



Staff Report

PLANNING DIVISION
DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: Salt Lake City Appeals Hearing Officer
From: Mayara Lima, Principal Planner
(801) 535-7118 or mayara.lima@slcgov.com
Date: November 12, 2020
Re: PLNAPP2020-00570 – Reagan Billboard at 1049 S 300 W

Appeal of Administrative Decision

PROPERTY ADDRESS: 1049 S 300 W

PARCEL ID: 15-12-405-009

PARCEL DISTRICT: CG (General Commercial)

ZONING ORDINANCE SECTIONS:

- 21A.46.160 Billboards
- 21A.16 Appeals of Administrative Decisions

APPELLANT: Reagan Outdoor Advertising, represented by Josh Peterman

APPEAL ISSUE:

Salt Lake City made an administrative decision to deny a request by Reagan Outdoor Advertising, to construct a billboard on the property located at approximately 1049 S 300 W. The denial of the building permit BLD2020-02189 was based on the distance requirement from another billboard. The appellant claims that the interpretation of the requirement is incorrect.

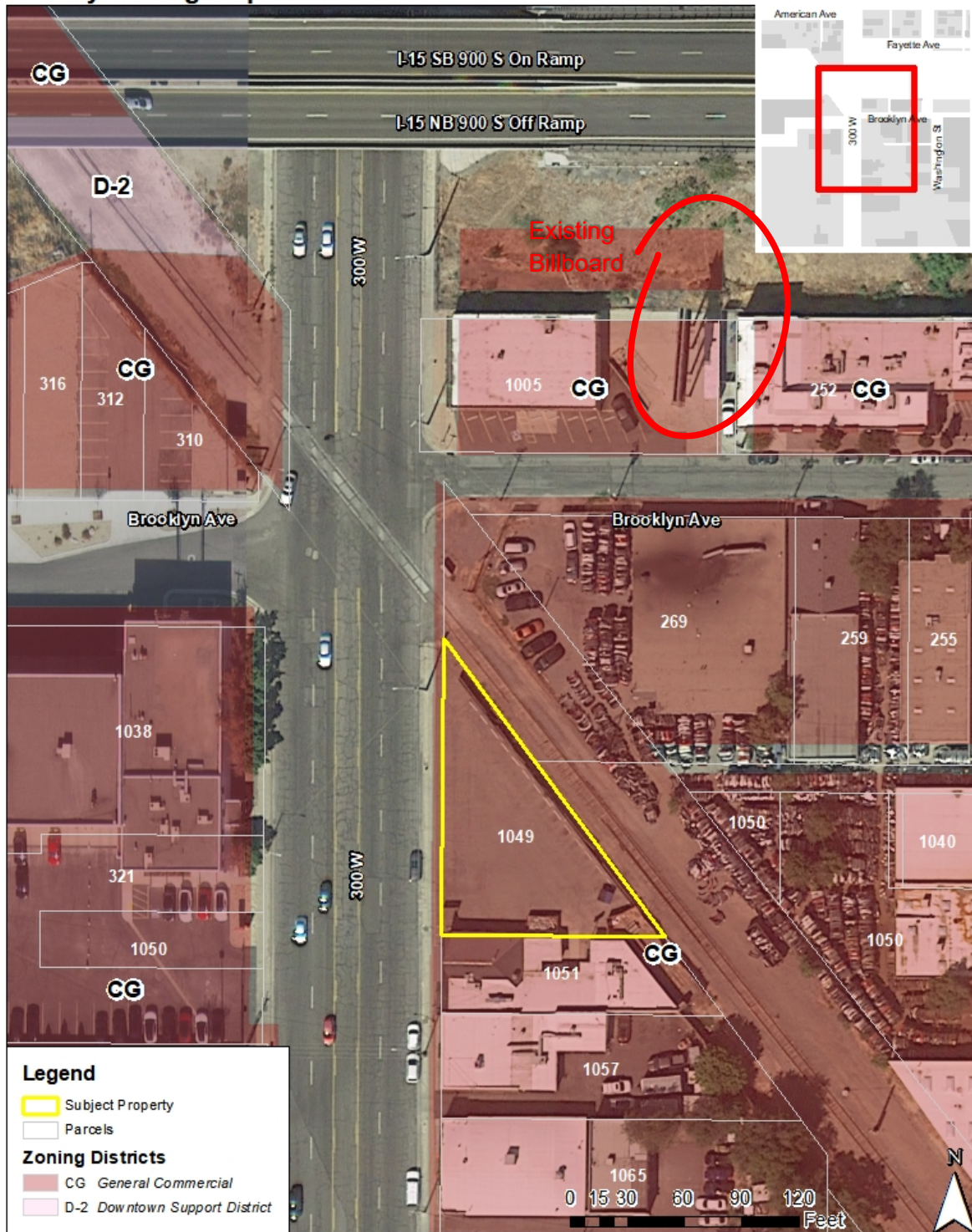
Please note that while the attached documents refer to the proposal as located on 1051 S 300 W, the parcel where the billboard would be constructed is addressed as 1049 S 300 W.

