along the area roadway:

- **Create a Transportation Plan for Implementation within Area Growth –**  
The transportation plan would be a multi-modal plan covering the County limits, the Town of Telluride, future growth areas of other applicable municipalities, and CDOT. The plans focus would be the future 20-year horizon and should include conceptual roadway visions for the Buildout of the County and participating municipalities in order to preserve adequate right-of-way to accommodate long-term transportation needs.

This plan should provide overall guiding framework to communicate a vision for the County including information about existing conditions, deficiencies, and opportunities for improvement. The plan should also include evaluation of future motorized and non-motorized needs based on future land use projections and the overall vision for the County. It could look at the County and participating municipalities as a whole to view the broad range of issues that impact travel and mobility including land use, pedestrian, bicycle, and transit issues, rather than merely level of service, traffic counts and future modeling projections, which is what current development plans represent.

Suggested plan organization:

- Land Use and Socioeconomic Assumptions – describes the population, household, and employment projections used to define the County’s buildout scenario.
- Roadway Plan – presents the needs assessment, development and analysis of transportation alternatives, roadway plans for buildout, roadway functional classifications and design standards, and implementation costs for roadway improvements.
- Multi-Modal Transportation – identifies the planning efforts associated with providing a balanced transportation system with several mode options.

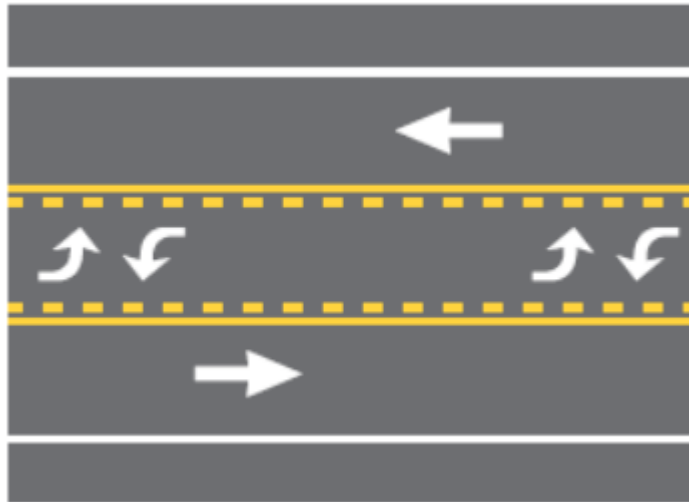
- **Create a Continuous Two-Way Left Turn Lane (TWLTL) –**

The potential safety and operational effects of TWLTL are well-recognized. The planning and implementation of a TWLTL is recommended for consideration as traffic congestion increases along CO-145 within the area of the Society Turn Parcel Development, with an immediate application for eastbound and westbound travel from the Keystone Hill Overlook, through the Society Turn/Mountain Village Roundabout, to the Town of Telluride.

Funding and additional right-of-way acquisition of a TWLTL, as well as any other transportation improvement envisioned through a Transportation Plan, could be included in specific requirements of a land development application or through an assessed transportation impact fee.

It is vital for a community approach to ensure funding sources are made available to encourage, and emphasize, the importance to implement needed improvements on CO-145, including the CDOT governed portions of CO-145 from the Keystone Overlook to the Society Turn Roundabout, in a manner that no objection could be made. Again, this funding can be done in form of both transportation impact fees for contributing new development, such as the Society Turn Parcel, and obtaining needed right-of-way to enable the TWLTL construction in critical areas of CO-145 such as from the Keystone Overlook to the Society Turn Roundabout.

The Federal Highway Administration (FHWA) provides the following example of a TWLTL:



In general, the creation of a TWLTL could offer several advantages which include:

- Improve overall roadway operations and safety.
- Limited road right-of-way requirements.
- Removal of left turning vehicles from the through lanes allowing vehicles to wait in the center lane until a safe gap in oncoming traffic is available before turning left. This can reduce delay to through vehicles and lead to a reduction in rear-end and sideswipe collisions.
- Provide spatial separation between opposing lanes of traffic which can lead to a reduction in head-on collisions.
- Function as a lane for emergency vehicles.
- Accommodate land development requirements for additional driveways and intersections leading to an increase in left turn volumes and may help to alleviate future problems with left turn movements.

Based on review of transportation study documents and the suggestions and recommendations described in this letter, it is believed that implementation of the TWLTL would provide great benefit in quickly improving traffic operations along CO-145 not only regionally but within the immediate area of the Society Turn Parcel development.

It is also recommended that the Board of County Commissioners and the Society Turn Parcel development consider the TWLTL concept and incorporate the potential concept into site development plans by either participation in additional roadway improvements and/or additional road right-of-way dedication along the development frontage.

These presented suggestions and recommendations are our professional opinion and believed to be appropriate as they will not only benefit the future traffic demands created by the Society Turn Parcel development but, most importantly, help structure the County and surrounding municipalities, including CDOT, as a unified community in the funding, implementation and accommodation of future transportation demands anticipated with regional growth projections and the level of in-fill development expected within the County and Telluride, CO area.

We trust that our public comment will assist the Board of County Commissioners in review of the Society Turn Parcel development. Please contact us should further assistance be needed.

Sincerely,

**SM ROCHA, LLC**

*Traffic and Transportation Consultants*

A handwritten signature in black ink, appearing to read "Mike Rocha", written in a cursive style.

Mike Rocha, TSOS, TOPS  
Principal