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> Jason Boal, AICP (801) 257-1917 jboal@swlaw.com

> > November 14, 2022

Salt Lake Planning Commission 451 South State Street Salt Lake City, UT 84111

Re: Petition for Zoning Map Amendment for the property located at 510 S 200 W, Salt Lake City, Utah, parcel no. 15-01-452-023-0000.

On behalf of SLC 510 SOUTH 200 WEST, LP, the owner of the parcel located at 510 S 200 W, which is also known as parcel # 15-01-452-023-0000, in Salt Lake City, as shown in **Exhibit A**, we would like to submit this petition for a Zoning Map Amendment to change the zoning designation of this parcel. We are requesting the zoning designation be changed to D-1, Central Business District from the current zoning designation of D-2, Downtown Support District. This petition is submitted pursuant to Salt Lake City Code § 21A.50.

The Salt Lake City Zoning Code allows a property owner to initiate a zoning map amendment, by submitting an application for the amendment to the Salt Lake City Planning Commission. *See Salt Lake City Code § 21A.50.030*. This letter and the attachments will satisfy the required information that needs to be included in a rezone petition, specifically:

- 1. A statement of the text amendment or map amendment describing the purpose for the amendment and the exact language, boundaries and zoning district;
- 2. Street address and legal description of the property;
- 3. A complete description of the proposed use of the property where appropriate;
- 4. Site plans drawn to scale (where applicable); and
- 5. Related materials or data supporting the application as may be determined by the applicant and the zoning administrator.

See Salt Lake City Code § 21A.50.040.A

6. Fees

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See Salt Lake City Code § 21A.50.040.B

1. <u>The purpose for the amendment and the exact language, boundaries and zoning district.</u>

Zoning designations

Currently, the property located at 510 S 200 W is located in the D-2, Downtown Support District, as shown in **Exhibit B**. The properties across the street to the east, northeast and southeast are already zoned D-1 while the properties to the west and south are zoned D-2. The purpose statement of the D-2 district is:

The purpose of the D-2 Downtown Support Commercial District is to provide an area that fosters the development of a sustainable urban neighborhood that accommodates commercial, office, residential and other uses that relate to and support the Central Business District. Development within the D-2 Downtown Support Commercial District is intended to be less intensive than that of the Central Business District, with high lot coverage and buildings placed close to the sidewalk. This district is appropriate in areas where supported by applicable master plans. Design standards are intended to promote pedestrian oriented development with a strong emphasis on a safe and attractive streetscape.

The Salt Lake City Planning Commission recently considered and recommended approval to Salt Lake City Council a Land Use Code text amendment that addressed "Downtown Building Height and Street Activation". The purpose of those code amendments was to "accommodate growth and respond to new development pressures while developing standards for public spaces that improve the livability of the downtown area." The text amendment that has gone to city council included an increase to building height in all the downtown districts (D-1 to D-4), except for D-2. The additional height was intended to provide one tool for increasing density or intensity of development in the downtown area. This property is in the area where the Planning Commission has determined additional density and intensity of development is appropriate.

Along with the text amendments, there was consideration of modifying the Zoning Map in the downtown area, specifically to the D-2 areas of the zoning map¹:

This project may include changes to the zoning map, particularly the D2 zone located between 400 South and 700 South and 300 West to West

¹ Salt Lake City story map - Downtown Building Height and Street Activation Updates - <u>https://storymaps.arcgis.com/stories/2afa66ba9d684dacb480edec55f86dd1</u>

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Temple and from 600 South to 800 South between the west side of State Street and 200 West.

We understand the Zoning Map amendment of properties from D-2 to D-1 were not ultimately included in the recommendation to City Council. Additionally, there were no modifications to the height limitations of the D-2 zone, due to the potential impact on historical neighborhoods that are adjacent to the D-2 district. Our property is not located near those historical neighborhoods. We understand the desire to accommodate growth yet be able to mitigate impacts of existing neighborhoods. This application for a rezone to the D-1 district will allow the Planning Commission to consider the appropriateness of the D-1 standards on a specific parcel, as opposed to a change to the map or text that would impact multiple properties.

