



Staff Report

PLANNING DIVISION

DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: Salt Lake City Planning Commission
From: David J. Gellner, AICP, Senior Planner – 801-535-6107 - david.gellner@slcgov.com
Date: May 11, 2022
Re: PLNPCM2022-00019

Conditional Use

PROPERTY ADDRESS: 1875 S. Redwood Road
PARCEL ID: 15-15-400-051-0000
MASTER PLAN: Westside Master Plan
ZONING DISTRICT: CC – Corridor Commercial

REQUEST:

Volunteers of America (VOA) is requesting Conditional Use approval for a new clinical detoxification/recovery facility to be established in an existing office building located at 1875 S Redwood Road in the CC – Corridor Commercial zoning district. The use is classified as a Dwelling - Large Group Home and is allowed as a Conditional Use in the CC zoning district.

RECOMMENDATION:

Based on the information and findings listed in the staff report, it is the Planning Staff's opinion that the request generally meets the applicable standards of approval and therefore recommends the Planning Commission approve the request with the following conditions:

1. Compliance with all other City Department Conditions & Requirements
2. Adoption of and adherence to the procedures and principles outlined in the Management, Security and Operations Plan included in the narrative submitted by the VOA as part of this application.

ATTACHMENTS:

- A. [Vicinity Map](#)
- B. [Plan Set](#)
- C. [Property and Vicinity Photos](#)
- D. [CC Zoning Standards](#)
- E. [Conditional Use Standards](#)
- F. [Public Process & Comments](#)
- G. [Department Review Comments](#)

PROJECT DESCRIPTION



Quick Facts

Existing building located at 1875 S. Redwood Road. Built in 1984 and used as an office building for Zions Bank. Exterior of building not being altered. Conversion of first floor to living space for detoxification use.

Height: Approximately 35 feet – 2 stories

Floor Space: Approx. 76,000 SF total/ 38,000 SF per floor

Exterior Materials: Brick

Parking: Approximately 280 existing surface stalls

Review Process & Standards: Conditional Use and general zoning standards.

The proposed use is a clinical detoxification/recovery facility which will be located on the first floor of an existing office building located at 1875 S Redwood Road. The use is classified as a Dwelling - Large Group Home which is allowed as a Conditional Use in the CC zoning district. The definition of Dwelling – Group Home (Large) is included in [Attachment D](#) of this report. The proposed use will consist of a dorm style in-patient facility with 24-hour supervision, a commercial kitchen providing meals for clients, and counseling and medical services provided for up to 165 individuals staying at the facility. The use will be located on the first floor of the building and occupy about 30,000 square feet, or approximately 80% of the first floor area of the building. The remainder of the building will be used for the offices of the VOA organization.

The existing 2-story building has a brick exterior and approximately 76,000 square feet of total floor area. Architectural styles in the area vary, but lower height commercial and warehouse forms tend to be the dominant architectural style as would normally be anticipated along a commercial corridor. The parking lot has approximately 280 parking spaces available for the uses proposed on the site. The existing parking areas are located to the north, east and west of the building, with the building set back from While the interior of the building will be remodeled substantially to accommodate the proposed uses, no major changes are proposed to the building's exterior, parking or landscaping. Changes to the building's exterior will be confined to those necessary to comply with the Building Code requirements associated with a change of use.

The existing building is located along Redwood Road, a major north-south State arterial highway. Zoning along Redwood is predominately commercial on the east side with heavier industrial and commercial uses concentrated on the west side of Redwood Road. The uses in the area commonly include offices and regional commercial uses such as industrial sales and sign manufacturing. The subject property is in a commercial area with a variety of uses present including automotive repair and parts, a motel, office uses, warehouses and restaurants. The east side of the site borders the Glendale Golf Course which is zoned Open Space. There is no neighboring residential zoning or developments in the area. The nearest residential development is on the north side of 1700 S, approximately ¼ of a mile to the north-east. There are no neighboring land uses that should be in conflict with the proposed use.

There is existing bus service along Redwood with a dedicated bus stop near the northern boundary of the property. The bus stop is located approximately 200 feet from the building, providing convenient access for employees and visitors to the facility.

APPROVAL PROCESS AND COMMISSION AUTHORITY

The Planning Commission has final approval authority for a Conditional Use application. According to Chapter 21A.54.080.C, the Planning Commission may impose conditions related to the standards and detrimental impacts if a condition is necessary for compliance with the standards of approval or any applicable zoning regulation and to reduce any reasonably anticipated detrimental impact. Conditions may be related to:

1. Conditions on the scope of the use; its character, location, hours and methods of operation, architecture, signage, construction, landscaping, access, loading and parking, sanitation, drainage and utilities, fencing and screening, and setbacks; and
2. Conditions needed to mitigate any natural hazards; assure public safety; address environmental impacts; and mitigate dust, fumes, smoke, odor, noise, vibrations; chemicals, toxins, pathogens, gases, heat, light, and radiation.

After a public hearing is held, planning staff can help the commission identify and determine if information provided warrants further discussion on any potential non-compliance or detrimental impact that may require a condition of approval.

KEY CONSIDERATIONS

The key considerations listed below were identified through the analysis of the project:

1. Compliance with City Goals, Policies & Plans
2. Neighborhood Compatibility & Anticipated Impacts
3. Public Input and Concerns

Consideration 1: Compliance with City Goals, Policies and Plans

The Westside Master Plan (2014)

The subject property and surrounding area are discussed in the Westside Master Plan. The property is located about halfway in between future Regional Nodes identified along Redwood at both 1700 S and 2100 S so the generalized discussion about changes along Redwood Road has the most relevance. The Plan recognizes that a desired change along the Redwood Corridor

includes a transition from the existing industrial uses to include more options for housing density, commercial options and office uses. There is also discussion about the need for additional health and related services on the west side and that Redwood Road could be a location that accommodates these needs.

The proposed use would continue to provide office space along Redwood while also increasing the number of persons that use this area of Redwood. This would increase traffic to existing businesses along that corridor. The use would also provide health services which have been indicated as lacking on the west side. The proposed use is in concert with the principles identified in The Westside Master Plan.

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.

Consideration 2: Neighborhood Compatibility & Anticipated Impacts

The proposed use will be located in an existing building located along Redwood Road, a major State arterial road. Zoning to the north and south is also CC – Corridor Commercial and the properties have been developed for commercial uses including an office buildings a restaurant. To the east, the property is zoned as Open Space and has been developed as the Glendale Golf Course. Across Redwood to the west, the properties have been developed for commercial uses that transition to more industrial uses. There are no neighboring residentially zoned areas or uses that would potentially be impacted by the use. In addition, the proposed Security, Management and Operations Plan ([see Attachment B](#)) will serve to address and mitigate any potential impacts on neighboring properties. 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 3: Public Input and Concerns

Staff received one email and one letter in opposition to the proposed use. A copy of that letter and a copy of the email are included in [Attachment F](#) of this report. The letter from Armstrong Teasdale dated March 8, 2022 raised a number of objections to the proposed use that are outlined below. In response to this letter, the VOA submitted a revised narrative on April 14, 2022 that addresses these concerns and outlines mitigation strategies ([see Attachment B](#)). The VOA also submitted a response letter that is included in [Attachment F](#).

The proposed use is not a Homeless Resource Center or Shelter as defined in City code. Those uses have a specific requirement of a Security & Operations Plan (SOP) that must be submitted, approved by the City and SLCPD and recorded against the property. This is not a requirement for a Group Home. However, the VOA followed the basic outline of the security plan required for a proposed Homeless Shelter and incorporated these elements into their own operations and management plan. The revised narrative includes details of their security and operations plan and addresses the following identified issues in the manner described below:

1. Impacts from cigarette smoke on surrounding properties.

The VOA has proposed to limit cigarette smoking to two (2) defined outdoor areas. These areas will be on the east and west sides of the building respectively. The areas will be fenced in and smoking will not be allowed in other areas. The letter of opposition requested the smoking areas be moved inside. State Law prohibits smoking indoors. Both alcohol related uses and homeless shelters allow for smoking areas outdoors. Given the site configuration and location of the existing building, the smoking areas will not be near adjacent buildings and will be at least 50 feet away from the property lines. This distance combined with smoking only being allowed in designated areas is a reasonable mitigation measure that reasonably addresses the concern of smoke impacting neighboring properties.

2. Issues of loitering on the site.

The SOP submitted by the VOA indicates that the program will be self-contained within the building and that security procedures will be implemented that require clients to have staff approval and supervision to leave the building. Clients will be monitored at all times while on site and will not be allowed to loiter outside of the building. The issue of loitering is addressed by the SOP.

3. An insufficient community relations program.

The SOP outlines the plan for a quarterly meeting of a “Neighborhood Coordinating Council” to be organized by VOA management. The Council has a diverse representation to be included on that body as outlined in the SOP. The Glendale Community Council will also be invited to all meetings as will the SLCPD Community Liaison Officer for the area. The intent is to go over all complaints and concerns so that they can be addressed by VOA management. In addition, there will be a response system including a 24-hour phone line and staff will be present at all times in the building and able to respond and log the issues. Finally, the VOA has a designated Business and Community Liaison to respond to complaints in the surrounding area. The issue of a community relations program has been addressed by the SOP.

4. Utility capacity issues for the site.

Salt Lake City Public Utilities reviewed the request and their comments are included in Attachment G of this report. The site is fully serviced by utilities and sewer. SLCPU indicated that some upgrades to the sewer system may be required for the commercial kitchen and for stormwater controls. This would also be the case if a new restaurant were to be developed at this location, a permitted use. The issues of sewer capacity and any required upgrades will be addressed at the Building Permit stage of development.

