



Staff Report

PLANNING DIVISION
DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: Salt Lake City Planning Commission

From: David J. Gellner, AICP, Principal Planner - 801-535-6107 - david.gellner@slcgov.com

Date: February 12, 2020

Re: PLNPCM2019-01012 - Conditional Use for the Sacred Circle Medical Recovery Facility

CONDITIONAL USE

PROPERTY ADDRESS: 660 South 200 East

MASTER PLAN: Downtown Plan (2016)

ZONING DISTRICT: D-2 – Downtown Support Zoning District

REQUEST: Sacred Circle Healthcare is requesting Conditional Use approval for a new medical detoxification and recovery facility to be located on the first floor in the existing building located at 660 South 200 East in the D-2 – Downtown Support zoning district.

RECOMMENDATION: Based on the information in this staff report, planning staff recommends that the Planning Commission approve the Conditional Use. In order to comply with the applicable standards, the following conditions of approval shall apply:

1. *Applicant shall comply with all other department/division requirements.*

ATTACHMENTS:

- A. [Area Zoning Map](#)
- B. [Property & Context Photos](#)
- C. [Applicant's Narrative & Plans](#)
- D. [Existing Conditions & Zoning Requirements](#)
- E. [Analysis of Standards – Conditional Use](#)
- F. [Public Process and Comments](#)
- G. [Department Comments](#)

PROJECT DESCRIPTION:

This request is for a new medical detoxification and recovery facility to be located on the first floor in an existing building located at 660 South 200 East. The proposed use will occupy approximately 17,302 square feet of the existing building. Forty (40) spaces on the first floor of the parking garage will be dedicated to the proposed use. The proposed 14-bed in-patient facility will have 24-hour supervision as well as security, counseling and medical services provided by a multi-disciplinary team. The facility is classified as a Dwelling - Large Group Home and is allowed as a Conditional Use in the D-2 zoning district.



KEY CONSIDERATIONS:

The key considerations listed below have been identified through the analysis of the project, neighbor and community input and department review comments.

Consideration 1: Neighborhood Compatibility and Anticipated Impacts

The proposed use will be located within an existing building in the downtown area in close proximity to a variety of other government and social services and facilities. This includes the Department of Workforce Services offices, Salt Lake County Health Department Health Center, the Geraldine E. King Women's Resource Center, Immigration and Naturalization offices. There are also several small professional offices in the area and Salt Lake City has offices for Compliance, Youth and Family Services and other functions on 600 S between 200 E and 300 E. The primary zoning on the west side of 200 E and to the north, south and west of the subject property is D-2 – Downtown Support zoning district.

On the east side of 200 E, the zoning is a mix of D-3 (Downtown Warehouse/Residential), RO (Residential Office), RMF-45 (Moderate/High Density Multi-Family) and RMF-75 (High Density Residential). Developed uses include professional offices and multi-family housing.

The proposed use will not be out of character for the area and will not introduce any new or significant impacts beyond those of the current use and other uses in the vicinity.

Consideration 2: Master Plan Compliance

The Growth and Development map contained in the Downtown Plan (2016) recognizes that the uses in this area will continue to grow and develop over time. Given the proximity to the Central Business District, many of these functions will be for downtown support activities as reflected in the D-2 zoning of the property. As mentioned previously, the general area has been developed for a variety of social and government services and professional office uses. The use is in concert with the Downtown Plan and anticipated changes to the area over time.

