



MEMORANDUM

PLANNING DIVISION
DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: Salt Lake City Planning Commission

From: Ashley Scarff, (801) 535-7660, ashley.scarff@slcgov.com

Date: November 14, 2018

Re: PLNPCM2018-00066 Single Room Occupancy (SRO) Text Amendments

The purpose of this memorandum is to make refined recommendations related to the proposed SRO Text Amendments (PLNPCM2018-00066), as requested by the Planning Commission at the July 11, 2018 meeting. The Planning Commission shall review the information contained in this memo and make a recommendation for the City Council's future consideration.

BACKGROUND:

The Mayor formally requested that the Salt Lake City Planning Division amend sections of the Zoning Ordinance to better define SRO housing, and determine appropriate locations within the City for this use. The intent of the proposed amendments is to implement elements of the recently-adopted [*Growing SLC: A Five Year Housing Plan \(2018-2022\)*](#).

This petition was initially presented to the Planning Commission at a public hearing held on **June 27, 2018**. At that time, the Commission tabled the item in order to give staff time to research four specific topics.

Staff addressed the four topics at the **July 11, 2018** meeting, but the Commission again made a motion to table the item, with a request for Staff to investigate additional areas of concern/interest (detailed in the sections below). The Commissioners also moved to reopen the public hearing for this item. The agenda, staff report, record of decision, and minutes from both of these meetings can be found at <https://www.slc.gov/boards/planning-commission-agendas-minutes/>.

CONCERNS FROM PRIOR MEETINGS & RESPONSES:

During the July 11, 2018 Planning Commission meeting, Commissioners tabled the item to a future date and directed Staff to return with refined recommendations that would address multiple areas of concern identified in the motion. In recent months, Staff has conducted further due diligence with more research, meetings with local housing stakeholders, and a tour of the Rio Grande Hotel, the only known true SRO still in operation in Salt Lake City today. Staff has considered each of the Commissioners' concerns, and has responded with further amendments to the ordinance, or explanations of the rationale behind why the suggestions weren't incorporated into the proposal, below:

Amendment to proposed definition

Staff has updated the proposed definition of SRO to directly address permitted lease lengths and the maximum occupancy of each unit (full definition in [Attachment A](#)).

- This updated proposal removes the “dwelling” designation from the SRO use in order to allow for the weekly rental of units. The ordinance defines “dwelling” as a residential use that is meant to be occupied on a monthly basis. Staff finds that a weekly rental option is important for this type of use, as it will **1)** allow those who cannot afford a full month’s rent to procure shelter with smaller payments, and **2)** provides management with the ability to immediately evict tenants who aren’t following the rules, without waiting until the tenant’s month-long lease period ends. The manager of the Rio Grande Hotel stressed that this flexibility is imperative to successful management.
- The latest definition also indicates that the individual units shall house a maximum of 1-2 tenants. This occupancy standard, paired with proposed minimum floor areas (outlined below), should address multiple concerns that have been brought up at past meetings.

Floor area of individual sleeping rooms

Past SRO text amendment proposals did not recommend imposing minimum required floor areas for the individual units, and Commissioners expressed concerns with leaving this detail up to minimum building code requirements as it could result in inadequate living conditions for future tenants of SRO developments. Staff is proposing to create section 21A.36.360 “Qualifying Provisions for the Single Room Occupancy (SRO) Use,” which includes a minimum floor area standard that would require each unit to contain a minimum of 150 square feet of floor area for a single tenant, or 200 square feet of floor area for two (2) tenants. This would not include the area of a private bathroom (if included), closet/storage or mechanical areas.

Floor area of common/communal areas

In addition to minimum floor area requirements for the individual SRO units, Staff is proposing a standard that would require that the total amount of communal area have a floor area that is a minimum of 15% of the total floor area of all individual units. This would include, but is not limited to libraries, lounges, recreation rooms, dining rooms, laundry rooms, and meeting rooms that are accessible to all residents of the SRO with sufficient accommodations provided for socializing and meeting.

Shared kitchen and bathrooms

Past meetings saw comments and questions regarding the concept of shared kitchen and bathroom amenities in SRO establishments. While Staff has not made any changes to the original proposal, more insight can be provided on this topic.

The proposed definition of SRO states that *“Each individual unit consists of one combined living and sleeping room and may contain either a private kitchen or separate private bathroom, but not both. Whichever amenities are not contained within the individual unit (the kitchen, bathroom, or both) shall be provided as a common facility within the same building, to be shared with the tenants of other SRO units.”* In other words, the definition does not attempt to prescribe what makes up a kitchen or bathroom, but indicates that an SRO unit shall not be self-contained, and amenities required by building code but not included within the individual unit shall be located elsewhere in the same building as a shared amenity.

Planning Staff consulted Building Services Staff in an attempt to clarify the ratios that would be used to calculate required kitchen and bathroom amenities, but found that it will likely be considered on a case by case basis for the following reason:

- Because Staff is now proposing to remove the “dwelling” designation from the SRO use to allow for the weekly rental of SRO units, the use is considered a “transient” use as far as the building code is concerned. Uses with a transient designation have much higher ratios for plumbing amenities, which Building Services Staff acknowledges is an issue. For example, *Hotels, motels, boarding houses (transient)* require one (1) toilet per sleeping room, while *Dormitories, fraternities, sororities and boarding houses (non transient)* have a ratio of 1 toilet per 10 tenants.¹ Building Staff indicated that there is a code change committee working to accommodate a transient use such as a hostel or SRO with more reasonable ratios, but until those amendments are made, Building Services Staff will consider each project and its needs on a case by case basis.

The International Building Code (IBC) is described as “*a model code that provides minimum requirements to safeguard the public health, safety and general welfare of the occupants of new and existing buildings and structures.*”² Planning Staff does not feel that it’s necessary to define the specific elements that make up a kitchen or bathroom, as enforcement of the building code will ensure that adequate facilities are provided. In addition, until the building codes are updated with more realistic plumbing ratios for transient hostels or SROs, these projects will receive individual attention and consideration by Building Services Staff, who will determine appropriate requirements.

Property Management

After hearing the Commissioners’ concerns regarding the management of SROs and conducting further research into the issue, Staff amended the proposal to include qualifying provisions that require a property manager to be on site 24 hours a day, who would be responsible for the conduct, operation, and maintenance of the SRO, as well as the continuous monitoring by security cameras of all communal areas that are accessible to all tenants. The proposed definition includes language that allows for a management office, as well as one self-contained living unit with private kitchen and bathroom amenities for a caretaker or manager. Staff finds that these provisions are adequate to ensure the proper management of an SRO use.