5. Similar operations at other VOA sites.

The proposed use is not common or prevalent in the immediate vicinity in terms of establishing a baseline for anticipated impacts from similar uses. The “track record” of other VOA facilities that the provided letter outlines however is useful in addressing some of the aspects of Conditional Use Standard A.2 which deals with compatibility with surrounding uses. The proposed SOP is intended to mitigate the identified concerns. This is also elaborated upon in the applicant’s narrative and is addressed in Items 2 & 3 above in regard to the SOP and community relations programs.

Staff finds that the identified concerns identified by the public have been addressed by the Management, Security and Operations Plan submitted by the VOA as part of their narrative and that the processes, procedures and other aspects of that plan would reasonably mitigate the anticipated detrimental effects introduced by the proposed use.

STAFF RECOMMENDATION & SUMMARY

The applicant is proposing a use that is allowed as a conditional use in the zoning district and that is in concert with the established nature of the area. Furthermore, the applicant has proposed measures and an operations plan that will mitigate reasonably anticipated detrimental impacts from the proposed use. 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

Approval of the Request

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.

Denial of the Request

If the Conditional Use application is denied, the applicant will not be able to establish the desired use on the property. However, all other uses allowed in the zone, whether conditional or permitted could be established on the property subject to the applicable review process. A revised proposal for a substantially similar use could also be proposed for consideration on the property.

Appeals Process

Any person adversely affected by a final decision of the Planning Commission on an application for a conditional use may appeal to the Appeals Hearing Officer as outlined in the Zoning Ordinance.

Modifications to an Approved Conditional Use

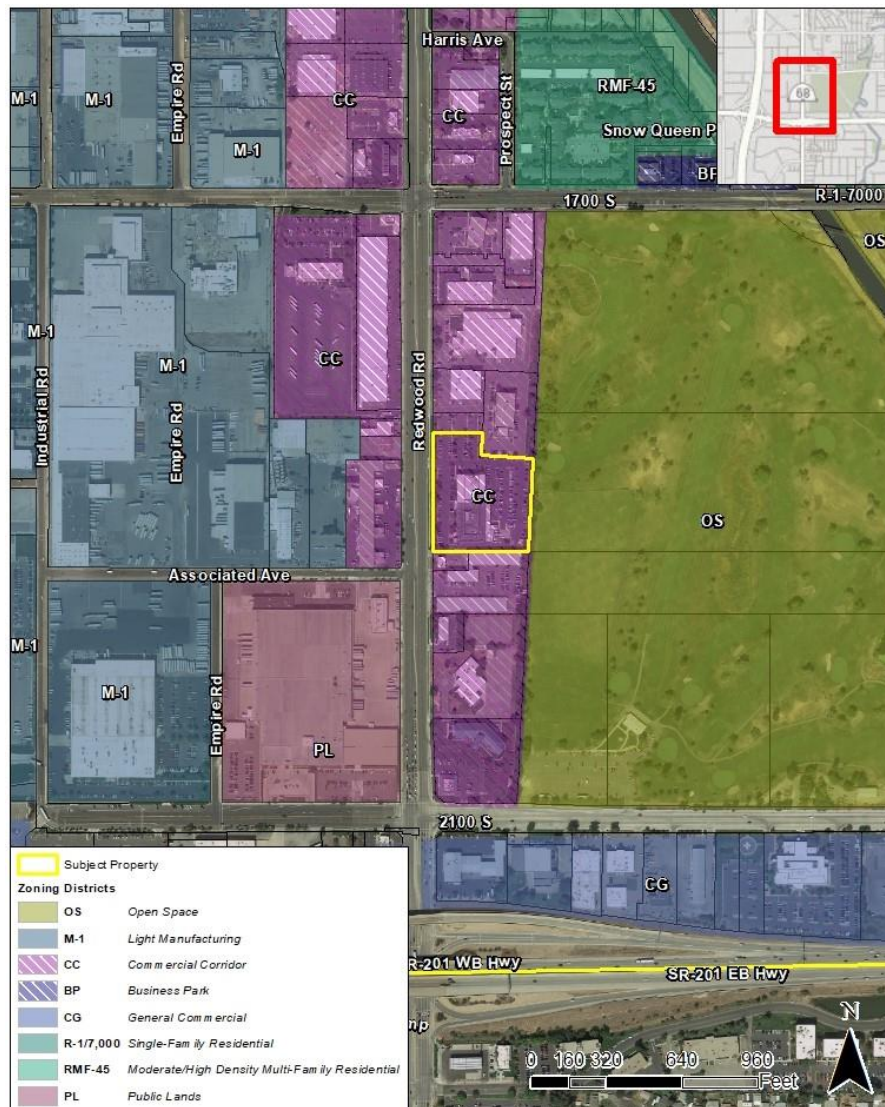
Modifications to an approved Conditional Use may be classified in two different ways as outlined below:

1. Administrative Review: An alteration or modification to a structure with a conditional use that increases the floor area by less than twenty five percent (25%) of the gross floor area or one

thousand (1,000) gross square feet, whichever is less, may be approved by the planning director without a public hearing.

2. An alteration or modification to a structure with a conditional use that increases the floor area by more than twenty five percent (25%) of the gross floor area or one thousand (1,000) gross square feet, whichever is less, shall be reviewed as a new conditional use pursuant to the requirements and standards of this chapter.

ATTACHMENT A: Vicinity Map



ATTACHMENT B: Narrative & Plan Set

SALT LAKE CITY CONDITIONAL USE PERMIT APPLICATION

(Updated Version: 04-14-2022 – includes Management, Security & Operations Plan)



Property Address: 1875 South Redwood Road, Salt Lake City, Utah

Parcel Id. Number: 15-154-000-051

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1. Project Description

Volunteers of America, Utah (“VOA”) has been providing social model detoxification and withdrawal management services for over 35 years in Salt Lake City. Annually VOA provides hundreds of individuals with a safe and supportive trauma-informed environment as they withdraw from alcohol and/or drugs and address substance use and addiction issues. As clients start to physically stabilize and recover, accessing case management services to gain linkage to behavioral health and medicated assisted treatment services is critical. We are proud and grateful for our community partnerships and the service coordination in Salt Lake County that make it possible to connect clients to these resources and create pathways to healing and recovery.

VOA recently purchased property located at 1875 South Redwood Road, Salt Lake City, UT 84104, Tax Parcel No. 15-154-000-051 (the “*Property*”) from Zions Bank Corporation. The Property is located in the Commercial Corridor (“CC”) zoning district. Zions Bank will continue to operate their existing business out of the building located on the Property (the “*Building*”) until Summer or Fall of 2022, at which time VOA will begin renovating the building in preparation of relocating VOA’s administrative offices, prevention and counseling services, and social model detoxification and withdrawal management programs to the Building.

VOA is submitting this application (the “*Application*”) to request Conditional Use approval for a Clinically Monitored Social Model Detoxification and Withdrawal Management Program (the “*Program*”) that will operate out of the majority of the first floor of the Building. Social Model Detoxification refers to the primary phase of drug and alcohol withdrawal, in which the process of withdrawal from the relevant substance(s) is monitored, supervised, and managed. The services VOA would provide include 24-hour staff monitoring, targeting the management of acute intoxication, and aiding Program clients (“*Clients*”) to withdraw from alcohol and or drugs. Clients who qualify for medication-assisted treatment, other medical services, or additional behavioral health services can access those services through VOA programs or in coordination with partner agencies. As Clients start to physically feel better, they can meet with a case manager and/or peer support specialist to connect with substance use treatment programs and plan their next steps. The clients will be monitored by experienced and well-trained staff. VOA provides non-medical, around-the-clock detoxification services in a clean and supportive environment.

2. Conditional Use Information

If applicable, what are the anticipated operating/delivery hours associated with the proposed use?

- a. The Program will be licensed by the State of Utah and will provide services for approximately 165 individuals 24 hours a day, 7 days a week. Clients will be able to stay in the Program between 14 to 30 days. Once admitted into the Program, clients are not able to leave the Building during their stay unless on an approved pass. Clients can decide to discharge at any time. Transportation to local Treatment Centers and Homeless Resource Centers will be provided for those who would like to access those services.

- b. The Program will be located on the first floor of the Building, which will be about 30,5000 square feet or 80% of the first floor. We are planning to have dorm sleeping areas that accommodate 165 beds, restrooms, a commercial kitchen, group rooms, staff offices and an intake area.

What are the land uses adjacent to the property (abutting and across-the-street properties)?

Adjacent to the west of 1875 S Redwood Road is the Glendale Golf course which is in the Open Space zoning district. Across the street are businesses in the CC zone. A food establishment is located to the South and an office building to the North. More information concerning the uses of the adjacent properties and the Program's compatibility with the same are found on pg. 6 of this Application.

How many employees are expected to work on-site during the highest shift?

Our highest shift will be from 8:00 am to 4:30 pm. Staff during this shift will include recovery assistants, intake workers, case managers, food service, facility staff, transportation staff, as well as supervisors. We estimate 20 -25 staff members.

If applicable, how many seats will be provided as part of the conditional use?

Not applicable.

Have you discussed the project with nearby property owners? If so, what responses have you received?

In November 2021, VOA reached out to the chair of the Glendale Neighborhood Council to set up a meeting with their board and community members. VOA's CEO and Vice President of Program Operations participated in an online forum with Glendale community members to explain the planned use for the facility and answer questions from community members on December 9th, 2021. We are also planning to do outreach to the businesses in the surrounding area in January 2022. We plan to have an agency representative attend the monthly Glendale Neighborhood Council meetings to be available to talk about the project and to receive questions and concerns.

