



Staff Report

PLANNING DIVISION

DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: Salt Lake City Planning Commission

From: Daniel Echeverria, 801-535-7165, daniel.echeverria@slcgov.com

Date: June 17, 2022 (publication)

Re: Capitol Park Cottages Zoning Map/Master Plan Amendment- PLNPCM2020-00335/00334

Zoning Map and Master Plan Amendment

PROPERTY ADDRESS: 675 N F Street (approximate)

PARCEL ID: 09-30-455-021

PROPERTY SIZE: 3.21 acres

MASTER PLAN: Avenues Community Master Plan

FUTURE LAND USE: *Current* – Very Low Density Residential

Proposed – Low Density Residential

ZONING DISTRICT: *Current* – FR-3/12,000 “Foothills Residential District”

Proposed – SR-1 “Special Development Pattern Residential”

REQUEST:

Peter Gamvroulas, representing the property owner Ivory Development, is requesting zoning map and master plan amendments for property located at approximately 675 N F Street. The request includes the following applications:

1. **Zoning Map Amendment (Rezone):** The applicant is requesting to amend the zoning of the property from the FR-3/12,000 "Foothills Residential District" to the SR-1 "Special Development Pattern" zoning district. Although the applicant has requested that the property be rezoned to the SR-1 zone, consideration may be given to rezoning the property to another zoning district with similar characteristics.
2. **Master Plan Amendment:** The applicant is requesting to amend the master plan designation for the property in the Avenues Community Master Plan from "Very Low Density" to "Low Density."

The final decision maker on these requests is the City Council. The requests are intended to accommodate two pending Planned Development and Subdivision requests for a 19-lot single-family dwelling development titled “Capitol Park Cottages.”

RECOMMENDATION:

Based on the findings listed in the staff report, Planning Staff recommends that the Planning Commission forward a favorable recommendation for the rezone request to the City Council.

1. Accessory buildings shall not be allowed in rear yards located along the west-most property line of the subject property.

2. Where the west-most property line is a rear property line, the second levels of any homes located along that rear property line shall be setback at least 30' from the corresponding rear property line.

ATTACHMENTS:

- A. [ATTACHMENT A: Zoning and Future Land Use Maps](#)
- B. [ATTACHMENT B: Applicant's Narrative and Background Materials](#)
- C. [ATTACHMENT C: Concept Site Plans and Elevations](#)
- D. [ATTACHMENT D: FR-3 and SR-1 Zoning Summaries](#)
- E. [ATTACHMENT E: Property & Vicinity Photographs](#)
- F. [ATTACHMENT F: City Master Plan Policies](#)
- G. [ATTACHMENT G: Analysis of Standards – Zoning Map Amendment](#)
- H. [ATTACHMENT H: Public Process and Comments](#)
- I. [ATTACHMENT I: Department Review Comments](#)
- J. [ATTACHMENT J: Supplemental Maps](#)
- K. [ATTACHMENT K: Public Comments](#)

TABLE OF CONTENTS

1. Petition Description.....	3
a. Zoning Map & Master Plan Amendment Requests	3
b. Subject Property Context	7
c. Density Potentials of the Current and Proposed Zones.....	4
d. Regulations of the Current and Proposed Zones.....	6
e. Applicable Review Processes and Standards.....	7
f. Community Input and Public Process	8
2. Key Considerations	9
a. Proposed Zone Potential Effects on Adjacent Properties	9
b. Zoning and Density Context	12
c. Avenues Master Plan and Citywide Housing Policies	14
d. Gentrification and Displacement with Rezones	16
e. Proposed Development Plans.....	16
f. Public Comments and Concerns.....	19
3. Discussion	23
4. Next Steps	24
5. Attachments	25

Petition Description

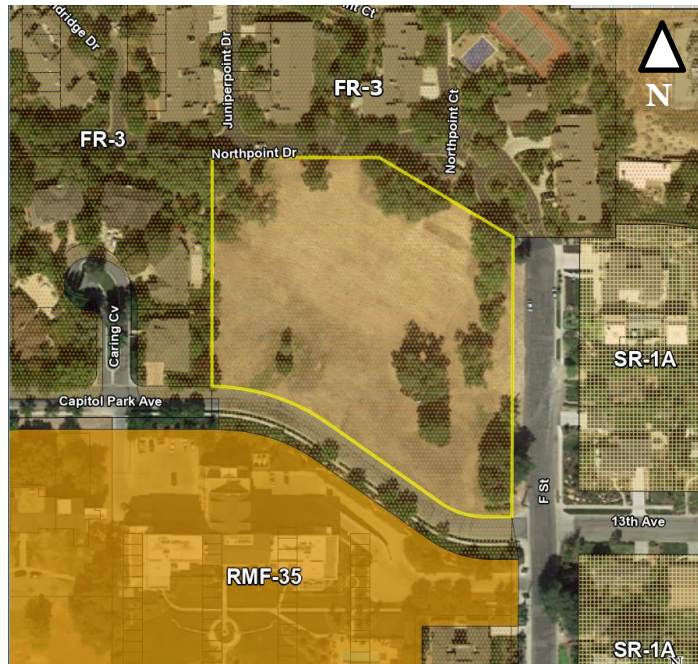
Ivory Development is requesting a Zoning Amendment and a Master Plan Amendment in order to facilitate a proposed 19-lot single-family development. The development has been submitted as a Planned Development and Preliminary Subdivision that may come before the Commission at a later date, but these are not part of the petitions before the Commission at this time.

Zoning/Plan Amendment

- **Current Zone:** FR-3/12,000 (Foothills Residential District)
- **Single-family Min. Lot Size:** 12,000 sq ft
- **Current Maximum Density:** 11 single-family lots with 11 ADUs
- **Proposed Zone:** SR-1 (Special Development Pattern Residential)
- **Single-family Min. Lot Size:** 5,000 sq ft
- **Proposed Maximum Density:** 27 single-family lots, with 27 ADUs (the concept plan proposes 19 lots with 14 ADUs)

Adjacent Zones:

- FR-3 (Foothills Residential)
- RMF-35 (Moderate Density Multi-family Residential)
- SR-1A (Special Development Pattern Residential)



Map showing the zoning of the area. A larger size map is located in [Attachment A](#). The property is located at the corner of F Street and 13th Avenue.

Zoning Map and Master Plan Amendment Requests

The owner is requesting to rezone the property from FR-3/12,000 (Foothills Residential) Zoning District to the SR-1 (Special Development Pattern Residential) Zoning District in order to accommodate the number of homes proposed for the site. The FR-3/12,000 zone would only allow up to 11 single-family homes on the property due to its lot size regulations, so the owner is requesting the SR-1 zone which will allow for their proposed density.

The owner is also requesting to amend the corresponding “Future Land Use Map” designation for the property in the *Avenues Community Master Plan* (1987) from “Very Low Density” to “Low Density” so that the master plan will correspond with their requested low-density zone.

The applicant has provided a detailed narrative about the reasons for their request and how they believe it complies with the City’s considerations for a rezone and master plan amendment in [Attachment G](#).

Subject Property Context



Birds-eye view of the subject property and context (Credit: Google Earth 2022)

The property is approximately 139,740 square feet (~3.2 acres) in size and is currently vacant. For size perspective, a typical Avenues block is approximately 108,900 square feet in area (330' x 330'). To the east of the site across F Street are three single-family homes and a duplex. These homes are one to two stories in height.

To the north is a 49-unit condominium/townhome style development that was approved as a Planned Unit Development in 1978. These are two to three stories in height. To the west are three single-family homes in the Capitol Park subdivision that received Planed Development approval in 1995. These are one to two-stories in height. To the south across Capitol Park Avenue is a five to six-story condominium building containing 27-units.



View of the subject property from the corner of F Street and 13th Avenue/Capitol Park Avenue. The Meridian condo building can be seen on the left. Additional context photos are available in [Attachment E](#). (Credit: Google Street View 2022)

Density Potentials of the Current and Proposed Zones

The below table provides information for the current development potential of the subject property under the current and proposed zones, and under the developer's concept plan proposal from their Planned Development and Subdivision applications.

	FR-3 (Current)	SR-1 (Proposed Zone)	Applicant's Concept Development Plan (For Context)
Single-family Max. Density for the Property*	<ul style="list-style-type: none"> • 11 single-family homes, w/ 11 ADUs. • 22 total dwelling units 	<ul style="list-style-type: none"> • 27 single-family homes w/ 27 ADUs. • 54 total dwelling units 	<ul style="list-style-type: none"> • 19 single-family homes w/ 14 ADUs • 33 total dwelling units (38 if all custom homes include ADUs)
Min. Lot Size Required per Single-family Dwelling	12,000 sq ft (3.6 dwelling units per acre, 7.3 du/ac w/ADUs)	5,000 sq ft (8.7 du/ac, 17.4 du/ac w/ ADUs)	~7,359 sq ft (average lot size based on parcel acreage and number of lots)
Effective Density for Subject Property (w/o ADU) based on # of lots on 3.21 acres	~3.4 units per acre	~8.4 units per acre	~5.9 units per acre
Effective Density for Subject Property (w/ ADU) based on # of lots at 3.21 acres	~6.9 units per acre	~16.8 units per acre	~10.3 units per acre (~11.8 units per acre if all homes, including custom homes include ADUs)

*This number can be misleading. The real-world density for a by-right development (without special Planning Commission approvals, such as Planned Development) in either zone is lower due to the amount of land that would be taken up by public streets, the impact of lot width requirements on practical lot configurations, and the limited number of curb cuts (one) allowed onto the private street Capitol Park Avenue. Staff estimates the real-world by-right density may be closer to 9 lots for the FR-3 zone and 18 lots for the SR-1 zone.

The property is currently zoned FR-3/12,000 "Foothills Residential District," which has a minimum lot area requirement of 12,000 square feet per single-family home. Based strictly on the total area of the subject property (3.21 acres or ~139,827 sq ft), the property would be allowed up to 11 single-family home lots. Each home could include an accessory dwelling unit, for a total of 22 total dwelling units on the property. The realistic number of possible lots is likely closer to 9 single-family home lots due to lot dimension and public street requirements, and the limitation on curb cuts (one) on Capitol Park Avenue due to private agreements.

The proposed zone, SR-1 "Special Development Pattern Residential," requires a minimum lot area of 5,000 square feet per single-family home. At a maximum, this zone would technically allow up to 27 single-family home lots. Each could have an accessory dwelling unit for a total of 54 total dwellings. The developer's proposed concept plans call for 33 dwellings units, (19 lots with 14 ADUs) which is 11 more units than currently allowed in the FR-3 zone, but under the 54-unit (27 lots + 27 ADU) maximum development potential of the SR-1 zone. As with the FR-3, the realistic number of possible lots allowed without a special approval process, such as Planned Development, is likely lower and may be closer to 18 single-family home lots rather than 27 lots. Each of the single-family homes could have an ADU for a total of 36 total dwelling

units. This results in a density of 5.6 du/acre counting only single-family homes, with a maximum of 11.2 du/acre if ADUs are included. Similarly, if the property was designed for duplexes, it could have up to 34 dwelling units, with a total allowable density of 10.89 du/acre.

Regulations of the Current and Proposed Zones

For context, the SR-1 zone is very similar to the SR-1A zone, which covers the adjacent properties to the east and most of the residences below what is identified as the Upper Avenues in the Avenues Master Plan (generally the area above 13th Avenue). The only differences between the SR-1 and SR-1A are a height limit (28' for the SR-1 versus 23' for the SR-1A) and accessory structure limits (720 sq ft for SR-1 versus 600 sq ft for SR-1A). Other regulations for the zones are identical.

Graphical summary diagrams of the FR-3 and SR-1 zone, showing bulk and mass regulations, are in [Attachment D](#). A table comparing the main regulations of the FR-3 and SR-1 regulations for single-family home development is below. The most significant differences are highlighted.

Zone Regulation Comparison Table – FR-3 and SR-1

Zoning Standard	FR-3 (Existing)	SR-1 (Proposed)	Difference
Lot Size (min.)	Min. 12,000 sq ft	Min. 5,000 sq ft	7,000 sq ft less
Lot Width (min.)	80'	50'	30' less
Front Yard (min.)	Average of block face or 20'	Average of block face or 20'	None
Corner Side Yard (min.)	Average of block face or 20'	10'	10' less
Interior Side Yard (min.)	10'/10'	4'/10'	6' less on one side yard
Rear Yard (min.)	35'	25% of lot depth, min. 15', max. 30' (100' deep lot = 25')	FR-3 min. is at least 5' greater than SR-1; will vary based on lot depth.
Building Height (max.)	28' max.	28' max.	None
Wall Height Front/Rear/Side (max.)	Front/rear: 25' Side: No limit	Front/rear: No limit Side: 20' at side setback	SR-1 limits sides only. FR-3 limits front/rear only.
Building Coverage (Footprint) Limit (max.)	35% (i.e., min. 65% open space)	40% (i.e., min. 60% open space)	5% greater building coverage allowed
ADUs	Permitted Use (attached), Conditional Use (detached)	Permitted use (attached and detached)	Conditional v. Permitted for detached; no difference for attached
Rear Yard Buildings	Not Allowed	Allowed	FR-3 more restrictive
Density Limit (Single Family Residential)	3.63 du/ac	8.7 du/ac	5.07 du/ac
Density Limit w/ADUs	7.26 du/ac	17.4 du/ac	10.14 du/ac
Grade Change Limits	<ul style="list-style-type: none"> Buildable area: Up to 6'; no limit for below grade structures Side/rear: No limit, 6' retaining wall height limit. 	Buildable area: No limit Side/rear: No limit, must be stepped 3' horizontal per 4' vertical	Buildable area more restrictive in FR-3; Setback areas less restrictive in FR-3

As shown above, the zones regulate development similarly, but primarily differ in lot size/density and setbacks, particularly the rear. Rear setbacks differ with a blanket 35' required for any lot in the FR-3, but a varying requirement in SR-1 that maxes out at 30 feet. For a 100' lot, the SR-1 zone would require a 25' deep rear yard. Front setback requirements are the same at 20' or the average of the block face. Density differs more significantly, with the SR-1 requiring 5,000 square feet (roughly 1/10th acre) per lot for single-family homes and the FR-3 requiring 12,000 square feet (roughly 1/4th acre) for a single-family home.

Other regulations, such as building coverage, are similar between the two zones. Building coverage is similar, with 35% of a lot allowed to be covered by buildings in the FR-3 zone and 40% allowed in the SR-1 zone. Front yard setbacks are the same in each zone. The SR-1 generally has smaller setbacks for side yards, resulting in generally 14' of setback between homes, rather than 20 feet.

Diagrams showing the required lot size, lot width, and required setbacks are below to provide a visual comparison for a typical lot in each zone.

Diagram of Lot Size and Setback Requirements - FR-3 & SR-1

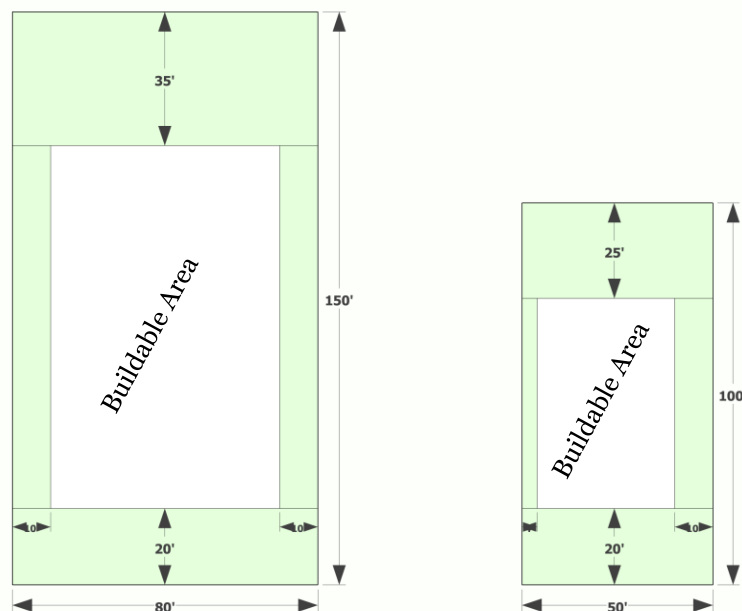


Diagram of minimum lot size and setbacks of the FR-3 (left) versus SR-1 (right) zones

Applicable Review Processes and Standards

Review Processes: Zoning Map Amendment, Master Plan Amendment

Zoning Map Amendment/Master Plan Amendment: Zoning map amendment proposals are reviewed against a set of considerations from the Zoning Code. The considerations are listed in [Attachment G](#). Generally, Planning Staff is required by ordinance to analyze proposed zoning map amendments against existing adopted City policies and other related adopted City regulations, as well as consider how a zoning map amendment will affect adjacent properties.

However, ultimately, a decision to amend the zoning map is up to the discretion of the City Council.

For reference, the standards of review are listed below and are addressed in more detail in [Attachment G](#) and the Key Considerations section:

1. Whether a proposed map amendment is consistent with the purposes, goals, objectives, and policies of the City as stated through its various adopted planning documents;
2. Whether a proposed map amendment furthers the specific purpose statements of the zoning ordinance;
3. The extent to which a proposed map amendment will affect adjacent properties;
4. Whether a proposed map amendment is consistent with the purposes and provisions of any applicable overlay zoning districts which may impose additional standards; and
5. The adequacy of public facilities and services intended to serve the subject property, including, but not limited to, roadways, parks and recreational facilities, police and fire protection, schools, stormwater drainage systems, water supplies, and wastewater and refuse collection.

There are no specific standards for a master plan amendment. However, Staff generally considers the same considerations required for a zoning amendment and takes into consideration other related adopted City policies and current best planning practices. A decision to amend a master plan is ultimately up to the discretion of the City Council.

Community Input and Public Process

Initial Zoning/Master Plan Amendment Proposal - May 2020

Initial notification of this proposal was sent out in May 2020. This included notice to the local Greater Avenues Community Council (GACC) and to surrounding properties within 300 feet of the property. The applicant has attended multiple GACC meetings since that time. Information about the rezone request was posted on a City Open House website for public review. The applicant was originally requesting the FB-UN1, Form Based Urban Neighborhood 1, zone and was proposing 25 single-family homes with accessory dwelling units in a concept plan.

In the initial notice period and through the end of 2020, Planning staff received about 175 letters/e-mails opposed to the proposal and received signed petitions from over 2,000 individuals opposed to the proposal. Staff received 9 letters in favor of the rezone. All of this input is available in [Attachment K](#).

Updated Proposal and Secondary Noticing – February 2021

At the end of January 2021, the applicant submitted an update to their request. The update provided supplemental supporting documentation for their request and amended their concept site plan from 25 lots to 20 lots. This material was sent to all persons who had provided staff with their e-mail addresses as well as the community council and 45 days were provided for additional input on the updated materials. Staff received about 190 letters in opposition in response to the updated proposal. Four letters were received in favor of the rezone.

Updated Proposal, Third Revision – March 2021

In March 2021 the applicant provided an update to their proposal, changing their zoning request from the FB-UN1 zone to the SR-1 zone, which is a less intensive residential zone. The applicant also provided an updated concept plan with revisions modifying and clarifying proposed

setbacks and heights. This information was posted online and e-mailed out to all persons who provided e-mailed input on the proposal, including the community council. The GACC provided an additional letter in April, noting an additional vote was held with the majority opposed to the request.

Additional Applications and Fourth Revision – November 2021

The developer submitted Planned Development and Subdivision applications in late 2021, which were deemed complete in November. This information was again posted online and also e-mailed out to all persons who had provided e-mailed input on the proposal, including the community council. Staff received about 276 e-mailed comments in response with 272 opposed and 4 in support.

Additional details about the community input and public input process is located in [Attachment H](#). Staff received a very high level of public comments on this proposal. Staff has attempted to capture the key concerns that were brought up in multiple letters. However, please note that not every concern has been captured and addressed here. Please see [Attachment K](#) for the full public comments. Two recognized community organizations cover the Avenues – the Greater Avenues Community Council and the Preserve Our Avenues Zoning Coalition. They both have submitted letters and materials in opposition to the rezone and those are located in [Attachment K.1](#).

KEY CONSIDERATIONS:

The below considerations were identified through the analysis of the proposal, community input, and the zoning amendment consideration standards:

1. [Proposed Zone Potential Effects on Adjacent Properties](#)
2. [Zoning and Density Context](#)
3. [Avenues Master Plan and Citywide Housing Policies](#)
4. [Gentrification and Displacement with Rezones](#)
5. [Proposed Development Plans](#)
6. [Public Comments and Concerns](#)

Consideration 1: Proposed Zone Potential Effects on Adjacent Properties

Summary:

- Zoning amendment considerations include how an amendment will affect adjacent properties
- FR-3/SR-1 zones primarily differ in density (min. lot area), lot width, and rear setbacks
- Rear setbacks and rear accessory structure allowances differ
- SR-1 zone may allow development closer to the FR-3 property, staff recommends condition imposing 30' rear upper-level setback and rear accessory building prohibition
- Density brings additional traffic, traffic study shows limited impact

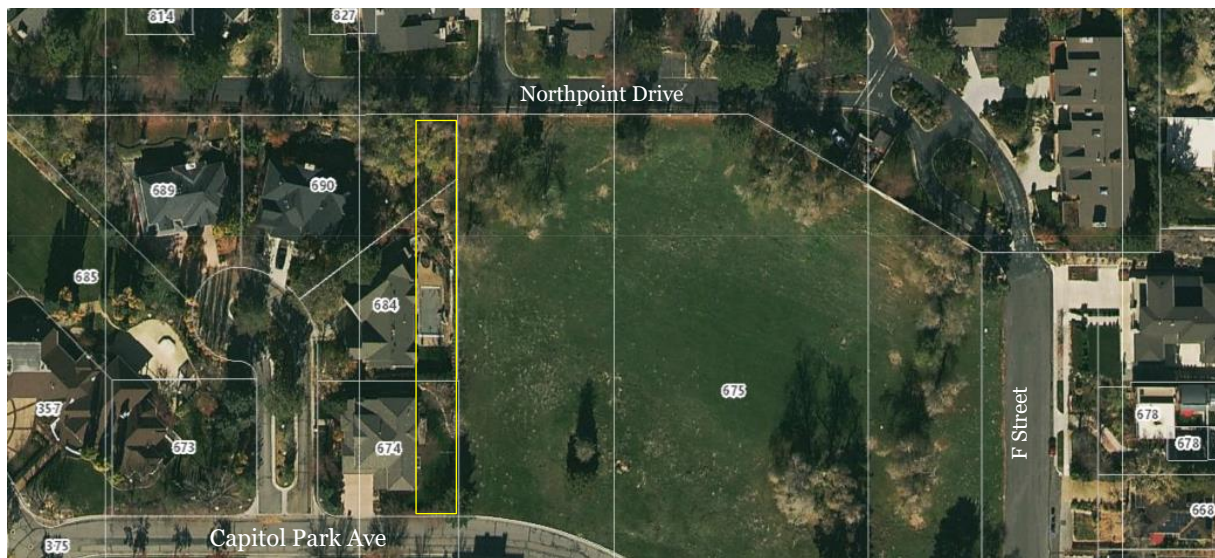
Discussion:

Part of the review for a rezone involves evaluating how a rezone may affect adjacent properties, or in other words its compatibility with adjacent properties. This includes reviewing the impacts setbacks, density, or height may have on adjacent properties in comparison to what would be currently allowed with the current zoning. While many of the regulations are similar between

the two zones, the most significant differences are requirements for minimum lot area (density), minimum lot width (impacts practical density), and rear setback regulations.

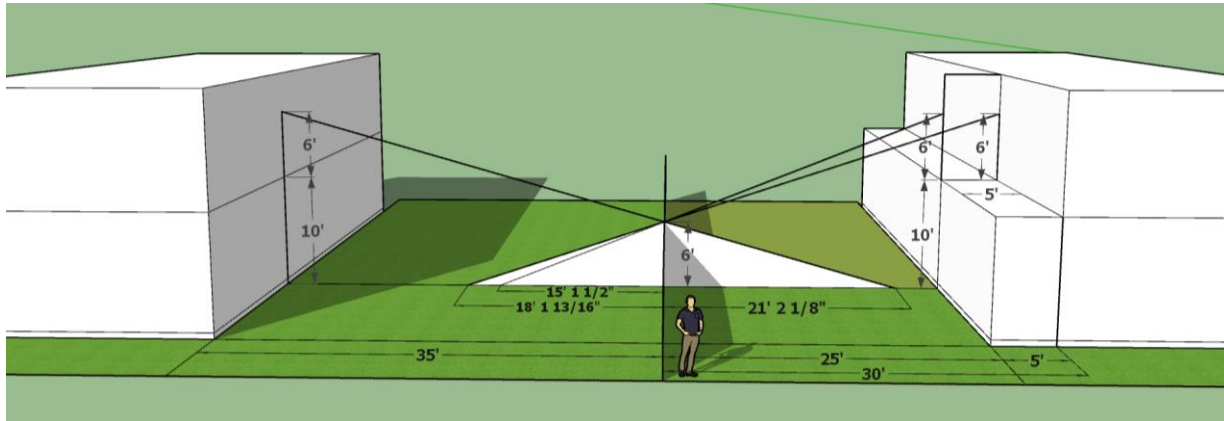
Rear Setback Difference

The difference in rear setbacks with the SR-1 zone may have an impact on the adjacent properties to the west as the property directly abuts those FR-3 properties. The FR-3 requires a 35' rear setback for any lot regardless of its depth, whereas the SR-1 zone requires a setback of 25% of the lot depth, with a minimum of 15' and maximum of 30'. A 100' deep lot, which would be typical with the zone's dimensional requirements, would require a 25' rear setback in the SR-1 zone. This difference would allow homes to be built closer to rear property lines than would otherwise be allowed by the FR-3 zone.



