



# Staff Report

PLANNING DIVISION  
COMMUNITY & NEIGHBORHOODS

**To:** Salt Lake City Historic Landmark Commission  
**From:** Lex Traugher – Senior Planner  
(801) 535-6184 or lex.traugher@slcgov.com  
**Date:** April 20, 2017  
**Re:** Petition PLNHLC2016-00918, Demolition of the Residential Structure at 658 E. 600 South

## DEMOLITION OF A CONTRIBUTING STRUCTURE IN A LOCAL HISTORIC DISTRICT

**PROPERTY ADDRESS:** 658 E. 600 South  
**PARCEL ID:** 16-05-353-002  
**HISTORIC DISTRICT:** Central City Historic District  
**ZONING DISTRICTS:** FB-UN2 (Form Based Urban Neighborhood District) &  
H – Historic Preservation Overlay District  
**MASTER PLAN:** Central Community Master Plan – Medium and Low Residential/Mixed-Use

**REQUEST:** Trolley Square Ventures, LLC, is requesting approval from the City to demolish the residential structure on the subject parcel. The building is a contributing structure in the Central City Historic District.



**RECOMMENDATION:** It is Planning Staff's opinion that only two (2) of the seven (7) standards for demolition have been met, with the findings for Economic Hardship yet to be determined (Exhibit G). Therefore, staff recommends that the Historic Landmark Commission deny the request for demolition. If the applicant chooses to submit an application for Economic Hardship per City Code section 21A.34.020(K), they can do so at any time.

**BACKGROUND AND PROJECT DESCRIPTION:**

Trolley Square Ventures, LLC, is proposing to demolish the residential structure on the lot in order to construct a new mixed-use development (residential & commercial) on the subject and adjacent parcels. The applicant has submitted documentation to try to substantiate their demolition request and to show why demolition is warranted in this case. Please see Attachment E – Applicant Information for details.

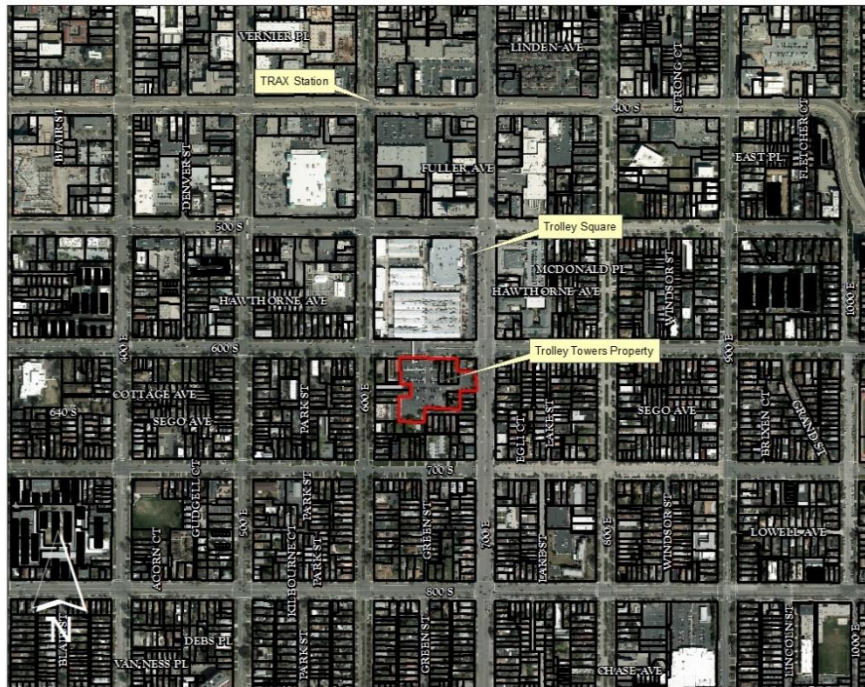
According to the most recent Central City survey completed in 2013, the residential structure on the property is rated “EC” or Eligible Contributing. This survey was conducted by an independent third party contractor who is/was qualified to conduct an inventory of historic resources for surveys of this nature and provide survey data to the City. The HLC reviewed the survey information, took public comment, and adopted the survey. Planning Staff’s analysis is in part based on the information in this survey.

This demolition application has been submitted in conjunction with an application for New Construction (Petition PLNHLC2016-00916). The application for New Construction is required as part of the demolition process and will also be reviewed by the HLC at a date in the future.

On January 17, 2017, the City Council rezoned the property to FB-UN2 (Form Based Urban Neighborhood District) in order to facilitate the redevelopment of the subject and surrounding properties for a mixed use development to include housing. The zone change however has no bearing on the demolition decision, other than the FB-UN2 allows for a wider variety of uses than the former zone RMF-45 (Moderate/High Density Multi-Family Residential District). A more detailed discussion of the rezone follows.

**CONTEXT – CENTRAL CITY HISTORIC DISTRICT**

**LOCATION MAP**



The subject property is located directly across the street from the Trolley Square shopping complex, a landmark site and arguably the most significant historic resource in this District. It is located on 600 South, a major east-west corridor in the City. It is also located adjacent to two (2) existing residential structures and to what is essentially vacant land; a parking lot that serves the Trolley Square complex. The Trolley TRAX station is located within in close proximity, two blocks to the north of the subject property.

The “Salt Lake City Community Preservation Plan” adopted on October 23, 2012, specifically addresses the Central City Historic District and provides a succinct description of this local historic district, of which the subject property is a part.

*The Central City Historic District was designated as a local historic district in 1991. Two blocks wide and nine blocks long, the district is occupied by one of the City’s oldest residential neighborhoods. While the northern edge of the district close to South Temple Street is occupied by larger homes and more upscale apartment buildings, the remainder holds modest brick cottages and bungalows that for many decades attracted working-class occupants. On its south end, the district abuts Liberty Park.*

*Both 500 East and 700 East are major north-south thoroughfares lined with both houses and commercial enterprises. A residential parkway is located along 600 East. Bisecting the district is 400 South, a primary east-west commercial and transportation corridor. Trolley Square, formerly the trolley barn for the Utah Electric & Railway Corporation, occupies an entire square block along 700 East. This facility has been converted into an indoor shopping center. While the district still contains numerous historic homes, it has experienced significant attrition of its historic building stock, particularly along its perimeters and major thoroughfares. The majority of these changes have taken place in the area between the north edge of the district and 500 South. The four square blocks between 300 South and 500 South have been so heavily impacted in recent decades by teardowns and modern commercial infill that they contain very little in the way of historic resources. Because of its central location in the City and its placement along several major transportation corridors, the district has been subjected to a substantial amount of historically insensitive commercial development in recent decades, resulting in a negative impact to its integrity. This has resulted in a historic district that has effectively been split in two, with a substantial loss of integrity of the northern blocks and greater integrity to the south (particularly south of 600 South).*

*The status of the district is now questionable and further attrition may merit its removal from historic district standing. Some may argue that it has already reached this point and that other controls are needed to protect the diminishing number of historic resources that remain there. One possible approach might be to consider boundary realignments that divide the district and create two new districts: Central City North and Central City South Historic Districts.*

While this brief description of the Central City Historic District does recognize significant issues and difficulties, it also indicates that the area in which the subject property is located, south of 600 South, does have greater integrity than the area to the north particularly between 300 and 500 South. This is demonstrated by the Location Map above where it can be seen that a significant transition begins to take place along 600 South from primarily commercial land uses to the north to residential land uses to the south. And while the particular block face on which this property is located has been negatively impacted with demolitions in the past (the area of the parking lot), there remain contributing historic resources along this block face and to the south on the same as well as adjacent blocks. Attached are the “Central City RLS – Results” maps that show the contributing structures along the block face of 600 South between 600 & 700 East (Attachment D). These maps also show the rating of all the other structures in the immediate vicinity as well.

#### **KEY ISSUES:**

**Issue 1 – Further Loss of Historic Resources:** The subject property is one of three properties proposed for demolition on 600 South. All three structures are contributing structures as previously noted. While it is evident that structures have been lost along this block face, the further deterioration of the block face that could occur with the demolition of three structures will be detrimental to the streetscape and to the Central City Historic District. While the subject structure nor the other two along 600 South proposed for demolition are architecturally significant, there are many examples of this type of architecture all over the City, the structures do tell the story of the district and contribute to the historic integrity and composition of the Central City neighborhood. The loss of said structures would diminish the number of historic resources that make up the district.

**Issue 2 – Integrity of the Building:** The subject building is in “Fair” condition, is inhabited, and while most likely in need of maintenance or repairs, the integrity of the building remains. The subject structure has been rated “EC – Eligible Contributing” in the Central City Reconnaissance Level Survey (2013). According to the Utah State Historic Preservation Office, a rating of “EC” means that the structure was built within the historic period (at least 50 years old) and retains integrity. It is considered a good example of an architectural style or building type, but may not be well preserved or has had substantial alterations or additions. The overall integrity has been retained and is eligible for the National Register as part of an historic district primarily for historic, rather than architectural, reasons.

The integrity of the subject building is the standard by which the proposed demolition is evaluated, as opposed to the fact that the building is simply in fair condition, most likely in need of maintenance or repairs.

**Issue 3 – Recent Rezone Implications:** As previously noted, the subject property was recently rezoned to implement the following policy in the Central Community Master Plan as amended:

*Identify zoning solutions for the block faces across from Trolley Square on 600 East and 600 South. The focus should be to encourage development on vacant parcels, increase residential density and promote the preservation and adaptive reuse of contributing structures. The surface parking lot south of Trolley Square should be rezoned to allow Trolley Square to building a parking structure, retain the historic structures fronting on 600 South and build housing.*

It is clear that redevelopment of vacant parcels at this location is a goal, but the preservation and adaptive reuse of contributing structures, specifically the historic structures fronting on 600 South, is also a goal. Both of these goals could be achieved. One goal does not take precedence over the other. In other words, while development of the area is important, it does not come at the expense of preservation efforts in terms of wholesale demolition.

**NEXT STEPS:**

If the Historic Landmark Commission finds that at least six (6) of the standards are met, the HLC shall approve the certificate of appropriateness for demolition. If the demolition request is approved by the HLC, the applicant would also need HLC approval for proposed New Construction in a Historic District in order to receive a COA for the demolition.

If the HLC finds that two (2) or less of the standards are met, the HLC shall deny the certificate of appropriateness for demolition. If the project is denied by the HLC, the applicant could choose to file an application for Economic Hardship.

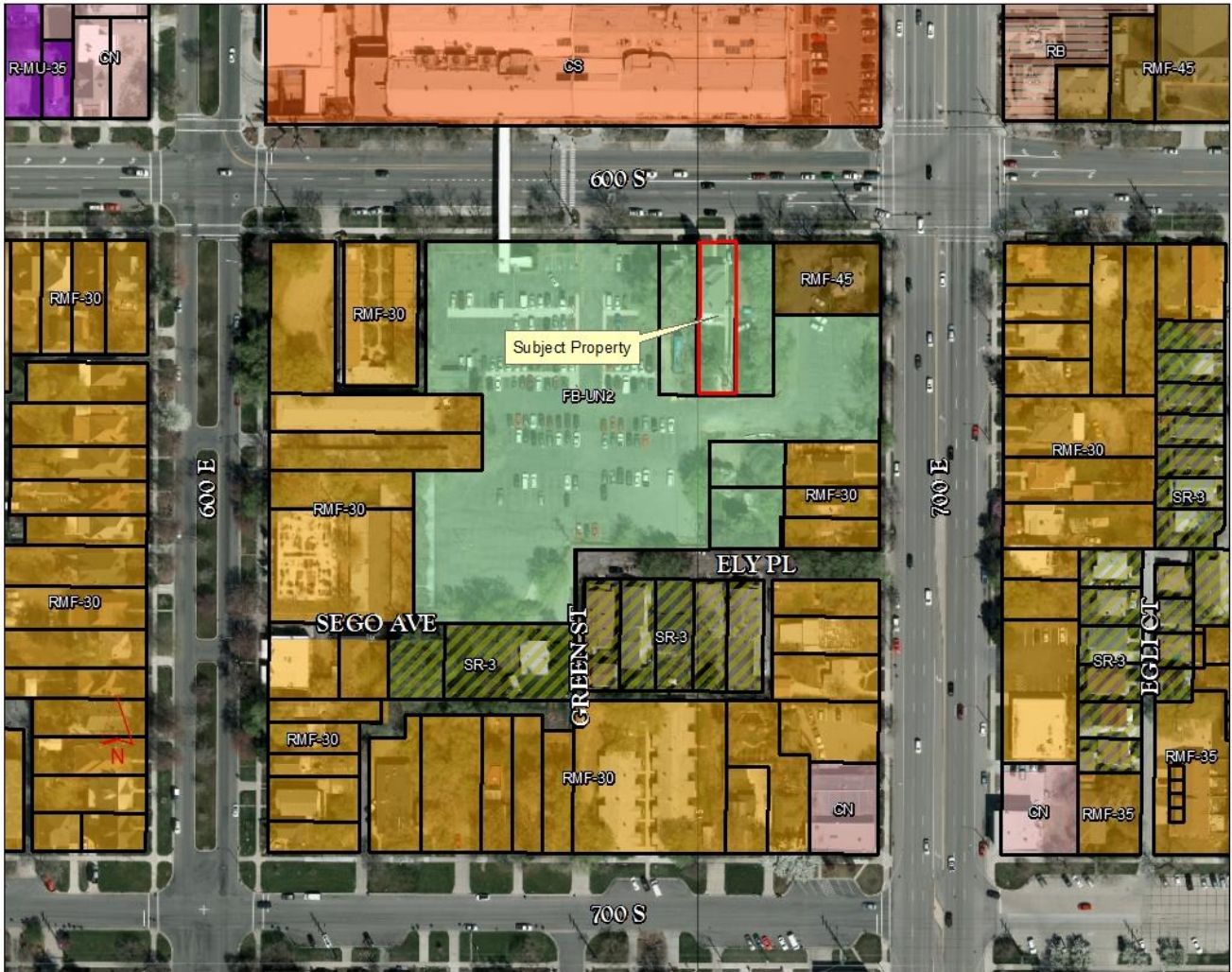
If the HLC finds that three (3) to five (5) of the standards are met, the HLC may defer a decision for up to one year during which time the applicant must conduct a bona fide effort to preserve the site, or the applicant could choose to file an application for Economic Hardship. If there is a finding of Economic Hardship, the applicant could demolish the structure without conducting a bona fide effort.