We are requesting that the 1.02 acre parcel located at the southwest corner of 200 West and 500 South be rezoned to the D-1 Central Business District zone. The purpose statement of the D-1 zone is:

The purpose of the D-1 central business district is to provide for commercial and economic development within Salt Lake City's most urban and intense areas. A broad range of uses, including very high density housing, are intended to foster a twenty four (24) hour activity environment consistent with the area's function as the business, office, retail, entertainment, cultural and tourist center of the region. Development is intended to be very intense with high lot coverage and large buildings that are placed close together while being oriented toward the pedestrian with a strong emphasis on a safe and attractive streetscape and preserving the urban nature of the downtown area. This district is appropriate in areas where supported by applicable master plans. The standards are intended to achieve established objectives for urban design, pedestrian amenities and land use control.

Salt Lake City's downtown is experiencing growth. As mentioned before, the Planning Commission reviewed and recommended approval of modifications to the zoning code in order to accommodate this growth. The location of this property lends itself well to a future redevelopment that will have a "positive impact on human-scale orientation, pedestrian accessibility, and community character". With the proposed changes found in the Downtown Land Use Code text amendment, the D-1 zone provides the most advantageous framework to accomplish those goals.

Salt Lake City Downtown Master Plan

This property is found in the Grand Boulevards District of the Salt Lake City Downtown Master Plan, as shown in **Exhibit C**. This area is "a major point of arrival to

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the downtown". They are designed to "transition vehicles from highway speeds to an integrated, urban environment." Additionally, the redevelopment of this area will include "mid-rise buildings that shape the street edge and provide residential, innovation and research development, and additional office development in an urban development pattern". The recently modified D-1 zone provides a better opportunity to accomplish these goals.

2. Street address and legal description of the property

The property is located at: 510 W 200 South, Salt Lake City, Utah

The legal description of the property is: BEG NE COR LOT 6, BLK 31, PLAT A, SLC SUR; S 0°08'47" W 251.15 FT; N 89°50'22" W 198.07 FT; N 0°08'47" E 86.05 FT; S89°50'22" E 33 FT; N 0°08'47" E 165.1 FT; S 89°50'21" E 165.07 FT TO BEG.

3. A complete description of the proposed use of the property where appropriate

Currently, the property is used for 32,097 sq ft of office space. No decision on a future use has been determined at this point. The future use would need to be a permitted or conditional use in the D-1 Zone.

4. A Site plans drawn to scale (where applicable).

Not applicable. No site plan for the unknown future use has been created.

5. <u>Related materials or data supporting the application as may be determined by the applicant and the zoning administrator.</u>

In addition to the information provided in Section #1 above, the following information demonstrates how this petition for a Zoning Map amendment is supported by various Salt Lake City Master Plans:

Plan Salt Lake – December 1, 2015

- I. Neighborhoods a. Initiatives:
 - 1. Maintain neighborhood stability and character.

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> Approval of this rezone will allow the property to be redeveloped, ensuring the Grand Boulevard Neighborhood stays active and a grand entry/exit to the downtown.

2. Support neighborhoods and districts in carrying out the City's collective Vision.

The Grand Boulevard Neighborhood is a main entry/exit to the Salt Lake City downtown, as established in the Downtown Master Plan. Supporting growth and redevelopment in this neighborhood is vital for accomplishing the goals of the Downtown Master Plan.

8. Encourage and support local businesses and neighborhood business districts.

Approval of this rezone will allow more a more "intense" utilization of the property. This will attract more people to this neighborhood, supporting existing and new businesses.

10. Improve the usefulness of public rights-of-way as usable public space.

With the recent changes to the D-1 Land Use Code, there will be an emphasis on pedestrian accessibility and human scale orientation, as opposed to the auto-oriented design that currently exists on the property. This will help initiate a transformation of both 500 South and 200 East.

- II. Growth
 - a. 2040 Target:
 - i. Increase Salt Lake City's share of the population along the Wasatch front.

