

Property Address: 238 S Concord St and 1255 W Pierpont Ave SLC UT 84104

Parcel IDs: 15021540280000 and 15021540270000

Master Plan: Westside Master Plan

Current Zoning District: R-1/5,000 Single-Family Residential

Proposed Zoning District: RMF-30 Low Density Multi-Family Residential

Additional items submitted concurrent with this letter:

1. Aerial map of Concord Pre I-80
2. Photos of Historical Development Pattern and Built Environment
3. Comparable Approved Zoning Amendments
4. MLB & Power District Plan
5. Photos of ongoing issues
6. Redevelopment potential under RMF-30 and R-1/5,000
7. Supporting goals, objectives, and policies of the City
8. Community Benefits Analysis

Request: The property owners are petitioning to amend the zoning classification for 2 adjacent parcels located at 238 S Concord St and 1255 W Pierpont Ave SLC UT 84104 (the “Project” or “Subject Property”) from R-1/5,000 to RMF-30. To develop the Subject Property as intended by the owners, it is necessary to request a change to the zoning classification. The intention is to build family sized housing units, with each home having its own lot, in a manner consistent with the historical development pattern, size, density, and character of the community.

The current zone of R-1/5,000, which was adopted in the 1990s, does not advance the purposes, goals, objectives, and policies of Salt Lake City (the “City”) as stated in Plan Salt Lake, Housing SLC and the Westside Master Plan (WSMP). Much of Poplar Grove is assigned R-1/5,000 zoning; however, the historical development pattern of the area and existing built environment demonstrates a frequency of higher density and smaller parcels. Many homes would not be permitted today under the burdensome lot minimum and street frontage requirements of the R-1/5,000 zone. Modernizing the zoning on the property to RMF-30 will bring land use regulations into agreement with stated city goals while only incrementally increasing the density allowance. The RMF-30 Zone much like the R-1/5000 zone is a low-density residential zone in addition, development regulations are similar regarding bulk, setbacks, and building height.

In support of rezoning the Property to RMF-30 Zone, the property owners respectfully request the City to balance existing rules and regulations with flexibility for change and growth, as is established in WSMP.

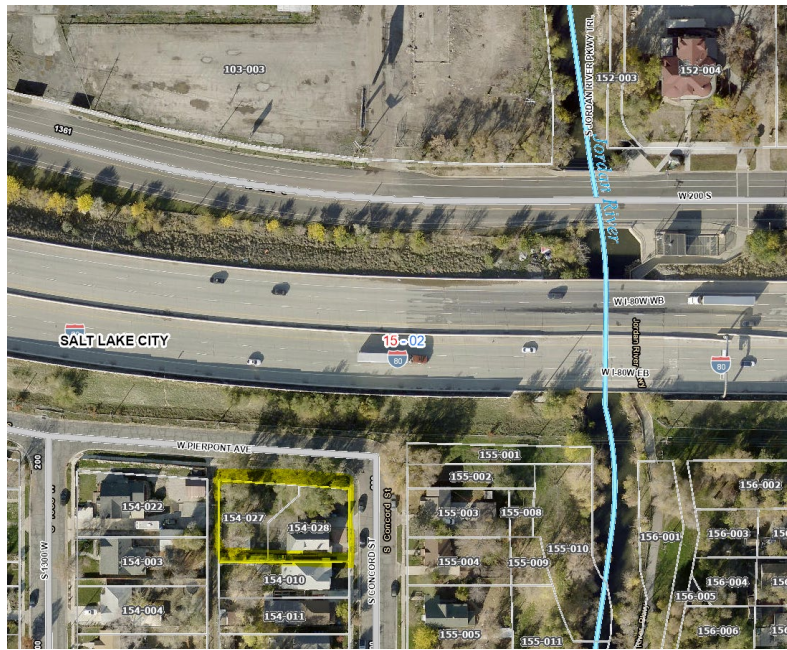
Property Background: The owners purchased the Property in 2014 while in their early 20s working and studying at college. Entry level home ownership used to be more obtainable for young families, but today, many SLC residents are not extended this same opportunity due to scarcity of family sized housing and generally unfavorable market conditions.

