



# Staff Report

PLANNING DIVISION  
COMMUNITY & NEIGHBORHOODS

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**TO:** Salt Lake City Planning Commission  
**FROM:** Lauren Parisi, Principal Planner  
**DATE:** June 26<sup>th</sup>, 2019  
**RE:** PLNPCM2019-00313 - Text Amendments to the RMF-30  
Low Density Multi-Family Residential Zoning District

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## ZONING TEXT AMENDMENT

**PROPERTY ADDRESS:** City-Wide

**PARCEL ID:** N/A

**MASTER PLAN:** Growing SLC: A Five Year Housing Plan 2018-2022 / Plan Salt Lake

**ZONING DISTRICT:** RMF-30 Low Density Multi-Family Residential

**REQUEST:** A request by Mayor Jackie Biskupski to review the zoning standards of the RMF-30 Low Density Multi-Family Residential District and propose amendments in an effort to remove zoning barriers to housing development as recommended within *Growing SLC: A Five Year Housing Plan (2018-2022)*. The proposed text amendments to the RMF-30 District include:

1. Introducing design standards for all new development
2. Allowing the construction of new building types including side oriented row houses, cottage developments, and tiny houses without special approval
3. Reducing lot size requirements
4. Removing lot width minimums
5. Allowing more than one building on a lot without planned development approval
6. Granting a unit bonus for the retention of a structure on a lot
7. Introducing a maximum lot width for newly created lots

**RECOMMENDATION:** At this time, staff recommends that the Planning Commission table petition PLNPCM2019-00313 regarding updates to the RMF-30 Low Density Multi-Family Residential Zoning District and make a recommendation to City Council at a later date once the proposed text amendments have been finalized.

**ATTACHMENTS:**

- A. [Proposed Text Amendments](#)
- B. [Informational Maps](#)
- C. [Analysis of Standards](#)
- D. [Public Process and Comments](#)
- E. [City Department Comments](#)

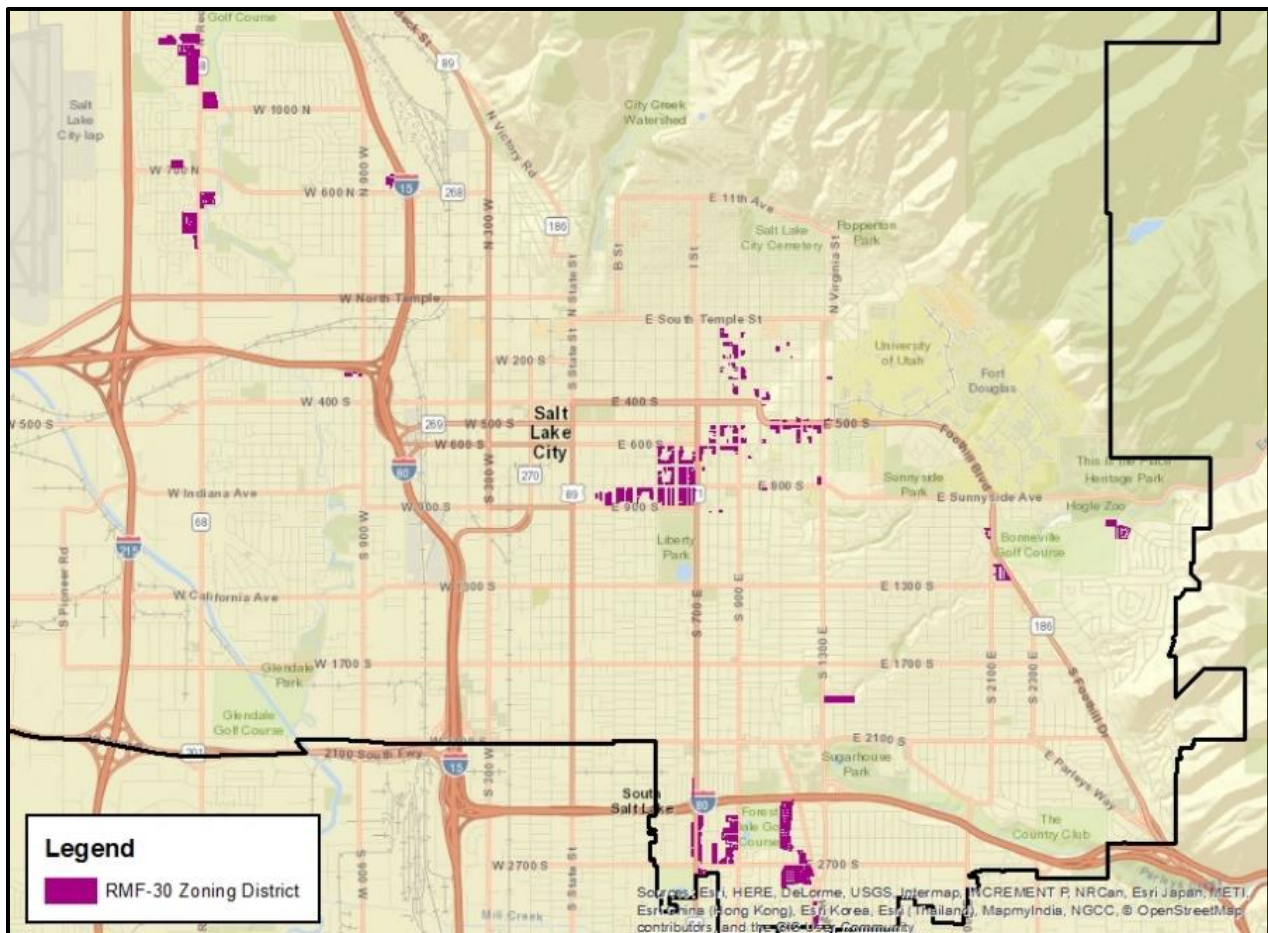
## PROJECT DESCRIPTION:

The purpose of this project is to review the zoning standards within the RMF-30 Low Density Multi-Family Residential District and propose amendments in an effort to remove zoning barriers to housing development as recommended within *Growing SLC: A Five Year Housing Plan (2018-2022)*. For some time, staff has recognized that many of the zoning standards within the city's four multi-family residential (RMF) zoning districts can be quite restrictive and limit creative housing development, which is why these amendments are being proposed starting the lowest density RMF-30 district. The goal is to solidify changes to this multi-family district first, and apply similar changes to the rest of the multi-family districts in the near future.

## A Closer Look at RMF-30.

The majority of Salt Lake City's RMF-30 districts are scattered throughout the northern center of the City – north of Liberty Park, east of the Downtown and west of the University of Utah. There is also a large concentration of RMF-30 just south of I-80 off of 700 East. City data indicates there are approximately:

- 1,028 RMF-30 parcels .06 acres (2,613 square feet) or greater – *large enough to build upon*
- 331 RMF-30 are located in a local historic district where the demolition of historic structures must be approved by the Historic Landmark Commission
- 3,212 parcels .06 acres or greater *in all* RMF-30, -35, -45 and -75 zoning districts.



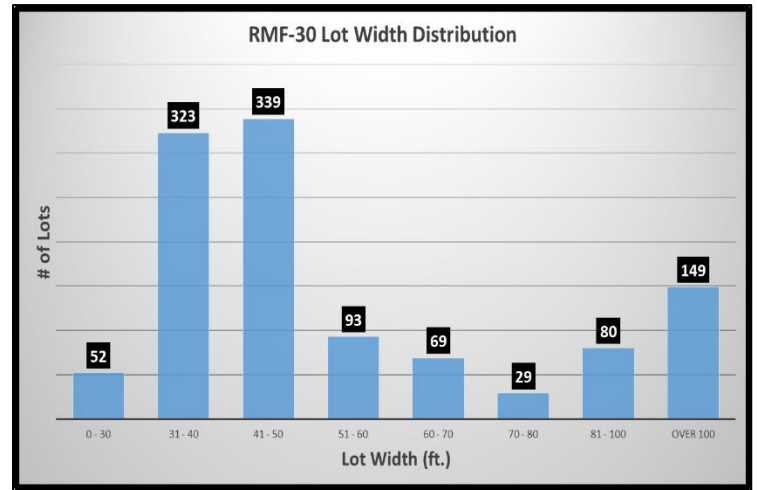
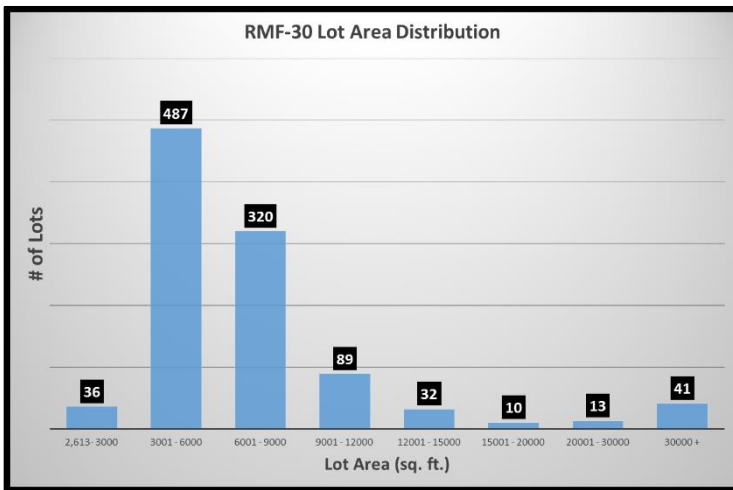
\*Larger maps of all of the RMF zoning districts and the RMF-30 lots located within a local historic district can be found in [Attachment B](#).

Lot Size

The average lot size in the RMF-30 zone is 6,114 square feet<sup>1</sup>; however, as illustrated by the distribution graph below, close to half of the lots (487 of 1,028) fall between 3,000 – 6,000 square feet in size. **By current standards, the average lot couldn't accommodate anything more than a single-family home**, which requires 5,000 square feet of lot area per unit. Three quarters of the lots (783) couldn't accommodate a duplex or twin-home, which requires 8,000 square feet of lot area per unit. There is no special process in place to request additional units on a lot if it does not meet these minimum area requirements.

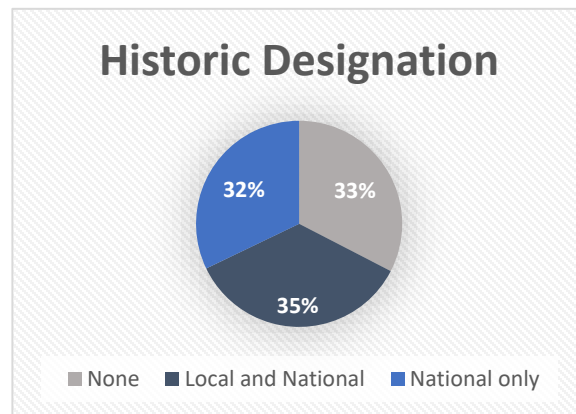
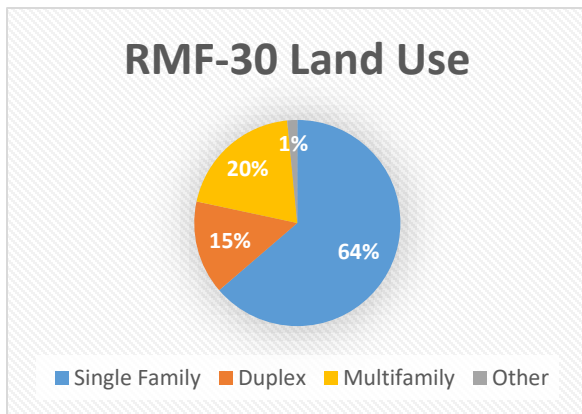
Lot Width

A similar pattern can be seen with existing lot *widths* in the city. The average lot width in the RMF-30 zone is 58 feet wide<sup>2</sup>; however, 662 or 65% of the lots fall between 31 and 50 feet wide – well under the 80-foot lot width requirement to accommodate a multi-family development or 3+ units without special approval. In fact, **more than half of the lots are under 50 feet wide, and do not have the width to accommodate a single-family home by current standards**. Required lot width can be modified through planned development approval.



To note – the total number of lot width measurements is greater than the total number of lots in the RMF-30 district as it accounts for the two sides on every corner lot.

Land Use



<sup>1</sup> 66 outlier parcels removed from average over 14,000 square feet in area

<sup>2</sup> 42 outlier parcels removed with widths less than 25 feet and greater than 250 feet

Looking at existing land use on the 1,028 parcels in the RMF-30 district, Salt Lake County tax assessor classifies: 565 as single-family homes, 130 as duplexes, 178 as multi-family buildings (3+ units), and 14 as a combination of residential uses and the rest vary in use (vacant, commercial, planned development, etc.). Of those 887 residential properties, 35% or 313 are located in a local historic district where the demolition of historic structures must be reviewed and approved by the City's Historic Landmark Commission.

**Missing Middle Housing.** With the proposed RMF-30 updates, the City hopes to encourage the development of “missing middle housing” in particular, which has been described as:

*“Range of **multi-unit or clustered housing types compatible in scale with single-family homes** that help meet the growing demand for walkable urban living. These types provide diverse housing options along a spectrum of affordability, including duplexes, fourplexes, and [cottage developments], to support walkable communities, locally-serving retail, and public transportation options. Missing Middle Housing provides a solution to the mismatch between the available U.S. housing stock and shifting demographics combined with the growing demand for walkability” (Congress for the New Urbanism).*



Diagram of Missing Middle Housing Types. **Source:** [Opticos Design, Inc.](#)

Missing middle housing is not a new type of housing. It’s housing that exists in Salt Lake City today: duplexes, triplexes, fourplex buildings, townhouses, small-scale apartment buildings, etc. However, more often than not, these housing types are difficult to build because they do not meeting current zoning standards, especially in areas where they’re best suited near the city’s downtown, universities and, of course, public transit. Below are some examples of existing missing middle housing types that “fit in” with their surroundings while providing higher unit counts. Note the number of units that exist on the lot, the number of units that are allowed per current RMF-30 standards.