ATTACHMENTS:

- [Vicinity and Zoning Map](#)
- [Administrative Decision Letter](#)
- [Appeal Application and Arguments](#)
- [Salt Lake City Attorney's Response](#)

ATTACHMENT A: Vicinity and Zoning Map

Vicinity Zoning Map



ATTACHMENT B: Administrative Decision Letter

From: Paterson, Joel [mailto:joel.paterson@slcgov.com]
Sent: Friday, July 17, 2020 9:16 AM
To: Guy Larson; Victoria Lara
Cc: Norris, Nick; Robinson, Molly; Slark, Samantha; Nielson, Paul; Mikolash, Gregory; Hamilton, Kevin
Subject: RE: (EXTERNAL) RE: BLD2020-02189 letter - 1051 S 300 West

Mr. Larson,

I have notified the Building Services Division that the billboard permits at 1650 S State Street (BLD2020-02188) and 1051 S 300 West (BLD2020-02189) cannot be issued because the proposed billboards do not meet the spacing requirement in Salt Lake City Code Section 21A.46.160.T.1. This e-mail is intended to serve notice of final administrative decision regarding these two permits.

1650 S State – BLD2020-02188 – The proposed billboard at 1650 S State would be located within approximately 125 feet on an existing billboard located along the west property line of the same parcel.

1051 S 300 West – BLD2020-02189 – The proposed billboard at 1051 S 300 West would be located within approximately 250 feet of an existing billboard located on along the western property line of the parcel located at 1005 S 300 West.

You can appeal these final administrative decisions subject the provisions in Salt Lake City Code Section 21A.16 Appeals of Administrative Decisions. You can find the Appeal of a Decision application and instructions on filing the application online here. If you choose to file appeals regarding the administrative decisions a separate appeal application is required for each of the billboard permits applications.

Appeals of administrative decisions must be submitted within 10 calendar days. The computation of time is regulated in Salt Lake City Code Section 21A.04.020.F. which states:

“The time within which an act is to be done shall be computed by excluding the first and including the last day. If the last day is a Saturday, Sunday or legal holiday recognized by the City, that day shall be excluded.”

If you choose to appeal, the applications must be submitted by 5:00 pm on July 27, 2020.

Thank you,

JOEL PATERSON, AICP
Zoning Administrator

PLANNING DIVISION
DEPARTMENT of COMMUNITY and NEIGHBORHOODS
SALT LAKE CITY CORPORATION

Email: Joel.Paterson@slcgov.com
TEL 801-535-6141
FAX 801-535-6174

<https://www.slc.gov/planning/>

ATTACHMENT C: Appeal Application & Arguments



Appeal of a Decision

SALT LAKE CITY PLANNING

OFFICE USE ONLY

Project # Being Appealed:	Received By:	Date Received:
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Appealed decision made by:

Planning Commission
 Administrative Decision
 Historic Landmark Commission

Appeal will be forwarded to:

Planning Commission
 Appeal Hearing Officer
 Historic Landmark Commission

Project Name:

PLEASE PROVIDE THE FOLLOWING INFORMATION

Decision Appealed:
BLD2020-02189

Address of Subject Property:
1051 S. 300 W., Salt Lake City, UT

Name of Appellant: Reagan Outdoor Advertising	Phone: 801-363-4300
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Address of Appellant:
c/o Josh Peterman, 111 East Broadway, 11th Floor, Salt Lake City, UT 84111

E-mail of Appellant: josh@ck.law	Cell/Fax: 801-556-7323
-------------------------------------	---------------------------

Name of Property Owner (if different from appellant):
Axiom Properties, LLC

E-mail of Property Owner:	Phone: 801-674-8880
---------------------------	------------------------

Appellant's Interest in Subject Property:
Leasehold Interest

AVAILABLE CONSULTATION

Please call (801) 535-7700 if you have any questions regarding the requirements of this application.