The area bounded by yellow shows the required 35' deep private rear yards of the adjacent properties on the west. Adjacent to the north property line is a private street for the adjacent townhome community.

A 25' setback can provide a similar level of rear yard privacy and sense of openness as a 35' setback, particularly if there is a solid fence. However, second levels of structures can have more of an impact to privacy and that sense of openness than lower structures. To avoid potential compatibility issues Staff recommends a condition that any second levels located next to a rear yard be setback at least 30' from the western property line. The north property line does not have the same rear yard incompatibility potential, as the adjacent property is occupied by the townhome development's access road rather than private yards that would have a greater expectation of privacy and openness.



The above diagram shows the potential visibility of a rear yard from a second story on a typical 100' deep property with a 6' tall solid fence. The difference in obstructed visibility between a 35' setback and a 30' setback is about 3' of depth (~18' vs 21') measured from approximate eye-level at 16' above the ground (a second story window). This does not account for any trees or grade differences that can also impact visibility.

Another difference between the associated zones is that the FR-3 zone does not allow accessory buildings within the rear 35' setback, whereas as the SR-1 does allow such accessory buildings in the required rear setback. This could be a compatibility concern along the western property boundary where there are private rear yards with no expectation of any immediately adjacent buildings along the property line. To limit compatibility concerns, Staff recommends a condition prohibiting accessory buildings in rear yards located along the western property line. If conditions are adopted by the Council, the Council can choose the best method to ensure those conditions are met. One of those options could be with a development agreement.

Traffic from Additional Housing Units

The proposed zoning would allow more lots and units based on its lower lot area and lot width requirements. Additional density/housing units generally includes more vehicle traffic, which can have impacts on adjacent streets. In response to this consideration and concerns, the developer provided a traffic study to analyze the amount of traffic that would be created by the proposed density and its impact on adjacent streets. That study is in [Attachment B](#) and discussed in more detail in [Consideration 6](#). In general, it determined there would be a very limited impact. The traffic study analyzed the impact of 35 total dwelling units, which aligns with the practical maximum number of dwellings that could be built without special Planned Development approval.

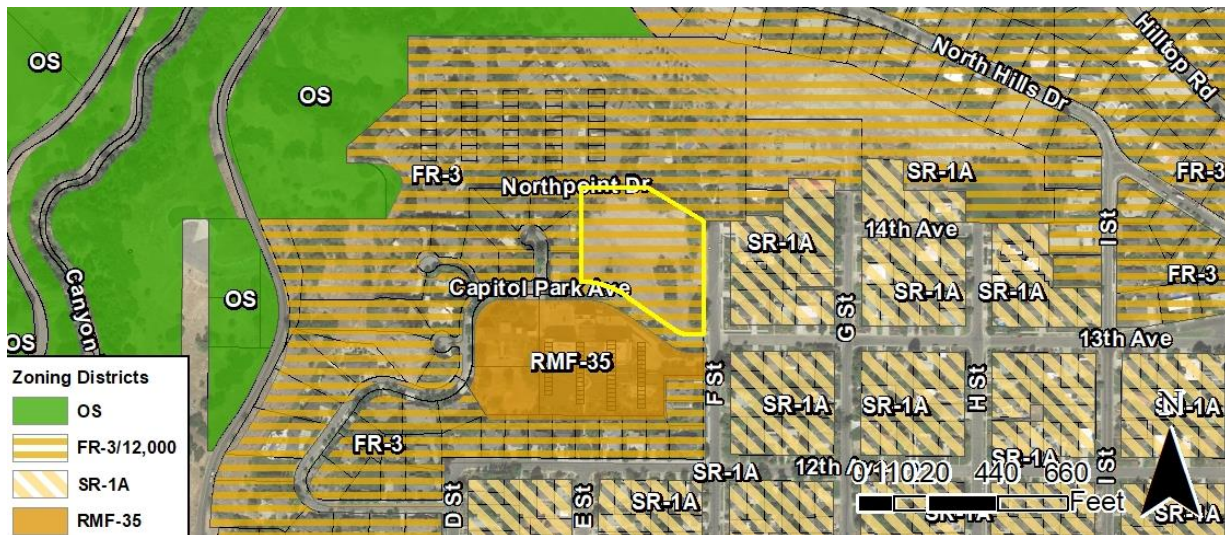
Concerns were also received regarding the potential for additional accidents from additional traffic. Based on the limited amount of additional traffic and the existing accident rate, Staff does not anticipate a substantive impact on traffic accidents or traffic safety. Staff has included an accident map for the area along F Street in [Attachment J](#) using recent available years of traffic accident data. This data is also discussed in more detail in [Consideration 6](#).

Consideration 2: Zoning and Density Context

Summary:

- SR-1A zone (sister to SR-1) mapped over most of the “lower” Avenues (below 13th Ave), with identical regulations, excepting height (25' v 28') and accessory structure size
- Nearby SR-1A properties are generally not developed to their maximum allowed density
- Property is proposed for development (in concept) and would likely develop with the rezone at a higher density than existing surrounding properties
- The proposed density is found in the Avenues and in many places compatibly co-exists with lower density properties

Discussion:

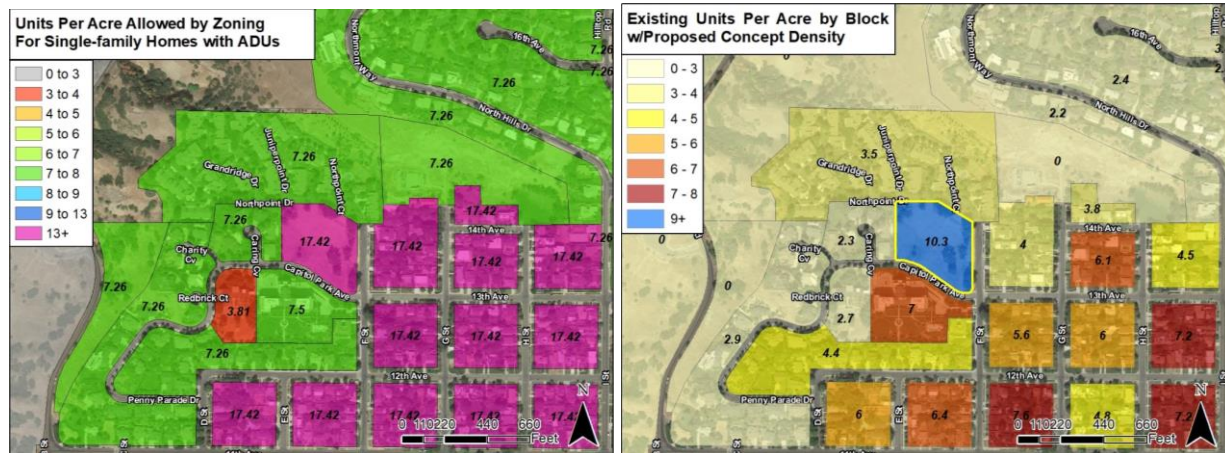


The SR-1 zone's sister zone, SR-1A, is mapped over the blocks to the east and south-east of the site. It generally covers most of the lower Avenues below 13th Avenue. The zone directly interfaces with the FR-3 zone in a few different nearby areas. For example, 12th Avenue includes FR-3 zoning on its north side and SR-1A zoning directly across the street. This also occurs on 11th Ave between B and D Street, as well as along 13th Avenue and on I Street.

The SR-1A zone has the same regulations as the SR-1, save for a slightly lower height limit (25' versus 28') and lower accessory structure size allowances. The subject site and the adjacent properties on the east would essentially have the same zoning save for those differences.

Although the zoning of the block to the east is virtually the same as that proposed for the site, the east properties were not developed to their maximum development potential. The lots are a mix of sizes, ranging from ~4,700 sq ft to ~33,000 sq ft and do not currently include ADUs. Because of that, if the subject property is rezoned, it will likely be developed at a higher density than that block.

For context, maps showing the maximum allowable density per zoning and the existing built densities of the surrounding blocks are below.



The left map shows the maximum theoretical densities of the “blocks” in the area based on the zoning alone, which are not necessarily realistic. Some blocks are broken up where the zones differ or where there are development agreements in place that limit density on a particular parcel (e.g., the Meridian at 7.5 du/ac and the Annex at 3.81 du/ac). The map on the right shows existing built number of units on the blocks. For comparison purposes, the map shows the density of the concept plans (10.3 du/ac) on the subject property. If the custom homes on F Street include ADUs, the density would be 11.8 du/ac. Please note that some of the built density calculations would be up to 1 du/ac higher if private streets areas were excluded from the calculation, which would impact the calculations for the subject site, Meridian, and Northpointe. Larger versions of these maps are in [Attachment J](#).

The highest current built densities in a two-block radius of the site are the Meridian condominiums at ~7 dwelling units an acre and a nearby SR-1A zoned block built at ~7.6 dwelling units an acre. The developer’s concept plan would exceed these levels at ~10.3 dwelling units an acre, which is around the same practical density maximum that could be built without special discretionary approvals from the Planning Commission. There are examples of blocks with density levels similar to this in the general area.

Examples of similar density include three blocks located south of the site on 10th Avenue. These blocks range from ~10 to ~11.6 dwelling units/acre. Two of these blocks were associated with Planned Unit Developments where the normal setbacks were consolidated into larger common spaces similar the applicant’s proposed development. This level of density is generally compatible with other low-density development in the Avenues, with a low level of vehicle traffic and low scale buildings.



Aerial showing density values of blocks located four blocks south of the site on 10th Avenue. These blocks are zoned SR-1A.

Beyond these blocks, there are several other areas of the Avenues where single-family homes co-exist generally compatibly with much higher density single-, two- or multi-family development. A larger map of the built densities of the Avenues is included in [Attachment J](#) showing several blocks that meet or exceed the proposed density adjacent to much lower density development. The density proposed and possible with the rezone is not unprecedented in the Avenues and can be compatible with the surrounding development, despite being more dense, due to the similar scale regulations.

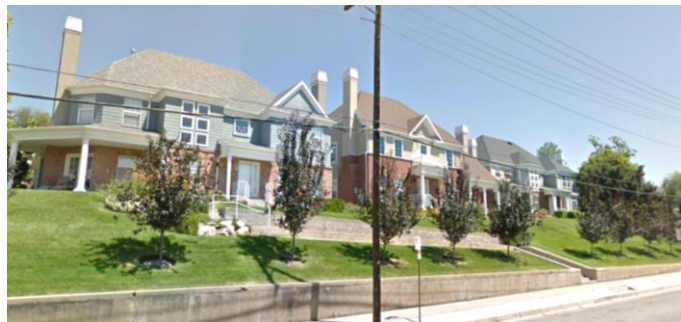
The Zoning Ordinance defines compatibility as the “capability of existing together in harmony.” Generally, Staff believes the SR-1 zone can exist together in harmony with the surrounding neighborhood, as it is a “low-density” zone, with similar development regulations as the surrounding low and very low-density zones. And as further precedent, the SR-1A zone with similar regulations is mapped over most of the residential development in the Avenues, and directly interfaces with the FR-3 zone on multiple nearby streets without compatibility issues.



Photo of 10th Avenue just north of F Street showing townhome development on the left with a 11.6 units/acre density and homes on the right with a 7.6 units/acre density. Credit: Google Street View



This predominantly single-family home block at the corner of F Street and 9th Ave has a density of 10 units per acre. Credit: Google Street View.



This block at 10th Ave and D Street has a density of 10 units per acre and includes duplexes designed to look like single-family homes. Credit: Google Street View

Consideration 3: Avenues Master Plan and Citywide Housing Policies

Summary:

- Avenues Master Plan (1987) calls for “very low density” on the Future Land Use map and supports larger lot sizes in “foothill” areas
- Avenues Master Plan text calls for “low density” development on the property
- Growing SLC (2018), the City’s current housing plan, includes citywide policies to increase housing options and types of housing throughout the City
 - Support in-fill development and modifying zoning regulations when appropriate and where it can be compatible in scale

- Citywide policies support amendment to Avenues Master Plan and zoning given broader city goals, changed conditions, the low level of density proposed, and its compatibility potential

Discussion:

The applicant is seeking an amendment to the Master Plan, as the current 1987 Avenues Master Plan calls for “very low density” development on the subject property, and the proposed SR-1 zone is a “low density” zone rather than a “very low density” zone.

The proposed zoning change is required by City ordinance to be analyzed against all adopted City policies, which includes not just the 1987 Avenues Master Plan but the City’s more recent Citywide housing plan and Citywide general plan. Staff analyzes both the zoning amendment and master plan amendment against these policies. Staff has compiled policies related to the rezone from all adopted City policy documents in [Attachment F](#). These policies are extensive, and so some, but not all, of these policies are discussed below.

In general, the Avenues Plan text supports very low to low density development in the upper areas of the Avenues, particularly those considered to be in the “foothills.” Reasons for that include to preserve the appearance of the foothills, preserve undeveloped natural areas, avoid a “congested” appearance, and limit traffic impacts to the lower Avenues. The Future Land Use map in the plan specifies that the property be “very low density” and the text of the plan specifies that the property should be “low density” where it refers to redevelopment of this specific property (as a part of the former BYU Education Center). The proposed zone is a low-density zone, so while not consistent with the “very-low” designation in the future land use map, it is generally consistent with the low-density residential policies for the specific area in the text. However, it isn’t generally consistent with the foothill specific policies, which generally support large lots and very low-density development.

The City’s citywide housing policies in the Growing SLC plan support additional density throughout the City and are intended to increase the overall amount of housing and ensure that the City maintains low- and moderate-income housing throughout the City. The plan recognizes that by limiting new housing development, this puts price increase pressure on housing across the spectrum as demand increases. The plan includes a number of policies that support finding opportunities for additional housing in ways that can still maintain compatibility with neighborhoods. This includes supporting zoning changes that would support more housing options and additional housing types, such as ADUs and duplexes. The plan itself identifies large minimum lot size requirements, in particular those over 10,000 in size, as a significant barrier to providing additional low scale housing in the City. Related to that, the property is currently zoned with a requirement for minimum lot sizes of 12,000 square feet but is adjacent to zoning that only requires 5,000 square feet for a single-family home.

Plan Salt Lake, the City’s citywide general plan, also includes policies that support additional housing and housing types throughout the City. The plan notes that “over the next 25 years, it will be critical for us to encourage and support a diversity of new housing options and types with a range of densities throughout the City to best meet the changing population.” It also supports “infill and redevelopment of underutilized land” and notes that the City should “accommodate and promote an increase in the City’s population.” It does this while also stating that the City should “maintain neighborhood stability and character.”

Considering those policies overall, Staff believes the proposed minor to moderate increase in density is warranted, as the proposed zoning change would allow for additional housing while still generally being compatible with the surrounding property due to its lower level of density and scale. Conditions have changed since the Avenues Master Plan was adopted in 1987, with housing demand and availability changing significantly and the City adopting broader housing policies aimed at providing more housing in general to help address changed market conditions. There are likely multiple factors in housing price increases, but demand is a significant one. Not responding to significant demand with corresponding supply increases will likely result in further price increases across the housing market spectrum and this will increasingly price out even middle-income earners from living in the City. Given this, Staff believes adjustments to zoning are necessary in light of changed conditions and changes in public policy. Rezoning the property to the SR-1 zone will help achieve City housing supply goals, while still generally maintaining compatibility with surrounding development, related to heights, open space, and setbacks, and having minimal traffic impacts.

Consideration 4: Gentrification and Displacement

Although not extensively addressed in current City plans, gentrification and displacement have received increased attention in recent years due to increased new development, particularly in lower income areas. The City is working on plans and policies to address those concerns. Rezones are often requested for properties that consist of existing lower-income affordable housing and so the zoning change is associated with the potential to displace people with lower incomes. This property is unique in being a sizeable vacant property that can accommodate in-fill development without displacing any existing residents. It will also not result in the loss of any existing homes that contribute architecturally to the character of the neighborhood, which could happen when properties with existing housing are up zoned. Further it is in an area of the City with generally high opportunities, measured by access to services, such as schools, grocery stores, parks, libraries, and jobs, making it a good location for new residents and families.

Consideration 5: Proposed Development Plans

The applicant has submitted Planned Development and Preliminary Subdivision petitions to the City that may come before the Commission at a later date. The applicant's narrative and full-size plans are located in [Attachments B](#) and [C](#). They are provided in the report to provide context regarding the reason for the applicant's requested rezone and context for many of the public comments.

The plans require additional details to ensure they comply with zoning height regulations before they can be reviewed by the Commission. This will likely require changes to some of the home designs to comply with overall building height limits, which cannot be modified through the Planned Development process. As currently depicted, the plans would require relief from regulations on lot dimensions, lot coverage, lot frontage, setbacks, grading, and wall heights.

Development Proposal Facts

- **19** total single-family home lots
- **14** homes on the proposed private street will include ADUs
 - Homes will include 3 covered parking stalls (1 for ADU, 2 for SFD)
 - Min. 20' depth driveways
 - Avg. lot size 6,800 sq ft
- **5** homes on F Street will be "custom homes" – no specific plans. May include ADUs.
- **1** private park lot (17,432 sq ft/0.4 acre)
- **Average Lot Size (Overall):** 7,355 sq ft
- **Density:** 5.9 units per acre (Single-family units only)/10.3 units per acre (single-family + ADUs)



Landscape plan for the development showing the site configuration. A full-size copy is in [Attachment C](#).

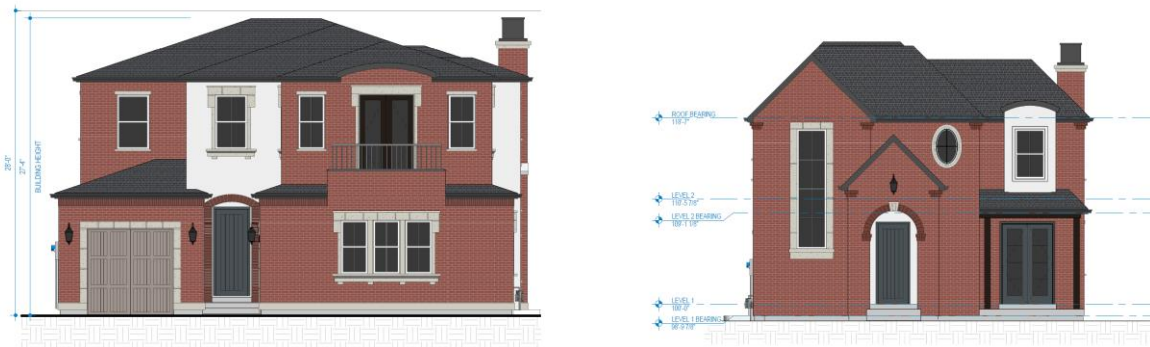
The following modifications to the normal zoning ordinance regulations are currently included as part of their Planned Development request, and are based on the proposed SR-1 zone:

- **Lot Frontage:** 14 lots will only have frontage on a private street, rather than a public street.
- **Lot Size:** 3 internal lots under the minimum size of 5,000 sq ft
- **Lot Width:** 4 internal lots are under 50' width requirement
- **Lot Coverage:** 5 lots exceed coverage limit of 40%. Overall development is at ~30% building coverage or 70% open space.
- **Front Setbacks:** Reduction for internal lots to generally 10'
- **Side Setbacks:** Setback reductions for lots, generally from 14' (10' on one side, 4' on the other) to 10' (5'/5').
- **Rear Setbacks:** ~21' along west property boundary (normally ~25'), ~10' along north boundary (requirement varies, but normally ~23'). Internal facing rear setbacks vary but are below the minimum 25% depth requirement - from 5' (internal lots) to 18'/20' (F Street facing lots).
- **Wall Height:** Additional building wall height (over 20' max) along some side yards where lots slope.
- **Grade Changes/Retaining Wall Height:** Grade changes over 4' in setback areas. The request varies across the site. Changes are normally limited to 4 feet in setback areas in the proposed SR-1 zone and must be stepped every 3' horizontally every 4' of vertical wall height. Associated retaining walls are limited to 4' in height but are proposed to be greater, with varying heights. Grade changes over 4' are allowed in the buildable area without stepping.

Concept Plan Layout and Elevations



The applicant's landscape plan is above showing the proposed site configuration.



The elevations of the proposed homes are above. The design on the left corresponds with the beige-colored homes shown on the landscape plan above and the design on the right corresponds with the olive-colored homes. The homes along F Street (shown in yellow on the landscape plan) are proposed to be custom homes and no elevations are included.

F Street Lots

There are five "custom home" lots proposed on F Street. As custom homes, these may or may not ultimately have an ADU. Front setback modifications are not requested, but side and rear modifications are being requested. The five lots have an average lot size of 6800 square feet and have lot widths ranging from 66' to 99'.

Internal Private Street Facing Lots

Outside of the five custom homes along F Street, there are 14 lots, a private street, and a common open space area or private park on the remainder of the property. Each of the internal lots are proposed to include a single-family home and an internal ADU. The internal lots do not all meet zoning width or area requirements of the proposed SR-1 zone but calculated overall would meet lot area requirements on an average basis, with an average lot size of 6,800 sq ft (including roadway and open space). Internal front, rear, and side setbacks between the homes generally do not meet SR-1 minimums.

Building Coverage

Not every lot individually meets the lot coverage maximum of 40% (i.e. up to 40% of the lot may be covered by buildings), but the development overall complies, with approximately 30% of the property being covered by buildings. This is in part due to the large private park/common open space proposed for the site. Excluding the park, the lots have a building coverage of about 37%.

Private Street

As the applicant is also proposing to develop those lots with access from a private street, rather than a public street, the development is required to go through a Planned Development process. This process is required for all developments with lots on private streets and was also the process by which the lots on Capitol Park Avenue and the adjacent cul-de-sacs (private streets) were approved.

The primary physical difference with private streets versus public streets is the total width of the street. Generally, for single-family home cul-de-sac streets, the City requires a minimum paved width of 30 feet, with 6" vertical curb and gutter, park strip, and sidewalks on one or both sides. The plan proposes a 26-foot-wide internal private street with sidewalk on one side. Sidewalks are also shown on F Street and Capitol Park Avenue.

Public Concerns with Planned Development

As the Planned Development is not under consideration at this time, Staff has not addressed Planned Development specific concerns in this report. However, all of those concerns are included in the public comments section as there is cross-over in the comments and concerns with the zoning amendment request. Concerns with the zoning amendment itself are located in the Key Consideration section below. Some of the most frequently received concerns in the public comments pertaining to the Planned Development request include concerns with the grade changes, retaining walls, setback reductions, loss of trees, amount of open space, emergency vehicle access, on-street parking, snow storage, trash pick-up, and meeting Planned Development objectives.

Consideration 6: Public Comments and Concerns

Staff received hundreds of e-mails with comments and concerns about the proposal. Staff has identified a variety of key recurring concerns below. Concerns more specifically related to a specific standard of review are addressed elsewhere in this report in the analysis of the applicable standard. Concerns specifically related to the Planned Development or Subdivision are not addressed here and will be analyzed when that proposal comes to the Commission.

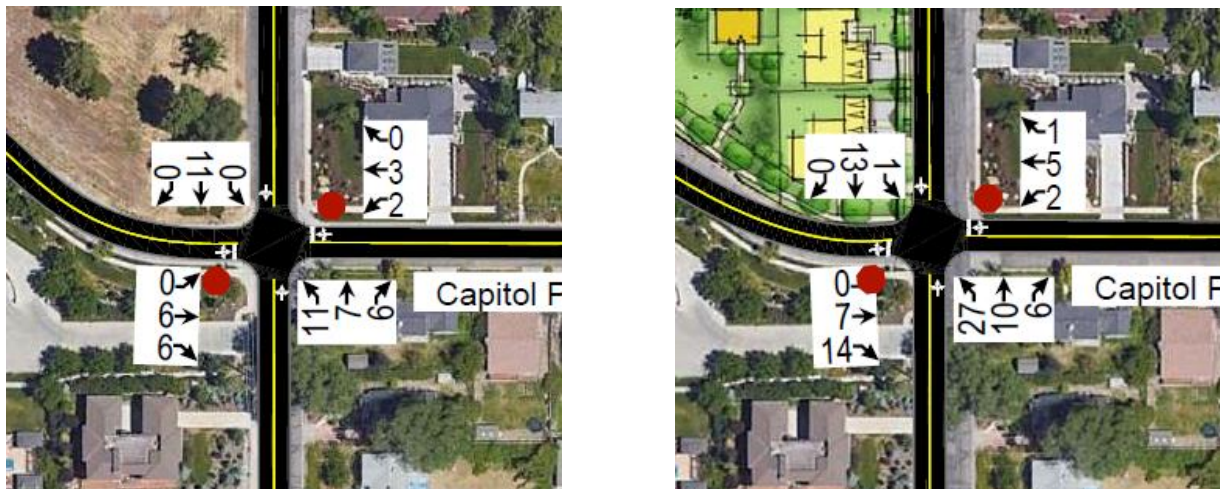
Accessory Dwelling Units and Short-Term Rentals

Concerns were provided that the ADUs could be used for short term rentals. Both the current FR-3 and proposed SR-1 zone allow for ADUs. Their occupancy and use is still regulated by City ordinances that require owner occupancy of the primary home and minimum 30 day rental periods. Short term daily or weekly rentals are not allowed. State Code was also updated recently with additional enforcement mechanisms for cities to better ensure that ADUs will not be used for short-term rentals.

