

ATTACHMENT K: Public Comments

Due to the number of public comments and length of the attachment, this attachment is available in separate PDFs.

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

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

NO IVORY HOMES RE-ZONE

June 15, 2022

Mr. Echeverria, Ladies and Gentlemen of the Planning Commission,

Please find attached a comprehensive review of the Ivory Homes proposal with regard to 675 North F Street. This proposal was assembled with input from many Avenues residents who have closely followed this application for over two years.

We have assembled our principal objections to Ivory's proposal in one, hopefully easy to read, PowerPoint style document, which takes about 30 minutes to review. We do hope you will find time to consider the views of Avenues residents expressed in this booklet.

The document covers all aspects of Ivory's application: (1) a rezone and master plan amendment; and (2) the planned development and plat plan.

We understand that at this time the Planning Commission will only be formally considering the application for a rezone and master plan amendment. This is an unfortunate, last-minute change. We believe this application would best be considered as a whole, not in parts, and thus we have not removed aspects of this document that relate to the planned development and plat plan.

In forming your decision about the rezone, we do hope you will consider all aspects of Ivory's proposal, in particular the design aspects, wherein Avenues residents consider Ivory's design to be fundamentally flawed.

A decision on the rezone cannot be considered in isolation from what Ivory intends to do with that rezone should it be granted. Also, it is the combined impact of the rezone, planned development, and site design **together** that create the problems with this development. These aspects cannot be considered in isolation in coming to a decision on the appropriateness of a rezone.

We thank you for your service to our community.

Peter Wright

Chair, The Preserve Our Avenues Zoning Coalition

THE PRESERVE OUR AVENUES ZONING COALITION
A Recognized Community Organization

Ivory Homes Application To Rezone 675 North F Street

**SUBMISSION TO THE
SALT LAKE CITY PLANNING COMMISSION**

JUNE 2022



AVENUES RESIDENTS ASK YOU TO VOTE

NO

TO A RADICAL REZONE, A SHAM PD AND APPROVAL OF A FLAWED PLAT PLAN

- Ivory uses a rezone to **shrink lots** and a planned development (PD) to **reduce setbacks** and then add large, tall, two-story, 4/5 bedroom, million-dollar houses with 3 car garages to these shrunken lots with reduced setbacks.

- Ivory asks for a rezone and then **overbuilds** compared with everything in the upper Avenues.

- Ivory fails to provide any valid justification for a PD and uses this to shrink setbacks to obtain more lots than would be possible under compliance with the new zone.

- The promise of 14 ADUs is a false promise - as a developer Ivory cannot create a single ADU - the city will likely not get the ADUs Ivory promises.

- Appallingly bad design scars the hillside with 1,625 linear feet of retaining walls as high as 13 feet.

IVORY'S PROPOSAL IS EXCESSIVE AND CREATES A DENSE, HIGH BULK, HIGH IMPACT, POORLY DESIGNED DEVELOPMENT NOT COMPATIBLE WITH THIS FOOTHILLS LOCATION.

CONTENTS

4	LEGAL
5	COMMUNITY OPPOSITION
6-13	WHY THIS PLOT WAS ZONED FR-3 AND WHY IT SHOULD REMAIN SO
14-17	IVORY'S APPLICATION FOR A PLANNED DEVELOPMENT
18-22	APPROVAL OF THE PLAT PLAN - BAD DESIGN SHOULD NOT BE APPROVED
23-29	ENVIRONMENTAL AND SAFETY
30-32	AFFORDABILITY AND ADUs
33-34	OUR PROPOSED SOLUTION AND CONCLUSIONS

LEGAL

- All of the relevant city ordinances require new development to be of similar scale, bulk and intensity to the existing neighborhood to preserve neighborhood character.
- The purpose statement for the SR-1/SR-1A zone states that, *“Uses are intended to be compatible with the existing scale and intensity of the neighborhood”*.
- Ivory requests a rezone from FR-3 to SR-1 but builds houses of a size and character far more typical of those in the adjacent FR-3 zone.
- At least 14 of Ivory’s proposed 19 houses are large two-story buildings. Most houses in the SR-1A zone of the upper Avenues are small single-story homes.
- Only 26%* of homes in the SR-1A zone of the Avenues are two-story buildings, less in the upper Avenues and there are **NO** blocks where all of the houses are two-story buildings. (See page 13).
- Where larger two-story homes exist, these are on larger lots and interspersed with smaller single-story homes.
- At least 14 of Ivory’s proposed 19 homes have three car garages. We know of **NO** homes in the SR-1A zone of the Avenues with three car garages. Only 15%* of homes in the SR-1A zone of the Avenues have an attached garage.
- Ivory’s cramming of 14 to 19 large, tall, two-story homes with 4 or 5 bedrooms and three car garages, onto small lots with reduced setbacks, all in a single block, drastically increases the scale, bulk and intensity of the development, such that it is not remotely similar in character to that of the SR-1A zone of the Avenues
- City owned land, a part of the right of way for the streets, adds significantly to front setbacks throughout the Avenues. Ivory’s development lacks this city owned land, still further increasing the comparative density and lack of greenspace in Ivory’s proposed development.
- A planned development does not negate the obligation to comply with the requirements of the underlying zone.

Compatibility is subjective and the Avenues SR-1A zone eclectic. Nonetheless, the magnitude of difference between the development proposed by Ivory and that which predominates in the current SR-1A zone is so significant, that **IVORY DOES NOT COMPLY WITH THE LEGAL REQUIREMENTS STATED IN THE SR-1/SR-1A ORDINANCE AND THIS APPLICATION MUST BE DENIED.**

**Data from a 2006 study by the Greater Avenues Community Council.*

AVENUES COMMUNITY OPPOSITION

- A well-informed Avenues community is strongly opposed to this rezone.
- 2,100 upper Avenues residents have signed a petition opposing the rezone.
- The GACC has held two votes on the rezone:
 1. 688 against 4 in favor
 2. 1,244 against 25 in favor (98% opposed)
- Three successive GACC chairs have written in opposition.
- The presidents of Northpoint, the Meridien and the Capitol Park HOAs, representing the 250 people who live closest to this property, have all written in opposition.
- Every resident of F Street adjacent to Ivory's property is strongly opposed.
- Over three hundred Avenues residents have written to the Planning Division in opposition.
- The School Board Representative for District 3 has written in opposition on child safety concerns and school numbers.
- Utah Physicians for a Healthy Environment has written in opposition on environmental concerns.
- Emotion in the Avenues runs very high on this issue with a number of residents of adjacent houses having sold their homes to avoid *“the mess Ivory wishes to produce here”*.

IVORY SEEKS TO EXPLOIT THREE ORDINANCES IN COMBINATION TO INCREASE DENSITY

1

A **REZONE** from FR-3 (12,000 sf) to SR-1 (5,000 sf) to go from a max of 11 to 19 lots

2

An **UNPRECEDENTED** use of the ADU ordinance to add ADUs to 14 of these newly created lots

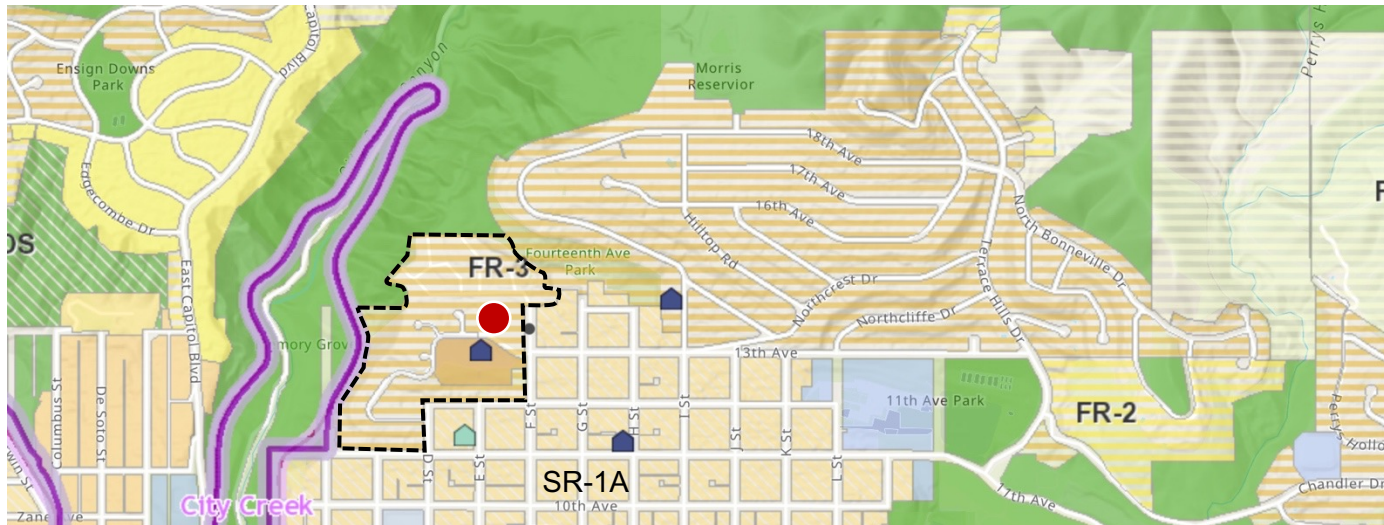
3

MISUSE of the planned development ordinance to shrink setbacks to squeeze in more lots than achievable under compliance with the SR-1 zone

This compounding results in a development with 19 primary dwellings, and 14 ADUs for a total of 33 dwellings an approximately **200% increase** in lots and a **300% increase** in the number of households.

It is not the addition of ADUs that we object to, but the combined impact of a radical rezone and a planned development used to shrink setbacks, together with the addition of ADUs.

ZONING MAP 675 NORTH F STREET



- Above is the relevant section of the SLC zoning map for the upper Avenues. The FR-3 zone (12,000 sf lots) is shown striped and the SR-1A zone (5000 sf lots) is shown in yellow.
- The location of Ivory's property is shown with a red dot. Ivory is requesting a rezone from FR-3 to SR-1 - a zone that no longer exists in the Avenues.
- Ivory's property is the last undeveloped parcel in the redevelopment of the former Primary Children's Hospital and the VA Hospital complex. This area, which includes both Northpoint and Capitol Park, shown with dotted black lines, is zoned FR-3.
- The only exception to FR-3 zoning in this parcel is the Meridien, the old VA hospital, which is zoned RMF-35.
- The neighboring block to the east although zoned SR-1A, is FR-3 in all but name. Complying with FR-3 character and density, it has only 10 lots on a parcel the same size as Ivory's.

IVORY'S PROPERTY IS SURROUNDED ON ALL FOUR SIDES BY FR-3 OR FR-3 EQUIVALENT SECTIONS, WITH THE ONLY ANOMALY BEING THE MERIDIEN - THERE IS NO LOGIC IN CARVING OUT IVORY'S PROPERTY FROM THIS FR-3 ZONE.

THE VETERANS ADMINISTRATION (VA) HOSPITAL - NOW THE MERIDIEN

- Directly to the south of Ivory's parcel is the Meridien, a 2006 condominium conversion of the old VA hospital zoned RMF-35.
- Ivory points to the existence of this building as justification for their development - there is no equivalency.
- This five-story beautiful neo-classical building, listed on the national register of historic places, was constructed in 1930 and pre-dates the development of the upper Avenues.
- By the early 1990's when this section of the Avenues was redeveloped the VA hospital had become vacant and was becoming derelict. It had either to be rezoned and repurposed or demolished.
- When repurposed to condominiums the developer, at the city's insistence, worked hard to ensure the development blended in with the single-family neighborhood. Parking was moved underground and extensive landscaping was added to buffer the bulk of this larger building.
- Density was restricted by the city, via a development agreement to half that of Ivory. Actual density is considerably less than approved.
- As a five-story building the Meridien gets its density in a different way, with less impact on the ground, allowing for large setbacks and extensive landscaping.
- In contrast to Ivory's development this conversion to condominiums was widely welcomed by the neighboring community.

THE DEVELOPERS OF THE MERIDIEN WORKED HARD TO BLEND WITH THE EXISTING
NEIGHBORHOOD - IVORY DOES NOT

IVORY'S HOUSES ARE NOT COTTAGES

- The city defines a cottage as a "small single-family home". The Form Based zone imposes a maximum footprint of 850 square feet for a "cottage".
- Ivory provides the following data for the Multi-Gen houses that make up 11 of the 14 units with ADUs:

Primary Residence Living Space (4 bedrooms)	3,353 square feet, plus a two-car garage
ADU Living Space (1 bedroom)	540 square feet, plus a one-car garage
Total Square Footage including garages	4,626 square feet

- This square footage is comparable to many of the homes in Capitol Park zoned FR-3.
- Homes in the SR-1A, block section, of the Avenues vary greatly, with no standard design, style or size.
- While there is a very wide range, realtors tell us that a **2,000** square feet home would be considered a larger than average home in the SR-1A zone of the Avenues.

NO REZONE IS REQUIRED - FR-3 IS THE MOST APPROPRIATE ZONING FOR
THE HOUSING IVORY WISHES TO BUILD.

WHY THIS LOCATION WAS ZONED FR-3/12,000 FOOTHILLS RESIDENTIAL AND WHY IT SHOULD REMAIN SO

Purpose Statement: The purpose of the FR-3/12,000 Foothills Residential District is to promote environmentally sensitive and visually compatible development..., suitable for foothills locations... 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 protect wildlife habitat... The FR-3/12,000 Foothills Residential District is intended for application in most areas of foothills development....

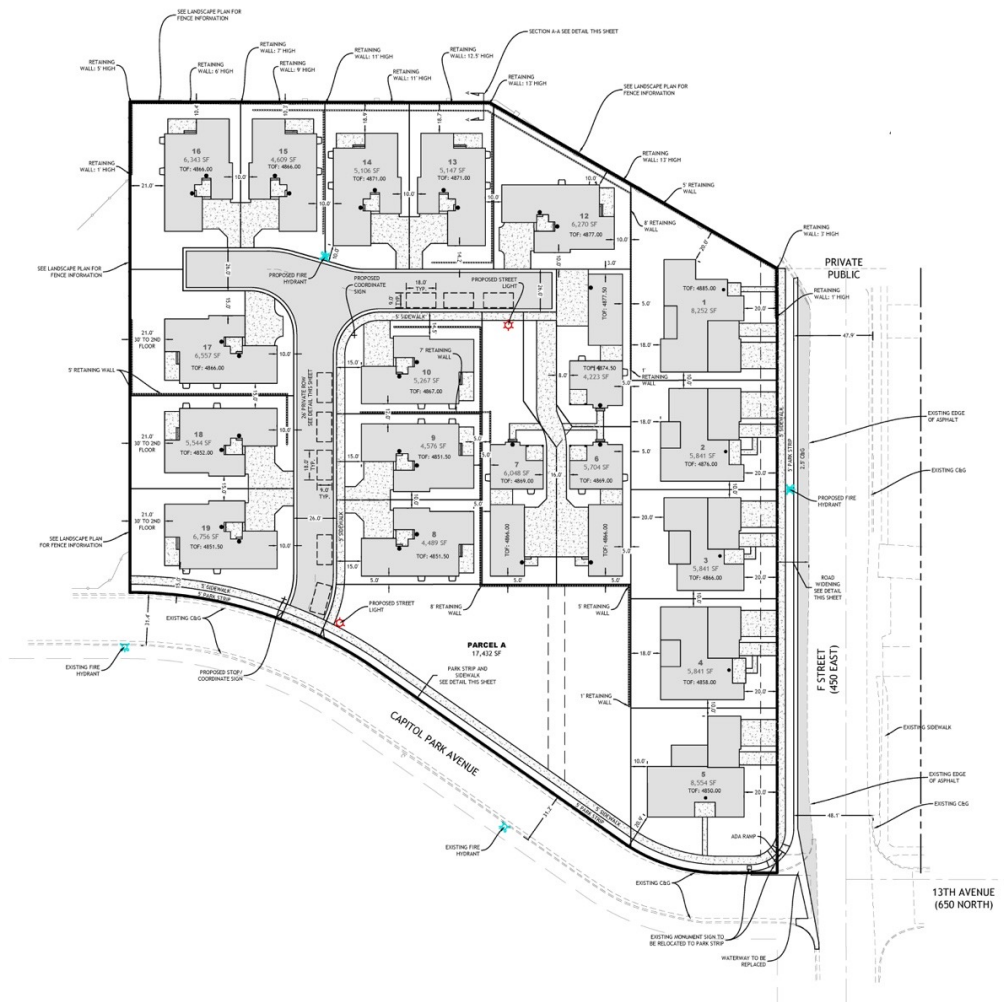
THIS AREA WAS ZONED FR-3 FOR THE FOLLOWING REASONS:

- Proximity to open land and wildlife - 150 yards from City Creek Canyon - a wildlife buffer zone.
- Topography -- concerns with water run-off and erosion and difficulty of building on highly sloped parcels.
- Traffic -- every development in the upper Avenues impacts all of the lower Avenues.
- Narrow steep streets with few amenities.

These factors are even more relevant today. Dramatic climate change has increased environmental concerns regarding wildfire, floods, erosion and air quality. Wildlife habitat is at even greater risk as dense development encroaches into the foothills.

EVEN AMID A HOUSING SHORTAGE WE MUST PROTECT WILDLIFE AND OUR FRAGILE FOOTHILLS ENVIRONMENT.

IVORY PLAT DRAWING



- Ivory uses a rezoning to double the number of lots - from a max of 11 to 19.
- Ivory uses a planned development to further reduce lot sizes and reduce setbacks.
- Ivory then puts large, tall, 4/5 bedroom houses with 3 car garages onto these shrunk lots with reduced setbacks.
- Ivory overbuilds this foothills lot with so much hardscape a large drainage basin is needed.
- Ivory's flawed design obliterates the natural terrain, requiring 1,625 linear feet of retaining walls, some as high as 13 feet, that scar the hillside.

THE RESULT IS A POORLY DESIGNED HIGH DENSITY, HIGH BULK DEVELOPMENT
THAT IS NOTHING LIKE THE UPPER AVENUES

DENSITY AND BULK

All the city ordinances require infill development to be of similar density and bulk to preserve neighborhood character.

DENSITY

Ivory's density is significantly higher than all of the adjacent properties.

NUMBER OF DWELLINGS PER ACRE

FR-3	Ivory	Capital Park	Northpoint	Adj. block on F Street	Meridien
3.63	10.31	3.63	3.60	3.47	5.73

Notes: 1) Calculations for Ivory and the Meridien include roads, so as to give a “like for like” comparison. 2) Meridien actual density 5.73, approved density 7.55.

BULK

- Key components of bulk are building size, building height, lot sizes and setbacks - all four components add to bulk in Ivory's design.
- Ivory call their houses with ADUs “cottages”. These 69 feet x 42 feet x 27 feet high buildings with 4/5 bedrooms and 3 car garages are not cottages but large, tall houses, far more typical of those found in the adjacent FR-3 zoned Capitol Park than those in the SR-1A zone.
- Close packing of fourteen of these large, tall buildings on small lots with reduced setbacks gives Ivory's development an oppressive high bulk look not found in the upper Avenues.

CITY OWNED LAND

- Homes in the upper Avenues commonly have 20 ft of front setbacks plus around 20 to 30 ft of city land between the lot line and the road giving an approx. 40 to 50 ft setback from the road. This city owned land helps give the Avenues an open, green, leafy look, despite having relatively small 5000 sf lots sizes.
- Ivory's lots lack this city land so that the impact of reducing lot sizes and setbacks is further magnified leading to a dense, crowded, urban look not typical of the Avenues.

IVORY'S PROPOSED DEVELOPMENT IS OF FAR GREATER DENSITY AND BULK THAN THE SURROUNDING NEIGHBORHOOD INCLUDING HOMES IN THE SR-1A ZONE.

PRIMARY BUILDING HEIGHTS IN THE AVENUES



- This color-coded map is taken from a 2006 GACC study. We have added the location of Ivory's property in red.
- As can be seen from this map nearly all of the houses in the SR-1A section of the upper Avenues are single-story homes shown in green.
- In the 8 blocks closest to Ivory's property only 16% of the homes are two-story and there are no blocks with more than a few two-story buildings.
- Ivory's development where **ALL** of the houses are large, tall, two-story buildings, is more typical of the FR-3 zone with 12,000 sf lots not the SR-1A zone with 5,000 sf lots.
- In 2006 the city changed SR-1 zoning (28 ft height) to SR-1A (23 ft height) to restrict the height of large houses on small lots - exactly what Ivory proposes - there can be no justification for SR-1 zoning.

IVORY ASKS FOR A RADICAL REZONE AND THEN OVERBUILD IN RELATION TO EVERYTHING IN THE NEW ZONE

IVORY'S APPLICATION FOR A PLANNED DEVELOPMENT IS A SHAM

- Ivory misuses the application for a planned development to legitimize a long list of non-compliances with SR-1 zone requirements.
- Ivory's central claim that they designed with reduced setbacks “clustering” in order to preserve open space is a fiction and this is clearly evident from a review of the record.
- Ivory’s basic design with five custom homes on F Street and 14 or 15 homes with ADU’s in the interior, precedes the application for a planned development by almost a year and has its origin in an application for FB-UN1 zoning that would have permitted this dense clustering.
- **In Ivory’s January 2021 application Ivory presented the same basic design as today while applying for FB-UN1 zoning.**
- **When the planning division would not support FB-UN1 zoning, in March 2021, Ivory modified the application to request SR-1 zoning with no change to the concept plan and without a request for a planned development.**
- **It was only later, in November 2021, when the planning division would not accept an application with a concept plan that did not meet SR-1 zone requirements that we see the application expanded to include a planned development.**
- Rather than redesign to conform to SR-1 zone requirements, which would have resulted in fewer lots, Ivory took the “quick fix” option of applying for a planned development.
- Ivory’s justification is simply a contrived exercise in “what box can we tick ” to gain a PD.

**THE APPLICATION FOR A PLANNED DEVELOPMENT IS A SHAM AND
SHOULD BE DENIED.**

IVORY FAILS TO COMPLY WITH SR-1 ZONE REQUIREMENTS AND ASKS FOR A PLANNED DEVELOPMENT TO LEGITIMIZE THE VARIANCES

NOT A SINGLE LOT MEETS THE SR-1 ZONE REQUIREMENTS

- 4 of 19 lots do not meet minimum lot size
- 6 of 19 lots exceed the 40% building coverage requirement
- 13 of 19 lots do not meet minimum side yard setbacks
- 3 of 19 lots do not meet lot width minimum
- 13 of 19 lots do not meet minimum front yard setbacks
- 19 of 19 lots do not meet rear yard setbacks

- **Retaining Walls.** Ivory's plan fails to comply with city code on the design of retaining walls.
- **Inadequate front setbacks.** Front setbacks of only 10 ft between paving and building mean large two-story dwellings will loom over roadways and sidewalks
- **Inadequate side yard setbacks.** Side yard setbacks of only 10 ft between buildings will impact privacy and side windows will look directly into retaining walls only feet away.
- **Inadequate rear yard setbacks.** Reduced setbacks on the boundary with Northpoint risk undermining Northpoints' current boundary wall.

IVORY MISUSES THE PLANNED DEVELOPMENT ORDINANCE IN ORDER TO REDUCE SETBACKS AND SQUEEZE IN MORE LOTS THAN ACHIEVABLE UNDER SR-1 ZONE REGULATIONS.

IVORY DOES NOT MEET THE CRITERIA FOR A PLANNED DEVELOPMENT AS DEFINED IN THE PURPOSE STATEMENT 21A.55.010

- Ivory misuses the planned development ordinance to reduce setbacks throughout the development, including the periphery, in order to fit in more lots than would be possible under strict compliance with the new zone.
- The planned development ordinance allows relaxation of zoning requirements if the development “...implements the purpose statement of the zoning district in which the project is located...”
- Ivory's development does not meet the requirements of the Purpose Statement for the SR-1 zone 21A.24.080 which states that “uses are intended to be compatible with the existing scale of the neighborhood” and that they “...promote sustainable and compatible development patterns and to preserve the existing character of the neighborhood.”
- The planned development ordinance also requires that a project “...provides a more enhanced product than would be achievable through strict application of land use regulations, while enabling the development to be compatible with adjacent and nearby land development...”
- Ivory's project does not meet either of these requirements, there is no enhanced product, any benefits of squeezing in additional lots is negated by the increase in density, bulk and building lot coverage creating a development that is clearly not compatible with the existing neighborhood.
- The addition of ADUs, built as original construction, does not constitute an enhanced product as these can be had without a planned development.

IVORY DOES NOT MEET THE CRITERIA FOR A PLANNED DEVELOPMENT AND
THE APPLICATION SHOULD BE DENIED

THE PLANNED DEVELOPMENT ORDINANCE REQUIRES THAT A PROJECT MEET ONE OR MORE OF SIX SPECIFIC OBJECTIVES

Ivory claims that they meet 21A.55.010 A6 and 21A.55.010.C2 - they meet neither.

21A.55.010.A6

(A) Open Space and Natural Lands: Preserving, protecting or creating open space and natural lands. Subsection 6 Clustering of development to preserve open spaces.

- Ivory claims that Parcel A is a "Private Park" and that setbacks are reduced throughout the development "clustering" in order to add shared space, this is totally contrived. Parcel A is a drainage basin. Ivory uses a rezone to shrink lot sizes and a PD to reduce setbacks and overbuilds on this sloped foothills lot causing a drainage problem. Ivory then disingenuously calls this drainage basin a "Private Park" and seeks to use it to justify the increase in hardscape that caused the drainage problem in the first place.
- Whereas "clustering" might be acceptable in the center of a large 30-acre parcel where the cluster is not visible to neighboring developments, it is not acceptable on this small 3-acre parcel, where the clusters are clearly visible to all as a dense collection of large two-story, high bulk houses.

21A.55.010.C2

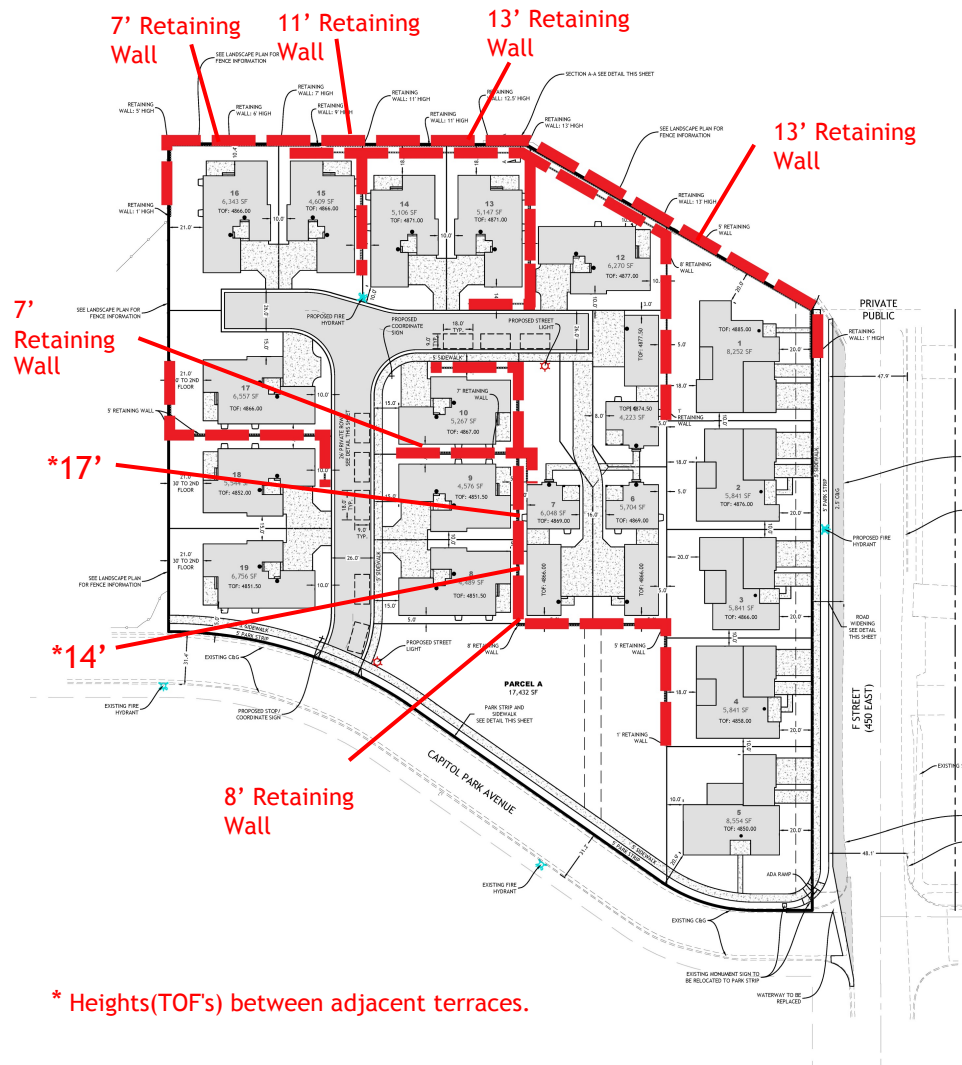
(C) Housing: Providing affordable housing or types of housing that helps achieve the City's housing goals and policies: Subsection 2 The proposal includes housing types that are not commonly found in the existing neighborhood but are of a scale that is typical to the neighborhood.

- While Ivory meets the requirements of the first part, in that a subdivision of ADUs is not commonly found in this location, or anywhere in the city, they do not meet the second criterion that the scale be typical to the neighborhood. Ivory therefore do not comply with the requirements of C2.

**IVORY DOES NOT MEET THE CRITERIA FOR A PLANNED DEVELOPMENT AND
THE APPLICATION SHOULD BE DENIED**

BAD DESIGN SHOULD NOT BE APPROVED

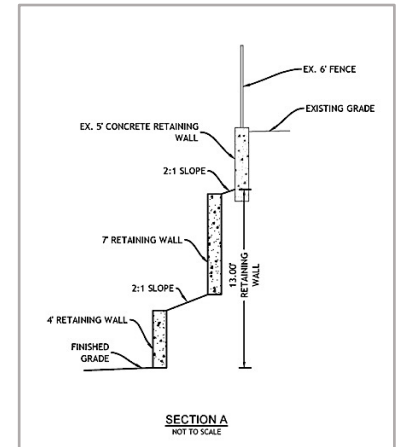
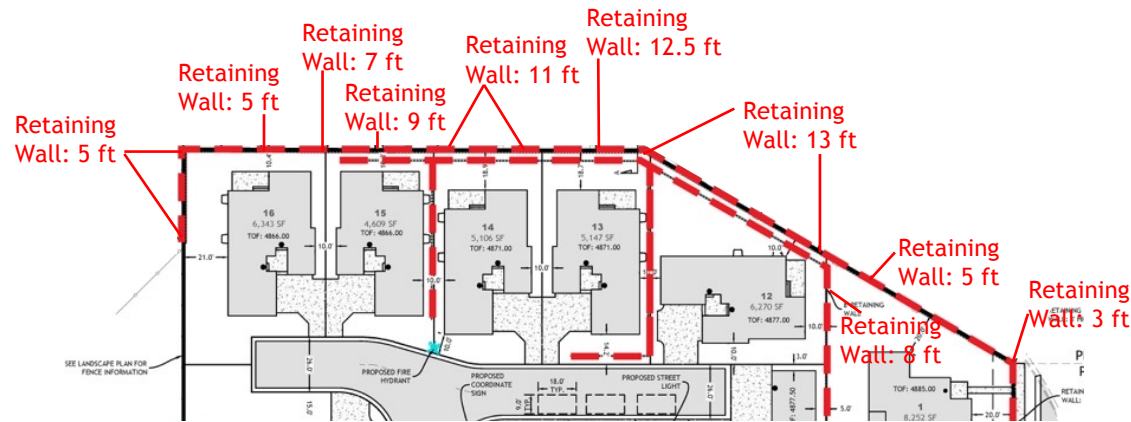
RETAINING WALLS



- Ivory's retaining walls are highlighted in red.
- The plot slopes 50 feet diagonally southwest to northeast.
- Throughout the Avenues individual lots follow the contour of the hillside with sufficient space to accommodate grade changes. Where retaining walls are required these are generally small.
- The five homes on F Street follow this pattern with individual lots stepping up the hillside.
- For the remaining 14 units Ivory has adopted a design with paired houses and conjoined driveways, mirrored on either side of the road. This necessitates a terraced design with multi-lot terraces being supported by a network of large retaining walls.
- These unsightly retaining walls consume side and rear yard setbacks leading to minimal green space.
- 1,625 linear feet of retaining walls, as high as 13 feet or more, scar the hillside.
- These tall retaining walls endanger both wildlife and children.

THIS PROLIFERATION OF RETAINING WALLS SCAR THE HILLSIDE AND WILL BE THE DOMINANT VISUAL FEATURE OF THE DEVELOPMENT

BAD DESIGN SHOULD NOT BE APPROVED THE NORTHERN BOUNDARY

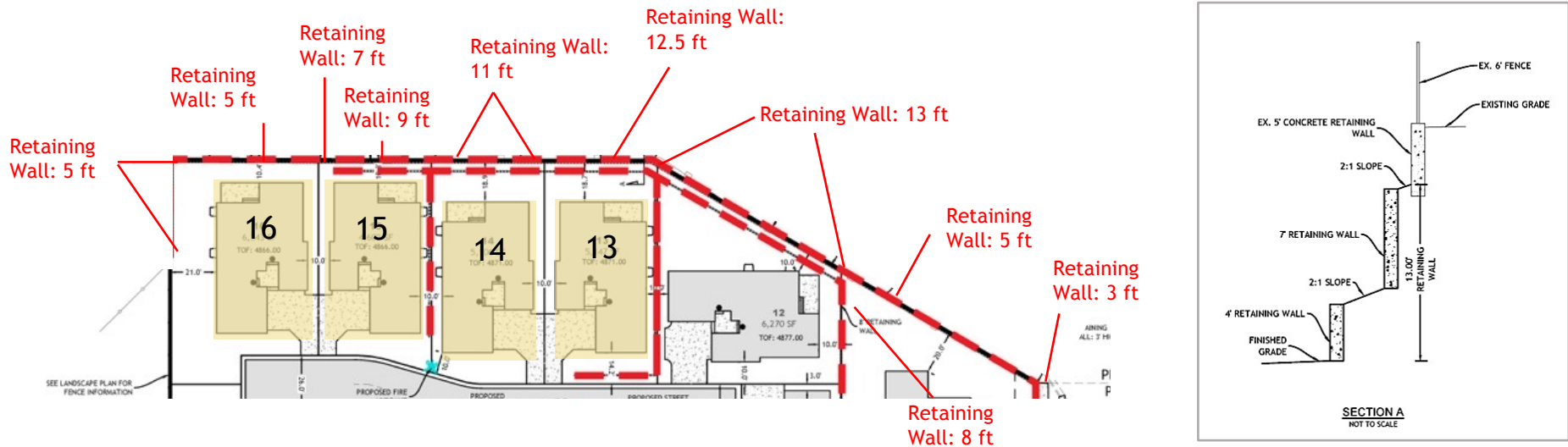


- The northern boundary with Northpoint runs for 415 feet.
- The three illustrations above show how this boundary looks today with a short retaining wall and fence combination and how it will look under Ivory's scheme.
- Ivory's flawed design and grading scheme hollows out the land and places a tall retaining wall along the entire northern boundary **in front of and below** Northpoint's existing boundary wall/fence combo.
- The combined height of these new and existing walls is as high as 24 feet.
- Ivory's wall design with a 7 feet step violates the Salt Lake City grading ordinance which requires a maximum wall height of 4 feet with a 3 feet separation between terraces for multiple walls.
- Setbacks are reduced from a required 25 feet to 10 to 15 feet - jeopardizing the integrity of Northpoint's current boundary wall.
- This massive retaining structure creates an unsightly backdrop to the entire development - anyone looking from Capital Park Avenue will see nothing but buildings and solid walls.

**THIS APPALLINGLY BAD DESIGN IS COMPLETELY UNNECESSARY.
IVORY HAS NOT DESIGNED TO FIT THE CONTOUR OF THE LAND.**

PLAT PLAN - BAD DESIGN SHOULD NOT BE APPROVED

REDUCED SETBACKS COMPROMISE NORTHPOINT'S BOUNDARY WALL



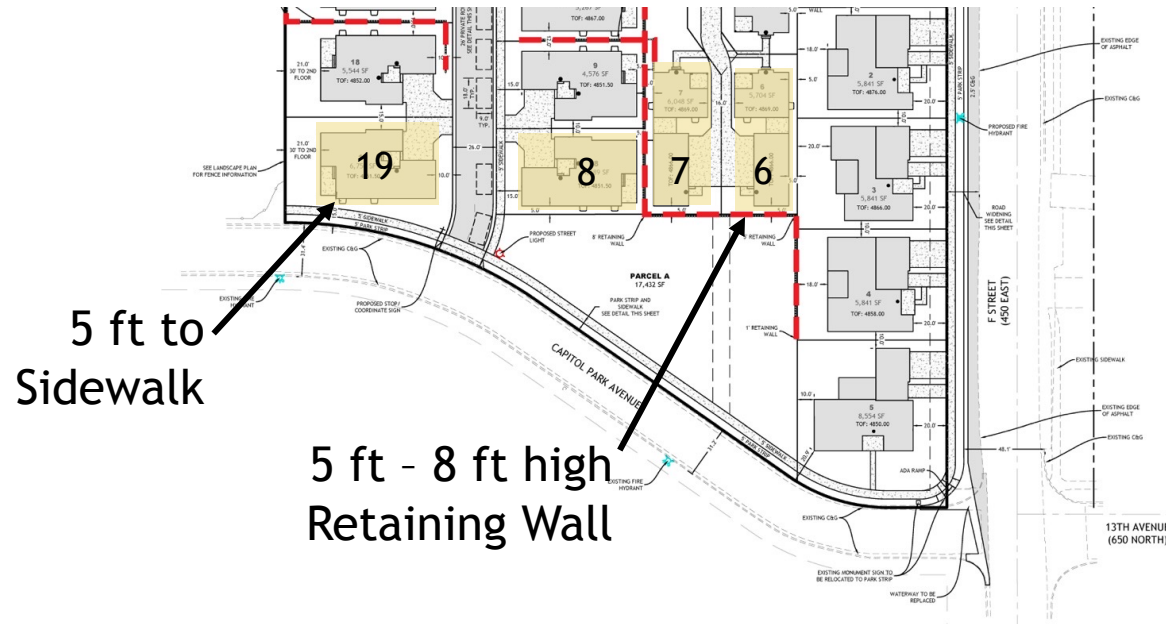
SETBACKS

	<u>Setback</u>	<u>Ivory</u>	<u>Required</u>	
Unit 13	Rear Yard	15 ft	25 ft	25% of lot depth
Unit 14	Rear Yard	15 ft	25 ft	25% of lot depth
Unit 15	Rear Yard	10 ft	22.5 ft	25% of lot depth
Unit 16	Rear Yard	10 ft	25 ft	25% of lot depth

- These reduced setbacks intrude on Northpoint's privacy.
- Excavation for such a massive retaining wall so close to Northpoint's current boundary wall risks undermining and damaging this structure.
- Northpoint's current boundary wall also helps support Northpoint Drive, the only ingress and egress for the fifty Northpoint residences.
- The President of the Northpoint HOA has written to the planning division strenuously objecting to this encroachment
- Ivory's retaining wall design throughout the development does not meet city design standards for retaining walls.

APPROVAL OF THIS PLAT PLAN SHOULD BE DENIED - REAR YARD SETBACKS MUST BE MAINTAINED AND RETAINING WALLS CONSTRUCTED TO CITY STANDARDS

BAD DESIGN SHOULD NOT BE APPROVED UNITS BORDERING CAPITOL PARK AVENUE



UNITS 8 & 19

- Throughout the Avenues the front elevations of buildings face the street.
- Ivory ignores this design principle and orientates large 69 feet side elevations to face the street.
- Unit 19 sits a mere 15 feet from the road, 5 feet from the sidewalk towering over the street and pedestrians.
- By comparison, the closest part of the Meridien opposite has a 70 feet setback to the road, 65 feet to the sidewalk. Its width at 54 feet is also less than Ivory's 69 feet.

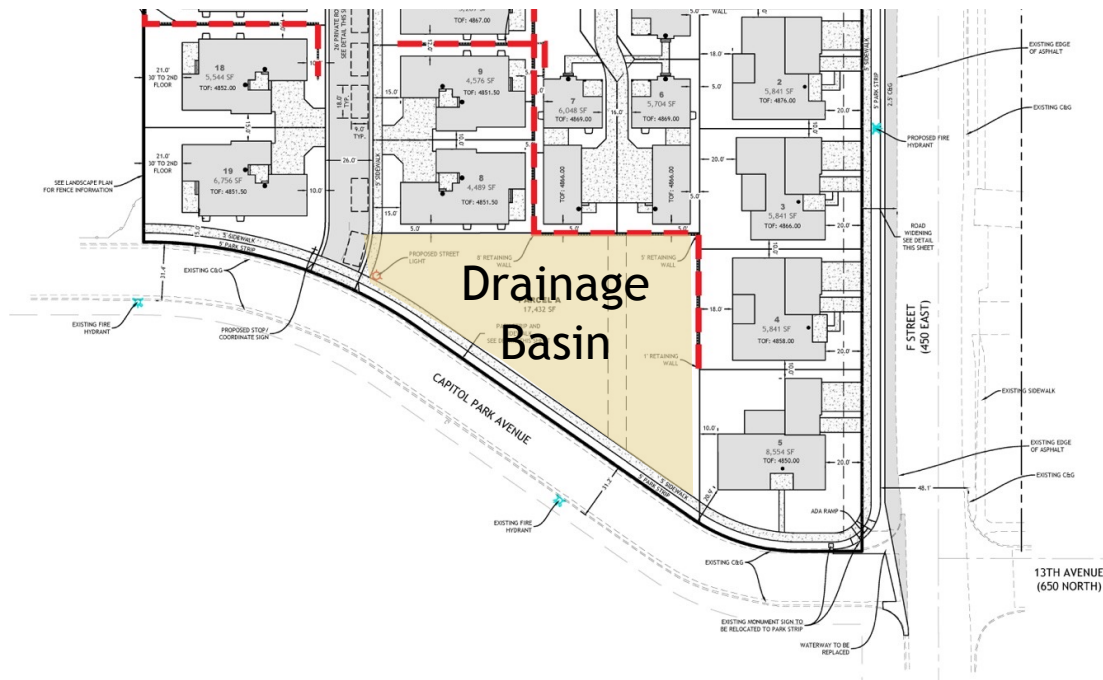
UNITS 6 & 7

- Units 6 & 7 have 27 feet high rear elevations facing the street **perched on top** of a 5 to 8 feet high retaining wall.
- This retaining wall adds to the bulk, height, and scale of these already tall units.

IVORY HAS NOT DESIGNED TO FIT EITHER THE CONTOURS OF THE LAND
OR TO BLEND WITH NEIGHBORING DEVELOPMENT

BAD DESIGN SHOULD NOT BE APPROVED

DRAINAGE BASIN ON CAPITOL PARK AVENUE



- Ivory adds so much hardscape to this sloped lot that a large unsightly drainage basin is required and placed alongside Capital Park Avenue.
- Ivory's development has 54% hard surface coverage, approximately 2X a typical FR-3 development would have on this property.
- Ivory's plot at 3.2 acres is the same size as all the Avenues blocks - you don't see such drainage basins anywhere else.
- Ivory disingenuously calls this drainage basin a "private park" and in the planned development application uses this to justify the reduction in setbacks and increased hardscape that caused the drainage problem in the first place.

FR-3/12,000 FOOTHILLS RESIDENTIAL ZONING SPECIFICALLY SEEKS TO LIMIT DEVELOPMENT TO 12,000 sf LOTS IN ORDER TO PREVENT OVER BUILDING WITH EXCESSIVE HARDSCAPE LEADING TO WATER RUN-OFF ISSUES

ENVIRONMENTAL CARS AND AIR POLLUTION

- The city's five-year housing plan, all the newer ordinances and the Mayor's State of the City Address all call for density to be added to "walkable" sections of the city close to mass transit, jobs, shops and other amenities to reduce automobile usage - this is not such a location.
- Steep narrow streets without a continuous network of sidewalks make walking difficult in summer and hazardous in winter.
- The nearest store is Smiths, seven blocks down a steep grade.
- Public transport is minimal necessitating almost all trips be by private vehicle with all the attendant pollution problems. *(The information in Ivory's submission in relation to public transport is incorrect. The No.11 bus no longer comes to 13th Ave and a change is required to travel to the city. Please see rideuta.com for correct information.)*
- With 33 dwellings and two cars per dwelling, this development will add around 70 cars, adding to already crowded Avenues streets and worsening air quality.
- Ivory's overly dense design will also require extensive shuttling of cars leading to a high level of particularly noxious start-up pollution.

THIS UPPER AVENUES LOCATION LACKS THE INFRASTRUCTURE REQUIRED
TO ACCOMMODATE DENSITY

ENVIRONMENTAL WILDLIFE AND TREES

Wildlife

- This plot sits 150 yards from City Creek Canyon in a wildlife interface zone where wildlife such as mule deer are ever present. FR-3 zoning recognizes this and limits development in order to protect wildlife.
- Mankind and wildlife can coexist in these boundary areas given a little space but mule deer don't do well in developments with 10 feet between buildings and excessive hard surface coverage.
- Ivory's flawed design with large, tall retaining walls creates a danger to wildlife.

Trees

- This lot contains upwards of 20 mature trees, several of which would meet the definition of specimen trees as defined in the Salt Lake City private tree ordinance.
- These trees have long been the nesting site for red-tailed hawks. A family of these hawks is currently nesting in a large ponderosa pine on the lot.
- Ivory's overly dense design with reduced setbacks and severe grading scheme means all of these trees will be cut. Under FR-3 zoning a number of these beautiful mature trees could be retained and integrated into the development as they were when Northpoint and Capitol Park were developed.

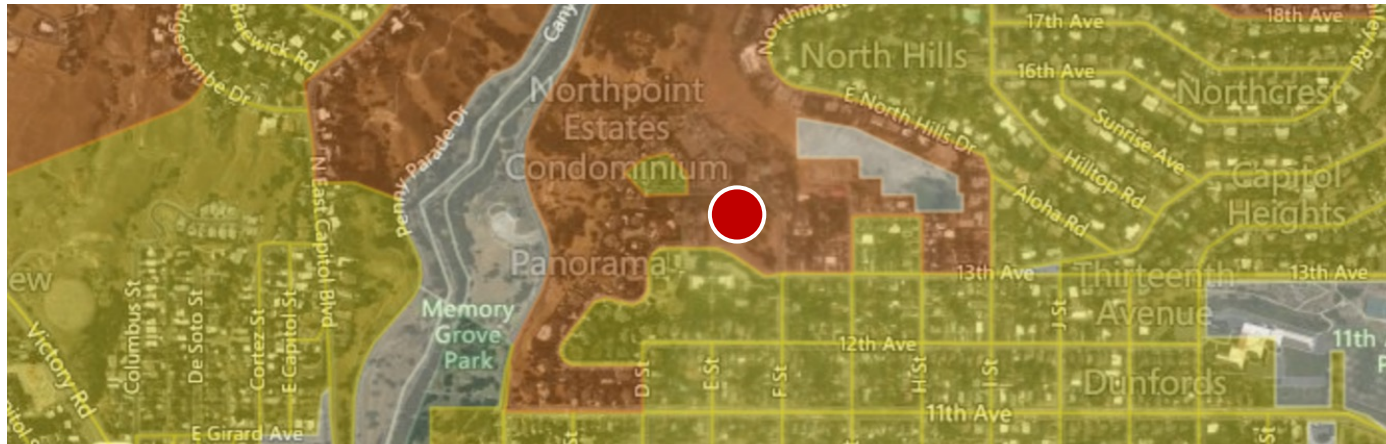
WHAT VALUE DOES THE CITY PLACE ON MATURE TREES?



- There are over twenty mature trees on this property, believed to be close to 100 years old, each adding to the joy of daily life while helping improve air quality and preserve our planet.
- The cluster of beautiful Ponderosa Pines, shown in the photograph opposite, sit in the southeast corner of the lot and have been the birthplace and home to generations of Red-Tailed Hawks.
- The city's "Private Tree Preservation Ordinance", 21A.48.135 empowers the city to preserve such "specimen trees" if it chooses to do so.
- We applaud the work of the Urban Forestry Division in planting new trees, but we must also act to preserve mature trees that have a far greater near-term impact on air quality and climate change.

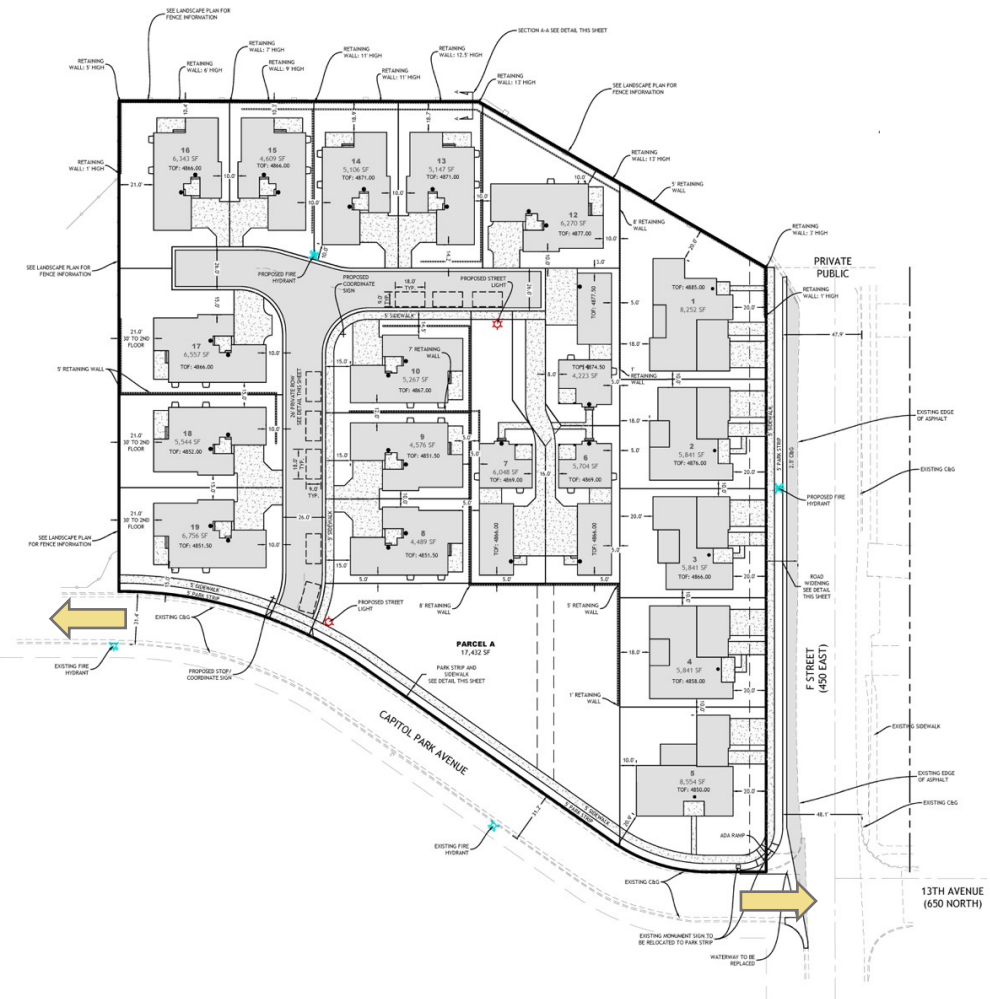
WE ASK THAT AT A MINIMUM THE CITY ACT TO PRESERVE
THESE TWO PONDEROSA PINES

FIRE SAFETY IN WILDLAND-URBAN INTERFACE AREAS



- This map is taken from a document published by the US Forest Service in collaboration with the US Fire Administration and shows areas most at risk from wildfires. Ivory's property sits in this high-risk wildland-urban interface area as does Northpoint. The location of Ivory's property is shown with a red dot.
- The Salt Lake City Fire Department has published a guide titled *"Guide To Fire Adapted Communities"* where it specifically calls for proactive land use planning to decrease the risk from wildfires in such areas. **This would surely include not adding high density, difficult to access developments within this high-risk area.**
- Northpoint with 50 homes has experienced multiple wind driven wildfires in recent years that have required emergency evacuation from Northpoint.
- The only egress for residents leaving and emergency services entering Northpoint is via F Street adjacent to Ivory's property. There is great concern among Northpoint residents that F Street will act as a chokepoint, made more dangerous by the addition of Ivory residents and vehicles evacuating at the same time. There is further concern that this chokepoint will be narrowed by parking from Ivory guests where Ivory have provided minimal parking.
- There is also concern with regard to Ivory's hammerhead road design making maneuverability within their development difficult and that the proliferation of tall retaining walls will impede firefighter movement. There is particular concern with regard to lots 6 & 7 which are only accessible via a narrow driveway.

CAPITOL PARK AVENUE A PRIVATE ROAD



- The sole ingress and egress for the 28 Ivory households of the homes with ADUs is via Capitol Park Avenue, a private road owned by the Meridien and Capitol Park HOAs.
- When the Capitol Park subdivision was created the city did not want to pay for the construction of the roads so these were paid for and are maintained by the HOAs.
- Capitol Park Avenue was designed to handle the limited requirements of the current low-density community and approved by the city on that basis.
- Ivory has an easement to use this road passed from the seller, the Church of Jesus Christ of Latter-day Saints, who had intended to build a chapel here. This would have involved only limited Sunday traffic and would also have had an additional entrance on F Street.
- For a decade between 1995 and 2005 the HOAs petitioned the city to accept responsibility for Capitol Park Avenue - the city refused on the basis that the road is too narrow and does not meet city design standards.

IS IT EQUITABLE FOR THE CITY TO GRANT A RADICAL UPZONE, IMPACTING A PRIVATE ROAD IT DID NOT WISH TO PAY FOR -- A ROAD FOR WHICH IT HAS REFUSED TO ACCEPT RESPONSIBILITY -- AND TO DO SO AGAINST THE WISHES OF THE OWNERS OF THAT ROAD?

CHILD SAFETY AND SCHOOLS

- Katherine Kennedy Salt Lake School Board Representative for District 3 has written expressing concern with regard to child safety from the addition of so many vehicles to this location.
- Ivory's development sits next to the school bus stop for children catching the bus to West High - a popular stop. Children often catch the bus in the dark on winter mornings when they are sleepy and inattentive.
- The surrounding streets are exceptionally steep and lack a continuous network of sidewalks, often necessitating children walk in the street. The section of F Street between 13th Avenue and 11th Avenue is particularly steep and a known winter driving hazard area.
- Katherine has also stated that these homes with no yards will not attract families with young children and support declining numbers at the Ensign School.
- Realtors note an acute shortage of larger homes with yards that would attract families with young children and consider this an ideal location for such homes.
- The network of tall retaining walls also poses a danger to children as well as wildlife.

GUEST PARKING/MAILBOX STACK/SNOW STORAGE

GUEST PARKING

- Ivory provides only 8 guest parking spaces on their internal road for 28 households - this is insufficient.
- Ivory's easement to use Capitol Park Avenue grants the right of ingress and egress only and does not include parking on this private street posted as no parking.
- This will push parking to F Street creating the evacuation chokepoint that Northpoint residents fear or Ivory guests will park illegally on Capitol Park Avenue causing friction between neighbors.

MAILBOX STACK

- Ivory has provided no place for a mailbox stack internal to their development. They cannot place this on Capitol Park Avenue - a private street posted as no parking - as this would encourage illegal parking to access the mailbox stack.
- Where will Ivory place their mailbox stack?

SNOW STORAGE

- Ivory has provided no place to store snow. Parcel 'A' is not designed to accommodate this and they cannot push snow onto Capitol Park Avenue a private road.
- Ivory's internal road, 26 feet wide, is the bare minimum required to meet fire code and to allow two lanes. Pushing snow to one side with parking on the other will make this road impassable to emergency services or other large vehicles such as Fed-Ex trucks or Amazon delivery vans.
- Where will Ivory store snow?

IVORY HAS PROVIDED INSUFFICIENT SPACE INTERNAL TO THEIR DEVELOPMENT
TO MEET THE NEEDS OF THEIR COMMUNITY LEADING TO ENCROACHMENT ON
NEIGHBORING PROPERTIES

AFFORDABILITY

- The city is currently considering a new affordable housing initiative where developers may be granted zoning concessions in exchange for creating affordable housing. Ivory asks for a series of concessions from the city **far greater** than those envisaged in the new initiative but creates no affordable housing.
- Ivory has told us that the units with ADUs will sell for well in excess of one million dollars. The five custom homes on F Street, on lots created by the rezone, will likely sell in the two million dollar range. This is not affordable housing.
- Rentals on the ADUs will be in the \$1500 to \$2000/month range, again not affordable for most.
- The city affordable housing initiative also wisely limits its plan to sections of the city close to fixed mass transit and arterial roads with a frequent bus service, recognizing the need to concentrate density close to transit.
- This upper Avenues location, with few amenities and limited bus service, is distant from both fixed mass transit and arterial roads. This requires almost all trips to be by private vehicles. Such short trips are particularly harmful to air quality.
- The lack of any meaningful public transport or access to amenities within walking distance, will require two adult families to own and operate two vehicles at an annual cost of around \$20,000, further adding to the lack of affordability.

IT IS VERY EASY TO SEE WHAT IVORY GETS - THEY GET TO SELL TWICE AS MANY MILLION DOLLAR PLUS HOUSES. WHAT DOES THE CITY GET IN EXCHANGE FOR ALL THE CONCESSIONS BEING DEMANDED BY IVORY?

ADUs (1)

- Granting approval for a developer to build ADUs is complex and creates some difficult questions for the city to answer.
- Ivory's application to build a subdivision of ADUs is unprecedented -- they themselves describe it as an experiment.
- The intention of the 2018 ADU ordinance is to allow "owner occupiers" to add an ADU one at a time, not to allow developers to create a subdivision of ADUs.
- This is the way the ordinance reads and the way it was explained to the public after a highly contentious eight-year debate.

"It's one unit at a time...it's not a subdivision or an apartment complex of 200 units. [They] have little impact on actual neighborhoods and streets. They often blend in and are unnoticed"

- Jake Young Planning Manager for Salt Lake County
The Salt Lake Tribune September 1st 2019

WE ARE NOT OPPOSED TO ADUs, BUT IT SHOULD BE RECOGNIZED THAT A SUBDIVISION OF ADUs ADDS TO DENSITY IN A WAY INDIVIDUAL UNITS DO NOT.

TO APPROVE SUCH A CONTROVERSIAL PROJECT INVOLVING A RADICAL UPZONE AND A PLANNED DEVELOPMENT, IN ADDITION TO THE INCLUSION OF A SUBDIVISION OF ADUs -- AGAINST THE WISHES OF THOUSANDS OF AVENUES RESIDENTS -- RISKS BREAKING TRUST WITH THE PUBLIC FOR VERY LITTLE GAIN.

ADUs (2)

- The Planning Division and City Legal Department accept that only “owners occupiers” can create an ADU, but suggest that the city can adopt a workaround whereby Ivory can build the “physical elements” of an ADU, which might later be converted to ADU status by a subsequent purchaser.
- Ivory uses the lure of creating ADUs to justify a rezone, allowing them to build twice as many million dollar plus houses.
- Ivory promises the creation of 14 ADUs, but this is a false promise - as a developer they cannot create a single ADU.
- ADUs can only be created by an “owner occupier” - what if that “owner occupier” does not want an ADU?
- Some/many will not and Ivory knows this. Hence, they advertise the ADUs as extra space for a home office, a guest suite or space for a large family. These purchasers will not create an ADU.
- How many of the accessory units will be used as short-term Airbnb rentals, not ADUs?
- **The amount of ADUs that will be created is unknowable.**
- Attempts to control use via deed restrictions will likely be ineffective as the city lacks any meaningful enforcement capability.

CAN IT BE RIGHT FOR THE CITY TO APPROVE A RADICAL REZONE ON THE BASIS OF
GAINING A TOTALLY UNKNOWABLE QUANTITY OF ADUs ?

OUR PROPOSED SOLUTION

- Maximizing density at all costs, as Ivory asks, will not win continued public support and in the long run will damage city policy goals.
- For two years our organization has suggested a solution that should satisfy all parties.
 - Ivory's stated objective is to build a demonstration project featuring ADUs as original construction.
 - However, this does not require a rezone or a planned development.
 - Ivory can build their demonstration project under current zoning, with up to 11 primary dwellings and 11 ADUs.
 - Ivory can satisfy their stated goal. The city would gain an increased number and variety of dwellings and this foothills lot would not be overbuilt and spoiled.
- Our organization would accept this as reasonable solution and would advocate for this within the Avenues.
- If this development is built and turns out to be the disaster Avenues residents believe it will be, ADUs will get the blame, while the real culprit is the rezone cutting lots to an untenable size.

IF SALT LAKE CITY WANTS THE FIRST SUBDIVISION WITH ADUs TO BE A SUCCESS IT
WILL DENY THE REQUEST FOR A REZONE.

CONCLUSIONS

- Approval of this project would violate the City's own ordinances that require new development to be compatible with and maintain neighborhood character.
- All the reasons for this plot originally being zoned FR-3 remain valid today.
- Ivory knew full well how this plot was zoned when they purchased it.
- Ivory seeks a radical rezone to double the number of lots and a PD to shrink setbacks and then overbuild in relation to the new zone.
- Ivory's large houses - 4/5 bedrooms and 3 car garages are more representative of residences in the FR-3 zone.
- Ivory provides no valid case for a planned development.
- A flawed design and grading plan with 1,625 ft of retaining walls scars the hillside.
- Creation of a subdivision of ADUs creates several difficult questions for the city to answer - the city will likely not get the ADUs Ivory promises.
- Ivory's project enriches Ivory while doing nothing to help the city with the shortage of affordable housing.
- This upper Avenues area lacks the infrastructure to support density - it is not a "walkable" part of the city.
- Homes with no yards will not attract families with young children and support school numbers.
- If Ivory wishes to build a demonstration project featuring ADUs built as original construction, as they claim, they can do so under the current FR-3 zoning.

PLEASE VOTE NO TO ALL FACETS OF IVORY'S FLAWED
AND EXCESSIVE APPLICATION

Dear Mr. Echeverria,

I am writing on behalf of the Greater Avenues Community Council (GACC) to inform you of the results of our recent vote regarding Ivory Development's application to rezone 675 F Street from FR-3 to FB-UN1. On August 5th in our General meeting, GACC conducted a virtual vote, as well as permitted residents to vote via email, if they were not able to join us on our virtual platform. The results of the vote were 688 opposed and 4 in favor of the Ivory Development's rezone application. The primary concerns against this rezone application include:

1. The City's Five Year Housing Plan and all of the newer zoning ordinances state the need for new high density developments to be in "walkable" parts of the City, close to mass transit, jobs, shops, restaurants and other amenities in order to reduce greenhouse gas emissions and fossil fuel consumption. The proposed development is not in such a location. There are no amenities within easy walking distance and minimal public transport options. Therefore, two-adult families will be forced to operate two private vehicles, adding around 90 cars with all the resultant environmental concerns. There are no high frequency public transportation options nearby.
2. The section of F Street adjacent to this plot has a 15% grade, at the very maximum considered safe for City streets, and is a well-known winter driving hazard. It is also a bus stop for around 20 kids boarding the school bus for Bryant Middle and West High Schools. SLC Fire Captain Winkler has also stated that the surrounding streets would not accommodate an evacuation in the case of a fire.
3. Ivory's proposed sale price on the homes with ADU's is \$800,000 to \$1,200,000, depending on model. As such these are not even close to "affordable" and the rental costs on the ADU's will be correspondingly unaffordable.
4. The proposed plan has little open space and is not "walkable" as it has no sidewalks, and threatens to endanger the nearby wildlife within City Creek and the foothills. The current FR-3 zoning focuses on protecting the sensitive foothills environment by limiting development to minimize flooding and erosion and protect wildlife habitat. Ivory's proposal, by contrast, seeks to clear-cut all the mature trees and pack the lot wall-to-wall with hardscape, no yards, minimal setbacks and 10 feet between buildings.

This is not an exhaustive list, rather it highlights the main concerns driving opposition amongst Greater Avenues Residents. I would like to stress the GACC vote was against this specific re-zoning application, not against all development. Thank you for taking the time to be engaged with our community.

Sincerely,

Laura Cushman
GACC Chair



The Greater Avenues Community
Council
PO Box 1679
Salt Lake City, UT 84110
www.slc-avenues.org

Daniel Echeverria
Senior Planner
Salt Lake City Planning Division

Dear Mr. Echeverria

Thank you for the opportunity to comment on the proposed rezoning application for 675 N. F Street. The Greater Avenues Community Council is opposed to the rezoning. We had presentations from the applicant and from a group opposing the proposal at our March meeting, and per our bylaws, held a vote at the April meeting. The vote was 1244 opposed to 25 in favor.

Between our March and April meetings, the rezone proposal was changed from FB-UN1 to SR-1. We did not change our voting process for several reasons. Primarily, we took our lead from the City Planning Division, which did not restart the public comment period or otherwise change their process or timing. Also, the basic layout did not change. Although the latest zoning proposal was not officially voted on, the results from this vote and the one last year (688-4) indicate that the community supports retaining the current zoning (FR3).

We allowed vote by email due to the 500 person maximum on our Zoom account. To confirm eligibility, each voter had to provide their name and address in the email.

As expected with so many voters, many different issues were raised. However, the most common concerns raised by those opposed include:

Density: Either zone being considered would allow twice the number of units as the current zoning. The current zoning allows 11 homes to be built (with ADUs, if desired). The latest proposal would add 20 homes, plus 15 ADUs, although the zoning regulations would allow more. This density is much greater than most areas of the Upper Avenues.

Traffic: Doubling the density would also double the traffic. The effect would be concentrated because the latest design has only one entrance into the development, from Capitol Park Avenue, an already undersized private road. Concerns were also raised about large vehicle access, especially fire trucks, garbage trucks, and snow plows.

AirBnBs: There is concern the ADUs will be used as short term rentals, which would increase the traffic problems and do nothing to help the city's housing stock. Technically, this use is prohibited in SR-1, although it would be allowed in the FB-UN1 zoning. However, enforcement of this regulation is already a problem in the Avenues.

There is also considerable resistance to the idea that \$800,000 houses would contribute to solving Salt Lake City's affordable housing problems.



Per the Salt Lake City Zoning webpage: "The purpose of the Foothills Residential district is to promote environmentally sensitive and visually compatible development, suitable for foothills locations as indicated in the applicable community master plan." The FR-3 zoning is already the smallest lot size of the Foothills Residential zones. The residents of the Greater Avenues Community Council support retaining the existing zoning.

David H. Alderman

David H. Alderman
Chair, Greater Avenues Community Council

January 7, 2022

Daniel Echeverria
Senior Planner
Salt Lake City Planning Division

Dear Mr. Echeverria

Thank you for the opportunity to once again comment on the proposed Ivory Homes Capitol Park Cottages rezoning application for 675 N. F Street. We have reviewed this request three times and submitted comments. I believe you have our previous letters already in the file. Those letters detail votes taken, which show overwhelming opposition to this request.

Our January 2022 Newsletter had three articles about the project. We had one from you outlining the request and providing details about the City process. Peter Gamvroulas wrote an article explaining the new proposal and a site map. The Preserver Our Avenues Zoning Coalition contributed an article outlining their reasons for opposing the project.

Attendance at our January 5 virtual Community Meeting was over 120. The presentations about this request were productive. You provided an excellent overview of the project and process. We also had a short presentation from Peter Gamvroulas. Peter Wright, representing the Coalition, presented their point of view. After the presentations, we had a managed chat with one of our board members presenting consolidated questions. This format was efficient and civilized. Members of the community ask questions regarding the following topics:

- Why is a rezone necessary to develop this property?
- Clarification of the number of homes
- How does this development enhance the character and identity of the Avenues?
- Zoning requirements for ADUs
- Difference between an owner applied ADU as opposed to a builder
- Review by the Fire Department
- Rational for private streets
- City services for private streets
- Height of retaining walls and grading
- Does the height of the retaining walls require an exception?
- The price point for homes
- Use of homes for Airbnbs
- Proposed changes to the future land use plan
- Will Ivory produce CC&Rs for this development, and will they be available?
- What will Ivory do if this request is not approved?
- How many applications can a developer make?

The group did not vote on this project. Our rules require a one-month delay, and the group was confident the results would be the same as the other two votes.



We have a positive suggestion. The Greater Avenues Community Council recommends Ivory Homes follow the Avenues Master Plan and zoning rules that were in place when they purchased it. There is support for a development on this property under the current FR-3 zoning. The purpose of the zone is to promote environmentally sensitive and visually compatible development. This zoning is appropriate for this foothill site and this neighborhood. Many of us with the council worked to establish the Avenues Master Plan, and we appreciate how much careful consideration when it to it. We would hate to see all that careful consideration pushed aside. We look forward to reviewing plans from Ivory Homes that comply with those well-thought-out established community standards.

A handwritten signature in black ink, reading "Gwen Springmeyer". The signature is fluid and cursive, with a long, sweeping underline.

Gwen Springmeyer
Greater Avenues Community Council Chair

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

a. All Letters

**COMMENTS IN REGARD TO IVORY HOMES APPLICATION TO REZONE 675 NORTH F STREET
AND AMEND THE MASTER PLAN**

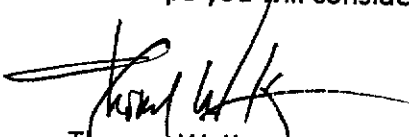
ATTN. Daniel Echeverria
Salt Lake Planning Division
451 S. State St. Rm.406
Salt Lake City, UT 84114-5480

May 11, 2022


We live at 415 E. 12th Ave., one block south of the Ivory site. This has been our home since 2001 when we moved to Salt Lake City after my retirement following a 32-year career as a real property and business lawyer. My real property clients principally consisted of property developers, and we were engaged in property development ourselves for over 25 years. As early homeowners in the newly created Capitol Park development area we have had a direct personal view of its evolution over the last 21 years as nearly 50 custom homes have been built and the Meridien and Wright Building Condominiums have been redeveloped. We have also followed the Ivory Development proposal for the 675 North F Street site carefully as it has evolved since the initial Application was submitted in 2020.

We oppose the rezoning Ivory is seeking for reasons that are covered in detail in the attached written submissions we have filed with the Planning Division. Although the Ivory project proposal has been altered somewhat since the initial filing, those changes have not altered the basis of our opposition. It centers on the fact that the requested rezoning creates too dense a development of the site and that density jeopardizes the success of Ivory's "experiment" for future homeowners in the Ivory project itself, for neighboring properties and, ultimately, achievement of City ADU housing objectives.

We hope you will consider our views as you review the Ivory Application.



Thomas W. Keen



Lynn A. Keen

**COMMENTS IN REGARD TO IVORY HOMES APPLICATION TO REZONE 675
NORTH F STREET AND AMEND THE MASTER PLAN**

ATTN Daniel Echeverria
Salt Lake Planning Division
451 S. State St. Rm. 406
PO Box 145480
Salt Lake City, UT 84114-5480

June 23, 2020

We are residents and homeowners within the Capitol Park Subdivision and we are members of the Capitol Park Homeowners Association. Our home is situated at 415 E. 12th Avenue. We share a rear lot line with the Meridian. **We strongly oppose the rezoning sought by Ivory Homes for the reasons set forth below.**

In context of the actual conditions of our neighborhood, the development plan outlined by Ivory Homes in its rezoning application does not satisfy the Purpose Statement of either the current FR-3/12,000 zone or the proposed FB-UN1 zone. We are signatories of a letter addressed to you by The Preserve Our Avenues Zoning Coalition, which provides specific details of the basis for our opposition, but we want to add a personal perspective based on our 19 years of residency in the neighborhood where the proposed development site is located.

We moved to Salt Lake City in 2001 following the purchase of our present residence. We had concerns about the purchase due to the then surrounding circumstances of the area north of our home site. The V. A. Hospital and Annex property had been largely abandoned for years and its lot was overgrown. Although Walter Wright and his wife were living in the Annex, it too, and its surrounding landscape, was not well maintained. Prior to committing to the purchase, I contacted the Salt Lake City Planning Director Larry Butcher for information about the history of that property and its probable future. He convinced me that, although it was a nonconforming use in our FR-3 zone, due to its historic status it would either be redeveloped as a high quality condominium or would be demolished and brought into compliance with the current zoning. We relied on that information in completing the purchase of our home and we waited and watched as events developed.

Finally, in 2004, we greeted with approval the Staff Report authored by Wayne Mills, the Principal Planner for the City, which recommended, with conditions, the rezoning of the V. A. Hospital and Annex property to a RMF-35 zone. We weren't alone in approving that recommendation. It was approved by our homeowners association, the Greater Avenues Community Council and other residents of surrounding properties.

In describing the effect of the proposed zoning amendment on adjacent properties, Mr. Mills stated as follows:

"Currently the main V.A. Hospital building is a dilapidated shell with broken windows. Restoring this building and creating a residential population base would be a significant improvement over current conditions. In addition, creating a condominium development would require improvements and continuous care of the open space areas surrounding the V. A. Hospital buildings, which may have a positive affect (sic) on adjacent property values." And he concluded his analysis with this finding "The proposed project will not adversely affect adjacent properties".

He was correct, but a similar statement cannot be made with respect to the Ivory Homes proposal. The City has identified a need for more affordable housing. But, the City has other housing challenges as well. When we moved to Salt Lake City in 2001 we were surprised to learn how difficult it was to find newly constructed residential housing in the Avenues and other areas of the City with adequate garage space and landscape areas. The Avenues, in particular, is comprised of small, older homes with little contiguous landscape areas. Many of the homes have converted former single car garages into enclosed residential space. So, the Avenues finds itself with lots of on-street parking. We felt fortunate to find our home on 12th Avenue. It was four years old at the time and had an enclosed garage and a rear lot that would give us some green space. If anything, new arrivals and current residents of the City seeking the type of housing that brought us to Salt Lake City will find an even smaller supply of available properties. Not only is the extremely dense housing proposed by Ivory Homes out of character with this neighborhood, it will not attract families with school age children that the City wants to add to our declining school enrollment.

It's perhaps ironic that just as this proposal is presented for consideration by the City, a countervailing societal trend has emerged which argues against increasing urban density. As it addresses issues of growth, the City has a decision to make....will Salt Lake City continue to be a community that is attractive to families and others seeking residences with adequate contiguous green space for private, personal use, or will it be built on a base of increasingly dense housing? The issue is particularly important today as the Covid-19 pandemic accelerates a growing trend among young married couples and others which favors single family detached housing with open space. The Ivory Home proposal, if approved, would create the densest housing in our area of the Avenues. Unlike the Meridian, a vertical structure that leaves a larger area of green space per unit than any of our homes in the Capitol Park Subdivision, the horizontal density of the Ivory Homes proposal leaves almost none.

