Staff Report

PLANNING DIVISION
DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: Salt Lake City Planning Commission

From: Chris Earl, Associate Planner, christopher.earl@slcgov.com, 801-535-7932

Date: May 20, 2020

Re: Attached Accessory Dwelling Unit – Conditional Use (PLNPCM2020-00064)

Conditional Use

PROPERTY ADDRESS: 2174 S 1900 E
PARCEL IDS: 16-21-228-036-0000
MASTER PLAN: Sugar House – Low Density Residential
ZONING DISTRICT: R-1/7,000 Single-Family Residential

REQUEST: Antonio Padilla, property owner, is requesting Conditional Use approval for an attached accessory dwelling unit (ADU) which will be located in the basement of a new home proposed at approximately 2174 S 1900 E. The current single-family home will be demolished and replaced by a new two-story home. The proposed home will measure approximately 4,184 square feet in size. The attached ADU would be approximately 750 square feet. The property is zoned R-1/7,000 Single-Family Residential, which requires Conditional Use approval for the construction of an ADU.

RECOMMENDATION: Based on the information in this staff report, Staff recommends that the Planning Commission approve the Conditional Use request as proposed, and subject to complying with the following conditions:

1. Compliance with all Department/Division comments and conditions as noted in Attachment H.
2. The property owner shall comply with the registration process as outlined in section 21A.40.200F of the Salt Lake City Zoning Ordinance.
3. Final approval for the development shall be delegated to Planning staff based on the applicant's compliance with the standards and conditions of approval as noted within this staff report.

ATTACHMENTS:

A. Vicinity Map
B. Plans
C. Additional Applicant Information
D. Site Visit Photographs
E. Analysis of Standards - Accessory Dwelling Units
F. Analysis of Standards – Conditional Use
G. Public Process and Comments
H. Department Review Comments

PROJECT DESCRIPTION:
This petition for a Conditional Use is for an attached ADU to be located in the basement of a single-family dwelling located at approximately 2174 S 1900 E. The ADU is part of a proposal to demolish the existing single-family dwelling and replace it with a new single-family dwelling on the subject property. The new home will measure approximately 4,184 square feet in size with a footprint of approximately 2,114 square feet. The subject parcel is located on the west side of 1900 East between 2100 South and Wilmington Avenue.

Current home on the subject

Proposed home on the subject

The proposed attached ADU would be located in the basement of the proposed home and would be approximately 750 square feet. The entrance to the proposed ADU would face the north interior side lot line.

The parking for the existing house is accommodated by two (2) off-street parking spaces within a garage with driveway access from 1900 E. A legal off-street parking space will be provided adjacent to the garage and will be accessed from the same driveway on the property. Legal on-street parking is available along 1900 E. The subject property is also located within one-quarter (1/4) mile of a transit stop, with the nearest bus stop located at approximately 1905 E 2100 S .

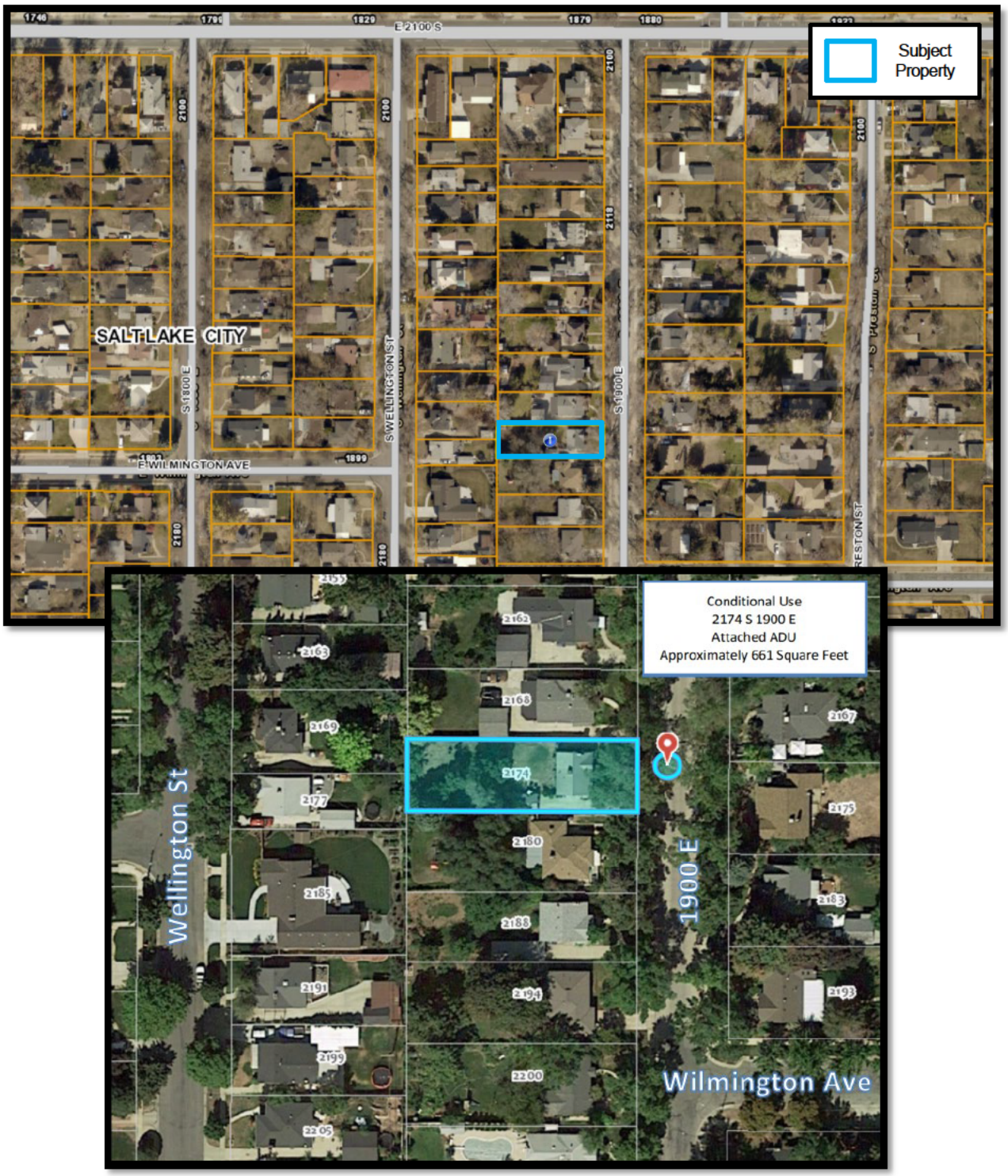
PLANNING COMMISSION REVIEW:
The property is zoned R-1/5,000 Single-Family Residential. A Conditional Use approval is required for any ADUs that are located in a single-family zoning district. For complete analysis and findings for compliance with zoning standards for Accessory Dwelling Units and Conditional Use standards, please refer to Attachment E and Attachment F.

