



MEMORANDUM

PLANNING DIVISION
COMMUNITY & ECONOMIC DEVELOPMENT

To: Salt Lake City Planning Commission
From: Nick Norris, Planning Manager
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Date: April 7, 2016
Re: TSA Zoning District Review

ACTION REQUIRED: No action is required. However, the Commission may want to consider initiating a petition to make modifications to the TSA zoning district

BACKGROUND/DISCUSSION: Earlier this year, the Planning Commission asked the Planning Division to review the TSA zoning district to see if it is implementing the stated purpose of the district. Specifically, the Planning Commission asked:

- What types of developments are being constructed?
- What is the mix of market rate housing vs. affordable housing?
- Should changes be made to the ordinance?
- Is the point system strong enough to help achieve housing goals?
- Should changes be made to the guidelines and point system?

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SUMMARY: The TSA zoning district has triggered new investment and development in and near the University Trax Line (400 South) and the Airport Trax Line (North Temple). The most visible projects are large multi-family developments but there are a number of smaller scale non-residential developments that have also been constructed. The majority of the housing built is considered market rate.

The approval process in the TSA zoning district is based on a development score. The development score is determined by how many of the adopted development guidelines are incorporated into a project. Each guideline is assigned a point value. The ordinance establishes a tiered approval process that is as follows:

- Tier 1: 0-49 points requires Planning Commission approval
- Tier 2: 50-99 points requires an administrative public hearing
- Tier 3: 100+ points staff level approval

There have been a total of 29 applications to build projects in the TSA zoning district since it was adopted in 2011. One project was cancelled and one project included only a small addition and was not required to go through the review process. Of those that have been reviewed, the average development score is 117. Only two projects have failed to reach Tier 3. Both of those projects were approved at administrative public hearings.

In terms of implementing the City's housing goals, specifically affordability, the projects in the TSA have contributed to the total number of affordable units in the City. Most of this contribution is not necessarily due to the TSA zoning requirements, but rather due to other market forces. The TSA zoning district has enabled new housing to be constructed by not placing a density limit on projects and having a relatively quick approval process. Increasing the number of affordable units being constructed would require more resources and tools to incentivize the construction of affordable units and to maintain existing units. Inclusionary zoning (requiring a certain number of units in each residential development to be affordable) is the most commonly used zoning tool related to affordable housing. Inclusionary zoning is a controversial tool and has produced mixed results in cities that have adopted inclusionary zoning policies. Whether inclusionary zoning will work in Salt Lake City requires advanced research and market studies prior to drafting an ordinance.

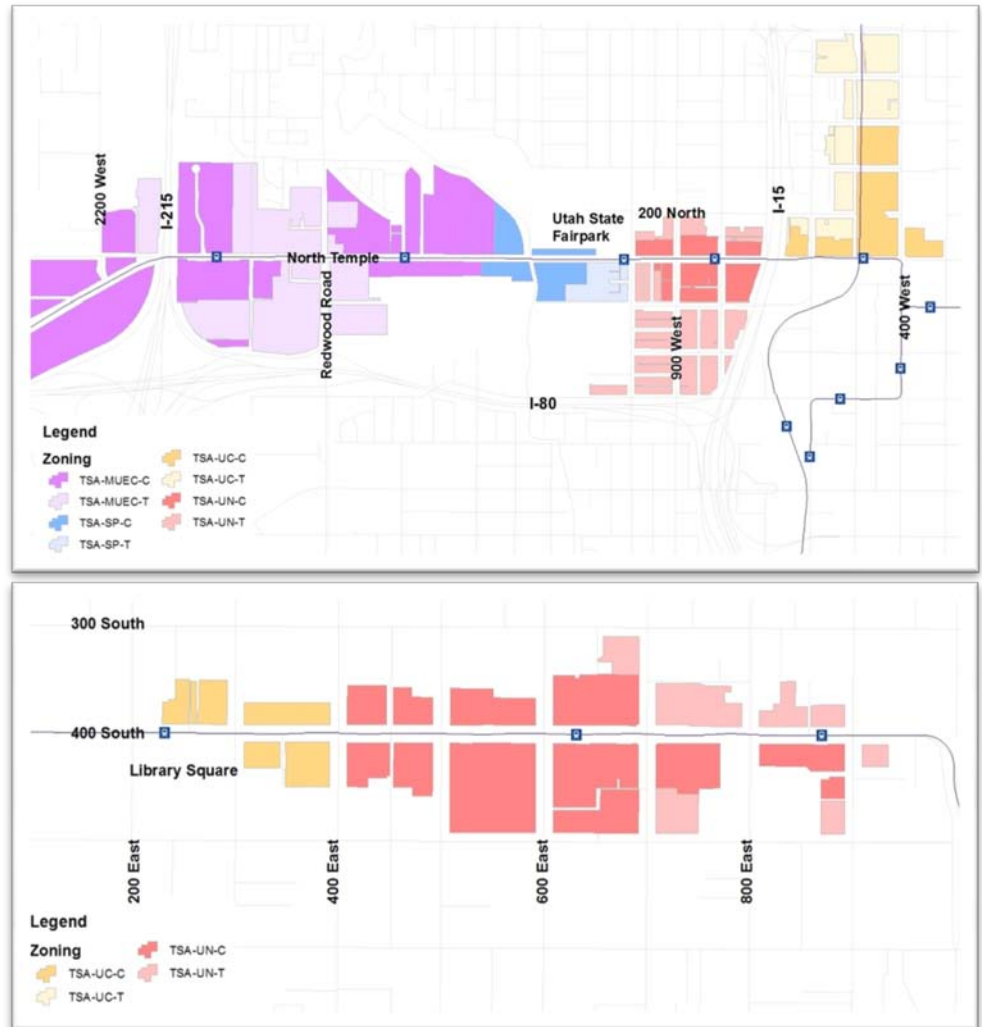
After reviewing the ordinance, guidelines, and projects that have gone through the process, the Planning Division has identified the following improvements:

- Switch from a table of prohibited uses to a table of permitted uses to increase comfort from the lending community, developers, and neighborhoods so that it is more clear what types of land uses are possible.
- Modify standards relating to building mass and scale, building materials, and make fine tuning types of adjustments to sections of the ordinance that are not as clear as they could be.
- Review the point system and adjust the tiers (if necessary) so that only the highest quality projects are eligible for administrative approvals and consider whether projects over a certain size should be reviewed by the Planning Commission.
- Review individual guidelines and make necessary adjustments to those guidelines that are not used and adjust the point values of some guidelines if necessary.
- Work with other City Departments to identify the most appropriate tools and regulations to further incentivize affordable housing. In order to prevent concentrating affordable housing along single corridors, this should be considered citywide and involve multiple zoning districts, not just the TSA zone.

History and location of TSA zoning district

The TSA zoning district was developed in 2011 specifically for the North Temple area to help implement the North Temple Boulevard Master Plan. This plan is the land use plan for the corridor, stretching from around 400 West to 2200 West. The TSA zone has 4 sub districts. The sub districts were created due to the unique nature of the corridor, including a dense urban core around 400 West, a low intensity neighborhood with development opportunity along North Temple and south of North Temple from I-15 to 1000 West, the Utah State Fairpark and surrounding office complexes, to the industrial area west of Redwood Road.

In 2012, a planning process was started to determine if the TSA zone was appropriate for the 400 South corridor. Although light rail opened in 2001 and transit oriented development being mapped along portions of the corridor in 2005, little private investment had been made along the corridor and the corridor retained its auto oriented characteristics. The end result of this process was applying the TSA zoning district from approximately 200 East to 900 East along 400 South. The Central Community Master Plan was modified as well to be more supportive of transit oriented and people oriented development along and near the corridor.



Both processes included an extensive public outreach effort, both of which focused on reaching out to groups who do not normally participate in the planning process. This was a critical component of the process because at the time community input was more reactionary in nature and occurred in response to proposed development. Part of the goal of creating the TSA zone was to better reflect the vision for each corridor so that it was clearer what could be expected out of future development.

HOW THE TSA ZONING DISTRICT WORKS

The TSA zoning district is a hybrid zoning district that incorporates concepts from different types of zoning codes. It is mostly modeled after performance based zoning and form based zoning. A performance based zoning model is one where certain goals are set and a development is judged on how well those goals are met. For example, one of the goals in the applicable master plans is to increase housing density around light rail stations. The corresponding performance measure is based on the number of dwellings per acre. Performance based zoning is all about setting goals, providing options on how to meet the goals, and not worrying about which options are used. The TSA zoning district incorporates some form based code principles, such as placing more intense development near the transit station and having the form of development decrease in scale as the distance from the station increases. It also establishes the basic form of buildings, where buildings are placed on a lot, and typically includes specific design standards. In the case of the TSA district, the zoning standards are form based, while the approval process is performance based.

The design standards in the TSA zoning district regulate building height, setbacks, parking, landscaping, signs, and other things typically found in other zoning districts. These standards vary based on the sub district and the distance from a transit station. The areas closer to a station are called “core areas” and those further away are called “transition areas.” The core area requirements are more flexible and permissive in nature. The transition is more rigid and more restrictive because transition areas tend to be next to low intensity or low density neighborhood uses.