In order to accommodate the increased population in Salt Lake City, areas of more "intense" development will need to be approved. The existing zoning has produced the existing land use and traffic patterns. If more intense uses (both commercial & residential) are desired, areas where more intense development is appropriate should be approved. This property is located in an area where the Planning Commission has already considered increasing the intensity of development.

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- b. Initiatives:
 - 1. Locate new development in areas with existing infrastructure and amenities, such as transit and transportation corridors.

This location fits this initiative perfectly! Not only is it located along a transportation corridor, redevelopment of this parcel will be vital in the transformation of design along the corridor.

3. Promote infill and redevelopment of underutilized land.

Currently this parcel is being underutilized. With the rezone and redevelopment, this parcel, which is part of the Downtown neighborhood can be properly utilized.

6. Accommodate and promote an increase in the City's population.

In order to accommodate the increased population in Salt Lake City, areas of more "intense" development will need to be approved. The existing zoning has produced the existing land use and traffic patterns. If more intense uses (both commercial & residential) are desired, areas where more intense development is appropriate should be approved. This property is located in an area where the Planning Commission has already considered increasing the intensity.

- III. Housing
 - a. 2040 Target:
 - i. Increase diversity of housing types for all income levels throughout the city.

This rezone will permit the opportunity for more intense residential and/or commercial development in the Downtown Neighborhood.

b. Initiatives:

4. Direct new growth toward areas with existing infrastructure and services that have the potential to be people-oriented.

This rezone will direct redevelopment into an area with existing infrastructure and services.

5. Enable moderate density increases within existing neighborhoods where appropriate.

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The rezoning of the property from D-2 to D-1 is a moderate increase in density and/or intensity for non-residential development.

7. Promote high density residential in areas served by transit.

The Courthouse Trax stop is just over two (2) blocks from this site to the east. The #4 bus line runs just one (1) block north on 400 S.

- IV. Transportation & Mobility
 - a. 2040 Target:
 - *i*. Public transit within 1/4 mile of all homes

The Courthouse Trax stop is just under a half (1/2) mile from this site to the east. The #4 bus line is less that a quarter (1/4) mile to the north on 400 S.

ii. Reduce single occupancy auto trips

Increasing the density/intensity of the Downtown neighborhood will allow more people to live and work in the urban core of Salt Lake City. This will reduce the need to live or work outside the Downtown neighborhood and commute in or out.

iii. Decrease pedestrian, bike, and auto accident

The redevelopment of this property will need to meet the newly adopted D-1 standards, which focuses on pedestrian accessibility. Redevelopment along 500 S and 200 W will help bring the human scale to this corridor and decrease the "interstate- like" feel it currently has.

- b. Initiatives:
 - 2. Prioritize connecting residents to neighborhood, community, regional, and recreation nodes by improved routes for walking, biking and transit.

Redevelopment along 500 S and 200 W will help bring the humanscale to these streets, where they are currently very auto-centric streets.

4. Reduce automobile dependency and single occupancy vehicle trips.

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> Increasing the density/intensity of the Downtown neighborhood will allow more people to live and work in the urban core of Salt Lake City. This will reduce the need to live or work outside the Downtown neighborhood and commute in or out.

5. Make walking and cycling viable, safe, and convenient transportation options in all areas of the City.

Redevelopment along 500 S and 200 W will help these roads be more pedestrian and cycle friendly. The current auto-oriented design takes the focus away from pedestrians and bicyclists.

12. Incorporate pedestrian oriented elements, including street trees, pedestrian scale lighting, signage, and embedded art, into our rights-of-way and transportation networks.

Through redevelopment of existing areas, this will be easier to accomplish.

- V. Air Quality
 - a. 2040 Target:
 - *i*. Reduce emissions.

Increasing the density/intensity of the Downtown neighborhood will allow more people to live and work in the urban core of Salt Lake City. This will reduce the need to live or work outside the Downtown neighborhood and commute in or out.

ii. Reduce citywide consumption of energy

The redevelopment of old buildings allows for more efficient designs and materials to be used.

- b. Initiatives:
 - 3. Increase mode-share for public transit, cycling, walking, and carpooling.