NEXT STEPS:
Approval of Conditional Use
If approved, the applicant may proceed with the project, subject to all conditions imposed by City departments and/or the Planning Commission and will be required to obtain all necessary permits. Building permits and certificate of occupancy for the building would only be issued contingent upon all conditions of approval are met, including the registration process requirements outlined in 21A.40.200F of the zoning ordinance.

Denial of Conditional Use
State and City code require that a Conditional Use be approved if reasonable conditions can be imposed on the use to mitigate any reasonably anticipated detrimental effects of the use. A Conditional Use can only be denied if the Planning Commission finds that reasonably anticipated detrimental effects cannot be mitigated with the imposition of reasonable conditions.

If denied, the applicant would not be permitted to construct an ADU. The basement could still be constructed with the approvals of all applicable City departments but could not contain an accessory dwelling.

ATTACHMENT A: VICINITY MAP

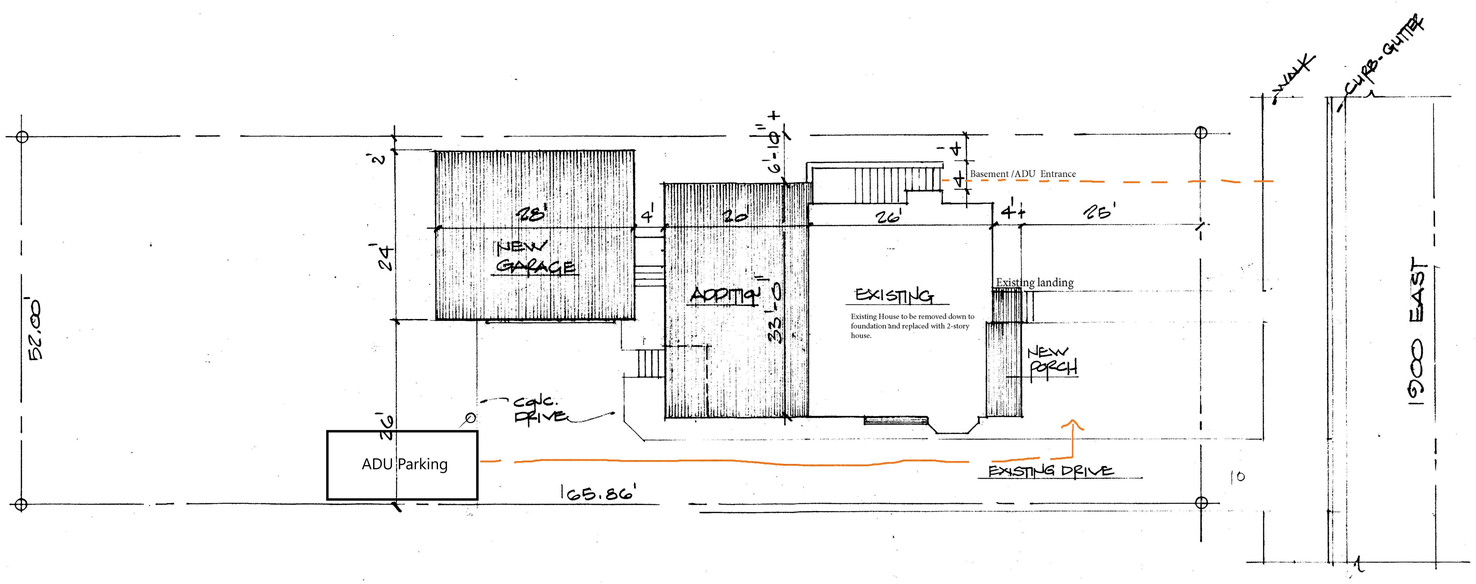


ATTACHMENT B: PLANS

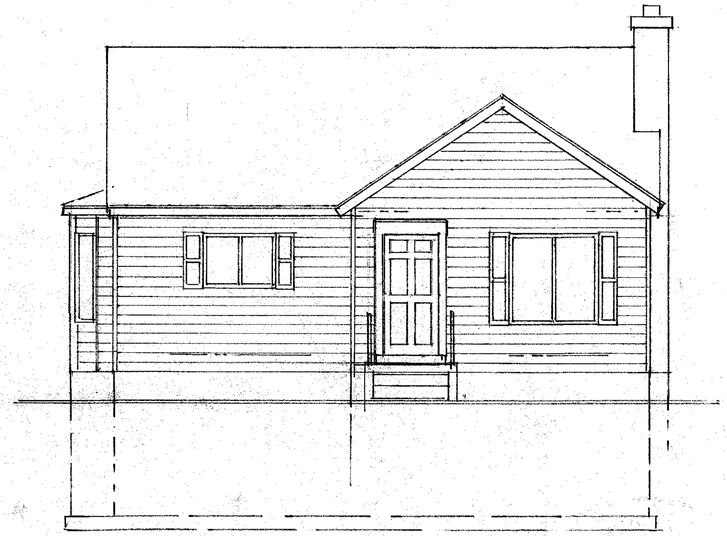
W k t t DU

NORTH

1"=10'-0"
SCALE



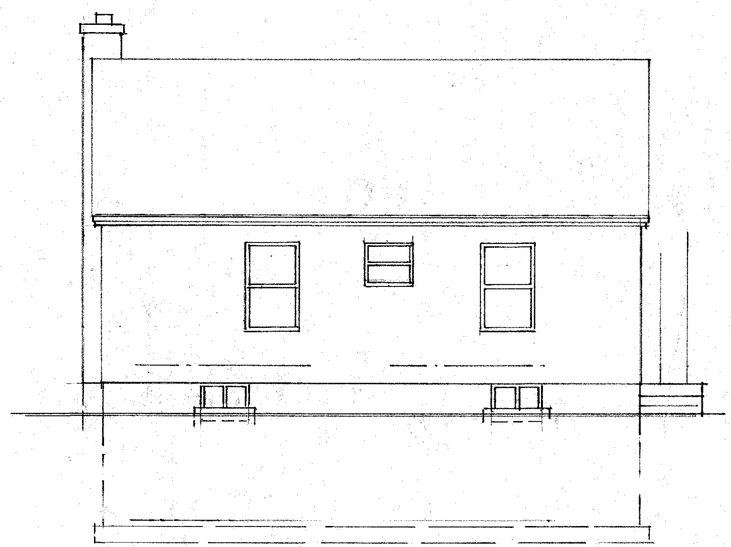
PRELIMINARY SITE PLAN



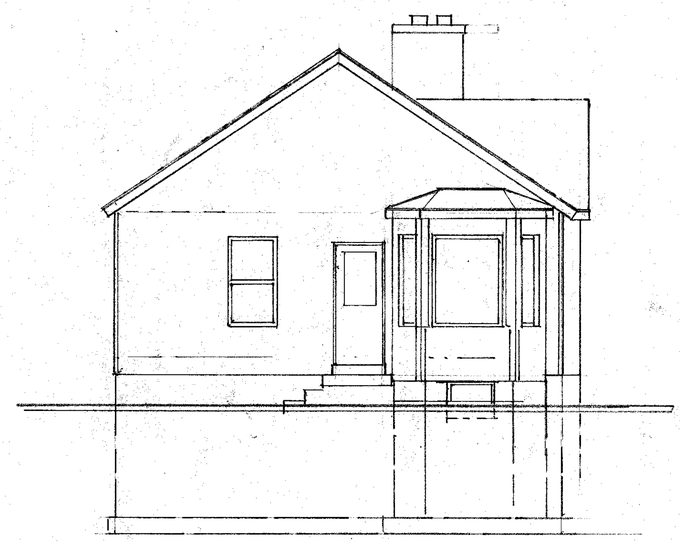
EXISTING FRONT 'EAST' ELEV.

1/4" = 1'-0"

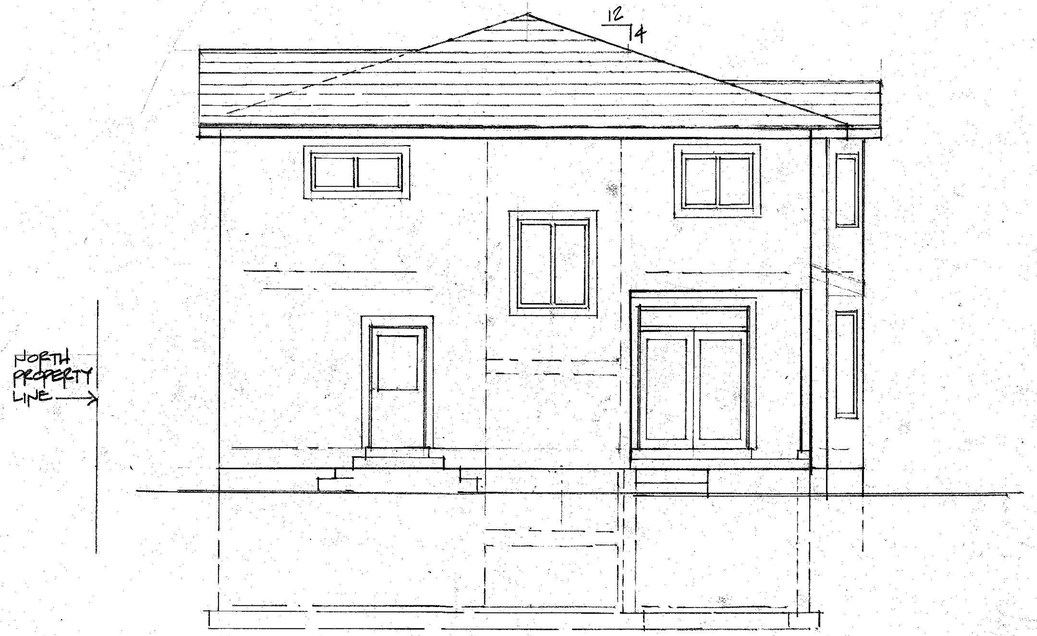
RIGHT SIDE 'NORTH' ELEV.



EXISTING REAR 'WEST' ELEV.



LEFT SIDE 'SOUTH' ELEV.