In its application Ivory Homes describes its plan as an "innovative approach" and attempts to dismiss current FR-3/12,000 zoning as an outdated example of restrictive "Euclidian" zoning. But, there were and are good reasons for the current zoning. We live on the edge of a vast natural environment that the City sought to help protect by assuring that ample green space would be a part of contiguous residential development. The adjacent wildlife areas are still populated with deer, fox, quail, stoat, bobcats, cougar and a wide variety of birds. They visit our lot frequently, and the quail do so daily, year round. The Ivory Homes proposal completely ignores the proximity of City Creek Canyon and other wildlife areas to its north and west that inspired and justify the preservation of the current zoning. Upon careful analysis, the Ivory Homes proposal is not "innovative"; it is another example of a developer seeking to maximize the development potential of a site. The only apparent innovation of the proposal is the inclusion of rent generating ADUs on a grand scale to provide sales support for the extremely expensive principal residences.

That radical use of ADU's as rental units to facilitate sales of principal residences may not have been revealed to or understood by Salt Lake City residents as a possible outcome of the recent amendments to the ADU ordinance. For example, The "Guide to Accessory Dwelling Units" published by Salt Lake City reveals no prospect of such a development and a September 1, 2019 Salt Lake Tribune article authored by Tony Semerad quotes Jake Young, planning manager for Salt Lake County and strong advocate of ADUs, as follows:

"It's one unit at a time...It's not a subdivision or an apartment complex of 200 units. [They] 'have little impact on actual neighborhoods and streets. They often blend in and are unnoticed'".

The Ivory Homes proposal is out of place in our neighborhood, whatever merit it may have in context of neighborhoods actually qualifying for FB-UN1 zoning. If it is approved for the proposed Avenues development site a new species of zoning will have been created in Salt Lake City. It can be named "Houstonian zoning" (anything can go anywhere)! To this point in our residency in Salt Lake City we have felt that we and the Avenues have been protected and well served by decisions of the City planning and zoning authorities. This proposal represents a challenge to that record. **For all the foregoing reasons we, and every one of our neighbors with whom we have discussed the proposal, strongly oppose it.**

Thomas W. Keen
Lynn A. Keen

tomak2@aol.com

COMMENTS IN REGARD TO REVISED APPLICATION OF IVORY
DEVELOPMENT TO REZONE 675 NORTH F STREET AND AMEND THE MASTER PLAN

March 1, 2021

Dear Mayor Erin Mendenhall, Council Member Wharton and Senior Planner Daniel Echeverria

My wife and I live at 415 E 12th Avenue, which abuts the Meridien Condominium property along its southern property line and is one block south of the Ivory Homes project site. **We oppose the requested rezoning.** Although it has made minor changes in its development plan, Ivory Development has not altered its initial rezoning request and all of the objections that we previously expressed on June 23, 2020 remain unaddressed. Please treat this letter as a continuing objection to the requested rezoning. We also request that you reread our June 23rd letter. Housing trends set in motion by the Covid-19 pandemic make our earlier objections even more relevant to the issue you face.

This may be Salt Lake City's last chance to avoid making a serious mistake by approving a radical, untested *"first of its kind in Utah plan"* (the quoted words of Christopher P. Gamvroulas, President of Ivory Development, January 26, 2021). This is a housing proposal that is so radical that it should have never gotten past initial discussions with City officials, yet the developer implies that it enjoys support from the City and is engaged in an aggressive campaign to secure full approval for the project.

As you know, the plan involves the extensive use of independent functioning ADU's coupled with a rezoning of the current FR-3 zone to a FB-UN1 zone thereby increasing the number of permitted lots. This *"first in its kind in Utah plan"* would permit the construction of 35 dwelling units on land originally zoned for 11 single family houses on 11 lots. The plan would convert the 11 lots to 20 through the rezoning and then incorporate ADU's within 15 of those 20 lots to produce 35 dwelling units. That is 318% of the currently permitted occupied structures on the 3.21 acre development site. While the plan is being promoted as the solution to a multigenerational housing problem, Utahans have long dealt with multigenerational housing problems by constructing separate living areas, often including kitchens and separate entrances, within the footprint of their existing homes. Many of the larger homes in the Greater Avenues area include these separate areas. Ivory Development could do the same thing without any rezoning. But the dwelling units in *"the first of its kind in Utah plan"* have been designed to assure that the purchaser of a principal residence need not worry about living with other generations of their family. The ADU's are fully independent of the principal residences in all respects and are really rental units, just like those being built elsewhere throughout the City. And, because they are fully independent, they result in the principal residences being reduced in size and require the dedication of large surface areas of the development site for duplicative driveway, parking and other functions dictated by their independence. So, what is gained in terms of the number of dwelling units is lost in terms of outdoor amenities, open space and quality of life considerations for occupants of all the dwelling units and even their neighbors outside the development area. There may be other areas of the City where a *"first of its kind in Utah plan"* would be appropriate, but this site has some unique attributes which make it particularly inappropriate. It is not within easy access to public transportation, employment opportunities, retail shopping, recreational areas or other of the requisite preconditions for this type of development. This is a neighborhood that requires the use of automobile transportation.

Moreover, the development site is only a few hundred feet from a wildlife area consisting of thousands of acres. Ivory Development completely ignores this fact, though it did secure a token environmental study

which is confined only to the 3.21 acre site. Not surprisingly, it showed no adverse environmental concerns with the proposed development. The site has been denuded of all vegetation, except for a few mature trees, fewer trees than we have on our own .25 acre lot. The wildlife that SWCA Environmental Consultants could not find on the denuded site are alive and well in our neighborhood, one block to the south of the studied site. There they can be found daily, feasting on insects, pine nuts, vegetation and occasionally one another. These include species that migrate to and from City Creek Canyon. They merely need to cross the empty development site to find food and shelter, something that would be made difficult as a consequence of the *"first of its kind in Utah plan"*.

It's no wonder that this proposal has aroused widespread opposition, not only throughout the Greater Avenues, but throughout the City. If approved by the City this *"first of its kind in Utah plan"* would create a precedent for a similar corruption of existing zoning and housing patterns throughout the City. How did we get here? The plan exposes to public scrutiny for the first time that an aggressive exploitation of the ADU concept, coupled with a more favorable zoning status, could result in a multi-unit residential site morphing into one with 3 times the number of previously permitted dwelling units. This was certainly not understood by the general public, or perhaps even ADU housing advocates, when the recently adopted ADU legislation was under consideration. For example, Jake Young, planning manager for Salt Lake County and a strong advocate for ADU's was quoted in a September 1, 2019 Salt Lake Tribune article as follows:

"It's one unit at a time...It's not a subdivision or an apartment complex of 200 units. [They] have little impact on actual neighborhoods and streets. They often blend in and are unnoticed"

Was he unaware of the potential for this *"first of its kind in Utah plan"*, or was this part of an effort to allay the public's natural concern for the impact of a new law affecting their homes and neighborhoods?

There is nothing in the ADU ordinance itself or the “Build An ADU, Guide To Accessory Dwelling Units” published by the City that suggests the possibility of incorporating ADU’s into a multi-lot development. Whatever the City officials thought at the time, the public was never made aware that such a development could be done and, even more shocking, that it could be done in combination with a rezoning of the sort proposed here by Ivory Development. Since there was no public awareness of this prospect prior to the adoption of the ADU ordinance, the “*first of its kind in Utah plan*” is a first in more ways than one.

Ivory Development would like you to believe that opposition to the development plan is, in part, a case of NIMBYism. Professor Nelson was obliging enough to refer to this phenomenon in his September 28, 2020 opinion and even provided a footnote citation in support of this supposed obstacle to the proposed development. But, this is a project that is opposed by citizens living throughout the Greater Avenues. That’s a big, diverse, sophisticated, well educated, liberal neighborhood! Mere allegations of NIMBYism can’t be used to denigrate and dismiss all opposition to change. In fact, what the “*first of its kind in Utah plan*” is facing is really an informed electorate, and democratic control is still the ultimate test that developers, and even well intended housing experts and public officials, must meet.

The NIMBYism suggestion is particularly galling to those of us who are immediate neighbors of the proposed development. The redevelopment of the former sites of the Children’s and VA Hospitals which began in the 1990’s has taken nearly 35 years and is only now nearing a conclusion. To this point it has been challenging for developers and purchasers of residences. Many of the initial developers were undercapitalized and the site required the construction of expensive infrastructure, including private streets. A particularly serious challenge was created by the historic VA Hospital and its Annex. The residents of the Greater Avenues area, the City itself and the initial developers wanted to restore and readapt the building to residential use. Meanwhile, construction of single family homes began on the parts of the overall development area which were suitable for new residential development. This was done in accordance with the applicable FR-3/12000 zoning, but sales and construction progress was slow. Prospective purchasers had to suspend their understandable disbelief that the VA Hospital and Annex could be successfully restored and

readapted to residential use. Those of us who purchased homes in the Capitol Park Subdivision took large financial and other risks when we committed to make our homes in this area. Eventually, in the mid 1990's, conditional RMF-35 zoning approval was given to the VA Hospital and Annex site, but finding a sufficiently capitalized developer and addressing myriad construction, infrastructure, planning, lot split, legal and financing issues still lay ahead. Ivory Development has now acquired the last remaining portion of the overall development site, including access to infrastructure that was created by the efforts, investments and risk taking of others over the previous 35 years. It seeks to build an overly dense, environmentally insensitive "*first in Utah*" collection of "*cottages*" at the principal entrance and gateway to a system of private streets created and maintained largely by others, including the Meridien Condominiums, the Wright Building Condominium and the Capitol Park Home Owners Association. **Yes, this is our yard, but it's our front yard!**

In considering the Ivory Development Proposal, the City should address this question....What would have happened if the Ivory Development "*first of its kind in Utah plan*" came first, rather than last? Would the Meridien and Wright Buildings have been saved and redeveloped? Would the houses throughout the Capitol Park Subdivision exist in the form they do today? Would this area of the City be as attractive to families? Would the tax revenues of the City be enhanced? Would the Avenues be a better neighborhood in which to live? Ironically, if approved by the City, the precedent which would be created by the "*first of its kind in Utah plan*", and the process of its approval, may make it harder to get a second of its kind.

Thomas W. Keen and Lynn A. Keen

415 E. 12th Ave., Salt Lake City, UT 84103

**COMMENTS IN REGARD THE IVORY HOMES APPLICATION TO REZONE 675 NORTH F STREET TO
ZONE SR-1 AND TO AMEND THE MASTER PLAN
MARCH 31, 2021**

ATTN Daniel Echevarria
Salt Lake Planning Division
451 S. State St. Rm. 406
Salt Lake City, UT 84114-5480

Ivory Homes has now submitted a third proposal for rezoning of this site. **Sometimes the answer can only be "NO"**. No person or entity, not even "Utah's Number One Homebuilder", is entitled to unilaterally select the zoning for their property. Zoning decisions belong to others following established legal processes and standards. The Planning Staff of the City reports that it has not completed a review of the proposal and has solicited our input as interested members of the public. We are told that the Planning Commission has not even scheduled a public hearing. Yet, a spokesperson for Ivory Homes recently told a Building Salt Lake reporter that **"The City Council is going to pass this. Ivory has worked closely with the City from the beginning, and planning staff knows about the opposition in the neighborhood and thought that this would be an easier zone for them to support"**. Ivory Homes has distributed marketing materials throughout the Avenues titled "Welcome to Capitol Park Cottages" that imply City approval has been secured and has erected a development sign at the site that also implies the project has been approved and sales are being made. The apparent inconsistency in what we are being told by the City and the public declarations and actions by Ivory Homes is disturbing.

Whatever the source of the latest gambit, SR-1 zoning is clearly not an appropriate zoning district for the Ivory Homes development plan and the Capitol Park Subdivision site. One need not look beyond the Purpose Statement for that zoning district. Section 21A.24.080 subpart A provides, in part:

"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.... The standards for the district are intended...to preserve the existing character of the neighborhood."

The SR-1 zoning district was created to preserve an already developed, mature part of the Avenues. Although the district was and is primarily composed of single-family and two-family homes, it also includes businesses and other uses that developed slowly over a long period of time and became part of the fabric of the residential area. The zoning district was intended to preserve the existing, primarily single and two-family, residential character of this district and to protect it from the intrusion of new development that would conflict with that historic character.

The Ivory Homes proposed development does not preserve the history or character of any part of the Avenues and, in fact, it is actually **"a first of its kind in Utah plan"** according to the president of Ivory Development. If approved as proposed it would conflict with the character and decades long history of the Avenues development area in which it is situated as well as that of the SR-1 district. The Ivory Homes site is the final undeveloped parcel in a subdivision that was conceived of nearly 30 years ago as result of the relocation of the VA and Children's Hospitals to other parts of the City. Because this is an environmentally sensitive area on the flanks of City Creek Canyon, it was appropriately classified in the FR-3/12,000 Foothills Residential District.

Also, one need not look beyond the Purpose Statement of the FR-3/12,000 zoning district to test the appropriate classification for the Ivory Homes development site. Section 21A.24.040 subpart A provides, in part:

"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.....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..."

Ivory Homes chooses to ignore the fact that the site is in the Capitol Park Subdivision and is part of a collection of parcels which have been developed over the last 25 years in compliance with the FR-1/12,000 and RMF-35 zoning classifications. It seeks to fully utilize the private street and other infrastructure created and sustained by other parcels within that subdivision without adhering to the zoning that has guided the development of the subdivision. It even has the temerity to adopt the **"Capitol Park"** name for its **cottage** development as it simultaneously seeks to escape the zoning which has guided development of the subdivision and given value and credibility to that name. Sometimes the answer can only be **"NO"** and now is the time for the City to deliver that message.

NO, because the "plan" is really an experiment. It's an experiment based on exploitation of ADU's in a manner that is not explicitly listed among the **"Methods of Creation"** for ADU's in 21.40.200, subpart D of the ADU ordinance and was never revealed to the public when the ordinance was under consideration. The ordinance refers to newly constructed ADU's but omits any suggestion that they could be massed as part of a large residential development. In fact, the ADU concept has always been presented to the public as involving the decisions of individual homeowners with respect to their existing property. In the words of Jake Young **"It's one unit at a time"**. Ivory Homes has built this experiment on an interpretation of the ordinance that certainly was not understood by the public and perhaps not even understood by the supporters of the legislation.

NO, because experiments can go awry. Ivory Homes has also carefully tailored its presentation to the City of this **"first of its kind in Utah plan"** as an innovative form of **"multi-generational**

living". Virtuous as that sounds, there is really no need for the occupants of a principal residence or it's ADU to have any familial relationship. Ivory Homes has designed the principal residences and ADU's so that they serve as totally independent units. This is an age of short-term rentals by vacationers and others. Will there be a high rate of turnover in occupancy of the ADU's? Will nonresidential uses of the ADU's for business operations develop? "Home Occupations" are permitted in ADU's under Subpart E.1.(f) of the ADU ordinance. Under Section 21A.36.030 of the Salt Lake City municipal ordinances virtually any business can be conducted as a "Home Occupation" in an ADU, subject to a licensing process administered by the City. The Ivory Homes marketing materials stress the possible use of "cottages" as "home offices". Does an ADU serving as the Home Occupation office of the owner of the principal residence meet the "incidental and secondary to the primary use of the dwelling" test of Section 21A.36.030, Subpart G (1)? For example, can a lawyer or other professional who owns a principal residence dedicate the entire ADU associated with that residence to a fully staffed professional office? What are the parking, traffic and other implications of operating that type of Home Occupation office in a residential development? Does the City have a record of success in learning of and regulating "Home Occupations"? With the passage of time will the ADU's in the development become a collection of rental units occupied by businesses, vacationers and short-term renters? What management structure will be in place to control the inevitable conflicts created by these disparate uses when parking, noise, property maintenance and other issues inevitably arise? What effect will this development have on the neighboring properties if these management challenges are not successfully managed? The Ivory Homes project sign states "We'll Build The House", "You'll Build The Home". It should read "We'll Launch The Experiment", "You'll Live With The Consequences"!

NO, because this is the wrong location for this experiment. As has been emphasized earlier in these comments, the development site is the final undeveloped parcel in a subdivision that was conceived of nearly 30 years ago and since then has been developed slowly and carefully pursuant to zoning classifications that were established to protect and preserve two historic buildings and an environmentally sensitive area. The City needs to carry through on the long-term guidance that its past zoning decisions provided to those of us who faced long-term decisions to actually "make", not just "build" homes. Ivory Homes has not become "Utah's Number One Homebuilder" (an identity protected by its registered trademark) as a result of lingering over building sites following the completion of construction. However, we and the City will have to live with the consequences of its "first of its kind in Utah plan." For the City the risk is that this "first of its kind" experiment will become the "last of its kind" as it looks for tools to address a City-wide housing need. For those of us who live here the risk is greater. This is our only neighborhood!

Thomas W. and Lynn A. Keen
415 12th Avenue
Salt Lake City, UT 84103

COMMENTS IN REGARD TO IVORY DEVELOPMENT PROPOSED PLANNED DEVELOPMENT AND SUBDIVISION APPLICATION FOR 675 NORTH F STREET

We are homeowners who reside at 415 E 12th Avenue, one block south of the development site. This is our fourth submission of comments regarding this project. Our previous submissions should be read as supplementing the following objections to the proposed Ivory Development ("Ivory") Capitol Park Cottages ("Project").

Unlike many requests for rezoning and planned development approval, Ivory admits in the Narrative portion of its submission that *"developing and building this property with multi-million-dollar homes would be easy for us..."* This is apparently intended to suggest that the entire surrounding area is composed of such homes and that such a development is within a recognized skill set of Ivory. **But what is important about that statement is that Ivory, which purchased the property with knowledge of its current zoning, is admitting that there is no condition of the site which makes compliance with current zoning a hardship for development.**

The rezoning, planned development treatment and other concessions sought by Ivory are to permit it to construct a vanity project which it has repeatedly described as *"a first of its kind in Utah plan"*. In its most recent submission to the City it states that it is *"an opportunity to do a demonstration project of sorts..."*. In an article that appeared in the December 26, 2021 issue of the Salt Lake Tribune Ivory's Chris Gamvroulas described this development concept as an *"experiment"* and admits that *"ADU's are kind of an untested market in Utah"*. **So, Ivory is asking the City to grant unneeded concessions for an untested, experimental development on a site that is the last undeveloped parcel in the Capitol Park Subdivision.** That subdivision has been developed over the last three decades by over 50 individual homeowners who have built their single family detached homes in reliance upon and in compliance with zoning guidance and restrictions established by the City. Ironically, while seeking to utilize the Capitol Park name and access to the private street that serves the subdivision, Ivory simultaneously seeks special exemption from the zoning and building standards that have guided the subdivision's development since its inception.

There's a principle that has guided health care professionals for centuries...FIRST DO NO HARM. Real property developers who seek to be "first" or to "do a

demonstration project of sorts", and the City reviewers and decisionmakers who are being asked to approve such a project, should apply that principle by assuring that there is no harm created for others who have made significant housing decisions in reliance upon and in compliance with preexisting standards established by the City.

Ivory has resorted to name calling in lieu of addressing the issues raised by those of us who live in the Capitol Park Subdivision. We are accused of NIMBYism. However, name calling is the last resort of those who can't address objective truths. The harms inherent in the Project are not only obvious to those of us who live in the Capitol Park Subdivision, but to those who live throughout the Greater Avenues area. **All three of the homeowner associations that represent adjacent developments have voted in opposition to the Project. The City has received a petition opposing the rezoning from 2,100 residents of the Avenues and in a referendum conducted by the Greater Avenues Community Council the rezoning was overwhelmingly opposed by a vote of 1,244 to 25. Most of the petition signers and those who voted in opposition to the rezoning live outside the immediate area of the Project itself.** So, opposition to the rezoning which is central to the Project is broad based. The specific harms that approval of the Project threatens are detailed in the numerous written objections that have been addressed to the City by us and many others.

But the greatest harm that this Project threatens is the loss of trust by the public in the decisions of our public institutions and government. Zoning approvals can't be a mere popularity contest, but there are many reasons why this Project, if approved, will raise important questions as to the fidelity of the City to its own laws. **The City is pressured by a growing population that seeks affordable housing. In its search for answers to that challenge the City has been seeking to facilitate the creation of ADU's, but the concept has not been shown to be popular among existing homeowners and the ADU ordinance does not permit anyone other than a natural person living on the property to create an ADU.**

Prior to the adoption of the most recent ADU ordinance, residents of the City were assured by ADU proponents that:

“it’s one unit at a time...It’s not a subdivision or an apartment complex of 200 units. [They] have little impact on actual neighborhoods and streets. They often blend in and are unnoticed”.

But this is actually what Ivory is proposing...a subdivision containing what could be called 14 potential ADUs (“PADUs”). The City’s ADU ordinance only permits the creation of ADUs by an “owner occupant” who “lives on the property within either the principal or accessory dwelling unit.” It defines “owner occupant” as “an individual who is listed on a recorded deed as an owner of the property; any person who is related by blood, marriage, adoption to an individual who is listed on a recorded deed as an owner of the property; or an individual who is a trustor of a family trust who possesses legal ownership of the property”. As a developer Ivory can’t create an ADU, so it is proposing to construct residential structures that could later have a portion of their interior space qualified as ADUs by individual purchasers of those residential structures once they take title. Only in that case would the PADUs be available to serve as rental units and create the additional residential units the City is seeking.

In the Narrative submitted by Ivory in support of the Project it engages in an exaggeration of what it is offering to the City. It uses the term ADU when in fact it is really offering PADUs. Here is its description of the Project’s meaning for the City:

The approval of Capitol Park Cottages would provide for a 22% increase in approved ADUs in Salt Lake City and would increase District 3’s approved ADU stock by 300%. When Capitol Park Cottages is constructed, its 14 ADUs will outpace the expected city-wide total of 13 new ADUs/year.”

Ivory is asking the City to let it build 14 PADUs and then hope that subsequent owner occupants will elect to qualify them as rental ADUs. Ironically, the current FR-3 zoning would ultimately permit the creation of 11 ADUs if so desired by purchasers of the 11 single family homes now permitted to be constructed on the site. Thus, 79% of the results outlined in Ivory’s Narrative could be realized without rezoning. But Ivory isn’t content with only securing City acceptance of this novel PADU concept, it is seeking two more concessions from the City. The first is rezoning of the site to SR-1 district status and the second is Planned Development treatment for the Project. The purpose of the

additional concessions is to permit a supersizing of the number of primary residences on the site. Each of these requests is without merit under the applicable ordinances of the City.

This is the provision from the ordinances of the City that explains the role of an SR-1 zoning 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....The standards for the district are intended...to preserve the existing character of the neighborhood”.

But Ivory isn't preserving anything and its proposed *“first of its kind in Utah's plan”,* and *“demonstration project of sorts”* is out of character with the other single family detached homes that have developed in the Capitol Park Subdivision over the last three decades in compliance with the FR-3 zone created by the City. The private street serving the Ivory property and the adjacent developed property to its west creates a common identity and interdependence that makes rezoning of the Ivory site to SR-1 status inappropriate.

Similarly, Ivory's plan for the Project does not meet the threshold requirements for Planned Development treatment under the City's Planned Development Ordinance. The Purpose Statement for Planned Development treatment of a proposed project lists several objectives meriting special treatment. Here's a portion of that Purpose Statement:

“A planned development will result in a more enhanced product than would be achievable through strict application of land use regulations, while enabling the development to be compatible with adjacent and nearby land developments. The City seeks to achieve at least one or any combination of the following objectives through the planned development process.”

However, Ivory fails to identify any feature of the site that makes strict compliance with land use regulations problematic. Nor does it cite any enhancement to the Project which is made possible by Planned Development treatment. In fact, in the Narrative Ivory describes the site as *“incredibly unique”* and a *“scarce opportunity”* because of the ease of its development.

In an effort to find a qualifying Planned Development objective Ivory appears to rely primarily on the "Housing" objective listed in the ordinance. The ordinance describes that objective as follows:

*"Housing: Providing **affordable** housing or types of housing that helps achieve the City's housing goals and policies:*

- 1. At least twenty percent (20%) of the housing must be for those with incomes that are at or below eighty percent (80%) of the area median income.*
- 2. The proposal includes housing types that are not commonly found in the existing neighborhood but are of a scale that is typical to the neighborhood."*

Ivory has provided no assurance of affordability for the residences in the Project and has not and cannot even assure that ultimate purchasers of residences in the Project will elect to submit a portion of their PADU equipped homes to actual ADU status. Moreover, the design of the proposed Project conflicts with the other objectives listed in the ordinance as qualifying a proposed project for Planned Development treatment. These include maintaining open space and natural lands, historic preservation, creating enhanced mobility and accessibility connections and sustaining natural systems. Ivory's proposed plans for the site involve removing all trees, completely altering its natural terrain, constructing a complex system of large retaining walls, and covering the site so completely with hardscape development that a large storm water retention basin is needed.

Ivory is using the lure of 14 PADUs to secure City approval of a development plan that requires City acceptance of the risk that purchasers of principal residences containing the PADUs may not qualify them as ADU rental units. In exchange for that unknown outcome, Ivory is also seeking rezoning and an inappropriate use of the Planned Development approval process in order to supersize the Project. Meanwhile Ivory is marketing those PADUs as housing for large families and home offices. Given the fact that there is a market demand for large single family homes containing home offices, few ADU rental units may actually be added to the housing stock of the City. That would mean that a supersized residential "demonstration project of sorts" will have been created which is completely out

of character with the surrounding property and which fails to advance the affordable rental housing goals of the City. FIRST DO NO HARM.

Thomas W. Keen and Lynn A. Keen

Echeverria, Daniel

From: m <[REDACTED]>
Sent: Tuesday, November 30, 2021 2:17 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Sneaking this in over the holidays

Hi Daniel,

I saw your email about the Capitol Park Cottages update, sent November 29. Regarding the proposed Ivory Homes Development in the Avenues, please add my opposition to the tally of voices against this disastrous plan. The Avenues is not the place for more high-density, cheap, poorly constructed, cookie-cutter subdivisions. People who live in the area don't want this development and it couldn't be more obvious. The City has chosen to ignore the residents in this community and put profit over morality. Shame on all those involved.

Thanks,
Connie B.

Echeverria, Daniel

From: Laura Davis <[REDACTED]>
Sent: Monday, January 3, 2022 1:36 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Letter in Opposition of Rezone Application-IvoryHomes 675 N. F St.

Dear Mr. Echeverria,

I am writing in opposition to the Ivory Homes Application to Re-zone 675 North F Street.
I am a homeowner living on F Street within 1.5 blocks of the proposed development.

Of great concern to me is that this level of density is too dense and is inappropriate for this foothills location which lacks the infrastructure to support it. In addition the proposed density raises concerns about water runoff, and loss of wildlife habitat in our treasured community.

I am especially opposed to this proposed Re-zoning due to the additional auto traffic this proposed density would bring to this portion of the neighborhood. The City's 5-Year Housing Plan clearly states that high density developments need to be in walkable areas of the city close to shops, restaurants, work, public transport, etc. This is not such an urban location. An additional 70 cars will add to the city's air pollution problem and lead to greater congestion on our already crowded Avenues streets.

People who purchased homes adjoining this lot expected that FR-3 zoning would continue to be enforced. Changing this zoning so drastically breaks faith with these residents who have chosen to build their lives and pay their taxes in Salt Lake City.

As a resident of the Upper Avenues community I continue to voice my opposition and support the community's opposition to Ivory's rezone proposal. Thousands of residents have registered their opposition with overwhelming votes against the rezone.

These are just a few points that are of concern to me in opposition of the Ivory Homes Application to Rezone 675 North F Street and I appreciate the opportunity to voice these concerns and my opposition to the Rezoning.

Sincerely,
Laura Davis

Echeverria, Daniel

From: Joseph Flanagan <[REDACTED]>
Sent: Sunday, January 16, 2022 11:27 AM
To: Echeverria, Daniel
Cc: Aira Flanagan
Subject: (EXTERNAL) Concerning Ivory Homes in the Avenues

Dear Mr Echeverria,

We recently purchased a home at 364 Capital Park Ave Unit 300 and are excited to move into the neighborhood. We were very surprised to see the development by Ivory Homes across the street. We selected this neighborhood because we felt it was still retaining the balance of community and not over-development. My wife and I wanted to share our frustration and concern at the potential for such a development. Please let us know what is the best channel for us to communicate the concern and our strong hope that this project does not go thru.

Thank you and best regards,
Joe and Aira Flanagan

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Echeverria, Daniel

From: Doug Grossman <[REDACTED]>
Sent: Monday, November 29, 2021 4:15 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) RE: [Ext] 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

Thanks Daniel,
With 19 units/ADUs, that is 38 dwellings which is way beyond the 11 homes that the lot is zoned for.
We are concerned that this is not in the character of the neighborhood and about the increased traffic to the area.
We oppose this proposal.
Thanks
Doug

Douglas Grossman, MD, PhD
Professor, Department of Dermatology
Investigator, Huntsman Cancer Institute
Co-Leader, Melanoma Center
University of Utah Health Sciences Center
Phone: [REDACTED]
Email: [REDACTED]

From: Echeverria, Daniel <[REDACTED]>
Sent: Monday, November 29, 2021 3:59 PM
Subject: [Ext] 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

Good afternoon,
You are being provided this update about the 675 N F Street development proposal as you have previously contacted the Salt Lake City Planning Division about the property owner's development proposal.

The property owner, Ivory Development, originally submitted a Zoning Map and Master Plan Amendment to the City in 2020. The applicant requested that the City pause processing those petitions while they refined their proposal and has now submitted a Planned Development and Preliminary Subdivision application to accompany those two original petitions.

The Planned Development and Subdivision applications propose a 19-lot single-family home development for the property, titled "Capitol Park Cottages." Each single-family home is proposed to include an accessory dwelling unit. Two parcels are proposed to be reserved for a private park and a guest parking area within the site. The applicant is still seeking to amend the zoning of the property from the FR-3/12,000 (Foothills Residential) zone to the SR-1 (Special Development Pattern Residential) zone to allow their requested number of lots.

With these two additional applications in, the applicant has requested that the City resume processing the petitions. All four petitions will be processed concurrently.

Details on the applications, including the City review criteria, FR-3 and SR-1 zoning information, the final decision maker on each application type, the applicant's narrative, and the proposed development plans can be accessed from the City's Open House webpage for the proposal here: <http://bit.ly/slc-openhouse-01175> Please expand the "Additional Information" section for a list of downloadable materials.

Echeverria, Daniel

From: Nancy Nunn <[REDACTED]>
Sent: Wednesday, January 5, 2022 1:23 PM
To: Echeverria, Daniel
Cc: Alan Hayes; Wharton, Chris
Subject: (EXTERNAL) Ivory Homes re-zone

Importance: High

I have lived in the Avenues for over 50 years. This neighborhood is so special and for many reasons, among them:

The wide variety of home designs

The wide variety of our neighbors including but not limited to; ethnicity, sexual orientation, religion, education, income level.

There is no place in our area for 19 homes and 14 ADUs. That is a far too dense development. Rezoning should be off the table for the Avenues. We have survived and prospered for over 100 years without this kind of development.

I live on 7th Avenue just West of "E" Street. At this point in time, traffic is, at times, already a problem on "E" Street.

Adding an additional 33 to 66 cars using "E" Street as the most probable route is not acceptable.

To call these affordable housing is at best laughable.

We want our college students, dog groomers and walkers, scientists, artists, lawyers, retirees, educators, etc. – to all feel welcome here. If rezoning gets a foothold, who knows what developments might happen in the future. That prospect could mean more residents could be pushed out primarily by economic reasons.

I close by remarking on Ivory Homes representative who spoke at the Avenues Community Council meeting in 2020. In my opinion, his attitude was arrogant and ignorant. He obviously felt that Ivory Homes had a right to do what they wanted and Avenues residents opinions didn't matter. I also feel that he was less than truthful and that does not make me comfortable with believing what Ivory has to say about this project.

I am completely against this rezoning!

Nancy Nunn
381 7th Ave

Echeverria, Daniel

From: Mitchell Peterson <[REDACTED]>
Sent: Monday, January 10, 2022 12:26 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Development

Hello Daniel,

Thank you for presenting at the GACC meeting last week. As the owner of the lot on 1484 Tomahawk, I just went through a special exemption request, so I understand the exception request process a little bit more now than I did last year. I do not envy you, and hope you do not catch too many mistargeted attacks. I would like some more information as well as to provide some comments and questions on the ivory development:

In the GACC meeting, Ivory Homes did not attempt to answer how the proposed plan would be an improvement on a plan that strictly complies to the zoning guidelines. They instead opted to laugh and say that they will only talk about the proposed plan. As I understand it, providing evidence that the neighborhood will end up with a better end result is a main requirement of getting just a relaxing of the guidelines, let alone a complete zone change. The only justification they provided is to say that they want to see if building homes with ADU's will help people afford a higher mortgage payment. This experiment can be just as easily done in a strictly complying development, so the need for the zone change is not warranted. One could also argue that this experiment has been done before, and that the answer to the question posed is of course, "Yes". Renting out a portion of your home will help offset the cost of the home. No further data is required.

Ivory Homes stated on multiple occasions that the existing retaining walls are over 14ft. I have walked by that property many times and nowhere do the existing retaining walls even exceed 5ft. This is a blatant lie and attempt to deceive the public. The property does have a slight slope to it, but they certainly do not face hardships greater than the properties that neighbor the East side of F Street. Granting approval for any retaining in excess of what is across the street is unwarranted.

The current zoning asks if a design better suited to the site can be achieved by strict compliance with the regulations. On this property, the answer is obviously yes. I can draw up a development on this lot that keeps retaining walls within compliance as well as the number of homes and lot sizes. If I can do it, I know that their architects are capable of achieving the same.

It is clear that the only reason Ivory Homes wants to build so many homes on this property is to extract the maximum amount of profit they can, regardless of the negative impact it will have on the community. I am not opposed to having the property developed, or maximizing profit, it just needs to be done in such a way that it does not cause harm to the surrounding community.

The Zones were put in place to preserve the character and feel of the neighborhoods. It is not right to allow a developer to completely change the character and feel of the neighborhood for the sole purpose of extracting wealth. The FR-3 Zone is intended to be a Very Low Density neighborhood. This is the main reason that I am building my family home here and is the type of community that I want to raise my sons in. Had I wanted to live in a medium or high density neighborhood, then I would have bought land in a different location. Ivory Homes should have done the same.

There is still a lot of land available in the FR-3 Zone. Most notably I am speaking about the large flag lot located North of Popperton Park between N Virginia St and Chandler Dr. Currently, that lot is very difficult to build homes that strictly conform to the FR-3 Zone. However, if Ivory Homes is granted the change of zone when they face little to no topographical hardships, then there will not be any justification for not granting a zone change on this land, which would result in the building of many condo type homes here.

In Summation, there has not been a reason provided as to why Ivory Homes needs to build the proposed development instead of one that strictly conforms. They have made no effort to build homes that account for the natural topography of the land (which is really easy in this case). Ivory Homes will be able to achieve all of their stated goals developing the land in a way that strictly conforms to the current zoning regulations. There is no reason to harm the community and open the community up to further harm.

I would like to be able to speak on this at any and all public hearings that will be coming up in the future. Would you please point me to where I can find out when and where these meetings are going to be happening? Thank you for your time and talking with the community on this matter.

Mitchell Peterson

Echeverria, Daniel

From: Wayne Potts <[REDACTED]>
Sent: Monday, December 13, 2021 9:20 PM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) proposed rezoning of 675 North F Street

Dear Mr. Echeverria,

We write to strongly object to the Ivory Homes rezone. Our house is right above the development site and I have been riding my bike for the last 25 years on my daily bike ride into City Creek (via Capitol Park Avenue), directly past the development site. I chose this route because it is the most bike friendly route (fewest cars and most beautiful path) into City Creek. The Ivory Homes development would completely change the idyllic environment of this and surrounding neighborhoods.

Despite our financial advisors recommendation to invest my money for retirement into in the stock market, we took all of our life's savings to buy in this neighborhood because it was our judgement that investing in this neighborhood was the best way to grow and guard our retirement. We were correct and most financial advisors were wrong. Part of our judgement was based on the zoning for this neighborhood that guaranteed any development would keep the beautiful, unique, low density nature of this area intact. Allowing the Ivory Homes development would be a betrayal of all the homeowners in this area that moved here because of the special nature of this neighborhood, while still close to downtown and the University. It would be a betrayal of the essence of zoning neighborhoods, to keep their character intact by not allowing commercial interests to intrude. As far as we can tell, the Ivory Homes proposal would primarily benefit the financial interests of Ivory Homes, while degrading the financial interests of all the homeowners in this wonderful neighborhood. Please do not betray your charge to protect neighborhoods from unnecessary, disruptive commercial interests. This area could be developed beautifully within existing zoning.

Wayne Potts and Patricia Slev

Echeverria, Daniel

From: Bruce Reitz <[REDACTED]>
Sent: Monday, November 29, 2021 4:39 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Capital Park Cottages

Daniel Echeverria

I am opposed to the construction of so many homes especially they essentially each have a mother-in law apartment in each dwelling. That number of families and their tenants would create much more traffic in that neighborhood.

Homes built on that piece of land should reflect the type of dwelling already in that neighborhood, not a bunch of essentially duplexes on that property.

Ivory should build tasteful single family homes similar to other homes in that area.

Consideration should be given to the influx of traffic into this area, which is for the most part single family homes.

Bruce Reitz
a neighbor

Echeverria, Daniel

From: MARC J RUSSON <[REDACTED]>
Sent: Sunday, December 12, 2021 9:07 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Here we go again with Ivory

Mr. Echeverria,

At some point, the planning division should tire of the Ivory shell game and realize that this process threatens to cast a pall over the planning division itself. The people have spoken and rejected Ivory's attempt to re-write the rules for land they purchased ***with full understanding of the zoning restrictions for the property***. Ivory must be told to either observe the FR-3 zoning or sell the property to someone else.

This smacks of the all to typical Utah politics of money trampling ordinances and people. Support our citizens. Enforce the legally established FR-3 zoning. Do not be sullied with dirty money and influence which is the shameful legacy of Ivory Homes. The rationale to "do the right thing" has been explicitly laid out in the POAZ Coalition submissions as well as over a thousand citizen responses - citizens who actually live in the avenues.

V/R

Marc Russon
832 Northcliffe Dr
SLC Ut 84103
[REDACTED]

Echeverria, Daniel

From: Matthew Tyler <[REDACTED]>
Sent: Wednesday, December 8, 2021 5:24 PM
To: Echeverria, Daniel
Subject: Fwd: (EXTERNAL) Rezone of lot on Capitol Park Ave and F St [ref:_00Df43i8c._5005GeJo3n:ref]

Dear Mr. Echeverria,

I am writing to express my opposition to the rezoning of the lot located on the corner of Capitol Park Avenue and F Street as proposed by Ivory homes. I do not oppose development under the current zoning, which as I understand would allow 11 single family homes with 11 additional dwelling units (ADU) for a total of 22 housing units. However, permitting changes to the established foothill zoning restrictions would have a negative impact on the community.

F Street and Capitol Park Avenue are ill suited to handle increased traffic. Capitol Park Avenue is a private street which was developed as part of a PUD and as such does not meet city requirements for width and slope. I live on perhaps the steepest section of Capitol Park Avenue and have witnessed many cars unfamiliar with the road slide out of control on slippery wintry streets as they descend. Likewise, on many occasions I have slid on snowy F street without being able to stop before sliding into 11th avenue. Fortunately the traffic levels are such that I have never been in an accident, but the roads in this area are not suited for higher traffic levels.

The location is not well served by public transit. Although there is a UTA bus stop nearby, the level of service is infrequent and impractical for most. Unlike other higher density developments in the city, the proposed development is not near any shopping areas with the nearest store, Smiths, being 7 steep blocks away. A foot trip from Smiths to Capitol Park Avenue bears more resemblance to a hike than a walk. In 17 years living on Capitol Park Avenue, no member of my household has walked to Smiths for groceries even though we are avid walkers. Adding additional housing units in the upper avenues will increase vehicle traffic in the city with all the concomitant negative environmental impacts.

I enjoy the recreational aspects of my neighborhood and frequently bicycle on 11th avenue. Although there is a dedicated bike lane there, I have had many near misses as unaware vehicle operators cut off the bike lane as they turn without yielding to bicycles. Increased development will add to traffic on 11th avenue and change the recreational aspect.

The proposed PUD plan calls for 22 foot wide streets and claims there will be capacity for on street parking within the PUD. When the CPHOA attempted to dedicate its private streets to the city, we were told that our streets were too narrow to allow for proper city services. CPHOA does not allow overnight parking on its streets. A 22 foot wide street combined with on street parking would not be adequate to service the proposed PUD.

When Ivory homes bought the lot, they were aware of the existing zoning. I feel they are trying to convince the planning commission that their plan would be a model to address housing shortages within Salt Lake City, whereas in reality it is a plan to increase their profits on the development. The homes they are proposing would cost around \$1 million and do very little to address affordable housing in the city.

Please vote to keep the zoning unchanged for this lot.

Sincerely,

Matthew Tyler
[354 Capitol Park Ave](#)

Echeverria, Daniel

From: Tyler Jack <[REDACTED]>
Sent: Wednesday, January 5, 2022 5:11 PM
To: Echeverria, Daniel
Cc: Paterson, Joel
Subject: RE: (EXTERNAL) setbacks question

I cannot attend the Zoom meeting but I wanted to shoot you one last note to remind you why I am against the re-zone. If you don't remember I live on the west side of the subject property and I do not want the re-zone simply because I'd like the set-backs to stay at 35 ft. I think the project will be nice but I just don't want another home less than 35 feet from my property line.

Thanks again for your consideration,



Tyler Jack

Manager - NMLS 132155

P: (801) [REDACTED] | F: (801) [REDACTED]

[REDACTED]
www.frontlinefinancial.com



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Echeverria, Daniel

From: JESSICA WILEY <[REDACTED]>
Sent: Monday, December 20, 2021 3:02 PM
To: Wharton, Chris; Echeverria, Daniel
Subject: (EXTERNAL) Opposition to Rezoning in Avenues

Hello,

I just wanted to write a short email stating that I have reviewed Ivory's revised proposal and remain opposed to the rezoning of 675 North F Street. Again, I am not opposed to developing the land, I am opposed to not following the current zoning for the neighborhood.

I also think it's pretty shitty that Ivory Homes keeps ignoring the voice of our neighborhood and try's to be sneaking with the timing of submitting their proposal right around the holidays.

Best,

Jessica Wiley

COMMENTS IN REGARD TO IVORY DEVELOPMENT PROPOSED PLANNED DEVELOPMENT AND SUBDIVISION APPLICATION FOR 675 NORTH F STREET

We are homeowners who reside at 415 E 12th Avenue, one block south of the development site. This is our fourth submission of comments regarding this project. Our previous submissions should be read as supplementing the following objections to the proposed Ivory Development ("Ivory") Capitol Park Cottages ("Project").

Unlike many requests for rezoning and planned development approval, Ivory admits in the Narrative portion of its submission that *"developing and building this property with multi-million-dollar homes would be easy for us..."* This is apparently intended to suggest that the entire surrounding area is composed of such homes and that such a development is within a recognized skill set of Ivory. **But what is important about that statement is that Ivory, which purchased the property with knowledge of its current zoning, is admitting that there is no condition of the site which makes compliance with current zoning a hardship for development.**

The rezoning, planned development treatment and other concessions sought by Ivory are to permit it to construct a vanity project which it has repeatedly described as *"a first of its kind in Utah plan"*. In its most recent submission to the City it states that it is *"an opportunity to do a demonstration project of sorts..."*. In an article that appeared in the December 26, 2021 issue of the Salt Lake Tribune Ivory's Chris Gamvroulas described this development concept as an *"experiment"* and admits that *"ADU's are kind of an untested market in Utah"*. **So, Ivory is asking the City to grant unneeded concessions for an untested, experimental development on a site that is the last undeveloped parcel in the Capitol Park Subdivision.** That subdivision has been developed over the last three decades by over 50 individual homeowners who have built their single family detached homes in reliance upon and in compliance with zoning guidance and restrictions established by the City. Ironically, while seeking to utilize the Capitol Park name and access to the private street that serves the subdivision, Ivory simultaneously seeks special exemption from the zoning and building standards that have guided the subdivision's development since its inception.

There's a principle that has guided health care professionals for centuries...FIRST DO NO HARM. Real property developers who seek to be *"first"* or to *"do a*

demonstration project of sorts”, and the City reviewers and decisionmakers who are being asked to approve such a project, should apply that principle by assuring that there is no harm created for others who have made significant housing decisions in reliance upon and in compliance with preexisting standards established by the City.

Ivory has resorted to name calling in lieu of addressing the issues raised by those of us who live in the Capitol Park Subdivision. We are accused of NIMBYism. However, name calling is the last resort of those who can’t address objective truths. The harms inherent in the Project are not only obvious to those of us who live in the Capitol Park Subdivision, but to those who live throughout the Greater Avenues area. **All three of the homeowner associations that represent adjacent developments have voted in opposition to the Project. The City has received a petition opposing the rezoning from 2,100 residents of the Avenues and in a referendum conducted by the Greater Avenues Community Council the rezoning was overwhelmingly opposed by a vote of 1,244 to 25. Most of the petition signers and those who voted in opposition to the rezoning live outside the immediate area of the Project itself.** So, opposition to the rezoning which is central to the Project is broad based. The specific harms that approval of the Project threatens are detailed in the numerous written objections that have been addressed to the City by us and many others.

But the greatest harm that this Project threatens is the loss of trust by the public in the decisions of our public institutions and government. Zoning approvals can’t be a mere popularity contest, but there are many reasons why this Project, if approved, will raise important questions as to the fidelity of the City to its own laws. **The City is pressured by a growing population that seeks affordable housing. In its search for answers to that challenge the City has been seeking to facilitate the creation of ADU’s, but the concept has not been shown to be popular among existing homeowners and the ADU ordinance does not permit anyone other than a natural person living on the property to create an ADU.**

Prior to the adoption of the most recent ADU ordinance, residents of the City were assured by ADU proponents that:

“it’s one unit at a time...It’s not a subdivision or an apartment complex of 200 units. [They] have little impact on actual neighborhoods and streets. They often blend in and are unnoticed”.

But this is actually what Ivory is proposing...a subdivision containing what could be called 14 potential ADUs (“PADUs”). The City’s ADU ordinance only permits the creation of ADUs by an “owner occupant” who “lives on the property within either the principal or accessory dwelling unit.” It defines “owner occupant” as “an individual who is listed on a recorded deed as an owner of the property; any person who is related by blood, marriage, adoption to an individual who is listed on a recorded deed as an owner of the property; or an individual who is a trustor of a family trust who possesses legal ownership of the property”. As a developer Ivory can’t create an ADU, so it is proposing to construct residential structures that could later have a portion of their interior space qualified as ADUs by individual purchasers of those residential structures once they take title. Only in that case would the PADUs be available to serve as rental units and create the additional residential units the City is seeking.

In the Narrative submitted by Ivory in support of the Project it engages in an exaggeration of what it is offering to the City. It uses the term ADU when in fact it is really offering PADUs. Here is its description of the Project’s meaning for the City:

The approval of Capitol Park Cottages would provide for a 22% increase in approved ADUs in Salt Lake City and would increase District 3’s approved ADU stock by 300%. When Capitol Park Cottages is constructed, its 14 ADUs will outpace the expected city-wide total of 13 new ADUs/year.”

Ivory is asking the City to let it build 14 PADUs and then hope that subsequent owner occupants will elect to qualify them as rental ADUs. Ironically, the current FR-3 zoning would ultimately permit the creation of 11 ADUs if so desired by purchasers of the 11 single family homes now permitted to be constructed on the site. Thus, 79% of the results outlined in Ivory’s Narrative could be realized without rezoning. But Ivory isn’t content with only securing City acceptance of this novel PADU concept, it is seeking two more concessions from the City. The first is rezoning of the site to SR-1 district status and the second is Planned Development treatment for the Project. The purpose of the

additional concessions is to permit a supersizing of the number of primary residences on the site. Each of these requests is without merit under the applicable ordinances of the City.

This is the provision from the ordinances of the City that explains the role of an SR-1 zoning 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....The standards for the district are intended...to preserve the existing character of the neighborhood”.

But Ivory isn't preserving anything and its proposed *“first of its kind in Utah's plan”*, and *“demonstration project of sorts”* is out of character with the other single family detached homes that have developed in the Capitol Park Subdivision over the last three decades in compliance with the FR-3 zone created by the City. The private street serving the Ivory property and the adjacent developed property to its west creates a common identity and interdependence that makes rezoning of the Ivory site to SR-1 status inappropriate.

Similarly, Ivory's plan for the Project does not meet the threshold requirements for Planned Development treatment under the City's Planned Development Ordinance. The Purpose Statement for Planned Development treatment of a proposed project lists several objectives meriting special treatment. Here's a portion of that Purpose Statement:

“A planned development will result in a more enhanced product than would be achievable through strict application of land use regulations, while enabling the development to be compatible with adjacent and nearby land developments. The City seeks to achieve at least one or any combination of the following objectives through the planned development process.”

However, Ivory fails to identify any feature of the site that makes strict compliance with land use regulations problematic. Nor does it cite any enhancement to the Project which is made possible by Planned Development treatment. In fact, in the Narrative Ivory describes the site as *“incredibly unique”* and a *“scarce opportunity”* because of the ease of its development.

In an effort to find a qualifying Planned Development objective Ivory appears to rely primarily on the “Housing” objective listed in the ordinance. The ordinance describes that objective as follows:

*“Housing: Providing **affordable** housing or **types of housing that helps achieve the City’s housing goals and policies**:*

- 1. At least twenty percent (20%) of the housing must be for those with incomes that are at or below eighty percent (80%) of the area median income.*
- 2. The proposal includes housing types that are not commonly found in the existing neighborhood but are of a scale that is typical to the neighborhood.”*

Ivory has provided no assurance of affordability for the residences in the Project and has not and cannot even assure that ultimate purchasers of residences in the Project will elect to submit a portion of their PADU equipped homes to actual ADU status. Moreover, the design of the proposed Project conflicts with the other objectives listed in the ordinance as qualifying a proposed project for Planned Development treatment. These include maintaining open space and natural lands, historic preservation, creating enhanced mobility and accessibility connections and sustaining natural systems. Ivory’s proposed plans for the site involve removing all trees, completely altering its natural terrain, constructing a complex system of large retaining walls, and covering the site so completely with hardscape development that a large storm water retention basin is needed.

Ivory is using the lure of 14 PADUs to secure City approval of a development plan that requires City acceptance of the risk that purchasers of principal residences containing the PADUs may not qualify them as ADU rental units. In exchange for that unknown outcome, Ivory is also seeking rezoning and an inappropriate use of the Planned Development approval process in order to supersize the Project. Meanwhile Ivory is marketing those PADUs as housing for large families and home offices. **Given the fact that there is a market demand for large single family homes containing home offices, few ADU rental units may actually be added to the housing stock of the City. That would mean that a supersized residential “demonstration project of sorts” will have been created which is completely out**

of character with the surrounding property and which fails to advance the affordable rental housing goals of the City. FIRST DO NO HARM.

Thomas W. Keen and Lynn A. Keen

Echeverria, Daniel

From: GENEVIEVE ATWOOD <[REDACTED]>
Sent: Sunday, January 23, 2022 12:30 PM
To: Echeverria, Daniel
Cc: Greater Avenues 2
Subject: (EXTERNAL) Thank you re GACC... Ivory Homes /Cottages. Clarity...

To David Echeverria

From Genevieve Atwood (resident 30 U Street, Lower Avenues)

Ivory Homes Capitol Park Cottages – The issue is the Foothills Master Plan... were we just kidding?

Thank you for your presence at the GACC meeting. I am aware the public comment has closed. I've thought about the multiple issues we discussed, and wondered: What is The Problem? Is it the fire trucks? The need for more housing or ... **Does the Foothill Master Plans mean anything?**

The Avenues foothills protection master plan was prepared in good faith and adopted by SLC after considerable effort. Were we just kidding? I don't think so. I hope the committee will see that as The Problem and stand by its master plan.

Thank you again for the work you do and your patience with all of us.

Genevieve

[REDACTED]

Echeverria, Daniel

From: Kathy Tenney <[REDACTED]>
Sent: Friday, January 14, 2022 8:39 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Development in the Avenues

Daniel,

I'm writing to share my continued opposition to Ivory's request to smash so many homes into a lot approved for 11, which could total 22 with accessory dwelling units. The approved dwellings for the lot will be stretching the road capacity as is. Doubling that number 33 dwellings, with their proposed plan, will make our roads unsafe. The private roads, Penny Parade and Capitol Park Ave., which the city refused to incorporate because they are too narrow and windy, will now have dozens more drivers speeding down its narrow, winding road with blind corners. In addition, F street, as we recently experienced, is so steep and tricky when it snows, that having so many additional cars slipping and sliding up that hill will create a parking lot of cars that have slipped into the curbs and into each other.

Please insist that Ivory Homes stay with the current zoning. Allowing more dwellings will endanger our children and grandchildren with added traffic. It will clog the main arteries of the Avenue's city owned streets as well.

I welcome having up to 22 new neighbor dwellings--if the current zoning for 11 dwellings includes accessory dwellings, and will adjust to the inevitable increase of traffic. But, please don't allow them to cram 33 dwellings into a lot approved for only 11!

Thank you for listening to the home owners, who will live with whatever decision is made for years to come. Ivory has no long term interest in the development, just a quick stop by for long enough to make some extra money, then slipping out, leaving the neighborhood with a burden to last a lifetime.

Kathy Tenney
346 E. Red Brick Ct.
Capital Park
[REDACTED]

Echeverria, Daniel

From: Cathy Walsh <[REDACTED]>
Sent: Thursday, January 13, 2022 10:07 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Avenues rezoning

Dear Daniel,

I am writing you to let you know that as a longtime Avenues resident (upwards of 44 years between renting and owning two homes and currently residing here), I am adamantly opposed to the Ivory Homes application to rezone the 675 North F Street property.

I feel very strongly that what Ivory Homes is proposing is way too dense for this area that cannot possibly support such a tremendous population load in such a small space. The streets aren't capable of supporting so much traffic and parking, not to mention the loss of greenspace and wildlife habitat. The increase in pollution, both in terms of air pollution and noise pollution from the increased traffic will be tremendous.

I recognize the need for increased housing, but really don't see this as the answer to it; rather just more and more luxurious, unaffordable and dense housing that is way out of reach financially to any but the most wealthy and yet another way to pad the pockets of an already wildly successful giant building corporation seeking to expand its maximum dollar.

I urge you to listen to the desires of the majority of the Avenues residents and deny this rezoning request of Ivory Homes for the good of our beautiful foothills.

Thank you for your consideration.

Most sincerely,
Cathy Walsh
365 N Virginia St
SLC, UT 84103

Echeverria, Daniel

From: Rose-Marie Walton <[REDACTED]>
Sent: Thursday, January 13, 2022 9:04 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Capitol Park Cottages

Dear Daniel Echeverria,

Thank you for the opportunity to express our feelings concerning the proposed zoning changes and development of Capitol Park Cottages. We believe that these changes would be detrimental to our community. The space is not adequate for the number of people you intend to house, nor is the parking. Additionally, adding that many cars to the street is unsafe, especially so near an elementary school. Please work within the current zoning laws to construct housing in our neighborhood, so that it will be safe and appropriate to the surrounding community.

Sincerely,

Mary Walton and Rosemarie Thomas

Echeverria, Daniel

From: carol ballou <[REDACTED]>
Sent: Thursday, January 13, 2022 6:04 PM
To: Echeverria, Daniel; Wharton, Chris
Subject: (EXTERNAL) Opposition to Ivory Homes Rezone Request

Dear Mr Echeverria and Mr. Wharton

Once again I am writing to express my strong opposition to Ivory Homes' request for a rezone of the property at 675 N F Street.

Ivory tries to present the idea that this zoning change is some sort of gift to the community but when the representative discusses the plans he calls it a "product" that they are experimenting with. The company can experiment with adding ADU's to their expensive homes without a zoning change.

Our property backs up to the development and I was dismayed to see that the new plan includes retaining walls and buildings right up to the property line. This was not expected when we bought our home a few years ago and will certainly decrease the quality of life in our home and decrease the value of our home. We bought with the good faith expectation that development would be single family homes with adequate space around each dwelling.

The current neighborhood does not benefit from this zoning change and the community is universally opposed to it. I read the public comments posted on line and, out of hundreds, saw only one in support and hundreds in opposition. This is consistent with the vote taken at the community council meeting last year where, again, the community displayed near unanimous opposition to this development. Concerns include fire fighter access, increased traffic, and the use of ADA's for short term rental.

After losing the attempt to develop the Cottonwood Mall area in a manner against the communities' wishes, Ivory Homes put in a systematic plan in order to undermine neighborhoods and force their plans. In a 2019 Tribune article an Ivory representative was quoted as saying, "We're not going to be surprised anymore, Parker said. We're just going to plan every time that someone is going to try and derail us and have a toolkit in place in case that happens." In Cottonwood this lead to a lengthy legal battle. In Cottonwood Heights that toolkit included sending false petitions through the neighborhood in order to undermine the community effort to oppose Ivory. In the Avenues it consists of repeatedly resubmitting plans and falsely framing the effort as for the good of the community. Please stop this by denying the rezoning and encouraging Ivory to build within the current zoning guidelines .

The Avenues community knows what feels safe, reasonable and in the best interest of the neighborhood. For a large, wealthy company to be able to use its resources to undermine the desire of the neighborhood is wrong. I feel that our elected representatives should be acting in accordance with the wishes of the people that they represent. Please vote no to the F Street rezone.

Carol Ballou
801 N Juniperpoint Drive
Salt Lake City, UT 84103

Echeverria, Daniel

From: Kim Hale <[REDACTED]>
Sent: Thursday, January 13, 2022 5:52 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Re-Zone

Daniel,
We appreciate you taking time to consider our concerns regarding the re-zoning of 675 North F Street.

The density of the Ivory proposed development is greater than any existing development in the vicinity. The area is simply too small for the units.

From that point on, it just intensifies...too small of an area equals:

- More cars using a road that can't & shouldn't handle that kind of traffic
- This foothills location lacks the infrastructure to support it
- Aesthetics of the neighborhood
- Minimal green space
- Loss of wildlife habitat

The list could go on. It seems that this is an unpredictable situation, one that has many unforeseen consequences down the road.

We respectfully ask for no zoning change, and reiterate that we are supporters of smart, planned development. We feel that re-zoning is not conducive to the environment.

Thank you for your consideration,

Mountain Seas Development
Po Box 680844
Park City, Utah 84068
[REDACTED]

Echeverria, Daniel

From: BILL PETERSON <[REDACTED]>
Sent: Thursday, January 13, 2022 5:23 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Capitol Park Proposal

Daniel Echeverria
Senior Planner
Salt Lake City Planning Department

Mr Echeverria:

I plead guilty for coming into this process late, I am sorry to submit this comment at the last moment.

I do not favor the development as proposed by Ivory Homes for the Capitol Park Cottages located at approximately 675 N F Street.

I am primarily concerned about density affecting the ambiance/character, and traffic/parking issues that accompany increased density. The area is of course zoned FR-3, which would allow 11 single family homes. All of the existing homeowners in that area bought their homes knowing that the land in question was zoned FR-3, and they have a right to expect that to be honored. While admittedly the Meridien At Capitol Park Condominiums are out of character, that should not be used as justification for further erosion of the FR-3 zone.

Further increasing the density impact is their proposed "accessory dwelling unit". While designing homes with "mother in-law" capability is a nice feature, it compounds the density issue, and would be appropriate at 11 homes, not 19.

The area in question is next to SR-1A, which does not include a 12,000 sq ft lot requirement. A quick look around at the blocks near the proposed site however, indicates that the character of that SR-1A is about 10-14 homes per block. The proposed 19 homes is a significant increase in density, and does not, "maintain the unique character of older predominantly single-family and two-family dwelling neighborhoods that display a variety of yards, lot sizes...." The placement of 19 closely spaced homes as proposed would be inappropriate even for that particular SR-1A.

I am also concerned about the additional requests they apparently are making. I assume this may be relief for requirements regarding wall height, setbacks etc. That lot is quite flat and open, and while relief for those sorts of things is appropriate for unusual lots, such as sloped or odd sized lots, I see no reason for relief in this case. Those requirements are there to protect the look and ambiance of the area, and unless necessary, relief is not appropriate.

Ivory Homes has put forth a nice looking proposal, however I can't help but think they could have done a much better job by attempting to fit into the zoning requirements already in place. I think a better solution exists, maybe not one that provides the same profit for Ivory Homes, but one that would be better for the community as a whole.

Sincerely,

Bill Peterson
986 E 1st Avenue
SLC, 84103
[REDACTED]

Echeverria, Daniel

From: Lung, Kathleen <[REDACTED]>
Sent: Thursday, January 13, 2022 5:00 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Zoning Application - Petition Numbers: PLNPCM2020-00334/00335, PLNPCM2021-00656, PLNSUB2021-01175

Attn: Mr. Daniel Echeverria
Re: IVORY HOMES APPLICATION TO REZONE 675 NORTH F STREET (Parcel Number 09304550210000)
Salt Lake City Government Offices
Planning Department
[REDACTED]

Dear Mr. Echeverria,

As a 23 year resident of The Avenues neighborhood, I see significant issues with the Ivory homes applicant narrative and plan as presented in their request to change the zoning of 675 F Street from Foothills Residential (currently FR-3) to SR-1 as a Planned Development. I have had the opportunity to live many places in the world and, with opportunities to live elsewhere, remained in the Avenues area because of the very essence of what the current Avenues Master Plan supports. Its stated goal is to "direct future growth and development so that quality of lifestyle and community scale are maintained." I treasure this community and am compelled to argue against Ivory Homes' zoning request.

The current zoning of this parcel of FR-3 is consistent with the goals of the Avenues Master Plan and, like the repurposing of the VA hospital into a low density condominium building, had broad community support. In very stark contrast, the Ivory request to re-zone this land as a Planned Development is an experiment that creates a unique instance of development in which all of the cottages will get an ADU. The existing ADUs in the Avenues are isolated and do not significantly increase visual density in a neighborhood. The density in this proposal even requires significant retaining walls that further increase the visual impact of this density. Finally, it degrades available greenspace and has hijacked zoning targeting denser use in order to maximize the value of the land to Ivory Homes itself. It does this in conflict with numerous explicitly stated goals in the Avenues Master Plan and without respect for this neighborhood or community support.

Building within the current density limits of FR-3 with the additional ADUs *would be* an increase in density, it *would be* aligned with the Growing SLC Five Year Plan, and is *broadly supported* by the Greater Avenues Community Council.

For the above stated reasons, I strongly object to the request for rezoning this property.

Respectfully,
Kathleen Lung
847 N Juniperpoint Dr
Salt Lake City, UT 84103



Echeverria, Daniel

From: Kimmel, Austin
Sent: Thursday, January 13, 2022 4:41 PM
To: Echeverria, Daniel
Cc: Norris, Nick; Tarbet, Nick; City Council Liaisons
Subject: FW: (EXTERNAL) No Ivory Homes RE-Aone / D3

Good afternoon Daniel,

I noticed your email address is misspelled in this email. I wanted to make sure you received this comment.

Thank you,

Austin Kimmel
Salt Lake City Council Staff
he/him/his

OFFICE *of the* CITY COUNCIL
SALT LAKE CITY CORPORATION

TEL [REDACTED]

SLCCOUNCIL.COM

To assure proper attention to your email, please 'Reply to All' or include [REDACTED] on the address line of this email.

-----Original Message-----

From: Liz Owens <[REDACTED]>
Sent: Wednesday, January 12, 2022 9:48 PM
To: [REDACTED]
Cc: Wharton, Chris <[REDACTED]>
Subject: (EXTERNAL) No Ivory Homes RE-Aone

Dear Mr Echeverria,

I am a resident at 623 G Street, just a short walk from the proposed over-development of 675 No. F Street.

I sent a letter nearly 2 years ago opposing the attempt by Ivory to over develop this plot of land and feel even stronger about this issue now. It appears that in Ivory's 3rd application the developer is asking for more land development and more dwellings. I find this request to be most arrogant and extremely dismissive of the Avenues Community and the Avenues Master Plan.. The Majority of Residents living in the Avenues does not want this. Over 2,100 Avenues Residents signed a petition opposing this rezone and over 200 letters have been written and sent to you opposing this over development. This attempt by Ivory to persuade the planning commission to relax Avenues Zoning is astonishing. The developer wants a rezone from FR-3 to SR-1 allowing additional lots. They want to add at least 14 Accessory Dwelling Units to these newly created lots for a total of 33 dwellings. They are applying for non conforming lot size, setbacks, and lot building coverage. All of these requests, if granted by the Planning Commission will result in the

undoing of The Avenues Master Plan and will destroy the preservation of our beloved Avenues neighborhood. It is too many buildings on a small area of property, creating an overly dense population in this small neighborhood. .

I have looked at Ivory's plan and there is Absolutely nothing about it that reflects the historical nature of the Avenues. It is overly dense, and unsightly, with ugly retaining walls, very little green space, and inadequate parking, just to name a few of the problems with the development.

This area is part of the cities' beloved foothills and a place for our wildlife to flourish.. We bought our home here 28 years ago so we could enjoy the wildlife and the quaint and delightful neighborhood it is. We have been very happy here..

I respectfully ask you to deny this inappropriate re zoning application from Ivory Homes.

Sincerely,

Elizabeth Owens

Anne Palmer
640 K ST
Salt Lake City, UT 84103
[REDACTED]

Dear Mr. Echeverria,

I am responding once again to Ivory Homes' application to rezone 675 North F Street. This is the third application submitted by Ivory and it adds a planned development to the expanding list of exceptions to the current status of this lot requested of the city:

1. Rezone from FR-3 to SR-1.
2. Utilization of discredited SR-1 zone that was deliberately eliminated from The Avenues when it was replaced with SR-1A, which reduces the bulk and size of buildings.
3. Change in the Avenues Community Master Plan to allow a denser development than permitted.
4. Construction of Accessory Dwelling Units (ADUs) connected to every one of the 14 cottages in their enclave, doubling the number of households. The five custom homes on F Street could also have ADUs. The unintended consequences of such a cluster of ADUs is as yet unknown.
5. Request for a Planned Development (PD). A PD effectively allows Ivory to circumvent many of the rules for SR-1, such as lot sizes and setbacks, so that they can squeeze their development onto the plot. For example, not one of the lots has the required rear setback for SR-1. Six of the 14 cottage lots are less than the required 5000 square feet. But if the PD is approved, all of this is allowed.

As a single mother who also cares for my 87 year old mother in our family-owned duplex, I am concerned about the substantial increase in the number of buildings on the land to be developed by Ivory Homes, accompanied by street traffic. The density is not in character with the surrounding neighborhood. There must be more affordable options for increasing the amount of housing available in Salt Lake City. I should think approving this rezoning and the ill-fitting design would be an embarrassment to our city leaders.

We ask for a denial of this request and adherence to the Avenues Master Plan.

Best regards,

Anne E. Palmer

Echeverria, Daniel

From: Mark Levitt <[REDACTED]>
Sent: Thursday, January 13, 2022 4:10 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Zoning Application - Petition Numbers: PLNPCM2020-00334/00335, PLNPCM2021-00656, PLNSUB2021-01175

Attn: Mr. Daniel Echeverria
Re: IVORY HOMES APPLICATION TO REZONE 675 NORTH F STREET (Parcel Number 09304550210000)
Salt Lake City Government Offices
Planning Department
[REDACTED]

Dear Mr. Echeverria,

As a 25 year resident of The Avenues neighborhood, I see significant issues with the Ivory homes applicant narrative and plan as presented in their request to change the zoning of 675 F Street from Foothills Residential (currently FR-3) to SR-1 as a Planned Development. I have had the opportunity to live many places in the world and, with opportunities to live elsewhere, remained in the Avenues area because of the very essence of what the current Avenues Master Plan supports. Its stated goal is to "direct future growth and development so that quality of lifestyle and community scale are maintained." I treasure this community and am compelled to argue against Ivory Homes' zoning request.

The current Avenues Master Plan states very clearly that the Primary Children's Hospital and BYU Education Center buildings would not have been approved were they to be built then as:

[t]hese properties are on the fringe of a low-density residential community. Access to theses 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.

The updated Ivory narrative argues that the existing zoning (FR-3) is inappropriate for the referenced lot (675 F St). Ivory argues that the repurposed VA hospital into The Meridien condominiums (across the street from said lot) is the "most dense zoning island in the area" and that that justifies their case for density without acknowledging the differences between an existing vertical structure and the horizontal development requested. The density they refer to in The Meridien is effectively 'households per square foot' while in actuality Ivory wants to create 'houses per square foot'. Ivory Homes has created a strawman argument - the use of The Meridien or Northpoint Estates to justify the rezoning of 675 F St is actually inapplicable. Additionally, the Meridien is a high-end luxury usage of that land that has in fact also maintained significant greenspace. In contrast, the

rezoning request by Ivory would create an island of high density horizontal development, with their current plans resulting in dramatically less greenspace than would exist in the current FR-3 zoning. This request for zoning change is the exact opposite of the planning goal stated in the Avenues Master Plan "Foothill Development And Protection":

Planning Goal: 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. (emphasis added)

The current zoning of this parcel of FR-3 is consistent with the goals of the Avenues Master Plan and, like the repurposing of the VA hospital into a low density condominium building, had broad community support. In very stark contrast, the Ivory request to re-zone this land as a Planned Development is an experiment that creates a unique instance of development in which all of the cottages gets an ADU. The existing building of ADUs in the Avenues are isolated and do not significantly increase visual density in a neighborhood. The density in this proposal even requires significant retaining walls that further increase the visual impact of this density. Finally, it degrades available greenspace and has hijacked zoning targeting denser use in order to maximize the value of the land to Ivory Homes itself. It does this in conflict with numerous explicitly stated goals in the Avenues Master Plan and without respect for this neighborhood or community support.

Building within the current density limits of FR-3 with the additional ADUs *would be* an increase in density, it *would be* aligned with the Growing SLC Five Year Plan, and is *broadly supported* by the Greater Avenues Community Council.

For the above stated reasons, I strongly object to the request for rezoning this property.

Respectfully,
Mark Levitt
847 N Juniperpoint Dr
Salt Lake City, UT 84103
[REDACTED]

Echeverria, Daniel

From: Brent Davis <[REDACTED]>
Sent: Thursday, January 13, 2022 3:24 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Fwd: NO Ivory Homes Re-zoning in the AVENUES!

Daniel,

This email from Julie Campbell is being forwarded to you because it was meant for you.

She lives at the SEC of F street and 11th.

Thanks,

Brent Davis

Begin forwarded message:

From: Julie Campbell <[REDACTED]>
Subject: Re: NO Ivory Homes Re-zoning in the AVENUES!
Date: January 13, 2022 at 3:15:00 PM MST
To: Brent Davis <[REDACTED]>
Cc: [REDACTED] [REDACTED] [REDACTED]

Sent from my iPhone

On Jan 13, 2022,

Daniel and others to whom it may

This is Julie Campbell
452 east 11 th Avenue

. We want you to know that we are very much opposed to the rezoning for Ivory Homes.

It is too dense for the Ivory Homes site and this avenue area. It will add too many cars coming down an already busy "F" street, running the STOP sign and turning onto an even busier 11th Ave.

We oppose a plan to virtually have no yards and green space. This does not fit the current character of the established avenue neighborhood.

We want to go on record that we want you to turn down the Ivory Homes re-zoning request.

Thank you,

Julie Campbell

[REDACTED]

Brent Davis

[REDACTED]

www.MyUtahHomesForSale.com

Select Group Realty

By the way, I am never too busy for your referrals.

Echeverria, Daniel

From: Julie Campbell <[REDACTED]>
Sent: Thursday, January 13, 2022 3:15 PM
To: Brent Davis
Cc: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Re: NO Ivory Homes Re-zoning in the AVENUES!

Sent from my iPhone

On Jan 13, 2022,

Daniel and others to whom it may

This is Julie Campbell
452 east 11 th Avenue

. We want you to know that we are very much **opposed** to the rezoning for Ivory Homes.

It is too dense for the Ivory Homes site and this avenue area. It will add too many cars coming down an already busy "F" street, running the STOP sign and turning onto an even busier 11th Ave.

We oppose a plan to virtually have no yards and green space. This does not fit the current character of the established avenue neighborhood.

We want to go on record that we want you to turn down the Ivory Homes re-zoning request.

Thank you,

Julie Campbell
[REDACTED]

January 13, 2022

To:

Daniel Echeverria, Senior Planner, Planning Division
Chris Wharton, District 3 Council Member and City Council Chair

Opposition to Ivory Homes Amended & Supplemented Rezoning Application for 675 North F Street
Petition Number: PLNPCM2020-00334/00335, PLNPCM2021-00656, PLNSUB2021-01175
<https://www.slc.gov/planning/2021/11/29/capitol-park-cottages/>

I have lived at 790 Northpoint Drive for 21 years.
My home is *directly* across from the 675 North F Street Rezoning application.

I very adamantly oppose the rezoning of 675 N. F Street property from FR-3/12,000 to SR-1 or any other zone other than the existing zoning.

I recommend Ivory Homes develop their “new-build, in-fill, planned community that incorporates Accessory Dwelling Units” under the current foothills zoning goals.

Any zoning change will result in an overly dense and possibly a high elevation development. No zoning change is needed to develop. The existing zoning adequately allows for ADUs while also limiting over-dense construction.

This amended plan contains misrepresentations, for example transportation:

- Automobiles will be required for each unit. Bus transportation cited on Appendix F, cites a bus route that is only available Monday-Friday, during the day to early evening. Evenings, weekend and holiday transportation is not available by bus.
- RM-35 zoning for Meridian is a special consideration to restore an historic building and so is not comparable to this new development.

The traffic evaluation is suspect as it was funded by the developer and as well was conducted during the COVID pandemic so vastly underestimates traffic and is possibly ‘directed’ by the payer, i.e. Ivory Homes.

This additional amended concept does not represent a substantial difference in creating a development consistent with the existing foothills neighborhood density; nor does it commit to a specific build density.

As a resident and very concerned citizen, I urge you to oppose the Ivory Homes rezoning proposal for 675 North F Street. It is deleterious to my home and community.

I look forward to your continued support in this matter.

M Lisa Larriva, directly adjacent resident

790 Northpoint Drive
Salt Lake City, UT 84103

[REDACTED]
[REDACTED]

Echeverria, Daniel

From: Brent Davis <[REDACTED]>
Sent: Thursday, January 13, 2022 3:04 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) NO Ivory Homes Re-zoning in the AVENUES!

Daniel and others to whom it may concern:

This is Jane and Brent Davis living at 468 11th Ave (just East of F street). We want you to know that we are very much **opposed** to the rezoning for Ivory Homes.

It is too dense for the Ivory Homes site and this avenue area. It will add too many cars coming down an already busy "F" street, running the STOP sign and turning onto an even busier 11th Ave.

We oppose a plan to virtually have no yards and green space. This does not fit the current character of the established avenue neighborhood.

We want to go on record that we want you to turn down the Ivory Homes re-zoning request.

Thank you,

Brent & Jane Davis

Brent Davis



www.MyUtahHomesForSale.com

Select Group Realty

By the way, I am never too busy for your referrals.

Echeverria, Daniel

From: elmore <[REDACTED]>
Sent: Thursday, January 13, 2022 2:24 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) No Ivory Homes Re-zone in the Avenues

Daniel,

Thank you for your comprehensive presentation at the recent Avenues meeting.

I am against the request by Ivory Homes to Re-zone the property at 675 North F Street. The goal of the developer is to increase their profits.