Traffic Impacts

Potential impacts on traffic were brought up in many public comments. In response, the developer provided a traffic study to determine the traffic impacts of their potential development, assuming a 20-lot development with 15 ADUs. Though this is lower than the theoretical maximum development potential allowed of the proposed zone, Staff believes the traffic impacts would be similarly limited at maximum development potential given the study's analysis and conclusions. The amount analyzed is similar to the maximum practical density possible for the site (estimated at 18 single-family home lots with) without a special discretionary approval process to modify lot regulations.

The study showed that the nearby controlled (stop signed) intersections currently function at an “a” and “b” “level of service,” meaning “free flow/insignificant delay” of <10 seconds, and “Stable Operations/Minimum Delays” of up to 10 to 15 seconds, respectively. The study determined there would not be a change to the level of service of each controlled roadway intersection, with less than a second of delay added to intersection wait times at peak hours, and the project providing “negligible impact on traffic operations of the surrounding area.” See page 11 of the traffic study in [Attachment B](#). The Transportation division reviewed the study and did not have any concerns with its analysis or conclusions. Staff has included extracts from the report below for comparison purposes.



The above images from the traffic study show the F Street and Capitol Park/13th Ave intersection at “Evening Peak Hour” (4:45 to 5:45 PM), showing the number of cars doing each turning movement at the intersection. On the left is the existing traffic numbers for the intersection (adjusted for COVID related declines), showing 52 cars over the course of peak hour. On the right is the projected traffic numbers for the intersection with the project built, showing 86 cars over the course of peak hour, an increase of 34 vehicles.



These graphics show traffic during evening peak hour at the 11th Avenue and F St intersection with the existing traffic on the left and projected traffic on the right. The analysis shows 29 additional cars at this intersection over the course of evening peak hour. This is less than 5% of all traffic during this time. The study notes that there would be a negligible impact on the level of service, with no impact to the level of service for this intersection with less than half a second added to the existing 11 second average delay at the intersection at evening peak hour.

Traffic Accidents

Concerns were provided by residents about more traffic, and the potential for more accidents or safety impacts from more residents, particularly on F Street where many vehicles from this development will travel to get to daily activities. There is always a risk of more traffic accidents with more traffic; however, as noted in the traffic study, the amount of additional traffic from additional residences on this site would be small. To help provide perspective on the accident risk, staff pulled available City data on traffic accidents near or on F Street and has attached a map of that data in [Attachment J](#). This map includes “serious injuries” and fatal accidents. From 2008 to 2019, there were two traffic accidents with “serious injuries” on F Street between 13th Avenue to North Temple. Serious injuries generally include injuries more serious than a bump, bruise, or minor cut. One injury involved a pedestrian and a moving vehicle, and one other involved a bicyclist and a parked vehicle. There were no fatal accidents during that time period.

Affordable Housing

Input has been received about the proposed housing that would be developed with a rezoning not including affordable housing and therefore not helping the City’s housing issues revolving around affordability. The developer has indeed not proposed to include income-restricted “affordable housing” units in the project and the homes themselves will likely not be affordable to income levels typically targeted for “affordable housing.” However, any additional housing supply helps address the City’s housing issues. Although not the only driver of price increases, one of the most significant factors impacting housing prices is supply and the lack of supply is driving all housing prices higher. Any buyer of a new home here is one less bidder or buyer of an existing home in the City, reducing pressure on existing lower priced housing stock to increase in price and gentrify.

Also, important to consider is that ADUs, while not necessarily providing “affordable housing” for targeted lower incomes, would still be rented at a lesser amount than a full single-family home in this area of the City. This allows for persons with relatively lower incomes to reside in

a generally high-income area. This is again also one less person competing for other new, high quality rental housing in other, currently more affordable, areas of the City. This similarly applies to the homes overall, with homes developed in the FR-3 zone generally going to be priced higher than homes developed in SR-1, due to amount of land included in each lot and the larger size of homes that would be built.

Air Pollution

Concerns were provided regarding additional pollution that will result from gas fueled vehicles. New residents will generally bring new air pollution as they will likely drive gas fueled vehicles. However, this property is located close to downtown, jobs, and services. Residents with close access to these amenities generally will have lower pollution and carbon impacts than residents in more distant suburban locations. With a growing population, the City can support more residents in already developed areas near jobs and amenities, or new residents will go elsewhere in much more remote undeveloped areas (“sprawl”) where they are much more likely to have higher carbon footprints and pollution impacts.

Public Utility Adequacy

Concerns were received regarding the adequacy of public utilities to serve the property. Utilities did not have any concerns with water or sewer capacities to serve this development. Public Utilities notes in their review that the property can be served, but that the developer will have to install improvements to adequately serve their proposal. This is the normal requirement for any development. Any development is required to make all improvements necessary to adequately serve their development and not negatively impact adjacent service levels.

Fire Department Access and Fire Codes/F Street Width

Public input was received regarding whether fire access will be adequate for the development, including concerns regarding evacuations and wildfires. Planning Staff requested comments from the City’s Fire Prevention Bureau of the Fire Department regarding these concerns. The Fire Department noted that they do not have any official comments or concerns about the zoning change because any development will be required to meet adopted International Fire Codes. Fire Code includes minimum requirements for fire vehicle and firefighter access to properties, including such things as minimum street/drive widths for fire vehicles, maximum building distances from streets, and minimum number of vehicle entry points for a development. The zone change does not waive any Fire requirements that universally apply to all development in the City.

F Street is required to be improved with any subdivision of the subject property regardless of its zoning. This will include new curb, gutter, and park strip. The City standard for local residential streets includes a 36’ wide paved street. This provides sufficient area for parking on both sides of the street and at least 20’ of clear width to accommodate fire vehicles. This meets Fire Code fire vehicle access requirements for the low scale structures in this neighborhood.

Property Value Impacts

In general, most research has shown that new residential development of any density or type (market or even income-restricted) generally does not depress surrounding single-family home property values. A recent local study specific to Utah by the Kem C Gardner Policy Institute found that “single-family homes that were located within 1/2 mile of new apartment

construction realized 1.4% more in annual price appreciation than those single-family homes that were located farther away.”¹ This study and others have theorized that the appreciation is related to new investment in an area increasing the attractiveness and demand to live in an area.

Nesting Bird Habitat

Concerns were provided regarding potential removal of bird nesting sites for any development, including for a red-tailed hawk. Nesting sites are protected by federal regulations that prohibit removal of active nests. The nest and associated tree may only be removed when the nest is not being actively used.

Tree Protection

Trees may be removed under development scenarios with both the FR-3 and SR-1 zone. The front setback requirements of each zone place many of the trees along F Street in the buildable areas of potential lots, which reduce their likelihood of preservation. However, the City has adopted regulations to support preservation of significantly sized trees, by requiring replacement of any significant trees at double the rate of lost tree trunk, or payment of a fee to support later replacement at the same double replacement rate.

School Enrollment and Family-Supportive Housing

Comments were provided suggesting that the proposed change in zoning wouldn't support housing for families with children and would result in further decreases in school enrollment numbers due to not supporting family housing. Most of the City's single-family residential neighborhoods are zoned for 5,000 square foot lots, including most of the lower Avenues. The proposed zone, with the same 5,000 square foot lot requirement, also supports housing with multiple bedrooms and open space/yards that would accommodate families with children. The conceptual homes proposed by the developer are three- to four-bedroom homes and would support families. The City is generally not seeing a lot of this type of development, instead seeing more apartments and townhomes with fewer bedrooms. The open space requirements of both the existing and proposed zones are similar and would result in similar amounts of open space, with the FR-3 requiring 65% open space (35% allowed to be covered by buildings) and the SR-1 requiring 60% open space (40% allowed to be covered by buildings).

DISCUSSION:

The proposal has been reviewed against the Zoning Amendment consideration criteria in [Attachment G](#), including criteria regarding the proposed zoning's impact on and compatibility with adjacent properties, and compatibility with the associated area master plan and City master plan policies.

The proposal will result in more traffic and generally more activity in the area and that will have an impact on the area. However, the proposed zone is still a low intensity, low density single-family zone that will have similar impacts to the existing “very low” density zoning on the site.

¹ Eskic, D. (2021). *The Impact of High-Density Apartments on Surrounding Single-Family Home Values in Suburban Salt Lake County*. Kem C. Gardner Policy Institute. <https://gardner.utah.edu/wp-content/uploads/HighDensity-Feb2021.pdf>

The proposed zone is not introducing a new zone or new development potential to the area, as the proposed zoning matches the zoning across the street and other nearby properties.

Additionally, the proposed zoning supports housing goals for the City by increasing housing supply without eliminating any existing affordable housing or displacing any residents. This is a relatively minor zoning change to accommodate additional housing. While it doesn't align with the current Future Land Use map of the Avenues Master Plan, there are general policies in the City's housing plan and citywide general plan that support such changes to zoning. Staff believes an adjustment is warranted for this property, given those housing policies, the zoning context, changed market conditions, and the low level of density requested.

Due to these considerations, staff is recommending that the Commission forward a favorable recommendation on this request to the City Council, with conditions as noted on the first page of this report.

NEXT STEPS:

Zoning/Master Plan Amendments

The Planning Commission can provide a positive or negative recommendation for the proposed zoning map and master plan amendment. With either recommendation, the recommendation will be sent to the City Council, who will hold a briefing and an additional public hearing on the proposal. The City Council may make modifications to the proposed requests, including adding conditions, and approve or decline to approve the proposed amendments.

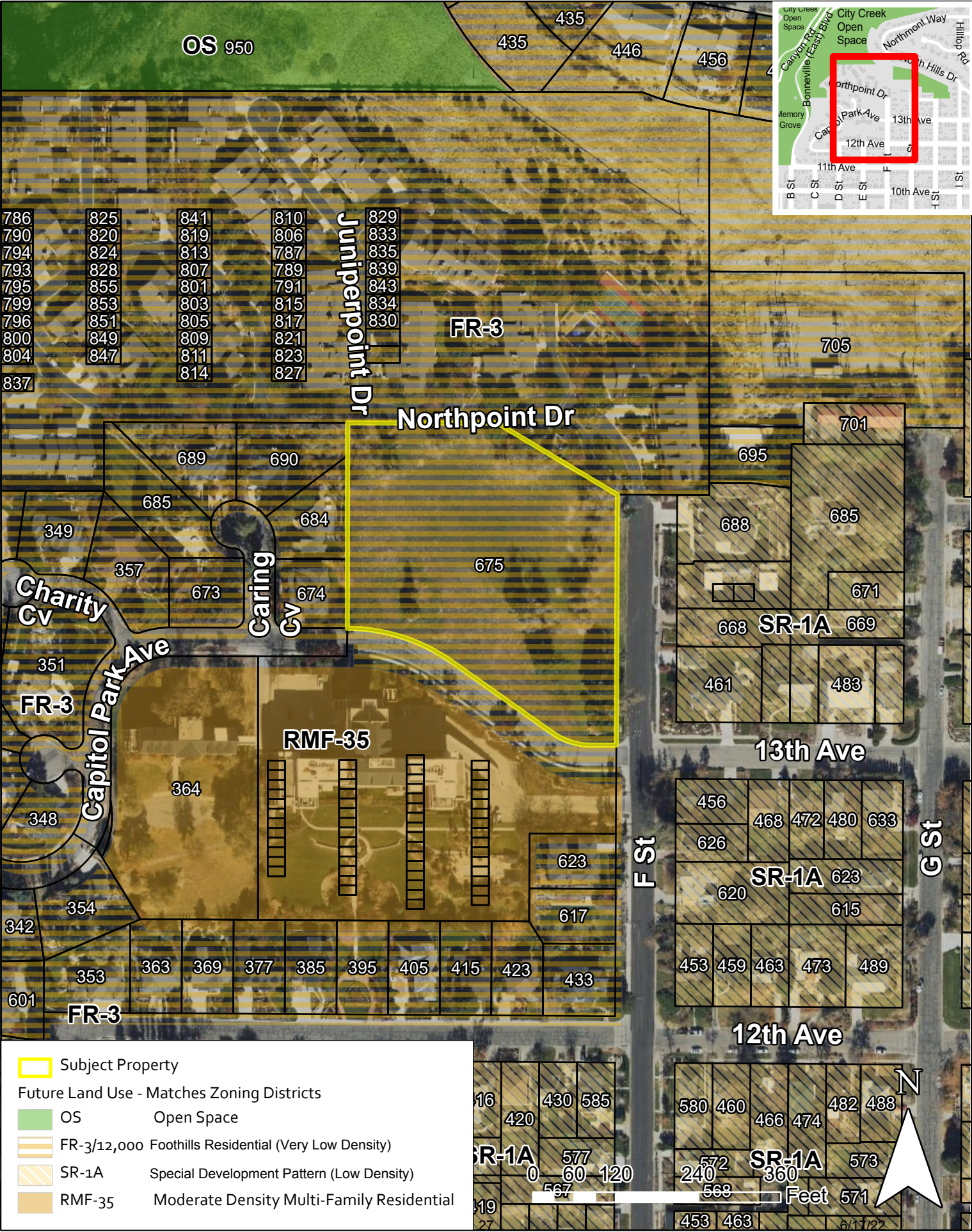
If the zoning map and master plan amendment is approved by the City Council, the property owner could develop the property under the SR-1 zone regulations, which would allow up to 27 lots. The developer could proceed to finish their Planned Development and Subdivision plans for Planning Commission consideration. Alternatively, the property could be subdivided by right with public streets and with no zoning modifications, at likely a lower density than technically allowed by the zone.

If the zoning modification is denied, the property owner could propose development that meets the standards of the FR-3 zone and would be limited to up to 11 lots on the site based on the zone's density limit. Each home could have an internal accessory dwelling unit. The property would likely support less than 11 lots due to public street and lot dimensional requirements.

ATTACHMENT A: **Zoning and Future Land Use Maps**

[illegible]

Vicinity Future Land Use Map



ATTACHMENT B: **Applicant's Narrative and Background Materials**

The applicant's materials include a number of attachments and have their own table of contents. Please note that the applicant's narrative includes an older version of their plans. This section is very large and has been attached in a separate PDF. Please see the Attachment B PDF.

ATTACHMENT C: **Concept Site Plans and Elevations**

This attachment includes the applicant's Planned Development narrative, preliminary conceptual elevations, subdivision plat, grading plans, utility plan, and landscape plan. These are not being decided on by the Commission at this time and are included to provide context for the zoning amendment request. As designed, these plans will require Planned Development review as they involve modifications to regulations for grading, setbacks, and lot requirements. See [Consideration 5](#) for details. A version of the plans may come before the Commission at a later date.

Capitol Park Cottages

Planned Development Application

Background

Capitol Park Cottages is a 3.21-acre vacant property located in the Salt Lake City Avenues neighborhood. The property is the size of an average Avenues city block and is therefore incredibly unique in that it presents an opportunity for a planned development of scale that does not require the removal of historic buildings or encroachment into hillsides. Ivory Development is approaching this residential development in a way that recognizes this scarce opportunity.

The vacant land has a zone that limits its development to nine third-acre estate lots. While developing and building this property with multi-million-dollar homes would be easy for us to do, we see this as an opportunity to do a demonstration project of sorts, designing and building ADUs up front and adding more housing at the same time.

Our housing shortage has remained one of the most serious problems facing the State. Even during the pandemic, the average price of homes in Salt Lake County has increased by thirty one percent in the last year. New homebuyers and even middle-income buyers are being squeezed out of the market with higher costs and less availability. The Kem C. Gardner Policy Institute has estimated that Utah is facing a 50,000-unit housing gap. The only way to alleviate the housing gap is to build more homes and ease the strain on the housing market. New housing projects cannot be relegated to greenfield developments or gentrification of disadvantaged neighborhoods.

Ivory Development seeks to develop Capitol Park Cottages as a community that promotes the precedents already set by the historic Avenues, namely:

- Housing-type variety
- Owner/Renter mix and cohesion
- Family-structure diversity
- Eclectic Architecture
- Progressivism and Innovation

The site plan included with this application has a total of nineteen lots. Five lots fronting F Street provide an opportunity for those wishing to build a custom or semi-custom home that will mimic the existing homes across the street. The interior of the community includes a nearly half-acre park and open space, a private drive and fourteen “Cottage Homes”. The Cottage Homes introduce an innovative approach to new construction as we carefully include an Accessory Dwelling Unit (ADU). ADUs are a market-oriented tool recognized by the *Growing Salt Lake: Five Year Plan* that bring progressive easing to the city’s housing shortage. The ADUs will attract a mix of multigenerational households and renters living cohesively in the same neighborhood.

To pursue this innovative development plan, Ivory has made application with Salt Lake City for a re-zone and master plan amendment (MPA) requesting the SR-1 Zone designation. In conjunction with the re-zone and MPA applications Ivory is submitting a site plan and application for a Planned Development.

Planned Development Purpose and Objective

Capitol Park Cottages meets two critical objectives specifically outlined in the Planned Development ordinance:

- 1. Housing: Providing type of housing that helps achieve the City's housing goals and policies; (21A.55.010.C.2)***

The Capitol Park Cottages Site Plan was designed to facilitate ADUs in new home construction as a distinctive feature.

[Growing SLC: A Five Year Housing Plan](#) 1.1.3 specifically notes that a goal of the city is to “Revise the Accessory Dwelling Unit ordinance to *expand its application* and develop measures to *promote its use*.”

Salt Lake City Planning has published a [Guide to Accessory Dwelling Units](#). In the Overview the Planning Division states, “Accessory dwelling units are part of a range of housing types that can help increase the housing supply with minimal impacts to the scale of an existing neighborhood. This makes ADUs a good option to help provide more housing in parts of the city where other types of housing may be too tall, too wide, or too bulky with the surrounding structures.” (pg. 4)

Salt Lake City Zoning Code 21A.40.200 requires the Planning Division to submit a yearly report detailing the ADU statistics for the year and giving recommendations for potential improvements to the ordinance.

The [2021 ADUs Annual Report](#) was reported to the City Council in February of 2022. The report details that since 2019 there had been a total of 94 ADU applications approved under the ordinance (2019: **33 units** 2020: **34 units** 2021: **27 units**). Of the 94 applications only 7 (2019: **4 units** 2020: **1 unit** 2021: **2 units**) had been in District 3. Despite the approvals only 30 ADUs had been built throughout Salt Lake under the new ordinance. As the [2020 report](#) stated “...*the ADU ordinance is creating more housing choice. It is just doing it at a very slow rate and at a rate that is not making a noticeable impact...*” (pg.11).

The approval of Capitol Park Cottages would provide for a 15% increase in approved ADUs in Salt Lake City and would increase District 3's approved ADU stock by 200%. When Capitol Park Cottages is constructed, its 14 ADUs will outpace the expected city-wide total of 13 new ADUs/year.

Traditional single-family homes, townhomes and apartments are critical in responding to the City's housing unit deficit; however, they are not the only solution. Neither are ADUs. We are

not suggesting that this project will solve the housing crisis. It won't. But it is the cumulative effect of many small, incremental improvements that will ultimately be the solution.

Capitol Park Cottages is not *affordable housing* in that pricing would be fixed outside of market rates by a calculation of area median income. However, through its unique product design the project is inherently equipped with tools for greater housing attainability.

Prospective buyers of the homes will be able to show expected income from rental of the ADUs; qualifying them for more than they would otherwise be allotted. Owners would be able to use the income from the rental to offset their mortgage cost and significantly decrease their percentage of income dedicated to housing.

The ADUs in the project are all one-bedroom apartments which are naturally one of the lowest priced housing types. One-bedroom apartments have sprung up in high and mid-rise complexes, typically owned by large real-estate investment companies, and clustered among other apartment type units. By incorporating one-bedrooms as ADUs affixed to owner occupied homes, rental income is distributed as individual household investments. Furthermore, the ADUs invite an integrated neighborhood in that owners live side by side with renters, promoting cross-demographic relationships and community.

While the social and individual benefits of ADUs is wide ranging their implementation has been narrow and limited. ADUs have customarily been retrofitted to existing homes and lots. Retrofitting involves challenges with regard to design, construction, infrastructure, parking and financing; all of which stymie greater adoption of ADUs.

ADUs as part of a newly built neighborhood allow us to plan for those challenges and make this community blend into the surrounding neighborhood. Capitol Park Cottages can set a precedent for future builders and developers to consider adding in ADUs when constructing a new home.

Furthermore, financing and costs continue to be a constraint to adding more ADUs to existing neighborhoods. It is noted that the cost of additional utilities can be prohibitive, but in our case it simply is not. We are already going to be installing new sewer, water, power, and gas, so the incremental increase to infrastructure is minimal at best.

***2. Open Space and Natural Lands: Inclusion of community gathering places and playground facilities...Clustering of development to preserve open spaces.
(21A.55.010.A.1&6)***

The project site has been designed in a manner to cluster development through reduction of private lot sizing and typical building setbacks. By concentrating the buildable areas, the project is able to incorporate a large open green space that will be programed for the communal use of the residents.

In designing any development, considerations include balancing indoor vs. outdoor areas, private vs. community areas, and general massing and spacing. Much like diversity in housing types, diversity in community designs can cater to and encourage different lifestyles and modes of social engagement.

Two different community designs are present in the neighboring communities of Capitol Park Estates (western neighbor) and the Meridian Condominiums (southern neighbor). Capitol Park Estates (FR-3 zone) is designed with large estate homes on sizeable private lots. Nearly all outdoor spaces are private, fenced, and residents have built private pools, patios, and outbuildings in their yards. On the opposite end of the design composition is the Meridian Condominiums (RMF-35). As a condominium complex, private outdoor spaces are limited to balconies, while outdoor spaces are common areas and include a large community pool and vast manicured lawns.

Capitol Park Cottages is designed rather as a balance between the poles present in its western and southern neighbors. Each lot in the project has a modest private outdoor space that provides outdoor living and entertainment opportunities. Beyond the private yards, a community open space is available that will include landscaping and a children's playground facility.

The open space area is .4 acres (17,432 SF) in size. By reducing minimum private yard spaces in certain lots (by an average of 525 SF), a large community open space is created that offers recreational and community gathering opportunities that would not be feasible on typical 5,000 SF lots.

Each community design and private/common area balance has a place in the Avenues and is important to providing for a diversity of lifestyles and family needs. At Capitol Park Cottages we plan to provide for a community that will have great living spaces for families of all types, ages, and compositions.

Consistency with Avenues Master Plan

There is a Master Plan Amendment Application running concurrently with the Zone Amendment and this Planned Development application.

The Master Plan Amendment seeks to align the requested zone change with the Avenues Master Plan (AMP) redesignating the Capitol Park Cottages property from FR-3/12000 to SR-1.

The property is adjacent to the historic Veterans Administration Hospital and was designated as a foothill preservation zone and the Future Land Use Map assigned the property as VLD (1-4 Units/Acre). The entire surrounding area was designated as LD (4-8 Units/Acre).

The present features of the property and neighborhood have changed significantly over time. Today the historic hospital property has been rezoned RMF-35 and was converted into the Meridian Condominiums, a five-story condominium building. Directly across the street to the east is the historical avenues block pattern, to our north is Northpoint, a 49-unit townhome community and finally to our west, Capitol Park Estates, a large lot home development.

The Master Plan Amendment would align the property's land-use with its actual current conditions and the original intent of the 1987 Future Land-Use Map. That is, to reserve VLD-FR zoning to the bordering foothills and to maintain LD zoning in the historical avenues block pattern.

(Exhibit "A" 1987 Future Land-Use Map)

Compatibility with the surrounding neighborhood

Today the historic hospital property has been rezoned RMF-35 and was converted into the Meridian Condominiums, a five-story condominium building. Directly across the street to the east is the historical avenues block pattern, to our north is Northpoint, a 49-unit townhome community and finally to our west, Capitol Park Estates, a large lot home development.

In other words, there is no single land use in the surrounding neighborhood(s), so compatibility is a difficult metric for this property.

(Exhibit “B” surrounding development)

Inclusion of appropriate landscaping

Capitol Park Cottages will include full yard landscaping around each of the fourteen cottage lots that will be installed and maintained by an HOA. Lot landscaping will be varied and include water-wise techniques.

Our water-wise techniques were developed in partnership with the Jordan Valley Water Conservancy District’s “Localscape” program. The intent of Localscapes is to provide for efficient, functional, and beautiful landscape designs that recognize the unique climate of Utah. Our design will reserve irrigation-intensive sod for those areas that use it most and install water efficient landscape arrangements everywhere else.