APPEAL PERIODS

- An appeal shall be submitted within ten (10) days of the decision.
- Applicant of an HLC decision being appealed can submit within thirty (30) days of a decision.

REQUIRED FEE

- Filing fees must be submitted within the required appeal period.
- Filing fee of \$265, plus additional fees for required public notices and multiple hearings.

SIGNATURE

If applicable, a notarized statement of consent authorizing applicant to act as an agent will be required.

Signature of Owner or Agent: 	Date: 7/22/20
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SUBMITTAL REQUIREMENT

A written description of the alleged error and the reason for this appeal.

WHERE TO FILE THE COMPLETE APPLICATION

Mailing Address: Planning Counter
PO Box 145471
Salt Lake City, UT 84114

In Person: Planning Counter
451 South State Street, Room 215
Telephone: (801) 535-7700

INCOMPLETE APPLICATIONS WILL NOT BE ACCEPTED

JKP I acknowledge that Salt Lake City requires the items above to be submitted before my application can be processed. I understand that Planning will not accept my application unless all of the following items are included in the submittal package.

Additional Guidelines for Those Appealing a Planning Commission or Landmarks Commission Decision

A person who challenges a decision by the Planning Commission or the Landmarks Commission bears the burden of showing that the decision made by the commission was in error.

The hearing officer, according to state statute, must assume that the decision is correct and only reverse it if it is illegal or not supported by substantial evidence in the record.

“Substantial evidence” means information that is relevant to the decision and credible. Substantial evidence does not include public clamor and emotion. It involves facts and not mere speculation. A witness with particular expertise can provide substantial evidence, but conjecture and public opinion alone are not substantial evidence.

The “record” includes information, including the application by the person seeking approval, the staff report, the minutes of the meeting, and any information submitted to the commission by members of the public, the applicant or others, before the decision was made. It does not include facts or opinion, even expert opinion, expressed after the decision is made or which was not available to the commission at the time the decision was made.

A decision is “illegal” if it is contrary to local ordinance, state statute or case law, or federal law. An applicant is entitled to approval if the application complies with the law, so a person challenging a denial should show that the application complied with the law; a person challenging an approval should show that the application did not conform to the relevant law. Issues of legality are not restricted to the record of the decision, but the facts supporting or opposing the decision are limited to those in the record.

With regard to the factual information and evidence that supports a decision, the person bringing the appeal, according to a long line of decisions handed down by the Utah State Supreme Court and the Court of Appeals, has a burden to “marshal the evidence” and then to demonstrate that the evidence which has been marshaled is not sufficient to support the decision.

The appellant is therefore to:

1. Identify the alleged facts which are the basis for the decision, and any information available to the commission when the decision is made that supports the decision. Spell it out. For example, your statement might begin with: “The following information and evidence may have been relied upon by the Commission to support their decision . . .”
2. Show why that basis, including facts and opinion expressed to the commission is either irrelevant or not credible. Your next statement might begin with: “The information and evidence which may have been relied upon cannot sustain the decision because . . .”

If the evidence supporting the decision is not marshaled and responded to, the hearing officer cannot grant your appeal. It may be wise to seek the advice of an attorney experienced in local land use regulation to assist you.

Reasons for Appeal:

By email dated July 17, 2020, the City denied Reagan Outdoor Advertising's ("ROA") application to construct a billboard at 1051 S. 300 W., Salt Lake City, UT (BLD2020-02189).

The stated reason for the City's rejection was as follows:

The proposed billboard at 1051 S 300 West would be located within approximately 250 feet of an existing billboard located on along the western property line of the parcel located at 1005 S 300 West.

See email, attached hereto as Exhibit A.