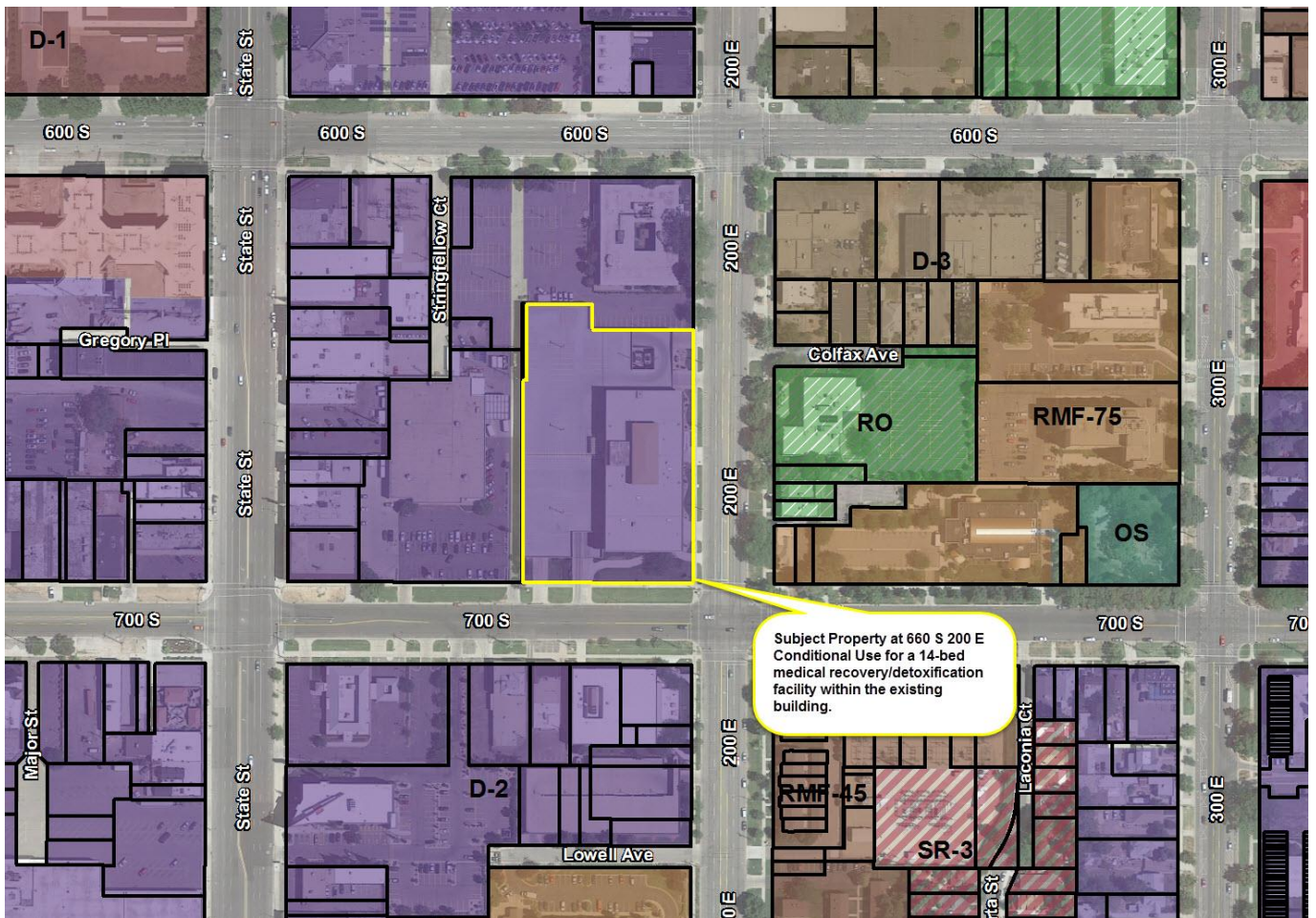
DISCUSSION:

The applicant is proposing a use that is allowed in the zoning district and that is in concert with the established nature of the area. The applicant's narrative is included in [Attachment C](#) of this report. Staff recommends that the Conditional Use application be approved by the Planning Commission.

NEXT STEPS:

If the Conditional Use application is approved, the applicant will be required to comply with all other department and division requirements and obtain all necessary building permits for the project.

ATTACHMENT A: AREA ZONING MAP



ATTACHMENT B: PROPERTY & CONTEXT PHOTOS



East façade of building facing west across 200 East



East façade of building facing south on 200 East



South façade of building facing 700 South



South façade of building where parking garage and HRC property intersect.



Development on the east side of 200 E – multi-family and office uses.



Department of Workforce Services – south side of 700 S directly across from subject property.



Separate parking garage entrance off of 700 S on the south-west corner of the existing building. Facility entrance is on the interior of the parking garage.

ATTACHMENT C: APPLICANT'S NARRATIVE & PLANS

The detailed narrative found on the following pages was submitted by the applicant.