3. Minimum Plan Requirements. See Exhibit B.

4. Site Plan. See Exhibit B.

[Standards for Conditional Uses on Following Pages]

21A.54.080: STANDARDS FOR CONDITIONAL USES

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

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

The Property is zoned as Corridor Commercial (“CC”). Pursuant to the table included in Section 21A.33.030 of the Salt Lake City Code (the “Code”), a “Dwelling: Group home (large)” is a use that is conditionally permitted in the CC zone.

Under Section 21A.62.040 of the Code, a “Dwelling: Group home (large)” is defined as follows:

DWELLING, GROUP HOME (LARGE): A residential treatment facility, occupied by seven (7) or more individuals, licensed by the State of Utah under title 62A, chapter 2 of the Utah Code or its successor that provides a twenty four (24) hour group living environment for individuals unrelated to the owner or provider that offers room or board and specialized treatment, behavior modification, rehabilitation, discipline, emotional growth, or habilitation services for persons with emotional, psychological, developmental, or behavioral dysfunctions, impairments, or chemical dependencies. A group home dwelling includes a recovery residence but does not include a boarding school or foster home as defined in title 62A, chapter 2 of the Utah Code or its successor, or a residential support dwelling as defined in this chapter.

The Program meets the Code’s definition of a “Dwelling: Group home (large).” The Program (i) will be a residential treatment facility that will be occupied by more than seven individuals, (ii) will be licensed by the State of Utah under Title 62A, Chapter 2 of the Utah Code, and (iii) will provide a 24-hour group living environment for people detoxing or withdrawing from various substances/chemical dependencies.

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

Using the Property for the Program (the “*Requested Use*”) is compatible with the uses of the surrounding properties. Adjacent parcels to the North and South of the Property are zoned as CC and include an office building, warehouse and food establishment; adjacent parcels to the East of the Property are used for a golf course and zoned as Open Space; and adjacent property to the West of the Property (on the other side of Redwood Road) is also zoned as CC. There are no residential homes or neighborhoods in or near the vicinity of the Property, and the commercial businesses that surround the Property to the North and East (the “*Neighboring Commercial Businesses*”) are not customer-facing or retail businesses.

The Program will be completely self-contained inside the Building, Clients will be monitored on a 24-7 basis by the Program Staff (“*Staff*”), and security procedures will be

implemented to ensure that the Program Clients do not leave the Building without proper supervision or staff approval. Clients will not be allowed to loiter outside the Building. From the exterior, the Building and the Program will look like and operate in a manner similar to the Neighboring Commercial Businesses on Redwood Road.

The Requested Use will also not impede local traffic flow. There is more than adequate parking behind and in front of the Building for Staff, and the persons dropping off or picking up Clients. Clients will stay in the Program for 14 to 30 days; consequently, there will not be a significant amount of daily vehicle activity relating to Client arrivals and departures. The current facility operated by VOA has an average of just 10 admissions (drop offs) per day.

Finally, the Property is separated from the golf course to the East of the Property by a fence and a line of trees that block the Property and Building from view. The majority of the adjacent portion of the golf course is the far end of a driving range that may not be physically occupied by many golf course patrons.

To ensure continuing compatibility with the surrounding community, VOA will have a dedicated 24-hour response system (email and phone number) that will be available for the community. Staff will be present at the Building 24/7 to respond to emails and phone calls. A log will be kept which will include any complaints and VOA's response to the same. We also have a designated Business and Community Liaison for the area surrounding 1875 S. Redwood Road.

VOA will have a publicly advertised quarterly meeting with the Neighborhood Coordinating Council which will be organized by members of the VOA management staff. Meetings will be advertised within the detoxification program, an invite will be sent to the Glendale Neighborhood Council and operator's website and a sign posted on the public street at least ten (10) days in advance. Representatives from each of the following shall be included in the Neighborhood- Coordinating Council:

- i. A representative from the Detoxification program;
- ii. a business located within ¼ mile of the site;
- iii. a resident who lives within ¼ mile of the site;
- iv. a school, if any, within ¼ mile of the site;
- v. chair of the community council (or designee) whose boundary encompasses the site;
- vi. an individual who has previously received or is currently receiving services from the detoxification program; and
- vii. a representative from VOA.

The SLCPD Division Community Liaison Officer will also be invited to all meetings. VOA will go over complaints and concerns quarterly during each Neighborhood Coordinating Council.

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

The Salt Lake City Master Plan

First, the Salt Lake City Master Plan (the “*Salt Lake MP*”) includes the charge to provide “services needed for the wellbeing of the community.” *See* Salt Lake MP at pg. 17. By allowing VOA to operate the Program on the Property, Salt Lake City (“*SLC*”) will be providing its residents with a badly needed and fundamental resource for those persons recovering from substance abuse addictions. If SLC residents have access to a safe and secure place to detox from harmful and addictive substances, then the mental, physical, and emotional wellbeing of those residents (and the SLC population as a whole) is likely to increase.

Second, the Salt Lake MP encourages initiatives that support “safe neighborhoods” and a “reduction in crime.” *See* Salt Lake MP at pg. 17. If the Program is permitted to operate on the Property, then a likely result will be a reduction of crime throughout SLC. Many crimes in SLC are substance abuse/addiction related crimes. Consequently, if more SLC residents can successfully detox/withdraw from harmful and addictive substances, the likely result will be less crime in the community.

Third, the Salt Lake MP includes an initiative to “provide access to opportunities for a healthy lifestyle.” *See* Salt Lake MP at pg. 19. The Program will provide SLC residents with a place and an opportunity to detox from addictive substances, which will likely result in a healthier lifestyle for those residents.

Fourth, the Salt Lake MP includes an initiative to “support west side business nodes.” *See* Salt Lake MP at pg. 17. The Property is located on the west side of SLC and will provide job opportunities to dozens of persons (including addiction specialists, security personnel, administrators, building maintenance personnel, etc.). If the Requested Use is approved, the persons working at the Program will be frequenting the west side of SLC, which will have a corollary effect of improving the neighboring economy (because such Program employees will be more likely to live, shop, and frequent the west side of SLC).

Finally, the Salt Lake MP calls for SLC to “recognize and advocate for the rights of all residents and visitors.” *See* Salt Lake MP at pg. 37. By supporting the operation of the Program on the Property, SLC will be advocating for the right and opportunity for persons to recover from their addictions and become happier, healthier, and more productive members of the community.

The Westside Master Plan

The Westside Master Plan (“*WMP*”) indicates that residents want Redwood Road to transition from an area that has largely been dedicated to heavy industrial uses to an area that supports “more commercial options” and “office buildings” amongst other goals. *See* WMP at pg. 52 and 53. The Program will be run as an office building and will not involve any industrial uses or have an industrial appearance. The Program will also have the benefit of increasing the number of persons that frequent Redwood Road, which will in turn help support retail businesses in the Redwood Road area.

4. The anticipated detrimental effects of a proposed use can be mitigated by the imposition of reasonable conditions.

Detrimental Effects Analysis

1. This title specifically authorizes the use where it is located;

Yes. See answer to 21A.54.080(A)(1) above.

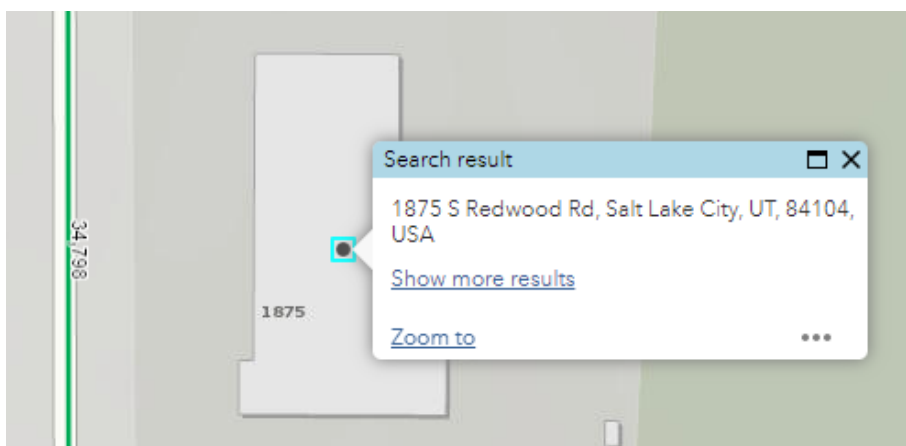
2. The use is consistent with applicable policies set forth in adopted citywide, community, and small area master plans and future land use maps.

Yes. See answer to 21A.54.080(A)(3) above.

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.

Yes. See answer to 21A.54.080(A)(2) above. Additionally, see the bulleted information below:

- VOA will maintain a secure location and all Program Clients will be monitored by staff on a 24/7 basis. Program Clients remain inside during both day and night unless on an approved pass, discharging or entering for admission.
- Visitors are limited and monitored inside the facility.
- There will be a commercial kitchen in our facility that will serve 3 meals a day to Program Clients, eliminating any need for travel outside the facility. There are no walk-in meals provided.
- Redwood Road is a major north/south artery with 2019 Average Daily Traffic measured at 34,798. This facility will not have a material impact on this traffic.



VOA will also institute specific policies that discourage and minimize any loitering on the Property. First, any service providers already working with a Program Client will visit the

Client during normal office hours or speak to the Client over the phone. In the event a service Provider meets with a Client in person, such meetings will be conducted in an office in the Building.

Second, a Client's family members will only be allowed to visit the Client (a "*Family Visit*") if the Family Visit has been previously scheduled and approved by the Program Staff. All Family Visits will be staff supervised, only allowed during normal business hours, and only occur inside the Building.