**ATTACHMENTS:**

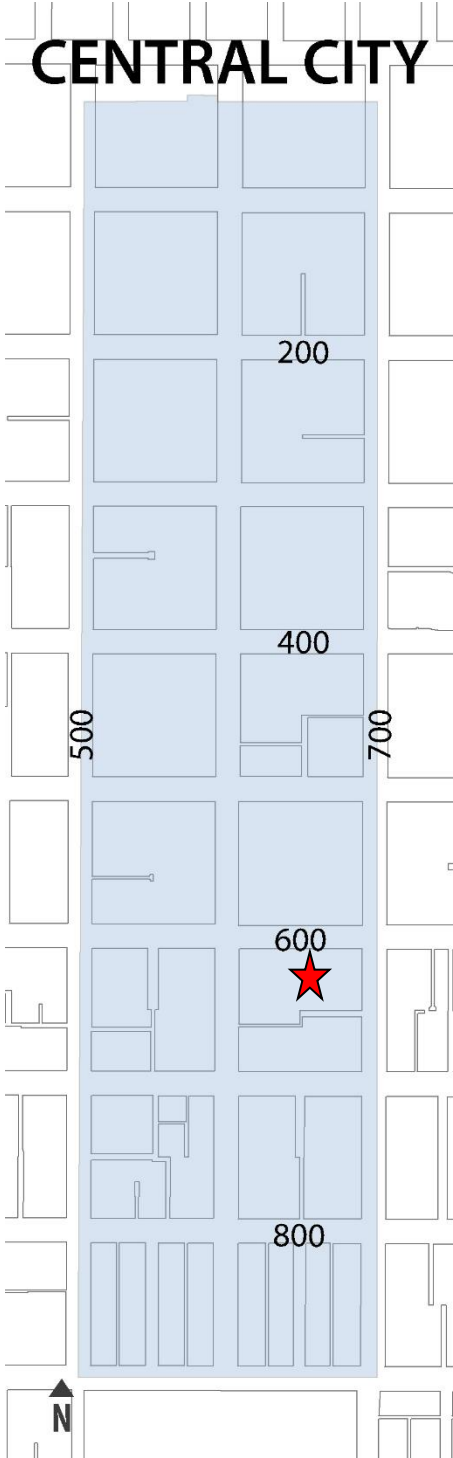
- A. Vicinity Map
- B. Historic District Map
- C. Survey Information
- D. Central City RLS – Results Maps
- E. Applicant Information
- F. Master Plan Discussion
- G. Analysis of Standards
- H. Public Process and Comments



# ATTACHMENT A: VICINITY MAP



**ATTACHMENT B: HISTORIC DISTRICT MAP**



**★ *Approximate Project Location***

# **ATTACHMENT C: SURVEY INFORMATION**

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652 E. 600 S.

EC

658 E. 600 S.

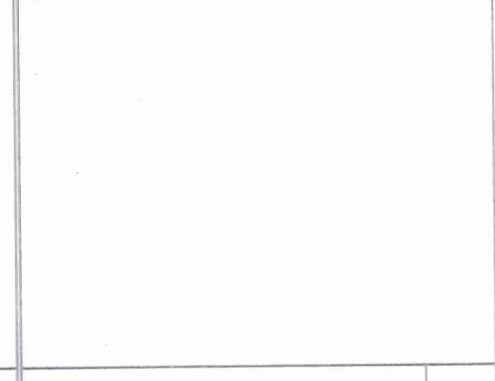
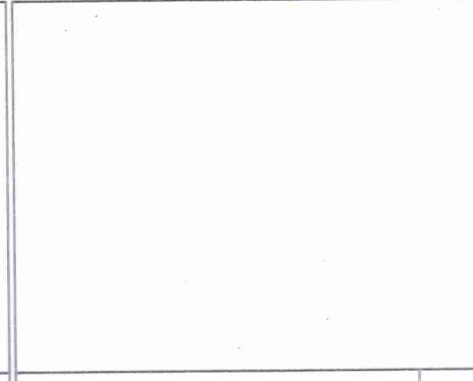
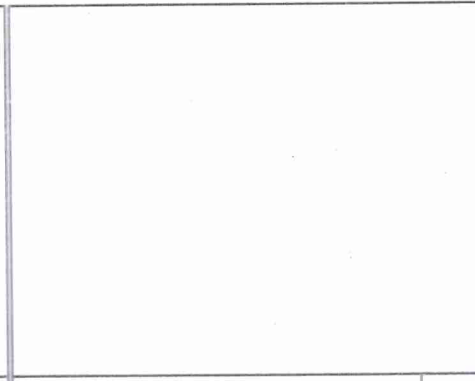
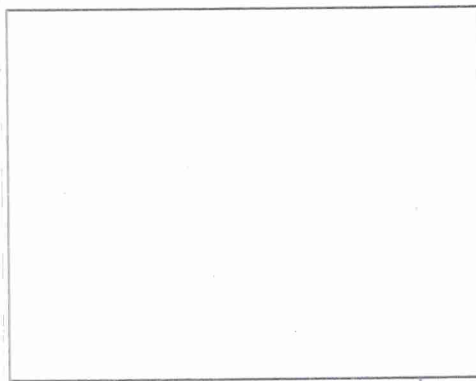
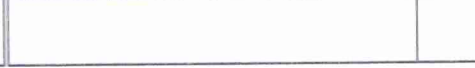
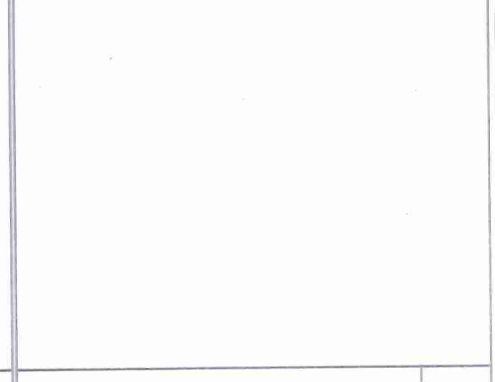
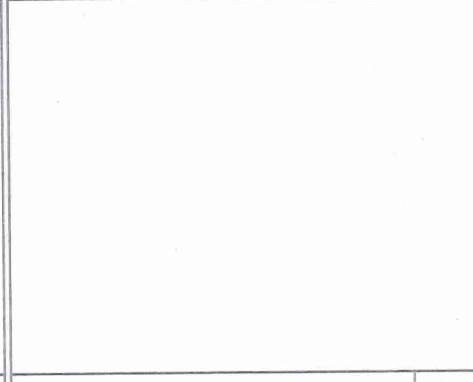
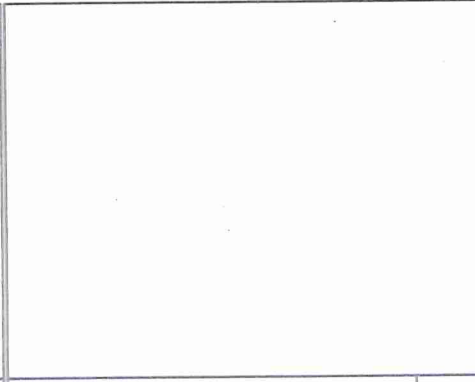
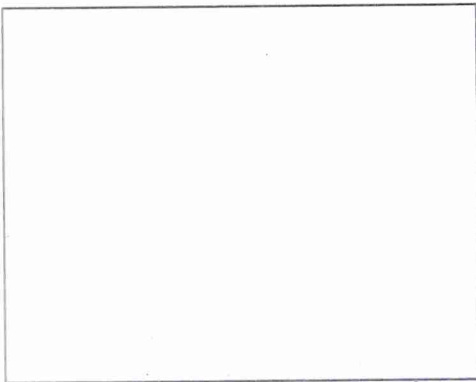
EC

664 E. 600 S.

EC

680 E. 600 S.

ES







**ATTACHMENT D: CENTRAL CITY RLS – RESULTS MAPS**



Figure 4. Location of buildings and eligibility ratings, Central City Historic District (Map 2 of 3).

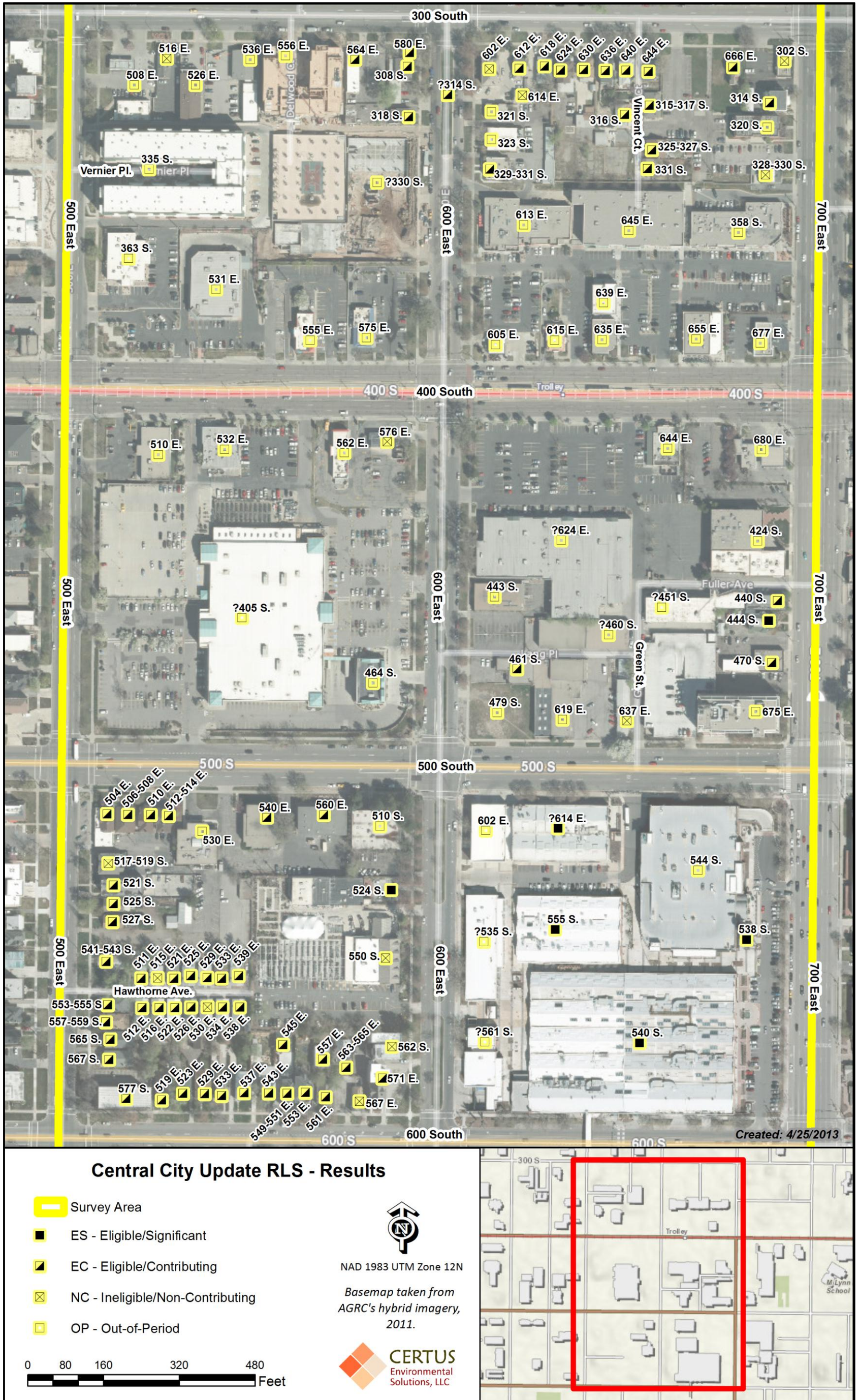
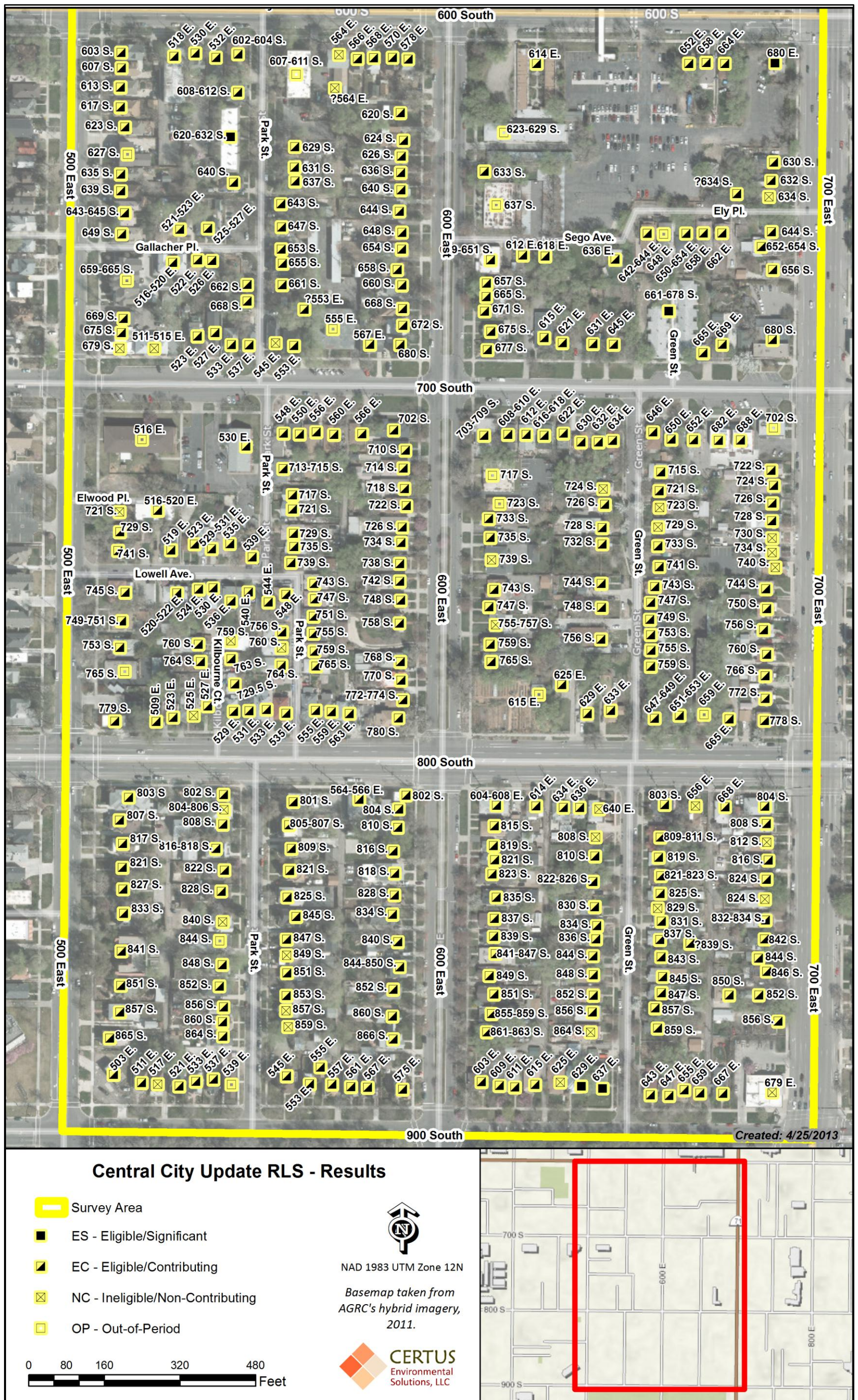




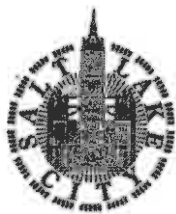
Figure 5. Location of buildings and eligibility ratings, Central City Historic District (Map 3 of 3).