Street trees will be planted along F Street, Capitol Park Avenue, and the private road in the interior of the project. The trees will provide an even canopy through and around the project.

A park will be dedicated to the HOA and built to provide recreation and community gathering opportunities for the residents.

Mobility

Five lots will front directly onto F Street for vehicular access. The remaining 14 Cottage lots will be accessed through a private road from Capitol Park Avenue (a private street).

With garages and driveways, no lot will include fewer than four off-street parking stalls. Homes on each lot will include three garage stalls for vehicular parking. A minimum of one off-street stall will be included in each lot on driveways.

On-street parking will be available on one side of the interior private road.

Park strip buffered sidewalks will be constructed along F Street and Capitol Park Avenue the interior private road will also include a sidewalk for pedestrian use.

Preservation of natural and built features that significantly contribute to the surrounding character

The property is vacant and includes no built features. The native vegetation includes several wild trees. Most trees will be removed as part of the construction of the development. All trees will be replaced on site or otherwise as permitted by the Salt Lake City Private Tree Ordinance.

No detrimental effect on city utilities

There will be no detrimental effect on the city utilities. Salt Lake Public Utilities has reviewed the conceptual plan and has determined that there is adequate sewer, storm drain, culinary water and transportation capacity in the system.

Road and sidewalk infrastructure have never been completed along F Street. The development of Capitol Park Cottages will complete this public infrastructure project.

Capitol Park Avenue is a private street, as will be the interior of Capitol Park Cottages. No additional street maintenance requirements will be necessary from Salt Lake City. When we purchased the land, we acquired an easement to connect utilities and have vehicular access “over and across” Capitol Park Avenue with a cost sharing agreement with the Meridien which meets all requirements of both the building and fire codes.

Planned Development Review (1/14/2022) Responses

Façade Engagement:

The Cottage Home plans have been designed with the main objective of incorporating ADUs in a thoughtful and innovative way. While all types of ADUs are critical tools in addressing the City’s housing shortage, our intent with Capitol Park Cottages is to demonstrate how integrating them in new-build housing offers an opportunity to mitigate some of their more common neighborhood criticisms. In particular, our home designs solve for critiques of ADUs such as visual inconsistency, setback intrusion, and lack of on-site covered parking.

By incorporating the ADUs internally in the primary home footprint the cottages include cohesive materials and designs, are not set on the extremities of the building-lot, and provide a dedicated garage parking stall for each ADU. Unlike basement ADUs, that are often inaccessible to the aging/disabled and offer less natural light and visual interest to any occupants, all our ADUs are designed at or above grade.

In solving for several critiques of ADUs the designs do come with a challenge: fitting 3 garage stalls on a cottage style home. To solve this issue, we have set back the garages in the rear of the home on the Cottage Duet plans and have angled the garages in a courtyard style for the Multi-Gen units. These design strategies reduce the visual impact of garage doors on the front facade.

Certain cottage homes in our plan will have increased public visibility in particular lots 6, 7, 8, and 19. On these homes we will employ “enhanced” design features such as material changes, wall breaks, and window additions.

Most of the cottage homes will be the Multi-Gen plan. This unit was designed expressly to accommodate multi-generational households. The ADU includes a double locking “hotel door” to the primary unit. This feature allows the primary dwelling owner to establish it as an independent apartment or a segment of the main household. Beyond income generation, this plan presents the opportunity to include an aging parent/grandparent or a disabled adult child within the household while still offering a level of independence. For this reason, the ADU unit is set at main level to minimize steps and maximize accessibility. The plan includes a single car garage that is dedicated to the ADU along with a double garage reserved for the primary residence. Because these garages are set at an angled courtyard the front porch is recessed. While the recessed porch decreases street engagement it does mitigate the garage door impact on the front façade. To balance the reduced porch engagement, additional windows and a Juliet balcony have been integrated to increase street engagement and pedestrian visibility.

Setbacks:

Several setback variances have been requested with the PD application to accommodate the unique housing product types, site configuration, and inclusion of open community areas. While the most intensive setback variances are unique to the internal community, certain perimeter variances are necessary for the project. In all cases where setback variances are employed the design has considered open space buffering and mitigation features where neighboring communities are present.

- **Internal Setback Reductions:** Setbacks have been reduced from the typical zoning regulations to provide building pads sufficient in size to fit the ADU/Home footprints internally and standard SR-1 setback lots along F Street. Additionally, reduction in setbacks provide for the homes to cluster in a way that allows more square footage to be incorporated in a common area open space. All together the reductions in internal setbacks provide for the community to concentrate building massing in the private community and along private roads while maintaining standard setbacks on the public right of way (F Street). We believe it is important to match the historical Avenues streetscape as we complete the F Street improvements and to limit variances where they are internal to the private neighborhood and streets.
- **North Setbacks:** The northern perimeter of the site is buffered by a private road in the Northpoint townhome community. The nearest residential structure exceeds 40’ from our northern boundary. Furthermore, our site includes the Northpoint community retaining wall and fence. As part of development the site will be excavated below Northpoint’s fence, extending the wall downwards and setting our homes well under Northpoint’s road. Building massing will be buffered and diminished by the grade change to an extent where setback reductions will have no detrimental effects on the northern border.
- **West Setbacks:** The west perimeter is the only border of the site that directly abuts other private residential properties. Two homes in Capitol Park Estates include back yards rearing the project site. We have mindfully designed the project to respect spacing and privacy considerations of the two neighboring lots. The homes we have selected to place along the western border are the “Multi-Gen”. The Multi-Gen has a second story that

starts nine feet away from the rear of the home footprint. By selecting this plan, we are able to keep the tallest part of our home further setback from the neighboring lots. The Multi-Gen does include a ground level portion of the home (the ADU) at its rear. If we were building a detached ADU, we would be able to place it within 10' of the neighboring home (in this case right along the fence). However, because our ADU is attached to the primary home, it is necessary for us to include a modest rear yard setback variance (21' from 25'). The resulting rear spacing between structures would be 56' (65' from second level). Even with a 50'+ distance from the neighboring homes we are implementing other mitigation features. The western border includes a transparent wrought iron fence. To mitigate any privacy concerns with the western border we will erect a new privacy Trex fence and plant trees and hedges along the length of the western perimeter.

Tree Preservation:

At this time, it is expected that most existing trees will be removed from the site. We will work with the Urban Forester to determine if any trees will be preserved. All trees will be replaced on site or otherwise as permitted by the Salt Lake City Private Tree Ordinance.

Natural Features Standard:

Like the remainder of the Avenues, the project site is located on the sloping hills below the Bonneville Shoreline. To make development of roads and structures plausible, the Avenues have utilized grade modifications and retaining walls throughout. These built features have created the unique character of “stepped ascension” as one moves north up the Avenue streets. In few places is this characteristic more pronounced than in the neighborhoods directly abutting the project site. The four lots across F-Street use varying retaining walls along their property lines creating the illusion of a tiered “wedding cake”. Capitol Park Estates uses grade retention all over and as Capitol Park Avenue winds (about 348 E Redbrick Court) a towering wall sets homes well above their adjacent neighbors. In fact, retaining walls exist on our project site currently as its only built feature. The length of the border between our project site and the Northpoint townhome community is run by a flat concrete retaining wall (in some places as high as 5').

- **Grade Changes:** We have further clarified the development grade changes on our Grading & Drainage Plan update. A color-coded elevation table is provided showing the levels of cut and fill needed to make our new road slope and building pads functional. There is no more than 0'-5' of elevation changes along F-Street to match the existing public road infrastructure. In fact, the vast majority of the site will see 0'- 5' elevation change. The exceptional grade changes are present where they will be least visible from outside of the project. Namely, the center of the site will see upwards of 15' of fill whereas areas of the northern border will see upwards of 13' of cut. The resulting balance will leave the development site with a similar slope angle as is present along F-Street.

- **Retaining Walls:** Like the surrounding neighborhoods, the project will employ several retaining walls, of varying heights, to make the park, road, and houses buildable. The wall heights are called out accordingly in our submitted site plan. While most walls will be less than 5' there will be sections of new wall that will be as high as 13'. The tallest walls are created through the downward extension of the existing northern border wall. As elevation is cut from the north boundary the walls are set to catch the grade between our north border. The result is that there will be no higher wall elevation than what is currently present on site. A detailed cross section (Section A) is available on our Site Plan to visually clarify how the tallest wall is established. We understand that there are grade change stepping requirements to limit large retaining walls as visual nuisances. As part of the PD and to preserve our setbacks and open space we will require a variance to this provision. We are comfortable that within our project our most intense walls are highly screened from pedestrian view. To visually clarify how walls will be screened we have provided a cross section (Section A-A) on our Grading & Drainage Plan. The cross-section shows how our tallest wall, along with other walls, are screened by building massing. The only wall flats that will be unscreened to the public are along our private park boundary. These walls will be able to meet the standard stepping requirements and will be further screened by trees, shrubs, and other landscape features.

Pedestrian Circulation:

The Planned Development comments suggested a connection/steps linking the upper driveway to the park. We will implement this connection and believe that this is an excellent method to encourage accessibility, use, and increased pedestrian circulation.

1978 Future Land-Use Map

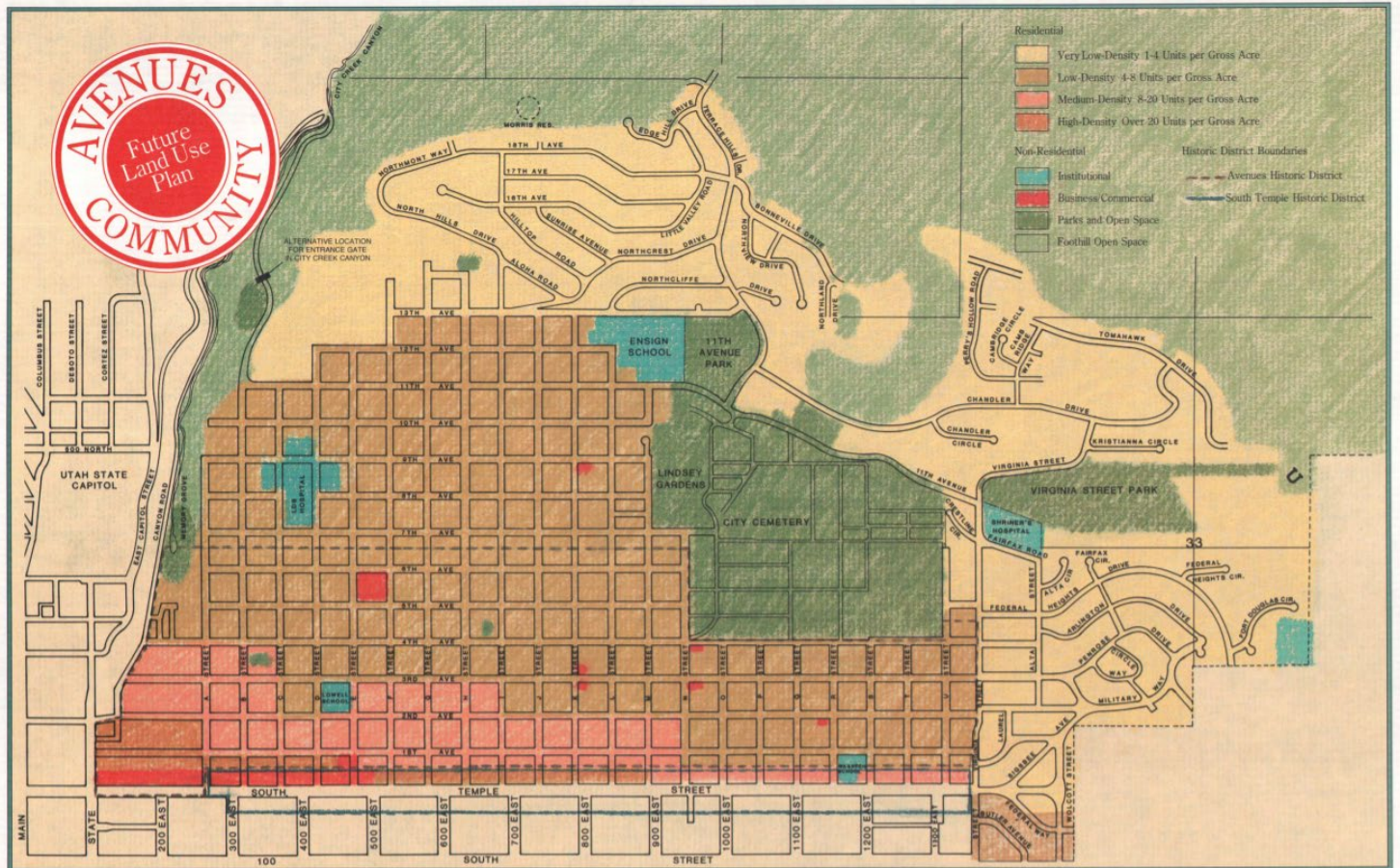
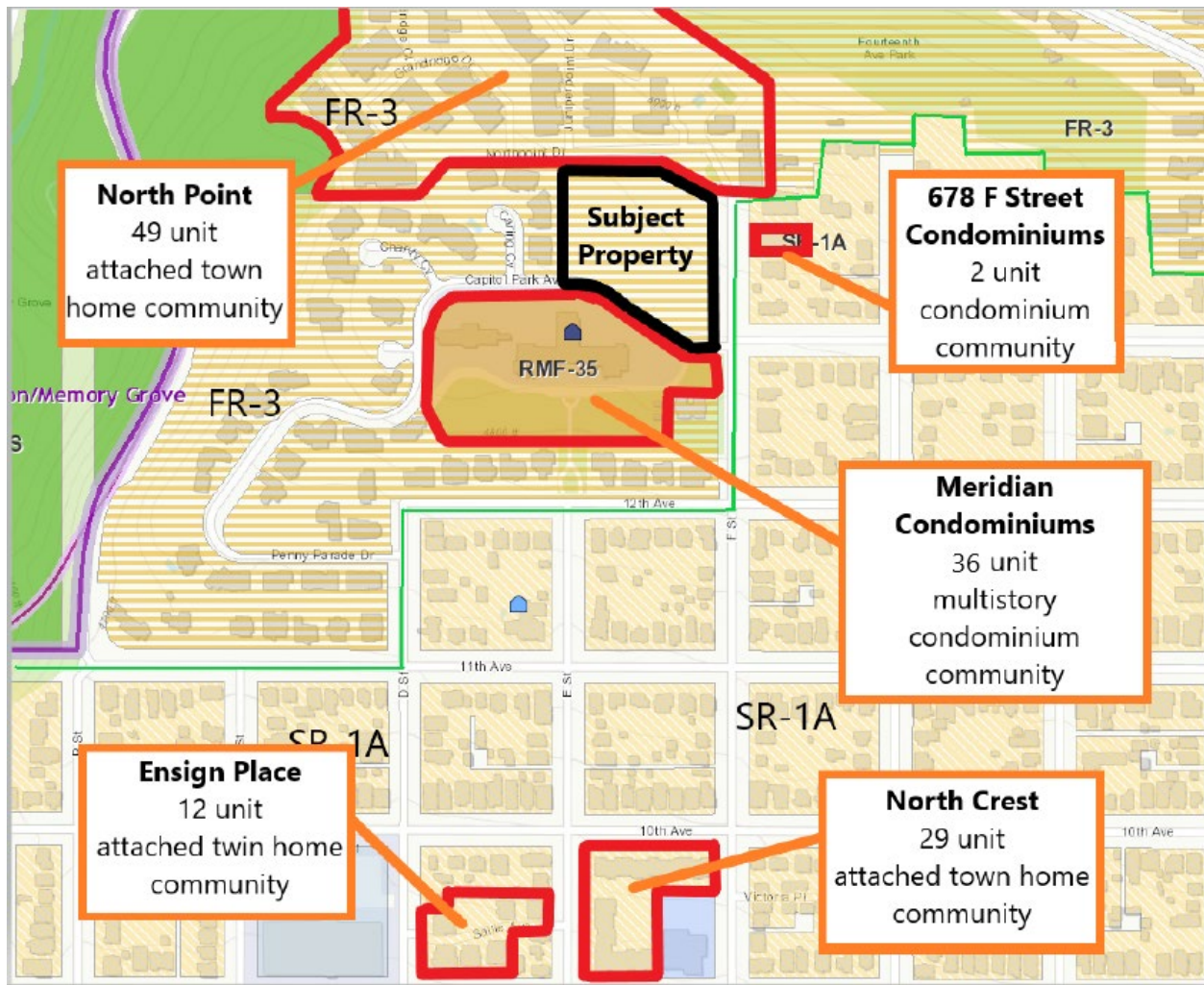
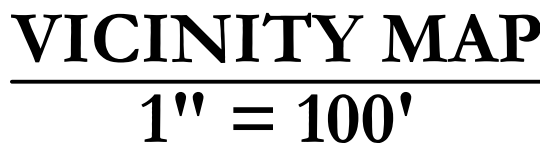


Exhibit "B"

Surrounding Development





SALT LAKE CITY, UTAH

PRELIMINARY PLANS

A SITE SPECIFIC GEOTECHNICAL STUDY HAS BEEN PREPARED FOR THIS PROJECT BY IGES. THE REPORT IS DATED MARCH 3, 2020, AND WAS PREPARED BY JUSTIN WHITMER, PE. IT IS IDENTIFIED BY IGES PROJECT NUMBER 02058-118. THE REQUIREMENTS OUTLINED IN THIS STUDY SHALL BE FOLLOWED ON THIS PROJECT.

BENCHMARK

THE PROJECT BENCHMARK IS A BRASS CAP STREET MONUMENT IN A WELL AT THE INTERSECTION OF "F" STREET AND 13TH AVENUE. THE ELEVATION OF THE BRASS CAP IS 4840.88'.



OWNER:

Ivory Development
978 East Woodoak Lane
Salt Lake City, UT 84117
801-747-7000



NOTES:

1. All sanitary sewer improvements shall conform with the standards and specifications of Salt Lake City Public Utilities.
2. All culinary water improvements shall conform with the standards and specifications of Salt Lake City Public Utilities.
3. All improvements in the public right of way shall conform with the standards and specifications of Salt Lake City and APWA.
4. All private improvements shall conform to APWA standards and specifications.
5. Contractor to field locate and verify the horizontal and vertical location of all utilities prior to beginning work.



Title Sheet

PROJECT:	
DRAWN BY:	KMV
REVIEWED BY:	NMN
REVISIONS:	
No. DATE	REMARK

DATE: April 27, 2022

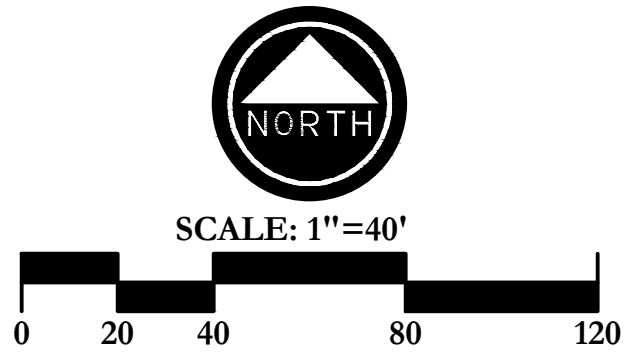
SHEET NUMBER:

O-1

CAPITOL PARK SUBDIVISION

PARCEL NUMBER 109-30-455-021

LYING WITHIN THE SOUTHEAST QUARTER (SE 1/4) OF
SECTION 30, TOWNSHIP 1 NORTH, RANGE 1 EAST, SALT LAKE BASE AND
MERIDIAN, SALT LAKE CITY, SALT LAKE COUNTY, UTAH



LEGEND	
	BOUNDARY LINE
	LOT LINE
	SECTION LINE
	CENTERLINE / MONUMENT LINE
	ADJACENT PROPERTY LINE
	SURVEY TIE LINE
	RIGHT OF WAY LINE
	EASEMENT LINE
	SECTION CORNER (FOUND)
	CALCULATED STREET MONUMENT (NOT FOUND)
	ROAD MONUMENT MONUMENT TO BE SET BY PERMIT FROM THE S.L. COUNTY SURVEYOR
	FOUND PROPERTY CORNER (DESCRIPTION NOTED WHERE APPLICABLE)

CURVE TABLE					
CURVE	LENGTH	RADIUS	DELTA	CH DIRECTION	CH LENGTH
C1	62.31	102.00	34°59'56"	N72°30'02"W	61.34
C2	160.04	262.00	34°59'58"	N72°29'59"W	157.57
C3	56.58	102.00	31°47'05"	N74°06'27"W	55.86
C4	5.72	102.00	3°12'55"	N56°36'28"W	5.72
C5	41.20	262.00	9°00'39"	N59°30'19"W	41.16
C6	20.71	66.00	17°58'47"	S14°09'19"W	20.63
C7	5.96	66.00	5°10'20"	N2°34'46"E	5.96
C8	40.84	26.00	90°00'00"	N44°59'36"E	36.77
C9	9.19	33.00	15°57'48"	N82°01'30"W	9.16
C10	16.44	59.00	15°57'48"	N82°01'30"W	16.38
C11	40.84	26.00	90°00'00"	S45°00'24"E	36.77
C12	16.16	40.00	23°09'06"	S11°34'09"W	16.05
C13	92.83	262.00	20°18'02"	N79°50'57"W	92.34
C14	21.42	53.00	23°09'06"	N11°34'09"E	21.27
C15	12.82	46.00	15°57'48"	N82°01'30"W	12.77
C16	12.82	46.00	15°57'48"	N82°01'30"W	12.77
C17	13.01	262.00	2°50'39"	N65°25'58"W	13.00
C18	13.01	262.00	2°50'39"	N68°16'37"W	13.00

LINE TABLE		
LINE	LENGTH	BEARING
L1	10.86	N23°08'42"E
L2	10.86	N00°00'24"W
L3	6.45	N89°59'36"E
L4	6.45	N74°02'36"W
L5	6.45	S74°02'36"E
L6	6.45	N89°59'36"E



NARRATIVE:

THIS SUBDIVISION PLAT WAS PREPARED AT THE REQUEST OF IVORY DEVELOPMENT FOR THE PURPOSE OF SUBDIVIDING THE PARCELS OF LAND KNOWN BY THE SALT LAKE COUNTY ASSESSOR AS PARCEL NUMBER 09-30-455-021 INTO LOTS AND STREETS AS SHOWN HEREON. EXISTING MONUMENTS SHOWN ON THIS PLAT WERE OBSERVED IN THEIR RECORD LOCATIONS.

BASIS OF BEARING:

NORTH 45°19'57" EAST, BEING THE BEARING BETWEEN TWO FOUND CENTER OF STREET MONUMENTS AT 12TH AVENUE/F STREET AND 13TH AVENUE/G STREET.

ACCURACY STATEMENT:

FIELD MEASUREMENTS ON THE GROUND SHALL CLOSE WITHIN A TOLERANCE OF ONE FOOT (1') TO FIFTEEN THOUSAND FEET (15,000') OF PERIMETER PER SLC ORDINANCE 20.20.30.C.

NOTES:

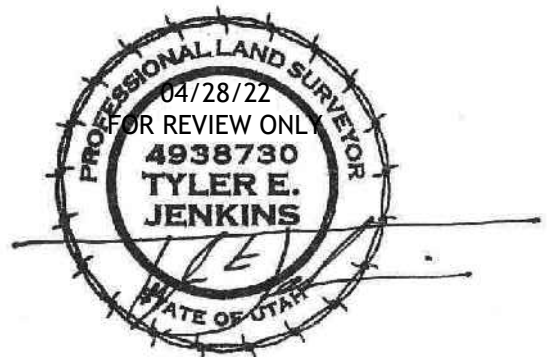
- A 5/8" REBAR WITH PLASTIC CAP MARKED EDM WILL BE SET AT ALL REAR CORNERS AND ALONG BOUNDARY EXCEPT, FRONT LOT LINES WILL BE MARKED WITH A RIVET IN THE CURB AT THE LOT LINE EXTENDED
- STREET ADDRESSES FOR EACH HOME AND ADU SHALL EITHER HAVE THE SUFFIX "UNIT A" OR "UNIT B". MAIN RESIDENCES SHALL ADDRESS AS "UNIT A" WHILE THE ADU'S ADDRESSED AS "UNIT B".
- ALL PRIVATE ROADS WITHIN THE SUBDIVISION ARE A PUBLIC UTILITY EASEMENT.

SURVEYOR'S CERTIFICATE

I, TYLER E. JENKINS, DO HEREBY CERTIFY THAT I AM A LICENSED PROFESSIONAL LAND SURVEYOR IN THE STATE OF UTAH AND THAT I HOLD LICENSE NO.4938730 IN ACCORDANCE WITH TITLE 58, CHAPTER 22, OF THE PROFESSIONAL ENGINEERS AND LAND SURVEYORS ACT; I FURTHER CERTIFY THAT BY AUTHORITY OF THE OWNERS I HAVE COMPLETED A SURVEY OF THE PROPERTY DESCRIBED ON THIS SUBDIVISION PLAT IN ACCORDANCE WITH SECTION 17-23-17 OF UTAH STATE CODE AND HAVE VERIFIED ALL MEASUREMENTS; THAT THE REFERENCE MONUMENTS SHOWN ON THIS PLAT ARE LOCATED AS INDICATED AND ARE SUFFICIENT TO RETRACE OR REESTABLISH THIS PLAT; AND THAT THE INFORMATION SHOWN HEREIN IS SUFFICIENT TO ACCURATELY ESTABLISH THE LATERAL BOUNDARIES OF THE HEREIN DESCRIBED TRACT OF REAL PROPERTY; AND HAVE SUBDIVIDED SAID TRACT OF LAND INTO LOTS AND STREETS, HEREAFTER TO BE KNOWN AS:

CAPITOL PARK SUBDIVISION

AND THAT THE SAME HAS BEEN CORRECTLY SURVEYED AND STAKED ON THE GROUND.