Impacts on immediate neighborhood

Commissioners have brought up concerns about potential negative impacts that the SRO use could have on a surrounding neighborhood; specifically, on single family neighborhoods. Researching this topic is tough, as SROs have been in existence since the early 1900s, and tend to have a negative connotation for many reasons. For example, the deinstitutionalization of mental health facilities in the United States resulted in the exodus of patients to the streets, with many ending up in SRO establishments, which were originally developed as a way to house temporary workers or even young adults in the pre-WWII days when city living was still a desirable option. Over time, the SRO became associated with the poor, addicted, criminal, mentally challenged, etc. For this reason, a search for information (even peer-reviewed) regarding negative impacts associated with SROs will result in a plethora of dated articles that reference the type of establishments that have gone unregulated for decades. There is very little recent information available regarding the regulation and construction of new SRO-style developments, or reports on their success within a community.

The staff report from July 11 contains a section (Findings, Item 3) that covers the proposed proximity to single family districts, and includes a set of maps that illustrate where Staff has proposed to permit the SRO use, paired with the locations of single and two family zoning districts (included in this report as [Attachment B](#)). The analysis resulted in the following conclusions:

¹ See https://codes.iccsafe.org/content/IBC2018/chapter-29-plumbing-systems?site_type=public

² See https://codes.iccsafe.org/public/document/code/369/6464506?code_id=6464506

- With the exception of the Downtown districts, all of the zoning districts proposed to permit the SRO use are at some point adjacent to a single or two family residential district.
 - However, this contact generally occurs at the perimeter of single or two family neighborhoods – the neighborhoods, themselves, are fairly homogenous, meaning that there would be little to no opportunity for the SRO use to be located within them.
- Zoning districts where the SRO use could be permitted occupy 9% of the ‘developable’ land area of the city.

Staff is proposing to permit the SRO use in mixed-use zoning districts that do not have density limitations. These are the zoning districts that permit the type of housing that can make an impact on Salt Lake City’s housing crisis; however, they only make up approximately 9% of the developable area of the city. Staff continues to find the original location proposal appropriate, even when the proximity to single and two family zoning districts is considered.

Proximity to Public Transit

The zoning districts proposed to permit the SRO use were selected using four (4) location criteria:

- Districts with existing design standards in place;
- Districts that already permit uses with similar characteristics/levels of intensity;
- **Districts that typically have close proximity to frequent public transit;**
- **Districts that permit/are typically located near a mix of uses to enable accessibility to employment or other amenities by foot or bicycle.**

Staff finds that locating any type of residential use in walkable environments that are near frequent public transit routes should always be a priority, but agrees with sentiments expressed by the Commissioners that it should be an even higher priority for the SRO use, as the use does have a reduced parking requirement, and tenants may not have personal vehicles.

In an attempt to illustrate how this was prioritized, Staff prepared a map that includes the zoning districts where SROs would be a permitted use, as well as the available data set for bus routes with 15, 20, and 30 minute frequencies, and fixed rail lines, which have 15 minute frequencies with the exception of the S-Line, which has 20-minute frequencies ([Attachment C](#)). As can be seen in this map, the areas proposed to permit the use are well-served by bus and rail, with the exception of the 5600 West corridor, which is included because it is zoned CG General Commercial. Staff finds that the Commissioners’ request to permit the use near frequent public transit corridors has been met through this proposal, and maintains the same recommendation presented in past meetings.

Permitted vs. Conditional Use

At the July 11 Planning Commission meeting, Commissioners expressed interest in making the SRO a conditional use rather than a permitted use, as it would require special review of these projects on a case by case basis by the Planning Commission, who could apply specific conditions to a project, if needed. Planning Staff is still recommending the SRO use as a permitted use for the following reasons:

- The main purpose of this text amendment is to support and implement the recently-adopted [Growing SLC five-year housing plan](#). Goal 1 of the plan is to **“Reform City practices to promote a responsive, high-opportunity housing market.”** Outlined objectives

that support this goal include, ***“Review and modify land use and zoning regulations to reflect the affordability needs of a growing, pioneering city,”*** and ***“Remove impediments in City processes to encourage housing development.”*** Designating the SRO use a conditional use would be counter-intuitive to these goals and objectives, as it would add significant review time and cost to the development process. Planning Staff finds that the qualifying provisions recommended in the current proposal would adequately address all concerns expressed by Commissioners thus far, and can be accomplished without making the use a conditional use.

- Staff maintains confidence in the list of zoning districts put forward to permit the SRO use. Location criteria used to choose these districts considered zones with existing design standards in place, and zones that already permit uses with similar characteristics and levels of intensity. In addition, all proposed districts already permit a mix of uses, and do not have density limitations. Staff finds that these characteristics, paired with the proposed qualifying provisions for the SRO use, will achieve the same result as the conditional use process, but require less of the applicants’ money and time.

RECOMMENDATION:

Based on the analysis and findings contained the staff report dated June 27, 2018, the memo dated July 11, 2018, and the additional findings contained in this memo, it is the opinion of Staff that the zoning text amendments as most recently proposed meet the intent of the Mayor’s direction and the standards for a zoning ordinance amendment. Staff recommends that the Planning Commission forwards a favorable recommendation of petition PLNPCM2018-00066 to the City Council for their consideration.

ATTACHMENTS:

- A. [Proposed Text Amendments \(revised since 6/27 and 7/11/2018 meetings\)](#)
- B. [Maps of Proposed Districts’ Proximity to Single and Two-Family Zoning Districts](#)
- C. [Map of Proposed Districts’ Proximity to Frequent Public Transit Corridors](#)

ATTACHMENT A: PROPOSED TEXT AMENDMENTS

21A.62.040: DEFINITIONS OF TERMS:

DWELLING: A building or portion thereof, which is designated for residential purposes of a family for occupancy on a monthly basis and which is a self-contained unit with kitchen and bathroom facilities. The term "dwelling" excludes living space within hotels, bed and breakfast establishments, ~~apartment hotels~~ single room occupancy (SRO) establishments, boarding houses and lodging houses.

~~DWELLING, SINGLE ROOM OCCUPANCY (SRO): A residential dwelling facility containing individual, self-contained, dwelling units none of which may exceed five hundred (500) square feet in size.~~

A building, or portion thereof, that is designated for residential purposes and contains individual units to house 1-2 tenants each on a weekly or monthly basis. Each individual unit consists of one combined living and sleeping room and may contain either a private kitchen or separate private bathroom, but not both. Whichever amenities are not contained within the individual unit (the kitchen, bathroom, or both) shall be provided as a common facility within the same building, to be shared with the tenants of other SRO units. An SRO may include an office for the purpose of managing the SRO units and common facilities, and/or one self-contained unit with private kitchen and bathroom facilities for a caretaker or manager. The SRO use shall be subject to the same lot and bulk requirements as the Multi-Family Dwelling use.