Third, for Clients that are taking public transportation, walking or getting dropped off to receive services, the expansion of detoxification beds will aid in decreasing or eliminating any loitering around the Building. The entrance for the Men's detoxification program will not be street-facing and will be on the east side of the Building where there is a covered entrance area. We are planning additional intake rooms and staff to make the intake process seamless and efficient so we can move clients quickly into the facility.

Finally, VOA will have transportation support for Clients who are discharging from the Program and a bus stop is located right on Redwood Road by our building. We will have cameras installed inside and outside of the Building for increased security. Staff will actively monitor the cameras for activity outside. Staff will also be doing hourly rounds and will check in with anyone around the building to move them quickly into the Program or on to their next destination. Staff will also follow any safety and emergency procedures if necessary, which will include but not limited to calling emergency services or law enforcement if deemed necessary.

4. The mass, scale, style, design, and architectural detailing of the surrounding structures as they relate to the proposed have been considered.

Property and structure are existing. Architectural modifications will be primarily interior and completed according to code. Exterior modifications may occur to accommodate code requirements associated with the change of use.

5. Access points and driveways are designed to minimize grading of the natural topography, direct vehicular traffic onto major streets, and not impede traffic flows.

Property and access are existing. See aerial site plan – Exhibit A.

6. The internal circulation system is designed to mitigate adverse impacts on the adjacent property from motorized, nonmotorized, and pedestrian traffic.

Property and internal circulation are existing. See aerial site plan – Exhibit A.

7. The site is designed to enable access and circulation for pedestrians and bicycles.

Property and access are existing. See aerial site plan – Exhibit A.

8. Access to the site does not unreasonably impact the service level of any abutting or adjacent street.

Property access is on Redwood Road with no access via abutting or adjacent streets. See aerial site plan – Exhibit A.

9. The location and design of off-street parking complies with applicable standards of this code.

There are approximately 280 open parking spaces and 8 handicapped spaces on the Property. Table 21A.44.040 of the Code requires that a Group Home in the CC zone provide a minimum of “1 space per 4 persons design capacity.” See Chapter 21A.44: *Off Street Parking, Mobility and Loading*, at pg. 7. At maximum, the Program will have approximately 165 Clients. The required number of parking spaces for the Clients is consequently 42 spaces ($165/4 = 41.25$). The off-street parking on the Property more than meets the required number of spaces for the operation of the Program.

The remainder of the Building will be used as office space. Table 21A.44.040 of the Code requires an office building in the CC zone to provide 3 spaces per 1,000 square feet. See Chapter 21A.44: *Off Street Parking, Mobility and Loading*, at pg. 12. The total square footage of the Building is approximately 75,284 square feet. Approximately 28,000 of the Building’s square feet will be dedicated to the Detoxification Program.

Thus, 142 parking spaces are required for that portion of the Building that will be used as office space is ($75,284$ total square feet – $28,000$ square feet dedicated to the Program = $47,284$ square feet; $47,284$ square feet/ $1,000$ square feet = 47.284 ; 47.284×3 parking stalls = 141.852 parking stalls).

In total, the use of the Building for a Group Home and Office Space require a total of 184 parking spaces. The total off-street parking facilities of the Property (approximately 288 spaces in total) more than satisfy the requirements of the Code.

10. Utility capacity is sufficient to support the use at normal service level.

Any adjustments required per code for the change of use will be accommodated in the remodel.

11. The use is appropriately screened, buffered, or separated from adjoining dissimilar uses to mitigate potential use conflicts.

See aerial site plan – Exhibit A and Section B above.

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.

The use will meet city sustainability plans and smoking for Detox clients will only be permitted in two designated, fenced smoking areas (the “*Smoking Areas*”). The Men’s Smoking Area will be located on the back, or east side, of the Building and the Women’s area on the West, both substantially removed from Redwood Road. Pedestrians and drivers on Redwood Road will also likely be unable to smell any cigarette smoke or see anyone using the smoking areas because they will be enclosed by fences that have privacy screening. The Smoking Areas are designed as part of the program space and will be monitored on a regular basis by program staff. The Glendale Golf Course (located behind the Building to the east) will also not be able to see anyone using the Smoking Areas (because of tree cover and fencing with screens) and no golfers are likely to get near the Smoking Areas (because the Building is located at the end of driving range where golfers are not permitted to walk). In sum, because of the location of and VOA’s rules concerning the Smoking Areas, any smoking done by the Program Residents will have a de minimis impact on the surrounding air quality.

Also, because VOA will convert large portions of the Building from cubicles to living space, the VOA will decrease the overall number of people allowed in the Building according to fire code, which will reduce the number of potential smokers in the Building at any given time.

Smoking cessation options are available to detoxing Clients and are specifically encouraged for people who will be transitioned to a residential treatment center where smoking is not allowed on the property. This effort will cut down the percentage of smokers by approximately 15 percent based on residential treatment referral data.

13. The hours of operation and delivery of the use are compatible with surrounding uses.

Standard Office Hours and deliveries occur between 8 a.m. to 5 p.m. Monday through Friday. Admission times vary, but on average the current facility was doing about 10 admissions a day that were spread out through the day and evening.

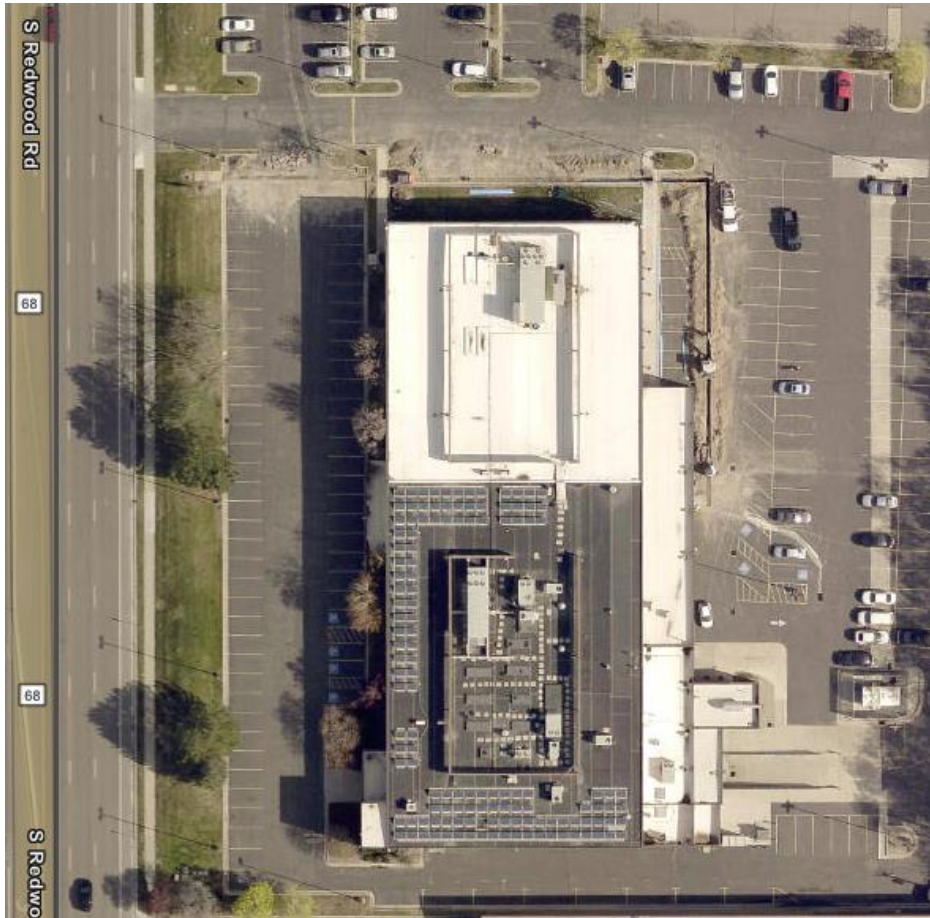
14. Signs and lighting are compatible with, and do not negatively impact surrounding uses.

Any new signage and lighting that might be added for safety, access and internal circulation will comply with the SLC Code and any guidance given by the planning committee.

15. The proposed use does not undermine the preservation of historic resources and structures.

The proposed use would not undermine the preservation of any historic resource or structure.

Exhibit A – Aerial Site Plan

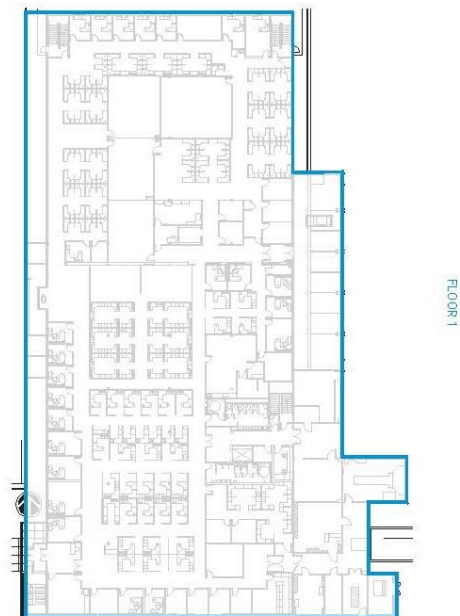
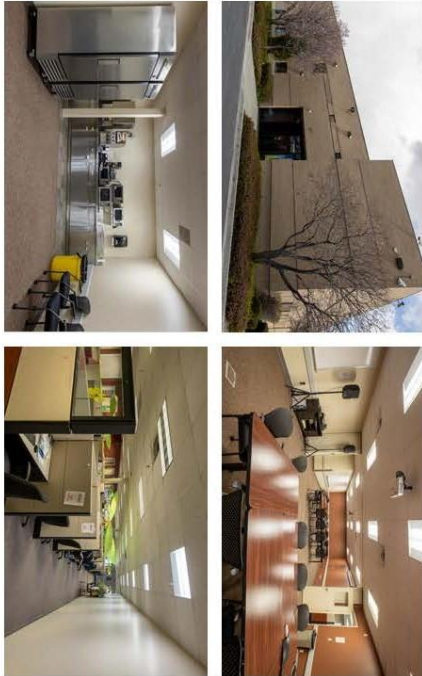


1875 S REDWOOD ROAD SALT LAKE CITY, UTAH

1875 Redwood Road is an office/call center featuring 75,284 square feet of office space with frontage and access along Redwood Road - one of Salt Lake Valley's primary arterial access roads. The building features excellent 201-Freeway and I-215 access, and is located within minutes of the TRAX mass transit/light rail station, approximately 15 minutes from the Salt Lake City International Airport. The building offers a functional, efficient floor plate, with multiple fiber optic providers and enhanced security infrastructure. Area amenities include an adjacent golf course, nearby hotels, restaurants, and electric charging stations.