As a long time citizen of the Avenues, I object to Ivory Homes wanting to change the housing density in the neighborhood, which will change the character of the neighborhood and the surrounding streets, as traffic increases.

Let's not make a developer set precedents for re-zoning in the Historical Avenues as the company seeks larger profits.

Susan Elmore
466 4th Ave, SLC UT 84103

suzi elmore
[REDACTED]



IVORY HOMES

TOO MANY HOMES – NO RE-Z

Contact the City Council by Janua

Echeverria, Daniel

From: Pamela King <[REDACTED]>
Sent: Thursday, January 13, 2022 1:53 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) No Ivory Homes

Dear Mr. Echeverria,
I live at 569 H St, Salt Lake City, UT 84103. Please count me as strongly opposed to the Ivory homes development.
Thank you,
Pamela King

Echeverria, Daniel

From: [REDACTED]
Sent: Thursday, January 13, 2022 12:51 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Homes Rezone - Capitol Park Cottages

Attention to:
Daniel Echeverria, Senior Planner, SLC Planning Division
Chris Wharton District 3 Salt Lake City Council
POAZ Coalition

Subject: NO Ivory Homes Rezone - Capitol Park Cottages on 675 North F Street

This email is to express my disapproval of the rezoning project by Ivory Homes. I, avenues owner and resident, respectfully ask the members of the Planning Commission and all involved in this process to recommend against this project. NO Ivory Homes Rezone - Capitol Park Cottages on 675 North F Street, in SLC, Utah.

The Avenues is a unique neighborhood and can't handle projects of this magnitude. There is no infrastructure to support these projects and too many risks for the residents, including compromised air quality and roads deterioration with increased traffic.

Thank you in advance,

Lena Butler
460 E 10th Ave., S.L.C.

Echeverria, Daniel

From: Patrick Froehling <[REDACTED]>
Sent: Thursday, January 13, 2022 9:23 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; Virginia; [REDACTED]
Subject: (EXTERNAL) feedback - 675 N F Street re-zone request from Ivory Homes

Dear Mr. Echeverria,

We are writing once again to voice our opposition to the requested rezone in the Avenues (675 N F Street) by Ivory Homes. We are longtime residents of 638 N H Street, just two blocks away from this parcel. We often walk in our neighborhood, and we walk past this parcel at least once every week. One of the best qualities of our neighborhood is the many people you will see walking, jogging, biking, and enjoying the outdoors. While 11th Avenue is busy with traffic, the preponderance of single family homes helps keep traffic and noise manageable. It is a good balance.

We strongly oppose the proposed rezone, even with the new changes made by Ivory Homes. This parcel is nestled into a corner of our neighborhood, and there are only 2 or 3 narrow streets as ways to go in and out. The amount of new traffic this proposed development would create would be dangerous to everyone enjoying the outdoors, not to mention the disruption to quality of life from the extra noise. The main outlet of F Street goes up and down the hill. Speed, line-of-sight challenges, and lack of sidewalk coverage would make a large increase of vehicles here highly dangerous. It would be a blight on this unique and historic neighborhood, and it is completely inconsistent with the Avenues Master Plan. This is not the place for experimentation to address a housing crisis. The consequence for us after decades of living here and paying property taxes: We would never be able to safely walk in this part of our neighborhood ever again.

Ivory Homes has claimed that the rezoning should be acceptable because there are already some higher density parcels close-by. This is actually an argument NOT to increase this density further. The only reason there is a five-story condo next door is because it was an existing historic structure. Had it been anything else it would not have been allowed. This development needs to stay zoned at FR-3. The surrounding streets cannot handle such a large increase in density of housing without destroying the plan of the neighborhood and creating dangerous traffic for existing residents.

Thank you for hearing our comments.

Best Regards,

Patrick Froehling & Virginia Walker

638 N H Street
[REDACTED]

Echeverria, Daniel

From: Heather McLaughlin-Kolb <[REDACTED]>
Sent: Wednesday, January 12, 2022 10:27 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) NO Ivory Homes Re-Zone

Daniel et al,

Please consider this email in opposition to the Ivory Homes rezone application for 675 F Street, Salt Lake City, UT 84103.

I am sure you have received numerous emails regarding this topic and therefore I'll keep my email to the point.

Contrary to [Appendix F: Public Transportation Proximity and Frequency](#), the Utah Transit Authority (UTA) no longer services the upper Avenues neighborhoods.

Currently UTA provides bus routes 6 and Flex 11. The closest designated bus stops are located at 9th Avenue and C Street (both routes) and 6th Avenue and F Street (Flex 11 route only). Bus Route 6 provides 30- and 60-minute headways, while Flex Route 11 provides 60-minute headways on weekdays only. Considering that neither of these bus stops are within one-quarter mile of the property, this greatly decreases the likelihood that future residents will utilize transit.

The proposed Ivory Homes rezone application does not address the affordable housing crisis that we are currently experiencing along the Wasatch Front. [Appendix H: Growing SLC: A Five-Year Housing Plan 2018-2022](#) defines affordable housing, and these homes do not meet the requirements of affordable housing.

"Affordable housing for a single person in Salt Lake City currently earning 60% AMI, or \$41,350, would be a rental costing approximately \$1,034/month, or a home priced around \$175,000 (est. mortgage \$824/mo + taxes and insurance). Affordable housing for a Salt Lake City family of four earning 80% AMI, or \$59,050, would be a rental costing about \$1,476/month or a home priced around \$265,000 (est. mortgage \$1,193/month + taxes and insurance)."

Thank you for the opportunity to provide comments. I appreciate your time.

Sincerely,
Heather McLaughlin-Kolb
695 G Street
Salt Lake City, UT 84103

Echeverria, Daniel

From: Jenny <[REDACTED]>
Sent: Wednesday, January 12, 2022 9:46 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Avenues Rezone

Hello,

My name is Jenny Merkley and I live at 672 G Street, SLC UT 84103.

There are a number of reasons I strongly oppose the Ivory Homes request to rezone the open space area at the top of F street from FR-3 to SR-1.

I am most concerned about the public safety issues that the increased density will affect, given the concerns from the local fire and police departments. Second, I worry about the environmental impact (on local wildlife, the proximity to open space) of the increased density.

I have a young family and I walk past the trees the Red-tailed hawks nest in often with my 7 year old son. It's a wonderful site to see them flying to and from their nest. I told my son recently that the trees might be cut down if the rezone is approved. He became very upset and said how can we protest that. So here's one way for me to protest.

Lastly, the increased density is completely and utterly out of character for the community. Other than financial gain for Ivory Homes, the rezone makes no sense on many levels.

I do not oppose properly zoned development. I do oppose Ivory Homes request to improperly increase the density of the area.

Thank you for your attention,

Jenny

Echeverria, Daniel

From: Lena Morgado <[REDACTED]>
Sent: Wednesday, January 12, 2022 8:42 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) No Ivory Homes Re-zone

Dear Sirs,

I reside at 460 10th Avenue, Salt Lake City, Ut 84103. I vote NO to the proposed 2 applications by Ivory Homes Rezone - Capitol Park Cottages on 675 North F Street, in SLC.

This is not sustainable. There are serious concerns about air quality, traffic, sewer, electric power, water, public transportation, stores/grocery shopping, and a potential increase in violence. The Avenues can't handle such a large project. Please listen to the residents: NO Ivory Homes Re-Zone.

Thank you,
Elena DaSilva
Avenues Resident

Echeverria, Daniel

From: Ann Hanniball <[REDACTED]>
Sent: Wednesday, January 12, 2022 8:41 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Re-Zone Application

Dear Mr. Echeverria:

I am writing to once again voice my opposition to Ivory Homes' application for a zoning change to support a high density project it proposes at the intersection of F Street and 13th Avenue. In addition to requiring a zoning change, the project is inconsistent with the Avenues Master Plan -and is almost unanimously opposed by Avenues residents for reasons cogently outlined on a number of occasions and in a variety of formats.

I am a long-time resident of the Avenues and deeply appreciate this wonderful neighborhood community, which has been well served by its zoning and Master Plan. Thank you very much for considering my opinion.

Sincerely,

Ann Hanniball
74 S Street
SLC 84103.

January 12, 2022

To Whom it May Concern,

This letter is written in opposition to the re-zoning application placed by Ivory Homes for 675 N F Street. I have been a resident of the avenues for over 20 years and am currently residing at 626 F street, which is across the street from the proposed location for re-zoning. I am in strong opposition to the changes in zoning requested by Ivory homes.

Accessibility and available community resources are my main concerns as these are extremely important when considering high density housing as this rezone would allow. The lot in question is at the top of F street with no outlet and only one main access point. The increase in housing density and cars that would result from rezoning would increase traffic and congestion an unacceptable amount for current residents. The only public transportation nearby is bus F11 offered by UTA. As a rider of this bus route, I know first hand of the limitations as it only comes once per hour, has small capacity, and is not available on weekends. It is not an adequate transportation solution to support high density housing. Anyone familiar with the upper avenues is aware that there are limited resources that are very close by or walkable. Smith's on 6th avenue is the only store available and is already constantly crowded and busy. It cannot be relied upon to support additional residents from a high density housing development.

In addition to the logistical concerns of high density housing in the Avenues, I also feel strongly that the development Ivory Homes is proposing is grossly out of character. The avenues is a historic neighborhood that should be preserved and any new development should be congruous with the existing zoning rules and regulations as has been the case for many years. I know that Salt Lake City is facing a housing shortage that needs to be mitigated, but this is an inappropriate location for high density housing. I hope that the Salt Lake City Council will respect the wishes of current Avenues residents and reject the bid for rezoning.

Sincerely,

Erica Farr

Echeverria, Daniel

From: Matt <[REDACTED]>
Sent: Wednesday, January 12, 2022 8:37 PM
To: Wharton, Chris
Cc: Echeverria, Daniel
Subject: (EXTERNAL) To whom it may concern, I strongly oppose the Ivory Homes request to rezone the open space area at the top of F street from FR-3 to SR-1. For all the reasons stated by the POAZ coalition, I oppose this request. I do not oppose properly zon...

1316 E 600 N,
[REDACTED]

Echeverria, Daniel

From: Joel Pittman <[REDACTED]>
Sent: Wednesday, January 12, 2022 8:25 PM
To: Wharton, Chris; Echeverria, Daniel; [REDACTED]
Subject: (EXTERNAL) Ivory Homes rezoning

Hello,

My name is Joel Pittman and I live at 672 G Street, SLC UT 84103.

For several reasons, I strongly oppose the Ivory Homes request to rezone the open space area at the top of F street from FR-3 to SR-1.

Primarily, I am concerned about the public safety issues that the increased density will affect, given the concerns from the local fire and police departments. Second, I worry about the environmental impact (on local wildlife, the proximity to open space) of the increased density. Lastly, the increased density is completely and utterly out of character for the community. Other than financial gain for Ivory Homes, the rezone makes no sense on many levels.

I do not oppose properly zoned development. I do oppose Ivory Homes request to improperly increase the density of the area.

Thank you for your attention,

Joel

Echeverria, Daniel

From: [REDACTED]
Sent: Wednesday, January 12, 2022 7:59 PM
To: Echeverria, Daniel
Cc: Mayor; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Opposition to Ivory's Request for Planned Development at Capitol Park

Daniel,

As a landscape architect, I serve on architectural review committees for two private residential neighborhoods, North Cove and Dorchester Pointe, for which I review site and architectural plans for compliance with development CC&Rs and SLC zoning regulations. For these foothills properties my comments often address issues of grading, drainage, and retaining. It is through this lens that I reviewed Ivory Homes plans for 675 North F Street and find them highly problematic.

The fact that the plans are out of compliance with SR-1 zone regulation in so many areas, including lot size, lot width, yard setbacks, building coverage, and garage orientation, suggests to me that Ivory is looking for maximum density and profit rather than designing a project to fit on a specific site.

The fact that the plans require such extensive site grading and retaining modifications confirms that the site plan was not designed to fit this site but rather is an attempt to force a preconceived plan layout, suitable for flat land, on a site that slopes 50-feet diagonally across the property. While the five custom homes on F Street work acceptably well - stepping with the slope not unlike homes directly across the street from them - the interior multi-gen and cottage units are forced onto the site in a convoluted plan with non-compliant setbacks and inadequate space between units for privacy or grade transitions.

The mirrored arrangement of the multi-gen units 8-9, 13-14, 15-16 and 18-19 force the site to be carved into large flat terraces separated by tall walls, and units 13-16 run lengthwise "against the grain" of the slope rather than with the hillside, requiring retaining walls of excessive height at the rear of the property. This is very different from the typical Avenues treatment of slope where homes align parallel to and step with the topography.

With the exception of topographic grading contours and spot elevations at the interior roadway and sidewalk, grading information included in Ivory's plans is misleading or wrong, and this absence of accurate topographic information hides the extent of retaining that actually will be required in the installation. Most proposed topographic grade lines on sheet O-4 are a sham, showing the back corner of unit 12 buried under 10 feet of soil or showing a drop of 8 feet from the end of the roadway to the garage of unit 11, only 20 feet away. Obviously, neither of these conditions shown in Ivory's grading plan can occur, but they indicate sloppy and incomplete design which should have been identified and corrected in review.

Ever since Ivory filed their original application requiring a rezone to FB-UN1, their design has been searching for exemptions and loopholes, and they are requesting a Planned Development (PD) in order to circumvent SR-1 regulations. Salt Lake City's PD application instructions clearly state that PD is "not intended to be a means to simply obtain variances from zoning regulations" and "should result in a more enhanced product than would be achievable through the strict application of land use regulations . . ." Planned Developments are supposed to be granted for specific reasons and in the service of specific objectives, which Ivory's current application does not satisfy. Most troubling about Ivory's request for a Planned Development and attendant code exemptions would be that the City, if granted, would be rewarding Ivory for bad design.

If Ivory is granted a rezone to SR-1, their plans should meet the zone's requirements in all respects. This can easily be done by reducing the number of units so that each meets zone regulations for lot size and width, setbacks, and building coverage. Units should then be redesigned to meet SR-1 regulations for building height and standards for attached garages, and arranged on the site in a manner that would reduce grading impacts and retaining wall heights and extent. These site plan modifications would help the development match the scale and intensity of adjacent neighborhoods and preserve the existing character of the Avenues.

For the above reasons, I respectfully request the Planning Department recommend against Ivory's request for a Planned Development and rigorously enforce compliance with SR-1 zone requirements. That, in the long term, is in the best interest of Salt Lake City.

Thank you,
James Bach
655 North H Street

Echeverria, Daniel

From: Lori Passey <[REDACTED]>
Sent: Wednesday, January 12, 2022 7:12 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Opposition to Re-zone 675 North F Street

Dear Mr. Echeverria,

I am writing to register my opposition to the Ivory Home's proposed rezoning of 675 North F Street (the rezone from FR-3 to SR-1) in Salt Lake City. There are several reasons to oppose this rezone, but I would like to address just a few. Firstly, if Ivory is allowed to proceed, the area will be too densely populated with inadequate infrastructure, including roads and parking. Secondly, there will be decimation of wildlife habitat due to the overcrowding and removal of the mature trees on the site. And thirdly, rezoning would violate the good faith that community members expected when choosing to live in this neighborhood. It would drastically change the overall aesthetics of the avenues area, an important consideration for residents.

Thousands of residents oppose this rezone, and I respectfully request that you listen to and support those who will be most affected.

Thank you for your time and consideration.

Sincerely,

Lori Passey
800 North Juniperpoint Drive

Echeverria, Daniel

From: Kevin Havlik <[REDACTED]>
Sent: Wednesday, January 12, 2022 6:50 PM
To: Echeverria, Daniel; Wharton, Chris
Cc: carol Ballou
Subject: (EXTERNAL) OPPOSITION TO IVORY HOMES REQUEST FOR REZONE

Dear Mr. Echeverria and Mr. Wharton,

Once again I am writing to express my strong opposition to Ivory Homes Request for a rezone of the property at 675 N F Street.

Ivory couches their request in noble terms - they stated at the recent Community Council meeting (which you both attended) that they wish to demonstrate that having ADUs makes housing affordable - the ADU itself would be affordable for the parties living there, and having an ADU would help pay the mortgage for their expensive houses, thus making it more affordable to live in an expensive Ivory home.

If they want to demonstrate that, they don't need a rezone to do so. They can demonstrate this with the 11 houses for which the property is currently zoned. They don't need to add additional homes to show that ADU's may or may not be a good idea, and so no rezone is needed..

The neighborhood is universally opposed to the proposed rezone.

Taking a relatively small property like this and crowding it with houses and ADUs beyond what current zoning allows, doesn't solve any problems for Salt Lake City. It is too small a property to make any kind of dent in the housing crisis, and despite what Ivory would like one to believe these houses are not affordable housing, even with income from ADUs. Ivory Homes may benefit by crowding in more houses, they will make more money when they sell them, but the city does not benefit, the neighborhood does not benefit, the homeless and those who can't afford housing do not benefit. There is not adequate infrastructure to support the number of homes they wish to crowd onto this parcel of land. There is no good public transportation, and this will greatly increase traffic on steep hills and in neighborhoods with children. Their proposed development is incongruent with the surrounding neighborhood and it will forever be incongruent, long after Ivory Homes has cashed in and moved on to some other development project.

This was zoned as FR-3 for a good reason. If zoning is changed solely because a developer wishes to make a financial killing, there it would seem there is no reason even to have zoning laws.

Throughout this process Ivory has made misleading statements about the amount of infrastructure that currently exists, about the housing density in their proposed development, and about the number of units required to demonstrate what they want with ADU's.

I strongly urge the Planning Commission and the City Council to deny this request for a rezone of this property. Current zoning has been fine for years, and it is fine now for everyone except Ivory Homes' bank account.

Respectfully,

Kevin L. Havlik MD
801 N. Juniperpoint Dr.
Salt Lake City, UT 84103

Echeverria, Daniel

From: Cynthia Conner <[REDACTED]>
Sent: Wednesday, January 12, 2022 6:30 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Homes Application to Rezone 675 N F St

Dear Daniel and Chris,

As someone who has lived and been active in the Avenues and Capitol Hill area for over 30 years I write to you to voice my strong opposition to the Ivory Homes request to rezone the empty lot off of F Street. There is nothing in their request that compliments or adds to the Greater Avenues area and their small homes squeezed into the lot on F Street will be a detriment to the neighborhood. The Avenues is unique with homes with yards and trees and a sense of space. The area Ivory Homes wants to develop is not near adequate public transportation so homeowners must drive and the area is already beyond capacity. Have you ever tried to go to Smith's on E Street in the afternoon? There is no parking! Have you tried to drive down E or I Street in the morning? Cars are backed up several blocks waiting to get out of the Avenues. If Ivory Homes argues that SLC need more moderate housing options we all know with construction prices rising the houses Ivory Homes will not be attracting middle income or young families, they will market to affluent home buyers. I also find it interesting that no one from Ivory Homes lives in the area so it is convenient for them to want to hurt our neighborhood and it won't have any effect on their neighborhood.

In the last ten years our beautiful Salt Lake City has not taken a long-term view of our housing planning. As I drive around neighborhoods in town, I see condos and apartments squeezed into areas where an old house once was. I see neighborhoods blemished with small homes packed into little lots and I think there is no way to reverse this. Please do not take a short-term view on the lot on F Street. The Avenues is a unique gem in in Salt Lake City. Why allow Ivory Home the only opportunity to have a SR-1 Zoning while the rest of the Avenues has developed and grown with existing zoning laws? Ivory Homes will come in, build too many homes, make a sizable profit and be gone while we and our children will live here and live with the consequences. Please say **NO** to Ivory Homes!

Sincerely,
Cynthia Conner

Echeverria, Daniel

From: Mary Lou Van Voorhis <[REDACTED]>
Sent: Wednesday, January 12, 2022 5:30 PM
To: Echeverria, Daniel; Wharton, Chris
Subject: (EXTERNAL) Re: I oppose the Ivory Homes request ot rezone

I strongly oppose the Ivory Homes request to rezone the open space area at the top of F street from FR-3 to SR-1.

For all the reasons stated by the POAZ coalition, I oppose this request. I do not oppose properly zoned housing. I oppose the inappropriate request that would increase the density of the space.

Sincerely,
Mary Lou Van Voorhis
400 E. Capitol Park Ave
#406
SLC, UT 84103
[REDACTED]

Echeverria, Daniel

From: Anne Marie Stahulak <[REDACTED]>
Sent: Wednesday, January 12, 2022 3:57 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Opposition to Ivory Homes Application to Re-zone 675 North F Street

Senior Planner, Daniel Echeverria-

I have have reviewed Ivory Homes's revised proposal and remain opposed to the rezoning of 675 North F Street.

As a neighbor on F Street whereby I support my neighborhood and it's many children, elderly who walk, bike and scooter to school and amble for leisure & health...

My oppositions are as followed:

The 58% increase to the number of residences is unreasonable and against city ordinance and neighborhood opinion. The increased traffic on the steep hill F Street is unsafe to the elementary school students who use F Street and 11th Avenue.

The 300% increase to rezone to gain more lots, and seeking to add an Accessory Dwelling Unit to at least 14 of these lots for a total of 33 dwellings is also unreasonable. 300% is very significant.

Very small lots, minimal set back and minimal greenspace are not in keeping with the neighborhood aesthetics and urban, non-flat land water control (water runoff).

Finally, the loss of habitat with the current plan is unconscionable, I have personally seen the red-tailed hawks and maturing juveniles every year. The mature trees not only provide homes for the hawks and their families, filters for human pollutants but also provide an irreplaceable niche in the Salt Lake City ecosystem.

In addition, re: Avenue Mature Trees: The Avenues area is still recovering from two natural devastations: the 1999 most destructive tornado in Utah's history that uprooted significant numbers of trees and the most recent inland hurricane that significantly damaged mature tree population. We are STILL recovering.

Let us change what we can.

Let reasonable, engaged, caring people come to a reasonable solution for all.

We live here. We care.

Thank you for your consideration.

Sincerely,
Anne Stahulak
454 10th Avenue
SLC, UT 84103

Giving specific reasons for opposition is always better and if you would like to include further detail, attached is a set of talking points you might utilize.

Echeverria, Daniel

From: Maria Mastakas <[REDACTED]>
Sent: Wednesday, January 12, 2022 2:25 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes & Capitol Park

Hi Daniel,

I am writing to you for the third time on behalf of the Capitol Park HOA to voice our opposition to yet another attempt to change the zoning of the property on Capitol Park and F Street, which Ivory still needs an exemption to meet. Our stance has not changed, we are not opposed to the ADU's or the development of the property, we are opposed to an increase in the number of lots and density. I'm struggling to understand how Ivory can ask for a change in zoning yet still not comply.

The tactics and strategy they used to submit this proposal during the holidays was quite unprofessional and really goes against the community. Residents of Salt Lake City, and Utah, value family time, especially around the holidays. Many travel to see relatives or have family in town to celebrate. Knowingly submitting a proposal for rezoning the parcel during this time of year in hopes that less people will voice concern is a very underhanded tactic and really speaks to their ethics. My understanding is that over 100 letters were sent again voicing opposition to the latest request. The opposition to this monstrosity of a project has not faded.

This new zoning request does not alleviate any of the pressures of the housing market Salt Lake City is facing. This is not affordable housing, this is not low income housing, and this is not a shelter for the homeless. This is a builder trying to maximize ROI at the expense of the surrounding neighborhood that is not built to handle the increase in traffic on the already narrow streets.

All of the other points raised in the previous letters we have sent still stand. I am hopeful that the City will take into account the voice of the community and not allow the rezone.

Thanks,
Maria Mastakas
President Capitol Park HOA

Echeverria, Daniel

From: Jannine Elise Hogan <[REDACTED]>
Sent: Wednesday, January 12, 2022 1:36 PM
To: Echeverria, Daniel; Wharton, Chris; Mayor
Cc: [REDACTED] Jannine Hogan
Subject: (EXTERNAL) Ivory Homes Rezone Request 675 North F Street
Attachments: IvoryHomesRezoneLtr12jan2022.pdf

12 January 2022

Dear Madam & Sirs,

Please find attached our letter of opposition to the request for zoning and master plan amendments by Ivory Homes for the parcel at 675 North F Street. This location does not meet the fundamental idea of urban planning and densification as it lacks accessible transportation, walkability for school or work, nor amenities such as restaurants, shops or grocery stores. With the daily concerns for air quality, watershed health, and the long-term, generational quality of life for the community, the Salt Lake City Planning Division and City Council must vehemently stick to the 1987 Restrictive Covenants even to the point of disallowing Accessory Dwelling Units (ADUs).

This is a most important decision for the future health and viability for our community and we hope all parties consider the well-being of our valley over the desire for development and profit.

Respectfully,

William Gilmer & Jannine Hogan
1011 East Third Avenue

DATE: 12 January 2022

ATTENTION: Messrs. Daniel Echeverria & Chris Wharton, Ms. Erin Mendenhall

FROM: William Gilmer and Jannine Hogan

SUBJECT: Ivory Homes Rezone Request 675 North F Street

Mr. Echeverria, Mr. Wharton & Ms. Mendenhall,

I am writing in regards to Ivory Homes' planned Capitol Park Cottages development and request for variances to current zoning criteria. In no way should the Salt Lake City Planning Department and City Council grant the proposed development request for this parcel. Salt Lake City has reached the point of no return with their rampant development and infilling, from lot corner to lot corner, in the downtown area and in no way should this philosophy extend to the areas north of South Temple Street. With the lack of open space greatly diminished it is even more important that the upper avenues act as a buffer between the dense, urban environment below and the open spaces above.

The vacant parcel at 675 North F Street currently possesses attributes that are to be considered highly valuable to any city official involved in long-term development of Salt Lake City. Namely:

- Open space containing large, mature trees, vital to assisting with air pollution,
- Open space available for stormwater infiltration and maintenance of aquifer health, and
- Open space for wildlife and community neighbors to use.

Even if developed to current zoning standards some of this vital open space will be maintained. If the requested changes are allowed irreversible consequences include:

- Loss of vegetation to assist with air quality, riparian health, and wildlife habitat,
- Loss of character that is attractive and highly valuable to the neighborhood,
- Increased parking issues and traffic congestion that should be avoided, and
- An overly dense urban environment adjacent to open space and very important terrain with regards to Salt Lake City's watershed.

Regarding the pell-mell development taking place in the Salt Lake Valley an even better alternative for this parcel would be to not develop it at all! Salt lake City, Ivory Homes, and the adjacent avenues neighborhood have the prime opportunity to protect a disappearing resource that is highly desirable for the future health of our city. That is, OPEN SPACE.

Being a supposed stalwart for the well-being of the state and a good Utah community citizen perhaps Ivory Homes could put aside their vigorous pursuit of profit, work with a city administration that puts aside its desire for tax revenue, and a neighborhood that sees the need to provide open area for its children, pets and mental wellness. Together there could be a mutually satisfactory outcome that would provide a much needed park similar to Lindsey Gardens to the east.

It is painfully apparent that Salt Lake City and the area developers are looking at very short term gains and failing to put long-term vision for the quality of health of our community.

CC [REDACTED]

Echeverria, Daniel

From: Chris Winter <[REDACTED]>
Sent: Wednesday, January 12, 2022 9:07 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ave Zoning

- [REDACTED]

Just change "we" to "I" and of course change the name and address at the end.

Thanks for your help!

<<<<<

Dear Mr. Echeverria:

I am a long-time resident of the Avenues. I strongly object to Ivory Homes' current request for rezoning at the property located at 675 N 'F' Street. Ivory is requesting a rezone from FR-3 to SR-1. This will reduce the minimum lot size to only 5000 sq ft. They are also requesting an increase from 11 to 19 homes. Moreover, Ivory plans to include 14 or so ADUs. That's a total of 33 new buildings. That's not suitable for the Avenues. The intent of allowing ADUs to exist was to provide help for individual homeowners who felt the need. The intent was NOT to help a developer make more money on less land. Ivory's rezone request is altogether too dense for this location.

As you are well aware, zoning regulations exist for a reason. If zoning regulations can be changed whenever a developer wants to change them, what good are they? If the proposed changes were for the good of the community, maybe that would be a reason to approve a rezone. Well, in this case, the rezone is definitely not for the good of the community. This is totally obvious if you look at the results of past votes taken by the Greater Avenues Community Council (GACC) [1244 to 25 against rezoning]. The rezone would only be for the good of Ivory Homes, so they could squeeze more money out of their intended project.

I am concerned about growing traffic on our Avenues streets. These streets were designed and built many years ago. They were not built for heavy usage. They already

present risks at 4-way corners. So much additional traffic from the proposed over-populated cottages would exacerbate the dangers. Then, because we are at a higher elevation than most parts of Salt Lake City, the risks get even worse on snowy or icy days. In addition, we are an active neighborhood, with many walkers and cyclists. Please notice our attempts at “traffic calming.” We don’t need more traffic to add more danger for pedestrians!!!!

Ivory’s request is not compatible with the ambiance of our neighborhood. Two of the aspects we most love about the Avenues are the relative quiet of the neighborhoods and the presence of older, individually-built homes, each with their own unique characteristics. These proposed homes do not align with that vision. According to Ivory’s plans, there will be minimal setback and minimal greenspace. There are even a number of lovely mature trees that would be removed. That’s bad for wildlife, bad for aesthetics, bad for our quality of life, and not suitable for the Avenues.

In summary, Ivory Homes’ request for a rezone at 675 N ‘F’ Street lacks a logical basis for approval. Please do the right thing and do not approve the request.

Respectfully submitted,

Chris Winter

771 Northcrest Dr.

SLC UT 84103

-
-
-
-

-
- Reply
 - ,
 - Reply All
 - or
 - Forward

Mr. Daniel Echeverria
Senior Planner, Planning Division
Salt Lake City

400 E Capitol Park Ave
Apt 306
Salt Lake City, UT 84103
1/12/2022

Dear Mr. Echeverria,

Re: Ivory Homes Retaining Walls 675 North F Street

Thank you for attending the 1/5/2022 GACC meeting. At this meeting Mr. Gamvroulas made light of our concerns regarding the abnormally large number of tall retaining walls and likened them to Northpoint's boundary wall. I have attached some photographs showing Northpoint's boundary wall.

The overall length of Northpoint's wall on the north boundary of Ivory's property is 415 feet. The major section of this wall to the west, running for 318 feet is shown in [Figure 1](#). This has a short, three to five feet retaining wall at the base, with a 6'-0" tall wrought iron fence between columns on top. This is far less oppressive than the retaining walls Ivory is proposing. The eastern section of Northpoint's wall does have a solid section 97 feet long to hide dumpsters. This has a five feet concrete retaining section at the base with a seven feet brick section on top. This is shown in [Figure 2](#). I think you would agree that this solid wall is more oppressive than the short boundary wall with open fencing.

Whereas there is currently 97 feet of this solid wall, Ivory is proposing to add 1,627 feet of tall, solid retaining walls, several which will be taller than the current Northpoint wall. They will be much closer to neighboring streets and will run both north/south and east/west. They will also consume most of the small, side lot or rear lot setbacks, giving a high bulk appearance.

It is our opinion, including that of the highly experienced architects and landscape architects that are part of our group, that this design is unacceptable. This proliferation of large unsightly retaining walls, particularly in combination with such a tightly packed high bulk development, create a totally unacceptable aesthetic for this predominantly single-family location.

Against a background where the city has declared a housing crisis, we can understand the temptation of the planning division to approve plans that in more normal times would be rejected. Please bear in mind that housing crises tend to be temporary, but poorly designed housing projects last generations.

Yours sincerely,

Peter Wright



Figure 2



Echeverria, Daniel

From: CATHY RALLISON <[REDACTED]>
Sent: Tuesday, January 11, 2022 8:52 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes plans in upper Avenues

January 11, 2022

Hello Mr. Echeverria,

I am a resident of the upper Avenues. I am writing to you with my concern about the Ivory Homes plan to have an area of the upper Avenues rezoned so that Ivory Homes can build 33 dwellings on 675 North F Street. I have been on that street several times, and I cannot imagine how so many additional autos will fit on that street. I worry that a child will be hit by a car on that street with so many new dwellings which will all have cars.

I assume you have seen the area that Ivory Homes wants. Go there again, and picture children walking and playing in that area.

One of my children had a friend that lived on that street many years ago. I gave that little girl a ride home after a play date and had to pull into someone's driveway to turn around in my Suburban. This area is simply not an appropriate place to build 33 dwellings...each with an accessory dwelling...and each dwelling with automobiles.

Please help us protect this neighborhood and the citizens who live there.

Thank you for reading my letter and listening to my concerns.

Cathy Rallison

Echeverria, Daniel

From: LYNN COLGREN <[REDACTED]>
Sent: Tuesday, January 11, 2022 7:49 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Protect Our Avenues

Hello,

I live and work in the Avenues and I strongly oppose the Ivory Homes request to rezone the open space on F St from FR-3 to SR-1. The area is not well-suited for the density that is proposed. Traffic from putting 33 units in a space zoned for 11 will cause a congested, annoying nightmare. Please don't cut down the trees. With a properly designed new housing plan we could maintain the ambience of our bucolic and livable Avenues.

Thank you for listening,

Lynn Colgren
470 H St

To: Daniel Echeverria
Senior Planner
Salt Lake City Planning Division
[REDACTED]

From: David Garcia
Avenues Resident
282 N Canyon Road
SLC, 84103
[REDACTED]

Date: January 11, 2022

Topic: Ivory Homes
Concessions for 675 North F Street

Existing zoning laws were put in place for reasons. Ivory Homes' ongoing concession requests are aimed at excluding their project from one, two, three, four, or more aspects of the existing zoning laws, and ignore the Avenues Community Master Plan for the area. There were (and are) reasons that the existing zoning laws were enacted, primarily preservation of the unique flavor of the Avenues.

In their ongoing concession requests, Ivory Homes has focused on changing details. But the elephant in the room remains, a complete trashing of zoning codes to over-develop the plot. With the most recent proposal, creation of 8 new lots, 14 additional Accessory Dwelling Units, at least 6 lots with less than minimum stipulated size, and none of the 19 total lots meeting yard setback requirement, the elephant is on a stampede.

An egregious aspect to overturn existing zoning ordinances relates to Auxiliary Dwelling Units. The envisioned price range for homes in the development has been stated as \$700,000 to \$1 million. This is a multiple (2x or 3x, depending on the basis considered) of average home price in Salt Lake City. Open question: what pool of buyers in this price range would see the attraction of an ADU? Or have situations where it would be preferable to have such an apartment? The flimsy social bait premise is a talking point, not a community benefit.

I am against Ivory Homes most recent requests for concessions.

file: 282 / F-Street-January2022

Echeverria, Daniel

From: Patrick Park <[REDACTED]>
Sent: Tuesday, January 11, 2022 4:27 PM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) Opposition to the proposed Avenues Ivory Home rezone

I would like to register my opposition to the Ivory Homes proposed rezoning of Avenues properties near 675 North F Street. I object to changing the zoning of this residential area from FR-3 to SR-1. Their proposed project would have immediate, long-term and tragic consequences for my neighborhood and the surrounding foothills. There are many reasons to object to this project and I welcome the opportunity for the community to voice them. My previous email described in much greater detail the many negative consequences to this projects scope. Let it further be said that this endpoint community is not prepared for the traffic, use of services and pollution. Thank you for your time and attention to this urgent matter. I do not think Ivory Homes is acting in good faith with its frequent and excessive requests to overpopulate this plot.

--

Thanks.

Patrick Park

Echeverria, Daniel

From: Joan Vrtis Wong <[REDACTED]>
Sent: Tuesday, January 11, 2022 4:03 PM
To: Echeverria, Daniel; Wharton, Chris
Cc: [REDACTED]
Subject: (EXTERNAL) Ivory Homes' Rezone Request

Mr. Echeverria and Mr. Wharton-

I am an Avenues resident and am writing to inform you of my **disapproval** of the most recent plans submitted by Ivory Homes to develop the property located at 675 North F Street with its rezone request. To place a total of 33 dwellings (19 primary and 14 ADUs) on a parcel of property currently zoned for 11 primary residences is outrageous and *unconscionable*.

I have many concerns about this project, but foremost are the proposed density of the project and the impact it will have on traffic in the area. I live on E Street, which already has plenty of traffic and numerous speeding problems.

Please do the right thing and **oppose** this rezone request as vocally requested by the vast majority of the area residents.

Thank you,
Joan Wong
372 E Street
Salt Lake City

Echeverria, Daniel

From: Kellee Burton <[REDACTED]>
Sent: Tuesday, January 11, 2022 3:40 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Rezoning

The proposed rezoning of the area at the top of F street FR-3 to higher density SR-1 will cause traffic issues that will affect the western end of the avenues and stress infrastructure in the area. The housing density will also affect wildlife in the area negatively. I strongly oppose the rezoning of this area to higher density.

Thank you, Kellee Burton, 669 G Street

Sent from my iPad

Echeverria, Daniel

From: Judy Mallory-McCorvey <[REDACTED]>
Sent: Tuesday, January 11, 2022 2:37 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Capitol

I am deeply concerned about the possibility of Ivory homes developing 19 plus homes. The impact would change the avenues in a negative way. I have been a home owner for twenty-eight years in proximity to the proposed development and the environmental costs alone are truly disturbing. Please vote no for this project to advance. We as a community would be extremely grateful.

Echeverria, Daniel

From: chris kolb <[REDACTED]>
Sent: Tuesday, January 11, 2022 2:37 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) NO Ivory Homes Re-Zone

Mr. Echeverria, Salt Lake City Planning Division,

Please consider my letter in opposition to the Ivory Homes Rezoning application for 675 F St.

Even with the minor changes that have been made by Ivory Homes in their application for the Capitol Park Cottages Planned Development, it is still completely inappropriate for the space and for the neighborhood. The current zoning standards for this area of the Avenues were put into place for a reason and have continued to work and keep it as one of Salt Lake City's best neighborhoods. A potential 300% increase in density for this location does not make sense in the upper Avenues, especially in an upper corner that is realistically only serviced by 2 minor streets. With the couple of condo developments present, it is likely already one of the more dense areas of the upper Avenues, it is the wrong place to make even more dense due to its restricted accessibility.

Salt Lake City's 5-Year Housing Plan that Ivory keeps referencing as a reason for the need of this kind of development does not match with this location. That plan calls for high-density in walkable areas and to provide needed affordable housing. While recreational walking is common for this neighborhood, it is not realistically walkable to a significant amount of stores or restaurants or to work. As someone who loves to walk and would walk when possible, walking up that hill when it is hot or when it is cold or carrying your groceries uphill just does not happen with any regularity. And because of the neighborhood and the square footage of the proposed homes, there is nothing affordable of what will be close to or over a \$1 million purchase price.

There is no benefit to the neighborhood that comes from rezoning to the SR-1 zone. The upper avenues does not need taller buildings and all of the exceptions that are provided in the Planned Development including smaller lots and decreased setbacks go strongly against what is typical in the neighborhood. The Avenues Community Master Plan was created to guide development, and the changing of these norms would be very unfair to everyone who has previously purchased property in this mature neighborhood. There was no reason to anticipate that such a drastic change in zoning would ever be allowed to take place, especially on a lot that until recently was not even zoned as residential.

Ivory calling this a project that "will reimagine how to provide housing diversity and housing attainability in Utah and honor the history of Salt Lake's most unique neighborhood, the Avenues" is absurd. The price will not make these properties attainable, and what already makes this neighborhood unique is the diversity of the housing. A vanilla, cookie-cutter, belongs-in-suburbia development like this does not fit into or remotely improve one of the most historic and unique neighborhoods that Salt Lake City has to offer.

And finally, the neighborhood has spoken in unison regarding the opposition of this zone change and planned development to the tune of 1244-25. I'm actually surprised that Ivory was even able to get 25 friends, relatives, and investors to vote in favor this project. This project would not benefit anything except for Ivory's bottom line.

Please do not make a decision that will absolutely ruin one of Salt Lake City's great neighborhoods.

Chris Kolb
695 G St

Echeverria, Daniel

From: Mary Lou Van Voorhis <[REDACTED]>
Sent: Tuesday, January 11, 2022 2:30 PM
To: Echeverria, Daniel; [REDACTED]
Cc: [REDACTED]
Subject: (EXTERNAL) I oppose the Ivory Homes request ot rezone

I strongly oppose the Ivory Homes request to rezone the open space area at the top of F street from FR-3 to SR-1.

For all the reasons stated by the POAZ coalition, I oppose this request. I do not oppose properly zoned housing. I oppose the inappropriate request that would increase the density of the space.

Sincerely,
Mary Lou Van Voorhis
400 E. Capitol Park Ave
#406
SLC, UT 84103
[REDACTED]

Echeverria, Daniel

From: Paul McKinnon <[REDACTED]>
Sent: Tuesday, January 11, 2022 1:53 PM
To: Echeverria, Daniel
Cc: Janice McKinnon; Wharton, Chris
Subject: (EXTERNAL) Vote Against the Zoning Change

Mr. Echeverria,

Please **do not grant** the zoning change to Ivory Homes for the lot in the Upper Avenues on F Street. As you know, you received 2200+ signatures, asking you to not change the zoning. At two separate GACC meetings, the vote against Ivory was more than 97% against the zoning change. Yet, from your demeanor at the meeting last week, you seem determined to give it to the fat cats at Ivory.

I grew up thinking that homeowners had some rights to determine what happens in their neighborhood. I grew up thinking that city government actually listened to and gave consideration to the views of the voters in the neighborhood. I grew up thinking that citizens have a voice. You must have grown up with a different set of assumptions, because the people in the Avenues have clearly spoken. You have received at least 120 notes asking you **to not grant** the zoning change.

How many letters have you received from people in the Avenues, asking you to grant the change? Would you be willing to share that number? Or don't you care?

Turn down the request. If you vote yes, you will create more animosity, and for what? A few extra dollars for Ellis Ivory?

Let me know about the numbers in favor.

Paul McKinnon
400 Capitol Park Ave, Unit 302
SLC, UT 84103

Echeverria, Daniel

From: Boyd Baugh <[REDACTED]>
Sent: Tuesday, January 11, 2022 12:13 PM
To: Echeverria, Daniel; Wharton, Chris
Subject: (EXTERNAL) Ivory Homes Application to Re-zone 675 North F Street

Daniel Echeverria,

I have reviewed Ivory's revised proposal for the above-referenced project and remain opposed to the rezoning of 675 North F Street. The neighbors have voted overwhelmingly against rezoning the property. I hope you will respect our concern and decline Ivory's request.

Most of the traffic resulting from Ivory's proposal would affect Capitol Park Avenue, a private street that is not adequate to accommodate the increase in traffic. It's a safety issue.

Why would you want to subject current residents to a situation that affects their safety?

The current Zone of the property does not need to be changed, and should not be changed.

Please respect the will of the current residents, the local homeowners, and citizens of the Avenues community.

Thank you for your consideration!

Sincerely,

Boyd Baugh
Owner
400 Capitol Park Ave, # 401
Salt Lake City, UT 84103

Echeverria, Daniel

From: Robert McClane <[REDACTED]>
Sent: Tuesday, January 11, 2022 10:25 AM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) Ivory Holms Rezone

To whom it may concern:

I am a long time resident and property owner in the Avenues. **I strongly oppose** Ivory Homes' request to rezone the open space area at the top of F St. from FR-3 to SR-1. I am not opposed to developing one's property, but it should be done within the zoning that every one else has to follow, not a special deal for this developer. This rezone request will have many negative effects on the entire Avenues. Not only will it create unmanageable traffic congestion in the immediate area, but it will negatively affect the entire western avenues.

I do not oppose thoughtfully zoned new housing or even a rezone if appropriate to an area, but I strongly oppose Ivory Homes request to greatly increase the density of this space. This is not even close to an appropriate rezone request.

Robert McClane

Echeverria, Daniel

From: Lou Jean Flint <[REDACTED]>
Sent: Tuesday, January 11, 2022 7:45 AM
To: Echeverria, Daniel
Subject: (EXTERNAL)

Mr. Echeverria, I do hope you have now received my email concerning the Ivory Homes property at 675 North F St. It was purchased with City Ordinances in place at the time of bidding on this property. Please do not change any of the Ordinances for they protect the current property owners and Ivories proposal places far too many people in too small a space.

I strongly oppose the changes Ivory is requesting.

Please let me know if there is anything else needed to place this opposition in order.

Appreciatively, Lou Jean Flint, 420 12th Avenue, Salt Lake City, Utah
84103

Echeverria, Daniel

From: Rick Gamble <[REDACTED]>
Sent: Tuesday, January 11, 2022 7:02 AM
To: Echeverria, Daniel; Rick Gamble
Subject: (EXTERNAL) Comment re. Ivory Homes current rezone request

Dear Mr. Echeverria:

My wife and I are long-time residents of the Avenues. We strongly object to Ivory Homes' current request for rezoning at the property located at 675 N 'F' Street. Ivory is requesting a rezone from FR-3 to SR-1. This will reduce the minimum lot size to only 5000 sq ft. They are also requesting an increase from 11 to 19 homes. Moreover, Ivory plans to include 14 or so ADUs. That's a total of 33 new buildings. That's not suitable for the Avenues. The intent of allowing ADUs to exist was to provide help for individual homeowners who felt the need. The intent was NOT to help a developer make more money on less land. Ivory's rezone request is altogether too dense for this location.

As you are well aware, zoning regulations exist for a reason. If zoning regulations can be changed whenever a developer wants to change them, what good are they? If the proposed changes were for the good of the community, maybe that would be a reason to approve a rezone. Well, in this case, the rezone is definitely not for the good of the community. This is totally obvious if you look at the results of past votes taken by the Greater Avenues Community Council (GACC) [1244 to 25 against rezoning]. The rezone would only be for the good of Ivory Homes, so they could squeeze more money out of their intended project.

We are concerned about growing traffic on our Avenues streets. These streets were designed and built many years ago. They were not built for heavy usage. They already present risks at 4-way corners. So much additional traffic from the proposed over-populated cottages would exacerbate the dangers. Then, because we are at a higher elevation than most parts of Salt Lake City, the risks get even worse on snowy or icy days. In addition, we are an active neighborhood, with many walkers and cyclists. Please notice our attempts at "traffic calming." We don't need more traffic to add more danger for pedestrians!!!!

Ivory's request is not compatible with the ambiance of our neighborhood. Two of the aspects we most love about the Avenues are the relative quiet of the neighborhoods and the presence of older, individually-built homes, each with their own unique characteristics. These proposed homes do not align with that vision. According to Ivory's plans, there will be minimal setback and minimal greenspace. There are even a number of lovely mature trees that would be removed. That's bad for wildlife, bad for aesthetics, bad for our quality of life, and not suitable for the Avenues.

In summary, Ivory Homes' request for a rezone at 675 N 'F' Street lacks a logical basis for approval. Please do the right thing and do not approve the request.

Respectfully submitted,

Rick Gamble

929 N Terrace Hills Dr

SLC UT 84103

Echeverria, Daniel

From: L S <[REDACTED]>
Sent: Monday, January 10, 2022 7:00 PM
Subject: (EXTERNAL) Strongly oppose the Ivory Homes request to rezone the open space area at the top of F.

I strongly oppose the Ivory Homes request to rezone the open space area at the top of F. Street from FR-3 to SR-1. The density will cause unmanageable traffic in the area, affecting the entire western avenues. The fire department has said emergency vehicles will not be able to access the upper avenues safely, Red-tailed hawks nest in the trees in that space, and if 33 units are built in a space zone for 11, the trees cannot be saved. I do not oppose properly-zoned new housing; I oppose Ivory Homes request to improperly increased the density of the space.

Our historic neighborhood does not need more apartment units!

We need to put a moratorium on building in the Avenues and in the whole valley.
We're in a desert with limited water.
We'll end up like Las Vegas and Phoenix if we don't do something NOW!

Regards,
L. Schine
Home Owner on F Street

Echeverria, Daniel

From: Marilyn Neilson <[REDACTED]>
Sent: Monday, January 10, 2022 6:29 PM
To: Echeverria, Daniel
Cc: [REDACTED] Preserve Our Avenues Zoning Coalition
Subject: (EXTERNAL) Avenues Rezoning

Dear Daniel, This is to urgently petition the Council to dismiss the Ivory application for rezoning of the Avenues. For every ecological issue of fire concerns, high retaining walls in earthquake zones, heavy traffic during especially wintertime on slippery steep hills, water usage, noise pollution with canyon recreation, multiple cars needed as there are no nearby services, destroying the habitat of wildlife, Etc etc. The invasion of such density is out of sync with the neighborhood and there are many places in the City that would serve the home purchasers better and a more appropriate environment for affordable housing units. Please hear the pleas of all Avenue's residents. We don't want density and retaining walls and ADU's in a residential neighborhood.

Thank you, Marilyn Neilson

Marilyn Neilson

Echeverria, Daniel

From: Lou Jean Flint <[REDACTED]>
Sent: Monday, January 10, 2022 5:58 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Fwd:

----- Forwarded message -----

From: Lou Jean Flint <[REDACTED]>
Date: Mon, Jan 10, 2022 at 12:09 PM
Subject:
To: <[REDACTED]> <[REDACTED]>

Dear Sirs,

Please do not consider the Ivory Homes requests for changing City Ordinances which were in place when this property was purchased. I believe that they purchased this property knowing the Ordinances and nothing they have suggested enhances this property or neighborhood. If Ivory Realty cannot abide by the rules set at purchase they need to sell this property to someone who can build within City Ordinance rule.

Lou Jean Flint

420 12th Avenue, Salt Lake City, Utah 84103.

Echeverria, Daniel

From: Suzanne Miner <[REDACTED]>
Sent: Monday, January 10, 2022 5:50 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Rezone

Hello Mr. Echeverria,

I am sending this email to let you know that I live in the Avenues and am opposed to the Ivory Home rezone. The land in question can be developed without a rezone. The Avenues is crowded and adding dense housing will only add more traffic in the area. The Avenues is a unique area and with proper development and planning can stay that way. I feel that if the Avenues needs to be rezoned for the Ivory development that the development has not been properly planned out to keep the area safe, liveable and unique.

Thank you for your work on this issue and for your consideration of the views of those most affected by the proposed development.

Suzanne Darais
326 K Street
[REDACTED]

Echeverria, Daniel

From: Larry Perkins <[REDACTED]>
Sent: Monday, January 10, 2022 3:41 PM
To: Echeverria, Daniel
Cc: Mayor; Wharton, Chris
Subject: (EXTERNAL) Ivory Homes & Capitol Park Cottages

Dear Mr. Echeverria,

I feel like I may have to apply for "Pen Pal" status with you as a result of Ivory Homes and their persistent casting about for ways to circumvent Salt Lake City's building and zoning decisions regarding the Avenues neighborhood in which I have lived for 30 years. This is now my 3rd letter to you in the last year and a half, and it is prompted by Ivory's latest attempt to get your approval for them to ignore the set back and landscaping regulations that have created the neighborhood they now want to profit from.

Please Do Not Amend Or Change Our Existing Master Plan Nor The Existing Zoning On The 675 North F Street Parcel Which Ivory Purchased a Year Ago With Full Knowledge Of The Zoning Limitations Attached To It.

Any talk of "affordable housing" in Ivory's plans is a blatant lie. And the lie is motivated by the potential profit any developer can make by constructing more "doors" on any given amount of land. But Ivory's iterations of proposals on this specific parcel are particularly flagrant because (a) Ivory seeks to override and disregard the objections of neighbors such as myself who have complied with existing zoning rules and (b) Ivory wants to do that by using the Narrow, Privately Built and Privately Maintained road (Capitol Park Avenue) that was created and paid for by neighbors such as myself to handle traffic consistent with Current Zoning Only. EVERY ONE of Ivory's proposed Lots not directly fronting F Street can be accessed ONLY via Capitol Park Avenue.

Observing Ivory flailing around to find Any Way to circumvent setback requirements as they demand a density that cannot be met within any Zoning option they can hope to argue for, would be laughable were it not seriously detrimental to our neighborhood! The problems Ivory will create WITHIN its own development (in terms of narrow streets, inadequate parking, poor access for ambulances and fire trucks as well as garbage trucks) will spill out into our neighborhood.

Zoning changes should be permitted ONLY when they are clearly of benefit to All Stakeholders. Please do not allow Salt Lake City to become a co-conspirator with Ivory to undermine and detract from the investments made by myself and others in reliance on the development framework established by Salt Lake City with its Existing Zoning.

Salt Lake City Regulations do not allow us (the owners of Capitol Park Avenue) to veto Ivory's plans to misuse that property of ours. We must instead rely on the Salt Lake City Authorities like you and the Planning Commission and The City Council to keep faith with the framework under which we built the infrastructure Ivory seeks to profit from.

It is to be emphasized that Ivory will not be here to deal with the results of their overly dense plan! **That would be left on the shoulders of those of us who pay for Capitol Park Avenue.**

Sincerely, Larry Perkins
405 E 12th Ave
Salt Lake City, UT 84103

Echeverria, Daniel

From: CClark <[REDACTED]>
Sent: Monday, January 10, 2022 3:30 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Comment re. Ivory Homes current rezone request

Dear Mr. Echeverria:

My husband and I are long-time residents of the Avenues. We strongly object to Ivory Homes' current request for rezoning at the property located at 675 N 'F' Street. Ivory is requesting a rezone from FR-3 to SR-1. This will reduce the minimum lot size to only 5000 sq ft. They are also requesting an increase from 11 to 19 homes. Moreover, Ivory plans to include 14 or so ADUs. That's a total of 33 new buildings. That's not suitable for the Avenues. The intent of allowing ADUs to exist was to provide help for individual homeowners who felt the need. The intent was NOT to help a developer make more money on less land. Ivory's rezone request is altogether too dense for this location.

As you are well aware, zoning regulations exist for a reason. If zoning regulations can be changed whenever a developer wants to change them, what good are they? If the proposed changes were for the good of the community, maybe that would be a reason to approve a rezone. Well, in this case, the rezone is definitely not for the good of the community. This is totally obvious if you look at the results of past votes taken by the Greater Avenues Community Council (GACC) [1244 to 25 against rezoning]. The rezone would only be for the good of Ivory Homes, so they could squeeze more money out of their intended project.

We are concerned about growing traffic on our Avenues streets. These streets were designed and built many years ago. They were not built for heavy usage. They already present risks at 4-way corners. So much additional traffic from the proposed over-populated cottages would exacerbate the dangers. Then, because we are at a higher elevation than most parts of Salt Lake City, the risks get even worse on snowy or icy days. In addition, we are an active neighborhood, with many walkers and cyclists. Please notice our attempts at "traffic calming." We don't need more traffic to add more danger for pedestrians!!!!

Ivory's request is not compatible with the ambiance of our neighborhood. Two of the aspects we most love about the Avenues are the relative quiet of the neighborhoods and the presence of older, individually-built homes, each with their own unique characteristics. These proposed homes do not align with that vision. According to Ivory's plans, there will be minimal setback and minimal greenspace. There are even a number of lovely mature trees that would be removed. That's bad for wildlife, bad for aesthetics, bad for our quality of life, and not suitable for the Avenues.

In summary, Ivory Homes' request for a rezone at 675 N 'F' Street lacks a logical basis for approval. Please do the right thing and do not approve the request.

Respectfully submitted,

Carolyn Clark

929 N Terrace Hills Dr

SLC UT 84103

Echeverria, Daniel

From: [REDACTED]
Sent: Monday, January 10, 2022 3:23 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Homes Re-zone

Dear Mr. Echeverria,

I'm writing as a resident of the Avenues to express my opposition to Ivory Homes' request to re-zone the property at 675 North F Street. The property is currently zoned FR-3, in accordance with the Avenues Community Master Plan, and I wish to see it stay with that zoning. Ivory Homes is able to do very well financially with the property under its current zoning without cramming ever more people into a limited space, with no regard for the impact of their development on existing Avenues residents. Even with the current zoning, the development will significantly increase traffic on the Avenues' roads, not to mention its affect on the character of the neighborhood.

Respectfully,

Patrick Smith

87 'E' Street

Salt Lake City Avenues

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Echeverria, Daniel

From: cynthia buckingham <[REDACTED]>
Sent: Monday, January 10, 2022 2:22 PM
To: Echeverria, Daniel; Wharton, Chris; Jan McKinnon
Subject: (EXTERNAL) 675 F Street rezone request by Ivory Homes

Dear Mr. Echeverria,

I am writing in opposition to Ivory Homes' request for rezoning at 675 N F Street. I live in the neighborhood and am very concerned about the potential for a poorly designed development that could set a precedent for other bad proposals. I am not opposed to developing the parcel, or to ADUs, but believe that the current proposal is inappropriate for several reasons.

My greatest concern is that the Planning Commission and City Council might not be aware of the many ways the proposed development does not meet SR-1 zoning requirements.

- Multiple lots less than the minimum square feet
- Multiple lots less than the minimum lot width
- Majority of lots do not meet front, side, or rear setback requirements
- Majority of lots violate garage orientation requirement
- Multiple lots exceed the maximum building coverage allowance
- One of the biggest issues, in my opinion, is that there is about a 50- foot elevation change in the parcel, which requires steep building terraces and high retaining walls between units. Ivory's plan exceeds SR-1 zoning limitations for retaining wall terrace heights, setbacks, and separation minimums, and the resulting lots will be uncomfortable on the site and unattractive to both neighbors and potential buyers (imagine looking out your window at a 14-foot retaining wall!).

I understand that a Planned Development designation would allow Ivory Homes to bypass the SR-1 requirements. However, A PD is expected to create "a more enhanced product than would be achievable through strict application of land use regulations," which is not the case with Ivory's plan. In addition, criteria for a PD include six stated objectives, none of which are met by this plan:

- A. Natural lands preservation (mature trees and wildlife habitat will be destroyed)
- B. Historic preservation (the only historic component is the open land)
- C. Affordable housing (neither homes nor ADUs will be "affordable")
- D. Mobility enhancement (convenient public transportation is not available and increased neighborhood traffic will be significant)
- E. Sustainability advantage (not demonstrated)

F. Master plan implementation (The SLC Avenues Master Plan was developed in 1987 and doesn't address this kind of development.)

Importantly, SLC's "Purposes and objectives of a Planned Development" states, "The PD process is not intended to be a means to simply obtain variances from zoning regulations."

The problem is simple: Ivory Homes is trying to crowd too many structures on the site. Their design does not fit SR-1 or PD.

The solution is also simple: Ivory could redesign a development, including ADUs, within SR-1 code regulations with a reduced number of units spread further apart. I believe this could be done by dropping the number from 19 to a maximum of 15 buildings. Of course, Ivory would still make a significant profit while meeting several important code requirements and neighborhood objectives.

I hope that you and your colleagues will complete a comprehensive analysis of Ivory's plans and provide a clear explanation of all of the ways the proposed Ivory Homes development at F Street violates SR-1 code and does not accomplish PD objectives to the Planning Commission and City Council, so that they can make informed decisions that are defensible to the public.

Thank you for your public service.

Cynthia Buckingham
655 H Street

LON A. JENKINS
786 Northpoint Drive
Salt Lake City, Utah 84103
801-661-5414

January 10, 2022

Re: Ivory Homes Proposed Development of 675 F Street

Daniel Echeverria
Senior Planner
Salt Lake City Planning Division
(daniel.echeverria@slcgov.com)

Dear Mr. Echeverria:

I am a resident of Northpoint Estates and wish to voice my opposition to the planned development of 675 F Street currently proposed by Ivory Homes. Just to be clear at the outset, I am not opposed to a reasonable development of the site. However, the project proposed by Ivory Homes in my view is not a reasonable development consistent with the surrounding Avenues neighborhood. It requires significant rezoning from present zoning requirements – to SR-1 zoning which does not currently exist in the Avenues - and imposes an unacceptable level of density in an area which values low density. If Ivory Homes wishes to develop consistent with the FR-3 zoning requirements there would be no opposition. However, through several iterations, Ivory Homes has persisted in attempting to push through a development which has repeatedly met with virtually unanimous community opposition, each time pushing the envelope further to win approval of its rezone. Ivory Homes should not be rewarded in that effort.

I have spent a considerable amount of time studying the most recent proposal by Ivory Homes and find it wholly incompatible with the surrounding neighborhood in a multitude of respects. First and foremost, it attempts to take a beautiful 3 acres of foothill property and pack it with 19 homes and 14 ADUs – for a total of 33 residences - far outstripping the maximum number of homes which compliance with present zoning requirements would allow. The amount of hard surface necessary in the proposed development will far out-pace any possible inclusion of green space making for an uninviting and unattractive site inconsistent with the aesthetics of this lovely foothills area. As a result of the dramatically reduced lot sizes, no residences will observe the presently required front, back and side setbacks – indeed, several of the sites would not even observe the setbacks required by the SR-1 zoning for which Ivory Homes seeks approval! Because of the steep slope of the site (I understand an approximate 50-foot drop from north to south) the proposed site will create a series of building platforms separated by retaining walls possibly as high as 16 feet. Accordingly, the dominant feature of the site will be a dense and busy conglomeration of unsightly retaining walls and roofs which is completely inconsistent with the surrounding neighborhood. With respect to roof heights, Ivory Homes' proposed rezone would allow roof heights up to 28 ft above grade from the presently required 23 feet. A rezone with that excess building height absolutely should not be approved – valley and mountain views are an important feature of this upper Avenues location and neighbors' views should not be obstructed and compromised simply because Ivory Homes sees an opportunity to increase its profits by building taller, larger homes.

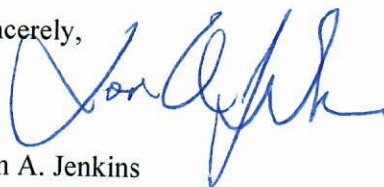
The proposed project will impose unnecessary burdens on current infrastructure and serious concerns exist about water runoff, injury to wildlife habitat, and traffic congestion on F Street and Capital Park Avenue, among other things. The area simply is not equipped to handle the population density proposed by Ivory Homes and Ivory Homes has made no or minimal attempts to address these important issues.

It seems quite clear that Ivory Homes' inclusion of ADUs in the development is nothing more than a scheme to appeal to City planners. While ADUs have been approved by Salt Lake City and certainly can serve the important goal of providing additional affordable housing in the current housing shortage environment, Ivory Homes' inclusion of ADUs in original construction in this proposed development appears to be unprecedented. Realistically, there is nothing "affordable" about the proposed housing at the F Street development; in the current real estate market it is not difficult to imagine that the homes will easily sell for in excess of \$1 million each. Even in the current environment, that is far from affordable. In addition, the absence of meaningful and convenient public transportation serving the area underscores the fallacy of Ivory Homes' suggestion that ADUs make sense in the location.

Finally, at a recent Great Avenues Community Council open meeting, Ivory Homes' representative made clear that its proposed project has little to do with enhancing the neighborhood, creating a neighborhood compatible development or working with surrounding Avenues neighbors. When asked why Ivory Homes was seeking a rezone when it could accomplish its goals (construction of luxury homes with ADUs) without seeking rezoning, Ivory Homes' representative stated candidly, "Because the project we *want* to build will not fit within the current zoning requirements." That, however, is not a justification to approve a rezone. Instead, it is a justification for Ivory Homes to retool its development to fit within current Avenues zoning requirements. Ivory Homes should do just that and not obtain approval for a development which will be incongruous with the existing upper Avenues community.

Thank you for considering my views.

Sincerely,



Lon A. Jenkins

cc: Chris Wharton (chris.wharton@slcgov.com)
POAZC (POAZCoalition@gmail.com)

January 10, 2022

Dear Mr. Echeverria,

My wife Jessica Wiley and myself are writing with our **very strongest objection** to the proposed zoning change from FR-3 to SR-1 for the 3 acre property located at 673 N. F Street (that is, parcel number 09304550210000 located on the northwest corner of F Street and Capitol Park Avenue).

First and foremost, we are NOT opposed to the development of this site; rather, we are opposed to changing the zoning.

Our understanding is that the current FR-3 (for Foothill Estates Residential) zoning calls for residential use with **up to 11 (maximum) *single-family homes on 12,000 square foot lots***. This zone only allows single-family dwellings. This is acceptable and Jessica and I have no objection to this.

However, the developer, Ivory Homes, is proposing a change from FR-3 to SR-1 AND seeks a Planned Development exception AND seeks permission to place 14 accessory dwelling units on the site.

The proposed change to SR-1 (Special Development Pattern Residential) zoning would allow for ***much more compact dwellings (almost 2x the number - from 11 to 18 units on 50% smaller parcels (12,000sf → 5,000sf))*** placed on this parcel. This substantially increases the density of homes in this area, and SR-1 zoning (not to be confused with SR-1A) does not exist in the Avenues residential area.

The exception and request for ADUs will be to **add 14 ADUs to this parcel**. This substantially increases the density of this area in general and within each parcel in particular. The proposed ***total of 33 dwellings (18 homes +14 ADUs) exceeds the current zoning by 300% and further increases the ‘compact’ feeling of the parcel***. This is an abnormal increase with significant ramifications for the area that are discussed below.

Finally, due to literally needing to “pack in” the homes on a sloped parcel, and facing the need to work around setback rules within SR-1, Ivory Homes is requesting a **“planned development” exemption**. A “planned development” is designed and intended to be used for development around a specific feature (pond, cliff, other area of geographic interest). Thus, a planned development allows the developer to work around said geographic feature. In this proposal, the developer is requesting this exemption because their setback requirements are not met within the SR-1 development requirements. This goes outside the intended use of the planned development status. This is an unprecedented use of the planned development exemption, and should summarily be denied.

Other important facts are:

The ramifications of the proposal are significant and problematic:

-there will be at least a **doubling in automotive traffic** from 22 vehicles (2 vehicles for each home) to 50 vehicles (2 vehicles for each single family home (36) PLUS 1 vehicle for each ADU (14)).

This presents significant wear and tear on the already decrepit streets in the area and risks vehicle v. pedestrian accidents (aside: we are especially concerned with the increased vehicles hitting children walking to Ensign Elementary School just down the street). Even though the current Ivory proposal has added a few parking spaces, this does not permit all vehicles to park off street (ADUs will not have a garage – and will need to park on the street in many cases). Public transportation is limited (in both number of options -the #11 bus – and time of operation (business hours only M-Fr).

- there will be **minimal green space** due to setback and high density of new structures.
- there will be substantial use of **high and wide retaining walls** which will be a predominant focal point for the area. While it is true that many homes in the area are faced with sloped lots, due to the 12,000sf lots they are able to average the slope change over a much wider area. Very few homes use large, bulky, slab-sided retaining walls but instead work in more shallow changes using natural landscaping et cetera.
- limited sidewalks** (all other streets in the area have a sidewalk on at least one if not both sides of the street).
- with the **COVID-19 pandemic** many families are seeking **single family homes with ample yards and space between neighbors** to increase the distance between strangers. This is easily satisfied in the current FR-3 zone, but the proposed SR-1 with ADUs makes this much more difficult.

This area of the Avenues is unique in that it is surrounded but mostly single family homes or *historic* multi-use condominiums (read: The Meridien). The proposed **zoning change would allow for almost 3 times the number of residences than are currently allowed.** This **drastically changes the character** of this portion of the Avenues, as well as the greater Avenues community. Changing the zoning to SR-1 would *increase* the density much more than the existing (empty) piece of land or existing zoning (FR-3). To the west, on Caring Cove, Charity Cove, and Red Brick Court, there are no more than 14 single-family homes on a parcel larger than the current parcel, and each home has its own yards, most have sidewalks, and all have ample off-street parking in garages. To the south of this proposed lot is the Meridien, a very high density 5 story building of arguably the highest end condominiums in the city. Moreover, at over 110 year old the structure is historic and its façade has remained unaltered from the day it was opened in 1906. The development of the Meridien was meticulously planned to the highest of standards *so as not to change the existing character and structures already present.* Switching it from a hospital, which it served in its prior state, to condominiums *decreased* the overall impact of the building (less people with less vehicular and pedestrian traffic because there are less condominium residences than hospital rooms). Simply stated, **there is no precedent for this zoning change**, and it would bring irreparable changes to the area.

Lastly, **approving this rezone request would go against the thousands of signatures of Avenue's residents who oppose the rezone.**

In summary, we write this letter not to represent our opposition to developing SLC Parcel Number 09304550210000. Rather, we are strongly opposed to changing the zoning from a single-family residential situation with generous 12,000sf lots to **compact 5,000sf lots housing more people in areas with limited greenspace and small setbacks.** The current plot is a vacant lot, is zoned for single-family type homes, and should remain this way.

I strongly urge you to deny this petition to change from the existing zoning.

Thank you for your time and interest. We eagerly await your decision and look forward to warmly welcoming our new neighbors to the community.

Sincerely,
Jessica Wiley and Anthony Schaeffer

Echeverria, Daniel

From: Charles Cannon <[REDACTED]>
Sent: Monday, January 10, 2022 11:38 AM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Opposition to Rezone from FR-3 to SR-1 at 675 North F Street 84103

We object to the Ivory Homes request for rezoning on F Street. The proposed density violates neighborhood practice and will add dangerous increases in traffic on residential streets. We favor continuing adherence to Master Plans and existing zoning regulations. We moved to the Avenues six years ago to enjoy the relative lack of substantial traffic and the natural surroundings protected by appropriate regulation. The environmental degradation that would follow the approval of this rezoning application is inconsistent with the long-standing character of the neighborhood. Please protect the regulatory frame-work that is supported by an overwhelming majority of those who live here. Thank you for carefully considering the interests of Avenues citizens and voters.

Charlie and Claudia Cannon
536 E. 13th Avenue

Echeverria, Daniel

From: David Grainger <[REDACTED]>
Sent: Monday, January 10, 2022 10:18 AM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) citizen comments on the development proposal for 675 N. F Street, Salt Lake City

To SLC Planning Commission and City Council:

I write to provide new comments on the on-going zoning and master plan amendments and development and preliminary subdivision plat proposed for the 19-lot residential development on 675 N. F Street by Ivory Homes and Peter Gamvroulas.

The suburban foothills Avenues area of SLC where this Ivory Homes proposal is planned has a variety of unique historic, environmental, and practical residential zoning and housing density considerations that make this proposal untenable and "counter-culture" to this valued SLC neighborhood. It is my understanding that the SLC special exception code has recently changed for requesting such zoning, setback and other lot size changes contained in this Ivory Homes proposal (see http://slcdocs.com/council/agendas/AdministrativeTransmittal/2021/PLNPCM2020_00606SpecialExceptionTextChanges.pdf)

How is this special exception process now considered under the new SLC policy?

Secondly,

1. Planned amending the Avenues Community Master plan is over-reach from a commercial for-profit builder with little interest evident in how this residential building proposal adversely impacts the Avenues. Local residents should be capable of making best decisions via the Master Planning process.
2. Non-conforming setbacks, lot building coverage and lot sizes are non-conforming. None of the 19 lots have conforming setback; 6 lots fail to meet the minimum lot sizes for SR-1 zoning. The requested exceptions to long-standing SR-1 lot sizes and setbacks are unprecedented, unsuited and unjustified for this location.
3. the 300% household density increase now proposed for exception over the builder's prior FR-3 proposal and addition of ADUs is highly inappropriate, without precedent and unsuited to this neighborhood and to the Avenues' historic character, and averse to it's Master Plan.

My Avenues family is opposed to this building proposal and all the exceptions entailed in its consideration. The Ivory Homes proposal both practically and in principle runs counter to everything the Avenues neighborhood represents and is trying to achieve in its Master Plan. Approval of this proposal is a slap in the face to citizen governance, precedent and process to best achieve both appealing and safe residential SLC neighborhoods.

Respectfully,

David Grainger
535 8th Avenue
SLC 84103

Concerned citizen, taxpayer and voter

Echeverria, Daniel

From: Ruth Ann Hamilton <[REDACTED]>
Sent: Sunday, January 9, 2022 6:55 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Home Development Rezone request for Avenues property

Dear Planning Commission,

I am asking you to deny Ivory Homes petition to rezone the property located at 675 North F Street from a low-density zone to one of the highest if not the highest density zone permitted in the Avenues. If Ivory's petition is granted, it will negatively impact the quiet, charming, and family friendly neighborhood currently surrounding this property which many of us who live close to this property enjoy. In addition to changing the character of the neighborhood, a zone change will substantially increase traffic on the narrow roads around the property endangering school children who use these roads to get to school. Unlike the Meridian and Northpoint condominiums, which are near this property and have an excess of off-street parking for their residents and guests, Ivory's plan has insufficient onsite parking for its residents and guests. Moreover, Ivory's plan has made no parking allowances for the additional ADUs incorporated into their proposed plan. As you know, many of these ADU's will be used as Airbnb's, in law apartments, or rented out with at least one accompanying car and the main house occupied by a couple/family will most likely have two cars. Because there is not enough onsite parking to allow for this number of cars, several of these cars will have to park on the narrow public roads thereby further deteriorating the character of and traffic in our neighborhood but more importantly making it difficult if not impossible for snowplows to maneuver. A lack of parking spaces may be permissible in areas where there is adequate public transportation and cars are optional. But this situation does not exist in the upper Avenues – one needs a car to get around.

I have been told that Ivory Homes is a reputable, high-quality builder and has a strong political presence. I have nothing against Ivory Homes and find attractive many of their developments, but in this case this development does not belong in the upper Avenues. Please don't let profit out way the uniqueness of life the diverse residents of the Avenues enjoy. I have lived in many places both outside and inside the U.S., and the character and architecture of the Avenues neighborhood is a Salt Lake City jewel. Please don't tarnish this jewel.

Thank you for your consideration of my request.

Ruth Ann Hamilton
385 East 12th Avenue

Echeverria, Daniel

From: Patsy Johnson <[REDACTED]>
Sent: Sunday, January 9, 2022 5:48 PM
To: Echeverria, Daniel
Cc: Wharton, Chris
Subject: (EXTERNAL) Capitol Park Cottages, 675 N. F Street

Dear Sirs:

My husband and I have done due diligence on the proposal to rezone the property at 675 N. F Street from FR-3 to SR-1 to create additional lots, adding 14 Accessory Dwelling Units, relaxation of SR-1 requirements in lot size, setbacks, and lot building coverage, and making an amendment to the Avenues Community Master Plan to allow the rezone.

We visited Ivory Homes prototype, The Pines at 310 E. 7800 South, at 3:00 PM Friday afternoon, January 7, 2022. A salesperson was not there, so we walked around the 3 homes and property. We also looked at Ivory Homes Capito Park website, which did not contain an interior architectural floor plan of the homes.

The first thing we noticed at The Pines was the large amount of concrete, which provided parking for 3 cars for each unit with Accessory Dwelling. This provision means that there is a potential for 42 cars for the 14 cottage-lots and 10 cars for the five custom homes. That adds up to 52 vehicles for the existing 3.2-acre lot, which number of cars would adversely affect traffic on F Street and the Avenues, where we have lived for 52 years. This density of automobiles is horrifying.

The next thing we noticed was the hugely oversized footprint of multi-generational 11 cottage buildings with twin front doors, one door of which is hidden by a one car garage. The 3 smaller cottage buildings are very vertical, whose stairs would not be easy for a targeted, elderly empty nester. The squished together homes lack privacy and green space, because The Pines prototypes used rock-fill in place of grass. The potential for flash flood runoff is great, because of too much concrete and rock landscaping. Ivory plans to ameliorate this problem with unsightly retaining walls. Because of the density of the new proposed plan and rezone, all the ancient trees will be removed, which we admire when we walk on Capitol Park Avenue and 13th Avenue. Our lives will be endangered by new car traffic on 13th Avenue, potentially from students renting the Accessory Dwelling units.