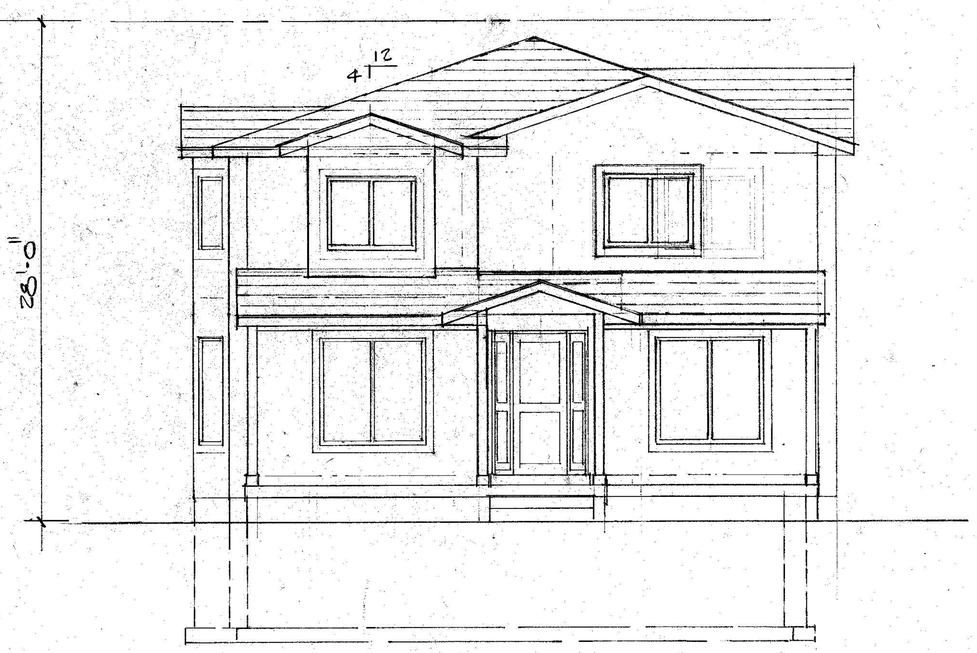


REAR 'WEST' ELEV.

RIGHT SIDE 'NORTH' ELEVATION

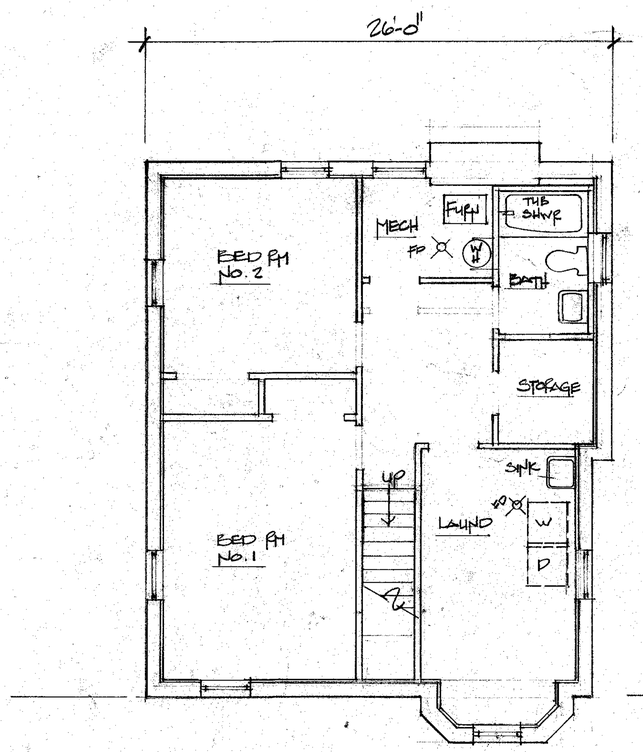
1/4"=1'-0"

