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October 2, 2025

Planning Commission
Salt Lake City Corporation
451 South State Street, Rm 406
P.O. Box 145480
Salt Lake City, Utah 84114-5480

Re: Alley/Street Vacation Application - Property at 2191 South 2000 East, Salt Lake City, Utah 84106

To Whom It May Concern:

This letter is being written in support of application by and on behalf of the Vince and Janice Rampton Family Trust (Vincent C. and Janice W. Rampton, trustees, hereafter "Applicant") for vacation of a section of right-of-way abutting Wilmington Avenue in Salt Lake City, Utah.

BACKGROUND

Applicant has, since January of 2020, been the owner in fee simple of the following parcel of real property located at 2191 South 2000 East, Salt Lake City, Utah:

The south 72 feet of Lot 1, Block 7, Rosslyn Heights, a subdivision of part of Section 21 and 22, Township 1 South, Range 1 East, Salt Lake Base and Meridian, more particularly described as follows: Beginning at the southeast corner of said Lot 1, and running thence north 72 feet; thence east 162.16 feet; thence south 72 feet; thence west 162.16 feet to the point of beginning. Parcel No. 16-22-104-013-0000.

("Rampton Property") Prior to that time, the property was, since June of 1990, titled in Vincent C. and Janice W. Rampton, who in turn acquired it from Scott and Christine Cameron, who in turn acquired it from the original owner.

The residence located on the Rampton Property was constructed in the mid-1940s. It occupies the northeast corner of the intersection of 2000 East and Wilmington Avenue. As

indicated in the above-referenced legal description, the property was subdivided as part of the development of Rosslyn Heights Subdivision.

From the time the residence was first constructed on the Rampton Property, its side yard has enclosed a triangular parcel of land lying between its southern boundary and the edge of the Wilmington Avenue right-of-way. Since construction, the residence has included fencing along Wilmington Avenue, its abutting park strip and sideway—see enclosed photographs. This enclosed area lying outside the property's record boundary line is described as follows:

Beginning at a point, said point being the North 0°12'00" East 32.84' and West 77.33' from the street monument at the intersection of Wilmington Avenue and 2000 east Street and running,

Thence North 0°37'55 East 1.17 feet;

thence South 89°52'41" East 117.83 feet;

thence South 00°02'03" West 23.27 feet to the northerly edge of sidewalk;

thence along the Northerly edge of the sidewalk the following three (3) bearings and distances: (1) westerly, 67.06 feet along a non-tangent curve to the left of which the radius point lies South 27°51'50" West a radius of 197.90 feet, and having a central angle of 19°24'51"; (2) North 86°18'26" 21.85 feet; (3) thence North 89°44'56" West 32.62 feet;

thence North 00°37'55" East 1.17 feet to the point of beginning.

Contains 775 square feet

(Disputed Area") See enclosed survey. The Ramptons, their predecessors-in-interest and now the Rampton Trust have always occupied the Disputed Area as part of the side yard of the Rampton Property. At no time has the city utilized any portion of the Disputed Area.

Immediately to the east of the Rampton Property lies a neighboring residence apparently belonging to Matthew and Kara Agresta and their family. The legal description of the Agresta property extends to the edge of the Wilmington Avenue right-of-way, thus enclosing the Disputed Area on the east and preventing its use as a portion of the Wilmington Avenue right-of-way.

While historical records are scant, it appears that when Rosslyn Heights Subdivision was first platted, it was contemplated that Wilmington Avenue would proceed past its south side in a straight east-west configuration; however, with development properties to the east (which are not part of the subdivision), Wilmington Avenue had to jog to the south as it passes the Rampton Property, thus creating a dead space between the Wilmington Avenue right-of-way and the property. *See* enclosed plat map.

The Disputed Area has never been used for any city purpose. It contains no utilities. At no time has the city ever objected to or challenged enclosure and occupancy of the Disputed Area by any resident of the Rampton Property.

The Ramptons elected, more than 20 years ago, to replace the long-standing chain-link fence flanking the Disputed Area on the south with a white picket fence. Over time, this fence deteriorated, prompting the Ramptons (now as trustees of the Rampton Trust) to replace the fence with steel fencing. When their builder made application for a building permit, however, he was notified that the permit could not be granted, as the long-standing fence did not track the Rampton Property's record boundary line.

Seeking to avoid a legal dispute, Ramptons complied with the suggestion of the city's Real Estate Department in submitting an application for an encroachment permit onto the Disputed Area. This application was submitted to all relevant city departments, all of which approved it. When the Ramptons received the proposed encroachment agreement, however, its terms were too transitory for the Rampton Trust's permanent occupancy of the Disputed Area up to the proposed fence line. A second proposal from the Real Estate Department, for a residential lease agreement, was then explored; however, it contained the same limitations as the encroachment permit (a duration of definite term, followed by a mandatory removal of the fence).

All the foregoing prompted the Ramptons to defer the fence project until this application was made and acted on by the city.

FACTORS MILITATING IN FAVOR OF VACATION

1. **Lack of city use.** The Disputed Area has never been used for any city purpose. It is useless as an extension or continuation of Wilmington Avenue, which curves smoothly to the south and is flanked on its northern side by park strip and sidewalk, and on the east by the Agresta property.

2. **Public safety.** As it presently exists and is situated and utilized, the Disputed Area is no way detrimental to public safety. However, if (as demanded by this department) replacement fencing is run along the south record boundary line of the property, a "no man's land" will be created between the residence and Wilmington Avenue, which serves no useful purpose, and would be likely to collect weeds and debris.

3. **Urban design.** The existing layout of Wilmington Avenue *vis-à-vis* the Rampton Property (including the Disputed Area) constitutes the established urban design of the Rosslyn Heights neighborhood which has existed for the better part of the century. Carving out a triangular section of land to the south of the Rampton Property would serve no valid urban design purpose, and would instead create a useless eye sore in an otherwise attractive and well-designed neighborhood.

4. **Community purpose.** Petitioners are not proposing to restrict access to the Disputed Area in favor of any community use, but rather as a part of their yard—as it has been for over 70 years.

5. **City department approval.** All city departments have already approved the concept represented by this application: the continued use of the Disputed Area as part of the Rampton Property.

6. **Denial of access.** The proposed vacation will not deny access to any adjoining parcel of property.

7. **Landlocked property.** The proposed vacation will not result in any property being landlocked.

8. **Policies and goals of the city.** Vacation of the Disputed Area by the city will not interfere with, or be contrary to, the policies and goals of the city. To the contrary, it will expand the taxable parcel belonging to the Rampton Trust, and will replace record title to a useless title of property with revenues from its transfer.

9. **Garage construction.** No abutting property owner is intending to build a garage on or anywhere near the Disputed Area, which is both too small and ill-situated for such a purpose.

10. **Scope of petition.** This petition does not seek to vacate an entire street or alley, but does seek to vacate a section of the Wilmington Avenue right-of-way, which has never been used for public purposes, and which can serve no municipal purpose going forward.

11. **Rear access.** The property is not situated to provide actual or potential rear access to any adjacent residence or other use.

CONCLUSION

The city has no earthly use for the Disputed Area. It is, at best, an unused and unusable fragment of property in the city's real estate portfolio. Proceeds from this vacation and transfer would be of far more use to the city, as would increased property taxes going forward.

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Please feel free to contact me if you have any questions.

Cordially,

PARSONS BEHLE & LATIMER

Vincent C. Rampton

Encls.



Wilmington Ave

Wilmington Ave

2000 E

S 2000 E

Wilmington Ave

Wilmington

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2204

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Google Maps