21A.33.020: TABLE OF PERMITTED AND CONDITIONAL USES FOR RESIDENTIAL DISTRICTS:

Legend:	C =	Conditional	P =	Permitted
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Use	Permitted And Conditional Uses By District																		
	FR -1/ 43, 56 0	FR -2/ 21, 78 0	FR -3/ 12, 00 0	R- 1/ 12, 00 0	R- 1/ 7, 00 0	R- 1/ 5, 00 0	S R - 1	S R - 2	S R - 3	R - 2	R M F- 3 0	R M F- 3 5	R M F- 4 5	R M F- 7 5	R B	R - M U - 3 5	R - M U - 4 5	R - M U	R O
Single room occupancy (SRO)																P	P	P	

21A.33.030: TABLE OF PERMITTED AND CONDITIONAL USES FOR COMMERCIAL DISTRICTS:

Legend:	C =	Conditional	P =	Permitted
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Use	Permitted And Conditional Uses By District						
	CN	CB	CS ¹	CC	CSHBD ¹	CG	SNB
Dwelling:							
Single room occupancy							
<u>Single room occupancy (SRO)</u>				<u>P</u>	<u>P</u>	<u>P</u>	

21A.33.035: TABLE OF PERMITTED AND CONDITIONAL USES FOR TRANSIT STATION AREA DISTRICTS:

Legend:	C =	Conditional	P =	Permitted
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Use	Permitted And Conditional Uses By District							
	TSA-UC		TSA-UN		TSA-MUEC		TSA-SP	
	Core	Transitio n	Core	Transitio n	Core	Transitio n	Core	Transitio n
Dwelling:								
Single room occupancy	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>
<u>Single room occupancy (SRO)</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>

21A.33.050: TABLE OF PERMITTED AND CONDITIONAL USES FOR DOWNTOWN DISTRICTS:

Legend:	C =	Conditional	P =	Permitted
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Use	Permitted And Conditional Uses By District			
	D-1	D-2	D-3	D-4
<u>Single room occupancy (SRO)</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>

21A.33.060: TABLE OF PERMITTED AND CONDITIONAL USES IN THE GATEWAY DISTRICT:

Legend:	C =	Conditional	P =	Permitted
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Use	G-MU
<u>Single room occupancy (SRO)</u>	<u>P</u>

21A.33.070: TABLE OF PERMITTED AND CONDITIONAL USES FOR SPECIAL PURPOSE DISTRICTS:

Legend:	C =	Conditional	P =	Permitted
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Use	Permitted And Conditional Uses By District																
	R P	B P	F P	A G	A G- 2	A G- 5	A G- 20	O S	NO S	A	P L	P L- 2	I	UI	M H	EI	M U
<u>Single room occupa ncy (SRO)</u>																	<u>P</u>

21A.33.080: TABLE OF PERMITTED AND CONDITIONAL USES IN FORM BASED DISTRICTS:

Legend:	P = Permitted	C = Conditional
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Use	Permitted Uses By District			
	FB-UN1	FB-UN2	FB-SC	FB-SE
Dwelling:				
Single room occupancy		P		
<u>Single room occupancy (SRO)</u>		<u>P</u>	<u>P</u>	<u>P</u>

21A.36.360: QUALIFYING PROVISIONS FOR THE SINGLE ROOM OCCUPANCY (SRO) USE:

The single room occupancy (SRO) use, as defined in 21A.62 of this title, shall be allowed in zoning districts identified in 21A.33 "Land Use Tables," and are subject to the following provisions:

A. Minimum Floor Area of Units: Each individual unit shall contain a minimum of 150 square feet of floor area for a single tenant, or a minimum of 200 square feet of floor area for two (2) tenants.

1. The floor area of each individual unit shall be calculated as the sum of the gross horizontal area of the unit measured from the interior face of interior walls.

2. Calculation of this area shall not include the areas consumed by separate private bathroom amenities, closet/storage, or mechanical areas included within the individual unit.

B. Communal Areas: Communal areas including, but not limited to, libraries, lounges, recreation rooms, dining rooms, laundry rooms, and meeting rooms that are accessible to all residents of the SRO with sufficient accommodations for socializing and meeting shall be provided, and shall meet the following requirements:

1. The total amount of communal area shall have a floor area that is a minimum of 15 percent (15%) of the total floor area of all individual units.

a. The total floor area of all units shall be calculated by totaling the floor area of each individual unit (using the methodology outlined in 21A.36.360.A above) plus the areas consumed by any separate private bathroom amenities, closet/storage, or

mechanical areas included within the individual units.

b. Service areas including, but not limited to, hallways and corridors, storage areas (including bicycle storage), operations and maintenance areas, or management areas and offices may not be counted toward the communal area requirement.

C. Management:

1. A property manager shall be on site 24 hours a day, who will be responsible for the conduct, operation, and maintenance of the SRO;

2. All communal areas that are accessible to all tenants of the SRO shall be continuously monitored by security cameras.

21A.44.030: NUMBER OF OFF STREET PARKING SPACES REQUIRED:

TABLE 21A.44.030
SCHEDULE OF MINIMUM
OFF STREET PARKING REQUIREMENTS³

Residential:	
Multiple-family dwellings ¹	2 parking spaces for each dwelling unit containing 2 or more bedrooms 1 parking space for 1 bedroom and efficiency dwelling $\frac{1}{2}$ parking space for single room occupancy dwellings (600 square foot maximum)
<u>Single room occupancy (SRO)</u>	<u>$\frac{1}{2}$ parking space per individual unit</u>

21A.30.040: D-3 DOWNTOWN WAREHOUSE/RESIDENTIAL DISTRICT:

A. Purpose Statement: The purpose of the D-3 downtown warehouse/residential district is to provide for the reuse of existing warehouse buildings for multi-family and mixed use while also allowing for continued retail, office and warehouse use within the district. The reuse of existing buildings and the construction of new buildings are to be done as multi-family residential or mixed use developments containing retail or office uses on the lower floors and residential on the upper floors. This district is appropriate in areas where supported by applicable master plans. The standards are intended to create a unique and sustainable downtown neighborhood with a strong emphasis on urban design, adaptive reuse of existing buildings, alternative forms of transportation and pedestrian orientation.

B. Uses: Uses in the D-3 downtown warehouse/residential district as specified in section [21A.33.050](#), "Table Of Permitted And Conditional Uses For Downtown Districts", of this

title, are permitted subject to the provisions of this chapter and other applicable provisions of this title.

C. Controls Over Mixed Use: The concept of mixed use is central to the nature of the D-3 downtown warehouse/residential district. To ensure that mixed use developments provide for on site compatibility as well as neighborhood compatibility, the change of land use type or an increase in floor area by twenty five percent (25%) of existing principal buildings and the construction of buildings for new uses after April 12, 1995, shall conform to the following provisions.