[682-688 E. 700 South](#) – 16 units on 8,429 sq. ft. = 527 sq. ft. per unit  
Current Allowance – 2 units







661 S. Green St. – 10 units on 27,234 sq. ft. = 2,723 sq. ft. per unit  
 Current Allowance 9 units (separate structures on single lot also not permitted)



852 S. 800 East – 12 units on 17,424 sq. ft. = 1,452 sq. ft. per unit  
 Current Allowance 5 units (separate structures on single lot also not permitted)



620 S. Park St. – 12 units on 17,877 sq. ft. = 1,490 sq. ft. per unit  
 Current Allowance 5 units

## **Proposed RMF-30 Text Amendments.**

The following section of this report goes into more detail regarding each of the specific updates being proposed to the RMF-30 zoning standards. By updating these standards, the City hopes to remove some of the zoning barriers that limit new housing development, while encouraging compatible design and maintaining existing housing stock. With this in mind, Planning Staff is recommending implementing what could be described as “hybrid” form based standards.

Form based codes focus on the regulation of what buildings look like in terms of their compatibility with existing buildings in a neighborhood as well as their relationship with the street or what is referred to as the “public realm.” This differs from traditional zoning approaches, which emphasize the separation of land uses – single-family here, multi-family over there, on this amount of land, etc. With this hybrid approach, the proposed updates work to facilitate the development of slightly denser, “missing-middle” housing types that fit in with existing development patterns in the RMF-30 districts, while continuing to regulate required lot area per unit.

### **1. Design Standards – Promote compatible design with durable building materials.**

Design standards for new construction are intended to utilize planning and architecture principles to shape and promote a walkable environment in specific zoning districts, foster place making as a community and economic development tool, protect property values, assist in maintaining the established character of the city, and implementing the city's master plans. Design requirements are in place within many of the city's commercial and mixed-use zoning districts, but not in any of the RMF districts. Therefore, the following design requirements consistent with Chapter 21A.37: Design Standards of the Zoning Ordinance are proposed to be applied to the RMF-30 district:

- **Durable Building Materials** – Other than windows and doors, 50% of a new building's street facing façade shall be clad in durable materials including stone, brick, masonry, textured or patterned, and fiber cement board. Traditional stucco falls under masonry. Other durable materials may be approved at the discretion of the planning director.
- **Glass** – All new buildings shall have at least 20% of glass (windows, doors, etc.) on the ground floor street facing façade and 15% on the upper street facing façade.
- **Building Entrances** – At least one operable building entrance on the ground floor is required for every street facing façade, which includes corner façades.
- **Blank Wall Maximum** – The maximum length of any blank wall uninterrupted by windows, doors, art or architectural detailing at the ground level along any street facing facade is 15 feet.
- **Screening of Mechanical Equipment and Services Areas** – All mechanical equipment and service areas shall be screened from public view and sited to minimize their visibility and impact.
- **RMF Entry Features** – Along with required building entrances, each entrance shall have one of the following entry features including lighting and a walkway that connects to a public sidewalk:
  - a. **Covered Porch** – A covered, raised porch structure with or without railings spanning at least a third the length of the front building façade.
  - b. **Portico** – A structure with a roof protruding over the building entry supported by columns or enclosed by walls over a stoop or walkway.
  - c. **Awning or Canopy** – A hood or cover suspended above the building entry over a stoop or walkway where the wall(s) around the entry project out or recess in by at least one foot (1') from the front building plane.
  - d. **Emphasized Doorway** – A doorway that is recessed by at least one foot (1') from the front building plane and architecturally emphasized with a doorframe of a different material than the front façade, differentiated patterns or brickwork around the door, and/or sidelights. Doorways need not be recessed more than six inches (6”) on a tiny house.



**2. New Building Forms in RMF-30 – Encourage building forms and arrangements that are compatible with smaller-scale development with lower perceived density.**

In addition to single-family homes, duplexes, triplexes, apartment buildings, etc., the City would like to encourage three new specific housing types or forms in the RMF-30 zoning district that may allow for slightly higher unit counts, but are also compatible with existing development in the area. These three types include cottage developments, side oriented row houses and tiny houses that otherwise wouldn't be allowed in RMF districts without special approval.

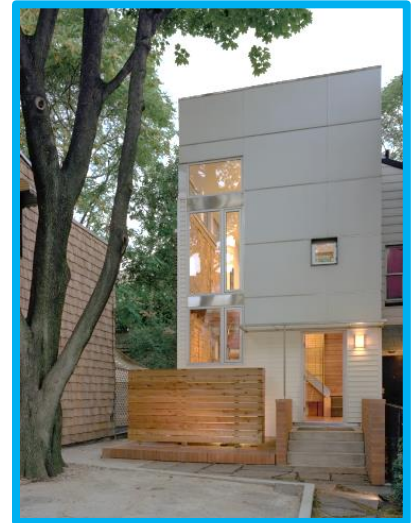
**Cottage Developments** are currently allowed in the city's existing Form Based districts and are defined as, "a unified development that contains two (2) or more detached dwelling units with each unit appearing to be a small single-family dwelling with a common green or open space. Dwellings may be located on separate lots or grouped on one lot." Cottage structures have relatively small footprints and are grouped in a communal fashion on a lot. The following design standards would be applied to these forms including limiting usable floor area to 850 square feet.

- i. Setbacks Between Cottages: All cottages shall have a minimum setback of eight feet (8') from another cottage.
- ii. Area: No cottage shall have more than eight hundred fifty (850) square feet of usable floor area.
- iii. Building Entrance: All building entrances shall face a public street or a common open space.
- iv. Open Space: A minimum of two hundred fifty (250) square feet of common, open space is required per cottage up to a maximum of one thousand (1,000) square feet. At least fifty percent (50%) of the open space shall be contiguous and include landscaping, walkways or other amenities intended to serve the residents of the development.

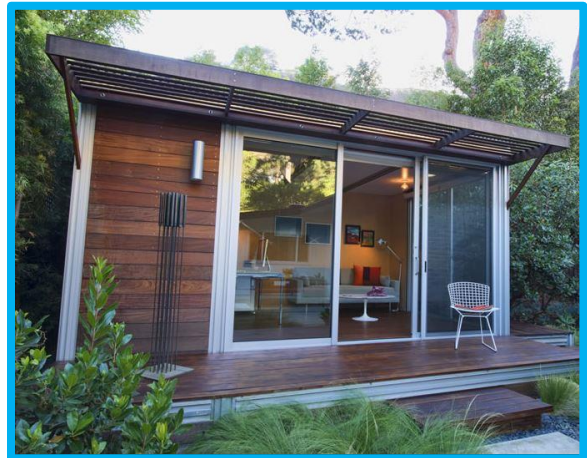


**Side Oriented Row Houses** where the entries of single-family attached units face the side of a lot as opposed to the street are difficult to build in any zoning district because code currently does not allow lots without public street frontage. With intentional design, side oriented row houses can make good use of the long narrow lots in the city while maintaining compatibility with lower-scale residential development. These forms are frequently reviewed by the Planning Commission and just as frequently approved provided that the front-most unit is completely oriented to the street and adequate buffers are maintained around the property. Therefore, it is being proposed that side oriented row houses be allowed by right, per the additional standards below. Keep in mind that these standards will be applied in conjunction with the proposed standards in Chapter 21A.37: Design Standards and a special exception will be required if each unit is on its own lot.

- i. Interior Setbacks: The interior side yard setbacks (S) shall be ten feet (10') on one side and six feet (6') on the other.
- ii. Front Building Entry: The unit adjacent to a street shall have its primary entrance on the façade of the building parallel to the street with an entry feature per section 21A.37 of this title.
- iii. Garage Doors: Garage doors are prohibited on the façade facing the front yard area.
- iv. Delineation: Each dwelling unit shall be delineated as an individual unit through the use of color, materials, articulation of building walls, articulation in building height, lighting, and/or other architectural elements.
- v. Required Glass: For all floors or levels above the ground floor, a minimum of twenty percent (20%) of all street facing facades must be glass. Interior building facades shall also have a minimum of fifteen (15%) ground floor glass and fifteen (15%) upper floor glass.



**Tiny Houses** are limited by building code to 400 square feet in area excluding lofted space. A tiny home differs from a detached Accessory Dwelling Unit (ADU) as they are more limited in size and would *not* have to be owner occupied or associated with a single-family home. These structures would also have a permanent foundation and could not be on wheels. Tiny houses can be built today, but are treated the same as a single-family home and require 5,000 square feet of land area to build. This amount of land is not necessary for a 400 square-foot structure. Therefore, standards are being proposed to allow these structures on smaller lots with reduced setbacks, building height, etc. To note, the public has expressed a lot of interest in building these types of structures, which is another reason why this form is being proposed.





**3. Reduced Lot Area Requirements – Allow multi-family housing on average size lots equipped to accommodate multi-family development (3+ units).**

In most residential zoning districts in the city, the Zoning Ordinance regulates the number of units per square footage of land area – otherwise known as density requirements. Currently, the RMF-30 zone permits one multi-family unit per every 3,000 square feet of land (must have at least 3 units to have a multi-family building or 9,000 square feet of land). **Considering that about half of existing lots in the RMF-30 zone fall between 3,000 and 6,000 square feet, these lots couldn’t accommodate anything more than a single-family home.** For additional perspective, the existing historic developments on pages 4 and 5 of this report have between 530 to 1,500 square feet of land per unit. The Central Community Master Plan’s future land use designation for these areas also calls for up to 20 units per acre or 2,178 square feet per unit.

It is clear that the existing lot area requirements do not promote multi-family housing, which is why this proposal includes reducing the lot area requirements to 2,500 square feet per unit for traditional multi-family units (apartment building and condo buildings) and to 1,500 square feet for row houses, cottage developments and tiny house or building forms that can accommodate more units while remaining compatible with lower density development. This proposal also tends to align with lot area requirements in other urban areas of the country, which generally range from 1,500 to 2,900 square feet per unit. Denver, for example, that utilizes a form based code, allows 10 units maximum on a minimum of 6,000 square feet in similar-type zoning districts. This equates to 600 square feet of lot area per unit. Staff acknowledges that this proposal for Salt Lake City’s RMF-30 zoning district is relatively moderate in comparison to Denver. Current and proposed lot area requirements have been listed below and a table with lot area requirements across the U.S. can be found in *Attachment B*.

LAND USE	CURRENT AREA REQUIREMENT	PROPOSED AREA REQUIRED
Single-Family	5,000	2,500
Two-Family	8,000	5,000
Multi-Family (Must have at least 3 units)	3,000 (9,000 for first 3)	2,500 (7,500 for first 3)
Single-Family Attached/Row House (Must have at least 3 units)	3,000 (9,000 for first 3)	1,500 (4,500 for first 3)
Cottage Development (New Form)	n/a	1,500
Tiny House (New Form)	n/a	1,500

With these changes to lot area, approximately 39% or 345 of the 887 residential RMF-30 properties would become eligible to add at least one more unit *in addition* to the existing units(s) on the property (excluding the addition of tiny houses). The eligibility maps in *Attachment B* highlight these eligible parcels in green. Keep in mind that other factors may limit whether or not additional units can be added on a lot including accommodating required setbacks, lot coverage, building and fire code regulations, etc. Additionally, smaller lot size requirements should also promote smaller and more affordable housing units. The City does acknowledge that smaller lot sizes may put additional development pressure on lots with single-family homes, which is why some mechanisms to limit demolition are being introduced as detailed in the changes below.

**4. Removal of Required Lot Width – Allow other building requirements to drive lot width and remove this zoning barrier to multi-family housing development.**

In addition to required lot *area*, Salt Lake City’s Zoning Ordinance also requires that lots be a certain *width* for different land uses. Currently, lots are required to be at least 80-100 feet wide in the City’s Multi-Family

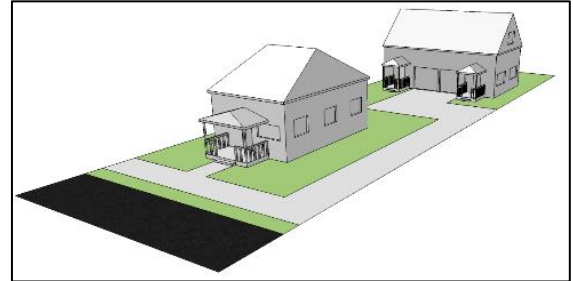


Residential (RMF) zoning districts to accommodate a new multi-family use (3 or more housing units). The City has found that these current requirements do not reflect the established lot width patterns in the RMF zoning districts as discussed in the *Closer Look at RMF-30* section of this report and can, ultimately, impede housing development. For example, the vacant lot pictured above could not be developed with more than three units as it does not have 80 feet of lot width even though it meets the minimum lot size requirements.

Many other standards are in place that encourage adequate lot widths and spacing between buildings including required side yard setbacks, driveway widths and building code standards. Therefore, per the proposed updates, minimum lot width requirements would be removed.

**5. More Than One Principal Structure On A Lot – Allow for historic development pattern to occur and encourage creative building arrangements.**

Constructing more than one principal structure on a lot is currently not permitted in RMF districts, *unless* both structures have public street frontage. The idea behind this is partly to discourage new buildings with poor access and little visibility for general safety purposes. However, Salt Lake City’s deeper lots tend to have a significant amount of underutilized land towards their rear and can have more than adequate access and visibility. Other zoning, building code, and fire regulations besides this limitation on multiple structures on a lot also work together to ensure adequate access and visibility. Constructing more than one building on a lot is characteristic of the historic development pattern and tends to encourage creative housing developments. Today, planned development approval is required for multiple structures on a lot. Therefore, provided that the additional structures meet all other zoning/city department standards, it is being proposed that more than one principal structure be permitted on all lots in the RMF-30 zoning district.



**6 & 7 – Mechanisms to Limit Demolition**

- **Unit Bonus for the Maintenance of Existing Structures – Incentivize the retention of existing structures and creative housing solutions.** In an effort to maintain existing and/or affordable housing stock in the RMF-30 zone – particularly historic or character-contributing buildings – while allowing for some new development, a unit bonus is being proposed to apply when housing is retained. Because the updates to lot area requirements may allow additional units to be added on a lot, this unit bonus will apply when a building permit is applied for to add an additional housing unit(s) to an existing structure – internal or external – that meets lot area requirements *and* the existing structure on the lot is retained. **The idea is that this unit bonus would encourage units to be added onto or within existing structures (single-family homes in particular) as opposed to demolishing the existing structure and rebuilding fewer units than what could be achieved with the bonus.** One bonus unit will be granted for the retention of a single-family home or duplex and two bonus units will be granted for the retention of multi-family buildings (3 or more units).
- **Lot Width Maximum – Discourage land banking and the demolition of existing structures.** In an effort to minimize collection of multiple parcels or “land banking” to accommodate large developments, a lot width maximum is proposed that would limit the widths of new lots to 110 feet wide or less. The maximum would be applied to the development as a whole as opposed to individual lots within a development. Based on average lots widths in the RMF-30 district, this would typically prevent the consolidation of more than two parcels, or three at the very most.

