



# Staff Report

PLANNING DIVISION  
DEPARTMENT of COMMUNITY & NEIGHBORHOODS

To: Salt Lake City Planning Commission  
From: Tracy Tran, 801-535-7645 or [tracy.tran@slcgov.com](mailto:tracy.tran@slcgov.com)  
Date: January 24, 2018  
Re: PLNPCM2017-01038 – Global Trade Port in Manufacturing Zones Text Amendment

---

---

## Zoning Text Amendment

**PROPERTY ADDRESS:** City-wide  
**PARCEL ID:** N/A  
**MASTER PLAN:** N/A  
**ZONING DISTRICT:** M-1, M-2

**REQUEST:** The Mayor formally requested that the Salt Lake City Planning Division amend the zoning ordinance to allow for the development of a global trade port (referred to as a railroad freight terminal facility in our zoning ordinance).

**RECOMMENDATION:** Based on the analysis and findings of this report, it is the opinion of staff that the proposed zoning text amendments meet the intent of the Mayor's direction and standards for a zoning ordinance amendment. Staff recommends that the Planning Commission forward a favorable recommendation of petition PLNPCM2017-01038 to the City Council.

**ATTACHMENTS:**

- [A. Proposed Text Amendments](#)
- [B. Map of Manufacturing Zoning Districts in Salt Lake City](#)
- [C. Conditional Use Standards for reference](#)
- [D. Analysis of Standards](#)
- [E. Public Process and Comments](#)
- [F. Department Comments](#)

**PROJECT DESCRIPTION:**

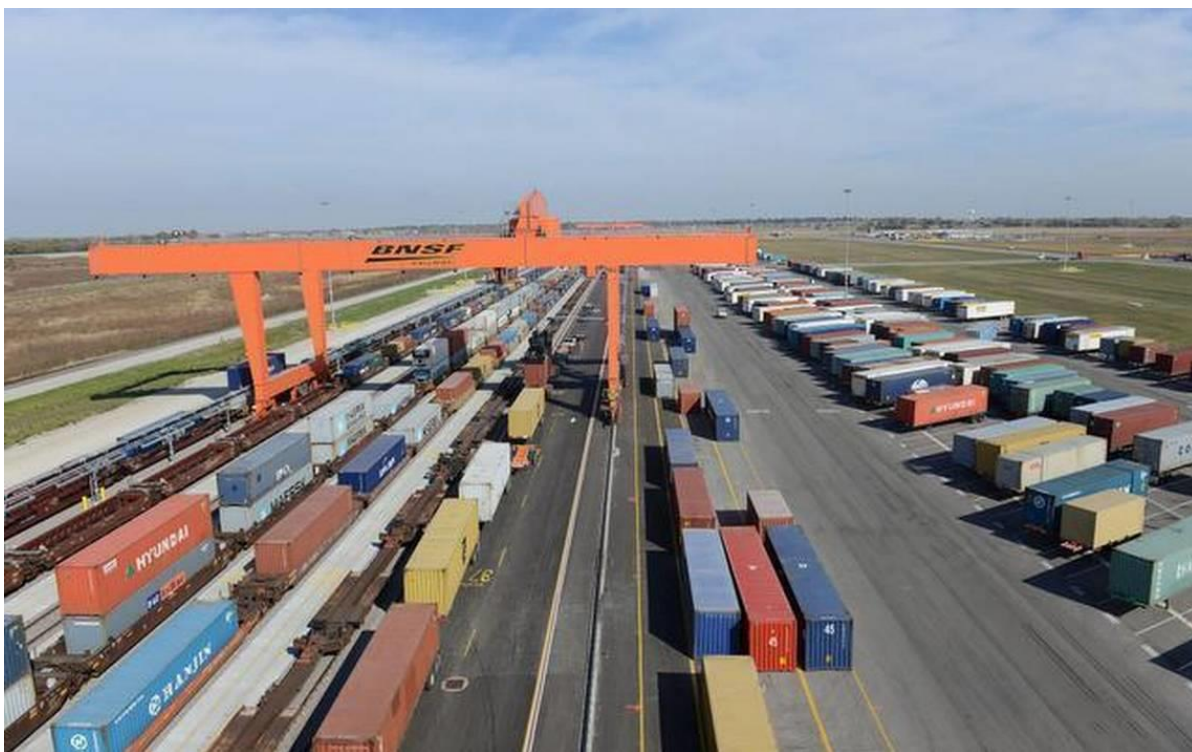
On December 8, 2017, the Mayor initiated a petition requesting that the Planning Division amend the zoning ordinance to allow for the development of a global trade port (also referred to as an inland port) in Salt Lake City's manufacturing zoning districts (M-1 Light Manufacturing and M-2 Heavy Manufacturing). The purpose of this petition would be to further the purpose of the district and to implement City goals to promote economic development in the area. There has been a lot of interest on the city, state, and county levels in having a global trade port, which can spur economic activity in the area by allowing for additional opportunities for international trade and distribution facilities.

The City recently adopted the Northwest Quadrant Master Plan, which includes the majority of the City's industrial development and the City has recently adopted many zoning amendments for this area that include re-zoning a large portion of land from AG (agricultural) to M-1 (light manufacturing). The plan and recent zoning amendments call for light industrial development in much of the Northwest Quadrant as it is located near the interstates, rail, and the airport. This would be the targeted area for uses such as warehousing, distribution, and light manufacturing, which furthers the economic development of the light industrial area. Although the proposed text amendments impact the manufacturing zoning districts city-wide, much of the interest in developing a global trade port has been centered in the Northwest Quadrant area of the City, both north and south of I-80.

### **Global Trade Port**

A global trade port is a transportation facility that moves goods in for distribution and warehousing and also moves goods out for transportation elsewhere. These ports can help move international freight inland more efficiently by providing a customs clearance terminal instead of solely relying on a coastal port. A global trade port has also been referred to as an inland port, logistics park, or intermodal facility. Benefits of these ports include, greater efficiency in both amount of goods that can be distributed, time saved as rail freight is not limited by the maximum number of hours a truck driver can drive, and reduction in transportation costs. The importance of freight terminals has grown with the expansion of globalization and e-commerce.

A global trade port will usually consist of rail line that transfers freight to another mode of transportation, such as trucks for distribution to warehouses. Large cranes are used to move freight from the different transportation modes and to temporarily store them as they wait to be transported elsewhere. A trade port typically may include warehousing as part of its development. As an example, the [Logistics Park Kansas City](#) shows how an inland port can operate.



Inland port in Kansas City

[http://www.kansascity.com/news/business/qgoxc8/picture11244200/alternates/LANDSCAPE\\_1140/kansas.jpg](http://www.kansascity.com/news/business/qgoxc8/picture11244200/alternates/LANDSCAPE_1140/kansas.jpg)

The State of Utah has had a long history of considering an inland port in Utah. However, it was in 2014 when government entities prioritized the study of an inland port. In August 2016, the Kem C. Gardner Policy Institute published [Salt Lake Inland Port Market Assessment](#) which explored an initial assessment of the feasibility and market for the potential development of an inland port in Salt Lake County. The study looked at essential characteristics of an inland port and key findings that included:

- Significant nationwide interest in inland port development
- Salt Lake City is favorably positioned
- Salt Lake City's Northwest Quadrant has emerged as a regional supply chain hub
- Creation of an inland port has a potential to become a jobs center
- Development of an inland port would require significant transportation investments and collaboration
- Concerns regarding environmental impacts – requires in-depth research and analysis

Salt Lake City's advantageous location near rail, interstates, and the airport make it a desirable location for an inland port. In August 2017, the State commissioned an additional feasibility study of an inland port. The final report titled [Utah Inland Port – Feasibility Analysis](#) was completed by GLD Partners in December 2017. The report provides a breakdown of the feasibility of an inland port and includes:

- Inland port typology
- Logistics environment in the region
- Competitiveness
- Market demand
- Environment
- Site requirements; and
- Recommended next steps

Overall, the report states that the market and overall opportunities in Utah could make for a successful global trade port in Salt Lake City, but it will require thoughtful planning and management.

### **Proposed Text Amendments**

With the momentum and signs pointing to Salt Lake City as an ideal location for a global trade port, the zoning ordinance requires changes in order to accommodate the needs and functions of this type of facility. The proposed amendments address the following issues within the current zoning ordinance:

- Definition of "Railroad Freight Terminal"
- The distance a Railroad Freight Terminal can be from another Railroad Freight Terminal
- The distance a Railroad Freight Terminal can be from residential uses
- Crane and lift heights
- Land uses that may relate to the function of a railroad freight terminal

### *Definition*

The current definition of a Railroad Freight Terminal Facility may pose an issue for how a global trade port operates today. Below is the current definition that includes the proposed changes in underlines and strikethroughs:

~~RAILROAD, FREIGHT TERMINAL FACILITY: A major railroad track yard area for primary use by railroad employees for regional scale interstate mainline oriented intermodal freight transfers of: a) multimodal (sea, rail, truck transport) self-contained cargo containers from train to train, train to semitruck trailer, and semitruck trailer to train loading; and b) for new motor vehicle train transports to semitruck trailer transports for regional distribution purposes. Also includes storage of train vehicles and temporary storage of bulk materials at the facility while the material awaits distribution. No breakdown of self-contained cargo containers occurs at intermodal railroad freight terminal facilities.~~

The proposed changes reflect current global trade port practices. The proposal removes the language that mentions “for primary use by railroad employees” as a global trade port can primarily be used by operators beyond railroad employees. The second strikethrough involves the breakdown of self-contained cargo containers, which is necessary as part of the customs clearance for a global trade port. Lastly, a global trade port may include temporary storage of bulk materials as it awaits distribution so this proposed change is also added to clarify what’s allowed as part of the operation of a railroad freight terminal facility.

### *Conditional Use*

The current ordinance allows a railroad freight terminal facility as a conditional use in both the M-1 (light manufacturing) and M-2 (heavy manufacturing) zoning districts. The railroad freight terminal facility will remain as a conditional use. Any development application for a railroad freight terminal facility submitted will be reviewed to ensure any detrimental impacts could be mitigated or eliminated.

Once a development plan is received, City staff would analyze the details of the proposal against the conditional use standards in chapter 21A.54 of the zoning ordinance. The Conditional Use process allows the City to evaluate the proposed development and ensure that the proposal does not cause any detrimental impacts. A proposed project could be approved, denied, or approved with conditions applied that ensure impacts are mitigated. One of the standards includes impacts to air quality. The standards for Chapter 21A.54: Conditional Uses are located in [Attachment C](#) to understand what a development project would need to meet.