Lastly, these cottages will not appeal to permanent owners, which will change the character of the Avenues. Even though Ivory Homes proposes to build brick exteriors on the cottages, it will not put "lipstick on a pig". The floor plan for the great room kitchen, dining area, and living area is small. The Cottages will be transient first time home owners, who will both need to work and rent the Accessory Dwelling in order to cover the cost of the home.

The Avenues is currently a desirable location to live with access to the University of Utah, the Madeline Choir School, and downtown. Please do not rezone the property at 675 F Street from FR-3 to SR-1, nor allow 14 Accessory Dwelling units with a potential for 5 more ADs on the custom homes. Please do not relax the requirements for lot size, setbacks, and lot building coverage, nor allow an amendment to the Avenues Community Master Plan, which the Greater Avenues Community Council has worked so hard to keep in force through the years.

Respectfully,

Ramon E. Johnson

Patsy O. Johnson
527 E. 11th Avenue
Salt Lake City, Utah 84103

telephone: [REDACTED]

Echeverria, Daniel

From: William King <[REDACTED]>
Sent: Sunday, January 9, 2022 2:39 PM
To: Wharton, Chris; Echeverria, Daniel; [REDACTED]
Subject: (EXTERNAL) Opposing to rezone large open space at top of "F" Street

I live in the Avenues and oppose the request to rezone the large open space at the top of F street. Some of my reasons are that the increase in traffic will be too much for that small area. We love the Red Tailed hawks that nest in the empty space in the pine trees. We have been walking in that area since 1996 with our dogs. The trees will have to be cut down with the rezoning plans which the hawks have lived in for many, many years. I was also told that there will be an issue with emergency vehicles and will have trouble with accessing the Avenues.

Please consider my concerns if you want my vote for you in the future.

Thank you,
William King

Echeverria, Daniel

From: Kim King <[REDACTED]>
Sent: Sunday, January 9, 2022 12:55 PM
To: Wharton, Chris; Echeverria, Daniel; [REDACTED]
Subject: (EXTERNAL) NO to re-zoning at the top of F Street

We oppose the Ivory homes rezoning at the top of F Street. Due to the traffic increase, the fire department said emergency vehicles will not be able to access the upper avenues safely, the red tailed hawks nest in the trees and the trees will not be able to be saved. We do not oppose properly-zoned new housing, but do oppose Ivory homes requesting to improperly increase the density of the space.

Thank you,
Pat King
[REDACTED]

Echeverria, Daniel

From: Liz McClane <[REDACTED]>
Sent: Sunday, January 9, 2022 11:50 AM
To: Echeverria, Daniel
Cc: Wharton, Chris
Subject: (EXTERNAL) Ivory Homes rezone request -Capitol Park Cottages

To whom it may concern;

I am writing to let you know that I strongly oppose the Ivory Homes request to rezone the open space area at the top of F St. from FR-3 to SR-1.

As a long term resident of the Avenues, I value the unique characteristics of our wonderfully diverse, eclectic neighborhood and am very concerned at the impact this proposed over development of the above mentioned parcel will have on the entire Avenues. Not only will it create unmanageable traffic congestion in the immediate area, but it will negatively affect the entire western avenues.

Additionally, I am concerned that due to the proximity of this parcel to nearby City Creek Canyon (and all the wildlife that lives in the canyon), that overbuilding in this area will negatively impact the fauna in this area. There are numerous red-tailed hawks that have for years nested in the remaining trees on this parcel and if 33 housing units are built in a space zoned for 11 units there is no possibility for these trees and by extension the hawks nests to be saved.

In closing, I do not oppose properly zoned new housing; but I strongly oppose Ivory Homes request to improperly increase the density of this space.

Liz McClane

Sent from my iPad

Echeverria, Daniel

From: ruthieand <[REDACTED]>
Sent: Sunday, January 9, 2022 10:11 AM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) NO IVORY HOMES RE-ZONE!

I am 100% against Ivory Homes' request to smash 33 new dwellings into an area that is currently not zoned for that level of density. Their new request for additional concessions makes their plan even worse for the Avenues than it was before. Zoning laws are created to preserve the quality and uniform integrity of an area. Why are they voted upon and approved if a rich developer can sway politicians to disregard them? Why would the Council grant Ivory an amendment to the Avenues Community Master Plan that has wisely guided development in the Upper Avenues for quite some time now?

The Pines is a perfect location for a high-density residential project. 7800 South is a four+ lane major East/West artery already in place with quick access to several freeway onramps. Comparing Ivory's success there to what they want to do in the Avenues is absurd. The Avenues has no infrastructure in place to handle what can only be described as over development for the area. The high-density impact of The Pines is not smashed in the middle of an already established neighborhood. In addition, these homes do not fit the definition of "affordability" in Salt Lake County. Although small, they will be priced way over and above the average sales price reflected in County data making the price/sq ft shockingly high and affordable only to people with incomes substantially higher than the County average. The proposed project does nothing to aid our County's dire housing affordability problem.

The fact that Ivory has now actually purchased the land and taken title means they must be willing to build on this land regardless of getting Council approval for 33 dwellings. Let's let Ivory build homes there according to current zoning laws. They're obviously willing to do so.

Ruth Andersen
543 Cambridge Circle
[REDACTED]

Echeverria, Daniel

From: Robin Pratt <[REDACTED]>
Sent: Sunday, January 9, 2022 9:38 AM
To: Wharton, Chris; Echeverria, Daniel; [REDACTED]
Subject: (EXTERNAL) No re-zone

Dear Councilman Wharton,

I have been a resident in the Avenues for almost 30 years, and enjoy walking throughout the neighborhood because it is quiet. Although traffic has increased over time on the main streets, it's still peaceful enough to either enjoy the sounds of birds, or to hear my audiobooks through my earbuds on my regular walks. But that is already changing on streets like 11th Avenue, E Street, and I Street.

I strongly oppose the Ivory Homes request to redone the open space area at the top of F Street from FR-3 to SR-1. The density will cause unmanageable traffic in the area, affecting the entire western avenues. The fire department has said emergency vehicles will not be able to access the upper avenues safely. Red-tailed hawks nest in trees in that space, and if 33 units are built in a space zoned for 11, the trees cannot be saved. I do not oppose properly zoned new housing; I oppose Ivory Homes' request to improperly increase density of the space.

Please help us preserve the quality of our gem of a neighborhood!

Thank you,

Robin and Greg Pratt
478 H St, Salt Lake City, UT 84103

--

Robin Pratt
[REDACTED]

Echeverria, Daniel

From: Carrie McGregor <[REDACTED]>
Sent: Sunday, January 9, 2022 7:33 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Rezone

Hello,

I have been a resident of the Avenues Ensign area for over 50 years and seen many changes during this time.

I very much oppose the rezone for the property at 675 F Street. We have zoning for a reason and it is unfair to us taxpayers to see the nice things about our neighborhood being chopped away by big money companies that will not be here to see the problems they will leave us with.

We simply do not have room for the density they want in this area.

Cookie cutter packed neighborhoods can be found anywhere. We pay high taxes to live here because it is unique. Please do not let this rezone go through. Traffic, pollution and wait times at south temple are already a problem and with the new Hardin Apartments starting to fill, we will see even more people in our neighborhood.

Please don't sacrifice us and our neighborhood for profit.

Best regards

C McGregor
411 10th Ave
SLC, 84103

Sent from my iPhone

Echeverria, Daniel

From: Rosemary Quatrale <[REDACTED]>
Sent: Saturday, January 8, 2022 6:59 PM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) No Ivory Holmes in the Avenues

I wanted to inform you that my husband and I strongly oppose the proposed Ivory Homes development in the upper Avenues. We have lived at 8th Avenue and K Street for 30 years and love it here. While this development is not in our immediate area we feel that it will negatively impact the whole neighborhood. We love the eclectic nature of our neighborhood and the unique homes. The proposed development is not in keeping with the tradition and character of our neighborhood. The increase in traffic and lack of parking will place a burden upon the neighbors and surrounding area.

Thank you,
Rosemary Quatrale
713 8th Avenue

Echeverria, Daniel

From: Elena James <[REDACTED]>
Sent: Saturday, January 8, 2022 3:33 PM
To: [REDACTED] Wharton, Chris; Echeverria, Daniel
Subject: (EXTERNAL) 675 North F Street Ivory Home proposed development

I live in the Avenues between E and F Street and vote NO to the previous and current proposal for development of Ivory Homes on 675 North F Street. These developments are too large and unsightly, they block views from above both in homes and trails and would create too much traffic for this small unique neighborhood.

Thank you,
Elena James

--

Sent from Gmail Mobile

Echeverria, Daniel

From: Gayle Stewart <[REDACTED]>
Sent: Saturday, January 8, 2022 2:44 PM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) " NO" to the Ivory Homes Avenues Proposal

I oppose the previous and current concessions that Ivory Homes have requested for their proposed housing development at the 675 North F Street site. This proposed development is too dense for the area and will also cause too much traffic.

Thank you.

Gayle M Stewart
498 East 11th Avenue.

Echeverria, Daniel

From: Barbara Miller <[REDACTED]>
Sent: Saturday, January 8, 2022 12:58 PM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) Ivory Homes F St Rezone

I want to state my opposition to the revised rezone proposal for 675 N F St. The overly dense development will strain the existing infrastructure and do nothing to address the affordable housing crisis in this city. As a resident on 13th Avenue, I know that basement apartments in this neighborhood rent for more than \$1,200.00/month.

When I worked in the downtown area a few years ago, I looked into public transport. It took too long and was not practical. I am a hiker, but walking to stores and restaurants is also not practical, due to distance and to the steep hills in this section of the Avenues.

This land should be developed under existing zoning regulations.

Barbara Miller
863 13th Avenue
Salt Lake City, UT 84103

Echeverria, Daniel

From: Alisha Giles <[REDACTED]>
Sent: Saturday, January 8, 2022 11:55 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Opposition to Proposed Re-Zone at 675 North F Street

Dear Mr. Echeverria,

I'm opposed to the proposed Re-Zone at 675 North F Street rezone. I live on F Street and I'm concerned about the increased traffic load and the impact it will have on the neighborhood and property values. I recently moved to the avenues about two years ago after looking for a home in the avenues for over a year. I love the community feel of walking around the avenues and I'm afraid that the increased traffic, especially on E and F street, will create noise and make it difficult to safely cross the street. This may sound trite but busy roads not only decrease the safety for the residents but also make the homes less desirable for resale. Finally, I don't think that the plan provides the affordable housing the city that would warrant a variance in zoning to the detriment of current residents. Please contact me if you have any questions.

Sincerely,

Alisha Giles
238 F Street
Salt Lake City, Utah 84103
[REDACTED]

Sent from [Mail](#) for Windows

Echeverria, Daniel

From: Marilyn Neilson <[REDACTED]>
Sent: Friday, January 7, 2022 6:33 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Rezone of Avenues

Dear Daniel, This is to urgently petition the Council to dismiss the Ivory application for rezoning of the Avenues. For every ecological issue of fire concerns, high retaining walls in earthquake zones, heavy traffic during especially wintertime on slippery steep hills, water usage, noise pollution with canyon recreation, multiple cars needed as there are no nearby services, destroying the habitat of wildlife, Etc etc. The invasion of such density is out of sync with the neighborhood and there are many places in the City that would serve the home purchasers better and a more appropriate environment for affordable housing units. Please hear the pleas of all Avenue's residents. We don't want density and retaining walls and ADU's in a residential neighborhood.

Thank you, Marilyn Neilson

Marilyn Neilson

Echeverria, Daniel

From: Cindy Cannon <[REDACTED]>
Sent: Friday, January 7, 2022 5:19 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes request for Re-Zone 675 F Street

To: Daniel Echeverria
Planning Division, Salt Lake City

From: Cynthia Cannon
832 Northcliffe Drive
SLC, UT 84103

Re: Ivory Home Application to Re-zone 675 F Street

Salt Lake City needs to deny Ivory homes their request for a zoning change in the Upper Avenues. This zoning change is unnecessary and, in fact, detrimental for many reasons:

1. This property demands a lower density due to its location in a steeply-sloped urban-wild land interface (for all the reasons inherent to that type of land). The current FR-3 zoning is in place exactly for this reason.
2. The proposal (as with their previous iterations) is environmentally irresponsible given its reliance on massive retaining walls, excessive hardscape and removal of all existing mature trees.
3. The built-in ADU model by a developer is unprecedented and represents a flagrant misuse of zoning change requests.
4. The claim that Ivory Homes is helping with our city's affordable housing crisis with this project is offensive and disingenuous.
5. There exist serious concerns regarding fire and fire management in this location with their current proposal, which potentially threatens an even larger portion of the neighborhood.

I could go on and on.

The solution is simple: Ivory Homes needs to work within the confines of the current zoning or sell the land to one who will respect the existing and appropriate constraints.

Echeverria, Daniel

From: Jeff Burton <[REDACTED]>
Sent: Friday, January 7, 2022 3:41 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Re: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

To Whom it May Concern

Re: Ivory Homes proposed change to zoning on 13th Avenue and F Street

I am totally opposed to their latest proposal.

It will cause a lot of traffic on F Street, parking will be horrible, fire engines will have trouble getting to homes in the surrounding areas, the historical legacy of the VA hospital and its surroundings will be ruined, it will create a new and dangerous fire hazard, there will be a lot noise, and so forth.

Please don't change the zoning for this area.

Thanks.

D. Jeff Burton

791 Northpoint Drive

On Mon, Nov 29, 2021 at 4:47 PM Echeverria, Daniel <[REDACTED]> wrote:

A small clarification on the below notice e-mail - The lots proposed along F Street (Lots 1 to 5) are proposed to be custom homes and so may or may not ultimately include an accessory dwelling unit. Each single-family home accessed from the internal private street (Lots 6 to 19) is proposed to include an internal accessory dwelling unit when built.

DANIEL ECHEVERRIA

Senior Planner

Planning Division

DEPARTMENT *of* COMMUNITY *and* NEIGHBORHOODS

SALT LAKE CITY CORPORATION

TEL [REDACTED]

EMAIL [REDACTED]

www.SLC.GOV/PLANNING

Echeverria, Daniel

From: Rob Becker <[REDACTED]>
Sent: Thursday, January 6, 2022 8:42 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) New Ivory Rezone and Planned Development Application for 675 N. F Street

Daniel:

Good evening and thank you for your time. I am sending my public comment related to the currently proposed Ivory Development Plan for 675 N. F Street. The proposal and the requested zoning changes do not seem appropriate to maintain the character of the Avenues residential area. The density, number of units, additional traffic burden, and general approach do not align with maintaining the historic district and surrounding neighborhoods. The current zoning requirements allowing 11 homes with appropriate lot set-backs and spacing seems sufficient and appropriate given the surrounding area.

I am strongly against modifications to existing zoning.

Thank you,
Robert Becker
501 E 4th Ave

Echeverria, Daniel

From: pat richards <[REDACTED]>
Sent: Thursday, January 6, 2022 7:54 PM
To: Echeverria, Daniel
Cc: joe beaumont; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) RE: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

Dear Mr. Echeverria,

Thank you for the update and the information below. My husband (Joe Beaumont) and I had an opportunity to participate in the Greater Avenues Community Council (GACC) meeting last evening. We both appreciated your very clear and concise overview of the revised application from Ivory Homes regarding development of this property and the next steps in the process.

I'd like to start by noting that we do NOT have any concerns about developing the property and/or including Accessory Dwelling Units under the **existing** FR-3 zoning requirements.

We do, however, have grave concerns about the proposed re-zoning (to SR-1), and making changes to the Master Plan Amendments and the Future Land Use Map.

The density of the proposed development is **not consistent with the character** of the surrounding neighborhood.

The proposal would require changing the current density designation (very low density) as specified in the Future Land Use Map to either "low" or "moderate" density. This change in density would have an adverse impact on the existing neighborhood.

There also appears to be a **significant safety issue** regarding lack of ability of fire trucks to access all of the homes. Due to the high density of the proposed development, units 6,7, and 11 do not have a street wide enough to accommodate a fire truck in case of an emergency. These units have only a 16 foot wide shared driveway. The private road offers only one way in and one way out that could hinder not only fire trucks, but also other emergency vehicles.

The applicant is also seeking modifications to the dimensional and lot standards through the **Planned Development process**. This approach is questionable in that it is not clear how the proposed project would meet the requirements of a Planned Development (e.g. provide an overall benefit to the community, result in a more enhanced product, and be compatible with adjacent and nearby land developments).

Lastly, the builder has described (in their application) that this proposal is a "demonstration project of sorts". If this is to be considered some type of "demonstration project" it would be most helpful for the builder to be required to describe how the success of the "project" would be measured and monitored, and how long it would take to confirm if the "project" had met its stated goals. It may be more appropriate to conduct the "demonstration project" in conjunction with an academic center or neighborhood re-development agency in a location that has expressed interest in this type of project.

Thank you for your consideration. Please feel free to contact Joe or me if you have any questions.

Sincerely,

Patricia R. Richards
Joseph E. Beaumont

Echeverria, Daniel

From: [REDACTED]
Sent: Thursday, January 6, 2022 4:58 PM
To: Echeverria, Daniel
Cc: Wharton, Chris
Subject: (EXTERNAL) Opposition to Ivory Homes Rezone

Dear Mr. Echeverria

We are writing to oppose the **Ivory Homes** proposed development of the land near the top of F Street above 13th Ave in SLC.

The proposed development is far too dense and out of character for that area. We do not understand why Ivory cannot instead build a nice development with far less congestion that is more acceptable to neighbors. Just because a building site becomes available does not mean a developer should be able to swoop in to maximize profit at the expense of neighbors who have enjoyed this area for decades, especially when a rezone is required. The proposal will turn this area into one of high congestion that is visually unappealing and incompatible with the surroundings. Better options are available that should be acceptable to all.

Sincerely,

Vernon and Loretta Rice, 817 Northpoint Drive, Salt Lake City

My name is Cindy van Klaveren and I have lived in Northpoint Estates for 12 years. Although I have several reasons for my opposition to the proposed zoning change, this letter will concentrate on the topic of excess cars that I believe a rezoning would produce. The best estimate of resident cars with the zoning change is 70. Those same 70 cars will rain down on the already overly crowded lower avenue streets as people daily exit their homes. The 11 homes allowed under the current zoning might bring 22 or substantially fewer cars. Even if you can fit all 70 of those cars inside garages, what about guest parking? Will Ivory have an open mind and learn from the real-life experiences of an almost 40-year-old adjacent property?

The original plot maps of Northpoint show 29 guest Parking spots. Archival HOA meeting minutes from the mid-80's, document repeated requests for more guest parking spots. In response, the developer added 6 more, for a total of 35 current guest spots for our 49 units or .71 guest spots per unit. Every home has a 2-car garage and 2-car driveway, but we always seem to run short of Guest Parking spaces for visitors, vendors, repair trucks, home health, family holiday celebrations, and the ubiquitous home deliveries.

The Fire Marshal prohibits street parking due to our narrow roads which are approximately the same 26-foot width as the Ivory enclave road design. Fire Captain Scott Winkler has assured me that the Ivory project is subject to the same restrictions as Northpoint. Consequently, even if the Ivory project's initial drawings show 12 enclave street guest parking spots, they will ultimately not be allowed under current fire codes.

New Ivory drawings have eliminated the street parking, replacing them with 4 guest parking spots or .12 per unit. To match the time-tested guest parking ratios of Northpoint, Ivory is short 19 guest parking spaces. Past experience at Northpoint would say that 4 guest parking stalls for 33 units are woefully inadequate. Capitol Park Avenue doesn't allow street parking, so the only place for these estimated surplus cars to park is "F" Street, Caring Cove, or other surrounding streets.

Recently, a commercial for Nordic Track was filmed in a home on "F" Street near the Meridien entrance. During the 3 days of filming, I attempted to count the excess cars of cast and crew. I monitored some additional 30-35 cars parked on "F" Street, 11th and 13th Avenues. "F" Street quickly became one lane. At times, the film crew designated a flag person to aid congestion. People who are frequent walkers of the upper avenues are able to distinguish the regular parked cars from the film project cars. The production parking cones were also a verification. That temporary event gave me a clue as to what we might be facing permanently, if Ivory is allowed to change the zoning and bring in many more cars to their project.

School children living within this proposed project will soon determine the quickest path to the bus stop. Jumping fences, cutting through yards, and darting out between parked cars on "F" Street may create additional challenges for Northpoint drivers entering and exiting "F" Street. Steep grades and winter ice will add to the dangers.

Progress comes at a cost. We all may grumble at the inconvenience of construction, but that is temporary. However, if the zoning is changed to allow 70 or more cars into this area, negative consequences will be permanent.

I will ultimately be delighted to welcome new homes and families to this area. I remain hopeful that elected officials will listen to the residents they represent, maintain the zoning for 11 homes, protect our fragile foothills against over development, limit the number of additional cars, and pave the way for neighborhoods to peacefully coexist.

Respectfully,

Cindy van Klaveren

Sources:

Mimi Davis, Film Location and Transportation Management Coordinator

Northpoint Estates Condominiums Archived HOA Meeting Minutes

Echeverria, Daniel

From: amber fitzsimmons <[REDACTED]>
Sent: Thursday, January 6, 2022 3:11 PM
To: Wharton, Chris; Echeverria, Daniel; [REDACTED]
Subject: (EXTERNAL) NO IVORY REZONE IN THE AVENUES

Dear Mr. Wharton and Mr. Echeverria,

As a homeowner at 133 P Street, I strongly oppose the Ivory Homes request to rezone the open space area at the top of F street (685 N F street) from FR-3 to SR-1. The density will cause unmanageable traffic in the area, not to mention the entire avenues. The Fire Department has said emergency vehicles will not be able to access the upper avenues safely. Not to mention all the "near miss" traffic accidents that routinely happen due to current congestion!

On a Utah conservation note, the Red-tailed hawks nest in the trees in that space and if 33 units are built in a space zoned for 11, the trees will undoubtedly be cut down and destroyed.

To be clear: I do not oppose properly zoned new housing; however, I oppose IVORY HOMES request to IMPROPERLY increase the density of the space.

And, on a final note, I do not support the statement that UT needs more affordable housing and the properties going in on F street will help. Million dollar homes do not help "affordable housing" issues.

If Ivory homes is invested in increasing housing--they should choose a site that can support their required density. The open space at the top of F street is definitely NOT the area to select for the multitude of reasons noted above.

Sincerely,
Amber Fitzsimmons
Assoc Professor and Chair

Echeverria, Daniel

From: Scott Young <[REDACTED]>
Sent: Thursday, January 6, 2022 1:06 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED] Scott Young
Subject: (EXTERNAL) Opposition to Ivory's Rezoning Requests regarding the 675 North F Street Property
Attachments: Letter Opposing Ivory's Petition for Changes to Zoning, Master Plan, etc 010622 signed.pdf

Mr. Echeverria,

I appreciated you taking the time to attend the GACC zoom meeting last night and to provide insights into the rezoning process. I have attached my letter opposing Ivory's rezoning requests. Ivory's requests are not appropriate for our neighborhood, are not fair in light of Salt Lake City's restrictions on the surrounding properties, and are not consistent with Salt Lake City's long-held historical positions. Accordingly, I and my family respectfully request that the City deny Ivory's requests and require Ivory to comply with the existing zoning requirements. I appreciate your time. Thanks and stay safe.

Scott F. Young
Chief Operating Officer



201 S. Main St. Suite 1400
Salt Lake City, Utah 84111

mobile [REDACTED]
office [REDACTED]

www.sentry.financial
[linkedin.com/in/scott-f-young](https://www.linkedin.com/in/scott-f-young)

Scott F. Young
322 East Penny Parade Drive
Salt Lake City, Utah 84103

January 6, 2022

Via email [REDACTED]
Mr. Daniel Echeverria
Senior Planner
Salt Lake City Planning Division

Re: Opposition to Ivory's Requests for a Zoning Map Amendment, a Master Plan Amendment, and a Planned Development Approval (the "Rezoning Changes") for the 3.2 acre lot located at 675 North F Street Property ("F Street Property")

Dear Mr. Echeverria,

My wife and I bought our home in the Capitol Park neighborhood in 2015, in large part on the ambience and character of the neighborhood. The Capitol Park neighborhood is on the western boundary of Ivory's F Street Property and also surrounds the Meridien and the Annex properties, which are across the street to the south of Ivory's F Street Property and are former Primary Children's hospital properties.

I am writing this letter in opposition to Ivory's ever-changing and expanding requests for the Rezoning Changes. I and over 2,100 of our Avenues' neighbors are extremely concerned about the high-density development that Ivory seeks to build. To be clear, I do not oppose the development of the F Street Property consistent with the existing zoning requirements, nor am I opposed to accessory dwelling units ("ADUs"). But, I and my neighbors are adamantly opposed to Ivory's requested Rezoning Changes that will forever adversely impact our neighborhood in so many ways (including damaging our property values), all to facilitate Ivory's desire to cram 38 homes/ADUs onto 3.2 acres (12 units per acre) instead of the 22 homes/ADUs permitted under the current zoning.

Ivory recently bought the F Street Property with full knowledge of the current zoning requirements. The existing zoning permits Ivory to build 11 homes. The recent 2018 ADU ordinance allows Ivory to add an ADU to each home, which doubles the zoning density for the F Street Property from 11 to 22 homes/ADUs.

But, that's not enough for Ivory. Per Ivory's "Site Plans and Subdivision Plat"¹, Ivory wants to build at least 38 homes on the F Street Property (19 homes with 19 ADUs). To accomplish this, Ivory is seeking to reduce the current minimum lot size of 12,000 square feet to less than the 5,000 square feet minimum for SR-1. There is no space for greenways or wildlife corridors. The yards are the size of postage stamps, with almost no greenspace and Ivory plans just one token private (not public) open space. This is directly contrary to the objectives of the Master Plan and violates at least one of the criteria for a Planned Development approval. Then, Ivory plans to further decimate the neighborhood by planning to install monstrous **retaining walls of up to 14 feet tall**, running both north/south and east/west throughout the F Street Property.

Ivory simply wants the City to disregard all of the rules and plans that apply to everyone else. The Master Plan states "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 dwellings..." **The Master Plan clearly designates the F Street Property and surrounding area as "very low density housing"**. Ivory's proposal is directly contrary to all of these requirements!

So, why is Ivory asking for these accommodations? Despite Ivory's marketing, it is definitely not about affordable housing or using the ADUs as mother-in-law apartments. These are specious claims! Ivory's estimate in early 2021 was that each house would cost between **\$1 million to \$2 million or more** and each ADU will rent for **\$1,500 to \$2,000 or more** per month! These amounts are low because, among other things, construction costs and rental rates have significantly increased since then. Nevertheless, even

¹ On page 3 of Ivory's Site Plans and Subdivision Plat, Ivory's chart declares Ivory's real intent is for 2 units per lot with a footnote stating "**EACH LOT CONTAINS ONE PRIMARY UNIT AND ONE ADU**". Ivory's false narrative of only 19 homes with 14 ADUs is contrary to Ivory's Plans and is simply disingenuous. See: http://www.slcdocs.com/Planning/Online%20Open%20Houses/2021/11_2021/Capitol%20Park%20Cottages/3.%20Site%20and%20Plat%20Plans.pdf

Ivory's 2021 estimates are not "affordable" under local standards. The median household income of a SLC resident is \$45,883 a year. Even in Ivory's submission, Ivory states that for "High-Income Families" at 120-150% AMI, an affordable home is between \$300,000 and \$400,000. And **Ivory further states that "[a]ccess to transit can either be the key to housing stability or the component that creates instability." But, there is no easy access to public transportation from the F Street Property.** Moreover, the City will not be able to limit the use of the ADUs, which are more likely to be used as airbnbs or other short term rentals.

Let's be honest – Ivory's Requested Changes are simply about Ivory trying to maximize its profits, regardless of the lasting adverse consequences to our neighborhood!

Our Capitol Park homeowners as well as other homeowners in the neighborhoods surrounding the F Street Property (including the Meridien, Northpoint Estates, F Street, 13th Avenue and the wider Avenues community) are adamantly opposed to Ivory's request to develop its high-density plans for the F Street Property. In fact, the results from the most recent vote conducted in 2021 by the Greater Avenues Community Council were 1,244 votes against Ivory's rezoning and 25 for Ivory. **Over 98% of Avenues residents are against Ivory's requested Rezoning Changes!**

Some historical background is also helpful. The Meridien and Annex properties, and portions of Capitol Park homeowners' properties were previously owned by Primary Children's Medical Center. When Primary Children's Medical Center announced it was relocating its facilities to the University of Utah and was going to sell its property, Salt Lake City and the Avenues' residents were understandably concerned that **"the scale, design and density of any new development will be low-density residential in nature."**

As a result, Salt Lake City imposed **30-year Restrictive Covenants** on the Primary Children's Property (including the Meridien and Annex properties). Those Restrictive Covenants expressly state the reasons for the restrictions, including:

"Avenues residents are concerned about ... what will happen when [Primary Children's Medical Center] vacate[s] the existing buildings."

"The question of what type of uses will replace [the Primary Children's Medical Center's property] is a major concern of Avenues residents and city officials."

"From the planning standpoint, land use at the [Primary Children's Medical Center's property] **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 [low-density] residential.**"

"A new use [of the Primary Children's Medical Center's property] should improve rather than worsen existing conditions."

"The primary concern at this location is that the scale, design, and density of any new development will be low density residential in nature."

The reasons for imposing requirements for low density housing articulated by Salt Lake City with respect to the Primary Children's Property are incredibly more compelling today. The F Street Property is still surrounded by existing low-density residential housing. The development that Ivory plans to build, if a zoning change is approved, would add approximately 75 additional automobiles that will daily utilize the Avenues' streets, which equates to a minimum of 122,000 additional trips a year. Yet, the Avenues' streets are still today "narrow residential streets traversing relatively steep topography."

Today, as then, our and the surrounding neighbors' primary concern is that the scale, design and density of the new development on the F Street Property be low-density, residential in nature as designated in the current FR-3 zoning and as would be consistent with the surrounding neighborhoods. Ivory's Requested Changes to allow a high-density development is no more compatible with the existing neighborhood today than it was when Salt Lake City imposed the Restrictive Covenants.

For many of the same reasons set forth above, under the 30-year Restrictive Covenants, Salt Lake City imposed restrictions on properties contiguous to the F Street Property.

The City restricted the Meridien property to a maximum of 29 units. In fact, the Meridien has only 26 units. The Meridien is located on a parcel of 3.44 acres (3.84 acres if you include Capitol Park Avenue). This equates to 7.56 units per acre.

The City also restricted the Annex property to a maximum of 7 units. The Annex property consists of 1.82 acres; this equates to 3.85 units per acre.

By comparison, under the current zoning, Ivory can build 11 homes plus 11 ADUs for a total of 22 units. The F Street Property consists of 3.2 acres. This equates to 6.88 units per acre, which is basically equivalent to the number of units per acre on the Meridien property and is almost double that of the units per acre on the Annex property.

But, under the Rezoning Changes, Ivory wants to build 38 homes/ADUs on the F Street Property, which is 11.88 units per acre. This is **a 173% increase** over the number of units per acre under the current zoning, **a 157% increase** over the number of units per acre on the Meridien property **and a 339% increase** over the number of units per acre on the Annex property. **This is not fair to the surrounding property owners that were restricted by the City!**


Salt Lake City recognized the essential character of our neighborhood and wisely restricted the density on the Meridien and the Annex properties. To allow Ivory to proceed with its high-density plans would be inequitable to the developers and homeowners of the Meridien and Annex and of Capitol Park. More importantly, it would undermine the care taken by Salt Lake City to prevent the move by Primary Children's Medical Center from destroying the ambience of our neighborhood. And, more distressing is that each homeowner in our neighborhood (including my family) bought his or her property and invested in our neighborhood in reliance on the residential character of the neighborhood and its low-density, residential zoning. **It is completely unfair to change the rules now.**

Ivory attempts to justify its Rezoning Changes by pointing to the Meridien and Annex buildings. There is no equivalence. The Meridien and Annex rezone was granted for the specific purpose of preserving two beautiful, neo-classical buildings listed on The National Register of Historic Places. The repurposing of these two buildings to condominiums in 2006 was widely welcomed by existing neighbors, in distinct contrast to the virtually unanimous opposition to Ivory's proposed development. It should also be noted that this redevelopment was done with great care to blend well with the existing, low density neighborhood, underground parking was established for all residents, and screened guest parking was provided above ground. The nature of these existing buildings has a lower footprint, allowing generous setbacks and landscaping again fitting in with the existing single family homes in the vicinity. Finally, Ivory proposes new construction -- not the repurposing of existing historical structures that are listed on The National Register of Historic Purposes.

In sum, Salt Lake City was understandably concerned that **"the scale, design and density of any new development will be low-density residential in nature."** and previously and accurately recognized, **"[a]ccess 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 [low-density] residential."** That assessment remains equally true today and should be enough alone to deny Ivory's request for the Rezoning Changes. That's why over 2,100 Avenues residents signed a petition opposing Ivory's Rezoning Changes and, at a recent GACC meeting, the attendees voted an overwhelming 1,244 in vehement opposition to Ivory's Rezoning Changes.

On behalf of our family, and Capitol Park and our Avenues' neighbors, my family respectfully requests that Salt Lake City firmly and unequivocally reject Ivory's request for Rezoning Changes and require Ivory to abide by the same rules and restrictions that affected the Meridien, the Annex, Capitol Park and the rest of the surrounding neighborhood. Ivory will still be able to develop the property under current zoning and will still make a sizeable profit.

Respectfully,


Scott F. Young

cc Chris Wharton, District 3 Salt Lake City Council

Preserve Our Avenues Coalition

Echeverria, Daniel

From: Judy_Joel Daly_Deaton <[REDACTED]>
Sent: Thursday, January 6, 2022 11:24 AM
To: Echeverria, Daniel
Cc: Mayor; Wharton, Chris; Judy_Joel Daly_Deaton; [REDACTED]
Subject: (EXTERNAL) Dr. Judy Daly Opposition to the Ivory Homes Rezone at 675 North F Street.
Attachments: Judy A. Daly Ivory Homes opposition letter 1-4-2022.docx

The attached letter outlines my opposition to the proposed rezone at 675 North F. Street. I am a resident of Northpoint condominiums.

Regards,

Dr. Judy A. Daly

Dr. Judy A. Daly
813 North Juniperpoint Drive
Salt Lake City, Utah 84103
January 4, 2022

Mr. Daniel Echeverria, Senior Planner
Salt Lake City Planning Division
[REDACTED]

Dear Mr. Echeverria;

As a resident of Northpoint Estates I am writing to express my opposition to Ivory Home's most recent proposal to rezone the property at 675 North F Street. The area is presently zoned F-3 and should not be changed as proposed in the re-zone proposal.

The proposed rezone is inappropriate for the area based on a variety of factors:

- Increased density of units
- Increased traffic and noise
- Adverse effect on the area aesthetic
- Increased need to terrace (scar) the property to accommodate the increased number of units
- Increased need to build terrace – retaining walls that could be problematic to neighboring properties by compromising the ingress and egress
- Rezoning of the properties would not of benefit to the community only to revenue for Ivory Homes
- The property is not within walking distance to shopping, dining, employment, etc. as is indicated in the proposed rezoning
- The proposal contains numerous misleading and inaccurate statements concerning the community, the geography, topography, business accessibility and availability of public transportation among others.

I respectfully request that the Planning Division and the City Council deny Ivory's request for rezoning.

Regards,

Dr. Judy A. Daly
Northpoint Estates Resident

Cc:
Mayor Erin Mendenhall
Chris Wharton, District 3 City Council



Echeverria, Daniel

From: Judy_Joel Daly_Deaton <[REDACTED]>
Sent: Thursday, January 6, 2022 11:18 AM
To: Echeverria, Daniel
Cc: Mayor; [REDACTED] Judy_Joel Daly_Deaton; [REDACTED]
Subject: (EXTERNAL) Joel Deaton letter in opposition of Ivory Homes Rezone at 675 North F Street - Northpoint Condominium homeowner opposition
Attachments: Joel Deaton Ivory Homes opposition letter 1-4-2022.docx

Please see attached letter opposing the rezone of Ivory Homes property at 675 North F. Street.

This letter is from me as a homeowner in Northpoint Condominiums.

Joel L. Deaton
813 North Juniperpoint Drive
Salt Lake City, Utah 84103
January 2, 2022

Mr. Daniel Echeverria, Senior Planner
Salt Lake City Planning Division
[REDACTED]

Dear Mr. Echeverria;

I am writing to express my opposition to Ivory Home's most recent proposal to rezone the property at 675 North F Street. The area is presently zoned F-3 and should not be changed as proposed in the re-zone proposal.

The proposed rezone is inappropriate for the area based on a variety of factors:

- Increased density of units
- Increased traffic and noise
- Adverse effect on the area aesthetic
- Increased need to terrace (scar) the property to accommodate the increased number of units
- Increased need to build terrace – retaining walls that could be problematic to neighboring properties by compromising the ingress and egress
- Rezoning of the properties would not of benefit to the community only to revenue for Ivory Homes
- The property is not within walking distance to shopping, dining, employment, etc. as is indicated in the proposed rezoning
- The proposal contains numerous misleading and inaccurate statements concerning the community, the geography, topography, business accessibility and availability of public transportation among others.

I respectfully request that the Planning Division and the City Council deny Ivory's request for rezoning.

Regards,

Joel L. Deaton
Northpoint Estates Resident

Cc:

Mayor Erin Mendenhall

Chris Wharton, District 3 City Council



Echeverria, Daniel

From: Judy_Joel Daly_Deaton <[REDACTED]>
Sent: Thursday, January 6, 2022 11:10 AM
To: Echeverria, Daniel
Cc: Mayor; Wharton, Chris; [REDACTED] Judy_Joel Daly_Deaton
Subject: (EXTERNAL) Opposition to Ivory Homes Rezone at 675 North F Street - Terracing - Scarring Concerns - from Joel Deaton Resident and Vice Chair of Northpoint Condominium Management Committee
Attachments: Letter concerning terracing 1-3-22 revised.docx

Please see the attached letter in opposition to the Ivory Homes rezone at 675 North F Street.

Regards,

Joel Deaton – Vice Chair of Northpoint Condominium Management Committee.

Joel L. Deaton
813 North Juniperpoint Drive
Salt Lake City, Utah 84103
January 2, 2022

Mr. Daniel Echeverria, Senior Planner
Salt Lake City Planning Division
[REDACTED]

Dear Mr. Echeverria;

I am writing to express my opposition to Ivory Home's most recent request to rezone the property at Capital Park Avenue and F Street. The address also known at 675 North F Street.

Among the residents of the Avenues and the residents of the area surrounding the proposed development there is strong opposition to the development recommended in the most recent proposal under review by SLC Planning Commission and ultimately by the Salt Lake City Council.

It is important to point out that there is no issue to the development of the property as it is currently zoned but there is strong opposition to the rezone requested by Ivory Homes. I understand the current zoning for this property is FR-3 which would allow for 11 lots on the 3.2 acre property. The Ivory Homes request would increase the number of lots to a much higher density and would be part of a rezone to SR-1 and planned development. I believe this is an inappropriate rezone based on the neighborhood, the proposed density of the homes, the increased traffic and congestion in the area. I also note that the request to rezone would also include ADUs as part of the project and the Ivory request for rezoning implies that the homes with pricing starting at \$1 million would qualify as "starter" or "affordable" housing for Salt Lake City.

A major concern for me as a homeowner and member of the Management Committee of Northpoint Condominiums relates to the use of retaining walls and terracing shown in the proposal. This terracing would

create significant “scarring” of the landscape within the property and most likely would not be required to the same extent if the FR-3 zone was maintained by Ivory Homes in the development of this property.

The retaining walls—terracing—scarring also create concerns for residents of Northpoint in that the plans indicate that the development, if rezoned, would require the construction of substantial retaining walls adjacent to Northpoint Drive, which is within the Northpoint Condominium grounds and is the only ingress and egress for the entire community. The concerns are multiple relating to the retaining walls as seen in the drawings.

The retaining walls adjacent to Northpoint Drive appear to be very close to the retaining wall constructed when Northpoint was built which supports Northpoint Drive. In the event of a collapse of the Northpoint wall due to infringement on that wall by the Ivory Homes retaining wall and construction, the residents of Northpoint would be trapped within the complex or outside of the complex. This would also be possible in the event of an earthquake which could add stress to the Northpoint retaining wall which may be affected by the retaining walls being proposed by Ivory Homes.

The retaining wall to be constructed by Ivory Homes would require specific engineering to “protect” the Northpoint retaining wall from collapse both during and post-construction and possibly during an earthquake. The ultimate concern is the undermining of the current retaining wall of Northpoint Drive. Northpoint Drive is used, not only by residents on a constant basis, but also by moving trucks, construction vehicles, delivery trucks and the like. Northpoint Condominiums would ask that the city thoroughly review this situation to ensure for the safety and well-being of Northpoint Drive and the residents of Northpoint Condominiums.

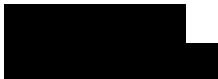
The terracing-retaining walls-scarring are of concern due to the wall heights that are suggested by the drawings. It appears that some of the retaining within the development may be as much as 12 to 13 feet and would require multiple terracing to achieve the needed height. I am also concerned how these terraces-retaining walls are to be considered in the setback requirements for buildings within the property. As I examine the drawings it appears that the setbacks may not be appropriate for the property and for the retaining walls.

The terraced retaining walls adjacent to the retaining wall at Northpoint Drive will create an inaccessible area or “no man’s land” between the two walls that would be a location which would fill with garbage, unkempt overgrowth, trees, vermin and wildlife. This situation would be problematic for residents of Northpoint and the Ivory Homes development.

Elevations between homes would not be as dramatic, retaining heights reduced, and scarring not as dramatic and unsightly if the original zoning is retained and the property were divided, as proposed earlier into 11 lots. With all of the above in mind, I request that the Planning Division and the City Council deny Ivory home’s request for rezoning and planned development.

Regards,

Joel Lowdermilk Deaton



Resident of Northpoint Condominiums and Vice-Chair Northpoint Management Committee

Cc;
Mayor Erin Mendenhall





Echeverria, Daniel

From: Julie and Rich Sanders <[REDACTED]>
Sent: Wednesday, January 5, 2022 10:28 PM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) Capitol Park Cottages

Good Morning,

I am writing to express my concerns regarding the potential Ivory Homes development on and around F street in the SLC Avenues.

I have several concerns:

1. Why have master plans and zoning if they are only to be amended? And amended in a spectacular fashion! This is quite a list of concessions that they would like the city to make. If granted, I fear you will be **setting precedents** for future developers. Who is to say if these exceptions are granted that the next time it will be mass housing in the foothills above the high avenues or above my home, in the foothills above Tomahawk? If granted, you are opening the door to other unwanted development.
2. There is **too much going on for 3.2 acre site**. The current master plan allows for less housing. I am concerned this, if approved, will end up as a huge expensive (not low income), uncared for rental community. You are looking at a private drive, a park, extra parking stalls and all the dwelling units on 3.2 acres. This is not attractive and realistic. Wasn't this development originally to have been affordable housing? There are many other sites in the state and county for this type of development. Why here? This type of development is not needed here in the Avenues.
3. This development is not being touted as a private community, but it will have a private drive, private park and private guest parking stalls. I assume there will be an HOA? What is the plan for that? I assume they will do their own road clearing etc? How does the city factor into that?
4. If the development is approved the traffic on 11th will increase. 11th is already busy. We don't need more traffic. It is difficult enough to navigate with all of the cars, bikes, walkers, and hikers.
5. This potential community, in my mind, will not fit and does not fit into the character of the Avenues. The Avenues area is a special historical, eclectic place. This development with its mass, crowded, housing, would be jammed into a small area. Even the apartments in the avenues have character. This development with 32 dwelling units (including ADUs) on 3.2 acres, will not have any character.

As you can tell, I am not in favor if this development. I think that Ivory Homes keeps coming back to the table to wear the city council down. What they are asking for is unreasonable, and not in the best interest of this community.

Thank you for listening,

Julie Sanders

Echeverria, Daniel

From: [REDACTED]
Sent: Wednesday, January 5, 2022 9:29 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Homes Rezoning for Capital Park Homes development

I wish to register my opposition to the request for rezoning from FR-3 to SR-1 by Ivory Homes at Capital Park Cottages. They will not comply with SR-1 zoning without having to modifying it further.

The property is not large enough to handle that many residences without making even further non conforming changes to SR-1.

Ivory homes is trying to overdevelop this property thus increasing the density of buildings, adding more people and increasing traffic in this neighborhood. Existing streets cannot handle ingress and egress from such an increase. I will personally be affected by increased traffic.

Terracing this area is also unacceptable. The rest of the Upper Avenues has been built on an incline without large scale retaining walls and terracing.

I also object to the amendment requested of the Avenues Community Master Plan. We have built our homes by that plan. There is no need for a change.

Ivory Homes should build the 11 homes there is space for and build high density housing elsewhere where it is zoned for such building.

I do not trust Ivory Homes because of dealing with them 16 years ago. Do not trust them to do what they say and be sure to read their contracts and fine print very carefully. Because of one single mistaken number in a contract we lost thousands of dollars and confidence in their integrity.

I think they should also change the name of the project. This is not Capital Hill! That is west across City Creek canyon. This area is known as the Avenues.

They are building in the avenues where I have lived for 47 years in four different homes. This development is 3 1/2 blocks from my home.

Sincerely,
Jo Dee Flindt
710 Northcrest Drive
Salt Lake City, Utah 84103

Echeverria, Daniel

From: Kevin Blalock <[REDACTED]>
Sent: Wednesday, January 5, 2022 8:45 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Capitol Cottages

Daniel – thought I would drop you a note re: the proposed “Capitol Cottages” project (also known as the “Ivory Rezone” proposal, I believe). As a long-time Avenues resident, *I am adamantly opposed to the project*. As a Salt Lake City architect and small business owner, *I am also adamantly opposed to the project*.

I have long been an advocate for revisions and updates to our current Zoning Ordinance. It is becoming increasingly challenging to create responsible development throughout the city, development which would help solve our growing housing challenges. Similarly, I am a strong advocate for incorporation of ADU’s throughout the city. In particular, we have some very large residential lots that are grossly underutilized.

In short, the City desperately needs to come up with a responsible solution addressing the antiquated Zoning Ordinance restrictions, and be inclusive of ADU’s. However, the project proposed by Ivory Homes is completely inappropriate and without merit. Further, this development should not be approved and become the vehicle for forcing revisions to the Ordinance. I would be happy to go into specific details about the lack of authenticity with the proposal, lack of thought and character with the housing solution, and overall lack of responsibility with the development. The information presented in the packet I have viewed is incomplete and misleading (at best) as to what the actual physical appearance and public experience will be. Please let me know if more specific details and information would be of benefit.

Best regards –

Kevin Blalock, AIA
Principal, Blalock & Partners
m: [REDACTED]
o: [REDACTED]
e: [REDACTED]

Echeverria, Daniel

From: Maureen Makes <[REDACTED]>
Sent: Wednesday, January 5, 2022 5:25 PM
To: Echeverria, Daniel; Wharton, Chris
Cc: [REDACTED]
Subject: (EXTERNAL) Support for the Capitol Park Cottages Rezone

Dear Mr. Echeverria and Mr. Wharton,

I am writing in support of the proposed Ivory Homes rezone in the Avenues (petitions PLNPCM2020-00334/00335, PLNPCM2021-00656, PLNSUB2021-01175).

I am a resident and homeowner in the Avenues and was distressed to read in my Avenues Community Council newsletter that the POAZC felt this development was "overly dense for this suburban foothills location". Any argument that one of the original neighborhoods of Salt Lake, less than a mile from the Capitol, is suburban is completely baseless. I live in the Avenues because I want to be part of Salt Lake City, not the suburbs. We are an urban community by any definition of the word I could find.

This Ivory Homes project will help allow more people to be part of this amazing neighborhood and hopefully encourage more affordable rental opportunities while maintaining the residential feel of the neighborhood. We, as a community, have to plan for the growth our city is experiencing with more than just new high rise apartment buildings or sprawling suburban communities at the point of the mountain. This project provides an opportunity for us to be part of the solution to our housing accessibility challenges without losing the charm of the neighborhood.

I understand you have gotten a lot of dissent for this project, and I appreciate all of your thoughtful work to balance all of the competing needs.

Sincerely,
Maureen Botoman
467 C St, Salt Lake City, 84103

Echeverria, Daniel

From: Garrett44 <[REDACTED]>
Sent: Wednesday, January 5, 2022 1:09 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory ReZone Capitol Park Cottages Yes

To Whom It may Concern,

I believe rezoning the Capitol Park Cottages will be beneficial to my neighborhood. I have lived in the Avenues for 6 years now and have found it a friendly and beautiful neighborhood. I think it would be a gift for others to live here. By rezoning more would be welcomed and enjoy the diversity and community of the Avenues.

Accessory Dwelling Units have been a part of the Avenues for a long time, if not forever. They allow for families to live together; such as multi-generational families - of which I am one of. Living with my son, his wife, and their children has helped us all; especially during these past couple of years of the pandemic. We help each other and are able to because we live close.

ADU also would allow for people to live close to work if they work downtown. By living closer to work traffic and air quality improves; people can walk to work or commute with their neighbor.

I believe rezoning the Capitol Park Cottages will be a good idea. I like that there is a small community park planned and additional parking spaces for guests.

I believe the rezoning will bring to our Avenues more diversity, cultures, and new friends. This is what the Avenues is about!

Sincerely,

Ellen Garrett

BCC: [REDACTED] [REDACTED]

Echeverria, Daniel

From: Margo Becker <[REDACTED]>
Sent: Wednesday, January 5, 2022 1:06 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) No Ivory Homes Rezone

Hi Daniel,

I would like to make clear my **opposition** to the revised Ivory Homes rezone proposition! I wrote before the holiday but never heard back from you so thought I would send it again. The Avenues neighbors do not want this high density, low quality development. It should be clear to the City by now but it seems Ivory will do everything it can to get its way. They have already asked for too many concessions. They should be given none. There are rules for a reason. Please listen to the people who live here.

We do not want Ivory Homes in our neighborhood!!

Thank you and happy New Year!

Margo Becker

--

Margo B. Becker
[REDACTED]

Echeverria, Daniel

From: Haynes Goodsell <[REDACTED]>
Sent: Wednesday, January 5, 2022 11:55 AM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) Opposition to the Re-Zone for Ivory Homes 675 North F Street

I am very opposed to the rezoning of any avenues areas. Its real draw is exactly what is being undermined by the attempt to overdeveloped the parcel on F Street. I live here because of the small and neighborly feel that the avenues is, and has been up until now. People come for the historic character of the area and these modifications- even small - have a negative impact.

Thanks for your consideration, Haynes Goodsell

--

Haynes Goodsell
MFA
haynesgoodsell.com

Echeverria, Daniel

From: Anne Anders <[REDACTED]>
Sent: Wednesday, January 5, 2022 11:16 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) No Ivory Homes Re-Zone

Planning Committee

I am writing to oppose the Ivory Homes Rezone. Our residential neighborhood can not handle rezoning and the building of high density housing. The quality of our life will be altered forever. We have a high level of traffic on 11th avenue already and on E streets on down. We want to preserve our residential area from increased traffic and rentals.

The problem with all the plans submitted is they are all high density and a gross overdevelopment of this land which will result in an additional 40- 80 cars on our already high traffic avenues.

Please do not approve this and ruin this beloved neighborhood as well as set a future precedent for continued high density housing here.

Thank you for representing the residents.

Anne Anders
354 E 11th Avenue
[REDACTED]

Sent from my iPhone

Echeverria, Daniel

From: Cristina Raspollini <[REDACTED]>
Sent: Wednesday, January 5, 2022 11:11 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED] Lore HanShan
Subject: (EXTERNAL) Opposition to latest Ivory Homes Planned Development for 675 N F Street

Dear Mr. Echeverria,

My name is Cristina Raspollini, my husband Lorenzo Botto and I live on 729 E 18th Avenue.

We both totally oppose Ivory Homes latest planned development on 675 North F Street and all associated rezone requests. This proposed development is definitively overly dense for this suburban, foothills location with many disadvantages to Avenue residents.

Ivory Homes is requesting a rezone, from FR-3 to SR-1, to build 19 lots and at least 14 ADUs to these newly created lots, for a total of 33 dwellings – a 300% increase in household density. In addition, Ivory Homes is requesting approval for a Planned Development that allows relaxation of the zoning requirements of the SR-1 they are applying for. Lot size, setbacks, lot building coverage, etc. are all seriously non-conforming.

Please, do not allow this Ivory Homes plan to go forward.

Thank you for your consideration,

Cristina Raspollini and Lorenzo Botto

CAROLYN B McHUGH
322 East Penny Parade Drive
Salt Lake City, Utah 84103

January 4, 2022

Mr. Daniel Echeverria
Senior Planner
Salt Lake City Planning Division
By Email: Daniel.echeverria@slcgov.com

Re: Ivory Homes' Request for a Zoning Map Amendment, a Master Plan Amendment, and for approval of a Planned Development (the "Rezoning Request") for the 3.2 acre lot located at 675 North F Street (the "F" Street Property).

Dear Mr. Echeverria:

I am a resident of Capitol Park, where I own a home that is the single biggest financial investment I have ever made. My decision to buy my home was made in reliance on the character and ambiance of the neighborhood, which I understood was protected by the zoning designation and the Avenues Master Plan. It should be no surprise then, that I am vehemently opposed to Ivory Homes' Rezoning Request.

Before I set forth my specific objections to the Ivory Rezoning Request, I pause to put the proposal in context.

The F Street Property, Capitol Park, and the condominium projects known as the Meridien and the Annex, were all once owned by Primary Children's Medical Center. Primary's decision to sell that property raised serious concerns by Salt Lake City that "the scale, design and density of any new development will be low-density residential in nature." The City concluded:

From the planning standpoint, land use at [the Primary Children's property] 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. . . . **The primary concern at this location is that the scale, design, and density of any new development will be low density residential in nature.**"

That concern is what drove the City to impose the existing restrictive covenants on the property that would become Capitol Park, the Meridien, the Annex, and the F Street Property.

Two of the original Primary Children's buildings were deemed of historical significance and therefore preserved by converting them to condominium projects, now known as the Meridien and the Annex. Although the City approved the repurposing of these buildings for condominium use, it required that they be developed with ample green space and in a design consistent with the adjacent Capitol Park neighborhood. To prevent excessive density, the City restricted the Meridien to a maximum of 29 units, only 26 of which were built, and it restricted the Annex to a maximum of 7 units. These restrictions resulted in 7.56 units per acre at the Meridien and 3.85 units per acre at the Annex.

The developers constructed the homes in Capitol Park and the condominium projects at the Meridien and the Annex in compliance with the City's restrictions. Individuals then relied on those zoning restrictions and covenants when purchasing homes in this low-density, residential neighborhood.

The character of the former Primary Children's property remains low-density, residential and the roads leading to it continue to be narrow and steep. Indeed, the City rejected Capitol Park's attempt to make Capitol Park Avenue, and the other streets in the development, city streets because they were deemed too narrow and steep.

Ivory bought the F Street property with full knowledge of the building restrictions. If no changes are made, Ivory may construct 11 homes plus 11 ADU's for a total of 22 units on the F Street Property. I have no objection to Ivory developing the F Street Property as permitted by the existing restrictions.

Ivory, however, now wants to avoid the rules that all other developers of the Primary Children property have been required to follow. Ivory's Rezoning Request should be denied because it is antithetical to the City's concern that development of the property be restricted to low-density, residential. Further, it serves no purpose consistent with planned developments.

Ivory's Rezoning Request seeks permission to build 38 units, rather than the 22 currently allowed. This would result in a 173% increase in the number of units and increase the units per acre to 11.88. This is an unacceptable increase in density that will negatively impact the character and ambience of this community.

In harsh contrast to the exiting developments, including the Meridien and the Annex, Ivory's proposal is devoid of reasonably sized yards and contains only one privately-owned green space. The proposal seeks to reduce the current lot-size requirement of 12,000 square feet to less than 5,000 square feet, and to include a series of retaining walls running both north/south and east/west that will further chop up and congest the development. All of this is designed to cram the maximum number of dwelling units onto a modestly sized parcel in an existing low-density neighborhood.

As the City correctly determined when these restrictions were imposed, such high-density construction is not compatible with this neighborhood. The Rezoning Request would add as many as 70 vehicles, thereby increasing traffic on the narrow, steep avenues roads by over 100,000 trips per year. Ingress and egress to this area during winter storms is already perilous. The addition of 70 extra vehicles will unacceptably exacerbate that danger. Not surprisingly, recent surveys have shown that Avenues residents are overwhelmingly opposed to Ivory's Rezoning Request (1,244 votes against and 25 for approval).

Finally, any claim that Ivory's purpose is to provide affordable housing can be easily dismissed. Ivory anticipates that the homes constructed on the F Street Property will sell for between \$1 and 2 Million, and it estimates the ADU's will rent for as much as \$2,000 per month. Where the median annual household income of a City resident is \$45,883, there is little question that these homes are not affordable to most of the City's population. Thus, Ivory's stated motive of providing affordable housing is simply not plausible. While profit seems more likely the driving force behind Ivory's quest for density, the incapability of this Rezoning Request with the surrounding neighborhood is reason enough to reject it, whatever the motivation.

In closing, I bought my home with the understanding that the City had committed to retain the low-density, residential character of my neighborhood. Ivory Homes bought the F Street property with full knowledge of the restrictions designed by the City to fulfill that commitment. I respectfully request that the City reject outright this latest attempt, and all further attempts, by Ivory to evade the City's reasonable restrictions on the development of this property.

Respectfully,



Carolyn B. McHugh
Capitol Park Homeowner

Echeverria, Daniel

From: [REDACTED]
Sent: Tuesday, January 4, 2022 5:44 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Sidewalks? Ivory homes & Infrastructure

Mr. Echeverria:

I've been walking around the streets surrounding the proposed Ivory development. Do you realize there are no contiguous sidewalks to 11th Avenue or public transportation. Most of the streets east of the development contain no sidewalk at all. Elderly people and kids walk mostly in the street in this area both for exercise and to get places. Has the City considered the safety concerns of the additional traffic that will be sharing the streets with pedestrians?

Eskerrik asko,
Danny

Daniel H. Payne
Managing Director - Investments
The Payne Group of Wells Fargo Advisors

Wells Fargo Advisors | 201 South Main Street, Suite 160 | Salt Lake City, UT 84111
MAC H3857-010
Tel [REDACTED] | Cell [REDACTED] | Fax [REDACTED]

[REDACTED] | <http://www.thepaynegroup.wfadv.com>

From: Payne, Daniel
Sent: Tuesday, December 21, 2021 4:18 PM
To: [REDACTED] <[REDACTED]>
Subject: Ivory homes & Infrastructure

Daniel:

I have lived in Capitol for the last 19 years and grew up across the canyon in the Ensign Peak area.

I built my house up there on 0.67 acres to enjoy space with my family, a big yard with trees and distance from my neighbors.

My concern with the Ivory Homes development is that the current infrastructure cannot support the additional cars and people.

The streets in CPHOA remain private because they are not wide enough for the city to take them or a fire truck to turn around.

We are also responsible for our own snow removal and sometimes it just doesn't happen.

During this latest snow storm, a truck that was going to work on the Wright Annex Building got stuck on the steep part of Capitol Park in front of my house all day. This is a common occurrence every winter.

My wife and kids couldn't get out and missed school. I can only imagine the additional traffic problems and liabilities that will be created by all the Ivory homes cars cutting through our narrow HOA streets.

Also the lack of sidewalks, additional road use and burden on the utilities underground concerns me. Thanks for taking a look at these issues before we get too far.

Thanks,
Danny Payne

Daniel H. Payne
Managing Director - Investments
The Payne Group of Wells Fargo Advisors

Wells Fargo Advisors | 201 South Main Street, Suite 160 | Salt Lake City, UT 84111
MAC H3857-010

Tel [REDACTED] | Cell [REDACTED] | Fax [REDACTED]

[REDACTED] | <http://www.thepaynegroup.wfadv.com>

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Echeverria, Daniel

From: David Murrell <[REDACTED]>
Sent: Tuesday, January 4, 2022 5:34 PM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Cc: David Murrell, IV
Subject: (EXTERNAL) Against Ivory Homes Rezone

Dear Mr. Echeverria,

Thanks in advance for reading this. I'll keep it short.

My wife and I, Mary Beckerle, live on 11th Avenue and "D" street and we are strongly opposed to the Ivory Homes rezone for a multitude of reasons.

1. Density of homes is too great. (33 dwellings is a 300% increase from current zoning)
2. Homes will NOT be affordable to most people, thereby negating SLC's push for affordable housing.
3. No viable public transport. Not walkable to city center.
4. Too much traffic on our public AND private roads. Capital Park Ave is a private road.
5. The development just doesn't fit in with the Avenues.

Why doesn't Ivory just abide by the current zoning and build houses that fit in with the neighborhood? Please consider what the VAST majority of Avenues residents want and deny their application for a rezone.

Thanks again for your valuable time and for all you do.

Best Regards,

David MURRELL

Echeverria, Daniel

From: brian moench <[REDACTED]>
Sent: Tuesday, January 4, 2022 4:56 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) 675 N F St. Capitol Park Cottages proposal

Dear Mr. Echeverria:

Residents of the high avenues asked Utah Physicians for a Healthy Environment (UPHE) to explain to the SLC Planning Staff the reasons why they are concerned about the environmental consequences of the Ivory Homes proposal for a 19 lot, single family home development, Capitol Park Cottages, in their area.

The residents' concerns about increased pollution are legitimate. Many of the residents of the Meridien are retired, and because of their age and the common morbidities associated with age, are more vulnerable to the multiple health consequences of air pollution. Those consequences include heart and lung disease, increased risk for cancer, diabetes, neurodegenerative diseases like Alzheimer's, and shortened life expectancy.

Their concerns about being exposed to increased air pollution because of the proposed development are valid in that the homes in the planned development, and the increased traffic, will add new sources of pollution to the immediate area, and air pollution routinely concentrates near its sources.

If those homes use natural gas for water heaters, cooking stoves, and indoor heating, that will cause a significant rise in local nitrogen oxide (NOx) emissions. NOx is a "double whammy" pollutant in that it is a precursor of both of the high volume, primary pollutants tracked by the EPA, PM2.5 and ozone, as well as causing its own toxicity. Pollution concerns would be magnified further because of the increase in local traffic that would be generated, and if any of those new homes use any wood burning devices, i.e. fireplaces, wood stoves, or outdoor fire pits, then the pollution concerns would be greatly magnified because wood smoke is the more toxic type of pollution the average person is ever exposed to. All these concerns are enhanced further if these homes are allowed to have "accessory dwelling units."

The residents have concerns about the loss of 100 year old trees. Those concerns are also legitimate for multiple environmental reasons, including the fact that trees have been shown to help reduce local pollution levels by filtering PM2.5.

In short, if I lived in the area, I would be doing everything I could to protect the livability of my immediate environment from being degraded by the air pollution associated with this development. I encourage you to consider this and reject Ivory's proposal.

Sincerely,

Dr. Brian Moench
President, Utah Physicians for a Healthy Environment

January 3, 2022

Mr. Daniel Echeverria
Senior Planner, Salt Lake Planning Division
Salt Lake City, UT 84114

Dear Mr. Echeverria:

I am writing to comment on the request by Ivory Development to change the zoning on 675 N F Street from FR-3 to SR-1.

I am one of over 100 residents of Northpoint, a community in a Wildland Urban Interface, an area of Salt Lake City classified by the Salt Lake Fire Department as most at risk from wildfires. This is not a theoretical risk. In 2015, Northpoint residents had to keep a wildfire in City Creek Canyon from their homes with garden hoses until the Fire Department reached Northpoint.

The construction in 2020 of a new trail in City Creek Canyon, within fifty feet or less of the Northpoint boundary, has increased the risk of a Canyon fire started from activities on that trail (such as the fireworks that recently caused a fire on the Ensign Peak Trail) spreading even more quickly to Northpoint.

The Salt Lake Fire Department has given the Salt Lake Planning Commission a very clear written directive for making zoning decisions with respect to land within a Wildland Urban Interface. In its "Guide to Fire Adapted Communities," posted on the Salt Lake Fire Department's website, the Salt Lake Fire Department explicitly tells the Planning Commission that:

"Proactive land use planning is one of the best ways to address wildland fire concerns and to decrease the number of residents at risk of damage from future wildfires."

Based on the Fire Department's directive, the Planning Commission should only make zoning changes that decrease the risk of damage to Northpoint residents from future wild fires. But the proposed zoning change, by delaying the time it would take Fire Department vehicles to reach Northpoint to fight future wildfires, would instead increase such risk.

Northpoint's F Street entrance is the only way into and out of Northpoint. The section of F Street from Northpoint's entrance to F Street's first intersection with another street, Capital Park Avenue, constitutes a "chokepoint" for Fire Department vehicles trying to access Northpoint in the event of a wildfire.

If the proposed zoning change is approved, Ivory suggests it would build 5 two-household "cottage homes" on the west side of Northpoint's F Street chokepoint. At least 20 vehicles would then be entering and exiting directly onto Northpoint's F Street chokepoint from these 5 homes. But the zoning change would also allow as many as 7 such homes, with 28 vehicles entering and exiting from them, to be put on Northpoint's F Street chokepoint.

On the other hand, it is likely that only 3 or 4 of the 11 homes allowed under existing zoning, with only 6-8 vehicles, would open directly onto Northpoint's F Street chokepoint. The zoning

change would therefore likely result in households with 12-22 more vehicles being placed on Northpoint's F Street chokepoint than would occur under existing zoning.

At least some of these additional vehicles will almost always be parked on F Street. On-street parking from the four existing houses on the eastern side of F street, directly across from Ivory's property, already frequently keeps through traffic from using the eastern lane of Northpoint's F Street chokepoint, reducing it to three lanes.

On-street parking by at least some of the additional 12-22 vehicles placed on Northpoint's F Street chokepoint by the zoning change would create a greater probability that, at any given time, both the eastern and western lanes of Northpoint's F Street chokepoint would be blocked to through traffic, narrowing that chokepoint to only two lanes, compared to the on-street parking from development allowed under existing zoning.

This more constricted Northpoint F Street chokepoint would also have more vehicles entering and exiting directly onto it at any given time than would occur under the development allowed under existing zoning. Added to this additional congestion would be congestion from the other vehicles from Ivory's proposed development, most of which would likely enter and exit Capital Park Avenue from the end of Northpoint's F Street chokepoint.

If the proposed zoning change is approved, the increased probability of a more constricted Northpoint chokepoint, combined with greater congestion on that more constricted chokepoint, would, in the event of a wildfire, result in an increased probability of incremental delay in the time it takes fire and emergency vehicles to reach Northpoint, compared to the delay that would be caused by development allowed under existing zoning. Such incremental delay would increase the risk of future wildfire damage to Northpoint homes, and also increase the risk of injury or even death to Northpoint residents from future wildfires.

Since the development that would be permitted by the proposed zoning change would clearly increase the risk of wildfire damage to Northpoint residents over that from the development permitted by existing zoning, the proposed zoning change would also be clearly contrary to the explicit directive of the Salt Lake Fire Department to the Salt Lake Planning Commission that the Planning Commission instead exercise "proactive land use planning" to decrease such wildfire damage risk.

For Salt Lake City to so blatantly disregard the explicit directive of its own Fire Department would constitute gross negligence by the City so egregious as to make Salt Lake City legally liable for any resulting wildfire damage.

Very truly yours

Donald Warmbier
827 N Grandridge Dr.
Salt Lake City, UT 84103

[REDACTED]

Echeverria, Daniel

From: Carol Moss <[REDACTED]>
Sent: Tuesday, January 4, 2022 12:19 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Objection to the latest Ivory proposal for F Street development

Mr. Echeverria:

My husband and I want to express to you our opposition to the proposed changes by Ivory Homes in the zoning on F Street at the corner of Capital Park Avenue. After reviewing the latest proposal from Ivory Homes for this piece of property, we feel more strongly committed to opposing the proposed changes in zoning for the area.

Ivory Homes, no doubt, has some good concepts to address housing needs but upon review, the proposal of "affordable housing" in this specific area is not realistic. The proposal remains more like pricey, congested and dense living space. They speak well in favor of providing housing but their plan belies the plan with actual numbers that will cause a huge and unforgiving impact on the present day neighborhood.

We have several concerns. One is the obvious conflict of so many cars being housed in the proposed development. At last count it could be as high as 66 cars. How do they enter and exit the property without creating traffic congestion at certain times of the day? Street parking is extremely limited in this location and it is even more constrained in the winter. And how do we at Northpoint exit at times of an emergency when competing with a possible extra 66 cars exiting at the same time? How do fire trucks enter the Northpoint development during such an emergency when needed? This one issue alone should concern your deciding body enough to turn down the proposed change.

There is another concern for the proposed ADU's and their occupancy. Will they be filled with permanent occupants? Will they be over nighters? Will they be part of a commercial endeavor by the owners, such as Air B&Bs? This could bring new concerns for both Ivory residents and Northpoint Estate residents.

Finally, but certainly not the least concern, is the impact on the character of the Greater Avenues on the whole. This portion of the Avenues has been well planned out over the years. I might add, this end of the Avenues has had very careful planning since the days of the demise of the hospitals that occupied this area. Great lengths were pursued in order to develop this portion of the Avenues with an excellent outcome. Beauty and style were planned and constructed to make it a lovely, well thought out piece, with nature habitats left in place to blend human occupancy and natural species in cohabitation. If you are not familiar with this history of our neighborhood, we urge you to review it before you make any decisions for a change in zoning laws. We believe this new development will destroy the natural peace and habitation for both neighbors and the animals of the area.

We ask you to please not let this last corner of the Avenues neighborhood be turned into what will be a difficult property to live with and will be disruptive to what has been carefully and tastefully developed over time. We hope you will not approve this request for a change in zoning.

Sincerely,

Brian Hart Moss and Carol Brennan Moss, Northpoint residents

Echeverria, Daniel

From: Mitchell Peterson <[REDACTED]>
Sent: Tuesday, January 4, 2022 11:21 AM
To: Echeverria, Daniel; Wharton, Chris
Cc: [REDACTED]
Subject: (EXTERNAL) No Ivory Homes Re-Zone

To all concerned,

I would like to voice my opposition to the Ivory Homes proposed rezone as well as their project in general. I have a lot to say here, but I will try to keep it brief.

Under the FR-3 zone, they are currently allowed to build 11 homes. This is more than enough homes to have on that parcel. Traffic is already a concern, especially on I street, which would be the main feeder for these homes. The neighboring homes to the West are much more spacious than the required 12,000 ft, so even building on 12,000 sq ft lots is not keeping with the character of the neighborhood.

The SR-1 zone is for historic homes and a historic neighborhood. A brand new high density housing bubble inside of the FR-3 zone would not be part of the historic neighborhood, so it should not be allowed to be zoned as such.

This would set a very bad precedent. There is still quite a bit of land that can be developed in the FR-3 zone. It would be tragic for The Avenues as well as SLC in general if these areas of land are all allowed to be turned into high density housing. I say this because if you allow the zone change and proposed development for Ivory Homes when they face no hardships and there is no reason at all for this change except for an increased profit for Ivory Homes, then you will have nothing to stand on when the next developer requests the same. This would fly in the face of the Purpose Statement for the FR-3 zone and the reasons that the restrictions have been put in place. I have been to Ivory's "The Pines". It is very much a high density apartment home style development. All the homes look the same, they are all jammed together so close that there is no room to breathe, let alone have children play. This is specifically the style of development that the FR-3 zone was put in place to avoid. This would not be keeping with the character of the neighborhood, and would detract from the eclectic charm of The Avenues.

Thank you for your time,

Mitchell Peterson

Echeverria, Daniel

From: Robert Felton <[REDACTED]>
Sent: Tuesday, January 4, 2022 11:16 AM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) 675 F st.

Sir, please note my opposition to the application of Ivory homes for any change in zoning to the property they acquired and the zoning accompanying it. I am a 50 year resident of the avenues and am distressed at the profit over lifestyle attitude of this company Truly Yours Rabbit Felton, 1373 3rd ave.

Sent from my iPad

Echeverria, Daniel

From: Ingrid Hartman <[REDACTED]>
Sent: Tuesday, January 4, 2022 11:06 AM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Please reject Ivory Homes Re-zone

Dear SLC City Planning Division,

I just purchased a house at 417 E. 10th Ave. As a new home owner in the Avenues, I am writing to voice my opposition to the Ivory Homes rezone on F Street.

I'm all for more housing and more diversity of housing, but this project does NOT respect the zoning of the Avenues, the Avenues future development plan, and the current character of the neighborhood.

Please listen to the people who will be directly negatively impacted by the project (my new house is just down the street from it). I would strongly recommend approving the project as it was originally conceived with proper density and setbacks approved by the neighborhood, and say NO to the new rezone.

If you have questions, I can be reached at [REDACTED]

Thanks,
Ingrid Hartman

417 E. 10th Ave
Salt Lake City, UT 84103

Echeverria, Daniel

From: Pamela King <[REDACTED]>
Sent: Tuesday, January 4, 2022 10:40 AM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Oppose Ivory Homes Re-zone

SLC City Planning Division,

I live at 569 N H Street in the Avenues. I am writing to voice my opposition to the Ivory Homes project on F Street. Please do not allow this construction project. Our neighborhood is not set up for a project of this scale. The project does not respect zoning. If you have questions, I can be reached at [REDACTED] My email address is [REDACTED]

Thank you,

Pamela Joy King
569 H St
Salt Lake City, UT 84103-3220

Echeverria, Daniel

From: Jason Bresley <[REDACTED]>
Sent: Tuesday, January 4, 2022 9:46 AM
To: Wharton, Chris; [REDACTED]
Cc: Echeverria, Daniel
Subject: (EXTERNAL) Re: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

Want to make sure my voice is heard. Please reference below. Vote No!

On Dec 3, 2021, at 04:24, Jason Bresley <[REDACTED]> wrote:

My comments regarding Ivory Homes' (third attempt) to over-develop the small space on F street:

I truly hope the council votes NO to this "[over]development plan" as it will ruin the integrity of the neighborhood in so many ways. First, it's already an established neighborhood with TOO MUCH TRAFFIC as it is!! Adding 19 more units and 14 ADUs will only increase the amount of cars and trucks parked on the side of the roads. If each single family residence averaged 2 cars, and 1 for each ADU, then you should expect at least 52 cars to be added to that 3 acre area. That's not counting visitor's cars. More vehicles and traffic will also bring more crime to the entire Avenues area. If the intent is to provide more "affordable housing" to the community (as was their pitch last time), then this is NOT the place to OVER-develop. There are PLENTY other places to develop that would be better suited to meet the needs of people needing affordable housing, that are better situated than in the Avenues. There are no businesses in the area to accommodate the needs of such. The current infrastructure with the increased traffic only poses a safety risk for our children who don't have enough sidewalks to walk on. This proposal is the work of a greedy man who has no regard for the wants and desires of the community he claims to care about (hence why he continues to ignore the voices of the community who are avidly opposed to his proposal) and is continuing his development plan in order to line his pockets with more money. VOTE AGAINST THIS PLEASE!!