**KEY CONSIDERATIONS:** The following key considerations have been identified for the Planning Commission’s review and potential discussion.

## **#1. Compliance with Citywide Master Plans**

### **Growing SLC: A Five Year Housing Plan (2018-2022)**

The *Growing SLC* Housing Plan “*outlines...solutions...[for reaching a point] where all residents, current and prospective, regardless of race, age, economic status, or physical ability can find a place to call home. To achieve this goal, the City’s housing policy must address issues of affordability at the root cause, creating long-term solutions for increasing the housing supply, expanding housing opportunities throughout the city, addressing systemic failures in the rental market, and preserving our existing units*” (p. 9). The proposed text amendments directly support the following priorities identified in *Growing SLC*:

**Goal 1:** Reform City practices to promote a responsive, affordable, high-opportunity housing market.

- Objective 1: Review and modify land-use and zoning regulations to reflect the affordability needs of a growing, pioneering city.
  - 1.1.1 Develop flexible zoning tools and regulations, with a focus along significant transportation routes.

*“Land use decisions of the 1990s came about as a reaction to the gradual population decline that occurred over the preceding three decades. Conversely, the city’s population has grown by 20 percent in the last two decades, (the fastest rate of growth in nearly a century) presenting a need for a fundamentally different approach. Household type and makeup has also significantly changed to reflect smaller household sizes in the city.*

*Increasing flexibility around dimensional requirements and code definitions will reduce barriers to housing construction that are unnecessary for achieving city goals, such as neighborhood preservation. A concentrated zoning and land use review is warranted to address these critical issues and to refine code so that it focuses on form and scale of development rather than intended use” (p. 18).*

- 1.1.2 Develop in-fill ordinances that promote a diverse housing stock, increase housing options, create redevelopment opportunities, and allow additional units within existing structures, while minimizing neighborhood impacts.

*“In-fill ordinances provide both property owners and developers with options to increase the number of units on particular parcels throughout the city. Such options would also help restore the “missing middle” housing types where new construction has principally been limited to single-family homes and multi-story apartment buildings for decades. Missing middle housing types are those that current zoning practices have either dramatically reduced or eliminated altogether: accessory dwelling units, duplexes, tri-plexes, small multi-plexes, courtyard cottages and bungalows, row houses, and small apartment buildings. Finding a place for these housing types throughout the city means more housing options in Salt Lake City, and restoring choices for a wider variety of household sizes, from seniors to young families.*



*Apart from traditional infill ordinances, responding to the unusual age, form, and shape of housing stock should be addressed and leveraged to add incremental density in existing structures. This would include options for lot subdivision where there is ample space to build an additional home on a property or alternatively expand rental opportunities in existing structures” (p. 19).*

- Objective 2: Remove impediments in City processes to encourage housing development.

- 1.2.1 Create an expedited processing system to increase City access for those developers constructing new affordable units.

*“Providing developers who build affordable units with a fast-tracked permitting process will decrease the cost of those projects, increasing the likelihood that such projects make it to the market. The process will empower the administration with the authority to waive fees and expedite City procedures” (p. 21).*

- Objective 3. Lead in the construction of innovative housing solutions.

- 1.3.1 Lead in the development of new affordable housing types, as well as construction methods that incorporate innovative solutions to issues of form, function, and maintenance.

*“Additionally, the City will support the development of new or underutilized housing types that meet the unique needs of the diverse communities that live in Salt Lake City. This has already begun with projects that focus on a significant mix of resident incomes and micro-units and could be expanded to include other housing types. Efforts to develop well-designed and well-built homes that serve the changing needs of residents will improve housing choice into the future” (p. 22).*

### **Plan Salt Lake (2015):**

Plan Salt Lake identifies multiple ‘Guiding Principles,’ ‘Targets,’ and ‘Initiatives’ to help the city achieve its vision over the next 25 years. This project supports the following:

**Guiding Principle 1/Neighborhoods** that provide a safe environment, opportunity for social interaction, and services needed for the wellbeing of the community therein.

#### **Initiatives:**

**3. Create a safe and convenient place for people to carry out their daily lives.**

**5. Support policies that provides people a choice to stay in their home and neighborhood as they grow older and household demographics change.**

**7. Promote accessible neighborhood services and amenities, including parks, natural lands, and schools.**

**9. Support policies that provides people a choice to stay in their home and neighborhood as they grow older and household demographics change.**

**Guiding Principle 2/Growth:** Growing responsibly, while providing people with choices about where they live, how they live, and how they get around.

**Initiatives:**

- 1. Locate new development in areas with existing infrastructure and amenities, such as transit and transportation corridors.**
- 3. Promote infill and redevelopment of underutilized land.**
- 6. Accommodate and promote an increase in the City's population.**

**Guiding Principle 3/Housing:** Access to a wide variety of housing types for all income levels throughout the city, providing the basic human need for safety and responding to changing demographics.

**Initiatives:**

- 2. Increase the number of medium density housing types and options.**
- 3. Encourage housing options that accommodate aging in place.**
- 4. Direct new growth toward areas with existing infrastructure and services that have the potential to be people-oriented.**
- 5. Enable moderate density increases within existing neighborhoods where appropriate.**

**Salt Lake City Council's 20 Guiding Principles on Housing Development (2017)**

- Principal 6 – Create a net increase in affordable housing units while: i. Avoiding displacement of existing affordable housing to the extent possible, and ii. Retaining and expanding the diversity of AMI and innovative housing types.
- Principal 8 – Create a spectrum of housing options for people of all backgrounds and incomes.
- Principal 16 – Identify tools to increase and diversify the total housing supply including housing types that the private market does not sufficiently provide such as family housing in the downtown area, innovative housing types, missing middle housing and middle- to low-income apartments.

As documented above, the proposed text amendments are in line with goals and objectives outlined in the City's housing plan. Current lot area and width standards in place make it difficult to develop multi-family housing in the city's multi-family zoning districts – let alone multi-family development that's compatible with lower-scale neighborhoods. Yet, not only does the city need more housing in general, there is an increasing demand among millennials and baby boomers alike for smaller, accessible units of higher quality construction that are easier to maintain. The proposed text amendments aim not only remove restrictive zoning barriers to new housing development that the city needs, but to facilitate missing-middle type housing in walkable, desirable neighborhoods where RMF districts tend to be located.

**#2. Community Concerns** – The following concerns regarding the proposed text amendments were voiced by the community throughout the RMF-30 engagement process:

**Demolition of Existing Housing.** With any proposal that allows more housing density in an area, there tends to be concern that existing historic and/or affordable housing will be demolished to make way for larger more expensive housing developments. This is a legitimate concern that has been

raised by multiple community members throughout the engagement process. At the same time, multi-family zoning districts should allow multi-family development on an average site lot. Per current standards, close to half of the existing lots zoned RMF-30 are less than 6,000 square feet in area and couldn't accommodate anything more than a single dwelling unit. Close to three-quarters of the lots are less than 8,000 square feet in area and couldn't accommodate anything more than two units or a duplex. As we see with historic multi-family development already in place throughout the city, the average size lot in the RMF-30 district of 6,114 square feet can and should be able to accommodate more than a single-family home. With all of this in mind, a delicate balance needs to be struck between allowing more housing on adequately sized lots and promoting the preservation of existing structures, which is what this proposal aims to achieve.

First, close to a third of lots zoned RMF-30 are located in a local historic district where demolition of structures must be approved by the Historic Landmark Commission. Second, lot area requirements have been strategically reduced the most for single and two-family development (2,500 to 3,000 square-foot reduction), as well as compatible multi-family development including cottage developments, row houses and tiny houses (1,500 square foot reduction). Though compatible, row houses and cottage developments must meet many other design, building code and fire code regulations. Therefore, though the lot area requirements have been reduced the most for these forms, staff does not anticipate widespread demolition to accommodate these forms because they are more difficult to construct. Third, lot area has only been reduced by 500 square feet for multi-family building forms with three or more units. Not only does this promote the smaller building forms, but the proposed 2,500 square feet per unit also remains in line with the Central Community's Master Plan future land use designation for Low Medium Density Residential of 20 units per acre or 2,178 square feet of lot area per unit. Staff anticipates decreasing lot area requirements further for the RMF-35, -45, and -75 districts as these areas area meant to accommodate higher density.

Reducing lot area requirements also makes the proposed density bonus more functional. If an existing lot could accommodate one more unit with the proposed changes to lot area – which is the case of 299 lots zoned RMF-30 with single-family homes – the lot could then have two more units if the existing structure is preserved. This incentive aligns directly with the City's Housing Plan to "*lot subdivision where there is ample space to build an additional home on a property or alternatively expand rental opportunities in existing structures*" (p. 19). Finally, the proposed lot width maximum was born directly out of the need to limit land banking and subsequent demolition. Based on average lot width, this maximum would typically prevent more than three lots from being consolidated into one, and subsequently three existing units from being demolished.

**Affordable Housing Development.** Questions were often asked regarding how these text amendments work to promote affordable housing development throughout the engagement process. These amendments do not directly facilitate affordable units per the U.S. Department of Housing and Urban Development (HUD) standards<sup>3</sup>. However, by reducing required lot size per unit, units

<sup>3</sup> Housing Affordability - Is the level of homeowner or rental housing prices relative to the level of household income. Housing is considered affordable, when a household is paying no more than 30% of their total gross income towards housing expenses; rent or mortgage and utilities. The 30% of income standard is a widely used and accepted measure of the extent of housing affordability problems across the country. This standard applies to households of any income level.

Affordable Housing - Is government-subsidized housing for low-income households. A residential unit is generally considered affordable if the household pays 30% or less of their total gross income towards rent, for eligible households with low, very-low and extremely-low incomes, including low-wage working families, seniors on fixed incomes, veterans, people with disabilities



themselves might also be smaller and, in turn, more affordable. The three housing types that are being promoted with this amendment including cottage developments, row houses and tiny houses also tend to have smaller footprints. More than anything, these amendments are aimed at facilitating new multi-family housing in general. A greater supply of market rate housing may free up the number of affordable or mid-priced units for those who truly qualify for them. As the City's Housing Plan acknowledges, introducing flexible zoning regulations is merely a piece of the affordable housing puzzle and the Division of Housing and Neighborhood Development has many other programs in place that work to not only promote, but preserve affordable housing.

**Preservation of Allen Park.** Multiple concerns have been raised regarding the preservation of Allen Park, which is a large 5-acre parcel located across from Westminster College at approximately 1700 South and 1300 East and zoned RMF-30. While open space is certainly important to preserve, the park is private property that could currently be redeveloped with housing without the proposed text amendments. Per current standards, 72 multi-family units could be constructed on the 5-acre lot based on lot area requirements alone. Per proposed standards, 87 multi-family units could be constructed; though, if row house or cottage units were to be development this allowance would increase to 145 units at 1,500 square feet per unit. However, a large stream runs through the property that is protected by riparian corridor regulations, which do not permit principal structures within 50 feet on either side of the stream's waterline. Though more units could be built under the proposed text amendments, any future development would still be greatly limited due to these riparian regulations.

**Parking Requirements.** Concerns from community members regarding parking requirements go both ways – current requirements are either too much or not enough. The East Central Community Council in particular, where many RMF-30 parcels are located, voiced multiple concerns regarding the lack of street parking in their neighborhoods. Because of this, they do not believe new developments should receive parking reductions for completing transportation demand management strategies. Others, including the Historic Landmark Commission, expressed that if parking requirements are not reduced for multi-family housing, missing-middle-type housing might not be feasible as there's simply not enough space on a lot to accommodate multiple parking stalls and multiple housing units.

Parking will not be updated as a part of this zoning text amendment; however, the parking chapter is being updated at this time per a different text amendment. Staff will work together closely to see how parking can be best accommodate within the city's RMF districts.

**NEXT STEPS:**

Because staff does want to obtain feedback from both the Planning Commission and the public at this time, but also acknowledges that additional fine-tuning must be done to the proposed text amendments, it is recommended that the Planning Commission keep table petition PLNPCM2019-00313 regarding updates to the RMF-30 Low Density Multi-Family Residential Zoning District and make a positive or negative recommendation to City Council at a later date once the proposed text amendments have been finalized.

and those experiencing homeless. There are different kinds of affordable units, including public housing, voucher-subsidized units, or income restricted units.

**ATTACHMENT A: PROPOSED TEXT AMENDMENTS**

## Proposed Changes to the RMF-30 Low Density Multi-Family Residential Ordinance (21A.24.120)

Strike and Underline Draft – 6/26/2019

### 21A.24.120: RMF-30 LOW DENSITY MULTI-FAMILY RESIDENTIAL DISTRICT:

- A. Purpose Statement: The purpose of the RMF-30 Low Density Multi-Family Residential District is to provide an environment suitable for a variety of housing types of a low density nature, including single-family, two-family, and multi-family dwellings, with a maximum height of thirty feet (30'). ~~This district is appropriate in areas where the applicable Master Plan policies recommend multi-family housing with a density of less than fifteen (15) up to twenty (20) dwelling units per acre.~~ Uses are intended to be compatible with the existing scale and intensity of the neighborhood. The standards for the district are intended to provide for safe and comfortable places to live and play, promote sustainable and compatible development patterns and to preserve the existing character of the neighborhood.
- B. Uses: Uses in the RMF-30 Low Density Multi-Family Residential District, as specified in section [21A.33.020](#), "Table Of Permitted And Conditional Uses For Residential Districts", of this title, are permitted subject to the general provisions set forth in section [21A.24.010](#) of this chapter and this section.
- C. Multiple Buildings on a Single Parcel: More than one principal building may be located on a single parcel, and are allowed without having public street frontage, provided that all other zoning requirements are met; and,
1. Design Standards: All new buildings are subject to applicable design standards in chapter 21A.37 of this title. For buildings not located along a street, the standards applicable to street facing facades shall be applied to the face where the primary entrance is located.
- D. Lot Width Maximum: No newly created lot shall have a lot width greater than one hundred ten feet (110'). This maximum shall be applied to the development as a whole as opposed to the individual lots within the development.
- E. Density Bonus: To encourage the preservation of neighborhood character, bonus dwelling units may be granted when an existing principal structure is retained as part of a project that adds at least one additional dwelling unit on the lot pursuant to the following:
1. One (1) bonus unit may be granted for retaining an existing single or two-family structure and two (2) bonus units for retaining an existing multi-family structure.
  2. Dwelling units may be added internally to the existing structure or detached from the structure as a separate building form.
  3. The addition of a bonus unit to the existing principal structure does not change the building form of that existing structure.
  4. Bonus dwelling units are not subject to minimum lot area requirements, but must comply with all other underlying lot and bulk regulations when located outside of an existing structure.
  5. Bonus units shall be exempt from accommodating off-street parking.
  6. Exterior building walls of the existing principal structure shall be retained; however, rear additions are allowed. Non-structural modifications, such as modification to windows, doorways, the addition of dormers, and the addition of other architectural design elements to the structure are also allowed.