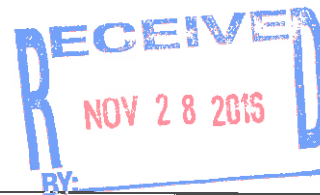


# **ATTACHMENT E: APPLICANT INFORMATION**

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# HP: Demolition



Demolition of Landmark Site       Demolition of Contributing Structure

OFFICE USE ONLY

Project #:	Received By:	Date Received:	Zoning:
PNHLC2016-00918	[Signature]	11/18/16	
Project Name: Trolley Square Development.			

PLEASE PROVIDE THE FOLLOWING INFORMATION

Request: DEMOLITION OF 658 E. 600 S., SLC, UTAH 84

Address of Subject Property: 658 E. 600 S., SLC, UTAH

Name of Applicant: Trolley Square Ventures, LLC	Phone: 801-819-3666
Address of Applicant: 630 E South Temple, SLC, UTAH	
E-mail of Applicant: hfwatty@gmail.com	Cell/Fax: 801-819-3666

Applicant's Interest in Subject Property:

Owner     Contractor     Architect     Other:

Name of Property Owner (if different from applicant):

E-mail of Property Owner:	Phone:
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➔ Planners are available for consultation prior to submitting this application. Please call (801) 535-7700 if you have any questions regarding the requirements of this application.

WHERE TO OBTAIN COMPLETE APPLICATION

<b>Mailing Address:</b> Planning Counter PO Box 145471 Salt Lake City, UT 84114	<b>In Person:</b> Planning Counter 451 South State Street, Room 215 Telephone: (801) 535-7700
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➔ Filing fee of \$485, plus additional cost of postage for mailing notice.

SIGNATURE

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

Signature of Owner or Agent: K. Semman H DFW	Date: 11-18-2016
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*SEE Exhibit A*

Staff Review

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- 1. Pre-submittal Meeting Recommended**  
 A pre-submittal meeting for all demolition requests involving historic landmarks and properties located within locally designated historic districts should be scheduled prior to submitting this application. To request a pre-submittal meeting please contact the Planning Counter either by email, [zoning@slcgov.com](mailto:zoning@slcgov.com), or by calling (801) 535-7700
- 2. Project Description** (please attach additional sheet)  
 Written description of your proposal with explanation of why the demolition is necessary
- 3. Show Integrity of the Structure**  
 Historic photographs of existing building(s)  
 (contact the Salt Lake County Archives at (385) 468-0820 for historic photographs)
- Current photographs of each side of the building. Interior photographs which help indicate the structural condition should be submitted as well
- 4. Show Streetscape Condition**  
 Photographs showing the streetscape and surrounding contributing and noncontributing structures
- 5. Show Threat to Public Health and Safety**  
 If the reason for the demolition is threat to Public Health and Safety, the building official will need to determine, in writing, that the building currently is an imminent hazard to public safety
- 6. Show No Willful Neglect**  
 Evidence of regular maintenance and repairs  
 Evidence of diligent soliciting and retaining tenants  
 Evidence that the structure was secure and boarded if vacant
- 7. Additional Applications/Bond**  
 Submit application for Economic Hardship if the demolition is required to rectify a condition of "economic hardship"  
 Submit application for New Construction for Postdemolition/Reuse Plan or Landscape Bond

➔ **Please note** that additional information may be required by the project planner to ensure adequate information is provided for staff analysis. All information required for staff analysis will be copied and made public, including professional architectural or engineering drawings, for the purposes of public review by any interested party.

**INCOMPLETE APPLICATIONS WILL NOT BE ACCEPTED**

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.

**STANDARDS FOR DEMOLITION OF A CONTRIBUTING STRUCTURE**  
(see Section 21A.34.020(1) of the Salt Lake City Zoning Ordinance)

1. The physical integrity of the site in terms of location, design, setting, materials, workmanship, feeling and association is no longer evident;
2. The streetscape within the context of the H historic preservation overlay district would not be negatively affected;
3. The demolition would not adversely affect the H historic preservation overlay district due to the surrounding noncontributing structures;
4. The base zoning of the site is incompatible with reuse of the structure;
5. The reuse plan is consistent with the standards for new construction (see Section 21A.34.020H);
6. The site has not suffered from willful neglect, as evidenced by the following:
  - a. Willful or negligent acts by the owner that deteriorates the structure,
  - b. Failure to perform normal maintenance and repairs,
  - c. Failure to diligently solicit and retain tenants, and
  - d. Failure to secure and board the structure if vacant; and
7. The denial of a certificate of appropriateness for demolition would cause an "economic hardship" (see Section 21A.34.020K).

**DETERMINATION OF COMPLIANCE WITH STANDARDS**  
(see Section 21A.34.020(2) of the Salt Lake City Zoning Ordinance)

1. Upon making findings that at least six (6) of the standards are met, the historic landmark commission shall approve the certificate of appropriateness for demolition.
2. Upon making findings that two (2) or less of the standards are met, the historic landmark commission shall deny the certificate of appropriateness for demolition.
3. Upon making findings that three (3) to five (5) of the standards are met, the historic landmark commission shall defer a decision for up to one year during which the applicant must conduct a bona fide effort to preserve the site.

**BONA FIDE PRESERVATION EFFORT**  
(see Section 21A.34.020(1) of the Salt Lake City Zoning Ordinance)

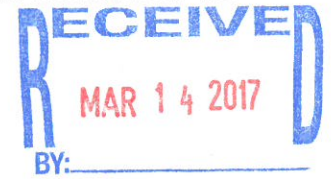
Upon the decision of the historic landmark commission to defer the decision of a certificate of appropriateness for demolition for up to one year, the applicant must undertake bona fide efforts to preserve the structure. The one year period shall begin only when the bona fide effort has commenced. A bona fide effort shall consist of all of the following actions:

1. Marketing the property for sale or lease;
2. Filing an application for alternative funding sources for preservation, such as federal or state preservation tax credits, Utah Heritage Foundation revolving fund loans, redevelopment agency loans, etc.;
3. Filing an application for alternative uses if available or feasible, such as conditional uses, special exceptions, etc.; and
4. Obtaining written statements from licensed building contractors or architects detailing the actual costs to rehabilitate the property.



Trolley Towers Project: Demolition Application Narrative (New information provided in addition to the narrative previously submitted with the original application) Revised 3-14-17.

Allen Roberts, FAIA  
CRSA



Page 2, Item 1: We have met with the City's planning and preservation staffs regarding these proposed demolitions, so we assume these will suffice for a "pre-submittal meeting."

## 2. Project Description

Trolley Square proposes to build a major, six-building, mixed-use complex on the site south of Trolley Square along 600 South between 600 E. and 700 E. It would include a hotel on the site now occupied by the three houses in question, plus apartment buildings, underground park beneath the entire site, and a parking structure, park and associated amenities. It is necessary to remove the three houses plus the long-vacant brick building behind 632 South 700 East in order to construct the underground parking and to build the hotel on the site occupied by the houses. The all-around value of the new project outweighs immensely the marginal value of retaining the four small dwellings, two of which have been vacant for more than three decades and are structurally damaged and deteriorated beyond economic repair.

Further Justification for the demolitions:

The 600 South streetscape no longer has its historic integrity. All of the buildings that appear on the 1898 Sanborn Map have been destroyed. Most of the buildings shown on the 1911 and 1950 Sanborn Maps also have been destroyed. These maps show that the streetscape historically had nine houses along it, plus the Caserio Apartments plus the eleven stone workers apartments built for Brigham Young. Another house at about 664 East had already been removed by 1911. Of this historic group, six of the houses and the stone workers apartments have been destroyed and the Caserio Apartments have been significantly altered, obliterating their original appearance. To put it more simply, of the 31 housing units that existed on this property historically, only three remain and they are surrounded by a sea of parking lot asphalt.

The two houses at 652/656 and 658 East are extant but in poor condition, especially the one at 652/656 E., unlivable and vacant for the last 34 years. Its northwest corner has settled, as evident by the huge masonry cracks and bricks fallen out of the north and west walls. Its interior is totally trashed. Because the roof has leaked for decades, the ceilings have fallen off the joists unto the floor. The wall plaster also has fallen off and the floors have buckled. The interior trim, including the fireplace mantel, has been stripped off. The interior now is simply piled with debris with every element is either missing or damaged beyond repair. It is also, by building code definition, a hazardous and dangerous building due to its asbestos, lead-based paint, mold and spores.

The third house, moved into the vacant lot at about 664 E. is a brick bungalow, supposedly built in 1923 and moved here from some other location in c. 1969-70. However, rather than sitting lower to the ground as it likely did originally, the bungalow was placed on top of a modern, 4-foot high, concrete foundation, fenestrated such that the basement could be used as an apartment. So, not only is this house not original to the street, it was moved in outside of the historic period and placed on a non-traditional foundation, causing it to lose its original character. In addition, this house is clearly not a contributing building as its architectural character and style are not consistent with that of the other houses on this half- block.

The fourth building is the one-story brick structure hidden from view behind the house at 632 East 700 S. The 1950 Sanborn says it was once a residence. It is surrounded by trees, fences and debris and appears to have been vacant for several decades. It too is in extremely poor physical condition. The structure suffers from major masonry cracks. Because the roof has leaked for decades, the interior is totally trashed and is dangerous and hazardous, similar to the interior of the "white house" at 652-656 E. 600 S. The "Dangerous Building Code" calls for this and the "white house" to be demolished.

These four buildings also are not "contributory" because they are no longer in their historical neighborhood context. As important, they have not been determined to be architecturally or historically significant. And, they are only weak examples of the many thousands of similar, better contributory houses built during the same period, in the same styles and extant throughout the city. Moreover, their housing units (two are occupied) will be more than replaced by the hundreds of units to be built in the project. In short, there is no significant preservation benefit to saving these houses in situ, or even if moved, especially when compared with the benefits of the proposed project and the fact that one can view hundreds of intact blocks of better examples of these house types nearby and citywide.

As a general concern, we do not agree with the City's apparent goal of preserving all of its many thousands of marginal, contributory buildings. If this policy is to remain in force, progress in many parts of the city will be halted or diminished, as it already has been recently for some meritorious project that have died due an unwillingness by the City to grant demolition permits.

Our strong preference, for the good of the future project, is to raze all four buildings in question. This makes the best sense, all things considered. If the City is unwilling to grant this request, however, we may be willing to move the best of the four houses, the red brick one at 568 E., to the southern part of lot facing Segoe Avenue or to a nearby lot in the neighborhood. This is a fitting location for the house as there are other, similar dwellings extant along this avenue. The other candidate for moving is the moved-in bungalow, although as we mention above, it is not really contributory and we should not be required

to move non-contributory buildings. In fact, as the study of these buildings by Prescott Muir Architects documents, none of the four buildings can be economically moved, placed on new foundations, be renovated, brought up to code and made livable. The cost to do so for any of them would exceed the return on investment, likely resulting in significant losses.

### 3. Integrity of Structures

Each of the four structures was built before 1911, excepting the c. 1923 bungalow later moved to the site. All four are built of non-reinforced construction. All of them are non-code-complying in many aspects. Two of them have been vacant for decades because they became unlivable. Each has been architecturally modified, especially in the rear where non-compatible additions have been built.

### 4. Streetscape Condition

See the accompanying 600 S. streetscape photo showing the three houses in context between vacant lots where their neighboring houses were razed to create parking lots. The 600 S. streetscape can be compared reasonably to a set of teeth in which all but a few teeth have been knocked out, causing a huge loss of dental and aesthetic integrity.

### 5. Threat to Public Health and Safety

First, the two long unoccupied houses are “attractive nuisances” legally and “dangerous buildings” according to the Dangerous Building Code. Although boarded up, they are subject to break-ins, vandalism, fire, and represent a potential gathering place for illicit activities. At least two of the houses are structurally unsound. All are subject to collapse in an earthquake due to their construction of non-reinforced masonry. All four have lead-based paint and asbestos and perhaps dangerous mold, spores and toxic chemicals.

### 6. No Willful Neglect

When Trolley Square owners obtained this property relatively recently, they were unaware that the houses were included in the purchase. They inherited the houses in the condition they are in now. They have boarded up the structurally unsafe houses. They have allowed the two occupied houses to remain occupied. The owners have not otherwise improved the two other houses because they are not economically restorable and the assumption has been that, for safety's sake, they will be razed and replaced with a project like the one being proposed herein.

### 7. Economic Hardship

Trolley Ventures had Prescott Muir Architects due an independent and objective evaluation of the four houses in question. After studying the conditions of the buildings and the building code requirements for moving them, reestablishing them on new foundations, removing all the hazardous materials, renovating them and bringing them up to full code compliance as if they were new buildings (as required by the code for moved buildings), the study concludes that a

significant amount of very costly work would have to be completed. The cost just to move the houses a short distance would be at least \$50,000 each and the house mover (Valgardson) refused to give a bid or propose to move the two structurally damaged houses.

Page 3, "Standards for Demolition of a Contributing Structure)

Owner's response to the 7 standards:

1. The physical integrity of the site and location have been compromised by the demolition of the neighboring houses, leaving these houses as a small "island" between incompatible parking lots. Their poor condition and some alterations to the houses also reduce their physical integrity.
2. As stated above, the streetscape integrity no longer exists given that the large majority of buildings on the street have been destroyed and the land converted to parking lots.
3. The "Historic preservation overlay district" would not be negatively affected because the streetscape is no longer intact and there are nearby many other intact streetscapes complete with all of their houses—ones equal to or superior to the marginally contributory houses left on 600 S.
4. Yes, the existence of these single-family houses is incompatible with the proposed new FBUN-2 zoning which calls for, encourages and anticipates large mixed-use and multi-family housing structures of the type proposed by our project.
5. Yes, the proposed project is consistent with the existing neighborhood master plan as well as the existing and proposed new zoning.
6. The four houses came in their present condition with the site purchase. See 6. Above. They have been owned by the present owners for only a short time, during which they have done nothing to diminish the condition of the structures. The two vacant and unsafe ones are logical candidates for demolition. The two occupied houses have been maintained, but again, one of them was brought to the site outside of the historic period.
7. Our information concludes that it is not economically feasible to move and restore these houses. To require us to do so would be to impose an unreasonable economic hardship.