BOUNDARY DESCRIPTION

BEGINNING AT THE SOUTHEAST CORNER OF LOT 1 CAPITOL PARK AVENUE EXTENSION SUBDIVISION, RECORDED AS ENTRY #8923328, IN BOOK 2003P, ON PAGE 391 AT THE SALT LAKE COUNTY RECORDER'S OFFICE, SAID POINT ALSO BEING ON THE NORTHERLY RIGHT-OF-WAY OF CAPITOL PARK AVENUE; SAID POINT OF BEGINNING ALSO BEING N89°51'13"W 416.49 FEET, N00°00'24"W 3.89 FEET AND N90°00'00"W 41.69 FEET FROM A FOUND STREET MONUMENT AT THE INTERSECTION OF "G" STREET AND 13TH AVENUE; AND RUNNING THENCE ALONG SAID SOUTHERLY RIGHT-OF-WAY THE FOLLOWING 4 CALLS: 1). N90°00'00"W 34.78 FEET; 2). THENCE ALONG A NON-TANGENT CURVE TO THE RIGHT, HAVING A RADIUS OF 102.00 FEET, A DISTANCE OF 62.31 FEET, A CHORD DIRECTION OF N72°30'02"W AND A CHORD DISTANCE OF 61.34 FEET; 3). THENCE N55°00'00"W 180.63 FEET; 4). THENCE ALONG A NON-TANGENT CURVE TO THE LEFT, HAVING A RADIUS OF 262.00 FEET, A DISTANCE OF 160.04 FEET, A CHORD DIRECTION OF N72°29'59"W AND A CHORD DISTANCE OF 157.57 FEET TO A POINT ON THE NORTHERLY RIGHT-OF-WAY OF CAPITOL PARK AVENUE, SAID POINT ALSO BEING THE EASTERLY BOUNDARY OF CAPITOL PARK PLANNED DEVELOPMENT PHASE 4 AS RECORDED IN BOOK 1996P, ON PAGE 273 AT THE SALT LAKE COUNTY RECORDER'S OFFICE; THENCE N00°00'24"W 296.86 FEET ALONG SAID EAST BOUNDARY, SAID POINT ALSO BEING THE SOUTHERLY RIGHT-OF-WAY OF NORTH POINT DRIVE; THENCE S89°51'43"E 217.58 FEET ALONG SAID SOUTHERLY RIGHT-OF-WAY; S60°00'00"E 200.84 FEET TO THE WESTERLY RIGHT-OF-WAY OF "F" STREET; THENCE S00°00'24"E 365.35 FEET ALONG THE WESTERLY OF "F" STREET TO THE POINT OF BEGINNING.

CONTAINING 3.21 ACRES IN AREA, 19 LOTS AND 1 PARCEL
SALT LAKE COUNTY TAX ID. NO. 09-30-455-0210

OWNER'S DEDICATION

I/WE, THE UNDERSIGNED OWNER(S) OF THE HEREIN DESCRIBED TRACT OF LAND, DO HEREBY SET APART AND SUBDIVIDE THE SAME INTO LOTS, STREETS AND COMMON AREAS AS SHOWN HEREON TO BE HEREAFTER KNOWN AS:

CAPITOL PARK SUBDIVISION

AND DO HEREBY DEDICATE FOR PERPETUAL USE AND DO HEREBY GRANT UNTO EACH PRIVATE UTILITY COMPANY AND PUBLIC UTILITY AGENCY PROVIDING UTILITY SERVICES TO THIS PROJECT, A PERPETUAL NON-EXCLUSIVE EASEMENT IN ALL AREAS SHOWN HEREON INCLUDING THE PRIVATE ROADWAY, COMMON AREAS, AND PRIVATE ROAD TO INSTALL, USE, KEEP, MAINTAIN, REPAIR AND REPLACE AS REQUIRED, UNDERGROUND UTILITY LINES, PIPES AND CONDUITS OF ALL TYPES AND APPURTENANCES THERETO SERVING THIS PROJECT.

NAME: CHRISTOPHER P. GAMVROULAS
TITLE: PRESIDENT OF IVORY DEVELOPMENT, LLC

ACKNOWLEDGEMENT

ON THE _____ DAY OF _____, A.D., 20____, CHRISTOPHER P. GAMVROULAS PERSONALLY APPEARED BEFORE ME, THE UNDERSIGNED NOTARY PUBLIC, IN AND FOR SAID COUNTY OF SALT LAKE IN THE STATE OF UTAH, WHO AFTER BEING DULY SWORN, ACKNOWLEDGED TO ME THAT HE IS THE PRESIDENT OF IVORY DEVELOPMENT LLC AND THAT HE SIGNED THE OWNER'S DEDICATION FREELY AND VOLUNTARILY FOR AND IN BEHALF OF SAID LIMITED LIABILITY COMPANY FOR THE PURPOSES THEREIN MENTIONED.

NOTARY PUBLIC _____ COMMISSION NUMBER _____ SIGNATURE _____

A NOTARY PUBLIC COMMISSIONED IN THE STATE OF UTAH. COMMISSION EXPIRES _____

CAPITOL PARK SUBDIVISION

PARCEL NUMBER 109-30-455-021

LYING WITHIN THE SOUTHEAST QUARTER (SE 1/4) OF
SECTION 30, TOWNSHIP 1 NORTH, RANGE 1 EAST,
SALT LAKE BASE AND MERIDIAN, SALT LAKE CITY,
SALT LAKE COUNTY, UTAH

SHEET 1 OF 1

SALT LAKE COUNTY RECORDER

STATE OF UTAH, COUNTY OF SALT LAKE, RECORDED AND FILED AT THE REQUEST OF:
DATE: _____ TIME: _____ BOOK: _____ PAGE: _____

FEE _____ SALT LAKE COUNTY DEPUTY RECORDER _____

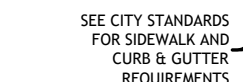


2815 East 3300 South, Salt Lake City, UT 84109
(801) 305-4670 www.edmpartners.com



NOTES:

1. EACH LOT CONTAINS ONE PRIMARY UNIT AND ONE ADU
2. PRIVATE PARKING NOT IN DRIVEWAY.

* ZONING REQUIREMENTS TO BE MODIFIED

CAPITOL PARK AVENUE SECTION
NOT TO SCALE





SCALE: 1" = 30'



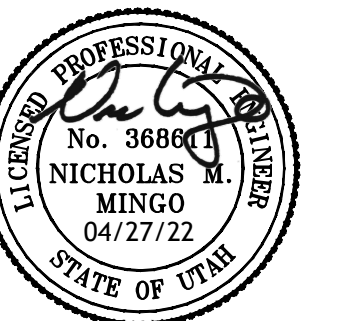
OWNER:

Ivory Development
978 East Woodoak Lane
Salt Lake City, UT 84117
801-747-7000



NOTES:

1. All sanitary sewer improvements shall conform with the standards and specifications of Salt Lake City Public Utilities.
2. All culinary water improvements shall conform with the standards and specifications of Salt Lake City Public Utilities.
3. All improvements in the public right of way shall conform with the standards and specifications of Salt Lake City and APWA.
4. All private improvements shall conform to APWA standards and specifications.
5. Contractor to field locate and verify the horizontal and vertical location of all utilities prior to beginning work.
6. No new above-ground electrical equipment in public ROW.
7. Water system is private and will be maintained by HOA.
8. All utilities must meet separation requirements, including laterals.



Capitol Park

Utility Plan

PROJECT:	
DRAWN BY:	KMW
REVIEWED BY:	NMM
REVISIONS:	
No. DATE	REMARKS

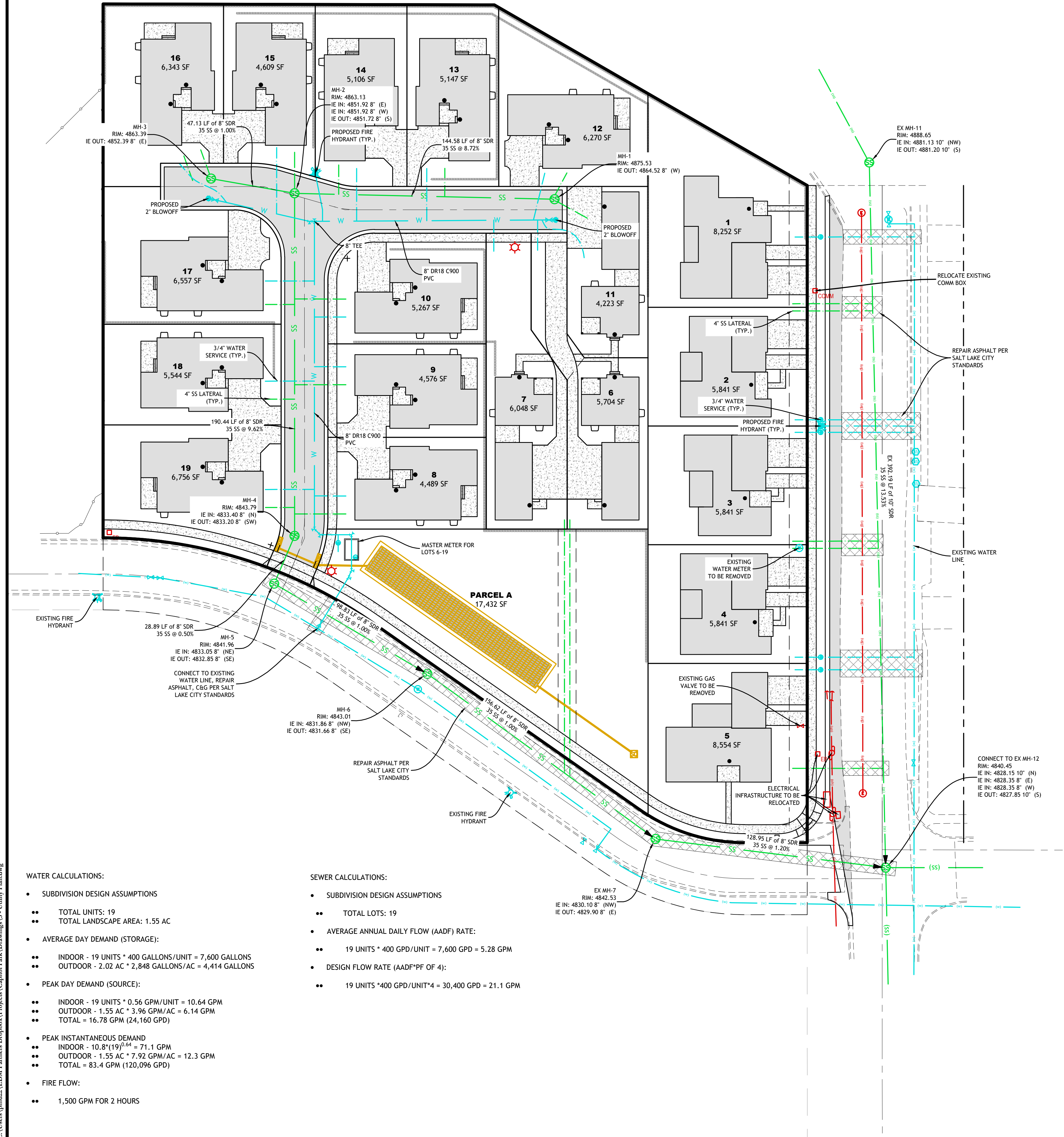
DATE: April 27, 2022

SHEET NUMBER:

O-3

NOTE:

UNITS 6 & 7 REQUIRE FIRE SPRINKLERS TO MEET SPECIAL EXCEPTION REQUIREMENTS FOR ACCESS DISTANCE



C:\Users\pmd22\EDM Partners Dropbox\Projects\Capitol Park\Drawings\3 - Utility Plan.dwg

C:\Users\jmd23\EDM Partners\Dropbox\Projects\Capitol Park\Drawings\4- Grading and Drainage\Plan.dwg



2815 East 3300 South, Salt Lake City, UT 84109
(801) 305-4670 www.edmpartners.com



SCALE: 1" = 30'
0 15 30 60 90

OWNER:

Ivory Development
978 East Woodoak Lane
Salt Lake City, UT 84117
801-747-7000



NOTES:

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- All culinary water improvements shall conform with the standards and specifications of Salt Lake City Public Utilities.
- All improvements in the public right of way shall conform with the standards and specifications of Salt Lake City and APWA.
- All private improvements shall conform to APWA standards and specifications.
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Capitol Park

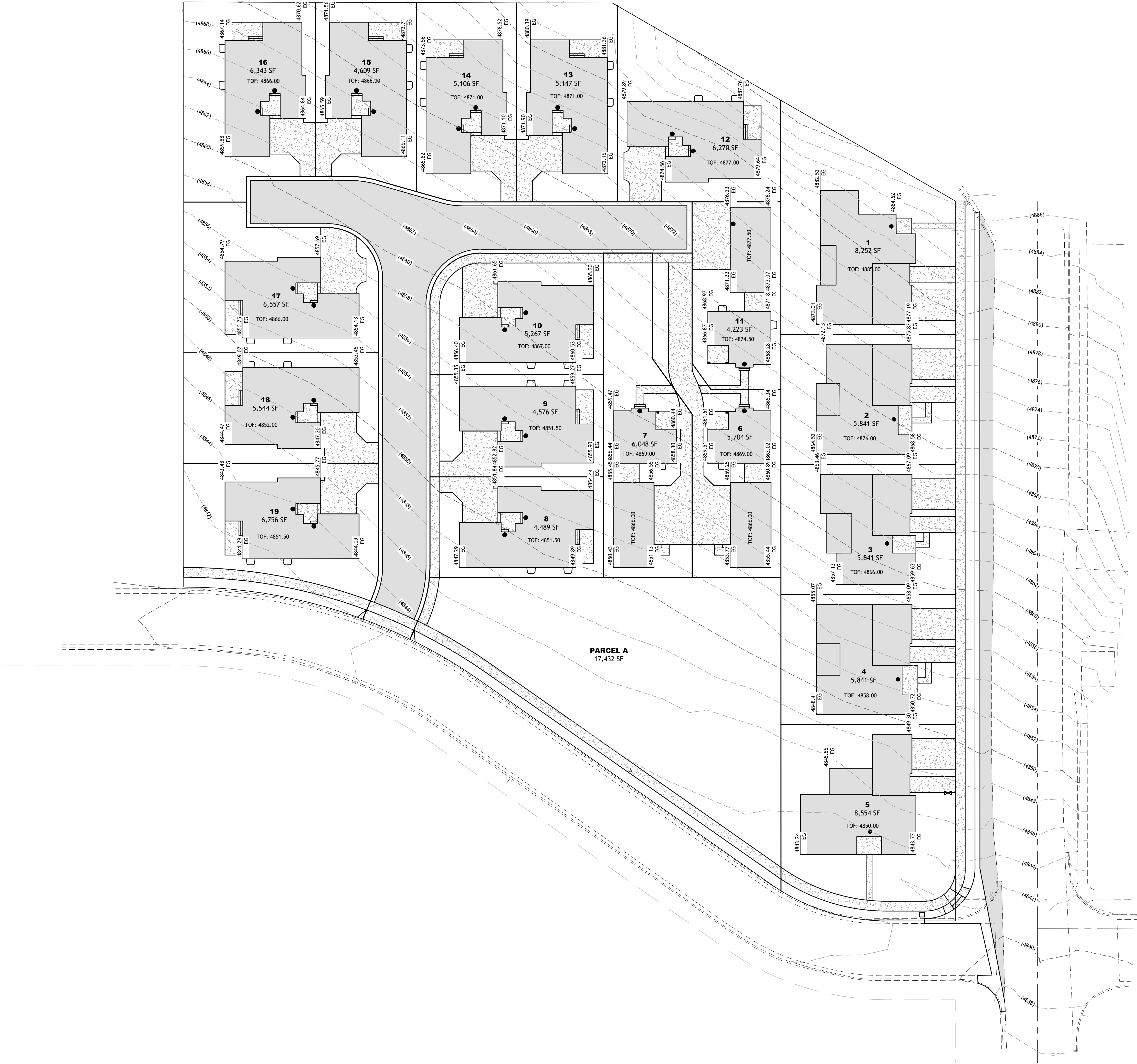
Grading & Drainage Plan

PROJECT: _____
DRAWN BY: KMW
REVIEWED BY: NMM
REVISIONS: _____
No. DATE REMARKS

DATE: April 27, 2022

SHEET NUMBER:

O-4



2815 East 3300 South, Salt Lake City, UT 84109
(801) 305-4670 www.edmpartners.com



SCALE: 1" = 25'



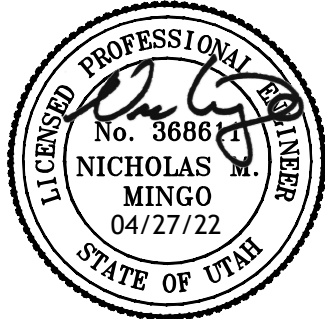
OWNER:

Ivory Development
978 East Woodoak Lane
Salt Lake City, UT 84117
801-747-7000



NOTES:

1. All sanitary sewer improvements shall conform with the standards and specifications of Salt Lake City Public Utilities.
2. All culinary water improvements shall conform with the standards and specifications of Salt Lake City Public Utilities.
3. All improvements in the public right of way shall conform with the standards and specifications of Salt Lake City and APWA.
4. All private improvements shall conform to APWA standards and specifications.
5. Contractor to field locate and verify the horizontal and vertical location of all utilities prior to beginning work.



Capitol Park

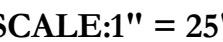
Existing Ground Grading Plan

PROJECT: _____
DRAWN BY: KMW
REVIEWED BY: NMM
REVISIONS: _____
No. DATE REMARKS

DATE: April 27, 2022

SHEET NUMBER:

O-5



Ivory Development
978 East Woodoak Lane
Salt Lake City, UT 84117
801-747-7000



NOTES:

1. All sanitary sewer improvements shall conform with the standards and specifications of Salt Lake City Public Utilities.
2. All culinary water improvements shall conform with the standards and specifications of Salt Lake City Public Utilities.
3. All improvements in the public right of way shall conform with the standards and specifications of Salt Lake City and APWA.
4. All private improvements shall conform to APWA standards and specifications.
5. Contractor to field locate and verify the horizontal and vertical location of all utilities prior to beginning work.



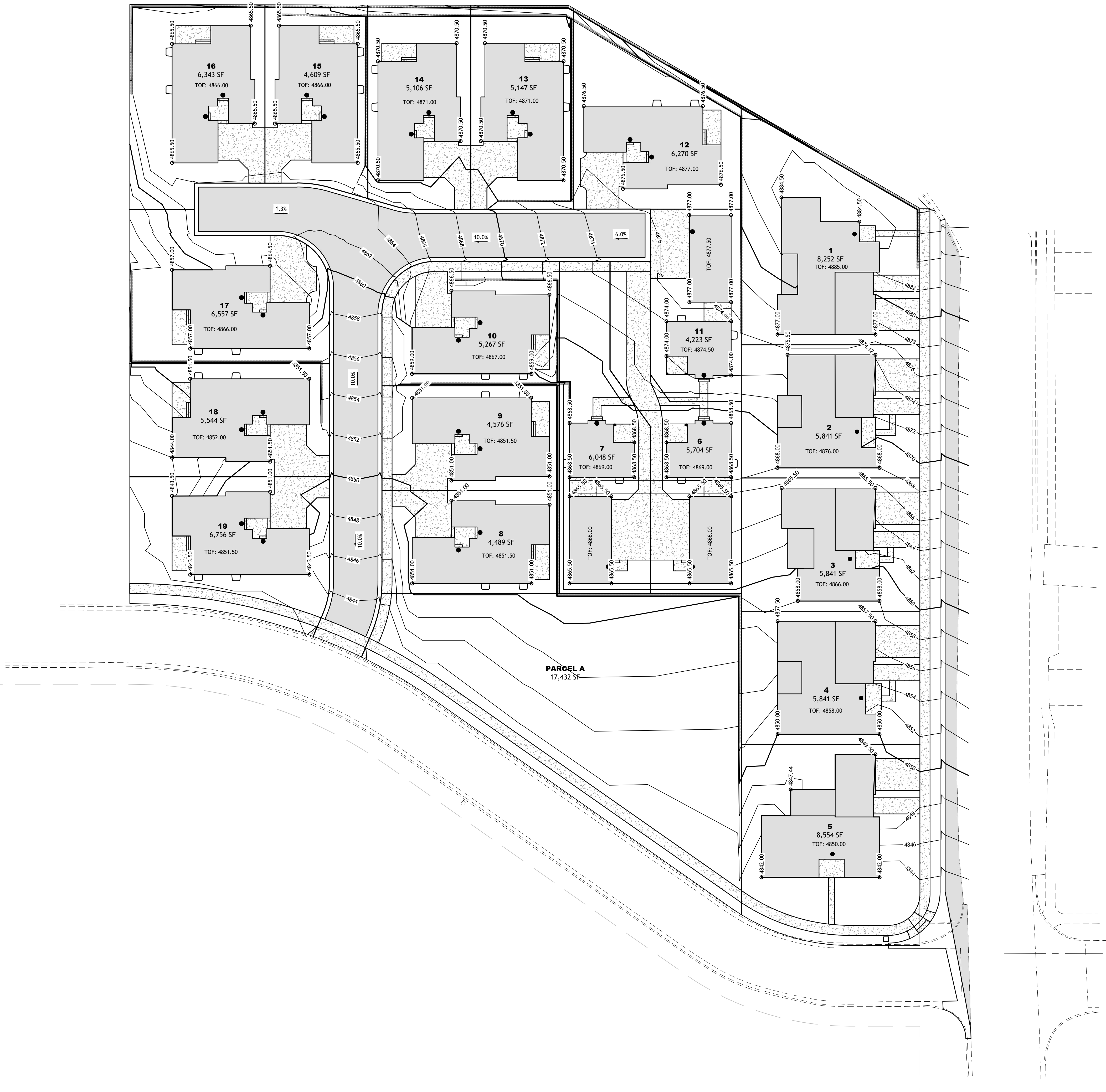
Established Grade Grading Plan

PROJECT:	
DRAWN BY:	KMW
REVIEWED BY:	NMM
REVISIONS:	
No. DATE	REMARKS

DATE: April 27, 2022

SHEET NUMBER:

0-6



2815 East 3300 South, Salt Lake City, UT 84109
(801) 305-4670 www.edmpartners.com



SCALE: 1" = 25'



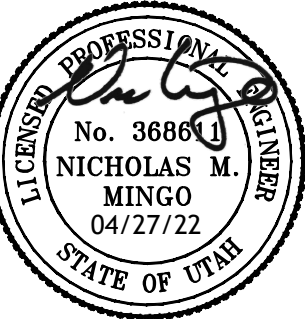
OWNER:

Ivory Development
978 East Woodoak Lane
Salt Lake City, UT 84117
801-747-7000



NOTES:

- All sanitary sewer improvements shall conform with the standards and specifications of Salt Lake City Public Utilities.
- All culinary water improvements shall conform with the standards and specifications of Salt Lake City Public Utilities.
- All improvements in the public right of way shall conform with the standards and specifications of Salt Lake City and APWA.
- All private improvements shall conform to APWA standards and specifications.
- Contractor to field locate and verify the horizontal and vertical location of all utilities prior to beginning work.