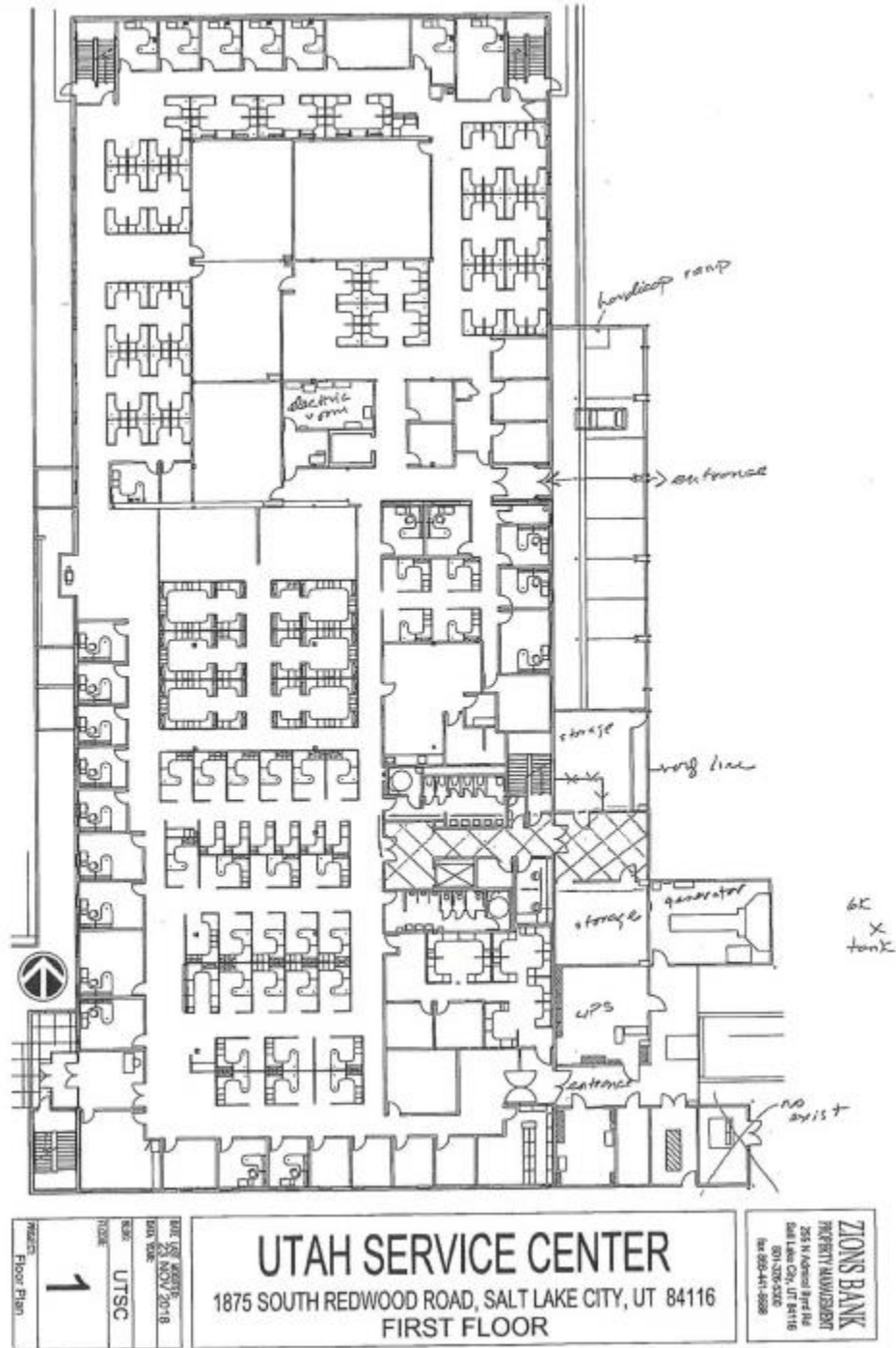
• Total Sq. Ft.:	75,284	• Parking Stalls:	300 +/-
• Typical Floor:	35,990 SF	• Electric Charging Stations:	6
• Class:	C	• Year Built:	1984 / 1996

Exhibit B – Site Plan and Drawings



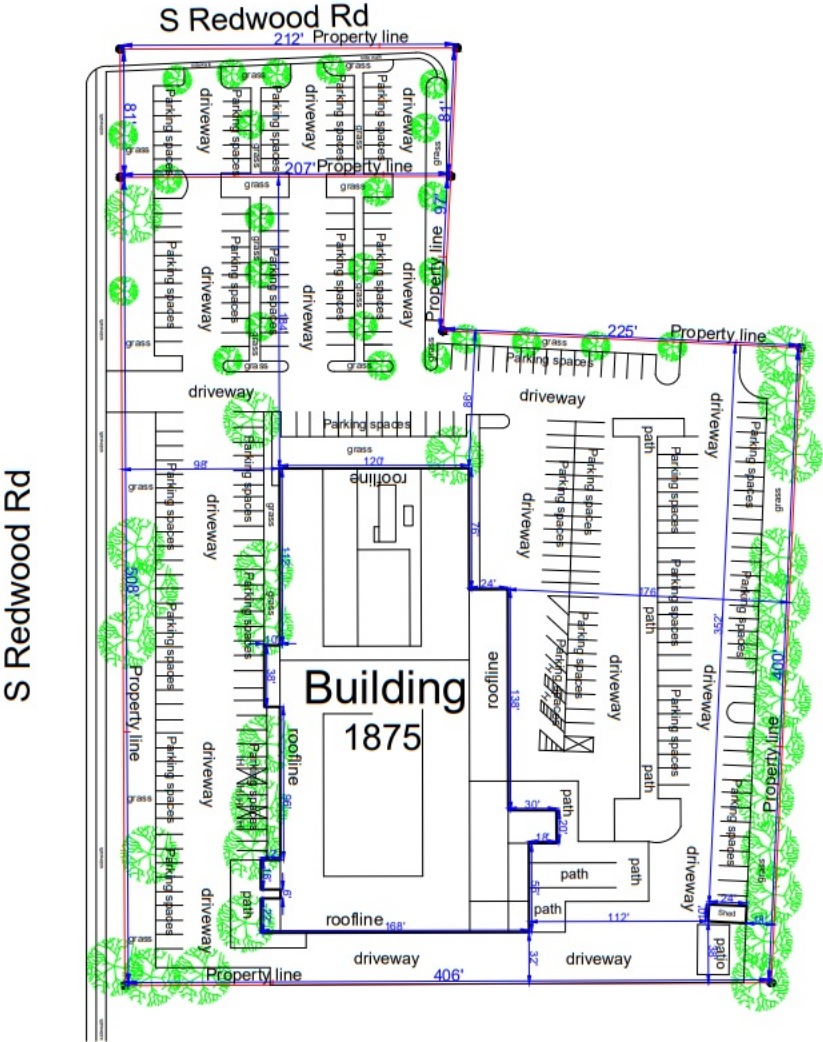
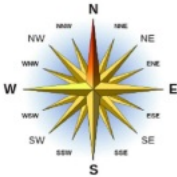
The information in this presentation is intended to provide a general overview of the property and is not intended to constitute an offer of real estate. The information is provided for informational purposes only and is not intended to constitute an offer of real estate. The information is provided for informational purposes only and is not intended to constitute an offer of real estate. The information is provided for informational purposes only and is not intended to constitute an offer of real estate.





SITE PLAN

Address: 1875 S Redwood Rd
City, State, ZIP: Salt Lake City, UT 84104
Country: USA
Scale 1":60'



ATTACHMENT C: Property and Vicinity Photos



Existing building at 1875 S. Redwood Road



South end of existing building.



Adjacent development to the north



Restaurant on the south side of the property



Rear (East side) of existing building



Frontage with UTA bus location on north side of property

ATTACHMENT D: Zoning Standards

Definition - DWELLING, GROUP HOME (LARGE): A residential treatment facility, occupied by seven (7) or more individuals, licensed by the State of Utah under title 62A, chapter 2 of the Utah Code or its successor that provides a twenty four (24) hour group living environment for individuals unrelated to the owner or provider that offers room or board and specialized treatment, behavior modification, rehabilitation, discipline, emotional growth, or habilitation services for persons with emotional, psychological, developmental, or behavioral dysfunctions, impairments, or chemical dependencies. A group home dwelling includes a recovery residence but does not include a boarding school or foster home as defined in title 62A, chapter 2 of the Utah Code or its successor, or a residential support dwelling as defined in this chapter.