The TSA zone includes design standards that are more focused on how a building relates to the street or public spaces and less concerned what happens on the backs or to the sides of buildings. Things like ground floor building materials, entrance location, glass requirements, pedestrian oriented signs, open space, and other similar features are required for all projects.

When the TSA zone was drafted, the approach to regulating land uses took on a different look. The idea was to list only those things that were not appropriate instead of specifically listing those land uses that were allowed. This was a new approach for the City, which has historically used tables of permitted and conditional uses.

Perhaps the most unique aspect of the TSA zone is the approval process. A performance based approach was used because there were so many goals that were identified during the planning process that it would be difficult and unrealistic to accomplish all of these goals. To ensure that at least some of the goals were accomplished in an incremental manner, the development guidelines were created. Due to the level of public outreach, it was not difficult to determine what was important. The challenging aspect was determining how to determine whether enough of the guidelines were incorporated. The solution was to assign a point value to each guideline. The point value was based on the cost to include the guideline, the level of desirability, and importance of achieving the goals. Expensive or challenging things that also are critical to achieving the goals of the master plans were assigned high values (up to 50 points) while simple, low cost things, such as providing benches have low values (2 points).

The ordinance establishes three tiers for reviews. Each tier is based on the total points accumulated, called a development score. For those projects that are in Tier 1 or Tier 2, the ordinance requires the approval process to follow the Conditional Building and Site Design Review process, with the only difference being Tier 1 is reviewed by the Planning Commission and Tier 2 is reviewed at an Administrative Hearing that includes a public hearing. It should be noted that a developer can choose to not incorporate any of the guidelines. In this case, the development score would

Review Process

Tier	Approval Process	Estimated Time Frame*
Tier 1 Projects with a development score less than 50 points	Planning Commission	3-6 months
Tier 2 Projects with a development score between 50 and 99 points	Administrative Hearing	1-3 months
Tier 3 Projects with a development score more than 100 points	Administrative Review	No additional time required after Development Score

* The timeframes are estimates. Variables such as an incomplete application, lack of information, time until next available community council meeting or public hearing, and appeals may affect the estimated time frame for approval.

be zero and the item would be reviewed by the Planning Commission through the Conditional Building and Site Design Review process. In many cases, this is not much different than how approvals are required for permitted and conditional uses. For a permitted use, a developer submits a building permit and once the plans show that they meet building code and all zoning requirements, a permit is issued and construction starts. Neighbors often do not know a project is going to happen until construction starts. Less than 10% of all building permits issued require a review by the Planning Division. Most of those that do are reviewed at a staff level and usually include historic review, special exceptions or administrative conditional uses. A total of 29 applications have been submitted since 2011 for a TSA review, with 27 completed or currently in the works. Only two of those 27 were not eligible for an administrative review.

Development in the TSA Zoning District

Development in the TSA zoning district has consisted of both residential and nonresidential development. Residential development is generally described by the number of dwelling units while nonresidential development is described by square feet of floor space.