Increasing the density/intensity of the Downtown neighborhood will allow more people to live and work in the urban core of Salt Lake City. This will allow for an increased opportunity and utilization of public transit, cycling, walking and carpooling.

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4. Minimize impact of car emissions

Increasing the density/intensity of the Downtown neighborhood will allow more people to live and work in the urban core of Salt Lake City. This will reduce the need to live or work outside the Downtown neighborhood and commute in or out.

VIII. Beautiful City

- a. 2040 Target:
 - i. Pedestrian oriented design standards incorporated into all zoning districts that allow residential uses.

The Planning Commission has recently recommended approval to City Council for more pedestrian oriented design standards for the D-1 zone. This rezone would allow these standards to be used on a major entry/exit corridor into the Downtown Neighborhood.

- b. Initiatives:
 - 1. Reinforce downtown as the visually dominant center of the City through the use of design standards and guidelines.

The Grand Avenues Neighborhood is one of the main entry/exit points of the Downtown. Redeveloping property along 500 S and 200 W with the newly amended standards is how to reinforce the downtown as the visually dominant center of the City.

2. Identify and establish standards for key gateways into the City.

Although this applies to regulations the city intends to adopt, this property is on a key gateway and the ability to redevelop with a more intense use will help establish the downtown neighborhood.

XI. Equity

- a. 2040 Target:
 - i. Decrease combined cost of housing and transportation.

Increasing the density/intensity of the Downtown neighborhood will allow more people to live and work in the urban core of Salt Lake City. This will reduce the need to live or work outside the

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> Downtown neighborhood and commute in or out, thus decreasing the cost of transportation. More dense residential development will increase the supply, thus responding to the demand and hopefully decreasing the overall cost of housing.

- b. Initiatives:
 - 4. Support policies that provide housing choices, including affordability, accessibility and aging in place.

Increasing the density/intensity of the Downtown neighborhood will allow more people to live and work in the urban core of Salt Lake City. This will allow for more residents and more services available in the downtown area.

- XII. Economy
 - a. 2040 Target:
 - ii. Percentage of households within 1/2 mile of a neighborhood, community or regional business node.

The rezone and redevelopment of this property will increase the likelihood of the property being utilized for residential and or more intense commercial uses. This in turn will increase the likelihood that it would be within $\frac{1}{2}$ mile or provide services to residents within $\frac{1}{2}$ mile.

- b. Initiatives:
 - 1. Maintain and grow Salt Lake City as the economic center of the region.

In order to maintain and grow Salt Lake City, redevelopment of under-utilized parcels will need to happen. The appropriate location for redevelopment is near the urban core and on parcels that are underutilized, such as this one.

We look forward to the opportunity to have our application heard by you at a public hearing in conformance with Salt Lake City Code § 21A.50.040.F.



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Respectfully,

Jason Boal, AICP

CC Geoffrey Palmer (via email)

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EXHIBIT A Property Location

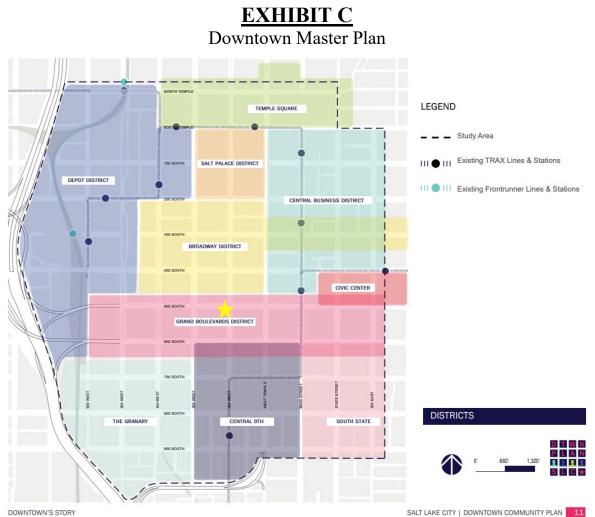


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SALT LAKE CITY | DOWNTOWN COMMUNITY PLAN 11