### *Proximity Provisions*

In addition, the zoning ordinance includes two provisions related to a Railroad Freight Terminal in both the M-1 and M-2 zoning districts. The provisions:

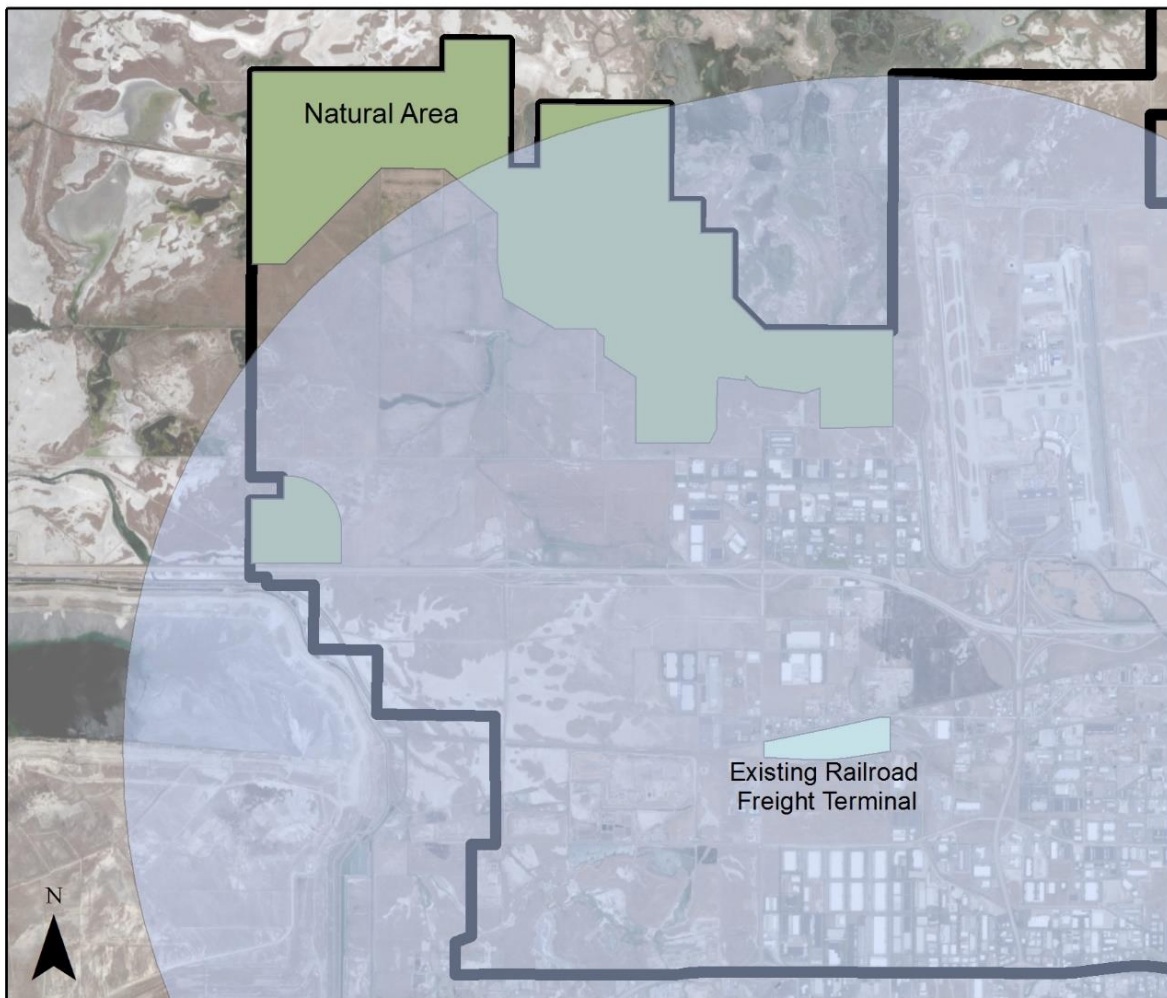
- Restrict a railroad freight terminal within 1,000 feet of single or-two family residential zoning districts
- Restrict a railroad freight terminal from being built within 5 miles of another railroad freight terminal

There is currently an existing railroad freight terminal located south of I-80 at approximately 900 South and 5600 West. Under the current zoning ordinance, an additional railroad freight terminal would not be allowed within five (5) miles of the existing railroad freight terminal, which would greatly limit the addition of a global trade port within Salt Lake City. A map showing the five (5) mile radius can be found below. The purpose of the 5 mile radius was to protect residential areas from additional railroad freight terminal facilities. Since the radius was adopted, research of other similar facilities is showing that a best practice is to prohibit these facilities from being located within one mile of residential areas. A 5 mile buffer is not necessary to achieve the goal of limiting the impact these

facilities have on residential areas. The [minutes](#) from the City Council meeting where this provision was adopted mentioned that the Council may want to at some point consolidate the railroad freight terminals so the provision will likely force the issue back to Council at a future date.

The proposed text amendments would remove the five (5) mile restriction to an existing railroad freight terminal. In addition, to address potential impacts to residential land uses, the regulation that prohibits railroad freight terminals within 1,000 feet of a single or two-family zoning district is proposed to be changed to restrict these uses within one mile of any residential zoning district. This one mile provision is in line with policy suggestions from a report stating new rail yards should not be located within one mile of homes and schools.

### 5 Mile Radius from Existing Railroad Freight Terminal Facility



### *Crane and Lift Heights*

Cranes and lifts that stack and move storage containers from one train to another train or truck for distribution are an essential part of the operation of a global trade port. Typical heights for cranes and lifts for global trade ports are approximately eight-five feet (85'). The current zoning ordinance does not specify the heights of structures such as cranes and lifts. The maximum building height in most

areas located in the M-1 district is 65 feet; however, there is a provision that allows buildings up to 85 feet in the area west of the airport and north of I-80 through the Conditional Building and Site Design Review process. There is also a provision that allows distillation columns up to a maximum height of 120 feet. In the M-2 zone the maximum building height is 80 feet with the exception of chimneys and smokestacks, which are allowed up to 120 feet in height. To ensure a global trade port would be able to operate with the necessary equipment, a standard has been added to allow for cranes, lifts, and similar offloading structures related to the operation of a railroad freight terminal facility up to eighty-five feet (85'). Staff is of the opinion that this is consistent with existing height exceptions in the M-1 and M2 zoning districts.

### *Associated Land Uses*

Currently the table of permitted and conditional uses for the manufacturing zoning districts does not allow grain elevators or a railroad repair shop within the M-1 zoning district. These uses may be necessary with a global trade port as a grain elevator could be developed nearby as shipments of grain come in through the railroad freight terminal. In addition, with the presence of railroad cars and locomotives, a railroad repair shop will be a necessary land use to service the railroad cars and locomotives. Currently, the M-1 and M-2 zoning districts allow for large truck repair use as a permitted use, which would include large diesel trucks that are in excess of one ton, which has similar impacts to a railroad repair shop. A grain elevator is a structure that is used to store grain which has minimal impacts. One potential impact could be that the movement of grain could produce dust. This use is proposed to be a permitted use within the M-1 zoning district with a provision that restricts it from being located within 1,000 feet of single or two family residential districts to ensure dust does not become an issue for residences.

## **KEY CONSIDERATIONS:**

### **Consideration 1: Economic Development**

The proposed changes support the City's economic development goals and implements the Northwest Quadrant Master Plan. The Northwest Quadrant Master Plan highlights this area as an economic engine for the City, region, and State with a focus on warehousing and light industrial development. With a global trade port facility, materials will be delivered to a central location, making it more desirable for warehousing and other businesses to locate near the facility.

### **Consideration 2: Air Quality Impacts and Advances in Technology**

One of the biggest concerns with railroad freight terminal facilities are the impact to local air quality. One of the arguments of the benefits of a global trade port is that rail transport can more efficiently move more products than trucks, which can take a large number of trucks off the road regionally and throughout the nation, resulting in less overall pollution. However, a large number of trucks still end up at the terminal to distribute the freight from the trains to other locations, and overall, a global trade port may create more concentrated pollution as a large number of trains and trucks concentrate at these intermodal terminals. The diesel particulate emissions from the number of trains, trucks, as well as the cranes and lifts, could add to the localized air quality issues.

A few studies have shown that there are high amounts of emissions, particularly diesel particulate emissions at these rail yards. In a report [Tracking Harm: Health and](#)

[Environmental Impacts of Rail Yards](#), compiled by The Impact Project in 2012 that studied rail yards in California, policy recommendations included:

- Use land use rules and alternative transportation strategies to limit health impacts – The California Air Resources Board included a guideline that include “Avoid new sensitive land uses within 1,000 feet of a service or maintenance yard” and it also mentioned that a new rail yard should not be located within a mile of homes and schools
- Use city and county level measures such as limiting truck operating capacity limit, restricting hours of operation

In contrast, there have also been studies that have shown significant decreases in emissions at ports. In the [Utah Inland Port – Feasibility Analysis](#), the report provided two cases studies on existing ports regarding some of their environmental efforts. The analysis looked at the Port of Los Angeles and the World London Gateway. The best practices highlighted the following:

- The Port of Los Angeles created an Air Quality Report Card to see the progress of their clean air program. The report card showed the progress in reducing harmful emissions from port-related sources, which displayed the following gross reductions:
  - Diesel Particulate Matter (DPM) 85%
  - Fine Particles (PM2.5) 83%
  - Course Particles (PM10) 84%
  - Nitrogen Oxide (NOx) 51%
  - Sulphur Oxide (SOx) 97%
- The Port of Los Angeles implemented a zero-emission vehicle program and converted their entire fleet of vehicles to clean trucks. All port vehicles are powered by electric propulsion equipment and they have a stringent truck idling program
- The World London Gateway has a sustainability strategy that includes:
  - Creating an advisory committee on sustainability
  - Defining next-generation building guidelines
  - Launching a Go Green Campaign

In regards to local emissions in Salt Lake County, The Utah Department of Environmental Quality has 2014 statewide emission inventories that include [Non-Road Mobile Summary](#) for [aircrafts](#), [locomotives](#), and [miscellaneous non-road engines](#). This data shows that locomotives account for a relatively small percentage of the pollutants of the overall Non-Road Mobile sources:

Salt Lake County Tons per year	Locomotives	Total Non-Road Mobile Sources (Locomotives, Aircraft, Misc)	Locomotives % of Total Non- Road Sources
CO	128.37	121,315.93	0.1%
NOx	764.5	17,287.85	4.4%
Exhaust PM 10	18.87	1,528.08	1.2%
Exhaust PM 2.5	18.31	1,449.41	1.3%
SO2	5.74	214.30	2.7%
VOC	38.78	20,066.45	0.2%

Air quality is a big concern for Salt Lake City and the Salt Lake Valley, particularly in the summer and winter months when the inversion occurs and traps pollution in our air shed. To address the air quality concerns with the concentration of particulate emissions, a provision was added to the land use tables that requires a railroad freight terminal to be at least one mile away from any residential zoning district. This one mile restriction reflects the policy recommendation from the study above. Many of the studies and research on railyards highlight the proximity to living near these railyards as a great concern. In addition, railroad freight terminal facilities remain as a conditional use in the land use tables in both the M-1 and M-2 zoning districts to ensure that any detrimental impacts could be analyzed and mitigated.