Conditional Use Application

To:
Planning Counter
451 s State Street, Room 215
SLC, UT 84111
801-535-7700

From:
Sacred Circle Healthcare
Attn: Matt Judd and/or Josh Anderson
660 s 200 e
SLC, UT 84111



I. Project Description

- a. Thank you for the opportunity to apply for this Conditional Use permit. At Sacred Circle Healthcare we pride ourselves in providing exceptional care to all our patients. We see a diverse population with many different cultures and backgrounds. Our clinic was founded and created by the Confederated Tribe of the Goshute Reservation and we take pride in not only serving tribal members but also all Native Americans and residents of Salt Lake County who have Medicaid, Medicare, or are underinsured. We currently provide services in primary care, behavioral health, dentistry, podiatry, urology, pain management, physical therapy, dietary and pharmaceutical.

As we have evaluated our services, and the patients that we serve, we have recognized that there is a lack of services surrounding the opioid epidemic problems that currently affect our community and the underinsured. Our proposal is to open a 14 bed Opioid Use Disorder Detoxification service that would not only provide patients a safe and affordable option for treatment but also educate them on how to combat this illness.

Our services will include a medically monitored inpatient detoxification service including 24-hour medically supervised detoxification services targeting the management of acute intoxication and withdrawal from the following substances: amphetamine, methamphetamine, and opioids. The Inpatient Detoxification services will treat the patient utilizing the following three elements: Evaluation, Stabilization and Fostering patient's entry into substance abuse treatment. Services will be provided by an interdisciplinary team of competently trained clinicians (Physicians, Psychologists, LPN, RN, Counselors and Social Workers). Individual counseling, family counseling and group therapies will be employed as appropriate.

As we continue to treat our patients in the best manner possible we feel that a detoxification center will not only impact our current patient population but also provide a service to other medical practices who are trying to help patients with Opioid Use Disorder.

II. Conditional Use Information

- a. We plan to operate our center 24 hours a day 7 days a week.
- b. Our center will be located on the first floor of the 660 s 200 e building in Salt Lake City. The first floor of that building is actually the basement of the building and has separate parking

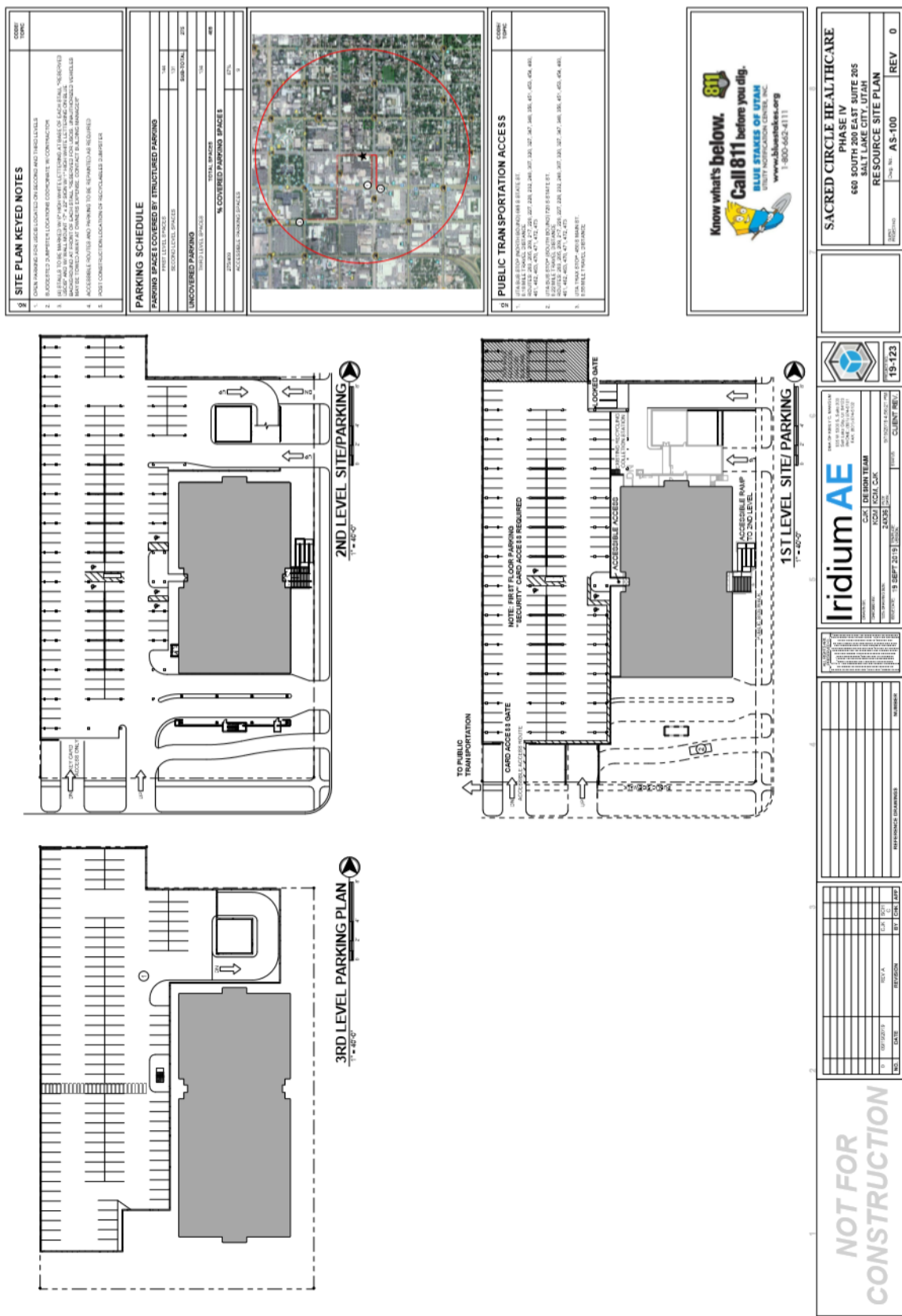
and entrance from the parking structure. Elevators and stairs are also available for use if patients or family enter from the street level on the second floor. We currently occupy the second and co-occupy the third floor with the Mexican Consulate and First Step (a ambulatory substance abuse program). Surrounding our building is the following:

- i. Department of Workforce services – Job corp
 - ii. Volunteers of America Geraldine E King Women’s Center – Women’s homeless shelter
 - iii. Project Reality – Ambulatory addiction treatment center
 - iv. The Target Group – A public relations firm
 - v. The Utah State Bar – Legal services
 - vi. Salt Lake Public Health Center – Ambulatory healthcare center and public health department
 - vii. Odyssey House - Residential treatment center
- c. Our highest shift will be our 7-4 shift which will employ approximately 25 staff members
 - d. Our facility will not incorporate seats but can house 14 individuals with an extra 4 rooms if needed for a total of 18
 - e. As we have discussed our services with Volunteers of America, Project Reality, Odyssey house and our current building owners they have been very supportive of us increasing the use of the building and providing a much-needed service. We have begun partnering with some of these services to make sure we collaborate in treatment models and resource when needed. Some questions that have been raised is security of the patients since it is a 24-hour center. We have designed a very safe and secure area and we chose the first floor of the building as it is more secluded from the rest of the building with the appropriate fire exits and safety to our patients. We also have in our plans to employ security 24/7 for the facility and contact our local law enforcement of the center we hope to build.

III. Minimum Plan Requirements

- a. The following is attached
 - i. One paper copy (24 x 36) of each plan and elevation drawing
 - ii. A digital (PDF) copy of each plan and elevation drawing (thumb drive provided)
 - iii. One 11 x 17 inch reduced copy of each plan and elevation drawing

IV. Site Plan



YR BUILT:	1978
EFFECTIVE YEAR BUILT:	1990
LAND BUILDING RATION:	0.81
LOT USE:	COMMERCIAL
50 FT:	115.815
ACRES:	2.678
ZONE:	C2-PUBLIC
NEIGHBORHOOD:	D3
NEIGH GROUP:	7520
NEIGH TYPE:	5021
NEIGH DIST:	STATIC
TRAFFIC:	INTERMEDIATE
TRAFFIC INFLUENCE:	MEDIUM
STREET TYPE:	1,200
STREET TYPE:	TYPICAL
STREET TYPE:	THORNY
CURB OUTLINE:	UNPAVED
SIDWALK:	YES

NOTE:
1. THIS INFORMATION WAS GATHERED
FROM THE ASSESSOR PARCEL VIEWER ON
9-19-18.