Capitol Park

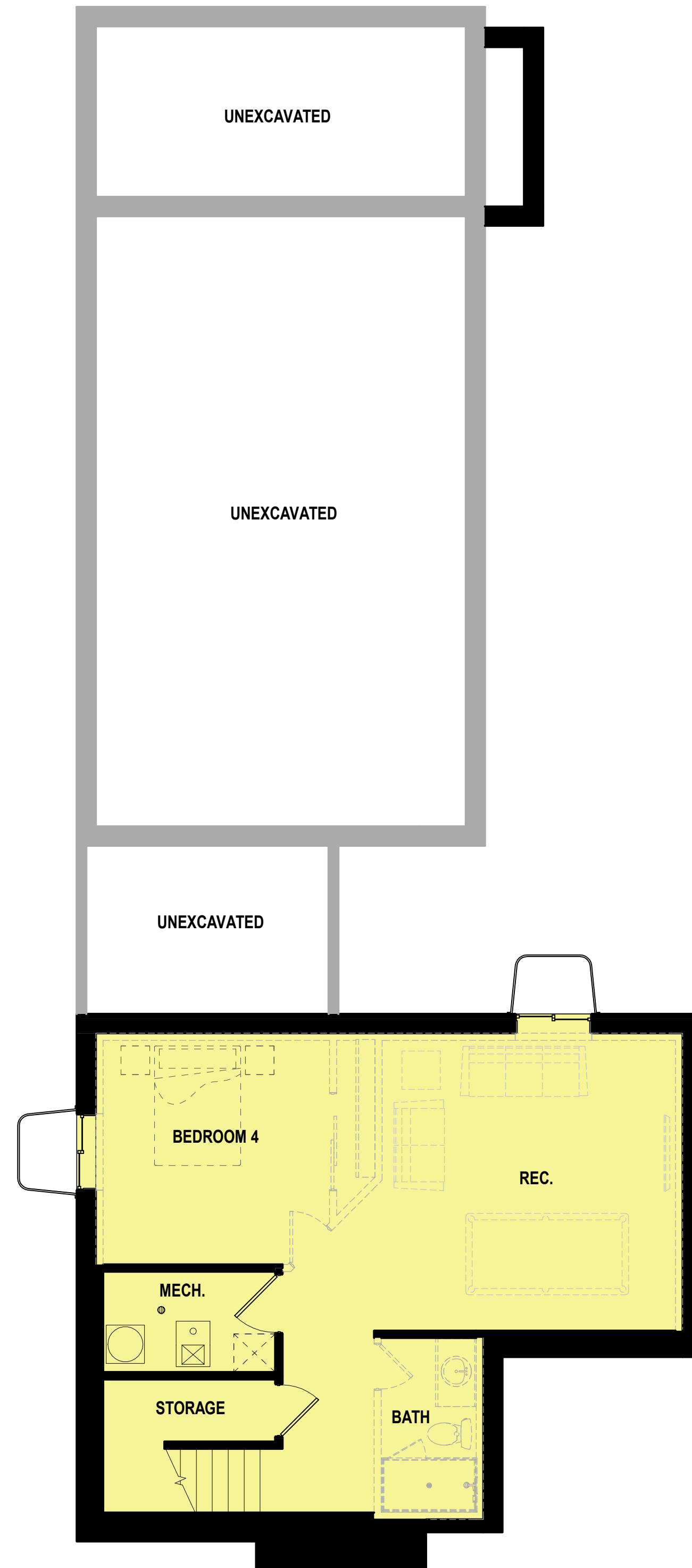
Finish Grade Grading Plan

PROJECT: _____
DRAWN BY: _____ KMW
REVIEWED BY: _____ NMM
REVISIONS: _____
No. DATE _____ REMARKS _____

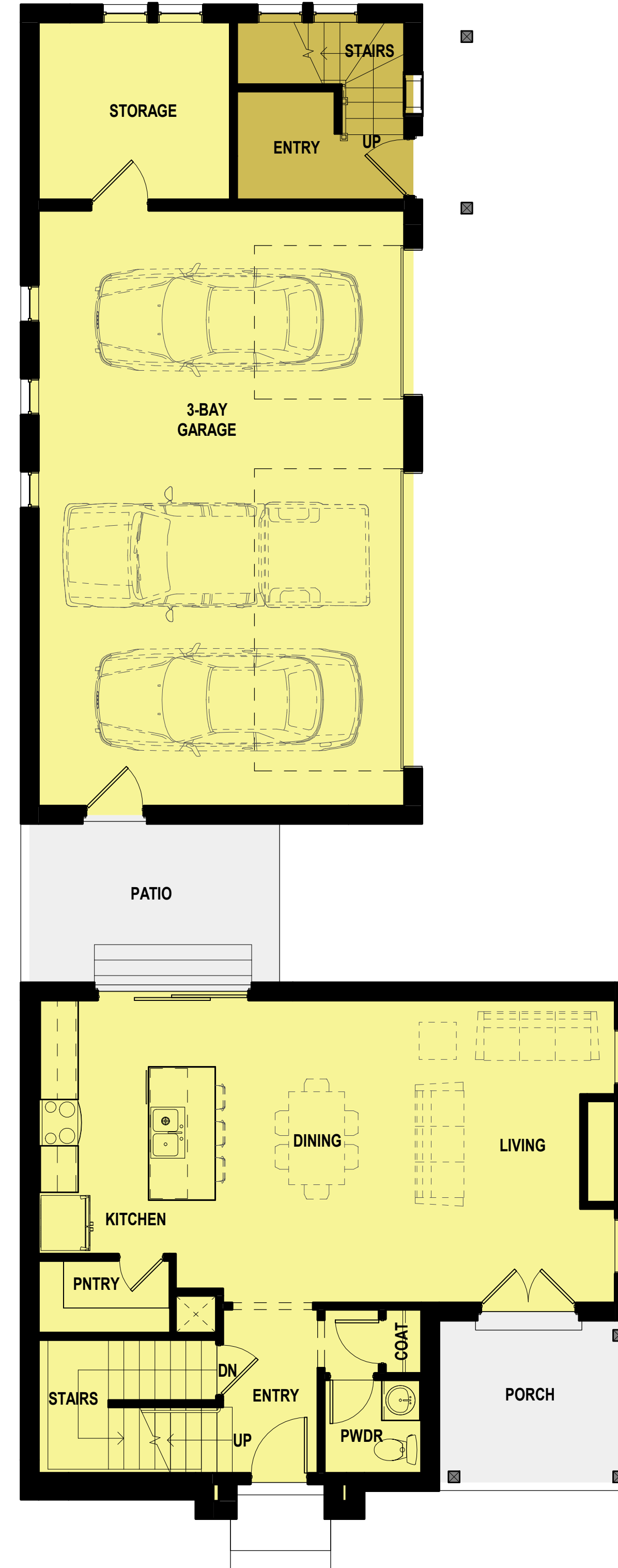
DATE: April 27, 2022

SHEET NUMBER:

O-7



BASEMENT



FIRST FLOOR



SECOND FLOOR

BASEMENT	810 SF
FIRST FLOOR	758 SF
GARAGE + STORAGE	787 SF
SECOND FLOOR	1095 SF
MAIN LIVING	3450 SF

ADU FIRST FLOOR	104 SF
ADU SECOND FLOOR	601 SF
ADU TOTAL	705 SF
COMBINED TOTAL	4156 SF



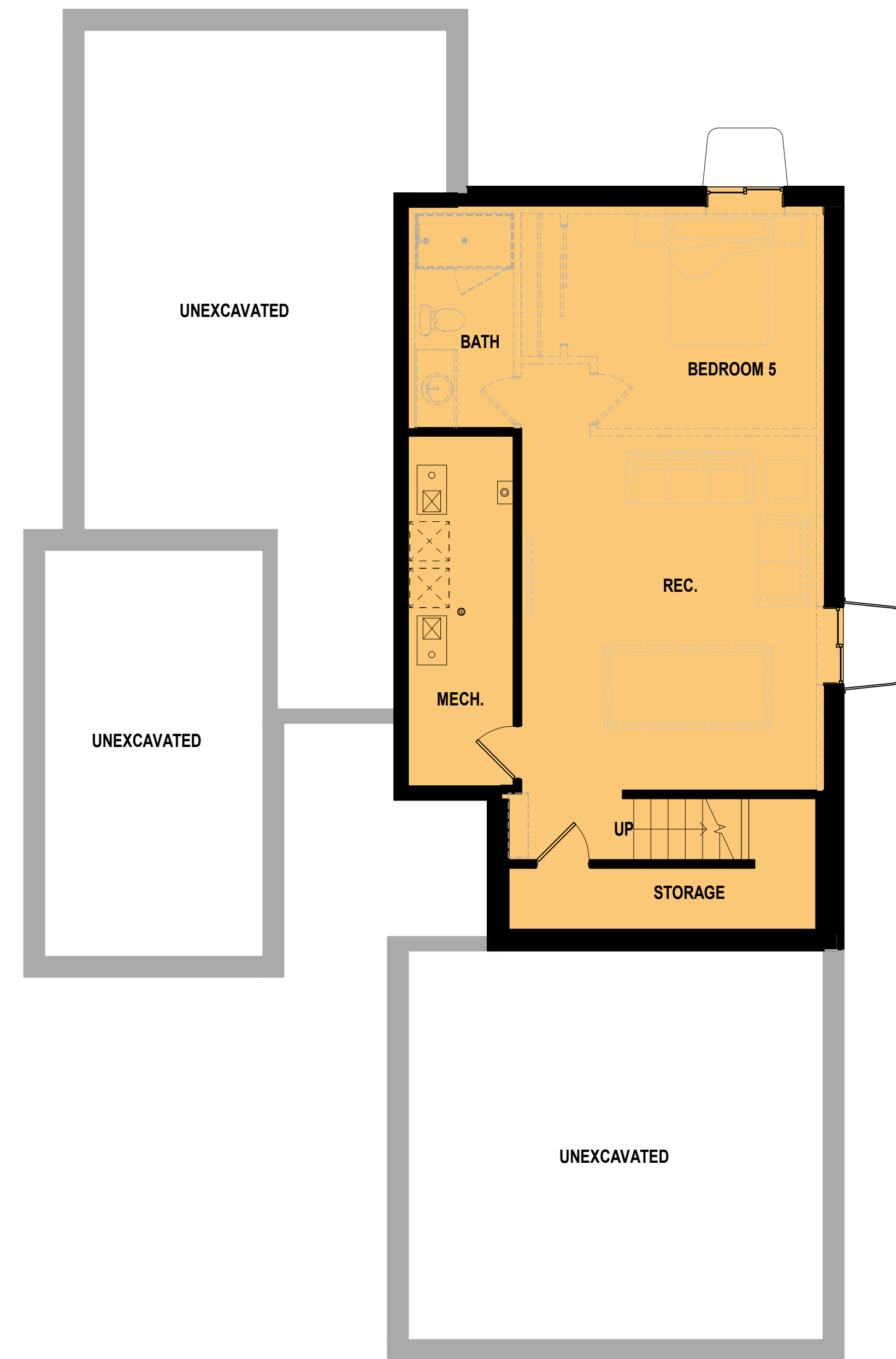
*Enhanced Side Elevation Particular to Lot 11



*Enhanced Rear Elevation Particular to Lots 6 & 7



Elevations are conceptual and subject to change. Certain architectural components (bump outs, material mixes, window placements, color changes, roof lines, etc.) may be modified to promote visual diversity among units. Home elevation sides that have restricted public visibility will employ "reduced-brick" options and include stucco, hardboard or other exterior materials.



BASEMENT



FIRST FLOOR



SECOND FLOOR

BASEMENT	849 SF
FIRST FLOOR	819 SF
GARAGE	463 SF
SECOND FLOOR	1685 SF
MAIN LIVING	3817 SF

ADU FIRST FLOOR	540 SF
ADU GARAGE	269 SF
ADU TOTAL	810 SF
COMBINED TOTAL	4626 SF



FRONT

*Enhanced Front Facade for all Multi-Gen Lots



RIGHT

*Enhanced Side Elevation Particular to Lots 8 and 19



REAR



LEFT

Elevations are conceptual and subject to change. Certain architectural components (bump outs, material mixes, window placements, color changes, roof lines, etc.) may be modified to promote visual diversity among units. Home elevation sides that have restricted public visibility will employ "reduced-brick" options and include stucco, hardiboard or other exterior materials.

ATTACHMENT D: **FR-3 and SR-1 Zoning Summaries**

The attached documents are a visual summary of the FR-3 and SR-1 zoning regulations.

FR-3 /12,000

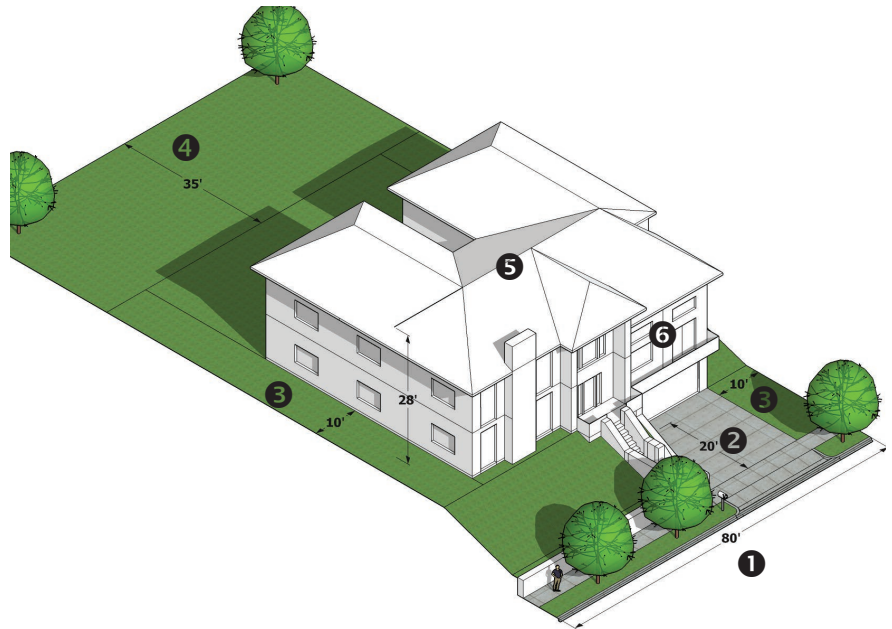
FOOTHILLS RESIDENTIAL DISTRICT

MINIMUM LOT SIZE: 12,000 SQ FT

The purpose of the FR-3/12,000 Foothills Residential District is to promote environmentally sensitive and visually compatible development of lots not less than twelve thousand (12,000) square feet in size, suitable for foothills locations as indicated in the applicable community Master Plan. The district is intended to minimize flooding, erosion, and other environmental hazards; to protect the natural scenic character of foothill areas by limiting development; to promote the safety and well being of present and future residents of foothill areas; to protect wildlife habitat; and to ensure the efficient expenditure of public funds. The FR-3/12,000 Foothills Residential District is intended for application in most areas of foothills development existing as of April 12, 1995.



Development Examples



Zoning Diagram of Single-family Home

FR-3/12,000 Development Standards for Single-Family Detached Dwellings* (21A.24.040)

LOT WIDTH ①	LOT AREA	FRONT/CORNER SIDE YARD ②	INTERIOR SIDE YARDS ③	REAR YARD ④	HEIGHT ⑤	WALL HEIGHT (FRONT) ⑥	BUILDING COVERAGE
Interior: 80' min Corner: 100' min	Min: 12,000 sq ft Max: 18,000 sq ft ¹	Min. is the average of the existing buildings on block face, or as specified on plat. 20' min. when no existing buildings on block face.	10' min., or as specified on plat	35' min.	Max. 28' to ridge of roof or top of flat roof	Max. 25' on front/corner side/rear facades. Corner lots: Gable ends allowed up to 28' on either the corner/front facade (not both).	Max. 35% of lot can be covered by buildings.

1. Lots exceeding this size may be created through the subdivision process subject to additional standards. See 21A.24.040.J.

2. For buildings legally existing on April 12, 1995, the required front yard is the established setback line of the existing building.

*An accessory dwelling unit or accessory guest/servants' quarters is allowed in addition to the primary dwelling. See ordinance for regulations for other uses, such as places of worship and utility buildings.

Additional General Standards

ATTACHED GARAGE WIDTH AND LOCATION	ACCESSORY BUILDING/ STRUCTURE LOCATIONS	STEEP SLOPE RESTRICTIONS	SPECIAL FOOTHILLS REGULATIONS
May not exceed 50% of the front facade width of the home; cannot project beyond front line of the building. See code for exceptions.	Not allowed in any required yard. Accessory structures allowed where listed in 21A.36.020.	For lots subdivided after Nov. 4, 1994, portions of lots over 30% are not buildable. Buildings/structures must be setback min. 10' and average of 20' from nonbuildable areas.	See additional regulations on development, including driveways, grade changes, landscaping, lighting, retaining walls, and fences in 21A.24.010.P.

The above information is a synopsis of the FR-3/12,000 zoning regulations. The complete zoning regulations are located in [21A.24.040](#)

SR-1

SPECIAL DEVELOPMENT PATTERN RESIDENTIAL DISTRICT

The purpose of the SR-1 Special Development Pattern Residential District is to maintain the unique character of older predominantly single-family and two-family dwelling neighborhoods that display a variety of yards, lot sizes and bulk characteristics. Uses are intended to be compatible with the existing scale and intensity of the neighborhood. The standards for the district are intended to provide for safe and comfortable places to live and play, promote sustainable and compatible development patterns and to preserve the existing character of the neighborhood.



Development Examples

Zoning Diagram of a Single-Family Home

SR-1 Development Standards (21A.24.080)

BUILDING/ USE TYPE	LOT WIDTH	LOT AREA MINIMUM ¹	FRONT YARD ①	CORNER SIDE YARD ②	SIDE YARDS ③	REAR YARD ④	HEIGHT ⑤	WALL HEIGHT (INTERIOR)	BUILDING COVERAGE
Single-family Detached*	50' min.	5,000 sq ft	Min. is the average of the block face, or as specified on plat. 20' min. when no existing buildings on block face ²	10' min. ²	4'/10' min.; corner lots 4' min.	25% of lot depth, but not less than 15', and need not exceed 30'	Max. 28' or average height of other principal buildings on block face; Flat roof max. 20'. ³	Max. 20' at min. side setback, increases 1' for every 1' add. setback. See code for exceptions. ³	Max. 40% of lot can be covered by buildings.
Twin Home	25' min.	4,000 sq ft per unit			0'/10' min.				
Two Family	50' min.	8,000 sq ft			4'/10' min.				
Place of Worship	80' min.	12,000 sq ft			4'/10' min.				
Utility/Other Uses	50' min.	5,000 sq ft			4'/10' min.				

1. Lots exceeding 150% of min. may be created through the subdivision process subject to additional standards. See 21A.24.080.G.

2. For buildings legally existing on April 12, 1995, the required yard is no greater than the setback line of the existing building.

3. See code for exceptions to wall and building height, including for dormer and gable walls.

*An accessory dwelling unit is allowed in addition to the primary dwelling.

Additional Design Standards

ATTACHED GARAGE WIDTH AND LOCATION	May not exceed 50% of the front facade width of the home; cannot project beyond front line of the building. See code for exceptions.
GENERAL RESIDENTIAL REGULATIONS	See additional regulations for development, including lighting, landscaping, and front facade requirements in 21A.24.010.

The above information is a synopsis of the R-1/7,000 zoning regulations. The complete zoning regulations are located in [21A.24.080](#).

ATTACHMENT E: Property & Vicinity Photographs



View of the site, looking north-west from the intersection of F Street and Capitol Park Avenue/13th Ave (Credit: [Google Street View](#))



View looking west down Capitol Park Avenue, showing subject property on the right and the Meridian Condos on the left. (Credit: Google Street View 2022)



View of the site from F Street from the middle of the site, looking west (Credit: Google Street View 2022)



View of the single-family and two-family homes on the east side of F Street, directly across from the site, looking east. (Credit: Google Street View 2022)



View looking north on F Street, toward the entrance to Northpoint Condominiums. The subject property is on the left.



View of the site from Capitol Park Avenue, looking north-east



View of the Meridian Condo building located directly across Capitol Park Avenue from the subject site, looking south. (Credit: Google Street View)



View of the west property line from Capitol Park Avenue, looking north



View of the south side of the property along Capitol Park Avenue from near the middle of the property line, looking west.



Additional view, looking south from near the west end of the property on Capitol Park Avenue.



View of Meridian Condos from the center of the site, looking south.



View of the west side of the property, showing the slope of the property and adjacent FR-3 zoned homes, looking west.



View of the north property line, with townhomes beyond the fence, looking north from the center of the site. This also shows the changing retaining wall height. The wall is lower toward the middle of the north property line but increases near the west end. The tallest portions are on the east end of the property line near the right of the photo.



View of the east side of the property toward F Street, showing trees on site and single and two-family homes in the background across F Street, looking east.



View looking south showing western property line and grade difference between the properties. The grade of the property on the right was lowered to create a flat lot and so the subject property grade is higher.



View of the north-east corner of the site, showing the Northpoint Condominiums entrance.



Additional view of the north end of F Street, with the subject property on the left. One of the Northpoint Condominium buildings is visible on the right. (Credit: [Google Street View](#))



View looking west on F Street near the south-east corner of the site. (Credit: Google Street View)



View looking east from the intersection of F Street and 13th Avenue. (Credit: Google Street View)

ATTACHMENT F: City Master Plan Policies

The below are related policies from adopted City Master Plans. Each plan title is followed by a table where Staff has compiled related policies or discussion text from the associated plan. Some policies may not be directly applicable but have been identified in public or other comments and so have been included below.

In general, there are several citywide policies that support zoning changes that support additional housing opportunities, particularly policies to accommodate additional growth and ensure that housing remains affordable for a wide spectrum of income levels. However, there are also policies in the Avenues Master Plan that the proposal does not align with, particularly regarding the use designation on the “future land use map” (very low density versus low density) and general policies supporting larger lot developments in or near the foothills.

Salt Lake City Housing Plan

Issues/Goals/Objectives	Status in Relation to Proposal	Discussion
<p>Issue: Current Zoning: A third impediment to the creation of more affordable housing is City zoning ordinances. Zoning affects land values, and if unit density is not available then land costs are too high to make affordable housing cost effective.</p> <p>One of Salt Lake City’s main concerns in zoning is a lack of middle income housing options. The current residential multi-family zones (RMF) do not allow for the density to make townhomes, duplexes, and small multi-family developments affordable and financially feasible. Other unit types, such as Accessory Dwelling Units, are also currently prohibited from most areas of the city, in particular areas of high opportunity. Additionally, large sections of the city are zoned for a low-density residential land use pattern that requires lots of at least 10,000 square feet. Allowing for these lots to be subdivided into two buildable lots, could increase the density and housing options in a neighborhood</p>	Consistent	<p>This section of the plan identifies barriers to affordable and middle-income housing. This section speaks to density limits as impacting the availability of such housing. It also points to lot size requirements of 10,000 square feet or more to being a barrier for such development and notes that smaller lots could be developed with buildings that are still in scale with the neighborhood. The proposal would reduce the lot size requirement, but the allowed scale of buildings would remain the same.</p>

without significantly impacting the scale of the buildings.		
Housing Crisis Section Summary: The city is in an affordable housing crisis and if growth projections are correct, it will not improve unless bold and strategic measures are developed and enacted. Solutions must include using zoning ordinance to provide a mix of housing types in an effort to relieve the pressure put upon existing housing, creating sustainable and significant funding sources, preventing and diverting low income families from entering homelessness, and creating innovative housing for all income types.	Consistent	The zoning change would support additional housing types and smaller housing types, that would help relieve price increase pressures on existing housing.
GOAL 1: Increase housing options: Reform city practices to promote a responsive, affordable, high-opportunity housing market	Consistent	Broad goal supports additional housing options to respond to housing needs and demand. Analysis regarding specific objectives/policies within this goal is noted below.
Objective 1: Review and modify land-use and zoning regulations to reflect the affordability needs of a growing, pioneering city	Consistent	The proposed zoning change would increase housing units to help increase the supply of housing in the City and reduce the price increase pressure on existing housing.
1.1.1 Develop flexible zoning tools and regulations, with a focus along significant transportation routes.	Neutral	Though the policy says that transportation routes should be a focus (or a priority), it does not preclude in-fill ordinances elsewhere in the City, which are discussed in the next policy. This is also generally directed at development of new zoning tools, rather than existing regulations.
1.1.2 Develop in-fill ordinances that promote a diverse housing stock, increase housing options, create redevelopment opportunities, and allow additional units within existing structures, while minimizing neighborhood impacts.	Consistent/Neutral	<ul style="list-style-type: none"> This broad language supports in-fill ordinances through the City that increase housing options and a diverse housing stock. The SR-1 zone would support more housing options and housing type diversity (duplexes) than allowed under the FR-3/12,000 zone. The policy also recognizes that the in-fill should minimize

		<p>neighborhood impacts, in other words by being compatible.</p> <ul style="list-style-type: none"> • The area is low to very low density. Additional low density housing options should be compatible with the existing development patterns and have a minimal impact on the neighborhood.
<p>Objective 3: Lead in the construction of innovative housing solutions</p> <p>1.3.1 <i>Lead in the development of new affordable housing types, as well as construction methods that incorporate innovative solutions to issues of form, function, and maintenance.</i></p> <p><i>The Planning Division and HAND will analyze and recommend processes that may allow the city to be more responsive to changing housing demands and trends so that proposals that fit into a neighborhood are easier to realize. Small lot developments, cottage courts, and tiny homes are examples of housing trends that do not meet current zoning regulations but may be appropriate in some situations.</i></p>	Consistent	<p>The additional narrative in this objective (copied on the left) is supportive of additional types of housing developments with smaller lots if “appropriate.” The proposal would allow additional housing types at a scale compatible with the surrounding area, supporting its appropriateness.</p>
<p>Goal 3: Equitable and Fair housing: Build a more equitable city</p> <p>Objective 3: Implement Life cycle Housing principles in neighborhoods throughout the city</p> <p>Plan Narrative: <i>Salt Lake City should be a place where residents are not stifled in their housing choice, because certain neighborhoods are not conducive to their stage of life.</i></p> <p><i>The goal with this objective is to enable a diversity of housing types that responds to housing needs, allowing individuals to stay in their</i></p>	Consistent	<p>The proposed zoning would allow for a mix of housing types (duplex, single-family detached and ADUs) and smaller lot sizes that respond to different housing needs in the neighborhood.</p>

<p><i>communities as their housing needs evolve.</i></p> <p><i>The Kem C. Gardner Policy Institute’s demographic projections show a growing senior population statewide, and while we know from the housing market study that Salt Lake City’s percentage of seniors (10% of total population) is relatively low compared to other municipalities in the state, the City will begin anticipating the needs of a growing senior community. However, seniors are not the only population that is demanding a different type of housing. Across the country there are trends for micro housing, community style living, generational housing to accommodate aging parents, and intentional community and living space that co-exist (like a day care in a Senior Center). There is not one way to achieve life cycle housing, but infinite possibilities and it is the goal to engage the community in way that not only fosters the possibility, but creates policy that allows for the building.</i></p>		
<p>3-3.1</p> <p>Support diverse and vibrant neighborhoods by aligning land use policies that promote a housing market capable of accommodating residents throughout all stages of life.</p> <p><i>Plan Narrative: In order to truly encourage new types of housing that considers cost, energy efficiency, and accessibility, a strong land use and zoning foundation must be laid that supports new types of building. The City must also understand how the type of housing being produced and home prices align with changing household dynamics. An</i></p>	<p>Consistent</p>	<p>The smaller lots and dwelling units allowed by the proposed zone would support the residency of people with relatively lower incomes than would be accommodated with the larger lots of the FR-3/12,000 zone, including a more diverse population of people with varying housing needs at different stages of their life.</p>

<p><i>understanding of housing demand and gaps in the housing market will inform land use decisions and priorities, including the disposition of City owned property.</i></p> <p><i>As resources are aligned a program will be structured that encourages new ways of adaptive re-use or new build through the use of City-owned land and request for proposals. This shift in programming will also closely align with the Housing Innovation Lab as life cycle housing is not just applicable to low-income populations, but for every resident in the City.</i></p>		
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2016 Salt Lake Housing Policy (Housing Policy Statements Adopted by the City Council)

Policy	Status	Discussion
1. Foster and celebrate the urban residential tradition;	Neutral	<ul style="list-style-type: none"> The proposal is close to the urban center, but this policy may be focused on more urban building forms nearer or in the urban center.
2. Respect the character and charm of predominantly residential districts, including those with historic character and qualities, while also providing opportunities for the provision of local goods and services easily accessed by neighborhoods;	Neutral	<ul style="list-style-type: none"> The proposal does not involve commercial uses/local goods and services.
3. Promote a diverse and balanced community by ensuring that a wide range of housing types and choices exist for all income levels, age groups, and types of households;	Consistent	The proposal would add additional small to medium sized housing units to the City that would provide additional diversity of income level, age group, and household type than traditional single-family homes in the neighborhood (duplexes, and single-family detached with ADUs).
4. Develop new housing opportunities throughout the City;	Consistent	The proposal adds additional housing opportunities in the Upper Avenues versus the current zoning in an area where new development with additional housing opportunities is not common.