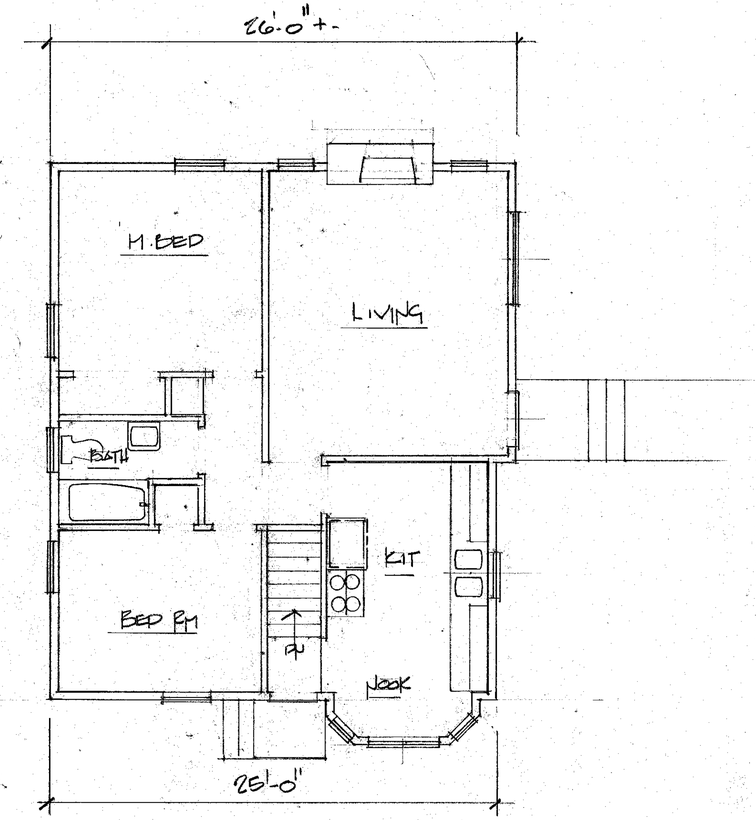
LEFT SIDE 'SOUTH' ELEVATION

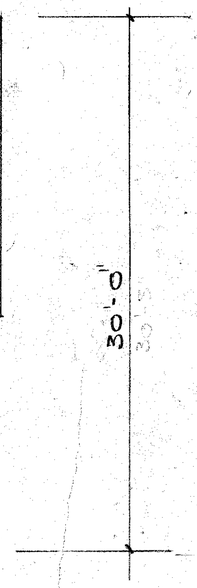


FRONT 'EAST' ELEVATION

PADILLA RESIDENCE



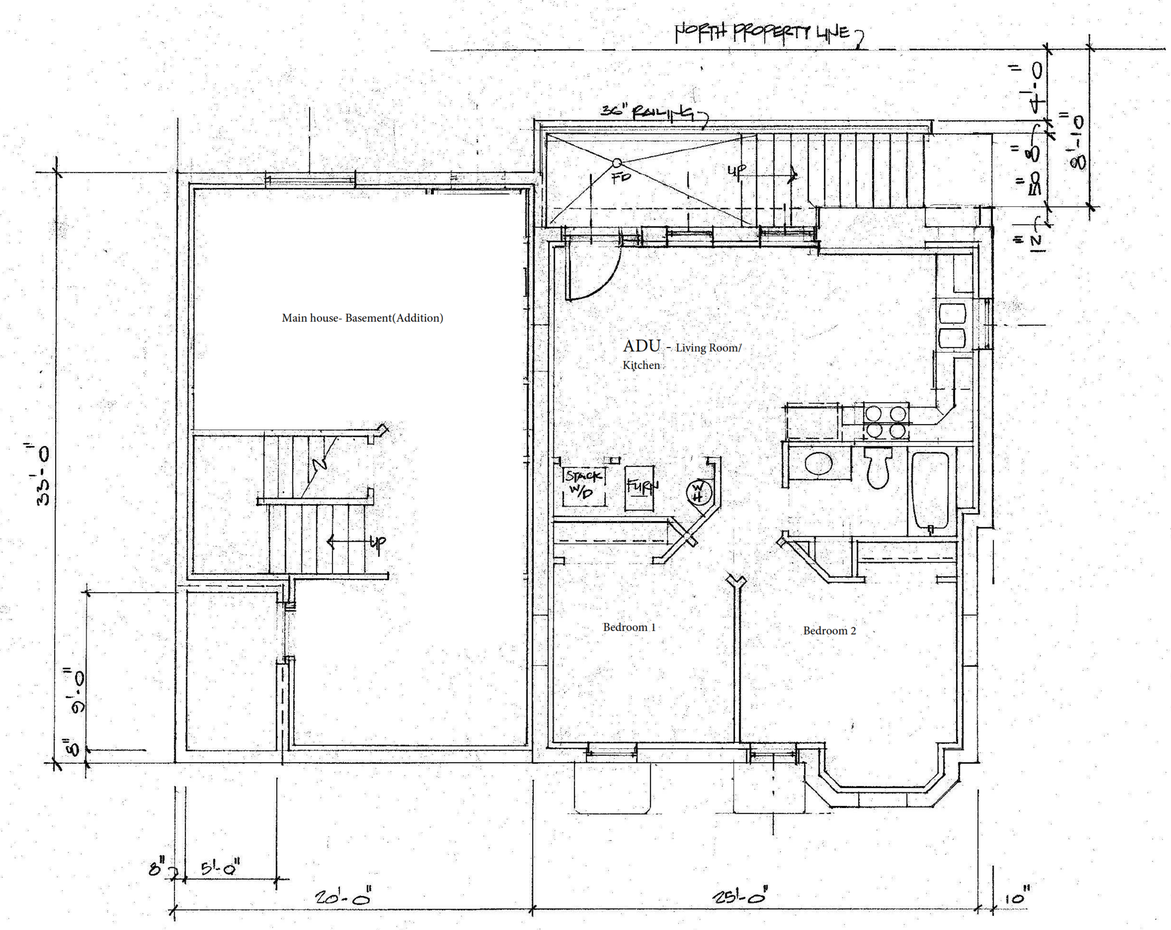




EXISTING BASEMENT

1/4" = 1'-0"

EXISTING MAIN FLOOR



BASEMENT FLOOR PLAN 1/4"=1'-0"

SHT. NO.

ATTACHMENT C: ADDITIONAL APPLICANT INFORMATION

Project description:

- We're proposing to construct an ADU in the basement of our home. As part of the construction, the existing house will be removed down to the foundation and reconstructed with a two-story house. We will add a basement entrance on the north side yard for the ADU, and remove the interior stair. The project also includes a rear addition to the house and a new 2-car garage.

ATTACHMENT D: SITE VISIT PHOTOGRAPHS

**Please note that these photos depict the current home on the property. This home is proposed to be demolished and replaced with a new two-story home. The existing detached garage will remain.*

Top:
Street View of the Subject Property

Middle:
1900 East Looking South

Bottom:
1900 East Looking North

Top:
Street View of the Driveway Entrance

Middle:
View of the North Side of the Subject Property.
Proposed Location of ADU Entrance.

Bottom:
View from Driveway Looking Out to 1900 East

Top:
View of the Rear Yard from the South Side Yard of the Subject Property

Bottom:
View of the Rear Yard from the North Side Yard of the Subject Property

ATTACHMENT E: ANALYSIS OF STANDARDS - ACCESSORY DWELLING UNITS

21A.40.200: Accessory Dwelling Units

Standard	Proposed	Findings
Size ***No accessory dwelling unit shall occupy more than fifty percent (50%) of the gross square footage of the single-family dwelling. The square footage of an attached garage shall not be included in the gross square footage unless the accessory dwelling unit is located in a basement that includes habitable space below the garage.***	Principal dwelling will be approximately 4,934 SF. Fifty percent (50%) of principal dwelling equals approximately 2,467 SF. Proposed ADU is approximately **750**.	Complies
Maximum Coverage ***The surface coverage of all principal and accessory buildings shall not exceed forty percent (40%) of the lot.***	Lot size is approximately 8,624 SF. Forty percent (40%) of the lot is approximately 3,449 SF. Primary Dwelling: 2,114 SF Total Coverage: 2,114 SF The surface coverage of all principal and accessory buildings is approximately **25%** of the lot.	Complies
Entrance Locations ***Entrances to an accessory dwelling unit that are located within a single family dwelling shall only be permitted in the following locations:*** 1. ***An existing entrance to the single family dwelling;*** 2. ***When located on a building facade that faces a corner side yard, the entrance shall be set back a minimum of twenty feet (20') from the front building facade;*** 3. ***Exterior stairs leading to an entrance above the***	The entrance for the proposed ADU is oriented towards the side [north] property line. The entrance is approximately **10'** from the side property line and is considered a side entrance.	Complies