As noted above and in many studies, air quality impacts from the large number of vehicles at these facilities is a significant concern. However, technology has continued to advance in developing more efficient, cleaner-burning rail engines. EPA mandates were implemented in 2008 that required cleaner fuel in 2012 and cleaner-burning engines in 2015.<sup>1</sup> Maintaining railroad freight terminal facilities as a conditional use allows for these facilities to be evaluated on a development by development basis to ensure the best technology is being considered.

The [Utah Inland Port – Feasibility Analysis](#) lists strategy considerations that should shape a project’s focus on sustainability. These considerations include the rapidly changing industry practices and advances in truck transportation technology. Rapid changes in transportation technology means that in the next few years a variety of new technologies will be available that will allow for truck autonomy (driverless vehicles), truck platooning, and incorporation of alternative propulsion systems (such as electric vehicles) that should greatly reduce negative air quality impacts.

### **Consideration 3: Public Comments – Concerns**

A few public comments have been received concerning the proposed text amendments. The public comments also included some questions from Westpointe Community Council. Staff responded to some of those questions within the comments submitted in [Attachment E](#). All the comments can be found in [Attachment E](#). The comments include:

#### *Impacts to environment and sensitive areas:*

- Negative impacts on ecological and economic interests of the Great Salt Lake, wetlands, biological resources
- Use is too large-scale and intensive, which impact sensitive lands
- Concerns regarding environmental impacts and the impact on the Great Salt Lake, wetlands, water resources, and migratory birds.
- Introducing invasive species
- Concerns regarding the temporary storage of material such as chemicals or petroleum and the potential for spills
- “Temporary” storage is not defined - leaving questions unanswered and potential abuse

---

<sup>1</sup> Eiguren-Fernandez, Arantzazu. “Exposure to Rail Yard Emissions and Possible Health Impacts on Adjacent Communities.” Center for Occupational and Environmental Health. <http://www.scientificintegrityinstitute.org/coehrail100410.pdf>



*Inconsistency with city policies and rules:*

- A global trade port use is inconsistent with purpose of the M-1 zoning district and the facilities that are being contemplated are not what has been envisioned as light industrial uses in the developable area of the Northwest Quadrant Overlay north of I-80.
- Not consistent with the Northwest Quadrant Master Plan
- Global trade port is more suited in the heavy industrial zone

*Restrict railroad freight terminal facilities, railroad repair shop, and grain elevators:*

- Exclude Railroad freight terminal facility and railroad repair shop north of I-80(NWQ overlay)
  - Restrict from buffer at the least
  - Restrict from development area until environmental impacts can be further studied and minimizing impacts are better understood
  - Railroad repair shop – should be a conditional use and restricted north of I-80 within overlay

These comments are addressed as follows:

*Impacts to Sensitive Areas*

Many of these comments reflect why the City is maintaining the railroad freight terminal facility as a conditional use. There are concerns regarding the potential environmental impact of these uses; however, recent studies show that with improvements in technology, these uses are not as impactful as they were in the past. In addition, there are unknowns that cannot be addressed until a detailed development is planned and submitted.

As mentioned above in the *Conditional Use* section of the Proposed Text Amendments heading, once a development plan is received, City staff would analyze the details of the proposal against the conditional use standards in chapter 21A.54 of the zoning ordinance, which include impacts to air quality and impacts to adjacent properties. The Conditional Use process allows the City to analyze any proposed development and ensure that a proposal does not create any detrimental impact to Salt Lake City. A proposed project could be approved, denied, or approved with conditions applied that ensure impacts are mitigated. The standards for Chapter 21A.54: Conditional Uses have been attached to [Attachment C](#) to help understand the standards a development project would need to meet.

The City recognizes the great interest in an inland port and that Salt Lake City has been identified as the ideal location. Not allowing an avenue for a global trade port through City zoning regulations could have a greater impact on the City. Allowing these uses through the Conditional Use process could help to ensure that the City has regulatory authority and allows the City to require measures to mitigate future impacts. If, for whatever reason the City's land use authority is diminished, the City would not be able to control the approval process and may not be able to use the conditional use process to address potential detrimental impacts

*City Policies and Rules/Restricting Railroad Freight Terminal*

The Northwest Quadrant Master Plan envisions an area that balances economic development with protection of sensitive lands. Depending on the details of the design, a global trade port and the supporting warehousing and distribution that would come along with a global trade port could fit in within that vision. In the [Utah Inland Port – Feasibility Analysis](#), the report states that the port should be a sustainable port as part of its mission. However, there could also be models or plans for a global trade port that are not compatible with the vision of the Northwest Quadrant. Thus, it is important to allow railroad freight terminal facilities as a conditional use. In addition, within the newly created Northwest Quadrant Zoning Overlay, the area north of I-80 contains additional provisions within the Eco-Industrial Buffer Area and the Development Area to address items such as lighting, glass treatments, landscaping requirements, and required fencing to mitigate impacts on the migratory bird population and sensitive areas.

As part of the Northwest Quadrant Master Plan and zoning amendment process, the property owners north of I-80 and the environmental groups agreed to a development line that delineates where development should occur and where it should not. According to the property owners and the environmental groups, the development boundary line was established in a location that had a built in buffer within the conservation zone. This means that the sensitive lands are located further from the development boundary to ensure adequate buffer to protect the sensitive areas, wildlife, and habitat.

#### *Railroad Repair Shop and Grain Elevators*

With the presence of rail within the Northwest Quadrant and the potential for a global trade port, railroad repair will be a necessary function for rail uses within the manufacturing zoning districts. Staff finds a railroad repair shop (a covered facility where railcars/locomotives are repaired) as having similar impacts to a large truck repair use, which is currently a permitted use in both the manufacturing zones. In addition, staff finds that a grain elevator may also be a practical use related to a railroad freight terminal and a structure that stores grains has minimal impacts on surrounding uses. In cases where dust may be of concern, the proposal prohibits these uses within 1,000 feet of single and two family residential districts.

#### **Consideration 4: Public Comments – Supportive of Proposal**

As of the date the staff report was published, we have received one letter in support of the proposal. The full comments can be found in [Attachment E](#). The comments include:

- Opportunity for Salt Lake to be a leader in the global logistics supply chain
- Current rail infrastructure not adequate to handle logistics growth and growth will burden existing roads and infrastructure
- Rail is a sustainable solution where one modern unit train can take as many as 280 trucks off the same route and less fuel is used in the transportation of goods
- Modern rail is efficient and sustainable, will ensure best practices to respect storm water treatment, and features dark skylighting to reduce impact on natural habitats

- Dedicated to working with Salt Lake City and will not adversely impact the sensitive nature of the Northwest Quadrant

**DISCUSSION:**

The Mayor has recommended that staff review and update the city's zoning ordinance to accommodate the future development of a global trade port. The proposed changes would amend language within the zoning ordinance that would allow for the operation of an inland port and associated uses to occur.

The City Council recently approved a development agreement with the property owners to address long term land use and tax increment collection in the area. That agreement references the proposed zoning changes as a necessary part of the agreement. Throughout the planning process for the Northwest Quadrant, the City Council has supported the idea of a global trade port in the Northwest Quadrant and has considered a railroad freight terminal facility as a necessary component of the global trade port.

A global trade port would be considered a railroad freight terminal facility use that is considered a conditional use in both the M-1 Light Manufacturing and M-2 Heavy Manufacturing zoning districts. Issues such as air quality concerns, impacts to sensitive areas, lighting, etc. would be evaluated against the Conditional Use standards. The process required for a conditional use would ensure detrimental impacts related to a railroad freight terminal facilities are addressed

**NEXT STEPS:**

The Planning Commission's recommendation for these proposed zoning text amendments will be forwarded on to the City Council for their action. The City Council is the decision-making body for zoning text amendments.

# **ATTACHMENT A: PROPOSED TEXT AMENDMENTS**

## **21A.28.020: M-1 LIGHT MANUFACTURING DISTRICT:**

- A. Purpose Statement: The purpose of the M-1 light manufacturing district is to provide an environment for light industrial uses that produce no appreciable impact on adjacent properties, that desire a clean attractive industrial setting, and that protects nearby sensitive lands and waterways. This zone is appropriate in locations that are supported by the applicable master plan policies adopted by the city. This district is intended to provide areas in the city that generate employment opportunities and to promote economic development. The uses include other types of land uses that support and provide service to manufacturing and industrial uses. Safe, convenient and inviting connections that provide access to businesses from public sidewalks, bike paths and streets are necessary and to be provided in an equal way. Certain land uses are prohibited in order to preserve land for manufacturing uses and to promote the importance of nearby environmentally sensitive lands.
- B. Uses: Uses in the M-1 light manufacturing district as specified in Section 21A.33.040, “Table of Permitted and Conditional Uses for Manufacturing Districts”, of this title are permitted subject to the general provisions set forth in Section 21A.28.010 of this chapter.
- C. Minimum Lot Size:
1. Minimum Lot Area: Ten thousand (10,000) square feet.
  2. Minimum Lot Width: Eighty feet (80’).
  3. Existing Lots: Lots legally existing as of April 12, 1995, shall be considered legal conforming lots.
- D. Minimum Yard Requirements:
1. Front Yard: Fifteen feet (15’).
  2. Corner Side Yard: Fifteen feet (15’).
  3. Interior Side Yard: None required.
  4. Rear Yard: None required.
  5. Accessory Uses, Buildings and Structures in Yards: Accessory uses, buildings and structures may be located in a required yard area subject to Section 21A.36.020, Table 21A.36.020.B of this title.

6. Additional Setback when Adjacent to AG-2 and AG-5 districts: When adjacent to a lot in the AG-2 or AG-5 zoning district, buildings or portions of buildings, shall be setback one foot (1') beyond the required landscape buffer as required in Section 21A.48.080 for every one foot (1') of building height above 30 feet (30').

E. Landscape Yard Requirements:

1. Front and Corner Side Yards: All required front and corner side yards shall be maintained as landscape yards in conformance with the requirements of Chapter 21A.48 of this title.
2. Buffer Yards: All lots abutting a lot in a residential district shall conform to the buffer yard requirements of Chapter 21A.48 of this title.
3. Properties located within the Northwest Quadrant Overlay District are subject to Special Landscape requirements as outlined in Section 21A.34.140B.2.

F. Maximum Height:

1. No building shall exceed sixty five feet (65') except that emission free distillation column structures, necessary for manufacture processing purposes, shall be permitted up to the most restrictive federal aviation administration imposed minimal approach surface elevations, or one hundred twenty feet (120') maximum, whichever is less. Said approach surface elevation will be determined by the Salt Lake City Department of Airports at the proposed locations of the distillation column structure. Any proposed development in the airport flight path protection (AFPP) overlay district, as outlined in Section 21A.34.040 of this title, will require approval of the department of airports prior to issuance of a building permit. All proposed development within the AFPP overlay district which exceeds fifty feet (50') ~~will~~ may also require site specific approval from the federal aviation administration.
2. In the M-1 zoning districts located west of the Salt Lake City International Airport and north of Interstate 80 (I-80), buildings may exceed sixty five feet (65') in height subject to the conditional building and site design review standards and procedures of Chapter 21A.59 of this title. In no case shall any building exceed eighty five feet (85').
3. Railroad Offloading Structures: Cranes, lifts, and other similar offloading structures related to the operation of a railroad freight terminal are allowed up to eighty-five feet (85') in height and are also subject to the Airport Flight Path Protection (AFPP) overlay district and Federal Aviation Administration (FAA) requirements.