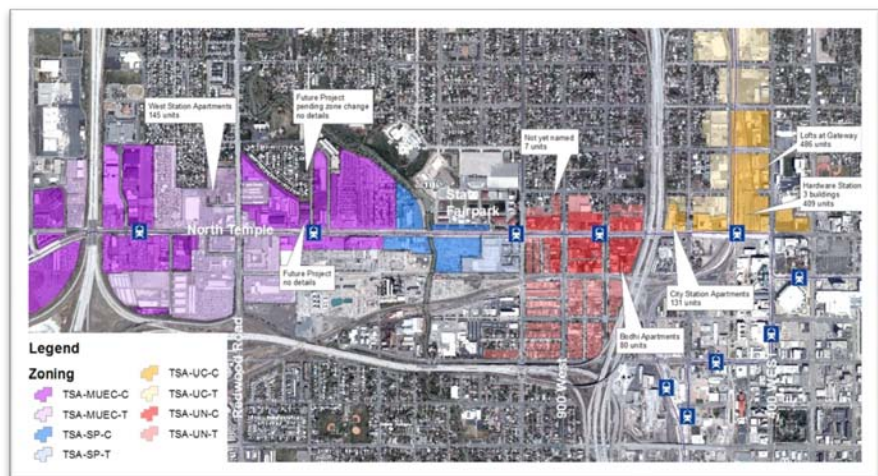
North Temple projects

Project	Address	# of dwelling units	Affordable units	Square feet	Parking stalls	Sub district
Biomat USA	630 West North Temple			12,735	25	UC-C
Apollo Burger	143 North Redwood Road			4,975	38	MUEC-T
Signature Books	508 North 400 West					UC-T
City Station Apartments	664 West North Temple	131			149	UC-C
Family Dollar	50 North 900 West			8,341	30	UN-C
Signature Books/Guadalupe Cafe	543 West 400 North	5		2,807	9	UN-T
Tri-plex	164 South Jeremy Street	3			3	UN-T
West Station Apartments	167 North Harold Street	145			212	
The Lofts at Gateway	411 West 300 North	486			643	UC-C
Red Iguana 2 expansion	866 West South Temple			16,854	58	UN-C
Single Family Dwelling	926 West Euclid Ave	1			2	UN-T
Not yet named	909 West 200 North	7			2	UN-T
Hardware Station (3 buildings)	155 North 400 West	409		283,268	1,000	UC-C
Bodhi Apartments	750 West South Temple	80	60		46	UN-C
Totals		1,267	60	328,980	2,236	

Legend:

- Non-highlighted text: Projects where no building permit has been submitted
- Yellow highlight: in building permit or construction process
- Green highlight: finished projects

Along the North Temple corridor, a total of 1,267 housing units have been proposed and 284 completed. There has been one mixed income project has included units that are targeted to various levels of affordability. Most of the nonresidential construction has been relatively small buildings. The Hardware Station project is a large project located just west and north of the Salt Lake Hardware Building. This project is a mixed use project that will consist of three buildings, two new streets and the continuation of 500 West under the North Temple viaduct. One of the buildings will have direct access to the Guadalupe Trax station that is located on top of the North Temple viaduct.



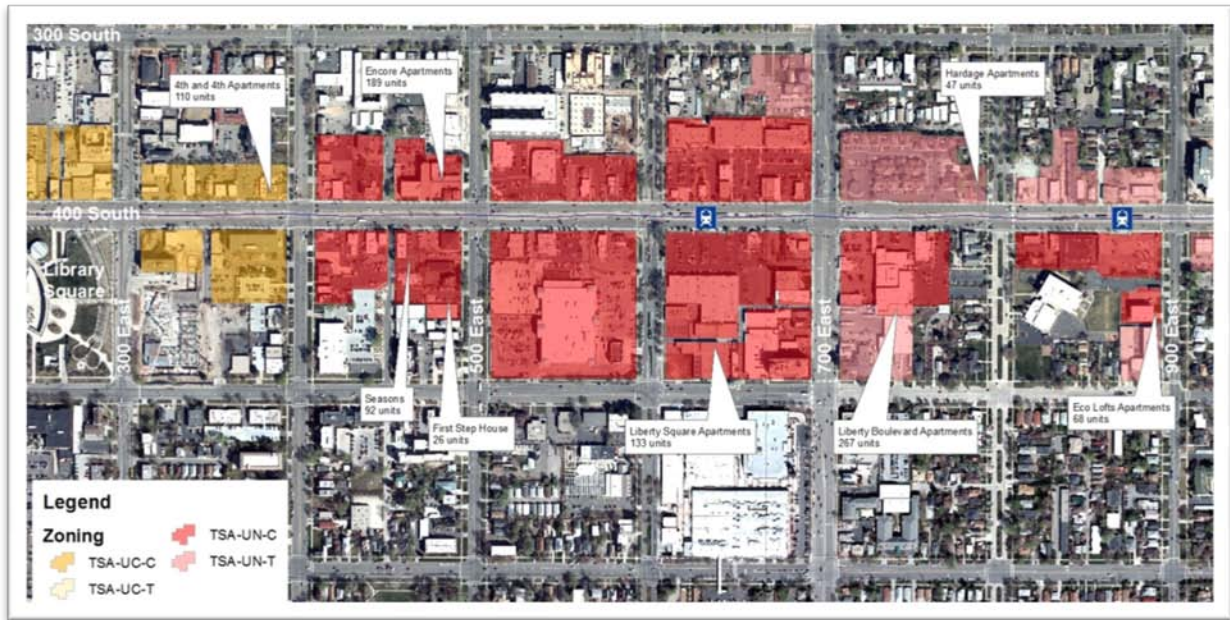
400 South Projects

Project	Address	# of dwelling units	Affordable units	Square feet	Parking stalls	Sub district
7-11	887 East 400 South			2,670	8	UN-T
Utah Pride Center	255 East 400 South			9,000	41	UC-C
First Step House	440 South 500 East	26	26		43	UN-C
Seasons on the Boulevard	448 East 400 South	92			92	UN-C
Hardage Apartments	775 East 400 South	47			54	UN-T
Encore Apartments	455 East 400 South	189			193	UN-C
4 th and 4 th Apartments	371 East 400 South	110		1,935	110	UN-C
Liberty Square	461 South 600 East	133	TBD		TBD	
Liberty Boulevard	734 East 400 South	267	26	3,990	363	UN-C and UN-T
Eco Lofts	444 South 900 East	68	54	1,325	24	UN-C
Totals		932	106	18,920	928	