first level of the principal structure shall only be located on the rear elevation of the building; *4.* ***Side entrances to an accessory dwelling unit are not considered a principal entry to the building and are exempt from subsection 21A.24.010H, "Side Entry Buildings", of this title;*** *5.* ***Located on the rear facade of the dwelling;*** *6.* ***Located in a side yard provided the side yard is at least eight feet (8') in width. Stairs leading to an ADU in the basement are permitted to encroach into the side yard.***		
Parking ***An ADU shall require a minimum of one on-site parking space.*** ***The parking requirement may be waived if:*** *(1)* ***Legally located on street parking is available along the street frontage of the subject property; or*** *(2)* ***The subject property is located within one-quarter (¼) mile of transit stop.***	The principal dwelling has two (2) off-street parking spaces located within a garage accessed by a driveway along the side [south] property line. A parking space for the ADU is provided towards the rear of the property, adjacent to the attached garage. It will be accessed via the same driveway that provides garage access for the home. The ADU parking requirement could be waived as there is a legally located on-street parking available along 1900 E and the subject property is located within a ¼ mile of a transit stop, however, off-street parking is proposed	Complies

ATTACHMENT F: ANALYSIS OF STANDARDS – CONDITIONAL USE

21A.54.080: Standards for Conditional Uses

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

1. The use complies with applicable provisions of this title;

   Analysis: The proposed ADU use is located in the R-1/7,000 zoning district, which allows for an ADU to be approved through the conditional use process, subject to meeting the specific regulations for an ADU in section 21A.40.200 of the zoning ordinance. As analyzed in Attachment E, the ADU complies with the requirements of 21A.40.200.

   Finding: The proposed use will comply with the applicable provisions of the Salt Lake City Zoning Ordinance.

2. The use is compatible, or with conditions of approval can be made compatible, with surrounding uses;

   Analysis: The proposed ADU use is a small residential unit that should be readily compatible with surrounding uses, which are all single-family homes. The ADU will be located in the basement of the home and, unlike detached ADUs which are located within a separate structure on the property, this ADU will have no visual impact on this property or surrounding properties. The home and ADU were designed for cohesiveness between the home and ADU in order to present a structure that appears visually to be a single-family home. The proposed ADU meets all the requirements in terms of size, entrance location and parking.

   Finding: The proposed use is compatible with the surrounding uses.

3. The use is consistent with applicable adopted city planning policies, documents, and master plans; and

   Analysis: The proposal is located in the 21st and 21st Neighborhood within the Sugar House Master Plan area. The master plan designates the future land use of this area as low density residential and the existing zoning on the property is R-1/7,000 Single-Family Residential.

   The purpose of the R-1/7,000 Single-Family Residential District is to provide for conventional single-family residential neighborhoods. 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.

   The purpose of accessory dwelling units are to:

   1) Create new housing units while respecting the appearance and scale of single-family residential development;

2) Provide more housing choices in residential districts;
3) Allow more efficient use of existing housing stock, public infrastructure, and the embodied energy contained within existing structures;
4) Provide housing options for family caregivers, adult children, aging parents, and families seeking smaller households;
5) Offer a means for residents, particularly seniors, single parents, and families with grown children, to remain in their homes and neighborhoods, and obtain extra income, security, companionship, and services;
6) Broaden the range of affordable housing throughout the City;
7) Support sustainability objectives by increasing housing close to jobs, schools, and services, thereby reducing greenhouse gas emissions and fossil fuel consumption;
8) Support transit-oriented development and reduce auto usage by increasing density near transit; and
9) Support the economic viability of historic properties and the City's historic preservation goals by allowing accessory dwellings in historic structures.

The proposed ADU is consistent with the following Residential Land Use Goals included in the Sugar House Master Plan:

- Encourage the creation and maintenance of a variety of housing opportunities that meet social needs and income levels of a diverse population.
- Ensure preservation of low-density residential neighborhoods.
- Encourage a mix of rental properties for those who cannot afford or do not choose home ownership.
- Support the efforts of the Housing Division and the Redevelopment Agency to provide residential construction in all qualifying neighborhoods within the Central Community.

The proposal is also consistent with the goals and policies outlined in ***Growing SLC: A Five Year Housing Plan*** which aims to increase housing options, promote diverse housing stock, and allow for additional units while minimizing neighborhood impacts.

Finding: The uses are consistent with applicable adopted city planning policies, documents, and master plans.

4. The anticipated detrimental effects of a proposed use can be mitigated by the imposition of reasonable conditions (refer to Detrimental Effects Determination analysis below).

21A.54.080B: Detrimental Effects Determination

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

Standards	Finding	Rationale
1. This title specifically authorizes the use where it is located;	Complies	The proposed ADU is an accessory residential use and is allowed as a conditional use within the R-1/7,000 zoning district. The proposed ADU complies with all specific regulations for an ADU including size, entrance

		location, parking, etc. as outlined in Attachment E.
2. The use is consistent with applicable policies set forth in adopted citywide, community, and small area master plans and future land use maps;	Complies	The uses are located in an area zoned and designated by the associated master plan for low density residential. This land use designation allows moderate sized lots (i.e., 3,000-10,000 square feet) where single-family detached homes are the dominant land use. Low-density includes single-family attached and detached dwellings as permissible on a single residential lot subject to zoning requirements.
3. The use is well suited to the character of the site, and adjacent uses as shown by an analysis of the intensity, size, and scale of the use compared to existing uses in the surrounding area;	Complies	Uses surrounding the subject property are generally single-family residential properties. The proposed ADU will be located within the principal structure and would not be located closer to the residential structures on adjacent lots than what is permitted by the zoning ordinance for principal residential structures. The proposal complies with the size requirements for an ADU, which can be up to 50% of the gross square footage of the principal structure.
4. The mass, scale, style, design, and architectural detailing of the surrounding structures as they relate to the proposed have been considered;	Complies	The proposed ADU is located within the basement of the principal structure and would be compatible with surrounding structures. Location of the proposed ADU in the basement would lessen the impact on adjacent properties.
5. Access points and driveways are designed to minimize grading of natural topography, direct vehicular traffic onto major streets, and not impede traffic flows;	Complies	The proposed main house on the subject property has a driveway located off 1900 E. No new access points are proposed, and the proposal would not impede traffic flows.
6. The internal circulation system is designed to mitigate adverse impacts on adjacent property from motorized, nonmotorized, and pedestrian traffic;	Complies	The proposed ADU would be accessed from 1900 E. The proposed ADU is also located within ¼ mile of the transit stop located at 1905 E 2100 S and has legally located on-street parking. It is not anticipated that the proposed ADU would create any adverse impacts in terms of motorized, nonmotorized and pedestrian traffic.