**21A.28.030: M-2 HEAVY MANUFACTURING DISTRICT:**

A. Purpose Statement: The purpose of the M-2 heavy manufacturing district is to provide an environment for larger and more intensive industrial uses that do not require, and may not be appropriate for, a nuisance free environment. This zone is appropriate in locations that are supported by the applicable master plan policies adopted by the city. This district is intended to provide areas in the city that generate employment opportunities and to promote economic development. The uses include other types of land uses that support and provide service to manufacturing and industrial uses. Due to the nature of uses allowed in this zone, land uses that may be adversely impacted by heavy manufacturing activities are not permitted. Certain land uses are prohibited in order to preserve land for manufacturing uses. Safe, convenient and inviting connections that provide access to businesses from public sidewalks, bike paths and streets are necessary and to be provided in an equal way.

B. Uses: Uses in the M-2 heavy manufacturing district as specified in section [21A.33.040](#), "Table Of Permitted And Conditional Uses For Manufacturing Districts", of this title are permitted subject to the general provisions set forth in section [21A.28.010](#) of this chapter.

C. Minimum Lot Size:

1. Minimum Lot Area: Twenty thousand (20,000) square feet.
2. Minimum Lot Width: Eighty feet (80').
3. Existing Lots: Lots established prior to April 12, 1995, shall be considered legal conforming lots.

D. Minimum Yard Requirements:

1. Front Yard: Twenty five feet (25').
2. Corner Side Yard: Fifteen feet (15').
3. Interior Side Yard: Twenty feet (20').
4. Rear Yard: Thirty five feet (35').
5. Accessory Uses, Buildings And Structures In Yards: Accessory uses, buildings and structures may be located in a required yard area subject to section [21A.36.020](#), table [21A.36.020B](#) of this title.

E. Landscape Yard Requirements: The first twenty five feet (25') of all required front yards and the first fifteen feet (15') of all required corner side yards shall be maintained as landscape yards in conformance with the requirements of [chapter 21A.48](#) of this title, including section [21A.48.110](#) of this title.

F. Maximum Height:

1. No building shall exceed eighty feet (80'), except that chimneys and smokestacks shall be permitted up to one hundred twenty feet (120') in height. (Ord. 66-13, 2013: Ord. 12-11, 2011: Ord. 35-99 §§ 30, 31, 1999: Ord. 26-95 § 2(14-6), 1995)

2. Railroad Offloading Structures: Cranes, lifts, and other similar offloading structures related to the operation of a railroad freight terminal are allowed up to eighty-five feet (85') in height and are also subject to the Airport Flight Path Protection (AFPP) overlay district and Federal Aviation Administration (FAA) requirements.

**21A.33.040: TABLE OF PERMITTED AND CONDITIONAL USES FOR MANUFACTURING DISTRICTS:**

Legend:	C =	Conditional	P =	Permitted
---------	-----	-------------	-----	-----------

Use	Permitted And Conditional Uses By District	
	M-1	M-2
Accessory use, except those that are otherwise specifically regulated elsewhere in this title	P	P
Adaptive reuse of a landmark site	C	C <sup>7</sup>
Agricultural use	P	P
Alcohol:		
Brewpub	P <sup>6,10</sup>	P <sup>6,10</sup>
Distillery	P	P
Social club	C <sup>6,10</sup>	C <sup>6,10</sup>

	Tavern	C <sup>6,10</sup>	C <sup>6,10</sup>
	Winery	P	P
Ambulance services (indoor and/or outdoor)		P	P
Animal:			
	Cremation service	P	P
	Kennel	P <sup>13</sup>	P
	Pet cemetery	P <sup>2</sup>	P <sup>2</sup>
	Pound	P <sup>12,13</sup>	P <sup>12</sup>
	Raising of furbearing animals	C	P
	Stockyard	C <sup>12</sup>	P <sup>12</sup>
	Veterinary office	P	P
Antenna, communication tower		P	P
Antenna, communication tower, exceeding the maximum building height		C	C
Artisan Food Production		P	P
Bakery, commercial		P	P
Blacksmith shop		P	P
Bottling plant		P	P
Brewery		P	P



Building materials distribution	P	P
Bus line station/terminal	P	P
Bus line yard and repair facility	P <sup>12</sup>	P
Check cashing/payday loan business	P <sup>9</sup>	
Chemical manufacturing and/or storage		C
Commercial food preparation	P	P
Community correctional facility, large	C <sup>8,16</sup>	
Community correctional facility, small	C <sup>8,16</sup>	
Community garden	P	
Concrete and/or asphalt manufacturing	C <sup>12,13</sup>	P <sup>12</sup>
Contractor's yard/office	P	P
Crematorium	P	P
Daycare center, adult	P	
Daycare center, child	P	
Drop forge industry		P
Dwelling, living quarters for caretaker or security guard, limited to uses on lots 1 acre in size or larger and is accessory to a principal use allowed by the zoning district	P	P
Equipment, heavy (rental, sales, service)	P	P
Equipment rental (indoor and/or outdoor)	P	P

Explosive manufacturing and storage		C <sup>12</sup>
Financial institution with or without drive-through facility	P <sup>11</sup>	
Flammable liquids or gases, heating fuel distribution and storage		P <sup>12</sup>
Food processing	P	P
Gas station	P	P
Government facility	P	P
Government facility requiring special design features for security purposes	P	P
Grain elevator	<u>P<sup>12</sup></u>	P
Greenhouse	P	
Heavy manufacturing		P <sup>12</sup>
Home occupation	P <sup>15</sup>	P <sup>15</sup>
Hotel/motel	P	
Impound lot	P <sup>12</sup>	P <sup>12</sup>
Incinerator, medical waste/hazardous waste		C <sup>12</sup>
Industrial assembly	P	P
Laboratory (medical, dental, optical)	P	
Laboratory, testing	P	P
Large wind energy system	P <sup>13,14</sup>	P

Laundry, commercial	P	P
Light manufacturing	P	P
Limousine service	P	P
Mobile food business (operation in the public right of way)	P	P
Mobile food business (operation on private property)	P	P
Mobile food court	P	P
Office	P	
Office, publishing company	P	
Open space	P	P
Package delivery facility	P	P
Paint manufacturing		P
Parking:		
Commercial	P	
Off site	P	P
Park and ride lot	P	P
Park and ride lot shared with existing use	P	P
Photo finishing lab	P	P
Poultry farm or processing plant		P <sup>12</sup>
Printing plant	P	

Radio, television station	P	
Railroad, freight terminal facility	C <sup>4,12</sup>	C <sup>4,12</sup>
Railroad, repair shop	<u>P</u>	P
Recreation (indoor)	P	
Recreation (outdoor)	P	
Recycling:		
Collection station	P	P
Processing center (indoor)	P	P
Processing center (outdoor)	C <sup>12,13,14</sup>	P <sup>12</sup>
Refinery, petroleum products		C <sup>12</sup>
Restaurant with or without drive-through facilities	P <sup>11</sup>	
Retail goods establishment with or without drive-through facility	P <sup>11</sup>	
Retail service establishment:		
Electronic repair shop	P	
Furniture repair shop	P	P
Upholstery shop	P	
Rock, sand and gravel storage and distribution	C	P
School:		

	Professional and vocational (with outdoor activities)	P	
	Professional and vocational (without outdoor activities)	P	
	Seminary and religious institute	P	
	Seasonal farm stand	P	P
	Sexually oriented business	P <sup>5</sup>	
	Sign painting/fabrication	P	P
	Slaughterhouse		P <sup>12</sup>
	Small brewery	P	P
	Solar array	P	P
	Storage and display (outdoor)	P	P
	Storage, public (outdoor)	P	P
	Store, convenience	P	P
	Studio, motion picture	P	
	Taxicab facility	P	P
	Tire distribution retail/wholesale	P	P
	Truck freight terminal	P <sup>12</sup>	P <sup>12</sup>
	Urban farm	P	P
	Utility:		
	Building or structure	P	P

	Electric generation facility	C <sup>3,12</sup>	C <sup>3,12</sup>
	Sewage treatment plant	C	P
	Solid waste transfer station	C <sup>12</sup>	P <sup>12</sup>
	Transmission wire, line, pipe or pole	P <sup>1</sup>	P <sup>1</sup>
Vehicle:			
	Auction	P	P
	Automobile and truck repair	P	P
	Automobile and truck sales and rental (including large truck)	P	P
	Automobile part sales	P	P
	Automobile salvage and recycling (indoor)	P	P
	Automobile salvage and recycling (outdoor)	C <sup>12,13,14</sup>	P <sup>12</sup>
	Recreational vehicle (RV) sales and service	P	P
	Truck repair (large)	P	P
Vending cart, private property		P	P
Warehouse		P	P
Welding shop		P	P
Wholesale distribution		P	P
Wireless telecommunications facility (see Section 21A.40.090, Table 21A.40.090.E of this title)			

Woodworking mill	P	P
------------------	---	---

Qualifying provisions:

1. See subsection 21A.02.050.B of this title for utility regulations.
2. Subject to Salt Lake Valley Health Department approval.
3. Electric generating facilities shall be located within 2,640 feet of an existing 138 kV or larger electric power transmission line.
4. No railroad freight terminal facility ~~shall~~ may be located within ~~a 5-mile radius of any other existing railroad freight terminal facility~~ one mile of a residential zoning district.
5. Pursuant to the requirements set forth in Section 21A.36.140 of this title.
6. If a place of worship is proposed to be located within 600 feet of a tavern, social club, or brewpub, the place of worship must submit a written waiver of spacing requirement as a condition of approval.
7. Building additions on lots less than 20,000 square feet for office uses may not exceed 50 percent of the building's footprint. Building additions greater than 50 percent of the building's footprint or new office building construction are subject to a conditional building and site design review.
8. A community correctional facility is considered an institutional use and any such facility located within an airport noise overlay zone is subject to the land use and sound attenuation standards for institutional uses of the applicable airport overlay zone within Chapter 21A.34 of this title.
9. No check cashing/payday loan business shall be located closer than 1/2 mile of other check cashing/payday loan businesses.
10. Subject to conformance with the provisions in Section 21A.36.300, "Alcohol Related Establishments", of this title.
11. Subject to conformance to the provisions in Section 21A.40.060 of this title for drive-through use regulations.
12. Prohibited within 1,000 feet of a single- or two-family zoning district.
13. Prohibited within the Eco-Industrial Buffer Area of the Northwest Quadrant Overlay District.
14. Prohibited within the Development Area of the Northwest Quadrant Overlay District.
15. Allowed only within legal conforming single-family, duplex, and multi-family dwellings and subject to Section 21A.36.030.