The City's denial of ROA's application is incorrect. The ordinance relied on by the City to deny the permit provides that:

Billboards with an advertising face three hundred (300) square feet or less in size shall not be located closer than three hundred (300) linear feet from any other small billboard or eight hundred feet (800') from a large billboard on the same side of the street.

Salt Lake City Code 21A.46.160.T.1.(emphasis added).

The existing billboard is located on Brooklyn Ave. with an East/West orientation. The proposed billboard will be located on 300 W. with a North/South orientation. See rendering attached hereto as Exhibit B. These billboards are not "on the same side of the street." Rather, they will be located on different streets and the City's interpretation of the spacing requirement as simply a linear measurement from one sign to the other wholly ignores the language "on the same side of the street." This is an impermissible interpretation and violates the general rule that ordinances are not to be interpreted in a way that renders portions superfluous. See, e.g., *State v. Outzen*, 2017 UT 30, ¶ 9, 408 P.3d 334 ("This court also interprets statutes to give meaning to all parts, and avoids rendering portions of the statute superfluous").

When analyzing a similar scenario, the California Court of Appeal determined that:

The only way to prohibit the proposed sign based on the 600-foot spacing ordinance is to conclude the signs are on "the same side of the same street" because they are both visible to eastbound traffic on Little Santa Monica Boulevard. The ordinance, however, says nothing about signs that are visible from the same side of the same street. We decline to rewrite the ordinance in that fashion. The ordinance unambiguously states that it applies only to signs that are located on the same side of the same street, which these signs are not.

Van Wagner Commc'ns, Inc. v. City of Los Angeles, 84 Cal. App. 4th 499, 510, 100 Cal. Rptr. 2d 922, 929 (2000).

Similarly, the signs at issue in this matter are not on the same side of the street as contemplated by the ordinance. Because zoning laws are in derogation of a property owner's rights, they must be strictly construed against the City, and "provisions permitting property uses should be liberally construed in favor of the property owner." *Brown v. Sandy City Bd. of Adjustment*, 957 P.2d 207, 210 (Utah Ct. App. 1998). Had the City intended for the ordinance to apply generally to distance between signs, regardless of location, it could easily have worded it accordingly. Instead, the City chose to make the spacing requirement only applicable to signs that are on the same side of the street. Because these signs are located on different streets, the City's decision is incorrect and should be reversed.

Exhibit A

Joshua Peterman

Subject: FW: (EXTERNAL) RE: BLD2020-02189 letter - 1051 S 300 West

From: Paterson, Joel [<mailto:joel.paterson@slcgov.com>]

Sent: Friday, July 17, 2020 9:16 AM

To: Guy Larson; Victoria Lara

Cc: Norris, Nick; Robinson, Molly; Slark, Samantha; Nielson, Paul; Mikolash, Gregory; Hamilton, Kevin