Construction related to the rehabilitation including remodeling or modification of existing uses, or the change of use to a similar use, shall not be subject to these provisions:

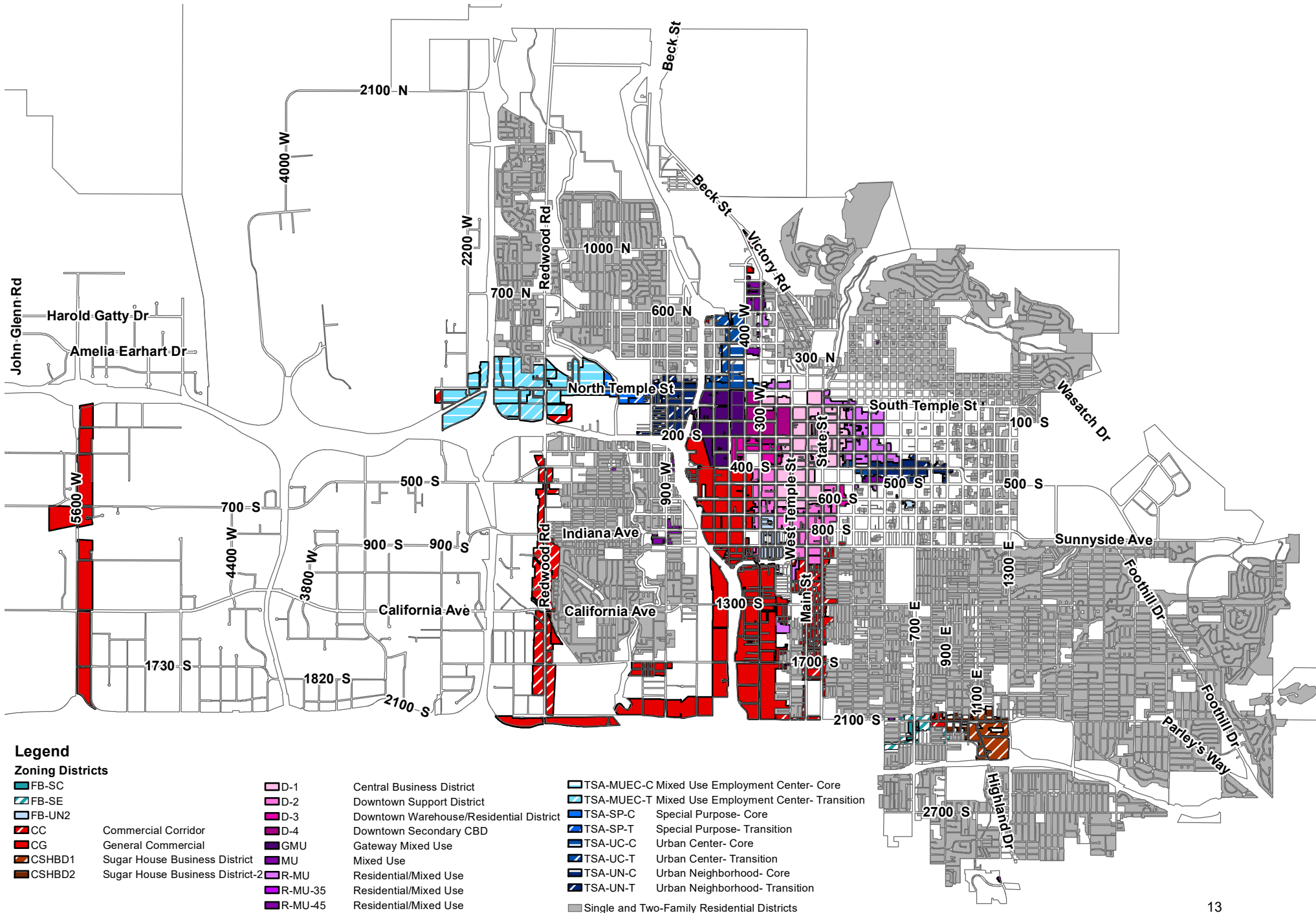
1. Buildings containing commercial/office uses located above the second story shall incorporate multi-family dwellings, single room occupancy (SRO), boarding house, bed and breakfast, or hotel uses in the amount of at least fifty percent (50%) of the total floor area of the building;

2. Commercial/office uses shall be permitted as the sole use in two-story buildings only; and

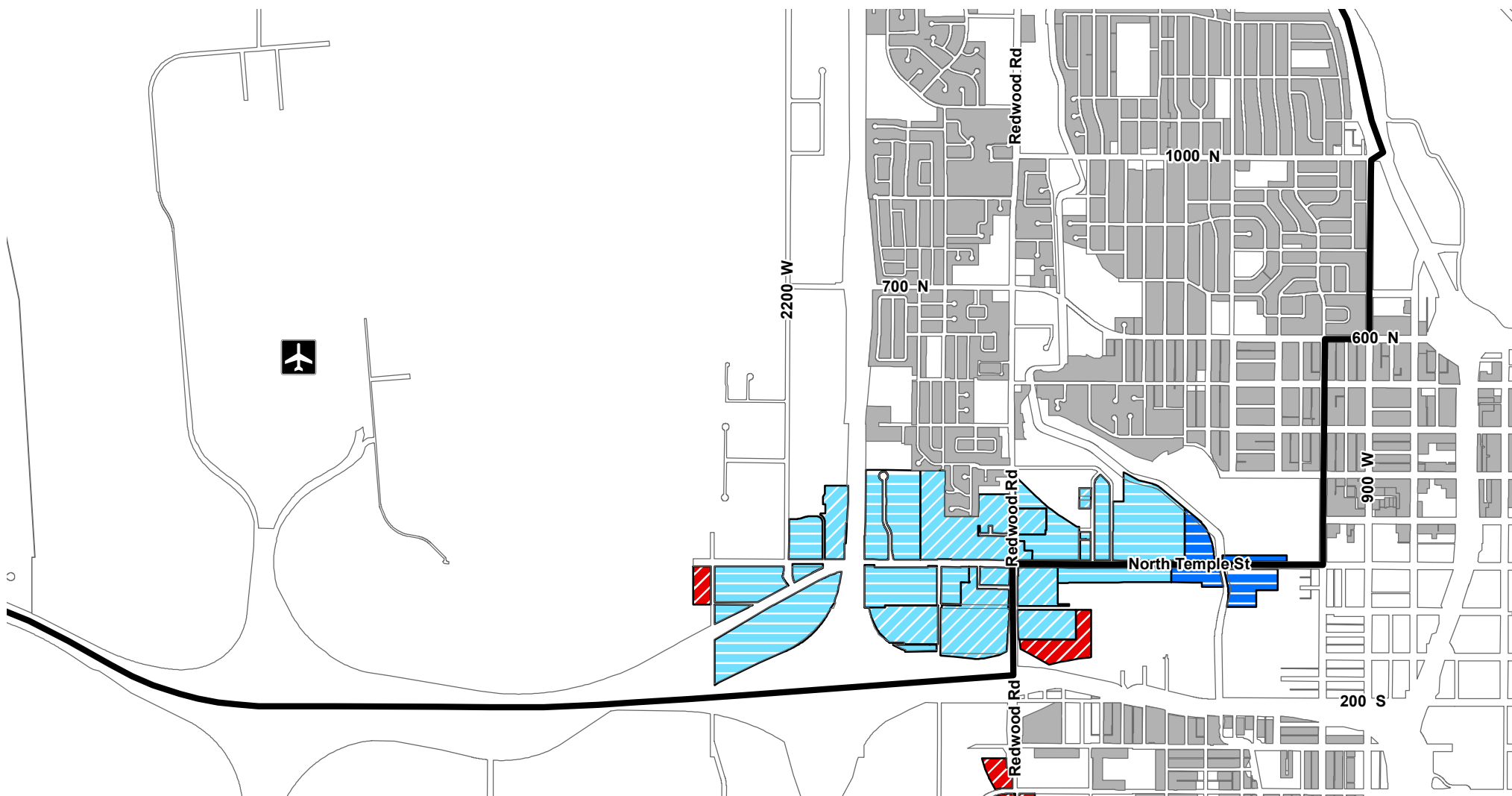
3. Commercial/office uses in buildings of three (3) stories or more without multi-family dwellings shall be allowed only as a conditional use and then only when the applicant has demonstrated that the proposed location is not suitable for multi-family residential use.