16. Prohibited within one-half (1/2) mile of any residential zoning district boundary and subject to Section 21A.36.110.

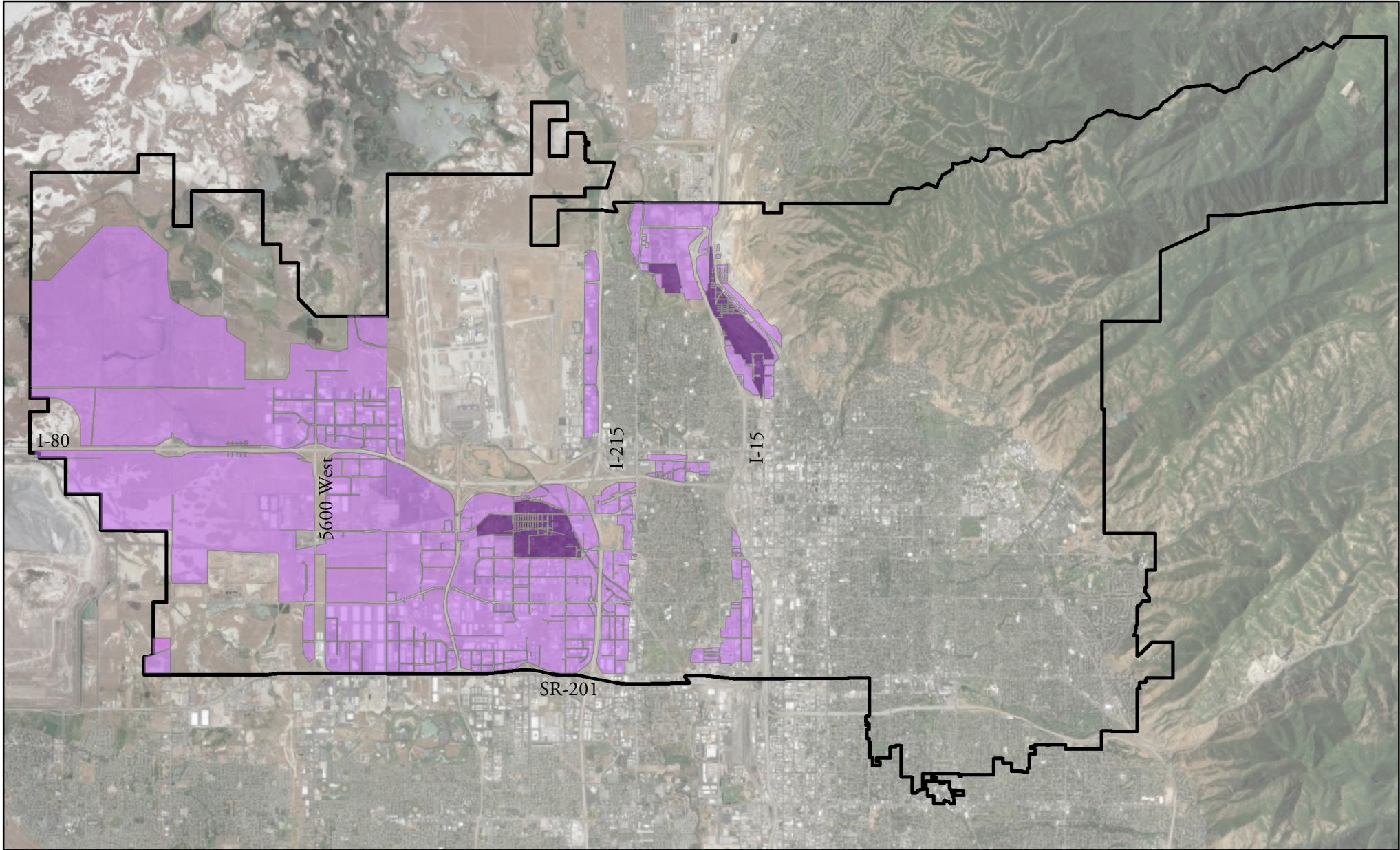
**21A.62.040: DEFINITIONS OF TERMS:**

RAILROAD, FREIGHT TERMINAL FACILITY: A major railroad track yard area ~~for primary use by railroad employees~~ for regional scale interstate mainline oriented intermodal freight transfers of: a) multimodal (sea, rail, truck transport) self-contained cargo containers from train to train, train to semitruck trailer, and semitruck trailer to train loading; and b) for new motor vehicle train transports to semitruck trailer transports for regional distribution purposes. Also includes storage of train vehicles and temporary storage of bulk materials at the facility while the material awaits distribution. ~~No breakdown of self-contained cargo containers occurs at intermodal railroad freight terminal facilities.~~





# **ATTACHMENT B: MAP OF MANUFACTURING ZONES**

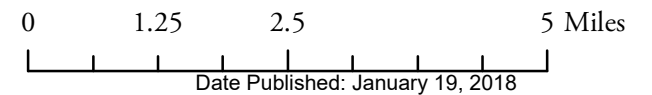
# Manufacturing Zones in Salt Lake City



## Legend

 M-1  City Boundary

 PUM 2017-01038 Global Trade Port Text Amendment



# **ATTACHMENT C: CONDITIONAL USE CHAPTER**

---

## **21A.54.080: STANDARDS FOR CONDITIONAL USES:**

A conditional use shall be approved if reasonable conditions are proposed, or can be imposed, to mitigate the reasonably anticipated detrimental effects of the proposed use in accordance with applicable standards set forth in this section. If the reasonably anticipated detrimental effects of a proposed conditional use cannot be substantially mitigated by the proposal or the imposition of reasonable conditions to achieve compliance with applicable standards, the conditional use shall be denied.

A. Approval Standards: A conditional use shall be approved unless the planning commission, or in the case of administrative conditional uses, the planning director or designee, concludes that the following standards cannot be met:

1. The use complies with applicable provisions of this title;
2. The use is compatible, or with conditions of approval can be made compatible, with surrounding uses;
3. The use is consistent with applicable adopted city planning policies, documents, and master plans; and
4. The anticipated detrimental effects of a proposed use can be mitigated by the imposition of reasonable conditions.

B. Detrimental Effects Determination: In analyzing the anticipated detrimental effects of a proposed use, the planning commission, or in the case of administrative conditional uses, the planning director or designee, shall determine compliance with each of the following:

1. This title specifically authorizes the use where it is located;
2. The use is consistent with applicable policies set forth in adopted citywide, community, and small area master plans and future land use maps;
3. The use is well suited to the character of the site, and adjacent uses as shown by an analysis of the intensity, size, and scale of the use compared to existing uses in the surrounding area;
4. The mass, scale, style, design, and architectural detailing of the surrounding structures as they relate to the proposed have been considered;
5. Access points and driveways are designed to minimize grading of natural topography, direct vehicular traffic onto major streets, and not impede traffic flows;
6. The internal circulation system is designed to mitigate adverse impacts on adjacent property from motorized, nonmotorized, and pedestrian traffic;
7. The site is designed to enable access and circulation for pedestrian and bicycles;

8. Access to the site does not unreasonably impact the service level of any abutting or adjacent street;
  9. The location and design of off street parking complies with applicable standards of this code;
  10. Utility capacity is sufficient to support the use at normal service levels;
  11. The use is appropriately screened, buffered, or separated from adjoining dissimilar uses to mitigate potential use conflicts;
  12. The use meets city sustainability plans, does not significantly impact the quality of surrounding air and water, encroach into a river or stream, or introduce any hazard or environmental damage to any adjacent property, including cigarette smoke;
  13. The hours of operation and delivery of the use are compatible with surrounding uses;
  14. Signs and lighting are compatible with, and do not negatively impact surrounding uses; and
  15. The proposed use does not undermine preservation of historic resources and structures.
- C. Conditions Imposed: The planning commission, or in the case of administrative conditional uses, the planning director or the director's designee, may impose on a conditional use any conditions necessary to address the foregoing factors which may include, but are not limited to:
1. Conditions on the scope of the use; its character, location, hours and methods of operation, architecture, signage, construction, landscaping, access, loading and parking, sanitation, drainage and utilities, fencing and screening, and setbacks; and
  2. Conditions needed to mitigate any natural hazards; assure public safety; address environmental impacts; and mitigate dust, fumes, smoke, odor, noise, vibrations; chemicals, toxins, pathogens, gases, heat, light, and radiation.
- D. Denial Of Conditional Use: A proposed conditional use shall be denied if:
1. The proposed use is unlawful; or
  2. The reasonably anticipated detrimental effects of the proposed conditional use cannot be substantially mitigated as proposed in the conditional use application or by the imposition of reasonable conditions to achieve compliance with applicable standards set forth in this section.
- E. Notice Of Decision: The planning commission, or in the case of administrative conditional uses, the planning director or designee, shall provide written notice of the decision, including all conditions imposed, to the applicant and local community council within ten (10) days of the final action. If the conditional use is approved, this notice shall be recorded against the property by the city recorder. (Ord. 14-12, 2012)

**21A.54.090: CONDITIONAL USE REVOCATION:**

- A. Conditions Of Revocation: The holder of a conditional use shall be responsible for the operation of the use in conformance with the ordinances of the city. Any conditional use approved by the

city may be suspended or revoked by the mayor or the planning commission, upon a finding by the mayor or the planning commission of a violation of any of the following with respect to the holder of the use or its operator or agent:

1. A change in the conditional use approval made without authorization or an amendment; or
  2. Noncompliance with the conditions prescribed upon approval of the conditional use or with representations by the applicant as to the nature of the conditional use to be conducted; or
  3. Operation of the conditional use in a manner that creates a nuisance for neighboring persons or property.
- B. Notice: Written notice of a decision to suspend or revoke the conditional use shall be sent to the holder of the conditional use and posted on the planning division website unless an appeal is filed. If an existing business license is associated with the use, action to suspend or revoke such license shall be undertaken as provided in [title 5, chapter 5.02](#) of this code. (Ord. 14-12, 2012)

## **ATTACHMENT D: ANALYSIS OF STANDARDS**

As per section 21A.50.050, a decision to amend the text of this title or the zoning map by general amendment is a matter committed to the legislative discretion of the city council and is not controlled by any one standard.