Parking Requirements for a Group Home and Office Uses in CC Zone

The parking requirements for a Group Home are relatively meager as the generalized assumption is that clients at such a facility will not have a vehicle on site during their stay. The parking requirements relate more to the support staff that will be present on the site. However, the building will also include office uses in the remainder which require more parking.

Per Chapter 21A.44.030, the following parking standards will apply to the uses:

Group Home - 2 parking spaces per home and 1 parking space for every 2 support staff present during the busiest shift.

Office (General) - 3 spaces per 1,000 square feet of usable floor area for the main floor plus 1.25 spaces per 1,000 square feet of usable floor area for each additional level, including the basement.

The VOA has indicated that 20-25 staff members will be present during the highest employment shift for the Group Home use. This would require 13 parking spaces for the employees and 2 spaces for the home itself, so a total of 15 parking spaces. The building has approximately 76,000 square feet of total space with approximately 30,000 square feet dedicated to the Group Home use. The 46,000 square feet of space dedicated to office uses would require 140 parking spaces. A total of 155 parking spaces are required for the proposed uses. The existing parking count of 280 spaces meets this requirement.

CC (Corridor Commercial District)

Purpose Statement: The purpose of the CC Corridor Commercial District is to provide an environment for efficient and attractive commercial development with a local and regional market area along arterial and major collector streets while promoting compatibility with adjacent neighborhoods through design standards. This district provides economic development opportunities through a mix of land uses, including retail sales and services, entertainment, office and residential. Safe, convenient and inviting connections that provide access to businesses from public sidewalks, bike paths and streets are necessary. Access should follow a hierarchy that places the pedestrian first, bicycle second and automobile third. This district is appropriate in areas where supported by applicable master plans. The standards are intended to promote a safe and aesthetically pleasing environment to all users.

Standard	Requirement	Existing	Finding
Maximum Building Height	30 feet	Existing building – Approximately 30 feet	Complies
Front/Corner/ Side/Rear Yard Setbacks	Front yard: 15 feet Interior side – None Rear yard: 10 feet	Front: Approx. 90 feet Interior: Approx. 40 ft & 177 ft. Rear: Approx. 165 feet	Complies
Buffer Yard	Required if abutting residential	Not adjacent to residential	Not Applicable
Lot Size	Minimum 10,000 SF	4.34 acres/189,000 SF	Complies
Off Street Parking & Loading (21A.44.030.H)	Approximately 155 required total. 15 for Group Home Use 140 for Office Uses	Approximately 280 existing parking spaces on site.	Complies

ATTACHMENT E: Conditional Use Standards

21A.54.080: Conditional Use Standards

An application for a conditional use is required by city code 21A.54 and Utah Code 10-9a-507 to be approved if the proposal complies with the adopted standards of review and if any reasonably anticipated detrimental impact can be mitigated. Under Utah Code 10-9a-507, the standards must be objective and mitigating any reasonably anticipated detrimental impact is required to be interpreted to mean reduce, not eliminate, the impact.

The Finding for each standard is the recommendation of the Planning Division based on the facts associated with the proposal, the discussion that follows, and the input received during the engagement process. Input received after the staff report is published has not been considered in this report.

21A.54.080.A: Approval Standards
Standard 1: The use complies with applicable provisions of this title;
Finding: Complies
Discussion: The property is located in the CC (Commercial Corridor) zoning district. A Large Group Home is allowed as a Conditional Use in the CC zoning district. The proposed use complies with all provisions of the Zoning Ordinance.
Standard 2: The use is compatible, or with conditions of approval can be made compatible, with surrounding uses
Finding: Complies
Discussion: The proposed operations plan provided by the VOA addresses the issues of compatibility that have been raised through the public input process. This is further discussed in the detrimental impacts table (below) and in the Key Considerations section of this report under <i>Consideration 2: Neighborhood Compatibility and Anticipated Impacts</i> and <i>Consideration 3: Public Input and Concerns – Mitigation Measures</i>
Condition(s): Adoption of and adherence to the procedures and principles outlined in the Management, Security and Operations Plan as submitted by the VOA as part of this application.
Standard 3: The use is consistent with applicable adopted city planning policies, documents, and master plans; and
Finding: Complies
Discussion: The use is located along Redwood Road which The Westside Master Plan recognizes as an area that will change over time. The proposed use will provide office space and provide a service that address the well-being of the community and adheres to the principles of fairness, justice and respect as addressed in Plan Salt Lake and the Salt Lake City

Housing Plan. The use is supported by and consistent with adopted city plans and policies. This is further discussed in the Key Considerations section of this report under <i>Consideration 1: Compliance with City Goals, Policies and Plans</i> .
Standard 4: The anticipated detrimental effects of a proposed use can be mitigated by the imposition of reasonable conditions
Finding: Complies
Discussion: See detrimental impacts below.
Condition(s): Adoption of and adherence to the procedures and principles outlined in the Management, Security and Operations Plan as submitted by the VOA as part of this application.
21A.54.080.B: Detrimental Effects Determination
1. This title specifically authorizes the use where it is located;
Finding: No Detrimental Impact
Discussion: The use is classified as a Dwelling – Large Group Home and is authorized as a Conditional Use in the CC – Commercial Corridor zoning district.
Condition(s): None
2. The use is consistent with applicable policies set forth in adopted citywide, community, and small area master plans and future land use maps;
Finding: No Detrimental Impact
Discussion: Complies with adopted city plans and policies as described in the Key Considerations section of this report.
Condition(s): None
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;
Finding: No Detrimental Impact
Discussion: The proposed use will be located within an existing building located along a commercial corridor. There are no adjacent residential uses or structures and the use will not generate significant foot traffic. The use is suited to the character of the site.
Condition(s): None
4. The mass, scale, style, design, and architectural detailing of the surrounding structures as they relate to the proposed have been considered;
Finding: No Detrimental Impact

Discussion: The building is existing and has been built and used as an office. It is compatible with the neighboring buildings and the exterior is not being changed.
Condition(s): None
5. Access points and driveways are designed to minimize grading of natural topography, direct vehicular traffic onto major streets, and not impede traffic flows;
Finding: No Detrimental Impact
Discussion: The proposed use is located along a major State arterial and access to and from Redwood will be via the existing driveways. There is no neighborhood access to the site and the use will not impede traffic flows.
Condition(s): None
6. The internal circulation system is designed to mitigate adverse impacts on adjacent property from motorized, nonmotorized, and pedestrian traffic;
Finding: No Detrimental Impact
Discussion: The site layout and driveways are existing and not being modified by this request. The change in use will not introduce adverse impacts on adjacent properties from motorized or pedestrian traffic.
Condition(s): None
7. The site is designed to enable access and circulation for pedestrian and bicycles;
Finding: No Detrimental Impact
Discussion: The site layout and driveways are existing and not being modified by this request. They allow for pedestrian and bicycle access and circulation.
Condition(s): None
8. Access to the site does not unreasonably impact the service level of any abutting or adjacent street;
Finding: No Detrimental Impact
Discussion: The use is located along Redwood Road, a major State arterial road. The use will not impact service levels on that street.
Condition(s): None
9. The location and design of off street parking complies with applicable standards of this code;
Finding: No Detrimental Impact
Discussion: There are approximately 280 existing parking spaces on the site. The Group Home use would require 15 parking spaces while the remaining office uses would require

approximately 140 spaces. A total of 155 parking spaces will be required. The available on site parking exceeds the requirements.
Condition(s): None
10. Utility capacity is sufficient to support the use at normal service levels;
Finding: No Detrimental Impact
Discussion: Other City Departments have indicated no opposition to the proposal. The Public Utilities Department has indicated that some upgrades to the sewer may be required for the commercial kitchen. This would also be the case for a restaurant which is allowed as a permitted use in the district. The issues of sewer capacity and any required upgrades will be addressed at the Building Permit stage of development.
Condition(s): None – will be addressed at the time of Building Permits
11. The use is appropriately screened, buffered, or separated from adjoining dissimilar uses to mitigate potential use conflicts;
Finding: No Detrimental Impact
Discussion: The proposed use will take place within the interior of the building. The building itself is located on a site that is approximately 4.35 acres in size and the closest building in any direction is approximately 50 feet. By virtue of its location on the site, the use will be well buffered from all adjacent uses.
Condition(s): None
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;
Finding: No Detrimental Impact
Discussion: The use will not impact water, river or stream resources. There will be designated outdoor smoking areas on the site and smoking will not be allowed in other locations. The placement of building itself far away from the property lines in and of itself provides sufficient buffering between the use and neighboring properties. The provided SOP addresses the issues of smoking and reasonably addresses the concerns of smoke impacting adjacent properties.
Condition(s): Adoption of and adherence to the procedures and principles outlined in the Management, Security and Operations Plan as submitted by the VOA in their Narrative as part of this application.
13. The hours of operation and delivery of the use are compatible with surrounding uses;
Finding: No Detrimental Impact

Discussion: The use is located along a busy commercial corridor with a variety of businesses that have varying office and operational hours. The standard office hours will be 8-5 Monday through Friday. Admissions may take place at other times. Given the site context, the hours of operation will not have an impact on surrounding uses.
Condition(s): None
14. Signs and lighting are compatible with, and do not negatively impact surrounding uses;
Finding: No Detrimental Impact
Discussion: No specific signs have been proposed with the use. Signs of various sizes are common along Redwood Road and allowed through building permits. Any signs proposed by the applicant will be evaluated by staff at the time they are proposed and will not require action by the Planning Commission.
Condition(s): None
15. The proposed use does not undermine preservation of historic resources and structures.
Finding: No Detrimental Impact
Discussion: There are no historic structures or resources present on the site.
Condition(s): None

According to Zoning Code Section 21A.54.080.C, the Planning Commission may impose conditions related to the standards and detrimental impacts listed above if a condition is necessary for compliance with the standards of approval or any applicable zoning regulation and to reduce any reasonably anticipated detrimental impact. Conditions may be related to:

1. Conditions on the scope of the use; its character, location, hours and methods of operation, architecture, signage, construction, landscaping, access, loading and parking, sanitation, drainage and utilities, fencing and screening, and setbacks; and
2. Conditions needed to mitigate any natural hazards; assure public safety; address environmental impacts; and mitigate dust, fumes, smoke, odor, noise, vibrations; chemicals, toxins, pathogens, gases, heat, light, and radiation.