Jason Bresley

635 E 12th Ave

[REDACTED]

On Nov 30, 2021, at 01:47, Echeverria, Daniel <[REDACTED]> wrote:

Echeverria, Daniel

From: Natalie Shutt-Banks <[REDACTED]>
Sent: Tuesday, January 4, 2022 9:14 AM
To: Echeverria, Daniel; [REDACTED]
Subject: (EXTERNAL) No Ivory Homes Re-Zone

Dear Mr. Echeverria,

I am writing to oppose the proposed Re-Zone at 675 North F Street. I have several reasons for my opposition:

1. Existing home property values will decrease due to the increased traffic load. This is a very established neighborhood and I do not believe that existing homeowners should see a decrease in their property values so that the Ivory's can make an extra buck.
2. This does not provide the much needed affordable housing to the city that would warrant a variance in zoning.
3. The location of the proposed high density development is not in compliance with the city's 5 year housing plan that clearly states that high density developments need to be in walkable areas. The plan was an attempt to use best practices for sustainable urban development.
4. The site is eventually going to be utilized but a less dense development will be better for the existing wildlife and the current greenspace aesthetic in the area.

Feel free to contact me with any questions.

Sincerely,

Natalie Shutt-Banks
861 E. 1st Ave
SLC, Ut 84103
[REDACTED]

Echeverria, Daniel

From: Rachel Bebbington <[REDACTED]>
Sent: Monday, January 3, 2022 12:54 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Fwd: Ivory Rezoning

Apologies prior email sent without Subject

Sent from my iPad

Begin forwarded message:

From: Rachel Bebbington <[REDACTED]>
Date: January 3, 2022 at 12:52:24 PM MST
To: [REDACTED]

Dear Daniel,

My name is Rachel Bebbington and I am a resident of the Avenues on Penny Parade Drive.

I know you have received overwhelming opposition to each rezoning application by Ivory so I will keep my email to you short.

The avenues masterplan clearly articulates that "Special emphasis should be placed on regulating foothill development..." And "devise a growth management program that includes strategies to help protect the foothills from continued urban encroachment." The masterplan also states "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 dwellings..." In terms of lot size, the master plan states "the community planning process strongly support[s] increasing lot area requirements for future subdivisions." Finally, the masterplan clearly identifies the area above 12th ave and west of F street as "very low density housing." The proposal does not meet any of these requirements unless the masterplan is modified.

My understanding is that the current zoning would allow Ivory to add an ADU to each home they build. The current zoning allows for 11 homes and with an ADU would allow for 22 units. That seems more than adequate to meet their needs, would remain consistent to the master plan that we as homebuyers relied on and provide some relief to traffic control and congestion in the neighborhood.

Please log my opposition to the most recent proposal from Ivory.

Many thanks

Rachel Bebbington

www.sentry.financial

[linkedin.com/in/andrew-bebbington/](https://www.linkedin.com/in/andrew-bebbington/) Sent from my iPad

Echeverria, Daniel

From: Ceri Jones <[REDACTED]>
Sent: Monday, January 3, 2022 12:09 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Opposition to Ivory Homes requested rezone of 675 N F Street

Dear Mr. Echeverria,

I am writing to share my opposition to Ivory Homes' proposed rezone of the 675 N F Street property from FR-3 zoning to SR-1. As a resident of 10th Avenue between B and C streets, I am concerned about the impact of the increased traffic on the neighborhood below the proposed rezoning.

With the reduced lot size that the SR-1 zoning would allow and no direct access to public transportation, I am concerned that each house in the proposed development will add at least two cars to already busy traffic patterns. With the 33 dwellings that Ivory's requested rezone would include, with at least two cars per household, traffic would increase significantly and affect neighborhoods surrounding the F street property. In households that include multiple family members and the accessory dwelling units, the number of additional cars on the streets will likely increase to more than 70 and possibly even closer to 100 more cars in the neighborhood every day. This increase in traffic also directly conflicts with the city's Five Year Plan, which supports the growth of high-density housing in neighborhoods that provide walkability to shopping, jobs, and civic and recreational activities.

Thank you for considering my thoughts in this matter.

Best regards,

Ceri Jones

Echeverria, Daniel

From: Betty Anderson <[REDACTED]>
Sent: Monday, January 3, 2022 10:19 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; Alan Hayes
Subject: (EXTERNAL) Ivory Homes Recent Request for Zoning Change on 675 'F' Street

January 1, 2022

Daniel Echeverria
Senior Planner
SLC Planning Division
[REDACTED]

Dear Mr. Echeverria,

I have written to you several times in the past concerning my opposition to Ivory Homes request for a zoning change on the property at 675 'F' Street. Their most recent submission to the Planning Division does not satisfy any of my objections to their former submissions/requests for zoning changes. They are still proposing a housing development with a much greater density than is consistent with existing Avenues zoning and the additional cars, traffic and access road problems along with the objections I have previously mentioned, make their current proposal as objectionable as their other proposals.

I have lived in the Avenues for over 50 years and I strongly feel that these continuing proposals from Ivory Homes, do not show any concern for the quality of life that currently exists in this area of the Avenues and also strongly suggests Ivory Homes is looking to increase their profits on this parcel at the expense of current Avenues residents. It would seem they plan to build as many units as possible with little or no regard for future problems with residents cars, increased street congestion and access road problems. These kind of problems will result in an increased burden on our police and fire departments. For these reasons and others explained in my previous letters to the planning commission, I am strongly opposed to Ivory Homes' latest request for a rezone of the property known as 675 'F' Street.

Yours truly,
Betty Anderson
612 E. 10th Ave
SLC, UT 84103

cc: [REDACTED]
[REDACTED]

Echeverria, Daniel

From: CHRISTOPHER KAUFFMAN <[REDACTED]>
Sent: Monday, January 3, 2022 9:44 AM
To: Echeverria, Daniel
Cc: Wharton, Chris
Subject: (EXTERNAL) NO on Avenues Ivory Homes Re-Zone

Hello-

I am a 7-year resident of the Avenues and live on 13th Ave just 3 blocks down the street from the proposed Ivory Homes project. I am writing to voice my strong opposition once again to the proposed re-zone by Ivory Homes at 675 North F Street in the Avenues. I STRONGLY OPPOSE this re-zone as it will alter the look and feel of the neighborhood. There will be an additional 70 cars added to this area as well as loss of proper setbacks, green space, and sidewalks. The mature trees will be removed and surely not sufficiently replaced. There is not sufficient infrastructure for the proposed number of dwelling units. The area is zoned for 11 homes not 300+% more. In addition, this will not be an increase of affordable housing as I am sure the starting prices for these dwellings will be at least \$750,000+

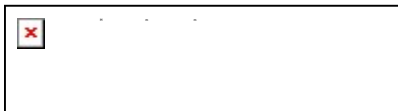
All that is one thing, but I think all that really needs to be said is that is the residents of the Avenues voted 688-4 against this project in August of 2020 and then again 1244-25 in April of 2021. That is the loudest voice in its statement of how the people who live here feel about this. If you go against that kind of opposition then I am at a loss. This whole process will have been a farce.

Christopher Kauffman
580 E 13th Ave
SLC, UT 84103



Christopher A. Kauffman

Nora Eccles Harrison Cardiovascular Research and Training Institute



January 3, 2022

Mr. Daniel Echeverria
Salt Lake City Division of Planning

Dear Mr. Echeverria:

I am writing to oppose the newest development plan on "F" Street by Ivory Homes.

The Avenues has in-place zoning laws as well as a master plan. I don't understand why this outrageous attempt to subvert both is even being considered.

As you know, any resident of the City must abide by our zoning laws. If they wish to violate these laws in any way....add on to an existing home, build a new and bigger garage or build a tiny home in the backyard, the City and their neighbors have the ability to stop their illegal plans and require them to amend their dreams.

The residents of the Avenues have spoken repeatedly and in great numbers against Ivory Homes and their blatant disregard for both our zoning and our master plan...why is this even being discussed? Let them build the 11 homes which are approved by the current zoning. If they are not happy building 11 homes, they can sell the property and build elsewhere....that is the solution that would be available to you or me....why not Ivory Homes?

Everyone knows what this is about...two things. First...Ivory Homes wants to tear a hole in our zoning. The first time is hardest, but subsequent requests should be easier due to the first time precedent. Second...this is all about money. Ivory Homes money...they want to make more money and can do that by building more units.

Why is the Division of Planning so fixated on Ivory Homes making more money? What is in this Ivory Homes proposal that is so appealing to anyone but them? Who does it benefit? Certainly not the people desperately looking for homes...these "units" are very costly...certainly out of the price range of 99% of potential buyers...The Ivory Homes

potential buyers can live anywhere. We do not need to accomodate Ivory Homes to find housing for people who can afford to live anywhere...I repeat...who does this benefit?

This Ivory Homes proposal does not benefit me, my neighborhood or my desire for responsible development. We need housing, but, not this housing.

Anne Albaugh
453 E 3rd Avenue
Salt Lake City, UT 84103



Echeverria, Daniel

From: [REDACTED]
Sent: Sunday, January 2, 2022 5:02 PM
To: Echeverria, Daniel
Cc: Mayor; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Objection to Ivory Homes Planned Development at 675 North F Street

Daniel,

I live on H Street, two blocks from Ivory's proposed development at 675 North F Street, and have compared their current site plan to typical Avenues' treatment of sloping blocks. While their site plan might work well on a flat site, imposing it on a sloping site creates multiple problems and would produce a dramatically different appearance partly because of design decisions they've made.

One of the plan's problems is Ivory's decision to conjoin driveways between mirrored multi-gen units, which doesn't allow for stepping between adjacent lots typically found in the Avenues, and apparent on the homes across F Street. Usually, a driveway is located at the top of the property, roughly equal elevation with the main floor, and the front yard grade slopes down with the roadway to a low retaining wall at the south property line. Conjoining the driveways midway between two units creates a double-wide flat plane at or near the TOF elevation shown on Ivory's plans. That plane can slope with the roadway grade south of the driveways but not to the north due to drainage requirements, and it cuts into the hillside north of the driveways, requiring excessive retaining on the north boundary of the property.

This problem is exacerbated by insufficient setbacks between buildings, and between roadway and building fronts. On a typical Avenues lot, front and corner side yards include City right-of-way and yard setbacks, providing a greater dimension between curb and dwellings for grade transitions. Absent this right-of-way space and absent sufficient front setbacks, Ivory's plan requires more retaining in front of and between dwellings, and the proposed two-story structures will crowd the roadway, compounding an overly-dense feeling.

Ivory Homes has done little in their multiple applications to meet SR-1 zoning requirements, choosing instead to seek exemptions through Planned Development designation. Their non-conformance with the code's lot size, lot width, building coverage, yard setback dimensions, and their excessive grade changes and retaining wall heights are all evidence of inappropriate design for this site.

Many of these infractions could be ameliorated with two simple changes in Ivory's site design, and the resulting development would fit the Avenues more comfortably and make the resulting new "neighborhood" much more appealing. The first suggested change is to disconnect the driveways of the paired multi-gen units, which would allow each unit to step with the hillside slope and reduce retaining wall heights.

The second suggested change is to reduce density. Front and rear setback dimensions could conform to code if Ivory eliminated 4 of the 14 interior units, most logically 6, 7, 11 and 12, and spread the remaining lots into the space they occupy. With this change, the remaining interior units could be served with a simplified cul-de-sac roadway, lot size and lot width could meet the code minimums, building coverage could be reduced, and all 15 lots could meet SR-1 yard setback requirements.

Code exemptions allowed in a Planned Development are among the objections that Avenues' residents raise against this development. If Ivory's application conformed to SR-1 zoning requirements, the Planned Development would not be needed, and many of these objections would be addressed. If the Planning Department allows Ivory to circumvent zoning requirements by agreeing to the Planned Development request when it is not necessary, it essentially means there is no substance to zoning code regulations.

I hope the Planning Department is looking critically at the Ivory application and will seek to balance the rights and obligations of the developer with the Avenues' concerns about design compatible with the site and with City code.

Respectfully, Jim Bach

A black rectangular redaction box covering the signature of Jim Bach.

Echeverria, Daniel

From: JW [REDACTED] Ballard <[REDACTED]>
Sent: Sunday, January 2, 2022 2:27 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Please Stop Ivory Homes ReZone

Dear Mr. Echeverria:

I strongly oppose the rezoning that Ivory Homes has proposed. Here are a few of the reasons this proposal is a bad idea:

1. Too Dense. Very small lots, minimal set back and minimal greenspace are not in keeping with the aesthetics of the neighborhood
2. SR-1 zoning does not exist in the Avenues. Ivory is requesting SR-1 zoning.
3. Adds to congestion on Avenues streets
4. The corner of F Street is a bus stop for children attending both middle and high schools. Mixing more cars with sleepy kids this steep hill on dark winter mornings is not a great idea.
5. Breaks faith. People who purchased homes adjoining this lot expected that FR-3 zoning would continue to be enforced.
6. New housing units are not affordable.
7. Capitol Park Avenue is a private road.
8. Strong opposition in Avenues.

Please don't allow this rezoning effort to happen.

John Ballard
682 18th Ave
[REDACTED]

Echeverria, Daniel

From: Eugene Mishchenko <[REDACTED]>
Sent: Sunday, January 2, 2022 10:54 AM
To: Echeverria, Daniel; Wharton, Chris
Cc: [REDACTED]
Subject: (EXTERNAL) Opposition of the Ivory Homes Application to Re-zone 675 North F Street

Dear Mr. Echeverria, and Mr. Wharton,

I have reviewed Ivory Homes' revised proposal and remain **strongly opposed** to the rezoning of the Upper Avenues neighborhood, 675 North F Street, **from FR-3 to SR-1**. I respectfully urge you to oppose this proposal as well.

The new high density rezoning plan would negatively affect safety (including fire safety) and traffic conditions of the neighborhood located on a steep hillside, which already presents challenging road conditions in wintertime. In particular, having a large number of housing units cramped into a very small space would result in overflow parking on both sides of F Street, essentially making traffic on sections of F Street one-way. Not only is F Street ill suited for such traffic, F Street is very steep and treacherous during snowfalls and having it packed with parked cars would lead to a large number of accidents.

This rezoning would also change the historical character of our neighborhood. Without exception, all neighbors with whom I had a chance to discuss this profit-driven commercial plan by Ivory Homes are strongly against the proposed rezoning.

Best regards,
Eugene Mishchenko
828 N Juniperpoint Dr, Salt Lake City, UT 84103
[REDACTED]

Echeverria, Daniel

From: Margo Stevens <[REDACTED]>
Sent: Saturday, January 1, 2022 2:57 PM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) Opposition to the Avenues Ivory Homes Rezone

Greetings,

I would like to register my opposition to the new Ivory Homes application to rezone 675 North F St. from FR-3 to SR-1. As I'm sure you are aware Ivory Homes is seeking to build 19 primary residences on property currently zoned for 11 and in addition add an ADU to 14 of these lots. This would be a total of 33 dwellings representing an astonishing 300% increase. The density of Ivory's proposal is far greater than any of the existing developments in the vicinity and raises a multitude of concerns. To name just a few, this plan is not in keeping with the aesthetics of the neighborhood, runoff with this level of density could become a significant issue and the loss of mature trees and wildlife habitat is not a responsible action as we come to terms with the impacts of climate change. This development will likely add approximately 70 cars to a location that is not consistent with the City's 5-Year Housing Plan for higher density developments to be in walkable areas of the city which this area is not. Ivory Homes claim that this high density housing development will help alleviate the city's housing affordability crisis does not align with the reality that these homes will be unaffordable, both to purchase or to rent, by people affected by this crisis. I am a long term resident of the Avenues and I am united with the Upper Avenues community who registered their opposition in the thousands by signing a petition opposing the rezone in July of 2020.

Thank you for your time and attention to this urgent matter,

Margo Stevens
430 G St
SLC, Ut 84103

[REDACTED]

Echeverria, Daniel

From: Smitha Warriar <[REDACTED]>
Sent: Saturday, January 1, 2022 12:13 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) OPPOSED to Ivory Homes Re-Zone

Mr. Echeverria,

Although I strongly believe that we as a city have an affordable housing problem, I am OPPOSED to the proposed rezone that Ivory Homes is requesting for the Avenues neighborhood.

1. This proposal does NOT help with affordable housing when the units estimated selling price from Ivory Homes is close to one million dollars. And to create traffic for roads not meant to handle these numbers, to increase density in the neighborhood that wasn't planned (which affects all nature and resources for the area)...for no justifiable reason...makes no sense. The zoning that exists is for a reason, this proposal does not in any actual way create a benefit to our city or community enough to justify the re-zone...the reasons given by Ivory Homes and benefits proposed are being stated to change the zoning but with no actual accountability or reliability for the proposed goals.

2. This proposal is not in alignment with the City's 5 year Housing plan...this proposed increase in density is not in an urban area and not in proximity to walkable areas (stores, adequate public transportation for the numbers proposed, work places, restaurants, etc).

I could go on, but to remain brief and summarize...my household is OPPOSED to the proposed Ivory Home Re-Zone as it appears to be more in alignment with the benefit created for the developers proposing this change vs the community or citizens of SLC.

Thanks,
Smitha Warriar

Peter Wright
400 E Capitol Park Avenue
Apt. 306
Salt Lake City, UT 84103
December 30, 2021

Mr. Daniel Echeverria
Senior Planner
Salt Lake City Planning Division

RE: Ivory Homes application with respect to 675 North F Street

Dear Mr. Echeverria,

I write to strongly protest Ivory Homes' latest machination in their attempt to over-develop 675 North F Street. In addition to a significant rezone, an amendment to the Avenues Community Master Plan, and a request to approve a plat plan featuring an ADU on almost every lot, Ivory is now asking the city for approval of a planned development. They offer no compelling argument whatsoever as to why a planned development should be granted; in fact, the application for a planned development is nothing more than a "quick fix" to legitimize errors they made in the application process and pack in more lots than would otherwise be achievable under the SR-1 zone.

As you are aware the reason Ivory has now applied for a planned development is rooted in the history of their multiple applications. When Ivory switched their application from FB-UN1 (3000 square foot lots) to SR-1 (5000 square foot lots) they failed to bring their concept plan into compliance with the minimum lot size, lot width, yard setbacks, and other requirements of the new zone. They could and should have at that time modified the concept plan to comply with the SR-1 zone requirements. Instead, they have added a planned development to the already long list of concessions they are seeking from the city.

The planned development Purpose Statement 21A.55.010 allows relaxation of zoning requirements if the development provides "*...a more enhanced product than would be achievable through strict application of land use regulations...*" **Ivory's current plan provides no enhanced product.** Any benefit or enhancement that is gained by adding a handful of additional lots via the planned development is more than negated by the impact these additional lots have in reducing setbacks, lot sizes and increasing lot building coverage and lot hard surface coverage, substantially adding to the high bulk, high mass and high intensity of the development. It should also be noted that Ivory's project does nothing to help with the shortage of affordable housing. They have told us that the units with ADUs will sell for excess of \$1 million and the ADU rentals will be at market rate.

In Ivory's planned development narrative contained in the November 2021 submittal, they claim as justification for a planned development under section 21A.55.010.C2 that *"The Capitol Park Cottages Site Plan was designed to facilitate ADUs in new home construction as a distinctive feature."* This justification is invalid. Since the ADU ordinance allows ADUs to be constructed as original build; there is no need whatsoever for a planned development to build ADUs as original construction.

Ivory claims justification for a planned development under Section 21A.55.010.C2 which requires *"The proposal includes housing types that are not commonly found in the existing neighborhood but are of a scale that is typical to the neighborhood."* Whereas Ivory clearly meets the first criterion in that housing developments with a large number of ADUs do not exist in the Avenues or indeed anywhere in the city, they clearly fail on the second criterion that the development is of a scale typical to the neighborhood. Even a casual glance at a topographical map shows Ivory's proposed development is of far greater density than any of the surrounding properties. Density, lot sizes, yard setbacks, and building coverage are all very different from existing developments in the Upper Avenues, including those in the SR-1A zone.

For the first time in their multiple applications, Ivory has now submitted some detailed plans including a partial grading plan, which shows their intent to terrace the hillside into several large building platforms, with a proliferation of large and unsightly retaining walls running both north/south and east/west. Elevations between adjacent building pads differ by as much as 16 feet and, because dwellings are so close, retaining walls will consume side yard areas. This approach is not at all compatible with development in the Avenues where individual lots generally have no retaining walls, or small retaining walls, with housing and yards progressively following the contour of the hillside. **Ivory's approach scars the hillside with this proliferation of large unsightly retaining walls.** Combined with large, closely packed structures these retaining walls will create a high bulk, grotesque appearance totally alien to the Avenues.

A detailed evaluation of the criteria listed in Section 21A.55.050 Standards for Planned Developments is contained in Appendix 1. Ivory fails to meet many of these criteria.

When Ivory bought the property, they knew full well how it was zoned and were also well aware of the resounding objections of the Avenues community. If Ivory wishes to build ADUs as original construction, they can do so under the FR-3 zone without resorting to a rezone or a planned development. This would facilitate a development with up to eleven primary dwellings and eleven ADUs and would achieve their proclaimed objective of a development featuring ADUs as original construction. We urge the Planning Division to show its good judgment by not supporting Ivory's sham request for a planned development. Avenues residents are well aware of the housing shortage facing the city; however, all of the concessions Ivory is requesting combine to give a

completely unreasonable increase in density. Building under the current zone with ADUs would allow Ivory to achieve their stated objective, increase the city's housing stock and variety, while not over developing the property rendering it incompatible with the neighborhood.

I most respectfully request that both the rezone and the planned development be denied.

Yours sincerely,

Peter Wright

Chair, Preserve Our Avenues Zoning Coalition

APPENDIX 1

21A .55.050 STANDARDS FOR PLANNED DEVELOPMENTS

This section of the planned development ordinance prescribes requirements that the applicant must satisfy to be granted a planned development. Ivory fails on a large number of them; the principal areas of deficiency are listed below.

Planned Development Objectives

This section requires that a planned development meet the purpose statement for a planned development 21A.55.010. One key requirement is that; *“A planned development will result in a more enhanced product that would be achievable through strict application of land use regulations, while enabling the development to be compatible with adjacent and nearby land developments”*.

Ivory’s proposal fails on both elements of the above requirement, (a) there is no enhanced product, the benefit they claim of building ADUs in bulk as original construction can be achieved without a planned development; and (b) their proposed development is not compatible with adjacent and nearby land developments.

21A.55.050.A also requires that; *“The applicant shall also demonstrate why modifications to the zoning regulations are necessary to meet the purpose statement for a planned development.”* Ivory has failed to address this requirement and has offered no such explanation.

Ivory does not meet the requirements of the planned development purpose statement.

A. Master Plan Compatibility

Ivory’s proposal is clearly not compatible with the Avenues Community Master Plan which designates this area as Very Low Density(1-4 units per acre), now FR-3/ Foothills Residential District, hence Ivory is requesting a rezone and an amendment to the master plan as a part of this application. While the more recent *Growing Salt Lake City Five Year Plan* does advocate for infill and ADUs, it also notes the importance of density being added to “walkable” sections of the city, close to jobs, mass transit and amenities.

Since this project focuses heavily on the construction of ADUs it seems pertinent to also consider the purpose statement of this ordinance. 21A.40.200.A.7, in considering where ADUs should be added, states; *“Support sustainability objectives by increasing housing close to jobs, schools and services thereby reducing greenhouse gas emissions and fossil fuel consumption.”* Also, section 21A.40.200.A.8. states: *“Support transit oriented development and reduce auto usage by increasing density near transit”*. This Upper Avenues, suburban, foothills location is not a “walkable”

section of the city. Public transport is minimal, there are few amenities, the nearest supermarket, Smiths, is seven blocks away down a steep grade with intermittent sidewalks. Two adult families by necessity will own and operate two private automobiles adding additional traffic to the Avenues already busy streets and to Capitol Park Avenue a private road that was constructed to handle the limited volume of the existing low-density development.

Ivory's proposal is not compatible with either the Avenues Community Master Plan or The Growing Salt Lake City Five Year Plan. It also violates a key component of the ADU ordinance with regard to location and "walkability".

There are a large number of errors in the section of Ivory's application titled "CAPITOL PARK COTTAGES PLANNED DEVELOPMENT APPLICATION" that should be corrected. On page 1, paragraph 2 of this section Ivory states that; *"The vacant land has a zone that limits its development to nine one third-acre estate lots"*. This is incorrect, the plot is zoned FR-3/ 12,000 Foothills Residential District and will accommodate up to eleven lots.

On page three the section titled **Consistency with Avenues Master Plan** is almost entirely incorrect and misleading. In paragraph 3 of this section Ivory states; *"The property is adjacent to the historic Veterans Administration Hospital and was designated as a foothills 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)."* While the first sentence is correct the second sentence that the entire surrounding area was designated as LD (4-8 units/acre) is incorrect. The area to the north, east, south, and west of 675 North F Street were all designated as VLD (1-4 units/acre) on the 1987 Future Land-Use Map. See Figure 1, where 675 North F Street is shown in purple.

In paragraph 4 of this section Ivory seeks to assert that the entire nature of the area adjacent to 675 North F Street has changed since this 1987 Land-Use Map was produced; this is again incorrect. Northpoint was constructed in the 1984/5 period and therefore existed at the time this map was produced. The block to the east of 675 North Street was also built prior to 1987 and is largely unchanged, Capitol Park to the west was built in the 1996/7 period and was constructed under FR-3 zoning, VLD (1-4 units/acre) being the precursor to the FR-3 zone designation created in 1995. Hence the current land use on three of the four sides of Ivory's property is unchanged from that envisaged or existing when the 1987 map was adopted. The only exception is the conversion of the Veterans Administration hospital from a non-residential to a residential use in 2006.

In the final paragraph of this section Ivory makes the statement, "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.” This statement is entirely incorrect. Current land-use is very much in-line with the **intent** of the 1987 Master Plan.

In 1995, a number of new zoning designations were introduced with the Very Low Density (1-4 units/acre) being replaced with FR-3/ 12,000 Foothills Residential zoning, the zoning that exists today for 675 North F Street. Thus in 1995 the city planners **reaffirmed** the designation of 675 North F Street as belonging in the Very Low Density category. Simultaneously in 1995, the block section of the Avenues designated as Low Density (4-8 units/acre) in the 1987 Master Plan was changed to SR-1. This was later amended to SR-1A in 2006, such that SR- 1 zoning no longer exists in the Avenues. One of the reasons for the change from SR-1 to SR-1A was to reduce the bulk of tall buildings on lots in the lower Avenues that did not meet the 50 feet width minimum, exactly the condition Ivory is seeking to create in his development. There can be no justification for reverting to SR-1 zoning, granting an increase in height of a further five feet over SR-1A, particularly in the context of this high bulk development.

Ivory makes no case for an Amendment to the Avenues Community Master Plan; almost the entirety of their supposed justification is factually incorrect. The application for an amendment to the Master Plan should be denied.

B. Design and Compatibility

This section of the ordinance prescribes criteria to be considered in assessing the compatibility of the proposed planned development with the neighborhood in which the planned development will be located.

Section 1. “Whether the scale, mass and intensity of the proposed planned development is compatible with the neighborhood where the planned development will be located...”

Ivory’s proposed development will be a complete misfit and is not at all compatible with the neighborhood in this Upper Avenues location.

- It is of far greater density than any of the immediately adjacent developments, Northpoint, Capitol Park, the Meridien and the adjacent block to the east, zoned SR-1A.
- Northpoint, Capitol Park and the adjacent block on F Street all conform to FR-3 density.
- The only exception to FR-3 zoning in the area is the Meridien/Wright Building where a special exception was made to preserve these beautiful 1930’s neoclassical buildings that are listed on the National Register of Historic Places. Density in these buildings was strictly controlled by a development agreement with the city and the density is far less than indicated by Ivory.
- 5000 square foot lots are not common anywhere in the Upper Avenues and there are no blocks nearby where the majority of lots are at this minimum level, yet alone smaller.

- Perimeter setbacks are not at all typical of homes in this locale and are intrusive.
- Nearby blocks have front and corner yards that include city right-of-way, providing a greater yard dimension from street to dwelling. Absent this space and absent sufficient front setbacks, Ivory's dwellings will crowd the roadway, compounding an overly dense appearance. Lot building coverage is also totally different from nearby properties.
- Of great concern is the grading method Ivory is proposing in order to build on this lot that slopes both north/south and east/west. Their plan proposes to level the lot into large terraces of approximately 100 X 100 feet accommodating multiple buildings. The need for such large platforms is driven by their overly dense design with paired homes and conjoined driveways. This in turn leads to the requirement for large retaining walls running north/south and east/west. **Figure 2. Ivory's Grading Plan Scars the Hillside**, shows the number and location of these large retaining walls. While this design with paired homes might be reasonable on a flat building site, it does not work on this sloped plot. Rather than work with the natural topography of the site Ivory choose to destroy it. Ivory's design scars the hillside in a manner that is totally unprecedented in the Avenues. This unreasonable and inappropriate design to accommodate increased density, demonstrates why this lot was zoned FR-3 low density development by earlier professional planners.

The scale, mass, intensity and overall design of Ivory's proposed development is not compatible with the existing neighborhood.

Section 2. "Whether the building orientation and building materials in the proposed planned development are compatible with the neighborhood where the planned development will be located..."

Throughout the entirety of the Avenues in both the SR-1A block zone and the FR-3 zone, with very few exceptions, the front of each residence faces the street. This is not the case with Ivory's proposed development where nearly all of the buildings in the enclave section have either a side or rear profile facing Capitol Park Avenue. This includes lots 8,9,10,12,17,18,19 (multi-gen, side profile) and lots 6,7(cottage duets, rear profile). Of particular concern are the aesthetics of the multi-gen units 8 and 19 which abut Capitol Park Avenue. See the Elevations section, drawing 2. These side elevations are particularly large and plain with few windows or added design elements. Please visualize these units interspersed with large retaining walls; the bulk effect is overwhelming.

Ivory has provided no information on building materials, but it is probably safe to assume that these side elevations will be of lower cost, less attractive materials than the front elevations.

The building orientation in Ivory's design is not compatible with the neighborhood and they are non-compliant regarding the provision of information on building materials.

3. "Whether building setbacks along the perimeter of the development":

a) "Maintain the visual character of the neighborhood."

There are four boundaries, to the north is the boundary with Northpoint, here the proposed setbacks as low as 10 feet are significantly less than the 25 feet required by the SR-1 ordinance. This gives rise to considerable structural and safety concerns since Ivory plans to construct large retaining walls in this setback. Northpoint fears this may lead to undermining the foundations of their boundary wall which runs close to the road that forms their only route of ingress and egress.

Front setbacks for the custom home lots to the east with F Street at 20 feet are within code, but considerably less than every one of the existing homes on the opposite side of the street. These buildings will crowd the road and will lead to an unbalanced appearance.

Setbacks to the south on the units bordering Capitol Park Avenue, particularly unit 19, is not in keeping with front setbacks in this neighborhood; directly opposite is the Meridien which has extensive landscaping with offsets of around 50 feet. Front yard setbacks for the single-family homes along Capitol Park Avenue, although varied, in general exceed the 20 feet requirement

The rear yard setbacks for lots 17-19 should be 25 feet (25% of lot length) and Ivory does not meet this code requirement.

The reduced offsets on the perimeter of the proposed planned development do not maintain the visual character of the neighborhood.

Please see figures 1 and 2 on following pages.

This site plan illustrates the layout of 19 lots, each with a Total Occupancy Factor (TOF) and area. The lots are arranged in a grid-like fashion, with some lots (1, 2, 3, 4, 18, 19) located along the right and bottom edges. The plan includes a network of streets, including a 15' RCP SD (Sanitary Drain) line and a 15' RCP SD line. Retaining walls are shown as dashed lines, with one wall labeled 'RETAINING WALL (TYP.)'. The plan also features a '100-YR DRAINAGE PATTERN (TYP.)' and a 'PARCEL B' area. The TOF values for the lots are: Lot 1 (TOF: 4885, 8,252 SF), Lot 2 (TOF: 4876, 5,841 SF), Lot 3 (TOF: 4866, 5,841 SF), Lot 4 (TOF: 4858, 5,841 SF), Lot 5 (TOF: 4877, 6,270 SF), Lot 6 (TOF: 4869, 4,280 SF), Lot 7 (TOF: 4864.5, 4,286 SF), Lot 8 (TOF: 4867.5, 4,286 SF), Lot 9 (TOF: 4851.5, 4,576 SF), Lot 10 (TOF: 4867, 5,267 SF), Lot 11 (TOF: 4851.5, 4,489 SF), Lot 12 (TOF: 4871, 5,147 SF), Lot 13 (TOF: 4871, 5,106 SF), Lot 14 (TOF: 4866, 4,609 SF), Lot 15 (TOF: 4866, 6,629 SF), Lot 16 (TOF: 4852, 5,544 SF), Lot 17 (TOF: 4866, 6,843 SF), Lot 18 (TOF: 4851.5, 6,756 SF), and Lot 19 (TOF: 4851.5, 6,756 SF). The plan also includes a 'PARCEL A' area (17,432 SF) and a 'PARCEL B' area (3,146 SF). The plan is titled '1 RETAINING WALLS' and includes a scale of '1" = 50'-0"' and a north arrow.

Echeverria, Daniel

From: Linda Tanner TANNER <[REDACTED]>
Sent: Wednesday, December 29, 2021 4:44 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; Alan Hayes
Subject: (EXTERNAL) Subject: Petition Numbers: PLNPCM2020-00334/00335, PLNPCM2021-00656, PLNSUB2021-01175; Zoning District: FR-3/12,000 (Current), SR-1 (Proposed)

December 28, 2021

Daniel Echeverria ([REDACTED])

Cc: Peter Gamvroulas
Chris Wharton

Subject: Petition Numbers: PLNPCM2020-00334/00335, PLNPCM2021-00656, PLNSUB2021-01175;

Zoning District: FR-3/12,000 (Current), SR-1 (Proposed)

I am writing this letter in response to Ivory Development's request to develop a 19—lot single family dwelling development on the property located at approximately 675 N F Street. This would require a zoning amendment to this location.

As a homeowner located in the Avenues, I adamantly oppose this request. As the Avenues are a historic district in Salt Lake City, I feel that allowing this rezoning request to go through would jeopardize the wonderful and unique character of this neighborhood.

There are many reasons this should not be allowed to happen:

1. The request Ivory is making is far too dense (19 buildings). Not one of the requested 19 lots meet reasonable setback requirements. They are also selling it as affordable housing – how many lower income people do you know that can build a home at the starting price of \$800,000 – not any that I know.
2. SR-1 zoning does not exist in the Avenues. If this zoning is changed, it would allow for taller and denser buildings in the area. There are already rumors that LDS Hospital may be building a new hospital in the downtown area and that high rise apartments will be going in where the hospital is now located.
3. Traffic: the development would add approximately 70 more cars to this area. Since public transportation to this area ends at 8:00 pm and does not operate on weekends, many of the residents would require 2 cars.
4. People who purchased homes adjoining this lot would be severely impacted and their quality of life threatened. When they decided to build their homes, they trusted YOU (their elected officials) to protect their rights including represent zoning, and they have been paying taxes

accordingly to Salt Lake City. You now see For Sale signs popping up in this area as a result of this rezoning request.

5. Capitol Park Avenue is a private road, owned by Capitol Park and The Meridien. When the residents petitioned the City to take ownership of this road, they refused stating that the street was too narrow and did not meet the City requirement standards. I am not aware that there have been any changes to the road. Now they want these homeowners to allow access for these via privately-owned Capitol Park Avenue thus submitting to the request of the developers.
6. Traffic would greatly increase in an area where there are already problems with the number of cars in the area jeopardizing the safety of residents and especially children. I also doubt that there would be enough access to a home in the development should a fire happen.
7. It now seems as though the interests of developers and the church outweigh the wishes of the people who elected them.

This area would have been a wonderful park, allowing the residents to enjoy the surroundings and the multitude of wildlife that now reside there to continue to thrive. It would have been wonderful if the church had sold or given this property to the City.

As elected officials, I hope you will remember that you were elected by the people of Salt Lake City and the Avenues Neighborhood and to represent them rather than submitting to the developers.. You were to be our protectors.

Hoping you will do the right thing for the residents of the Avenues.

Sincerely,

Linda Hasler-Tanner
373 East 9th Avenue
Salt Lake City, UT
[REDACTED]

Echeverria, Daniel

From: Dolly Peach <[REDACTED]>
Sent: Wednesday, December 29, 2021 1:45 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Opposed to Avenues Rezone on Capitol Ave

Dear Mr. Echeverria,

I am opposed to the Ivory Homes rezone in the Avenues. There is already a problem with parking in the Avenues and we did not move here expecting high density developments to increase congestion to the small streets. Please reject the proposal and allow Land conservation organizations to get involved in preservation of the natural space.

Thank you,
Dolly Peach

Echeverria, Daniel

From: Rhett Davis <[REDACTED]>
Sent: Wednesday, December 29, 2021 11:56 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Development on Capitol Park Avenue

December 20, 2021

Daniel Echeverria
Senior Planner
Salt Lake City Corp.
[REDACTED]

Re: Ivory Development on Capitol Park Avenue

Dear Mr. Echeverria,

We are residents of the upper Avenues community and have been since 2013. We have two children under the age of five and often find ourselves out with bikes, scooters or strollers walking to play with friends or to Ensign elementary to play on the playground. The lack of sidewalks in the upper avenues along 13th and 12th Avenue make our family's travels within our neighborhood more dangerous, especially in winter months when, due to snow buildup on the side of the roads, we are forced to walk in the middle of the road.

We oppose Ivory's revised plan principally because of the density it will bring, with more vehicles in the area meaning more danger for our family.

Please consider the safety of Upper Avenues existing residents when considering a higher density re-zoning to the lot on Capitol Park Avenue.

Thank you,

Rhett and Katie Davis
962 E North Bonneville Dr
Salt Lake City UT 84103

Echeverria, Daniel

From: Julia Rossi <[REDACTED]>
Sent: Tuesday, December 28, 2021 4:44 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Preserve our Avenues Zoning

Mr. Echeverria
Planning Divisions
Salt Lake City, UT

December 27, 2021

re: Ivory Homes proposed development at 675 North F Street

I would like the Salt Lake Planning Committee to consider what I believe to be a very serious and rather overlooked consequence of rezoning this property; the threat of wildfires.

I live in Northpoint along with 50 other homeowners. Our community, like all communities, needs unfettered access to emergency vehicles, equipment and personnel. Because we only have one exit, we also need an evacuation plan that is speedy and safe. Adding the proposed number of residents directly below our gates is more than thoughtless, it's dangerous.

Frankly, I'm rather shocked that the city would even consider such a proposal given our situation. A *planning committee* has a duty to consider more than the housing shortage when giving the nod to rezoning requests. Lives may depend on it.

This is an important issue for the entire Avenues.

Sincerely

Julia Rossi
1807 N Juniperpoint Dr
Salt Lake City, UT 84103

Echeverria, Daniel

From: Linda Tanner TANNER <[REDACTED]>
Sent: Tuesday, December 28, 2021 2:01 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Avenue Rezoning Request

December 28, 2021

Daniel Echeverria ([REDACTED])

Cc: Peter Gamvroulas
Chris Wharton

Subject: Petition Numbers: PLNPCM2020-00334/00335, PLNPCM2021-00656, PLNSUB2021-01175;

Zoning District: FR-3/12,000 (Current), SR-1 (Proposed)

I am writing this letter in response to Ivory Development's request to develop a 19—lot single family dwelling development on the property located at approximately 675 N F Street. This would require a zoning amendment to this location.

As a homeowner located in the Avenues, I adamantly oppose this request. As the Avenues are a historic district in Salt Lake City, I feel that allowing this rezoning request to go through would jeopardize the wonderful and unique character of this neighborhood.

There are many reasons this should not be allowed to happen:

1. The request Ivory is making is far too dense (19 buildings). Not one of the requested 19 lots meet reasonable setback requirements. They are also selling it as affordable housing – how many lower income people do you know that can build a home at the starting price of \$800,000 – not any that I know.
2. SR-1 zoning does not exist in the Avenues. If this zoning is changed, it would allow for taller and denser buildings in the area. There are already rumors that LDS Hospital may be building a new hospital in the downtown area and that high rise apartments will be going in where the hospital is now located.
3. Traffic: the development would add approximately 70 more cars to this area. Since public transportation to this area ends at 8:00 pm and does not operate on weekends, many of the residents would require 2 cars.
4. People who purchased homes adjoining this lot would be severely impacted and their quality of life threatened. When they decided to build their homes, they trusted YOU (their elected officials) to protect their rights including represent zoning, and they have been paying taxes accordingly to Salt Lake City. You now see For Sale signs popping up in this area as a result of this rezoning request.
5. Capitol Park Avenue is a private road, owned by Capitol Park and The Meridien. When the residents petitioned the City to take ownership of this road, they refused stating that the street

was too narrow and did not meet the City requirement standards. I am not aware that there have been any changes to the road. Now they want these homeowners to allow access for these via privately-owned Capitol Park Avenue thus submitting to the request of the developers.

6. Traffic would greatly increase in an area where there are already problems with the number of cars in the area jeopardizing the safety of residents and especially children. I also doubt that there would be enough access to a home in the development should a fire happen.
7. It now seems as though the interests of developers and the church outweigh the wishes of the people who elected them.

This area would have been a wonderful park, allowing the residents to enjoy the surroundings and the multitude of wildlife that now reside there to continue to thrive. It would have been wonderful if the church had sold or given this property to the City.

As elected officials, I hope you will remember that you were elected by the people of Salt Lake City and the Avenues Neighborhood and to represent them rather than submitting to the developers.. You were to be our protectors.

Hoping you will do the right thing for the residents of the Avenues.

Sincerely,

Linda Hasler-Tanner
373 East 9th Avenue
Salt Lake City, UT
[REDACTED]

December 28, 2021

Dear Mr. Echeverria,

I am a resident at the Meridien in Capitol Park and oppose the Ivory new zoning request to SR-1 for the following reasons.

- The City's 5 year housing plan states high density development need to be in walkable areas to markets, shops, business's which this development does not.
- The City is in need of affordable housing and this development clearly does not fit into the definition of affordable.
- The level of density in the proposed development is greater than any existing development in the vicinity and no other SR-1 exist in the Avenues
- Public transportation option are limited and inconvenient which will result in families adding upward to 70 automobiles for school children to navigate through.
- Capitol Park Ave is a private road owned by Capitol Park Association and the Meridien. The City has stated that it does not meet the requirements of the City to be a public city street and further adding concerns to the density of this development.
- There is overwhelming neighborhood opposition to the SR-1 zoning change for a high density development that I would hope the City will take into consideration.

Thank you for your time and consideration.

Sincerely
Todd Jensen
400 E Capitol Park Ave #301
Salt Lake City, UT 84103

Echeverria, Daniel

From: Jack Hamilton <[REDACTED]>
Sent: Tuesday, December 28, 2021 12:52 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) RE: Opposition to Ivory Homes Application to Re-zone 675 North F Street

Dear Mr. Echeverria:

Please add my name to those opposed to the proposed re-zoning of 675 North F Street for the benefit of Ivory Homes. As I am sure that you are aware, more than 20 compelling arguments have been made against this project which will be detrimental, not only to Avenues residents, but to Salt Lake City as a whole. I won't enumerate all those points but I will add that as Utah's largest home builder and developer, the perception is that Ivory will use its considerable political influence to clear the way for variances for lot size, setbacks, density, environmental and virtually every other building requirement that contributes to the quality of life that Avenues residents now enjoy.

As a resident of the Avenues for more than 30 years and living just two blocks from the proposed re-zoning I am adamantly opposed to it, as is the vast majority of Avenues residents. We only ask that the existing regulations, which are excellent, be enforced and followed by Ivory Home instead of altering them to the detriment of the neighborhood and the city and for the sole benefit of Ivory Homes.

Yours truly,

Jack Hamilton
680 Northcrest Dr.
Salt Lake City, UT 84103

Echeverria, Daniel

From: Amber Skolnick <[REDACTED]>
Sent: Tuesday, December 28, 2021 11:59 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Preserve our Avenues Zoning, Saying No to the Rezone

To whom it may concern:

I am writing this email to say no to the rezone proposed by Ivory Homes in the upper avenues. I have lived in the Avenues for 25 years and I have lived across the street from the plot in question for almost 4 years. The plan that Ivory has come up with doesn't fit in with the way the rest of the Avenues was designed. We are not a high density area like some of the newer communities in the valley. The Avenues is a historic neighborhood and I think that it's important to preserve the quaint character we have. Ivory homes doesn't seem to care about this as they want to fit as many houses as possible with money being their bottom line. I think the original zoning plan of 11 plots is a reasonable number of homes to fit into the area. I am sad to see the green space of the plot disappear as we see many hawks and their nests from our window. I understand that this land is for sale, but I do not think that a developer should be able to come in and almost double the original zoning without care to what the neighborhood thinks. Please consider the way the community feels about their neighborhood and stick with the plan of the original 11 plots.

Thank you,
Amber Skolnick
400 E Capitol Park Ave, Unit 503

Alan Hayes
973 Northpoint Ct.
Salt Lake City, UT 84103
December 28, 2021

Daniel Echeverria, Senior Planner
Salt Lake City Planning Division

RE: Ivory Homes application to rezone 675 F Street

Dear Mr. Echeverria,

Let me give you a simple set of numbers for comparison of housing density: 3, 2, 1.

Ivory Homes has consistently downplayed the density of their development in both their application for the rezone in conjunction with a planned development and in their marketing materials. Ivory appears to be taking advantage of the provision in the 2018 ADU Ordinance that ADUs do not count towards density. It appears that Ivory does not want to admit that an ADU is really a dwelling unit, as the very name signifies; thus, they do not count ADUs in their cottage enclave lots as dwellings in their density numbers. I think any reasonable person would disagree, setting aside the stipulative legal definition in the ordinance. Ivory's ADUs are dwellings for a separate household, have a separate address, have garages and driveways for an automobile, and have all the other characteristics of a separate place of residence.

So, if you accept that obvious reality then here is how 3,2,1 comes in:

Let's use FR-3 without ADUs as the measuring stick for simplicity. Twelve thousand square feet of land per dwelling would allow 11 homes on the Ivory lot. Ivory Homes wants to build 33 dwelling units on this 3.2 acres. Rounded, that is three times the density of FR-3. There's the three.

The Meridien, the refurbished 1932 VA Hospital, contains 26 separate condos on 3.86 acres. (Not 57 as Ivory asserts.) That is about twice FR-3. There's the two.

Northpoint, the 49-condo complex to the north, is on 13.2 acres. That's very close to FR-3. There's the one.

The adjacent block of SR-1A to the east across F Street is also very close to FR-3. Another one. Capitol Park homes to the west conform to FR-3, so that's another one.

Ivory's proposed development has three times the number of housing units per acre as those on three sides of it: Northpoint, blocks to the east across F Street, and Capitol Park homes.

The Meridien has only two times the dwelling units as FR-3 despite the fact it was originally built to house recovering veterans while it was in operation from 1932 to 1961. There is no question that it is a large building, but it does not contain as many households as you would expect.

3, 2, 1. Ivory's proposed development is the three.

Sincerely,

Alan B. Hayes

Echeverria, Daniel

From: Gary <[REDACTED]>
Sent: Monday, December 27, 2021 7:52 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Homes application to change the zoning in the Avenues

Mr. Echeverria,

I am writing about the application made by Ivory Homes to change the zoning in our neighborhood to enable them to develop and build a profitable development at the cost of the surrounding neighbors.

In theory, this project is being done to provide more affordable housing in the area. As you know, the cost of these homes is planned to be well above what virtually any person would consider affordable.

As I understand it, the zoning designation Ivory has requested is suitable for urban transportation corridors with significant commercial activities nearby. This area of the Avenues is completely unlike that with only limited bus service on 11th Avenue and no commercial or retail activities within walking distance.

The impact of this request is already being felt in our neighborhood. I am aware of five homes that have sold or are currently on the market as a direct result of the threatened rezoning.

What is happening here is quite simple. Ivory is doing this development to make money. Those of us who live in the neighborhood will enable Ivory's profitability through a reduction in the value of our properties that were purchased in the belief that we could rely on the zoning in our neighborhood.

I urge you to reject this unprecedented destruction of property values for tax-paying residents for the benefit of a developer who is unwilling to buy and develop property on the same basis that we have. I have no objection to the property being developed. I object to the rezoning.

All the best,

Gary Crittenden

Echeverria, Daniel

From: Jaron Robertson <[REDACTED]>
Sent: Monday, December 27, 2021 9:13 AM
To: Echeverria, Daniel; Wharton, Chris
Cc: [REDACTED]
Subject: (EXTERNAL) Opposition to Ivory Homes Application to Re-zone 675 North F Street

To whom it may concern,

As a longtime resident of the Avenues neighborhood, I am writing in strong opposition to the proposed Ivory Homes application to rezone 675 North F Street from FR-3 to SR-1.

The Avenues has clearly defined zoning requirements to preserve the historical integrity of the neighborhood and the investment so many residents have made to preserve their homes and the history of this community. The proposed development disregards established requirements to maximize profits over community. As an established builder in Utah, Ivory Homes should be capable of developing the lot within established zoning requirements and not treat the Avenues like another Draper or Herriman.

Allowing the rezoning diminishes the integrity of the neighborhood, adds a significant amount of vehicles, is a high density non-walkable area, and breaks faith of the residents who have consistently conformed with existing zoning regulations.

I hope you please consider these concerns and the voices of the over 1,000 residents who have already voiced their opposition.

Jaron Robertson
567 E 10th Ave

Echeverria, Daniel

From: Hala Toubbeh <[REDACTED]>
Sent: Monday, December 27, 2021 9:08 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Opposing the Avenues Ivory Homes Rezone Petition

Dear Mr. Echeverria,

As a resident of the Avrnues, I oppose the Ivory Homes rezone. The avenues is already physically stressed from infrastructure aging, density of housing and services available to meet current demographic needs.

The Ivory Homes Capitol Park development will bring excess vehicles, worsen pollution in an already vehicle-dense zone, stress current aged infrastructure, and serve to raise local vendors' prices for goods and services above and beyond what Covid has already done to pricing structures in Salt Lake and beyond.

The Avenues additionally contains a socioeconomically well-mixed demographic that supports Salt Lake City's imperative to bring affordable housing to all. This mix makes the neighborhood dynamic, economically strong and unified in its appeal to attract new residents to already existing housing. To bring in a costly new housing development is to change the fabric of this vibrant, self-sustaining and sustainable community, and to begin a process of skewing a demographic that disrupts the character of the neighborhood, much less changes the entire economics of the Avenues.

I oppose the Ivory Homes rezone petition and Capitol Park development.

Hala Toubbeh MD

Echeverria, Daniel

From: Jane Mangelson <[REDACTED]>
Sent: Monday, December 27, 2021 8:42 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Home's development in the Avenues

Dear Mr. Echeverria,

I am writing to you again regarding my opposition to Ivory Home's development in the upper Avenues of SLC. This morning I read an article in the SL Tribune titled, "UTAH'S HOUSING CRISIS: COULD AND ANSWER BE IN YOUR BACK YARD?"

I immediately knew that this article would be addressing the promotion of ADUs. In previous emails to you, I have stated the many reasons why the Ivory Homes development, which would require a drastic change in zoning, should not be allowed in our neighborhood. I will not elaborate on all of them again, but I would like to address the SL Tribune article and its false portrayal of ADU's being affordable housing, especially in this new development.

In the article, a young man from L.A. is interviewed about his struggle to find affordable housing in the SLC area. The answer to his woes came in an experimental type of housing in the Midvale area, developed by Ivory Homes. He was able to purchase a new home with an ADU for \$735,000. What wasn't mentioned is that his parents bought the house for him. I know the young man and his parents and, while I am happy that he was able to find a house in this difficult market, this purchase should not be given as an example of affordable housing! He could not afford it so his well-off parents purchased it.

While I do believe there is a place for ADUs in our valley, the Avenues is not one of them. Our neighborhood is landlocked with not enough services, and the idea that this should be considered affordable housing is not a sound argument! The houses and ADUs would be very unaffordable - far more expensive than the Midvale development. I think this is an excuse for Ivory Homes to put many houses in a small space and increase their revenue greatly. They should not be promoted as being altruistic in the plans to help the community with affordable housing.

I ask you to please consider the neighborhood that you are allowing this re-zoning to take place in. This established neighborhood with limited space and services, that backs up against our foothills on a dead end street, is not the place for Ivory's experimental housing project. I hope you will represent the citizens, who clearly oppose this, rather than the home building business that is ultimately interested in making money.

Sincerely,

Jane Mangelson
Avenues homeowner for 25 years

Echeverria, Daniel

From: Connie Hancock <[REDACTED]>
Sent: Sunday, December 26, 2021 7:59 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) 675 North F Street Rezone Opposition

To: Daniel Echeverria
Senior Planner, Salt Lake City Council

We, Wayne and Connie Hancock, strongly oppose the proposed rezone of 675 North F Street. We have owned and lived in one of the Northpoint condos at the top of F street for the past several decades. F street from 11th Avenue north was not designed to handle the cars and traffic that will be realized should the zoning change. It is already a narrow street to navigate as it is when cars are parked along the side. By comparison, I street from 11th Ave North was in fact designed for more traffic. We invite those on the committee who will be voting on this change to come and drive on F street from 11th Ave north towards the proposed Ivory Home development. Please do this during different times of the day and weather conditions to see how the increased parking and traffic with a rezone will impact the safety in the area.

Regards,

Wayne & Connie Hancock

Echeverria, Daniel

From: Richard Schmidt <[REDACTED]>
Sent: Sunday, December 26, 2021 3:36 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Rezoning application for Lot 675 N. F Street, Salt Lake City

Dear Mr. Echeverria,

Ivory Homes has now presented some revisions of their development plans for their lot at 675 N F Street, SLC. I have reviewed their revisions and continue to be strongly against their request for rezoning on this lot. I am copying for you below my original letter to you in regard to their initial application. All of the issues that I raised in that letter are still unresolved issues with Ivory's latest plan. In short, they are putting too many residences on a lot in an area that cannot handle that type of development density. This area is too far removed from walkable city amenities to offer any advantage for high density development, nor is there sufficient public transportation to mitigate this. The streets are narrow and hilly in this neighborhood so it is not suitable for pedestrian or even bicycle access to downtown, and the increased motorcar traffic will create both a mess and a hazard to all the surrounding residents and their children.

Simply stated, this development does not belong here.

I hope that the city council will unreservedly vote against any rezoning application and maintain the current zoning status.

Thank you for bringing these issues to the City Council

Sincerely,

Richard H. Schmidt
344 E. Charity Cv, Salt Lake City
[REDACTED]

[Copy of previous letter follows:]

Re: Rezoning application for Lot 675 N. F Street, Salt Lake City

Dear Mr. Echeverria,

I live in the neighborhood that will be impacted by the proposed rezoning for the property located in the upper avenues at the corner of F Street and Capital Park. I am writing to express my vehement opposition to the rezoning request by Ivory Homes to allow high density urban development in an area that is really suited only for its current suburban FR-3 designation. I base my opposition on the following points.

The Ivory proposal is entirely out of character for the location. Unlike areas that are far more appropriate for a high density urban development, there are no walkable commercial services, stores or restaurants in the vicinity, and bus routes are limited to a single line about 1/3 mile away with no evening or night service.

The large number of new residences in this development would thus bring vastly increased traffic to an area that has mostly cul de sacs and few through roads. The roads themselves are narrower than ordinary Salt Lake City standards. Maintenance of the roads in the Capital Park area and their underground utilities are the responsibility of our local HOA, and it is beyond fairness to burden our community with the unnecessary and ill-conceived overload that this development would bring. The narrower than standard streets already has raised concerns that access for emergency

service vehicles may not be sufficient, and this development vastly aggravates that situation. Since the development doesn't adequately provision for visitor parking, this road situation will be made even more critical.

Lastly, such a high density development is just not necessary to make for commercially successful use of the property in this area. This is a desirable residential area and I see no reason that Ivory or whoever develops the lot cannot do so viably under its current zoning designation. This would significantly reduce the problems that the higher density development would inevitably cause, and prevent a huge negative impact to the surrounding community.

I trust that you and the planning commission will carefully consider these points, and the fact that because of these issues, there is overwhelming and justified community opposition to the Ivory development and the proposed rezoning.

Sincerely,

Richard H. Schmidt, 344 Charity Cv, Salt Lake City

[REDACTED]

Echeverria, Daniel

From: Cathy Babcook <[REDACTED]>
Sent: Saturday, December 25, 2021 1:06 PM
To: Wharton, Chris; Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) Ivory Homes rezoning request in the Avenues

As a long term resident in the neighborhood, I am opposed to the Rezoning requests of Ivory Homes.

a. Ivory is seeking a rezone from the current FR-3 zoning which has a minimum lot size of 12,000 square feet to SR-1 which has a minimum lot size of 5000 square feet. Under current FR-3 zoning the maximum number of primary residences is 11; Ivory is requesting 19. b. In combination with the rezone to gain more lots, Ivory also seeks to add an Accessory Dwelling Unit (ADU) to at least 14 of these lots for a total of 33 dwellings, a 300 percent increase.

The request would result in a level of density that is greater than any existing development and too high for this foothills location. I have concerns about water runoff, increased traffic and lack of infrastructure to support this density.

I am particularly concerned about further destruction of wildlife habitat and disruption of the red-tailed hawks nesting site in mature trees.

Please do not permit this zoning change and building by Ivory Homes.

Thank you, Catherine Babcook MD

Echeverria, Daniel

From: JOHN HOFFMANN <[REDACTED]>
Sent: Friday, December 24, 2021 4:44 PM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Fwd: Ivory homes development at 675 N F street

My apologies- I accidentally sent this letter before it was complete. To continue...

The proposed development is far too dense. This poses safety concerns for pedestrians, nearby elementary school students and current residents. The existing Capitol Park Avenue is already too small for city standards given the number of current residents. Adding another 70 cars from this proposal is frightening and irresponsible. There are no comparable developments anywhere in the Aves. This density also will be detrimental to wildlife that access city creek canyon in this area.

There is insufficient infrastructure in this area. There is only one grocery store in all the avenues. There is only one nearby fire station on 11th ave. Almost all the narrow streets in the avenues are choked with parked cars. This reduces visibility at intersections, and increases the risk of collisions with vehicles, cyclists and pedestrians. It also makes it difficult for snowplows and public buses to safely do their work. There is limited public transit especially given the recent cutbacks on bus route 11. This development in near the entrance to City Creek canyon which is busy year round. Adding 70 new cars imperils all the current residents and worsens noise and air pollution.

Previous petitions have clearly demonstrated **overwhelming** opposition to the zoning change- from all parts of the Aves not just those near the Ivory plot. This zoning SR-1, does not exist anywhere in the Avenues - for good reason. Ivory's request for a PD is a blatant effort to circumvent the zoning change so vehemently opposed by current residents. This proposal does not conform to the City's long term Housing plan nor will it provide "affordable" housing. The Avenues area is one of the most expensive areas in all of the Salt Lake valley. It is foolish to assume that the new Ivory houses would not be similarly priced and it has been estimated that these unit will be priced at over \$1M. This project will only benefit Ivory Home's greed and profit at a great cost to the entire Avenue area and residents. It is likely that the Ivory development will adversely affect the value of nearby homes.

For all these reasons, I stand with my Avenues neighbors and strongly oppose and condemn this proposal.

John Hoffmann
504 E 13th Ave
Salt Lake City, UT 84103

----- Original Message -----

From: JOHN HOFFMANN <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
<[REDACTED]>
Date: 12/24/2021 3:43 PM
Subject: Ivory homes development at 675 N F street

I am writing today to strongly oppose the rezone from FR-3 to SR-1 for Ivory Homes st 675 N F Street.

We first moved to the Avenues in 1983. We have lived in several homes through the years in different areas in the Aves. **Never** have we seen a development so

inappropriate for the Avenues as this Ivory proposal. This development poses significant safety issues, wildlife and environmental concerns, negative impacts on property values as well as esthetic concerns.

Echeverria, Daniel

From: JOHN HOFFMANN <[REDACTED]>
Sent: Friday, December 24, 2021 3:44 PM
To: Echeverria, Daniel; Wharton, Chris
Subject: (EXTERNAL) Ivory homes development at 675 N F street

I am writing today to strongly oppose the rezone from FR-3 to SR-1 for Ivory Homes st 675 N F Street.

We first moved to the Avenues in 1983. We have lived in several homes through the years in different areas in the Aves. **Never** have we seen a development so inappropriate for the Avenues as this Ivory proposal. This development poses significant safety issues, wildlife and environmental concerns, negative impacts on property values as well as esthetic concerns.

Echeverria, Daniel

From: Margo Becker <[REDACTED]>
Sent: Friday, December 24, 2021 9:13 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) No Ivory Rezone

Hi Daniel,

I would like to make clear my **opposition** to the revised Ivory Homes rezone proposition! The Avenues neighbors do not want this high density, low quality development. It should be clear to the City by now but it seems Ivory will do everything it can to get its way. Please listen to the people who live here.

We do not want Ivory Homes in our neighborhood!

Thank you and happy holidays!
Margo Becker

--

Margo B. Becker
[REDACTED]

Echeverria, Daniel

From: Patrice Showers Corneli <[REDACTED]>
Sent: Thursday, December 23, 2021 7:25 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Rezone 675 N F Street

What a terrible idea? I must say I am disappointed by all the 'luxury' housing going up including right next to us in the lower Aves and desperately want affordable housing in the Avenues so we stay as diverse as we are. But jam packing people into a place as small as is proposed would ruin the Avenues. I expect that the idea is to make affordable housing as dense as possible at the expense of the character of the Aves, is just another way to squeeze (yes squeeze) people chock a block to maximum to income going to the Ivory homes folks. These homes have always been ordinary run of the mill places. If your goal is affordable living. The place you wish to transform is not convenient to shops and services in walking distance and would, therefore, traffic will be awful.

Patrice Showers Corneli
272 C St,

Echeverria, Daniel

From: Jeff Penrod <[REDACTED]>
Sent: Thursday, December 23, 2021 10:31 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED] Jeff Penrod; debra penrod
Subject: (EXTERNAL) Please reject Avenues rezone from FR-3 to SR-1

Greetings,

We just moved to Salt Lake and purchased our home on Little Valley Rd near 18th Ave. We chose the Avenues and love living in the Avenues because of the unique character, personality, history, and culture. One of the things that makes the Avenues unique is the beautiful architecture and houses here.

We want to keep and preserve the great character and in order to do that, we are 1000% opposed to the proposed rezone of the 3.1 acre parcel at F and 13th from FR-3 to SR-1 as proposed by outside developers. This is a blatant cash grab by the developer doing what developers do - be as greedy as possible and try to maximize cash by changing the rules in their favor.

As residents and homeowners (we own two houses in the Avenues), we are completely opposed to this rezone and ask you with all possible urgency to deny it and not give the proposal serious consideration. Please reject it at your earliest opportunity.

Finally, we support the right to develop the property under current zoning. We just don't want any changes in zoning that will increase density. It would be nice if we could figure out how to preserve this as open space, but I know that would be expensive.

Thanks for your consideration,
Jeff and Debra Penrod
Little Valley Rd

Echeverria, Daniel

From: Marilyn Neilson <[REDACTED]>
Sent: Wednesday, December 22, 2021 5:41 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Fwd: Ivory Home Development

Begin forwarded message:

From: Marilyn Neilson <[REDACTED]>
Subject: Ivory Home Development
Date: December 22, 2021 at 5:40:37 PM MST
To: [REDACTED]

Hello Daniel, I hope you honor your indications that you favor how passionately we oppose this Ivory Home development and rezoning of the Avenues.

There is a beautiful neighborhood on the Avenues and we vehemently oppose the rezoning, just as we do the crammed housing they are going to build destroying the environment = trees, wildlife and our peace and quiet with pollution, traffic and noise.

It is beyond offensive to all residents of the Avenues to witness the greed of this developer. I know Ellis Ivory and I'm appalled at his avarice in cramming these shacks together. We know how he would fight to save his neighborhood as we wish to do as well.

Please know, ALL RESIDENTS on the Avenues are appalled at the idea of the dense structures that would be built if this rezoning were to occur. Marilyn Neilson

Echeverria, Daniel

From: RAY TWITE <[REDACTED]>
Sent: Wednesday, December 22, 2021 12:24 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Application to re-zone 675 North F Street

Dear Sir:

I am writing to record my objection to the request to re-zone 675 North F Street. The density of the proposed development is too much for you to approve. The Avenues community is united in opposition to Ivory's re-zone proposals, starting in 2020, for the same reasons.

Respectfully submitted-
Raymond Twite

755 N Sunrise Ave, Salt Lake City, UT 84103

Echeverria, Daniel

From: Valerie Lambert <[REDACTED]>
Sent: Tuesday, December 21, 2021 10:56 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) proposal to rezone from FR-3 to SR-1.

Dear Mr. Echeverria,

I want to notify you of my strong opposition to the proposed rezoning requested by Ivory Homes to over-develop the area located around 675 N. F Street. I have been a resident of the avenues for over 40 years, and during that time have seen traffic change from what is safe and appropriate for a residential area to an increase in busy, noisy traffic which frequently presents safety hazards.

The proposal, which would over-develop the affected area, will likely open the avenues zoning to more proposals to over-develop this historic area and I fear will decrease the value of the properties around the proposed development.

I adamantly oppose the rezoning and strongly hope that the proposal will be denied. There are other places that Ivory could develop which would not cause the financial and environmental damage that the Avenues area would sustain if the rezoning goes through.

Sincerely,

Valerie Lambert, L.C.S.W., C.T.

Echeverria, Daniel

From: Benjamin A. Steinberg <[REDACTED]>
Sent: Tuesday, December 21, 2021 7:30 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Rezone Opposition

Dear Mr. Echeverria,

I write to express my opposition to the proposed re-zoning of the lot at 675 North F Street, as put forth by Ivory Homes. My opposition is based on the following concerns:

1. The proposed re-zoning is too dense

- a. The density of the proposed development is considerably greater than any of the existing developments in the vicinity.
- b. This overly dense proposal raises concerns regarding water runoff and loss of wildlife habitat.
- c. This site has long been a nesting site for red-tailed hawks. Ivory proposes to remove all of the mature trees.

2. Planned Development allows zone exemptions (PD). Ivory requested a PD in their June 2021 application. A PD was apparently not in the picture for Ivory until they fixed on SR-1 as a target zone and realized that they could not meet the zoning requirements of this zone, particularly in regard to lot sizes and setbacks. A PD provides a mechanism for a developer to request exemptions from a zone's strictures. For example, 6 of 19 of Ivory's lots are less than the required 5,000 square foot minimum for SR-1. Not even one of the 19 lots meet the rear setback requirements. Many other exceptions to the zone stipulations are apparent in the plan.

3. SR-1 zoning does not exist in the Avenues. Ivory is requesting SR-1 zoning. This zone does not exist in the Avenues; much of the Avenues is zoned SR-1A, which is a revision of SR-1 designed to avoid problems that arose with SR-1. While these zoning codes are similar, SR-1 allows taller buildings further adding to the bulk of this development

4. This development will add around 70 cars

- a. Public transport options are limited to the #11 bus that runs once per hour, now only comes as far north as 11th Avenue, ceases operation at 8 PM and does not operate on weekends. To get downtown, one must transfer to the #6 bus, adding to the journey time. This is insufficient to satisfy most families' needs and, by necessity, most 2 adult families will be forced to operate two cars. With 33 dwellings this equates to almost 70 cars
- b. The City's 5-Year Housing Plan clearly states that high density developments need to be in walkable areas of the city close to shops, restaurants, work, public transport, etc. This is not such an urban location.
- c. 70 cars add to the city's air pollution problem and lead to greater congestion on our already crowded Avenues streets.
- d. The corner of F Street is a bus stop for children attending both middle and high schools. Mixing more cars with sleepy kids on dark winter mornings is dangerous.
- e. The slope of F street between Capitol Park Avenue and 11th Avenue is very steep and a known winter traffic hazard.
- f. ***I worry about the safety of my children, with the increased traffic past our home.***

5. Breaks faith. People who purchased homes adjoining this lot expected that FR-3 zoning would continue to be enforced. Changing this zoning so drastically breaks faith with these residents who have chosen to build their lives and pay their taxes in Salt Lake City.

6. Not affordable. With skyrocketing real estate values and an influx of new residents, the city has a housing affordability crisis. Ivory claims that this development helps alleviate that crisis. This is nonsensical. The proposed sale price on the homes with ADUs is estimated by Ivory to be in excess of \$1 million, hardly affordable to most families. The rental costs on the ADUs are likely to be correspondingly unaffordable, especially when one factors in the need for most two adult families to operate two cars.

7. **Capitol Park Avenue is a private road.** Capitol Park Avenue is a private road owned by Capitol Park and The Meridien and was designed and constructed to meet the limited needs of this low-density community. ***For the ten-year period between 2005 and 2015, the Capitol Park and Meridien HOAs petitioned the City to take ownership of and maintenance responsibility for this private street. The City refused on the basis that Capitol Park Avenue was too narrow and did not meet City construction standards.*** Now Ivory Homes asks you to disregard the zoning that has guided the development of this area over the past 35 years and they want you to allow the only access for the interior 28 dwellings to be onto the privately owned Capitol Park Avenue.

Thank you for your consideration and service to the city.

Happy Holidays,

Ben Steinberg
290 E. Penny Parade Dr.

Echeverria, Daniel

From: Jane Mangelson <[REDACTED]>
Sent: Tuesday, December 21, 2021 6:17 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Re: Ivory Homes Development

Dear Mr Echeverria,

I am resending this email to let you know that I am still in opposition to Ivory Homes development on 673 N. F Street. It is my understanding that Ivory is now asking for a zoning that would allow 19 primary homes and 16 ADU's for a total of 33 dwellings. This is still unacceptable given the lot size, the increased traffic on a dead end street, the disruption of wildlife next to undeveloped foothills, and the lack of public transportation and services. There is one grocery store in the Avenues (Smith's), and it is already struggling to accommodate the neighborhood's needs. These are just a few of the reasons I am opposed to Ivory's request for re-zoning.

I am so disturbed that Ivory Homes cares so little for the concerns of the neighborhood, and is still going above and beyond to push their agenda forward with no support from the surrounding community. The idea that they are offering affordable housing is a joke!

I am disappointed by their continued disregard for the interests of the homeowners. I have lived here for over 25 years with my family, and I have witnessed the growth and development of the Capitol Park Community where I live. Ivory Homes should continue with the well thought out neighborhood that was intended for this area. I purchased my home with the belief that the city would honor the current zoning which has responsibly developed the area without overcrowding.

I ask that you consider the strong arguments that our Avenues neighborhood has put forward, and say no to Ivory's request for re-zoning.

Sincerely,

Jane Mangelson

> On Jun 25, 2020, at 9:42 PM, Jane Mangelson <[REDACTED]> wrote:

>

> June 25, 2020

>

> Dear Mr. Echeverria,

>

> I am writing to you with regards to the proposed development by Ivory Homes on 673 N. F Street. I have resided, for nearly 25 years, in the adjacent Capital Park Development and I am Very opposed, along with my family, to the zoning changes that are being discussed.

> As I have heard, the current zoning would accommodate up to 11 homes on this 3.5 acre lot, which I am not opposed to, but with the new zoning, 45 residences would be allowed. This is totally unacceptable to me and my neighbors. As a member of the Capital Park HOA, I have been assessed yearly dues to pay for the maintenance of our private road. This road would need to be used, by the approximately 90 more cars, to access the new development. I am concerned about the effect that this huge increase in traffic would have in an area that has such limited access points, and is in such close proximity to undeveloped foothills. I recognize that there is a need for affordable housing, but it should be in an area that offers mass transportation and other necessary services. This new development would be completely out of

character with the Avenues and would be surrounded by million dollar homes and luxury condominiums. I hope you will take serious consideration of my concerns and the many others who are so unhappy about this new proposition that would wreak havoc on our quiet, well thought out neighborhood.

>

> Sincerely,

>

> Jane Mangelson

> Michael Mangelson M.D.

> 369 East 12th Avenue

Echeverria, Daniel

From: Ed Bedell <[REDACTED]>
Sent: Tuesday, December 21, 2021 4:45 PM
To: Echeverria, Daniel
Cc: Andrew Bebbington; [REDACTED]
Subject: (EXTERNAL) Ivory Homes rezoning application

We have lived at 423 E 12th Avenue. Salt Lake City UT for the past 20 years. We are very much opposed to the Ivory Homes rezoning application. Please honor the current zoning for our area of the Avenues that we have all been held to and do not let the Ivory Homes Corporation bully the change through the Planning department. This change would greatly change our community for the worst.

Thanks

Ed & Leah Bedell

Echeverria, Daniel

From: [REDACTED]
Sent: Tuesday, December 21, 2021 4:18 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory homes & Infrastructure

Daniel:

I have lived in Capitol for the last 19 years and grew up across the canyon in the Ensign Peak area.

I built my house up there on 0.67 acres to enjoy space with my family, a big yard with trees and distance from my neighbors.

My concern with the Ivory Homes development is that the current infrastructure cannot support the additional cars and people.

The streets in CPHOA remain private because they are not wide enough for the city to take them or a fire truck to turn around.

We are also responsible for our own snow removal and sometimes it just doesn't happen.

During this latest snow storm, a truck that was going to work on the Wright Annex Building got stuck on the steep part of Capitol Park in front of my house all day. This is a common occurrence every winter.

My wife and kids couldn't get out and missed school. I can only imagine the additional traffic problems and liabilities that will be created by all the Ivory homes cars cutting through our narrow HOA streets.

Also the lack of sidewalks, additional road use and burden on the utilities underground concerns me. Thanks for taking a look at these issues before we get too far.

Thanks,
Danny Payne

Daniel H. Payne
Managing Director - Investments
The Payne Group of Wells Fargo Advisors

Wells Fargo Advisors | 201 South Main Street, Suite 160 | Salt Lake City, UT 84111
MAC H3857-010
Tel [REDACTED] | Cell [REDACTED] | Fax [REDACTED]

[REDACTED] | <http://www.thepaynegroup.wfadv.com>

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Echeverria, Daniel

From: Koziatek, Gina <[REDACTED]>
Sent: Tuesday, December 21, 2021 3:40 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; Preserve Our Avenues Zoning Coalition
Subject: (EXTERNAL) 675 N F Street Zoning Preservation

Dear Mr. Echeverria,

Please don't allow Ivory Homes to change the zoning at 675 N F Street. I understand the need for high density development, but 675 N F Street is not the place to change the current FR-3 zoning. This area cannot support the additional traffic that will come with more than the current allowed zoning of 11 homes. All exit roads from the development down the hill, will cause all the additional cars to cross the walking route to get to the elementary school. The added traffic is a danger to our young children walking to Ensign Elementary School. A zoning change breaks the faith to all the families who have chosen to move into the area so their children could safely walk to school. This zoning change will also drastically change the character of the Avenues and will potentially set a precedent for future development in the area. Please do the right thing and don't change the zoning from FR-3 regardless of Ivory Homes plan.

Sincerely,
Gina



***Wire Fraud is Real*. Before wiring any money, call the intended recipient at a number you know is valid to confirm the instructions.** Additionally, please note that the sender does not have authority to bind a party to a real estate contract via written or verbal communication.

Echeverria, Daniel

From: Gregory Chachas <[REDACTED]>
Sent: Tuesday, December 21, 2021 3:01 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory

Mr. Echeverria

We certainly do not need Ivory developing all the additional units with the car congestion and the additional cars driving through Capital Park just to mention a couple of items.