5. Ensure that affordable housing is available in all neighborhoods and not concentrated in a few areas of the city;	Neutral	The proposal does not involve “income restricted” affordable housing, but the allowed smaller lots would target lower incomes than would otherwise occur with the current zoning.
6. Emphasize the value of transit-oriented development, transit accessibility, and proximity to services;	Neutral	Not applicable, proposal is not in an area served by significant transit or services and is not considered “transit-oriented development.”
7. Recognize that residents, business owners, and local government all have a role to play in creating and sustaining healthy neighborhoods;	Neutral	General statement that is not applicable to proposal.
8. Create an appropriate balance of rental and ownership opportunities in neighborhoods without jeopardizing an adequate supply of affordable housing;	Consistent	Additional ADUs and duplexes may provide additional rental opportunities in an area that is predominantly owner occupied.
9. Strongly incentivize or require the use of green building techniques and sustainability practices in public and private housing developments;	Neutral/NA	This pertains to creating new City regulations and does not apply. The proposal will have to comply with City ordinances and building codes related to sustainability practices and building techniques.
10. Examine the changing needs of Salt Lake City’s population, and develop and maintain reliable demographic information to support housing policy and residential development;	Neutral/NA	This is not directly related to this amendment. However, for Avenues population context, Census data from 1980 shows the Avenues having 16,785 people with 8,119 housing units (2.06 persons per housing unit). The 2020 Census shows 16,157 persons in 8,662 housing units (1.8 persons per housing unit). There was population growth in the western lower Avenues below 6 th Ave and west of I Street (+270) but decline in all other areas. Between ~6 th and 13 th Ave, there was a decline of 389 persons. For the area that includes both above 13 th and east of Virginia Street, there was a decline of 161 persons, and for the area below 6 th between I and Virginia Street, there was a decline of 348 persons. There has been a large decline in the under 18 population. In 1980 this population was 3,419 persons, in 2020 this was 2,373.
11. Consider the needs of multi-generational households and	Consistent	The proposed zoning would allow more ADUs than allowed under current zoning. ADUs provide more affordable housing options for

ensure housing products are available to meet those needs.		multi-generational households, including for adult children and older parents.
12. Address the livability of neighborhoods and concentrations of ageing adults, and plan and implement strategies that will allow residents to Age in Place.	Consistent	The proposal would allow for additional ADUs and smaller homes sizes than would be allowed or generally result under the current zoning. ADUs provide additional options for older adults with lower incomes to remain in their neighborhood, by either moving into an ADU or renting an ADU for income.

Avenues Master Plan (1987)

Residential Land Use Goals	Status	Discussion
The principal goal for the Avenues Community expressed by city policy-makers and concerned citizens, is to ensure that the Avenues Community remains a desirable place to live. We must direct future growth and development so that the quality of lifestyle and community scale are maintained.	Consistent	<ul style="list-style-type: none"> The scale of the proposal is generally in-line and compatible with the low density and low building scale of the surrounding area. Much of the Avenues is zoned a similar designation, SR-1A.
Update Land Use: <i>Recommended land use patterns are identified on the Master Plan Map (see page 7). Deviations from the 1979 Master Plan Map are the result of either zoning changes since the adoption of the original Avenues Community Plan, or land use policy changes in a few areas of the community.</i>	Not Consistent	<ul style="list-style-type: none"> The original Future Land Use map in the Master Plan calls for “very low density (0-4 units per gross acre)” on the property. The Future Land Use map was officially replaced by the zoning map in 1995 with the adoption of the City’s overhauled zoning map by Ordinance 26 of 1995, which stated the following: <i>New Title 21A, Zoning Ordinance and the new Zoning Maps amend the land use and zoning policies of all previously adopted master plans of the City. All existing adopted master plans should be construed and interpreted to conform to the new Zoning Ordinance and Zoning Maps.</i> In general, all “very low-density” properties in the Avenues Master Plan are zoned and correspond with the FR-3/12,000 zone. The current FR-3/12,000 zoning of the property would allow for 3.63 units per acre or 7.26 units per acre, counting allowed ADUs as dwelling units. The areas designated as “low density” on the Avenues map are generally zoned SR-1A.

		<ul style="list-style-type: none"> • The adjacent SR-1A zoning allows for 17.4 dwelling units per acre (counting allowed ADUs as dwelling units, 8.7 du/ac without) and corresponds with the areas designated as “low density” in the Master Plan map. • The proposal is the SR-1 zone, which has the same density allowance as the SR-1A zone.
<p>Reduce Building Height Potential:</p> <p><i>Many of the incompatibility problems created by new construction in residential areas are associated with excessive building height; new dwellings that tower over adjacent homes, and second-level or rear additions that overwhelm the original structure. A recently adopted ordinance will reduce height potential in areas encompassed by the "F-1" Foothill Development Overlay Zone. This "view protection" clause will limit building heights to a 25 foot maximum height for a flat-roofed structure and 30 feet to the peak of a structure with a pitched roof.</i></p> <p><i>As depicted in the accompanying figure, areas encompassed by the "F -1" Overlay are limited to foothill subdivisions along the urban fringe. If these height limitations prove to be successful in accomplishing their intended purposes in the "F -1" areas, similar height restrictions may be considered for other "R-1" and "R-2" areas in the Avenues Community.</i></p>	Consistent	<ul style="list-style-type: none"> • The Foothills Residential FR-3/12,000 zone has height restrictions generally consistent with plan’s policies for the Foothills areas (formerly designated within the F-1 overlay pre-1995). The FR-3 zone allows for development up to 28' in height. • The proposed SR-1 zone has a maximum of 28' for a pitched room structure or 20' for a flat roofed structure. This is lower than the thresholds noted by this Master Plan policy.
<p>Increase Lot Area Requirement</p> <p><i>The city should consider increasing lot area requirements for duplexes in the "R-2" Zone to 7,000 or 8,000 square feet, with a minimum usable open space requirement of at least 600 square feet per unit in the rear yard.</i></p> <p><i>The present 6,000 square foot minimum lot-area requirement is not adequate for the typical two-family structure. The structure and required four parking stalls generally consume all but minimum required yard areas. This encourages greater building heights to compensate</i></p>	Consistent/ Neutral	<ul style="list-style-type: none"> • The R-2 zone formerly covered most of the Avenues below 13th Ave. The zoning was changed to SR-1 in 1995 and the zone then required 8,000 square feet for duplexes. • The proposed zoning of SR-1 still requires 8,000 square feet for duplexes.

for less ground level square footage, and often results in a congested appearance, no usable open space in the rear yard, and general incompatibility with neighboring structures. (Usable open space is defined as areas that are completely free and unobstructed from any structures including driveways and parking areas.)		
Additional Zoning for Multiple-Family Dwellings As a general policy, additional zoning changes to accommodate higher density multiple-family dwellings in the Avenues are not desirable. There is ample zoning in the Avenues to accommodate multiple-family dwelling needs for the foreseeable future.	Consistent	<ul style="list-style-type: none"> The proposed zone doesn't allow for multi-family development.
Foothill Development Section		
Foothill Development and Protection <i>Planning Goal</i> Preserve the city's natural mountainous backdrop and recreation opportunities the mountains provide. Devise a growth management program that includes strategies to help protect the foothills from continued urban encroachment.	Consistent /Not applicable	The proposal does not result in further urban encroachment into the foothills. The property is surrounded by existing development.
Density of Future Foothill Development Avenues residents participating in the community planning process strongly support increasing lot area requirements for future subdivisions in the foothills above the Avenues. Geologic and other physical problems in sloping foothill areas are among the reasons most commonly given for justifying increased yard area requirements. City personnel involved in the development approval process agree that present ordinances often permit developments with insufficient lot sizes, yard area requirements and so forth. It is very difficult to properly develop a small lot on steep topography. A larger lot is necessary to solve drainage and access	Varies, Not Consistent / Consistent / Neutral	<ul style="list-style-type: none"> This section is a discussion on input received from the community supporting larger lot sizes in the "foothills above the Avenues." Policy direction is included at the end where it notes the City should consider clarifying the Commission discretion in determining minimum lot sizes. The Commission and City Council have discretion through the Planned Development and Zoning Amendment process to determine the appropriate size of lots. The policy direction notes that in general future lot sizes should be larger than that developed in the past. However, it is unclear what size this was referring to as the lots in the example case (Federal Heights Circle) are generally close to an acre or over an acre. There are many

<p>problems, and to allow enough yard area for proper grade transition to neighboring properties. Small lots on steep slopes must be developed with the extensive use of retaining walls and other mitigating measures to compensate for inadequacies of the lot.</p> <p>Recent developments in the foothills also show evidence of an increasing demand for more spacious "estate" type lots in the few remaining development areas in the foothills. The foothills above the Avenues have become one of the most desirable and prestigious areas in the Salt Lake Valley for single-family home development.</p> <p>Homes have become increasingly large, and foothill subdivisions increasingly exclusive in the last few years. Homes in the most recent subdivisions, such as those on Federal Heights Circle, are much larger than the lots are designed to accommodate. Large homes on small lots with minimal yard areas tend to create a congested appearance detracting from the area's natural setting. Larger lots should be required where large structures are anticipated. Larger lots in the foothills will also respond positively to the following concerns expressed by Avenues residents:</p> <ul style="list-style-type: none"> • Traffic congestion in the lower Avenues; • Street design in the lower Avenues that cannot accommodate increasing traffic volumes; • Problems imposed on neighboring properties such as loss of views; and • Visual appearance of the foothills from areas below. <p>The city should consider an ordinance clarifying and increasing the Planning Commission's discretion in determining the minimum size of lots in foothill subdivisions. In some areas where slope and other geologic problems are prevalent, or in exclusive areas where "estate" type developments are anticipated, lot sizes approaching an acre may be appropriate.</p>		<p>areas of the Avenues next to significant slopes that create large areas of property that are undevelopable. This is not one of them, as the lot has a generally consistent gradual slope.</p> <ul style="list-style-type: none"> • The lot is similarly sloped to other blocks of the Avenues that are zoned SR-1A, low-density residential. • The proposed zoning does allow for smaller lot sizes with lower setbacks than would be allowed under the FR-3 zoning, one of the successors to the F-1 overlay. • The Planning Commission has discretion in approving modifications to individual lot sizes through the Planned Development process, which would be required for the developer's submitted proposal.
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<p>In other areas, smaller lots may be more suitable. In general, future lot sizes in these sensitive foothill areas should be larger than those that have developed in the past, and minimum side and rear yards should also be increased in response to the concerns stated above.</p> <p>The city should consider modifying the Site Development Ordinance and the "F - 1" Overlay Zone to reflect the recommended changes. Also, the "F-1" Overlay Zone should be expanded into all areas of concern, to provide for more spacious foothill developments in the future.</p>		
<p>Transportation Section</p> <p><i>Recommendation and Strategies</i></p> <p><i>Major Street Plan Discussion Excerpt</i></p> <p>In the Avenues and many other older residential neighborhoods of Salt Lake City, all of the streets are residential streets, whether they are classified as local, collector, or arterial. This is in marked contrast to more recently planned neighborhoods where streets are not designed to serve both as frontages for residential development and as conduits for automobile traffic. Since we don't have the luxury of designing a circulation system around our older "close-in" neighborhoods in Salt Lake City, we must be very sensitive to problems associated with traffic movement through these areas.</p>	<p>Neutral</p>	<p>There is not a direct policy statement in this section except to be cognizant of traffic impacts to the Avenues street network. The proposal is a low-density residential use. Low density residential uses generally have a limited traffic impact on streets.</p>
<p>Health Services Section</p>		
<p>From the planning standpoint, land use at the Primary Children's Hospital and BYU Education Center properties should be low-density residential. These properties are on the fringe of a low-density residential community. Access to these sites is through narrow residential streets traversing relatively steep topography and there are no retail services or other facilities to support uses other than residential.</p>	<p>Consistent</p>	<ul style="list-style-type: none"> • The property was part of the BYU Education Center site as identified on the Avenues Master Plan (historically part of the overall Veterans Administration Hospital site). • The policy supports "low-density" residential for the site. • The proposed SR-1 zoning would allow for low-density residential development. Low density was identified in the plan as ~4-8 units per acre by the original master plan, which would be ~8-16 units

		considering the current Citywide ADU allowance.
<p>(Staff Note: The Avenues Plan notes in this section that “Policies and provisions outlined herein for the Primary Children’s property should be generally applicable to the BYU Education Center Site...” As such, the policies for the Primary Children’s Hospital are below.)</p> <p>If a low density residential zone is adopted for the Primary Children’s Hospital, evaluation of proposed uses should include the following:</p> <ul style="list-style-type: none"> • Avenues Community Council review and comment; • City Council review and approval; and • Planned Unit Development and/or conditional use approval through the City Planning Commission and Board of Adjustment as appropriate. <p>These steps should be taken whether the proposed use involves redevelopment for low density housing, low density elderly housing with a health care component, or use of existing buildings for a residential health care facility.</p> <p>Intermountain Health Care representatives, Avenues Community residents, and the city should work together, through the approval process outlined above, to seek a mutually acceptable solution to the future use of this property.</p>	<p>Consistent /Not Consistent</p>	<ul style="list-style-type: none"> • The rezone is following the City consideration and adoption process as outlined here. • The Avenues Community Council provided a letter in opposition to the rezone.
<p>Guidelines For Redevelopment For Low Density Housing (For Primary Children’s Hospital and BYU Education Center)</p> <ul style="list-style-type: none"> • Intensity of any new use, whether new occupancy of existing buildings, or redevelopment and new construction, must be less intensive than present use levels with regard to the number of persons occupying the site, parking needs, and estimated traffic generation. 	<p>Consistent</p>	<ul style="list-style-type: none"> • The SR-1 zone is consistent with the low-density called for in this section of the plan. • The design and scale of buildings that could be constructed according to the SR-1 regulations is low-scale and compatible with other low-scale residential development. • The zoning limits structures to two stories in height and is under the original height allowances of the F-1 overlay. • The homes along F Street are required to be oriented to the street by the zoning.

<ul style="list-style-type: none"> • Any use involving additions or expansion of existing buildings, or construction of a new building(s) will be limited to low density housing. • The design and scale of new construction should have a low-density residential appearance and must be compatible with surrounding low density residential uses. • There should be no variance from building height limits imposed by view protection provisions of the "F-1" Overlay Zone. Structures should be limited to two stories in height. • New structures adjacent to public streets should be oriented to the street with a sense of entry through front facades. 		
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Plan Salt Lake

Plan Salt Lake City is a City-wide master plan that addresses growth, housing and preservation. This master plan is broad and not property specific.

Plan Salt Lake	Status	Discussion
Neighborhoods/ Neighborhoods that provide a safe environment opportunity for social interaction, and services needed for the wellbeing of the community therein. <ul style="list-style-type: none"> • Maintain neighborhood stability and character. • Support neighborhoods and districts in carrying out the City's collective Vision. • Support neighborhood identity and diversity. • Support policies that provides people a choice to stay in their home and neighborhood as they grow older and household demographics change. 	Consistent	The proposal is a low scale single-family development in a low-scale single-family neighborhood. The use and zoning support neighborhood stability and character. The zoning will provide additional housing options for residents as they grow older or household demographics change.
Growth/ Growing responsibly, while providing people with choices about where they live, how they live, and how they get around. <ul style="list-style-type: none"> • Locate new development in areas with existing 	Consistent	<ul style="list-style-type: none"> • The proposed development is located in an area with existing infrastructure, such as sidewalks, roads, utilities, and amenities, such as parks and trails. • The zoning will promote infill development of an underutilized, vacant parcel.

<p>infrastructure and amenities, such as transit and transportation corridors.</p> <ul style="list-style-type: none"> • Promote infill and redevelopment of underutilized land. • Accommodate and promote an increase in the City's population. 		<ul style="list-style-type: none"> • The SR-1 zoning will accommodate and promote an increase in the City's population to a greater extent than the current FR-3 zoning.
<p>Housing/ Access to a wide variety of housing types for all income levels throughout the city, providing the basic human need for safety and responding to changing demographics.</p> <p><i>Discussion</i></p> <p>Almost half of the total housing units in Salt Lake are single-family detached dwellings. While preserving the existing housing stock will continue to be a priority for Salt Lake City, over the next 25 years, it will be critical for us to encourage and support a diversity of new housing options and types with a range of densities throughout the City to best meet the changing population.</p> <p><i>Policies</i></p> <ul style="list-style-type: none"> • Ensure access to affordable housing city wide (including rental and very low income). • Increase the number of medium density housing types and options. • Encourage housing options that accommodate aging in place. • Direct new growth toward areas with existing infrastructure and services that have the potential to be people-oriented. • Enable moderate density increases within existing neighborhoods where appropriate. 	Consistent/Neutral	<ul style="list-style-type: none"> • The proposed SR-1 zone would allow for smaller, denser single-family or two-family development than would be allowed with the current FR-3 zone. • The proposal would increase the number of housing types and options in this neighborhood by providing additional options than would be allowed under the current zone. • Smaller home sizes and accessory dwelling units support aging in place and opportunities to downsize while still living in the same neighborhood. • The development is in an area with existing infrastructure to support a single-family development. • The proposed density is a low-density zone and would be a moderate increase from the very low density zone.
<p>Beautiful City/A beautiful city that is people focused.</p> <ul style="list-style-type: none"> • Reinforce and preserve neighborhood and district character and a strong sense of place. 	Consistent	<p>The proposed zoning would support single-family development in a neighborhood predominantly occupied by single-family development and that would be in scale with the surrounding neighborhood.</p>

<p>Preservation/Maintaining places that provide a foundation for the City to affirm our past.</p> <ol style="list-style-type: none"> 1. Preserve and enhance neighborhood and district character. 2. Retain areas and structures of historic and architectural value. 3. Balance preservation with flexibility for change and growth. 	<p>Consistent/Not Consistent/Neutral</p>	<p>The site isn't historically designated; however, the zoning will support development in scale and with similar setbacks to nearby properties – those factors being a part of neighborhood character. Some of the mature trees on the site contribute to the character of the neighborhood, however, these may be removed with development.</p>
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ATTACHMENT G: Analysis of Standards – Zoning Map Amendment

ZONING MAP AMENDMENTS

21A.50.050: A decision to amend the text of this title or the zoning map by general amendment is a matter committed to the legislative discretion of the city council and is not controlled by any one standard. In making a decision to amend the zoning map, the City Council should consider the following:

1. Whether a proposed map amendment is consistent with the purposes, goals, objectives, and policies of the city as stated through its various adopted planning documents;

Finding: The proposal is generally consistent with City plans, excepting the future land use map for the Avenues Master Plan.

Discussion:

The proposal is generally consistent with City plans, excepting the future land use map for the Avenues Master Plan. Please see [Attachment F](#) for applicable City master plan policies and discussion as well as [Consideration 3](#). The applicant is requesting an amendment to the future land use map in the Avenues master plan.

2. Whether a proposed map amendment furthers the specific purpose statements of the zoning ordinance.

Finding: The proposal generally furthers the purpose statements of the zoning ordinance.

Discussion:

21A.02.030 General Purpose and Intent of the Zoning Ordinance

The purpose of the zoning ordinance is to promote the health, safety, morals, convenience, order, prosperity, and welfare of the present and future inhabitants of Salt Lake City, to implement the adopted plans of the city, and, in addition:

- A. Lessen congestion in the streets or roads;*
- B. Secure safety from fire and other dangers;*
- C. Provide adequate light and air;*
- D. Classify land uses and distribute land development and utilization;*
- E. Protect the tax base;*
- F. Secure economy in governmental expenditures;*
- G. Foster the city's industrial, business and residential development; and*
- H. Protect the environment.*

The development generally supports or has no appreciable impact on these purposes. The proposal fosters the City's residential development and broadens the tax base by supporting more residents in the City. There may be additional traffic caused by this development, but staff does not anticipate "congestion" on streets or roads as a result of the development.

The amendment supports residential development in an existing area zoned for residential surrounded by development, rather than extending further into the foothills. The proposed development provides sufficient light and air for residents. The development will meet all necessary Fire Codes to ensure its access by City Fire services and safety from fire.

Zoning District Purpose

The purpose statement of the proposed SR-1 zone is: The purpose of the SR-1 Special Development Pattern Residential District is to maintain the unique character of older predominantly single-family and two-family dwelling neighborhoods that display a variety of yards, lot sizes and bulk characteristics. Uses are intended to be compatible with the existing scale and intensity of the neighborhood. The standards for the district are intended to provide for safe and comfortable places to live and play, promote sustainable and compatible development patterns and to preserve the existing character of the neighborhood.

The proposed rezone will allow for development of single-family dwellings of a scale and intensity that is compatible with the neighborhood. The property is surrounded by multiple zones, including the FR-3 and RMF zones.

21A.50.010 Purpose Statement

The zoning amendment section of the ordinance notes the following with regard to its purposes:

The purpose of this chapter is to provide standards and procedures for making amendments to the text of this title and to the zoning map. This amendment process is not intended to relieve particular hardships nor to confer special privileges or rights upon any person, but only to make adjustments necessary in light of changed conditions or changes in public policy.

The developer is requesting additional development rights through this zoning amendment. The proposal will confer additional rights on the property owner; however, staff believes that adjustments are warranted given changed conditions and changes in public policy.

Regarding these changed conditions, the subject property was zoned FR-3/12,000 in 1995, which was over 25 years ago. The City and region have changed significantly since that time, particularly with regard to housing demand and availability. The City has adopted Citywide policy documents, including with Plan Salt Lake and the City's housing plan, that speak to these changed conditions, particularly regarding providing more housing in general and affordable housing. There is a very high demand for new housing, and this has resulted in substantial price increases across the entire housing spectrum. There are likely multiple factors in housing price increases, but demand is a significant one.

The developer is proposing to build market rate, unsubsidized housing, and would not be considered "affordable housing," which is generally housing that is at most affordable to people with incomes at 80% or below of area median income. However, building more market rate housing will increase the overall supply and help to relieve price pressures on other existing more affordable properties. Not responding to significant demand with

corresponding supply increases will result in price increases and this will increasingly price out even middle-income earners from living in the City. Given the City policies regarding additional housing and the current market conditions, staff believes adjustments are necessary in light of changed conditions and changes in public policy.