Legend:

- Non-highlighted text: Projects where no building permit has been submitted
- Yellow highlight: in building permit or construction process
- Green highlight: finished projects

The projects along 400 South tend to be distributed throughout the corridor. Most of the projects are primarily residential in nature with 4 of the major projects being mixed use with ground floor commercial space.



Housing in the TSA zoning district

Approximately 2,199 housing units have been proposed in the TSA zoning district. A total of 586 dwelling units have been built and 1,230 are under construction or in the permit process. There have been 166 affordable dwelling units proposed, under construction, or built to date. This represents 7.5% of the total housing units. Units that have been identified as affordable are those units that have some sort of funding source that is tied to housing affordability. What is considered affordable varies. For the purpose of this report, only those units that have specifically been identified as affordable are counted. The units identified as affordable are located along both corridors, with 106 units located along 400 South and 60 units along North Temple. All of the known affordable units are located in 4 buildings: Bodhi Apartments, Eco Lofts, Liberty Boulevard, and First Step House. Eco Lofts and Liberty Boulevard are separated by one city block. The Planning Division has not reviewed other affordable housing locations as part of this review to determine if a concentration of affordable housing is located along either corridor and at what levels of affordability that may exist along the corridor. The following table lists a sample of lease rates of currently available units at a few of the apartment buildings along each corridor:

Location	Studio	1 bedroom	2 bedroom	3 bedroom
City Station Apartments 644 West North Temple		\$909-1389	\$1099-1618	\$1640-2099
West Station Apartments 167 North Harold		\$785-935	\$1125-1235	
Encore Apartments 455 East 400 South	\$1174-1224	\$1324-1539	\$1699-1899	

Lease rates shown are what was available on the projects website

The new housing consists of a mix of sizes, but it is unknown the full mix in terms of number of bedrooms. Calculating this number would require a review of building permit plans and Planning staff has not had the time to do this as of yet.

The City has a number of adopted policies that impact housing development. The overall goals of the City include:

- Locate housing along transportation corridors and in places that have the infrastructure in place to support it;
- Disperse affordable housing citywide;
- Increase the housing supply;
- Provide housing options that includes a mix of housing costs, housing types, and housing locations.

The TSA zoning district provides the framework to accomplish each of these goals. The district is mapped along corridors that include transit and auto access. North Temple also provides on street bike lanes and a wide sidewalk that was designed to accommodate bicycles. Other bicycle routes intersect the corridors. Future bicycle routes are planned to help make transit more accessible. Future routes include a mix of infrastructure improvements designed to make bike paths safer and more comfortable for riders with a wide range of abilities and comfort level.

Density in the TSA zoning district is regulated by building height. This allows the greatest flexibility for housing development. The premise behind this is to not artificially limit density. Limiting density is a factor in housing costs because it limits supply. The TSA zoning district is also intended to reduce the demand on nearby neighborhoods where density increases are not supported. This allows for an overall increase in housing supply citywide.

The TSA zoning district allows a variety of housing types depending on the subdistrict. Single family and two family dwellings are permitted in transition zones, but not in core areas. All other housing types are permitted in both transition and core areas.

The Zoning Ordinance does not require new housing developments to include affordable housing. The TSA zoning district offers an incentive through the development guidelines for projects that provide some affordable housing. The City's Housing and Neighborhood Development Division is currently investigating a number of

tools to help address housing affordability. Part of that process will be a review of zoning regulations to determine what types of approaches are appropriate to help improve housing affordability.

Zoning Issues

The TSA zoning district has helped achieve the City's overall goals of increasing housing supply and focusing growth along transit corridors. However a number of issues have been identified over the years as projects have gone through the process. The issues range from relatively minor in nature (fine tuning types of issues) to more broad in nature.