7. The site is designed to enable access and circulation for pedestrian and bicycles;	Complies	The site is designed for pedestrian and bicycle access. The site plan shows a path from the sidewalk to the proposed ADU.
8. Access to the site does not unreasonably impact the service level of any abutting or adjacent street;	Complies	There is vehicular access to the site. No unreasonable impacts to the service level of the adjacent streets is anticipated.
9. The location and design of off-street parking complies with applicable standards of this code;	Complies	One (1) parking space would be legally located on the subject property and would be accessed from 1900 E for the proposed ADU. Additionally, Utah Transit Authority bus stop #21 (1905 E 2100 S) is approximately .17 miles from the subject property. Parking for the proposed ADU may be waived because of the availability of on-street parking in front of the subject property or ¼ mile proximity to a transit stop.
10. Utility capacity is sufficient to support the use at normal service levels;	Complies with Conditions	The Public Utilities department did not provide comments on the project, however, the utility plan would be reviewed for compliance during building permit review.
11. The use is appropriately screened, buffered, or separated from adjoining dissimilar uses to mitigate potential use conflicts;	Complies	The proposed ADU will be located in the basement of the principal structure and would not require screening above what is required by zoning ordinance for the principal structure. The property currently has a solid wood fence and chain-link fence with privacy slats along the property lines, and this provides screening from the adjacent properties.
12. The use meets city sustainability plans, does not significantly impact the quality of surrounding air and water, encroach into a river or stream, or introduce any hazard or environmental damage to any adjacent property, including cigarette smoke;	Complies	The use does not negatively impact sustainability plans. The project supports sustainability objectives by increasing housing close to jobs, schools, and services, thereby reducing greenhouse gas emissions and fossil fuel consumption.
13. The hours of operation and delivery of the use are compatible with surrounding uses;	Complies	The proposed use is an accessory residential structure and is compatible with the surrounding uses that are also residential.

14. Signs and lighting are compatible with, and do not negatively impact surrounding uses; and	Complies	Signs are not associated with this proposal. Any lighting on the accessory structure is not expected to have a negative impact on the surrounding uses or otherwise cause a nuisance.
15. The proposed use does not undermine preservation of historic resources and structures.	Complies	The property is not located within a Local Historic District and the proposal does not involve removal or any historic resources or structures.

Finding: In analyzing the anticipated detrimental effects of the proposed ADU, Staff finds that with the conditions identified in the analysis, the request complies with the criteria listed above.

ATTACHMENT G: PUBLIC PROCESS AND COMMENTS

Meetings: The Sugar House Community Council held a virtual meeting on April 20, 2020 to discuss this project and gather public comment. Staff as well as the applicant were in attendance.

Public Notice:

- Early notice of application mailed on February 26, 2020
- Public hearing notice mailed on May 15, 2020
- Public hearing sign posted on the property on May 15, 2020
- Agenda posted on the Planning Division and Utah Public Meeting Notice websites on May 15, 2020

Public Comments:

- At the time of this publication, staff has received comments provided by Judi Short, Vice Chair, Sugar House Community Council. Those comments are attached below.
- Any additional comments received after the publication of the staff report will be forwarded to the Planning Commission.

Sugar House
COMMUNITY COUNCIL

May 7, 2020

TO: Salt Lake City Planning Commission

From: Judi Short, Vice Chair and Land Use Chair

RE: PLNPM2020-00064 Conditional Use Accessory Dwelling Unit (ADU) 2174 S 1900 East

The Sugar House Community Council did its usual review of this land use request. We put the project on our website, with a comment form for people to give us feedback. We made a flyer and put it on the porches of homes on the two side streets, and included a link to the project and feedback form. We received a number of comments, which are attached. We also put this in our newsletter, which reaches about 1800 people, and it was one of the seven land use projects on the agenda for our virtual LUZ meeting on April 20.

This is a request to build an ADU at this address. The existing single-family home will be demolished, and the existing foundation will be used to build a new house, plus an addition on the rear. The ADU will be in what was the basement of the old house.

This is an ideal proposal for an Accessory Dwelling Unit. Rather than using up most of the back yard for an ADU or building a two-story ADU that might provide visual encroachment into a neighbor's yard, the ADU is internal to the main house. And, there is a parking place on the main property, rather than just relying on street parking. The comments from the neighbors indicate that because there are now a lot of rentals on their street, the street is very crowded and feels very narrow, especially on garbage day. Providing this off-street parking will help alleviate that problem. We notice that the ADU will have two bedrooms. We suggest that a second parking spot for the ADU could be located on the east side of the planned single parking space so there are two spaces in tandem for this unit. If possible, we would like you to make this a condition for approval of this ADU.

We ask that you approve this ADU with the condition we suggest.

Enclosure:

Comments from the website:
Flyer

COMMENTS – 2174 SOUTH 1900 EAST ACCESSORY DWELLING UNIT

Accessory Dwelling Unit: A big NO. Just googled this property and lot is so small. No place to park and too crowded/scrunched on lot. For further research points: I spoke with a customer last week who is in the process of working with an attorney to sue over an ADU which has caused her to re-landscape the yard in their beloved home because shade from the large ADU is preventing her to grow a garden due to the new structure blocking out all sun in her backyard. In another neighbors words, "ADU's only benefit the person building the ADU and ruin the neighborhood". In addition, I contacted two highly respected SugarHouse realtors that agree that having an ADU does NOT increase value of the homes in surrounding neighborhood; they actually have a negative impact. I think that any ADU request put through on a small lot should be declined due to being a fire hazard and encroachment on neighbors.