An important related factor: The historic district in which these "contributory" dwellings exist was not professionally or properly created using the widely accepted industry standards for establishing the boundaries of historic districts (such as the National Park Service's "National Register of Historic Places Criteria for Eligibility," the National Trust for Historic Preservation's "Historic Districts," and the Trust's "A Guide to Delineating Edges of Historic Districts." Instead of creating a district which included only significant and landmark sites and intact streetscapes of contributory buildings, this district was made by simply drawing a rectangle around an older area of the city. It thus erroneously includes many non-historic buildings, modern streetscapes and streetscapes like the one on 600 South in which all but a few of the historic buildings have been razed. The half block in question never should have been included in the district and it should not be in the district now as it does not qualify under standard district evaluation criteria. Thus it is not appropriate that the City is requiring permission to demolish four



marginal, contextually isolated houses which should not be in a district or rated “contributory” due to that faulty district designation.

#### 8. Compatibility with Design Standards, Zoning and Text Amendment

The proposed Trolley Corners is compatible with the neighborhood, both past and present, in many ways.

a. Compatibility with Central City’s Historic Landmark Structures.

Central City features many historic, monumental landmarks ranging from government buildings to churches and schools to large commercial structures and mansions. Our proposed project will compatibly expand the Trolley Square campus of landmark-quality structures, continuing and contributing to the area’s landmarks tradition.

b. Compatibility with the Territorial Exposition Hall

Historically associated with the Trolley Square site was the massive, Victorian-styled Territorial Exposition, designed by State Capitol architect Richard K.A. Kletting and built in 1888. Sadly, it was razed after only 16 years to make way for the existing trolley barns. Our Buildings A and B, will face north towards the original site of the Exposition Hall. Architecturally, these two new buildings will pay respectful homage to the long-lost Exposition Hall by incorporating in their designs some of the visual elements of the monumental Hall, among them towers, masonry walls and round-arched windows.

c. Compatibility with Trolley Square

The proposed project will be an expansion of the historic Trolley Square campus, which includes the historic and new buildings on the square, Trolley Corners to the east and now Trolley Towers to the south of 600 South Street. The extant bridge connecting Trolley Square to south lot will remain and be connected to Building A. In addition, two other bridges will connect buildings A, B/C and E to allow visitors to park their cars underground and travel to these buildings safe from inclement weather or on-grade pedestrian-vehicular conflict.

Trolley Square’s Building D is massive and 420 feet long. It will face new Buildings A and B with facades of 95’ and 200’ wide respectively. The historic buildings and compatible new structures on Trolley Square range from 28 feet to 40 feet high (as per original 1910 architectural elevations) while the Trolley Water Tower is 125’ high (as per the enclosed tower elevation drawing). Some of the massive masonry chimneys reach 50’ high. The Whole Foods Building is 45’ tall. The Trolley Corners Building is about 40’ high. The office building immediately north of Trolley Square has six stories and is about 60’ tall.

Rather than achieving the desired monumentality through length and width alone, the new buildings at Trolley Towers would also achieve it through height. We propose the following heights:

Building A: 50' or less; 10' stepback on west façade after 30' high.

Building B: 60' or less, with two towers at 75'; 10' stepback on portion of north façade after 50.'

Building C: 50' or less. 42' to roof; up to 50' at top/tip of east and south triangular parapet walls; 10' stepback after 30' high along middle section of north facade.

Building D: 50' or less. 10' Stepbacks after 30' along south and west facades.

Building E: 50' or less on north façade and north portions of east and west facades. 10' stepback after 20' high on south façade, then up 20' to roof.

Building F: 30' or less.

These heights are consistent with other historic buildings in Central City and with the heights of the many 4-6 story apartment and condominium buildings being built throughout the neighborhood nearby.

#### 8. Tower Compatibility

Central City features several historic structures with towers, among them the City & County Building, Methodist, Presbyterian and Second Ward churches, plus the Trolley Square Water Tower and the corner tower on the (Stan Adams) Victorian house adjacent to this project. Many of the neighborhood's destroyed historic buildings also had towers, among them half a dozen churches, a few schools, the Salt Lake Brewery, several Victorian mansions and numerous commercial buildings.

The Territorial Exposition Hall once occupying the Trolley Square site featured two 100-foot-plus towers with octagonal top elements. The Victorian house on the corner of 700 E. and 600 E. also has an octagonal tower at its northeast corner. For further compatibility, we have octagonal elements on the tops of our towers. In summary, tall, monumental towers are an important character-defining architectural element in the neighborhood, with which our proposed towers are compatible.

#### 9. Compatibility with the Materiality and Colors of Trolley Square and the Neighborhood

We propose to use materials and colors similar to those found on the historic and more recent Trolley Square buildings and on the adjacent historic Victorian house extant on the southeast corner of 600 S. and 700 E. (the present Stan Adams home). Specifically, we suggest:

- a. Exterior walls of red-orange brick similar to that at Trolley Square.
- b. Lintels, arches, belt courses and related trim of light (French) gray synthetic stone or cast concrete similar to the arches over the large openings of the Trolley Square barns.
- c. Where roofs are pitched, standing-seam metal roofing with powder-coated, copper color finish.
- d. Windows and Doors: Metal or metal-clad wood windows with dark Victorian green color, powder-coated finish.

This palette of materials and colors is compatible with those found on the neighboring buildings mentioned above. Our proposed materials and colors are found on our Materials & Colors board.

#### 10. Compatibility with Zoning and Text Amendment

The recently proposed FBUN-2 Zone approved by the City Council was suggested by the City Staff for this project because of its compatibility with the nature and goals of the proposed project. The zoning (and neighborhood master plan) encourage and allow the mix of hotel, commercial/retail and residential buildings proposed. We have worked with the City Staff and Historic Landmarks Commission (HLC) to develop a design which substantially complies with the height, setback and stepback requirements of the zoning and the anticipated text amendment.

Specifically:

- a. Building A (facing 600 S.): 50' high or less; commercial/retail street level with apartments in floors above. Set back 15' from apartment building to the west (9' of right-of-way plus 6' of setback). West wall steps back 10' at 30' high level. Zero setback on front façade as allowed.
- b. Building B (facing 600 S.): 60' high or less; hotel and commercial/retail on main floor; two levels of hotel rooms above that; two levels of apartments above that. Zero setback on front façade and east wall (next to RMF-45-zoned lot) as allowed.
- c. Building C (facing 700 E.) 45' high or less; apartments all four levels; zero set back on east and north as allowed (next to RMF-45 lot), but voluntarily set back 10' at 30' foot high level, 25' north of 35' tall Victorian house/office building.
- d. Building D: (facing Sego Ave.) 50' high or less; Townhouses with a 10' stepback at 30' high facing Sego Ave. on south, apartments on all five levels north of the townhouses; set back 15' from the west and north property lines and as per the Text Amendment. The amendment allows for zero setback along a street (Sego Ave.) but since the property line is in the street, we have voluntarily set back the façade 20' to allow for a front yard buffer between the building and street.
- e. Building E (facing Ely Place): 50' or less high on the north (set back such that it is not visible from Ely Place dwellings); 20' high townhouses on the south, then set back 10' for the upper 2- story townhouses; zero setback is allowed along Ely Place but

we have set the south façade back 10' from the edge of the street and 5' back from the property line to provide a planting buffer. Also, there will be no car access or garages facing Ely or Segoe from Buildings D and E. 15' setback from the east property line as per the Text Amendment. Uses: two levels of parking to the north and townhouses to the south. Apartments above the upper parking level.

- f. Building F: (on southeast corner of 600 S. and 600 E. and not within the area rezoned): 30' height or less and setbacks as required in its RMF-30 zone.

Summary: As detailed above, the project is compliant with zoning in terms of building uses and is compliant for all but possibly Bldg. A, with respect to zoning and text amendments standards.

#### 11. Compliance with Maximum Parking Standard

Given the number of hotel and apartment units anticipated, plus the square footage of hotel and commercial/retail space anticipated, and applying the standard of 0.5 stalls for hotel rooms, 1 stall for 1-bedroom units, 2 stalls for 1-bedroom units, 3 stalls per 1,000 s.f. of commercial/retail space, etc., we would not be allowed more than 870-900 stalls on this site. As presently designed, the project has only 40 stalls on-grade, 150 stalls inside Bldg. E, 25 stalls inside Bldg. F and about 400 stalls in the one-level, underground parking structure, for project total of 615 stalls—well below the maximum number allowed.

Please feel free to contact Allen Roberts at CRSA with any questions or comments you may have about this narrative or the project.

Allen Roberts, FAIA

Tel: (801)-355-5915 (office); (801)-635-6918 (cell)

Email: allen@crsa-us.com

## EXHIBIT A

### Addresses of Subject Properties:

- Street Address: 652 East 600 South, Salt Lake City, UT  
Parcel Number: 16-05-353-001
- Street Address: 658 East 600 South, Salt Lake City, UT  
Parcel Number: 16-05-353-002
- Street Address: 664 East 600 South, Salt Lake City, UT  
Parcel Number: 16-05-353-003
- Street Address: 632 ~~East~~ 700 ~~South~~, Salt Lake City, UT  
Parcel Number: 16-05-353-014



1. We have met with the City's planning and preservation staffs regarding these proposed demolitions, so we assume these will suffice for a "pre-submittal meeting."

### 2. Project Description:

Trolley Square proposes to build a major, six-building, mixed-use complex on the old at grade parking lot south of Trolley Square along 600 South. The area consists of 3.75 Acre. The development would include a hotel on the site now occupied by the three houses in question, plus apartment buildings, underground parking beneath the entire site, a parking structure, and a park with associated amenities. It is necessary to remove the three houses plus the long-vacant brick building behind 632 South 700 East in order to construct the underground parking and to build the hotel on the site occupied by the houses. The all-around value of the new project outweighs immensely the marginal value of retaining the four (or possibly three, given one was moved in in c. 1970) contributory houses. This Development is consistent with the Central Community Master Plan.

### Further Justification for the requested demolitions:

The 600 South streetscape no longer has its historic integrity. The 1898 Sanborn map shows none of the buildings that exist now; see attached. The 1911 and 1950 Sanborn Maps show that the streetscape historically had nine houses along it, plus the Caserio Apartments plus the eleven stone worker's apartments built for Brigham Young. Another house at about 664 East had already been removed by 1911. Of this historic group, six of the houses and the stone workers apartments have been destroyed and the Caserio Apartments have been significantly altered, obliterating their original appearance.

The two houses at 652 East and 658 East are extant but in poor condition, especially the one at 652 East. The 652 East house is unlivable and has been vacant for decades, the northwest corner of the building has settled, as evident by the huge masonry cracks and bricks fallen out of the north wall. The third house, moved into the vacant lot at about 664 E. is a brick bungalow, supposedly built in 1923 and moved here from some other location in c. 1969-70. Rather than sitting lower to the ground as it likely did originally, the bungalow was placed



on top of a modern, 4-foot high, concrete foundation, fenestrated such that the basement could be used as an apartment. So, not only is this house not original to the street, it was moved in outside of the historic period and placed on a non-traditional foundation. This house is clearly not a contributing building. The fourth building is the one-story brick structure hidden from view behind the house at 632 East 700 S. The 1950 Sanborn says it was once a residence. It is surrounded by trees and fences and debris and appears to have been vacant for several decades. It too is in extremely poor physical condition and structurally unsound.

These four buildings are not truly any longer “contributory” because they are no longer in their historical neighborhood context and they are in poor to extremely poor condition. As important, they have not been determined to be architecturally or historically significant. At best, they are only very weak examples of the many thousands of similar, better contributory houses built during the same period and extant throughout the city. Moreover, these housing units (they are occupied) will be more than replaced by the many units to be built in the project. In short, there is no significant preservation benefit to saving these houses in situ, or even if moved, especially when compared with the benefits of the proposed project and the fact that one can view hundreds of intact blocks of better examples of these house types nearby and citywide.

As a general concern, we disagree with the City’s apparent goal of preserving all of its many thousands of even marginal, contributory buildings. If this policy is to remain in force, progress in many parts of the city will be halted or greatly diminished.

Our Site plan shows moving two houses to Ely Place, although we think only one at most is a legitimate candidate for relocation. Our strong preference, however, for the good of the future project, is to raze all four buildings in question. This makes the best sense, all things considered.

If the City is unwilling to grant this request, then we will consider moving the best of the four houses, the red brick one at 568 East, to the southern part of lot facing Ely Place. This is a fitting location for the house as there are other, similar dwellings extant along Ely Place. In fact, we believe that none of the four buildings can be economically moved, placed on new foundations, be renovated, brought up to code and made livable. The cost to do so for any of them would exceed the return on investment, resulting in significant losses.

### 3. Integrity of Structures:

Each of the four structures was built before 1911, excepting the c. 1923 bungalow later moved to the site. All four are built of non-reinforced construction. All of them are non-code-complying in many aspects. Two of them have been vacant for decades because they became unlivable.

#### 4. Streetscape Condition:

See the accompanying 600 S. streetscape photo showing the three houses in context between vacant lots where their neighboring houses were razed to create parking lots.

#### 5. Threat to Public Health and Safety:

First, the two long unoccupied houses are “attractive nuisances” legally and “dangerous buildings” according to the building code. Although boarded up, they are subject to break-ins, vandalism, fire, and represent a potential gathering place for illicit activities. Two of the houses are structurally unsound. All are subject to collapse in an earthquake. All four have lead-based paint and asbestos and perhaps dangerous mold, spores and toxic chemicals.

#### 6. No Willful Neglect:

When the owners purchased Trolley Square relatively recently, they were unaware that the four houses were included in the purchase. They inherited the houses in the condition they are in now. They have boarded up the structurally unsafe houses. They have allowed the two occupied houses to remain occupied. The owners have not otherwise improved the two other houses because they are not economically restorable and, for safety’s sake, they should be razed.

#### 7. Economic Hardship:

Demolition reports are included here in for each of the four houses. Hardship studies are currently being performed on the four houses pursuant to the Salt Lake City ordinance.

#### Page 3, “Standards for Demolition of a Contributing Structure”

#### Owner’s response to the 7 standards:

1. The physical integrity of the site and location have been compromised by the demolition of the neighboring houses, leaving these houses as a small “island” between incompatible parking lots. The poor condition and some alterations to the houses also reduce their physical integrity.
2. As stated above, the streetscape integrity no longer exists given that the large majority of buildings on the street have been destroyed and converted to parking lots.
3. The “H historic preservation overlay district” would not be negatively affected because the streetscape is no longer intact and there are nearby many other intact streetscapes complete with all of their houses—ones equal to or superior to the marginally contributory houses left on 600 S.
4. Yes, the existence of these single-family houses is incompatible with the proposed new FBUN-2 zoning which calls for and anticipates large mixed-use and multi-family housing structures of the type proposed by our project.
5. Yes, the proposed project is consistent with the existing neighborhood master plan as well as the existing and proposed new zoning.