C. Minimum Lot Area And Lot Width: The minimum lot areas and lot widths required in this district are as follows:

<b>Land Use</b>	<b>Minimum Lot Area</b>	<b>Minimum Lot Width</b>
Multi-family dwellings	9,000 square feet <sup>1</sup>	80 feet
Municipal service uses, including City utility uses and police and fire stations	No minimum	No minimum
Natural open space and conservation areas, public and private	No minimum	No minimum
Places of worship less than 4 acres in size	12,000 square feet	140 feet
Public pedestrian pathways, trails and greenways	No minimum	No minimum
Public/private utility transmission wires, lines, pipes and poles	No minimum	No minimum
Single-family attached dwellings (3 or more)	3,000 square feet per unit	Interior: 25 feet Corner: 35 feet
Single-family detached dwellings	5,000 square feet	50 feet
Twin home dwelling	4,000 square feet per unit	25 feet
Two-family dwellings	8,000 square feet	50 feet
Utility substations and buildings	5,000 square feet	50 feet
Other permitted or conditional uses as listed in section <a href="#">21A.33.020</a> of this title	5,000 square feet	50 feet

Qualifying provisions:

1.9,000 square foot minimum for 3 dwelling units plus 3,000 square feet for each additional dwelling unit.

## F. RMF-30 Building Types and Forms

1. **Single-Family Dwelling:** A detached residential structure that contains one (1) dwelling unit. The structure has an entry facing the street, a front porch or stoop, and a small front yard.
  
2. **Two-Family Dwelling:** A residential structure that contains two (2) dwelling units in a single building. The units may be arranged side by side, up and down, or front and back. Each unit has its own separate entry directly to the outside. Dwellings may be located on separate lots or grouped on one lot.
  
3. **Cottage Development:** A unified development that contains two (2) or more detached dwelling units with each unit appearing to be a small single-family dwelling with a common green or open space. Dwellings may be located on separate lots or grouped on one lot.
  - a. Additional Development Standards for Cottage Building Forms
    - i. Setbacks Between Individual Cottages: All cottages shall have a minimum setback of eight feet (8') from another cottage.
    - ii. Area: No cottage shall have more than eight hundred fifty (850) square feet of usable floor area, excluding basement area.
    - iii. Building Entrance: All building entrances shall face a public street or a common open space.
    - iv. Open Space: A minimum of two hundred fifty (250) square feet of common, open space is required per cottage up to a maximum of one thousand (1,000) square feet. At least fifty percent (50%) of the open space shall be contiguous and include landscaping, walkways or other amenities intended to serve the residents of the development.
  - b. Cottage Development Units on Individual Lots:
    - i. Required setbacks shall be applied to the perimeter of the cottage development as opposed to each individual lot within the development. The front and corner yards of the perimeter shall be maintained as landscaped yards.
    - ii. Lot coverage shall be calculated for the cottage development as a whole, as opposed to each individual lot within the development.
    - iii. Required off street parking for a unit within the cottage development is permitted on any lot within the development.
    - iv. A cottage development where each cottage is on its own lot shall require final subdivision plat approval. The final plat must document the following:
      1. The new lot(s) has adequate access to a public street by way of easements or a shared driveway.

2. A disclosure of private infrastructure costs for any common area associated with the new lot(s) per section 21A.55.110 of this title is submitted with the Preliminary Subdivision Plat.

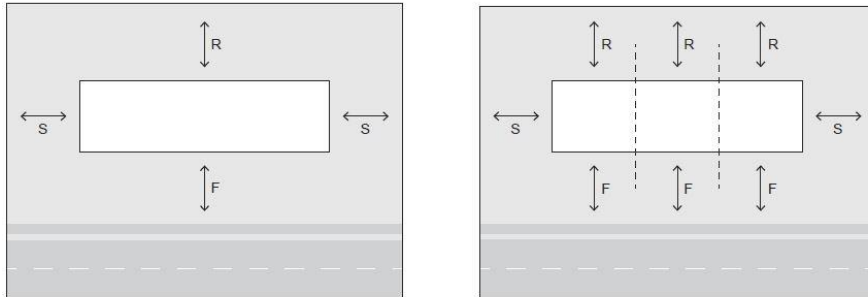
4. **Row House:** A series of attached single-family dwellings that share at least one common wall with an adjacent dwelling unit. A row house contains a minimum of three (3) residential dwelling units. Each unit may be on its own lot. If possible, off street parking is accessed from an alley.

Side Oriented Row House:

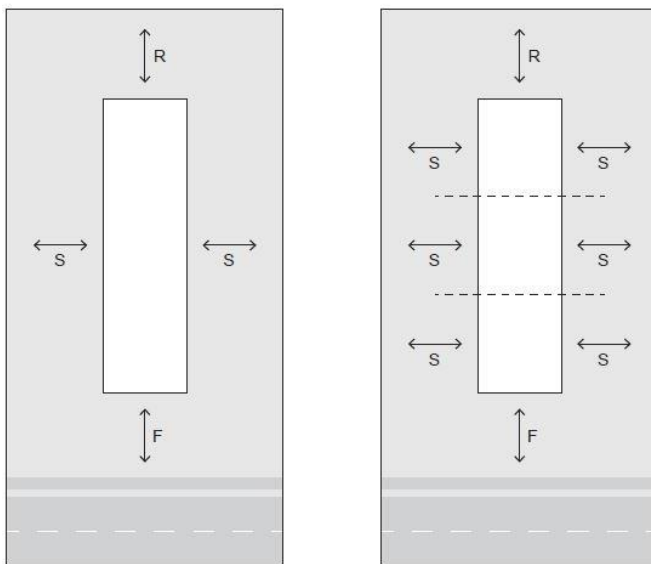
- a. Additional Development Standards for Row House Building Forms with Entrances Oriented Towards the Side of a Lot.
  - i. Interior Setbacks: The interior side yard setbacks (S) shall be ten feet (10') on one side and six feet (6') on the other.
  - ii. Front Building Entry: The unit adjacent to a street shall have its primary entrance on the façade of the building parallel to the street with an entry feature per section 21A.37 of this title.
  - iii. Garage Doors: Garage doors are prohibited on the façade facing the front yard area.
  - iv. Delineation: Each dwelling unit shall be delineated as an individual unit through the use of color, materials, articulation of building walls, articulation in building height, lighting, and/or other architectural elements.
  - v. Required Glass: For all floors or levels above the ground floor, a minimum of twenty percent (20%) of all street facing facades must be glass. Interior building facades shall also have a minimum of fifteen (15%) ground floor glass and fifteen (15%) upper floor glass.
- b. Side Oriented Row House Units on Individual Lots:
  - i. Required setbacks shall be applied to the perimeter of the row house development as opposed to each individual lot within the development. The front and corner yards of the perimeter shall be maintained as landscaped yards.
  - ii. Lot coverage shall be calculated for the row house development as a whole, as opposed to each individual lot within the development.
  - iii. Required off street parking for a unit within the row house development is permitted on any lot within the development.
  - iv. A row house development where each unit is on its own lot shall require final subdivision plat approval. The final plat must document the following:
    1. The new lot(s) has adequate access to a public street by way of easements or a shared driveway.

2. A disclosure of private infrastructure costs for any common area associated with the new lot(s) per section 21A.55.110 of this title is submitted with the Preliminary Subdivision Plat.

**Required Setbacks for Street (Normal) Oriented Row House**



**Required Setbacks for Side Oriented Row House**



5. **Multi-Family Residential:** A multi-family residential structure containing three (3) or more dwelling units that may be arranged in a number of configurations.
6. **Tiny House:** A detached residential structure that contains one (1) dwelling unit with a permanent foundation that is 400 square feet or less in usable floor area excluding lofted space. The structure has a single entry facing the street, an alley or open space on a lot, but shall not face an interior property line.
  - a. Additional Development Standards for Tiny House Forms:



- i. Balconies and Decks: Balconies and decks shall not exceed eighty (80) square feet in size when located above the ground level of the buildings and shall be located a minimum of ten feet (10') from a side or rear yard lot line unless the applicable side or rear yard lot line is adjacent to an alley.
- ii. Rooftop Decks: Rooftop decks on tiny houses are prohibited.
- iii. Parking: A tiny house shall require one (1) off street parking space per unit.

**7. Non Residential Building:** A building that houses a non-residential use either permitted or permitted as a conditional use in the underlying zoning district.

~~D. Maximum Building Height: The maximum building height permitted in this district is thirty feet (30').~~

~~E. Minimum Yard Requirements:~~

~~1. Front Yard: Twenty feet (20').~~

~~2. Corner Side Yard: Ten feet (10').~~

~~3. Interior Side Yard:~~

~~a. Single family detached and two family dwellings:~~

~~(1) Interior lots: Four feet (4') on one side and ten feet (10') on the other.~~

~~(2) Corner lots: Four feet (4').~~

~~b. Single family attached: No yard is required, however if one is provided it shall not be less than four feet (4').~~

~~c. Twin home dwelling: No yard is required along one side lot line. A ten foot (10') yard is required on the other.~~

~~d. Multi family dwelling: Ten feet (10') on each side.~~

~~e. All other permitted and conditional uses: Ten feet (10') on each side.~~

~~4. Rear Yard: Twenty five percent (25%) of the lot depth, but not less than twenty feet (20') and need not exceed twenty five feet (25').~~

~~5. Accessory Buildings And Structures In Yards: Accessory buildings and structures may be located in a required yard subject to section [21A.36.020](#), table [21A.36.020B](#), "Obstructions In Required Yards", of this title.~~

~~F. Required Landscape Yards: The front and corner side yards shall be maintained as landscape yards.~~

~~G. Maximum Building Coverage:~~

- ~~1. Single Family Detached: The surface coverage of all principal and accessory buildings shall not exceed forty five percent (45%) of the lot area.~~
- ~~2. Single Family Attached Dwellings: The surface coverage of all principal and accessory buildings shall not exceed fifty percent (50%) of the lot area.~~
- ~~3. Two Family And Twin Home Dwellings: The surface coverage of all principal and accessory buildings shall not exceed fifty percent (50%) of the lot area.~~
- ~~4. Multi-Family Dwellings: The surface coverage of all principal and accessory buildings shall not exceed forty percent (40%) of the lot area.~~
- ~~5. Existing Dwellings: For dwellings existing on April 12, 1995, the coverage of such existing buildings shall be considered legally conforming.~~
- ~~6. Nonresidential Land Uses: The surface coverage of all principal and accessory buildings shall not exceed fifty percent (50%) of the lot area.~~

~~H. Landscape Buffers: For multiple-family uses where a lot abuts a lot in a single-family or two-family residential district, a landscape buffer shall be provided in accordance with chapter 21A.48 of this title.~~

G. Building Form Standards: Building form standards are listed in table 21A.24.120.H of this section.

Table 21A.24.120.H

RMF-30 Building Form Standards

Building Regulation		Building Form						
		Single-Family Dwelling	Two-Family Dwelling	Multi-Family Residential	Row House <sup>1</sup>	Cottage Development <sup>1</sup>	Tiny House <sup>1</sup>	Non Residential Building
Building height and placement:								
H	Height	30'				17'	30'	
F	Front yard setback	20'						
C	Corner side yard setback	10'						
S	Interior side yard setback	4' on one side 10' on the other		10'	4'		10'	
R	Rear yard	Minimum of 20% lot depth up to 25'			10'		Minimum of 20% lot depth up to 25'	
L	Minimum lot size	2,500 sq. ft.			1,500 sq. ft.		5,000 sq. ft.	
BC	Maximum Building Coverage	50%						
LY	Required Landscaped Yards	The front and corner side yards shall be maintained as landscape yards.						
LB	Landscape Buffers per subsection 21A.48.080C of this title.		X	X			X	

G	Attached Garages	Garage doors accessed from the front or corner side yard shall be no wider than 50% of the front facade of the structure and set back at least 5' from the street facing building facade and at least 20' from the property line. Side loaded garages are permitted.
DS	Design Standards	All new buildings are subject to applicable design standards in chapter 21A.37 of this title.

Notes:

1. See subsection 21A.24.120F of this title for additional standards

I. Accessory Buildings And Structures In Yards: Accessory buildings and structures may be located in a required yard subject to section 21A.36.020, table 21A.36.020B, "Obstructions In Required Yards", of this title.

(Ord. 66-13, 2013: Ord. 12-11, 2011: Ord. 62-09 §§ 5, 8, 2009: Ord. 61-09 § 6, 2009: Ord. 88-95 § 1 (Exh. A), 1995: Ord. 26-95 § 2(12-11), 1995)

## **Chapter 21A.37 DESIGN STANDARDS**

### **21A.37.050: DESIGN STANDARDS DEFINED:**

The design standards in this chapter are defined as follows. Each design standard includes a specific definition of the standard and may include a graphic that is intended to help further explain the standard, however the definition supersedes any conflict between it and a graphic.

P. Entry Features in the RMF Districts: At least one operable building entrance with one or more permitted entry features and a walkway connected to a public sidewalk is required on every street facing façade. Where an entry does not face a street, All entry features shall also include exterior lighting to highlight the entrance. Row house and cottage development building forms shall have at least one entrance with an entry feature on each unit.

1. Encroachments: A permitted entry feature may encroach up to five feet (5') into a required yard.

2. Permitted Entry Features:

a. Covered Porch – A covered, raised porch structure with or without railings spanning at least a third the length of the front building façade.

b. Portico – A structure with a roof protruding over the building entry supported by columns or enclosed by walls over a stoop or walkway.

c. Awning or Canopy – A hood or cover suspended above the building entry over a stoop or walkway where the wall(s) around the entry project out or recess in by at least one foot (1') from the front building plane.



d. Emphasized Doorway – A doorway that is recessed by at least one foot (1') from the front building plane and architecturally emphasized with a doorframe of a different material than the front façade, differentiated patterns or brickwork around the door, and/or sidelights. Doorways need not be recessed more than six inches (6") on a tiny house.