**ATTACHMENT B: MAPS OF SINGLE AND TWO-FAMILY
ZONING DISTRICTS**

Proposed Single-Room Occupancy Zoning Districts CITYWIDE



Proposed Single-Room Occupancy Zoning Districts CITY COUNCIL DISTRICT 1



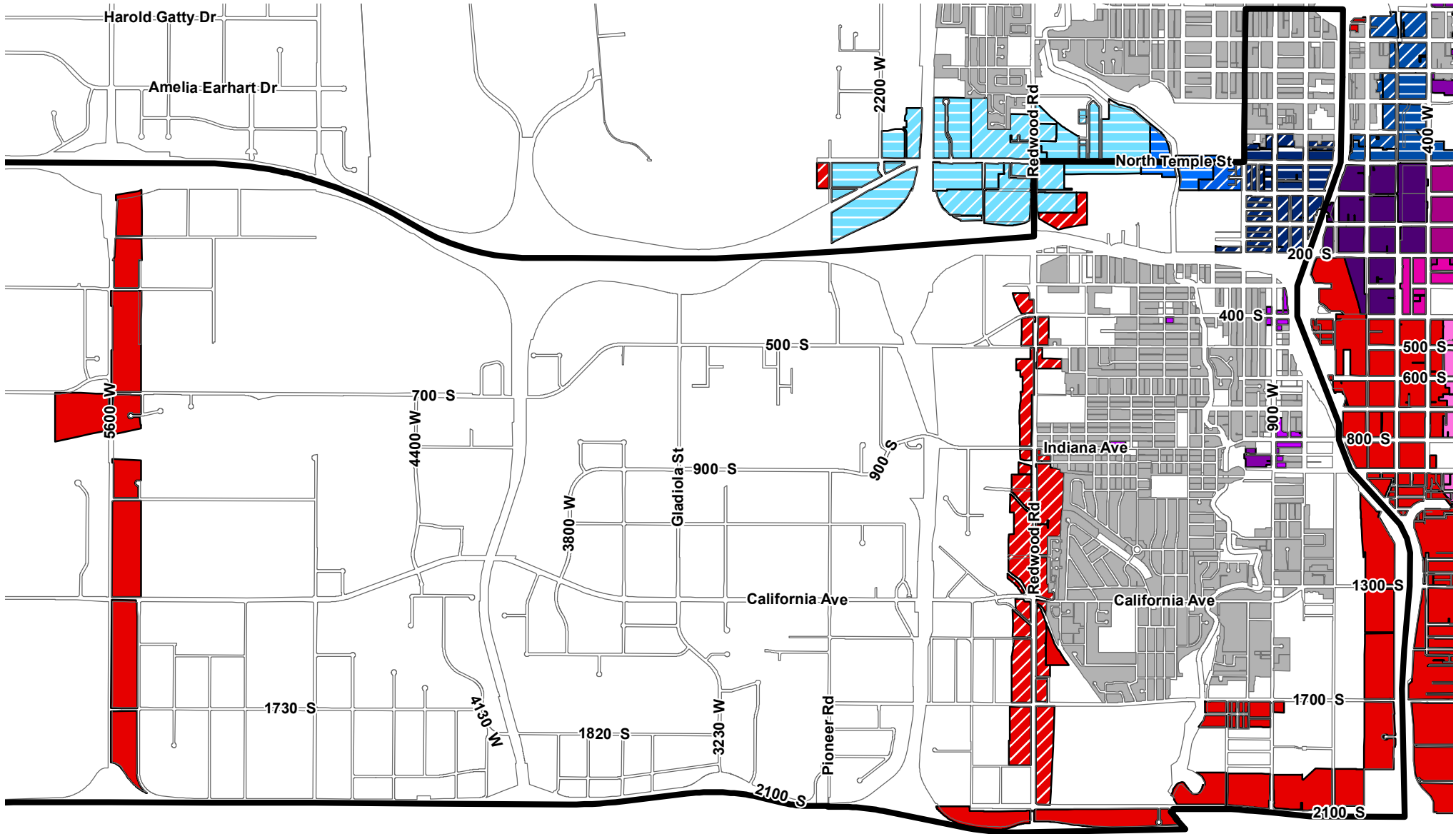
Legend

Zoning Districts

- CC Commercial Corridor
- TSA-MUEC-C Mixed Use Employment Center- Core
- TSA-MUEC-T Mixed Use Employment Center- Transition
- TSA-SP-C Special Purpose- Core
- Single and Two-Family Residential Districts