I would strongly urge you to look at all of the objections to their development and vote to allow them 11 units under the current zoning.

Thank You

GregChachas
689 Caring Cove, Salt Lake City, UT 84103

--

Regards:

Greg

OPPOSITION TO IVORY HOMES REZONING APPLICATION AT 675 NORTH F STREET

Mr. Daniel Echeverria, Senior Planner
Salt Lake City Planning Division
[REDACTED]

Re: This is the third letter I have written in opposition to the proposed Zoning change at 675 North F Street in Salt Lake City.

Dear Mr. Echeverria,

I am writing this letter to express my continuing strong opposition to the Ivory Homes rezoning application. My neighborhood is adjacent to the property subject to the rezoning application.

Looking at the latest version of the everchanging plans shows that Ivory now plans to scar the hillside with multiple tiered terraces to create room for an excessive number of very large million dollar “starter” homes in their cottage grouping. Their submission shows they plan to do this by building tall retaining walls within a few feet of their neighbor Northpoint Estates’ only road entering and leaving Northpoint property. This is an unwarranted and unnecessary risk to place upon the 49 households in this 40-year-old project.

Northpoint’s road could be compromised immediately or over time by Ivory’s unwise decision. I am sure that everyone is aware that an earthquake fault lies only blocks from the target property. Insurance companies are aware as evidenced by the fact that only a couple insurance companies offer earthquake insurance in this area and rates have doubled in the last year.

Staying within current zoning requirements would dramatically reduce the amount of property disruptions.

This overly dense project, which will provide limited benefit in terms of expanded housing options for Salt Lake City, has numerous other problems and reasons to deny the application.

I have read the purpose statement and general provisions of the proposed rezoning. Walking distance to shopping, dining, employment, and other daily needs are clearly not possible at this property location. Bus service is infrequent, only comes as high as 11th Avenue, and does not include evenings or weekends. It must be remembered that distance is not the only impediment to walking in the upper avenues. The streets are very steep. I would invite anyone to walk from Smith’s on 6th Avenue up to Capital Park Avenue with a bag of groceries; it is a steep, arduous climb.

I have also reviewed Ivory’s 202-page proposal narrative for the property, which appears to be much the same as the one used in the second application. There are many misleading and inaccurate statements, so I will only mention a few.

For example, a professor from the U wrote nine pages supporting Ivory's proposal. His proposal assumes that an individual who pays upwards of \$1,000,000 is a logical and ready source for renting part of their property. He also mentions "aging in place" and transit accessibility, plus proximity to services. The professor must not have visited the property, because if he had he would have quickly realized there is no walkable availability to shopping, groceries, and medical services, etc. nearby.

Similarly, the UCAIR letter in support of Ivory also refers to "Placing housing, transportation and job or educational opportunities closer together results in more walking and biking, more transit use and, as a result, fewer vehicle trips." This leads to cleaner air. This comment must have been plucked from a previous stock file of recommendation letters. As mentioned above this neighborhood is not walkable other than for exercise or recreation.

The proposed rezoning is for totally different property characteristics than 675 North F Street. Ivory appears to be trying to put a square peg in a round hole in order to make more money at the expense of the existing neighborhood. In fact, all of what they say they want could be accomplished under current zoning, which would be eleven units and eleven ADUs. At a Greater Avenues Community Council meeting a representative of Ivory said they could make more profit staying within the current zoning. A strange comment in light of their proposal.

We feel the current zoning, allowing for 11 units plus 11 ADUs more accurately fits the reality and livability of this property's location at 675 North F Street. Zoning regulations have a purpose for the long-term viability of neighborhoods and should not be changed to suit a single entity's desire or profit motivation.

Thank you for your consideration,

Bruce Johnson

849 N Juniperpoint Drive
Salt Lake City, UT 84103

[REDACTED]

Cc:

Mayor Erin Mendenhall
Chris Wharton District 3 City Council

[REDACTED]

December 21, 2021

I am writing on behalf of the residents of Northpoint Estates, which is located north of the lot at 675 F Street. After reviewing the plans registered by Ivory Homes the residents of Northpoint Estates have many concerns.

1. Car congestion is a major concern for us, especially if there is an emergency and an evacuation needs to occur. This is a very real possibility since we are adjacent to City Creek Canyon. Between extreme dry conditions and the homeless population in the canyon wildfires are and have been a threat to us. Presently with the proposed plan there could be 80 or more additional cars sharing one exit route. Northpoint has only one entrance/exit.
2. Ivory's new plan contains many retaining walls. One of those walls goes along the border of Northpoint Estates. Our boarder with Ivory's property also has a retaining wall. Our wall is important to the stability of our one road in and out of Northpoint Estates. If Ivory at all compromises our wall it would affect the stability of our road. Ivory would also have to allow a minimum of three feet between our retaining wall and theirs. That area would easily become an area for garbage to collect leading to rodents.
3. The density of Ivory's development is greater than any of the existing developments in the area. The lot sizes are very small, minimal set backs and very little green space around each home does not blend in with the surrounding neighborhood.
4. Ivory continues to have very little guest parking in their present plan. This would push extra cars onto Capital Park Dr. Capital Park Dr. does not meet the city's regulation for width, thus no parking is allowed.
5. The City's 5-Year Housing Plan states that high density development needs to be in walkable areas of the city close to shops & restaurants. This is not such an urban area. There are no stores or restaurants that are "easily" walkable to from this lot.

6. Throughout the Avenues there has been a strong opposition to Ivory's rezone. In July 2020, 2,100 residents signed a petition opposing Ivory's rezone proposal. In April of 2021 GACC held a second vote concerning Ivory's second revision of their plan. The vote was 1,244 against and 25 for. Their third plan has even more density than their first two plans and the opposition still exists.

Yes, we think the lot should be developed. It needs to be done in a way that enhances the neighborhood and adds to what makes the Avenues special. We feel the current zoning, allowing for 11 units plus 11 ADU's, fits the Avenues' master plan and should be maintained.

Sincerely,

Janice Ruggles

Chair of Northpoint Estates HOA

Echeverria, Daniel

From: Jeff Burton <[REDACTED]>
Sent: Monday, December 20, 2021 8:30 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) F St and 13th Ave Rezone

Hi, Dr. Echeverria,

I am totally opposed to the zoning change proposal at 13th Ave and F Street.

It will result in dangerous conditions due to heavy traffic and trouble for fire engines to reach the areas surrounding the new constructions. F Street is the only road leading to 49 homes located at F St and 14th Avenue.

It will destroy the legacy of the VA hospital and the history of its work. It will make a lot of Ivory people rich at the expense of those who live in the area now.

Please vote no on the proposed changes by Ivory homes.

Thanks.

D. Jeff Burton
791 Northpoint Dr
SLC Utah 84103

675 north F street zoning

Mr. Echeverria,

December 17, 2021

I am Nathan Dean, a pulmonary physician at Intermountain Medical Center and the University of Utah. My group has published research linking Wasatch Front air pollution with increased rate and mortality from pneumonia.

Mayor Mendenhall in her 2021 State of the City address said: **“We can and must take aggressive actions to end the epidemic of emissions in the Salt Lake Valley, not only to improve the quality of the air here, but to try to slow and lessen the impacts of climate change worldwide.”** Salt Lake City’s air pollution increases the rates of lung cancer and heart attacks, and aggravates asthma, COPD, and other lung diseases. In children, air pollution inhibits normal lung development and worsens asthma and viral respiratory infections. Long term air pollution has been associated with increased mortality from COVID-19. During winter inversions and the summer/fall fire season, our levels of particulate pollution (also known as PM-10) can be the highest in the United States.

Packing 20 homes and 15 ADUs into the F street lot will add 70 new cars and trucks, to be driven 100,000 times per year and produce emissions that will worsen air quality in our neighborhood and city. F street is too steep for walking or cycling except for people who are vigorously exercising, not carrying groceries or traveling to work or school. The nearest bus (#6) to downtown stops at LDS Hospital, more than 4 steep blocks from the property and runs every 30 to 60 minutes; a weekday bus (#F11) to the University is 2 steep blocks away. Residents of the property will rely almost exclusively on private cars. Short automobile trips to the closest shops on 6th avenue disproportionately produce emissions.

This proposal does **not** provide affordable housing close to jobs, schools, and services and will **increase** rather than reduce greenhouse gas emissions and fossil fuel consumption. Ivory plans to cut down trees planted on VA hospital grounds from its 1930 opening, trees that currently transform CO2 into oxygen.

To conclude, I strongly oppose rezoning that will considerably worsen air quality in the Avenues and Salt Lake City, and worsen the climate change crisis.



This proposal does **not** provide affordable housing close to jobs, schools, and services and will **increase** rather than reduce greenhouse gas emissions and fossil fuel consumption. Ivory plans to cut down trees planted on VA hospital grounds from its 1930 opening, trees that currently transform CO2 into oxygen.

To conclude, I strongly oppose rezoning that will considerably worsen air quality in the Avenues and Salt Lake City, and worsen the climate change crisis. A WORD version of my email is attached.

Thank you, Nathan Dean

From: Echeverria, Daniel <[REDACTED]>
Sent: Monday, November 29, 2021 4:47 PM
Subject: RE: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

External Sender: Be aware! Read with care!

A small clarification on the below notice e-mail - The lots proposed along F Street (Lots 1 to 5) are proposed to be custom homes and so may or may not ultimately include an accessory dwelling unit. Each single-family home accessed from the internal private street (Lots 6 to 19) is proposed to include an internal accessory dwelling unit when built.

DANIEL ECHEVERRIA
Senior Planner
Planning Division

DEPARTMENT of COMMUNITY and NEIGHBORHOODS
SALT LAKE CITY CORPORATION

TEL [REDACTED]
EMAIL [REDACTED]

www.SLC.GOV/PLANNING
www.OurNeighborhoodsCAN.com

From: Echeverria, Daniel
Sent: Monday, November 29, 2021 3:59 PM
Subject: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

Good afternoon,

You are being provided this update about the 675 N F Street development proposal as you have previously contacted the Salt Lake City Planning Division about the property owner's development proposal.

The property owner, Ivory Development, originally submitted a Zoning Map and Master Plan Amendment to the City in 2020. The applicant requested that the City pause processing those petitions while they refined their proposal and has now submitted a Planned Development and Preliminary Subdivision application to accompany those two original petitions.

The Planned Development and Subdivision applications propose a 19-lot single-family home development for the property, titled "Capitol Park Cottages." Each single-family home is proposed to include an accessory dwelling unit. Two parcels are proposed to be reserved for a private park and a guest parking area within the site. The applicant is still seeking to amend the zoning of the property from the FR-3/12,000 (Foothills Residential) zone to the SR-1 (Special Development Pattern Residential) zone to allow their requested number of lots.

With these two additional applications in, the applicant has requested that the City resume processing the petitions. All four petitions will be processed concurrently.

Details on the applications, including the City review criteria, FR-3 and SR-1 zoning information, the final decision maker on each application type, the applicant's narrative, and the proposed development plans can be accessed from the City's

Open House webpage for the proposal here: <http://bit.ly/slc-openhouse-01175> Please expand the "Additional Information" section for a list of downloadable materials.

There is a 45-day public comment period on the proposal. Following the 45-day comment period the proposal will be scheduled for a public hearing with the Planning Commission. The Greater Avenues Community Council has also been contacted about the proposal and they may choose to have the applicant make a presentation at one of their meetings during this 45-day period. The community council website is here: <http://www.slc-avenues.org/>

If you have any comments you would like to have considered by City Planning Staff and forwarded to the Planning Commission for their consideration, please e-mail those directly to me at [REDACTED] Please also feel free to reach out to me with any questions.

Sincerely,
DANIEL ECHEVERRIA
Senior Planner
Planning Division

DEPARTMENT of COMMUNITY and NEIGHBORHOODS
SALT LAKE CITY CORPORATION

TEL [REDACTED]
EMAIL [REDACTED]

www.SLC.GOV/PLANNING
www.OurNeighborhoodsCAN.com

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Echeverria, Daniel

From: Leila Brown <[REDACTED]>
Sent: Saturday, December 18, 2021 3:51 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) OPPOSITION OF THE REZONING OF 675 NORTH F STREET!!!!

HELLO MR ECHEVERRIA,

I AM ONCE AGAIN WRITING TO STRONGLY OPPOSE THE IVORY HOMES REZONE AND PLANNED DEVELOPMENT REQUESTS FOR THE 675 NORTH F STREET PROPERTY. AS YOU KNOW, THEY ARE NOW REQUESTING/APPLYING FOR APPROVAL FOR 19 PRIMARY RESIDENCES AND 14 ADU'S, A TOTAL OF 33 DWELLINGS ON A PLOT **CURRENTLY ZONED FOR 11 PRIMARY RESIDENCES. THIS REQUEST SIMPLY MUST BE DENIED!** OUR BELOVED NEIGHBORHOOD WOULD SUFFER GREATLY IF IVORY IS ALLOWED TO COME IN AND OVERBUILD ON THAT PLOT. HERE ARE SOME REASONS WHY IT JUST SHOULDN'T AND WON'T WORK FOR THE COMMUNITY WE HAVE LOVINGLY CREATED OVER THE YEARS.

- TOO DENSE
- PD ALLOWS ZONE EXEMPTIONS
- SR-1 ZONING DOES NOT EXIST IN THE AVENUES
- THIS DEVELOPMENT WILL ADD AROUND 70 CARS
- BREAKS FAITH
- NOT AFFORDABLE
- CAPITAL PARK AVENUE IS A PRIVATE ROAD
- STRONG OPPOSITION IN THE AVENUES

MY HOME IS LOCATED ON THE CORNER OF 12TH AVENUE AND F STREET. THE VOLUME OF TRAFFIC THAT CURRENTLY EXISTS ON F STREET WITH CARS ZOOMING UP AND DOWN IS ALREADY SOMETHING WE DEAL WITH. MY FAMILY HOME IS ONE BLOCK FROM THE TOP OF THE STREET AND I AM SAYING THAT IT IS YOUR RESPONSIBILITY TO MAKE SURE IVORY IS NOT ALLOWED TO OVERBUILD. IT WOULD BE CATASTROPHIC TO OUR ENTIRE NEIGHBORHOOD AND WILL TAKE AWAY SO MUCH OF WHAT WE HAVE WORKED SO HARD TO PROTECT.

I HAVE REVIEWED IVORY'S REVISED PROPOSAL AND VEHEMENTLY OPPOSE THE REZONING OF 675 NORTH F STREET FROM FR-3 TO SR-1.

SINCERELY,
LEILA BROWN
433 E 12TH AVENUE

Echeverria, Daniel

From: Linda Dean <[REDACTED]>
Sent: Saturday, December 18, 2021 4:24 PM
To: Echeverria, Daniel
Cc: Chris Wharton; Jan McKinnon
Subject: (EXTERNAL) Ivory Development on 675 North F Street

Mr. Echeverria

I am writing with regards to the proposed Ivory Homes development on 675 North F Street. My neighbors and I have discussed Ivory's rezoning petition at length. While we are not opposed to the development of the property, we strongly oppose rezoning.

SR-1 does not exist in the Avenues. Ivory is proposing a design which would include large retaining walls running both north/south and east/west which is totally out of keeping with the way the Avenues has been developed. These unsightly retaining walls will scar this beautiful foothills property.

The Avenues residents are opposed to rezoning as demonstrated by 2100 signed petitions, first GACC vote 688 to 4, second GACC vote 1244 to 25, hundreds of signs on neighboring properties reading "NO Ivory Rezone", and hundreds of letters to the Chris Wharton opposing the rezone. Will the voices of those most impacted be heard? I certainly hope so!

I live at the Meridien, a building complex that is listed on the National Register of historic places in Utah. After being empty for 16 years the Meridien and the Annex were granted a special exception to preserve the two neoclassical buildings. The historic VA Hospital buildings had become derelict, and the neighbors WELCOMED the conversion into condos. It is likely if Ivory had purchased these buildings they would have been torn down and the property packed with "cottages".

Will this new development present residents with affordable housing? Ivory Homes has informed us that the selling price for these homes starts at ONE MILLION dollars depending on the model. That's not affordable housing and or for rental of the ADU's. Furthermore, the price point along with no yards (10 ft between houses) or sidewalks will deter families with children and not attract more federal tax dollars to the Avenues schools.

Again, we are not against development of the property but are opposed to this radical rezoning proposal on property that historically was the VA Hospital grounds. Thanks for allowing me to express the thoughts and concerns of so many of our neighbors.

Linda Dean
400 East Capitol Park Avenue Unit 303
Salt Lake City, Utah 84013
cell: [REDACTED]

Echeverria, Daniel

From: joan clissold <[REDACTED]>
Sent: Saturday, December 18, 2021 10:48 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory re-zone

I am still against the proposal as I stated in my last letter. The revised proposal is not in keeping with the avenues historic designation.

Joan Clissold

Sent from my iPhone

Echeverria, Daniel

From: Jeff Polychronis <[REDACTED]>
Sent: Friday, December 17, 2021 5:10 PM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) Ivory Homes F Street Projecct

Dear Mr. Echeverria,

My wife Susie and I live at The Meridien Condominiums on 400 East Capitol Park Avenue. The only exception to FR-3 zoning in the immediate vicinity is The Meridien and the adjacent Wright Building. These buildings housed the original VA Hospital from 1932 to 1961. Primary Children's then utilized the buildings until 1990. Construction on The Meridien began in 2006. These beautiful neoclassic buildings are listed on The National Register of Historic Places and were granted a zoning exception in order to preserve them, as they are important in Salt Lake City's rich history. This exception was not given for new construction. Rather, it was granted to preserve historic structures that predate almost everything in the upper Avenues. There is absolutely no equivalence with Ivory's new construction. And in stark contrast to Ivory's project, this development was widely welcomed by the neighborhood. The Meridien and Wright Building properties were rezoned RMF-35, but the density was tightly restricted by a Development Agreement that limited The Meridien to 29 units and the Wright Building to 7. Today the actual number of units is 27 at The Meridien and 4 at the Wright Building, far less than the 57 Ivory has represented. It should also be noted how these buildings get their density. The Meridien has five stories and the Wright building three, allowing for generous setbacks and extensive landscaping. The Meridien has underground parking for residents and screened surface parking for guests. The Wright building has attached garages designed to fit with its architecture. The City's decision to allow conversion of these buildings into condominiums resulted in beautiful and expansive landscaping, preservation of historic buildings and added critical housing for the city in a responsible manner. Again, there is no equivalence with Ivory's overly dense proposed development with minimal setbacks, minimal green space and inadequate parking.

Thank you.

Jeff Polychronis

Alan B. Hayes
793 Northpoint Court
Salt Lake City, UT 84103
December 17, 2021

Dear Mr. Echeverria,

I am responding to Ivory Homes' application to rezone 675 North F Street. This is the third application submitted by Ivory and it adds a planned development to the expanding list of exceptions to the current status of this lot requested of the city:

1. Rezone from FR-3 to SR-1.
2. Utilization of discredited SR-1 zone that was deliberately eliminated from The Avenues when it was replaced with SR-1A, which reduces the bulk and size of buildings.
3. Change in the Avenues Community Master Plan to allow a denser development than permitted.
4. Construction of Accessory Dwelling Units (ADUs) connected to every one of the 14 cottages in their enclave, doubling the number of households. The five custom homes on F Street could also have ADUs. The unintended consequences of such a cluster of ADUs is as yet unknown.
5. Request for a Planned Development (PD). A PD effectively allows Ivory to circumvent many of the rules for SR-1, such as lot sizes and setbacks, so that they can squeeze their development onto the plot. For example, not one of the lots has the required rear setback for SR-1. Six of the 14 cottage lots are less than the required 5000 square feet. But if the PD is approved, all of this is allowed.

The accumulated effect of all these asks is a marked increase in the number of dwellings in this land parcel and a cluster of homes that is very much out of character with the surrounding neighborhood.

The win for the city is a greater variety of housing stock, but nothing here will be close to affordable unless there is a very generous million-dollar home purchaser who rents an ADU at well below market rates. The question: Does this small gain in housing variety and homes trump a development that is so out of character with this Avenues neighborhood? I think not. This development benefits the developer much more than it benefits the city and the neighborhood.

I ask that the city deny this over-reaching request that puts more money in Ivory's pocket at the expense of greatly impacting the neighborhood but provides only a modest and questionable benefit to the city.

Sincerely,

Alan B. Hayes

Echeverria, Daniel

From: Scott <[REDACTED]>
Sent: Thursday, December 16, 2021 4:33 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Petition Number: PLNPCM2020-00334/00335, PLNPCM2021-00656, PLNSUB2021-01175

Dear Daniel,

I am writing in opposition to the proposed rezoning being requested by these petitions including a change in the **Zoning District:** FR-3/12,000 (Current), SR-1 (Proposed). The current Avenues Master Plan would allow this property to be developed into 11 single-family homes and this development should conform to this Master Plan.

Based on the absence of public transportation and the practical inability to walk from this location to public services (including retail) I do not support the increase in density of the development being requested by the applicant.

The inclusion (or not) of ADU's should have no bearing on this application as the City has determined that (for all intents and purposes) any residential property owner can apply for an ADU. This should be left up to the individual property owner post development.

If, however, the Planning Commission prefers to consider ADU's as part of this application then I believe there is even greater reason to decline the requested density.

The applicant includes a description of the proposed SR-1 Zone. In the description of this zone is the following statement: "Uses are intended to be compatible with the existing scale and intensity of the neighborhood." Unfortunately the proposed development of 19 single family homes is Not compatible with the existing scale and intensity of the neighborhood.

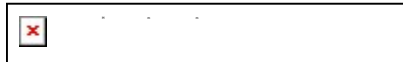
Please pass these comments on to the Planning Commission and the City Council as each considers the requested changes.

Respectfully,

Scott Rosenbush
1027 N Terrace Hills Dr., SLC, UT 84103
[REDACTED]

--

H. Scott Rosenbush



Echeverria, Daniel

From: BRIAN RUGGLES <[REDACTED]>
Sent: Thursday, December 16, 2021 10:42 AM
To: Echeverria, Daniel; [REDACTED] Wharton, Chris
Subject: (EXTERNAL) Ivory Development in Avenues

Dec. 16, 2021

My name is Janice Ruggles. I am the chair of the management committee at Northpoint Estates, which is located adjacent to Ivory's property on the north side. We have 49 units on 13 acres of property. I would like to share with you two of my concerns concerning the Ivory development off "F" Street in the Avenues.

My first one is snow removal. At Northpoint we have 33 off street guest parking slots located throughout our community. The homeowners would say that we are lacking in guest parking. In the winter we lose about a third of those spaces to snow removal. We need those parking areas to pile snow in. Ivory's Enclave offers limited parking for guests other than the driveways. That leaves few options on where you can pile the snow that comes from the driveways and roads. Capital Park Drive is a private road and the Enclave cannot push their snow onto that road. In reference to plowing we have been fortunate to have had some low snow years. A community cannot count on that. One year we had so much snow Northpoint had to hire a dump truck to haul out already piled snow.

My second concern is garbage and recycling. It appears this will be a problem for the residents of the Enclave. There is minimal frontage space that is not taken up by a driveway. Each lot will have two households putting out garbage cans and recycling. Cans are to be spaced three feet apart. Plus there is on street parking that limits where the cans may be placed. Throw in an emergency when a fire truck needs to come into the Enclave and there is no room for maneuvering. This could be a disaster waiting to happen.

Overall they are planning too dense a community in a space that has lots of limitations and puts the community at risk. Please consider these basic concerns when reviewing Ivory's request for a zoning change.

Thank you, Janice Ruggles

Echeverria, Daniel

From: Jeff Burton <[REDACTED]>
Sent: Thursday, December 16, 2021 10:22 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Zoning near VA hospital on the Aveneue

To All it May Concern

Re: Ivory Homes proposed change to zoning on 13th Avenue and F Street

I am totally opposed to their latest proposal.

It will cause a lot of traffic congestion on F Street, parking will be horrible, fire engines will have trouble getting to homes in the surrounding areas, the historical legacy of the VA hospital and its surroundings will be ruined, it will create a new and dangerous fire hazard, there will be a lot noise, and so forth.

Please don't change the zoning for this area.

Thanks.

D. Jeff Burton

791 Northpoint Drive SLC

Echeverria, Daniel

From: Kevin Hamilton <[REDACTED]>
Sent: Wednesday, December 15, 2021 1:46 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) No Ivory Homes Re-Zone

Dear Daniel,

We strongly oppose the request by Ivory Homes to re-Zone the property on Capitol Park Avenue for the following reasons:

1. The re-zone request is too dense. It is my understanding that Ivory is seeking a rezone from the current FR-3 zoning which has a minimum lot size of 12,000 square feet to SR-1 which has a minimum lot size of 5000 square feet. This level of density is inappropriate for this foothills location that lacks the infrastructure to support it and is considerably greater than any of the existing developments in the vicinity.
2. SR-1 zoning does not exist in the Avenues.
3. This development will add many more cars. Estimates of as many as 70 additional vehicles have been made.
4. Capitol Park Avenue is a private road owned by Capitol Park and The Meridien and was designed and constructed to meet the limited needs of this low-density community.
5. The Upper Avenues community is united in their opposition to Ivory's rezone proposal, with quite literally thousands of residents registering their opposition.

Please note our opposition. Please encourage our City Council to vote no.

Sincerely,

Kevin and Claudia Hamilton

[REDACTED]
590 North Capitol Park Avenue, SLC UT 84103

Echeverria, Daniel

From: Kelly <[REDACTED]>
Sent: Wednesday, December 15, 2021 9:05 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Capitol

Mr Echeverria,

Thanks in advance for your time. I am writing for the third time regarding the 'Capitol Cottages'. Again, I am opposed to this development. I don't appreciate the developers opening the comment period to be over the holidays. And I don't think it is a coincidence.

Several aspects of this request jump out. The space is zoned for 11 structures and as you know Ivory Homes is asking for 33. Plenty of money can be made in building 11 homes. Nobody buying a home at that price point is going to actually build and rent out an ADU in their backyard. So that is a moot point. The plan as they have submitted is too dense. SR-1 zone doesn't currently even exist in the Avenues. Why should we change it for these developers to come in and make a killing? We don't need anymore traffic in the Avenues. These people are not going to use public transportation. There are many more reasons to deny this request. I'm sure I have touched on them in the past. This new request has not really even changed from the other two. Why do we allow the developers to keep submitting a request for a zone change while the neighborhood residents have consistently shown incredible opposition to the plan?

Thanks again!
Kelly Stevens
Avenues resident

Echeverria, Daniel

From: Matthew Peterson <[REDACTED]>
Sent: Wednesday, December 15, 2021 8:32 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Oppose Ivory Homes Capitol Cottages Rezone

I am writing to express my opposition to the proposed rezoning and development of Ivory Homes' Capitol Cottages project.

As a 20 year resident and homeowner in the Avenues, I feel the density of the proposed development is out of character with the existing neighborhood and will have a considerable negative impact on our quality of life.

Thank you for your consideration,

--

Matthew Peterson
635 J Street
SLC UT 84103
[REDACTED]

Echeverria, Daniel

From: Victoria Pineiro <[REDACTED]>
Sent: Wednesday, December 15, 2021 8:06 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Avenues Zoning

To Daniel,

I am writing to ask you to deny Ivory homes their request to rezone the parcel in the avenues from FR-3 to SR-1. The community clearly does not want this development for a number of reasons.

I personally am opposed because it is an obvious cash grab that harms the neighborhood and the residents. These houses will not be affordable, will be a nightmare for traffic conditions and put a lot of pressure on our neighborhood infrastructure.

Please deny this request. We need AFFORDABLE housing. Not unaffordable homes that will enrich a wealthy corporation and harm current residents. We want affordable, family homes that meet the master plan. Please do not make an exception for Ivory homes, they have made it clear they are not operating in good faith or with current residents in mind.

Yours sincerely,

Victoria
(A current Avenues home owner)

Echeverria, Daniel

From: Tracy Lewis <[REDACTED]>
Sent: Wednesday, December 15, 2021 6:46 AM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Home Proposal

To Whom It May Concern:

I have reviewed Ivory's revised proposal and remain opposed to the rezoning of 675 North F Street. Ivory's proposal is not affordable, and the city already has a housing emergency. We need more affordable housing not a new development that is not affordable for the people that need it most. I also feel that this new development would bring additional cars and congestion to our residential area.

I don't understand why the city continues to allow Ivory to "revise" proposals. This was decided upon, and the Avenue's residents opposed the original plan drafted by Ivory.

Sincerely,

Tracy L. Lewis
367 K Street
Salt Lake City, Utah 84103
[REDACTED]

Echeverria, Daniel

From: Sarah Scott <[REDACTED]>
Sent: Tuesday, December 14, 2021 9:19 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Capitol Park rezone from FR-3 to SR-1.

Dear Mr. Echeverria –

This letter is to voice my concern about the proposed rezone by Ivory Homes in Capitol Park. Under current FR-3 zoning the maximum number of primary residences is 11, and Ivory wants 19 in its latest application. Combined with the rezone to gain more lots, Ivory seeks to add an ADU to at least 14 of the lots for a total of 33 dwellings, or a 300% increase over the original plan. What is most frustrating is that after all of the public outcry, Ivory hasn't budged on this request.

The density of the proposed development affects everyone in the Avenues area – particularly the neighborhood near foothills locations like City Creek Canyon where water runoff and loss of wildlife habitat are already issues. The lot in question has always – for the 16 years I've lived in the neighborhood – been a nesting place for hawks. Ivory proposes to remove all of the mature trees in the neighborhood and destroy this sanctuary and point of visual interest for local denizens. For these reasons, as well as the proposed minimums for setbacks and greenspace, the overly dense proposal is considered by most neighbors to be not in keeping with the aesthetics of the area.

Please vote *against* this zoning application, and stand behind local residents who have invested in and stewarded our downtown foothill neighborhoods up until now.

Thank you for hearing our plea.

Sarah Scott

489 12th Avenue

Salt Lake City, UT 84103

My name is Jan McKinnon. My husband and I reside at 400 Capitol Park and I am the President of the Meridien HOA and one of the founders of POAZC.

Mr. Echevarria, You have received over 200 (maybe closer to 300) detailed written submissions from residents of the Greater Avenues explaining their opposition to the rezoning. The GACC reported historic, widespread opposition to the proposed rezone. And you know that over 2100 Avenues residents signed a petition opposing the rezone. What hasn't been shown is any serious justification from Ivory Homes why they should be granted this rezone. They are asking the city for too much---- a rezone and a Planned Development and a revision of the Avenues Master Plan. Ivory wants a planned development to skirt the height requirements of SR-1. In the Planned Development description it states, "A planned development will result in a more enhanced product than would be achievable through strict application of land use regulations, while enabling the development to be compatible with adjacent and nearby land developments." In no way does this proposal enhance the neighborhood or is it compatible with adjacent and nearby land developments. This project doesn't belong here.

Ivory Homes has presented a novel and ADU rich development plan suggesting that it will help solve the housing crisis facing Salt Lake by creating more "affordable housing." This plan, in this location does not do that. Ivory isn't creating affordable housing and in their own words, these houses will cost at least a million dollars.

I am not opposed to the ADU's but I am opposed to the rezone. Ivory can build the proof of concept for the ADU village without a rezone. The FR3 zone allows them to build 11-12 homes with ADU's. But they are not content with this; they are seeking additional lots through a rezone and then seek to add ADU's to these newly created lots----this is a double whammy---that leads to too great an increase in density for this suburban foothills location. The proposed retaining walls that will surround the proposed development and that lie within the development will create a scar on this lot that will be seen from the valley floor.

This location lacks the infrastructure to support the proposed increase in density. The city and the mayor in one of her State of the City addresses all recognize the need for high density developments in walkable parts of the city, close to jobs, amenities and mass transit. This is not such a location. This lot is at the top of the avenues, next to a wildlife area. There is not adequate public transportation from this neighborhood to downtown or even to the University area. Each residence will probably have two cars significantly increasing the traffic on a very steep street. Children wait for the school

bus on F street and walk to school on streets without sidewalks. Adding more cars is dangerous to their safety.

Most importantly, there is the risk of collateral damage to consider. Will the aggressive overreach of this proposal, if approved, damage the trust that residents have placed in our local government? Will the crisis of the moment blind the city to the need for well-considered residential development decisions that are respectful of neighborhood context and its own previous zoning guidance decisions? There is a reason a master plan was created for the Avenues. Creating too much density in the Upper Avenues, creates problems for the people living in the Lower Avenues. The zoning in the Upper Avenues was designed specifically to protect the fragile foothills and the wildlife area that surrounds it. The residents who have bought homes in this neighborhood put their trust in the city; they trusted that the city would protect the lands that surround their homes. Ivory Homes has not shown any good reasons why they need a rezone to develop this lot.

We respectfully ask the members of the Planning Commission to recommend against this application. Please don't allow Ivory Homes to put a scar on our hillside.

Mr. Daniel Echeverria

I am David Young my home is located on the southwest corner of 12th Avenue and F Street. I have lived on this corner for 24years. I am very concerned about the proposed rezone of the avenues. We have worked very hard to maintain our properties in this section of the Avenues. We have paid our property taxes in good faith to Salt Lake City.

I simply cannot understand the city council and the mayor would even consider a rezone of this historic area. F Street in my opinion is the busiest lettered street above 11th Avenue. We funnel traffic to North Pointe Estates, Capital Park and the Meridian and soon the Historic Wright Building. F Street is very steep and narrow in front of home. I have had a total of four vehicles through the years end up on my property during snowstorms events including one just last Friday. A neighbor and myself surveyed the traffic on Monday September 27th from 11:00am to 2:30pm . We collectively counted 188 cars that crossed 12th Avenue going north and south on F Street. The traffic and the steep grade on F in my opinion cannot support any more vehicles.

In conclusion we have voted inn two separate surveys for or against this rezone and the conclusion was overwhelming NO to this rezone! The people have spoken and its overwhelming No to this rezone.

Thanks for taking time to read this email and thanks for all you do.

David Young
585 F Street
Salt Lake City Ut.
84103

Echeverria, Daniel

From: lisa ord <[REDACTED]>
Sent: Tuesday, December 14, 2021 4:35 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) DO NOT re-zone for IVORY!!

Dear Mr. Echeverria,

As a resident of the Avenues, I am appalled that Ivory Homes is trying to get a rezone so that they can stuff 33 dwellings (dwellings with accessory dwellings) in a space that should only allow a maximum of 11. This is not in keeping with the aesthetics of the Avenues, we do not have the infrastructure to support that kind of expansion. It destroys the natural green space which is a nesting site for red-tailed hawks.

PLEASE do not let Ivory bully you into a rezone. We do not want their ticky-tacky stacked dwellings on our foothills!

Lisa Ord, PhD, LCSW
740 2nd Ave.
SLC, UT 84103

Echeverria, Daniel

From: Ed Zipser <[REDACTED]>
Sent: Tuesday, December 14, 2021 3:49 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED] Hayes, Alan
Subject: (EXTERNAL) Ivory Homes Proposed Rezone, 675 N F St.
Attachments: EZ-Echeverria_NO F ST. REZONE.pdf

Dear Mr. Echeverria,

Please enter the attached letter into the record regarding this proposed rezone, which the vast majority of our neighbors and I agree is STILL a very bad idea. We believe that the latest proposed re-zone is little changed from the two previous proposals. Furthermore, we resent the timing of this new proposal, such that the 45-day period for comment straddles the holidays.

Sincerely,
Ed Zipser

Edward J. Zipser, Professor, Dept. of Atmospheric Sciences, Univ. of Utah
Cell: (801) [REDACTED] E-mail: [REDACTED]

822 N. Grandridge Dr.
Salt Lake City, UT 84103-3343
December 14, 2021

RE: Proposed re-zoning of 675 N. F St. from FR-3 to SR-1

Dear Mr. Echeverria,

I am an 84-year-old resident of Northpoint Estates, adjacent to the land proposed for rezoning, and while I have written to you last June, and again this past February when this re-zoning was proposed and then slightly modified, I would like to reiterate my opposition, and state my reasons that the most recently modified plan proposed by Ivory Homes is still unacceptable.

I have lived here for 23 years, since I accepted a Department Chair position at the University of Utah. and my late wife and I *love* this neighborhood. I still work at the University of Utah, and until the COVID-19 closure, I enjoyed walking to the #11 bus to take me to and from the U of Utah daily. I still enjoy neighborhood walks daily, not least because of the abundant bird life including our resident red-tailed hawks.

We were *always* aware that this property could have up to 11 homes built on it, plus auxiliary units, and we accept that, but we must strongly oppose the proposed plan, because even as modified, it would surely have a major negative impact on the quality of life, not to mention safety, of those of us who live here. Walking and driving on F St would surely become more difficult and probably more hazardous, especially in winter. And the most recently modified plan has such severely restricted road access that it is hard to imagine how fire trucks or other emergency vehicles could get where needed.

Let me hasten to add that many neighbors and I applaud the efforts of the City Council to provide more affordable housing in our city, especially to minorities and other disadvantaged groups. We have always supported these efforts and we are proud that Salt Lake City is a leader in so doing. Higher density has its place, but this location is not one of them. Now that the #11 bus no longer ascends to 13th Avenue, public transportation is lacking, and there are many people, myself included, who simply cannot manage the walk down and up the steep hill, for example to the nearest grocery or drug store.

The recent modification of the design for the property by Ivory Homes is very little changed from the initial plan floated last year. The impact on F St. is just as severe as the original plan, and it is my understanding that once the zoning change is approved, Ivory could not be required to build to the new plan; rather, they would be free to increase density still further.

The most predictable impact of this major increase in population in this limited space will be a major increase in traffic on a very steep street, hazardous in winter, and marked departure from expectations based on existing zoning. It is certain to have a negative impact on tree cover and bird life. My neighbors and I urge rejection of the proposed rezoning.

Sincerely,
Edward J. Zipser

Echeverria, Daniel

From: Nancy L. Cantor <[REDACTED]>
Sent: Tuesday, December 14, 2021 3:42 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Homes Rezone

Dear Mr. Echeverria,

I am writing to register my vehement opposition to the latest Ivory Homes rezone proposal for the property near 13th Avenue and F St. From what I understand, their proposed rezoning would allow them to triple the number of dwellings on the property as compared to what current zoning allows. These would include luxury homes and high end ADU's. It would seriously overcrowd the property and the neighborhood without helping to address the shortage of low cost housing in Salt Lake City. The current proposal is not substantially changed from their previous proposal. I also believe their presenting this proposal at this particular time of the year when people are quite distracted by the holidays seems an attempt to limit the amount of public discourse.

Regards,
Nancy L Cantor
525 E 13th Avenue
[REDACTED]

Echeverria, Daniel

From: Alonzo Huntsman <[REDACTED]>
Sent: Tuesday, December 14, 2021 3:18 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes

Dear Mr. Echeverria

I am an Avenues resident who is concerned about the new development proposed 675 N. F Street. While I would of course like to see the beautiful lot stay open space I realize that this is perhaps not realistic. My primary concern is not the density of the building, rather it is one of aesthetics.

Ivory Homes is a known rapacious developer that couldn't give a damn about anything but making money. To do so they build cheap houses with cookie cutter architectural design. Having a mass of cheaply produced, cheap looking, unimaginative, nearly identical houses in our beautiful neighborhood is an architectural insult and an aesthetic defilement of our unique area.

The avenues is full of creativity and imagination. Houses here come in a broad range of historical designs. I simply can't imagine that Ivory has the desire, taste or room in their business model to build anything that would compliment and enhance what we have in our area. Tasteful homes are not the most inexpensive to build. Individual design costs the builder more. I simply don't trust Ivory to do the right thing as they are relentlessly driven by profit and aesthetics takes time and money.

Please deny the zoning change that are asking for. The residents of this area don't want plastic looking homes stinking up what we otherwise try so hard to beautify. Please don't let them desecrate our cherished neighborhood.

Thank you,

Alonzo Huntsman, PhD
551 E. 11th Avenue
SLC UT 84103

Echeverria, Daniel

From: Courtney Henley <[REDACTED]>
Sent: Tuesday, December 14, 2021 2:03 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) 675 N F Street development proposal

Dear Mr. Echeverria,

I am strongly opposed from the depths of my body and spirit to the application to amend the zoning of the property at 675 N F Street from the FR-3/12,000 (Foothills Residential) zone to the SR-1 (Special Development Pattern Residential) zone to allow three times the number of lots to be developed.

The proposal by for profit Ivory Homes out of southern Salt Lake County is an insult to our local community in Salt Lake City. Ivory Development currently has no stake in the future prosperity of the local community and seeks to maximize profit by negating decades old community master plans. It is beyond the pale. For more than 40 years the Avenues community has been committed to honoring and preserving it's medium density urban/rural character. For 20 years my family has dedicated our lives and livelihood to cultivation of low density nature loving development on our property at 13th Ave and J Street. It would be a betrayal for city planners to throw away all of my family's and neighbors' hard work for an out of towners to come make a buck.

Every aspect of the 1979 Avenues Community Master Plan would be violated by the applicant's proposed development: it is incompatible with the historic district nature of the community, it includes multiple-family dwelling which are not desirable, it will cause dramatic increases in traffic congestion where there is none, it will destroy the ultimate parks and recreation spirit of the rural/urban Avenues by developing precious avian nesting habitat, it would violate the proposals for streetscape improvements that are less concrete and steel and more trees and open space.

For 40 years the community has supported the City Acquisition of Foothill Properties via agreements with Salt Lake County, the State of Utah, and appropriate agencies of the Federal Government to ensure that public properties in the foothills are not sold to private interests without giving the city and opportunity to purchase the property. This is a precedent that should apply to a deep pocketed community organization like the Church of Jesus Christ of Latter Day Saints that is tax exempt and as beholden to the welfare and spiritual nourishment of citizens as a county, state, or federal agency. When the church sold the property to a private interest it violated a sacred trust with the community. This sacred trust can be restored if the previous and current landowners give the community opportunity to purchase the land for preservation.

There is a compelling argument to be made that Salt Lake City needs more housing for a growing population. But the city needs housing for low to middle income citizens and the homeless. The proposed high density upscale development will do nothing to solve the city's housing crisis and will devalue the experience of suburban/rural living that thousands of Avenues inhabitants have dedicated hundreds of thousands of years nurturing. If the city becomes so desperate that 675 N F Street is needed for low income housing or homeless shelter, the Avenues community is full of the most compassionate, accepting, loving members and we will no doubt rise to the occasion to help our fellow men, women, and children.

It is particularly below the belt and manipulative for Christopher Gamvroulas and Ivory Development to submit this application for review and approval over the Christmas and New Years holidays. It is no new trick to the members of the community and city council that private interests push through wildly unpopular proposals that require public review and government action over the winter holidays. Private for profit developers hope that the vested public interest is distracted by family and self care and community service while they pull the rug out from under the citizens and dip their hands in the citizen's purse.

The Avenues community wants two numbers from Ivory Development before any consideration is given to any kind of building permit on the avian refuge and wild land that is 675 N F Street. How much did Ivory pay the Church for the property and how much would the community have to pay to buy it?

Thank you for your service,

Courtney Henley, MD
635 J Street
Salt Lake City, UT



Leo and Cynthia Sotiriou
320 Capitol Park Avenue
Salt Lake City, Utah 84103

December 13, 2021

We oppose Ivory Homes attempt to re-zone from FR-3 to SR-1 in the Capitol Park neighborhood. Ivory is trying to change this plot zoned for 11 single family homes to 20 primary and 15 ADU's. This is an increase of 300%! This development would add approximately 70 cars traveling in the area and would add pollution which would lead to greater congestion and danger.

F Street is very narrow and has one lane in either direction. F Street also has a bus stop for children attending both middle and high school. The road is especially narrow and snowy in the wintertime making traveling more dangerous and congested. A vote was taken at the GACC which resulted in 644 votes against re-zoning and 4 in favor of re-zoning. SR-1 does not exist in the avenues.

We have no problems with the development being zoned FR-3 and developed. Ivory Homes claims that the city has a housing affordability crisis and this development would help this crisis. This is non-sense. The proposed sale price of these homes, with ADU's, is estimated at an excess of \$1,000,000.00. The expensive ADU's would pose a problem. This would double the number of cars using the narrow roads and would not help with the affordable housing crisis!

Capitol Park Avenue is a private road owned by Capitol Park and the Meridian. It was designed and constructed to meet the limited needs of this low density community. The city has refused ownership of the road because it is too narrow. Now Ivory Homes asks to disregard the current zoning and allow access for the intended 28 dwellings onto property owned by Capitol Park. There are also other problems with allowing Ivory Homes to change the zoning which will be brought up at the Planning Commission and City Counsel Meetings.

We hope this is helpful in making your decision in favor of the avenues, Capitol Park, and Meridian residents.

Sincerely,

A handwritten signature in black ink, appearing to read "Leo and Cynthia Sotiriou", with a stylized "MD" at the end.

Leo and Cynthia Sotiriou

Echeverria, Daniel

From: Andrew Bebbington <[REDACTED]>
Sent: Tuesday, December 14, 2021 10:07 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Rezoning Plan

Dear Daniel

I am a resident of Penny Parade Drive in Capitol Park.

I have previously written to the City expressing my opposition to the rezoning application of Ivory. Since this new rezoning proposal barely modifies prior zoning applications, I fee no reason to reiterate all the talking points as to why this application should be rejected.

52 homes were build in Capitol Park relying on the Avenues master plan. The Ivory p[lot should have 11 custom homes built on the plot. The use of ADUs to drive profits and turn the area into an AirBnb hotbed is ridiculous and totally out of character of the Avenues.

I hope the planning permission will reject this proposal and not allow this ploy of continued resubmissions to wear down the opposition.

Thank you

Sent from [Mail](#) for Windows

Echeverria, Daniel

From: Ed <[REDACTED]>
Sent: Tuesday, December 14, 2021 9:49 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) we are opposed to the rezoning of 675 North F Street sought by Ivory Homes

Dear Mr. Echeverria and Councilman Wharton,

As before (we have previously expressed our opinions on this topic) after reviewing Ivory Homes' application for rezoning at 675 North F. Street, we remain steadfast in our opposition to it. While we applaud increased availability of affordable housing, we believe it should be properly integrated into its surroundings, taking into account the interests of the community into which it is proposed and not diametrically different from the neighborhood.

The revised Ivory Homes application would still greatly increase the density of housing, add an unreasonable amount of traffic into small, previously quiet residential streets, increase street parking beyond capacity, and in general run counter to many of the characteristics that make the Avenues a desirable and comfortable place to live. We believe Ivory Homes could create a plan that would allow development of affordable housing that integrates well into the area at issue; this isn't it, though.

We urge rejection of Ivory Homes' rezoning application. Thank you.

Edward and Cindy Havas

Echeverria, Daniel

From: james brown <[REDACTED]>
Sent: Tuesday, December 14, 2021 7:50 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes

Hi Dan

How many times do we need to oppose Ivory homes in the avenues? The overwhelming consensus is NO. Please tell him to build on Walker Lane. It's his neighborhood. I'm sure he'll be fine with that suggestion.

Jim Brown

Kristianna Circle 84103
[REDACTED]

Echeverria, Daniel

From: Andrea Globokar <[REDACTED]>
Sent: Monday, December 13, 2021 5:01 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory Home Re-Zoning

As a resident of the Avenues, I am unequivocally opposed to rezoning open space from 11 to 33 dwellings. The Avenues has a large architectural history. We do not want cookie cutter dwellings, crowded together that are built by Ivory Homes shoddy construction. There is already too much traffic and not enough parking in the Avenues. Please deny this rezoning effort

Andrea Globokar
863 2nd Avenue, 84103

Sent from my iPhone

Echeverria, Daniel

From: Amy L <[REDACTED]>
Sent: Monday, December 13, 2021 3:42 PM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) New Ivory Rezone and Planned Development Application for 675 N. F Street

We are OPPOSED to the rezone from FR-3 to SR-1 for 675 N F Street in the Avenues of Salt Lake. We own two homes in the Avenues and are very concerned about the strain these additional homes will add to the Avenues. We are very much against these changes.

The current proposal creates changes that are very different from the surrounding neighborhood as far as density and green space and setbacks which will not blend into the existing neighborhood.

This will also add additional traffic to the neighborhood which will increase noise and traffic in the area which is already busy and loud. It will also affect the safety of pedestrians and other drivers in the area.

Please do not allow this to go forward.

Thank you,
Amy Lambert
437 J Street

If you are not the intended recipient of this email please call Amy at [REDACTED] and delete this message and any attachments immediately. Thank you.

Echeverria, Daniel

From: Sarah Van Voorhis <[REDACTED]>
Sent: Monday, December 13, 2021 11:29 AM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) I oppose Ivory Homes ReZone request

Dear Mr. Echeverria (copying Mr. Wharton):

I strongly oppose the Ivory Homes request to rezone the open space area at the top of F street from FR-3 to SR-1.

I understand that their argument is the need for more housing, but this will not provide affordable housing to anyone--it will provide the wealthy with inlaw units for their friends and family. No person buying a million-dollar plus home there will be renting out their ADU for an affordable rent.

In the meantime, it will ruin the space itself by its egregious density. I frequently watch the red-tailed hawks nest in the trees in that space, and if 33 units are built in a space zoned for 11, there is no way any of those trees can be saved.. Meanwhile, traffic will become unmanageable. The fire department clearly stated that they do not anticipate being able to get emergency vehicles up those roads if Ivory's plans are put into place.

This is a greedy grab by a rich developer. I look at the rest of the SLC valley in comparison to our Avenues, where I was born (down the street at Holy Cross now Salt Lake Regional) and now live, and it makes me sad that Salt Lake doesn't seem to care about its natural beauty. If Ivory homes is allowed to re-zone that space, what is next--the Bonneville Shoreline? I was born and raised here, then moved to San Francisco for 28 years. You can say a lot of bad things about San Francisco, but I can promise you this--there is no way a greedy developer would be able to re-zone a beautiful space for their own gain to the detriment of residents and nature in San Francisco.

--

Warm Regards,
Sarah Van Voorhis
133 P Street, SLC, UT
[REDACTED]

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Echeverria, Daniel

From: SARAH DAVIES <[REDACTED]>
Sent: Monday, December 13, 2021 10:40 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Opposed to Ivory Homes Re-zone application 675 North F Street

Daniel Echeverria, Senior Planner, SLC Planning Division -- [REDACTED]

Chris Wharton District 3 Salt Lake City Council -- [REDACTED]

Please also copy us at

Dear Mr. Echeverria,

I am opposed to the Ivory Homes Application to Re-zone 675 North F Street for the following reasons:

- The density increase requested by Ivory Homes is concerning given the inappropriate infrastructure to support the decrease in lot size increase of dwellings and ADU's. I am worried about the very small lot sizes, minimal set back, and minimal greenspace. It would drastically change the aesthetics of the neighborhood. There are the additional concerns about water runoff and loss of wildlife habitat. The removal of all mature trees could very much impact the nesting site for red-tailed hawks, which would be very sad to see.
- I am concerned about the increase in traffic and lack of public transport to a non urban area. The Avenues are becoming increasingly crowded with car traffic. The proposed plan could add approximately 70 cars given the limited bus service, that only goes up to 11th Avenue. This would require all families living in this development the need to drive. The City's 5- Year Housing Plan states that high density developments need to be in walkable areas of the city close to shops, restaurants, work, public transport etc... 675 North F Street IS NOT an urban area.
- It is evident that there is strong opposition by Avenues residents. The Upper Avenues community is united in their opposition to Ivory's rezone proposal, with quite literally thousands of residents registering their opposition. In July of 2020, 2,100 Avenues residents signed a petition opposing the rezone. In August 2020, considering Ivory's original concept plan, the vote at the GACC was 688 to 4 against rezoning. In the second GACC vote in April of 2021, considering Ivory's revised plan with 35 dwellings and the SR-1 zone, the vote was an overwhelming 1244 to 25
- The rezoning impacts those residents who have chosen to build homes and pay taxes, expecting that the FR-3 zoning would be enforced in this area.
- Finally, the affordability crisis that Ivory Homes claims to address with these units is a misrepresentation on their part. The proposed sale price of the ADU's is estimated by Ivory to be in excess of \$1 million. This is not affordable to most families and does not address the affordability crisis that exists in Salt Lake City. The rental costs of the ADU's will be high as well, especially when one factors in the need for most of these families to have multiple vehicles.

Along with most Avenue's residents, I am opposed to the re-zoning Ivory Homes is apply to receive. I do hope you will take my concerns into account and will deny the re-zoning request.

I appreciate your time in reading this letter,

Sincerely, Sarah Davies
222 K Street,
Salt Lake City, Utah 84103

Echeverria, Daniel

From: Cynthia Walkowski <[REDACTED]>
Sent: Monday, December 13, 2021 10:00 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Home Re-Zone of 675 North F Street

Dr. Mr. Echeverria,

I am writing to you once again to state my opposition to the Ivory Homes Application to Re-zone 675 North F Street. Below are listed my specific objections.

1. The housing situation for this plot will be too dense, The proposed zoning will reduce the minimum lot size from 12,000 square feet to a minimum size of 5,000 square feet. The current zoning allows for a maximum of 11 primary residences and the proposed re-zoning will increase this number to a maximum of 19 residences. In combination with the rezone to gain more lots, Ivory also seeks to add an Accessory Dwelling Unit to at least 14 of these lots for a total of 33 dwellings, a 300 percent increase. This level of density is inappropriate for this location due to lack of infrastructure to support it and the proposed development is considerably a greater density than any of the existing developments in that vicinity. Very small lots with minimal setback and greenspace requirements are not in keeping with the aesthetics of the neighborhood. This overly dense proposed development poses a threat of water runoff concerns and a loss of wildlife habitat. The proposed development will remove all of the mature trees, which have been a nesting site for red-tailed hawks.

2. Planned Development allows for zone exemptions (PD). Allowing Ivory Homes the ability to request exemptions from a zone's strictures is unacceptable. Not one of the 19 lots meet the rear setback

requirements. Many other exceptions to the zone stipulations are apparent in their plan.

3. SR-1 zoning does not exist in the Avenues. SR-1 zoning allows for taller buildings to be developed which will further add to the bulk of this development.

4. The development will add more than 70 cars to an already crowded traffic situation. There is no convenient public transportation options close to the development to help with decreasing vehicle use. The city's own 5-year housing plan clearly states that high density developments need to be in a walkable area of the city - close to shops, restaurants, work, public transportation, etc. This proposed development does not meet this criteria.

5. Allowing for this proposed development will break faith with the people who purchased homes adjoining this lot who expected that FR-3 zoning would continue to be enforced.

6. The proposed development does not provide for "affordable housing". This development is a ploy from a greedy developer to cram in as many high end homes as possible to make as much money as possible. What is the incentive for the city to allow for this?

7. There is overwhelming opposition to this development from the surrounding Avenues community. We all made our choice to live in the Avenues because of the charm that it exudes. This proposed development, if approved, will certainly take away from that charm and make this area less desirable for the reasons stated above.

Please deny the Ivory Homes re-zone request and preserve the integrity of our Avenues area.

Sincerely,

Cynthia Walkowski
210 E. 6th Avenue
Salt Lake City, UT 84103



Echeverria, Daniel

From: Jack Dolcourt <[REDACTED]>
Sent: Sunday, December 12, 2021 8:17 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Opposition to Ivory Homes application for rezoning 675 F Street

TO: Salt Lake City Planning Division

Daniel Echeverria, Senior Planner

As a resident of the Avenues, I am strongly opposed to Ivory Homes proposal for rezoning the property located at 675 North F Street from FR-3 to SR-1. I have reviewed their most recent proposal, and remain opposed to their proposal for numerous reasons, including (but not limited to):

- The density of the proposed development is out of line with the rest of the Avenues. The proposed development features very small lots, minimal set back and minimal greenspace. This is not in keeping with the aesthetics of the neighborhood. There is no other SR-1 zoning in the Avenues, and SR-1 zoning is inappropriate because the area lacks the infrastructure to handle the increased people-moving that such a development brings. Public transport via bus is limited and as a result most families will be forced to operate at least 2 cars. Increased automobile traffic on the already narrow roads present an increased hazard to Avenue drivers and pedestrians.
- Salt Lake City already lacks sufficient affordable housing, but this development will be non-affordable for most families. The estimated sale price for these homes is in excess of \$1 million.
- Ivory Homes plan is detrimental from an environmental standpoint, because the site is a nesting area for red-tailed hawks and this developer proposed removal of all the mature trees.

There are many other reasons not articulated here why the Ivory Homes proposal is a very bad idea. I am strongly opposed to their application to re-zone 675 North F Street to SR-1. I urge the Planning Division to reject the plan and deny the application to rezone this property.

Sincerely,

Jack Dolcourt
509 Northmont Way
Salt Lake City, UT 84103-3324
[REDACTED]

Echeverria, Daniel

From: Ronald Borg <[REDACTED]>
Sent: Sunday, December 12, 2021 4:26 PM
To: Echeverria, Daniel
Cc: Wharton, Chris
Subject: (EXTERNAL) Ivory Homes on F Street

Dear Sirs: Please deny any change in current zoning rules for 675 N. F Street as applied for by Ivory Homes. This is a ridiculous situation in that the proposed development is far too dense; is entirely different in lot size and setbacks; would greatly add to traffic congestion in that area; and would be a distant outlier from all adjacent homes and buildings that did abide by then- and now-existing zoning restrictions. Also, there is no public transportation that comes within several blocks of this part of F Street, necessitating the need for private-vehicle access only.

This proposed development is entirely out of character for this section of the upper Avenues. We beg that any application for zoning changes of any sort be denied. Thank you.

Ron and Karen Borg
523 N Perrys Hollow Road
SLC

Echeverria, Daniel

From: Tom Walker <[REDACTED]>
Sent: Sunday, December 12, 2021 4:12 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; Alan Hayes
Subject: (EXTERNAL) Ivory Homes rezoning

Daniel,

You've heard from me before, but I'm writing again to voice my opposition to Ivory Homes' rezoning request for the Avenues. I once ran a company that managed municipal debt for many small cities in California and am well aware that developers generally get what they want, whether it is good for the community or not. The community around 675 N F Street enjoys an ambience and quality of life that Ivory's rezoning, if approved, would destroy. They claim their plan will "sensibly increase density," purr words that mean nothing. Yes, it will increase density, but why in this location is that sensible? As long time Avenues residents, we know for a fact that local opposition is overwhelming. Avenues residents are not anti growth - in general there would be little or no opposition to Ivory building the 11 homes current zoning would permit - zoning designed to protect the character and quality of this neighborhood.

Please, we implore you to enforce and maintain the current zoning. To do otherwise would be to ignore the existing residents' wishes for the sake of density expansion no more "sensible" than it would be to pave the 3.2 acres and turn it into a parking lot.

Defend the neighborhood, not the developer!

Tom Walker and Cynthia Shumway
580 E 10th Avenue

--

Tom Walker
[REDACTED]

RE: Ivory's proposal to rezone the lot at 675 N F Street

With each of Ivory's proposals to develop this lot, they have asked for a rezone and now in addition, they are asking for a Planned Development which if granted, would allow them to skirt the height and setback requirements in the SR-1 zone for which they are also applying. With all of these submissions and changes in zoning requests, isn't it evident that this lot just isn't the right place to build this development? Isn't Ivory asking too much of the city?

Ivory claims to be adding to the much needed housing stock in Salt Lake City. These million dollars homes don't add to the housing stock for which the city is lacking. They would like to have you think that these cottages with adjacent ADU's are for multi-generational housing. I think we all know that it won't be long before many of the ADU's are being used for Airbnb units.

Ivory claims they have altered their plans to accommodate some of the requests of the neighbors. Reducing the number of units by 1 isn't really a good faith effort by Ivory to reduce the density. There are still too many units for this lot. A quick study shows that there must be 110 parking places to meet the requirements for the development given the square footage of the cottages. That is a tremendous addition of cars to an already very narrow private road, Capitol Park. As you recall, the city wouldn't even adopt Capitol Park because it was too narrow and too steep. They have done nothing to accommodate our concerns, in fact, they have only increased our concerns. Fourteen foot retaining walls throughout the project certainly isn't consistent with the character of our neighborhood. Minimal green space certainly isn't consistent with the homes in the Avenues. Ivory likes to say that the Avenues has eclectic homes and that is correct. Their development is anything but eclectic----every home will look practically the same. The architecture and exterior features proposed by Ivory don't fit in at all with the unique homes that surround this lot and that exist in the Avenues.

Ivory is asking for too much. They can develop this lot with up to 12 homes with ADU's. Why do they need a zoning change to accomplish what can be done with the current zoning? What is the city getting in return besides hundreds of angry residents if this proposal is approved? The city isn't gaining much needed housing stock. The city has promised to protect the fragile foothills and if this development goes through it threatens a neighborhood that borders a wildlife area. The city cannot bend to the whims of a developer. There are other places for this project that make sense where there is public transportation, access to grocery stores and schools and jobs. This is not the place for Ivory's "ADU rich village." I think we can all agree on that.

Please do the right thing and oppose the rezone and continue to preserve the Avenues.

Thank you,

Jan McKinnon, President
Meridien HOA

Echeverria, Daniel

From: Terrell Smith <[REDACTED]>
Sent: Saturday, December 11, 2021 11:49 AM
To: Echeverria, Daniel; Mayor; [REDACTED]
Cc: [REDACTED]
Subject: (EXTERNAL) RE: Re-Zone 675 North F Street

Honorable Mayor Mendenhall and Messrs. Echeverria and Wharton:

We remain strongly opposed Ivory Home's revised plan and rezoning of their Avenue property from FR-3 to SR-1. In addition to the transportation issues and other problems this over density would create, Ivory Homes' homes are cookie-cutter designs that would depreciate values of the current avenue homes and jeopardize the eclectic nature of this Historic Neighborhood.

Please do not approve Ivory Homes' request.

Respectfully,

Terrell W. Smith
180 N "S" Street (1980-2002)
1244 Chandler Circle (2002-present)
Salt Lake City, UT 84103
Email: [REDACTED]

From: Terrell Smith [mailto:[REDACTED]]
Sent: Saturday, February 13, 2021 7:35 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Re-Zone 675 North F Street

Dear Mayor Mendenhall and Messrs. Echeverria and Warton:

Our family has reviewed Ivory Homes revised proposal for the rezoning of 675 North F Street and we remain strongly opposed to its request to rezone this property. We have owned property and resided in the Avenues since 1980. Part of the Avenues' charm is that it has not been overdeveloped. Rezoning this property would set a dreadful precedent and could open the door for other developers to further over develop our neighborhood.

Respectfully,

Terrell W. Smith
180 N "S" Street (1980-2002)
1244 Chandler Circle (2002-present)
Salt Lake City, UT 84103
Email: [REDACTED]

Echeverria, Daniel

From: Candice Marx <[REDACTED]>
Sent: Saturday, December 11, 2021 6:25 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Home Re-Zone

Good morning Mr. Echeverria,

My email today is to express my strong opposition to Ivory Homes Application to Re-zone 675 North F Street. My understanding is that this re-zone will allow 19 homes in an area zoned for 11 homes, increase the amount of traffic in the already condensed area by 70 cars and set a precedence for SR-1 zoning (zoning which does not currently exist in the Avenues). In addition, this dense clustering of homes raises concern for water runoff and loss to wildlife, specifically red-tailed hawks. The Avenues is a community with a culture which values its current zoning practices. This re-zone will break faith with homeowners who already bought homes in adjoining lots, who expected the FR-3 Zoning to be upheld. This was one of the draws for purchasing a home in this area. I personally do not want this re-zone, whose density is considerably greater than any other existing developments, which aims to increase ADUs at a 300% increase, and adds fuel to the current housing crisis (million dollar homes are not affordable or alleviating the housing crisis). I ask you to take into consideration my opinion and the opinion of the 2100 residents who signed a petition in July of 2020 in opposition to this re-zone.

Kind regards,

Candice Marx

Echeverria, Daniel

From: Jill Kinney <[REDACTED]>
Sent: Friday, December 10, 2021 6:26 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Homes Latest Re-Zoning Proposal for 675 North F Street

Daniel Echeverria
Senior Planner
SLC Planning Division

RE: Ivory Homes Latest Proposal to Re-Zone 675 North F Street, SLC

Mr. Echeverria:

Once again I have reviewed Ivory Homes' latest proposal to re-zone the property located at 675 North F Street and believe that Ivory's current proposal, like their original proposal, is still too dense for this section of the Avenues which is zoned as a Foothills Residential property. All of the points made in my February 26, 2021, letter still stand. This is not the right sight for what Ivory is trying to do. Our current zoning laws are in place for very good reasons. Ivory is still asking for a 300 percent increase in dwellings on this 3.2-acre lot.

My sense is that Ivory doesn't really have any long-term concerns with their request for re-zoning. It seems their short-sighted desire is, of course, to make a ton of money and receive awards and accolades for incorporating an unreasonable number of dwellings on the smallest possible space under the pretense of creating affordable housing and solving Salt Lake City's housing crisis. Please review Ivory's proposal carefully and take into consideration the points I have made in my previous letter and those made herein.

Respectfully,

Jill Kinney
461 E 13th Avenue
SLC, UT 84103

Echeverria, Daniel

From: Jeff Polychronis <[REDACTED]>
Sent: Friday, December 10, 2021 2:53 PM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) Ivory Homes

Dear Mr. Echeverria,

I write to voice my opposition to Ivory Homes' most recent request to rezone the property at Capitol Park Avenue and F Street.

The proposed density is inappropriate for the area. If approved, it will significantly increase traffic and noise. As you know, F Street is very steep and in icy conditions, dangerous. Increased traffic will add to the danger. The other egress from the property would be Capitol Park Avenue, a private street and also very steep. F Street and 13th Avenue is currently a bus stop, which creates serious visibility concerns for both cars coming up the hill and for pedestrians, including the many children who cross these streets on their way to Ensign Elementary.

The aesthetic of this neighborhood is part of what gives the community its charm and livability. Ivory's proposed development is not consistent with the surrounding neighborhood. As you know, two nearby buildings are the original VA Hospital and later on, Primary Children's Hospital. Both are now residential. I live in one of these buildings, The Meridien. Those of us that purchased at The Meridien and those that purchased homes nearby in Capitol Park and the Avenues, did so believing that the zoning of the Ivory property would remain FR-3, and that development would be limited to the permitted density therein. Granting Ivory's request for rezone would break faith with those of us who chose to build our lives and pay our taxes in this Salt Lake City neighborhood.

I respectfully ask that the Planning Division and the City Council deny Ivory's request for rezoning.

Thank you,

Jeff Polychronis
[REDACTED]

Echeverria, Daniel

From: John Kennedy <[REDACTED]>
Sent: Friday, December 10, 2021 2:50 PM
To: Echeverria, Daniel
Cc: [REDACTED] Jan McKinnon
Subject: (EXTERNAL) Ivory Homes: 675 N F Street

Mr. Daniel Echeverria
Salt Lake City Government Offices
Planning Department
[REDACTED]

Re: Proposed Zoning Change at 675 North F Street, Salt Lake City

Dear Mr. Echeverria:

At the invitation of the City, this letter is sent to convey my continuing strong objections to Ivory Homes' requested zoning change and planned development exceptions for the 3.2 acre lot located at 675 North F Street. I believe this is the THIRD letter I have written to you about this matter over the past two years. Ivory's current plat plan appears to be largely identical to its prior proposals. As a result, some of my prior concerns are included along with some of the new issues discussed below. Ivory's plan simply does not meet any of the City's needs for affordable housing and is not in compliance with the City's requirements for planned developments. Ivory's request for approval of its "million-dollar starter homes" and its "multi-generational" cottages clearly should be rejected.

My full-time residence, where I have loved to live for 14 years, is located adjacent to the subject property. As is true for me and many of my neighbors, I drive past this lot on average multiple times each day. With the permission of the prior lot owner, my wife and I (along with a number of others in the surrounding neighborhood) planted and raised vegetables in neighborhood gardens on this property over several recent summers. I have enjoyed watching deer graze on the wild grasses on the lot. I have watched red-tail hawks circle above it and nest in the trees located on it. I have marveled at the activities of what appear to be small prairie dogs who have excavated their burrows in the soft soils of the lot.

Ivory's proposed changes for this property would allow a much more dense development of the land than exists at this time on neighboring properties—a development which would end all of these wild-life activities on the subject lot. I recognize, of course, that virtually any development of the property would affect such things as well. The proposed changes, however, will also bring unwanted and potentially hazardous modifications, not only to the lot itself, but to the adjoining neighborhood as well.

For example, the proposed changes would allow a developer to place 19 primary homes and another 19 to 24 ADUs on the subject lot. The adjacent families now living to the north of the lot on the 13+ acres of North Point Estates have only one exit (to F Street) from that development. In the event of a fire or other emergency requiring prompt evacuation, dense development of the subject property per the proposed development plan (allowing a potential of an additional 70+ autos to the area) would create a "choke point" at 13th Avenue and F Street, making safe and prompt access or exit for fire and/or emergency vehicles impossible. During any prolonged construction period, this problem would be significantly enlarged. Icy

conditions during winter months makes matters even worse on F Street between 11th and the Northpoint entrance.

In addition, Ivory's new draft plat map now shows even narrower internal streets within Ivory's proposed development, smaller setbacks, extraordinarily tall and unsightly retaining walls (some as high as 14 feet), and a potential for 110+ resident vehicles (plus added guest vehicles)—all crowded onto this site or the bordering streets. I cannot imagine how an EMT truck and an accompanying fire engine would be able to enter into this site on the only internal (narrow) roadway and proceed to some of the proposed development's interior residences and then quickly exit under conditions where life and death depend upon seconds. Permitting such a situation to be created by Ivory would constitute gross negligence by the City.

Currently, it is also true that the infrastructure for this immediate area is inadequate for the proposed development. Families living in the North Avenues neighborhoods most often drive from their homes to 11th Avenue, thence to Virginia Street, I Street, E Street, or B Street, to go to work, schools, churches, or stores. There are no food stores, shops, business centers, churches, or schools located within easy or safe walking distance of this property. Access to such facilities via the steep Avenues streets is practical only by motorized vehicles. Rarely do even cyclists attempt to travel north upward on B through K Streets to locations above 10th Avenue. This has resulted in making 11th Avenue a thoroughfare for walkers, runners, and cyclists (heading west or east to or from City Creek Canyon). The proposed change would increase the number of pedestrians and vehicles traversing 11th Avenue. Such an increase in traffic on the already-narrow 11th Avenue would raise the danger of serious injuries to those now using that route.

Ivory offers a self-serving "transportation study" which is now out-of-date. Its numbers are grossly inaccurate (according to actual counts by neighbors) and misrepresent the actual availability of current public transportation resources.

The nearest elementary school is more than a half-mile to the east of the property, too far for young children to walk safely. Junior high schools and high schools are much farther distant. There is no park within one-quarter mile, and the nearest developed park is more than one-half mile distant. The unimproved "park" area shown on Ivory's plat map is not adequate for any significant purpose.

Thus, the proposed deviation from the current zoning is not suitable to this area and should not be allowed. Over the past two years, I have spoken with literally dozens of people in this Avenues area. I have yet to find a single person who would favor the proposed change. In poll after poll conducted by the Greater Avenues Community Council, hundreds and hundreds of Avenues residents have voiced their disapproval of Ivory's plans, while only a couple dozen have favored them.

Ivory has suggested that the City should approve Ivory's proposed planned development, thus allowing Ivory to evade the requirements of applicable SR-1 zoning provisions. The City has indeed allowed some planned developments in other instances where the developer has met the standard of "a more enhanced product" not available under applicable zoning. However, Ivory's proposal does not satisfy that requirement. A permissible planned development must be at "a scale typical to the neighborhood." But, Ivory's proposal is overwhelmingly more dense than that of the surrounding neighborhood and is not at all typical to the neighborhood. Ivory's suggestion that the planned development is needed to permit a homeowner to add an ADU is also specious. The City's present laws permit any homeowners who comply with the existing ordinances to place an ADU on their property—a planned development is not needed to do this. The City gains very little from Ivory's plans for this lot, and the surrounding community along with future residents of the area suffer considerably.

On the basis of the foregoing and on the basis of the materials submitted earlier to your office by me, I request that your office recommend against the proposed changes in zoning and I request that you also reject Ivory's request for approval of proposed exceptions to the applicable standards by the use of a planned development. The City should require that any development of this property should conform to the present zoning.

Yours very truly,
/s/
John Paul Kennedy

--
John Kennedy
805 N. Grandridge Drive
Salt Lake City, Utah 84103
[REDACTED] (cell); [REDACTED] (Home)
[REDACTED]

Echeverria, Daniel

From: KC Brennan <[REDACTED]>
Sent: Friday, December 10, 2021 1:17 PM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Homes Rezone

Dear Mr. Echevarria

I am writing again to express my opposition to the new Ivory Homes Rezone proposal.

Specifically, I oppose the rezone from FR-3 to SR-1

My primary reasons remain the same as in my prior letter. We are an already densely settled neighborhood with strained traffic, street, and parking resources, in a vulnerable foothills ecosystem.

The minimal substantive changes made in the new proposal, as well as the strategic launching of the new proposal with a timeline that minimizes public commentary are disconcerting. They show a distinct lack of good faith and give me little confidence that Ivory Homes has any intention of considering the neighborhood except as a profit source.

Please do not hesitate to contact me if you require any further information.

Sincerely

KC Brennan
737 North Hilltop Rd

Echeverria, Daniel

From: Bert Korneyi <[REDACTED]>
Sent: Friday, December 10, 2021 10:51 AM
To: Echeverria, Daniel
Cc: Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Homes Application to Re-zone 675 North F Street

I am writing this email in opposition to the application by Ivory Homes to rezone 675 North F Street. I am a resident of the Avenues and strongly oppose this application that will permanently change the character of the Avenues. Here are some of the reasons this development must not happen!

1. **Too Dense**

- a. Ivory is seeking a rezone from the current FR-3 zoning which has a minimum lot size of 12,000 square feet to SR-1 which has a minimum lot size of 5000 square feet.
- b. Under current FR-3 zoning the maximum number of primary residences is 11; Ivory is requesting 19 in this latest application
- c. In combination with the rezone to gain more lots, Ivory also seeks to add an Accessory Dwelling Unit (ADU) to at least 14 of these lots for a total of 33 dwellings, a 300 percent increase.
- d. This level of density is inappropriate for this foothills location that lacks the infrastructure to support it.
- e. The density of Ivory's proposed development is considerably greater than any of the existing developments in the vicinity.
- f. Very small lots, minimal set back and minimal greenspace are not in keeping with the aesthetics of the neighborhood
- g. This overly dense proposal raises concerns regarding water runoff and loss of wildlife habitat.
- h. This site has long been a nesting site for red-tailed hawks. Ivory proposes to remove all of the mature trees.

2. **Planned Development allows zone exemptions (PD).** Ivory requested a PD in their June 2021 application. A PD was apparently not in the picture for Ivory until they fixed on SR-1 as a target zone and realized that they could not meet the zoning requirements of this zone, particularly in regard to lot sizes and setbacks. A PD provides a mechanism for a developer to request exemptions from a zone's strictures. For example, 6 of 19 of Ivory's lots are less than the required 5,000 square foot minimum for SR-1. Not even one of the 19 lots meet the rear setback requirements. Many other exceptions to the zone stipulations are apparent in their plan.