Noticing

Perhaps the broadest issue deals with the approval process. Some projects that have been approved administratively have come as a surprise to some people, as they do not find out about a project until construction starts or a construction sign goes up. This concern mostly relates to the scale and mass of buildings and the impact to immediate neighbors. There have been a few concerns with some of the uses, such as the First Step House Recovery Campus located at 440 South 500 East. This facility provides a full service recovery campus with social services and housing for veterans. The primary concern was that this type of use is too prevalent in the Central City neighborhoods, even though this facility was simply relocating from an existing site in the same neighborhood. Other issues identified that are related to the approval process include:

- Increase in traffic and congestion
- No notice of new projects
- Larger projects should have to notify the neighbors
- Impact of taller buildings on open space, primarily due to shading

Projects that don't meet the top tier would be noticed as a public hearing, which includes posting of the property and mailing notices to neighbors within 300 feet. Recognized Organizations are sent email notice of public hearings.

Applicants have indicated that they like the approval process in the TSA zoning district because it provides predictability and clear outcomes. This is an important consideration for any zoning ordinance and approval process.

The Planning Division does not support wholesale changes to the approval process. However, we could require notice be sent to neighbors that lets them know an application has been submitted, what the process is, and how they can find out more. Technically, the determination of the development score is an administrative decision that can be appealed. Neighbors currently can appeal these decisions, but because they are not readily available and no notice is sent. It would be difficult for neighbors to know that a development score has been calculated and the review process determined. If changes are considered, the predictability of the process should remain. If the City decides to start providing notices, it should be clear that it is simply to provide them with info and that the recourse for those that have issues with a project is to appeal a development score. A project that falls under the review of the Planning Commission or Administrative Hearing Officer would be subject to review under the Conditional Building and Site Design Review process, where design related issues may be discussed.

Land Uses

The TSA zoning district uses a table of prohibited uses for each of the sub districts. This has created some confusion, primarily with the lending community who seeks some sort of assurance that a land use is allowed in the zone. Often times the result is a lender submitting an application for a zoning verification or administrative interpretation that may not have been necessary if a table or permitted and conditional uses were used. Currently, there are no conditional uses. Changing the table to permitted and conditional uses makes the TSA zone more consistent with other zoning districts, which makes the ordinance easier to administer and more user friendly. It also may cut down (slightly) on staff work being allocated towards zoning letters and interpretations.

Building Scale

A number of the higher profile developments in the TSA zoning district have very large footprints and cover a lot of land. Larger buildings are more difficult to design with pedestrian orientation in mind. For example, it is difficult for an apartment building to place dwelling units on the ground floor of 400 South due to the impacts of the street and the buildings often do not have a lot of common areas within the building to fully activate the sidewalk. With the added difficulty of financing and constructing mixed use developments, these projects end up with very long walls along their street frontage of larger lots that are not pedestrian friendly. Recently, the Planning Division has been working on addressing the same issue along the S Line. The council gave the direction to limit the length of



Larger buildings have a bigger impact on the streetscape.

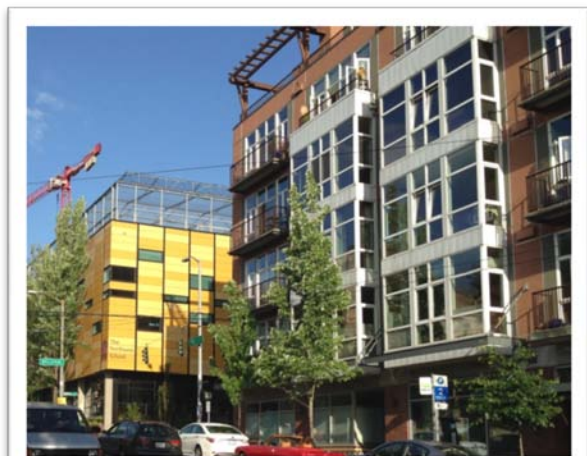
any street facing building wall to 200 feet. The intent is to avoid the issues that are arising along 400 South. This kind of restriction would essentially mean that parcels with frontage over 200 feet would not be able to occupy the entire frontage. This regulation may also discourage the consolidation of smaller lots into much larger lots. Other potential considerations may include maximum lot sizes to discourage lot consolidations and lot coverage restrictions. Lot coverage restrictions may result in limiting development potential, which could have a negative impact on density and housing affordability. The overall goal would be to produce a more human scale massing, which may be accomplished in a number of different ways.

Ground floor uses

Most of the projects that have been constructed or approved in the TSA zone are typically single use structures. There is a standard requiring ground floor use, however it is written in a way that allows some interpretation and the ordinance should be clarified to reflect the intent to have active ground floor uses. Over the years, the City has made similar changes to other zoning districts so this is likely more of fine tuning type of change than a major change. However, it should be noted that there has not been a lot of true mixed use development in the City and this regulation requiring such may make investors and developers look elsewhere. It should also be noted that some developments on properties that have multiple frontages may find it more challenging to provide active uses on the entire ground floor of all frontages. This should not deter the City from clarifying this requirement however.