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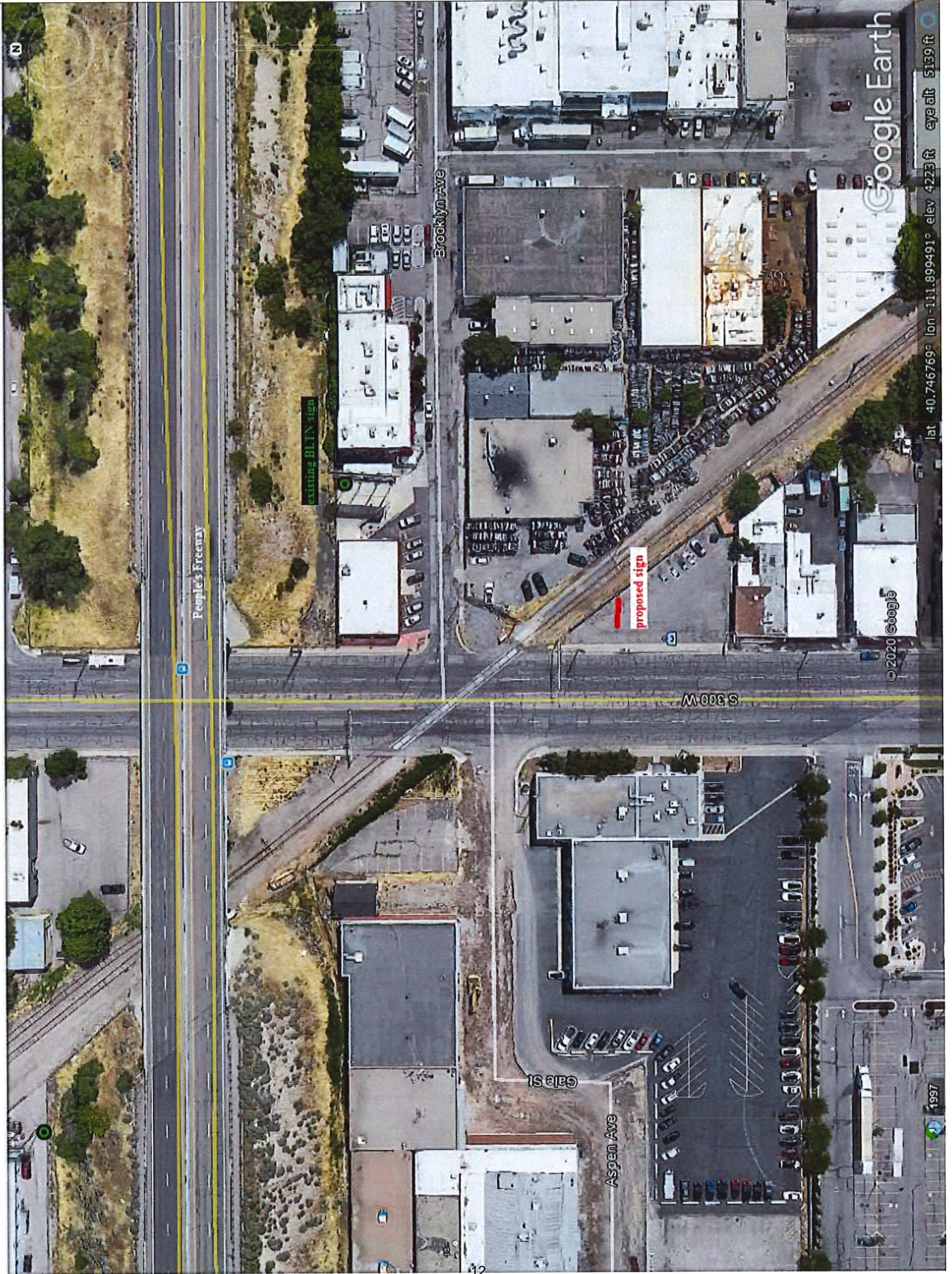
JOEL PATERSON, AICP
Zoning Administrator

PLANNING DIVISION
DEPARTMENT of COMMUNITY and NEIGHBORHOODS
SALT LAKE CITY CORPORATION

Email: Joel.Paterson@slcgov.com
TEL 801-535-6141
FAX 801-535-6174

<https://www.slc.gov/planning/>

Exhibit B



ATTACHMENT D: SLC Attorney's Response

ADMINISTRATIVE HEARING OF A LAND USE APPEAL

(Case Nos. BLD2020-02189 and PLNAPP-2020-00570)

(November 5, 2020)

Appellant: Reagan Outdoor Advertising

Decision Making Entity: Zoning Administrator

Request: Appealing the City’s denial of a request to construct a new/replacement billboard at 1051 S. 300 W., Salt Lake City, UT

Brief Prepared by: Samantha Slark, Senior City Attorney

On July 17, 2020, the Zoning Administrator notified Reagan Outdoor Advertising (“Reagan”) that its application for a permit to construct a new/replacement billboard using billboard credits did not meet the spacing requirements for use of those credits and the application was denied. Reagan has appealed that determination.

FACTS

1. Salt Lake City Code § 21A.46.160 sets forth a system by which the City will issue “credits,” if a billboard owner demolishes a billboard. *See generally* Salt Lake City Code § 21A.46.160.

2. Those “credits” may be used to construct a new or replacement billboard. *See* Salt Lake City Code § 21A.46.160.E, M & O.

3. The credits must be used within a certain period of time. *See* Salt Lake City Code § 21A.46.160.G.

4. The location of the new or replacement billboard must also comply with the rules governing where certain “credits” may be used and the ordinance’s spacing requirements. Salt Lake City Code § 21A.46.160.K, N-T.