6. The four houses came in their present condition with the site purchase. See 6. Above. They have been owned by the present owners for only a short time, during which they have done nothing to diminish the condition of the structures. The two vacant and unsafe ones are logical candidates for demolition. The two occupied houses have been maintained, but again, one of them was brought to the site outside of the historic period.
7. Our information concludes that it is not economically feasible to moved and restore these houses. To require us to do so would be to impose an unreasonable economic hardship.

650 E. 600 S.



NORTH

DSC\_0341.JPG



East

DSC\_0340.JPG





WEST

DSC\_0342.JPG



SOUTH

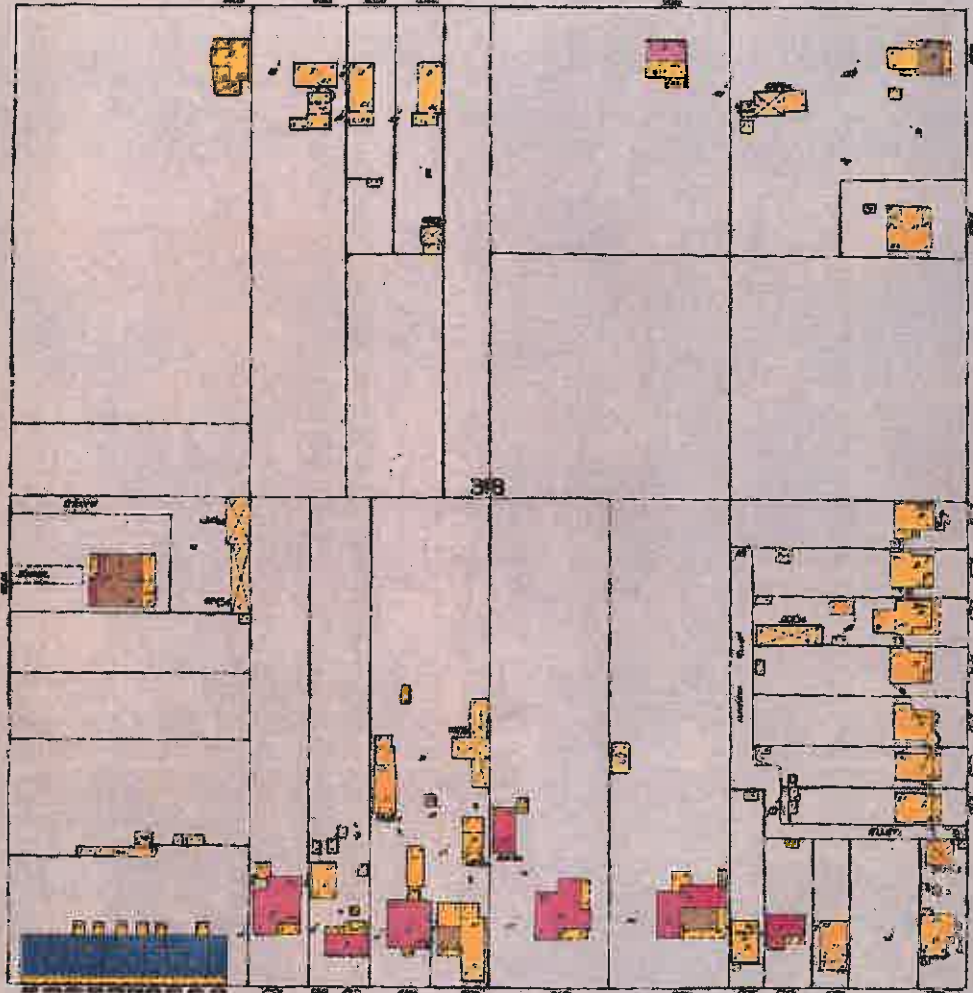
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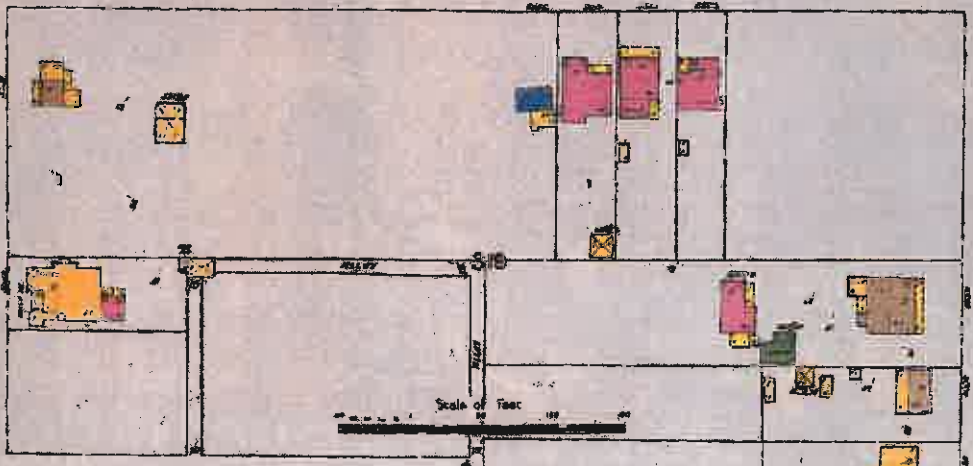
1898

181  
7TH EAST

168



6TH EAST



Scale of Feet

BELLEVUE PL.

© 2001 Mammoth Library, University of Utah

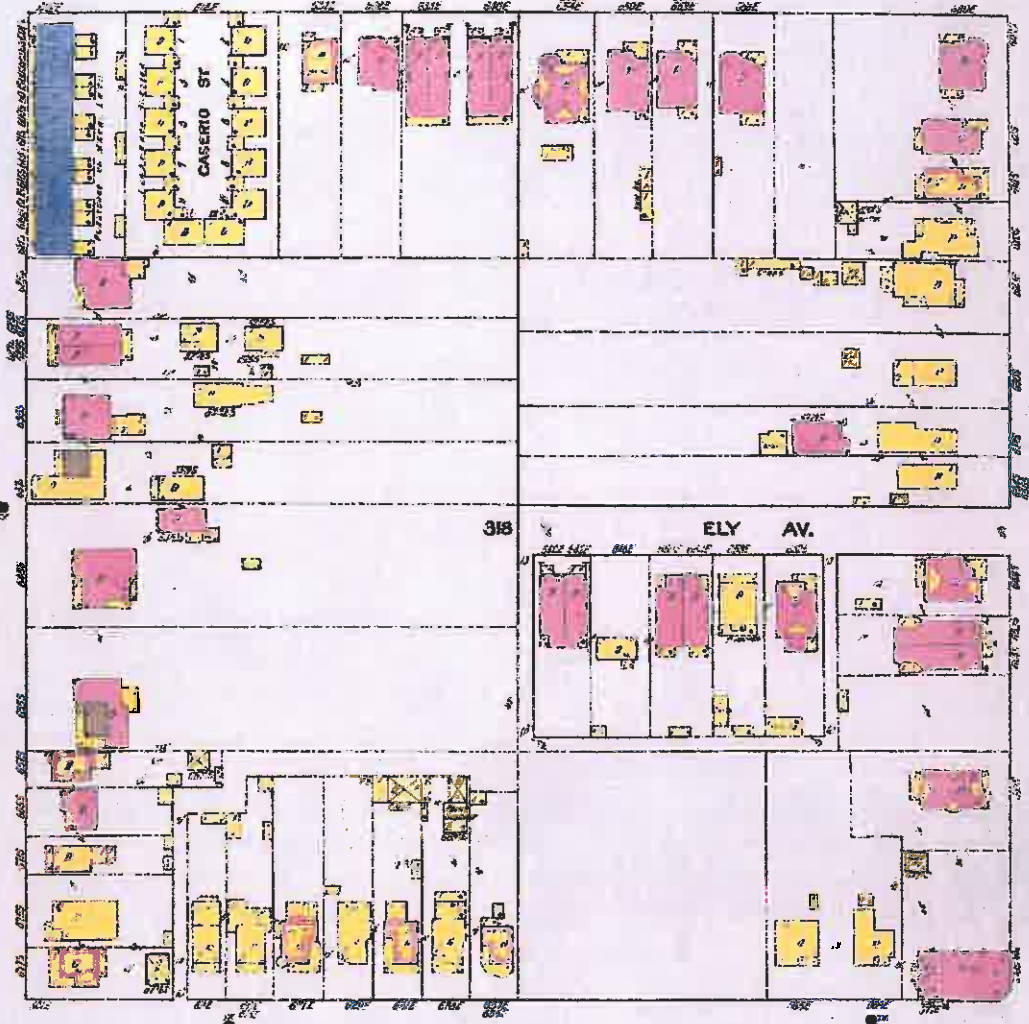
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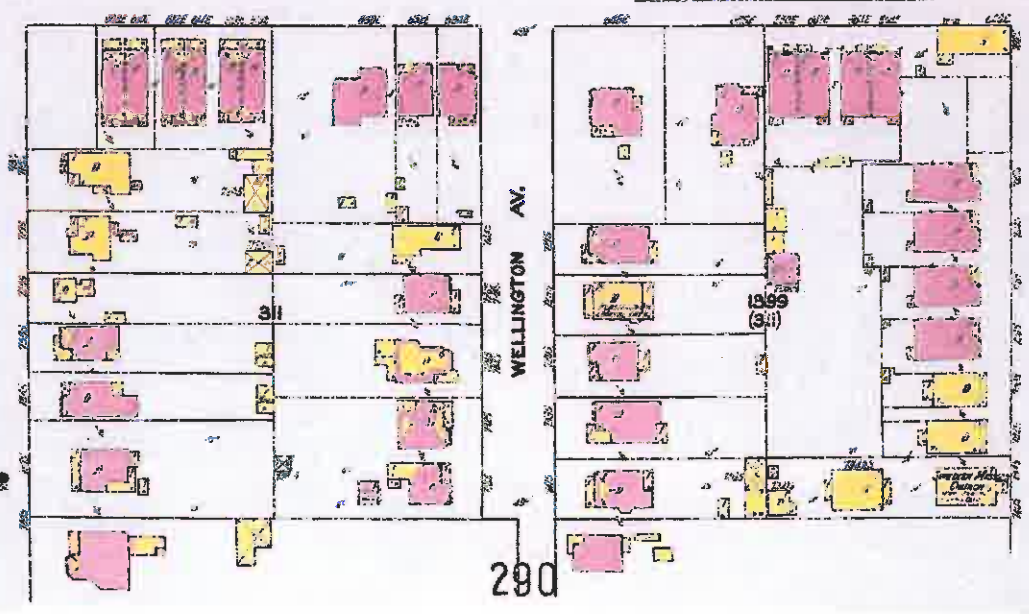
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6TH ST. E.

7TH ST. E.

7TH ST. S.

287



297

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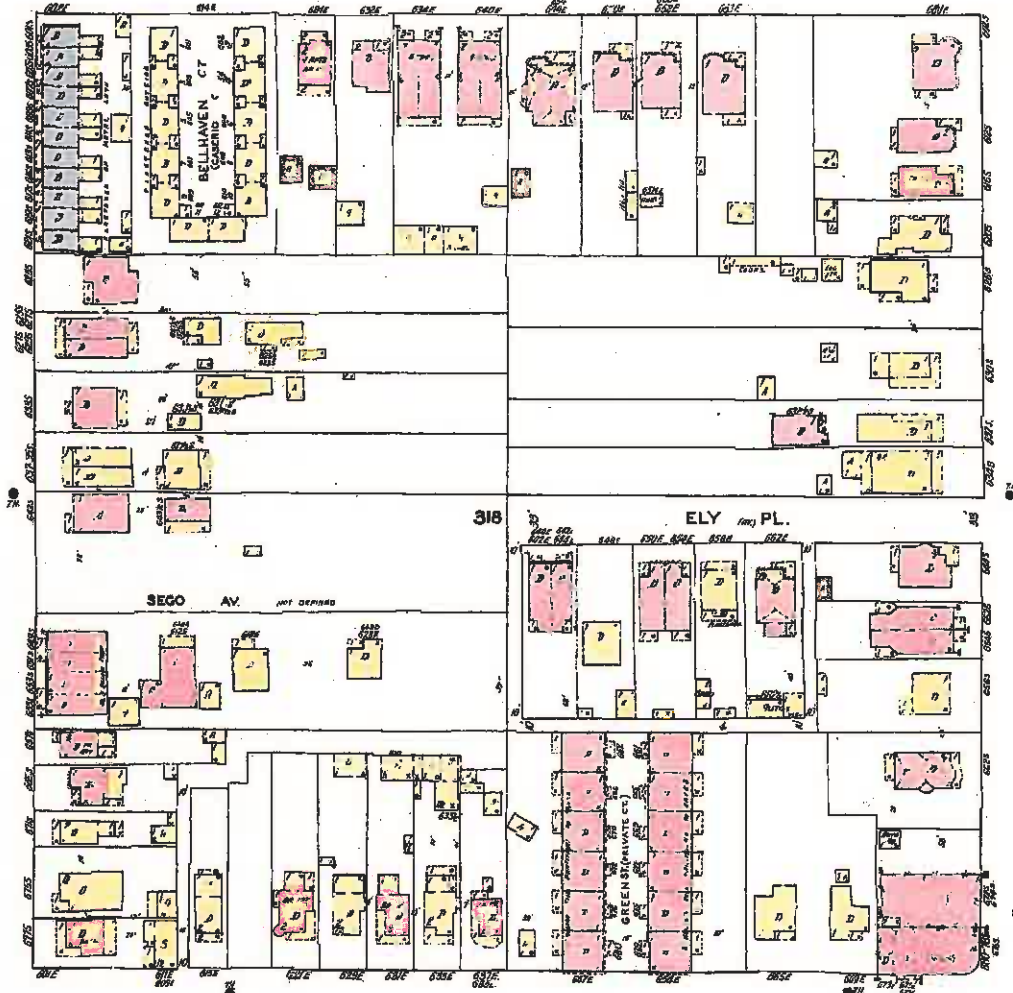
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1950

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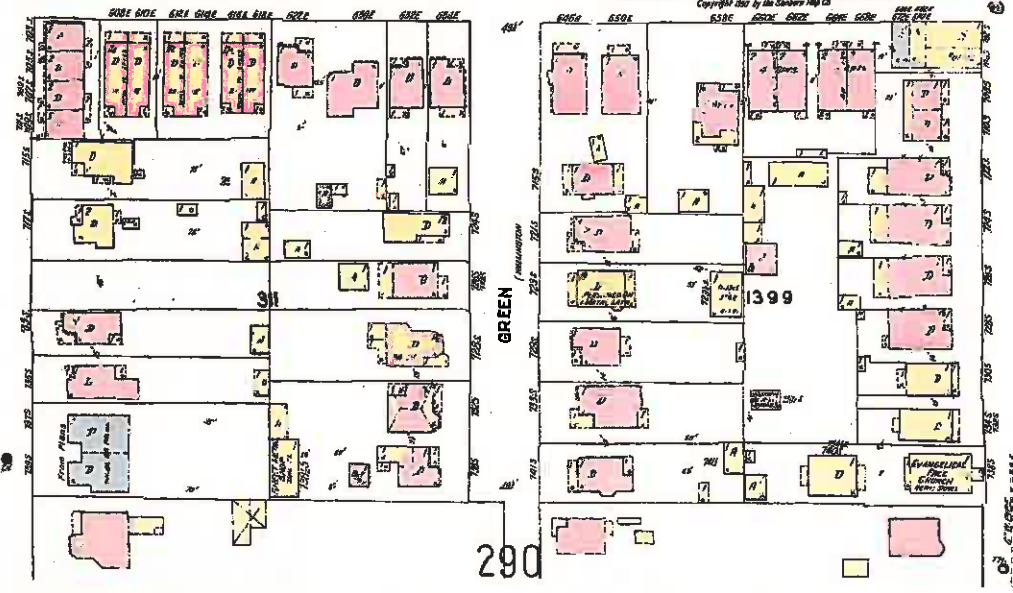
272  
6TH ST. S.