The property is located on a dead-end road at the convergence of Concord St, Pierpont Ave, and I-80. The block is bisected by a mid-block interior alleyway which is used to access the west side of the properties. The two parcels together create over 10,700 square feet of highly underutilized space, with only a small 2-bedroom home (built in the 1880’s / received substantial earthquake damage in 2020) contributing to the City’s housing stock.

In 2018, a Lot Line Adjustment was done to create a conforming buildable lot facing Pierpont Ave. This was done to remediate the non-conforming parcel that was left over when eminent domain took property to create I-80 which left behind a sliver of land along Pierpont Ave where a home once stood. These parcels, this community, and much of the west side was devastated by the creation of I-80 and I-15 and historical redline practices that hindered investment and development. The owners are looking to, bring investment back to this community, and are simply asking for a decrease in lot size requirements found in RMF-30, which would allow more flexibility and options to build small scale family sized housing, that is in line with historical development patterns of the community, Westside Master Plan (WSMP), and City housing plans.

*** See attachment 1. Aerial map of Concord Pre I-80**

The graphic below shows the 2 building lots available today. Immediately apparent is the strange shape and configuration of the lots; however, this is the shape and configuration that was required by City code in 2018 to meet the restrictive street frontage and lot requirements within the R-1/5,000 zone to create “conforming” lots.



Proposed Development: Following the historical development pattern and built environment of the neighborhood, the property owners would attempt to repair the existing single-family home and build additional family sized housing units similar in size, scale, and compatibility to the existing neighborhood in accordance with the Westside Master Plan. The RMF-30 zone, with its less restrictive lot size minimum requirements, is in line with the historical development pattern and built environment, adheres to City plans and guidance, and is documented in sections *(a) – (g)* below with accompanying attachments.

***(a)** The Project will not materially affect adjacent properties.*

The Project will in no way fundamentally change the residential nature of the neighborhood as the land use will continue to be “Low-Density Residential”. The property owners have already and will continue to engage with the Community Council and the City to ensure any project will be context sensitive to the

existing character of the neighborhood while providing opportunities for new growth and to enhance the sense of place.

The home abuts I-80 to the North, a City owned parcel for Jordan River access to the East, and is surrounded by streets and an alley on 3 of 4 sides. There will be minimal impact on surrounding properties as they are primarily vacant state and City parcels; however, there is an opportunity to greatly enhance the surrounding neighborhood.

The dead-end nature created by I-80 at the convergence of Concord Street and Pierpont Ave has led to an ongoing problem with a significant criminal element. Currently, there are no houses facing Pierpont Ave. Pierpont Ave and the I-80 frontage has been a hotbed of crime including recurrent illegal dumping, excessive drug activity, and even arson. The property owners would like to create a true street out of Pierpont Ave where one currently does not exist. Having more eyes on the street and the sense that this is a “neighborhood” not a frontage road will help greatly reduce the current problems with the location.

**See attachment 5. “Photos of ongoing issues”*

(b) Consistent Land Use.

The land use of the Property will remain residential, not mixed use, and will be consistent with land use in the surrounding neighborhood. Additionally, a drive through the surrounding neighborhood shows small lots and homes throughout. Various multi-family duplexes, triplexes, and apartments (all with an R-1/5,000 zoning assignment) are present within a few hundred feet of the proposed Project. Attached within the application is a document that outlines the historical and existing development pattern in the area, which demonstrates the reasonability of the rezone request.