Sue Watson

From: Robert Grandy <[redacted]>
<[street-address]>

If this ADU is built, we will have to allow others to do the same. That will destroy the character and nature of 1900 east as we will become a high density neighborhood (with all the associated problems).

I don't mind the house being torn down and a larger one built in its place. I would rather not see an Accessory Dwelling Unit (ADU) built there too. We have multi-unit dwellings on the North-West part of the street that have contributed to parking and late night noise problems off and on over the years. The street doesn't need more of that.

From: John A. Young <[redacted]>
<[street-address]>

I would like to thank the person who placed the flier on my front porch. I live on 1900 east on the east side of the street since 1960. I am opposed to the proposed plan. We do not need a hotel/apartment on this block. Currently the street has become too narrow due to all of the on-street parking. The street at times becomes a one lane street and it is very hard to see children at play. Sometime it is even hard to place garbage, recycling and yard waste cans out on normal garbage days due to all of the vehicles parked on the street. There is an assumption that the accessory dwelling unit will only have one vehicle. There is little information about the main dwelling on where parking would occur. I do understand the ordinance regarding parking is based on the square feet requirement. It just seems to me that the size of the dwelling would increase (from photo in flier), ergo needing more parking. The information claims there would be a two-car garage. Does that mean that one of the spots is for the accessory dwelling parking and the other for main dwelling? The assumption that either unit will only have one vehicle is a fallacy. The height would not be in the character of the neighborhood. My understanding is the the "new" dwelling would be three stories high: two for the main dwelling and a third for the accessory dwelling. In reality, what this proposal is requesting is a single dwelling apartment with the possibility of the other unit becoming apartments as well.

Apr 7, 2020, 10:33 PM (2 days ago)

Randy Silverman
to me

Hi Judy,

I don't know if our street is zoned for an ADU. Is it?

If not, what is the problem with building an ADU? If so, and the ADU construction met the building code, is there a down side to that?

Many thanks for your thoughts on this,
Randy

Randy Silverman

Hi Judi,

We are supportive of the project. [redacted]

All best wishes,
Rand

to me

From: Michelle Gurr <[redacted]>
<[street-address]>
Comments on 2174 S 1900 E

I live across the street from 2174 S. 1900 E. I am opposed to the addition of and accessory dwelling unit. 1900 East has entirely too many rentals, and too many cars parked on the street.

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From: george chapman
To: Earl, Christopher
Subject: (EXTERNAL) 2174 S 1900 E against ADU since it is over 650 sq ft
Date: Tuesday, May 26, 2020 9:03:04 AM

I know and like the property owner but feel that the ADU should be limited to the 650 sq ft that we were all promised when the ADU ordinance was passed.

George Chapman
[redacted]

ATTACHMENT H: DEPARTMENT REVIEW COMMENTS

Fire (Doug Bateman at douglas.bateman@slcgov.com)

Provide site plan with locations of fire hydrants that provide required fire flows and are located within 600-feet of all first story exterior portions of structures on the parcel. Measurements are in straight lines and right angles.

Engineering (Scott Weiler at scott.weiler@slcgov.com or 801-535-6159)

No need for Engineering to review ADU applications that have no effect on the public way.

Transportation (Michael Barry at michael.barry@slcgov.com or 801-535-7147)

One additional off street parking space is required for the ADU; it appears that this has been provided.

Public Utilities (Jason Draper at jason.draper@slcgov.com or 801-483-6751)

No comment provided.

Building (Tim Burke at timothy.burke@slcgov.com or 801-535-7746)

This proposed project requires a formal IRC review for the complete design package. This is to include but not limited to: site, structural, architectural, mechanical, electrical and plumbing scopes of work.

As discussed with the applicant in our office, ensure that the drawings show all utilities to the ADU are independently controlled (i.e. can be shut off when the main dwelling occupants are not available).

Thank you.

Zoning (Anika Stonick at anika.stonick@slcgov.com or 801-535-6192)

PLNPCM2020-00064, Conditional Use Permit petition to have Accessory Dwelling Unit at 2174 So. 1900 East; comments prepared by Anika Stonick, Development Review Planner II; property is zoned R-1/7000 and would create ADU in basement of existing SFD structure while also removing existing above ground portion of SFD structure down to foundation then rebuild with addition to rear and upper floor level; applicant needs to determine if removal work that is proposed amounts to a total demolition of the existing structure (that would be per 21A.62.040 "COMPLETE DEMOLITION: Any act or process that destroys or removes seventy five percent (75%) or more of the exterior walls and/or total floor area of a structure, improvement or object.") and understand that a complete demolition proposal will require a separate demolition permit.

To verify proposal is for an ADU at a parcel with single family use otherwise only, floor plans for the main and upper floor level of the SFD portion of structure should be

provided for review for there to be condition that “All living areas of a single-family dwelling shall be accessible and occupied by the entire family” (of 21A.62.040 definition of Dwelling, Single Family).

Front yard setback is to be per 21A.24.060.E.1, which, if new construction would come forward of existing front line of building (which might be wall or roof support column, for example) will mean there is need to determine average of setbacks of principal buildings on block face and then meet or exceed the average (see how-to brochure at link http://www.slcdocs.com/building/Front_Yard_Averaging_3_2016.pdf).

R-1/7000 required side yard of 10’ to be met by bay window bump out on driveway side of parcel or may only be one story to satisfy allowance of 21A.36.020.B table.

Proposed structure heights are measured using both existing and proposed grades information (overall structure height is compared to existing grade while interior wide yard wall height is compared to proposed grade). Site and elevation plans should depict both existing and proposed grades. If no (zero) grade changes would occur with proposed work grade line on elevation drawings may be labeled with “existing=proposed.”