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291

7TH ST. S.



287

297

290

1591  
1490  
1490



## TROLLEY VENTURES' CASE FOR DEMOLITION TO FACILITATE BENEFICIAL NEIGHBORHOOD DEVELOPMENT

- 1) Two of the houses are severely structurally damaged and unmovable. Renovating them is infeasible and would create an economic hardship.
- 2) The same two houses have been vacant for decades, are deteriorated and unsafe; the "Dangerous Building Code" policy is to demolish them.
- 3) One of the houses is hidden behind trees and not publicly visible.
- 4) A third house is not original to the site. It was moved into the area and placed on a tall, incompatible concrete foundation.
- 5) The houses have lost their historic context as all the neighboring houses have been destroyed, leaving these few stranded on an island surrounded on four sides by paved parking.
- 6) That is, of the 31 dwelling units that existed on the property in 1952, only three (less than 10%) still exist. The other 90+% were razed long ago, destroying the architectural integrity of the streetscape.
- 7) Also, the neighboring Caserio/Bellhaven apartments have been severely altered and lost their original Spanish character and integrity.
- 8) This area (north 1/2 Block 318) does not qualify for inclusion in a historic district using the standard that 50% of the buildings should be either significant or contributory. Of the 62 housing units there in 1952, only six contributory buildings remain (again, less than 10%). This half block never should have been placed in the district.
- 9) We will replace the four houses with more than 300 new housing units, by far making up for the loss of housing stock.
- 10) There are several hundreds of better, similar houses on intact blocks in Central City and thousands of similar and better houses citywide. Thus the preservation effort would be better served focusing on those resources than on saving four marginal, out of context structures.
- 11) The new project will greatly benefit the neighborhood in creating jobs, new housing (including affordable housing), shopping, restaurants and a park/playground, while stimulating the area's economy, utility, beauty, landmark quality and reversing the site's unsafe conditions.

# MEMO

DATE: 11.18.16

**TO:** Douglas F. White  
3282 South Sunset Hollow Dr.  
Bountiful, Utah 84010

**FROM:** Jay Lems

**PROJECT:** Trolley Square Study

**RE:** Parcel 002 f

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## Application Requirements & Aids Completed and Attached:

- Site Plans at 1/16" = 1'-0"
- Elevations at 1/4" = 1'-0"
- Aerial photograph w/ photographic key
- Current photographs of each façade
- Photographs of adjacent properties and street frontages (at existing and proposed locations)
- Site plan showing location and rezoning of relocated parcels
- Structural report on existing structures w/ written and photographic documentation of existing conditions.

## Application Requirements Still Needed:

- From Owner: Completed Relocation Application
- Historic photographs of buildings, if required by Planning
- From Owner: Project summary memo from owner describing reuse of cleared lot and intended use of relocated structures.

## Subsequent Documents to be Produced Once All Documentation Above Has Been Compiled:


- From PMA: Executive Summary including summary of case for relocation, referencing the key elements of exhibits above.

## Attachments:

- Relocation Application
- Aerial photograph w/ photographic key
- Current photographs of each façade
- Photographs of adjacent properties and street frontages (at existing and proposed locations)
- Site Plans at 1/16" = 1'-0"

- Elevations at 1/4" = 1'-0"
- Site plan showing existing and relocated parcels and suggested Form Based Zoning
- Structural report on existing structures w/ written and photographic documentation of existing conditions.



50'  AERIAL VIEW < PHOTOS  
 CONTEXT PHOTOS  
 EXISTING LOCATION  
 658 EAST 600 SOUTH  
 RELOCATION APPLICATION  
 PRESCOTT MUIR ARCHITECTS

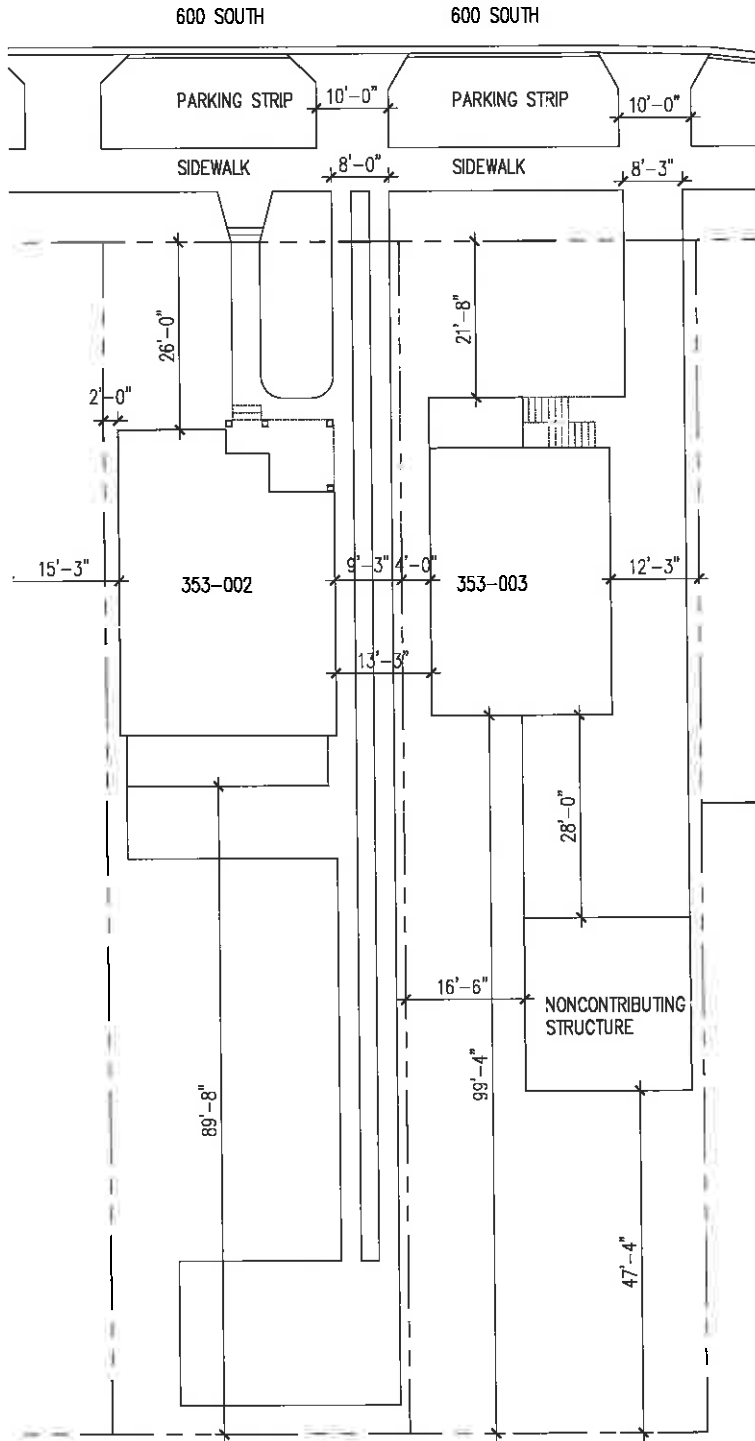






50'  
 AERIAL VIEW  
 CONTEXT PHOTOS  
 PROPOSED LOCATION  
 658 EAST 600 SOUTH  
 RELOCATION APPLICATION  
 PRESCOTT MUIR ARCHITECTS





A0.1

P.M.A.  
 171 WEST  
 PREPPOINT  
 SALT LAKE CITY  
 UTAH 84101  
 PH: 521-9111  
 FX: 521-9158

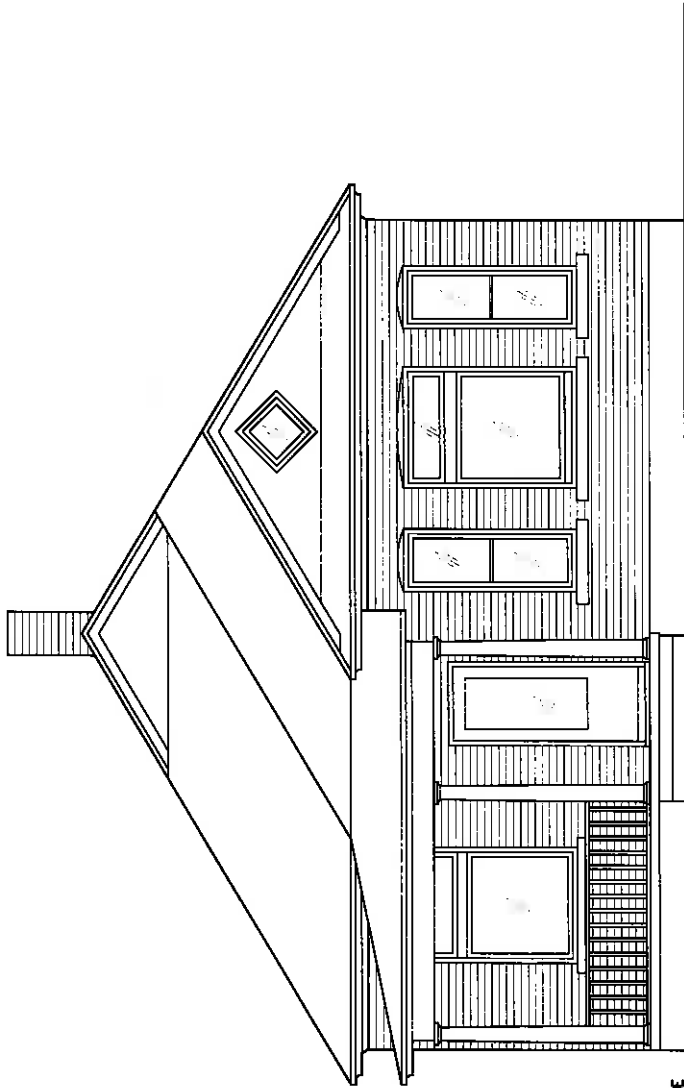
PRESCOTT MUIR  
 ARCHITECT

RELOCATED STRUCTURES  
 SITE PLAN  
 1/16" = 1'-0"

TROLLEY SQUARE RELOCATION APPLICATION

DATE: 11.18.16






 B/L SUFFIT  
 105'-7" APPROX.


 FINISH FLOOR  
 100'-0"


 GRADE & NORTH SIDE  
 98'-4" APPROX.

A2.2

P.M.A.  
 171 WEST  
 PIERPONT AVE.  
 SALT LAKE CITY  
 UTAH 84101  
 TEL: 521-9111  
 FAX: 521-9188

PARCEL 353-002 NORTH ELEVATION  
 1/4" = 1'-0"

TROLLEY SQUARE RELOCATION APPLICATION

DATE: 11.18.16

PRESOTT MUR  
 ARCHITECT



November 8, 2016

Mr. Jay Lems, AIA  
Prescott Muir Architects  
171 West Pierpont Avenue  
Salt Lake City, UT 84101

Re: Limited Structural Evaluation of Trolley Square Property 353-002  
658 E 600 S, SLC, UT  
ARW Project: 15426

Dear Jay:

At your request we have completed a limited structural evaluation and observation of the existing residential structure located at the address noted above. The purpose of the evaluation was to determine in a very cursory way the structural condition of the existing building. Neither advanced analysis techniques nor observation of existing structural elements by removing finished materials were performed as part of this limited visual evaluation. This evaluation only refers to structural elements, conditions and concerns. Architectural, Mechanical, Electrical or other important building factors are beyond the scope of this evaluation and report. The observation visit to the existing building was completed on October 24th, 2016 in your presence.

#### **Evaluation Process**

The limited structural evaluation was accomplished by the following: 1) A site observation of the existing conditions visually reviewing any visible structural conditions such as materials, structural element types, general sizes and limited observation of framing connections. The site observation did not include the removal of any finished material or surfaces to view obscured structural elements. 2) Using engineering experience from multiple previous building evaluations, reasoned assumptions regarding the existing building structural condition were made in order to provide "next step" recommendations to the owner. As noted above, the evaluation process was intended to be cursory and preliminary. Detailed investigations, modeling and analysis were not completed. Additional in-depth evaluation alternatives are available if deemed necessary by the owner.

#### **Building Description**

The residential home is located at the address noted above. The original building appears to have been constructed in 1904 based on information the owner obtained from the county assessor. The estimated building area is approximately 1146 square feet on the main floor. The building has a partially excavated

basement/crawl space. The structure is constructed of materials typical to construction at the time the building was completed, namely wood floor joists and roof joists supported by unreinforced stone or adobe walls with brick veneer.

The foundation system consists of rock foundation walls. It is unlikely that there are concrete footings beneath the rock foundation walls. Solid sawn wood timber posts are used to support the floor joist in the middle of the floor. The posts do not appear to be supported by any type of footing and are not adequately attached to the floor framing. The exterior walls of the building were constructed using unreinforced stone or adobe with a 4" brick veneer. The interior walls were covered with lath and plaster or gypboard. The main floor is also wood framed and covered with lath and plaster or gypboard. The roof framing consists of wood rafters.