**See attachment 2. “Photos of Historical Development Pattern and Built Environment”*

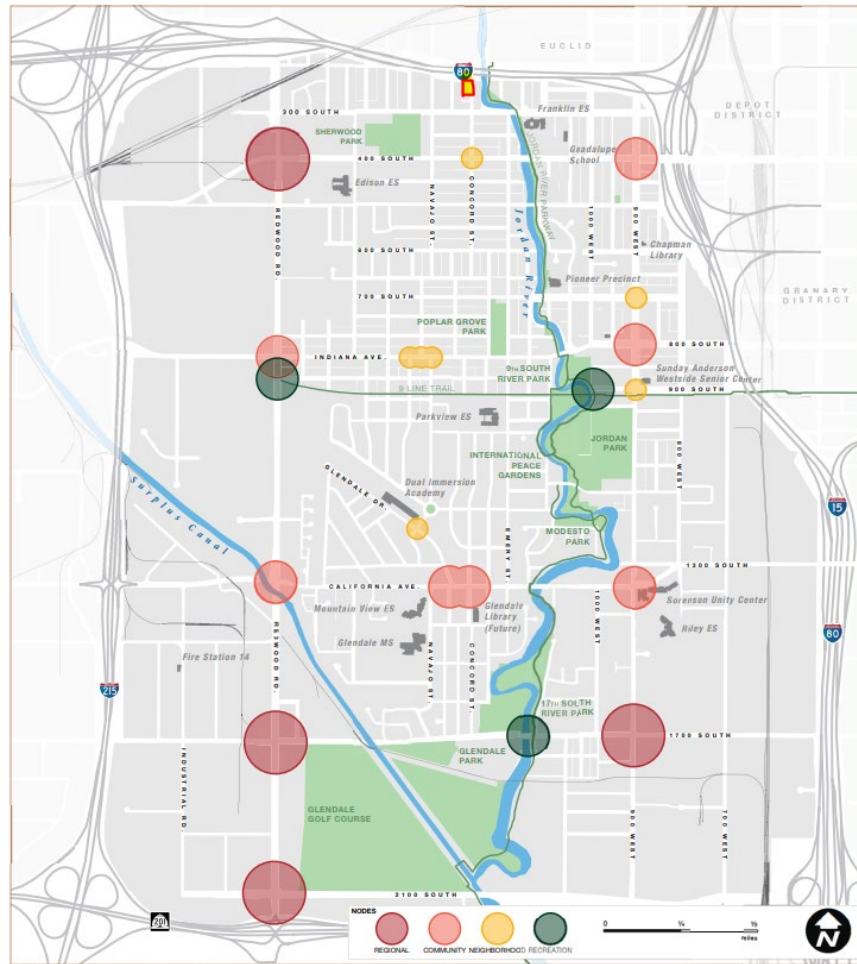
As was noted in the introduction, most of the Poplar Grove community and its single-family homes would not be permitted under the burdensome lot minimum requirements of the R-1/5,000 zone, as is evidenced by the attached map and highlights (**attachment 2.*). R-1/5,000 has the second smallest minimum lot size requirement in the City, and it is still larger in scale than the historical development pattern. The only available zoning classification that could maintain the single-family use status while having a smaller minimum lot size more consistent with the community would be RMF-30.

Smaller homes and lots are part of what gives this community a unique identity, differentiates it from other parts of the City, and has kept it a more affordable option for many SLC residents.

(c) Implementation of the Westside Master Plan, Housing SLC, and Plan Salt Lake.

The property owners recognizes that the Property is in the Westside district and subject to, among other planning documents, the Westside Master Plan. The proposed amendment to the Zoning Map is intended to support appropriately scaled housing choices as recommended by the Westside Master Plan which provides for Special Single-Family Allowances.

The master plan details the challenges it faces in developing the community and the “barriers in and out of Poplar Grove underscore the community’s need to grow from within”.



The locations of the various types of nodes throughout the Westside Master Plan's study area.

The Project (highlighted in yellow with bright red outline) is located within proximity (less than 1000 feet) from a designated neighborhood node. The Westside Master Plan states the following: “Neighborhood nodes rely on the neighboring residential properties because they are not intended to bear a heavy load of new residential development”. In addition to the neighborhood node, a community node and a regional node are within walking distance. Nodes are intended to increase the stability of existing neighborhoods by providing necessary daily or discretionary retail and service options, and by providing opportunities for employment and recreation within the community. “The viability of the nodes relies on people to access their activities and services. To support these uses, more residents are needed within the vicinity”.

Page 34 of the WSMP states the following-

Special Single-Family Allowances: The Salt Lake City Planning Division should explore regulatory options for permitting unique, single-family residential development within the existing single-family zoning districts. Examples of special single-family developments include small-lot, detached, single-family residential units on parcels that are currently considered too small for development and attached single-family residential units.