City Council District Boundary

Proposed Single-Room Occupancy Zoning Districts CITY COUNCIL DISTRICT 2



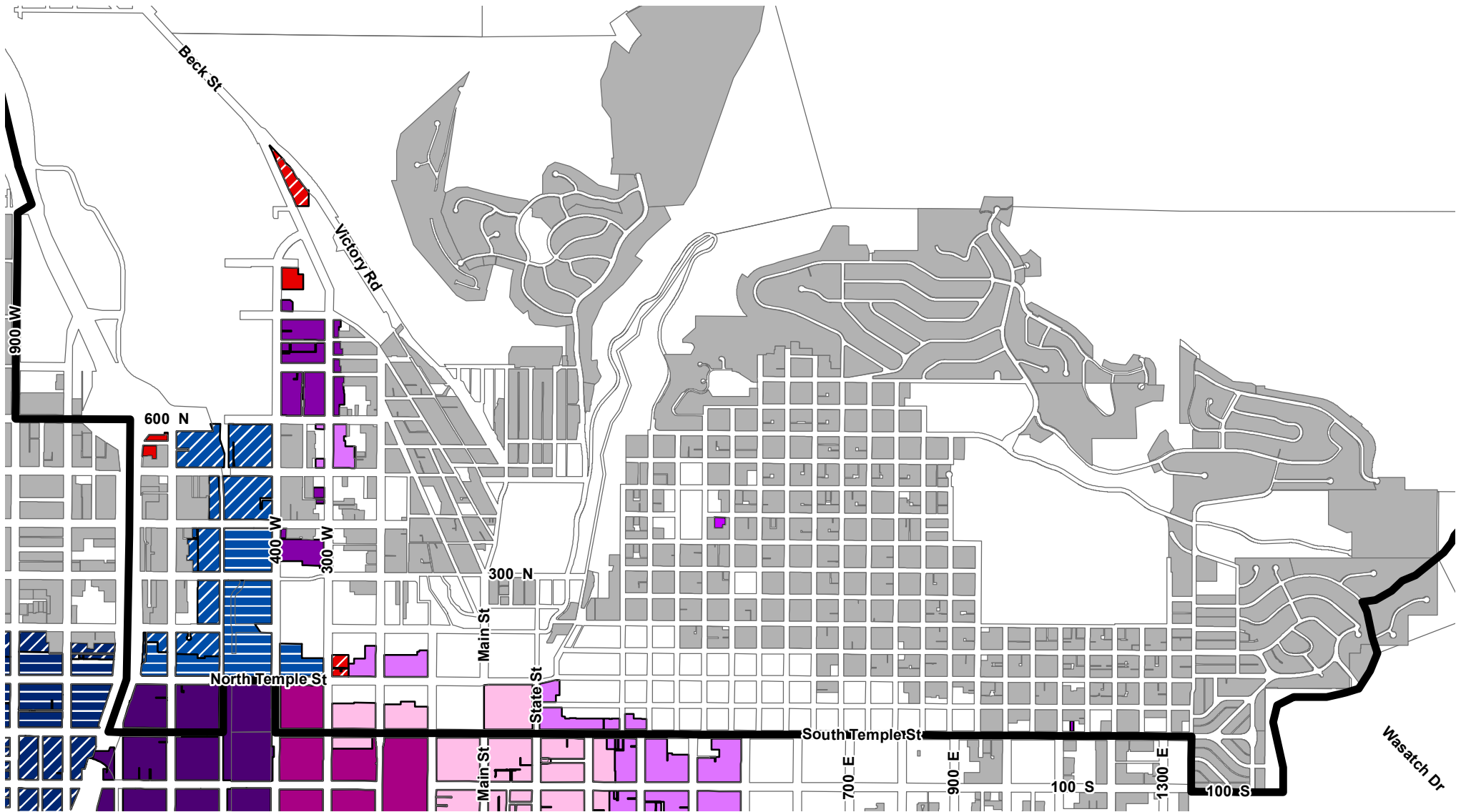
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Zoning Districts

- CC Commercial Corridor
- CG General Commercial
- R-MU-35 Residential/Mixed Use
- R-MU-45 Residential/Mixed Use
- Single and Two-Family Residential Districts

City Council District Boundary

Proposed Single-Room Occupancy Zoning Districts CITY COUNCIL DISTRICT 3

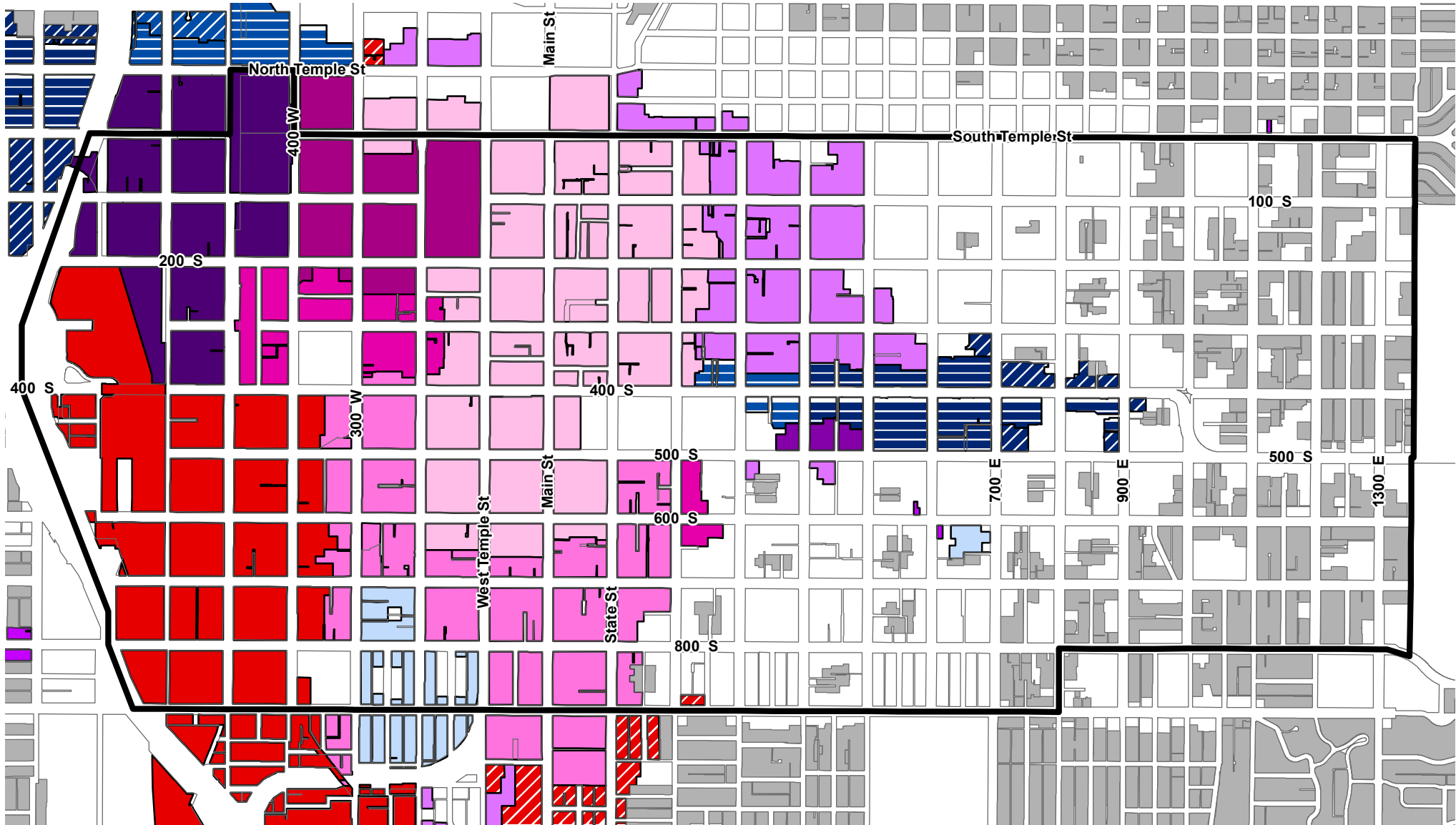


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Zoning Districts

	CC Commercial Corridor		GMU Gateway Mixed Use		TSA-UC-C Urban Center- Core
	CG General Commercial		MU Mixed Use		TSA-UC-T Urban Center- Transition
	D-1 Central Business District		R-MU Residential/Mixed Use		Single and Two-Family Residential Districts
	D-4 Downtown Secondary CBD		R-MU-35 Residential/Mixed Use		City Council District Boundary