SALT LAKE PUBLIC
HEALTH CENTER PARKING

2ND LEVEL SITE/PARKING

(ACROSS STREET)
- SEGO 3 FINE ART
- UNCA
- THE UTAH STATE BAR

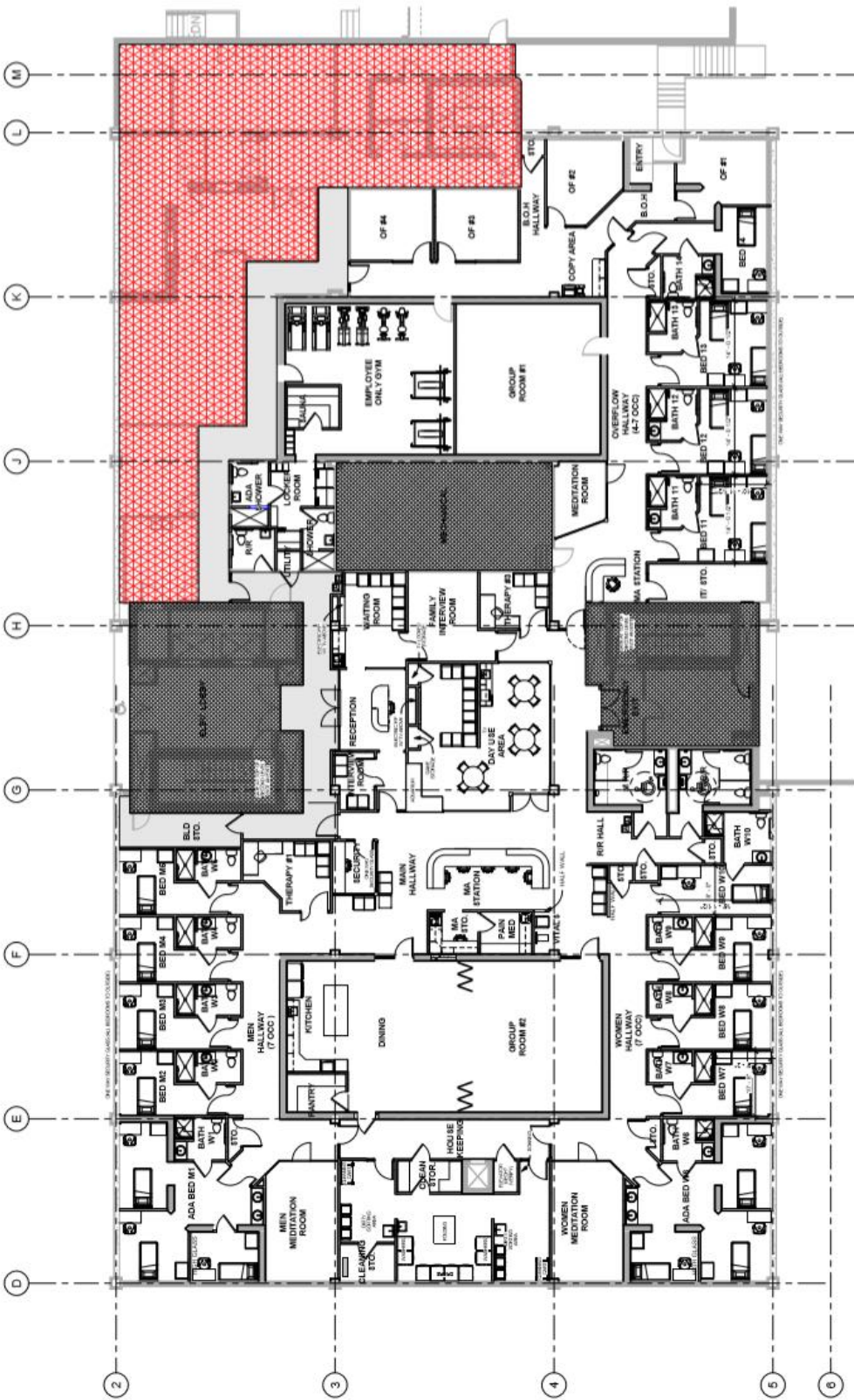
NOT FOR
CONSTRUCTION

Iridium AE

SACRED CIRCLE HEALTHCARE
PHASE IV
660 SOUTH 200 EAST SUITE 205
SALT LAKE CITY, UTAH

Doc. No. **AS-101** REV **0**

V. Elevation Drawing
a.



SACRED CIRCLE HEALTH CARE
1ST LEVEL DETOX CENTER
SCHEMATIC DESIGN E
(18-21 OCC)