**21A.37.060: DESIGN STANDARDS REQUIRED IN EACH ZONING DISTRICT:**

This section identifies each design standard and to which zoning districts the standard applies. If a box is checked, that standard is required. If a box is not checked, it is not required. If a specific dimension or detail of a design standard differs among zoning districts or differs from the definition, it will be indicated within the box. In cases when a dimension in this table conflicts with a dimension in the definition, the dimensions listed in the table supersede those in the definition.

TABLE 21A.37.060

A. Residential districts:

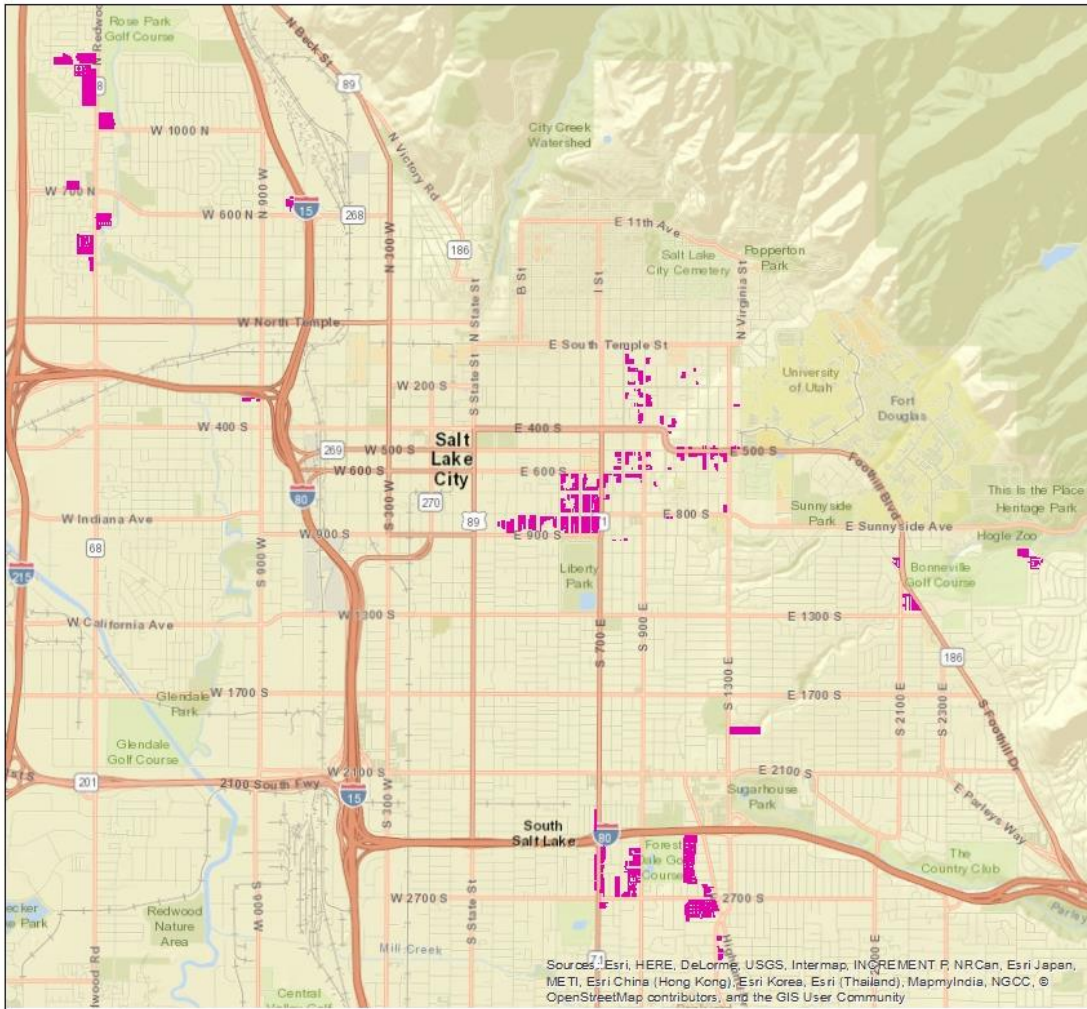
Standard (Code Section)	District								
	RMF-30	RMF-35	RMF-45	RMF-75	RB	R-MU-35	R-MU-45	R-MU	RO
Ground floor use (%) ( <a href="#">21A.37.050A1</a> )						75	75		
Ground floor use + visual interest (%) ( <a href="#">21A.37.050A2</a> )									
Building materials: ground floor (%) ( <a href="#">21A.37.050B1</a> )	<u>50</u>					80	80		
Building materials: upper floors (%) ( <a href="#">21A.37.050B2</a> )	<u>50</u>								
Glass: ground floor (%) ( <a href="#">21A.37.050C1</a> )	<u>20</u>					60	60	40	

Standard (Code Section)	District								
	RMF-30	RMF-35	RMF-45	RMF-75	RB	R-MU-35	R-MU-45	R-MU	RO
Glass: upper floors (%) ( <a href="#">21A.37.050C2</a> )	<u>15</u>								
Building entrances (feet) ( <a href="#">21A.37.050D</a> )	<u>X</u>					75	75	X	
Blank wall: maximum length (feet) ( <a href="#">21A.37.050E</a> )	<u>15</u>					15	15	15	
Street facing facade: maximum length (feet) ( <a href="#">21A.37.050F</a> )									
Upper floor step back (feet) ( <a href="#">21A.37.050G</a> )							10		
Lighting: exterior ( <a href="#">21A.37.050H</a> )									
Lighting: parking lot ( <a href="#">21A.37.050I</a> )					X			X	
Screening of mechanical equipment ( <a href="#">21A.37.050J</a> )	<u>X</u>					X	X	X	
Screening of service areas ( <a href="#">21A.37.050K</a> )	<u>X</u>					X	X	X	
Ground floor residential entrances ( <a href="#">21A.37.050L</a> )									
Parking garages or structures ( <a href="#">21A.37.050M</a> )									

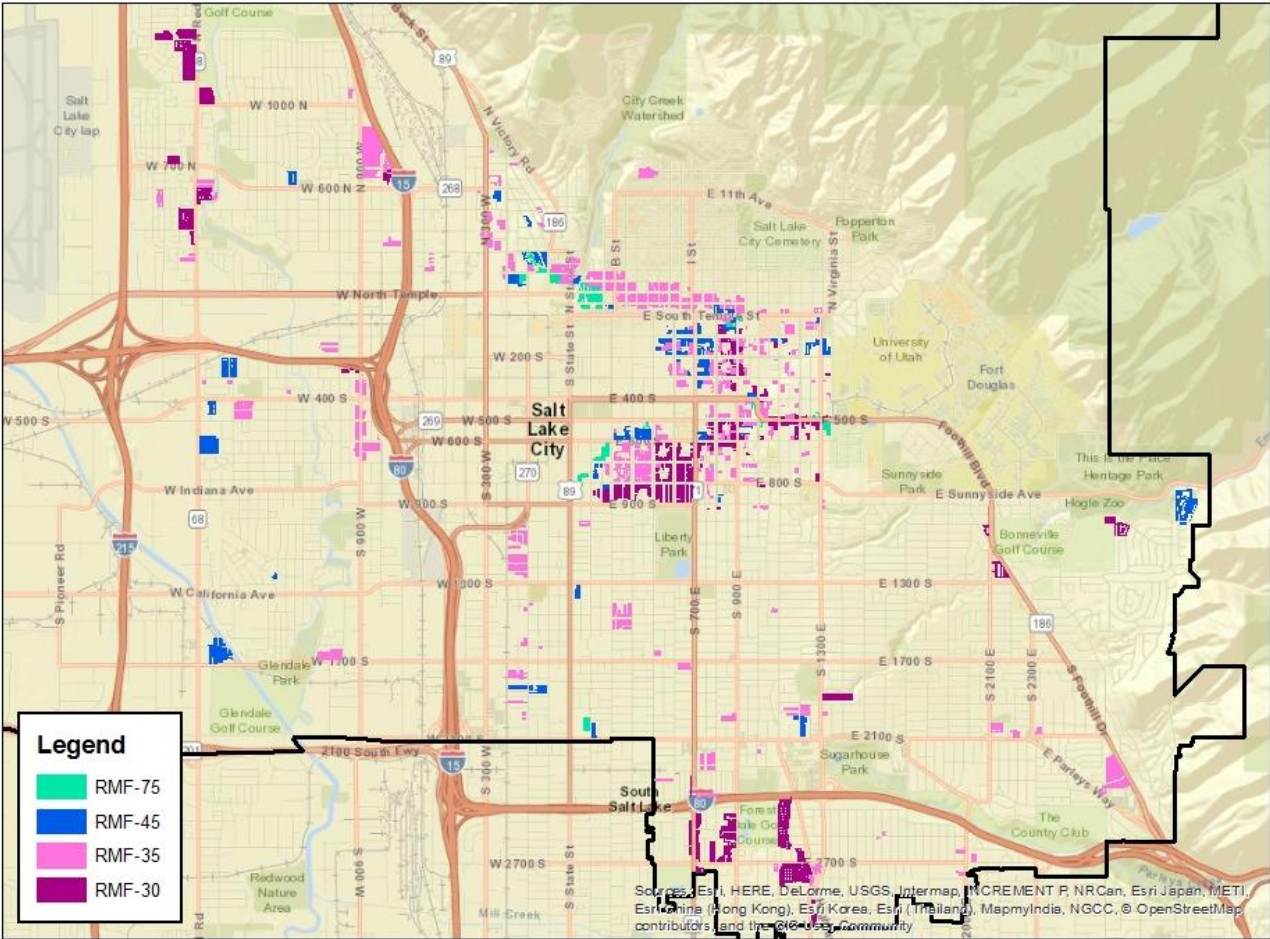
Standard (Code Section)	District								
	RMF-30	RMF-35	RMF-45	RMF-75	RB	R-MU-35	R-MU-45	R-MU	RO
Residential character in RB District <a href="#">(21A.37.050N)</a>					X				
<u>Entry Features in the RMF Districts</u> <a href="#">(21A.37.050P)</a>	X								