<b>Factor</b>	<b>Finding</b>	<b>Rationale</b>
<p><b>1. Whether a proposed text amendment is consistent with the purposes, goals, objectives, and policies of the city as stated through its various adopted planning documents;</b></p>	<p>Complies</p>	<p>One of Plan Salt Lake’s Guiding Principles includes “A balanced economy that produces quality jobs and fosters an environment for commerce, local business, and industry to thrive”. In addition, Plan Salt Lake identifies the following initiatives within the Economy section of the plan: “Create an industrial fulfillment center” and “Support the growth of the industrial areas of the city.” The proposed ordinance would promote the expansion of Salt Lake City’s industry and economy.</p> <p>The Northwest Quadrant Master Plan envisions the area to be an economic engine for the City, region, and State as well as balance the nearby sensitive areas near the Great Salt lake. The proposal addresses allows for economic development opportunity and through the conditional use process ensures that the environmental sensitives are protected once a development proposal is submitted.</p> <p>The 1993 Salt Lake City Strategic Plan includes the following: “Salt Lake City sustains a vibrant local economy that takes full advantage of its competitive geographic advantages for tourism, distribution, communications, and transportation.” The proposed changes allows Salt Lake City to take full advantage of its competitive geographic advantage for distribution and transportation by making it easier for an global</p>

		<p>trade port to locate within Salt Lake City.</p> <p>The proposed changes are consistent with City purposes, goals, and policies.</p>
<p><b>2. Whether a proposed text amendment furthers the specific purpose statements of the zoning ordinance;</b></p>	Complies	<p>Amendments to support the development of a global trade port furthers the following purpose statement of the zoning ordinance: “Foster the city’s industrial, business, and residential development.”</p> <p>The proposed changes allows for continued growth of the city’s industrial and business sectors, which fosters the City’s industrial and business development.</p>
<p><b>3. Whether a proposed text amendment is consistent with the purposes and provisions of any applicable overlay zoning districts which may impose additional standards;</b></p>	Complies	<p>The proposed text amendment is not associated with any specific overlay zoning district or development project. It is not anticipated that the proposed changes will have any impact on any overlay districts. Any future development would need to comply with applicable zoning overlay regulations.</p>
<p><b>4. The extent to which a proposed text amendment implements best current, professional practices of urban planning and design.</b></p>	Complies	<p>The proposed changes take into account activities that would occur with a railroad freight terminal facility. The proposed changes amends the definition to better reflect how railroad freight terminal facilities operate today and addresses cranes and associated offloading structures that are necessary for the operation of a railroad freight terminal facilities.</p> <p>The changes makes the ordinance more practical and easier to implement, which improves the overall ordinance.</p>

		<p>Air quality is a major concern in Salt Lake City and it is within best practices to maintain railroad freight terminals as a conditional use given potential concerns such as air quality and impacts on adjacent properties. The conditional use process allows for analysis of potential detrimental impacts and allows the City to impose conditions to mitigate those impacts.</p>
--	--	---



## **ATTACHMENT E: PUBLIC PROCESS AND COMMENTS**

The following is a list of public meetings that have been held, and other public input opportunities, related to the proposed project:

### **Community Council Notice:**

Notices were sent to all recognized community organizations regarding the proposed text changes on December 8, 2017. Staff provided the organizations with information regarding the proposed changes and the Open House. The Westpointe Community Council submitted comments/questions that can be found below.

### **Open House:**

Because this zoning amendment impacts the entire city and not just a specific community council, an open house was held on January 3, 2018 at the City and County Building. Approximately nine individuals showed up at the Open House.

All recognized community based organizations were notified of the open house. Representative from the Westpointe Community Council attended the Open House and provided written comments (found below).

### **Planning Commission Notice of the public hearing for the proposal included:**

Public hearing notice published in the newspaper on January 13, 2018.

Public notice posted on City and State websites and Planning Division list serve: January 11, 2018.

Notices sent to current railroad freight terminal facility: January 11, 2018

### **Public Input:**

Five people/groups have provided comments regarding the proposal as of the published date of the staff report.

Public comments are found below.

# WESTPOINTE COMMUNITY COUNCIL COMMENTS REGARDING PROPOSED INLAND PORT ZONING AMENDMENTS

## **What is the project?**

There has been much economic interest from the state and city levels to have a global trade port (aka railroad freight terminal facility) in Salt Lake City due to Salt Lake's unique advantageous location near rail, interstates, and the airport. A global trade port is a transportation facility that moves goods in for distribution or warehousing and also moves goods out for transportation elsewhere. These ports can help move international freight more efficiently inland for distribution instead of relying solely on a coastal port.

## **Purpose:**

The purpose of amendment is to allow for the development of a global trade port in M-1 (light) and M-2 (heavy) manufacturing zones in Salt Lake City and to further promote the economic development of the Northwest Quadrant.

## **Proposed Changes:**

- Removing a restriction in the land use table that prohibits a railroad freight terminal facility from being located within 5 miles of another such facility. Currently Salt Lake City has one other railroad freight terminal facility located at approximately 1045 So. 5500 West and covering about 240 acres. The location of the proposed global trade port has not been determined but there has been a lot of discussion about placing one within the Northwest Quadrant area of the City. (See 21A 33.040 amendment to qualifying provision #4–pg. 11)
- Increasing the distance from residential zoning by prohibiting a railroad freight terminal facility within 1 mile of any residential zoning district. Current qualifying provision # 12 prohibits a rail freight terminal within 1,000 feet of a single or two-family zoning district. (refer to page 8 and 12) Potential sites must be at least one mile from a residential zoning district.
- Clarifies the definition of “railroad freight terminal facility” so it is not limited to “to primary use by railroad employees.” Also expands the definition of such a facility so that it includes “the storage of train vehicles and the temporary storage of bulk materials at the facility as it awaits distribution.” Current definition prohibits the breakdown of self-contained cargo containers. (Refer to 21A.62.040 pg. 12)
- Allowing grain silos and railroad repair shops as permitted land uses in the M-1 manufacturing zones. Currently such facilities are only allowed in M-2 heavy manufacturing areas. (Refer to 21A.62.040 pg. 7 & 8)
- Adds language that allows cranes associated with a railroad freight terminal to be up to a height of 85 feet. Current M-1 zoning provisions prohibits any building exceeding 85 feet in height in the M-1 zone near the International Airport. Current M-2 zoning provision prohibit any building exceeding 80 feet in height excepted for chimneys and smoke stacks up to 120 feet. (Refer to 21A.28.020 F (1-2) pg. 2 and 21A.28.030 pg. 4)

## Questions and Concerns Raised by Members of Westpointe Community Council:

1. M-1 zoning provides “an environment for light industrial uses that produce no appreciable impact on adjacent properties, that desire a clean attractive industrial setting and that protects nearby sensitive lands and waterways.” (21A.28.020) Please explain why a large global trade port/railroad freight terminal would be appropriate for this type of zoning? Also, why are railroad repair shops and grain elevators being allowed in M-1 zones rather than continuing to be restricted to M-2 heavy manufacturing zones?

The M-1 zone applies to a large area within Salt Lake City that is not just restricted to the area north of I-80. The railroad freight terminal facility is a conditional use and the impacts of the details of the use would be able to be examined to determine whether the proposal has any detrimental impacts. The full impact and details of a development of a global trade port will not be fully known until a detailed proposal is submitted. The conditional use process allows for a thorough review of a global trade port to ensure the project will not have detrimental impacts that can't be mitigated.

A provision has been added to provide a one mile buffer from residential uses to mitigate impacts. In addition, the area north of I-80 within the Northwest Quadrant Overlay contains additional development standards that address landscaping, glass treatments, lighting, and fencing, to help mitigate impacts to the sensitive areas.

Railroad repair shops and grain elevators are low impact uses and are similar in impact to the other uses permitted within the M-1 zoning district.

2. The expanded definition of “railroad freight terminal facility” does not define “temporary” storage nor outline what kind of “bulk materials” could be stored onsite. Such lack of specificity leaves many questions unanswered and opens the door to potential abuse.

This is a reason why we are making the railroad freight terminal facility a conditional use. The City wants to ensure that we know the type of impacts of a specific development and make sure a development would not create any detrimental impacts.

Please refer to the staff report for additional information. Specifically, the Proposed Text Amendments and Considerations section.

Multi-commodity bulk terminals often require an “anchor tenant” to make the terminal financially feasible. What anchor tenants (and their bulk materials) would be considered?

There has not been a development application for a global trade port/inland port submitted. These are the details that would be a part of a proposed development. The proposed changes are to amend the zoning to allow for a potential global trade port to locate within Salt Lake City.

3. Why are the current qualifying zoning provisions related to restrictions within the Northwest Quadrant Overlay District (#13 & #14) not attached to the conditional use zoning for the proposed railroad freight terminal facility?

Qualifying provisions #13 Prohibits a use within the Northwest Quadrant Eco-Industrial Buffer Area and provision #14 prohibits a use within the Northwest Quadrant Development Area. A railroad freight terminal is a conditional use that will be examined in greater detail once a detailed development has been submitted. In addition, the area north of I-80 within the Northwest Quadrant Overlay contains additional development standards to mitigate impacts to the sensitive areas.

Please refer to the staff report for additional information. Specifically, the Proposed Text Amendments and Considerations section.

4. Why does the current zoning prohibit the break-down of self-contained cargo containers? How does eliminating this provision impact the operation of the existing railroad freight terminal?

The reason that language is currently included in the definition is unknown. The language is proposed to be amended because the breakdown of cargo may be a necessary component of the customs process for a global trade port.

5. What is the anticipated operating relationship between the current railroad freight terminal and the proposed global trade port? What would be the combined impact of two such facilities on west side neighborhoods? On Salt Lake Valley air quality?

Currently, there is not a specific development for a global trade port. Concerns regarding impacts of the use has been raised. Please see above for reasons why we are this is being considered as a conditional use.

Please refer to the staff report for additional information. Specifically, the Proposed Text Amendments and Considerations section.

6. Why is it good public policy to allow a railroad freight terminal a mile away from residential housing?

The mile distance requirement from residential is to help mitigate any potential impacts from the proposed use. The current distance requirement is 1,000 feet. The mile distance provides a larger buffer from these uses. The mile distance comes from a public policy recommendation from a study in California regarding impacts of rail yards.

## Tran, Tracy

---

**From:** Dan Potts [REDACTED]  
**Sent:** Thursday, January 11, 2018 12:51 PM  
**To:** Tran, Tracy  
**Subject:** Re: Thank you for Global Trade Port Summary of Changes

**Categories:** To Do

Tracy,

Also not a Westpointe resident (but Poplar Grove CC member).

The 97-year-old non-profit, Salt Lake Fish and Game Foundation that I represent, would, however, recommend that SLC's Mosquito Abatement consider more holistic, forward-looking best practices to deal with what is likely to become a very serious problem for this poorly relocated facility.

Working towards working WITH nature, instead of AGAINST it

should prove to be far more environmentally sensitive (as per Audubon's comments), and likely more effective.

The promotion and integration of native birds, bats, fish, and amphibians into Abatement's narrow perspective

would go far towards the incorporation of better best practices for this particular area.

As a visitor to that area for more than 40 years,

I cannot even imagine how bad the mosquito problem could be on site (day or night),

especially after challenging weather conditions during the more problematic times of the year!

It can be HORRIBLE, as a function of the wind blowing in insects that were produced many miles away.

Having onsite critter defense of adult flying insects should at least help.