After a public hearing is held, planning staff can help the commission identify and determine if information provided warrants further discussion on any potential non-compliance or detrimental impact that may require a condition of approval.

ATTACHMENT F: Public Process & 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 since the applications were submitted:

- January 19, 2022 – The Glendale Community Council (GCC) was sent the required 45-day notice for recognized community organizations. The letter included information about the Online Open House. The GCC did not provide any comments.
- January 19, 2022 - Property owners and residents within 300 feet of the development were provided early notification of the proposal. The notice included information about the Online Open House.
- January 24, 2022 – The project was posted to the Online Open House webpage. The Open House webpage was online from January 24, 2022 until March 8, 2022.

Notice of the public hearing for the proposal included:

- April 27, 2022
 - Public hearing notice sign posted on the property
- April 27, 2022
 - Public hearing notice mailed
 - Public notice posted on City and State websites and Planning Division list serve

Public Input:

Staff received a letter from Armstrong Teasdale dated March 8, 2022 objecting to the use as they relate to the Conditional Use standards. The details of these concerns are included in Consideration 3: Public Input and Concerns starting on Page 4 of this report and the letter as well as a response letter from the VOA is included in [Attachment F](#).



Brennan H. Moss

Direct T 801.401.1608 C 801.633.4292

bmos@atllp.com

March 8, 2022

David J. Gellner
AICP, Senior Planner
Telephone: 801-535-6107
Email: david.gellner@slcgov.com

Alejandro Puy
Salt Lake City Council, District 2
Telephone: (801) 535-7781
Email: alejandro.puy@slcgov.com

Turner Bitton
Glendale Community Council
Telephone: 801-564-3860
Email: chair@glendaleutah.org

Re: VOA Conditional Use Petition; Petition Number PLNPCM2002-00019

Dear Sirs:

I represent the owner of a property located near 1875 S. Redwood Rd, Salt Lake City, Utah. I write to voice opposition for the Conditional Use Permit requested by Volunteers of America's ("VOA") Detoxification Clinic (the "Building") for the property located at 1875 S. Redwood Rd, Salt Lake City, Utah. We have looked closely at the VOA's proposal and plan and investigated the VOA's claims. This opposition is centered around our opinion that the VOA has not meet its burden to show it can mitigate reasonably anticipated detrimental effects of its proposed detox center.¹ The VOA's plan fails to address all anticipated detrimental effects of the proposed detox center, and of the anticipated detrimental effects the plan addresses, the VOA's track

¹ Utah Code Ann. § 10-9a-507

record casts doubt on its ability to properly mitigate those effects. The following are of specific concern:

1. The current plan does not successfully mitigate adverse air effects, including cigarette smoke as required by 21A.54.080(B)(12)

Salt Lake City Code (the “Code”) requires that for a conditional use permit to be granted, the use “would not significantly impact the quality of surrounding air . . . including cigarette smoke.”² While the current VOA plan is designed with gated areas in an attempt to minimize the impact, we believe that that adverse air effects are unable to be mitigated. The plan anticipates 165 residents plus staff and building maintenance.

The Society for the Study of Addiction (“SSA”) has found that 71% of illicit drug users smoked cigarettes at least once in the past month, and the adjusted odds of being a smoker were much greater than for the general population.³ That number will likely be greater among the VOA residence because it is common for addicts to use tobacco as they wean off stronger addictive drugs. If only using the numbers in the study, an estimated 117 of the proposed 165 residents will be smokers. Assuming smokers consume multiple cigarettes per day, adding 117 smokers throughout the day would create a constant stream of smoke and substantially impact the air quality around the building and the surrounding area. The amount of smokers and individuals outside the building cannot be mitigated simply by creating a fenced area where residents can smoke. A more proper solution would be to include an indoor area that ventilates the smoke, however, the Utah clean air act only allows such locations for airports or hotels.⁴

2. The VOA plan fails to mitigate the potential issue of loitering

While the VOA’s narration indicates that loitering of Clients has been mitigated via 24/7 monitoring, it fails to take into account loitering of individuals arriving at the facility, departing from the facility, or attempting to visit a resident at the facility. While the VOA may be able to control loitering of individuals in its program, it cannot control loitering individuals outside the program.

This is apparent at the VOA’s other centers. As mentioned in the VOA’s narrative, it has operated centers in Utah for 35 years. This operation provides insight into the VOA’s operation of its centers. For example, the VOA Detox center on 252 Brooklyn Avenue has negative reviews from surrounding neighbors complaining of clients and their families who are waiting

² SLCC 21A.54.080(B)(11)

³ Richter et. al, *A population-based study of cigarette smoking among illicit drug users in the United States*, *Addiction*, v. 97 issue 7, (July 2002).

⁴ See Utah Code Ann § 26-38-1, et seq.

around (on at least one occasion in the middle of the night) for a spot in the clinic to open up. One example is from Sean Behjani who tried to check into the detox center at 1:00 PM in the afternoon.⁵ Staff put Sean's name on a list and gave him a time to come back. Sean returned at 11:00 PM at night and proceeded to wait around for nearly four hours to be admitted. Another review, posted on Nov 26, 2021 by CEQM 83, indicates that after an admission error, a potential client was asked to wait outside until a spot became available.⁶ As mentioned by the VOA, the individuals checking into their program are usually homeless, involved in criminal activities, or both. These individuals hanging outside the building likely do not have a place to go until they are allowed into the center. These individuals present anticipated detrimental effects of increased crimes against the surrounding property and businesses. In summary, the VOA's anti-loitering rule does not mitigate the impact because it fails to prevent loitering by their potential clients, or the friends and family of its clients.

Further, The VOA's narration indicates that "Visitors are limited and monitored inside the facility or on its grounds." However, the VOA Narrative fails to identify specifics about the who's, when's, and how's of visitation. Because of this, legitimate concerns exist surrounding congestion outside the building and in the parking lot, noise issues, littering, and other potentially negative effects.

3. The VOA's current plan does not currently contain a sufficient community relations program to help minimize potential conflicts with neighboring properties.

Currently, the VOA's proposal plans for an agency representative to attend the monthly Glendale Neighborhood Council meetings so it can be available to receive questions and concerns. That availability is insufficient to properly mitigate the potential issues arising from the Detox center. The plan fails to provide a method for businesses or neighbors to report concerns to VOA outside of this monthly meeting. The plan further fails to provide a method by which the VOA will address and remedy concerns. The VOA's past performance demonstrates an inability to promptly respond and address neighbors' concerns.

One example arises from the VOA location at 432 W. Bearcat Dr, where people have taken to Google Reviews to report issues. Naturally, people take to Google Reviews when they cannot get a direct response from a business owner/operator. For example, Airome Wind posted 5 years ago that she was unable to contact the VOA director of community engagement regarding a potential resident who was camping out in her driveway.⁷ A VOA representative finally responded to the Google Review over 4 years after it was posted.

⁵ <https://goo.gl/maps/X1P51NDVksC65nEu8>

⁶ <https://goo.gl/maps/SChdBhmHiLBssix9>

⁷ <https://goo.gl/maps/PLiQ2n1ZftHKQimA9>

The VOA recognizes the anticipated 165 occupants are those that would otherwise be involved in high crime or homelessness (see VOA narrative). The proposed center will draw the anticipated occupants, their friends, and family members to the locations. The VOA must propose proper mitigation plan to handle all issues arising from having those individuals around the area, including a proper response program.

4. The VOA's plan is missing key points of a proper mitigation plan for its proposed use.

The VOA mitigation does not reasonably address all anticipated detrimental effects of its conditional use. The VOA plan must properly address the following anticipated detrimental effects:

The VOA mitigation plan must establish how it will meet the detrimental impact of having its occupants regularly smoke outside of the building. Due to the number of anticipated occupants, an outdoor smoking area is not proper because the quantity of second hand smoke cannot be properly mitigated. The mitigation plan should create a proposal for how all smoking can be done indoors as permitted by the Utah Indoor Clean Air Act.⁸

The VOA mitigation plan must also address the environmental impact of housing 165 residents plus staff for the area. The number of residents will impact the utilities, sewer, etc.

The VOA mitigation plan must also address any subsequent failure to adhere to its proposed mitigation plan. If VOA's practices depart from the proposed plan, as it has in other areas, then it must propose a plan for how it will address and remedy any such departure. Further, any departure from the proposed mitigation plan should result in the immediate forfeiture of the conditional use permit. The surrounding neighbors should not be burdened by a neighbor that proposes a mitigation plan that it cannot, or will not, fulfill.

The VOA mitigation plan must address a system for receiving and responding to calls from neighbors and concerned citizens regarding any issues with persons related to the proposed facility; regardless of whether those individuals are prospective patients, future patients, past patients, friends of patients, or family of patients.

The VOA mitigation plan must address how it will mitigate increased litter, trash, or other waste on the premises or on neighboring properties.

The VOA mitigation plan must address the need for continuous on-site security, monitored security cameras, trained emergency responders, and emergency alert systems.