# ATTACHMENT B: INFORMATIONAL MAPS

## 1. RMF-30 Zoning Districts

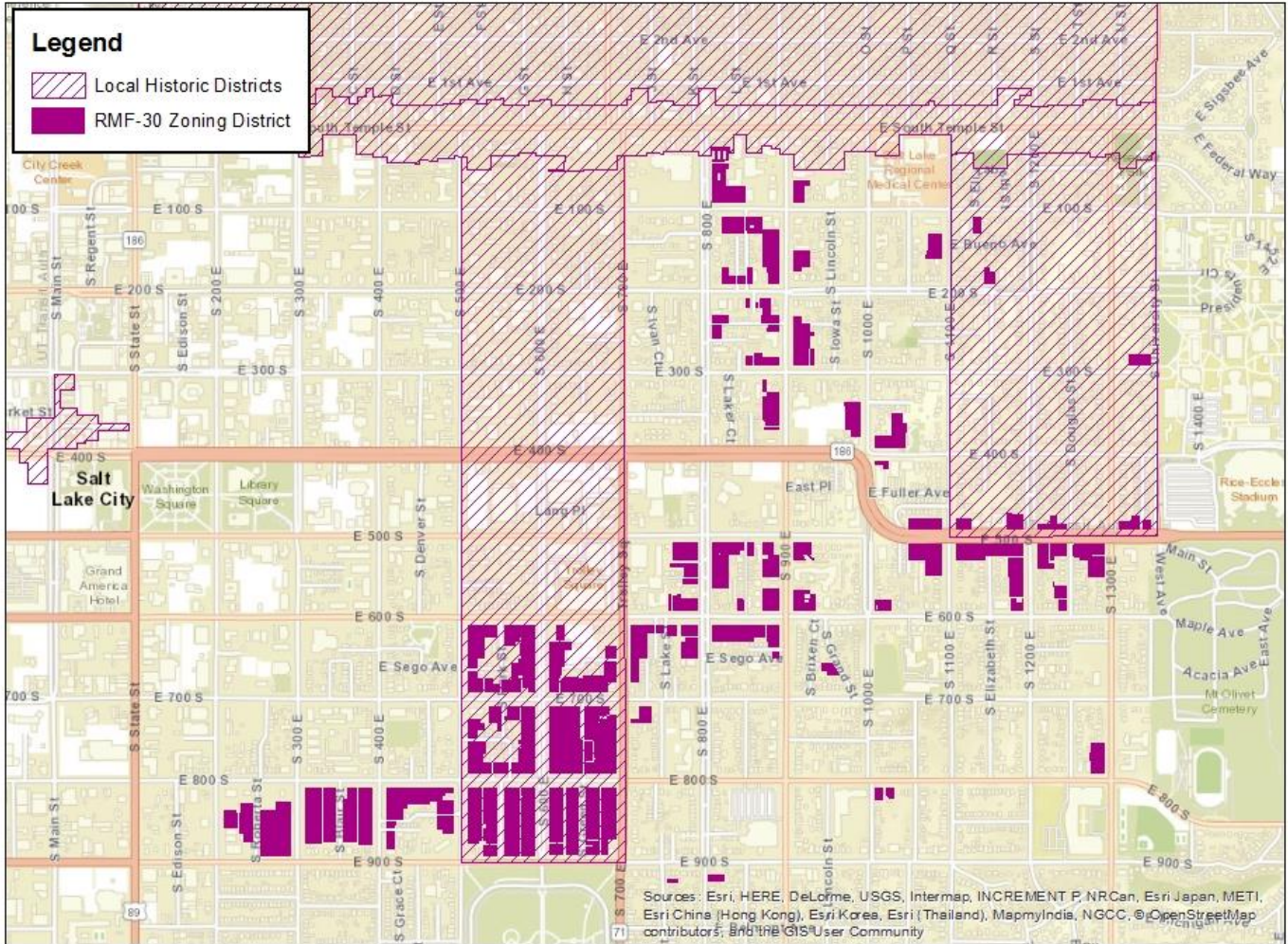


## 2. All Multi-Family Residential (RMF) Zoning Districts





### 3. RMF-30 Zones in Local Historic Districts

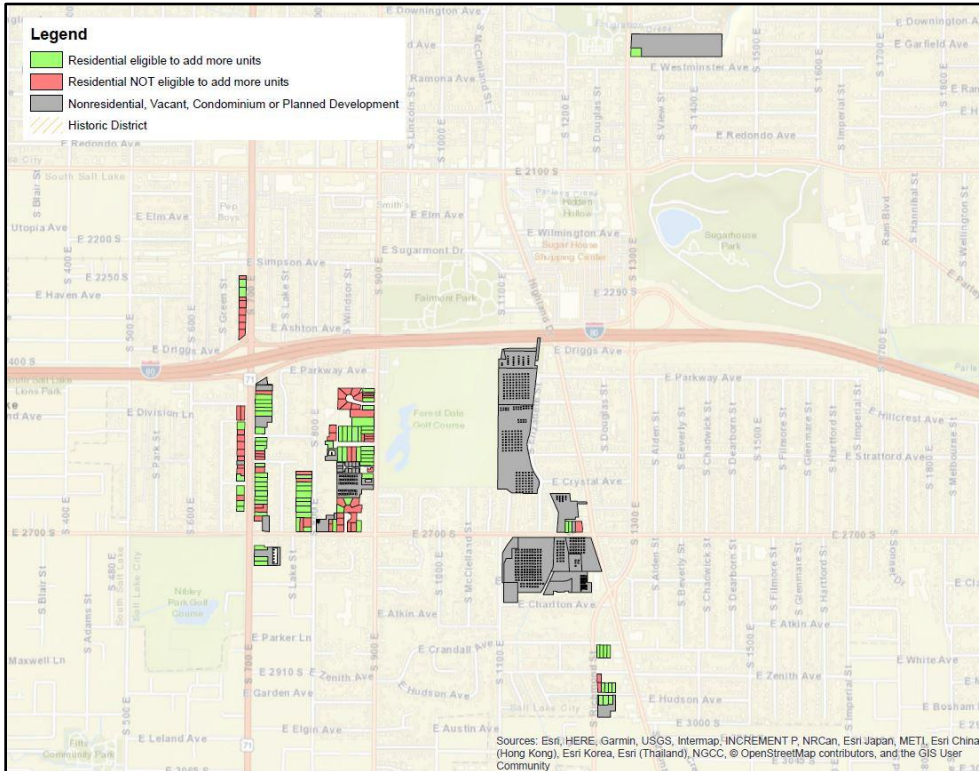
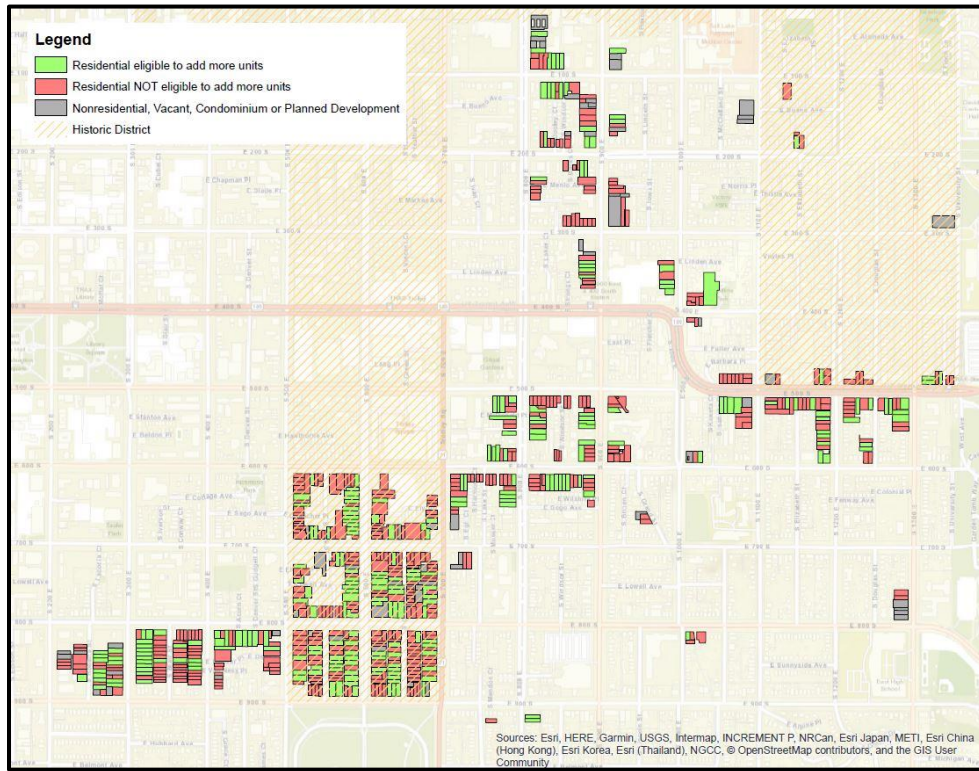


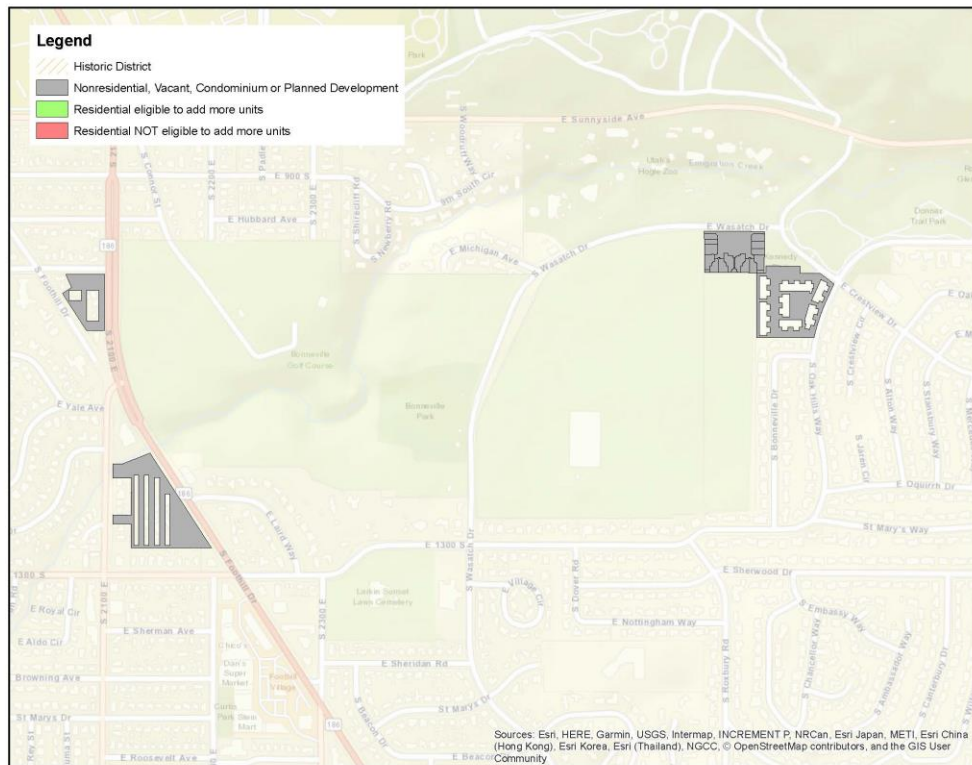
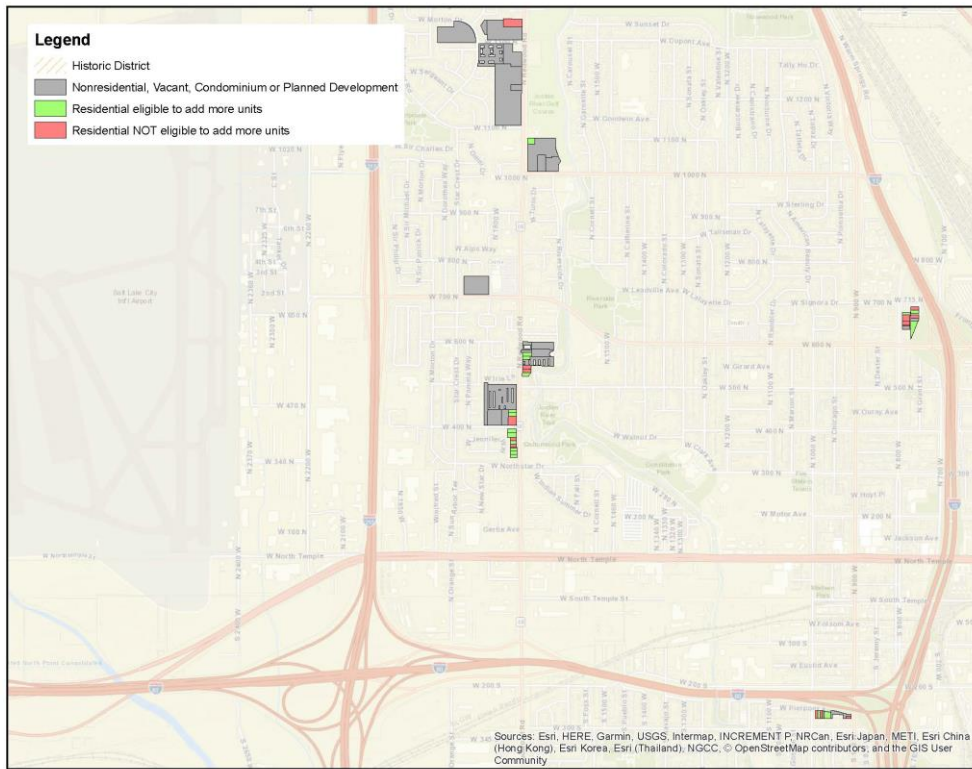
#### 4. Building Morphology in RMF-30 Areas





## 5. Unit Eligibility Maps





## 6. Multi-Family Zoning Requirements Across the U.S.

CITY	POPULATION	MULTI-FAMILY ZONING DISTRICT	DENSITY (sq. ft. per unit or dwelling unit/acre)	LOT WIDTH	HEIGHT	LOT COVERAGE	FLOOR AREA RATIO (FAR)
San Antonio, TX	1.5 million	MF-18 (Limited Density)	18 du/acre	50	35	-	-
		MF-25 (Low Density)	25 du/acre	50	35	-	-
San Diego, CA	1.4 million	RM-1-1/2/3 (Lower Density)	3,000/2,500/2,000	50	30	-	0.75/0.9/1.05
		RM-2-4/5/6 (Medium Density)	1,750/1,500/1,250	50	40	-	1.2/1.35/1.5
Austin, TX	950,000	MF-1 (Limited Density)	17 du/acre	50	40	45%	-
		MF-2 (Low Density)	23 du/acre	50	40	50%	-
Jacksonville, FL	892,000	RMD-B/C/D (Medium Density)	4,400/2,900/2,100	60	45	50%	-
Columbus, OH	879,000	R-4	2,500	50	35	-	-
Fort Worth, TX	874,000	CR (Low Density)	16 du/acre	-	36	40%	-
		C (Medium Density)	24 du/acre	-	36	55%	-
Seattle, WA	725,000	LR1/2/3 (Lowrise)	2,200-no min (based on use)	-	40-18 (by use /location)	-	0.9-2.0 (based on use and location)
Denver, CO	705,000	E-RH-2.5 (Urban Edge Rowhouse)	max 10 du / min lot 6,000	50	30	37.50%	-
		E-MU-2.5 (Urban Edge)	-	50	30	37.50%	-
		U-RH-2.5 (Urban Rowhouse)	max 10 du / min lot 6,000	50	35	-	-
		G-RH-3 (General Urban Rowhouse)	-	50	30	-	-
		G-MU-3 (General Urban)	-	50	40	-	-
Washington, DC	694,000	RA-1 (Apartment Low to Moderate)	-	-	40	40%	0.9
Boston, MA	685,000	H-1-40 (Apartment)	1,500	-	40	-	1.0
El Paso, TX	684,000	A-1/2 (Apartment)	2,400/1,750	60/50	35	50%	-
Nashville, TN	668,000	R15/20	15/20 du/acre (1,800/1,500 RH)	40	20/30 (3 stories RH)	-	IRS 0.7
Portland, OR	648,000	R2/3 (Low Density)	14.5 (21 w/ bonus)/21.8 (32 w/ bonus)	-	35/40	45%/50%	-
Oklahoma City, OK	644,000	R-3M (Medium Multi-Family)	2,200	100	35	-	-
Louisville, KY	621,000	R-5A/6	12.01/17.42	35	45	-	0.5/0.75
Milwaukee, WI	595,000	RM1/2/3	2,400/1,200	40 (25 RH)/30 (18 RH)	45	50%	-
Albuquerque, NM	558,000	R-2	30 du/acre	60	26	-	0.5
Tucson, AR	536,000	R-2/3	15/36 du/acre	-	25/40	75%/70%	-
Fresno, CA	527,000	RM-1	12-16 du/acre	-	40	50%	-
Sacramento, CA	502,000	R-2A/2B/3	17/27/30 du/acre	20	35	50%	-
Mesa, AZ	496,000	RM-2/3/4	15/20/30 du/acre	36	30/40	45%/50%	-
Kansas City, MO	489,000	R-2.5/1.5	2,500/1,500	40/30	40/45	-	-
Omaha, NE	467,000	R-WRN (Walkable Residential)	2,500	50	35	-	-
		R-6 (Low-Density)	2,000	50	45	50%	0.5



## **ATTACHMENT C: 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.

Factor	Finding	Rationale
<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><b>Complies</b></p>	<p>As outlined above in the ‘Key Considerations’ section, the proposed text amendments support multiple principles and initiatives of Plan Salt Lake (2015).</p> <p>In addition, these amendments were born from the immediate need to implement the recently-adopted <i>Growing SLC</i> housing plan.</p> <p>Staff finds that the proposed text amendments 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>	<p><b>Complies</b></p>	<p>The proposed text amendments advance the purpose and intent of the Zoning Ordinance, specifically the following:</p> <p><i>..to promote the health, safety, morals, convenience, order, prosperity and welfare of the present and future inhabitants of Salt Lake City, to implement the adopted plans of the city...</i></p> <p><i>This title is, in addition, intended to:</i></p> <p><i>C. Provide adequate light and air;</i></p> <p><i>D. Classify land uses and distribute land development and utilization;</i></p> <p><i>G. Foster the city’s industrial, business and residential development.</i></p> <p>The proposed amendments further the purpose and intent of the Zoning Ordinance by</p>

		allowing/fostering well-designed multi-family residential building forms on adequately sized lots in the city.
<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>	<b>Complies</b>	The proposed zoning standards are in line with development principals within the local historic overlay, especially in terms of compatible development. Mechanisms are also being proposed to limit demolition of existing structures outside of the local historic overlays.
<b>4. The extent to which a proposed text amendment implements best current, professional practices of urban planning and design.</b>	<b>Complies</b>	<p>The proposed text amendments directly support the <i>Growing SLC</i> housing plan, which is a forward-thinking document when it comes to addressing affordable housing for all residents, now and into the future as the City continues to grow.</p> <p>The amendments propose to use elements of a form based code, which has proven success in fostering well-designed, pedestrian-friendly communities across the nation.</p> <p>Additionally, the American Planning Association (APA) recently published a Housing Policy Guide on June 4, 2019. The APA advocates for public policies that create just, healthy, and prosperous communities that expand opportunity for all through good planning and their advocacy is based on adopted positions and principles contained in policy guides. Position 1 within the Housing Policy Guide aligns directly with the proposed text amendments as follows:</p>