Building Materials

One of the primary purposes of regulating building materials is to create long lasting buildings that require less long term maintenance than a building that uses less durable materials. Building materials also contribute to the overall design quality of the building. The ordinance regulates ground floor building materials, but not upper level materials. On larger projects, this often results in large expanses of walls that lack defining character. While they often have windows and balconies, this does not seem like it is addressing some of the public concerns about building quality and architecture. While largely a subjective issue, some form based codes are requiring a certain percentage of



These buildings use exterior materials that are not currently allowed as a primary building material in the TSA zone.

building materials on upper levels to be something other than stucco.

The other issue associated with building materials is that the list of approved materials is short and only includes brick, masonry, textured or patterned concrete, and/or cut stone. Some developers have indicated that there are a number of different materials that are high quality and meet the objective of the regulation, but are not specifically allowed. They have suggested that other building materials, such as metal, be either listed as approved materials or that a process be established to approve other materials administratively provided it can be demonstrated that the product has been used in our environment and meets the objective. Some have suggested banning the use of EIFS, which is a brand name for insulated, exterior stucco like material commonly used.

Setbacks

The ordinance only requires side and rear yard setbacks when adjacent to other zoning districts. The intent was to provide flexibility for property owners and developers. However, some have complained that it pushes larger buildings next to the property line and creates separation issues. This is related to the building code, which requires some setback from property lines for walls that have windows and doors. This issue also could result in long street walls that are not interrupted by a separation of buildings. It discourages and may make it impossible to provide mid block walkways if there is not space between buildings. This is an important consideration given the City's large block sizes, particularly in locations where there are no adopted policies or regulations that require midblock walkways.

Development Guideline Issues

Issues associated with the guidelines are primarily related to the approval process. There are some who think that either the top tier threshold should be increased or the assigned values decreased. To help understand the issues with the guidelines, staff reviewed all of the development score checklists to determine how often standards are used, if certain guidelines are being used by only one type of development, and if there are any issues with how the guidelines are worded.

There are 29 total guidelines in the following categories:

- Land Use (8 guidelines, 25 different ways to accumulate points)
- Building and Site Design (11 guidelines, 29 different ways to accumulate points)
- Public Spaces (3 guidelines with 10 different ways to accumulate points)
- Circulation (4 guidelines with 8 different ways to accumulate points)
- Parking (3 different guidelines, with 10 different ways to accumulate points)

The projects have ranged in scale from a single family home to 500 unit apartment buildings and a recent project that includes 10 acres of land, three new buildings, and two new streets.

A checklist showing which guidelines are being used is required to be submitted with an application. An application that does not include this will be given a score of zero and told they have to go through the Planning Commission for approval. Staff reviews the submitted plans and the checklist to verify if the guideline has indeed been met. If a guideline is used, but not enough information is provided or they don't meet the guideline, it is not counted towards the final score. For example, providing midblock walkways have been identified on four applications, but none of the four were given points for providing a mid block walkway. Once tabulated, a letter is sent to the applicant informing them of their score. If they do not score above 100 points, they are given the opportunity to modify their plans to address additional guidelines before the score being finalized. The applicant can appeal the development score. Most applications do have some claimed guideline that they do not actually meet.

Some guidelines are used more than others. The following chart shows how frequently (by %) a guideline has been used based on the 27 reviewed applications. The percentage does not take into account guidelines that have been claimed but not counted upon staff review.

Guideline	% of time used
Architectural detailing on all 4 sides of the building	55%
Operable openings, balconies, verandas, etc facing a sidewalk	55%
Lighting that help illuminate the sidewalk	52%
Street facing facades that is clad in durable, high quality materials	48%
Provided bicycle amenities	44%
A pitched, arched, or similar roof shape	41%
A project with a residential density over 50 DU/acre	41%
Water wise landscaping that also reduces heat island effect	37%
A new building that meets zoning that replaces a building that does not meet zoning	33%
A new building where 100% of the parking is structured or 75% of parking is underground	33%
Redevelopment of an existing surface parking lot where at least 50% of the surface parking is replaced by building	30%

When identifying issues, it is important to consider what types of projects are using which guidelines. The Architectural detailing guideline (20 points) is primarily used by smaller commercial projects, such as the 7-11

on the corner of 400 South and 900 East, and single family dwellings. The building materials guideline for street facing facades (used on 48% of projects, worth 15 points) is also mostly used by smaller projects. Some of the guidelines have since been incorporated into zoning regulations. This includes bicycle parking and water-wise landscaping. In these instances, the guideline should be reviewed to determine if the goal is to go above and beyond what the zoning standard says or if it warrants removal of the guideline. There may be other issues that were not included in the guidelines that the Commission may want to consider adding.