*SECURE ALL RAISED FLOORS

- b. No construction plans or bids have been accepted but once they are we will submit the full construction material list and plans.
- c. Building Occupancy and floorplan
 - I. Occupancy restrictions for the floorplan is suggested at 42 which will not be exceeded.
 - II. Single occupancy room sizes
 - i. 1 room measuring 8' 8.5" (width) x 10' 8" (length)
 - ii. 4 rooms measuring 10' 9" (width) x 10' 8" (length)
 - iii. 3 rooms measuring 11' 4" (width) x 10' 8" (length)
 - iv. 6 rooms measuring 14' 3.5" (Length) x 12' 4" (width)
 - III. Double occupancy room size
 - i. 3 rooms measuring 14' 1.5" (width) x 19' 9" (length)



ATTACHMENT D: EXISTING CONDITIONS & ZONING ORDINANCE REQUIREMENTS

The subject property is located within the D-2 – Downtown Support zoning district. The purpose of the D-2 zoning district follows:

The purpose of the D-2 Downtown Support Commercial District is to provide an area that fosters the development of a sustainable urban neighborhood that accommodates commercial, office, residential and other uses that relate to and support the Central Business District. Development within the D-2 Downtown Support Commercial District is intended to be less intensive than that of the Central Business District, with high lot coverage and buildings placed close to the sidewalk. This district is appropriate in areas where supported by applicable master plans. Design standards are intended to promote pedestrian oriented development with a strong emphasis on a safe and attractive streetscape.

ADJACENT LAND USES and ZONING – see Area Zoning Map in [Attachment A](#) for more details.

The land uses and zoning surrounding the site include the following:

- **North:** D-2 – Downtown Support zoning district. The property to the north is zoned D-2 and has been developed for the Salt Lake County Health Department’s Public Health Center
- **South:** D-2 – Downtown Support zoning district. The properties to the south of 700 S are zoned D-2 and have been developed for the Department of Workforce Services offices and miscellaneous office and professional uses.
- **East:** D-3 – Downtown Warehouse/Residential district, RO – Residential/Office district and RMF-75 – High-Density Multi-family Residential district. The properties on the east side of 200 E include the zoning districts noted above and have been developed for a variety of professional, office and multi-family uses.
- **West:** D-2 – Downtown Support zoning district. The property to the west is zoned D-2 and has been developed for the Geraldine E. King Women’s Resource Center.

The proposed use will be within an existing building located on the north-west corner of 700 S and 200 E. The building itself is situated on a 2.75-acre site that consists of the office building and attached parking garage. The proposed use will be located on first floor of the building which has a separate parking and building entrance from the parking structure into the building.

The total area of the building that will be occupied by the proposed use is approximately 17,302 square feet. This includes both the facility space for clients and administrative office and staff spaces. The parking garage includes 40 spaces on the first floor dedicated to the proposed use. These spaces can be accessed by employees or clients as needed.

APPLICABLE MASTER PLAN POLICIES

Downtown Community Plan (2016)

The subject property is included in the South State area identified in the Downtown Plan. The Plan includes a variety of challenges, initiatives and goals related to housing and support services that support the proposed location and function of this facility. Specifically, the following statements are found in the Downtown Plan:

- **Challenges – Homelessness Persists** – The Plan recognizes that homelessness and the issues associated with it including crime and drugs impact downtown’s livability. This facility is specifically aimed at treating drug addiction which often goes hand-in-hand with homelessness and other issues. The purpose of the facility is to “break the cycle” so it is specifically addressing a challenge identified in the Plan.
- **Fosters Equity & Opportunity** – The Plan includes a Goal of providing open and convenient access to services and amenities for residents, visitors and workers. This includes access to social and family services which includes health initiatives such as the proposed facility.
- **Is Prosperous** – The Plan includes a goal to elevate the quality of life for downtown residents and workers. This includes encouraging medical services downtown and addressing the issues associated with homelessness.

Plan Salt Lake (2015)

Plan Salt Lake was adopted in 2015 as the citywide vision for Salt Lake City for the next 25 years. The Plan contains Guiding Principles that relate to the proposed use including the following:

- 1) Neighborhoods that provide a safe environment, opportunities for social interaction, and services needed for the wellbeing of the community therein.
- 11) Ensure access to all City amenities for all citizens while treating everyone equitably with fairness, justice and respect.

The proposed use would provide services to the community in the form of opioid treatment. This also relates to the principles of fairness, justice and respect. The proposed use is in concert with the principles and strategies identified in Plan Salt Lake.