Proposed Single-Room Occupancy Zoning Districts CITY COUNCIL DISTRICT 4



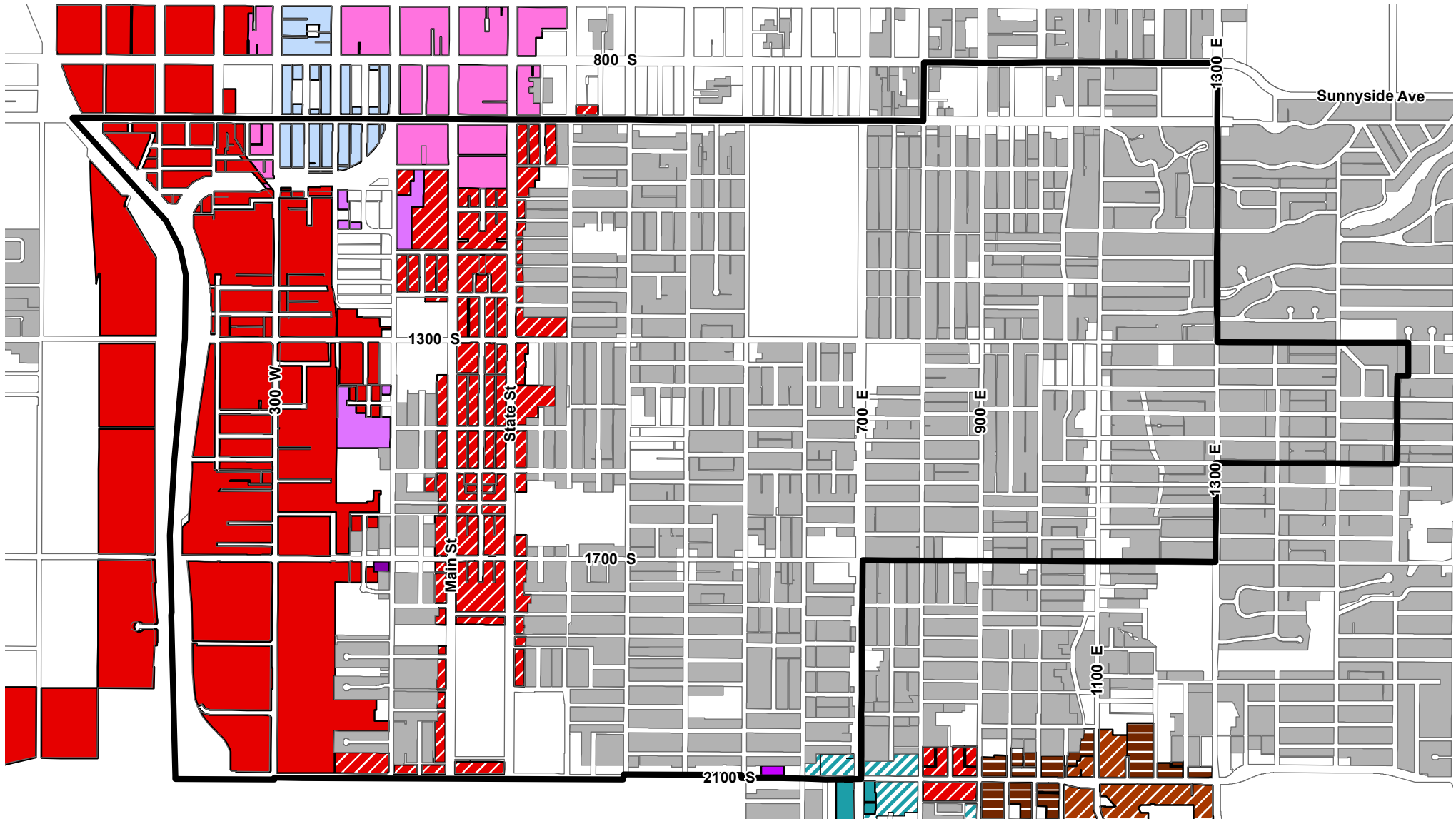
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Zoning Districts

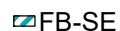

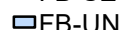

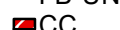

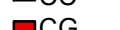

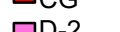
CC	Commercial Corridor	D-1	Central Business District
CG	General Commercial	D-2	Downtown Support District
GMU	Gateway Mixed Use	D-3	Downtown Warehouse/Residential District
R-MU	Residential/Mixed Use	D-4	Downtown Secondary CBD
R-MU-45	Residential/Mixed Use	FB-UN2	

TSA-UC-C	Urban Center- Core
TSA-UN-C	Urban Neighborhood- Core
TSA-UN-T	Urban Neighborhood- Transition
	Single and Two-Family Residential Districts
	City Council District Boundary