5. Specifically, the ordinance states:

Billboards with an advertising face three hundred (300) square feet or less in size shall not be located closer than three hundred (300) linear feet from any other small billboard or eight hundred (800) feet from a large billboard on the same side of the street.

Salt Lake City Code § 21A.46.160.T.1.

6. Reagan submitted an application with the City seeking to construct a new or replacement billboard at 1051 South 300 West, using “credits” from previously demolished billboards. *See Exhibit A.*

7. The zoning administrator issued a decision stating the permit for the new or replacement billboard would be denied because the proposed location did not meet the 300-foot spacing requirement set forth in Salt Lake City Code § 21A.46.160.T.1. *See Exhibit B.*

8. Specifically, the communication stated:

I have notified the Building Services Division that the billboard permit[] at . . . 1051 S 300 West (BLD2020-02189) cannot be issued because the proposed billboards do not meet the spacing requirements in Salt Lake City Code section 21A.460160.T.1.

. . .

The proposed billboard at 1051 S 300 West would be located within approximately 250 feet of an existing billboard located along the western property line of the parcel located at 1005 S 300 West.”

See Exhibit B.

9. Reagan has appealed.

SUMMARY OF ARGUMENT

This appeal turns on the meaning of “same side of the street,” as used in Salt City Code § 21A-46.160.T.1. The City contends the term is intended to include any billboard that is located in the same geographic area in relation to a street. In this case, any billboard that is located to the east of 300 West, as opposed to any billboard that is located to the west of 300 West. This interpretation is consistent with the plain language of the ordinance and its stated purpose, gives effect to notable omissions, and avoids absurd results.

I. REAGAN’S APPLICATION DOES NOT MEET THE SPACING REQUIREMENTS OF SALT LAKE CITY CODE § 21A-46-160.T.1.

Reagan’s application does not meet the spacing requirements of Salt Lake City Code § 21A.46-160.T.1 and was properly denied. Where the proper interpretation of an ordinance is at issue, reference to Utah’s rules of statutory interpretation is appropriate.¹ One rule of statutory construction commonly applied is that, “[i]f there is doubt or uncertainty as to the meaning or application of the provisions of an act, it is appropriate to analyze the act in its entirety, in light of its objective, and to harmonize its provisions in accordance with its intent and purpose.”² Another

¹ *Cahoon v. Hinckley Town Appeal Auth.*, 2012 UT App 94, ¶ 4, 276 P.3d 1141.

² *Clover v. Snowbird Ski Resort*, 808 P.2d 1037, 1045 (Utah 1991).

equally well recognized doctrine is that it is “assumed that each term [is] used advisedly,” that “the expression of one should be interpreted as the exclusion of another” and that omissions in statutory language are purposeful and should “be taken note of and given effect.”³ Likewise, where “statutory language lends itself to two alternative readings, [a court should] choose the reading that avoids absurd consequences.”⁴

Here, the City contends “same side of the street” includes all billboards that are located to the east of 300 West. This interpretation is consistent with the plain meaning of the term “same side of the street” and gives effect to the fact that the ordinance reads “on the same side of the street” not “on the same side *of the same street*.” An omission that must be deemed purposeful.⁵ Interpreting the spacing provision to apply to all billboards to the east of 300 West is also consistent with an expressly stated purpose of the billboard ordinance, which is to “promote the enhancement of the city’s gateways, views, vistas and related urban design elements of the city’s master plans.”⁶

Similarly, this interpretation does not render the words “same side of the street” superfluous, as Reagan erroneously contends. To the contrary, these words define the area to which the ordinance applies, whether that is to the north, south, east or west of the street at issue. Notably, Reagan does not provide any examples of how the ordinance could have been worded any differently to capture this meaning, despite claiming this could have been “easily” done.⁷

In contrast, Reagan contends the 300-foot spacing requirement is limited to billboards that are oriented north/south and have a 300 West street address, despite the absence of any such limiting language in the ordinance. This absence of any excepting language is especially notable because it stands in stark contrast to the language used for billboard spacing requirements set forth in Utah Code. Specifically, Utah Code section 72-7-505(3)(a) sets forth spacing requirements for billboards located along interstate and limited access highways.⁸ This provision expressly states the 500-foot spacing requirement does not apply to billboards “*on the same side of the interstate*

³ *Biddle v. Washington Terrace City*, 1999 UT 110, ¶ 14, 993 P.2d 875

⁴ *Utley v. Mill Man Steel, Inc.*, 2015 UT 75, ¶ 46, 357 P.3d 992.