The biggest value guidelines include:

- Green building designs (20-50 points depending on level) has not been used
- Energy producing buildings (up to 50 points) has not been used
- Projects reviewed by the Historic Landmark Commission (50 points) one project is going through this process.
- Placing a structure on the local registry (50 points) has not been used
- 100% of parking is structured above ground or 75% below ground (50 points) used 33% of the time, mostly on large projects and single family homes.
- 75% of the parking is structured above ground or 50% underground (40 points) used 18% of the time.
- 33% or more of the dwelling units are affordable (30 points) used 2 times.

Parking Guidelines

Structured parking is the only guideline with a value over 25 points that has been used on a regular basis. This is one guideline that some people believe has too high of a value. The original value was set high to encourage structured parking over surface parking primarily due to the large amount of land that is occupied by surface parking and the associated impacts of large surface parking lots. The standards in the ordinance prohibit surface parking lots in between the sidewalk and building, and require parking to be behind or to the side of building. Structured parking is not required by the ordinance.



Most housing projects incorporate structured parking, typically integrated into the structure.

One of the surprising facts about the parking guideline is that it has been used by every single family dwelling processed in the TSA zone because they all have a garage. Without this standard it is very difficult for single family dwellings to reach the top tier. Single family dwellings are permitted in the transition zones of some of the TSA districts and new single family dwellings have been proposed in the Euclid neighborhood, where a mix of housing types exists and is desirable. Staff does not support changing this guideline.

Building Material Guidelines

The primary difference between the building material standard and the building guideline is that the standard relates only to the ground floor, where the guideline applies to the entire street facing façade with increased points for providing on other building facades as well. Similar to the building material standard in the ordinance, the guideline has a limited list of building materials. A similar approach should be taken with this guideline to provide some way for applicants to identify other building materials that meet the objective.



Smaller structures tend to incorporate durable building materials on a larger portion of the building.

Affordable Housing Guideline

This guideline for affordable housing has only been used twice. This standard includes 3 different options, 30 points for 33% or more of the units being affordable, 15 points 20-33% are affordable, and 10 points if 10% of the units are affordable. Given that zoning has limited options for providing incentives, these point values should be reviewed to see if providing affordable housing can be further incentivized. One caution to this is that if it does incentivize more affordable housing, the provided housing will be concentrated in two parts of the City: along North Temple and along 400 South. While both of these streets have the ability to provide more housing and transportation options, concentrating

affordable housing in some parts of the city is likely to draw criticism from some neighborhoods. However, locating affordable housing near transit also has the potential to reduce household transportation costs.

Green Buildings

Energy efficiency and green building is concerning because in the next 10 years, 40% of the air pollution generated in the valley, according to some reports, will be generated by buildings. One change that may help this is to switch the green building standard to use the LEED® system. This system was not used originally because it did not match up with the City's building permit process. For example, an applicant could claim they were going to build to LEED® silver, get their building permit, but never certify their building. The City would have little recourse if a building passes all inspections and is built to code but not certified by the US Green Building Council. Since this ordinance was adopted, the pre-certification process has been improved by the US Green Building Council and pre-certification may be sufficient enough to satisfy the intent. The other key issue is that Utah has not adopted the most recent energy code. This means that the City cannot require new buildings to comply with a higher standard of energy conservation in building design. The other benefit of utilizing LEED® is that it also qualifies an applicant for an expedited building permit review, which could be seen as an additional incentive.

List of possible modifications

The below list summarizes the various changes that could be further analyzed and considered to improve the function and outcomes of the TSA zoning district. It should be noted that further analysis and processing changes to the TSA zoning district and development guidelines requires a commitment of staff resources. The Planning Division is currently prioritizing a number of different projects aimed at improving processes and clarifying regulations. A timeline for processing changes to the TSA zoning district would be considered as part of the bigger picture in terms of resource allocation and achieving the City's goals of improving processes and clarifying regulations.

1. Replace table of prohibited uses with a table of permitted uses
2. Require notification of application be sent to neighbors
3. Clarify ground floor uses and that parking is required to be placed behind a permitted land use
4. Update building material requirements
5. Address building scale issues
6. Review rear and side yard setbacks
7. Consider requirements for midblock walkways
8. Adjust development score thresholds
9. Modify development guidelines