***POSITION 1 – Modernize state and local laws to ensure housing opportunities are available, accessible, and affordable to all.***

***Position 1B – The American Planning Association and its Chapters and Divisions support the modernization of local zoning bylaws and ordinances to increase housing production, while taking local context and conditions into account. While challenging to confront and, ultimately, amend or dismantle exclusionary zoning, rules, and practices, planners must take the lead in modernizing zoning. Local jurisdictions should adopt bylaws or ordinances, policies, and incentives that facilitate a range of housing types and densities and that serve a diversity of housing needs. Local jurisdictions should review and modernize bylaws and ordinances and planners need resources to make updates happen and to ensure***

**adequate public engagement occurs. Updates to bylaws and ordinances should address mixed use and multifamily development, including affordability. Updates should also include rezoning for higher densities where there may be existing lower densities. Local jurisdictions should consider reducing or eliminating minimum lot size requirements, reducing minimum dwelling unit requirements, allowing greater height and density and reducing or eliminating off-street minimum parking requirements, and they should specifically identify and eliminate or minimize regulatory obstacles to the establishment of accessory dwelling units, whether attached to or detached from the principal dwelling unit. Local jurisdictions should also allow for and encourage adaptive reuse and use conversions to encourage housing production. Local jurisdictions should also research and analyze, and as part of any zoning amendment, preempt all restrictive covenants and barriers to fair housing and access to housing choice, including barriers to on-street, overnight parking.**

*Location should be addressed without compromising equity or resiliency. Local jurisdictions should consider incorporating into bylaws and ordinances transit-oriented development principles and principles that address the importance of housing location in relation to access and proximity to schools, jobs, parks, transportation, and other critical amenities and resources. States should consider moving to a Housing + Transportation Index when determining affordability.*

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

### **Notice to Community/Neighborhood Councils:**

Recognized community-based organizations that contain land zoned RMF-30 were notified of the proposed text amendments via email on February 13, 2019. Upon their request, the changes were presented at the Sugar House Land Use Committee's March 18<sup>th</sup> meeting, the East Central Community Council's March 21<sup>st</sup> meeting and the Central City Community Council's April 3<sup>rd</sup> meeting. No other councils requested a presentation. Formal comments received from the council chairs have been attached.

### **Open House:**

All recognized community-based organizations were also notified of the proposed text amendments via Open House notices sent on February 14<sup>th</sup>, 2019. Because these zoning text amendments impact the different areas of the city and not one specific Community or Neighborhood Council, an Open House was held on February 26<sup>th</sup>, 2019 at the Salt Lake City's downtown public library. All written comments received have been attached.

**Focus Group:** A focus group with local professionals who have worked in RMF-30 areas previously was held on April 2, 2019. Many felt that the proposed design standards would drive up the cost of units as things like durable building materials and glass drive up the cost of construction. In general, the more requirements and processes the higher the cost of their units – costs get transferred to the buyer or renter. They also suggested clarifying some of the design standards. At times they can be vague and it's unclear if a certain design or material would qualify.

In terms of the proposed unit bonus, some were enthusiastic about working with existing structures while others only work with new construction. The restoration of existing units can also be expensive and drive up costs. It is, however, more profitable to build/restore smaller units. Most were on board with all of the new proposed building forms, especially tiny homes. Parking and fire regulations are two things that could stop this kind of infill development. They suggested reduced parking requirements for preserving a unit and reduced parking in general.

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

- Agenda posted on the Planning Division and Utah Public Meeting Notice websites on June 14<sup>th</sup>, 2019.
- Newspaper notice ran on June 15<sup>th</sup>, 2019.

### **Public Input:**

Throughout the engagement process, there has been general public input both in favor and against the proposed text amendments. Community concerns that were heard the most have been described under the Key Considerations section of this report. Formal comments submitted by community members have been included as a part of this attachment below.

### **Commission Briefings:**

The following points and recommendations were made during briefings with the Planning Commission and Historic Landmark Commission where they were asked for their direct feedback on the proposed changes.

#### *PC Briefing – December 12, 2018*

- Second-floor balconies may not an appropriate design requirement in low density residential zoning districts like RMF-30

- Requiring certain building forms and design standards may counteract the a goal of facilitating affordable housing – may be too restrictive
- The 20% glass requirements on front facades may be too high
- Cottage units may be limited further in size
- General interest in allowing tiny house building forms on smaller size lots
- Should somehow mitigate the impact of long interior walls of side oriented row houses – interior walls are also very visible from the public way
- Not confident in allowing side oriented row houses per more design guidelines and administrative review alone because design is objective and these forms may need a closer level Commission review
- Re-review minimum lot width requirements
- Re-review standards for creating lots without public streets frontage
- Access easements for lots without public street frontage should be recorded on the plat
- Suggested looking into decreasing lot area requirements for multi-family uses
- Suggested having different standards for lots abutting single-family zoning districts
- rezone certain areas to be more or less dense
- Over time, Central City might all be up-zoned
- Other zoning standards could be relaxed when buildings are preserved – amount of vegetation in the park strip could be relaxed

*HLC Briefing – May 2, 2019*

- Two parking spaces per unit is too high for cottage developments
- Parking can drive an entire development – on the cusp of radical change in terms of living preferences and parking
- May utilize a shared parking arrangement in between buildings on a site
- EIFS isn't always a bad material – can be getting into the minutia by regulating EIFS
- Stucco, Hardie plank, Hardie lap and any cementitious siding can work well
- Existing building envelopes, especially in terms of scale and form, should be maintained
- Side oriented row houses can have a negative impact on adjacent neighbors
- New driveways too close to property lines can have negative impact on historic homes
- Side oriented row houses should have smaller side yard setbacks than 10' and 10'
- Generally in favor of tiny house forms
- Unit bonus shouldn't create an explosion of housing as some might think



March 25, 2019

TO: Salt Lake City Planning Commission

FROM: Judi Short, Land Use Chair, Sugar House Community Council

RE: RMF 30 Zoning Update



We have reviewed this proposal at our LUZ meeting on March 18, and I also sent it out to the trustees on our council who live in affected neighborhoods. I got a few comments back. One said, "Judi, I've been talking to folks and attended the open house tonight. I'm not sure this is a huge deal for people in my neighborhood. Many of the people I spoke to seem to be okay with it. I'll keep trying to get a feel for the neighbors' sentiment. Thanks." The other told me that she had talked to a number of the people in the area who seemed to feel like these were welcome changes. She was referring to the areas along 700 East on both sides, and 900 East on the West side.

The committee members discussed through the month the 700 East and 900 East locations. We seemed to feel that these were mostly large and deep lots that could stand to be renovated. The parcels that have been already upgraded were welcomed. We don't like the "shipping container" look, and feel that more care can be taken to design something attractive. Even though these are heavily trafficked streets, that doesn't give a builder license to build the cheapest project and charge the highest price the market will bear.

There are other areas in Sugar House where we did not feel any changes would be coming for many years. They were the Graystone Condos, built in 1960, and the condos all along Elizabeth Street built in 1971, as well as the Forest Glen Condos along the freeway, built in about 1978. I have been in a number of those units, and walked through these developments. Each unit is owner occupied, and very well maintained. Even though these are older buildings, no one seemed to feel like they were at risk of being redeveloped in the next 20 years. And, if we look at the layout of these, they are very close together, three stories. The only thing that might be worrisome is this ordinance would allow buildings closer together. That might eliminate some of the green space. These have very formidable condominium associations, and I think that would be difficult to change. No one could imagine taking one of the buildings down and building something different.

The last parcel I want to bring your attention to is **Allen Park**, located across from Westminster College along 1300 East. This is an 8 acre parcel, built in the 1930's by Dr. George Allen, who collected birds, and later donated them to form what is now Tracy Aviary. And, it has a big riparian corridor right through the middle of it, which identifies a big, no-build zone. The existing buildings are historic, but certainly not up to code. A few are probably worth saving and restoring, especially the log home. This parcel needs to be removed from consideration. By definition, you can't leave space for the riparian corridor and still cram in a ton of new housing at the density this projected code change would encourage. This needs some thoughtful historic preservation, to maintain the ambiance (without rats and peacocks), and with careful design, could add a number of very large, high-end homes that could be a real asset to the city, and Sugar House. Figure out a way to remove **Allen Park** from this plan. The litigation over this parcel could go on for years, but it needs to be protected now.

# OPEN HOUSE PUBLIC COMMENT FORM

February 26, 2019



Planning Division  
Department of Community and  
Neighborhoods

## RMF-30 Text Amendment

Name: Jennifer de Tapia

Address: \_\_\_\_\_  
\_\_\_\_\_

SU

Phone: \_\_\_\_\_ E-mail \_\_\_\_\_

Comments: I ~~am~~ would like the City to consider special/different treatment for tiny houses. These are affordable and ~~are~~ environmentally friendly. If tiny houses are treated the same as single-family, developers will always seek to maximize square footage in the name of profit. Tiny houses can provide young and small families with diverse, <sup>and affordable</sup> housing options.

Please provide your contact information so we can notify you of other meetings or hearings on this issue. You may submit this sheet before the end of the Open House, or you can provide your comments via e-mail at [lauren.parisi@slcgov.com](mailto:lauren.parisi@slcgov.com) or via mail at the following address: Lauren Parisi, Salt Lake City Planning Division, PO Box 145480, Salt Lake City, UT 84114-5480.

**OPEN HOUSE  
PUBLIC COMMENT FORM**

**February 26, 2019**



Planning Division  
Department of Community and  
Neighborhoods

**RMF-30 Text Amendment**

Name:

JERRY MARASCO

Address:

\_\_\_\_\_

\_\_\_\_\_

Phone:

\_\_\_\_\_ E-mail: \_\_\_\_\_

Comments:

1. Require ?% affordable if 6+ units but create incentive path - eg, must take advantage of incentive for approval
2. Create pilot project whereby developer does not provide on site parking BUT tenants/owners must not have a vehicle!

Please provide your contact information so we can notify you of other meetings or hearings on this issue. You may submit this sheet before the end of the Open House, or you can provide your comments via e-mail at [lauren.parisi@slcgov.com](mailto:lauren.parisi@slcgov.com) or via mail at the following address: Lauren Parisi, Salt Lake City Planning Division, PO Box 145480, Salt Lake City, UT 84114-5480.

**OPEN HOUSE  
PUBLIC COMMENT FORM**

**February 26, 2019**



Planning Division  
Department of Community and  
Neighborhoods

**RMF-30 Text Amendment**

**Name:** Sarah Isaacson (Central City Community Council)  
CCNCUtah.org

**Address:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Zip Code \_\_\_\_\_ E-  
mail f

**Phone:** Will some of the units (for sale, like cottages) be

**Comments:** \_\_\_\_\_  
controlled by an HOA? How much will be  
"affordable" - No more than 30% mortgage/Rent  
of the average/median 43K Salary?  
Increased supply of homes may help keep rents down,  
do we anticipate a leveling of the skyrocketing  
rental housing prices in the area? If so, how will this  
occur? thanks!

Please provide your contact information so we can notify you of other meetings or hearings on this issue. You may submit this sheet before the end of the Open House, or you can provide your comments via e-mail at [lauren.parisi@slcgov.com](mailto:lauren.parisi@slcgov.com) or via mail at the following address: Lauren Parisi, Salt Lake City Planning Division, PO Box 145480, Salt Lake City, UT 84114-5480.



# OPEN HOUSE PUBLIC COMMENT FORM

February 26, 2019



Planning Division  
Department of Community and  
Neighborhoods

## RMF-30 Text Amendment

Name: Eghe Subter

Address: 606 Grady Sq

Zip Code \_\_\_\_\_

Phone: \_\_\_\_\_

Comments: \_\_\_\_\_

① It would be helpful to look at specific parcels, include new design/regulations + most important all building code regs applied to see practical applications in a dozen or so lots.

② Balconies may or may not be appropriate depending on the neighborhood/block face.

③ Design elements that tie into existing neighborhoods could make each parcel more compatible. Examples could be small porches, etc.

Please provide your contact information so we can notify you of other meetings or hearings on this issue. You may submit this sheet before the end of the Open House, or you can provide your comments via e-mail at [lauren.parisi@slcgov.com](mailto:lauren.parisi@slcgov.com) or via mail at the following address: Lauren Parisi, Salt Lake City Planning Division, PO Box 145480, Salt Lake City, UT 84114-5480.

Flurs would be dependent on the block. So either tie in / not distract / or possibly very modern could bring fresh update. Totally dependent on each neighborhood.

④ Concerned that exceptions if made are



limited so they do not destroy neighborhood fabric or key features that are core/unique to each neighborhood are destroyed

Example / parking exceptions that cut into wide parkstrips core/unique to East Central.

- 5 concerned w fire protection /
- 6 landscape / trees always (real trees not lollipop trees) Protecting old growth trees
- 7 Incentivise good design & benefits  
Not just bike racks!

No balcony requirement!

Might not match block faces  
added costs = higher rents

Require  
Boards  
to be

2% Affordable  
with ~~an~~ incentives  
in the requirement

Maximum lot  
size

and

Maximum lot  
width

Averaging  
in neighborhood?

**Ian Kaplan via email – 2/14/2019**

I had time over the break to review the proposed changes to the RMF zone and have some feedback for you from the architecture/development side. I will be present at the public hearings to voice these matters, but thought it could be of potential use as the document changes prior to public comment.