Growing SLC: A Five Year Housing Plan – 2018-2022 (2017)

Growing SLC: A Five Year Housing Plan – 2018-2022 (aka – the Salt Lake City Housing Plan) was adopted in late 2017 as the City’s first housing plan since 2000. The Housing Plan is intended to advance the vision that Salt Lake City is a place for a growing diverse population to find housing opportunities that are safe, secure, and enrich lives and communities.

The plan does not address support services directly. However, a focus of the Plan is the protection and development of affordable housing opportunities throughout the City as identified in Goal 2: Affordable Housing. The plan describes the linkages and interaction between a lack of affordable housing and very low income renters and the City’s most vulnerable citizens. This lack of affordable housing can push some citizens into homelessness as they are priced out of the market.

The Housing Plan was developed using existing housing policy, primarily Plan Salt Lake and the Salt Lake City Comprehensive Housing Policy. The guiding principles of Plan Salt Lake are incorporated by reference including the initiative to “Support homeless services”. As noted in the analysis of the Downtown Plan, the goal of this facility is to address the generally accepted connection between drug use and homelessness. The proposed use is in concert with the principles and strategies identified in the Salt Lake City Housing Plan.

SALT LAKE CITY ZONING ORDINANCE PROVISIONS

Current Zoning Requirements – Chapter 21A.30.030: D-2 Downtown Support District

Zoning Standard	Regulation Requirements and Proposed	Status
Maximum Building Height	Maximum – 65 feet	Complies
Yard Requirements	None required	Complies
Parking Spaces	Parking requirements for a group home are 2 parking spaces per home and 1 parking space for every two (2) support staff present during the busiest shift. For this use, fifteen (15) parking spaces would be required. The existing parking structure includes 409 parking spaces. There are approximately 144 parking spaces on the first level, forty (40) of which are available for the proposed use.	Complies

ATTACHMENT E: ANALYSIS OF STANDARDS – CONDITIONAL USE

21A.54.080 Standards for Conditional Use

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

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

Analysis: The property is located in the D-2 (Downtown Support) zoning district. A Large Group Home is allowed as a Conditional Use in the D-2 zoning district. The proposed use complies with all provisions of the Zoning Ordinance.

Finding: The proposal complies with the applicable provisions of the Salt Lake City Zoning Ordinance. The use is complimentary to many of the social services in the area.

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

Analysis: The proposed use is located within an existing building and will be in close proximity to a variety of other social and government services and facilities. There are also a number of small professional offices in the area. The proposed use is similar to the intensity and impact of other existing uses in the area so would not be out of character or incompatible with the surrounding area or uses.

Finding: Staff finds that the use and the scale and intensity of development will be compatible with surrounding uses.

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

Analysis: The Central Community Master Plan recognizes that the area in which the property is located functions in a downtown support capacity role. The Future Land Use Map in the Plan recognizes that those downtown support uses are expected to continue in the future. The proposed use also provides services that address the well-being of the community and adheres to the principles of fairness, justice and respect as addressed in Plan Salt Lake.

Finding: The proposed use is in concert with adopted city planning policies, documents and plans.

4. The anticipated detrimental effects of a proposed use can be mitigated by the imposition of reasonable conditions (please refer to Detrimental Impacts Chart on the following page for details).

21a.54.080B Detrimental Effects Determination

In analyzing the anticipated detrimental effects of a proposed use, the planning commission shall determine compliance with each of the following:

Criteria	Finding	Rationale
1. This title specifically authorizes the use where it is located	Complies	The proposed facility is defined as a “Dwelling – Large Group Home” which is allowed in the D-2 zoning district as a Conditional Use.
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 Downtown Plan recognizes the area in which the property is located as continuing to grow and develop. Based on proximity to the downtown business district, many of these functions will be a downtown support capacity. The proposed use is in concert with the Downtown Plan and the anticipated character of the area over time.
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	The proposed use is located within an area that contains a variety of government and social services and a variety of office and multi-family residential uses. The proposed use is similar to other existing uses in the area in terms of intensity and scale and would not be out of character with surrounding uses and development.
4. The mass, scale, style, design, and architectural detailing of the surrounding structures as they relate to the proposed have been considered	Complies	The building is existing and is compatible with the existing development in the area in terms of mass and scale.
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 existing parking garage for the building has entrances to the building from both 200 E and 700 S. These are not being changed under this proposal. The access points will not impede traffic flows.
6. The internal circulation system is designed to mitigate adverse impacts on adjacent property from motorized, non-motorized, and pedestrian traffic	Complies	The internal circulation system is an existing condition and considers building placement and on-site needs for the movement of equipment and materials. It complies with this standard.
7. The site is designed to enable access and circulation for pedestrian and bicycles	Complies	The site is accessible by pedestrians and bicycles from two major streets.
8. Access to the site does not unreasonably impact the service level of any abutting or adjacent street	Complies	The proposed use will be contained within an existing building. No impacts to the service levels on 200 E or 700 S are anticipated from the proposed use.
9. The location and design of off-street parking complies with applicable standards of this code	Complies	Parking will be provided within an existing parking structure on the site. The structure complies with code requirements.
10. Utility capacity is sufficient to support the use at normal service levels	Complies	The site has sufficient utility capacity to support the use.
11. The use is appropriately screened, buffered, or separated from adjoining dissimilar uses to mitigate potential use conflicts	Complies	Landscape will be reviewed during the building permit review stage to ensure compliance with ordinance standards.