3. **SR-1 zoning does not exist in the Avenues.** Ivory is requesting SR-1 zoning. This zone does not exist in the Avenues; much of the Avenues is zoned SR-1A, which is a revision of SR-1 designed to avoid problems that arose with SR-1. While these zoning codes are similar, SR-1 allows taller buildings further adding to the bulk of this development

4. **This development will add around 70 cars**

- a. Public transport options are limited to the #11 bus that runs once per hour, now only comes as far north as 11th Avenue, ceases operation at 8 PM and does operate on weekends. To get downtown, one must transfer to the #6 bus, adding to the journey time. This is insufficient to satisfy most families' needs and, by necessity, most 2 adult families will

be forced to operate two cars. With 33 dwellings this equates to almost 70 cars

b. The City's 5-Year Housing Plan clearly states that high density developments need to be in walkable areas of the city close to shops, restaurants, work, public transport, etc. This is not such an urban location.

c. 70 cars add to the city's air pollution problem and lead to greater congestion on our already crowded Avenues streets.

d. The corner of F Street is a bus stop for children attending both middle and high schools. Mixing more cars with sleepy kids on dark winter mornings is not a great idea.

e. The slope of F street between Capitol Park Avenue and 11th Avenue is very steep and a known winter traffic hazard.

5. **Breaks faith.** People who purchased homes adjoining this lot expected that FR-3 zoning would continue to be enforced. Changing this zoning so drastically breaks faith with these residents who have chosen to build their lives and pay their taxes in Salt Lake City.

6. **Not affordable.** With skyrocketing real estate values and an influx of new residents, the city has a housing affordability crisis. Ivory claims that this development helps alleviate that crisis. This is nonsense. The proposed sale price on the homes with ADUs is estimated by Ivory to be in excess of \$1 million, hardly affordable to most families. The rental costs on the ADUs are likely to be correspondingly unaffordable, especially when one factors in the need for most two adult families to operate two cars.

7. **Capitol Park Avenue is a private road.** Capitol Park Avenue is a private road owned by Capitol Park and The Meridien and was designed and constructed to meet the limited needs of this low-density community. For the ten-year period between 2005 and 2015, the Capitol Park and Meridien HOAs petitioned the City to take ownership of and maintenance responsibility for this private street. The City refused on the basis that Capitol Park Avenue was too narrow and did not meet City construction standards. Now Ivory Homes asks you to disregard the zoning that has guided the development of this area over the past 35 years and they want you to allow the only access for the interior 28 dwellings to be onto the privately owned Capitol Park Avenue.

8. **Strong opposition in Avenues.** The Upper Avenues community is united in their opposition to Ivory's rezone proposal, with quite literally thousands of residents registering their opposition. In July of 2020, 2,100 Avenues residents signed a petition opposing the rezone. In August 2020, considering Ivory's original concept plan, the vote at the GACC was 688 to 4 against rezoning. In the second GACC vote in April of 2021, considering Ivory's revised plan with 35 dwellings and the SR-1 zone, the vote was an overwhelming 1244 to 25.

Thank you for your consideration,

Norbert J Kornyei

Echeverria, Daniel

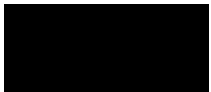
From: Allison Fernley <[REDACTED]>
Sent: Friday, December 10, 2021 10:53 AM
To: Echeverria, Daniel; [REDACTED] Wharton, Chris
Subject: (EXTERNAL) Ivory Homes Proposed Zoning Change

My name is Allison Fernley and I live at 474 East 10th Avenue.

I am writing to you regarding the proposed development at the address 675 N F Street. I am in favor of keeping this property zoned as FR-3 and having the property developed under current zoning regulations. I am opposed to the application requesting a change to FB-UN1 from FR-3 zoning. The denser zoning would be inconsistent with the Avenues Master Plan and our surrounding neighborhoods.

Thanks for listening.

Allison Fernley



(Cell)

Echeverria, Daniel

From: Andrew Keach <[REDACTED]>
Sent: Thursday, December 9, 2021 11:49 PM
To: Echeverria, Daniel
Cc: Wharton, Chris
Subject: (EXTERNAL) Re-zone 675 N F St

As a resident of 368 E. 12th Ave. I would like to voice my displeasure with the proposed development. It is excessive and will change the quiet character of the upper avenues including a massive increase in traffic.
Andrew Keach

> Sent from my iPhone

Echeverria, Daniel

From: Ira Hinckley <[REDACTED]>
Sent: Thursday, December 9, 2021 8:07 PM
To: Echeverria, Daniel; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) NO to special privileges for Ivory Homes

Dear Sirs:

I have reviewed Ivory's revised proposal and remain OPPOSED to the rezoning of 675 North F Street.

This level of density is completely inappropriate for this area. Why should Ivory Homes be granted special privileges to change zoning to develop this area when no one else has been allowed to change zoning laws for their own benefit.

They want to use Capito Park Avenue which is a private road they didn't pay for.

We in the avenues have come out in the THOUSANDS to protest this ultra dense disaster, yet Ivory continues to act in BAD FAITH and cram their agenda down our throats.

AGAIN, WE ALL SAY NO TO IVORY REZONE!!!!

Ira Hinckley
avenues resident

Echeverria, Daniel

From: Janet O'Neill <[REDACTED]>
Sent: Thursday, December 9, 2021 6:45 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Redone for Ivory Homes

I oppose the rezone of north F St. I am a resident of F St and I don't want to see an increase in traffic, as this Ivory plan will bring.

Also too many housing units are proposed for the size of the lot, creating congestion and disorder.

I'm also concerned about preserving open spaces. I would like to see this area developed into a natural preserve park. It is close to the foothills and could serve as a stepping stone to the natural landscape.

In addition the Ivory modus operandi, is to build cheaply and unimaginatively. The historic nature of the avenues must be cherished and not destroyed by building a section of houses that do not fit into the neighborhood.

I respectfully submit my concerns to the City.

Janet Taylor ONeill
187 F St
[REDACTED]

Sent from my iPhone

Echeverria, Daniel

From: carmen tjoens <[REDACTED]>
Sent: Thursday, December 9, 2021 6:02 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Rezoning F street is the Avenues

Dear Sir,

As a resident of the SLC avenues I continue to oppose the rezone from FR-3 to SR-1 proposed by Ivory homes.

The reasons stay the same as the original.

It is paramount to stick to the original zoning laws and not set a precedent for other future potential developers.

It's precious green space that is going to be lost and we don't need more traffic.

Thanks for your time.

Carmen T'Joens

oppose the rezone from FR-3 to SR-1.

Sent from my iPhone

Echeverria, Daniel

From: Joseph Cook <[REDACTED]>
Sent: Thursday, December 9, 2021 4:40 PM
To: Echeverria, Daniel
Cc: Wharton, Chris
Subject: (EXTERNAL) Ivory homes latest rezoning request for 675 F Street.

Dear Daniel Echeverna,

I have written to you previously with respect to a rezoning request from Ivory Homes for the property at 675 F Street. I have also written and talked to Chris Wharton. It feels to me like Ivory Homes is determined to have their way and are hoping those of us who oppose the rezoning will just give up. In other words they are counting on our attrition. They have chosen a time of year when they feel we will be less likely to respond.

I along with my wife Nancy live at Northpoint at the top of F Street. We decided to move here after we reached retirement age having lived in the Philippines, California, Connecticut and Pennsylvania. As it turned out I have spent the last 13 years as a physician working for the State of Utah at the Utah State Developmental Center and my wife and I are now what you would consider elderly. We have been married for 63 years. I am not an elitist and have spent a career caring for the poor and the disadvantaged. It seems to us that it would be bad faith for the city to change the zoning in our area after all these years. We decided on our location with expectations based on the history of the avenues and zoning restrictions.

However, there are many other reasons we oppose this rezoning.

- The density of the proposed rezone area is a concern. When we leave our gate at Northpoint the road grade is very steep and during winter this can be hazardous. Adding a significant number of cars to traffic through this area is a problem.
- This is not only a problem for us, but also a problem for children at the bus stop.
- The access road to the planned development is a private road not owned by the city. It is narrow and adding a significant number of units to the area, more by far than those that would result from the current zoning creates additional problems.
- The planned development is not near public accommodations such as restaurants and shopping or adequate public transportation
- The proposed development is far from affordable.

We understand there have been some modifications from previous proposals, but in our view these modifications are minimal. Ivory Homes is simply trying to increase the density of their housing development for pecuniary reasons, they are not doing this for altruistic reasons as a favor to the city or anyone else.

Sincerely,
Joseph V. Cook, M.D.

Sent from [Mail](#) for Windows 10

Echeverria, Daniel

From: Judy Rose <[REDACTED]>
Sent: Thursday, December 9, 2021 4:33 PM
To: Wharton, Chris; [REDACTED] Echeverria, Daniel
Subject: (EXTERNAL) Ivory Homes Proposed Zoning Change

My name is Judy Rose and I live at 474 East 10th Avenue.

I am writing to you regarding the proposed development at the address 675 N F Street. I am in favor of keeping this property zoned as FR-3 and having the property developed under current zoning regulations. I am opposed to the application requesting a change to FB-UN1 from FR-3 zoning. The denser zoning would be inconsistent with the Avenues Master Plan and our surrounding neighborhoods.

Thanks for listening

Judy Rose
[REDACTED] (Cell)

Echeverria, Daniel

From: Nowsc <[REDACTED]>
Sent: Thursday, December 9, 2021 4:16 PM
To: Echeverria, Daniel
Cc: Wharton, Chris
Subject: (EXTERNAL) Our Objection to Ivory Homes' proposal 675 N F st. SLC

Regarding that Ivory Homes re-zone of 675 North F Street, I still I am opposed to this thing even in light of your latest proposal; my & our family's objections remain the same. Please don't do this in our neighborhood! This is not the right place for that many people, we can't support it here. And we don't want to support it here. We need more electric car charging stations! And better ones! Please reply saying that you have received my letter. Thank you kindly in advance.

Kindest regards,

-- Harald Illig, a neighbor

| _____ | Y

Echeverria, Daniel

From: David Egelston <[REDACTED]>
Sent: Thursday, December 9, 2021 4:04 PM
To: Echeverria, Daniel
Cc: [REDACTED] Wharton, Chris
Subject: (EXTERNAL) 675 North F Street

Dear Mr. Echeverria,

As an Avenues resident, I strongly oppose the application to re-zone 675 North F Street from FR-3 to SR-1. The proposal seeks a 300% increase in the amount of dwellings permitted.

Public transportation is very limited in this area, shops and services are not within a walkable distance, and bicycling is not practical for most because of steep streets and the great elevation change from downtown to this location.

If the application is approved, approximately 70 additional cars and trucks will have to somehow squeeze into this neighborhood.

The city needs high density housing, but it needs to be in walkable areas close to shops and services.

Thanks for your consideration of this matter.

Sincerely,
David Egelston
Avenues Resident

Echeverria, Daniel

From: Jane Durcan <[REDACTED]>
Sent: Thursday, December 9, 2021 3:45 PM
To: Echeverria, Daniel
Cc: [REDACTED]
Subject: (EXTERNAL) Ivory homes Rezone on F street

Dear Mr Echeverria

I am writing to state my objections to the proposed rezoning of the land at 675 North F Street from FR-3 to SR-1. There are numerous reasons why this is a terrible idea. The land is currently zoned for 11 dwellings. The proposed change would allow 33 dwellings. This is completely out of character with the remainder of the avenues. there are added concerns of increased water run off and loss of wild life habitat with removal of trees in the area. Frankly one of my biggest concerns is the increased traffic in the area. This development could easily add an additional 70 vehicles to the area. There are children who walk down these streets, that are sometimes without sidewalks to get to the elementary school or to catch the bus to school. This increase in car density would be extremely dangerous. There are not stores within walking distance so cars would be required for occupants of these homes. There is only one bus running along 11th Avenue to service this area and most people will not be using it. This is a huge issue for child and other pedestrian safety. It is also completely unfair to those residents who bought homes in the area assuming that if that land was developed it would follow the current zoning laws. A development with this many proposed dwellings would affect the aesthetics of their homes and their property values. We should not break faith with the current owners of property in the area. the argument that this development would bring affordable housing into the area is ludicrous. Clearly any homes built in this area will be at least in the \$1,000,000 range if not more and will not be in the least bit affordable. I urge to reject this proposal from Ivory Homes and keep the current zoning.

Sincerely

F Jane Durcan.

504 E 13th Avenue

Echeverria, Daniel

From: David Maher <[REDACTED]>
Sent: Thursday, December 9, 2021 9:50 AM
To: Echeverria, Daniel
Cc: Mayor; Wharton, Chris; [REDACTED]
Subject: (EXTERNAL) Ivory Homes Amended Application to Rezone

We are writing to express our opposition to the amended application to rezone 675F street. The same concerns remain .The present zoning which would allow 11 home sites to be built would maintain the continuity of the existing neighborhood. the Ivory proposal produces a high density setting creating issues with increased traffic,demands on fire and police protection,utilities will be challenged to meet required needs. Environmental concerns must be raised because of the proposed density levels .We should be making every effort to maintain our neighborhoods in the best possible manner .Ivory proposal does not enhance our community and should be denied.

David and Marilyn Maher
400 East Capitol Park #202

Echeverria, Daniel

From: [REDACTED]
Sent: Tuesday, December 7, 2021 10:04 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Re: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

Daniel,

Please, please no Ivory rezone at the top of F Street!!!!

Choose to be safer online.

Opt-in to Cyber Safety with NortonLifeLock.
Get Norton 360 with LifeLock starting at \$9.95/month.*
[NetZero.com/NortonLifeLock](https://www.netzero.com/NortonLifeLock)

Echeverria, Daniel

From: Nathan Peters <[REDACTED]>
Sent: Monday, December 6, 2021 6:42 PM
To: Echeverria, Daniel; [REDACTED]
Subject: (EXTERNAL) Support for Capitol Park Cottages

Hi Daniel, Chris,

I hope this email finds you well and healthy. I am writing to you in support of the Capitol Park Cottage project by Ivory Homes located at 675 N F Street. I'll be upfront in stating that I may be slightly biased, in that I love this area and its close proximity to the best combinations of work and play that the state has to offer. I run in the Aves and/or City Creek almost every day. We take walks at Hilltop, run across BST regularly. I've dreamed of living in the Aves. But unfortunately my wife and I have struggled mightily to get a home in the Aves and have been outbid countless times. There aren't many development opportunities remaining, and this may be one of the best chances we have to secure what could be a forever home in the area we love most.

On the rezone, I believe the applicant has taken great consideration with their proposal. The 19 unit plan accomplishes much needed housing additions while respecting the architectural feel of the neighborhood. And the overall density of the project is largely in line with that of the surrounding lots and maintains more space than the vast majority of avenues blocks. Many of the neighbors in close vicinity are lots comparable to what is proposed here. I also don't have any noteworthy concerns that some have shared on traffic increase--the higher density developments of the Meridian and Northpoint Condos absorb theirs just fine, and I've never noticed traffic issues in the area. Ivory could have easily developed in line with the existing zoning and perhaps if acting purely out of economic self interest, they would have built 10-12 homes and sold for \$1.5-2mm+, putting them out of reach for the majority of hopeful homeowners. I've been impressed with their commitment to address housing needs here even if it wasn't the most financially rewarding approach for them.

It's also quite innovative and something that I think many people could benefit from. My wife and I would get great benefit from an accessory dwelling unit, as we've recently relocated her widowed mother to SLC from Las Vegas. We'd get a lot of comfort and ease having her close by (but still separate!). Regarding the amendment to the Master Plan. I think we can all agree that housing needs have changed dramatically since the inception of the Avenues Master Plan in 1987. Capitol Park seems to be very well in line with the goals of SLC's 5 year housing plan and Plan Salt Lake principles. I think we should be excited about this project and embrace the opportunity it presents. With the amount of thought that's gone into the proposal I would be confident in its implementation.

Overall I believe this proposal is well thought out and designed, while simultaneously furthering much needed housing opportunities in one of the best neighborhoods in the state. The benefits and goals accomplished through this project significantly outweigh what some have put forth as detractors. I would urge you to approve the proposals put forth.

Respectfully,
Nathan Peters
[REDACTED]

Echeverria, Daniel

From: rodrigo schmeil <[REDACTED]>
Sent: Monday, December 6, 2021 12:48 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) RE: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

Daniel,

Thanks for the notice on the ivory development, and to say that I am extremely disappointed that the City is still entertaining the idea of rezoning a piece of our historic charming iconic neighborhood to accommodate a greedy developer, who has shown that he has no interests in preserving our neighborhood, or even helping the community, all they are concerned about is their profits, they will come, build the awful 19 houses, ruin our neighborhood, make his proffit and move on. We neighbors are the one who will have to deal with the consequences of this ridiculous decision that the city keeps entertaining. PLEASE, as a neighbor who LOVES my neighborhood, and CHOSE to invest my money and raise my family in this neighborhood, I BEG the city not to move forward with this. The upper avenues cannot handle the proposed development, there is NOTHING on walking distance, we don't even have sidewalks for our kids and dogs to walk on and public transportation is not anywhere near where it needs to be if we want this to be a DENSE zone. If Mr Ivory wants to develop land, and help the housing market with "low income housing" there is PLENTY of land elsewhere to invest, develop and make his money. There is a reason why we love the avenues and a reason for the current zoning, please help us preserve it. The neighbors have voted already (688 opposed and 4 in favor) and it is REALLY clear what our position is. Lets please set aside the money power and influence that Clark Ivory has, and listen to the people who LIVE there everyday.

Rodrigo Schmeil.

Echeverria, Daniel

From: Merritt Stites <[REDACTED]>
Sent: Friday, December 3, 2021 10:09 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Re: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

Dear Daniel:

Thank you very much for keeping us apprised of the events surrounding the F Street proposal by Ivory Development. Please, please, please do NOT allow a rezoning of the Avenues. This area is unique and an incredible place to live within a city undergoing unprecedented change. Ivory Development has already put an unwelcome mark all over the valley and changing the zoning would only allow their company to infiltrate other spaces in the Avenues. Ivory lives in Holladay on Walker Lane in his own many acres of woods. He has no idea what his greed will do to our neighborhood and it needs to be stopped. I appreciate your continued thoughtfulness about this issue.

Merritt Stites,
559 10th Ave

On Nov 29, 2021, at 4:47 PM, Echeverria, Daniel <[REDACTED]> wrote:

A small clarification on the below notice e-mail - The lots proposed along F Street (Lots 1 to 5) are proposed to be custom homes and so may or may not ultimately include an accessory dwelling unit. Each single-family home accessed from the internal private street (Lots 6 to 19) is proposed to include an internal accessory dwelling unit when built.

DANIEL ECHEVERRIA

Senior Planner
Planning Division

DEPARTMENT of COMMUNITY and NEIGHBORHOODS
SALT LAKE CITY CORPORATION

TEL [REDACTED]
EMAIL [REDACTED]

www.SLC.GOV/PLANNING
www.OurNeighborhoodsCAN.com

From: Echeverria, Daniel
Sent: Monday, November 29, 2021 3:59 PM
Subject: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

Good afternoon,

You are being provided this update about the 675 N F Street development proposal as you have previously contacted the Salt Lake City Planning Division about the property owner's development proposal.

The property owner, Ivory Development, originally submitted a Zoning Map and Master Plan Amendment to the City in 2020. The applicant requested that the City pause processing those petitions while they refined their proposal and has now submitted a Planned Development and Preliminary Subdivision application to accompany those two original petitions.

Echeverria, Daniel

From: Jason Bresley <[REDACTED]>
Sent: Friday, December 3, 2021 4:24 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) Re: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

My comments regarding Ivory Homes adding more homes:

I truly hope the council votes NO to this “development plan” as it will ruin the integrity of the neighborhood in so many ways. First, it’s already an established neighborhood with TOO MUCH TRAFFIC as it is!! Adding more units will only increase the amount of cars and trucks parked on the side of the roads—ESPECIALLY if you allow multi-unit dwellings. More traffic will also bring more crime to the area. If the intent is to provide more “affordable housing” to the community (as was their pitch last time), then this is NOT the place to develop. There are PLENTY other places to develop that would be better placed to meet the needs of people needing affordable housing, that would be better suited than in the Avenues. There are no businesses in the area to accommodate the needs of such. The current infrastructure with the increased traffic only poses a safety risk for our children who don’t have enough sidewalks to walk on. This proposal is the work of a greedy man who has no regard for the wants and desires of the community he claims to care about (hence why he continues to ignore the voices of the community who are avidly opposed to his proposal) and is continuing his development plan in order to line his pockets with more money. VOTE AGAINST THIS PLEASE!!

On Nov 30, 2021, at 01:47, Echeverria, Daniel <[REDACTED]> wrote:

A small clarification on the below notice e-mail - The lots proposed along F Street (Lots 1 to 5) are proposed to be custom homes and so may or may not ultimately include an accessory dwelling unit. Each single-family home accessed from the internal private street (Lots 6 to 19) is proposed to include an internal accessory dwelling unit when built.

DANIEL ECHEVERRIA

Senior Planner
Planning Division

DEPARTMENT of COMMUNITY and NEIGHBORHOODS
SALT LAKE CITY CORPORATION

TEL [REDACTED]
EMAIL [REDACTED]

www.SLC.GOV/PLANNING
www.OurNeighborhoodsCAN.com

From: Echeverria, Daniel
Sent: Monday, November 29, 2021 3:59 PM
Subject: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

Good afternoon,
You are being provided this update about the 675 N F Street development proposal as you have previously contacted the Salt Lake City Planning Division about the property owner’s development proposal.

The property owner, Ivory Development, originally submitted a Zoning Map and Master Plan Amendment to the City in 2020. The applicant requested that the City pause processing those petitions

Echeverria, Daniel

From: Noah SWANSON <[REDACTED]>
Sent: Thursday, December 2, 2021 1:00 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Petition Numbers: PLNPCM2020-00334/00335, PLNPCM2021-00656, PLNSUB2021-01175

CONFIDENTIAL & RESTRICTED

Daniel,

I live within the Avenues and am opposed to increasing the density through rezoning. I am worried about the impact the rezoning will have to traffic through the neighborhood. There have been too many bad exceptions to zoning throughout the avenues which has led to some really bad development. I would like the zoning to remain the same. They are just looking to cram in as many cookie cutter homes as they can and we don't need high density McMansions.

-Naoh

Echeverria, Daniel

From: [REDACTED]
Sent: Tuesday, November 30, 2021 11:34 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) 675 North F Street Rezoning

Mr. Echeverria:

Per your email regarding rezoning this area from its current status: as a resident of the Avenues I oppose any change from the current status and I particularly oppose the Ivory Homes proposal to create 19 homes with proposed ADUs. They should build according to current zoning requirements.

Thank you for your time and consideration in this matter.

William Woods
424 J Street
SLC, UT 84103
[REDACTED]

Sent from my iPhone

Echeverria, Daniel

From: Lori Trumbo <[REDACTED]>
Sent: Tuesday, November 30, 2021 8:20 AM
To: Echeverria, Daniel
Subject: (EXTERNAL) 675 N F St., SLC

The Avenues have always been a unique and eclectic neighborhood. Other than Lindsey Gardens park at the opposite side, the Avenues does not have a lot of usable public green space for its residents. I would prefer to see this beautiful plot of land used for that purpose rather than creating an essentially gated community with its own small private park and parking lot.

Lori Trumbo
717 E 5th Ave. #207

Echeverria, Daniel

From: David Tanner <[REDACTED]>
Sent: Monday, November 29, 2021 6:34 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Re: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

I read this with much dismay. Here we go again with Ivory Homes. The city, What department has granted this pause in procession. I don't see that we owners who will be affected would be granted any pause if requested. The existing code has been in place for how long. We should live with it. Develop the property with 5 or 6 house and call it good. I find it an absolute granting of special accommodation to Ivory Homes. The question is always who has the money and who has the clout in the city. I think we know. How many times has Ivory been into visit and request favors. How many times are they accommodated by the city. Has Chris been looking out for the people in the neighborhood I doubt it. Look at the expensive homes that are going up for sale that border this property. Has their property been devalued. It would be nice if that community would put in gates at both ends of there road and shut the development down. Private roads have that right.

It always comes down to the MONEY. They will make there money and walk away leaving the neighborhood to deal with the mess they have created. Well its up jumps the devil.

On Nov 29, 2021, at 4:47 PM, Echeverria, Daniel <[REDACTED]> wrote:

A small clarification on the below notice e-mail - The lots proposed along F Street (Lots 1 to 5) are proposed to be custom homes and so may or may not ultimately include an accessory dwelling unit. Each single-family home accessed from the internal private street (Lots 6 to 19) is proposed to include an internal accessory dwelling unit when built.

DANIEL ECHEVERRIA
Senior Planner
Planning Division

DEPARTMENT of COMMUNITY and NEIGHBORHOODS
SALT LAKE CITY CORPORATION

TEL [REDACTED]
EMAIL [REDACTED]

www.SLC.GOV/PLANNING
www.OurNeighborhoodsCAN.com

From: Echeverria, Daniel
Sent: Monday, November 29, 2021 3:59 PM
Subject: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division

Good afternoon,
You are being provided this update about the 675 N F Street development proposal as you have previously contacted the Salt Lake City Planning Division about the property owner's development proposal.

The property owner, Ivory Development, originally submitted a Zoning Map and Master Plan Amendment to the City in 2020. The applicant requested that the City pause processing those petitions

Subject: (EXTERNAL) Re: Public Hearing Notice - 675 N F Street Zoning and Master Plan Amendment
Date: Thursday, June 16, 2022 at 10:10:08 AM Mountain Daylight Time
From: Sallie Benedict
To: Echeverria, Daniel

The Planning Commission should NOT recommend any amendments to the existing zoning and density laws.

I realize that a builder looks at open space and wants to build. However, space is limited and this builder should play by the rules.

Ivory shows no respect for the current zoning and density laws when they keep coming back to the planning commission with the same request. The zoning laws are in place for a reason, and this builder shows complete disregard for the neighborhood it is impacting. I believe this builder will do anything and everything to get what they want. They certainly have the money and attorneys to wear down the process.

If Ivory is granted the amendment, there is no guarantee that they will even honor their word. Even worse, changing the zoning will open the door for an avalanche of similar requests. Then this neighborhood lives with your bad decision for years to come, and there will be nothing anyone can do.

My husband and I moved to Salt Lake City in 1994, and we have watched this neighborhood grow. Now the pressures of a growing population are felt everywhere, including the Avenues. High crime rates, traffic, and other issues are a big problem and will only get worse if you change the designation.

Please do your job and keep the current zoning and density laws in place.

Thank you for your consideration.

Sallie Benedict
Attorney at Law
712 E 12th Avenue
Salt Lake City, Utah 84103

On Fri, Jun 10, 2022 at 3:25 PM Echeverria, Daniel <[REDACTED]> wrote:

Good afternoon,

You are receiving this e-mail as you have previously contacted the Planning Division regarding the proposals for the 675 N F Street property.

Ivory Development is requesting to amend the zoning of the 675 N F Street property from the FR-3/12,000 "Foothills Residential District" to the SR-1 "Special Development Pattern Residential" zoning district. They are also requesting to amend the Avenues Community Master Plan designation for the property from "Very Low Density" to "Low Density."

The requested amendments are scheduled for Planning Commission consideration and a public hearing at the following date, time, and location:

Date: Wednesday, June 22

Subject: (EXTERNAL) No to Ivory Development

Date: Saturday, June 11, 2022 at 7:34:10 AM Mountain Daylight Time

From: Tom King

To: Echeverria, Daniel

Sir:

Please add my voice to those who have opposed the proposed Ivory Development on F Street. Such a project violates the very nature of the Avenues and the intent of the original zoning scheme it's residents relied on in selecting this unique neighbourhood to live in.

Thank you.

Tom King

Subject: (EXTERNAL) Re: Public Hearing Notice - 675 N F Street Zoning and Master Plan Amendment

Date: Friday, June 10, 2022 at 7:54:31 PM Mountain Daylight Time

From: Pamela King

To: Echeverria, Daniel

Please do not allow this Ivory development. Money should not rule. Neighbors already here ought have say so as to what happens to land. Notice that they start with one small request and then change it to a bigger request. We in the avenues are a fragile community not equipped for this type of huge dense development. It began small and became increasingly large over time. This bait and switch increase happened before to another development on 10th between E and F. They obscured views when it was promised they would not. Single family housing is the best plan in the avenues. Please think of the future. Thank you.

On Fri, Jun 10, 2022 at 15:25 Echeverria, Daniel <[REDACTED]> wrote:

Good afternoon,

You are receiving this e-mail as you have previously contacted the Planning Division regarding the proposals for the 675 N F Street property.

Ivory Development is requesting to amend the zoning of the 675 N F Street property from the FR-3/12,000 "Foothills Residential District" to the SR-1 "Special Development Pattern Residential" zoning district. They are also requesting to amend the Avenues Community Master Plan designation for the property from "Very Low Density" to "Low Density."

The requested amendments are scheduled for Planning Commission consideration and a public hearing at the following date, time, and location:

Date: Wednesday, June 22

Time: 5:30 PM

Location: City and County Building ([451 S State Street](#)) [Room 326](#), 3rd Floor

The Planning Commission is a recommending body for zoning map and master plan amendment requests. The final decision maker on the requests is the City Council.

The associated Planned Development and Subdivision requests will not be heard by the Commission at this meeting, but may be heard by the Commission at a later date.

The above public hearing will be held in-person, but anyone may also participate in the public hearing virtually if preferred. The full agenda and additional information on how to view the proceedings online and participate in the public hearing virtually are available on the Planning Commission webpage here: <https://bit.ly/slc-pc-agendas>

Subject: (EXTERNAL) No Ivory Homes Re-Zone - "Updated Plans" (March 10, 2022)

Date: Tuesday, May 10, 2022 at 9:40:28 AM Mountain Daylight Time

From: Natalie Shutt-Banks

To: Echeverria, Daniel

CC: Preserve Our Avenues Zoning Coalition

Dear Mr. Echeverria,

I am writing to oppose the proposed "updated" Re-Zone at 675 North F Street. I have several reasons for my opposition:

New reasons to oppose "updated plan"

1. 13' retaining walls! That will be a huge scar on the site and in the entire neighborhood. Why would we allow a few homes to do this? It is not as if this is an infrastructure project that will benefit the city as a whole. These types of variances ruin the character of a city and a neighborhood.
2. The new proposal really has not changed much. They still want to overdevelop the property for the zoning plan. Why bother with zoning if the person with the most money can just come along and wear down the city and concerned public to get their way?

Continued reasons to oppose "updated plan"

1. Existing home property values will decrease due to the increased traffic load. This is a very established neighborhood and I do not believe that existing homeowners should see a decrease in their property values so that the Ivory's can make an extra buck.
2. This does not provide the much needed affordable housing to the city that would warrant a variance in zoning.
3. The location of the proposed high density development is not in compliance with the city's 5 year housing plan that clearly states that high density developments need to be in walkable areas. The plan was an attempt to use best practices for sustainable urban development.
4. The site is eventually going to be utilized but a less dense development will be better for the existing wildlife and the current greenspace aesthetic in the area.

Feel free to contact me with any questions.

Sincerely,

Natalie Shutt-Banks
861 E. 1st Ave
SLC, Ut 84103
[REDACTED]

Subject: (EXTERNAL) RE: Letter Concerning Ivory Homes Boundary with Northpoint Estates - F Street Project
Date: Saturday, May 7, 2022 at 9:07:15 AM Mountain Daylight Time
From: Judy_Joel Daly_Deaton
To: Wharton, Chris
CC: Alan Hayes, Jim Bach, Jan McKinnon, Peter Wright, Echeverria, Daniel, Judy_Joel Daly_Deaton
Attachments: image005.png, image006.emz, image008.png, image001.png, Joel Letter Retaining wall 5-5-2022 to Daniel E. (4).docx

Good morning everyone,

My apologies, I had meant to send this correspondence to Chris Wharton and failed to do so. Therefore, I am resending it to everyone on the original message and Chris Wharton.

Thank you,

Joel Deaton
Chair, Northpoint HOA
[REDACTED]

From: Judy_Joel Daly_Deaton <[REDACTED]>
Sent: Friday, May 6, 2022 1:30 PM
To: Echeverria, Daniel <[REDACTED]>
Cc: Judy_Joel Daly_Deaton <[REDACTED]> Alan Hayes <[REDACTED]> Jim Bach
<[REDACTED]> Jan McKinnon <[REDACTED]> Peter Wright <[REDACTED]>
Subject: Letter Concerning Ivory Homes Boundary with Northpoint Estates - F Street Project

Joel L. Deaton
813 North Juniperpoint Drive
Salt Lake City, Utah 84103
May 5, 2022

Mr. Daniel Echeverria, Senior Planner
Salt Lake City Planning Division
[REDACTED]

Re: Ivory Homes Proposal to develop 675 North F Street

Dear Mr. Echeverria;

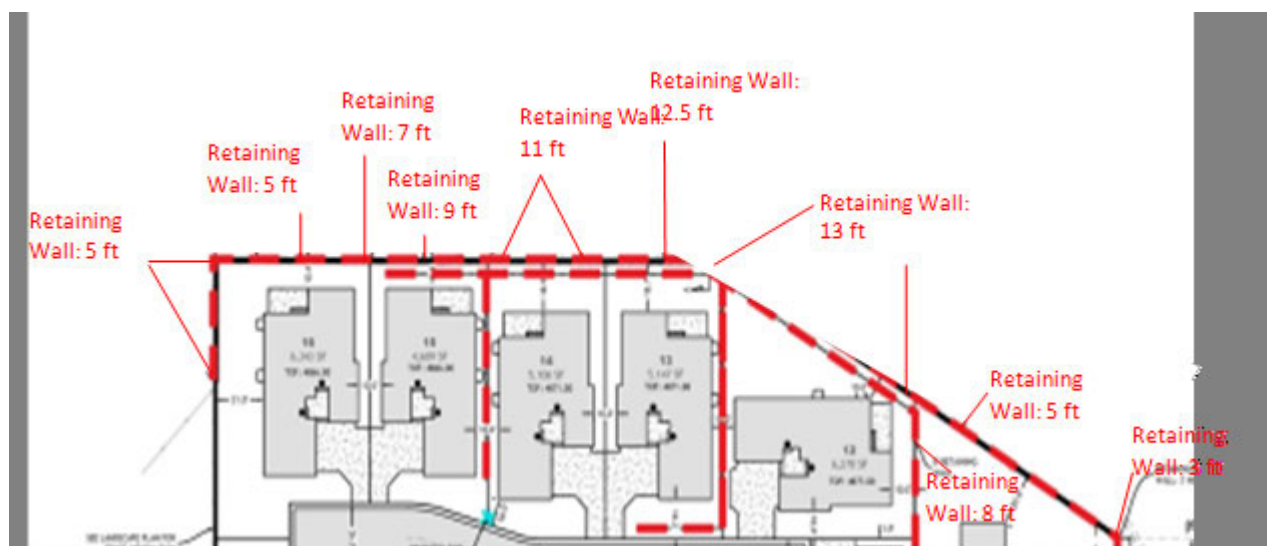
I write to you on behalf of Northpoint residents in my capacity as President of the Northpoint HOA. We have great concerns regarding the design of Ivory's proposed development in the section where it abuts Northpoint Estates.

Ivory's Plat Plan No.3 shows that Ivory proposes to reduce setbacks for four of the units

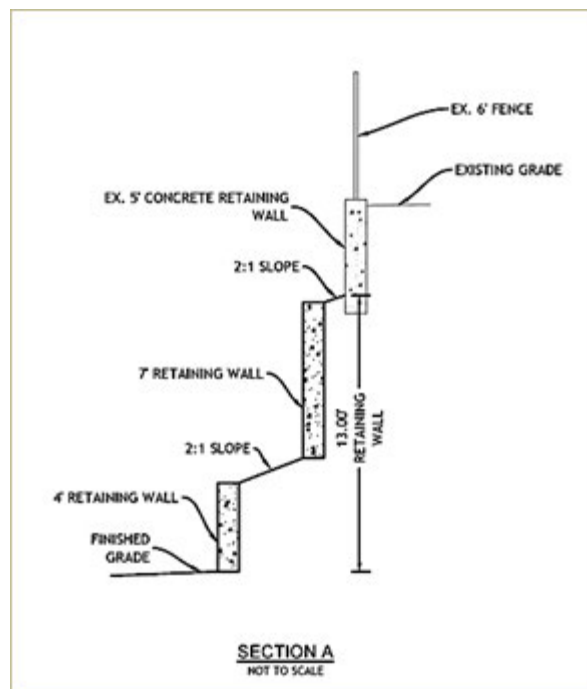
adjacent to the Northpoint boundary below those specified in the SR-1 regulations and put a large retaining wall system into these reduced setbacks, directly abutting our current boundary wall/fence combination. These reduced setbacks are shown in the table below. Rear yard setbacks are reduced from the required 22 to 25 ft to as little as 10 to 15 ft. This is unacceptable. The reduced setbacks bring Ivory's houses too close to Northpoint homes and the large tall retaining wall structure, which also does not conform to city standards, creates multiple problems.

We ask that Ivory do not be given any relaxation regarding setback regulations on this border with Northpoint and that any retaining walls be well back from our current boundary wall so as not to undermine and damage our property. Any retaining walls should also be constructed in compliance with city regulations concerning the design and construction of such retaining walls.

A photo of a portion of the Northpoint Estates retaining wall is shown below and Ivory's proposed design for this section of their development is also shown below with the retaining walls shown in red.



The cross section drawing shown below, from Ivory's plans, shows how Ivory proposes to construct extremely large retaining walls immediately adjacent to Northpoint's current boundary wall/fence combination.



Excavation for such a sizable retaining wall structure so close to Northpoints current 5 feet retaining wall and 6 feet fence combination risks undermining this structure, causing damage. **Our current retaining wall also supports Northpoint Drive, our only route of ingress and egress to Northpoint and we cannot risk this being compromised by Ivory.**

Setbacks

	<u>Setback</u>	<u>Ivory</u>	<u>Required</u>	
Unit 13	Rear Yard	15 ft	25 ft	25% of lot depth
Unit 14	Rear Yard	15 ft	25 ft	25% of lot depth
Unit 15	Rear Yard	10 ft	22.5 ft	25% of lot depth
Unit 16	Rear Yard	10 ft	25 ft	25% of lot depth

As can be seen from the above table, Ivory does not comply with the rear setback requirements for units, 13,14,15 & 16 with the deviations of 10 to 15 ft being highly significant.

Ivory's entire design for this development, requiring 1625 linear feet of large, tall, unsightly retaining walls, is flawed and unnecessary and should be rejected in its entirety.

The very least the city planning division and planning commission should do is ensure that setbacks around the periphery, including Northpoint, are respected.

Thank you,

Joel Deaton
President of the Northpoint HOA.

Subject: (EXTERNAL) Ivory Homes Rezone

Date: Friday, April 15, 2022 at 3:13:41 PM Mountain Daylight Time

From: Patricia Davis

To: Echeverria, Daniel

As many people have written about Ivory Home's rezoning attempts at Capitol Park Avenue, I would like the city to consider what happens when you ruin a neighborhood by changing its tenor too much. This rezoning will definitely change the tenor of the high aves.

Other areas such as 15th and 15th and 9th and 9th have made some efforts to maintain the ambiance of the neighborhood. However, they still have parking issues. Ivory Homes cannot possibly solve the parking issue, let alone the traffic in our neighborhood. There must be a better way to raise taxes if that is what the city wants. Also, this project is not about affordable housing. I urge the city to consider what the avenues' residents overwhelmingly want: no rezone for Ivory Homes.

Thank you

Patricia Davis

[REDACTED]

400 E Capitol Park Ave

UNIT 403

Salt Lake City, UT

84103

[REDACTED]

Subject: (EXTERNAL) Rezoning application for Lot 675 N. F Street, Salt Lake City, IVORY HOMES

Date: Friday, April 15, 2022 at 11:14:36 AM Mountain Daylight Time

From: Richard Schmidt

To: Echeverria, Daniel

CC: Nancy Schmidt

Dear Mr. Echeverria,

My wife and I are homeowners in the Capitol Park area 2 blocks from the site of Ivory Homes' proposed development of the lot at 675 N F Street, SLC. We understand that the Planning Committee will review, on April 27, the request for rezoning the lot to allow vastly higher density housing builds. We continue to be very strongly opposed to any rezoning of that lot, as are an enormous majority of those in this neighborhood community. I have previously detailed to you in emails the specific bases for our objection to this development and refer you to those attached documents. In short, building the number of homes and ADUs that Ivory proposes at that site will completely overwhelm the hilly and narrow street system in that part of the Avenues leading to unsafe, unhealthy and undesirable conditions. There are no reasonable transportation alternatives in that part of the city and Ivory has no solution for this concern other than our perception of "Its not our problem". Well, if the Ivory development is kept within the limits of current zoning rules, then the problem won't occur. This potential traffic problem thus very much indeed is a problem of their own creation.

Maintaining the current zoning in this neighbor hood is critical to sustaining the safety and qualities of this area, and must be preserved to keep Ivory Homes from building a disaster and infringing on the lives and properties of those already residing here.

Sincerely,

Richard H. Schmidt Nancy F. Schmidt
344 E. Charity Cove
Salt Lake City, UT 84103

Sent from [Mail](#) for Windows

From: Richard Schmidt

Sent: Sunday, December 26, 2021 3:35:42 PM

To: [REDACTED] <[REDACTED]>

Subject: Rezoning application for Lot 675 N. F Street, Salt Lake City

Dear Mr. Echeverria,

Ivory Homes has now presented some revisions of their development plans for their lot at 675 N F Street, SLC. I have reviewed their revisions and continue to be strongly against their request for rezoning on this lot. I am copying for you below my original letter to you in regard to their initial application. All of the issues that I raised in that letter are still unresolved issues with Ivory's latest plan. In short, they are putting too many residences on a lot in an area that cannot handle that type of development density. This area is too far removed from walkable city amenities to offer any advantage for high density development, nor is there sufficient public transportation to mitigate this. The streets are narrow and hilly in this neighborhood so it is

not suitable for pedestrian or even bicycle access to downtown, and the increased motorcar traffic will create both a mess and a hazard to all the surrounding residents and their children.

Simply stated, this development does not belong here.

I hope that the city council will unreservedly vote against any rezoning application and maintain the current zoning status.

Thank you for bringing these issues to the City Council

Sincerely,

Richard H. Schmidt
344 E. Charity Cv, Salt Lake City
[REDACTED]

[Copy of previous letter follows:]

Re: Rezoning application for Lot 675 N. F Street, Salt Lake City

Dear Mr. Echeverria,

I live in the neighborhood that will be impacted by the proposed rezoning for the property located in the upper avenues at the corner of F Street and Capital Park. I am writing to express my vehement opposition to the rezoning request by Ivory Homes to allow high density urban development in an area that is really suited only for its current suburban FR-3 designation. I base my opposition on the following points.

The Ivory proposal is entirely out of character for the location. Unlike areas that are far more appropriate for a high density urban development, there are no walkable commercial services, stores or restaurants in the vicinity, and bus routes are limited to a single line about 1/3 mile away with no evening or night service.

The large number of new residences in this development would thus bring vastly increased traffic to an area that has mostly cul de sacs and few through roads. The roads themselves are narrower than ordinary Salt Lake City standards. Maintenance of the roads in the Capital Park area and their underground utilities are the responsibility of our local HOA, and it is beyond fairness to burden our community with the unnecessary and ill-conceived overload that this development would bring. The narrower than standard streets already has raised concerns that access for emergency service vehicles may not be sufficient, and this development vastly aggravates that situation. Since the development doesn't adequately provision for visitor parking, this road situation will be made even more critical.

Lastly, such a high density development is just not necessary to make for commercially successful use of the property in this area. This is a desirable residential area and I see no reason that Ivory or whoever develops the lot cannot do so viably under its current zoning designation. This would significantly reduce the problems that the higher density development would inevitably cause, and prevent a huge negative impact to the surrounding community.

I trust that you and the planning commission will carefully consider these points, and the fact that because of these issues, there is overwhelming and justified community opposition to the Ivory development and the proposed rezoning.

Sincerely,

Richard H. Schmidt, 344 Charity Cv, Salt Lake City



Subject: (EXTERNAL) NOZONE REZONE

Date: Thursday, April 14, 2022 at 8:54:16 PM Mountain Daylight Time

From: Henry

To: Echeverria, Daniel

CC: Preserve Our Avenues Zoning Coalition

Daniel Echeverria,

I have reviewed Ivory's revised proposal and I continue to remain opposed to the rezoning. I live across the street from the plot Ivory homes wants to rezone. I am against the increased amount of lots and ADU's that they propose. It is a very dense plan for the size of the plot and Capitol Park Avenue is a very narrow road for all of the residents to share. It is a private road that the city does not want to maintain. We know already that fire trucks have a hard time turning around and navigating our area. Ivory homes says that this housing is going to be affordable and I do not feel that 800K and above is affordable. There will also be a considerable amount of retaining walls to support the 33 homes and ADU's. Ivory themselves has stated that this is unsitely and it is. Why do they need to put so many residences in this plot? The original allotment 11 homes seems like a more practical plan for the amount of space there is. Please listen to our community as we are the ones who have to live with the decision.

Sincerely,
Annegrey Scott
(Resident of the Meridien)

Sent from my iPad

Subject: (EXTERNAL) No to Ivory Rezone

Date: Wednesday, April 13, 2022 at 5:31:13 PM Mountain Daylight Time

From: Amber Skolnick

To: Echeverria, Daniel

CC: Preserve Our Avenues Zoning Coalition

Daniel Echeverria,

I am writing this email to say that I oppose the rezone proposed by Ivory Homes in the upper avenues. I have lived in the Avenues for 25 years and I have lived across the street from the plot in question for 4 years. The number of homes Ivory wants concerns me especially with the ADU's involved. Capitol Park Avenue is a very narrow road and 33 residences will bring a lot of traffic. The rezoning plan is very dense compared to the rest of our neighborhood.

They want to cluster so many homes in that would require many retaining walls and leave very little green space. Ivory homes says these will be affordable home and I do not think one million dollars is very affordable. I understand that this land is for sale, but I do not think that a developer should be able to come in and almost triple the original zoning without care to what the neighborhood thinks. Please consider the way our community feels about the rezone since we are the ones who have to live with this.

Thank you,

Amber Skolnick

400 E Capitol Park Ave, Unit 503

Subject: (EXTERNAL) No Ivory Homes Re-zone

Date: Wednesday, April 13, 2022 at 10:15:54 AM Mountain Daylight Time

From: Jill Kinney

To: Echeverria, Daniel

CC: Preserve Our Avenues Zoning Coalition

Daniel Echeverria
Senior Planner
SLC Planning Division

RE: Proposal to Re-Zone 675 N. F Street, SLC

Mr. Echeverria:

How many times and in how many different ways can we say the same thing? Please review all of the previous letters submitted by the residents of The Avenues regarding Ivory's desire to rezone 675 North F Street. Ivory is still trying to jam too many dwellings onto this 3.2-acre lot. The facts remain the same — this is not the right property for what they want to do.

Respectfully,

Jill Kinney
461 E 13th Avenue
SLC, UT 84103

OPPOSITION TO IVORY HOMES REZONING APPLICATION AT 675 NORTH F STREET

Mr. Daniel Echeverria, Senior Planner
Salt Lake City Planning Division
daniel.echeverria@slcgov.com

Dear Mr. Echeverria,

This is the fourth letter I have written in opposition to the proposed zoning change. After four or five resubmissions Ivory has still not resolved the inherent problems of building on a parcel of land that is not suitable for the type and number of structures they want to build.

Ivory still plans to scar the hillside with multiple tiered terraces to create room for an excessive number of very large million-dollar homes. They plan to do this by building tall retaining walls within a few feet of their neighbor Northpoint Estate's only road entering and leaving Northpoint property. I feel this is an unwarranted and unnecessary risk to place upon the 49 households in this 40-year-old project. Northpoint's road could be compromised immediately or over time by Ivory's unwise decision. I am sure that everyone is aware that an earthquake fault lies only blocks from the target property. Insurance companies are aware as evidenced by the fact that only a couple insurance companies offer earthquake insurance in this area and rates have doubled in the last year.

Ivory is asking for major concessions from Salt Lake City, which will in the end, accomplish nothing for City. This vague proposal has numerous other problems such as more, not less, cars and traffic. There is very little room allocated for guest parking or snow removal. The main entrance into the Ivory project is on a narrow privately owned road that does not allow street parking.

I have read the purpose statement and general provisions of the proposed rezoning. Walking distance to shopping, dining, employment and other daily needs are clearly not possible at this property location. Bus service is infrequent and does not include evenings or weekends. It must be remembered that distance is not the only impediment to walking in the Upper Avenues. The streets are very steep. I would invite anyone to walk from Smith's on 6th Avenue up to Capital Park Avenue; it is a steep, arduous climb.

I have also read Ivory's second proposal for the property. There are many misleading and inaccurate statements, so I will only mention a few.

For example, a professor from the U wrote nine pages supporting Ivory. His proposal assumes that an individual who pays a \$1,000,000 or more for a home is a logical and ready source for renting part of their property. He also mentions "aging in place" and transit accessibility, plus proximity to services. The professor must not have visited the property, because if he had he would quickly realize there is not walkable availability to shopping, groceries, and medical services, etc. nearby.

Similarly, the UCAIR letter in support of Ivory also refers to “Placing housing, transportation and job or educational opportunities closer together results in more walking and biking, more transit use and, as a result, fewer vehicle trips.” This leads to cleaner air. This comment must have been plucked from a previous stock file of recommendation letters. As mentioned above this neighborhood is not walkable other than for exercise or recreation. Public transportation is very limited.

The proposed rezoning is for totally different property characteristics than 675 North F Street. Ivory appears to be trying to put a square peg in a round hole in order to make more money at the expense of the existing neighborhood. In fact, all of what they say they want could be accomplished under current zoning, which would be eleven units and eleven ADUs. At a Greater Avenues Council Meeting a representative of Ivory said they could make more profit staying within the current zoning. A strange comment in light of their proposal.

I feel the current zoning, allowing for 11 units plus 11 ADUs more accurately fits the reality and livability of this property’s location at 675 North F Street. Zoning regulations have a purpose for the long-term viability of neighborhoods and should not be changed to suit a single entity’s desire or profit motivation.

Thank you for your consideration,

Bruce Johnson

849 N Juniperpoint Drive
Salt Lake City, UT 84103
801-533-2249
BJohnson849@comcast.net

Cc:

Mayor Erin Mendenhall
Chris Wharton District 3 City Council
Preserve Our Avenues Zoning Coalition

mayor@slcgov.com
chris.wharton@slcgov.com
POAZCoalition@gmail.com

Subject: (EXTERNAL) Planning Commission - Ivory Homes Application

Date: Monday, April 11, 2022 at 6:26:19 PM Mountain Daylight Time

From: [REDACTED]

To: Echeverria, Daniel

CC: [REDACTED] Mayor, Wharton, Chris

Dear Planning Commission,

I live on H Street, two blocks from the Ivory Homes development property. As a retired landscape architect, I look at their proposed plans for appropriateness of grading, drainage, retaining, circulation, views, and quality of outdoor space.

While the applicant's site plan might work well on flat land, imposing it on a site that slopes 50 feet diagonally across the property creates inherent problems, which are compounded by site design decisions that contribute to zoning non-conformance.

The arrangement of multi-gen units, set in mirrored pairs with the same floor elevations, carves the site into large flatish terraces with tall retaining walls on multiples sides of the units. Units 13-16 run lengthwise "against the grain" of the slope rather than with the hillside, requiring excessive retaining at the rear of the property. Both of these features are very different from the typical Avenues treatment of slope where homes align parallel to and step with the topography.

These problems are compounded by excessive density in the applicant's plans, causing non-compliance with SR-1 zoning regulations in multiple areas, including lot size, lot width, yard setbacks, building coverage, and garage orientation, suggesting that the application is looking for maximum density and profit rather than designing a project to fit this specific site. These are self-inflicted failures, resulting in a development with convoluted circulation, non-compliant setbacks, insufficient space between units for privacy or grade transitions, tall retaining walls as the dominant visual feature of the development, and density, character, and appearance very different from the rest of the Avenues.

Ivory Homes has done little in their multiple applications to meet SR-1 zoning requirements, choosing instead to seek exemptions through Planned Development (PD) designation. It could be argued that the applicant is requesting a Planned Development only in order to circumvent SR-1 regulations, even though PDs are, by code, "not intended to be a means to simply obtain variances from zoning regulations" and "should result in a more enhanced product than would be achievable through the strict application of land use regulations . . ."

If the SR-1 rezone is granted, the City should mandate that the applicant's plans meet the zone's requirements in all respects. This could easily be done by reducing the number of units so that each meets zone regulations for lot size and width, yard setbacks, and building coverage. Units should then be redesigned to meet SR-1 regulations for building height and standards for attached garages, and rearranged on the site to reduce grading impacts and retaining wall heights and extent. These site plan modifications would help the development match the scale and intensity of adjacent neighborhoods and preserve the existing character

of the Avenues.

For the above reasons, I respectfully request the Planning Commission deny Ivory's request for a Planned Development and the City rigorously enforce compliance with SR-1 zone requirements. That, in the long term, is in the best interest of Salt Lake City.

Thank you,
James Bach
655 North H Street
SLC, UT 84103

Subject: (EXTERNAL) Ivory Development

Date: Monday, April 11, 2022 at 3:22:02 PM Mountain Daylight Time

From: Maria Mastakas

To: Echeverria, Daniel

Hi Daniel,

I think this is the fourth of fifth letter that I am writing opposing Ivory's overly dense zoning change. The new plans do nothing to address the issue of affordable housing, in fact all of their proposals do the opposite. This will drive prices up in the area giving the homes are going to be priced at over a million and will be used as comps for the neighborhood. Ivory is the only group that will profit from a zoning change.

Thanks,
Maria

Subject: (EXTERNAL) Ivory Homes / Avenues Master Plan

Date: Thursday, April 7, 2022 at 3:33:52 PM Mountain Daylight Time

From: Lance Holter

To: Echeverria, Daniel

CC: Lance Holter

Daniel Echeverria,

I am writing to protest the proposed Ivory Homes project at Capitol Park Ave. and 4th street in the Avenues, SLC. The request to change the zoning to allow 33 residences from the allowed 11 single family homes is unconscionable and greedy.

The combination of tall retaining walls and dense and overwhelming large buildings is not acceptable in a community and historical neighborhood like the Avenues. Simply put, why can't Ivory homes be satisfied with 11 single family residences that the current zoning of FR-3 would allow?

The design of the project is flawed to the extent they will require a variance for the grading problems they will create in the first place. This design presents visual nuisances with their overly large retaining walls and grading step ups. This also creates overly tall building heights and further is not compatible to the Historic Avenues Neighborhood Master Plan.

Why is it necessary to overbuild on this parcel, eliminating valuable green space and reducing setbacks ? Why is it necessary to build a project which is incompatible with the neighborhood? Why is it necessary to drastically increase the area's traffic and parking problems from residents and visitors to this proposed project? Why is it necessary to accept the construction of long retaining walls as high as 13' in a Historic Neighborhood? Why can't Ivory Homes come back with a plan that meets the idea for compatibility with the Avenues Community and Neighborhood?

There is nothing wrong with providing a plan for thoughtful development , a development project that fits in with its neighborhood and conforms to existing Zoning rules, a plan that considers the environment and preserves open space and habitat. A plan that does not burden the associated neighborhood with traffic, parking problems, snow removal management and proper grading and run off control using best management practices. This idea of an out of control massively dense project behind giant tall concrete walls and using excessive grading and retaining walls is not compatible with the neighborhood.

For these reasons I protest this development and hope you will properly consider the project and leave the zoning as is which will allow 11 single family homes and possibly ADU's of an appropriate size with adequate off street parking.

Thank you for your consideration.

Lance Holter
627 N H st.
SLC, Ut 84103

Sent from my iPad

Subject: (EXTERNAL) Opposition to Rezoning in the Avenues

Date: Thursday, April 7, 2022 at 8:05:32 AM Mountain Daylight Time

From: Cindy van Klaveren

To: Echeverria, Daniel

April 7, 2022

Mr. Echeverria,

As an 11-year resident of Northpoint Condominiums, I would like to respond to the request by Ivory Homes for rezoning, as well as the revised building plan for 675 N. "F" Street.

In the revised plan, the sidewalks on "F" Street and the setbacks on Capital Park Avenue are nice improvements. However, the remainder of the plan looks so much like the first proposal that I struggled to find meaningful changes. I see that there will be a few less homes, but the second plan still calls for very small homes, no play areas, insufficient parking, and perhaps 70 + additional cars pouring down upon already overcrowded Avenue streets. The north side dwellings look to be planned almost touching the property line.

There is no shortage of demand for more housing for growing families in our area. However, these small "cottages", (Ivory's own descriptor), would not attract those growing families. Families need space. These are too small in size to afford any privacy. There is no outdoor play space. There are no playgrounds in close proximity. This plan shows dense, overcrowded units, not in keeping with the surrounding developments. Cottages are fine for a holiday weekend, but not for raising families.

I remain hopeful that the current zoning will be upheld by those who make these important decisions. The current zoning would allow 11 homes which could each contain an ADU for a total of 22 dwellings. Those homes could be of a size that would attract growing families and help provide some added stability to our neighborhood school.

The current zoning allows 22 dwellings. This revised plan shows 35 dwellings. My hope is that Ivory could redesign their plan and eliminate the extra 13 dwellings. A plan that supports the current zoning standards would have my support. I am looking forward to thoughtful, zoning-compliant, responsible development of this lot.

Incidentally, Ivory has now erected "For Sale" signage, depicting these diminutive dwellings which are in violation of current zoning. This is just one example of Ivory's complete disrespect for current zoning laws as well as a display of unflattering arrogance. Ivory is proceeding as if current zoning laws are not applied equally to all. Please dispel that type of thinking.

Sincerely,

Cindy van Klaveren, M.Ed.

843 N. Grandridge Court

Northpoint Estates Condominiums

Salt Lake City, UT. 84103

Cynthia van Klaveren, M.Ed.
Adjunct Instructor, ESL



Subject: (EXTERNAL) Comments on the Upper Avenues Ivory Homes Development Proposal

Date: Wednesday, April 6, 2022 at 9:04:39 AM Mountain Daylight Time

From: Beth Chardack

To: Echeverria, Daniel

I am resending my comments from before, which are still relevant to the new Ivory Homes proposal, since Ivory has not responded appropriately to public outcry and continue to ignore existing zoning codes which are there to protect the integrity of our neighborhoods.

Mr. Echeverria,

I am submitting these comments in **strong opposition** to the proposed Ivory Homes housing development in the upper Avenues. I have visited the site, reviewed the project, read the current zoning language, as well as that of the proposed zoning. I fully support the concept of ADUs, and have studied how they have been done effectively in other cities around the country. The many benefits of ADUs, as they were designed, can be realized as the costs of increased density are dispersed around cities, allowing the impact to be dissipated and absorbed over a large area. The Ivory Homes plan, which proposes 20 ADUs on this one parcel of land, is not consistent with any norm that I have seen.

It is my belief that Ivory Homes is bastardizing the concept of the ADU, by calling the extra units they are hoping to build 'ADUs', instead of simply calling it what it is: higher density housing. The reality is that in being a part of new construction, by definition they are not accessory. They are in fact new construction, and should be treated as new construction in terms of zoning and Masterplan compatibility. It feels like this change in nomenclature is a guise so Ivory Homes can maximize profit with disregard to the consideration of carefully thought out plans and regulations put in place years ago by professional urban planners and meant to protect homeowners and neighborhoods from this very situation. Let's let these documents preserve our neighborhoods.

The purpose of the Foothills Residential Zoning designation is to preserve the integrity of the Masterplan for this area. High density urban zoning does not belong in the upper Avenues, and our Masterplan exists to uphold that vision and continuity of the neighborhood. Changing the Masterplan, by request of Ivory Homes, at the expense of the quality of the neighborhood is wrong. This kind of high-density development belongs in more urban areas, such as downtown or Sugarhouse. The proposed zoning of FB-UN1 is inappropriate for the upper Avenues and if allowed, would set a dangerous precedent for building in the Avenues and would invite other similar zoning changes. The Masterplan exists to preserve our neighborhoods and needs to be kept intact.

It is my understanding that one of the reasons Ivory Homes is calling the extra units 'ADU' is because they say those units will provide more affordable housing in the Avenues. I also understand that the lowest price for one of these Ivory Homes ADUs will be \$800,000 (unconfirmed), which is far from qualifying as 'affordable' in Salt Lake City. Ivory Homes is trying to get permission for higher density development claiming to be providing Affordable Dwelling Units, when that is just not the case.

Building 45 residences in a space zoned for eleven has quite a large impact on the neighborhood, with the developer offering no mitigation efforts that I can find to offset increased traffic, an estimated addition of ninety cars. Note that accessibility to public transportation is minimal in the upper Avenues, and the negative impact to traffic and air pollution should be considered. This is another reason to reject the project.

The Ivory Homes plan fails to keep their design consistent with neighboring properties in terms of setbacks, open space, and sidewalks. Their proposed plan has buildings covering the entire site to the maximum square footage allowed under their proposed zoning, without allowing for consistency with the Avenues 'green feel'. This is an urban design that belongs downtown, where people want the amenities that come with denser living. It is inappropriate in a suburban location such as the upper Avenues.

I urge the Planning Commission to keep our zoning and Masterplan intact, and reject the high-density housing proposal by Ivory Homes. Their proposal would have a large negative impact, without providing benefit to the neighborhood. This site is zoned for eleven homes, and that is the maximum that should be allowed on this site.

Thank you.

Beth Chardack
BA, Political Science, University of Michigan
MA, Urban and Regional Planning, George Washington University
MA, Public Administration, University of Utah

563 Cambridge Cir

Salt Lake City, UT 84103



Subject: (EXTERNAL) Ivory homes no redone

Date: Tuesday, April 5, 2022 at 8:04:42 PM Mountain Daylight Time

From: Ann Marie Leone

To: Echeverria, Daniel

I'm writing to express my concerns on the proposed ivory homes rezoning plans. With the amount of units and the tearing down of trees with hawks nesting, and the potential harm it would have if a fire were to break out and the fire department could not accommodate the needs of the neighborhood, I implore you to please shut this down once and for all. It's obvious, ivory homes is greedy and they are not considering the needs and wants of a community that has been intact and in agreement for several years. They paid a hefty price for the land, they want to disrupt the lives of so many homeowners in the community so they can profit greatly from this obscene proposal. This is not the place or time for greed in our neighborhood. Please, shut this down. It's been two years of fighting and negotiations and it's clear and apparent that nobody wants this development with the rezoning but Ivory. Please save us from this dire situation. It's beyond ridiculous and exhausting. Everyone has a right to purchase land and develop, but this is egregious and needs to stop once and for all.

Ann Marie Leone

Sent from my iPhone

Subject: (EXTERNAL) Ivory Homes Rezoning Request

Date: Tuesday, April 5, 2022 at 6:55:50 PM Mountain Daylight Time

From: Julia Rossi

To: Echeverria, Daniel

CC: Preserve Our Avenues Zoning Coalition

Dear Mr. Echeverria

I am a long time resident of the Avenues. Zoning laws exist to address the need for balance between competing entities (residential, commercial, industrial, agricultural, etc.). They protect existing property from devaluation and support preservation of historical structures. They ensure access to necessary infrastructure and services as well as promote safety. Control of zoning is typically assigned to the City Council. The City Council is charged with representing the needs of the community. It is an excellent example of government by the people and for the people.

There is nothing wrong with our current zoning laws. There is no reason to change them. Our zoning laws represent the wishes of our community. If members of our community want to change the zoning laws it would be imperative that they convince a majority of their fellow community members to ask for changes. Our zoning laws are not in place to serve real estate companies, developers, or businesses requesting changes for the sole purpose of increasing their personal profits. They should not be the deciders for our community.

We rightfully expect our City Council to represent us. We are your voters. We are not only asking you to do what is right, we are expecting you to do what is right. Maintain our current zoning laws.

Sincerely,

Julia A Rossi

Subject: (EXTERNAL) Oppose the Rezone Avenues

Date: Tuesday, April 5, 2022 at 6:22:01 PM Mountain Daylight Time

From: Carli Whitehead

To: Echeverria, Daniel

Hi Daniel,

My name is Carli. My husband and I live on 8th avenue in the Avenues with our two elementary-school aged children. I'm writing to let you know we strongly oppose the rezone proposed by Ivory Homes.

Thank you,
Carli Whithead

TO: Daniel Echeverria, Senior Planner, SLC Planning Division

daniel.echeverria@slcgov.com

RE: 675 F Street SLC Avenues, re-zoning

DE: 04/04/2022

Dear Mr. Echeverria,

The Avenues is a suburban residential neighborhood, already supplementing nonresidential hiking and biking traffic year-round. Rezoning would further stress the bordering environmentally sensitive foothills. And, of course immediate recreational opportunity is a selling point for Ivory Homes; thus, decreasing housing affordability. The F Street lot is not a location that fits the city's housing goals as Ivory Homes states.

The continued Ivory Homes rezoning applications, are an attempt to continually maximize the most ADU houses, even with building walls to flatten the hills. The 675 F Street lot is already zoned with the future in mind. Adding an ADU with additional parking and its own entrance is not a single-family home. Make a final, decisive vote to maintain the current zoning. Quit allowing Ivory Homes to berate the zoning law. Let them get started on building their FR-3 zoned homes. They will still make a profit and keep the integrity of the Avenues.

If Ivory Homes receives a rezone, traffic congestion will greatly increase. Let's look at recent history. Rezoning would increase Bonneville Blvd traffic for those driving North. Bonneville Blvd has already been changed to a one-way corridor for North bound I-15 traffic to safely accommodate increased foot & bike needs and 'decrease congestion' in the Avenues.

This historic unidirectional vehicle change on Bonneville Blvd has increased traffic congestion downtown by requiring South bound I-15 denizens to enter the Avenues via 2nd Ave. The lower Avenues' traffic wanting to turn onto State Street from 2nd Ave. is very congested and painful. Since the East bound 2nd Ave. left turn lane was closed to decrease traffic congestion heading uphill, traffic backs-up to the State Street light during the evening rush hour.

Rezoning would unreasonably increase traffic on the feeder streets to Capital Park Avenue. The unreasonable increase in population would further stress use of hiking, biking and open areas accessible only through the Avenues. Rezoning would further increase utility demands and service vehicle traffic. Rezoning would further increase unfavorable issues of urbanization; and the Avenues would lose its quintessence. The Avenues is a suburban neighborhood where we all interconnect with our neighbors and help each other.

If Ivory Homes receives rezoning, there is no justification for not allowing other rezoning in the Avenues. Thanks to Ivory Homes for revising the conceptual 'Plan' and supporting documentation but these documents are not contractual, but would open up urbanizing.

We wish to present this, our public opinion to disapprove of Ivory Homes or any other contractor's request to rezone the 675 F Street lot.

Sincerely,

Peter R Morris & Lori A Morris, residents and owners

330 C Street

Petermorris330@gmail.com

801-664-8780

Subject: (EXTERNAL) Ivory Homes Rezone

Date: Tuesday, April 5, 2022 at 4:37:50 PM Mountain Daylight Time

From: Terry Becker

To: Echeverria, Daniel

CC: Preserve Our Avenues Zoning Coalition

My name is Terry Becker and I live at 1500 Tomahawk Dr. Having been a member of GACC for 40 years and having served as president in the 1980's, and was a member of the City Planning Commission in the 90's, I've seen how some developers work around ordinances and masterplans, with the help of city planners, before community councils are even informed. Look at all the building on the University of Utah campus, which is state run. Neighborhoods haven't a say in its impact and the pressure placed on them.

The plan to rezone as proposed by Ivory Homes places an extreme burden on all of us. Changes will occur, Ivory and new home owners will petition for special exceptions, variances to codes, traffic will increase, there will be stress on utilities, and evacuation should fire occur will become dangerous and views will be impacted. Please, register my vote! To Rezone anything of this magnitude in the foothills, is wrong. I vote NO!

Please place this letter in the new “batch” of letters in opposition to the Ivory Homes rezone. Nothing new submitted to rezone can improve their application...Terry Becker

Subject: (EXTERNAL) NO to Ivory Homes Rezone

Date: Tuesday, April 5, 2022 at 3:48:45 PM Mountain Daylight Time

From: Sophia Malik

To: Echeverria, Daniel

CC: Preserve Our Avenues Zoning Coalition

My name is Sophia Malik and I reside at 220 E 8th Ave, Salt Lake City, UT 84103. I strongly oppose the proposed rezone of 675 North F Street by Ivory Homes. This rezoning will destroy the eclectic history of the Avenues neighborhood and pave the way for future unwanted development in the area which will continue to be opposed by longtime residents. Thank you.

Sophia Malik

Subject: (EXTERNAL) I strongly oppose Ivory Homes' 4th rezone proposal. This is still not good for the Avenues.

Date: Tuesday, April 5, 2022 at 2:46:35 PM Mountain Daylight Time

From: Rick Gamble

To: Echeverria, Daniel

CC: Wharton, Chris

Here are my reasons:

My wife and I are long-time residents of the Avenues. We strongly object to Ivory Homes' request for rezoning at the property located at 675 N 'F' Street. Their proposed development is not suitable for the Avenues. The intent of allowing ADUs to exist was to provide help for individual homeowners who felt the need. The intent was NOT to help a developer make more money on less land. Ivory's rezone request is altogether too dense for this location.

As you are well aware, zoning regulations exist for a reason. If zoning regulations can be changed whenever a developer wants to change them, what good are they? If the proposed changes were for the good of the community, maybe that would be a reason to approve a rezone. Well, in this case, the rezone is definitely not for the good of the community. This is totally obvious if you look at the results of past votes taken by the Greater Avenues Community Council (GACC) [1244 to 25 against rezoning]. The rezone would only be for the good of Ivory Homes, so they could squeeze more money out of their intended project.

We are concerned about growing traffic on our Avenues streets. These streets were designed and built many years ago. They were not built for heavy usage. They already present risks at 4-way corners. So much additional traffic from the proposed over-populated cottages would exacerbate the dangers. Then, because we are at a higher elevation than most parts of Salt Lake City, the risks get even worse on snowy or icy days. In addition, we are an active neighborhood, with many walkers and cyclists. Please notice our attempts at "traffic calming." We don't need more traffic to add more danger for pedestrians!!!!

Ivory's request is not compatible with the ambiance of our neighborhood. Two of the aspects we most love about the Avenues are the relative quiet of the neighborhoods and the presence of older, individually-built homes, each with their own unique characteristics. These proposed homes do not align with that vision. According to Ivory's plans, there will be minimal setback and minimal greenspace. There are even a number of lovely mature trees that would be removed. That's bad for wildlife, bad for aesthetics, bad for our quality of life, and not suitable for the Avenues.

In summary, Ivory Homes' request for a rezone at 675 N 'F' Street lacks a logical basis for approval. Please do the right thing and do not approve the request.

Respectfully submitted,

Rick Gamble

929 N Terrace Hills Dr

SLC UT 84103

Subject: (EXTERNAL) Re: 675 N F Street Public Notice - Capitol Park Cottages - SLC Planning Division
Date: Tuesday, April 5, 2022 at 1:32:34 PM Mountain Daylight Time
From: Nathan Dean
To: Echeverria, Daniel
CC: Peter Wright, Jan McKinnon, Linda Dean ([REDACTED])
Attachments: Planning commission 04.05.22.docx

Mr. Echeverria,

Please see my new attached letter opposing the latest Ivory submission for rezoning 675 F Street in the high avenues of Salt Lake City.

Sincerely, Nathan Dean

400 East Capitol Park Ave Unit 303
Salt Lake City, Utah

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675 F street Zoning

Mr. Echeverria,

April 5, 2022

I am a pulmonary physician at Intermountain Medical Center and the University of Utah. My group has published research linking Wasatch Front air pollution with increased rate, severity, and deaths from pneumonia.

Mayor Mendenhall said: "We can and must take aggressive actions to end the epidemic of emissions in the Salt Lake Valley, not only to improve the quality of the air here, but to slow and lessen the impacts of climate change worldwide." Salt Lake City's air pollution increases the rates of lung cancer and heart attacks, and aggravates asthma, COPD, and other lung diseases. During winter inversions and the summer fire season our levels of particulate pollution can be the highest in the United States.

Packing 20 homes and 15 ADUs into the F street lot will add 70 new cars and trucks, to be driven 100,000 times per year and produce emissions that will worsen air quality in our neighborhood and city. F street is too steep for walking or cycling except for people who are vigorously exercising, not carrying groceries or traveling to work or school. The nearest bus to downtown stops at LDS Hospital, more than 4 steep blocks from the property and runs every 30 to 60 minutes. Residents of the property will rely almost exclusively on private cars.

This proposal does not provide housing close to jobs, schools, and services and will increase rather than reduce greenhouse gas emissions and fossil fuel consumption. Ivory plans to cut down 90 year old trees planted on VA hospital grounds that currently transform CO₂ into oxygen and a safe nest for red tail hawks every spring.

To conclude, Ivory's proposal will considerably worsen Avenues and Salt Lake City air quality, as well as worsening climate change. The latest small tweaks to Ivory's plans do not resolve any of the above issues. No proposal that requires a zoning change is acceptable for developing the F Street lot.

Sincerely, Nathan Dean

400 East Capitol Park Ave Unit 303 - Salt Lake City, Utah

Subject: (EXTERNAL) Fort Ivory

Date: Monday, April 4, 2022 at 5:30:43 PM Mountain Daylight Time

From: Mona Marler

To: Echeverria, Daniel

Greetings Daniel,

As an Avenues resident, I am writing to express my high level of disagreement to this proposed project. Throughout the process, I have continued to ask myself several questions;

- What is the benefit of this project to the community?
- Why would the city entertain the idea of changing the current zoning, in a historical neighborhood, that currently has strict building guidelines that protect the historical aspects of this neighborhood?

Please tell me why this would be allowed, when the neighborhood has fought so hard to preserve the character of the area. Please don't tell me it's to provide affordable housing, as this plan demonstrates based on the proposed design that these homes will be expensive and the ADU won't be affordable either. This is a boondoggle for Ivory Homes, to profit at the expense of the current residents. The current residents in the area deserve better, they built and bought their homes under the current zoning, and should not be at the mercy of a greedy developer, who isn't willing to give any concessions to preserve the area. Every time they come back with an updated proposal nothing really changes.

The last revision of the plan does not demonstrate good will to actually work with the neighborhood. Although, they would like to present themselves as working with the commission they have in fact presented NOTHING NEW. Their 10th submission demonstrates this fact.