⁸ Utah Code Ann § 26-38-3(2)(b)

The VOA mitigation plan must address long term issues and concerns. It must propose a Community Coordinating Group to discuss and address concerns and issues that may be occurring. The mitigation plan should address how often the Group should meet and the proposed representatives.

Conclusion

The VOA mitigation plan does not properly address the issues that must be mitigated in order for it to receive a conditional use permit to run a Detox facility for 165 patients. Of the mitigation plans the VOA has put forward, it has already shown through the operation of its other locations that it cannot, and will not, comply with the objective standards of its plan. The VOA's request for a conditional use permit should be denied for its failure to show proper mitigation of all anticipated detrimental effects, as required by statute, and its history of failing to mitigate in the manner it proposes.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brennan H. Moss", is written over a light blue horizontal line.

Brennan H. Moss

BHM:sen

April 7, 2022

Via Email

David Gellner, Senior Planner, Planning Division
Department of Community and Neighborhoods
Salt Lake City Corporation

**Re: Response to Letter; Volunteers of America Conditional Use
Permit Application**

Dear Mr. Gellner,

We hope this letter finds you well. This firm represents Volunteers of America, Utah (“VOA”). VOA owns property located at 1875 South Redwood Road, Salt Lake City, Utah (the “Property”). VOA has submitted a conditional use permit application (the “Application”) to start a Clinically Monitored Social Model Detoxification and Withdrawal Management Program (the “Program”) at the Property.

During the public comment period for the Application, one person, Brennan Moss—who apparently represents an owner of land near the Property (the “Anonymous Owner”)—submitted a letter (the “Letter”) outlining concerns the Anonymous Owner supposedly has concerning the proposed Program. Mr. Moss did not indicate how or in what capacity he represents the Anonymous Owner, divulge the identity of the Anonymous Owner, or state what property the Anonymous Owner owns that is supposedly “near” the Property. As a result, it is our position that the Planning Commission should disregard or appropriately discount any comments in the Letter until the Anonymous Owner is identified.

While the updated Application generally addresses the Anonymous Owner’s purported concerns, we wanted the opportunity to specifically contest some conclusory allegations contained in the Letter concerning attendees of the Program smoking on the Property.

The Letter cites to a singular study (the “Study”) that apparently determined approximately 71% of illicit drug users smoked “*at least once in the last month.*” The Letter does not describe (i) the methodology the Study authors used to gather their data, (ii) the population sample size used in the Study, (iii) the location where the Study was conducted, or (iv) the kinds of “illicit drugs” the participants in the study were supposedly using. Absent such supporting evidence, VOA can’t opine as to the validity of the Study or whether it is applicable to the persons who will attend the Program.

ATTORNEYS AT LAW

Clark P. Giles
D. Jay Curtis
James S. Jardine
Larry G. Moore
Bruce L. Olson
John A. Adams
Craig Carlile
Jeffrey W. Appel
David J. Castleton
Ellen J. D. Toscano
Kevin G. Glade
Lester K. Essig
Stephen C. Tingey
John R. Madsen
Scott A. Hagen
Rick L. Rose
Brent D. Wride
Steven W. Call
Sally B. McMinimee
Steven G. Jones
Mark A. Cotter
Greggory J. Savage
Kelly J. Applegate
Justin T. Toth
Liesel B. Stevens
Robert O. Rice
Arthur B. Berger
Rick Thaler
John W. Mackay
McKay M. Pearson
Mark W. Pugsley
Matthew N. Evans
Gary L. Longmore
John P. Wunderli
Michael R. Johnson
E. Blaine Rawson
Samuel C. Straight
Paul C. Burke
Elaina M. Maragakis
D. Zachary Wiseman
Michael D. Mayfield
Bryan K. Bassett
Kamie F. Brown
Gregg D. Stephenson
Michael F. Thomson
Kristine M. Larsen
Gregory S. Roberts
Christopher N. Nelson
Angela E. Atkin
Thomas M. Hardman
Samuel A. Lambert
David H. Leigh
Gavin M. Reese
Richard H. Madsen, II
S. Brandon Owen
Charles H. Livsey
David B. Dibble
Carol A. Funk
Maria E. Windham
Blake R. Bauman
Michael K. Erickson
R. Troy Mollerup
Paul N. Taylor
Z. Ryan Pahnke
Matthew M. Cannon
Tiffany Brooks Healy
James A. Sorenson
Allison G. Behjani
Skye Lazaro
Adam K. Richards
Blake R. Voorhees
Beth J. Ranschau
Jeffrey S. Rasmussen
James Bullough
Katherine E. Priest
Jascha K. Clark
John O. Carpenter
Katherine B. Benson
Whitney Hulet Krogue
Blake M. Biddulph
Garrett W. Messerly
Raj Dhallwal
Justin M. Kuettel
Thomas Lingard
Aaron C. Hinton
Jason M. Tholen
Andrew Applegate

OF COUNSEL
M. John Ashton
Herbert C. Livsey
Gerald T. Snow
Jonathan A. Dibble
Douglas M. Monson
Elaine A. Monson
Katie A. Eccles
Jordan Christianson
Anjali J. Patel

SALT LAKE CITY OFFICE
PO Box 45385
Salt Lake City, Utah
84145-0385

36 South State Street
Suite 1400
Salt Lake City, Utah
84111

801 532-1500 TEL
801 532-7543 FAX
www.rqn.com

PROVO OFFICE
86 North University Ave
Suite 430
Provo, Utah
84601-4420

801 342-2400 TEL
801 375-8379 FAX



However, even if the Study were assumed to be an accurate indicator of cigarette use amongst illicit drug users (and specifically those persons attending the Program) the Letter mischaracterizes the few results of the Study that the Letter did share. The Study stated that 71% of illicit drug users smoked at “*least once in the last month*.” The Letter attempts to twist that finding to say that the Program could add “117 smokers *throughout the day*” (71% of the maximum 165 residents) that could smoke multiple times per day and create a “constant stream of smoke.” Those conclusions are unsupported by the Study. The Study determined that 71% of the Study participants has smoked *once in the last month*—not that the 71% of the Study participants had smoked every day or multiple times a day. VOA anticipates that far fewer than 71% of the Program Residents will be smoking a daily basis or at all while they stay at the Program.

Sincerely,

RAY QUINNEY & NEBEKER

A handwritten signature in black ink, appearing to read "Andrew Applegate". The signature is fluid and cursive, with the first name "Andrew" and last name "Applegate" clearly distinguishable.

Andrew Applegate

Gellner, David

From: george chapman <gechapman2@gmail.com>
Sent: Tuesday, January 25, 2022 8:24 AM
To: Gellner, David
Cc: Puy, Alejandro
Subject: (EXTERNAL) Comments on VOA detox facility PLNPCM2022-00019

I am against the proposed facility on Redwood Rd since the VOA is unable to keep the crime and calls for service around the detox facility on Brooklyn low. That detox facility has one of the highest calls for service in the City (which may be due to just a couple of individuals but nevertheless impacts the police and community).

This facility should not be approved without significant funding for security not just in the facility but around the block which could be impacted based on the history of similar SLC facilities.
George Chapman 1186S 1100E SLC

ATTACHMENT G: Department Review Comments

This proposal was reviewed by the following departments. Any requirement identified by a City Department is required to be complied with.

Engineering: Scott Weiler

No comments or objections from Engineering.

Transportation: Michael Barry

There appears to be ample parking on site and the minimum parking requirement for a group home is fairly small: 2 parking spaces per home and 1 parking space for every 2 support staff present during the busiest shift.

Fire: Douglas Bateman

No comments provided. Additional comments will be provided at the Building Permit stage depending on the configuration of the space for occupancy.

Urban Forestry:

No comments provided.

Police: Lamar Ewell

No objections or comments from the SLCPD.

SLC Airport: David Miller

Regarding the property located at 1875 S Redwood Road: This address is in the Salt Lake City's Airport Influence Zone "H" (see attached) Salt Lake City does not require an aviation easement for new development in this zone. This area does have height restrictions. This project area has a height restriction of 4380.5' MSL approximately 255' above ground level. This project creates no observed impacts to airport operations.

Public Utilities: Jason Draper

I am not too concerned with the existing utilities – the sewer system will be the only concern. They will need to do some upgrades for the commercial kitchen and maybe to the site for stormwater controls.

The following comments do not provide official project review or approval. Planning approval

does not provide building or utility permit approval. Comments are provided to assist in design and development by providing guidance for project requirements.

- Site stormwater must be collected on site and routed to the public storm drain system.*

Stormwater cannot discharge across property lines or public sidewalks. Stormwater Quality best management practices (BMPs)

- All utility design and construction must comply with APWA Standards and SLCPU Standard Practices.*

- All utilities must meet horizontal and vertical clearance requirements. Water and sewer lines require 10 ft minimum horizontal separation and 18" minimum vertical separation. Sewer must maintain 5 ft minimum horizontal separation and 12" vertical separation from any non-water utilities. Water must maintain 3 ft minimum horizontal separation and 12" vertical separation from any non-sewer utilities.*

- The site currently has a 2" culinary water service and a 6" fire connection.*

- Utilities cannot cross property lines without appropriate easements and agreements between property owners.*

- Other plans such as erosion control plans and plumbing plans may also be required, depending on the scope of work. Submit supporting documents and calculations along with the plans.*

- There are several sewer laterals to this property. Unused laterals need to be capped at the main.*

- The conversion to a commercial kitchen will require updates to the plumbing and sewer system. The kitchen area drains will need to go through a grease removal device. P*

- Offsite utility improvements may be required as part of this project.*

- Additional requirements will be provided in building permit review if the conditional use is approved.*