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	There is no indication that the proposed project will introduce any environmental damage to the surrounding area.
13. The hours of operation and delivery of the use are compatible with surrounding uses	Complies	The hours of operation for the proposed use are 24 hours a day, 7 days a week, 365 days a year. As a residential use, this is not out of character with other uses in the area.
14. Signs and lighting are compatible with, and do not negatively impact surrounding uses	Complies	Existing signs and lighting conform with zoning standards.
15. The proposed use does not undermine preservation of historic resources and structures	Complies	There are no historic resources or structures on this site.

Finding: In analyzing the anticipated detrimental effects of the proposed use, Planning Staff finds that the request complies with the criteria listed above.

ATTACHMENT F: PUBLIC PROCESS AND COMMENTS

Public Notice, Meetings, Comments

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

- Notice of the project and request for comments sent to the Chairs of the Central City, Ball Park and Downtown Community Councils on November 6, 2019
- Staff sent an early notification announcement of the project to all residents and property owners located within 300 feet of the project site on November 7, 2019 providing notice about the project and information on how to give public input on the project.
- Staff held an Open House for the project at the Salt Lake City Downtown Public Library to solicit comments on November 21, 2019. No comments were submitted in relation to the proposal.
- The 45-day recognized organization comment period expired on December 30, 2019.
- To date, only one comment opposed to the use was relayed to staff. A summary of that comment is included below.

Notice of the public hearing for the proposal included:

- Public hearing notice mailed on: January 31, 2020
- Public hearing notice sign posted on property: January 31, 2020
- Public notice posted on City and State websites and Planning Division list serve: January 31, 2020

Public Input:

The following comment/concern was provided to staff via phone by Kathy Wilson, an owner in Sego 3 Fine Art, a business located at 661 South 200 East, directly across 200 E from the existing building:

General concern about businesses and business owners being pushed out or negatively impacted through the concentration of homeless persons and transients in the downtown area. These services should not be concentrated in a downtown area and would be better spread out. General concerns about parks in the area becoming gathering spots for homeless persons.

Staff's Response: The City recognizes that the proposed use is allowed in the zoning district through the conditional use process. The general area has several social service providers and facilities present including those related to health, employment and homeless resources. The concerns about homeless and transient persons in the area are not related to the proposed use and outside of the scope of this application. The Salt Lake City Police Department and individual providers have operational plans and monitor area activities to address issues that arise in relation to City codes and ordinances.

To date, no additional public comments have been received by staff.

ATTACHMENT G: DEPARTMENT REVIEW COMMENTS

The following comments from other reviewing departments were submitted in relation to the proposal:

PUBLIC UTILITIES COMMENTS

No comments provided.

ENGINEERING COMMENTS

No objections to the proposed conditional use.

TRANSPORTATION COMMENTS

No issues from Transportation. There is no increase in parking for a change of use in the downtown districts.

ZONING REVIEW COMMENTS

Building Services finds no zoning related issues associated with this proposal. Future comments may be associated with the building permit during the time of its review.

FIRE REVIEW COMMENTS

- Buildings with I Occupancies (Detoxification Centers) shall provide fire sprinklers throughout the building. Notification alarms and smoke detection shall be required per IFC 907.2.6.2
- Fire Department Connections shall be located on the street address side of the building and have a fire hydrant located within 100-lineal feet.
- Fire hydrants shall extend to within 400-feet of all first-floor exterior portions of the building.
- Additional comments could be posted at permit submittal