1. Parking Reductions for Bonus Units/Row-houses. There is no mention of this - but in order to actually accomplish the density you're looking for in the tight lots there needs to be a 1 Stall/Unit regardless of bed count. Many historic examples of cottage style development don't have parking at all and it's the only way they work on tight lots. The proximity to transit helps, but anything outside of transit will be undevelopable.
2. Parking Reductions for preserving existing structures. It's often very difficult to provide additional parking for increased density if preserving the existing structure is a priority. This is where most infill projects hit a road block. Especially if they do not have an Alleyway for access.
3. Tandem Parking Regulations. For lots with access to an alley (and without) - tandem parking can be a great way to increase density and provide additional parking for 2+ bedroom units. It gives the designer a lot more flexibility in site layout.
4. Side Yard Setbacks for Rowhouses. More than half of the RMF-30 lots are between 31-50' wide. With a required side yard setback of 10' for rowhouses, that leave's 30' width for a building. However, take into account a 24' backup for a car coming out of a garage and add that to the 10' setback, and now you only have room for a 16' deep garage stall. That makes more than half of these lots un-developable for the rowhouse. I would suggest a wedding cake setback above 1st story leaving 3' req'd setbacks on the ground floor and 5-8' above that. It would provide opportunity for more diversified building designs instead of a second story cantilever over the garage.
5. Rear yard Setbacks for Cottage Style. The historic cottage style developments typically had two units at the back of the property with front doors turned and oriented to the street. With a 20' setback, you are essentially losing the potential for 2 units in the rear of the property. I believe it would be easier to achieve the desired density of these lots if the rear yard setback was reduced to 10' for cottage style developments.
6. Building Coverage. 50% is very limiting, and will create major difficulty in achieving the desired density on a majority of these lots. Can you eliminate private garages counting towards lot coverage? Is there a way to offset the max. building coverage by subtracting private balconies, or rooftop patio's from the lot coverage? Or can there be an exception for lots that maintain the existing structure in place?
7. Administrative review of existing non-conforming structures when adding density. Not sure how this is covered... but it is a concern of mine when trying to maintain existing structures on a property that may be non-conforming to new setback regulations.
8. Minimum Lot widths - Could there be an exception to the 50' req'd min. lot width for existing parcels? Per Planning Commission review or something... This is becoming a huge barrier to me

for infill development. I currently have two projects that are exactly 49.5' wide and it is bringing both of them to a grinding halt.

**Lynn K. Pershing via email – 2/27/2019**

I wasn't able to attend the open house on RMF-30 zoning changes last night. I want to express my **deep concern** about the RMF-30 zoning change in historic neighborhoods, which include Local historic districts in our City.

I do NOT support the proposed zoning changes in historic neighborhoods, both LHD, CCD and those listed on the National Register Of Historic Places.

Obtaining Approval of an LHD is a tortuous, extended process. The main purpose of obtaining an LHD is the City's promise to minimize demolitions of contributing structures and in those areas.

Now The City wants to approve SFD demolitions in historic districts? This will be viewed as City hypocrisy. Trust in government will be further eroded and will be deserved. LHD and Character Conservation Districts zoning are in grave danger. They should be considered sacrosanct.

My recent review of demolitions of SFD housing in our City in 2018 shows that the vast majority of demolitions have occurred in 84102 (Bryant (6) and Bennion-Douglas)8)) and 84108 portion Yalecrest (8), both neighborhoods listed on the National Register Of Historic Places. I acknowledge, much to my dismay, that these areas have NO City nor state protections against demolitions-an oversight of great proportions that will end the existence of the very SOUL of our City.

Allowing RMF-30-like zoning in historic areas has occurred before that you and others creating this zoning change are likely probably too young to have witnessed. In the 1960-70s, historically contributing, architectural significant SFD were demolished to create non compatible apt buildings in the lower Avenues that destroyed the historic environs, neighborhood identity and cohesion. Real estate prices in that area have not recovered to date. The current proposed zoning changes requested will support HISTORY REPEATING ITSELF in our remaining historic districts

I strongly urge you to reconsider this zoning change in historic neighborhoods. The claim of "compatible structures" is not viable, as the City has NO definition of "compatibility" in any ordinance (previous discussion with Planning, CAN, Mayor Office). Further, ONLY LHD and CCD have design guidelines concerning "compatibility".

I conclude, therefore, that the claims of ensuring "compatibility" misrepresents and offers false intent of achieving or enforcing any "compatibility" in future developments.

Please. Stop the destruction of the SOUL of this City. Historic neighborhoods tell the stories and celebrate the greatness of our City and State. Housing for a diverse City requires a diversity of housing options. SFD in desirable historic areas offer choices to many families who wish to locate into the urban environs in safe, desirable neighborhoods with good public schools.

Short term gains to fulfill "affordable housing" needs with long term permanent losses to the City constitutes a grave irreversible loss to our very identity and viable family housing.

**Kirk Huffaker (Executive Director, Preservation Utah) – March 30, 2019**

While I provided some comments to you and other staff at the open house, I wanted to follow that up with a brief message that particularly identifies Allen Park in Sugar House's Westminster Heights neighborhood as a sensitive site that should be removed from consideration of rezoning.

Allen Park is a site of unique and remarkable historic, architectural, and artistic significance that is located along a designated riparian corridor. I believe the site was zoned RMF-30 prior to the designation of the riparian corridor, and was not appropriately considered at that time for rezoning that would allow the riparian protections to take precedence. I believe this is the opportunity for the Planning Commission to correct this conflict.

Thank you for your consideration.

**Esther Hunter via email (East Central City Chair) – April 2, 2019**

Thank you for coming out to the meeting. This community is pretty versed in land use and in between the varied comments I hope you saw the key points we were trying to make.

1. The ECC has zoning on many lots that is incorrect and should have been dealt with years and years ago that has nothing to do with the changes you are making to the specific zones. This is not your issue nor can we fix the past. However, this may cause significant damage to some of this area. This has nothing to do with the changes you are making within the specific zone and everything to do with the zone on various properties. This is not a new issue. We have been saying this for years and attempted to make corrections caused by our long ago council person since this could have all been addressed seamlessly years ago.

Since so many people are new to various commissions and staff we tend to repeat ourselves in every letter we write and every statement we make. Speaking of, would you please let me know the names of the two folks who came with you and their positions? I appreciated how you took the feedback and basically said we will take this feedback back. This is the most helpful response.

2. The ECC is not opposed to development. We welcome all types of infill and redevelopment but do feel it needs to be thoughtfully placed so that we do not lose the very precious organically grown community that has developed. It is a jewel in its charm, types of residential options available that allow aging in place as well as proximity to so many beneficial features from senior services, schools, transit to shopping to employment. It is a rarity not only in this city/state but across the county. This is why the bad zoning is so frustrating in that the zoning should be protecting the right things and informing the development community where they should focus.

3. The point that Jen made related to affordable housing is a key one. While this is not your key focus, we are hoping you can help carry the message. I know this is beyond the immediate challenge you have been given and the effort the Planning Division will be doing based on the recommendations from the housing plan for all the RMF zones. Most people are repeating the words missing middle. In the ECC we are concerned about the missing middle but also very concerned about workforce housing and affordable housing. In our area it is the workforce housing and affordable housing that tends to be targeted by development. The replacements we have seen shift to market rate housing displacing a great many in our community. It is heart wrenching to look into the eyes of community members who

have lived in our area for 25-30 years, now much more senior, dependent on the services and the transportation offered in our area that have been literally been given 30 days or less to vacate and now can not find any housing options in the area.

Many in the audience last night in their day jobs are expert professionals in their field. Taylor that spoke up related to the ability to build in the new zone so that it can be either affordable or workforce housing is not probable is such an expert. This is true certainly not for a family vs simply a boarding house or small studio more likely for a student population. My suggestion on this front is that maybe a small working group that could give feedback much like you are assembling the development/architectural folks like Ian could provide some feedback that could help.

4. It's all a delicate balance. Way beyond the scope of what you are working on is the viability of the city financially which is a very complicated issue that includes dependence on building permit fees. It would be well if that state as a whole would do better to allow support for the extra wear and tear on everything from our infrastructure to services as our city doubles in size everyday but barring that while the city survives day to day we need to make sure we don't erode the wrong things, key areas of neighborhood being part of that concern.

**Yda Smith via email – April 19, 2019**

I am a resident in Sugar House and am hoping to be involved in the future of Allen Park it terms of advocating for the preservation of the open space, the trees, some of the historic features of the space and even the peacocks, if possible. I know that there are legal issues in terms of who the current owner is but in the meantime there are several of us in the area who are getting organized to see if we can start to move forward with possible options for preserving the beauty of the place and not let it turn into a dreadful housing development with the loss of all the trees, birds, peace and quiet, etc. For example, if the Aviary and/or Preservation Utah were involved in creating a public space it would greatly enhance the quality of life in the area with walking space among the trees and along the stream, space for bicycle riders, and information about the history of the Allen family, and possible exotic birds to enjoy that extend the tradition of the family. The land has a significant legacy with the history of Dr. Allen and the contributions he made to this area including to the Aviary and the Zoo.

I can understand the desire to change zoning in the areas on the map for possible rezoning of RMF-30 to create more affordable, smaller unit housing. I can see that Allen Park is marked as one of these areas as well. I would like to state my opinion that Allen Park should not be a part of this process and should be exempt from any changes that would increase the options for building new homes at this time. If there are any meetings associated with this I would like to know about them and attend.

Thank you for your time and I look forward to getting more involved in the future plans for this city and to get my neighbors more involved as well.



## **ATTACHMENT E: CITY DEPARTMENT COMMENTS**

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The following comments were received from other City divisions/departments with regard to the proposed text amendments:

### **Housing and Neighborhood Development (HAND):**

Housing Plan:

Thank you for citing the Housing Plan (you listed the plans dates as 2017-2021, but is actually 2018-2022), “all residents of SLC, current and prospective, regardless of race, age, economic status, or physical ability can find a place to call home.” But I think it would be better to note the following Goals and Objectives of the plan that align with this proposal:

- Goal 1: Reform City practices to promote a responsive, affordable, high-opportunity housing market.
  - Objective 1. Review and modify land-use and zoning regulations to reflect the affordability needs of a growing, pioneering city.
  - Objective 2. Remove impediments in City processes to encourage housing development.
  - Objective 3. Lead in the construction of innovative housing solutions.

Additionally, you can cite the Council’s 20 Guiding Principles on Housing Development, adopted in 2017. Below are three that align with this proposal:

- 6. Create a net increase in affordable housing units while: i. Avoiding displacement of existing affordable housing to the extent possible, and ii. Retaining and expanding the diversity of AMI and innovative housing types.
- 8. Create a spectrum of housing options for people of all backgrounds and incomes.
- 16. Identify tools to increase and diversify the total housing supply including housing types that the private market does not sufficiently provide such as family housing in the downtown area, innovative housing types, missing middle housing and middle- to low-income apartments.

In summaries and the proposal, I would highlight the standout items/take aways (which are great):

- Missing middle is not a new type of housing, in fact SLC used to do this very well if you look at the Avenues and Sugarhouse.
- Most of RMF-30 is well under density that the master plan calls for.
- By updating these standards, the city hopes to remove some of the zoning barriers that limit new housing developments, while encouraging compatible design and maintain existing housing stock.
- The city’s deeper lots tend to have a significant amount of underutilize land.
- Requiring larger lot areas for these types of housing somewhat force developers to building larger units that are less affordable.
- May encourage more affordable units with smaller footprints.

Other thoughts:

- Do you have any direct positive feedback or input from developers that you can cite?
- When mentioning “affordable,” it’s helpful to clarify that “they would be more affordable as homeowner or rental units due to a smaller interior square footage and lot size, and/or shared common spaces and amenities, similar to Naturally Occurring Affordable Housing.”

**Fire (Ted Itchon):** Thanks for the information, I like to give some input on the above caption. First is thank you for the height requirement. That requirement keeps the customer from providing aerial apparatus roads for their developments. Looking at the Cottage Developments and the Side Oriented Row Homes may be a little more tricky. Because if there are more than 2 residences on a single parcel then there is a Fire Code requirement that we have to apply which is called access.

**Engineering:** No comments.

**Public Utilities:**

Public Utilities has just a few concerns and recommendations for the text amendment. Water and sewer service is required for each lot. Two buildings on the same lot will be required to use a single water service and each building with street frontage should have its own sewer lateral.

Water and sewer services must have 10 feet of horizontal separation. This should be considered for the lot width reduction and lot size reduction.

Lots without street frontage will require an easement from the neighboring lot for water and sewer services. This will also be a requirement for cottage developments. This usually can be identified in the preliminary plat process but will be required in the subdivision improvement plans or 1<sup>st</sup> building permit.

One of the other issues that we are seeing with ADUs, secondary building and buildings without street frontage is the capability for the sewer to drain given the distance to the sewer main from these buildings. Many will not be able to have basements. Some may need to be raised, and in some cases, the adu or additional building cannot meet the requirements. I don't think we have any problem with any of the language, we want to make sure that applicants consider the utility concerns and obstacles that may come up with some of these changes.

The riparian and flood plain ordinances both apply [to Allen Park]. Riparian has some flexibility if it is replacing an existing structure

**Sustainability:** No comments.

**Transportation:** No comments.

**Zoning (Greg Mikolash 3/11/2019):**

- The 'proposed standard' box should be colored orange to indicate a change from the current ordinance regarding maximum building height. It appears the change for building height is now being proposed to be measured from 'established grade' and not 'finished grade' and the height changes from 'the average elevation at each building face' to '30 feet' (but measured to where?). We assume it means '30 feet measured as the vertical distance between the top of the roof and the established grade at any given point of lot coverage'. This should be spelled out clearly, since it is left undefined. This proposal will also require changing the Illustration B in 21A.62.050.

There is a question of why are we returning to counting the number of building stories for determination of maximum height when this was previously removed from the ordinance due to difficulty in determining what is a basement and what is a story on a sloping lot? Why

are we proposing to go back to counting building stories over the simple measurement of height?

The Zoning Reviewers are concerned about the addition of front yard setback averaging (i.e., prevailing setback—the determination of an unknown, ambiguous dimension) into the RMF zones. Front yard averaging offers no positive benefit to our neighborhoods beyond what can be achieved by choosing a (known, non-ambiguous) fixed dimension. Explaining the rationale behind setback averaging is difficult to explain to customers, and it is even more difficult to obtain adequate information on the plans, showing the averaging of setbacks. Ostensibly, requiring front yard averaging extends the timeframe for issuing permits, where also, many new construction projects become contentious if any entity believes these measurements are incorrect. What is the rationale of adding front yard setback averaging to the multi-family zoning districts?