⁵ *Marion Energy, Inc. v. KFJ Ranch P’ship*, 2011 UT 50, ¶ 14, 267 P.3d 863 (“We therefore seek to give effect to omissions in statutory language by presuming all omissions to be purposeful.”)

⁶ Salt Lake City Code § 21A-46-160.A.

⁷ A consideration of the issue reveals that there are extremely limited ways in which this spacing requirement can be conveyed. For example, the ordinance cannot read “shall not be located closer than three hundred (300) linear feet from any other small billboard . . . to the east of the street” because that would not capture circumstances where the street is oriented east/west, or the circumstances where the billboard is located to the west of the street. Similarly, streets not perfectly aligned on an east-west or north-south orientation would not be captured, i.e. streets that run southeast to northwest or northeast to southwest. Likewise, the ordinance cannot simply read within 300-feet of any other billboard, because that would not except billboards lying on the opposite side of the street, which is the exception the ordinance was clearly intended to allow. See Billboard Ordinance Amendments, § 21A.46.160.D.2.c.i & ii, which can be viewed here: <https://www.slc.gov/planning/2020/07/20/billboard-ordinance-amendments/>

⁸ Utah Code § 72-7-505(3)(a)

highway or limited access primary highway [if they] are not simultaneously visible.”⁹ The absence of a similar expressly stated exception in the City’s 300-foot spacing requirement must be understood as purposeful and given effect.

Reagan’s overly narrow reading of the 300-foot spacing requirement also gives rise to an absurd result that is wholly inconsistent with the ordinances stated purpose. Namely, it would permit clusters of billboards on corner lots, or along any one street, provided the billboard was offset on a small side street by some small margin, such that it could generate a different street address.

Finally, Reagan relies heavily on a decision from a California court, which is not binding in Utah, and is distinguishable in several important ways. Most notably, the ordinance at issue in the California case contained three additional important words, which are absent from the City’s ordinance. Its spacing requirement precluded billboards within 600 feet “on the same side *of the same street*.”¹⁰ In contrast, the City’s ordinance simply states “on the same side of the street,” omitting the additional “of the same” wording.¹¹ As previously stated, the omission of these additional words must be understood as purposeful and given effect.¹²

Another important distinguishing factor is that the ordinance at issue in the California case contained a separate spacing provision that specifically provided for the spacing of billboards at four-way intersections.¹³ It stated that “[n]o more than four off-site signs [could] be located at the intersection of two or more streets when such signs are located within 150 feet of the intersection of two street frontages.”¹⁴ The billboards at issue in the California case were located at an intersection and there was no dispute that they met the ordinance’s intersection spacing requirement.¹⁵ In contrast, the City’s ordinance does not have a separate provision regulating billboard spacing at the intersection of two streets. Again, an omission that must be understood as purposeful and given effect.¹⁶

Also important to the California Court’s decision was the fact that it was reviewing the decision of an appeal board that had resulted in a reversal of the City’s decision. The court noted the appeals board played no part in drafting the ordinance and had no special insight regarding how the ordinance was intended to be interpreted.¹⁷ In addition, two city employees, one that had been involved in the drafting of the ordinance, testified the city had a longstanding practice of not

⁹ Utah Code § 72-7-505(3)(a)

¹⁰ *Van Wagner Commc’ns, Inc. v. City of Los Angeles*, 84 Cal. App. 4th 499 (Cal. App. 2000).

¹¹ Salt Lake City Code § 21A.46.160.T.1.

¹² *See e.g. Marion Energy, Inc.*, 2011 UT 50, ¶ 14.

¹³ *Id.* at 504.

¹⁴ *Id.*

¹⁵ *Id.* at 510, n. 11.

¹⁶ *See e.g. Marion Energy, Inc.*, 2011 UT 50, ¶ 14.