Just sayin',

Dan Potts, Secretary, SLF&GF

PS. Plus, one of our Directors recently found a burrowing owl nesting site a short distance from the site!

---

**From:** Tran, Tracy <Tracy.Tran@slcgov.com>

**Sent:** Tuesday, January 9, 2018 3:39 PM

**To:** Dorothy Owen

**Cc:** Westpointe CC Chair; 'Ray Wheeler'; 'Dan Potts'; [REDACTED]; 'Bobbie Brooks'; 'Marlene Jennings'; Westpointe CC Chair

**Subject:** RE: Thank you for Global Trade Port Summary of Changes

Hi Dorothy,

I need comments by January 16, 2017. However, the sooner I can get the comments, the better.

Thanks,

TRACY TRAN  
Principal Planner

PLANNING DIVISION

January 16, 2018

Salt Lake City Planning Commission  
P.O. Box 145476  
Salt Lake City, UT 84114-5476

Sent: Via e-mail  
% Tracy Tran, Principal Planner, Salt Lake City Corporation

Re: **Comments on the December 21, 2017 Draft Text Amendment – Global Trade Port in Manufacturing Zones – 21A.28.020**

Dear Members of the Salt Lake City Planning Commission:

Thank you for the opportunity to provide comment on the above-referenced draft zoning text amendment concerning Global Trade Port in Manufacturing Zones. *National Audubon Society* and *Great Salt Lake Audubon* are joined in these comments by *FRIENDS of Great Salt Lake, South Shore Wetlands and Wildlife Management, Inc.*, and *League of Women Voters of Salt Lake*.

We understand there is interest within the State of Utah in developing a global trade port (sometimes referred to as an inland port). It appears that the zoning text amendments as currently proposed may be intended to apply in manufacturing zones city-wide, including the Northwest Quadrant (NWQ). Our organizations and many members have actively engaged with city representatives during the development of the NWQ Master Plan to try and ensure that the special nature of the environment adjacent to Great Salt Lake was taken into account in the NWQ Overlay. Our concerns have focused on ensuring that development in this area does not create unacceptable or unmitigated negative impacts to the important ecological and economic interests of Great Salt Lake, associated wetlands and water resources, birds, brine shrimp, brine flies and other biological resources.

In that light, we respectfully request the Planning Commission to consider the following comments and requests concerning the proposed text amendments to Salt Lake County Zoning Ordinances 21A.28.020 for Global Trade Port in Manufacturing Zones.

We urge the Commission to recommend excluding the uses: (i) “Railroad, freight terminal facility” and (ii) “Railroad, repair shop” from being located within either the or Eco-Industrial Buffer zones Development Area (M-1) of the NWQ overlay in the area north of the current I-80 footprint. For reasons explained in more detail below, we specifically request that:

1. Qualifying Provisions 13 and 14<sup>1</sup> be added to the “Conditional” use designation for the “Railroad, freight terminal facility.”
  - a. We recognize there is much pressure on the City to make the proposed changes, but at a minimum, we request that the conditional use Qualifying Provision 14 be included at least until such time as the environmental impacts of a global trade port facility in proximity to Great Salt Lake are further studied and ways of minimizing impacts are better understood. Regardless, Qualifying Provision 13 (prohibited in eco-industrial buffer zone) should apply permanently.
2. The proposed “Permanent” designation for “Railroad, repair shop” for M-1 zones be rejected and that the current non-permitted use status in M-1 zones be retained.
  - a. At a minimum, we request that the use designation for “Railroad, repair shop” be no more than a “Conditional” use for M-1 zones, with appropriate Qualifying Conditions.
  - b. Additionally, we request that if either a “Permanent” or “Conditional” use is retained for “Railroad, repair shop” in M-1, that Qualifying Provisions 13 and 14 (or a new Qualifying Provision e.g., 14a restricting development in the NWQ north of I-80) be added to the designation.

### Rationale

The existing zoning ordinances specify that *“The purpose of the M-1 light manufacturing district is to provide an environment for light industrial uses that produce no appreciable impact on adjacent properties and desire a clean attractive industrial setting.”* SLC Zoning Ordinances 21A.28.020(A). Although railroad and freight terminal facilities were previously defined in relevant ordinance and listed as a conditional use in M-1 and M2, the proposed text amendments to the ordinance and the nature and magnitude of “global trade port” or “inland port” facilities being contemplated in various regional study efforts are not the type that had been envisioned as light industrial uses in the development area of the NWQ overlay north of I-80. Moreover, railroad repair shops were never contemplated for any M-1 zones, and particularly in the NWQ north of I-80.

Although to our knowledge, Salt Lake City has not been asked to consider a specific proposal, in an article in *Industry Today / US Translation Company* by Jacob Andra, *“An Inland Port in Utah? A Salt Lake City inland port is in the discussion phase, but is it a good idea?”*,<sup>2</sup> the following description highlights the potential magnitude of an inland / global trade port in Salt Lake City.

*“An inland port would multiply Utah’s cargo and goods traffic many times over, making current volumes appear miniscule in comparison. Salt Lake City would sit on one end of a logistics barbell, with a seaport on the other end; a robust rail line would form the “handle” connecting the two ports. Incoming containers would bypass customs at the seaport, traveling straight for the inland*

<sup>1</sup> Qualifying Provisions 13 and 14 provide: “13. Prohibited within the Eco-Industrial Buffer Area of the Northwest Quadrant Overlay District. 14. Prohibited within the Development Area of the Northwest Quadrant Overlay District.”

<sup>2</sup> <https://industrytoday.com/article/inland-port-utah/> (Last accessed January 2018).

*port instead of being parceled out. At Salt Lake City, containers would be unloaded and all goods would clear customs. Post-customs, goods could be warehoused and shipped on via rail, air, or truck.*

*Naturally, the inland port would be a massive operation — some inland ports handle “as much cargo volumes as their coastal counterparts,” per a report by Jones Lang LaSalle — and would demand a significant infrastructure investment. We’re talking about dockyard cranes. Vast storage capacities. Clearinghouses. A foreign trade zone. Major surface road access to the port. And much more. Additionally, environmental impacts must be factored.”*

The August 2016 Research Brief, “Salt Lake Inland Port Market Assessment,” prepared by the Kem C. Gardner Policy Institute of the University of Utah also notes that: *“Because of the state of Utah and Salt Lake City’s commitment to improving air quality, the environmental impact of a proposed inland port deserves in-depth research and analysis.”* Air quality is a serious issue that should be considered by the City in any of its deliberations concerning zoning and siting of “global trade ports” within the city boundaries. And, air quality is just one of the many health and environmental issues associated with the siting and operation of such facilities.

For the area north of I-80 in the NWQ, other potential environmental impacts from a global inland port and railroad facilities, although not fully known, could create substantial risks to the millions of migratory birds and other important ecological resources that rely on Great Salt Lake and the wetlands in this vicinity. Just a few of these issues are discussed in this letter.

For example, noise, lighting, increased traffic and congestion associated with such facilities would most likely negatively affect birds and other wildlife in the area. Additionally, permanent tall (85’) crane operations can pose a bird collision hazard, particularly in the vicinity of Great Salt Lake, which supports millions of migratory birds.

Moreover, a global trade [inland] port typically is *“[d]esigned to move international shipments more efficiently and effectively from maritime ports inland for distribution.”*<sup>3</sup> The nature of a global inland port business model<sup>4</sup> and its size, could potentially increase the risk of introducing invasive species (plants,

<sup>3</sup> Jones Lang LaSalle, “Emergence of the inland port.” <http://www.us.jll.com/united-states/en-us/pages/research-industrial-wp-inland-ports.aspx> (Website, last accessed January 2018, but underlying report inaccessible.)

<sup>4</sup> The August 2016 Research Brief in its description of the “essential characteristics of an inland port” explains that *“We define an inland port as a site located away from traditional land, air, and coastal borders that contains a portfolio of multimodal transportation assets and the ability to allow global trade to be processed and altered by value-added services as goods move through the supply chain. [Citation omitted.] An inland port can also fulfill many additional beneficial functions, such as a satellite customs clearance terminal, intermodal distribution facility, and a customs pre-clearance for international trade.”* August 2016 Research Brief, “Salt Lake Inland Port Market Assessment,” prepared by the Kem C. Gardner Policy Institute of the University of Utah. <http://gardner.utah.edu/wp-content/uploads/2016/10/IP-Brief-FINAL.pdf> (Last accessed January 2018).



insects, rodents, and aquatics).<sup>5</sup> Increased risk of invasive species could have particularly serious negative consequences for the ecological balance of the area in the NWQ near Great Salt Lake and its wetlands and potentially for other aspects of the city's infrastructure.<sup>6</sup>

The proposed zoning text amendments also would allow *“storage of train vehicles and temporary storage of bulk materials while the material waits distribution.”* The potential for storage (even temporarily) of bulk materials such as chemicals or petroleum products is of great concern. Spills or major releases of chemicals or petroleum products could have serious consequences for the ecology of the area. A major chemical or petroleum release entering the wetlands or Great Salt Lake could be devastating for birds, for brine shrimp, brine flies, other macro-invertebrates, phyto-plankton or other food sources that are important not only to birds, but also economic interests like the brine shrimp industry.

Hydrologic impacts to water sources for the wetlands and Great Salt Lake also need to be carefully considered. There also are many geologic risks (e.g., liquefaction, flooding) that would particularly make siting a large global trade port or railroad repair shop in the NWQ north of I-80 a concern given the types of materials that likely would be handled at such facilities. (See, Utah Geologic Survey, Geologic Hazard Maps – Salt Lake County.)<sup>7</sup>

## Conclusion

We have appreciated the City's willingness to consider our concerns and suggestions throughout the process of developing the NWQ Master Plan. The proposed zoning ordinance text amendments for the global trade port facilities also could affect the NWQ in ways not fully contemplated during previous discussions and we urge the Planning Commission to act favorably on our comments. We are willing to discuss our concerns in more detail with the Planning Commission or planning staff.

Additionally, while there is much discussion about the potential economic and trade aspects of such facilities, we urge the City, the Planning Commission and the Council to take steps to gain a better understanding of the potential environmental and social impacts of “global trade port” facilities and also help the public to do so, well before the City is faced with a specific proposal.

<sup>5</sup> “[The rapid movement of shipping containers on trucks and railroad cars facilitates the movement of invasive species from ports to the rest of the country (Levinson 2006). Inland distribution centers being developed in Kansas City, MO; Columbus, OH; Tennessee, and other inland locations will likely become focal points for invasive species introductions in the future.” A Dynamic Invasive Species Research Vision: Opportunities and Priorities 2009–29, *“Invasive Species and Disturbances: Current and Future Roles of Forest Service Research and Development”* Mary Ellen Dix, Marilyn Buford, Jim Slavicek, Allen M. Solomon, and Susan G. Conard. [https://www.fs.fed.us/research/docs/invasive-species/wo\\_gtr79\\_83/wo\\_gtr79\\_83\\_091.pdf](https://www.fs.fed.us/research/docs/invasive-species/wo_gtr79_83/wo_gtr79_83_091.pdf) (Last accessed January 2018).