- Their intent is to create large retaining walls, in order to increase their building pad. This is not within the character of that area, all the other homes conform to the grade of this hillside.
- 33 residences (19 primary and 14 ADU) is overly dense for that parcel, which is currently open space and zoned for 11 residential units.
- This street is a dead end, so the additional approximately 70 cars will have a huge traffic impact on F Street and the surrounding streets. Capitol Street which is posted No Parking will inevitably be impacted, who's going to manage the illegal parking? The city and taxpayers.
- The proposal provides no visitor parking, or storage for snow plow equipment, or internal mailbox area.
- In the latest proposal, the homes do not mitigate the large profiles, or the unsightly side and rear profiles of the homes. The Avenues homes' profiles face the front of the street. If this is allowed, for Ivory, then what stops the rest of the homeowners from doing the same. What's good for one is good for all! This would become a Pandora's box for the city.
- The Ivory proposal requests a change in reducing the setbacks. Why would this be allowed? The current setbacks are good enough for all the current homes, they provide a sense of space, an example is the Meridien, it has large setbacks which provide a visual mitigation.
- Concession-Ivory is requesting a number of concessions for the city, the rezone is particularly disturbing; grade changes, density, retaining walls (visually ugly and not compatible in the neighborhood). What are they giving back to the neighborhood? Please tell me! They should be providing open space in this development. Developers should be required to open space in their developments, especially in an historic neighborhood.
- Reducing setbacks shrinks the lot sizes (again open space) and gives them more density, and allows them to build closer to the current homes. WHY, would that be considered acceptable? The homeowner bought their properties under the current zoning and they should not have to carry the burden of Ivory Home's greed.
- The most recent proposal states that they want to reduce the setback in order to provide a "park in front of the development". Let's just call it what it is, this is a drainage area, and they plan to build it up with a retaining wall. Allowing them to build a retaining wall will have an environmental impact as well as visual impact.
- Reviewing the "Cottages" square footage and calling them cottages is an outright misrepresentation. These are homes, and if anyone believes that these will be low cost rentals, then I question your judgement. These will be expensive rentals, given the cost of these homes, the cottages won't be used to provide affordable housing, Let's just stay real about what's going on here with their request.
- The proposal requests an increase in zoning height, allowing this will set a precedent for other future builds in the neighborhood, and open the city to countless requests for variances as well as potential lawsuits if not granted in the future. Does the planning commission really want to start this trend?
- Under the current plan there is no room to accommodate the historic trees in this area, there are 20 trees that go back to the original VA Hospital build, in their request Ivory Homes says they will work with the Urban Forester to determine what can be saved, but in reality we all know that this will be minimal, how else can the accommodate the extreme number of houses that are being requested. We've all seen this scenario play out so many times with developments; the old trees are torn down for trumped up reasons, and the developer plants small inexpensive trees. Not only are these trees historic, they are integral to the habitats for the wildlife in this area. You can't replace the benefits of mature trees. Please don't allow them to take away the wildlife habitat and the benefits of these trees to our air and environment.

As you can see and I'm sure have experienced, the residents of this neighborhood understand the value of what this neighborhood represents, and love the Avenues, it's special. I am not opposed to development but I am opposed to

developers coming into neighborhoods and pushing for variances that are different for the current variances. They say that it's the only way that they can make the number work, a profit; well they should have known what their profit margin was under the current zoning or walked away from the purchase. This is **simple greed** at the expense of the neighborhood. What is the benefit to the community? I write this letter to you with the hope that the planning commission will see through this project and consider all the people that live here. Let them work under the current zoning as others have done, and provide something beneficial with the project as others have done. What they are asking for is just too much take and no give! This project is not in character of the Avenues and current zoning.

Thank you for your time and understanding. To quote a former First Lady "Just Say No".

Sincerely,
Mona Marler

Subject: (EXTERNAL) Ivory Homes Project at Capital Park Ave and F Street

Date: Monday, April 4, 2022 at 4:37:22 PM Mountain Daylight Time

From: Gary Crittenden

To: Echeverria, Daniel

Daniel,

Thanks again for your careful attention to the project that Ivory has proposed in our neighborhood. I think this is the fourth time I have written to you about it. I know my patience with their "revised" proposal is wearing thin. I can only imagine how many projects like this you have to deal with as developers try to run roughshod over zoning regulations.

I am sure you know the detail of Ivory's latest proposal. My wife Cathy and I had really hoped they would come back with a proposal that would be consistent with current zoning but still allow them to build something that could be profitable for them. Sadly, they have not done that. In fact, in my view, this proposal is even worse than the last one. What could they be thinking?

Here are, at first blush, some of the things that appear to me to be completely unacceptable:

1. It looks like they have removed the parking area for visitors parking. This was supposed to be the place where they would deposit plowed snow, set up mail boxes and have visitor parking. How could eliminating this make it better? They can't use Capitol Park Avenue for this because it is all "no parking".
2. Not only is Ivory requesting a change in zoning from the current neighborhood but even if they were to get the new zoning, their proposal looks to me like it would require exceptions to SR1 zoning. The setbacks they are proposing are completely inconsistent with the neighborhood (our lot at the Meridien has 50 feet) but is also inconsistent with SR1 Zoning. Where do the exceptions end?
3. The retaining wall in the back of the property is huge! There is already a retaining wall from Northpoint at the north end of the property that looks to be about 11 feet high. Ivory is proposing another 13 feet. A wall that high will look like the massive retaining walls up and down I-15 where the freeway overpasses the streets below. I was just down on the 4th South Exit (north side of I-15) where the exit comes into 4th South. I pulled over and looked at the retaining walls. My best guess is they are about 25 feet high. Do we really want retaining walls like that in the Avenues?
4. These are huge homes...not just in square footage but in height. This is not low income housing. Only wealthy people could afford these McMansions. Also, check out the placement of the homes. They don't "front" the streets. The backs and sides of the homes face the outside streets. It is like a fortress.

In each of the letters that I have written to you, I have emphasized that Cathy and I are fine with the development of the property. It should just be done with current zoning, ensuring that the city protects homeowners who purchased their home under the assumption that entirely inconsistent projects would not be allowed by the city. We are relying on you!

Thanks again for your patient consideration,

Gary and Cathy Crittenden
400 E. Capitol Park Ave, #501

400 E Capitol Park Avenue
Apt. 306
Salt Lake City UT 84103
April 13th, 2022

Daniel Echeverria, Senior Planner
Salt Lake City Planning Division

Dear Mr. Echeverria,

Data from 2006 GACC Review of SR-1 Inventory in the Avenues

All the city ordinances require that new infill development be of a similar scale and character to the existing neighborhood. To quote from the Purpose Statement of the SR-1/SR-1A ordinance, “*Uses are intended to be compatible with the existing scale and intensity of the neighborhood.*” The Planned Development ordinance also requires that, “*...a planned development implements the Purpose Statement of the zoning district in which the project is located.*” In various writings, the Preserve Our Avenues Zoning Coalition (POAZC) has stated that Ivory’s proposed development is of far greater bulk and density than that present in the SR-1A section of the Avenues. This can be seen to be abundantly true from a review of the attached map titled SR-1 Building Heights.

This map is from a 2006 review of housing in the SR-1 section of the Avenues conducted by the Greater Avenues Community Council (GACC). This data presented to the planning division at the time, was a part of a broader review that led to the change from SR-1 to SR-1A for the block sections of the Avenues, restricting the maximum building height to 23 feet.

The map shows Primary Building Heights for the 2,394 dwellings in the then designated SR-1 (now SR-1A) section of the Avenues which includes all of the blocks in the upper Avenues. Buildings are color-coded as 1.0 Story Primary Building (1084 units 45%) 1.5 Story Primary Building (676 units 28%), 2.0 Story Primary Building (634 units 26%).

Ivory has proposed a development with 19 primary dwellings, at least 14 of which, and probably all of which, will be two story dwellings. To-date, Ivory has only provided height dimensions for the eleven Multi-Gen units at 27 feet 4 inches, but it is probably safe to assume that all the buildings will take advantage of the permitted 28 feet height limit under SR-1 that they are applying for. Thus, all nineteen units will be tall two-story buildings.

A review of the attached map shows that there are zero blocks in the upper Avenues that have all two-story buildings. If one looks at the closest six blocks with a total of 83 dwellings, only 13 (16%) of these are two story buildings and even these few tend to be on larger lots.

Although Ivory refers to the units with ADUs as cottages, these are not cottages. As can be seen from the table below these are in fact large houses with three car garages and four/five bedrooms, far more typical of homes found in the FR-3 zone than of those in the SR-1A sector. Below is the data from Ivory's application:

<u>Cottage Duets</u>	<u>sq. ft.</u>	<u>Multi-Gen</u>	<u>sq. ft.</u>
Basement	810	Basement	848
First Floor	758	First Floor	818
Garage & Storage	787	Garage	463
Second Floor	1095	Second Floor	1685
Primary Total	3450	Primary Total	3817
ADU First Floor	104	ADU First Floor	540
ADU Second Floor	601	ADU Garage	269
ADU Total	705	ADU Total	810
Combined Total	4156	Combined Total	4626
Number of Bedrooms	4	Bedrooms	5
Number of Garages	3	Garages	3

Summary

- 1) The Avenues SR-1A section is predominately smaller single-story homes.
- 2) Only 16% of the nearby SR-1A homes are two story.
- 3) There are NO blocks in the SR-1A zone that have all two-story homes.
- 4) Ivory's homes with ADUs are not cottages but large high mass buildings with three car garages and 4/5 bedrooms.
- 5) Ivory's request for SR-1 zoning (max 28 feet) versus prevailing SR-1A zoning (max 23 feet) further adds to the bulk of these units.
- 6) Reduced setbacks, reduced lot sizes and high surface lot coverage all add to excessive bulk with minimal green space.
- 7) Ivory's terraced design with large multi-lot building platforms and retaining walls that further consume already reduced side yard and rear yard setbacks further add to the bulk of this proposed development.
- 8) Ivory's proposed development is of far greater density than any of the adjacent or nearby blocks.

It is indisputable that Ivory's proposed development does not comply with the requirement to be compatible in character, bulk and intensity with the existing neighborhood.

The request to rezone to SR-1 should be denied if the city is not to completely ignore its own ordinances.

Peter Wright

Chair – The Preserve Our Avenues Zoning Coalition.



Sent from my iPad

Subject: (EXTERNAL) Zoning History of 675 North F Street
Date: Monday, April 4, 2022 at 4:23:44 PM Mountain Daylight Time
From: Peter Wright
To: Echeverria, Daniel, Jan McKinnon, Alan Hayes, Preserve Our Avenues Zoning Coalition, Wharton, Chris, Janet Wright
Attachments: Letter Mr. Echeverria . History of FR-3 zoning (1).docx

Dear Daniel,

Please find attached a note that sets out the reasons why 675 North F Street was zoned as FR-3/Foothills Residential by earlier city planners and why it should retain this zoning. As always I would greatly appreciate you taking these factors into consideration in formulating your recommendations and would request that this note is included in the pack to go to the planning commission.

Best Regards,
Peter

400 E Capitol Park Avenue
Apt. 306
Salt Lake City
UT 84103

April 4th 2022

Senior Planner Daniel Echeverria
Salt Lake City Planning Division

Dear Mr. Echeverria,

Review of the Zoning History of 675 North F Street and why it should continue to be zoned FR-3/ 12,000 Foothills Residential

In order to understand why earlier professional planners designated 675 North F Street as Very Low Density (1 - 4 units per acre) in the 1987 Avenues Community Master Plan and as FR-3 /12,000 Foothills Residential when this ordinance was enacted in 1995, I have sought out those involved in zoning in the Avenues for decades and canvassed their collective memory banks. These were principally members of the GACC who were involved in the creation of the Avenues Community Master Plan as well as being involved in developing the language of the current FR-3/12,000 Foothills Residential ordinance.

The reasons cited by various individuals were as follows:

- 1) Zoning relationship to adjacent and nearby neighborhoods
- 2) Proximity to open land and wildlife
- 3) Topography, concerns with water run-off and erosion and difficulty of building on highly sloped parcels
- 4) Limit development to preserve the scenic character of this foothills area
- 5) Water pressure concerns at these higher elevations
- 6) Traffic - every development in the upper Avenues impacts all of the lower Avenues

1) Zoning relationship to adjacent and nearby neighborhoods

675 North F Street sits in a foothills residential area where it is surrounded by FR-3 zoned developments on all sides. FR-3 requires a maximum density of 3.63 dwellings per acre.

To the North

To the north is Northpoint with 50 residences zoned FR-3. Although constructed prior to the creation of the FR-3 zoning designation, Northpoint has a density that is fully conforming to FR-3 requirements.

To the East

To the east is the northern section of F Street adjoining 13th Avenue, a block of 12 homes zoned SR-1A. Although largely built prior to FR-3 zoning and currently zoned SR-1A, this 3.17acre block has a density also in line with FR-3.

Further along 13th Avenue and above 13th Avenue all of the homes are zoned FR-3.

To the South

Immediately to the south is the Meridien zoned RMF-35. The Meridien is a condominium conversion of the historic Veterans Administration (VA) building. A special exemption was given in 2006 to preserve this building that is listed in the National Registry of Historic Buildings. Density in this development was strictly controlled by a development agreement with the city that limited the number of residences to 36 (Main building 29, Annex, now the Wright Building 7) Please note that Ivory's assertion that these buildings have 57 dwellings is completely erroneous. Permitted density in these condominiums is around half of that proposed by Ivory for their project. It should also be mentioned that the conversion of the then unutilized VA building to a condominium complex was widely welcomed by the neighboring community.

To the West

To the west is Capitol Park, also zoned FR-3. Capitol Park is a 53 unit single family home development constructed under FR-3 zoning. This development extends to the south of the Meridien down to 12th Avenue making the Meridien the only anomaly to FR-3 zoning density in the immediate vicinity.

Ivory's Proposed Development

Ivory proposes a development with 19 primary dwellings and 14 ADUs for a total of 33 dwellings on a 3.2 acre plot giving a density of 10.3 dwellings per acre - orders of magnitude greater than all the surrounding neighborhoods.

2) Proximity to open land and wildlife

675 North F Street is 120 yards from City Creek Canyon and a part of an interface or boundary area between open land and development where wildlife is ever present. The FR-3 Ordinance recognizes this including the goal , "*to protect wildlife habitat*" in the Purpose Statement. Limiting development to somewhat larger lot sizes allows some green space for wildlife and mankind to coexist in these boundary areas. This need to protect wildlife habitat remains as valid today as when the area was designated as very low density in 1987 and again confirmed as such with the FR-3 designation in 1995.

3) Topography, concerns with water run-off and erosion and difficulty of building on highly sloped parcels

This is a concern also recognized in the FR-3 Purpose Statement which seeks to limit development in order to prevent flooding and erosion. Ivory's overly dense design covers the land with excess hardscaping to the extent that a large drainage basin is required; they then disingenuously call this a Private Park and in turn use this to justify an increased number of dwellings with reduced setbacks. In an attempt to tightly pack dwellings, Ivory's design features twinned homes with conjoined driveways mirrored on either side of the road. This flawed design approach necessitates multi-lot terracing with a staggering 1629 linear feet of retaining walls, some as high as 13 feet, running both north/south and east/west.

When one considers the lengths Ivory goes to to impose excess density onto this foothills plot that slopes 50 feet diagonally across the lot, the wisdom of limiting development is clearly evident.

4) Limit Development to Preserve the Scenic Character of this Foothills area.

Again a goal embodied in the FR-3/12,000 Purpose Statement. Ivory's proposal, with 1627 linear feet of unsightly retaining walls, some as high as 13 feet, scars the hillside and destroys the beauty of this foothills plot. Units are packed so tightly and setbacks reduced such as to maximize hard surface coverage and minimize greenspace. The proliferation of retaining walls consumes much of the side yard and rear yard setbacks. This property contains upwards of 20 mature trees, several of which meet the criteria of "Specimen Trees" as defined in the Salt Lake City Private Tree Ordinance - none will be retained. Sensitive development under FR-3 could retain a number of these beautiful mature trees as was done when Northpoint and Capitol Park were developed.

5) Water pressure concerns at these higher elevations

No longer a valid concern.

6) Traffic - every development in the upper Avenues impacts all of the lower Avenues

An even more valid concern today. This upper Avenues location is not walkable, has few to no amenities and has minimal public transport. All two adult families are forced by necessity to own and operate two vehicles, even for short trips to the supermarket or to the city, injecting traffic onto all the lower Avenues streets. City policy as enumerated in the Mayor's State of the City address, in all the newer city ordinances and 5 year housing plan calls for high density development to be in walkable areas of the city close to jobs, amenities and mass transit in order to reduce vehicular emissions. This is not such an area.

7) Conclusion.

It would seem that almost all of the factors that led to this lot being zoned FR-3/12,000 Foothills Residential are still valid today, leading to the conclusion that the lot is correctly zoned FR-3 and that request for a radical rezone combined with a planned development should be denied.

Thank you,

Peter Wright

Chair - The Preserve Our Avenues Zoning Coalition.

Subject: (EXTERNAL) Ivory homes proposal for North F street.

Date: Friday, April 1, 2022 at 10:49:19 AM Mountain Daylight Time

From: Jeff Burton

To: Echeverria, Daniel

Hi,

Please don't accept the Ivory homes resubmittal.

Nothing has changed much.

Their proposal, if accepted and acted upon, will cause all likes of trouble for that area.

Everyone needs to stay with current zoning to avoid all those problems. (You know from others what they are.)

One thing more: it will ruin the legacy of the VA hospital and its history here on the upper avenues.

Please don't approve the zoning change proposals.

Thanks and we appreciate your efforts to keep the the place safe and beautiful.

-- Jeff Burton

Subject: (EXTERNAL) FW: Ivory F Street Property Rezone and Related Fire Safety Concerns for Northpoint Estates
Date: Friday, April 1, 2022 at 9:57:28 AM Mountain Daylight Time
From: Judy_Joel Daly_Deaton
To: Echeverria, Daniel, [REDACTED]
CC: Judy_Joel Daly_Deaton
Attachments: Ivory F Street Property Rezone and Related Fire Safety Concerns for Northpoint Estates 3-31-2022.docx

Please accept my apologies for the misspelled name in the email address. I believe the correct address is now in place.

Please see the attached information.

Regards,

Joel Deaton
[REDACTED]

From: Judy_Joel Daly_Deaton
Sent: Thursday, March 31, 2022 11:41 AM
To: [REDACTED]
Cc: [REDACTED]; mark.s.levitt@gmail.com; [REDACTED]
[REDACTED] Ed Zipser <[REDACTED]>
Subject: Ivory F Street Property Rezone and Related Fire Safety Concerns for Northpoint Estates

Joel L. Deaton
813 North Juniperpoint Drive
Salt Lake City, Utah 84103
March 31, 2022

Mr. Daniel Echeverria
Senior Planner, Salt Lake Planning Division
Salt Lake City, UT 84114

Dear Mr. Echeverria:

We have had discussions with Mr. Anthony Allred, Division Chief, Fire Prevention Bureau, Salt Lake Fire Department, regarding fire safety concerns with respect to the proposed zoning change for 675 N F Street.

In the event of a wildfire, the portion of F Street bordering this property is the only way the Fire Department could reach Northpoint, and the 100 + Northpoint residents could evacuate.

Compared with existing zoning, the zoning change would allow homes with up to 18 more cars to be placed on this portion of F Street. On-street parking from some of these additional cars would narrow Northpoint's sole wildfire access and escape route to two lanes, delaying fire vehicles reaching Northpoint and Northpoint residents getting out.

In light of these considerations, we have asked Mr. Allred to tell you that retaining existing zoning decreases "the risk of damage from future wildfires," as the "Proactive land use planning" the Fire Department's "Guide to Fire Adapted Communities," requires land use planning in a Wildland Urban Interface to do.

Although Mr. Allred has said that the Fire Department does not preemptively involve itself in items before the Planning Commission, he has also said he will comment on this matter if asked.

We are therefore asking you to ask Mr. Allred for his written response to this single specific question: "Would retaining existing zoning for 675 N F Street decrease the risk of damage from future wildfires?"

Regards,

Joel Deaton
Chair. Northpoint Estates Management Committee

Subject: (EXTERNAL) FW: Opposition to Ivory's Rezoning Requests regarding the 675 North F Street Property
Date: Wednesday, March 30, 2022 at 6:27:39 PM Mountain Daylight Time
From: Scott Young
To: Echeverria, Daniel
CC: Wharton, Chris, Preserve Our Avenues Zoning Coalition, Scott Young
Attachments: Letter Opposing Ivory's Petition for Changes to Zoning, Master Plan, etc 010622 signed.pdf, 2 minute speech on planned development 02 21 22.docx

Mr. Echeverria,

My understanding is that Ivory has made a few minor, non-substantive tweaks to its rezoning requests and is now seeking to present those rezoning requests at the April 27th Planning Commission meeting.

I have attached my letter opposing Ivory's rezoning requests, which I had previously sent to you. As explain in more detail in my letter, Ivory's requests are not appropriate for our neighborhood, are not fair in light of Salt Lake City's restrictions on the surrounding properties, and are not consistent with Salt Lake City's long-held historical positions. Accordingly, I and my family respectfully request that the City deny Ivory's requests and require Ivory to comply with the existing zoning requirements just like everyone else.

I would like to speak at the April 27th Planning Commission public hearing as to why Ivory's plans simply do not meet the requirements of a planned development. I have attached my Outline on this topic and would appreciate you sharing it with the Planning Commission.

Thank you for your time.

Scott F. Young
Chief Operating Officer



201 S. Main St. Suite 1400
Salt Lake City, Utah 84111

mobile
office



www.sentry.financial
linkedin.com/in/scott-f-young

From: Scott Young <[REDACTED]>
Sent: Thursday, January 6, 2022 1:06 PM
To: [REDACTED]
Cc: [REDACTED] Scott Young <[REDACTED]>
Subject: Opposition to Ivory's Rezoning Requests regarding the 675 North F Street Property

Mr. Echeverria,

I appreciated you taking the time to attend the GACC zoom meeting last night and to provide insights into the rezoning process. I have attached my letter opposing Ivory's rezoning requests. Ivory's requests are not appropriate for our neighborhood, are not fair in light of Salt Lake City's restrictions on the surrounding properties, and are not consistent with Salt Lake City's long-held historical positions. Accordingly, I and my family respectfully request that the City deny Ivory's requests and require Ivory to comply with the existing zoning requirements. I appreciate your time. Thanks and stay safe.

Scott F. Young
Chief Operating Officer



201 S. Main St. Suite 1400
Salt Lake City, Utah 84111

mobile [REDACTED]
office [REDACTED]

www.sentry.financial
linkedin.com/in/scott-f-young

Subject: (EXTERNAL) Ivory Homes

Date: Wednesday, March 30, 2022 at 11:53:24 AM Mountain Daylight Time

From: Jeff Polychronis

To: Echeverria, Daniel

CC: Preserve Our Avenues Zoning Coalition

Dear Mr. Echeverria,

I write once again to voice my opposition to Ivory Homes' most recent request to rezone the property at Capitol Park Avenue and F Street.

Ivory's March 10th submission did very little to address the many defects in their proposal identified by concerned Avenues residents. Ivory continues with their application for an overly dense development with 33 residences (19 primary and 14 ADUs) on a lot that would normally have a maximum of 11 single family homes.

Ivory has made no significant changes to their flawed design concept in which they seek to terrace the property into large building pads requiring a proliferation of tall retaining walls that scar the hillside. This is not the normal method of managing grade in the Avenues where individual homes are stepped along the hillside with sufficient room between buildings for grade transitions. This proliferation of tall retaining walls will be the dominant visual feature of this development.

The only plat change of significance is the removal of Parcel B, the four-stall guest parking area, from the center of the development. This not only increases the parking problem caused by the addition of approximately 70 cars but now gives Ivory no place to store plowed snow or accommodate a mailbox cluster internal to the development. Ivory has no right to push snow onto Capitol Park Avenue and no right to park on Capitol Park Avenue, which has now been posted as No Parking on both sides of the street. Ivory also cannot position a mailbox cluster on Capitol Park Avenue as this would encourage illegal parking to access the mailbox stack.

In this latest revision Ivory has made an improvement to the appearance of the side and rear profiles of the buildings that front Capitol Park Avenue, adding additional design elements, however, this does not mitigate the high bulk of these large units. Throughout the entirety of the Avenues front profiles of homes face the street, not large unsightly side and rear profiles combined with tall retaining walls. Setbacks remain far less than stipulated in the proposed new zone (SR-1) and continue to add to the bulk and density of the development.

Overall, the development is overly dense, of high bulk and impact and not compatible with this neighborhood. The Meridien, the refurbished and historic VA Hospital, which Ivory cites as justification for their density, has very large, 50 feet plus, setbacks which greatly mitigate its bulk. The application for both the rezone and the planned development should be denied.

Thank you,

Jeff Polychronis

[REDACTED]

Subject: (EXTERNAL) oppose Ivory Homes 4th rezone

Date: Wednesday, March 30, 2022 at 10:36:37 AM Mountain Daylight Time

From: CClark

To: Echeverria, Daniel

CC: Wharton, Chris

I strongly oppose Ivory Homes' 4th rezone proposal. This is still not good for the Avenues.

Here are my reasons:

My husband and I are long-time residents of the Avenues. We strongly object to Ivory Homes' request for rezoning at the property located at 675 N 'F' Street. Their proposed development is not suitable for the Avenues. The intent of allowing ADUs to exist was to provide help for individual homeowners who felt the need. The intent was NOT to help a developer make more money on less land. Ivory's rezone request is altogether too dense for this location.

As you are well aware, zoning regulations exist for a reason. If zoning regulations can be changed whenever a developer wants to change them, what good are they? If the proposed changes were for the good of the community, maybe that would be a reason to approve a rezone. Well, in this case, the rezone is definitely not for the good of the community. This is totally obvious if you look at the results of past votes taken by the Greater Avenues Community Council (GACC) [1244 to 25 against rezoning]. The rezone would only be for the good of Ivory Homes, so they could squeeze more money out of their intended project.

We are concerned about growing traffic on our Avenues streets. These streets were designed and built many years ago. They were not built for heavy usage. They already present risks at 4-way corners. So much additional traffic from the proposed over-populated cottages would exacerbate the dangers. Then, because we are at a higher elevation than most parts of Salt Lake City, the risks get even worse on snowy or icy days. In addition, we are an active neighborhood, with many walkers and cyclists. Please notice our attempts at "traffic calming." We don't need more traffic to add more danger for pedestrians!!!!

Ivory's request is not compatible with the ambiance of our neighborhood. Two of the aspects we most love about the Avenues are the relative quiet of the neighborhoods and the presence of older, individually-built homes, each with their own unique characteristics. These proposed homes do not align with that vision. According to Ivory's plans, there will be minimal setback and minimal greenspace. There are even a number of lovely mature trees that would be removed. That's bad for wildlife, bad for aesthetics, bad for our quality of life, and not suitable for the Avenues.

In summary, Ivory Homes' request for a rezone at 675 N 'F' Street lacks a logical basis for approval.

Please do the right thing and do not approve the request.

Respectfully submitted,

Carolyn Clark

929 N Terrace Hills Dr

SLC UT 84103

Subject: (EXTERNAL) Ivory Homes...Again!

Date: Wednesday, March 30, 2022 at 8:16:36 AM Mountain Daylight Time

From: Anne Albaugh

To: Echeverria, Daniel

CC: Peter Wright

March 30, 2022

Dear Mr. Echeverria:

I have written to you before and I am writing again in response to Ivory Homes and their continued push, push push to get into the Avenues with their ridiculous plan to build 23 homes on land zoned for 11. Who, exactly, do they think they are?

I do not know where you live, but I would guess that you and your neighbors - just like here on the Avenues, must comply with zoning rules. Why does Ivory Homes think that they do not have to comply? They knew when they bought the land that it was zoned for 11 homes...now they want to build 23. Why would they think they can do this?

Someone, somewhere in Salt Lake..the Planning Commission, the City Council or some powerful entity has led them to believe that if they push us long and hard enough that their plan will work. Do not let this plan work! It is only about Ivory making a lot more money. It does not address the impact their huge, ugly development will inflict on our neighborhood.

Help us please to protect our zoning...we need our zoning and master plan in place to protect against the threat of wildfires, protect our wildlife and the entirety of the upper Avenues proximity to wild lands - from the west side near this parcel of land all the way to the University of Utah on the East. We need to keep density to within our master plan...this is important.

Don't allow Ivory Homes to create this monstrosity and run away....please.

Thank you,

Anne Albaugh
453 E 3rd Avenue
SLC, UT 84013



Subject: (EXTERNAL) Ivory Homes OVERBUILDING in the AVENUES AREA

Date: Wednesday, March 30, 2022 at 4:44:18 AM Mountain Daylight Time

From: Judy Kennedy

To: Echeverria, Daniel

I strongly OPPOSE the OVERBUILDING of 19 houses on a lot zoned for 11 houses or the REZONING of that lot for such a TRAVESTY!!!

MOST SINCERELY,

JUDY KENNEDY


Subject: (EXTERNAL) Objections to Ivory Homes' proposal for 675 N. F Street

Date: Tuesday, March 29, 2022 at 10:03:51 PM Mountain Daylight Time

From: John Kennedy

To: Echeverria, Daniel

CC: Preserve Our Avenues Zoning Coalition

Daniel Echeverria, Senior Planner
Salt Lake City Corporation


Re: Ivory Homes proposal for 675 N. F Street
Dear Mr. Echeverria:

I again write to voice my continuing objections, this time to Ivory Homes' most recent version of its desire and plans for development of the subject property. Because Ivory's current request to obtain concessions from the City is really not materially different from its recent third submission (and varies little from its first two submissions) I wish to restate all the objections which I have already sent to you. Please make all my objections a part of the ever-growing record.

In addition to those defects which I have previously identified, I would add a few more: First, I believe that the Planning Department is probably fully aware of the strange and unsightly appearance of the extensive retaining walls which are an integral part of Ivory's plans. These walls certainly do not fit in with the surrounding neighborhood. In addition to the horrible aesthetics of those walls, I believe that they also present a substantial danger to younger children in the area. In some places those walls exceed 10 feet in height, which is an obvious attractive nuisance to adventuresome youth. This is particularly true in view of the fact that the open spaces within the proposed development are so small and restricted coupled with the total lack of any recreational facilities included in the Ivory plan. Moreover, because nearly 500 feet of those walls run very near and parallel to Northpoint Drive, they present a threat to the integrity of that road as well as a further danger to traffic on that road. In the recent past, during bad weather, a vehicle jumped over the curb of Northpoint Drive and crashed into a decorative brick wall, creating a large hole in that wall. Should a similar event occur along Northpoint Drive where no solid brick barrier is present, a errant vehicle could plunge down into the Ivory proposed development, injuring the vehicle operator and its occupants and striking a home or other improvements.


In addition, we have yet to learn of the Fire Department's position with respect to the many problems created by this proposed development from a fire-safety standpoint. I ask that your office request a written report from the Fire Marshall as to the Department's position on these matters which have been presented to Fire Department representatives by neighbors to the proposed project. I have been informed that the Marshall has said he would not state the Fire Department's position unless requested to do so. Please request him to do so.

As you know, the red-tail hawks have returned to their nesting areas on the property, serving to remind us all of the environmental and natural impacts expected from the proposed project if it is allowed to proceed. The disregard of these impacts is yet another inconsistency with the City's upper Avenues master plan.

The proposed cluster of "cottages" costing well in excess of one million dollars creates enormous problems for the City and the surrounding neighborhood. Nothing is offered by Ivory to compensate the City for the concessions demanded by Ivory. Ivory can move forward with development of this property under existing zoning. Thus far, after more than two years, and literally hundreds and hundreds of reasoned objections, Ivory continues to ignore the objections and to press for a zoning change which is not justified in

any meaningful way. Their proposal should be denied.

Yours very truly,

s/ John Paul Kennedy
805 N. Grandridge Drive
Salt Lake City, Utah 84103


Subject: (EXTERNAL) Ivory Homes Rezone Request F Street & Capitol Park Ave

Date: Tuesday, March 29, 2022 at 8:00:36 PM Mountain Daylight Time

From: Larry Perkins

To: Echeverria, Daniel

Daniel, do these emails to you really have any impact?

It seems like deja vu for me to be writing to you yet again as Ivory attempts yet again to alter the style but not the substance of their destructive proposal for the neighborhood in which I live.

I and many others have already written extensively about the adverse impact that the traffic and aesthetics of Ivory's proposal would have on the existing visual and functional harmony of our neighborhood.

But as I note the consistent presence of inconvenient and disruptive features within Ivory's proposal [narrow streets; dominant retaining walls; lack of parking; etc.], let me plead with you as a Planner to exercise your responsibility to save the uninformed public from its own areas of ignorance.

Because I personally -- as a Member of the Capitol Park HOA -- (1) Own and (2) Pay for the maintenance of Capitol Park Avenue, I am especially sensitive to the fact that that street is **Not Available** for parking nor for garbage pick up nor for mailbox delivery nor for the storage of plowed snow coming out of Ivory's proposed development. So that renders even more important Ivory's need to have an internal plan for accommodating those needs their Home Purchasers and Dwelling Unit Residents will have.

But Ivory appears to fail miserably in meeting those needs.

Instead, Ivory seems only focused on maximizing their density.

Look at Ivory's sketches. There is no place for the storage of plowed snow. There is no place for more than Token Visitor Parking to reach the 28 dwelling units that are stuck in the interior with narrow, curving access roads. But Ivory will not be living there. So Ivory seems not to care about those practicalities of day-to-day-living.

But the Most Dangerous aspect of Ivory's ill-conceived plan to Maximize Density on their property while Failing to Provide an Access Point from F Street is the resulting difficult access for emergency vehicles.

On Sunday, March 27, a structure on 6th Avenue & G Street caught fire. Like the homes Ivory seeks to build, the distance between homes in that area is narrow. But -- fortunately -- the width of 6th Avenue is wide and with numerous access points. So -- when the six fire trucks came to fight the fire, they WERE able to closely approach the burning building even tho they completely blocked the wide street and most of the block. Had such a blaze happened deep into the interior of Ivory's design, it is very doubtful that the fire department would have been able to have access for sufficient resources to keep other structures from being engulfed in the flames.

Current zoning allows for 11 homes on Ivory's property -- and therefore ALSO another 11 ADU's. Contrary to Ivory's 33 Dwelling Unit proposal, that total of 22 dwelling units CAN be designed to preserve the existing mature trees on the property And to allow the interior Lots to be accessed from at least two points (One on Capitol Park Avenue and One on F Street). Current zoning has the additional advantage of being consistent with the existing neighborhood and of not overburdening Capitol Park Avenue {which the City DOES NOT PAY TO MAINTAIN ... but which I and my HOA neighbors DO PAY TO MAINTAIN}.

Sincerely,
Larry Perkins
405 E 12th Ave.
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Subject: (EXTERNAL) Ivory homes

Date: Tuesday, March 29, 2022 at 7:11:15 PM Mountain Daylight Time

From: Susan Little

To: Echeverria, Daniel

If we didn't care if these homes were built we wouldn't have voiced our opinions these last many months. We don't want the homes and we're not going to give up. So why don't you.

Susan Little

Subject: (EXTERNAL) Ivory homes

Date: Tuesday, March 29, 2022 at 6:15:26 PM Mountain Daylight Time

From: Jim and Eileen Brown

To: Echeverria, Daniel

I am 100% AGAINST the ivory homes project in the avenues. Do not approve! I hope you have driven by and seen what we will lose. Just like the Joni Mitchell song ...

Don't it always seem to go

That you don't know what you've got till it's gone

They paved paradise, put up a parking lot

Sent from my iPhone

Subject: (EXTERNAL) No Rezone for Ivory Homes!
Date: Tuesday, March 29, 2022 at 2:34:47 PM Mountain Daylight Time
From: Jan McKinnon
To: Echeverria, Daniel
Attachments: Dear Daniel.pdf

Please see the attached letter. Thank you. Jan McKinnon

Dear Daniel.

I live at 400 Capitol Park Avenue in Salt Lake City. You have heard from me several times regarding the Ivory Home proposed project at 675 N F Street. I remain opposed to their project even with the minimal concessions they made in their latest submission.

This project is still too dense. The lot is zoned for 10-11 homes which makes sense for the lot and the neighborhood. Asking for concessions to put 17 homes plus ADU's is way too much. Ivory calls the homes cottages but they are not cottages; they are huge homes. Ivory is advertising the homes as multi-gen housing or ADU's and yet it will be up to the individual owner how they use the space. Several owners could decide to keep the house as a single residence without adding housing stock as Ivory likes to advertise. There is no guarantee that each unit will be used as a two-family residence.

Even with an untrained eye, it appears that the hundreds of feet of retaining walls would be a scar on the hill side not to mention how dangerous they could be if not properly built. It appears that there is a several foot gap between the retaining wall of Northpoint and Ivory's proposed walls. This could be a danger to a child who might fall between the two walls; wildlife could get trapped in between the walls; not to mention all the trash that could accumulate between the walls. It appears that several of the homes look directly into a retaining wall from their exterior windows. With the retaining walls and all the hardscape, this project if built as proposed, would not fit into the neighborhood.

It's also apparent that not much thought has been given to where mailboxes will be placed, how snow removal will be done, where guests will safely park, and where children will play. A quick look also suggests that it would be difficult to get delivery trucks in and out of the development let alone a fire truck or emergency vehicles.

Ivory has never demonstrated a good reason for needing a rezone for this property. They can develop the property without a rezone. To put dense housing on this lot is a huge loss for the community and Ivory Homes is the only one to benefit because they make more money. They keep boasting that this is an experimental project. The big question is why put an experimental project on a piece of land that requires so many concessions from the city? What benefit is the city getting from this project? Adding more housing, while simultaneously trying to maintain the character of our existing neighborhoods cannot be done by increasing density at any cost—Ivory's proposal simply does not make sense. And there is also the risk of collateral damage to consider. Will the aggressive overreach of this proposal, if approved, damage the trust that residents have placed in our local government? Will housing issues blind the city to the need for well-considered and sensible residential development decisions which respect the neighborhood context?

I ask the commission to give a negative recommendation to this application.

Subject: (EXTERNAL) Ivory Homes F Street Proposal

Date: Monday, March 28, 2022 at 2:55:24 PM Mountain Daylight Time

From: Hugo Rossi

To: Echeverria, Daniel

Dear Mr. Echeverria,

Once again there is a “new” proposal from Ivory Homes for the development of the 3.2-acre vacant lot at the top of F Street. It fails to respond to – even to acknowledge - the concerns of the neighborhood, to wit:

1. Building 33 housing units in an area zoned for 11 units creates a level of congestion that is not supportable given the current street configuration.
2. The argument that the project addresses the city’s need for low-income housing is spurious – the proposal actually aggravates the issue.
3. There is no easy access to public transportation or shopping areas.
4. Acceptable access of fire and other emergency vehicles is not provided.
5. Access to and egress from existing projects is dangerously reduced.

I recommend that the board inform Ivory Homes that there will be no zoning change based on any proposal that does not satisfactorily address these issues.

Hugo Rossi

Subject: (EXTERNAL) 673 "F" Street

Date: Sunday, March 27, 2022 at 9:11:55 PM Mountain Daylight Time

From: Cindy van Klaveren

To: Echeverria, Daniel

CC: [REDACTED]

Mr. Echeverria,

My name is Cindy van Klaveren and I live at 843 N. Grandridge Court, SLC, UT 84103. I remain opposed to the rezoning required for Ivory's planned development at 673 N. "F" Street. This is the 4th letter I have written in opposition to this horrendous proposal by Ivory. You have heard my objections to number of units, increased traffic, on-street parking, disregard for wildlife, increased pollution, and the overturning of our protective Avenues current zoning.

This project might actually threaten my life and the lives of my family in the event of a wildfire or natural disaster evacuation down "F" Street. The approximate 100 cars in Northpoint, my residence, might be held up at the exit chokepoint, as the 70 plus cars from Ivory's proposed project, attempt to exit. Why would our elected officials allow the possibility of such a potentially dangerous situation generated by greedy developers?

As I walk past this lot in question, I can't help but think how differently things might be today if Ivory had simply respected the zoning. The 11 homes might already have been completed. Our schools and churches would have benefitted. Perhaps by now, we might have met new neighbors or made new friends.

If Ivory is allowed to change the zoning and build their disastrous ill-suited project, could current residents in the surrounding area ever have anything but negative feelings towards the new owners of these homes? Would it even be possible to peacefully coexist with the owners of these million dollar "Cottages"?

Perhaps Ivory is using stalling tactics by resubmitting new proposals that have no significant changes. As a taxpayer, I am angry that Ivory developers can monopolize so much of the City's valuable resources, namely the time and talent of our elected officials. How much is too much? Is there no end to these proposals by Ivory? If only Ivory had shown respect for the current zoning in the very beginning, the 11 homes would probably be completed and the City could move on to other items.

The number of units and buildings has not changed. Please preserve the current Avenues Zoning.

Thank you,

Cindy van Klaveren

Cynthia van Klaveren, M.Ed.
Adjunct Instructor, ESL
Salt Lake Community College



Subject: (EXTERNAL) Response to Ivory's Fourth Application to the Planning Division
Date: Friday, March 25, 2022 at 12:25:53 PM Mountain Daylight Time
From: Alan Hayes
To: Echeverria, Daniel
CC: Wharton, Chris, Preserve Our Avenues Zoning Coalition
Attachments: letter to Daniel E from Hayes.docx

Dear Mr. Echeverria,

Please accept the attached as my response to Ivory's latest application for a rezone and planned development for 675 North F Street.

Sincerely,
Alan B. Hayes, Ph.D
793 Northpoint Ct.
Salt Lake City, UT 84103

Executive Summary:

- Ivory has now submitted their fourth application to the City in two years.
- The new plan is minimally changed from the third iteration. Still 19 primary and 14 ADUs for a minimum total of 33 dwelling units on 3.2 acres.
- Ivory requires many concessions from the City to build their demonstration project, but the City gets very little in return. A few more dwellings than Ivory could build under current law and zoning and nothing remotely affordable. If you pay an estimated 1.2 million to buy a home with an ADU, are you going to rent that ADU for a song? Not likely. In fact, there is no guarantee that you will rent it at all.

Fourth in two years: Ivory Homes made their fourth application to the Salt Lake City Planning Division on March 10, 2022, to develop the 3.2-acre vacant lot at the top of F Street in this long two-year saga. Is there something fundamentally flawed in Ivory's proposed design that they have to keep trying again and again? I think yes. The design is too dense for this location and Ivory is having trouble squeezing it all in even with all the concessions they are requesting.

Not much different: The new submission differs only a little from the previous application, although they have polished their rationale in the narrative section quite a bit. Ivory still wishes to build a packed cluster of structures with at least 33 residences, including 5 custom homes on F Street that may or may not have ADUs and 14 residences in an interior enclave of homes each of which will have an ADU. This totals a minimum of 33 residences (19 primary and 14 ADUs) on a plot that is zoned for a maximum of 11 single family homes under the current FR-3 zone.

The current zone allows 22: Under current law, each of the 11 single family homes that could be developed under the current FR-3 zone could have an Accessory Dwelling Unit (ADU) if the "conditional use" application were approved, which is highly likely to happen. Thus, under FR3, Ivory could build 22 dwellings on this land: 11 primary and up to 11 ADUs. A dwelling accommodates one family in my commonsense viewpoint; the definition of family may differ depending upon the audience.

Please note that Ivory's new narrative claims only 9 lots could be created under FR-3. It appears they wish to make developing under FR-3 sound as unreasonable as possible. The Planning Division confirms that the real number is 11 lots. Ivory also states that under FR-3 the homes would all have multi-million-dollar price tags, as if Ivory will somehow be forced into this.

Corporate image: But that is not good enough for Ivory. They apparently want to create a demonstration project with ADUs as new construction in this Upper Avenues location. If you take the time to read their application to the City – it is getting rather lengthy—you will discover that Ivory is willing to use every marketing trick in the trade to promote their wonderful new vision for our Avenues neighborhood. It sounds good until you delve into the details.

SLC must give, give, give, give: Ivory is requesting four major concessions from the City: a rezone from FR-3 to SR-1, an amendment to the Avenues Master Plan, a Planned Development that allows them to circumvent zoning regulations, and approval of a plat plan featuring what opponents argue is a flawed design. In their latest narrative Ivory now also admits that they will need a variance to a city ordinance governing grade changes to build their many retaining walls to squeeze their vision into this significantly sloped plot of land.

To quote from page 9 of Ivory's narrative in the section titled Retaining Walls: *"We understand that there are grade change stepping requirements to limit large retaining walls as visual nuisances. As a part of the PD [Planned Development] and to preserve our setbacks and open space we will require a variance to this provision."*

Ivory seems only to want to take: So, Ivory admits that the proliferation of tall retaining walls is a "visual nuisance", but apparently they do not care that they will violate this. Instead, they ask the City for yet another variance. How many concessions is the City prepared to grant? And what does the City get in exchange for these many concessions? I argue that the City is giving away the store for a few extra dwellings that will barely put a dent in the housing crisis to satisfy Ivory's desire to build a demonstration project that they hope will burnish their corporate image.

Will the promise be fulfilled? Ivory makes big promises for their ADU experiment, but will it all work out the way their application envisions? If allowed to build this, there is no doubt that the houses with ADUs will all be purchased in this sellers' market. But will all the ADUs house another family? There is no guarantee that this will happen. A purchaser could just as easily subsume the ADU into the primary residence. Ivory will win, but will the City?

More doors, more dollars. Ivory wants to maximize their profit, but they make it sound like that is not important to them. They argue the real motivation is that they want to help the City with its housing problem. I do not buy it. Ivory's rationale for this development is just a smokescreen for jamming yet more units into this admittedly rare chunk of open land in the Avenues.

There is too much risk and too little gain for the City to grant Ivory this rezone. Ivory knew what the zone was when they bought the land. Let Ivory use their creativity to develop this plot under FR-3 with an appropriate mix of housing types and let the City force Ivory to acknowledge that this steeply sloped land in the foothills was zoned this way for a very good reason.

Subject: (EXTERNAL) Ivory Homes Proposed Rezone (#4), 675 N F St.
Date: Thursday, March 24, 2022 at 7:04:08 PM Mountain Daylight Time
From: Ed Zipser
To: Echeverria, Daniel
CC: Wharton, Chris, Preserve Our Avenues Zoning Coalition, Hayes, Alan
Attachments: EZ-Echeverria_NO F ST. REZONE_YET AGAIN.docx

SORRY, THIS TIME WITH CORRECT ATTACHMENT!

Dear Mr. Echeverria,

Please enter the attached letter into the record regarding this proposed rezone, which the vast majority of our neighbors and I agree is STILL a very bad idea. We believe that the latest proposed re-zone is little changed from the *three* previous proposals.

Sincerely,
Ed Zipser

Edward J. Zipser, Professor, Dept. of Atmospheric Sciences, Univ. of Utah
Cell: (801) [REDACTED] E-mail: [REDACTED]

822 N. Grandridge Dr.
Salt Lake City, UT 84103-3343
March 24, 2022

RE: Proposed re-zoning of 675 N. F St. from FR-3 to SR-1 (Version #4)

Dear Mr. Echeverria,

I am an 84-year-old resident of Northpoint Estates, adjacent to the land proposed for rezoning, and while I have written to you most recently in December 2021, following 3 previous letters, the first when this re-zoning was first proposed and then when it was slightly modified. Having reviewed this latest proposal (the 4th!) please permit me to write yet again, to demonstrate that until Ivory Homes is willing to make significant modifications, many of my neighbors, and I, will continue to oppose rezoning in the most united and strenuous manner.

I have lived here for 23 years, since I accepted a Department Chair position at the University of Utah. and my late wife and I *love* this neighborhood. I still work at the University of Utah, and until the COVID-19 closure, I enjoyed walking to the #11 bus to take me to and from the U of Utah daily. I still enjoy neighborhood walks daily, not least because of the abundant bird life including our resident red-tailed hawks.

We were *always* aware that this property could have up to 11 homes built on it, plus auxiliary units, and we accept that, but we must strongly oppose the proposed plan, because even as modified, it would surely have a major negative impact on the quality of life, not to mention safety, of those of us who live here. Walking and driving on F St would surely become more difficult and probably more hazardous, especially in winter.

Let me hasten to add that many neighbors and I applaud the efforts of the City Council to provide more affordable housing in our city, especially to minorities and other disadvantaged groups. We have always supported these efforts and we are proud that Salt Lake City is a leader in so doing. Higher density has its place, *but this location is not one of them*. Now that the #11 bus no longer ascends to 13th Avenue, public transportation is lacking, and there are many people, myself included, who simply cannot manage the walk down and up the steep hill, for example to the nearest grocery or drug store.

The most predictable impact of this major increase in population in this limited space will be a major increase in traffic on a very steep street, hazardous in winter, and marked departure from expectations based on existing zoning. It is certain to have a negative impact on tree cover and bird life. My neighbors and I urge rejection of the proposed rezoning. Please urge the Planning Commission and the City Council to reject rezoning until Ivory Homes (or another developer) provides a plan that is more compatible with this neighborhood. We do not oppose development of this property; we simply ask that if it is to happen, that it be done in a way that it is an asset to this part of the Avenues.

Sincerely,
Edward J. Zipser

Subject: (EXTERNAL) Opposition to Ivory's Rezoning Requests regarding 675 North F Street Property
Date: Monday, February 21, 2022 at 1:50:14 PM Mountain Standard Time
From: Scott Young
To: Echeverria, Daniel
CC: Wharton, Chris, [REDACTED] Scott Young
Attachments: 2 minute speech on planned development 02 21 22.docx

Mr. Echeverria,

I hope you are enjoying the longer weekend. In my prior letters, I explained why Ivory's ever-changing rezoning proposals should be denied. With respect to Ivory's most recent proposal, I would like to speak at the upcoming Planning Commission public hearing as to why Ivory's plans simply do not meet the requirements of a planned development. I have attached my Outline on this topic and would appreciate you sharing it with the Planning Commission. Thank you for your time. Stay safe.

Scott F. Young
Chief Operating Officer



201 S. Main St. Suite 1400
Salt Lake City, Utah 84111

mobile
office [REDACTED]

www.sentry.financial
linkedin.com/in/scott-f-young

Outline for 2 minute speech opposing Ivory's request for a planned development

I am Scott Young and am a resident of Capitol Park. I would like to address Ivory's request for a planned development.

The pertinent SLC Ordinance is Chapter 21A.55.010, which allows relaxation of zoning regulations if a planned development meets certain requirements. The Ordinance states:

"[A] planned development implements the purpose statement of the zoning district in which the project is located, utilizing an alternative approach to the design of the property and related physical facilities. A planned development incorporates special development characteristics that help to achieve City goals identified in adopted Master Plans and that provide an overall benefit to the community as determined by the planned development objectives. A planned development will result in a more enhanced product than would be achievable through strict application of land use regulations, while enabling the development to be compatible with adjacent and nearby land developments."

In evaluating achievement of these requirements, the City evaluates whether the planned development achieves the following five objectives:

1. Preserving, protecting or creating open space and natural lands

Ivory does not meet this objective:

- a. There is no real open space nor any space open to the public in Ivory's plans.
- b. Current zoning only allows for 11 lots - Ivory is requesting 19 lots – a 73% increase! When Ivory adds ADUs, the building footprints and concrete driveways leave little room for open space.¹
- c. Current FR-3 zoning requires a 12,000 square feet minimum lot size - Ivory is requesting lots as small as 4,286 square feet.

2. Historic preservation or restoration of existing historic buildings

This objective does not apply:

- a. There are no historic or other buildings on the Ivory property.
- b. The Ivory property is not like the Meridien or Annex properties, which had existing historic buildings.

3. Providing affordable housing

Ivory does not meet this objective:

- a. Ivory is not providing affordable housing under the definition outlined in the planned development process.
- b. Ivory's initial estimate was that each house will cost between **\$1 to \$2 million** and each ADU will **rent for \$1,500 to \$2,000 per month!** This estimate was a year ago in early 2021. With inflation and dramatically increasing construction costs, these estimates are low.
- c. Families with incomes that are at or below eighty percent (80%) of the area median income of \$45,883 can't afford Ivory's homes or ADUs.
- d. And, because ADU's are conditional uses that must be approved on a case by case basis, there is no guarantee that Ivory will actually provide additional housing that will be affordable.

¹ Ivory talks about 19 homes with 14 ADUs. But, on page 3 of Ivory's Site Plans and Subdivision Plat, Ivory's chart declares that Ivory's real intent is for 2 units per lot with a footnote stating "EACH LOT CONTAINS ONE PRIMARY UNIT AND ONE ADU", i.e., 19 homes and 19 ADUs.

4. Mobility: Enhances accessibility and mobility

Ivory does not meet this objective:

- a. This objective means:
 - i. Creating new interior block walkway connections that connect through a block or improve connectivity to transit or the bicycle network.
 - ii. Improvements that encourage transportation options other than just the automobile.
- b. Every occupant of an Ivory home or ADU will be driving a car!

5. Sustainability: Creation of a project that achieves exceptional performance with regards to resource consumption and impact on natural systems

Ivory does not meet this objective:

- a. Ivory's plans are to cover the entire property with homes, ADUs and concrete.
- b. Ivory's plans are not exceptional performance.

In summary, Ivory's plans simply do not meet the requirements of a planned development -- Ivory's plans simply do not result in "a more enhanced product" that is "compatible with adjacent and nearby land developments". Ivory is simply trying to use SLC's planned development ordinance as a smokescreen to cram in as many lots, homes and ADUs as physically possible with absolutely zero regard for the adverse consequences to the surrounding neighborhoods or to Salt Lake City.

I, and our Avenues' neighbors, respectfully request that you reject Ivory's requests for a planned development and a rezoning. Thank you.

Scott F. Young
322 East Penny Parade Drive
Salt Lake City, Utah 84103

January 6, 2022

Via email daniel.echeverria@slcgov.com

Mr. Daniel Echeverria

Senior Planner

Salt Lake City Planning Division

Re: Opposition to Ivory's Requests for a Zoning Map Amendment, a Master Plan Amendment, and a Planned Development Approval (the "Rezoning Changes") for the 3.2 acre lot located at 675 North F Street Property ("F Street Property")

Dear Mr. Echeverria,

My wife and I bought our home in the Capitol Park neighborhood in 2015, in large part on the ambience and character of the neighborhood. The Capitol Park neighborhood is on the western boundary of Ivory's F Street Property and also surrounds the Meridien and the Annex properties, which are across the street to the south of Ivory's F Street Property and are former Primary Children's hospital properties.

I am writing this letter in opposition to Ivory's ever-changing and expanding requests for the Rezoning Changes. I and over 2,100 of our Avenues' neighbors are extremely concerned about the high-density development that Ivory seeks to build. To be clear, I do not oppose the development of the F Street Property consistent with the existing zoning requirements, nor am I opposed to accessory dwelling units ("ADUs"). But, I and my neighbors are adamantly opposed to Ivory's requested Rezoning Changes that will forever adversely impact our neighborhood in so many ways (including damaging our property values), all to facilitate Ivory's desire to cram 38 homes/ADUs onto 3.2 acres (12 units per acre) instead of the 22 homes/ADUs permitted under the current zoning.

Ivory recently bought the F Street Property with full knowledge of the current zoning requirements. The existing zoning permits Ivory to build 11 homes. The recent 2018 ADU ordinance allows Ivory to add an ADU to each home, which doubles the zoning density for the F Street Property from 11 to 22 homes/ADUs.

But, that's not enough for Ivory. Per Ivory's "Site Plans and Subdivision Plat"¹, Ivory wants to build at least 38 homes on the F Street Property (19 homes with 19 ADUs). To accomplish this, Ivory is seeking to reduce the current minimum lot size of 12,000 square feet to less than the 5,000 square feet minimum for SR-1. There is no space for greenways or wildlife corridors. The yards are the size of postage stamps, with almost no greenspace and Ivory plans just one token private (not public) open space. This is directly contrary to the objectives of the Master Plan and violates at least one of the criteria for a Planned Development approval. Then, Ivory plans to further decimate the neighborhood by planning to install monstrous **retaining walls of up to 14 feet tall**, running both north/south and east/west throughout the F Street Property.

Ivory simply wants the City to disregard all of the rules and plans that apply to everyone else. The Master Plan states "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 dwellings..." **The Master Plan clearly designates the F Street Property and surrounding area as "very low density housing"**. Ivory's proposal is directly contrary to all of these requirements!

So, why is Ivory asking for these accommodations? Despite Ivory's marketing, it is definitely not about affordable housing or using the ADUs as mother-in-law apartments. These are specious claims! Ivory's estimate in early 2021 was that each house would cost between **\$1 million to \$2 million or more** and each ADU will rent for **\$1,500 to \$2,000 or more** per month! These amounts are low because, among other things, construction costs and rental rates have significantly increased since then. Nevertheless, even

¹ On page 3 of Ivory's Site Plans and Subdivision Plat, Ivory's chart declares Ivory's real intent is for 2 units per lot with a footnote stating "**EACH LOT CONTAINS ONE PRIMARY UNIT AND ONE ADU**". Ivory's false narrative of only 19 homes with 14 ADUs is contrary to Ivory's Plans and is simply disingenuous. See:

http://www.slcdocs.com/Planning/Online%20Open%20Houses/2021/11_2021/Capitol%20Park%20Cottages/3.%20Site%20and%20Plat%20Plans.pdf

Ivory's 2021 estimates are not "affordable" under local standards. The median household income of a SLC resident is \$45,883 a year. Even in Ivory's submission, Ivory states that for "High-Income Families" at 120-150% AMI, an affordable home is between \$300,000 and \$400,000. And **Ivory further states that "[a]ccess to transit can either be the key to housing stability or the component that creates instability." But, there is no easy access to public transportation from the F Street Property.** Moreover, the City will not be able to limit the use of the ADUs, which are more likely to be used as airbnbs or other short term rentals.

Let's be honest – Ivory's Requested Changes are simply about Ivory trying to maximize its profits, regardless of the lasting adverse consequences to our neighborhood!

Our Capitol Park homeowners as well as other homeowners in the neighborhoods surrounding the F Street Property (including the Meridien, Northpoint Estates, F Street, 13th Avenue and the wider Avenues community) are adamantly opposed to Ivory's request to develop its high-density plans for the F Street Property. In fact, the results from the most recent vote conducted in 2021 by the Greater Avenues Community Council were 1,244 votes against Ivory's rezoning and 25 for Ivory. **Over 98% of Avenues residents are against Ivory's requested Rezoning Changes!**

Some historical background is also helpful. The Meridien and Annex properties, and portions of Capitol Park homeowners' properties were previously owned by Primary Children's Medical Center. When Primary Children's Medical Center announced it was relocating its facilities to the University of Utah and was going to sell its property, Salt Lake City and the Avenues' residents were understandably concerned that **"the scale, design and density of any new development will be low-density residential in nature."**

As a result, Salt Lake City imposed **30-year Restrictive Covenants** on the Primary Children's Property (including the Meridien and Annex properties). Those Restrictive Covenants expressly state the reasons for the restrictions, including:

"Avenues residents are concerned about ... what will happen when [Primary Children's Medical Center] vacate[s] the existing buildings."

"The question of what type of uses will replace [the Primary Children's Medical Center's property] is a major concern of Avenues residents and city officials."

"From the planning standpoint, land use at the [Primary Children's Medical Center's property] **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 [low-density] residential.**"

"A new use [of the Primary Children's Medical Center's property] should improve rather than worsen existing conditions."

"The primary concern at this location is that the scale, design, and density of any new development will be low density residential in nature."

The reasons for imposing requirements for low density housing articulated by Salt Lake City with respect to the Primary Children's Property are incredibly more compelling today. The F Street Property is still surrounded by existing low-density residential housing. The development that Ivory plans to build, if a zoning change is approved, would add approximately 75 additional automobiles that will daily utilize the Avenues' streets, which equates to a minimum of 122,000 additional trips a year. Yet, the Avenues' streets are still today "narrow residential streets traversing relatively steep topography."

Today, as then, our and the surrounding neighbors' primary concern is that the scale, design and density of the new development on the F Street Property be low-density, residential in nature as designated in the current FR-3 zoning and as would be consistent with the surrounding neighborhoods. Ivory's Requested Changes to allow a high-density development is no more compatible with the existing neighborhood today than it was when Salt Lake City imposed the Restrictive Covenants.

For many of the same reasons set forth above, under the 30-year Restrictive Covenants, Salt Lake City imposed restrictions on properties contiguous to the F Street Property.

The City restricted the Meridien property to a maximum of 29 units. In fact, the Meridien has only 26 units. The Meridien is located on a parcel of 3.44 acres (3.84 acres if you include Capitol Park Avenue). This equates to 7.56 units per acre.

The City also restricted the Annex property to a maximum of 7 units. The Annex property consists of 1.82 acres; this equates to 3.85 units per acre.

By comparison, under the current zoning, Ivory can build 11 homes plus 11 ADUs for a total of 22 units. The F Street Property consists of 3.2 acres. This equates to 6.88 units per acre, which is basically equivalent to the number of units per acre on the Meridien property and is almost double that of the units per acre on the Annex property.

But, under the Rezoning Changes, Ivory wants to build 38 homes/ADUs on the F Street Property, which is 11.88 units per acre. This is a **173% increase** over the number of units per acre under the current zoning, a **157% increase** over the number of units per acre on the Meridien property and a **339% increase** over the number of units per acre on the Annex property. **This is not fair to the surrounding property owners that were restricted by the City!**

Salt Lake City recognized the essential character of our neighborhood and wisely restricted the density on the Meridien and the Annex properties. To allow Ivory to proceed with its high-density plans would be inequitable to the developers and homeowners of the Meridien and Annex and of Capitol Park. More importantly, it would undermine the care taken by Salt Lake City to prevent the move by Primary Children's Medical Center from destroying the ambience of our neighborhood. And, more distressing is that each homeowner in our neighborhood (including my family) bought his or her property and invested in our neighborhood in reliance on the residential character of the neighborhood and its low-density, residential zoning. **It is completely unfair to change the rules now.**

Ivory attempts to justify its Rezoning Changes by pointing to the Meridien and Annex buildings. There is no equivalence. The Meridien and Annex rezone was granted for the specific purpose of preserving two beautiful, neo-classical buildings listed on The National Register of Historic Places. The repurposing of these two buildings to condominiums in 2006 was widely welcomed by existing neighbors, in distinct contrast to the virtually unanimous opposition to Ivory's proposed development. It should also be noted that this redevelopment was done with great care to blend well with the existing, low density neighborhood, underground parking was established for all residents, and screened guest parking was provided above ground. The nature of these existing buildings has a lower footprint, allowing generous setbacks and landscaping again fitting in with the existing single family homes in the vicinity. Finally, Ivory proposes new construction -- not the repurposing of existing historical structures that are listed on The National Register of Historic Purposes.

In sum, Salt Lake City was understandably concerned that **"the scale, design and density of any new development will be low-density residential in nature."** and previously and accurately recognized, **"[a]ccess 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 [low-density] residential."** That assessment remains equally true today and should be enough alone to deny Ivory's request for the Rezoning Changes. That's why over 2,100 Avenues residents signed a petition opposing Ivory's Rezoning Changes and, at a recent GACC meeting, the attendees voted an overwhelming 1,244 in vehement opposition to Ivory's Rezoning Changes.

On behalf of our family, and Capitol Park and our Avenues' neighbors, my family respectfully requests that Salt Lake City firmly and unequivocally reject Ivory's request for Rezoning Changes and require Ivory to abide by the same rules and restrictions that affected the Meridien, the Annex, Capitol Park and the rest of the surrounding neighborhood. Ivory will still be able to develop the property under current zoning and will still make a sizeable profit.

Respectfully,



Scott F. Young

cc Chris Wharton, District 3 Salt Lake City Council
chris.wharton@slcgov.com

Preserve Our Avenues Coalition
POAZCoalition@gmail.com

Z:\Dropbox (Sentry Financial)\JMR and SFY\SFY\Prsnl\CPHOA\Letter Opposing Ivory's Petition for Changes to Zoning, Master Plan, etc 010622.docx

From: Echeverria, Daniel <[REDACTED]>
Sent: Tuesday, January 18, 2022 2:04 PM
Subject: 675 N F Street/Ivory Proposal Input Received

Good afternoon,

This e-mail is to let you know that the Salt Lake City Planning Division has received your input regarding the Ivory Development proposal for the 675 N F Street property. Due to the number of e-mails we've received, we haven't been able to personally respond to each one, but please know that we will read and consider every letter and will provide your input to the decision makers, both the Planning Commission and City Council, for their consideration.

You will receive an e-mailed notice when the proposal is scheduled on a Planning Commission agenda for a public hearing. The earliest the proposal could be on such an agenda is late February; however, it has not been tentatively scheduled for any particular date at this point and it may be scheduled for a later month. You can continue to provide written or e-mailed comments up until the date of the public hearing.

Information regarding the developer's proposal will continue to be available at the City's Open House webpage here: <http://bit.ly/slc-openhouse-01175>

If you have any questions, please feel free to reach out to me at my contact information below.

Sincerely,
DANIEL ECHEVERRIA
Senior Planner
Planning Division

DEPARTMENT of COMMUNITY and NEIGHBORHOODS
SALT LAKE CITY CORPORATION

TEL [REDACTED]
EMAIL [REDACTED]

www.SLC.GOV/PLANNING
www.OurNeighborhoodsCAN.com

Subject: (EXTERNAL) Support for Capitol Park

Date: Monday, February 7, 2022 at 2:14:43 PM Mountain Standard Time

From: Chelsea Peters

To: Echeverria, Daniel

CC: Wharton, Chris

To The Planning Commission and City Council,

I write to express my support for the proposed Capitol Park development by Ivory Homes at 675 N F St.

My partner and I have dreamed of living in the avenues. We love the neighborhood and the close access it provides to downtown, the hospital where I work, and the foothills and canyons where we recreate daily. However, despite many efforts to purchase a home there in the past 3 years, we've found ourselves hampered by limited housing availability, and disadvantaged by bidding wars that priced us out. We simply need more housing supply, and I commend Ivory for their thoughtful proposal.

I would like to address recent comments made by Peter Wright during the GACC meeting held January 5th. While I can certainly appreciate his passion for the Avenues, I found several of his statements to be misguided and ignorant of broader circumstances and community needs. First, he stated this project is an "unprecedented use of ADUs". While this may be true for the area, he failed to consider that as a city we face unprecedented low inventory of housing supply. Ivory has carefully crafted this plan and demonstrated how it can be effective, while specifically helping address crucial points of the Plan Salt Lake initiatives around housing. The proposal directly supports "access to a wide variety of housing types". It also helps "enable moderate density increases within existing neighborhoods where appropriate" and helps "encourage housing options that accommodate aging in place." On a personal note, my mother has moved to Salt Lake and I

have concerns with her living on her own as she ages. An ADU would be perfect for her to have her own space, but be close enough so we can support her as needed.

Contrary to Mr. Wright's comments, I believe this plan is compatible with the neighborhood. The Avenues is not a neighborhood characterized by large, sprawling lots. Surrounding developments near this property have even greater density than Capitol Park, namely the Meridian and Northpoint properties. Other nearby single family home lots are very similar sized, if not smaller, than those proposed by Ivory. It is not simply "an experiment", but a well thought approach to provide innovative housing options that still fit the feel of the neighborhood.

Mr. Wright also stated the project was a "sham" and a "ruse" by Ivory, which seem ignorant, given that they could easily build 11 homes in the \$1.5+MM range on the site. Instead, they've consciously put forth a proposal to address a key housing need in one of the last remaining areas to build in The Avenues.

The Planning Commission and City Council also need to consider timeliness of approving the plan. Since this was initially proposed, it's likely that the market prices of these proposed homes increased 20%+. Additionally, an increasing interest rate environment further increases cost to purchase/finance. Prolonging any further makes attainability more out of reach for hopeful owners.

If the plan is not approved, I fear that any homes developed in line with the current zoning would be priced far out of the reach of the overwhelming majority of prospective buyers, including me. The City Council has precedent for approving rezones to help address housing stock, most recently at Bueno Ave, and similar consideration should be given here. I hope you will appreciate and agree with these points, and I urge you to approve this project.

Sincerely,

Chelsea Williams

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Chelsea Williams

Subject: (EXTERNAL) Ivory Homes Capitol Park Cottages
Date: Monday, February 7, 2022 at 2:13:52 PM Mountain Standard Time
From: Tay Haines
To: Echeverria, Daniel

Daniel,

I submitted comments to the first proposal and missed the deadline for comments on the second. I do not support the volume/density of the proposal.

I often walk my dog in the area and cannot imagine the buildup, nor the car traffic.

Would you please put my email on the contact list to keep informed on the project?

Thank you,

Tay Haines

Subject: (EXTERNAL) Joel Deaton letter in opposition of Ivory Homes Rezone at 675 North F Street - Northpoint Condominium homeowner opposition
Date: Thursday, January 6, 2022 at 11:18:12 AM Mountain Standard Time
From: Judy_Joel Daly_Deaton
To: Echeverria, Daniel
CC: Mayor, [REDACTED] Judy_Joel Daly_Deaton, [REDACTED]
Attachments: Joel Deaton Ivory Homes opposition letter 1-4-2022.docx

Please see attached letter opposing the rezone of Ivory Homes property at 675 North F. Street.

This letter is from me as a homeowner in Northpoint Condominiums.

Joel L. Deaton
813 North Juniperpoint Drive
Salt Lake City, Utah 84103
January 2, 2022

Mr. Daniel Echeverria, Senior Planner
Salt Lake City Planning Division
[REDACTED]

Dear Mr. Echeverria;

I am writing to express my opposition to Ivory Home's most recent proposal to rezone the property at 675 North F Street. The area is presently zoned F-3 and should not be changed as proposed in the re-zone proposal.

The proposed rezone is inappropriate for the area based on a variety of factors:

- Increased density of units
- Increased traffic and noise
- Adverse effect on the area aesthetic
- Increased need to terrace (scar) the property to accommodate the increased number of units
- Increased need to build terrace – retaining walls that could be problematic to neighboring properties by compromising the ingress and egress
- Rezoning of the properties would not of benefit to the community only to revenue for Ivory Homes
- The property is not within walking distance to shopping, dining, employment, etc. as is indicated in the proposed rezoning
- The proposal contains numerous misleading and inaccurate statements concerning the community, the geography, topography, business accessibility and availability of public transportation among others.

I respectfully request that the Planning Division and the City Council deny Ivory's request for rezoning.

Regards,

Joel L. Deaton
Northpoint Estates Resident

Cc:
Mayor Erin Mendenhall
Chris Wharton, District 3 City Council



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

b. Support Letters

Echeverria, Daniel

From: Garrett44 <[REDACTED]>
Sent: Wednesday, January 5, 2022 1:09 PM
To: Echeverria, Daniel
Subject: (EXTERNAL) Ivory ReZone Capitol Park Cottages Yes

To Whom It may Concern,

I believe rezoning the Capitol Park Cottages will be beneficial to my neighborhood. I have lived in the Avenues for 6 years now and have found it a friendly and beautiful neighborhood. I think it would be a gift for others to live here. By rezoning more would be welcomed and enjoy the diversity and community of the Avenues.

Accessory Dwelling Units have been a part of the Avenues for a long time, if not forever. They allow for families to live together; such as multi-generational families - of which I am one of. Living with my son, his wife, and their children has helped us all; especially during these past couple of years of the pandemic. We help each other and are able to because we live close.

ADU also would allow for people to live close to work if they work downtown. By living closer to work traffic and air quality improves; people can walk to work or commute with their neighbor.

I believe rezoning the Capitol Park Cottages will be a good idea. I like that there is a small community park planned and additional parking spaces for guests.

I believe the rezoning will bring to our Avenues more diversity, cultures, and new friends. This is what the Avenues is about!

Sincerely,

Ellen Garrett

BCC: [REDACTED] [REDACTED]

Echeverria, Daniel

From: Maureen Makes <[REDACTED]>
Sent: Wednesday, January 5, 2022 5:25 PM
To: Echeverria, Daniel; Wharton, Chris
Cc: [REDACTED]
Subject: (EXTERNAL) Support for the Capitol Park Cottages Rezone

Dear Mr. Echeverria and Mr. Wharton,

I am writing in support of the proposed Ivory Homes rezone in the Avenues (petitions PLNPCM2020-00334/00335, PLNPCM2021-00656, PLNSUB2021-01175).

I am a resident and homeowner in the Avenues and was distressed to read in my Avenues Community Council newsletter that the POAZC felt this development was "overly dense for this suburban foothills location". Any argument that one of the original neighborhoods of Salt Lake, less than a mile from the Capitol, is suburban is completely baseless. I live in the Avenues because I want to be part of Salt Lake City, not the suburbs. We are an urban community by any definition of the word I could find.

This Ivory Homes project will help allow more people to be part of this amazing neighborhood and hopefully encourage more affordable rental opportunities while maintaining the residential feel of the neighborhood. We, as a community, have to plan for the growth our city is experiencing with more than just new high rise apartment buildings or sprawling suburban communities at the point of the mountain. This project provides an opportunity for us to be part of the solution to our housing accessibility challenges without losing the charm of the neighborhood.

I understand you have gotten a lot of dissent for this project, and I appreciate all of your thoughtful work to balance all of the competing needs.

Sincerely,
Maureen Botoman
467 C St, Salt Lake City, 84103

Echeverria, Daniel

From: Nathan Peters <[REDACTED]>
Sent: Monday, December 6, 2021 6:42 PM
To: Echeverria, Daniel; [REDACTED]
Subject: (EXTERNAL) Support for Capitol Park Cottages

Hi Daniel, Chris,

I hope this email finds you well and healthy. I am writing to you in support of the Capitol Park Cottage project by Ivory Homes located at 675 N F Street. I'll be upfront in stating that I may be slightly biased, in that I love this area and its close proximity to the best combinations of work and play that the state has to offer. I run in the Aves and/or City Creek almost every day. We take walks at Hilltop, run across BST regularly. I've dreamed of living in the Aves. But unfortunately my wife and I have struggled mightily to get a home in the Aves and have been outbid countless times. There aren't many development opportunities remaining, and this may be one of the best chances we have to secure what could be a forever home in the area we love most.

On the rezone, I believe the applicant has taken great consideration with their proposal. The 19 unit plan accomplishes much needed housing additions while respecting the architectural feel of the neighborhood. And the overall density of the project is largely in line with that of the surrounding lots and maintains more space than the vast majority of avenues blocks. Many of the neighbors in close vicinity are lots comparable to what is proposed here. I also don't have any noteworthy concerns that some have shared on traffic increase--the higher density developments of the Meridian and Northpoint Condos absorb theirs just fine, and I've never noticed traffic issues in the area. Ivory could have easily developed in line with the existing zoning and perhaps if acting purely out of economic self interest, they would have built 10-12 homes and sold for \$1.5-2mm+, putting them out of reach for the majority of hopeful homeowners. I've been impressed with their commitment to address housing needs here even if it wasn't the most financially rewarding approach for them.

It's also quite innovative and something that I think many people could benefit from. My wife and I would get great benefit from an accessory dwelling unit, as we've recently relocated her widowed mother to SLC from Las Vegas. We'd get a lot of comfort and ease having her close by (but still separate!). Regarding the amendment to the Master Plan. I think we can all agree that housing needs have changed dramatically since the inception of the Avenues Master Plan in 1987. Capitol Park seems to be very well in line with the goals of SLC's 5 year housing plan and Plan Salt Lake principles. I think we should be excited about this project and embrace the opportunity it presents. With the amount of thought that's gone into the proposal I would be confident in its implementation.

Overall I believe this proposal is well thought out and designed, while simultaneously furthering much needed housing opportunities in one of the best neighborhoods in the state. The benefits and goals accomplished through this project significantly outweigh what some have put forth as detractions. I would urge you to approve the proposals put forth.

Respectfully,
Nathan Peters
[REDACTED]

Subject: (EXTERNAL) Support for Capitol Park

Date: Monday, February 7, 2022 at 2:14:43 PM Mountain Standard Time

From: Chelsea Peters

To: Echeverria, Daniel

CC: Wharton, Chris

To The Planning Commission and City Council,

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Sincerely,

Chelsea Williams

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Chelsea Williams