### **Building Evaluation Results**

There was limited access to structural elements while conducting the visual observation. Observing and reviewing the walls, roof and floors seems to indicate that the structure has served well with no major noted structural problems, with exception to the roof joists and chimneys. The roof joists on the southern portion of the roof are visually sagging. Some of the framing members used to stick frame the roof appear to have permanent deflection. The unreinforced masonry chimney is too tall and narrow and does not meet required height to thickness ratios required by current codes. There does not seem to be any significant settling or movement in the exterior walls. The exterior rock foundation walls do not show signs of excessive settlement or cracking. A complete observation of the structural conditions of other various elements and connections was not observed due to building finishes and safety concerns.

The visual observation indicates that the 1900's home is constructed very similar to other buildings constructed in the same general time period. The perimeter walls are unreinforced stone or adobe and mortar walls with brick veneer. The floor and roof framing is supported by interior and exterior walls by methods that allow for the support and transfer of gravity (vertical) loads but not necessarily lateral and out-of-plane (seismic) forces. Additionally, straight and/or diagonally sheathed floors and roofs similar to those present in similar building structures of this era do not typically have adequate strength to transfer forces through the structure to the exterior walls. The unreinforced block walls will by necessity function as shear walls (elements to transfer lateral forces from the building to the ground). Due to the configuration of the walls without reinforcement, the walls may not perform as needed and could be a life safety issue in a seismic event. The lack of a strong positive tie of the roof and floor framing to the block walls may allow the walls to pull away from the floor and wall framing in a seismic event.

Experience indicates that structures such as this home can be seismically retrofitted and rehabilitated to resist some levels of seismic forces. Methods are available to upgrade walls, floor, roofs, etc. as well as connecting the structural elements together. Although a detailed evaluation and analysis of the building has not been completed, the level of rehabilitation and upgrade can be reasonably estimated in a preliminary way for planning and cost comparisons.



Levels of seismic upgrade vary. The minimum level that should be considered is "Life Safety". This level of building performance is aimed at providing a structure that in general allows occupants to exit the building without major injury or loss of life. The structure itself may not be usable or repairable after the event. An enhanced level of building performance is "Immediate Occupancy". This level of performance is intended to allow a building to be used soon after a major catastrophic event with minor non-structural repairs. For an existing building such as this older home, the cost difference between the two performance levels could be significant. We are confident that a "Life Safety" level of rehabilitation can be completed. An "Immediate Occupancy" level of upgrade may not be feasible due to costs and potential building functionality issues. It should be noted that any upgrade or remodel would include maintaining in place many structural elements that would not be deemed to meet current building code requirements for new construction.

Due to the nature of any significant structural upgrades, it is highly unlikely that the building can remain in use during upgrade construction work. It may be possible to phase the work to allow partial use, but this would be an issue to be coordinated with any other renovation, upgrade or construction work that may be desired or necessary by other trades.

Another structural consideration is the roof framing. There is already evidence of significant structural distress and it is common to have no insulation in the attic space. The existing roof framing is likely inadequate if analyzed based on current code required design snow loads. The existing structure has likely not experienced a design snow event because snow accumulations would melt rather quickly with a heated building and limited or no insulation.

### **Conclusions**

Based on the limited evaluation and observation completed for this residential structure, it is our opinion that the structure lacks the necessary strength and construction detailing to resist significant seismic (earthquake) or wind forces. It also appears to have an overstressed roof structure. The unreinforced brick chimney would need to be braced back to the roof structure. Solid sawn wood posts in the basement would require new footings and positive attachments to the floor beams. It is likely with proper evaluation, analysis, and design; the building can be rehabilitated to resist some specified level of seismic force. To rehabilitate this structure would require a significant tear down of existing roof elements in order to support gravity loads (code prescribed dead loads and roof snow loads) and resist some specified level of seismic force.

As the owner moves forward with considerations of future use, remodel, renovation, rehabilitation or tear down of this residential structure, more detailed evaluation and analysis methods are available and may be employed if additional detailed information is needed or desired during the decision making process.

The conclusions and recommendations in this report are only intended for the use of PMA and their current client. It should be understood that this investigation was not exhaustive and that information noted in this report is based on items that are currently visible. The condition and status of the items noted can and will change over time as the structure continues to deteriorate. As additional information becomes available, the conclusions and recommendations contained in this report may need to be re-evaluated and amended.

I would be happy to provide any additional assistance desired.

Sincerely,



McKay Barrish, SE

15426\_itr\_20161108



**1904 Residential Structure**



**Roof framing and un-reinforced brick chimney**



**Chimney requires bracing and the roof is sagging behind the chimney**



## **ATTACHMENT F: MASTER PLAN DISCUSSION**

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While a discussion of adopted master plan policies is relevant to the demolition request by providing background and contextual information, it is important to note that master plans are not relevant to the demolition standards, and the HLC cannot use the master plans as a finding of whether a demolition standard is satisfied or not. That said, the following are policies in various master plans that provide policy information related to the subject demolition request:

### **Plan Salt Lake (2015)**

- **Preservation Initiatives**– Preserve and enhance neighborhood and district character. Balance preservation with flexibility for change and growth (page 33, *Plan Salt Lake*).

### **Amendment to the Central Community Master Plan Policy (2012)**

The Central Community Master Plan identifies the subject property as part of the Trolley Station Area for its proximity to TRAX.

The Trolley Station is defined as an Urban Neighborhood Station Area. Urban Neighborhoods are places that have an established development pattern that contain a mix of uses and can support an increase in residential density and supporting commercial activities. New development generally occurs as infill, occurring on undeveloped or underutilized properties. A compact development pattern is desired in order to focus new growth at the station and respect the existing scale and intensity of the surrounding neighborhood. The highest residential density and intensity of commercial land use occurs closest to the transit station and are scaled down the further one moves from the station.

The station area is comprised of core and transition areas. The purpose of creating the different areas is to recognize the scale and nature of existing development patterns and identify the appropriate locations for growth. The general concept is that bigger buildings with the most dwelling units and a higher intensity level of commercial space should be located closest to the station in the core. The transition area reduces the scale, mass and intensity of new development as it moves away from the core area.

Trolley Station is a unique Transit Station Area because it is located within the Central City Historic District. The Central City Historic District is centered on the 600 East landscaped medians, which are a character defining feature of the historic district. The policy of the Trolley Station Area is to prohibit further dissection of the 600 East medians for vehicular traffic and to maintain the historical 15 foot landscaped setback of building along 600 East.

#### *Trolley Station Area Goal:*

Identify zoning solutions for the block faces across from Trolley Square on 600 East and 600 South. The focus should be to encourage development on vacant parcels, increase residential density and promote the preservation and adaptive reuse of contributing structures. The surface parking lot south of Trolley Square should be rezoned to allow Trolley Square to building a parking structure, retain the historic structures fronting on 600 South and build housing.

**Planning Staff Comment:** While this policy does indicate that development is desired on the vacant parcels, it also encourages the adaptive reuse of contributing structures and not the wholesale demolition of contributing structures in the endeavor to develop the area.

### **Salt Lake City Community Preservation Plan (2012)**

Policy 3.3g: Ensure that underlying zoning is supportive of preservation policies for the area in which historic or character preservation is proposed. (Page III-26)

Policy 3.3k: Support modification of existing historic resources to allow for changes in use that will encourage the use of the structure for housing or other appropriate uses in historic districts in an effort to ensure preservation of the structure.

**Planning Staff Comment:** These two policies are related to the recent rezoning of the subject parcels from single & multifamily residential use zones to the FB-UN2 zone. The FB-UN2 zone allows for a wider variety of uses, to include commercial uses, than the previous residential zones and therefore greater opportunity for adaptive reuse of the subject structure.

Policy 3.3m: Ensure criteria for demolition of contributing structures are adequate to preserve historic structures that contribute to the overall historic district while allowing for consideration of other important adopted City policies.

Action 1: As part of the revisions to the demolition of contributing structure criteria, evaluate the appropriateness of including criteria that allows the consideration of whether the demolition would allow the advancement of other important adopted City policies to be part of the analysis.

Consideration of other adopted policies should not be weighted more heavily than the adopted preservation policies. The level of importance of the other adopted policies in the demolition analysis should be based on how relevant the contributing structure is to the overall historic district and the significance of the location of the contributing structure to the implementation of the other applicable adopted City policies.

**Planning Staff Comment:** This policy indicates that other City policies, including but not limited to housing and economic development, should not be more heavily weighted than adopted preservation policies.

# **ATTACHMENT G: HISTORIC PRESERVATION STANDARDS**

## **21A.34.020: H HISTORIC PRESERVATION OVERLAY DISTRICT:**

A. Purpose Statement: In order to contribute to the welfare, prosperity and education of the people of Salt Lake City, the purpose of the H - Historic Preservation Overlay District is to:

1. Provide the means to protect and preserve areas of the city and individual structures and sites having historic, architectural or cultural significance;
2. Encourage new development, redevelopment and the subdivision of lots in historic districts that is compatible with the character of existing development of historic districts or individual landmarks;
3. Abate the destruction and demolition of historic structures;
4. Implement adopted plans of the city related to historic preservation;
5. Foster civic pride in the history of Salt Lake City;
6. Protect and enhance the attraction of the city's historic landmarks and districts for tourists and visitors;
7. Foster economic development consistent with historic preservation; and
8. Encourage social, economic and environmental sustainability.

**L. Standards for Certificate of Appropriateness for Demolition of a Contributing Structure in an H Historic Preservation Overlay District:** In considering an application for a certificate of appropriateness for demolition of a contributing structure, the Historic Landmark Commission shall determine whether the project substantially complies with the following standards:

### 1. Standards for Approval of a Certificate of Appropriateness for Demolition:

Standard	Finding	Rationale
<p><b>The physical integrity of the site as defined in subsection C15b of this section is no longer evident. Subsection C15b reads, “Physical integrity in terms of location, design, setting, materials, workmanship, feeling and association as defined by the National Park Service for the National Register of Historic Places.”</b></p>	<p>Does not comply.</p>	<p>The physical integrity of the subject site and structure is very evident in terms of location, design, setting, and materials. The 2013 Central City survey rates the subject building as “EC” or an Eligible Contributing structure. This is indication that the physical integrity of the site and structure is still intact, and contributes to the historic fabric that makes up the Central City Historic District.</p>
<p><b>The streetscape within the context of the H historic preservation overlay district would not be negatively affected</b></p>	<p>Does not comply.</p>	<p>The demolition of the subject building would have a further negative impact on the streetscape beyond the detrimental impacts that have already occurred along this block face with the surface parking lot creating “missing teeth.” Any demolition of structures along this block face will have a detrimental impact on the block face and the Central City Historic District as a whole. Further demolition will certainly not be an enhancement or have a positive impact on the block face or the overlay district. While this block face certainly has been altered, several structures have been demolished, and the surface parking lot is a large gap in the consistency in the existing development on the block, the further reduction of contributing structures is not warranted based on past actions of demolition.</p>

<b>The demolition would not adversely affect the H historic preservation overlay district due to the surrounding noncontributing structures</b>	Does not comply.	Surrounding structures along this block face are all contributing structures to the district. There are no non-contributing structures along this block face. Any demolition of structures along this block face would adversely affect the H – Historic Preservation Overlay District.
<b>The base zoning of the site is incompatible with reuse of the structure</b>	Does not comply.	As noted previously, the City Council recently rezoned the subject site from RMF-45 (Mod/High Density Multi-Family Residential District) to FB-UN2 (Form Based Urban Neighborhood District). The RMF-45 zone is a multifamily residential zone that would not allow any commercial development. The FB-UN2 zone allows for mixed-use, residential and commercial development. The FB-UN2 zone actually allows more options for land uses, and subsequently development of the subject property, than the former RMF-45 zone, therefore the base zoning of the subject site is very compatible and actually promotes the adaptive reuse of the structure on the site by allowing a wider variety of uses.
<b>The reuse plan is consistent with the standards outlined in subsection H of this section</b>	Complies - Conceptually, it appears that the reuse plan can meet the standards for new construction in an historic district.	The reuse plan will be a mixed-use (residential and commercial) project. The applicant has submitted an application for New Construction (PLNHLC2016-00916). The HLC will be tasked with making a final decision regarding the proposed new construction at a later date.
<b>The site has not suffered from willful neglect, as evidenced by the following:</b>  <b>(1) Willful or negligent acts by the owner that deteriorates the structure,</b>  <b>(2) Failure to perform normal maintenance and repairs,</b>  <b>(3) Failure to diligently solicit and retain tenants, and</b>  <b>(4) Failure to secure and board the structure if vacant</b>	Complies.	It is uncertain if the current owner has willfully or negligently acted in a manner that has caused further deterioration of the subject structure. The applicant has provided no evidence that the current owner has done any maintenance or repairs. The structure is inhabited at this time and is in “Fair” condition. Maintenance, rehabilitation, and replacement may be needed on many items of the structure.
<b>The denial of a certificate of appropriateness for demolition would cause an "economic hardship" as defined and determined pursuant to the provisions of subsection K of this section</b>	To be determined.	If the request for a Certificate of Appropriateness for the demolition of the subject site is denied, the applicant can pursue a determination of economic hardship as outlined in subsection K. This would be a process that the applicant could pursue once a decision is made regarding the proposed demolition.

2. Historic Landmark Commission Determination of Compliance with Standards of Approval: The Historic Landmark Commission shall make a decision based upon compliance with the requisite number of standards as set forth below.

a. Approval of Certificate of Appropriateness for Demolition: Upon making findings that at least six (6) of the standards are met, the HLC shall approve the Certificate of Appropriateness for demolition.

b. Denial of Certificate of Appropriateness for Demolition: Upon making findings that two (2) or less of the standards are met, the HLC shall deny the Certificate of Appropriateness for demolition.



c. Deferral of Decision for Up To One Year: Upon making findings that three (3) to five (5) of the standards are met, the HLC shall defer a decision for up to one year during which the applicant must conduct a bona fide effort to preserve the site pursuant to subsection 21A.34.020M of the Salt Lake City Zoning Ordinance.

## **ATTACHMENT H: PUBLIC PROCESS AND COMMENTS**

### **Work Session:**

On December 8, 2016, a work session was held with the HLC. The HLC reviewed conceptual plans that had been submitted to the Planning Division for review. While there was a lengthy discussion of the application for new construction, the demolition requests were not discussed.

### **Open House:**

Following the work session held on December 8, 2016, an open house was held on December 9, 2016. Nine members of the public attended this session. General questions regarding the overall proposal were entertained by the applicant and Planning Staff.

### **Recognized Organizations (Community Councils):**

The Central City Neighborhood Council and the East Central Community Council were formally contacted via email on February 13, 2017, to solicit comment regarding the demolition and new construction proposals. Neither Community Council requested a presentation by the applicant at one of their meetings. No written comments were received as of the preparation and distribution of this staff report.

### **Open House:**

A second open house was held on March 16, 2017. Eight members of the public attended this session. Again, general questions regarding the overall proposal were entertained by the applicant and Planning Staff.