*Multi-Family Infill Allowances: The Salt Lake City Planning Division should explore regulatory options for allowing two- or multi-family development on lots that are zoned for only single-family where appropriate. Appropriate cases include lots that have **unique shapes** or where the **impact on adjacent properties would be negligible due to the unique properties of the parcels**. Regulations such as these can help add even a small amount of additional density without impacting the prevailing single-family character of the Westside.*

The property owners believe they hit both these requirements out of the ballpark.

(Speaking of ballpark... see section (e) Future Developments, where a proposed MLB stadium would be within walking distance of the Subject Property)

****See attachment 7. "Supporting goals, objectives, and policies of the City" for additional adherence to Westside Master Plan, Housing SLC, and Plan Salt Lake.***

(d) Comparable Zoning Amendments granted.

Similar Zoning Amendments have been granted throughout Salt Lake City, with the most recent and similar request being granted for the City owned parcel at 1050 W 1300 S, which rezoned an R-1/5,000 lot surrounded by single family homes, near the Jordan River, within the "riparian corridor" (which subject property is not) to RMF-30. The same Master Plan and City policies apply to both this property as well as the Subject Property.

****See attachment 3. "Comparable Approved Zoning Amendments"***

(e) Future Developments.

Just a few hundred feet to the north, parties are working to build a Major League Baseball stadium as well as high-density housing units. Attached are preliminary renderings, one of which depicts a location roughly 1000 feet from the Subject Property.

****See attachment 4. "MLB & Power District Plan"***

(f) Adequate Public Facilities and Services.

The Project is small scale and limited to residential units/lots, which will have a minimal impact on traffic and other required public facilities.

(g) Affordable Housing Incentives consideration.

The property owners have been closely following the AHI developments for years. They issued letters of support which were included in the public record. While the plan is a good step in the right direction, the property owners have not been able to make the AHI work or pencil for this project while creating family sized housing as is explained below and believe a much better end product is achievable with RMF-30.

As noted in the "property background" section, due to the odd shape and configuration of these parcels, development under the current R-1/5,000 zoning is not practical due to the awkward buildable box. The AHI requires all developments to be within the buildable box of an existing R-1/5,000 property. Cottage developments, and even single-family attached projects would be extremely challenging without a large piece of square land.

To remedy the odd lot shapes and configurations, a planned development would be needed, which would be an undertaking in itself, is not guaranteed, and would still heavily underutilize the developable land. If this were a mid-block property, the AHI may make more sense for a smaller scale development, but due to the unique corner lot location, ample street frontage, and minimal impact on surrounding parcels, additional density afforded in the RMF-30 Zone is appropriate.

In theory, the property owners could use the AHI to build 2 large 4-Plexes (8 total units) on the existing lots; however, they do not believe this is a desirable outcome as the goal is to create modest family sized housing (which the City is significantly lacking) and create real street frontage along Pierpont Ave. Looking at comparable comp sales in the area, modest sized housing units built in this project would not sell for greater than the area median priced house.

Ignoring the AHI and any rezone, as it stands today, 2 large homes (4000 sq ft+) as well as 2 detached ADUs could be built while still meeting all setback and lot coverage requirements of R-1/5,000 without requiring any public input. This would not fit the character of the neighborhood or achieve the goals of the community and City; further, this demonstrates how the current zoning rules do not fit with the historical development pattern of the community. Salt Lake City needs more people in houses, not less people in bigger houses.

**See attachment 6. Redevelopment potential under RMF-30 and R-1/5,000*

In closing: Recent City plans and documents have recognized that as the population of Salt Lake City grows, prices are spiking, leaving folks with fewer housing options, and pushing some people out altogether. Family-sized housing is desired and needed. This rezone provides the unique opportunity to build in an area where it will cause minimal disruption, and with the increased density of the project will come increased attainability in pricing. Creative infill projects are needed if Salt Lake City wants to create attainable family housing.

Implementing these various goals, objectives, and policies, as reflected in the adopted planning documents, requires a unique approach of balancing the existing rules and regulations while exercising flexibility to achieve real and responsive change that will encourage the market to develop the diverse and affordable housing needed to accommodate the growing community.

We believe this Rezone Request is consistent with the City's development goals and objectives to provide diversity of housing types and to support attractive and well-maintained neighborhoods. We appreciate the City's consideration of these matters and look forward to working with you.