3. The extent to which a proposed map amendment will affect adjacent properties;

Finding: The proposed SR-1 zone will impose different regulations on development than the adjacent FR-3 zone on the west. However, the proposed zone will allow for low-scale residential development that will generally be compatible with adjacent low-scale properties due to their similar scale allowances and have minimal negative impacts. Recommended conditions related to rear setbacks/yards where the SR-1 zone will directly interface with FR-3 zoned private yards are noted in [Consideration 1](#). Additional analysis regarding density context is in [Consideration 2](#).

Discussion:

The major differences between the zones are the rear setback requirements and lot size/density limits. The proposed zone increases the development potential of the property from 11 single-family home lots to 27 single-family home lots (from a minimum 12,000 square foot lot size requirement to a 5,000 square foot lot requirement). Additional density will bring additional traffic, but as the provided traffic study notes this will be a low level of traffic with minimal impacts to adjacent streets. The density of the proposal is found in other areas of the Avenues and exists compatibly with lower density housing. Please see [Consideration 1](#) for additional analysis regarding compatibility and recommended conditions regarding rear setback requirements where the zone will interface with FR-3 zoned private yards.

4. Whether a proposed map amendment is consistent with the purposes and provisions of any applicable overlay zoning districts which may impose additional standards;

Finding: The map amendment doesn't conflict with any overlays that affect the property.

Discussion:

The property is not located within an overlay that would impose additional standards on the residential uses allowed on the property.

5. The adequacy of public facilities and services intended to serve the subject property, including, but not limited to, roadways, parks and recreational facilities, police and fire protection, schools, stormwater drainage systems, water supplies, and wastewater and refuse collection.

Finding: The City's public facilities and services have adequate capacity to serve the additional dwellings that would be allowed with this rezone.

Discussion:

Roadways

The developer provided a traffic study that evaluated the impact of development of this property on the adjacent roads and intersections under the SR-1 zoning scenario. The report

did not identify any significant impacts on the adjacent roadways. The report was reviewed by the Transportation Division, and they did not have any concerns with its conclusions. The roadways and intersections are adequate to serve the development and will continue to operate at a high level of service and the proposal will have minimal impacts.

Parks and Recreation Facilities

The proposal is in an area of the City with a high level of park access that are adequate to serve additional residents:

- Kay Rees Park (<1/4 mile)
- 11th Avenue Park (~3/4 mile)
- Lower City Creek Loop/Bonneville Shoreline Trail (~1/2 mile)

Police and Fire Protection

The development is located within an existing developed area with dedicated police and fire services. The services are adequate to serve additional residents.

Concerns were provided regarding additional on-street parking on F Street that would result from additional residences on this property. The paved roadway is currently approximately 36' and will continue to be a minimum of 36' in width with any development, providing room for parking on both sides of the street, while maintaining a minimum 20' width of clearance for fire and emergency vehicles. This is the City's standard with for local residential streets and is the generally the configuration throughout the Avenues.

Schools

The property is located within 3/4 mile of Ensign Elementary School. Bryant Middle School is located at the bottom of the Avenues on South Temple, about 1.5 miles from the property. Recent Salt Lake City School District data indicates that enrollment has been declining in these school with projections anticipating further declines.² The schools have adequate capacity to serve additional students.

Library

The Corinne and Jack Sweet Library Branch is located approximately three blocks from the proposal. The limited number of additional residents served by the library would not create an adequacy issue.

Water/Sewer/Storm Drainage

Public Utilities has reviewed the proposal and did not identify any concerns with adequacy of utilities to serve the property. If any deficiencies are identified in being able to serve the property in more detailed reviews of any subsequent permits, Public Utilities can require the developer to upgrade public facilities that serve the property.

Refuse Collection

Development may be served by the City's Recycling and Waste Services or a private waste service. The small number of potential dwellings served would not have a substantive impact on the City's services level.

² For data sets, see <https://www.slcschools.org/schools/district-demographics> and <https://www.sltrib.com/news/2022/01/20/salt-lake-city-booms-its/>.

In general, the site is located within a developed area of the City and has zoning with a similar development potential to the zoning being proposed. The change of zoning is not likely to increase the need for roadways, parks, recreation facilities, police, fire protection, or schools. Any future development would be reviewed by the Public Utilities department and if additional water or sewer capacity is required to serve the property, the owner/developer would need to make the necessary public improvements.

ATTACHMENT H: 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:

May 2020: Early notification/online Open House notices first mailed out for petition

- Petition requested the FB-UN1, Form Based Urban Neighborhood 1 zone. Proposed 25 single-family homes with accessory dwelling units in a concept plan.
- Notices were mailed to property owners/residents within ~300 feet of the proposal
- 45-day public input notice provided to community council
 - Applicant met with Greater Avenues Community Council at July 1 meeting
 - Community Council subsequently provided letter opposed to the request
- 175 letters/e-mails received in response to proposal.
 - 170 letters opposed, 9 letters in support.
- Over 2,000 signatures received on petitions opposing the rezone

February 2021: Update to proposal received and posted online

- Concept proposal reduced to 20 lots.
- Update sent to community council and those who had contacted staff during initial outreach.
- Approximately 190 letters received in opposition. 4 letters received in support.

March 2021: Change to requested zone

- Applicant provided update to the requested zone, changing the request to the SR-1 zone
- Update sent to community council and those who had contacted staff during initial outreach
- Applicant met with Greater Avenues Community Council on April 7th
- Community council provided additional letter noting opposition to request

November 2021: Planned Development and Subdivision Applications Received

- Early notice sent to community council, property owners/tenants within 300 feet of the proposal, and those who had previously contacted staff regarding the proposal.
- Applicant and staff met with Greater Avenues Community Council on January 5th
- Community council provided letter in opposition
- Approximately 276 additional letters received in response to noticing. 4 of the letters were in support and the others were in opposition.

Notice of the public hearing for the proposal included:

- Public hearing notice mailed on June 9, 2022

- Public hearing notice e-mailed to interested parties June 9, 2022
- Public hearing notice posted on June 9, 2022
- Public notice posted on City and State websites and Planning Division list serv on June 9, 2022

Public Input:

All of the public comments received are included in [Attachment K](#), including those from local recognized community organizations. Staff has identified some of the key frequently repeating concerns in [Consideration 6](#) and also included a more extensive list below:

- Incompatibility of allowed density with surrounding density
- General traffic impacts to streets, including to safety
- Negative impacts to property values
- Negative impacts to school enrollment
- Lack of family-oriented housing
- Lack of yards
- Fairness to neighborhood if long standing zoning is changed
- Impacts to on-street parking
- Incompatibility of grade changes
- Incompatibility of structures
- Incompatibility of setbacks
- Concerns with developer
- Concerns with loss of mature trees
- Concerns with pollution from cars
- Concerns with Fire Department access and fire evacuation access on F Street
- Concerns with loss of open space
- Concern with loss of wildlife habitat, including for a hawk nest and deer grazing

ATTACHMENT I: Department Review Comments

Engineering

Prior to performing work in the public way, a Permit to Work in the Public Way must be obtained from SLC Engineering by a licensed contractor who has a bond and insurance on file with SLC Engineering.

Planning Staff Note: Subdivision process will be required for the property and all normal City street improvements will need to be installed for F Street, including sidewalk, park strips, and curb/gutter.

Public Utilities

No objections to proposed zone change.

- The property currently has water service with one 2" meter. There is currently no sewer service to the property.
- There is adequate sewer and water capacity in the system however they will need to install sewer mains to provide service to the majority of the properties.
- Because the property is greater than 2 acres a complete technical drainage study will be required including stormwater detention. Offsite drainage improvements may be required. A complete stormwater pollution prevention plan will also be required.
- Streets should be public streets to allow for public water and sewer mains. If private streets are requested - master metering, fire meters and private sewer mains may be required.
- ADUs must meet all public utility requirements.

Fire

Planning Staff Note: The City Fire Prevention Bureau does not normally weigh in on zoning map changes. However, they were provided information on the zoning change and the development plans and were asked if they had any input on the change to the zoning change. The Bureau noted that they do not have any official comments or concerns with the proposed zoning change, noting that "Any development is subject to code requirements and the SLC Building Department and SLC FPB are committed to ensuring that the adopted codes are followed."

The City's Fire Code review staff normally reviews all plans to ensure they comply with Fire Code. As proposed, the subdivision plans currently appear to comply with the relevant Fire Codes. More detailed code compliance will be ensured if the zoning change is approved, and final building plans are provided to their office.

Transportation

I have reviewed the TIS (Traffic Impact Study) and things look fine. Please let me know if you have any questions.

ATTACHMENT J: Supplemental Maps

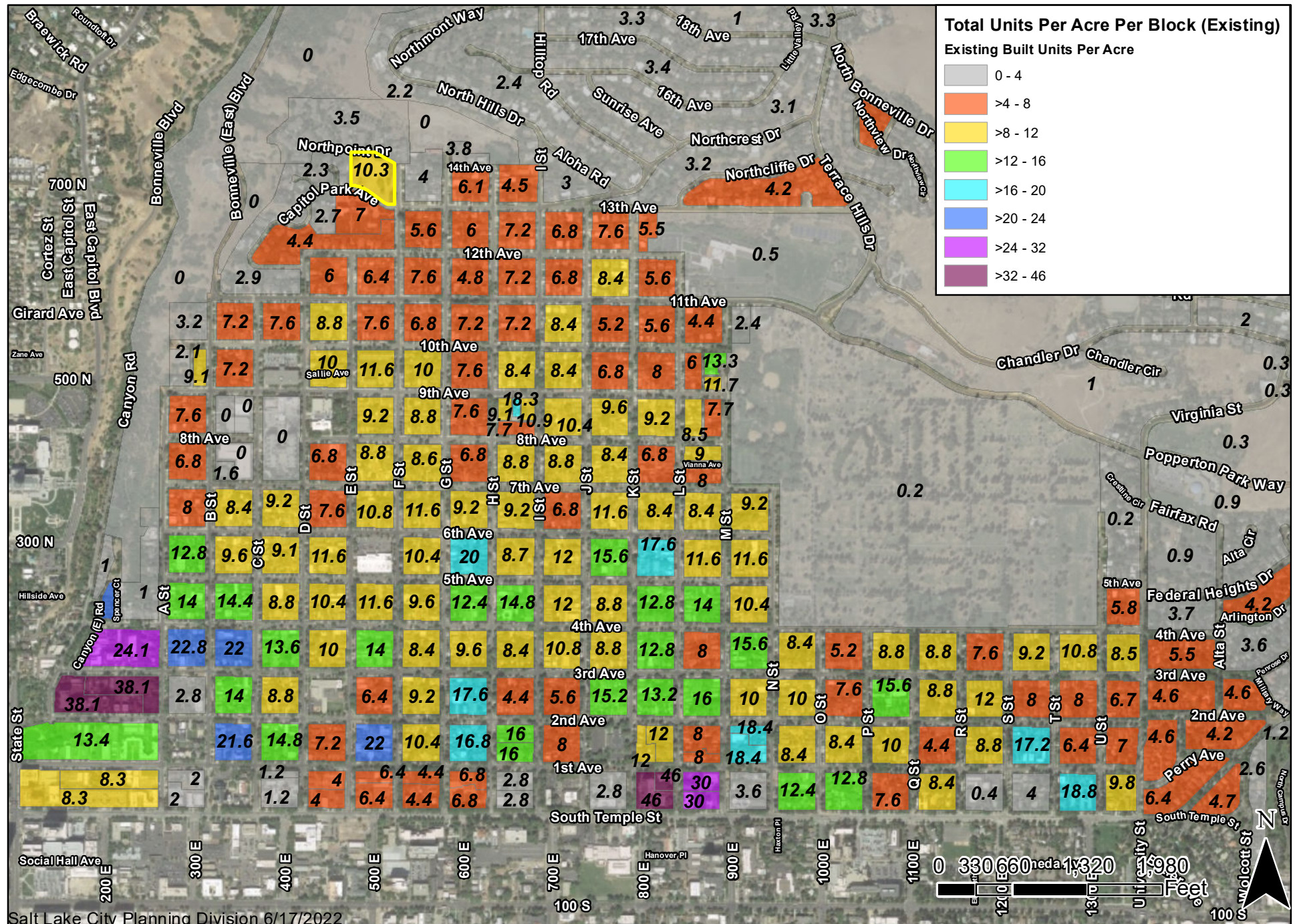
J.1: Existing built densities per block

J.2: Allowed densities per block with ADUs by zoning

J.3: Allowed densities per block without ADUs by zoning

J.4: Traffic accident map

J.1 Existing Built Densities Per Block



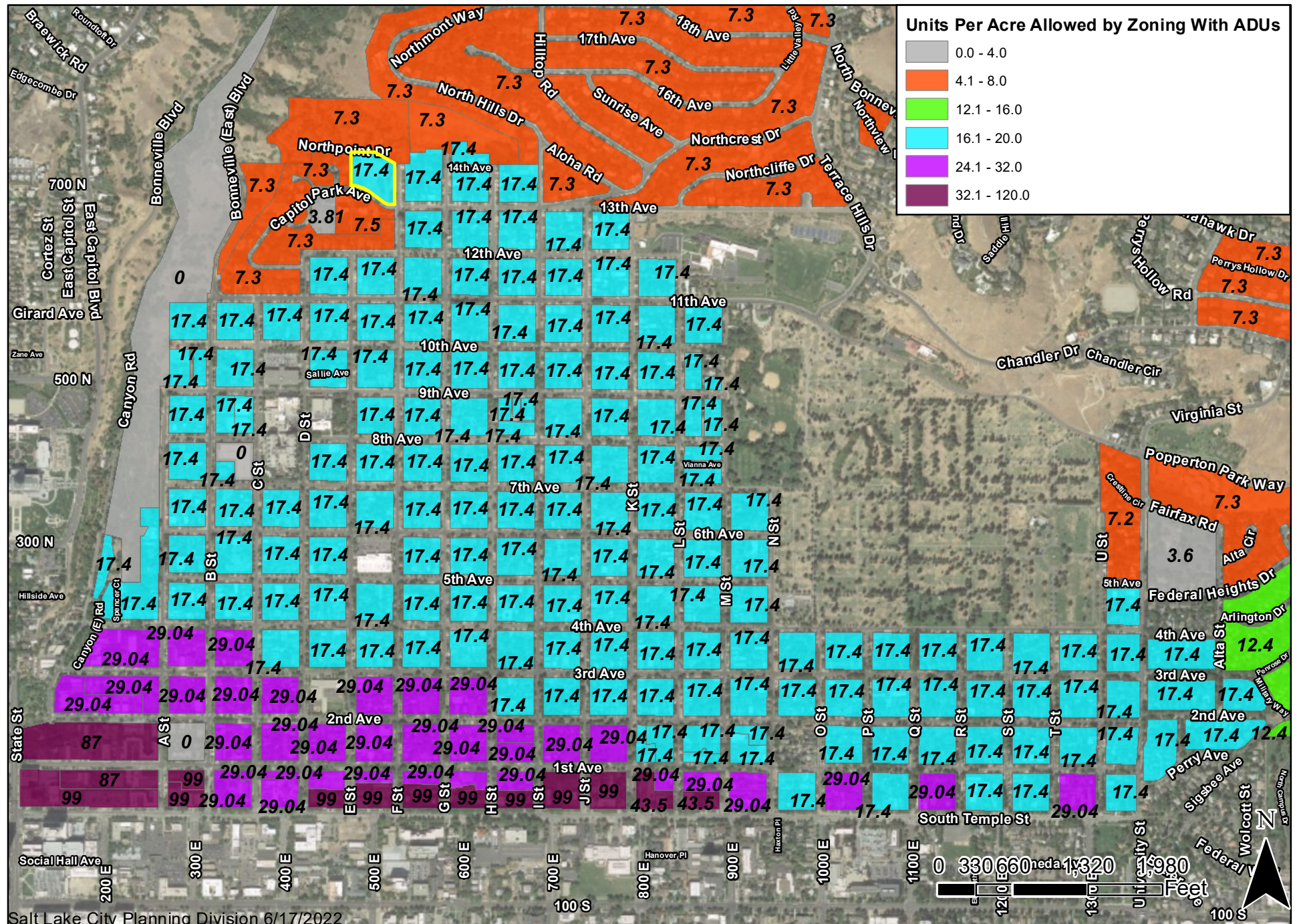
Salt Lake City Planning Division 6/17/2022

*This map is based on Salt Lake County Assessor data and may undercount existing ADUs which are often not included in assessment data.

6/17/22

*Map shows density of subject site with density from concept plan.

J.2 Densities Per Block Allowed by Zoning With ADUs

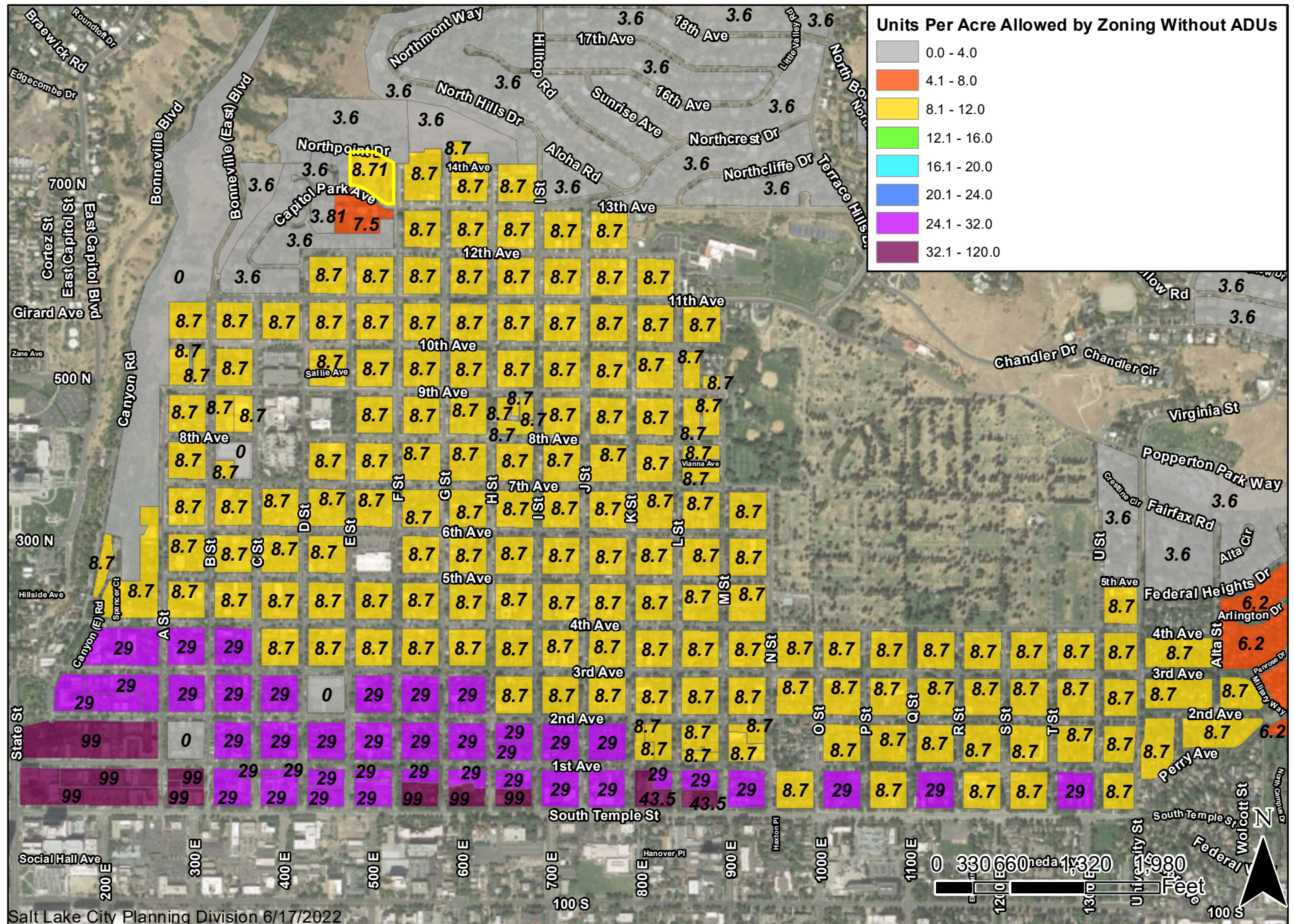


Salt Lake City Planning Division 6/17/2022

*Map shows density of subject property with proposed zoning, not current zoning.⁹¹

6/17/22

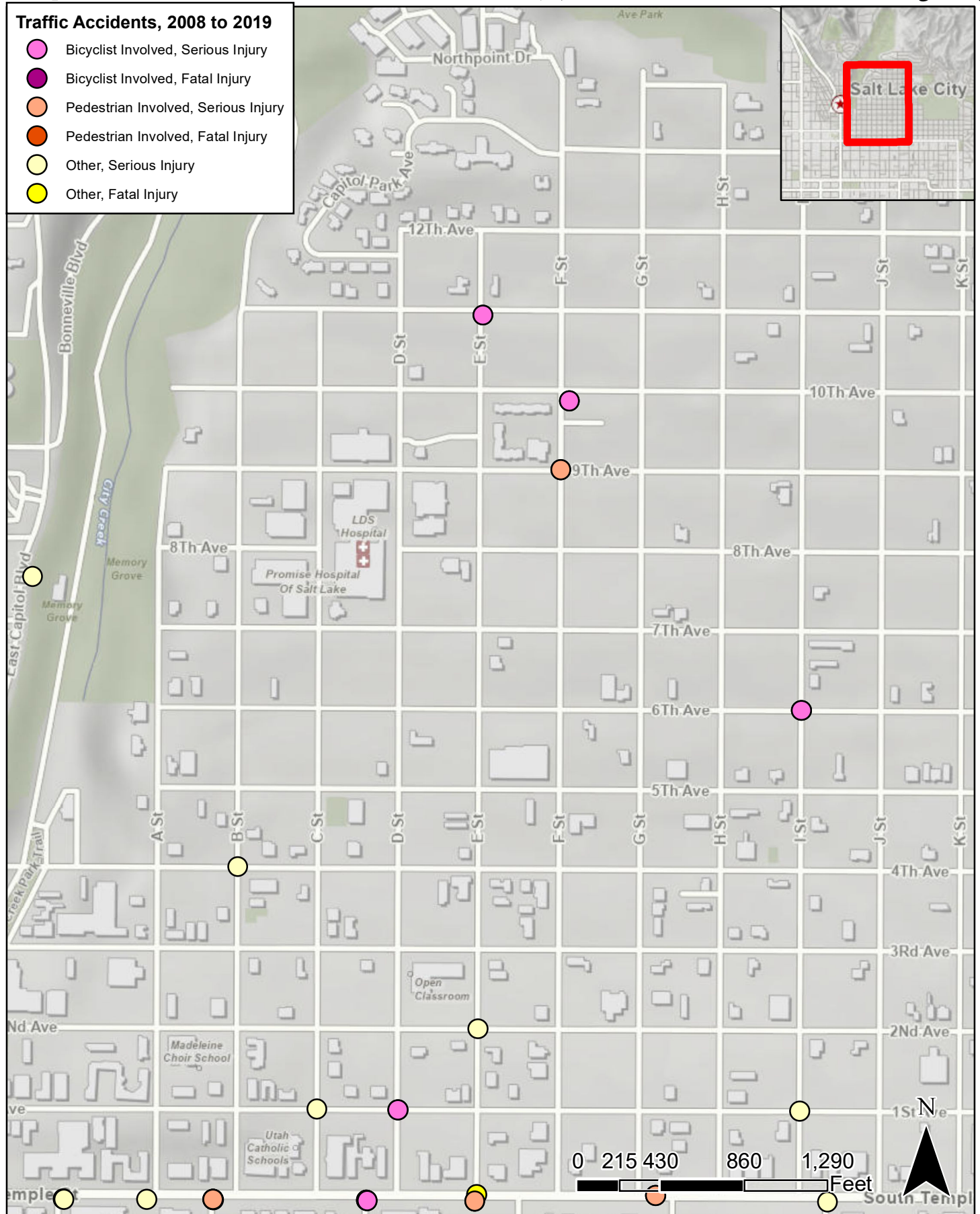
J.3 Densities Per Block Allowed by Zoning Without ADUs



*Map shows density of subject property with proposed zoning, not current zoning.⁹²

6/17/22

J.4 Traffic Accidents 'o8 to '19, Serious or Fatal Injury



ATTACHMENT K: Public Comments

Due to the number of public comments and length of the attachment, this attachment is available in separate PDFs. Please see those PDFs for the content of this attachment.

Comments are generally organized by public input cycle and by date received within that comment period. Please note that many of the comments pertain to development plans and site configuration and those are more relevant to the Planned Development and Subdivision requests that are not before the Commission for consideration at this time. However, much of the feedback pertains to the zoning/master plan amendment as well and so is provided for the Commission's consideration.

K.1: Recognized Community Organization letters (Greater Avenues Community Council and Preserve Our Avenues Zoning Coalition)

K.2: November 2021 Noticing Public Input up to Staff Report Publication (Planned Development/Subdivision input)

a. All letters

b. Support letters

K.3: February & March 2021 Noticing Public Input (Updated SR-1/20 lot request input)

a. All letters

b. Support letters

K.4: May 2020 Noticing Public Input (Initial FB-UN1/25 lot request input)

a. All Letters

b. Support Letters

K.5: May 2020 Opposition Petition Signature Forms Received