<sup>6</sup> See for example, *“Invasive Species Impacts on Infrastructure,”* Invasive Species Advisory Committee, U.S. Department of the Interior, December 6, 2016. <https://www.doi.gov/invasivespecies/invasive-species-that-impact-infrastructure> (Last accessed January 2018).

<sup>7</sup> <https://geology.utah.gov/map-pub/maps/geologic-hazard-maps/#toggle-id-18>

Thank you for considering these comments.

Sincerely,

*Marcelle Shoop*

Marcelle Shoop  
Director, Saline Lakes Program  
National Audubon Society

cc:

Tracy Tran, Principal Planner, Salt Lake City Corporation  
Heather Dove, President, Great Salt Lake Audubon  
Deb Drain, Conservation Chair, Great Salt Lake Audubon  
Lynn De Freitas, Executive Director, Friends of Great Salt Lake  
Ann O'Connell, League of Women Voters of Salt Lake

To: Salt Lake City Planning Division  
Salt Lake City Planning Commission

From: Jan Striefel, FASLA, FAICP

Re: Comments on Proposed Change to Light Manufacturing Zone Allowing a Global Trade Port/Inland Port

Thank you for the opportunity to provide comment regarding this very important, but distressing change.

The Global Trade Port/Inland Port is inconsistent with the intent of a Light Industrial Zone and more suited to a Heavy Industrial Zone. The use is too intensive and large-scale, the potential for pollution to the nearby sensitive lands and conservation areas is very high due to the nature of the uses proposed, the scale of the potential development is inconsistent with the other light industrial uses, and it violates the intent of the North West Quadrant Master Plan which acknowledges the sensitive nature of the area, the wildlife impacts that will occur, and the hard work and compromises that resulted from the process. I strongly oppose this change to the Light Manufacturing Zone, particularly in the Northwest Quadrant Planning Area.

This change might be accommodated on the south side of I-80, but not on the north side. If the Global Trade Port/Inland Port is approved in the Light Industrial Zones, lands within the Northwest Quadrant north of I-80 should be excluded. I strongly object to this change and believe that its consideration violates the good faith and sense of collaboration by all parties in the planning and development of the NWQ Master Plan.

The Mayor is misguided in proposing this change that disregards all of the prior good work.

Sincerely,

Jan Striefel, FASLA, FAICP  
1449 East 1700 South  
Salt Lake City, UT 84105



---

January 18, 2018

Salt Lake Planning Commission  
P.O. Box 145476  
Salt Lake City, UT 84114-5476

Sent: Via Email

C/O: Tracy Tran, Principal Planner

Re: Text Amendment – Global Trade Port

Dear Planning Commission,

My name is Lance Bullen I represent NWQ LLC, we together with Rio Tinto own the majority of property within the development area established by the City of Salt Lake that has been recently rezoned and entitled for industrial use.

First and foremost, allow me to express my gratitude and appreciation for the City and Staff that has worked tirelessly to create a truly unique opportunity for the City to become a leader in the global logistics supply chain.

As we know and understand today the way consumers are choosing to purchase goods online has fundamentally changed how commerce flows in and out of our cities and to our doorsteps. This is hardly just a trend and will continue to become the norm, it is likely that as much as 50% of our consumer goods purchased could occur online (current estimates are around 12%-15% of goods are purchased online). Naturally it follows that as online commerce grows so does the network of supply chain logistics to accommodate this rapid expansion in consumer behavior.

Salt Lake City from the very beginning of statehood has been the literal “Crossroads of the West.” Most people think of I-80 and I-15 as the crossroads in this sense or more specifically vehicular and truck traffic being the most recognized mode of transit. I would like to supplant this idea of roads being the crossroads to rail playing an even more significant crossroads in our city. Salt Lake has direct rail service from all three of the major west coast ports. It has a more strategic location from a rail perspective than it does from a road perspective. It is our opinion that the current rail infrastructure in the City is not adequate to handle the burden of logistics growth that will continue to tax our City’s roads and utility infrastructure.

1201 E. Wilmington Ave. Suite 115, Salt Lake City, Utah 84106  
Phone: 801.961.1121; Facsimile: 801.961.1125

We as a City must begin to confront the idea that roads alone are not the best sustainable solution to handle the increased traffic of logistics and commerce. We as a development partnership are deeply concerned with the air quality and livability of our City. In fact, we are a local development team, all of us live and work here, our children go to school here, one of the reasons we are so passionate about the Northwest Quadrant is because it has the potential to become an industry leading sustainable rail-served logistics park. This is why we are in support of the text amendment, it creates in our professional opinion the right list of entitlements to encourage more rail service in perhaps the only area of the City that is not impacted adversely by rail expansion.

Please contemplate the following information and perspectives as you listen to concerns being raised by constituents in our community.

1. If the type of rail operations allowed under the text amendment are not recommended and approved by the City Council the Northwest Quadrant will become almost exclusively a truck served logistics center not dissimilar to many other logistics corridors within our City that are known for congestion and heavy truck use. For 30 years we have been told that rail expansion is not worth the effort and cost. My question is simply in what other instance will the Planning Commission be given the opportunity to encourage rail expansion in a way that doesn't further encumber road crossings and burden existing city infrastructure? One must ask themselves this question in considering the ramifications of rail expansion in our City; "at what cost will the burden of increased non-rail traffic be placed on the City's roads and communities?" Is this inevitable cost worth the environmental burden to not engender a rail friendly community overall and what benefits inure to the City at large because this area of the City will become the nexus for rail terminals and operations?
2. In every instance that I have participated in NWQ planning, public commentaries and economic development summits, rail has always been a key focal point for this region of the City. Furthermore, in all of the City planning content commissioned by JLL and other third-party consultants rail is depicted as a major mode of transit throughout the development area. It is our opinion along with the City staff that the proposed text amendments clarify the role of rail infrastructure that has been represented in public documents indicating rail facilities North of I-80.
3. We are sensitive to the environmental concerns that are being discussed about rail located North of I-80. Ironically the existing 5-mile radius restriction on rail facilities would mean that the only area that could be built as a rail facility would be the furthest northern section of the NWQ immediately adjacent to some of the most sensitive natural areas. Ideally the anticipated facility would be buffered by buildings that are strategically located proximate to rail to minimize the drayage costs and reduce carbon emissions (the cost to move freight from rail to building). Once again if rail terminal facilities are not located north of I-80 the average short haul distance would triple causing extensive burden to city road infrastructure (think 5600 west, California Avenue traffic from 201 to I-80 and multiply it exponentially).

4. The planning and building of these facilities can take years and require sizable public and private investment. Even with the planning and zoning approvals we are convinced that only with sustained collaboration with our partner the City of Salt Lake will we be able to locate and eventually construct a facility.
5. One modern unit train delivering containers of goods for distribution can remove as many as 280 trucks off of the same route. Rail freight transportation is more efficient than truck freight transportation from an environmental and economic perspective. Trains are capable of moving one ton of freight 500 miles on a single gallon of fuel. Rail is four times more sustainable and environmentally friendly than trucking. If just 5.00% of freight moved by truck traveled by rail instead, greenhouse gas emissions would fall by approximately nine million tons. <https://www.aar.org/todays-railroads/sustainability>
6. Modern rail operations are the hallmark of efficiency and sustainability. In many cases these facilities have all-electric cranes producing zero on-site emissions.
7. Modern rail standards require welded continuous rail and seamless pavement yards that greatly reduce noise and ensure best practices with respect to storm water treatment and runoff protocols.
8. Modern rail facilities also feature dark skylighting decreasing glare and transient lighting that has the potential to impact natural habitats.
9. We as a development partnership have successfully negotiated a development agreement whereby we are partners with the City of Salt Lake and together we will create development areas based on City guidelines and standards that will not adversely impact the sensitive nature of the natural areas around the development zone of the northwest quadrant.
10. Our partnership efforts have led to the dedication of as many as 4,000 acres of sensitive critical habitat to preservation, and encouraged and supported a 400 ft. eco buffer of transition from development to sensitive lands.
11. The railroad industry has federal environmental oversight. The Surface Transportation Board (STB) is an independent adjudicatory and economic regulatory agency commissioned by congress. This agency has environmental rules that implement various environmental statutes that include the National Environmental Policy Act (NEPA). The Federal Railroad Administration (FRA) implements federal environmental laws and policies related to the nation's railroads. FRA participates in domestic forums covering a wide range of environmental issues including hazardous materials safety, noise, invasive species, climate change and community livability. FRA strives to provide information and resources for environmentally sound planning and development of the nation's railroad system, and also conducts environmental impact assessments of pending actions and projects. FRA also maintains working relationships with rail transportation carriers, non-governmental organizations, and other rail related organizations.

It is without hesitation that I recommend that the planning commission recommend the text amendment for approval by City Council. I am certain that rail is the right answer at the right time for the City. I honestly feel that we will collectively look back to this time many years from now with a sense of pride that we chose solutions that had the most potential for environmental sustainability. At the end of the day we all want what is best for our

community and I am certain that we as a City need rail to expand in order to maintain the quality of life we desire.

Respectfully,

Lance Bullen  
NWQ, LLC



## **ATTACHMENT F: DEPARTMENT REVIEW COMMENTS**

Input was requested from all pertinent city divisions and departments. The following comments were received from other city divisions/departments with regard to the proposed text amendment:

**Airport:** I read several times the proposed text amendments for the M-1 and M-2 zone. These seem to work well for the airport interests relating to the zoning. I have two simple recommendations as follows.

In the M-1 Light Manufacturing District:

### F. Maximum Height

- 1) . . . within the AFPP overlay district which exceeds fifty feet (50) ~~will~~ **may** also require site specific approval from the federal aviation administration.
- 2) . . . (85') in height and are **also** subject to the Airport Flight Path Protection (ARPP) overlay district . . .

The FAA may require their review, but depends on the distance from the nearest runway and proposed height of the structure. Thank you for providing the proposed text amendments for comment.

--Allen McCandless

*Planning Staff Note: the proposed text amendments reflect these recommendations*

**Building Services/Zoning:** Building Services has identified no issues with the proposed amendments.

**Economic Development:** No comments received.

**Engineering:** Engineering has no comment.

**Police:** No comments received.

**Public Utilities:** No comments received.

**Transportation:** No objections from Transportation

**Sustainability:** The railroad freight terminal needs to be kept as a conditional use to ensure that all potential environmental impacts are reviewed and mitigated if one is developed. Technology is rapidly advancing, and it will be important to ensure that facilities developed in the City have equipment and processes that minimize emissions into our airshed. The area is already designated as "serious" for nonattainment of air quality standards, so any new businesses should not significantly add pollutants to the air. In addition, the region is a



sensitive one with regards to migrating birds, so a detailed analysis to ensure that are no negative impacts should be completed.