¹⁷ *Id.* at 509.

applying the provision at issue to corner lots, noting the existence of the intersection spacing provision, which applied to such lots.¹⁸

In contrast, Reagan is appealing the City's decision that the application does not comply with the spacing provisions of its ordinance, not a decision by an appeal board. In addition, the decision was made by the zoning administrator who (unlike the appeal board in the California case) is delegated authority to interpret the meaning of provisions of Title 21A.¹⁹ Similarly, there is no evidence that the City has a longstanding practice of not applying the 300-foot spacing provision to corner lots or intersecting streets and the City's ordinance does not contain a separate provision governing the spacing of billboards in such circumstances. These important differences render the California case of little precedential value.

CONCLUSION

The City's decision that Reagan's application does not meet the spacing requirements of Salt Lake City Code § 21A-46-160.T.1. is consistent with the plain language of the ordinance and its stated purpose, gives effect to purposeful omissions, and avoids absurd results. The denial should be affirmed.

¹⁸ *Id.* at 504.

¹⁹ Salt Lake City Code § 21A-12.010.

Exhibit A



Building Services & Civil Enforcement
slcpermits.com

451 South State Street, Room # 215
Salt Lake City, Utah 84111
PO Box 145490
801-535-6000

Office Use Only

Updated 7/2019

BLD#: _____ Date: _____

Received by: _____

IBC approval: _____ Date: _____

Zoning approval: _____ Date: _____

Planning approval: _____ Date: _____

Billboard Construction Application

Property address: **1051 S. 300 W SLC, UT**

County tax parcel id #: **15 12 405 009 000** Zoning designation: **Commercial**

Project name: **Axiom 3rd West 30-Sheet**

Contact Information:

Name: **Nick Augustyn** E-mail: **Nick@reaganusa.com**

Address: **1775 Warm Springs Rd** Phone: **801-870-6726**

Property Owner Information:

Name: **Tiffany Provost** E-mail: _____

Address: **551 W 400 S. SLC, UT** Phone: **801-674-8880**

Billboard Owner's Bank and Account: **Reagan General Bank**

Contractor Information:

Name: **ROA** State Licence #: **252213-5551**

Sign Information:

Area of each face in sq. ft.: Face 1: **300** Face 2: **300** Total sq. ft.: **600**

Illuminated Electronic Billboard: Yes No

***PLEASE PROVIDE THE FOLLOWING INFORMATION WITH YOUR COMPLETED APPLICATION (ELECTRONICALLY AND ONLINE):**

A site plan, drawn to scale, which includes the following information:

- Property lines with dimensions;
- Footprint, location and setback of the proposed billboard;
- Footprint and location of all buildings, landscaping, parking facilities and/or other signs on the property;
- Location and dimension of all rights-of-way, alleys, streets and easements; and,
- Distance (spacing) to the nearest existing billboard on the same side of the street.

Elevations, drawn to scale, which include the height, width and length of the proposed billboard.

Structural Calculations, prepared by a Utah-licensed Structural Engineer.

Submittal and completion of a Structural Observations application: http://www.slcdocs.com/building/Structural_Observation_022015.pdf

Electrical Design, prepared by a Utah-licensed Electrical Engineer.

Submittal and completion of a Special Inspections application: http://www.slcdocs.com/building/Special_Inspection_11-13-14.pdf

Payment of the Billboard Permit Construction fee: \$259.00

Applicant's Signature:

Owner's Signature: _____

Typing of names in the signature fields is acknowledgment that this application has been completed correctly and agreement to be bound by its terms.

Permit approval requires that a footing, foundation and final inspection be conducted. Please call 801-535-6000 to schedule an inspection. Inspections may also be scheduled on-line at slcpermits.com.

All documents submitted by a design professional shall be sealed (date and signature across the seal).

Exhibit B

Joshua Peterman

Subject: FW: (EXTERNAL) RE: BLD2020-02189 letter - 1051 S 300 West

From: Paterson, Joel [<mailto:joel.paterson@slcgov.com>]

Sent: Friday, July 17, 2020 9:16 AM

To: Guy Larson; Victoria Lara

Cc: Norris, Nick; Robinson, Molly; Slark, Samantha; Nielson, Paul; Mikolash, Gregory; Hamilton, Kevin

Subject: RE: (EXTERNAL) RE: BLD2020-02189 letter - 1051 S 300 West

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Thank you,

JOEL PATERSON, AICP
Zoning Administrator

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