Proposed Single-Room Occupancy Zoning Districts CITY COUNCIL DISTRICT 5

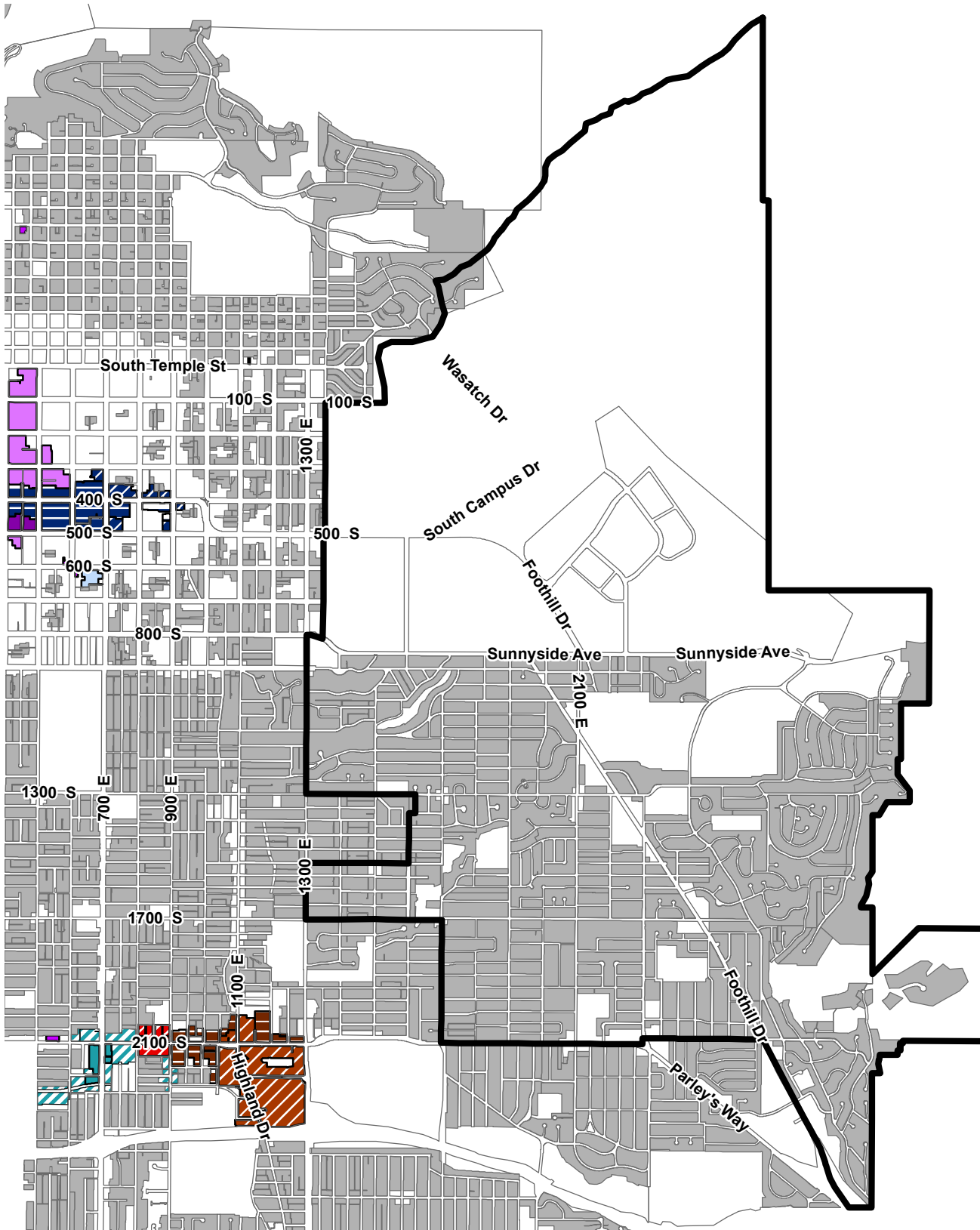


Legend Zoning Districts

- | | | | |
|---|-------------------------------|---|---|
|  | FB-SE |  | R-MU Residential/Mixed Use |
|  | FB-UN2 |  | R-MU-35 Residential/Mixed Use |
|  | CC Commercial Corridor |  | R-MU-45 Residential/Mixed Use |
|  | CG General Commercial |  | Single and Two-Family Residential Districts |
|  | D-2 Downtown Support District | | |

 City Council District Boundary

Proposed Single-Room Occupancy Zoning Districts CITY COUNCIL DISTRICT 6



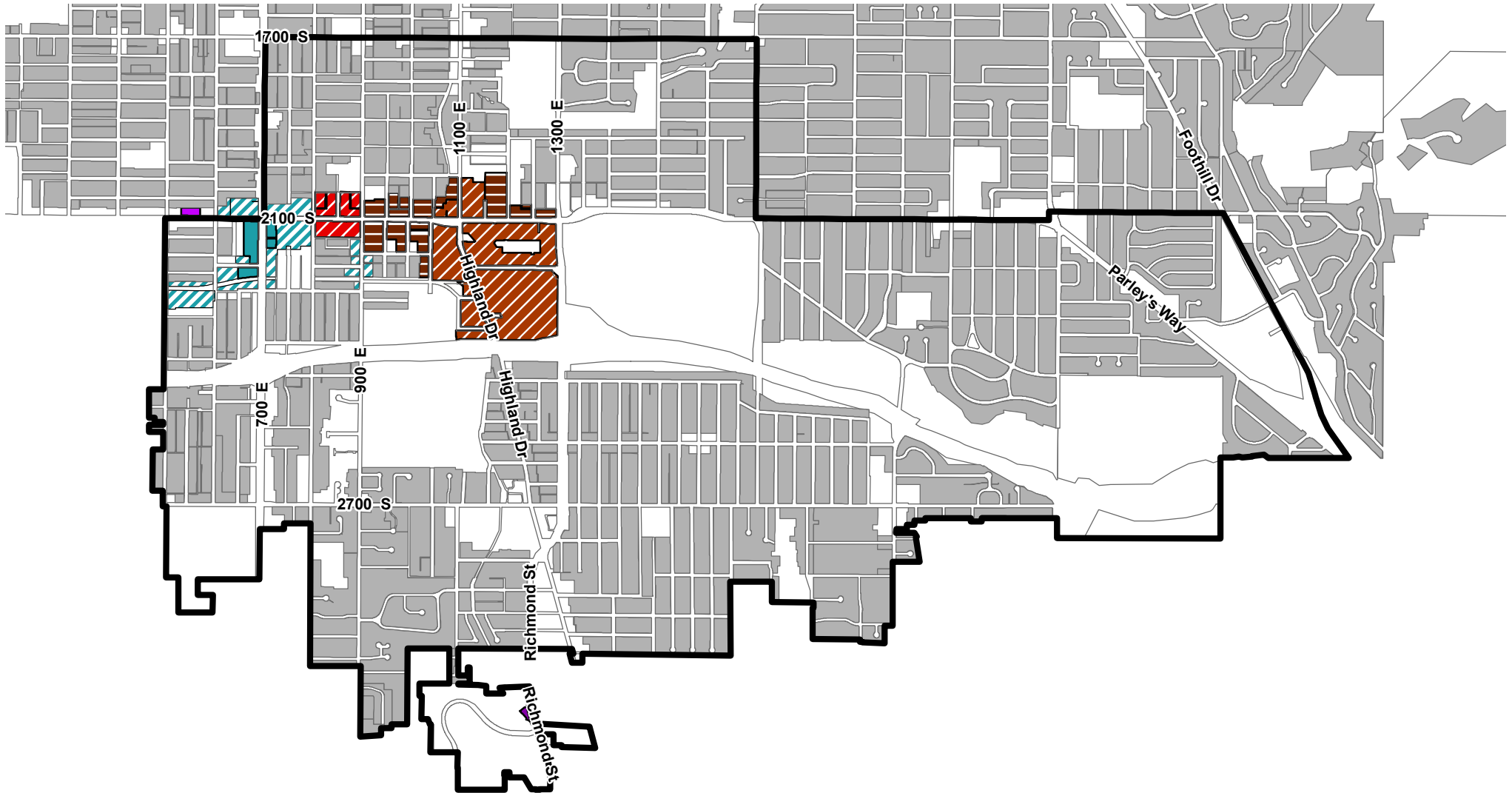
Legend

City Council District Boundary

Zoning Districts

Single and Two-Family Residential Districts

Proposed Single-Room Occupancy Zoning Districts CITY COUNCIL DISTRICT 7



Legend

Zoning Districts

FB-SC

FB-SE

CC Commercial Corridor

R-MU-35 Residential/Mixed Use

CSHBD1 Sugar House Business District

CSHBD2 Sugar House Business District-2

Single and Two-Family Residential Districts

City Council District Boundary

ATTACHMENT C: MAP OF PROXIMITY TO TRANSIT

CITYWIDE