### **Public Comments:**

As of the preparation of this staff report, three (3) written comment documents relating to the proposed demolition(s) have been received by Planning Staff. These documents are included for review.

### **Notice of the public hearing for the proposal include:**

- Notice mailed on April 6, 2017.
- Agenda posted on the Planning Division and Utah Public Meeting Notice websites on April 6, 2017.
- Property posted on April 6, 2017.

## Traughber, Lex

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**From:** cindy cromer  
**Sent:** Thursday, December 15, 2016 3:36 PM  
**To:** Traughber, Lex  
**Cc:** Oktay, Michaela; Norris, Nick; Tarbet, Nick  
**Subject:** open house for TSV-proposed demolitions

Lex-Please address the following points in your staff report regarding the proposed demolitions associated with Trolley's Square's application. I will have additional comments after reviewing the details in the economic hardship provisions. It has been a few years since I've read them.

1. The owner has said repeatedly in public hearings that he didn't know that the houses were included when he purchased the property. He made this statement most recently at the hearing before the City Council on December 13, 2016. I assume that he has attached some values to the structures so that they can be depreciated, but his cost basis is very small or near zero by all reasonable standards. This low cost basis will certainly affect any arguments about economic hardship. He owns structures which need reinvestment but he essentially acquired them at no cost. In fact, he has said that he didn't even know that he had acquired them when he purchased Trolley Square.
2. The Central Community Master Plan (2005) states in HP-4.1 that the City should encourage developers to work with the State archaeologist to identify and survey sites with potential archaeological resources. Landmarks Commissioner Quist has already suggested that the site at the corner of 600 E and 600 S may contain archaeological resources. Because of the early development of the area, the entire site may contain archaeological resources. It is especially likely that such resources were ignored during the construction of the surface parking lot.
3. The Central Community Master Plan contains numerous other statements directly relevant to the proposed demolitions:

from Historic Preservation Goals, p. 18

*The most significant feature of this district is its overall scale and simple character of buildings as a group, as a part of the streetscape. As a result, the primary goal is to preserve the general, modest character of each block as a whole, as seen from the street. Because the overall street character is the greatest concern, more flexibility in other areas, particularly renovation details should be allowed.*

Note the emphasis on the structures as a group, the streetscape, and the block as a whole. This emphasis in the Master Plan is not consistent with statement by the developer's architect before HLC on 12/8/16, "The lower half of the block is not relevant to this discussion" and "We're not dealing with the lower half of the block. "

*from the Livable Communities project (2012), an amendment to the Central Community Plan*

*Trolley Station Area*

*The Trolley Station is defined as an Urban Neighborhood Station Area. Urban Neighborhoods are places that have an established development pattern that contain a mix of uses and can support an increase in residential*

*density and supporting commercial activities. New development generally occurs as infill, occurring on undeveloped or underutilized properties. Redevelopment of surface parking lots that front on 400 South is a priority. A compact development pattern is desired in order to focus new growth at the station and respect the existing scale and intensity of the surrounding neighborhood. The highest residential density and intensity of commercial land use occur closest to the transit station and are scaled down the further one moves from the station.*

*The station area comprises of core and transition areas. The purpose of creating the different areas is to recognize the scale and nature of existing development patterns and identify the appropriate locations for growth. The general concept is that bigger buildings with the most dwelling units and a higher intensity level of commercial space should be located closest to the station in the core. The transition area reduces the scale, mass and intensity of new development as it moves away from the core area.*

*12. Identify zoning solutions for the block faces across from Trolley Square on 600 East and 600 South. The focus should be to encourage development on vacant parcels, increase residential density and promote the preservation and adaptive reuse of contributing structures. **The surface parking lot south of Trolley Square should be rezoned to allow Trolley Square to building a parking structure, retain the historic structures fronting on 600 South and build housing.***

*(bold lettering added)*

*15. Encourage development that is compatible with the historic development pattern in the Central City Historic District where appropriate.*

OrdinanceMap Trolleyand900East.png (The map shows that the proposal is NOT in either the core or transition areas which stop at 500 S. The specific area of the proposal was discussed during the public process for Livable Communities and changes to the zoning did not occur.)

Rarely are master plans so specific regarding individuals structures. The amendment to the Central Community Master Plan known as Livable Communities specifically addresses the historic houses on 600 S which are identified in the 2013 Survey as contributory to the Historic District. In the context of this specific and other references in master plans, the proposed demolitions require an amendment to the adopted Central Community Master Plan. They are not consistent with the adopted plans which have been updated as recently as 2012 and 2013.

4. Recently I have used the Atlas Pier system to stabilize two buildings which had settled in ways similar to the "white house." Both projects involved 100% overruns in cost but still came in just over \$20,000. Considering the cost basis in item #1 above, costs far greater than that justify the adaptive reuse of the structures, either as residences, offices, or retails spaces. I am willing to provide the engineering for the registered Atlas Pier system and the invoices from the two projects.

Sincerely, cindy cromer



March 27, 2017

Salt Lake Planning and Zoning Department  
451 South State Street  
Salt Lake City, Utah

RE: The Streets of Ely Place and Sego Avenue

Dear City Officials,

We live on the street named Ely Place and Sego Avenue and have done so for many years. Some of us are second generation. We own the house that our family lives in.


The residents of our street understand that the Ely and Sego is considered a private road. Even though it is considered to be a private road the road is used daily by the public. The City has placed name signs on both ends of the street, the speed is regulated by a City speed sign, there is a sewer line down the middle of the road as well as a regulatory sign. Cars and truck use this road for whatever reasons and have done so for many years on a daily basis. We request that the City accept Ely and Sego as a City street. The public has used this street for decades as a public street. Some say it already is a public street because the public has used it more than ten years. We pay our taxes to and want the City to maintain this street. It is unfair to us to try and maintain this street on our own when the general public is also using it every day.

We are very supportive of the Trolley Square project particularly along the northern side of Ely and Sego. The planned Townhouse apartments will be a tremendous improvement to our neighborhood which has been plagued by old parking lots and abandoned blighted houses. We support demolishing the four old houses on the Trolley property.

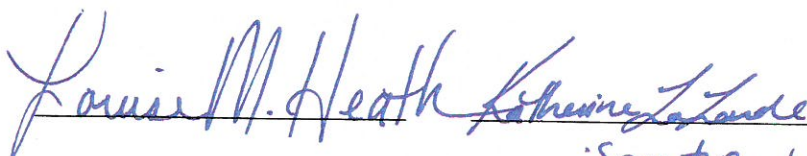
If you want more information or to talk with us please call us.

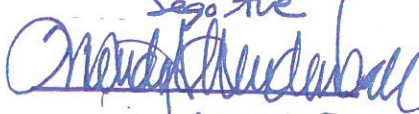
Sincerely,

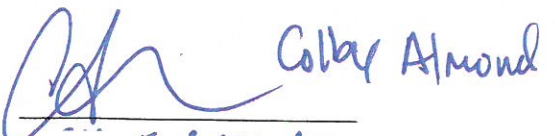


  
Lewis Owen  
ELY PL.

  
E Ely Pl

  
Louise M. Heath  
Sego Ave

  
Sego Ave

  
Colby Almond  
E. Sego Ave

# JACK DAVIS

EAST 600 SOUTH • SALT LAKE CITY, UT 84102 • E-MAIL:

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April 5, 2017

**Re: PLNHLC2016-00915, PLNHLC2016-009118, PLNHLC2016-009119, PLNHLC2016-00920:  
Trolley Square Ventures Applications for Demolition**

Dear Lex and Landmark Commissioners,

My family and I live close to the subject parcels in a contributing historic Victorian home built in 1891 located at East 600 South. In view of the proximity of the subject parcels to our home and the impact that any demolitions will have to the immediate neighborhood and the Central City Historic District as a whole, I am very interested in ensuring that any development is compatible and complementary with the area. After carefully considering the proposed demolitions of the contributing historic homes, I have several general concerns which are detailed below.

## **600 South is a Critical Interface in the Central City Historic District**

The Central City Historic District is perhaps the most threatened local historic district in Salt Lake City due to demolition of contributing historic resources and historically insensitive new development in certain areas of the district. The Community Preservation Plan adopted in 2012 and the Central Community Master Plan (“CCMP”) specifically recognize these challenges to the District.

600 South is a critical interface between the less intact areas of the District and the largely intact residential areas extending towards Liberty Park. Many of the structures fronting 600 South within the District are contributing single family homes. In view of the importance of this 600 South interface, actions that are incompatible with preservation goals within the District should be avoided. Such incompatible actions will not only detrimentally impact the immediate area, but also the integrity of the greater historic neighborhood extending towards Liberty Park through erosion of this important interface.

## **The Historic Homes on 600 South Were Individually Evaluated in 2013 and All Were Determined to be Contributory**

The historic homes fronting 600 South being considered for demolition were specifically evaluated during the recent Central City Historic District Reconnaissance Level Survey (“RLS”) Update in 2013.

In the initial draft of the Central City RLS Update, the subject historic homes were identified by the consultant who prepared the survey as contributory, and Planning Staff recommended adoption of this designation. During the adoption process for the Central City RLS Update, objections were raised by representatives of Trolley Square Ventures (“TSV”) regarding the contributory status of the subject homes in a Historic Landmark Commission hearing conducted on September 5, 2013. In response to the objections by TSV, Planning Staff and the Commission invited TSV to gather and submit evidence relating to why they should be not be designated as contributing, but TSV failed to do so as indicated by Planning Staff during the November 7, 2013, meeting of Historic Landmark

Commission and evidenced by an October 30, 2013, Memorandum from Planning Staff, a relevant portion of which is reproduced below. The Central City RLS Update was thus adopted indicating the contributory status of these homes as recommended by both Planning Staff and the survey consultant.

- Staff met on September 19, 2013 with Douglas White of SK Hart Management, representing Trolley Square. Staff provided survey information on the following properties:
  - 664 E 600 S
  - 630 S 700 E
  - 614 E 600 S
  - 632 S 700 E
  - 7634 S Ely Street
  - 634 S 700 E
  - 652 E 600 S
  - 636 E Seago Street

All properties are classified as "contributing." Mr. White was asked to provide additional evidence supporting a "noncontributing" classification by October 18, 2013 if he felt otherwise. No additional information has been provided. Staff agrees with the recent survey on these properties.

### **The Central City Master Plan Specifically Calls for Preservation of the Historic Homes**

The contributory historic homes fronting 600 South are specifically identified for preservation in applicable community master plans. For example, the CCMP, as amended in 2012 by the Livable Communities Project, encourages as part of the stated "Trolley Station Area Goals"

"12. Identify[ing] zoning solutions for the block faces across from Trolley Square on 600 East and 600 South. The focus should be to encourage development on vacant parcels, increase residential density and promote the preservation and adaptive reuse of contributing structures. The surface parking lot south of Trolley Square should be rezoned to allow Trolley Square to build a parking structure, retain the historic structures fronting on 600 South and build housing."

*Livable Communities Project Amendments to the CCMP at page 10, emphasis added.*

To my knowledge, this is the only instance where relatively modest historic single family homes are specifically identified for preservation in applicable City master plans. The "Trolley Station Area Goals" of the CCMP further proscribes "[e]ncourag[ing] development that is compatible with the historic development pattern in the Central City Historic District where appropriate." *Livable Communities Project Amendments to the CCMP at page 10.*

Other purposes, goals, objectives, and policies articulated in the CCMP that would be frustrated by approval the of proposed demolitions include:

- "Preserve and protect existing single- and multi-family residential dwellings within the Central Community through codes, regulations, and design review." *See CCMP Policy RLU-2.0 at page 10.*
- "Commercial land use encroachment occurs when new businesses are established on formerly residential properties and when existing neighborhood businesses appropriate contiguous

residential properties. Both types of expanding commercial development often cause the demolition of residential structures for commercial land use. This has a severe impact on the character, livability, and stability of the existing residential neighborhood.” See CCMP “Community Input on Commercial Land Uses” at page 100.

- “Most of the demolitions in Central City have occurred as a result of low intensity development on land that is zoned for high-density residential development or automobile-oriented commercial development... Both the zoning of properties within historic districts and the economic hardship ordinance need to be evaluated to encourage adaptive reuse rather than demolition of structures.” See CCMP “Demolitions in Historic Districts in the Central City Community” at page 17, *emphasis added*.

### **The Standards for Approval of a Certificate of Appropriateness for Demolition Have Not Been Met**

Many - if not all - of the standards for approval of a Certificate of Appropriateness for a demolition articulated in the zoning ordinance have not been met. Indeed, the “physical integrity” of the structures remains evident, as reflected by their recently designated contributory status. Demolition of the structures, particularly in view of the loss of historic integrity near the George T. Spokes House located at 680 East 600 South – designed by David C. Dart and designated as historically “significant” in the Central City RLS, would clearly negatively impact “the streetscape within the context of the H historic preservation overlay district.”

While surrounded by a parking lot, the historic homes are not bordered by “surrounding noncontributing structures,” and as such, any demolitions would adversely affect the integrity of preservation overlay district. With respect to any “economic hardship” that would arise from failure to receive demolition approval, representatives of TSV have explicitly stated during multiple prior public hearings indicated that they were unaware that they had purchased the contributing historic homes when they bought the Trolley Square Mall out of receivership. Based on these statements by the applicants, any cost basis in the structures is likely relatively low. Moreover, at least two of the historic homes are current inhabited and/or rented.

Finally, to my knowledge, while the two vacant homes are presently boarded, I am unaware of any maintenance or repairs to the structures or any efforts to solicit and retain potential tenants during TSV’s ownership of the parcels.

### **Alternatives to Demolition**

I have significant reservations regarding the proposed demolition of any contributing historic structure in the Central City Historic District. That said, in the instant case, I would encourage the applicants to carefully consider alternative actions that would retain the historic buildings while enhancing the character, integrity, and development pattern of the Historic District and the immediate block. Particularly, as an alternative to demolition, moving the contributing historic homes south towards Ely and Sego Streets would seem to be consistent with the historic development pattern of the overall block. This is likely economically feasible in view of the relatively low cost basis for the homes. Notably this would help preserve the transitional character of the block, with more modest



historic single family homes becoming increasingly prevalent as the block extends South towards Liberty Park.

Notably, TSV representatives previously indicated to the Planning Commission during their November 9, 2016, meeting an intent to move two of the homes to Ely place for restoration. An excerpt from the relevant minutes of the meeting memorializing this stated this intent is provided below:

area and those that had been removed over the years. The Applicants stated the houses were not significantly contributing structures, explained two would be moved to Ely Place and restored. They addressed the issue of not having the amended zoning regulations

*Minutes from November 9, 2016, Planning Commission Meeting at page 4, emphasis added.*

Thank you for your time and efforts on behalf of the residents of Salt Lake City. I sincerely appreciate your careful consideration of these comments.

Thank you,

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

JACK DAVIS